

## Controlled action summary information

Reference – 2019/8571, Twelve Apostles Saddle Lookout

Applicant – Parks Victoria

Submitted by: Stuart Hughes, Director Park Planning and Policy

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This report is to provide a summary of information relevant to the 'controlled action' stage under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and the *Environment Protection and Biodiversity Conservation Regulations 2000* (EPBC Regulations).

This matter was referred to the Department of Agriculture, Water and the Environment (the Department), and through exhibition the community was invited to provide comment from 11 December 2019. No submissions were received during the exhibition period.

The matter is now considered by the Department as a controlled action. Through the exhibition of this report along with other materials, and the information exhibited at the referral stage, the community is invited to comment on the proposed action. This report summarises:

- Identifying the benefits of the proposed action, in particular the partnership with, and identity of, the Traditional Owners of the Country that includes the Saddle Lookout, the Eastern Maar people.
- The design considerations and options that have been considered and discounted at the planning stage, as important context to the strength of the functional and design response process.
- Variations since the exhibition of the referral. Specifically, this report:
  - Clarifies that the areas currently featuring the saddle and Castle Rock viewing points will be rehabilitated with endemic vegetation.
  - Extends the areas of plantings under the cantilevered section of the new structure and along the edges of the structure.
  - A change to the landward end of the northern 'clapstick' in modifying the right-angle end of the walls to being angular, to reduce the visual impact of the built form in the landscape.
  - Improved accuracy of the graphic representation of the structure, indicating a lower vertical elevation of the northern clapstick walls.
  - A change to the finish of the handrail and supporting stems from polished to brushed stainless steel.

The colours of the structure as illustrated in the referral is strongly supported by Parks Victoria and the Eastern Maar Aboriginal Corporation and is to be maintained.

With these further variations, the project is only strengthened to address the functional needs while mitigating any significant impact to the visual environment. This further reinforces Parks Victoria's position that the enhanced Saddle Lookout is an appropriate response to the current offer and issues at the site, and that it protects the recognised values and does not constitute a significant impact to those values.

This summary report should be read in conjunction with the materials exhibited at the referral stage that provide key information on matters such as:

- Detailed descriptions of the proposed works.
- The alignment of the proposed works with existing strategic plans and other regulatory requirements.
- Community engagement in the design process.
- Risk mitigation measures applied.

## Social and economic benefits

The Great Ocean Road is an internationally significant destination for nature based tourism, with the Twelve Apostles the most popular location. In excess of 15,000 people visited the Twelve Apostles on Christmas Day 2019, the highest daily number recorded by Parks Victoria. Prior to COVID-19, the demand was consistently increasing, with the outdated infrastructure not providing a safe and quality visitor experience.

Viewing the Twelve Apostles is a key attractor to a visit to Victoria. The National Heritage List citation duly recognises lookouts at the Twelve Apostles provided the community the opportunity to appreciate the significant aesthetics. The Saddle Lookout is the most visited lookout at the Twelve Apostles, and the only land site for visitors to view all of the limestone stacks. As such the experience at the Saddle Lookout is a critical component to the journeys of millions of visitors.

The updated Saddle Lookout is the culmination of years of collaborative planning between Parks Victoria and the Eastern Maar Aboriginal Corporation. This collaborative planning has had regard of matters such as safety, experiential and capacity issues of the existing facilities, and importantly to provide a means for Eastern Maar's identity in the landscape to be integrated.

Inextricably, the "Great Ocean Road and Scenic Environs" National Heritage List citation does not include the significance of aboriginal, or Eastern Maar, values within the citation. Up until the referral stage, the Department has been unable to consider the tremendous benefits that the expression of the Eastern Maar people in the future of their Country can have to them and people that visit Country through this project. The **attached letter from Parks Victoria** strongly outlines the value of the partnership with the Eastern Maar people, highlights the injustice and cultural harm caused to Eastern Maar people, and the opportunity that the progression of the project can have to celebrate a contemporary approach to inclusion of social and cultural values and expression of Aboriginal culture and rights.

The colour palette for the structure, chosen by Eastern Maar as a representation of the totemic cockatoos, is a crucial part of the design and people's identity. These colours are important, and to date the Department's evaluation process has considered them impactful to the historic heritage values. Specifically, Parks Victoria continues to only see benefit from the colour palette and what it represents.

The changes at Saddle Lookout are the part of the first stage of works in implementing the *Shipwreck Coast Master Plan 2015* (the master plan).

Along with many other outcomes, the master plan seeks to remove outdated or unsafe infrastructure, apply enhanced people and traffic movement that priorities walking and public transport, and overall seeks that visitors stay longer and spend more in the precinct and surrounding areas.

The enhancement of the Saddle Lookout is an essential component to the implementation the master plan, with committed investment of the Australian and Victorian governments to further works.

While supporting a more resilient regional community, the implementation of the master plan provides direct economic benefits from income flowing into the regional economy, the consequential 'multiplier effect', and wider economic benefits from enhanced productivity. The social benefits including recreational, leisure, health and educational benefits to visitors from an enhanced visitor experience.

The master plan describes and quantifies the economic benefit that would be realised through it's implementation, to key attributes such as the spend by visitors in the region. These are important considerations, but this report is seeking to overtly highlight that the enhancement of the Saddle Lookout will deliver two fundamental benefits, compatible with the recognised values, of:

1. Ensuring the visitor's journey to the Great Ocean Road and Twelve Apostles is adequately served through the most visited lookout being safe, able to cater for visitor demand, and removes barriers through universal design.
2. A greater expression of Eastern Maar identity and how this supports their rights, and the benefits to visitors through a greater opportunity to connect with their identity.

## Design context and details of the proposed variations to the action

The design of the proposed viewing structure has been predominantly informed by functional constraints or functional needs. The following 5 functional elements have resulted in the form of the structure.

### 1. Sole location in the precinct for viewing all apostles

- The existing lookout at the Castle Rock promontory, featuring the viewing points in the saddle, and then at the Castle Rock high point, is the only location in the broader Twelve Apostles precinct that people can view all the stacks. As it is an existing location, and there are no other prospective locations, the design process has been to design a structure at this location.



*The Castle Rock promontory is the sole location in the precinct to view all stacks*

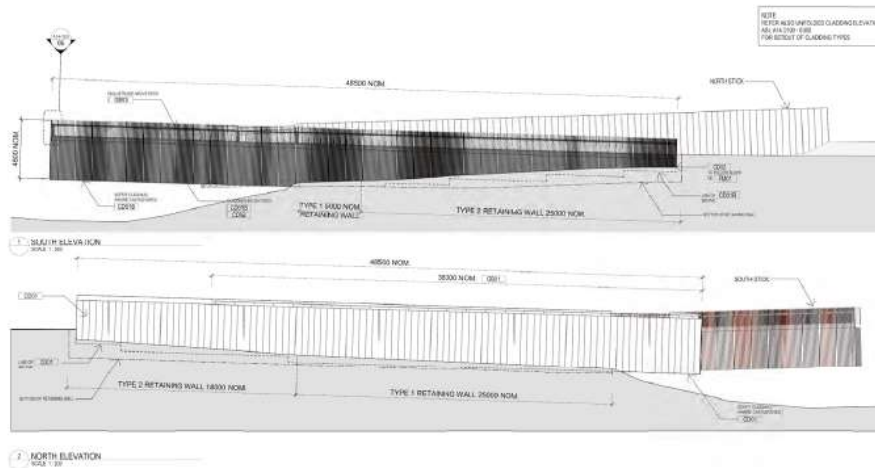
### 2. Horizontal axis / plane

- A core design consideration was to have the lookout horizontal. The existing 'saddle' topography has grades that mean an on-ground facility could not be DDA compliant, or meeting the aspiration of Parks Victoria of removing barriers for all people through universal design. Given the localized topography, the options were to have a structure essentially extending from the flat plateau to the vantage point where people could see stacks in both directions, or a structure that was elevated and more landward to rise above the vegetation. A structure rising vertically above the surrounding area was discounted on numerous grounds, including visually, and the functional response was keeping the structure at the plateau 'plane'.



### 3. Geotechnical analysis

- Initial consideration was given to the extent of the structure 'outwards', or seaward, along the promontory, and at a horizontal plane. Options were to span the saddle to the high point of the promontory where the Castle Rock viewing area is located, or a cantilevered structure. Spanning the saddle was discounted due to geotechnical hazard analysis and the risk of failure along the promontory, as well as the significant visual impact of a structure that length. The only option on geotechnical grounds was to have a structure anchored at the plateau.
- A simple structure of a rectangular structural form was adopted.



*Cross section of the structure benched into the plateau topography*

### 4. Size modelled on visitor demand

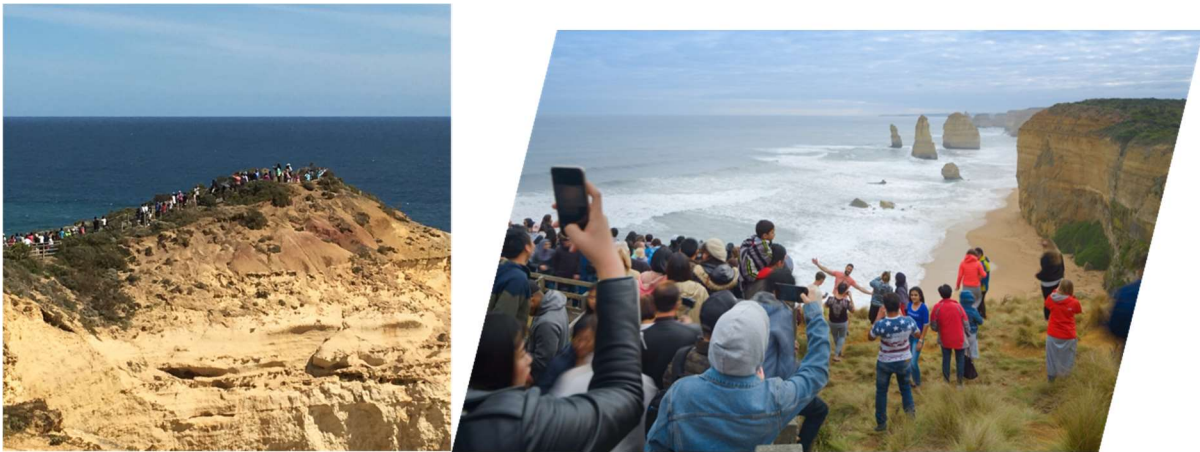
- The functional design of the structure is essentially a combination of the outward extent to achieve the vistas of all stacks, and a sized viewing area to meet current visitor demand. The referral demonstrates the reduction of its length during the design process. For the viewing area required, pedestrian modelling based on the 'Fruin Level of Service' of 25 pedestrians / metre / minute was adopted, together with the available lengths along the structure. The modelling for the size and shape of the structure equates to a capacity of 1900 visitors per hour, which is 15% greater than the visitor surveys of March 2017. Importantly, the visitation at the site has increased in the period 2016-2019 by 22% daily and 42% for the peak days; Parks Victoria has not sought to increase the size of the structure to meet current substantial demand.
- The localised topography and vegetation also has the views of all stacks not being available until a distance out from the plateau.



*The closest left-right vista is not possible from the plateau but evident from where people are assembling down the slope*

## 5. Visitor safety

- The existing Saddle Lookout is the most visited of all viewing areas at the 12 Apostles precinct. In response to visitors breaching the designated area, Parks Victoria has for years strengthened the fencing / balustrading. This has demonstrably impacted the viewing experience, in particular for small children and people in wheelchairs. Breaches continue to occur.
- The functional design of the structure has attributes of:
  - Having visitors away from the cliff edges
  - The cantilever means people may be less likely to jump over the edge of the structure as it is metres down to the surrounding ground
  - The existing Castle Rock area will be rehabilitated, aimed at removing a desirable location
  - Having strong built form at the landward ends of the structure is aimed at visitors not seeking to climb over the structure anywhere along its length



*The design aims to remove visitors from the cliff edges and avoid breaches over the barriers*

These five elements have cumulatively dictated the form of the designed structure, with minimal scope for further variation. This information is provided as crucial context to deem the form of the structure does not have a significant impact to maintaining a viewing experience at the Saddle lookout location.

## 6. Aesthetics of the structure when viewed from nearby locations

There are a range of design elements that have led to the aesthetics of the structure as documented in the exhibited referral. The impact of the structure is deemed to be when viewed from locations away from but proximate to the structure, not the aesthetics from within the structure.

These aesthetic considerations include:

- i. Colour palette
- ii. Balustrading / cladding / handrailing
- iii. Shape & lighting
- iv. Surrounding vegetation

### Colour palette

- The exhibited referral outlines the changes to the colour scheme throughout the design process. In summary, the early scheme was contrasting black and white ‘clapsticks’. Then through commissioning of an Eastern Maar community member and designer, the colours were modified to be representative of the totemic cockatoos, with tones close to the cliffs. This is comprehensively outlined in the exhibited referral.
- The early designs also included continuous cladding for the southern clapstick that extends seawards from the adjacent northern clapstick. To minimise the visual impact of the solid cladding in the outermost section, and importantly to allow for superior viewing at the optimal viewing area, the use of full height balustrades was adopted. To vary the visual plane, these are rotated at varying angles. These rotating balustrades allow for colour variability at an individual balustrade level, as well as light permeating above the deck.

### Balustrading / cladding / handrailing

- The exhibited referral documentation outlines the cladding and balustrading design considerations, such as visitor safety and views. Further design considerations have included weight, reflectivity, and lifecycle maintenance.
- The cladding is lightweight in material, being anodized aluminium. Materials such as glass, steel and timber were discounted due to factors such as weight, resilience in the coastal environment, and how the material (and its colour) sat visually in the landscape. The lightweight aluminium was superior, and visually, the lightweight aluminium allows for the cladding to be of the determined colour, as outlined earlier.
- The northern clapstick includes a handrail at 1.3 m high from the deck, and in the exhibited referral is specified as polished stainless steel. To minimize the reflectivity and be of a more neutral appearance, a **variation** is that the handrail and supporting stems be brushed stainless steel.

### Shape and lighting

- The shape of the structure is primarily based on structural performance. The shape is essentially two rectangles, and with the cantilever, represents the ideal shape for structural performance and limiting the bulk of the structure. Changes to the horizontal shape of the structure, away from the simple rectangles, would increase the structural complexity. The superstructure is hidden behind the cladding or balustrades.
- Each clapstick is purposefully angled away from horizontal;
  - the southern clapstick extends upwards away from the land, but to avoid the seaward height, starts at a lower height landward;
  - the shorter northern clapstick, angles upwards towards the land. This does result in a slightly higher vertical height of the landward end. To reduce the visual impact of the end of the clapstick, the previous right-angled end of the walls has had a **variation** to an angular end.
  - A **variation** is included where the graphic representation of the side section of the structure had been inaccurately developed at the referral stage. The error was that the northern clapstick was shown to be of greater elevation. This error has been corrected, which provides a more accurate representation of how the structure sits in the landscape around the native vegetation.



*The **variations** to the accuracy of the elevation of the walls, and changed landward end of the walls on the northern clapstick, and the greater extent of vegetation at the end of the northern clapstick*

- The northern clapstick is slightly angled in cross-section to allow for enhanced viewing above the cladding, for people in wheelchairs or small children; this has an additional benefit of having the northern cladding angled slightly downwards, lessening the reflectivity of this plane.
- Throughout stakeholder engagement, there was strong representation to have roofed or covered sections to provide a greater all-weather experience on the structure. This was considered to have a visual impact when viewed from nearby locations; create potential risk the glass or other materials would limit the quality of the viewsheds, including as the glass becomes impacted over time; and detract from the immersiveness of being 'out' in the landscape. This element was discounted.
- Also, during engagement, there was interest to have feature lighting on the structure at nighttime. This was discounted as it is not a functional outcome and the views of the Eastern Maar community was it would detract from ideal viewing of the dark sky.



### Surrounding vegetation

- The removal of the existing lookout structures and associated access paths will necessitate the rehabilitation and revegetation of these areas. This will feature endemic species of the localised ecological vegetation community. Aesthetically this will carry the existing colours, type and structure of the important natural landscape and may assist with weathering of the top of the promontory.
- Specifically, this further information is a **variation** to the referral in illustrating that the revegetation will be included under the cantilevered section of the structure, to minimise the extent the structure is above the natural landscape. Furthermore, areas directly surrounding the structure will be revegetated, which will limit the extent the structure sits above the surrounding vegetation and reduce potential desire areas for people to climb over or walk around the structure. A **variation** to the referral is the vegetation will extend beyond the structure, into the path area, to reduce the visual impact of the built form.
- A **variation** to the referral is showing an illustration of the rehabilitation of the existing lookout and path.



*The variations to the greater extent of vegetation under the structure, and seaward rehabilitating the areas of removed infrastructure*

### Summary of variations to the exhibited detailed design

1. Amends the detail of the handrail on the northern structure from polished stainless steel to brushed stainless steel.
2. Amends the graphic representation of the side section of the structure (wall elevation) that had been inaccurately developed at the referral stage.
3. Amends the design of extent of vegetation that will extend beyond the structure, into the path area.
4. Amends the graphic representation in illustrating that the revegetation will be included under the cantilevered section of the structure and illustrating the area where the removed infrastructure will be rehabilitated.

All variations seek to enhance the design and how this sits in the landscape. Cumulatively these changes significantly contribute to a reduction in any perceived impact to values. All variations are limited to matters of national environmental significance (MNES) that were relevant to the referral exhibited and do not introduce new matters.

All changes do not impact the functionality, capacity or integrity of the facility.

In the absence of any public submission to the exhibited referral, the changes are not based on community concern or similar.

The design of the structure has been a collaborative and inclusive process involving Parks Victoria and the Eastern Maar Aboriginal Corporation, with expert advice from partners such as the Victorian Government Architect. The protection and celebration of Eastern Maar values, people and their aspirations has been foundational to the design process and the features of the design reached. Parks Victoria and Eastern Maar do not seek any further variation to the design.