



National Parks Association of the ACT Inc.
1960-2010

50 years of conservation, nature protection and education

The Chair,
ACT Legislative Assembly Standing Committee
on Planning, Public Works and Territory and
Municipal Services

Dear Ms Porter

INQUIRY INTO TIDBINBILLA REVISED DRAFT PLAN OF MANAGEMENT 2011

Thank you for the opportunity to make a submission to the Standing Committee in regards to the Tidbinbilla revised draft Plan of Management (draft PoM)2011.

The National Parks Association of the ACT (NPA ACT) believes that Tidbinbilla is one of the ACT's important reserves. Because of this, the NPA ACT welcomed the opportunity to have been part of the Community Reference Group for the draft PoM. The NPA ACT also made a submission in respect to the 2010 draft PoM. A copy of this earlier submission is attached for your reference.

The NPA ACT's original submission identified the following as key matters of concern in respect to the 2010 draft PoM:

- commercial vehicular tour access in the Core Conservation zone of Tidbinbilla;
- the commercial use of Nil Desperandum for accommodation;
- the management of the outcomes from the range of additional studies or investigations proposed by the PoM;
- the extent to which the community will be advised of progress in respect to the implementation of the policies and achievement of the actions proposed under the PoM;
- the lack of policies and actions in respect to the Birrigai component of Tidbinbilla.

After reviewing the revised PoM, the NPA Act would contend that most of these issues are still not adequately addressed.

1 - Commercial vehicular tour access in the Core Conservation zone of Tidbinbilla – The revised PoM (Table 5.2 pages 47 to 49) refers to the visitor experience in the Core Conservation Zone as being one where “(s)uitably prepared visitors can enjoy challenging recreational experiences in natural or natural-appearing settings.” “There would be generally low or very low levels of interaction with other users.”

NPA ACT Submission on the Revised Tidbinbilla Draft Plan of Management

However, the draft PoM also allows access to this area by commercially operated tour vehicles. Such intrusions would compromise the stated visitor experience of the revised PoM. Vehicular traffic in areas such as the Camel Back fire trail, could also compromise visitor safety

2 - Commercial use of Nil Desperandum for accommodation - One of the new management actions in the revised PoM states “prepare and implement hiring arrangements for Nil Desperandum...”. The NPA ACT would be concerned if this was interpreted to allow the use of Nil Desperandum for accommodation by commercial operators, as the NPA ACT strongly believes that the community is better served by placing commercially run accommodation outside of reserve areas.

The revised PoM states that short term hire of Nil Desperandum must be based on “provisions for the conservation of the house and its surroundings”. The NPA ACT would query the extent to which business plans and cost /benefit analysis have been conducted in respect to the decision to make Nil Desperandum available for short term hire and whether these have fully considered how to best manage the conservation of Nil Desperandum.

The provision of accommodation in Tidbinbilla, outside of Birrigai, is a vexed question, with impacts on groundwater reserves, the need to manage sewage and the potential for security to be compromised within the reserve.

3 - Management of the outcomes from the range of additional studies or investigations proposed by the PoM – The revised PoM calls for a range of additional studies and investigations. Of particular importance is the proposal for a hydrological survey (page 57) to be conducted and it is pleasing to note that the importance of this is now ranked as high (previously only medium). Many of the other proposals, particularly those involving accommodation, rely heavily on having sufficient water. The sustainability of the groundwater at Tidbinbilla will be a key limiting factor in the development of accommodation proposals.

4 - The extent to which the community will be advised of progress in respect to the implementation of the policies and achievement of the actions proposed under the PoM – Many issues have been identified as needing to be addressed in a Master Plan. The NPA ACT believes that community involvement in the development of such a Master Plan is highly desirable. The current process for the development of a master plan for the Jerrabomberra Wetlands would appear to be a good example of early and comprehensive involvement of key stakeholders.

5 - the lack of policies and actions in respect to the Birrigai component of Tidbinbilla – Birrigai at Tidbinbilla has planned an important educational role for the ACT community and it is pleasing to see that this importance has now been recognised to a far greater extent in the revised PoM.

NPA ACT Submission on the Revised Tidbinbilla Draft Plan of Management

The NPA ACT acknowledges that the revised PoM's increased emphasis on indigenous culture and interaction in the Tidbinbilla is a welcome addition to the PoM.

The NPA ACT would also like to state its support for the inclusion of the Corin Road additions into Tidbinbilla (first referred to on page 12). The NPA ACT recognises that this area is currently popular with the users of off-road vehicles and particular attention would need to be paid to the management of this aspect.

The NPA ACT would welcome the opportunity to further discuss any of the points noted above or in its original submission to the draft PoM.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Griffiths', is centered on a light-colored rectangular background.

Rod Griffiths
President

22 July 2011

Attachment – NPA ACT 26 July 2010 Submission on the Tidbinbilla Draft Plan of Management

NPA ACT Submission on the Revised Tidbinbilla Draft Plan of Management

Attachment A from NPA ACT's 26 July Submission on the Draft Tidbinbilla Plan of Management

Detailed Comments

Overall comment –

The Tidbinbilla PoM has to cover many different spheres of activity ie

- The natural and cultural worlds
- Educational facilities
- Research operations
- Captive animals
- Recreational pressures.

It also has to address the duality of the nature of Tidbinbilla from a legislative perspective, with the parts of Tidbinbilla that have a planning overlay of National Park having to be primarily managed for the conservation of the natural environment. The remaining areas of Tidbinbilla have a planning overlay of Special Purpose Reserve that has the management objective of providing for public and community use of the area for recreation and education

The NPA ACT has sought to determine whether the PoM has adequately managed to address the competing interests associated with these spheres of activity. It believes that there are obvious breaches of the conservation values of the national park area and that clear guidance on how to resolve competing interests in the special purpose reserve have not been clearly defined.

A key question will be how best to manage the combined resources of the existing TNR and Birrigai. The two areas have been managed by separate ACT departments and the amalgamation of the two areas into a separate seamlessly functioning entity will be a challenge and there is little strategic guidance in this document on how this will be achieved. The schools' education program at Birrigai is of high value and should not be lost to the ACT.

Positives

Management zones - Zoning is primarily aligned with the public land overlay categories. This has the potential to facilitate management of the zones in accordance with their legislative management requirements. However, for zones 2 and 3 which are covered by a single public overlay management objective long term management processes need to be in place to determine the relative importance of competing actions and developments.

Community involvement – The involvement of the community in Tidbinbilla has been recognised in a number of positive statements, especially in relation to weed control and cultural heritage.

It is also obvious that the PoM has been prepared to ensure that environmental and cultural considerations are given a high priority. However, there are a number of contradictions to this stance within the document. For example the allowing of vehicular access for licensed tour operators to Zone 1 and the use of Nil Desperandum for commercial accommodation.

NPA ACT Submission on the Revised Tidbinbilla Draft Plan of Management

Key Issues

Opportunities for overnight stays – Birrigai would appear more appropriate for this than the central valley. In assessing opportunities, rigorous assessment of the risks and costs associated with these proposals needs to be made. The PoM highlights that the majority of water consumed is, or will need to be, sourced from groundwater and the sustainable management of this should be a vital consideration.

Other infrastructure requirements need to be considered such as sewage and, for eco-lodges, the implications arising from the servicing of these and the availability of catering. The existence of the captive wildlife collection and the threatened species breeding programs raise security issues where people have after hours access to Tidbinbilla.

The economic viability of any accommodation proposal needs to be rigorously assessed. In regards to camping, it needs to be considered that the nearby wood Reserve camping ground is often under-utilised.

The NPA ACT's policy on commercial accommodation within conservation reserves is that such accommodation should be located outside of the reserves. Commercial accommodation is seen to be inconsistent with the aims of conservation reserves and the location of accommodation outside of the reserves has greater benefits for neighbouring communities.

The NPA ACT believes that the siting of future accommodation proposals at Birrigai will be able to expand on existing infrastructure without being intrusive on the current valley environment.

Nil Desperandum – This property is in within Zone 1 and is therefore part of the national park component of Tidbinbilla. Commercial use of the building would have the potential to impact on the natural values of Zone 1 and therefore would be inconsistent with the legislative management requirement. The comment on page 79 of the PoM ie the “Adaptive reuse of historic buildings needs to consider the implications for heritage values, management and equity issues related to community access” is particularly relevant for the assessment of the appropriateness of commercial use of Nil Desperandum. Again, it is vital that a cost/benefit analysis is conducted as part of a viability assessment of commercial accommodation proposals.

Commercial tours in zone 1 – The PoM will allow vehicular access to locked gate management trails in zone 1, subject to licencing. In considering whether this should be included as a permitted action in the PoM, it is important to assess whether such access has the potential to compromise the natural values of the national park area. Commercial vehicular access undermines the values associated with zone 1. The PoM refers to the expectation of a bush setting with few management intrusions in zone 1. This expectation would be affected by the allowance of commercial vehicular access to zone 1. Consideration also needs to be given to safety conflicts between vehicles and other users of the management trails.

NPA ACT Submission on the Revised Tidbinbilla Draft Plan of Management

Jedbinbilla rehabilitation – This will be a big task and should be conducted in a way that allows scientific outcomes to be measured. Research and community involvement are both positives that need to be further expanded in this section of the PoM. Future proposals for commercial use of Jedbinbilla should also be rejected in order to allow the area to return to its natural state.

General comments

Vision: The proposed vision is “Tidbinbilla is a unique place to explore our natural world”. This is a very poor vision statement providing no indication of the end state intended for Tidbinbilla. The PoM covers a wide range of activities which are not brought forward in this vision statement. The use of the word “unique” is hackneyed and conveys no real message. All places are unique in their own way.

Section 4 p 36: The listing of the “Community and Corporate Involvement’ before environmental and cultural values conveys an incorrect image of its relative importance compared to environmental and cultural values. The section should therefore be placed somewhere within the PoM after the chapters on environmental and cultural values.

Within the community and corporate involvement section, Conservation Volunteers Australia (CVA) is referred to over an entire paragraph but Friends of Tidbinbilla and Tidbinbilla Pioneers Association are lumped together – this downplays the significant long term contributions made by these organisations. The PoM also fails to mention that CVA is paid for its work and should not be described as a community organisation.

The provision of fee for service activities within Tidbinbilla should be subject to open tender processes with clear procurement tender evaluation principles in place to ensure value for money.

Landscape p 53 Policies – the statement that “vistas will be maintained at strategic locations to enable appreciation of the landscape values of the surrounding hills” should clearly indicate that is relevant only for zone 3.

Hydrology and Water Management p55 – It is obvious from this section that groundwater sustainability will be a limiting factor for some potential outcomes of the PoM such as overnight accommodation. However, it is noted that the action for the assessment of the sustainability of this resource is given only a medium priority while many of the actions dependent on the results of this assessment have been given high priorities.

Page 56 – The sources of the potential contamination of the water in the Sanctuary Wetlands needs to be more fully explained.

NPA ACT Submission on the Revised Tidbinbilla Draft Plan of Management

Native Vegetation p 59 Action 2 – the rehabilitation of disturbed areas in Tidbinbilla have the potential to be part of scientific research and this possibility should be considered as part of this action. Such long-term research and documentation should not be put at risk by future commercial or tourist uses for the area which have been flagged on the plan.

Pest Plants p64 – The NPA ACT supports increased community involvement in weeding and other management activities.

Burgan management p 65 – a key aspect of the management of Burgan should be the management of habitat for the Keys matchstick grasshopper as a monoculture of Burgan would not be advantageous for this significant animal.

Pest Animals p67 – the NPA ACT fully supports the recognition in the PoM of the risks posed by European wasps.

Fire Ecology p68 – the discussion of fire management does not have a reference to the ACT Strategic Bushfire Management Plan which dictates fire strategy in the ACT. The Bushfire Operation Plan is the annual works program and is not sufficient to set the long term policy of fire management in this area.

Ecological Rehabilitation p69– this should be considered as part of a scientific project to build on knowledge in respect to ecological rehabilitation. Consideration should be given to a community based approach to the rehabilitation processes, similar to Gudgenby Bush Regeneration.

Marketing and promotion p91 — there needs to be an acknowledgement of the level of government investment in the marketing and promotion of Tidbinbilla and how tourism levels would need to increase to cover these costs.

Page 93 - Commercial tour operators should always be required to prepare an environmental management plan for any proposed operations in Tidbinbilla, this is particularly relevant for zones 1 and 2. A key part of any decision process for determining whether a commercial tour can operate in Tidbinbilla should be the determination of the risks associated with the tour proposal and its impact on community use and access.

Page 94 - The objective for recreational activities is that opportunities exist for “a range of recreational activities are provided in Tidbinbilla that accord with its natural setting, its quiet and peaceful atmosphere.....” This would again contradict the allowance of commercial vehicle tours into Zone 1.

NPA ACT Submission on the Revised Tidbinbilla Draft Plan of Management

Pages 98 and 99 Orienteering and special events – the criteria for determining whether such events are appropriate.

Page 101 – Table 8.1 Commercial recreation/tourism – In zone 1, vehicular tours on public access restricted management trails should be excluded

Page 104 - In assessing whether vehicle-based camping and eco-lodge style accommodation should implemented at Tidbinbilla rigorous assessment of the issues raised must be conducted ie economic viability; water and sewerage issues; the impact of providing associated services such as catering and cleaning; security and safety; and the potential for developments to affect the objectives and policies of the PoM. In particular, proposed developments must be assessed for their impact on all users of Tidbinbilla. One of the advantages of utilising Birrigai for accommodation is that its location ensures limited impact on other Tidbinbilla users.

Page 105 Section 9 - a key outcome for education and interpretation is how best to amalgamate the different emphases of Birrigai and Tidbinbilla. Both are important in their own right and it would be a shame for the important educational role of Birrigai to be diminished.

Section 10 Research and Monitoring - This section reads more like a wish list than a management plan with many of the action plans being vague and non specific. There are no clear objectives, no timelines, and no outcomes. It talks about the captive animal program but there is not one mention of the koala, perhaps the most charismatic of all the animals at Tidbinbilla and a huge public attraction. There appears to be no plan for managing the koalas for the next 10 years. Will they be bred and released to restore the population that existed here prior to European settlement?

Why is the development of an endangered species research centre and education program associated with improved tourism and recreation opportunities (P114). If the research and education are worth doing then why make it contingent on unrelated or even detrimental activities such as tourism and recreation?

A very expensive veterinary laboratory has been built but there seem to be no plans to staff the building nor an action plan as to what work will be carried out there, only vague hopes that corporate funds might be attracted to establish something unspecified. If it was worth the government funding its recent construction then the ACT government should also be funding its use, and with a plan in place. There is no such action plan in the management plan.

The document stresses the importance of research and its use in guiding the management plan but there is no way for management or the public to easily access past research. An action plan should be included to index the past research and make it available on the

NPA ACT Submission on the Revised Tidbinbilla Draft Plan of Management

internet with an overarching discussion on how it will influence future management decisions.

There is half a page devoted to Prehistory (P 119) but no action plan follows.

There is concern that public access, even if very limited, to the captive breeding programs may breach the necessary quarantine environment surrounding the breeding of the Northern Corroboree Frog.

Page 127 – Tidbinbilla Master Plan – The concept of a master plan is supported but its development and the outcomes of any investigations should be subject to public consultation processes. In addition, there needs to be an action covering how the policies and actions will be reviewed and communicated to the public.

The relationship between the PoM, the master plan and any business plans also needs to be described within the PoM.

All master plan activities should be high priority. For example it is counter-intuitive to have a high priority for the establishment of accommodation if the location of walking trails, additional visitor facilities and wildlife collection facilities are still to be finalised. There is also a clear need for a section in the master plan on hydrology issues.

One issue not addressed in the PoM is the need for an integrated management plan for transport within Tidbinbilla, and for getting to Tidbinbilla, that reduces the current dependence on individual cars.