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To whom it may concern

Establishing a Wollemi great walk - Draft amendments to plans of management for Gardens of Stone and Wollemi National Parks

The proposed amendments are intended to make permissible NPWS' plans for the route, use and management of a "Wollemi great walk" from Gardens of Stone State Conservation Area (SCA) to Newnes. The proposed amendments address the lawful construction of a section of the walk in the Gardens of Stone and Wollemi National Parks, user group sizes, construction material and a proposed shared cycleway/walking track. The Society's comments and objections to the proposed amendments are contained in the one submission as the amendments relate to the same objective.

Context of Gardens of Stone and Wollemi National Parks

The plans of management for both parks seek to protect these parks from overdevelopment or intrusive recreational facilities. Both parks have world heritage status as part of the Greater Blue Mountains World Heritage Area (GBMWH).

Since the plans of these two parks were made (Gardens of Stone in 2009 and Wollemi in 2001), there have been significant changes to the area where the proposed changes are located. Changes include:

- the accelerating impacts of climate change and biodiversity loss, and greater recognition of these threats in the community;
- more severe bushfire events, which are also likely to become more frequent; and
- the introduction and spread of new invasive plants, animals and pathogens.

Both national parks were badly burnt in the climate change induced 2019-20 fires. Since 2020 the International Union for Conservation of Nature (IUCN)'s independent assessment has rated the outlook for the GBMWhA as a “significant concern”.¹ These changes have led to Australia developing strategies to increase protection to manage the GBMWhA for climate change impacts.² Australia is required to report on these and other matters affecting the GBMWhA to World Heritage Centre (UNESCO) in the updated state of the conservation report due in December 2024.

It is not, therefore, the time to weaken park management protection. There needs to be a more precautionary approach to the proposed management plan changes limiting them explicitly to this proposed walk rather than being more sweeping. Otherwise, the plans could lead to possible changes and development in the future. The document for comment contains no justification for proposing these wider reaching changes. They are largely unnecessary to achieve the stated purpose of the proposed amendments, that is “achieving a Wollemi great walk”.

Proposed amendments Gardens of Stone NP POM

The Gardens of Stone National Park plan of management (POM) contains a strong appreciation of the significant conservation values of the park and recognises the importance of its World Heritage status. It contains a former nature reserve, Pantoneys Crown and its surrounds. In 2019-20 fires, 66% of this park was impacted by fire.³

Comments on proposed amendments

Section 4.3.1 Park promotion and recreation management

1. p.19 – remove final sentence, paragraph 2.

By removing 1, it is assumed that “Substantial increase” could now be expected “in the near future.

2. p.19 (Policies heading) Remove “recreational facilities” restricted to park edges statement

This proposed change is too sweeping and is not consistent with the nature of the GOS NP. The term “recreational facilities” is very broad. National parks can be used for many different recreations, including new activities, and removing this statement could lead to a proliferation in recreational activities.

¹ 2020 Conservation Outlook Report 2020

² As reported in UNESCO World Heritage Convention, State of conservation of properties inscribed on the World Heritage List WHC/23/45.COM/7B.Add, pp. 144-5 and

³ Smith, Peter and Smith Judy, *Impact of the 2019-20 Fires on the Greater Blue Mountains World Heritage Area*, 2020

The Society supports retaining the policy of that “recreational facilities will be limited to the edges of the park”. The plan could specifically refer to this one walk as the exception to preserve the park’s unspoiled natural scenic qualities.

The Society supports Wilderness Australia’s suggested wording in their submission at p.6.

3. p.20 - increasing group numbers from 12 to 20.

This proposal would be more sweeping than establishing the proposed walk requires and could lead to unforeseen consequences. Approving camping for 20 persons would have significant impacts and should not be allowed. For instance, groups of 20 persons camping on Pantoneys Crown (a former nature reserve) or on a remote escarpment edge could be very damaging. The ramifications of this proposed amendment have not been thought through.

The draft amendments document contains no justification for this broader change. The equivalence with Wollemi National Park is not convincing as Gardens of Stone is a much smaller area. The term “recognised trails” is not defined.

The Society supports retaining limit of 12.

4.3.3 Walking tracks and Bushwalking

4. p.22 - remove sentence restricting “formal constructed walking tracks” in the Gardens of Stone National Park

Adding a sentence specifically making permissible the proposed walking track is acceptable. However, the proposed amendments would also remove a general statement about “formal constructed walking tracks” being considered unnecessary in this national park. There is no information or argument to explain or support this change in park management policy. It is possible that the change is considered necessary to manage steep sections of the Wollemi great walk. The reason for this proposed weakening of the plan of management need to be made clear in the documentation for the amendment.

5. p.22 – amending group size

see (3) above. This is too sweeping and could have unforeseen impacts. It is meant to accommodate the proposed new walk. The document contains no justification for wider change.

Proposed amendments Wollemi National Park plan of management

Wollemi National Park is one of the largest national parks in NSW. It contains spectacular wild and rugged scenery, diversity natural environments, contains many threatened or restricted native plant and animal species and a range of important Aboriginal sites. It is the largest reserve in the GBMWA. 65% of Wollemi National Park was impacted by the 2019-20 fires.

4.3.3 Walking tracks and Bushwalking

(6) p.43 Remove fourth paragraph

Removing this paragraph could lead to future unspecified track development in this very large reserve. The proposed amendment is opportunistic and potentially damaging when the context is responding to the one proposed new walk. Change should be limited to acknowledging Wollemi great walk as an exception which needs to be carefully located and managed and maintaining the clear commitment to minimise intrusions into natural values and protecting wilderness. The proposed changes document contains no justification for this broader change.

The Society supports Wilderness Australia's proposed wording at p.7 of their submission.

4.3.7 Cycling (p.51)

(7) Adding text to permit cycling on "a shared walking/cycling track along the section of former railway line between Newnes campground and the Old Coach Road" and under Actions, permitting NPWS to upgrade the former railway line to a "shared walking/cycling track"

The Society opposes the proposal for shared use cycling with walking as they are not compatible. Shared use is unsafe for walkers and intensive cycling use damages the track and discourages walking altogether. This proposed former railway line is too narrow for these two uses to co-exist safely. Even on fire trails, which are much wider, the possibility of collisions still arises. Cycling can be a lot faster than walking and make little noise to warn other users, for instance, on blind corners. Cyclists do not necessarily stick to the left-hand side but choose a route depending on slope and camber.

Consequently, the Society does not support permitting NPWS to construct a shared use trail, just a walking track.

(8) Route of the proposed Wollemi great walk (Map p.6 Wollemi amendments and P. 5 GOS amendments)

The map states that the route on the map is only "indicative". It is understood that the requirements of the preferred tenderer for the section of the walk in the Gardens of Stone State Conservation Area has influenced the walk route. This is not an ideal approach. For instance, without these constraints a different route in SCA could have been devised which concentrated more on walking on Newnes Plateau with its characteristic and expansive distant views.

While final routes will be subject to environmental assessment by NPWS these processes are not transparent to the public nor necessarily open for comment.

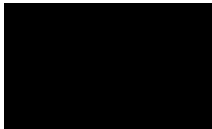
Objective of establishing “a Wollemi great walk”

The term “great walk” is not explained in the amendments nor in the related planning document. It can be a general term or it can relate to a recognised brand.⁴ In 2020 a preferred tender for the “serviced accommodation” in the SCA section of the Wollemi great walk was selected through a confidential Expression of Interest process under the previous government. The successful tenderer, Wild Bush Luxury, already runs two multi-day walks which are recognised as Great Walks of Australia.⁵

The Society is opposed to allowing public land to be leased for exclusive use of a commercial operator. National parks are public land and should not be privatised for private profit.

Thank you for the opportunity to comment on the proposed amendments.

Yours sincerely



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⁴ <https://greatwalksofaustralia.com.au/about-great-walks/> sets out the characteristics of walks selected to be “great walks”

⁵ <https://www.wildbushluxury.com/>