

21 September 2023

The General Manager  
Glamorgan/Spring Bay Council

**Representation – DA 2023/160  
Reinstatement of Standing Camps  
Freycinet National Park**

The DA appears to be invalid because landowner (Crown) consent for the making of this application does not appear to be included in the Council's 91 page *Exhibited-Documents-DA2023-160.pdf*. The proposed development is located within the national park (Crown land), not on council land as implied by the authorisation on page 4 of 91.

Regardless of whether the units are square metres or Ha, the size of the site (100 million somethings) stated on page 2 of 91 is clearly in error. This must be corrected.

The TNPA notes that the *Freycinet Peninsula Master Plan June 2019* (page xiii) calls for "no further built tourism infrastructure [south of the Hazards]" in order to "protect the sense of wildness for visitors who choose to venture beyond the primary day-use area as well as limit environmental impacts on the National Park". The Cooks Corner component of this proposal requires the construction of new/additional tourism infrastructure south of the Hazards. "Implementation [of the Master Plan] is a shared responsibility between the State Government, Glamorgan Spring Bay Council and the private sector" (Master Plan, page xiv). The TNPA appreciates that compliance with the Master Plan is not statutory but considers that, if this proposal is approved, Council should make a public statement explaining why it has chosen to ignore this particular prescription.

The Tasmanian National Parks Association (TNPA) has written to the Director of National Parks (copy attached) to raise several questions (particularly the absence of a Reserve Activity Assessment) related to compliance with the statutory *Freycinet National Park, Wye River State Reserve Management Plan 2000* and other statutory responsibilities of the PWS. The TNPA suggests that it would be prudent to pause the assessment of this DA until these issues are resolved.

Yours sincerely,

Nicholas Sawyer, President, TNPA

## Attachment to representation

21 September 2023

Jason Jacobi  
Director, Parks and Wildlife Service

Dear Jason,

### GLAMORGAN/SPRING BAY COUNCIL DA 2023/160

### Reinstatement of Standing Camps

### Freycinet National Park

The TNPA has several concerns relating to whether PWS has followed due process in relation to this DA.

- The DA references existing leases/licences despite the guided walk being inoperative for almost twenty years. Evidence should be provided that the existing leases/licences are still current and that the current proposal is covered by the existing leases/licences. In particular, the current proposal appears to include much more substantial tent platforms and walkways than were present in the original, to say nothing of a toilets/showers and a large water tank which are unlikely to be removed seasonally.
- The *Freycinet National Park, Wye River State Reserve Management Plan 2000* includes the following regarding a Licensed camp (page 95):

*If any structures, equipment caches and the like associated with the operation of any licensed facility and/or service providing accommodation are not removed from a site or sites in accordance with (b) above [for a total of at least 12 consecutive weeks of any calendar year] they will be considered buildings for accommodation purposes and will accord with the provision of this management plan for such buildings.*

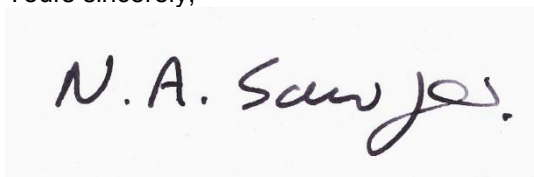
i.e. If the toilet/showers and water tank are not to be removed seasonally they must be assessed as buildings.
- The DA refers to the camps as “standing camps”. They should therefore comply with *PWS Standing Camp Policy and Procedures P-017* (the TNPA understands this to be the most recent version of this policy).
  - Section 4.3 of the policy requires that, except for camping platforms and boardwalks, “the entire camp must be removed for at least 12 weeks each year”. It is not apparent from the DA that the toilets/showers and water tank will be removed seasonally.
  - Section 5.2 of the policy includes requirements for the assessment of “new, expanded or modified standing camps” including assessment via the RAA process. There is no evidence in the DA that these have been addressed.
- The *Freycinet National Park, Wye River State Reserve Management Plan 2000* includes specific requirements for development control in sections 4.5 *Managing Development* and 5.5.7 *Assessing Development Proposals*. It is not apparent that these have been specifically addressed in the DA, in particular the requirement (4.5 *Managing Development – Policies*) that “All proposals for any development ...will be assessed in accordance with procedures approved by the Director”. The most obvious procedure for assessment is a Reserve Activity Assessment (RAA).

## Attachment to representation

- Consultant Mark Wapstra probably reflects a widespread expectation when he states (DA page 24) “It is assumed that a Reserve Activity Assessment will be needed for approval through the Parks & Wildlife Service”.
- The PWS’s RAA Overview suggests that a RAA is required for a proposal such as this: “A RAA process is required for proposals located on reserved land managed by the PWS under the NPRM Act with potential to impact environmental values” (*Guideline - Reserve Activity Assessment Process Overview - EG-340 (v1.3 effective October 2022)*, page 5).
- Page 14 of the 91 page *Exhibited-Documents-DA2023-160.pdf* includes the statement that “Parks have undertaken a RAA checklist at both sites ... and deemed that RAA’s were not required”. The omission of a Reserve Activity Assessment from the DA documentation is a major concern. A more detailed justification for the omission of a RAA should be provided.
- The TNPA notes that the *Freycinet Peninsula Master Plan June 2019* (page xiii) calls for “no further built tourism infrastructure [south of the Hazards]” in order to “protect the sense of wildness for visitors who choose to venture beyond the primary day-use area as well as limit environmental impacts on the National Park”. The Cooks Corner component of this proposal requires the construction of new/additional tourism infrastructure south of the Hazards. “Implementation [of the Master Plan] is a shared responsibility between the State Government, Glamorgan Spring Bay Council and the private sector” (Master Plan, page xiv). The TNPA appreciates that compliance with the Master Plan is not statutory but considers that, if this proposal is approved, PWS should make a public statement explaining why it has chosen to ignore this particular prescription.

I look forward to your response to these concerns.

Yours sincerely,

A handwritten signature in black ink that reads "N. A. Sawyer". The signature is written in a cursive style with a large, sweeping 'S' at the end.

Nicholas Sawyer, President, TNPA

cc GMSB Council