



Bushwalking NSW



Monday 22 January 2024

The Hon Minister Penny Sharpe, MLC
Minister for the Environment
GPO Box 5341
Sydney NSW 2001

Dear Minister Sharpe,

Gardens of Stone accommodation lease notice

We are delighted with your decision not to proceed with a lease for an amusement style theme park at Lost City in the Gardens of Stone/Walawalang Malang State Conservation Area (your letter MD23/5708 of 12/12/23). The Gardens of Stone Alliance hopes that the reserve's plan of management may soon be amended to reflect your decision so that a future administration may not easily reverse it.

As you may know, in the 2022 the lease notice for the proposed accommodation hubs received more than 1000 objections, just as many as the Lost City theme park, and more than 300 submissions to the draft plan of management strongly objected to the proposed commercial leases.

The substance motivating these objections to on-park commercial accommodation hubs included:

- The three proposed accommodation hubs being located on remote, pristine ridgelines, contrary to NPWS sustainability guidelines¹ - into each pristine area would be installed a facility comprised of six twin bed units, a common lounge-dining area, a toileting block, cooking facilities, servant quarters, and a 4WD access road;
- Accommodation hub site 3 is east of Birds Rock above a tributary of Carne Creek and affords views of this pagoda lined gully. Site 4 overlooks another tributary of Carne Creek and site 5 is in the upper Carne Creek valley. Concealment of the proposed accommodation hubs may prove impossible. The views enjoyed by patrons of these resorts means that the views for other visitors to this reserve may be spoiled by these facilities, its roads and vehicles servicing the resorts.
- A monopoly reserve accommodation lease is a bad tourism model where on-reserve environmental impacts of accommodation at three sites are relatively large and the spinoff community benefits small. Wild Bush Luxury Experience will be a “closed-circuit” operation, with their high-paying guests ferried to the walking track or accommodation hub, then ferried out at the end of their stay, so that interactions with the Lithgow economy are kept to a minimum.
- The services proposed by Wild Bush Luxury Experience for its closed circuit tourism will only provide about 2 guides per 14 guests to perform the cooking, cleaning and guiding services. The small job numbers for the proposed accommodation hubs and walk do not offset the on-reserve environmental impacts at the three accommodation hub sites.
- The three accommodation hubs may start as canvass cabins for a multi-day walk, but over time such facilities usually evolve into larger structures with more services (carparks, access, water, sewage, electricity) due to economic growth. The further damage to the reserve due to economic growth under this lease process is not considered, despite being likely. Further the National Parks and Wildlife Act does not require public consultation for lease variations and renewal, so there may be no opportunity for the public to oppose further developments.

NSW Environment groups have a long-standing objection to commercial accommodation in national parks and reserves and in this reserve. Experience Co, the parent company of Wild Bush Luxury, seeks to develop wilderness in the Tasmanian Wilderness World Heritage Area. A company undertaking pristine wilderness development should not be allowed entry into NSW reserves as a matter of principle.

¹Department of Env, Climate Change and Water, February 2011, Sustainability assessment criteria for visitor use and tourism in New South Wales national parks, Appencic C, page 21, new buildings and structures, “Avoid: locating facilities on ridgelines or hill-tops and in drainage flow-paths”

We hope that you may review your decision to issue a lease notice for commercial accommodation in this reserve because the proposed facilities would impact pristine areas, draw visitors away from other nearby high end accommodation facilities in Lithgow and have a high opportunity cost through non-delivery of lower impact park facilities.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K. Min', written in a cursive style.

For the Gardens of Stone Alliance

Gardens of Stone Alliance

C/- Australian Foundation for Wilderness Limited. ACN 001 112 143 ABN 84 001 112 143

*Advocating as Wilderness Australia. Formerly The Colong Foundation for Wilderness Ltd.
PO Box K335, Haymarket, 1240, NSW. Registered Office 10/154 Elizabeth Street Sydney NSW 2000.*

Telephone (02) 9261 2400

www.wildernessaustralia.org.au

contact@wildernessaustralia.org.au