



8 February 2022

Assessment Manager
Cairns Regional Council

RE: National Parks Association of Queensland Submission - Wangetti Eco-Trails Project (MCU)

Dear Wangetti Assessment Manager,

Thank you for the opportunity to provide a submission on the Wangetti Eco-Trails Project.

The National Parks Association of Queensland (NPAQ) is dedicated to promoting the preservation, expansion, good management and presentation of national parks in Queensland.

Established in 1930, NPAQ is an independent, not-for-profit, membership-based organisation. The association has played a pivotal role in the establishment of many national parks in Queensland. NPAQ's purpose is achieved through advocating for the protection, expansion and good management of the protected area estate in Queensland; fostering the appreciation and enjoyment of nature through a bushwalking and outdoor activities program; undertaking on-ground conservation and monitoring work; educating the community about national parks and their benefits; and supporting the development and application of scientific and professional knowledge in advancing national parks and nature conservation. The Association has some 3000 members and supporters.

The Wangetti Eco-Trails Project is a 94 km multi-use track to be built between Port Douglas and Palm Cove, primarily aimed at walkers and mountain bikers. The southern section from Palm Cove to Wangetti comprises 33 kms within Cairns Regional Council. The area is part of the Wet Tropics World Heritage Area and comprises two national parks. Some sections of the trail are for walkers only, with mountain bikers being diverted onto an alternative route. The trail will be 1.5m wide and designed for intermediate mountain biking and grade 3 hiking. The trail intersects 77 waterways. Low key accommodation is also proposed at strategic locations.

We thank the Cairns Regional Council for your transparency around the Wangetti Eco-Trails Project proposal and for making such proposals available for public scrutiny. Below we dot point NPAQ's primary concern about the proposal, the impact of mountain biking:

1. The application open for consultation is for a Material Change of Use (MCU) development permit for an 'Environmental Facility' to establish a shared use trail within Wangetti South Section B which extends from the southern section of Wangetti to Palm Cove within the Cairns Regional Council local government area. This application is made in accordance with Chapter 3, Part 2, Division 2 of the Planning Act 2016.
2. Under CairnsPlan 2016, Environment facility is the only code assessable use in the Conservation Zone which the Wangetti Eco-Trails project is allocated.
3. Under CairnsPlan 2016 the definition of Environment facility is— (a) means the use of premises for a facility for the appreciation, conservation, or interpretation of an area of cultural, environmental or heritage value; but (b) does not include the use of premises to provide accommodation for tourists and travellers. Examples of environment facility include nature-based attractions, walking tracks, seating, shelters, boardwalks, observation decks, bird hides.

4. A use which comprises active intense recreation such as mountain biking falls within the use definition of 'Outdoor sport and recreation'. Outdoor sport and recreation means the use of premises for— (a) a recreation or sporting activity that is carried on outdoors and requires areas of open space; or (b) providing and selling food and drink, change room facilities or storage facilities, if the use is ancillary to the use in paragraph (a). This is impact assessable under CairnsPlan 2016.
5. NPAQ objects to mountain biking in Wangetti, which is incorrectly described in the proposal as an Environmental facility, as it comprises active intense recreation rather than relying on the appreciation, conservation or interpretation of the cultural, environmental or heritage value of the area. Hence mountain biking should be considered as 'Outdoor sport and recreation' and incompatible with the broad purposes of national parks and the code allocated to Wangetti (as is the associated accomodation), including the local government purposes of the code as defined in CairnsPlan 2016 as:
 - a) To ensure the conservation, protection and restoration of the biological diversity, ecological integrity and scenic amenity values of land and provide for habitat connectivity.
 - b) To recognise that land within this zone is generally not suitable for further development.
 - c) To ensure that where development does occur in the zone, it does not adversely affect the environmental and scenic amenity values of the zone and is in keeping with the natural characteristics of the land.
6. Further reasons why mountain biking is incompatible in Wangetti and this area of Conservation Zone:
 - a) three critically endangered and four endangered species are known to inhabit this largely undisturbed area through which the proposed trail will traverse. As an example, mountain bikers moving at speed will potentially conflict with animals on or close to the trail such as the Southern Cassowary.
 - b) the trail will traverse 77 waterways inevitably causing disturbance to habitat of the Opal Cling Goby, and potentially erode waterways during the wet season.
 - c) the need to cater for mountain bikers will require more extensive works than if just providing access for walkers. This includes (but is not limited to) effective monitoring and maintenance of tracks to manage erosion and appropriate measures ensuring bikers do not go off track. There is no indication that additional resources will be made available to manage the trail for these.
 - d) there is no indication of any means to ameliorate potential conflict between users or that additional resources will be made available to manage the trail for potential conflicts despite an anticipated 11,000 users when the trail is fully operational. The 1.5 m wide design is supposed to cater for both users, but much will depend upon how mountain bikers use the trail. Fast speeds are possible on parts of the trail.
7. Whilst impacts will greatly vary depending upon the environment and construction details of cycling tracks in protected areas and the implementation of management plans, NPAQ supports 'nature-based cycling' in protected areas where:
 - a) the appreciation of nature is an objective.
 - b) the potential impacts (local, regional, state and national) are assessed as able to be mitigated.
 - c) entry points to trails are fitted with interpretation facilities to ensure that users are well informed of the natural and cultural values of the area and expectations of behaviour and respect for other users.
 - d) the potential conflict between bicycles and other users (e.g. walkers, bird watchers) are managed through design, construction, operation and management of the trail.

To conclude, mountain biking is incompatible with the underlying zoning for the Wangetti Eco-Trails Project. Any approval should limit cycling to passive 'nature-based cycling' rather than 'mountain biking' in accordance with the objectives of national parks, and to align with the zoning objectives in the strategic planning document for Cairns (CairnsPlan 2016).

Thank you for considering our submission.

Yours faithfully,
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