



18<sup>th</sup> September 2023

Planning Manager  
Management and Operations | QPWS and Partnerships  
Department of Environment and Science  
PO Box 15187  
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Email - [ParkManagementPlans@des.qld.gov.au](mailto:ParkManagementPlans@des.qld.gov.au)

Dear Madam/Sir,

### Draft Nerang Area Management Plan

Outdoors Queensland is the peak body for the outdoor recreation sector in Queensland. We represent outdoor recreation organisations and individuals in Queensland, consisting of a range of outdoor industry stakeholders, covering the four broad pillars of outdoors activities – outdoor recreation, outdoor education, outdoor health and nature-based tourism.

The mission of Outdoors Queensland is to ensure that all people have opportunities to create connections with Queensland's outdoors. Our vision is to create a world where the outdoors is a vital part of every healthy life - a healthy world comes from a balanced life, incorporating outdoor activities for all people.

Outdoors Queensland is pleased to make a submission in relation to the Draft Nerang Area Management Plan. Our aim in making this submission is to suggest possible improvements to the draft Nerang Area Management Plan. We appreciate the opportunity to provide input to this process.

The Nerang Area (incorporating Nerang National Park, Nerang Conservation Park and Nerang State Forest) is a regionally significant outdoor space, with a major focus on mountain bike riding. In addition to hosting the 2018 Commonwealth Games mountain bike riding, Nerang is identified in the Queensland Mountain Bike Strategy 2018, and its significance is stated in "Developing Mountain Biking in Queensland: Regional Solutions" published by QORF in 2015 (available online at <https://outdoorsqueensland.com.au/industry/research-master/activity-specific/mountain-biking/mtb-resources-links/>).

Section 1.1 of the Draft Nerang Area Management Plan says, amongst other things, that the stated intent of Queensland Parks and Wildlife Service (QPWS) is to keep parks, forests and reserves healthy by managing and protecting the key values.

Section 4 of the Draft Nerang Area Management Plan lists the key values for the Nerang Area as lowland rainforest, Coombabah Lake wetland area, open forests and woodlands, and mountain bike riding experience. Outdoors Queensland is pleased to see that the mountain bike riding experience is included as a key value of this location.

Outdoors Queensland is concerned that some of the strategic management directions identified in the Draft Nerang Area Management Plan will negatively impact the key value of mountain bike riding experience in the Nerang Area.



Unauthorised construction of mountain bike tracks has been identified as the primary threat for the key values of lowland rainforest, Coombabah Lake wetland area, and open forests and woodlands, with the threat rating assessed as high or very high.

Outdoors Queensland does not condone the unauthorised construction of recreational trails. We note that environmental and cultural values can be affected by the inappropriate construction of trails, and we respect the position that QPWS takes in relation to unauthorised construction of trails. However, we note that the unauthorised trails in question at Nerang Area are already constructed – decommissioning these unauthorised trails will not undo any disturbance associated with their past construction.

We submit that the correct management action is not to automatically decommission unauthorised trails, unless there has been a thorough audit conducted of the trails, which shows no other appropriate course of action. All trails, whether authorised or unauthorised, contribute to the key value of the mountain bike riding experience at Nerang, and by decommissioning unauthorised trails, that key value will be negatively impacted.

We understand that a trail audit of the Nerang Area mountain bike trails (commissioned by QPWS and undertaken by Dirt Art in 2018) indicated that the proposed trail network at that time would provide a sustainable, environmentally sensitive trail network. The Dirt Art report does not appear in the list of references provided in the Draft Nerang Area Management Plan.

Although we changes would have occurred since that Dirt Art report was prepared, it appears that the mountain bike trail network in the Nerang Area at the time of that report was quite high quality. We submit that all trails, including unauthorised trails, should be considered community assets, rather than liabilities.

In section 4.4 of the Draft Nerang Area Management Plan, “Risk to visitor safety” is included as a threatening process to the mountain bike riding experience, with the strategic management direction being to “Enhance the visitor safety of the mountain biking experience by decommissioning tracks, trails and bridges that are not part of the approved track network.” This proposed strategic management action is predicated on an assumption that all unapproved trails present a risk to visitor safety. We believe the key value of the mountain biking experience will be more threatened by the proposed loss of access to places to ride than by possible risks to visitor safety. We submit that this strategic management direction should be reworded to ensure that tracks and bridges will be assessed for visitor safety, and only decommissioned if found to be an unacceptable risk to visitor safety.

We submit that if any tracks, trails and bridges are planned to be decommissioned, that decommissioning should not proceed unless and until they have been replaced by adequate trails in more appropriate sections of the Nerang Area.

We submit that it is not appropriate to condense all mountain bike riding into the relatively small area described as Zones 3, 4 and 5 in the Draft Nerang Area Management Plan. The loss of mountain bike experience in Zone 2 will have detrimental impacts on the overall mountain biking experience for the Nerang Area, and the strategic management direction regarding maintaining mountain bike trails throughout Zones 3, 4 and 5 is insufficient to address the overall loss of experience.



We submit that mountain bike riding should be allowed as one of the activities on the multi-use/management trails throughout Zone 2.

The Draft Nerang Area Management Plan identifies construction of trails as a threatening process to some of the key values. Riding of mountain bikes on unauthorised trails has not been identified as a “threatening process”, however the proposed strategic management action is to decommission trails and prevent riding from occurring.

Outdoors Queensland understands that land managers, including QPWS, may be reluctant to approve trails that have been constructed without proper authority, since that could be seen as setting a precedent. However, we are concerned that the significant decommissioning of trails proposed in the Draft Nerang Area Management Plan could directly lead to a new outbreak of construction of unauthorised trails by frustrated members of the community. Outdoors Queensland would not support that, however we believe it is reasonably foreseeable. This type of trail construction has potential to cause more damage to the ecological and cultural values of the park than by allowing mountain bike riding to occur on existing trails that have already been built.

We acknowledge that one of the strategic management directions included in section 5.5 Visitor Management is to “Maintain visitor safety on the mountain bike trails by sustaining relationships with trail maintenance groups and volunteers.” Outdoors Queensland supports this direction, noting that successful positive relationships require shared understanding of the wants/needs of the parties involved. We believe that leadership by a responsible organisation like the local mountain bike club is a key factor in preventing future unauthorised track construction.

Section 2.5.1 of the Nerang National Park Draft Resource Information 2023 acknowledges that unauthorised track construction is related to increasing popularity and increasing demands for mountain biking at Nerang, including riders seeking more challenging experiences. Section 2.5.1 also states that an increase in outdoor recreation is expected within the next 20 years. The strategic management directions proposed in the Draft Nerang Area Management Plan do not address the current levels of demand, let alone increased demands in the future.

The Queensland Government has set out its priorities for cycling in the *Queensland Cycling Strategy 2017-2027*, as follows:

1. Building and connecting infrastructure to grow participation
2. Encouraging more people to ride
3. Sharing our roads and spaces
4. Powering the economy
5. Using research and data in decision making

The Draft Nerang Area Management Plan appears to run counter to the *Queensland Cycling Strategy 2017-2027*. The Draft Nerang Area Management Plan seems to take the following approach:

1. Decommissioning and disconnecting infrastructure to reduce participation
2. Discouraging people to ride
3. Less sharing of spaces
4. Slowing our economy (MTB tourism and local business)
5. Not using all research and data in decision making

We note that Nerang Area is accessible to a range of outdoor activities in addition to mountain bike riding, and that the Draft Nerang Area Management Plan does encompass



other outdoor activities, including in Section 5.5. This submission is focussed heavily on mountain bike riding because if approved in its current form, we believe the Draft Nerang Area Management Plan will have significant detrimental impacts on that activity.

Outdoors Queensland understands that this submission may be published as part of the consultation process. Outdoors Queensland looks forward to ongoing involvement in this process, and trusts that the outcomes will be positive. We welcome discussion on any points raised in this submission.

If there are any queries about this submission, please contact the author on 0419 976 800 or [eo@outdoorsqueensland.com.au](mailto:eo@outdoorsqueensland.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dom Courtney', with a stylized flourish at the end.

Dom Courtney  
Executive Officer

