



## Friends of the Royal National Park Incorporated

ABN 34 245 207 460

### **Response to the Discussion Papers for the Royal National Park, Heathcote National Park and Garawarra State Conservation Area, new, Draft Plan of Management.**

The Friends of Royal National Park, (including Heathcote National Park and Garawarra State Conservation Area), wish to thank the National Parks and Wildlife Service for this opportunity to comment on the six discussion papers

#### **Introduction**

Friends of Royal (FoR) was formed in 2009, today we represent individuals and members of organisations that, in the main, have multi-layered interests in the three “Royal areas”.

The formation of FoR facilitated the linking of people of diverse interests within the Park(s) and our gatherings promote discussions on the current happenings within the Park and on the issues that reward, and, sometimes, confront us.

In the preparation of this response to the discussion papers, we have drawn on our knowledge of the Park, our interactions with Parks staff, Indigenous representatives and of other Park users.

We have referred to the promises and failures of the current Plan of Management, 2000, to the content of later documents such as “[Managing Natural and Cultural Heritage in Parks and Reserves: National Parks and Wildlife Service, June 2004](#)”. “[State of the Parks Report, 2004](#)” and [2007](#), and “[Challenges in the landscape, 2009](#)” ; news media reports, and NPWS Annual Reports, and other documents, all in an endeavour to use the information to provide meaningful input to these discussion papers.

**Royal National Park** is Australia’s first National Park, the (first) area was reserved from sale on [31 March 1879](#) and Gazetted for the Purpose of a National Park on [26 April, 1879](#). The size of the Park was almost doubled on [3 August](#) of the following year, and since that time areas have been added to, and revoked from, the Park. [[1239ha \(3061ac\) revoked in 1903](#)]

The original concept for this *National Park* was to be an area chiefly dedicated for public recreation, however, as time progressed, the notion of conservation edged into the discussion and the Park became a crucible for the conflicting ideas and ideals of many influential players.

These discussions continue today on many fronts, with the recently mooted threat of a massive incursion into the Park by the creation of a new F6 road easement on the western boundary of the Park to Heathcote or Waterfall being a case in point.

Today we have a Park that serves twin purposes. It provides a refuge for a mesmerising variety of plants and animals that must be preserved into the future, yet it also provides for the enjoyment, learning and wellbeing of humankind. There is also an element of cultural history that must also be preserved, both Indigenous and European.

*“There are six IUCN protected area categories, although only four of them are generally funded under the National Reserve System Program.*

*Royal National Park is a Category II National Park: Protected Area managed for ecosystem conservation and recreation. Category V also applies as a [sic] area of land, with coast and seas as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, cultural and/or ecological value, and often with high biological diversity.*

*Safeguarding the integrity of this traditional interaction is vital to the protection, maintenance and evolution of such an area.” (Royal National Park, Coastal Cabins Areas Conservation Management Plan 25<sup>th</sup> July 2005, p116 )*

The goal of the new Plan of Management must to meet this challenge in a balanced and professional way, whilst also fitting into the wider Plan for the preservation of the significant natural assets of Greater Sydney Region, and, at the same time, to partly fulfil the recreational requirements of a growing Sydney population.

There is an intent to comment on each of the Discussion Papers in a way that hopefully fulfils the reviewers methodology and which will readily convey our thoughts on the various topics.

Before we start on the papers, however, **there is a very obvious issue that feeds into all of the Papers and which must be stated:—**

Today, the basic infrastructure of the Royal National Park, and its associated reserves, are in a highly lamentable state and unless the underlying issues that have brought us to this position are addressed, the new Plan of Management will fail and the efforts of many people here will be wasted.

We will not dwell on this point, but if you do not understand the problem, we suggest that you simply take trip to Audley, on your doorstep. Look at the state of the unlined, potholed, muddy and waterlogged carparks, the potholed roads, the aging facilities, the broken toilets, the weedy and silted water-ways, the condition of nearby tracks and bush trails, and if you do not understand the enormity of the problem after such a visit, then may we respectfully suggest that you are probably in the wrong job.

For while we may lament the lack of respect for the Reserves by some visitors, manifesting itself in littering, or in the occasional acts of vandalism, it must be said that the facilities of the Park today do little to instil the sense of the respect that we believe that it deserves.

## Discussion Paper No1

### RECREATIONAL ACTIVITIES:

p 1.

- Under Factors affecting how we manage: the statement is made that there is easy access by public transport. That is not so, the misleading word here being “easy”.

The Public Transport Web site refers to one via public transport, the entry via train to Gymea then a bus to Grays Point for a 3.5km walk to Audley. It does not mention the Bundeena ferry or any of the other entry points, Engadine, Heathcote, Waterfall, Helensburgh or Otford. (given the signage at those destinations, perhaps just as well.

p 2.

- Under Planning for the future - Walking: the statement is made that there is an extensive network of walking tracks. True but a lot are not well maintained or signed.

Aside from the recent coast track upgrades, it appears that refurbishment and maintenance of tracks was stopped across the whole of the three parks soon after the installation of the Thelma Ridge Track and the Burning Palms metal walkway in 2004.

The highly eroded track network is, in the main, the result of 13 years of neglect, and not by overuse, but mainly by the simple failure to clear blocked drains.

It is not the visitors who cause the erosion, but water, and the simple role of the visitor has been to keep these new waterways clear of debris and perpetuate the erosion.

- "*Future management ... will focus on sustainability...*"

The introduction of *Fibre Reinforced Plastic* (FRP) to some areas is welcome, it will allow for the re-establishment of drainage lines and also offer a reasonable and cost-effective solution to fragile sections of the track. BUT, there is also a massive caution here, the resilience of FRP walkways in fire-prone sections of the Park has not, in our opinion, been properly tested and there appears to be a great risk that a large uncontrolled fire will destroy the FRP network.

- An option mentioned is considering proposals for new walking tracks. It would make a lot of sense to develop the tracks on the west side of the Park and making access to the train stations easy. This would take pressure off the roads through the Park and off the iconic coast venues.

It is stated:—

*Many people visit parks to enjoy natural surroundings and get away from everyday life. Maintaining these qualities of naturalness and remoteness has to be balanced against the provision of visitor facilities that may be needed to protect the environment and ensure an enjoyable experience.*

We concur with the statement, however, it must also be said that Royal is acknowledged as a suburban Park, close to 5 million residents plus tourists. Persons who are seeking a wilderness experience may be disappointed.

In relation to visitor facilities we despair at the state of toilets in peak times and systems need to be put in place for multiple servicing times throughout those times.

We also observe that National Parks appear to select waste management systems that have high “environmental” standards, but which fail in use, not necessarily from such use, but by a failure to properly maintain the facility. The Innoflow/Orenco system that was installed at Wattamolla in 2010 has now been replaced due to its frequent downtime and wait-till-it-failed maintenance. As well, leaking cisterns (24 hours, 7days) contributed to the load on the tanks and soak-away trenches.

The Garie toilets have a similar sorry history.

Please forget the “Technology” and select simple systems that have a proven track record for similar situations and instigate and follow a maintenance plan. Ensure that new systems are designed to cope with disposable hygiene products and wipes.

p 3.

### Royal Coast Track

- How would implementing a booking system for the Coast track be helpful? It would seem impossible to police given the porous nature of the Park boundaries.

As a general statement there is no Parks staff presence along the coast track now, and a Pass system would seem to be doomed to failure.

In relation to camping at North Era—Given the regrettable state of the majority of vehicle accessible toilets within the Park, due, in the main, to lack of maintenance, the claim that the North Era site is difficult to service as a justification for its closure is a moot point. North Era is currently the only recognised campsite on the Coast Track, however, unauthorised camping flourishes at many locations along the route.

The location serves a large and diverse groups of campers and although opinions vary within our FoR members, there is support for its retention as an authorised camping area. An effort should also be made to survey the people who currently stay at the site.

The proposed option of turning the site over to commercial operators is not supported.

The current PoM has as a “**High Priority**” to “*Rehabilitate former bush camping sites*” (Page 67), however, we would observe that bush camping still flourishes today and that under-resourced managers are powerless to stop the practice.

There is support for a camping facility at Garawarra Farm if it is undertaken in conjunction with the Aboriginal community and provided it does not detract from the social work that they are currently undertaking there.

Water at Garawarra farm will be an issue and a study should be undertaken to review the options here. The roof of the current residence would appear to have a catchment of around 200kL per year, and unobtrusive in-ground concrete tanks could be installed to service the location.

p 4.

-Mountain Biking. There was earlier support for this activity from some members but given the large increase in unauthorised tracks in the last 12 to 18 months, there is a feeling that under resourced Parks staff will lose control and the area will be trashed.

We believe that there is a feeling that the area is now a Mountain Bike Park within the National Park, and not a National Park where Mountain Biking is permitted.

Under Future directions - Camping: is an on-site compound manager at Bonnie Vale necessary?

- Providing overnight opportunities for drive-in visitors - what does this mean? Does this mean providing accommodation? Are we to see the beginnings of another Murramarang Resort with the lease flogged off to the highest bidder.

- Providing for campervans is not defined, no information as to how many or where.

Re commercial tours, small low impact, mid week tours as have been conducted by Sydney Coast Walks, do not appear to have impacted on the popular visitor destinations but we are against consents that will detract from today's publicly available picnic sites

p 5 Horse riding at Kelly's Falls is to be phased-out due to adverse impacts on the area.

Horse riding at the western side of Garawarra SRA is to be investigated and a report furnished for further assessment. Provided environmental standards are adhered to we have no objection to the practice.

Adventure activities, we concur with the statement of *future directions*

Water-based activities

p 6.

- Phasing out of jet skis from Bonnie Vale appears to be a reasonable proposal.

It is noted that NPWS and NPWS volunteers use the Bonnie Vale boat ramp to launch and retrieve vessels.

It is not known by us if RFS or SES or other emergency services use the boat ramp facility? The REF for the earlier proposed boat-ramp (April 2002) does not mention emergency services.

<http://www.environment.nsw.gov.au/resources/parks/refFinal.pdf>

- A revised study on the impacts of powered motor craft entering Cabbage Tree Basin south of the foot bridge needs to be undertaken to determine future management options for the area.

Group activities, raise group numbers to 40 and also grant blanket exemptions to certain groups on specific application, based on the location and description of the activity. E.g. Surf Clubs, Landcare, Cabin community activities, Other?

P 7

Drones – Ban them (unless they have written permission)!

Access to parks on days of high fire danger, for discussion with effected groups, Audley Café, Boat Shed, Surf Clubs, Cabin Communities, Bundeena and Maianbar Residents.

P 8

Adaptive management,

Wedding Cake Rock and Figure 8 Pool are two examples of reactive management whereby Parks have been slow to respond to the visitor pressure that has been applied to the destinations.

It was on 8 June, 2014 when Fabien Ardoin fell to his death from Wedding Cake Rock. At that time crowds were thronging to the Rock and this has continued un-abated for 3 years before a toilet block was commissioned at the track head at Bundeena. Similarly, at figure eight pool, as visitor numbers grew through 2015, it did not attract Park management's attention until a series of incidents beginning later that year and into early 2016 meant that something had to be done. This was despite attention being drawn to the pending safety issues by the Burning Palms Surf Club who were attending to injured visitors on a regular and increasing basis.

The other issue had been the "leaky" park fee, usually midweek, at Garie, Wattamolla, Garawarra Farm and Audley. Many of the visitors would pay if they had to but most didn't.

The installation of ticket machines during 2017 will no doubt improve this situation, but will not capture all.

## **Discussion Paper No. 2**

### **VISITOR DESTINATIONS**

#### **Introduction**

The paper on Visitor Destinations carries an undated photo of Wattamolla on the cover. Take a moment to zoom into the access road and note the cars that are parked on that road. Such parking is now banned, with the loss of over 100 parking places, albeit perhaps for good safety reasons, but with the loss of approximately 20% of the available parking close to the Wattamolla precinct.

Similarly at Garie Beach from the early '70 the carpark had a capacity of approximately 330 cars. This remained so up until the winter of 2005 when an "Upgrade" of the area saw the carpark downsized to 178 cars (and 2 buses), a massive loss of 150 places.

What does the discussion paper say?

*"On warm weekends and holidays the coastal precincts in particular are increasingly overcrowded and facilities can be stretched beyond capacity often resulting in some areas being closed to further visitors on that day."*

With the combined loss of around 250 car spaces at Wattamolla and Garie beaches, is it any wonder that the current carparks quickly fill in times of high demand?

The chaos that ensues there on the days mentioned has, in a large part, been confected by past NPWS policy decisions.

It is noted that the Heliport area on the top of the south Garie Head has been designated as an overflow carpark, however, road entry and exits are overgrown less than ideal and the park and road entry surfaces are poor and no proper tracks or signage have been installed.

At Audley several of the parking areas are in such disarray that a conservative estimate of a loss of 10% to 15% of available parking has been lost to poor maintenance standards. At

Figtree Flat a large pot-hole in the carpark has been adopted as a home by the local waterbirds.

What will change to correct this situation??

### **Discussion Paper 2 Comments:-**

#### 1. Demand for Royal Recreational Space :

The Discussion Paper rightly raises the issue of an increasing demand for Royal recreational space and the current problems of limited car parking and facilities. The previous 2000 PoM (p43) however also stated this as a problem : “The heaviest use periods are fine weekends, public holidays and school holidays when the popular areas are often full to capacity or over-crowded.”. It appears that no real or enduring solutions have been implemented since the issue of this previous plan except to reduce available parking at key destinations.

1. The extent and timing of the demand needs to be modelled. This should be a pre-cursor to any discussion over facilities requirements.
2. The NPWS already has access to surveys of visitor domicile. Projecting increases for various visitor domicile segments should not be difficult supported by projections of increased urban density / population growth particularly in key visitor source areas (eg Sutherland Shire, St George etc).
3. The previous 2000 PoM included a forecast of demand but only for the years 1989 to 2001 (ie for the decade or so prior to the report’s release).It did not however
  - (i) extend the forecast beyond the year 2000 nor
  - (ii) include any discussion of the impacts of increased demand.. It is not clear whether the solutions it pointed to ie contribution to regional recreational plans, manage overcrowding or promote alternative areas, had any real impact, if in fact these actions were actually implemented.
4. Once likely demand is more defined over the medium term (say 20 years), then facilities considerations such as provision of car parking etc. should be able to be evaluated in more detail.
5. For example, an outcome of visitor growth forecasts may mean that the demand for car parking is forecast to increase such that any additional space provided will be quickly swamped within a few years. “Park’n’Ride” or “Train’n’Ride” options may be a better solution to catering for growing demand. These types of solutions appear widespread in Europe in situations of limited City and tourist-destination parking.
6. Car parking facilities could be preserved for off-peak times and converts to booked spaces in peak times when swamped by demand. A park’n’ride solution at least allows access to all for what are public recreation spaces.

7. Visitor demand appears only to require “limiting” on fine-weather summer and long weekends, other times of the year not representing a problem for facilities overload. “Park’n’Ride” solutions may evolve in future years to be the only way of accessing high-demand areas during these peak usage times.
8. The suggestion (p3) re spreading visitor demand over the low-mid season does not seem to make sense.
9. More specific information concerning forecast demand needs to be provided by NPWS to support a fuller discussion of these matters.

## 2. Park Access :

Park Access has a number of problems some of which are raised in the Discussion Paper :

- The 2000 PoM stated that 94% of visitors to the Royal arrived by private vehicle with bus and train making up the balance. Little has been done to encourage or support other means of access despite the 2000 PoM action (p48) “ The use of public transport will be promoted as a convenient and environmentally sound method of access to the three areas” (ie Royal NP + Heathcote NP + Garrawarra SRA)”.
- This issue however is not repeated in the current Discussion Paper and conversely states a key Royal management factor (p2) as : “Relative ease of access by public transport, including ferries, buses and trains as well as private motor vehicles”. It is not clear why there is a change in position between the previous PoM and the Discussion Paper.
- Currently there is no real positioning of or support for railway stations as Royal access points.
- The Royal is poorly signposted from various railway stations. Trackways to the Royal from Loftus, Heathcote, Engadine railway stations (and to a lesser extent, Waterfall) are poor and confusing. Loftus is particularly a problem because of its possible use as a close access route to Audley facilities. Otford station is a viable access point but only for Royal Coast Track walkers.
- There is no bus shuttle access from any railway station to the key Royal locations in peak recreation times (eg November to April). Sutherland might represent a key bus shuttle access point, dropping off and picking up visitors at various Royal locations. There is only a limited bus service from Bundeena to Miranda and Engadine which runs one day (to each to these locations) a week. There is no week-end bus service within the Royal.
- The walkway to the Royal Coast Track from Bundeena wharf is poorly sign-posted (check).

- Extending the Bundeena ferry service for later pick-up (say until 8:30pm) for returning Royal visitors to Cronulla in summer months may be feasible.
- Installing parking meters adjacent to the Bundeena Coast Track gateway may be a way of limiting car parking demand provided that there are alternative shuttle alternatives.

### 3. Facilities

As a general statement, expenditure on facilities, particularly for parking and maintenance, has historically not kept pace with visitor demand. The above mentioned 2005 Garie precinct “Upgrade” (downsize), The Bonnie Vale camp area with its relatively new, but now rapidly aging facilities, the overhaul of the Audley Dance-hall, and BBQ upgrades (2012), and the current and ongoing investment in the Royal Coast Track which is part of a Sydney Landscapes tourism initiative. Funding for the Royal otherwise has lagged Sydney south population growth. Frequent restructuring and staff cuts have meant that the NPWS focus on maintaining the Royal as an iconic recreational reserve (see points bottom page 1 of the Discussion Paper) and conservation area has waned over the period of the 2000 PoM. Point 2, bottom of page 2 suggests a caveat on facilities upgrade “consistent with priorities and resource availability”. This statement appears to support a continuation of facilities degradation rather than setting clear investment benchmarks to ensure that the Royal is maintained as an iconic and global class visitor destination. Key specific observations are as follows :

#### (a) Toilet Facilities :

- Toilet facilities across the Royal are in poor condition. There does not appear to be a service or maintenance standard that applies to these facilities (compare City Rail, Sutherland Shire Council). Friends of the Royal prepared a survey in September 2015 to bring this issue to the attention of Royal Management but funding for this issue was quoted as the key reason for inaction (“If we spend money on this issue, we’ll have to cut back funds for the Royal Coast Track”).
- Friends of the Royal are currently updating the Toilet survey. The majority of problems identified in the previous report have not been addressed.
- The facilities are not consistent with “one of the most visited National Parks in NSW” nor “its status as the world’s second oldest national park” (p1 of the Discussion Paper”).
- The recent commissioning of the Beachcomber Ave toilet has come 3 years after Wedding Cake Rock site took-off in popularity, an example of a long time-lag in the response for a much needed facility.

- Jibbon Beach is accessed by Bundeena residents, ferry passengers, motorists and by the boating fraternity. It is subjected to high visitation rates during holidays and fine weekends. There are no public toilets in the area and people accessing the hind dunes to answer calls to nature are degrading the fragile environment there. It is recommended to review the toilet situation here as a matter of importance and consider the re-erection of 250m of the western end protective fencing (erected around 2003) that has been damaged by storms and high tides during 2015 and June 2016. Install a mains fed drinking-water tap near the western end of Jibbon beach.
- The toilet survey is available for use by the NPWS PoM team

#### (b) Roadside Signage

Friends of the Royal conducted a survey from late 2015, to mid 2016, of roadside signage issues covering notices of parking or approaching sites. The report was submitted to the then Royal Area Manager on 20 June, 2016.

- The report found that roadside signs indicating parking or names of tracks were present in less than 50% of instances.
- Trackhead signs were present in 70% of instances but a significant number were in poor condition. In 16% of instances there were no trackhead signs at all.
- The report provides details of the top 10 roadside signage priorities and also details instances of unacceptable carpark conditions (highly eroded or significant water ponding)
- Royal management were supportive of many the actions recommended but there has been little or no implementation of the solutions.
- A copy of the report is available for use by the NPWS PoM team

#### (c) Litter Management

- Litter management represents a significant allocation of Royal costs and staff time.
- The 2000 PoM noted (p46) "In all other areas of Royal National Park, Heathcote National Park and Garawarra State Recreation Area visitors will be encouraged to take their rubbish away with them". There does not appear to have been any implementation of this action, certainly there is no signage directing visitors accordingly. While this proposed action might be debateable re its likely effectiveness, no alternative appears to have been implemented.

- To-date there is no over-arching Royal strategy for litter management or prevention. Directional signage shaping visitor litter behaviour is minimal and there appears to be little recognition of or leverage from the NSW Government's "Hey Tosser" program.
- Roadside litter collection is a particular problem.
- Royal management are currently developing a litter management strategy which hopefully can integrate the use of volunteers in litter management more broadly. Re visitor litter behaviour, apparently "NPWS are currently developing a public engagement strategy in 2017-18 to communicate key messages.....on site".
- The issue is important given expected growth in visitor numbers ie the litter issue is not going away.

(d) Other Facility Issues

- Provision of Information : Hard copy maps are important as an adjunct to digital information in the following circumstances :
  - Where screen size (eg mobile phone) is too small to register the detail required
  - Where mobile coverage is patchy or non-existent
  - Where the user is not digitally literate
- Camping : The North Era camping ground should be preserved at least until an alternative is well-established. This site represents one of the last "natural-bush" camping sites in the Sydney area and is iconic for such uses as Duke of Edinburgh programs, school excursions etc. The Garrawarra site may be able to be augmented with a camping facility which still retains a "bush" feel. The Garrawarra farm site may also be useable as "bookable" hut accommodation supporting overnight Royal Coast Track walkers.
- Audley Precinct :
  - Visitor Centre Upgrade – the presentation and size of the Audley visitor centre is very poor given the number of visitors received by the Royal and its iconic status as an Australian National Park. The centre is also poorly presented compared to other NSW National Park visitor centres (eg Blue Mountains NP, Kosciuszko NP, Sea Acres NP)
  - Hacking River Dredging – the section of the river upstream of the Audley weir is in need of dredging with many sections impassable by rowboats and subject to aquatic weed growth.

## Discussion Paper No. 3

### ABORIGINAL CULTURAL HERITAGE AND LANDSCAPES

#### Introduction

It is pleasing to note that the paper recognises the Royal Areas as a Cultural Landscapes and that the Park that we see today is the result of the work of nature and its complex interaction with people over thousands of years.

Too often, influential people of today give little credit to the processes that have shaped our Parks with the result that past practices have been stymied by ideological notions that National Parks form places that must be freed from the influences of man.

It is most pleasing to see the utilisation of Garawarra Farm as a destination for Indigenous People and to offer our support to their initiatives and their endeavours at all locations throughout the three Parks.

The connecting to Country initiatives will hopefully result in a greater understanding of the past management practices and, as such, will provide both a place of education in Indigenous matters and to guide management practices into the future.

In relation to Garawarra Farm, we would seek assurances that any further development of the area would only take place with the full approval of the Aboriginal Community and we would support the restoration of facilities there.

Aboriginal Engraving Site, Jibbon. Review the deteriorating aesthetics of this locality and institute a management plan for the site. Particular attention is drawn to the re-sprouting *Leptospermum laevigatum* species and other plants in the depressions of the rock platform and consideration is to be given to the careful removal of such plants to ensure that overgrown and sub-soil archaeology remains intact.

## Discussion Paper No. 4

### MOUNTAIN BIKING

It is perhaps disappointing that our members support for this activity has now largely been withdrawn, as we do understand the attraction of the sport and the role it plays in the lives of the enthusiasts.

The reason for the withdrawal has been due to the proliferation of a network of new tracks in the Temptation Creek area since the 2015 *DirtArt* Track Audit was undertaken, some now passing through seemingly sensitive areas that will not offer long term sustainability.

This, we believe, shows both a lack of NPWS resources to guide the Mountain Bike (MB) fraternity in the use of the areas, or a commitment to close off unauthorised trails, but also the inability of the MB members to self-regulate their activities.

If NPWS cannot regulate an area that is 1/2km from their office, then what hope do they have in managing East Heathcote, the Heathcote pipeline area or Helensburgh and Garawarra SCA.

No doubt good work has been done in the past in liaising and working with MB members and the laying and fortifying of some of the tracks has been commendable but the current situation is totally unacceptable.

If the Government wishes to promote the activity, then it must be resourced, and clearly such support has not been forthcoming.

## **Discussion Paper No. 5**

### **COMMERCIAL ACTIVITIES**

Friends of Royal take a very cautious view of this topic.

At a Wattamolla Masterplan meeting on 25 October, 2015, FoR members were apprised of a proposal to install a commercial camp-site at Wattamolla. The consultant advised that the business would require 30 hard-floor tent sites minimum and that the lease would be offered to international hotel chains or such, that had the necessary access to a large customer bases and which would enable them to sustain the facility. A restaurant and ablutions facility were also proposed but no details were provided as to the locations.

We viewed this as an unacceptable incursion into what is now a shrinking public space at Wattamolla, (to qualify this statement, view historical aerial photo's where it can be seen that the natural bushland is pushing into the open areas).

Also at Bonnie Vale, a proposal to lease the area may have unacceptable consequence by the loss of the simple style camping that is undertaken there today.

Put simply, we do not trust Government to be able to control these areas once they are handed to private operators.

In an earlier reference to Murramarang Resort we expand by noting that the original lease was taken-up by a NPWS employee who built the business and on sold it to larger players in the holiday accommodation market. Is this where we are heading, if so we reject the notion of private management of the facilities.

Similarly the full control of the North Era campground by commercial operators is not acceptable.

## **Discussion Paper No. 6**

### **PARK VALUES**

**Scenic beauty.** Agreed, but would add that the preservation of scenic views at strategic locations needs to be factored into maintenance plans. For example, the views from both Governor Game Lookout and Bungoona Lookout are now threatened by tall trees and a rational plan needs to be put in place to correct this situation.

**Ecological Diversity,** It is noted that *grasslands* are not mentioned, and the preservation of these shrinking areas all along the NSW coastline, must also be included in the Royal areas PoM.

**Connected Natural Systems** Agreed, but how far are you prepared to go to ensure that the proposed "New" F6 extension does not happen.

**A place with significant geodiversity:** These must be protected from high intensity fire events.

Careful consideration should be given to encouraging higher visitation to sensitive areas, such as Palona Cave.

**Water** Agreed, continue to fund and support water quality testing within the Royal areas.

**Scientific understanding.** Continue to provide support for such endeavours.

### **Historic Heritage Values**

#### **Built Heritage**

On a positive note, what have you preserved or replaced in the life of the current PoM?

- The Audley dancehall was upgraded.
- Lady Carrington Drive culvert were repaired.
- Cottage at Audley, (Post Office was renovated),
- Cottages at Reids Flat, Hill Top and Weemalah were renovated,
- Garie Beach Multi-purpose Centre was constructed (Now in urgent need of maintenance).
- Extensive Sea-wall repairs were undertaken at Pool Flat.
- A viewing Platform was installed at the Jibbon engraving site and an interpretation area was constructed nearby.
- Middens at North Era and Garie were fenced by the cabin communities and subsequently declared Aboriginal Resting Places after the repatriation of remains to both sites.

NPWS appears to have fulfilled its obligations to these structures.

On a Negative note, what has been Lost?

- The c1915 Federation style house at Loftus was demolished.
- The c1953 YHA building at Middle Rill at Garie Beach was accidentally destroyed by fire in 2010 and not rebuilt.
- The c1930's Soldier Settlement house at Garawarra Farm was demolished in 2004.
- The historic Boatshed at Warumbul was allowed to be pushed-over (destroyed by neglect) by an encroaching fig-tree in 2014.
- Cabins were demolished by neglect at South Era (2), Burning Palms (3) and Bulgo (2)
- Sea-walls at Warumbul and Simpsons areas have collapsed and have not been repaired.
- Middens at Jibbon Beach continue to be eroded by tracks made by persons accessing the hind dune areas.

The losses are to be deplored, if the same amount of losses were to occur over a similar period of the next PoM, we might well ask what will be left?

#### **Managing Visitor Destinations.**

##### COASTAL:

**WATTAMOLLA:** is acknowledged as one of the most scenic destinations of the Park, its carpark currently has a capacity for approximately 370 cars, and a proposal under the Draft Wattamolla Master Plan seeks to increase this capacity, in 2 stages, to 700 places. The Draft

document states that this number of car places was the result of research to determine the optimum visitor number for the precinct and we support well researched and rational findings. It is perhaps also worthy of note that in recent years, parking along the edge of the access road, near Wattamolla, was prohibited, with the loss of over 100 places during peak times, no doubt for sound safety reasons, but also exacerbating the current traffic problems at peak demand times.

It appears that the carpark, in its current form, was built in 1965, (s: *History of the Royal National Park, J Carrick, p98.*), before the area came under the control of NPWS, and when Sydney's population, (2.5 Million), was half of its current figure (5 Million).

The road to Wattamolla was designated as a NSW Tourist Road on [14 December 1962](#).

In addition to visitors to the Wattamolla picnic area and beach precincts, it is likely that the Coast Track upgrade will result in a higher demand for car spaces at Wattamolla as people seek to use the destination as a starting point for coast walks to the north or south.

**GARIE:** Garie carpark had been refurbished around 1969 and then had a capacity of approximately 330 cars. In 2005 an "Upgrade" of the precinct was undertaken and the carpark was downsized to 178 cars (and 2 buses), a massive loss of 150 places. Is it any wonder that the current carpark quickly fills in times of high demand? It is noted that the Heliport area on the top of the south Garie Head has been designated as an overflow carpark.

**OPINION** We believe that the high demand, beachside destinations, offer recreational opportunities that have a low impact on the *Natural Assets* of the Park and that people who step out of a car, walk across a carpark, and step onto a beach, represent the lowest impact visitors to the Royal. The revenue from high numbers of visitation to these areas, (if it is captured, and it is often not), should assist to fund the demand for higher maintenance at other areas. (it is perhaps unfortunate that during the time of the current Plan of Management, around 250 car parking places have been removed from the two main beachside destinations, approximately 100 places on Wattamolla Road and 150 at Garie, due to the Garie carpark "Upgrade").

The entry and exits to the Heliport carpark at Garie needs to be redesigned and properly signposted to meet appropriate safety requirements as we feel that the current arrangement is sub-standard. A suitable, sustainable, access track is to be constructed from the Heliport to the beach.

**JIBBON BEACH:** This precinct is accessed by Bundeena residents, ferry passengers, motorists and by the boating fraternity. It is subjected to high visitation rates during holidays and fine weekends. There are no public toilets in the area and people accessing the hind dunes to answer calls to nature are degrading the fragile environment there.

**OPINION:** Review the toilet situation here as a matter of importance and consider the re-erection of 250m of the western end protective fencing (erected around 2003) that has been damaged by storms and high tides during 2015 and in June 2016.

Install a mains fed drinking-water tap near the western end of Jibbon beach

#### **ABORIGINAL ENGRAVING SITE, JIBBON.**

**OPINION:** Review the deteriorating aesthetics of this locality and institute a management plan for the site. Particular attention is drawn to the re-sprouting *Leptospermum laevigatum* species and other plants in the depressions of the rock platform and consideration is to be given to the careful removal of such plants to ensure that overgrown and sub-soil archaeology remains intact.

**COAST TRACK, NORTH ERA CAMP GROUND:** North Era has long been an overnight destination for Coast Track walkers or others who simply trek in and out from Garawarra Farm or Garie. Current claims state that it is difficult to service the toilets there due to the remote location. Given the regrettable state of the majority of vehicle accessible toilets within the Park, due, in the main, to lack of maintenance, the claim that the North Era site is difficult to service as a justification for its closure is a moot point. North Era is currently the only recognised campsite on the Coast Track, however, unauthorised camping flourishes at many locations along the route.

Regarding the two current twin Rotaloo toilets at Nth Era. It is our opinion that they were never correctly installed and, as such, were destined to fail.

The Rotaloo's have small solar panels to charge the exhaust fan battery but the panels are located in the shadow of the fan stack, and the door locks were so flimsy that they fell-off relatively soon of commissioning. There is something seriously wrong with these installations for when a seat is lifted, the blast of putrid air from below stings the eyes and the stench of ammonia permeates the clothes for hours.

At Garie, it is also noted that the YHA building at Middle Rill at was destroyed by fire in December 2010 and not rebuilt. Another loss of a destination for trekkers.

From a historical perspective, in 1974 the authorised coastal camp sites at Burning Palms and Little Marley were also closed, at that time, "*for a year*", but they were not reopened.

**OPINION:** Opinions vary within FoR in regard to the future of North Era, some say shut it down and others say keep it. A survey of the people who use the area would be appropriate.

#### **COAST TRACK, JIBBON HEADLAND TO THE BALCONIES**

**OPINION:** Ensure that the coast track from Jibbon Headland to The Balconies is restored as part of the near future Coast Track upgrade program.

#### **COAST TRACK, BUNDEENA TO OTFORD**

**OPINION:** Well done to date, continue the upgrade to the planned schedule and resource and institute a Maintenance Plan.

Review parking areas at key access points to the Coast Track from side tracks and trails along the major roads.

- The introduction notes that the coastal precincts in particular are increasingly overcrowded. However, the discussion paper doesn't offer any real options for attracting visitors to areas away from the coast.

## INLAND

**AUDLEY:** Amongst others, the Audley precinct of today is perhaps a classic example of crowd management by *Dystopia*.

What should be a shining example of a world class National Park visitor destination is in fact a neglected and run-down mess that would not be out of place in a third world country.

**OPINION:** Visit the area and see for yourself. Alternatively, as mentioned above, FoR would be pleased to conduct a tour for interested parties.

**TRACK-HEADS:** The Royal areas offer many walks to groups and individuals with widely diverse ranges of interests, be they to examine flora, birdlife, waterways or just for exercise in a bush environment.

*In late 2015 to mid 2016, a FoR sub-committee surveyed 45 roadside carparks within the RNP for condition, safety and signage. Of these, 10 sites were selected by the committee for priority actions and the final report was submitted to the then Royal NP Area Manager on 20 June, 2016.*

*Aside from the planned Roads and Maritime Services work at the Curra Moors track head in July 2016, NONE of the recommended actions have been undertaken.*

**OPINION:** Small, safe roadside carparks with appropriate signage to service the trails would not appear to be unreasonable. See Curra Moors track carpark as an example

It is noted that at Garawarra Farm, the parking area has been extended to meet the relatively recent demand for parking for access to Figure Eight Pool. 2 X 2 bays of 100m now provide for an estimated additional 130 cars.

### **TRACKS WITHIN THE PARK**

**OPINION:** Resource, repair and maintain eroded and poorly sign-posted tracks within the Park. Consider the acquisition of the necessary purpose-built machinery to achieve this goal.

This may seem to be an over-simplified statement, however, failure to repair and maintain tracks will result in more accidents, degradation tracks and streams from siltation and a loss of amenity to visitors.

**CLOSED PARKING AREAS:** The following former parking areas are now closed, some for a number of years:—

Karingal Picnic area at Lilyvale ; The southern end of Red Cedar Flat, the number of car spaces at each of these locations have not been surveyed to date.

Chrystal Pools parking area, near Flat Rock Creek, had 8 car spaces but has now been closed for a number of years. It is acknowledged that safe access from the road turn-in / exit was a concern, none-the-less another 8 spaces lost.

Here we see another example of more lost car parking spaces and we are then told that the park is being overcrowded

### **FIRE**

An observation here, whilst some might congratulate NPWS on Environmental and Hazard Reduction Burns in a number of areas in the Park, it could be observed that at an average rate of around 200ha burnt in the Royal, each year, over the last 5 years, that it will take around 40 years to cover the Park, not counting the no-burn (80 – 100yr) Rainforest areas. It is not enough.

Go back to the photo of Wattamolla, on the cover of Paper No 2, and envisage what would happen if a fire was to start on a hot day on the Wattamolla road. Unless helicopters were standing-by to immediately douse the fire it could develop into a devastating fire with a massive loss of life because the people at Wattamolla have nowhere to go.

### **Pests**

We would like to see more resources allocated to Pest control, particularly Foxes, and a reduction in the number of Feral Deer.

Thank You again for the Opportunity to comment on the discussion Papers

Yours Sincerely

John Arney

President,

Friends of Royal