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Nature Conservation Saves for Tomorrow

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24 June 2024

Dear Dr Dillon

Submission to BMCC Draft Destination Management Plan

The Blue Mountains Conservation Society is a community volunteer organisation with over 850 members, which has been in existence for over 60 years. The Society's aim is to help conserve the natural environment of the Blue Mountains and to increase awareness of the natural environment in general.

Please find attached the Society's submission to the draft Destination Management Plan. The Society thanks Council for the opportunity to make a submission.

If you have any questions in regard to this submission please contact me at mobile 0419 824 974 or email at taracameron4@gmail.com

Yours sincerely



Tara Cameron
Senior Vice President
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BLUE MOUNTAINS CONSERVATION SOCIETY SUBMISSION TO THE BMCC DRAFT DESTINATION MANAGEMENT PLAN 2024

Destination Stewardship Model

The Society has argued in many previous submissions that environmental sustainability should drive tourism development in the Blue Mountains. We believe Council has to seriously address the question: 'what is environmentally sustainable tourism in a World Heritage Area'?

This issue is highlighted in the *Greater Blue Mountains World Heritage Area Strategic Plan* (2009) which identifies one threat to World Heritage values as "inappropriate recreation and tourism activities, including the development of tourism infrastructure, under increasing visitor pressure from Australian, overseas and commercial ventures", and another threat as "lack of understanding of heritage values" (p.23). Further, the *GBMWA Strategic Plan* states that there is "some concern that benefits will not be evenly spread, that larger business interests may dominate at the expense of both Aboriginal tourism enterprises and smaller, locally based and more eco-oriented tourism enterprises and that a high turnover in tourism and hospitality operators (due to business failures) may be detrimental to the quality of visitor services" (p.36).

The response in this Plan to these issues is to adopt a Destination Stewardship Model framework. The Destination Stewardship Model is "a process by which local communities, governmental agencies, HGOs and the tourism industry take a multi stakeholder approach to maintaining the cultural, environmental, economic and aesthetic integrity of their country, region or town. In other words to ensure that the destination retains and enhances the distinctive attributes that appeal to both residents and tourists."

The Society is supportive of the Destination Stewardship Model if it's adopted with integrity and transparency and community and industry engagement "extends beyond the silo of the tourism industry". However, we note the Destination Management Plan was developed with key cornerstone partners (p5) which did not include any local environmental or sustainability NGO organisations, or representatives from the broader community sector such as Neighbourhood Centres, youth organisations or resident associations. This limited representation of interests, apart from the inclusion of First Nations representation, leads to a failure to seriously consider and take into account what 'sustainable tourism' actually means and looks like in a World Heritage area. It also produces very one-sided outcomes reflecting the economic interests of the tourism sector and displays a disregard and lack of understanding of the principles of Ecologically Sustainable Development. This limited number of partners also seems contrary to the Destination Stewardship Model.

'Business as usual' mass-market tourism in the Blue Mountains is arguably already unsustainable on the definition above, let alone with a projected range of 1-1.5 million *additional* visitors p.a. by 2038, a 33% increase on current annual visitation (p.52 *BMCC Visitor Economy Study*, 2019). Short term 'mass market' tourist visitation is already having a detrimental effect on the social, economic and environmental fabric of the Blue Mountains with crowding and traffic chaos at peak times, inadequate parking, waste disposal and toilets, and negative effects on residential amenity in places like Leura and around Echo Point and Lincoln's Rock in Wentworth Falls. Local residents have observed increasing poor bush toileting practice at popular sites in Blackheath and Wentworth Falls. Others report that they remove the rubbish (e.g. food and drink packaging) left by tourists at popular layovers and which is polluting bushland and creeks flowing into the national park. Other residents and visitors report that unregulated camping at Mt York camp ground is having an unacceptable environmental impact. Current visitor flow and management seems beyond the Council's

capacity to cope with, and this will only be exacerbated with the anticipated and desired uplift in visitation.

UNESCO, the administrator of World Heritage sites, has its own manual on managing tourism at world heritage sites, *Managing Tourism at World Heritage Sites: a Practical Manual for World Heritage Site Managers*: <http://whc.unesco.org/uploads/activities/documents/activity-113-2.pdf>. Even when this manual was published, in 2002, the problem of over-tourism and managing tourists at World Heritage sites was already emerging. The manual outlines the threats of tourism to World Heritage sites, including impacts on the local community, and proposes a set of strategies and solutions. These are similar to ones that are being implemented in non-World Heritage Area tourism 'hot spots' overseas. The manual also recommends developing assessable indicators of management objectives.

The Society would like to see Council working towards quantifying the concept of 'sustainable tourism' and developing measurable performance indicators related to defined 'sustainable tourism' objectives within the framework of Destination Stewardship Model. This will need to occur in consultation with relevant expert natural area managers (e.g. NPWS), universities, community bodies and the tourism industry. Council can be guided in this by UNESCO's *Managing Tourism at World Heritage Sites: a Practical Manual for World Heritage Site Managers* (above) and the experience of the only other city in a World Heritage National Park, Banff in Canada (see <https://banff.ca/558/Economic-Impact-Study>).

The sustainability measures of success and data sources on p16 of the Draft Destination Management Plan we believe are not sufficient or comprehensive enough. Additional sustainability criteria need to be developed and linked to existing reporting such as NPWS State of the Parks Reports to measure tourism impacts on the Blue Mountains National Parks, sustainability measures adopted by the tourism industry (e.g. waste recovery and recycling) and measures such tourism diversity. Measurements in terms of impacts on residents apart from housing availability need to be identified.

Funding the actions in the Destination Management Plan

While tourism and visitation bring economic development, including employment, to the Blue Mountains there is also a cost to residents in terms of funding tourism infrastructure and needs. This includes walking tracks, lookouts, toilets, car parking, visitor information, waste disposal and signage. The enormous cost of providing the infrastructure and staff to manage 'point focussed'/intense tourist visitation seems to be outstripping the Council's and ratepayers' capacity to fund, a challenge which is also facing Banff, Canada (see economic impact study above). The BMCS supports revenue-raising from tourists to fund infrastructure and better management of tourist facilities and visitor flows, rather than funding for tourism and visitation needs coming exclusively from rate payers. This is consistent with the goal of "tourism funds tourism" (p14).

The plan does not outline costings for the actions in the plan even if indicative only, nor where funding will be sourced. Vague references to "funding sources" without specifics is not enough. The Society strongly advocates that a budget and indicative costings of actions are included and where the funds will be sourced from. The Society believes further revenue should be raised from tourism and visitation including consideration of a bed tax on all tourist accommodation as well as other revenue raising proposals such as levies on short term accommodation provided in residential houses (Airbnb and Stayz etc), which is even supported by the industry (see SMH March 18, 2024) and is being considered by many local councils. Specific tourism revenue raising initiatives need to be included in the plan to fund the initiatives. As well, funds should be sought from the Commonwealth for tourism management given the impacts on the World Heritage Area of visitation and tourism.

Link between tourism and affordable housing

Data and information from the *Blue Mountains Local Housing Strategy 2020* (Blue Mountains City Council) and the Census 2021, Blue Mountains LGA ([Australian Bureau of Statistics, abs.gov.au](https://www.abs.gov.au)) indicates the following:

- In 2021, the Blue Mountains had a higher vacancy rate i.e. unoccupied private dwellings (10.5%) than the NSW average (9.4%).
- This is likely because people may own multiple properties which are not available for rent, such as a holiday home, or transition into retirement home. Another significant contributor to the high rate of unoccupied dwellings is the use of housing for short term rental accommodation, such as Airbnb, which has significantly expanded over the last ten years. In the Blue Mountains short term holiday rental accommodation amounted to 457 homes, one of the highest rates in the Greater Sydney area (SMH June 9 2024).
- Significantly higher vacancy rates occur in the upper Mountains - Blackheath/Mount Wilson has 26% unoccupied dwellings while Katoomba/Leura/Wentworth Falls has 18% (as compared to Springwood/Winmalee at 6%). Given the strong tourism focus in this area, use for short-term rental accommodation is likely to be a significant contributor to these unoccupied dwelling rates.
- There has also been a significant decrease in the availability of long terms rentals in the Blue Mountains. Rental bonds lodged between 2012 (5,622) and 2016 (5,380) indicates a decrease of 242 properties under long term rental agreements in the Blue Mountains in this period. This time period also correlates with the increasing use of online short-term rental platforms, such as Airbnb.

Housing availability and affordability is a significant issue in the Blue Mountains and the data indicates there is a clear link between the lack of housing availability and affordability, especially long term rentals, and the tourism economy. If a Destination Stewardship Model is to be adopted – with the goal that the Blue Mountains remains “attractive, authentic and sustainable” – then this link needs to be recognised. A lack of housing increases the pressure to further develop new housing, including in areas where urban growth cannot be environmentally sustained such as high bushfire risk areas at the end of ridges away from existing urban areas and in areas with poor infrastructure such as sewage and water. The Society believes that the community and Council need to consider ways to manage the growth of short term rental visitor accommodation provided in residential homes in the Blue Mountains, such as a cap on overall numbers of short term rentals or a cap on the number of nights a house can be rented for short term stays over a 12 month period as Byron Bay has implemented (which could mean long term rentals would be as profitable as short term rentals for landlords).

Additional actions to be included in the Plan

- A healthy and robust tourism and visitor economy in the Blue Mountains is also a diverse tourism economy, with small, medium and large tourism operators. The emphasis on ‘big tourism’ does not support local small and medium operators and does not bring diversity. The Society argues the Plan should not support further large tourist development (hotels and resorts) until a comprehensive accommodation study is completed which includes availability and occupancy rates for smaller operators. We have serious concerns, particularly in the face of persistent ‘big tourism’ proposals and the ongoing desire by the tourism industry to develop large-scale, top-end resorts on or near the escarpment areas on sites adjacent to the World Heritage Area or in areas of ecological significance (the zoo and hotel development at Wentworth Falls i.e. the ‘Croc Park’ being an example).
- There should be a clear commitment in the Plan that no alienation of public land will be pursued, including Crown Land or Council Reserves, to enable the development of

intensive, commercial tourist development. In addition, the Plan should commit to no development of 'Glamping', eco-lodges and other private high end accommodation within the Blue Mountains National Parks.

- The rapid dissemination of information by social media is promoting a rapid intensification of tourist numbers in previously less frequently visited natural places, especially those that provide views or water experiences. Often these are sites that have limited or no visitor infrastructure including adequate off-street parking, screening from local residences, stable well-maintained tracks and steps, and toilet facilities. Environmental impacts can be quickly apparent and seriously degrading, and local residents may experience considerable disruption and inconvenience. Recent examples of such sites include Little Switzerland Drive (Kings Tableland), Minne-Ha-Ha Falls (North Katoomba), Paradise Pool (Linden) and Peggy's Pool (Faulconbridge). Council and NPWS should commit to investigate the establishment of a system to monitor on-line social media sites to quickly determine special places being newly targeted by tourists and outdoor adventurers with a view to rapidly establishing visitor impact control measures.
- Blue Mountains is famous for its World Heritage environmental values, its scenic natural vistas and its Aboriginal cultural values. This is what draws tourists to the region and this is what the tourism sector should emphasise. The Society therefore supports the emphasis on increasing an authentic First Nations presence and experience into the tourism economy. There is an existing long-standing successful nature tourism sector focussed on bushwalking, guided tours in the spectacular World Heritage Area and birdwatching excursions, for example, and there needs to be greater recognition of the contribution of the already established nature-based tourism sector to the Blue Mountains economy. The Destination Management Plan should support an increase in environmentally and nature themed tourism including increasing events and tours such as environmentally themed conferences or tours (e.g. birdwatching tours and sustainable housing tours) as well as educational tours/seminars centred on environmental themes or Aboriginal culture. Some of these could be done as part of the Council's Planetary Health Initiative and conducted at the Planetary Health Precinct at the old Katoomba golf course.
- We need to be encouraging visitors and tourists to adopt a low impact, low eco footprint visitation model when they visit the region. The Plan should include an action to introduce an educational campaign, "Be an environmentally responsible visitor to the Blue Mountains", through printed material at accommodation and tourist information sites, through social media messaging during peak visitation teams and use of social media sites such as Ask Roz. The campaign could promote "Tread lightly" bushwalking, waste and litter minimisation and shop local principles. The Society would be keen to discuss this idea with Council further.
- The Plan identified the establishment of a Destination Stewardship Alliance as a priority. It's very unclear who will be part of the Alliance, how it will be funded, who the proposed MOU will be with and what the role and objectives of the Alliance will be. This section of the Plan needs to be much clearer as the Alliance appears to have a foundational role in the Destination Stewardship Model. It should also be noted, in terms of membership of the Alliance, that the Society's concerns in regard to the limited cornerstone partners which developed the Plan also apply here.
- The Plan quotes a number of statistics e.g. p9 but does not provide references or sources.
- Consideration of climate change induced impacts on tourism needs to be recognised in the Destination Management Plan. Landslides and rock falls, from climate change induced weather events, have resulted in multiple closures of well known walking tracks for major repairs and diversions in the most visited and highly promoted areas. This includes landslides and rock falls in the biggest tourism areas including at least 14 major track closures along the southern escarpment between Wentworth Falls and Narrow Neck (Katoomba) in 2019 to 2024 alone as well as closures of key roads (including Megalong Valley twice and Leura Cascades). Repairs to tracks and roads is resulting in multi million dollar costs. There have also been several landslides affecting the railway line in this same

time period, noting train is the major (and safest) transport option for visitors. Climate change is also impacting on visitor numbers as long and intense bushfire seasons where active bushfires are present significantly negatively impacts on tourism.