



Sutherland Shire Environment Centre

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Submission – part 3

In response to the draft Plan of Management for the Royal National Park, Heathcote National Park, and Garawarra State Conservation Area Table 6 Scheme of operations

Outcome	Actions	Priority	SSEC Priority	SSEC Response
Protecting the natural environment				
1. There is increased protection of the range of park values	a. Manage the parks in line with visitor management zoning (Figure 3).	Very high	Very high	<p>Disagree - SSEC supports the concept of visitor management zones 1 and 3. We do not support the current zone 2 areas, which appear to be land largely given over as “Designated mountain bike areas.”</p> <p>A number of endangered ecological communities exist in zone 2 areas, but information about these threatened species and communities has NOT been made available to the public in the draft plan of management, or the extent to which they overlap with mountain bike trails. Please see additional points made in our extended submission particularly in relation to mountain bikes (pp.3-4, pp.12-28).</p> <p>Mountain bikes have already caused significant habitat destruction in these areas, much of which has taken place out of view of the general public. It is not sufficient to qualify that works in these zones will be subject to “environmental assessment and approval”. The “visitor experiences” suggested for these zones is not in keeping with “sustainable visitor use” or the need to maintain the ecological integrity and biodiversity of the park as required by the NPW Act.</p> <p>Zone 2 appears to give over large areas of national park to ongoing abuse by one user group. Mountain bikes</p>

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				tracks are narrow – an entire zone does not need to be designated if the intention is to keep riders on approved tracks. Unauthorised mountain bike trails must be removed and remediated as a management priority.
	b. Support research organisations and individuals to undertake research relevant to the understanding and conservation of park values and other research that will assist park management.	Medium	High	<p>Agree but change to High priority - with the provision that this must not stand in as a replacement for vital field research and analysis on the part of NPWS staff.</p> <p>There is a relative dearth of research on the ecology of the Royal, Heathcote, and Garrawarra. Goldingay notes “there is growing recognition that there must be a focus on measuring the ecological effectiveness or performance of reserves... A key element to achieve ecological effectiveness is the extent to which ecological research is being used and encouraged to improve reserve management.” (2012, p.B12)</p> <p>We submit that priority should be given to creating a publicly accessible database of research on the Royal National Park and surrounding Sutherland Shire and Illawarra bio-region.</p> <p>Partnerships with organisations such as the Linnean Society, and university research centres should be fostered. A network of researchers who study the ecology of the Sutherland Shire and Illawarra region should be developed. Projects should be identified and research grants allocated to suitably qualified recipients, including higher degree research students and early career researchers, conditional on the production of reports. Ref. also these points in Table 6: 5.c</p> <p>Volunteer naturalists and academics should not be used to compensate for inadequate NPWS funding.</p> <p>It is our understanding that rangers are employed for their expertise in managing the natural heritage of the park, carrying out natural resource surveys, preparing</p>

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				environmental assessments and other statutory responsibilities. It is not clear whether the rangers in this area have sufficient time to carry out these duties given their other responsibilities for managing the huge increase in visitation.
2. The geological values and landform features of the park are protected	a. Maintain and upgrade existing tracks, including installing boardwalks in fragile environments, to minimise impacts on park values.	Very high	High	<p>Agree - this work should not be outsourced to companies such as DirtArt which specialise in building mountain bike tracks and who do not prioritise the need to protect and conserve habitat.</p> <p>Better educational signage is needed to educate and inform about ecology and park values. More signs about no dogs / no mountain bikes / littering are required in areas which are problem zones, including clear and explicit signage to indicate closed tracks. List fines for illegal / unauthorised activity that causes damage to tracks should be shown on signage.</p> <p>Please refer to pp.3-7, 12-28 in the longer submission for issues relating to signage, photos of damage to tracks and signage.</p> <p>Better weed management is needed alongside tracks.</p> <p>The Flat Rock Creek parking area upgrade is an excellent model of successful enhancements to a small visitor entry parking zone.</p>
	b. No new tracks will be constructed in Zone 1, except realignments to protect park values and short connecting tracks (including those identified in Figure 2).	Very high	Very high	<p>Agree - noting the lack of compliance on the part of the mountain bike community and the failure of NPWS to police this effectively. See pp.12-28 in our longer submission for additional discussion re this matter, and images.</p> <p>Closing and remediating unauthorised tracks must be a priority. NPWS must demonstrate it can manage and police compliance.</p>

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3. The health of aquatic ecosystems in the parks is improved	a. Prepare and implement a management strategy for Cabbage Tree Basin, and other aquatic ecosystems at risk.	High	Very high	<p>Agree but Very high priority. Boats, jetskis and commercial nipper pumping should be banned in Cabbage Tree Basin.</p> <p>Active steps should be taken to protect / support endangered shorebirds including the addition of educational signage similar to those along the shore bird reserve at Woollooware Shores.</p> <p>Please see pp.29-41 in our longer submission regarding the management of Cabbage Tree Basin, a potential seawall at BonnieVale, suggested Port Hacking additions, as well as the risk associated with Camp Gully Creek and the Hacking River due to pollution from the Metropolitan Colliery, and lack of remediation of historic mine tunnels.</p>
	b. Partner with stakeholders including local councils and water management authorities to manage impacts on existing hydrological regimes.	Medium	Very High	<p>Agree but Very High priority - see pp.33-41 in our longer submission about Camp Gully Creek and the Metropolitan Mine regarding this point.</p>
4. The extent and condition of priority habitats, plant communities and species are maintained or improved	a. Implement relevant actions in the Biodiversity Conservation Program, including actions at key management sites, and recovery plans for nationally listed threatened species.	Very High	Very high	<p>Please see pp.3-9, 10-11, 12-28 in our longer submission regarding threats: there is an urgent need for more recent species count, field surveys, and analysis of threats to animals / plants in the parks. We believe this is essential for NPWS to meet the objectives of the National Parks and Wildlife Act. Clear outcomes should be specified, and reports supplied as to reasons why key threatening processes have not been addressed, even in this current draft plan of management.</p> <p>For instance, the Royal National Park is listed as a site involved in a Saving our Species program for the broad-headed snake, but large areas of habitat have been compromised by illegal mountain bike trails which have</p>

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				been allowed to proliferate. Advice for Broad headed snake rock habitat is to “Limit vehicle and pedestrian access to and recreational use of sandstone escarpments where this species occurs.”
	b. Maintain and protect vegetation extent and continuity and pursue strategic acquisition of lands that will improve connectivity.	Very high	Very high	<p>Please see our longer submission regarding wildlife corridors, pp.10-11. Also strategic acquisitions of land and waters around Port Hacking, and the 5.6 hectare site at Spring Gully in Bundeena: pp.29-32.</p> <p>We support land acquisitions in the Upper Hacking river catchment to maintain wildlife corridors there. It is concerning that land with environmental zoning in critical wildlife corridors is being advertised for sale, divided up in residential lot sized parcels, when building on this land is prohibited.</p>
	c. Support volunteer bush regeneration programs in priority habitats and where aligned to other park management priorities.	High	High	<p>We have made reference to this point in our longer submission: NPWS should support volunteer activity, but should not be relying on volunteers to remove weeds and pest species - staffing cuts compromise park values.</p> <p>We have asked for further information regarding a comparison between current staff levels and levels at the time of the previous plan of management, but this information has not been supplied. Given the huge increase in visitation this is a serious omission.</p>
	d. Monitor habitat conditions to identify emerging threats, including urban interface encroachment, pest animals, weeds and other impacts.	High	Very high	<p>Please see our longer submission regarding this point, pp.3-9, 10-11, 12-28. As mentioned above 4.a. risks caused by key threatening processes must be addressed.</p> <p>“Monitoring” alone is not sufficient, action must be taken.</p> <p>A plan of management should not be empty rhetoric.</p>
	e. Manage pest species in accordance with relevant	High	Very high	Feral pest species are a key threatening process, to date park management has failed to address this effectively.

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	pest management strategies.			This must be done to comply with the requirements of the NPW Act. Please see our longer submission regarding this point, pp.7-9.
	f. Develop and implement a strategic compliance program, with other law enforcement agencies where required, targeting key threats to park values including vandalism, arson, encroachment and habitat disturbance.	High	Very high	<p>Agree but Very high priority - this is of critical importance and is not being addressed - if this is due to a shortage in staffing the plan of management must make it clear what additional resource allocation is required. We have made a number of points which touch on these issues in our longer submission, see pp. 3-8, 12-28.</p> <p>Dogs: Our members have reported on many occasions people with dogs in the park, including many which are off-leash and aggressive and threatening to others. While this is a problem common to parts of the park that adjoin developed areas (e.g. Bundeena, Kirrawee, Grays Point, and Heathcote), there have also been instances where pets have been seen in Audley. Additional signage at key trail junctions would serve to inform those who enter from non-official trail heads. Dog owners must be fined, and NPWS must act to break the existing culture of entitlement which allows park rules to be dismissed.</p> <p>Mountain bikes: A strategic compliance program is needed to ensure bike riders stay on approved paths and are fined when they build or ride illegal paths.</p> <p>Closing and remediating unauthorised mountain bike tracks must be a priority. NPWS must detail how illegal track building will be managed and policed, and how riders on those tracks will be penalised.</p> <p>Empty rhetoric regarding prevention is not sufficient.</p>
	g. Monitor the impact of visitor access and use on natural and cultural values and implement closures or controls as required to	High	Very high	<p>Agree but Very high priority - has been wholly inadequate to date.</p> <p>We view increased monitoring and an increased ranger presence across the park as essential to educate visitors as to appropriate behaviours in relation to protecting</p>

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	protect values. This may include temporary or permanent closure of tracks and campsites, erosion control, fencing and signage.			<p>park values, as well as to ensure visitor safety.</p> <p>More attention is required to educate and enforce track closures for mountain biking.</p> <p>Problems with rubbish left by visitors is escalating. Rubbish attracts foxes. This requires priority attention.</p> <p>No mechanism is in place to remove rubbish from alongside park roads and this needs to be addressed.</p>
	h. Ensure fire management programs protect biodiversity, habitat connectivity and plant communities with limited ability to recover (e.g. swamps, saltmarsh and rainforest).	Very High	Very high	<p>Agree, and suggest the draft plan of management notes the importance of Aboriginal people caring for country and the importance of maintaining, renewing and developing cultural connections. We support these aims.</p> <p>Cool burning is one immediate, practical way of implementing Aboriginal knowledge which cares for country. Sutherland Council's Natural Areas officer has been trialling less intensive burning measures. We ask NPWS to investigate and cost such measures. The Royal, Heathcote, and Garrawarra could be models for best practice land management in this respect.</p>
5. The populations and diversity of native animals are maintained	a. Implement relevant actions in the Biodiversity Conservation Program, including actions at key management sites, and recovery plans for nationally listed threatened animal species.	High	Very high	<p>Agree, but Very high priority - critical for compliance with the Act. Please see pp.3-9, 10-11, 12-28 in our longer submission regarding threats, and comments made above as per 4.a.</p> <p>There is an urgent need for more recent species count, field surveys, and analysis of threats to animals / plants in the parks. This is essential for NPWS to meet the objectives of the NPW Act. Clear outcomes should be specified, and reports supplied as to reasons why key threatening processes have not been addressed, even in this current draft plan of management. i.e. the Royal National Park is involved in a Saving our Species program for the broad-headed snake, but large areas of habitat have been compromised by illegal mountain bike trails which have been allowed to proliferate. Advice for</p>

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				Broad headed snake rock habitat is to “Limit vehicle and pedestrian access to and recreational use of sandstone escarpments where this species occurs.”
	b. Protect priority animal habitats, including heathlands, freshwater wetlands, rainforests, coastal shoreline habitats and wet sclerophyll forests, and implement restoration programs where necessary.	High	Very high	Agree but Very High priority - we have listed this point as a “Very high” priority as conservation is critical for compliance with the Act. Please see our longer submission regarding this point, p.3, pp.3-7, p.8, p.9, pp.10-11, pp.12-28 It is not apparent that the required protection of priority animal habitats is being planned for in any comprehensive way. Numbers of species that are not threatened also appear to be declining yet no study or management plan is detailed.
	c. Encourage and support research into protection and management of threatened animal species.	Medium	Very high	Agree but Very High priority - Critical for compliance with the Act - see our longer submission regarding this point, pp.3-7, 9-11. In particular, koalas face the possibility of extinction in the wild by 2050: these populations are a significant part of our common wealth: an intergenerational asset. They should be declared as such under category 188H of the NPW Act, and overpasses and underpasses between reserves put in place to sustain the species.
	d. Work with the relevant road management agency and other stakeholders to improve connectivity between the parks for the safe movement of animals (e.g. road underpasses and/or fencing).	High	Very high	Agree - but Very high priority - see our longer submission regarding this point, pp.10-11.
	e. Undertake fauna surveys to update and increase knowledge of species diversity and abundance.	Medium	Very high	Agree - but Very High priority - see our longer submission regarding this point, pp.3-9.

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Looking after our culture and heritage				
6. The identity of the parks as an Aboriginal cultural landscape is enhanced	a. Work with the Aboriginal community to develop and implement a strategy to communicate Aboriginal culture and heritage to park visitors.	High	High	Agree - We support the development of an Aboriginal Cultural visitor centre at Garawarra Farm to recognise, respect and support the connection between people from the Dharawal language group and the park lands and surrounding region.
	b. Support Aboriginal communities in developing cultural tourism and education initiatives in the parks.	High	High	Agree
7. The local Aboriginal community has access to Country to maintain, renew or develop cultural connections and practices	a. Support the local Aboriginal community to access Country to maintain, renew or develop cultural connections and practices. This may include culture camps on Country and non-commercial cultural use of resources such as medicinal plants, bush tucker and fish.	Very High	Very high	Agree - we support with the caveat that this will not jeopardise threatened populations. Highly supportive re: cool burning see previous points made (4.h.).
8. There is increased involvement of Aboriginal people in caring for Country and in management of the parks	a. Establish an ongoing and regular process for meeting with Aboriginal land councils, custodial families and other relevant Aboriginal community organisations to discuss park management priorities and directions and opportunities for caring for Country.	High	High	Agree - support strengthening partnerships between NPWS and Aboriginal people in park management priorities and directions.

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9. The condition of Aboriginal heritage sites, places and cultural values is maintained	a. Work with Aboriginal communities to ensure that Aboriginal sites are appropriately recorded, managed and maintained.	Very High	Very high	Agree
	b. Prepare and implement a management plan for the declared Aboriginal Places in the parks, in consultation with the Aboriginal community and in accordance with the Aboriginal Places Policy.	High	High	Agree
	c. Undertake further research into Aboriginal heritage values of the parks to inform management. Target site condition assessments and knowledge gaps, particularly values in inland areas in Heathcote National Park and Garawarra State Conservation Area.	Medium	Medium	Agree
10. Historic and shared heritage sites, places and cultural values are understood, maintained and protected	a. Undertake targeted significance assessment and condition reporting for historic places, moveable heritage and cultural landscapes to address knowledge gaps.	Medium	Medium	Agree
	b. Prepare and implement conservation management	Medium	Medium	Agree

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	plans or heritage impact statements for significant historic places (including items on the State Heritage List), precincts and landscapes, as required.			
	c. Investigate and implement adaptive reuse of heritage buildings listed in Table 5 to support ongoing conservation through sustainable visitor use.	Medium	Medium	Agree - We support adaptive reuse as with Audley Dance Hall and Cafe, and suggest similar adaptive reuse at Bonnievale and Garrawarra where possible.
	d. Record and manage moveable heritage in accordance with relevant policies and conservation management plans and incorporate in the interpretation of the parks where possible.	Medium	Medium	Agree
Providing for visitor use and enjoyment				
11. The parks provide a range of appropriate, ecologically sustainable visitor opportunities	a. Provide a range of visitor opportunities consistent with the park use regulations in Table 7 and the visitor management zones in Figure 3 and Table 2.	High	Medium	<p>Disagree - we do not support the visitor zones delineated in Table 2, and have outlined the reasons for this in our longer submission in relation to the proposed mountain bike plan of management, see pp.3-4, 12-28.</p> <p>Handing over whole zones to mountain bikes, and extending the number of tracks in the park is inconsistent with the objectives of the National Parks and Wildlife Act, especially those sections which require NPWS to conserve nature, and protect the ecological integrity of the parks for future generations.</p> <p>The proposed extension of the mountain bike network is not sustainable visitor use which is compatible with the</p>

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				conservation of natural and cultural values of the parks. Mountain bikes are supposed to stay on designated tracks: the entire area encompassed by zone 2 should not be subjected to the damage that they do. Zone 2 areas contain multiple endangered ecological communities, and endangered species. The vast majority of mountain bike users have failed to demonstrate they have any regard for protecting the ecology of the parks. They have demonstrated they will not stay on established paths.
	b. Enable an appropriate range of events, functions and commercial activities (see Table 8) subject to bookings, approvals and conditions.	High	Medium	Disagree - commercial activities should not take place at the expense of the ecological integrity and biodiversity of the parks. Outsourcing park use to groups and organisations with no training in park values runs the risk of undermining or compromising the ecological integrity of the parks. Mountain bike “events” in particular should not be supported.
	c. Provide a network of tracks, subject to environmental impact assessment, for walking, mountain biking and horse riding, including: i. new walking track connections that support overnight walks and link to public transport (see Figure 2) ii. mountain bike tracks as detailed in the draft Mountain Biking Plan for the parks iii. short connecting track	High	Medium	Support - i. especially the formalisation of a “Burgh Track”, from Helensburgh railway station to Burning Palms, joining the Coast Track route to Otford station. Disagree - ii. & iii. - see our longer submission regarding mountain bikes, pp.3-4, 12-28. We support the urgent closure and rehabilitation of illegal tracks. We also suggest that as a priority NPWS institute a user registration system for mountain bike riders at park entry points (perhaps using similar sign-in technology to that currently being used for COVID / OPAL). Mountain bike riders do not pay park entrance fees – a registration system would assist with compliance issues, and discourage users from building illegal / unauthorised tracks. We do not support any extension to the existing networks for horse or mountain bike riding. Both

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	<p>that links to existing horse riding network in Garawarra SCA</p> <p>Unauthorised tracks will be closed and rehabilitated.</p>			<p>activities conflict with the objectives of the National Parks and Wildlife Act to conserve biodiversity and maintain ecosystem function: they fragment and damage habitat, accelerate erosion, and introduce diseases and weeds.</p> <p>Mountain bike lobby groups and companies that have business which profit from building mountain bike tracks should not be used as consultants by NPWS to advise on mountain bike tracks within NPWS parks. There is a clear conflict of interest employing businesses to advise NPWS on such activities when these groups are likely to directly profit from such works being undertaken.</p> <p>Horse riders and mountain bike user groups represent a tiny proportion of park users. The Royal has “outstanding significance to the nation”, with an estimated 6 million visitors per annum.</p> <p>It is unreasonable to cater for these high impact activities which cause a disproportionate amount of damage. There are many rural areas horse riders can use, as opposed to allowing the spread of weeds into the park. The costs associated with the mountain bike user groups proposal in particular will be very high. The expense involved in closing their illegal tracks is likely to be exorbitant. Neither group currently pays park entry fees. Both groups are well-resourced and should purchase private land for their activities rather than attempting to co-opt public land and add an undue burden of construction and maintenance of these networks to a public park that is already strained due to a lack of funding.</p> <p>The Royal should not be earmarked as a location for extreme sport. As a priority NPWS should work with companies that promote illegal and unauthorised</p>

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				mountain bike trails through online media. The plethora of trails shown serves to promote and advertise illegal activities. Advertising unauthorised trails by any means should be illegal.
	d. Work with mountain bike user groups to implement and maintain the mountain bike track network.	High	Medium	Disagree - see our longer submission regarding mountain bikes, pp.3-4, 12-28. The small number of volunteers who might volunteer to maintain tracks should not be used to excuse or justify allowing the damage caused by the vast majority of others in the mountain bike community. Such activities are a gloss, which attempt to excuse or cover a far more extensive degree of damage, and serve as a Trojan Horse intended to open the parks to irreparable damage created by a far larger number of this aggressive user group.
12. Improved visitor facilities are provided to support visitor enjoyment of the parks	a. Implement visitor facility improvements at key visitor precincts (i.e. Zone 3 locations shown in Figure 3) guided by master plans and subject to environmental impact assessment.	High	High	Agree - with the qualification that this does not compromise the ecological integrity and biodiversity of the parks. For instance, we oppose the proposed increase in the size of the carpark at Wattamolla - alternate forms of transport such as bus services should be supported. The buffer zone between the current car park and native ecology around the site should not be compromised.
	b. Provide and maintain camping areas as detailed in Table 3 and Figure 2, subject to visitor management zones, and environmental assessment of existing and proposed sites. Progressively install toilets and tent platforms where necessary to minimise environmental impacts.	Very high	Very high	We support a general upgrading of facilities at the four major precincts: Audley, Wattamolla, Bonnievale, and Garie with the exception of an increase to parking at Wattamolla. The large visitation rates means that camping should be strictly limited and closely monitored. All camping, whether car-based or walk in should require a booking and oversight by rangers is essential to ensure compliance. In general, we do not support increasing the capacity of camping in the reserves as its close proximity to population centres means resource allocation should be

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	<p>Close identified camping areas when alternatives are implemented.</p>			<p>focussed on day use. However, we support the continuation of car camping at Bonnie Vale and proposed walk-in campsites at Garie and Garrawarra as long as toilets are added and gates are closed at night to prevent those without reservations from entering.</p> <p>The experience of overnight stays would be greatly enhanced if educational talks were provided by rangers, whose increased presence at campsites would help keep vandalism, rubbish, fires and bad behaviour in check.</p> <p>We support the decision to close camping at Lake Eckersley and North Era.</p> <p>Disagree - We do not support the proposal for car camping at either Warumbul, Kellys Falls or Red Cedar Flat because it is an expansion of an activity that requires excessive resources to manage which detracts from attending to use by day visitors. Red Cedar flat adjoins a fragile area alongside the Hacking River and would be damaged by camping.</p> <p>We oppose the operation of ‘glamping’ in Wattamolla or any other area of the reserves as they belong to the public and no areas should be allocated for the exclusive use of commercial operators and their paying clients.</p> <p>We also oppose the use of Mowlee Ridge and Winifred Falls for walk-in camping because it will exacerbate problems with rubbish, vandalism and arson in those areas and pose difficulties if campers need to be evacuated during wildfires.</p> <p>It is evident that problems with rubbish and poor toileting practices already impact greatly at walk-in campsites at Uloola Falls, Mirang and Kingfisher. Unless additional resources (education of campers, oversight by park staff) can be allocated, these campsites should be closed.</p>

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				We do not support a new visitor precinct near Temptation Creek as the purpose would be to service the proposed mountain bike network, which we reject. New Recommendation - toilet facilities should be installed at Karloo Pool to accommodate the high number of visitors. Compliance measures should be implemented to address illegal camping.
	c. Provide (and upgrade as necessary) basic visitor facilities, such as toilets, parking and picnic tables, at Zone 2 visitor nodes (Figure 3) and at appropriate locations along existing tracks and trails to reduce environmental impacts.	High	Very high	Agree - we support the installation of toilets, bbqs, picnic tables and rubbish bins at Red Cedar Flat. Toilet facilities at the South end of Lady Carrington Drive would serve both walkers and cyclists. Disagree - we do not support campgrounds at Kelly's Falls and Red Cedar Flats - both have limited carrying capacity and are within an important wildlife corridor.
	d. Consider improved accessibility and inclusion in the planning and development of visitor facilities and experiences.	High	High	Agree - as long as this does not compromise the ecological integrity of the parks.
13. Visitors enjoy a high quality, safe and meaningful visitor experience in the parks	a. Identify and mitigate risks to visitor safety, including undertaking geological stability surveys of high risk areas.	Very high	High	Agree - but change to High priority , noting also that fences as risk mitigation measures have proved ineffective at Wedding Cake Rock and Wattamolla. We suggest a range of other strategies be used, including visitor education in different languages, across a range of media. Increased ranger presence is required. The need for additional staff identified in the plan of management.
	b. Implement strategies for visitor capacity management in visitor precincts and high use tracks.	Very high	Very high	Agree - due to the increase in visitation an improved system for monitoring and managing the number of visitors in the Royal National Park in particular must be implemented. There comes a point when decisions will need to be made about park closures on a more frequent

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				<p>basis than has been the case to date. This is due to fire risk as much as conservation values. The Royal National Park needs to be closed, and precinct numbers monitored far more effectively at times of peak usage.</p> <p>A booking system for car spaces alone (as proposed for Wattamolla) will not be sufficient to manage capacity in precincts with high visitation rates. Park visitors could be given further incentives to use the current shuttle bus service. This service could be extended to decrease traffic congestion and the need for car parks.</p> <p>The use of innovative technology to monitor and control visitor numbers more accurately should be investigated, perhaps by means of a system to capture number plates at all entrances / exits to the park. (Rangers should not be used as parking police).</p> <p>Currently, mountain bike riders do not pay park entrance fees – a registration system should be implemented at entry points to ensure this is addressed (perhaps using similar sign-in technology to that currently being used for COVID / OPAL). This would assist with compliance issues, and discourage users building illegal tracks.</p> <p>Currently visitors who park in Bundeena to access the Coast Track, Jibbon Head, or Bonnievale can avoid paying park use fees. We suggest NPWS work with Sutherland Shire Council to install parking stations in Bundeena and other suburbs adjacent to the park where this issue occurs. Cars that have paid the park fee could be exempt, and local residents. (Visitor parking permits could be issued, as has been done in inner city suburbs.)</p> <p>Ticket sales should be used more effectively to educate visitors about park values and rubbish removal.</p>
	c. In consultation with the relevant waterway	Medium	High	Agree - but change priority to high. To date strategies for ensuring compliance with existing regulations has

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	management agency, investigate and implement measures to reduce the impacts resulting from use of personal watercraft and vessels in South West Arm Creek, Cabbage Tree Basin.			been wholly ineffective. We look forward to measures that will result in actions as opposed to empty rhetoric. We suggest NPWS work with boat user groups such the Royal Port Hacking Motor Yacht Club to educate them about endangered seagrass and how essential it is for fish habitat and breeding.
	d. To support recreational opportunities, visitor safety and protect environmental values, work with the relevant waterway management agency to manage boat moorings in South West Arm Creek.	Medium	Medium	Agree - but suggest the installation of seagrass friendly moorings.
14. There is increased awareness and understanding among visitors about the parks' values	a. Interpret and promote the parks' values through a range of measures, including signage and use of innovative and emerging technology.	High	High	There needs to be far more effort put into educating park visitors, especially mountain bike riders, about biodiversity, park ecosystems, and the need to care for the fragile ecology of the parks. Educating visitors about rubbish removal and littering should also be made a high priority.
	b. Enable access to the parks by commercial tour operators, subject to NPWS licensing, capacity limits and NPWS policy requirements including Aboriginal engagement requirements.	High	Low	Disagree - see our additional submission regarding this point, and in particular commercial mountain bike operators. Priority should be given to the public rather than paying clients of commercial operators. The Royal National Park, in particular, is subject to high visitation rates and should not be opened to private operators to run events. Any licensing of private operators in the parks should be dependent on whether their activities contribute towards the objectives of the <i>NPW Act 1974</i> and are compatible with Section 30 E of its "park management principles". In general, the parks are not suitable venues for

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				<p>competitive mountain biking events. In holding a large commercial MTB event, the organisers would need to show assessment of impacts and risks to ground fauna and threatened flora species.</p> <p>Likewise, questions of equity should be considered for exclusive, commercial operator glamping sites in a highly visited area of the Royal National Park. Such an exclusive use, in open grassed areas would impinge on picnickers, bush walking and other park users.</p> <p>The development of a list of NPWS incompatible commercial uses should be developed to guide the community in this matter.</p>
	c. Provide a program of school and community educational opportunities in the parks and support the Royal National Park Environmental Education Centre to provide educational services to schools.	High	Very high	<p>Support as a very high priority. We note that there is currently little attempt to deliver information about the biodiversity and ecology of the parks to the estimated 6 millions visitors per annum to the Royal. There is no obvious attempt to cross sell intriguing information about the unique and precious ecology of the parks, to entice visitors to find out more, or encourage them to support further learning on the part of their children.</p> <p>Visitors to the park are a ‘community’ who are simply not being involved by NPWS to value the ecology as anything other than pretty scenery. We suggest the NPWS Interpretive Ranger Program be reintroduced.</p>
Park infrastructure and services				
15. Management facilities adequately service management needs and have minimal environmental impacts on park values	a. Subject to assessment and necessary approvals, decommission, close to public use or remove park management infrastructure and facilities that are unsustainable and/or not in active use.	Medium	Medium	We agree and support the closure of North Era campground in particular.

Outcome	Actions	Priority	SSEC Priority	SSEC Response
	b. Implement a prioritised reserve access strategy and investigate and secure legal access to the parks as required.	High	High	Agree
16. Protect cultural and natural assets and infrastructure from the impacts of coastal hazards and sea level rise	a. Undertake an assessment to identify and determine appropriate management actions for those values and locations at risk of coastal hazards and sea level rise associated with climate change.	High	High	Agree - Especially in relation to Bonnievale campground, in keeping with the principle of adaptive reuse we suggest installing an environmentally friendly seawall as per the one put in place for the Carss Bush Park Channel and Foreshore Naturalisation project. <i>See our longer submission re this point, pp.29-31.</i>
	b. Participate in the development of any relevant local coastal management plan and ensure that actions required on NPWS lands are included in the plan.	High	High	Agree - <i>see our longer submission regarding this point, and Port Hacking additions to the NPWS Estate, pp.29-31.</i> Sutherland Shire Council is not preparing management plans for the Port Hacking estuary quickly enough. Urgent action is required to protect endangered and critically endangered flora and fauna in this area.
17. The impact of fire on life, property and the environment and the potential for spread of bushfires on, from or into the parks are minimised	a. Implement the park fire management strategy.	Very high	Very high	Agree - <i>with reference to previous points (4.h. and 7.a.) made regarding the implementation of cultural / cool burning.</i>
	b. Revise and adjust the fire management strategy as required to take account of new information and emerging threats over time.	Very high	Very high	Agree - to address increasing threat from climate change in particular. <i>Recent sightings of koalas in the Royal and Heathcote National Parks will need to be incorporated into NPWS fire management strategies.</i>

Outcome	Actions	Priority	SSEC Priority	SSEC Response
	c. Participate in strategic fire planning through the relevant bush fire management committee and emergency management committee and maintain cooperative arrangements with local Rural Fire Service brigades, other fire authorities and surrounding landowners.	Very high	Very high	Agree - with reference to previous points (4.h. and 7.a.) made regarding the implementation of cultural / cool burning.
Non-park infrastructure and services				
18. Non-NPWS uses and activities have minimal impact on park values and are appropriately authorised where required	a. Seek removal and site rehabilitation by the relevant owner and operator of obsolete or disused infrastructure or encroachments, except where environmental or other considerations justify leaving them in situ.	Medium	Very High	Agree - but this should be listed as a very high priority, especially insofar as relates to illegal, unauthorised mountain bike trails. These should be removed and remediated as a matter of urgency. NPWS must be able to demonstrate it is able to manage and prevent illegal and unauthorised activities.
	b. Ensure all non-NPWS uses and occupancies of NPWS land are authorised in accordance with Part 12 of the NPW Act.	Medium	Medium	Agree