



Blue Mountains Conservation Society Inc.

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

6 May 2020

Cameron Chaffey
Acting Director
Blue Mountains Branch
NSW National Parks and Wildlife Service
PO BOX 43
Blackheath NSW 2785

Via email: npws.uppermountains@environment.nsw.gov.au

Dear Mr Chaffey,

Gordon Falls Project The Grand Cliff Top Walk; and, Gordon Falls Lookout accessibility upgrade

The Blue Mountains Conservation Society is a community-based volunteer organisation with over 800 members. Our mission is to help protect, conserve, and advocate for, the natural environment of the Greater Blue Mountains.

Thank you for the opportunity to comment on your Community Information Letter received on 23 April 2020. Our response is in three parts -

- The Grand Cliff Top Walk; and,
- Gordon Falls Lookout accessibility upgrade.
- A broader context.

1. The Grand Cliff Top Walk

The Society is strongly in favour of the concept of this walk. Our preference is for a safe and minimalist path. We look forward to receiving further details as foreshadowed in your letter.

The Society has four bushwalking groups who regularly have parts of the existing Grand Cliff Top Walk in its program. Individual members also enjoy this walk. In addition many members are familiar with the native flora and fauna, and our Bushcare members are all too familiar with invasive species. This wealth of experience and knowledge may be invaluable in the planning of upgrades.

The beauty of this Walk is that it combines a vast array of native flora, unparalleled views of the Jamison Valley, various vegetation landscapes, the gentle sounds of waterfalls, birds and nature in general – and of course a sought out grounding tranquillity.

There's a chance to come across some uncommon flora that is virtually only found in the Upper Blue Mountains – see Images 1 & 2. This brings us to our first concern - protecting these plants and their sensitive surrounds. We trust that due diligence and care would be taken during construction, and that

appropriate signs and statements would be included in promotional material when the upgraded tracks come into service.

The Society also has a difficulty with “fun runs” on the more fragile sections of the Walk. These are walking tracks and are easily damaged by large groups of competing runners. It would defeat the purpose of doing these upgrades if these events damage the tracks.

A third and ongoing concern is the maintenance of the Grand Cliff Top Walk and its side tracks. An allowance for ongoing maintenance needs to be part of the upgrade plans. This is standard business practice, and a reassurance that ongoing funding is part of this initiative should be declared.

The Grand Cliff Top Walk from Gordon Falls to Leura Cascades is currently closed due to the landslide at Leura Cascades – and before that, parts of the Walk was closed due to the Ruined Castle Bushfire. However the last time the writer walked this part of the track, there were several near impassable sections between Olympian Rock and Tarpeian Rock.

The section from Golf Links Lookout to Carleton Rd also needs some work – specifically treads that have been washed away leaving the supporting risers as a hazard.

The track from Lyrebird Dell that joins the Grand Cliff Top Walk at the enchanting Pool of Siloam is in a very poor, hazardous in fact, state – see Images 3, 4 & 5. This has been deteriorating for several years.

This track is particularly important as it provides a loop walking track from Gordon Falls Reserve and passes through several different vegetation landscapes and the Lone Pine memorial. (Best walked counter clockwise.)

In summary, we ask to be advised and reassured -

- a. That additional annual funding will be provided to maintain the upgraded Walk.
- b. That the existing Grand Cliff Top Walk and associated tracks, specifically Lyrebird Dell, be repaired.
- c. That uncommon flora species and their ecological community will be protected.
- d. That the Grand Cliff Top Walk will be safeguarded from the damage done by “fun runs”.

2. The Gordon Falls Lookout Accessibility Upgrade

2.1 The Lookout

The information provided on the Gordon Falls Lookout Accessibility Upgrade is alarming due to the following –

- It appears that mature trees and shrubs will be removed (see Image 6)
- The proposed boardwalk is on a slope on the edge of the escarpment (see Images 7, 8 & 9)

A consideration often overlooked is the impact of scenic values. That is, how intrusive is the new lookout in terms of being viewed from the valley floor and from other lookouts along the escarpment.

Could the Society be advised and reassured –

- e. That engineering studies have been conducted on the stability of the boardwalk – including the weight that dozens of tourists would exert on it.
- f. That a flora and fauna survey has been prepared to ensure no threatened species are affected.
- g. That a list of mature trees and shrubs be produced so the impact can be assessed.
- h. That scenic values have been assessed.

It is only with this information that the Society can provide considered comment.

2.2 The Gordon Falls Reserve Precinct

It is not within the Society’s charter to enter into the impact on the local residents that this upgrade would have. But it would be expected that dozens of tourist buses would stop here and have a significant impact on the tranquillity of surrounding homes and streets.

The upgrade proposed for Gordon Falls Lookout would make this a major tourist attraction - including large tour groups. This would result in increased parking requirements and demands on facilities such as seating and toilets.

This is the same issue facing existing national park entry points for visitors at the Conservation Hut and Lincoln's Rock at Wentworth Falls. Parking pressure at these locations have resulted in proposals being put forward by a variety of groups for the development of major new parking areas and facilities within the national park or surrounding natural areas, resulting in the removal of vegetation and scenic values.

If Gordon Falls Lookout is to be upgraded to a major scenic attraction for visitors, issues of upgrades to parking and facilities must be assessed and considered at the same time as the upgrade otherwise in a short period of time these issues will become pressing and ad hoc proposals for intrusions into the national park will again be put forward to address them.

It is much better to do a plan and design for the whole visitor precinct adjacent to the lookout now as part of the upgrade, to determine what the future visitor requirements will be, including whether the concurrent upgrade of the necessary visitor facilities such as parking and toilets is desirable, sustainable, and can conceivably be achieved, including funding.

Finally, the whole area along Lone Pine Ave and Olympian Pde Leura is a designated 'escarpment protection' area ([LEP 2015 6.12](#)) – like a lot of areas on the edge of the escarpment. This means there's a host of development restrictions on those house blocks - but it doesn't cover the national park. It's unpalatable that these considered and valuable restrictions apply to development across the road, but not to the land closer to the escarpment.

3. A Broader Context

The issues arising here should be considered in a broader context.

The Blue Mountains National Park has by far the highest visitor numbers in Australia for national parks. NPWS needs to have a visitor management strategy which covers all the well known entrance points.

The Society looks forward to your response to our comments and working with NPWS to achieve a positive outcome. Please don't hesitate to contact the writer if clarification or more information is required.

Yours sincerely,



Alan Page
2nd Vice President
Blue Mountains Conservation Society
4784 1704 - leuralan@hotmail.com

cc. Trish Doyle, Blue Mountains MP

Attachments

Image 1

The Mountain Christmas Bell (*Blandfordia cunninghamii*) on the Grand Cliff top Walk.



Image 2

The Rock Sprengelia (*Sprengelia monticola*) on the Grand Cliff top Walk.



Image 3

The Lyrebird Dell to Pool of Siloam track. A slippery and precarious section.



Image 4

Steps leading down to Lyrebird Dell. This section has become a creek.



Image 5

A landslide next to the steps leading down to Lyrebird Dell.



Image 6

A mature Blue Mountains Ash (*Eucalyptus oreades*) on the path to the Gordon Falls Lookout.



Image 7

Steps leading down to the Gordon Falls Lookout showing a mark peg on the slope.



Image 8

The Gordon Falls Lookout “peninsula” as seen from the Grand Cliff Top Walk near Golf Links Lookout. The Gordon Falls Lookout is shown on the far left – someone is standing there.

Note the “gap” in the cliff face on the right of the image.



Image 9

The Gordon Falls Lookout “peninsula” as shown on Six Maps. The Lookout is circled. This shows the “gap” mentioned in Image 8.

