

*Gardens of Stone
State Conservation Area*

*Draft Statement of Management Intent, Draft Plan of Management,
Draft Master Plan*

July 2022



Established 1981



Submission to the
Manager, NPWS Planning and Assessment

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About the MCC of NSW

The Motorcycle Council of NSW Inc. (MCC) is an internationally recognised umbrella group for motorcycle clubs, associations and ride groups, in the state of New South Wales.

Established in 1981, the MCC is recognised as the peak motorcycle representative body in NSW and Subject Matter Experts on many complex issues dealing with motorcycling including crash data and statistics, traffic data and congestion information.

The MCC has published documentation that has been referenced worldwide by overseas motorcycling and traffic bodies and has produced video training films that have been utilised and referred to by many overseas trainers, researchers and ride associations.

MCC is the peak representative body for motorcycling in the state of NSW representing over 60 motorcycle clubs, which have a total membership of over 41,000 motorcyclists.

In 2020 the MCC formed a Trail and Adventure Riders sub-Committee to represent the interest of those who ride predominately on unsealed roads and tracks. The sub-Committee has as its Vision:- "That trail and adventure riding is acknowledged and supported by Government, land managers and the general community as a legal, legitimate, healthy, sustainable, and active recreational activity".

We wish to thank the National Parks and Wildlife Service for the opportunity to present this submission and the views of our member clubs on the Draft Statement of Management Intent, Draft Plan of Management and Draft Master Plan for the Gardens of Stone, State Conservation Area,.

Should you require further information on the information contained within this submission please feel free to contact the MCC.

Brian Wood

Secretary

Submitted on behalf of the Trail and Adventure Riders sub-Committee

The Motorcycle Council of NSW wishes to make the following comments:-

General Comments:-

1/ Trail riding in what is now the GoS SCA has occurred for many years. Some riders have been riding there for over 40 years as it was previously generally accepted that licensed riders on registered trail bikes could use this area.

A percentage of this historic trail riding has been on single track which is described as being a trail that is approximately the width of a bike and has a single path. It contrasts with a road or fire trail which is wide enough for four wheel drive and similar vehicles and has two paths. These two path tracks are commonly referred to a dual track or twin track. A single track can be a dual track that has been allowed to overgrow but has been kept open by trail bike use.

Single tracks follow the natural features and contours of the landscape resulting in windy technically challenging tracks that generally do not require any modification of the landscape.

2/ Trail riding in NSW is currently a recreational activity that is unmanaged, unlike other States, NSW does not have a strategy to manage trail riding as a legal, legitimate, healthy, sustainable, and active recreational activity. So when issues arise in NSW there are no guidelines or precedence on how to manage or resolve any issues pertaining to trail bikes.

It should be noted that Queensland Parks and Wildlife Service has several areas where single track trail riding is permitted notably Vernon State Forest. This area is managed under a MOU between the QPWS and the Fraser Coast Motorcycle Club. This MOU has been in place for 4 years.

Experience in Queensland and other States on how to manage trail bike riding could be used to establish how trail riding could transition from an unmanaged activity to one that is appropriately controlled.

The Motorcycle Council of NSW in conjunction with Outdoors NSW and ACT has started to address this lack of a strategy by producing a Discussion Paper https://www.outdoorsnswact.org/_files/ugd/51f01e_bd5fc1acadb24ca29cd6150cc13a1941.pdf on Trail and Adventure Riding.

3/ Unfortunately the perception of trail riding by many in the community is based on the uncontrolled activity of a small percentage of riders who lack an appreciation of the area in which they ride.

Much of the environmental damage is due to uncontrolled use of unregistered trail and quad bike often by unlicensed riders, bearing in mind that the sum of any environmental damage is quite small.

4/ An Object of the National Parks and Wildlife Act 1974 is to:-

- (a) fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation,
- (b) providing for the management of land

A survey by the MCC in 2020 of 2,403 riders found that 89% enjoy the Outdoors. As the majority of riders find enjoyment when outdoors, then providing continued access to the GoS SCA presents an opportunity to further foster riders' appreciation, understanding, enjoyment of nature and the cultural heritage and conservation needs of the areas in which they ride.

Education programs specifically targeting trail riders need to be included in the Master Plan.

5/ There has been discussion that single track trail riding is against NPWS policy. However it has not been possible to locate such a policy, it appears this discussion is based on an interpretation of the vehicle access policy:-

“Vehicle access, including 4-wheel driving and registered trail-bike use, can be appropriate in certain places in certain parks where it is compatible with the conservation and visitor management objectives of the park.”

As the reluctance to allow single track trail riding in the GoS SAC appears to be an interpretation of the vehicle access policy, the way forward is to create a framework that makes trail riding compatible with the conservation and management objectives of the GoS SCA.

Due to the size and diversity of the GoS SCA, allied with its history of trail riding, there is an ideal opportunity to conduct a trial to determine how trail riding can be properly managed so it is compatible with the conservation and management objectives of the GoS SCA and then leveraged in other locations.

Guidelines need to be developed for trail riding, similar to those for mountain bike tracks, on how to minimise the environmental impacts of trail riding. None appear to currently exist on how to assess if the environmental impacts are acceptable and if not, how to modify the tracks to reduce the impacts to an acceptable level.

Co-operation between Government agencies has already been demonstrated in what has become the GoS SCA when a rider group assisted the Local Land Service to install a rock bridge across the swamp in Happy Valley. Prior to the installation of the rock bridge the swamp was degraded but is now regenerating.

6/ Currently there is discussion on how to allow trail bike access to Jellore, Belanglo and Meryla Flora Reserves under a permit system. Details of this system are yet to be finalised. A similar permit scheme could be applicable to GoS SCA.

7/ The existence of the motocross track operated by the Lower Mountains Motorcycle Club needs to be included as an existing use that will continue. It should be noted that unregistered motocross bikes will be transported through the GoS SCA on trailers and utilities. Not only to the track but to potentially utilise the camping grounds that are to be developed as part of the Master Plan.

8/ Shared use of tracks by trail riders enables tracks to remain open for other recreational users such as hikers and horse riders that otherwise they will become over grown.

Single tracks that are kept open by trail riding can also have benefits for cultural burning and search and rescue activities.

9/ Current GoS SCA documents out for public comment do not recognise that registered trail bikes can legally access roads and tracks that are recognised as being accessible by 4WDs. This is seen as discriminatory both for 4WDs and against trail and adventure bikes. All motor vehicle references should be to 'registered vehicles' and not to specific types of vehicles unless pertinent.

10/ The MCC in conjunction with Outdoors NSW & ACT has produced documents identifying how trail and adventure riding can be treated as a legal, legitimate, healthy, sustainable, and active recreational activity that also has benefits for physical and mental health as well as making a financial contribution to the areas in which they ride. See outdoorsnswact.org/trailbikes The MCC and Outdoors NSW & ACT conducted a survey of riders which found that across one year, an average group of 6 riders injects \$49,518 into the local economy in the region they visit.

Specific Comments on the Statement of Management Intent

Page 5

The Gardens of Stone landscape presents an awe-inspiring natural setting for people to connect with nature and wonder at the majesty of the natural environment. The area has historically been used for a variety of recreation, including four-wheel driving, trail bike riding, mountain-biking, birdwatching, bushwalking and rock-climbing. With promotion and sustainable infrastructure development, these recreation values have the potential to complement existing visitor experiences in the region and contribute to diversification of the local and regional economy.

Comment:- Trail riding is recognized as a historical use. Some riders have ridden there continuously for over 40 years along 100s of kms of trails. With promotion and sustainable infrastructure development, trail riding has the potential to continue as a recreational activity in the region and contribute to the local and regional economy.

Page 7

- There are several inholdings in the state conservation area that will continue to be accessed and used by third parties for other land uses. These include a number of commercially operated sand quarries, Lost City Reserve managed by Lithgow City Council and historic Farmers Creek No 2 Dam (built in 1907) which forms part of Lithgow City Council's water supply.

Comment:- The motocross track owned and operated by the Lower Mountains Motorcycle Club needs to be included as one of the inholdings that needs to continue to be accessed and operated by a third party. It will be necessary for unregistered motocross bikes to be transported through the GoS SCA on trailers and utilities. Not only to the track but potentially for participants to make use of the camping grounds.

Page 8

- Unauthorised and uncontrolled off-road vehicle activity has increased significantly over the last 20 years damaging native vegetation, causing significant soil erosion and impacting the scenic value of the area. Use of the area by unregistered motorbikes and vehicles has also been an ongoing problem. This will be addressed by the provision of managed opportunities.

Comment:- Based on discussions with NPWS staff, the MCC does not anticipate that there will be any managed opportunities for unregistered trail bikes but it does expect there to be managed opportunities for registered trail bikes. However, any opportunities for registered trails bikes have not been explored in the Master Draft Plan, especially with respect to any single track.

Page 10

Elements that will in place by early 2023 include:

- Upgraded visitor sites with car parks, visitor information and toilets
- signage for visitor orientation and safety
- vehicle based campsites
- upgraded access roads
- tracks suitable for four-wheel driving and
- tracks suitable for cycling

Comment:- it should be noted that the tracks suitable for four-wheel driving will also be suitable for registered trail bikes.

Page 11

Other elements to be progressed as a priority include:

- The development of a multi-day walk linking Gardens of Stone State Conservation Area with Wollemi National Park

Comment:- Multi-day walking tracks are only likely see occasional use by walkers. Allowing these tracks, where appropriate, to be shared by registered trail bikes will keep these track open which otherwise would become overgrown.

Comments on the Draft Plan of Management

Page iv

“Gardens of Stone State Conservation Area is reserved to achieve the objects of the NPW Act. These objects are listed in Appendix A and are centred on conserving the natural and cultural values of the park, as well as fostering public appreciation, understanding and enjoyment of these values.”

Comment:- A survey by the MCC found riders appreciate being outdoors. Enabling managed access to single tracks by registered trail bikes will provide an opportunity to foster appreciation and understanding by riders of the natural environment in which they ride. This enhanced appreciation and understanding will result in them wanting to make riding in the GoS SCA a sustainable activity

and for them to volunteer to be involved in maintaining the cultural and natural heritage of the reserve.

Page 1

“Access tracks, lookouts and camping areas within the park have been visited for many years, although visitor facilities are currently limited. Community representatives and conservation groups have advocated for the protection of this area during this time and members of the community have also contributed to programs for the conservation of the area’s flora and fauna.”

Comment:- Trail riders have been one of the community groups who have contributed to conserving the area’s flora and fauna. Most recently they contributed to the installation of a rock bridge across the swamp in Happy Valley. As a result, this swamp has been rehabilitated. Trail rider groups look forward to further opportunities to contribute to programs to conserve the area’s flora and fauna.

Page 2

Opportunities for recreation and tourism. The Gardens of Stone landscape is an awe-inspiring natural setting. Once access has been upgraded and visitor sites have been developed, the park will provide opportunities for people to learn about Wiradjuri culture, connect with nature and enjoy outdoor recreation activities. The area has historically been used for a variety of recreation including 4-wheel driving, trail bike riding, horse riding, mountain biking, birdwatching, bushwalking and rock climbing. The park will continue to provide for a range of sustainable recreation while also supporting new tourism and recreational experiences. Its establishment as a major new visitor destination will drive the growth and diversification of the local and regional economy.

Comment:- A survey by the MCC found riders appreciate being outdoors. Continued access to the GoS SCA for trail bike riding, including single tracks, will provide an opportunity for riders to learn about Wiradjuri culture, connect with nature and enjoy their chosen outdoor recreation activity.

Comment:- As there is no NSW strategy for trail and adventure riding in NSW, trail riding is largely uncontrolled, however, with appropriate management trail riding can be a sustainable activity. Unfortunately, the perception of trail riding by many in the community is based on the visible and uncontrolled activity of a small percentage of riders who lack an appreciation of the area in which they ride.

Comment:- A survey by Outdoors NSW & ACT established that trail and adventure riders make a considerable contribution to the local economy of the areas in which they ride.

Page 3

Wiradjuri People, neighbours, nearby residents, recreational user groups and conservation advocates have a strong interest in the park’s future and seek opportunities to provide input into plans relevant to their area of interest. Facilitating the ongoing involvement of the community will be a priority.

Comment:- The trail riding community looks forward to continuing to have input into plans relevant to their chosen recreational activity. The trail riding community sees this as a priority.

Page 3

Off-road 4-wheel driving and trail bike riding, and the use of poorly constructed tracks has resulted in erosion and the loss of vegetation. There are an estimated 700 kilometres of tracks and trails in the park. Many of these are not properly constructed, are not required for park management purposes and are unlikely to add value to the visitor experience.

Comment:- The trail riding community looks forward to having input into how poorly constructed tracks can be upgraded so they are sustainable and add value to the visitor experience.

Page 5

The park will offer opportunities for a range of guided and independent activities, including learning about Wiradjuri culture, camping, sightseeing, rock climbing, canyoning, sustainable 4-wheel driving, cycling and bushwalking. The park will also provide opportunities for cultural and nature-based tourism businesses.

Comment:- With proper controls, trail riding needs to be included as a sustainable activity.

Page 7

The park's establishment provides opportunities for Wiradjuri People to progress their aspirations for Country. This could include participation in cultural activities in the park, involvement in park management activities such as cultural burning, employment, establishment of park-based businesses or educating visitors about Wiradjuri culture.

Comment:- Single tracks that are kept open by trail riding can benefit cultural burning processes.

Page 10

Vehicle access (including motorbikes)

Registered vehicles (including 4-wheel drives and motorbikes) are allowed on public roads (Figure 1). Vehicle access may also be authorised on additional roads and trails upon their designation for vehicle access. Vehicle access may be regulated through mechanisms such as by club permit or a booking system. Roads and trails may be temporarily closed to prevent damage, such as in wet weather, or to support management activities. Off-road access is not permitted.

Motorcycle use of walking tracks, single-tracks and cycle tracks is not permitted.

Comment:- A permit system for the use of trail bikes in the Jellore, Belanglo and Meryla Flora Reserves is currently under discussion. The MCC looks forward to having input into how such a scheme would operate.


Comment:- There is benefit in allowing trail bike access to some walking tracks and other tracks to enable cultural burning. Trail bike use will keep these tracks open for these activities.

Comments on the Draft Master Plan

Recommend changes to the wording:-

	Text	Comment
Page 7	<ul style="list-style-type: none"> Facilitating memorable recreational experiences 	Introduce education programs for trail bike riders so they have a better appreciation of the natural environment in which they ride
Page 8	The master plan is not intended to be a static document. Master plans require periodic review, as well as reconsideration when conditions, circumstances or settings change. Such revisions	As it is proposed that the Master Plan is a dynamic plan then this is an opportunity to allow a trial of single track trail riding.
Page 8	<p>10. Provide internal wayfinding system to roads, walking tracks and mountain bike (MTB) track network.</p> <p>12. Maintain a select network of four-wheel drive (4WD) recreational trails.</p>	The wording needs to be changed to recognise that roads and 4WD recreational trails will also be accessible to registered trail bikes
Page 10	<ul style="list-style-type: none"> vehicular access 4WD access 	Add registered trail bike access
Page 23	<ul style="list-style-type: none"> Motorised trail bike use is of high environmental impact and is not sustainable within the park. 	The installation of the rock bridge at Happy Valley has demonstrated that the environmental impact of trail bike use can be managed to make it sustainable.

Page 25	<ul style="list-style-type: none"> vehicular access 4WD access 	Add registered trail bike access
Page 27	<p style="text-align: center;">4WD access</p> <ul style="list-style-type: none"> Maintain a sustainable level and siting of registered 4WD and motorcycle access as a recognised aspect of park visitation. 	This recognises access by motorcycles which would include registered trail bikes
Page 30	<ul style="list-style-type: none"> Vehicle access, including 4WDs and motor bikes can have a significant impact on soil stability and geological features. 	It should be noted that while it can have significant impact on soil stability and geological features it has been demonstrated that these can be managed.
Page 32	<ul style="list-style-type: none"> Past and potential vehicular access creating erosion and water quality impacts: <ul style="list-style-type: none"> swamp edges impacted by vehicle overrun on adjacent tracks other areas as required. 	It should be noted that while past vehicular access has created erosion and water quality impacts it has been demonstrated that these can be managed.
Page 35	<p>5. Detailed mapping and assessment of former plantation forests, clearings, tracks and trails identifying those to be remediated and areas set aside for recreational activities.</p>	The recreational activities could include single track trail bike riding if appropriately controlled and managed as has been the case in the Vernon State Forest
Page 36	<p>6. Develop a sitewide interpretative strategy that integrates natural, Wiradjuri and historical stories of the place in a cohesive approach.</p>	This could be used to educate trail bike riders to better appreciate the areas in which they ride.

Page 38	<ul style="list-style-type: none"> Mitigating impact of detracting features, including: <ul style="list-style-type: none"> vehicle wrecks utility service corridors powerline easements above ground mining infrastructure. 	The powerline easements need to be shown on the maps (Figure 19, page 69, appears to show a powerline easement)
Page 41	<p><i>Birds Rock Precinct:</i></p> <p>a. Birds Rock Lookout:</p> <ul style="list-style-type: none"> 4WD vehicular access to small carpark vehicular barrier and picnic area short walking path to lookout consider potential toilet facilities. <p><i>Other visitor lookouts:</i></p> <p>a. Bungleboori north and south lookouts</p> <ul style="list-style-type: none"> 4WD vehicular access parking area vehicular barrier walking track to lookout. <p>b. Sahara Point:</p> <ul style="list-style-type: none"> 4WD vehicular access to Sunnyside Ridge Road small carpark vehicle barrier picnic area. <p>c. Wolgan Valley Lookout:</p> <ul style="list-style-type: none"> 4WD accessible route to parking area parking area picnic area. <p>d. Cape Horn Lookout:</p> <ul style="list-style-type: none"> 4WD accessible route to parking area walking track to lookout. <p>e. Baal Bone Gap:</p> <ul style="list-style-type: none"> 4WD accessible route to parking area picnic facilities. 	Access by registered trail bikes and motorcycles needs to be added where 4WD access is noted
Page 43	12. Develop wayfinding strategy for track identification for walking, mountain bike, shared use and 4WD use.	Registered trail bikes and motorcycles needs to be added to point 12
Page 44	<ul style="list-style-type: none"> To provide designated 4WD touring routes for registered vehicles. 	It needs to made clear that registered vehicles include trail bikes
Page 44	 <p>VISITOR VEHICULAR ACCESS & PARKING</p> <ul style="list-style-type: none"> 2WD UNSEALED ROAD 4WD UNSEALED ROAD 2WD SEALED ROAD PARKING AREA PARKING AREA (WITH NOTE 4WD ACCESSIBLE UP TO THE BDA) 	The legend on this and other maps need to note that 4WD unsealed roads are also for use by registered trail bikes

Page 45	<p>4WD recreational access</p> <p>20. Provision of a 4WD touring routes consistent with the reserve access strategy.</p> <p>21. Provision of designated skill-graded 4WD trail network including dry weather only accessible trails.</p>	The heading needs to be changed to:- “4WD and Registered Trail Bike recreational access” to recognise that these routes will be access to registered trail bikes
Page 47	<p>12. Clearly define walking tracks which are shared use (with cycle/MTB use) and walking only.</p>	Potentially shared use on single track could include registered trail bikes so tracks remain open for walking and horse riding
Page 51	<p style="text-align: center;">Key considerations</p> <ul style="list-style-type: none"> • Potential to build on existing users: <ul style="list-style-type: none"> - 4WD groups, - adventure groups. 	Potential existing users are trail bike groups
Page 54	<p style="text-align: center;">Strategies</p> <p>Services and facilities generally</p> <p>1. Management of Gardens of Stone SCA effectively balances its conservation function / environmental protection with its evolving as an iconic place of recreation.</p>	One of the iconic recreations being single track trail riding.
Page 76	<p>3 4WD unsealed access road to carparking for Birds Rock visitor node</p>	This is not only a 4WD unsealed access road but one that can also be used by registered trail bikes.
Page 80	<p>6 4WD recreational access provided to selected trails</p>	These trails will also be accessible to registered trail bikes
Page 84	<p>Proposals - Access</p> <p>1 Visitor vehicular access</p> <ul style="list-style-type: none"> - upgrade existing track for 4WD access 	Access also suitable for registered trail bike access

Summary

The Statement of Management Intent, Draft Plan of Management and Draft Master Plan have failed to acknowledge that:-

- registered trail bikes can legally access roads and tracks that are recognised as being accessible by 4WDs. All motor vehicle references should be to 'registered vehicles' and not to specific types of vehicles unless pertinent,
- the existence of the motocross track operated by the Lower Mountains Motorcycle Club and that unregistered motocross bikes will be transported through the GoS SCA on trailers and utilities. Not only to the track but to potentially utilise the camping grounds.

The reluctance to allow single track trail riding in the Gardens of Stone State Conservation Area appears to be an interpretation of the vehicle access policy, the way forward is to create a framework that makes trail riding compatible with the conservation and management objectives of the GoS SCA.

As the Master Plan is not intended to be a static document this allows for single track riding to be reconsidered. Single trail riding is a historic use of the Gardens of Stone State Conservation Area but it has been largely uncontrolled but with appropriate controls can become a sustainable recreation activity.

As the Management Plan will be gradually implemented over a number of years, this will allow single track riding to continue as a trial in selected areas to establish what controls are appropriate, such as:-

- developing guidelines to for trail riding, similar to those for mountain bike tracks, on how to minimise the environmental impacts of trail riding and then implement these guidelines,
- introducing education programs targeting riders to further foster riders' appreciation, understanding, enjoyment of nature and the cultural heritage and conservation needs of the areas in which they ride,
- introducing a volunteering program, similar to that used to regenerate the swamp in Happy Valley, so riders can be involved in maintaining the cultural and natural heritage of the reserve,
- investigating a permit system to control the numbers of users particularly in wet weather or during fire events,
- investigating methods of wayfinding to minimise the likelihood of riders deviating from designated tracks. Methods used for mountain bike tracks could be used as a template,
- investigating what controls currently used for mountain bike riding, a single track riding activity, could be adopted to single track trail bike riding,
- educating the general community of the health benefits, both physical and mental, that trial riding provides to community health,

- establishing how to maximise the economic benefits of trail riding to the local community and the region,
- working with the Motorcycle Council of NSW and Outdoors NSW & ACT to develop a strategy for trail and adventure riding in NSW so trail riding is treated as a legal, legitimate, healthy, sustainable, and active recreational activity,
- working to dispel the current perception of trail riding by many in the community that is based on the uncontrolled activity of a small percentage of riders who lack an appreciation of the area in which they ride.

By establishing how single track riding can be controlled to become compatible with the conservation and management objectives of the GoS SCA, this experience can then be used as a template for how single track riding can be established in other Reserves.

The Motorcycle Council of NSW looks forward to continuing to work with the NPWS so trail riding in the Gardens of Stone State Conservation Area is treated as a legal, legitimate, healthy, sustainable, and active recreational activity.

End of Document