

National Parks Association of the ACT Submission on the Draft ACT Trails Strategy



CBRE
GPO Box 1987
CANBERRA ACT 2601

ACT Trails Draft Strategy

Thank you for your invitation to make a submission on the ACT Trails Draft Strategy (“the Strategy”). As you would be aware, the National Parks Association of the ACT (“NPA ACT”) is a community-based conservation organisation that has devoted more than fifty years to the protection of 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.

Key Comments

Appropriate recreation in conservation reserves has many benefits; as well as physical, mental and social health benefits there is the potential for recreational participants to obtain an enhanced awareness of the importance of these reserves for the conservation of nature. Therefore the NPA ACT encourages community participation in low impact activities in the ACT’s conservation reserves. However, these activities should not be at the expense of the conservation values of the reserves.

Many of the areas covered by the Strategy have the planning designations of National Parks, Nature Reserves or Wilderness. Under legislation, these designations must be managed primarily for conservation and other activities such as recreation are subordinate to this primary management objective. It is felt that the Strategy has failed to allow for the different management requirements for these areas as opposed to those that can be applied to areas such as unleased rural lands including current and former forestry plantations where significantly different management objectives apply. While Sections 1.5 and 1.6 recognise environmental policies, the Strategy still represents a single approach to trail management which is inadequate for the ACT’s varying public land categories.

The NPA ACT welcomes the recognition in the Strategy of the need for an ACT recreation strategy. Such a strategy is vital for ensuring that recreation opportunities in the ACT are comprehensive and are adequately planned. There is an urgent need for the development of such a strategy as the ACT continues to push ahead with its urban development. The identification of, and planning for, public and private opportunities for recreation has the potential to reduce overuse and environmental damage in the ACT’s conservation reserves.

The NPA ACT believes that, properly developed, the Strategy will be an important component of an overall recreation strategy. The NPA ACT is however puzzled that

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the Strategy continues to include questions directed to elicit comments that should have been sought at the discussion paper stage e.g at the end of section 1.23. It would appear based on the wording of the Strategy and the inclusion of such questions that further significant changes are proposed before the Strategy is finalised.

The Strategy fails two of its stated benefits, being the identification of guidelines and priorities and an agreed approach. The Strategy lacks priorities in regards to its suggested actions. Priorities are vital for providing guidance to the implementers of the Strategy and for the allocation of resources. The assessment criteria proposed in the Strategy requires further adjustment as it would appear to give a low score to the Alpine Trail.

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 can be contacted on 0410 875 731.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rod Griffiths', is written over a light grey rectangular background.

Rod Griffiths
President
12 January 2014

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Attachment A - Detailed Comments

1.7 The link between increased population and the need to better resource the management of recreational trails in Nature Parks, Reserves and rural lands has not yet been recognised in policy.

1.8 The discussion under the 2005 ACT Forests Recreation Strategy raises key issues. It states that “recreational activities in forests reduce pressure on nature reserves and other natural areas, and that forests are better able to accommodate higher impact and potentially more damaging activities.” The NPA ACT has championed similar concepts however the ACT has seen significant reduction in the areas under forestry management and the impact of this should be addressed as part of the (Trails) Strategy.

In addition, while it is extremely likely that the emphasis on recreation in the documents referred to under 1.8 does “suggest that the trail network will be required to respond to these demands through suitable access provisions” consideration must be given to how these expectations can be met without reducing the environmental values of the ACT’s conservation reserves. While the strategy refers to sustainability in trail creation and usage it does not provide clear guidance to users of the Strategy on how this is to be achieved.

1.9 As this is document is the future Trails Strategy shouldn’t the statement “The future trails strategy and the development and implementation of the actions it proposes are to remain consistent with these plans of management” actually read “The trails strategy and actions proposed by it will be consistent with these plans of management”.

The NPA ACT strongly supports the Strategy’s statement that it “is intended to complement environmental objectives by facilitating the sustainable management and use of the ACT trails network”.

1.11 The NPA ACT would strongly challenge the basis for the statement “(A)s a component of structured nature tourism, trails have also demonstrated significant potential to generate revenue for conservation management.”. Historically, within the ACT, events or activities involving trails have had little impact on the resources for conservation management. The resources required to manage such events have potentially reduced the resources available for conservation management as fees imposed for the use of conservation reserves are unlikely to cover true costs. Revenue accruing to the ACT Government from increased tourism has no direct link back to conservation management as it goes into general revenue.

1.24 The NPA ACT supports the Strategy’s proposal for a trails inventory, as some of the information in the maps accompanying the Strategy appear to be outdated.

1.25 The NPA ACT strongly supports the Strategy’s statement on the need to ensure “that adequate and appropriate recreational opportunities are available across the ACT to minimise the pressure on sensitive environments.

1.26 The NPA ACT supports the principle in the Strategy on trail sharing.

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1.27 Increasing connectivity for its own sake is not a desirable outcome and could result in a plethora of trails crossing conservation areas. Decisions to improve connectivity must consider the strategic importance of the trails involved and the conservation values of the land that would be affected.

1.42 While a ten year time frame for the strategy is reasonable the commencement date of this timeframe should be from the date of implementation of the final strategy, not 2013.

1.46 The scoring system would appear to require additional consideration. For example, based on the current scoring model, it is likely that an iconic trail such as the Alpine trail could receive a low score.

Strategic Goals and Actions – A planned and sustainable trails system should be the first goal listed as this is a key component of the vision statement. Sustainability should clearly include an assessment of any trails impact on conservation values.

The goals fail to address the need for further research on the impacts of events on the values of conservation reserves. Such research would inform scientific assessment on whether events should events and the frequency of events in conservation areas. Significant events should be contributing to the funding of such research.

The actions need to be given priorities in order to facilitate implementation of the Strategy in an environment of limited resources.

Minor issues

1.5 “nature reserved” should be “nature reserves”

1.23 this should be Conservation Council ACT Region