



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

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The Manager
Planning Evaluation and Assessment
National Parks and Wildlife Service
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To whom it may concern,

Submission to Public Consultation Blue Mountains National Park, Proposed Amendment to Plan of Management

The Blue Mountains Conservation Society has a membership of over 900 people and a long history of working for the protection and conservation of the Blue Mountains environment. The Society appreciates the opportunity to contribute to, and make comments upon, changes to the Plan of Management for the Blue Mountains National Park. Please see our response below.

Govetts Leap amendments and Precinct Plan

The aim to improve Govetts Leap lookout so that it is safe for pedestrians and meets disability accessibility standards is positive as are signage and track upgrades. The Society support signage at both the heritage centre ad in the lookout area

The Society has concerns regarding the size, location and impact of the proposed 100 car parking area plus bus facilities. In particular:

- the carpark area, sitting higher than the lookout, appears to be the dominant feature of the space and is opposed in its current state
- proposed new parking moves native vegetation and leaves on open car park with light replanting and minimal screening on eastern and northern sides. There is little room for adding screening on eastern side.
- the parking area would have on hard surfaces as would the seated area in front of it and cars themselves will be reflecting the sun. Echo Point, another open lookout on the edge of the escarpment, has large paved areas with little shade. It is very hot in summer.

- the increase of hard surfaces may have an impact on the significant, groundwater-dependent, wet cliff-face community below the lookout, including the important population of the Vulnerable *Isopogon fletcheri*. This is the most spectacular example of such a community in the Blue Mountains. A proper assessment of the impact of the proposed new impervious surfaces and the associated surface drainage system within the redevelopment must be considered in terms of seepage-dependent cliff-face community below. This ecosystem is supplied with groundwater from the cliff-face in association with various aquifers and claystone or shale aquitards in the sandstone.
- the Precinct Plan does not consider the important factor of the views of the proposed redeveloped lookout from within the Greater Blue Mountains World Heritage Area (GBMWHA)
- the aesthetic values of the GBM World Heritage Area are recognised in the Strategic Plan for the area. They have been nominated to the Commonwealth Government for consideration as an additional value at national heritage level with a longer term aim for world heritage recognition of the aesthetic value.
- the Review of Environmental Factors (REF) which will need to be done for the EPAA Part approval of the lookout development should assess the impact of the proposed development on the quality of views from within the Greater Blue Mountains World Heritage Area (WHA) such as from Lockleys Pylon, the Mount Banks Trail which come to the edge of the escarpment and from the track from Govetts leap toward Pulpit Rock.

The Society would recommend that parking be placed in the existing cleared spaces with additional parking placed closer to the heritage centre rather than removing more vegetation near the lookout. The location of the carpark appears to be out of touch with best practice. In the Australian context, from the early 70s, parks organisations including NSW NPWS have sought to manage key 'loved to death sites' by pulling back the parking areas from the key vantages, be that a cliff top or summit, and making people walk some way to the lookout. This is the case in places such as the Twelve Apostles, Uluru and Mt Kosiuszko which is an extreme example of the progressive removal of the car park from the Summit in the interests of protecting and preserving the Summit experience and reduce the visual impact of vehicles.

Narrow Neck amendments

It is concerning that, unlike Govetts Leap, the proposed amendment change is not accompanied by a precinct plan which shows where NPWS would like to put the proposed lookout and picnic areas. This plan should be made publicly available now.

Lookouts with vehicle access would have to be in the most northern part of Narrow Neck before the locked gate which is also the most physically constrained section. Narrow Neck is home to threatened species and Blue Mountains swamps. It is home to threatened species including *Leionema lachnaeoides* and *Zieria covenyi*. It is also an important part of the route for the annual honeyeater migration which feed on banksias (*ericifolia* and *marginata*). The recovery of Banksia *ericifolia* is more difficult as it takes a long time for new plants to grow from a seed to a flowering shrub that produces enough seed again to make it through the next fire. Narrow Neck has been heavily impacted by the 2019-20 Bushfires and needs to be protected including from foot traffic to allow recovery to occur.

Currently, the visitor usage of the whole plateau is largely on the main trail (walking, mountain biking and running) except for rock climbing which occurs in specific designated areas. Visitor impacts have been largely confined to along the trail and its edges. This should continue to be the focus of usage particularly as the plateau slowly recovers from the severe bushfires impacts.

The Proposed plan for Narrow Neck and REF should be made publicly available.

Green Gully Precinct

The changes propose that Plan of management functions are delegated to the precinct plan but Precinct Plans do not have the same weight. The Society is concerned that use of the terms "adaptive use" and "modified area" is inappropriate will permit significant and inappropriate development in the future.

Traditionally the site is an access point for wilderness rather than a destination for long stay visitation. Low-key, relatively self-sufficient activities such as picnicking, short stay tent based camping at Dunphys Campground are supported but it is unclear if increases in development will be proposed later. This could have significant increase in usage and environmental impacts which would not be supported.

Thank you for the opportunity to make comments on the proposed changes.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Tara Cameron".

Tara Cameron
President