



**Submission on the Proposed Accommodation Expansion, Cynthia Bay, Tasmania
by the
Tasmanian National Parks Association Inc. (TNPA)**

October 2004

*“In the midst of scenes so lonely,
Visited, and looked at, only
By times both brief and rare:
With its mighty hills surrounded,
Is lovely Lake St Clair.*

*Far from human haunts secluded,
Every jarring sound excluded,
Here Nature dwells alone.
Absent all the sounds of pleasure,
And of business’ hasher measure,
The only voice our own
(extract from poem Lake St Clair by Richard Smith, 1879)*

“National parks are for conserving the priceless remnants of the natural world in perpetuity. They are about protecting the inanimate physical structure of the Earth and the associated life forms that together constitute the living world. National parks are where we can witness raw land unimpaired by human manipulation, and as such, all commercial development – which can only degrade the integrity of wild land – belongs outside our parks’ boundaries” (TNPA Manifesto 2003:1)

“Heritage assets still well conserved but need to watch commercialization in and around major parks” (Destination scorecard for Tasmania, National Geographic Traveller, www.nationalgeographic.com/traveler/scorecard)

Visitor surveys and public input have consistently indicated that visitors come to national parks in order to experience and enjoy the natural world and do not wish to see major developments, preferring instead a low level of visitor facilities of a small and unobtrusive nature. (Judy Jackson, Minister for Parks, Wildlife and Heritage, Preface to Site Plan for Cynthia Bay, Lake St Clair, 1991).

“I first came to Tasmania in 1966 and quickly discovered the delights of the, then, relatively undeveloped Lake St Clair. For many years my wife and I would bundle the kids into the car and take them up to Lake St Clair for an affordable holiday. We enjoyed many times with the kids in the bush, in the snow and on the lake in a canoe. Then tragedy. A bloody mainlander thought he could make a buck, tore down most of the delightful old huts and replaced them with super expensive new huts to cater for the well heeled. This is to be repeated at Cockle Creek, where my family retreated to after the Lake St Clair fiasco.” (Email sent to the TNPA).

“I have said unequivocally and on many occasions that I do not support commercial tourism developments in our national parks” (Former Premier, Jim Bacon, Letter to the Mercury, 1 January 2003).

Submission on the Proposed Accommodation Expansion, Cynthia Bay, Tasmania by the Tasmanian National Parks Association (TNPA)

The TNPA wishes to provide the following comments on, and objections to, the proposal for expansion of accommodation facilities at Cynthia Bay by ES Link Pty Ltd. In order to layout the basis of these comments and objections, and to provide a basis for an alternative to the current proposal, the submission is split into the following three main parts.

- Part I: Here we provide specific comments on why the proposed development will degrade the natural and cultural values of the Cynthia Bay site and as such is inconsistent with the management objectives of the Tasmanian Wilderness World Heritage Area (TWWHA) as described in the World Heritage Area Management Plan 1999 (WHAMP).
- Part II: Here we review the Visitor Services Zones within the TWWHA and argue that the expansion of accommodation facilities as proposed is inconsistent with the management objectives for such zones.
- Part III: Here we put forward an alternative proposal based on an integrated strategic vision for the Cynthia Bay – Derwent Bridge region.

Part I

Inscribed on the World Heritage list in 1982, and then expanded in size in 1989, the listing of the TWWHA recognizes the significance of the natural and cultural values of the area. Many of the heritage values for which the broader TWWHA is recognized and subsequently listed, are evident within the Cynthia Bay area, particularly the significant geoheritage evident within the glaciated landscapes. Other important features evident at Lake St Clair include a suite of Aboriginal and historical values, habitat for endemic flora and fauna, and a suite of important social values stemming from the beauty and recreational opportunities of the area. (Environmental Impact Assessment, Part A, p1)

Overarching Management Objectives

The site of the proposed expansion of accommodation facilities at Cynthia Bay is within the TWWHA. As such, the proposed development is required to be consistent with the management objectives for this area. These management objectives are outlined in the WHAMP.

The overarching management objective of the TWWHA is stated on page 30 of the WHAMP:

1. To identify, protect, conserve, present and, when appropriate, rehabilitate the world heritage and other natural and cultural values of the WHA, and to transmit that heritage to future generations in as good or better condition than at present.

This overall management objective is further augmented by a number of other objectives. These include the principals to:

4.1 maintain or restore natural diversity and processes,

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- 4.2 *maintain or enhance wilderness quality,*
 - 4.3 *maintain or enhance environmental quality,*
 - 4.4 *maintain or enhance landscape quality,*
 - 4.5 *protect and conserve historic heritage and Aboriginal heritage.*

and

- 6. *To assist people to appreciate and enjoy the WHA in ways that are compatible with the conservation of its natural and cultural values, and that enrich visitor experience.*

The WHAMP also states that “the highest level of management responsibility is to protect, conserve and present the area’s world heritage values” (p34), while there is also “an obligation of long-term care and stewardship of the WHA to ensure that the area’s natural and cultural heritage is not degraded through cumulative impacts over time” (p31).

In this section, we outline how the proposed expansion of accommodation facilities at Cynthia Bay will breach all these management objectives and principles and for these reasons the proposal needs to be rejected.

Limitations of the Environmental Impact Assessment (EIA) and Review

A number of limitations are noted in the Environmental Impact Statement (the EIS, or Part A of the EIA) concerning the scope and methodology of the Environmental Impact Assessment undertaken in relation to the proposed development. These limitations include (p13-14):

- The proponent not providing substantive detail of the proposed development prior to field inspections.
- The EIA scope not including cumulative or integrative impact assessments.
- The EIA scope has not required detailed analysis of the potential impacts from a probable increase in visitor use of the area upon off-site facilities and values.

While further details of the proposal have been provided in the Environmental Management Plan (the EMP, or Part C of the EIA), due to these limitations the expert consultants have not had an opportunity to comment on the complete details of the proposal. For this reason the TNPA believes that the Environmental Impact Assessment process has been significantly compromised, as is the resulting EIS.

The TNPA also notes that the company Inspiring Place Pty Ltd conducted both the review of the Cynthia Bay Site Plan and the EIS/EMP for ES link in relation to the present proposal. The TNPA sees an inherent conflict of interest in this arrangement as it could be viewed that Inspiring Place Pty Ltd was aware of the present proposal whilst reviewing the Site Plan and that the final Site Plan was drafted on a basis that was sympathetic to the present proposal. Indeed, modifications to the previous Site Plan for Cynthia Bay which would not have allowed the present proposal to proceed (outlined below) only adds credence to this view. Again, the review and planning process appears to have been significantly compromised.

Finally, the TNPA would like to lodge the complaint that the 4 week period provided to review and comment on the proposed development has been too short. This is based on the fact that only Part C of the EIA was initially made available to the public, and while the TNPA appreciates that both Parts A and B of the EIA were subsequently made available, given the time taken to obtain these documents the time left to review all documents and prepare this submission was severely compromised. All relevant documents, including all Site Plans, should have been made available at the start of the public review period.

Compromised WHA Values

Table 2.6 summaries the significant values of the study sites. Of the nine values listed, four are described as having either High or Very High significance.

Physical Values

“Several key geomorphic (landform) values of World Heritage significance can be identified in and adjacent to the study site ...they remain integral elements of landform values for which the TWWHA was inscribed on the World Heritage List in 1989” (p 20).

The details of these landforms are provided in the EIS (Part A of the EIA) and will not be repeated here. However, it needs to be noted that several of these landforms (in particular, the glacial landforms and fluvial processes) are explicitly recognized as key World Heritage values of the TWWHA in the WHAMP (p23-24) and that these continue to qualify for World Heritage significance under two of the four revised criteria. Furthermore, those World Heritage values relating to glacial features [Natural Criteria (i)] are unique to Cynthia Bay (p51). The EIS assessment of the potential impacts on these values notes four major concerns (p95).

The Cynthia Bay terminal moraine complex has also been accorded very high (world level) geoheritage significance in its own right on the Tasmanian Geoconservation Database in virtue of the “Thule-Baffin” type moraines at Cynthia Bay (p21). Furthermore, the blanket bog peat soils at Cynthia Bay have geoheritage significance as a part of the broader blanket bog soils of the TWWHA (p22).

The EIA acknowledges that little is known about the groundwater hydrological processes in the Cynthia Bay area, and that it is unclear to what extent groundwater hydrology in the moraines influences the hydrology of the inter-moraine swales and swamps. Further development of the site as proposed therefore runs a risk of damaging the high geoheritage values of the site. Indeed the report states that “the proposed development may exacerbate some of the known impacts and result in additional impacts” (p72).

Given that the overarching management objective of the WHA to “protect, conserve, present and, when appropriate, rehabilitate the world heritage and other natural and cultural values of the WHA, and to transmit that heritage to future generations in as good or better condition than at present” and the above recognition that the proposed development will further damage the unique World Heritage values at Cynthia Bay, it is incumbent on all parties reviewing this proposal (the Department of Environment and Heritage for the Federal Government, the PWS for the Tasmanian State Government and the Central Highlands Council) to reject it on this issue alone. To do otherwise would be a complete abrogation of the obligations bestowed on these parties under the WHAMP to adhere to the overarching management objective for the area. It is plainly impossible to deem that building on a site of acknowledged world heritage values can be perceived as “protecting, conserving and presenting” those values. While there are differences, the proposal is nevertheless no different to defacing the Pyramids or other more well known World Heritage sites.

Together with the degradation of World Heritage geoheritage values, the EIS also states that past clearance of the under storey in the camping area has promoted significant erosion of the surface soil and that further clearance may lead to increased erosion in this high rainfall area (p73). For example, the treatment of stormwater runoff from the buildings is not addressed and may potentially impact upon the hydrology of the adjacent swale and riparian

vegetation (p83). Indeed, the EIS states that significant concerns have been raised regarding site drainage, particularly impacts upon hydrology and fluvial processes. The lack of detail provided by the proponents is considered to be a “significant flaw in the development proposal provided” (p82).

Historic (European) Heritage

A number of historic (European) heritage structures have been identified within the study site. These include 13 features listed on the Tasmanian Heritage Place Index, including features relating to the use of the area by Albert Ferguson (which is considered to have very high local significance), and Mimosa cabin. The EIA also notes that apart from Mimosa, all significant assessment to date should be regarded as preliminary and requiring review based on more research (p31). The EIA concludes that further development of the site will result in a diminution of these present historic heritage values. Indeed, “the proposed development has the potential to significantly modify or destroy a large proportion of the identified historic heritage values in the study area” (p74). Again, the proposed development is seen to be inconsistent with the management objectives of the WHA to “protect, conserve,…”

Social Values

The EIS states that the social values of the site are poorly researched, though it is noted that the proposed development has the potential to impact upon or degrade the evident social value of the site (p75). These impacts include loss of public access to, and through, the area and inequalities in accommodation options and the location of each – particularly the loss of amenity for low cost accommodation. In particular, there is an overall reduction in camping sites, loss of premium camp sites close to the lake (effectively restricting camping to the middle or rear of the area), and the visual impact of new buildings. In this regard the proposed development is inconsistent with the stated management prescription of the WHAMP that provision is made for “the equitable use of the site area…” (p132). Indeed, it is the low cost form of accommodation (i.e. camping) which is the most sympathetic form in relation to experiencing the natural values of the area and which should be encouraged (if any further accommodation is required). Further comments on the nature of the proposed accommodation facilities are provided below.

Visual Values

The EIS states that from a visual perspective, Cynthia Bay forms an important transitional point from the settled areas at Derwent Bridge and the visitor services area at the bay to the wilderness landscapes of the TWWHA (p42). Furthermore, the report also points out that the development site, on the whole, is characterized by its apparent biophysical naturalness and with a variable scenic quality depending on the level of disturbance (p43).

In relation to the criteria used for the assessment, Cynthia Bay and the development site is considered to be of high public sensitivity. This is due to:

- The importance of Cynthia Bay as a site within a Visitor Services Zone of the WHA;
- The importance of Cynthia Bay as a recreational destination of State significance for camping and walking, and
- The location of Cynthia Bay as the start/end of the nationally (internationally) significant Overland Track with attracts over 8000 users per annum. (p43)

Despite being declared a site of “high public sensitivity”, the EIS nevertheless states that the “overall visual impact will be low to moderate and will not be such that the overall character

of the landscape is lost” (p77) The TNPA totally disagrees with this conclusion. The present site is limited in size and predominately a camping ground with there also being a single backpacker building and 6 cabins sited in a single group. The proposal is to double the backpacker facilities, more than treble the number of cabins (which will be spread out over a wide area) and add three large “Premium” backpacker buildings at the presently unencumbered eastern end of the site. There will also be new service buildings, two tour guide cabins and a reception. All combined this will quadruple the present accommodation footprint on the site, effectively turning the site into a small village. The TNPA therefore finds it difficult to comprehend how the replacement of a present site which is predominately a camping ground with a small village cannot irretrievably alter the physical and visual character of the area. Indeed, the present naturalness of the area will be severely degraded. The need for boardwalks and hand rails only emphasizes the threat to the natural features of the area. As the objectives of the current Cynthia Bay site plan is to “maintain and protect the natural and cultural values of the Cynthia Bay area” (p5), again the proposal must be rejected.

Inappropriate Development

Apart from the threat to WHA values outlined above, the TNPA also opposes the present proposal on the following grounds:

Not Average! Not Basic! Too Many!

The proponents state that the accommodation has been designed to support use and activities which are consistent with the status of a National Park and the WHA (p 58). Again, the TNPA argues strongly against this conclusion. Apart from some expansion of back packer accommodation, all the other facilities are to accommodate the high-end of the tourist market.

The following planning objective is included in 2003 Site Plan for Cynthia Bay, Lake St Clair:

Provide a range of accommodation facilities and amenities that are accessible to the average family group. (p26)

The TNPA argues that the proposal to build another 14 luxury cabins (believed to be around \$200 per night) does not cater for the ‘average family’ but only to the high-end of the tourist market and as such does not comply with the planning objectives for the site. The existing luxury cabins are also in breach of this objective and should be removed – see Part III). The Premium Backpacker lodge (believed to be around \$100 per night) – and which “*will be marketed for conference and executive retreat groups*” (p56) - also will not cater for the ‘average family’ and should also be rejected.

While the present proposal is not consistent with the objective of the 2003 Site Plan, it is also interesting to note that only five of the six planning objectives for Visitor Facilities in the 2003 Site Plan for Cynthia Bay are the same as in the 1991 Site Plan for Cynthia Bay. The exception is the planning objective quoted above which replaced the original objective:

Provide relatively low-cost basic accommodation facilities and amenities that are accessible to the average family group (1991 Site Plan for Cynthia Bay, p2).

There has therefore been a subtle but important modification to this objective. The original focus on the provision of “relatively low-cost basic accommodation” has been broadened to a “range of accommodation”, though the important criteria that accommodation remains

accessible to the average family remains. The fact that the luxury-style cabin accommodation does not adhere to this important principle, and is not supported by traditional users of the National Park, is echoed in the following complaint:

“I first came to Tasmania in 1966 and quickly discovered the delights of the, then, relatively undeveloped Lake St Clair. For many years my wife and I would bundle the kids into the car and take them up to Lake St Clair for an affordable holiday. We enjoyed many times with the kids in the bush, in the snow and on the lake in a canoe. Then tragedy. A bloody mainlander thought he could make a buck, tore down most of the delightful old huts and replaced them with super expensive new huts to cater for the well heeled. This is to be repeated at Cockle Creek, where my family retreated to after the Lake St Clair fiasco.” (Email sent to the TNPA).

Finally, on page C5 of the EMP (Part C of the EIA), a table is provided listing the components of the existing and proposed accommodation facilities at Cynthia Bay and the maximum number of persons associated with each component. It is stated that the redeveloped facilities will accommodate 324 persons while the “total permitted number of persons on site” is 360. This statement is highly misleading, as the statement implies that the proposed level of accommodation is within the management prescriptions for the site. However, nowhere in the 2003 Cynthia Bay site plan is the total permitted number of persons on the site specified. Nevertheless, a limit on the site is mentioned in on page 132 the WHAMP, where it is stated that Ministerial Council approval had been given to construction of structures “with the total maximum accommodation being no greater than 72 people per night (as specified by the December 1993 site plan)”. Furthermore, this limit is even greater than the number specified in the original 1991 Site Plan which states that “cabin accommodation will be maintained approximately at present levels and standards” and “the maximum number of visitor accommodation cabins will be 7 catering for up to a maximum of 60 people.” (p18).

Again, these incremental changes to successive Site Plans (the “death by a thousand cuts” approach) makes a mockery of the overall purpose provided in both the 1991 Site Plan (and reiterated in the 2003 Site Plan!) to “guide the long-term development of the Cynthia Bay area and so ensure that development proceeds in a coordinated and integrated manner rather than on an ad hoc or facility-by-facility basis” (1991, p1; 2003, p5). Given that it is obvious that the present proposal is entirely incompatible with the original management objectives of the 1991 Site Plan, the 1993 Site Plan and the 1999 WHAMP it is inconceivable that a proposal to accommodate over 300 people on the site is now being considered! Indeed, if there is to be any credibility placed on the ability to focus on a long-term planning process, it is imperative that the original management objectives and limits specified in the 1991 Site Plan (or at least the previous 1993 Site Plan) still be adhered to.

As is expanded on below, the TNPA also argues strongly that the Cynthia Bay site is already over-developed and compromising the World Heritage values of the area, and that any further development (and indeed parts of the existing infrastructure at Cynthia Bay) should be placed outside the WHA at Derwent Bridge (or elsewhere).

Continuing Deals and Ad Hoc Development

As the statements in the previous section demonstrate, there has been a considerable modification and weakening of the management prescriptions in the Site Plans for Cynthia Bay since 1991. The initial planning objective to keep accommodation facilities at Cynthia Bay “approximately at present levels and standards” for around 60 persons was first

weakened in the revised 1993 Site Plan when the limit on accommodation was raised to 72 persons, while in the 2003 Site Plan there is no stated limit at all! Furthermore, the initial concept of providing low-cost basic accommodation look like it has also been forgotten as the present proposal mainly consists of luxury-style cabins.

The TNPA believes that these successive modifications of Site Plans have rendered meaningless the main purpose of these documents – to “ensure that development proceeds in a co-ordinated and integrated manner rather than on an ad hoc or facility-by-facility basis (1991, p1).” Because of this the TNPA argues that development of the Cynthia Bay area is still ad hoc with major developments being approved and proceeding on a facility-by-facility basis.

For example, Part A (the EIS) lists a “number of substantial developments with the Cynthia Bay area”, over the past decade (p5). These include:

- The building and operation of the visitor centre,
- Construction of a large car park and bus turning area,
- Expansion of accommodation facilities,
- Development of new PWS management and staff housing facilities.

Many of these developments have required amendments to the original 1991 Site Plan – for example a variation was undertaken in March 1992 to allow for the construction of a new Visitor Centre - and another variation to the Plan must have been made in order to allow the building of the 6 luxury cabins already on site (as this would have been inconsistent with maintaining cabin accommodation at present levels and standards). (It should also be noted that the amendment to the WHAMP in 2002 giving approval to the proposed development at Cockle Creek East is another classic example of the manner in which management plans continue to be compromised!)

Given this continuing ad hoc approach, the TNPA believes that past developments have already significantly degraded some of the values of the Cynthia Bay area. In particular, the present congestion in the car park and the siting of the visitors centre severely compromise the initial presentation and overall scenic qualities of the area.

The 2003 Cynthia Bay Site Plan states that the “the outstanding scenery of Lake St Clair is of particular value and interest” (p12). This plan also argues that the visual experience associated with Cynthia Bay begins along the Lake St Clair Road leading in from Derwent Bridge. Unfortunately, the visual introduction to the values of the WHA that one gains during the drive into Cynthia Bay comes to an abrupt halt at Cynthia Bay itself, where instead of being able to appreciate the “outstanding scenery of Lake St Clair” one is confronted with the ugliness of an urban car park and the back of a large building (the visitor’s centre). Only after negotiating both these obstacles can one finally make their way to the shores of Lake St Clair where one can for the first time admire the WHA values of the area. This confronting situation would not have developed had the original 1991 Site Plan been adhered to. The TNPA believes that the best way of presenting the values of the WHA to the visitor is to let Nature dominate the experience and speak directly to the soul of the person. Visitor facilities, where required, should be unobtrusive - not in your face like the present arrangements at Cynthia Bay. Again, this approach was clearly outlined in the 1991 Site Plan and should be adhered to. Any further expansion of facilities at Cynthia Bay will only exacerbate existing problems.

The continuing modification and weakening of the management objectives for the Cynthia Bay site is of great concern to the TNPA and should not be tolerated under the stated

objectives for the TWWHA. Indeed, amongst the main threats to the TWWHA identified in the recently published report *State of the Tasmania Wilderness World Heritage Area: An Evaluation of Management Effectiveness* is the “development of new facilities and other infrastructure, especially inappropriate sited facilities and infrastructure which can cause direct and/or indirect impacts (Summary, p12).” The TNPA considers the current proposal for new accommodation facilities at Cynthia Bay to be yet another example of such a threat. Furthermore, the same report states that “key stakeholders considered that political decisions were not always consistent with World Heritage Area management objectives and that this was a key factor limiting or threatening management performance for the TWWHA (Summary, p21).” Again, the TNPA considers the political driven shift in priorities away from a primary conservation role towards a more tourism focused role for the PWS is disturbing and poses a major threat to achievement of the primary management objectives to the TWWHA. The present consideration of a major tourist related facility with the WHA unfortunately is a classic example of this shift and this threat.

Inconsistent with function of Parks

The TNPA believes that Tasmania’s National parks are threatened by proposals such as the present which in essence offer little more than an extension of the city and its life-style transported onto a scenic background. Proposals for modern accommodation units and business conventions are incompatible with the conservation purposes for which National Parks were established. While the TNPA recognises the right of people to seek a range of tourist activities, it believes that conventional tourist opportunities are amply provided for *outside* national parks. The TNPA urges a recognition that the parks have a distinctive conservation function to perform that is separate from the service of conventional tourism, and that they must be managed explicitly to present that function to the public as their principle goal, separate from whatever conventional tourist services they may also have to provide. As such, the TNPA maintains that certain kinds of developments and activities, if allowed in parks, will undermine the attitudes that parks can, and should encourage.

Consistent with this view, the TNPA also argues that the star gazing platform, and the other proposed facilities along the sensitive lakeshore, are visually intrusive and detract from the naturalness and conservation values of the area. The stated objectives of the multilevel deck and ‘star watch’ platform for “sitting, relaxing, talking and casual eating overlooking the lake” (p58) again indicates that the developers are only interested in providing scenery for their customers. National parks do not exist just to provide scenery: they are to conserve Tasmania’s unique natural heritage and provide a visitor experience that is different and more challenging to those normally experienced in our modern urban landscapes.

Cars, Cars, and more Cars!!

A calculation of the number of vehicles expected to be on the site at times of maximum usage is indicated in Appendix C of the EMP (Part C of the EIA). While the TNPA believes that the estimated number of cars (54) is already too high, the TNPA also believes this number significantly under-estimates the actual number of cars which will be drawn to the site if the development goes ahead.

For example, it is listed that each cabin will attract only one car. However, six of the new cabins will accommodate 4 persons, while another 7 new cabins will accommodate 6 persons. Together with family groups, it is likely that these cabins will also attract adult groups consisting of couples who will most likely travel to the site in separate cars. This will result in at least two cars per cabin if not more. Furthermore, it is difficult to believe that

only 2 cars will be associated with the 56 persons accommodated in the backpacker facilities and only 12 cars associated with the 66 person “premium backpacker lodge.” (Note: visitor statistics indicate that most visitor groups in cars consist of two to four passengers: 1991 Site Plan, p10). Combined with the 10 large caravan / campervan sites, the place is going to look like a supermarket car park! The high presence of vehicles will also pose a threat to the continued presence of wildlife on the site. The overall impact will be inconsistent with the management prescription of preserving the natural appeal of the place.

Again, how can the proponents claim that the overall visual impact will be low to moderate and will not be such that the overall character of the landscape is lost!! Given the size of the expansion proposed, together with the number of cars (more likely to be 70-80) this clearly is impossible. It is somewhat ironic that the proponents state that external works aim to provide “visitors with a quality experience of the site and its surrounds” (p60). Again, the obligations under both the WHAMP and the site management plans demand that this proposal be rejected.

It needs to be noted that the existing general car park at Cynthia Bay will not be able to handle any overflow of cars from the camping and accommodation site. The 2003 Cynthia Bay site plan notes a number of major problems with the existing car park, not the least of which is that it is often full (p28). The TNPA argues that the only long term solution to both the accommodation and car parking problems is by siting both outside the WHA at Derwent Bridge (see Parts II and III).

If Degraded, Then Rehabilitate!

The EIS states that the present site suffers from the impacts of site hardening and loss of understorey vegetation with the spread of camping and caravan use around the site and limited control of vehicles and parking (p59). The present degraded nature of parts of the site is also used to justify the proposed expansion - further development is OK because the site is already degraded. However, this is a circular argument. Development leads to degradation – degradation is used as a justification for further development – further development only leads to further degradation of values – further degradation justifies further development...and so on!

It is sad that the proponents use as an excuse the past developments on the site as a justification for a further new development. However, they overlook the fact that the present provides an opportunity to rehabilitate and restore the area to its natural state and in so doing increase the significance of the area both within the National Park and the WHA. Indeed, the WHAMP places an obligation on managers to, when appropriate, “rehabilitate the world heritage and other natural and cultural values of the WHA”. Further development is not rehabilitation!

Not Eco-tourism

This proposed redevelopment would not pass Ecotourism Accreditation (a well known tourism scheme promoting environmentally friendly tourism businesses) and as such is not World’s Best Practice as:

- It is not sited outside the National Park
- It does impact adversely on the ecosystem.

A large majority of the travellers are aware of the need to locate accommodation away from areas of high conservation values, not only to minimise human impacts but to minimise disturbance to the ecology and natural values of the area. There is of course a small minority

who insist on the ‘ultimate experience’ – the wealthy who insist on the sort of armchair experience that resorts of this intended type offers, but it should not be the policy of the Tasmanian Government to pander to this selfish minority.

If the proponents are sincere about protecting the wilderness values of the area and educating visitors to appreciate these values (as outlined under Objective 6 of the WHAMP), then the TNPA insists that the WHAMP be adhered to and that the development be sited outside the National Park. Then the interpretive signs can inform the visitor that their accommodation was sited outside the Park in order to preserve the wilderness and world heritage values that they came to experience - otherwise, will the interpretative signs tell that part of the unique wilderness and world heritage values that they have come to see were destroyed for the placement of their accommodation and to provide for their comfort!!

PART II

Visitor Services Zones and Sites

As outlined in the WHAMP, Visitor Service Zones (VSZs) and Sites are areas where the majority of visitor facilities are, or will be, provided and where the majority of visitors will experience the WHA (p59). The key objectives of the VSZs are:

- To provide a range of appropriate facilities strategically located to facilitate visits to the WHA and enable all visitors to gain a first hand experience of a range of the values of the WHA; and
- To maintain, as far as possible, a natural setting and cultural integrity and to minimize the environmental, aesthetic and social impacts of facilities and visitor uses.

Visitor Service Zones and Sites are seen as complementing visitor services centres located nearby but outside the WHA, such as Strahan, Queenstown, Pencil Pine, Sheffield, Deloraine, Mole Creek, Liawenee, Miena, Derwent Bridge, Bronte Park, National Park, Stratgordon, Geeveston, Melaleuca and Dover.

A number of management prescriptions are listed for the VSZs (WHAMP p60). While these prescriptions include provision of “some overnight use by developing a range of facilities”, it is also stated that VSZ should cater “principally for the needs, interests and abilities of day visitors.” Furthermore, it is prescribed that such sites should be reviewed as part of the Recreational and Tourism Strategy. This strategy, which is outlined on pages 175-177 of the WHAMP, states that the WHA is a major plank of Tasmania’s tourism industry and in recognition of this fact the PWS has adopted a number of broad management approaches. Included in this approach is the development of a number of locations as WHA gateway areas that are well situated for general tourism development associated with but outside the WHA, and more specifically, “locating major accommodation and facilities outside the WHA or near its periphery.” Included in the list of gateway areas is Derwent Bridge.

In the section of the WHAMP that relates specifically to Accommodation, it is a management objective “To encourage the provision of accommodation in nearby townships and areas adjacent to the WHA” (p132). The rationale provided for this approach is based on research that “much of the experience sought by visitors ... is based on the area’s wilderness quality. To maintain this it is important that accommodation has minimal impact on wilderness quality and the WHA and the other natural and cultural values of the WHA.” Further articulation of the policy to site major facilities outside the WHA is provided by the Management Prescriptions which states that “Developments outside the WHA are preferred

to those located within the area” (p. 177). In relation to Concessions, it is also stated that “If facilities or services exist or can be developed outside the WHA that meet visitor needs, such facilities and services will not be provided as concessions within the WHA” (p 178). It is also stated that “Concession activities will only be allowed if consistent with the protection of World Heritage and other natural and cultural values of the WHA”. As outlined above, the present proposal clearly is not consistent with these objective and principles and as such should not be allowed to proceed.

The TNPA notes the following Management Prescription in the WHAMP:

“Continue to provide cabin accommodation within the WHA at Waldheim and Cynthia Bay in line with the following conditions:

- *the number of cabins at Waldheim will remain the same,*
- *the number and layout of cabins at Cynthia Bay will be determined in accordance with a detailed site design and will be located within the cabin accommodation and campground area as specified in the Cynthia Bay site plan” (p132-133).*

The compromising of the Cynthia Bay site plan has already been mentioned. Nevertheless, the TNPA argues that this Management Prescription is contrary to the stated Management Objectives of the WHAMP (as outlined above) and that where such a contradiction occurs in the Management Plan that the Management Objectives should take precedence. Indeed, the TNPA also notes that the Cradle Mountain-Lake St Clair National Park Management Plan, 1988, contained the following management prescriptions:

- *Due to limitations of space at Cynthia Bay, any further camping and accommodation will be established nearer to, or at, Derwent Bridge.*
- *Any further expansion of these services will be considered only in concert with any plans by private enterprise for the provision of camping and accommodation at Derwent Bridge*

These management prescriptions are generally consistent with the primary objectives relating to accommodation facilities contained in the 1999 Management Plan and outlined above and should continue to be followed.

Finally, on the issue of siting the development at a place other than Cynthia Bay, the PWS brief for the EMP is provided in Appendix A of the EMP (Part C of the EIA) and lists 10 questions which require to be addressed as outlined under the New Proposals process of the WHAMP. The third question asks “specifically why the development or activity needs to be located within the WHA (rather than adjacent to, or elsewhere outside the WHA” (p1). However, nowhere in the EMP is this question answered. The TNPA argues strongly that unless a coherent reason can be provided as to why this proposal needs to be sited at Cynthia Bay instead of outside the WHA that the proposal should not be allowed to proceed. The TNPA also argues that no such reason exists.

Derwent Bridge Area

The proposed re-development of accommodation facilities at Cynthia Bay is about creating a luxury tourist resort – like all resorts, location and views are its main selling points. The argument that the site is already degraded and therefore alright for development is shortsighted and, as has already been argued, degradation just begets more development and more degradation. The obligations under the WHAMP to rehabilitate degraded sites within the TWWHA are clear. Furthermore, the intention of the proposal to provide an experience in nature and the enjoyment of nature-based activities can all be realised even if the resort is located in Derwent Bridge.

Derwent Bridge offers a complete service infrastructure where the proponent can locate its overnight accommodation operations. Besides being much more cost effective, it is Derwent Bridge which needs the economic injection and not Cynthia Bay. Here the economic benefits which will flow from increased tourist facilities will flow to the entire community, not just a single developer.

Indeed, the TNPA believes that the concept of concessionary private rights within a National Park is incompatible with the very values that these Parks set out to uphold. While such rights do exist within Tasmania's National Parks, they are currently almost exclusively associated with the provision of services to day visitors at key Visitor Areas. The granting of concessionary accommodation rights to a large and significant area of a National Park (such as Cynthia Bay) should therefore be viewed with extreme caution and rejected. The construction of a reception building to the site, as mentioned in the plan, will no doubt engender a sense of private property and act as a deterrent to the public. This would set a dangerous precedent, which over time would no doubt see the granting of similar rights in other areas of Tasmania's National Parks and as such, a death of the sound principals on which the National Parks are based.

The development at Cynthia Bay will result in an artificial community. It means increased traffic not only from tourists but also from supply lines needed to sustain this community. Derwent Bridge is no more than 10 kilometres from Lake St. Clair and with bus shuttles, which the proponent already operates in the area, the level of traffic can be reduced.

The TNPA supports appropriate tourism based projects in Tasmania and supports the regional benefits that will flow from such projects. However, we argue 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 and Cradle Valley, to name only two, validate this argument. Indeed, if accommodation developments have all been sited outside the park at the northern end of the Cradle-Mountain- Lake St Clair NP (and not around Dove Lake, for example), then why allow the opposite to occur at the southern end of the park. Surely the reasons for conservation of the World Heritage and natural values at the northern end of the park also hold at the southern end of the same park. As such the TNPA argues against the siting of tourism projects such as the present proposal within any of Tasmania's National Parks.

PART III

Need for Integrated Vision for Cynthia Bay-Derwent Bridge Area

The Tasmanian Wilderness World Heritage Area is one of the best-known and most important tourism destinations in Tasmania. Growth in visitor numbers will place increased demand on visitor facilities in gateway areas such as the Cynthia Bay-Derwent Bridge area and will, if not properly managed, impact on the natural and cultural values on the TWWHA. As outlined above, the TNPA argues strongly that the present proposal will impact significantly on these values.

At present the Cynthia Bay-Derwent Bridge area is managed through two separate planning systems – the 1999 TWWHA management plan and the Central Highlands Council Planning Scheme. These plans were developed with limited reference to each other. As a result there

is no overarching tourism strategy that articulates a vision for visitor experience and appreciation of the area or defines infrastructure and management systems required to deliver the vision.

As was developed for Cradle Valley at the northern end of the Cradle Valley – Lake St Clair National Park, the TNPA argues that a comprehensive framework for tourism and infrastructure development is required in the Cynthia Bay – Derwent Bridge region at the southern end of the same park. This framework is necessary to:

- Protect the natural and cultural values of the WHA, and
- Meet the demands of increased visitor numbers

In particular, the vision articulated for the Cradle Valley Tourism Development Plan (CVTDP) would see the Cynthia Bay-Derwent Bridge area as a place:

- Which is identifiable as the entrance to the WHA
- That is a transition between ‘humanised’ landscapes of the surrounding region and the WHA where natural and cultural values are dominant. As the CVTDP states: “the visitor experience must be one that unfolds as people travel through the area, revealing a complex and many layered landscape of great natural beauty” (p8). The TNPA believes that the present ad hoc approach to development at Cynthia Bay is likely to undervalue the WHA experience with the attendant risk to visitor satisfaction (e.g. poor sense of arrival).
- Where the experiences available to visitors are compatible with the values of the WHA (the CVTDP articulates that the visitor experience must be one that “educates and uplifts” – “in wilderness is the preservation of the world” – “visitors want to be exposed to the wild and unique values of the WHA” (p8)).
- Where use and resource development reflect and respond to the natural and cultural values of the WHA, “comforts yet extends the visitor by taking them outside their normal experience of city and countryside into nature” (p8).
- Where use and development is managed to avoid degradation of WHA values;

As is evident in the Cradle Valley region at the northern end of the park, and outlined in the CVTDP, there are inherent risks associated with continuing with the current adhoc non-integrative approach (p5):

1. some natural and cultural values will be seriously compromised,
2. short term savings but long-term costs,
3. quality of visitor experience degrading over time,
4. loss of local economic benefits.

On the other hand, there are significant gains to be made through adoption of a long-term strategic approach, most notable the maintenance and protection of WHA values and significant improvements in the quality of the visitor experience (p5). Furthermore, there are substantial long-term economic gains to the local towns adjacent to the WHA. As already pointed out, the economic benefits which will flow from increased tourist facilities outside the WHA will flow to the entire community, not just a single developer.

The strategic approach being taken at the northern end of the park informs the approach that should be taken at the southern end of the same park. In particular, the following principals outlined for the entry into the WHA from Cradle Valley area need to be adopted for the entry into the National Park from Derwent Bride to Cynthia Bay (p14):

- The landscape is the dominant element with buildings well set back.
- Reduce the impact of car spaces from an environmental and visual perspective.

- Interpretation included with transport services and provided at visitor nodes and walks.
- Rehabilitation of disturbed sites.
- Removal of existing PWS staff accommodation and workshop.
- Development limited to facilities necessary to serve day visitors and WHA managers.

The emphasis is on management to reduce environmental impacts and any direct adverse impacts on the WHA values and “enhance appreciation of the wilderness setting”. In particular, the vision for the arrival at Dove Lake and viewing of Cradle Mountain is for a “strong sense of wilderness and natural values, and where some experiences may safely stretch the comfort zone of some visitors” (p15).

The TNPA supports a similar integrative managed approach for Cynthia Bay-Derwent Bridge. While the TNPA believes that existing facilities at Cynthia Bay are already outside the guidelines of this vision (see Parts I and II), it also believes that an opportunity does exist to correct these past mistakes and implement a long-term sustainable strategic vision for the region. This can be achieved by pulling back some of the existing facilities to Derwent Bridge (such as the existing luxury cabins and some of the PWS buildings at Cynthia Bay) limiting the number of cars entering the Park by provision of a free shuttle bus, and by rehabilitating existing degraded areas). Such an integrated approach would see the Cynthia Bay-Derwent Bridge region develop as a total visitor destination, with the purpose of providing a quality visitor experience, whilst respecting and maintaining the natural and cultural values of the National Park.

PART IV

Overwhelming Public Support

According to the published results of a number of surveys conducted over the past decade, the view expressed in this submission that tourist accommodation facilities are inappropriate within Tasmania’s National Parks and WHA has broad community support. For example:

The main conclusions from surveys of visitor attitudes conducted in the Cradle Mountain-Lake St Clair National Park are:

- Predominantly the present visitors do not wish to see any substantial developments:
- Visitors come to the area to experience the natural world.

(Reported in the 1991 Site Plan for Cynthia Bay)

Based on the more than 600 written submissions received during the Public Participation Program related to the management of the WHA, frequency expressed comments on the subject of visitor facilities in the WHA included:

- Where possible Visitor Services Zones should be located outside the WHA;
- All facilities should be unobtrusive;
- The environmental impact of any facility should be minimal;
- Facilities should not compromise the integrity of the area;
- **All visitor accommodation should be located outside the WHA.**

Generally there was support for keeping the scale of visitor facilities inside the WHA basic because it was considered large developments would detract from the natural values of the area. (Reported in 1991 Site Plan for Cynthia Bay).

71% of respondents to a national survey of attitudes to wilderness and wild rivers conducted by the Australian Heritage Commission in 1996 considered the building of tourist accommodation in such areas as inappropriate. (Media Release by Senator Robert Hill, September 4 1996: www.deh.gov.au/minister/env/96/mr4sep.html)

73% of respondents to a survey conducted by the Examiner Newspaper in Tasmania in late May 2003 did not support commercial tourist developments in Tasmania's National Parks.

Given the overwhelming public support for locating all tourism accommodation outside National Parks and wilderness areas it is incumbent on all parties to reject the present proposal. Only by rejecting the proposal will the primary management objectives outlined in the WHAMP, together with those contained within the original 1991 Site Plan for Cynthia Bay, be achieved.

Conclusion

The TNPA argues strongly that you cannot place facilities such as being proposed within a National Park without degrading the very essence of the natural environment and the World Heritage conservation values for which the area was originally protected. In this regard, the proposal development at Cynthia Bay is contrary to the primary management objectives for the area as outlined in the World Heritage Area Management Plan 1999. As such the TNPA requests that the Department of Environment and Heritage, the Tasmanian Parks and Wildlife Service and the Central Highlands Council reject the present proposal. Excellent opportunities exist for the provision of tourist accommodation facilities outside the National Park and WHA, while at the same time excellent opportunities exist for enhancing the appreciation of the natural values within the National Park.

The TNPA supports the principals of the integrated vision articulated by the PWS for the Cradle valley region at the northern end of the Cradle Mountain-Lake St Clair National Park in which all accommodation facilities will be located outside the park and recommends that a similar approach be developed at the southern end of the same park in relation to the Cynthia Bay-Derwent Bridge region. In this regard the TNPA also supports the vision outlined in the PWS Strategic framework for visitor services in Tasmania's parks and reserves:

“Everyone who visits our parks and reserves is there to experience the natural and cultural areas at first hand: to be immersed in areas that feel largely untouched: to experience their beauty and tranquility” (Strategic Framework)

The TNPA looks forward to supporting the PWS achieve this vision.