

Bushwalking NSW

Bushwalking NSW Inc. PO Box 3008, Uki NSW 2484 O: L1, 79 Myrtle Street, Chippendale P: (02)8003 5545

E: admin@bushwalkingnsw.org.au W: bushwalkingnsw.org.au  [bushwalkingnsw](https://www.facebook.com/bushwalkingnsw)  [@BushwalkingNSW](https://twitter.com/BushwalkingNSW)

SUBMISSION BY BUSHWALKING NSW INC -DRAFT PLAN OF MANAGEMENT - ROYAL NATIONAL PARK, HEATHCOTE NATIONAL PARK AND GARAWARRA STATE CONSERVATION AREA

Introduction

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from nearly 70 bushwalking clubs throughout the state, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

In preparing this submission, Bushwalking NSW has reviewed the following documents released at the same time:

- Draft Plan of Management - Royal National Park, Heathcote National Park and Garawarra State Conservation Area
- Draft Planning Considerations - Royal National Park, Heathcote National Park and Garawarra State Conservation Area
- Draft Mountain Biking Plan - Royal National Park, Heathcote National Park and Garawarra State Conservation Area

Bushwalking NSW has also been informed by comments and suggestions by representatives of our member organisations and other affiliates. We have specifically included material sent to us by other organisations and individuals. Where we have done so, acknowledgement of the source of this material has been made.

While our submission has a focus on bushwalking, we recognise that our member organisations undertake other recreational activities such as mountain biking, kayaking and rogaining. Where these are relevant, we made comment on other activities. As bushwalkers we also have a strong connection to environment and have made comment on environmental issues where this is warranted.

To make it easier to review, our submission generally follows the order of topics presented in the draft Plan of Management.

Providing for visitor use and enjoyment

While we generally support the Visitor Management Zones and the management principles that underpin them, we consider that some amendments to the zones are warranted.

Visitor management zones

Zone 1 Nature-recreation envisages walking tracks, walk-in camping areas and basic visitor facilities. This is supported. However, it is a reality that some bushwalking within this zone will be 'off-track' i.e. following a route that has no formal track. This type of bushwalking is undertaken by more experienced walkers with bush navigation experience. The walking parties are small.

Bushwalking NSW is committed to the principles of Minimal Impact Bushwalking through the Bushwalker's Code of Conduct – refer to <https://www.bushwalkingnsw.org.au/bushwalkers-code/>

While most bushwalkers will continue to use track-based walking, both Royal and Heathcote offer opportunities for exploration of more remote parts of the parks by infrequent, small groups. By practising Minimal Impact Bushwalking, we consider that this type of recreation is sustainable, particularly if it is confined to day walks only.

Camping and other accommodation

We support the intention to investigate additional sites for walk-in camping. We also acknowledge that the two sites proposed for closure (North Era and Lake Eckersley) are showing evidence of 'over-use' and are difficult sites to maintain. However, we do have concerns about the spacing of campgrounds and the apparent exclusion of public tent sites from the proposed Wattamolla campground.

Spacing of Proposed Campgrounds

The comments below acknowledge the input of one of our member organisations: The Walking Volunteers.

While we support the proposed new walking track between the Winifred Falls Track on Maianbar Road and the Marley Track on Bundeena Drive, there is concern that the spacing of proposed imap://eo%40bushwalkingnsw%2Eorg%2Eau@bushwalkingnsw.org.au:993/fetch%3EUID%3E.INBOX%3E17791campgrounds is not ideal for many bushwalkers.

The proposed walk-in camp site at Mowlee Ridge is only 6.6 kilometres from Bundeena Wharf and 4.6 kilometres from the Coast Walk gate on Beachcomber Avenue at Bundeena whereas the Wattamolla camp site is 10.7 kilometres from Bundeena Wharf. However, all the tent sites at this camp are proposed for private use only. The camp site at Garie which will have some (unspecified in the draft Plan) public tent sites is 12.6 kilometres from the Mowlee Ridge and 9.8 kilometres (including the climb up Werong Point) to Otford Station.

Experience elsewhere suggests that the ideal spacing between campgrounds in hilly or undulating terrain is 15 kilometres for adults and 8-10 kilometres for family groups with children.

Based on the campground locations proposed in the draft Plan, a family group is faced with a three-day walk: Bundeena Wharf – Mowlee Ridge 6.6 kilometres, Mowlee Ridge - Garie 13 kilometres and Garie - Otford Station 9.8 kilometres. If the proposed Wattamolla campground was also available to all bushwalkers (not just those with private or commercial groups), then the distances would be more feasible for family groups: Bundeena - Wattamolla 10.6 kilometres, Wattamolla - Garie 8.1 kilometres, Garie - Otford Station 9.8 kilometres.

In relation to a group of adults, the spacing of campgrounds between Bundeena and Otford is 18.7 kilometres between Bundeena Wharf and Garie (first day) and 9.8 kilometres between Garie and Otford Station (second day).

Because of these lopsided distances, we would support the establishment of an additional walk-in campground at Curracarong. This would provide a more evenly spaced network of campgrounds. It could also be easily serviced and maintained using the Curracarong Fire Trail off the Wattamolla Road.

We also support the expansion of the proposed Red Cedar Flat campground to include a small area for walk-in campers. This is proposed in the context of a proposed new 70 kilometres circuit walk in Royal which is outlined in more detail below.

Bushwalking

We propose the establishment of a new 70 kilometres circuit track in Royal. This has been



proposed by James McCormack (Editor, Wild Magazine) who has long experience in bushwalking in Royal and has consented to its inclusion here. The proposed route has a number of features:

- 4-5 day walking experience which passes through a number of different landscape types in the park including the spectacular coast and the lesser visited interior of the park.

- Integrates with the Royal Coast Track.
- Circuit walk which can be accessed by public transport. Long-distance circuit walks are rare in the Sydney Region.
- Utilises the proposed campgrounds in the draft Plan. The spacing of campgrounds would be feasible if the proposed Red Cedar Flat campground also included capacity for walk-in campers.
- For roughly 68km of the 70km of the loop, the primary cost—aside from campsite creation—would simply be signage and some minor clearing of vegetation. The Karingal Track/Red Cedar Loop, for instance, has fallen into disuse, and despite being slightly overgrown is nonetheless passable. So too is the Lilyvale Track. Likewise sections of Bola Ridge. This would require minimal effort to bring them to an acceptable track standard.
- Proposed campsites would be:
 - 9.8km: Mowlee Ridge/Marley (potential – proposed in Draft POM)
 - 13.8km: Wattamolla (potential – proposed in Draft POM) or Curracarong (proposed in this submission)
 - 21.8km: Garie (potential – proposed in Draft POM)
 - 31.7km: Red Cedar Flat (potential – proposed in Draft POM)
 - 34.7km: Garawarra (potential – not proposed in Draft POM)
 - 51.1km: Uloola (Existing)
 - 60.0km: Winnifred Falls (potential – proposed in Draft POM)

Bushwalking NSW Inc recommends that this proposed circuit walk be considered by NPWS as an addition to the walking track network.

Cycling and Mountain Biking

The proposed network of mountain bike tracks in Zone 2 seems an appropriate response to increasing demand for mountain biking routes. However, there is a need to seek clarification of a statement in the draft Mountain Biking Plan concerning bike access along the Uloola Trail to a “camping area” (presumably Uloola Falls) - see page 9. This states that this is popular with mountain bikers.

However, this route is not supported in the draft Bike Plan. Though not stated it implies that NPWS will prevent bike riders accessing the Uloola Falls Trail to the Falls. What measures will NPWS therefore take in relation to restricting the Uloola Trail to walkers and management vehicles only?

Other Recreational Activities

Should additional mooring facilities be considered in South West Arm Creek, the potential impacts on kayaking access to the creek should be considered.

Climate Change and Outdoor Recreation

Although climate change impacts in relation to biodiversity and infrastructure are mentioned in both the Discussion Paper and the draft Plan, there appears to be no mention to the future impacts of climate change on outdoor recreation. This is a significant omission as climate change can be expected

to impact how we recreate outdoors. This can be expected to manifest itself in both the short-term emergency context that was experienced over the 2019-2020 summer as well as the more incremental effects of rising temperatures and sea levels.

One outcome of climate change will be increasing number of days in which outdoor recreation such as bushwalking will need to be restricted due to heatwaves, bushfires and hazardous air quality (such as arises from bushfires including hazard reduction bushfires). In addition, tracks may need to be closed or rerouted due to erosion from storm events or flooding and the longer-term effects of rising sea levels.

It can be expected that the number of days the park or sections of the park need to be closed or access restricted due to weather or fire events will increase. This will require an effective and efficient park alerts system to inform intending park users of closures or access restrictions.

The use of the NPWS website and app to provide park alerts should continue. However, improvements can be made in the timing and manner of alerts on the website and app and in communicating changes to park users. NPWS should also explore the option of direct notification of alerts to registered park users via their smart phones.

There was a case in early 2021 where sections of Royal were closed at short notice due to flood and storm damage and then this advice was rescinded a few days later. This was confusing to park users and suggested the earlier alert was excessive.

Educational activities and scientific research

There are opportunities to utilise volunteers from the outdoor recreation community in education and scientific research.

Group and commercial visitor activities

We remain concerned about the potential for creeping commercialisation of localities and activities to impede the ability of the non-commercial sector to enjoy the park.

Any expansion of the commercial tourism sector in the parks should not result in access to tracks or camping areas by the non-commercial recreation sector being excluded or restricted. For example, we would oppose any development of a camping ground at Wattamolla which excludes independent or non-commercial campers and walkers.

We also consider that allowing walking groups of up to 39 participants using the park without a consent is too high a threshold. This point is also picked up below (see comment on Park use regulations).

Non-park infrastructure and services

We consider that a coalmining lease affecting part of Garawarra State Conservation Area is no longer appropriate. NPWS should seek to have this lease either terminated or no longer renewed when it reaches its expiry date.

Scheme of operations

The absence of any reference to the bushwalking community is noted. It is recommended that an additional action be added to 'Providing for visitor use and enjoyment': *work with bushwalking groups to plan, implement and maintain the network of walking tracks*. This should be ranked as a High priority. In particular, we would welcome bushwalker involvement in assessing the viability of and planning for the proposed 70 kilometres circuit walk in Royal.

Park use regulations

Recreational activities

The current NPWS limit on the size of walking parties in National Parks such as Royal, Ku-ring-gai Chase and Blue Mountains that do not require prior consent is set at 20. The draft Plan of Management appears to change this limit to 40.

This would mean that walking groups can number up to 39 participants without the need for a formal consent. We consider that this threshold is too high and it should be reduced to 30. This would reduce the impacts of large walking parties on tracks and vegetation.

Submission prepared by the Management Committee of Bushwalking NSW Inc.

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Enquiries to conservation@bushwalkingnsw.org.au