



Cassy O'Connor MP

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Dr John Whittington  
Director of National Parks and Wildlife  
[representations@parks.tas.gov.au](mailto:representations@parks.tas.gov.au)

Dear Dr Whittington

### **Tasmanian Greens Representation: Freycinet National Park Draft Management Plan 2015**

The Tasmanian Greens are strongly opposed to amendments to the Freycinet National Park Management Plan to enable increased private development infrastructure inside the boundary of the Park. The current Management Plan explicitly prohibits any further expansion of the Freycinet Lodge in to the National Park.

We note changes proposed by the Draft Management Plan would allow for the expansion of the Freycinet Lodge lease as well as allow additional built accommodation inside the Coles Bay Visitor Zone. Both of which are prohibited by the current Management Plan.

We believe the current Expressions of Interest process is deeply flawed and highly political, with favoured private developers receiving exclusive, government-enabled access to Tasmania's public protected areas. We regard this as an abuse of proper process.

We note that the consultation document was released on the eve of Christmas and the holiday period, a well travelled path for governments who want to avoid rigorous scrutiny of poor or contentious public policy.

It is a very sad day when the protection of natural and cultural values in Tasmania's world class National Parks and the TWWHA apparently takes a distant second place to the interests of private developers.

As it currently stands the only justification for these changes that has been provided with the consultation document is that the Tasmanian tourism industry is undergoing a period of growth. Not only is this dismissive of the potential for appropriate private tourism development in rural and regional centres outside the boundaries of protected areas, it is also indicative of a lack of vision for maintaining what is unique about Tasmania's reserve

system – its naturalness and the fact that it is largely unspoiled by tourism development and other built infrastructure.

A wide range of other directly relevant information is absent from the ‘consultation’ document, as outlined further below.

The absence of this relevant information makes informed community input into the Draft Management Plan not possible.

There are a number of problems with these two proposals and/or missing pieces of important information:

1. There is no map accompanying the consultation document released by the Parks and Wildlife Service which sets out the practical, on the ground effect of the changes.
  2. A map and graphic does exist of the proposal from the current operators of Freycinet Lodge however it sits on the website for the Coordinator General which may not be known by people interested in making a submission. When the Coordinator General graphic and map is located, it appears to possibly misrepresent the proposal. The graphic marks out 12 new cabins and six new motor home sites, however the proposal is described elsewhere as being for 24 new cabins and 12 motor home sites. Also, the the map makes it appear that the proposed extension is smaller than the area of the existing lease, when it is not. The existing area of the lease (according to the existing management plan is 4.53 hectares) and the proposed extension is larger at 5.6 hectares.
  3. The current Management Plan for Freycinet National Park is six years overdue for review but instead of initiating a comprehensive review process to update the Plan, piecemeal amendments are being made to facilitate a specific proposal. A comprehensive review is necessary before any change is made. The management plan states “Review the plan ten years after its approval, or sooner if circumstances show this to be needed”.
  4. The current Plan states, “There will be no extension to the area of land leased by Freycinet Lodge and no further cabin development beyond the existing capacity”. Presumably this was based on sound rationale at the time and was intended to guard against certain risks. These risks need to be publicly identified prior to consultation on the removal of the prohibition.
  5. The information provided for public comment makes no attempt to identify specific park values that will be impacted by the extended lease site. For example, has a survey been undertaken of Aboriginal cultural heritage within 5.6 hectare extension?
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6. Clarification is needed over the precise proposal being consulted upon. There is reference to the extra 5.6 hectares being required to house 12 cabins and 12 powered sites for motor homes. However there are also references to a further 12 cabins possibly being considered 'at a future date under a second stage'. This raises uncertainty about precisely what is being consulted upon. Is it 12 cabins or 24?
7. Information on how much vegetation will need to be cleared would assist in achieving informed public consultation, as would information on:
  - (a) impacts on views of the National Park from the Coles Bay town, Coles Bay water and from atop the Hazards and other elevated points inside the National Park
  - (b) impact that 12 (or 24) additional cabins and 12 powered sites and ensuite facilities for motor homes will have on water resources
  - (c) How much sewage will the development create, how will this be dealt with and what impact, if any, will this have on other users of the area and the environment?
  - (d) Is the National Park oversubscribed for visitors currently? How many people visit the Park at present and what risks are created by allowing for increased numbers of visitors staying overnight inside the park and embarking on activities during their stay? How will those risks be managed?
  - (e) What new road works will be required to facilitate the expanded lease area and the increased vehicle movements inside the fragile coastal zone?
  - (f) What fire protection regime will need to be put in place to provide safety to the expanded lease site?

Along with these specific pieces of information that are missing in this flawed process, there is also an obvious need for far better consultation to occur, rather than the minimum required by legislation and initiated on the eve of the holiday season.

Tasmania's National Parks and reserves were set aside for the protection of natural and cultural values. They belong to the people of Tasmania. These are truths that the Liberals in government appear determined to ignore.

Yours sincerely,

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Spokesperson for Parks

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