



**THE COLONG FOUNDATION FOR WILDERNESS LTD.**

Monday August 26<sup>th</sup>, 2019

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Dear Sir/Madam,

**Objection to the draft amendment of the 2010 Ben Boyd National Park and Bell Bird Nature Reserve Plan of Management and the accompanying Light to Light Walk strategy**

Please review the draft plan amendment and remove all the visitor accommodation proposals, beyond adaptive reuse for existing heritage buildings.

Please do not realign the traditional walking routes that pass through this national park which have been used by Traditional Owners for millennia, such as the walking track through heathlands from Green Cape to Bittangabee Bay. The proposed walking track realignment generally follows the coastal ecotone boundaries, for example, beside the tall paperbark (*Melaleuca armillaris*) tall shrublands. A walking track along the proposed alignment disrespects the traditional route and will cause dieback in iconic coastal plant communities. The retention of the traditional route will be less damaging, and avoid unnecessary and costly track diversions.

The proposed track realignments will damage coastal vegetation communities where new works will allow wind and salt to get under existing shrub and tree canopies. The claimed environmental benefits of avoiding heathlands will be cancelled out by environmental damage and the loss of generally stable, traditional Aboriginal walking routes. These established routes are part of our heritage, cause little disturbance to parrots and should be retained.

The proposals for new commercial accommodation are inappropriate. The exclusive nature of these will result in less people using this national park, particularly due to the proposed denial of pack camping and through walker usage of the general areas where the accommodation is proposed to be located.

The proposal to build visitor accommodation and camping platform facilities will have an adverse impact on the community's cultural relationship with this national park by imposing a commercial relationship on visitors who now stay overnight. Self-reliant visitors, including those who are

walking through this national park as part of a longer walk, will instead curtail through walks at Wonboyn to the south. Banning through walks in Ben Boyd National Park will reduce opportunities for experienced walkers on the Wilderness Coast.

The fees and charges for commercial operations proposed to be located inside this remote national park will cause the majority of potential 'free walkers' to effectively be denied park access. Free walkers, also known as pack campers, are proposed to be confined to bookable and rentable camp platforms or to inferior camp sites at Saltwater Creek and Bittangabee Bay, even though existing use at those sites has not caused the claimed significant environmental impacts.

These proposed plan amendments will establish a costly user-pays scheme that will drive existing visitors away from this park, all to enable a new commercial operator to try to make money by charging higher prices for platform camping or hut stays. This arrangement will also disadvantage existing commercial operators who will not have access to the new accommodation facilities.

It seems that these proposals have been mooted because some in NSW Government and NPWS are desperate to join the 'iconic walks club'. I doubt facts or analysis have had much to do with the development of the Light to Light strategy and these proposed amendments.

For the above reasons, the Colong Foundation for Wilderness objects to the alleged walking track improvements and commercial accommodation proposed at Hegartys Bay and Mowarry Point in Ben Boyd National Park.

As predicted by the 2010 Colong Foundation's submission on what is now the current plan of management, the *'self-reliant visitor will be restricted and displaced by commercial operations ... Commercial interests will tend to benefit from any increase in regulation to the disadvantage of the self-reliant visitor that would tend to be displaced from the best camp sites by the profit making operations.'*

These restrictions have nothing to do with alleged overuse, but are driven by economic motives for exclusive use of the national park – in other words, by park privatisation for the exclusive few.

These draft plan amendments and proposed works are incompatible with the desired management goal (as stated in the strategy) of maintaining the 'remoteness' of this park, or ensuring its tourism branding as a part of the Wilderness Coast.

As the National Parks and Wildlife Service will know, remoteness is defined as a character of the undisturbed natural environment that creates a specific visitor experience. Remoteness in the Light to Light Strategy is considered merely as a marketing tool for branding the visitor experience. Economists and tourism developers may think that marketing outcomes are separate from nature, but good park managers would never make such an error.

The draft strategy reveals that 'market testing *will occur* to investigate the level of commercial interest in the market to facilitate and support relevant visitor experiences on the Light to Light walk' (section 5.1, page23). This admission is a sad reflection of the current state of the NSW National Parks and Wildlife Service.

This statement confirms that the Light to Light Strategy and draft plan amendments are not based on market analysis of existing park visitor use and on an adequate economic modelling to determine whether a return on investment of \$7.9 million is likely. Specific non-market benefits, such as actual environmental improvement, have not been identified and mapped to justify this walk project. There is no assessment that the proposed measures are the best solution to alleged camp site overuse and track erosion.

There was no assessment of disturbance using the 'limits of acceptable change' methodology to determine whether or not any of the proposed works will benefit the natural environment. Is the proposed track wearing out? Are the existing camp sites over used and being degraded? There is no data to determine the degree and rate of environmental change to merit any work.

The Colong Foundation doubts that the Light to Light Track is worn out as the track is in a remote location.

The alleged 'strategy' is a poorly thought out attempt to justify \$7.9 million in expenditure from the Regional Growth – Environment and Tourism Fund. The economic aims are speculative and the proposed strategy and draft plan amendments will dramatically alter existing visitor management and use of this national park, and there are no costings for the overall proposal, which also includes salaries for two camp wardens.

Some of the alleged benefits of the proposal, such as walking without a pack can be achieved already, with the assistance of Eden tour and bus operators delivering gear to camp sites by agreement in advance. Other facilities provide accommodation, such as Edrom resort beside the northern end of the park, as well as the adaptive reuse facilities at both lighthouses. These facilities provide adequate built accommodation, so provision of new built accommodation seems excessive just to cater to the high end of the visitor market.

The Colong Foundation believes that the proposed \$7.9 million worth of works will replace existing tour operators that provide more visitors with a better service, with new commercial operators who will favour the high end of the visitor market. The Colong Foundation believes that the proposed park visitation strategy must reduce visitor numbers. Closure of existing free camp sites to park visitors and the opening up of expensive paid camp sites will drive park visitation numbers down.

The Colong Foundation supports walkers using park management roads in coastal forests. Closed management roads provide enjoyable environments in which to saunter. The relocation of the walking track from the 4WD road between Leather Jacket Bay and Mowarry Point is opposed. This road should be closed to public vehicles and allowed to regenerate or at least be downgraded to a management road compatible with its use as a walking track.

## Comments on specific draft amendments to the Plan of Management

### Proposed amendment 1.1 to General description

2010 PoM Page 7 – Proposed amendment 3.3 major management strategies and programs of this plan is opposed

The requirement in the plan to maintain the natural, undeveloped feel of the Light to Light track should be retained as a direction, rather than downgraded to an aspirational guideline.

#### **Justification**

This proposed amendment enables management actions that can detract from remoteness of the natural environment and the experience thereof, so it is contrary to the vision of a Wilderness Coast.

Both the Strategy and draft plan amendments should examine measures to enhance and protect remoteness in the national park along the Light to Light walk. The proposed guideline will have no force and will allow the erosion of the Wilderness Coast vision.

### 2010 PoM Page 34-35 – Proposed walk amendment is opposed

Retain existing third paragraph on page 34 of current management plan regarding the Light to Light walk.

#### **Justification**

The proposed realignment of the walk will cause environmental damage to ecotone fringes of coastal plant communities. There is little evidence of track and campsite overuse that supports the proposed changes.

The range of visitors catered for will be diminished by these proposed changes as pack campers and through campers will be unable to effectively use the park for extended walks from Wonboyn and further south to Eden. This will result in a significant reduction in recreational opportunities for experienced walkers.

The proposed commercial, built accommodation – elevated camping platforms and wow-factor lookouts – are by definition incompatible with the remote natural setting of this park.

New fourth paragraph for page 34-35 of the plan regarding fees is opposed.

#### **Justification**

Charging for bookable camping facilities will not result in increased visitation as claimed, rather it will drive visitation levels downwards by increasing prices.

The proposed accommodation facilities are a money-making strategy that will reduce visitation. The alleged overuse is not justified by the evidence, and is a poor management tool to manage usage. The proposed model more or less privatises two camp sites in the national park that will no longer be able to be used by pack campers and through campers.

There is no justification for this alienation and reduction of cheap/free public camping opportunities.

The proposed realignment of the track will cause unacceptable environmental impacts as previously explained.

The Light to Light walk section fourth paragraph in the plan of management should be deleted.

#### **Justification**

The current fourth paragraph of the Light to Light walk section is inappropriate for a remote park. Fees are unnecessary at specific camp sites as there is no indication of these camp sites being overused. Degradation of camp sites is unlikely during the foreseeable life of the current plan of management given the remoteness of this park.

Page 42 – Management response – no need to replace existing management response as visitor use levels are acceptable and unlikely to increase given the remote nature of this park.

#### **Proposed amendments 1.2 for accommodation and associated facilities**

##### **Amendment 1.2 – specific meaning of Pack Campers is opposed**

#### **Justification**

The proposed definition of **Pack Campers** will effectively prevent pack camping in this park, and is opposed. Requiring pack campers to camp with car campers will be unsuitable for through campers seeking a remote experience.

##### **Accommodation - key values and management directions**

Page 7 proposed replacement of dot point 10 amendment is opposed.

Page 34 Section of Accommodation – retain current section heading, proposed new heading is opposed.

Amendment second paragraph of Accommodation, page 36 section 6.2 – adaptive reuse of existing buildings is not opposed.

Page 34 amendment last paragraph of Accommodation section, page 36 section 6.2 of plan is opposed.

Page 38-40 and 41-43 – The proposed management responses to construct new built accommodation and raised camping platforms are opposed.

Delete all references to new, built commercial camping facilities, permanent hard-roofed accommodation and associated kitchens from the draft plan amendments.

## **Justification**

Camping platforms are unnecessary in this park as the grassed campground sites are not overused, and remain fit for purpose as they add to the remoteness to the park and are in keeping with the Wilderness Coast vision.

These amendments are to facilitate bookable, money-making sites for commercial operators who will displace existing commercial operators who will be disadvantaged, particularly those who will no longer be allowed to service through walkers and pack campers.

NSW environment groups do not support built accommodation in national parks, except for appropriate adaptive reuse of historic, heritage-listed buildings. National parks occupy the low impact part of the recreational opportunity spectrum, with distinctive functions laid down in the *National Parks and Wildlife Act, 1974*. All national parks should be managed as unmodified natural areas, with specific prescriptions in plans of management allowing for appropriate vehicle access on defined routes, and small, compact, low-impact camping areas.

Visitors who use the proposed accommodation facilities and new realigned tracks will be inclined to view national parks as commodities. The purchasers of these expensive products will expect value for money and services to be provided from them. This is an entirely different relationship to the existing nature-focused one that pack campers and the general community have with this national park. Parks are meant to be predominantly for nature and natural processes.

The commercial money making relationship has led to a proposed denial of existing camp sites at Mowarry Point and Hegartys Bay to through campers, as well as those park visitors who can't afford to or do not wish to pay high camping fees. This exclusive relationship will cause resentment and rebellion of traditional park visitors. Also as accommodation price increases and access to camp sites is denied visitor numbers must decrease.

## **Proposed amendment 1.3 for camping**

Pages 34, 35, 40, 42 and 49 Section 6.2 proposals to limit camping to Saltwater Creek and Bittangabee Bay are opposed.

## **Justification**

Denial of pack camping use at Mowarry Point and Hegartys Bay is unnecessary. This proposal prevents competent self-reliant through walkers from enjoying the remoteness of the park.

This proposed provision also prevents school age groups, such as Duke of Edinburgh award groups and scouts, from attempting through walks. The prohibition on pack camping is excessive and this provision should be removed from both the southern and northern sections of the national park.

Pack camping sites at Shipwreck Creek in Croajingolong National Park are associated with car-based camping and have been constructed the easiest way possible by repurposing a

section of the carpark into a camp site. These camp sites are unsuitable as the ground is compacted by years of vehicle movements and is too hard to push pegs into, yet camping is restricted to this site.

Through campers don't wish to camp next to cars. Camping alongside car campers is unpleasant and not a remote experience for through campers and will be avoided. Park use by pack campers will decline towards zero.

A 'limits of acceptable change' methodology has not been applied to determine whether camping has impacted on the remoteness/naturalness of the park. If it was, it would identify measures to improve remoteness and naturalness.

The proposed built camping structures will adversely impact on the remoteness/naturalness of the park and are against the naturalness objective for the park. The proposals are not for low- impact walker camping areas, but force existing users in with car campers where they do not wish to camp.

### Proposed Amendment 1.4 for the walking track

Page 35, section 6.2 proposed diversions of walking track away from the existing Light to Light Walk, including the 4WD road from Leatherjacket Bay and Mowarry carpark are opposed.

#### **Justification**

An enjoyable forest walk can be created by redefinition of the Leatherjacket Bay and Mowarry Point park road as a management road.

Following the coast for the entire Light to Light walk is more boring than the current route through a diversity of coastal environments, including heaths and moors. The current route follows more closely the paths of Aboriginal traditional owners. Access to attractions on the coast should be provided along descending spurs to scenic places, such as Pulpit, blowhole and sea caves, and not located on the ecotone between taller shrubs and coastal heaths to cause potentially significant environmental impacts.

The proposed route is more about increasing wow-factors, than providing an appropriate nature-focused walk through a relatively remote coastal park. The proposal is contrary to the Wilderness Coast vision and is only about what is perceived as more attractive to higher paying patrons of the walk. This is a misconceived, narrow visitor-focused track design that hopes to make a future, new, commercial operator some money.

Through walkers would not often use a specific walk from Wonboyn to Green Cape – most of them will choose a route from Wonboyn to Bittabgabee Bay instead.

### Proposed amendment 1.5 for commercial opportunities

Page 30, section 6.1 proposed amendment to the desired outcomes for promotion, interpretation and desired outcomes for encouragement of accommodation facilities are opposed. These proposals are contrary to the NSW environment movement's opposition to new built accommodation in national parks.

The proposed amendments for accommodation in the list of recreation and tourism opportunities on the page 42-43, section 6.2 are also opposed.

The last dot point on page 15 of the proposed amendments for the proposed management response regarding walkers' huts, other accommodation and facilities proposed for Mowarray Point and Hegartys Bay are opposed.

The second last point on page 15 of the proposed amendments for the proposed management response regarding other buildings is opposed as an adaptive reuse, if the building is not heritage listed. Old buildings without heritage value should be demolished instead.

### **Justification**

The proposed tourist facilities should be provided in nearby rural districts beside Edrom Road, and at Eden or Wonboyn.

Nature Conservation Council of NSW **resolution 2014/H2** regarding iconic long distance walking tracks and wilderness areas states that:

*the Nature Conservation Council of NSW call on the NSW Minister for the Environment to ensure that the establishment of major extended walking routes through natural areas are subject to the following criteria:*

*... e) The provision of accommodation infrastructure to support such tracks should be provided off-park in nearby or adjoining areas so as to protect the park's natural values and benefit surrounding communities;*

Nature Conservation Council **resolution 2009/C3** to keep our National Parks safe from commercial exploitation states that:

*the Nature Conservation Council of NSW*

*1. oppose the NSW Government's plans to expand commercial tourism development in National Parks, in particular construction of new accommodation facilities within National Parks, and its plans to amend the National Parks and Wildlife Act and the Wilderness Act to facilitate such developments;*

*2. support improved, low-key facilities for National Park visitors, and better promotion to encourage more public use, off-park accommodation and other services which will support local economies, while avoiding more negative impacts on National Parks;*

*3. call on the Premier Nathan Rees and the Leader of the Opposition, Barry O'Farrell to continue the tradition of low-key, low impact visitor management and use for an adequately funded NSW national parks estate.*

### **Proposed amendment 1.6 for management access**

Page 32, section 6.2 regarding proposed access changes for recreation and tourism opportunities, including the 4WD road from Leatherjacket Bay and Mowarray carpark, are opposed.

Page 47, the proposed change to management response regarding park roads and management roads is opposed – the current arrangements should be retained.

Page 46, the proposed change to management operations regarding commercial use of helipads is opposed.

### **Justification**

The Colong Foundation supports the current closure of the road to Leather Jacket Bay to public access and the retention of its use for management and walkers. Public access to Mowarry Point should be on foot and the 4WD road closed. Vehicle use of the road by the proposed commercial operator is opposed as it interferes with walker access. The walk through the forest adds diversity to the experience of the Light to Light walk. Walking on a management trail enables a period of relaxed walking. Uniformity of track styles can be tedious.

The Colong Foundation does not support commercial operators' vehicle use of management trails. There should be one rule for all users and exclusive access arrangements to benefit commercial use that drives out other users is opposed.

The Colong Foundation strongly opposes commercial use of helicopter landing pads in the park. Helicopter tourism in national parks is controversial and such an activity alienates other park users. It destroys naturalness and the Wilderness Coast as a brand and experience.

### **Proposed amendment 1.7 Heathlands**

Page 11, proposed amendment of section 4.2, native vegetation regarding heathlands of the park is opposed.

Page 39, page 41 and pages 48-52 proposed amendments of section 6.2, desired outcomes for recreation and tourism opportunities regarding rerouting of the Light to Light track and environmental offsets are opposed.

### **Justification**

The Colong Foundation supports environmental protection, but the proposed rerouting away from traditional Aboriginal walking tracks that form part of the Light to Light walk through the heathland is opposed.

The environmental offsets for proposed visitor management in a national park are **red flags**.

The track should not be rerouted into giant honey-myrtle heath or the ecotone for the vegetation community. Proposed visitor management in a remote national park should not lead to poor environmental outcomes that require environmental offsets.

The walk through heathlands should be retained as no evidence has been provided of environmental degradation of these walking tracks. These tracks have been stable for

millennia, and basic management, such as water diversion, would ensure on-going use on most track sections without environmental degradation.

The proposals for raised platforms are only appropriate on swampy sections of the track and would be overkill elsewhere, that will detract from the remoteness experience of the walk.

The proposals to relocate the walking track to plant community ecotones along the coastline appears to be motivated by inappropriate marketing of the Light to Light track as an iconic coastal track, rather than environmental concerns. The bias against conservation practice is illustrated by the plan to clear bushland in the national park for the proposed relocation of the Light to Light track. The requirement to protect the environment according to the National Parks and Wildlife Act's Management Principles has been overlooked.

Relocating the track along the coastline will:

- cause unnecessary environmental impacts to the park's delicate ecology through plant dieback and track clearing;
- create a more boring walk with less experience of a variety of landscapes and ecosystems;
- degrade the naturalness and remoteness of the experience, contrary to the vision for the park; and
- be at odds with the Wilderness Coast brand.

### Proposed amendment 2 cultural camp

Removal of the proposed walking track is opposed. Existing page 40, section 6.2 in the proposed amendment to recreation and tourism opportunities' desired outcomes, should allow the walking track in both the northern and southern sections of the park. Walking should also be allowed in both directions, as this remote park is not heavily used.

#### **Justification**

The Colong Foundation opposes the current plan that prevents pack camping and through walking in the northern part of the park.

The recommended management plan amendment re: the proposed walking track appears to misunderstand Traditional Owner wishes regarding the track.

The traditional owners are understood to want to retain traditional walking tracks through both the northern and southern parts of the park. The closure and relocation of traditional walking tracks is an inappropriate management action.

### Amendment 3.1 public vehicle access

Page 32, 39, 41 and pages 48-52 regarding public vehicle access are not an adequate response to the inappropriate number of vehicle access roads in the park.

## **Justification**

Restricting vehicle access encourages appropriate use of the park. The National Parks and Wildlife Service should encourage visitors to walk, by withdrawal of vehicle access some distance from the points of interest in the park. Access to coastal points of interest should be by short walking tracks along descending spurs to sites such as, Walkers Rock, Bobs Rock, Spot X and City Rock.

Overuse of tracks is more likely to be related to excessive vehicle access rather than overuse of a through walking track in a remote park.

Thank you for the opportunity to comment on these draft plan amendments to the 2010 Ben Boyd National Park and Bell Bird Nature Reserve Plan of Management and the accompanying Light to Light Walk strategy.

Yours sincerely,



Keith Muir  
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The Colong foundation for Wilderness Ltd