



Conservation Council of South Australia Inc

Response to the Anstey Hill Recreation Park (Draft) Management Plan

Submission by
The Conservation Council
of South Australia Inc.
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Introduction

The Conservation Council of South Australia (CCSA) is South Australia's peak non-government community environment organisation. Formed in 1971, it is an umbrella group for around 55 of the state's diverse environment groups, who represent some 60,000 individuals.

CCSA is pleased to make a submission on Anstey Hill Recreation Park Draft Management Plan.

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Recommendations

1. That the plan clearly prioritise conservation objectives to give clear direction to management in resource allocation.
2. That the plan detail the conservation values of the reserve to enable the success or otherwise of management strategies to be evaluated.
3. That there be commitment to the achievement of priority actions within a particular timeframe.

3. Vision

4. That an appropriate vision for the park be developed.

4. Zoning:

5. That the Conservation Zone exclude dogs.
6. That the zoning guidelines state that cycling 'may' or 'might' be suitable in these zones.

8.1 Visitor Use:

7. That the proposed Vegetation Management and Fire Management Plans be developed, and approved prior to any additional or increased uses/facilities within the Park.
8. That in the provision of new facilities there should be no net loss of vegetation.
9. That in deciding upon the provision and location of visitor facilities, consideration be given to fire management requirements.
10. That in the provision of any new trails there should be no net loss of vegetation.

8.2 Visitor Access:

11. That the trails (fire and walking) system within the park's Conservation Zone be rationalised with a view to:
 12. preventing the spread of phytophthora within the park (priority)
 13. ensuring minimum disturbance to native vegetation and fauna consistent with the priorities of the vegetation management plan
 14. providing fire access consistent with identified needs in the fire management plan

8.3 Cycling:

15. That any plan to develop bicycle trails in Zones A and B must
 - be subject to the objectives and provisions of the vegetation management and fire management plans
 - include adequate measures to prevent access of bicycles into Conservation Zones (fences, bollards, gates)
 - investigate road safety issues associated with Zone B facilities
 - address how the activity/development will be independently self-sustaining in terms of ongoing management and maintenance
 - address how the activity/development will accommodate or enhance biodiversity conservation
 - address how the activity/development will complement existing regional facilities
 - be adequately resourced and managed

9.2 Mining and Exploration

16. That Anstey Hill be singly proclaimed to prevent mining and exploration.

General Comments

Management plans for reserves under the National Reserve System should clearly prioritise conservation, detail the conservation values of the reserve and how these values will be protected. While biodiversity conservation is identified as a primary purpose in the legacy statement there is a lack of clear direction within the management plan that conservation objectives should be a priority and a lack of commitment to adequate resourcing to ensure these objectives can be met.

While this is understandable given the lack of adequate resources to the Director of National Parks generally and the allocation of those resources according to regional priorities (which criteria is unspecified), this constraint should be more adequately addressed within the overall management strategy for the park. As it is, there is a total lack of clarity and, hence accountability, as to how resource use should be prioritised within the park from a year to year basis. This leads to unstrategic and reactive decision making: ie the failure to plan. For example, in the section on Vision, DEH strategy is to 'explore the possibility of partnership arrangements with agencies and organisations that have a legitimate interest in the management of this park'. While this recognises the need to engage in partnerships to address lack of resources, the failure to prioritise resource allocation and conservation objectives, leaves the targeting of such arrangements to the subjective values of staff or worse to the priorities of other agencies and organisations. The plan should give clear guidance to management as to the priority of conservation objectives so that efforts can be focused on developing the groundwork/building relationships for partnerships that will address park management priorities.

There is no accountability within the management plan. There are no performance targets or timelines against which progress might be measured. There is insufficient detail of conservation values to enable the success or otherwise of management strategies to be evaluated. While implementation of the plan is subject to annual funding and district and regional priorities, accountability for the use of resources allocated to the park (including staffing hours) can be improved by ensuring the plan prioritises actions and there is a commitment to achieving particular actions within a given time frame.

The plan should prioritise resource allocation to the development of key delegate plans ie vegetation management, fire management, trails rationalisation, to ensure decision making is adequately informed.

Cycling

There is considerable argument in the management plan for the provision of cycling facilities and an assumption that bike riders should or will be allowed in some zones in the AHRP ie there will be a bike trail development plan. This is pre-emptory, since the plan itself sets up a number of criteria for determining appropriate recreational activity/development, which have not been evaluated or addressed in the plan. It also raises concerns as to whether such an assessment will be satisfactorily undertaken.

While CCSA appreciates that the aim of developing a bicycle trail development plan is to protect wildlife habitat and landscapes currently under threat from illegal recreational activity, there is a lack of evidence to support the assumption that 'sacrifice' or 'dedicated' areas will solve this particular problem. It is doubtful that near

influence is likely to make adequate difference on days when the clubs do not have a presence in the AHRP .

This uncertainty in expected outcomes should be foreshadowed in the plan and taken into consideration when prioritising actions and resource allocations.

Cycling facilities will require extra funding for trail construction and maintenance, the provision of additional staff and the installation of infrastructure (gates and fences) necessary to keep riders in the designated zone, ensure the safety of walkers, other park users and native fauna. The provision of dedicated recreational facilities, generally, are likely to increase visitor usage of the park, with consequent issues for management and the need to reallocate resources to address this.

Given resource constraints any decision to provide additional recreational facilities needs to be carefully evaluated against opportunity costs for achieving conservation objectives. Recreational objectives can and are already being met without the addition of facilities.

CCSA is a member of the SA Trails Alliance, an alliance of conservation and recreation groups concerned with securing an ecologically and environmentally sustainable, economically viable and socially desirable network of well-managed recreational trails. Recent investigations by CCSA and other groups in the Alliance, have raised concerns regarding the 'sustainability' of bicycle trails. We have seen evidence of accelerated erosion caused by the use and abuse of both legal and illegal tracks.

CCSA hosted a meeting about the introduction of mountain bike racing and riding in AHRP with Bike SA, numbers of mountain bike clubs, Walking SA, Friends of Anstey, DEH, Friends of Parks Inc. and the North East Environmental Conservation Association (NEHECA). With representatives from most of those organizations a site visit was made to Zones A and B and discussions held to evaluate the proposal to allow bike riding in these Zones. CCSA notes strong concerns for user safety in Zone A and considerable uncertainty regarding the suitability and sustainability of this zone for bicycle riding. The concerns of existing and experienced users of this zone should be adequately addressed by DEH in its decision making processes.

CCSA also has reservation regarding the ability of bike trails to be 'independently self-sustaining in terms of ongoing management and maintenance' in steep areas in the Adelaide Hills. Members of CCSA have had the opportunity to compare progress at the Fox Creek Bicycle Park (built on Forestry land) with site visits made in 2003. During recent visits, Forestry SA and members of mountain bike clubs showed us their rehabilitation works on racing tracks and efforts at re-establishing native vegetation following the remove of forestry regrowth. The Cycle Clubs are clearly working to the best of their resources to deal with the erosion in Fox Creek. But despite some good rehabilitation having been undertaken, lack of funding and the number of workers involved have meant that, despite their ongoing commitment, there has been an increase in degradation in some of the steepest areas since 2003.

Bicycle clubs are also engaged in the development and maintenance of Eagle Quarry as a designated bike park. This development has experienced considerable delays in its completion and further funding has been made available by the Premier to enable completion of the infrastructure.

CCSA has grave concerns about the ability of bike clubs to achieve ongoing management at Fox Creek, the Eagle Quarry, and a new park in Anstey Hill RP unless they are provided with considerable financial and physical help by DEH.

Consequently, CCSA treats with caution the argument that bike riding should be permitted, other than on roads, in this or any other park under the care and control of DEH until both Eagle Quarry and Fox Creek are open to the general cycling community and

- their trails and their maintenance have been proved to be sustainable
- club members/riders have been proved able to manage cycle use so as to keep riders only within designated areas, avoid risk to other users and to themselves

Specific Comments

Section 3. Vision

The vision for Anstey Hill Recreation Park is a park that is valued by the community for its biodiversity, recreational, historic and visual amenity values. While this is a worthy vision in itself, it is not a vision for the park, but rather for the community, i.e. it is about the community valuing the park for its biodiversity, recreational, historic and visual amenity values. A vision for the park might be one which stretches towards a state where the long term conservation of its biodiversity is secured (through the protection and minimal disturbance of core conservation areas, the rehabilitation of degraded areas and the re-establishment of regional connectivity) and the community demonstrates its appreciation of the values of the park through appropriate use and participation in its management.

Section 4. Zoning

CCSA supports the provision of a Conservation or 'minimum disturbance' Zone. It would be consistent with the aim of minimum disturbance to exclude dogs as well as cycles.

CCSA supports confining more intensive or active human disturbance to designated zones (Managed Recreation Zone A & B). However, since the management plan is a 'strategic' plan dependent upon the development of delegate plans it is pre-emptory to suggest that cycling or the provision of cycling facilities will be suitable in these zones. CCSA recommends that the zoning guidelines state that cycling 'may' or 'might' be suitable in these zones.

Heritage Zones: CCSA support the protection and conservation of built heritage and associated infrastructure and planting within these zones.

5.3 Native Vegetation

It is not clear what a Phytophthora Action Plan might include. CCSA recommends that such a plan should examine how the rationalisation of trails might assist in preventing its spread within the park.

8.0 Managing Tourism and Recreation

In the provision of new trails or facilities, there should be no net loss of vegetation.

8.1 Visitor Use

CCSA recommends that in deciding upon the provision and location of visitor facilities in zones A & B, particularly picnic facilities, this be compatible with both the vegetation management and fire management plans and their requirements

8.2 Visitor Access

CCSA supports rationalising the trails (fire and walking) system, particularly within the park's Conservation Zone. CCSA recommends that the aims of such rationalisation be:

- preventing the spread of phytophthora within the park (priority)
- ensuring minimum disturbance to native vegetation and fauna consistent with the priorities of the vegetation management plan
- providing fire access consistent with identified needs in the fire management plan

8.3 Cycling

Page 21 indicates the vegetation management plan needs to be developed prior to the bicycle trails development plan. Similarly, it should be necessary that the fire management plan be developed first to ensure any bicycle trails plan is developed within this context. CCSA recommends that both be explicitly stated in the 'strategy statement' to ensure resources are prioritised to these delegate plans.

There is an assumption that the provision of dedicated cycling areas will stop illegal use of bicycles in the Conservation Zone. However, there is little evidence as yet to support this. It is likely that many current abuses of conservation areas will increase as more riders are encouraged to enter the park because they know part of it is dedicated for their use. Consequently, the design of infrastructure (eg bike fences, bollards, gates) must address the need to decrease the likelihood of cycles accessing the Conservation and Heritage zones (there are at least 6 tracks leading into other parts of the Park accessible from Zone A). This infrastructure needs to be in place before bicycle use is permitted.

Despite the commitment of Bicycle clubs to work with DEH staff to control rider behaviour, it is doubtful that it is logistically possible for them to provide adequate peer control of riders, particularly of non-members. Consequently, there remains a need for better resourcing to ensure adequate DEH staff presence to enforce rules related to 'no go areas'.

A particular consideration in Zone B needs to be road safety. It is recommended that a traffic study by Transport SA be undertaken prior to the development of the bicycle trail development plan and the provision of car parks. There is a need to ensure activities associated with taking bikes from the bottom of the racing track back up to the start will not contribute to additional road accidents on Lower North East Rd., Perseverance Rd., at future car park entrances to these roads and on associated side roads.

9.2 Exploration and Mining

CCSA opposes joint proclamation of National Parks, Conservation Parks and Recreation Parks since mining is incompatible with conservation objectives. Mining is incompatible with 'minimum disturbance' requirements associated with the Conservation Zone and CCSA recommends that the park be singly proclaimed.