



# Sutherland Shire Environment Centre

PO Box 589 Sutherland NSW 1499 | office@ssec.org.au | ph +61 404 065 376  
www.ssec.org.au | ABN: 96 127 431 611

27 August 2017

The Planner  
NPWS  
Box 144 PO  
Sutherland NSW 1499

Dear Sir

## **ROYAL NATIONAL PARK, HEATHCOTE NATIONAL PARK AND GARAWARRA STATE CONSERVATION AREA : DRAFT PLANS OF MANAGEMENT DISCUSSIONS PAPERS 2017**

As neighbours of “Royal Reserves”, Sutherland Shire Environment Centre (SSEC) is aware of the difficulties faced by NSW government in satisfying the many and often conflicting desires of the community when it comes to use and protection of these historic and unique areas.

We have been arguing for World Heritage Listing of the Royal Reserves for many years now through our First National Park committee and hope that you will use the report by Dr Geoff Mosley, *The First National park, A Natural for World Heritage*, as an important resource in your deliberations of the new Management Plan. (We will send a copy under separate cover.)

We have seen the submissions by National Parks Association (Southern Sydney Branch) and Colong Foundation for Wilderness and strongly support the views contained in them. We would like to add the following points:

### **1. Recreational activities**

- a. When deciding how to make best use of the limited space and natural resources of Royal NP, it is good to remember the purpose for which it was set aside in 1879: “for public health and recreation, convenience, or enjoyment”. The goal therefore must be to find uses that allow the greatest use, rather than trying to meet the desires of a privileged few.
- b. We support the improvement of existing walking tracks, including addressing erosion and directional signs.
- c. Provision of glamping facilities is contrary to the egalitarian goals of the founders of the park. These are private facilities which will be out of the financial reach of a great many Sydney residents, the very socio-economic group for whom the park was originally created. Not for those who already had access to large gardens and

even country estates, but those who were living in the burgeoning city. These people could once catch a train into Royal National Park and walk down the hill to Audley to enjoy a day of relaxation and fresh air.

- d. Public transport should be extended into Royal NP to decrease traffic congestion in the park on busy weekends for the benefit of native fauna and visitors alike.
  - i. A shuttle bus from Sutherland-Otford with stops at Audley, Wattamolla, Garie.
  - ii. A shuttle bus from Bundeena Wharf, Marley, Wattamolla, Curra Moors, Garie.
- e. Road bikes on Audley road. Consideration could be given to closing Audley road (uphill) in the mornings on weekends. Cars would still be able to use the road in a downhill direction to travel TO Audley, but cyclists would not block traffic or be at risk from cars travelling up hill. Cars leaving Audley (before noon) would need to use McKell Avenue. Cyclists (promotion through cycling clubs/groups) could be encouraged to complete their ride before noon.
- f. Sufficient provision is already made for kiosks, etc. There should be no further built development in the park. Any improvements should be within the footprint and height of existing development.
- g. Greater use should be made of the Dance Hall at Audley for community events.
  - i. The cost of hiring the hall needs to be affordable (comparable to other venues in Sutherland Shire).
  - ii. Attendees should be provided with free or reduced park entry.
  - iii. Hirers should be able to provide their own catering (if necessary restricted to tea/coffee/“bring a plate”).

## **2. Visitor destinations**

- a. The preferred method of addressing overcrowding in popular destinations is to limit visitor numbers. The capacity of Royal NP is finite and we cannot expect such a small park to cater for every visitor to Sydney as well as its ever-increasing number of residents.
- b. Out of date facilities should be upgraded, but not expanded. High usage demand is no excuse for environment destruction. Conservation of nature must come first. (NPW Act, 1974)
- c. Facilities should not be privatised.
- d. SSEC supports the suggestion of online booking systems for the more popular areas, as well as limiting the overall number of vehicles permitted to park in within the boundaries of Royal NP at any time. If necessary the park must be closed at peak times once capacity is reached. (Hopefully online bookings as well as social media will help to provide people with alternative experiences.)

- e. Where excessive use is damaging the surrounding environment, the reaction needs to be rehabilitation, not expansion of the facility.
- f. Figure Eight Pools, Wedding Cake Rock. These areas which have been promoted through social media both have safety issues. Again, as we have repeated throughout this submission, more resources are required for policing, both for regulation and safety. An increased ranger presence across the park would improve the user experience for everyone.
- g. We strongly support the introduction of technologies that will assist to collect park use fees. Our members have reported a great many vehicles parked without any display of parking permits/tickets, even in the Audley precinct. This loss of revenue must severely diminish resources available to NPWS.
- h. We also support the suggestion of online booking for busy precincts. While car parking in high use periods is an obvious problem, even the crowded nature of these areas can make use unpleasant for everyone unless limits are set. The provision of public transport into popular locations of the park, as set out in section 1 d of the submission would assist in addressing traffic and parking issues within the park.
- i. Our members have reported on many occasions people with dogs in the park. While this is a problem common to parts of the park that adjoin developed areas (e.g. Bundeena, Grays Point, Heathcote), there have also been instances where pets have been seen in Audley, both on Lady Carrington Road and even at the coffee shop. A lack of resources to adequately police illegal use (dogs, mountain bikes, fires, camping, removal of plant material) needs to be addressed. As well as additional rangers, an education program could be delivered to adjoining residents and all local real estate agents (some agents, perhaps unwittingly, promote the park as a venue for these activities). Private businesses that are awarded tenders to operate in the park, such as the Audley Weir Café, need to educate their employees to uphold the park rules and refuse service to customers who break them (i.e. customers bringing dogs into the café should not be served as it undermines park policy when hundreds of other patrons are given the message that this rule is not enforced).

### **3. Aboriginal culture**

- a. Garawarra Farm would appear to be a suitable location for a cultural centre that recognises, respects and supports the connection of the Dharawal language group to the RNP lands.

- b. This area could provide employment opportunities for the Dharawal community, for example walking tours of the park, indigenous “bush tucker”, etc.
- c. The Garawarra site could also continue to provide parking and toilets for people accessing the Coast track.

#### **4. Mountain biking**

- a. As frequent park users our members have been dismayed at the damage caused by the proliferation of mountain bikes and illegal track work. Sutherland Shire Environment Centre is completely opposed to the draft plan proposal that these tracks be accepted as an expanded network for several reasons:
  - i. Mountain bikers are less than 1% of park users.<sup>1</sup>
  - ii. It is causing significant erosion along Temptation and Savilles creeks which were noted as significant habitats for the vulnerable Giant Burrowing Frog on NPWS signage (tracks TC6 and TC9 - Dirt Art survey designation).
  - iii. The fast speeds that mountain bikes travel down the narrow single tracks is hazardous to walkers who frequent these smaller tracks, particularly the track designated as TC2 in the Dirt Art Survey and nicknamed “Nature’s Revenge” by the mountain biking community.
  - iv. Provision of an expanded network for this minority group will not decrease a further proliferation of illegal tracks as evidenced by the provision of ‘trial’ single tracks. This trial has exacerbated the problem leading to illegal track work and spray painting trail names on rocks and nailed into trees.
- b. Mountain biking by its very nature tends to be unsustainable. Most users, especially experienced users, are looking for tracks that are challenging. High use of a track not only “flattens” the bumps, widens the track, but also creates a familiarity that means the experience does not have the same thrill as the “unknown”. This encourages creation of new tracks which are then promoted to colleagues. This tendency is obvious in the illegal creation of track around Temptation Creek. Despite being provided with “legal” single track options, more advanced riders have sought greater

---

<sup>1</sup> The 2010 NPWS discussion paper found 4% of park visitors are cyclists. In the Dirt Art survey referenced in the discussion paper, the respondents who indicated an historical preference for cycling on unsealed roads/tracks (Table 2) ranged between 11% and 20%. Based on this, the proportion of cyclists in national parks who require the type of facilities posed in the strategy, would be at most 20% of the cyclists who are park visitors. That is, 0.8% or less of park users.

- thrills by “bush-bashing” tracks along Temptation Creek, and down steep hills.
- c. Mountain biking is best restricted to existing fire management trails which are of a width that is compatible with the speed at which bikes travel. Single tracks (whether bi-directional or one-way) are too narrow and cannot safely cater for both cyclists and walkers.
  - d. Any mountain bike track network that is provided must be at beginner and intermediate level only. There should be no attempt to promote advanced level tracks within RNP as locations that are suitable for the creation of advanced level tracks can be found outside the national park estate. Parts of the Gandangarra Aboriginal lands in West Menai, the bike track at Menai tip, ANSTO Lands, as well as State forests which would appear to be ideal as for the frequent creation of new and challenging routes in areas that are not set aside for environmental conservation.
  - e. Better policing of illegal tracks is needed by both informing the mountain bike community and promptly closing any illegal tracks. Compliance will only be effective if there is an increase in staffing/ranger resources. Clear signage and maps, both online and at the visitor centre should clearly indicate to visitors which tracks are allowed to be used by bikes. An education program is also required to ensure local bike shops and schools are fully cognizant of which tracks are legal and which are not. This program needs to be run annually to inform new school groups that participate in MTB-ing as an elective “sport”.
  - f. SSEC is opposed to the construction of a MTB bridge across Kangaroo Creek and the extension of bike tracks through the rainforest area. This area of bushland is important as a refuge in time of fire and should not become degraded by further development (i.e. track construction).
  - g. The Burgh Track should be marked on maps as a WALKING track as it provides an important link from Helensburgh to the Coast.

In conclusion – our members question why the draft plan has chosen to so heavily favour a minority group of park users (advanced mountain bikers) whose behaviour threatens the safety and enjoyment of the park by others and impacts so heavily on the conservation values the park is supposed to uphold. We fail to understand why Dirt Art Consultancy was contracted to run a survey that was so obviously biased towards the desires of an elite group of park users who have been conducting illegal activity within the park. Endorsing these activities by making the illegal tracks part of an expanded network is completely at odds with the values of the park to conserve the native flora and fauna for the enjoyment of most visitors.

## **5. Commercial Activities**

- a. Given that overuse is already a problem at many popular destinations in the park, any expansion of commercial activities should be targeted at increasing visitation during off-peak times.
- b. Where commercial activities are impacting negatively on the natural environment then operators should be educated, fined or excluded.
- c. Providing development opportunities to private commercial operators is contrary to the “public” nature of our national parks.
- d. Commercial activities should be based in surrounding centres, e.g. Bundeena, Maianbar, Helensburgh, Heathcote, Waterfall, Engadine, Loftus, Sutherland, Grays Point. There is plenty of opportunity in these places for “eco-tourism” operations and State government should work with Sutherland Shire Council and local business groups to fulfil existing gaps in the market. There is no need for commercial operations to be based within the boundaries of the park.
- e. Adventure activities are not necessary. There is sufficient visitation resulting from existing facilities and activities. A national park is not a theme park. On the contrary, nature offers sufficient “adventure” without the need for artificial additions.
- f. Organised sporting activities (fun runs, challenges, etc) can also be in conflict with the purpose of the Act, which is primarily concerned with conservation and providing an opportunity for all citizens to appreciate nature. The areas suggested for such events are already heavily used and such events are not necessary to promote them to the wider community. Instead they would displace existing park visitors.
- g. Accommodation facilities within the park should be limited to existing NPWS cabins, hostel accommodation at Garie Beach, camping at Bonnie Vale. Royal NP’s proximity to Sydney (high population, international tourism) makes it inappropriate for expanded bush camping facilities. Glamping type facilities privatise land that should be publicly accessible.

## **6. Protecting park values**

- a. Section 30E of the National Parks and Wildlife Act 1974 states that the provision of visitor facilities must be compatible with park values to ensure an enjoyable facility. Park values (see b below) trump visitor use. It is not possible to modify the values clearly stated in the Act to accommodate the wishes of particular visitor groups or commercial operators. Adaptive management is about

adapting the behaviour of users to the environment, not adapting the environment to fulfil the fantasy of the visitor.

- b. We are disappointed to see this discussion listed last, and hope that this is not an indication of the priority (or lack thereof) that is being placed on what SSEC believes is of utmost importance. We note that the objectives of the NPW Act are (a) the conservation of nature, (b) conservation of objects, places or features (including biological diversity) of culture value, (c) fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation, and (d) providing for the management of land reserved. However, we note that the discussion papers do not appear to address these objectives.
  - i. Conservation of nature. No information is provided about the range and diversity of flora and fauna or about its conservation status. Similarly, there is no information about connected natural systems, geodiversity or water.
  - ii. Conservation of cultural value. The establishment of Royal NP was instrumental in the development of the philosophy of the conservation of nature in Australia. Little or no information is provided on cultural/built history in the discussion papers.
  - iii. Fostering public appreciation, understanding and enjoyment of nature. Not all recreation activities are compatible with the objectives of the Act which protects our national parks. Challenging mountain bike tracks, large scale group activities, permanent/exclusive commercial activities are inappropriate and should be confined to areas outside the national park estate.
  - iv. Public appreciation of this already overused area will not come through greater development, privatisation and destruction of natural attributes. Appreciation is more likely to arise when the community sees that its government holds this area in great esteem, is prepared to allocate sufficient funds to protect and restore it, and is educated as to why this is being done

Thank you for the opportunity to comment.

Yours sincerely,

Jenni Gormley  
Chairperson

Tassia Kolesnikow,  
Secretary.