

Mount York Reserve – Draft Plan of Management

ANALYSIS OF PUBLIC SUBMISSIONS

The Draft Plan of Management for Mount York Reserve was exhibited for public comment and review under the provisions of both *the Local Government Act* and the *Crown Lands Act*. Blue Mountains City Council had primary carriage of the Draft Plan's exhibition.

Blue Mountains City Council placed the Draft Plan on exhibition from 25 February to 4 April 2008.

Copies of the Draft Plan were available for inspection at:

- Council Libraries;
- Katoomba and Springwood Council offices (business hours);
- Council's website; and
- The Imperial Hotel, Mt Victoria.

The Draft Plan's exhibition, and public meeting, was advertised in *The Blue Mountains Gazette*. Posters advising of the Draft Plan's exhibition, availability and public meeting were placed on-site at the reserve, as well as other sites in Mt Victoria and the Blue Mountains. Known stakeholders, including those who had contributed to the Draft Plan's preparation, were also directly notified - by letter, e-mail or telephone - of the Draft Plan's exhibition for comment and review. Face-to-face, telephone and e-mail conversations were held with several stakeholders during the exhibition period to seek input on the Draft plan and/or elaborate submissions.

A public meeting regarding the Draft Plan was held on Wednesday 19th March 2008, at Mount Victoria Public School. This meeting was attended by 14 people, and lasted approximately 2 hours 20 minutes.

The Draft Plan's public exhibition under the *Crown Lands Act* was notified in the *Government Gazette* on 14 March 2008. The Department of Lands exhibited the Draft Plan for 28 days from 14 March to 11 April 2008.

Written comments on the Draft Plan, under both exhibition processes, were received by Blue Mountains City Council by post, hand delivery, facsimile and e-mail.

A total of 15 submissions were received – 7 were lodged by the due date of 4 April 2008, and a further 8 submissions were also accepted after this time by prior arrangement with Blue Mountains City Council.

Submission were received from:

- 6 individuals – 3 Mt Victoria residents, 1 elsewhere in the Blue Mountains/Lithgow, 1 Sydney metropolitan, and 1 not-stated;
- 4 user groups (recreation and commercial recreation/education) – 3 Blue Mountains/Lithgow, and 1 Sydney metropolitan;
- 2 interest groups – 1 Blue Mountains (history) and 1 Sydney metropolitan (conservation); and
- 3 agencies – all Blue Mountains/Lithgow (Lithgow City Council lodged 2 separate submissions).

Analysis Table

The following table provides an analysis of the issues raised in all 15 submissions received in relation to the Draft Plan of Management for Mount York Reserve.

For each submission the location (origin) and type of respondent, submission date, and type of submission are given. The major issues raised in the submissions, as well as a discussion or response to the issue raised and any suggested amendments to the Draft Plan, make up the heart of the table.

For ease of cross-referencing and use, the analysis of submissions has been structured using the same headings and sections as the Draft Plan

Sub No.	Origin of Respondent	Type of Respondent	Date	Type of Submission	Issue Raised	Response and Suggested Action/Amendment
General/Overall Comments						
3	Local resident (Mt Victoria)	Local, regular users	26 March	Feedback Form	Support for vision and overall management direction present in PoM – “something that stands out [in the PoM] is a genuine desire to protect the Mount York Reserve which is refreshing and encouraging”.	No action/amendment required.
5	Not given (e-mail submission)	Recreation User	2 April	E-mail	“Overall I agree with the sentiments expressed in the draft PoM and I feel that it will provide a sound base for future management of the area.”	No action/amendment required.
6	Local resident (Mt Victoria)	Local, regular users	4 April	Feedback Form	Vision and overall direction for the reserve presented in the Plan is “appropriate and worthwhile.”	No action/amendment required.
Research Methods and Community Consultation (1.6)						
11	Blue Mountains/ Lithgow	Agency (Lithgow City Council)	14 April	Letter	Remove comments about Lithgow City Council not making resident details available for notification of the first community meeting (Page 5), and note that Council subsequently notified effected landholders of the	Amend PoM to remove reference to Lithgow City Council not making resident details available and to acknowledge that that Lithgow City Council subsequently notified affected landholders within the LGA of the Draft PoM’s public exhibition.

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					Draft PoM's public exhibition.	
Fauna (2.3.5)						
4	Blue Mountains/ Lithgow	Nature conservation and commercial tour operator	31 March	Letter	Mt York is an increasingly popular birdwatching destination, with a suite of uncommon species that can be readily seen within the reserve.	Amend PoM to make specific reference to birdwatching appeal.
4	Blue Mountains/ Lithgow	Nature conservation and commercial tour operator	31 March	Letter	Bird populations change seasonally so "a consultant who visits the site a limited number of times would not be able to determine the full extent of the site's avifauna".	Amend PoM to acknowledge that bird data may be incomplete t due to seasonal characteristics of the area's avifauna.
4	Blue Mountains/ Lithgow	Nature conservation and commercial tour operator	31 March	Letter	In the Upper Mountains the Glossy Black-Cockatoo more often feeds on <i>Acacia littoralis</i> and <i>A. distyla</i> , rather than <i>A. torulosa</i> as stated in the PoM (Page 54). Assessment of Glossy Black-Cockatoo habitat should 'primarily consider these two plant species in combination with the presence of large tree hollows required for breeding".	Amend PoM to acknowledge possible differing feed tree preferences/behaviours among of Glossy Black-Cockatoos in the Upper Mountains.
Protection of Aboriginal Values (4.1)						
6	Local	Local,	4 April	Feed-	More specific provision	No sites of Aboriginal heritage significance are

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	resident (Mt Victoria)	regular users		back Form	required for the “protection of any future Aboriginal heritage items that come to light”.	at present known from the reserve. However the PoM makes provision for the protection of any sites/values that may be identified in the3 future – referring to the requirements National Parks and Wildlife Act 1974, the Heritage Act 1977 and confidentiality provisions of the Local Government Act 1993 as well as the co-operative management/protection of any sites in liaison with relevant Aboriginal people/organisations. (Page 97) Add Action relating to appropriate management/protection of any Aboriginal heritage sites/values found on the reserve in future in accordance with legislative requirements and in collaboration with relevant Aboriginal people/organisations.
Protection of Aboriginal Values (4.1) and Protection of Non-Aboriginal values (4.2)						
6	Local resident (Mt Victoria)	Local, regular users	4 April	Feed-back Form	Heritage values, Aboriginal and non-Aboriginal, should be given more emphasis in the Plan.	The PoM already dedicates significant space and detail to describing the reserve’s heritage values and setting out policies/actions for their management. (Pages 12 to 45, 96 to 102 and Actions 1.1 and 2.1 to 2,3 as well as elsewhere). The reserve’s historic heritage values, especially the historic roads, are also addressed in several supporting documents – notably the <i>Conservation Management Strategy for Cox’s Road (Mount York Precinct), Lawson’s Long Alley, Lockyer’s Line of Road and Berghofer’s Pass</i> as prepared in

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						2007 by BMCC and High Ground Consulting. Amend PoM to refer readers seeking more historic heritage detail/background to the 2007 Conservation Management Strategy.
10	Blue Mountains/ Lithgow	Heritage Group	10 April	Letter	An “Aboriginal and European heritage archaeological survey should have the highest of priorities” and be carried out “prior to redevelopment of any kind”.	The PoM provides for a detailed condition survey and assessment of the four historic roads, and application of the precautionary principle in the management of all heritage sites/values within the reserve. Amend PoM to include a provision for archaeological investigations to be undertaken on an “as required” basis in relation to major redevelopment or development proposals.
Protection of Non-Aboriginal Values (4.2)						
3	Local resident (Mt Victoria)	Local, regular users	26 March	Feed-back Form	“Historic elements of initial European exploration should be maintained and preserved.”	The PoM dedicates significant space and detail to describing the reserve’s heritage values and setting out policies/actions for their management as a priority. (Pages 12 to 45, 96 to 102 and Actions 1.1 and 2.1 to 2,3 as well as elsewhere). No action/amendment required.
10	Blue Mountains/ Lithgow	Heritage Group	10 April	Letter	Cox’s Road is of such heritage significance “to development of the infant colony of New south Wales” that “no recreational activity should be permitted to damage its fabric” and that “Council should immediately	The PoM identifies that protection of the cultural heritage values of the historic roads will be a primary consideration in their management” (page 101), and includes a large number of provisions aimed at protection of the heritage fabric and values of Cox’s Road and other historic roads within the reserve. The PoM also includes numerous

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					<u>restrict</u> and where appropriate <u>prevent</u> those activities that have a degrading effect on the heritage and environmental values of the site".	measures to minimise and manage the impacts of current and future recreational use of these historic routes. No action/amendment required.
10	Blue Mountains/ Lithgow	Heritage Group	10 April	Letter	The Blaxland, Lawson and Wentworth Memorial is a "travesty of a commemoration and should be removed ... it only degrades the very considerable achievement of these explorers".	The Blaxland, Lawson and Wentworth Memorial has been assessed as being of heritage significance (page 44-5), and the PoM recognises the need for a Conservation Management Plan (CMP) to be prepared to guide the future management of all monuments in the Mount York Day Use Area (although the preparation of this CMP is not reflected in the PoM's proposed Policies or Action Plan). The POM also proposes that the feasibility of replacing the explorer's busts on the Blaxland, Lawson and Wentworth Memorial be investigated subject to the findings of the CMP (Action 2.3 F). Amend PoM to include specific reference to preparation of a Conservation Management Plan for the monuments in the Mount York Day Use Area - including options for the retention, restoration, relocation or other management treatment of all existing monuments.
13	Sydney Metro	Conservation Group	1 May	Letter	The complex of historic roads at Mount York are "probably of national importance, and possibly international	All four historic roads are already listed on the register of the National Estate. No action/amendment required.

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					importance, as an excellent example of the results of a colonial economy dependent upon convict labour” and Council should nominate the reserve (Mount York area) for inclusion on the National Heritage List.	
13	Sydney Metro	Conservation Group	1 May	Letter	The PoM does not adequately separate users in the top section of Cox’s Road, with additional expenditure proposed to accommodate multiple use in this area to the detriment of its role as a heritage precinct. Additional developments in favour of rope sports are especially problematic.	The upper section of Cox’s Road, from the day use area to “The Block” is already the most frequently used part of the reserve with a variety of attractions for day visitors, heritage enthusiasts, rope-sport participants, commercial groups and mountain bikers. The PoM endeavours to balance the interests of these existing users while protecting the site’s underlying heritage values and attractions. However the proposed rope-sports training area off the south-east side of the upper section of Cox’s Road (Action 4.1 H) has the potential to add to the congestion of this historic precinct, and has only limited support among the climbing community. Amend PoM to remove the proposed training area from the upper section of Cox’s Road and suggest the investigation of alternative sites for a training area if there is demand for such a facility (rope-sports training is not to be permitted in the Mount York Day Use Area).

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Protection of Non-Aboriginal Values (4.2) and Cliff Recreation (4.4.4)						
2	Sydney Metro	Recreation user group (rock climbing)	25 March	Letter	Climbing activity does not directly impact on the historical values of Cox's Road itself any more than bushwalking or tourism traffic.	The PoM includes measures to manage the impacts of all current, and possible future, recreational uses on the heritage values of Cox's Road. No action/amendment required.
10	Blue Mountains/ Lithgow	Heritage Group	10 April	Letter	Cliff recreation adjacent to the northern end of Cox's Road needs to be "more carefully controlled and monitored", this area needs "specific protection" as "considerable damage has already been caused to the heritage fabric".	The PoM includes several provisions to manage cliff recreation in the vicinity of the upper section of Cox's Road – including prohibiting "bouldering" and abseiling at The Block, redirecting commercial rope-sports groups away from the Galactic Gully to Echo Gully area, and improvements to the track to upgrade its resilience and offer additional protection to the historic fabric (Pages 101-2 and 112-3). No action/amendment required.
Recreation Setting (4.4.1)						
7	Local resident (Mt Victoria)	Neighbour	Un-dated	Feedback Form	"Safety for the locals and visitors is of the utmost importance" and road safety issues along Mount York Road – such as large tourist buses, road width and speed limits – need to be addressed. Mount York road should be regularly signposted as a 50kph speed limit.	The PoM includes provision for speed humps at the entry to the Mount York Day Use Area (Figure 16) to slow traffic entering this high use and pedestrian area. Additional speed/warning signage could be provided at the reserve entry and in the Barden's Lookout area. However most of the Mount York Road is outside the reserve, and beyond the ambit of this PoM. Amend PoM to provide for road safety signage at the reserve entry and other locations as required.

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Visual and Residential Amenity (4.3) and Recreation Setting (4.4.1)						
3	Local resident (Mt Victoria)	Local, regular users	26 March	Feedback Form	“All and any work or maintenance be focused upon retaining the reserve’s natural unbuilt-up condition”	PoM already provides for maintaining the vast majority of the reserve in its natural state (variously categorising it as Natural Area – Bushland, Escarpment or Watercourse) as well as providing for the maintenance of natural vegetation along skylines, the sympathetic development of visitor facilities, and appropriate management of recreation activities to reduce impacts on the area’s heritage values, pest and weed control, and fire management provisions. (Figures 14 and 125 Land Categorisation Plans and throughout). No action/amendment required.
Key Visitor Nodes (4.4.2)						
3	Local resident (Mt Victoria)	Local, regular users	26 March	Feedback Form	Parking for cars and coaches should be as unobtrusive as possible, with parking for coaches “further away from the monument area, such that they clog it neither physically or visually.”	The PoM provides for landscaping treatments to break-up and reduce the visual impacts of the existing extended car parking areas around the perimeter of the Mt York Day Use Area (Figure 16 Masterplan). The PoM also proposes formalising the existing informal bus parking layby along the western side of the loop road at this site – in front of Mt Blaxland Lookout - (Action 4.1 I) until alternative bus parking can be provided in the longer term on the site of the current informal camping area south-west of the Mt York loop road (Page 116 and Figure 20). Bus parking is also proposed,

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						as a layby, adjacent to the remodelled Barden's Lookout in the longer Term (Figure 21 and Action 4.2 D). Amend Mt York Day Use Area Masterplan to locate bus parking in a less intrusive location in the short term, if possible (potentially along the northern side of the loop road east of Explorers' Arch, or adjacent to the existing large concrete picnic shelter).
6	Local resident (Mt Victoria)	Local, regular users	4 April	Feedback Form	Functioning water tanks are required at "Mt York itself ... another at camping site at lower (north) end of Lockyer's".	Water tanks are now in place at the Mt York Day Use Area and the Lockyer's Line of Road Trackhead (Day Use Area) at Hartley – however neither are functional or in use. The Mt York area is not connected to mains water supply. The PoM does not propose connecting water to the site, or otherwise providing potable water supplies at any location within the reserve, as this is considered neither desirable or cost-effective. No action/amendment required.
6	Local resident (Mt Victoria)	Local, regular users	4 April	Feedback Form	"Ideal" style of "bush toilets" for use at Mt York would be similar to those that were previously developed at Evans Lookout (but destroyed by the most recent major bushfires).	The PoM makes provision for the redevelopment/development of low-key toilet facilities in the Mt York Day Use Area (proposing a hybrid waterless unisex disabled access toilet) and in the proposed basic standard camping area (Page 116, Figure 16 Masterplan and Action 4.1 F). However it is not considered appropriate/necessary to be too prescriptive about detailed design issues or cite examples of comparable facilities.

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						No action/amendment required.
Walking Track Network (4.4.3)						
2	Sydney Metro	Recreation user group (rock climbing)	25 March	Letter	Safety issues posed by walkers above and below the cliff face and walkers being misled into climbing areas will be addressed by the safety warning signage proposed in the PoM.	No action/amendment required.
3	Local resident (Mt Victoria)	Local, regular users	26 March	Feedback Form	Create a narrow roadside walking or cycling track beside Mt York Road.	The PoM includes provision for formalisation of the loop walking track along the base of the escarpment from Cox's Road to Barden's Lookout and returning via the existing sections of Cox's Road and other in-situ tracks across the ridge top to the Mt York Day Use Area (Page 110, Figure 13 and Action 4.7 C & D). This will involve some upgrading of the existing roadside tracks within the reserve. However most of the Mt York Road is outside the reserve, and beyond the ambit of this PoM. No action/amendment required.
6	Local resident (Mt Victoria)	Local, regular users	4 April	Feedback Form	"More could be done to control visitors' dogs" (such as more signs, heavy fines and a greater Ranger presence).	Dogs are not prohibited from the reserve, and the area's tracks – notably Berghofer's Pass – are regularly used for dog walking/exercising as is now acknowledged in the PoM (Pages 37 and 110). Add Policy relating to increasing visitor awareness of appropriate dog control/behaviour within the reserve and

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						potential impacts of dogs on the experiences of other visitors and the reserve's fauna and other values.
7	Local resident (Mt Victoria)	Neighbour	Un-dated	Feed-back Form	A footpath is needed along Mount York Road for safety reasons.	The PoM includes provision for formalisation of the loop walking track along the base of the escarpment from Cox's Road to Barden's Lookout and returning via the existing sections of Cox's Road and other in-situ tracks across the ridge top to the Mt York Day Use Area (Page 110, Figure 13 and Action 4.7 C & D). This will involve some upgrading of the existing roadside tracks within the reserve. However most of the Mt York Road is outside the reserve, and beyond the ambit of this PoM. No action/amendment required.
9	Sydney Metro	Recreation User	8 April	E-mail	Any new trails created should be shared access "that can sustain both wheels and feet".	The PoM provides for the development of only one new trail (apart from minor connecting trails and linkages associated with proposed modifications of the day use and relocated camping areas) (Page 110 and Action 4.7 C & D). This is the proposed walking track along the base of the escarpment from Cox's Road to Barden's Lookout, located downslope from the base of the escarpment and mostly following an existing rough track or footpad. It is intended to provide the shorter walking experience now lacking within the reserve. The access limitations and steep climbs at each end of this route, the aggressive side-slope and rocky terrain in many places, and

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						the penitential for conflict with rope-sport users all preclude the shared use of this proposed route by mountain bikers. No action/amendment required.
10	Blue Mountains/ Lithgow	Heritage Group	10 April	Letter	Use of the reserve's tracks by walkers "should not be underestimated". Blue Mountains Branch of the National Trust conducts a well-attended (30-50 people) heritage walk along Cox's Road annually, and "other bushwalking groups also walk the track".	The PoM already describes the use of each historic road by walker, and other recreational users, acknowledging that recreational use of these routes is an important part of the reserve's appeal. Amend the PoM to make specific reference to the National Trust's guided heritage walk on Cox's Road (section 2.4.7 and/or 2.4.8 and /or 2.4.10).
Walking Track Network (4.4.3) and Cliff Recreation (4.4.4)						
2	Sydney Metro	Recreation user group (rock climbing)	25 March	Letter	The PoM provides for priority to be given to walkers when there is a clash of track-based recreation activities. But this should not include any new tracks developed in established rock climbing area, notably the proposed loop walk along the base of the cliffline from Cox's Road to Barden's Lookout	The PoM already provides for the proposed loop track to be developed, in the Medium Term, from Cox's Road to Barden's Lookout to be "located downslope from the cliff base" to "reduce conflicts between walkers and climbers" (Page 108). The proposed track is to be located downslope of the cliff base, and so would not be used by climbers. Climbers will access climbing sites by the base of cliff as they currently do. No action/amendment required.
15	Blue Mountains/ Lithgow	Commercial/ educational recreation	13 May	Letter	The proposed loop track to be developed from Cox's Road to Barden's Lookout "would	The PoM provides for the proposed loop track to be developed, in the Medium Term, from Cox's Road to Barden's Lookout to be "located

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		user group (rock climbing)			pose safety issues for walkers with regards to potential rock fall from cliff users” and risks to “curious walkers wanting a closer look at cliff activities”.	downslope from the cliff base” to “reduce conflicts between walkers and climbers” (Page 108) and the PoM also makes provision for site-based risk assessments and signage provisions (Page 105). Amend PoM to specify that signage will be installed along the along the cliff bottom sections of the proposed loop walking track to exclude non-climbers/abseilers from the cliff base.
Walking Track Network (4.4.3) and Mountain Bike and Horseriding (4.4.5)						
1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	Historic roads that are open to walkers, mountain bikers and horseriding should not be called walking tracks but preferably, and more accurately, be labelled “shared trail” or “multi-use trail”. Historic roads were not, initially, built for walkers only. This more correct labelling will more accurately reflect the shared use of these routes and alert users to the shared nature of these routes helping to manage user expectations. It will also help differentiate those tracks where riders are not permitted.	Labelling those historic roads and other routes that are open to use by both walkers and riders (mountain bike and horse) as “shared historic route”, “shared track”, “multi-use trail” or similar will give a more accurate description of both a route’s values (in the case of historic roads) and the intended shared recreation experience/use. It will assist in managing users’ expectations and, potentially, their behaviours. (Action 4.9 B) Amend PoM to label those routes identified as appropriate for shared recreational use as a “shared historic route“ in the case of historic roads (when referring to the recreational use of these roads) and “shared track” for other shared routes.

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1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	The PoM acknowledges the historic roads as popular bushwalking destinations, but does not equally recognise their appeal as mountain biking routes. The routes are well known and promoted among the mountain biking community. The PoM describes Lockyer's Line of Road as being used "occasionally by mountain bikers" (Page 34, and again on 69) when it is actually one of the most popular and frequently used mountain biking routes in the reserve (especially as a descent).	Further web research supports the profile, awareness and popularity of the reserve's tracks amongst the mountain biking community. Amend descriptive/information sections of PoM to more accurately reflect the popularity and use of the reserve's trails as mountain biking destinations.
1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	Narrow sections of the historic roads – such as much of Lockyer's Line of Road – are described in the PoM as "typical bushwalking tracks" (Page 34 and elsewhere) which does not reflect their use/value as mountain biking routes as well.	Narrow track sections could be more accurately described as "single track", "narrow track", "bush track" or similar to present a description less oriented to any particular recreation usage. Not Single track as this is very much a mountain/ cross country bike terminology. Amend descriptive/information sections of PoM, where appropriate, to more accurately describe narrow sections of historic routes as "bush track".
1	Blue Mountains/ Lithgow	Recreation user group	25 March	Letter	Totally opposed to blanket provision that walking is to be	To be effective the PoM must address potential future management scenarios, and

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	Lithgow	(mountain bikes)			given priority where recreation uses of tracks//trails clash. Historic routes “were never constructed as walking tracks and should not be seen solely as such”. Resolution of usage conflicts should be addressed by a “formal procedure” to “address the issues leading to the conflict” and that “treats all users equally”. If a trail is closed to mountain bikers and allocated solely to walkers, then “another should be declared a dedicated cycle trail”.	define policies/priorities to assist managers in responding to these. It is therefore necessary to identify a prioritisation/ranking for those recreation activities to accommodate within the reserve (or parts thereof). PoM provides for both bushwalking and mountain biking, with priority to walkers if/when/where necessary. Only minor track closures are proposed for visitor safety and heritage protection reasons, as well as continued monitoring of mountain bike impacts across the track network and adaptive management as/when/where required. (Pages 104, 108, 110-1 and 114 and Action 4.9 A & B). However user consultation is an important part of this decision-making process, and the PoM also provides for consultation with mountain bike user groups in track management, particularly in regard to potentially excluding mountain biking from some areas (Page 114). Amend PoM to provide for measures to attempt to accommodate competing track users as a first response to usage conflicts, rather than immediate closure/exclusion of some activities.
1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	PoM refers to use of <i>Draft Blue Mountains Walking Track Strategy</i> and the <i>Draft Walking Track and Lookout Assets Management Plan</i> in managing the reserve’s track	The plan refers to these documents as they are site specific studies of the areas. The PoM could usefully also reference mountain bike trail manuals/guidelines, however there are no proposals to construct new bike trails in the reserve .

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					network (Page 110-1). Should also refer to appropriate mountain bike track manuals/guidelines, notably the International Mountain Bike Association's <i>Trail Solutions – Building Sweet Single Track</i> .	Amend PoM to include reference to International Mountain Bike Association's <i>Trail Solutions – Building Sweet Single Track</i>.
1	Blue Mountains/Lithgow	Recreation user group (mountain bikes)	25 March	Letter	PoM recommends that walkers have right of way on all shared routes with mountain bikers to "give way" (Page 108). This may not be the most practical solution, especially where walkers could easily step off a trail and for riders travelling uphill (where momentum is important for riders),	Mountain bikes moving off track to give way to walkers may exacerbate impacts to the trackside environment. Current practice among mountain bikers is that uphill riders have right of way on "single track". According to representatives of mountain biking users Berghofer's Pass is a popular uphill route and Lockyer's Line of Road a preferred mountain biking track for travel in both directions, Lawson's Long Alley is the "least interesting" of all routes and Cox's Road is used by a smaller subset of more experienced/capable riders, Amend PoM to identify that mountain bikers travelling uphill have right of way on Lockyer's Line of Road and Berghofer's Pass, and walkers to have right of way on all other shared routes with mountain bikers to "give way". Amend PoM to clarify that horseriders "give way" to all other users of shared routes.
9	Sydney	Recreation	8 April	E-mail	Measures to encourage	PoM provides for both bushwalking and

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	Metro	User			bushwalking and mountain biking “welcomed and supported”.	mountain biking. (Pages 104, 108, 110-1 and 114 and Action 4.9 A & B) No action/amendment required.
9	Sydney Metro	Recreation User	8 April	E-mail	Both mountain bikers and bushwalkers should be given equal access to the track network and “the trails shared fairly”.	PoM provides for both bushwalking and mountain biking, with priority to walkers if/when/where necessary. Only minor track closures proposed for visitor safety and heritage protection reasons, as well as continued monitoring of mountain bike impacts across the track network and adaptive management as/when/where required. (Pages 104, 108, 110-1 and 114 and Action 4.9 A-C) No action/amendment required.
9	Sydney Metro	Recreation User	8 April	E-mail	Tracks that are open to both walkers and mountain bikers should, be called “shared trail” rather than ‘walking trail’ to more accurately reflect shared use and alert users to the shared nature of these routes.	Labelling those historic roads and other routes that are open to use by both walkers and riders (mountain bike and horse) as “shared historic route”, “shared track” or similar will give a more accurate description of both a route’s values (in the case of historic roads) and the intended shared recreation experience/use. It will assist in managing users’ expectations and, potentially, their behaviours. (Action 4.9 B) Amend PoM to label those routes identified as appropriate for shared recreational use as a “shared historic route“ in the case of historic roads (when referring to the recreational use of these roads) and “shared track” for other shared routes.

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Cliff Recreation (4.4.4)						
2	Sydney Metro	Recreation user group (rock climbing)	25 March	Letter	Rock climbers welcome the proposal for addressing the impacts of this activity in consultation with the climbing community.	The PoM provides for liaison with the climbing community in the on-going management of rope sports and their impacts at the reserve (Pages 112-3 and Actions 4.8). No action/amendment required.
2	Sydney Metro	Recreation user group (rock climbing)	25 March	Letter	Volunteer labour, involving the rock climbing community, could again be used to assist in the management of rope sports impacts.	The PoM provides for the revitalisation of Blue Mountains Cliffcare and other initiatives for climber involvement in the on-going management of rope sports and their impacts at the reserve (Pages 112-3 and Actions 4.8). No action/amendment required.
2	Sydney Metro	Recreation user group (rock climbing)	25 March	Letter	Based on information from the Smith and Smith flora and fauna assessment about the location of threatened flora species, climbing appears to be no more of a threat to fauna of the area than the other activities presently occurring within the reserve.	The PoM includes measures to manage the impacts of rope sports across all reserve values. No action/amendment required.
2	Sydney Metro	Recreation user group (rock climbing)	25 March	Letter	The hazards posed to climbers by loose rocks and tree falls “can not be considered Council’s responsibility and climbers understand they must accept these risks as a normal component of the activity”.	The PoM recognises that it is necessary for climbers and rope sports enthusiasts within the reserve “to accept full responsibility for their own safety” (Page 111). No action/amendment required.
2	Sydney Metro	Recreation user group	25 March	Letter	Consultation with the climbing community is strongly	The PoM provides for liaison with the climbing community in the management of existing and

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		(rock climbing)			recommend prior to the removal of bolts having an unacceptable impact or which are no longer required, so that “the key desired outcome will be understood and identified by all concerned”.	new bolts at the Sunny and Shady Side rope sports areas (Page 113 and action 4.8 F). No action/amendment required.
3	Local resident (Mt Victoria)	Local, regular users	26 March	Feedback Form	Preference for Option 2 proposed cliff-bottom treatment, due to lesser impacts and maintenance demands, and support for and proposed cliff top treatment.	Selection of final cliff-bottom treatment will be dependent on more detailed design, impacts assessment, stakeholder consultation and available budget during plan implementation. No action/amendment required.
5	Not given (e-mail submission)	Recreation User	2 April	E-mail	Although promotion of bolted/rebolted climbing routes in unmanaged areas can undesirably spread rope-sport usage, the rebolting of “neglected routes” could also be used to “spread” climbers “out along the cliff line thus reducing the concentration of climbers at the current heavily visited spots.”	The PoM provides for liaison with the climbing community to promote the exclusion of new bolts at Sunny and Shady Side and the replacement of existing bolts only (Page 113 and action 4.8 F). Amend PoM to also acknowledge that the selection, in collaboration with the climbing community, of those existing climbs in these areas to be rebolted will also be used as a tool for spreading/managing rope-sport impacts.
13	Sydney Metro	Conservation Group	1 May	Letter	Formalisation of rope-sports areas and the provision of improved or additional facilities, such as cliff top and cliff base facilities as well as the proposed training site, may attract more climbers to	Site hardening is required to manage the existing and anticipated impacts from rope-sport usage along cliff top and bottom areas, as well as for visitor safety and aesthetics. While improved facilities may attract more rope-sports enthusiasts, this may take the pressure off other sites (such as those inside

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					the area to the detriment of its heritage values and displaces other users.	national parks) while other users may be displaced from Mount York to other – less developed – venues. However the proposed rope-sports training area off the south-east side of the upper section of Cox’s Road (Action 4.1 H) has only limited support among the climbing community. Amend PoM to remove the proposed training area from the upper section of Cox’s Road and suggest the investigation of alternative sites for a training area if there is demand for such a facility (rope-sports training is not to be permitted in the Mount York Day Use Area).
13	Sydney Metro	Conservation Group	1 May	Letter	The proposed “climbing practice area” should be developed at another climbing site, preferably along the Mount York road or outside of the reserve (at a site chosen with climbers’ input), where it may draw usage away from Mount York. Development of this facility next to “The Block’ which is already adversely effected by practice climbing will add to the problems at this site.	The proposed rope-sports training area off the south-east side of the upper section of Cox’s Road (Action 4.1 H) has only limited support among the climbing community and may add to congestion in this area. Amend PoM to remove the proposed training area from the upper section of Cox’s Road and suggest the investigation of alternative sites for a training area if there is demand for such a facility (rope-sports training is not to be permitted in the Mount York Day Use Area).
15	Blue Mountains/ Lithgow	Commercial/ educational recreation	13 May	Letter	Redirecting commercial operators and training groups away from Galactic to Echo	The PoM provides for the staged relocation, with usage reviews, of large commercial groups out of the Galactic to Echo Gully area

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		user group (rock climbing)			Gully, to The Gully and west of Echo Gully, will detrimentally effect their activities. The Gully and west of Echo Gully are too small and lack a progression of higher and technically more difficult abseils. No climbing is possible in The Gully, and west of Echo Gully has no range of climbs offering increasing heights and grades. Commercial climbing activity will be displaced to other less used sites which will in turn be impacted.	to other suitable sites – including an area west of Echo Gully which is already used by larger groups (Page 113). This is necessary to reduce both congestion and conflicts between large organised climbing/abseiling groups and other independent rope-sports groups as well as on other visitors to this area which is the reserve's most heavily used precinct (including Cox's Road historic cutting, a popular lookout over the Hartley Vale Valley and The Block. This is a central element of the PoM's management directions for the Mount York area. Implementing this new usage pattern/limits via Council's commercial licensing system could allow for "threshold" points or specific timing factors to be built in to the commercial use limitations on the use of the Galactic to Echo Gully area, The PoM provides for on-going liaison with commercial user groups in the management of rope-sports activities (Page 112), and this will allow for suitable alternative training locations – with the necessary features, degree of difficulty and progression – to be identified and access upgraded and impact mitigation measures developed. No action/amendment required.
15	Blue Mountains/Lithgow	Commercial/educational recreation user group	13 May	Letter	Hardening of the Mount York rope sports site and "restrictions limiting impact to vegetated areas and trees	Site hardening and impact management is a central element of the PoM's management directions for the Mount York rope-sports area. No action/amendment required.

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		(rock climbing)			bases will allow continuation of high level, sustainable usage”.	
15	Blue Mountains/Lithgow	Commercial/educational recreation user group (rock climbing)	13 May	Letter	The proposed training area beside the upper section of Cox’s Road “is of little use ... the area can accommodate one group only and the height of the wall (1m) is too small to effectively prepare a novice for the cliff”.	The proposed rope-sports training area off the south-east side of the upper section of Cox’s Road (Action 4.1 H) has only limited support among the climbing community and may add to congestion in this area. Amend PoM to remove the proposed training area from the upper section of Cox’s Road, or simply identify this open area as an “approved” training/gathering site but with no facilities, and suggest the investigation of alternative sites for a training area if there is demand for such a facility (rope-sports training is not to be permitted in the Mount York Day Use Area).
15	Blue Mountains/Lithgow	Commercial/educational recreation user group (rock climbing)	13 May	Letter	Preference for Option 2 Stone Retaining Wall as the proposed cliff-bottom treatment, due to it being “less invasive and in keeping with the natural feel of the area”.	Selection of final cliff-bottom treatment will be dependent on more detailed design, impacts assessment, stakeholder consultation and available budget during plan implementation. No action/amendment required.
Mountain Bike and Horseriding (4.4.5)						
1	Blue Mountains/Lithgow	Recreation user group (mountain bikes)	25 March	Letter	Page 63 of the POM incorrectly refers to mountain bikers visiting Mount York as “part of longer routes through the area”, while the reserve’s	This section of the PoM is referring specifically to the immediate Mt York precinct – the day use area and cliff zone – which only represents a comparatively small/compact part of the reserve’s overall trail network. The statement

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					trails are actually “a destination unto themselves” for mountain bike enthusiasts.	in the PoM is therefore correct as it is. No action/amendment required.
1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	The risk, and actual incidence, of collisions between mountain bikers and other trail users is overstated in the PoM – such as the “significantly” increased “risk of collision” when mountain bikers are travelling downhill at speed on the busier upper section of Cox’s Road (Page 66) or where sight-lines may be limited (Page 114). Acknowledges “that potential hazards do exist from irresponsible riding [and] cases of actual accidents or injuries are rarely reported”, but that “perceptions [as now stated in PoM] does not match the observed evidence” and that mountain biking and walkers can jointly use routes with positive experiences for the majority “with appropriate management tools” as has been the experience on managed shared trails in NZ.	PoM proposes high traffic shared use area on the upper section of Cox’s Road as a dismount/walk area for mountain bikers (and horseriders) as the most appropriate management approach to reducing potential conflicts and risks in this high use zone with heritage values. (Pages 110 and 114 and Action 4.9 A & B). Amend PoM to acknowledge that “potential” collision risk between walkers and mountain bikers can be “considerable” in some locations, while also acknowledging that few actual incidents have been reported.

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1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	The PoM overstates the impact of mountain biking on unconsolidated/natural track surfaces (Pages 77-8 and 114) when compared with foot traffic, citing studies from the USA and Tasmania. However concedes that rutting, erosion and drainage modifications are a possibility as well as that that skidding tyres and wet weather use cause significant track surface impacts. Noted that track design and construction are more significant determinants on track surface impacts than activity type.	Track design and construction are significant determinants on track surface resilience and usage impacts, but mountain biking impacts can be significant especially on sandstone-derived soils in sloping terrain, and exacerbated by skidding and wet conditions. Amend PoM to recognise importance of track design, construction and maintenance and greater mountain bike impacts from tyre skidding and wet weather usage.
1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	Support for track condition monitoring and early detection of track surface impacts and corrective maintenance.	Track design, construction and maintenance are significant determinants on track surface resilience and usage impacts, Amend PoM to recognise importance of track design, construction and maintenance and need for track condition monitoring and early detection of track surface impacts and corrective maintenance.
1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	Mountain bike usage impacts should be addressed by “a clear and transparent process ... that attempts all other	The PoM provides for continued monitoring of mountain bike impacts across the track network (Page 110 and Action 4.9 C), and consultation with mountain bike user groups in

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					avenues of addressing the issue before exclusions are implemented”.	track management (Page 114). However an adaptive management approach - with progressively escalating management responses to heritage value or track condition impacts - warrants elaboration/explanation. Amend PoM to elaborate adaptive management approach, including possible response stages, to impacts of mountain bike riding.
1	Blue Mountains/ Lithgow	Recreation user group (mountain bikes)	25 March	Letter	Suggestion that the International Mountain Bike Association’s “rules of trail” be applied to mountain bike activities within the reserve.	Code of conduct guidelines would be a useful management tool, but require tailoring to local conditions. Amend PoM to refer to application of principles as found in International Mountain Bike Association’s “rules of trail”.
9	Sydney Metro	Recreation User	8 April	E-mail	Mountain bike riders should be consulted regarding track management, especially before excluding riders from challenging sections of track that “look impassable to the uninitiated”.	PoM provides for consultation with mountain bike user groups in track management, particularly in regard to managing mountain bike use impacts and potentially excluding mountain biking from some areas (page 114). No action/amendment required.
10	Blue Mountains/ Lithgow	Heritage Group	10 April	Letter	Mountain bike and horseriding “should not be permitted on any of Cox’s Road”. These activities “should only be permitted on the most robust” of the historic roads.	The PoM acknowledges the potential for mountain biking and horseriding to impact the heritage fabric/values of the historic roads, and includes provisions to monitor and limit the impacts of these activities (Page 101-2 and 114). Mountain bikers and horseriders will be excluded from the upper section of Cox’s Road (in the vicinity of the cliff edge and

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						<p>The Block) and redirected to Cox's alternative Descent, and also required to "walk" the section of road immediately adjacent to the Day Use Area (Page 114). However the lower/northern sections of Cox's Road are considered less susceptible to adverse impacts to heritage fabric from these recreational uses.</p> <p>Amend PoM to elaborate potential management responses, including possible adaptive management approaches and possible response stages, to mountain bike riding and horseriding impacts on heritage fabric/values.</p>
Walking Track Network (4.4.3) and Information and Interpretation (4.4.7)						
6	Local resident (Mt Victoria)	Local, regular users	4 April	Feed-back Form	Need for short easy walks with improved interpretation – such as "small metal signs at ground level ... with a printed guide which should be sold at outlets".	The PoM acknowledges the need for improved on-site interpretation and short (loop) walks within the reserve – particularly in the Mt York area (Pages 106-8 and 116-7). The PoM already includes provisions for upgrading the existing short walking tracks in the Mt York Day Use Area (Action 4.1 E), formalisation of a loop walking track along the base of the escarpment from Cox's Road to Barden's Lookout and return across the ridgetop (Page 110, figure 13 and Action 4.7 C & D), and further development and promotion of Berghofer's Pass as an "easy" walk (Page 110). The PoM also includes several provisions to improve the area's interpretation,

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						including the preparation of an Interpretive Plan and improved on-site visitor information (Pages 117-8 and Action 4.11 B). No action/amendment required.
Camping (4.4.6)						
2	Sydney Metro	Recreation user group (rock climbing)	25 March	Letter	Maintenance of a primitive or basic camping option within the reserve is supported. Recommendation that any camping area be a "Fuel Stove Only Area", if not year-round then at least for the fire safety danger period from, say, November to March (as is the situation at Mount Arapiles, a major climbing destination in Victoria's Wimmera District),	Valuable suggestion to address potential fire danger hazard t from the proposed camping areas. Amend PoM to provide for both the short-term and long-term primitive camping areas at Mount York, as well as camping at Lockyer's Line of Road Hartley Vale Trackhead and Mitchell's Ridge Lookout, to be "Fuel Stove Only" areas for the fire danger period from November to March with fires permitted only at other times.
4	Blue Mountains/ Lithgow	Nature conservation and commercial tour operator	31 March	Letter	The existing "unofficial" camping area is the preferred location for accommodating camping, and its impacts, within the reserve.	The PoM provides for formalisation of the existing "unofficial" camping area on the margin of the Mount York Day Use Area in the short term (Page 116 and Action 4.10 A), and that the longer-term development of a primitive camping area elsewhere will require a more detailed investigation of the fauna values/impacts of this alternative area (Page 119). No action/amendment required.
7	Local resident (Mt	Neighbour	Un-dated	Feed-back	Camp sites are "not appropriate" having no power,	"Basic" or "primitive" standard camping is a valid part of the recreation opportunity

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	Victoria)			Form	water, showers or flush toilets - "this is the 21 st Century and not the third world".	spectrum, and an experience that is sought by many members of the community. Mount York is one of the few locations in the Blue Mountains where this opportunity is offered. The PoM provides for the continuation of this activity/experience in a managed setting. No action/amendment required.
Camping (4.4.6) and Protection of Non-Aboriginal Values (4.2)						
10	Blue Mountains/ Lithgow	Heritage Group	10 April	Letter	An archaeological survey should be carried out prior to establishing the proposed camping area opposite Barden's Lookout to identify any sites of "Aboriginal or European heritage significance".	The PoM identifies the development of a primitive camping area at this site as a long-term option (Page 116 and Action 4.10 B) which is dependent on funding and other arrangements, consequently the development of the primitive camping area may not proceed during the life of this PoM. Amend PoM to identify the need for a heritage/archaeological investigation of the proposed long-term primitive camping area before the development of this facility, and that the proposal may be modified or relocated if significant adverse impacts are likely.
Camping (4.4.6) and Bushland Management (4.5)						
4	Blue Mountains/ Lithgow	Nature conservation and commercial tour operator	31 March	Letter	Site of the proposed primitive camping area identified as a long-term development is a uniquely accessible example of a high altitude grassy woodland habitat, which is	The PoM identifies the development of a primitive camping area at this site as a long-term option (Page 116 and Action 4.10 B), but also recognises, as an opportunity, that "More detailed information on fauna will be necessary before development of the

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					relatively uncommon across the mountains and an important habitat for bird species dependant on a grass understorey and leaf litter (such as the Spotted Quail-thrush, Buff-rumped Thornbill, Scarlet Robin, Flame Robin, Red-browed Treecreeper, White-eared Honeyeater and Superb Lyrebird) many\ of which may be declining. Creation of the camping area will “seriously impact on the habitat value of this particular site” and should not proceed.	proposed camping area” (Page 119). As a long-term option, dependent on funding and other arrangements, the development of the primitive camping area may not proceed during the life of this PoM. Amend PoM to identify the need for more detailed investigation of the habitat and conservation value of the proposed long-term primitive camping area before the development of this facility, and that the proposal may be modified or relocated if significant adverse impacts are likely.
Information and Interpretation (4.4.7)						
3	Local resident (Mt Victoria)	Local, regular users	26 March	Feed-back Form	Wish that “more attention will be given to the display of interpretive material”.	The PoM includes several provisions to improve the area’s interpretation, including the preparation of an Interpretive Plan and improved on-site visitor information (Pages 117-8 and Action 4.11 B). No action/amendment required.
6	Local resident (Mt Victoria)	Local, regular users	4 April	Feed-back Form	More information should be provided regarding the “old coal mine”, known as “Dixon’s Mine”, located “off south end of Lockyer’s”.	The PoM makes brief mention of this feature – as a “19th Century mine site, and associated access road and dry stone walling” but incorrectly locates it off the “northern end of Lockyer’s Line of Road”. (Page 34). Amend plan to correct reference to the coal mine’s location, and provide additional

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						descriptive information if this can be easily obtained.
10	Blue Mountains/ Lithgow	Heritage Group	10 April	Letter	Importance of developing a community understanding of the historic importance of the reserve's four heritage roads. "A plan for signage which is informative, consistent rugged and aesthetically pleasing should be developed for the area." Interpretation of Cox's Road should be co-ordinated along all the original route of this historic road through the entire Blue Mountains area "to increase the knowledge and satisfaction of both residents and tourists".	The PoM includes several provisions to improve the area's interpretation, including the preparation of an Interpretive Plan and improved on-site visitor information (Pages 117-8 and Action 4.11 B). No action/amendment required.
Bushland Management (4.5)						
4	Blue Mountains/ Lithgow	Nature conservation and commercial tour operator	31 March	Letter	Mt York is a high value fauna habitat "unique in the Blue Mountains and any further disturbance of intact bushland in this area should be avoided".	The PoM provides for maintenance of the vast majority of the reserve as natural bushland, and includes measures to minimise the adverse impacts of use and limited development of the area. No action/amendment required.
4	Blue Mountains/ Lithgow	Nature conservation and commercial tour operator	31 March	Letter	A more "aggressive" approach is needed to removal of the mature introduced pine trees in the Mount York Day Use Area, to	The PoM endeavours to balance the ecological/weed threat posed by these existing mature pines and their amenity role in the Mount York Day Use Area. Seedling removal is recommended, with the mature pines to be

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					prevent further invasion of bushland and spread by Yellow-tailed Black-cockatoos.	removed at the end of their natural life. Amend PoM outlining recommended removal of pine seedlings, however removal of mature pine remains a lower priority considering the significant number of dead and senescing natives tree in the reserve that require active management (removal or dead-wooding)
Fire Management (4.6)						
7	Local resident (Mt Victoria)	Neighbour	Un-dated	Feed-back Form	Rubbish being dumped in the reserve "is a fire hazard just waiting for a match".	The PoM acknowledges that rubbish dumping is an issue in parts of the reserve, such as the large cleared roadside area near Barden's Lookout and the Mitchell's Ridge area (Pages 51, 67, 71 and 118-9). Proposed landscaping and facility works at Barden's Lookout will reduce the appeal of this site for rubbish dumping (Figure 21), and the PoM includes specific provisions requiring the removal or dumped rubbish "as soon as possible after detection" (Action 5.1 C).and for liaison with reserve neighbours to discourage boundary dumping (Action 5.1 E). No action/amendment required.
10	Blue Mountains/ Lithgow	Agency (Lithgow City Council)	14 April	Letter	PoM implies that Blue Mountains City Council be the responsible agency for the approval of fire management activities within the entire reserve, However bushfire responsibilities with in the	The PoM provides for clarification of fire management responsibility for that part of the reserve within the City of Lithgow LGA (Page 121 and Action 6.1 F). Amend PoM to indicate that fire use and management approvals for that part of the reserve within the City of Lithgow LGA are

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					Lithgow City Council LGA should remain with the Lithgow Rural Fire Service.	the responsibility of the Lithgow Rural Fire Service, while stressing the need for a co-ordinated approach to fire management across the reserve.
12	Blue Mountains/ Lithgow	Agency (Lithgow District Bush Fire Management Committee)	17 April	Letter	Fire use and management approvals for that part of the reserve within the City of Lithgow LGA are to remain with the Lithgow District Bush Fire Management Committee.	The PoM provides for clarification of fire management responsibility for that part of the reserve within the City of Lithgow LGA (Page 121 and Action 6.1 F). This submission clarifies the situation and obviates this suggested action. Amend PoM to indicate that fire use and management approvals for that part of the reserve within the City of Lithgow LGA are the responsibility of the Lithgow District Bush Fire Management Committee, while stressing the need for a co-ordinated approach to fire management across the reserve.
14	Blue Mountains/ Lithgow	Agency (Lithgow City Council – second submission)	5 May	Letter	Supporting the Lithgow District Bush Fire Management Committee’s submission that fire use and management approvals for that part of the reserve within the City of Lithgow LGA are to remain with the Lithgow District Bush Fire Management Committee.	The PoM provides for clarification of fire management responsibility for that part of the reserve within the City of Lithgow LGA (Page 121 and Action 6.1 F). This submission clarifies the situation and obviates this suggested action. Amend PoM to indicate that fire use and management approvals for parts of the reserve in the City of Lithgow LGA are the responsibility of the Lithgow District Bush Fire Management Committee, while stressing the need for co-ordinated fire management across the reserve.

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Reserve Administration (4.7)						
11	Blue Mountains/ Lithgow	Agency (Lithgow City Council)	14 April	Letter	Request that the licensees of the Crown Land, which comprises much of that part of the reserve within the Lithgow City Council LGA, be “consulted on an individual basis, so that they may fully understand the implications” of the PoM and “also understand any future management arrangements for the parcel of land”.	A face-to-face meeting was held with the licensees of parcel Lot 3 DP 82098 during preparation of the Draft PoM. The licensees also attended the public meeting on the Draft PoM on 19 March 2008 where further individual discussions were held and another individual meeting offered to the licensees, however they did not consider this follow-up meeting warranted and were generally comfortable with the provisions contained in the PoM in relation to their parcel. No action/amendment required.
11	Blue Mountains/ Lithgow	Agency (Lithgow City Council)	14 April	Letter	Support for the PoM’s proposal that the Blue Mountains City Council be “appointed the trustee of all lands within the Reserve including those within the Lithgow LGA” (Page 123 and Action 7.2 A)	Amend PoM to note Lithgow City Council’s support for appointing Blue Mountains City Council as trustee for the entire reserve, inducing those areas within the Lithgow LGA.
13	Sydney Metro	Conservation Group	1 May	Letter	Reserve should be added to the Blue Mountains National Park due to national, and possibly international, significance as a convict site and to provide additional management resources.	Blue Mountains City Council’s preference is to maintain the reserve as a destination/attraction under Council management to complement surrounding NPWS managed areas. No action/amendment required.
13	Sydney Metro	Conservation Group	1 May	Letter	“The complexity of the proposed governance through	The PoM proposes that the Blue Mountains City Council be “appointed the trustee of all

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					a reserve trust and two local governments is not supported” and a regional reserve committee, or national park reservation, is preferred.	lands within the Reserve including those within the Lithgow LGA” (Page 123 and Action 7.2 A). This will simplify reserve management, providing greater efficiency and consistency in decision-making (as guided by the PoM). No action/amendment required.
Action Plan (6)						
8	Blue Mountains/ Lithgow	Individual	7 April	E-mail	The PoM does not indicate the period over which it will be implemented, as required under the <i>Local Government Act 1993</i> and <i>Crown Lands Act 1989</i> , nor the “commencement and completion dates for each action in the Action Plan”.	The PoM's Action Plan, and accompanying table, identifies time periods for the various management actions proposed – including short-term, medium-term, long-term, ongoing, annually and biannually as well as specific financial years in a minority of instances. These time intervals are consistent with the requirements of the <i>Local Government Act</i> and accord with the approach adopted in most other plans of management prepared under this legislative framework. The PoM also identifies that the actual implementation of management actions is dependent on Council's budgetary processes and available resources (Page 140). It may be useful to place indicative time frames around the short, medium and long term categories – as indicative guides only – such as short-term = 1-2 years, medium-term = 3-5 years, and long-term = 6 years and beyond. Amend PoM to identify indicative time periods for short-term term (1-2 years), medium-term (3-5 years), and long-term (6

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						years and beyond) management actions.
8	Blue Mountains/ Lithgow	Individual	7 April	E-mail	The PoM does not indicate the “specific means to achieve every action in the Action Plan” as required under the <i>Local Government Act 1993</i> .	The PoM’s Action Table identifies potential resource availabilities, indicative costings and possible funding sources as well as allocating a priority to each action. This approach accords with that adopted in most other plans of management prepared under this legislative framework. No action/amendment required.
8	Blue Mountains/ Lithgow	Individual	7 April	E-mail	The PoM does not indicate the “manner in which the Council proposes to assess its performance with respect to plan of management objectives and performance targets” as required under the <i>Local Government Act 1993</i> .	The PoM’s Action Table identifies monitoring techniques and evaluation criteria/indicators d for each specific action. This approach accords with that adopted in most other plans of management prepared under this legislative framework. No action/amendment required.