
RESPONSE TO THE
ROYAL COAST TRACK
STRATEGIC FRAMEWORK
JUNE 2013 BY TRC.

The Spring Gully Protection Group

6th July 2013



INTRODUCTION & BACKGROUND

The Spring Gully Protection Group is dedicated to ensuring the conservation of all the natural bushland in Spring Gully, Bundeena and the integrity and amenity of the Royal National Park, the Spring Gully wetland and the Bundeena catchment area.

The group was formed by Bundeena residents in February 2013 in response to the Scouts placing the 'Boy Scout Camp' bushland property on the market. It partnered with the Foundation for National Parks and Wildlife and submitted a bid to purchase the Scout land at the beginning of March 2013.

A competing bidder, Mr Ron Van Ardenne of RVA Australia Pty Ltd contacted the group not long after to promote his proposed development of the site. The group has held extensive consultations with Mr Van Ardenne and we have concluded that his proposal to develop up-market semi-permanent accommodation is not an environmentally acceptable outcome that the community can support and it poses a substantial threat to the local environment including the wetland (an endangered ecological community), the Bundeena catchment and the integrity of the Royal National Park. This view was put to Mr Van Ardenne on several occasions prior to his purchase. Furthermore, we believe it is probable that there can be no acceptable development on this land that will meet the Rural Fire Service Building on Bushfire Prone Land (2006) controls primarily because (but not limited to):

- Degradation of the threatened species buffer zone as mapped in the Sutherland Shire Council Bundeena-Maianbar Development Control Plan 2006 (SSC DCP 2006) by the proposed one hectare asset protection zone.
- Clearing of the bushland to create an asset protection zone would violate the environmental policy for this property as stated in the SSC DCP 2006.
- The entire property, with the exception of the wetland and creek bed, is located on the loose sandy soiled steep southern slope of spring gully on a gradient of 20 degrees or greater. There is no acceptable solution for the creation of an asset protection zone in the RFS code for special fire protection purpose developments on slopes greater than 18 degrees.

In spite of the community's aspirations that the Spring Gully 'Boy Scouts Camp' land be purchased for conservation and addition into the Royal National Park, RVA Australia Pty Ltd successfully outbid the Foundation for National Parks and Wildlife's offer and the land is now owned by RVA Australia Pty Ltd.

The Spring Gully Protection Group has wide support in the local community. Earlier this year we presented a petition to the state member for Heathcote, Mr Lee Evans, seeking that the 'Boy Scout Camp' land be conserved. The petition received over six hundred signatures. Our email list has approximately two-hundred and forty members who we are keeping informed about the conservation issues surrounding Spring Gully. We are holding a public meeting with the local community on the 17th July and we will continue to hold meetings and consultations with the local community so that we can as best as possible represent the views of the community through our public representations.

A summary of the case for conservation of the 'Boy Scout Camp' land in Spring Gully and comprehensive details about the environmental sensitivity and cultural heritage of Spring Gully are contained in the purchase proposal document. It is available at our website:

http://www.springgully.org/wp-content/uploads/Proposal-to-Scouts%20v03_1.pdf

<http://www.springgully.org>

We offer the following responses to the recently released '**Royal Coast Track Strategic Framework**' published by TRC in June 2013 for your consideration.

As the Spring Gully Protection Group only became aware of the report at the Friends of the Royal National Park meeting of 27 June and we have only had the opportunity to meet once since then to deliberate on its contents, our response has been made at the earliest possible opportunity, today 6th July 2013.

APPROPRIATE ACCOMMODATION OPTIONS

Bonnie Vale

The Spring Gully Protection Group argues that Bonnie Vale is the far superior option for the provision of environmentally suitable “eco accommodation” in the Bundeena area. The area has been habited by European settlement for over one hundred and fifty years yet it provides a beautiful environmental setting nested between the bushland and the sandy shores of the port hacking estuary. It is situated right next to the beautiful bushland surrounding the Cabbage Tree Basin saltwater wetland and the incredible sand spits either side of the mouth to the basin which stretch out into the estuary.

The area has been substantially archeologically surveyed and the heritage was recorded prior to the recent facility upgrade. There would be minimal degradation of the surrounding bushland and wetlands from installing additional accommodation compared to the alternative site mentioned in Spring Gully which would require clearing pristine bushland to create asset protection zones.

All the required infrastructure is already developed and available at Bonnie Vale including:

- Roads accessible by emergency services vehicles including the rural fire service.
- Picnic grounds, BBQs.
- Amenities for campers (showers, toilets and changing facilities).
- Reticulated water supply for campers and in case of bush fire.
- Waste water/sewerage infrastructure.
- Caretaker facilities.

Substantial potential synergies to enhance the visitor experience exist at Bonnie Vale:

- Bundeena Kayaks operates from Bonnie Vale and also provides a shuttle service through the park from here. Visitors can take guided tours, self guided tours and paddle fit classes through Bundeena Kayaks.
- The Bundeena sailing club operates from the shore at Bonnie Vale.
- The camping ground is next to the beach which provides the opportunity to swim in the calm protected waters of Simpsons Bay, Port Hacking.
- Both the Bundeena Service Centre and the Maianbar general store/cafe are within easy walking distance, allowing campers to

easily stroll to the shops to obtain supplies or enjoy a coffee or meal.

- The walking tracks nearby provide short walks around the Basin and into Maianbar (and the general store/cafe).

Creating additional accommodation at Bonnie Vale would be the most financially and environmentally efficient and sustainable use of the public investment already made in the infrastructure at this site.

Boy Scout Camp Land, Spring Gully

As outlined in our introduction, the Spring Gully Protection Group and the local community opposes any development of the pristine bushland in Spring Gully and is concerned about the impact any development would have on the bushland, the wetland, the Bundeena catchment and floodplain and the amenity and integrity of the Royal National Park.

The Boy Scout Camp land is undisturbed bushland. It contains a continuous canopy of Angophora forest, Sydney Sandstone Gully Forest and Sydney Freshwater Wetland (an endangered ecological community). The environmental significance of this property, which forms the headwaters of Spring Gully is recognised by its classification as “riparian land” by Sutherland Shire Council. Most of the block is identified as either endangered species area or endangered species buffer zone in the Sutherland Shire Council Local Environment Plan 2006.

The property is mainly covered by the steep southern side of Spring Gully which runs downhill from the east to west – the most dangerous aspect in extreme bushfire conditions. The land is identified as bushfire prone land and Spring Gully is identified in the 2003 NPWS bushfire management plan as being “very dangerous in extreme bushfire conditions”.

Spring Gully contains many sites of significant aboriginal heritage.

The Boy Scout Camp land is identified by Sutherland Shire council as being of high conservation significance containing riparian land, threatened species zone and threatened species buffer zone. The 2006 Bundeena-Maianbar Development Control Plan contains an environmental policy specific to the property:

“The environmental qualities of the site shall be maintained in any proposal to provide an appropriate facility on this site. In particular the significant tree canopy is to be conserved together with significant understorey.”

There is no acceptable solution for the creation of asset protection zones in the Rural Fire Service Building on Bushfire Prone Land development

controls (2006) for land which slopes greater than eighteen degrees. The Boy Scout Camp land slopes greater than 20 degrees.

The owner of the Boy Scout Camp land has advised us that he proposes to create a one hectare asset protection zone and that a maximum of only 15% of canopy cover would remain and a substantial area of the forest understory would be cleared.

The RFS controls only allow a total of twelve people to be accommodated on the site.

The soil on this steeply sloping land is loose and sandy due to the predominance of remnant cliff dunes on the surrounding ridges, deposited in prehistoric times during higher sea levels.

There is currently no road access to the land. Use of the existing access road onto the council lands for access to the property seems unlikely to meet the RFS requirements for emergency access and evacuation to the property.

It is quite possible that no development can be performed on this land that would meet the bushfire building code let alone be an acceptable environmental outcome.

Summary of the Merits of Bonnie Vale
versus Spring Gully for Accommodation Development

	Bonnie Vale	Spring Gully
Natural landscape outlook	Yes – predominantly bushland, water and picnic/recreational grounds.	No – some bushland views but primary view looks onto the eighteen immediately neighbouring houses and onto the residential areas of Eric St, Bombora Ave, Beachcomber Ave, Bournemouth St and Rymill Place.
Bushfire Risk and Management (NPWS bushfire management plan)	Not within the strategic protection zone and does not require asset protection zone.	Within the strategic protection zone and development requires substantial asset protection zone clearing.
Suitable road access for emergency services.	Yes	No
Existing reticulated water supply in case of bushfire.	Yes	No
Existing sewer and waste water infrastructure.	Yes	No
Requires substantial clearing of undisturbed bushland and loss of habitat.	No	Yes – minimum one hectare to be cleared for asset protection zone.
Limit to number of guests.	More than twelve.	Twelve.
Additional visitor experience opportunities.	<ul style="list-style-type: none"> • Walking tracks. • Proximity to Maianbar shop/cafe and Bundeena Service Centre. • Swimming. • Proximity to Cabbage Tree Basin and sand spits. • Bundeena Kayaks. • Existing Shuttle service. • Sailing, kite surfing, wind surfing opportunities. 	Proximity to coast track and Jibbon Head loop track.
Loss of views and amenity to local residents	Minimal.	Affects residents of eighteen immediately neighbouring houses and the outlook and amenity of residents of Eric St, Bombora Ave, Beachcomber Ave, Bournemouth St and Rymill Place.

BUNDEENA GATEWAY, BEACHCOMBER AVE

Council Lands & Proposed Uses

Regarding the council owned lands we are not aware that there have been any formal consultations with the community regarding the “likely handover” of these lands. We are not aware that there have been any consultations with the local community regarding the draft management plan for the park. We are aware that RVA Australia Pty Ltd is seeking to purchase some of this land for inclusion into the development footprint of its proposed development on the adjoining Boy Scout Camp land. We are aware that RVA Australia Pty Ltd has made representations to council seeking to purchase some of the council owned land. We are also aware that RVA Australia Pty Ltd is planning to extend an asset protection zone onto these lands and is proposing to clear the substantial and dense bloodwood mallee which extends from its property onto the neighbouring council land.

The community is very concerned that the integrity of the bushland and the amenity of the surrounding area is maintained. A substantial number of residences look into these lands and the surrounding national park. Spring Gully acts as an echo chamber and noise from both ends of the gully carries along it. Even the crashing waves on Horderns Beach to the north and the waves crashing on the coastal cliffs to the east can be heard clearly in the gully at night.

While street parking has been an ongoing issue for residents on Beachcomber Ave and Eric St for some time, the fact that National Parks are planning to invest money into developing a car park when they nor the office for Environment and Heritage were not able to even partially financially support the community’s bid to purchase the Boy Scout Camp land for donation to National Parks has certainly raised eyebrows in the local community, including the residents of Beachcomber Ave and Eric St. National Parks can expect a deeply felt scepticism and some community anger over perceptions that a higher priority is being given to tourism infrastructure over the conservation and integrity of the natural environment and the amenity of the Royal National Park. In short, we suggest that there is a high degree of scepticism in the local community over the management of the Royal National Park and the development proposals outlined for the “Bundeena Gateway” particularly if that infrastructure is to be co-opted into a private development that the community opposes.

It is now known in the community that Mr Van Ardenne was referred to TRC and to Mr Mark Willis of National Parks for consultations regarding integrating his proposed development with the developments the TRC

strategic framework document and the park management are also proposing. These consultations occurred at the same time as the local community and the Foundation for National Parks and Wildlife were attempting to negotiate a purchase of the Boy Scout Camp land. It is noted that in section 5.3.3 (p20) of the TRC report the proposed development of the Boy Scout Camp land is identified, seemingly before the land had been purchased by the proposer of the development.

Transport and Parking

Any resident of Bundeena or Maianbar can attest to the fact that the road through the Royal National Park carries a substantial amount of traffic especially during weekends and public holidays. The road is used extensively by joy riding sports car and motorbike enthusiasts whilst shared with many cyclists (both lone cyclists and large groups). The road is dangerous on weekends and public holidays and it is not uncommon for the road to be closed by police due to a serious or fatal accident.

At peak times in recent years the police have closed the roads into the Royal National Park to Bundeena and Maianbar and have operated a road block to block traffic from entering from Loftus, Waterfall and Otford. While residents who can demonstrate they reside in Bundeena and Maianbar have been let through, many visitors have been turned away or have abandoned their trip to Bundeena or Maianbar. This has caused substantial disruption and loss of business to the local business operators including the retail shops, clubs, accommodation providers and tourism operators during peak tourism times.

The Audley weir frequently floods closing the road into the park at Loftus.

Unless the government is willing to commit a vast amount of money to build a bridge at Audley and upgrade the twenty odd kilometres of road between Loftus and Bundeena (such as building a dedicated cycleway) additional vehicle traffic into Bundeena and to the proposed "Bundeena Gateway" should not be encouraged. To do so would invite more accidents and loss of life along the road.

As mentioned in the report public transport services need to be encouraged and supported, perhaps by way of direct subsidies. Perhaps an additional ferry service in the early morning and evening could be subsidised. A privately operated, well publicised, shuttle service between Sutherland and Bundeena would also be a suitable solution.

The practicalities of how a car park would in fact be used needs to be considered also. It is common for visitors to Bonnie Vale to park on the urban streets in Bundeena (and on footpaths and across driveway

crossings) so as to avoid paying the park entrance fee. Developing a car park requiring the payment of an entrance fee will not deter visitors from parking in the street. The only solution to ensuring that visitors park in an orderly manner is for parking on public streets to be monitored by parking enforcement officers as is the case with other high use precincts.

The proposal for signage and “visitor experience” infrastructure should be planned keeping in mind the high risk of vandalism. As an isolated urban community there is a high degree of antisocial behaviour by youth in Bundeena. Signage around the Beachcomber Ave entrance is continually being vandalised. More modern technological solutions to delivering information should be considered. Visitor information should be provided online and designed to be delivered via smart devices (phones and tablets) and promoted by providing QR codes and URLs.

JIBBON HEAD LOOKOUT

The proposal to provide lookout facilities at Jibbon Head must be done with consideration to the very significant aboriginal heritage value of this area. Jibbon Head is an important ceremonial place associated with the “coming of the law” that is associated with the annual whale migration. It is still used in recent times by the traditional owners for ceremony. Les Bursill (OAM), Dharawal historian, archaeologist, anthropologist is a good reference to consult regarding this area and its cultural significance.

CONCLUSION

The Spring Gully Protection Group are available for further consultation and welcome any opportunity to provide further input to the planning surrounding the Royal Coast Track strategy and the development of the proposed replacement management plan for the Royal National Park. We are committed to ensuring the conservation of Spring Gully and the surrounding environment and will continue to consult with the local community and make representations whenever required to ensure our goal is achieved.

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