



National Parks Association of the ACT Inc.
1960-2010

years of conservation, nature protection and education

Ms Kate Baker
CBRE
GPO Box 1987
CANBERRA ACT 2601

Dear Ms Baker

ACT Trails Discussion Paper

Thank you for your invitation to make a submission on the ACT Trails Discussion Paper (“the Paper”). As you may know, the National Parks Association of the ACT (“NPA ACT”) is a community-based conservation organisation with a fifty year history of working to protect our natural environment through an active outings and workparty program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs. The NPA ACT has a particular interest in how the ACT’s conservation reserves are managed which is why we are keen to comment on policy relating to trails in the conservation reserves

Key Comments

The NPA ACT supports appropriate recreational use of conservation reserves. The ability to commune with nature has significant physical, mental and social health benefits for the ACT. However, in the case of recreation in conservation reserves this should not be at the expense of the conservation values of the reserves.

It is important to note that many of the areas covered by the Paper are conservation reserves which under the overlays of the Territory Plan are classified as National Parks, Nature Reserves and Wilderness. Under legislation these three public land categories must be managed primarily for conservation and other activities such as recreation are subordinate to this primary management objective. It is therefore necessary for any trails policy to recognise this primary objective for such designated areas.

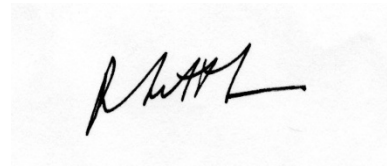
The NPA ACT believes that the Paper and any resulting policy should be part of an overall recreation strategy for the ACT. Such a strategy should address how both public and private land in the ACT can be used to address recreation pressures. It should seek to incorporate both public and private participation in facilitating recreation opportunities. An ACT recreation

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strategy would be a key tool in ensuring recreation pressures on conservation reserves do not lead to the destruction of the key values of these reserves.

The NPA ACT would be happy to discuss any of the issues raised within its submission, either in writing to our office address or through email (noting that the NPA ACT office is manned by volunteers and a daily presence is not able to be maintained. Alternatively, I or Clive Hurlstone can be contacted on 0410 875 731 or 0407 783 422, respectively.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rod Griffiths', is centered on a light-colored rectangular background.

Rod Griffiths

President

13 February 2012

Attachment A

Detailed comments

The following detailed comments are made. These are provided in discussion paper order.

P5) Acknowledgments

The NPA ACT notes that no bushwalking groups or Territory wide conservation groups were consulted although Canberra Bushwalkers, NPA ACT and the Conservation Council ACT Region are mentioned as stake holders in later sections. Such organisations have an ACT-wide perspective on conservation reserve usage providing context to input from some of the more specific or localized NGO groups consulted.

P12) 3 The Strategic context

The opening statement “Whilst fundamentally a recreation resource” fails to take into account that areas in the ACT where trails are primarily for management purposes such as those in wilderness areas and some fire trails.

P13) 3.2 Plans of management.

This section fails to recognise other key environmental drivers covering the extent and placement of trails throughout the ACT. These include the Nature Conservation ACT, the Nature Conservation Strategy and the Federal Environment Protection and Biodiversity Act.

Please note that there is also a plan of management encompassing the former pine plantation area in the Blundells Flat/Condor Creek Catchment.

The NPA ACT strongly supports the statement “Any development, maintenance or use of a trail network will need to continue to be consistent with the location specific objectives of the relevant plans of management.” The management plans for conservation reserves recognise the primacy of conservation and the development, design or maintenance of any trails in these areas must not compromise this primary objective.

P14) 3.3 Population Growth

The NPA ACT supports the following statement “The link between increased population and the need to better resource the management of recreation trails in Nature Parks, Reserves and rural lands has not yet been recognised in policy”. The NPA ACT would also flag that the need to better resource the management of Nature Parks, Reserves and rural lands in general has not been recognized in policy.

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P15) 3.4 Sport and Recreation

The key strategic priorities identified support the NPA ACT's view that a recreation strategy is required for the whole of the ACT which links policies for the development of recreation opportunities on public and non-public lands. The NPA ACT is particularly concerned about the apparent emphasis on conservation reserves to provide recreation opportunities which may compromise their conservation values. It is therefore important to identify how recreation pressures now and in the future can be met through the development of strategies that bring into play all of the ACT and minimises pressure on conservation reserves.

P16) 3.5 Managing impacts on environmental, cultural and heritage values.

The NPA ACT strongly supports the statements made in this section of the Paper especially. "The strategy is intended to complement environmental objectives by facilitating the sustainable management and use of the ACT trails network." This is consistent with the NPA Act's view that an overall recreation strategy is required for the ACT which facilitates the development of recreation opportunities outside of the ACT's conservation reserves and which seeks to maintain the conservation values of these reserves.

P18) 3.7 Economic impacts and tourism

"As a component of structured nature tourism, trails have also demonstrated significant potential to generate revenue for conservation management"

"There appears to be significant potential to capture additional tourist expenditure; however the ability to do so depends on the quality and promotion of the product.

Both of the above statements in the ACT context are speculative – There appears to be no references in this Paper to charging for track use or any reference to licensing fees charged to guided groups by commercial operators. The discussion on the development of the Centenary Trail and its future use does not allude to any direct revenue streams – in fact it is likely there will be significant extra expenditure by Parks and Conservation service. Economic activity generated by interstate visitors using trails/tracks in the ACT should be comprehensively surveyed to ascertain actual visitation/usage levels. There are already suitable organized recreation activities such as Mont 24 hour, Canberra International Walking Weekend, major Equestrian events and major Orienteering or Rogaining events which could be surveyed to gain some solid figures on economic benefit.

P20) 3.9 Transport.

The NPA ACT agrees that within the urban- reserve interfaces bicycle paths provide cyclists and walkers with alternate routes to work or study.

P22) 4.3 Recreational walking and running

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It should be recognised that the NPA ACT also has an extensive walks program.

5 Key issues.

P28) 5.1 Inventory of trails.

There are restricted access (closed to private vehicles) roads and fire trails in Namadgi National Park, Tidbinbilla Nature Reserve and the former pine plantation sites in the Cotter Valley and Corin Forest which are for the management of the conservation/catchment estate. It is well known that many of the legacy roads from former pine plantations are causing catchment problems (erosion, turbidity). The long process of remediation and network rationalization of these roads should have a higher priority than recreational use.

P30) 5.2 Concentration of users.

The statement that “urbanization is limiting the areas which may be used” (for recreation) is lacking any supporting evidence. Which “recreational trails” have been removed? Is this a reference to tracks in pine forests now being replaced by Coombs and Wright which are adjacent to a very large dedicated recreation development, Stromlo Forest Park?

P 30) 5.3 Trail sharing.

The claim that “increasing trail sharing will be essential to ensure all users have access to this important recreational resource” is very broad. The statement does not take into account those trails where the sharing between certain interest groups could have safety implications nor does it take into account recreation that would not be suitable for conservation purposes. For example, dog walking in certain environmentally significant areas would be inappropriate no matter who it is shared with. For these and similar reasons the NPA ACT would strongly oppose the opening of existing walker’s only tracks in the ACT conservation estate to bikes or horses.

P31) 5.3 In the section on “Solutions suggested by users...”

The NPA ACT supports education, signage, trail design, and limiting access. Segregation of users/restricted access at specific times (during events) could be considered. On the proposal for the “Establishment of safety zones”, this may indicate that those sections of trails are not suitable for use except by walkers.

P32) 5.4 Limited connectivity

The NPA ACT supports improved connectivity of trails where this does not lead to adverse impacts within conservation reserves or other areas of environmental significance. Where connectivity involves proposals to construct new sections of trail within the ACT conservation estate the NPA ACT would expect full public consultation.

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P32) 5.5 Reporting of issues.

The NPA ACT supports the proposal to improve the methods/systems for reporting track issues.

P33) 5.6 Provision of maintenance.

Organisations planning events should consult the relevant land managers about the availability of venues well before the preferred date. A carefully scheduled maintenance program can be disrupted by natural events, so alternative venues may need to be used

P33) 5.7 Proliferation of the trail network

The NPA ACT supports close consultation between greenfield developers and the responsible ACT government agency on the development of new recreation trails and the adequate resourcing of trail management by the ACT Government and also the adoption of a robust standardised method for trail auditing. The NPA ACT sees these as vital ingredients of an overall recreation strategy for the ACT.

P34) 5.8 Impacts on ecological and cultural values.

In conservation areas in the ACT there is a legislative requirement for the protection of ecological values to have a higher standing than the provision of recreational opportunities.

P35) 5.9 Limited access to trails information

The NPA ACT Supports improved access to information on trail status – a TAMS website would fit the bill. In addition, the ACT could consider sharing trail information with the Conservation Council's Biodiversity Mapping project, a community based GIS system.

P 35) 5.10 Lack of usage data.

The NPA ACT supports the gathering of trail usage data by TAMS. A consideration in how this is to occur is where the funding will come from, as many areas in TAMS have limited budgets stretched across many priorities.

P37) 5.11 Staging events

The NPA ACT would support a requirement for significant events to be significant contributors to set up, temporary infrastructure and rehabilitation costs. Apart from parking and trail surfaces the event organisers should be responsible for providing toilets, watering points etc. Trail surfaces cannot be guaranteed and the event organisers should take this into account when planning an event.

P 38) 5.12 Public access and Government liability

The NPA ACT supports the ACT Government policy on public access and Government liability.

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P38) 5.13 Unexplored tourism potential.

The NPA ACT believes that the tourism potential of the ACT is continually explored. It has seen many proposals and initiatives put forward. While not opposed to these per se, it is important in respect to conservation reserves that the environmental values of these areas are not eroded through over-visitation. Again, it is important to plan recreation on an ACT-wide scale.

P 39) 5.14 Management structure

The NPA ACT supports budgetary allocation for the management of trails reflecting the importance of trails as a recreation resource.

P40) 5.15 Protection of the network.

The NPA ACT supports the identification of significant trails in the Territory plan.

6 The Proposed Strategy

P41) 6.1 Time Frames

The NPA ACT supports the proposal.

P41) 6.2 Implementation

The NPA ACT supports the proposal.

P41) 6.3 Key Values

The NPA ACT supports the proposal.

P42) 6.4 Vision

While the NPA ACT supports the Vision, it believes that it should also recognise that it should be part of an overall recreation strategy for the ACT. The Vision should also refer to the maintenance of environmental values where trails impact on significant conservation areas.

P 42) 6.5 Delivery of the vision

The NPA ACT supports the use of proposed trail assessment criteria.

P46) 6.5.1 Strategic goals and actions.

This section contains 15 goals and 56 actions to achieve. Comments made by the NPA ACT above should be considered in respect to these goals and actions.

The NPA ACT believes that actions 18 and 19 to achieve the “Facilitate trail based events” goal must be an open and transparent process and should happen early enough before any proposed

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event to permit proper consideration to be given to any potential environmental impacts. The option to change or modify the event location should not be ruled out.

The NPA ACT believes that more discussion is needed in respect to point 3 “Establishment of safe zones” in action 47 to achieve the goal “Recognize the needs of different users”. The NPA ACT raised concerns about this above in discussion of Section 5.3. Sections of the route for the Centenary Trail are proposed to be multiuse new or redeveloped trails 1.2m wide –for both pedestrians and cyclists. There will not be enough room for cyclists to pass pedestrians or other cyclists without slowing down to a walking pace.

The concept of “Safe Zones” seems to be introducing a hierarchy of users. Any proposed “Safe Zones” should be subject to full public consultation.