



BLUE MOUNTAINS
World Heritage Institute

Submission

**Public consultation for the Greater Blue Mountains Area
National Heritage assessment: additional values and areas**

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1 Where do you live?

Greater Blue Mountains, NSW

- The Blue Mountains World Heritage Institute is located in Acacia St Katoomba

2. Do you identify as a First Nations person?

No

3. Are you a Traditional Owner of the Greater Blue Mountains Area?

No

4 If you would like to, please describe or name the First Nations cultural group/s that you belong to:

N/A

5. Do you think that the additional areas indicated on the Map attachments should be added to the Greater Blue Mountains National Heritage place?

The Blue Mountains World Heritage Institute supports all additional areas proposed by the Department of Climate Change Energy Environment and Water in Consultation attachments, maps A and B.

In the period since world heritage nomination, a greater body of knowledge has emerged that deepens our understanding of the significant value of the cultural, geodiversity and biodiversity values of the Greater Blue Mountains World Heritage site and surrounding areas. These include:

- A deeper understanding of First Nations Peoples' connection to the area and its importance to cultural traditions
- The unique presence of rare geological formations including pagodas, slot canyons, bottleneck valleys, perched lakes, high altitude aeolian dunes, karst systems and the temperate highland peat swamps.
- The spectacular and distinctive landscape that is highly valued by the Australian and international community.

The Blue Mountains World Heritage Institute notes that a number of the proposed additional areas have high connectivity value across the Blue Mountains protected area. Our position is that ecological connectivity is essential for the prevention of catastrophic loss of biodiversity and to maintain, enhance, and restore ecological flows, species movement, and dynamic processes across environments.

The 2020 IUCN World Heritage Outlook report notes the environmental status of the Greater Blue Mountains World Heritage Area has declined from 'good with some concerns' in 2017

to 'significant concern' in 2020¹. The area faces the impact of climate change that results in increased fire risk, increased runoff and water flows resulting in landslides, urban development impacting the local biodiversity and increased invasive species. Given this decline there is a strong argument for recognising the value in protecting areas with high connectivity. The report notes that the impacts of developments adjacent to the site require ongoing vigilance, and the extensive perimeter of the site and the existence of major enclaves (inholdings) create further management challenges.

The Blue Mountains World Heritage Institute notes the importance and opportunity to include Aboriginal Cultural Heritage values inherent in the Greater Blue Mountains Area in this submission.

We recognise the national and international significance of the cultural values across the Greater Blue Mountains area and broadly advocate for their addition to the national heritage list. In 2007 we were commissioned by the Department of Environment and Water Resources to provide an assessment on the Aboriginal Cultural Heritage Values of the Greater Blue Mountains World Heritage Area - a link to that report is [here](#).

We support wide reaching consultation with the various traditional owners connected to the Blue Mountains and adjacent areas to consider heritage status related to First Nations connection to and importance of specific areas and to consider both current connections and intergenerational responsibilities. We advocate for such consultations to be undertaken consistent with the principles in the UN Declaration on the Rights of Indigenous Peoples and that of free, prior and informed consent. To that end, we have not commented on the Indigenous Cultural Heritage Values inherent across the Blue Mountains and adjacent areas in this submission.

We note the proposal recommends the addition of a number of areas that are managed by various land managers, and that being recognised on the national heritage list will have further land management implications. Given that, we suggest that a process is required that involves deep engagement, collaboration and shared planning with the various land managers and formalising an on-going collaborative effort based on shared values and management priorities.

The Blue Mountains World Heritage Institute supports the rationale put forward by the Greater Blue Mountains World Heritage Area Advisory Committee in their report '[Values for a New Generation](#)'² for the additional areas notably:

(Please note the copy provided in italics has been taken directly from the 'Values for a New Generation' report.)

Goulburn River National Park

Criteria: Outstanding value to the nation because of importance to natural history

Goulburn River NP is botanically significant as it forms part of a transitional zone containing a mixture of plants from the south-east, north-west and western parts of the state (NSW National Parks & Wildlife Service 2003). The biodiversity is associated with a number of physiographic factors as well as the low height of the Great Divide.

¹ [Greater Blue Mountains Area | World Heritage Outlook](#)

² <https://bmnature.info/docs/documents/values-for-new-generation.pdf>

The low local relief of the plateau (dissected by valleys that have broad river flats), cliff lines that are generally not as abrupt as they are elsewhere in the Sydney Basin, and surface outcrop contacts between the basalt flow deposits and underlying sedimentary rocks that form more indistinct boundaries than elsewhere, are all important.

Nullo Mountain State Forest - High Importance

Criteria: Outstanding value to the nation because of importance to natural history and Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

Nullo Mountain is the largest basalt flow in the northern Blue Mountains, and Nullo Mountain State Forest (5370 ha in area) covers part of this plateau to the north, and an area of lowland sandstone forest to the south adjoining Dunns Swamp in Wollemi NP.

The northern basalt area includes Eucalyptus laevopinea, Eucalyptus bicostata, Eucalyptus praecox and Eucalyptus viminalis. The Nullo Mountain Flora Reserve was created to protect an unusually large fruited form of Eucalyptus laevopinea (Silver-topped Stringybark). Possibly the largest known population of the listed Vulnerable plant, Derwentia blakelyi is found on the basalt part of the State Forest.

Coricudgy State Forest - High Importance

Criteria: Outstanding value to the nation because of importance to natural history

Coricudgy State Forest (7582 ha in area) provides significant gradient extensions of elevation and high rainfall in a generally low rainfall area. Coricudgy State Forest is an important disjunct high elevation (1254 m) / high rainfall basalt cap adjoining the northwestern side of Greater Blue Mountains WHA (Wollemi NP) Forests of Eucalyptus laevopinea, Eucalyptus bicostata, and Eucalyptus cypellocarpa. Eucalyptus laevopinea and Eucalyptus bicostata are found mainly on isolated high altitude areas.

There are sandstone geodiversity elements included in the Coricudgy SF that indicates its importance for inclusion in the National Heritage listing.

Capertee National Park - High Importance

Criteria: Outstanding value to the nation because of importance to natural history and Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

Capertee National Park provides important dry-end gradient extension with Dry Capertee valley woodland (2839 ha), and some limited connectivity through Mugii Murum-ban SCA. It contains threatened plant species and a high number of significant fauna including the Critically Endangered Regent Honeyeater and a large population of the vulnerable shrub Grevillea obtusiflora subsp. fecunda.

Mugii Murum-Ban State Conservation Area - High Importance

Criteria: Outstanding value to the nation because of importance to natural history and Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

Mugii Murum-ban State Conservation Area is a large dry sandstone area (3650 ha) adjacent to Gardens of Stone NP with extensive dry-end gradient habitats, 340 plant species and the Federally and State listed Endangered Ecological Community Genowlan Point Dwarf Sheoak heathland and the critically endangered shrub Pultenaea sp. Genowlan Point. Also contains a number of rare plants such as

Banksia penicillata, Pseudanthus divaricatissimus, and Acacia asparagoides. Records of the threatened fauna species include Tiger Quoll, Powerful Owl and lossy Black- Cockatoo.

Parr State Conservation Area - High Importance

Criteria: Outstanding value to the nation because of importance to natural history

Taking Yengo NP and Parr SCA together NSW National Parks & Wildlife (2001) consider the drier north-eastern part of the two parks have particular biodiversity significance supporting plant communities with species typical of the Western Slopes of NSW such as ironbarks and cypress pines. The inclusion of Parr SCA will provide additional biodiversity value for estuarine eucalypts and habitat.

Criteria: Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

*There are over 700 plant species recorded for the two parks (Bell et al, 1993), at least 20 plant species are at their limit of their known distribution, and 32 threatened plants have been identified within the two parks (NPWS Wildlife Atlas, Nov. 2000). The two parks protect threatened species such as the Brush-tailed Rock Wallaby *Petrogale penicillata*, which occurs only in very small disjunct populations in NSW and Queensland.*

*A major population of the Regent Honeyeater *Xanthomyza phrygia* a Critically Endangered species under the NSW Threatened Species Conservation Act 1995 and the Commonwealth EPBC Act is centred on the Capertee Valley- Capertee NP / Wollemi and Yengo NPs and Parr SCA.*

Yerranderie State Conservation Area - High Importance

Criteria: Outstanding value to the nation because of importance to natural history and outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

*Yerranderie State Conservation Area has Important connectivity value including foreshores of Lake Burragorang, and cultural and biodiversity values, including a high number of significant fauna and *Acacia clunies-rossiae*, a plant listed as Vulnerable under the NSW Threatened Species Conservation Act 1995.*

Criteria: Outstanding value to the nation because of importance to cultural history.

NSW National Parks recognises the Yerranderie township as retaining much evidence of its history as a mining settlement of the early 20th century through its various remains, sites, mines, architecture and ruins. These, in combination with remnant exotic plantings, road systems and subdivision patterns, bring its early settlement to life for visitors. Yerranderie appears to be the only 20th century mining site to be preserved quasi-intact in all of eastern NSW and is an exceptionally well-preserved archaeological site. The township has been lovingly preserved to reflect its history, but the land itself has not seen much subsequent development due to its isolation. An unusually rich assemblage of mining equipment can still be viewed in the mines, and the township has a varied selection of sites, remains, ruins and buildings.

Burraborang State Conservation Area - High Importance

Criteria: Outstanding value to the nation because of importance to natural history and Outstanding value to the nation because of importance to cultural history.

Burraborang SCA is a large sandstone landscape area (17720 ha) with significant connectivity. Ancient lands of the D'harawal and Gundangarra people, the land became important for European settlers as a coal-mining region and to a lesser extent, a source of lead and silver, from the 1820s to the 1960s. When Sydney's population began rapidly expanding, Warragamba River was dammed to create Lake Burraborang flooding most of the old villages.

Criteria: Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

The Burraborang SCA is home to a high number of significant fauna, including Koalas, Tiger Quolls and the Powerful Owl.

Nattai State Conservation Area - High Importance

Criteria: Outstanding value to the nation because of importance to natural history and Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

Nattai SCA is a sandstone landscape area (3383 ha) in good natural condition with significant connectivity to Greater Blue Mountains WHA (Nattai NP) and a number of significant fauna and flora.

Bargo State Conservation Area - High Importance

Criteria: Outstanding value to the nation because of importance to natural history and Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

*Bargo SCA is another sandstone landscape area (4619 ha) in good condition with significant connectivity to Greater Blue Mountains WHA (with Nattai NP). Biodiversity values include Endangered *Persoonia bargoensis* (only occurs in Wollondilly LGA and a couple in Wingecarribee LGA with much of the population in Bargo and Upper Nepean reserves. There are also Shale capping flora and a number of significant fauna.*

We note the above State Conservation Areas form the Nattai Reserves by NSW National Parks & Wildlife Service (2001). Due to the deeply incised topography, climatic variations and several soil types this area hosts diverse flora with National Significance. The reserves

protect pockets of warm temperate rainforest and for eleven species of rare plants; and provide habitat for nine species of threatened native animals.

*Significant plants have been identified in the area of the reserves including *Acacia clunies-rossiae*, identified as Vulnerable under the NSW Threatened Species Conservation Act 1995 and *Bossiaea oligosperma*. *Eucalyptus benthamii* (Camden white gum) and *Eucalyptus hypostomatica*, have also been recorded from the district and may be protected within the park and state recreation areas. At least 15 threatened or otherwise significant plants have been recorded from the Nattai Reserves System.*

*Nine species of threatened fauna have been recorded from the Nattai Reserves System, including the Green-and-Golden Bell Frog *Litoria aurea*, Powerful Owl *Ninox strenua*, Glossy Black-Cockatoo *Calyptorhynchus lathami*, Brush-tailed Rock Wallaby *Petrogale penicillata*, Tiger Quoll *Dasyurus maculatus*, Long-nosed Potoroo *Potorous tridactylus*, Yellow-bellied Glider *Petaurus australis*, Squirrel Glider *Petaurus nofolcensis* and Koala *Phascolarctos cinereus*.*

Jellore State Forest - High Importance

Criteria: Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

Jellore State Forest is a small area (1409 ha) on the current southern fringe of Greater Blue Mountains WHA contiguous with Nattai NP and Bargo SCA providing important connectivity with Wingecarribee River.

Wombeyan Karst Conservation Reserve - High Importance

Wombeyan Karst Conservation Reserve is a small area (569 ha) on the current southern fringe of Greater Blue Mountains WHA with significant geodiversity and cultural values.

Criteria: Outstanding value to the nation because of importance to natural history

The Caves themselves contain diverse subterranean invertebrate communities and overall can be considered a hotspot for stygobite diversity. Stygobites are obligate aquatic faunas that are highly specialised and have developed a range of adaptations for life underground such as loss of eyes and pigment.

*The woodland areas on limestone include the endemic wattle species *Acacia chalkerii* and restricted limestone mosses. The pseudoscorpion *Sundochernes guanophilus* and the mite *Neotrombidium gracilipes* are endemics restricted in distribution to Fig Tree Cave; both are entirely dependent on guano for food and reproduction.*

Criteria: Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

There are at least 25 subterranean aquatic species found at Wombeyan, of which at least 15 are stygobites, including 10 species of amphipods, many of which are undescribed. The distribution of these amphipods is extremely localised, most occurring within a single chamber within a cave system, and many are local endemics

Hassan's Wall - Medium Importance

Criteria: Outstanding value to the nation because of importance to natural history

*Hassans Walls (245 ha in area) is a relatively isolated sandstone plateau immediately south of Lithgow with heath, woodland and forest on sandstone pagoda outcrops, with southern aspect. Rich flora including many orchid species (Bob Coveny pers comm.) and the rare species *Acacia asparagoides*, *Philotheca obovalis*, *Pseudanthus divaricatissimus* and *Leptospermum blakelyi* (Lollback et al. 2014). There is no direct habitat connection with Greater Blue Mountains WHA.*

The Hassan's Walls lookout, however is the highest scenic lookout in the Blue Mountains offering opportunities to view the Greater Blue Mountains landscape and gain perspective of the area.

Bargo River State Conservation Area - Medium Importance

Criteria: Outstanding value to the nation because of importance to natural history

Bargo River SCA (1970 ha in area) in the upper catchment of Bargo River has limited connectivity with Bargo SRA to the west. However this connection is important as the Park is an integral part of the Bargo Linkage, one of the most important fauna habitat corridors in the Greater Southern Sydney Region (DECC 2007).

It facilitates the movement of migratory and nomadic fauna species between these plateaus, but it also connects populations of a number of species that use sandstone habitats. The corridor is important for gene flow of fauna species that are sparsely distributed across the landscape, for re-population of areas when local extinction of a species occurs and for seasonal movements of wide ranging species.

Criteria: Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

Bargo River SCA contains a range of plant communities within a small geographical area, supporting a diversity of flora and fauna, including threatened species (NSW National Parks & Wildlife Service 2013).

*There are two Endangered Ecological Communities, namely Shale/Sandstone Transition Forest and Southern Highlands Shale Woodlands. Threatened plant species include the small-flower grevillea (*Grevillea parviflora* subsp. *parviflora*), hairy geebung (*Persoonia hirsuta*) and Mittagong geebung (*Persoonia glaucescens*).*

*A number of other threatened and regionally significant plant species are known from the vicinity. Four species of threatened fauna have been recorded: the Gang-gang cockatoo (*Callocephalon fimbriatum*), Scarlet Robin (*Petroica boodang*), Sooty Owl (*Tyto tenebricosa*) and the Koala (*Phascolarctos cinereus*).*

Part of Kanangra-Boyd National Park

Criteria: Outstanding value to the nation because of importance to natural history

The Kanangra Walls (Kanimblan) unconformity is the most impressive, and one of the best examples in Australia. This site is a classical locality, and one of the best examples of such an angular unconformity in Australia. Indeed, Kanangra-Boyd NP contains geological structures and rock types which demonstrate the tectonic evolution of Australia during the Palaeozoic era (NPWS, 2001)

6. Please explain if you think some additional areas should be added to the listing:

Please note as in the previous section the Blue Mountains World Heritage Institute supports the rationale put forward by the Greater Blue Mountains World Heritage Area Advisory Committee in their report '*Values for a New Generation*' for the additional areas notably³:

(Please note the copy provided in italics has been taken directly from the '*Values for a New Generation*' report.)

Mares Forest National Park - High Importance

Criteria: Outstanding value to the nation because of importance to natural history

Mares Forest National Park is a small area (2599 ha) adjoining Blue Mountains NP and Wombeyan Caves KCR. It includes important dry country gradient extensions; Guineacor Creek drains to Wollondilly River.

NSW National Park and Wildlife note Mares Forest National Park protects important habitat for threatened animals and plants as well as providing vital linkage of wilderness areas in the Burragorang Valley to the Tarlo River corridor. The park contributes to the protection of Wombeyan Caves and its associated cave fauna.

Threatened species in Mares Forest National Park listed by National Parks and Wildlife include: the vulnerable powerful owl (*Ninox strenua*), varied sittella (*Daphoenositta chrysoptera*), scarlet robin (*Petroica boodang*), flame robin (*Petroica phoenicea*), eastern false pipistrelle (*Falsistrellus* Page 3 Statement of Management Intent: Mares Forest National Park tasmaniensis), eastern bentwing-bat (*Miniopterus schreibersii oceanensis*) and greater broad-nosed bat (*Scoteanax rueppellii*). Local landholders have also reported sightings of the vulnerable spotted-tailed quoll (*Dasyurus maculatus*) and koala (*Phascolarctos cinereus*).⁴

Joadja Nature Reserve and Wollondilly River Nature Reserve - High Importance

Criteria: Outstanding value to the nation because of importance to natural history

These reserves are a part of a major habitat corridor of naturally vegetated lands stretching from Morton National Park in the south, to Nattai and Blue Mountains National Parks in the north. Maintenance of natural vegetation on private lands within the corridor is vital to maintaining the value of these lands.

³ <https://bmnature.info/docs/documents/values-for-new-generation.pdf>

⁴

<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Parks-statement-of-management-intent/mares-forest-national-park-statement-of-management-intent-140191.pdf>

Criteria: Outstanding value to the nation because of importance to cultural history.

Joadja Nature Reserve is host to significant cultural values and important connectivity with Wingecarribee River.

Criteria: Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

The Yellow Box Forest / Woodland here is a part of the complex of communities in the White Box - Yellow Box - Blakely's Red Gum Woodland community, an Endangered Ecological Community under the NSW TSC Act and a Critically Endangered Ecological Community under the Commonwealth EP&BC Act. Much of this community has been cleared across the State and it is poorly represented within conservation reserves.

Also important are areas of mature Grey Gum - Stringybark forest, as Grey Gum is not well represented in conservation reserves and is a food species for some significant arboreal mammals. Six plant species and 16 fauna species listed under the NSW TSC Act have been recorded within the planning area which also has a high diversity of birds for a relatively small reserve area (DEC 2004, Mills & Associates 2002b).

This includes eight bird species listed as threatened under the NSW TSC Act. Many of the species present are uncommon within the South Eastern Highlands Bioregion. The high diversity in bird species is most likely due to the overlap between the South Eastern Highlands Bioregion and the Sydney Basin Bioregion.

Newnes State Forest, Wolgan State Forest, Ben Bullen State Forests (Gardens of Stone) - High Importance

Criteria: Outstanding value to the nation because of importance to natural history

The area includes an extensive outcrop of the Burrell Formation; most of the typical groundwater dependent swamps are located on or just below the 1100m contour, and it is likely that the 1100 m zone relates more or less to the perched unconfined aquifer supplying water to the main groundwater dependent swamps, particularly those in the Carne, Wolgan, Bungleboori, Budgery and Rocky Creek catchments.

As well as the swamp systems, the Newnes Plateau has particular geodiversity features that add to its scientific values. Below the swamps there are the geologically distinctive and unique sandstone pagoda formations (generally occupying the 800–1050 elevation zone), where the platy pagodas are of international geodiversity significance (Washington & Wray 2011). As well, the relict sand dunes described by Hesse et al (2003) provide a strong indication of climatic conditions at the height of the Last Glacial Maximum (c. 20 000 years ago).

Chapter 2 of 'Values for a New Generation' provides further evidence of the biodiversity of this region and the rare and endangered species within this area.

Criteria: Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

This is a very important area of high level sandstone plateau with many restricted plant species (see Table 2) and Federally and State listed Endangered Ecological Communities (e.g. Newnes Plateau Shrub Swamps) not adequately represented in Greater Blue Mountains WHA.

The Endangered Ecological Community Newnes Plateau Shrub Swamps, mainly confined to Newnes SF, is a closely related group of swamps with extensive areas of gently sloping peatlands with subsurface topography determining local peat depth. This association makes them highly susceptible to threats of loss of groundwater, the major one being the impact of subsidence caused by longwall mining; though other impacts may come from changes to hydrology as a result of damming, mine waste water discharge, increased moisture competition from pine plantations, and climate change (Benson & Baird 2012).

Putty State Forest and Adjacent Freehold land

Criteria: Outstanding value to the nation because of importance to natural history and Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

Putty State Forest (22252 ha in area) is a significant natural area bordering Wollemi NP. While the State Forest area has been logged it has substantial areas of native eucalypt forest and woodland vegetation and is the most significant inholding of land within the Greater Blue Mountains WHA.

A large proportion of private land has native vegetation on it, provides habitat for threatened species and significantly contributes to maintaining the values of the surrounding national parks.

There is a case for identifying all private land with natural vegetation within the "Putty Hole" as a buffer area with contributing values to the heritage values of the national parks (Martin Fallding pers. comm. 2014).

Further potential activity on this private land may have detrimental impacts on the adjacent World Heritage Area.

Gospers Mountain Inholding - High Importance

Criteria: Outstanding value to the nation because of importance to natural history and Outstanding value to the nation because of its possession of uncommon, rare or endangered aspects of Australia's natural or cultural history

Gospers Mountain is a significant inholding (74 ha in area) in centre of the WHA, with high connectivity on all sides to Wollemi NP. Mostly cleared. 835 m elevation.

As noted by the Blue Mountains Conservation Society, further consideration should be given to

- Wiarborough Nature Reserve
- Comleroy State Forest and associated flora reserve
- Koolewong Flora Reserve in McPherson State Forest

- Wollemi River State Conservation Area
- Yango River State Conservation Area
- Bargo River State Conservation Area
- Goulburn River State Conservation Area
- Crown lands between Medlow Bath to Hassan's Wall

7. Do you think additional National Heritage values should be added to the Greater Blue Mountains Area National Heritage listing?

The Blue Mountains World Heritage Institute supports the nomination for additional National Heritage values to be added to the Greater Blue Mountains Area National Heritage listing.

Of high importance is the need to recognise the Aboriginal Cultural Heritage Values of the Greater Blue Mountains World Heritage and adjacent areas. We strongly support the Department of Climate Change, Energy, Environment and Water's intention to undertake wide reaching consultation with the various traditional owners connected to the Blue Mountains and adjacent areas. As previously mentioned we advocate for such consultations to be undertaken consistent with the principles in the UN Declaration on the Rights of Indigenous Peoples and that of free, prior and informed consent.

Further, we recognise that The Greater Blue Mountains WHA and associated complementary areas have:

- Geodiversity and Geoheritage significance.
- Historic values associated with events and processes.
- Significant aesthetics valued by national and international visitors.

8. Please explain in as much detail as possible, what you think the National Heritage values of the Greater Blue Mountains Area are:

The Blue Mountains World Heritage Institute supports the rationale put forward by the Greater Blue Mountains World Heritage Area Advisory Committee in their report '*Values for a New Generation*' for the additional values notably⁵:

(Please note the copy provided in italics has been taken directly from the '*Values for a New Generation*' report.)

Geodiversity

The Greater Blue Mountains straddles two distinct geologic zones. First is the highly deformed flysch, limestones and volcanic and volcanoclastic sediments of the Ordovician to Late Carboniferous Lachlan Fold Belt. Second are the overlying sandstones and other sediments of the Permo-Triassic Sydney Basin, and the basalt flows that erupted across part of the area in the late mid-Tertiary. : Few such depositional sequences exist in Australia.

⁵ <https://bmnature.info/docs/documents/values-for-new-generation.pdf>

Yeates (2001) noted that This basin has tectonic significance as part of a “foreland” basin in eastern Australia, i.e. one formed between a stable area (Lachlan Fold Belt to the west) and a tectonically active area (New England Orogen to the east) (Korsch and Totterdell, 1995). In contrast, most Australian Permian – Triassic basins are epicratonic, i.e. deposited entirely on more stable crust (Yeates and Mulholland, 1991).

The Permo-Triassic Sedimentary Sequence

The Sydney Basin is composed of gently-dipping, largely undeformed, Permian to Triassic sedimentary rocks (Pickett and Alder, 1997) which unconformably overlie the older, often highly folded, pre-Permian rocks of the Lachlan Fold Belt. The predominating sandstone represents deposition from major rivers initially from the New England region (Caley and Narrabeen sediments) and later, when the basin tilted to the north, from the south, southwest and west (Geological Survey, 2013).

The Permian Coal Measures

Coal deposits in the Sydney Basin sedimentary sequence, are found from the Hunter Valley in the north, to Bundanoon south of Sydney and found in extensive regional swamps. The extent of coal found in the underlying sandstone areas of the Greater Blue Mountains is unique to this area.

Oil bearing shale

Layers of oil-bearing shale occur within the Permian Coal Measures. This shale has some of the richest kerogen levels of any torbanite in the world (Hutton, 1987)

Joadja Nature Reserve near Mittagong is adjacent to the World Heritage Area and recommended for inclusion. Its ridge tops and upper slopes are Hawkesbury Sandstone, underlain by softer units of the Illawarra Coal Measures and Berry Siltstone exposed on the slopes. The lower slopes and valley floors consist of Silurian and Ordovician slate, phyllite and quartzite (Mills & Associates, 2002a).

Chain of Basalt Caps and Flows_

A number of remnant Tertiary basaltic caps (inselbergs) are found on high points in the Greater Blue Mountains. These remnant basalt caps include the northern high point (1254 m) of Mt Coricudgy, large flows such as Nullo Mountain, striking caps such as Mount Banks, Mount Hay and Mount Yengo, and the unusual basalt inselberg of Mt Colong, which overlies the Lachlan Fold Belt. Geochemical data show that most of the basalt (excluding Jurassic diatremes) erupted 15-20 million years ago (Van der Beek et al, 2001).

Basalt weathers to high nutrient soils, supporting rich plant communities such as rainforest, which contrasts with the dry sclerophyll woodland of the surrounding sandstone (Pickett and Alder, 1997).

The geomorphology of the area is largely determined by erosion resistant volcanic deposits and the differential rates of erosion on the underlying sedimentary strata. The history of erosion and deposition cycles has resulted in an interesting variety of valley and landform characteristics as the sandstone plateau has been dissected by a complex pattern of creeks

flowing within a spectacular valley with sheer cliffs flanking a flat sandy riverbed (NPWS, 2003). Landforms and gorges are more gentle than most of Wollemi NP to the south. Goulburn River National Park's inclusion in the World Heritage Area would extend the representation of sandstone and volcanic landforms at lower elevations and drier climatic conditions. Relatively few Australian sandstone areas have this association of datable basalt flows over the pre-basaltic land surface (Wray, 2013).

The Greater Blue Mountains is highly significant for its very slow rates of erosion and landscape change, considerably slower than seen in most parts of the world.

Lapstone Structural Complex

The Lapstone Structural Complex is an important feature controlling the development of the modern landscape. Much of the Greater Blue Mountains sandstone landscape would have been quite different had the Complex not formed. The Complex (disregarding the Sydney Basin itself) is the major tectonic feature of the Sydney region. We are unaware of any local, non-regional folding or tectonic feature of comparable importance in other Australian sandstone areas.

Extensive Valley Land Forms and Waterfalls

The largest and deepest valleys in the region include the Burrangorang, Megalong, Jamison, Grose, Wolgan, Capertee and Colo Valleys. Unusually for a 'mountain' area, here you don't look up at the peaks, but rather you look down from the plateau into the valleys (Washington, 2013).

The Blue Mountains lies in a moist temperate area, with many waterfalls that flow year-round draining the sandstone plateau. Views of these falls are generally from the top.

Karst Landscapes

The Greater Blue Mountains Area is home to the Wombeyan and Jenolan Karst landscapes. The age span of karst and cave development in the area is significant, and the range of geomorphic processes is without equal in Australia.

The Jenolan karst and its caves have been referred to extensively in the karst literature (see Osborne, 2013; James, 2013). Hundreds of caves have developed in a body of Silurian limestone approximately 250 m wide x 6 km long. It is the most significant impounded karst in the Eastern Highlands of Australia, and is the most important of the 18 impounded NSW karsts that intersect palaeokarst deposits (Osborne, 2013).

The Wombeyan Caves karst is internationally significant for containing over 500 documented caves in the 6 square km area of marble. Its surface includes a diversity of karst features including karren (small solution pits, grooves and runnels), weathered rock comprised of coarse grained marble, natural arches, blind valleys, collapse dolines and an outstanding example of a canyon developed in marble.

Chapter 1 of Values for a new Generation lays out specific features of both Karst systems for their national and international significance.

Yerranderie Volcano and Bindook Complex

The Yerranderie volcano in the Southern Blue Mountains is a rare example of a large (around 40km²) Devonian volcanic caldera now being revealed by the erosion of overlying Late Devonian Lambie Group cover (Schön, 1984). The crater was around 4 km in diameter (Fergusson, 1980). It is of international significance due to its rarity.

Sandstone Landforms. Platy Pagods. Slot Canyons and Bottleneck Valleys

Platy pagodas are the dissected, stepped sandstone towers that form around the cliff edges of many of the sandstone plateaus and are a very important geomorphic and geoheritage feature of the Greater Blue Mountains (Wilkinson et al, 2005; Washington and Wray, 2011).

These complex, intricate, ruin-like landforms are locally known as 'pagodas', and often resemble aesthetically beautiful 'lost cities' and 'temples' (Washington, 2013). They are poorly studied, but because they are unusual both in Australia and internationally, they hold important geoheritage significance.

Platy pagodas are influenced by numerous layers of ironstone (the sandstone re-cemented and hardened by iron-based minerals), and are distinct and significant features, with no other rock formations in Australia or elsewhere mimicking their geomorphology (see Young, Wray and Young, 2009; Washington and Wray, 2011).

Recognising the composition, weathering and erosion resistance, degree of weathering, topographic setting and degree of fracturing, etc is unique to any Pagoda system, the smooth pagodas of Greater Blue Mountains are distinctive in their own right.

*A very important geomorphic and geoheritage feature of the Greater Blue Mountains are the very large number of narrow and deep slot canyons cut by streams into the soft Narrabeen (mostly Banks Wall and Burra-Moko Head) sandstones of parts of the Blue Mountains, Wollemi and Gardens of Stone areas (Holland, 1973). These slot canyons, with their protected, cool, damp and dark habitats, sustain important ecosystems. They constitute refugia for many species of plants and animals, including the unique Wollemi Pine (*Wollemia nobilis*) which is found in only one canyon system within the Greater Blue Mountains. The Greater Blue Mountains has by far the most extensive and well developed sandstone canyon systems in eastern Australia; it is most probable that these systems are amongst the foremost in the world, but bedrock canyons in general are not well studied worldwide, (see Wohl, 1993; Wohl, 1998).*

Some of the cliff-rimmed valleys in the Greater Blue Mountains, such as the Grose, Capertee, Wolgan, Kanimbla and Wollondilly valleys, are widest in their upper reach, yet downstream the cliff walls converge to narrow gorges; all material eroded from the upper valleys has been transported through these narrow gorges or bottlenecks. The landform termed Bottleneck valleys are wide and open in their upper reaches, but have narrow gorge-like constrictions further down for quite a distance.

Bottleneck canyons are another important consequence of the Lapstone Structural Complex. Wray (2013) knows of no other examples of bottleneck valleys in Australia. In the Greater Blue Mountains 'bottleneck valleys' developed because the tributary rivers in their upper reaches have cut down and laterally through the Narrabeen sandstones and softer underlying rocks, creating broad, mature valleys between sandstone cliffs, that are kept

steep by undercutting and rock-falls. Bottleneck canyons are another important consequence of the Lapstone Structural Complex. Wray (2013) knows of no other examples of bottleneck valleys in Australia.

Highland Peat Swamps

*The extensive highland peat swamps of Newnes Plateau are of great significance for both geodiversity and biodiversity. They are highly valuable carbon sinks providing micro habitat diversity and genetic diversity and are listed as a **vulnerable ecological community** under the NSW Threatened Species Conservation Act.⁶*

Jurassic Diatremes

A small number of diatremes have been mapped in the eastern part of the Blue Mountains near Springwood, and a larger concentration in northwest Wollemi NP near Mt. Coricudgy. Two of the few diatremes with natural exposures of breccias are 'Euroka Clearing' near Glenbrook and 'Lost World' crater in Wollemi NP, both in the Greater Blue Mountains WHA.

Apart from their mode of formation, the diatremes are important as a source of xenoliths and megacrysts (discrete crystals or crystal fragments 0.5 cm or more across) which provide information on the composition of the mantle.

We consider the Sydney Basin Jurassic Diatremes are of national significance, and in conjunction with the broader work on the mantle composition and properties, may also have international significance. We are not aware of extensive areas of Jurassic diatremes elsewhere in Australia.

Long Cliff Lines

The most visually striking landforms of the Greater Blue Mountains are the many hundreds of kilometres of sandstone cliff-lines that fringe the plateaus. These extensive cliff-lines are of national significance. These can range in height from tens of metres, to over 300 m near Glen Davis in the Capertee gorge.

Associated geomorphic features of interest include the gorges themselves, the sandstone landforms formed by erosion with joint control (e.g. The Three Sisters), vertical cliff faces (e.g. Dogface Rockfall), waterfalls (e.g. Wentworth, Leura and Katoomba Falls), and slope retreat due to collapse of vertically-jointed cliff wall sandstones (e.g. Narrow Neck Plateau) (Langford-Smith, 1976; Pickett and Alder, 1997).

The Greater Blue Mountains WHA also contains numerous examples of extensive sandstone overhangs including the Wind-eroded Cave (Blackheath), Walls Cave (Blackheath), Kings Cave (Linden), Lyrebird Dell (Leura) and Blackfellows Hand (Newnes Plateau).

The unique value of these cliffs include

- The continuous length of the cliff system*
- Consistent and impressive height*

⁶ <https://www.bmwhi.org/news/2021/5/9/media-release-fears-for-iconic-bullaburra-swamp>

- Limited modern collapse
- The plateaus have been dissected by numerous river systems, flowing both east and west.
- The Blue Mountains is virtually the only place in Australia where primary access to the cliff lines is from the plateau above the cliffs.
- The Three Sisters at Katoomba is part of the cliff line system that deserves special noting. It provides an excellent example of where erosion has followed vertical joints (weaknesses) in the rock leaving the characteristic pillar-like structures.

Cut Rock Kurrajong Fault

At Cut Rock, the Kurrajong Fault is a fracture, which has displaced the Middle Triassic Hawkesbury Sandstone against the Middle Triassic Ashfield Shale of the Wianamatta Group. The fault is in the hinge zone of the monoclinial Lapstone structural complex, a tectonic landform of probable Early Tertiary age (Branagan, 1969; Langford-Smith, 1976). There would thus seem to be few sites comparable that show major faulting and have considerable potential as a teaching site.

Thirlmere Lakes

Thirlmere Lakes near Picton are a series of unusual freshwater lakes associated with a sinuous former river valley incised in the Hawkesbury Sandstone. They are unique in terms of their geomorphology and sedimentation history (Vorst, 1974; Pells, 2011). The probability that the Lakes are 15 million years old makes them a natural laboratory of considerable scientific importance (NPWS, 1997; Pells, 2011).

Shrub Swamps

The Newnes Plateau Shrub Swamps formed during the end of the last glacial period around 10,000 years ago, and cover less than 650 ha (Hensen, 2010; Benson and Baird, 2012). They often have deep peat beds and provide a steady flow of water to streams in the Greater Blue Mountains WHA. They have been recognised as an Endangered Ecological Community 'Temperate Highland Peat Swamps on Sandstone' (THPSS) (under the Federal EPBC Act) and an Endangered Ecological community Newnes Plateau Shrub Swamps under the NSW TSC Act (NPWS, 2005).

The Newnes Plateau Shrub Swamps are an uncommon geodiversity feature and are highly significant for geodiversity and geoheritage at the national level.. They form part of the Temperate Highland Peat Swamps on Sandstone (THPSS), a nationally Endangered Ecological Community with a total remaining area of only 3,000 Ha (DEH, 2005). The Newnes Plateau Shrub Swamps include excellent examples of some of the extensive (in area), well- preserved swamps remaining.

Aeolian Dunes

High altitude aeolian sand sheets and dunes hundreds of metres long and 3 to 6 m high occur at several locations on the Newnes Plateau. These dunes are in fact the only known high altitude example in Australia of aeolian deposits formed in the last Ice Age. They

therefore constitute an important indicator of the last Ice Age periglacial climate in the region. Because there are no other known high-altitude aeolian sand dunes formed on sandstone plateaus during the last Ice Age in Australia a meaningful comparison is not possible.

Lagoon Alluvial Swamps

The Mellong Swamps along the Putty Road north of Windsor, are a significant area of Quaternary deep alluvial sand and clay plains dissected by sandstone ridges. The Mellong swamps support a unique assemblage of plants and ecological communities and is of both geomorphological and botanical interest. The swamps are important for the conservation of reptiles and invertebrates (NPWS, 2002). Mellong are the only extensive highland swamps that the Blue Mountains World Heritage Advisory Council are aware of in Australia that are found on sandstone plateaus and are formed by reversal of drainage caused by uplift along a fault-line. As such they are of national geodiversity significance.

Historic values associated with events and processes.

As outlined by the The Greater Blue Mountains World Heritage Advisory Committee in 'Values for a new generation', The Greater Blue Mountains region is a place of outstanding Australian national heritage value and a unique repository that spans early convict and pastoral history, economic and technological growth, tourism, wilderness and political movements, science, culture and creativity.

The Blue Mountains World Heritage Institute supports the rationale outlined in 'Values for a new generation', notably⁷:

(Please note the copy provided in italics has been taken directly from the 'Values for a New Generation' report.)

European Crossing of the Mountains

The Blue Mountains became a crucial site in the understanding of Australian history, the Australian people, and in the development of Australia's key national legends. By the late nineteenth century, the first successful European crossing of the Blue Mountains was widely recognized as an iconic moment in Australian history. In early nationalist narratives, talented nineteenth century poets such as Henry Kendall and Banjo Paterson immortalised the European mountain crossing as 'opening a path' for future colonisation.

Even as early as 1823, these Blue Mountains went beyond Britain and Europe to stake out a New World claim that moved beyond convictism, and portrayed Australia as a special site of freedom for the working class man.

The easy access of the Blue Mountains to the city-based poets, artists and writers of Sydney's bohemian circles was another factor that enabled this region to become entrenched as a place of powerful resonance in an evolving national historical imagination (Davison 1978).

In his renowned study, The Australian Legend, Russell Ward cast the Blue Mountains in a leading role in 'the bush legend' and its aftermath. Rather than families, his radical legend featured the white working-class male rather than family enterprises. Significantly, Ward saw

⁷ <https://bmnature.info/docs/documents/values-for-new-generation.pdf>

the crossing of the Blue Mountains as having 'foreshadowed the end of New South Wales as a predominantly convict colony' (Ward 1958, p. 66).

The 'discovery' of routes to pastoral lands signified a moment of colonial expansion beyond the coast and beyond the Sydney river system. Beyond the convict areas, it promised areas for free immigrant colonisation. Their journey ensured the expansion of the colony and fed into colonialism's ideal of discovering great vistas of supposedly free land for colonial profit.

Mining

An area rich in mineral deposits and with close proximity to the the early settlement many sites across the Greater Blue Mountains area were mined to support industrial progress of the greater Sydney region. Specific examples as noted by the Greater Blue Mountains World Heritage Advisory Committee include:

The Sydney Basin sedimentary sequence in the Greater Blue Mountains is of significant cultural value due to the economic values of the sandstone, as a construction material in the early settlement.

Coal resources have been of great economic importance to areas around the margins of the Blue Mountains; at Katoomba; north from Lithgow along the western escarpment; and in the Hunter Valley. The coal has played an important role in the development of the Sydney region for more than 100 years, and underpinned the development of Lithgow (the first 'steel city), Newcastle and Wollongong.

During the late 19th and early 20th centuries oil was mined at places such as Newnes in the Wolgan Valley and nearby Glen Davis in the Capertee Valley. Extensive industrial developments at Newnes included a steep railway down into the narrow valley. Mt Airly in the Capertee valley was the site of another early major oil-shale mine; there are major historical ruins on its eastern side and is on the State Heritage Register for its historical value. Mt Airly and Genowlan Mountain are two prominent mesas, now part of Muggii Murum-ban State Conservation Area.

Joadja was a major oil shale mine site from 1870–1911 (similar to Glen Davis). Joadja Nature Reserve has a strong historical link with the former Joadja shale mining area (Knapman, 1988). Some of the mines extended under the reserve. The Joadja Ridge Trail was the first route used to transport shale oil from Joadja to Mittagong, and by early settlers to access nearby High Range and Wangenderry. The scale of the development of oil shale mining at Newnes and Glen Davis, as well as Airly and Joadja, eclipses that found historically elsewhere in Australia.

Archaeological evidence shows that waterfalls in the Blue Mountains area have been important meeting places for local inhabitants for thousands of years.

The Yerranderie and the Bindook complex was a significant mining site from from 1898 to 1928 (NPWS, 2010), the area being mined for its deposits of silver, lead and gold.

Engineering Feats

Until the construction of the railway in the 1860s, the movement of Europeans across the mountains was limited. The 'Fish' train began its service from Sydney to the Blue Mountains in 1866; Katoomba railway platform opened in 1874; by 1868 the famous 'Zig Zag Railway' was under construction. With its series of viaducts and tunnels bringing the line from the top

of the sandstone plateau at Clarence down into the Lithgow Valley, it was considered a great feat of railway engineering.

The Bleichert Ropeway was the first of its kind and made the job of removing oil shale from the vast Jamison Valley a much easier task. Numerous artefacts and evidence of this Ropeway still exist in situ and therefore should be documented and conserved to ensure this important part of NSW's social, economic and technological history is not lost. A survey on the Bleichert Ropeway was produced by the Institute in 2014 and is available [here](#).

Aesthetic Characteristics

The Blue Mountains World Heritage Institute supports the Greater Blue Mountains World Heritage Advisory Committee's recommendation that the scenic grandeur has outstanding heritage value.

The Blue Mountains is a special place of ancient landscapes, towering golden hued stone escarpments, crashing waterfalls and magnificent eucalypts all set among inspiring panoramas that will take your breath away⁸. Each year it is estimated that the Blue Mountains area attracts 4.4 million visitors to experience what the area has to offer.

There is an enormous value in Blue Mountains social-physical identity, and sense of place and well-being particularly for those who live in and are regular visitors to the area. The Blue Mountains create identity for many Sydneysiders as the backdrop to their lives.

We support the rationale put forward by the Greater Blue Mountains World Heritage Area Advisory Committee in their report 'Values for a New Generation' for the additional aesthetic values notably⁹:

(Please note the copy provided in italics has been taken directly from the 'Values for a New Generation' report.)

The place has outstanding heritage value to the nation because of the place's importance in exhibiting particular aesthetic characteristics valued by a community or cultural group.

The regions large, scenic valleys, rock formations and lost cities, surrounded by many kilometres of impressive, vertical, sandstone cliffs has over the years attracted pioneers, surveyors, poets, visual artists, and remains a major tourist eco-destination.

Three Sisters

In 2001 Yeates noted: The Three Sisters is one of Australia's best-known and regularly visited landmarks. The site also exposes a portion of the foreland Sydney Basin sequence. Cochrane and Joyce (1986) considered the site to be one of national significance on the basis of its geomorphic and historical significance.

⁸

<https://www.bmcc.nsw.gov.au/sites/default/files/docs/Blue%20Mountains%20Remplan%20Tourism%20Profile%202021.PDF>

⁹ <https://bmnature.info/docs/documents/values-for-new-generation.pdf>

Jenolan Caves

Australia's earliest tourist industry developed in the Blue Mountains at Jenolan Caves, now part of the Greater Blue Mountains World Heritage Area, attracting more than 250,000 visitors a year is Australia's most-visited and best-known karst area.

Resorts

By the 1880s, the Blue Mountains had become a popular health and recreation area for wealthy Sydney people, particularly in the summer months. The most famous health resort was the Hydro-Majestic in Medlow Bath, which opened in 1904. It became an important venue for social life over the decades, including large dances and parties.

Mountain Tourism

By the 1890s, the local Blue Mountains community had responded to the growing tourist industry by making the beauty of the mountains more accessible to the general public. They cleared tracks and built lookouts. Isaac Barrow at the NSW Dept of Lands prepared the first tourist map of the Katoomba area (Fox 2015). With Jenolan Caves the first viewing cave to be lit by electricity, attractions were there for all to see and marvel (Burke 1988, p. 106).

In the early twentieth century, tourists included more middle class relative to elite visitors. Young men could buy a cheap fare to the mountains and camp under the stars (Burke 1988, p. 99). By 1917, there were sixty boarding houses in Katoomba and the price of a week's stay in a Blue Mountains boarding house had come more affordable (Burke 1988 p. 109).

Aesthetic appreciation of the Blue Mountains is a big theme of visitor engagement. The ruggedness of the landscape and poor soils had impeded agricultural and pastoral development, yet it preserved a rich natural heritage. Early artists depicted this as a landscape of the sublime (Horne 2005).

The Scenic Railway was created in 1957 out of shale-mining equipment and was called 'the world's steepest' railway (Thomas 2004, p. 151).

Bushwalking and Conservation

As the Blue Mountains became a popular place of recreation, an appreciation of the value of its natural beauty and a desire to conserve it, grew. The health retreat movement had established the first walking tracks in the Blue Mountains in the 1870s and when the railway was completed, the number of walking tracks increased dramatically. These walking tracks spread to link public recreation reserves and parks. The agencies responsible for the creation of the tracks included trustees of the reserves, community associations, hoteliers and local authorities. Jenolan Caves was gazetted as a public recreation reserve in 1866.

In 1880, hundreds of concerned citizens petitioned the government to set aside Katoomba Falls as a reserve for the sake of the health, morale and intellectual advancement of the people of NSW (Australian Heritage Database, 2013). The string of scenic reserves known as the Blue Mountains Sights reserves was consolidated in 1917, passed into the control of the Blue Mountains City Council in 1947 and eventually incorporated into the Blue Mountains

National Park In 1987 (NSW National Parks & Wildlife 1998, p. 172). The Blue Mountains are of outstanding historical value for their association with cultural movements to protect the natural environment from the depredations of modern industrial society.

9. Do you have any further feedback?

The Blue Mountains World Heritage Institute (BMWHI) is an independent not-for-profit organisation based in Katoomba, NSW. It supports the conservation of the natural and cultural heritage of the Greater Blue Mountains World Heritage Area (GBMWA), and for more than 15 years has delivered scientific research, education, social science and creative arts programs, and high quality documentation.

We welcome this consultation and the consideration of including additional areas and values to the National Heritage List and would welcome ongoing engagement with the Department during their consideration of these additions.

We support the proposed Statement of Significance proposed by the Greater Blue Mountains World Heritage Advisory Committee with respect to its outstanding geodiversity.

The Greater Blue Mountains are the best example in the world of a sedimentary upland, deeply dissected by rivers over tens of millions of years, and of the ongoing processes involved in sculpting these magnificent landforms'. The outcropping geology provides an outstanding illustration of the complex and long geological history of the east Australian coastal margin and highlights marine, terrestrial, volcanic and tectonic environments and processes through time. The geology also hosts exemplary erosional landforms/ elements including karst, caves, cliff lines, slot canyons, bottleneck valleys, pagodas and other sandstone landforms of national and international significance.

Whilst recognising the significance of the ecological values of the Greater Blue Mountains World Heritage site and adjacent areas we equally note the importance of the cultural values both Aboriginal and European inherent across these areas. We strongly support the nomination of these additional areas and values on the National Heritage List.

We note that whilst The Greater Blue Mountains World Heritage Area (GBMWA) was inscribed on the world heritage list on the 29th November 2000 for its outstanding natural values, that further evidence was required to substantiate Aboriginal cultural heritage. The work undertaken by the Blue Mountains World Heritage Institute commissioned by the Department of Environment and Water Resources to provide an assessment on the Aboriginal Cultural Heritage values of the Greater Blue Mountains World Heritage Area provides further evidence to support a renomination - a link to that report is [here](#).

We recognise the national and international significance of the importance of many areas across the Blue Mountains World Heritage Area to Aboriginal people for their use in Indigenous traditions. We strongly support the addition of Aboriginal cultural heritage on the national heritage list and a renomination for World Heritage as a matter of urgency.

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