



Thursday June 16, 2022

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Dear Sir/Madam,

#### **Gardens of Stone State Conservation Area draft master plan**

Wilderness Australia is delighted that the NSW Government proclaimed a wonderful 28,332ha State Conservation Area (SCA) on May 6<sup>th</sup> 2022 that protects pagoda landscapes and a vast array of rare plant and animal life. The new reserve protects the core of the Gardens of Stone and more than doubles the protected area in the Gardens of Stone region. Once reserve establishment is completed, thousands will be spellbound by this true natural wonderland.

The planning for the reserve has been rushed, with visitor management master plan focused on thrill-seeking adventures being exhibited for public comment while other management aspects have not been finalised. If the reserve is not restored to good health, the plans for tourism growth will fail. Visitors will see environmental degradation, rather than a world-class environmental restoration program integrated with nature-focused visitor management.

Wilderness Australia makes the following suggestions and comments seeking to improve conservation outcomes, visitor experiences and Lithgow community benefits.

#### **Summary**

Wilderness Australia welcomes those aspects of the draft Master Plan that deliver basic facilities like campgrounds, walking tracks, carparks and lookouts built on already disturbed land and serviced by good 2WD roads that everyone can use. A significant reduction in past use impacts through environmental restoration associated with visitor facility development and the banning use of motorised trail bikes offroad are excellent visitor management initiatives for the new reserve.

Aboriginal community involvement in reserve management, including through economic opportunities and employment, is also welcomed.

By providing 2WD road from Clarence in the east, however, visitors are unlikely to visit Lithgow on their way to and from this exciting new reserve.

Wilderness Australia **objects** to the following aspects of the draft Master Plan for the Gardens of Stone SCA:

- The precedent of a complex, flexible planning framework that creates uncertain heritage conservation and visitor use outcomes;
- The precedent of a commercial adventure theme park style development in a NPWS reserve, unnecessarily ruining views of the iconic Lost City;
- The precedent of new commercial accommodation hubs in a Blue Mountains reserve;
- The disregard of the management principle for a State Conservation Area (SCA) requiring visitor and tourist use to be '*compatible with*' the conservation of heritage values [30G(e) of National Parks and Wildlife Act (NPW Act)];
- Failure of road access management, as reserve visitors are unlikely to visit Lithgow, defeating the intended but mistaken objective of tourism growth through commercial development of an adventure theme park and accommodation hubs;
- The multi-million dollar subsidy of commercial tourism infrastructure will greatly reduce the provision of basic visitor facilities and road access required for the anticipated 200,000 visitors a year; and
- The potential misuse of biodiversity offset funds through expenditure on reserve operational requirements and staff, rather than expending these funds on the better management of national heritage in the reserve.

Wilderness Australia believes the appropriate role for the draft Master Plan is to inform a concise, and spatially defined scheme of operations set out in a revised draft Plan of Management (dPoM). The revised dPoM should then be put on public exhibition and review for a further 60 days to fine tune all aspects of reserve management, including a defined set of visitor use proposals.

Past park plans of management have successfully delivered visitor management for the national parks and reserve estate of NSW. This draft Master Plan presents no reasons to change the current approach.

The draft Master Plan's new approach of understanding values, identifying a vision, developing planning principles and then strategies, precinct and area plans is sound. The draft Master Plan did not implement this approach. Instead, the consultants adopted the visitor use proposals provided by the NPWS, with little regard to the proposed methodology.

The draft Master Plan failed to effectively grapple with the complexity of the reserve because its methodology was not objectively, fairly and independently applied. The draft Master Plan is, then, a 'fig leaf' for the broad set of aspirational visitor use proposals it contains.

## **Introduction**

Wilderness Australia, founded in 1968, is Australia's the oldest wilderness conservation group. The organisation has played a critical role in the gazettal of over 2 million hectares of wilderness and many national parks and reserves, including the Gardens of Stone State Conservation Area.

The Gardens of Stone State Conservation Area is a natural wonderland and protection of heritage, including geodiversity and scenery, must be given priority when reviewing the visitor use arrangements proposed in the draft Master Plan. The NPWS must also provide opportunities for Traditional Owners to care for and share Country and Aboriginal culture, including economic opportunities.

The management principles for state conservation areas under the National Parks and Wildlife Act, 1974, that specify visitor use and tourism must be *compatible with* the conservation of heritage values. Reserve management principles are part of the objects of the NPW Act and must not be taken lightly, for example treated as a guide, as these principles place legal obligations on the NPWS. In some instances, the draft Master Plan flouts these management principles, for example, the proposed Lost City adventure theme park that causes visual blight to an important site of internationally significant geodiversity.

To protect the scenic value and geodiversity value of Lithgow's best attraction, Wilderness Australia proposes State Mine Gully as an alternative location for the adventure tourism hub. This alternative site can provide greater tourism benefit to Lithgow through potentially boosting visits to the State Mine Museum and more closely associating this adventure hub with the town centre.

This alternative location is compatible with the NPW Act, as State Mine Gully is a cultural landscape with views of Lithgow and an old coal mine portal called Dobbs Drift. Although development there will cause environmental damage, as it will anywhere, the development can be considered an adaptive reuse of this former coal mine site.

Apart from the adventure theme park, many other visitor use proposals in the draft Master Plan (dMP), clearly are compatible with the conservation of heritage values. The proposed nature-focused facilities include walking tracks and lookouts serviced by roads suitable for 2WD vehicles. Development of these facilities on degraded sites also create a net conservation gain by providing opportunities to restore natural environments degraded by past use.

The Forest Camp proposal takes another approach toward environmental restoration. A range of proposed basic camping facilities are an adaptive reuse of the former pine plantation, restoring cleared and degraded lands. Around the Forest Camp are options for walks, lookouts and rides on existing forest roads, all of which will prove popular with future visitors from a broad cross-section of the community. Where facilities are to be developed in adjoining bushland, these facilities will have a relatively small footprint and be available to all visitors. Further, if these facilities were not developed, significant unregulated visitation to bushland attractions and viewpoints around the proposed Forest Camp would cause greater environmental degradation than the proposed facilities. These new facilities in bushland are justified as being compatible with heritage conservation. These proposals are also consistent with past NPWS management practices for NSW protected areas where a range of basic visitor facilities are provided for everyone.

The proposals for gravel bicycle touring on fire roads in the reserve are also compatible with nature conservation. The extensive proposals for downhill mountain biking opportunities on single track, however, are excessive. These opportunities are already provided at Hassans Walls, a large Council reserve adjoining Lithgow to the south. The marginal increase in visitor enjoyment from additional trails proposed in the new reserve would not be justified by the increases in environmental damage caused by new trail construction.

Visitor facility works must not, however, use the Biodiversity Offset Funds earmarked for better management of national heritage in compensation for damage caused by past coal mining within the reserve. Integration of national heritage management with general reserve management using these offset funds must be limited to circumstances with a clear benefit the protection and management of these values. Offset compensation payment is not a slush fund for operational requirements of NPWS reserve management.

## **Defects with this Master Plan process**

Wilderness Australia opposes the draft Master Plan (dMP) process for determining visitor management in the Gardens of Stone State Conservation Area. The dMP seeks to replace the statutory plan of management processes that, up to this point in time, have successfully regulated delivery of location-specific for visitor facilities and access in NSW reserves.

The master plan process is too flexible and this particular dMP has also created unreasonable expectations about an aspirational range of facilities it proposes for user groups. These characteristics of this dMP are likely to cause users to be more dissatisfied with the outcomes.

Other structural weaknesses of the draft Master Plan are partly due to a tight report delivery timeframe for a reserve with many complex visitor management issues.

The Lost City Adventure Hub and the Accommodation Hubs were political decisions, while others were made by the NPWS to appease various user groups. Additional changes to visitor use proposals are being made during the public exhibition process under the dMP's 'flexible processes'. Continuous change erodes certainty about what is being proposed and on what matters the public should comment.

Another weakness is that the management objectives and strategies in the draft Master Plan duplicate those in the draft Plan of Management, confusing the reader and requiring them to cross check between these documents. The objectives and strategies in Plan of Management, being a statutory instrument, prevail and the dMP should have integrated these planning principles. The authors of the dMP apparently found it necessary to 'reinvented the wheel' because the objectives and strategies in the draft plan of management lacked precision.

The draft Master Plan fails to deliver on the objective that adventure tourism be sympathetic with the natural surroundings. At Lost City the views of internationally significant geodiversity from the proposed main lookout shall be blighted by the proposed adventure hub facilities. Further, a 4WD road is proposed down the centreline of Lost City 2 ridge, located to the west of the Lost City proper. Vehicles accessing this ridge shall cause vehicles and windscreen glint to further spoil views from the iconic Lost City lookout. The draft Master Plan identifies the visual blight of vehicles be avoided, and then proposes access in contradiction to its strategy.

Better solutions can be achieved if the significance of Lithgow's prime Lost City attraction is considered in the context of the statutory management principles, draft Master Plan's objectives and strategies, and 4WD vehicle access concessions adjusted to meet these requirements. What is the point of the flexibility of the draft Master Plan and public consultation if serious planning defects are not addressed? The Lost City is a superb example of internationally significant geodiversity and proposed development that damages the scenic amenity of this site is incompatible with protection of this value.

The draft Plan of Management states that the location of new infrastructure and the location of areas to be designated for vehicle access, cycling and horse riding will be determined 'during the development of a detailed master plan' (page 5 dPoM). The draft Master Plan then explains how it will determine and locate visitor use infrastructure. It explains that 'the master plan should be viewed as a dynamic strategic planning tool that sets a long-term framework for the Gardens of Stone SCA which can be adapted to accommodate unforeseen changes as they arise' (pg 8 dMP).

The draft Master Plan should guide selection of an achievable range of place-specific visitor access and facility proposals. Once selected, a revised draft plan of management should be readvertised

through the usual open, transparent public processes. Otherwise the Master Plan's *dynamic process* may result in an on-going dispute over reserve management probably involving the local member who is the Deputy Premier, resulting in indecision, waste and poor choices.

Whatever the final choice, the visitor facilities in the Master Plan must be culled to fit the reserve's budget. Visitor facility selection criteria reflecting the objects and management principles of the NPW Act, as well as the strategies in the Plan of Management should be transparently applied to identify a list of recommended works that fits the budget. The final proposal then should be readvertised for public comment and review in a revised draft plan of management.

### **Protection of wilderness and remote areas**

The draft Master Plan proposals for facilities in wilderness and remote areas are opposed by Wilderness Australia.

The proposed formal walking track to and viewpoint at Mt McLean and the northern access road to Deep Pass fall into this category. The walking track proposal to Cape Horne is supported but the formal walking track to Mt McLean attracts visitors to very sensitive area and would cause significant environmental degradation of bushland. The Mt McLean area includes 'Star Gate Tunnel' which is surrounded by delicate rainforest vegetation likely to be damaged by visitors and the 'Plain of Shards', an exposed sloping ridgeline of sandstone rock covered in ironstone, which is also easily damaged.

The northern access road to Deep Pass is of long-standing, but it is a duplicate of a road to the south that can serve the Deep Pass camping ground.

### **Walking route options**

Wilderness Australia supports the proposed multi-day walking track loop options in the Master Plan that would assist inexperienced walkers to improve their bush skills. A multi-day walk from Ben Bullen to the existing route option at Lambs Creek can be readily achieved using Moffit Road, Baal Bone Road, and then via Gardiners Gap to Long Swamp. This or a similar route option variant would create three multi-day walking routes, instead of one, at little additional cost (see **Appendix B1**).

Use of walking tracks by horse riders or mountain bikes has been advocated by these users. Multi-use tracks are not supported as these cause user conflicts and walkers are unlikely to enjoy using such tracks.

Multi-use tracks tend to be convoluted, incomprehensible and annoying from a walker's perspective. Walkers prefer to follow ridge tops or chose the best combination of grade and distance between camping sites. Further, there are no suitable sites for camping with horses on the multi-day walking loop option. Several of the proposed campsites on the multi-day walk will be small, in confined valleys and fragile areas, like the upper Wolgan River valley, and Carnes, Lambs and Kangaroo Creeks. They are not suitable as camping sites for riders.

The multiple use by walkers, horse riders or mountain bikes of park roads is more compatible with users because of the width of the road and construction standards applied.

## **Commercial tourism ventures**

Gardens of Stone must remain protected in a permanent public reserve.

Wilderness Australia strongly objects to leases being negotiated in secret over park land and then being imposed as a fait accompli on parks through a weak and flexible plan of management process.

Wilderness Australia believes visitor management for national parks and reserves must be determined by transparent and public plan of management processes, not by confidential contracts and leases negotiated in behind closed doors for the benefit of private ventures.

### 'Wollemi Great Walk' component located outside the SCA

The draft Master Plan mentions a Wollemi Great Walk (pg 6, dMP). The Expression of Interest is for a multi-day walk in the Gardens of Stone State Conservation Area and states it is 'to compliment' this larger Great Walk project (pg 7, EoI). The draft Master Plan contains some details of the Wollemi Great Walk, including that the Wollemi Wilderness will provide a 'distant background' to the walk. Development of a Great Walk proposal for walking and cycling is through secret negotiations.

The Wollemi Great Walk should follow the BiCentennial National Trail (BNT), as multi-purpose use of the BNT is permitted in the plans of management for Gardens of Stone and Wollemi National Parks.

Wilderness Australia objects to a Great Walk within Gardens of Stone and Wollemi National Parks being part of any commercial negotiations for the Gardens of Stone SCA. Commercial-in-confidence discussions for the Wollemi Great Walk must not be for these national parks as the public has not had an opportunity to comment on this component of the Great Walk proposal.

The proposed Wollemi Great Walk would be enhanced by the addition of Nullo and Coricudgy state forests to Wollemi National Park. Wollemi Great Walk must not compromise the boundaries or integrity of Wollemi, the largest wilderness in NSW.

### The Wollemi Great Walk component inside the SCA

Currently EoI documents for the component of this Walk proposal inside the Gardens of Stone SCA ambiguously states it will be 'co-designed with the Successful Respondent in consideration of the conversation values of the reserve' [EoI FAQ page 3].

The Expression of Interest for the Wollemi Great Walk should not go into a second stage lease negotiation and contract process until public comments on the actual route proposed are considered.

The walking route options in the draft Master Plan indicate proposals for multi-day walking route options. These dMP route options only indicate that multi-day walk option is viable in the reserve, not where it will go. The multi-day walk with commercial accommodation facilities in the Gardens of Stone State Conservation Area requires public comment and review of a specific proposal.

National Parks and Wilderness Areas are permanently protected public assets. It is inappropriate for commercial interests to exploit them as the next development opportunity, especially without the public even having a say on a specific proposal.

Wilderness Australia recommends that the final route of the multi-day walk be indicated on a map in a revised dPoM that is then placed of public exhibition for comment and review. The notional route options in the dMP have already been relocated and will be refined in a dubious co-design process to benefit the commercial provider, so the routes on exhibition for comment are misleading.

**Appendix B** is a separate report on refining the proposed multi-day walking route options and is provided to assist the NPWS with the development of preferred routes.

#### Accommodation hubs

Wilderness Australia opposes the proposed Accommodation Hubs/glamour camps associated with the proposed multi-day walk.

The proposed Accommodation Hubs detract from the experience of nature and remoteness in the reserve, especially as these hubs require vehicle access. The proposed walking route is now in more remote bushland, further north than originally indicated, and it is unclear whether the proposed accommodation hubs shall be relocated, requiring a dPoM amendment to be advertised.

The revised draft Plan of Management should specify the multi-day walk as a public walking track, as this is currently unstated.

The best-sited camping grounds should be allocated to the intended market for the walk, inexperienced campers, as they are the future of national parks and nature conservation. Free walkers must not be given second rate camping sites, as has happened on the Light to Light walk in Ben Boyd National Park. Commercial interests must not privatise the best aspects of the reserve.

#### Adventure tourism

Wilderness Australia opposes an adventure theme park in this reserve due to the damage it causes to geodiversity and scenic values at Lost City.

The draft Master Plan did not undertake a site selection process for the proposed adventure hub. The proposed adventure theme park is located partly in a former Flora Reserve, a nature reserve equivalent reserve. The proposed adventure theme park would not be permitted in the former Flora Reserve. The purpose of reservation of a state conservation area under the National Parks and Wildlife Act is to produce improved conservation management of heritage values. The adventure theme park, which disrespects the former nature reserve status of Lost City and the conservation purpose of reservation.

The Lost City proposal is also a significant adverse precedent in visitor management of geodiversity in a NPWS reserve. Climbing was banned by the NPWS on that other scenic geological icon, the Three Sisters, partly due to the concerns of Traditional Owners. Abseiling down Mount Banks was banned by the NPWS due to impacts on scenic amenity when the mountain is viewed from lookouts across the Grose Valley. Now the NPWS is proposing a development that in terms of environmental impacts is far worse and local Traditional Owners are concerned about this proposed use (Central West Village Voice, 25 November 2022).

If this proposal were for any other development, say for a mine ventilation shaft, it would not be granted development approval. The Lost City Adventure Hub proposal is a cynical political decision that flies in the face of the objects and strategies of the dMP.

A basic site selection process would have avoided the former flora reserve site and separated the quiet enjoyment of the iconic Lost City view from the excitement of adventure tourism.

An alternative site, owned by the State Mine Museum, is on offer to the NPWS at a reasonable price. The upper parts of the State Mine Gully are owned by Lithgow Council or are vacant Crown land and can be transferred to the NPWS estate. Mountain Bike route options are already identified in the dMP through State Mine Gully.

The State Mine Heritage Park and Railway Museum lands could also be made available by lease, if the Museum Board so determined. The Museum Board could lease its lands for a Mountain Bike Hub, and for adventure facilities. The forested and pagoda-studded State Mine Gully is more accessible, being serviced with a sealed road and a hard stand already exists at Dobbs Drift. With these advantages, the commercial hubs could permit a third lease for a pop-up Coffee Shop to be established. These arrangements would establish previously unimagined visitor potential for the Museum, making it a significant tourism attraction, “History World”.

### **Adventure Hub — site capability comparison**

<b>Lost City</b>	<b>Vs</b>	<b>State Mine Gully</b>
10.6km dirt road connects zipline start and landing decks, slow client turn around		2.4km road (1.4 sealed) connects zipline start and landing decks rapid client turn around
200m elevation between start and landing decks		166m elevation between start and landing decks
Badly damaged by wildfire unsuitable for tree tops adventures		Forest not damaged, so is suitable for a tree top rope adventure
Decommissioned dam unsuitable for adaptive reuse		Dobbs Drift mine portal site suitable for adaptive re-use
8.9km from Lithgow Station to landing deck		4.8km from Lithgow Station to landing deck all on a sealed road
5.9km from State Mine Museum to landing deck		1.7km from State Mine Museum to landing deck
Former Lost City Flora Reserve (nature reserve equiv.) now SCA res		State Mine Museum freehold (C3 env mgt), <b>on offer</b> to NPWS by Museum Board
Remote from water, power and sewer		1km from water and power services; sewer?
Adventure hub incompatible with Lookout and blights iconic views of Lost City’s geodiversity; disappointing viewers		Adaptive reuse of former mine site is compatible with protection and mgt of mine heritage values and fits with views of Lithgow in distant background
Development does not tie directly with Lithgow, visitors will return home by Old Bells Line of Road		Development would be tied to Lithgow, visitors will return by State Mine Gully Road to Lithgow town centre by sealed roads
Not associated with mountain bike network		Associated with mountain bike track network as currently proposed
No potential to tie leases with State Mine Museum		Potential lease revenue for State Mine Museum include adventure park, mountain bike tracks and café
		Potential to create a tourism hub - <b>History World</b> at State Mine and Rail Museum with mining and trade union themes (banners from the 1890s) with standard gauge rail spur line connection

Importantly, provision of infrastructure for an Adventure Theme Park at **Lost City** will be more expensive than at State Mine Gully due to its location being remote from infrastructure.

NSW Government commitments may require the NPWS to chip in a lot more than they would like, to make sure these commercial activities are established. **This will greatly reduce how much of the Master Plan for visitor facilities and access will be achieved.**

### **Vehicle Access**

Trail bikes and 4WD vehicles have caused much damage to this reserve.

Wilderness Australia recommends that access arrangements for these users be restricted to a minor provision of approved 4WD roads where vehicles use can be managed sustainably and at low cost, as defined on the plan of management's map.

#### Management of Old Bells Line of Road

The draft Master Plan should not establish an eastern entrance at Clarence or propose visitor attractions off the Old Bells Line of Road, the lookouts at Bald Trig, Farmers Creek dam and Bungleboori Creek South.

Entry by this road from Clarence in the east, would mean that most visitors who use this road will by-pass Lithgow, defeating the tourism objective of the dMP.

On Old Bells Line of Road is a large, ugly quarry. This entry is a poor visitor experience. Any sense entering into an important natural area is lost from passing heavy trucks and impact of the first expansive view being a large, ugly sand quarry.

If Old Bells Line of Road cannot be closed to the public, Wilderness Australia recommends installation of a prominent heavy truck warning sign at Clarence that also directs visitors to enter the reserve by Lithgow. The sign is justified by the threat heavy trucks use of this narrow, winding dirt road poses to visitors, especially those inexperienced with driving on dirt roads.

#### A 2WD vehicle tourist road loop centred on Lithgow is essential

Wilderness Australia disappointed that the Master Plan doesn't propose a 2WD loop road with Lithgow at its hub. Such a touring route is achieved by upgrading Maiyingu Marrragu Road to a standard suitable for 2WD vehicles. This 2WD touring road loop better associates Lithgow with the pagoda attractions serviced by the visitor infrastructure, while retaining the more remote areas of the new reserve in an undeveloped state. It builds Lithgow's pagoda landscape brand. It connects Maiyingu Marrragu Aboriginal Place with this 2WD tourist road loop. This tourism loop also ensures visitors driving 2WD vehicles do not return home by the Old Bells Line of Road, as they would otherwise.

Under the currently proposed road access, the visitors driving 2WD vehicles won't drive on Maiyingu Marrragu Road to access the Temple of Doom, and Wolgan Falls and Wolgan Gorge lookouts. Servicing these iconic visitor attractions with a 4WD road is a poor investment because only half the reserve's future visitors can then access these sites. Further, the proposed walk to Wolgan Falls has located a trail head on a technical 4WD road (Fire Road No 5). Visitors on foot would be displaced from the road by high-powered, raised 4WD vehicles driving the Spanish Steps circuit.

Crowding is already a problem at the Glow Worm Tunnel attraction and will become more so when re-established as a 2WD road. The above 2WD Maiyingu Marrragu Road visitor loop addresses crowding by providing three alternative quality scenic attractions, which can be accessed from Lithgow.

## **Conclusions**

The draft Master Plan is really an aspirational scoping document for a broad range of visitor uses. The wide range of visitor facility and access proposals in the draft Master Plan will raise excessive stakeholder expectations. User groups are likely to be disappointed with the facilities that are provided in the reserve.

As a scoping document the draft Master Plan can help to set 'a long-term framework' for visitor use as proposed in the Overview on page 8. Development of this framework requires defining a scheme of operations through setting priorities, applying the strategies and objectives in the draft Master Plan, as well as the Management Principles for SCAs specified in the NPW Act.

This framework should be incorporated into a revised draft plan of management for the Gardens of Stone State Conservation Area, minus the commercial accommodation, adventure theme park, and sport-style 4WD vehicle tracks. The extensive network of downhill bicycle tracks should be reviewed to create gravel road riding opportunities for the region, rather than duplicate the Hassans Wall downhill facilities.

The heritage values of the Gardens of Stone SCA are the attraction for visitors and tourists. The narrow focus on a tourism growth objective has resulted in locating a proposed major adventure theme park where it degrades Lithgow's primary scenic attraction, the spectacular Lost City pagoda complex. Ruining this view and making the reserve's gateway a large ugly quarry on a road bypassing Lithgow ensures that the reserve can deliver only a fraction of its potential benefit to Lithgow.

To secure the projected revenue and employment benefits, the adventure theme park must be relocated to State Mine Gully, and vehicle access management adjusted to make Lithgow the tourism gateway. Otherwise, Lithgow will be known as a destination to be avoided that disrespects and ruins its internationally significant heritage.

## **Recommended actions**

- Re-exhibit a concise, and spatially defined scheme of management operations for the reserve in a revised draft Plan of Management, informed by public comment on the draft master plan
- Provide opportunities for Traditional Owners to care for and share Country through reserve management, including through economic opportunities and employment
- Significantly reduce past use impacts by undertaking environmental restoration during development of visitor facilities and road upgrades
- Use the Biodiversity Offset Funds for better conservation management of national heritage and not for general park management operations
- Continue to ensure pine wildings are controlled in and around the former pine forest
- Prohibit use of vehicles off roads, including motorised trail bike riding on single track
- 4WD vehicle access should be restricted to a minor provision of approved 4WD roads where vehicles use can be managed sustainably and at low cost

- There should not be an eastern entrance to the reserve from Clarence using the Old Bells Line of Road
- There should be no visitor attractions off the Old Bells Line of Road, including at Bald Trig, Farmers Creek dam and Bungleboori Creek South
- Install a prominent truck hazard warning sign that alerts visitors that the Old Bell Line of Road should be avoided and to access the reserve by State Mine Gully Road via Lithgow
- Create a 2WD tourist loop road with Lithgow at its hub by upgrading Maiyingu Marragu Road to a suitable standard
- Make Sunnyside Ridge Road should be suitable for 2WD vehicles to the Birds Rock lookout carpark to permit all reserve visitors to enjoy the extensive views from Birds Rock
- Shorten the Birds Rock turnoff road to a carpark at the forest edge
- Make Fire Trail No 5 part of a walking track to Wolgan Falls by closing this road to 4WD vehicles
- Wolgan Gap viewpoint should not be promoted as there is no parking site possible
- Negotiate 2WD vehicle access to Baal Bone Gap from west through former mining area and provide vehicle barriers along route to protect sensitive grassland areas from damage
- Locate the adventure tourism hub in State Mine Gully, and the NPWS should acquire the State Mine Gully land on offer to it or sponsor lease negotiations between the museum board and commercial operators of the adventure hub
- Integrate State Mine Heritage Park into the visitor management experiences for walking, adventure and bicycling on State Mine Gully land either through lease to service provider or through its purchase by the NPWS
- Lost City lookout at Marangaroo Creek South should be the main visitor hub in the reserve presenting superlative pagoda landscapes
- Visitor facilities that provide opportunities to view natural scenery and heritage values should be achieved without buildings, facilities or visually prominent vehicle use in the view, for example 4WD vehicle access to the Lost City 2 must not extend beyond the forest onto montane heath
- Provide gravel cycle touring opportunities using existing forest roads
- To protect wilderness and remoteness, omit the proposed formal walking track to and viewpoint at Mt McLean and the northern access road to Deep Pass
- Convert road to Cape Horne to a walking track
- The proposed multi-day walking track loop options should be designed to assist inexperienced walkers and campers improve their bush skills
- Extend the multi-day walking loop route from Ben Bullen to Coxs River headwaters by way of Moffits Road, the Great Dividing Range, Gardiners Gap and Long Swamp, as this will then create three different multi-day walks at little expense
- Promote Zig Zag Railway Station as an exciting entry point for walkers commencing a multi-day walk using the existing walking track to Farmers Creek
- To encourage inexperienced walkers, the multi-day walk should provide walking tracks and camping sites at no charge to users
- Walking tracks should not be located on fragile montane heathland with shallow soils
- Walking track and Mountain Bike track networks must not traverse long lengths of the ecotone beside nationally endangered swamps
- To aid effective and efficient reserve management, all vehicle-based camping should be at Forest Camp
- The dams at Forest Camp must have rubbish and broken bottles removed from them before they are safe for swimming

- Walking tracks and associated camping sites should not be used by horse riders or mountain bikes
- Accommodation Hubs/glamour camps should not be associated with the proposed multi-day walk within the reserve
- To retain the natural character of the reserve and especially Forest Camp, major events should have a maximum of 500 people and no more than four major events should be held a year
- Accommodation Hubs associated with the Wollemi Great Walk should be located on private land
- The Wollemi Great Walk must avoid the Wollemi Wilderness
- Add Nullo and Coricudgy state forests to Wollemi National Park
- Close the technical Spanish Steps (Fire Road No 5), the “Big Dipper” Pass east of Baal Bone Gap (Baal Bone Fire Road), and the 4WD link road between Lost City Ridges 1 and 2 due to on-going environmental damage by 4WD vehicle use; the provision of skill graded trails is inappropriate in a NPWS reserve

Thank you for the opportunity to comment.

Yours sincerely,



Keith Muir O.A.M.  
Hon. Project Officer  
Wilderness Australia

## Appendix A

### Specific comments on particular sections of the draft Master Plan

Page 6,

**Wollemi Great Walk**, Paragraph 1

Support walk Wollemi Wilderness providing 'distant background' to this experience.

Expressions of Interest from commercial parties must not determine amendments of Wollemi and Gardens of Stone plans management. Park plans of management must continue to determine reserve management, not leases or contracts.

Page 8 **Overview Paragraph 3**:

Comment: The draft Master Plan should be considered a one-off process to address the unique set of Gardens of Stone SCA visitor management circumstances.

Section 72AA(4) of the National Parks and Wildlife Act requires that the scheme of operations (SOO) is enshrined in the plan of management. In order to comply with s.72AA(4) the final scheme of visitor access and facilities should go into the adopted plan of management and not the Master Plan.

Page 8 **Summary of Proposals**

To create a 2WD vehicle tourist road loop that starts and finishes at Lithgow amend dot point 11 to read:

... 'via State Mine Gully, Maiyingu Marrragu Road and Glow Worm Tunnel Road.'

Amend dot point 19:

Rename the Wollemi Great Walk, the 'Gardens of Stone Multi-day Walk', and consequential amendment of dot point 20 ... 'connections to Gardens of Stone Multi-day Walk'.

Amend dot point 24:

'Provide a destination adventure activities facility at State Mine Gully on land owned by the State Mine Museum and Heritage Park.'

An Adventure tourism hub at Lost City is a second-rate solution, causing significant visual impact. Lost City is Lithgow's most scenic attraction and was partly protected by a Flora Reserve. Lost City should not be degraded when nearby scenic attractions at State Mine Gully provide a better tourism fit. State Mine Gully provides greater added value with visitation to the museum, and use of quality access roads ensuring economic and community benefits are greater and far less visual blight.

Page 9 **figure 1, Infrastructure Master Plan**

**Omit** Old Bell Line of Road from the Infrastructure Master Plan.

**Make** narrow Old Bell Line of Road to a virtual dedicated truck haul road by installing prominent heavy truck warning sign at Clarence. Such a sign will save the lives of several tourists inexperienced in driving on 2WD dirt roads. This sign should also direct Gardens of Stone tourists and visitors into Lithgow.

**Remove attractions that are accessed from the Old Bells Line of Road** as these will weaken Lithgow as the gateway to GoSSCA. **Remove** the Farmers Creek Dam walk, Bald Trig Lookout and Bungleboori South lookout destinations from Figure 1.

**Upgrade** Maiyingu Marrragu Road to create a 2WD road loop road centred on Lithgow with scenic attractions branching off it so that any Sydney family with a motor vehicle may enjoy the Gardens of

Stone wonderland. This 2WD road link with Lithgow ensures visitor use of the reserve can provide the most benefit to Lithgow.

**Support** conversion of 4WD road to Cape Horne to walking track.

**Remove proposed Mt McLean formal walking track and lookout** from Figure 1 as this virtual wilderness is very fragile (e.g. the Plain of Shards is covered in weathered pagoda rock fragments that are easily damaged. State Gate Tunnel is surrounded with sensitive rainforest vegetation vulnerable to trampling). The Mt Mclean vicinity should be kept quiet and walking access should not be formalised.

Page 10 and 11, **Easy Reference Guide to the Master Plan, steps s1 to s5:**

The five sequential steps of the development of the draft Master Plan are a sound approach, but this is *not* how this plan was developed. The Lost City adventure hub, and various walking, vehicle and bike access arrangements were inserted into the draft Master Plan with little or no consideration of the steps outlined or the objectives and strategies that are supposed to guide these steps.

Page 11, **Easy Reference Guide to the Master Plan, Figure** bottom right:

The draft Plan of Management should be readvertised once informed by the *draft* Master Plan.

Page 20, **Scenic Amenity** Marangaroo Creek Headwaters

Lithgow will have its best scenic asset cancelled by horizontal ziplines cutting across it, and blighted by facilities at its base. Ruining this world class view of internationally significant pagoda values will demonstrate that Lithgow can never be a tourist destination. Relocate these adventure hub facilities.

Page 20, **Scenic Amenity, Landscape types**, last dot point:

Comment: Areas with 'vegetation ... of low stature' are sensitive to soil disturbance. These locations are visually prominent and best avoided by tourism development, including walking tracks.

Page 21, **Viewing points and lookouts:**

Add a third dot point: **Upland swamps** are strong visual elements offering extensive views downstream as well as across the swamp into the surrounding woodlands.

## **2.4 Recreation and tourism**

Page 22, **Vehicular access:**

Add a new dot point three: Lithgow is 5 minutes drive from Dobbs Drift and State Mine Gully. Make Dot Point 3, dot Point 4.

Page 23, **Bushwalking:**

**Dot points 1, 3 and 4 are supported. Dot point 2 is opposed.**

Omit dot point 2 should be outside the scope of the draft Master Plan and the Gardens of Stone SCA. Dot point 2 creates expectations not governed by existing plans of management or this management planning process. Such speculation in the context of the parallel commercial Expression of Interest for a Wollemi Great Walk passes control of this walk proposal to commercial interests. The public has no formal opportunity to respond to this proposal that could potentially impact on the Greater Blue Mountains World Heritage Area and the declared Wollemi Wilderness.

Page 23, **Destinations figure:**

**Remove** Mt Mclean viewpoint from figure due to its sensitive remote condition. Mt Mclean is mostly in the Gardens of Stone National Park.

### **Destinations, dot point 5:**

Strongly support termination of motorised trail bike riding as it is not sustainable on single track within the reserve. Only registered motorised trail bikes on approved public and park roads as shown on the plan of management map should be permitted.

### **Page 25, Planning Strategies:**

**The Principles, Objectives and Strategies must be enshrined in the plan of management.** Those who read and consider the draft Plan of Management and the draft Master Plan become confused by two sets of strategies and objectives. There should only be one set of strategies and objectives and the NPW Act require these need to remain in the statutory plan.

### **Page 26, Park Planning Principles**

#### **Environment and habitat – management principle wrongly constructed**

The draft Master Plan, even if it were a statutory instrument, cannot reconstruct a statutory principle.

Dot point 3 *Sustainably balance* of environmental values with an ongoing recreation role for the park is contrary to the Management Principles for a State Conservation Area. The principle has the wrong legal construction of this park management principle. Visitor and tourist use must be *compatible with* the conservation of the state conservation area's natural and cultural values and with uses permitted under other provisions of this Act in such areas (see s.30G9(e) of the NPW Act).

#### **Visitation**

The development of iconic visitor experiences must align with the management principles for state conservation areas, as set out in section 30G(e) of the NPW Act as stated above. Building prominently located adventure tourism facilities on the Lithgow's best scenic attractions, degrading the reserve's scenic amenity is not compatible with conservation of these scenic values and so is not compliant with the management principles in the National Parks and Wildlife Act, 1974.

One reason for these legislated management principles is to ensure 'captain's calls' do not wreck the values of national parks and reserves. The adventure tourism proposal at Lost City damages the reserve's values that is also outstanding tourism asset. A damaged heritage asset will not sustain visitation as the Gardens of Stone will be known as a reserve degraded by tourism development, as well as past use. Tourism must respect heritage values, otherwise the assets even from an economic point of view, decline.

Over time a commercially operated attraction usually develops further assets to increase cash flow, but this is a slippery slope that leads to further degradation of scenic values. Once heritage values are degraded, further capital investment may not yield a return.

Page 27, **4WD vehicle access** must be kept to approved roads indicated on a map in the plan of management.

A reference in the Master Plan to the development of 4WD access and use being compatible with the heritage values of the reserve needs to be stated (c.f. the visually intrusive access to ridge to Lost City 2 and need to protect scenic amenity).

**Bushwalking experiences** – These principles are generally supported. A reference to the development of walking tracks being compatible with the heritage values of the reserve needs to be stated. All uses have environmental impacts and these need to be mitigated, for example, by the avoidance of endangered species habitat, platey pagodas and cultural sites.

**Multi-use tracks will not work** for the Gardens of Stone State Conservation Area because of the confined nature of routes with narrow confined, highly erodible passes with sandy soils. On the proposed multi-day walking track, multiple use is further prevented by limited camping opportunities.

Page 28, **Mountain Biking** –

Add a reference to the development of mountain biking tracks needing to be compatible with the heritage values of the reserve.

Add a dot point on gravel bike touring opportunities:

‘Replication in the state conservation area of the downhill mountain biking at Hassans Walls reserve that adjoins Lithgow to the south is unwarranted. More gravel bike touring opportunities will be provided as opportunities are currently limited in the Lithgow region.

Page 28, **Adventure experiences and tourism:**

A reference to the development of adventure experiences and tourism being compatible with the heritage values of the reserve needs to be stated. Damaging Lithgow’s prime scenic attraction of Lost City is not compatible with heritage protection, especially when an alternative exists.

Artificial thrill-seeking rides and activities at an adventure theme park should be provided on adjoining State Mine Museum land at Dobbs Drift, not in the conservation area at Lost City.

### **Camping**

Shared camping between the user groups on multi-day walks will not deliver good experiences for campers, especially as horses can degrade large areas. Horses that use sandstone-based camping sites will quickly reduce these areas to bare earth covered in horse manure, degrading visitor enjoyment for others.

Page 30, **Geology Add Strategy:**

Add Strategy dot point: Avoid walking track location over sensitive platey pagodas.

Add Strategy dot point: Avoid walking track location over areas with erosion prone or skeletal soils. Walking tracks need to be compatible with the heritage values of the reserve.

Page 33, **Water Management Strategies:**

Dot Point 4: Comment on application of this strategy:

Application of this sustainable 4WD access strategy requires closure of the Spanish Steps and the “Big Dipper” Pass east of Baal Bone Gap onto the Great Dividing Range.

The proposed technical 4WD link road between Lost City Ridges 1 and 2 should not be constructed. The 4WD users of these kinds of routes do want roads resilient to damage, but rather mud and erosion gullies. Such technical 4WD roads have no place in a conservation area as they degrade the natural environment. Such activity is not compatible with the conservation of heritage values.

Dot Point 7: Comment on application of this strategy:

Several swamps are ruined and need to be managed as sites that will evolve into future dry land ecosystems. Once the aquiclude underlying a swamp is fractured, the near-surface groundwater drains away. No successful rehabilitation to restore near-surface groundwater is possible and many millions have been wasted trying to achieve that outcome by mining companies in the southern metropolitan water supply catchment area. Consult with Dr Ann Young on this matter, if you are in any doubt that this is the case.

Page 35, **Habitat Management Strategies**

Dot point 7, **Avoid facilities in areas of low vegetation**

Comment: The sense of freedom experienced from remoteness is in inverse proportion to the development of buildings and facilities in areas that offer broad views. Proposals for glamor camps and lookouts in remote bushland areas with low vegetation that provide sweeping views are inappropriate. The illustration of accommodation units in the Expression of Interest is exactly what should not be done if a sense of remoteness is to be retained in this reserve.

Dot point 8: The remediation works are currently regulated by the Statement of Management Intent. The proposal to develop a staged approach to remediation of plantations areas starting in the medium to longer term contradicts the work commissioned by Statement of Management Intent. Restoration of the former pine forest should be part of on-going work when the plan of management is adopted.

Dot point 9: Pine wildings are controlled under the Statement of Management Intent and should be part of on-going work when the plan of management is adopted.

Dot points 9 and 10, as examples,

Comment – Plan of management strategies should prevail:

The draft Master Plan wanders off visitor management and dabbles in other strategies, such as those for habitat management. The consultant authors of this report are not expert in native habitat management. These remarks should be omitted as they replicate strategies in the draft Plan of Management and cause confusion.

Page 36, **Cultural heritage: Wiradjuri**

**Objective dot point 5 and Strategy 5 and 6:** The intention that the Master Plan integrate cultural narratives and Designing with Country into management is supported by Wilderness Australia. The draft plan of management should incorporate these objective and strategy recommendations.

Wilderness Australia supports the aspirations of Traditional Owners to care for and share Country and Aboriginal culture. Further consultation and formal endorsement by the Aboriginal community are recommended along the lines proposed in the draft Plan of Management. A revised draft Plan of Management needs to be exhibited that details the specific works and actions recommended by the Aboriginal community, in accordance with agreed objectives and strategies.

Page 38, **Scenic Amenity and Figure 5, Objectives** dot point 4:

Visitor facilities that provide opportunities to view natural scenery and heritage values should be achieved without buildings or visually prominent vehicle use in the view. The proposed adventure hub and built facilities below Marrangaroo Creek South Lookout is in the viewshed and so degrades the visual asset it seeks to exploit. The visually prominent 4WD road proposed on the Lost City 2 ridge would allow vehicles parked there to be seen for kilometres, including at Marrangaroo Creek South Lookout. This 4WD road must be shortened so vehicles are not in the viewshed.

Page 37, **Cultural heritage: historical**

The State Mine Heritage Park is illustrated by a figure but is not adequately considered in the draft Master Plan.

The Wilderness Australia proposal to relocate the Adventure Hub to State Mine Gully enables better integration of historical objectives and strategies with the overall visitor use, adding to the proposed bicycle single track already proposed to be located in this gully.

Locating leases for adventure, as well as bicycle facilities already proposed on museum land in the State Mine Gully, would facilitate greater visitation to the museum. The NPWS could either purchase this land or assist the Lithgow community and sponsor lease negotiations between the museum board members and commercial operators. The subsequent lease rental(s) would then flow to the museum, in addition to the increased visitation. In any event, the proposed bicycle facilities on State Mine Gully land would require a lease, so an additional lease for adventure facilities is only a marginal additional step.

An alternative proposal of perhaps locating a NPWS works depot at Dobbs Drift in State Mine Gully would be a poor use of this historic location and return few benefits to the community.

#### Page 38, **Scenic amenity**

##### **Strategies 1, 2 and 3:**

All new facilities are to be carefully located etc ... these strategies have been ignored at Lost City and by the Tourism EoI proposals indicated by the proposed figure showing accommodation glamping tents in a broad viewshed.

##### Figure 5 **Scenic amenity management strategies**

Remove 4WD road on Lost City 2 spur as vehicles parked there can be seen for kilometres.

##### Figure 5

Remove Mt McLean panoramic views icon as location is too remote. Mt McLean is mostly in Gardens of Stone National Park.

##### Figure 5

Remove Bungleboori South LO, Bald Trig LO and Farmers Creek Dam LO as these locations are accessed off Old Bells Lines of Road that will draw visitors away from Lithgow and require visitors to drive past a large, ugly quarry.

##### Figure 5

Remove Spanish Steps 4WD road as aggressive, high-powered 4WD vehicles would discourage other visitors from walking to iconic Wolgan Lookout.

#### **Scenic Amenity Lookouts** Page 40

##### **Strategies**, dot point 5,

Lookouts should not be developed in isolated locations. Remotely located lookouts will defeat the tourism strategy of associating visitor facilities with Lithgow. As previously stated omit Mt McLean that is mostly in Gardens of Stone National Park.

The proposed Bungleboori South LO, Bald Trig LO and Farmers Creek Dam as these locations draw visitors away from Lithgow.

##### Pages 40-41, **Strategies**, New dot point:

Include vistas of pagodas (smooth and platey types), forest (various types), swamp, cliff, canyon and valley to ensure a diverse range of lookout opportunities are offered to visitors.

Page 41, **Specific Lookouts, State Mine Gully and Lost City precinct**: specifications do not tally with proposals shown in EoI. Iconic views at Lost City can't be enjoyed when blighted by an adventure theme park development.

Views at Dobbs Drift Lookout are partly cultural, as there are distant views to Lithgow township and of Dobbs Drift (a mine adit). The visual blight of the proposed adventure theme park development

will be somewhat less, due to past use impacts. The State Mine Gully site can be considered an adaptive reuse of this site.

Specific Lookouts, **Carne Creek Lookout (Southern) point a.**, (and Fig 6, Page 40)

This proposed lookout is in Gardens of Stone National Park requires a bridge over upper Carne Creek for 'access by walking track extension from Forest Camp Loop walking track'.

Recommend an alternative lookout be provided closer to the Forest Camp on the proposed loop walking track.

Specific Lookouts, **omit Bungleboori South Lookout and Farmers Creek Dam Lookout** due to diversion of visitors who use Old Bells Line of Road from Lithgow.

Page 41 Specific Lookouts, **Baal Bone Gap** 4WD vehicle access to parking area is impassable when approached from the south due to "Big Dipper" pass and a large swamp quagmire at bottom of that pass on Baal Bone Gap Trail and also from the west by a large quagmire on Moffits Trail.

Page **42 Orientation and Wayfinding Objectives**: dot point one,

Omit the term 'seamlessly deliver connections' that does not explain relationships to user groups. Insert instead: 'Provide communications to enable diverse user groups to quickly orientate themselves within the Gardens of Stone SCA.'

**Arrival Orientation and way finding Objectives, all dot points,**

Comment: Driving on Old Bells Line of Road through a large, ugly quarry and dodging 5 axle trucks with dog trailers cancels these objectives and will significantly diminish the number of return visits. This entry road will facilitate a first impression of the reserve as a degraded landscape, and due to these perceptions, may cause the reserve to drift towards past visitor misuse and damage by off road vehicles.

**Arrival orientation Key Consideration**: dot point 3: the first extensive vista visitors will see is a large, ugly sand quarry. This visual blight nullifies the objectives of arrival orientation of coming into County.

**Figure 7, Clarence – Omit Arrival Hub at Clarence –**

**Information Point**: Install a prominent track hazard warning sign that alerts visitors that the Old Bell Line of Road should be avoided by reserve visitors. The sign's purpose is to save the lives of tourists inexperienced in driving on dirt roads with trucks, and to direct all Gardens of Stone tourists and visitors into Lithgow.

Figure 7,

**Omit Main Entry Point north of Clarence**, divert visitors to Lithgow instead.

Figure 7,

**Omit Orientation Point to Bunglebouri south lookout**, do not encourage use of Old Bell Line of Road that diverts visitors from Lithgow.

Page 43, **Arrival Orientation Strategies, dot point 9 addition point:**

**Integrate State Mine Heritage Park** into the visitor management experiences for walking, adventure and bicycling on State Mine Gully land either through lease by service provider or as a result of purchase by the NPWS.

**Arrival Orientation Strategies, insert new initiative**: Install prominent warning sign at Clarence warning that Old Bell Line of Road is a truck haul road and advise all Gardens of Stone tourists and visitors to go by Lithgow.

**Arrival Orientation Strategies, addition point:**

Discourage use of Old Bells Line of Road due to safety concerns.

Page 44, **Vehicular Access, Objectives**, dot points 3 and 4: are defeated by the experience of a large ugly quarry on Old Bell Line of Road.

**Vehicular Access Strategy**, figure 8:

Wilderness Australia strongly supports closure of road to Cape Horne and its conversion to a walking track.

Maiyingu Marragu Trail must be a 2WD road to create a 2WD tourist loop road with Lithgow at its hub. All tourists and visitors can then use Maiyingu Marragu Road to enjoy additional visitor opportunities that relieve pressure on the over used Glow Worm Tunnel attraction.

Page 45, **Vehicular Access, Strategy**:

Maiyingu Marragu Trail must be upgraded a 2WD vehicle standard road to create a 2WD tourist loop road with Lithgow at its start and completion point. All vehicle owners can then access Temple of Doom, Wolgan Gorge, Wolgan Falls and Maiyingu Marragu Aboriginal Place by this loop road.

**Vehicular Access, Additional Strategy**:

Long Swamp, Ben Bullen and Moffit trails provide the primary 4WD tourist loop road with Lithgow at its start and completion point.

**Vehicular Access, Strategies, point 14,**

Curtail 4WD vehicle access to Lost City 2 ridge to the west of Lost City LO to comply with this strategy, as it is a visually prominent ridgeline and such use will blight views from the proposed iconic Lost City lookout at Marangaroo Creek South.

Page 45, **Vehicular Access, Strategies 4WD recreational Access, point 20**: The Baal Bone/Gap Road is impassable at "Big Dipper" pass, due to major quagmire and large sandstone step. The former will be expensive to remedy. Another impassable quagmire is located on Moffit road west of the Gap.

Page 45, **Vehicular Access, Strategies 4WD recreational Access, point 21**: Proposed skilled 4WD road across Marangaroo headwater tributary is inappropriate because this subcatchment is currently not degraded. Also, continued use of Spanish Steps at is odds with proposals for a walking track and lookout at Wolgan Falls. Skill graded 4WD access is a motor sport not nature-focused visitor use. Access works for a motor sport are contrary to the management principles of a state conservation area and so not permitted under the NPW Act.

Page 46: **Bushwalking and pedestrian access, Objectives** and Figure 9

Options for Multi-day Walks and Short Loop Walks: Although apparent from the examination of Figure 9, insert addition dot point:

'Provide a diverse number of shorter walks and loops by intersection of the Multi-day walk with park roads.' This was considered in the development of the multi-day walk.

Page 46: **Bushwalking and pedestrian access, Key Considerations**

Additional dot point: Multi-use tracks (shared by walkers, cyclists and horse riders) are unsuited to the Gardens of Stone SCA due to visitor safety issues with narrow tracks in confined passes on most routes, limited space at available campsites, the need for walkers to travel directly between camps, and the erodibility of sandstone soils.

Page 46: **Figure 9 Options for Multi-day Walks**: Proposed route options are notional and need to be revised in line with further investigation.

**Additional Key Consideration: Farmers Creek as an additional walkers entry point from Zig Zag Railway Station** and an exciting entry for walkers commencing a multi-day walk and should be promoted. It is a romantic start point with views of the Zig Zag railway.

**Important Additional Key Consideration: In order to encourage use by inexperienced walkers, walking tracks are to remain publicly available at no cost to users.**

Page 47, **New Key consideration:** An important visitor opportunity for Gardens of Stone SCA is to enable inexperienced walkers to become more competent in navigation and use of minimal impact bushwalking practices. The provision of an on-line app or short videos that provides learning opportunities would assist inexperienced walkers on the proposed multi-day walk to gain these skills.

Page 47, **Amend Dot point 5 to apply to Gardens of Stone SCA only:**

The proposed strategy 5 must be limited to the Gardens of Stone SCA so that commercial in confidence legal arrangements do not determine future reserve management outcomes for the multi-day walk in the adjoining World Heritage Area.

A lease before management plan approach is hostile to protecting the public interest in national parks being managed for nature. Development of a lease agreement for accommodation facilities would make the subsequent draft plan of management amendments to permit these activities a rubber stamp. It would make the public's World Heritage listed national parks an exclusive development opportunity for private investors.

Page 47, **Amend Dot point 12:** Only former roads and closed reserve management roads are appropriate to be shared between walkers and cyclists.

Comment: Single track is too narrow to be appropriate for shared use and multi-use will suppress pedestrian use, which may otherwise to be majority visitor use of a track.

Page 47, **Add new Strategy:** Develop an on-line app to train inexperienced walkers to become more competent in navigation and use of minimal impact bushwalking practices.

### **Mountain biking and cycling access**

Page 48, MTB and cycling access, **Objectives**, dot point 1:

Omit "premier recreational cycling precinct" insert "a recreational cycling precinct" instead.

Comment: "Premier recreational cycling precinct" raises too much expectation and the reserve is actually a premier scenic attraction and bushwalking destination.

Comment: NSW, the Blue Mountains and Lithgow have an adequate number of downhill MTB tracks. Gravel riding needs to be emphasised in bicycle access management as it is more appropriate for this reserve, and compliments other bike riding opportunities.

Comment: The MTB track options have been developed by a commercial partner but this report has not been made publicly available. I have never seen a report for bike tracks that did not claim a particular site was the most important site for bikes. Such claims should not influence the draft Master Plan without public scrutiny of the contracted cycling proposal report.

**Key considerations**, dot point 1: MTB riding access to Newnes should be by the Old Coach Road. Under no circumstances should MTB be allowed to ride through the Glowworm Tunnel or along its walking track.

**Key considerations**, dot point 2: Only former vehicle roads are appropriate to be shared between walkers and cyclists. Single track too narrow to be appropriate for shared use. There is a fundamental conflict in the form and functions of the walking and riding tracks. Walkers tend to walk directly along spurs, clifflines, creeks and ridges on narrow paths, while bike paths need wide flowing paths to be of less environmental impact and more fun to ride on.

Page 49, **MTB and cycling access, Strategies, point 1**: Development of a MTN bike hub on State Mine Heritage Park Museum land at State Mine Gully is supported and should be augmented by relocation of the Adventure hub from Lost City. This would generate significant visitation to the museum, that would then become viable as a destination, a 'History World' with mining and trade union themes. This would strongly tie Lithgow's tourism future to its traditions.

**Strategies, point 7**: e-Bikes would require power, at Forest Camp for example, unclear if that is proposed. Need to be clear where power and other infrastructure is proposed other than at the State Mine Heritage Park.

**Strategies, point 8**: The southern section to the former pine forest is less viable and the section from the Old Coach Road to Newnes is very steep. The Rail Trail must not use the Glowworm Tunnel track as it is used by walkers.

The proposed Rail Trail would require significant funds to build from Newnes Junction (on the Main Western Railway line) to Newnes. The section from Newnes Junction to the former pine forest requires several new rail bridges over creeks and extensive clearing of large trees on several kilometres of embankments and cuttings. A rail trail from Lithgow to Oberon on the old Oberon spur line easement would be more viable.

**Page 50, Adventure Tourism, Objectives: dot point one:**

Comment: Wilderness Australia supports adventure tourism being required to be sympathetic with the natural surroundings.

What is proposed both in the Commercial Expression of Interest and on pages 64 and 65 of the draft Master Plan *is hostile to* the natural surroundings and will ruin Lithgow's most scenic asset.

Wilderness Australia believes the proposed development is not a sustainable attraction as it blights this superlative view and will disappoint future visitors who come expecting to see an unspoilt natural wonder, not an adventure theme park. Better visitor management is achieved by relocation of adventure tourism away from Lost City.

**Objectives: dot point three:**

Comment: Placing power, waste and water infrastructure into the Lost City view will be additionally intrusive, along with vehicular access to the base of the hill below Lost City that will be necessary to establish the adventure theme park.

**Objectives: dot point four:**

Comment: The very young, old and weak won't be using a zipline, flying fox or a via ferrata ladders. It would be better if thrill-based activities are placed at nearby Dobbs Drift on State Mine Heritage Park land than in Lithgow's best view. The Lost City should be enjoyed from an architect-designed major lookout structure that is tucked into the forest landscape. Making the State Mine Heritage Park at Dobbs Drift an adventure destination has the added benefit of tourists being more likely to visit Lithgow than to return home by Old Bells Line of Road.

The implied assertion of adventure theme park development in an NPWS reserve is that nature isn't good enough. The peer reviewed research that supports this assertion has not been published to justify this precedent setting proposal.

The adventure theme park proposal does not satisfy the objects and management principles of the NPW Act as it blights a prime scenic attraction, that is also an excellent example of internationally significant geodiversity. If a coal mine were to propose a vent shaft at the base of Lost City it would not gain approval and nor should a commercial adventure tourism proposal.

There is no need for this government-subsidised, a private commercial proposal to exploit and ruin the most scenic attraction near Lithgow, and no site selection process has been carried out to prove this site is preferred.

**Key considerations: dot point three:** Only an architect designed lookout and associated visitor facilities should be placed at Lost City South. Distracting infrastructure and buildings for commercial adventure tourism in the centre of this viewshed as proposed shall ruin this outstanding view.

**Adventure Tourism, Key considerations: dot point four:** The proposed activities will not benefit Lithgow as visitors are most likely to enter and leave the reserve by Old Bells Line of Road and not visit Lithgow. Using this road will destroy the perception of Gardens of Stone as a natural wonderland, as this large, ugly quarry pit will be a lasting memory of the visit. If these facilities are located in State Mine Gully, visitors will visit Lithgow.

**Adventure Tourism, Strategies, all points:**

Comment: It is very unlikely that cultural, environmental, and visual impacts are minimised through commercial-in-confidence NPWS adventure tourism lease processes for ziplines, via ferrata and canyon adventures at Lost City.

Neither the NPWS or commercial interests seem willing to apply the objects of the NPW Act to its proposals. Application of the NPW Act would require location of facilities through a rigorous site selection process to ensure a site meets the objects of the Act. At nearby State Mine Gully these so-called signature attractions will meet the Act's adaptive reuse test by reusing Dobbs Drift, and benefit Lithgow more through proximity to the State Mine Museum and the town centre.

**Page 51, Events and "organised activation"**

**Key considerations, dot point 2:** The families who will use the Gardens of Stone SCA require the application of lower visitor limits for events than those proposed. Loud 'music festivals' and other loud 'cultural festivals' are inappropriate to the management purposes of a state conservation area. These licenced activities would harm the quiet enjoyment of nature (and the happiness) of other visitors, for example families staying at nearby Forest Camp.

**Key considerations, dot point 4:** Fixed infrastructure for events must not include a waste dump in the reserve. The reserve has enough infrastructure degrading the landscape without a waste heap.

**Strategies, dot point 1:** Reduce maximum visitor numbers for events to 500. The resources and infrastructures required for 5000 persons is out of context with this remote state conservation area setting. Supporting 5000 visitors would create enormous operational problems for reserve managers, for example, the maintenance of dirt roads.

**Strategies, additional dot point:** Limit the number of events to no more than four per year, otherwise the reserve will lose its nature-focused character and instead become an events destination.

## **Page 52: Camping and on-park accommodation**

**Objectives, dot point two:** Comment: Large events should not be located near Forest Camp. Users of the reserve camping facilities are likely to be families and older couples. Many of these visitors will not like to be located near noisy events or suffer revellers returning to camp late at night.

The visitor groups who will not like events include school and educational groups, visitors on a longer tour adding Lithgow to an itinerary, tour companies, visitors wanting comfort, grey nomads and most adventure tourists and special interest groups.

**Objectives, dot points three and four:** The Expression of Interest has an illustration that indicates commercial camping facilities could be prominently located in the viewshed of a scenic pagoda landscape, ruining these views for everyone else. It is duplicitous, cynical and hypocritical to euphemistically describe proposed commercial facilities as an 'innovative camping option', with 'low-impact accommodation' while indicating to the tourism industry that high visual impact accommodation development could be appropriate. Such behaviour is likely to produce poor visitor management outcomes and blighted landscapes.

**Objectives, dot point four:** Consideration of the Wollemi Great Walk must be limited to facilities in the Gardens of Stone State Conservation Area.

**Objectives, new dot point:** To ensure NSW protected areas remain publicly owned and to encourage inexperienced walkers, the Wollemi Great Walk should provide free camping.

Comment: Fees discourage the young and financially disadvantaged from undertaking multi-day walks. Excessive fees for camping sites in the Grampians National Park, Victoria have discouraged some park visitors and generated push back from walkers.

**Key considerations, Dot point 3: NSW environment groups oppose exclusive private camping facilities in national parks and state conservation areas. These facilities displace other users and can 'pick the eyes out' of the reserve for those who can pay** (see also comments on Figure 11).

**Key considerations, Dot point five:** Caravans and large camper trailers should be restricted to one location because these units require extra space and are awkward to manoeuvre. They tend to dominate camping facilities and require more management resources.

### **Figure 11 camping accommodation strategies:**

Comments: Proposed camping options for supported accommodation are viewed with alarm. The proposed sites take camp sites that should be made available to inexperienced free walkers.

The camp sites proposed on Carne Creek should be for inexperienced free walkers. The sites proposed on the Wolgan River are near important Aboriginal art sites and are inappropriately located.

The supported accommodation options are to be vehicle accessible sites, yet several of these proposed camping sites do not have vehicle access, such as those on Carne Creek and Wolgan River. These sites should be removed from Figure 11.

**Page 53 Camping, Strategies, dot point 3:** Comment: Regarding the proposed use of decks or pontoons on dams beside Forest Camp. These dams contain dangerous dumped rubbish and broken bottles from decades of misuse. These hazardous wastes require removal before these dams are safe for swimming.

**Strategies, dot point 4:** Why should 4WD vehicle camping have 'elevated camping decks' when 2WD vehicle camping does not? Either make these decks universal to all vehicle camping sites or omit these decks.

**Strategies, dot point 6:** Environment groups oppose exclusive private leases for accommodation associated with Wollemi Great Walk. Environment groups oppose built accommodation in NPWS parks and reserves, especially those in remote locations. Built accommodation should be located on adjoining private land in the Wolgan and Capertee valleys.

**Strategies, dot point 6:** Wollemi Great Walk is poorly defined by the draft Master Plan process and key aspects of it will be determined by tourism industry and imposed on the public's reserves. This creates unacceptable public engagement issues if leases and contracts are negotiated in secret for this Walk before amendments to draft plans of management are considered through public consultation processes.

**Strategies, dot point 7:** elevated campsites are not needed in the Blue Mountains unless a camping ground is heavily used and there are a limited number of camping sites available.

**Strategies, omit dot point 9:** Covered by dot point 4 and overkill to have two separate strategies for 4WD camping as it results in expectations for many small, remote 4WD campgrounds scattered through the reserve. Dot point 9 replicates the current management problems with 4WD vehicle camping. The suggestion that 4WD vehicle users will become good campers after decades of misusing this area is unlikely. To aid effective management, all vehicle-based camping should be at Forest Camp.

**Strategies, omit dot point 10:** Overkill unless the draft Master Plan is suggesting camping options for people with mobility issues, in which case this point should be made clear.

**Page 54 Services and Facilities:** This section appears to repeat the objective, key considerations and strategies of the previous Adventure Tourism and Camping sections.

**Figure 12 Visitor Facilities and services:** Figure 12 needs to be amended to be consistent with the campgrounds shown on figure 11. The Figure needs to be checked for other inconsistencies, for example lookouts and viewpoints.

**Page 55 Services and Facilities, Strategies, 1 Lost City Precinct:** Inappropriate to place adventures in the middle of the view from the major lookout as proposed. Relocate adventures to Dobbs Drift and State Mine Gully.

**Strategies, 1 Lost City Precinct:** It is misleading not to specify the required utilities and services for a for this major site; including roads, power, water, sewerage and waste. The draft Master Plan is the only opportunity for public comment on what will be proposed at Lost City and it is disingenuous to omit facilities based on some broad assumptions of daily use. It must be assumed that the proposed facilities will further blight this iconic pagoda landscape. Further, the facilities on page 56 may be overlooked by readers, creating a false impression of what is proposed, e.g. the facilities for a 'pop-up' café can mean a parking space or expensive water and power services.

**Strategies, 1 Lost City Precinct:** The iconic lookout at Lost City will be ruined by the buildings proposed for the adventure tourism (as shown in the Expression of Interest). An adventure tourism theme park and an iconic lookout at Lost City are incompatible uses. The State Mine Heritage Museum and Park would benefit from relocating adventure tourism to Dobbs Drift and State Mine

Gully. Visitors would be unlikely use the Old Bells Line of Road if the adventure hub were located at State Mine Gully and would instead always pass through Lithgow.

**Strategies, 4 Long Swamp Precinct:** Access for school groups will only be possible if 2WD vehicle access is established on Long Swamp Road to its junction with the Gardiners Gap Road.

**Page 56, Services and Facilities (cont.), Strategies [numbering repeated] [Lost City precinct continued/repeated] point 3.1:** Suitable location for outdoor seating iconic lookout [shown in Master Plan at figures 16 and 17, and point 7] is at odds with the suitable location for the iconic adventure tourism facilities [as shown in the Expression of Interest and the above figures]. Solution is to relocate iconic adventure tourism facilities to State Mine Heritage Park at nearby Dobbs Drift and State Mine Gully.

**Strategies point 3.2:** Suggesting a 'pop-up' coffee shop does not explain the road, power, waste, water and sewage requirements for visitor use at this iconic lookout/amusement theme park site. Providing these facilities will be a multi-million subsidy by NSW Government for a 'pop-up' café and amusement theme park that ruins this scenic site. These infrastructure provision costs will be much lower at State Mine Gully and the savings can be used to acquire the property from the museum.

**Strategies point 9:** Camping should be on page 53, section 3.2.12, that deals with camping.

#### **Page 58, Collaborative opportunities**

**Key Considerations, dot point 8:** There is no need to replicate the Hassans Walls downhill MTB network as proposed with downhill trails at State Mine Gully. This would be inefficient. It appears that the reason why there are additional single track trails being proposed is due to the consultant who proposes these facilities also builds these tracks and has access to the government. The NSW Government has made a public announcement and so millions of dollars will be spent. These proposals in a public reserve should be made available for public comment and review in a well-argued report that considers existing facilities and cycling requirements.

**Key Considerations, dot point 9:** The Zig-Zag railway is another potential venue for an adventure activity hub and zipline. Collaboration on a public site selection process for the adventure infrastructure would have permitted consideration of a Zig-Zag option and determined whether the necessary partnerships for this use could be established to complement visitor use to this historic attraction.

**Key Considerations, additional dot point:** Increased visitor use and improved tourism outcomes are best achieved by working with Lithgow Council to tie Lithgow's traditions and mining heritage in with reserve visitor use through close association of adventure and bicycle facilities on State Mine Museum land.

**Page 59, Strategies, point 2:** Collaborative processes for Lost City do not work well with secret contract and lease negotiations. To avoid the clash between visitors enjoying lookout views and consumers at the Adventure amusement park there needs to be a public process of site selection, review involving stakeholders to resolve conflicts at Lost City. The obvious solution would be the collaborate with Lithgow Council and relocate adventure tourism to Dobbs Drift Gully on State Mine Museum land.

**Dot point 7:** A bicycle Rail Trail from Newnes Junction to the former pine forest would require excessive investment due to the need for bridge construction and substantial native tree clearing required along heavily forested embankments and cuttings.

**Page 62, State Mine Gully and Lost City, introduction panel, additional dot point:**

‘Due to degree of proposed adventure facility development, it is necessary to separate sight seeing at Lost City from Adventure Tourism at Dobbs Drift in the State Mine Gully.’

**Introduction panel, comment:** Conducting an expression of interest process for commercial partners for adventure recreation at Lost City in parallel with public exhibition of management processes will fail to protect the public interest in heritage protection that is required by the NPW Act.

**Introduction panel, comment:** Bungleboori South, Bald Trig and Farmers Creek Lookouts should be removed from the precinct strategies as these attractions encourage visitors to use the Old Bells Line of Road.

**Precinct Strategic Plan, dot point 4:** Convert Old Bell Line of Road to a virtual dedicated truck haul road with prominent warning signage featuring an image of a 5-axle truck with dog trailer bearing down on a car. This will save the lives of several tourists inexperienced in driving with trucks on dirt roads, and direct Gardens of Stone tourists into Lithgow ... - see also the above comment.

**Precinct Strategic Plan, dot points 4, 6 and 11:** Discourage visitor arrival by Old Bells Line of Road is contradicted by dot points 6 and 11. It is also contradicted by Figure 7, page 42 showing Clarence as a Main Park Entry. To discourage use of this road for reserve access, remove all proposed visitor facilities that are accessed from the Old Bells Line of Road.

**Page 63, Figure 15, State Mine Gully and Lost City Precinct Strategic Plan,** Lookout location is different to the location in Figure 16 and 17. Relocate lookout icon on Figure 15 to correspond with locations indicated on the node and area plans, which correctly locate the lookout.

**Page 64, Figure 16, Lost City and Marangaroo Swamp Area Plan:** Plan is unworkable because it places adventure facilities in the middle of view from the lookout, ruining Lithgow’s best natural asset. Eol indicates a building that supports facilities described in dot points 7, 8 and 9 at the base of Lost City is visually prominent and draws the eye to these facilities. These proposals are contrary to the management principles and objects in the NPW Act as they are clearly incompatible with protection of important scenic amenity and geodiversity values.

Section 4.1.1 **Lost City and Marangaroo Swamp Area Plan** is misleading as it does not outline the extent of access, infrastructure and facilities required for an adventure hub and lookout as described in the Services and Facilities section of the draft Master Plan. The adventure activities need to be placed in State Mine Gully to separate these activities from the iconic Lost City view.

**Area Plan proposals Figure 16:** The proposed lookout at Marangaroo Creek East will be visually intrusive as it will be seen from main Lost City lookout. Lookout must have a low in profile and not be constructed of stainless steel to avoid glint. Ditto Marangaroo Lookouts south and north.

**Area Plan proposals Figure 16:** Proposed multi-day walk option should not be located on fragile exposed montane heath with shallow soil. Relocate the multi-day walking track into the adjoining woodland.

Page 65, **Lost City Visitor Node Plan, Figure 17:** This proposed design is unworkable because it places adventure facilities (take-off and landing decks – dot point 10) and a bottom lookout (dot point 8) in the middle of view from the top lookout (dot point 7), ruining Lithgow’s best natural asset. Further, Eol indicates a building to support visitor facilities at dot points 8 and 10 at the base of Lost City causing further blight.

The Adventure Tourism operator will want an efficient road connection between the facilities at dot points 8 and 10, but the Lost City arrangement is by a long, circuitous route. Most riders will be unwilling to walk up the hill to point 1, and vehicle support requires a road extension to point 8. These adventure activities are better placed in Dobbs Drift/State Mine Gully where there is efficient road access, and to separate adventure activities from enjoyment of views from the Lost City lookout.

**Area Plan, Figure 17, dot point 11:** The Via Ferrata is a poorly located in the right in view from the proposed main lookout, relocate to a less prominent area, such as State Mine Gully. Climbers were banned from the Three Sisters and Mt Banks decades ago due to damage to scenic amenity and culture values, but at the Lost City, the NPWS is advancing reserve development that would cause greater environmental abuse.

**Page 68, Dobbs Drift Visitor Node plan:**

Relocate Zipline and Via Ferrata to State Mine Creek gully. Services can utilise State Mine Gully Road and connecting sealed road to the turnoff to Lost City lookout. Providing utilities on-site for adventure tourism will be cheaper than at the Lost City location. Mountain Bike, a Café and Adventure Tourism activities on Lithgow State Mine Heritage Museum land would help to make the Museum a viable year-round tourist attraction.

Page 69, **Bungleboori Lookouts etc. Visitor Area, Figure 19:** Omit dot points 1, 2, 3 and 6, Bungleboori South Lookout and Bald Trig Lookout because visitors are to be discouraged from using Old Bells Line of Road, which is dangerous due to being a truck haul road. The impact of the large quarry on visitors creates the wrong sense of expectation (e.g. "I thought was I taking my family to a scenic wonderland, not a quarry?").

Page 70, **Carne Creek and Former Plantation Precinct, Strategic Plan, dot point 3:** Rebuild Maiyingy Marragy Trail as a road suitable for 2WD vehicles to create a tourism loop road that all vehicles can use.

Page 71, **Carne Creek and Former Plantation Precinct Strategic Plan Figure 20:** Walking track and Mountain Bike track networks must not traverse long lengths of nationally endangered swamp as proposed at Bungleboori and Dingo Creek. The ecotone between swamp and forest needs to be protected for wildlife to move freely in the ecotone between the swamps and woodland environments. For a small mammal, a spiny freshwater lobster or a skink, a mountain bike trail is as inaccessible as a highway and opens swamp habitat to increased feral animal predation.

**Page 72, Figure 21, Former Plantation Visitor Area Plan:** Being the proponent and construction company for the proposed mountain bike track network at Forest Camp, these proposals need to be independently reviewed and reduced. The NPWS must limit the extent of bicycle facilities to what is sustainable in the long term. The proposed networks of walking tracks and mountain bike tracks are overkill and will decline due to lack of maintenance. There is no reason why the mountain riders can't use the former pine forest road network. Many of the forest roads are suitable for bike riding.

Further, how is the NPWS going to prevent motorised trail bikes from ruining these bike trails?

Walkers do not like multi-use trails because walkers do not like repeatedly getting out of the way for mountain bikers riders or walking on rolling and looping bike tracks that seem illogical to them. There is potential for accidents between these users. Walkers have largely been displaced from the Thredbo River in Kosciuszko National Park indicating that dual use tracks are not suitable for walkers.

**Page 73, dot point 2 and Figure 22, Forest Camp Visitor Node:** Note previous remarks on the impracticability of Rail Trail south from Pine Forest to Newnes Junction, near Clarence, due to high capital cost of reconstruction.

**Pages 76 and 77, Birds Rock Precinct**

Sunnyside Ridge and Birds Rock roads should be suitable for 2WD vehicles to the lookout carpark to permit all reserve visitors to enjoy this extensive view.

**Pages 76 and 77, Birds Rock Precinct, Figure 25, dot point 3:** Shorten the side road to the lookout to avoid ascent to Birds Rock and relocate the proposed carpark to the forest edge. The shortened access road saves funds that can then be expended on upgrading Sunnyside Ridge Road. Birds Rock was a former Flora Reserve and this proposed future management by the NPWS should respect its nature reserve equivalent status by keeping visitor facilities to a minimum. Having vehicles grinding up to and past the lookout point to the currently proposed carpark distracts from enjoying the wonder of such an expansive view (see also further comments on pg 78, fig 26 below).

**Birds Rock Precinct, dot point 6:** A half-day walking loop around the former Birds Rock Flora Reserve can be achieved by using an existing former 4WD track down the east-west trending spur located just to south of Birds Rock. The former 4WD track connects with the proposed multi-day track to provide the walking loop. Only interpretive signage indicating the location of this walking route is required to establish the walking route.

**Birds Rock Precinct, Figure 25, dot point 6:** A second half-day walking loop track from Bird Road exists to the west to the Wolgan River and Wolgan Falls that also links with the proposed multi-day walk. Only a short connecting track is required to connect Birds Rock with the multi-day walking route and Wolgan Falls, otherwise use Fire Road No. 5. In the later situation, only interpretive signage indicating the location of this walking route is required to establish the walking route.

**Page 78, Birds Rock Lookout Visitor Node, Figure 26:** Curtail vehicle access 400 metres before lookout rock and install the proposed carpark and visitor facilities at the forest edge. A walking track from the south to lookout would only be 400 metres long with a 20 metre climb, not much further than from the currently proposed carpark and only 10 metres higher. A short loop walk from the lookout can then be established with the return being on the existing road.

**Page 80, Long Swamp Precinct:** If school students are proposed to use the Long Swamp precinct, then Long Swamp Road access should be to a 2WD vehicle standard to its junction with Gardiners Gap road.

**Long Swamp Precinct, dot point 1:** Reserve entry signage should be installed with the agreement of the Mangan Wiradjuri Traditional Owners on the Wolgan Road turnoff. The addition of Maiyngu Marragu Aboriginal Place to the SCA would enable better integration of cultural heritage and management.

**Long Swamp Precinct, dot point 3:** Vehicle access should be 2WD to Birds Rock lookout turnoff and then 4WD standard to Sahara Point.

**Pages 80 and 81: Long Swamp Precinct Strategic Plan dot point 5 and Figure 28:** Maiyngu Marragu Road should be of a 2WD vehicle standard to enable all visitors who drive vehicles to access the spectacular sights of the Temple of Doom, Wolgan Gorge and Wolgan Falls that branch off this road.

**Long Swamp Precinct, Dot Point 12 and Figure 28:** Support proposed carpark being located to the west of Lost City.

**Pages 81, Long Swamp Precinct Strategic Plan, Figure 28:** Viewing Wolgan Gap from this location is dangerous due to vehicle interactions. There is nowhere to park at Wolgan Gap and so this viewpoint should not be promoted.

**Long Swamp Precinct, Figure 28:** Wolgan Gorge Lookout requires the agreement of the Mingan Traditional Owners and preferably with the addition of Maiyingu Marragu Aboriginal Place into the SCA.

**Page 82, Long Swamp Precinct and Visitor Area Plan, Figure 29:** Agree with dot point 2 if precinct is to be used by school students, see also comments for Figure 28.

**Page 83, Wolgan Falls Node Plan, Dot Points 1 and 2, Figure 30:**

Comment: Visitor management proposals for this waterfall are a poor solution. Close Number 5 Fire Road to permit use by walkers to falls lookout. Vehicle use of Number 5 Fire Road clashes with visitors going to this major attraction.

The Wolgan River vehicle crossing, road alignment along the riverbank and up the 'Spanish Steps' have all been badly degraded and abused by 4WD vehicle use. This use should be curtailed and the road rehabilitated. It is naïve to assume future 4WD users will be "responsible" now that the area is reserved. "Responsible use" would mean use as before, displacing the many who would come enjoy the views of Wolgan Falls. Allowing environmental abuse to appease 4WD users is bad reserve management policy as it endorses the continued environmental indifference, noise and aggression of high-performance 4WD vehicles.

**Wolgan Falls Node, Dot Point 3, Figure 30:** Relocate visitor parking for Wolgan Falls to the junction of Number 5 Fire Road and Maiyingu Marragu Road. Fire Trail No 5 is too steep to be suitable for 2WD vehicles use.

**Wolgan Falls Node, Dot Point 4, Figure 30:** Use Fire Trail No 5 as a walking track and close to 4WD vehicle use (see remarks above for reasons).

**Wolgan Falls Node, Dot Point 6, Figure 30:** Do not provide access to top of Wolgan Falls, as there is no way to make this location safe for visitors. Allow use of waterfall by canyoneers, but monitor access tracks for damage.

**Wolgan Falls Node, Dot Point 7, Figure 30:** Agree with rehabilitation but investment will be wasted if continued 4WD vehicle use is permitted. Use will be by high performance 4WD vehicles that will degrade the restored road. The previous rapid degradation of Baal Bone Gap Road and Moffitts Road by high performance 4WD vehicles illustrate the likely outcome of continued vehicle use of a rehabilitated Fire Road No 5.

**Page 85, Baal Bone Gap Node Plan, Dot Point 1 and Figure 32:** No vehicle access is currently possible due to extensive damage to Baal Bone Road at the 'Big Dipper' pass to east of Gap and associated quagmire below it. Another large quagmire to the west on Moffitt Road was also caused by high performance 4WD vehicles.

These roads have been repaired on several occasions, and subsequently abused. Costly reinstatement of these roads to a sustainable condition will be wasted unless these roads are closed during wet weather.

Retain existing locked gate at road located near dot point 5 on figure 32.

**Consider negotiating 2WD vehicle access to Baal Bone Gap from west through former mining area.**

**Baal Bone Gap Node, Figure 32, Dot Point 7:** Camping ground, dot point 7, has been damaged by 4WD vehicles require vehicle barriers to prevent further damage.

**Page 87, Criteria for Setting Priorities:** These priorities are a good starting point.

Resolution of user conflicts must be addressed by additional priority setting criteria.

Criteria must consider budget implications and select those visitor activities based on least environmental impact/greatest advantage in environmental restoration, as well as most visitor benefit, and community benefits for Lithgow.

Tourism growth will be greater if reserve management priorities consider budget, environmental restoration, separation of users groups and environmental protection, than if development is placed in the reserve without regard for these factors, such as at Lost City.

# Appendix B

## Comments on the multi-day walking route options

### Route B1/ Possible multi-day walking route extension from Ben Bullen to Long Swamp/Coxs River headwaters

Notes from walking inspections on January 7, 11 and 17, 2022:

#### Summary

A walking route either on Moffits Road or a new track parallel to it is a preferred route option. This route is more scenic than the examined alternative option to the south on rolling but swampy terrain in Gardens of Stone National Park and State Conservation Area.

Moffits Road has extensive tree-filtered views of the Capertee Valley to the north and provides views of pagoda spurs in all directions. Moffitts Road passes the Moffitts Pagodas, where side walking track could be established to this dramatic viewpoint. Of the walking route options continuing south from Baal Bone Gap, the Bicentennial National Trail is the more scenic route option of the two examined, with views of the Wolgan Valley, but this option has vehicle traffic, especially on weekends.

Before reaching the head of the Coxs River and Long Swamp, an interesting walking route diverts off the BNT southwards along the Great Dividing Range to Gardiners Gap and then descends to the Coxs River and Long Swamp.

Market objective – To provide a multi-day walking track for inexperienced walkers, that will be superior to the Six Foot Track from Katoomba to Jenolan Caves.

Attractions – existing Moffitts and BNT roads have a large variation of views of cliffs, pagodas and other geodiversity, as well as fields of wildflowers in spring. Dramatic side trip to Moffitts Rocks is possible.

Access for management – good

Separation of users – the proposed route option follows and crosses roads at a number of points, creating opportunities for half day walks. Options to use the BNT.

Cost/maintenance – determined by decision on whether to upgrade of vehicle access by Moffitts Road. The low cost option is to create 2WD vehicle access via former Baal Bone mine.

**If Moffitts Road were made a walking route, vehicle access to Baal Bone Gap would need to be improved by opening the 2WD suitable, well drained and graveled road that passes through Baal Bone mine. This would create a Moffitts walking track and improved vehicle access to the Gap at a low cost.**

#### Detail

The walking route from Ben Bullen village was examined located near the southern boundary of Gardens of Stone National Park and State Conservation Area. Where this southern route approaches near private land, the bushland has been intensely burned causing tree death. Bands of thick acacia

and native holly have developed where tree overstorey has been killed. Between low ridges on this route option lie areas of swampy land.

The traverse below pagoda studded sandstone escarpments beside Baal Bone Creek is on sloping land for 500 metres that is partly infested with blackberries. This route option must negotiate the state conservation area boundary beside fenced private land owned by the Baal Bone Mine. Past this constriction, the road to Baal Bone Gap from Baal Bone Mine is followed. This road is a scenic, flat walk with views of pagodas. This graveled road is in good condition as it lies between two locked gates.

A viable alternative walking route is located south of the Baal Bone Gap and uses a gently undulating former mine maintenance road through a low valley thick of acacia and eucalypts. It offers no camping opportunities or water. Longwall mining drained the stream that once flowed there. The 2019-20 fire accelerated mine-induced ecosystem change from grassy dells to a dense acacia thicket.

**The preferred walking route follows the Great Dividing Range to Gardiners Gap presents excellent views of multiple pagoda fields.** No dangerous longwall mining cracks wider than 15cm were encountered on the many mining-fractured pagodas of this spectacular area. Walking further south beside Long Swamp offers delightful views of this endangered ecological community and a new bridge offers an easy crossing at the Coxs River. A walking route should cross a side creek draining Gardiners Gap at a point about 300 metres above this creek's junction with the Coxs River.

The Bicentennial National Trail from the Moffitts Road to Wolgan Road is an alternative walking option, although used by 4WD vehicles, especially on weekends. Taking the BNT route option offers views of the Wolgan Valley but misses out of delightful pagodas around Gardiners Gap and excellent walking beside Long Swamp.

#### **Notes on Ben management issues:**

##### Access

Vehicle access to Baal Bone Gap, as with roads associated with Wolgan Falls, Birds Rock and Lost City, is now limited to modified 4WD vehicles due to severe road degradation by 4WD vehicles.

Moffitts Road is impassible to 4WD vehicles at Jews Creek, due to a large quagmire. It is no longer suitable as a Cat 1 fire road beyond the swamp, without significant road works. The steep uphill pass on the Bicentennial National Trail from Baal Bone Gap south to the Great Dividing Range is also impassible to 4WD vehicles in several places. These roads were rebuilt after the 2019-2020 fire for fire management purposes and have been ruined since then by 4WD vehicle misuse. Modified 4WD vehicles attempting to use these roads in wet weather have rendered them unusable since repairs done in early 2021. At a minimum, the roads need to be gated before Jews Creek and at the top of the BNT pass to protect these roads during wet weather.

If public vehicle access is negotiated through the former Baal Bone Mine, then the open land beside the graveled 2WD road to the Gap will be at risk of unregulated camping in the State Conservation Area which would need to be addressed, possibly by fencing. This vehicle access option may be preferred to the alternative of expensive upgrades for Moffitts Road and the Baal Bone Gap Road as both these roads are in an unusable state.

The worst option is where the roads to Baal Bone Gap and any associated facilities become continually degraded by on-going misuse.

### Pest species

Following the 2019-20 fire, blackberry infestations have established a foothold along the southern margins of national park and the state conservation area. Blackberries were encountered along the southern route walked in small but frequent patches from Hutchinson Road to Baal Bone Gap. Blackberry infestations occur in larger concentrations along Long Swamp, an EEC. These Coxs River infestations have good vehicle access and so control will be less difficult.

Signs of minor pig damage in swampy area south of Moffit Trail adjoining private land, DP755759, Lot 24.

### Rubbish

100m along Hutchinson Road from Castlereagh Highway a lounge suit and other assorted domestic rubbish has been dumped on left of road at the entry to old open cut mine.

A burnt out Subaru sits at the top of the (Big Dipper) pass to the east above Baal Bone Gap.

Keith Muir  
19 January 2022

## **Route B2/ Possible loop walking route option from Lithgow**

Notes from walking inspections January 24, 25 and 26, 2022

### **Summary**

A route for a Lithgow walking track loop helps to link the 'pagoda brand' of the Gardens of Stone to Lithgow, strengthening road loop concept.

Due to unavoidable intersection with roads, a Newnes Plateau loop walk will also create several half day walks, enabling this walking track to provide for several sections of the tourism market (e.g. comfort walkers, grey nomads, and special interest groups). The walk must carefully located when crossing streams and to avoid Aboriginal sites so that inexperienced walkers do not cause impacts through camp site proliferation. The loop walk will need to avoid most of the montane heathland areas found around the pagoda spurs. Walkers will be tempted to wander over these open areas and cause impacts to fragile vegetation that hold skeletal soils in place. Walking on platey pagodas also needs to be avoided through careful route selection.

Kangaroo Creek valley is a standout, intact scenic environment and great care must be taken when considering its use. The Angus Place mine sits in front of Kangaroo Creek valley and vehicle access for management purposes requires negotiation with Centennial Coal.

The 2019/20 back burns of Newnes Plateau have caused extensive tree death in Marangaroo and Sawyers Swamp Creek catchments and around the parts of Becroft Trail. Dense regrowth occurs in most of these areas and will take a decade to recover its former natural beauty. Elsewhere forest canopy trees are recovering well, and some areas are already a delight to walk through as before. Unlike the Ben Bullen area, Newnes Plateau and its valleys to the west are mostly weed free.

## Discussion of issues

### Walker entry points

Farmers Creek is a surprising, pretty entrance to GoSSCA along a historic 4WD road, with beautiful sandstone flagging of its creek crossings. The road offers promising views of pagodas and there is a walking route option from there to Marrangaroo Creek catchment by way of an intact EEC valley swamp.

Another entry option is beside State Mine Gully Road, and up a gully at Dobbs Drift to the Marrangaroo Creek catchment. This too is an interesting and novel entrance to the reserve as it passes cultural heritage, quaint cottages and a well-watered, lush valley.

### Issues arising from route walked

The perception of Newnes Plateau as a doughnut, where off road vehicle users and coal mining dominate its centre, while walkers use the perimeter is only partly correct.

Adventurous motorised trail bike riders have damaged several rugged areas on the Plateau's perimeter. These riders have caused great damage to scenic areas and taken great risks when using powerful bikes to negotiate steep, extended climbs that are difficult to walk up (e.g. tributaries of Carne Creek). NPWS public liability responsibilities can not allow such dangerous riding to continue.

Noise pollution is a significant visitor management issue, not only emitted from 2-stroke trail bikes and some 4WD vehicles, but also Springvale mine's noisy air vent in the Marrangaroo catchment that can be heard six kilometres away. The vent noise makes it unpleasant to camp anywhere in a wide radius of it, but this noise issue can and should be fixed by the EPA.

In eastern part of Marrangaroo Creek catchment upstream of Lost City, Centennial Coal contractors have in the last two years caused damage to montane heath by driving to a survey point, instead of walking a short distance. This damage demonstrates the fragility of these low heathlands. The nearby the former Snow Gum Flora Reserve is best avoided by the walking route as it is damaged by 4WD vehicles and the 2019/20 back burn. Apart from environmental restoration, the former Snow Gum Flora Reserve should be kept closed to visitors to allow it to recover.

A route option across the Marrangaroo Creek catchment that traverses montane heathland should be avoided due to the tendency of walkers to wander off track and damage the low heath vegetation. A more appropriate walking route option is the 4WD roads that skirt this catchment to the north and that eventually cross the Lost City access road and descend into the catchment of the second arm of Marrangaroo Creek.

It may be possible to negotiate a route within the second arm of Marangaroo Creek below dramatic pagodas, but Marangaroo Creek's third arm is rugged and should be avoided. From the second arm of Marangaroo Creek the route traverses more intact forests below the Springvale ventilation shaft and then west to the Beecroft Road by a route in the catchment of third arm of Marangaroo Creek.

A forest route from Beecroft Road trending north-west to Kangaroo Creek valley is straight forward. Final route selection should be made with a view to the future, not solely on current condition of the regenerating forest. For example, an option that offers a view of the very dramatic pagoda spurs above Sawyers Swamp Creek could be considered.

The thick eucalypt regrowth below and to the west of the heavily cleared powerline easement that runs beside Beecroft Road makes walking difficult. A walking route below the powerline *might* be a

better route once *if* fire management for this fire-sensitive forest allows recovery. It is evident that the very wide powerline easement is used as a fire control line, rather unfortunately for the landscape. If this easement is a permanent fire control line, then it route selection would be to the east in the Kangaroo Creek catchment.

The best passes into Kangaroo and Lambs creeks have motorised trail bike tracks through them. The trail bike track from Kangaroo Creek into Lambs Creek was by a gully that is now inaccessible to trail bikes and this may have saved these valleys from further trail bike damage. The upper parts of both Kangaroo and Lambs creek valleys are swampy, and both trail bike track exits are probably the best route options.

About 500 metres down the Wolgan River Road (i.e. FT no5) from “Blackfellows Hand” Road junction, the walking route takes an eroded trail bike track to the east. An indistinct trail bike track then leads off this track leads to the Wolgan River. The Wolgan River valley is currently swampy but in dry weather will invite unregulated camping. The entry and exit points from the river valley need to be well chosen to avoid inappropriate camping on river flats near Aboriginal sites. The ridge route option from the river goes directly to Birds Rock and its last two kilometres traverses a hardly used 4WD road through a pretty and grassy forested landscape. Alternatives are a route upstream along the Wolgan River or a route option that follows an existing trail bike track to emerge above the “Spanish Steps” on Fire Trail No. 5. This later route option requires a long road walk to Birds Rock.

In the last two years, trail bike use has caused much damage of the track that crosses an unnamed creek at the bottom of the former Birds Rock Flora Reserve. The walking route from the former Flora Reserve heading east was another trail bike track that uses the first negotiable route to across the west branch of Carne Creek to reach North Ridge Road. The trail bike damage in this area should be to be examined, as the gullies of a beautiful pagoda and canyon network has been badly eroded by this activity.

Several possible routes can be considered between Wolgan River and Carne Creek catchments to return to Lithgow.

By an iterative process a route can be selected that avoids most of the 4WD roads, and samples intact upland swamps and beautiful forests to return to the point of commencement.

Keith Muir, 31 January 2022