



NSW NATIONAL PARKS & WILDLIFE SERVICE

Illawarra Escarpment Mountain Bike Strategy Public Exhibition Report



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Introduction

Period of exhibition



Number of submissions



The National Parks and Wildlife Service (NPWS) and Wollongong City Council (Council) prepared the Draft Illawarra Escarpment Mountain Bike Strategy (Strategy) in recognition of the demand for a sustainable approach to mountain bike recreation on the Illawarra escarpment.

The primary emphasis of the Strategy is to deliver safe, sustainable recreation for a broad range of mountain bike riders consistent with the Illawarra Escarpment State Conservation Area (IESCA) Plan of Management. It identifies a potential mountain bike trail network of 82.2 kilometres on the escarpment, notwithstanding the final design of the network, including detailed planning, economic and environmental assessments and management reviews.

This public exhibition report summarises public feedback on the key themes raised in the public exhibition period, and outlines NPWS and Council's joint response to submissions.



Photo Mount Keira, Illawarra Escarpment State Conservation Area. Dan Irwin

Background

The demand for mountain bike riding and the construction of the illegal tracks on the Illawarra Escarpment has rapidly increased over recent years. The Illawarra escarpment presents a complex range of issues such as steep slopes, instability of soils, sensitive rainforest vegetation, Aboriginal cultural heritage values, complex land tenure boundaries and a history of community interest in conservation and recreation use.

In July 2015, in recognition of these issues, the then Minister for Environment endorsed a multi-agency stakeholder working group to develop a mountain bike strategy to identify sustainable mountain bike opportunities across the Illawarra Escarpment. The Working Group was appointed in 2015 and consisted of representation from Wollongong City Council, Destination Wollongong, Illawarra Mountain Bike Alliance, University of Wollongong and National Parks and Wildlife Service.

The Working Group engaged a consultant, Dirt Art who specialises in mountain bike track design and development. In 2018 a Feasibility Study was produced that included a mountain bike network across all land tenure of the Illawarra Escarpment. The report is commercial in confidence and was not released to the public.

The next stage of the project was to produce a Concept Plan that could be shared with the public for feedback. Dirt Art produced the Concept Plan with input from the Working Group. Based on the plans, Wollongong City Council and National Parks and Wildlife Service developed the Draft Illawarra Escarpment Mountain Bike Strategy which included information from the feasibility study and concept plan, environmental assessment and preliminary cultural heritage assessment.



Figure 1 Stages of the project

Consultation process

The Strategy was on public exhibition from 30 October 2018 to 21 December 2018. The original closing date of 10 December 2018 was extended by 10 days due to a high level of public interest.

The Strategy was available on the former Office of Environment and Heritage website and at multiple locations in hard copy.

Submissions

A total of 956 submissions were received.

A broad range of stakeholders provided feedback, including NSW Government, non-government organisations (e.g. Aboriginal stakeholders and environmental groups) and private individuals. The majority of submissions were made via the website. A large proportion of submissions were pro forma responses.

The high volume and varied sources of the submissions confirm a high level of interest in the proposal.

Overview of public exhibition responses

The National Parks and Wildlife Service (NPWS) and Wollongong City Council (Council) reviewed all submissions. The submissions addressed a wide range of issues that have been summarised under six key themes for this report.

1. Trail network and scale of proposal
2. Infrastructure and services
3. Development of the Strategy
4. Impact on the community
5. Environmental and cultural heritage impacts
6. Future management

The summary is not intended to be exhaustive, however, all major comments and issues have been analysed and included.

Trail network and scale of proposal

Submissions from riders broadly supported the proposed network's ratio of beginner, intermediate and advanced trails. Advanced riders requested a higher volume of black trails, particularly in Stage 1, to address demand and deter the development of illegal trails. They also sought further information on whether the Mount Keira Summit Park would form part of the network. The large volume of supportive rider submissions suggests a high demand for mountain bike facilities for riders of all styles and abilities.

The safety, environmental and community benefits of well-designed and built trails was widely acknowledged and supported in feedback, to protect the environment, ensure the safety of riders and support competitive events. Rider feedback also encouraged trail design and standards that would accommodate large competitive events and withstand wet-weather use. Some submissions suggested linking Balgownie with Mount Keira and encouraged planning beyond Stage 3 of construction.

Most rider submissions accepted that some existing trails would be closed for safety or environmental reasons. More information was sought about how track closures and rehabilitation would occur.

Submissions opposing the Strategy objected to the scale of mountain bike tracks proposed. Some consider trails on steep slopes, rainforest, important wildlife habitat, remote areas or near walking tracks as unsustainable or unsuitable. Others suggested that mountain bike trails should be restricted to existing NPWS management trails in the reserve, including fire trails.

Feedback from walkers contend that the planned volume of bike trails far exceeds walking tracks. Some submissions objected to the density of trails at Mount Keira and suggest the scale should be reduced. Concerns were also raised as to whether illegal trail development would continue despite the investment in a formal riding network. Some submissions also suggested that alternative sites outside the state conservation area should be investigated.

Infrastructure and services

Submissions that both supported and opposed the Strategy raised concerns about access and amenities. This feedback highlighted gaps in the infrastructure and services required to support the proposed mountain bike network.

Access was raised as a major issue. Supportive submissions sought further information about public transport links, shuttle uplift services, and cycle lanes to alleviate demand for parking. Riders also requested ongoing use of public roads and fire trails for uplift, and suitable access for spectators. Emergency access must be considered in any proposal. Opposing submissions highlighted tensions in relation to parking, traffic and general congestion. This feedback suggested a lack of detail about how to manage these issues undermined the Strategy.

Submissions additionally flagged the need for amenities such as toilets, litter bins and visitor information at access nodes. Opportunities for camping and the development of a smartphone application, including trails maps and other information, were also suggested.

Development of the Strategy

Submissions that opposed the Strategy raised issues around the consultation process and its consistency with legislation and other NSW Government strategies. These submissions stated the Strategy is a product of mountain bike and commercial interests, with little input from other interest groups such as park users, neighbours, environmental groups and the Aboriginal community.

Some responses perceived the Strategy as inconsistent with the *National Parks and Wildlife Act 1974*, the aims of the Illawarra Escarpment State Conservation Area Plan of Management and Council's Mount Keira Feasibility Study. A few respondents raised concern about a potential conflict of interest on the part of Dirt Art, who were engaged by NPWS and Council to design the mountain bike concept plan and helped to develop the Strategy. Further information was sought on economic and environmental assessments to confirm the feasibility of the Strategy.

Impact on the community

There was significant support for the proposal given the social and economic benefits a mountain bike network would bring to the region. The most commonly cited benefit was the potential regional economic opportunities for tourism and associated businesses, including the creation of local jobs. Many submissions cited international and interstate examples of sustainable mountain bike networks and their positive impact in reviving local economies.

The health and recreation benefits were strongly advocated. A number presented anecdotes of significant personal gains in health and wellbeing due to mountain bike recreation. Supporting young people to engage in physical activity was also seen as a significant benefit, notably in submissions from parents and children who ride as a family activity.

Criticism focused on adverse impacts on, and potential conflict with, other park visitors and neighbours due to the locations and intensity of the proposed development. Respondents contend that the proposal would deter or displace visitors, such as walkers and fauna enthusiasts, and that mountain biking is unsuited to areas used for passive recreation and the appreciation of nature.

Feedback inferred that existing conflict between users would be exacerbated by the Strategy. Many objected to intersections with walking tracks and the proposed proximity of mountain biking and walking tracks. They argued that the final trail network should ensure the separation of walkers and cyclists. Issues such as noise, privacy, security, rider conduct and numbers, property values and enjoyment featured prominently. This feedback suggested a lack of detail about how to manage these issues undermined the Strategy's feasibility.

More consultation was requested to develop a more inclusive plan.

Environmental and cultural heritage impacts

Submissions supporting the Strategy maintained that formal mountain bike trails would produce better environmental outcomes, by deterring the proliferation and use of illegal trails. Some feedback also argued that the impact of mountain biking is low compared to other activities on the escarpment, for example, mining. Involving riders in the development and management of trails, thereby fostering pride and ownership, was seen as a positive way to boost compliance and protection of the environment.

Submissions opposing the Strategy cited the proposal's impact on plants, animals, ecosystems and ecological sustainability of the reserve. This feedback argued the Strategy itself creates an unrealistic expectation that mountain bike use is ecologically sustainable. They argued the Strategy does not account for the long-term impact of the proposed network (during the construction phase and ongoing) on the natural values of the reserve including wildlife and their habitats, vegetation, rainforest, bushfires, weeds, soils and slope stability. A few respondents noted that, in comparison with technical trails, climbing and flow trails have a high environmental impact.

Opposing submissions argued that the proposed trails rewards unauthorised mountain bike developments and the environmental damage caused at the expense of low-impact users. Justification was sought for the nature, scale and intensity of the proposal, given the small size and important natural and cultural values of the reserve. Public exhibition of relevant cultural and environmental assessments was requested.

Submissions that did oppose the Strategy identified potential impact on Aboriginal cultural heritage values. Responses from the Aboriginal community stated that adequate consultation did not occur and that the cultural significance of Mount Keira (Djera) and Mount Kembla (Djembla) was overlooked. A number of respondents, including Aboriginal groups, oppose any mountain biking on Mount Keira. This feedback sought increased compliance action against existing trails. More consultation was requested to ensure the protection of Aboriginal cultural heritage. Submissions suggested that alternative sites outside the state conservation area should be investigated to mitigate environmental and cultural heritage concerns.

Some submissions also noted the existence and importance of mining heritage on the escarpment.

Future management

Submissions on the management of the proposed network sought clarity around governance, resourcing, compliance, delivery timeframes, management and maintenance costs.

Supportive submissions suggested that involving riders and local businesses in trail management would be necessary to manage trails and ensure compliance. Some cited intrastate examples where this approach operates successfully. Opposing submissions argued that self-regulation would not ensure compliance and that active policing and auditing of trails would be required, possibly including fines. Further information was requested about how the network will be managed and the roles of NPWS and Council.

A large proportion of submissions questioned the resourcing available to construct and maintain the tracks. Supportive submissions suggested potential funding sources, including user-pays arrangements, a non-profit partnership between NPWS, Council and users or via club events and competitions. Some submissions feared commercial management of the trail network would have negative outcomes for other users and the environment. Submissions from walkers argued that funding for the Strategy should be contingent on equal resources being allocated to walking tracks and other visitor facilities.

Opposing submissions viewed the Strategy as diverting resources away from other management activities and facilities. Others maintained that the upgrade, closure or rehabilitation of illegal trails should be costed first. The view that management resources need to be guaranteed up-front was expressed in many submissions. Many submissions held that mountain bike trails should not be funded until the NPWS is sufficiently resourced to locally manage its primary functions.

Submissions sought further information on the management of overcrowding, safety, incidents and liability, given the growing demand for mountain bike recreation in the region, high risk ranking of mountain biking and the safety risk to walkers and others.

Some questioned whether cessation of all mountain bike use on the escarpment was considered.

Management response

Trail network and scale of proposal

Delivering sustainable trails and servicing riders of all abilities are key goals of the Strategy. The final design of the network, including the scale, location and ratio of trails, is subject to detailed planning, economic and environmental assessments and management reviews. The aim of staged implementation is to allow potential impacts to be monitored and amended if needed. Capacity for events and the feasibility of all-weather trails will be addressed during the detailed planning and design stage.

NPWS and Council will continue to explore alternative trail locations, providing they meet sustainability, access and land ownership criteria. Existing vehicle access routes and NPWS management trails will also be considered. Cycling on fire trails is already permitted under the IESCA Plan of Management.

NPWS and Council consider that well-designed and built trails will deter continued illegal trail development and use. Trails that do not meet acceptable safety or environmental standards need to be closed noting closure and rehabilitation of trails is subject to funding availability. The identified network aims to avoid sensitive areas and walking tracks.

A walking track network of equal volume is proposed in the Illawarra Escarpment Walking Tracks Master Plan (NPWS 2006). Implementation of the Illawarra Escarpment Mountain Bike Strategy and the Walking Tracks Master plan is subject to funding and must satisfy cultural and environmental assessments.

Infrastructure and services

Council exhibited a Draft Plan of Management for Mount Keira Summit Park concurrently with the Draft Illawarra Escarpment Mountain Bike Strategy. Maintenance and upgrade of parking facilities (including drop off and pick up areas for buses and coaches, taxis and commercial operators), improved or new toilets, a demountable or permanent café or restaurant and food vans or pop-up food services were included items. The community feedback on the exhibition period will be reported back to Council.

Opportunities for improving cycle infrastructure links to train stations and nearby major attractors are being considered as part of Council's review and update of its Bike Plan. Mount Keira Road will continue to be maintained as a public road and is recognised as a popular cycling route. Cycling on fire trails is permitted under the IESCA Plan of Management.

Rider, spectator and emergency access will be provided for in the final network design.

Pending finalisation of the network design, NPWS, Council will develop visitor information and install relevant signage.

Development of the Strategy

The Strategy was developed by NPWS and Council. Input was provided through Governance and Working Groups consisting of NSW Government agencies, tourism bodies, mountain bike groups and landowners. Environmental consultants had also guided the development of the draft Strategy.

NPWS and Council developed a constraints map to inform mountain bike trail alignment (trail routes). The constraints maps drew on data from environmental and other studies on biodiversity, conservation assessments, environmental disturbance, soils and slope stability. The Strategy prioritises alignments that utilise disturbed areas and avoid known constraints. Steep terrain, areas with extreme soil erosion potential, lands prone to landslides, rockfalls or flooding, and areas of high conservation importance were avoided.

The Strategy was also informed by preliminary environmental studies, Council's mountain bike feasibility study and Dirt Art's concept plan. Dirt Art is a company that specialises in mountain bike trail design. Dirt Art was engaged by NPWS in accordance with NSW Government procurement guidelines.

The IESCA Plan of Management was approved in September 2018. It is a statutory document that provides for the development and implementation of a mountain bike strategy, subject to public exhibition of the Strategy and an environmental impact assessment.

The Strategy is consistent with the NSW *National Parks and Wildlife Act 1974*.

Impact on the community

The aim of staged implementation is to allow the impacts of the proposal, including conflicts with other park users and the community, to be monitored. Mountain bike use will not be formalised where conflicts with other values cannot be managed. Safety of visitors will be managed through physical separation of cycling and walking trails, maps and signposting, and design of trails, exits and intersections.

The final network design will provide for beginner and family trails up to intermediate and advanced trails. Strategies to manage visitor numbers, including parking controls, will be determined during the detailed planning and design stage. NPWS and Council consider that attracting a broad range of riders and involving riders in trail management will deter poor conduct by the minority.

The Strategy aims to minimise impacts on nearby residential areas. NPWS and Council will liaise with nearby residents if projects are developed in nearby areas.

Environmental and cultural heritage impacts

There is existing and growing demand for mountain bike recreation in the Illawarra. This is evidenced by the large number of supportive submissions and the proliferation of illegal trails. Prohibiting mountain bike recreation on the escarpment is not considered by NPWS and Council to be feasible. The primary emphasis of the Strategy is to deliver safe, sustainable recreation on the Illawarra escarpment. NPWS and Council consider that sustainable mountain bike recreation can occur on the escarpment and that sustainably-designed and built trails will provide better environmental outcomes than illegal trails.

The final design of the trail network will be subject to comprehensive environment assessment under Part 5 of the NSW *Environmental Planning and Assessment Act 1979* (also known as a Review of Environmental Factors or REF). This assessment will assess the impact on community, cultural heritage, biodiversity, economic, slope stability and other impacts.

For environmental reasons, some types of trail and the use of machinery might not be acceptable in some parts of the state conservation area.

NPWS and Council acknowledge the cultural significance of Mount Keira (Djera) and Mount Kembla (Djembla) to Aboriginal people. NPWS will continue to explore possible partnerships with the Aboriginal community and alternative trail locations, providing they meet capacity, access and land ownership criteria.

Future management

The governance arrangements and roles of NPWS and Council in managing the trail network have not been determined. NPWS and Council are exploring all options, including ways to involve mountain bike organisations, local businesses and riders in trail management and compliance. Penalties for offences identified within national parks legislation and regulations apply to activities within the state conservation area.

The implementation of the Strategy and timing of the closure and rehabilitation of illegal trails is subject to funding.

NPWS and emergency response organisations manage emergencies and other incidents in accordance with established procedures, including Local Emergency Management Plans and NPWS guidelines.

Next steps

Stakeholder consultation

NPWS will continue to engage with affected stakeholders to finalise the Strategy. Once approved, the Strategy will be implemented in stages to allow the impacts of the proposal to be monitored. Implementation of the final Strategy is subject to available funding.

The Illawarra Escarpment Mountain Bike Governance Group will continue, with membership to include NPWS, Council and Regional NSW.

An Illawarra Escarpment Mountain Bike Advisory Group will also be established. Membership will reflect a broad range of business, risk and technical skills to provide advice on Strategy development and management approaches. Aboriginal stakeholders will be represented on this group. The Advisory Group will report into the Governance Group.

National Parks and Wildlife Service, Council and Regions NSW will invite representatives from Destination Wollongong, Illawarra Local Aboriginal Land Council, Illawarra Mountain Bike Alliance, Illawarra Escarpment Alliance, Illawarra Wingecarribee Alliance Aboriginal Corporation, Destination Sydney Surrounds South, National Parks Association, South 32, WaterNSW, Office of Sport and University of Wollongong.

Assessment process and final Strategy

Before the strategy is finalised and works start, NPWS and Council must have completed:

1. A comprehensive and detailed environmental assessment to determine the impact of the proposal when the proposed trail network is finalised. Activities within NPWS reserves are assessed under Part 5 of the NSW *Environmental Planning and Assessment Act 1979*. The final design of the trail network is subject to this assessment and may be refined or changed to reduce the environmental impacts.
2. NPWS and Council need to determine the best operating model, given the trail network goes across both NPWS and Council land. The arrangements must properly address risk and maintenance of the trails and facilities.

Planning assessments of the final Strategy is subject to available funding.

Work that is undertaken for the project will be accordance with NSW Government Procurement Policy Framework to ensure an equitable process is followed that guarantees the best outcomes for the community.



Figure 2 Assessment process