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Draft Plan of Management – Gardens of Stone (STAGE 2)

Introduction

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from 70 bushwalking clubs throughout NSW and the ACT, and provides a united voice to local, state and federal government agencies and other bodies on issues affecting bushwalkers.

The Gardens of Stone has been a premier bushwalking destination for many years and individual bushwalkers have been instrumental in raising awareness of the importance of the Gardens of Stone as an important conservation precinct and in lobbying government for its protection.

Relationship of Draft Plan of Management to Draft Master Plan

The draft Plan of Management should be the primary statutory document for managing the Stage 2 area in accordance with the requirements of the National Parks and Wildlife Act. It should give direction to the draft Master Plan. It is noted that the draft Plan of Management states that:

"the specific type and 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 and in consultation with Wiradiuri representatives and relevant recreational user groups." (See page 5 of draft Plan of Management).

It is therefore puzzling that the draft Master Plan has already been developed and is presented alongside the draft Plan of Management as part of the public exhibition process. Bushwalking NSW considers that the draft Plan of Management should have been exhibited first and the Master Plan prepared following formal adoption of the Plan of Management.

We have also provided comments on the draft Master Plan in any case but consider the dual public exhibition process to be rather a clumsy way of consulting with the community.

Establishing a major new visitor destination in the Blue **Mountains**

Most of our comments in relation to this proposal have been reserved for the draft Master Plan as the bulk of detail sits within that document.

However, we note that in proposing Stage 2 for a new visitor destination there appears to have been no assessment of whether other sites in the Lithgow area were considered as part of a broader planning process for a visitor destination. It raises the question of whether the declaration of Stage 2 Gardens of Stone was made to facilitate the establishment of a new visitor destination and that the revenue from the visitor destination will be the primary source of funding to drive the rehabilitation and conservation works identified in this draft and in the draft Master Plan.

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The question that has yet to be answered is whether Stage 2 is the best location for a visitor destination. The rehabilitation of degraded areas in Stage 2 will take years if not decades. Should the NSW Government be considering a more low-key implementation of recreation facilities with a gradual and staged implementation of more 'intensive' facilities proceeding on the basis of completion of rehabilitation works? This is a question that should be addressed in the planning process.

Development of a Multi-Day Walk

This is proposed for Stage 2 though the draft Master Plan also suggests that this will be extended into Wollemi National Park, part of the Greater Blue Mountains World Heritage Area.

The draft Plan of Management (and the accompanying draft Master Plan) indicate that the walk will be serviced by low-impact accommodation which could be operated by and leased to a private sector partner. It is noted that seven locations for "accommodation nodes" are identified and it is assumed that this would be built accommodation of some kind.

Bushwalking NSW would be extremely concerned with the leasing of this accommodation on national park estate to a private partner. If this accommodation is to proceed then it should be operated by NPWS.

The draft Master Plan suggests that the proposed multi-day walk will extend beyond Stage 2 and into Wollemi National Park as a combined walking and mountain biking route. Again, there is a suggestion of "guided walker accommodation". No further information is provided on this.

Bushwalking NSW would be opposed to new accommodation buildings being constructed within a World Heritage Area. While we consider that a multi-day walking route within Wollemi National Park has, in principle, some merit and should be investigated further, we consider that the proposed route should make use of existing trails or walking tracks as much as possible. The need to construct new tracks or trails should therefore be kept to a minimum.

Authorised Activities

The draft Plan of Management lists the activities authorised for Stage 2 Gardens of Stone. It is puzzling that bushwalking or hiking are omitted from the listed visitor activities. It can only be assumed that this is a drafting error and is not intentional!

Submission - Draft PoM - Gardens of Stone Stage 2 - July 2022