



walkingsa.org.au

Ph 0457 006 620 | office@walkingsa.org.au

Level 4, 25 Leigh Street, Adelaide SA 5000

Department for Environment and Water
National Parks and Protected Area Program
GPO Box 1047 ADELAIDE SA 5001

Via DEWProtectedAreaManagement@sa.gov.au

27 July 2023

Dear Sir/Madam,

RE: SE Coastal Lakes Proposal – The Kakadu of the South

Thank you for the opportunity to make this submission. Walking SA supports the view that the SE Coastal Lakes area has enormous environmental and cultural significance. Its unique and diverse migratory bird life, along with its resident native flora and fauna in an area rich with an ever-changing seasonal landscape, provide for a variety of sustainable uses. The potential is such, that it is not too far a stretch for the area to be recognised as 'The Kakadu of the South'.ⁱ

Walking SA represents all forms of walking in South Australia, including walking for recreation, transport and health. As the peak body, Walking SA, represent over 5000 members including walking and hiking clubs, and gives voice to the wider walking community of approximately 700,000 South Australians. Research consistently shows that walkers are the largest user groups of Parks, making up an unrivalled 89%.ⁱⁱ This statistic should be fundamental to considering a hierarchy of users and the range of use options for the SE Coastal Lakes area.

Walking SA does not seek to repeat the information it contributed to Phase 1 of this Project but does rely on and seeks to enhance that contribution. This submission should be read in conjunction with Walking SA's initial contribution (refer attached).

Walking SA holds the position that the SE Coastal Lakes environment should be managed in a sustainable way for the respectful use and shared enjoyment of multiple user groups. Primacy should be given to low environmental and cultural impact uses. There should be a focus, not only on enhanced investment in walking trails around each of the major water assets but the strategic investment, in an iconic whole of SE Coastal Lakes walking trail. With walking affording a 13:1 return on investment there would be no better outlay.ⁱⁱⁱ

Lost Opportunity

Six lakes or bodies of seasonal water make up the SE Coastal Lakes area. Walking SA expresses a concern that the SE Coastal Lakes Proposal (the Proposal) has limited the view of these bodies of water to distinct assets, rather than the substantial opportunities they offer as a collective whole.

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While DEW's own research shows the most frequent users of Parks is walkers, the Proposal offers little for this primary user group.^{iv} Indeed, there is scant comment in the site objectives for each location to suggest any significant improvement to the walk experience of the area. Despite Walking SA's comments in our initial contribution to the formation of the Proposal, the value of walkers and the walk experience of the area appears to have been largely overlooked and instead, generally expressed in the Proposal as an incidental means to afford and enable other user groups to access the sites. This may be an unfortunate and unintentional omission. In the least, it is a lost opportunity. Walking should not only be a means to access the sites for the use and enjoyment of different user groups, but importantly, walking should be recognised as a primary form of use. Walkers and trail users should have prominence in sustainable management plans due to their high prevalence, low impact on sites. In its current form, this Proposal does not appreciate this value.

In short, the vision expressed in the Proposal is too limited and fails to recognise the opportunity to attract the biggest potential user group with the broadest reach, walkers. If the opportunity is not taken at this time, it may well be lost for the foreseeable future.

Iconic not ironic

Walking SA proposes that rather than a piecemeal approach for the user experience, there should be a joined-up approach that considers the whole of the area in totality. It should be iconic, not ironic. If the full potential of the asset is not realised, the irony will not be lost. A mainstay of protection is the need for many people to know and care about an asset in its entirety. This means ensuring a whole of asset appreciation of the SE Coastal Lakes, managed in a sustainable way for multiple users. The Proposal in its current form has ironically missed this potential. Instead, it has considered the asset as a distinct set of largely unrelated sites, separated into six locations with six separate management strategies. There appears to be little acknowledgement of the need to provide linkages between the six individual sites. The Proposal should be amended to include a map and full commentary of the SE Coastal Lakes area as a whole.

There is a real risk that the perspective reflected in the Proposal has missed the iconic nature of the SE Coastal Lakes as an asset. Unfortunately, the Proposal misses the mark by focusing on day trip amenities with limited recognition of trails (ie non-vehicular access). While Walking SA supports the use of formalised tracks, there is scant reference to this in the Proposal. Instead, Walking SA would like to see a network of formalised walking trails identified, not only at each site but adding to a collective whole of area experience. In other words, there is every reason why the SE Coastal Lakes area should form, in its own right, an iconic walking trail.

The Kakadu of the South Walking Trail

Walking is South Australia's most popular activity.^v It is "the foundation of human physical activity and a universal transportation mode"^{vi} Not surprisingly, walking tourism is an increasingly popular way to experience a destination. It allows tourists to engage with local people, immerse themselves in nature and draw appreciation of the traditional culture. It also provides options for physical activities as a mainstay of the travel experience. Walking tourism can be developed with relatively small investment and in combination with the destination's unique nature and culture, it can contribute to economic development through the provision of new job and business opportunities. Ultimately, it can establish itself as an economic powerhouse for the area.^{vii}

Links to Statewide Trails Strategy

The Proposal does not appear to link to the *Statewide Trails Strategy* (the Trails Strategy). The Trails Strategy is intended to utilise trail experiences as a means to put South Australia on the tourism destination map, ultimately, as “a leading destination for trail experiences”^{viii}. This omission is disappointing. It stands in contrast to the Trails Strategy, that seeks to align with a series of existing Government Policy including *Parks 2025 Strategy*, Department for Environment and Water; *Regional Development Strategy*, PIRSA, and *Regional Visitor Strategy 2025*, SA Tourism Commission.

The *South Australian Visitor Economy Sector Plan 2030* seeks to quadruple the visitor expenditure by 2030; it is currently \$8.1 billion. The growth is projected to come from “promoting South Australia’s immersive nature and recreation experiences and new trail construction”.^{ix}

The high return on investment for walking infrastructure (13:1) makes the integration of quality walking opportunities into the tourism offer, a worthwhile investment.^x

Conclusion

Walking SA would be happy to clarify or expand on any aspect of this submission or our initial contribution during the development of the Proposal.

Yours faithfully,



Sharon Kelsey
Executive Director
Walking SA

ⁱ The appropriate naming conventions to recognise the traditional owners of the land should apply. The reference to The Kakadu of the South in this submission would need to be considered in light of this.

ⁱⁱ *Statewide Trails Strategy 2022-2032*

ⁱⁱⁱ Victoria Walks (2018) *The Economic Case for Walking*, Victoria Walks: Melbourne; Department of Main Roads (2023) *Cycling Investment in Queensland*, Queensland Government: Brisbane

^{iv} *Statewide Trails Strategy 2022-2032*

^v *South Australian Walking Strategy*

^{vi} *South Australian Walking Strategy* cites Badawi Y, Maclean F, Mason B. the economic case for investment in walking Victoria Walks, Melbourne 2018 see <http://www.victoriawalks.org.au/Economics-of-Walking/>

^{vii} *Statewide Trails Strategy*

^{viii} *Statewide Trails Strategy*

^{ix} *South Australian walking Strategy* cites Government of South Australia, South Australian Tourism Commission, *South Australian Visitor Economy Sector Plan 2030*, 2019 see <http://tourism.sa.gov.au/strategies/tourism-plan-2030>.

^x Victoria Walks (2018) *The Economic Case for Walking*, Victoria Walks: Melbourne; Department of Main Roads (2023) *Cycling Investment in Queensland*, Queensland Government: Brisbane.