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Planning Evaluation and Assessment
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5 September 2019

Dear Sir/Madam,

RE: Planning for the future – new plan of management for Ku-ring-gai Chase National Park

Thank you for allowing Friends of Ku-ring-gai Environment (FOKE) to comment on the five discussion papers as detailed below.

Overriding all our statements is FOKE's strong support for the defining Park Values statement under Discussion Paper 'Natural, visitor experience and shared heritage values':

'NPWS is required to manage national parks and nature reserves in line with the purpose for which they were established:

- *The purpose of reserving land as a national park is to identify, protect and conserve areas containing outstanding or representative ecosystems, natural or cultural features or landscapes or phenomena that provide opportunities for public appreciation and inspiration and sustainable visitor or tourist use and enjoyment (section 30E of the National Parks and Wildlife Act).*
- *The purpose of reserving land as a nature reserve is to identify, protect and conserve areas containing outstanding, unique or representative ecosystems, species, communities or natural phenomena (section 30J of the National Parks and Wildlife Act).*

Sustainable visitor or tourist use, and enjoyment is not one of the purposes for establishing a nature reserve.'

Identification, protection and conservation of biodiversity, ecosystems, species and ecological communities must remain the overriding priority for Ku-ring-gai Chase National Park Management. NPWS must not compromise this objective in order to satisfy visitor and tourist demands.

FOKE is concerned that there is a lack of funding for the ongoing maintenance, protection and conservation of National Parks. It is particularly disturbed that the NSW Government is pushing NPWS to rely on commercial activities for future funding.

1. Aboriginal cultural values discussion paper

FOKE supports the protection and conservation of Aboriginal cultural values, by:

- Encouragement and support of the Aboriginal community to guide and participate in the development, implementation and review of park management programmes.
- Respecting their traditional knowledge, values and practices to inform and to incorporate into management programmes.
- Employing Indigenous Rangers.

Opportunities to find out about Aboriginal cultural values

- Providing aboriginal cultural activities and programmes including oral history.
- Improve the maintenance of existing aboriginal cultural sites and provide improved interpretive information.

- Increase the number of cultural sites to visit.
- Investigate the establishment of an Aboriginal cultural centre at a location where there is a predominance of visitors. The centre should be co-located with an existing information centre or established within the building footprint of existing infrastructure rather than appropriating new areas that will remove habitat from the Park.

2. Natural, visitor experience and shared heritage values discussion paper

Most important values

Identification, protection and conservation of biodiversity, ecosystems, species and ecological communities must be the priority.

- Ensuring ecological diversity and wildlife connectivity should be central to park management. This includes strategic restoration of disturbed and fragmented areas within and external to the Park.
- Education of its users to promote an understanding of the park's natural and cultural values is required for preservation of the integrity of the park in the long term.
- Visitor experience and numbers must be managed in a way that does not compromise the park's ecological and natural landscape values.
- Environmentally sensitive areas within the Park must be identified and mapped and inaccessible to visitors.

Fire

- The most important considerations for managing fire in the park are to continue the ban on smoking and to include a ban on portable gas and spirit stoves in the park but increase the number of electric BBQs in picnic areas and campgrounds.
- Better monitoring and enforcement of bans would be a deterrent.

Pests

- More funding needs to be allocated to educating visitors and surrounding residents regarding the issues with weeds and pests that can infiltrate the park. Where necessary barriers may need to be introduced as a deterrent to pests.
- Volunteer groups are a wonderful asset, but should not be the sole source of bush regeneration and weed management.

Visitor Activities

The balance between visitor use and protection of the natural values

It is of concern that increased visitor numbers, promotion of tourism, pressure from sporting clubs and other conflicting activities will result in irreversible pressure and negatively impact the core purpose of protection and conservation of the environment.

- Baseline studies should be established and effective monitoring systems adopted to assess and record environmental changes over time due to human impact. This would allow appropriate action to be taken based on evidence if there is degradation of natural areas.
- A priority should be the education of visitors to assist in their understanding of the values of the park and the importance of management for its long-term preservation to assure their enjoyment, and the enjoyment of future generations.
- Any activities and sports that heavily degrade areas or that are difficult to manage should be banned.
- Horse riding and mountain biking should not be introduced into the park but limited to existing horse trails and mountain bike facilities. Both activities cause a lot of erosion. In addition, mountain bikers are notorious for going off track and damaging surrounding natural areas.

Illegal or unauthorised activities

FOKE supports the existing measures taken.

- CCTV cameras might be introduced in problem areas.

- It is proposed that NPWS requires more funding and resources for signage, education and law enforcement, including rangers during peak times in high risk areas including the island Nature Reserves.
- Conduct a review and increase fines as necessary.
- Educate people to identify the illegal activities and supply signage and number to report illegal activity.
- Lobbying of State Government is required to increase funding.

Shared heritage values

Post settlement and social history explain the context for the built heritage. Both values are inextricably linked.

- It is easier for people to identify with built heritage as buildings are tangible. Buildings should be preserved and adaptively reused if necessary.
- Signage, photos, information centres and tours could promote both values.

The most important considerations for protecting shared heritage.

The cultural and natural values are part of any location's special identity.

Proposals for adaptive reuse

FOKE supports adaptive reuse of buildings and advocates uses that benefit the public (such as education and information), that are not prohibitively costly or exclusively for private use. Use as accommodation facilities needs to be balanced with potential negative impacts such as access, bushfire Asset Protection Zones (APZ) and utilities.

3. Recreational activities discussion paper

Response to evolving recreational interests

Identification, protection and conservation of biodiversity, ecosystems, species and ecological communities must be the priority in any response to recreational activities.

Certain activities like horse riding and mountain biking should be banned due to their comparatively high levels of environmental damage. Mountain bikers are notorious for riding off track.

Should these activities be pursued they must be restricted to specific designated tracks and there should be no shared tracks to avoid conflict with walkers.

Monitoring of impacts of all activities should be carried out to determine damage to the environment and appropriate management actions to be taken.

Low-impact recreational activities should be supported, such as bushwalking, which is the predominant nature activity within the park.

New and improved bushwalking experience.

- Use raised boardwalks, or other protective techniques, to reduce erosion and surface impacts of tracks where necessary.
- Loop walking routes, particularly loop walks linking existing tracks (subject to environmental impacts).
- Establish a foreshore walk, only where it will have minimal environmental impact.
- Guided walks with certified guides. Training to be based on core competencies related to the interpretation of cultural and natural values, minimising visitor impact and understanding permit conditions.

- Have some accessible walks for people with mobility limitations.

Camping and accommodation

Forms of accommodation

- Resort and hotel accommodation is not supported as it would encourage intense development and ensuing damage due to infrastructure, sewerage, water supply and environmental impacts due to clearing and bush fire protection zone.
- Subject to environmental impacts, extend the existing camping areas. Only consider new ones in a location that has already been cleared.
- To limit impacts on the environment and to limit infrastructure construction and costs, increase toilets, BBQ, picnic facilities in existing areas.
- Any new accommodation should not be a permanent structure, so that they can be removed, when appropriate, for regeneration of the area.
- When developing facilities give priority to protecting the environment and consider the impacts of the bushfire Asset Protection Zone (APZ) at the location.
- FOKE does not support fixed Safari style accommodation, as this would limit or reduce the availability of ideal sites to the general camping public.
- Overnight stays should be limited to a maximum number of nights.

Drones

Drones are noisy and intrusive and can interfere with the visitor enjoyment of the park as well as impact wildlife. Recreational use of drones is inappropriate in National Parks.

Licenses should be required for specific and limited uses, not for recreational uses.

Group activities and organised events

- The current limits on group size are appropriate.
- Ensure that environmental impacts and impacts on other park users are minimised through the licensing or consent process.
- Monitoring will be essential and regular review of group sizes and event impact to determine whether these should be reduced.

Horse riding

Given the environmental values of the parks and the need to balance access and recreational use across a range of activities, additional access for high-impact activities such as horse riding should not be authorised.

Bush tracks should not be shared with horseriding and mountain bike activities for the safety of walkers.

Mountain biking

Mountain biking in National Parks should be banned. Formalised mountain bike tracks are provided in local council areas. Mountain bikers are notorious for going off track and for causing erosion on tracks. They also present a safety risk to walkers.

Road cycling

Road cycling in the park could be more enjoyable and safer if there were a bicycle lane. As funding may not be available, lowering of traffic speeds could benefit cyclists, drivers and pedestrians.

Road cycling events should be minimised and avoid peak use times within the park.

Volunteering

Volunteers or local history groups could research heritage and cultural values of the park in view of Heritage Conservation projects.

Water based activities

Prohibit the size of boats in certain locations. As the waterways are ideal for kayaking and canoeing, it is appropriate to limit the size of boats within a certain distance of the foreshore.

4. Visitor Destinations discussion paper

Tourism development must not be at the expense of the park's natural and cultural values or community enjoyment of the park.

Provide and encourage people to take electric powered shuttle bus service at peak times, from carpark areas situated on the fringes of the park. It is essential that public transport is improved to the park from train stations and bus nodes, which will then necessitate buses within the park itself.

An online booking service to control parking capacity must not exclude others who visit the Park spontaneously, with a proportion of car spaces unavailable for booking.

It is recommended that NPWS add more staff to manage visitors and activities at peak times to both enhance the visitor experience and to better protect the park from damage. We find the issue of improved services is problematic as the more you improve, the more visitors come, putting further pressure on the Park. The overriding purpose must remain protection and conservation rather than visitor numbers.

As Sydney continues to grow, we must accept that in peak times, not all visitors will be allowed to enter the park. Establishing a limitation on visitors now, whether parking within the park or outside in designated carparks, will be a good step for the future management of the park. If well monitored, this will provide information on areas for improvement as visitor numbers will undoubtedly increase over time.

FOKE supports updating facilities in areas currently available for camping, picnics etc. However, we do not support extending the available destinations across the park into new areas. We do not support developments within the park that will damage a specific or well-loved natural environment through significantly increased visitor numbers or the attendant damage associated with any form of fixed accommodation.

5. Leases, licences and consents discussion paper

The NPWS must be the ultimate authority of the park and not private interests.

Agree with the need for consents for any events. However, these should also be monitored by size to determine their impact and damage, so as to guide policy on future events.

FOKE supports the use of more guided walks by experienced and certified groups.

FOKE supports NPWS maintaining a much stricter approach to the management of private interests and leases in this new plan of management. Where the opportunity arises, moorings and leases should be bought back by the park.

If you wish to contact us directly please do not hesitate to email on info@foke.org.au

Yours Sincerely,

Kathy Cowley

Kathy Cowley
President