



NSW National Parks and Wildlife Service

Submissions report

**Public exhibition of Dorrigo Escarpment great
walk draft review of environmental factors**



Acknowledgement of Country

Department of Climate Change, Energy, the Environment and Water acknowledges the Traditional Custodians of the lands where we work and live.

We pay our respects to Elders past, present and emerging.

This resource may contain images or names of deceased persons in photographs or historical content.

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Summary

The proposal

The NSW National Parks and Wildlife Service (NPWS) is proposing the Dorrigo Escarpment great walk in Dorrigo and Bindarri national parks. Before the proposal can be authorised or the works carried out, the *Environmental Planning and Assessment Act 1979* requires the potential environmental impacts of the walk to be assessed via a Review of Environmental Factors (REF). The prepared draft REF for Dorrigo Escarpment great walk was on public exhibition between 24 January and 24 February 2025.

What we heard

NPWS received a total of 40 submissions on the exhibited draft REF. These came from a range of stakeholders, organisations, neighbours and local community members, primarily from the local area.

There were similar numbers of submissions supporting and opposing the proposal. Many submissions indicated support for the intent of the proposal, whilst having some concerns about elements of the proposal or the assessment. The top 3 most frequently raised topics in the community submissions were:

- environmental management – concerning the impacts of weeds, pathogens and diseases on biodiversity values and the assessment of the significance of environmental impacts
- social and economic impacts – concerning impacts on neighbours and local infrastructure, and also acknowledging the benefits of the proposal including health, wellbeing and economic benefits to the community
- description of the activity – concerning walk alternatives and options, the construction of huts and elevated walkways and the booking of both the walk and the huts.

Submissions offered constructive input on the proposal and the impact assessment, resulting in number of changes to the final REF.

Changes made to the proposal

Location of Camp 3

Since preparing the draft REF, and in response to public feedback, NPWS have decided to change the proposed location of Camp 3 to a site 300 m south of the Urumbilum picnic area. This change will improve environmental outcomes and reduce the length of access trail to be upgraded. It will also enhance the 4-day walk experience by making day 4 a shorter day, allowing walkers time to meet transport upon completion. Environmental assessment of the modification and relocation of Camp 3 will be provided in an Addendum report to the main REF. This will ensure transparent identification of any amended design elements of the walk in response to the public submissions.

Changes made to the REF

Permissibility under the National Parks and Wildlife Act 1974 and Regulation

A statement about permissibility under Object 3b relating to 'the public interest' has been added to Section 3.1.1.

Permissibility under other legislation

Additional information about NSW legislation and permissibility has been included in Section 3.3 of the REF including State planning policy documents, other State legislation and local environmental plans.

Summary of licences and approvals

Detail about approvals for off-park components of the walk, through consents, licences or agreements with the relevant land manager, has been added to Section 3.6.2.

Public exhibition of the draft REF

A description of the process and outcomes of public exhibition of the draft REF has been added to Section 4.3

Commercial tour operations

Section 6.2.1 – use of the walk by commercial tour operators under an Ecopass licence, as outlined in the draft master plan, has been added to the description of the proposal.

Section 6.3.5 – clarification of use of camp access trails has been added to confirm authorised vehicles only (NPWS, contract and emergency) on closed management trails.

Impacts of toileting away from camp facilities

Consideration and assessment of any additional impacts of toileting along the walk have been included in Section 6.4.6. and 9.1.2.

Introduction and spread of pathogens

In response to comments about the lack of information about the current distribution and impacts of pathogens in the Parks, a summary of expert advice, previous studies and sampling has been included in Section 8.3.11. Suggested 2 references have been added to the REF reference list. Parramatta grass has been added to the weeds in Section 8.3.10.

Bushfire risk assessment

A summary of bushfire risks and mitigation strategies has been added to Section 8 and Section 9.2.

Koala AIS

Additional information on the key threats outlined in the conservation action plan for the Koala AIS in Bindarri National Park has been added to the REF.

1. Overview of submissions

1.1 Public exhibition

The NSW National Parks and Wildlife Service (NPWS) exhibited the draft Review of Environmental Factors (REF) for Dorrigo Escarpment great walk (DEGW) between 24 January and 24 February 2025 – a total of 32 days.

The exhibited draft REF was made available online and via hard copies available at the Dorrigo Rainforest Centre. The public exhibition of the draft REF was promoted by:

- direct email to 1500 registered stakeholders
- media release and TV / radio interviews
- Facebook advertising and posters on park noticeboards
- 3 public information sessions (66 people)
- additional information session for Park neighbours (8 neighbours)
- 2 information sessions for other interest groups (36 people).

The online consultation page received 2,494 page views and 421 documents were downloaded.

The draft Aboriginal cultural heritage assessment report was distributed to Registered Aboriginal Parties (RAPs) along with an email notification of the public exhibition period.

The public was asked to provide comments online using the 'Have your say' consultation portal on the department's website and the NSW Government 'Have your say' website. These websites provide information on the purpose and intent of the draft REF.

1.2 Who commented on the draft REF?

We received a total of 40 submissions on the draft REF. These came from a range of stakeholders, organisations, neighbours and local community members. No form letters were received.

Submissions were received from individuals in the local area and throughout New South Wales as shown in Figure 1. See Appendix A for a list of the organisations that submitted feedback.

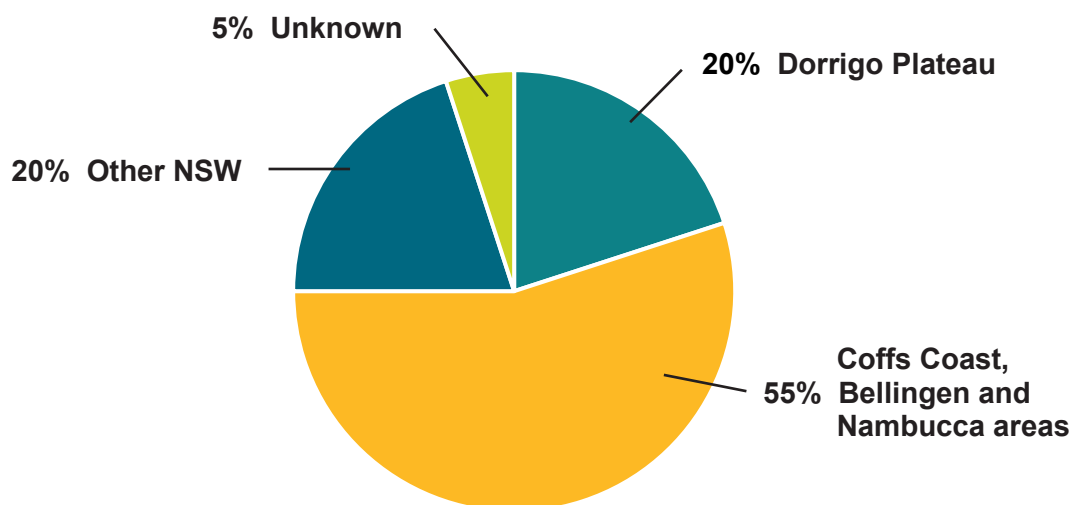
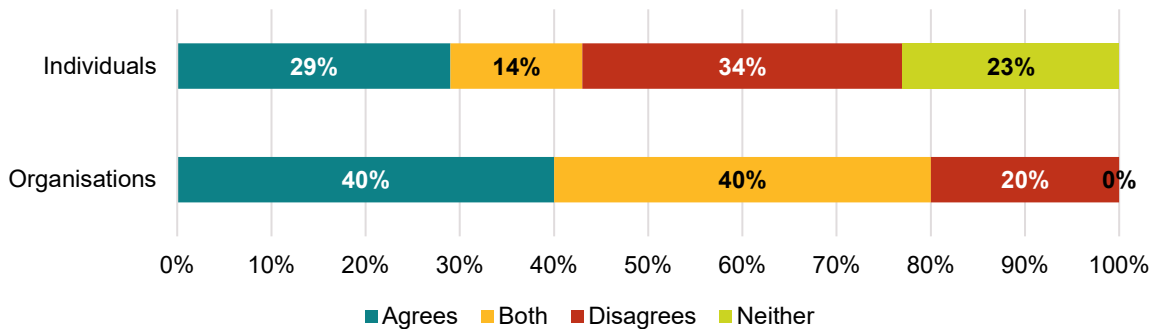


Figure 1 Location of people who submitted feedback on the draft REF

1.3 General feedback

Figure 2 provides an overview of the proportion of submissions that agreed or disagreed with the proposal and the draft REF.

- **Agrees** indicates support for the proposed DEGW and the REF’s general assessment of it
- **Both** indicates support for the intent of the proposed DEGW, with some concerns about elements of the proposal or the assessment
- **Disagrees** indicates the submission does not support the proposed DEGW
- **Neither** indicates that it is not clear if the submission supports the proposed DEGW or not.



Row 1 is individuals (n=35), row 2 is non-government organisations (n=5).

Figure 2 Overview of sentiment about the proposal and the environmental assessment

Submissions offered constructive input on the proposal and the impact assessment. The issues raised have been summarised into 6 key topic areas, which are discussed below along with NPWS response or action.

2. Analysis of matters raised

Each point raised in every submission was documented and considered by NPWS. Points were coded to one of 6 topic areas according to the subject of the comment as set out in Table 1.

Table 1 Topic areas and the number of total references in submissions

Topic area	Number of references
1. Justification and activity alternatives	12
2. Description of the activity	20
3. Social and economic impacts	22
4. Traffic, transport and parking	11
5. Planning and assessment process	19
6. Environmental management	22

Notes: Multiple points or references in a single submission have been counted separately, and supportive and opposing points are included in the same topic headings. Therefore, the quantity of references for each topic shown above does not reflect the number or balance of submissions received about each topic and should not be used to evaluate importance or sentiment.

The top three most frequently raised key issues relating to the proposal in the community submissions were:

1. environmental management
2. social and economic impacts
3. description of the activity.

All collated points within each topic area were then considered to see if a change to the proposal was needed. Changes to the proposal presented in the draft REF were considered if any of the submissions raised points that met the following criteria:

- an alternative strategy or mitigation action that would better support delivery of the proposal's objectives
- new, updated or additional information of direct relevance to the impact assessment
- a basic factual or editorial error or omission that should be corrected.

Some of the written submissions on the draft REF raised similar issues to those received on the Dorrigo Escarpment great walk draft master plan. For a more detailed description of the feedback received on the draft master plan and the NPWS response, refer to the *Dorrigo Escarpment great walk project submissions report* (see link in 'More information' section).

Each topic area is presented below with a summary of the key points and NPWS response.

3. Key feedback themes

3.1 Justification and activity alternatives

This topic looked at the overall justification for the project and captured many comments supportive of the proposed DEGW and the benefits it would bring. Feedback on this topic area was made in 12 submissions and is summarised in Table 2.

Table 2 What feedback was received on the justification for the proposal

Topic areas	Number	Summary of feedback	Change to REF
Justification and purpose of national parks	9	The proposal meets the purpose of national parks for environmental conservation and awareness and Gumbaynggirr cultural engagement. However, some submissions suggested the proposal is not justified or should be scaled back to prioritise protection of World Heritage values.	No change – see MNES 5.1 for assessment of impact on World Heritage values
Route options assessment	7	Support for track route avoiding culturally sensitive areas. Concern about steep sections and management of informal tracks to waterfalls. Suggestion to start at park boundary on Dome Road and re-route Day 1 to existing track to avoid impacts.	No change – see responses below

Example comments

'Support the proposal... acknowledging minor impacts. Agree that safeguards and management measures will ameliorate or minimise these impacts. On balance - agree the proposed DEGW is considered justified'

'It is not sufficient to resolve to address impacts 'as far as practicable'. They should be avoided, or the project modified'.

NPWS response

3.1.1 Justification

- The project aligns with the objects of the *National Parks and Wildlife Act 1974* as set out in section 2A, including acknowledging and implementing (giving effect to) the public interest in protecting park values and in managing the land.
- The proposal is consistent with the management principles for national parks (s.30E of the *National Parks and Wildlife Act 1974*) and the plan of management for the Parks.
- The impacts of the proposal on the outstanding universal values (OUVs) of the Gondwana Rainforests of Australia World Heritage listing have been assessed in accordance with:
 - Matters of National Environmental Significance – Significant impact guidelines 1.1 (CoA 2013) as detailed in REF supporting document B MNES report.

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- Assessing heritage significance (DPE 2023) and Guidance and toolkit for impact assessments in a World Heritage Context (UNESCO 2022), following the approach presented in Guidelines for preparing a statement of heritage impact (DPE 2023) as detailed in REF supporting document D Statement of heritage impact.
- The assessments found that the new multi-day walk would result in a negligible direct (physical) and indirect (visual) impact to the OUVs of Gondwana Rainforests of Australia as ascribed on the World Heritage, National and State Heritage lists. That is:
 - The works will not cause one or more of the World Heritage values to be notably altered, modified, obscured or diminished.
 - No disturbance to important geological, landscape features or land formations is expected under this proposal.
 - The likely impacts on important Gondwana Rainforest relicts such as ferns, conifers, primitive flowering plants, and ancient songbirds that occur predominantly within Keith Formation 'Rainforest' Plant Community Types are restricted to just 4.57 ha of such rainforest habitat.
 - The DEGW is unlikely to have a significant impact on the 21 threatened species and 6 migratory species that are known or likely to occur within the study area. given there are extensive areas of similar habitat present.
- Once completed, the DEGW will provide one of the few opportunities in New South Wales for extended walking within the Gondwana Rainforests of Australia area, providing opportunities for education and appreciation of rainforests and improved social and recreational experiences.
- NPWS provides nature-based tourism experiences that meet conservation and economic development goals. A key objective of the project is to deliver a world class multi-day walk that would cater for local, regional, national and international tourism, bringing significant economic benefits. The proposal will balance conservation of natural, cultural and social values with recreation, tourism and economic opportunities.
- The REF does acknowledge there would be minor negative impacts to the local environment and some parts of the community during construction of the DEGW. Impacts have been avoided and/or minimised wherever possible through design and the ability for micro-siting and site-specific and activity-specific safeguards.
- The REF details the environmental investigation and defines the maximum area within which the proposed DEGW and its associated construction works will be located. The activity area provides as much clarity and certainty as possible for the assessment, but retains some flexibility to avoid, minimise and manage any potential environmental impacts during construction, so the actual impact area is likely to be less.
- The potential environmental impacts identified from the activity have been considered and avoided or reduced during the REF preparation. Further clarity around pathogen management, traffic and operational elements have been included, along with additional safeguards and management measures. On balance the proposed DEGW is considered justified.
- There is widespread support for the DEGW. Most respondents to the draft master plan survey supported or strongly supported the walk proposal and 900 of the almost 1300 people on the register of interest for the project indicated they are interested in doing the multi-day walk.
- Regardless of tracks, more and more people are using trail apps to explore and share their adventures in remote natural areas. The DEGW will help to manage this increasing use with sustainable infrastructure and improved education to reduce impacts.

3.1.2 Route options assessment

- NPWS followed the appropriate requirements of an options assessment when preparing the REF. Strategic alternatives and site alternatives were considered including the option to do nothing.
- The track route has undergone multiple design refinements to enhance the walk experience, to improve track grade, safety and resilience, to avoid sensitive locations and to reduce environmental impacts.
- The initial proposed walk alignment balanced technical feasibility, cost and environmental impacts. The outcomes of the comprehensive options analysis were captured in the REF.
- The alignments have also been reviewed by a professional track designer and builder whose recommendations have been incorporated into the construction documentation. The suggested additional side-tracks to waterfalls would require significant investment due to very steep terrain and will be considered as funding allows. Any informal track creation will be discouraged, with noncompliant behaviour monitored and managed as the need arises.
- Suggestions to reduce new track construction by using existing walking tracks only for Day 1 have been considered but would not provide the same quality of hiker experience such as Dorrigo Plateau views. The Dome Mountain section is essential to the 2-day walk experience and will also provide a spectacular new full-day loop from Baliiga picnic area.
- Starting the multi-day walk at the Dorrigo Rainforest Centre has the following benefits:
 - transport hub with ample parking compared to Dome Road park entry
 - reduces traffic using Dome Road
 - hiker briefing room for minimal impact, safety and respecting Country messages
 - increases the opportunity for Gumbaynggirr and Gondwana interpretation
 - allows for improved implementation of hygiene protocols for users.
- The REF considered the proposed alignment to be the optimal solution to meet the walk objectives.

3.2 Description of the proposal

This topic covers feedback on key elements of the proposed walk including the route, infrastructure and ongoing operational management. The majority of the submissions received related to alternatives and options, and in particular challenged the construction of huts and elevated walkways and the booking of both the walk and the huts. Other issues raised in submissions concerned access tracks, waterway crossings, equity of use and construction methods. Feedback on this topic was made in 20 submissions and is summarised in Table 3.

Table 3 What feedback was received on the description of the proposal

Topic areas	Number	Summary of feedback	Change to REF
Design elements	16	Support for minimal impact design principles. Concern over level of infrastructure development (huts, steps, bridges and lookouts) for a Grade 4 track. Opposition to hiker huts due to vegetation removal and affordability concerns. Camp development should be staged with camping platforms first and huts only if walk is meeting environmental impact conditions.	Yes – change location of camp 3 to reduce impacts (Addendum report)

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Operational management	8	Support for NPWS management and track ranger model for education, monitoring and compliance. Ensure modest and affordable accommodation and equitable access to bookings. Questions about controlling numbers of day walkers and use of camp access trails by commercial operators. Better transparency and assessment required.	Yes - clarify use of the walk and access to camps by tour operators.
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Example comments

'The proposed hut and elevated walkways... are not supported by Wilderness Australia... as it requires rainforest clearing that is inconsistent with... the management principles for a national park'

'Builds on comments on draft master plan relating to concerns over loss of equity in access and affordability, for independent and local users in favour of commercial tours'

'...commitments by NPWS, retaining self-reliant camping, non-exclusive & affordable, to protect and not degrade environmental heritage'

'NPWS needs to be mindful that opportunities to book camping areas should be equitable and that independent walkers are not disadvantaged'

'Strongly support track ranger model - very important and strength of the REF... particularly if it is to incorporate hygiene management and protocols, such as ensuring shoe cleaning stations are maintained'.

NPWS response

3.2.1 Design elements

Camp locations

- Since completing the draft REF and reviewing feedback, NPWS have decided to change the proposed location of Camp 3 to reduce environmental impacts and optimise walking distances for each day. The new location is closer to Urumbilum picnic area and eliminates the need to upgrade the existing off-park (State Forest) remote management trail (2.6 km) and dormant trail (340 m). A shorter 300 m of dormant track to the new proposed site will require upgrading for construction and service access.
- This change also removes the need for a new 30 m vehicle bridge over the Urumbilum River to access Tuckers Knob fire trail and instead proposes to build a smaller (15 m) vehicle bridge over the adjacent Pine Creek tributary at the location of an existing derelict timber bridge. Two short sections of walking track will also be realigned to accommodate access to Camp 3 and Bridge 5.
- This change will improve environmental outcomes and enhance the 4-day walk experience by making day 4 a shorter day, allowing walkers time to meet transport upon completion.
- Environmental assessment of this modification of the proposal for Camp 3 will be provided in an Addendum Report to the REF.

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Camp design

- Hiker huts support participation by a broader range of walkers by removing the need for expensive hiking tents and reducing pack weights. As one of the wettest places in New South Wales, the DEGW is well-suited to a hut experience and bunk buildings will be appreciated in the often wet and cool conditions. The proposed huts are low-key and compact and have a footprint smaller than the camping platforms. They are not luxury offerings, with only minimal facilities, and will not be visible in the forest setting.
- A staged approach to development of the camps is not currently possible due to project management and budget timeframes. The walk master plan is based on an environmentally and economically sustainable track ranger model where the revenue from a range of accommodation options subsidises ongoing operational support such as maintenance, monitoring, compliance and hiker education.

Access trails

- The camp access trails will only be used by NPWS or approved contractors for regular maintenance and service runs (e.g. weekly). NPWS staff may occasionally deliver tour operator supplies at the same time. Commercial tour operators will have short walk-in access to Camp 1 (from nearby Baliiga picnic area) and the revised Camp 3 location (from nearby Urumbilum picnic area) however Camp 2 will not be easily accessible by vehicle.
- Access trails (for management purposes only) will have gates and bollards to prevent unauthorised vehicle access, including illegal motorcycle use.
- Some temporary access for construction is proposed over private land. NPWS will negotiate an agreement with the adjoining landowner for temporary access when required.

Infrastructure

- Lookouts and crossings will be designed with minimal structures in keeping with the remote setting and nature of a grade 4 remote walk experience.
- Lookout fall risk will be managed by careful design and placement of natural features such as a low rock wall to define the safe area. Where fall risk can't be managed effectively using natural features then an appropriate handrail may be required.
- As stated in the REF several new waterway crossings will be required. The crossings will include stone, culvert, low level short span fixed bridges or longer span suspension bridges. The crossing infrastructure will be the minimum required for safety and longevity, and will be restricted to single person capacity.
- The waterway crossings will be designed and constructed in a manner that would not impede stream flow or restrict fish passage, and also to minimise flood risk and upstream and downstream impacts. These requirements for the waterway crossings are captured in the mitigation measures of the REF.

3.2.2 Operational management

- The multi-day walk will be managed by NPWS, and the price point will be determined based on similar NPWS facilities and experiences.
- Several different walk itineraries are possible depending on the style of experience walkers are seeking – guided commercial experiences, independent bunk-style accommodation or tent platform camping. These different experiences will range in price and aim to cater for all budgets.
- A track ranger for the walk can identify and manage emerging risks and implement pest and weed control and monitoring as well as fire risk mitigation works.

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- Daily limits on multi-day hikers, signage, education and pre-walk briefings will also help minimise the impacts of visitor behaviour on park values and neighbours.
- It is envisaged that the proposal will significantly increase the recreation potential of the area. The area of the proposed track alignment currently has very few walking opportunities due to its ruggedness and inaccessibility.
- The hiker hut model will provide an alternative for visitors of different ages and abilities to experience the Dorrigo Escarpment great walk. For example, the huts will provide increased opportunity for family walking groups to experience the parks – with different generations walking together and overnighting in bunk-style accommodation.

3.3 Social and economic impacts

This topic covers feedback on the impacts on neighbours, and social and economic impacts to the local area. Feedback on this topic was made in 22 submissions and is summarised in Table 4.

Table 4 What feedback was received on the impacts on social and economic values

Topic areas	Number	Summary of feedback	Change to REF
Neighbours	4	Neighbours identified concerns over increased noise, litter and bushfire risk, and loss of natural ambience where the track passes close to private property boundaries.	No change
Local business	2	Priority to be given to the use of local business and also the DEGW will generate local employment; increase in visitors will support local businesses.	No change
Community consultation	4	Appreciation for community consultation to date, First Nations involvement and extensive and informative documentation.	No change
Community benefits	18	A number of submissions cited the benefits of the proposal, including health, wellbeing and economic benefits to the community. These comments were generally very supportive and looked forward to work on the walk commencing.	No change

Example comments

'The noise of passing hikers will diminish the tranquil ambience of our forest... a significant negative impact on the character and atmosphere of our property'

'The Dorrigo Escarpment Great Walk is an exciting proposal that will boost tourism and provide a fantastic opportunity to experience these National Parks'

'This is BRILLIANT... Exactly what so many young teenagers & adults & families need for wellbeing'.

NPWS response

3.3.1 Neighbours

- The short-term social impacts are minor and localised to the sections of track area being constructed. These impacts include amenity (visual, noise, dust and access) and temporary changes to the access on Dome Road during construction.
- The potential long-term impacts relate to scenic (or visual) and landscape amenity (or character) because of the introduction of new infrastructure and subsequent use into Dorrigo and Bindarri national parks.
 - Eco Logical Australia assessed the impacts of the proposal as not significant given the small-scale and remoteness of most infrastructure, the dense vegetation surrounding the activity area and the use of natural materials that blend into the environment (REF Section 9.3). The impact assessment is based on the context of 'visual sensitivity' and 'magnitude of visual change'. Using the relationship between 'sensitivity' and 'magnitude of change', the resulting visual 'impact level' rankings are insignificant to low. During construction of the DEGW the visual impact level would be low for most of the activity area, associated with the movement of workers and equipment. The impact would be reduced in the longer term by less activity and landform rehabilitation. Visually the DEGW will have insignificant visual change from sensitive receivers.
 - Eco Logical Australia also assessed the landscape amenity impacts of the proposal as not significant. The sensitivity of different landscape amenity in regional areas can be defined by considering aspects such as naturalness and uniqueness. The more disturbed or common a landscape is, generally the less it is valued, and the less 'sensitive' it is. The assessment is based on an indication of potential impact using the relationship between 'sensitivity' and 'magnitude of change'. During construction of the DEGW the amenity impact level would be moderate for most of the activity area, associated with the movement of workers and equipment noise. The impact would be reduced in the longer term by less activity although considered low.
- NPWS will continue to consult with park neighbours about the impacts of the proposal on their operations and amenity. A track ranger for the walk can identify and manage emerging risks and implement pest and weed control and monitoring as well as fire risk mitigation works and education.
- Daily limits on multi-day hikers, as well as signage, education and pre-walk briefings, will also help minimise the impacts of visitor behaviour on park values and neighbours.

3.3.2 Local business

- Construction of the project is expected to generate a significant number of full-time jobs for residents and construction workers including creating employment opportunities for the Dorrigo area and the wider Coffs Coast region. A number of indirect jobs will likely be generated as a result of the DEGW. The project will potentially provide additional benefits for local businesses servicing the construction industry.
- The proposal includes objectives to support local employment and business opportunities, provide skills and opportunity for cultural development and increase workplace diversity.
- Benefits to local business are expected during operation of the DEGW including accommodation, hospitality and transport businesses.

3.3.3 Community consultation

- NPWS has met and exceeded project commitments for community consultation including with Aboriginal organisations and interested individuals. The project team welcomes constructive feedback at any time and will continue targeted consultation as the visitor experience is developed, and the DEGW is constructed.

3.3.4 Community benefits

- The benefits of the project include the provision of more environmental and nature tourism opportunities for locals and visitors. The social benefits include building family connections, a sense of community and friendships, a safe environment, and nature connection and environmental education opportunities.
- A key objective of the project is to deliver a world class multi-day walk within Dorrigo and Bindarri national parks that caters for local, regional, national and international visitors. It is expected that the full DEGW experience will attract between 5,000 and 7,000 walkers per year if at full capacity all year round, although closures to rest Country and during extreme weather events will reduce that capacity. The 2-day overnight walk experience would attract a similar additional number of walkers.
- NPWS recognises the significant benefits of the proposal to the outdoor and tourism community and in supporting the growth of nature and cultural tourism in NSW. As tourism is a key contributor to the NSW economy, this would have beneficial implications for local and regional businesses, including Aboriginal-owned businesses.

3.4 Transport, traffic and parking

Submitters raised concern regarding insufficient parking, safety on Dome Road and additional traffic. Feedback on this topic was made in 11 submissions and is summarised in Table 5.

Table 5 What feedback was received on the impacts on traffic, parking and transport

Topic areas	Number	Summary of feedback	Change to REF
Local roads	6	Neighbours identified concerns over flood access, roads and parking congestion. One cited issues with current visitors on Dome Road such as speeding, litter, biosecurity, dogs and illegal camping.	No change – some operational matters beyond REF scope or Council responsibility
Existing recreational opportunities	5	Concerns about loss of current access to recreational opportunities due to increase in day visitors, car park capacities, commercial tours and overlap with bike trails.	Yes – clarify bike riding on shared trails
Local infrastructure	8	Concerns about increased traffic on Waterfall Way, and burden on ratepayers for additional use of infrastructure including roads and sewerage.	No change – see response below
Transport and parking	5	Concerns raised regarding parking and access.	No change – see response below

Example comments

'Is there sufficient car parking? What are the options if car parking becomes an issue? Will operation of the track impact current recreational use of the area? e.g. too many people, not enough parks?'

'Can't handle more tourists coming through Bellingen. Require detour around Waterfall Way for new tourists and trucks, and to stop people going to the Promised Land'

'Supporting infrastructure must include road improvements Waterfall Way Dorrigo to Thora, Dome Road, width and surface, and sensitive extensions to car parks'

'Infrastructure upgrades will be crucial, particularly to ensure safe and efficient access up and down the mountain... The road needs improvement to handle increased traffic'.

NPWS response

3.4.1 Local roads

- NPWS and Bellingen Shire Council are working together to address traffic and road safety concerns on Dome Road. Dome Road is classified as a local road and provides access to Dorrigo National Park from Waterfall Way. Beyond the Dorrigo Rainforest Centre, it provides access for a number of residents and visitor access to Baliiga picnic area. It is generally a two-way 5.5-metre-wide bitumen sealed road, with no road shoulders, changing to a gravel surface around 4 km from Waterfall Way.
- NPWS is working with the City of Coffs Harbour on access to the end of the walk in Dairyville. Pine Road and Jersey Bull Road provide access to Bindarri National Park from the end of Dairyville Road. The splash crossing where the council road crosses Shingle Bed Creek outside the park boundary is impassable to both vehicles and pedestrians in times of flood (although there is an alternative emergency exit via Pine Road to Ulong). This will be addressed separately with the council in consultation with the resident on the park side of the crossing.
- DEGW users will be encouraged to make use of shuttle services for drop offs and pickups thereby reducing individual vehicle movements on local roads.

3.4.2 Existing recreational opportunities

- The DEGW greatly improves the recreational opportunities available in Dorrigo and Bindarri national parks including short walks and overnight opportunities.
- Where the DEGW coincides with management trails currently available for mountain biking (e.g. short sections of Bangalore and Slingsbys trails), the track will be signposted as dual use and mountain biking permitted with care. There will be no consequent loss of mountain biking opportunities.
- The Baliiga picnic area is proposed to have several upgrades to cater for increased day use visitors, including increased car parking capacity, wayfinding improvements and overall amenity improvements.
- Existing car parks at Blackbutt track head and Baliiga, Bindarray and Urumbilum picnic areas will be monitored for congestion during busy periods (with additional day users), and dispersal strategies will be implemented to ensure positive visitor experiences.
- Hikers will be able to be do the walk independently or guided with a licensed commercial tour operator. The walk will not have separate commercial or private exclusive use components. The same facilities available to independent walkers will be those used by guided walkers. Bookings will be managed to provide fair and equitable access for both independent walkers and commercial tour operators.

3.4.3 Local infrastructure

- Waterfall Way is classified as a state road (no. 76) and connects the rural communities of Bellingen, Dorrigo and Ebor with the urban centres of Coffs Harbour and Armidale. It is also a tourist route passing the waterfalls on the Dorrigo Mountain and it provides a transport route for the timber and agricultural industries.
- The NSW Government has funded vital road and safety improvements along the Waterfall Way to the amount of \$50 million. Over the past four years, this funding has been used to improve safety, reliability and travel times, and addressing safety for pedestrians and traffic in the Dorrigo town centre.
- Bellingen Shire Council maintains approximately 80km of Waterfall Way under agreement with Transport for NSW. Updates on current works can be found on the Council website.
- The DEGW users will not add substantially to the volume of traffic on Waterfall Way, especially if shuttle buses are employed for small groups.
- NPWS is contributing to local infrastructure upgrades required for the DEGW project (including the new Dorrigo Arc Rainforest Centre), such as sewerage, electrical and water infrastructure.

3.4.4 Transport and parking

- DEGW track users will be encouraged to utilise off-site parking and shuttle services provided by accommodation providers or licensed private operators, to reduce parking requirements.
- During busy periods, signage can be used to indicate when remote car parks are at capacity to reduce unnecessary trips.

3.5 Planning and assessment process

Most of the submissions on the planning and assessment process raised concerns regarding procedural matters, including comments on the planning approval pathway and questions regarding the adequacy of the REF.

Other matters raised were:

- Concern that the planning approval pathway is flawed, and that the status of the project has resulted in an inadequate planning approval process.
- Questioning the adequacy of assessment of asset of intergenerational significance and environmentally sensitive landscapes.

This topic also covers feedback on any errors and omissions in the REF including correct names and labels, issues with maps and lack of detail. Feedback on this topic was made in 19 submissions and is summarised in Table 6.

Table 6 What feedback was received on planning and assessment process in the REF

Topic areas	Number	Summary of feedback	Change to REF
Mapping issues	2	Complaint that resolution of maps is insufficient to see all location details.	No change – see response below
Additional info or correction	9	Concern about risk of rockfalls and landslides in steep track sections. Updates required for legislation and departmental names.	Yes – minor changes made to REF

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Insufficient detail provided	17	Concern that the REF does not adequately address off-park activities under the EP&A Act and other applicable legislation. Other comments on insufficient detail: <ul style="list-style-type: none">• Lack of detail of camp design and layout• Inadequate consideration of Koala AIS¹ and the risks in the conservation action plan• Suggestions for additional impacts for REF Section 9	Yes – changes made to REF to address off-park activities, other applicable legislation and Koala AIS
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¹AIS – Asset of intergenerational significance

Example comments

‘There has been no mention of the danger of rock falls or slipping off the edge in this very steep area of the escarpment’

‘Support the multi-day walk proposal. The Draft REF is quite comprehensive, but only in some areas. Unfortunately, there are some significant oversights...’

‘the proposal is a significant development and will be important to the local and broader community, therefore it needs to be assessed adequately’

NPWS response

The activity is subject to Part 5, Division 5.1 of the EP&A Act, and in accordance with those requirements. NPWS prepared the draft REF and placed it on public exhibition. All submissions received during the public exhibition period have been reviewed and responses are provided in this submissions report.

The primary purpose of an REF is to allow readers to gain an understanding of the environmental assessment that has been carried out, while also providing access to the supporting technical assessments, which are very detailed documents and can be overwhelming in quantity. It is difficult to reduce the quantity of some of these documents due to the scientific and technical nature of the studies and their reporting requirements.

3.5.1 Mapping issues

- The maps in the REF and supporting documents are at the highest resolution possible given the limits of online document size. The DEGWS sections are shown in more detail in Supporting document E - Ecological assessment report.

3.5.2 Additional information or correction

- Section 9.1 lists the likely impacts of the activity to construct and operate the DEGWS. A well-constructed track with appropriate alignment, drainage and hardening including retaining walls will not increase the current likelihood of rockfalls and landslips. Management of these inherent risks are covered by the NPWS Landslides and rockfalls policy (see link in ‘More information’ section).
- Risks to visitors from falls in steep sections will be managed according to the NPWS Visitor safety and Walking tracks policies (see link in ‘More information’ section). Tracks will be constructed to Grade 4 standard and appropriate fall height protection structures (e.g., safety railings and notification signage) will be employed where the risk of falling is elevated by local topography.

3.5.3 Insufficient detail provided

- Final camp design was not available for the environmental assessment. Camps were assessed as having 70% impact within the activity footprint. This is based on maximum potential impact of camp layout and does not rely on detailed camp designs. Detailed design will further minimise impacts on natural values as described in the camp design principles.
- Additional detail has been added to the REF about approvals for off-park components of the walk, through consents, licences or agreements with the relevant land manager, including:
 - walking track construction on freehold land where the track construction footprint may cross the park boundary near Mt Wondurriyah
 - temporary vehicle and/or walk-in access for track construction purposes in several locations using existing tracks with consent arrangements
 - upgrades to Whitneys Trail through private property, Crown Land and City of Coffs Harbour local road reserves
 - ongoing management access using existing local roads.
- Additional information on the key threats outlined in the conservation action plan for the Koala AIS in Bindarri National Park has been added to the REF. The main potential impact is inappropriate fire regimes. NPWS will adopt guidance on appropriate fire regimes including developing and implementing site specific burn planning, fire protection measures and integration into the bushfire risk management plan and operational response. Campfires are not permitted on the DEGWS and the walk will be closed during periods of elevated fire risk according to pre-determined triggers.
- Additional information about NSW legislation and permissibility has been included in Section 3 of the REF including:
 - State planning policy documents
 - other State legislation
 - local environmental plans.

3.6 Environmental management

This topic covers feedback on the impacts of weeds, pathogens and diseases on biodiversity values and the assessment of the significance of environmental impacts. Feedback on this topic was made in 22 submissions and is summarised in Table 6.

Table 6 What feedback was received on environmental management

Topic areas	Number	Summary of feedback	Change to REF
Significance of impacts	20	Some submissions dispute the findings that impacts are not significant (specific examples cited include Gondwana frogs (OUV ¹), scrub turpentine (critically endangered), canopy dieback in Antarctic beech trees (OUV)). One suggests the assessment understates the combinations and cumulative effects of multiple minor impacts. One questions the definitions of direct and indirect impacts and another suggests the bushfire risk has been underestimated.	Yes – impact definitions reviewed Bushfire risk reviewed and detail added
Pathogens and diseases	10	Strong support for hygiene requirements to minimise spread of pathogens but concern that hygiene measures won't work and risk to susceptible species is too high. More information requested on current	Yes – summary of expert advice, previous studies and sampling included

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		distributions of Chytrid disease, Myrtle rust and Phytophthora. Additional references suggested.	2 references added
Weeds	2	Request to add Parramatta grass to list of weeds of concern – currently on Syndicate track. Neighbours require notification of construction near property and detail of equipment cleaning protocols.	Yes – amend REF. Include cleaning protocols in CEMP ² and OEMP ³
Additional impacts	2	The impacts of hikers urinating and defecating outside of camp facilities has not been considered in REF including off-track trampling, nutrient loading, littering, social and health-related impacts and trespassing on neighbouring properties.	Yes – REF has been reviewed to include these potential unintended impacts
Mitigation of impacts	12	The walk proposal is environmentally sustainable, and safeguards will minimise impacts as long as biosecurity risks are managed and monitored. Some concerns about environmental management of both construction contractors and ongoing use.	No change – specific impacts addressed

¹ OUV - Outstanding universal value (World Heritage)

² CEMP - Construction environmental management plan

³ OEMP - Operational environmental management plan

Example comments

'Protect our environment and desist. The environment of the National Park can never be protected due to continual encroachment on its integrity'

'Opposed to walk due to environmental disturbance to koala habitat, adding pressure to areas undisturbed for decades. Enough access points already. Keep it untouched and clean and for everyone'

'Spread of pathogens is misclassified as an indirect impact, when it is a direct consequence of this activity'

'These impacts when considered together would likely have a far greater impact than when treated individually'

'existing disturbed areas within the parks... have in most instances been fully regenerated and no longer appear disturbed'

NPWS response

3.6.1 Significance of impacts

- The REF has considered all aspects related to threatened species and communities as detailed in supporting documents A and B. Construction and management of tracks and camps will have some impact on the environment and special features of the park, but significant impacts are not anticipated. The proposed routes and hut locations have been extensively reviewed and modified to avoid as much impact as possible on natural landscapes and cultural heritage.
- The REF and the ecological assessment report determine that there will not be a significant impact, consistent with S.7.3 of the BC Act and published significant impact

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guidelines, and therefore an EIS is not required. A significant impact on threatened species and ecological communities generally only arises if a project is likely to lead to the local extinction of threatened biota. Local extinctions are highly unlikely as a result of sensitively building and managing a walking track through an intact landscape.

- Extensive environmental assessment leading up to the preparation of the REF and the ecological assessment report adequately assess the impacts of the proposed project.
- A construction environmental management plan will be developed to communicate minimal impact requirements and conditions for the construction phase.
- NPWS will closely monitor the impacts of visitation and put control measures in place, where necessary, which will be detailed in the operational management plan, to minimise the impact on the environment, and Aboriginal and historic heritage.
- The DEGWS is considered to be in a relatively low fire impact area due to the predominant rainforest and wet sclerophyll nature of the vegetation. Mitigating the risks of unplanned fire during both the construction phase and operational phase of the proposal will involve a range of strategies and actions (see REF section 8), including:
 - fuel stove only restrictions with open fires permitted only in dedicated fire places
 - proactive park fire bans, park closures and track closures based on predicted fire risks and set fire preparedness policies
 - ongoing fire mitigation works including hazard reduction burning and cultural burning to reduce the levels of fuel hazards in strategic locations.
- The project is being referred to the Commonwealth under the EPBC Act to assess the level of impacts under national legislation. If the impacts are deemed significant and the project is a controlled action, the proposal will be reviewed in light of approvals under the EPBC Act.
- NPWS is committed to rehabilitating and restoring appropriate areas on park as part of addressing impacts of the DEGWS construction. A draft Impact Mitigation Framework is being developed in consultation with specialists from Conservation Programs, Heritage and Regulation Division of DCCEEW, to identify appropriate methods and areas for rehabilitation.

3.6.2 Pathogens and diseases

- Phytophthora, Chytrid disease and Myrtle rust are key threats to the Gondwana Rainforests of Australia outstanding universal values. Expert advice and existing research suggest that all 3 are present in the parks.
- Phytophthora has been recorded from soil samples taken at various locations and intervals since 2011 including at the Rainforest Centre and along the proposed DEGWS route.
- Research suggests that Dorrigo NP has a high likelihood of Phytophthora being present in the landscape usually with minor consequences on warm temperate rainforest and wet sclerophyll forests. Vegetation impacts generally only occur where other stresses, such as a flash drought on skeletal soils, make the plants more susceptible, resulting in small areas of visible dieback, particularly in hoop pine.
- Chytrid fungus is also assumed to be endemic in the frog populations within the parks and has been observed in isolated specimens. Education on awareness, reducing spread and monitoring for impacts will be key tools for visitors.
- Infrastructure at creek crossing is designed to keep hikers away from waterways to minimise accidental spread. Where swimming is likely at camps, washing facilities will encourage cleansing before swimming to help reduce contaminants and protect amphibians. Monitoring and other measures to reduce the impacts of Chytrid will be implemented where possible.

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- Myrtle rust is widespread in the parks with all scrub turpentine plants showing signs of the disease. The rust is spread by wind, water and gravity as well as by people and contaminated equipment.
- The implementation of strict hygiene infrastructure and protocols to help reduce the risk of spreading these pathogens and diseases is a key mitigation strategy. This will also help reduce the risk of introducing novel pathogens and diseases and environmental weeds.
- A hygiene management strategy will be developed for Dorrigo and Bindarra national parks as part of the CEMP and OEMP, and will include the following strategies:
 - Hygiene stations for boot cleaning will be located at all track heads, including side tracks, and at camps to minimise spread between track sections.
 - Education and interpretation for park users, including hiker briefings at the start of the walk, will emphasise these risks and hiker responsibilities – caring for Country will be a key focus of the walk.
 - Track closures during periods of severe weather events and seasonal closures for recovery periods during the wet season will also reduce the potential for spread of pathogens and diseases.
 - Ongoing monitoring will be programmed along with pest, weed and fire management programs.

3.6.3 Weeds

- Parramatta grass will be added to the list of weeds as it occurs on the Syndicate Track near Gleniffer that joins the walk near Lanes Lookout.
- The construction environmental management plan will include protocols for vehicle washing and neighbour notification for construction vehicles.

3.6.4 Additional impacts

- Section 8.3.12 of the REF considers vegetation trampling, littering and noise from human activity. These impacts are likely to peak during construction and diminish during operation. Several mitigation measures have been recommended in Section 9 to reduce risks associated with increased human activity.
- Toileting along the track is likely to occur between the Dorrigo Rainforest Centre and remote toilets at Camp 1, Waygarrgala camp, Camp 2, Camp 3 and Bindarra picnic area. Walker education and briefing will include minimal impact protocols for toileting that reduce impacts and minimise unintended consequences such as off-track vegetation trampling and trespassing. Signage may be required to identify adjacent private property in some locations. Walkers will also be required to carry a small shovel to bury any waste. Consideration and assessment of any additional impacts of toileting along the walk have been included in Section 6.4.6 and Section 9.1.2.

4. Next steps

NSW National Parks and Wildlife Service will consider this feedback in finalising the review of environmental factors. It will then be considered by the Executive Director to determine whether the proposal should proceed as proposed or be modified. If the proposed DEGW is determined to proceed, we will publish the final REF and its decision statement, keeping the community informed and updated on the DEGW's delivery.

The proposal will be referred to the Heritage Council of NSW to provide Section 60 approval under the Heritage Act 1977, for works or activities within the curtilage of heritage listed items. The Gondwana Rainforests of Australia World Heritage is listed on the State Heritage Register for New South Wales.

The project will also be referred to the Australian Department of Climate Change, Energy, the Environment and Water under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to assess the level of impacts to National and World Heritage and threatened species.

5. More information

NPWS will continue to provide updates as the project progresses. Anyone who has not yet registered their interest in the project can do so on the [Dorrigo Escarpment Great Walk project webpage](#).

[Dorrigo National Park, Bindarri National Park and Bindarri State Conservation Area plan of management](#), DCCEEW, 2024.

[Dorrigo Escarpment great walk draft master plan](#), DCCEEW, 2024.

[Dorrigo Escarpment great walk project submissions report](#), DCCEEW, 2024.

[Conservation Action Plan – Koala AIS](#), DPE, 2023.

NPWS park policies:

- [Landslides and rockfalls](#)
- [Visitor safety](#)

Appendix A

Submissions from organisations

The organisations that made submissions on the draft review of environmental factors for the Dorrigo Escarpment great walk are listed in Table A.

Table A Organisations that provided submissions

Number	Organisation	Address	Date received	Confidential?
1	National Parks Association (NPA) NSW	Sydney, NSW	24/02/2025	No
2	NPA Coffs Coast	Coffs Harbour, NSW	24/02/2025	No
3	NPA Tamworth	Tamworth, NSW	11/02/2025	No
4	Bushwalking NSW	Uki, NSW	24/02/2025	No
5	Wilderness Australia	Sydney, NSW	21/02/2025	No

Submissions from individuals

The individuals that made submissions on the draft review of environmental factors for the Dorrigo Escarpment great walk are listed in Table B.

Table A Individuals that provided submissions

Number	Name	Postcode (if provided)	Date Received	Confidential
1	Turbill, Andrew	2454	25/01/25	No
2	Parsons, Trevor	2430	29/01/25	No
3	Sheahan, Mark	2450	1/02/25	No
4	Bates, Josh	2007	30/01/25	No
5	Rossmann, Nick	2455	1/02/25	No
6	Symonds, Sarsha	2452	5/02/25	No
7	Ward, Bryan		5/02/25	No
8	Pellier, Paul	2453	11/02/25	No
9	McCrea, Dr Nadine	2453	8/02/25	No
10	Howley, Michael	2452	8/02/25	No
11	Gardner, Karen	2454	10/02/25	No
12	Muir, Keith	2780	10/02/25	No
13	McGrath, Mark Andrew	2460	12/02/25	No
14	Walpole, Lou	2453	12/02/25	No
15	Elizabeth	2450	13/02/25	No
16	Sager, Graham	2453	15/02/25	No
17	Rubbo, Ellen	2454	16/02/25	No

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18	Joyce, Stewart	2454	16/02/25	No
19	Mallen, Daniel	2450	17/02/25	No
20	Peters, Des	2453	17/02/25	No
21	Ann	2450	18/02/25	No
22	Matten, Allan	2450	19/02/25	No
23	Edman, Peggy	2454	20/02/25	No
24	Shelhot, Joelle	2455	20/02/25	No
25	Rooney, Nigel	2460	21/02/25	No
26	Tuck, Robyn	2453	22/02/25	No
27	Rooney, Judith	2454	23/02/25	No
28	Steptoe, Helen	2455	23/02/25	No
29	Holmes, Ruth	2453	23/02/25	No
30	Taylor, Kevin	2455	24/02/25	No
31	Radcliffe, Melissa	2453	24/02/25	No
32	Fry, Gary	2454	24/02/25	No
33	Jonno		24/02/25	No
34	McDonald, Geoff	2450	24/02/25	No
35	McRae, Lyn	2448	24/02/25	No