



SUBMISSION TO BLUE MOUNTAINS CITY COUNCIL

LEURA CASCADES PRECINCT PLAN – DRAFT CONCEPT DESIGN

OCTOBER 2023

Introduction

The Leura Falls Creek Catchment Group has been engaged with council since the outset of the planning process for Leura Cascades. We were privileged to receive a briefing from the planning team in late 2022, and many of our members also attended subsequent community consultations and discussions.

The Catchment Group continues to be impressed by the creative thinking of council's team in relation to this project, and for the consultative approach taken throughout. The Catchment Group is very supportive of the key components of the draft concept design. However we are disappointed that some of our earlier suggestions have not been taken up, particularly in relation to the proposed night walk, and the re-naturalisation of the creek line through the picnic area of the Lower Cascades Precinct. We also have concerns about aspects of accessibility.

Who we are

The Leura Falls Creek Catchment Group is an environmental conservation planning and advocacy body consisting of local residents and Bushcare volunteers who take an interest in the natural areas of Leura Falls Creek catchment. Bushcare groups currently active within the catchment are:

- Banksia Park Bushcare Group
- Leura Park/Cascades Bushcare Group
- Vale Street Bushcare Group
- Govett Street Bushcare Group
- Gordon Falls Bushcare Group
- Everglades Bushcare Group
- Everglades Landcare Group
- Sublime Point Bushcare Group
- Prince Henry Cliff Walk Bushcare Group (NPWS)
- Gun Gun Bushcare Group (NPWS)

The Catchment Group works closely with Blue Mountains City Council, and with the National Parks and Wildlife Service, who participate in all our meetings.

Supported elements of the concept design

Consistent with our earlier submission, the Catchment Group supports the key elements of the draft concept design:

- Making Chelmsford Bridge and the lower precinct a vehicle-free zone,

- Upgrading and rationalising parking, and confining it to the upper precinct,
- Protecting the magnificent large eucalypt in the upper precinct parking area, and making a feature of it,
- Removing the old toilets in the mock-rock structure, and building new accessible toilets,
- Rationalising bus stops on Cliff Drive,
- Addressing drainage problems in the area of the former men's baths,
- Improving accessibility and DDA compliance, particularly by building a new accessible path between the upper and lower precincts,
- Improving picnic areas and children's play areas,
- Upgrading walking tracks, bridge, and wayfinding on the track connecting to the falls and Grand Clifftop Walk.

Areas for improvement: Night walk

We submit that there are four factors which require a re-think of the proposed night walk:

- It is increasingly recognised that natural darkness has a conservation value in itself, comparable to the value of clean water, clean air, natural vegetation and native wildlife. In such a sensitive heritage area, abutting the World Heritage Area, artificial light should not be introduced unless there is a real necessity or significant benefits,
- The fact that there are already more accessible areas of floodlighting and night walks available very close by, at Echo Point and Katoomba Falls,
- Possible risks to public safety because of the relative isolation of this area at night,
- The likely negative effect on wildlife.

In this submission, we focus particularly on the last of these factors: the negative effects of illumination on wildlife have been well-documented in many different contexts around the world, and numerous scientific studies are cited in the Australian Government's *National Light Pollution Guidelines for Wildlife*, updated in May 2023. According to these Guidelines:

Artificial light is known to adversely affect many species (Russart & Nelson 2018a; Gaston, Visser & Holker 2018) and ecological communities (Sanders & Gaston 2018; Bennie et al. 2016). It can change behaviour and/or physiology, reducing survivorship or reproductive output. It can also have the indirect effect of changing the availability of habitat or food resources. It can attract predators and invasive pests, both of which may pose a threat to listed species.¹

Many species of mammals, birds, reptiles and insects are present at Leura Cascades, and each of these will be affected in different ways by the introduction of artificial light. It is sobering to discover that one of the most widely quoted pieces of research in this area relates to wallabies. The National Guidelines cite research by Dr Kylie Robert of La Trobe University on Tammar wallabies in WA², which showed that wallabies exposed to artificial light delayed reproduction, by comparison with a

¹ *National Light Pollution Guidelines for Wildlife*, Australian Government, Department of Climate Change, Energy, the Environment and Water, May 2023, at p.4

² Robert, KA, Lesku, JA, Partecke, J & Chambers, B 2015, "Artificial light at night desynchronizes strictly seasonal reproduction in a wild mammal", *Proceedings of the Royal Society B: Biological Sciences*, Vol 282, 20151745

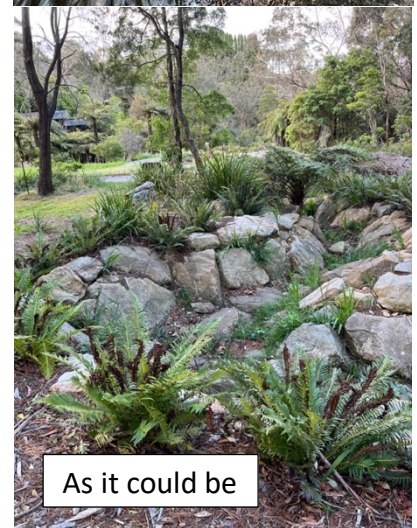
control group which were not exposed. Wallabies are shy animals that are not often seen, but as Bushcare volunteers we are acutely aware of their presence in the Leura Cascades area by abundant evidence of their scats, and plants which have been grazed upon by them.

We note that the “lighting will be sensitively located to minimise impact on nocturnal fauna and obtrusive light spill into dark surrounds”, that the cliffs will not be floodlit at the falls lookout, and that the aim is for a “dark sky experience”. That is a laudable aim, but is undercut by the fact that Chelmsford Bridge and the adjoining cascades will be floodlit, and that – in the interests of public safety - the parking area and toilets will be brightly lit until late in the night. It is ironic that the “dark sky experience” is only achieved by lighting up the whole area leading up to it for several hundred metres – an area which is currently 100% “dark sky”.

The National Guidelines require that where there is an important habitat for listed species within 20 kilometers of the site, a species-specific environmental assessment should be carried out on the impact of the proposed artificial light on these species. Listed species known to be present in the general vicinity of Leura Cascades include *Daysurus maculatus* (spotted quoll), *Calyptorhynchus lathamii* (Glossy black cockatoo), and *Callocephalon fimbriatum* (Gang-gang cockatoo). At minimum, council should commission an environmental impact assessment by a person with appropriate expertise in this area of science, before any final decision is made to go ahead with the proposed night walk.

Areas for improvement: re-naturalisation of the creek line

In our January 2023 submission, the Catchment Group made the point that while this is an area of great natural beauty, the Leura Falls Creek has been channelled into an exceptionally ugly concrete drain through the picnic area (top right), then diverted through a pipe under the lawn in the area of the former men’s baths. We have suggested that council give consideration to “re-naturalising” this section of the creek. If it is considered impractical to dig up the pipe under the lawn, council might at minimum get rid of the ugly concrete drain, consistent with its commitment to Water Sensitive Urban Design. Council has developed considerable expertise in this kind of activity, and has done excellent work in other parts of the LGA, and the Leura Falls Creek catchment in particular. The photograph (below right) of work on Banksia Streamlet in Katoomba provides a good example of what council and its contractors can do. Re-naturalisation of the creek line in Leura Cascades - a very public location - will provide a great showcase for council’s commitment to better management of our catchments, and a great teaching opportunity to educate locals and visitors about the protection of Sydney’s drinking water.



Areas for improvement: disability access

The draft concept design gives prominence to issues of accessibility, and to Disability Discrimination Act design standards. The new toilets in the upper precinct will be accessible, and the design includes an accessible path between the upper and lower precincts. However, the Catchment Group

is concerned to read that this is described as a “future accessible path”, and we guess this means that funding has still not been obtained for this crucial element of the design. The impact of this will be that, once vehicular access to the lower precinct is closed, mobility impaired people will be effectively denied access to the whole lower area. It is noted that the plan shows two parking spots adjacent to Chelmsford Bridge (on the Cliff Drive side), but again these are described only as “opportunity for additional accessible parking”. However these spots are a long way from the picnic area and viewpoints of the lower precinct, and thus not actually “accessible” in any real sense. Of course, if – despite these challenges - a mobility impaired person was able to make their way in to the lower precinct, there would not be an accessible toilet available to them.

The cruel reality would be that, despite all the references to accessibility and DDA standards, Leura Cascades would be even less accessible to mobility impaired people than it has been in the past. It is crucial that council obtain funding for construction of the accessible pathway at the same time as the other proposed changes are made.

Conclusion

Thank you for the opportunity to provide further input to this important planning process. Members of the Catchment Group will of course be very happy to discuss any of these issues and suggestions with you or members of your team.

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