



Sutherland Shire Environment Centre

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November 1, 2019

Honorable Mark Speakman, MP
PO Box 125
Cronulla NSW 2230

Dear Mr Speakman.

Thank you for the opportunity to suggest land acquisitions for addition as Reserves to NSW National Parks. The following recommended additions to National Parks Estate are based on Sutherland Shire Environment Centre research, assisted by consultation with other community stakeholders, including National Parks Association of NSW.

Respected international bodies have highlighted the fact that a million terrestrial and marine species worldwide are critically threatened with extinction. Australia has the highest rate of mammal extinction in the world, and birds dominate Australia's current list of threatened and critically endangered species. Many of the threats these species face are directly linked to climate change, others to poor governance. It is beholden on governments at all levels to embrace solutions that will address these threats, ensuring natural lands are not continually cleared at the current rate (as in NSW), and that our oceans and waterways are protected. Water temperature is increasing, overfishing and other threats are compromising the biodiversity of the hidden world beneath the surface - your government can do more to protect both the terrestrial and marine environment.

It is not the first time that the local proposals below have been placed before state governments (both Liberal and Labor). Many proposals for additions to National Parks still remain unresolved. For instance, there has been little movement on Terrestrial and Marine National Park additions as enunciated in NPA's "50 Parks Proposals" shared with your government on the occasion of the 50th Anniversary of the NSW National Parks and Wildlife Service in 2017. Several of the specific local proposals we put forward (below) are contained within that list.

In the last decade or so, we in the local environment groups have found a general inertia on the part of governments to seriously address many issues that we have raised. The response to numerous letters and representations on most of the additions suggested below has been tokenistic. Periodically, local MPs such as yourself have been prepared to

advocate, often unsuccessfully, for improved outcomes for the local environment. The support you gave in 2014 for a new Sydney Marine Park and in 2018 for a Marine Sanctuary in Port Hacking advocated by Shelly Ocean Swimmers are particular examples of personal advocacy by you that gained no traction with government.

We appreciate and thank you for the offer to receive our considered proposals and to advocate them to your ministerial and cabinet colleagues. We would urge you to also remind the current Environment Minister that these largely locally generated proposals are part of a broader mandate to catch up with state-wide National Parks additions that have been largely put on hold (or abandoned) by a government which is not acting in the fullest interest of the state's natural areas.

We also ask you to communicate the urgent need to increase NPWS funding: in relation to our area specifically we have been advised that there are only 6 rangers plus one team leader to cover the whole Royal National Park, Heathcote National Park, Georges River National Park, and the Garrawarra State Conservation Area. The 6 rangers are not on duty at one time and one of these rangers is only employed half-time. On weekends and public holidays only 3 rangers are assigned to cover these park areas. Meanwhile park visitation rates have skyrocketed to more than 6 million visitors a year in the Royal National Park alone:

<https://www.theleader.com.au/story/6325821/huge-jump-in-royal-national-park-visitor-numbers/>

Adequate staff numbers are critical for effective conservation of NSW National Parks.

We have listed properties and marine areas for consideration, with a brief description of their merits. They include additions to the Royal National Park (1-3), Marine Parks (4), and other properties worthy of conservation (5-10). The NPA Marine Park submission, NPA 50 Parks document and map of proposed Jibbon Headland to Southwest Arm section are attached to provide more detail on the suggested acquisitions. We would be pleased to meet with you and provide more information, including maps, on any that are of interest.

1. Spring Gully – 5.6 hectares of pristine gully forest and wetland at Bundeena which originally belonged to the Scouts and was offered to the NPWS for acquisition in 2011. In 2013 the NPWS approved its purchase for addition to the Royal National Park. The land was instead purchased by the current owner who is proposing to clear over four hundred trees, of which at least fifty-five are significant hollow bearing trees, within known Eastern pygmy possum habitat, to construct a residential dwelling and six safari tents for twelve tourists. The NSW Office of Environment and Heritage stated “Spring Gully contains a rich mosaic of endangered ecological communities listed under the Threatened Species Conservation Act”. Professor David Keith, University of New South Wales, has advised that the proposed development, including the proposed access road upgrade through the Royal National Park, poses direct impacts to the critically endangered Eastern Suburbs Banksia Scrub EEC and indirect impacts on Bangalay Sand Forest EEC, Sydney Freshwater Wetland EEC, Swamp Sclerophyll Forest EEC, Coastal Upland Swamp EEC and Eastern Suburbs

Banksia Scrub EEC. Professor Keith describes the local occurrence of Eastern Suburbs Banksia Scrub on this land as significant.

Both the Australian National University and the University of New South Wales have raised their serious concerns over potential impacts to the adjoining Long Term Ecological Research Network site within the Royal National Park. This multi-decade research site, into which millions of dollars of public money has been invested, was established in the 1980's and has yielded important findings in relation to bushfire behaviour and long term influence of wildfire on coastal ecology.

In 2014 the Mayor of Sutherland Shire Council wrote to local members of parliament stating "The land is a logical extension to the Royal National Park". In 2016, Rob Stokes wrote to the NCC stating "Should the owner wish to sell the property I would be pleased to advocate for its purchase by Government if reasonable. I am aware of the values of the site". In September 2017 Sutherland Shire Council wrote to the RFS describing the proposed development as an "extreme bushfire danger... [that] obviously did not meet the objectives and sound planning principles of reducing the risk to life and property".

We ask that the NSW Government take urgent action to protect both this land and the adjoining Royal National Park and that the Minister for the Environment cancels the access license through the Royal National Park granted by the previous Minister noting that significant impacts from the proposed road construction work have not yet arisen.

2. Jibbon headland to South West Arm including Cabbage Tree Basin (maps attached) - the surrounding land is already within the National Parks Estate and in the case of Cabbage Tree Basin and South West Arm, it includes the seabed. However the water column is under NSW Fisheries management and the surface and boating activities fall under the jurisdiction of Roads and Maritime Services.

A marine addition to Royal National Park is recommended at Jibbon Headland to include the sub-tidal shelf from the eastern extremity of Jibbon Beach to a point south of Shelly Beach facing the Jibbon bombora. The rock features and marine interface are particularly beautiful and attract many visitors. However unsustainable harvesting is occurring below the high water mark as it is not subject to the same restrictions that apply to the inner Port Hacking.

The intertidal area in Port Hacking from the entrance to Fishermans Bay to Costens Point and the entrance to South West Arm would also benefit from being placed under National Park jurisdiction, as they are critical not only to the health of the estuary in general, but are arguably the most important feeding area for wading birds in the entire Port Hacking. This area is under threat by, among other things, boat damage to the seagrasses, trampling, and domestic pet dogs. This area would conjoin with a Northern extension to South West Arm. As with the surface area of

South West Arm, the management of this area should be the same as for Cabbage Tree Basin.

The importance of the flora and fauna and Aboriginal history (including archeological sites) of this area has been scientifically assessed as significant. Consequently, Sutherland Shire Council's management plans for Port Hacking and the Sydney Coastal Councils group have supported the exclusion of powered craft. The public's appreciation of the special nature of the Basin has been highlighted by Sutherland Council's recent community consultation and submission to NSW State Government asking for motor boating-free zones in Cabbage Tree Basin to be implemented to protect sea-grass and endangered, migratory seabirds. We note that the Pied oystercatchers breeding on Deeban Spit adjacent to the channel leading to Cabbage Tree Basin are listed as an endangered species. It is estimated there are fewer than 200 breeding pairs across the whole of New South Wales:

<https://www.environment.nsw.gov.au/threatenedspeciesapp/profile.aspx?id=10386>

The addition of this area to the Royal National Park would require a commitment on the part of the State government to maintain the extant Sutherland Shire Council programs which support the volunteers who monitor these birds and educate the public about the need to protect them. A marine addition to Royal National Park, as at Boudi National park would assist in affording it the protection it deserves by placing management under the one conservation-oriented Authority.

Both the SSEC and NPA have written to the new CEO of RMS asking that the Basin be declared a quiet zone with no motorised craft allowed. Despite lodging this several months ago, we have received no response. We would greatly appreciate it if you could follow up on this. Our understanding is that this could be implemented prior to any final decision on the future tenure of the Cabbage Tree basin.

3. Excised lands at Loftus, Grays Point and Heathcote ovals should be returned to National Parks Estate to enhance conservation of the National Park surrounding them. For example, NPWS needs to have oversight of potential developments on these lands to ensure there is protection for the adjoining National Park from downstream impacts.

4. Sydney Marine National Park Proposals:

The following (mainly sanctuary) proposals are part of a broader proposal by NPA* (attached), supported in several instances by Sutherland Environment Center and Shelly Ocean Swimmers. Description of the seven listed proposed sanctuary sites along with extensive references can be found in the attached Marine Park Proposal. The numbers in parentheses correspond to the sanctuary descriptions in the attached proposal.

Royal National Park Sanctuary (23)

Hungry Point Sanctuary (21b)

Shark Island Sanctuary (21c)

Jibbon Sanctuary (21d)
Boat Harbour Sanctuary (19)
Kamay Sanctuary (17a)**
Towra Point Sanctuary (18)**

*The extensive references provided in the attached NPA Marine Park submission support arguably, one of the most comprehensive responses to the government's explicit, but regrettably, quite tokenistic proposals for 2.4% of greater Sydney's marine waters between the Central Coast and Shellharbour to be gazetted as fully protected sanctuaries. (International and scientific targets vary from 10-30%).

**The preservation of the Towra Point Reserve and spectacular marine and intertidal zones along Kamay National Park are being threatened by the recent proposal for a cruise-ship terminal at Yarra Bay. We ask you to ensure that this damaging proposal is rejected.

As a Local Member for Cronulla, the most valuable role you could play in government is to reignite the interest of your fellow MP's and cabinet members in continuing with the process that should have led to the NSW government gazetting a Sydney Marine Park. This process was halted due to the intervention of your former fisheries minister Niall Blair, ensuring that recreational fishers would not have to accept ANY new sanctuaries in the Sydney marine bioregion. Gaining commitment to seeing through the process would be the easiest way to begin making good the shameful abuse of governance that shut down this process.

5. Woronora Catchment - designation as a nature reserve would help preserve the important habitats, such as endangered hanging (coastal upland) swamps that are vitally important for filtering and maintaining our water supply. There is increasing recognition from the public that mining in all water catchment areas should be banned due to water losses and river bed impacts and the inclusion of these special areas into the National Parks Estate would assist with this goal.
6. 50 Otford Road - a section of wet sclerophyll/closed forest is for sale for ~\$1 million. It doesn't adjoin the Royal NP but has important ecological value in providing wildlife corridor linkages between Royal National Park, Garawarra State Conservation Area and the Illawarra Escarpment State Conservation Area and catchment of the Hacking River. Species such as the greater glider which is effectively extinct in Royal National Park after the disastrous 1994 fires, may well depend on recolonisation from the Southern moist forests. Also linkages south need to be maintained to enable species migration as average temperatures increase due to climate change.
7. Kurnell Peninsula - opportunities for the addition of unreserved crown land and privately owned land to Towra Point or Kamay-Botany Bay National Park could be investigated.

8. Woronora River - there are multiple sections that could be acquired to form a Woronora River Regional park.
9. Menai West - land belonging to the local Aboriginal land council could be acquired and added to the Georges River National park, if the land council is amenable.
10. Crown land at Garrawara hospital - this land is somewhat degraded and below power lines but deserves protection by addition to Garawarra State Conservation Area as it is within the Hacking River catchment and threats from future housing or industry development need to be annulled.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tassia', followed by a vertical line.

Tassia Kolesnikow
Chair, Sutherland Shire Environment Centre
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