

18 June 2019

Mr Jason Jacobi  
General Manager  
Parks and Wildlife Service  
GPO Box 1751  
Hobart TAS 7001

Dear Jason,

## **Waterfall Valley Redevelopment – Revised RAA 3465**

TNPA has previously (24 April 2019) commented on Reserve Activity Assessment (RAA) 3465 as part of targeted stakeholder consultations. At that time we made a number of criticisms regarding the inadequacies of the RAA and the selective consultation being undertaken. We are pleased to see the RAA has now been made available for broader public input, and its planning context has been clearly described.

Our earlier submission contained a number of comments and criticisms of the project itself many of which remain relevant and the following mostly repeats these. We have repeated them here in order for them to be part of this now-public consultation process.

One of our previous criticisms was that the RAA was presented as merely a replacement of existing structures. The RAA Executive Summary still fails in this regard. We note that it now explains that an earlier RAA approved works associated with the proposed camping platforms and toilet so, technically, RAA 3465 concerns just the huts. But, while attempting to utilise existing footprints in some instances, the overall project is just not “to replace the public and ranger huts at Waterfall Valley”. There is no real existing ranger hut (just an annex and outlying ‘Apple’ shelter), and there are also new toilet, new hardened tracks and camping platforms proposed, and the locations and footprints are larger than existing structures. In essence, the project is a whole-of-site redevelopment and should be more clearly presented as such.

In our previous submission, we supported the Key Desired Outcomes listed in the Design Brief (attachment 3, August 2018, p.4). These KDOs seem to have disappeared from the repackaged RAA, replaced by more structure-specific specifications in section 1.2 and 1.3, but we hope the previous versions remain uppermost in the designer’s and builder’s minds.

### **Old Waterfall Valley Hut and grassland camping**

None of your documentation notes or clarifies the future of the old (1950s) Waterfall Valley Hut, although ongoing use as an “emergency shelter” is implied. And what is the future of camping use of the nearby grassland (in fact, this integral component of the site is mostly cropped from any maps presented)? Even if no changes are

proposed to the use of these areas the RAA should be about the entire site redevelopment and so note and acknowledge this.

The nearby grassland area has traditionally provided the most expansive camping area at Waterfall Valley, and has proven remarkably resilient, but ecologists have expressed concerns regarding camping impacts here in the past. It would have been prudent to at least seek further such advice when the natural values assessment of the rest of the greater site was undertaken. Regardless, a clear statement on the future camping intent for this grassland, and how that relates to the need for and number of tent platforms proposed to be constructed is required.

### **Hut design and layout**

In documentation associated with the previous version of the RAA it was noted that key messages regarding the new hut structures will include “energy efficiency”, “thermal performance”, and the “simple” nature of the accommodation provided. It is encouraging that section 1.3 indicates substantial insulation and passive heating as a primary heat source. But we note the provision of solar power is also proposed to provide for supplementary heating. We hope this is all. This and other aspects of the nature of the proposed structures are of particular interest to us (especially given excesses, like charging stations, at the 2016 Lake Tahune public hut).

It appears all new facilities are to be located off the Overland Track, which we support, but some earlier documentation indicated the Overland Track itself is to be re-routed through the new complex of buildings. This is not clarified in the RAA which, as noted above, lacks explicit consideration of many aspects of the overall site redesign.

It is not made clear how much, if any, of the existing Waterfall Valley Public Hut’s structure is to be reused (as proposed in the 2016 Site Concept Plan; appendix 1) but perusal of the Concept Hut Design (appendix 2) suggests maybe not much? This should be clearly stated.

We are also pleased to note the new Ranger Hut design (appendix 2) appears to be for a simpler structure than that associated with Bert Nicols Hut.

We strongly support the use of existing disturbance footprints where possible for all the new structures. Nevertheless we note the new public hut’s footprint appears notably larger than the existing one, the Ranger’s hut seems somewhat larger than the current toilet site that it will occupy, and the new toilet (if similar to the current one) will be larger than the current Ranger’s igloo (location is inferred it from references in the RAA and appendix 2, but no site diagram shows this). This should be clearly stated, given the additional impacts that will ensue (is only really apparent in diagrams associated with appendix 5 for greywater design). Note also our concerns below when the impact footprint of bushfire mitigation measures are included.

### **Environmental impacts**

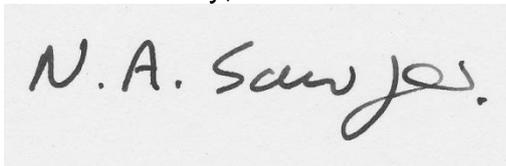
Documentation associated with the previous version of the RAA noted that “protecting environmental and wilderness values” was an over-arching objective of the project. It further indicates a Key Desired Outcome is that the facilities do not detract from walkers’ wilderness experience. This now seems replaced by a broader objective (p. 5) from the TWWHA Management Plan. We hope the application of this objective is more in keeping with the earlier version.

It is pleasing to note potential impacts on wilderness noted in the RAA but the statement “the proposal is highly unlikely to change the current wilderness quality” (p.21) does not imply rigorous consideration of these aspects of the proposed development. And the RAA is only considering the new huts, not the overall site redevelopment. The RAA’s conclusion may well be true but it should be demonstrated by a proper analysis of wilderness quality (wild character). This should be a standard part of all RAAs for developments such as proposed, as natural values assessments are. Visual assessments (like appendix 4) may feed into this but are not the same thing.

The Natural Values Assessment (appendix 3) recommends against some previously proposed locations of camping platforms due to potential impact on sphagnum communities, although it did also note “with careful planning and construction practices, it may be possible to locate some platforms within the eastern portion of the area in which they are currently proposed, working around Sphagnum patches, however this option would need to include measures to minimise ongoing disturbance of vegetation by platform users.” This is hardly an enthusiastic endorsement of the proposal and we wonder what alternative locations have been considered. This is of particular concern given their imminent construction (also see above).

It appears the new buildings are to be surrounded by a two metre wide “fuel modified zone” to reduce bushfire hazards (p. 25) which may involve clearing of flammable heath and/or “conversion to marsupial lawn”. This substantially increases the impact footprint of the structures (which are already larger than the existing buildings) which is a concern.

Yours sincerely,

A handwritten signature in black ink on a light grey background. The signature reads "N.A. Sawyer." with a stylized flourish at the end.

Nicholas Sawyer  
President, TNPA