



# Blue Mountains Conservation Society Inc

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**Nature Conservation Saves for Tomorrow**

13 June 2023

To:

Dr Rosemary Dillon,  
Chief Executive Officer,  
Blue Mountains City Council  
[council@bmcc.nsw.gov.au](mailto:council@bmcc.nsw.gov.au)

Attention: Plans of Management Project Team  
Blue Mountains City Council

Dear Dr Dillon

## **HAROLD HODGSON PARK - DRAFT PLAN OF MANAGEMENT**

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organization with over 900 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 would like to make a submission regarding the recent public exhibition of the draft Plan of Management for the Harold Hodgson Park Katoomba.

### **Key recommendations**

The Society has a number of serious concerns in regard to the draft plan and makes the following recommendations:

1. The following significant conservation assets be included and highlighted in the Plan:

1.1 Katoomba Creek flows through the Reserve. It is a significant tributary of Govetts Creek which ultimately flows into the Grose Wilderness Area and the Greater Blue Mountains World Heritage Area (GBMWhA). There is the potential to negatively impact on the GBMWhA by transporting weed seeds and sediment.

1.2 Significant vegetation communities exist on the western side of Katoomba Creek (under Schedule 6 of the Blue Mountains LEP 2015). The woodland in the park may qualify as *Eucalyptus mannifera subs gullickii* alluvial woodland. The dominant tree species are *Eucalyptus mannifera subs gullickii*, *E. radiata subs radiata*, and *E. oreades*. The alluvial flat on the western side is transitioning/reverting back to a *Carex* dominated valley swamp (also potentially a Schedule 6 community). For more detail, please see below.

These are important conservation assets which are not recognised or protected in the draft plan. This is despite the fact that the native vegetation in most areas is in poor condition and the riparian zone vegetation on either side of the Creek is in very poor condition. The Park is badly affected by non-indigenous plants, including many recognised weed species.

2. The draft Plan of Management be amended to make better provision for the protection and restoration of Katoomba Creek (both in terms of water quality and quantity and restoration of its riparian zone), including effectively managing weeds to protect the World Heritage Area downstream. The Society recommends that the plan includes the following:
  - a. Benchmark and publish Water Quality Improvement Targets for Katoomba Creek which measure the quality, quantity, and velocity of the water where Katoomba Creek enters the Park and where the Creek leaves (exits) Harold the Park by 30 June 2024.
  - b. Establish, plant, and maintain a fenced riparian buffer of a minimum of 20-metres-wide along both sides Katoomba Creek where it passes through the Park by 30 June 2025.
  - c. Prepare a Native Vegetation Report (including vegetation in the Riparian Zone) and a detailed bush regeneration work plan for the reserve.
3. The Society further recommends that the Council specifically consults with, and invite submissions from, key park stakeholders including the Upper Katoomba Creek Bushcare Group, Aboriginal Cultural Resource Centre (ACRC), the Blue Mountains Community Gardens Group and the Iron Guard/Vikings prior to finalising the Plan of Management. This includes extending the submission date to allow those organisations/groups to properly participate in the Plan of Management development process.

### **Key issues**

The Society has identified the following key issues and recommendations in terms of the draft plan which need to be addressed.

#### ***Failure to recognise the multiple users of the Park***

The draft Plan of Management appears to be based on an assumption that the whole of the Reserve is exclusively used by and is the responsibility of the Blue Mountains Community Gardens group. This premise is clearly stated on p25 (last sentence) in the preface to the Action Plan and underlies the draft plan in terms of what has been done to date and is recommended for the future. As a result, the document is severely limited in terms of recognising the multiple uses of the park as well as the conservation values of the park and identifying future management actions to enhance those conservation values.

In spite of a significant part of the Park being zoned for its conservation values (C2), the focus of the plan is on its recreational use; viz the construction and activities of the Community Gardens Group. The Community Gardens Group however is only responsible for and uses the area on the eastern side of the creek between the carpark down to the houses.

Tucked away on pp13/14 of the draft Plan there is some mention of the Upper Katoomba Creek Bushcare Group and the “Iron Guard” but not of the ACRC and its Indigenous Food Garden. Each of these groups were allocated an area and responsibilities for weed management, as was Council’s Bushland Management section. The delineation of these areas and groups would be useful to include in the Plan of Management.

Council (via the Bushland Education Officer) negotiated an agreement in around 2013 between the four community organisations using sections of the Reserve, which was later updated by staff from the Urban Weeds Team. Despite this it does not appear that information has been sought from the community groups who use the Park (including the Upper Katoomba Creek Bushcare Group and ACRC) or even the Council teams involved in the management of this section of Katoomba Creek including the bush regeneration team, Urban Weeds and Bushcare. The Society wonders if the Environmental Management section of Council been consulted at all on the draft plan.

### ***Land information (p5)***

We **recommend** that the following line be corrected:

from “also known as: Katoomba Community Gardens”

to “Part of Reserve also known as: Katoomba Community Gardens”

### ***Community Land Categories Map (p7)***

Most of the site has been identified as Natural Areas (either bushland or watercourse). There is an anomaly shown in the map on p7 where one lot amongst the row of lots depicted as ‘natural area’ has been separated out as “park” - lot 3 Sec. 20 DP 758553. There seems to be no reason for this as it is part of this band of remnant bushland.

It is therefore **recommended** that lot 3 Sec. 20 DP 758553 (on the western side) be recognised as “Natural Area- Bushland” consistent with adjacent areas of bushland.

### ***Conservation assets (p9)***

#### *Katoomba Creek and Greater Blue Mountains World Heritage Area*

The most significant asset within the Park - Katoomba Creek - has not been recognised. The Reserve contains the headwaters of a significant tributary of Katoomba Creek which in turn flows into Govetts Creek, meeting the Grose River near Blue Gum Forest. Therefore, the Park’s significance to the health of the Grose River catchment of the World Heritage Area needs to be acknowledged and reflected in the Plan of Management. It does not appear to be in the current Plan of Management. This draft Plan of Management has downplayed the importance of Katoomba Creek and its conservation significance is not recognised (p9).

In recognition of its significance, this Plan of Management needs to ensure that the quality, quantity and velocity of the water entering and exiting Katoomba Creek is not causing harm. The other harm likely to be caused to the WHA downstream is from the Park being a source of weeds and the creek transporting these seeds downstream.

The most basic safeguard for a watercourse is a dense buffer of indigenous creekline vegetation. Council carried out research into what this minimum might be as part of the

Environmental Management Plan 2005 which concluded that this must be a minimum of 20 m where sides are level. Not only does a riparian buffer protect water quality and quantity, but it can also provide a barrier for weed seeds entering the watercourse and moving downstream into the national park below.

The draft Plan of Management states that “the creek and tributaries are protected under the LEP” (p8). It is true that the intention of the LEP is to protect watercourses from development by giving a “Protected Area” status over watercourse corridors. However, in reality the creek has NOT been protected – the banks of the watercourse running through the Reserve have been severely denuded and contain not only listed weeds but exotics such as apple trees, which can get established in wilderness areas. This lack of a buffer means that the creek is a source of sediment and weeds into the Grose Wilderness Area.

A high priority **recommendation** is for the Plan of Management to include a management action to re-instate a buffer of native vegetation at a minimum of 20 metres both sides of the watercourse.

#### *Scheduled Vegetation Community*

There are possibly two vegetation communities which should be recognised as Conservation assets.

The plan of Management shows a map of the only native vegetation on site as being two sections of “modified bushland”. Over the last 10 years restoration of the western area (adjacent Whitton St) has occurred to the degree that this listing should be reviewed. It could qualify as *Eucalyptus mannifera subs gullickii* Alluvial woodland as the co-dominant trees are *Eucalyptus mannifera subs gullickii* and *E. radiata subs radiata*. The presence of *E. Oreades* indicates that it is probably in the transition zone between these Schedule 6 Significant Vegetation Communities (Blue Mountains LEP 2015).

On the alluvial flats, between the creek and the woodland on the western side, the area is reverting to a *Carex* dominated valley swamp. This type of swamp could be included in the Schedule 6 community known as Blue Mountains Swamps.

It is therefore **recommended** that the classification of the vegetation communities on the western side of Katoomba Creek be reviewed.

#### **Vegetation condition (p9)**

The condition of bushland on the western side of the creekline has been improved by the work of the Upper Katoomba Creek Bushcare Group since prior to 2013, when the group worked under the banner of the Katoomba Creek Bushcare Group.

The text below the map on page 9 implies that weed infestation occurs only on the western side. It does not acknowledge that the eastern side of the creekline is almost entirely covered by exotic plants, including many weeds (as listed in the Blue Mountains DCP). The remnant patch of native plants on the eastern side of the creek has been worked occasionally by Community Gardens volunteers. Along the creek there has been some joint work undertaken by volunteers from the two groups.

As the agency responsible for the riparian corridor, BMCC Bushland Management has contracted bush regenerators to treat a well-established infestation of blackberry, but this needs follow up urgently to ensure the investment in primary and secondary work has not been wasted.

### **Use of land and improvements (p13)**

The failure to recognise the multiple park users is discussed above.

We believe a few corrections of fact may need to be made:

- Para 1 (p13) - add members of ACRC and Upper Katoomba Creek Bushcare Group
- Para 5 (p 13) - needs correction. We understand that the Indigenous Ceremonial Fire and Meeting Circle is still within the ACRC Bush Tucker Garden section not the area managed by the Community Gardens.
- Para 8 - Restoration of the watercourse is the responsibility of the BMCC Bushland Management with occasional assistance from volunteers from both Upper Katoomba Creek Bushcare Group and the Community Gardens.

### **Management issues (p14)**

The major management issue which has been excluded from the list on p14 is the restoration of a thick, vegetated native riparian buffer both sides of the creek of at least 20 m as outlined above. On the eastern side exotics have been planted within metres of the bank and appear to be encroaching further.

The identified issue of the “relationship with the Blue Mountains Organic Community Gardens Group” should be expanded to include all groups using the Reserve land

We agree with the last 3 dot points on the negative impacts of weeds, urban stormwater and fire regimes.

### **Management approach (p15-24)**

The tables on pp15-24 are so generic that they cannot possibly guide the management of the Reserve. It is **recommended** the additional management actions as outlined in Attachment A to this submission are incorporated into the Plan of Management.

Natural Area watercourse (p22). This section should identify the need to re-establish a riparian buffer of indigenous vegetation. It is not an appropriate performance target to “maintain condition and resilience of riparian vegetation”. It appears that the absence of a riparian vegetation has not been noticed nor consideration given to the standards for riparian buffers included in DCP 2015.

### **Future development and uses (p24)**

There is no mention that any future developments and uses should ensure that the protection of the watercourse, the swamp or the woodland is not compromised.

### **Action plan for whole reserve (pp26-27)**

Whilst it states on p 25 that this Action Plan is only for the Community Gardens area, it appears it is intended for the whole of the Reserve.

The action plan outlined on pp26-27 needs to identify specific actions and which agency or section of council is responsible. There are only two specific, on-ground actions listed out of the eight, the rest are about monitoring or planning.

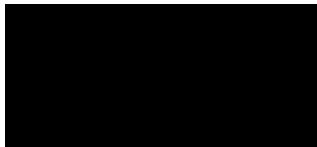
Action 5 needs to specifically list the creation of a riparian buffer of native vegetation at least 20 m width each side of the banks, as stated above.

### **CONCLUSION**

The Society requests that the draft POM be extensively revised, taking into account the Society's recommendations and after consultation with all community groups involved in the Park and all relevant environmental sections of council.

If you have any questions in regard to this letter, please contact me on email [president@bluemountains.org.au](mailto:president@bluemountains.org.au) or mobile [REDACTED]

Yours sincerely,

A large black rectangular redaction box covering the signature of Annette Cam.

Annette Cam  
President  
Blue Mountains Conservation Society

**Attachment A Specific recommendations in terms of park management actions**

<b>Table 1</b>			
<b>Management objective</b>	<b>Performance target</b>	<b>Means of achievement</b>	<b>Assessment of performance</b>
<b>Service Planning</b>			
<p><b>[Recommend insertion of new Management objective]</b></p> <p><i>Environmental services: Establish, plant, and maintain a 20-metre-wide buffer on both sides of Katoomba Creek where it passes through the Reserve (measured from the top of the bank).</i></p>	<ul style="list-style-type: none"> <li>• <i>Set and publish Water Quality Improvement Targets for Katoomba Creek where the Creek leaves (exits) the Reserve by 30 June 2024.</i></li> <li>• <i>Achieve the Water Quality Improvement Targets.</i></li> <li>• <i>Fence and plant 20-metre-wide Riparian Buffer by 30 June 2025</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Establish, plant, and maintain a fenced, 20-metre-wide vegetation Riparian Buffer along both sides Katoomba Creek where it passes through the Reserve.</i></li> </ul>	<p><b>[Recommend insert above the first of the current dot points]</b></p> <ul style="list-style-type: none"> <li>• <i>Benchmark and publish Water Quality Improvement Targets for Katoomba Creek which measure the quality, quantity, and velocity of the water where Katoomba Creek enters the Reserve and where the Creek leaves (exits) the Reserve.</i></li> </ul>
<b>Asset Management</b>			
<p><b>[Recommend insertion of new Management objective]</b></p> <p><i>Environmental Asset Repair/Management.</i></p>	<p><i>Achievement of the Water Quality Improvement Targets identified above</i></p>	<ul style="list-style-type: none"> <li>• <i>Establish, plant, and maintain the Riparian Buffer identified above.</i></li> <li>• <i>All new plants to be local indigenous native plants.</i></li> <li>• <i>Where possible, remove non-indigenous plants gradually at staged</i></li> </ul>	<p><b>[Recommend insert above the first of the current dot points]</b></p> <ul style="list-style-type: none"> <li>• <i>Identify the amount of funds required to carry out the works.</i></li> </ul>

		<i>intervals, from within the Riparian Buffer.</i>	
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<b>Table 2</b>			
<b>Management objective</b>	<b>Performance target</b>	<b>Means of achievement</b>	<b>Assessment of performance</b>
<b>All natural area sub-categories</b>			
Reduce the impact of adjacent land use	<i>[Existing text]</i>	<b><i>[Existing text then recommend adding)</i></b> Develop and Implement policies that deal with encroachment.  Resource these policies.	<b><i>[Recommend insert above the first of the current dot points]</i></b>  • <i>Benchmark and publish present extent of impacts of adjacent land use</i>
Natural area - bushland			
<b><i>[Recommend insertion of new Management objective]</i></b>  <i>Maintain bushland where condition is good and restore degraded bushland</i>	<i>Bushland in good condition is maintained in good condition.</i>  <i>Degraded bushland is restored to 'good' condition by 30 June 2025</i>	<b><i>[Existing text then recommend adding]</i></b>  <i>Undertake bush regeneration works</i>	<b><i>[Recommend insert above the first of the current dot points]</i></b>  • <i>Native Vegetation Report including survey and map and description of condition of existing native species and ecological communities and weeds completed by 30 June 2024.</i>
Reduce impact of weeds	<b><i>[Recommend insert in the current dot points]</i></b>	<i>[Existing text]</i>	<b><i>[Recommend insert above the first of the current dot points]</i></b>



	<ul style="list-style-type: none"> <li>• <i>Condition of native vegetation (as identified in the Native Vegetation Report described in column 4) is improved or maintained.</i></li> <li>• <i>High Risk Weeds identified in the Native Vegetation Report described in column 4) are eliminated or effectively controlled.</i></li> <li>• <i>Other weeds identified in the Native Vegetation Report described in column 4) are effectively controlled.</i></li> </ul>		<ul style="list-style-type: none"> <li>• <i>Native Vegetation Report described above completed by 30 June 2024</i></li> </ul>
Natural area – watercourse			
Protect aquatic habitats	<p><b><i>[Recommend insert the following dot points after the existing text]</i></b></p> <ul style="list-style-type: none"> <li>• <i>Set and publish and achieve Water Quality Improvement Targets for</i></li> </ul>	<p><b><i>[Recommend insert the following dot points after the existing text]</i></b></p> <ul style="list-style-type: none"> <li>• <i>Fence and plant Riparian Buffer by 30 June 2025</i></li> </ul>	<p><b><i>[Recommend insert above the first of the current dot points]</i></b></p> <ul style="list-style-type: none"> <li>• <i>Achievement of Water Quality Improvement Targets for Katoomba Creek.</i></li> </ul>

	<p><i>Katoomba Creek.</i></p> <ul style="list-style-type: none"> <li>• <i>Fence and plant 20-metre-wide vegetation buffer by 30 June 2025</i></li> </ul>		
Manage riparian zones	<p><b><i>[Recommend insert the following dot points after the existing text]</i></b></p> <ul style="list-style-type: none"> <li>• <i>Condition of riparian zone vegetation (as identified in the Riparian Zone Vegetation Report described in column 4) is improved or maintained.</i></li> </ul>	<p><b><i>[Recommend insert the following dot points after the existing text]</i></b></p> <ul style="list-style-type: none"> <li>• <i>Fence and plant Riparian Buffer by 30 June 2025</i></li> </ul>	<p><b><i>[Recommend insert above the first of the current dot points]</i></b></p> <ul style="list-style-type: none"> <li>• <i>Riparian Zone Vegetation Report including survey and map and description of condition of existing native species and ecological communities and weeds present in the riparian zone is completed by 30 June 2024</i></li> </ul>