

19 October 2018

Director of National Parks and Wildlife  
GPO Box 1751  
Hobart TAS 7001

## Dove Lake Viewing Shelter

### Draft Development Proposal and Environmental Impact Statement (DPEIS) October 2018

The Tasmanian National Parks Association considers the current consultation is too limited in scope and hence inadequate. The public is being asked to comment on the design of one relatively minor component<sup>1</sup> of the Cradle Mountain Master Plan without there having been any opportunity to express an opinion on the merits or otherwise of the overarching plan.

**The important issue is not the architecture of the proposed viewing shelter; it is the rationale for transforming the experience of visiting Dove Lake into a view from indoors, through a window (an explicitly stated objective of the design is to ensure that visitors get their first sight of Dove Lake from within the viewing shelter). This is not what national parks are all about!**

I have participated in two meetings with senior PWS staff and the consultant planners in relation to the viewing shelter proposal. At both *I requested explanation of the rationale for providing such as building but neither PWS nor the planning consultants were able to provide it.* They explained that it addressed issues such as the need provide shelter and to manage the flow of visitors but there was no acknowledgement that there are alternative solutions which would address these concerns without the construction of the proposed inappropriate structure. This suggests major deficiencies in the process which led to the proposal. The steering committee overseeing the implementation of the Cradle Mountain Master Plan appears to be dominated by public servants and industry representatives who have lost sight of their fundamental objective to present the outstanding natural and cultural values of the Tasmanian Wilderness World Heritage Area.

The unique attraction of Tasmania is that it is not yet overdeveloped – surveys consistently show that wilderness, nature and heritage are among visitors' top priorities. It must be acknowledged that such experiences are fundamentally incompatible with excessive visitor numbers and that there is very limited scope to deal with ever larger volumes of visitors by the construction of ever more infrastructure in our national parks without diminishing the experience that attracted them here in the first place.

Of particular concern is the ongoing uncritical implementation of the Cradle Mountain Master Plan. This tourism industry thought bubble is more likely to make Cradle Mountain a laughing stock than to make it Australia's premier national park. The proposals contained in this 'plan' have never been exposed to critical scrutiny yet it is being used as justification for

---

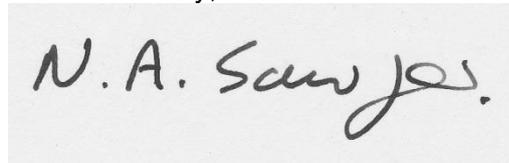
<sup>1</sup> See Attachment 2 for specific comments on the viewing shelter as proposed.

the provision of unnecessary and intrusive infrastructure in our most spectacular national park.

The TNPA agrees that the existing facilities at Cradle Mountain are long overdue for upgrading and the existing Dove Lake carpark should be put to better use, but there has been no consideration of alternatives which could greatly improve the visitor experience<sup>2</sup> without fundamentally changing it into something more isolated from the natural environment (see, for example, Attachment 1), which will be the outcome of the current proposals. Why is the public being asked to comment on the *fait accompli* of a massive viewing shelter that will further isolate visitors from nature when we could use the removal of cars from the carpark to provide visitors with a better, more appropriate and more natural experience?

The recent major upgrade to the shuttle bus service will cater for projected visitor numbers for the next few years. There is still time to revisit all aspects of the Cradle Mountain Master Plan (including the proposed viewing shelter) and its driver, the policy of encouraging ever-increasing tourist numbers, so that they do not diminish the opportunity to experience wild nature which is the Tasmanian tourism industry's key competitive advantage.

Yours sincerely,

A handwritten signature in black ink on a light grey rectangular background. The signature reads "N. A. Sawyer." in a cursive, slightly slanted script.

Nicholas Sawyer  
President, TNPA

**Attachment 1** – An alternative vision for the future of the Dove Lake Carpark

**Attachment 2** – Specific comments on the viewing shelter as proposed

---

<sup>2</sup> Other aspects of the Dove Lake visitor experience, such as the use of the entire area between Glacier Rock and the boatshed, were mentioned in discussion but these should have been part of a holistic consideration of the best use of the whole area put forward for consideration by stakeholders.

## **Attachment 1 – An alternative vision for the future of the Dove Lake Carpark**

*This is provided as an example – it is not claimed to be the best or only solution*

The aim is to improve the visitor experience without fundamentally changing it into something more isolated from the natural environment. It is based on practical considerations and informed by the outcome of PWS surveys of actual visitors such as that quoted in the DPEIS Appendix C, page 8, namely to minimise crowding around Dove Lake and to minimise infrastructure at Dove Lake.

Ultimately, the only way to maintain a natural, uncrowded experience, and avoid the need to provide ever increasing transport and infrastructure, is to limit visitor numbers. Further research is needed to determine where to set the limit. The mechanism to control visitor numbers already exists – visitor numbers on commercial trips are already controlled by PWS and the recently introduced restrictions on private car access (supported by TNPA) mean that the shuttle bus service is the only means of access for most other visitors. The number of shuttle bus seats available (a management decision) is the major factor determining the number of visitors at Dove Lake at any one time. An on-line booking system for shuttle bus seats could easily be implemented to avoid any need for queueing.

Design considerations for physical infrastructure:

- Minimise the size and amount of infrastructure.
- Minimise intrusiveness and visibility of all new facilities.
- Achieve a substantial reduction in footprint and no extension to the already disturbed area.

Vision for physical infrastructure:

- Close and rehabilitate most of the existing carpark. Use the area to provide lookout(s), interpretation and infrastructure to manage visitor flow.
- Provide shuttle bus turning loop and boarding facilities somewhere towards the rear of the existing carpark.
- Provide a building to shelter the often ill-equipped visitors from the weather somewhere towards the rear of the existing carpark (see comments in attachment 2 below re functional requirements). This may provide some views from within but it should not be designed to be the main viewing location.
- Provide more toilets.
- Provide potable water, but no other supply of food or beverages.

## **Attachment 2 – Specific comments on the viewing shelter as proposed**

1. Weather – The most important function of any building in this vicinity is to provide shelter from weather:
  - a. In fine, pleasant weather most visitors will want to be outside – the proposed structure will be almost empty and will obstruct visitor movements.
  - b. On hot, sunny days its most important function will be to provide shade while visitors wait for the shuttle bus. In the absence of any apparent ventilation system, it appears that the proposed viewing shelter could be sweltering by late on a sunny summer afternoon leaving visitors with nowhere to escape the heat.
  - c. In cold, wet, or windy weather its most important function will be to provide shelter from the elements, the view (which is likely to be limited in these conditions) is much less important.
2. Any proposal to provide food and beverages is strongly opposed. This is inappropriate, it will lead to litter problems and pressure to upgrade to a café or restaurant. The provision of potable water is supported but this can be provided without any sort of kiosk.
3. The desired experience described in draft DPEIS 2.4.1 is to encourage a meditative and reverent appreciation of the landscape. This is supported and should be a major design consideration regardless of the solution that is finally adopted. The difficulty of influencing visitor behaviour is appreciated but the removal of facilities which encourage irreverent behaviour is an obvious starting point. Currently, one of the greatest detractors from a reverent appreciation of the landscape is the frequent appearance of a small number of noisy visitors in brightly coloured kayaks in Dove Lake immediately in front of the majority of visitors. The commercial kayak concession should be terminated immediately.