

Bushwalking NSW

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Blue Mountains National Park and Kanangra-Boyd National Park

DRAFT PLAN OF MANAGEMENT

Introduction

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from 70 bushwalking clubs throughout NSW and the ACT, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

Blue Mountains and Kanangra-Boyd National Parks have been enjoyed by bushwalkers for generations. Bushwalkers like Myles Dunphy were instrumental in the establishment of these iconic areas as national parks and places such as the Blue Gum Forest in the Grose Valley were the scene of some of the earliest battles for conserving our bushland. Bushwalkers were very much a part of this.

We have reviewed both the draft Plan of Management and the supporting Planning Considerations. Our submission follows the Section Headings in the draft Plan of Management and, where required, the individual page numbers. At the end of our submission we have added some comment on topics that have not been mentioned in the draft Plan.

Our Vision for the Parks

This section could have been more expansive and set out the priorities for managing the parks over the next several decades. One of our key criticisms of the draft Plan is the lack of a 'line of sight' from high level policy aspirations to specific actions in the Scheme of Operations. For example, given expected increased visitor numbers in the parks there is no overarching context for how NPWS will manage these pressures across the region including Service estate adjoining the parks such as Gardens of Stone and Wollemi. Further, there appears to be an assumption that existing visitor precincts will be further developed without providing the reader with a context of where this fits into a Statewide policy position on visitor management.

The other glaring omission from the draft Plan is climate change. There is little content on how climate change will impact the parks, the ecosystems they contain, how the management of fire will need to adapt and what are the implications for increasing visitor numbers.

Why these parks are important

We support the reference to the large wilderness areas that provide some of the most extensive but accessible wild places in New South Wales, offering opportunities for solitude, reflection and self-reliant recreation. We also support the acknowledgement of the significance of the Parks to the development of the conservation movement in New South Wales, and the continued emergence of environmental advocates. This significance was seen in the campaign to block the raising of the Warragamba Dam Wall.

1.2 Greater Blue Mountains World Heritage Area

The Greater Blue Mountains Area was inscribed on the World Heritage List in 2000 for its outstanding universal value and this is noted in the draft.

As per the submission by Wilderness Australia (dated September 14, 2023), it is noted that the Australian Heritage Council is assessing whether the Greater Blue Mountains Area National Heritage place has additional nationally significant heritage values, and whether to expand it to include adjacent areas. Further, the initial assessment by the Australian Heritage Council has identified that the Greater Blue Mountains Area National Heritage Place and some adjacent lands may have additional nationally significant heritage values including cultural associations.

The draft Plan is silent on this assessment. We would recommend that NPWS supports moves to add significant heritage values to the Greater Blue Mountains Area National Heritage Area and to include adjacent identified areas.

1.4 Wilderness areas

Bushwalking NSW supports the statement that "...generally, no visitor facilities will be provided in wilderness, and visitor management will focus on education and the promotion of minimal impact behaviours. However, consideration may be given to management works and minor infrastructure...."

We comment further on visitor management under Section 5 below.

5. Providing for tourism, visitor use and enjoyment

We acknowledge the statement in the draft Plan that "The way people enjoy the parks is changing. This creates challenges and opportunities for managing sustainable visitor opportunities in the parks." However, the draft Plan is largely silent on what these changes are, and the reader is left unclear as to how these changes will drive management decisions about the Parks. Some policy context would be useful here.

5.1 Visitor access

Bushwalking NSW supports the intention to maintain the party limit of 8 in wilderness areas. Any permission to vary this limit should be given sparingly and only when its justification is consistent with management objectives for the area concerned.

5.2 Visitor Facilities

The draft Plan becomes quite complex with its hierarchy of Visitor Facility Zones, Visitor Precincts, Visitor Nodes and Camping Areas. The accompanying Figure 3 does not lend itself to close scrutiny and a larger viewing version would help the reader.

In any case the reader is left unclear as to why certain camping areas are to be closed (Batsh Camp) and why other sites are to be developed for camping (Mt Solitary). No background information is provided in the draft Plan.

There is also a suggestion (p.17) that site hardening, tent platforms or elevated camping decks and associated facilities such as toilets and barbecue shelters may be considered in the visitor facility zone. Together with the suggestion that tents, and other temporary facilities associated with supported camping experiences may also be provided, leads to the question of whether commercial interests will influence the selection and nature of these upgrades and development.

It is also noted that in designated camping areas in wilderness such as Dex Creek, Mobbs Swamp and Burra Korain, the establishment of minimal impact toilet facilities (with fly in – fly out tanks) may be considered where necessary for environmental protection. Bushwalking

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NSW would concur with this proposal where it can be demonstrated that the environmental integrity of these sites is being compromised by over-use by campers.

We also concur with the proposal to use Maxwell Hut for accommodation and development of an adjoining camping facilities provided that the Hut remains under the care and control of NPWS and is not leased.

Proposed Mt Solitary Walk and Camping Locations

Reference is made to Figure 4. Bushwalking NSW concurs with the intent of a formal multi-day walk across Mt Solitary provided that any track upgrades are minimised, and the camping areas incorporate minimal facilities. We would also request that NPWS consults with the bushwalking community about the proposal as it progresses as we consider that many bushwalkers have detailed knowledge of the Mt Solitary area and could offer NPWS valuable input into the design and implementation of the proposal.

5.3 Bushwalking and camping

We note the reference to a new track connection in the Jamison Valley and associated infrastructure and we reiterate our request for the bushwalking community to be consulted as this proposal is progressed. We also reiterate our concern if facilities were to be constructed with the intention to offer them to long-term commercial lessees.

The intention to implement a booking system for some camping areas is noted though we remain unconvinced about the need for a booking system being implemented for camping areas in wilderness areas.

Blue Labyrinth

The Blue Labyrinth is the name given to the area of the Blue Mountains east of the Kings Tableland and south of the Great Western Highway. It is a rough and rugged sandstone area, dissected by steep gullies feeding into the two major creek systems of Glenbrook Creek and Erskine Creek. Prior to the 1960s and the greater accessibility of the Upper Blue Mountains, the Blue Labyrinth was popular with early bushwalkers as it was accessible from the train line.

Although little mentioned in the draft Plan, the area remains an outstanding locality for more remote bushwalking and camping. Bushwalking NSW considers that the area should remain remote and with minimal infrastructure. The enlargement of the St Helena walking track west of Glenbrook for firefighting purposes some years ago converted a walking track into a fire trail. This sort of action should be minimised in the Blue Labyrinth.

Narrow Neck

We reference the submission from Wilderness Australia (14 September 2023) and concur with the recommendation that Glenraphel Road (now affected by a landslide) be permanently closed to vehicles beyond the fire tower and accessible only to walkers, trail runners and cyclists. We also concur with the proposal that a locked gate is installed at Cliff Drive. We remain concerned that the designation of Narrow Neck as a Visitor Site may also enable inappropriate visitor facilities.

Similarly, we request that the draft Plan clarifies the status of Tarros Ladder. It should be retained as it provides walker access to southern areas of the Blue Mountains Park and is of historical significance.

5.4 Cycling

Bushwalking NSW advocates for no further expansion of cycling routes in the two Parks. We would particularly oppose new cycling routes in Wilderness Areas.

5.5 Horse Riding

Similarly, Bushwalking NSW advocates no further expansion of horse-riding access in the two Parks.

5.7 Adventure Recreation

A number of our affiliated clubs undertake canyoning in the Blue Mountains. This can include related activities such as abseiling. Activities by non-commercial clubs are not currently subject to a booking system. This 'arrangement' should be maintained for the non-commercial sector.

5.8 Volunteer Activities

Bushwalking NSW considers that there is scope for NPWS to consider opportunities to involve bushwalking clubs in volunteer track maintenance programs. While this has been undertaken on an ad-hoc basis in other parks, a more formal partnership in relation to Blue Mountains and Kanangra-Boyd should be investigated.

Since the 2019-2020 fires, there has been vigorous regrowth of vegetation which is resulting in some walking tracks becoming inaccessible. Examples of this include the Wild Dogs and walking tracks to the Kowmung River. Bushwalkers have the skills and capacity to access these more remote areas and could contribute to low-key maintenance activities such as vegetation trimming to keep these tracks open.

6.1 Roads and Trails

It is noted that the construction of any new trails identified in the fire access and fire trail plans will require an appropriate level of environmental assessment. It is not clear if an assessment was undertaken in relation to the conversion of the walking track along St Helena Ridge into a fully-fledged fire trail some years ago.

We would hope that this action is not repeated.

In relation to wilderness areas, we concur with the intention to close existing vehicle trails that are no longer required for park management purposes and to not develop new ones.

8. Authorised Activities

In relation to Table 6, we would question the threshold level of 40 people for non-commercial group gatherings and private functions that do not require a consent. This potentially could mean walking groups of up to 40 people using tracks in the parks without NPWS consent. This could result in unacceptable impacts on tracks and the immediate environment.

This number is too high. It should be lowered to 30 people.

The intention to limit recreation parties in wilderness areas to 8 people is supported.

Scheme of Operations

Nearly all the actions listed here are rated as either Very High or High priority so it is difficult to get a sense of when actions will be implemented over the expected life of the Plan (20 years?).

The details listed in the Scheme have largely been commented on. However, we also note the intention to construct a walking track between Springwood and Martin's Lookout and to construct a walking track between The Oaks Trail with Campfire Creek in the Glenbrook area (Medium priorities).

These appear to be worthwhile projects.

The topics below are not mentioned in the draft Plan and are therefore not numbered.

Park Alerts

This is not directly referenced in the draft Plan. Bushwalking NSW recommends that the Park Alert system be reviewed to ensure timely and accessible information about closures and management operations that may affect bushwalkers' (and other visitors) access to the Parks. There have been examples in the past (not necessarily Blue Mountains or Kanangra-Boyd) where sections of parks (or walking tracks) have been closed at extremely short notice or where reopening has occurred without the website being updated.

We also recommend that NPWS considers a text-based alerts and closure system similar to that used by the NSW Environmental Protection Authority (air quality alerts) or Rural Fire Service (fire alerts).

Aircraft Noise

We also note the submission from Wilderness Australia (dated 14 September 2023) concerning aircraft noise from the new Western Sydney Airport and other aircraft including flight ceiling levels over wilderness areas. We urge NPWS to consider the impacts from aircraft noise in relation to the management of the parks. We would be particularly concerned about noise from low-flying aircraft above wilderness areas and recommend NPWS negotiates minimum altitudes for aircraft with the relevant authorities. This should obviously exclude low-flying aircraft engaged in fire-fighting and emergency operations.

Thank you for the opportunity to comment on the draft Plan of Management. Bushwalking NSW Inc looks forward to being kept informed on the final adoption of the Plan.

Yours sincerely,



David Bell
President
Bushwalking NSW Inc.
Xx September, 2023