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## **Submission on the NPWS Cycling Strategy Consultation Draft**

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The Central West Environment Council (CWEC) is a regional environment group, representing several local district environment groups in Bathurst, Orange, Lithgow, Rylstone, Mudgee, Dubbo, and Blayney. Thank you for the opportunity to comment on this policy and strategy.

### **Overview**

As a general comment, we feel that both the draft policy and strategy are very broad, allowing much too much leeway in what could occur in our state's precious reserve system. The language should be tighter and perceived threats to the reserves' natural and cultural values should be defended more strongly. It is our opinion that many of the statements provided are actually contrary to the National Parks and Wildlife Act 1974 objectives. Examples are provided below.

CWEC does applaud the idea of using management trails by cyclists. This is an excellent way for small groups to explore parks and better connect with the natural world. Cyclists should be constrained, however, to these tracks or those catering specifically for them and approved by the plan of management. Education in this respect is highly recommended, ditto signage to assist compliance.

There needs to be recognition, however, that there is a significant difference between cycling in reserves as a way to enjoy the outdoors and connect with nature and cycling as a high impact sport, which alienates the use of the area for both those people seeking passive recreation and of course the wildlife that it should be protecting. National parks and reserves are not suited to the latter.

### **Impacts of cycling**

There is lack of recognition in these documents of the serious environmental damage that can be caused not just by illegal tracks, but by new and even so-called 'well designed' tracks, especially when considering large track networks in small areas. This is due to the effect of habitat loss and fragmentation; erosion; and disturbance to wildlife and other users etc.

There is a wide literature on this topic demonstrating the impacts that can occur, especially with the construction of new tracks, legal or otherwise, eg Hardiman et al (2018); Quinn et al. (2010); Runkowski et al. (2014). Vandeman (2004); Wöhrstein, (1998), amongst others. Impacts include effects on the soil and soil biology; siltation and turbidity of local creeks; direct loss of habitat, as well as connectivity resulting in habitat fragmentation; an increase in spread of pest plants (including fungi) and pest animals; changes to vegetation structure and composition; barriers to wildlife movement; risk of collision with wildlife; and last, but not least, a change in the character of the reserve, with alienation of non-cycling visitors, seeking a more peaceful experience.

### **Conflicts with the objects of the NPW Act**

Much of what is proposed appears to be in conflict with the Act outlined in Section 2A under Part 1. These are, in brief:

- (a) the conservation of nature....
- (b) the conservation of objects, places or features (including biological diversity) of cultural value within the landscape....
- (c) fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation,
- (d) providing for the management of land reserved under this Act in accordance with the management principles applicable for each type of reservation.

*Objects a) and b) The conservation of nature and objects of cultural value*

Development of infrastructure, including trails for mountain bikes, is clearly in contravention of these two objectives and should be specifically banned in the policy. The impacts from construction and usage of high impact sports infrastructure are too great to allow in reserves. Most reserves have been gazetted at least in part due to their (till now) lack of disturbance. This means that they are not only hot spots for biodiversity, but but may contain more in site cultural heritage.

Any kind of tacit approval of the continuation of illegal tracks and structures should also be removed from the policy. Much stronger language is needed to ensure closure of these and forget about any kind of self-regulation; it's very unlikely to succeed.

Giving priority to developments that boost 'nature' tourism or local economies over nature conservation are also contrary to the Act and there should be a statement to that effect. There are better alternatives to achieve those aims, eg use of adjacent non-reserve areas, promotion of passive recreation pursuits and development of cultural tourism.

*(c) fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation,*

Small groups, families etc. exploring parks and their natural assets on bikes is one thing and probably would result in an appreciation of nature given adequate encouragement and interpretation. But this policy also permits the possibility of the development of large networks of tracks criss-crossing parks to be used by people for active exercise and extreme competition and events. The former is to be encouraged. The latter is clearly not in line with this objective. Cyclists make up a small minority of visitors and surveys have shown that

only a few of these are interested in nature, so consideration should be given to the other visitors, whose experience may be diminished by large scale events taking place.

*(d) providing for the management of land reserved under this Act in accordance with the management principles applicable for each type of reservation.*

It is not clear to us that this object has been taken into consideration; however, it is our opinion that all types of reserves, not just ‘nature reserves’, contain areas that are environmentally sensitive, otherwise they are unlikely to have been gazetted. Many state conservation areas should be classified as national parks, but have been constrained by the Minerals Department.

In addition to the above, we have concerns about treating e-bikes the same as bicycles; this is probably unwise. These can be faster and noisier than normal cycles. As there are no constraints on power in off-road situations, e-bikes could morph into motorbikes if care is not taken.

## **Other concerns re NPWS Cycling Strategy**

### **PRIORITY ACTIONS**

*1.2 Close unauthorised cycling infrastructure considered to be inconsistent with the strategic track network design for the park and remediate the park environment as resources allow*

This is unacceptable. NPWS should close ALL unauthorised cycling infrastructure as a high priority. Otherwise, you will be rewarding illegal activities.

*4.1 Assess new and unauthorised tracks in accordance with Section 3 of the strategy implementation guidelines. This will be applied equally to all proposals on park.*

Assess for what purpose? Unauthorised tracks must be closed for reasons stated above.

*6.1 Consider opportunities to offer leases under the NPW Act for cycling infrastructure as they are proposed on an individual basis. 6.2 Use our events consent framework and the Parks Eco Pass commercial tour operator licence process to assess the use of park cycling infrastructure for commercial events and tours, and suitable locations that may be promoted for this purpose. 6.3 Identify and prioritise the development and funding of local, regional and nationally significant cycling experiences using the factors for consideration outlined in Table 2 of this strategy.*

If cycling occurs in the parks, it should be managed by the service. Once it is licensed out to tour operators, there will be a loss of control. Commercial events should not be held in parks as they are quite contrary to the objects of the NPW Act (see above). Environmental damage will occur not only due to the activities of the participants, but due to presence of spectators leading to a wider footprint of damage overall.

*7.3 Ensure all new tracks or any unauthorised tracks considered for inclusion into a track network are fully costed for the lifespan of the infrastructure.*

The words ‘or any unauthorised tracks considered for inclusion’ should be removed for reasons stated above. Furthermore, how will costing for environmental and cultural damage

be undertaken, including an increase in pest plants and animals? And the cost of monitoring for these effects will also need to be included.

*7.5 Seek opportunities to offset some of the costs of maintaining on-park cycling experiences, including through cycling hubs, partnerships, sponsorship, user-pay systems and commercial licensing of experiences.*

Surely it would be better to encourage cycling experiences outside parks to avoid the high cost of maintenance, rather than resorting to licensing etc to try and recoup the costs.

*7.8 Seek to reduce the level of inappropriate use of tracks and reduce the creation of unauthorised tracks through consistent signage, community engagement and compliance programs*

This type of language is providing encouragement to those engaged in illegal activity. The language needs to be much firmer and clear.

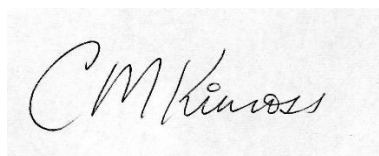
*Table 2 Factors for consideration when prioritising the development of possible on-park cycling experiences*

The factors should first and foremost relate to the conservation significance and cultural values of the reserve under consideration. But that aspect is not mentioned, despite being one of the major objects of the Act.

## **Conclusion**

These documents need to be rewritten with the Objects of the National Parks and Wildlife Act kept strongly in mind. No-one is suggesting that low impact passive recreation via cycling in parks should be denied. This type of activity has always been encouraged. But there is a new agenda here and it is clear that parks are under pressure from minority groups that are looking for free access for the high impact sport of mountain biking at a high cost to the public purse and to the environment. These groups should be encouraged to look elsewhere, eg state forests, private land. The environmental impacts and alienation of reserves, many of which are small, fragile and hot spots for endangered species and communities, as well as cultural heritage, are much too great to be ignored. And the alienation of the character of people's local parks is to be avoided at all costs.

Thank you for the opportunity to comment on the policy and strategy.



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26/1/2022.

## References

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