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Dear National Parks and Wildlife Service,

RE: Draft Cycling Policy, Strategy and Implementation Guidelines

Thank you for the opportunity to comment on the draft Cycling Policy, Cycling Strategy and Cycling Strategy: Guidelines for Implementation developed for the NSW National Parks. Bicycle NSW has been the peak bicycle advocacy group now in NSW for over forty-five years, and has over 30 affiliated local Bicycle User Groups.

Our mission is to *'make NSW better for all bicycle riders'*, and we support improvements to facilities for pedestrians and cyclists for both daily transport and recreation. Bike riding provides a healthy, congestion-reducing, low-carbon form of travel that is quiet, efficient and attractive for all ages with the correct infrastructure design.

We applaud the efforts being made to provide more places to ride in National Parks. A doubling of visitation rates¹ between 2010 and 2018 reflects the love people have for these parks. The changes to the way we travel, work and play during the Covid-19 pandemic has seen a further steep rise in people walking, riding and driving in the National Parks. We appreciate that a growth in facilities for bike riding must be carefully balanced with the ongoing protection of sensitive environments.

Evaluating proposals for bike riding:

Bicycle NSW supports the development of a clear assessment process for potential cycling experiences within National Parks. The new evaluation methodology, reflected in the flow diagram on Page 20 of the Draft Cycling Strategy: Guidelines (Fig. 1), clearly articulates how decisions will be made on whether to allow cycling in a particular park. A standard approach will help all stakeholders to understand the process and the documents that must be prepared at each step.

Some people may be disappointed over the removal of trails that they currently use. The creation of new trails will help, and doubtless delight many riders. Part of ensuring success and positive engagement will depend on clear communication about the alternative trails, and directing riders to these. It will also be important to consider how accessible the new alternatives are to the creators of previous trails. For young riders, and those without cars, the creation of an alternative trail that requires a car to transport your bike to use it will make it inaccessible.

Recommendations:

We advise considering the accessibility of the new alternative trail to the old users of any informal trails, in order to maximize the successful rehabilitation of national park area and transition of riders.

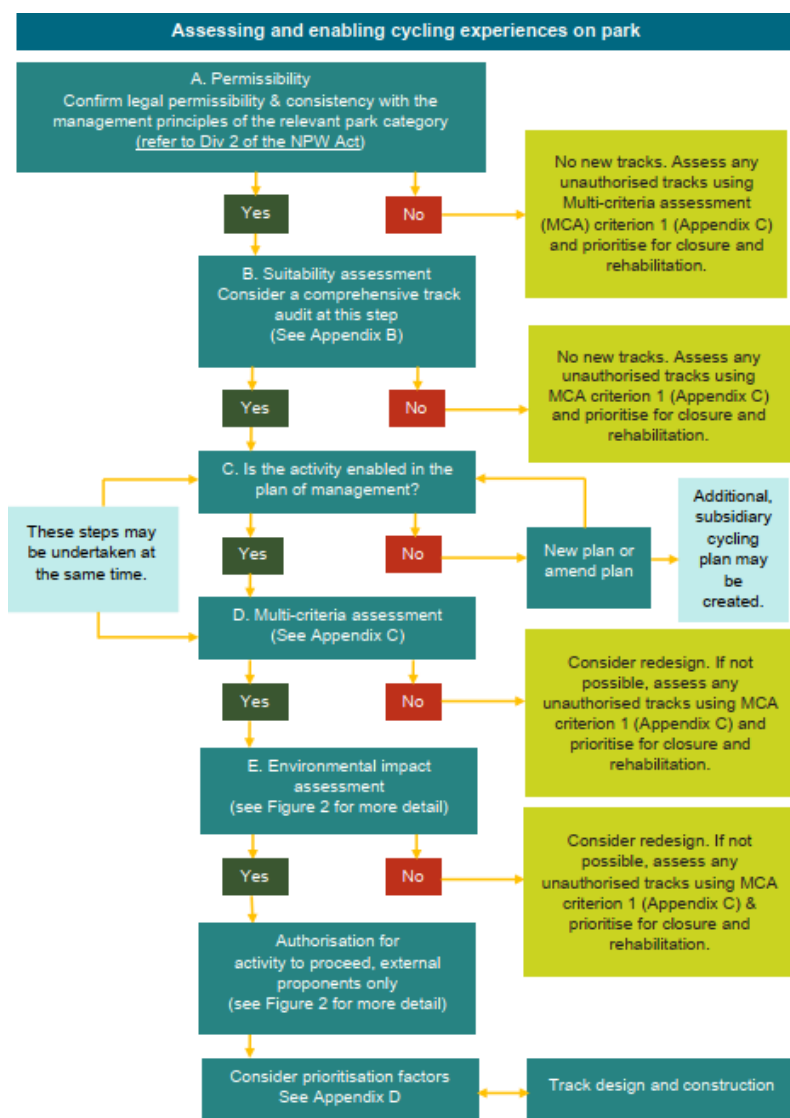


Figure 1: Flow diagram showing the evaluation methodology for new cycling experiences in National Parks (Source: DPIE)

Accessibility:

Bicycle NSW commends the priority placed on improving accessibility. Providing a range of trails and facilities that are accessible to people who use wheelchairs and prams is an important part of social inclusion. For some people who are unable to walk far, a bicycle or e-bike provides mobility assistance and will enable them to access natural environments.

We appreciate that the draft Cycling Policy and Cycling Strategy have mentioned making toilets and car parking accessible. Poorly designed facilities can act as barriers to inclusion. However, it is important to note that age, health issues, disability or financial constraints prevent many residents of NSW from owning or driving a car. Others will choose car-free lifestyles. A lack of alternative transport puts most national parks out of reach, especially if you would like to cycle when you arrive.

There is a large unmet need in NSW for improved travel integration for bike riders. Enabling people to take bikes on trains without the requirement to disassemble and box them and fitting bike racks to buses could allow more teenagers, tourists, elders and non-drivers to reach national parks. Reducing car dependency for access to parks would have further benefits of reducing congestion, a serious problem in popular areas, noise and pollution.

Recommendations:

- The draft Policy and Strategy should include objectives to enable more people to access parks without a car. NPWS must work with Transport for NSW and private providers to create more public transport options and find solutions to the barriers that prevent bike being transported on buses and trains.
- New and enhanced links to existing local cycling networks outside national parks is an important element of future planning. This will encompass improved safety on the roads in and around the parks through cycle lanes, wide shoulders or separated bicycle paths, as well as off-road tracks. Enabling visitors to arrive by bicycle is essential for 'connectivity' and 'ease of access'.
- Ensure that new cycle infrastructure is inclusive and accommodates non-standard bikes such as recumbents and wheelchair bikes wherever possible. It is important to include ramps and dropped kerbs and consider bikes of different widths when designing modal filters. Any measures enabling cycling by disabled people will support a growth in cycling by novice cyclists, children and older peopleⁱⁱ.

Road and fire trail cycling:

Bicycle NSW is delighted that the new set of documents applies to the full range of cycling experiences. Many of our members are keen road cyclists and others enjoy longer trips on fire trails. However, there is still a focus on the development of off-road mountain bike facilities.

Recommendations:

- It is important to consider how to improve safety on roads and fire trails that are used by multiple types of vehicles and work with the relevant road authorities to achieve a high and consistent standard of infrastructure.
- The condition of the roads can be a major issue and the surfaces must be kept well-maintained. Wide sealed shoulders or bike lanes are needed on busier roads to separate bike riders from cars, allowing a wider range of cyclists to feel confident on the roads.
- Conflict between cars and people riding bikes, trail bikes and horses needs to be managed through continued engagement with all stakeholders.

Children and family cycling:

The Bicycle NSW *Build it for Everyone* policy pillarⁱⁱⁱ sets a standard that bicycle infrastructure should be fit for eight year old children or elders to ride on. The draft Cycling Strategy and Policy do not include any explicit objectives or actions to develop facilities for families.

Recommendations:

- A key aim of the Strategy should be to enable families and children to enjoy cycling experiences in National Parks. Plans for new facilities need to include beginner tracks, mini-circuits and practice areas that can be supervised easily. Where a stretch of road would be useful for families to combine trials or link up with public transport, fully separated bike paths should be considered.

- Information about trails should include advice about suitability for children of different ages and how long a trail may take to complete. Parents also need to know about toilets, water fountains and possible shelter when planning trips.
- Playful elements such as small jumps, bush art, treasure hunts, natural tunnels or bridges could be incorporated into appropriate trails to make the ride more fun for children. Such features would be particularly welcomed by parents and guardians when the distance or topography is challenging!

Bikepacking and tourism:

Many riders prefer trips that can be completed within one day. However, 'bike-packing', where riders cycle and camp over a period of several days, is a very popular activity that is growing as facilities across the country expand to meet demand. Cycle tourism has enormous potential to attract domestic and international tourists, and provide opportunities to generate revenue for parks, local businesses and tour operators. For example, the Central West Trail near Dubbo is a 400km waymarked loop that has revitalised several country towns since April 2020^{iv}, attracting thousands of cyclists to the area for a 5- or 6-day adventure. The Northern Rivers Rail Trail will be a catalyst for the Tweed Valley becoming an important hub for cycling. The Tumbarumba to Rosewood trail has brought a constant flow of visitors to small villages in the area since it opened in 2020, supporting 9 new businesses^v.

Recommendations:

- Bicycle NSW encourages the development of opportunities for bike-packing in suitable areas. Roads and trails through National Parks should form part of new scenic waymarked routes that will draw cyclists from far and wide and support a vibrant rural economy. It is important to work closely with neighbouring LGAs to facilitate longer touring routes and publish maps and resources to promote cycle touring. This aligns with the State Government's NSW Visitor Economy Strategy 2030, which includes a commitment to develop accessible tourism, products, experiences and visitor precincts
- Camping and cabin facilities should allow access by bike where appropriate and provide space for secure overnight storage of cycles and other equipment.
- 'Mountain biking' should be distinguished from 'bikepacking' in the Cycling Strategy and Cycling Policy. This may be useful to better understand the different markets and user experiences being sought. In the draft documents, bikepacking language is not used.

Improved information management:

NSW offers wonderful destinations for riders. PDF maps can be downloaded for each of the National Parks, and the National Parks website is excellent and offers detailed information about park facilities. However, it can be difficult to source up-to-date information that reflects important weather, flood, fire risk, accommodation, attractions and any alterations to trails. Clicking on the 'alerts for closures in NSW parks' in the app does not always provide relevant information. Often riders rely on third-party blogs for information to plan their trips and understand how trails can be connected together, but these are not updated regularly. Visitors to National Parks can also face challenges when trying to navigate as digital connectivity to access the internet on a phone can be poor, and detailed mapping is often limited to roads.

Recommendations:

- Once the Cycling Policy and Cycling Strategy are completed, Bicycle NSW would like NPWS to undertake further digital development to enhance the way visitor information is presented and accessed. Well-organised information can help attract and inform visitors, and generate revenue from advertising and links to relevant businesses.

Conclusion:

Bicycle NSW applauds the publication of this important suite of documents to guide the future development of cycling facilities within and around NSW National Parks.

We look forward to working with DPIE and NPWS to progress the delivery of bicycle infrastructure in the future and riding on the new facilities.

Yours faithfully,

Sarah Bickford

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ⁱ DPIE. 2021. Draft Cycling Strategy Guidelines for Implementation. <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Parks-management-other/draft-cycling-strategy-guidelines-210401.pdf>

ⁱⁱ Wheel for Wellbeing. 2020. A Guide to inclusive cycling. https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/12/FC_WfW-Inclusive-Guide_FINAL_V03.pdf

ⁱⁱⁱ Bicycle NSW (2018) Our Policy, [online as at 24/2/2021] <https://bicyclensw.org.au/our-policy/>

^{iv} Central West Cycle Trail. <https://centralwestcycletrail.com.au/>

^v Railtrails Australia. 2021, April 18. Local economy thrives since the opening of the Tumbarumba to Rosewood Rail Trail. <https://www.railtrails.org.au/2021/897-local-economy-thrives-since-the-opening-of-the-tumbarumba-to-rosewood-rail-trail>