

# Bushwalking NSW

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Manager  
Property and Lease Management Unit  
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PARRAMATTA NSW 2124

19 June 2024

## NOTICE OF INTENTION TO GRANT A LEASE – GARDENS OF STONE SCA

Dear Sir/Madam

Bushwalking NSW Incorporated is the peak body for bushwalkers in NSW and the ACT. It represents the interests of over 11,000 bushwalkers from over 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 (as well as other activists) 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.

Bushwalking NSW is dismayed with the intention by the NSW Government to grant a lease to Wild Bush Luxury Experience (WBLE) to develop and operate three accommodation and associated infrastructure nodes within the Gardens of Stone State Conservation Area.

We support the submission already lodged on behalf of the Gardens of Stone Alliance and need not repeat the Alliance's full submission here.

Bushwalking NSW considers that the Notice of Intention should be withdrawn, and the proposed accommodation should not go ahead within the Gardens of Stone SCA or any other national park-estate.

We have reached this position for the following reasons:

### Back to front planning for the Gardens of Stone SCA

We have long held reservations about the approach taken to planning for the SCA. There appear to have been two separate planning processes implemented. The Plan of Management states:

*This plan provides for the development of a multi-day walk and associated camping areas that will be publicly accessible. Low-impact, small-scale accommodation may be developed as an alternative for walkers and operated under a lease or licence by a private sector partner. Any future accommodation on the multi-day walk will be sited and designed to ensure that it has a minimal visual and environmental impact and does not compromise the experience of walkers. (p11 Gardens of Stone SCA Plan of Management).*

Parallel to this was a route selection process including the siting of the private accommodation precincts that by-passed public consultation and appears to have been driven by the needs of the private developer. We do not consider that the final route of the Great Walk suits the interests of walkers who will not be staying at the private accommodation.

It is a pity that individual bushwalkers who know the area intimately were not involved in the route selection process.

## **Proposed lease is not compliant with s.151 NPW Act**

Bushwalking NSW has reservations about the compliance of the proposed locations with the Act. Firstly, the precise locations of the accommodation are not shown. The polygons selected show only approximately the locations of the accommodation and give the developer wide scope to finalise the locations within the polygons. There are also errors with the grid locations published in the Notice.

We consider that the Notice should have provided precise locations for the proposed accommodation.

## **Proposed lease is not compliant with NPWS Sustainability Guidelines**

The 2011 Sustainability Guidelines are to guide visitor use and tourism in NSW national parks. These guidelines detail the steps to be taken when planning and assessing proposals requiring a lease or licence under s.151 of the Act.

Bushwalking NSW considers that the lease is inconsistent with the planning requirements set out in the Guidelines as it is stated that:

*leases and licences may only be granted for visitor and tourist uses under s.151A that authorise a new building or structure (such as an accommodation facility) if the purpose is identified as permissible in the plan of management and the general location of the new facility is identified in the plan.* (page 4 Sustainability Guidelines for visitor use and tourism in NSW national parks).

The Notice of Intention does not adequately describe the location of the accommodation.

Further, we would argue that the proposed locations do not adequately meet the site suitability tests that the Guidelines require given that the environmental impacts of built accommodation and associated infrastructure amongst pagodas and cliff lines are significant. In particular, impacts from the disposal of wastewater, visual intrusion (including on other users of the Great Walk), linked walking tracks and myriad other impacts from clearing unmodified bushland should make this proposal inconsistent with the conservation goals of the NPWS.

Again, it is noted that the Plan of Management states that accommodation on the Great Walk will be sited and designed to ensure that it has a minimal visual and environmental impact and does not compromise the experience of walkers (page 11).

We consider that the lease as proposed does just that: it compromises the experience of walkers and does not minimise visual and environmental impact.

The environmental and cultural sensitivity of the Gardens of Stone has also been recognised by other public agencies such as the Planning Assessment Commission. The lease proposal in amongst cliff lines and pagodas does not respect this sensitivity.

## **A precedent for private accommodation in national park-estate**

Bushwalking NSW considers that the lease proposal represents a regrettable precedent for private accommodation in most parts of the national park network in NSW. We have no objection to commercial walking companies responsibly using the tracks and trails in national parks but draw the line at siting supporting infrastructure such as accommodation inside the boundaries of the parks.

## Bushwalking NSW Inc.

Over one hundred years ago bushwalkers began mapping and lobbying for the conservation of tracts of bush that eventually became our great system of national parks in NSW. It is sad to see that this legacy is being threatened by private encroachment into places such as the Gardens of Stone. What other parks will be next?

The Minister for Environment and Energy should not enter into a lease with WBLE.

Yours faithfully,

A handwritten signature in black ink that reads "David Bell". The signature is written in a cursive, flowing style.

David Bell  
President  
Bushwalking NSW Inc.