



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

April 18, 2017

General Manager,
Blue Mountains City Council,
Locked Bag 1005,
Katoomba, NSW 2780

By email: council@bmcc.nsw.gov.au

Blue Mountains Destination Management Plan (DMP) BMCS Submission – Part 1

Summary

- The Society opposes the DMP because of its insensitivity to the ‘bond’ between those living in the village-communities and the encompassing World Heritage Area; the City within a World Heritage National Park demands balance rather than unconstrained irresponsible growth.
- The DMP’s deficiencies arise through incomplete consultation, not looking beyond the Local Government Area, and unjustified assumptions about the village-communities’ ethos, Council’s limitations in relation to planning and land-use matters, the outstanding diversity of environmental values within the World Heritage Area, and physiographic constraints on construction.
- The Society rejects big-ticket items such as the proposals for Govetts Leap, a Destination holiday park, and Larger accommodation and conference facilities because they variously entail: the excision of part of the National Park for exclusive fee-paying use, alienating existing accommodation and conference facilities, engaging in activities which are not a natural fit to the region, clearing native bushland or taking over large areas of cleared public space, and being too large such that an imbalance is created.
- The Society welcomes the Great Walk **concept**, including the Grand Clifftop Walk, but opposes construction of chalets and ‘glamping’ facilities in Parks, and rejects walks which enter Wilderness, requiring inappropriate facilities, and creating excessive impacts.
- The Society supports **in principle** the upgrading of various ‘attractions/such as the Leura Cascades and Katoomba Falls Night Walk, but opposes the excessive deployment of landscape lighting on the basis that viewing the night sky is being compromised and nocturnal species are disturbed. In relation to the Mini ‘Vivid’ experience, the Society opposes this form of visual pollution and does not support its expansion in the ‘City within a World Heritage National Park’.
- The Society supports the Council’s limited upgrades at Wentworth Falls Lake, but opposes the additional suggestions in the DMP on environmental grounds and also due to their impracticability.
- Although many aspects of the DMP are disturbing from the Society’s viewpoint, many of the less grandiose ideas would improve the experience for visitors and should be implemented, even though they may not greatly increase visitation.

1. Introduction

The Blue Mountains Conservation Society (referred to as BMCS or the Society in this submission) has a membership which fluctuates in the order of 800. The membership is mainly drawn from the City of the Blue Mountains and the Greater Sydney region, but a scattering of members exists throughout NSW and also interstate.

BMCS is intimately concerned with the environment of the Blue Mountains Local Government Area (BMLGA) administered by the Blue Mountains City Council (BMCC). However, the Society's broader involvement is with the Greater Blue Mountains World Heritage Area (GBMWA) in terms of protecting its many parks and reserves; and beyond that, it has involvement through loosely associated groups, with state-wide environmental issues. BMCS is currently campaigning for the reservation of the Gardens of Stone Stage 2 (GoS2) Proposal over the western portion of the Blue Mountains and the Western Escarpment between Blackheath and the Capertee Valley. It sees these regions, although in adjacent Local Government Areas, as complementing and indeed integral to the development of tourism in the BMLGA.

Much of the Blue Mountains (Draft) Destination Management Plan (**DMP**) focuses in and around the many small village-communities which comprise the City of the Blue Mountains, a 'City within a World Heritage National Park'¹. It thereby affects the development of these urban to suburban centres, as well as the utilisation and economic exploitation of the natural bushland and scenery of the encompassing parks and areas of declared wilderness.

To deal with this dichotomy, the Society's submission will be forwarded to Council as two, somewhat overlapping but essentially self-standing parts:

**Part 1 concentrates on the encompassing regions; while,
Part 2 will look more at urban-suburban issues.**

2. Deficiencies of the process

2.1 Aspirational intentions

This partly reflects what the Consulting group was contracted to do, as set down in DMP Section 2.1 p17. Emphasis is on growth in just about everything, with a few 'sustainables' mentioned to give it pseudo-credibility. Thus, the aim is to sustainably grow the economy by growing sustainable visitation, solve the impediments to such growth by attracting external funding, and massage the community such that it embraces the grand vision. This is a 'desktop' exercise and absolutely ridiculous.

The use of sustainable is not clearly defined. Does it mean that the rate of growth should not outstrip available funds (economic sustainability), and not surpass the patience of the existing communities and the availability of support services such as schools and hospitals (social sustainability)? It certainly doesn't mean sustainable development as there is no attempt to consider the carrying capacity of the BMLGA in terms of physiographic limitations and compliance with fire regulations. Nor, when one ventures beyond the footprints of the separate 'village' communities, does it give any consideration to the environmental sustainability of the biota, yet much of the impact will be felt in the World Heritage Area and its encompassed national parks and wilderness.

The Society considers that the approach adopted is devoid of sensitivity and reflects a go-for-broke sentiment. Even though the DMP has numerous tables, diagrams and statistics, it makes little attempt to find out whether or not the existing services have slack, are at their upper limits, or are already inadequate. **The whole synthesis worships the concept that growth is good no matter how achieved!**

¹ This is commonly used, but the boundaries of the Blue Mountains National Park stop at the edge of the village-communities and the Great Western Highway easement - see for example <http://www.environment.nsw.gov.au/images/emb/0.36E.jpg>

2.2 The Restriction to the LGA

As the study was commissioned by the Blue Mountains City Council (BMCC), the restriction to the BMCC Local Government Area (LGA) is unsurprising and indeed mandated. However, such boundaries are an artificial construct, as has previously been recognized when Blue Mountains Tourism included involvement with Lithgow and Oberon Councils. Obviously, limits are necessary, but a significant part of the Consultant's exercise is to increase overnight stays. It should therefore be noted that, whereas the DMP sees proximity to Sydney as an add-on strength, in the context of overnight stays, proximity is concurrently a challenge.

One way of dealing with this aspect is to promote involvement with 'loop' tours from Sydney. For example:

- Jenolan Caves and the associated Karst Conservation Reserve, which was added to the NSW State Heritage Register in 2004, have been a focus for tourism for over 100 years. A loop involving several nights in Katoomba, a possible stay at Oberon, and then onto Jenolan before returning to Sydney, should be promoted.
- Likewise, Katoomba should be a natural 3-night stay en route to Lithgow and the Capertee region (or the Emirates Resort), before returning to Sydney either via the Bells Line of Road, or using a bigger loop through Kandos, Rylstone and the Bylong Valley.

Somewhat surprisingly, despite the 'Mts' district (mainly Mt Banks and Mt Wilson) being within the BMLGA, the Consultant has ignored it. Yet, particularly at Mt Wilson, the basalt-capped Mt provides a fascinating native biota juxtaposed with large gardens dominated by exotic species. This district is in many ways a scenic and horticultural oasis which could be an interesting part of 'loop' tours during the Spring and Autumn. Thus: a suitable 3-5 day 'loop' excursion could involve the Great Western highway to Wentworth Falls/Leura/Katoomba/Blackheath, with (say) 2-3 nights in Katoomba, then onto Mt Victoria, Bell and the Mts (and/or Mt Tomah botanic garden) with overnight in the Bilpin area, and then onto Richmond/Windsor before returning to Sydney.

BMCS contends that any 'plan' for BMLGA with intention to promote more overnight stays, should have investigated those Sydney-based organizations promoting more protracted 'loop' tours.

2.3 Limitations of consultation process

The Consultation List (DMP Table 31, Section 11.1) lists numerous local businesses in 10 categories. They comprise stakeholders, mainly obtained from Council's database, BMATA's database, and The Group's own contacts.

Notably absent from this list are:

- The Federal and State members of parliament – Sue Templeman, Senator Doug Cameron and Trish Doyle. All hold the welfare of the City of the Blue Mountains, and the preservation of the encompassing environment, as matters for which they should and do have much concern. The Society understand that Trish Doyle has contacted BMCC expressing concern at not being consulted about the DMP before the current public exhibition.
- BMCS – this is the principal environmental organization concerned with achieving a balance between the inevitable growth and associated pressures on the current way of life, and the impacts this may make on the natural environment; the latter is arguably the principal asset drawing people to the BMLGA.
- The Blue Mountains World Heritage Institute – this organization aims to study the impacts of such things as the growing villages, extractive industries, and other forms of encroaching development (e.g., widening of the new housing footprint) on the GBMWA.
- Local sports and other clubs (e.g., Wentworth Falls Tennis Club, Katoomba Tennis Club, Blue Mountains Dog Training Club, Football Clubs, Society of Mountain Artists, etc.) – most of these organizations are part of the enjoyment (even the ambience) of 'mountain living' – it is not restricted to Golf Clubs. Their facilities and viability will inevitably be affected by the scope of the DMP in

terms of increased traffic, additional demand, and loss of space should the need for visitor facilities, such as parking, encroach in any way.

- Meaningful indigenous consultation: the list cites the Aboriginal Advisory Council (actually the BMCC Aboriginal Advisory Council)². This is a bureaucratic construct designed to tick the box. BMCS remains unconvinced of the thoroughness of this element of the consultation process.
- Whereas there is extensive coverage of ‘Adventure’ organizations and various forms of ‘Accommodation’, there is seemingly little consultation with Sydney-based travel groups to test the add-on 3-5 day Blue Mountains self-drive³ or conducted tours; nor does the Society see any estimate of the rapidly expanding AirBnB type of accommodation.

2.4 Unjustified assumptions

- From the early history of coal mining at Katoomba, to the escape from Sydney’s oppressive heat in the period between the two World Wars, and the ongoing escape from Sydney’s overcrowding and brashness, residents of the Blue Mountains (a ‘City within a World Heritage National Park’) have had a strong awareness of their environment. This has never been more obvious than when confronted with the threat of the Western Sydney Airport. There is indeed a strong community awareness of the unique position of the ‘City’ and the importance of balance between retaining World Heritage values and enhancing visitation and its impedimenta.

The assumption that the DMP needs to build stronger local community awareness of the importance and value of the visitor economy (DMP Exec Summary p1) is therefore misplaced. It is an example of the consulting group having little understanding of why residents have chosen to live in the mountains. Residents are very aware of their heritage, and equally aware that retaining the amenity is contingent upon judicious development of the visitor economy. They are equally aware that rampant commercialization, as seemingly advocated in the DMP, would constitute a recipe for disaster. The Blue Mountains will not withstand crass overdevelopment either in the urban-suburban parts, or in the majestic scenery and encompassing bushland. **BMCC must preserve the all-important bushland between the village-communities, and the National Parks and Wildlife Service (NPWS) must reject any development of upmarket accommodation within the National Park’s boundaries.**

- The assumption that the GBMWhA could and should (DMP Exec Summary, Section 1.1, p1) “...rank as highly as other Australian iconic destinations (such as Uluru and the Great Barrier Reef) on global websites as a “must see” destination or significant site in Australia” is not justified, and should not be the parameter by which ‘success’ is measured. Furthermore, in making such a comparison, the Consultant is failing to distinguish between the BMLGA which encompasses the ‘City’, and the extreme diversity of values characterising the much more extensive GBMWhA.

As noted by the Consultant, the BMLGA’s very proximity to Sydney detracts from overnight stays. Many international visitors use day-trips from Sydney to ‘cover’ the GBMWhA; they see a few lookouts and perhaps Everglades, as well as spending a short time in Leura; they have neither time nor inclination to do more protracted walks. Only visitors with prior bushwalking experience, or seeking adventure activities are likely to remain for longer periods. The point being, that the GBMWhA, as expressed in the BMLGA, is a side-trip from Sydney; rarely a principal destination separate from Sydney’s diverse attractions. In contrast, Uluru-Alice Springs, and specific parts of the Great Barrier Reef, are destinations in their own right; they are part of plane-facilitated tours for overseas visitors to Australia, and part of a list of ‘must dos’ for Australians.

- Should funds be available, the assumption that providing the visitor-enhancing ‘improvements’ is within Council’s power is a misapprehension. The statement that the BMLGA (DMP Exec Summary, p2) “...requires enhancements to its product range, investment into new and existing facilities and investment into supporting infrastructure...” disregards BMLGA’s limitations.

² Blue Mountains City Council Aboriginal Advisory Council terms of reference, trim: 13/98539, available through: <http://www.bmcc.nsw.gov.au/yourcommunity/communityservices/aboriginalservices/bmccaboriginaladvisorycouncil/>

³ www.GreaterBlueMountainsDrive.com.au; and Touring Guide, Greater Blue Mountains, NPWS, ISBN: 0 7313 6765 0.

The reality is partly recognised in DMP Exec Summary, Section 1.3, Fig. 1, p3, in the context of challenges relating to planning and land-use issues. However, more explicitly, ‘eco-tourist facilities’ comprise ‘regional developments’ when the capital improved value equals or exceeds \$5 million. Such developments are determined either by a Joint Regional Planning Panel, or, if sufficiently large to be classed as a ‘State Significant Development’, by the NSW Planning Assessment Commission. These processes can be very time-consuming and costly; this does not necessarily endear a project to the private sector.

Comparable problems confront any commercial developments in the National Park, because such things are typically precluded by the Park’s Plan of Management. For a proposed development to even be considered, either the Plan of Management would need to be changed, or the land in question would need to be excised from the Park. Both processes are fraught with problems, not the least being that there would be intense opposition from environmental organizations.

The DMP deals with this aspect by saying that this (Exec Summary, p2) “...will require a commitment from the public (at a local, state and federal level) and private sectors.” Good luck!

- The final assumption deals with space for the types of large developments envisaged in DMP Exec Summary, Sections 1.6-1.8. The physiography comprises a remnant plateau, followed by the Great Western Highway and the Blue Mountains railway line, dropping away on both sides into deeply incised gorges below cliff-forming sandstones. The village-communities have developed on the wider parts of the plateau, such that room remaining for larger developments is scarce.

Each day, when the tourist influx arrives at Katoomba, Blackheath, Leura or Wentworth Falls, the existing facilities are near saturation. On this Easter Saturday, Katoomba and Leura were saturated and traffic was at a standstill. Similarly, on any weekend, despite Highway-improvements, long traffic-queues occur on the way up the mountains on Friday and Saturday, whilst the reverse occurs on Sunday as visitors return to Sydney. It is abundantly clear that increasing visitation (other than by train, should the trains be running!) will greatly exacerbate the problems. Visitation will quickly become self-regulating and platform-out as families opt to **not** spend half their holiday in traffic queues and choked attractions.

The question becomes why exacerbate the problem and create the types of congestion readily available in Sydney? **This is particularly pertinent when excessive visitation compromises the ambience of the villages, clutters the lookouts, and subjects the more popular tracks in the National Park to damaging over-use and noise-pollution.**

3. Unacceptable major and some supported minor ‘opportunities’ (opps)

The focus will principally be on those opps which are believed to negatively impact the National Park and the immediately abutting area. Reference to the DMP Exec Summary, Section 1.6, Fig. 4, p6 shows that the majority of ‘Village-specific’ opportunities are located in the Leura-Katoomba area with ‘outliers’ at Wentworth Falls and Blackheath. The remaining ‘Across LGA’ opportunities are mainly unlocated and to that extent difficult to evaluate.

3.1 Accommodation opps (DMP Section 1.6, Fig.4 and Table 1)

Three opps are identified and only two have a specific location. Aspects of these may be covered in the BMCS submission Part 2, but to the extent that they raise national park and park-periphery issues, they will be covered here.

Please note that in the ensuing subsections, the accommodation opp will be accompanied by pertinent ancillary proposals.

3.1.1 Govetts Leap chalets (8)⁴, viewing platform (9) and BMHC upgrade (10)

(a) Chalets (8) and viewing platform (9)

⁴ Number in brackets throughout this submission is as listed in DMP Section 1.6, Table 1.

The Society believes that there is room for improvements in this picnic area, but does not believe that the proposals (8 and 9) would provide it; they are opposed for the following reasons:

- The Society is opposed in principle to excising parts of any park for exclusive use, especially when the basis for exclusion is financial.
- The Society believes that if any such accommodation is built outside the park-periphery, it should be a private venture, and go through normal approval processes.
- The **fee-paying chalets** (8) would supplant what is currently free camping and family-friendly; were the NPWS able to improve the facilities from a **family-camping viewpoint**, that would be fine, but fancy chalets for the well-heeled are totally rejected.
- Govetts Leap is already a significant National Park site; it does not need to be turned into a money-making enterprise via a Public/Private Partnership (PPP) – this type of funding arrangement has not been a raging success, and even if it is a success, it is because it is being run at a price-level which gives a rate of return acceptable to the private part of the partnership – if it under-performs, there is usually something in the agreement that ensures the taxpayer carries the loss.
- Accommodation for those who wish to pay is available in Blackheath, Mt Victoria and Medlow Bath; the aim should be to enhance the attraction of existing accommodation, rather than steal some of its ‘bread and butter’.
- The **viewing platform** (9) is **opposed** because the natural views at Govetts Leap do not need to be enhanced (or spoiled) by a ‘not-so-cheap’ gimmick to be paid for by public funding – perhaps there would need to be a charge to cover the \$3.5m cost-estimate?
- The Society opposes cluttering the natural environment as a matter of principle.

(b) BMHC upgrade

The Society supports any improvements to the BMHC and notes that this would be a far better use of money than a viewing platform or chalets.

3.1.2 Destination holiday park (27) and Larger scale accommodation proposal (1)

(a) Destination park (27)

This comprises finding a site for a *“higher quality destination holiday park able to offer 25+ chalets, 80+ powered caravan/RV sites, 100+ camping sites, water features and other supporting infrastructure.”* The funding (private/commercial) is estimated at \$20m. Comments now follow:

- The Society opposes this and believes that those wishing this type of activity are better off going to Wet’n’Wild at Prospect, down the coast to Jamberoo, or up the coast to Gosford. The concept is totally inconsistent with a ‘City within a World Heritage National Park’.
- Most visitors to the region (apart from the ubiquitous eating) are there to view the scenery, experience mountain air and weather, and do some form of walking, if only along a few of the more popular tracks; engaging in activities which are not a natural fit to the region would defeat the whole purpose of coming to the mountains.
- Finding such an area, which would necessarily be in the tract from Wentworth Falls to Blackheath, is likely to involve clearing a significant area of bushland, or taking over a golf course or some other public space; the Society and local community would most likely oppose such a proposition.
- Again, there is an abundance of accommodation in the Lawson to Mt Victoria tract, and there are camping options on Newnes Plateau, as well as down in the Megalong Valley; the scale of the Destination Park proposal would keep tourists away from local small businesses and genuine mountains experiences.

(b) Larger scale accommodation and conference facilities (1)

This proposes *“...a 250-350 room property which blends in and complements the natural environment with an attached conference facility (650 – 850 max)...an outdoor amphitheatre...to hold outdoor concerts,*

plays and festivals etc. to meet a gap in the infrastructure available for outdoor events...” This is collectively estimated to cost \$122.5m, with \$100m being private/commercial and the remainder PPL.

The Society believes that a facility of this magnitude based in Katoomba (as proposed) would be a white elephant; it is not supported by the Society. There are existing (limited) facilities in the Fairmont, Mountain Heritage, Carrington and the Waldorf, whilst some outdoor events are held at Everglades. Potential for events also exists at the Leura and Wentworth Falls Golf Clubs, as well as at the Edge, Wentworth Falls School of Arts, Lawson Community Centre, and Katoomba High School.

Additional comments:

- The types of event envisaged are of a magnitude where they would swamp Katoomba were they to achieve the proposed capacity.
- The Society believes that a site for this proposal would necessarily involve forfeiture of public land and/or native bushland, and this would most certainly be opposed.
- The Society believes that were such capacity constructed, and were it able to operate on anything like a commercial occupancy rate, it would destroy many of the small accommodation businesses.
- It seems most likely that this expensive ‘thought bubble’ would never stack-up commercially.

3.2 Attractions and experiences opps (DMP Section 1.6, Fig.4 and Table 1)

Many of these will be considered in Part 2 of the Society’s submission.

In the ensuing subsections, the attractions and experiences opp will be accompanied by pertinent ancillary proposals.

3.2.1 Great Walk (2) and Grand Clifftop Walk (21)

(a) Great Walk Concept (2)

The Great Walk is essentially a concept in which commercial bushwalkers (doing it as a small business) are distinguished from independent walkers; the thrust of the Great Walk is towards those who wish to participate in walks guided by professional operators. A spectrum of potential walks is listed (DMP Section 11.7, Table 38, p170-174). Of these, The Society comments as follows:

- The experience of independent walks is what many value – **they are fully supported by BMCS.**
- Those same walks conducted by a commercial operator⁵ are termed ‘self-guided’ but are expensive and far from independent; your packs are transported for you, all your meals are provided, and ‘luxury’ accommodation is available each night in one of the villages. These walks are already promoted on the NPWS website⁶. BMCS acknowledges and supports these types of ‘tour’ because they enable those less familiar with bushwalking to gain experience, and they use **local overnight accommodation outside the National Park.**
- Between the two extremes in dot-points 1 and 2, is the type of experience proposed for the Mount Solitary & Kedumba Valley Circuit; it provides insight into the degree of ‘comfort’ envisaged (DMP p177). Thus, the overnight camps offer “...*the potential for establishing low impact eco-friendly chalets or glamping. The proposed sites are either current campsites or have had historical development and hence developing these accommodation options would not degrade pristine wilderness areas.*” **The Society recognizes that the sites are said to be degraded, but it is not prepared to endorse this type of walk.** Emplacing chalets or other forms of ‘glamping’ gear creates an unacceptable impact in iconic localities (e.g., Ruined Castle – see DMP Fig. 86, p177); this would be exacerbated by the chalets or ‘glamping’ tents being visible from the lookout at Echo Point.
- **The Society must remain vigilant in relation to walks entering wilderness and creating excessive impacts.**

⁵ <http://www.lifesanadventure.com.au/tour/self-guided>;

⁶ <http://www.nationalparks.nsw.gov.au/things-to-do/guided-tours/blue-mountains-5-day-walk>

(b) Grand Clifftop Walk (21) – DMP Fig. 85

This is included in the Great Walks category.

- **The Society supports this walk** – it has the advantage of being close to accommodation and food over much of the distance, and can be done as a series of short sections.
- There is concern that 21% involves walking along roads and parallel to railway lines, but that means 79% doesn't!
- There are murmurings about improving the walk by realigning the track to avoid roads, but this is unnecessary when track-work is needed in so many places.

3.2.2 Leura Cascades (18), Katoomba Falls Night Walk (19), Mini 'Vivid' (4) and Wentworth Falls Lake (12)

These have been grouped because they have much in common in terms of why the Society accepts certain aspects but is either hesitant, or opposes others.

(a) Leura Cascades (18) and Katoomba Falls Night Walk (19)

Council is already working, or has committed to work on these two aspects⁷.

KFN (19) involves the development of a 250m extension to Scenic World of the Katoomba Falls Night Walk comprising a 1.1km night-lit walk with landscape lighting of the gullies, falls and escarpments. The lighting will include white, multi-spectrum colour or projected lighting (DMP p95). The estimated cost is \$400k of public money.

LC (18) involves support for Council's upgrades to the Leura Cascades Precinct which may include a night-lit walkway, new lookout platforms (Elysian East, West and Olympian Lookouts), an upgrade of Solitary Restaurant, and new amenities (DMP p97). The estimate is \$4m of public money.

The Society notes that:

- Many come to the mountains to see the night-sky. Over the last 15 years (at least) the quantity of light created by Katoomba, Leura, Wentworth Falls and villages further down the Highway has increased enormously, thereby reducing the quality of the night-sky experience.
- Night-lit walks contribute to this problem. There is a case to be made for moderating this type of impact.
- A further concern is the impact of light and noise on nocturnal species – there is need to compromise.
- **The upgrades are supported in principle**, but BMCS believes that lighting should be switched off at a certain time each night, say 10 pm, or be greatly reduced in intensity. Obviously, there are safety issues and these must be managed, but there are also power savings to be made and the human species with money in its pockets should learn to appreciate more and destroy less.

(b) Mini 'Vivid' (4)

DMP p96 states: *"Given the success of the 2015 Culturescape event held at The Carrington Hotel, potential exists to expand the event to run the length of the main street of Katoomba and in other villages. The Culturescape event ran for one night in October and attracted some 2,000 people. An evening street market and the upgraded Katoomba Falls Night Walk could leverage off the light show."*

The Society's views are that:

- In view of dot-points 1-2 in (a) above, there is need to reconsider the extent of visual pollution caused by this type of 'experience'
- The need to provide such an 'experience' to attract visitors and stimulate business are understood, but at a cost-estimate of \$50k public funding, has any cost/benefit analysis been done on the 2015

⁷ KFN (19) is due for completion in 2017-18; LC (18) will potentially take place from 2019/20 onwards – cited in DMP footnotes 7 and 8, p8.

happening? And to what extent does the public funding cover the costs of any expansion to other villages and the whole of Katoomba Street?

- **It (the Society) does not support any expansion of this event, either in duration, or extension down Katoomba St and to other villages⁸.**

(c) Wentworth Falls Lake (12)

DMP p102: “...Council will complete an upgrade to the Lake. It will provide a path/boardwalk...a new car park including coach parking...as well as centrally located toilet amenities, with a completion date of 2018/19...it will provide an alternate toilet stop for tourist buses to ease the load on Leura...”

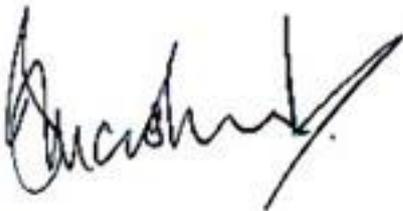
DMP pp103-4 suggests more changes including: seasonal recreational equipment for hire, such as paddle boats, stand up paddleboards, kayaks and canoes; introducing a seasonal pop-up cafe; and developing a range of “on lake” play equipment such as floating decks, floating trampolines and inflatable slides.

The Society is concerned with buses using the facilities unless they are small (16 seats or less) – crossing the bridge over the railway at Wentworth Falls could be a problem for large coaches. In other respects, it **supports the intention.**

The Society does not support the additional changes proposed by the Consultant. The area has an important swamp upstream – extra visitors could threaten it. Also, heavy use of equipment for hire and other play equipment could greatly increase the water’s turbidity, necessitate formal supervision, and risk losing the area to death!

4. Other ‘opportunities’ (opps)

DMP Exec Summary, Section 1.6, Fig. 4 and Table 1, pp6-10 lists many opps not covered in this submission. Some of those opps in Attractions/Experiences, Destination awareness, and Supporting Infrastructure may be dealt with in Part 2 of the Society’s submission, while other ideas and suggestions (such as Bike Station hire, a Blue Mountains Trail app, Katoomba Station visitor information, and improved signage) are sound and need no further analysis.



***Dr Brian Marshall,
For the Management Committee.***

⁸ This is based on environmental and cost considerations. It is appreciated that, in Sydney, this form of crass visual pollution has been greatly expanded and deemed a success. But the City of Sydney no longer has a night sky, is not the habitat of too many nocturnal species (humans excluded), and is not the ‘City within a World Heritage National Park’. The Council and its Consultant should give more thought to this.