



22 June 2021

To the Chief Executive Officer, Hobart City Council,

Re: Development Application Number PLN19-345, 100 Pinnacle Road

Please accept this representation opposing the granting of a permit to the Mount Wellington Cableway Company (MWCC) tourism proposal.

This representation is submitted by the executive of the Tasmanian Chapter of the Australian Institute of Landscape Architects.

About the Australian Institute of Landscape Architects

The Australian Institute of Landscape Architects (AILA) is the peak national body for Landscape Architecture. AILA champions quality planning and design for public open spaces, stronger communities, and greater environmental stewardship.

With our members, we anticipate and develop a leading position on issues of concern in Landscape Architecture. Alongside government and allied professions, we work to improve the design, planning and management of the natural and built environment.

In operation since 1966, AILA currently represents over 3 500 Landscape Architects and promotes excellence in planning and designing for life outdoors. Committed to designing and creating a better Australia, Landscape Architects have the skills and expertise to improve the nation's liveability through a unique approach to planning issues via integrated solutions. In doing so, Landscape Architects contribute towards better environmental, social and economic outcomes for all Australians.

kunanyi/Mt Wellington is a natural and cultural landscape of high significance and believe that the proposed development would severely impact on these natural and cultural values.

Specific details supporting this position follow:

The Development Application is for a prohibited use

The proposal is a tourism development which is a prohibited use under the Hobart Interim Planning Scheme (the Planning Scheme).

The Development will have irreparable adverse impact on native vegetation, threatened species and geological values

The proposal involves extensive excavation and stabilisation, and significant vegetation and habitat disturbance and clearing, including two threatened vegetation communities and 'high quality nesting habitat trees' of the Swift Parrot. The proposal does not avoid or mitigate adverse impacts on vegetation and habitat. The

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irreversible damage will prohibit the rehabilitation of the site should it be required in the future.

The access road, car park and base station is covered by the **Biodiversity Protection Code** of the Planning Scheme. The proposed developments are contrary to the protections provided for the natural values within these zones and codes.

The Development Application (DA) fails to gauge and articulate impacts on the heritage values of the mountain

Hobart City Council and the Wellington Park Management Trust maintain a database of historic heritage sites within Wellington Park. Heritage experts have repeatedly recognised the mountain's heritage significance to the city, the State and the nation.

The proposed development does not include Heritage Assessment and Management Plan in the DA however will impact on many of these sites and detract from the mountain's significant heritage values.

The Development Application does not detail engagement with the Tasmanian Aboriginal community.

The WPMP describes kunanyi as a "cultural landscape as well as a biophysical one" and states that the significance of kunanyi "to the Aboriginal communities that continue to inhabit southern Tasmania is known and celebrated" (p 23). It articulates a Key Desired Outcome that "all Aboriginal heritage values are protected and conserved" (p 75).

The Aboriginal Heritage Assessment Report, a largely desktop based study, offers no consideration of the Cultural Landscape values of kunanyi or the Tasmanian Aboriginal community's cultural and spiritual connection to kunanyi and thus, it fails to demonstrate that 'all' Aboriginal heritage values will be protected.

To the original custodians of this region, kunanyi's cultural significance as a source of physical and spiritual sustenance can never really be fully appreciated as so much of that culture has already been stolen. We do not claim to speak for the Tasmanian Aboriginal community but understand that their voice has been unheard in this debate. We urge that the perspective, insight and understanding of Aboriginal Tasmanians be given more prominence.

The Development will result in increased noise and an adverse impact on the quiet enjoyment of the mountain

The proposed noise levels exceed the allowable noise limit in the WPMP and will impact on the 'quiet enjoyment of natural and cultural values of the park' (WPMP). No remedy for this loss of acoustic amenity has been provided in the DA.

The Development Application poorly addresses the significant visual impacts of this large development

The proposal, including pinnacle centre and tower above the Organ Pipes, is located within a landscape identified as having High or Moderate Visual Sensitivity in the WPMP. The WPMP describes the Organ Pipes as an 'outstanding topographical landmark' and it is listed on the Tasmanian Geoconservation register.



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In the Visual Impact Assessment or associated documents provided in the DA, there is no consideration or graphic representation of the summit tower as viewed from the proposed viewing areas within the pinnacle precinct, currently offering a largely uninterrupted view over the city. Most viewpoints selected for the DA's Visual Impact Assessment are distant views and illustrate minimal impact, however these will be visible from much of the surrounding region. Additionally, there is insufficient representation of these views under different lighting conditions and time-of-day variabilities.

There is also no section through the actual cableway to illustrate its relationship to the Mountain or the intrusive scale of this part of the development.

There is also no consideration of the adverse visual impacts of lighting from the pinnacle centre, walkways, car parks, and moving cable cars traversing the mountain. Impacts related to lighting include skyglow, impacts on flora and fauna and views to the mountain. There is no provision of a night-time view within the Development Application, however the light emitting from the proposed development would be significant alteration to the current, predominantly black backdrop of kunanyi's skyline.

Thank you for the opportunity to make this representation on behalf of the AILA Tasmanian Chapter of the Australian Institute of Landscape Architects.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Catherine Wilson AILA".

Catherine Wilson AILA
President – AILA Tasmanian Chapter
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