



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

24 April 2020

Grant Purcell - Ranger

Blue Mountains Branch

NSW National Parks and Wildlife Service

PO BOX 49

Blackheath NSW 2785

Via email: Grant.Purcell@environment.nsw.gov.au

Dear Grant,

Ngula Bulgarabang - Radiata Plateau Submission

As discussed with you via email, the Blue Mountains Conservation Society (BMCS) wishes to lodge a written submission in relation to the current park planning process. This is the written submission which you kindly granted an extension of time until the 24th April to supply.

BMCS believes that at this early stage of consultation that a written submission is the best means of stating the Society's stance on issues raised by the Ngula Bulgarabang proposal map and the community consultation questionnaire. The Society also has other concerns and issues it would like to raise in this submission.

The Society undertook a long campaign to have this land protected and added to the National Parks and Wildlife estate. The formal preference of the BMCS is expressed in the 'Society position statement on the classification of Radiata Plateau' that is an attachment to this submission. The Society believes the area should be gazetted as national park given its high natural and cultural conservation values.

BMCS also believes if the Ngula Bulgarabang becomes a Regional Park that the unique circumstances of this area be considered. The Society's view is that the park should not be promoted as an area for regional recreation or that recreation be the prime management goal of the Park, as is common in other regional parks. The recreational values of this park are local and should emphasise current uses, while being managed with an emphasis on the Aboriginal cultural and natural values of the park, including its unique flora, fauna and landscape.

Any expansion of recreational uses that may be envisaged for Ngula Bulgarabang are already well catered for in public lands found in close proximity. BMCS considers that the management plan of the park should emphasise the management of the current usages of the area and that the protection of the natural and cultural values of the area with minimal disturbance and upgrading of current facilities being the guiding principles.

Specific Concerns

The Society has concerns regarding the possible outcomes from the Ngula Bulgarabang proposal map and questionnaire and usage survey.

Ngula Bulgarabang proposal map

Mapping Errors

- The mapping does not reflect the bike and walking tracks that are currently accessible. Members of the society have recently viewed these areas to check the extent of tracks and identified inaccuracies on the map.
- Attached is an amended map that highlights where the BMCS has identified that the map is inaccurate. These inaccuracies include major areas of track that are no longer visible or usable on the ground (2.) and areas of tracks that are only suitable for bushwalkers which are shown as dual use for bikes and walkers (1).

Parking Lot – Indicated on Map

- BMCS strongly opposes the creation of a parking lot within the new reserve area. The reasons for this stance are for the following reasons:
 - The necessity to remove healthy native vegetation including mature eucalypt trees.
 - A carpark in the indicated site would eliminate lots of other native vegetation including terrestrial orchids and *Acacia asparagoides* (a wattle restricted to the Blue Mountains area).
 - High cost of construction of the carpark that could be spent on other management actions such as erosion control, Radiata Pine control, threatened species surveys, and signage etc.
 - The current carpark and turning circle at the end of Pulpit Hill Rd is capable of accommodating regular usage resulting from current recreational use of the park. The Society suggests that parking is accurately monitored prior to any future plans to modify the current parking arrangements. If increased parking is required NPWS should work with Blue Mountains City Council to formalise the parking at the end of the turning circle with marked car spaces and if need increased parking by removing the vegetation in the middle of the current turning circle.

Usage Survey

The Society is concerned that recreational uses that are not currently being undertaken within the park area were being included in the survey and that this was providing an opportunity to expand uses beyond those currently occurring in the park of these uses as legitimate recreational activities.

Horse Riding

- The Society is concerned that horse riding was raised as a possible use.
 - There is no recent historical use of the Radiata Plateau for horse riding purposes.
 - Horse riding would be in direct conflict with walking and dog walking that are the majority uses of the area.
 - Horse riding impacts by the spread of weed seeds, and increases possible erosion through the actions of hooves on track surfaces.
 - The Society opposes horse riding in the new reserve.

Mountain Biking

- Mountain Trail Bike (MTB) riding was also part of the residents' questionnaire and BMCS is concerned about this use being highlighted or encouraged.
- The Society considers that MTB riding, especially the creation of single purpose MTB tracks is not appropriate in the Park. The Society is strongly opposed to further tracks or roads within the Park.
- MTB riding conflicts with walking and other activities within the park and should not be promoted.
- It is noted that the tracks within in the park are not of sufficient length to attract MTB riders from outside the local area.

Dog Walking

- Question 8 of the questionnaire asks whether local residents support **ON** leash dog walking. As the Society's strong preference is for the area to become a National Park the Society does not support this outcome.
- However, if a national park designation is not achieved, and the area is gazetted a regional park, no **OFF**-leash dog walking should be allowed or contemplated.
- The Society also has a strong view that if the area becomes a regional park and dog walking ON leash walking is allowed that it be restricted to certain tracks, which would be clearly sign posted. This would assist in protecting rare native flora and lessen the well-known impacts of dogs in affecting the behaviour of native fauna. Environmental impacts of dog walking should be monitored along the designated tracks, and if needed track usage should be re-assessed. Dogs should not be permitted in the dam area.
- Signage and educational information on the impacts of dog walking on leash should be a priority, if the area becomes a regional park, as well as regular pro-active enforcement of on-lead requirements.
- Observations by members of the Society have indicated that:
 - Dog walkers often access the area by car and most are not immediate residents of the Pulpit Hill Rd area.
 - Many dogs are let off leash and that interaction of dogs often results in conflict. On the tracks there is little room for dogs or people to retreat in such situations. This may also impact on bushwalkers who may fear or not be tolerant of dogs.

- Studies have shown the impact of the proximity of dogs and dog walking has a negative impact on wildlife in a natural area. The following study illustrates the impacts:
 - A study undertaken in Sydney bushland by University of NSW researchers comprehensively outlined some of the problems of bushland dog walking. As reported in the Sydney Morning Herald of 6th September 2007 it was concluded that:

DOG walking should be banned in bushland areas where conservation is a priority - even if the animals are on a leash.

The biologists Peter Banks and Jessica Bryant examined the effect of dogs in bushland areas north of Sydney and found that the presence of the animals produced a 35 per cent reduction in the number of native bird species and a 41 per cent reduction in the number of individual birds.

*The study, published yesterday in the journal Biology Letters, found that the native birds were affected despite the fact the dogs used in the experiments were on leashes, and regardless of whether dog walking was common in the area. "It **clearly supports the argument that dog walking should be prohibited in areas where conservation is a priority,**" Dr Banks said.*

"It's like trail bike riding: it's going to have an impact on the species in the area and the other recreational users like birdwatchers and research."

(<https://www.smh.com.au/national/call-for-dog-ban-in-bushland-20070906-gdr1ip.html>) Also refer to the following website for more information on this study: <https://www.sciencedaily.com/releases/2007/09/070905095349.htm>

Rock-climbing

- The Society is also concerned about the designation of the south-eastern cliff edges as climbing locations. The reasons for this are:
 - This is where the most important and precious vegetation is found – *Pterosphaera fitzgeraldii*, *Leionema lachnaeoides*, rainforests etc as well as waterfalls and wet cliff faces.
 - This is also the area most visible from places like Cahills Lookout and therefore this area should remain as pristine as possible to preserve these views.

Infrastructure

- An opened ended question with suggested options was also asked regarding possible new infrastructure.

- The Society supports appropriate signage identifying the park and the marking of tracks and any signage required to restrict access to areas on an as needs basis.
- The Society is not in favour of a construction of a toilet block or any of the other facilities suggested due to cost and impact on the vegetation in the park. Many of the suggested facilities including tables and BBQ would increase management issues particularly waste management.

Pine Removal

The BMCS is a strong advocate for a Bushcare group to be established for the area and has an active interest in supporting such activities. The Society feels that there is a need for caution in tackling the large number of *Pinus radiata*. The Society supports removal of pines in an appropriate manner after the formulation of a Bush Regeneration Plan for the area involving community and specialist input from Blue Mountains City Council.

Some of the issues identified by Society members include:

- The large number of pines (alive and dead) in the park boundaries estimated to at least 7,000.
- Dangers in the removal and poisoning of the trees. For instance, chain sawing and fall hazards of dead trees.
- That there does not appear to be any current recruitment of new trees.

BMCS – Further issues for consideration

Landscape Elements

The Radiata Plateau is also a very important landscape element of the Katoomba and Megalong Valley areas. Any change in the use of the Plateau, including new visitor infrastructure, needs to consider the impact of the unspoilt views from Cahills Lookout, Narrow Neck and Megalong Valley. The Plateau needs to be considered in the larger context of the Southern Blue Mountains landscape.

Bushfire Planning

The Society has concerns about the impact of bushfire planning on the current track structure on the Plateau. These include:

- Will the tracks be designated as bushfire tracks?
- If so, what impact will this have on the current track network, will there be additional tracks created and or changes to the current tracks such as the width of the tracks, slashing of verges and the creation of turning areas.

State Heritage

An area known as Blacks Ladder is listed on the State Heritage Register for its significance as a traditional Aboriginal access route to the Megalong Valley. This area has a high usage by climbers and needs to be managed to limit any impacts.

Natural Heritage

Members of the Society have produced a report which highlights the importance of the natural and cultural heritage values of the area and why this should be protected. This report is attached to this submission.

This report importantly identifies that the area is home to two endangered species. The Plateau is only one of ten places where the highly endangered Dwarf Mountain Pine and the shrub *Leionema lachnaeoides* grow and is a stronghold for these critically endangered species.

The Society strongly argues that as a priority that comprehensive flora surveys to accurately map these threatened species and assess the health of the populations. Impacts of recreational use should be assessed.

Cultural Heritage

There are easily identifiable elements of cultural heritage related to the pine plantation that should be considered for preservation. Two items are the Bulldozer Track 'Seat' and Buick engine located on a stand, that appears to be for wood cutting purposes. As well as the Aboriginal cultural heritage assessment planned, a European cultural heritage survey should be also considered.

Further engagement

BMCS also believes that wider consultation should be undertaken to include the following stakeholders:

- The National Parks Association
- Nature Conservation Council
- Blue Mountains Bird Observers
- Upper Mountains Bushwalking Club
- Springwood Bushwalking Club
- Blue Mountains Historical Society
- Aboriginal community, including relevant Native Title claimants
- Rock-climbing groups
- Blue Mountains City Council.

Summary

Ngula Bulgarabang - Radiata Plateau is considered by the Society to be an outstanding natural and cultural asset due to its unique Aboriginal cultural values, and its flora and fauna and landscape elements. These elements may come under threat if the management of the park emphasises recreational uses over the current natural and cultural assets and the values they represent.

The management of the park should emphasise managing the current recreational uses, not expanding them. The Society strongly believes that a National Park designation is the best way to achieve that outcome. The Society strongly opposes a regional park designation that emphasises recreational uses, over the conservation of the area's natural and cultural values.

Attachments

- Ngula Bulgarabang proposal Map – Map supplied/Map as amended by BMCS.
- Amended Society position statement on the classification of Radiata Plateau
- The Biodiversity Values of Radiata Plateau
- Approved Conservation Advice for *Pherosphaera fitzgeraldii* (Dwarf Mountain Pine)



Tara Cameron
President
Blue Mountains Conservation Society
0419 824 974 taracameron4@gmail.com