



PO Box 1007 Templestowe Vic. 3106  
Phone: (03) 8846 4131  
admin@bushwalkingvictoria.org.au  
www.bushwalkingvictoria.org.au

7 May 2014

Parks Victoria Project Officer  
PO Box 400  
Rosebud Victoria 3939

Dear Sir/Madam

**BUSHWALKING VICTORIA (BWV) SUBMISSION IN RESPONSE TO THE ARTHURS SEAT STATE  
PARK MOUNTAIN BIKES DISCUSSION PAPER**

I refer to Parks Victoria's letter to me of 4 April 2014 inviting BWV's submission on the above matter. Thank you for providing BWV with the opportunity to comment on this proposal.

BWV represents the common interests of over 70 Victorian bushwalking clubs, with in excess of 8,000 members. BWV also aims to proactively represent the interests of all recreational walkers in Victoria as well as walkers visiting from interstate and overseas. One of the common interests of BWV clubs and their members is the conservation of the ecosystems and natural landscapes through which they walk, so that they can enjoy the maximum variety of native flora and fauna and unspoilt scenery and ensure their preservation for future generations.

BWV has significant concerns about several aspects of the Discussion Paper, and our reservations are set out below.

Bushwalking Victoria recognises that other trail user groups, such as mountain bikers, have a legitimate right to access natural areas for their enjoyment. However, we perceive considerable dangers in an approach that emphasises the mountain bike riding groups' interests without proper balance against the interests of other groups such as walkers.

In the Discussion Paper there is repeated reference to the Red Hill Mountain Bike Club (pages 8, 11 et seq), and the impression is given that they have been closely involved in the planning process reflected in the paper. By contrast, to the best of our knowledge, no consultation with walking groups occurred during the preparation of the paper despite the obvious impact that the proposals set out, would have on walking facilities.

Bushwalking Victoria was happy with the original arrangements in the Park whereby "Cycling was not permitted on the walking tracks due to potential conflict with walkers and possible damage to soils and vegetation" (page 2). This remains our view.

BWV totally concurs with the observations about the damaging effects of mountain bike riding in the second paragraph of Part 4 (page 4). We agree, because of these problems, with the assertion that "It is therefore essential to undertake a site-based environmental

**Better Bushwalking for Victoria!**

Bushwalking Victoria Inc. A0002548Y ABN 88 344 633 037  
Promotes bushwalking, engages in activities that add value to the community and proactively represents  
The interests of all recreational bushwalkers

assessment of mountain bike riding ... in terms of the potential impacts on the conservation ... values of the park.” We would strongly urge that this action be taken before progressing the types of mountain bike trail proposals outlined in the Discussion Paper.

We note (page 5) that the definition of Low Environmental Sensitivity areas is partly based on “high levels of weed invasion, including woody weeds, vines and scramblers” and on a “minimal history of land management to control threats and a low priority for future management”. The Discussion Paper also records (page 6), that Medium and High Environmental Sensitivity areas have low/moderate/high weed invasion, and only in High Environmental Sensitivity areas does “past and ongoing active priority management (eg pest plant and animal control)” apply.

This appears to imply that effective weed management and future environmental efforts will be solely or largely focussed on very limited areas of the park, effectively abandoning the remaining areas to ongoing infestation and degradation. If this is correct, we regard this as deeply regrettable, and do not accept that it can be used as a reason for permitting environmentally damaging activities to be carried out in these areas.

We agree (page 7) that “It is necessary to fully assess whether current mountain bike riding activity and any new trails have the potential to harm Aboriginal cultural heritage” and that “monitoring for potential discovery of cultural heritage will need to occur”. We would advocate that this research should be carried out prior to establishment of any additional trails (whether for mountain bikers or walkers).

We concur (page 8) that “The creation of new trails in areas with known infestations of *Phytophthora* is not appropriate,” and we expect that this will not occur.

We consider that section 5.1 (pages 9-10) seriously distorts walker concerns about shared trails. Walkers do not have “a general objection to sharing a trail with another type of user”. Walkers’ objections are based on concerns for mutual safety and enjoyment. Many walkers have had real experiences of near-misses on shared trails (and we recognise that our presence adds risk to users such as mountain bikers.) Particularly on narrow, winding trails, or anywhere there is limited visibility, walkers and cyclists cannot safely mix. Even where both groups act responsibly, enjoyment is compromised by the need to keep constant watch for each other.

We note (page 10) that “Mountain bike riding is not proposed to be permitted on the majority of walking tracks in the park, many of which are popular and have relatively high levels of use”, and (page 12) that the bike network is envisaged to include “limited bike riding on walking-only tracks”.

BWV does not support bike riding on any of the walking-only tracks for the reasons already given. We do however recognise that at limited ‘pinch points’ or in general access areas, sharing is reasonable. For the enjoyment of both walkers and bikers, track sharing should be minimised.

We do agree that “designating mountain bike single tracks as ‘mountain bike only’ with supportive signage and strategically-located trail head signage at car parks” is strongly advisable, and we advise all walkers always to respect such designation.

We support the use of counters and fluker post photography (page 11) to monitor mountain bike riding use and environmental effects, but we note that these are only useful when combined with a program of closing tracks where overuse and deleterious ecological effects are shown to be occurring.

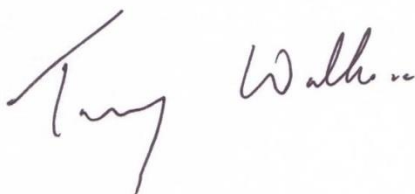
We regard restricting events to the “suitability, sensitivity and capacity of the park (page 12), to be absolutely essential.

BWV has specific concerns with the projected locations of several proposed mountain bike trails. Figure 3 depicts existing informal single bike trails, trails requiring further investigation and management trails/fuel breaks for proposed use by bikes. If this is overlaid on Figures 1 and 2 it is evident that:

- The existing informal single bike tracks traverse two high environmental value areas, and we wholeheartedly agree with the closure (page 6) of such trails;
- One of the walking tracks just to the west of the T C McKellar Circuit walk, now proposed as a bike track, crosses a conservation zone. We believe that any proposed bike trail should be re-routed away from the walking track and around the perimeter of the zone;
- Two of the management tracks proposed as bike trails which run parallel to, and to the west of Purvis Road, traverse high environmental value areas, and they should not be opened up to bikes;
- Management trails proposed as bike tracks in the very southwest of the Park traverse high environmental value areas, and they should not be accessed by bikes;
- The Concept Spur Track, now proposed as a bike trail, crosses a Management Development Area, creating dangers for visitors undertaking passive recreation in the area;
- The very northeast of the Park (adjacent to Parkdale Estate) has a popular walking track around OT Dam which it is now proposed to make accessible to mountain bike riders, and we strongly object to this proposal; and
- It appears that the proposed bike tracks will adversely affect the important ‘Two Bays’ track – to walkers, the feature long track of the Mornington Peninsula. We strongly object to any proposal which will affect this iconic walk.

BWV trusts that you will take its concerns into account when deciding upon further action.

Yours sincerely

A handwritten signature in cursive script that reads "Tony Walker". The signature is written in dark ink on a white background.

**Tony Walker**  
**President**