Draft Light to Light Walk Strategy
Ben Boyd National Park
## Contents

Executive summary 5

1. Introduction 7
   1.1 Objectives of the Strategy 7

2. Background and project context 9
   2.1 Meeting NPWS vision and values 9
   2.2 NPWS Visitor Infrastructure Program 10
   2.3 Project constraints and opportunities 11

3. The Light to Light Walk upgrades 13
   3.1 Light to Light Walk vision and objectives 13
   3.2 Research and analysis 13
   3.3 Proposed multi-day walk experience 14
   3.4 The Light to Light Walk itinerary 15
   3.5 Project scope 17
   3.6 Minimum requirements for development 17
   3.7 Light to Light Walk track alignment principles 18
   3.8 Light to Light Walk accommodation principles 18

4. Assessments and approvals 21
   4.1 Assessments for new tracks and hut sites 21
   4.2 Plan of Management implications 21

5. Opportunities for partnerships 23
   5.1 Tourism partnerships 23
   5.2 The Light to Light Great Walk potential 23

6. Consultation 24

7. Appendices 25
   Appendix 1 – Preliminary track concepts 25
   Appendix 2 – Preliminary hut site concepts 29
List of tables

Summary of how this Strategy links to the plan of management 6
Table 1  Summary of how this Strategy links to the DPIE corporative vision 10
Table 2  Key principles for the upgraded Light to Light Walk Project 13
Table 3  Itinerary 15
Table 4  Summary of how this Strategy links to the plan of management 22

List of figures

Figure 1  Maps showing the Light to Light Walk location 7
Figure 2  Proposed Light to Light Walk – three-night/four-day concept overview 16
Figure 3  Proposed Light to Light Walk 25
Figure 4  Proposed Light to Light Walk (Day 1) 26
Figure 5  Proposed Light to Light Walk (Day 2) 27
Figure 6  Proposed Light to Light Walk (Day 3) 28
Figure 7  Mowarry Point proposed accommodation concept site area 29
Figure 8  Mowarry Point proposed accommodation concept layout 30
Figure 9  Hegartys Bay proposed accommodation concept site area 31
Figure 10  Hegartys Bay proposed accommodation concept layout 32

Glossary of terms

Commercial tour operators – refers to tourism operators granted a Parks Eco Pass by NSW National Parks and Wildlife Service that licenses operators of commercial tours, recreational and educational activities in parks.

Hut officer – National Parks and Wildlife Service (NPWS) staff member who will be in residence at each accommodation site to manage the operation of the Light to Light Walk.
Executive summary

NSW National Parks and Wildlife Service (NPWS) has been awarded $7.9 million from the NSW Government’s Regional Growth – Environment and Tourism Fund (RGETF) to significantly upgrade and realign the existing Light to Light Walk in Ben Boyd National Park near Eden, to create a world-class coastal Walk, including NPWS-managed accommodation for walkers. The funding commenced in July 2018 and the project is expected to be complete in 2021.

With increasing visitor numbers in Ben Boyd National Park and global demand for high quality walking experiences, this Strategy provides direction for NPWS to develop the Light to Light Walk (the Walk).

The upgraded Walk will offer a multi-day walk with overnight hard roofed accommodation providing a nature-based experience for visitors, seeking to experience the national park’s coastal environment and Aboriginal cultural and heritage experiences. The Walk will also foster partnership opportunities, while out of region visitors will contribute to the local and regional economy.

The Walk upgrade aims to increase the appreciation and engagement with a remote national park environment and conservation values. At the same time, better management of the Light to Light Walk visitation will protect park values and environmental issues.

The project scope includes an upgraded and realigned track between Boyds Tower and Green Cape Lighthouse and two new roofed accommodation sites to provide a hut to hut style experience for walkers. The development will be in keeping with park values for sustainability, visual amenity, and environmental and conservation values.

NPWS has undertaken a review of the plan of management and has prepared a plan of management amendment which will be publicly exhibited for consultation. NPWS is also undertaking rigorous environmental and cultural heritage assessments and is preparing a Review of Environmental Factors for the proposed upgrades to the Walk, including an Aboriginal cultural heritage survey and assessment.

NPWS intends to manage the upgraded hut to hut style walk experience, with on-site ‘Hut officers’ at each accommodation site, similar to the current operations at Green Cape Lightstation and a number of other NPWS properties.

A comprehensive process to develop the preferred operating model to manage the upgraded Light to Light Walk in a booked, fee-paying, hut to hut format is being undertaken. Partnerships will also be considered, which may include options for providing guided walking tours and value-add offers such as provisions (e.g. food, clothing, equipment and essential items), transfers and other associated support services.

Preliminary consultation has been ongoing with key stakeholders and the community via meetings and the NPWS have your say website. This Strategy is being exhibited with the draft Plan of Management Amendment. Further stakeholder engagement will be undertaken prior to construction approval.
<table>
<thead>
<tr>
<th>Scope</th>
<th>Requirements</th>
<th>Implication</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conservation</td>
<td>Hard roofed and tented accommodation</td>
<td>Permissible</td>
</tr>
<tr>
<td>Construction at Hegartys Bay</td>
<td>Hard roofed and tented accommodation</td>
<td>Requires amendment</td>
</tr>
<tr>
<td>Facilities and amenities at Mowarry and Hegartys Bay</td>
<td>Construction of infrastructure such as toilets, cooking and communal facilities manager’s hut and storage, in association with the accommodation for overnight walkers</td>
<td>Requires amendment</td>
</tr>
<tr>
<td>Modifications to Green Cape Lightstation</td>
<td>Reconfiguration of accommodation type and adaptive re-use of other buildings</td>
<td>Permissible</td>
</tr>
<tr>
<td>Construction at Green Cape Lightstation</td>
<td>Including consideration of facilities outside the Lightstation complex, in accordance with the Conservation Management Plan</td>
<td>Permissible</td>
</tr>
<tr>
<td>Construction at Green Cape Lightstation</td>
<td>Including consideration of facilities within the Lightstation complex</td>
<td>Requires amendment</td>
</tr>
<tr>
<td>Realignment of the Light to Light track</td>
<td>New track alignment to more closely follow the coast between Bittangabee Bay and Green Cape</td>
<td>Requires amendment</td>
</tr>
<tr>
<td>New sections of the Light to Light track</td>
<td>Constructing several new and or realigned short sections of walking track to better connect the Walk with beaches, lookouts and other nearby points of interest</td>
<td>Requires amendment</td>
</tr>
</tbody>
</table>
1. Introduction

NSW National Parks and Wildlife Service (NPWS) have developed this Strategy to outline proposed upgrades to the existing Light to Light Walk (the Walk) visitor experience. The upgrades will create more opportunities for a greater diversity of visitors to undertake the Walk, in keeping with NPWS core values, and will also support ongoing management of the Walk.

The Light to Light Walk is located in the Ben Boyd National Park near Eden, on the far south coast of New South Wales. The Walk provides a 30 kilometre track from Boyds’ Tower to Green Cape Lighthouse.

This Strategy describes the background and context for the proposal and subsequent funding. It includes maps and images to describe the proposal and its objectives and outcomes, as well as describing the assessment and approval processes that NPWS will apply to develop the project. The Strategy also provides information on changes to existing use and the future vision, including the development of partnerships with the tourism and services industry.

The Strategy is consistent with the major management strategies and programs outlined in the 2010 Ben Boyd National Park and Bell Bird Creek Nature Reserve Plan of Management (PoM). Amendments to the PoM are proposed to improve the Walk to meet contemporary standards and visitor expectations.

The Strategy will be refined to account for community feedback and the outcomes of environmental and cultural heritage assessments, operational and design requirements, and visitor expectations.

![Figure 1 Maps showing the Light to Light Walk location](image)

1.1 Objectives of the Strategy

The upgraded Light to Light Walk will allow visitors to undertake an immersive nature-based four-day/three-night experience that highlights the many special characteristics of the NSW far south coast and Ben Boyd National Park including remoteness, coastal connection and cultural heritage. And when combined with accommodation will place this Walk amongst any ‘best of’ list of unique Australian experiences.
This Strategy will

- Set the vision and standards to develop a multi-day experience that will place the Light to Light Walk amongst the best walks in Australia.
- Guide NPWS in the design development of the upgraded Light to Light Walk.
- Provide clear parameters to the design of new track alignments and the design and construction of new accommodation nodes.
- Guide the NPWS managers of Ben Boyd National Park when making decisions about how to develop and manage the tracks and accommodation.
- Outline how NPWS will manage park visitors using the Light to Light Walk and visitor sites along the walking route.
2. Background and project context

NSW NPWS has been awarded $7.9 million from the NSW Government’s Regional Growth – Environment and Tourism Fund (RGETF) to significantly upgrade and realign the existing Light to Light Walk to create a world-class coastal walk, including providing NPWS-managed roofed accommodation for walkers. The funding commenced in July 2018 and the project is expected to be complete in 2021.

The RGETF awarded funding in 2018 for regional environmental infrastructure projects on publicly owned land, and on private land where there is a clear public benefit, and regional tourism projects. Eligible projects were required to prove that they would deliver new or enhanced regional infrastructure that will drive growth in the visitor economy including growing regional visitor numbers and increasing overnight visitor expenditure.

The Strategy responds to the RGETF funding criteria, and NSW Government priorities including the Visitor Economy Industry Action Plan, Destination Southern NSW Destination Management Plan, and other regional strategies and policies. The project will deliver broad economic benefits to the region and New South Wales through the development of signature nature-based tourism projects.

The target market for the Light to Light Walk are identified as ‘Adventurers’\(^1\) by NPWS’ visitor analysis. With high conservation values and an active sense of adventure and exploration, the upgraded Light to Light Walk will offer visitors a genuine nature-based experience that is unique, challenging and offers a remote and immersive opportunity in a national park.

2.1 Meeting NPWS vision and values

The Strategy reflects the vision of NPWS to ‘inspire everyone to love their national parks’.

NPWS has four principles which underpin this vision:

1. conservation
2. culture and heritage
3. communities
4. experiences

A summary of how this Light to Light Walk Strategy contributes toward the vision is included below.

\(^1\) Source: NPWS Domestic Market Segmentation
Table 1  Summary of how this Strategy links to the DPIE corporate vision

<table>
<thead>
<tr>
<th>Principle</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conservation</td>
<td>• Managing the environmental impacts of walkers by directing walkers to a range of managed accommodation and camp sites where toilets and other facilities are available</td>
</tr>
<tr>
<td></td>
<td>• Developing an educational focus for the Walk that will foster an improved understanding of conservation works and encourage future stewardship of national parks</td>
</tr>
<tr>
<td></td>
<td>• Selecting a route that will minimise impacts to biodiversity values</td>
</tr>
<tr>
<td>Culture and heritage</td>
<td>• Providing a visitor experience and facilities that foster education, awareness and respect for the Aboriginal and historic heritage in the region</td>
</tr>
<tr>
<td>Communities</td>
<td>• Deliver economic benefits by increasing the appeal and capacity for a broader range of visitors to come to the region; offering service partnerships and local jobs through the walking track project</td>
</tr>
<tr>
<td>Experiences</td>
<td>• Providing an innovative experience for a greater range of visitors through the high quality walking track and supporting facilities that build a memorable connection with the exceptional natural environment in Ben Boyd National Park</td>
</tr>
</tbody>
</table>

2.2  NPWS Visitor Infrastructure Program

The Light to Light Walk Project was identified as part of the NPWS Visitor Infrastructure Program – a long term Strategy to deliver unique visitor experiences in NSW national parks that connect people with culture and nature.

NPWS Visitor Infrastructure Program objectives

The delivery of the Light to Light Walk Project will meet the objectives of the NPWS Visitor Infrastructure Program to deliver nature-based tourism projects that:

- are iconic, imaginative, inspiring and innovative
- transform the way visitors interact with the location
- provide a cohesive and strategic vision for the project location
- provide commercial and other partnership opportunities
- have the capacity to deliver regional economic benefits.

NPWS Visitor Infrastructure Program outcomes

The Strategy for the Light to Light Walk upgrade is consistent with the NPWS Visitor Infrastructure Program outcomes to:

- meet demand for nature-based tourism and walking tracks, including visitation growth and greater regional dispersal of recreational activities
- increase participation in visitor activities and promotion of park stewardship with flow-on benefits to future revenue generation
- support national and State policies to increase international and domestic tourism in New South Wales
- align with the vision to inspire everyone to love their national parks.
2.3 Project constraints and opportunities

2.3.1 Constraints

The existing Light to Light Walk is undertaken as a two or three day Walk with users camping at either the public campgrounds – Saltwater and Bittangabee Bay – where toilets and other facilities are available, or at locations along the track with no toilet or cooking facilities. Camping where there are no facilities is creating potential environmental impacts, particularly with increasing visitation, with evidence of fires in areas where fires are not permitted.

Commencing at the northern trail head of Boyds Tower, the existing track follows the coast for approximately 60% of the Walk, deviating to some management trail sections and crossing several management trails, which detracts considerably from the visitor experience, and does not provide a world-class multi-day walk standard.

The existing southern section (south of Bittangabee Bay) follows an historic track inland through sensitive heath area. Realigning this section of the track to the coast will enable rehabilitation of the heath, reduce the impact on threatened species and deliver a better visitor experience.

Some sections of the coastline and headlands contain Aboriginal middens. Extensive planning has been undertaken to avoid and protect cultural places.

Areas of the Walk require upgrading to include steps to improve safety, and some sections of the track need to be realigned to reduce the degree of slope and utilize natural contours to lessen the impact of track erosion.

With the provision of roofed accommodation on the track, the Light to Light Walk will be considered one of the best multi-day walks in Australia, and the first coastal ‘hut to hut’ style walk for NSW in a national park. The Walk will enable NPWS to better manage visitation and greatly improve the visitor experience.

2.3.2 Opportunities

Within NSW national parks, participation in nature-based walks by visitors as a preferred park activity has grown from 49% in 2014 to 63% in 2016, while demand for commercial multi-day walks grew by 45% each year between 2014 and 2017 and continues to increase.²

² NPWS (July 2017) Walking Smarter Strategic Directions for Realising Best Nature Walks in NSW National Parks
The Light to Light Walk upgrade responds to the growing interest in nature-based experiences and multi-day walks in a national park and is consistent with NPWS vision to inspire everyone to love national parks.

The upgrade of the Walk to a multi-day ‘hut to hut’ style walk will provide a more accessible experience to a wider range of park visitors with varying capabilities, ages and walking expertise than is currently available. With relatively short walking lengths each day, and the provision of overnight accommodation, walkers will be able to carry a lighter pack without tents, mattresses, and cooking equipment.

NPWS will foster partnership opportunities. The Strategy envisages that a range of associated services will support the upgraded Walk including but not limited to, for example, commercial operators offering various levels of assistance to individuals or groups, transfer services, food provisions, value-add tours and experiences pre and post Walk.

The Light to Light Walk will contribute to the local and regional economy, creating jobs in tourism and hospitality sectors through increased visitation that will generate intrastate, interstate and overseas tourism expenditure.

The project will support and enhance local business opportunities as track-users prepare for their walk experience including nearby accommodation pre and post Walk. The construction of the Walk will also generate economic and employment opportunities. Additionally, the project will provide opportunities to strengthen local and regional partnerships, including working with the Aboriginal community.

The upgraded Light to Light Walk will provide opportunities for storytelling through an interpretation strategy developed to promote the environment and cultural heritage of the national park, and the region’s rich history and conservation values.

Photo: Beach at Mowarry Point. NewScape
3. The Light to Light Walk upgrades

3.1 Light to Light Walk vision and objectives

The Walk upgrade aims to diminish perceived barriers to undertaking a multi-day-walking holiday, and thereby introduce a new audience to experiencing a remote national park environment and engaging with conservation values.

At the same time, better management of the Light to Light Walk visitation will protect park values and address environmental issues.

Table 2 below outlines the principles behind the project.

<table>
<thead>
<tr>
<th>Table 2</th>
<th>Key principles for the upgraded Light to Light Walk Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vision</td>
<td>• To create a world-class walk in an immersive four-day experience offering remoteness, wilderness, coastal connection and cultural heritage in one of the most dramatic settings in Australia</td>
</tr>
<tr>
<td>Strategy</td>
<td>• Upgrade and realign the existing Walk from historic Boyds Tower to Green Cape Lighthouse as a ‘hut to hut’ style multi-day walk, and with additional tours, deliver an outstanding four-day visitor experience</td>
</tr>
</tbody>
</table>
| Objectives| • Develop the Light to Light Walk to become internationally recognised  
• Develop a unique walking experience of superior memorability  
• Develop an operational model with a net positive financial outcome |
| Outcomes | • The region is recognised as the home of one of Tourism Australia’s Signature Experiences of Australia, with demand from domestic and international tourists  
• Promote the unique natural landscape, ecology, culture and heritage of NSW national parks in the region  
• Contribute to the local and regional economy and generate employment opportunities  
• Provide visitors/walkers with a world-class walking experience and accommodation choices |

3.2 Research and analysis

NPWS has undertaken extensive track design investigation and site analysis, to develop a new concept for the Light to Light Walk that will deliver a significantly improved four-day visitor experience through investment in upgrading the track with three nights’ hard or soft-roofed accommodation in the national park.

The Strategy has been developed following benchmarking of best practice operational models in New Zealand, Tasmania and Victoria, review of barriers to visitors undertaking a multi-day walk, and specific market testing of multi-day walk experience options in a remote national park.

Guidance and advice on track and accommodation design and operating models has been provided by the New Zealand Department of Conservation for their Great Walks program of premier tracks, Tasmania Parks and Wildlife Service for the Overland Track and the Three Capes Track, and Parks Victoria for Grampians Peak Trail. An open and ongoing lessons learnt approach between these agencies and the NSW NPWS has provided an important and robust basis to inform this Strategy, track and accommodation planning, and operations planning.
Research and customer demand modelling have provided a clear understanding of barriers to people visiting national parks. This research indicates that barriers to undertaking a multi-day walk include a lack of accommodation options other than camping, pack weight required for self-sufficient walks, lack of supporting facilities and service (toilets, shelter), overnight temperatures and weather, track distances longer than 10-12 kilometres per day, track difficulty requiring a high level of fitness, and inability to walk with multi-generational groups.

In addition, the Strategy is informed by specific modelling of the multi-day walk and user markets to measure demand against planning options and potential inclusions. This has provided in-depth analysis on walker preferences, price range, group and room size, facilities, ages and group types, booking and transfer options, etc. Taken together with benchmarking existing multi-day walks in similar regions and markets, and direction and guidance from the South Coast Branch and other regional stakeholders, the Strategy has been well-informed from several perspectives. Planning will continue to be developed to deliver the best outcome.

### 3.3 Proposed multi-day walk experience

With increasing visitor numbers in Ben Boyd National Park and demand for high quality walking experiences, this Strategy provides direction for NPWS to develop opportunities that manage the increasing number of walkers and address environmental issues.

The Walk will become the first coastal ‘hut to hut’ style walk in a NSW national park, in the vein of Tasmania’s walking track model, with new eco-accommodation for walkers on Day 1 and 2, and accommodation at the Green Cape Lightstation on the final night. Each site will have an on-site Hut officer in residence at each accommodation site to manage the operation of the Light to Light Walk. These roles are being refined as planning progresses.

The proposed upgrades will provide an easy entry level walk, in short day lengths, typically 8–12 kilometres per day, with hut or tented accommodation to be developed for Day 1 and 2. This approach will enable this unique nature-based experience to be achievable for a wider range of visitors with varying capabilities, walking expertise, and ages including multi-generational users.

Roofed accommodation and facilities add appeal to both experienced and new walkers, allowing lighter packs by avoiding the need to carry tents, bedding or cooking equipment.

The Walk is being considered for booking year-round, with possible short closures for maintenance at certain times to be determined by NPWS management. The introduction of roofed accommodation will extend the Light to Light walking season, providing shelter from poor weather, winds and cold nights with hut accommodation that otherwise has tended to limit visitors to the peak season in warmer months which are already busy periods in Ben Boyd National Park.

The four-day experience will be fully managed by NPWS for a fee relative to the accommodation and booked through the NPWS website. Revenue will contribute to the ongoing management and operation of the Walk, public campsites and amenities, and ongoing conservation work by NPWS.

The Walk will have the potential to be undertaken as self-guided or with various levels of support services, and as individuals or groups. NPWS is yet to review and develop possible arrangements and opportunities for operators. NPWS will manage any future commercial tour operators for the Light to Light Walk through its commercial tour operator licensing system and encourage quality businesses, with a commitment to eco-tourism standards.

Carrying capacity has been carefully considered to balance the remoteness sought by multi-day walkers and general park visitation, including walkers who may prefer to use existing campsites. Each accommodation site is proposed to cater for a maximum of 36 walkers per
night. A combination of hut or tented (or rooms at Green Cape Lightstation) accommodation will be developed, similar to Tasmanian multi-day walk models.

Independent walkers intending on self-managed camping will be able to book in tent-only campsites at the existing Saltwater and Bittangabee campgrounds, where there is access to toilets and other facilities. Camping fees apply when booking sites.

Pack camping and other informal camping, i.e. camping at sites where there are no facilities, will no longer be permitted on the Light to Light Walk. This includes pack camping at Leather Jacket Bay, Mowarry Point and Hegartys Bay.

Increased capacity for tent-only camping is planned for Saltwater and Bittangabee campgrounds. School groups and other larger groups will also be accommodated at these sites. Car-based camping will continue to be available at Saltwater and Bittangabee campgrounds. Day use at Leather Jacket Bay, Mowarry Point and Hegartys Bay will continue to be available.

### 3.4 The Light to Light Walk itinerary

The Light to Light Walk will offer a new four-day, three-night walking experience.

<table>
<thead>
<tr>
<th>Day</th>
<th>Description</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Day 1</td>
<td>Boyds Tower to Mowarry Point (8.7kms)</td>
<td>Will commence at the historic Boyds Tower in the north. Walkers will experience remarkable views along the eastern coastline as they trek through melaleuca woodlands to the spectacular Red Sands Bay. Further along the track Leather Jacket Bay is a potential location for lunch before continuing the Walk to Mowarry Point for the night.</td>
</tr>
<tr>
<td>Day 2</td>
<td>Mowarry Point to Hegartys Bay (10.2km)</td>
<td>Sets off from Mowarry Point and travels across the rocky coastline, over rock formations and to secluded beaches. Walkers could enjoy lunch at Woodburn Creek before continuing on to Hegartys Bay for the second night.</td>
</tr>
<tr>
<td>Day 3</td>
<td>Hegartys Bay to Green Cape Lighthouse (11.6km)</td>
<td>Leaves from Hegartys Bay with walkers covering 11.6 kms to Green Cape Lighthouse. The day includes minor creek crossings, spectacular rock ledges and forests. Early settlement history of the region is found visiting ruins at Bittangabee Bay. Lunch could be a stop at Pulpit Rock before reaching the final night's accommodation at Green Cape Lighthouse.</td>
</tr>
<tr>
<td>Day 4</td>
<td>Green Cape Lighthouse to Disaster Bay tours</td>
<td>Changes pace with a tour of the Green Cape Lighthouse, nature and heritage tours, and finishes with views from Disaster Bay Lookout.</td>
</tr>
</tbody>
</table>
Figure 2   Proposed Light to Light Walk – three-night/four-day concept overview
3.5 Project scope

The Walk will deliver an upgraded 30 kilometre coastal trail, with construction scope consisting of:

- approximately 10km of new and realigned tracks
- closure and rehabilitation of approximately 10km of existing tracks
- approximately 20km of existing track receiving some upgrades
- improved alignment of some existing track to better manage environmental impacts
- refreshed start point at Boyds Tower lookout including accessible paths from carpark to an upgraded lookout
- two new sites comprising hut and/or tented accommodation, communal kitchen/dining/seating area, toilets and Hut officer accommodation, work area and storage
- solar power and battery storage at hut sites
- minor refurbishment to four lightkeepers’ cottages and the adaptive re-use of the historic Stables building for accommodation at Green Cape Lightstation
- upgrades to solar power and battery capacity, sewerage at Green Cape Lightstation
- development of interpretation and storytelling along the walk, through physical signage and/or digital technologies.

Preliminary concept layouts are attached (Appendix 2)

3.6 Minimum requirements for development

3.6.1 Developing tracks

Extensive track investigation has been undertaken by NPWS and specialist track designers, with further advice from environmental specialists and the Aboriginal community to identify the final route. The track will be predominantly a natural surface offering an easy-moderate level walking track consistent with the current track condition.

Track locations aim to provide connectivity to park features while considering safety and respecting the environment and conservation values of the park. Safety and risk assessments will be undertaken during planning and construction of the track. NPWS environmental and cultural heritage assessment and approval processes are applied to the final track locations.

3.6.2 Developing accommodation

Two sites have been identified as appropriate for roofed accommodation. NPWS planning assessment and approval process will be applied to the sites. The accommodation development will be in keeping with park values for sustainability, visual amenity and environmental and conservation values.

3.6.3 Minimum requirements

Minimum requirements for the track and accommodation development shall include:
- contribution to NPWS objectives and values
• foster public appreciation of the park’s natural and cultural values
• development must result in low or positive net environmental impact to the park
• environmental assessments that are compliant with relevant legislation
• compliance with the Ben Boyd National Park PoM and amendments
• compliance with Department of Planning, Industry and Environment sustainability policies and strive for best practice where feasible
• revenue generated will enable conservation projects and asset maintenance.

3.7 Light to Light Walk track alignment principles

The track realignment is considered an important aspect of the Light to Light Walk Project. Commencing at Boyds Tower, the track between Boyds Tower and Bittangabee Bay (Day 1 and Day 2) is proposed to be generally consistent with the existing alignment. Several short sections are proposed to be upgraded and/or realigned to improve the track, to lessen track maintenance, and provide better access to park features for a memorable experience.

The existing section of track between Bittangabee Bay and Green Cape Lighthouse (Day 3) currently passes through several kilometres of sensitive heath environment. This section will be realigned to provide a new coastal track and allow rehabilitation of the heath. The existing track from Pulpit Rock to Green Cape Lightstation through the heath will be retained to allow for bird watching, nature tours education and conservation purposes.

The new coastal track alignment in the southern section of the Walk (Day 3) is proposed to pass through Pulpit Rock, which is a popular fishing location. Current fishing activities at Pulpit Rock will continue to be permitted, and the carpark will be relocated west of its current location.

The proposal also includes several new short sections of tracks to allow access to nearby points of interest and coastal views.

NPWS has investigated extending the track from Green Cape Lighthouse to Disaster Bay. Following cultural heritage surveys, NPWS has determined not to construct a new track in this section of the park as previously planned in order to protect Aboriginal heritage sites. The carpark at Disaster Bay will be upgraded and a new accessible toilet will be provided to continue to cater for increased visitation at the lookout, including for the Light to Light Walk.

Figure 2 indicates the general alignment of the upgraded Light to Light Walk. Preliminary track concepts are attached (Appendix 1).

3.8 Light to Light Walk accommodation principles

3.8.1 Hut sites

Accommodation at Mowarry Point and Hegartys Bay is proposed to include a combination of hut and tented accommodation, a communal kitchen and dining area, seating area, toilets and Hut officer accommodation and storage. Carrying capacity across each accommodation site is proposed to be 36 walkers per night, subject to final planning.

The proposed huts for the Walk are to be fully enclosed structures with weather lock doors and windows. The structure will be designed to reflect best practice environmentally sensitive design and a ‘tread lightly’ approach. The level of appointment will be simple, comfortable and easy to maintain.
The Light to Light hut sites are proposed to include:

- bunk style accommodation – final type, mix and configuration will be confirmed in further planning
- internal gear storage and drying
- communal kitchen/dining area with preparation benches, built in gas stoves and sinks
- verandah for weather protection and to serve as an outdoor common area
- LPG bottles for gas heating and cooking
- water tanks for collection of rainwater
- solar panels will feed a battery bank that runs a low power LED lighting system
- ecologically sustainable toilets
- separately located twin/double tents or similar – final type, mix and configuration will be confirmed in further planning
- hut officer accommodation and work area
- equipment storage shed
- helipad for emergency access

Preliminary site concepts are attached (Appendix 2)

3.8.2 Hut site design principles

The hut site buildings will be:

- tailored to each site and avoid unnecessary impact on visual amenity, environmental and conservation values
- designed to minimal footprints with a focus on environmental and cultural sensitivities
- designed to be best practice sustainable development, including lifecycle considerations, sustainable water, power and other services
- designed to meet fire prevention standards
- self-reliant for water collection, solar power, sewerage treatment and designed for maximum operating efficiency including equipment using renewable resources as feasible
- appropriately designed to natural materials, colours and finishes sympathetic to the natural surrounds; the level of appointment will be basic, but comfortable and easy to maintain

3.8.3 Accommodation at Green Cape Lightstation

Green Cape Lightstation will be used to accommodate walkers on the third and final night, utilising the lightkeepers cottages and the Telegraph Station, undertaking adaptive re-use of the Stables and other buildings where viable to accommodate walkers. Configurations will mirror arrangements at the hut sites.

Provision for an on-site Hut officer, maintenance and equipment storage, and workspace will be included, similar to current arrangements at the Lightstation complex.

Adaptive re-use of the heritage buildings for visitor accommodation and tourism-related services is allowed in the existing 2010 plan of management. New structures within the Green Cape Light Station complex may also be investigated. Planning is yet to be completed to determine the final scope of works. Works will be in accordance with the amended plan of management and consistent with heritage requirements.
3.8.4 Changes to Green Cape Lightstation casual bookings

The use of the Lightstation cottages and buildings for the upgraded Walk’s new accommodation model will require changes to the current use of Green Cape Lightstation for casual short-stay bookings that may result in the Lightstation no longer being available for casual short-stay accommodation. Further planning will be undertaken for NPWS to determine if there is capacity for limited casual booking to be offered for short periods.

Photo: Green Cape Light house and Lightstation complex. Grant Hunt
4. Assessments and approvals

Our national parks are managed to protect their unique values and provide for sustainable visitor use and enjoyment. This includes providing visitor experiences and, where appropriate, new visitor facilities including tracks and facilities to support engagement with visitors.

For the Light to Light Walk upgrade, NPWS has undertaken a review of the plan of management and prepared a draft Plan of Management Amendment to be publicly exhibited for consultation prior to the Minister’s consideration for adoption. This will enable new works not included in the current (2010) Plan of Management to be undertaken.

NPWS is undertaking environmental and cultural heritage assessments for the works and will prepare a Review of Environmental Factors (REF) in accordance with the Environmental Planning and Assessment Act 1979 for the track and building upgrades. The REF will be made available.

4.1 Assessments for new tracks and hut sites

4.1.2 Environmental assessment

Independent environmental assessments are being conducted for the project, to investigate and assess potential environmental impacts to track and hut site locations. The subsequent reports have provided information to guide avoidance and/or mitigation actions and environmental safeguards, to maintain and improve environmental values, including heritage values.

NPWS has committed to increased predator control programs around the new tracks of the Light to Light Walk as an environmental mitigation measure.

4.1.3 Aboriginal cultural heritage assessment

Consultants have undertaken an Aboriginal cultural heritage assessment on the proposed Walk. Due to new findings of Aboriginal sites, the proposed extension to the Walk south of Green Cape Lighthouse to Disaster Bay will not be developed. Ongoing consultation with Aboriginal groups may consider if access to cultural sites is appropriate and can be part of the upgraded Light to Light Walk experience.

Aboriginal sites along the walk will be monitored to ensure impacts are not increased with the Light to Light Walk.

4.2 Plan of Management implications

The 2010 Ben Boyd National Park Plan of Management has been reviewed and a draft amendment has been prepared to enable proposed modifications to the Walk and other upgrades. This Strategy provides further context to the amended plan of management.

The amended plan of management will enable NPWS to deliver the upgrades to the Light to Light Walk to meet the project objectives, in line with the objectives of the NPWS Visitor Infrastructure Program and the RGETF funding.

Elements of the proposed Walk upgrades and their relationship to the plan of management are outlined in the table below.
<table>
<thead>
<tr>
<th>Scope</th>
<th>Requirements</th>
<th>PoM implication</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conservation</td>
<td>Hard roofed and tented accommodation</td>
<td>Permissible</td>
</tr>
<tr>
<td>Construction at Hegartys Bay</td>
<td>Hard roofed and tented accommodation</td>
<td>Requires amendment</td>
</tr>
<tr>
<td>Facilities and amenities at Mowarry and Hegartys Bay</td>
<td>Construction of infrastructure such as toilets, cooking and communal facilities manager’s hut and storage, in association with the accommodation for overnight walkers</td>
<td>Requires amendment</td>
</tr>
<tr>
<td>Modifications to Green Cape Lightstation</td>
<td>Reconfiguration of accommodation type and adaptive re-use of other buildings</td>
<td>Permissible</td>
</tr>
<tr>
<td>Construction at Green Cape Lightstation</td>
<td>Including consideration of facilities outside the Lightstation complex, in accordance with the Conservation Management Plan</td>
<td>Permissible</td>
</tr>
<tr>
<td>Construction at Green Cape Lightstation</td>
<td>Including consideration of facilities within the Lightstation complex</td>
<td>Requires amendment</td>
</tr>
<tr>
<td>Realignment of the Light to Light track</td>
<td>New track alignment to more closely follow the coast between Bittangabee Bay and Green Cape</td>
<td>Requires amendment</td>
</tr>
<tr>
<td>New sections of the Light to Light track</td>
<td>Constructing several new and or realigned short sections of walking track to better connect the Walk with beaches, lookouts and other nearby points of interest</td>
<td>Requires amendment</td>
</tr>
</tbody>
</table>

Photo: Pulpit Rock. NewScape Design
5. Opportunities for partnerships

5.1 Tourism partnerships

The tourism industry offers opportunities to add support services and guided experiences on the Light to Light Walk. NPWS will explore commercial and non-commercial industry partnerships to deliver quality visitor experiences. Examples may include transfer services, guided tours and food provision.

NPWS intends to manage the Walk experience, including on-site operations through the provision of Hut officers at each accommodation site, similar to that of current operations at Green Cape Lightstation. A model to determine the best operating framework to manage the Light to Light Walk for a booked, fee-paying, hut to hut format is being undertaken by NPWS.

NPWS has undertaken market demand research to identify consumer demand for various services and experiences. Further market testing and meetings with the tourism services industry will occur to investigate the level of commercial interest in the market to facilitate and support relevant visitor experiences on the Light to Light Walk.

5.2 The Light to Light Great Walk potential

The upgrade of the Light to Light Walk will deliver a quality nature-based experience, which may in the future enable an operator to gain accreditation as a Great Walk of Australia.

Membership of the Great Walk of Australia is gained by a private tour operator who must meet certain criteria for a luxury experience, including guides and high quality private accommodation. Under the current planning, consideration of this option would be restricted to an operator developing or using off-park private accommodation.

An expression of interest process would be undertaken to select an operator in this case, and a rigorous selection and approval process would be required.
6. Consultation

Preliminary consultation with key stakeholders was undertaken for proof of concept to prepare the business case in 2017, including with the Eden Local Aboriginal Land Council (LALC), Destination NSW, Bega Valley Shire Council, Sapphire Coast Tourism, and industry experts.

NPWS has prepared a Stakeholder Engagement Plan which will be updated as the planning progresses. The community and interested stakeholders have been invited to register their interest and provide comments on the Draft Light to Light Walk Strategy: Public Consultation page.

Key stakeholders including agencies, local government council, the Eden LALC, NPWS Regional Advisory Committee, interested associations and tourism bodies are regularly updated on the progress of the project planning.

Consultation for the Light to Light Walk upgrade will be undertaken with public exhibition of the plan of management amendment and Light to Light Walk Strategy. Further stakeholder engagement will be undertaken prior to construction approval.

Photo: Light to Light Walk. Grant Hunt
7. Appendices

Appendix 1 – Preliminary track concepts

Figure 3 Proposed Light to Light Walk
Figure 4 Proposed Light to Light Walk (Day 1)
Figure 5  Proposed Light to Light Walk (Day 2)
Figure 6  Proposed Light to Light Walk (Day 3)
Appendix 2 – Preliminary hut site concepts

Figure 7  Mowarry Point proposed accommodation concept site area
Figure 8 Mowarry Point proposed accommodation concept layout
Figure 9  Hegartys Bay proposed accommodation concept site area
Figure 10  Hegartys Bay proposed accommodation concept layout