



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

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A/General Manager
Blue Mountains City Council
Locked Bag 1005
Katoomba 2780
via email at council@bmcc.nsw.gov.au

Dear Madam

Draft Eastern Escarpment Masterplan

The Blue Mountains Conservation Society is a community based volunteer organisation with over 800 members. Its mission is to help conserve the natural environment of the Greater Blue Mountains, and to increase awareness of the natural environment in general. The Society also runs an extensive guided bushwalking program, with approximately 150 guided bushwalks held a year, which are open to the general public. The Society wishes to make the following recommendations in relation to the recently exhibited *Draft Eastern Escarpment Master Plan*.

Failure to identify key issues and trends

The Society notes that the Plan identifies the the following key values and issues in terms of the Eastern Escarpment:

- The presence of state and nationally listed heritage items including the Lapstone Hill Tunnel and Lennox Bridge.
- The presence of significant environmental values including at least 7 different types of vegetation communities, five of which are locally significant vegetation communities within the Blue Mountains City. Two of these significant communities are also listed as threatened ecological communities under State and Commonwealth legislation. However the draft Plan does not identify that the Eastern Escarpment is home to and provides habitat for many native fauna species, including State and Commonwealth listed threatened fauna species.
- That the area contains significant sites to the Aboriginal community and has special cultural importance.
- Based on visitation site surveys - walking (33%) and nature appreciation (22%) are by far the biggest recreational uses, followed by dog walking both on and off lead (14%), then cycling (10%). This mirrors the results of the community surveys for the *Draft Open Space and Recreation Plan*, which found that walking for exercise and then bushwalking are the two most popular recreational activities across the Blue Mountain community.
- The Eastern Escarpment attracts a high number of visitors and tourists, with

- surveys revealing 44% of those surveyed were from outside the Blue Mountains.
- The draft plan mentions but does not sufficiently recognise the impacts from increased visitation on the Eastern Escarpment, including to provide open space and recreational opportunities, resulting from huge increases in residential development in Penrith and Western Sydney more broadly, as envisaged in the draft Greater Sydney Region Plan and accompanying District Plans. The impacts of increases in population in adjoining local government areas will have a significant negative environmental impact on the Eastern Escarpment, and is a key issue which needs to be actively managed. Section 10.2 mentions monitoring the level of site use and visitation (using site activity observation surveys and visitor satisfaction surveys concurrently) as an adaptive management tool and assisting in being responsive to visitor needs. However, the costings for this are very low (\$15,000) and is unlikely to be sufficient to capture essential data including impacts on natural and cultural values from increased use and visitation.
 - The Plan fails to highlight that the Eastern Escarpment provides vital and important scenic values and local amenity to the Lower Mountains and Western Sydney. Retaining the uninterrupted bushland vistas of the escarpment from Western Sydney is a key goal of the Blue Mountains and Penrith Local Environmental Plans.

A Management Plan which is solely focused on tourism and visitation management is not enough

The Draft Plan is not a comprehensive management plan for the Eastern Escarpment as it focuses solely on guiding the future of “nature and culture based recreation” (p3). The plan does not identify issues or proactive actions related to managing the environment or cultural heritage such as Bushcare activities, weed control, catchment or stormwater management, water quality in creeklines, protection and management of threatened species and communities, Aboriginal site mapping and protection, or protection of scenic values. It is unclear therefore how and when a comprehensive environmental management plan will be developed, and how environmental management activities will be co-ordinated with the proposed visitor management actions in the Masterplan. A plan solely focused on visitation and recreation is not sufficient to protect the values of the Eastern Escarpment.

Multi tenure

Effective, efficient and co-ordinated management of the whole of the Eastern Escarpment is significantly hampered by the fact there are multiple public land management agencies involved, with differing objectives in terms of land management. Managing the Eastern Escarpment wholistically at a landscape level will not be achieved unless the issue is proactively addressed. The Society supports the management recommendations on p26, which seek to overcome this issue. The Society particularly supports rationalising land tenure including proposals to consider transferring land ownership of some Crown land to Council. However, it is unclear what the process will be in determining land transfers and when this process will commence. In addition transfer of suitable parcels of Crown land to national parks does not seem to be an option being considered.

The Society strongly recommends a review of the recommendations in terms of land

tenure arising from the Public Land Rationalisation Project (a joint project between BMCC, NPWS, and Crown lands to comprehensively rationalise public land ownership across all agencies which managed to come to agreed recommendations but unfortunately was never implemented). Council needs to review and revisit the recommendations of this Project in relation to the Eastern Escarpment and come to an agreed position with all agencies as to whether the recommendations are still valid and should be implemented, and if not commence a similar process to come to an agreed rationalisation of tenure across all agencies for all public land on the Eastern Escarpment. Either option should involve community consultation on the options proposed.

The Society argues multi tenure also creates confusion in terms of management planning. Some reserves such as Yellowmunde Regional Park have existing Plans of Management but it is unclear, where an area has an existing Plan of Management, which plan takes precedent. For instance the proposal to create a new regional track linking Yellowmunde to Knapsack is currently not included in the Plan of Management for Yellowmunde Regional Park.

Emphasis on shared walking and bike tracks

The increasing use of what has traditionally been exclusively bushwalking tracks by mountain and downhill bike riders is a major issue in the Blue Mountains. Shared walking and cycling routes are a public safety issue, result in user conflicts, impact on bushwalkers and visitor enjoyment and results in negative environmental impacts as bushwalking tracks are not designed for cycling.

Council's draft *Open Space and Recreation Plan* undertook Special Interest Surveys for user groups such as dog off-leash, mountain biking, cliff sports, and sports clubs but there was not a special interest survey for bushwalking. This is very hard to understand and justify given bushwalking is the second most popular recreational activity in the Blue Mountains (after walking for exercise) and despite the existence of well established and accessible user groups in the form of bushwalking clubs in many Blue Mountains towns. Because of this the Society believes that Council does not understand the current profile of bushwalkers and the usage of bushwalking tracks, and has very little information on the needs and views of bushwalkers, especially in relation to the issue of shared tracks. A key issue at the public meetings held for the Eastern Escarpment MasterPlan was the issue of the impacts of bike riders on walkers (p23).

In light of the above, the Society believes there is an over reliance in the Masterplan on shared tracks (p27 and 29). The Society believe consideration should be given to identifying, signposting and enforcing existing and new tracks as either walkers only, shared tracks at all times, shared tracks at certain times only (eg cycling is permitted at certain times only, similar to the way some dog off leash areas operate) or cycling only tracks (such as the Lapstone Downhill Track).

Prioritisation of proposed upgrades and new facilities into high, medium and low

Council's *Draft Open Space and Recreation Plan* identifies that 80% of bushland tracks managed by Council are in poor condition. The Masterplan identifies the poor state of recreational facilities along the Eastern Escarpment as a key driver in developing the plan (p7). Inadequate maintenance of walking tracks is impacting on heritage values as

well as negatively impacting on natural values such as water quality (through soil erosion, inadequate creek crossings), native vegetation communities such as swamps (through vegetation trampling and soil erosion) and native fauna. The Society believes the upgrade and maintenance of existing visitor facilities including walking and biking tracks should be given greater priority over the development of new facilities.

It is also unclear how Council assessed the prioritisation of actions in the plan with only minimal information provided (p55). Given the extent of the actions proposed and the high total cost of all the actions, in reality only actions prioritised as high will have any short term (5-10 years) chance of success so understanding why these actions were ranked more important than others is significant. It does not seem environmental risks or impacts were considered in the priority ranking, which is a serious oversight.

Facility and Lookout Upgrades

The Society supports the lookout facility upgrades as outlined in the Plan with the following caveats:

- Upgraded and new lookouts and facilities should not intrude on the scenic values of the escarpment, especially as viewed from Western Sydney and should not overwhelm a site through the erection of extensive or over the top facilities.
- Removal of native vegetation, especially along the escarpment itself, should be avoided at all cost and re-vegetation of eroded areas should be pursued.

Walking and bike track upgrades

The Society supports the walking track upgrades and proposals as summarised on p41, and notes the total cost is approx. \$2.5million.

There is no summary of the bike track proposals (unlike walking tracks) so it is very hard to 1) get an overview of what is proposed in terms of bike tracks; 2) compare what is proposed in terms of walking and bike track upgrades and new facilities; and 3) compare relative priorities and overall costing between bike and walking track upgrades.

The Society supports that the approach in the Master Plan which proposes no fundamental change to the provision of the single down hill mountain bike trail and the XC circuit allowed for under the existing Plan of Management for Knapsack Reserve.

The Society strongly supports the proposed closure of illegally constructed network of cycle trails into the adjoining reserves including Tunnel Gully Reserve, Darks Common and the northern section of Knapsack Reserve (north of Mitchells Pass). However, the Society does have concerns with the proposed construction of a single alignment XC bike trail or shared trail to allow connection between reserves and extended riding options in the precinct. The Society notes the implementation of any new single trail alignment will be subject to surveying existing and potential new alignments and a review of environmental factors (REF). Given the issues that have arisen in the construction of the downhill bike track the Society will strongly oppose any new track on the Eastern Escarpment which will remove significant amounts of bushland, may negatively impact on listed threatened vegetation communities, and may result in erosion and impacts on water quality. These concerns also relate to the proposed new regional connection shared walking/bike track route from Yellowmunde to Knapsack.

If you have queries in regard to this submission please contact me on mobile 0412 428 202 or email president@bluemountains.org.au

Yours sincerely

A handwritten signature in black ink that reads "Madi Maclean". The signature is written in a cursive style with a period at the end.

Madi Maclean
President
Blue Mountains Conservation Society
mobile 0412 428 202 or email president@bluemountains.org.au