



THE COLONG FOUNDATION FOR WILDERNESS LTD.

Monday March 20th, 2017

Mr Robert Greenwood
General Manager
Blue Mountains City Council
Locked Bag 1005
Katoomba NSW 2780

Dear Mr Greenwood,

Submission as an objection to the Draft Blue Mountains Destination Management Plan

The words ecologically sustainable development are not in the draft plan, but sustainable tourism (page 2) and sustainable visitor growth (page 74) are, and both terms as applied in this draft plan ignore carrying capacity limits of the city's land base.

The concept of sustainability, which is vague at best, has been used as an excuse to overlook the hard realities of environmental science. Sustainability is completely dependent on scale and location, but the Blue Mountains detailed understanding of ecological and the community limits on what is acceptable are ignored by this draft destination management plan.

Large resorts and amusement parks are proposed without any strategic consideration of whether these are appropriate for the Blue Mountains. The draft plan has a grab-bag of tourist development proposals to double visitor expenditure. Its exclusive resort proposals would drag visitors away from small businesses, while its plans for increased coach-based tourism will place further cost burdens on council through parking and waste collection. Many of its proposals would degrade the World Heritage Area, as well as local town amenity, and it will certainly result in community opposition.

As Council, and most residents and visitors know, tourism in the Blue Mountains is dependent on its superlative natural environment, and can only continue as long as the bushland in the City is not consumed. For example, council must ensure the retention of the bush land between the towns if it is to not become seen as a suburban extension of Sydney.

While the tourism base has diversified it has not departed from its connection with the land base, and further to this the Mountains creative arts continually celebrate this connection. The draft plan ignores these relationships, and so Council should ignore the draft plan's advice for to do otherwise is to disregard your City's heritage, including your century of tourism heritage.

In this '**City within a World Heritage Listed National Park**', it should be a given that tourist and other uses areas cannot occupy bushland without degrading it. Bushland must be kept as uncleared and

interconnected for tourism to remain “sustainable” in the sense of the Blue Mountains remaining a place where people come continue to enjoy nature.

The vision of your community being as one in the national parks, and there are of course many variants of this theme, has been completely ignored by the draft plan. The disregard for the framing principles of development regulation in the Blue Mountains makes the draft plan flawed. National Park plans of management were also ignored. This disregard of plans is possibly deliberate, as perhaps the next aim of tourist industry players, like the Tourism Transport Forum, will be further removal of development constraint in the Blue Mountains.

The draft plan misdirects Council and other tourism stakeholders regarding investment, marketing and promotion proposal for the Blue Mountains because it ignores the planning context. Its only aim is to increase overnight visitor expenditure, a NSW Government goal, regardless of the wishes of the community or the needs of the natural environment. The draft document is almost worthless as it has no respect for the Blue Mountains vision as a City within a World Heritage National Park.

Relationship of this draft plan to planning powers

Tourism developments, being in popular locations by definition, need to be adequately considered by regulatory agencies through open, transparent public processes that ensure proper review. It is of concern, then, that all but the smallest scale of proposed tourist development have been taken out of the hands of Blue Mountains City Council.

Council would be very well aware that the definition of “eco-tourist facilities” under planning law falls under “regional development” when it has a capital improved value of only \$5 million. Such regional development must be determined by a Joint Regional Planning Panel or Sydney Planning Panel, unless it is a large development when it becomes a ‘State Significant Development’ and determined by the NSW Planning Assessment Commission. So after the proposed rezoning of land for tourism, Council does not control or regulate development.

The draft Blue Mountains Destination Management Plan is intended to attract development proposals by powerful interests to the Blue Mountains. The draft plan could perhaps influence determination by planning panels, if this draft plan became a quasi-planning document for consideration by these determining authorities regarding future developments on the proposed tourist sites that are currently on public exhibition.

The draft plan encourages inappropriate development of popular destinations with high conservation values. It proposes inappropriate development reminiscent of the 1960s when Oswald Ziegler proposed a ‘Pioneer Village’ resort on public land at Govetts Leap, complete with large scale models of extinct creatures and faces of explorers carved into cliffs.

The Colong Foundation for Wilderness requests that the draft plan be formally rejected by Council as not in keeping with the council’s corporate vision for a City within a World Heritage National Park.

Problems of bus-in/bus-out day visitors poorly addressed

Echo Point, Katoomba, has the greatest nature-based visitation in NSW at any single point, reaching well over two million a year but such numbers return almost nothing to Council parks or to national park management. These visitors are spell bound by its world famous view and wonder how could so much wilderness possibly exist close to Sydney, yet this draft plan could erode this heritage with proposed development (e.g at Ruined Castle).

Blue Mountains City Council subsidises visitor services provided to the Echo Point bus tourists and gains nothing from those who use the lookout, while bus operators run their business using these popular attractions. The draft plan fails the council, the community and the environment by not resolving this funding problem in a way that is acceptable to the community.

The draft plan instead proposes to facilitate bus-in/bus-out day tours, including foreshadowed capture of cruise ship visitors. Providing layover for twenty or thirty buses visiting Katoomba and Leura as mentioned in the draft plan will be unwelcome if it means more buses.

Plans for more visitor car parking for Blackheath, Scenic World, Leura and Wentworth Falls also need to be carefully assessed and publicly reviewed or the city's suburban streets will become clogged with milling visitor traffic.

A new visitor traffic management plan for buses and cars is needed but not proposed, let alone outlined in the draft plan.

The draft plan's proposed ways to help day visitors get to walks when they arrive is a helpful suggestion. If these future visitors can then grasp that the city has great restaurants, entertainment and frequent cultural events, as well as authentic recreation in nature opportunities, then this is surely the winning combination for increasing overnight stays. This strategy in the draft plan requires further elaboration to ensure the goal of overnight stays compatible with the vision of being a City within a World Heritage National Park.

Inappropriate large-scale development

The mooted large 'game changing' tourist developments could swamp the community and authentic Mountains tourism experiences with crass tourism. The draft Destination Management Plan sloppy set of "good idea" copycat proposals that would, if adopted, destroy the region's natural assets and its planning vision.

Copycat game changing tourism developments are self-defeating as the tourist levels will probably decline as the more discriminating visitor seek will more authentic experiences elsewhere.

The Fairmont Resort or Hydro-majestic also would not support a "internationally-branded" 250 room resort proposal with 650 to 850 people conference theatre and a 2,000 person outdoor amphitheatre complete with a three storey carpark (Table 1, page 7 and Table 2, page 12). [How outdoor entertainment could work in winter is one of the draft report's unexplained thought bubbles.]

The draft plan contains a proposal to diversify outdoor tourism with a six hectare Destination Holiday Park with 25 cabins, 80 caravans and 100 campsites supported by gimcrack outdoor amusements such as a gondola ride, zip line, luge [toboggan] experience, BMX track and mini golf (Table 1, page 7 and Table 2, page 12 and page 77). These all-inclusive tourist destinations are foreign to the Mountains and tend to keep tourists away from local small businesses and genuine Mountains experiences.

The proposed Destination Holiday Park is inconsistent with the overall vision of a City within a World Heritage national park and would see six hectares of bushland degraded.

Inappropriate proposals for the World Heritage Area

The draft destination management plan includes an unacceptable proposal for 8-10 chalets on Govetts Leap picnic ground, complete with a wow-factor cantilevered viewing platform for the adjoining lookout. Another cantilevered lookout is proposed at the Leura Cascades. The Govetts development would replace free public use of this wonderful picnic ground and lookout, with fee paying tourists. The proposal drives away from the picnic ground those who could not afford to pay, such as family groups. These proposals are not good solutions to the problem for recovering council costs, as it privatises public land.

This picnic ground alienation is not justified by what would be a small revenue stream back to national parks, while the Government is expected to pay up front for this cabin and cantilevered lookout development under a public private partnership (PPP).

Applying a PPP model to protected areas [national parks and council's public reserves] is subversive of good governance and the conservation imperative of parks and reserves. The protected area context is entirely different from other contexts where PPPs have been successfully applied, such as for sewage treatment works. The commercial interest is hostile to natural heritage conservation. It may work for built destinations like a museum and a zoo but not for a bush reserve when the development clears bushland or occupies public parkland for the exclusive benefit of a private resort.

Community hostility towards this Govetts proposal will no doubt damage the credibility of this draft tourist industry plan. It demonstrates that its authors have thought little beyond turning a private profit from a much-loved public asset so as to meet the NSW Government accommodation goal.

The Colong Foundation is confident that the Govetts resort proposal will be opposed by Council. It is of course equally of concern that Council cannot be the determining authority for such an eco-resort proposal, which underscores why this draft plan must be rejected.

Solitary no more

More disturbing is the draft plan's speculative proposal for eco-lodges or glamping at Ruined Castle, by the Kedumba River and below Leura Falls, on the proposed Great Walk over Mt Solitary and

around Kedumba Valley (page 174). If these 'eco-developments' were built, future visitors who look out from Echo Point would have their pleasure of seeing wild land spoiled.

The proposed 'Great Walk' would displace existing campers at the Ruined Castle with those who can afford to pay thousands of dollars for a three day walk.

The absence of resorts in Blue Mountains national parks is described as an 'absence of overnight in-park trekking' (e.g. page 75) which should alarm bush walkers. Over the last century bush walkers have not found any difficulties with overnight accommodation in the southern Blue Mountains, including on Mt Solitary but they would if these developments proceed.

No social licence for national park development

Previously national parks in Australia didn't need processes to regulate private development because there was broad political agreement that parks are off-limits.

The implicit assumption of this draft destination management plan is that this prohibition is no longer the case in the Blue Mountains, and on this presumption the authors of the draft plan are wrong. The resort proposal for Govetts Leap picnic ground and the Great Walk with cabin or glamping development proposals have no social licence in the Blue Mountains. They propose alienation of national park land for future profit by private developers will be rejected by most residents, and especially at Ruin Castle and Govetts Leap.

Requested actions

The Blue Mountains community has built up, with some notable deviations, nature-focused tourism. It has for over a century generally headed toward forms of tourism that respects bushland.

Blue Mountains tourism must ensure that national parks remain sacrosanct, with no on-park (or on-reserve) development apart from walking tracks and basic visitor facilities around the edges. The promotion of walking tracks, picnic grounds and magnificent scenery has maximised everyone's joy in nature, while preserving parks and reserves. Council must reaffirm that it will help the community to hold to its tourism vision that it built up over a century and now is manifest in its City within a World Heritage National Park slogan. Promoting this vision will, if properly marketed ensure visitors are not trapped on Sydney-based day tours, but liberated to enjoy the walks, tours, rides, cultural events and restaurants the Blue Mountains offers. The unique cultural diversity that works towards being compatible with nature and World Heritage is what makes the Mountains special. Let's work make the City even more so, and then more visitors will have authentic experiences and more demand more night stays.

The Colong Foundation for Wilderness requests that Blue Mountains City Council support:

- Better funding, communication, promotion and integration of existing facilities and events compatible with the nature-focused vision of the Blue Mountains as a City within a World Heritage national park.

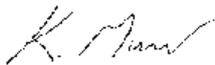
The Colong Foundation for Wilderness requests that the draft Destination Management Plan be formally rejected by Council as not in keeping with the council's corporate vision for a City within a World Heritage National Park.

If the Council will not reject the entire draft plan, the Colong Foundation for Wilderness requests that Blue Mountains City Council resolve to oppose this draft Destination Management Plan's proposals:

- In national parks, including built accommodation and intrusive infrastructure, such as large car parks and wow-factor cantilevered lookouts; and
- For "Game changer" tourist over-development, particularly in bushland areas, including the proposal for an unnecessary "internationally-branded" 250-350 bed mega-resort and conference centre, and an exclusive six hectare Destination Holiday Park; and
- Excessive and episodic surges of bus-based day tourism from Sydney that spoils the experience for everyone and costs the council money.

Thank you for the opportunity to oppose on the draft Blue Mountains Destination Management Plan.

Yours sincerely,



Keith Muir
Director
The Colong Foundation for Wilderness Ltd