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5 May 2011

CM020-11

The Planner
NPWS
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Sydney Harbour National Park Draft Plan of Management 2011

The Sydney Coastal Councils Group (SCCG) would like to take this opportunity to provide comment on the *Sydney Harbour National Park Draft Plan of Management* (Draft SHNP PoM). Overall the National Parks and Wildlife Service and Stakeholder Working Group are to be congratulated for producing such a comprehensive document that identifies the values, threats and associated management activities of managing all the sites contained within SHNP.

A number of SCCG have also made submissions on the SHNP PoM and the SCCG supports the issues and recommendations raised in these submissions. In making this submission the SCCG is seeking to provide comments and recommendations that ensure SHNP continues to be a National Park of national and international significance. The attached submission provides comments and recommendations on the following areas:

- Working with Local Government
- Linking the SHNP PoM with other relevant Strategies and Plans
- Finding a balance between recreation and conservation in an urban context
- Responding to the impacts of Climate Change
- Monitoring and evaluating implementation of the SHNP PoM

I trust the information provided in this submission will receive the appropriate attention. If you wish to clarify any matter in this correspondence or require further information, please contact SCCG Senior Coastal Projects Officer, Craig Morrison on (02) 9246 7702 or craig@sydneycoastalcouncils.com.au.

Yours sincerely,

Clr. Wendy McMurdo
Chairperson

1. Introduction

The Sydney Coastal Councils Group (SCCG) would like to take this opportunity to provide comment on the *Sydney Harbour National Park Draft Plan of Management (Draft SHNP PoM)*. Overall, the Draft SHNP POM achieves its goal of providing a framework for the long term management of the broad range of values contained within the park.

The success of the final SHNP PoM will depend on a clear and ongoing commitment to its implementation. For the Parks values to be maintained and threats mitigated the NSW Government, through the provision of the appropriate level of resourcing and support, must assist the NSW National Parks and Wildlife Service (NPWS) in working with the necessary stakeholders to ensure that the final SHNP PoM is implemented and evaluated effectively. The SCCG believes addressing the issues and recommendations identified under the following headings in this submission will result in effective implementation of the SHNP PoM and ultimately the maintenance of SHNP as an internationally recognised icon.

2. Working with Local Government

The Draft SHNP POM recognises that the Park cannot be managed in isolation from the rest of Sydney Harbour. A number of Local Government areas adjoin the park, including the SCCG Member Councils of Manly, Mosman, North Sydney and Woollahra. As adjacent land owners and managers these councils have an ongoing influence and interest in the management of the park in areas including but not limited to:

1. Risks to the park biodiversity (including weeds, rabbits, foxes, fire and stormwater).
2. Integration of visitor management planning, signage and access to the tracks, transport and parking management.
3. Promotion of events and education activities.
4. Events Management of events such as New Years Eve and the start of the Sydney to Hobart Yacht Race as well as local events.

As a result, the NPWS must collaborate via a robust agreement and framework with other public land managers, including Local Government, in a cross-tenure approach with joint projects and integrated planning in a manner that focuses on achieving common management aims. The SCCG believes that this would be best achieved through the ongoing facilitation of an advisory body responsible for addressing issues relevant to the marine, intertidal and terrestrial area of SHNP and adjacent lands. Possible members of such a body could include: the relevant councils, the Sydney Harbour Federation Trust, the NSW Department of Planning and Infrastructure, the North Head Sanctuary Foundation, Sydney Water, Mawlands Q Station and the Australian Institute of Police Management .

<p>Recommendation: The NPWS establish a SHNP Advisory Body responsible for addressing issues relevant to the marine, intertidal and terrestrial area of SHNP and adjacent lands.</p>

3. Linking the SHNP POM with other relevant Strategies and Plans

While the SHNP PoM plays an important role in defining management objectives and actions within the park a number of other statutory and non-statutory plans have a significant impact on the values of the SHNP and the management of adjacent lands. Plans relevant to SHNP include, but are not limited to:

- Environmental Planning Policies prepared under the Environmental Planning and Assessment Act
- The Sydney Metropolitan Strategy
- The NSW Biodiversity Strategy
- Local Biodiversity Strategies
- Coastal Zone Management Plans
- Existing Estuary Management Plans
- Access and Transport Plans
- Precinct plans prepared by the Sydney Harbour Federation Trust
- Sydney Water management of operational plans for North Head Sewerage Treatment Plant

Each of these contains a number of goals and actions related to environmental and heritage conservation as well as recreation in terrestrial and marine environments of Sydney. It is essential that the delivery of such actions within each Plan or Strategy is achieved in a complimentary and coordinated fashion across Sydney. To achieve this, the SCCG recommends that the NSW NPWS in coordination with an Advisory Body for SHNP be responsible for identifying:

1. Actions and their links to other relevant plans and strategies related to environmental and heritage conservation as well as recreation in terrestrial and marine environments of Sydney; and
2. Opportunities to ensure such actions are undertaken by the appropriate land manager and delivered at the optimal temporal and spatial scales.

Recommendation:

1. The NSW NPWS in coordination with an Advisory Body for SHNP be responsible for identifying:
 - Identifying actions in other relevant plans and strategies related to environmental and heritage conservation as well as recreation in terrestrial and marine environments of Sydney; and
 - Opportunities to ensure such actions are undertaken by the appropriate land manager and delivered at the optimal temporal and spatial scales.

4. Finding a balance between recreation and conservation in an urban context

SHNP presents a unique opportunity for residents and visitors of Sydney to demonstrate the conservation of natural, cultural and heritage values in a highly urbanised setting. The impacts of increased visitation need to be met with increased planning and investment to ensure that visitation numbers and provision of the associated infrastructure is managed sustainably and not to the detriment of the Parks biodiversity and amenity.

Following the establishment of the NSW Taskforce on Tourism in National Parks and the stated desire of former NSW Government to investigate tourism opportunities in National Parks the SCCG believes it is important to make three points relevant to SHNP and other National Parks throughout NSW:

- The delivery of commercial activities within the park should not be seen as an alternative to continued and adequate funding provided by the NSW Government.
- Increased commercial and tourism activities will have an impact on land managers adjacent to the SHNP.
- Increased commercial and tourism activities within National Parks should not make visiting any part of a park unaffordable for average residents of Sydney.

The NSW Government must assess the projected cost of implementing the actions identified in the SHNP PoM and allocate funding to the NPWS accordingly. Any revenue raised from additional commercial activities should be utilised to implement additional education and awareness raising activities undertaken by NPWS

If visitor numbers increase significantly as a result of introduced commercial and tourism activities adjacent land managers, such as councils, will need to provide additional services and infrastructure for ancillary services including parking, public transport services. For example Manly Council, at its own cost, caters for large volumes of day visitors, walkers, backpackers, and tourists visiting SHNP from interstate, national and international, locations. Manly town centre provides the bulk of the visitor facilities.

Therefore, the cost of providing services including parking and public transport must be factored into the impact assessment of any proposed commercial and tourism activities. Additionally, the SCCG believes the cost of providing these additional services must be paid for by the operator through their leasing or access arrangements with the NPWS. The provision and fee's through Section 94 of the *NSW Local Government Act* could be a means of facilitating this.

The PoM notes that consultation undertaken by NPWS notes that the “pompadour/ luxury seeker” holiday mindset is significant and increasing in Sydney such that opportunities for boutique accommodation in special places of the national park could capture this market. The SCCG is deeply concerned that a focus on establishing services for the “pompadour/ luxury seeker” will make visiting parts of the SHNP unaffordable to some residents of Sydney. The opposition from the SCCG, Manly Council and community groups including the North Head Sanctuary Foundation to the commercialisation of activities at the Quarantine Station is an example of resistance stakeholders have to the commercial activities within National Parks focused at the “pompadour/ luxury seeker”. Any proposed accommodation must cater for all potential users with a suit of options.

Recommendations:

1. The NSW Government ensure that the delivery of commercial activities within the park is not seen as an alternative to continued and adequate funding provided by the NSW Government.
2. The cost of providing services including parking, public transport, public toilets and accommodation for commercial activities be factored into the impact assessment of any proposed commercial and tourism activities.
3. The cost of providing additional services for commercial activities be paid for by the operator through their leasing arrangement with the NPWS.
4. The NPWS ensure that increased commercial and tourism activities within National Parks do not make visiting any part of a park unaffordable for average residents of Sydney.

5. Responding to the impacts of climate Change

Climate change will have a significant impact on the biodiversity of NSW. In highly urbanised areas, such as Sydney, National Parks present an important asset in maintaining habitat for endemic flora and fauna species as well as providing open space for passive recreation. These values must be maintained and protected from the potential impacts of climate change including sea level rise.

The Office of Environment and Heritage (OEH) (formerly the Department of Environment and Climate Change) commissioned two reports in 2009 on the impacts of sea level rise on Goat Island and Fort Denison. The SCCG recommends the OEH commission similar studies for each of the sites within the SHNP and integrate the findings of these studies into the final PoM.

Additional to an assessment of the impacts of sea level rise on the SHNP an investigation into the potential impacts of climate change on the parks biodiversity is required. This would provide the necessary information to allow for the development and implementation of a framework and investment program that prioritises the necessary research and risk management responses to build the resilience of biodiversity within SHNP and adjacent lands to climate change.

Documents that outline possible methodologies for achieving this include:

- *2004 – 2007 National Biodiversity and Climate Change Action Plan* (Natural Resource Management Ministerial Council 2004);
- *The National Climate Change Adaptation Framework* (The Council of Australian Governments 2006);
- *2007 -2008 NSW Biodiversity and Climate Change Adaptation Framework* (NSW Interagency Biodiversity and Climate Change Impacts and Adaptations Framework 2007); and
- *Implications of Climate Change for Australia's National Reserve System: A Preliminary Assessment* (Department of Climate Change 2008).

Recommendations:

1. The OEH commission climate change impact studies similar to those undertaken for Forth Denison and Goat Island, with additional areas of focus including access, heritage and biodiversity, for each site within SHNP and integrate the findings of these studies into the final PoM.
2. The OEH develop and implement a framework and investment program that prioritises the necessary research and risk management responses to build the resilience of biodiversity and maintain recreational opportunities within SHNP in response to climate change.

6. Monitoring and evaluating implementation of the SHNP POM

Section 4 of the final PoM will summarise and prioritise actions for the management of SHNP. While summarising and prioritising actions is important Section 4 must be underpinned by an assessment of the budget required to implement all the actions and prescribe a time frame for action implementation.

Therefore the SCCG recommends that the NPWS undertake an assessment of the budget and resources required to implement all the actions to be identified in the final PoM. This would assist the NPWS in providing the NSW Government with a clearer indication as to the true cost of maintaining or improving all the values present within SHNP and a clear argument as to why funding the to the NPWS and National Park Management should not only be maintained but increased.

Additionally, an implementation plan detailing how and when the NPWS will ensure the actions identified in the POM will implemented efficiently and effectively is required. Such a plan should be developed in consultation with adjoining land managers and include actions, investment plans and budgets for the following areas:

- Benchmarks
- Key goals/actions
- Timeframes for implementation of actions
- Ongoing monitoring of implementation of the strategies
- Responsibilities and accountabilities
- A transparent process for review and reporting

Recommendations:

1. The NPWS undertake an assessment of the budget required to implement all the actions to be identified in the final PoM.
2. The NPWS develop a SHNP POM implementation plan detailing how and when the NPWS will ensure the actions identified in the PoM will implemented efficiently and effectively.

In Conclusion

Due to the environmental, cultural, heritage and recreational significance of the SHNP it is essential the PoM for the park establishes a framework for the long term management of the broad range of values contained within the park. The SCCG believes implementation of the recommendations below will assist in achieving this and looks forward to assisting in providing ongoing input into the ongoing implementation of the PoM.

SCCG Recommendations

1. The NPWS establish a SHNP Advisory Body responsible for addressing issues relevant to the marine, intertidal and terrestrial area of SHNP and adjacent lands.
2. The NSW NPWS in coordination with an Advisory Body for SHNP be responsible for identifying:
 - Identifying actions in other relevant plans and strategies related to environmental and heritage conservation as well as recreation in terrestrial and marine environments of Sydney; and
 - Opportunities to ensure such actions are undertaken by the appropriate land manager and delivered at the optimal temporal and spatial scales.
3. The NSW Government ensure that the delivery of commercial activities within the park is not seen as an alternative to continued and adequate funding provided by the NSW Government.
4. The cost of providing services including parking, public transport, public toilets and accommodation for commercial activities be factored into the impact assessment of any proposed commercial and tourism activities.
5. The cost of providing additional services for commercial activities be paid for by the operator through their leasing arrangement with the NPWS.
6. The NPWS ensure that increased commercial and tourism activities within National Parks do not make visiting any part of a park unaffordable for average residents of Sydney.
7. The OEH commission climate change impact studies similar to those undertaken for Forth Denison and Goat Island, with additional areas of focus including access, heritage and biodiversity, for each site within SHNP and integrate the findings of these studies into the final PoM.
8. The OEH develop and implement a framework and investment program that prioritises the necessary research and risk management responses to build the resilience of biodiversity and maintain recreational opportunities within SHNP in response to climate change.
9. The NPWS undertake an assessment of the budget required to implement all the actions to be identified in the final PoM.
10. The NPWS develop a SHNP POM implementation plan detailing how and when the NPWS will ensure the actions identified in the PoM will implemented efficiently and effectively.