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PLAN OF MANAGEMENT AMENDMENT - ILLAWARRA **ESCARPMENT 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 70 bushwalking clubs throughout NSW and the ACT, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

The Illawarra Escarpment State Conservation Area is visited by a number of our affiliated clubs, particularly those based in Sydney and the Illawarra.

Proposed establishment of a campground, near Maddens Plains, as part of the Great Southern Walk

Bushwalking NSW Inc supports, in principle, the establishment of the Great Southern Walk as it would enhance walking opportunities and provide a 'walking link' between Southern Sydney and the Illawarra. We also recognise that any multi-day walk must include campground facilities to support walkers 'overnighting'.

However, we do have a number of concerns about the proposed Maddens Plains campground and consider that progression of this proposal must be subject to the following conditions:

- 1. The location of the proposed campground should have a minimal ecological footprint, preferably on land already disturbed and with existing vehicle access.
- 2. Our preference is that the built accommodation is located outside NPWS Estate and that NPWS should work with the local council and other relevant organisations to investigate off-park locations.
- 3. If the proposed huts are built on NPWS Estate, they should be constructed and managed by the NPWS. We oppose commercial hut development on NPWS Estate (including huts leased exclusively to a commercial operator).
- 4. Proposed walkers' huts and associated structures should be modest in scale.
- 5. Provision should be made for walkers who prefer to camp in their own tents.
- 6. While we have no objection to the huts being used by commercial group trips, management of hut bookings should preclude exclusive block bookings by commercial operators which prevent use of the huts by individuals or non-commercial groups for extended periods of time.
- 7. Fees to use the huts and/or camping area for tents should be modest and accessible to independent walkers on a limited budget.

Enhanced rock-climbing opportunities

We have no objection to additional rock-climbing areas. Our current policy on natural areas states that, except for declared wilderness areas, rock climbing is acceptable provided that new permanent anchorages are installed only by those authorised to do so. It is noted that under the proposed amendment, new bolts or anchors will not be installed.

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Great Southern Walk

It is noted that the proposed Maddens Plain campground is to be constructed to support the Great Southern Walk. Previous submissions to the draft Plan of Management for the Royal National Park (and adjoining parks) have drawn attention to the distances between proposed campgrounds. It is noted that the distance between the Madden Plains campground and the nearest campground to the north at Garie Beach would require a walking distance of over 18 km including two steep climbs (Burning Palms to the Cliff Walk and Stanwell Park to Stanwell South Head) for southbound walkers. Planning consideration should be given to an additional campground between Burning Palms and Stanwell Park.

In addition, the apparent decision to place the southern track head at the Southern Gateway Centre at Bulli Tops means that this track head will not be accessible by public transport. It also means that vehicles travelling north on the Mt Ousley or Bulli Roads cannot easily access the Centre and vehicles travelling north from the Centre have to drive 8.6kms south to the Picton Road before they can travel north on the freeway.

This decision should be reviewed and consideration should be given to relocating the southern track head further south to a more accessible location.

Thank you for the opportunity to comment on the proposed amendment. Bushwalking NSW Inc looks forward to being kept informed on the final adoption of the proposed amendment and on progress with the Great Southern Walk.

Yours sincerely,

David Bell

President

Bushwalking NSW Inc.

18 October, 2022