

Dr John Whittington  
Director  
Parks and Wildlife Service  
GPO Box 1751  
Hobart TAS 7001



31 January 2016

Dear John,

**REPRESENTATION – DRAFT MANAGEMENT PLAN 2015  
FREYCINET NATIONAL PARK**

The TNPA is concerned by several aspects of the revision of the 2000 management plan to potentially allow built accommodation to be constructed anywhere within the Coles Bay Visitor Services Zone:

- It is broadly accepted that a major rationale for undertaking park management planning is to obtain credibility and public acceptance for the proposed management approach. This requires meaningful public engagement during the formulation of management plans. Until recently the Tasmanian PWS has set a high standard in this regard but this draft plan has been released for statutory public comment without any prior public engagement.
- Good practice also demands that the draft plan contain a reasoned justification for the proposed changes. This is especially important in the absence of prior public engagement. The draft plan refers to the EOI for the expansion of Freycinet Lodge but this does not amount to justification for the proposed plan change. If there is unmet demand for accommodation for visitors to Freycinet, the obvious place to provide it is outside the park. e.g. on private land at Coles Bay where provision of water supply, sewerage and other services is less problematic. The draft plan makes no attempt to address the key questions of why additional accommodation needs to be provided within the national park and whether essential services can be provided there without substantial public expense and impact on park values.
- The proposed changes are not trivial. The Coles Bay Visitor Services Zone is the main entry point and most heavily used area of the entire park. It is already overdeveloped and does not make a good first impression on visitors entering an area valued primarily for its natural qualities. Good planning would attempt to improve visitors' experience of this area, not to increase the level of development. The existing PWS campsites and Freycinet Lodge are legacy infrastructure which predate the modern era of park planning. The clear intent of the 2000 management plan was to protect the naturalness of the area by preventing any further expansion.
- According to the PWS' own figures Freycinet is the most heavily visited national park in Tasmania and visitors numbers have increased by almost 50% since 1998-99 when the current plan was being prepared. The management plan is long overdue for review and the importance of the park justifies a full revision, not an ill-considered modification to one of its most important aspects, considered in isolation.

- Section 2 (Why the 2000 Plan Requires Alteration) repeats the statement that the expressions of interest are intended to provide new tourism experiences. The expansion of Freycinet Lodge does not meet this criterion. It does not provide any new tourism experiences. It provides additional accommodation and caravan sites in an area already well provided with both. It is merely the expansion of an existing commercial operation which already occupies a highly privileged position within the national park.
- Section 2 (Background to the management plan alteration) explains the alteration in terms of the EOI for the extension to Freycinet Lodge (requiring a 5.6 hectare extension to the existing leased area) yet the proposed text changes in Section 3 potentially allow built accommodation to be constructed anywhere within the Coles Bay Visitor Services Zone, an area at least twenty times larger. The justification provided for the Freycinet Lodge expansion is seriously inadequate, but no justification whatsoever is provided for opening the entire Visitor Services Zone to proposals for built accommodation.
- Section 2 (Project Assessment and Approvals Pathway) contains a statement about the role of PWS' Environmental Management Policy and Reserve Activity Assessment (RAA) but does not actually commit to undertaking a RAA on the proposed expansion of Freycinet Lodge, should it proceed. If the assessment is to have any credibility, a RAA which includes public consultation must be undertaken.

The government's determination to facilitate private development within a national park with the absolute minimum of public involvement demonstrates its contempt for both the values of the national park and the concept of management planning. This is the TNPA's greatest concern.

The proposed changes should be rejected.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C Errey', with a long, sweeping horizontal line extending to the right.

Catharine Errey  
President, Tasmanian National Parks Association