



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

Mr Andrew Muir,
Acting General Manager,
Lithgow City Council,
P.O. Box 19,
Lithgow N.S.W. 2790

11th April, 2017

Dear Sir,

Re: Hassans Walls Public Reserve – draft Plan of Management

Background

This submission is made on behalf of the Blue Mountains Conservation Society (BMCS). The society has a membership of over 800 people, and is a community organisation working to achieve the preservation and regeneration of the greater Blue Mountains region. This submission is underpinned by, and reflects, our years of experience of projects and other aspects of developments which impact on the environment and conservation values of the region.

We appreciate, and thank you for, the opportunity to make this submission on the draft plan of management (PoM) of the Hassan's Walls reserve. Our interest in this beautiful area extends back for many years; indeed a submission was made by K. Muir in 2005 on behalf of The Colong Foundation for Wilderness and the Society. With this in mind, it is disappointing that Gondwana Consulting, who were engaged to prepare the draft plan, did not liaise with the Society in any way. One would think that the Society would be considered to be a stakeholder of some significance, certainly with an interest and track record in the greater good. Unsurprisingly, our primary focus in this submission to the draft PoM is to ensure that the final PoM incorporates the robust application of, and respect for, the environmental values of the Hassans walls reserve and, as an extension, of the western escarpment lands in general.

It is also notable, perhaps concerning, that Gondwana Consulting, in the report's disclaimer, effectively excused themselves from deficiencies in the report because "*The scope of services was defined by Lithgow City Council and was also influenced by time and budgetary constraints imposed by the client, and the availability of reports and other data on the subject area.*"

The Society welcomes the development of a masterplan (the Concept Masterplan or CMP). History has shown us that, in the absence of such insightful initiatives as is being undertaken by the LCC, bushland ecosystems are progressively degraded, with encroachment, deforestation, littering and damage to special natural and human cultural features all too common. The society also appreciates the recognition of surface damage from early coal mining subsidence, although the conclusion of the NSW Mine Subsidence Board in 1998 that "*It is difficult to*

apportion the extent of the cracking to either mining or natural processes” is somewhat improbable given the widespread subsidence-induced damage prevalent all around the Lithgow region mines, particularly above longwall-style mining. However such a failure to properly apportion blame accords with the persistent denial of subsidence damage from collieries under the nearby Newnes Plateau, despite the implausibility of such disavowal.

A: Which aspects of the Reserve and its future management, as guided by the Plan of Management, are you most interested in or focused on?

The report makes it clear that this area has always been understood to be primarily set aside for conservation and the natural environment. In part this reflects the complete transformation of the valley floor to the northwest into an urban landscape of Lithgow township, and the implied value in retaining existing natural areas that have not been destroyed. The township itself is already well endowed with recreational areas, obviating the need to alienate more conserved areas for recreation. Indeed, having such a landscape reasonably well preserved yet so near to an urban area is a special asset that ought to be valued by residents of Lithgow and visitors alike.

Regretfully the uplands surrounding Lithgow, particularly to the north, have not escaped lightly the depredations of a destructive subset of people who seemingly view a damaged or destroyed landscape to be a source of achievement. Those who value the natural environment have long fought against this unsavoury type of activity. The Society sees the Hassan’s Walls PoM as an opportunity to preserve an area that has sustained comparatively little damage. We believe that society in general has progressively resiled from destruction recreation and land use in favour of enjoyment with a lighter touch. The common phrase descriptive of this more enlightened valuing of our exquisite wild and natural places is ‘take only photos; leave only footprints’.

While coal mining has long played a fundamental economic role in Lithgow’s history, that will soon stop. In the longer term, the mining process depletes the resource. But it is likely that mining of thermal coal will cease before the reserves are exhausted due to the failing economics of coal-powered electricity generation. This process will almost certainly be hastened by a growing public awareness of the various deleterious health and environmental impacts of coal mining and coal-fired power generation. The final nail in coal’s coffin is the extraordinary scientific consensus on the role of coal combustion in greenhouse gas generation and the consequent global warming, with recent reports on the dying Great Barrier Reef being a poignant warning of the consequences.

Does Lithgow have a plan B for a post-coal era? One would hope so. If an example of one aspect of this future is sought, one need look no further than Katoomba and environs, where a coal town has morphed into one of Australia’s tourist hotspots. Yet in many regards, the highlands surrounding Lithgow has some environmental and landscape gems that surpass those of Katoomba.

And so Lithgow should treasure its natural landscapes and diligently work to preserve them and to repair existing damage. Mining is but a brief window, but nature tourism is for ever.

The relevance of this analysis is in respect to the risks imposed by both the unsupervised use of existing mountain biking trails and the creation of additional trails. Most respondents to early community liaison cite natural values as the prime value of the reserve area, yet the proliferation of such trails condemns the bushland to death by a thousand cuts. These trails seem to multiply; seemingly there are never enough. And they typically have steep downhill sections that are destined for erosion and gully formation. Further, the creation of the trails involves the removal of trees and shrubs, with no thought to the illegality or environmental damage of this action. Once established, they are also not amenable to being shared by people on foot, and the Society welcomes the report’s recognition of this. Simply, mountain biking trails are inherently not light-touch activities, and should be confined to private land or areas already degraded. If the ‘Pony Express’ route is allowed to be retained, its

maintenance and erosion prevention should be at the cost of the user group. The bike tracks should not be expanded in the study area; preferably they should be rationalised by closing those existing routes least used and have been illegally created.

The society would like to emphasise its rejection of the suggestion that hikers and other walkers can share biking trails. This is not based in reality.

B: Do you consider that the “vision” and overall future direction identified for the Reserve in the Draft Plan is appropriate? Will the Draft Plan help make Hassans Reserve the type of place you feel it should be, or do you feel the Draft Plan’s directions need to be adjusted (and in what aspects)?

As stated above, just having a CMP will be beneficial, as long as it is not used to lock in an existing, unacceptable situation. It is perhaps a human trait for some people to keep pushing the envelope, in this case the envelope of human impact, despite it demonstrably being not for the greater good. The CMP should be an opportunity to right any existing wrongs.

C: Do you feel the Draft Plan strikes the correct balance between protection of the Reserve’s values and use and enjoyment of the Reserve? Do you think this balance needs to be adjusted for any particular values or in certain parts of the reserve?

It is vitally important to recognise that trying to achieve balance is a fraught exercise when both sides of an issue do not have equal value. In this instance, it is clear that most respondents (and presumably most stakeholders) place great value in preservation of the natural amenity, viz the natural ecosystems and particularly any endangered or vulnerable species. Hence use by a small proportion of the community that has ramifications at odds with the general perspective cannot be given equal weight. We have become a more enlightened community than that.

The measures specified for the Hassans Walls Lookout precinct are excellent, and the plans for the other lookouts are sound. The Society also supports the planned heightened attention to the hiking tracks. As Lithgow transitions to its post-mining state, whenever that might be, upgrading and expanding the network of hiking routes in the hills surrounding the town will enhance the growth of the town’s desirability as a tourist destination, possibly to a level to rival Katoomba.

The major, and fatal, flaw with this plan is that it has subdivided the area before the ecosystem studies have been done. Since it is apparent that the mountain bike tracks have been constructed with absolutely no regard for the land they traverse except in regard to the thrills of the users, it is not surprising that valuable natural areas have been traversed and damaged. This gives a clear impression that the mountain biking input has been given priority, and that is not acceptable; it detracts from, and devalues, the whole CMP.

D: Are there any major omissions or shortcomings in the Draft Plan – such as issues or locations that you feel warrant greater attention; additional management actions or directions? Are there management directions or actions that should be included or more clearly spelt out?

* Apart from the closure of existing illegal mountain bike tracks, there has apparently been no attention given in the report to monitoring and remediation of erosional damage on bike tracks allowed to remain in use.

* The urban interface has been discussed in regard to bushfire danger on constructed assets. However the nature of different wind directions produces more intense bushfires moving from west to east, so probably not a major threat to homes. But from an environmental aspect, exotic plant species invasion from homes to bush needs to be monitored and controlled.

* Hidden cameras could be used to deter rubbish dumping, with the fines applied being used to defray the cost.

* There is no mention of cat control, specifically those that roam from private property on the urban interface and prey on native fauna. As with any urban area, such a program aspect would involve community consultation, council regulation and penalties, and would involve cultural change.

E: Do you have any other comments, ideas or suggestions you would like to make? If making comment on specific recommendations in the Draft Plan please remember reference the section of the document /action number and page number to make sure we understand your comment. (Feel free to attach additional pages if required)

There is a clear societal appreciation of the natural environmental aspects of the area in question. This includes weed-free areas. In this regard Lithgow has been assisted by the terrain; unlike the Blue Mountains where development is along the ridgelines and where weeds have easily spread downhill into watercourses, the Hassan's Walls reserve area lies above Lithgow's urban area giving it a natural impediment to weed spread from urban properties. Thus the area's ecosystem has been spared much weed infestation, and attention can be restricted to road fringes. And given the demonstrated avenue of weed dispersal by horse droppings, and given the erosion caused by hard-hoofed animals like shod horses, the banning of horse riding from multi-use tracks is applauded. Finally, LCC should resist any proposals for in-reserve tourist accommodation facilities; this is the role of the township, and is adequately catered for.

Yours Sincerely,

Peter Green
For the Management Committee