



NSW NATIONAL PARKS & WILDLIFE SERVICE

Light to Light Walk Public Exhibition Report

Ben Boyd National Park



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Introduction

The National Parks and Wildlife Service (NPWS) is implementing a visitor infrastructure program which aims to increase nature-based tourism in New South Wales, boost regional visitor economies and improve community wellbeing.

The Light to Light Walk in Ben Boyd National Park is one of nine visitor infrastructure projects across New South Wales. Other projects include the Royal Coast Track, Sydney Harbour Scenic Walk, Snowies Iconic Walk and the Tweed Byron Hinterland Trails.

NPWS has prepared the Draft Light to Light Walk Strategy (the Strategy) to provide direction for developing the Light to Light Walk (the Walk). The Strategy outlines the project scope which includes a realigned track between Boyds Tower and Green Cape Lighthouse and new accommodation to provide a hut-to-hut style experience for walkers.

The management of NSW national parks and reserves is guided by publicly available plans of management. Management activities and other operations in the park must be consistent with the plan of management. Where proposed activities are inconsistent with the plan of management, a new plan must be developed, or the current plan must be amended.

To enable the work proposed in the Strategy, NPWS prepared the Draft Amendment to the Ben Boyd National Park and Bell Bird Creek Nature Reserve Plan of Management – Light to Light Walk Improvements (the Amendment).

This public exhibition report summarises feedback received from the public on the Strategy and the Amendment and outlines the Department's response to submissions.

Much of the southern section of Ben Boyd National Park, including extensive sections of the Light to Light Walk, was impacted by bushfire in December 2019 and January 2020. NPWS manages fire to protect life, property and community assets, maintain and enhance biodiversity values and protect Aboriginal and historic heritage following a statewide strategy (*Living with Fire in NSW National Parks – A strategy for managing bushfires in national parks and reserves 2012-2021*) and reserve fire management strategies, in this case, the Ben Boyd National Park Fire Management Strategy. While all aspects of the Light to Light Walk proposal have considered potential impacts from bushfire, assessment of bushfire risk, and mitigation of that risk, is critical for the proposed new accommodation.

Background

The current plan of management for Ben Boyd National Park was adopted in November 2010 by the then Minister for Climate Change and the Environment. The plan enables accommodation to be built in the park at two points along the Light to Light Walk, Mowarry Point and Bittangabee Bay, and at Green Cape. To date, no accommodation has been built.

Visitation to national parks and reserves on the NSW south coast has increased by almost 30% in the 10 years from 2008. To better manage the increasing number of visitors and cater to demand for high quality walking experiences, NPWS reassessed the proposals contained in the 2010 plan. It was determined that improvements could be made to the Light to Light Walk including reconsidering the location of proposed accommodation and rerouting sections of the existing track. NPWS prepared an initial concept plan and sought and obtained funding through the NSW Government's Regional Growth – Environment and Tourism Fund (RGETF).

The Strategy was prepared to provide direction for NPWS to develop the Light to Light Walk and to provide walkers, park visitors and other interested stakeholders with some detail about the proposal. While the Strategy does provide additional detail, it remains at a

conceptual level. Some work proposed in the Strategy was not consistent with the current plan of management, so an Amendment was prepared.

Consultation process

The Strategy and Amendment were on public exhibition from 12 July 2019 to 26 August 2019.

The Strategy and Amendment were available online and at multiple locations in hard copy. Links to these documents were also emailed to registered, local, regional and statewide stakeholders.

Open house public information sessions were held at Pambula, Eden and Bega during the exhibition period.

Submissions

A total of 205 submissions were received.

A broad range of stakeholders provided feedback, including other NSW Government agencies, local government, non-government organisations (e.g. Aboriginal stakeholders and environmental groups), private individuals and business operators.

The volume of submissions, and their varied sources, confirmed the high level of interest in the proposal.

NPWS consulted its statutory advisory bodies, the South Coast Regional Advisory Committee and the NPWS Advisory Council, on the proposal and the submissions received.

Adoption

The Minister for Energy and Environment reviewed the proposal contained in the exhibited Strategy and Amendment, the submissions received and the advice of NPWS and its statutory advisory bodies before adopting the Amendment.

Reporting

Once the Amendment was adopted, this report, which provides an overview of the key themes raised in submissions and outlines the changes made to the exhibited Strategy and Amendment following the review of the proposal and submissions, was prepared.



Figure 1 Consultation process

Overview of public exhibition responses

NPWS reviewed all submissions. The submissions addressed a wide range of issues that have been summarised in this report under the following six key themes. This discussion covers all major comments and issues raised in submissions but is not intended to be exhaustive.

Camping on the Light to Light Walk

Presently, most independent pack campers on the Light to Light Walk stay at informal camping sites at Mowarry Point and Hegartys Bay. The Amendment and Strategy proposed that accommodation be built at these sites and that independent pack camping be restricted to purpose built walk-in only sites at the existing, vehicle accessible, Saltwater Creek and Bittangabee Bay camping areas.

Many submissions noted that Mowarry Point and Hegartys Bay are popular sites for existing users, especially pack campers and boat users, and opposed the proposal to restrict pack camping to Saltwater Creek and Bittangabee Bay. Overnight walkers expressed clear opposition to being restricted to camping at these vehicle accessible sites.

Many submissions suggested it was unnecessary to exclude pack camping from hut sites and cited numerous examples, both from within Australia and internationally, where independent campsites and hut accommodation have been co-located.

Some submissions noted that the proposal to prohibit camping at Mowarry Point would require independent walkers to walk from Boyds Tower to Saltwater Creek on the first day, an additional four kilometres or so beyond Mowarry Point. Several submitters, including two schools providing Duke of Edinburgh programs and a local Scout group, suggested this was too far, particularly for those starting the walk on arrival after a day's travel and or with heavy first day packs. Some of these submissions raised concerns about walker safety, especially concerning walking in the dark close to cliffs.

New accommodation

The current plan of management for the park enables new accommodation to be built at Mowarry Point, Bittangabee Bay and Green Cape, outside the lightstation complex.

The Amendment proposed new accommodation for Light to Light walkers at Mowarry Point, Hegartys Bay (instead of Bittangabee Bay) and both inside and outside the lightstation complex at Green Cape.

A small number of submissions were supportive of huts being constructed in the park and the mix of accommodation options that would become available for Light to Light walkers. However, many submissions suggested additional accommodation was unnecessary, suggesting ample accommodation is available near the park and that existing tour operators already provide tailored on-park accommodation. Several submissions questioned whether there was sufficient demand for hut accommodation to support the proposal.

Many submissions raised concerns about the potential impact of building and managing huts at Mowarry Point and Hegartys Bay. Impacts of concern included environmental impacts such as vegetation clearance, especially at Hegartys Bay, direct and indirect displacement of wildlife, and social impacts such as the loss of a sense of remoteness and isolation, and the loss of naturalness or a sense of domesticating the park. Submissions also raised concerns about the potential environmental impact of improved access and clearing for fire management purposes.

Many submissions suggested that the proposal to accommodate hut walkers exclusively at Mowarry Point and Hegartys Bay, thereby limiting pack campers to vehicle accessible Saltwater Creek and Bittangabee Bay camping sites, favoured a new user group at the expense of current users, including traditional bushwalkers.

Several submissions suggested that if built, huts should be located at Saltwater Creek and Bittangabee Bay where environmental impacts would be reduced and where access and service options are available.

Commercial activity

Many submissions suggested the proposal to build and operate huts is a commercial operation and suggested that such an operation is not NPWS core business. Many were concerned that building and operating huts would distract and divert NPWS staff and resources from the principal task of managing park values. Some submissions suggested the proposal was purely about revenue raising while others raised concerns about the potential for an unsuccessful venture to have long term resource implications for NPWS. Some 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. There was less contention around commercial operators providing other support services to walkers on park including transfers, guiding and food support.

Some submissions questioned the target market for hut-to-hut walkers noting that the proposal doesn't cater for either hard walkers who want to walk independently, or soft walkers, who want comforts such as hot showers and gourmet food.

The Strategy noted that the proposed upgrade of the Walk may in the future enable an operator to gain accreditation as a Great Walk of Australia, using off-park private accommodation, and that an expression of interest process would be undertaken to select an operator. A variety of concerns were raised in submissions about the Great Walk status. Concerns included increased demand displacing independent walkers, the cost to participants and effective privatisation of the walk by a single commercial Great Walk operator. Other submissions suggested that the walk is already a great walk.

Light to Light walking track

The Amendment and the Strategy propose realigning the Light to Light walking track at several locations to improve views and visitor amenity, and to protect environmental and cultural values. The proposed realignment largely follows the coast. The Amendment and the Strategy also proposed to delete the action enabling investigation and construction of an extension of the Walk from Green Cape to Wonboyn.

Many submissions considered that the proposed focus on a coastal route would reduce the variety of vegetation and habitats experienced by walkers, including limiting opportunities to walk through coastal heath. Some went as far as to say the walk would become boring. Others suggested that the clifftop route would provide less shelter for walkers, especially during inclement weather.

Many submissions were concerned the extent of rerouting proposed would have a greater environmental impact than maintaining or repairing the existing track, with many supportive of a raised boardwalk to protect sensitive vegetation and limit ground disturbance. Some submitters noted some sections of the track may require rerouting to minimise impacts, but that many do not.

Several submissions suggested preserving the current inland trail from Bittangabee Bay to Green Cape, with some suggesting the forested section was one of the most interesting parts of the walk.

Submissions supported the proposal to not pursue an extension of the Light to Light Walk from Green Cape to Wonboyn.

Green Cape accommodation

The current plan of management enables the existing buildings at the Green Cape lightstation complex to be used for accommodation. At present, the keepers' cottages and the telegraph station are used for casual short stay accommodation.

The Strategy outlined that the existing Green Cape buildings would be used to accommodate up to 36 Light to Light walkers on the third night of the walk and that this may result in the lightstation cottages and buildings no longer routinely being available for casual short stay bookings.

There was limited support for the proposal to accommodate Light to Light walkers at Green Cape. However, many submissions suggested the proposed approach was inequitable, taking amenity from one group to benefit another. Many submissions noted that the lightstation accommodation currently provides for elderly people or people with a disability who would now be excluded. Some submissions requested a portion of accommodation at Green Cape be maintained for independent visitors, day walkers and people with a disability.

Many submissions raised concerns about the potential impact on Green Cape heritage values, particularly from refurbishments to accommodate a large number of walkers. Others were concerned about the potential for existing infrastructure, including power, water and sewer, to cope with additional visitation.

Some submissions suggested a better alternative may be to accommodate walkers at a separate facility, located outside, and out of sight from, the lightstation complex. Some suggested this would enable casual short stay accommodation to continue in the lightstation precinct and maximise income generation. Others opposed additional accommodation being provided outside the lightstation precinct.

Several submissions suggested it would be inappropriate to construct new buildings within the lightstation precinct.

A number of submissions suggested that accommodation at Green Cape was unnecessary given its location at the start/end of the walk. Some suggested staying at Green Cape should be optional for Light to Light walkers.

Public vehicle access

The current plan of management enables the closure of inappropriate vehicle tracks formed by unauthorised use of the coastline, particularly those impacting heathland. The current plan made provisions for car parks to be delineated and walking access only provided at several sites including Walkers Rock, Bobs Rock, Spot X and Spot Y.

Similarly, the Amendment and the Strategy proposed to relocate the Pulpit Rock car park, rehabilitate damage and formalise a walking track to the coast.

Most of the proposed access works from the current plan of management have not been implemented and many submissions commented on these existing proposed works.

Regarding the proposed changes at Pulpit Rock, submissions were concerned about where the car park would be relocated, with some suggesting that constructing a new car park would cause unnecessary environmental damage.

Management response

In response to submissions, NPWS and its statutory advisory bodies, considered where changes could be made to revise the proposal, improving outcomes for visitors and for the parks natural and cultural heritage values. Not every argument made, or point raised, in submissions lead to changes. The following discussion describes where changes were made and outlines reasoning where changes were not made.

Camping on the Light to Light Walk

The Strategy aims to broaden the range of visitors able to undertake the Light to Light Walk by providing a hut-to-hut style walk. However, NPWS recognises the Light to Light Walk is already a popular destination for independent pack campers and will work to ensure that both independent pack campers and hut-to-hut walkers can enjoy the walk.

NPWS had proposed new purpose built walk-in only camping sites be constructed at Saltwater Creek and Bittangabee Bay for independent pack campers. NPWS envisaged that these new sites would be located adjacent to, but separate from, the main vehicle accessible sites to provide amenity for independent pack campers while also providing access to existing facilities.

However, in response to widespread sentiment expressed in submissions, NPWS has reconsidered its proposals for independent pack camping. NPWS recognises the community desire to continue to camp away from vehicles along the Light to Light Walk, particularly at Mowarry Point. NPWS will formalise low key walk-in only public camping facilities at Mowarry Point to cater for independent pack campers, boat users, school groups and other general walk in campers. The Mowarry Point site has been cleared previously and much of it remains grassy and open. Development of both the accommodation and low key walk-in only public camping facilities can occur with little or no additional clearing of vegetation.

NPWS will not co-locate independent pack camping with accommodation at Hegartys Bay, however, where the site is 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. A separate group camping area will also be developed at Bittangabee Bay.

Given the new facilities proposed at Mowarry Point, NPWS will no longer construct purpose built walk-in only campsites at Saltwater Creek.

The revised proposal to provide for camping at Mowarry Point rather than Saltwater Creek provides safer access for park users arriving by watercraft. Bittangabee Bay also provides relatively safe access for watercraft users.

New accommodation

A range of existing accommodation options are available for park visitors and Light to Light walkers including off-park accommodation and commercial tour operator supported camping on park. However, NPWS is confident there will be additional demand from hut-to-hut walkers and anticipates that providing huts will complement existing accommodation options. The upgraded walk is expected to increase visitation and drive additional demand for all forms of accommodation.

Construction and management of huts on the Light to Light Walk will have some impact on the values of the park. However, NPWS will continue to undertake environmental and heritage assessments to ensure impacts are minimised. The environmental assessment, called a Review of Environmental Factors, will be publicly exhibited.

Construction of huts and associated facilities is expected to be more complicated at Hegartys Bay than at Mowarry Point where there are large areas of previously cleared land accessible by existing tracks. Assessment and design are continuing for both sites, including assessment of bush fire risk and design to mitigate that risk. If Hegartys Bay proves unviable, NPWS will develop huts at or near Bittangabee Bay instead.

A key component to a successful hut-to-hut walk is that users experience a sense of immersion and remoteness, including a separation from other park activities. Mowarry Point and Hegartys Bay both offer this isolation which is not so readily available at Saltwater Creek and Bittangabee Bay. The hut-to-hut model is not intended to be elitist, but rather provide an alternative for a wider range of visitors 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.

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.

Commercial activity

NPWS considers the proposal is part of its core business of park management. One object of the *National Parks and Wildlife Act 1974* 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 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.

The Strategy noted that NPWS propose to operate the commercial accommodation. However, the current plan of management enabled commercial operation of the proposed accommodation and the exhibited Amendment did not propose to change this. NPWS recognises the concerns expressed with commercial managers operating on-park accommodation and has removed references to commercial operators managing or leasing accommodation and clarified that NPWS will manage all accommodation.

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

There is some potential that in future a provider, registered as a 'Great Walk' operator, could host tours in the park, utilising off-park accommodation. Given commercial activities such as guiding will continue to be permitted, this doesn't need to be addressed in the Amendment, but it remains outlined in the Strategy.

The target market for the Light to Light Walk has been identified through NPWS visitor analysis and market demand analysis for multi-day walks.

Light to Light walking track

Delivering a world-class walk offering remoteness, coastal connection and cultural heritage is one of the key principles of the Strategy.

NPWS recognises there are a range of views about the track alignment and points of interest along the walk. However, NPWS is confident that, following extensive research and investigation by internal experts and external advisors, including landscape architects and track designers, the proposed alignment is well balanced to provide a better visitor experience and protect the environment.

NPWS notes that the final design of the walking track remains subject to detailed planning and design, environmental and cultural heritage assessments, management review and executive approval.

New track construction will minimise environmental impacts and existing tracks no longer required will be closed and rehabilitated. Construction techniques used for the new walking tracks will vary with the requirements of the location but are expected to include some raised boardwalks in sensitive locations.

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 is expected to make an enjoyable walking loop from Green Cape.

Green Cape accommodation

NPWS acknowledges that Green Cape lightstation, being located at the southern end of the walk, is not an essential overnight stay for Light to Light walkers. Nevertheless, the iconic nature of the site means that walker demand for accommodation at this location is expected to be strong. Accommodation within the lightstation complex is considered an important component of the Light to Light hut-to-hut model and is expected to help maximise the potential for success of the proposal.

NPWS will continue to prioritise accommodation in the lightstation buildings for Light to Light walkers. This requires NPWS to establish similar accommodation arrangements at the lightstation as will be available at the two new accommodations sites – Mowarry Point and Hegartys Bay. The lightstation must be able to accommodate up to 36 walkers each night. This is expected to fully occupy the existing buildings at Green Cape and therefore, while the Light to Light Walk is operating, there will be no accommodation available for casual short stays.

NPWS recognises the concerns raised about access to Green Cape accommodation for existing users. Green Cape will be made available for accommodation for casual short stays for some time, yet determined, each year.

NPWS will review demand to optimise visitor experience and the potential for success of the Light to Light Walk. Retaining the option to build new accommodation at Green Cape, either outside or within the lightstation precinct, provides flexibility for NPWS to meet the demand for accommodation from walkers and other casual short stay visitors.

NPWS acknowledges the significance and complexity of the State Heritage-listed site. All works proposed at Green Cape will be assessed for their impact on heritage values and comply with the conservation management plan. Where relevant Heritage Council approval may be required.

Public vehicle access

Managing access to popular fishing and surfing spots is challenging and controlling access to protect sensitive coastal locations can be difficult. Many of the proposed changes to access in the current plan have not been carried out and this has led to confusion around what was or was not a new proposal.

Access work to protect sensitive coastal locations from impacts of vehicles is already allowed under the current plan at Walkers Rock, Bobs Rock, Spot X and Spot Y. Pulpit Rock is the only location where new work is proposed in the Amendment. NPWS proposes to relocate and formalise the Pulpit Rock car park less than 50 metres west of its current location.

NPWS routinely manages the environmental impacts of popular visitor facilities in environmentally sensitive locations. In Ben Boyd National Park, NPWS will limit environmental impacts by setting back car parks from increasingly popular coastal destinations located on erosive and culturally sensitive landscapes and provide short walk-in access for visitors.

Work will be subject to environmental impact assessment and approval. Limiting vehicular access to some sites by constructing or relocating car parks and replacing eroding vehicle trails with walking tracks is expected to have a long term net positive environmental impact.

Next steps

Further detailed planning

The Amendment has been adopted and published on the [Department's website](#).

Detailed design and planning continue to further refine the Strategy. The Strategy must remain consistent with the adopted Amendment.

Assessment process and final Strategy

Before the Strategy is finalised and work commences, NPWS must undertake a comprehensive and detailed environmental and heritage assessment to determine the impact of the proposal. Activities within NPWS reserves are assessed under Part 5 of the *NSW Environmental Planning and Assessment Act 1979*. Approvals under the *Biodiversity Conservation Act 2016*, *Heritage Act 1977* and *National Parks & Wildlife Act 1974* may also be required. The final designs are subject to this assessment and may be refined or changed to reduce environmental impacts.

Work that is undertaken for the project will be in accordance with NSW Government Procurement Policy Framework to ensure an equitable process, that guarantees the best outcomes for the region and community.

Stakeholder liaison

A new Light to Light Walk Stakeholder Reference Group will be established. Membership will reflect a broad range of stakeholders to provide advice on the finalisation of the Light to Light Walk Strategy. The group will be in place until the project is completed.

Local and other stakeholders, including those stakeholders who have registered for project updates will continue to be engaged over the course of the project.

The Review of Environmental Factors will be placed on public exhibition for comment.