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Manager,
NPWS Planning Evaluation and Assessment
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30 January 2022

Dear Sir/Madam,

RE: Draft Cycling Strategy and Draft Cycling Policy

Thank you for the opportunity to comment on the Draft Cycling Strategy and draft Cycling Policy as it it pertains to NSW's national parks and reserves.

Friends of Ku-ring-gai Environment (FOKE) is a community group working to protect and conserve the natural and cultural heritage of Ku-ring-gai. Ku-ring-gai is surrounded on three sides by National Parks, Lane Cove National Park, Ku-ring-gai Chase National Park, Garigal National Park, and in close proximity to Berowra Valley National Park and Muogamarra Nature Reserve. A high proportion of Ku-ring-gai residents are both users of these national parks as well as volunteers.

As such we are aware of the illegal bike trails that have caused serious degradation to a walking trail, vegetation and threatened ecological communities.

We support the need for a Cycling Strategy and Policy but overall feel these documents present an approach that is too lacking in control mechanisms, unrealistic in terms of resources already stretched within the NPWS and provides little incentive for compliance by Cycling groups.

Our reasons and recommendations are presented below:

1. The draft Cycling strategy and policy give the impression that there is a huge demand for increased mountain bike trails. In fact, the case is the opposite. Essentially mountain bikers are a small cohort with an effective lobbying group that is pushing for more trails to the detriment of other, larger groups of users of the parks, whether bushwalkers, nature lovers etc,
 - a. Using AusPlay statistics, a government agency, only 1.8% of adults claimed to participate in mountain biking.
 - b. The statistics attached to the draft documents highlight that less than half these number would mountain bike once a week, with only 54% of all bikers riding for longer than 2 hours when they do take the time to go. This reduces the numbers to less than 1% of the adult population with the majority only participating a couple of times a year.
 - c. As opposed to mountain bikers, the majority of cyclists utilise the management trails and easily signposted tracks with over 30,000 kms of management trails.
 - d. Section 1.1 Guidelines for Implementation, make it clear that the needs of cyclists are well met, with 'an extensive network of cycling trails suitable for 'leisure; mountain bikers, which make up the largest portion of the mountain biking market.'

2. The Draft Cycling strategy and Policy entail a high workload for NPWS for a small cohort of cyclists, particularly mountain bikers. The objective of 'Providing effective management and resourcing' is unlikely to be met without a significant resourcing increase.
 - a. Bike tracks require a much more concentrated maintenance and monitoring regime to walking tracks to ensure that there is no adjacent damage to vegetation and water run-off that could have negative consequences for the environs and affect threatened ecological communities.
 - b. Additionally, infrastructure costs will need to be considered regarding parking, bike racks, toilets, signage etc.
 - c. Identifying illegal bike trails, then closing these down and remediating the area is already a time-consuming activity that is not currently managing the increases in these illegal trails in many parks.
 - d. By stating that illegal bike tracks will be evaluated as potential legal trails (5.2.1 Guidelines for implementation), will just see their actions as vindicated and the number of illegal trails being created expand exponentially.
 - e. The strategy actively supports proposals for new bike trails within National Parks. Again this will add a high resourcing cost for the benefit of a small proportion of users and to the detriment of other user groups. Any new trails need to be determined by the individual park, and in consultation with local groups, but the control of how any proposed trail is evaluated needs to rest totally with NPWS. Negative publicity of the rejection of proposals will not assist NPWS in building good relationships with the cycling community.
 - f. To date the mountain biking community has not shown itself to be capable of any self-regulation with regard to continuing to address the degradation made by illegal biking trails. We see no reason to believe this will suddenly change, and to rely on the 'stewardship' of this community in meeting National Park goals of conservation of the natural and cultural values is unrealistic and naïve.
3. The objectives of the Draft Cycling Strategy to 'Protect and conserve park values', and 'Support community wellbeing and connection to nature' are not being met within this draft strategy and policy.
 - a. The draft strategy and policy allow too much leverage within the areas that can be proposed for trails, including pristine environments and areas close to aboriginal sites.
 - b. Again and again we see that shared tracks, unless the width of a management trail, are dangerous for walkers or nature lovers as riders speed past. The strategy and policy do not mention the impacts on other users, the majority of visitors, of the parks that need to be addressed.
 - c. The fact that many of the existing tracks are not used frequently should raise the question of why we need more.

Recommendations:

1. We do not believe that our National Parks and Reserves are the most suitable places for mountain bike trails. Aside from a few parks, such as Kosciuszko National Park, the majority of our parks have been developed around the values of conservation of nature, cultural heritage and threatened species. The National Parks surrounding Ku-ring-gai particularly have a strong aboriginal conservation objective. In addition, the topography in our surrounding parks is very steep and intersected by a range of waterways.
2. With regard to cycling trails adding to the Visitor economy, this is unlikely to be realized in Sydney as data highlights the majority of visitors are sourced within Greater Sydney.
3. Aside from the use of roadways and management trails, we recommend that the National parks in the Greater Sydney region do not increase trails to support mountain biking activity.
4. We strongly recommend a much more stringent control of any proposal for new trails. These determinations need to be made by NPWS with clear guidelines of areas that will not be entertained. The current approach is too nuanced and can be manipulated by well-

funded groups. The current process of research and investigation of the protection requirements, site and route suitability need to be undertaken by NPWS.

5. Under no circumstances should illegal bike trails be allowed to become legal trails. This is a recipe for the expansion of illegal trails throughout National Parks.
6. We support the need for NPWS to engage with cycling groups to educate them on the impacts of the destruction of cycling in unauthorized areas.
7. Though the documents state NPWS needs to develop a consistent and firm approach to non-compliant activities, this is inconsistent with supporting illegal tracks to become permanent, as well as self-regulation by bikers, not all of whom belong to clubs. This will only increase non-compliance. A greater use of penalties and fines that already exist under the National Parks and Wildlife Regulation and the Biodiversity Conservation Act 2016 should be applied.
8. We do support the Draft Strategy recommendation to work closer with Councils and land managers to develop cycling trails not predominantly within a National Park.

FOKE also supports the recommendations to the Draft Cycling Strategy and Draft Cycling Policy made in the submissions provided by STEP Inc and the Friends of Berowra Valley.

We look forward to your response and welcome your feedback.

Yours sincerely,

Kathy Cowley
PRESIDENT

cc Mayor and Councillors
cc The Hon Jonathan O'Dea MP Member for Davidson
cc The Hon Alister Henskens SC MP Member for Ku-ring-gai
cc The Hon Paul Fletcher MP Member for Bradfield