



**CONSERVATION  
COUNCIL**  
ACT REGION

## **Submission: Canberra Nature Park Draft Reserve Management Plan**

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**DECEMBER 2019**

The **Conservation Council ACT Region** is the peak non-government environment organisation for the Canberra region. We have been the community's voice for the environment in the Canberra region since 1979. Our mission is to achieve an ecologically sustainable and zero net carbon society through advocacy, education, research and engagement with community, the private sector and with government.

We represent more than 45 member groups who in turn represent over 15,000 supporters. We harness the collective expertise and experience of our member groups and networks. We work collaboratively with Government, business and the community to achieve the highest quality environment for Canberra and its region.

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## Introduction

The Conservation Council ACT Region welcomes the development of the Canberra Nature Park Draft Reserve Management Plan 2019 (“the CNP Draft Plan”) and appreciates the opportunity to make comments prior to the final version being released. It has been just over 20 years since the previous Canberra Nature Park Management Plan was released in 1999, despite the previous plan indicating that it should be reviewed every ten years.

### Vision, goals and objectives

The vision statement for the CNP Draft Plan should be strengthened to put the protection of nature at its heart. In its current form, appears to illustrate a vision what CNP provides to people:

*“Canberra Nature Park enriches the lives and livelihood of a vibrant and healthy community, ensuring our natural and cultural heritage is valued and conserved forever.” (page XV)*

While acknowledging that these two outcomes are somewhat circular the vision statement could be strengthened by placing the value of the natural assets at its centre. Aboriginal custodianship of the land encompassed by the Canberra Nature Park could also be better acknowledged in the vision statement, and in the highlights on page 1 and the Minister’s statement.

Since 1999, Canberra Nature Park has increased in size from approximately 6000 ha across 27 reserves, to 11,000 ha across 37 reserves. Key additions to the Park include Gorooyaroo, Kowan Escarpment, Molonglo Gorge, Callam Brae, Jerrabomberra West and an extension to Rob Roy. The CNP Draft Plan indicates that further areas will be added to CNP (including through the inclusion of offsets) and this is welcome. With increasing urbanisation in the past 20 years, it is a credit to those who work to protect and enhance biodiversity across the ACT that Canberra Nature Park has continued to be expanded and that areas for protection continue to be identified.

However, it is important to protect and maintain the quality of the park’s ecosystems over the next decade, especially in the context of biodiversity threats through the impacts of climate change and increasing urbanisation, and given that in May this year we added to the list of threatened species in the ACT. The CNP Draft Plan lays out a comprehensive list of actions to be undertaken in the next ten years, but it is unclear from the CNP Draft Plan itself about what success will look like with regards to protection the ACT’s critically endangered Natural Temperate Grassland, Yellow-Box-Red Gum Grassy Woodland, and threatened plant, bird and fauna species.

Ecological evaluations will be, and have been collected, under the Conservation Effectiveness Management Program (CEMP), and while acknowledging that this program is complex and contains a large amount of detailed information about the status of species and habitats, it could provide baseline data from which ecological targets for the next ten years could be established.

The CNP Draft Plan provides an overarching summary of the legislative frameworks and the key issues at play. It outlines management goals and key outcomes, as well as identified a range of objectives and actions in each chapter, and prioritises them across the life of the plan in Appendix 1. Collecting the objectives, actions and priorities in one place, and potentially linking the objectives back to the goals, could make it easier to follow.

The presentation of reserve summary profiles in the Plan is helpful, however, we look forward to seeing Operational Plans for all of the reserves within the Canberra Nature Park when they are available online, as it is these that will shape activities taken within each reserve to conserve, protect and enhance biodiversity.

The Plan identifies the two key statutory objectives for the management of nature reserves (page 6):

- 1. To conserve the natural environment, and
- 2. Provide for public use for education, recreation and research.

These objectives are carried through the structure of the document in the ordering of the chapters and the discussion of issues within the chapters. However, as noted with regard to the vision statement, the primacy of environmental objectives could be more clearly stated in the introduction in simpler language. Clarity about the statutory obligations with regards to park management is important as highlighted by the Commissioner for Sustainability and the Environment, in the 2011 *Report on Canberra Nature Park*:

*“However, it is also evident that there are many different and sometimes conflicting perceptions about the purpose of our nature reserves, the appropriateness of the way we use them, and expectations we have as to how they should be resourced, supported, managed and maintained.” (page 5)*

The CNP Draft Plan does highlight, in the context of the *Planning and Development Act* that should there be an inconsistency between the application of these objectives, the second objective is subject to the first objective (page 11). Community understanding of the value of the Canberra Nature Park could be strengthened by providing a clear and simple explanation in the introduction that the protection of biodiversity and ecosystem values is the primary objective for park managers and other custodians.

The introduction (page 2) discusses the value that the CNP has to people with regards to livability, landscape brand and recreation before it highlights the ecosystem values that it holds to support life. Discussion of ecosystem benefits does not extend to the role of biodiversity, nor the intrinsic value of biodiversity more broadly.

In addition, it may also be worthwhile to be explicit about when conservation objectives do not have primacy in the context of managing CNP, for example with regard to the Emergencies Act 2014, which aims to protect and preserve life, property and the environment.

As all reserves have been identified as IUCN Category IV habitat / species management areas, the addition of outlining the actions within the management plan within the IUCN objectives is helpful (Appendix 3, page 216). The IUCN objectives set a benchmark “to maintain, conserve and restore species and habitats” - objectives which may drive management strategies that should be implemented on areas outside or adjacent to the CNP boundaries.

## Funding

The Commissioner for the Environment in her Report on the Canberra Nature Park 2011 highlighted funding issues as an ongoing challenge (page 20). Since then, the Woodlands and Wetlands Trust has been established, but general funding for the management of the Canberra Nature Park remains inadequate for the work that needs to be undertaken.

The timeliness of actions outlined in the Draft Reserve Management Plan and collated in Appendix 1 will be impacted most significantly by the funding available to undertake the actions. Many of the objectives have been discussed over a number of years, and indeed the development of a new Management Plan itself is overdue, and yet still progress made on some areas has been slow and /or limited. While some actions require precursor actions, many just require adequate resourcing to speed up implementation. Medium priority actions should be undertaken more quickly in many cases.

To achieve high quality outcomes in our reserves, the ACT Government will need to consider increasing public expenditure on nature conservation, restoration, reserve management and public education, and /or consider alternate funding models that will result in an increased budget for the management of Canberra Nature Park.

## Actions taken outside the Canberra Nature Park

The reserves of the Canberra Nature Park are scattered throughout existing and new urban development areas, and consequently are heavily impacted by human activities in and outside the park boundaries with regards to issues such as weeds, domestic animals, and tree clearing. Urban edge effects should be addressed in development processes that occur

prior to construction of new urban areas commencing. Strategic assessment approaches in planning do provide an opportunity to support the protection of the Canberra Nature Park when new developments are planned, however often urban development is at odds with conservation outcomes.

Connectivity across the Canberra Nature Park is important as acknowledged in Chapter 2, which also includes across urban areas that can be impacted by activities undertaken in other parts of the Government, for example, City Services who deliver the urban tree programs, and who are currently calling for locations to plant new urban trees. Other areas of Government would benefit for a shared understanding of the objectives in the CNP Draft Plan as their actions in other areas of Government can support the goals of the Management Plan.

## Specific chapter comments

### Chapter 2: Plants and Animals

**Landholder engagement** - Landholder actions, listed as medium, could be made a higher priority to improve outcomes. Actions in relation to strengthening land management in terms of protecting scattered trees, managing pests and managing weeds could also be given a higher priority, given the impacts of climate change and the developments that are occurring across the city's urban landscape as densification increases.

**Connectivity** - The acknowledgement in the goals that our nature reserves "are well-connected across the landscape" (page 6) is welcome. There is a need to explore possibilities for improving connections within reserves, between reserves, through the urban areas and to the wider regional landscape.

It is important to ensure integration and discussion between Directorates implementing urban tree planting projects and those who are focussing on building connectivity across and between nature reserves. Ecological imperatives could well shape the location and species of trees that are planted in order to facilitate connectivity across the city important to native birds and animal species.

**Bushfire management** - Canberra Nature Park, being so closely interwoven in urban areas, presents a challenge with regards to balancing fire management practices to support ecological outcomes and ensure safety to property and life. While property and life remain the primary objectives with regards to managing bushfires, it is important moving forward that bushfire management in the ACT (including in the Canberra Nature Park) continues to utilise the latest science to modify bushfire management to support ecological outcomes.

**Weeds and Pest** - Invasive species play a significant threat to biodiversity, and in the Canberra Nature Park this is exacerbated by the urban edge effects and park use by the community. Community understanding about the impact of weeds is important, as is ongoing investment in weed and feral pest animal management.

**Climate change resilience and managing changing weather patterns** - The focus on building resilience against the impacts of climate is strongly supported.

The actions identified are consistent with protecting the ecological integrity of the reserve but a precautionary approach is recommended with regards to maintaining and restoring diversity in ecological communities, and maintaining large, well-connected and genetically diverse populations. Work has already been done on identifying the impacts of climate change on the Canberra Nature Park (Webb, 2011) and these impacts are becoming self-evident, even without research and trials about improving resilience in species / ecological communities having been undertaken. We should not wait for certainty about how to build resilience before we put in place a framework that supports species resilience.

Work on identifying where biodiversity refugia could be useful is welcome. This includes ensuring restoration work and suitable buffers for reserve areas to protect against other ecological threats, appropriate fire management outside the reserve boundaries where required, and building connectivity between reserves, including across the urban landscape.

#### Chapter 4: Aboriginal Connection to Country

The Conservation Council supports and welcomes the priority given to Traditional Custodians of the land in the ACT, and the goal of cooperative management. We support the development of programs and projects that build collaboration with Aboriginal Custodians and the understanding of Aboriginal land practices and cultural significance.

We also support the high priority of actions that increase involvement in management activities. Projects such as Cultural awareness for staff and consulting with Registered Aboriginal Organisation and Aboriginal custodians about the naming of new reserves or dual naming of existing reserves should be a high priority as it will communicate a high priority.

We would question whether existing reserves need dual naming as this risks perpetuating the use of the English name and delays adoption of Aboriginal names.

## Chapter 6: Zoning and Access

**Conservation Zones** - Zone 1 is identified as a conservation area, however, a range of activities are listed as “not preferred” which is conditional language that implies there might be a reason for reasonably allowing the activity to occur under some circumstances. It is recommended that if these activities are not permitted, that this is clearly stated.

Alternatively, the Plan should be clear about when these activities might be allowed and the conditions that they would have to meet (as indicated in the Zone 2 column).

**Suggested changes for clarity: alternatively just change Not Preferred to “not permitted”**

Infrastructure	Zone 1: Conservation Zone	Zone 2: Conservation and landscape (general protection)
<b>Management buildings/structures**</b>  <b>for example visitor centre, parks depot, fire shed</b>	<b>Not preferred</b>  <b>Not permitted</b>	<b>Not preferred</b>  New: May be developed, but only when directly associated with specific ecological restoration, research or education.  Co-locate with existing facilities where possible.
<b>Campground**</b>	<b>Not preferred</b>  <b>Not permitted</b>	<b>Not preferred</b>  New: Only if identified in a recreation and tourism strategy.#
<b>Recreation hub**</b>  <b>for example, car park, toilet, picnic area</b>	<b>Not preferred</b>  <b>Not permitted</b>	<b>Not preferred</b>  New: Only if identified in a recreation and tourism strategy. #Co-locate with existing facilities.
<b>Utility infrastructure**</b>  <b>for example, power line, telecommunication tower, water tank, underground cabling</b>	<b>Not preferred</b>  <b>Not permitted</b>	<b>Not preferred</b>  New: Co-locate with existing services where possible.

<p><b>Sealed cycle paths** (shared use)</b></p>	<p><b>Not preferred</b></p> <p><b>Not permitted</b></p>	<p><b>Not preferred</b></p> <p>New: Co-locate with existing services where possible..</p>
<p><b>Management trails**</b></p>	<p><b>Not preferred</b></p> <p><b>Not permitted</b></p>	<p><b>Not preferred</b></p> <p>New: Only if identified as essential for management purposes.</p>
<p><b>Recreation facilities*</b></p> <p><b>for example, boardwalks, viewing platforms</b></p>	<p><b>Not preferred</b></p> <p>New: May be developed if identified in a recreation and tourism strategy.#</p> <p>Locate on previously disturbed areas, or co-locate with existing recreation facilities.</p>	<p><b>Not preferred / Permitted?</b></p> <p>New: May be developed if identified in a recreation and tourism strategy.#</p> <p>Locate on previously disturbed areas, or co-locate with existing recreation facilities.</p>
<p><b>Multi-use tracks* (unsealed)</b></p>	<p><b>Not preferred</b></p> <p>New: Only if associated with special features. Locate on previously disturbed areas.</p> <p>Existing: May be redesigned and constructed to improved standards utilising lowest impact methods.</p>	<p><b>Not preferred / Permitted?</b></p> <p>New: Locate on previously disturbed areas where possible.</p> <p>Existing: May be redesigned and constructed to improved standards utilising lowest impact methods.</p>
<p><b>Walking tracks*</b></p>	<p><b>Permitted</b></p> <p>New: Only locate on previously disturbed areas.</p> <p>Existing: Priority for track rationalisation, for example, closing informal tracks.</p>	<p><b>Permitted</b></p> <p>New: Locate on previously disturbed areas where possible.</p> <p>Existing: May be redesigned and constructed to improved standards using lowest impact method.</p>



<b>Maintenance of utility infrastructure</b>	<p><b>Permitted</b></p> <p>In accordance with an agreed code of practice.</p> <p>Routine access may be permitted if specified in a Management Agreement prepared under the Nature Conservation Act.</p> <p>Management approval is generally required for access.</p>	<p><b>Permitted</b></p> <p>In accordance with an agreed code of practice.</p> <p>Routine access may be permitted if specified in a Management Agreement prepared under the Nature Conservation Act.</p> <p>Management approval is generally required for access.</p>
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**Zone 2 paths in Zone 1 reserves** - Mt Ainslie, Mt Majura and Rob Roy have paths that have been rated as Zone 2 while the surrounding reserves is zoned in Zone 1. This is presumably to accommodate a high level of activity in the parks including that dogs are permitted on leash. Given the high conservation values of the rest of the park area, and the difficulties ensuring compliance of both keeping dogs on leash and picking up dog faeces, more public education and a higher compliance regime could be put in place in these reserves.

**Zoning for activities** - the table outlines the zoning for infrastructure however makes no reference to temporary activities that may or may not be permitted. While it is implicated that certain activities are not permitted in Zone 1 as the infrastructure required is “not preferred” no further guidance about the activities permitted is outlined in Chapter 7. It is anticipated that this would be dealt with in the Recreation and Tourism Strategy that is under development, but the CNP Draft Plan could provide some high level guidance.

#### Chapter 7: Nature-Based Experiences (recreation, health and tourism)

Canberra Nature Park has a special place in the hearts of many Canberra residents and is often identified as one of the reasons that people enjoy living in our city. Even if many people don't regularly visit the nature reserves, they might appreciate its landscape values. The park is well used for recreation and wellbeing purposes. Building an understanding of park management in the community as well as an appreciation for what the park can bring to people's lives will, ultimately, ensure that it is conserved and managed in a way that protects its important biodiversity and conservation values.

**Tourism must ensure protection of ecological values** - recreation, health and tourism activities in the Park should be sympathetic to the social and cultural values of the Park, and not put at risk the ecological values.

Building the constituency of Canberrans who have a connection to the Park into the future increases general understanding of the value that biodiversity plays in supporting our own lives, and extends understanding of the intrinsic value of the species and habitats that exist in our local region, in particular with regard to their high value given the species and habitat loss that has already occurred nationally. Understanding and knowledge about the parks values will ensure better compliance with the restrictions and guidelines that have been put in place to ameliorate human impacts on ecological values.

**Education programs** - should be well-resourced and widely available / accessible throughout the community, and also target key audiences such as schools and community groups.

**Signage** - Better and more consistent signage across the Canberra Nature Park about permitted and not permitted activities, with a link to information about what the risks are, could assist. Canberrans enter the Canberra Nature Park from a multitude of different locations, and so signage could be expensive, however this could be supported by online information / app.

**Recreational and Tourism Strategy** - The development of a recreation and tourism strategy is welcomed, and we look forward to its public release for consultation. Such a strategy must support conservation objectives as outlined above.

**Nature Play** - The opportunity of engaging young people in the Canberra Nature Park is an important one that should be developed further. There has been a focus to invest in nature play facilities across the city in urban playgrounds, yet the Canberra Nature Park easily offers up the best option for those who have graduated from the playground! With many schools and homes being so close to the Canberra Nature Park, the opportunities to offer early exposure to nature and biodiversity are significant, and would also provide opportunities to improve the health and wellbeing of young people, presenting with higher levels of overweightness and obesity, and are reporting increasing rates of anxiety.

**Health and wellbeing** - Having a connection to nature has been identified as improving well-being and mental health. Canberra is a unique city in Australia with the integration of nature throughout the urban landscape in such a prominent way, and so consistently across the city. This offers opportunities for promoting the benefits of visiting and walking in the Park, and is another avenue for building constituency around the value of the Park to people.

**Building connections to new audiences** - Initiatives to provide “culturally appropriate activities for new Canberrans to experience nature, to feel safe and develop an understanding of the ACT's natural and cultural values” are welcomed. With almost 1/3 of the ACT residents having been born in other countries, and potentially having limited

experience and understanding of what is a very different natural landscape to many other countries, it is important to share understanding of the values of CNP to wider and new audiences. This can and should also extend to people from other areas of Australia who may not easily appreciate the significance of the ACT landscape and its biodiversity.

## Chapter 8: Community Involvement

The Conservation Council strongly supports the statement that “Successful community engagement fosters stewardship - an aware and engaged community is more likely to become involved in protecting and maintaining reserve values.” Growing community engagement must be based on an understanding and appreciation of the intrinsic values of the park as well as the values the park can bring to people.

The Report on the Canberra Nature Park 2011 recommended:

***Strengthen community awareness and involvement** by developing and implementing a community education and awareness program promoting the ecological, health and social values and benefits, and appropriate uses of our nature reserves (Recommendation 1.3). COSE 2011*

**Children and young people** - Building engagement with children and young people is a powerful way to build constituency for Canberra nature reserves, and the actions identified in the Plan are welcomed.

Currently, there are occasional days of activities held for children and young people at Tidbinbilla and Mulligan’s Flat, generally during school holidays, however deeper engagement could be developed by connecting directly with schools and integrating educational opportunities into the curriculum. However, this would rely on a particular school adopting a program in what is already a very crowded space.

Another option that Parks and Conservation could consider is to facilitate an after-school / weekend junior ranger program that offers some ongoing and more meaningful pathway for young people to grow their appreciation and understanding of nature over time. Programs could extend throughout the year and be located in more easily accessible locations throughout the Canberra Nature Park, and step up the activities and educational focus as children get older.

Junior ranger programs are offered in other jurisdictions, though often as ad hoc holiday program events as well:

- <https://juniorrangers.com.au>

- <https://www.qld.gov.au/environment/plants-animals/conservation/community/land-sea-rangers/junior-rangers>

**Park Care groups** - Park Care groups provide a vital support for Canberra Nature Park, delivering on ground activities that support and protect local ecosystems, through weeding, revegetation, track maintenance and public engagement activities in alignment with the Management Plans for particular reserves.

Not all reserves in the Canberra Nature Park have a specific park care group, and the Government could play a role in facilitating the development of community groups where they do not currently exist.

To maintain respectful relationships with Park Care groups, it is important that the Parks and Conservation service provide easily accessible support, develop operational plans in collaboration with Park Care groups, and collaborate on implementation. This requires resourcing to ensure that Park Care groups can access the help they need in a timely way, including expertise and on-ground resources.

## Chapter 9: Research and monitoring

**Biodiversity monitoring and reporting** - is crucial to achieving the desired ecological outcomes for Canberra Nature Park. As discussed earlier, it would be helpful if the Conservation Effectiveness Management Plan could be utilised to develop some high level targets for the Canberra Nature Park against which the success of the Management Plan is able to be measured.

A specific budget allocation should be provided for biodiversity monitoring and reporting, and strategic and accountability indicators for biodiversity outcomes included in appropriate corporate documents including in the ACT Budget papers.

## Chapter 10: Planning, Approvals and Compliance

**Compliance** - Anecdotally it is not uncommon to hear about public activity that is in breach of the management plan objectives. There appears to be a lack of understanding, even amongst regular park goers, as to the damage that certain activities can have on local biodiversity. Dogs running off-leash, the leaving of dog faeces on the ground, walking or riding off trail, and the dumping or leaving of rubbish appear to be practices that commonly occur.

**Dogs** - Many Canberrans appreciate using the CNP as a place to walk dogs, and dog walking is allowed in 23 of the 37 reserves. It would be useful to align this information with the Zone 1 and Zone 2 Conservation Areas. For example, dogs are listed as being allowed in Mt Ainslie, which is primarily a Zone 1 Conservation Area except the path area. Once again, it would be useful for the public to have a sense of the different activities allowed in Zone 1 versus Zone 2, aside from just infrastructure.

Compliance is an issue with regards to many activities, including dog walking. Educational information as to the damage that dogs can do inside the nature park, and the risks to biodiversity, should be made more widely available, including through the Canberra-wide newsletter and in social media.

**Cat Containment** - The Conservation Council has long held the view that the ACT should introduce a forward declaration of the whole of ACT being cat containment by 2025. Domestic, unhomed, and stray cats are a significant threat to local biodiversity. Given the number of Canberra households with cats who live within 500 metres of a Nature Reserve, and the evidence that cats can roam up to 1km, cat containment is something that should be Canberra-wide, and not just new suburbs.

**Drones** - While restrictions on flying drones over the Nature Park areas are welcome, given that there are urban areas between the nature parks, there needs to be further research as to the impact on birds species across the city landscape.