



24 August 2017

Comments on Discussion Papers re Plans of Management for Royal and Heathcote NPs and Garawarra SCA

1. Protecting Park Values

The paramount consideration should be protection of the natural values of the reserves. Protection of these values is the reason the reserves were established and it is required under the National Parks and Wildlife Act requires. The two National Parks in particular, should be managed first and foremost for their natural values.

Apart from an attractive photo of two Swamp Wallabies on the cover, there is very little reference to these values in this discussion paper. We assume the draft plans of management will contain a much greater depth of information and refer to the extensive body of reports and atlas data that document the natural values.

The focus should be on protection of entire plant communities and overall biodiversity, not specific species. Concentration of limited resources on threatened species - Saving our Species (SoS) - results in neglect of a vast range of other species. These remaining species make up the biodiversity of an area and contribute to its stability and resilience; many of them will slide towards threatened status without appropriate protection.

An example of the short-sightedness of the SoS approach is the acknowledgement in the discussion paper that “Pest control programs therefore focus on protecting the threatened native plants and animals most at risk”. Oatley Flora and Fauna wrote to the Minister for the Environment in 2014 about this very issue in relation to fox control and lyrebirds (not listed as threatened but a significant and much-loved bird in Royal NP) [letter attached]

We commend “an adaptive management approach that allows emerging knowledge and experience to inform management practices.”

2. Visitor Destinations

Even though these reserves are adjacent to the huge population of Sydney, increasing demand for their recreational use is not an excuse to sacrifice the protection of natural and cultural features of the reserves. Limits on visitor numbers at sites need to be set and enforced.

A booking system could be employed for popular sites in peak periods and visitors informed well in advance, that sites will be closed when full and gates closed on access roads. It is not unreasonable to expect visitors to plan ahead and book early.

We do not support the development of new visitor precincts, especially if it involves the clearing of native vegetation. (We oppose the establishment of a so-called ‘ecolodge’ at Spring Gully on the edge of Royal NP). Nor do we support the development of additional car parks or the expansion of existing car parks or large bus turn around areas in the reserves. Mini buses could be employed. The natural values of the reserves will be better experienced and appreciated by smaller groups.

We support the phasing out of powerboat and jet ski launching at Bonnie Vale. We have seen the destruction of the nest of an Eastern Osprey (a vulnerable species in NSW) in Georges River due to wanton and dangerous use of jet skis.

At Wattamolla and Garie we don't support expanding car parking areas or permitting car-based camping at these sites. Only walk-in camping should be permitted. We do support the re-development of some of the Garie Surf Club to accommodate walkers.

At Audley we do not support the construction of a walking and cycling bridge over Kangaroo Creek.

3. Recreational Activities

Royal and Heathcote National Parks are not sportsgrounds or theme parks. There are numerous facilities in other parts of Sydney, and other bushland destinations beyond the city, to cater for people who wish to undertake organised sports or adventure sports. Not all recreational activities are appropriate for a national park and for these particular reserves.

Recreational activities in the reserves should primarily promote an understanding and appreciation of their natural values. Guided walks are one activity that introduces visitors from highly urban environments to sensitive and safe exploration of natural areas. They are an excellent opportunity to educate and entertain visitors, and reduce misuse of the reserves.

Activities that degrade the environment, harm wildlife, or interfere with the quiet enjoyment of other reserve users should not be permitted. Partnerships with commercial operators should be permitted only where they promote the appreciation and understanding of the natural and cultural values of the reserves. None should be undertaken that result in financial costs for the Service (eg repairs or the employment of security staff).

No new walking tracks should be considered; they would further fragment the vegetation, contribute to edge effects and provide access routes for feral predators. Existing walking tracks need to be brought up to reasonable standards.

We support the appointment of an on-site manager for the Bonnie Vale campground but not the construction of additional cabins or semi-permanent tents there. Plenty of accommodation is already available in Bundeena and Maianbar. We support overnight camping opportunities for walkers at Wattamolla, Garie and Garawarra Farm, provided they are not exclusive to commercial groups.

We oppose horse-riding in any of the reserves. There are opportunities elsewhere for this activity.

Drones should not be allowed anywhere in the reserves except for park management purposes.

We do not support catering for large groups (in excess of 40) either private or commercial, and we do not support the running of competitive sporting events.

4. Commercial Activities

Commercial activities permitted in the reserves should be primarily to increase appreciation and understanding of their natural and cultural values.

All fees obtained from leases, licences or consents should be ploughed back into the reserves, to be used in programs to protect natural and cultural values.

5. Mountain Biking

No new mountain bike tracks should be made in the reserves, and existing tracks that are causing erosion or damaging natural features, should be closed. Other venues and tenures of land can provide for these activities in the region.

It is curious that the NSW Government should consider the necessity to provide extensive opportunities for mountain bike activities in natural reserves while reducing opportunities for commuter cycling in the city, where it poses no harm to the environment.

The discussion paper on mountain biking notes that relic shale and ironstone soils on the western side of the Royal NP (especially between Heathcote and Loftus) are considered more resistant to erosion and other adverse environmental impacts than the soils on the coastal side. However they support plant communities listed as Endangered Ecological Communities under the NSW Threatened Species Conservation Act 1995 and several rare and threatened plant species. Any assessment of mountain bike activities in these areas needs to take into account the potential for damage to these communities and species and the environment in general. Soil type alone is not sufficient justification for preferring this side of the park.

Speed limits should be put on mountain bikes, especially when they will be sharing the track with other users such as walkers. We support the compulsory use of bells or other warning devices by all mountain bikers using walking tracks, and wrote on this subject to the Area Manager of Royal NP in 2015 [letter attached]

Attached documents:

1. Letter from OFF re fox-baiting in Royal
2. Letter from OFF re use of 'bear bells' by mountain bike riders



Elizabeth Cameron

Secretary

Oatley Flora & Fauna Conservation Society