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Dear Sir/Madam

21 November 2022

RE: Ku-ring-gai Chase National Park and Island Nature Reserves Draft Plan of Management

Thank you for giving Friends of Ku-ring-gai Environment (FOKE) the opportunity to comment on the Draft Plan of Management (PoM) covering Ku-ring-gai Chase National Park and Island Nature Reserves.

FOKE agrees with the opening statement of ‘Why these parks are important. The national park and island nature reserves are valued by the community for their beautiful and varied scenery, important conservation and cultural heritage values, nature-based visitor experiences and for the spiritual and cultural connections the traditional Aboriginal custodians have with the landscape.’ FOKE supports the six points offering greater detail.

However, we believe there are a number of areas where this plan can be strengthened and/or improved such as:

- Include reference to the new initiative of the Ku-ring-gai GeoRegion and potential of progressing to an Aspiring UNESCO Global Geopark.
- In the 2019 range of discussion papers informing this plan, FOKE recommended the establishment of an Aboriginal cultural centre to assist with Aboriginal engagement and increased visitor awareness and protection of sites.
- As per our 2019 submission we continue to discourage the use of multi-use trails and specifically extending mountain biking trails. We also reiterate our concerns regarding extending accommodation options.
- We also submit some additional detail on the geology from eminent geologists Dr J Martyn and Dr P Mitchell OAM, which may be incorporated into this management plan.

Addition of reference to the Ku-ring-gai GeoRegion (KGR)

The apparent oversight of any reference to the Ku-ring-gai GeoRegion is not consistent with the fact that the NPWS participates in the GeoRegion’s regular stakeholder working group reviewing the geotrails and geosites for access.

Moreover, during the past three years, the GeoRegion steering committee has sought and received support from local community groups, local politicians, the three councils involved (Hornsby, Ku-ring-gai, and Northern Beaches) as well as the National Parks and Wildlife Service (NPWS).

FOKE proposed this major new initiative to create awareness of the importance of the cultural and natural heritage of the Ku-ring-gai Chase National Park. This has now extended to a GeoRegion which encompasses Muogamarra Nature Reserve, sections of Berowra Valley National Park, Lane Cove and Garigal National Parks, while encompassing the whole Ku-ring-gai Chase National Park as its centrepiece.

The work undertaken to date in terms of the scope and content in developing the concept of a GeoRegion and geotrails has produced detailed documentation highlighting over 50 nationally and internationally significant geosites that will add to the natural and cultural value and significance of Ku-ring-gai Chase National Park. The full details are in the recently published Linnean Society paper, *The Natural and Cultural History of the Ku-ring-gai GeoRegion*, as attached to this submission (link is <https://bit.ly/3UCR6Zm>)

NPWS has been one of the key stakeholders involved in the working group developing this initiative which aims to eventually nominate as an Aspiring UNESCO Global Geopark resulting from the significance of the KGR's outstanding geoheritage and other key natural and cultural features.

The Ku-ring-gai GeoRegion (a pilot project of the AGC's National Geotourism Strategy) is also referenced and recognised in the Australian Government's THRIVE 2030 Visitor Economy Strategy as having the potential to be one of three GeoRegions to be nominated as an Aspiring UNESCO Global Geopark for Australia. <https://www.austrade.gov.au/news/publications/thrive-2030-strategy> (Page 43).

It is anticipated that, with State Government support, an application as an Aspiring Global Geopark will be undertaken during the tenure of this PoM. Its omission, by the major land manager of 48% of the GeoRegion area, would hamper the success of any application. To be approved by UNESCO, Global Geoparks nominations *'require a management plan, agreed upon by all the partners, that provides for the social and economic needs of the local populations, protects the landscape in which they live and conserves their cultural identity. This plan must be comprehensive, incorporating the governance, development, communication, protection, infrastructure, finances, and partnerships of a proposed UNESCO Global Geopark nomination'*.

FOKE is supported by the Australian Geoscience Council Inc (AGC), which is of the view that this PoM should properly cite and recognise the existence of the KGR, particularly as the Geological Survey of New South Wales (of the Department of Regional New South Wales) reviewed the project in 2021 and has advised that, while concerned that appropriate steps will need to be taken by three Councils and the NPWS to ensure it is responsibly managed, the Survey has no objection to any proposal to develop the KGR.

It is essential for this project to achieve its objectives to have NPWS support that is visible in this plan with reference to items within Section 6, Scheme of Operations, in which the geotrails and geosites are developed and a GeoRegion information and education facility becomes operable over the term of this plan.

Of UNESCO's ten major focus areas of global geopark development (<https://en.unesco.org/global-geoparks/focus>) FOKE's project steering committee believe that five are particularly relevant to the Ku-ring-gai GeoRegion project.

1. Science – continuing abiotic and biotic research activities.
2. Education - developing and operating educational activities for all ages to spread awareness of the geological heritage and its links to other aspects of the GeoRegion's natural, cultural, and intangible heritages.
3. Local and indigenous knowledge - local and Aboriginal peoples, by preserving and celebrating their culture.
4. Geoconservation – promoting the concept of sustainability, valuing the heritage of 'Mother Earth' and recognising the need to protect it.
5. Climate Change - effects of current climate change thus giving the opportunity to show visitors how climate change can affect our environment.

Aboriginal Cultural and Interpretative Centre

Studies such as the already referenced *Natural and Cultural History of the Ku-ring-gai GeoRegion* continue to highlight the extent of aboriginal sites in Ku-ring-gai Chase as being one of the densest areas in Australia. These sites include middens, petroglyphs, grinding grooves, rock shelters and rock art.

The PoM does not offer any new initiatives for Aboriginal culture and history to be made available to either the Aboriginal and/or the wider community. It is also noted that there still is not a full survey and record of Aboriginal sites in this new PoM.

This is an important oversight as the plan refers to greater engagement with the Aboriginal community and the need to protect sites as well as educating the next generations of Aborigines on their history and extending that within the wider community. This issue needs to be reconciled with the NSW Government's recommended Aboriginal joint management model.

As raised in our 2019 submission, we recommend that an Aboriginal cultural and interpretative centre is established within Ku-ring-gai Chase National Park. This would assist with respectful engagement with Aboriginal groups, address the interest and education needs of the wider community and tourists, as well as highlighting significant sites that are not able to be visited because of their 'sacred' nature or inaccessibility.

The references in the document for the adaptive reuse of existing buildings could afford the opportunity to present such a centre, as well as providing a rationale for upgrading these buildings.

Multi-use trails and Mountain Bike riding

FOKE continues to view multi-use trails as dangerous to the greatest number of park users, being bushwalkers. Horse riders and mountain bikers especially tend to speed along the trails not only making it a hazard for bushwalkers and family groups, but also degrading and eroding the actual trail, causing long term damage.

We note, in the Planning Considerations document, that two designated areas on the outer rim of the park may be available for mountain biking following further assessment. We recommend identifying signage and CCTV to ensure that these trails are not further extended into the park. Mountain bikers are notorious for going off track, building structures on tracks causing erosion and physical damage on tracks, as well as presenting a safety hazard to walkers. The PoM should stipulate that any future trails must not pass through threatened ecological vegetation.

We also note that the Planning Considerations document states, on page 41, that 'As a result of consultation and environmental assessment, the number of trails available for horse riding in the park was expanded, and potential new link trails were identified. Most of the identified priorities and trails have been established.'

Again, we recommend monitoring of these trails to ensure the ecological communities are not further degraded. From these statements we do not expect any further horse-riding trails to be added in the PoM.

Visitor Destinations and accommodation

FOKE supports the proposal to look at further camping experiences which comply with the Precinct Conservation Plan however it is concerned by the proposal for serviced camping referenced in the Basin Precinct, page 36 of Planning Considerations. The value of the Basin Site is its very beautiful and natural state and the animals that it attracts. An excessive increase in visitors and built facilities will impact on the very quality of the experience offered at the Basin.

In extending accommodation options, such as serviced camping, priority needs to be given to protecting the environment and it is necessary to consider the impacts of the bushfire Asset Protections Zone (APZ) at the location.

Plan of Management Specific recommendations to address the above issues:

1. Our Vision for the parks.

- Reword the first dot point to include geology: “maintain the parks’ natural environments, ensuring important biodiversity, habitat, geological features and vegetation communities are conserved.”
- Add a new dot point: “support the development and education of geotrails and geosites as part of the Ku-ring-gai GeoRegion with the potential of achieving government support of the nomination as an Aspiring UNESCO Global Geopark.’

2. Section 3. Providing for Visitor Use and Enjoyment.

- a. Include ‘Development of geotrails and geosites with an attendant GeoRegion education and interpretation facility located within the Park. The GeoRegion and geotrails are one of the new initiatives to add both nature-based interest and educational opportunities for visitors.’
- b. Add that as the significant land manager, NPWS works collaboratively with community groups and local government in the development of regional tourism and visitor use trails, such as geotrails, which highlight the natural and cultural heritage values of the region.
- c. New walking tracks and trails and associated visitor facilities and services may also be provided to enhance education and interpretive programs and to better align with regional programs and networks (not just those within the park).
- d. On page 9, the statement ‘NPWS will also investigate opportunities to provide a walking track and viewing area on the eastern side of the headland to allow safe viewing of the seal colony’ is incorrect. The seal colony is not on the eastern side. A more important priority should be to establish a safe walking track (a geotrail) right around the headland just above sea level that can present and interpret the amazing geological features of Barrenjoey to the public. Such a track will pass the seal colony though this would need to be done sensitively.

3. Section 6. Scheme of Operations.

- a. Page 18, **Protecting the natural Environment**. Point 1. Add geotrails and geosites as follows: ‘Maintain and upgrade tracks and trails, including realigning tracks and trails, repurposing trails and sites as geotrails and geosites, ...’. Priority High
- b. Page 20, **Looking after our culture and heritage**. Point 6c. Add ‘with a view to establishing an Aboriginal cultural and interpretative centre within the park.’ Priority High.
- c. Page 21, Point 9b. **All historic buildings should have a conservation management plan, not just a few**. These buildings that reflect their past uses, including during WW2, should be conserved for the future and adaptively reused to support the visitor and education communities re the natural and cultural heritage of the park.
- d. Page 22, **Providing for visitor use and enjoyment**. Point 11. Add ‘Identify and develop geotrails and geosites, with attendant GeoRegion information on signage and via a relevant visitor education facility. Priority High’.
- e. Page 22, point 12. **Additional Point**, ‘New walking tracks reflecting the linkage of various geotrails and geosites as part of the Ku-ring-gai GeoRegion initiative and as agreed by the GeoRegion stakeholder committee, which includes NPWS. Priority High.’
- f. Given the significance of safe and enjoyable bushwalking in the park, 12b should be given ‘Very high’ priority and the track and trail improvement program developed in conjunction with community and peak user groups.
- g. Amend 12e to ‘Realign and reroute walking tracks, where required, to protect and/or better present the national park’s natural and cultural values or provide improved safety, amenity and interpretation of values for visitors.’

- h. Add a new point under Visitor Use that reflects the need for regular monitoring of mountain bike and horse-riding trails to minimize environmental degradation in the surrounding ecological communities or any illegal extensions of the trails. Priority High.
- i. Page 23, point 14. 'Support the geotrails, geosites and GeoRegion with information and education facilities supported by digital technology. Priority High.'

FOKE supports updating facilities across the parks and improving visitor experiences with the addition of an Aboriginal Cultural and Interpretative Centre, the addition of geotrails and geosites to support the Ku-ring-gai GeoRegion, including the addition of a GeoRegion educational centre.

We also support the use of digital technology to further enhance the visitor experience and education value provided to better understand the natural and cultural heritage of the parks.

Overall, it remains essential that the park is managed for the benefit of current and future generations by conserving and protecting the parks' natural environments, its biodiversity, habitat and vegetation communities, maintaining the heritage buildings, Aboriginal sites, its significant geology, the ecological communities and fauna throughout the parks.

We hope you carefully consider our comments and look forward to your response.

Yours sincerely,

Kathy Cowley
PRESIDENT

cc Mayor and Councillors
cc The Hon Jonathan O'Dea MP Member for Davidson
cc The Hon Alister Henskens SC MP Member for Ku-ring-gai
cc The Hon Paul Fletcher MP Member for Bradfield

Attachments:

Review Paper: The Natural and Cultural History of the Ku-ring-gai GeoRegion, NSW, published November 2022. <https://bit.ly/3UCR6Zm>

Appendix A. Recommended rewording of Geology sections within Planning Considerations document by Dr J.E Martyn, author and retired consultant Geologist, Dr Peter Mitchell OAM, retired Macquarie University, former School of Earth Sciences.