

## **EcoNetwork – Port Stephens Inc.**

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### **Submission**

#### **Tomaree Coastal Walk and proposed visitor facility improvements for Tomaree National Park, Port Stephens.**

Tuesday, 20 October 2020

EcoNetwork-Port Stephens is a grassroots community-based environmental and sustainability network comprising 26 community and environment groups and eco-businesses with a focus on sustainable planning. We are non-party political and do not donate to political parties.

This submission comments on relevant issues outlined in the Master Plan and Review of Environmental Factors.

EcoNetwork made a submission in September 2019 on the Tomaree National Park Plan of Management - Draft Amendment including the Draft Tomaree Coastal Walk Strategy. We do not propose to repeat the statements in that submission, which is attached as an addendum, except where it may be necessary.

We have received diverse feedback from the community ranging from those who think the Coastal Walk is unnecessary and should be scrapped to those who agree with it wholeheartedly and want it developed to include cyclists. It appears the majority want it to go ahead with changes recommended to preserve visual character, while some are happy for it to go ahead as planned.

In view of the majority wish to preserve visual character, and additional information recently received about the geology and landforms of Stephens Peak, which are similar at Quarry Hill and Green Hill, we have changed our position from that expressed in our 2019 submission, and now question the wisdom of traversing the eastern sides of those hills.

In general, EcoNetwork supports the Coastal Walk because we believe the more opportunity people are offered to experience our natural environment while still managing conservation requirements, the more they will value its conservation, and not just on the Tomaree peninsula.

Nevertheless, we are concerned that the Master Plan does not contain enough detail or modelling to allow a satisfactory community response.

A key issue is the section of walk from Zenith beach around the ocean side of Stephens Peak, where many fear that from the southern viewing platform atop Tomaree summit, the trail will appear as a scar disfiguring an otherwise exquisite natural landform, which is what people climb the summit to see and will now find unacceptable. As the track would pass either through low scrub/brush or over exposed rock faces, it would not be screened by vegetation, which is very different from vegetation on the western side.

However, that fear is overshadowed by a much greater concern – that the south, east and north slopes of Stephens Peak are inherently unstable, making path construction a risky proposition for construction workers and tourists, and should be abandoned. The same concern applies to Quarry Hill and Green Hill, which have identical geology.

For this advice we are indebted to retired geologist Neil Fraser of Shoal Bay who has walked and made a study of the peaks. On Stephens Peak he says there are seven active slope failures (landslides), four on the south slope, one on the east and two on the north, together with a number of historical failures (Appendix 1 for details).

Although examples of proposed track construction are given in the REF Appendix G, there is little information about what the trail will in the end look like and exactly where it will be installed.

Unlike Fraser's report, the REF has not provided detail about the geological active spots and how the design proposed mitigates this major threat. We understand that the safeguards/mitigation measures do not include any requirement to comply with NPWS Landslides and Rockfall Procedures.

Given the lack of detail, we have no choice but to recommend NPWS take the precautionary position and abandon the planned route across Stephens Peak, Quarry Hill and Green Hill, and instead set the route along the existing western side fire trail behind those hills. While significant rehabilitation will be required, with improvements to the Asset Protection Zone, this would be a significantly cheaper option, freeing up resources for other parts of the walk. It would also provide another perspective for walkers including close up views of wildflowers.

### **Proposed site materials**

Regarding budget constraints, we note that 'subject to costing and detailed design/assessment, materials that do not inspire a connection with the mountain are proposed to be removed. For example, red brick paving on Tomaree Headland (page 32)'. The existing red brick path from the base is, apart from the odd easily fixed loose brick, robust and wide enough for climbers in each direction. Replacing this path will be costly and we suggest it be given a low priority compared for example with replacing the narrow stairs and steps, unless and until the path can be confidently replaced within budget.

### **Is new stone bleacher seating necessary?**

We agree with the provision of better viewer opportunities at the Tomaree Summit but are concerned that the indicative design will be too intrusive when viewed from below or

offshore, whereas the existing headland viewing areas are well screened and should be continued. We also question whether new stone bleacher seating on the south summit (p. 53) is necessary given the likely high cost. Also, we understand that the summit precinct is an Aboriginal place of significance and that a stone image of a human form exists at the face, and that there has been lack of consultation with some local Worimi traditional owners about this and other issues.

### **Slot canyon viewing deck**

We support the construction of a safe platform to view this spectacular rock canyon, but question whether it needs such a major installation of two cantilevered platforms (p. 62). This would be very visible from offshore, potentially spoiling the current iconic view of the headlands – the current viewing platforms elsewhere are to some extent screened by vegetation and closely hug the mountain. This principle should be continued, especially given the financial constraints. There seems to be an over-abundance of costly infrastructure planned for Tomaree summit given that it is just one sector of a 20km coastal walk.

### **Summit lookout east**

It is difficult to visualise how this will look and to what extent it will replace the existing lookout as no dimensions are given. We strongly recommend that a new structure is as inobtrusive as possible.

### **Parking**

As mentioned in our last submission, adequate parking will be necessary at key access points, especially at the foot of the walk to Tomaree summit, where parking at holiday time is already most inadequate. The Master Plan indicates an increase in parking to 38, 14 more than currently provided. But even this number seems grossly inadequate given the extra popularity the precinct will attract. While the Master Plan says the Tomaree Lodge precinct is out of scope, the most appropriate location – indeed the only location – for extra parking is the cricket pitch area known as the ‘rabbit patch’. Surely at this stage of planning NPWS needs to negotiate with the Minister responsible for the Department of Communities and Justice about use of the ‘rabbit patch’ for parking. Lack of suitable parking will be a ‘turn-off’ for many prospective walkers.

We note extra parking indicated for Box Beach, Big Rocky and Pacific Avenue, but there is no modelling to indicate if it will be adequate. Over recent school holiday weekends traffic has been gridlocked in Anna Bay so more parking will not solve the situation. Clearly alternatives are required.

We recommend an augmented public transport system be facilitated as soon as possible as noted in REF Appendix C pp 681, in conjunction with Port Stephens Council. Noting the lead of the Noosa Shire Council, free bus use if offered throughout the precinct in the busiest times would lessen the need for increased carparks for which space is not available. As SECA noted suitable services could also enable return links on one-way sections, enhancing visitor use.

### **Fishermans Bay**

We have received negative feedback from residents of Fishermans Bay about impacts of the proposed route passing close to existing homes. However, as there appear to be no direct environmental impacts (apart from the possibility of litter) we do not propose to comment, unless NPWS changes its mind and diverts into bushland. We note in the REF that 'the limited road access to Fishermans Bay would not make this a suitable location for large visitor numbers. This is not being promoted as a key access to the walk' (Technical Design Note by SECAsolution).

### **The Wetland Walkway**

Though unfunded, this is another example where there is insufficient detail in the REF regarding track placement and design detail, yet approval of the REF may potentially enable future development of this boardwalk. These wetlands are thought to exist due to the perched nature of the water table and substantial engineering works would be required to construct a track through this undisturbed area – not justifiable in terms of either environmental impacts or cost. We find it unacceptable without further design detailing and consultation.

While the potential for a link to the Koala Sanctuary possibly avoiding Samurai Beach and nudist bathing seems desirable, the impact on a pristine wetland, possibly one of the most significant in Tomaree to the extent shown is not acceptable. Surely there are less impactful links.

### **Review of Environmental Factors**

The proposed activity will see 8.6ha of vegetation, including 6.1ha of native vegetation, removed to construct new track sections. This would seem to be an acceptable impact given the 20km walk length.

In its biodiversity assessment, the REF identifies 2 threatened ecological communities, 4 threatened flora species and 12 threatened fauna species and considers that potential impacts are not likely to be significant. We would agree provided NPWS follows its guiding design principles, mitigation measures and construction methods to avoid and minimise biodiversity impacts.

In its threatened entity evaluations (Appendix E, p.573), fauna and flora species are listed and rated in terms of likelihood of occurrence and whether there is potential for impact. Where there is a high likelihood of occurrence and potential for impact it says an assessment of significance (AoS) is undertaken, but it is not clear what this actually means, nor are the outcomes of the AoS seemingly reported meaningfully to community.

We note however, the safeguard/mitigation measures for one of the four threatened species directly impacted, *Cryptostylis hunteriana*, the Leafless Tongue Orchid (REF number p113, actual p116, and p115, actual p118). Here one tiny population of apparently four known populations in the park is directly in the build impact zone and we urge extreme care be taken. It is difficult to comprehend how stairway decommissioning and rebuild by contractors can avoid compacting the soil here or damaging the banks

near the current stairway. If successful however, the widened stairway will provide additional protection to this population which is subject currently to trampling with cross-cutting.

We question whether the REF provides an adequate assessment (or even meets the statutory requirements for such reviews). Given the lack of detail in the REF about the design or materials for specific sections of the path, it is impossible to make a sensible assessment of the environmental impact, e.g. whether a particular section will be visually intrusive or adversely affect adjacent flora and fauna. We understand that options for specific designs have been left open at this stage, but in our view, it will be necessary to conduct a further REF, or other form of environmental impact study, once options have been narrowed and choices made.

### **Conclusion**

Because of likely scenic intrusions and inherent instability, we recommend that plans to run the Coastal Walk across the eastern face of Stephens Peak, Quarry Hill and Green Hill be abandoned and instead focus on upgrading the existing fire trail behind those hills and using it for the path. Lack of suitable parking will be a 'turn-off' for many prospective walkers, especially at the foot of the walk to Tomaree summit. Finally, given the lack of detail in the REF about the design or materials for specific sections of the path, it is impossible to make a sensible assessment of the environmental impact. Once options have been narrowed and choices made, a further REF may be necessary



Nigel Dique  
on behalf of EcoNetwork-Port Stephens Inc.

## Appendix 1

On the south slope of the peak there are four active slope failures within a zone failure over 200m long. These are indicated as A, B, C, D in **Table 1** below. There are also at least four historical slope failures within this zone (see **Figure 1**). On the east slope of the peak there is an active slope failure (E) and two active slope failures on the north slope (F, G). The dimensions of these failures are estimated from satellite imagery and summarised in the table.

Failure	Dimensions	Debris	Photos
<b>South Slope</b>			
A	25 m x 15 m	Predominantly soil	Figure 1, Figure 3
B	8 m x 4 m		
C	25 m x 10 m		
D	15 m x 12 m		Figure 1, Figure 4
<b>East Slope</b>			
E	80 x 10 m	Predominantly rock	Figure 2, Figure 5
<b>North Slope</b>			
F	20 m x 5 m	Predominantly rock	Figure 2, Figure 5
G	100 m x 18 m		

Fraser notes that the debris from failures A, B C and D is predominantly soil and from failures E, F and G predominantly rock. The toe of Failure D has reached the gully between Stephens Peak and Quarry Hill where it is being eroded by water flows during periods of high rainfall, which will result in continued future movement of this failure. Debris from failure E has reached the ocean and includes blocks up to 5m in length. Debris from failures F and G has reached Zenith Beach a similar slope failure is present on Tomaree Head at the north end of Zenith Beach. These slope failures are rotational landslides induced by saturation of the slopes during periods of high rainfall.

According to Fraser, construction of tracks across these slopes enhance access for rainwater into the ground and produce additional failures or remobilize existing failures. As well as damaging the environment, failures would constitute significant risk to the safety of track construction workers and users. Additional slope failures would badly disfigure an otherwise scenic landscape.

As the geology and landform of Quarry Hill is identical to Stephens Peak it is probable that construction of tracks across the slopes of this hill would also induce slope failure.

Fraser recommends as does EcoNetwork that in view of his analysis plans for tracks across the eastern slopes of Stephens Peak and Quarry Hill should be abandoned.

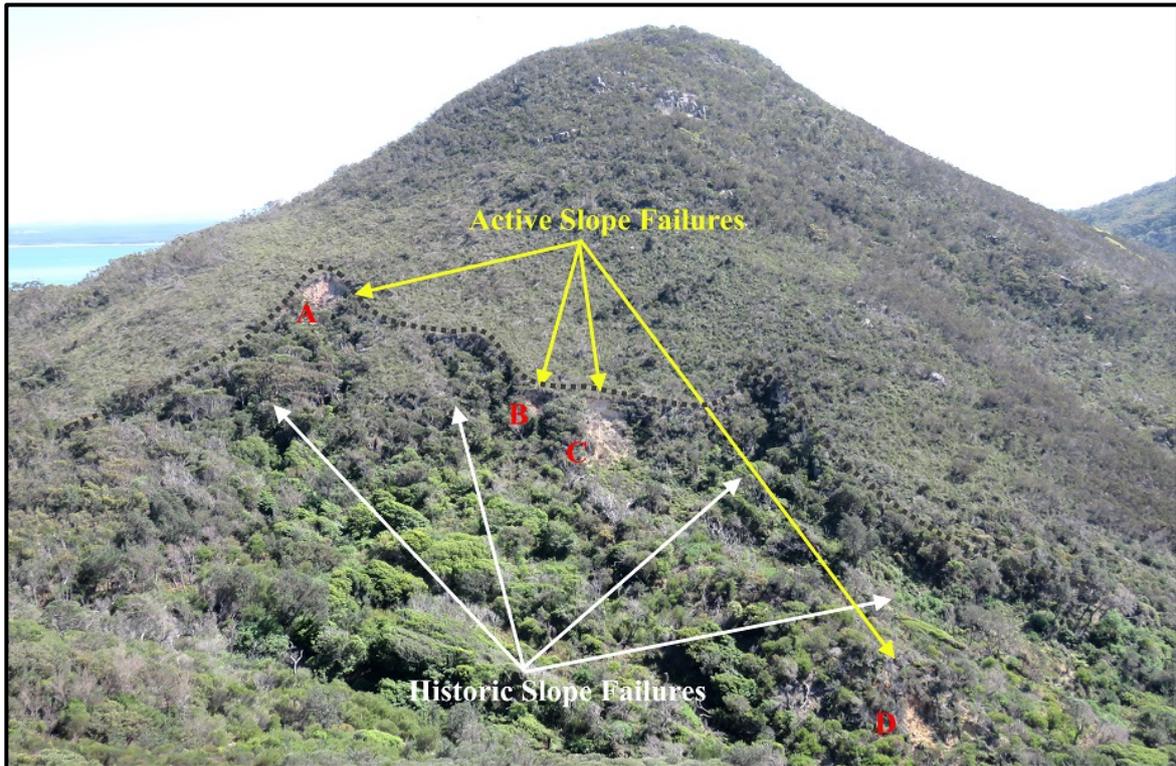


Figure 1. South slope of Stephens Peak showing instability zone with four active slope failures (A, B, C, D) and several historic slope failures.

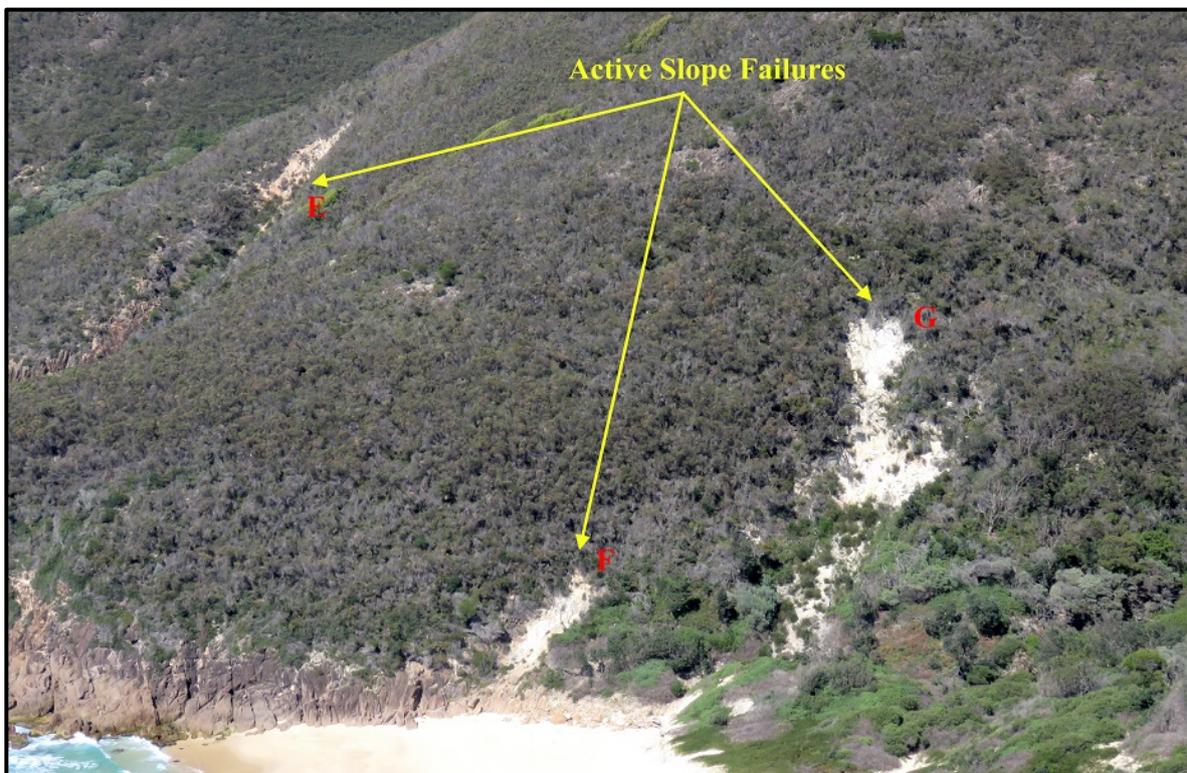


Figure 2. North and east slope of Stephens peak showing three active slope failures (E,F,G).



*Figure 3. Slope failures, A (left), B and C (right) on the south slope of Stephens Peak.*



*Figure 4. Slope failure D on the south slope of Stephens Peak*



Figure 5. Stephens Peak slope failures: E (left) on the east slope, F (centre) and G (right) on the north slope.

## Appendix 2

### EcoNetwork – Port Stephens Inc.

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30/9/2019

#### SUBMISSION

#### **Re: Tomaree National Park Plan of Management - Draft Amendment including the Draft Tomaree Coastal Walk Strategy**

EcoNetwork-Port Stephens is a grassroots community-based environmental and sustainability network comprising 25 community and environment groups and eco-businesses with a focus on sustainable planning. We are non-party political and do not donate to political parties. The comments that follow relate mainly to environmental aspects of the proposed Tomaree Coastal Walk.

EcoNetwork in principle supports the Tomaree Coastal Walk as set out in the Plan of Management Draft Amendment. We believe that nature walks if they are largely unobtrusive and sensitively planned to minimise environmental impacts, can be ecologically sustainable while benefitting the local and wider community.

- They connect people with the natural environment in a uniquely personal way.
- The experience provides an appreciation of the value of the natural environment that might be otherwise be out of reach
- Such an appreciation is vital to generating support for conservation per se and protection of native habitat
- Making it easy to access spectacular views and flora including wildflowers is likely to encourage walkers to stay 'on trail' and reduce the likelihood of some making their own routes through the bush with resulting negative impacts.

### **Native fauna and flora**

Among species encountered on or near the Tomaree Headland summit walk, and which are very likely to inhabit the proposed walk corridor are echidnas, diamond pythons, koalas and lace monitors, and of course many bird species. In relation to flora, apart from eucalypts, there are abundant species including Eastern Myall Wattle found in the southwest slopes, and Bracken Fern on the lower slopes and flourishing in the gullies of remnant soils. Umbrella Palm can be seen from walkways on the lower west and south west slopes. Further south on existing walking tracks rare orchids including the Tomaree Orchid may be encountered. We recommend consultation with the Port Stephens Walking Group, who know the location of these orchids. Construction of the walk needs to be done in a manner that minimises disturbance to native animals and flora.

A stated objective of the Tomaree Coastal Walk is to “provide a signature walking experience with part, single and multi-day walking opportunities...” To this end, feeder trails and links enabling **circular paths** could be included and shown in the Strategy and the proposed Master Plan. Circular paths would allow walkers to be less reliant on pickup and set down points. For example, an upgrade to existing trails on Tomaree Head and the connection to the Shoal Bay foreshore at the northern eastern end could allow for a one-way circuit trail connecting the Summit from the point where it departs the red brick path, should be feasible economically and environmentally. We acknowledge that the current trail is narrow creating considerable cross-cutting though our casual observations that is predominately by runners. If the current trail was retained at existing width, permitted in one direction only and cross cuts rehabilitated, would another new path to complete the circuit be possible? Having the summit component as a circuit rather than an 'up and retrace', would reduce congestion between head-on groups and improve the visitor experience.

The proposed walk passes coastward to the treatment plant at Boulder Bay. We recommend retaining the existing access link from Boulder Bay Road to Big Rocky (which passes through sections of macrozamia), enabling this popular section of the walk to be undertaken as a shorter walk, linking to form part of a circular walk. Several circular link opportunities exist between Shoal Bay and the Big Rocky track that could be identified to complement the project [Western Australia's Cape to Cape Track although a much longer

trail, incorporates many circular walks identified in a book “Walking in Circles”]. A walking link from the 2WD carpark at the southern end of the Big Rocky 2WD track could be included. While the proposed wetland walk may link to various carparks, existing informal walk tracks on the eastern side of the 4WD track (currently featuring a 4WD barrier) should be signposted.

Where circular tracks are NOT possible, we recommend that information on the proposed trail identify where existing Port Stephens bus routes can be used for pick up and set down opportunities. For example, walkers commencing at Tomaree Head and exiting at Box Beach or Fingal Bay could connect with the bus that routes along Tomaree Road and Marine drive. This strategy reduces the need for additional parking: An extra 500m - 1 km is not a problem for walkers. The bus also links at Boat Harbour, and a new link walk track from Birubi SLSC through the park near the Gan Gan Road Beach Access would enable bus links at this end point of the Coastal Walk.

### **Wetland**

The potential for a boardwalk associated with the wetland area, while out-of-scope, has been identified in this strategy. While this would bring an additional visitor experience to the area, and opportunities to link with the Koala Sanctuary and Treescapes, it would be better to avoid impacting an area of landscape that seems not to have existing intrusions. While out of scope, the wetland at the rear of Shoal Bay has several old vehicle tracks which could be enhanced with boarding in some wet areas to bring a wonderful additional experience for locals and visitors wanting a short and predominately shady walk near town and beach.

### **Sand hills**

We are concerned that where a walk corridor traverses a sand hill (such as between Box Beach and Fingal Bay) that it does so without damaging dune vegetation and grasses that act to stabilise dunes. We recognise that NPWS will take contours into account, but we are not totally convinced of the need to traverse dunes. While sand trails can be very scenic and a great experience, our preference would be for the trails to be set in forested sections and avoid sand except in rare instances.

### **Aesthetics**

One objection raised against the proposed walk is that it will ruin otherwise pristine views of hills such as Stephens Peak and Quarry Hill, especially from the summit of Tomaree Head, by creating a scar across the landscape. However, they are distant views, limited in perspective and what may be seen will depend on the type of construction, the width of the trail and the extent of the canopy. For example, except for a small section of metal walkway near the top, the existing walk up Tomaree Head can hardly be seen from western Shoal Bay – we would hope that the proposed walk is similarly unobtrusive.

### **Parking**

Parking will be a key issue at walk access points and the Plan of Management Draft Amendment mentions that NPWS will liaise with Port Stephens Council about car park upgrades. However, one area needs special consideration and that is parking near the entrance of the main walking track to the summit of Tomaree Head. The plan mentions that around 200,000 visitors use this track each year. Once work has been completed on the walk visitor numbers can be expected to further increase. Furthermore, tour companies are likely to include the walk as part of their offerings. This raises the question of parking for coaches as well as private cars. At present parking is woefully inadequate even for current numbers. The best solution is to have the grassed area (locally known as the rabbit patch) at the vehicular entrance to Tomaree Lodge adjoining the start of the walk to be opened up for parking. Obviously, this will require agreement by Communities and Justice, should that department continue to have jurisdiction over the Tomaree Lodge precinct. By the time the Coastal Walk is completed Tomaree Lodge will have been vacated (the remaining residents are scheduled to be transferred to group homes by December 2019). Access to the 'rabbit patch' can be provided via a side entrance after moving the boom gate further east along the roadway. The likelihood of extensive patronage will require a hard surface to be constructed. Who will pay for this? Maintenance of this car park and others at the various access points will require close cooperation with Port Stephens Council.

Other entry locations requiring attention include Box Beach, Barry Park, Fingal Bay SLSC (highly congested at holiday time), One Mile (may need hard surfacing), Boat Harbour, Fisherman's Bay (on-street only) and Birubi (very congested). Also, if there is to be a Wreck Beach access point the only parking currently available is on-street.

### **Helicopter flights to Fingal Island**

The draft amendment makes mention of the possibility of helicopter flights to Fingal island as part of a licensed commercial activity. Although not part of the proposed coastal walk, we would like to comment as follows: we are not convinced about the value of helicopter flights to Fingal Island because they introduce a noisy element of commercialisation that will benefit relatively few visitors to the area. The Fingal spit undergoes washouts from time to time, preventing access by foot to the Island and lighthouse. However, it has always been known to recover, and when it does, provides at low tide safe access from Fingal Bay beach.

### **Signage**

Interpretive signage will play an important part in making the walk more meaningful in terms of whale watching and identifying local flora and fauna (especially threatened species like sea eagles and oystercatchers), geography, geology, Aboriginal middens and remnants of military history. We suggest NPWS investigate the following:

**The story of our volcanic coast and ancient lava fields**, understood to date back more than 14 million years. These are evident along the coast from Tomaree Headland to Birubi Point in the form of rocks of rhyolite granite or what is known to geologists as ignimbrite with andesites among other strata. Where vents have breached the earth's crust molten lava has formed cones, one of which is now barely visible on Samurai Point between One Mile and Samurai Beaches. Ancient lava fields with dykes can best be appreciated at Morna Point at low tides.

**History of sea level rise and fall**, accompanied by local sand dune formation around 17,000 years ago, followed by colonisation by vegetation communities and formation of wetlands.

**Notable shipwrecks** – more than 20 have been recorded on the proposed walk coastline. The most notable are: SS Oakland (28.5.1903) north east of Cabbage Tree Island – 12 crew die; SS Macleay (11.10.1911) southeast of Little Island- 15 crew die; SS Cora Lynne (16.11.1914) Wreck Beach; SS Pappinbarra (11.9.1929) Point Stephens (Fingal Island); SS Wallamba (11.7.1923) Morna Point; Barque Olmara (27.9.1903) Birubi Point. There are the unmarked graves of around 12 shipwrecked seamen noted at the Birubi Point Heritage Cemetery. Other wrecks include the SS Thordis (4.3.1906) on Yacaaba Headland.

### **Military remnants**

The gun emplacements, radar platform and other military structures identified on the Tomaree Headland summit walk are only part of what is in reality a large open-air military museum on the Tomaree Lodge peninsular. The torpedo tubes platform, Hotchkiss cannon fort and WWII Heritage listed lodge buildings should be included in the story, even though they are not on NPWS land. Ideally there needs to be an interpretive centre, perhaps located within the lodge and while this may be outside the purview of NPWS, we feel there needs to be some engagement with the lodge site management otherwise the narrative will not be complete.

### **Further consultation**

Computer modelling would assist the community in forming an opinion on potential impacts. We acknowledge that the Master Plan will provide more detail for community consultation. It would be useful for the Interpretation Plan to be similarly available.

### **Conclusion**

EcoNetwork in principle supports the Tomaree Coastal Walk. We believe that nature walks if they are largely unobtrusive and sensitively planned to minimise environmental impacts, can be ecologically sustainable while benefitting the local and wider community. In terms of accessibility, we recommend that where possible circular walks be factored in for the sake of walker convenience. Where this is not possible, walkers should be advised how they link with Port Stephens bus routes. Given the plans for Tomaree Head, local

parking is likely to be a major issue and the grassed area (locally known as the rabbit patch) at the vehicular entrance to Tomaree Lodge should be opened up for parking. Finally, signage should take account of our volcanic coast and ancient lava fields, and notable shipwrecks.



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