



NSW NATIONAL PARKS & WILDLIFE SERVICE

Unicorn Falls Draft Master Plan

Submissions Summary



© 2020 State of NSW and Department of Planning, Industry and Environment

With the exception of photographs, the State of NSW and Department of Planning, Industry and Environment are pleased to allow this material to be reproduced in whole or in part for educational and non-commercial use, provided the meaning is unchanged and its source, publisher and authorship are acknowledged. Specific permission is required for the reproduction of photographs.

The Department of Planning, Industry and Environment (DPIE) has compiled this report in good faith, exercising all due care and attention. No representation is made about the accuracy, completeness or suitability of the information in this publication for any particular purpose. DPIE shall not be liable for any damage which may occur to any person or organisation taking action or not on the basis of this publication. Readers should seek appropriate advice when applying the information to their specific needs.

All content in this publication is owned by DPIE and is protected by Crown Copyright, unless credited otherwise. It is licensed under the [Creative Commons Attribution 4.0 International \(CC BY 4.0\)](#), subject to the exemptions contained in the licence. The legal code for the licence is available at [Creative Commons](#).

DPIE asserts the right to be attributed as author of the original material in the following manner: © State of New South Wales and Department of Planning, Industry and Environment 2020.

Cover photo: Unicorn Falls, Mount Jerusalem National Park. Dean Trezise

Published by:

Environment, Energy and Science
Department of Planning, Industry and Environment
Locked Bag 5022, Parramatta NSW 2124
Phone: +61 2 9995 5000 (switchboard)
Phone: 1300 361 967 (Environment, Energy and Science enquiries)
TTY users: phone 133 677, then ask for 1300 361 967
Speak and listen users: phone 1300 555 727, then ask for 1300 361 967
Email: info@environment.nsw.gov.au
Website: www.environment.nsw.gov.au

Report pollution and environmental incidents
Environment Line: 131 555 (NSW only) or info@environment.nsw.gov.au
See also www.environment.nsw.gov.au

ISBN 978-1-922493-84-2
EES 2020/0566
December 2020

Find out more about your environment at:

www.environment.nsw.gov.au

Contents

Introduction	1
Background	2
What was proposed	3
Why the proposed visitor infrastructure?	3
Consultation process	4
Overview of public exhibition responses	5
1. Parking, roads and traffic	6
2. Scale and location of visitor facilities	9
3. Protecting environmental values	12
4. Impacts on natural amenity	14
5. Park management and compliance	15
6. Risk and safety issues	16
7. Economic and nature tourism opportunities	17
8. Cultural heritage values	19
9. Neighbour amenity and community wellbeing	20
10. Education and interpretation	21
Management response	22
Next steps	23
Further detailed planning and assessment processes	23
Continuing community engagement	23

List of figures

Figure 1 Location map – Unicorn Falls in Mount Jerusalem National Park	2
Figure 2 Promotion of the master plan public exhibition	4
Figure 3 Analysis of submissions	5

Introduction

The NSW National Parks and Wildlife Service (NPWS) is undertaking nine projects as part of its visitor infrastructure program which aims to increase nature-based tourism in New South Wales, boost regional visitor economies and improve community wellbeing.

The Tweed Byron Hinterland Trails, a multi-day walking track route, linking Tweed Shire, via Mount Jerusalem National Park, to Minyon Falls in Nightcap National Park, is one of these nine projects. The signature walk from Unicorn Falls, near the village of Uki, to Minyon Falls will bring economic benefits to local communities and improve recreational opportunities within the Tweed and Byron local government areas.

Other infrastructure projects include the Royal Coast Track, Sydney Harbour Scenic Walk, Snowies Iconic Walk and the Light to Light Walk in Ben Boyd National Park.

To enable the delivery of the Tweed Byron Hinterland Trails project, Amendments to the Tweed Caldera Plan of Management were required.

A major focus of the amendments, which were adopted by the Minister in late 2019, allows construction of walking tracks and linkages to create a multi-day walking track route that will also expand day walk opportunities.

The amended plan specifies that four separate master plans be developed that will provide detailed information for different precincts on the multi-day walking track route. The Unicorn Falls master plan is the second of these plans. The first, the Minyon Falls master plan, was placed on public exhibition in 2019. The third master plan, for the multi-day walk and campsites, will be exhibited in late 2020/early 2021.

Public exhibition of the master plans provides an opportunity for members of the community to comment on the proposed developments.

This report summarises the community feedback received on the Unicorn Falls master plan during the public exhibition period and outlines the NPWS response.

Background

Unicorn Falls is located approximately 15 kilometres south-east of the village of Uki on South Chowan Road within Mount Jerusalem National Park.

As outlined in the Tweed Caldera Plan of Management (PoM) amendments, the draft master plan proposed to:

- develop a day use area at Unicorn Falls, on Chowan Creek, South Chowan Road, in Mount Jerusalem National Park – Section 3.2.2 *Day Use Area*
- develop a camping area next to Manns Road, just over one kilometre to the north-west of Unicorn Falls – Section 3.2.3 *Camping Area*.

The Unicorn Falls master plan (draft) presents a picture of planned visitor infrastructure improvements for both the day use area at Unicorn Falls and the camping area, including site plans and diagrams. The master plan also guides preparation of necessary environmental impact, cultural heritage, safety, social, financial and engineering assessments.

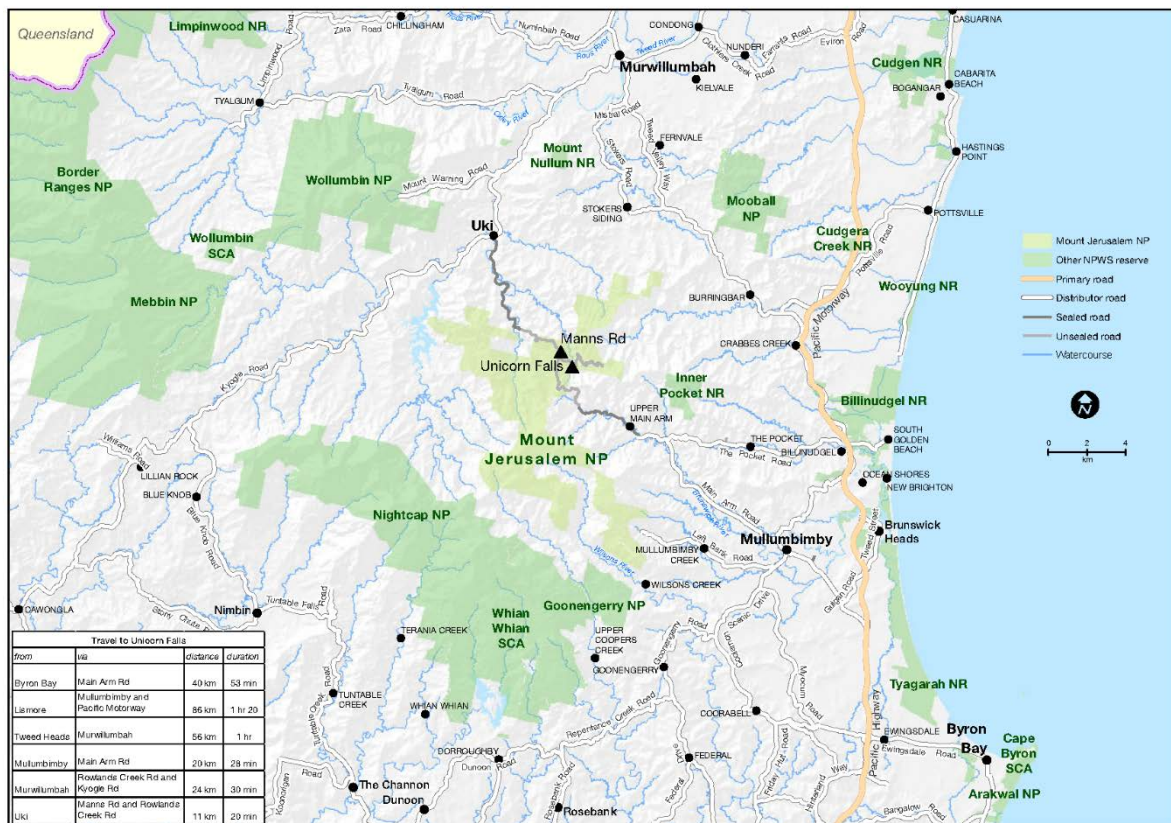


Figure 1 Location map – Unicorn Falls in Mount Jerusalem National Park

What was proposed

Day use area at Unicorn Falls

The proposed day use area at Unicorn Falls would serve as the trail head and drop-off point for the Tweed Byron Hinterland Trail, a three-night/four-day hiking trail that finishes 45 kilometres to the south at Minyon Falls in Nightcap National Park.

As well as acting as the trail head for the walk, the proposed day use area would act as the northern visitor hub with the provision of basic facilities on South Chowan Road for day visitors to enjoy the falls and surrounding rainforest.

The proposed development would feature parking for seven vehicles, visitor information, picnic tables, BBQs, a toilet, and formalised access to the waterfall with steps to the base of the falls. A parking bay would allow commercial operators using a small minibus to drop off walkers for the multi-day walk.

Camping area next to Manns Road

As part of the multi-day walking track network, the master plan enables development of a camping area adjacent to Manns Road, near Unicorn Falls.

The proposed campground provides for seven low key campsites for visitors and walkers campsites, three of which are drive-in and four where campers will need to carry their equipment up to 20 metres. The facility also incorporates car parking, toilets, picnic tables, BBQs, an information shelter and a walking track to the waterfall. New walking tracks will link the camping area to Unicorn Falls (approximately one kilometre away) and the Whiskey Creek Trail (approximately 200 metres away), providing connections to the multi-day walking track network.

Why the proposed visitor infrastructure?

Unicorn Falls day use area

There are currently no facilities provided at the Unicorn Falls site and parking is restricted to several informal bays on South Chowan Road.

There are no formal paths and visitors often walk across the top of the falls to get to the pool below, creating a slip hazard. The steep descent to the pool has also led to erosion and presents a safety hazard. There is evidence of trail bike riders riding through the creek above the falls and the proposed picnic area, which is degrading the natural values of the site.

The proposed works aim to protect the natural and cultural values from the impact of the informal visitation which is currently occurring.

Camping area next to Manns Road

Currently, there are no camping facilities in Mount Jerusalem National Park. The proposed campground on Manns Road would provide a new recreational opportunity for the local community and would allow users of the trail to stay overnight before commencing their journey if preferred.

Consultation process

NPWS sought community input to the Unicorn Falls master plan to refine its vision in advance of the detailed design and final approval stages.

Public exhibition of the Unicorn Falls master plan from Friday 12 June to Monday 13 July 2020 provided members of the community with the opportunity to comment on the proposed visitor infrastructure.

The Unicorn Falls master plan was made available online, and at the following NPWS offices:

- Murwillumbah – 1/135 Murwillumbah St, Murwillumbah NSW 2484
- Byron Bay – Tallow Beach Road, Byron Bay NSW 2481.

Notification of the public exhibition was sent to over 250 stakeholders, included those listed on the Tweed Byron Hinterland Trails register of interest, and widely promoted through local media, social media and posters.

National Parks and Wildlife Service (NPWS) has comprehensively reviewed all submissions and considered the community feedback and comments.

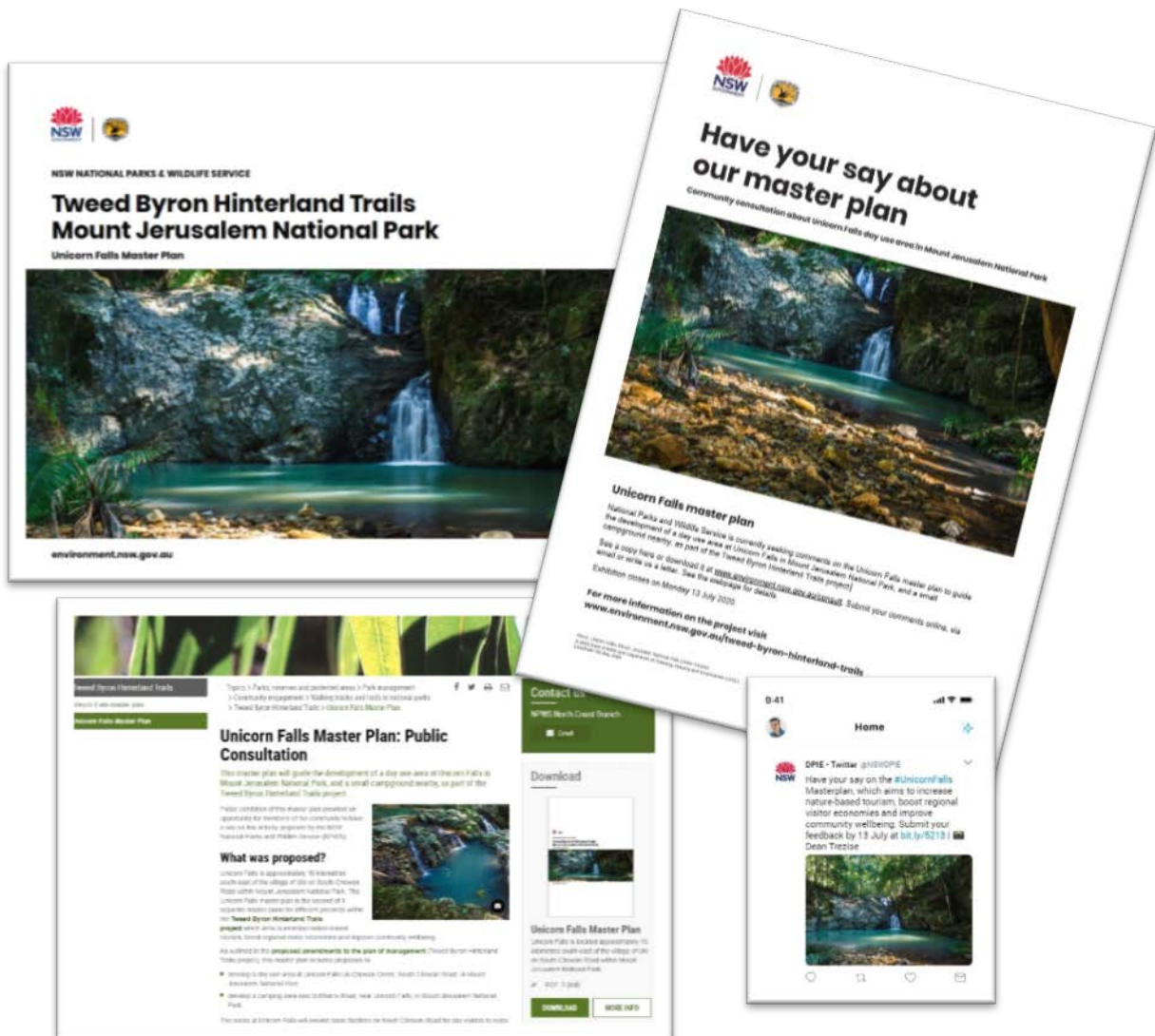


Figure 2 Promotion of the master plan public exhibition

Overview of public exhibition responses

We received 49 submissions from a range of stakeholders, including individuals, local residents, business operators, other government agencies and non-government organisations, Aboriginal organisations, park users and environmental groups.

Two other individuals registered their interest in the master plan to receive updates but did not provide comment.

Submissions were received from 39 individuals and family groups and 10 were identified as being from organisations.

Over 160 separate issues were raised in the submissions. These have been categorised in this submissions report under 10 key themes:

Theme	Number of submissions
Traffic, roads and parking	35
Scale and location of visitor facilities	28
Protecting environmental values	22
Impacts on natural amenity	21
Park management and compliance	17
Risk and safety issues	11
Economic and nature tourism opportunities	9

How submissions were analysed

All submissions were recorded, the points raised in submissions analysed, and a decision made about how to group points into themes. Points and themes were then considered against criteria to see if a change to the plan was needed. This process is outlined below.

Analysis of submissions

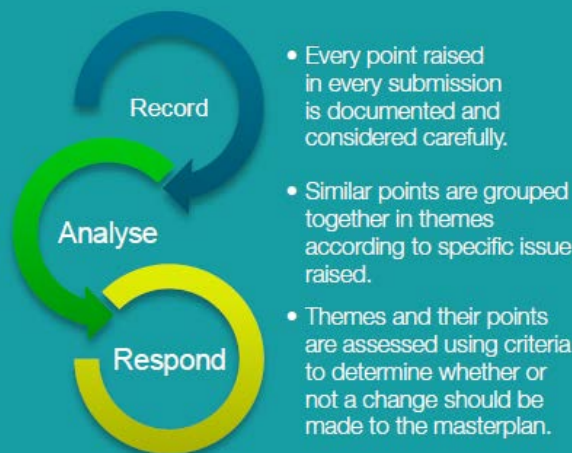


Figure 3 Analysis of submissions

1. Parking, roads and traffic

A large volume of submissions raised concerns about accessing the precinct and traffic congestion given the expected increase in park visitation and the flow-on impacts to roads and parking especially given the constraints of the two sites. Road maintenance was also raised as an issue together with its intrusion on native vegetation.

Parking and turning spot

Numerous submissions suggested that the proposed seven parking spaces for the day use area and trail head would be unlikely to adequately service the trail. (Submission 1, 30, 34, 37). This would result in undesirable and potentially unsafe overflow parking along the narrow, unsealed roadway, where it is difficult to turn around (Submissions 1, 26, 27, 31) and would result in an encroachment on roadside vegetation at peak times (Submissions 26 and 34).

- It is already not uncommon for 20 vehicles to be in the vicinity at any given time, parked illegally and impeding access (Submission 43).
- We cannot understand how two to three additional vehicle spots could be considered adequate when we already know the site is unable to carry the high volume of vehicles accessing the site on a regular basis (Submission 43).
- If day visitors cannot park safely at Unicorn Falls it is likely they will seek parking places along the narrow and steep South Chowan Road, to the detriment of the roadside vegetation' (Submission 26).
- Seven car spots will fill up in no time and when full to capacity and beyond, turning around will be impossible and day users in search for parking will have to keep going up the hill to find a turning spot, again, in unsuitable cars, and, once up Mount Chowan, might try to keep going towards the skyline fire trail, which will end up in disaster (Submission 27).
- If promoted as trail head for the Tweed Byron Hinterland Trail, parking is inadequate as not all users of the multi-day walk will choose to be transported by a commercially operated minibus (Submission 31).
- Seven parking spaces is inadequate at Unicorn Falls to promote the full benefits of the trail in a sustainable manner. Discouraging multi-day hikers from utilising the Unicorn Falls facilities (due to lack of parking) has the potential to fail in promoting the full benefits of the trail for the communities around the Tweed (Submission 44).

Alternate options and suggested solutions presented in submissions included:

- Constructing a generous car park with overnight stay at Manns Road with enough capacity to accommodate long term parked vehicles left by Minyon Falls trekkers.
- Creating an inviting track to Unicorn Falls, access to Clay Pot Road from there via Whiskey Creek and on from there to the bottom of Hells Hole falls along the creek or Hells Hole via Middle Ridge Trail and Sandridge Road. This will be too long for young children to reach Hells Hole, therefore much safer with lots of safe swimming holes along the creek on the bottom.
- Providing other alternate means of transporting people to and from Murwillumbah or Uki, especially for the hinterland trail, in addition to the provision for a commercial minibus operator. (Submission 1).
- Closing South Chowan Road to the public.

NPWS also recognised that views varied on the provision of minibus parking.

Those opposed suggested that the use of commercial minibuses to transport people in and out of the site would be alarming for residents and fauna populations (Submission 8) and would encourage loads of tourist to inundate a peaceful place (Submission 29).

Other submissions supported the proposal to provide minibus parking and went further by suggesting additional road infrastructure be provided, including:

- A turn round area for a minibus with a trailer or a reversing bay for business interested in offering transfers to multi-day hikers or e-bikers. (submission 28).
- Parking for a trailer and group camping area (to allow for a group e-bike out to the falls, camp overnight then they do multi-day walk and business take all bikes back to mullum). (submission 28).

Roads

One submission did not support the proposal to increase parking or formalisation of a car park or use of proposed gravel pavement (vehicles) as shown in Plan 4.1.

- We have major concerns with the movement of gravels during heavy rain events, potential impact on water quality, excessive and unnatural sedimentation, impact on aquatic habitat, replacement of lost gravel and ongoing maintenance costs (Submission 43).

Other submissions raised concerns about vehicle access and site constraints. For example, one submission pointed out that once past the current informal parking area, vehicles must travel a further 1.2kms uphill to find the closest and safest (informal) turnaround point at the junction of South Chowan Road and Pearsons Trail.

- Because South Chowan Road either side of Unicorn Falls is narrow and cut into the side of a steep slope it has sheer verges on either side and is prone to slip following heavy storms. This can be seen by a 30 metre recovering slip site on the top side of the road 600 metres uphill from the falls. Rugged terrain, close encroachment of vegetation and narrow road make it unsuitable for widening and potential turnaround until 2.2kms past the falls where the road widens and a turnaround bay could be considered (Submission 43).

Another submission suggested opening up some sections of bush trail parallel to Manns Road for use by horses to avoid conflict with increased motor vehicle traffic (Submission 42).

A number of submissions raised concerns about the adequacy of current road maintenance with one suggesting the need for government agencies to coordinate the provision of future works to ensure the safety of the expected increased number of road users visiting the area.

- It's only a matter of time before someone going for a visit to Unicorn gets hurt in a traffic accident. You cannot develop this area without better maintenance. If this cannot be guaranteed or funded properly, then the development should not proceed (Submission 22).
- The walkway and its promotion will attract more day time visitors to the area, more road users and more requirements for a higher level of care regarding the state of the road. Roads require funding and if planning is being given the correct role there should be a clear budget to upgrade where necessary and also importantly regularly maintain the road (Submission 37).
- Visitors are not equipped or aware of the dangers of the dirt road - many accidents and one fatality. Dust engulfed property during the dry season. Creek crossings are deteriorating rapidly without sufficient maintenance and minimally maintained dirt roads are not designed for increased traffic flow (Submission 38).

- It is obvious that the lighting of fires, large amounts of rubbish and increasing the volume of vehicles on already unmaintained roads is a serious concern (Submission 40).

Traffic congestion and site constraints

Traffic congestion and site constraints at the Unicorn Falls site were raised as a primary concern in a number of submissions.

- For NPWS personnel, emergency response and access for the three neighbours who must pass Unicorn Falls to get to their properties (Submission 43).
- Navigation, overtaking and turning is difficult for the already high number of visitor vehicles passing through the site (Submission 43).
- Begs that this plan gets reconsidered and amended to consider the amount of traffic on roads and to these significant sites for local people and endemic species alike (Submission 20).

One submission asked that consideration be given to safety issues in the event of traffic build-up (bottlenecks), injury to a visitor, heavy rain, or bushfire, as the road narrows to a single lane bridge before Unicorn Falls. As part of the works, construction of two turnaround areas, one before the bridge and another beyond the second bridge and limiting the speed on that section of South Chowan Road to 40 kilometres per hour, as recommended in the 'Plan of Management 2004' (page 52) was suggested (Submission 25).

2. Scale and location of visitor facilities

Several submissions suggested that it would be more appropriate to start the walking trail and create the picnic space near the proposed campground.

- Whilst I assume many hikers that would use the four-day walking track would likely be nature enthusiasts, and for this reason, I am not entirely opposed to this walk, however, I am entirely opposed to any development at the falls themselves... Is it possible that the walking trail could begin at the campground, and that the plans for the day use area at the falls is abandoned altogether (Submission 13)?
- Day trips are most suited to start from a picnic space near the proposed campground. Put all the infrastructure there, at the campground picnic spot on Mann's Road. Toilets, information, BBQs can be there. Start the three-day walk from there (Submission 35).

Several other submissions were opposed to developing or constructing facilities at Unicorn Falls themselves.

- Unicorn Falls is a beloved and vital place of natural beauty and will be compromised by the proposed 'improvements' (Submission 34).
- We love that it is a place we can go to where you can look around and be only surrounded by nature, not picnic tables, man-made steps and tracks and toilets... (Submission 13).
- 'Value adding' will just diminish everything that makes this spot special. It is so rare and sacred to find a place that does not have all the unwanted infrastructure suggested for the site and is just a gentle baby-friendly accessible natural space... (Submission 35).
- Day trips to a generic and tokenistic BBQ area are not appropriate here... Adding stairs and out-of-keeping BBQs mean more people, who are then more likely to add to erosion issues; alongside rubbish, noise, illegal camping, sunscreen issues polluting the water (such as what happened at Minyon Falls) and so on. No to BBQs, picnic tables, info walls and the rest of the proposed day trip plan (Submission 35).
- This day trip plan attracts rubbish, lack of sensitivity for the environment, and more traffic on the fairly impassable at times roads. These concerns are not insignificant. If this is considered imperative, then let this take place at the proposed campground at Mann's Road, not at Unicorn Falls (Submission 35).
- Supports in principle the walking trail proposal, but it should be limited to just that, with no effort made to attract day use visitors. The natural environment and road infrastructure will not cope with the greatly increased use that the Unicorn Falls master plan proposes (Submission 39).
- What is needed at Unicorn Falls is management of the identified sites, not the further development of these (Submission 34).

Some submissions thought the facilities and amenities were appropriate.

- Proposals are of a size to be within keeping of a sensitive area and not too large (Submission 50).

Other submissions identified that with the greater number of people expected, amenities need to be provided and maintained (Submission 34).

Some submissions, whilst supporting the formalisation of the Unicorn Falls precinct and provision of a small number of facilities such as one picnic table, table seats, information shelter and totem signposts, questioned the rationale for other facilities. One raised concerns that the installation of two new double stall toilet bays at two visitor precincts within 1000 metres of each other and the installation of BBQs will invite traffic from Manns Road and will significantly increase the potential for visitors to stay overnight illegally (Submission 43).

Other concerns raised included the proximity of the proposed car park and toilet to the water and the creek and another was concerned that picnic tables are being placed in areas used for gatherings and important ceremonies (Submission 13).

Other submissions suggested providing additional facilities, such as:

- Linkages with other day walks, such as the walk along North Chowan Rd (currently overgrown and blocked by fallen trees), and Unicorn Falls to Hells Holes using a car dropped at either end (Submission 30)?
- Horse specific infrastructure (horse hitching rails at the day use areas and horse hitching rails and/or holding yards at the campground) to support horse riding (Submission 42).

Campground specific comments

Comments relating specifically to the facilities at the proposed campground included:

- Supports the campground only if there is a composting toilet installed such as the system used at the Mullumbimby Community Garden. Without a toilet, visitors will use the bush (Submission 18).
- There is no arrangement included in the master plan for the maintenance of proposed facilities or management of waste at the campground with the expected increase in visitors and vehicles (cars, tourist buses and trail bikes).
- Wild dogs in the area that will cause further environmental issues with any rubbish left behind. Requests that once there is more clarity about anticipated campground usage, visitor and traffic numbers, facilities maintenance and waste management, please ensure the approval process for the master plan allows for further public comment (Submission 25).

A number of submissions recognised that the provision of camping areas is an important way to bring visitors into parks and to raise important revenue to supplement NPWS Area budgets, but need to acknowledge resource requirements to meet public expectations as to how well campgrounds and picnic areas should be managed. Compounding limited staff resources is the distance for response time of around 40 minutes from Tweed Depot.

One submission suggested that the seven proposed camp spots should be sacrificed in return for a multi-purpose day use area which would not only return savings but potentially alleviate a number of potential problems as identified in the recommendations below:

- Apply considerable savings in not developing unnecessary camp site at Manns Road.
- Redirect savings to develop a multi-purpose day use area and short link track to South Chowan Road.
- Remove unnecessary pressures and congestion from Unicorn Falls precinct.
- Provide a range of benefits in the development of a day use area at Manns Road including providing for:
 - off-road parking for a larger number of vehicles
 - disability accessible site
 - safer egress in the event of fire or emergency evacuation
 - improved visitor safety through greater visibility to passing traffic
 - a pleasant open picnic site with access to range of short walking options for day visitors.
- Up to 3.5 kilometres return walk to cater for those visitors seeking a short, easy circular walk starting to/from the proposed Manns Road site while still offering an experience of lush rainforest and waterfalls.

Unicorn Falls Master Plan Submissions Summary

- Drop off/meeting point for TBHT multi-day walk clientele and minibus turnaround area.
- Direct link to proposed TBHT track at the junction of South Chowan and Manns Road.
- BBQs, picnic tables and shelters to cater for a larger number of people.
- A more suitable location for a double stall compost toilet.
- Greater access to the toilet for NPWS maintenance including replacement or emptying of cassettes.

One submission suggested that South Chowan Road be closed to public vehicle traffic in recognition of public safety and make Unicorn Falls a unique walk-in only day use area (~1.3kms from Manns Road site).

3. Protecting environmental values

Protecting environmental values is a core value for NPWS. Environmental assessments examine the significance of likely environmental impacts of the proposal and measures required to mitigate any potential impacts. This environmental impact assessment process highlights the need to ensure public visitation and enjoyment is compatible with the protection of conservation values.

A number of submissions supported the construction of day use and camping areas as being necessary to manage the overuse and environmental damage currently occurring.

Many submissions raised concerns about the impacts that both the day use area and the campground will place on the natural environment, including that:

- The things that make these sites so special are their natural beauty. They are abundant with wildlife. They are extremely sensitive habitat areas and the idea of creating tourism in them will have irrevocable damages to both the flora and the fauna (Submission 20).
- Deeply concerned with the impacts that both the campsite and the day use area will place on not only the natural environment but also on the locals too. Dumped fridges, washing machines, scattered bottles, trash and remnants of belligerent late-night parties at the day use area tell the same old story that the proposed sites will be misused at the detriment of the fragile ecosystem (Submission 33).
- Mount Jerusalem National Park does not have World Heritage status but has world heritage values and therefore care needs to be taken how it is promoted due to these limiting factors (Submission 34).

Some submissions raised the need to find the right balance between increased visitation and the protection of conservation and environmental values:

- The benefit of more people seeking a 'nature experience' will hopefully translate into wanting to conserve these areas into perpetuity. The risk is that increased access in remote areas such as Unicorn Falls, will lead to its degradation and eventual demise via water contamination and the destruction of fragile environment (see below) and plant species. Finding the right balance is critical... (Submission 34).

Submissions raised a number of other environmental concerns including:

- That there was no mention of Herpetofauna in master plan (Submission 8).
- The potential for campers and hikers to have a devastating impact on the critical habitat of the Giant Barred Frog and other ground dwelling species (Submission 8).
- The environmental impacts of developments short term and increased visitation longer term i.e. On the Fleay's barred frog and other threatened species (Submission 11).
- The loss of biodiversity and plants/tree will be damaged by tourists trampling and using as firewood (Submission 13).
- That the threatened species assessments (page 8) makes no mention of ground dwelling species commonly known to suffer detrimental effects of substances such as sunscreen ending up in waterways (Submission 15).
- Encouraging large masses of people to travel to the pool will only increase the potential damage on the natural environment (Submission 15).
- The environmental impacts of the boardwalk and camping (Submission 41).
- The need to monitor Unicorn Falls which has been identified as a Key Biodiversity Site for six species identified by Birdlife International as being in a geographically restricted habitat (Submission 34).

Comments specific to the Manns Road campground and car park included:

- Removing native vegetation to construct the campground (Page 8) is at odds with a sustainable approach (Submission 20).
- Carpark at Manns Road – All of the forest on Manns Road is old established growth, what benefit would it be to clear more forest to encourage more people in to leave their destructive footprint (Submission 40).

4. Impacts on natural amenity

A large number of submissions voiced strong opposition to the day use area suggesting that the proposal would result in a loss of existing natural amenity which would adversely change the character of Unicorn Falls.

- 'Improvements' will fundamentally strip Unicorn Falls of its unique beauty and character and give it the same homogenised feel as most other mainstream day spaces. These 'improvements' are completely out-of-keeping with the main attraction offered – an easily accessible place that still provides the feeling of being immersed in nature away from human-built parameters. ... Day tripping tours in the manner as proposed, will drain the place of any mystery and character, and remove the opportunity for sitting in nature alone in quiet reflection. Existing 'impact friendly e-bike tours already perfect as is (Submission 35).
- The increase in general public visitation will change peace and quiet (Submission 7).
- Unicorn fall is a pristine loved local place that I really wish to see preserved in its untouched nature. The northern rivers are already flooded with tourists and busyness, please keep Unicorn fall, just the way it is (Submission 19).
- Unicorn Falls is a beloved and vital place of natural beauty and will be compromised by the proposed 'improvements' (Submission 34).
- The spiritual energy of the place will be lost (Submission 13).
- Opening up the area will have a huge impact, increase general public visitation will change peace and quiet (Submission 7).
- Objects to the current development plans for Unicorn Falls in Northern NSW. Not everywhere needs developing for tourism and this spot is one that needs to be left alone..... Please leave it as is (Submission 45).
- Would hate to see the beauty of Unicorn Falls and Mount Jerusalem National Park trashed by day visitors and bike riders (Submission 48).
- Likes that Unicorn Falls is undeveloped. It means that you can feel more connected to nature. Walking across the top – a slip hazard? Maybe with a risk of about 2 out of 10. Erosion to the falls? A little but minimal after years of people enjoying them. It is steep, so many people don't even go down there. Doesn't think these are enough reasons to justify any development. Likes Unicorn Falls in its natural beauty. It definitely doesn't need BBQs and picnic tables. That just attracts the wrong experience, and different problems. It has worked well for years under the radar without any of this and is such a beautiful spot as it is (Submission 36).
- Suggests it would be more sensible to place the day use area and trail start on Manns Road where the campground is proposed. Unicorn Falls is already suffering from overuse, but a better way to maintain its natural state would be to not advertise it and restrict access (Submission 39).
- That it provides a unique light-filtered rainforest experience, a place of solitude for day visitors to enjoy (Submission 43).

5. Park management and compliance

A number of submissions identified that the proposed investment in infrastructure and promotion of the day use area, the campground and the trail would generate considerable new demand requiring greater levels of park management, maintenance and monitoring.

One submission suggested that Tweed Tourism Co team, NPWS project team and Destination North Coast meet to discuss (parking) concerns and to better understand the management planning for the day use area's facilities as well as ensuring the development allows for the future needs of the project (submission 44).

Other submissions raised concerns including the need to:

- Provide additional NPWS maintenance for NPWS roads which are unsealed and susceptible to rapid and severe erosion.
- Stop people from camping at the falls all the time, thus making it not friendly or available to the locals who have been using the swimming hole for years.
- Monitor van living campers trying to live in these few car parks.
- Monitor the location to prevent activities such as illegal dance parties and campers, rubbish dumping, stealing orchids and other plants.
- Increase ranger patrols and provide an after-hours phone contact number to report trail bike rider and shooters.

6. Risk and safety issues

In addition to the road safety concerns mentioned above, other risk and safety issues were raised in a number of submissions. These include the potential impact of increased bushfire and flood risks, visitor safety and other public safety risks from illegal activities including dance parties, theft and littering. Identification, assessment and mitigation of these potential risks was raised as critical for the proposed new facilities.

Bushfire and flood risks

- Location of campground (north facing ridge consisting of sclerophyll forest) is extremely dry and poses high fire risk. Remote, difficult for rangers to patrol, with limited access roads or fire breaks put all the endangered flora and fauna and locals lives and homes in jeopardy (Submission 33).
- Incorporation of cooking facilities such as BBQs in such dense and dry national parks gives cause for bushfire concern (Submission 15) and negligent hikers will be a threat in bushfire season (Submission 20).
- Fire management plan needed for what will become an increased risk with planned overnight stays and the chance of visitors' fires being lit at inappropriate times and not managed carefully (Submission 37).
- Concerned about management of visitors during and around the wild climatic events that occur in our region, including floods and fire impact upon the MJNP (Submission 37).
- Lack of fire trail management a concern...there is already a significant threat of erosion and landslide due to the fires. Safety concerns including water source contamination, fires and rubbish thrown over cliff. The forest in these areas is incredibly flammable, they need to be maintained (Submission 40).

Increased illegal activities including dance parties, theft and littering

The provision of facilities as proposed in the draft master plan was seen by some members of the community as providing the potential for increased levels of illegal activities including dance parties, theft and littering.

- The larger the clearing the larger the number of illegal dance parties and campers. Aftermath of these events at Unicorn Hole alone is disturbing. There is no one regularly monitoring this location, with residents picking up the rubbish and report the tourists stealing orchids and other plants, still no sign of NPWS staff. It is obvious that the lighting of fires, large amounts of rubbish and increasing the volume of vehicles on already unmaintained roads is a serious concern (Submission 40).
- We understand the Plan objectives and welcome formalisation of the Unicorn Falls site but remain concerned that improvement of facilities and increased promotion of vehicle access to this remote site will most likely contribute to an increase in public risk including theft and break-ins and increased compliance issues for NPWS staff (Submission 43).

Visitor safety

One submission raised concerns about walker safety, especially in relation to walking close to the falls.

- Trail should not include access to the top of the waterfall (Submission 16).

7. Economic and nature tourism opportunities

Community views on this theme varied greatly.

A substantial number of submissions supported the master plan's potential to boost regional visitor economies and improve recreation opportunities within the Tweed and Byron local government areas by creating a high-quality nature-based visitor experience.

- Simply not enough tourism opportunities for the region. Unicorn Falls and Manns Road has potential to be a really good site for this, once access, trails, infrastructure and facilities are better improved (Submission 11).
- Excited by opportunity to expand visitor experiences in the North Coast Branch, and specifically Tweed Byron Area, and welcomed attempts to provide these through the development of new attractions and facilities to support regional economic growth and create local employment opportunities and new partnerships (Submission 43).
- 'This is a project that we see strong potential in for the Tweed region, and believe it aligns well with the region's focus on sustainable nature-based experiences as outlined in the region's Destination Management Plan'. ...'The Tweed region's tourism demand is growing and with visitors from the South East Queensland source markets being geographically located closest to the Unicorn Falls access point, this day use area development is of key importance for making the project successful into the future' (Submission 44).
- Developments would be an asset to Uki and the surrounding communities. Mt Jerusalem National Park has very little infrastructure to assist locals and visitors to access and enjoy the park. These facilities whilst modest will give visitors a glimpse of what is within the park whetting their appetite for more exploration within the area (Submission 50).
- Thinks it's a great idea creating both day use area as well as a campsite. It will promote eco and sustainable travel by creating better facilities as well as protecting nature by developing a proper trail and parking (Submission 46).
- Aligns with consultations with community for sustainable development within national parks to promote economic opportunities within the local area by bringing sustainable ecotourism into region (Submission 51).
- The Unicorn Falls master plan meets many of the aspirations expressed in community consultations held as part of the Caldera Economic Transition Plan 2009 – 'Integrated Trail Network'. During these consultations there was a strong desire for sustainable development within our national parks to promote economic opportunities within the local area by bringing sustainable ecotourism into our region (Submission 51).
- Must include lookouts and epic views to Wollumbin mountain, if desire is to curb some of the Wollumbin's visitors to this area (Submission 11).

A substantial number of submissions were not supportive of the economic and tourism opportunities presented by the master plan:

- Nature-based tourism needs no development; it is evolving organically and looks to unique spots – not homogenised ones. Regional economies will feel little impact at seven-day walk camping sites – and beyond a bus driver or tour operator or two, destroying the charm of Unicorn Falls will do little to boost the economy, It will instead ultimately drive people away from this as a destination (including existing tour providers) (Submission 35).
- By putting Unicorn Falls on the tourist map, you will be contributing to its degradation over the next few years far more than erosion.

- Opening up the area will have a huge impact, increase general public visitation will change the peace and quiet. There are enough nature-based tourist attractions in the shire (Submission 7).
- This kind of exposure and development attracts rubbish leaving, loud disrespectful people. Charm of the place lost. Please stop milking \$ from our natural environment' (Submission 29).

One individual was appreciative of the increased access to Unicorn Falls.

- Would love to be able to get to Unicorn Falls easily. We are surrounded by beautiful natural parks but access is very restricted (Submission 14).

Some submissions questioned the NPWS rationale of trying to alleviate pressure from Wollumbin National Park and other popular local areas.

- The carrying capacity of the proposed development is too small to result in an alternative option to Wollumbin. Additionally, the proposed walking track and scenic areas are short, compared to Wollumbin (Submission 34).
- Please don't disperse the visitors to the national park. I believe you should plan to improve the existing facilities in the popular areas of the national park such as Mt Warning and Minyon Falls. This leaves larger unspoilt areas to be dominated by the animals and plants. Concerned about the protection of the at least eight endangered species (Submission 47).

8. Cultural heritage values

Protecting cultural and social heritage is a core value for NPWS. Cultural heritage values for both the Aboriginal community and the local community were raised in a number of submissions.

Respecting and acknowledging Aboriginal country was raised as an important issue. Traditional owner input and consultation was identified as a priority (Submission 11) and assurance sought for the spiritual significance of areas to be appropriately recognised and protected during the development stages and later when the public has access (Submission 41).

The provision of signposting and storyboards to provide visitors with information about the local Aboriginal history and culture was raised with one Aboriginal organisation offering the opportunity to share information and knowledge (Submission 41).

The preservation of the Unicorn Falls area for times of gatherings and important ceremonies was raised with one submission voicing that they considered the placement of picnic tables within the tree circle above Unicorn Falls would destroy the area.

- I am heartbroken at the thought of picnic tables being placed within the tree circle above Unicorn Falls (page 11). You may not be aware, but our community uses this spot all the time for gatherings and important ceremonies. This would be destroyed by the placement of picnic tables. We bring our own picnic rugs and sit on the ground. Why can't people that happen upon the spot do the same (Submission 13)?

9. Neighbour amenity and community wellbeing

A number of local residents and park neighbours voiced concerns that the expected increase in visitation to the area would result in their neighbour amenity being compromised:

- That visitor numbers will increase significantly resulting in a loss of neighbour amenity including vandalism and serious thefts from neighbouring properties (submission 25).
- That intruders to their property will leave rubbish, damage access track and vegetation, either willingly or unwittingly (submission 25).
- That they would be unable to protect and preserve their property's ecological attributes (submission 25).
- That the proximity of trail to their property with visitors diverging from path onto private property (nature of the terrain doesn't allow fence or boundary indicators marking what is national park and what is private property).
- That the walk's proximity to houses, litter, behaviour of track users, parking and access to their properties (submission 37).

Community wellbeing was raised as a concern in a number of submissions and some members of the local community thought that the development of this space would not lead to community wellbeing but quite the opposite.

- As Mullumbimby and surrounding neighbourhoods are becoming increasingly urban, somewhere to escape to have an immersed experience in nature is getting exceedingly difficult. Time spent immersed in nature, true nature away from human features, is deeply enriching and beneficial. Benefits of this are documented in science papers ... Knowing that there are untamed spaces away from the 'colonizing' human aspects gives me a real sense of wellbeing – particularly knowing that this is accessible and discoverable as is. Hearing plans to develop Unicorn Falls in such an unbalanced way, makes me feel disempowered and depressed. Developing this space will not lead to community wellbeing. Quite the opposite. Keep the mystery and unbridled beauty of Unicorn Falls as it is (Submission 35).

One submission felt that the desired outcome to 'improve community wellbeing' and 'promote, protect and respect the environmental and cultural heritage of the region' (page 6) has been misplaced with this proposal.

- As a community we have seen the negative outcomes of large groups of hikers at Wollumbin both environmentally and culturally by disrespecting the wishes and customs of first nation peoples (Submission 15).

One comment related specifically to the campground stating that:

- The joy of our community is that it is small and untouched, I do not believe this campground to be in the best interests or to align with the spirit of the community (Submission 15).

10. Education and interpretation

A number of submissions stressed the importance of visitor education at the precinct to acknowledge and present stories on the sites' geological formations, environmental value, local and Aboriginal history and culture of the area that make it unique and worthy of protection. The installation of interpretative displays was suggested to inform park users about:

- The local Aboriginal history and culture in the forms of signposting and storyboards (Submission 41).
- How these places are deeply sacred to many locals so please respect them like they were your own back yard (Submission 13).
- How rare these Rainforest Remnant forests now are and how delicate they are (Submission 26).
- The ancient and geological significance of the Unicorn Falls area (the rock outcrop is a banded rhyolite) to ensure its preservation (Submission 34).
- The amount of petrified rock in the area leads to the potential for Unicorn Falls to become an outdoor geological classroom for local schools and could form part of the educational framework for the falls (Submission 34).

Other submissions sought signage to communicate messages to affect public attitudes and ensure respectful behaviours for the natural and cultural environment, including:

- That wearing sunscreen and lotions into the water, harms the wildlife, that we have less than 1% left of the big scrub remnants (submission 13).
- Signage to clearly state incompatible and prohibited activities and financial penalties that apply such as shooting, dog walking and the use of drones (submission 26).

Management response

We appreciate the time and effort that was put into the submissions we received.

There were a range of views presented with some submissions supporting the general intent of the master plan and others strongly opposed. Others supported the intent of the proposal but not the designs. Alternative options to the NPWS proposals were provided in some submissions.

In response to submissions, the NPWS considered where changes could be made to the draft master plan to improve outcomes for the park's natural and cultural heritage values and for visitors.

These include:

- The site at Manns Road, formerly proposed as a campground, will now become the main car park for Unicorn Falls and trailhead for the multi-day walking track. There will no longer be a campground as part of the development.
- A disabled access, double-stalled skillion composting toilet, a visitor information shelter and 19 vehicle bays (including a minibus drop-off point) will be provided at Manns Road.
- South Chowan Road will be closed to vehicle traffic other than for local residents, park staff and emergency vehicles. A walking track will be established linking the Manns Road site to South Chowan Road, allowing walkers to access Unicorn Falls.
- At Unicorn Falls, formalised access will be provided to the pool above the falls, with steps to the base of the falls providing safe access. Visitor information and informal seating will be provided. The existing parking area will be rehabilitated.
- The multi-day walking track will continue from South Chowan Road on a purpose-built track to the start of Whiskey Creek Trail, approximately 200 metres away.
- BBQs will not be provided at either site to minimise fire risk.

Next steps

Further detailed planning and assessment processes

Due to the proposed changes to the master plan, NPWS has also reconsidered the Review of Environmental Factors (REF), which was prepared based on the draft master plan, and made any necessary changes.

The amended REF is now available for information.

Work that is undertaken for the project will be in accordance with NSW Government Procurement Policy Framework to ensure an equitable process, that guarantees the best outcomes for the region and community.

The next phase of project planning will see the release of the third master plan for public consultation – for the multi-day walk route and three remote walkers' campsites.

The 45 kilometre walk will commence at the Manns Road trailhead in Mount Jerusalem National Park near Uki, and finish at Minyon Falls in Nightcap National Park.

Continuing community engagement

Local community and other stakeholder groups, including those stakeholders who have registered for project updates, will continue to be engaged over the course of the project.

NPWS will continue to consult with Aboriginal groups and local communities to identify suitable stories for planned interpretation and education displays.