



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

Date: 6 December 2017

A/General Manager
Blue Mountains City Council
Locked Bag 1005
Katoomba 2780
via email at council@bmcc.nsw.gov.au

Dear Madam

Draft Open Space and Recreation Plan

The Blue Mountains Conservation Society is a community based volunteer organisation with over 800 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 also runs an extensive guided bushwalking program, with approximately 150 guided bushwalks run a year, which are open to the general public. The Society therefore wishes to make a submission in relation to the recently exhibited *Draft Open Space and Recreation Plan*.

The Society interest is in nature-based recreation in bushland areas owned and/or managed by Council. Our submission is therefore limited to issues related to nature-based recreation.

The Society notes the following:

- The draft Plan identifies that walking for exercise and then bushwalking are the two most popular and most frequently participated activities across the Blue Mountains.
- The draft Plan highlights that many of the bushwalking tracks on Council managed and/or owned land are historic having been built in the 19th century and many are protected under heritage listing.
- Council estimates it manages over 130 km of tracks and 98 lookouts. An estimated 80% of these are in poor condition or failing, and there is insufficient funding to repair or replace the track surface and drainage or key infrastructure such as bridges and signage.
- A nice setting (bushland, views) were what people ranked the mostly highly in choosing where they went, followed by good paths or walking tracks.
- Residents nominated walking and bike tracks, followed by bushland reserves as

their highest priorities for Council's future investment in open space.

The Society believes that Council has done an excellent job in capturing the current profile of open space and recreational activities undertaken by the Blue Mountains community in Chapter 4.2 with the exception of walking (see below). However, in Chapter 4.1, while looking at demographic and visitor trends, the Plan does not identify emerging and new trends in terms of recreational activities and open space use. For instance, freedom camping in remote areas and free swimming in bushlands areas are identified later in the plan as emerging recreational trends but these are not identified at 4.2. Surely there are other emerging trends? The plan needs to identify up front at 4.2 the future and emerging open space and recreational activities trends (for instance increasing popularity of outdoor recreational classes such as yoga, boot camps or geocaching in bushland areas) and discuss how Council intends to manage these in later chapters.

Of real concern is while there were Special Interest Surveys for user groups such as dog off-leash, mountain biking, cliff sports, and sports clubs, there was not a special interest survey for bushwalking. This is very hard to understand and justify given bushwalking is the second most popular recreational activity in the Blue Mountains (after walking for exercise) and despite the existence of well established and accessible user groups in the form of bushwalking clubs in many Blue Mountains towns. Because of this the Society believe that Council does not understand the current profile of bushwalkers and the usage of bushwalking tracks, and has no information on the needs and views of bushwalkers. This is evidenced by the paucity of information on Walking provided at 6.1. In contrast the Special Interest Survey for off road cyclers has provided Council with extensive information on the needs and views of cyclers, as outlined as 6.1. This deficiency needs to be rectified.

Parallel to this there is an emphasis in the plan on cycling related outcomes and actions. For instance, the Plan identifies that opportunities for cycle related tourism are not well developed. However, the same could be said for walking related tourism. Similarly, the plan identifies the lack of formal facilities for each style of cycling – again the same could be said for bushwalking eg family or disabled walking tracks. This is despite the fact walking for exercise and then bushwalking are the two most popular and most frequently participated activities across the Blue Mountains. This reinforces the view that the Plan places heavy emphasis on outcomes for cycling in bushland areas to the detriment of bushwalking.

The Society has the following comments in relation to the identified Issues/Challenges and proposed Actions as outlined in the Plan on pp 49-53 and 75-78.

- The upgrade and maintenance condition of existing walking and biking tracks is not highlighted as a key issue in the Issue/Action tables – given that 80% of tracks have been identified as being in poor condition the Society sees this as a major oversight in the Plan. The Society believes track maintenance and upgrades should be given greater emphasis in terms of Actions, especially as funding is not available to upgrade all tracks.
- A key issue identified is the fact inadequate maintenance of walking tracks is impacting on heritage values. However, the Plan does not identify as an Issue/Challenge that inadequate maintenance is also negatively impacting on natural values such as water quality (through soil erosion, inadequate creek

crossings), native vegetation communities such as swamps (through vegetation trampling and soil erosion) and native fauna. This issue needs to be included and accompanying action identified.

- Council state they use a risk approach in terms of prioritising upgrades and maintenance but it is unclear whether this risk approach takes into account both public safety risk as well as environmental impact/risk. How is the risk prioritisation undertaken? How frequently? What factors are considered? None of this is not articulated in the Plan.
- The increasing use of what has traditionally been exclusively bushwalking tracks by mountain and downhill bike riders is a major issue in the Blue Mountains but it has not been identified as an Issue/Challenge. Shared walking and cycling routes are a public safety issue, results in user conflicts, impacts on bushwalkers and visitor enjoyment and results in negative environmental impacts as bushwalking tracks are not designed for cycling. Consideration should be given to identifying, signposting and enforcing tracks as either walkers only, shared tracks at all times, shared tracks at certain times only (eg cycling is permitted at certain times only, similar to the way some dog off leash areas operate) or cycling only tracks (such as the Lapstone Downhill Track).
- The Society agrees, as identified in the Plan, that the construction of unauthorised tracks is degrading natural areas and believes unauthorised track and other construction (dirt jumps, informal parking areas) is increasing. More proactive management in terms of signposting, closures and enforcement (such as surveillance cameras in problem areas) should be deployed.
- The Society agrees that the lack of clear delineation of responsibility for asset maintenance where Council, Crown and National Parks and Wildlife Service land interconnect is resulting in poorly presented access road, signage and other facilities. Rationalisation of management activities through shared contracting arrangements, such as road and track maintenance, should be pursued with other agencies (eg one agency grades a dirt road for its entire length even where it crosses management boundaries).
- The Society strongly endorses the statement in the Plan that the lack of formal adopted Plans of Management for many bushland reserves is hindering good management of these areas. This is set to increase as many Crown Land Reserves, determined to be of local significance, will be transferred to Council following agreement with NSW Government under the Crown land reforms. Plans of Management enable the community to have input into future management of bushland reserves, set clear limits on uses and provide a transparent and clear basis for future infrastructure investment. Without Plans of Management the management of bushland reserves can be ad hoc, changeable and captured by particular user groups. The Society believes there should be greater investment in developing plans of management for bushland reserves.
- The Plan states that detailed policy and procedures are required to guide development of volunteer programs for Park Care, and Track and Trail Care. It should be noted that existing Bushcare Groups work in many of Council's reserves, including on areas adjacent to tracks and trails. The Bushcare Network

should be consulted on any policy and procedures developed, including how existing Bushcare groups and any proposed Park Care, and Track and Trail Care groups will co-ordinate activities and ensure outcomes are not inconsistent.

If you have queries in regard to this submission please contact me on mobile 0412 428 202 or email president@bluemountains.org.au

Yours sincerely

A handwritten signature in black ink, appearing to read "Madi Maclean". The signature is written in a cursive style with a large initial 'M' and a trailing flourish.

Madi Maclean
President
Blue Mountains Conservation Society
mobile 0412 428 202 or email president@bluemountains.org.au