



**NSW NATIONAL PARKS & WILDLIFE SERVICE**

# **Submissions Report**

**Light to Light Walk Upgrade**

**Draft Review of Environmental Factors**



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## Summary

The National Parks and Wildlife Service (NPWS) was awarded funding to upgrade and realign the existing Light to Light Walk in Beowa National Park. Planning for the Light to Light Upgrade project commenced in 2018 and has included public consultation on the plan of management amendment and the *Draft Light to Light Walk Strategy*.

This submissions report documents the consultation carried out for the draft *Review of Environmental Factors: Light to Light Walk Upgrade* (the draft REF). The draft REF was exhibited between **15 September 2021** and **15 October 2021**. A total of **142 submissions** were received.

In addition to the public consultation process, targeted consultation was carried out with various other NSW Government agencies and the Aboriginal community, including native title claimants.

Responses received from these consultation processes raised 301 individual matters.

All points raised in submissions were analysed and grouped into themes. The major themes raised were:

- economics
- environmental impact
- change of park's character
- Aboriginal and historic cultural heritage
- visitor experience
- Green Cape Maritime Precinct.

These themes and all other points raised in the submissions and responses are discussed in this report.

## Changes made to the project

The following changes have been made as a result of the matters raised:

- Strategic fire advantage zones will not be established around the hut accommodation precincts at Mowarry Point and Hegartys Bay.
- In consultation with NSW Department of Primary Industries – Fisheries, mitigation measures will be put in place to manage the potential impacts of the project on fisheries, such as:
  - targeted signage along the walking track, including multilingual signs
  - online content about fisheries on the NPWS Light to Light Walk webpage.
- A change to maintenance regime of the existing Hegartys Bay vehicle track to avoid impact on a threatened plant species.

# 1. Light to Light Walk Upgrade

## 1.1 Introduction

In 2018, the NSW National Parks and Wildlife Service (NPWS) was awarded \$7.9 million from the NSW Government's Regional Growth – Environment and Tourism Fund to upgrade and realign the existing Light to Light Walk to create a signature nature-based walking experience. The funding program commenced in July 2018 and, subject to planning and construction timeframes, the project is expected to be complete in late 2022.

The Light to Light Walk Upgrade project proposes upgrading and realigning sections of the current track, constructing new sections of walking track, and providing hut and lighthouse-style accommodation and walk-in camping options for walkers in Beowa National Park. The location of the proposal is shown in Figure 1.

The upgraded Light to Light Walk will allow visitors to undertake an immersive nature-based, multi-day walk experience that highlights the many special characteristics of the NSW Far South Coast, including remoteness, coastal connection and cultural heritage.

The walk upgrade is designed to increase visitor appreciation and engagement with the conservation values of the park, while protecting park values and minimising environmental impacts.

The project involves a range of works that are subject to funding. Works would include:

- construction and realignment of new walking tracks, reinstatement of tracks damaged by bushfire, and closure and revegetation of sections of track no longer required
- construction of new hut accommodation and associated visitor facilities at Mowarry Point and Hegartys Bay
- upgrade works to precinct parking at Pulpit Rock
- formalisation of existing camping facilities at Mowarry Point.

NPWS and specialist track designers have undertaken an extensive investigation of design and alignment, with further advice sought from environmental specialists and the Aboriginal community to determine the track route. This track alignment was selected to maximise the visitor experience and minimise environmental, Aboriginal cultural and historic heritage impacts, including the avoidance of impacts on sensitive heath communities and Aboriginal heritage sites.

The track will predominantly consist of a natural surface offering an easy to moderate level walking track consistent with the track condition before the 2019–20 bushfires.

Two sites have been identified as appropriate for hut accommodation: Mowarry Point and Hegartys Bay. The accommodation design and development will be in keeping with park values for sustainability, visual amenity, and environmental and conservation values.

Although not currently being proposed, a project to reconfigure buildings at Green Cape Lightstation to provide a third nights accommodation for Light to Light walkers may commence if funding becomes available. This would be subject to separate environmental and heritage assessments.



# Light to Light Walk Overview

## Ben Boyd National Park



Figure 1 Light to Light Walk Upgrade project

A draft *Review of Environmental Factors: Light to Light Walk Upgrade* (the draft REF) to inform the proposed upgrades to the Light to Light Walk closed for consultation on 15 October 2021. Public consultation on the draft REF provided an important opportunity for the community to have a say in relation to this activity proposed by NPWS.

The Sapphire Coast Area (South Coast Branch) of the National Parks and Wildlife Service (NPWS) is the proponent (responsible authority) for the Light to Light Walk Upgrade components in Beowa National Park.

The public exhibition and consultation process associated with the project's draft review of environmental factors was delivered by NPWS Sapphire Coast Area.

## 1.2 Project documents

### 1.2.1 Beowa National Park and Bell Bird Creek Nature Reserve Plan of Management

Prior to the exhibition of the draft REF for the Light to Light Walk Upgrade, community consultation was conducted by NPWS in 2019. Feedback was gathered from local organisations, businesses, residents and members of the community on the *Ben Boyd National Park and Bell Bird Creek Nature Reserve Plan of Management Draft Amendment* and the *Draft Light to Light Walk Strategy*. Both were exhibited between 12 July 2019 and 26 August 2019.

Open house public information sessions were held at Pambula, Eden and Bega during the exhibition period. A total of **205 submissions** were received. These raised more than 1700 individual points.

All points raised in submissions were analysed and grouped into themes. Points and themes were then considered against set criteria to see if a change to the amendment or strategy were required.

The major themes raised in the submissions were:

1. new accommodation
2. Green Cape accommodation (not discussed in the draft REF)
3. camping on the Light to Light Walk
4. walking tracks
5. commercialisation
6. public vehicle access (not discussed in the draft REF).

In response to submissions, NPWS considered where changes could be made to revise the amendment or strategy, improving outcomes for visitors and for the park's natural and cultural heritage values. Not every theme led to changes. Changes that were made in response to issues and concerns raised in submissions can be summarised as follows:

- The privatisation of on-park accommodation – the walk will remain open to all types of visitors and will not be privatised. NPWS will own and operate all the accommodation.
- The potential loss of remote walk-in camping – NPWS will formalise low-key, walk-in only public camping facilities at Mowarry Point, and a new walk-in only public camping site will be constructed at Bittangabee Bay.
- Environmental and cultural heritage impacts – cultural heritage and environmental assessment have been completed along the length of the proposed route before and



after the 2019–20 bushfires, and construction will not start until both assessments have been approved.

- Continuing use of Green Cape – casual short-stay bookings for a 4-week period each year during winter will be available.
- Concerns about day visitor access – day use access to Leather Jacket Bay, Mowarry, and Hegartys Bay will continue, and day visitors will still be able to walk the track.

The Beowa National Park and Bell Bird Creek Nature Reserve Plan of Management Amendment: Light to Light Walk improvements was adopted by the Minister for the Environment on 11 January 2021. The amended plan of management and the Light to Light Walk Strategy (which was published on 30 of August 2021) are available on the NSW Department of Planning and Environment (the department) – Environment, Energy and Science website.

## 1.2.2 Light to Light Walk Upgrade – Draft Review of Environmental Factors

The draft *Review of Environmental Factors: Light to Light Walk Upgrade* (the draft REF) was prepared in accordance with NPWS policy and procedural documents. The proposal is located within Beowa National Park. No works are proposed off-park as part of the activity description.

The draft REF examines the likelihood of environmental impacts resulting from the proposal. The REF also prescribes the measures required to avoid, minimise or mitigate adverse impacts and defines the significance of those residual impacts with respect to the natural, cultural and social values of the national park.

The draft REF for this project meets the requirements of Division 5.1 of the NSW *Environmental Planning and Assessment Act 1979* and clause 228 of the Environmental Planning and Assessment Regulation 2000.

## 1.3 Exhibition and consultation

The draft *Review of Environmental Factors: Light to Light Walk Upgrade* (the draft REF) was placed on public exhibition from **15 September 2021** to **15 October 2021**.

### 1.3.1 Communication methods

Due to the application of COVID-safe protocols and general NSW restrictions in place during the public exhibition period, online engagement and promotions were preferred. Communication methods are detailed below.

### 1.3.2 Project webpage content

The draft REF was placed on the department's Environment, Energy and Science website, which provided overall project information and an exhibition webpage – the focal point for consultation. The exhibition webpage provided a summary of the REF and a downloadable link to the draft REF.

A consultation survey was developed and made available on the exhibition webpage. Respondents were also invited to provide their submission in an email or as an attachment. The exhibition was also promoted on the NSW Government 'Have your say' website, which included a brief explanation of the project and provided a link to the exhibition webpage.

### **1.3.3 Notifications**

#### **By mail**

No mail notifications were provided for this exhibition.

#### **By email**

At the start of the exhibition period, notification emails were sent to all parties that had registered their interest in the project (524 recipients at the time).

Notification emails were also sent to the Bega Valley Shire Council, community groups and relevant NSW Government agencies.

A summary of the information in the draft REF about Aboriginal cultural heritage was also sent to the Aboriginal parties registered by the consultant employed to prepare the Aboriginal Cultural Heritage Assessment Report.

#### **Targeted community and industry consultation**

Local community associations, organisations, tourism and commercial business owners with a vested or known interest in the national park were notified via email that the exhibition period had begun.

A Light to Light Walk Stakeholder Reference Group was established in September 2021 to enable the views from a broad section of the community to be considered in developing the project. The group includes representatives from a broad range of local and regional stakeholder groups and organisations. Participation in the group is voluntary. The group had its first meeting on 28 September 2021. Several project-related matters were discussed at this meeting, including the draft REF.

### **1.3.4 Media release and other promotional content**

A media release was issued on 15 September 2021 to encourage people to visit the exhibition webpage. The following news outlets ran stories about the project and exhibition: *Eden Imlay Magnet*, *Bega District News* and *Merimbula News Weekly*.

Public notices were placed in the *Eden Imlay Magnet* on 16 September, *Bega District News* on 17 September and *Merimbula News Weekly* on 22 September.

### **1.3.5 Consultation processes**

The consultation process included 3 approaches: online public exhibition, targeted consultation with the Aboriginal community, and statutory notifications.

#### **Public exhibition**

The draft REF was made publicly available on 15 September 2021, with a media release, distribution of notification emails and release of the documents onto the exhibition website.

The public were asked to provide comments online using the 'Have your say' consultation portal on the department's Environment, Energy and Science website and also the NSW Government 'Have your say' website. These websites provide information on the purpose and intent of the draft REF.

## Aboriginal community engagement

NPWS is engaging with the Aboriginal community as part of the requirements of preparing an Aboriginal Cultural Heritage Assessment Report (ACHAR). NPWS has contracted an experienced consultant archaeologist to consult with the 3 Registered Aboriginal Parties who have a vested interest in the project and who have contributed to the cultural heritage assessment.

The ACHAR is informing the finalisation of the REF and the decision whether an Aboriginal Heritage Impact Permit is required. Due to the confidential and sensitive nature of the information in the ACHAR, the report will not be placed on public exhibition.

As the representative of the South Coast Peoples Native Title Claim, NTSCORP has also been consulted as a part of this Aboriginal community engagement.

## Statutory notification and agency consultation

Government agencies were notified that the exhibition period had commenced via email on 16 September 2021 (Table 1). A follow-up reminder was sent on 11 October 2021.

**Table 1 Targeted agency consultation**

Agency	Method	Date
NSW Department of Primary Industries (DPI) – Fisheries	Email	16 September 2021
Bega Valley Shire Council	Email	16 September 2021
Transport for NSW	Email	16 September 2021

## 2. Submissions received

### 2.1 Overview

A total of **142 submissions** were received from individuals and organisations during the exhibition/consultation period, comprising:

- 134 submissions from individuals (with 11 of these being form letters)
- 8 submissions from organisations, community groups and government agencies.

Most submissions were received via email, or through the department's Environment, Energy and Science 'Have your say' page. No submissions were received in hard-copy form.

### 2.2 How submissions were analysed

The following procedures were followed in handling the submissions received during the exhibition/consultation period:

- All submissions were filed in CM9 (NPWS internal document management system) and recorded in the project submission register (Excel spreadsheet).
- Identical copies of submissions by the same author were filed separately but treated as one submission.
- Multiple submissions from the same author that raised new or different issues were recorded and treated as separate submissions.
- Multiple submissions from the one address under different names were treated as separate submissions.
- All submissions received during the exhibition period up to midnight on 15 October 2021 have been included in this report. Only if prior agreement had been made with NPWS have late submissions been considered.
- Organisations requiring statutory notification who did not provide a submission or provided limited feedback were given another opportunity to provide comment in October 2021.

All points raised in submissions were recorded. Similar points were then grouped together into themes according to either:

- site-specific matters relating to a section of the draft REF or component of the proposal
- activity-specific matters relating to an issue across numerous sections of the draft REF.

All collated points within each theme were then considered to see if a change to the proposal was needed.

Changes were considered if any of the submissions raised points that met the following criteria:

- an alternative strategy or action that would better support delivery of the proposal's objectives
- new, updated or additional information of direct relevance to the impact assessment
- a basic factual or editorial error or omission that should be addressed through a change to the proposal.

## 2.3 Summary of submissions and their content

Eight submissions received provided overall support for the proposed Light to Light Walk Upgrade, and 26 raised some matters that required further consideration to some components of the project. Objections to the project in its entirety were made in 105 submissions. See Table 2.

**Table 2 Summary of submission position on the project**

Source	Total	Support	Further consideration	Objection
Individual	134	5	24	101
Commercial and non-commercial	6	1	1	4
Government agencies	2	2	1	0
<b>Total</b>	<b>142</b>	<b>8</b>	<b>26</b>	<b>105</b>

Note: Many submissions indicated general support for upgrading the walking track while also detailing objections to some parts of the proposal.

Many of the submissions raised similar issues to those received on the draft plan of management amendment and *Draft Light to Light Strategy* exhibited in 2019 (see Section 1.2). For a more detailed description of the feedback received on these documents and NPWS response, go to the Light to Light Walk Public Exhibition Report.

### 2.3.1 Matters raised in submissions

#### Matters raised by individuals

During exhibition and targeted consultation, 131 submissions were received from individual community members. The key themes raised in these submissions are summarised in Section 2.3.2, below. Many of the submissions raised similar issues to those received from the public on the *Draft Light to Light Walk Strategy* and the plan of management amendment.

Concerns were raised about commercialisation and revenue raising, as well as the impact the project might have on the environment, Aboriginal and historic heritage, visitor experience and the character of the park.

#### Matters raised by community groups and industry

During exhibition and targeted consultation, 6 submissions were received from community organisations. Submissions ranged from supportive with requested changes, to firm objection to the proposal.

#### Matters raised by government agencies

Statutory consultation was undertaken with government agencies with responses received from Bega Valley Shire Council, DPI – Fisheries and Transport for NSW.

Despite being outside of the South Coast People's Native Title Claim area, NTSCORP were also consulted as per a previous agreement that NPWS would include them in consultation phases for any on-park work on the NSW South Coast. However, they did not provide a response.

## 2.3.2 Key themes raised in submissions

A review of the submissions received identified several key themes. Table 3 categorises the number of submissions received for each key theme (and sub-theme) with an overall summary, and also indicates the section of the submissions report where the NPWS response to concerns are discussed. Submissions of general support with no specific reference to project elements are identified in Table 3 but are not considered further.

Many submissions raised matters that cut across multiple themes. Therefore, totals in the 'Number' column are greater than the number of submissions received.

**Table 3 Key themes raised in submissions**

Theme/ sub-theme	Number*	Overall summary of the theme	Response
<b>Theme – Overall</b>			
General support	8	Submissions providing simple support for the project which found the proposal of undertaking a multi-day walk and staying in hut-based accommodation appealing.	
<b>Theme – Economics</b>			<b>Section 3.1</b>
Commercialisation	40	Many submissions suggested that the proposal to build and operate huts is a commercial operation and that such an operation is not NPWS core business. Some submissions suggested the proposal was purely about revenue raising. Other submissions were concerned that NPWS would compete with existing tour operators and accommodation providers. Many submissions were opposed to commercial operators managing on-park accommodation.	Section 3.1.1
Investment choice	8	Some people felt that the proposal was an inappropriate investment and that funding would be better spent on other things such as upgrading existing facilities within the national park.	Section 3.1.2
<b>Theme – Environmental impact</b>			<b>Section 3.2</b>
Impact on the environment and special features of the park including:	64	Many suggested that the sustainability claims were misleading and that the proposal will have an impact on the environment and special features of the park.	Section 3.2.1
• Flora and fauna (including aquatic freshwater and marine)	14	Concerns were raised about the impact the project will have on the flora and fauna in Beowa National Park and the surrounding area.	Section 3.2.1
• Water quality	2	It was identified that measures need to be put in place during construction to ensure water quality is not impacted. Another submission raised concern about the impact that sewerage would have on water quality.	Section 3.2.1

Theme/ sub-theme	Number*	Overall summary of the theme	Response
<ul style="list-style-type: none"> <li>Draft REF fails to address environmental impacts</li> </ul>	17	Some believe that the draft REF does not adequately assess the potential environmental impacts.	Section 3.2.1
Against core objects of <i>National Parks and Wildlife Act 1974</i> (NPW Act)	8	Some suggested that the proposal contradicts the core objectives of the NPW Act and the principles of ecologically sustainable development.	Section 3.2.2
Bushfire impact	26	Some submissions raised that the biodiversity surveys were not undertaken after the 2019–20 bushfires, and therefore the impact of the bushfires has not been taken into consideration in the draft REF. Other submissions suggested that the proposal would increase pressure on an already fragile and impacted environment, potentially past the point from which the landscape could recover.	Section 3.2.3
Bushfire management	5	Some submissions raised concern that prescribed burning proposed to be undertaken around the hut accommodation to minimise the risk of bushfire could have an undesirable effect on certain species in the immediate vicinity and surrounding area.	Section 3.2.4
<b>Theme – Change of park’s character</b>			<b>Section 3.3</b>
Character of Beowa National Park	25	Some submissions identified that the lack of development in Beowa National Park is part of what makes it so beautiful and suggested that the proposed huts and associated facilities would have an impact on the visual amenity and character of the park. The potential loss of the sense of remoteness and solitude was also raised.	Section 3.3
<b>Theme – Aboriginal and historic cultural heritage</b>			<b>Section 3.4</b>
Impacts to Aboriginal and historic cultural heritage	12	Some submissions raised concerns about the impact the proposal will have on the Aboriginal and historic heritage of the area. Others raised concern about whether NPWS consulted with the Aboriginal community about the proposal.	Section 3.4
<b>Theme – Visitor experience</b>			<b>Section 3.5</b>
Cost	23	Some submissions raised concerns about the equity of the proposal, suggesting that the cost of staying in the huts may be too expensive for some people and that a focus on commercial interests and ‘high end’ customers may be to the detriment of other users.	Section 3.5.1

Theme/ sub-theme	Number*	Overall summary of the theme	Response
Camping access	16	<p>Many submissions welcomed the change to the proposal to allow pack camping at Mowarry Point but some raised concerns about formalising the camping space. They were concerned that the allotted area may not be adequate during busy periods.</p> <p>Some submissions opposed the proposal to prohibit camping at Hegartys Bay.</p>	Section 3.5.2
Increased visitor numbers	28	<p>Some submissions raised concerns that the proposal will lead to an increase in the number of people and that this will detract from the experience. It was also suggested that the visitors that stay in the huts may not value and respect the natural environment as much as pack campers.</p> <p>Others suggested that an increase in visitors would exceed the carrying capacity of the park.</p> <p>Concerns were also raised about the camping facilities and amenities in Beowa National Park and ability to adequately cater for an increased number of visitors.</p>	Section 3.5.3
Kayaking	1	<p>A submission emphasised the importance of safe landings with camping for sea kayaks along the NSW coast, and therefore the importance of maintaining access to Mowarry.</p>	Section 3.5.4
Vehicle access tracks	3	<p>A submission queried why NPWS is investing in accommodation but not upgrading the vehicle access tracks to Hegartys Bay and Mowarry Point.</p> <p>Another raised the concern that by upgrading the vehicle access tracks you are making areas more accessible to a greater number of people.</p>	Section 3.5.5
Noise pollution	4	<p>A few submissions raised concerns about the level of noise that would be caused by construction and the impact that this would have on park users. They also raised concerns about the ongoing level of noise that would be created by vehicles and helicopters used to service the hut accommodation.</p>	Section 3.5.6
Walking track alignment	6	<p>Several submissions strongly believe that the realignment of the walking track is unnecessary and that its construction outweighs the benefits. They believe that the existing track offers a different experience in terms of landscape, bird life and flora which walkers appreciate, particularly in spring.</p>	Section 3.5.7
<b>Theme – Green Cape Maritime Precinct</b>			<b>Section 3.6</b>



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Theme/ sub-theme	Number*	Overall summary of the theme	Response
Availability of Green Cape accommodation	6	A few submissions raised concerns about the need to ensure Green Cape is accessible to all, not just those walkers staying in the hut accommodation.	

\* Totals in the 'Number' column are greater than the number of submissions received because many submissions raised matters that cut across multiple themes.

## 3. Response to submissions by key theme

Every submission was reviewed, and each matter raised in submissions was categorised under the themes and sub-themes listed in Table 3 to aid in deciding the appropriate NPWS response or action, including changes to the project. These responses are discussed below under each theme. The following also outlines the reasoning where changes were not made.

### 3.1 Economics

#### 3.1.1 Commercialisation

NPWS considers the proposal is part of its core business of park management. One object of the *National Parks and Wildlife Act 1974* (NPW Act) is to foster public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation. NPWS expects that provision of huts for walkers on the upgraded Light to Light Walk will broaden the range of visitors able to undertake the walk and experience the park, and thereby generate greater public appreciation and understanding of the natural and cultural heritage of the park.

Through the public exhibition process for the plan of management amendment and *Draft Light to Light Walk Strategy*, NPWS recognised the concerns expressed about commercial managers operating on-park accommodation. As such, references to commercial operators managing or leasing accommodation have been removed from the amended plan of management and the *Light to Light Walk Strategy*. NPWS will manage all accommodation as noted in the *Light to Light Walk Strategy* and draft REF.

Commercial operators will be able to support walkers on the Light to Light, for example, by providing guiding, transport or food; and/or support the Light to Light operation, for example, by providing cleaning and maintenance services.

#### 3.1.2 Investment choice

Funding for the project is provided by the Regional Growth – Environment and Tourism Fund, which is managed by the NSW Government. Other funding has recently been committed to upgrading other precincts and access trails in the region. In the Beowa National Park, the Boyds Tower precinct, Green Cape car park and Bittangabee Bay and Saltwater campgrounds will be upgraded as will several fire trails. Separate environmental, Aboriginal and historic heritage planning approvals are required for these projects. The cumulative impact of these upgrades has been considered, and at this stage, no substantive cumulative impacts are anticipated.

### 3.2 Environmental impact

#### 3.2.1 Impact on the environment

Construction and management of huts on the Light to Light Walk will have some impact on the environment and special features of the park, but significant impacts are not anticipated.

Through the design and operation principles for the hut accommodation and walking track, set out in the draft REF, as well as detailed, in-depth environmental scoping studies, flora and fauna surveys and route selection, the impacts on natural values will be kept to a minimum.

Extensive environmental and cultural heritage assessments of multiple alignments over several years have allowed NPWS to decide on final routes of the walking track which have minimal impact. The alignments have also been scoped by NPWS and by a professional track designer/builder, whose design elements will be incorporated into the construction documentation. The track and hut building techniques have been carefully considered to reduce environmental impacts.

Measures will be put in place to mitigate the risks to soil, water, native vegetation, flora, fauna, community safety and Aboriginal and non-Aboriginal heritage. These measures include:

- a soil and water management plan
- a biodiversity management plan that sets out pre-clearing protocols, exclusion zones, and pest, weed and pathogen actions and procedures.

For a detailed summary of mitigation measures refer to Section 8 of the draft REF – Summary of Mitigation Measures.

An operational management plan will be developed, which will include ongoing monitoring to be undertaken to assess the impact of the proposal. If any negative impacts are detected, measures will be put in place to manage them.

NPWS will continue to work closely with DPI – Fisheries to manage intertidal harvesting along the coast that may result in degraded rock platforms. NPWS will also ensure the REF recognises the potential impact the proposal may have on the marine environment and the commercial and non-commercial fisheries operating in the area, and identifies mitigation measures.

The REF details the existing environment, nature and extent of impacts and proposes mitigation strategies in accordance with a risk management framework.

### **3.2.2 Against the core objects of National Parks and Wildlife Act 1974**

NPWS believe that the proposal is consistent with the core objects of the NPW Act and principles of ecologically sustainable development. In addition to the ‘conservation of nature, ... objects, places or features (including biological diversity) of cultural value within the landscape’ set out in the NPW Act, one of the objectives is also ‘fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation’. The NPW Act also sets out a number of management principles which includes ‘provision for sustainable visitor or tourist use and enjoyment that is compatible with the conservation of the national park’s natural and cultural values’. The proposed walking track and accommodation will provide sustainable tourism by allowing the public to access, understand and appreciate the unique beauty of Far South Coast landscapes.

### **3.2.3 Bushfire impact**

Whilst the bulk of the survey assessments were completed prior to the 2019–20 bushfires, additional surveys were undertaken post-fire in November 2020. These surveys found there to be a mosaic of significant groundcover recovery across the survey area, with early successional flora species appearing. Since the fire, mid-successional species have been observed within Beowa National Park. By the time construction begins (expected to be early 2022 and pending approvals), there will be further groundcover, midstorey and overstorey vegetation recovery throughout the landscape. Native fauna are utilising burnt areas and are now less reliant on unburnt patches.

The draft REF and biodiversity assessment has been updated post-fire to ensure the current site conditions and implications of the fire for species recovery are accounted for in the assessment’s conclusions regarding significance and mitigation recommendations.

Furthermore, since the public exhibition of the draft REF, NPWS has obtained survey results showing the recovery of certain marsupial species since the 2019–20 fires in Beowa National Park. This includes the southern brown bandicoot (*Isoodon obesulus*), which is listed as endangered (*Biodiversity Conservation Act 2016*) in New South Wales. The draft REF and biodiversity assessment will be updated to ensure these findings are incorporated.

### **3.2.4 Bushfire management**

Section 4.2.3 of the draft REF – Operation, states that once the accommodation precincts are established, prescribed burns will be undertaken in newly created strategic fire advantage zones to increase bushfire resilience.

After careful consideration of the potential impacts of establishing such zones on biodiversity, NPWS has decided that the risks outweigh the benefits and, therefore, will remove this requirement from the REF.

## **3.3 Change of park's character**

The Light to Light Walk Upgrade will be sympathetic to local concerns and the environment. While activity may increase in areas of the park, much of the track is already in place. Where new track sections will be built, every effort will be made to retain the character of the landscape and minimise impacts on the environment and cultural heritage.

NPWS has worked closely with the architects on the placement and design of the huts to minimise their visual impact on the landscape. Plantings of endemic species will also be carried out to provide natural screening.

## **3.4 Aboriginal and historic cultural heritage**

Selecting a route that will minimise impacts on Aboriginal cultural and historic heritage values is a key focus for the project. Since the inception of the project, NPWS has undertaken extensive Aboriginal cultural heritage assessments along the length of the proposed route in consultation with the Eden Local Aboriginal Land Council and other Registered Aboriginal Parties.

As a result of the findings of this fieldwork, many of the new sections of track north of Hegartys Bay, proposed in the 2019 *Draft Light to Light Walk Strategy*, will not be constructed, and the route will revert to the existing walking track to avoid harm. The proposed extension to the walk south of Green Cape Lighthouse to Disaster Bay will not be pursued.

An Aboriginal Cultural Heritage Assessment Report (ACHAR) is informing the finalisation of the REF and the decision whether an Aboriginal Heritage Impact Permit (AHIP) is required. NPWS is engaging with the Aboriginal community as part of the requirements in preparing an ACHAR. NTSCORP was consulted as a part of this Aboriginal community engagement.

## **3.5 Visitor experience**

### **3.5.1 Cost**

The hut-to-hut model will provide an alternative for visitors of different ages and abilities to experience the Light to Light Walk. For example, the hut-to-hut model will provide increased opportunity for multi-generational walking groups to experience the Light to Light Walk – with grandparents, parents and children walking together and overnighting in accommodation.

The multi-day walk will be managed by NPWS, and the price point will be determined based on the quality of the packaged accommodation and experiences.

Several different walk itineraries are possible depending on the style of walk and experience walkers are seeking; hut-to-hut or pack camping. These different experiences will range in price and aim to cater for all budgets.

### **3.5.2 Camping access**

The proposed purpose-built, walk-in campgrounds at Mowarry Point and Bittangabee Bay will be established specifically for pack campers and will be discrete, sensitively designed and include toilet facilities. Walk-in campers not undertaking the Light to Light Walk will also be able to book the formalised campground at Mowarry Point. The existing campgrounds at Saltwater Creek and Bittangabee Bay will also be available for people undertaking the Light to Light Walk.

There is enough space available at Mowarry Point for NPWS to co-locate camping and accommodation and maintain the sense of immersion and remoteness for both pack campers and hut-to-hut walkers.

NPWS will not co-locate independent pack camping with accommodation at Hegartys Bay; however, this is due to the area being more constrained by vegetation and topography. Independent pack camping will be relocated from Hegartys Bay to purpose-built, walk-in only sites at Bittangabee Bay.

### **3.5.3 Increased tourism**

Whilst an increase in visitor numbers is expected, NPWS is conscious of the carrying capacity of the coastal environment and has carefully considered it when developing the proposal.

The new hut accommodation will extend the Light to Light walking season by providing shelter from poor weather, winds and cold nights. This will support a greater dispersal of visitors throughout the year and provide an alternative to experience the Light to Light Walk outside of the warmer months.

NPWS will closely monitor the impacts of visitation and put control measures in place if necessary, which will be detailed in the operational management plan, to minimise the impact on the environment, and Aboriginal and historic heritage.

Additional staff will be employed by NPWS to manage the increased number of visitors. This includes hut officers who will stay in purpose-built staff accommodation at Mowarry Point and Hegartys Bay.

### **3.5.4 Kayaking**

NPWS intends to allow camping for sea kayakers along the coastline of Beowa National Park, and therefore access to Mowarry Point.

### **3.5.5 Vehicle access tracks**

As mentioned in Section 3.1.2, other funding has recently been committed to upgrading precincts and fire trails in the region, including Mowarry Point Fire Trail. Works to upgrade Mowarry Point Fire Trail will begin once environmental and Aboriginal cultural heritage planning approvals have been obtained. Other fire trails and public areas in the park, including those at Green Cape, will be upgraded over time as funding becomes available.

The impacts of visitation will be closely monitored and control measures will be put in place, if necessary, to minimise the impact on the environment, and Aboriginal and historic heritage.

### **3.5.6 Noise pollution**

There will be some noise associated with the construction of the hut accommodation and walking trail, however, this noise will be temporary for the duration of the works.

Aircraft operations associated with construction would be undertaken Monday to Friday, avoiding weekends and public holidays whenever possible.

The hut accommodation and amenities have been designed to require minimal maintenance. Therefore, traffic movement and noise generated to and from and around the precincts is expected to be low. NPWS may employ a helicopter approximately 8 times per year to lift wastewater pods from Mowarry Point and Hegarty's Bay.

Appropriate controls for flight paths crossing public tracks and trails will be implemented to ensure no people are below the flight path for aircraft operations.

### **3.5.7 Walking track alignment**

NPWS recognises there are a range of views about the track. However, NPWS is confident that following extensive research and investigation by internal experts and external advisers, including landscape architects and track designers, the proposed alignment is well balanced to provide a better visitor experience whilst minimising the impact on the environment.

NPWS notes that the final design of the walking track remains subject to environmental and cultural heritage approvals.

The proposed route of the Light to Light Walk will continue to provide walkers access to expanses of coastal heath. Furthermore, while a new coastal route south of Pulpit Rock is proposed, the current route through heathland will remain open. Together with the new route, this will create an enjoyable walking loop from Green Cape.

## **3.6 Green Cape Maritime Precinct**

Although not currently being proposed, a project to reconfigure the buildings at Green Cape Lightstation to provide a third nights accommodation for Light to Light walkers may commence if funding becomes available.

Whilst the cumulative impacts of the proposal to reconfigure Green Cape have been assessed in the draft REF for the Light to Light Walk Upgrade, a separate REF would be required for Green Cape which considers proposal-specific surveys, environmental assessments and design plans and considerations.

If the buildings at Green Cape are reconfigured, the capacity to support casual short-stay accommodation will be reduced to support the upgraded walk's new accommodation model. Further planning and ongoing operational analysis would be undertaken to determine how casual bookings would be made available for a short period of a minimum of 4 weeks each year. Potential for additional accommodation outside of the precinct is enabled in the plan of management (as amended in 2021) and may be part of a future project to support casual short-stay accommodation in the vicinity.

The current funding does allow for some minor upgrades to water and wastewater services within the precinct.

## More information

- [Ben Boyd National Park and Bell Bird Creek Nature Reserve Plan of Management](#)
- [DPE Have Your Say](#)
- [Light to Light Walk Public Exhibition Report](#)
- [Light to Light Walk Strategy](#)
- [NSW Have Your Say](#)