Tasmanian National Parks Association

An independent Voice for Tasmania's Parks

Public Works Committee
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Submission regarding Next Iconic Walk

Introduction

The Tasmanian National Parks Association Inc. (the TNPA) has a particular interest in the management of reserves in Tasmania for protecting and conserving the state's natural and cultural values and so welcomes the opportunity to provide this submission to the Public Works Committee on the proposed Next Iconic Walk in the Tyndall Range.

National Parks and reserves are Tasmanian's most precious public land, by virtue of their important environmental, cultural, and recreational values. Any development that occurs on the National Park estate should be subject to the most rigorous process and standards.

Many of the TNPA's long-standing fundamental concerns with this proposal remain (see: https://tnpa.org.au/tyndalls_project_update/). Our major concerns can very generally be summarised as follows, with further details provided below:

- While 35 possible locations were assessed for the Next Iconic Walk in 2019, the selection process lacked transparency, with little to no information made public about the proposals submitted or the selection criteria used[1]. Furthermore, while two multi-day walk options in the Tyndall Range were considered during the 2021 Feasibility Study, a third option of developing or upgrading a series of day walks accessible from Queenstown, could potentially offer greater economic benefits to the local area, cater for a wider demographic, cost considerably less, and have less destructive impacts on wilderness and other values.

- The feasibility study for the proposal was carried out in 2021 and, in our view, was based on questionable and now outdated assumptions, many of which are discussed below. Given the current publicly available information and the state's dire budget situation together with other large demands on the state's budget, it is imperative that an updated feasibility study assessing the true likely cost of the proposal is undertaken to form the basis of the Committee's decision-making. Without such current financial analysis, it would be difficult for the committee to assess the project's financial viability, its value to the Tasmanian public and the advisability of it proceeding.

[1] See https://tnpa.org.au/next-iconic-walk-how-did-the-tyndalls-get-chosen/

- Since the $40 million budget was identified in 2021 (already inflated from the original $20 million in 2019), there have been significant project design changes, including additional huts to be built, and higher than general inflation (particularly in relation to construction costs) influencing project costs. The amount budgeted ($40 million), is therefore highly likely to be inadequate; the similar Three Capes Track cost three times that estimated. The proposal was only considered marginally feasible in 2021 and is no doubt much less financially viable now.

- The region to be traversed by the proposed Next Iconic Walk – the Tyndall Regional Reserve and the Lake Beatrice Conservation Area – is undeveloped and adjacent to the Tasmanian Wilderness World Heritage Area (TWWHA). There are strong and long-standing arguments for incorporating these reserves into the adjacent World Heritage Area and that these areas be managed to protect such values.

- The Environmental Impact Statement (EIS), released in October 2025, acknowledges that the area has significant environmental values which could potentially be damaged. While it states that the design will ensure that there will be no significant environmental impacts during construction and operation, it nevertheless fails to acknowledge the impact major infrastructure developments will have in degrading the area's wilderness values, and also fails to identify or discuss views expressed in public responses to the project's 2021 Feasibility Study.

- The climate in the area proposed for the walk is cold, wet and cloudy for much of the year. There is no guarantee that a walk in these conditions would attract the numbers envisaged in the feasibility study, and the climate would place greater demands on the infrastructure. Indeed, the initial 2019 Next Iconic Walk assessment report rated the climate in the Tyndall range as presenting "challenging impediments." The maintenance costs of the Three Capes Track, in a much kinder climate, are greater than the income received. In addition, there are significant safety concerns given the number of search and rescues carried out in Tasmania's high country in recent years.

In summary, for both financial and other reasons, this project would not be a good use of public money: it is based on outdated costs and questionable assumptions and its value for the Tasmanian public has not been demonstrated. It is clearly not necessary, nor, as discussed in detail below, would it be advisable for it to proceed.

The TNPA remains of the view that the Tyndall Range is an inappropriate location for the proposed Next Iconic Walk development, and that the expenditure of the $40 million budget on other options could potentially benefit West Coast tourism just as much, if not more.

Specific comments

Financial and cost/benefit analysis

- Given significant increases in construction costs since 2021, significant changes in project design, including additional huts to be built, and the typical situation re cost overruns on

government infrastructure projects, it seems highly likely the project cost will be more than the $40 million budget (noting that construction of the Three Capes Track ultimately cost nearly three times its original $12 million estimate). Furthermore, the lack of an existing regional Parks and Wildlife Service (PWS) presence in Queenstown means that a new construction base for the track will need to be established, and will no doubt add to the project cost. Given the present crisis in the State's budget (see Attachment 1), now further impacted by the large call on State funds for the new AFL stadium in Hobart and wharf facilities required in Devonport, it is best to abandon the project.

- The 2021 Feasibility Study cites modelled figures of the project running at a profit based on the Three Capes Track model. However, this model is now known to be incorrect. The Three Capes Track had an initial project construction cost blow-out (see above), while figures for maintaining and running the track tabled in Tasmanian Budget Estimates 2024 showed annual losses since 2023 (see Attachment 2). For example, the annual operating cost of $2.9 million estimated in the 2021 feasibility study for the proposed Next Iconic Walk is likely to be a gross underestimate given the operating cost for the Three Capes Track in recent years has exceeded $6 million. Therefore, claims that the publicly owned Next Iconic Walk will make money have not been demonstrated. Expenditure losses on the Next Iconic Walk, together with ongoing losses on the Three Cape Track, would have significant consequences for the annual budget of the PWS and the ability of the PWS to service existing and other management needs and demands.

- According to the EIS "The Proposal is designed to operate year-round…with an expected range of 6,500–8,000 visitors per year, corresponding to 40–50% of capacity year-round or 50–67% over the peak 9 months. The feasibility of the proposal was based on a more conservative estimate of 5,450 walkers over a (shorter) 6-month walking season at approximately 60% capacity" (p. 35). Using the suggested potential walker registration fees quoted on page 30 (averaged over the usage of each accommodation option) the revenue accrued from 5,450 walkers is around $2.8 million per year, while for 6,500–8,000 walkers the revenue accrued would be between $3.32 million and $4.08 million per year. If the annual maintenance costs associated with the walk are comparable to those of the Three Capes Track (which have been in excess of $6 million in recent years) then this would imply that the Next Iconic Walk will be running at a large deficit. Again, this would have significant consequences for the annual budget of the PWS and the ability of the PWS to service existing and other needs and demands. This conclusion contradicts the statement on page 30 of the EIS that "The operation of the Proposal will be fully funded using revenue generated from walking fees."

- The economic justification for the proposed Next Iconic Walk is that it will provide increased visitation and associated socio-economic benefits to West Coast communities (and Tasmania more broadly). However, the potential benefits remain untested. Indeed, it would be useful to undertake an analysis of the economic benefits which may have flowed to the local economies of the Tasman Peninsula following construction of the Three Capes Track. It is also interesting to note that in the cost-benefit analysis described in the 2021 Feasibility Study, three walk options were compared. (1) a three-day, two-night option, (2) a two-day, one-night return walk, and (3) a benchmark consisting of investment in existing and new part-day and full-day walks. The results indicated a cost-benefit ratio of 12.7 for Option 1, 13.0 for Option 2 and 43.7 for Option 3. One needs to ask therefore that, if benefits

to the West Coast communities is a priority for the Next Iconic Walk, then why was Option 3 not chosen? The TNPA strongly suggests that this option clearly warrants re-visiting and serious consideration.

- The 2021 Feasibility Study also states that "the track is likely to be unique and not easily 'substitutable'. For this reason, track users are not likely to be particularly price sensitive. Therefore, the demand curve for using the track is likely to be relatively 'inelastic'." (p. 93) This assumption is demonstrably incorrect as there are many existing overnight walk options in Australia (and to some extent in Tasmania). This has also recently been commented on in the media (see https://www.theguardian.com/travel/2025/oct/18/australia-great-walks-nsw-queensland-tasmania) So clearly there is competition for potential Next Iconic Walk customers, and price will need to be aligned with these alternative options. This is especially the case for the present proposal given the weather constraints associated with locating the Next Iconic Walk in the Tyndall Range.

Impacts on wilderness and environment

- The Next Iconic Walk project involves construction of a significant amount of infrastructure in a currently wild and natural area. Such areas are increasingly rare and should be treasured and managed as-is, not degraded by the agency charged with their protection. As noted on page 6 of the EIS:
  - the proposal represents significant change of use and scale of development within the Tyndall Regional Reserve and Lake Beatrice Conservation Area.
  - significant environmental values are present.
  - the proposal has the potential to impact on environmental values.

- The existing land tenure, regional reserve and conservation area, fails to reflect the area's outstanding natural values and instead provides sufficient management flexibility to allow for another major development on reserved land. In fact, one of the reasons for selecting the Tyndall Range for the proposed development was this 'flexibility', unencumbered by a management plan. However, there are strong and long-standing arguments for incorporating the Tyndall Regional Reserve and the Lake Beatrice Conservation Area into the adjacent Tasmanian Wilderness World Heritage Area (TWWHA) and to be managed accordingly. There have been several proposals from eNGOs for this to happen from the 1970s to 2015 (for example, see here[2]), and even from the PWS in 1990 (see here[3]).

- Wilderness Quality in the proposal area was mapped in 2006 and 2015 as part of the wilderness mapping exercises for the adjacent TWWHA. The proposal area lies within an area of Wilderness Quality value 10-12. While this is not considered High Quality Wilderness (the threshold for which is 12), it still affirms that the area is wild and undeveloped. Construction of the Next Iconic Walk would undoubtedly reduce Wilderness Quality (value), in both the immediate area of the proposal and beyond. Apart from a brief acknowledgement that the project site has "wilderness value" (p.56), this impact has been totally ignored in the EIS, being neither discussed nor assessed. This is a serious omission,

[2] Geoff Law, Western Tasmania: A Place of Outstanding Universal Value, 2009. https://tnpa.org.au/wp-content/uploads/2017/08/Western-Tasmania-A-Place-of-Outstanding-Universal-Value-.pdf

[3] Department of Parks, Wildlife and Heritage, 1990. The Appropriate Boundaries of a World Heritage Area in Western Tasmania. https://tnpa.org.au/wp-content/uploads/2017/08/TWWHA-Approp-Boundary-Report-1990.pdf

more so because the RAA guidelines (and this EIS is a RAA), in the past at least, have required consideration of the wilderness impacts of any proposal being assessed.

- The EIS states on page 43 that "The accommodation nodes and other built infrastructure have been designed to blend in with the natural environment and minimise the visual impact…" Elsewhere "The built infrastructure has been designed to be connected with, and complimentary to, the natural environment / landscape." This is entirely subjective, as any piece of infrastructure (particular if large like the proposed accommodation nodes) placed in a wild area will be viewed by many as a "blot on the landscape". Furthermore, there are several serious flaws in the Visual Impact assessment, which indicates that the above conclusion is not valid (see Attachment 3).

Impacts of weather on walker safety

- The EIS states on page 102 that "The climate is cool temperate, with an annual mean minimum temperature of 4.2C and a mean maximum temperature of 12.1C." However, the numbers quoted here are not correct as they are the mean temperatures in December (see Table 6.5). The above sentence should read: "The climate is cool temperate, with an annual mean minimum temperature of 2.8°C and a mean maximum temperature of 8.7°C". So quite cold! The rainfall figures are also daunting: with an average 3,709.1 mm/pa – almost 4 metres – over 217 days/year (1997–2023, quoted in EIS pp. 102-3). If the wetter and harsher weather conditions in the Tyndall Range, especially outside the summer months, deters walkers then this will further impact the financial viability of the track. The climate is also likely to make maintenance costs proportionally higher than for the Three Capes Track.

- The EIS also states that "At this altitude the track and hut sites will experience snowfall on occasions but given the altitude it is not expected to persist for extended periods. At higher altitudes track markers will be installed to assist in navigation when snow is on the track." These statements are an acknowledgement that the weather will be harsh at times, which is concerning. Indeed, the mountains of western Tasmania are associated with some of the wettest and wildest weather in the state, acknowledged in the initial 2019 Next Iconic Walk assessment report which rated the climate in the Tyndall range as presenting "challenging impediments." Despite these conditions, the Next Iconic Walk (as with the Three Capes Walk) is expected to attract non-regular bushwalkers and exposing them to harsh weather conditions on occasions will no doubt lead to safety issues and the potential need for people to be rescued, or indeed could lead to loss of life, as has happened in Tasmania several times over the past year. The fact that snow markers and poles will be installed at higher altitudes to assist navigation (see p. 108) attests to this concern. This is unlike conditions on the Three Capes Track where the weather is much milder and not subject to the extremes associated with higher altitudes. Noting that the Milford Track in New Zealand experiences higher rainfall is not a fair comparison, as this latter walk is mainly limited to valley floors and only briefly reaches higher altitudes where harsh weather conditions are expected. While the EIS states that "The Emergency Management Plan will include a procedure for informing visitors of extreme weather and include thresholds for track closures or delayed progression on the track" (p. 107), what, if any, contingencies have been prepared to stop people starting the walk in extreme weather conditions, or if such weather is forecast? If the wetter and harsher weather conditions in the Tyndall Range, especially outside the summer months, deters walkers then this will further impact the financial viability of the track.

Commercial use and exclusion of public from reserved land

- The EIS states on page 35 that "Unlike the Three Capes Track and Overland Track enterprises, the Proposal does not provide for privately owned and run huts within the Proposal Site. Operators guiding private tours on the walk will have access to the same accommodation as the general public, the same booking procedures and conditions." What provisions will be made to ensure that the public has first option for bookings, and that private groups do not restrict or displace public bookings? Otherwise, the walk will become a costly taxpayer-supported endeavour for the ultimate benefit of private businesses.

- The EIS states on page 35 that "Access to the walk is intended only for registered walkers. Access to the start and from the end of the walk will only be by designated shuttle bus. The access roads will have locked boom gates." This constitutes a concerning restriction on access to public reserved land. It is also not clear whether the cost of the shuttle bus will be included in the registration fee.

Conclusion

The TNPA remains of the view that the location of the proposed walk is inappropriate, and that the expenditure of the $40+ million budget on other options could have benefited West Coast tourism just as much, if not considerably more. The benchmark option outlined in the 2021 Feasibility Study, consisting of investment in existing and new part-day and full-day walks and which could potentially offer greater economic benefits to the local area, cater for a wider demographic, cost considerably less, and have less destructive impacts on wilderness and other values clearly warrants re-visiting and serious consideration.

Indeed, the 2021 Feasibility Study is out of date and should not be used as the basis of current decision-making. It is imperative that an updated feasibility study assessing the true likely cost of the proposal is undertaken to form the basis of the Committee's decision-making. Without such current information, and in the context of other major demands on the already strained State budget, the proposal should be rejected.

The TNPA looks forward to meeting and making a presentation to the Committee at the public hearing to be held in Queenstown on 10-February. Furthermore, to assist the Committee in its deliberations, we request that the Committee ask the proponent the following questions:

Questions to the Committee

Since the $40 million budget was identified in 2021 (already inflated from the original $20 million in 2019), there have been significant project design changes, and higher than general inflation (particularly in relation to construction costs) influencing project costs. What is the current estimated cost of the project, and what impact is this expenditure likely to have on the State Budget given present poor state of this Budget and other high costs demands?

The 2021 Feasibility Study cites modelled figures of the project running at a profit based on the Three Capes Track model. However, this model is now known to be incorrect, with figures for maintaining and running the Three Capes Track tabled in Tasmanian Budget Estimates 2024 indicting annual losses since 2022-2023. Given that the harsher weather is likely to significantly impact walker numbers, and the likely higher maintenance costs, how can it be demonstrated that the Next Iconic Walk will make money? And how would ongoing

expenditure losses on the Next Iconic Walk, together with ongoing losses on the Three Cape Track, impact the annual budget of the PWS and the ability of the PWS to service existing and other management needs and demands?

Given that the 2021 Feasibility Study is now out of date, and should not be used as the basis of current decision-making, what if any plans are there to undertake a new feasibility study assessing the true likely cost of the proposal?

If benefits to the West Coast communities is a priority for the Next Iconic Walk, then why was the option of investment in existing and new part-day and full-day walks, which the 2021 Feasibility Study indicated a much higher cost-benefit ratio to the West Coast communities, not chosen? The TNPA strongly suggests that this option clearly warrants re-visiting and serious consideration.

The climate in the area proposed for the walk is cold, wet and cloudy for much of the year, acknowledged in the 2019 Next Iconic Walk assessment report which rated the climate in the Tyndall range as presenting "challenging impediments." What guarantees can the PWS give that a walk in these conditions would attract the numbers envisaged in the feasibility study? And what, if any, contingencies have been prepared to stop people starting the walk in extreme weather conditions, or if such weather is forecast?

The region to be traversed by the proposed Next Iconic Walk – the Tyndall Regional Reserve and the Lake Beatrice Conservation Area – is undeveloped, has a high wild character, and there have been strong and long-standing arguments for incorporating the area into the adjacent Tasmanian Wilderness World Heritage Area (TWWHA. Construction of the Next Iconic Walk would undoubtedly reduce Wilderness Quality in both the immediate area of the proposal and beyond. Why was assessment of this impact totally ignored in the EIS, given that the RAA guidelines require consideration of the wilderness impacts of any proposal to be assessed?

Yours sincerely,

Robert Campbell

Vice President - Tasmanian National Parks Association

Attachment 1. Comment in The Age: 30-October-2025

Tasmania's fall would hit all of us

Opinion

It sounds like something out of a movie.

On the morning of March 12, 1932, then NSW premier Jack Lang and some state Treasury officials visited two major banks in central Sydney. They carried suitcases that would soon be filled with millions of pounds.

The money was taken back to the NSW Treasury building which featured vaults that had once protected the state's gold holdings. On this occasion, the vaults were stuffed with the cash Lang feared would be confiscated by the federal government to pay NSW debts which the premier was refusing to honour.

Lang's escapades on the streets of Sydney that day occurred the last time a state government effectively defaulted on its debts. The story itself has largely been forgotten as just two months later, Lang was dismissed by state governor Sir Philip Game.

Despite the financial turmoil the state governments of Victoria and South Australia went through in the early 1990s, neither sank to the levels of Lang and his suitcases.

But now there is chatter about which of the states and territories are in financial trouble. And there's one at the top of that list.

Tasmania.

New treasurer Eric Abetz (a former federal minister under Tony Abbott) is set to deliver the state's latest budget next week. In terms of the difficulties facing Abetz, try getting a camel through the eye of a needle.

The utter mess of the state's finances was laid bare by the Tasmanian Treasury just ahead of the July state election.

Annual interest costs, for instance, are expected to climb by 202 per cent between the just completed financial year and 2027-28.

General government net debt is on track to rise from $4.2 billion to $13 billion.

Spending has been growing close to 10 per cent a year since the turn of the decade. Revenues have not matched the spending explosion.

Treasury officials used their pre-election outlook report (over which politicians have no control) to paint a picture bleaker than the Tasmanian wilderness in the depths of winter.

"The state budget has a structural problem. Expenses, significantly driven by health demand and costs, are growing at a faster rate than the state's current sources of revenue," it said.

"This structural imbalance has developed over a number of years. Recent state budgets and forward estimates have been defined by increasing deficits and debt. As a state, we are spending more than we earn and the gap is growing."

The department mapped out some options for Abetz and his premier, Jeremy Rockliff. None of them are pleasant.

Warning the growth in state debt is "not sustainable" and will only get worse, it said immediate and sustained action was required. That included spending cuts, possible privatisations and tax increases.

"A combination of revenue and expenditure measures will be required. No single class of intervention is likely to be sufficient to move Tasmania to a sustainable fiscal trajectory," it said.

It also said that if the government moved too quickly to repair the budget (as some fiscal hairshirt types might suggest), then this would provide "negative shocks to the economy in an outlook of economic uncertainty".

You might wonder what this unfolding disaster in Tasmania means to taxpayers in suburban Sydney or Melbourne.

Well, just like Lang back in 1932, if Tasmania fails to get its debt and interest levels under

control, the federal government would be left carrying the can for Apple Isle taxpayers.

Ostensibly, this could be through funnelling more assistance to the state to help it cover certain costs, such as a special grant to help fund Tasmanian hospitals.

It's happened before.

The Howard government effectively took control of the Mersey Hospital in the marginal Tasmanian seat of Braddon in 2007, becoming the nation's only Commonwealth-owned hospital. It was returned to state control, along with $730 million in federal cash, a decade later.

Such a move would upset other parts of the country if it appeared the federal government was bailing out a state which had got itself into a financial pickle.

But it could get more serious.

If Tasmania found it was unable to pay its creditors, it's difficult to imagine a federal government allowing the state to default.

Tasmania has about $1.3 billion in state government bonds maturing in February next year. That includes $265 million held by the Reserve Bank which bought about $1 billion in Tasmanian government debt during the depths of the pandemic to push down state borrowing costs.

A default would affect the ratings of every other state, pushing up borrowing costs for taxpayers from Byron Bay to Exmouth.

Abetz and his team should be bracing for the state's credit rating to be downgraded, no matter what comes out next week. S&P Global, for instance, put Tasmania on a negative outlook when it last examined the state's finances in November last year.

It's gone pear-shaped since then, so Tasmania's credit rating is likely to be cut to AA or even lower with a knock-on effect to the interest rates on its future borrowings.

That should be a warning bell to every state and territory (bar Western Australia, which continues to be funnelled cash by the rest of Australia due to the increasingly disastrous GST deal) that budget management still matters.

Abetz used his first speech to the Tasmanian parliament last year to argue the current generation should not leave debts for future generations "because we are too selfish to tighten our belts".

That rhetorical flourish is about to be utterly tested.

If he fails, watch out for a state premier wandering around with empty suitcases looking for cash.

Attachment 2: Three Capes Track – financial analysis

The following tables are taken from the report "Three Capes Track – financial analysis" which appeared in TNPA News N0. 39: Three-Capes-Track-financial-analysis-2022-24.pdf

Table 1. Three Capes Track actual expenditure by the PWS in 2022–23 and 2023–24.

Expenditure Category	**2023–24 $**	**2022–23 $**
Employee Costs	**1,279,311**	**1,171,989**
Third-party contractors		
Pennicott Bus	590,613	619,418
Pennicott Boat	1,547,324	1,609,436
PAHSMA[1] Check-in	538,593	560,784
Total third-party contractors	**2,676,530**	**2,789,638**
Maintenance & servicing		
Helicopter	554,022	372,788
Accommodation	461,445	429,168
Tracks[2]	284,845	371,455
Other[3]	10,911	178,672
Total maintenance & servicing[4]	**1,311,223**	**1,352,083**
Travel & transport[5]	**231,302**	**210,130**
Promotion & marketing[6]	**211,364**	**201,624**
Other operational[7]	**403,367**	**552,471**
Total expenditure	**6,113,097**	**6,277,935**

Notes:
1. Port Arthur Historic Site Management Authority
2. Includes works on Cape Raoul, Shipstern Bluff, Tornado Ridge, etc.
3. Includes works at Tasman Arch, Remarkable Caves, Fortescue Bay.
4. Includes general minor works & maintenance, infrastructure supplies, cleaning & waste disposal, fire risk management.
5. Includes track ranger overnight allowances.
6. Includes promotion & marketing payments to the Tasmanian Walking Company.
7. Other operating costs include fuel and gas, minor equipment purchases and general administration costs.

Table 2. Three Capes Track income received by the PWS and marketing reimbursement to the Tasmanian Walking Company for 2022–23 and 2023–24.

Income Category	**2023–24 $**		**2022–23 $**
Income from walker bookings	**5,486,117**	**(1)**	**5,076,050**
Income from Tasmanian Walking Company			
Rent	60,357		56,462
Licence fee	239,543		251,851
Total	**299,900**	**(2)**	**308,313**
PWS marketing reimbursement to TWC			
Jul–Sep	71,006		26,787
Oct–Dec	54,376		58,058
Jan–Mar	52,976		97,226
Apr–Jun	68,665		52,612
Total	**247,023**	**(3)**	**234,683**
Net PWS income from TWC: (2)-(3)	**52,877**	**(4)**	**73,630**
Total PWS income received: (1)+(4)	**5,538,994**	**(5)**	**5,149,680**
Total PWS expenditure	**6,113,097**	**(6)**	**6,227,935**
Net Income: (5)-(6)	**-547,103**		**-1,128,255**

Attachment 3: Comments on Appendix R Visual Impact Assessment of the Environmental Impact Statement

A Key Finding of this document is that the location of the proposal is within a Sensitive Landscape: The Tyndall Regional Reserve and Lake Beatrice Conservation Area are a high-quality landscape with significant natural and cultural values (page 7).

Despite this key finding, the visual impact assessment concluded that the Lake Mary and Lake Huntley accommodation nodes will have a low magnitude of change and a low visual impact on the landscape that was therefore considered acceptable. This led to the following conclusion: "The LVIA has demonstrated that the proposed development can be integrated into the landscape in a manner that minimises visual impact." (c.f. page 7).

However, there are a several serious flaws in the analysis, as outlined below, which negates this conclusion.

- In section 2.3.8 it is noted that the landscape feature map is to provide a general overview of the surrounding features based on *'Guidelines for Scenic Values Assessment Methodology and Local Provisions: Schedules for The Scenic Protection Code'.* However, in section 2.3.1 of this Code it is stated that 'The Code provisions are generally focused on protection of skylines and road corridors and provide very limited scope for scenic protection within other landscapes including coastal areas, highly scenic rural areas, river estuaries, etc". The Guidelines used in the assessment are therefore not appropriate for the landscape being assessed in the Tyndall Range.

- The scoring of the two components of the Place's Sensitivity Score for each node (shown in pages 74, 75, 79 and 80) is totally subjective - no references are provided to any objective basis for the scores shown and no opinions other than the reviewers are offered. For example, Lake Huntley is given a score of 4 out of 5 for Naturalness, although it is difficult to imagine a place that presents a more natural setting. Surely it warrants a Naturalness score of 5. This observation reinforces the comment noted in the document that "Certain aspects of the model aim to quantify variables that are subjective in nature" (1.2.4 on page 8).

- The scoring of the People's Sensitivity Score is also totally subjective – again, no objective basis and no opinions other than the reviewers are offered. For all assessed criteria the reviewers give scores of either 1 (Very Low) or 2 (Low) which does not seem to align with the fact that each accommodation node (each of up to 5,600m2 in size, c.f. Table 2.1 on EIS) will be placed in an area of high sensitivity and very high naturalness.

- The Visual Absorption Class for both nodes, determined on pages 81 and 82 to be Class IV, is not correct. Based on the described method, the Visual Sensitivity Score used to determine the Visual Absorption Class will be between 0 and 5. As there are five classes, and assuming that each class is based on an equal range of Visual Sensitivity Scores, the scores associated with each of the five Visual Absorption Classes should be assigned as follows: 0-1 (Class I), 1-2 (Class II), 2-3 (Class III), 3-4 (Class IV) and 4-5 (Class V). It would not be consistent with such a division of the scores that Class V could only be assigned for a Visual Sensitivity Score of 5 (as used in the analysis) when all other Classes are based on a range of scores. As such, using the Visual Sensitivity Score of 4.3 determined for both accommodation nodes, the associated Visual Absorption Class for both accommodation nodes should be

Class V, with the consequence that the Visual Absorption Capacity is Very Low. Comparing this with the Magnitude of Change scores for both nodes of 2.3 (c.f. pages 107), representing a Low score, this is not compatible with the Very Low Visual Absorption Capacity assigned above.

- The photos used to show the proposed build from the two Key Observation Points used in the analysis (c.f. the 50mm equivalent photos on pages 94 and 102) are not representative as they do not show all the built features within the accommodation nodes. For example, the tracks (particularly those between the buildings within the accommodation node), the helipad, or the clearance of vegetation that will be required within the Hazard Management Area around each node (and associated controlled burns) are not shown. There will also be general disturbance due to walker activities around huts. As such, the scores given to components of the Magnitude of Change analysis (pages 95 and 103) will be lower than if all visual elements of the change been taken into consideration. Taking these deficiencies into account implies that the Magnitude of Change score for each node should be higher than the 2.3 presently assigned (c.f. page 104).

- Furthermore, taking into account the subjectively lower than expected scores given to some of the criteria in the Place's Sensitivity Score and the People's Sensitivity Score only reinforces the fact that the Magnitude of Change score is higher than the score that should be given to the Visual Absorption Capacity.

- Despite these methodological flaws, we note the claim on page 5 that the design has been included to 'minimise the visual impact'. However, whether or not the resulting design is acceptable in a wilderness landscape still remains highly subjective and contestable. Any piece of infrastructure (particularly if large like the proposed accommodation nodes) placed in a wilderness area will be viewed by many as a "blot on the landscape."