



Australian Native Plants Society Canberra Region Inc

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The Manager
Canberra Nature Park Draft Management Plan Review Committee
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SUBMISSION

CANBERRA NATURE PARK MANAGEMENT PLAN REVIEW 2019

1) The Australian Native Plants Society – Canberra Region (ANPS)

The ANPS was established in 1962. ANPS is a non-profit, voluntary community organisation dedicated to the growing, conservation, preservation, promotion and appreciation of Australian native plants. ANPS has some 300 members, including many working in a professional capacity in many spheres related to native plants (e.g. ecology, botany, horticulture and entomology) as well as other closely related scientific disciplines.

The ANPS constitution prominently advocates activity in conservation through the promotion of the conservation of Australian plants and their habitats, and observing and support for laws related to the preservation of Australian native plants.

ANPS members regularly use the many units of Canberra Nature Park (CNP), both as individuals and during organised group visits. Many of our members are also volunteers in local Landcare, Parkcare, Catchment Management and similar environmentally focused NGO's. Our members as a whole greatly appreciate the environmental, social and cultural benefits of CNP, and congratulate the ACT governments efforts in maintaining the values of CNP. We acknowledge that our city is recognised internationally as a well-planned and liveable city, and a major part of that is the availability of access to nature within close proximity to most residential areas. We support every effort made by ACT governments over the years in maintaining the CNP asset.

CNP has increased in size since 1999, and the new Draft Management Plan indicates that further areas will be added to CNP as areas for protection continue to be identified, and this is welcomed. With increasing urbanisation and population growth over the past 20 years, it is a credit to those staff who work to protect and enhance biodiversity across the ACT.

The ANPS welcomes the development of the CNP Draft Reserve Management Plan 2019 and appreciates the opportunity to comment prior to the final version being released.

2) Document reviewed

The document utilised in preparation of this submission was the *Canberra Nature Park Draft Management Plan 2019*.

3) General comments on the draft plan

The following comments are in no particular order or priority.

Size of the draft plan

The draft plan is very comprehensive, but at 258 pages is somewhat daunting to assess. However, we complement the staff effort that has gone into production of the draft plan, and the obvious dedication that has been applied in its production.

Vision Statement, Goals and Key Outcomes

The vision statement states: “*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.*” The vision statement needs to acknowledge that the primary value of CNP is nature. At present, the statement seems to make people and their needs the primary focus. ANPS realises the benefits that CNP provides for residents, and agree they should be mentioned, but nature conservation is, in the end, the primary purpose.

ANPS agrees with the goals and key outcomes. The overarching principles contained in the plan are supported. The reserve summary profiles in the CNP Draft Management Plan are helpful, but individual operational plans are essential, as these indicate and focus the work activities (outcomes) to be undertaken within each unit. All the actions appear achievable.

The units of CNP have been identified as IUCN Category IV. The IUCN Category 4 objectives are to “...*maintain, conserve and restore species and habitats.*” As such, areas adjacent to CNP boundaries may be affected. An example is inner/outer asset protection zones for bushfire protection. Asset protection zones should minimally affect units of CNP. ANPS acknowledges that this is not always possible, but in planning new urban areas, affects on units of CNP must be a priority consideration. ANPS is somewhat disappointed that, as an example, issues surrounding potential impacts on Kama NR are not yet adequately resolved.

Status of reserve units

There are some units of CNP that deserve special attention. Those with higher qualities or purposes need special consideration, especially those with high conservation values or other special conservation purposes. Mulligans Flat Sanctuary is a useful example. Within the fenced boundaries of the sanctuary, the focus should be solely on conservation and the well-being of the species re-introduced to this unit. Organised recreational activities, especially where large numbers participate or attend (e.g. running, orienteering) should not be permitted in areas with special conservation purposes and should be notified as such in the final PoM.

Funding

There is little question today of the value of nature – the draft PoM itself mentions some of the benefits include “...*climate resilience, purification and detoxification of water, air and soil, nature-based experiences (health, education, tourism and recreation), aesthetic values, spiritual and cultural experiences, mental and physical health and well-being, and economic values*”, and CNP is “...*highly valued for nature-based recreation, including walking, running, dog walking, cycling, mountain biking, horse riding, and group activities such as orienteering and rogaining*”. It is therefore essential that appropriate levels of budget funding are maintained to cover the management of CNP.

The many actions contained in the Draft PoM in Appendix 1 are supported by ANPS but they will require appropriate levels of funding to ensure the actions are undertaken. It is essential that funding is maintained at a level that actions are completed within the life of the final PoM. As CNP grows (additions to the estate), budgets should be proportionately increased to ensure management activity is not spread too thinly, or that progress on the actions are limited.

ANPS recently commented on the review of the Tree Protection Act 2005. The TPA review proposes that a fee structure be implemented. The fee structure would allow for new trees to be planted, aimed at a target of some 17,000 trees over the next few years. ANPS believes that this could provide an opportunity for whole-of-government cooperation in increasing tree cover. The possibility exists that funding gained due to urban tree removals could be provided for planting on public lands, including units of CNP or offset areas adjacent to urban zones, to maintain tree cover. Planting on public lands offers a greater security of trees reaching maturity and providing future habitat.

To achieve the desired outcomes in CNP, the ACT needs to increase the annual investment in CNP for nature conservation, restoration/rehabilitation, management and public education, and consideration of alternate funding models such as that mentioned in the above paragraph will help to achieve this.

Chapter 2: Plants and Animals

Rehabilitation

ANPS welcomes and agrees with any proposal(s) for assistance in the rehabilitation of ecological communities in CNP, and supports any proposals for improving habitat for particular species of fauna and flora, especially threatened species.

Rural lands

ANPS supports land management agreements on leased rural holdings, especially in regard to mature tree protection and appropriate levels of tree recruitment (protecting younger trees), as well as general native vegetation protection. The management of pest species (plant or animal) remains an important and ongoing action on rural leases, especially as so many abut conservation areas.

Connectivity

ANPS acknowledges that while parts (units) of CNP “*..are well-connected across the landscape..*” there is considerable scope to improve connections within and between reserve areas. We also believe there is scope to improve connections through the urban zones, in a way that public land/open space are better utilised. This can be done without increasing the likelihood of unplanned fire events through a “scattered woodland” style of planting, especially with species with smooth bark. Small islands of understorey vegetation could also be utilised, especially for those species that require more shelter.

This could be achieved with better integration between Directorates, especially with those implementing urban tree planting projects and those focused on improving connectivity across and between units of CNP. This is especially so if the review of the Tree Protection Act 2005 initiates a fee structure for tree removals in urban zones, especially where new trees are unable for some reason to be replaced. This same proposal could be used in offsets created on urban zone edges.

Bushfire management

ANPS is relatively confident that the cooperation between Emergency Services and conservation agencies has led to a much better understanding of each other’s requirements, but these agencies must continue to utilise the latest science to modify bushfire management for ecological outcomes where required.

There has been considerable discussion over the recent months of severe fires in eastern Australia about utilising Aboriginal traditional knowledge of managing fuel loads on country. Some of this knowledge, if it stills exists for our local region, would be worthwhile examining. However, under the changes to weather patterns already being experienced (e.g. shorter windows for hazard reduction purposes) there may continue to be difficulty in implementing any management models.

Pest species (plant and animals)

There needs to be ongoing investment in invasive plants and pest animal management. Invasive species are a significant threat to biodiversity, and in CNP units this is exacerbated by both urban edge effects and community use. Community education and understanding about the impact of pest plants and animals is important, and includes the effects of roaming domestic animals, especially cats.

Climate change and changing weather patterns

ANPS supports any consideration and (preferably) actions that builds resilience against the impacts of climate change. The actions as identified are consistent with protecting the ecological integrity of CNP, but it is important to maintain and restore diversity in ecological communities, thus maintaining larger, well-connected and genetically diverse populations.

The impacts of climate change are already eventuating. We do not need to wait for the inevitability of further detrimental climatic change(s) – we need to establish a framework that supports species resilience. This includes restoration work, suitable buffers for units of CNP against ecological threats, and appropriate fire management outside the reserve boundaries where required.

Chapter 3: Land and Water

It remains critical to protect (and enhance where required) all river, creek and drainage corridors for biodiversity, in particular using their alignments across landscapes to improve connectivity.

Chapter 4: Aboriginal Connection to Country

ANPS supports any priority for cooperative management with traditional owners, and an increased indigenous involvement in management activities. Cultural awareness programs should be available as required.

Consultation with local indigenous organisations is supported with regard to dual naming of reserve areas, whether already existing or as new units are created.

Chapter 6: Zoning and Access

A range of activities are listed as “*not preferred*” in Zone 1 conservation areas, usually for good reason. It insinuates the activity may be permitted in some circumstances. If these activities are not desirable, it should be clearly stated. If not preferred, but could be permitted under certain conditions and circumstances, any conditions that would apply should be clearly stated.

Mt Ainslie, Mt Majura and Rob Roy units, designated as Zone 1, have paths designated as Zone 2. ANPS understands why this has been done, given the high level of human activity in these units, including dogs permitted on leash. It is, however, incongruous when considering the high conservation values of the surrounds. It would be far better to have the whole area as Zone 1, but provide more public education on user responsibility(s). Past experience of use of these areas reveal a high percentage of dogs off-lead, and wandering well into Zone 1 areas anyway.

Molonglo River Reserve and Kama Nature Reserve are not included in the CNP, but ANPS sees no logical reason for them not to be.

Chapter 7: Nature-based experiences

CNP is regarded as a special place by many Canberra residents, be it because they use it regularly or that they appreciate the landscape values it provides. It is important to continually promote the reasons for CNP management and an appreciation for what CNP provides in residents lives.

ANPS supports recreation, health and tourism activities in CNP, provided they are conducive to the social, cultural and ecological values of CNP. Permitting certain activities increases resident and visitor understanding of the value of biodiversity and the intrinsic value of the species and habitats that exist in our local region. This understanding of the values of CNP will gradually improve compliance with restrictions/guidelines to ameliorate visitor impacts on ecological values. However, compliance has an important role in this regard. Prominent and consistent signage at all entry points on permitted and non-permitted activities within all units of CNP could assist.

Anecdotal and observed instances of non-compliance is common, even among some regular users. Off-leash dogs is one of the most common offences, but off-trail riding, rubbish and greenwaste dumping also occur. There needs to be a more holistic approach to urban and peri-urban planning to reduce human pressure on CNP. Improved design of future urban areas catering for walking and cycling paths and dog parks in areas of lesser-used public open space should be examined.

Engaging younger people in the Canberra Nature Park is important. “Nature play” facilities are becoming more popular in urban playgrounds. With many urban areas being in close proximity to units of CNP, the opportunities to offer early exposure to nature and biodiversity are significant, with the added benefit of improving the health and wellbeing of young people. Connection with nature can improve well-being and mental health. Opportunities exist to promote the benefits of visiting and walking in CNP, thus building the value of CNP to residents and visitors alike.

Chapter 8: Community Involvement

ANPS agrees and supports the statement that “...*an aware and engaged community is more likely to become involved in protecting and maintaining reserve values.*” There is no doubt that community involvement with CNP increases their awareness of the intrinsic values of CNP, but an engaged community also brings many values to the CNP.

Promoting engagement by organised days of activities held for children and young people at Tidbinbilla and Mulligan’s Flat, generally during school holidays are already well established and popular. More comprehensive programs, such as junior ranger activities, may “grab” older children and increase their awareness, as well as offer potential career paths.

Park Care, Landcare and Catchment Management groups provide on-ground activities such as weeding, revegetation/restoration plantings, track maintenance, public engagement and flora/fauna observations, the latter which increases our knowledge of CNP. Actions to establish Parkcare groups for those units that currently are without care groups would be a logical development. Parkcare groups need a certain level of resources from the Parks and Conservation Service, but this small effort pays itself back many times over.

Chapter 9: Research and monitoring

It is obvious that the draft plan includes management actions firmly grounded on scientific evidence and past monitoring and reporting experience. ANPS strongly supports this approach. There should be a continuing and specific budget allocation for biodiversity monitoring and reporting.

Any outcomes of biodiversity monitoring through reporting processes should be made available to the community through appropriate channels.

Citizen science is also contributing in a significant way to our knowledge of what is found in CNP. ANPS members, and indeed many other community groups, contribute to the assemblage of this knowledge. It behoves government to not overlook the valuable resource and knowledge present in the community, both within individuals and the various community environmental organisations. The knowledge held within these community organisations has been utilised by government agencies in the past. The development and operation of Canberra Nature Map (CNM) is a major citizen science project to which the ANPS has donated some \$14,000 over the last 3 years, as we regard it as a very important project that needs to continue. We hope that the ACT government will continue to support CNM financially as well.

Chapter 10: Planning, Approvals and Compliance

Compliance is an integral part of any measures to protect CNP. If there is no preparedness to undertake compliance, then certain aspects of protection of CNP will fail, as it already is. It will also make certain members of the community more ready to ignore the legislative aspects of protective legislation.

Many Canberrans appreciate using CNP as a place to walk dogs. There are many anecdotal records, and personal observation by ANPS members, about off-leash dogs. This is despite adequate signage at the busier access points to walking trails.

Roaming cats, especially from urban areas abutting CNP, are not infrequent. It is time to take more action on domestic cats, including a declaration of all the ACT becoming a cat containment area by 2028.

To a large extent, the use of drones is an unknown quantity at present. ANPS would welcome restrictions on their use within and over CNP.

ANPS is grateful for the opportunity to comment on the draft PoM. If further advice or clarification is needed, please contact us through the Secretary, Garth Chamberlain, on secretary@nativeplantscbr.com.au

Yours sincerely



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for
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