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## Cycling Strategy Feedback

Thank you for the opportunity to give feedback on this strategy. The aim of Friends of Berowra Valley (FoBV) is to protect the natural landscape, heritage and biodiversity of Berowra Valley while making the valley more accessible to the community.

Our main area of concern with this strategy is it will fail to control the damage that is being caused by unauthorized mountain bike tracks throughout the National Park. In its current form it has the potential to exacerbate this issue. We would like to see resources dedicated to removing and restoring unauthorised tracks. After years of trying to find a common ground with mountain bikers it has become apparent that they have no interest in the fundamental purpose of a National Park which is to preserve and conserve Australia's unique fauna and flora.

Our [position paper](#) highlights our support for a balance of recreational opportunities to be offered to park users to enjoy the natural beauty that exists in all National Parks. FoBV do not support recreation activities that lead to a degradation of environmental values.

FoBV believe no mountain bike tracks should be allowed in Endangered Ecological Communities, Biobanking sites, Aboriginal and Heritage sites or in any healthy bushland. In National Parks mountain bikes should be confined to park edges, for example asset protection zones, permitted on management trails and any new trails should be confined to edges and highly degraded sites with low resilience.

FoBV support the safe use of mountain bikes for recreation on management trails. During this activity there is plenty of opportunity for interaction with family and friends as well as the environment. FoBV does not support the sport of mountain biking in most bushland because:

- It is not suitable for the broader community and therefore excludes other users, effectively quarantining areas of bushland for the needs of a particular sport. The focus of mountain biking is on technical difficulties and challenges. The comparison of a family riding bikes on a management trail to the sport of mountain biking is like comparing casually kicking a ball in a back yard to premier grade football codes.

- The dissociation of riders from the environment increases as trail difficulty increases. Advanced trails are too fast, too technical and too challenging for riders to do anything other than focus on the immediate trail and exclude any enjoyment of the biodiversity.
- Mountain bike trails are damaging to the natural environment and the damaging impact of mountain bike trails increases with their difficulty, for example:
  - increasing steepness and sharpness of switchbacks and berms
  - an increase in the difficulty of unavoidable obstacles, e.g., roots, rocks, drop offs, jumps
  - challenging climbs
  - super steep descents
  - increased speed which endangers fauna
- Switch backs, such a prominent feature of most tracks, chop the bushland into fragments and therefore reduce the conservation value of an area far more than the actual cleared area would indicate. Short cuts between track levels add to the erosion hazard and damage to the bushland.

Providing mountain bike trails is the same as providing facilities for other sports – it requires bushland to be cleared and provides exclusive use to a small number of users. The sport of mountain biking does not depend on the presence of bushland. Trails are often developed on degraded areas such as quarries, mines, tips, state forests and farmland.

This strategy has the potential to control a deeply concerning issue within many National Parks. The integrity of our bushland is important for so many species that can be found nowhere else in the world. Surely the whole point of a National Park is that these species have priority over a few mountain bikers who will no doubt move on to another place once they have completed damaging the park and got bored with the area. The tragedy is that our native flora and fauna have nowhere else to go, they will be lost forever.

# **Our Feedback on the Draft Cycling Strategy Guidelines for Implementation**

## **2.2 Commercial Opportunities**

(p8 Draft Cycling Strategy Guidelines for Implementation)

### **Our Feedback**

FoBV reject commercial opportunities and leases as they are inappropriate for this activity. Commercial leases must be limited to facilities that pass the "property leasing guidelines" and are licenced to operate commercial activities in parks. FBV rejects these in BVNP as they are absolutely inappropriate for the small national parks and nature reserves that line the valley. Degradation of the natural environment and user conflict would be extreme. Any lease or commercial activity must be accessible to all, e.g. a coffee shop, not to one specific sport. Therefore we reject leases, commercialisation and cycling events (2.5) and commercial cycling tours (2.6) in Berowra Valley's parks.

## **Assessing and enabling cycling experiences on park**

(p16 Draft Cycling Strategy Guidelines for Implementation)

### **Our Feedback**

There is no reason to expect the Plan of Management to be changed if cycling is not permitted.

## Assessing and enabling cycling experiences on park



# Appendix A. Cycling market overview

(p27 Draft Cycling Strategy Guidelines for Implementation)

## Our Feedback

Your draft strategy estimates that there are 82,000 mountain bikers in NSW or 1-3.3% of the population of NSW. However your report fails to show a comparison with walkers. Nationally walking is the number 1 physical activity whereas cycling is only number 5.

## Top 20 participation sports and physical activities

1. Walking (Recreational) 8,783,064
2. Fitness/Gym 6,874,541
3. Swimming 4,505,531
4. Running/Athletics 3,334,693
5. Cycling 2,359,660
6. Football 1,767,288
7. Tennis 1,202,011
8. Bush walking 1,189,493
9. Basketball 1,017,968
10. Golf 1,015,150
11. Yoga 984,362
12. Australian Football 913,668
13. Netball 901,903
14. Cricket 798,618
15. Dancing (recreational) 688,293
16. Pilates 585,706
17. Surfing 508,015
18. Gymnastics 489,058
19. Touch football 464,721
20. Martial arts 316,826

(Referenced from [https://www.sportaus.gov.au/media-centre/news/australias\\_top\\_20\\_sports\\_and\\_physical\\_activities\\_revealed](https://www.sportaus.gov.au/media-centre/news/australias_top_20_sports_and_physical_activities_revealed) )

## From our Mountain Bike Trail Position Paper

We acknowledge the findings of the Active Living Hornsby Strategy, 2015, that found walking for exercise had the highest level of participation (23%) while cycling of all types had a participation of 6.5%. Much of this cycling would in fact be road cycling rather than mountain bike riding.

## From the Berowra Valley National Park Draft Plan of Management

Bushwalking is the most popular physical activity undertaken by the NSW population (34 per cent) and by visitors to NSW national parks (55 per cent) (Australian Sports Commission 2011; Roy Morgan 2011). Bushwalking allows visitors to be in close contact with the environment and can increase understanding and enjoyment of parks and the environment generally. There are also significant health benefits associated with walking in a natural environment setting compared to that of an urban area. Research indicates that walking in bushland areas has beneficial health effects on

immune system function and stress levels as well as heart health and blood pressure (HPP Central 2013).

The planning area provides a range of bushwalking opportunities with varying degrees of social interaction, physical challenge and self-reliance and within a number of environmental settings. The highly scenic bushland and well-developed tracks of Berowra Valley National Park attract local, regional and international bushwalkers. Extensive works to provide bushwalking tracks and facilities at track heads (such as toilets, signage, and water and picnic tables) have made Berowra Valley National Park a major focus for bushwalking activities within the Sydney region.

## Appendix B. Site suitability assessment

(p31 Draft Cycling Strategy Guidelines for Implementation)

### Our Feedback

Table 1 needs to be clearer as it has the potential to save a lot of unnecessary work and in its current form it is too hard to understand. The Landscape Context Assessment and Site Character Assessment are to be determined by Table 1. Table 1 has three parts – Physical Character, Social Character and Management Character. The diagram below determines if a Multi-criteria assessment is required but it is not clear if Physical and Social Character mean Site Character and Management Character means Landscape Context?

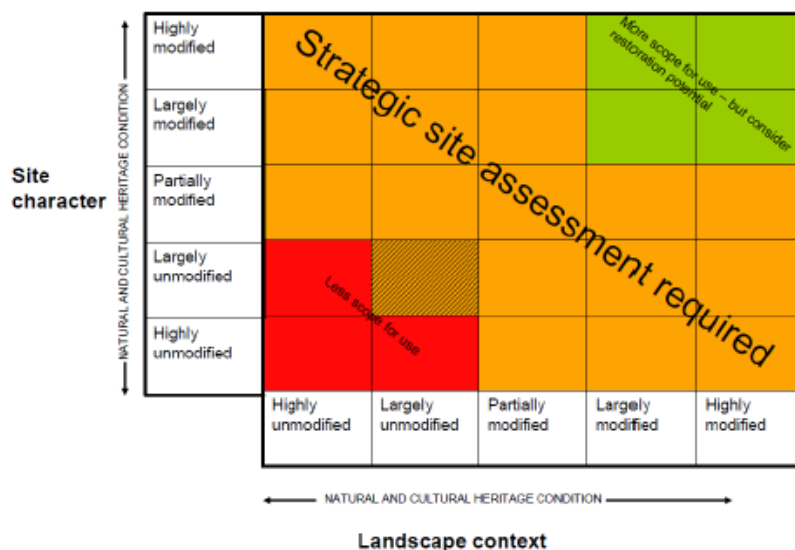


Figure 4 Site suitability matrix

From [Sustainability Assessment Criteria for Visitor Use and Tourism in New South Wales National Parks](#).

# Appendix C. Multi-criteria assessment method

(p36 Draft Cycling Strategy Guidelines for Implementation)

## Our Feedback

We query how the scores and buffer distances in Table 3 have been derived and the criteria, qualifications and expertise of authors? How have they managed to create a strategy that does not reflect the NPWS stated values which are to protect and conserve park values:

“Section 2A of the National Parks and Wildlife Act 1974 (NPW Act) outlines the 4 key objects of the Act, that the management of our parks must be in accordance with. These are:

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

Table 3 should ensure that tracks are limited to APZ or degraded edges with no resilience. Even then it must ensure that it does not impact Aboriginal and Heritage sites, EECs or significant landscapes, threatened flora or fauna, areas where connectivity is important, areas where erosion is a problem and areas impacting watercourses.

## A Better Approach

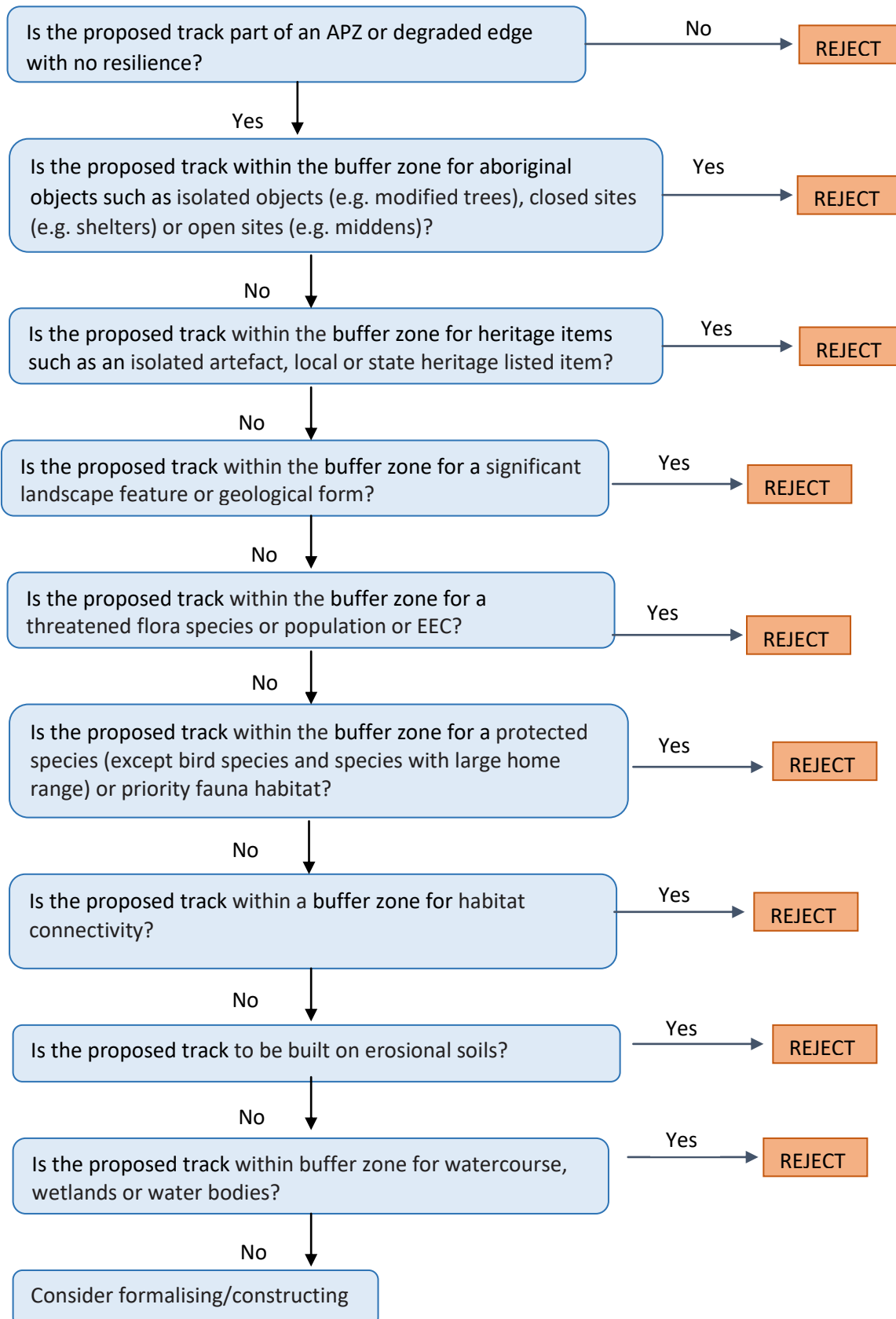
Criterion 1 – Is the route rejected by The Simple Decision Tree decision tree? No, then apply Criterion 2 and 3.

Criterion 2 – Routes facilitate an enjoyable and safe visitor experience.

Criterion 3 – Construction and maintenance costs are reasonable and sustainable.

Currently you are giving each Criterion equal weighting. This is a very dangerous approach. If a mountain bike trail fails criterion 1 then it should be an automatic fail. To then analyse it based on Criterion 2 and 3 makes no sense, it just opens the possibility for a track that is not appropriate to become authorized.

## A Simple Decision Tree





## Recent Experiences in Berowra Valley National Park

A camp was set up in the park with the intention of creating a track. This is not short term activity but a desire to create a significant amount of damage over the long term.





An unauthorised mountain bike track has been created through excellent bushland, accessed near 42 The Crest Hornsby Heights. The track is very near a management trail, the damage to the bush is extensive. This area is home to many species according to the Atlas of Living Australia there are 183 animal species and 426 plant species.

Showing records for: **26 The Crest, Hornsby Heights NSW 2077, Australia**

Display records in a 1 km radius View selected records Download

Group	Species	Common Name	Scientific Name	Records
All species	610	1. Common Brushtail Possum	<i>Trichosurus vulpecula</i>	25 ^
<b>Animals</b>	<b>183</b>	2. Common Ringtail Possum	<i>Pseudocheirus peregrinus</i>	23
Mammals	21	3. Common Froglet	<i>Crinia signifera</i>	19
Birds	85	4. Tawny Frogmouth	<i>Podargus strigoides</i>	17
Reptiles	15	5. Kookaburra	<i>Dacelo (Dacelo) novaeguineae</i>	16
Amphibians	5	6. Noisy Miner	<i>Manorina (Myzantha) melanocephala</i>	16
Fishes	0	7. Rainbow Lorikeet	<i>Trichoglossus haematodus</i>	16
Molluscs	1	8. Sulphur-crested Cockatoo	<i>Cacatua (Cacatua) galerita</i>	15
Arthropods	54	9. Brown-striped Frog	<i>Limnodynastes peronii</i>	14
Crustaceans	2	10. Pied Currawong	<i>Strepera (Strepera) graculina</i>	14
Insects	38	11. Red-bellied Black Snake	<i>Pseudechis porphyriacus</i>	12
Plants	426	12. Wild Turkey	<i>Alectura lathamii</i>	7
Bryophytes	1	13. Australian King-parrot	<i>Alisterus scapularis</i>	6
Gymnosperms	0	14. Bindjulang	<i>Dasyurus maculatus</i>	6
Ferns and Allies	24	15. Eastern Yellow Robin	<i>Eopsaltria (Eopsaltria) australis</i>	6
Angiosperms	401	16. Water Dragon	<i>Intellagama lesueurii</i>	6
Monocots	120	17. Eastern Dwarf Tree Frog	<i>Litoria fallax</i>	6
Dicots	281	18. Swamp Wallaby	<i>Wallabia bicolor</i>	6
Fungi	0	19. Australian Magpie	<i>Gymnorhina tibicen</i>	5
Chromista	0	20. Sugar Glider	<i>Petaurus breviceps</i>	5
Protozoa	0	21. Crimson Rosella	<i>Platycercus (Platycercus) elegans</i>	5
Bacteria	0	22. Red-crowned Toadlet	<i>Pseudophryne australis</i>	5
Algae	0	23. Short-beaked Echidna	<i>Tachyglossus aculeatus</i>	5 v



























Yours sincerely,  
Karen Benhar  
President – Friends of Berowra Valley