



Red Hill Regenerators  
21 Bass Gardens  
GRIFFITH ACT 2603

[DraftACTTrailsStrategy@act.gov.au](mailto:DraftACTTrailsStrategy@act.gov.au)

Dear Manager

### Introduction

The Red Hill Regenerators Group (RHRG) is grateful for the opportunity to comment on the Summary of the Draft ACT Trails Strategy 2014-2024 (the Draft Strategy). The following comments are provided in response to this opportunity. The comments relate specifically with Red Hill in mind but may be appropriate to Canberra Nature Park and other nature open spaces.

The RHRG commends the ambitions of the Draft Strategy and would like to see safeguards, such as staging and funding, put in place to ensure the aims of the Draft Strategy are achievable.

These comments are set out in the same arrangement as the Draft Strategy. Some of the comments may be addressed elsewhere in the Draft Strategy – if this is the case some cross-referencing in the Draft Strategy would be useful.

### **1. An invitation to comment, page 5**

The RHRG considers that the purpose of commissioning the Draft Strategy, as outlined in Page 5 paragraph 4, is appropriate and overdue.

The intent of the Draft Strategy, Page 5 paragraph 5, is welcome but it needs to recognize that 'discussion' is not an end in itself and should lead to revision and reconsideration of a revised Draft Strategy. As indicated in the document, the issues relating to trails are fraught with interest group concerns and these need to be thoroughly addressed before the Draft Strategy is considered for approval.

Many of the following comments relate to funding. While this may seem to be an obvious or automatic consequence of a final strategy, experience shows this is never the case and it is therefore essential that the comprehensive strategy be staged to ensure the initial steps are funded for completion before the next steps are agreed. The comments in section 5.6 cover this to some extent but it needs to be expanded beyond maintenance and emphasized.

## **2. Introduction**

### 2.1. What is a trail?

Noted and agreed

### 2.2. Scope of the Draft Strategy

The RHRG is concerned that the Scope concentrates too much on recreational use and is not sufficiently balanced towards the primacy of conservation of the nature reserves. This is referred to in section 5.10 but does not seem to be reflected in commentary elsewhere in the Draft Strategy

### 2.3. Areas Covered by the Draft Strategy

Noted

### 2.4. The need for a Trail Strategy

The RHRG fully supports the need for a Trail Strategy and agrees with the benefits. However, these will only be realized if there is sufficient funding for construction, maintenance, operations and compliance monitoring. This cannot be overemphasized.

## **3. The Strategic Context**

### 3.1. Interaction with planning policies

The listing of relevant planning policies is useful. However, the report could indicate whether or not they have been successfully implemented.

### 3.2. Plans of management

Again, the report should indicate the current status implementation of these plans of management. The operations plans have been developed over the past few years and are still some way off completion.

### 3.3. Population growth

The final paragraph in this section needs to be stressed.

### 3.4. Sport and Recreation

While sport and recreation policies and recommendations are essential components promoting a healthy community, the Draft Strategy needs to recognize that there are invariably a range of agencies and other organisations which end up funding the works, maintenance and repairs, with no extra budget allocations.

In this context, it is worthwhile recognising the tourism and other benefits that come with general and particular events. However, the revenue that these activities bring to the ACT is rarely, or insufficiently, offset by funding for remediation.

### 3.5. Managing impacts on environmental, cultural and heritage values

The RHRG suggests that this section become the first in 'chapter' 3, rather than the fifth.

The word 'may' in paragraph 1, line 3, should be changed to 'will'.

This section needs to be developed much more to emphasise the disconnect between plans of management, legislation and advisory recommendations and the funding needed for implementation. The 'controls' referred to in this section have no, or insufficient, funding to maintain the base load of nature reserve management let alone funding the requirements of a trails strategy. Also, the legislation tends to have insufficient compliance resourcing and ineffective pecuniary consequences. There is much evidence of environmental damage where the perpetrators cannot be found, or where the fines are ineffective.

Further, there are significant lessons to be learned from the development of the Centenary Trail project particularly in terms of the interface between user group pressures and conservation requirements. Some of these lessons should be acknowledged in this Draft Strategy. Some examples are: the depth of knowledge of particular nature park areas by groups such as Parkcare and Landcare, the funding allocated without a good understanding of what was achievable, the, at times, poor ongoing consultation. It would be useful to know what changes in use of trails has resulted from the development of the Centenary Trail.

Consideration also needs to be given to the adequacy of existing facilities – are they efficiently used, etc?

### 3.6. Physical and social health

It is not clear what the percentages in paragraph 1 refer to, apart from the first item.

### 3.7. Events and Tourism

The RHRG supports nature based tourism in principle. However, there is probably a salutary lesson in recognizing that recently there has been an acknowledged need to have physical access controls of some areas which implies that relatively free access and insufficient remediation funding results in poor outcomes. Examples include Tidbinbilla and Mulligan's Flat, and the National Arboretum (recognizing this latter is outside the scope of the Draft Strategy).

### 3.8. Technology

It may be useful to identify some of the recreational uses resulting from these technological advances, such as orienteering, or to make it clearer that all users are increasingly using the technology.

### 3.9. Transport

This section needs to recognise the continuing and growing use of non-bike trails by cyclists in the nature reserves, to canvass specific mechanisms and costs to change this practice and the inability to put in place effective compliance.

## **4. Stakeholders**

### 4.1. Territory Government

There is an implication in this section that responsibility equates to sufficient funding to deliver the goods and services for which the organization is responsible. As this is not the case, this matter should be addressed.

### 4.2. Commonwealth Government

Comment as for 4.1

### 4.3. Recreational Walking and Running

Noted

### 4.4. Equestrian Activities

### 4.5. Orienteering and regaining

### 4.6. Dog sledding

### 4.7. Mountain biking

### 4.8. Motorised recreation

It would be useful to understand the costs and benefits of the activities described in 4.4 to 4.8 with a view to developing different management regimes.

### 4.9. Recreational users with accessibility and mobility constraints

Agreed. It would be helpful to have maps of trails with ratings for differing levels of mobility. This may be what is indicated in the final paragraph. A reference to section 5.11 below would be useful.

### 4.10. Conservation and environment stakeholders

It would be helpful to define the difference, if any, between 'conservation' and 'environment' stakeholders so that their separate interests can be identified.

## **5. Key issues**

### 5.1. Inventory of trails

Agreed, but it is not clear how the community input is to occur. There needs to be verifiable and reliable data capture which would also need to be carefully managed.

## 5.2. Concentration of users

Agreed, but the final paragraph should also state that it is important to fund remedial works.

## 5.3. Trail sharing

Agreed, however funding for these activities (education, signage, trail design, segregation and limiting access) as well as compliance needs to be provided.

## 5.4. Limited connectivity

Agreed

## 5.5. Reporting of issues

Agreed. Again, funding needs to be provided for better responses by PCS, and to advertise the available reporting mechanisms.

## 5.6. Provision of maintenance

Agreed.

## 5.7. Proliferation of the trail network

Agreed. Again, this will require significant funding.

## 5.8. Trail closure

The RHRG supports appropriate trail closure on conservation grounds. It would be useful for the Draft Strategy to make a recommendation along the lines of developing and publicizing criteria to justify trail closures. It is important that the priority be on conservation.

It might be possible to include some consideration of user groups funding continued trail access or that there be some kind of offset, especially where the environmental impact of particular users is significant

## 5.9. Access to trails

The first paragraph needs to be significantly qualified – not all members of the community should have access to pursue their particular sport or recreation, for example shooters, any illegal activities and anything else that is highly dangerous to others and to the environment. Also, access should be subject to some controls such as those in this Draft Strategy, for example equestrians should not be able to access every trail. Whilst this may be implicit, it should be made explicit.

5.10. Impacts on ecological and cultural values

The primacy of conservation values needs to be emphasized up front and repeatedly.

The carrying capacity needs to be assessed as a very early activity. Without this information it is not possible to sensibly assess the potential uses of an area. This is an important requirement but will require significant funds to undertake.

5.11. Need for a trail identification and classification system

Agreed

5.12. Limited access to up to date trails information

Agreed

5.13. Lack of usage data

Agreed. This section should also include a statement on the need for appropriate funding.

5.14. Staging events

Agreed

5.15. Public access and Government liability

Noted

5.16. Unexplored tourism potential

Noted and agreed. However, before too much work is put into developing nature reserves for tourism, sound data on actual tourism numbers and impacts should be collated and considered. For example, if the Arboretum and the Centenary Trail do not actually attract tourists then the Draft Strategy will need to be reconsidered.

5.17. Management structure and funding

Noted. There is also a need for Sport and Recreation (EDD) or PCS to be funded for implementing Sport and Recreation policies relating to trails use. There should not be any disconnect here.

5.18. Protection of the network

Noted. It would be useful to have some examples in this section.

## **6. The Proposed Strategy**

### 6.1. Time frames

The years '2013 to 2023' needs to be changed to '2014 to 2024' at least. It is debatable whether the Strategy implementation could now commence in 2014.

The RHRG would like the Strategy itself to be staged to ensure that the basics can be implemented properly. If this implementation cannot be achieved then the rest of the Strategy needs to be re-developed fairly quickly to re-direct activities efficiently.

The need for a comprehensive five year review is agreed. However, annual reviews should be made to identify any particular and significant problems.

### 6.2. Implementation

The RHRG would like to see the next draft of the Strategy. Experience shows that accommodating a range of community comments can sometimes lead to unintended outcomes that would be identified in a second invitation to comment.

### 6.3. Key values

While all these values are appropriate, it is not clear how the Strategy will be able to do any more than articulate them.

### 6.4. The Vision

This vision needs to include a strong statement on the primacy of conservation.

### 6.5. Delivery of the Vision

Noted and generally agreed but the 'less than' and 'more than' scores should be 'up to and including' or 'X or more'. As written, scores of zero and ten are not covered.

## **Table 6**

Noting that this table will need to be considered and refined as identified in section 6.5, the following comments are made.

Page 52, Maintenance second item – the score of 10 is too low, it should be at least 20.

#### 6.5.1. Strategic goals and actions

These strategic goals and actions are generally supported. Specific comments are as follows with numbering related to those in the Draft Strategy.

Items 1 to 10 will be challenging and should be well in hand before much other activity takes place.

Item 13 – include environmentally sensitive trails. That is, take into account this factor in deciding which tracks to close and consider closing those that lead to areas of rare and endangered species.

Conclusion

The RHRG supports the majority of this Draft Strategy but would like to see more emphasis on conservation and the need for significant funding.

Yours sincerely

Ross Kingsland  
President, Red Hill Regenerators  
10 January 2014