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Nature Conservation Saves for Tomorrow

25 September 2023

Submission on the Draft Plan of Management for Blue Mountains and Kanangra-Boyd National Parks

1. Introduction

Blue Mountains Conservation Society (the Society) has a long-standing interest in the protection and effective management of the Greater Blue Mountains World Heritage Area and its constituent conservation reserves. The Society is a community-based volunteer organisation with over 900 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains.

2. Summary

- The Society is pleased to see the plans for these two important national parks are being updated as they are well overdue. However, the Society has a number of concerns about what is being proposed and, accordingly, we recommend changes to the plan.
- The new plan fails to outline and respond to the significant changes in the operating environment and social and ecological context, both global and local, including accelerating impacts of climate change and biodiversity loss, more severe bushfire events and a /large increase in visitation.
- The draft plan removes some valid restrictions from the 2001 plan and in places uses vague language which gives park managers too much discretion.
- The plan contains much less conservation information about the parks and consigns the details to a separate non-statutory Planning Considerations document. As a result the plan is more like a visitor management plan without the context of the conservation values which have to be protected. The plan itself should contain more detailed conservation information.
- Many of the actions in the proposed plan's Scheme of Operations restate legal requirements which need to be followed regardless of any plan of management. The Scheme also has fewer measurable actions than the current plan.
- The challenges of large and probably increasing visitor numbers are appreciated. Upgrades to high visitation areas, provided there is public consultation, thorough and transparent environmental assessment and justified need, is supported. However, the

proposal for future undefined visitor facility development with no identified physical footprint and approved through a process outside the plan's controls, is not supported.

- The management of visitation, both in visitor precincts and of more dispersed recreation across the parks, has not adequately taken into account the broader regional tourism and recreation context and what is being provided outside these two parks.
- Rather than over development, the growing tourism demand at high visitation areas can be eased by providing new nature-based visitor facilities in the Gardens of Stone State Conservation Area through the already funded establishment program of that new reserve. This was part of the *Destination Pagoda* visitor strategy which National Parks and Wildlife Service (NPWS) has broadly adopted.
- The NPWS' statutory requirements in managing national parks states that sustainable visitor or tourist use must be "compatible with the conservation of the national park's natural and cultural values". This needs to be reflected better in the proposed changes.

3. Overall comments on the structure, direction and content of the draft plan

3.1 Combined plan for both parks is acceptable

We support the combination of both parks into the one plan of management as logical for such contiguous parks, however combination has implications. There is a need to avoid 'lowest common denominator' provisions with consequent loss of precision. Strategies and actions should be distinguished for each park when appropriate.

3.2 Too much reliance on subsidiary plans

A national parks plan of management is a statutory document meant to protect the values the park was established to conserve. The draft plan contains much less conservation information about the parks than the existing plan and consigns the details to a separate Planning Considerations document. As a result, the plan is more like a visitor management plan without the context of the conservation values which have to be protected.

The draft plan suggests that many of the tangible management actions are to be found in subsidiary plans such as the Blue Mountains Pest Management Plan, Fire Management Plan etc. A number of these plans are outdated or not publicly available. Compared with plans of management, these plans are not statutory or accountable (i.e. legally binding), nor is public consultation always required in their development. The plan of management should specify the broad directions and priorities for all subsidiary plans to ensure public accountability.

3.3 The plan needs to be more specific

While the plan clearly articulates where some recreational activities are permitted or not permitted, it fails to state any positive goals for the protection of natural and cultural values or specific objectives in relation to the key threats identified. Many of the listed actions are not actions but strategies or underlying legal requirements that apply regardless of any plan of management. Vague statements in the Scheme of Operations about "monitoring", "measuring" and "auditing" need to be more precise about what will be done and how. It is concerning that most of the subject provisions are themselves so vague as to not be capable of being monitored, measured or audited. None of this improves on the current plan.

3.4 Development proposals are too vague

A plan of management should provide more detail on what is proposed, or excluded, for facility development within the term of the plan. If developments are already mooted, they should be specified. For sites where there are no immediate plans, limits to the extent of the site and types of facilities should be specified.

The draft plan has become less prescriptive and clear (compared to the current 2001 plan) and so gives NPWS and government more discretion particularly in relation to recreational uses and facilities. The draft plan includes a number of 'visitor precincts' which are vague and geographically undefined. While some are partly confined by urban development and topography, all should be legally delineated on a map. There appears to be little limitation on what could be developed in these vague precincts.

The statement (p.15) "there is potential for intensification of visitor use and significant new infrastructure and improvements will likely be within the precinct" provides very wide flexibility within the broad constraints of the *National Parks and Wildlife Act (NPW Act)*. The "potential for intensification of visitor use" is a generalised and pointless observation and not a statement of management intent. In fact, the term 'potential' is not an action for park managers (NPWS) but rather has no subject and reads more like an invitation for unknown bodies or people to propose activities in the park. The only use of the word "potential" in the *NPW Act* refers to actions Aboriginal people could take (S.72AA).

Each of these precincts needs to be legally defined with an explanation which either justifies or rejects further development. If further development is considered appropriate, then the types of development both considered and rejected should be specified.

3.5 The changed planning context should be recognised with specific responses

The context of this draft plan is important. The current plans for both parks date from 2001, so revision was long overdue. Since 2001 the operating environment and social and ecological context for the plans of management has changed significantly. Some of these changes are global while others are local. They include:

- accelerating impacts of climate change and biodiversity loss, and greater recognition of these threats in the community
- more severe bushfire events, which will possibly also become more frequent
- the introduction and spread of new invasive plants, animals and pathogens
- a large increase in visitation to the region with increased recreational pressure on parks
- major investment by government in visitor facilities
- a large increase in park management (ie. NPWS) resources and capacity
- increased commitment to environmental management by other agencies, e.g. local councils
- greater public recognition and support for Aboriginal involvement in park management.

The new plan fails to outline and respond to each of the changes listed above, specifically for these parks. The draft plan implies nothing much has changed since 2001. The draft plan as presented is a largely generic document, with generalised provisions that could apply to any conservation reserve. Given the importance of the area on so many measures, and the profound challenges for ongoing conservation, the quality and content of the draft plan is very disappointing.

3.6 Planning considerations need to be updated

While the 'Planning Considerations' supporting document is very useful and addresses some of the changes listed above, many of the references used are outdated, including the information on vegetation and visitor numbers. The document should be updated and revised to reflect the most important changes since 2001. For instance the International Union for Conservation of Nature (IUCN)'s *2020 Outlook Report* on the world heritage area has a comprehensive list of articles. The work of Science for Wildlife on the numbers, locations and health of koalas, recently listed as Vulnerable, is important and relevant local research. Similarly the work of Smith and Smith on gliders.

3.7 Climate Change not recognised as major threat to biodiversity in the national parks

Climate change is affecting biodiversity indirectly, for instance, through changed fire regimes and also directly through increasing temperatures and more extreme droughts, winds, floods etc. which are simply killing plants and animals locally. There is evidence that climate-induced changes have already occurred locally (e.g. local temperature records and eucalypt dieback associated with previous drought and heatwaves). The proposed plan should include this detail under threats. The two parks, if properly managed, are important for storing carbon. The urgent need to reduce greenhouse gas emissions should be included along with planned means to achieve such a reduction.

3.8 Response to World Heritage values is inadequate

During the years since the Greater Blue Mountains was included on the National Heritage List (2007) there has been a growing understanding of the importance of the geodiversity of the area. Advances in technology have supported a greater understanding, recognition and appreciation of the natural and cultural landscapes on a global scale. The additional values of Geomorphology, Aesthetic and Cultural Heritage have now been added for National Heritage listing consideration and assessed across the whole expanded area.

In 2000, the Greater Blue Mountains Area was included on the World Heritage list for its outstanding universal natural vegetation and exceptional biodiversity values. Cultural (Indigenous and historic) and scenic values were also nominated by the NSW and Australian Governments, but given the nomination was prepared in just six weeks, time defeated the effective justification of these important values. Also, at that time the World Heritage Committee was unready to consider cultural landscapes. These additional values should be supported in the draft plan for their intrinsic value and to provide more protection for the world heritage national parks including Blue Mountains and Kanangra-Boyd.

3.9 Environmental accountability is lacking

While the Society was encouraged to see previous announcements that the Blue Mountains World Heritage parks are to be included in the Ecological Scorecards initiative this current draft suggests this will not be a world leading exercise. The draft plan frequently refers to 'monitoring' with no detail on how this will be done. Is it just an occasional 'look-see' by rangers with no records maintained or a rigorous process using sound methodology with measurements, thresholds and responses? How will 'monitoring' meet or comply with the established State of the Parks and Ecological Scorecards evaluation programs?

3.10 The impacts of recreational activities are not adequately managed

The draft plan avoids the many ongoing and increasing impacts of various recreational activities. This applies particularly to dispersed activities that are not associated with hardened facilities, such as bushwalking, rock climbing, mountain biking and horse riding. Impacts

include cutting and creation of unauthorised routes and unauthorised installations. Inadequate management and 'turning a blind eye' to date has allowed these impacts to spread and has effectively encouraged poor behaviour. The Society recognises the difficulty of managing these dispersed and often unorganised activities, but effort should be made to engage with users and at least make clear what is not acceptable. The pressure on these parks so close to Sydney will only continue to increase and failing to effectively manage it is an inadequate response.

3.11 A better example

We draw the attention of the NSW Government to a contrasting example from Canada of management planning - the Yoho National Park Plan of Management. This plan demonstrates a far better end product and outlines an adaptive management process to support desired outcomes that is more detailed, transparent and accountable. (See copy attached). Below is an example of the clarity and specificity contained in the document.

Yoho National Park Plan of Management (extract)

Objective 1.1: The ecological integrity of forest ecosystems is improved through the restoration of fire disturbance (prescribed fire, managed wildfire), carefully designed forest thinning, native species planting, and control of high-priority non-native vegetation.

Targets

- As the capacity, protocols and interest of Indigenous partners allows, Indigenous knowledge and practices are integrated with western science and climate change studies into forest management and prescribed fire plans. Knowledge integration will begin with the initiation of collaborative round table discussions with Ktunaxa and Secwépemc peoples.
- By 2030, through prescribed fire and wildfire, 50 percent of the annual expected burned area (587 hectares/year based on long-term fire cycles) is achieved, in accordance with objectives and strategies outlined in the Fire Management Plan (Parks Canada 2019b).
- The trend of the ecological integrity condition measure for fire is stable or improving by 2025.
- Park visitors have opportunities to witness and learn about Indigenous burning practices

3. Specific comments on provisions of the draft plan

Our vision for the parks

Blue Mountains Conservation Society is supportive of the Vision as described. The plan needs to give effect to each component of this vision.

Why these parks are important

The Society supports this as a good summary. We note the following issues:

- The section of Wollangambe River that flows through BMNP is also a declared wild river.
- A section of the lower Kowmung River (above the Cocks River junction) which is now within BMNP was not part of the original wild river declaration when it was Sydney Water land. This section should also be declared as wild river.

- “Several fossil sites” is a misleading description, as fossils are widespread in certain geological units which are extensive within the parks, including the Illawarra Coal Measures and Lambie Formation. This point should be separated from the point about extant species with a long lineage.
- Blue Mountains National Park is the most visited park in NSW and almost certainly Australia.
- Re Table 1, “Previous Tenure” should include private lands (both parks include purchased lands).

1. Legal overlays and agreements

1.2 The Society notes the legal overlays, agreements and, in particular, the fact that both parks are within the Blue Mountains World Heritage Area and are of importance not just to NSW but have values of global significance. The draft plan should fully articulate how it will protect not just the listed World Heritage biodiversity values but also the integrity of the WHA. This plan of management is part of Australia’s obligations to manage the world heritage area. It should also recognise and describe the additional cultural and natural values that are currently being assessed for National Heritage listing, as a potential precursor to an expanded World Heritage nomination and articulate how these values will also be protected. Additionally, the 40,000 hectares of land which were added to the eight conservation reserves in the GBMWhA since its listing in 2000 should become part of the World Heritage Area. The Plan should recognise these areas as well.

1.4 The Society also notes that the draft plan’s area contains some of the most important declared wilderness areas in NSW and Australia. Statements like “Public understanding of the values of wilderness and the basis for wilderness management are promoted, and low-impact bushwalking practices are encouraged” are vague. By what mechanisms and actions will these aims be achieved? Management of these areas also needs to go beyond managing visitor use to ensuring that their integrity and values are protected.

Assets of Intergenerational Significance (AIS) are another legal “overlay” that should be explained in this section. These AIS are at specific locations in the national park and have their own conservation action plans under the *NPW Regulation*.

2. Caring for Country

It is disappointing given the commitment by government to joint management that the plan is silent on the process and consultation to be undertaken for this initiative and does not set any timeframes or milestones to be achieved. While “potential” is listed for several changes there are few direct commitments to actively pursue more comprehensive input or to identify any specific changes to management to better protect culture and connection.

3. Protecting the natural environment

This is one of the most important but disappointing sections of the plan. We note that these parks are earmarked for inclusion in the Ecological Scorecards initiative (<https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-management/national-park-performance-scorecards> last Updated 23 May 2023).

There are very few specific commitments to tangible management action in this section. While some specific values and threats are discussed, and vague assurances given that actions will be taken, the plan does not identify tangible targets or objectives in relation to the threats or specify priority locations. It is difficult to imagine how this section would meaningfully inform the Ecological Scorecards which are described as “annual snapshots of what is happening with native plants and animals, important ecological processes, and threats to ecological

health, such as feral animals and weeds.” It is also disappointing that there is no statement of how successful the current monitoring processes committed to in the current plan have been (for instance on recreational impacts) and what has been learnt in the last twenty years.

The rhetoric is impressive “*Measuring ecological health, and linking this to our investment in management actions, is the key to delivering effective conservation for our national parks.*” (Atticus Fleming, Deputy Secretary NSW National Parks and Wildlife Service). However the plan as it stands does not come anywhere near supporting the rhetoric. Generic statements are inadequate.

The plan states “To protect the natural environment of the parks, NPWS will implement fire, weed and feral animal management programs and implement priority actions for protection of threatened species and communities.” The plan also states “biodiversity survey, monitoring of ecosystem health and research to improve the understanding and management of park values are high priority management actions”. The document is loaded with these bland and vague statements about routine management that do not outline any aspirations or specify any priorities or success measures.

There are references to subsidiary plans that cover fire management and pest management. We note that the plan does not reference the most current version of either plan to enable easy access. The plan should include clear objectives, priorities and measures for any sub-plans, which are not in themselves statutory.

The Blue Mountains Fire Management strategy (accessed via <https://www.environment.nsw.gov.au/topics/fire/fire-management-strategies>) was published in 2004 and the Kanangra-Boyd Fire Management Strategy was published in 2006. Both these plans are well out of date yet critical to managing one of the greatest threats to the biodiversity of the parks, and their principal World Heritage value, especially following the widespread and devastating impact of the 2019-2020 bushfires.

The Blue Mountains Pest Management Strategy (accessed via <https://www.environment.nsw.gov.au/topics/animals-and-plants/pest-animals-and-weeds/regional-pest-management-strategies>) is the “Regional Pest Management Strategy 2012-2017: Blue Mountains Region”. This strategy is out of date and has been replaced by the:

- Greater Sydney Regional Strategic Pest Animal Plan 2018 - 2023 (accessed https://www.lls.nsw.gov.au/data/assets/pdf_file/0003/820794/greater-sydney-strategic-pest-plan-web.pdf).
- Greater Sydney Regional Strategic Weed Management Plan 2023-2027 (accessed via <https://www.lls.nsw.gov.au/help-and-advice/weeds-and-plant-diseases/regional-strategic-weed-management-plans>)

Both these Greater Sydney plans from Local Land Services (LLS) cover the two parks in this draft plan of management but do not provide a sufficient level of information on specific management actions required to protect the parks. The LLS plans provide umbrella information, but not specific planning on what is required to maintain biodiversity in Blue Mountains and Kanangra-Boyd national parks. A search of the documents reveals no specific references to either national park.

From our assessment, of the four subsidiary threat management strategies listed above only the Kanangra-Boyd Fire Management Strategy seems likely to provide sufficient detail to enable Ecological Scorecard reporting.

The reference to climate change in paragraph 9 (page 11) is inadequate. It only notes that climate change will affect hydrology and fire to place more pressure on “animals and their habitats”. This is just one potential impact of climate change amongst many, including spread of feral species and pathogens, survival of plant species, ecosystem change and even geomorphic impacts. The plan needs a comprehensive assessment and response to climate change impacts.

The International Union for Conservation of Nature (IUCN)'s independent Assessment 2020 *Conservation Outlook Report*, which regularly advises the World Heritage Committee on the state of each world heritage property, has some very pertinent conclusions following the devastating fires of 2019-20 and following floods.

“While management of the site itself and of the protected areas comprising it has been effective to date, the devastating fires in the Greater Blue Mountains in 2019/20 have raised new challenges for the World Heritage site. Better planning and adaptive management will be important to address threats, especially climate change and its unfolding effects including drought and uncontrollable fire. New management approaches to fire are needed, as conventional approaches are shown to be less effective than under previously experienced conditions.”

It is noted that Australia responded to the IUCN Outlook 2020 report. It is understood that these independent assessments of natural World Heritage reports are done every three years so a new outlook report must be due shortly.

Overall, the reduction of information on the natural environment unbalances the draft plan. Consequently, the focus on visitor management is more prominent making the plan more like a visitor management plan. The draft plan is the only statutory document that relegates so much other information to a subsidiary document. This downplays the importance of environmental information and probably means fewer people will read it. However the natural environment values at specific places are critical to any environmental assessments undertaken when NPWS is approving development in the park.

4. Protecting our historic heritage

This section also lacks detail and replicates the bland non-commitment of other sections. Paragraph 6 simply repeats mandatory and generalised management requirements, with no sense of what is considered the most important heritage themes or places, or which of them will be prioritised. Sections like this convey the message that NPWS has not even started to think about these issues, when we know that is not the case.

The important role of Blue Mountains National Park in the “development of the early conservation movement in New South Wales” is noted, but it should also be stated that this story of activism continued from then to the present day.

5. Providing for tourism, visitor use and enjoyment

In the current plan tourism management and facilitation is one of four major categories for the Use of the Park. These categories are

- Education, interpretation and promotion;
- Recreation in a natural setting;
- Scientific research; and
- Management operations of NPWS and other authorities.

What is now proposed is a larger focus on tourism whereas research, for instance, is barely mentioned unlike currently. The clear policy statements in this whole section in the existing plan are removed.

The proposed changes to the plan should start with a clear statement of the statutory responsibility that recreation uses lie within environmental protection. **Section 30E National Parks** of the *NPW Act* is clear about the relative importance, giving eight principles on how national parks are to be managed. The fourth principle is promotion of “public appreciation and understanding of the national park’s natural and cultural values” and, most importantly, the fifth one states:

“provisions for the sustainable use visitor or tourist use and enjoyment that is compatible with the conservation of the national park’s natural and cultural values”
(S.20E (2) (e)).

The existing plan recognises this more clearly and even states, that while NPWS has to maintain and improve its influence in the Blue Mountains tourism industry “It is also important the tourism industry is aware of the Service’s primary objective which is to protect and preserve natural and cultural features” (2001 plan at p. 50). The Society believes that this statutory proviso should be clearly stated in the changes to the plan.

5.1 Visitor access

We welcome the intention (paragraph 5) to use a range of strategies to cope with increased visitor pressure, other than ongoing expansion of facilities, particularly the promotion of public transport. However, options for new development has become dominant in the draft plan compared to the current one.

5.2 Visitor facilities

This section provides a clearer sense (compared to previous sections) of what management will be undertaken, in among the descriptive statements and generic commitments, via Tables 2 and 3. We note the inclusion of “No change” intentions (Table 3) and commend this clarity.

Visitor precincts and nodes. However, proposed changes to the scope of what can be done in the existing high use visitation areas of the parks is concerning and lacks detail and justification. The four recreational settings in the existing plan (Restricted, Wilderness, Natural and Developed) have been retained but developed areas becomes “visitor facility zones” and natural areas become “general management zones”. visitor facility zones cover visitor precincts, visitor nodes and camping areas. Table 2 lists the visitor precincts which are established main popular visitor areas such as Three Sisters, Govetts Leap and Evans Lookout.

What is new and concerning is the expanded purpose of these visitor facility zones. The stated purpose of the proposed new visitor precincts is to “To provide intensive visitor use and future visitor facility refurbishment and /or development”. (p.15) The types of possible facilities are not described and the footprint or physical extent of the zones is not delineated. Also concerning is the lack of detail / broad category of “other visitor nodes”. Visitor nodes have “potential” for upgrades and “a moderate level of new facilities”. It is unclear whether the draft plan allows for the addition of new visitor nodes.

While improvements in developed areas in the current plan emphasised disabled access, visitor safety and managing visitor impacts, this is not the focus proposed.

They will be able to provide intensive visitor use and future visitor facility development as well as refurbishment over an undefined area. Unlike the current plan the types of facilities are not described so the provisions are more open.

The Society notes the need for provision of facilities in high use areas but these needs should be specified for each place. The deferral of detailed site management to future unspecified “precinct plans” combined with the purpose (p.15) creates a ‘blank cheque’ for further development with no apparent constraints beyond the usual processes and national park and/or planning legislation. Environmental impact assessment (EIA) processes for developments on national park estate are not transparent. They are only placed on public exhibition at the discretion of NPWS unless the development is valued at more than \$5M.

Small developments on park typically invoke only a Review of Environmental Factors with no mandatory public consultation. An important purpose of a plan of management is to specify development proposals, not to obfuscate plans with maximum flexibility. Just because “potential” exists provides no justification to realize any such potential.

Blue Mountains National Park has long had the principle that accommodation can be provided off park in the many surrounding towns which are easily accessible from the many access points. This protects the natural values of the park. The existing plan recognised this :

“Facilities for tourism in the park are focused on the park’s natural environment eg scenic lookouts and associated walking tracks complementing the more developed tourism facilities and opportunities in the adjoining Blue Mountains City area. Resorts, caravan parks and other forms of built accommodation are available in the Blue Mountains City and are, therefore, not appropriate in the park.” (current plan at p. 55)

This is no longer in the draft plan. The proposed changes to the plan state that “at visitor precincts (in the park) there is potential for intensification of visitor use and significant new infrastructure (undefined) and improvements will likely be within the precinct” (p.15). This is far too open-ended. Expansionary plans for Govett’s Leap redevelopment, for instance, had to be wound back to a smaller footprint than originally proposed in the face of community resistance about its physical impact.

The precincts and sites are also completely undefined, and the map (Figure 3) is of limited usefulness other than to show general locations. The extreme in Table 2 is “Katoomba” precinct which includes “Narrow Neck” and “Three Sisters” visitor sites. Narrow Neck is actually a specific point on the Narrow Neck Peninsula, which has no present development beyond a management trail. We presume the intention is to refer to that part of Narrow Neck Peninsula between Cliff Drive and the existing gate, however this sloppiness suggests that the work has not been done to think through these visitor precincts and what might be required within them. This work needs to be done, and included in the plan. Otherwise the community is given no information on the management intentions for these important places, and potentially little to no input when developments are planned.

Each of these precincts needs to be geographically defined, on a detailed map, with an explanation which either justifies or rejects further development. If further development is considered appropriate, then it should be explained why and the types of development both considered and rejected should be specified.

The Society supports upgrading of existing visitor facilities in the Blue Mountains and Kanangra-Boyd National Parks with environmental assessment of impacts and where the need is well justified but not further development. Delivery of Destination Pagoda with the \$50 million allocated to the Gardens of Stone SCA to provide new nature-focused basic visitor

facilities is a low impact alternative to the damaging over-development zones proposed for Blue Mountains and Kanangra-Boyd National Parks.

Proposing increased development around the well known high use areas of the Parks is presumably a response to ever increasing visitor numbers. However, the potential to progressively degrade these areas' originally beautiful locations is real and cannot be downplayed.

Since "visitor nodes" are much smaller, the need for accurate delineation is less, but our other comments on precincts still apply. The statement (p.17) "At these locations there is potential for upgrades to existing facilities and a moderate level of new facilities appropriate to the local environment" is again very vague with no justification for why any such potential should be activated. Again no detail is provided for any of the nodes. This could conceivably be infrastructure (a broad term) needed for a particular recreation. A range of horse riding activities could seek enclosures, water, stands, etc. The ban on horse riding support facilities in Blue Mountains National Park's current plan (p.77) has been taken out for the proposed draft so it is no longer ruled out.

Mt Solitary Walk. The inclusion of the Mt Solitary Walk with new camp sites in the Jamison Valley is surprising, since this was not included in preliminary consultations with the community and the Society and the proposal had no public status prior to the draft plan. No rationale or supporting plan for this development is provided. This may be a worthwhile proposal, but the Society requests further information on the expected nature and scale of works proposed and limitations that will apply. We urge that built or semi-permanent accommodation be excluded, with the possible exception of Maxwells Hut.

Camping areas. The Society does not support the provision of platforms for camping on any Mt Solitary Walk or other locations without further justification in this environment (compared to the more vulnerable highland Tasmania, for example). Sites should be designated and maintained with as little hardening and external infrastructure as possible, particularly in wilderness areas.

Boyd River "facility Zone". We note that this site is in conflict with valuable natural and cultural resources, being a rare and disjunct population of *Eucalyptus macarthurii* and an Aboriginal site. We urge that serious consideration be given to moving the camping area, perhaps nearby to the 'Jensens' block, and subject to further assessment.

5.3 Bushwalking and camping

This section conflates the 120 km + 25 km of (constructed) walking tracks in the parks with the much greater length of unformed bushwalking routes, including the Kanangra to Katoomba walk which is an unmarked route (class 6), most of it through wilderness. The two 'track' categories need to be treated separately.

We again note the inappropriateness of including development of the Mt Solitary Walk in this plan without a rationale, further information and public consultation, and our concern about tent platforms and shelters.

Proposals for commercial serviced camping at some camping areas may have merit, however the draft plan again provides no rationale (beyond 'it's possible') or detail. The Society believes that camping opportunities for independent visitors should continue to dominate at all camping areas with any proposals for serviced camping to be subsidiary and subject to detailed planning and public consultation.

5.4 Cycling and 5.5 Horse Riding

The draft plan says that cycling is allowed on “designated tracks” and horse riding is allowed on “designated routes”. However, the process for a track or route to be selected and designated or authorised for either of these uses is not explained. It does not appear to involve any public consultation even though it could be a shared use. Will the other park users only find out if a new cycling or horse riding path is allowed when a sign goes up? If so, this is not satisfactory.

This is a reversal of the current plan which recognises the potential impacts of these activities, recommends monitoring impacts upfront and clearly states what is not allowed (pages 76 and 78).

Nor does the draft plan clearly set out a complete list of where various recreation uses are currently allowed. For instance, it says on page 21 that “Designated routes currently include the Riley Mountain Trail...” but what else is there?

It is concerning that cycling is apparently proposed to be allowed on management trails in wilderness areas through the same process of being signposted by NPWS (page 29). This would surely not be permissible under the *Wilderness Act*.

Along with some other recreations, the impact of informal cycling tracks is not recognised or dealt with. These have proliferated in parts of Blue Mountains National Park, including the Blue Labyrinth and south Grose areas, and have been ineffectively managed to date.

The National (Bicentennial) Trail which was developed for long range horse riding does pass through part of the area and should be shown on the maps.

5.7 Adventure recreation

This is a burgeoning component of visitor use of the parks. Canyoning and rock climbing mostly occur at places away from constructed facilities such as walking tracks and toilets and hence, with increasing popularity, can lead to serious impacts. These impacts include tracking, erosion and installation of permanent fixtures. The 2001 BMNP plan of management proposed close engagement with these recreational communities to manage and prevent such impacts, and it is the lack of effective management that has led to the ongoing expansion of impacts in many areas, such the Grose Wilderness and Narrow Neck. Deflection of management responsibility to users and self-regulation will be less successful without regular liaison. NPWS should not endorse a *laissez faire* approach and then have to repair impacts, which is the situation currently prevailing. Better management of these impacts is required.

6. Park infrastructure and services

6.1 The Society strongly supports the provision for no new park roads (p.23). Some guidance should also be included on upgrading the existing roads, eg. sealing.

The Society notes that management trails that are designated fire trails are subject to decisions and standards that are only partly within NPWS control. It is also noted that local bush fire management committees’ fire access and fire trail plans are not public documents. The designation and intended treatment of fire trails within national parks should be transparent. Many fire trails are important and popular recreational venues, eg. Woodford-Oaks, Burrumoko, Narrow Neck. Works on fire trails should take into account the recreational values, along with “natural and cultural heritage values”.

The Society strongly supports the provision for no new vehicle trails in wilderness (p.24), and the closure of any such existing trails not required for “necessary management purposes”. However we note there are a large number of existing trails in wilderness in the parks. These trails have significant impacts on wilderness values and other environmental values. The plan should specify a process and criteria for evaluating existing trails and scheduling unnecessary trails for closure.

6.2 The Society has no objection to the adaptive reuse of existing buildings where they are assessed as valuable and retained. Table 4 commendably includes intentions for park buildings.

7. Non-park infrastructure and services

This section could usefully include some of the detail from the “Planning Considerations” document on the type and scale of non-park infrastructure.

8. Authorised activities

Table 5 and Table 6 provide a clear summary of what activities are allowed or not allowed.

We query why research is apparently not permitted in Schedule 1 (p.28).

The installation of “bolts and other fixed protection” for rock climbing (p.30) is illegal under national park legislation. Rather than saying this may be permitted by consent, the plan should say it is prohibited without consent. Similarly, horse riding and cycling should also be described as prohibited without consent in certain circumstances.

It is not clear why “white-water boating” is prohibited only in Glenbrook Creek.

9. Scheme of operations

The Scheme of Operation purports to set “strategic goals and priorities”. This section again notes that some actions may be delegated to subsidiary plans.

The Society is disappointed that there is no commitment to making “subsidiary plans” (p.32) publicly available. We understand the need for these plans to be operational and adaptive and not necessarily locked into a statutory framework. However we suggest the statutory plan (ie. the parks plan of management), which is subject to regular if infrequent revision and mandatory public consultation, should include the main strategic objectives and direction of these plans.

This section (page 32) also states that outcomes and performance will be periodically assessed, measured and audited. This is strongly supported, however the regularity of such reviews should be stated, and they should be publicly available. Again we are concerned that much of the Scheme of Operations is too generalised and imprecise to allow meaningful measuring and auditing.

We are also supportive of the statement that “Review and assessments of performance will be used to inform adaptive management in these subsidiary plans as well as any required adjustments and improvements to future plans of management for the parks” (page 32). The Society suggests that a mechanism should be established to enable stakeholder input into these subsidiary plans and for participation in adaptive processes.

Table 7 sets out proposed outcomes and actions. Overall, these are non-specific and demonstrate no insight into the actual management requirements of there two parks. The

Society is disappointed that none of these outcomes would meet SMART criteria (Specific, Measurable, Achievable, Results-oriented and Timebound). This is partly because most of the listed “Actions” are not actions but objectives or strategies where SMART criteria cannot be applied. This again highlights the generality of the draft plan and its overall strategic nature (necessary and supported) coupled with a paucity of specific actions (not supported).

“Monitoring” is listed for many actions in the table. This is a vague let-out which history shows rarely happens. The table needs to specify exactly how monitoring will be done, what will be measured and recorded and how it will be evaluated and used for adaptive management. Furthermore, the plan needs to commit to ongoing long-term biodiversity monitoring using permanent skilled staff to carry it out.

Some priorities in the table seem poorly balanced. For example, every item listed for fire management (14, p.36) is assigned Very High priority, compared to wilderness priorities (2, p.32) which are given the lower level of High, even though two of the three “actions” are fundamental statutory requirements.

1 - 2. We note that meeting legislative requirements in relation to World Heritage and the Wilderness Act (p.32) would be better noted as minimum performance benchmarks rather than actions. We suggest that meeting legislative responsibilities for Wilderness can only be “Very high” priority. Action 2b lacks a priority, but it would reasonably be of lower priority.

4 - 5. The Caring for Country actions proposed (p.33) are slightly more specific than sections above them but would benefit from an edit to provide a more direct and active statement of what will be done.

6 - 9. Outcomes and Actions proposed for Protecting the Natural Environment (p.33-34) are generic in the extreme and of a form where they could be cut and pasted with virtually no need for editing into a document for any national park in NSW. A plan of management should be clear about priorities. For example which pest species are a priority for new work with LLS and neighbours?

Another example of a statement (8b) that would benefit from review is “Ensure fire management programs consider protection of biodiversity, cultural values, water quality, habitat connectivity and plant communities with limited ability to recover (e.g. upland swamps)”. Rather than ensuring things are “considered” we suggest it would be more appropriate to include an outcome that “Fire management will protect biodiversity, cultural values, water quality, habitat connectivity and plant communities with limited ability to recover (e.g. upland swamps).” And then add some specific actions that would help achieve this goal.

Rather than “Manage pest species in accordance with relevant pest management strategies, targeting priority threats and adapting to new information and emerging threats “ (8c) how about “Manage foxes at sites a, c, and v”. “Coordinate new regional strategy to limit incursions by deer” “suppress pig numbers in the x, y and z river valleys.

In terms of “Implement or support restoration and revegetation programs where required in priority habitats, including wilderness and wild river habitats, or where necessary to restore World Heritage and National Heritage values“ (8f), if areas require restoration or revegetation start by naming them.

The climate change “action” (9a) should be very high priority, given it is one of the main threats to park values and well-considered adaptive management is essential. “Consider” should be “assess” or “evaluate”.

There are no specific actions listed under 6 in Table 7 for the four Assets of Intergenerational Significance found within the parks: sites of Kowmung Hakea (*Hakea dohertyi*), *Solanum armourense*, Coveny's Zieria (*Zieria covenyi*) and Dwarf Mountain Pine (*Pherosphaera fitzgeraldii*). Such actions should be incorporated into 8a.

13 – 14. The new walking track as part of the mooted Mt Solitary Walk requires more justification and consultation as described above. None of the other proposed new tracks are addressed in the body of the plan and no justification is provided.

Action 14b should reference “traditional **Aboriginal** burning practices” to avoid confusion with what some might consider traditional rural burning.

Action 14d should specify a range of “hazard reduction” activities, including planned burning, slashing and other mitigation measures. (Most people think that hazard reduction only means burning).

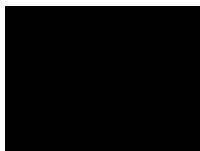
Action 14e is commended, but the issue is not only about park values. Rapid fire suppression is also critical in many instances to protecting life and property. This was amply demonstrated in the 2019-2020 fires where on-park ignitions led to some of the most damaging fires to communities.

Overall, the Society suggests that the Scheme of Operations is entirely inadequate to provide a tangible indication to the public of how the park will be managed and does not lend itself to accountability or effective adaptive management.

Conclusion and Recommendations

The Society's submission has set out detailed comments on the draft plan of management for Blue Mountains and Kanangra Boyd National Parks and put forward many recommendations which we believe would improve the efficacy of the updated plan of management, consistent with *NPW Act*, to protect these two much loved and important national parks.

Yours sincerely



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