

**Submission  
No 355**

**INQUIRY INTO MANAGEMENT OF PUBLIC LAND IN  
NEW SOUTH WALES**

**Organisation:** Brunswick Heads Foreshore Protection Group

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We are concerned about the introduction and intensification of commercial activity in our Crown Reserves. Allowing or intensifying commercial activity in our National Parks estate will generate considerable economic pressures that will inevitably create adverse impacts on the surrounding environment and neighbouring land owners. We also have serious concerns about the management hierarchy – there is a clear conflict of interest as DOL is often the manager, developer and arbitrator of activities on public lands. There is also no clear definition of “public interest” and no one in the management team appears to be responsible for protecting this ephemeral public interest.

Our Foreshore Protection Group lodged a formal complaint with Crown Lands Minister, Andrew Stoner in June, 2012 detailing our concerns with the management of crown reserve caravan parks in Brunswick Heads. (See Attached) For over a decade our community has been struggling to get Park Management to acknowledge and address a range of encroachment, compliance, access and amenity issues generated by the park’s commercial activities.

Under DOL/LPMA’s current Management regime, competition policy and the pursuit of profits appears to override all other considerations. Plans of Management focus solely on improving park profits and all maintenance, upgrades and redevelopment has targeted the high-end market, without regard for the diminishing opportunities for lower income visitors. Legislative requirements appear to be ignored, compliance is not enforced and unsafe and inappropriate management practices are tolerated. Setbacks and buffer zones are not implemented by on-site Managers as they reduce the operational area of the parks. Failure to implement park rules also generates significant OH&S, public liability and amenity issues, which are clearly less relevant or important to park management than revenue and have yet to be effectively addressed.

Plans of Management for the caravan parks have been exhibited in 2000, 2002, 2005, 2007 & 2010 at considerable public expense. Every plan has sought to resume all encroached lands for caravan park activities, and seek to change and intensify the use of these lands, without regard for the adverse impacts on neighbours or the fragile foreshore environment. POM failed to provide accurate maps or adequate information that clearly identified road reserve encroachments, foreshore boundaries or existing and preferred new boundaries. None of the POMs has been endorsed by the Minister.

DOL has been ruthless in pursuing its redevelopment agenda. In 2007, Byron Shire Council’s Reserve Trust was replaced with Government appointed administrators, North Coast Accommodation Trust trading as North Coast Holiday Parks. Private contractors are selected by tender process to manage the individual parks. Management Plans have also been prepared by government appointed design contractors. All are employed by and are under the direct management of LPMA/DOL and produce the outcomes DOL demands.

LPMA/DOL have gone to extreme lengths to achieve their goals, replacing BSC Reserve Trust with more compliant administrators, providing inaccurate, misleading information or failing to disclose relevant information and finally acquiring the encroached lands by using a compulsory acquisition order, when other avenues failed.

The commercialisation of public lands and privatisation of management will generate significant adverse impacts for our public estate as unfortunately economic priorities tend to over-ride all other considerations, including current legislation, environmental protection and community preferred outcomes.

We do not support the introduction of commercial activity in our National Parks and believe existing activities on Crown Lands needs to be better regulated with appropriate oversight to ensure best practice, protect the “public interest” and national heritage values.