



# Blue Mountains Conservation Society Inc

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## Nature Conservation Saves for Tomorrow

26 February 2026

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To Whom it may concern

### **Gardens of Stone State Conservation Area bush camps draft review of environmental factors: public consultation**

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with over 900 members. Its mission is to protect, conserve and advocate for the natural environment of the Greater Blue Mountains Area (GBMA) and associated protected natural areas.

The Society has reviewed the *draft Review of Environmental Factors (REF) for the Wild Bush Luxury Bush camps and supporting infrastructure* (Gardens of Stone State Conservation Area) and believes that the REF has failed to adequately identify and address the potential environmental impacts of the proposal. If approved, this proposal for private accommodation in prominent positions among an internationally significant pagoda landscape would be a damaging precedent for all NSW national parks. As well, the condition of the locations has been inaccurately described in applying the sustainability criteria for visitor use. Further, there is a conflict of interest arising from the role of national parks and Wildlife Service as both the proponent of the proposed private accommodation and the decision-maker.

The Society's view is that three accommodation hubs and associated infrastructure should not proceed. We have summarised our recommendations below and provided further details in the body of this submission.

#### **Summary**

We have addressed the following issues in our submission:

1. Biodiversity assessment
2. Application of Sustainable Assessment criteria for visitor use and tourism in NSW national parks
3. Recreation and public interest values
4. The claim of degradation/modification of the three sites that the bush camps are proposed to be built on and evidence against this claim.

- a. Physical character
- b. Landscape values
5. Recreational values
6. Water run-off from the buildings and potential for pollution
7. Helipad
8. Weed management and the plantings related to the Ecomax.

**Recommendations:**

- The Society is of the view that public interest would be much better served by refusing this leasing arrangement and encouraging small businesses to provide supported camping in the public camping area.
- The Society does not agree that the specific areas proposed for the three accommodation hubs are heavily degraded; in fact, they appear largely undisturbed. The Society is of the view that sites should remain undeveloped and in their natural, unmodified state.
- The materials proposed for use need to be investigated to ensure they will not leach any hazardous, toxic or pH changing chemicals into the environment including run-off into ephemeral creeks.
- Details of the construction of the helipad need to also be provided and allow for public comment.
- Use of foreign material needs to be carefully screened to ensure it has no pathogens or weed seeds. Only local indigenous grass species are to be considered for planting on the soil mounds.
- Biodiversity assessment – it is critical that the species of plants present in the bush camps and walking tracks is re-assessed, given that endangered species of Banksia and Isopogon have been located in the area, and that plans are devised to prevent any removal or damage to those species. A further analysis of data from the Atlas of Living Australia should be conducted to ensure a more complete dataset.
- Considering the contents of the Sustainable assessment criteria for visitor use and tourism in NSW national parks, this draft proposal for the three accommodation sites should be scrapped and funds allocated to improving the public campground instead.

On the following pages 3-9 the Society has provided further details on each of the points listed above. Thank you for the opportunity to comment on this draft Review of Environmental Factors.

Yours sincerely,



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## 1. Biodiversity assessment

This assessment as reported in the Ecological Assessment Report November 2025 was adequate in many respects including use of both State<sup>1</sup> level and Federal<sup>2</sup> data sources for flora and faunal species. However, it is important to realise that many citizens and researchers who collect and record information do so on other platforms such as iNaturalist, eBird or Birddata. The Atlas of Living Australia (ALA) incorporates data from all these sources in addition to BioNet and is therefore a much more complete data set. Hence, it is worthwhile ecological consulting organisations also refer to the records contained in ALA for a more complete view.

The Society notes that some researchers do not record findings on any of these sites but publish their research elsewhere and so may only be found via a thorough literature search.

The ecological assessment further included information obtained from infrared camera traps, sound recordings of calls, daytime and nocturnal surveys. The inclusion of sound recordings and camera trap surveys increased the amount of data collected which is commendable. However, there are inadequacies in the design of the field surveys.

The Gardens of Stone Conservation Area, as for most parts of the Sydney Basin Bioregion, experiences considerable change in weather conditions across the course of 12 months and from year-to-year. The vegetation flowers at certain times of the year (this includes mass eucalypt flowering events) and this will influence life cycles and presence of fauna. For example, many bird species will move into and out of areas of native vegetation, including heathland and woodlands, depending on the flowering of plants and hence the availability of both nectar and insects. The availability of food also impacts birds' (and other fauna's) nesting behaviours. Raptors such as the Brown Goshawk, respond to movement of small bird species across the seasons.

Conducting **all** field surveys during February alone greatly restricts the ability of the researchers to collect the necessary data demonstrating in depth how the fauna uses the area designated for the bush camps. For example, this only poorly captures the breeding of birds that happens during other months, nor those that move into the area at different times of the year. Whilst it is possible to locate old nests in trees, it can be extremely difficult to accurately identify the species of bird that built the nest.

Additionally, the field surveys conducted were extremely limited in their design and implementation. For example, on page 24 of the Ecological Assessment Report, it states that dedicated bird surveys of 20 min were performed by two researchers on two days in February at three different times of the day across the whole of the three bush camps. The researchers stood in the same location in each site survey. In other words, for each site there was 40 mins of surveying on two days in February.

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<sup>1</sup> BioNet Atlas databases (Cth DCCEEW 2025a, NSW DCCEEW 2025a)

<sup>2</sup> Australian Government's Protected Matters Search Tool (PMST)

**One** nocturnal faunal survey was conducted at each site on different days, and it lasted from half an hour before last light to about one hour following that. Again, this is inadequate to ensure that all nocturnal fauna has been located.

Acoustic recording conducted during the survey period would have assisted identify species that call from just prior to dawn to just after dusk, and would have helped identify diurnal and crepuscular species present in the applicable days in February 2025. It may not have identified all nocturnal species who may have called later in the night.

The report also states that field investigations lasted for approximately 60 person hours to assess all flora and fauna surveys. Whilst it might give a sample of biodiversity present in February, this will not be sufficiently comprehensive to reliably determine biodiversity across the entire year, or from year-to-year.

The consultant has acknowledged there are limitations in the data collected, and it is restricted to the time and date the data was collected (see report<sup>3</sup>). It is completely inadequate to limit any faunal survey to just one month of a year.

The Ecological Assessment Report also identified errors in the NSW State Vegetation Type Map with some plant communities being misidentified.

### ***Banksia penicillata***

In the Executive Summary Background (page viii) of the Ecological Assessment Report, it is asserted that:

“Within the three areas surveyed, no state or nationally listed threatened plants or ecological communities were recorded. No threatened plants were considered to be present within the soil seed bank.”

The researchers conducting the ecological assessment located individual specimens of *Banksia penicillata* in Bush camp 3. They found 45 specimens in the woodland and 40 in the heath.

On 5 December, 2025, this species was declared an endangered species by the NSW Office of Environment and Heritage<sup>4</sup> - it was not listed as endangered at the time the ecological assessment was performed in February 2025.

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<sup>3</sup> Page 31 Ecological Assessment Report: “This report is based upon data acquired from the current investigations; however, it should be recognised that the data gathered is indicative of the environmental conditions of the site at the time the field work was conducted.”

<sup>4</sup>

<https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/banksia-penicillata>

Quotes from the 2025 Notice of and reasons for the Final Determination (NSW Threatened Species Scientific Committee) states in relation to *Banksia penicillata*<sup>5</sup>:

“ 2) it is known from 2–5 threat-defined locations; 3) there are likely to be extreme fluctuations in the number of mature individuals; and 4) continuing decline is inferred and observed in the area of occupancy; area, extent and quality of habitat; number of populations; and number of mature individuals due to adverse fire regimes (particularly high frequency fire) and drought.” (page 1)

*Banksia penicillata* is endemic to the Blue Mountains, with a very restricted range which includes the Gardens of Stone State Conservation Area (GOS SCA). It was highly adversely affected by the 2019-2020 fires which killed a large number of old plants in the SCA (Ian Baird 2025 pers comm). *B. penicillata* is an obligate seeder.

Given that the plant has been granted “endangered” status, it is necessary to ensure that there is no clearing of or damage to, any individual plant of this species in any of the bush camps or along the proposed walking tracks between the camps. There must be an urgent emphasis on locating and marking every plant in the areas proposed where the camps and trails are proposed to ensure that they are not disturbed.

*Banksia* species are extremely susceptible to *Phytophthora cinnamoni*. In particular, *B. penicillata* is stated to be susceptible to *Phytophthora cinnamoni*. Building paths, roadways and any other built infrastructure that encourage the human and vehicular traffic that spreads *Phytophthora cinnamoni* should be located well away from *B. penicillata* specimens.

The safest approach is to not build a bush camp with all its buildings and boardwalks, in this area.

### ***Isopogon prostratus***

A preliminary determination has also been made to list *I. prostratus* as an endangered plant species in NSW<sup>6</sup>. This was noted in the Ecological Assessment Report as a footnote. It is interesting to note there is a possibility of confusion between *I. prostratus* and *I. anemonifolius* as detailed on page 2 of the Conservation Assessment for *I. prostratus*. Although the researchers did not locate *I. prostratus*, they did find *I. anemonifolius* in habitat suitable for *I. prostratus*. Hence, the identity of the individual plants located should be checked and reasons given for the researchers determination of species identity.

*Isopogon prostratus* is not restricted to rock plate heath, but occurs quite happily in woodland, open forest and transitional areas as well (Ian Baird, pers comm Feb 2026). It is likely to occur along the proposed walking tracks and possibly in the campsites.

The reasons for the nomination of *I. prostratus* as Endangered are listed in the preliminary determination, as per the extract:

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<sup>5</sup>

<https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/banksia-penicillata>

<sup>6</sup> <https://www.environment.nsw.gov.au/sites/default/files/2025-08/isopogon-prostrates-conservation-assessment.pdf>

“The main reasons for this species being eligible are: (1) it has a highly restricted geographic distribution with an area of occupancy of 384 km<sup>2</sup>; (2) it is considered to be severely fragmented; and (3) continuing decline in the number of mature individuals and the area, extent and quality of habitat is estimated due to habitat clearing, fragmentation and degradation, and inferred due to adverse fire regimes (particularly high frequency fire, low frequency fire, high intensity fire, and changes in fire season) and *Phytophthora cinnamomi*. In Conservation Assessment for *I. prostratus* 2025.”

## 2. Significance of the pagoda landscape is recognised in the Gardens of Stone SCA plan of management

The areas for the proposed three accommodation structures are ‘near pristine’ areas largely on rock and include pagoda rock formations which are part of the distinctive “pagoda landscape” of the Gardens of Stone State Conservation Area (GOS SCA).

The GOS SCA Plan of Management<sup>7</sup> states that the SCA is:

“...an area of outstanding natural and cultural value. It protects ancient sandstone pagodas, rich eucalyptus forests, an array of threatened species ...”

Under the heading “Significance of Gardens of Stone State Conservation Area” (page 3), the plan states:

**“Nationally 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.” They further state that these are a “nationally significant landscape” and that “the platy pagodas which are considered rare on a global scale.”

The Plan of Management (page 3) goes on to acknowledge the area’s rich biodiversity, resulting from the complex rocky landforms or the upland plateau, which provide a diversity of habitats.

The first object of the National Parks and Wildlife Act (1974)<sup>8</sup> is:

“the conservation of nature, including habitat, ecosystems and ecosystem processes, biological diversity...and landforms of significance, including geological features.. and landscapes and natural features of significance...”. [NPW Act, s.2A]

The proposal for the establishment of accommodation hubs on the pagoda landscape is not consistent with this.

The proposal also introduces three separate accommodation areas into natural areas of the SCA thus creating three new private inholdings. This is contrary to park management practices. It completely contradicts NPWS’ Establishment Plan which prioritises acquiring

<sup>7</sup> <https://www.environment.nsw.gov.au/publications/gardens-stone-state-conservation-area-plan-management>

<sup>8</sup> <https://legislation.nsw.gov.au/view/html/inforce/current/act-1974-080>

private inholdings to improve park management and integrity of reserves. These “inholdings” would be essentially permanent. Inholdings weaken the natural environment and can lead to the introduction of invasive species. NPWS’ Establishment Plan states that “Priorities for DECC public reserves over the next 10 years” (p.20) includes “acquiring inholdings (areas of private or Crown land embedded within a reserve) ...” to improve effective and efficient management of existing reserves.

### **3. Application of Sustainable Assessment criteria for visitor use and tourism in NSW national parks**

The assessment in the draft REF does not successfully justify the proposal to locate three separate accommodation hubs with structures and supporting infrastructure in bushland locations which have only been minimally impacted by human activities. The sites have been selected in conjunction with the operator who requires natural locations to sell their luxury accommodation and activities. This objective is at odds with the Sustainability guidelines for visitor use and tourism in NSW National Parks<sup>9</sup> which is intended to guide infrastructure to locations where it will have low impact and which are preferably modified with existing structures.

The proposal will place infrastructure in three separate locations where there is no existing infrastructure. Introducing this would be a major change with long-lasting impacts to these three areas as currently they are low impact areas with no infrastructure. There will suddenly be increased visitor numbers, infrastructure, access vehicles, helicopters concentrated at these three sites. This proposal will initiate and facilitate what the guidelines calls “creep” from a natural setting to an increasing human footprint, activities and needs<sup>10</sup>. The guideline seeks to avoid this by using already modified areas (refer to Table 1 page 11-12 of Sustainability guidelines).

There is the further danger that if this proposal is approved, the operator or its successors will seek to expand the sites and add to infrastructure. Modified development consent processes are usually less rigorous than gaining the original approval. Tourism numbers in the GBMA continue to climb as happens in many natural areas and there were more than 4.3 million visitors<sup>11</sup> in 2024 to the Blue Mountains National Park. Popular sites can quickly be overwhelmed by hugely bigger visitor numbers encouraged through social media, as we see in Australia and the world.

The Sustainability guidelines says that proposals should be built with form and scale to blend

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<https://www.environment.nsw.gov.au/publications/sustainability-guidelines-visitor-use-and-tourism-nsw-national-parks>

<sup>10</sup> “Given the over-riding requirement for the protection of conservation values, there must be an emphasis on ensuring that proposals (either on their own or cumulatively) do not result in the inadvertent ‘creep’ or ‘drift’ of a park setting from its current natural and cultural heritage condition towards a more modified state.” Page 8 Sustainability assessment criteria for visitor use and tourism in New South Wales national parks.

<https://www.environment.nsw.gov.au/sites/default/files/sustainability-assessment-criteria-visitor-use-tourism-national-parks-110016.pdf>

<sup>11</sup> <https://camperchamp.com.au/national-parks-statistics/blue-mountains/>

into the existing site. Although the REF details an attempt to create and utilise architecture using materials more sympathetic to the environment, the bush camps will be a series of cabins strung out across the area and with water tanks and related facilities.

The “Sustainability assessment criteria visitor use tourism national parks”<sup>12</sup> says under **Appendix A - Determining site suitability** “ that all tourism and visitor use within the national parks system should be developed to be compatible with the role of protecting conservation values.” (p.8). This same guide also states on page 8 that “fire trails” are an example of “only small indications of human impact”. This determination (that fire trails are a small indication of human impact) applies to all three proposed bush camps (see Ecological Assessment Report Attachment 6 page 32 and photographs in Appendix B). However, in the draft REF it is claimed that it all sites proposed for bush camps are significantly degraded.

Despite an acknowledgement in the REF of the high level of biodiversity in the pagoda landscapes, both the REF and the Environmental Assessment Report fail to recognise the relevance of the pagoda landscape to the plants and animals that live there. The endemic fauna such as snakes and lizards need both the actual pagoda formations for shelter and the slope surrounding them for foraging.

#### **4. Recreation and public interest values**

The Society does not support the NPWS’ view that the proposed activity is within the public interest.

The Society is of the view that it is not in the public interest to lease public land in the recently declared GOS SCA for private companies to make substantial profit at the public’s expense, to be developing accommodation nodes that detract from the public’s enjoyment of the landscape by blighting the view, excluding the public from access to parts of the park, possibly clearing endangered plant species and potentially polluting pristine parts of the park for at least the next 20 years. It is not in the public interest to then require public funds to be spent in cleaning up any mess and removing these structures at some point in the future when they are no longer considered to be desirable and (potentially) if the company involved fails to do so.

The public interest would be much better served by refusing this leasing arrangement and encouraging small businesses to provide supported camping in the public camping area.

#### **5. The claim of degradation/modification of the three sites that the bush camps are proposed to be built on and evidence against this claim.**

Throughout the REF and the other attachments, there are frequent references to the Gardens of Stone SCA and the bush camp sites as “degraded” and “heavily modified”.

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<sup>12</sup>

<https://www.environment.nsw.gov.au/sites/default/files/sustainability-assessment-criteria-visitor-use-tourism-national-parks-110016.pdf>

**The REF states (page 44):**

**“7.4.1 Site character<sup>13</sup>**

**a. Physical Character**

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.”

The Society agrees that overall, there are many parts of the GOS SCA landscape that are considerably degraded and modified. As stated in the various attachments and the REF, this has been caused largely by 4WD vehicles, motorbikes, mining and forestry operations, including logging. The Society is further aware that the NPWS is rehabilitating the park (including weed management and revegetation), restricting 4WD vehicles and restoring roads and improving camping facilities. We congratulate the Service for leadership in these areas.

However, the Society cannot agree that the areas proposed for the three bush camps are heavily degraded or heavily modified; in fact, they appear largely undisturbed.

On Page 13 of the Ecological Assessment Report<sup>14</sup>, Lesryk Environmental Pty Ltd record:

**b. Landscape values**

**Existing environment**

**4.2.1**

Page 13:

“The Bush Camps are primarily located within natural rock outcrops with patches of shrubland, surrounded by a low canopy sclerophyll forest.”

As detailed in the Site Suitability Assessment (Ecological Assessment Report Attachment 6):

“the proposed Bush Camps are located within a landscape that has been shaped by a long history of logging, mining, and recreation, resulting in a largely modified environment interspersed with pockets of natural bushland and striking sandstone formations. Despite past disturbance, these areas retain strong scenic and cultural values, with natural features such as pagodas and escarpments remaining visually dominant.”

Note the emphasis in the above paragraph that whilst the environment of the “landscape” is

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<sup>13</sup> Page 44 Review of Environmental Factors found at <https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-management/community-engagement/walking-tracks-and-trails-in-national-parks/gardens-of-stone-state-conservation-area/bush-camps-draft-review-environmental-factors-consultation>

<sup>14</sup>

<https://www.environment.nsw.gov.au/sites/default/files/2026-01/gardens-of-stone-sca-pagoda-walk-bush-camps-ref-attachment-c-ecological-assessment.pdf>

modified, it is interspersed with “pockets of natural bushland”.

For reference, a photographic record of the areas investigated has been provided in the Appendix B of the Ecological Assessment Report. These photographs show bushland, rock formations/outcrops, heath, and the parts of the existing road in Bush Camp 3. Apart from the road, there are no areas of degradation included in these photographs.

The ecological assessment also found that the clearing of the fire trails was overestimated in the REF, and are 3.5m wide, not between 10 and 18 m wide; this may have assisted in the proponents overestimating the degradation of these two sites (see page 32 of Ecological Assessment Report).

In the Society’s view, it is this largely unmodified natural bushland which NPWS is now proposing to damage by building these three bush camps and associated walking tracks. Images from Google Earth Pro do not show a large amount of heavy degradation in the proposed bush camp sites, beyond the old roads.

Further, the Society does not understand the rationale for further disturbing or degrading intact areas of the GOS SCA, nor removing the sense of “untouched landscapes” when such areas should receive the highest level of protection possible.

Maintaining the current condition of the natural pagoda landscapes, which are recognised to be both nationally and internationally significant, is absolutely in the public interest and is crucial for the NPWS to fulfil its primary role of conservation of nature.

## **5. Recreational value**

The activities that are listed on Page 60 of the draft REF<sup>15</sup> are available to all without needing construction of these accommodation hubs. People can be supported through assisted camping provided under the supported camping in National Parks arrangement. Additionally, there are local businesses that can be contracted to set up campsites in public campgrounds (including in National Parks) and support walkers so that they don’t have to carry heavy packs and to provide equipment that these people don’t have.

The walking tracks that are part of this 3-day walk do not require a high degree of physical ability nor are they difficult to find. Another way to support the walkers is to drop them off at the beginning of each day’s walk and then pick them up at the end. A guide could support them. The walkers can then stay in accommodation in Lithgow each night. This model is used in other states of Australia (e.g. WA) and works well. It provides economic advancement for local accommodation and tour organisations, while looking after the natural environment.

## **6. Water run-off from the buildings and potential for pollution**

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<sup>15</sup> “The park is valued for bushwalking, sightseeing, picnicking, and nature-based exploration, supported by its sandstone pagoda formations, cliffs, valleys, and escarpments.” In draft REF page 60.

- a. **Canvas wraps.** The building plans state that “a canvas wrap and roof that envelopes the form”<sup>16</sup> is installed to assist visual amenity and as an awning to provide shade for the guests. Industrial canvas is usually waterproofed to ensure improved function and to extend its life. The building plans do not state what type of waterproofing this may be, but a common waterproofing for industrial canvas for tents includes the use of polyurethane (PU). Polyurethane breaks down over 5 – 15 years, depending on exposure to sunlight, rain and to mildew. Hydrolysis degrades the PU coating over time, and subsequently chemicals hazardous to microbes and larger organisms can leach into the environment. Some canvas treatments include “forever chemicals.”<sup>17</sup> Given the recent, well-publicised concerns about PFAS in the Blue Mountains and plastic pollution elsewhere in the Australian environment, it is inconceivable that consideration is given into approving structures that are likely to leak such chemicals into the Gardens of Stone environment.
  
- b. **Metal roofing structures leak chemicals into the environment.** This pollution comes from the roof components, which include the fixing materials as well as the metal roof itself. Colorbond roofing (which is to be used in this development) degrades over time and then leakage increases. Research into heavy metal pollutants into the environment from roofing structures “underscores the importance of selecting appropriate roofing materials, regular maintenance, and at source treatment to limit the amount of pollutants generated over the roof’s lifetime.”<sup>18</sup>
  
- c. **Concrete structures.** The septic tanks for collection of greywater could be either polyethylene or concrete. Both have the potential to decompose over time and release chemicals. It is well-established that concrete leachate changes the pH of the soil and makes it more alkaline. This raised pH affects the growth of acid-loving plants which find a higher pH unsuitable and promotes the growth of some weeds.

It is unacceptable that such pollution is being approved by NPWS in a remote, near pristine environment.

**Ephemeral drainage lines** are shown in Figure 6<sup>19</sup> on page 18 of the Ecological Assessment Report. These figures clearly show that these drainage lines run from the accommodation hubs at “Bush Camp 2” and “Bush Camp 1” into Carne Creek.

Ephemeral drainage is known to be an important source of groundwater recharge<sup>20</sup> so it is crucial that these drainage lines are not disturbed by sediment or erosion during construction. They also are important habitats for various species of fauna. Experience from construction on sloping land show that large quantities of sediment can be carried into such

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<sup>16</sup>

<https://www.environment.nsw.gov.au/sites/default/files/2026-01/gardens-of-stone-sca-pagoda-walk-bush-camps-ref-attachment-a-response.pdf>

<sup>17</sup>

[https://www.researchgate.net/publication/322183399\\_Toxicological\\_and\\_environmental\\_issues\\_associated\\_with\\_waterproofing\\_and\\_water\\_repellent\\_formulations](https://www.researchgate.net/publication/322183399_Toxicological_and_environmental_issues_associated_with_waterproofing_and_water_repellent_formulations)

<sup>18</sup> <https://www.sciencedirect.com/science/article/pii/S2772416625002803>

<sup>19</sup> In the Ecological Assessment Report, this figure is incorrectly referred to as Figure 7.

<sup>20</sup>

[https://www.sciencedirect.com/science/article/pii/S2214581822001021#:~:text=The%20study%20area%20is%20affected,the%20entire%207%2Dyear%20period.&text=res%20image%20\(687KB\)-,Fig..m%20near%20the%20watershed%20outlet.](https://www.sciencedirect.com/science/article/pii/S2214581822001021#:~:text=The%20study%20area%20is%20affected,the%20entire%207%2Dyear%20period.&text=res%20image%20(687KB)-,Fig..m%20near%20the%20watershed%20outlet.)

drainage lines by heavy downpours and quickly overwhelm sedimentation barriers such as geotextile fabric and sandbags.

The Ecological Assessment Report requires that sediment control measures are put in place prior to and during construction and “ these should be inspected and maintained (e.g. sediment build up cleared) as deemed appropriate.” There is no guidance given as to who will inspect, how often or when such inspections will take place to ensure that there is no sediment build-up against the control measures, nor movement of sediment beyond the control measures. It would be wise to replace “Should be inspected” with “Must be inspected” and conditions put on construction to ensure these measures are adequate and properly maintained.

The Ecological Assessment Report states:

“Although, there are no mapped Key Fish Habitat (KFH) waterways within the study site, there are mapped KFH located within the vicinity of the proposal. These mapped waterways include three unnamed drainage lines and Carne Creek. Although located within proximity to the Bush Camps, these won’t be impacted by the proposal.”  
(Page viii Ecological Assessment Report)

When there is very heavy rainfall over a short period of time, or continued heavy falls over an extended time, the ephemeral drainage lines (Figure 7) shown running into Carne Creek, will carry any pollutants with them. This is particularly true of the accommodation node at “Bush Camp 2” which is closer to the cliff edge above Carne Creek. The chemicals that will leach from the building materials may find their way into Carne Creek and then adversely affect the invertebrate fauna as well as fish living in the creek.

Although the assessment above claims there will be no impact from runoff via the drainage lines and into Carne Creek, there is no reference to any supporting evidence for this claim.

The potential impact of the developments on the ephemeral drainage lines and on Carne Creek needs to be properly assessed and reported on by specialist engineers with appropriate accreditation, and subsequent relevant actions taken by the proponents of this development.

## **7. Helipad**

The Review of environmental factors (REF) states that a helipad will be installed within the footprint of each of the Bush Camps. The helipad will be used for the helicopter removing black waste from each camp. There does not seem to be information provided in the REF about the construction of this helipad apart from the fact that vegetation will need to be cleared. This information should have been included in the REF.

## **8. Weed management and the plantings related to the Ecomax**

The onsite treatment of grey water would introduce foreign soil and grass at each of the three sites. The waste management “Ecomax” contained in the “Report on Investigations and assessments for the siting of proposed effluent management systems at Gardens of

Stone State Conservation Area – Bush Camp 1 – 3”<sup>21</sup> describes the building of a mound of soil and sand as a part of the grey water waste management system. The report states on Page 15 that “a native grass cover will be required on the surface and adjacent disturbed margins immediately after construction.” The grass planting is required to enhance the functioning of the soil mound and assist with control of soil erosion. It is further stated that the grass will need to be mown. This arrangement is very likely to introduce and harbour weeds.

The native grass recommended in the report is *Microlaena stipoides*, which does not appear to be indigenous to the GOS SCA, even though it is an Australian grass species. It was not mentioned as one of the floral species recorded in the Ecological Assessment Report November 2025<sup>22</sup> by Lesryk Environmental Pty Ltd. Hence there is considerable risk that a non-indigenous grass, which could easily self-seed and become a weed problem is being introduced by NPWS into one of its own conservation areas.

This is clearly unacceptable. The species of grass cover to be used must be changed to be a locally occurring indigenous plant to reduce this risk.

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<https://www.environment.nsw.gov.au/sites/default/files/2026-01/gardens-of-stone-sca-pagoda-walk-bush-camps-ref-attachment-g-waste-management-assessment.pdf>

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