



Lithgow City Council
Response to Gardens of Stone
State Conservation Area Master Plan

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Introduction

Lithgow City Council is supportive of the overarching concepts presented within the draft Master Plan as it relates to the Gardens of Stone State Conservation Area. We see the SCA as an extension of our greater City, in that it offers significant opportunity for recreational tourism because of its natural endowments, cultural values and heritage offerings.

Combined with current and future offerings such as the Zig Zag Railway, Wollemi National Park and the multitude of other walking, riding and sight-seeing experiences, Lithgow represents a substantial tourism package that will enhance visitation and provide a wide range of economic benefits to our region.

Lithgow City Council has witnessed the considerable interest of local stakeholders to contribute to and participate in the management of this site, and delivery of outcomes associated with the Gardens of Stone. Our submission focusses on the need to blend these perspectives and provide social, economic, health and wellbeing benefits to a local community while also meeting the needs of visitors from further afield.

1. Emergency Management

Lithgow and its surrounds are endowed with extensive bushland, exhibiting a rich ecosystem of flora and fauna. These bushlands often blend with our urban environment, blurring the boundaries of recreational and residential lands.

It is in this context that we seek your address of bushfire risk as it relates to the Gardens of Stone SCA. The 2019-20 bush fires were some of the worst in the world and in recorded history. The findings of the NSW Bushfire Inquiry aim to improve how NSW plans and prepares for, and responds to, bush fires to better protect our environment and minimise damage to property.

It is Council's view that the Gardens of Stone SCA Draft Master Plan does not appear to adequately respond to the significant responsibility held to appropriately manage this land with respect to bushfire risk.

The Gardens of Stone State Conservation Area is vast and will require significant investment of funds and resources in perpetuity to manage the risk of bushfire.

There is growing recognition of the role that indigenous people's knowledge of land management can be applied to the challenge of managing bushfire risks. Northern Australia is at a more advanced phase of involvement of indigenous people in this regard. It would seem there is the potential to draw from that and train and employ local indigenous people in such practices.

Closely related to emergency management is communication infrastructure through the Gardens of Stone SCA. Council's experience during recent bushfires and floods has highlighted the limited capacity of our regional mobile network. Depending on the level of expected visitation, poor connectivity and telecommunications infrastructure could represent a significant risk.

While the installation of such infrastructure is closely related to commercial viability (from the perspective of the Telco), feasibility and cost, Council strongly recommends that National Parks and Wildlife Services advocate through existing funding programs (such as the Federal Government's Mobile Blackspot Program) to seek the installation of such infrastructure. Similarly, Council requests that the permissibility of installing such infrastructure within a State Conservation Area remain a consideration.

To address this, Council suggests consideration of the following:

- *Regular checking and auditing to ensure that processes that are supposed to be followed are actually happening,*
- *Improved hazard reduction burning protocols to control bushfire loading,*
- *Scope the potential for the training, engagement and employment of local indigenous people in land management of the SCA through a ranger program or other means*
- *Appropriate provision for monitoring and communications to best ensure early detection and action,*
- *Adequate safety systems and equipment to respond in the event of disaster.*
- *Active bushfire management programs which maintain or improve the resilience of natural ecosystems.*
- *Investigate the feasibility of alternative access to the State Conservation Area to the north, from the Wolgan Valley to the Capertee Valley, in order to ensure the*

maximum viability and availability of alternative access in the event of a natural disaster.

- *Consider advocating for the installation of basic telecommunications infrastructure to reduce risk throughout the park, in response to the current frequencies of natural disasters.*



2. Indigenous Representation

The Draft Master Plan offers great opportunities to protect cultural heritage through the identification and conservation of sensitive sites. The Plan acknowledges the significance of embedding these stories into the place of the precinct using an interpretive approach that affords visitors the opportunity to learn of these values and their importance. The Plan surmises that this is to be achieved through collaboration and consultation with the Wiradjuri community.

It is Council's view that the enduring connections with our country should be respected by taking this commitment one step further. We suggest that there be indigenous representation at the core of the decision-making process, affording the Traditional Owners a strong voice in the strategic and operational management of the place. This inclusion would support management arrangements that have been in place for tens of thousands of years and ensure the thorough integration of cultural and environmental knowledge into contemporary SCA management.

Council's ask:

- *Create opportunity for indigenous voice within decision making processes that apply to the Gardens of Stone SCA.*



3. Community Partnerships

Many people have enduring connections and a strong sense of stewardship for the Gardens of Stone SCA and have a deep knowledge of the area developed over many years of living, working and creating in the SCA and this knowledge can enhance management. There are significant benefits for the parks from working together with surrounding land and catchment managers, with the local communities and local government and with recreation groups and the tourism groups to achieve shared management goals.

Similarly, we feel that the potential of community partnerships goes beyond the initial development of the site, and implementation of wayfinding and interpretive signage and the like. There is potential in this space to create meaningful opportunities for our local community to impart their cultural understandings and local knowledge through the delivery of iconic walks and other such experiences. Such deep involvement of the local community will improve upon the project's social outcomes in a local capacity, while also improving the immersion and value of the experiences on offer.

There is great potential for the lands which interface with the SCA to also play a part in a tourist offer. It would be beneficial to study how these private lands could carry sustainable tourism development compatible with the values of the SCA.

We ask that the Draft Master Plan consider that:

- *Volunteer programs and opportunities for involvement of local recreational and other groups will be maintained and expanded.*
- *Responsive and effective park stewardship with the community is expanded.*
- *A local procurement policy be introduced, which promotes engagement with the local community with respect to service provision and construction delivery.*
- *Establish a working party between National Parks, Dept of Planning and Lithgow Council to guide the development of a tourism supportive statutory planning environment for lands that interface with the SCA*

4. Blend of Environmental Protection with Active Adventure Tourism

The activation of this site blends several values to guide the creation of a sustainable tourism destination in NSW.

On one hand, the project acknowledges the dynamic set of challenges which confront the State's efforts to maintain or improve biodiversity, particularly in an area continuing to suffer the impacts of flood and fire. While it is important that we immerse our visitors in nature today, we must also ensure that our actions maintain or improve these experiences for future generations.

On the other hand, however, the project aims to enhance the recreational value of the site through built infrastructure and commercial offerings.

Lithgow Council is excited by the opportunity of commercial opportunities being delivered. These are not available in other National Park reserves across NSW. This offers a unique attraction to a large market and is aligned to Lithgow's immersive and active tourism character.

Tension can be created though between environmental protection and respect and human activity across the SCA. The restriction of activity and access to parts of the SCA will be as important as the alternates. There may also be a temporal element to this as visitation will surely increase over time given proximity to Sydney's population. The management plans are high level but it would appear that they are not sufficiently explicit in how this balance between character and acceptable intensification will be achieved.

Council is keen for visitation to surge so as to optimise the benefits for the city. But there should also be pauses to re-set the management plans to ensure that the imperative of environmental protection is not being over-run. There should be mechanisms of regular management plan reviews for this purpose – perhaps each 5 years.

Council strongly supports the proposed elimination of use by trail bikes, and the creation of discrete precincts within the SCA for purposes of 4wd recreation and other uses which may impact on environmental health and amenity.

Generally, Council is accepting of developing commercial experiences within the SCA, but request that a strong environmental overlay or context be applied to each. Also, because it

is not our province of expertise, we form no view about the correctness of the current siting of large physical infrastructure within the SCA relative to the values assigned to the locations by indigenous peoples. Extensive consultation with indigenous people should guide such placement of infrastructure.

With respect to built infrastructure, we understand that the motive of enhanced accessibility must be unified with sustainable environmental objectives. The Draft Master Plan acknowledges the variety of transport modes which when combined, represent a visitation strategy which is inclusive of access needs, recreational experiences, active transport opportunities and short-term accommodation. Council suggests that improvements can be made on this visitation strategy through the implementation of a transport hierarchy that is representative of the environmental and operational objectives of the Plan. We favour a bias toward active transport for much of the SCA. Where vehicles are to be permitted then that should be tightly limited.

Our suggested order for such a hierarchy is:

1. Pedestrian walking routes be afforded priority with respect to access.
2. Cycling routes.
3. Public transportation
4. Motor vehicles.

In our view, implementation of such an access plan will reflect the intent of the space and appropriately encourage low impact land use across the SCA. Similarly, by limiting vehicular access to primary routes and affording access to key viewpoints, attractions and campgrounds only will reduce recurrent maintenance requirements. Third, it is our suggestion that lengths of strategic fire trails, where possible, be gated and access by vehicle restricted. This speaks to the heart of Item 1 above, and better ensures the resilience of these assets should they be required for fire fighting purposes in the event of an emergency.

Once this plan has been adopted, a Traffic and Pedestrian Circulation Study can be developed to understand how people will move through the precinct. Based on NPWS understanding of expected visitation, the hierarchy of transport needs can be overlaid over

usage trends to inform any issues surrounding capacity, condition, safety, or other user needs which fall outside the immediate needs of the SCA.

Council's ask:

- *As far as reasonably practicable, continue work to eliminate the use of trail bikes within the SCA.*
- *Create discrete precincts which support varying activities, ensuring a broad range of experiences are available while protecting environmental health and amenity.*
- *Develop a visitation strategy or access plan which will broadly limit the use of motorised vehicles and promote a focus on active transport modes such as walking and cycling.*
- *Develop a traffic circulation study which seeks to understand how people move through the precinct, and in combination with the visitation strategy, understand the scope of infrastructure needs and upgrades.*

5. Local Services and Facilities

It is abundantly clear from the Draft Master Plan that the Gardens of Stone represents a package of opportunity, delivering a broad range of services, facilities, and experiences to a diverse range of people. Council is of the firm belief that once complete, this asset will become a drawcard for Lithgow, greatly increasing local visitation and thereby providing significant economic support for our transitioning community.

It is expected that this demand will result in greater consumption of contributing infrastructure, such as local roads and tourism assets. In some cases, as it is with State Mine Gully Road, many local assets are not built to the standard required to support the volumes of traffic expected from a development as large as the Gardens of Stone. We must identify those assets in advance of the Gardens of Stone development, to ensure that visitors are able to appreciate, enjoy and use the SCA without any adverse impacts on local assets.

Secondly, as noted previously, we acknowledge that the Gardens of Stone proposal has significant potential to provide flow-on benefits to the local business community. We ask for an opportunity to work closely with National Parks and Wildlife Services to draw attention

to the broad range of services that can contribute to the Gardens of Stone experience. With an overt commitment from the State Government, linking this project to the broader community, there are real opportunities for economic and social benefits to Lithgow's community.

Third, we note that State Mine Gully Road will form the primary access for the Gardens of Stone State Conservation Area. This asset also forms the primary access to the State Mine Museum, a key tourism and recreational asset depicting the history and heritage of our City. We consider that there is an opportunity here to combine interests and use the strategic location of the State Mine Museum as a main entrance to the Gardens of Stone. If we can achieve this, we can further blend the recreational opportunities offered by Lithgow and thereby present our City as a package of opportunity.

Council's ask:

- *Consideration for the upgrade of State Mine Gully Road as the primary access route to the Gardens of Stone.*
- *Pursue opportunities to partner with Council on the promotion of key local recreational activities and services, facilitating Lithgow's image as a provider of quality accommodation, food and other services that lie outside the Gardens of Stone,*
- *Conversely, seek Council's expertise and intimate local knowledge to ensure the SCA is adequately promoted, with information and interpretation offered through our local villages and like tourist destinations.*
- *Consider supporting the expansion of the State Mine Museum to act as a main entrance to the park, promoting the view of Lithgow as a package of recreational opportunity.*
- *Work with Lithgow Council to develop and implement a plan to link the SCA and Lithgow city centre*

6. Existing Land Uses

Mining, particularly in the Lithgow LGA, is an industry with distinctive characteristics. It is an industry of national and international significance, with the minerals and other resources produced being a key input into global production networks. Locally, mining has persisted for generations and has supported our townships and communities for an extended period. Reports indicate that over 75% of the employees at local mine sites live within 15 kilometres of the mine site. Until Council commences its planned transition away from coal through the diversification of the local economy, this industry plays a critical role in local economic activity, alongside the social and cultural benefits had by these local jobs.

As a project-based economic activity, each site represents a temporary land use, but many factors play a part in the viability of this activity. The capacity to continue over longer periods is not simply contingent on fluctuations in material pricing. Importantly, mine location is a distinctive feature of the industry, as is the regulatory context within which they operate.

In this case, it is understood that there is coal mining infrastructure scattered throughout the Gardens of Stone SCA site. This infrastructure represents important regional assets in that they support the ongoing exploration and monitoring of the site and are vital for the ongoing operation of the business. There is concern among key community stakeholders that the SCA declaration and Gardens of Stone Master Plan will result in reduced viability of this industry, as it relates to the bounds of this site.

Council is under no illusion regarding the need for sustainable mining operation which meets the needs of the present without compromising the ability of future generations to meet their own needs. However, these needs are not purely environmental. In the short term, while our community moves away from coal and related industries, there are social and economic responsibilities which must be met by all users of the space. Until such a time that green, renewable, but stable power generation and supply is a reality, economic development, environmental impact, and social responsibilities must be well managed, and productive relationships must exist between governments, industry, and stakeholders.

In this sense, Council asks National Parks and Wildlife Services to acknowledge that:

- *The need for mining and State Conservation Areas to co-exist.*
- *Underground mining and supporting services will continue.*
- *Access to existing and future infrastructure is critical and must continue.*
- *Future mining will require ongoing exploration and establishment of additional monitoring infrastructure.*
- *A productive relationship between all stakeholders in the management of the site are required to ensure the diverse needs of our local and regional communities are met.*

Conclusion

As suggested at the outset of this response, Lithgow City Council is supportive of the project, and appreciative of the opportunity to respond to the Gardens of Stone State Conservation Area Master Plan. Combined with upcoming recreational opportunities such as the Zig Zag Railway, Wollemi National Park and the multitude of other walking, riding, and sight-seeing experiences, we see Lithgow becoming a substantial tourist destination of NSW.

It is our hope, that with a focus on collaboration with local stakeholders, the Gardens of Stone can blend these new experiences with Lithgow's existing cultural values and heritage offerings while building upon the already significant social, economic, health and wellbeing benefits that the project stands to provide.

