

4 July 2022

The Manager
Planning and Assessment
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Dear Manager,

Australian Plants Society NSW Submission on Future Management of Gardens of Stone State Conservation Area

The Australian Plants Society NSW Limited (APS NSW) is committed to growing, conserving and promoting Australian native plants.

We applaud the Gardens of Stone area being protected in a State Conservation Area (SCA). It is a 28,332 ha area of rare scenery including internationally significant pagoda landscapes and very large diversity of native flora. These assets can now be protected by being managed as a SCA and can attract many visitors who can learn and get close to nature while enjoying newly developed and sensitively managed recreation facilities. The proximity of the large population centre of Sydney creates a need for scenic enjoyable day or short trip destinations, as can be already seen by the popularity of the adjacent popular Blue Mountains which is now crowded as a result. The new Gardens of Stone SCA has great potential as an alternative destination and with appropriate tourism development can boost the economy, community and environment of Lithgow in its new role as a major eco-tourism hub and service centre. Local tourism associated future employment opportunities are especially important as there has been declining employment in local heavy industry, coal mining and power generation.

Being the Australian Plants Society NSW, we are naturally excited about the great flora diversity that is one of Gardens of Stone's greatest assets. Many renowned botanists in the past recognised this and did specimen collecting in the area as is attested to by many of the local plant species bearing their names. Lithgow Environment Group, who are very knowledgeable about the local flora estimate, that there are around 1,400 native plant species in the new Gardens of Stone SCA, making it the 5th most floristically biodiverse NPWS Reserve in NSW. We are keen that future visitors learn about the flora and get to value it and that development plans make the protection of native plants paramount, especially the many endangered species and plant communities. The Gardens of Stone SCA has extra value as a high altitude refuge for plants from climate change and usually, though not lately, from bushfire.

Benefits as we see them

- Current and past use of much of the area has been inappropriate, damaging and illegal and has resulted in unsightly eroded tracks and bush degradation. Future formalising of family friendly 2WD access roads, along with repair and restoration of damaged parts will ensure a chance for bush recovery. This includes the rehabilitation of former pine forests to restore natural environments.
- The setting up of nature-focused basic visitor facilities of campgrounds, walking tracks, carparks and lookouts that should be constructed on already disturbed land and serviced by good 2WD roads that everyone can use. It is good that riding motorised trail bikes off road will be prohibited. Multi-day walking tracks would be a welcome feature for bushwalkers and nature-lovers.
- It is good that Traditional Owners will have the opportunity to care for and share their country that is rich with Aboriginal Culture for all to learn about.

Recommendations

- We consider that the 'Lost City' is of such iconic visual importance that any Zip-line and Via ferrata activity should not be here but instead moved to a re-located adventure activity hub in State Mine Gully. Additionally, an adventure theme park located at the Lost City would be partially in a former Flora Reserve and hence disrespecting the conservation purpose of the area. The vegetation at Lost City is vulnerable and exposed. Moving of the Adventure Park to State Mine Gully would have the advantage of encouraging entry into the SCA via Lithgow and encourage visitation to the State Mine and Railway Museum. Blocking off or at least making it a very undesirable option to access to the SCA via the Old Bells Line of Road at Clarence would be even more effective in directing traffic via Lithgow. Entry through Lithgow would also be a much more visually attractive SCA entry point alternative and also much better for the town's economy.
- We think that given the great natural assets of the Gardens of Stone SCA area that there should be a heavy emphasis on environmental restoration. That would enhance the visitor experience greatly too and attract more visitors. There are significant biodiversity offset funds available for this work. Budgeting for the setting up of Adventure tourism, while it has its place, should not compromise the remediation budget.
- NSW Government needs to conduct a comprehensive Flora Assessment of the area. That is, it needs to know what flora assets it is dealing with in order to better plan the developments. As was mentioned in the Draft Plan of Management, 42 rare or threatened plant species occur in the SCA. The Lithgow Environment Group (LEG) knows of 48. Further the Draft Plan of Management says there are over 1,000 plant species, LEG estimates about 1,400. Again, the Draft Plan of Management mentions 33 vegetation communities, only 3 of which are threatened it is claimed. LEG lists 33 vegetation communities and 16 endangered ecological communities. These discrepancies show the need for a comprehensive flora assessment after which more appropriate management regimes can then be applied.
- APS NSW would be happy to work with NPWS and local environment groups to further develop the knowledge and promotion of the magnificent floral diversity of the new SCA as we have data and plant lists.
- NPWS should consider risks of weed proliferation brought in by high visitation and activities such as 4W Driving, mountain biking and horses being examples.
- Mountain biking tracks should not be constructed in areas where there is intact good quality bush but rather in already degraded areas.
- Multi-day walking tracks with basic overnight campsites, rather than accommodation operated by a private sector partner will cause less bush disturbance.
- We are concerned that there should be minimal disturbance of the SCA's existing native bush area in general. Road routes, camping areas and associated infrastructure, lookouts and approaches and carparking areas potentially could lead to much bush disturbance. An example is improving the car parking at Dobbs Drift. This should not be extended beyond the current footprint of disturbed area. Adjacent are patches of ground orchids Flying Duck orchid *Caleana major* and Cow orchid *Cryptostylis subulata* as well as drifts of Pink Flannel Flower *Actinotus forsythii*. Although these are not threatened species, they are a delightful find there. They have survived, even thrived as a result of the recent fire. The Australian bush is resilient but it can't recover from the impact of bulldozer.

Thank you for the opportunity to comment on the Gardens of Stone SCA Draft Masterplan.



Heather Miles, President, Australian Plants Society NSW