



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

NPWS Draft Cycling Strategy

30 January 2022

Manager
NPWS Planning Evaluation and Assessment
Locked Bag 5022
Parramatta NSW 2124

email npws.parkplanning@environment.nsw.gov.au

Dear sir / madam

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with around 900 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling its mission the Society advocates for the protection of the Greater Blue Mountains World Heritage Area.

After examining the *Draft Cycling Policy, Cycling Strategy Consultation Draft, Draft Cycling Strategy Guidelines for Implementation* the Society has major outstanding concerns that are not addressed at all or in detail.

- The Society does not support the proposed policy of incorporating unauthorised/illegal tracks into the bicycle track network in some circumstances. This rewards groups and individuals who have created tracks and will encourage further such activities. All illegal cycling routes should be closed and remediated.
- We are concerned that all closures of unauthorised tracks and rehabilitation works are contingent on the availability of resources. (for instance the last point of the draft *Cycling Strategy* Objective 1) National Parks and Wildlife Service [NPWS] needs to be funded adequately to carry out its role in protecting the national park estate.
- The policy accepts funding constraints on enforcement and yet envisages an expansion of cycling. Tracks that are inappropriately sited and currently causing environmental damage should be rehabilitated prior to further tracks being created and or illegal tracks being added to the network.
- The strategy does not appear to prioritise ecological impact from illegal tracks or overuse of existing cycle tracks. The main purpose of the national parks estate is to preserve the outstanding flora, fauna and landscapes. In particular, this impact which includes fragmentating habitat, impacting the hydrological systems,

increasing erosion and sedimentation and facilitating access for feral predators, has not been highlighted. [See for instance the *Cycling Policy*].

- Little recognition that the legislated purpose of the national park estate allows for enjoyment of parks in the context of conserving our biodiversity. While the *Cycling Strategy* quotes the objects of *National Parks and Wildlife Act s2A* including the third object:
 - “c. fostering public appreciation understanding and enjoyment of nature and cultural heritage and their conservation”elsewhere in the documents more prominence is given to providing the “experience” of cycling.
- The documents often talk about cycling generically without separating out mountain bike riding which is known to be associated often with illegal track building and environmentally damaging modification of existing routes.
- The safety of existing park users, particularly walkers and runners, is not well addressed. Walkers are the largest group of park visitors. For instance, shared access of narrow tracks is not realistic with cyclists and other users. *Cycling Strategy* Table 2 *Prioritising cycling experiences on park* lists “Compatibility” as its eighth factor but fails to mention safety or the enjoyment of the park by other users. [The *Cycling Strategy* talks about providing “safe cycling experiences for cyclists” only at Table 1 3.6]

The Society supports

- The promotion of cycling as an environmentally sustainable way of experiencing our national parks and reserves.
- The use of existing management trails by cyclists.
- Carefully designed cycling tracks in locations where they can be constructed and maintained with negligible environmental impact.
- Readily available education about low impact cycling practices.

The Society does not support

- Ignoring the serious environmental damage being inflicted on the reserve network by the construction and use of illegal tracks, jumps and structures.
- The construction of mountain bike track networks in parks or locations with erodible soils, sensitive habitats (including threatened species or threatened ecological community habitats) or little history of cycling use.
- Any suggestion that building mountain bike tracks, jumps or structures without formal approval from NPWS is acceptable.
- Any suggestion that NPWS would approve the use of illegally constructed tracks, jumps or structures in anything but the most exceptional circumstances.
- The use of cycling specific plans which are not consistent with Plans of Management [PoM]. PoMs could identify where new cycling could occur but should not contain broad permission for cycling as the site specific impacts need to be assessed. The public consultative process of Plans of Management changes should be used.
- Creating new cycling locations, “experiences” or “opportunities” should not be decided confidentially and associated environmental impact assessments should be publicly available before approval, [*Policy* para 16, p.3]

- Leases to groups or companies [*Cycling Strategy*]. Leases encourage exclusive use and they could allow activities which meet different standard than the existing reserve it is in. This reduces the central role of park management to protect the environment. Such activities are better located outside parks e.g. in state forests.
- Cross tenure cycling routes which avoid the application of Plans of Management [*Strategy Objective 4* refers to “where appropriate”. The well tried public process contained in park management in NSW should be applied and not undermined.

The following issues should be included

- A clear acknowledgement that major damage has been inflicted on our parks and reserves by clearing native vegetation and disturbing natural soils during the construction and use of illegal mountain bike tracks and structures. It particularly needs to be added to the *Cycling Policy* which is a stand alone document and, because of its brevity, is the document most likely to be read. The *Policy* only has one sentence on this important issue which goes to the heart of NPWS’ responsibility as park managers.
- An unequivocal statement that the use of an illegally constructed mountain bike track is itself an illegal activity.
- Commitment to effective monitoring to detect construction of new illegal tracks or structures.
- Commitment to a comprehensive audit of existing tracks and trails in parks.
- An active program to enforce the law on anyone clearing vegetation, excavating soil and otherwise damaging parks. The NSW government should be prepared to adequately fund the landscapes that it owns and seeks to promote.
- Higher priority given to the compatibility with existing users of a track and managing safety of all users particularly where introducing shared use is being considered. Policies that allow bike riding in national parks particularly mountain bike riding should not impact on walking tracks.
- Where tracks are rehabilitated that NPWS actively maintains the closure of the track and budgets for this follow-up activity. For instance, significant recent work by NPWS to rehabilitate a track that was created to avoid a gate in Woodford is now being undone by the creation of another such track. This location is at the start of the Bedford Creek trail in the Blue Mountains National Park near the trail’s junction with Murphy Road.
- An explanation of how the Mountain Bike Standard Rules fit with existing NPWS standards and rules. [referred to for instance in *Cycling Strategy* Table 1, 4.4 and 5.2]

Issues specific to the Greater Blue Mountains

- Tracks currently in use or being considered should take into account the fragility of many of the rock formations, particularly sandstone platforms. The Plan of Management for the Blue Mountains National Park, the most visited park in Australia, states that “Walking tracks are generally unsuitable for cycling due to the park’s rough steep terrain and erodible soils and the potential for conflict with other visitors.” This is an important recognition of the environmental vulnerability of this park which should be taken into account.

- That bicycle riding not be allowed on any track that has constructed or natural steps due to the possible damage to these steps.
- That riders be encouraged to not ride the last few metres to see the 'view' but instead get off the bike. This behaviour will reduce damage particularly on areas close to management trails.

Thank you for the opportunity to comment on these draft documents.

Yours sincerely

A handwritten signature in black ink, appearing to read "Madi Maclean", followed by a period. The signature is written in a cursive style.

Madi Maclean
Senior Vice President
Blue Mountains Conservation Society