

Review of Environmental Factors

Wild Bush Luxury

Bush camps and supporting infrastructure

Gardens of Stone State Conservation Area



Prepared by Ecoplan Projects
For NSW National Parks and Wildlife Service
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Attachments

- Attachment A** Gardens of Stone Pagoda Walk Bush Camp Response (Ingrid Donald Architects October 2025)
- Attachment B** Gardens of Stone State Conservation Area Aboriginal Heritage Assessment (Kelleher Nightingale Consulting Pty Ltd December 2025)
- Attachment C** Ecological Assessment Report Wild Bush Luxury Bush Camps (Lesryk Environmental Pty Ltd November 2025)
- Attachment D** Native Title Claimants Response to Future Acts Notification (Warrabinga Native Title Claimants Aboriginal Corporation 1 September 2025)
- Attachment E** Site suitability assessment by NPWS (November 2025)
- Attachment F** Sustainability Assessment for built facilities and structures (prepared by Ingrid Donald Architects for Wild Bush Luxury 10 October 2025)
- Attachment G** Report on Investigations and Assessments for the Siting of Proposed Effluent Management Systems at Gardens of Stone State Conservation Area – Bush Camp Zones 1–3 (Blue Mountains Geological and Environmental Services October 2025)
- Attachment H** Wild Bush Luxury Bush Camp Proposal Landscape Character and Visual Impact Assessment Report (Environmental Partnership October 2025)
- Attachment I** Gardens of Stone Pagoda Walk Proposal to grant a lease (2024)
- Attachment J** Historic Heritage Information Management Systems (HHIMS) records
- Attachment K** Aboriginal Heritage Information Management System (AHIMS) records

Document control

Version	Date	Author/ Modified by	Approved by
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1. Introduction

This Review of Environmental Factors (REF) has been prepared by Ecoplan Projects on behalf of the National Parks and Wildlife Service (NPWS) to support the construction and operation of bush camps and supporting infrastructure at three sites within the Gardens of Stone State Conservation Area (SCA).

The Gardens of Stone Pagoda Walk is a 3- to 4-day walk that traverses the Gardens of Stone SCA, Gardens of Stone National Park and Wollemi National Park. The new public 30km walk is currently under development by NPWS in collaboration with leaders in remote walking track establishment and includes the establishment of two public NPWS campgrounds for independent walkers and small, guided groups.

The new walking track will accommodate independent walkers and small, guided groups who can access the public NPWS campgrounds year-round. In addition to the public campgrounds, the bush camp activity proposal considered in this REF will allow for a supported multi-day walking experience with accommodation. Use of the walking track by independent walkers will not be restricted by Wild Bush Luxury activities.

The bush camps and associated infrastructure will be funded, constructed, maintained and operated by an independent tour operator for a 4-day, 3-night supported walking experience on the Gardens of Stone Pagoda Walk (referred to as the Gardens of Stone Multi-Day Walk in the notice of intent to lease public consultation) under a lease arrangement with NPWS. Wild Bush Luxury Experience Pty Ltd (Wild Bush Luxury) was selected as the preferred operator following an expression of interest process in 2022.

The intent to grant a lease to Wild Bush Luxury to develop and operate the bush camps at the three sites within the Gardens of Stone SCA was subject to public consultation in 2022 and again in 2024, with a Review of Environmental Factors (REF) now required to assess potential impacts.

This REF seeks to provide planning approval under Division 5.1 of *the Environmental Planning and Assessment Act 1979* (EP&A Act) and Clause 171 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation) for the construction of the bush camps and associated infrastructure, and ongoing operations.

The proposed activity carried out by, or on behalf of a public authority, is permitted without consent in accordance with Section 2.73(1)(a) of State Environmental Planning Policy (Transport and Infrastructure SEPP) 2021 (Transport and Infrastructure SEPP) as it is to be carried out on land reserved under the *National Parks and Wildlife Act 1974* (NPW Act) and is for a use authorised under that Act. Further detail is available in Section 6 of this REF.

Following REF determination, the bush camps are proposed to be constructed and operated under a lease authorised by section 151 NPW Act.

1.1 Purpose of Report

The purpose of this REF is to describe the proposal, to document its potential impacts on the environment, and detail protective measures to be implemented to mitigate impacts.

NPWS, as the determining authority, has a duty to consider the environmental impacts of the proposal in accordance with Division 5.1 of the EP&A Act and Clause 171 of the EP&A Regulation. As required, this REF examines, and takes into account to the fullest extent possible, all matters affecting or likely to affect the environment as a result of the proposed activity.

1.2 Project Overview

Table 1 provides a high-level description of the proposed activity:

Table 1. Project Overview

Proposal name	Wild Bush Luxury Bush camps and supporting infrastructure
Brief description	Construction, maintenance and operation of three bush camps and supporting infrastructure including road improvements, cabins, communal structures, amenities, water tanks, signage, water treatment for greywater, and removal and off-site disposal of toilet waste.
Location of activity	Gardens of Stone SCA, as shown in Figure 1 .
Name of NPWS park or reserve	Gardens of Stone SCA
Description of any unreserved land	N/A
NPWS Area	Kanangra Area, Blue Mountains Branch
Council	Lithgow City Council
NSW State electorate	Bathurst
Estimate capital cost of project	\$3.5 million
Estimated duration of project	6 months for construction, up to 20 years for operation (proposed as an initial 10-year term plus two 5-year options).
Proposed commencement date	To be confirmed pending REF determination.
Proposed completion date	The duration of the proposed work is estimated at 6 months. Work to be staged, with each bush camp site delivered as a separate package. Operations will continue for up to 20 years.

The REF will be subject to a public exhibition and submissions process, which will ensure community members and other stakeholders have an opportunity to review and comment on the proposal.

A detailed description of the proposed activity is provided at Section 6 of this report and the architectural report is at **Attachment A**.

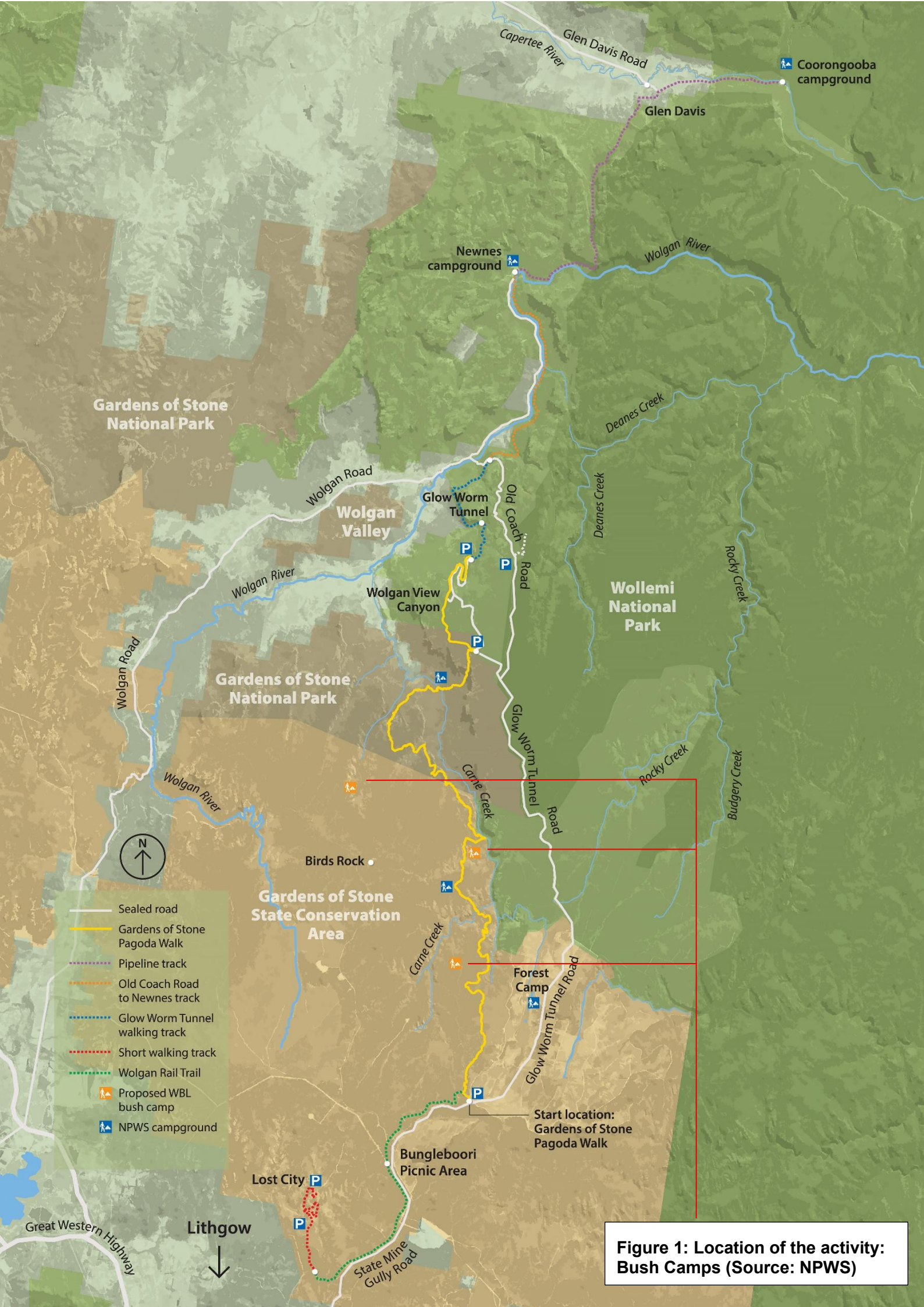


Figure 1: Location of the activity: Bush Camps (Source: NPWS)

2. Proponent's details

The site is reserved as part of Gardens of Stone SCA, and NPWS is the proponent for this REF.

Table 2. Proponent's details

Contact name	Soren Mortensen
Position	Principal Project Officer - Infrastructure Program Team
Street address	33-39 Acacia St Katoomba NSW 2780
Contact phone number	02 4784 7300
Email	Soren.mortensen@environment.nsw.gov.au
Area Manager or Unit Manager	Angela Lonergan – Kanangra Area Manager

3. Permissibility and assessment pathway

3.1 Permissibility under NSW legislation

The following sections outline how the proposed activity is permissible under applicable NSW legislation.

3.1.1 National Parks and Wildlife Act 1974

On land reserved or acquired under the National Parks and Wildlife Act 1974

The proposal is consistent with the objects of the NPW Act as it is considered to allow visitor and tourist accommodation and supporting infrastructure without resulting in an adverse impact on the environment. An assessment against the objects of the NPW Act is provided below:

Table 3. Consistency with the objects of the NPW Act

Object	Consistency
<p><i>Section 2A(1)</i></p> <p>(a) <i>the conservation of nature, including, but not limited to, the conservation of—</i></p> <p>(i) <i>habitat, ecosystems and ecosystem processes, and</i></p> <p>(ii) <i>biological diversity at the community, species and genetic levels, and</i></p> <p>(iii) <i>landforms of significance, including geological features and processes, and</i></p> <p>(iv) <i>landscapes and natural features of significance including wilderness and wild rivers,</i></p>	<p>Consistent - The proposed activity is located in the SCA and utilises existing access trails in a park where the landscape is already heavily modified. The proposal includes minimal built form and does not impact any threatened ecological community and will not result in any significant loss of vegetation that would support species diversity. The pagoda formations that are significant to the landscape will not be impacted by the proposal. See Section 8.2.</p>
<p>(b) <i>the conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including, but not limited to:</i></p> <p>(i) <i>places, objects and features of significance to Aboriginal people</i></p> <p>(ii) <i>places of social value to the people of New South Wales</i></p> <p>(iii) <i>places of historic, architectural or scientific significance,</i></p>	<p>Consistent - The proposed activity avoids objects, places or features (including biological diversity) of cultural value within the landscape.</p> <p>An Aboriginal Cultural Heritage Report has been prepared for the Gardens of Stone SCA by Kelleher Nightingale Consulting Pty Ltd (KNC) (December 2025) (Attachment B).</p> <p>The report identifies no impacts to Aboriginal cultural heritage as part of the accommodation nodes (see Section 8.3.1). There are also no heritage items impacted by the proposal.</p>
<p>(c) <i>fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation,</i></p>	<p>Consistent - The proposed activity, combined with the Pagoda Walk, will provide greater accessibility to the park's natural environment, fostering public appreciation, understanding and enjoyment of the natural, cultural heritage and recreational values. The proposed activity will provide for a wider range of visitors, including those who may not have the equipment or experience for self-supported camping and for those who would prefer to experience the walk in a safe and supported environment. The proposed activity will not restrict public access and use of the Gardens of Stone Pagoda Walk.</p>

<p>(d) <i>providing for the management of land reserved under this Act in accordance with the management principles applicable for each type of reservation.</i></p>	<p>Consistent - See Reserve management principles (s.30E–30K)</p>
<p><i>Section 2A(2) The objects of this Act are to be achieved by applying the principles of ecologically sustainable development.</i></p>	<p>Consistent - The principles of ecologically sustainable development include:</p> <ul style="list-style-type: none"> • the precautionary principle – minimise impacts and environmental damage • intergenerational equity – ensuring the health, diversity and productivity of the environment are maintained or enhanced for future generations • conservation of biological diversity and ecological integrity – biodiversity surveys and assessments have guided the development of the proposal to minimise environmental impacts • improved valuation, pricing and incentive mechanisms – the proposal has taken into consideration valuation of assets and services to ensure the proposal is developed in a cost-effective way. <p>This REF has been guided by these principles when assessing the potential impact of the proposal, taking a precautionary approach to mitigate potential impacts. The proposal is considered to be ecologically sustainable within the meaning of the above principles.</p>

Section 2A(3) requires the consideration as to whether the proposed activity is in the public interest in the protection of the values for which land is reserved under this Act and the appropriate management of those lands. The proposed activity is located in a State Conservation Area which allows for sustainable visitor and tourist accommodation, in locations within the park that are already accessible by service roads and in locations which do not include threatened ecological communities or Aboriginal cultural heritage. The proposed activity seeks to minimise its footprint, both physically and environmentally. For this reason, it is considered that the proposed activity is within the public interest.

Reserve management principles (s.30E–30K)

Section 30G(1) outlines the purpose of reserving land as a state conservation area is to identify, protect and conserve areas that contain significant or representative ecosystems, landforms or natural phenomena or places of cultural significance, and which are capable of providing opportunities for sustainable visitor or tourist use and enjoyment, the sustainable use of buildings and structures or research, or other opportunities permitted under the NPW Act.

The proposed activity is consistent with this purpose of a state conservation area, providing opportunities for sustainable visitor/tourist use and sustainable use of buildings and structures while protecting and conserving significant ecosystems, landforms and places of cultural significance.

As outlined in Table 4, the proposed activity is consistent with the management principles of a state conservation area as outlined in Section 30G(2) of the NPW Act.

Table 4. Consistency with the management principles of a state conservation area

Management Principle	Consistency
<i>Section 30G(2)</i>	
(a) <i>the conservation of biodiversity, the maintenance of ecosystem function, the protection of natural phenomena and the maintenance of natural landscapes,</i>	Consistent - The proposed activity is located in the SCA and utilises existing access trails in a park where the landscape is already heavily modified. The proposal does not impact any threatened ecological community and will not result in any significant loss of vegetation that would support species diversity. The proposed greywater treatment on site will ensure that the discharge from the system does not pose a threat to the quality of ground waters or surface waters. The pagoda formations that are significant to the landscape will not be impacted by the proposal (see Section 8 and Attachments C and F).
(b) <i>the conservation of places, objects and features of cultural value,</i>	Consistent – The proposed activity avoids objects, places or features (including biological diversity) of cultural value within the landscape. An Aboriginal Cultural Heritage Report has been prepared for the Gardens of Stone SCA by Kelleher Nightingale Consulting Pty Ltd (KNC) (December 2025) (Attachment B). The report identifies no impacts as part of the accommodation nodes (see Section 8.3.1). There are also no heritage items impacted by the proposal.
(c) <i>provision for the undertaking of uses permitted under other provisions of this Act in such areas having regard to the conservation of the natural and cultural values of the state conservation area,</i>	Consistent - provide continued understanding and enjoyment of the natural, cultural heritage and recreational values, as considered in Section 8.
(d) <i>provision for sustainable visitor or tourist use and enjoyment that is compatible with the conservation of the state conservation area's natural and cultural values and with uses permitted under other provisions of this Act in such areas,</i>	Consistent - The proposal allows for sustainable visitor accommodation that does not adversely impact natural or cultural values, as considered in Section 8.
(e) <i>provision for the sustainable use (including adaptive reuse) of any buildings or structures or modified natural areas having regard to the conservation of the state conservation area's natural and cultural values and with uses permitted under other provisions of this Act in such areas,</i>	Consistent - The proposal allows for sustainable visitor accommodation that does not adversely impact natural or cultural values, as considered in Section 8.
(f) <i>provision for appropriate research and monitoring.</i>	Consistent – the proposal does not adversely impact research or monitoring within the SCA.

Gardens of Stone State Conservation Area Plan of Management

The NPW Act requires a plan of management to be developed for each state conservation area and requires operations in park to be in accordance with a plan of management. The Gardens of Stone SCA Plan of Management was adopted by the Minister for Environment and Heritage under the NPW Act on 7 November 2022.

The Gardens of Stone State Conservation Area Plan of Management (Plan of Management) (DPE 2022) identifies that certain commercial activities are authorised in the Gardens of Stone SCA. This includes the development and operation of visitor accommodation in up to 4 of the 5 identified multi-day walk visitor accommodation nodes, which are identified in **Figure 2**. The Plan of Management also identifies that commercial tours may be allowed.

The proposed activity is consistent with the activities authorised in the Gardens of Stone SCA, providing visitor accommodation in three of the five identified multi-day walk visitor accommodation nodes (nodes 3, 4 and 5 in the Gardens of Stone SCA plan of management, **Figure 2**), and providing guided tours of the Pagoda Walk by a commercial operator.

The Plan of Management identifies four management outcomes relevant for the Gardens of Stone SCA. The four management outcomes consistent with the proposed activity are outlined below:

1. Supporting Wiradjuri aspirations for Country – the proposal minimises impacts on Country, does not adversely impact any Aboriginal objects and will prioritise cultural partnerships considering cultural staff, cultural awareness training and potential business partnerships.
2. Setting a sound foundation for the conservation of biodiversity – the proposal is located in areas of the park where the landscape is already heavily modified. The proposal does not impact any threatened ecological community and will not result in any significant loss of vegetation.
3. Assisting the recovery of a landscape under stress – the proposal looks to minimise any additional impacts on the park, by using existing service trails and minimising additional impacts.
4. Establishing a major new visitor destination in the greater Blue Mountains – the proposal is directly consistent with the outcome to establish a major new visitor destination in the greater Blue Mountains. It provides carefully designed high-quality facilities and will attract a broader range of visitors to enjoy the park.

The proposed activity is consistent with the purposes for which a lease may be granted under section 151A NPW Act, in that it enables the provision of accommodation for visitors and tourists for purposes related to sustainable visitor or tourist use and enjoyment of the reserved land.

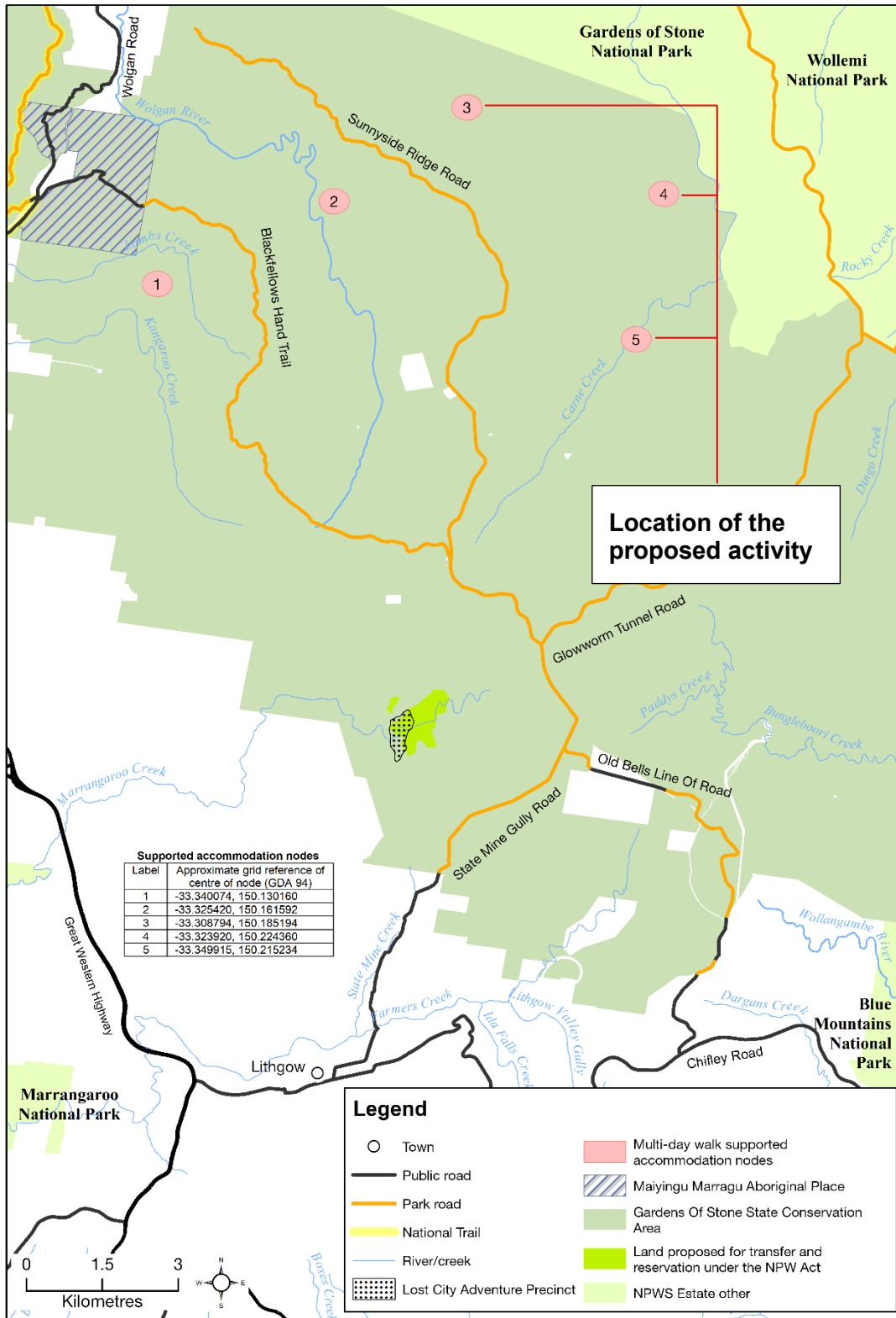


Figure 2: Location of multi-day walk visitor accommodation nodes (Source: DPE (2022) Plan of Management p.13)

Gardens of Stone State Conservation Area Visitor Infrastructure Master Plan

The Plan of Management is supported by the *Gardens of Stone State Conservation Area Visitor Infrastructure Master Plan* (DCCEEW 2025). The Wild Bush Luxury proposal aligns with the plan's aims to establish the park as a major sustainable visitor destination, delivering economic, social and community benefits. The proposal is consistent with the identified objectives. Furthermore, the master plan provides a framework for planning objectives which align with the proposed activity (Table 5).

Table 5. Gardens of Stone SCA Infrastructure Master Plan planning strategies

Objective	Consistency
3.3.1 Geology, topography and soils	
<ul style="list-style-type: none"> Protect the area's unique geodiversity and geomorphology Sustainably manage visitor access and use to protect the stability and condition of geology and soils 	Consistent - the proposal will not involve access to pagoda formations and visitor access will be limited to 10 participants and 2 guides for 6-8 months of the year. Road improvements, including appropriate drainage, will improve stability and soil condition while minimising potential adverse impacts.
3.3.2 Water management	
<ul style="list-style-type: none"> Protect endangered ecological communities and creek systems to maintain healthy hydrological systems Sustainably manage recreational use with appropriate park planning which addresses track erosion and associated impacts 	Consistent - the proposal includes water use restrictions and a greywater treatment system to ensure that the discharge does not pose a threat to the quality of ground waters or surface waters. Road improvements including provision of appropriate drainage will minimise track erosion. Toilet waste will be fully contained and removed by helicopter to minimise impacts.
3.3.3 Habitat management	
<ul style="list-style-type: none"> Conserve, manage and enhance ecological values of the park Sustainably manage recreational use to protect biodiversity values 	Consistent - the proposal minimises impacts to vegetation and is not located near threatened ecological communities.
3.3.4 Cultural Heritage – Wiradjuri	
<ul style="list-style-type: none"> Conserve, manage and enhance cultural values of the park, including protection of identified Wiradjuri sites 	Consistent - the proposal does not impact any identified sites or Aboriginal cultural heritage values.
4.4 Vehicular access	
<ul style="list-style-type: none"> Better protect the park's natural and cultural values Cater for a diverse range of visitors and future experiences Provide appropriate maintenance and resourcing 	Consistent - the proposal improves existing degraded service trails to support access to the bush camps.
4.5 Gardens of Stone Pagoda Walk	
<ul style="list-style-type: none"> The Pagoda Walk has been developed in response to a growing demand for nature-based experiences that evoke a sense of discovery and connection to natural values. 	Consistent - the proposal supports the Pagoda Walk, providing high-quality accommodation for guided walkers.

Objective	Consistency
<ul style="list-style-type: none"> The newly established track will accommodate independent walkers and supported, guided walkers. 	
4.9 Visitor services and amenities	
<ul style="list-style-type: none"> Provide access to a diverse range of nature-based experiences that meet visitor expectations and align with park values Provide unique and memorable experiences to encourage repeat visitation 	Consistent - provides walk-in bush camp sites associated with the Pagoda Walk, including basic amenities to support sustainable use.
4.11 Camping and visitor facilities	
<ul style="list-style-type: none"> Provide opportunities for low-impact accommodation to be established within the park as part of a supported walking experience. 	Directly consistent – provides walk-in, low-impact bush camp sites associated with the Pagoda Walk as part of a guided walking experience.

The location of the bush camps and proposed supported walking connecting tracks are consistent with the Gardens of Stone SCA visitor infrastructure master plan (see **Figure 3**).

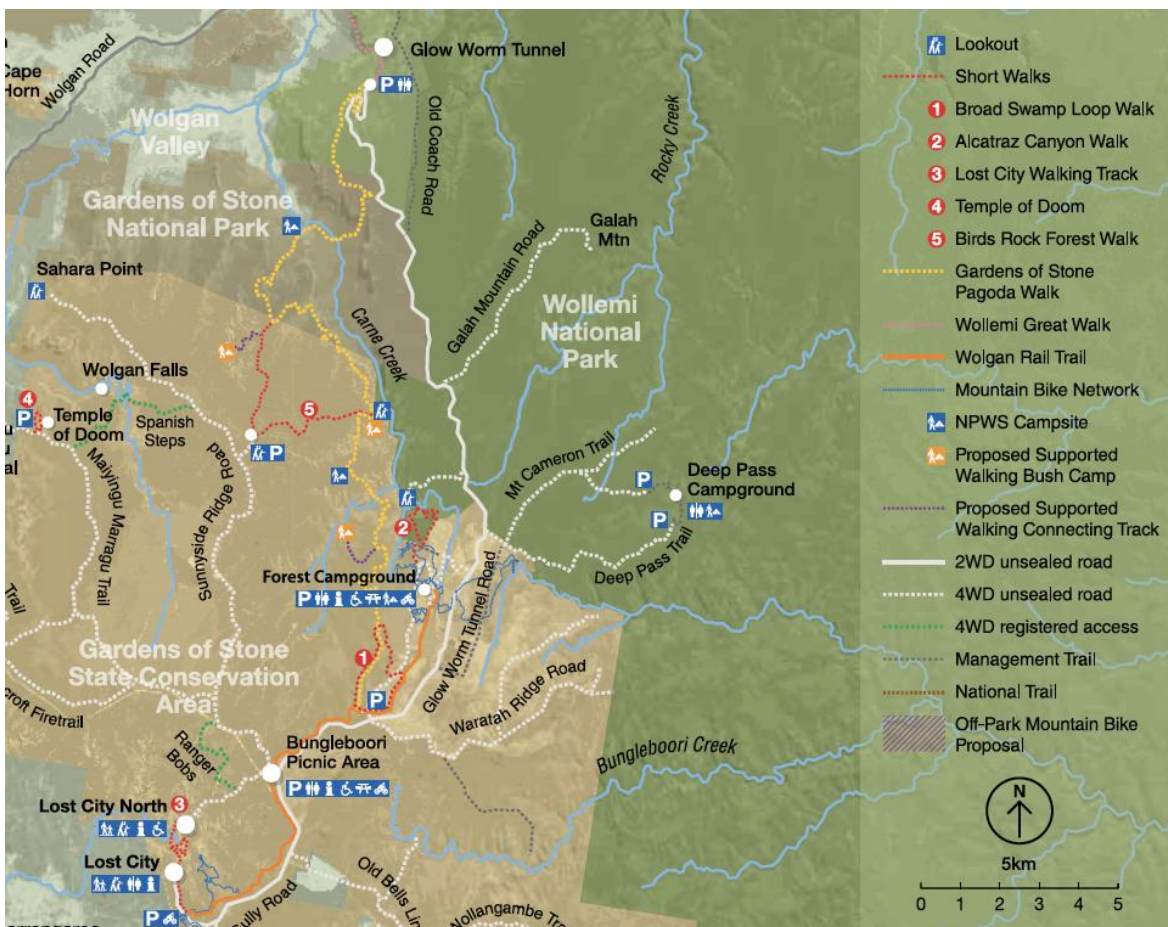


Figure 3: Infrastructure master plan (Source: Visitor infrastructure master plan (DCCEEW 2025 p13))

Assets of intergenerational significance

There are no NPWS Assets of Intergenerational Significance identified in or near the proposed activity area.

Leasing, licensing and easement provisions

Section 151A(5) NPW Act states that the Minister must not grant a lease under section 151 for visitor or tourist uses that authorises the erection of a new building or structure unless:

- there is a Plan of Management in place, and
- the Plan of Management identifies the purpose as permissible and the general location for the new building.

As previously stated, the Plan of Management identifies the location of multi-day walk supported accommodation nodes at locations 1-5 as shown in **Figure 2**, and that the development and operation of visitor accommodation may be authorised on 4 of the 5 identified visitor accommodation nodes. The proposed activity provides for visitor accommodation at 3 of the 5 identified accommodation nodes (being nodes 3, 4 and 5 in **Figure 2**) and is consistent with the requirements of the Plan of Management and section 151A NPW Act.

Internal NPWS projects

The proposal is consistent with the objects of the NPW Act, the management principles of a state conservation area, the functions of the Secretary and the powers and functions of the NPWS which includes the provision of facilities and opportunities for sustainable visitor or tourist use and enjoyment on land.

3.1.2 Wilderness Act 1987 (for activities in wilderness areas)

Not applicable as the study area is not within a declared wilderness area.

3.1.3 Biodiversity Conservation Act 2016

The purpose of the Biodiversity Conservation Act 2016 (BC Act) is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of Ecologically Sustainable Development (ESD) as described in Section 3.1.1 of this REF.

Part 7 of the BC Act requires that the significance of the impact of a proposed development or activity on threatened species, ecological communities, or their habitats, listed under the BC Act be assessed using the Assessment of Significance. Where a significant impact is likely to occur, a Species Impact Statement (SIS) (or Biodiversity Development Assessment Report (BDAR) were NPWS to choose that option) must be prepared.

An Ecological Assessment Report was prepared to inform this REF (Lesryk 2025; Attachment C). Following site surveys, a desktop review and field assessments, 14 threatened fauna species and no threatened flora species listed under the BC Act were recorded or considered highly likely to be present.

Assessments of Significance for the recorded/predicted species concluded that the proposal is unlikely to significantly affect threatened species, or their habitats (Attachment C). As such, the preparation of an SIS or BDAR that further considers the impact of the proposal on these entities is not required.

The proposed activity area does not include any lands that are subject to a biodiversity stewardship site agreement or other management plan under the BC Act.

3.1.4 NSW Reconstruction Authority Act 2022

The primary object of this Act is to promote community resilience to the impact of disasters in New South Wales through:

- a) *disaster prevention, preparedness and adaptation, and*
- b) *recovery and reconstruction following disasters.*

With reference to Section 38(1) of the Act:

- 1) *A relevant entity must have regard to the State disaster mitigation plan and any relevant disaster adaptation plan in exercising any of the relevant entity's functions that are prescribed by the regulations for the purposes of this section.*

The NSW Reconstruction Authority has developed Australia's first *State Disaster Mitigation Plan 2024-2026* (SDMP). The plan sets out the strategy to reduce the impact and cost of natural hazards such as floods, bushfires, storms and cyclones, and coastal erosion and inundation.

Chapter 4 of the SDMP presents actions and desired outcomes for reducing hazard exposure and vulnerability, focusing on broad measures such as evacuation systems, relocation, mitigation infrastructure, planning controls, warning systems, and building standards. These tools are general and not specific to the proposed activity. However, the proposed activity does not conflict with any of them. It is also not connected to disaster prevention, impact, or recovery.

3.1.5 Rural Fires Act 1997

The *Rural Fires Act 1997* aims to prevent and fight bushfires while protecting people, property, assets and the environment in NSW rural areas.

The online SEED Map utilising the NSW Bush Fire Prone Land mapping identifies the Gardens of Stone SCA as Category 1 – high risk vegetation. This vegetation category is considered to be the highest risk for bushfire, and has the highest combustibility and likelihood of forming fully developed fires including heavy ember production.

As a public authority, NPWS is a prescribed fire authority and has statutory obligations to manage and mitigate risks associated with bushfire on land that it manages.

The proposal would not contravene the *Rural Fires Act 1997*, nor would it have an adverse impact on bushfire or bushfire management.

A Fire Management Strategy for the Gardens of Stone SCA is yet to be finalised. NPWS will implement the preparedness guidelines outlined in the Blue Mountains Branch Incident Procedures 2025-26, including public warnings and park closures as required.

The proposed bush camps will be accessible by existing service trails which would allow for public evacuation operations during construction or operation, should they be required. Consistent with the operation of NPWS walk-in campgrounds within Gardens of Stone SCA, there are no asset protection zones to be provided to minimise impacts on the environment. The key priority will be to manage visitor safety and ensure visitors are not present in the park during catastrophic fire danger conditions. Wild Bush Luxury, its patrons and park visitors will be issued a warning in extreme fire conditions, and sections of the reserve may be closed or evacuated at the Branch Director's discretion.

3.2 Environmental Planning and Assessment Act 1979

3.2.1 Assessment pathway

It is confirmed that a REF is the applicable assessment pathway because each of the following apply:

- The proposed activity is not declared to be state significant infrastructure under s 2.13 of the State Environmental Planning Policy (Planning Systems) 2021
- The proposed activity may be undertaken without development consent under the provisions of s 2.73(1)(a) of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP) as it is:
 - on land reserved under the NPW Act or acquired under Part 11 of the NPW Act, **and**
 - for a purpose authorised under the NPW Act.

Under s.5.5(1) of the EP&A Act, NPWS (as the determining authority) is required to *examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity* in order to assess applications for approval of the proposed activity of which they are the determining authority.

This REF complies with the requirement for public authorities to assess the impact of an activity under Part 5 of the EP&A Act.

- The proposed activity is **not** identified as requiring development consent under another environmental planning instrument that prevails over the Transport and Infrastructure SEPP. In particular:
 - The proposed activity is not in a coastal wetland or littoral rainforest, or it does not otherwise meet the criteria for development requiring consent outlined in s.2.7(2) of the State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP)
 - The proposed activity is not coastal protection works or, if coastal protection works, is one of the types of coastal protection works that may be carried out by or on behalf of a public authority without development consent
 - The proposed activity is not a type of development requiring development consent under s.2.9 of the State Environmental Planning Policy (Resources and Energy) 2021.
- The proposed activity is not declared to be exempt development under an environmental planning instrument or fails to fully meet the requirements for exempt development.

3.2.2 Strategic plans

The proposal is on land covered by a local strategic planning statement and regional strategic plan under Division 3.1 of the *Environmental Planning and Assessment Act 1979*. Table 6 provides an assessment of the proposal against these plans.

Table 6. Assessment against strategic plans made under Division 1 of the EP&A Act

Plan name	Relevant planning priorities/objectives	Consistency of proposal
Lithgow 2040 Local Strategic Planning Statement (Lithgow Shire Council 2020)	<p>Infrastructure planning priorities:</p> <p>6. Provide the community with access to attractive, healthy and green public spaces and places.</p> <p>Economic planning priorities:</p> <p>7. Increase the Visitor Economy</p> <p>Environment planning priorities:</p> <p>11. Protect Areas of High Environmental Value and Significance</p> <p>12. Adapt to Natural Hazards and Climate Change</p>	Consistent – provides the community with access to public spaces and supports the visitor economy by providing accommodation to support guided walks. Its location outside areas with environmental or cultural significance minimises impacts.
Central West and Orana Regional Plan 2041 (Department of Planning and Environment 2022)	<p>Sets out the strategic land use planning direction for the region until 2041.</p> <p>The Gardens of Stone SCA is recognised as an emerging adventure tourism location that will bring economic growth opportunities to the Lithgow region through increased tourism activity and investment</p> <p>Relevant Objectives:</p> <p>5. Identify, protect and connect important environmental assets</p> <p>6. Support connected and healthy communities</p> <p>7. Plan for resilient places and communities</p> <p>9. Ensure site selection and design embraces and respects the region’s landscapes, character and cultural heritage</p> <p>22. Support a diverse visitor economy</p>	Consistent – micro-siting of built structures prioritises the use of previously impacted areas to avoid impacts to areas of high environmental and cultural significance. The proposed activity supports healthy and connected communities and provides for a diverse range of visitors, including those who may not have the equipment or experience for self-supported camping and for those who would prefer to experience the walk in a safe and supported environment.

3.3 Other relevant NSW legislation

3.3.1 Coal Mine Subsidence Compensation Act 2017

The proposed activity is not located within a mine subsidence district. This Act does not apply.

3.3.2 Fisheries Management Act 1994

The proposed activity is proposed within 200m of two waterways mapped as Key Fish Habitat, located substantially above the level of the waterways which are in deep gullies (see Section 8.2.3).

The activity does not affect fish, fish habitat, fish passage or marine vegetation and there is no requirement for notification or approvals.

3.3.3 Heritage Act 1977

The *Heritage Act 1977* (Heritage Act) provides protection for items of state heritage significance that are listed on the State Heritage Register (SHR).

No heritage items or places listed on the SHR or the NPWS Historic Heritage Information Management System were identified within the study area. More information is available at Section 8.3.2 and Attachment J.

The proposal does not require approval under s.60 of the Heritage Act, and an excavation permit under s.139 of the Act does not apply.

3.3.4 Marine Estate Management Act 2014

The proposed activity does not adjoin, and will not affect, a marine park or aquatic reserve.

3.4 Commonwealth legislation

3.4.1 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) regulates the assessment and approval of activities that will have, or are likely to have, a significant impact on Matters of National Environmental Significance (MNES), activities by Commonwealth government agencies and activities by any person on Commonwealth land. For proposed actions that have the potential to significantly impact on MNES or the environment of Commonwealth land, a referral is required to the Australian Government.

The EPBC Act applies as the proposed activity is on land that contains the following, or may affect:

- Nationally listed threatened species or listed migratory species.

The proposed activity will not affect any of the following:

- World heritage or national heritage values of a place on the World Heritage List or National Heritage List.
- The ecology of a Ramsar wetland.
- Nationally listed ecological communities.

Assessments relevant to the recorded threatened species were conducted to determine whether the action has, will have, or is likely to have a significant impact on these MNES (see Section 8.5 and Attachment C). The assessments concluded that the proposal would not have a significant impact on the recorded MNES. The proposal is therefore not a controlled action and will not require referral to the Federal Minister for the Environment and Water for further consideration or approval (Lesryk 2025).

3.4.2 Native Title Act 1993

The *Native Title Act 1993* recognises and protects native title, and covers actions affecting native title, and the processes for determining whether native title exists and compensation for actions affecting native title

The proposed activity is within an area of land subject to a registered native title claim under the *Native Title Act 1993*: NC2018/002 – Warrabinga-Wiradjuri #7 Native Title Claim. Determination of this native title claim is pending.

Consultation was undertaken with Warrabinga Wiradjuri Native Title Claimants Aboriginal Corporation in August 2025. No objections or recommendations to the proposal were received, by letter dated 1 September 2025 (see Attachment D).

Refer to Section 5 of this REF for further details.

3.5 Consistency with national parks policy

The proposal is consistent with relevant national parks policy as indicated in **Table 7**.

Table 7. Consistency with national parks policy

Policy name	How proposal is consistent
Due diligence code of practice for the protection of Aboriginal objects in New South Wales (DECCW 2010)	The Aboriginal Cultural Heritage Report has been developed in accordance with the code of practice.
Guidelines for preparing a review of environmental factors (DPE 2022)	This REF is prepared in accordance with the requirements of the guideline.
Parks facilities manual (NPWS 2016a)	The proposed activity is designed and constructed considering the recommendations of the manual. Remote toilets are directly consistent with the manual.
Roads policy	This scope of road works was developed in accordance with the roads policy.
Tree risk management policy	NPWS manages hazardous trees systematically across a wide range of ecosystems in parks. NPWS aims to ensure risks to the safety of park visitors, workers and neighbouring landholders are as low as practicable, keeping in mind the many benefits trees provide people, wildlife and the environment (NSW DCCEE 2021). The proposal is consistent with this policy, with all mature and hollow bearing trees to be retained.
Visitor safety policy	This policy outlines NPWS's legal duty of care towards people in parks and provides guidance about how to address safety issues and reduce risk to park visitors while maintaining park values (NSW DCCEE 2022b). The proposal will be constructed and operated in accordance with this policy.

3.6 Summary of licences and approvals

3.6.1 Approval required from National Parks and Wildlife Service

A lease will be required in accordance with section 151A NPW Act. The proposal to grant a lease was advertised in 2022 and again in 2024 as outlined in Section 10.1.

3.6.2 Other approvals

No approvals (e.g. Part 6 NPW Act, or under the Heritage Act, Fisheries Management Act, Coal Mine Subsidence Compensation Act etc.) apply to the proposed activity.

3.6.3 Publication triggers

The REF must be published following determination if the proposed activity requires an approval or permit identified in section 171(4) of the EP&A Regulations before it may be carried out. These triggers are summarised below in relation to the proposed activity.

Table 8. Triggers for publication of the review of environmental factors

Permit or approval	Applicable?
Fisheries Management Act, sections 144, 200, 205 or 219	No
Heritage Act, section 57(1) (commonly known as a section 60 and not an Exemption under section 57(2))	No
National Parks and Wildlife Act, section 90 (AHIP)	No
<i>Protection of the Environment Operations Act 1997</i> , sections 47–49 or 122	No

In accordance with s.171(4) of the EP&A Act Regulation 2021, as the proposal does not require any of the above permits or approvals, there is no requirement for the REF to be published following determination unless:

- a) *the proposed activity has an estimated development cost of more than \$5 million, or*
- c) *the determining authority considers that it is in the public interest to publish the review.*

While the proposal has an estimated development cost of less than \$5 million, NPWS considers it is in the public interest to publicly exhibit the REF.

4. Consultation – general

4.1 Statutory consultation

4.1.1 Transport and Infrastructure SEPP

The proposed activity does not require any statutory consultation with Council or other agencies. Further details on consultation requirements with relevant authorities is detailed below in Table 9.

Table 9. Consultation triggers under the Transport and Infrastructure State Environmental Planning Policy

Authority (TISEPP section)	Trigger	Applicable to proposal?
Consultation with local council (s 2.10)	Development with impacts on council infrastructure or services (such as stormwater, sewer, water, roads and footpaths)	No
Consultation with local council (s 2.11)	Development with impacts on heritage items listed under the local environmental plan (LEP)	No
Consultation with local council (s 2.12)	Development that will change flood patterns on flood-labile land	No
Consultation with State Emergency Service (s 2.13)	Development on flood-labile land	No
Consultation with local council (s 2.14)	Development that is inconsistent with a certified coastal management program affecting land within the mapped coastal vulnerability area.	No
Consultation with NPWS (s 2.15(2)(a))	Development adjacent to land reserved or acquired under the NPW Act	No
Consultation with NPWS (s 2.15(2)(b))	Development on land in Zone C1 that is yet to be reserved under the NPW Act	No
Consultation with Transport for NSW (s 2.15(2)(c))	Development comprising a fixed or floating structure in or over navigable waters	No
Consultation with the Director of the Siding Spring Observatory (s 2.15(2)(d))	Development that may increase the amount of artificial light in the night sky and that is on land within the mapped dark sky region	No
Consultation with the Cth Department of Defence (s 2.15(2)(e))	Development located within the buffer around the defence communications facility near Morundah as mapped under the Lockhart, Narrandera or Urana LEPs	No
Consultation with the Subsidence Advisory NSW (s 2.15(2)(f))	Development on land in a mine subsidence district.	No
Consultation with the Willandra Lakes Region World Heritage Advisory Committee and Heritage NSW (s 2.15(2)(g))	Development on, or reasonably likely to have an impact on, a part of the Willandra Lakes Region World Heritage Property	No
Consultation with the Western Parkland City Authority (s 2.15(2)(h))	Development within a Western City operational area (Western Parkland City Authority Act 2018, Schedule 2) with a capital investment value of \$30 million or more	No
Consultation with Transport for NSW (s 2.221)	Traffic-generating development listed in Schedule 3	No

4.1.2 Other statutory consultation

Extensive consultation with Lithgow City Council was undertaken as part of the establishment of the Gardens of Stone SCA. This has included the development of the Gardens of Stone SCA Plan of Management and Master Plan, both of which address the

establishment of a major new visitor destination in the greater Blue Mountains and potential for small-scale visitor accommodation on a commercial basis at the proposed locations.

4.2 Community consultation

The Gardens of Stone SCA Plan of Management and Infrastructure Master Plan were finalised following extensive consultation, including the provision of potential opportunities for visitor accommodation and guided tours by commercial operators within the park. The proposed activity and REF have also been informed by feedback from the community following public consultation in relation to the proposed lease to Wild Bush Luxury.

This Review of Environmental Factors will be publicly exhibited, providing further opportunity for community input.

Subject to any future approval of the works, NPWS will prepare visitor alerts to inform park users of temporary road closures during the construction phase. NPWS staff and contractors will also use on site signage to mitigate safety risks during construction, with temporary fencing at public access points. These measures will inform community members about the proposal, delineate the work site, manage access where necessary and support safety of workers and the public.

5. Consultation – Aboriginal communities

5.1 Native title notification requirements

1. Is the land subject to an Indigenous land use agreement (ILUA)? No
2. Has native title been **extinguished**? No or unclear
3. Has there been a determination of native title applicable to the land or is there a native title claim pending? Yes

A Native Title Claim: Warrabinga-Wiradjuri #7 (NC2018/002) filed in 2018 exists over the study area and surrounds. This claim has been accepted for registration. No determination of native title has been made for this application.

4. If native title is not confirmed as extinguished, and the proposal is occurring on land reserved as park on or before 23 December 1996, is it an act in accordance with the purpose of reservation and will it:
 - a. be a 'public work' as per subdivision 24J of the Native Title Act (e.g. a building or other structure that is fixed to the landscape, a road or bridge, a well or a bore, or involves major earthworks, carried out by a public authority)
 - or**
 - b. involve the grant of a lease or easement?

Yes

The proposed works can be validly done in accordance with subdivision 24J of the *Native Title Act 1993* (NTA). For elements of the proposed works that can be characterised as 'public works' under subdivision 24J of the NTA, a native title future acts notification letter is required to be sent to the relevant native title holder or claimant group. In this case, the proposal falls within the NC2018/002 – Warrabinga-Wiradjuri #7 Native Title Claim area.

In August 2025, NPWS issued a native title future acts notification letter in relation to this future act to the Warrabinga Wiradjuri Native Title Claimants Aboriginal Corporation. No objections or recommendations to the proposal were received in their response, letter dated 1 September 2025 (**Attachment D**).

5. If native title is not confirmed as extinguished and the circumstances of Question 4 do not otherwise apply (e.g. the park was reserved after 23 December 1996), is the proposed activity either:
 - a. a facility for service to the public (as defined in subdivision 24K of the Native Title Act)
 - or**
 - b. a low-level activity (as defined in subdivision 24L of the Native Title Act)?

No

NPWS will continue to liaise with Wiradjuri representatives and the native title claimants regarding the proposal. Consistent with the Gardens of Stone SCA plan of management, NPWS will also collaborate with Wiradjuri representatives to implement protocols which help to enhance visitor understanding and appreciation of cultural values.

5.2 Parks under joint management arrangements other than an indigenous land use agreement

The park's management is not subject to another joint management arrangement, such as a memorandum of understanding.

6. Proposed activity (or activities)

6.1 Location of activity

The bush camps are located approximately 15 -19 km north-east of Lithgow within the Gardens of Stone SCA, accessed via State Mine Gully Road. The bush camps are at three locations along the 30 km Gardens of Stone Pagoda Walk, as shown in **Figure 4** and described in **Table 10**. They are within the north-eastern portion of Gardens of Stone SCA in the area generally bounded by the existing network of trails, with access provided via Glowworm Tunnel Road, south of each site. Guided tour operations will occur along the Pagoda Walk.

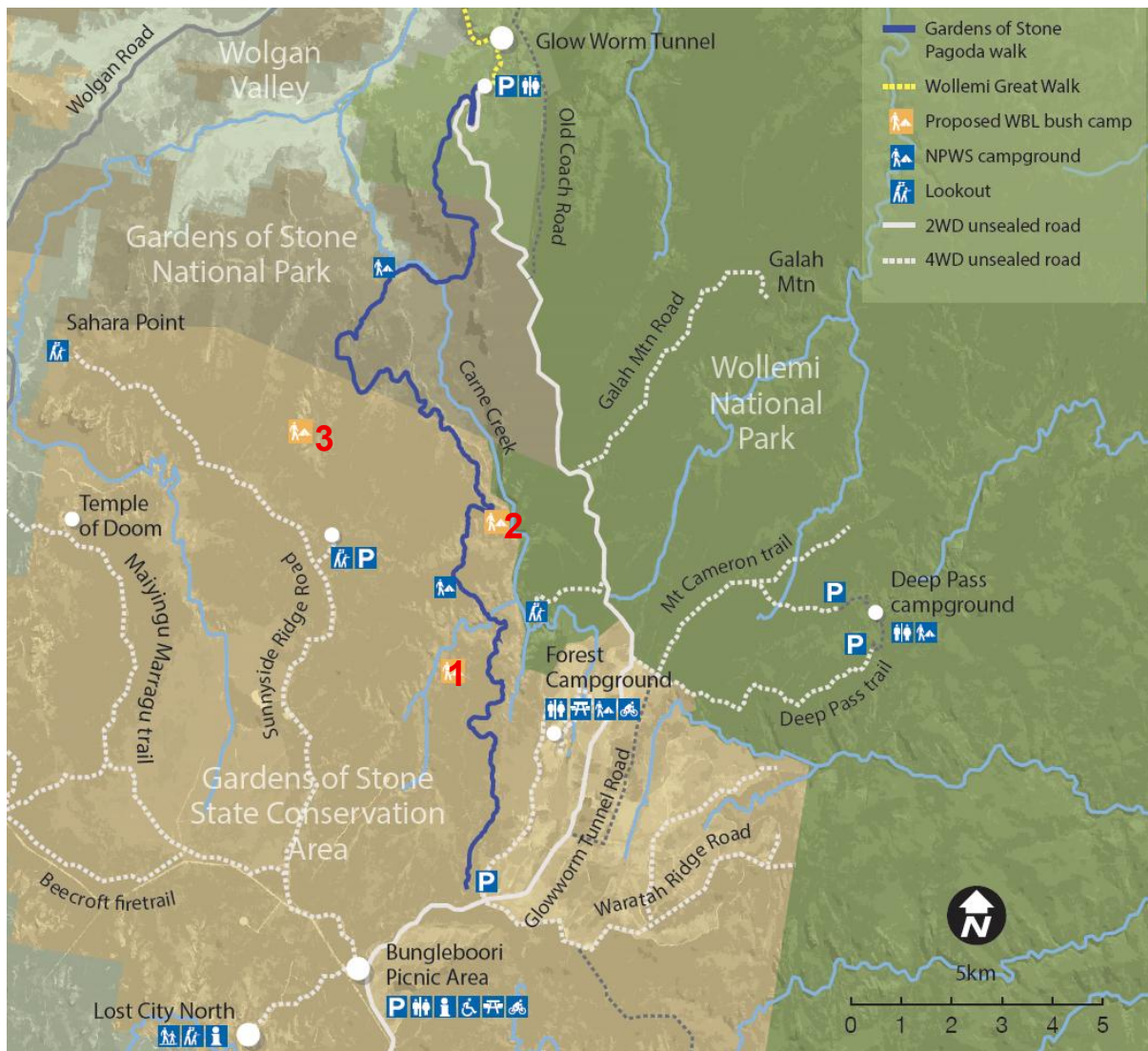


Figure 4: Location of bush camps 1 to 3

Table 10. Summary of activity location

Description of location	Three bush camps and associated facilities located within the Gardens of Stone SCA, approximately 15 - 19 km north-east of Lithgow, accessed via State Mine Gully Road and Glowworm Tunnel Road. Guided tour operations are proposed on the Pagoda Walk (see Figure 4).
Park name	Gardens of Stone SCA
Other tenures	N/A
Lot/DP	N/A
Site reference	<p>Bush Camp 1 (Plan of Management Node #5) - Night 1 -33.350928, 150.216225</p> <p>Bush Camp 2 (Plan of Management Node #4) – Night 2 -33.325883, 150.226589</p> <p>Bush Camp 3 (Plan of Management Node #3) – Night 3 -33.308794, 150.185194</p>

Approximate site locations were identified in the Gardens of Stone SCA plan of management, which was adopted in November 2022 following public consultation. Further detail on site locations following detailed assessments and site analysis was included in the notice of intent to grant a lease to Wild Bush Luxury, published in 2024.

The total footprint for site structures for the three bush camps, including connecting timber boardwalks, covers 1,935m² in area, in addition to 3,780m² for road access upgrades.

The locations for the bush camps and supporting infrastructure include disturbed environments, heathland, rock outcrops and sclerophyll forest. More detail is provided in Section 8.

6.1.1 Bush camp 1

Bush camp 1 is located approximately 4.5km north of the start of the Pagoda Walk at the northern end of North Ridge Trail, and is located 2.25km east of Sunnyside Ridge Road and 3.4km south-east of Birds Rock. From the Pagoda Walk it is accessed via an existing connecting track and road, approximately 1.5km from the Pagoda Walk. Upgrade works to the existing access road also forms part of the proposed activity (see **Figure 5** and **Figure 6**).

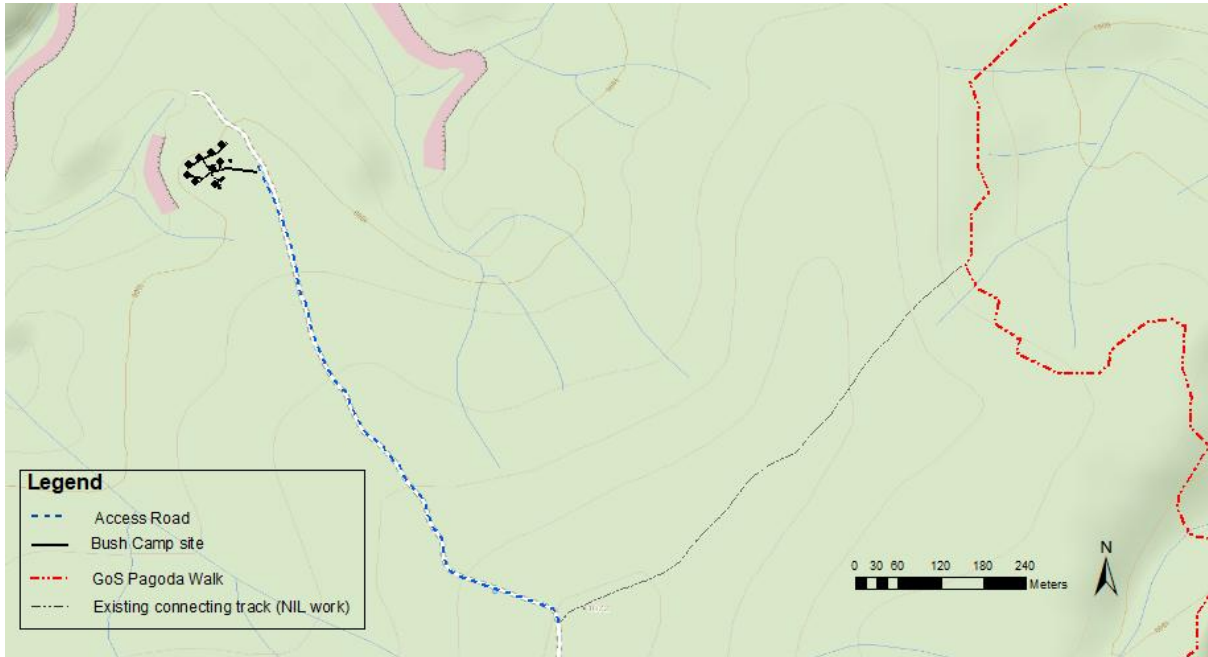


Figure 5: Bush Camp 1 Connecting Road



Figure 6: Bush Camp 1 Site (Aerial: source Phillip Sage 2025)

6.1.2 Bush camp 2

Bush Camp 2 is located approximately 14km from commencement of the walk, 290 metres south of the existing Birds Rock Trail and 394 metres southwest of Carne View lookout. It is located approximately 190m along an existing access road from the Pagoda Walk. Upgrade works to the existing access road also forms part of the proposed activity (see **Figure 7** and **Figure 8**). The bush camp is set among pagoda landscapes overlooking Carne Creek. The bush camp is located away from pagoda rock outcrops. No works are proposed on pagoda formations.

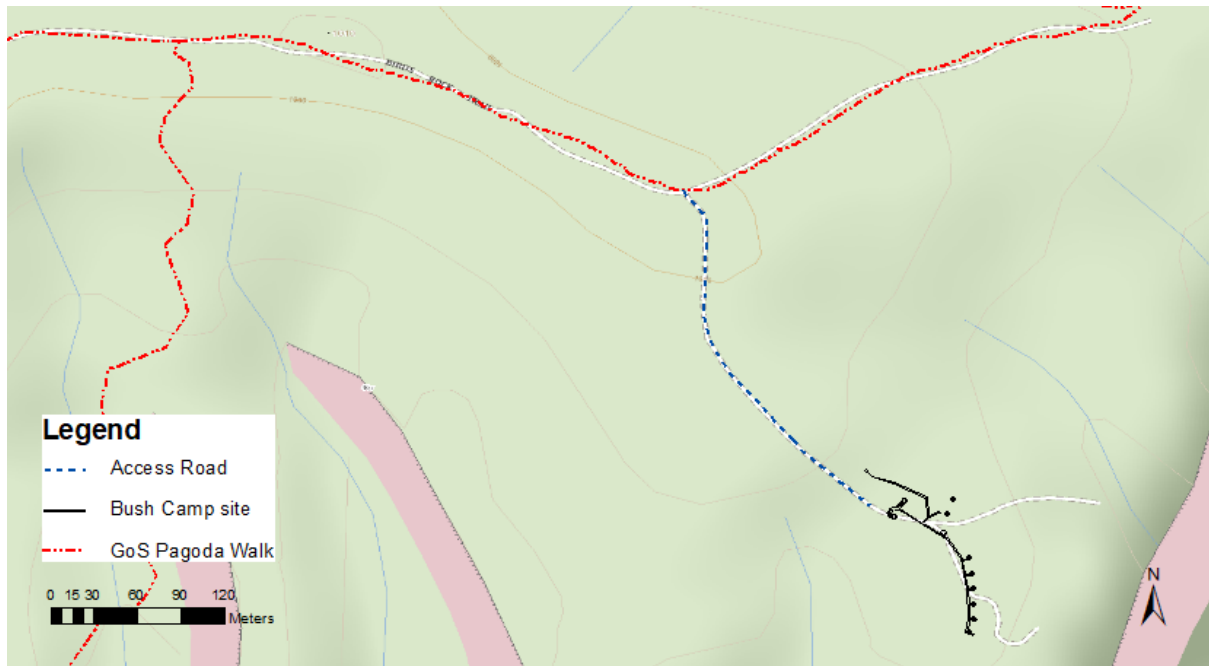


Figure 7: Bush Camp 2 Connecting Road



Figure 8: Bush Camp 2 Site (Aerial source: Phillip Sage 2025)

6.1.3 Bush camp 3

The access to bush camp 3 is located approximately 20km from commencement of the walk. It is approximately 1500m south-west of access to the Pagoda Walk and 100m southwest of the end of an existing vehicle access track (see **Figure 9** and **Figure 10**). This access track commences from Birds Rock Trail No 1, an existing gated NPWS management trail which will be used to access the camp. While access is available via the existing management trail, an additional walking track is being considered to improve connectivity to the Pagoda Walk as identified in **Figure 9**. This would be subject to separate environmental assessment following detailed site scoping and analysis.

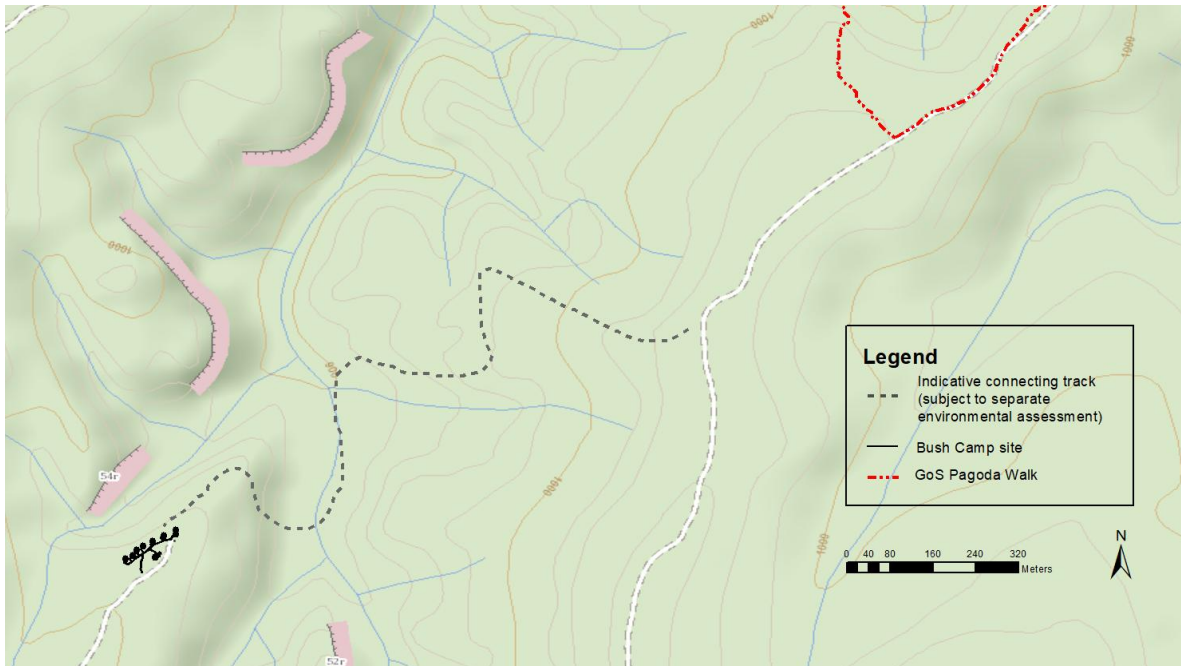


Figure 9: Bush Camp 3 Indicative track alignment

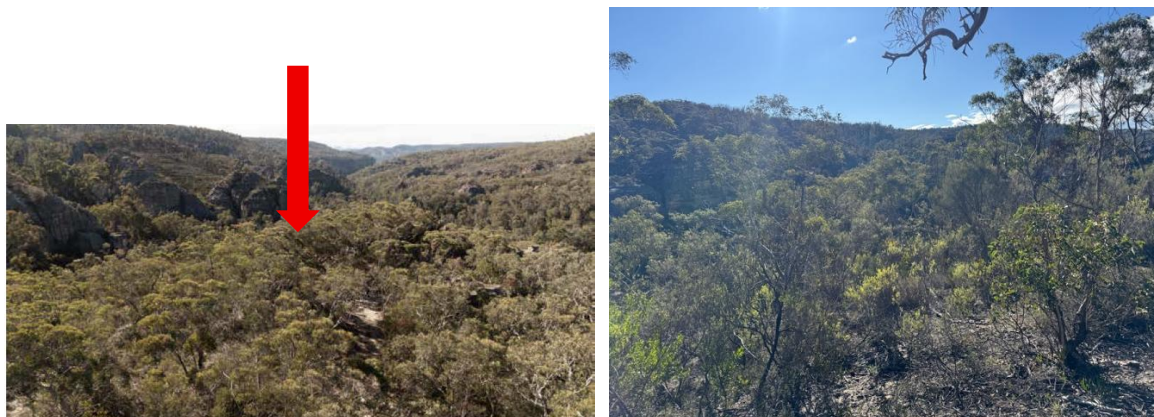


Figure 10: Bush Camp 3 Site (Aerial source: Phillip Sage 2025)

6.2 Description of the proposed activity

The proposed activity allows for supported, guided walking and serviced bush camp accommodation and associated infrastructure by an independent tour operator for a 4-day, 3-night supported walking experience on the Gardens of Stone Pagoda Walk.

The proposed activity includes the construction of three low impact high-quality bush camps for 10 walkers and two guides, improvements to access roads for bush camps 1 and 2, and ongoing operations for up to 20 years consistent with the proposed terms of a future lease. The proposed initial lease term is 10 years plus two 5-year options (total potential term of 20 years).

This guided walking experience will complement the publicly accessible Gardens of Stone Pagoda Walk. It will encourage diversified visitation and establish bespoke guided walking experiences without compromising public use or impacting protected areas.

The three bush camp areas each include:

- six 2-person enclosed 4m x 3m cabins, with a footprint of 22.8m per cabin (including entry deck)
- one communal covered common area, with a footprint of 4m x 16.3m (including deck) and adjacent 10,000 L rainwater tank
- one amenities facility containing 2 showers and 2 toilets and adjacent 2 x 10,000 L rainwater tanks, with a footprint of 2m x 4.4m for toilets and 2.3m x 4.4m for showers and outdoor covered area
- construction of timber or fire-retardant plywood (FRP) boardwalks connecting the cabins, communal common area and amenities facility
- all systems and facilities required for a quiet, 'light-touch', self-sufficient camp, including rainwater tank, solar photovoltaic (PV) electricity supply, and grey-water treatment
- grey-water treatment includes a 56m² soil mound, a septic tank and pump well, with an approximate footprint of 60m² at each site
- sealed pod toilets, which will be removed off-site for disposal, ensuring no toilet waste enters the treatment system.

The key parameters of the proposed activity initially identified in the notice of intent to lease (**Attachment I**) have been refined. A comparison to the parameters proposed in the notice of intent to lease with the final proposed parameters for the proposed activity is provided at **Table 11**.

Table 11. Comparison to parameters known at the time of 2024 notice of intent to lease (per bush camp site)

Category	Notice of Intent to Lease Description	REF Activity Proposal
Structures (excluding boardwalks)	Footprint will not exceed 300m ²	Consistent
Cabins	Six two-person sleeping cabins (including entry deck) 15m ² each (3m x 5m)	Consistent 136.8m ² total at each site (6x 22.8m ² cabins including entry deck)

Category	Notice of Intent to Lease Description	REF Activity Proposal
Communal building	60m ² covered area (5m x 12m)	65.2m ² covered area
Amenities Facility	3 showers	2 showers (2.3m x 4.4m)
	3 composting toilets	2 toilets (2m x 4.4m) Composting not proposed – see below
Rainwater tank	20,000L tank water supply	3 x 10,000L water tanks 17.1m ² (5.7m ² x 3)
Boardwalks	Timber or fire-retardant plywood (FRP) boardwalks	Consistent
Power	Solar photovoltaic (PV) electricity supply	Consistent
Effluent treatment	Greywater treatment	Provided – see Section 6.2.3 (60m ² including soil mound, septic tank and pump well)
	Black water treatment	Fly-in fly-out pods proposed for improved environmental outcomes

The layout of each bush camp is shown at **Figure 11** and at **Attachment A**.

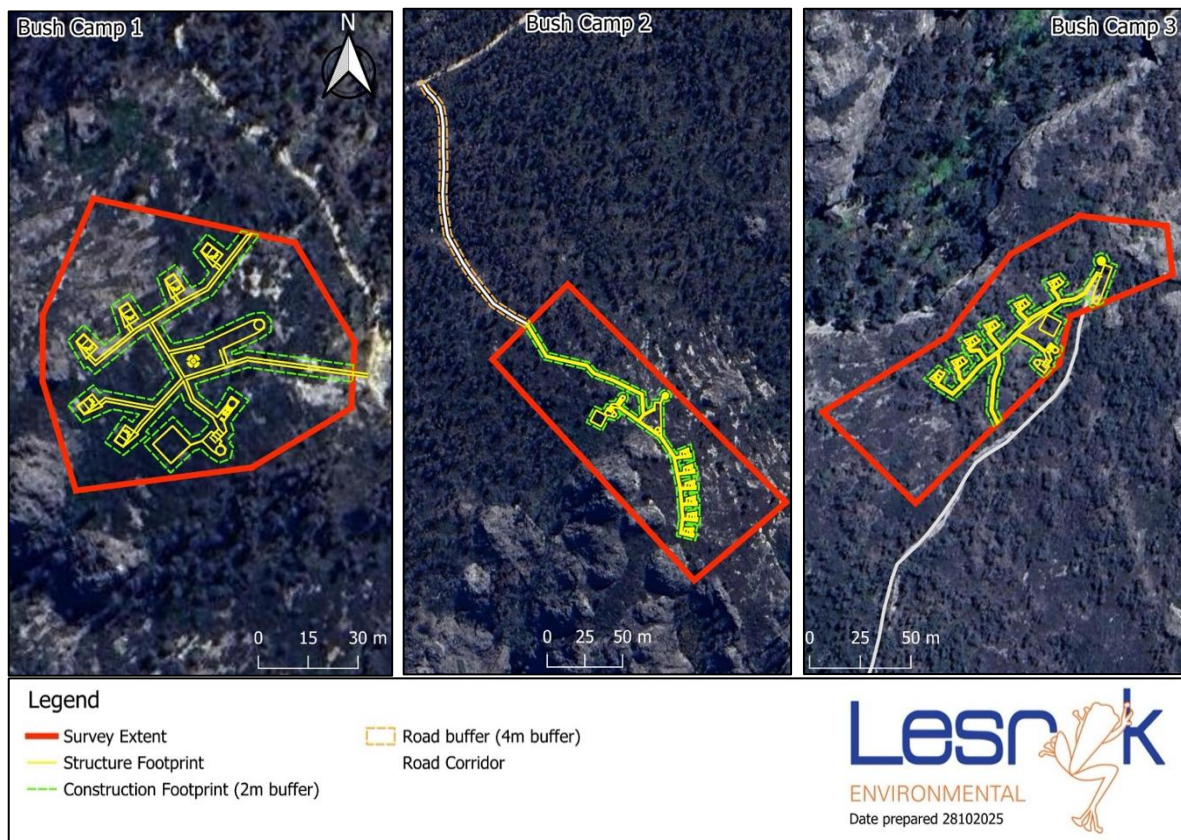


Figure 11: Layout of bush camps

The total footprint of buildings and structures including connecting timber boardwalks, Ecomax and tanks is:

- Bush camp 1 – 640m²
- Bush camp 2 – 725m²
- Bush camp 3 – 570m².

6.2.1 Siting

The Gardens of Stone SCA Plan of Management identified five approximate locations for potential accommodation nodes. These locations were determined following consideration of the following siting principles:

- existing 4WD access (to minimise potential impacts and so that infrastructure and servicing are feasible)
- absence of significant cultural or environmental constraints
- terrain gradient and profile favourable for development
- potential for scenic amenity/good views including of rock pagodas.

More detail on site suitability is provided in Section 7.4 and **Attachment E**.

These five approximate locations identified in the Plan of Management were further refined following detailed site assessments and feasibility analysis, and three sites were prioritised to provide connectivity with the Gardens of Stone Pagoda Walk. Following an Expression of Interest process, NPWS published a notice of intent to grant a lease to Wild Bush Luxury in May 2024, including detail on the proposed development, lease and site locations which are detailed in this proposal.

This proposal aligns with the Gardens of Stone SCA Plan of Management and notice of intent to grant a lease. Both documents were released for public feedback in May 2022 and May 2024 respectively.

Located within the boundaries identified in the notice of intent to lease (**Attachment I**), the design approach prioritises protection of natural features, existing vegetation, and topographic character. Siting decisions have considered prevailing weather patterns and view capture opportunities. The design also considers the walker's approach and arrival experience at each location.

Each campsite contains a maximum of 300m² of built structures, excluding connecting boardwalks, to minimise site disturbance and visual impact.

6.2.2 Built Form Specification

All built structures are intended to be pre-fabricated off-site to minimise on-site impacts.

Cabins

The cabins each have an internal area of 12m², and with external decks have a total footprint of 22.8m² (see **Figure 12**). Each cabin comprises modular elements — timber walls with a canvas wrap around the exterior and roof, a fixed view window, screened vents, and a deck shaded by the extended roof.

Cabin heights average 2.6 to 3.0 metres, with a maximum height of 3.5 metres above grade.

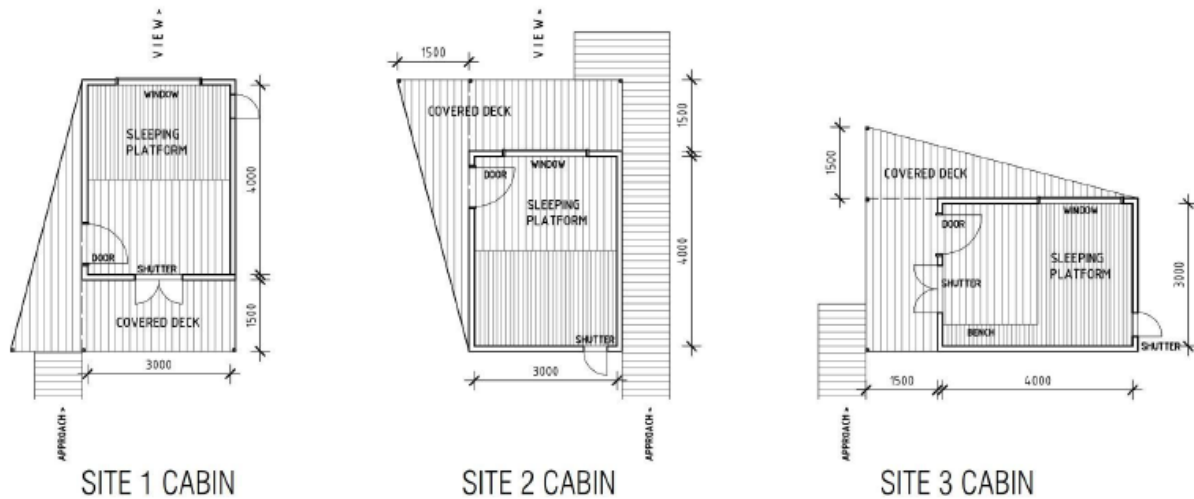


Figure 12: Cabin layout

Cabins and built structures will be consistent with built forms which are currently in place at other Wild Bush Luxury locations, including Maria Island, with the use of designs and materials which support integration to the natural environment (**Figure 13**).



Figure 13: Cabins at existing Wild Bush Luxury locations (Source: Wild Bush Luxury)

Communal building

The communal buildings have an internal area of 41.2m² and a 24m² covered outdoor deck (see **Figure 14**).

Each communal building has cooking and washing facilities and is organised around a large central table. Outdoor shaded tables and a covered fire pit area extend communal space into the surrounding landscape.

Communal buildings are kept to a maximum height of 3.3 metres with a 3-degree roof pitch to reduce visual bulk. Colorbond Gully corrugated metal roofing will be used on communal buildings for water capture.

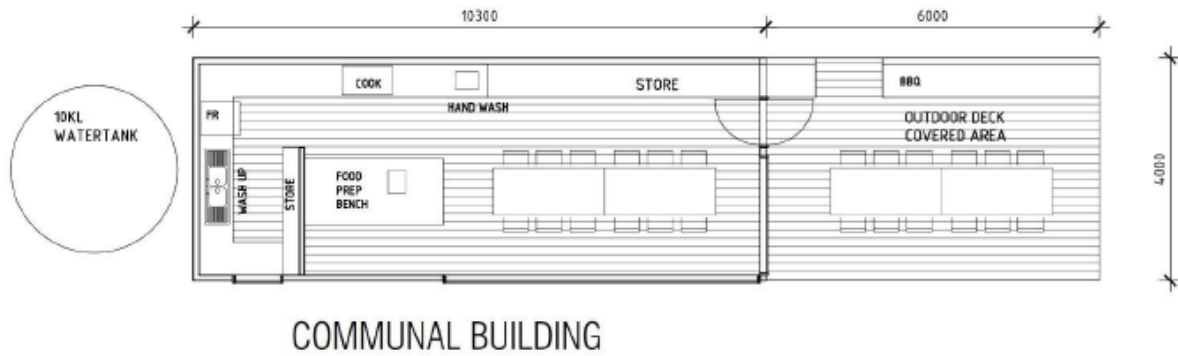


Figure 14: Communal building

Boardwalks

Structures are connected via timber boardwalks to minimise ground disturbance and protect native vegetation and soil. Boardwalks are intended to be 450mm wide, varying in length at each site.

Amenities

Amenity structures follow the NPWS remote area toilet design, with two separate remote toilets and two modified structures combined to incorporate two showers. Colorbond Gully corrugated metal roofing will be used on amenities buildings for water capture.

The remote toilets are designed to reduce environmental impacts. They are light weight, easy to install and maintain, and can be packaged in kit form for assembly onsite. Each unit is raised 900mm off the ground to accommodate sealed toilet waste containers below, with a maximum height of 2,700mm. This approach eliminates the need for underground infrastructure and minimises ground contamination.

The receiving tanks/pods can be swapped over and stored for later removal and can be serviced by helicopter. Servicing by helicopter rather than vehicle access will minimise the need for additional road servicing and vegetation clearing. Helicopter servicing of amenities is discussed in more detail under Waste Management (below).

Material Selection and Appearance

All proposed structures incorporate a consistent material designed to minimise environmental impacts. The palette comprises natural hardwood timber, canvas, and Colorbond corrugated metal roofing.

The proposed cabins, communal building and amenities block will be constructed from natural hardwood timber walls which will be left untreated to weather to a grey finish.

The roof of the cabins will be canvas, and a canvas wrap around the walls is designed to reduce visual impact and provide additional weather protection. Colorbond Gully corrugated metal roofing will be used on the communal and amenities buildings for water capture.

Canvas awnings will extend from communal building roofs to provide shaded outdoor gathering spaces.

The colour scheme will blend in with the surrounding landscape, with colours and materials selected for low reflectivity, integration with natural earthy tones and high durability. All fixed windows will use low-reflectivity glass to reduce glare and light pollution. No stainless steel or highly reflective materials are incorporated into external surfaces.

Footings

Minimal footings will be used for built structures, with all structures to be fully removable upon decommissioning.

Where rock is close to the surface, boardwalks and cabins will be secured using 12 mm chemset anchors drilled directly into the rock. A dry-pack structural grout leveling strip will be applied to provide a stable base while avoiding any excavation into surrounding soil or vegetation (see **Figure 15**).

In areas where rock is deeper (approximately 300–500 mm below the surface), small pad footings may be required. These will be installed using minimal on-site concrete, prepared from pre-packaged bulk bags and hand-mixed to reduce the need for heavy machinery. Depending on site conditions, additional rock tie-downs may be incorporated as recommended by the structural engineer.

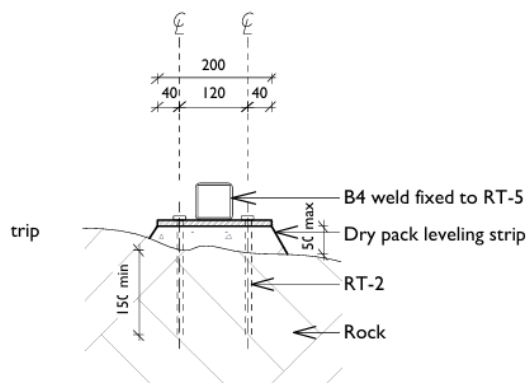


Figure 15: Typical footing detail for rock

This approach ensures that ground disturbance is limited, vegetation removal is avoided wherever possible, and impacts on drainage, root systems and surrounding flora are negligible.

6.2.3 Infrastructure and Services

Water Supply and Wastewater Management

Each site contains minimal water fixtures: two toilets, two showers, and one hand basin within the amenity building, plus one communal dishwashing sink. Black water (sewage) is managed through the NPWS fly-in/fly-out sealed container system, with containers positioned beneath elevated toilet structures and extracted by helicopter for off-site processing. This approach eliminates on-ground treatment infrastructure and prevents soil or groundwater contamination.

Greywater from showers, basins, and dishwashing is treated through a multi-stage system consisting of a baffled septic tank (2800L to 3200L capacity), biotube effluent filter within the septic tank to retain solids and improve effluent quality, and Ecomax amended soil mound system before controlled dispersal. Only biodegradable, low-impact personal care and cleaning products are permitted for use to protect system integrity. Each camp will also have a 1000L capacity pump-well between the septic tank and Ecomax mound.

Construction of the Ecomax soil mound will include removal of vegetation in preparation for mound construction, with no excavation or cut into the natural soil profile. The mound will include:

- a 200mm thick bed of clean sand fill
- an impervious membrane below the base of the Ecomax cell
- a 300mm wide clay bund around the perimeter extending 300-400mm beyond the cell
- a leach drain in the centre of the Ecomax cell
- a capping of topsoil and clean sand fill over the amended soil mound
- grass cover over the system (see **Figure 16**).

Each Ecomax system will be 7.8m in length x 7.2m in width, with a total area of 56.16m². The cell will allow for wastewater treatment of 200L/day. The footprint to accommodate the Ecomax system, septic tank and pump well will be approximately 60m² at each site.

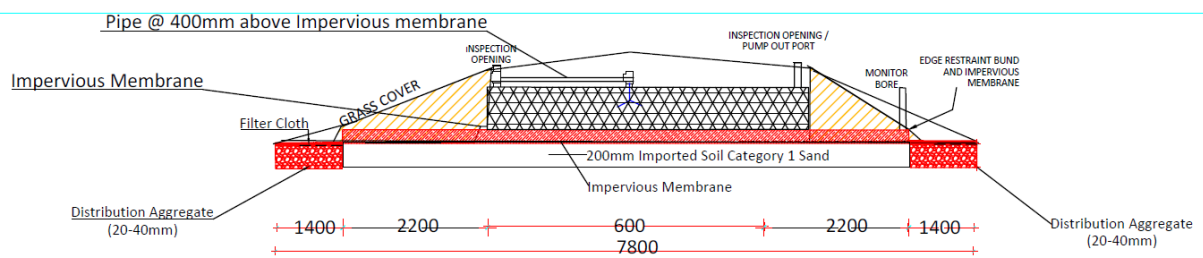


Figure 16: Ecomax Amended Soil Mound Design

More detail on the effluent management systems for the bush camps is provided at **Attachment G**.

Energy Supply

All three sites operate entirely off-grid with no mains electricity connection. Power is generated exclusively through solar photovoltaic panels with battery storage providing power during low-solar periods. Electrical demand is restricted to essential services: LED lighting, refrigeration, water pumping, and wastewater treatment operation. No mechanical cooling or space heating is provided in sleeping cabins. Bottled gas is used selectively for hot water heating, cooking, and communal space heating only.

6.2.4 Access road improvements

Access roads to bush camp 1 and bush camp 2 require upgrades to support construction and future maintenance activities. Road repairs will permit the use of light vehicles and All Terrain Vehicles (ATVs) for ongoing access and maintenance. A 4m wide access road is required which includes a 2.4m road carriageway and buffer zones for vegetation maintenance.

The access road to bush camp 1 is 750m long and is on bedrock in an erosion gully, requiring remediation. Imported fill material will be used to repair the road surface and construct drainage structures. No vegetation clearing will be required.

The access road to bush camp 2 is an existing 195m long road corridor which has become heavily revegetated. Targeted vegetation clearing and installation of drainage structures will be required.

6.2.5 Operational Management

Operational Management Plan

An Operational Management Plan (OMP) will be prepared to establish clear procedures for the ongoing operation, maintenance and management of the proposed activity. The OMP will address procedures and protocols for site, staff and contractor management, in accordance with conditions and mitigations outlined in Section 9 of this REF. The OMP will provide a practical framework for the ongoing and responsible operation of the proposed activity, including but not limited to:

- Bushfire management
- Visitor numbers
- Access requirements
- Visitor access and protection of pagodas
- Hours of operation and staffing arrangements
- Emergency management and response
- Waste management and removal
- Site access, traffic and parking management
- Maintenance schedules and operational responsibilities
- Noise, light and odour control measures
- Visitor management
- Weed management
- Site management during shutdown periods

The Operational Management Plan will be reviewed in consultation with NPWS as required to ensure adequate controls are in place to appropriately manage, operate and maintain the proposed activity.

Hours of use

Usage will be seasonal over about 6 - 8 months/year with approximately 4 - 6 months/year having nil usage.

Guests will typically arrive at camp from approximately 4:00 pm and depart by 8:30 am; times that are generally outside peak park use.

Visitor numbers

The bush camp facilities will be utilised periodically for guests and guides on walking trips, or tours. At a given bush camp, there will be a maximum of 10 walkers and 2 guides per tour, totalling up to 12 persons in a single day. Usage will be seasonal over about 6 - 8 months per year with approximately 4 - 6 months per year having nil usage.

Initial estimates after establishment are for approximately 400 persons (including guides) per year evolving over time to an estimated future maximum of 1000 persons per year as visitor awareness develops. It is anticipated to be approximately 83 - 85 separate days of usage in a given season. This is based on usage of up to 3 - 4 days per week during a walking season, with people arriving at about 4pm on a given day and departing the following morning at about 8.30am.

Visitor interpretation

Visitor interpretation will include site signage and cultural awareness components developed in collaboration with Traditional Owners. This may encompass storytelling, explanation of

significant sites, seasonal or ecological knowledge, and the cultural context of the Newnes Plateau.

Interpretive materials and discussions will be designed to be informative, respectful, and non-intrusive, complementing the natural experience of the walk. Where possible, Traditional Owner voices will be incorporated to the visitor experience through guided interpretation, multimedia content, or curated on-site information.

Staffing

It is anticipated there will be two full time operations staff and up to 30 casual staff, including drivers and guides within the first five years of operation. New employment opportunities will be established, with priority given to local residents to enhance community outcomes. Traditional Owners will also be prioritised for potential employment opportunities encompassing guiding and cultural awareness training.

Waste management

On-site staff will be responsible for system monitoring and maintenance, ensuring ongoing performance of water and wastewater systems, energy generation, and waste management protocols. An Operational Management Plan will be developed and implemented to address water conservation practices, biodegradable products use, waste separation and removal procedures. Rubbish and recycling will be stored in rodent-proof, sealed steel boxes during the operating season and removed approximately every two months via All Terrain Vehicle (ATV) or light vehicle.

Management and maintenance of the effluent systems together with details of the system's location and operations, consistent with the recommendations associated with the design, management and maintenance of the effluent systems contained with **Attachment G**, will also be addressed in the Operational Management Plan.

Toilet waste will be removed via fly-in fly-out toilets. This approach is consistent with Appendix C of the *Sustainability Assessment Criteria for visitor use and tourism in New South Wales national parks*, which states preference is given to systems that are proven to be fit for the intended purpose with least risk to the environment.

Remote toilets will utilise NPWS Park Facilities manual design to provide a consistent approach to toilet waste management across the Gardens of Stone SCA. Remote toilets are currently in place at Deep Pass campground and will be utilised at both NPWS campgrounds on the Gardens of Stone Pagoda Walk, with Wild Bush Luxury to engage NPWS for container removal as part of standard NPWS park operations for the Gardens of Stone Pagoda Walk.

According to anticipated visitor numbers at the Wild Bush Luxury bush camps and nearby public campgrounds, it is expected that helicopter operations will be required every 8-12 months. Fully contained bins will be airlifted to a dedicated waste removal truck within the Gardens of Stone SCA, for removal to a suitable facility. Helicopter operations will be coordinated across all sites to streamline park operations and associated costs, and minimise potential environmental impacts.

Cultural partnership

Cultural partnerships will be prioritised through the development of a structured program, developed in collaboration with Traditional custodians. Initiatives may include the engagement of cultural staff for guiding opportunities, cultural awareness training and potential business partnerships. Formal partnerships with Traditional Owner groups are planned to deliver cultural education experiences and support sustainable employment pathways.

Weed management

The Operational Management Plan will address biosecurity, weed hygiene procedures, monitoring and weed control.

Weed introduction and spread will be carefully managed through strict hygiene protocols, including the use of boot cleaning stations, designated access routes and visitor education about weed hygiene practices. All camp construction materials, equipment, and supplies will be sourced from reputable suppliers and inspected prior to transport to site to ensure they are free of soil, seeds, and vegetative material. A weed maintenance activity register will be established to support ongoing monitoring in collaboration with NPWS.

Bushfire management

Asset Protection Zones are not proposed to minimise potential environmental impacts and bush camp sites will be considered non-defendable in the event of a major bushfire. Visitor safety will remain a key priority, with public warnings and park closures to be implemented in line with the preparedness guidelines outlined in the Blue Mountains Branch Incident Procedures 2025-26 as required.

Water provision and use

Bush camp operations will rely on collected rainwater. Assumptions are based on a daily allowance of 100 litres for showers, cooking and washing, and a further 100 litres per day for drinking water (8 litres per person per day). These estimates align with an average monthly rainfall of 60 mm, a rainwater tank capacity of 30,000 L at each site, and a total roof catchment area of 80 m².

Protection of pagodas

Protection of pagoda formations remains a key priority during development and as part of ongoing operations at each site. All guests will receive a pre-walk briefing by expert field guides regarding best practice walking and pagoda preservation. No access will be permitted on pagodas at any time. The use of elevated boardwalks will enhance protection of pagodas and vegetation by ensuring guest access is restricted to designated areas.

6.2.6 Site Rehabilitation/Decommissioning

The proposed lease term is 10 years plus two five-year options, being a total potential term of 20 years. Prior to the expiration of the second five-year option, NPWS will determine the next steps for the site based on policies and legislation in place at that time. In the event that cessation of supported accommodation on the Gardens of Stone Pagoda Walk is recommended, decommissioning of site structures will be required.

All footings have been designed to be fully removed upon decommissioning.

If decommissioning of site structures is required, the lessee will complete remediation measures to mitigate and/or manage impacts on soil erosion, unplanned trampling, nutrient level changes, weed management and visual impacts. All remediation works will be completed with input from NPWS in accordance with environmental requirements and provisions outlined in the NPW Act.

6.2.7 The proposed activity: pre-construction, construction, operation and rehabilitation/decommissioning

Pre-construction

1. Prepare a Construction Environmental Management Plan (CEMP) and Erosion and Sediment Control Plan (ESCP) for the proposed activity and implement required measures.
2. Prepare a site construction plan which identifies stages of work, locations for waste storage and appropriate temporary and signage requirements for each camp site.
3. Communicate any site closures at least 2 weeks prior to commencement of work via the NPWS website and temporary signage.
4. All relevant personnel to complete a site induction that outlines the requirements of the CEMP and legislative requirements, with tool box talks to brief personnel on specific environmental issues (e.g., conservation, threats, risk) and of site sensitivities (i.e., historic or Aboriginal heritage).

Site establishment

5. NPWS to complete site survey to confirm the extent of lessee's area of operations.
6. Mark out footprints for cabins, communal buildings, and associated facilities.
7. Installation of temporary erosion and sediment controls identified within the ESCP; to be monitored and maintained for the duration of the works period (particularly after periods of heavy rainfall).
8. Installation and maintenance of environmental mitigation measures identified in the CEMP and this REF.
9. Vegetation removal to establish site compound/helipad unloading site at the three camp sites, within the footprint of the proposed communal building. Mature and hollow-bearing trees to be retained.
10. Prefabricated sections or modules of campground structures will be transported to each site using light vehicles along existing park tracks or helicopter where access by road is impractical.
11. Delivery of materials and prefabricated built structures to site by helicopter, including appropriate road closures and visitor messaging on the NPWS website.

Construction

12. Removal of debris and rocks to improve access road safety.
13. Carry out access road improvements including installation of drainage features.
14. Bush camps will be predominantly prefabricated offsite to minimise onsite disturbance and reduce the footprint of construction activities.
15. Undertake precautionary assessments for Aboriginal artefacts and install footings for structures in accordance with structural engineering requirements.
16. Minimal cut and fill will be used to level platforms, with all disturbed areas stabilised immediately using brush matting, jute mesh, or natural regeneration techniques.
17. Assemble prefabricated cabins, boardwalks and associated infrastructure.
18. Install greywater system including greywater treatment mound, septic tank and pump well.
19. Monitor weed invasion and spread of soil, plant and animal pathogens.
20. Mature and hollow-bearing trees not to be removed.

Post-Construction

21. All waste materials, including packaging, will be removed from site and disposed of at licensed facilities.
22. All temporary stockpile and laydown areas will be rehabilitated as required.
23. Disturbed areas will be monitored for erosion and weed colonisation, and corrective actions implemented as required.
24. Prepare an Operational Management Plan for NPWS approval, addressing ongoing use and maintenance of the sites. Key considerations include visitor management and safety, waste removal (including toilet waste removal and greywater management requirements), environmental management including protection of pagodas, weed management, visitor educational opportunities, energy and water minimisation and seasonal shut-downs.

Operation

25. Implement the Operational Management Plan.
26. Sites will be accessed via All Terrain Vehicle (ATV) or light 4WD vehicle as necessary.
27. During the start of season dry goods and equipment will be stocked within fully contained bush camps via ATV or light vehicle.
28. During the operating season, rubbish and recycling will be removed approximately every 20 trips or bi-monthly.
29. At the end of the season goods and equipment will be removed to shut down bush camps for the off-season.

Rehabilitation/Decommissioning

30. If decommissioning of structures is required, complete site remediation will be required to mitigate and manage environmental impacts.
31. All remediation works will be completed with input from NPWS in accordance with environmental requirements and provisions outlined in the NPW Act.

6.2.8 The proposed activity footprint (size of the area of impact)

A total disturbance footprint of approximately 9,620m² (0.96 ha) has been identified to facilitate the proposed activity (Table 12). This footprint includes all site structures, in addition to a 2-metre buffer to allow for access and equipment during construction (construction footprint), and upgrades to existing access roads to bush camp 1 and 2.

It is noted that the disturbance footprint is likely to be significantly less, as vegetation removal is not required on the existing access trail to bush camp 1.

Site structures, excluding connecting timber boardwalks, are no greater than 300m² at each site. As previously stated, this is consistent with the notice of intent to lease.

Table 12. Structure and Construction Footprints

Category	Site Description	Area (m ²)
Structure Footprints (includes boardwalks, Ecomax, and rainwater tanks)		
	Bush Camp 1	640
	Bush Camp 2	725
	Bush Camp 3	570
	Total Structure Footprint	1,935
Construction Footprints (including structure footprints and 2m buffer except where it exceeds site boundary)		

Category	Site Description	Area (m ²)
	Bush Camp 1	1,835
	Bush Camp 2	2,130
	Bush Camp 3	1,875
	Total Construction Footprint	5,840
Access Roads		
	Existing Access Road (1) – 750m long, 4m wide	3,000
	Existing Access Road (2) – 195m long, 4m wide	780
	Total Access Roads	3,780
TOTAL COMBINED CONSTRUCTION FOOTPRINT		9,620

Stockpile sites during construction will be designated within the construction footprint area and on existing access roads if required.

6.2.9 Proposed construction methods, materials and equipment

The proposed bush camps will be constructed using a modular, low-impact methodology that prioritises minimal ground disturbance and environmental protection. Construction methods have been developed in consultation with a structural engineer and sustainability advisors to align with NPWS standards and the intent of the Gardens of Stone SCA Plan of Management.

The following methods will be applied during construction:

- All accommodation cabins, decking platforms, and shelters will be prefabricated offsite to the greatest extent practicable. Prefabrication allows for precision assembly, reduced waste, and minimised on-ground construction time.
- Modules and materials will be transported to site using a combination of light vehicles and helicopter lifts, depending on site access, slope, and vegetation sensitivity.
- Components will be assembled manually or using small plant (e.g. mini excavator, tracked loader, or powered wheelbarrow). Machinery will be limited to designated access routes and previously disturbed areas.

The following machinery and equipment will be required for the proposed activity:

- hand tools
- generator
- brush cutters
- chainsaw
- slasher/tritter
- powered wheelbarrow with trailer
- mini excavator / possie track loader
- various delivery vehicles for materials
- helicopter

6.2.10 Reveal, storage and on-site management for materials used in construction

Construction materials will be stored within the construction footprint area and on existing roads if required.

To reduce on-site vehicle movements, materials will be airlifted or transported by vehicles in pre-bundled loads.

All waste materials generated during the course of the works, including packaging and non-reusable items, will be collected and removed from site. Disposal will occur at appropriately licensed waste management facilities in accordance with regulatory requirements.

6.2.11 Environmental safeguards and mitigation measures

The following environmental safeguards and mitigation measures will be adopted during the construction phase. Additional safeguards and mitigation measures are identified in Section 9 of this REF.

- A Construction Environmental Management Plan (CEMP) and Erosion and Sediment Control Plan (ESCP) will be prepared prior to commencement.
- Temporary erosion and sediment barriers (e.g. coir logs, silt fencing) will be installed to protect adjacent vegetation and waterways.
- Strict hygiene and biosecurity protocols will apply to all machinery and equipment to prevent the spread of *Phytophthora cinnamomi* or Myrtle Rust.
- Vegetation clearing will be limited to that essential for safety and access, with all mature and hollow-bearing trees to be retained. Cleared vegetation will be mulched and reused on site.
- Noise and dust will be managed through scheduling of works during standard hours and damping down of dust as needed.
- Machinery movements and earthworks will be restricted during rainfall, wet weather and high wind conditions.
- All waste materials including personal rubbish will be removed and deposited in an approved waste receptacle.
- Visual inspection of site post-completion of the work to ensure the area is clean and available for the safe use by members of the public.

6.2.12 Sustainability measures

Sustainability measures are detailed in the *Sustainability assessment for built facilities and structures*, located at **Attachment F**. The sustainability assessment addresses Criterion 2 (sustainable resource use) and Criterion 3 (appropriate built form and scale) in accordance with section 151 of the NPW Act for the grant of leases within a reserve, including new buildings.

Sustainability is proposed through:

- **Siting** - design relies on passive climate control achieved through natural cross-ventilation, canvas shading, and thermal zoning of spaces.
- **Scale and mass** – limiting building footprints and height.
- **Materials** – using prefabricated structures to minimise waste and site disturbance, material selection that emphasises natural, durable materials with low embodied energy and high recyclability at end-of-life.
- **Energy systems** – using solar photovoltaic panels and battery storage for supply, using supply for LED lighting a high-efficiency refrigerator, water pumping systems, and wastewater treatment operation only. Use of bottled gas limited to heating water for showers and hand washing, cooking appliances in the communal kitchen, and heating in communal gathering spaces only.
- **Water management** – rainwater collection on site with water use minimised by limiting water fixtures and enforcing shower protocols, in addition to limitations on personal water use.

- **Greywater treatment** - on-site treatment to ensure greywater effluent meets environmental standards before release.
- **Black water** (sewage from toilets) – fully contained and extracted by helicopter to minimise environmental impacts.
- **Waste management** – water minimised by prioritising avoidance, reuse and recycle principles, in addition to controlled disposal.
- **Construction scheduling** - aim to reduce helicopter and vehicle movements to minimise emissions.
- **Rehabilitation/removal** - lightweight construction system that enables disassembly and material recovery rather than demolition, with natural materials being biodegradable or recyclable.

6.2.13 Construction timetable and staging and hours of operation

Work will occur during standard daylight hours to minimise noise and environmental disturbance:

- Monday to Friday: 7:00 am – 5:00 pm
- Saturday: 8:00 am – 1:00 pm
- No work will be undertaken on Sundays or public holidays unless approved by NPWS for safety or weather-related reasons.

Works will be paused during periods of heavy rainfall, high winds, or extreme weather to protect soil stability and contractor safety.

7. Reasons for the proposed activity and consideration of alternatives

7.1 Objectives and reasons for the proposal

The objective of the proposed activity is to provide serviced accommodation and guided tour operations for multi-day walking experiences on the Gardens of Stone Pagoda Walk.

The bush camps and guided tour operations will offer an enhanced visitor experience on the Gardens of Stone Pagoda Walk to improve access without compromising the experience of independent walkers. The proposal provides comfortable, low-impact overnight accommodation to enable multi-day walking experiences for a wider range of visitors, including those who may not have the equipment or experience for self-supported camping, and for those who would prefer to experience the walk in a safe and supported environment.

The proposal also encourages investment and expertise from leaders with a successful track record in sustainable tourism development, while enabling NPWS to continue delivering world class visitor infrastructure.

The proposal is consistent with the Gardens of Stone SCA Plan of Management outcome to establish a major sustainable visitor destination in the greater Blue Mountains. It also aligns with the objective to establish a multi-day walking experience and low-impact accommodation as an alternative for walkers.

7.2 Consideration of alternatives

Five potential bush camp sites, or accommodation nodes, are identified within the Gardens of Stone SCA Plan of Management.

The three sites which form the basis of this proposal were selected for development due to the following factors:

- environmental suitability with low impact on threatened species and Aboriginal cultural heritage sites
- placement adjacent existing tracks with minimal need for additional clearing
- location along the multi-day walk providing suitable overnight accommodation locations and scenic viewpoints.

The three sites were also identified in the 2024 notice of intent to lease, exhibited for public comment.

The notice of intent to lease envisaged the treatment of toilet waste would be included as part of the proposal. Remote toilets, consistent with NPWS Park Facilities Manual, and a fly-in fly-out sewage system, where waste is collected in tanks and flown out for treatment, is now proposed because it minimises environmental impacts and simplifies installation and maintenance. This is also consistent with NPWS toilet facilities at Deep Pass campground and proposed at NPWS public campgrounds intended to support the Pagoda Walk.

Different siting opportunities were also considered within the general site boundaries. The proposal considered the appropriate location for placement of the amenities, the greywater treatment mound, communal building and cabins to minimise environmental impacts, and to consider prevailing weather patterns and provide visitor comfort.

The 'Do-nothing' option:

The 'Do-nothing' option is not considered an appropriate option as the proposal is consistent with the Gardens of Stone SCA Plan of Management and will contribute to establishing a

major new visitor destination in the Blue Mountains. The 'Do-nothing' option would also inhibit a significant strategic investment opportunity which would deliver new job, training and economic benefits to the region. Furthermore, the proposed activity is consistent with objects of the NPW Act and the management principles for a State Conservation Area (refer to Section 3.1.1 of this REF).

7.3 Justification for preferred option

The preferred option outlined in this REF has been identified following a detailed site suitability assessment (see Section 7.4 and **Attachment E**). The proposal is justified on the following grounds, as it will:

- Offer improved and desirable levels of accommodation and infrastructure, accommodating a broader range of visitors to the region
- Result in reduced environmental impacts due to toilet waste collection. The fly-in fly-out sewage system is preferred over onsite treatment of toilet waste (e.g., septic tanks, soakage trenches) as it requires minimal modification of ground conditions and eliminates risks of leaking nutrients, pathogens, or chemicals into soil and nearby waterways, providing better environmental outcomes. This approach is consistent with Appendix C of the *Sustainability Assessment Criteria for visitor use and tourism in New South Wales national parks*, which states preference is given to systems that are proven to be fit for the intended purpose with least risk to the environment.

7.4 Site suitability

A site suitability assessment has been undertaken by NPWS, considering site character and landscape context. A site suitability assessment for the sites which are the subject of this activity was initially conducted in 2022 to inform the Gardens of Stone SCA Plan of Management and Master Plan. Following further analysis, a detailed site suitability assessment has been completed to inform this proposal (**Attachment E**). Key considerations are outlined below.

7.4.1 Site character

Physical Character

The sites are located within the Gardens of Stone SCA, an area of outstanding natural and cultural significance, including nationally significant geological features. The park has been used over many years for sightseeing, walking, 4-wheel driving, trail bike riding and camping, which has resulted in the incremental formation of numerous tracks, lookouts and camping areas. As a result, negative impacts of recreation on vegetation are widespread. The sites which are the subject of this activity are characterised by obvious and permanent environmental modifications, including heavily degraded access roads and cleared areas from previous use. Despite bushfire impacts and vegetation loss from recreational vehicle activity, bushland remains the predominant landscape feature and soil structures are largely intact.

Social Character

Evidence of human activity is clearly apparent throughout the general area, with cleared spaces, impacted vehicle roads, campfires, service roads, and utility infrastructure. The park experiences frequent human contact from recreational users who access the sites via private motor vehicles.

Management Character

The area benefits from established infrastructure and active management, with some maintained roads and trails, NPWS signage, regulatory notices, management gates, and information signs communicating rules at park entrances. Visitor access to roads and trails is frequent, and ongoing mining operations in the vicinity require regular access to nearby monitoring points.

According to the classifications outlined in the 'Sustainability assessment criteria for visitor use and tourism in NSW national parks' guidelines, the site character of all three sites is considered to be 'partially modified natural and cultural heritage condition' (**Attachment E**).

7.4.2 Landscape context

Physical Character

Gardens of Stone SCA is an area of outstanding natural and cultural significance. The complex rocky landforms of the upland plateau provide a diversity of habitats for plants and animals, resulting in rich biodiversity. The reserve was created from parts of Newnes, Wolgan, and Ben Bullen state forests, with obvious and permanent environmental changes from previous logging operations and damaging recreational use. Mining activity continues within the reserve with clearly evident infrastructure, including a large active sand quarry located on a visitor entry route.

The area contains an extensive network of over 700 kilometres of roads and trails, the majority of which are heavily disturbed and eroded, and identified for rehabilitation and closure. Some access roads are in poor condition due to sustained heavy recreational vehicle use. There are significant cleared areas and denuded landscapes across the reserve.

Social Character

Human presence is clearly apparent throughout the reserve, with some areas experiencing particularly high concentrations of people and activities. Four-wheel drive activity has been the predominant form of recreation, with little sense of isolation in popular 4WD areas and frequent human contact expected. The establishment of new visitor facilities since the reserve gazettal, including walking tracks, lookouts, car parks, and picnic areas, has encouraged more sustainable nature-based visitation.

Management Character

The reserve demonstrates active and visible management, with NPWS maintaining an office in Lithgow and staff regularly present throughout the area. 4WD and trail bike activity is common, with targeted compliance efforts focused on unregistered vehicles. Ongoing mining operations within the park require regular access to visible infrastructure and monitoring points. Park signage is present, including large information signs at entry points and directional and regulatory signs at key locations, with rules and regulations clearly communicated to visitors.

According to the classifications outlined in the 'Sustainability assessment criteria for visitor use and tourism in NSW national parks' guidelines, the landscape context of all three sites is considered to be 'partially modified natural and cultural heritage condition' (**Attachment E**).

7.4.3 Strategic site assessment

As required by NPWS's site suitability considerations for the provision of leases associated with built structures and provision of accommodation for visitors and tourists, and the 'partially modified' site character and landscape context conditions, a strategic site

assessment has been completed. Further detail is outlined below, in accordance with the 'Sustainability assessment criteria for visitor use and tourism in NSW national parks' guidelines.

Location

Accommodation node locations were selected to enable a multi-day walk from Lithgow to the Glow Worm Tunnel while preserving the visitor experience for independent bushwalkers on the Gardens of Stone Pagoda Walk. Sites were deliberately positioned below ridgelines so that significant natural features remain the dominant visual elements in the landscape. Proximity to existing 4WD roads was prioritised to minimise environmental disturbance during construction and ongoing maintenance. Locations were also chosen to maintain visual amenity and avoid mapped threatened ecological communities. Avoiding interactions with existing mining infrastructure and minimising road crossings were also key considerations in the selection process. Final site choices were informed by on-ground inspections with Traditional Custodians to ensure cultural heritage values were appropriately considered.

Initially, seven potential sites were identified in the draft Gardens of Stone State Conservation Area Plan of Management exhibited in 2022; however, following further assessment and public feedback, this was refined to five sites in the final plan, with development limited to up to four of these locations.

Park management

The development and operation of visitor accommodation at the identified sites aligns with core park management objectives by supporting public appreciation and enjoyment of natural areas. Partnering with tourism sector leaders enables the delivery of high-quality infrastructure while drawing on external expertise and investment from organisations with proven capability in tourism development, cultural and community programs, employment initiatives and local business partnerships. The lessee will manage and operate the accommodation sites in accordance with lease conditions, which will be finalised following the determination of this REF. To protect significant landscape values, site development will not occur on pagoda formations, ensuring these key geological features remain conserved. An operational management plan will be developed to support protection of pagodas, including guest education and pre-walk briefings. The use of elevated boardwalks will enhance protection of pagodas and vegetation by ensuring guest access is restricted to designated areas.

Park setting

The Gardens of Stone SCA is an area of significant natural and cultural values. It is home to nationally significant pagoda landscapes and is an area of rich biodiversity, including more than 1,000 plant species, 33 vegetation communities and 42 threatened animal species. The reserve has experienced extensive and long-term impacts from logging, mining and damaging recreational use. All bush camp sites are accessed via existing management trails.

Overall, the sites are considered suitable for the proposed visitor accommodation given they are in modified landscapes and are strategically aligned with established planning and management objectives for the Gardens of Stone SCA. The sites are located within an already disturbed environment where existing access roads, cleared areas, and long-term impacts from recreational vehicle use have altered natural conditions.

As a result, the proposal can be accommodated without introducing substantial new impacts or altering the broader landscape character. The locations have been selected to avoid sensitive environmental and cultural heritage features, utilise existing disturbed access routes, and maintain the visual prominence of key natural landforms.

These factors demonstrate that the sites are suitable for the proposed visitor accommodation. Investigation and analysis of the proposal's compatibility with natural and cultural values are addressed as part of this REF.

8. Description of the existing environment

8.1 Overview of the project area

The proposed activity is wholly located within the Gardens of Stone SCA. The park has been used over many years for sightseeing, walking, 4-wheel driving, trail bike riding and camping. This has resulted in the incremental formation of numerous tracks, lookout points and camping areas. Many of these areas have not been properly planned and constructed. As a result, the negative impact of inappropriate recreation on vegetation across the park is quite widespread (DPE 2022).

However, the Gardens of Stone SCA is still an area of outstanding natural and cultural value. The SCA protects ancient sandstone pagodas, rich eucalypt forests, an array of threatened species and important Wiradjuri cultural heritage. It is also an outstanding destination that will attract visitors and support the continued growth of the Lithgow region's economy (DPE 2022).

The Gardens of Stone Pagoda Walk traverses the Gardens of Stone SCA, Gardens of Stone National Park and the Wollemi National Park. It is an important component in establishing the park as a major tourism destination. The Pagoda Walk is supported by two NPWS walk-in public campgrounds as shown in **Figure 1** and **Figure 4**.

The proposed activity will support the Pagoda Walk, providing alternative accommodation for walkers who may not have the required equipment or experience for multi-day walking, or prefer to walk in a supported guided environment. This will allow a greater range of users to experience the Pagoda Walk and benefit from the knowledge of their guides. Use of the Pagoda Walk by independent walkers will not be restricted by the proposed activity.

The bushland associated with the three proposed bush camps is located within the north-eastern portion of Gardens of Stone SCA (which has an area of about 28,322 ha). The area is generally bounded by the existing network of trails within the SCA, with access provided via Glowworm Tunnel Road, south of each site.

The bush camps are primarily located within natural rock outcrops with patches of shrubland, surrounded by a low canopy sclerophyll forest. No waterways or drainage lines intersect with any of the bush camps or adjoining areas (refer to Section 8.2.3 of this report for further details). The area was subject to a bushfire that occurred throughout the Gardens of Stone SCA in 2019-2020.

According to monthly rainfall figures from Lithgow (Newnes Forest Centre), the mean annual rainfall experienced by the study region is 1073.1 mm, with the greatest falls of 114.1 mm recorded in February (Lesryk 2025). January has a mean maximum summer temperature of 23.5 C, while July is the coldest month with a mean minimum of -1.1 °C.

8.2 Natural values

8.2.1 Geology, geomorphology and topography

The Gardens of Stone SCA Plan of Management (DPE 2022) outlines the significance of the SCA in part due to the national significant pagoda landscapes. The weathering of Triassic-era sandstones on the western margin of the Sydney Basin has resulted in a striking landscape of rocky landforms, including massive beehives, domes and plates known as pagodas.

As outlined in **Table 13**, the geology of the area is predominantly Narrabeen Group sandstones. The proposed method for footings and greywater treatment as described in Section 6 are in response to the sandstone formations and shallow soils.

8.2.2 Soil types and properties (including contamination)

Lesryk (2025) has considered the soil types and properties for the proposed activity area. The Soil Landscapes of the Wallerawang 1:100,000 sheet (King 1992), and the SEED Dataset mapping (State Government of NSW and NSW DCCEEW 1993), identifies that the proposed activity is located within the following soil landscapes (**Figure 17**); Warrangamba, Hassans Walls, Mount Sinai, and Wollangambe.

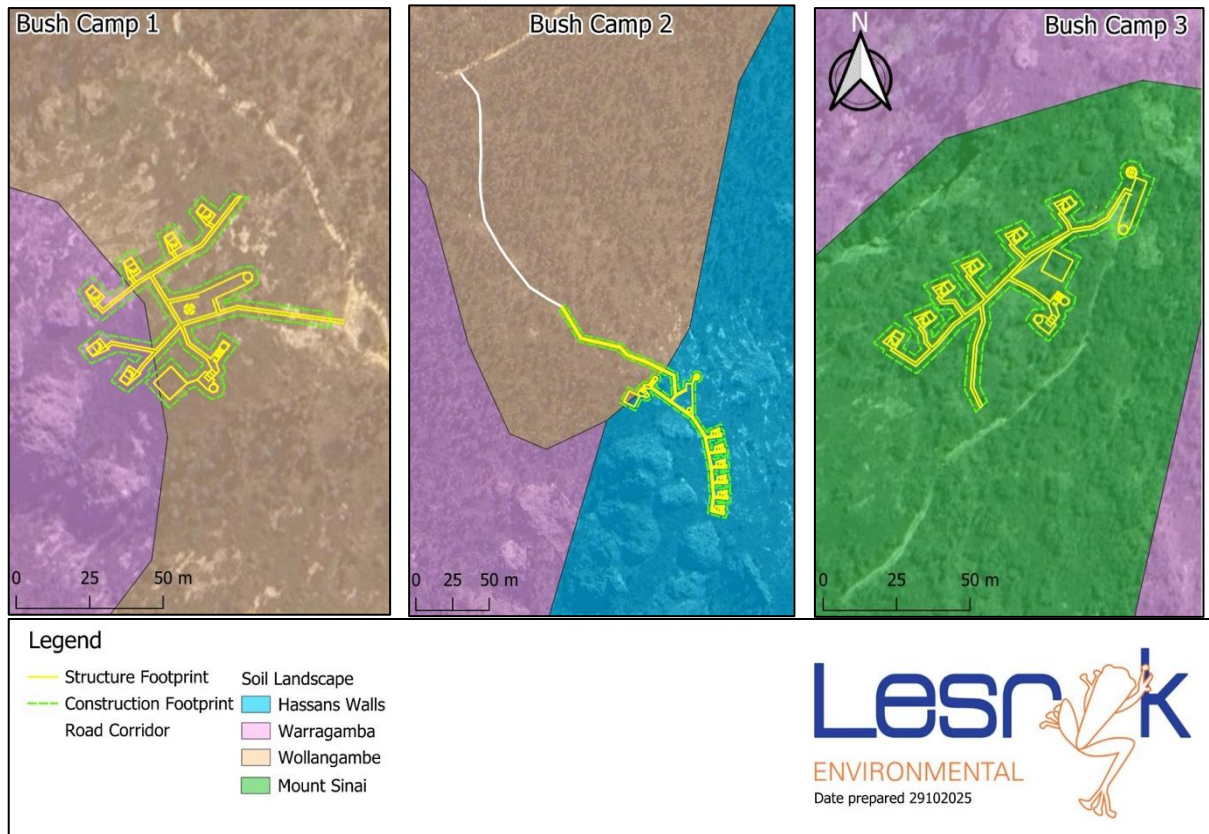


Figure 17: Soil landscapes within the vicinity of the proposed activity

The properties of these soil landscapes are detailed in **Table 13**.

Based on the soil landscape, all locations are expected to have shallow soils. This has been confirmed via ground surveys in considering the location of the proposed bush camps and the need for effluent treatment. The ground surveys indicate that the shallow depth of soil coverage and steep terrain with exposed sandstone limits the land available for treating effluent. As a result, the only viable option for effluent treatment is considered to be the Ecomax amended soil mound which covers the smallest possible area whilst addressing limitations associated with the limited soil depth (Blue Mountains Geological and Environmental Services 2025 – **Attachment G**).

The proposal will include some earthworks, particularly for road improvements. Environmental safeguards and mitigation measures are identified in Section 9.1 of this report, including the establishment of sediment fencing/structures where required in accordance with Landcom’s (2004) ‘Managing Urban Stormwater: Soils and Construction’ (the Blue Book).

Table 13. Geology and soil landscape properties (Lesryk 2025)

Soil landscape	Geology	Topography	Soils	Limitations
Hassans Walls	Cliffs composed of Narrabeen Group sandstones— quartz-lithic sandstones and quartz sandstones, interbedded with thin red, grey and green claystone, shale and occasional conglomerate and ironstone lenses. Soil materials of the colluvial side slopes beneath the exposed cliff lines are underlain by Permian sediments belonging to the Illawarra Coal Measures and the Shoalhaven Group. Sandstone, shale, siltstone, claystone, conglomerate, coal, and torbanite are the main rock types.	Precipitous sandstone cliffs, often 100 – 200 m, are formed above steep to very steep colluvial side slopes. Slope gradients are mostly >40% becoming gentler on lower slopes and narrow drainage flats. Local relief is >100 m. Elevation varies from about 280 m to >1 000 m. Drainage patterns are parallel.	Shallow discontinuous Lithosols/ Siliceous Sands on small rocky ledges on cliffs; moderately deep stony Lithosols/ Siliceous Sands on upper slopes and recently deposited talus; moderately deep Yellow Podzolic Soils and Brown Podzolic Soils on lower slopes; shallow Sands/Lithosols along narrow steep deeply incised drainage lines and moderately deep Sands/Lithosols along narrow drainage flats.	Severe rock fall hazard, steep slopes, extreme water erosion hazard, mass movement hazard, severe foundation hazard, rock outcrop and localised shallow soils, high run-on, localised non- cohesive soils, mine subsidence district.
Warragamba	Narrabeen Group—quartz sandstone and quartz-lithic sandstone interbedded with thin red, grey and green claystone, shale and occasional conglomerate and ironstone lenses. Thin outliers of Hawkesbury Sandstone in the north-eastern corner of the map sheet may occur.	Rounded crests and moderately to steeply inclined side slopes. Crests are narrow (<50 m) and convex. Localised rock outcrop in the form of small benches, cliffs and low broken scarps (generally <25 m). Local relief is <100 m. Slopes are generally <35%. Elevation is generally >600 m.	Shallow (<30 cm) Siliceous Sands/Lithosols, Earthy Sands and Yellow Earths on crests; moderately deep (<100 cm) Earthy Sands, Yellow Earths and Red Earths on side slopes; moderately deep (<120 cm) Yellow Podzolic Soils and Gleyed Podzolic Soils developed over shale lenses; shallow (<50 cm) Siliceous Sands/Lithosols on small rock ledges and low broken scarps.	High to severe water erosion hazard, steep slopes, shallow soils, localised rock fall hazard, localised rock outcrop, low soil fertility.

Soil landscape	Geology	Topography	Soils	Limitations
Wollangambe	Narrabeen Group—quartz sandstone and quartz-lithic sandstone interbedded with thin red, grey and green claystone, shale and occasional conglomerate and ironstone lenses. Thin outliers of Hawkesbury Sandstone in the north-eastern corner of the map sheet may occur.	Rounded crests and moderately to steeply inclined side slopes. Crests are narrow (<50 m) and convex. Localised rock outcrop in the form of small benches, cliffs and low broken scarps (generally <25 m). Local relief is <100 m. Slopes are generally <35%. Elevation is generally >600 m.	Shallow (<30 cm) Siliceous Sands/Lithosols, Earthy Sands and Yellow Earths on crests; moderately deep (<100 cm) Earthy Sands, Yellow Earths and Red Earths on side slopes; moderately deep (<120 cm) Yellow Podzolic Soils and Gleyed Podzolic Soils developed over shale lenses; shallow (<50 cm) Siliceous Sands/Lithosols on small rock ledges and low broken scarps.	High to severe water erosion hazard, steep slopes, shallow soils, localised rock fall hazard, localised rock outcrop, low soil fertility.
Mount Sinai	Narrabeen Group including the Banks Wall Sandstone, Mount York Claystone and Burra-Moko Head Sandstone Members of the Grose Sandstone Formation and the underlying Caley Formation. Lithology is predominately quartz sandstone and quartz-lithic sandstone occasionally interbedded with thin ironstone, conglomerate, red, grey and green claystone and shale lenses.	Narrow rocky convex crests and rolling to steep hills. Local relief is up to 130 m. Slopes are steep to moderately inclined with slope gradients typically more than 30%. Elevation ranges from approximately 900 - 1 180 m. Rock outcrop is abundant as sloping platforms and occurs as a series of horizontal benches downslope. "Pagoda" or beehive shaped rock formations of alternating ironstone and sandstone layers are conspicuous. Narrow, extremely steep protected valleys occur between and below pagodas.	Very shallow (30 cm) stony sands, Lithosols on crests and sideslopes with rocky benches; shallow (<100cm) Earthy Sands and occasional Yellow Earths on insides of benches and in deeply weathered joint lines in the Narrabeen Group sandstones; shallow Earthy Sands in narrow incised valleys.	Extreme water erosion hazard, rock outcrop, steep slopes, rock fall hazard, wind erosion hazard; stony, shallow, acid, non-cohesive highly permeable soils of low fertility.

8.2.3 Watercourses, waterbodies and their catchments

There are no mapped waterways or waterbodies in close proximity to the sites. During field investigations undertaken by Lesryk (2025), there were no unidentified waterways or drainage lines noted within or close to the three proposed bush camp sites.

However ephemeral drainage lines are mapped as occurring in proximity to the proposed bush camps and there are two waterways mapped as Key Fish Habitat within 200m of each of the three bush camps (see **Figure 18**). These are Carne Creek and an unnamed drainage line. The bush camps are located substantially above the level of the waterways which are in deep gullies.

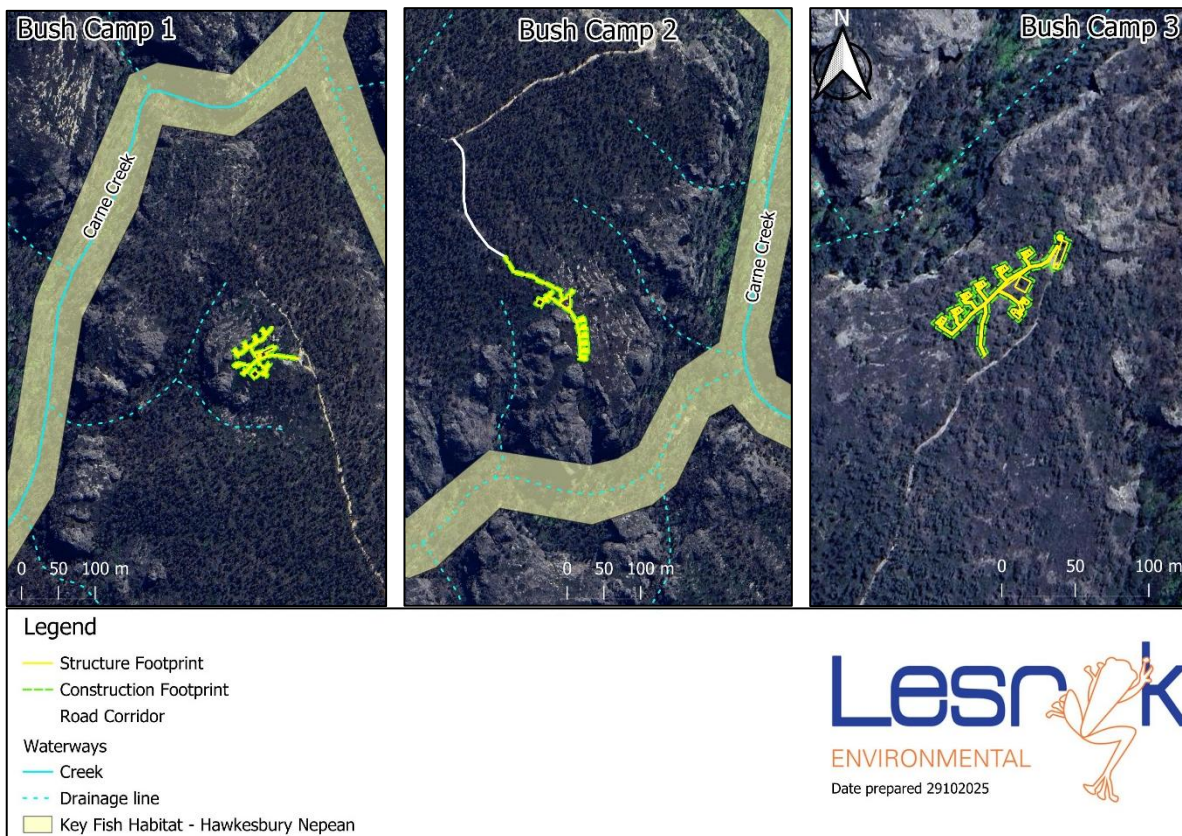


Figure 18: Waterways within, and in the vicinity of, the proposed activity.

As discussed in Section 6, the proposal includes disposal of toilet waste with capture in pods and retrieval via helicopter. Disposal of toilet waste off-site significantly limits pollutant loadings from both volume and component perspectives.

The proposed greywater treatment, which includes water from dish washing, hand basins and showering, is an Ecomax system consisting of a conventional septic tank and leach drain or soak well which is modified by the addition of a filter bed to the leach drain. This system provides a high level of effluent treatment. The system has been successfully utilised in areas prone to surface waterlogging and elevated water tables, and on sites in close proximity to watercourses and waterbodies.

The high level of effluent treatment achieved by the Ecomax system, especially with regard to phosphorus (see **Table 14**), does not pose a threat to the quality of ground waters or surface waters (see **Attachment G**).

Table 14. Anticipated Ecomax Treatment Levels

Parameter	Anticipated Treatment Effluent Concentration
Biochemical Oxygen Demand	< 5mg/L
Suspended Solids	< 5mg/L
Total Nitrogen	5mg/L
Total Phosphorous	0.01-0.05mg/L
Faecal Coliforms	0cfu/100mL

The Flood Planning Map of Lithgow Local Environmental Plan does not identify the proposed activity area or any locations within proximity of the sites to be within a Flood Planning Area. The location of the bush camps, well above the water level of the Carne Creek, also ensures minimal potential impact from flooding.

The design of the structures, with footings raising structures less than 500mm off the ground, enables natural drainage to continue. The collection of roof water to three tanks located across the site, at the communal building, the toilets and the showers, assists in reduction of stormwater and will help to decrease the impacts associated with any peak flows and reduce the risk of localised flooding and erosion.

As the proposed activity will be conducted in a State Conservation Area and adjacent to an aquatic environment, mitigation measures are identified within Section 9 of this REF, with key measures identified below (to be included in the CEMP):

Standard Erosion Sediment Control measures will be required to ensure negligible impact on nearby drainage lines. Mitigation measures are identified within Section 9 of this REF, with key measures identified below:

- prior to the commencement of works, sedimentation fencing/structures (e.g. sandbags/geotextile fabric) to be temporarily erected/installed where ground disturbance is predicted
- during construction, these should be inspected and maintained (e.g., sediment build up cleared) as deemed appropriate.

Management measures associated with the effluent management system will also be required. These include an Operational Management Plan that:

- ensures measures are in place to limit effluent volume on the site
- addresses the management requirements associated with the effluent management system including the septic tanks, pump well and biotube filters, and the Ecomax amended soil mounds.

During construction and operations, wet weather closure protocols may be put in place at the discretion of NPWS.

Lesryk (2025) has identified low to high potential terrestrial Groundwater Dependent Ecosystem (GDE) within the study area (see **Figure 19**).

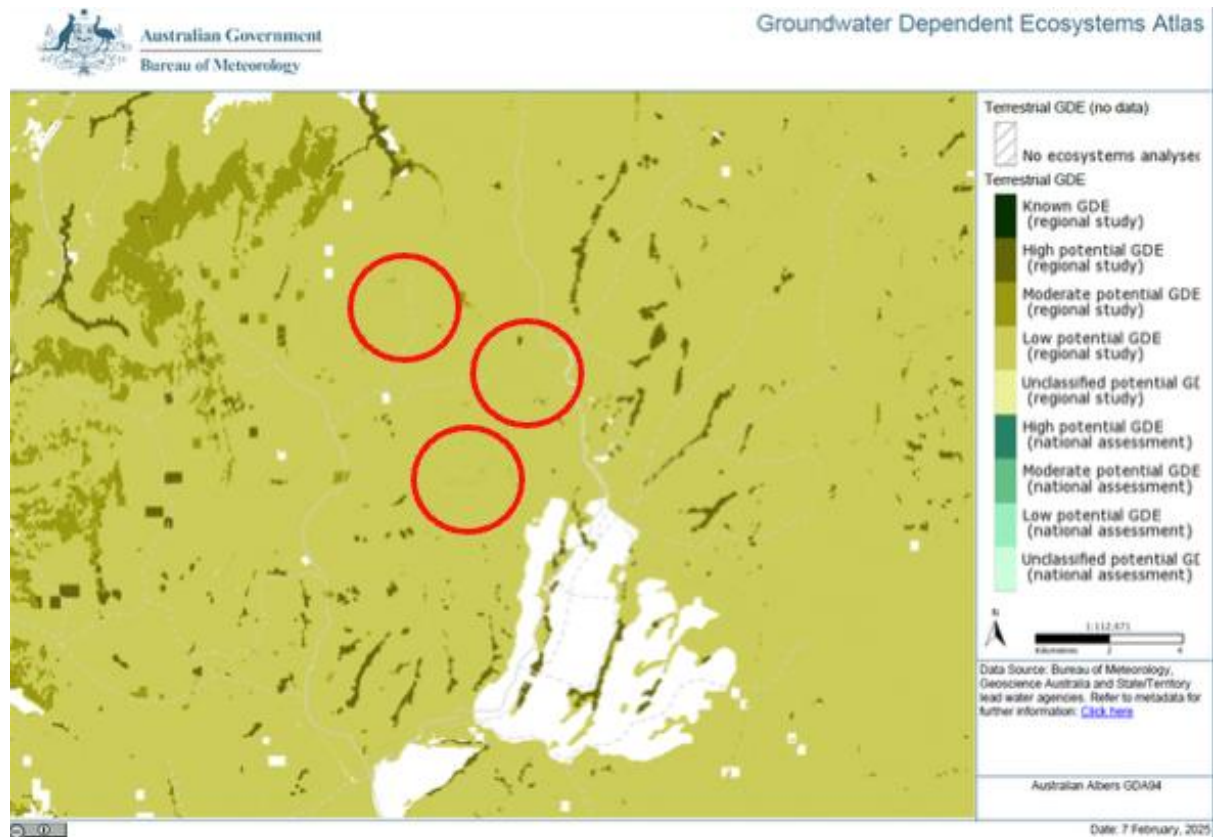


Figure 19 Terrestrial Groundwater Dependent Ecosystem mapping

Given the nature of the waterways/drainage lines present and the extent of the scope of work proposed in relation to the existing character of the proposed bush camps and associated road trails, the proposal is not likely to result in changes to water quantity or water quality that may impact Groundwater Dependent Ecosystems.

With the implementation of the specified mitigation measures, the proposal is not anticipated to cause measurable impacts on surface or groundwater regimes or water quality, and is not expected to facilitate off-site sediment mobilisation.

8.2.4 Coasts and estuaries

There are no coastal or estuarine values, marine parks or aquatic reserves within the vicinity of the proposal. No management considerations are required.

8.2.5 Biodiversity

Overview of terrestrial and aquatic biodiversity

Lesryk Environmental Pty Ltd (Lesryk) conducted an ecological investigation across a cumulative 3.0ha of bushland surrounding three bush camps and connecting access roads within the Gardens of Stone SCA to assess biodiversity impacts and recommend appropriate mitigation measures (**Attachment C**). Prior to conducting field investigations, a review of the Australian Government's Protected Matters Search Tool (PMST) and BioNet Atlas databases was completed to identify species recorded within a 10km radius of the study area. Records are detailed in Appendix A of the Environmental Assessment Report (**Attachment C**).

Following a detailed desktop review, Lesryk undertook investigations in February and November 2025 to:

- identify any plants, animals, fauna habitats or vegetation communities that are of State and/or national conservation significance as listed under the Schedules to the EPBC, BC and/or FM Acts
- assess the structure of fauna habitats and vegetation communities present within, and adjacent to, the proposed bush camps.

The vegetation type at each of the bush camps in accordance with NSW State Vegetation Type Map (SVTM) (State Government of NSW and NSW DCCEEW 2024) is shown in **Figure 20**. From field investigations, including plots in accordance with the Biodiversity Assessment Method (BAM), the following anomalies were noted:

- At bush camps 1 and 3 the SVTM indicated that clearing associated with the management trails was between 10m and 18m in width, while these are only up to 3.5m in width
- The SVTM indicated PCT 0 up to 12 m wide along the route of an old fire trail at bush camp 2, however this has naturally revegetated. This old fire trail is to be used to provide access to bush camp 2.
- Bush camp 3 is mostly mapped as PCT 3865 with a small area of PCT 3687 Newnes Plateau Peppermint-Ash Tall Forest extending into it from the west, however it is entirely vegetated with PCT 3696 Western Blue Mountains Rocky Scribbly Gum Woodland.
- PCT 3865 Western Blue Mountains Pagoda Scrub is mapped as extending into the southern and north-western ends of bush camp 2, however the bush camp is vegetated entirely with PCT 3862 Newnes Plateau Rockplate Heath.
- Bush camp 1 is mapped as PCT 3865, however it is all PCT 3862.
- The western third of bush camp 3 is mapped as PCT 3696, however it is mostly PCT 3865.

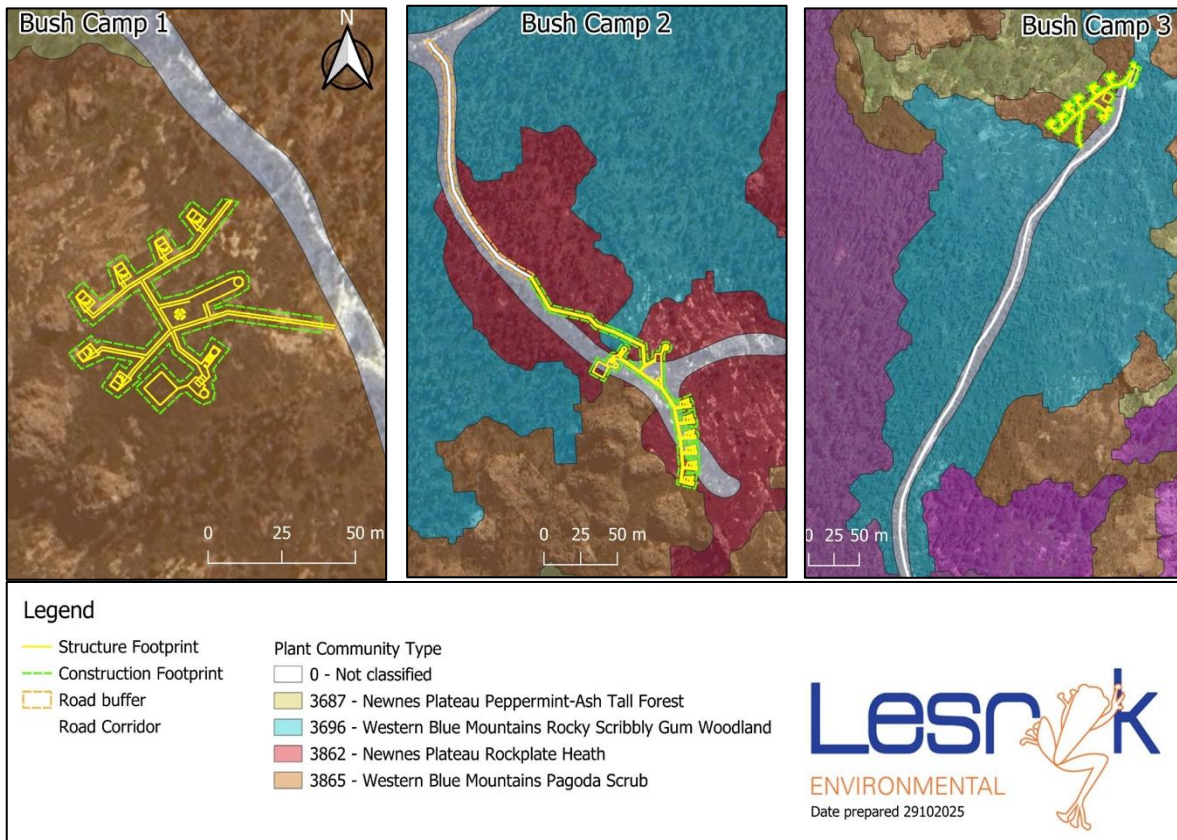


Figure 20: State vegetation type mapping within the proposed bush camps

Estimates of the area that would be affected by the proposal (i.e. where all the zone is cleared or modified) are presented below (Table 15).

Table 15. Plant Community Types

PCT	Estimated area of PCT to be removed/modified (m ²)
0 Not classified vegetation (cleared areas, bare rock etc)	310
3696 Western Blue Mountains Rocky Scribbly Gum Woodland	1875 +320 (access 2) 960 (access 1) = 3155
3862 Newnes Plateau Rockplate Heath	1835 (1) +2130 (2) +180 (access 2) = 4145
3688 Newnes Plateau Silvertop Ash Woodland	1610 (access 1)
3695 Upper Blue Mountains Ridgetop Woodland	400 (access 1)
Total	9,620m²

None of the recorded PCTs are components of any threatened ecological community listed on the BC Act or the EPBC Act. The results of the BAM plots conducted within each camp site are provided in **Attachment C**.

Areas of outstanding biodiversity value or critical habitat

No areas of outstanding biodiversity value or critical habitat exist for any flora, terrestrial fauna or aquatic species, populations or communities occur within, or near to the proposed activity area.

Environmental assets of intergenerational significance (AIS)

No areas associated with assets of intergenerational significance exist within or adjacent to the study area.

Threatened ecological communities

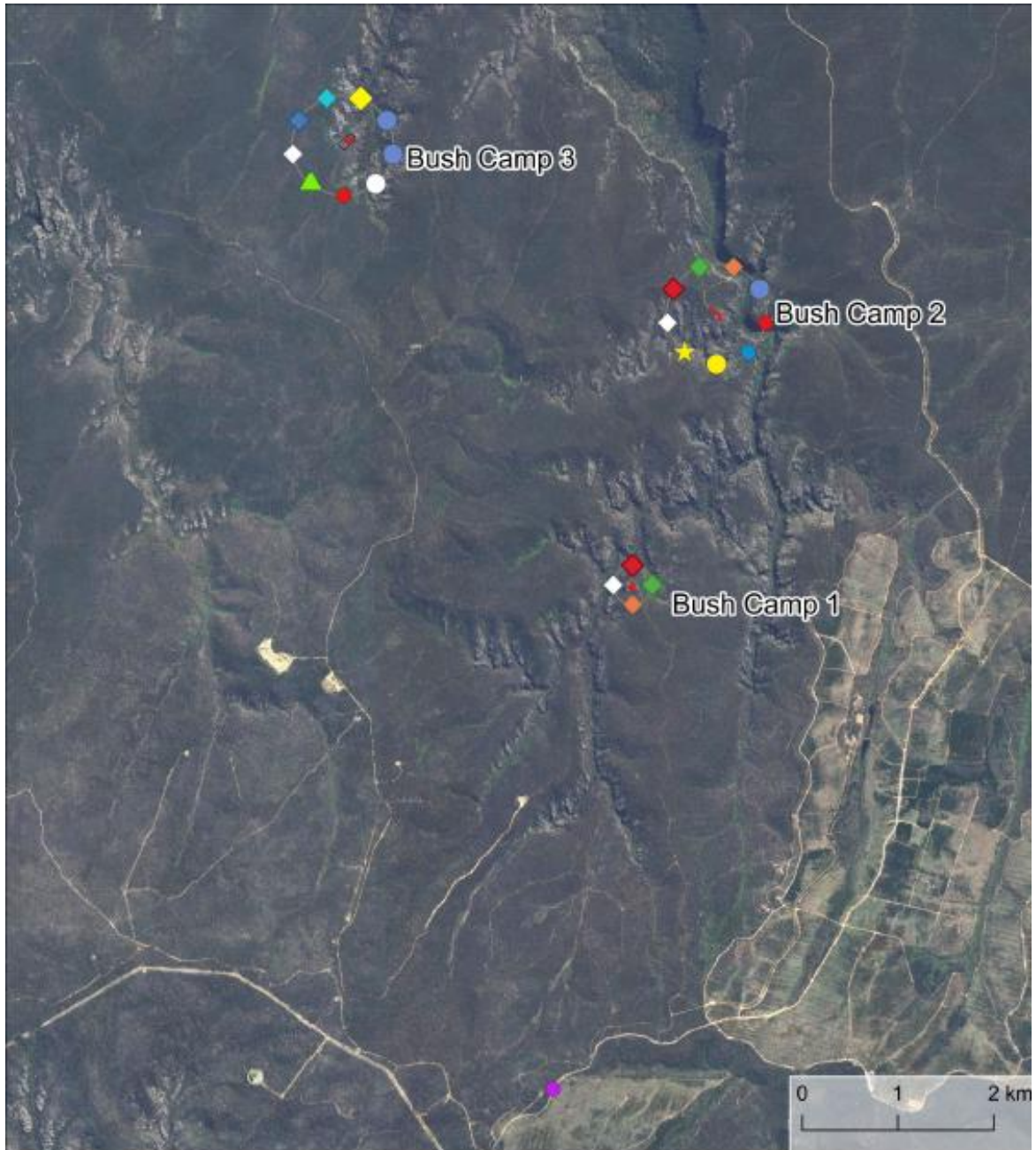
Desktop review and site surveys undertaken by Lesryk (2025) in February and November 2025 concluded that there are no threatened ecological communities or flora species listed under the BC or the EPBC Acts within the proposed activity area.

Threatened species and populations

Following detailed desktop analysis (**Appendix A, Attachment C**), field investigations detected 26 native mammals, 38 native birds, six reptiles, three amphibian and one exotic species, 15 of which, are listed under the EPBC and/or BC Acts:

- Insectivorous microbat species:
 - Yellow-bellied Sheathtail-bat (*Saccolaimus flaviventris*) – listed as Vulnerable under the BC Act
 - Large-eared Pied Bat (*Chalinolobus dwyeri*) – Endangered under the EPBC and BC Acts
 - Eastern False Pipistrelle (*Falsistrellus tasmaniensis*) – Vulnerable under the BC Act
 - Southern Myotis (*Myotis macropus*) – Vulnerable under BC Act
 - Greater Broad-nosed Bat (*Scoteanax rueppellii*) – Vulnerable under the BC Act
 - Eastern Cave Bat (*Vespadelus troughtoni*) – Vulnerable under the BC Act
 - Large Bent-winged Bat (*Miniopterus orianae oceanensis*) – Vulnerable under the BC Act
- White-throated Needletail (*Hirundapus caudacutus*) – Vulnerable under the EPBC and BC Acts
- South-eastern Glossy Black-Cockatoo (*Calyptorhynchus lathami lathami*) – Vulnerable under the EPBC and BC Acts
- Gang-gang Cockatoo (*Callocephalon fimbriatum*) – Endangered under the EPBC and BC Acts
- Sooty Owl (*Tyto tenebricosa*) – Vulnerable under the BC Act
- Pilotbird (*Pycnoptilus floccosus*) – Vulnerable under the EPBC and BC Acts
- Scarlet Robin (*Petroica boodang*) – Vulnerable under the BC Act
- Rosenberg's Goanna (*Varanus rosenbergi*) – Vulnerable under the BC Act
- Giant Dragonfly (*Petalura gigantea*) – Endangered under the BC Act.

The locations of the recordings are identified in **Figure 21**: .



Legend

- | | |
|-----------------------------|---------------------------------|
| Threatened Fauna Recorded | ● Pilotbird |
| ◆ Eastern Cave Bat | ▲ Rosenberg's Goanna |
| ◆ Eastern False Pipistrelle | ● Scarlet Robin |
| ● Gang-gang Cockatoo | ● Sooty Owl |
| ★ Giant Dragonfly | ● SE Glossy Black-Cockatoo |
| ◆ Greater Broad-nosed Bat | ◆ Southern Myotis |
| ◇ Large Bent-winged Bat | ○ White-throated Needletail |
| ◆ Large-eared Pied Bat | ◆ Yellow-bellied Sheathtail Bat |



Figure 21: Locations of recorded threatened fauna species (dispersed around bush camp sites)

In regards to the detection of the threatened fauna recorded:

- The Gang-gang Cockatoo, South-eastern Glossy Black-Cockatoo and White-throated Needle-tail were recorded incidentally as fly-overs or foraging individuals, with no evidence of breeding or permanent residency within any of the bush camps.
- The Sooty Owl was detected while spotlighting from the vehicle, approximately 5.2 km south of the proposal area, well outside the footprint of works.
- All insectivorous microbat species were detected through the AnaBat™ echolocation detectors deployed across the three bush camp sites:
 - The Large-eared Pied Bat, Eastern False Pipistrelle, Greater Broad-nosed Bat and Large Bentwing Bat were detected at bush camp 1
 - The Eastern False Pipistrelle, Greater Broad-nosed Bat and Large Bentwing Bat were detected at bush camp 2
 - The Yellow-bellied Sheath-tail-bat, Southern Myotis, Eastern Cave Bat and Large Bentwing Bat were detected at bush camp 3
- The Pilotbird was detected at all three bush camp sites through the SongMeter™ acoustic surveys and incidentally by the ecologists near Bush Camp 3.
- The Scarlet Robin was directly observed by the ecologists while carrying out point-count surveys in bush camps 2 and 3.
- Rosenberg's Goanna was detected by the infrared camera positioned within bush camp 3.
- The Giant Dragonfly was incidentally observed by the ecologists during the field investigation of bush camp 2.

8.3 Cultural values

8.3.1 Aboriginal cultural heritage

Gardens of Stone SCA contains numerous Aboriginal heritage sites of high cultural significance to the Wiradjuri people. Recorded heritage sites within the park include rock art sites, grinding grooves, wells, occupation deposits within rock shelters, and artefact scatters. The swamps located on the Newnes Plateau historically provided continuous food resources for Aboriginal people, contributing to sustained occupation of the area. Rock shelters adjacent to these swamp systems contain high concentrations of artefact material, indicating intensive use over extended periods. The park provides opportunities for the Wiradjuri community to further their aspirations for community, culture and Country (Gardens of Stone SCA Plan of Management 2022).

An Aboriginal Cultural Heritage Assessment has been prepared for the Gardens of Stone SCA by Kelleher Nightingale Consulting Pty Ltd (KNC) (December 2025) (**Attachment B**). This report considers the improvements and upgrades proposed in the Gardens of Stone SCA master plan, and includes the three proposed bush camps and connecting access roads, referred to in the KNC report as accommodation nodes 3, 4 and 5.

The bush camp locations were investigated by a suitably qualified archaeologist between August 2022 and February 2025, including a desktop review and site assessment. The investigations involved visual inspection to identify Aboriginal objects or sites and assess the potential of the archaeologically sensitive landforms. Local representatives from Mingaan Wiradjuri Aboriginal Corporation and Bathurst Aboriginal Land Council were present for site visits in August 2022.

For all bush camp sites, rock platforms were inspected for rock engraving sites. The visual inspection of the sites did not identify any Aboriginal archaeological sites or areas of archaeological potential. The Aboriginal Cultural Heritage Assessment Report (**Attachment B**) identifies no impacts to Aboriginal cultural heritage at the accommodation nodes and

provided no specific management requirements. The report recommends opportunities are considered for Aboriginal heritage interpretation and management associated with the bush camps/accommodation nodes.

An Aboriginal Heritage Information Management System (AHIMS) search was also completed, with no known sites recorded within the vicinity of the proposed activity (**Attachment K**).

In the unlikely event that potential items of Aboriginal cultural heritage are discovered during the work, a stop work protocol would be implemented for unexpected finds (refer to Section 9.5 of this REF).

8.3.2 Historic heritage values

There are several historic sites and artefacts within and adjacent to the Gardens of Stone SCA. These include evidence of early European exploration, historic railways such as the Clarence–Newnes Railway which supported 19th century kerosene and oil shale (torbanite) mines at Newnes in the adjacent Wollemi National Park, and 20th century coalmining (DPE 2022). The nearby Greater Blue Mountains Area is on the World Heritage List and National Heritage List and is considered a Matter of National Environmental Significance under the EPBC Act.

Historic Heritage Information Management System (HHIMS) records confirm there are no world, national, state or local heritage items or conservation areas identified at or near the proposed activity (see **Attachment J**). The proposed activity is consistent with the Gardens of Stone SCA Plan of Management and will not have an adverse impact on any known heritage items at or near the proposed activity sites.

In the unlikely event that potential items of European cultural heritage are discovered during the work, a stop work protocol would be implemented for unexpected finds (refer to Section 9.6 of this REF).

8.4 Social values

8.4.1 Recreation values

The Gardens of Stone SCA provides a range of recreational opportunities that allow visitors to experience and appreciate the park's natural and cultural values. The park is valued for bushwalking, sightseeing, picnicking, and nature-based exploration, supported by its sandstone pagoda formations, cliffs, valleys, and escarpments.

The park's proximity to Lithgow and the Greater Blue Mountains World Heritage Area provides both local and regional visitation, creating opportunities for day trips, extended visits, and educational programs.

The proposed activity contributes positively to the recreation values of the site, providing high-quality recreational experiences. It diversifies park users by accommodating visitors who may not have camping equipment, require additional support, prefer a safer environment or who seek the benefits of a guided walk which provides educational and interpretive experiences. This will increase appreciation of the park's biodiversity, cultural heritage, and scenic values with more park users.

8.4.2 Scenic and visually significant areas

The Gardens of Stone SCA contains landscapes of high scenic and visual significance, including sandstone pagodas, cliffs, escarpments, valleys, and diverse vegetation communities. These features have considerable scenic and aesthetic value for those accessing the park and its surrounds.

The Gardens of Stone SCA Plan of Management identifies that 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.

NPWS engaged Environmental Partnership to compile a Landscape Character and Visual Impact Assessment Report (see **Attachment H**). The purpose of the report is to:

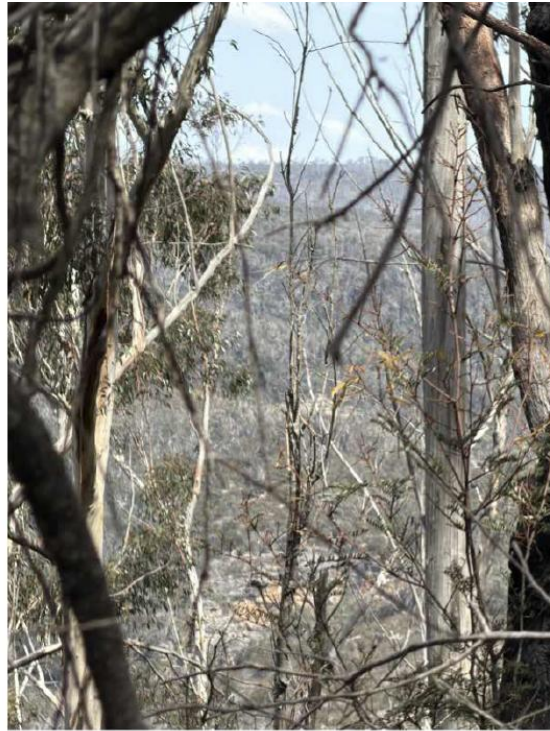
- provide a contextual analysis of topography, vegetation and recreation
- consider the landscape setting of the bush camps
- undertake a visual impact assessment considering visual catchments and impacts on viewpoints
- recommend mitigation measures considering built form and scale, façade and roof materials, reflective surfaces and vegetation, to ensure visual impacts are minimal and appropriate.

The bush camp sites were analysed to consider potential visual impacts from other areas of the Gardens of Stone SCA, such as tracks, lookouts, viewing points and roads. The Gardens of Stone SCA Visitor Infrastructure Master Plan and Gardens of Stone SCA Vehicle Access Strategy were used as a guide to identify potential viewpoints to the bush camp sites. This resulted in the consideration of 16 viewpoints across the three bush camps. Of those viewpoints considered, 14 were considered to have a negligible impact in terms of sensitivity, magnitude and impact. Minor potential impacts were identified for bush camps 1 and 2.

For bush camp 1, Environmental Partnership identified that potential sight lines to the camp are more likely available from the north and north-west. Of the 8 viewpoints considered, impacts greater than negligible were only identified for 1 viewpoint, with this impact identified to be moderate. The site is visible from the connecting track between the Gardens of Stone Pagoda Walk and NPWS public campground, but visibility is very limited due to tree canopy and distance of 1580m to the site. The viewpoint is provided in **Figure 22**, and with the concept, zoomed in, at **Figure 23**. Following the integration of mitigation measures including design considerations and the use of natural timbers, canvas and earth-toned roofing, the impacts were assessed as being low-moderate.



Viewpoint 5.2
GPS Coordinates: -33.33663, 150.21682



Viewpoint 5.2 - 'Zoomed' in view
GPS Coordinates: -33.33663, 150.21682

Figure 22: Bush Camp 1 Viewpoint – Gardens of Stone Pagoda Walk to public campground link track



Figure 23: Bush Camp 1 Viewpoint – Zoomed In view from drone (approximate viewpoint from public campground link excluding vegetation) with concept

For bush camp 2, Environmental Partnership identified that pagoda outcrops partially define and buffer the site to the west, and that sight lines to the bush camp would be available from the eastern side of Carne Creek (within Wollemi National Park), from a 4WD access road approximately 400m away. This road has been revegetated and is marked for closure in the Gardens of Stone SCA Vehicle Access Strategy. Of the 6 viewpoints assessed, impacts greater than negligible were only identified for one viewpoint, with this impact identified to be

high-moderate. Following the integration of mitigation measures including the use of reversed-pitched roofing and the use of natural timbers and earth toned materials, the impacts were assessed as being moderate. The existing distant view and zoomed in view with bush camps is provided in **Figure 24**.

This viewpoint is not considered a popular 4WD or walking track and is marked for closure. The camp structures, at a maximum of 3,500mm high, are lower than the adjacent pagoda structures which will remain visible behind the built structures as illustrated in **Figure 25**. The existing vegetation, the topography and distance to the structures all contribute to minimising the visual impact.



Figure 24: Bush Camp 2 Viewpoint and Zoomed In - 4WD access track and viewpoint east of Carne Creek



Figure 25: Bush Camp 2 Viewpoint – Zoomed in view from 4WD access track and viewpoint east of Carne Creek

For bush camp 3, Environmental Partnership identified that the site is naturally screened by existing landscape and the greatest potential for visual exposure of the site is from the north. However, there are no known informal tracks in the area. Impacts for two locations considered were identified to be negligible.

Environmental Partnership notes the architectural design seeks to minimise visual impact through siting and design, limiting the height of structures to 3,500mm, limiting the area of

structures to 300m² (excluding connecting boardwalks) and utilising materials and colours which blend in with the natural surroundings and reduce visual contrast. The materials choices include:

- hardwood timber walls allowed to age naturally
- industrial canvas (Light Sand)
- Colorbond metal roof sheet in Gully
- low reflectivity glass with no use of stainless steel.

Further, Environmental Partnership noted that for bush camp 2, which has the highest potential visual impact, cabins have a reverse-pitched roof design to reduce visual bulk and have been located behind pagoda formations for wind protection and visual integration. Built form and scale and materials are considered to limit impact on visual amenity and landscape character. Visual impacts are considered further at Section 9.3.

8.4.3 Education and scientific values

The Gardens of Stone SCA Plan of Management (DPE 2022) identifies that the park possesses important education and scientific values, underpinned by both Wiradjuri traditional knowledge and ongoing ecological research. The area provides a valuable setting for scientific study of its distinctive sandstone landscapes, threatened species and ecosystems, and for the development of conservation programs.

The provision of accommodation within the park can directly support and enhance these education and scientific values. Accommodation facilities can serve as a base for research teams and immersive educational programs during off-peak seasons. The inclusion of interpretive information, guided experiences, and environmental management will also promote visitor awareness of the park's natural and cultural heritage.

8.4.4 Interests of external stakeholders

The proposal will provide new recreational opportunities for a range of stakeholders under the management of Wild Bush Luxury. The proposal is consistent with strategic plans made under Division 1 of the *Environmental Planning and Assessment Act 1979*, as discussed in section 3.2.2, including the Central West and Orana Regional Plan 2041 and the Lithgow Local Strategic Planning Statement.

Wild Bush Luxury is committed to employing locals and showcasing produce from the Seven Valleys region. As outlined above, the proposal is expected to deliver up to 30 local jobs including drivers and guides within the first five years of operation. Priority will be granted to local residents and Traditional Owners to enhance community outcomes.

The proposal will also help promote Lithgow as a destination and establish the region as a major new visitor destination, consistent with the NSW Visitor Economy Strategy, Central West NSW Destination Management Plan 2022-2030, Lithgow Regional Economic Development Strategy, Seven Valleys Destination Action Plan 2024-2030 and the Community Strategic Plan Lithgow 2022-2035.

The proposal has considered the views of the Warrabinga Native Title Claimants Aboriginal Corporation and will not adversely impact any Aboriginal cultural heritage sites or adjoining landowners.

8.5 Matters of national environmental significance

A Protected Matters Search for the study area identified 17 threatened flora and 48 threatened fauna species listed under the Schedules of the EPBC, BC and/or FM Acts that

have been previously recorded, or have known occurrences of habitat, within a 10 km radius of the study area (Attachment C).

While previously recorded within and/or predicted as having habitat within 10 km of the sites, the majority of threatened species identified in the area were assessed to have an 'unlikely' or 'low' likelihood of occurrence, given the nature of the habitats, rock outcrops, existing disturbed/modified fire trails and structure of the fauna habitats recorded within each of the bush camps. These species would not occur within, or be reliant upon, the habitats observed within the proposed activity's impact footprint. More suitable and extensive resources are present within the surrounding bushland, including the broader land within Gardens of Stone SCA where populations are known to exist.

In the case of fauna, numerous highly mobile threatened species with large territorial requirements (e.g., bats, birds, ground traversing mammals) may traverse or occupy the proposed activity area on occasions. The field investigations recorded the following Matters of National Environmental Significance (MNES) listed under the EPBC Act within or close to the proposed activity area are as follows:

- White-throated Needletail – listed as Vulnerable under this Act
- South-eastern Glossy Black-Cockatoo – Vulnerable
- Gang-gang Cockatoo – Endangered
- Pilotbird – Vulnerable
- Large-eared Pied Bat – Endangered.

The locations of the MNES in relation to the proposed activity footprint are shown in **Figure 21**:

No threatened ecological communities or flora species listed under the EPBC Act were recorded during the investigation.

Assessments relevant to those recorded threatened species were conducted to determine whether the action has, will have, or is likely to have a significant impact on these MNES (**Attachment C**). The assessments concluded that the proposal would not have a significant impact on the recorded MNES. The proposal is therefore not a controlled action and will not require referral to the Federal Minister for the Environment and Water for further consideration or approval (Lesryk 2025).

9. Impact assessment during all stages of the proposed activity

9.1 Physical and chemical impacts

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. impact on soil quality or land stability?	Yes	Low adverse	<p><i>All activities</i></p> <p>Earthworks will be required for road improvement works and up to 9,620m² of native vegetation will be removed or modified for road improvement works and bush camp structures.</p> <p>The activities could result in the disturbance and exposure of soils and instability associated with imported material during construction associated with road works. This could potentially cause erosion of materials during construction where surface runoff occurs.</p> <p>The mitigation measures are considered sufficient to manage these risks.</p> <p>Greywater treatment will have minimal impacts on the environment and soil quality.</p> <p>An Operational Management Plan will address management and maintenance measures for the proposed greywater treatment system to ensure any risks are managed consistent with the requirements outlined in Attachment G.</p>	<p><i>All activities</i></p> <ul style="list-style-type: none"> • The construction of the three bush camps is to be in accordance with the NPWS Vehicle Access Policy (DPE 2024). • Construction should be undertaken sequentially along the track, with exposed/disturbed areas being compacted and stabilised. • Sediment fencing/structures (e.g., sandbags) should be established as required prior to the commencement of works, and kept in place for the duration of the proposed activity in accordance with Landcom (2004) 'Soils and Construction: Managing Urban Stormwater' (the Blue Book). These are to be maintained and will not be removed until site development is complete or the area is stabilised. • Where applicable, scheduled inspections of these will be made to ensure compliance. • Restrict the location of any temporary stockpile site to existing cleared areas or the proposed construction footprint. • Avoid unnecessary soil disturbance. No trenching for services is permitted. Any services will need to be secured to boardwalks.

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
2. affect a waterbody, watercourse, wetland or natural drainage system – either physically or chemically (e.g. due to runoff or pollution)?	No	Low negative	<p>Carne Creek and drainage lines are located near the proposed activity area as shown in Figure 18.</p> <p>Potential contamination risks from hydrocarbons and other products entering waterways during construction exist. This impact potential is low with the appropriate mitigation measures.</p> <p>The proposed activity includes the disposal of toilet waste off-site via helicopter. Greywater is treated on site via an Ecomax system. The Ecomax mound is located more than the recommended distances of 40m from intermittent watercourses, and 100m from perennial watercourses. The system provides a high level of effluent treatment, especially with regard to phosphorus. Technical advice (see Attachment G) confirms that the discharge from</p>	<ul style="list-style-type: none"> Removed native vegetation is to be mulched and/or utilised as brush matting, to encourage natural regeneration where required. Disturbed surfaces to be compacted before rainfall to minimise potential for erosion and sedimentation during construction. Uncontaminated surplus spoil will be retained and used on-site where applicable. During construction and operations, wet weather closures may be implemented. Prior to operations commencing, an Operational Management Plan will be required for approval by NPWS, consistent with Attachment G. <ul style="list-style-type: none"> Prior to the commencement of works, sedimentation fencing/structures (e.g., sandbags/geotextile fabric) to be temporarily erected/installed where ground disturbance is predicted or adjacent any stockpile locations. During construction, these will be inspected and maintained (e.g., sediment build up cleared) as deemed appropriate, particularly prior to forecast rain events. All chemicals (fuels, concrete) will be stored in impervious bunded areas located at least 40 m from waterways and in accordance with manufacturer's instructions.

Review of Environmental Factors: Wild Bush Luxury Bush Camps

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
			<p>Ecomax systems does not pose a threat to the quality of ground waters or surface waters.</p> <p>The preparation of an Operational Management Plan addressing the Ecomax system is a recommended mitigation measure already identified.</p>	
3. change flood or tidal regimes, or be affected by flooding?	No	N/A	<p>The location of the bush camps, well above the water level of the Carne Creek, also ensures minimal potential impact from flooding from local waterways.</p> <p>The design of the structures, with footings raising structures approximately 0.5m off the ground, enables natural drainage to continue. The collection of roof water to three tanks located across the site assists in reduction of stormwater and will help to decrease the impacts associated with any peak flows and reduce the risk of localised flooding and erosion.</p>	N/A
4. affect or be affected by coastal processes and coastal hazards, including those under climate change projections (e.g. sea level rise)?	No	N/A	N/A	N/A
5. involve the use, storage or transport of hazardous substances, or use or generate chemicals which may	Yes	Low, negative.	It is anticipated that, considering the equipment employed during the proposed activity, there will be requirements to store and re-fuel equipment on site. These will be stored in an adequately bundled and locked receptacle on site.	<ul style="list-style-type: none"> A terrestrial spill kit must be maintained on site at all times. The type and nature of the kit must be commensurate to the type and quantity of hazardous material used on site.

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
build up residues in the environment?				<ul style="list-style-type: none"> Should machinery require re-fuelling this would occur within a bunded area.
6. involve the generation or disposal of gaseous, liquid or solid wastes or emissions?	Yes	Low, negative	<p>The proposed works would result in minimal waste due to the use of prefabricated buildings. Waste from vegetation removal will be retained on site.</p> <p>Minor exhaust emissions may result from vehicles or equipment during construction.</p> <p>The bush camps have been designed with minimal services and utilising sustainable principles. Toilet waste would be transferred off-park to an authorised facility. Other liquid waste would be treated on site. Gas will be available for heating and cooking during operations. These emissions would be minimal.</p> <p>Waste from construction and operations would be disposed at an authorised waste facility.</p>	<ul style="list-style-type: none"> Vehicles would be serviced and operate within standard Transport for NSW guidelines. Vehicles conveying materials to waste disposal sites will be covered. Where possible, construction and demolition wastes would be recycled or reused. Work to be conducted during periods when high winds are not predicted. Any clean surplus excavated soil and pruned vegetation may be retained for use on site. Weed contaminated green waste and any surplus spoil and other materials would be disposed of appropriately at a licensed landfill facility. Any personal rubbish will be removed and deposited in an NPWS approved waste receptacle and recycling methods enacted where appropriate. Visual inspections of the site are to be made at the completion of the work to ensure no urban refuse remains. For storage and handling of gas, comply with Australian Standards such as: <ul style="list-style-type: none"> AS/NZS 1596:2014 – The Storage and Handling of LP Gas AS/NZS 5601.1:2022 – Gas Installations The operational management plan must address appropriate transportation and storage of gas, installation, emergency and risk minimisation, and the maintenance of connections and gas

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
7. involve the emission of dust, odours, noise, vibration or radiation?	Yes	Low, negative short-term	<p>The proposed activity may have minor potential dust impacts associated with work activities and the presence of equipment/vehicles and helicopters.</p> <p>There is expected to be a minor temporary acoustic and vibration impact during construction work associated with works, the presence of personnel, construction equipment and vehicles. The use of helicopters to transport infrastructure to the site and for toilet waste disposal would cause short-term noise, pollution and visual impacts.</p> <p>This is unlikely to significantly impact members of the public due to the distance of the bush camps from highly frequented parts of the park.</p>	<p>appliances to consider personnel safety and environmental safeguards. The plan must be prepared with advice from appropriately qualified gas fitters/engineers.</p> <ul style="list-style-type: none"> • Construction activities would be limited to the period 7.00 am to 6.00 pm Monday to Friday, and 8.00 am to 1.00 pm on Saturday. • All vehicles and equipment to comply with industry noise guidelines.

9.2 Biodiversity impacts

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. affect a declared area of outstanding biodiversity value,	No	N/A	The sites are not declared as an area of outstanding biodiversity value or critical habitat,	N/A

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
critical habitat or environmental asset of intergenerational significance?			and do not contain an environmental asset of intergenerational significance.	
2. result in the clearing or modification of vegetation, including ecological communities and plant community types of conservation significance? ^	Yes	Low adverse	During the construction phase, 9,620m ² of native vegetation would potentially be cleared or modified. No mature or hollow-bearing trees are proposed to be removed. No TECs were recorded during the field investigation.	<p>Construction Phase</p> <ul style="list-style-type: none"> • A CEMP is to be prepared for the proposal. • Clearing of native vegetation/plants will be limited to the minimum required. • Development is not permitted (nor proposed) on pagoda formations. • Identify the limits of clearing; these will be provided to the construction contractor, identified both on site maps/plans and on-site through the erection of temporary fencing, bunting or similar. • Vegetation clearing (removal/modification) will be progressively staged to minimise the time disturbed soils are exposed. • Vegetation removal should be conducted with non-ground disturbing equipment. If machinery is used to clear/mulch vegetation it should be restricted to hard trail surfaces. • No mature or hollow-bearing trees are to be removed or indirectly disturbed. If high value trees are identified as a significant hazard due to changing conditions, assessments must be completed by a suitably qualified arborist and managed with input from an experienced ecologist. • All vehicles/machinery would enter the site via the existing trail network and stabilised access areas to prevent the introduction and spread of weed propagules and/or pathogens.

Is the proposed activity likely to...	Applicable?	Impact level	Reasons	Safeguards/mitigation measures
		(negligible; or low, medium or high adverse; or positive; or NA)	(describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	<ul style="list-style-type: none"> • Refrain from parking any vehicle/storing machinery near tree trunks. • Where possible, construction machinery should be washed prior to entering and leaving work sites to ensure weed propagules are not transported. • The proposed activity has the potential to introduce the plant pathogens <i>Phytophthora cinnamomi</i> and Myrtle Rust. Work must therefore avoid the potential spread of plant pathogens as far as possible, with contractors adhering to the following hygiene protocols: • Before entering and leaving the work site, workers are to remove excess soil and mud and then spray boots, tools, gloves and small equipment with recommended disinfectant supplied by the contractor (70% Methylated spirits / 30% Water) until runoff is clear. • Avoid unnecessary soil disturbance. • Inadvertent disturbed areas not part of the proposed scope of work will be permitted to naturally revegetate. <p>Operational Phase</p> <ul style="list-style-type: none"> • An Operational Management Plan is to be prepared for the proposal, addressing vegetation impacts including those identified below. • Visitor numbers will be managed and limited to 12 persons at each site per 24 hour period to reduce potential disturbance to fauna and vegetation. • Vehicle movements will be restricted to designated trails, with access limited to light vehicles or ATVs where practicable to minimise

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
				<p>track degradation, dust generation, and fauna disturbance.</p> <ul style="list-style-type: none"> Noise and activity levels will be kept low during nocturnal and dawn/dusk periods to minimise disruption to fauna. Visitors and staff will be briefed on environmental sensitivity of the site, including restrictions on off-trail movement and wildlife interaction. Waste will be managed according to 'leave no trace' principles, ensuring all waste is removed from site and no food scraps are left accessible to wildlife. Any lighting use will comply with relevant NPWS guidelines to avoid habitat impacts. Regular monitoring of vegetation around the camp sites would be conducted. Should weeds be detected a weed management plan would be prepared.
<p>3. endanger, displace or disturb terrestrial or aquatic fauna, including fauna of conservation significance, or create a barrier to their movement? ^</p>	<p>Yes</p>	<p>Low adverse</p>	<p>The field investigations recorded the following Matters of National Environmental Significance (MNES) listed under the EPBC Act within or close to the proposed activity area:</p> <ul style="list-style-type: none"> White-throated Needletail – listed as Vulnerable under this Act South-eastern Glossy Black-Cockatoo – Vulnerable Gang-gang Cockatoo – Endangered Pilotbird – Vulnerable Large-eared Pied Bat – Endangered. 	<ul style="list-style-type: none"> Any animals injured during the proposed activity would be collected and taken to a local veterinarian or wildlife carer for treatment Once rehabilitated, native animals must be released at their point of capture. It is expected injured exotic fauna would be ethically treated. Visitor numbers are to be managed to reduce potential disturbance to fauna and vegetation (e.g. restricting the number of guests per night and limiting group sizes on trails). Artificial lighting at night is to be minimised through the use of low-intensity, downward-facing, motion-sensor or red-spectrum lights to reduce light spill and nocturnal fauna disturbance.

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
			<p>No threatened ecological communities or flora species listed under the EPBC Act were recorded during the investigation.</p> <p>Assessments referencing the EPBC Act's Significant Impact Guidelines relevant to those recorded threatened species are provided at Attachment C confirming the proposed activity will not have a significant impact on the recorded MNES.</p> <p>The following threatened species listed on the BC Act were recorded in the vicinity of the proposed activity:</p> <p>Vulnerable listed species:</p> <ul style="list-style-type: none"> • Yellow-bellied Sheathtail Bat • White-throated Needletail • South-eastern Glossy Black-Cockatoo • Sooty Owl • Pilotbird • Scarlet Robin • Rosenberg's Goanna <p>Endangered listed species:</p> <ul style="list-style-type: none"> • Large-eared Pied Bat • Gang-gang Cockatoo • Giant Dragonfly. <p>Assessments drawing on the criteria provided under section 7.3 of the BC Act were undertaken on the each of these species that would rely on resources that may be removed by the proposed activity (Attachment C). The assessments concluded that the proposal would not have a</p>	<ul style="list-style-type: none"> • Vehicle movements are to be restricted to designated access tracks only, with access limited to light vehicles or ATVs where practicable to reduce dust, noise, and vegetation degradation. • Noise and activity levels should be minimised during dusk, night, and dawn periods to avoid disturbance to fauna. • Visitors and staff are to be briefed on the environmental sensitivity of the site, including restrictions on off-trail movement, wildlife interaction, and waste disposal. • All waste generated during operation (including food waste) must be removed from site and disposed of appropriately to prevent attraction of pest species and ensure compliance with NPWS waste policies. • No feeding or deliberate interaction with native fauna is permitted. • Regular inspections of vegetation and soil condition around the camp sites are to be undertaken to identify early signs of erosion, weed establishment, or trampling. • Any maintenance or minor works required during operation must comply with the same mitigation measures outlined for construction (e.g. pathogen hygiene protocols, vegetation protection). • Where lighting, noise, or access restrictions are not sufficient to prevent disturbance to sensitive fauna, adaptive management measures should be implemented in consultation with an ecologist or NPWS representative.

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
			significant effect on the threatened species, or their habitats. As such, the preparation of a SIS is not triggered.	
4. result in the removal of protected flora or plants or fungi of conservation significance? ^	No	N/A	Though considered and targeted, no threatened plants listed or currently being considered for listing, under the EPBC and/or BC Acts were recorded at any of the proposed bush camps or along the proposed access track to bush camp 2 where vegetation impacts are proposed (Lesryk 2025).	N/A
5. contribute to a key threatening process to biodiversity or ecological integrity?	Yes	Low adverse	<p>Of the Key Threatening Processes (KTP) listed under the EPBC, BC and/or FM Acts, those that are relevant to the proposal are identified below:</p> <ul style="list-style-type: none"> • Clearing of native vegetation (BC Act) • Removal of dead wood and trees (BC Act) • Infection of native plants by <i>Phytophthora cinnamomi</i> (BC Act) • Dieback caused by the root-rot fungus (<i>Phytophthora cinnamomi</i>) (EPBC Act) • Introduction and establishment of Exotic Rust Fungi of the order Pucciniales pathogenic on plants of the family Myrtaceae (Myrtle Rust) (BC Act) <p>Based on the proposed construction footprint, the proposed activity would require the removal or modification of up to 0.96 ha of native vegetation. Given the extent of similar resources within the study area and beyond, the loss and quality of</p>	<ul style="list-style-type: none"> • Follow <i>Hygiene guidelines</i> (State of NSW and DPIE 2020) and/or a hygiene management plan prepared as part of the proposal. • All vehicles/machinery must enter the site via the existing trail network and stabilised access areas to prevent the introduction and spread of weed propagules and/or pathogens. • Before entering and leaving the work site, workers are to remove excess soil and mud and then spray boots, tools, gloves and small equipment with recommended disinfectant supplied by the contractor (70% Methylated spirits / 30% Water) until runoff is clear. • Avoid unnecessary soil disturbance. • Dead wood/trees should be retained and relocated locally; the aim being to provide habitat for native species and their prey.

Is the proposed activity likely to...	Applicable?	Impact level	Reasons	Safeguards/mitigation measures
6. introduce weeds, pathogens, pest animals or genetically modified organisms into an area?	Yes	Low adverse	<p>this amount of native vegetation is not considered to significantly contribute to the <i>Clearing of native vegetation</i> KTP.</p> <p>Based on the adherence to the safeguards/mitigations measures, the proposal can proceed as planned without contributing to, or increasing the impact of, the KTPs identified above.</p> <p>The proposed activity would not intentionally introduce, or benefit the presence of noxious weeds, vermin or feral species, or genetically modified organisms to the local area.</p>	<ul style="list-style-type: none"> In addition to any safeguards/mitigation measures already provided above, the operational management plan will address monitoring and control of weeds or feral pests and any reporting requirements to NPWS.

9.3 Community impacts

Is the proposed activity likely to...	Applicable?	Impact level	Reasons	Safeguards/mitigation measures
1. affect community services or infrastructure?	No	N/A	N/A	N/A
2. affect sites important to the local or broader community for their recreational or	Yes	Long-term positive Short-term negative	Impacts from construction activities are not likely to be significant due to the infrequent use in this area of the park. Use of prefabricated structures will also minimise the time for on-site construction activities.	<ul style="list-style-type: none"> To facilitate public awareness and safety regarding work in progress, management structures (i.e., fencing and signage) would be installed to manage visitor access where necessary, and ensure safety.

Review of Environmental Factors: Wild Bush Luxury Bush Camps

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
other values or access to these sites?			Long-term benefits associated with the proposal would offer high-quality recreational experiences. The proposal supports diversification of park users by accommodating visitors who may not have camping equipment, require additional support, prefer a safer environment or who seek the benefits of a guided walk which provides educational and interpretive experiences. This will increase appreciation of the park's biodiversity, cultural heritage, and scenic values.	<ul style="list-style-type: none"> No work would be carried out on Sundays or during public holidays unless otherwise authorised by NPWS. Community updates will be provided via the NPWS website and appropriate channels.
3. affect economic factors, including employment, industry and property value?	Yes	Positive	The proposed activity will contribute to establishing a major new visitor destination in the greater Blue Mountains, contributing to one of the key management outcomes identified in the Gardens of Stone SCA Plan of Management. The anticipated increase in tourism to the region as a result of the proposal would increase employment opportunities and community benefits, both directly linked to the proposed Wild Bush Luxury bush camps and guided walking experience, and indirectly.	N/A
4. have an impact on the safety of the community?	Yes	Positive	The proposal will promote guided walking experiences which provide a safe and supported environment associated with the Pagoda Walk.	
5. cause a bushfire risk?	Yes	Low adverse	The proposed activity is unlikely to require works that increase the risk of fire ignition. The proposed activity is not considered to adversely impact the protection of people, the environment, or infrastructure and assets. The	<ul style="list-style-type: none"> Adequate fire control resources commensurate with work and risk (and fire-trained staff) should be available on-site. No work to be conducted during declared Total Fire Bans, unless approved by NPWS project manager.

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
			<p>proposal will not impede firefighter access or public evacuation operations.</p> <p>NPWS also routinely closes national parks estate during high and extreme fire danger rating periods, and this practice would continue.</p>	<ul style="list-style-type: none"> • Suspend all activities that may cause accidental ignitions (e.g. vegetation trittering, plant operations in rocky areas) in 'Extreme' or 'Catastrophic' Fire Danger Ratings. NPWS to risk assess the activities once the Fire Behaviour Index reaches 40 • Construction supervisor to check Fire Danger Rating daily before starting works and periodically during the day during fire season (1 October to 31 March) • All contractors will be required to have basic firefighting equipment (eg fire extinguisher etc) on site at all times.
<p>6. affect the visual or scenic landscape? ^</p>	<p>Yes</p>	<p>Medium adverse</p>	<p>The effect on the visual or scenic landscape has been considered in the Landscape Character and Visual Impact Assessment Report prepared by Environmental Partnership (see Attachment H). The report considered 16 viewpoints where bush camps could be potentially visible from existing tracks, lookouts, viewpoints and roads within the visual catchment. Of the 16 viewpoints considered, the impact on 14 of these viewpoints was considered negligible.</p> <p>The bush camps were considered to be visible from two viewpoints:</p> <ul style="list-style-type: none"> • From the connecting track from the Pagoda Walk to the bush camp 1 with impacts considered to be low-moderate as a result of design mitigations. • From a 4WD track in Wollemi National Park, east of Carne Creek to bush camp 2 with impacts considered to be moderate. This 	<ul style="list-style-type: none"> • Built form structures to be limited to 3500mm in height above ground level, with built structures limited to 300m2 (excluding connecting timber boardwalks) at each site. • Materials to be timber, canvas and Colorbond 'Gully' roofing, with colours to be sympathetic to the natural surroundings. • Any glass to be low reflectivity glass.

Review of Environmental Factors: Wild Bush Luxury Bush Camps

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
			<p>4WD track is intended to be closed by NPWS.</p> <p>Only two of the 16 viewpoints have potential for a visual impact by the bush camps (considered moderate), and these viewpoints are likely only experienced by those attending bush camp 1 or NPWS campground or by limited users of a 4WD track that is partly screened by existing vegetation and is also set for closure. Bush camp 2 will not be visible to independent walkers along the Gardens of Stone Pagoda Walk, nor will it be visible from visitor roads identified in the Gardens of Stone SCA vehicle access strategy. Combined with the intended material and colour choices and limited scale of the bush camps, and considering the limited impacts due to road improvements, the overall visual impact of the proposal can be considered as medium adverse. No additional planting is considered necessary due to the existing vegetation cover and anticipated growth, the limited locations where the camps are visible, and the lack of sensitive receptors.</p>	

9.4 Natural resource impacts

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. result in the degradation of the park or any other area reserved for conservation purposes?	Yes	Low adverse	The study area will undergo a low-impact transformation through the construction of structures on areas which have been previously modified. Structures will utilise existing trails for access and have been designed to be removed upon decommissioning.	<ul style="list-style-type: none"> • Waste Management and Minimisation <ul style="list-style-type: none"> ○ any surplus spoil and other materials would be disposed of appropriately at a licensed landfill facility. ○ Recycling methods will be enacted where applicable. ○ Personal rubbish is to be collected and deposited into a NPWS serviced bin. ○ Visual inspections of the site are to be made at the completion of the work to ensure no urban refuse remains.
2. affect the use of, or the community's ability to use, natural resources?	Yes	Medium term positive	Temporary, short-term disruptions may occur through the community's ability to use natural resources. However, the provision of high-quality accommodation increases the range of people who can access the natural resources present within the Gardens of Stone SCA.	N/A
3. involve the use, wastage, destruction or depletion of natural resources including water, fuels, timber or extractive materials? ^	Yes	Low	<p>Natural resources including fuel, water, timber, canvas and glass will be used during the construction of the proposal. Prefabricated designs for cabins, communal buildings and amenities will minimise potential on-site wastage.</p> <p>Water, gas and timber will be used during the operational phase.</p>	The Operational Management Plan is to address treatment of waste and methods to minimise gas and timber use during operational phases.
4. provide for the sustainable and	Yes	Low adverse	The camp is entirely off-grid, with no connection to mains power. The design prioritises passive and low-energy systems:	The Operational Management Plan is to address sustainable and efficient use of water and energy, including the methods for restricting water use.

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
efficient use of water and energy?			<ul style="list-style-type: none"> • All electrical demand is met through solar panels and battery storage • Energy use is restricted to essential services: lighting, refrigeration, water pumping, and wastewater system operation • No mechanical cooling or heating is provided in sleeping cabins • Cross-ventilation, shading, and thermal zoning reduce the need for powered systems • Gas (bottled) is used sparingly for hot water, cooking, and communal space heating only <p>The proposal minimises operational energy use and emissions.</p> <p>Water demand is kept to a minimum through minimising access to essential uses only with water allocated per person for handwashing, teeth cleaning and showering.</p>	

9.5 Aboriginal cultural heritage impacts

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. disturb the ground surface or any vegetation likely to contain culturally modified trees?	Yes	Negligible	<p>Ground surface disturbance will be required for road improvement works.</p> <p>No culturally modified trees have been identified in the vicinity of the proposed activity.</p> <p>No known artefacts or Aboriginal Cultural Heritage sites will be impacted as part of the proposed activity.</p>	<ul style="list-style-type: none"> • In the event unexpected Aboriginal cultural heritage (ACH) items are discovered during the course of the work, the work will cease within that area immediately and an archaeologist called to assess the find(s). Workers must contact the Project Manager to implement the NPWS unexpected finds procedure. • If ACH is identified, Heritage NSW must be notified. • Appropriate management and avoidance, or AHIP, should then be sought if Aboriginal objects are to be moved or harmed. • If human remains are found, the following will occur: <ul style="list-style-type: none"> ○ stop work ○ secure the site ○ notify the NSW Police and Heritage NSW.
2. affect or occur near known Aboriginal objects, Aboriginal places or an Aboriginal cultural asset of intergenerational significance? If so, can impacts be avoided? How?	No	N/A	N/A	N/A
3. affect areas: a. within 200 m of waters	Yes	Negligible	Some of the bush camps are located in proximity to water and occur within 200 m below or above a cliff face.	No further safeguards/mitigation measures than those already provided above are recommended.

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
b. within a sand dune system c. on a ridge top, ridge line or headland d. within 200 m below or above a cliff face e. in or within 20 m of a cave, rock shelter or a cave mouth? If so, can impacts be avoided? How?			The proposed bush camp sites were inspected by Kelleher Nightingale Consulting as part of the Aboriginal Heritage Assessment (December 2025) (Attachment B). Rock platforms were carefully inspected for rock engraving sites however none were identified. No culturally modified trees were found.	
4. affect wild resources which are used or valued by the Aboriginal community or affect access to these resources?	No	N/A	No wild resources, or access to such, would be impacted as a result of the proposal.	N/A
5. affect access to culturally important locations?	No	N/A	Access to culturally important locations would not be affected as a result of the proposed activity.	N/A

9.6 Other cultural heritage impacts

Is the proposed activity likely to...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. affect or occur near places, buildings or landscapes of heritage significance? ^	No	N/A	There are no non-Aboriginal heritage items within or close to the proposed activity area. None will be impacted directly or indirectly by the proposal (Attachment J).	<ul style="list-style-type: none"> • In the unlikely event that any significant non-Aboriginal [European] cultural heritage items are discovered during the work, a stop work protocol would be in place for unexpected finds. • All work in the area of the find would cease and a qualified archaeologist engaged to conduct an assessment. • Should the assessment identify the exposed remains as 'relics' as defined by the Heritage Act, Heritage NSW (currently part of NSW DCCEEW) would be notified in accordance with s.146 of the Heritage Act.
2. impact on relics or moveable heritage items, or an area with a high likelihood of containing relics? ^	No	N/A	There are no relics or moveable heritage items, or an area with a high likelihood of containing relics.	N/A
3. impact on vegetation of cultural landscape value (e.g. gardens and settings, introduced exotic species, or evidence of broader remnant land uses)?	No	N/A	There is no vegetation of cultural landscape value that will be impacted.	N/A

9.7 Impacts on matters of national environmental significance

Is the proposal likely to affect MNES, including:	Applicable?	Likely impact (negligible, low, medium or high adverse; or positive; or N/A)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. listed threatened species or ecological communities?	No	Low adverse	<p>The field investigations recorded the following Matters of National Environmental Significance (MNES) listed under the EPBC Act within or close to the proposed activity area:</p> <ul style="list-style-type: none"> • White-throated Needletail – listed as Vulnerable under this Act • South-eastern Glossy Black-Cockatoo – Vulnerable • Gang-gang Cockatoo – Endangered • Pilotbird – Vulnerable • Large-eared Pied Bat – Endangered. <p>No threatened ecological communities or flora species listed under the EPBC Act were recorded during the investigation.</p> <p>Assessments relevant to those recorded threatened species were conducted to determine whether the action has, will have, or is likely to have a significant impact on these MNES (Attachment C). The assessments concluded that the proposal would not have a significant impact on the recorded MNES. The proposal is therefore not a controlled action and will not require referral to the Federal Minister for the Environment and Water for further consideration or approval (Lesryk 2025).</p>	No further safeguards or mitigation measures than those already provided in Section 9 of this REF.
2. listed migratory species?	Yes	Negligible	There was one migratory bird species identified, the White-throated Needletail, which is listed as vulnerable under the EPBC and BC Acts. The	No further safeguards or mitigation measures than those already provided in Section 9 of this REF.

Review of Environmental Factors: Wild Bush Luxury Bush Camps

Is the proposal likely to affect MNES, including:	Applicable?	Likely impact (negligible, low, medium or high adverse; or positive; or N/A)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
			<p>species was identified flying overhead at bush camp 3 during targeted bird surveys.</p> <p>The proposed activity will result in the disturbance or modification of up to 0.96 ha of native vegetation; however, given the amount of similar resources retained within the study area and available in the surrounding locality, the proposed activity would not remove any resources uniquely relied upon by this species. As such, the proposed activity is not considered to disrupt the viability of any locally occurring White-throated Needletail populations such that they would lead to a long-term decrease in size. An Assessment of Significance considering impacts is provided at Attachment C.</p>	
3. the ecology of Ramsar wetlands?	No	N/A	No Ramsar wetlands are in close proximity to the proposed activity area.	N/A
4. world heritage values of World Heritage properties?	No	N/A	The SCA and activity area is not listed as part of a World Heritage property.	N/A
5. the national heritage values of national heritage places?	No	N/A	The SCA and activity area is not listed as a national heritage place.	N/A

9.8 Cumulative impacts

When considered with other projects, is the proposed activity likely to affect...	Applicable?	Impact level (negligible; or low, medium or high adverse; or positive; or NA)	Reasons (describe the type, nature and extent of impact, taking into account the receiving environment and proposed safeguards which will limit the impact)	Safeguards/mitigation measures
1. natural landscape or biodiversity values through cumulative impacts?	Yes	Low	A number of projects have been considered within the Gardens of Stone SCA and are directly related to this activity. These include the REFs for various sections of the Gardens of Stone Pagoda Walk. Clearing is required for the project, and it will result in increased visitation to the park.	These projects are all consistent with the vision and management outcomes identified within the Gardens of Stone SCA Plan of Management. REFs have been prepared for these projects identifying appropriate mitigation measures associated with potential impacts.
2. cultural (Aboriginal, shared and historic heritage) values through cumulative impacts?	No	N/A	No Aboriginal or historic heritage has been identified near or within the proposed activity area for the subject works. Aboriginal heritage assessments and historic heritage have been considered in the preparation of related REFs.	Mitigation measures include implementation of NPWS unexpected finds procedure if required.
3. social (amenity, recreation, education) values through cumulative impacts?	Yes	Positive	The proposal, combined with the Pagoda Walk REFs, provides for increased recreation opportunities for a diverse range of park users, including additional opportunities for education through greater accessibility to nature and guided walking experiences.	N/A
4. the community through cumulative impacts on any other part of environment (e.g. due to traffic, or waste generation)?	Yes	Low	The proposal is unlikely to significantly impact increased traffic or provide significant waste generation beyond that already considered as part of related Pagoda Walk REFs.	REFs have been prepared for these projects identifying appropriate mitigation measures associated with potential impacts.

10. Proposals needing more information

10.1 Lease or licence proposals under s 151 National Parks and Wildlife Act

10.1.1 Sustainability of the proposal

Under NPWS policy, activities where NPWS is the proponent for projects of the kind listed in section 151A NPW Act (which includes accommodation for visitor or tourist use), proponents must complete and submit a sustainability assessment together with the REF.

The sustainability of the proposal is addressed in Section 6.2.12 and Section 9 and a sustainability assessment considering built structures and facilities has been prepared (**Attachment F**).

10.1.2 Consultation requirements

Public consultation of the proposal is required under s151F NPW Act as the proposal authorises the erection of a new permanent building on the land.

Public consultation was undertaken in 2022 and again between 1 May and 26 June 2024 (see Attachment I) in relation to the proposed grant of a lease to Wild Bush Luxury to develop and operate three low-impact bush camps to support the guided multi-day walking experience, consistent with this proposal.

The most recent notice of the public consultation was:

- published in Sydney Morning Herald (1 May 2024), Daily Telegraph (1 May 2024) and Lithgow Mercury (3 May 2024) as well as on the Environment and Heritage website (1 May 2024)
- published in Sydney Morning Herald (29 May 2024), Daily Telegraph (29 May 2024) and Lithgow Mercury (31 May 2024) as well as on the Environment and Heritage website (29 May 2024) for the purpose of providing additional information about the location of the centre of the bush camps zones in which the proposed bush camps are proposed to be located.

Specific environmental concerns raised included potential impacts to pagoda landscapes, visual impacts and wastewater contamination in Carne Creek. In response, NPWS committed to preparing the visual impact assessment and wastewater assessment which are attached to this REF.

Should this REF be positively determined, the proposed lease will be referred to the NPWS Advisory Council under s151G NPW Act as the proposed lease authorises the erection of a new structure on the land and is for a term that exceeds 10 years including options to renew.

11. Summary of impacts and conclusions

Table 16 provides an overview of the significant impacts considering environmental issues.

Table 16. Consideration of significance of impacts for each environmental factor

Environmental factor	Consideration	Significance of impact*
1. the environmental impact on the community	Social, economic and cultural impacts as described in sections 9.3, 9.5 and 9.6.	Not significant
2. the transformation of the locality	Human and non-human environment as described in sections 9.1, 9.2 and 9.4.	Not significant
3. the environmental impact on the ecosystems of the locality	Amount of clearing, loss of ecological integrity, habitat connectivity/fragmentation and changes to hydrology (both surface and groundwater) as described in sections 9.1, 9.2 and 9.4 and, for nationally listed threatened ecological communities, in section 9.7.	Not significant
4. reduction of the aesthetic, recreational, scientific or other environmental quality or value of the locality	Visual, recreational, scientific and other impacts as described in section 9.3.	Not significant
5. the effects on any locality, place or building that has— a. aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance, or b. other special value for present or future generations	Impacts to Aboriginal and historic heritage associated with a locality (including intangible cultural significance), architectural heritage, social/community values and identity, scenic values and others, as described in sections 9.3, 9.5 and 9.6 and (for MNES heritage places) section 9.7.	Not significant
6. the impact on the habitat of protected animals, within the meaning of the Biodiversity Conservation Act	Impacts to all native terrestrial species, including but not limited to threatened species, and their habitat requirements, as described in section 9.2.	Not significant
7. the endangering of a species of animal, plant or other form of life, whether living on land, in water or in the air	Impacts to all listed terrestrial and aquatic species, and whether the proposal increases the impact of key threatening processes, as described in section 9.2.	Not significant
8. long-term effects on the environment	Long-term residual impacts to ecological, social and economic values as described in all parts of section 9.	Not significant
9. degradation of the quality of the environment	Ongoing residual impacts to ecological, social and economic as described in section 9.4.	Not significant
10. risk to the safety of the environment	Impacts to public and work health and safety, from contamination, bushfires, sea level rise, flood, storm surge, wind speeds, extreme heat, rockfall and landslip, and other risks likely to increase due to climate change as described in sections 9.1, 9.3 and 9.4.	Not significant

Environmental factor	Consideration	Significance of impact*
11. reduction in the range of beneficial uses of the environment	Impacts to natural resources, community resources and existing uses as described in sections 9.3 and 9.4.	Not significant
12. pollution of the environment	Impacts due to air pollution (including odours and greenhouse gases); water pollution (water quality health); soil contamination; noise and vibration (including consideration of sensitive receptors); or light pollution, as described in sections 9.1 and 9.3.	Not significant
13. environmental problems associated with the disposal of waste	Transportation, disposal and contamination impacts as described in section 9.3.	Not significant
14. increased demands on natural or other resources that are, or are likely to become, in short supply	Impacts to land, soil, water, gravel, minerals and energy supply as described in section 9.4.	Not significant
15. the cumulative environmental effect with other existing or likely future activities	The negative synergisms with existing development or future activities as considered in section 9.8.	Not significant
16. the impact on coastal processes and coastal hazards, including those under projected climate change conditions	Impacts arising from the proposed activity on coastal processes, and impacts on the proposed activity from those coastal processes and hazards, both current and future, as considered in section 9.1.	Not significant
17. applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1	Inconsistency with the objectives, policies and actions identified in local, district and regional plans, as considered in section 3.2.2.	Not significant
18. other relevant environmental factors.	Any other factors relevant in assessing impacts on the environment to the fullest extent, such as native title.	Not significant

In conclusion:

- There **is not** likely to be a significant effect on the environment and an environmental impact statement **is not** required

Reason(s): The proposed activity is proposed in the Gardens of Stone SCA, in areas already disturbed with existing access via service vehicle trails. The proposed activity includes a total construction footprint including access roads of 9,620m². The proposal includes minimal built form and does not impact any threatened ecological community and will not result in any significant loss of vegetation that would support species diversity. The proposal will not have a significant impact on the environment that would require an environmental impact statement.

- There **is not** likely to be a significant effect on threatened species, populations, ecological communities or their habitats and a species impact statement **is not** required

Reason(s): The sites of the bush camps and road improvement works are not located in areas with threatened ecological communities and will not adversely impact threatened species.

Assessments relevant to those recorded threatened species are provided at Attachment C, concluding that the proposal would not have a significant effect on the threatened species, or their habitats. As such, the preparation of a species impact statement is not triggered.

- The proposed activity **is not** likely to have a significant impact on matters of national environmental significance listed under the EPBC Act and so **will not** require referral to the Australian Government.

Reason(s): The field investigations recorded the following Matters of National Environmental Significance (MNES) listed under the EPBC Act within or close to the proposed activity area:

- White-throated Needletail – listed as Vulnerable under this Act
- South-eastern Glossy Black-Cockatoo – Vulnerable
- Gang-gang Cockatoo – Endangered
- Pilotbird – Vulnerable
- Large-eared Pied Bat – Endangered.

No threatened ecological communities or flora species listed under the EPBC Act were recorded during the investigation.

Assessments relevant to those recorded threatened species, were conducted to determine whether the action has, will have, or is likely to have a significant impact on these MNES (Attachment C). The assessments concluded that the proposal would not have a significant impact on the recorded MNES. The proposal is therefore not a controlled action and will not require referral to the Federal Minister for the Environment and Water for further consideration or approval (Lesryk 2025).

- The proposed activity **will** require certification to the Building Code of Australia, Disability (Access to Premises – Buildings) Standards 2010 or Australian Standards in accordance with the NPWS [Construction Assessment Procedures](#)

Reason(s): The proposal includes new building works that have been designed by an architect and informed by engineering advice. Certification by an appropriately qualified person will be required for the structures and services to ensure they have been designed, built and operated in accordance with technical standards.

12. Supporting documentation

Please provide details of documentation included with this application.

Table 17. Documents that accompany the review of environmental factors

	Document title	Author	Date
A	Gardens of Stone Pagoda Walk Bush Camp Response	Ingrid Donald Architects	October 2025
B	Gardens of Stone State Conservation Area Aboriginal Heritage Assessment	Kelleher Nightingale Consulting Pty Ltd	December 2025
C	Ecological Assessment Report Wild Bush Luxury Bush Camps	Lesryk Environmental Pty Ltd	November 2025

D	Native Title Claimants Response to Future Acts Notification	Warrabinga Native Title Claimants Aboriginal Corporation	1 September 2025
E	Site suitability assessment	NPWS	November 2025
F	Sustainability Assessment for built facilities and structures	Ingrid Donald Architects	10 October 2025
G	Report on Investigations and Assessments for the Siting of Proposed Effluent Management Systems at Gardens of Stone State Conservation Area – Bush Camp Zones 1–3	Blue Mountains Geological and Environmental Services	October 2025
H	Wild Bush Luxury Bush Camp Proposal Landscape Character and Visual Impact Assessment Report	Environmental Partnership	October 2025
I	Gardens of Stone Multi-Day Walk Proposal to grant a lease	NPWS	2024
J	Historic Heritage Information Management Systems (HHIMS) records	NPWS	2025
K	Aboriginal Heritage Information Management System (AHIMS) records	NPWS	2025

13. Fees for external proponents


Not relevant – internal proponent.

14. Declarations

As the person responsible for the **preparation** of the REF, I certify that, to the best of my knowledge, this REF is in accordance with the EP&A Act, the EP&A Regs and the Guidelines approved under section 170 of the EP&A Regs, and the information it contains is neither false nor misleading.

Signature	
Name (printed)	Kerrie Symonds
Position	Director, Ecoplan Projects Pty Ltd
Date	January 9, 2026

By endorsing the REF, the proponent confirms that the information in the REF is accurate and adequate to ensure that all potential impacts of the activity can be identified.

Signature	
Name (printed)	Soren Mortensen
Position	Principal Project Officer – Blue Mountain Branch, NPWS
Date	January 9, 2026

Seal (if signing under seal):

Next steps

Submit the signed REF to the relevant NPWS Area Office, requesting determination of the REF and advice on when approval for the works may be forthcoming.

15. References

Blue Mountains Geological and Environmental Services, October 2025, *Report on Investigations and Assessments for the Siting of Proposed Effluent Management Systems at Gardens of Stone State Conservation Area – Bush Camp Zones 1–3*

Department of Environment and Heritage, State Heritage Inventory - <https://www.environment.nsw.gov.au/topics/heritage/search-heritage-databases/state-heritage-inventory>, viewed 22 October 2025

Department of Planning and Environment, 2022, *Central West and Orana Regional Plan 2041*

Department of Planning and Environment, 2022, *Gardens of Stone State Conservation Area Plan of Management*

Department of Climate Change, Energy, the Environment and Water, Nov 2024, *Gardens of Stone State Conservation Area Vehicle access strategy*

Department of Climate Change, Energy, the Environment and Water, Apr 2025, *Gardens of Stone State Conservation Area Visitor infrastructure master plan*

Environmental Partnership, October 2025, *Wild Bush Luxury Bush Camp Proposal Landscape Character and Visual Impact Assessment Report*

Ingrid Donald Architects, 2025, *Sustainability Assessment for built facilities and structures*

Ingrid Donald Architects, 2025, *Gardens of Stone Pagoda Walk Bush Camp Response*

Kelleher Nightingale Consulting Pty Ltd, December 2025, *Gardens of Stone State Conservation Area Aboriginal Heritage Assessment*

Lesryk Environmental Pty Ltd, 2025, *Ecological Assessment Report Wild Bush Luxury Bush Camps*

Lithgow City Council 2020, *Lithgow 2040 Local Strategic Planning Statement*,

NPWS, 2024, *Gardens of Stone Multi-Day Walk Proposal to grant a lease*

NPWS, November 2025, *Site suitability assessment*

NPWS, Apr 2025, *Review of Environmental Factors: Gardens of Stone Pagoda Walk – Sections Two and Three*

NSW Reconstruction Authority (RA) 2024, *State Disaster Mitigation Plan 2024-2026*.

