

26 October 2022



Illawarra Branch
illawarra@npansw.org.au

NSW National Parks and Wildlife Service
Via email: npws.parkplanning@environment.nsw.gov.au

Dear Sir/ Madam,

ILLAWARRA ESCARPMENT STATE CONSERVATION AREA DRAFT AMENDMENT TO THE PLAN OF MANAGEMENT

NPA Illawarra is happy to have the opportunity to comment on the proposed amendment to this Plan of Management. We appreciate that changing circumstances and demands call for changes to management plans. However we are disappointed in the lack of rationale and detail in this amendment. We believe that POMs should be very clear about what is permitted and not permitted at particular locations and what parties may participate.

We believe that the unique and fragile nature of the Illawarra Escarpment calls for particular care in planning permitted activities. To quote from the NPWS Plan of Management: *'The Illawarra Escarpment Conservation Area protects a geologically and climatologically unique landscape ... the [Great Escarpment] provides for a wet and productive ecosystem, rich in biodiversity. It protects national and state listed threatened animals and plants'* Hence the Great Southern Walk requires sensitive planning and must not be equated to walks elsewhere (such as the Royal National Park). Further the POM recognises that the IESCA is *'significant to both the Aboriginal and non-Aboriginal communities ...'*

To quote from the Draft Amendment of the Plan of Management, *'The Illawarra Escarpment Conservation Area is reserved to achieve objectives of the National Parks and Wildlife Act 1974 centred on conserving nature and cultural heritage values, and fostering appreciation, understanding and enjoyment of these special values.'*

It is with respect to the uniqueness of the escarpment and NPWS' legal obligations, stated values and objectives that **we strongly oppose four aspects of this proposal.**

- 1. P4: NPWS may engage commercial operators to provide support services to walkers on the Great Southern Walk. This could include guiding, food and supply drops, facilities maintenance (see Figure 3 for potential campground locations) of walker accommodation and hiker pick-up and drop off services***

We acknowledge that there are already commercial operators working in the IESCA but understand that their activities are limited and must be in keeping with the objectives quoted above. We are very concerned at the vagueness of this provision and think the POM should

head office: PO Box 528 Pyrmont NSW 2009 **visit us at:** Suite 1.07, 55 Miller Street, Pyrmont
tel: 02 9299 0000 **email:** npansw@npansw.org.au **web:** www.npansw.org
abn: 67 694 961 955 **donations** are tax-deductible and gratefully received



specify the limits of what commercial operators may provide.

We strongly oppose the exclusive lease of huts or campgrounds to commercial operators and think the POM should explicitly rule this out. We fear that the presence and interests of commercial operators ('glamping' experiences) come with trail fees and 'no-go' exclusive zones, potentially shutting walkers out of some areas of the park.

2. P5: Permit walk-in camping in the Maddens Plains area as part of the Great Southern Walk (see Figure 3 for potential campground locations). Subject to environmental and cultural heritage assessments, provide walkers' huts, other hard-roofed and/or tented accommodation and associated facilities, such as walking track connections and a vehicle service road.

We question the wisdom of introducing a campground so close to the coastal village of Stanwell Park, which the Great Southern Walk actually passes through. Isolated campgrounds may encourage vandalism and illegal activities. We advocate for a walkers' camp off-park but near to the Stanwell Park township that could for example be sited on Council land. The model we are aiming for is one that boosts the economy of local villages.

Along with the Illawarra Escarpment Alliance (EscA) we support the conditions listed by Bushwalking NSW (BWNSW) in its submission, namely that such accommodation should:

- *be located in areas that are already disturbed and of low ecological value, and that make use of existing vehicle access;*
- *be constructed and managed directly by NPWS, with no commercial operators allowed;*
- *be simple, basic and affordable to all, designed to have minimal environmental impact during construction and operation (e.g. no on-site waste management, no running water, no electricity);*
- *be implemented in conjunction with activities to restore disturbed/degraded vegetation;*
- *be accessible to walkers seeking to stay for a single night rather than requiring them to book a multi-night walk.*

Any such accommodation should only be approved subject to the completion and approval of a comprehensive and publicly exhibited environmental impact assessment. We agree with BWNSW that NPWS needs to modify the wording of the amendment to specifically rule out design, construction, operation or management of camp sites by a commercial operator.

We think that NPWS should have done the essential assessment and planning to establish where the new campground should be, and specified the exact location and dimensions in this amendment. It is not satisfactory that there appear to be four possible hut/camp locations being proposed. One of the sites is located on the old SADA Group coal processing land that was handed to NPWS as a mining offset. If it proceeds on that site extensive remedial work is likely to be required beyond construction of any camp facilities.

Furthermore NPA has concerns about the status of this land, which we understand has been acquired but not yet gazetted by NPWS. We question whether incorporating it in the POM may be premature, since its status has not yet been clarified and a different management framework may be required.

NPA's strong preference is that walker accommodation should be sited off-park wherever feasible. This is for reasons both of environmental impact and benefit to the local economy. NPA's Illawarra Branch have for several years lobbied for off-park accommodation, citing the Great Ocean Walk in Victoria as a comparable model, with private operators offering transport to track heads, etc. We request that the POM include the option of off-park accommodation and reconsider the need for a campground in the park, particularly one with built accommodation.

3. P5: Group activities or gatherings involving more than 40 persons require written consent in accordance with the National Parks and Wildlife Regulation 2019.

No explanation or justification is offered for this increase, which covers activities not otherwise mentioned in this amendment. We cannot envisage how it is feasible to have parties of 40 doing anything in the IESCA without risk of serious impacts. Increasing group sizes to this extent will promote further conflict between different user groups. We consider this suggestion to be irresponsible and illogical, sending an inappropriate message to park users that more or less 'anything goes'.

NPA believes that the limit of group activities without written consent should stay as at present:

- cycling, including mountain biking: 20 people
- horse riding: 8 horses
- rock climbing: 4 per roped party
- walk-in camping: 16 people
- other activities: 20 people.

4. P7: Rock climbing and abseiling will be allowed on the west- and south-facing cliffs of Mount Keira and north of Bulli Pass.

We support in principle that additional areas of rock climbing be permitted north of Bulli Pass. But we cannot accept the 'open slather' implications of this vague wording, which is likely to encourage the inexperienced to enter dangerous areas and increase access tracks and general off-track activity. We strongly urge NPWS to limit these areas to those identified as safe by the Australian Climbing Association (NSW). We understand that there are in fact only two areas that are suitable for this sport: above Coalcliff and in the Stanwell Tops area. Such suitable areas must be clearly identified to avoid injury and damage to areas which may be unstable. NPWS must ensure that trails which lead to suitable climbing sites be clearly marked, avoiding the proliferation of unauthorised trails and dangerous climbing sites.

Further, we support ACA's request that the replacement of bolts and anchors be allowed, and that this be by authorised persons, for the purpose of '*upgrading old and dangerous bolts and chains ... in place for 30 years or more*'. Overall in relation to rock climbing NPWS needs to conduct a safety audit of the access points (as much for non-climbers exploring the access tracks as for anyone else), set standards for attachments and, most importantly, have in place monitoring to gauge the sustainability of site usage.

Additionally, throughout the amendment and the POM generally we would like to see a more explicit commitment made to consulting the traditional owners and their representatives. They should be involved in the process of establishing the location of any tracks, rock climbing sites and campgrounds. It would also be desirable to have First Nations involvement in the

management of any accommodation, which ideally would be designed to reflect the indigenous cultural heritage of the area with a view to providing visitors with an educational experience.

We assume that we will have the chance to read the overall Submissions Report for this proposal.

Thank you for the opportunity to comment.

Yours faithfully,

Helen Wilson – Secretary
Graham Burgess – President
Illawarra Branch - National Parks Association of NSW