

Title of Proposal - Twelve Apostles Saddle Lookout

Section 1 - Summary of your proposed action

Provide a summary of your proposed action, including any consultations undertaken.

1.1 Project Industry Type

Tourism and Recreation

1.2 Provide a detailed description of the proposed action, including all proposed activities.

The proposed action involves the following components:

- the construction of a new Twelve Apostles Saddle Lookout (Saddle Lookout) at the area known as 'the saddle' of what is known as Castle Rock, adjoining the Twelve Apostles geological feature;
- new and realigned paths, elevated boardwalks, and associated rest areas;
- removal of existing lookouts and associated paths and infrastructure.

We include a more detailed description of each component of the proposed action below.

The lookout

The Proposed Saddle Lookout would consist of two parallel rectangular elements (hereafter 'North and South lookouts') located slightly inland to the north-east and elevated from the existing saddle lookout. The external dimensions of each lookout would be 48.5 m long, 4.7 m wide and 4.6 m high. The lookouts would be constructed using an internal structural steel truss with difference cladding on the North and South lookouts. The North lookout adopts aluminium cassette cladding in white pearl with internal yellow blush. The South lookout is clad in vertical metal fins in muted tones of red, ochre, brown and dark brown in anodised aluminium with a matt finish with a low specular reflectance. Glass balustrading forms the narrow end addressing the sea above deck level.. The vertical metal fins on the South lookout—described as its 'feathered edge'—are splayed to various angles, provide a shifting of perceived tones depending on position both viewed from within and from another location. Each lookout is cantilevered, the North lookout by 5.5 m, and the South lookout by 18.5m. The North Stick has a 5-degree rotation in cross-section. The Proposed Saddle Lookout is lit only internally and with minimal light levels, consistent with the precinct's objectives of being a 'dark site'.

The Saddle Lookout would provide approximately 380 m² of floor area and 104 m of viewing perimeter. By comparison, the existing Saddle lookout provides 113 m² of lookout and path area and 63 m of viewing frontage. This would represent approximate increases of 330% in capacity and 165% in available viewing perimeter. The Saddle Lookout would provide higher viewing locations of up to 7 m above the existing Saddle lookout.

Construction of the Proposed Saddle Lookout would require four 900 mm piles of up to 20 m deep being driven into the limestone substrate and the construction of a vehicle access path

through approximately 350 m of previously undisturbed scrub. This vehicle access path would be reused as a new pedestrian access path and boardwalk to the Saddle Lookout (see further below).

New and realigned paths, boardwalks and rest areas

The proposed action would involve the construction of 600m of new concrete path and elevated boardwalk to form a new eastern access route, and an additional 200m of new or rerouted path on or adjacent to the existing access part to the existing Saddle and bunker lookouts. This would form an access loop, enabling more fluid visitor circulation. The proposed action would also involve the construction of two new timber-decked 'approach areas' at the foot of each lookout, with timber seating and an opportunity for site interpretation.

Importantly, a consequence of the proposed action would include changed visitor circulation patterns around the Twelve Apostles lookout area, with the introduction of a one-way return loop path which would effectively reverse the direction of their current travel. From the carpark and visitors centre, visitors would be directed along the new concrete return loop path and boardwalk, with coastal views revealed only upon entry to the Proposed Saddle Lookout. Visitors would enter via the north lookout, from which they would obtain their first sight of the Twelve Apostles to the north-west, and circulate to the south lookout, offering views to the south-east toward the 'Gog and Magog' limestone stacks, Gibson Beach and beyond. They would then return along a new, wider concrete path toward the existing main viewing platform.

Removal of existing lookouts, paths and rest areas

The existing Saddle and 'bunker' lookouts and their access pathways beyond the North lookout would be decommissioned, removed and revegetated. This would include the removal of asphalt paths, boards, seated areas, steel balustrades and wires, and at the bunker timber palisade fence and low concrete wall. Part of the existing pathway would be retained as a restricted-access path to allow ranger, service and maintenance access to the footings of the Proposed Saddle Lookout.

1.3 What is the extent and location of your proposed action? Use the polygon tool on the map below to mark the location of your proposed action.

Area	Point	Latitude	Longitude
Twelve Apostles Saddle Lookout Site	1	-38.663100712761	143.10506090484
Twelve Apostles Saddle Lookout Site	2	-38.663117467616	143.105050176
Twelve Apostles Saddle Lookout Site	3	-38.663117467616	143.105050176
Twelve Apostles Saddle Lookout Site	4	-38.663368789965	143.10545787177
Twelve Apostles	5	-38.663444186497	143.105050176

Area	Point	Latitude	Longitude
Saddle Lookout Site			
Twelve Apostles	6	-38.664265165826	143.105050176
Saddle Lookout Site			
Twelve Apostles	7	-38.665588766761	143.10497507415
Saddle Lookout Site			
Twelve Apostles	8	-38.666015999484	143.104395717
Saddle Lookout Site			
Twelve Apostles	9	-38.666158409826	143.10438498817
Saddle Lookout Site			
Twelve Apostles	10	-38.666158409826	143.10422405562
Saddle Lookout Site			
Twelve Apostles	11	-38.666032753657	143.10422405562
Saddle Lookout Site			
Twelve Apostles	12	-38.665655783827	143.10471758208
Saddle Lookout Site			
Twelve Apostles	13	-38.664968854901	143.10461029372
Saddle Lookout Site			
Twelve Apostles	14	-38.664642142976	143.10429915748
Saddle Lookout Site			
Twelve Apostles	15	-38.664214902055	143.10492142997
Saddle Lookout Site			
Twelve Apostles	16	-38.663569847209	143.10473903976
Saddle Lookout Site			
Twelve Apostles	17	-38.663100712761	143.10506090484
Saddle Lookout Site			

1.5 Provide a brief physical description of the property on which the proposed action will take place and the location of the proposed action (e.g. proximity to major towns, or for off-shore actions, shortest distance to mainland).

The Proposed Saddle Lookout would be sited on a rocky promontory known as Castle Rock, within Port Campbell National Park, approximately 12 km south-east of Port Campbell, in south-west Victoria. It is located within the Great Ocean Road and Scenic Environs National Heritage Listed place. To the north-west of Castle Rock lies the Twelve Apostles limestone formation (also included within the NHL place). Despite its name, with the most recent loss of a rock stack in July 2005 the Twelve Apostles today consists of seven limestone stacks. Castle Rock and its immediately adjoining coastline hosts an array of park and tourism-related infrastructure to service visitation to the Twelve Apostles. This existing infrastructure includes four recognised lookouts (further described below), stairs, pathways, drainage culverts and safety barriers, in timber, steel and concrete.

1.6 What is the size of the proposed action area development footprint (or work area)

including disturbance footprint and avoidance footprint (if relevant)?

0.39Ha

1.7 Is the proposed action a street address or lot?

Lot

1.7.2 Describe the lot number and title.Allot 8D Parish of La Trobe

1.8 Primary Jurisdiction.

Victoria

1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project?

No

1.10 Is the proposed action subject to local government planning approval?

Yes

1.10.1 Is there a local government area and council contact for the proposal?

Yes

1.10.1.0 Council contact officer details

1.10.1.1 Name of relevant council contact officer.

Aaron Moyne, Manage Planning and Building, Corangamite Shire Council

1.10.1.2 E-mail

aaron.moyne@corangamite.vic.gov.au

1.10.1.3 Telephone Number

(03) 5593 7104

1.11 Provide an estimated start and estimated end date for the proposed action.

Start date 03/2020

End date 03/2021

1.12 Provide details of the context, planning framework and State and/or Local government requirements.

The proposed action takes place in the context of the following: Victorian state government legislative frameworks, a statutory town planning framework under the Corangamite Planning Scheme, a Victorian national parks (protected area) management regime, and a Victorian Government strategic planning framework. Each is relevant to consideration of the proposed action, and considered in turn below.

Victorian state government requirements

In the context of Victorian State heritage legislative frameworks the proposed action is governed by both the Heritage Act 2017 (Vic) and Aboriginal Heritage Act 2007 (Vic). In relation to the Heritage Act, the site of the proposed action is adjacent to but outside the boundary extent of the Victorian Heritage Register place 'Great Ocean Road' (VHR H2261), and no permit would be required. There are no known archaeological items on the Victorian Heritage Inventory in the vicinity of the site, however it is noted that the Heritage Act provides protection for undiscovered archaeological items, and there is the possibility—however unlikely—that items associated with the Great Ocean Road construction workers' camps may be present. Archaeological monitoring of excavations would therefore take place as part of the proposed action. In relation to the Aboriginal Heritage Act, Cultural Heritage Management Plan (CHMP) number 15179 has been prepared and approved 7 December 2018 for the Shipwreck Coast Masterplan Stage One, which covers the area of the proposed action. The action would take place in accordance with the requirements of the CHMP.

The proposed action received a consent under the Marine and Coastal Act 2018 (Vic). DELWP Ref: SP465714; dated 09 April 2019.

Victorian statutory town planning requirements

The proposed action is subject to the Planning and Environment Act 1987 (Vic) and the Corangamite Planning Scheme. On 15 April 2019, the proposed action received a planning permit (PP2018/112) from Corangamite Shire Council.

Victorian national parks (protected area) management regime

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The proposed action would be situated inside Port Campbell National Park, which is managed pursuant to the Port Campbell National Park and Bay of Islands Coastal Park Management Plan

(September 1998; hereafter 'Management Plan'), prepared and approved under the National Parks Act 1975 (Vic). Among other things, the Management Plan aims to: preserve and protect the natural environment; conserve features of archaeological, historical and cultural significance; provide opportunities for appropriate recreation and tourism; promote and encourage an appreciation, understanding and enjoyment of the park's natural and cultural values and their recreational opportunities; encourage appropriate park use and visitor behaviour; foster a conservation ethic in visitors and an understanding of minimal impact behaviour; and take reasonable steps to ensure the safety of visitors (Part 1.2).

The Management Plan recognises challenges involved in preserving and conserving the rich biodiversity, varied ecosystems, highly significant geological features and cultural values, sense of remoteness and outstanding scenic features of a long narrow coastal strip threatened by intense visitor pressures, the powerful forces of the Southern Ocean and inland development; and in developing and implement sophisticated visitor management infrastructure and systems which ensure that visitors gain access to the outstanding scenery and wide range of other recreation opportunities, and receive the services and facilities that enhance their experience, while ensuring minimal impact on the natural values (Part 1.3).

The Plan recognises that Port Campbell National Park is assigned the IUCN Category II (National Parks) of the United Nations' List of National Parks and Protected Areas. Category II areas are managed primarily for ecosystem conservation and appropriate recreation. It further notes that sections of Port Campbell National Park are also listed on the former Register of the National Estate, in recognition of the area's outstanding natural and cultural values, and its importance as part of our heritage, and that Port Campbell National Park is classified by the National Trust of Australia (Victoria).

The Plan preceded the inclusion of the Great Ocean Road and Scenic Environs on the National Heritage List.

The Plan recognises the following range of natural, cultural, and tourism and recreational values, including:

A stretch of coastline where the wild Southern Ocean meets rugged limestone cliffs, which are being rapidly and spectacularly eroded. Extraordinary geomorphological features, including cliffs, rock stacks, caves, headlands and embayments. A wide range of remnant coastal vegetation types, including important coastal heathlands, which provide a valuable link between other patches of remnant vegetation in the area. High biodiversity, including a remarkable diversity of plants. Significant flora species, including the Metallic Sun-orchid and Swamp Greenhood. Significant fauna species, including the Hooded Plover, Rufous Bristlebird and

Swamp Antechinus. Evidence of Aboriginal activities, including shell middens, stone artefacts, and staircases cut into the coastal cliffs. Shipwrecks off the Parks' coastline relating to important national historic themes, including shipping, navigation, immigration, and trade and communication. Spectacular coastal scenery which has been attracting tourists since the latter decades of the 19th century. World-renowned and highly-accessible coastal scenery, including the Twelve Apostles, one of Australia's tourism icons. Several of the major attractions of the Great Ocean Road touring route. Extensive (though of varied quality) visitor facilities, including interpretation facilities, lookouts, board walks, car parks and walking trails. A wide variety of visitor experiences, ranging from quick views of outstanding scenery at key visitor destinations to isolated, more remote and less-developed sections of the Parks. Impressive natural forces observable in the dramatic scenery, changeable weather and pounding seas. A variety of recreational experiences, including walking, swimming, surfing, diving, fishing and sightseeing.

It also recognises the economic value to the regional economy as a result of high visitation to both Parks.

The Plan includes a series of general management directions relating to resource conservation and park protection (3.2), which relevantly includes:

A strong emphasis will be given to protecting and enhancing the Parks' biodiversity. Significant flora and fauna species and vegetation communities will be given special protection. Previously disturbed areas not required as sites for visitor facilities will be progressively rehabilitated. Visitor access to the Parks' major scenic features will be carefully managed to control impacts on park values, ensure access to a wide range of sites and to ensure high quality visitor experiences. The Parks' significant natural, scenic and cultural values will be protected at sites where visitor facilities are upgraded or developed. Visitor safety will be pursued through regular monitoring of cliff stability and provision of safety information.

The Plan implements a zoning system for park management. The site of the proposed action is zoned 'Conservation', for having 'Coastal habitats of high conservation significance', and is subject to the following general management aim: 'Protect sensitive natural environments and provide for minimal impact recreation activities and simple visitor facilities, subject to ensuring minimal interference with natural processes.'

The Plan notes the vital role played by the parks in fauna and flora conservation in the region (see further Part 3.1 below for updated information).

The Plan includes sections concerning Aboriginal and post-contact cultural heritage (Section 4.5), noting known Aboriginal cultural heritage sites including shell middens, stone artefacts, pre-contact staircases cut into limestone cliffs and at least one known burial site (see Part 3.9 below for updated information). In relation to post-contact cultural heritage, the Plan notes the existence of Glenample historic homestead, the former Clifton Holiday House and numerous shipwrecks.

The Plan includes a section concerning landscape (Section 4.6), which emphasises the impact of the landscape on visitors, with a sense of isolation described as a 'vital ingredient of the attractiveness of the area'. It warns of the high potential for visual impacts on the viewscape, including from development on adjacent land, due to the expansive viewshed the low stature of the coastal heath. It notes that 'Access routes and recreational facilities are essential for the welfare and enjoyment of visitors, and to minimise visitor impacts. However, much can be done to minimise the visual impact of facilities by their careful selection, siting and design'. Aims and management strategies include to:

Minimise visual impacts on the natural landscape, especially as seen from the Great Ocean Road and other access routes and viewing points. Rehabilitate, remove or ameliorate undesirable visual intrusions, including inappropriate car parks. Develop guidelines for monitoring and managing the landscape values of the Parks and abutting areas in accordance with Parks Victoria guidelines. Minimise the impact of signs and visitor facilities in the Parks on the natural landscape of the Parks. Liaise with shires, utility managers and Park neighbours to minimise the impact of existing and new signs and developments on views from the Great Ocean Road and vantage points in the Parks.

The Plan further recognises the significant geological and landform features as being of 'national significance', with the Twelve Apostles specifically noted as an outstanding example (See Part 3.4 below).

The Plan recognises the need to monitor and investigate growing pressures on the Parks and develop strategies to contain these pressures so that natural values are protected and visitor experiences are enhanced. It notes that during summer and autumn, visitor numbers at Twelve Apostles and Loch Ard Gorge often exceed the capacity of the car parking facilities, walking tracks and lookouts, reducing the quality of the visitor experience and creating traffic and park management problems (Section 6.1), and tourist numbers have increased substantially since the Plan was written. The Plan recognises public safety risks associated with the inherently unstable cliff structures, which pose a slipping risk (Section 6.5).

The Proposed Saddle Lookout was identified as a necessary specific action in the Shipwreck Coast Master Plan (Parks Victoria 2015) and its design was informed by both the Shipwreck Coast Design Framework (Parks Victoria 2017) and public consultation process established thereunder.

The strategic planning context for the proposed viewing platform established a concept for the ways in which future generations of visitors would engage with the history and culture of the place. For example, one of the major deliverables identified by the Shipwreck Coast Masterplan was the Twelve Apostles Precinct Masterplan. The objective of the latter document is to eventually deliver a 'Visitor Experience Centre which will become the main entry point and gateway for those visiting the Twelve Apostles' (quoting the Parks Victoria website). In other words, if the full vision for the coast is realised, visitors to the Shipwreck Coast approaching from the east would first be introduced to the history and culture of the region in a modern and contemporary visitors' centre inspired by similar visitor centres around the world (e.g. the Stonehenge Exhibition and Visitor Centre, Wiltshire, UK—which was also designed by Denton Corker Marshall—or the Giants Causeway Visitor Centre in Northern Ireland).

If this vision is realised, the Proposed Saddle Lookout would become a component in a larger integrated visitor experience, which illustrates the need for high-quality design in its construction and the necessity of moving on from the unremarkable and utilitarian designs of last century. This is important because some of the contributory views impacted by the proposed works (discussed in Part 1.17 below) would be those first partial views of the Twelve Apostles when approaching from this direction. Insofar as these views would be impacted by the Proposed Saddle Lookout, these same experiences would be enhanced from this general area through the introduction of the visitor centre envisaged by the Twelve Apostles Precinct Masterplan, should future circumstances permit its construction.

The design rationale for the proposed viewing platform at The Saddle includes subtle but leading-edge architectural design, in preference to the existing underwhelming viewing facilities. The design responds to the stated aim of the Shipwreck Coast Master Plan to 'Enhance the Shipwreck Coast as a distinctive, cultural and remarkable world-class destination'. (Parks Victoria 2015, 5)

It is also generally consistent with feedback received from a range of stakeholders, including representatives of the local Aboriginal communities who provided ongoing input as the viewing platform's design evolved, and tour operators, who welcomed the new facilities. When Parks Victoria invited public comment on the Shipwreck Coast Master Plan (Stage 1) through its online portal the feedback on the design from the wider community was highly mixed, with positive and negative reactions to what had been designed (according to the July 2018 Engagement

Summary). This is typical of contemporary design responses for public infrastructure, which commonly evince contrasting initial public reactions. However, in response to comments received through public submissions, changes were made to the siting, colours and materials of the proposed structure to better meld it with the geology and colour palette of the local landscape.

Stage One implementation of the master plan includes Victorian Government funding of \$9.8 million to improve bridges, lookouts and information technology along the Great Ocean Road, and specifically includes construction of a new lookout structure at 'The Saddle'. Indeed, a representation of an earlier stage of the design of the Proposed Saddle Lookout adorns the cover of the Master Plan Report. The Master Plan was subject to extensive public consultation, including with Indigenous people (see 1.13 below).

1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders.

The Proposed Saddle Lookout was specifically contemplated in the 2015 Shipwreck Coast Master Plan, the preparation for which was undertaken through a five-stage process that included extensive consultation and engagement with the community and key stakeholders. Engagement activities included:

Meetings with representatives from Eastern Maar and Kuuyang Maar;

Community workshops in Port Campbell, Peterborough and Princetown;

Information sessions and community workshops at the Twelve Apostles Visitors Kiosk and Timboon;

Briefings with farmers, landcare groups, local heritage and environmental groups, local tourism operators, Shire Councils, local community focus groups and Peterborough Residents Association;

Stakeholder workshops in Melbourne; and

A dedicated online consultation tool: www.shipwreckcoastyourplan.com.au and

Further engagement in the recent design phase: <https://engage.vic.gov.au/shipwreck-coast-master-plan>

Traditional Owner consultation

The preparation of the CHMP involved consultation with the Registered Aboriginal Party, Eastern Maar Aboriginal Corporation (EMAC) in standard and complex assessment stages in 2017 and 2018. This included meetings with EMAC and Aboriginal Victoria to discuss the

results of the assessments and development of management recommendations.

There has been ongoing collaboration with EMAC regarding development of the Shipwreck Coast Master Plan and design of the Apostles Saddle Lookout, including numerous site visits, formal meetings and walking on Country. This included our design workshops with an EMAC artist in 2018 to incorporate story-telling and cultural interpretation into the Shipwreck Coast Master Plan and design of the Apostles Saddle Lookout;

Broader community consultation

Following a limited design competition involving a selection panel that included the Victorian Government Architect, in 2018 Parks Victoria appointed Denton Corker Marshall to produce designs for Stage One of the Shipwreck Coast Master Plan, including the Proposed Saddle Lookout. Extensive consultation was undertaken to influence and inform the design throughout 2018.

Activities included:

Two community workshops held in Port Campbell;

Online engagement survey available through Engage Victoria;

Workshops with the Office of the Victorian Government Architect (OVGA);

Workshop with the Victorian Design Review Panel;

Licence Tour Operator workshop; and

Consultation with key tourism stakeholders.

The results of this engagement as at July 2018 are summarised in Parks Victoria's Engagement Summary Report Shipwreck Coast Master Plan – Stage One available via: <https://engage.vic.gov.au/shipwreck-coast-master-plan>.

It should be noted here that this consultation concerned a preliminary design, which has been significantly modulated in the final design which is the subject of this proposed action. Most notably, the lookouts were proposed to be high-contrast black and white, and the selection of colours and finishes was significantly developed to soften the appearance in the landscape. Among the key findings of this consultation was that there were mixed positive and negative reactions, with positive reactions among the Eastern Maar Traditional Owner representatives and generally among tour operators. Positive responses included that the structure would have the potential to improve the visitor experience, offering improved views of the coast and reducing dangerous behaviour. Some community workshop participants mentioned that they appreciated the sense of 'drama of being open to the elements'. Negative responses concerning the colour scheme and materials included suggestions that they be altered to better blend the structure into the surrounding landscape. Parks Victoria and the design team were responsive to these consultations, leading to the choice of colour palette and materials that are included in the final design the subject of the proposed action, and which are detailed at Section 4.

1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project.

The Proposed Saddle Lookout has been the subject of a number of assessments relating to its environmental impact. It was included as one of the sites considered for the Shipwreck Coast Master Plan Priority Sites for Infrastructure: Flora and Fauna Assessment (2017) and an associated Shipwreck Coast Targeted Flora and Fauna Survey Report, both by Ecology Australia. These occurred in the context of an assessment to satisfy the Victorian Biodiversity Assessment Guidelines (Department of Environment and Primary Industries, 2017); the Flora and Fauna Guarantee Act 1988 (Vic); and the Environment Protection and Biodiversity Conservation Act 1999 (Cth), including consideration of listed ecological communities and flora and fauna species.

It has further been the subject of an assessment of any potential impacts on the National Heritage Great Ocean Road and Scenic Environs National Heritage place (Twelve Apostles Saddle Lookout: Assessment of Impact on National Heritage Values, Extent Heritage, 2019).

The findings of these reports are discussed, and documents attached, under Section 2 below.

1.15 Is this action part of a staged development (or a component of a larger project)?

Yes

1.15.1 Provide information about the larger action and details of any interdependency between the stages/components and the larger action.

There are future stages of implementation of the Shipwreck Coast Master Plan being undertaken by the Victorian Government.

The Proposed Saddle Lookout forms one part of the Shipwreck Coast Master Plan, to be delivered subject to the availability of funding, internal project viability assessments and statutory approvals. Along with the proposed Port Campbell Pedestrian Bridge, the Proposed Saddle Lookout represents the first two projects to be delivered under Stage One of the Shipwreck Coast Master Plan, which are also the only projects contemplated in the Shipwreck Coast Master Plan currently proposed to be carried out. There is no interdependency between the Proposed Saddle Lookout and any other projects contemplated under the Shipwreck Coast Master Plan, being discrete and self-contained initiatives connected only by their joint-strategic planning context.

1.16 Is the proposed action related to other actions or proposals in the region?

Yes

1.16.1 Identify the nature/scope and location of the related action (Including under the relevant legislation).

Please refer to response to Section 1.15.1 above. The Port Campbell Creek Pedestrian Bridge currently under construction is located approximately 12 km north-west of the site of the proposed action. The site of the Port Campbell Creek Pedestrian Bridge is also included within the Great Ocean Road and Scenic Environs National Heritage place and Port Campbell National Park. All applicable planning approvals have been obtained for the bridge including a planning permit issued by the Corangamite Shire Council, Marine And Coastal Act Consent issued by the Department of Environment Land Water and Planning.

Section 2 - Matters of National Environmental Significance

Describe the affected area and the likely impacts of the proposal, emphasising the relevant matters protected by the EPBC Act. Refer to relevant maps as appropriate. The [interactive map tool](#) can help determine whether matters of national environmental significance or other matters protected by the EPBC Act are likely to occur in your area of interest. Consideration of likely impacts should include both direct and indirect impacts.

Your assessment of likely impacts should consider whether a bioregional plan is relevant to your proposal. The following resources can assist you in your assessment of likely impacts:

- [Profiles of relevant species/communities](#) (where available), that will assist in the identification of whether there is likely to be a significant impact on them if the proposal proceeds;
- [Significant Impact Guidelines 1.1 – Matters of National Environmental Significance](#);
- [Significant Impact Guideline 1.2 – Actions on, or impacting upon, Commonwealth land and Actions by Commonwealth Agencies](#).

2.1 Is the proposed action likely to have ANY direct or indirect impact on the values of any World Heritage properties?

No

2.2 Is the proposed action likely to have ANY direct or indirect impact on the values of any National Heritage places?

Yes

2.2.1 Impact table

Place	Impact
Great Ocean Road and Scenic Environs	The attachment entitled Twelve Apostles Saddle Lookout: Assessment of Impact on National Heritage Values, Extent Heritage, 2019 (Extent Heritage report) provides a comprehensive assessment of potential impacts and the associated mitigation strategies applied. The following summary of the impacts is reproduced from Part 5 (Conclusion): There is a 'real chance or possibility' that the proposed action would: - Obscure landforms or landscape features in a National Heritage place when viewed from some locations that make a contribution to the

Place	Impact
	<p>place's overall heritage values. However, the proposed viewing platform would also enhance views and 'experiences' of other landforms and landscape features in the National Heritage place; - Involve the construction of buildings or other structures within, adjacent to, or within important sight lines of, a National Heritage place which are inconsistent with relevant values, although these would be confined to only some locations and partly mitigated by sensitive design responses. Further, the proposed viewing platform would enhance other critical sight lines in the National Heritage place; and - Make notable changes to the form of a landscape or setting of a National Heritage place in a manner which is inconsistent with relevant values when viewed from some locations, while also improving the ability of visitors to appreciate the setting of the Twelve Apostles when viewed from it.</p>

2.2.2 Do you consider this impact to be significant?

No

2.3 Is the proposed action likely to have ANY direct or indirect impact on the ecological character of a Ramsar wetland?

No

2.4 Is the proposed action likely to have ANY direct or indirect impact on the members of any listed species or any threatened ecological community, or their habitat?

Yes

2.4.1 Impact table

Species	Impact
Southern Brown Bandicoot	<p>Habitat Loss The proposed development will lead to the direct loss of 3931 m² of suitable habitat for this species . This includes areas of pathways and viewing platforms to be constructed, areas to be impacted during construction and 365 m² of existing path to be rehabilitated. See section 1.6 for further</p>

Species**Impact**

information. Impacts due to habitat loss are to be mitigated by: - Locate building site facilities and storage areas on already disturbed areas outside the project area. - During construction, construction activity will be strictly controlled and constrained to the construction footprint via no go zones and fencing, which will be outlined in an EMP. machinery and vehicle traffic will also be minimised as much as possible within the project area. - Follow footprint of existing infrastructure and an old, partially rehabilitated path as much as possible. - Using prefabricated and lift in infrastructure as much as possible to limit disturbance . Fragmentation of habitats

These works have the potential to fragment populations of the listed species. Fragmentation at this site is of particular concern, as the available habitat for these species is limited to a narrow strip (100-300 m wide) of vegetation between the cliff-top and farmland. The proposed walkways and lookouts bisect the entirety of this strip of habitat. This habitat strip also contains the Great Ocean Road. The proposed works have the capacity to fragment habitats at two different scales. First, the new and upgraded/widened paths and viewing platforms will potentially fragment habitats on a small scale. The widths of these including the construction corridor vary from approximately 5-7 m with for paths, 8-12 m wide or junctions and nodes, and up to 30 m wide at the main viewing platforms (“sticks”). This has the capacity to limit connectivity across the project area, and may provide a partial or full barrier to movement for these three species, especially the smaller bodied Swamp Antechinus and Broad-toothed Rat. Second, the habitat that will remain between the two walkways may become less suitable or unsuitable for these three species. As a result, the area impacted may be up to approximately 100 m wide. For approximately 110m, the area of impact including the retained area of habitat will be at least 50 m wide. This may present a considerable barrier to movement for all three species. It is likely that increased habitat fragmentation is a key potential impact arising from the project. Mitigation measures are

Species	Impact
	<p>paramount to reduce fragmentation and include: - Using raised walkways. This will include retrofitting the existing pathway with an elevated walkway for a 10 m section south of the existing underpass under the Great Ocean Road. Portions of the new walkway will be raised. The minimum height of these raised walkways will be 300 mm. - Raised walkways will be made of permeable surfaces to encourage plant growth underneath. - Protective cover will be provided under the elevated walkways. This will take the form of vegetation if light permits, or scattered rocks, logs and potentially vegetation cleared during construction. The cover will be sufficiently open to allow for easy access by small mammals. - Spread cleared vegetation across cleared pathways at night during construction to improve connectivity and reduce potential predation. - Culverts under ground-level pathways could also be utilised to improve connectivity. However these culverts would need to be at least 30 cm in diameter and integrate with the surrounding environment to be effective (Transport and Main Roads 2010, Arizona Game and Fish Department 2006). - Rehabilitate disturbed areas as soon as possible. - Reduce or remove unintentional barriers by smoothing off berms, removing excess soil and ensuring that any fencing is permeable to small mammals. Reduced habitat quality Habitat quality may be reduced in the project area due to a combination of factors, some of which are covered in more detail elsewhere. These factors include: - Increased fragmentation (see above) - Increased invasive species and risk of disease (below) - Clearing may increase sunlight and wind due to the loss of the canopy, which may dry out the habitat and change vegetation communities in the immediate vicinity of the works. These impacts are likely to be most severe for Swamp Antechinus, which prefer wetter habitats. - Increased trampling of vegetation by visitors as access increases. - Increased littering In particular, impacts to the drainage lines to the east and west of the project area need to be avoided, as this habitat is likely particularly</p>

Species**Impact**

important for Swamp Antechinus. Mitigation measures to reduce impacts to habitat quality include: - Mitigating fragmentation (outlined above) - Controlling invasive species and disease (see below) - Reducing the area to be cleared to reduce edge effects. - During construction, construction activity will be strictly controlled and constrained to the construction footprint via no go zones and fencing, which will be outlined in an EMP. machinery and vehicle traffic will also be minimised as much as possible within the project area. - Following construction, a strict “stick to designated paths” policy will be implemented, including signage and enforcement by rangers with patrols,. Constructing elevated walkways also reduces the likelihood of trampling by visitors. - Providing regular rubbish bins and no littering signage. Disrupting Breeding cycles There is the potential for this project to disrupt the breeding cycles of the species, primarily during the construction period (depending when this occurs). The breeding period for Southern Brown Bandicoot is from approximately July to January, with dispersal peaking in autumn (Van Dyck and Strahan 2008, DSEWPaC 2011a). Impacts to breeding cycles include: - Increased noise. - Potential for mortality from vehicles. - Increased fragmentation and predation. Mitigation measures to reduce impacts to breeding cycles include: - Construction will be limited to daylight hours. - Minimise use of heavy machinery and mitigate operating noise. - Maximum speed on construction tracks of 5 km/h to reduce the likelihood of accidentally hitting wildlife. - Spread cleared vegetation across cleared pathways at night during construction to improve connectivity and reduce potential predation. - Implement measures to reduce fragmentation, habitat loss and predation as outlined above and below. Increased invasive species The proposed works have the potential to increase the spread of invasive species, in particular predators (pest animals) and weeds that are likely to benefit from the disturbance corridors. Weeds may benefit from the disturbance due to the clearing of native vegetation opening areas up for

Species**Impact**

colonization and increased sunlight. Construction works and ongoing use may increase the likelihood of new weeds being introduced to the area. Weeds may reduce habitat suitability and quality. New paths and tracks may increase the incidence of pest animals which utilize pathways for movement (including cats, foxes, rabbits and introduced rodents). Pest animals may also be attracted to food waste left on site by contractors and visitors. The following measures will be implemented to avoid increasing invasive species: - Clean vehicles before they come on site to remove any seeds or other propagules. - Establish weed and fox control programs. - If rabbits are recorded on site, a control program should be implemented and any warrens encountered should be fumigated and collapsed. - Maintain strict waste management protocols to ensure that predatory and pest species are not attracted to the site. Introduce Disease There is a chance that diseases, primarily *Phytophthora cinnamomi*, could be introduced or spread as a result of the development. This would then impact habitat quality present on site. The potential introduction or spread of *Phytophthora cinnamomi* would be mitigated by: • Using *Phytophthora cinnamomi* hygiene protocols, and all equipment, vehicles and footwear should be washed down prior to coming on site. • Only certified *Phytophthora* free materials should be used in construction. Introduce Disease There is a chance that diseases, primarily *Phytophthora cinnamomi*, could be introduced or spread as a result of the development. This would then impact habitat quality present on site. The potential introduction or spread of *Phytophthora cinnamomi* would be mitigated by: - Using *Phytophthora cinnamomi* hygiene protocols, and all equipment, vehicles and footwear should be washed down prior to coming on site. - Only certified *Phytophthora* free materials should be used in construction. Direct mortality of individuals The proposed works may result in the direct mortality of threatened species, during vehicle movement or the removal of

Species	Impact
	<p>habitat. The following mitigation measures will reduce the likelihood of direct mortality: - Vehicle speed limited to walking pace (5km/h) on all tracks. - Vegetation cleared slowly and carefully to reduce likelihood of direct mortality. Decline in population size or area of occupancy. It is possible that the proposed works will reduce the local population size or area of occupancy of the three threatened species that inhabit or may inhabit the area. This may be due to any of the processes outlined above. The mitigation measures to reduce the likelihood of a reduction in the local population size or area of occupancy are also outlined above. Ongoing monitoring at the site and surrounding area will determine whether there has been a decline in the local population size or area of occupancy as a result of the project. Surveys will include Elliot trapping and remote cameras. A suggested outline of a monitoring program is as follows: - at least 10 cameras and two traplines with at least 20 Elliot traps per trapline in the 12 Apostles project area (i.e. within 250 m of existing or proposed infrastructure). - An additional two sites would also be surveyed within 3 km of the project area. Survey effort at these sites would include least 10 cameras and at least 20 Elliot traps. - Survey timing and effort would comply with DoEE survey guidelines for Southern Brown Bandicoot for cameras (DSEWPaC 2011a) and for threatened mammals for Elliot trapping (DSEWPaC 2011b). - Surveys would occur prior to construction commencing to establish a baseline to assess management actions against, and then occur annually thereafter for five years following construction of the proposed pathways and viewing platforms. If population or area of occupancy declines are observed that are likely to be as a result of the proposed works rather than other factors (e.g. prevailing conditions), management actions will need to be reviewed and improved.</p>
Swamp Antechinus	<p>Disrupting Breeding cycles There is the potential for this project to disrupt the breeding cycle of the species, primarily during the construction period (depending when this occurs). Impacts for Swamp Antechinus are</p>

Species	Impact
	similar to the impacts for Southern Brown Bandicoot The breeding period for Swamp Antechinus has been recorded between June and August, with dispersal increasing prior to breeding season (Van Dyck and Strahan 2008, Threatened Species Scientific Committee 2016a).
Broad-toothed Rat	Impacts for Broad-toothed Rat are similar to the impacts for Southern Brown Bandicoot The breeding period for Broad-toothed Rat has been recorded between October and March (Van Dyck and Strahan 2008, Threatened Species Scientific Committee 2016b). - Southern Brown Bandicoot – Breeding from approximately July to January, with dispersal peaking in autumn (Van Dyck and Strahan 2008, DSEWPaC 2011a).

2.4.2 Do you consider this impact to be significant?

No

2.5 Is the proposed action likely to have ANY direct or indirect impact on the members of any listed migratory species, or their habitat?

No

2.6 Is the proposed action to be undertaken in a marine environment (outside Commonwealth marine areas)?

No

2.7 Is the proposed action to be taken on or near Commonwealth land?

No

2.8 Is the proposed action taking place in the Great Barrier Reef Marine Park?

No

2.9 Is the proposed action likely to have ANY direct or indirect impact on a water resource related to coal/gas/mining?

No

2.10 Is the proposed action a nuclear action?

No

2.11 Is the proposed action to be taken by the Commonwealth agency?

No

2.12 Is the proposed action to be undertaken in a Commonwealth Heritage Place Overseas?

No

2.13 Is the proposed action likely to have ANY direct or indirect impact on any part of the environment in the Commonwealth marine area?

No

Section 3 - Description of the project area

Provide a description of the project area and the affected area, including information about the following features (where relevant to the project area and/or affected area, and to the extent not otherwise addressed in Section 2).

3.1 Describe the flora and fauna relevant to the project area.

In 2017, Ecology Australia conducted flora and fauna assessments of the priority sites for infrastructure for the Shipwreck Coast Master Plan. The comments below are based on the assessment report for the Twelve Apostles precinct.

No threatened flora was recorded in the Twelve Apostles precinct. The precinct is dominated by Coastal Tussock Grassland EVC, which has a bioregional conservation status of vulnerable. The vegetation presents as a grassland-shrubland mosaic, with a trajectory towards shrubland dominance. The area was last burnt in the early 1970s and it appears that shrubs, notably Manuka and Coast Beard-heath, have been actively recruiting into the grassland throughout the interfire period. The dominants of the former grasslands include Kangaroo Grass *Themeda triandra*, and Coast Tussockgrass, but there are also distinctive patches of Coast Saw-sedge.

Fauna surveys of the area recorded seven species on remote cameras, including one species of conservation significance (Rufous Bristlebird *Dasyornis broadbenti caryochrus* – FFG Act listed) and two exotic species (Red Fox *Vulpes vulpes* and Common Starling *Sturnus vulgaris*). A colony of approximately 120 Little Penguins *Eudyptula minor* is known to nest in the Bird Colony Shrubland at the base of the cliffs, outside the project area. A single Black-faced Cormorant *Phalacrocorax fuscescens* (classified as near threatened in Victoria by DSE 2013) was recorded on a rock stack opposite the Twelve Apostles Lookout.

One individual of conservation significance under the EPBC Act (Swamp Antechinus *Antechinus minimus*) was also recorded during targeted Elliot Trap fauna survey. Other species are considered likely to occur in the Coast Tussock Grassland/Shrubland Mosaic, within the Twelve Apostles precinct:

Southern Brown Bandicoot (confidence high);

White-footed Dunnart (confidence moderate);

Broad-toothed Rat (confidence moderate);

Rufous Bristlebird (confidence high);

Swamp Skink (confidence moderate); and

Tussock Skink (confidence rating moderate).

3.2 Describe the hydrology relevant to the project area (including water flows).

With the localised topography, there is a limited hydrological context other than during heavy rainfall events. It is likely that the majority of the surface flows in the area are directed towards the cliff edge or the drainage line just to the east of the project area which flows towards the cliff edge.

3.3 Describe the soil and vegetation characteristics relevant to the project area.

The following is based on the assessment results for the approved Cultural Heritage Management Plan (CHMP) 15179 (Bradley et al. 2018):

The project area is situated on a cliff/plateau of the Port Campbell Limestone geological formation, dating to the Miocene. This is a sedimentary (marine) formation typified by fine grained calcarenite, calcilutite, mollusc, echinoid and brachiopod fragments and deposits with minor coarse-grained quartz sands and clayey silts. These deposits are weakly cemented, moderately bedded continental shelf deposits.

The associated soil types include acidic mottled texture contrast soils (Kurosols), acidic gradational soils (Dermosols) and some sandy soils with high organic matter content (Podosols), with potential for shallow marine deposits. The soils within the project area are likely to produce quartz sand and clayey silts reflective of the Port Campbell limestone geology. Research during the Great Ocean Walk track realignments (Williamson 2009) suggests the depth of these soils vary from 300mm to 1000mm.

A test trench opened during the complex assessment phase of CHMP 15179 within the project area was excavated to a culturally sterile base clay at 230mm and consisted of two contexts: a fine to medium dark gray loamy clay, overlying a basal context of black medium to fine clay.

Vegetation characteristics of the project area are outlined above in Section 3.1.

3.4 Describe any outstanding natural features and/or any other important or unique values relevant to the project area.

The project site is situated on the Port Campbell limestone coast, in close proximity to the natural rock formations in the coastal waters of the Twelve Apostles. It is inside the Great Ocean Roads and Scenic Environs National Heritage place, which recognised as nationally significant for its cultural and natural values (See Section 2 for further details).

3.5 Describe the status of native vegetation relevant to the project area.

As per Section 3.1, no threatened native flora was recorded in surveys conducted by Ecology Australia (2017). The precinct is dominated by Coastal Tussock Grassland EVC, which has a bioregional conservation status of vulnerable.

3.6 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

Not applicable.

3.7 Describe the current condition of the environment relevant to the project area.

While dominated by Coastal Tussock Grassland EVC, there are small-scale variations in vegetation condition that are a result of weediness, or shrub dominance, with the latter reducing species and lifeform diversity. High threat weeds recorded include Buffalo Grass, Scotch Thistle *Cirsium vulgare* and Saffron Thistle *Carthamnus lanatus* (Ecology Australia 2017, 20).

3.8 Describe any Commonwealth Heritage Places or other places recognised as having heritage values relevant to the project area.

Nil

3.9 Describe any Indigenous heritage values relevant to the project area.

Indigenous heritage values assessed under the GOR National Heritage Listing suggest that while Aboriginal heritage places along the coastline are of regional significance in demonstrating occupation, resource use and settlement in Victoria, there is insufficient information to conclude that Indigenous values may meet the threshold for outstanding value to the nation.

A review of the Victorian Aboriginal Cultural Heritage Register shows that no Aboriginal cultural heritage has been recorded within the footprint of the proposed action. As part of a Cultural Heritage Management Plan developed under the Aboriginal Heritage Act 2006 (Vic), an area of archaeological potential was identified by Bradley et al. (2018, 95) along the drainage line to the east of the project area.

There are three Aboriginal Places listed in the Victorian Aboriginal Heritage Register in close proximity to the project area. These include:

Twelve Apostles 1 Aboriginal Place (VAHR 7520-01330-1) - located approximately 200m north of the Twelve Apostles and comprises an artefact scatter located on flat, coastal land. This Aboriginal Place has since been salvaged, prior to the construction of the Twelve Apostles Visitor Facilities. Gibsons Steps Aboriginal Place (VAHR 7520-0175-1 and VAHR 7520-0175-2)

– located approximately approximately 670m south-east of the Twelve Apostles, 100m from the coast, and comprises an artefact scatter and shell midden. VAHR 7520-0175-1 is a generally fragmented, low density shell midden on an eroding surface adjacent to a carpark and above the Gibson steps. Great Ocean Road Underpass Aboriginal Place (VAHR7520-0179) – located approximately 530m southeast of the Twelve Apostles. VAHR 7520-0179 is a complete quartz bipolar flake located on flat ground above high coastal cliffs, approximately 50m from the coast near the surface of a walking track.

Consultation with Eastern Maar Elders conducted as part of the development of the proposed action identified the importance of particular cockatoo species to Eastern Maar culture in the region of the proposed action. This cultural referent influenced the choice of colours and materials for the Proposed Saddle Lookout structure.

3.10 Describe the tenure of the action area (e.g. freehold, leasehold) relevant to the project area.

Crown land managed under the National Parks Act 1975 (Vic).

3.11 Describe any existing or any proposed uses relevant to the project area.

Parts of the project area are currently utilised by the trail and lookout infrastructure of Port Campbell National Park's Twelve Apostles precinct. This includes the existing pathway to and footprints of 'The Saddle Lookout' and 'Castle Rock Lookout'. The proposed uses within the project area will remain the same, however, the footprints of the activity will change with the removal of the current trail and lookout structures on the saddle and 'Castle Rock'.

Section 4 - Measures to avoid or reduce impacts

Provide a description of measures that will be implemented to avoid, reduce, manage or offset any relevant impacts of the action. Include, if appropriate, any relevant reports or technical advice relating to the feasibility and effectiveness of the proposed measures.

Examples of relevant measures to avoid or reduce impacts may include the timing of works, avoidance of important habitat, specific design measures, or adoption of specific work practices.

4.1 Describe the measures you will undertake to avoid or reduce impact from your proposed action.

Mitigation of potential impacts on National Heritage values

The response under this section considers direct measures incorporated into the design of the proposed viewing platform to avoid or reduce the impacts of the proposed action. It also describes the ways in which the Proposed Saddle Lookout itself represents a positive step in mitigation of those adverse heritage outcomes identified for some of the contributory views above.

Direct measures to reduce impacts

Any viewing facilities that replace the existing facilities will by their nature be visible from multiple locations. A viewing platform must achieve a level of elevation to afford visitors panoramic views. Given this circumstance, a decision has been made, in consultation with key stakeholders, to make the platform a creatively designed feature in the landscape rather than merely a dull, utilitarian element that excites no interest. This is consistent with world best practice and the master planning context for the region.

The Proposed Saddle Lookout would comprise human-made built form introduced into a natural landscape. In response to this:

Non-reflective materials are proposed for the Proposed Saddle Lookout to minimise the structure's visibility in different light conditions. The colour palette that would be used would be drawn from the local geology and inspired by Aboriginal culture. The colour of the structure would blend with the cliff faces that it overlooks. Minimal lighting would be employed to ensure that the dawn and dusk experience is not impacted.

Additionally, in a conscious effort to distinguish the naturally irregular lines of the local topography from the humanmade built form, the structure would employ crisp straight lines and angles (visible in long and closer views), together with angled metal fins (visible in closer views). The structure's location and design would invite viewers to appreciate the vast scale of the natural features by reference to the smaller humanmade structure sitting lightly adjacent to them. The starkness of its design also accords with the harsh environment in which it would be set. The Proposed Saddle Lookout represents a sensible and achievable balance between the

need for new viewing facilities (that will have a level of visual impact regardless of their form), and a desire to complement the aesthetic values of the Great Ocean Road through innovative and considered design.

The design was selected as the winning entry in a limited design competition, as part of the design services procurement, which included the Office of the Victorian Government Architect (OVGA) on the selection panel. It has been subject to ongoing development including evolution under the guidance of the OVGA and Victorian Design Review Panel.

In settling on the location of the Proposed Saddle Lookout, consideration was given to a range of options. An earlier iteration that placed the Proposed Saddle Lookout closer to the promontory at Castle Rock was modified to minimise the intrusion of the proposed built form into contributory views. Similarly, changes were made to the colour and materials of the proposed structure in response to public submissions made under the Shipwreck Coast Master Plan process.

Proposed Saddle Lookout as a step in the mitigation of broader adverse impacts

The Proposed Saddle Lookout itself represents a positive step in the mitigation of broader existing and anticipated threats to the National Heritage values of the Great Ocean Road and Scenic Environs, particularly those relating to criterion (e). These threats include the overcrowding and poor visitor access at the existing facilities resulting in a diminished experience of the place's aesthetic and social values.

The existing Twelve Apostles lookout areas comprise an intensively-visited tourist facility that has reached the end of its use life. The existing facilities are inadequate to the place's needs and make it difficult for the managers of the place to effectively transmit its heritage values to the Australian public and international visitors, which is a requirement of the National Heritage Management Principles under the EPBC Act. The removal of the existing facilities and their replacement with the Proposed Saddle Lookout would provide visitors with better views of critical vistas in a more pleasant and safer environment. In this regard, it is noted that the Proposed Saddle Lookout would accommodate approximate increases of 330% in visitor capacity and 165% in available viewing perimeter. This would be a positive heritage outcome.

An important design consideration which is relevant to the transmission of heritage values was the statutory requirement under the Disability Discrimination Act 1992 to provide for universal access and an 'equitable experience'. Whereas the existing saddle lookout presents significant accessibility issues for people using wheelchairs or with other mobility limitations, the Proposed Saddle Lookout has been designed to provide not only full accessibility but also equity of viewing experience for visitors of various ages and abilities. For example, design details include a combination of solid low-level balustrades, open full-height fins and glass balustrading in selected locations. Furthermore, equitable access considerations extended beyond physical ability to encompass the differing visitation preferences of people from different cultural backgrounds. This was an important consideration for a site that hosts visitors from many cultural backgrounds.

Another threat to the heritage values of the place includes the erosion of Castle Rock, both on a smaller scale, from visitor egress from existing facilities, and on a larger scale, from the natural weathering predicted to result eventually in the separation of Castle Rock from the mainland.

The scale, location and cantilevering of the Proposed Saddle Lookout incorporates geotechnical considerations to mitigate the effect of such future erosion, balancing the need to transmit heritage values to visitors with the need for robust and sustainable infrastructure that will alleviate known future risk.

Mitigation of potential impacts on listed species and threatened ecological communities

The key potential impacts relate to habitat loss, fragmentation and disruption to breeding, particularly of Swamp Antechinus.

The project addresses these impacts by:

minimising and strictly controlling the construction footprint, elevating portions of the proposed new pathway, and retrofitting a 10 m elevated section of the existing pathway; and

Postponing construction over the critical breeding period for Swamp Antechinus (i.e. June to the end of August).

4.2 For matters protected by the EPBC Act that may be affected by the proposed action, describe the proposed environmental outcomes to be achieved.

National Heritage values

The proposed environmental outcomes to be achieved by the proposed action in respect of the National Heritage values are a low to no impact to all gazetted values with the exception of values under criterion (e), and impacts to values under criterion (e) to be offset to the greatest degree possible by the improved visitor experience enabling better transmission of these values. Over time, it is anticipated the proposed action would result in a reduction to impacts on these values, and thus improved environmental outcomes on balance, as visitation and attendant pressures on both the environment and visitor experience increase.

Listed species and threatened ecological communities

In an intensively visited site, and the three listed ground-dwelling faunal species, the proposed works aim to limit visitors to a defined experience and infrastructure (minimise off track trampling), maintain connectivity through raised sections of walking track, and the construction program specifically planned to avoid disruption to breeding cycles and minimise disturbance.

Section 5 – Conclusion on the likelihood of significant impacts

A checkbox tick identifies each of the matters of National Environmental Significance you identified in section 2 of this application as likely to be a significant impact.

Review the matters you have identified below. If a matter ticked below has been incorrectly identified you will need to return to Section 2 to edit.

5.1.1 World Heritage Properties

No

5.1.2 National Heritage Places

No

5.1.3 Wetlands of International Importance (declared Ramsar Wetlands)

No

5.1.4 Listed threatened species or any threatened ecological community

No

5.1.5 Listed migratory species

No

5.1.6 Commonwealth marine environment

No

5.1.7 Protection of the environment from actions involving Commonwealth land

No

5.1.8 Great Barrier Reef Marine Park

No

5.1.9 A water resource, in relation to coal/gas/mining

No

5.1.10 Protection of the environment from nuclear actions

No

5.1.11 Protection of the environment from Commonwealth actions

No

5.1.12 Commonwealth Heritage places overseas

No

5.2 If no significant matters are identified, provide the key reasons why you think the proposed action is not likely to have a significant impact on a matter protected under the EPBC Act and therefore not a controlled action.

We believe this is not a controlled action.

Listed species and threatened ecological communities

The potential impacts to the three listed faunal species relate to habitat loss, fragmentation and disruption to breeding, particularly of Swamp Antechinus. The project addresses these impacts by minimising and strictly controlling the construction footprint; incorporating elevating portions of the proposed new pathway, and retrofitting a 10m elevated section of the existing pathway; and postponing construction over the critical breeding period. In the context of potential impacts and mitigation measures described the project is unlikely to result in significant impacts to the three listed species.

National Heritage values

The proposed Saddle Lookout is addressing current management challenges of overcrowding, infrastructure that is at the end of life and at risk from erosion, visitor safety and providing a contemporary experience at one of Australia's most internationally significant landscapes. The design of the proposed works has been informed by community consultation, functional analysis (such as geotechnical performance) and feedback from Traditional Owners in how best to integrate the facility in a culturally significant landscape.

Key considerations in mitigating any impacts have been the visual and cultural heritage characteristics, particularly the form and colour, and the consequent appearance from key viewpoints, both to and from the structure.

The impacts in the landscape are well understood and modelled, and have been subject to contemporary design to minimise negative visual impacts, but provide facilities that enable visitors to access and understand the values of the landscape.

Key elements relating to the visual impact of the proposed lookout include:

Colour

The development of the design has been visually integrated in to the cliff through refined cladding treatment and colour selection. It has adopted muted earth tones when viewed from

sensitive locations, supported by limited accent colour from selected viewpoints on the lookouts.

The design incorporates a nuanced use of colour on the south lookout (the dark lookout) to respond to key viewpoints. The dark stick is the most prominent element of the lookout in the broader context but is viewed from a typically distant perspective. In contrast, the North lookout (the light lookout) is predominantly viewed by visitors already within the tourist precinct.

The colour response for the South lookout includes adding natural colour tones from the landscape, plus rotating the fins to vary the external reading depending upon the viewpoint. The effect sympathetically relates the skin to the cliff rock tones when viewed from sensitive viewpoints.

The four tones range from dark brown through reddish browns to a muted red-ochre. All of the tones have been selected from sampling the colours within the cliff-face geology. Similarly, the variation and vertical stratification echoes that of the cliff-face.

The tones have also been selected in consultation with a local Traditional Owner artist, to reflect the feathers of the black and white cockatoos, which are totemic species of the traditional moiety system of the local Aboriginal community. The light toned North lookout represents the white cockatoo with the tail-feather pale yellow in a location marking the entry and exit points to the lookout.

Splayed Fins

The fins forming the dark stick balustrade and cladding, are splayed in plan from +45 degrees through perpendicular to the deck to -45 degrees. The most distinctive red-ochre tone is restricted to those fins generally perpendicular to the deck and therefore predominantly edge-on when viewed externally. This red-ochre tone is on only 10% of the fins. The red-ochre provides a subtle highlight to the visitor on the lookout when viewed up close but is practically recessive from a distance.

The darker, more muted tones are applied to the remaining fins (and the base stick cladding). Therefore, the appearance of the lookout from views on Gibson Steps beach and along the Great Ocean Road are recessive and respectful to the landscape and geology of this place.

Views

From the photomontage modelling prepared by Hansen Partnership[HW2] [LCJ3] (and reproduced in Part 4.3.2 of the attached Extent Heritage report), the impact of views to the Proposed Saddle lookout from outside the precinct range from nil to high and limited to discrete locations. The views from the lookout would be a significant improvement on those from the existing viewing facilities, responsive to the large visitor numbers and the need to improve the overall visitor experience at the destination views to the Apostles and cliffs. The lookout maintains uninterrupted views to the Apostles for all users including children and those in wheelchairs.

The proposal removes visitors from the Castle Rock promontory. Currently, the existing timber lookouts and their approach paths are populated with large crowds, degrading views to Castle Rock from all directions. The new lookout proposal delivers an elevated panoramic outlook for

visitors but does not physically allow them to intrude upon the promontory which will also improve visitor safety. The existing lookout and paths are to be removed and remediated.

Consistent with the desires of the Traditional Owners and others, the lookout would be a dark site at night. It would not include any feature lighting and would allow the night sky and darkness to dominate.

In conclusion, the proposed design represents a considered and sophisticated response to the identified potential adverse heritage impacts while permitting the construction of a new, functional lookout. Through a comprehensive and consultative design process potential adverse visual impacts have been substantially mitigated, and both the safety and visitor experience at an iconic heritage place markedly improved in response to sustained visitor growth.

Section 6 – Environmental record of the person proposing to take the action

Provide details of any proceedings under Commonwealth, State or Territory law against the person proposing to take the action that pertain to the protection of the environment or the conservation and sustainable use of natural resources.

6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Please explain in further detail.

Yes.

Parks Victoria is a statutory authority that is responsible for managing an expanding and diverse estate covering more than 4 million hectares throughout the state of Victoria. Parks Victoria has a very good track record of responsible environmental and cultural management. Parks Victoria is responsible for protecting and improving the overall health of ecosystems, ecological communities and species across the natural places entrusted to its management, and protecting, preserving and relaying cultural heritage values to the community.

6.2 Provide details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against either (a) the person proposing to take the action or, (b) if a permit has been applied for in relation to the action – the person making the application.

There are no past or present proceedings against Parks Victoria that would meet this criteria.

6.3 If it is a corporation undertaking the action will the action be taken in accordance with the corporation's environmental policy and framework?

Yes

6.3.1 If the person taking the action is a corporation, please provide details of the corporation's environmental policy and planning framework.

Parks Victoria abides by State and Commonwealth statutes and laws. As a statutory authority responsible for protected area management, all activities are governed by a comprehensive suite of organisational policy, procedures, and delegations to ensure compliance with the relevant Acts, such as the National Parks Act 1975.

A copy of the Parks Victoria's Park Management Policy and Parks Victoria's 2019-2022 Corporate Plan are attached.

6.4 Has the person taking the action previously referred an action under the EPBC Act, or been responsible for undertaking an action referred under the EPBC Act?

Yes

6.4.1 EPBC Act No and/or Name of Proposal.

2017/8080 - PARKS VICTORIA/Tourism and Recreation/Multiple lots within Property No 2232794/Victoria/Grampians Peaks Trail, Vic

2013/7099 - Parks Victoria/Tourism and recreation/Mount Buffalo Road, Mount Buffalo/VIC/Mount Buffalo Chalet Redevelopment, Mount Buffalo, Vic

2013/6930 - Parks Victoria/Tourism and Recreation/Plenty Gorge Parklands, South Morang/Victoria/Plenty River Trail multi purpose pedestrian/bicycle trail Stage 6 and part of Stage 7, V

2012/6325 - Parks Victoria/Natural resources management/Bairnsdale, 280km east of Melbourne /VIC/Macleod Morass Over-Abundant Vegetation Management

2012/6247 - Parks Victoria/Tourism and Recreation/Berwick, 40km south east of Melbourne/Victoria/Cardinia Creek (North) Parklands Master Plan, Stage 1

2010/5437 - Parks Victoria/Tourism and recreation/Staceys Road, Lake Connewarre State Game Reserve/VIC/Barwon River Parkland Initiative, Tait's Point, Stages 1 and 2

2010/5312 - Parks Victoria/Tourism and recreation/Merri Creek Valley, Campbellfield, Melbourne/VIC/Galada Tamboore Parklands Infrastructure and Formed Trail Construction

2010/5294 - Parks Victoria/Tourism and recreation/Toolern Creek from Bridge Road to Greigs Road, South Melton/VIC/Toolern Creek Park Development

2009/5246 - Parks Victoria/Natural Resources Management/Werribee/Victoria/The Development of Werribee River Regional Park

2008/4331 - Parks Victoria/Tourism and Recreation/Flinders Pier, Flinders near West Head, Vic/Victoria/Upgrade and Repairs to Flinders Pier

2008/4112 - Parks Victoria/Tourism and Recreation/Rocky Valley Storage, Bogong High Plains, Alpine NP/Victoria/Construct multi-use walking trac

2008/4023 - Parks Victoria/Natural resources management/Point Cook Homestead Rd, 20km SW of Melbourne/VIC/Point Cook Coastal Park Bay Trail Construction (Stage 3, nth part)

2004/1352 - Parks Victoria/Water transport/Queenscliff/VIC/Queenscliff Harbour Redevelopment

2002/793 - Parks Victoria/Tourism, recreation and conservation management/Otway and Port Campbell NP/VIC/Track construction - Great Ocean Walk

2002/593 - PARKS VICTORIA CITY BAYS REGION/Tourism and Recreation/Point Cooke Coastal Park Laverton/Victoria/Point Cooke recreational trail Stage 2

2001/324 - Parks Victoria/Tourism and Recreational Facilities/Point Cooke Coastal Park, Laverton/VIC/Point Cooke Coastal Trail

Section 7 – Information sources

You are required to provide the references used in preparing the referral including the reliability of the source.

7.1 List references used in preparing the referral (please provide the reference source reliability and any uncertainties of source).

Reference Source	Reliability	Uncertainties
Twelve Apostles Saddle Lookout: Assessment of Impact on National Heritage Values, Extent Heritage, 2019.	High – advisors engaged in thorough assessment incorporating extensive visual impact analysis	None known
Approved Cultural Heritage Management Plan 15179 (Bradley et al. 2018):	High – has been approved under the Aboriginal Heritage Act 2006 (Vic); incorporated subsurface testing.	None known.
Shipwreck Coast Master Plan Priority Sites for Infrastructure: Flora and Fauna Assessment (Ecology Australia 2017)	High - advisors engaged in thorough assessment incorporating seasonal targeted surveys	None known

Section 8 – Proposed alternatives

You are required to complete this section if you have any feasible alternatives to taking the proposed action (including not taking the action) that were considered but not proposed.

8.0 Provide a description of the feasible alternative?

Not applicable

8.1 Select the relevant alternatives related to your proposed action.

8.27 Do you have another alternative?

No

Section 9 – Contacts, signatures and declarations

Where applicable, you must provide the contact details of each of the following entities: Person Proposing the Action; Proposed Designated Proponent and; Person Preparing the Referral. You will also be required to provide signed declarations from each of the identified entities.

9.0 Is the person proposing to take the action an Organisation or an Individual?

Organisation

9.2 Organisation

9.2.1 Job Title

Director Park Planning and Pol

9.2.2 First Name

Stuart

9.2.3 Last Name

Hughes

9.2.4 E-mail

stuart.hughes@parks.vic.gov.au

9.2.5 Postal Address

Level 10

535 Bourke Street
MELBOURNE VIC 3000
Australia

9.2.6 ABN/ACN

ABN

95337637697 - PARKS VICTORIA

9.2.7 Organisation Telephone

(03) 13 1963

9.2.8 Organisation E-mail

info@parks.vic.gov.au

9.2.9 I qualify for exemption from fees under section 520(4C)(e)(v) of the EPBC Act because I am:

Not applicable

Small Business Declaration

I have read the Department of the Environment and Energy's guidance in the online form concerning the definition of a small a business entity and confirm that I qualify for a small business exemption.

Signature:..... Date:

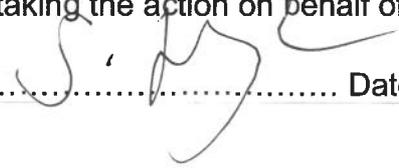
9.2.9.2 I would like to apply for a waiver of full or partial fees under Schedule 1, 5.21A of the EPBC Regulations

No

9.2.9.3 Under sub regulation 5.21A(5), you must include information about the applicant (if not you) the grounds on which the waiver is sought and the reasons why it should be made

Person proposing the action - Declaration

I, STUART HUGHES, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf of or for the benefit of any other person or entity.

Signature:.....  Date: 29/10/2019

I, _____, the person proposing the action, consent to the designation of _____ as the proponent of the purposes of the action describe in this EPBC Act Referral.

Signature:..... Date:

9.3 Is the Proposed Designated Proponent an Organisation or Individual?

Organisation

9.5 Organisation

9.5.1 Job Title

Director Park Planning & Policy

9.5.2 First Name

Stuart

9.5.3 Last Name

Hughes

9.5.4 E-mail

stuart.hughes@parks.vic.gov.au

9.5.5 Postal Address

Level 10

535 Bourke Street
MELBOURNE VIC 3000
Australia

9.5.6 ABN/ACN

ABN

95337637697 - PARKS VICTORIA

9.5.7 Organisation Telephone

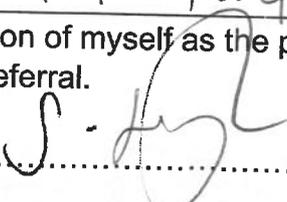
(03) 13 1963

9.5.8 Organisation E-mail

info@parks.vic.gov.au

Proposed designated proponent - Declaration

I, STUART HUGHES, the proposed designated proponent, consent to the designation of myself as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:  Date: 29/10/2019

9.6 Is the Referring Party an Organisation or Individual?

Organisation

9.8 Organisation

9.8.1 Job Title

Director Park Planning and Policy

9.8.2 First Name

Stuart

9.8.3 Last Name

Hughes

9.8.4 E-mail

stuart.hughes@parks.vic.gov.au

9.8.5 Postal Address

Level 10

535 Bourke Street
MELBOURNE VIC 3000
Australia

9.8.6 ABN/ACN

ABN

95337637697 - PARKS VICTORIA

9.8.7 Organisation Telephone

(03) 13 1963

9.8.8 Organisation E-mail

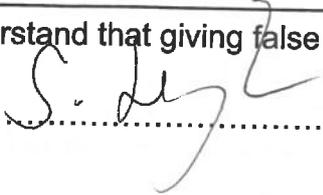
info@parks.vic.gov.au

Referring Party - Declaration

I, STUART HUGHES, I declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and

correct. I understand that giving false or misleading information is a serious offence.

Signature:.....

A handwritten signature in black ink, appearing to be 'S. Dyer', written over the signature line.

Date:.....

29/10/2019

Appendix A - Attachments

The following attachments have been supplied with this EPBC Act Referral:

1. 1-07-05-2019-018_12 Apostles_viewing platform.pdf
2. Endorsed Plans Planning Permit PP2018 112 201871P.PDF
3. MC Act consent letter_Twelve Apostles_Shipwreck Coast_SP465714.pdf
4. Park management policy.pdf
5. Parks Victoria Corporate Plan 2019-22.pdf
6. Planning Permit Parks Victoria PP2018 112 201871P.PDF
7. SWCStageOne_Engagement_Summary_Report_JULY_2018.pdf
8. SaddleLookout_20190416_Design Clarifications_Comp_Part_1.pdf
9. SaddleLookout_20190416_Design Clarifications_Comp_Part_2C.pdf
10. SaddleLookout_DesignApproach.pdf
11. Shipwreck Coast EPBC Letter_191017.pdf
12. Shipwreck Coast Infrastructure Flora and Fauna Assessment_Comp.pdf
13. Shipwreck Coast Infrastructure Flora and Fauna Assessment_Comp2.pdf
14. Shipwreck Coast Targeted Surveys Client Draft 6 April 2018.pdf
15. Shipwreck Coast Targeted Surveys Client Draft 6 April 2018_2.pdf
16. Twelve Apostles Saddle Lookout_HeritageAssessment_final-20191023.pdf