

# DRAFT RESERVE MANAGEMENT PLAN: CANBERRA NATURE PARK

STANDING COMMITTEE ON PLANNING, TRANSPORT AND CITY SERVICES

JULY 2021

REPORT 2



# THE COMMITTEE

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## RESOLUTION OF APPOINTMENT

On 2 December 2020 the Legislative Assembly resolved to establish the Standing Committee on Planning, Transport, and City Services.<sup>1</sup>

Under the Resolution the Committee is responsible for examining the following areas:

- City Renewal Authority;
- Suburban Land Agency;
- Planning and Land Management;
- Transport;
- City Services including waste and recycling;
- Housing (excluding service provision); and
- Building and Construction.<sup>2</sup>

## TERMS OF REFERENCE

The Committee's Terms of Reference are to 'prepare a report on the draft plan variation' as set out in Sections 181 and 182 of the of the *Nature Conservation Act 2014*.<sup>3</sup>

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<sup>1</sup> Legislative Assembly for the ACT, *Minutes of Proceedings*, 2 December 2020, pp.17, 20, available at: <https://www.parliament.act.gov.au/data/assets/pdf/0007/1669030/MoP002F.pdf>

<sup>2</sup> Legislative Assembly for the ACT, *Minutes of Proceedings*, 2 December 2020, pp.17, 20, available at: <https://www.parliament.act.gov.au/data/assets/pdf/0007/1669030/MoP002F.pdf>

<sup>3</sup> Nature Conservation Act 2014(Act), viewed 21 June 2021, available at: <https://www.legislation.act.gov.au/View/a/2014-59/current/PDF/2014-59.PDF>

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# RECOMMENDATIONS

## RECOMMENDATION 1

**4.10** The Committee recommends that the Canberra Nature Park Draft Reserve Management Plan be amended so that it will:

- set out clear, concise, and measurable propositions throughout;
- provide clear articulations across goals and actions; and
- include reserve plans, comprising measurable actions and goals, in the body of the Plan.

## RECOMMENDATION 2

**4.14** The Committee recommends that the ACT Parks and Conservation Service include in the draft reserve management plan estimated staffing and resourcing requirements in order to achieve the outcomes set out in the draft reserve management plan, and the ACT Government include in Budget Papers and Annual Reports appropriations and numbers of staff dedicated to maintaining Canberra Nature Park.

## RECOMMENDATION 3

**4.20** The Committee recommends that consultation reports for this and future management plans present all comment provided during consultation phase of the draft management plan process and that the current consultation report for the draft reserve management plan be amended to reflect comments provided during the consultation phase.

## RECOMMENDATION 4

**4.24** The Committee recommends that the ACT Parks and Conservation Service continually monitor the Reserve Management Plan for Canberra Nature Park, taking into account significant bushfire and pandemic events which have occurred since the 2019 release of the Plan for Consultation.





# 1 BACKGROUND

## PROCESS FOR DRAFT RESERVE MANAGEMENT PLANS

- 1.1 In a process similar to that used for Draft Variations to the *Territory Plan*, draft reserve management plans are prepared by ACT Government officers and presented to the relevant Minister, after which plans are exposed for comment, and a further version of the plan is produced for the consideration of the Minister.<sup>4</sup> As the Canberra Nature Park Draft Reserve Management Plan 2020 (hereafter 2020 *Draft Plan*) deals with the management of “wilderness area, national park, nature reserve, catchment area or a special purpose reserve” managed under the *Nature Conservation Act 2014*, the draft reserve management plan is prepared under the *Nature Conservation Act 2014*. Under Section 181 of the *Nature Conservation Act 2014*, the Minister must then refer the plan to ‘an appropriate committee of the Legislative Assembly, which is in this case the present committee: the Standing Committee on Planning, Transport and City Services.’<sup>5</sup>
- 1.2 According to the Environment, Planning and Sustainable Development Directorate (EPSDD) webpage ‘Reserve Management Plan’, the *Canberra Nature Park Draft Reserve Management Plan 2019* (hereafter the 2019 *Draft Plan*) made available for public comment from 23 September to 16 December 2019, in the form of a reported 99 submissions to the process.<sup>6</sup> The subsequent revised *Canberra Nature Park Draft Reserve Management Plan 2020*, was made available on the same webpage, and was listed on the *YourSay* website.<sup>7</sup>

## REFERRAL

- 1.3 On 20 January 2021 the Minister for Planning and Land Management, Mick Gentleman MLA, wrote to the Committee referring the *Canberra Nature Park Draft Reserve Management Plan*

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<sup>4</sup> A difference between the two processes is that Draft Variations to the Territory Plan are prepared by the planning and land authority under the *Planning and Development Act 2007*, s 60, while Draft Reserve Management Plans are prepared, under s 321 of the Act in combination with Part 8.3 of the *Nature Conservation Act 2014*, by the custodian of the reserve in question, in this case the ACT Parks and Conservation Service.

<sup>5</sup> *Nature Conservation Act 2014*, s 181, viewed 8 July 2021, available from: <https://www.legislation.act.gov.au/a/2014-59/>

<sup>6</sup> Environment, Planning and Sustainable Development Directorate (EPSDD), ‘Reserve Management Plan’, viewed 21 June 2021, available at: <https://www.environment.act.gov.au/nature-conservation/reserve-management-plans> and ACT Government, YourSay, ‘Canberra Nature Park’, viewed 21 June 2021, available at: <https://yoursayconversations.act.gov.au/act-parks/canberra-nature-park>

<sup>7</sup> ACT Government, YourSay, ‘Canberra Nature Park’, viewed 21 June 2021, available at: <https://yoursayconversations.act.gov.au/act-parks/canberra-nature-park>

2020 under Section 181 of the *Nature Conservation Act 2014*. The Draft Reserve Management Plan and a Consultation Report was provided for our consideration.

## REQUEST FOR DOCUMENTS

- 1.4 On 16 March 2021 we wrote to the Minister, requesting copies of public submissions to the Draft Reserve Management Plan process. After further letters, on 17 May 2021 we issued a formal request for the submissions under Standing Order 239, which we received on 25 May 2021.

## AGREEMENT TO INQUIRE FURTHER AND REPORT

- 1.5 On 17 June 2021 we agreed to inquire further and report on the draft reserve management plan. We also agreed that, due to time lost in the process of gaining access to public submissions for the plan, and the legislative requirement to inquire by 20 July 2021 if we wished to inquire into and report on the plan, we would conduct the inquiry without inviting submissions or holding public hearings: that is to conduct the inquiry ‘on the papers’.
- 1.6 This approach has brought about a change in format compared with the more usual process of inviting submissions and hearing from witnesses. When that is done, we present evidence from submissions and witnesses in a narrative and then reflect on that evidence, and make recommendations, in separate sub-sections entitled ‘Committee comment’. In this case there is no evidence that has been uniquely provided to us, and the following consideration of the draft reserve management plan is, in that sense, all ‘committee comment’.

## THE PLAN

- 1.7 The *Canberra Nature Park Draft Reserve Management Plan 2020* (the 2020 Draft Plan) is proposed as a replacement for the current *Land (Planning and Environment) Canberra Nature Park Plan of Management Approval 1999*, which came into effect more than twenty years ago.<sup>8</sup>
- 1.8 According to the 2020 Draft Plan, the Canberra Nature Park is made up of 39 nature reserves ‘protecting remnant natural vegetation’, which together cover ‘approximately 11,400 hectares in and around urban Canberra’.<sup>9</sup>

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<sup>8</sup> *Land (Planning and Environment) Canberra Nature Park Plan of Management Approval 1999*, viewed 22 June 2021, available from the ACT Legislative Register at: <https://www.legislation.act.gov.au/di/1999-163/>

<sup>9</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, pp.2, 3.

- 1.9 The 2020 Draft Plan document comprises 253 pages. Part 1 is the 2020 Draft Plan itself, with an introduction and sections on ‘plants and animals’, ‘land and water’, ‘Aboriginal connection to country’, ‘historic (non-Aboriginal) heritage’, ‘zoning and access’, ‘nature-based experiences’, ‘community involvement’, ‘research and monitoring’ and ‘planning, approvals and compliance’.<sup>10</sup>
- 1.10 The 2020 Draft Plan proposes an overarching framework of ‘management goals and key outcomes’,<sup>11</sup> and actions are listed for each section, amounting to 95 actions in total,<sup>12</sup> which are listed in a unified Table of Actions in Appendix 1 of the 2020 Draft Plan.<sup>13</sup>
- 1.11 Part 2 is made up of a series of sections on ‘reserve complexes and summary profiles’, in which the individual reserves making up the Canberra Nature Park are grouped under the headings ‘Northern Woodlands’, ‘Central Grasslands’, ‘Sandstone Reserves’, ‘Connections with rivers’, ‘Kowen Escarpment and Molonglo Gorge’, ‘Woden Woodlands and Grasslands’, and ‘Southern Hills’.<sup>14</sup>
- 1.12 For each reserve, items are listed under headings for ‘Establishment’, ‘Connectivity’, ‘Natural values’, ‘Cultural values’, ‘Recreation’, ‘Community involvement’, ‘Management’, and ‘Key actions’. These last two headings set out the primary objective in managing each individual reserve, and actions to be taken for that reserve in addition to those set out in Part 1 of the 2020 Draft Plan.<sup>15</sup>

## STRUCTURE OF THIS REPORT

- 1.13 This report ‘on the papers’ consists of the present ‘Background’ chapter; a second chapter which provides an overview of the public submissions to the 2019 Draft Plan; a third chapter summarising submitters concerns and the descriptions and responses made to those concerns in consultation report on the 2019 Draft Plan; and a fourth chapter in which we reflect on what has been considered in the body of the report, and make findings and recommendations.
- 1.14 Appendix A lists the documents the Minister provided to the Committee when he referred the Draft Plan. Appendix B sets out textual changes between the 2019 and 2020 draft plans.

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<sup>10</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, vii-ix.

<sup>11</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, pp.7-8.

<sup>12</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, pp.49-52; 59; 68-69; 76; 102-103; 111-112; and 119.

<sup>13</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, p.226.

<sup>14</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, ix-x.

<sup>15</sup> For example, see *Canberra Nature Park Draft Reserve Management Plan 2020*, ‘Goorooyarroo Nature Reserve’, p.134.

## 2 SUBMISSIONS TO THE PLAN PROCESS

### BACKGROUND

- 2.1 The relevant page for the Canberra Nature Reserve Draft Reserve Management Plan on the government *YourSay* website states that 99 submissions were received in response to the Canberra Nature Park Draft Reserve Management Plan 2019, released 23 September 2019.<sup>16</sup>
- 2.2 As noted above, we asked for a copy of these public submissions, which were provided to us on 25 May 2021.
- 2.3 This chapter considers the submissions. We note that these are different from submissions normally considered in committee reports in that they do not attract parliamentary privilege. When the Minister provided the submissions, he asked for the names of submitters to be kept in confidence. For these two reasons—the absence of privilege and the request for privacy—we have decided to identify submissions by number only. These are numbers applied by us and do not correspond with any other numbering which may previously have been applied.
- 2.4 To be clear, this chapter provides an account of submissions on the first Canberra Nature Park Draft Reserve Management Plan 2019: not the current Draft Reserve Management Plan 2020 which is the subject of the present report, and redrafted in response to these 2019 submissions. In a later part of the report the Committee considers the degree to which the Draft Plan process engaged with these views, and whether the Draft Plan 2020 represents the best possible response.

### DRAFT PLAN INTRODUCTION

#### PRIMARY FOCUS ON CONSERVATION

- 2.5 Some submitters thought that the 2019 Draft Plan did not properly reflect a statutory emphasis on conservation as the primary objective of the CNP.<sup>17</sup>

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<sup>16</sup> ACT Government, *Yoursay*, 'Canberra Nature Park', viewed 8 July 2021, available at: <https://yoursayconversations.act.gov.au/act-parks/canberra-nature-park>

<sup>17</sup> See the *Planning and Development Act 2007*, Schedule 3, Item 3, 'nature reserve', and s 315(4.)

- 2.6 One said that it was ‘puzzling’ that the initial focus of the Plan fell on the ‘impact on the ACT community’ and only then on ‘the natural values of CNP’. This was misplaced, given legislation in which gave priority to conserving the natural environment.<sup>18</sup>
- 2.7 Another agreed that conserving the natural environment should be given clear priority over ‘recreational, educational and research objectives’. While this was acknowledged in some places in the Plan, ‘the primacy of conservation would be better stressed if its status was referred to more prominently in the text’.<sup>19</sup>
- 2.8 A further submission said that clarifying the primacy of the objective was particularly important in the face of increasing pressure to extend the use of the CNP for recreational activities, which was itself evident in the 2019 Draft Plan.<sup>20</sup>
- 2.9 Other submissions agreed that the vision statement in the 2019 Draft Plan ‘should be strengthened to put the protection of nature at its heart’;<sup>21</sup> that ‘the primacy of environmental objectives’ could be ‘more clearly stated in the introduction in simpler language’; and that clarity about statutory obligations for management of the CNP was important.<sup>22</sup> While the 2019 Draft Plan indicated the principal set out in the *Planning and Development Act 2007* that if two objectives were in conflict the first took precedence (so that the imperative to ‘conserve the natural environment’ took precedence over that of providing ‘for public use of the area for recreation, education and research’), community understanding of this could be strengthened by providing a ‘clear and simple explanation’.<sup>23</sup>
- 2.10 This last submission was also critical of the 2019 Draft Plan in that, it said, this objective was not properly reflected in its Introduction, which placed greater priority on ‘the value that the CNP has to people with regards to liveability, landscape brand and recreation’ than ‘ecosystem values’. Moreover, the 2019 Draft Plan did not acknowledge ‘the role of biodiversity’ nor ‘the intrinsic value of biodiversity more broadly’.<sup>24</sup>
- 2.11 The submission also recommended that the 2019 Draft Plan should identify cases where conservation objectives did *not* take priority in the management of the CNP, such as where the

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<sup>18</sup> Submission No 40, p. [1], citing the *Planning and Development Act 2007*, Schedule 3, Item 3, ‘nature reserve’, and s 315(4). Submission numberings are those applied by the Committee to maintain the confidence of submitters to the Draft Reserve Management Plan process and do not match any other numbering sequence.

<sup>19</sup> Submission No 87, p. [1].

<sup>20</sup> Submission No 98, p. [1].

<sup>21</sup> Submission No 94, p.1.

<sup>22</sup> Submission No 94, p.2.

<sup>23</sup> Submission No 94, p.2, citing the *Planning and Development Act 2007*, Schedule 3, Item 3, ‘nature reserve’, and s 315(4).

<sup>24</sup> Submission No 94, p.3.

*Emergencies Act 2014* was engaged and so the principal imperative was to ‘preserve life, property and the environment’.<sup>25</sup>

## STRONGER FOCUS ON COMMUNITY USE AND ENJOYMENT

- 2.12 A contrary view was also expressed: that the Plan’s focus on community use and enjoyment of the CNP should in fact be strengthened. One submission said that without greater community use and thus increased community perception of the value of the CNP, elected representatives (that is, Members of the Legislative Assembly) would not see the benefits of investing in it.<sup>26</sup> Another agreed, saying that nature-based activities in the CNP that were consistent with nature conservation would help develop a culture of ‘caring for and enjoying our parks’.<sup>27</sup>

## CRITICAL VIEWS AND ANALYSIS

- 2.13 A number of submissions criticised the form and content of the 2019 Draft Plan.
- 2.14 One submission said that it would be useful to explain the concept of the CNP as a collection of reserves. The 2019 Draft Plan, as it stood, was ‘more a description of what is included’ than an explanation of why reserves were included. What was needed was ‘a broad logic ... or criteria’, ‘a clear concept or rationale’, to explain why some reserves were included and others were not.<sup>28</sup>
- 2.15 Another submission noted that seven further reserves had been added to the CNP since 1999, and suggested that there should be an analysis to consider whether these additions come from an objective of the 1999 Plan—in which case a similar objective should be added to the current Plan—or, if not, to establish what had led to them being added.<sup>29</sup>
- 2.16 Another criticized the 2019 Draft Plan for an over-reliance on ‘a uniform and generalised management approach’ across the CNP, leading to ‘a lack of detail on management actions for specific values and ... reserves’, despite including ‘useful information and broad indications’ about their management.<sup>30</sup>
- 2.17 One submission was quite critical of content and form of the 2019 Draft Plan, saying that it was ‘not clear from reading the [draft] what the intent of the document [was]’. It said that it would

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<sup>25</sup> Submission No 94, p.3.

<sup>26</sup> Submission No 23, p.1.

<sup>27</sup> Submission No 90, p. [1].

<sup>28</sup> Submission No 29, p. [1].

<sup>29</sup> Submission No 96, pp. [1-2].

<sup>30</sup> Submission No 29, p. [1].

benefit readers ‘if there was some small explanation as to the legal obligations incumbent upon the ACT Government as the custodian’.<sup>31</sup>

- 2.18 The submission said that the Draft Plan appeared to be intended as ‘a “comprehensive basis” for all stewardship decisions and actions of the next 20 years’, but that it could not be because it failed to provide ‘a single reference to soil sampling results in the entire paper’.<sup>32</sup> It also said that the 2019 Draft Plan contained ‘largely irrelevant detail’; was ‘lacking in salient facts and deductions ... in relation to fire and drought effects mitigation’; had failed to give sufficient emphasis to the ‘maximisation of community use and subsequent increased perception of value in ACT Reserves’; and that it risked ‘public devaluation of our Reserves’ by failing to give appropriate emphasis to mitigating ‘threats to life and property emanating from our Reserves’, such as bushfires.<sup>33</sup>

## REVIEW CYCLE

- 2.19 Submissions commented on the length of the review cycle for the CNP Reserve Management Plan. One said that it had been ‘just over 20 years’ since the previous 1999 Plan had been released, despite it indicating that it ‘should be reviewed every ten years’.<sup>34</sup> Another suggested that this delay might be evidence of a ‘weak commitment’ to the CNP.<sup>35</sup>
- 2.20 A third submission called for the Reserve Management Plan to be reviewed at even shorter intervals than the 10 years provided for in the *Nature Conservation Act 2014*, so as to ‘allow for a dynamic response to our changing climate’, and ‘the impacts of urban expansion on ACT’s vulnerable biodiversity’.<sup>36</sup>

## ‘PLANTS AND ANIMALS’

- 2.21 In responding to Chapter 2 of the Draft Plan 2019, submissions spoke about habitat connectivity, fire, weeds and pest animals, and climate change.

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<sup>31</sup> Submission No 23, p.1.

<sup>32</sup> Submission No 23, p.1.

<sup>33</sup> Submission No 23, p.2.

<sup>34</sup> Submission No 94, p.1.

<sup>35</sup> Submission No 98, p. [1].

<sup>36</sup> Submission No 96, p. [1].

## HABITAT CONNECTIVITY

- 2.22 One submission noted that a goal of the Draft Plan was that CNP units would be ‘well-connected across the landscape’, and said that the ‘relatively small size of each CNP unit’ increased the importance of this objective, particularly for woodlands and grasslands. This was important because individual reserves faced ‘significant pressures’ from the urban interface and climate change, and connectivity was ‘a key factor in the ability of CNP units to cope with these pressures’. It said that Section 2.4 of the Draft Plan identified ‘a number of breaks and bottlenecks’ in connectivity, and that resolving these would require a range of new approaches, including enlarging the urban tree canopy.<sup>37</sup>
- 2.23 Another submission suggested that, in order to improve connectivity, the CNP’s custodian should cooperate with Urban Parks Management to manage urban parks for conservation, including the introduction of ‘patches of understory vegetation’ and ‘allowing tree regrowth to assure succession of mature trees’.<sup>38</sup>
- 2.24 A further submission said that while parts of the CNP were to a degree connected, there was ‘considerable scope to improve connections within and between reserve areas’. It suggested that there was also scope to ‘improve connections through ... urban zones’, so that public land and open space was ‘better utilised’ to this end, which could be done without increasing fire risk by planting under a ‘scattered woodland’ approach, and by encouraging ‘[small] islands of understorey vegetation’ for species requiring additional shelter. This, it said, could be achieved through better integration between parts of government responsible for tree-planting and those responsible for the CNP.<sup>39</sup> Another submission agreed, suggesting that in building additional connectivity between reserves in the CNP, the ‘location and species’ of urban plantings should be selected to ‘facilitate connectivity across the city’ for specific native bird and animal species.<sup>40</sup>
- 2.25 One submission expressed concern about ‘particular challenges and risks’ for connectivity posed by a predator-proof fence in the Sanctuary area in Mulligans Flat and Goorooyarroo, saying that there was ‘no recognition’ of this in the Draft Plan.<sup>41</sup>

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<sup>37</sup> Submission No 40, p. [2].

<sup>38</sup> Submission No 98, p. [1].

<sup>39</sup> Submission No 100, p.3.

<sup>40</sup> Submission No 94, p.4.

<sup>41</sup> Submission No 29, p. [4].



## FIRE

- 2.26 Submitters recognised fire management as important for the CNP. One submission noted the effect of climate change and, given that much of the CNP was ‘within the built up area of Canberra’, there was a particular need for good fire management.<sup>42</sup>
- 2.27 Another agreed. The fact that CNP reserves were ‘interwoven in urban areas’ presented particular challenges in the effort to balance ‘fire management practices to support ecological outcomes’ with assuring the safety of ‘property and life’. While this last remained the primary objective in cases of fire, it was important that the ACT (including Canberra Nature Park) continued to use ‘the latest science’ so that future bushfire management could, as far as possible, be consistent with ‘ecological outcomes’.<sup>43</sup>

## WEEDS AND PEST ANIMALS

- 2.28 A number of submissions expressed concern about weeds and pest animals in the CNP.
- 2.29 One submission said that invasive species were a ‘significant threat’ to biodiversity, and that in the CNP this was made worse by urban edge effects and use by the community. As a result, community understanding about the impact of weeds was important, as was ‘ongoing investment’ in weed and feral pest animal management.<sup>44</sup> Another submission put a similar view, but highlighted the effect of ‘roaming domestic animals, especially cats’ on biodiversity in the CNP.<sup>45</sup>
- 2.30 A further submission suggested that managing pests and weeds be given a higher priority in the 2019 Draft Plan, given ‘the impacts of climate change’ and ‘the developments that [were] occurring across the city’s urban landscape as densification [increased]’.<sup>46</sup>
- 2.31 Regarding weeds specifically, one submission supported an Action in the 2019 Draft Plan to ‘Support collaborative invasive species research with research partners’, saying that such research was ‘critical’ for the CNP, in particular to identify effective approaches to weed control, including to ‘arrest the incursion of introduced grasses like African Lovegrass’.<sup>47</sup>
- 2.32 Another submission was highly critical of current weed control practice. The submitter had been monitoring Farrer Ridge for 19 years, where they had identified 199 native species. Over

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<sup>42</sup> Submission No 78, p. [1].

<sup>43</sup> Submission No 94, p.4.

<sup>44</sup> Submission No 94, p.5.

<sup>45</sup> Submission No 100, p.3.

<sup>46</sup> Submission No 94, p.4.

<sup>47</sup> Submission No 92, p.2.

that time several had disappeared from the reserve and, in the recent years grassy areas had been ‘totally overtaken’ by St John’s Wort. A previous controlled burn had ‘wiped out’ examples of another native plant species, while a further species had been subject to poisoning some years ago because, according to the submitter, rangers had been unable to distinguish native species from weeds.<sup>48</sup>

2.33 The submitter said that the reserve at Farrer Ridge had been ‘totally and utterly neglected’ for ‘many years’. While the custodian of the CNP had a legal obligation to manage the CNP, including weed ‘pest plants’ which ‘must be contained’ under ACT legislation, they had not been, and had spread ‘exponentially’ through the grassy areas of Farrer Ridge. Further evidence of neglect was ‘rubbish laying around’ in both Wanniasa and Farrer reserves which had ‘been there for years’. This submitter thought that the effort and expense put into producing the 2019 Draft Plan would be ‘much better spent actually in the field doing some useful maintenance in the Reserves’.<sup>49</sup>

2.34 Regarding pest animals, another submitter said that a subsection of the Draft Plan entitled ‘wild dogs’ had been ‘written purely from a pest animal perspective’, and failed to acknowledge that wild dogs were ‘basically dingoes (both genetically and functionally)’, which were native and were ‘actively protected as such in at least core areas of Namadgi National Park’. The control model set out in the 2019 Draft Plan for these animals was suitable for ‘primary production purposes not for conservation’ and it needed to be changed in this respect.<sup>50</sup>

## CLIMATE CHANGE

2.35 Submitters showed concern about the effect of climate change on the CNP. One submission supported a focus in the 2019 Draft Plan on ‘building resilience’ against the effects of climate change in the CNP. It said that the actions identified in the 2019 Draft Plan were ‘consistent with protecting the ecological integrity of the reserve’, but a stronger ‘precautionary approach’ was recommended for ‘maintaining and restoring diversity in ecological communities’, and maintaining ‘large, well-connected and genetically diverse populations’. It said that research had already been done on the effects of climate change on the CNP; that these effects were evident, even without further research; and that the ACT ‘should not wait for certainty’ before establishing a framework to support ‘species resilience’.<sup>51</sup>

2.36 The submission said that part of the climate change response should be to identify places suitable for biodiversity refuges; work on restoration; identification of ‘suitable buffers for

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<sup>48</sup> Submission No 2, p. [1].

<sup>49</sup> Submission No 2, p. [1].

<sup>50</sup> Submission No 66, p. [1].

<sup>51</sup> Submission No 94, p.5.

reserve areas'; fire management outside reserve boundaries where necessary; and 'building connectivity between reserves, including across the urban landscape'.<sup>52</sup>

## 'LAND AND WATER'

- 2.37 Regarding Chapter 3, 'Land and water', one submission commented on Section 3.2, 'Geology, soils and land surface condition', saying that the inclusion of geological features was welcome because this was often omitted from discussion of 'nature' and 'natural values'. However, there was no indication in the section about *why* these things were valued. More about this would help readers 'to understand their inclusion in the plan', and would highlight the fact that geological features were in fact the 'foundation for all land form, earth and water movement, soils, vegetation and human use'.<sup>53</sup>
- 2.38 The submission welcomed the approach set out in the 2019 Draft Plan for 'identification, mapping, protection; and interpretation to increase community understanding' of geological features, and an objective to protect them from 'unnecessary disturbance', however noting that 'without an expression of why such features have value', the term 'unnecessary' would be 'wide open to misuse'.<sup>54</sup>
- 2.39 As noted above, another submission identified a shortfall in the 2019 Draft Plan's attention to geographical features, arguing that the absence of references to soil sampling would undermine the apparent intent of the 2019 Draft Plan to be the "comprehensive basis" for all stewardship decisions and actions of the next 20 years'.<sup>55</sup>

## 'ABORIGINAL CONNECTION TO COUNTRY'

- 2.40 Submitters' comments on Chapter 4, 'Aboriginal connection to country', were supportive of the 2019 Draft Plan's emphasis on working with Traditional Owners and pursuing cooperative arrangements for management of the CNP.
- 2.41 One submission was in favour of programs that would support a collaborative approach with Traditional Owners and increase understanding of Aboriginal land practices and cultural significance, and of consulting Aboriginal organisations and custodians about the naming or re-naming of reserves.<sup>56</sup>

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<sup>52</sup> Submission No 94, p.5.

<sup>53</sup> Submission No 29, p. [2].

<sup>54</sup> Submission No 29, p. [2].

<sup>55</sup> Submission No 23, p.1.

<sup>56</sup> Submission No 94, p.5.

- 2.42 According to another submission, in order for this to be effective the 2019 Draft Plan must use ‘specific language’ so that there was ‘an ongoing, empowering plan to actively and meaningfully engage with Traditional Custodians in decision making and management of the land’.<sup>57</sup> It expressed concern about other aspects of implementation, saying that in the Draft ‘the actions [did] not seem to reflect the objectives’. A case in point was the objective to create a ‘healthy country Traditional Custodian council ... to guide management of Canberra Nature Park’. This, it said, was not supported by specific indications about the terms of reference or constitution of such a council. There was no other action in the 2019 Draft Plan to create a council, nor was it referenced in any of the other actions. The submission argued that it was ‘vital to ensure that Aboriginal people [were] meaningfully and actively engaged in the management of their land’. The chapter needed to be expanded to ‘adequately reflect clear objectives, actions’ and ‘clear, measurable goals to evaluate’.<sup>58</sup>
- 2.43 Another submission also identified a gap between policy and implementation. It said that Mt Taylor had many confirmed Aboriginal places that were not heritage-registered, and that these could only be protected if the custodian was to invest in ‘a comprehensive cultural survey of CNP units in partnership with Traditional custodians’. It said that this work was ‘way overdue’; that without this there was a risk of ‘further losses ... of these places and artefacts’; and that the policies and objectives in Section 4.7 of the 2019 Draft Plan were ‘meaningless’ without this.<sup>59</sup>

## ‘HISTORIC (NON-ABORIGINAL) HERITAGE’

- 2.44 A comment on Chapter 5, ‘Historic (non-Aboriginal) heritage’, said that the 2019 Draft Plan should set out an intention to manage all ‘heritage places and objects’, and not just those identified as ‘significant’ on the Heritage Register. Relying too heavily on Register entries would put at risk ‘any place that [had] not been identified, assessed or listed’, in that it implied a lack of value for that place. In fact, it suggested, many unlisted places had great value for interpretation and education. While there was potential for this to be clarified in ‘an overarching cultural heritage management system’, for the sake of clarity it was necessary to be explicit about this in the 2019 Draft Plan. The submission also said that the 2019 Draft Plan, as it stood, failed to help its readers understand the basis for decisions about ‘significance’, leaving open questions as to who made those decisions, and what criteria were applied.<sup>60</sup>

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<sup>57</sup> Submission No 96, p. [5].

<sup>58</sup> Submission No 96, p. [5].

<sup>59</sup> Submission No 92, p.2.

<sup>60</sup> Submission No 29, pp. [2,3].

## ‘ZONING AND ACCESS’

- 2.45 Submissions on Chapter 6, ‘Zoning and Access’, made significant comment on the zoning model. This was regarded as one of the most controversial elements of the Draft Plan.

### RATIONALE

- 2.46 As one submission noted, the 2019 Draft Plan proposed 2 management zones: Zone 1 Core Conservation, for areas with high conservation values, sensitive to disturbance; and, Zone 2 Conservation and Landscape: areas more robust in relation to disturbance. Approaches to management depended on whether land was categorised in one or other of the zones, each of which made up a similar proportion of the CNP as a whole. A range of infrastructure activities were to be permitted in areas in Zone 2, which was considered more ‘resilient’ and thus better able to deal with disturbance, while they were ‘not preferred’ in Zone 1.<sup>61</sup>
- 2.47 The submission said that this approach was different from that adopted by the 1999 Park Plan, which made provision for 4 zones — multiple use, intensive recreation and tourism, facilities and urban edge buffer — in which each zone was managed according to permitted uses indicated in a table, and agencies and parties were to work ‘cooperatively’ on boundary management.<sup>62</sup>
- 2.48 The submission suggested that the 2019 Draft Plan be amended to provide an explanation and rationale for the change in zoning between the two Plans, and an account of the improvements the new zoning categories would bring about.<sup>63</sup>

### COMMENT ON ‘RESERVE MANAGEMENT ZONES’

- 2.49 Comment in submissions on ‘Reserve management zones’ (Section 6.1 of the Draft Plan) noted that the CNP comprised many different reserves and as a result had ‘a significant urban interface’, which was another ‘key risk’ to the long-term sustainability of the CNP. Provision for zoning in Chapter 6 was important for ‘identifying areas of high conservation values within CNP’ and for ‘identifying and regulating ... permissible activities within each of the two zones’. However, the sustainability of the CNP was significantly affected by ‘activities and threats’ from outside its boundaries, and the 2019 Draft Plan would be improved if it took these into account.<sup>64</sup>

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<sup>61</sup> Submission No 96, pp. [3-4].

<sup>62</sup> Submission No 96, pp. [3-4].

<sup>63</sup> Submission No 96, p. [4].

<sup>64</sup> Submission No 40, p. [2].

- 2.50 A number of submissions took issue with the language employed in the 2019 Draft Plan to refer to activities in the two zones. Two submissions noted that Zone 1 was intended as a conservation area, however a range of activities was indicated as 'not preferred', which appeared to be 'conditional language' which implied that 'there might be a reason for reasonably allowing the activity to occur under some circumstances'. They said that if these activities were not to be permitted, this should be 'clearly stated', but if, on the other hand, such activities may be allowed, the 2019 Draft Plan should be clear about this and the conditions to be met before they could go ahead.<sup>65</sup>
- 2.51 Another submission disagreed with the use of the term 'robust' in the characterisation of CNP Zone 2 areas. It said that the use of the term was 'confusing' because a robust system 'would withstand to a certain degree the impact of damaging actions and events'. 'Robust' in nature was similar to 'resilience', which would be applied to 'a healthy, unmodified and highly diverse system that recovers after damaging events'. Taking into account the fact that Zone 2 areas had, by definition, already been damaged or disturbed, the submission proposed that the Draft Plan use a less confusing descriptor for Zone 2.<sup>66</sup>
- 2.52 A further submission proposed a stronger approach. It said that because the prime objective of nature reserves in the ACT was conservation, notations on activities in Zone 1 should be changed from 'not preferred' to 'not permitted', particularly for those activities 'likely to have a greater impact on a sensitive ecosystem'. For Zone 2, activities should be for the most part indicated as 'not preferred', particularly where it was 'likely that future activities [would] degrade the values of the nature reserve' and be inconsistent with the objective of conserving the natural environment. It suggested that some of the activities in the 2019 Draft Plan were linked to a 'recreation and tourism strategy', but without seeing the strategy it was difficult to suggest 'a more nuanced approach'.<sup>67</sup>

## ANTICIPATED CHALLENGES

- 2.53 Submissions identified challenges in administering the proposed two-zone structure for the CNP. One acknowledged 'the desirability of identifying zones where the highest priority [was to be] given to conservation', but said that the locations of some zones was likely to be 'quite problematic', in particular for fire management. This was particularly the case for the Black Mountain, Mount Ainslie, Mt Majura and parts of the Red Hill reserve, where there should be further consideration of the 'practicability and desirability' of zoning before the 2019 Draft Plan was finalised.<sup>68</sup>

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<sup>65</sup> Submission No 94, p.6, and see table pp.6-8, and Submission No 100, p.4.

<sup>66</sup> Submission No 98, p. [3].

<sup>67</sup> Submission No 96, p. [4].

<sup>68</sup> Submission No 78, pp. [1-2].

- 2.54 The submission identified various parts of this problem. First, although the 2019 Draft Plan acknowledged the priority of a Strategic Bushfire Management Plan (SBMP), if there were a conflict between an SBMP and a reserve management plan, there was in practice 'likely to be ongoing debate about the use of prescribed fire' for fuel management in areas zoned Core Conservation. For Red Hill, for example, the Plan indicated that 30% of the reserve was managed as an inner and outer asset protection zone, but the proposed Core Conservation Zone overlapped with these 'very significantly'. Given the repeated burns necessary to meet prescribed fuel standards, there would be 'ongoing conflict' about prescribed burns if the whole area were to be zoned Core Conservation.<sup>69</sup>
- 2.55 From this, the submission added, it appeared that the location of fire management zones had not been taken into account when determining zoning for Red Hill, Black Mountain, Mt Ainslie and Mt Majura, 'all of which [had] significant areas of either outer asset protection zone or strategic firefighting advantage zones within the proposed new zones'. This was also a potential problem for the proposed Core Conservation Zone on the Kowen Escarpment, which needed to be 'actively managed to reduce fuels' to protect the Kowen pine plantation from 'a wildfire originating along the Sutton Road'. These arrangements needed further consideration and should be considered by the ACT Bushfire Council before the Plan was finalised.<sup>70</sup>
- 2.56 Second, while policies in the 2019 Draft Plan provided that management trails and multi-use tracks were 'not preferred', and that existing walking tracks would be a 'priority for rationalisation including closing', this raised 'a significant potential conflict' for areas zoned under the SBMP as inner or outer asset protection zones or areas zoned for 'strategic firefighting advantage', given the importance of these tracks for firefighting.<sup>71</sup>
- 2.57 Given climate change, there were likely to be more frequent and intense fires, and it was 'critical' that reserves close to urban areas had 'a good network of well-maintained management trails and walking trails'. Multi-use trails and walking tracks provided fire managers with a capacity to conduct small burns in reserves 'in a safe manner'.<sup>72</sup>

## DISTINCTIONS BETWEEN ZONES

- 2.58 Another submission expressed concern about distinctions between zones, regarding the remedies and protections available under the system.
- 2.59 The submission said that the differences between Zone 1 and Zone 2 regarding construction and reserve infrastructure were 'practically non-existent or very weak' due to use of the

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<sup>69</sup> Submission No 78, p. [3].

<sup>70</sup> Submission No 78, p. [3].

<sup>71</sup> Submission No 78, p. [3].

<sup>72</sup> Submission No 78, p. [3].

formulation 'not preferred', which implied that infrastructure construction could take place 'if the right reason [could] be found'. A recent illustration of what could take place, if this were maintained, was the construction of gas pipelines in the reserve at Mt Majura to service a police facility in Majura valley due to 'financial constraints'—on land categorised as Zone 1 under the proposed system.<sup>73</sup>

- 2.60 Moreover, high voltage power lines, water reservoirs and pipes, gas pipes, and communications cables and towers were already situated in the Mounts Majura and Ainslie nature reserves which were 'entirely' Zone 1 conservation areas. As a result, the submission said, there should be a Code of Conduct for operators and maintenance work, which provided an obligation to restore if damage occurred during works. There had been cases in the past where such restoration work either did not take place or was inadequate due to lack of supervision and follow-up, and changes in staff at the Parks and Conservation Service.<sup>74</sup>
- 2.61 It was also difficult to see how improvements could be sought for Zone 2 areas as, if 'potential damaging human activity' were to be concentrated in Zone 2 areas, improvements 'may be difficult to achieve' due to 'the continuation of ... damaging impact'. Moreover, given limited resources, land managers were more likely under this regime to prioritise conservation work in Zone 1 areas, to the detriment of those in Zone 2.<sup>75</sup>

## OTHER ISSUES AND ANOMALIES

- 2.62 A number of submissions identified what they saw as anomalies in zoning, especially for particular reserves or parcels of land.
- 2.63 One submission said that three areas within the Mulligans Flat and Goorooyarroo reserves that were classified as Zone 2, for 'potentially more intensive recreation use/impact', whereas these were in fact offset sites; had 'significant areas of threatened species habitat'; and should be reassessed.<sup>76</sup> Another agreed, saying that the Mulligans Flat and Goorooyarroo reserves should be zoned entirely as Zone 1 to reflect 'natural conservation values'.<sup>77</sup> Between them, the submissions identified habitats for the Golden Sun Moth, the Striped Legless Lizard, and the Superb Parrot in these reserves.<sup>78</sup> The second submission also identified 'inconsistent zoning' along the south-east boundary of Mulligans Flat with Goorooyarroo, saying that it was

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<sup>73</sup> Submission No 98, p. [3].

<sup>74</sup> Submission No 98, p. [3].

<sup>75</sup> Submission No 98, p. [3].

<sup>76</sup> Submission No 69, p.5.

<sup>77</sup> Submission No 98, p. [3].

<sup>78</sup> Submission No 69, p.5, Submission No 98, p. [3].



‘not comprehensible that Zone 1 [would] abruptly [stop] along the border with another reserve’.<sup>79</sup>

- 2.64 Another submission said that Molonglo Gorge and Kowen Escarpment Nature Reserves did not have Activities Declarations (ADs) applied to them under chapter 10 of the *Nature Conservation Act*, and as a result were ‘largely unprotected’. The National Capital Authority was ‘basically silent on recreational activities’ and ‘making an area a reserve alone in the ACT [was] not sufficient to properly protect it’. In light of this, the submission said that the 2019 Draft Plan should recommend that ADs were created for the Molonglo Gorge and Kowen Escarpment Nature Reserves, and for others where ADs had not been created, including Melrose, Kinlyside, Jaramlee / West MacGregor, and Justice Robert Hope Park.<sup>80</sup>
- 2.65 This submission also said that the 2019 Draft Plan ‘should recommend that any adjoining or nearby unreserved areas managed by PCS for conservation be reserved and managed as part of CNP’. There were a number of these areas, including environmental offsets, which were not protected because they were not reserved, and this was ‘problematic’, particularly when the managers sought to deal with such problems as wilful damage.<sup>81</sup>
- 2.66 Another submission noted zoning anomalies for Mount Majura and Mount Ainslie reserves, which were ‘high conservation value nature reserves’, zoned entirely Zone 1, yet experienced ‘some of the most intense usage’ of any reserves in the CNP,<sup>82</sup> including:
- from daily visitation (walking, running, dog walking, horse riding, bike riding) to big organised events (bike races such as the Capital punishment race within the two nature reserves with over 1000 participants, marathon running, orienteering, etc)<sup>83</sup>
- 2.67 These were also the only Zone 1 core conservation reserves where dog walking, horse riding, and bike riding was permitted, creating a further perception that the application of zones was inconsistent.<sup>84</sup>
- 2.68 In a related comment, another submission suggested that recreational activities where participants left tracks, such as orienteering or rogaining, should be excluded from high conservation-value parts of reserves, or where there were ‘highly erodible soils’.<sup>85</sup>

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<sup>79</sup> Submission No 98, p. [3].

<sup>80</sup> Submission No 66, p. [2].

<sup>81</sup> Submission No 66, p. [1].

<sup>82</sup> Submission No 98, p. [3].

<sup>83</sup> Submission No 98, p. [3].

<sup>84</sup> Submission No 98, p. [3].

<sup>85</sup> Submission No 98, p. [4].

- 2.69 A further submission noted that the Molonglo River and Kama Nature reserves should be part of CNP, suggesting that there was 'no logical reason for them not to be'.<sup>86</sup>

## COMPLIANCE

- 2.70 A number of submissions raised concerns about compliance with rules and regulations in the CNP. One submission said that adequate resources were needed for monitoring and compliance in CNP reserves to ensure that the effects of visitation on environmental values were minimised.<sup>87</sup>
- 2.71 Another expressed support for recreation, health and tourism activities in CNP, 'provided they are conducive to the social, cultural and ecological values of CNP'. Permitting 'certain activities' increased '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' would 'gradually improve compliance with restrictions/guidelines to ameliorate visitor impacts on ecological values'. Compliance with rules of use had an important part to play, and this could be supported through 'consistent signage at all entry points on permitted and non-permitted activities within all units of CNP'.<sup>88</sup>
- 2.72 At present, the submission said, non-compliance was 'common, even among some regular users', including the walking of dogs off-lead, which was 'one of the most common offences'; off-trail riding; and rubbish and green-waste dumping. A 'more holistic approach' to urban and peri-urban planning would reduce human pressures on the CNP, and to this end improved design of future urban areas, including walking and cycling paths and dog parks should be considered.<sup>89</sup>
- 2.73 Another submission noted that while the 2019 Draft Plan provided best practice advice for dog walking, horse riding, and bike riding, there was 'no proposition for compliance enforcement'. While the 1999 Plan stated that dogs off-lead were not permitted, the 2019 Draft Plan did not. The submission estimated that 50 to 60 per cent of dogs were walked off-lead in the Mt Majura and Mt Ainslie reserves; that a 'large number' of bike riders used or created informal tracks; and that horses were frequently ridden on informal tracks and in grassed areas.<sup>90</sup>
- 2.74 A further submission noted that in the 2019 Draft Plan the Mt Ainslie, Mt Majura and Rob Roy reserves had been categorised Zone 1, but had paths classified as Zone 2. While this was understandable due to high levels of human activity in these reserves, it was 'incongruous' in

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<sup>86</sup> Submission No 100, p.4.

<sup>87</sup> Submission No 69, p.3.

<sup>88</sup> Submission No 100, p.4.

<sup>89</sup> Submission No 100, p.4.

<sup>90</sup> Submission No 98, pp. [3-4].

light of ‘the high conservation values of the surrounds’. A better approach, it suggested, would be to classify the whole area Zone 1 and provide more public education on user responsibilities.<sup>91</sup>

## ‘NATURE-BASED EXPERIENCES’

- 2.75 Submissions on Chapter 7, ‘Nature-based experiences’, made comment on: managing the impact of visitation on the CNP; emphasis on visitation versus conservation for the CNP; tracks and trails; booked group events; dog walking; and broader concerns on the effects of visitation and approaches to mitigation.

## ‘WELCOMING VISITORS AND MANAGING IMPACTS’

- 2.76 Comment on Section 7.1, ‘Welcoming visitors and managing impacts’, was mostly concerned with striking a balance between access and conservation as the primary objective of the CNP.
- 2.77 One submission said that the CNP was ‘well used for recreation and wellbeing purposes’ and that building community awareness about the CNP would, ‘ultimately, ensure that it [was] conserved and managed in a way that [protected] its important biodiversity and conservation values’. However, it was important that ‘recreation, health and tourism activities’ in the CNP not be pursued to the detriment of its ecological value.<sup>92</sup>
- 2.78 Canberra, it said, was unique in Australia in the way nature was integrated into the urban landscape. It expressed the hope that building a constituency with a sense of connection to the CNP would increase understanding of the value of biodiversity, local species, and habitats, and that this understanding would lead to better compliance with restrictions and guidelines and mitigate human impact.<sup>93</sup>
- 2.79 Another submission welcomed the announcement in the 2019 Draft Plan that the Environment, Planning and Sustainable Development Directorate (EPSDD) was developing a recreation and tourism strategy. It said that this was something that this organisational submitter had lobbied for ‘over a long period’; that such a strategy must be driven by conservation of nature as the primary management objective for ACT national park and nature reserves, and that it should address ‘recreation and nature based tourism opportunities across the whole of the ACT and not just within conservation reserves’.<sup>94</sup>

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<sup>91</sup> Submission No 100, p.4.

<sup>92</sup> Submission No 94, p.8.

<sup>93</sup> Submission No 94, p.9.

<sup>94</sup> Submission No 40, p. [2].

## ‘TRACKS AND TRAILS’

- 2.80 Submitters made a number of comments on Section 7.3.1, ‘Tracks and trails’. A number of these were critical of current practice.
- 2.81 One submitter said that he was a frequent user of reserves in the CNP, and that over the past 20 years there had been ‘a very significant increase’ in walkers, runners and cyclists using reserves close to residential areas. In spite of this there had been ‘virtually no maintenance of existing trails or construction of new trails’ and many existing paths were ‘badly eroded’ and ‘subject to increasing use by walkers and now by mountain bikes’. This included the Centenary Trail which, it said, received ‘virtually no maintenance’, and in some parts was ‘so severely eroded that it [was] unsafe to ride on’.<sup>95</sup>
- 2.82 The submission went on to consider proposals in the 2019 Draft Plan to rationalise trails. It said, in light of the apparent lack of maintenance for trails in the CNP, that it was surprising that the 2019 Draft Plan made ‘no effort to indicate how the very popular uses of walking and running [would] be better managed in the future’, or considered further investment in ‘significant upgrading and maintenance of ... trails and tracks’. It was also impossible to know which walking tracks were considered ‘informal’ and which were walking or multi-use tracks, and this was an important omission: if specific informal tracks didn’t meet specifications, but were heavily used, then it didn’t make sense just to close them without making alternate tracks available. In light of this, if there were moves to rationalise trails, the custodian must ensure that local communities were consulted effectively.<sup>96</sup>
- 2.83 The submission said that the need for a better approach was illustrated at Black Mountain, where the key action to ‘rationalise tracks and monitor increased recreation’ was ‘woefully inadequate’ as a way to support nature-based recreation. In light of its central location and size there was ‘huge potential to create an iconic multi-use circuit trail’ on its lower slopes, with connections to Aranda Woodlands. At present, however, these were ignored in the stated objectives for this part of the CNP.<sup>97</sup>
- 2.84 Another submission took a slightly different view, saying that cycling off track had become ‘a serious risk for conservation’, and that even though this had been confirmed by government-funded research, it continued to be a significant problem at Black Mountain and other parts of the CNP.<sup>98</sup>

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<sup>95</sup> Submission No 78, p. [1].

<sup>96</sup> Submission No 78, p. [2].

<sup>97</sup> Submission No 78, p. [3].

<sup>98</sup> Submission No 85, p.1.

- 2.85 There was similar comment focused on Mt Taylor where, said another submission, there were 27 entrances to the reserve, resulting in 'desire lines'; poor maintenance led to the widening of eroding trails 'so people [could] walk safely'; and the creation of unauthorised walking and mountain bike trails. While the submission supported the visitor experience framework referred to in Action 48 of the 2019 Draft Plan, and a review of trails, this could only be effective with adequate resourcing.<sup>99</sup>

### 'BOOKED GROUP EVENTS'

- 2.86 Submitters expressed concern about the 2019 Draft Plan's Section 7.5, 'Booked group events'. One submission noted that Action 62 was 'to explore opportunities for holding appropriate community "events" in Canberra Nature Park', which it regarded as 'vague' for an action with 'potential for significant adverse impact'. It expressed concern that an organiser of a booked group event was only obliged to consult with the custodian if numbers exceeded 100, and this failed to recognise that even events on a smaller scale could have a negative effect 'if undertaken in the wrong place, at the wrong time/season, or for some by their very nature'.<sup>100</sup> It also expressed concern about the fate of sanctuary areas, such as that at Mulligans Flat and Gorooyarroo which, it said, was not 'just another landscape' for recreational use. Higher impact activities and organised sporting events were 'incompatible' with the Sanctuary's purpose and conservation status; should not be permitted in the Sanctuary area; and this should be clearly stated in the Plan.<sup>101</sup>
- 2.87 Another submission also expressed concern about proposals for holding community events in the CNP. It said that there were 'plenty' of urban open spaces more suitable for community events, which could be used for 'most activities'. Park care groups had long been calling for an Outdoor Recreation Strategy 'to resolve the best locations for recreational activities in the ACT and minimise impacts on CNP'. Such a plan, it said, should 'capture the full spectrum of places (parks, reserves, green strips) and suitable activities - passive recreation like walking, jogging, cycling, dog recreation, and active recreation like cycling and mountain biking', and facilitate the planning for and provision of spaces for these activities, outside of the CNP, 'within existing and future suburbs, dog walking areas and dog parks'.<sup>102</sup>

### 'DOG WALKING'

- 2.88 One submission expressed significant concern regarding matters touched upon in Section 7.4.3 of the 2019 Draft Plan, 'Dog walking', and Table 7.1. It said that the 2019 Draft Plan should

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<sup>99</sup> Submission No 92, p.2.

<sup>100</sup> Submission No 29, p. [4].

<sup>101</sup> Submission No 29, p. [5].

<sup>102</sup> Submission No 92, p.2.

provide that dogs, where permitted, 'be restricted to identified trails', as the effects of dogs on wildlife were 'proven' and were 'much more significant than those of horse-riding and bicycling'. Walking away from tracks into the bush 'greatly' increased the opportunity for some dog-owners to release their dogs undetected, and for those dogs to harass wildlife. The submission said that although they only involved a minority of users, the frequency of complaints showed that this was a significant problem in the CNP.<sup>103</sup>

- 2.89 The submission referenced research showing that there were significant effects from walking leashed dogs on avian diversity and abundance in Australian reserves, and suggested that this amounted to a 'sound rationale' under the *Nature Conservation Act* for limiting the extent of dog access in reserves, which would 'also limit the extent of associated impacts on wildlife'. Since, it argued, 'only a relative minority of dog-walkers [wished] to walk off-track', the benefit would be 'significant' but the inconvenience 'minimal'.<sup>104</sup>

## BROADER CONCERNS

- 2.90 Broader comments about nature-based experiences included statements of concern about the burden of greater use on the CNP. One submission said that 'too much [was] being expected of the CNP in terms of accommodating recreational activities and community events'. Reserves in the CNP were being 'degraded', particularly by 'people creating unauthorised trails' and by mountain bikers, 'a cohort of whom do not stay on the formed trails', especially in southern Canberra at Woden and Tuggeranong where there were 'no designed trail networks for mountain bikes', except for a small part of Isaacs Ridge.<sup>105</sup>
- 2.91 Another said that CNP reserves were in danger of over-use. With increasing population, there was heightened demand for facilities, and more people in Canberra were seeking recreational opportunities in natural areas and green strips. According to this submission, there had been 'noticeable increases' in numbers of people using sensitive woodland reserves such as Mulligan's Flat and Goorooyarroo and Callum Brae. Some reserves in the CNP had been 'very heavily used' for recreation, leading to a lessening of their environmental value. Again, bike use in reserves was indicated as a problem.<sup>106</sup>
- 2.92 The submission expressed concern about some actions indicated in the 2019 Draft Plan which might bring further 'increased impacts' from recreational activities. It indicated the 2019 Draft Plan's Action 62, 'explore opportunities for holding appropriate community events in CNP', and

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<sup>103</sup> Submission No 66, p. [1].

<sup>104</sup> Submission No 66, p. [1], referencing Peter B. Banks and Jessica V. Bryant, 'Four-legged friend or foe? Dog walking displaces native birds from natural areas', *Biology Letters* (2007) 3, 611–613, doi:10.1098/rsbl.2007.0374, published online 4 September 2007.

<sup>105</sup> Submission No 92, p. [1].

<sup>106</sup> Submission No 69, p.2.

the potential for Recreation & Tourism strategies ‘to permit new or expanded recreational infrastructure/activities’ that were potentially at odds with protections for ecological values in the CNP. It also expressed concern at proposals for additional horse-riding in some reserves, which raised questions as to effects on the ground layer and risks associated with weed introduction and management.<sup>107</sup>

- 2.93 As noted above, the submission said that an alternative was to take a more ‘holistic’ approach to the urban and peri-urban landscape in the ACT to ‘reduce pressure on the CNP system’. At present urban design did provide sufficient recreational opportunities in local neighbourhoods, such as local green areas. As a result, residents looked to the CNP as a place for ‘walking, jogging, cycling, dog recreation etc’, and also for more ‘active and damaging recreational’ activities such as cycling, mountain biking and ‘even motorised trail biking’.<sup>108</sup>
- 2.94 The submission suggested that, taking this into account, improved design of suburbs to include areas for community recreation could help to reduce effects on the CNP and improved conservation outcomes. Constructive measures, it said, would be:
- wider buffers around urban areas;
  - better walking paths and trails in new suburbs;
  - ‘functional green corridors’ to support range connectivity for species such as the Superb Parrot;
  - more space for bike use and dog-walking outside of the CNP; and
  - use of unused open spaces, such as unused ovals, for community purposes.<sup>109</sup>

## HORSE-RIDING

- 2.95 A significant thread of comment on nature-based experiences focused on horse-riding. Much of this was sourced from the ACT horse-riding community, and responded to Appendix 5, which was present in the 2019 Draft Plan and had been removed when the 2020 Draft Plan was released. Although the Appendix was removed, this line of comment warrants further attention as they it is relevant to debates over the merits and costs of different activities in the CNP.
- 2.96 One submission said that since the 1990’s horse riding had been ‘singled out’ for its impact on trails and ecology, however the Beavis report of 2000 had ‘raised doubts’ about whether this view was applicable for the Canberra region. It found that many of the studies cited in an earlier influential study by Landsberg (1999) had ‘critical limitations’ because they focused on

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<sup>107</sup> Submission No 69, p.2.

<sup>108</sup> Submission No 69, p.2.

<sup>109</sup> Submission No 69, p.2.

specific sites and their findings could not be generalised. Findings about trail degradation, weed introduction, and overall findings on damage from horse-riding were also questionable due to limitations in research design, methodology and conclusions in the literature. Beavis questioned whether the research could be applied to the CNP, and raised questions about the ability to identify the effects of horses on multi-use tracks 'in the absence of scientific evidence'.<sup>110</sup>

2.97 It said that no researchers had been able to isolate weed dispersal from horses from that of other users, or 'prove that a passing horse distributes any more weeds than any other passing vector'. In fact, the submission said, the effects of horse riding were 'no greater than that of ACT government vehicles, walkers or mountain bikes etc'. On formed tracks the impact was 'negligible', as had been demonstrated in NSW when rangers inspected 'a formed track two days after an endurance event that involved 50-60 horses' and were 'unable to detect any disturbance to the surface of the formed tracks by horses'.<sup>111</sup>

2.98 The submission saw 'no justification' for what it saw as the 2019 Draft Plan's 'discriminatory' comments on horse riding, suggesting that it was to be restricted in order to limit 'damage to vegetation, soil compaction and erosion, introduction of weed species, and accidental transport of pathogens'. The 2019 Draft Plan also presented no research sources demonstrating that horses were 'more likely to carry pathogens than any other vector, or what pathogens this might include'. Other parts of the 2019 Draft Plan referred to damage to the CNP from cycling and mountain-biking, where numbers were 'significantly higher', and participants were known to pursue 'off-trail adventures', yet 'the historical prejudice against horses remains in the draft plan as it currently stands'.<sup>112</sup>

2.99 In contrast, the submission said, other jurisdictions had 'found meaningful ways to enable horse riding in areas previously closed', including NSW where horse riding had been 'increasingly allowed' in national parks and wilderness areas. Based on trials in four NSW national parks, plans of management had been amended to allow horse riding to continue.<sup>113</sup>

2.100 In contrast, the 2019 Draft Plan had 'singled out endurance riding, both training and competing', and sought 'to remove access' for those activities. The submission said that it regarded distinctions made by the Plan between horse-riding and 'mountain bike riders, walkers and other users' as tending to 'discriminate and ultimately eliminate our sport entirely from Canberra'.<sup>114</sup>

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<sup>110</sup> Submission No 71, p.4.

<sup>111</sup> Submission No 71, p.4.

<sup>112</sup> Submission No 71, p.4.

<sup>113</sup> Submission No 71, p.4.

<sup>114</sup> Submission No 71, p.5.



2.101 A further submission also advocated on behalf of horse riders. In considering the impact of horses on ecological values in the CNP, it said that it was possible, ‘under certain circumstances’, for horses to have an effect on the CNP, but believed that there was ‘no activity that anyone can undertake in the environment which [had] no impact’, including ‘traditional activities like bushwalking’. One source, it said, suggested that 73% of visitors to Australian national parks carried seeds on their clothing, ‘acting as vectors for ...dispersal’, along with their ‘vehicles, bicycles, horses and dogs’. Research estimated more than 1.9 million seeds were inadvertently carried by walkers into national parks each year. Labelling ‘the far fewer horses’ in national parks as ‘prime culprits in the degradation of the environment’ was both ‘irrational’ and ‘extremely distressing to the equestrian community’.<sup>115</sup>

## ‘COMMUNITY INVOLVEMENT’

2.102 In making comment on Chapter 8, ‘Community involvement’, one submission noted the effect of poor resourcing on the CNP custodian. The submission said that previously there had been Ranger-led walks in CNP reserves but in ‘recent decades’ District Rangers’ workloads were such that there was no capacity for community liaison and education. Support for school and community service activities had been left to the Park Care Ranger.<sup>116</sup>

2.103 It said that an ‘absence of an organisational focus’ had led to there being ‘no specific CNP education programs for schools and everyday users’, except for events run by Park Care groups and the Woodlands and Wetlands Trust. Relevant policy objectives and actions outlined in Section 8.5 of the 2019 Draft Plan would require ‘substantial investment’ in new staff, capability and programs. The ‘in-house’ approach adopted in the 2019 Draft Plan ignored the ‘capability and experience’ already existing in Catchment groups to deliver this education ‘in partnership’.<sup>117</sup>

2.104 The submission said that the employment of a dedicated Park Care Ranger in late 2013 had been ‘a huge step forward’ for the ParkCare program in providing practical support, but that the role was ‘challenging’ for one ranger, ‘given the number of Park Care groups and the breadth of land management tasks’. This one position could not do ‘all the heavy lifting around volunteers within the Agency’. A close working relationship with District Rangers was ‘equally important’ for volunteers and created a sense that volunteering was ‘supported across the organisation’.<sup>118</sup>

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<sup>115</sup> Submission No 97, p. [2].

<sup>116</sup> Submission No 92, p.3.

<sup>117</sup> Submission No 92, p.3.

<sup>118</sup> Submission No 92, p.3.

## ‘RESEARCH AND MONITORING’

- 2.105 In making comment on Chapter 9, ‘Research and monitoring’, submissions spoke about: the importance of an evidence-based framework; developing targets against which success could be measured; specific funding for research and monitoring; and edge effects. One submission said that the 2019 Draft Plan contained ‘sound principles’ for research and monitoring. It approved of the 2019 Draft Plan referring to ‘an evidence-based framework to underpin management decisions’, and expressed support for the ‘policies, objectives and actions’ summarised in Section 9.4.<sup>119</sup>
- 2.106 Another suggested that it would be useful if the Conservation Effectiveness Management Plan could be used to develop high level targets against which the success of the 2019 Draft Plan could be measured.<sup>120</sup> Two other submissions suggested that there should specific and continuing budget allocations for biodiversity monitoring and reporting.<sup>121</sup>
- 2.107 A further submission said that Chapter 9 should acknowledge that the CNP sat ‘within an urban matrix’ and that threats outside park boundaries, particularly weeds, should be ‘actively managed’. There needed to be ‘a cohesive management regime’ in the ACT involving collaboration between ‘research ecologists, open space and CNP land managers’ to ‘monitor and maintain biodiversity across the urban landscape, including in ‘new constructed interventions’ such as wetlands, outside of nature reserves, which complemented the CNP and provided habitat for native species.<sup>122</sup>
- 2.108 It expressed concern that within the CNP, the research and monitoring effort was ‘not equitably distributed’. An example was that there was ‘no active habitat management’ for the Pink-tailed worm lizard on Mt Taylor, aside from volunteer work and ‘ad-hoc weed control’. Older CNP reserves did not attract the same ‘investment in research, habitat restoration and monitoring’ seen in nature reserves close to newer developments such as Gungahlin and the Molonglo Valley.<sup>123</sup>

## ‘PLANNING, APPROVALS AND COMPLIANCE’

- 2.109 Submissions making comment on Chapter 10, ‘Planning, Approvals and Compliance’ spoke about the effectiveness of compliance effort, the need to fund compliance activities

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<sup>119</sup> Submission No 69, p.3.

<sup>120</sup> Submission No 94, p.11.

<sup>121</sup> Submission No 94, p.11, Submission No 100, p.5.

<sup>122</sup> Submission No 92, p.3.

<sup>123</sup> Submission No 92, p.3.

effectively, and—very commonly—about dog walking and compliance. One submission said that public activity contrary to management plan objectives was routine in the CNP. There appeared to be insufficient understanding, ‘even amongst regular park goers’, as to the damage that could be done by such things as walking dogs off-lead and leaving dog faeces; going off-trail; and leaving or dumping rubbish. All of these were common practice.<sup>124</sup>

2.110 Another submission said that compliance was ‘critical’ and needed to be ‘properly resourced’. Such damage as occurred in CNP reserves such as Mt. Taylor was made worse by the absence of an ‘active management presence’. The 2019 Draft Plan’s chapter on compliance could be strengthened by referencing the Code of Practice developed for Actew (Icon water) and its contractors when working in the CNP.<sup>125</sup>

2.111 A further submission agreed that compliance was ‘an integral part’ of any measures to protect the CNP, and if there were no readiness to undertake compliance, then protection for the CNP would fail, as it already was. A lack of effective compliance would also lead to some members of the community being even ‘more ready’ to ignore applicable legislation.<sup>126</sup>

## DOG-WALKING AND COMPLIANCE

2.112 As noted above, submissions made considerable comment about dog-walking and compliance. One submission highlighted what were considered anomalies in the zoning system and permissions for dog-walking. It said that dog walking was a popular activity in the CNP; was permitted in 23 of the 37 CNP reserves; and that it would be useful to align permissions with Zone 1 and Zone 2 Conservation Areas. As it was, they were not aligned: dogs were permitted on in the Mt Ainslie reserve, which was for the most part a Zone 1 Conservation Area except for paths. Clarifying the different activities allowed in Zone 1 and Zone 2 would be useful. Compliance was an issue for dog-walking, and information on potential damage from dogs in the CNP should be made available through various channels.<sup>127</sup>

2.113 Another submission provided a powerful first-hand account of this damage. The submitter wrote that they were ‘saddened’ by the number of dogs off lead encountered ‘almost daily’ on walks on Mount Taylor. Dog owners appeared unaware that dogs off lead had the potential to ‘disturb and even kill’ ground dwelling birds, reptiles and other animals, or that if a dog chased a kangaroos or wallaby but did not injure it, there was still potential for serious harm. The submitter said that they had seen firsthand accidents where kangaroos or wallabies had been

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<sup>124</sup> Submission No 94, p.11.

<sup>125</sup> Submission No 92, p.3.

<sup>126</sup> Submission No 100, p.5.

<sup>127</sup> Submission No 94, p.12.

chased by dogs out of the reserve and onto roads, where they had been hit by cars. The result was not only harm to wildlife but the potential for 'serious harm, or even death', for drivers.<sup>128</sup>

2.114 The submitter had also seen dogs off lead 'actively pursuing wildlife' in on Mount Taylor, Mount Arawang and McQuoid's Hill in previous months, 'often with the owners of the dogs present at the time'. After a recent incident in which two dogs attacked, a kangaroo and joey had been euthanized, and this was not an uncommon event in the CNP. While dog control officers attended in this case, infringements for dogs off-lead were not routinely issued, and it appeared that most people walking dogs off-lead knew that they should be using a lead but that there were 'no real ramifications for not doing so'.<sup>129</sup>

2.115 Management of dog faeces represented a further compliance failure. It was common for people to leave plastic bags containing dog faeces in the reserve, which could be seen 'left beside the track, thrown into bushes and tussocks and even hanging in trees'.<sup>130</sup>

## 'RESERVE COMPLEXES'

2.116 Submitters made comment on Part 2, 'Reserve Complexes'. One submission said that the 2019 Draft Plan did not appear to 'to adequately acknowledge the special values of some reserves', and tended to 'treat CNP reserves uniformly in terms of priorities'.<sup>131</sup> It said that the 2019 Draft Plan should:

ensure that high-quality grassy woodland sites, which comprise a significant part of CNP reserves, have more recognition for their special nature, their sensitivity (to impacts and disturbance, such as from organised events involving large numbers of people), and their need for appropriate and targeted management actions including limits on certain activities.<sup>132</sup>

2.117 This need was highlighted, it said, by instances where events involving large numbers of people had been approved in sensitive woodland reserves such as Callum Brae.<sup>133</sup>

2.118 Sanctuaries in the Mulligans Flat and Goorooyarroo reserves also could be given higher priority for key actions, such as managing species and ecosystems in the Sanctuaries, especially 'to deal with the challenges of overabundant grazing and browsing mammal species', since such actions had not been included in summaries for those reserves. Acknowledging the stated

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<sup>128</sup> Submission No 101, p.1.

<sup>129</sup> Submission No 101, p.1.

<sup>130</sup> Submission No 101, p.2.

<sup>131</sup> Submission No 69, p.3.

<sup>132</sup> Submission No 69, p.3.

<sup>133</sup> Submission No 69, p.3.

intention to develop more detailed plans and strategies for the Sanctuaries and other parts of the CNP, the 2019 Draft Plan, it said, should indicate 'all important management issues', including strategies for the Sanctuaries.<sup>134</sup>

2.119 Another submission also looked for greater detail, saying that while the reserve summary profiles in the 2019 Draft Plan were 'helpful', it looked forward to the release of Operational Plans for all of the reserves within the CNP, as it would be these that would determine activities within each reserve to 'conserve, protect and enhance biodiversity'.<sup>135</sup>

2.120 A further submission said that while it was to some degree useful to group the CNP reserves into seven complexes, it was 'disappointing' that an opportunity to group CNP units into ecosystems that matched key strategies such as Woodland or Grassland Strategies had been missed. There had been problems in the way previous CNP draft management plans had interacted with other key environmental strategies, and this could have been corrected in the 2019 Draft Plan.<sup>136</sup>

## EDGE EFFECTS

2.121 Edge effects have been referenced in other parts of this report. Submissions also made comment about edge effects in relation to reserve complexes. One submission said that all reserves had been identified as IUCN Category IV habitat/ species management areas, and that the table outlining actions linked to IUCN objectives was 'helpful'.<sup>137</sup> It noted that the IUCN objectives were intended as a basis to 'maintain, conserve and restore species and habitats'. These, it said, were objectives which could form the basis for management strategies to be put in place 'on areas outside or adjacent to the CNP'.<sup>138</sup>

2.122 The submission noted that the CNP reserves were 'scattered throughout existing and new urban development areas', and as a result were 'heavily impacted by human activities in and outside the park boundaries', such as weeds, domestic animals, and tree clearing. These edge effects should be addressed in development processes before the start of construction for new urban areas commenced. While strategic assessment in planning provided an opportunity to protect the CNP, in practice urban development was often 'at odds' with conservation objectives.<sup>139</sup>

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<sup>134</sup> Submission No 69, p.3.

<sup>135</sup> Submission No 94, p.2.

<sup>136</sup> Submission No 40, Attachment A, p. [1].

<sup>137</sup> See *Canberra Nature Park Draft Reserve Management Plan 2020*, Appendix 3, p.216.

<sup>138</sup> Submission No 94, p.3.

<sup>139</sup> Submission No 94, pp.3-4.

- 2.123 It emphasised the importance of connectivity across the CNP, and that this included areas for which other parts of government were responsible. An example was City Services, which delivered the urban tree program, and was currently calling for suggestions for locations for new urban trees. Other agencies could also support the objectives of the Plan.<sup>140</sup>

## SPECIFIC RESERVES

- 2.124 Submissions made comment on specific reserves within the CNP complex. Comments on Mount Ainslie and Mount Majura, Red Hill, and Mount Taylor reserves are considered here.
- 2.125 One submission paid special attention to trails. It noted a key action in the Draft Plan for Mount Ainslie and Mount Majura, to manage increasing recreation activity in the reserve ‘through improved signage and enforcement’. This, it said, seemed ‘a very poor approach to both encouraging recreational use and minimising adverse impacts’. A better approach would see the creation of a ‘well located and well-maintained’ network of trails that would cater for expected higher rates of recreational use.<sup>141</sup>
- 2.126 The map for Red Hill reserve on the PCS website also showed only one walking trail, implying that all the other ‘long-standing’ walking trails were all informal, including a section of the Centenary Trail leading from Mugga Way up to Red Hill. It said that in view of the current ‘very high level’ of passive recreation activity in the reserve, consideration should be given to improving the network of multi-use trails, including better support for increasing mountain bike use.<sup>142</sup>
- 2.127 This submission also said that a Core Conservation zone proposed for the Red Hill reserve, extending to Buxton and Dugan Streets, was ‘problematic’. It did not make sense to extend a Core Conservation zone beyond the existing fire trail, as all of this land was ‘highly modified’. Existing trails in this area were heavily used for recreation and were important for fire management—both for conducting prescribed burning and for control of bushfires—and it would be counter-productive to reduce the number of tracks and trails in an area ‘so close to high value urban assets’.<sup>143</sup>
- 2.128 It was also ‘completely unclear’ what was meant by the objective to ‘maintain connectivity to surrounding woodland areas’ for the Red Hill reserve, as there were ‘no surrounding woodland areas’: the only nearby woodland area was Mt Mugga Mugga, and the two reserves were separated by a four-lane road.<sup>144</sup>

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<sup>140</sup> Submission No 94, pp.3-4.

<sup>141</sup> Submission No 78, p. [3].

<sup>142</sup> Submission No 78, pp. [3-4].

<sup>143</sup> Submission No 78, pp. [3-4].

<sup>144</sup> Submission No 78, pp. [3-4].

- 2.129 Another submission, in relation to the Mount Taylor reserve, said that the 2019 Draft Plan recognised, through proposed ‘core conservation’ zoning, that the Mount Taylor reserve provided habitat for the vulnerable Pink-tailed Worm-lizard and supported a ‘source population’ of the Small Purple Pea. In light of this, there should be an action to ‘protect and improve Pink-tailed Worm-lizard habitat’ as well as the current ‘monitor’, and to maintain ‘groundcover and connecting high quality habitat’.<sup>145</sup>
- 2.130 Other actions were also needed. The submission said that kangaroo grazing was having ‘adverse impacts’ on both of these species, and that the reserve should be included in the ACT Kangaroo Management Plan. Groundcover degradation from grazing and browsing species was beyond the scope of the local park care group, as the kangaroo population numbered 600 or more at last count and there had been no rabbit control in the recent past. Kangaroos were also increasing safety risk on suburban roads around Mt Taylor.<sup>146</sup>
- 2.131 There was ‘significant deterioration’ of tracks in the reserve and the submission called for a specific action ‘to upgrade and maintain the walking track network’ to respond to high rates of recreational use.<sup>147</sup>
- 2.132 The submission expressed strong concern at a proposal in the 2019 Draft Plan to ‘explore opportunities for increased horse riding access’ on Mount Taylor, which already had an equestrian trail along its ‘entire perimeter’. In view of habitat values and current heavy use by walkers, providing additional horse trails was ‘totally at odds’ with policies set out in Section 7.4.5 of the 2019 Draft Plan, which were protocols for trail design. It said that previous work with the CNP custodian had found that new horse trails were not feasible; were likely to create user conflicts; were likely to have adverse effects on the ground layer and plants; and had the potential to introduce weeds in important pink-tailed worm lizard habitat areas.<sup>148</sup>

## IMPLEMENTATION

- 2.133 Submissions also made comment on aspects of implementation for the 2019 Draft Plan. This included comment on funding and resources; articulations and linkages in- and out-side of the 2019 Draft Plan; the balance between imperatives; the past, present and future of the CNP; and further comment on edge effects.

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<sup>145</sup> Submission No 92, p.3.

<sup>146</sup> Submission No 92, p.3.

<sup>147</sup> Submission No 92, p.4.

<sup>148</sup> Submission No 92, p.4.

## FUNDING AND RESOURCES

2.134 A number of submissions voiced concern on whether sufficient resources would be applied so that the actions set out in the 2019 Draft Plan could be implemented. One submission said that the need to fund the 2019 Draft Plan adequately was highlighted by the fact that some of the projects included in the present Draft Plan had been proposed ‘for many years’ but had not been achieved for want of funding. Drought and climate change would make the need for funding even more urgent.<sup>149</sup>

2.135 Another said that while the 2019 Draft Plan indicated activities that were needed to protect the CNP, implementation would require adequate funding over the long-term, and insufficient funding was ‘one of the key threats to the Draft Plan’s implementation’. Low funding-levels had contributed to the ‘significant delay’ in the review of the current CNP management plan, and it was ‘imperative’ that new funding models be ‘identified and implemented’ for the protection of the environment in the ACT.<sup>150</sup>

2.136 Other submissions agreed. They said that:

- providing ‘sufficient resources’, including ‘staff, operational and capital funding’ was critical to ensuring that the Plan could achieve its ‘conservation goals and objectives’ and goals to ‘encourage visitors and minimise impacts’;<sup>151</sup>
- the ‘strategies, including support and personnel investment needed for Compliance Management [were] not clearly laid out and [needed] to be explicitly and with detail included in The Plan’;<sup>152</sup>
- ‘general funding for the management of the Canberra Nature Park [remained] inadequate for the work that [needed] to be undertaken’;<sup>153</sup>
- it was ‘essential that appropriate levels of budget funding [were] maintained to cover the management of [the] CNP’;<sup>154</sup>
- to ‘achieve the desired outcomes in CNP, the ACT [needed] to increase the annual investment in CNP for nature conservation, restoration/rehabilitation, management and public education’;<sup>155</sup> and that

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<sup>149</sup> Submission No 39, p.2.

<sup>150</sup> Submission No 40, p. [1].

<sup>151</sup> Submission No 92, p. [1].

<sup>152</sup> Submission No 98, p. [1].

<sup>153</sup> Submission No 94, p.3.

<sup>154</sup> Submission No 100, p.2.

<sup>155</sup> Submission No 100, p.2.



- the ACT should provide resources to ‘enforce compliance and [actively] educate or consider the ban of certain activities’ and to ‘maintain infrastructure in particular tracks that should reflect the high usage of Zone 1 core conservation sites’.<sup>156</sup>

2.137 One submission said that the 2019 Draft Plan provided ‘limited to no information on funding’; that it was ‘essential that there [was] adequate funding available to ensure that [its objectives were] realized’. The 2019 Draft Plan should ‘outline a current budget, anticipated funding, rough estimates of how this will be divided, and the likelihood of the nature of this funding continuing into the future’.<sup>157</sup>

2.138 Another argued that there was little point in encouraging additional visitation if walking trail infrastructure was not maintained. To do this, and meet other resource requirements, each nature reserve in the CNP needed to be ‘managed as an asset in its own right with an annual operational plan and an operations and infrastructure budget to maintain the conservation values’. Such plans should ‘focus on the basics (like trails) to provide safe visitor experiences’. Without them, there was ‘no way of identifying the resources needed to maintain the conservation values of each CNP unit and the entire Park’.<sup>158</sup>

2.139 A further submission said that an imbalance between resources applied to off-set projects, and those for managing existing reserves was a ‘huge challenge’. In practice, more motivated rangers were assigned to off-set projects, because that was where ‘they [could] actually do on-ground conservation work’. Ironically, in this way off-set projects led to a further loss of resources from the CNP, and strategies needed to be devised to reverse this effect.<sup>159</sup>

## LINKAGES AND ARTICULATIONS

2.140 A number of submitters believed that the 2019 Draft Plan could be improved by creating better linkages: both within the Plan, and between the Plan and other points of reference, including legislation.

### INTERNAL LINKAGES

2.141 One submission said that 2019 Draft Plan provided an overarching summary of legislative frameworks and the key issues, outlined management goals and key outcomes, as well as identifying a range of objectives and actions in each chapter, which were prioritise ‘across the life of the plan’ in Appendix 1. But, it said, the 2019 Draft Plan would be a more usable

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<sup>156</sup> Submission No 98, p. [4].

<sup>157</sup> Submission No 96, p. [5].

<sup>158</sup> Submission No 92, p. [1].

<sup>159</sup> Submission No 98, p. [1].

document if objectives, actions and priorities were collected in one place, and objectives were linked back to the goals identified in the Plan.<sup>160</sup>

2.142 Other submissions said that the 2019 Draft Plan should make more explicit linkages between the legislative and policy framework it outlined and the 'generalised actions' listed for each reserve plan.<sup>161</sup> One that it was problematic that no priorities were indicated for the key actions listed for each reserve in Part 2, 'CNP Reserve Complexes and Summary Profiles'.<sup>162</sup> Another said that there was a need to distinguish between management for the CNP as a whole and that for special-purpose areas such as the Sanctuary at Mulligans Flat, particularly regarding visitor management.<sup>163</sup>

2.143 Looking at the 2019 Draft Plan more broadly, a further submission said that the goals set out in the Plan needed to be 'specific, measurable, attainable, relevant and time-based', and that without 'clarity of overarching goals, objectives, actions', it was difficult to 'monitor and evaluate what is being achieved through the plan'. The main concern was that there was 'an abundance of objectives but no clear plan to address them'.<sup>164</sup> Overall, the Draft Plan's objectives, policies and actions required further clarification, 'particularly with respect to interlinkages', so as to establish 'firm, clear, measurable targets and outcomes'.<sup>165</sup>

## EXTERNAL LINKAGES

2.144 Regarding external linkages, one submission noted that the Reserve Management Plan was to be 'a statutory, overarching document focused on principles and policy', and was 'summary in nature'. While its principles seemed 'appropriate and sound', there was a need for more detailed operational or strategic plans, including those for reserves with significant ecological values and more sensitive areas, such as grassy woodlands.<sup>166</sup>

2.145 Another said that the 2019 Draft Plan needed improvement in the way it integrated with other government strategies, such as the Strategic Bushfire Management Plan and the Healthy Living/Active Canberra strategy. While bushfire management was partially covered, the 2019 Draft Plan was 'largely silent' about activities relevant to the Active Canberra strategy, for example. It seemed out of place that while earlier chapters preceded and thus appeared to

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<sup>160</sup> Submission No 94, p.2.

<sup>161</sup> Submission No 29, p. [1], Submission No 84, p.1.

<sup>162</sup> Submission No 40, Attachment A, p. [3].

<sup>163</sup> Submission No 84, p.1.

<sup>164</sup> Submission No 96, pp. [2-3].

<sup>165</sup> Submission No 96, p. [2].

<sup>166</sup> Submission No 69, p. [1].

feed-in to the 2019 Draft Plan's chapter on zoning, the chapter on nature-based experiences was placed after that chapter, so that this element appeared not to be taken into account.<sup>167</sup>

## BALANCE BETWEEN IMPERATIVES

2.146 A number of submissions considered whether a constructive balance had been struck between conservation or recreation objectives for the CNP. One said that in large part reserves in the CNP system had been created protect environmental values, but noted that the reserves were also heavily used by Canberra residents for recreation. It expressed some concern about whether the Plan would 'balance the proper protection of environmental values in reserves, versus recreation', because the Plan appeared to give further encouragement to recreational use. Management of the CNP should prioritise the environmental values which the reserves were created to protect.<sup>168</sup>

2.147 Another agreed, saying that despite the clear primary objective of CNP as environmental conservation, the 'the general thrust of the 2019 Plan' had 'shifted towards recreation' which appeared to be placed 'on the same level as the conservation of the natural environment'. 'Often reiterated' statements in the 2019 Draft Plan suggesting the need to balance nature conservation and recreation did not take into account the primary managing objective of nature reserves, and it was not clear who would decide when recreational activities got to the point where they were inconsistent with the protection of the natural environment, or what data would be used to inform decisions. An example was that the custodian supported construction of cubby houses in the CNP nature reserve as part of Nature Play, but this appeared quite clearly at odds to the primary objective.<sup>169</sup>

## PAST, PRESENT AND FUTURE

2.148 A number of submissions considered the past, present and future of the CNP. One criticised the 2019 Draft Plan for being 'generally based on the past' and not attending sufficiently to the 'actual reality of today'. Future plans would be 'dictated' by climate change and populations and use by animals and humans, and future outcomes would depend on how the ACT responded to these changes, both private citizens and government. They would also have profound resource implications. Already volunteer groups were encountering these changes, and needed more leadership. Mount Taylor was an example in practice, where lack of fodder and water was driving native animals out of the reserve, and increasing pressures from recreational use were evident, including significant erosion of trails. While the 2019 Draft Plan should deal with the onset of climate change now, decisions to close some reserves was an

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<sup>167</sup> Submission No 78, p. [1].

<sup>168</sup> Submission No 69, p. [1.]

<sup>169</sup> Submission No 98, p. [1].

encouraging sign that present management was in some way responsive to these challenges.<sup>170</sup>

2.149 Another agreed, saying that while it was an improvement on the previous Plan, the 2019 document—intended to set out a ten-year plan—for the most part described current practice rather than what might be achieved within the next ten years.<sup>171</sup>

2.150 A further submission said that the Draft Plan had not taken sufficient account of previous findings and recommendations. In a 2011 report on the CNP, the ACT Commissioner for Sustainability and the Environment had made a number of high priority recommendations, including:

- ‘Developing and implementing a community education and awareness program’;
- ‘Priority [to be] given to identified routine management actions for each reserve which should be part of the Nature Reserve Operational Plans’;
- ‘Implementing a nature reserve restoration program which would be additional to routine management’;
- ‘Preparing a Nature Reserve Operational Plan (NROP) for each nature reserve which (among other things) should be prepared in collaboration with stakeholders especially ParkCarers’; and
- ‘Developing and implementing a nature reserve monitoring strategy’.<sup>172</sup>

2.151 For the most part, it said, these had not been—or had not been fully—implemented. There were good reasons why they should be, and the failure of the 2019 Draft Plan to include or respond to these recommendations was significant.<sup>173</sup>

2.152 Another submission said that while the 2019 Draft Plan set out a ‘comprehensive list’ of actions for the next ten years, it was unclear what success ‘would look like’ for protecting the ACT’s critically endangered Natural Temperate Grassland, Yellow-Box-Red Gum Grassy Woodland, and threatened plant, bird and fauna species.<sup>174</sup>

2.153 It noted that ecological evaluations had, and would, be collected under the Conservation Effectiveness Management Program (CEMP) and that this could provide baseline data for ‘ecological targets for the next ten years’ to be established.<sup>175</sup>

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<sup>170</sup> Submission No 95, p.1.

<sup>171</sup> Submission No 79, p. [1].

<sup>172</sup> Submission No 98, p. [4].

<sup>173</sup> Submission No 98, p. [4].

<sup>174</sup> Submission No 94, p.1.

<sup>175</sup> Submission No 94, p.2.

2.154 A further submission agreed. It said that the 2019 Draft Plan needed ‘biodiversity benchmarks or targets’ which contained ‘a baseline of existing threatened fauna and flora’ and provided for their status to be monitored periodically. However, it said, without specific targets ‘to improve habitat for species’ and ‘clear actions to meet those targets’, threatened species would ‘continue to be impacted’ and their numbers would ‘continue to decline’.<sup>176</sup>

## EDGE EFFECTS

2.155 As noted elsewhere, when it came to considering the implementation of the 2019 Draft Plan, submitters drew attention to the importance of edge effects. This was considered a significant element in managing the CNP due to its distinctive positioning amongst developed urban areas.

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<sup>176</sup> Submission No 96, p. [3].

### 3 THE RESPONSE TO SUBMITTERS' CONCERNS

#### SUMMARY OF SUBMITTERS' VIEWS AND CONCERNS

- 3.1 This chapter consists of two tables. Table 1 is a summary of concerns put forward by submitters to the 2019 Draft Plan consultation process. Table 2 presents information provided in the Consultation Report about how the Directorate considers that it responded to the submissions.
- 3.2 Using these tables together, it is possible for the reader to identify concerns raised by submitters and see to what extent—and how—they were dealt with in the Consultation Report. This provides an evidential basis for the Committee's reflections of the 2020 Draft Plan, including its reflections on what was or was not responded to in the 2019 Draft Plan process, presented in Chapter 4.
- 3.3 For further detail, please see Appendix B, which describes textual changes between the 2019 and 2020 draft plans.

Table 1: Summary of submitters' views and concerns

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
	Introduction	
1	the 2019 Draft Plan did not properly reflect the priority accorded nature conservation as the foremost principle managing for the CNP, as provided for in the <i>Planning and Development Act 2007</i> at Item 3 of Schedule 3, and Section 315(4); <sup>177</sup>	Table 2, Item 4 & see CNP Draft Plan 2020, pp. 6, 11, & 14.
2	there was a perceived absence in the Plan of a logic, criteria or rationale for why land was or was included in the CNP; <sup>178</sup>	No direct response, although see Table 2, Items 1, 2 & 3

<sup>177</sup> Submission No 40, p. [1]; Submission No 87, p. [1]; Submission No 98, p. [1]; Submission No 94, pp.1,2.

<sup>178</sup> Submission No 29, p. [1] and Submission No 96, pp. [1-2].

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
3	the Plan employed a 'uniform and generalised management approach' across the CNP and without providing 'detail on management actions for specific values and ... reserves'; <sup>179</sup>	Table 2, Item 73
4	the intent or purpose of the Plan remained unclear; <sup>180</sup>	No direct response, although see CNP Draft Plan 2020, p.9.
5	the Plan would not support community understanding or acknowledgement of the value of the CNP; <sup>181</sup>	No direct response, but increased emphasis on recreation seems to work against this view, and see CNP Draft Plan 2020, p.106.
6	the review cycle for Reserve Management Plans for the CNP should be conducted every 10 years, as stated in the 1999 Plan, or more frequently, given the observable effects of climate change and ecological threats; <sup>182</sup>	No response evident in Tables 2 or 3 below
	Chapter 2, 'Plants and animals'	
7	connectivity between the component reserves of the CNP was important for its resilience and that of native plant and animal species, and that the Plan could do more to support this imperative; <sup>183</sup>	Table 2, Item 11 and see CNP Draft Plan 2020, pp. 33-35, 238.

<sup>179</sup> Submission No 29, p. [1].

<sup>180</sup> Submission No 23, p.1.

<sup>181</sup> Submission No 23, p.2.

<sup>182</sup> Submission No 98, p. [1] and Submission No 96, p. [1].

<sup>183</sup> Submission No 100, p.3 and Submission No 94, p.4.

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
8	the make-up of the CNP as a system of separate reserves brought particular challenges in managing fire risk, particularly in view of climate change, and that this a scientific basis for fire management was needed if preserving life and property was to be done in a way consistent with ecological imperatives; <sup>184</sup>	No response to fire risk and the CNP's 'system of separate reserves'; for 'scientific basis' see Table 2, Item 19 and Table 3, Items 29, 86 and Draft Plan 2020 p.110.
9	invasive plant and animal species were a significant threat to biodiversity, required 'ongoing investment', particularly in view of climate change, and should attract a higher priority in the Plan; <sup>185</sup>	Table 2, Item 23
10	active research into weed management was 'critical' for the CNP, to control such introduced species as African Lovegrass; <sup>186</sup>	Table 2, Item 23, but no reference to weed research in Draft Plan 2020, p.51.
11	plants considered 'weed pests' under legislation had not been controlled in CNP reserves, had spread 'exponentially' and, in combination with other evidence over time, this suggested that proper management of the CNP had not attracted sufficient focus or resources; <sup>187</sup>	Objective and Actions for this at Draft Plan 2020, p.51 and see pp.42-43.

<sup>184</sup> Submission No 78, p. [1] and Submission No 94, p.4.

<sup>185</sup> Submission No 94, pp.4, 5; Submission No 100, p.3; and Submission No 94, p.4.

<sup>186</sup> Submission No 92, p.2.

<sup>187</sup> Submission No 2, p. [1].



<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
12	references to 'wild dogs' in the Draft Plan did not take into account that these were predominantly dingoes and that the Plan's approach to managing these animals was not appropriate in view of the CNP's conservation imperative; <sup>188</sup>	Table 3, Item 32; Draft Plan 2020, p.44
	Chapter 3, 'Land and water'	
13	welcomed increased reference to the value of geological features in the CNP; <sup>189</sup>	Table 2, Item 27; Table 3, Items 9 & 41, Draft Plan 2020, p.57.
	Chapter 4, 'Aboriginal connection to country'	
14	supportive of a stronger focus emphasis on working with Traditional Owners and pursuing cooperative arrangements for management of the CNP; <sup>190</sup>	Table 2, Items 5, 28 & 29 and see Table 3, Items 44 & 45; Draft Plan 2020, p.62 ff.
15	critical of a lack of specific language, a lack of actions to support the objective, and the lack of clear, measurable goals; <sup>191</sup>	See Draft Plan 2020, p.69.  'Measurable goals' not evident.
16	critical of failure to conserve, appropriately, First Nations sites that are not heritage-registered, creating a risk of loss or damage of these sites that was inconsistent with stated objectives; <sup>192</sup>	No apparent response – see Draft Plan 2020, p.63.

<sup>188</sup> Submission No 66, p. [1].

<sup>189</sup> Submission No 23, p.1.

<sup>190</sup> Submission No 96, p. [5].

<sup>191</sup> Submission No 96, p. [5].

<sup>192</sup> Submission No 96, p. [5] and Submission No 29, pp. [2,3].

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
	Chapter 5, 'Historic (non-Aboriginal) heritage'	
17	the Plan should have an objective to manage all 'heritage places and objects', not only those identified as 'significant' on the Heritage Register, as relying too heavily on Register entries would put at risk 'any place that [had] not been identified, assessed or listed', in that it implied a lack of value for that place; <sup>193</sup>	Table 2, Item 31. Unclear whether Draft Plan 2020, p.76, responds to this.
	Chapter 6, 'Zoning and access'	
18	some support for the proposed two-zone system as it identified areas of high conservation value and showed which activities were permitted or not permitted; <sup>194</sup>	Table 2, Item 32. Draft Plan 2020, pp.78-80.
19	some support for a greater emphasis on recreation activities, saying that as long as they were consistent with its main focus or purpose they would foster an increasing awareness, on the part of the community, of the value of the CNP, and compliance, and particularly better signage, would play an important part in protecting the CNP against the risk of damage from these activities; <sup>195</sup>	Draft Plan 2020, p.84 <i>ff</i> ; Table 2, Items 43, 45, 49, 72 & 74; Table 3, Items 99 & 100.
20	concern that the Draft Plan provided no explanation or rationale for the change from the four-zone framework of the 1999 Reserve Management Plan to the two-zone approach proposed in the current Plan, nor a description of the benefits anticipated from this change; <sup>196</sup>	No apparent response

<sup>193</sup> Submission No 29, pp. [2,3].

<sup>194</sup> Submission No 40, p. [2].

<sup>195</sup> Submission No 100, p.4.

<sup>196</sup> Submission No 96, p. [4].

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
21	concern that the classification of activities permitted or not permitted in the zones was vague and used 'conditional language', which might imply that that 'there might be a reason for reasonably allowing the activity to occur under some circumstances', and that clearer language should be used across the board for activities permitted or not permitted; <sup>197</sup>	Not reflected in consultation report or Draft Plan 2020, pp.80-81.
22	concern at the use of the word 'robust' to characterise Zone 2 areas in the CNP, in effect suggesting that they were more 'resilient' rather than taking into account that in general these areas were placed in Zone 2 because they had been disturbed and damaged; <sup>198</sup>	Table 3, Item 50. Draft Plan 2020, p.78.
23	the zones, as designated, would present challenges and difficulties for fire management in the CNP, and should be amended to ameliorate these unintended effects; <sup>199</sup>	Table 2, Item 33
24	differences between Zone 1 and Zone 2 regarding construction and reserve infrastructure were 'practically non-existent or very weak'; <sup>200</sup>	Draft Plan 2020, pp.80-81.
25	It was difficult to see how improvements could be sought for Zone 2 areas as, if 'potential damaging human activity' were to be concentrated in Zone 2 areas, improvements 'may be difficult to achieve' due to 'the continuation of ... damaging impact'; <sup>201</sup>	Draft Plan 2020, p.80.
26	given limited resources, land managers were more likely under this regime to prioritise conservation work in Zone 1 areas, to the detriment of those in Zone 2; <sup>202</sup>	No apparent response

<sup>197</sup> Submission No 94, p.6, and see table pp.6-8; Submission No 100, p.4; and Submission No 96, p. [4].

<sup>198</sup> Submission No 98, p. [3].

<sup>199</sup> Submission No 78, p. [3].

<sup>200</sup> Submission No 98, p. [3].

<sup>201</sup> Submission No 98, p. [3].

<sup>202</sup> Submission No 98, p. [3].

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
27	high voltage power lines, water reservoirs and pipes, gas pipes, and communications cables and towers, were already situated in the Mounts Majura and Ainslie nature reserves which were 'entirely' Zone 1 conservation areas, and that a code of conduct should be put in place to manage risk to ecological value in such areas; <sup>203</sup>	See Draft Plan 2020, pp.81 and 122-123.
28	there were no Activity Declarations in force for some reserves, leaving them 'largely unprotected'; <sup>204</sup>	No apparent response
29	the Plan 'should recommend that any adjoining or nearby unreserved areas managed by PCS for conservation be reserved and managed as part of [the] CNP'; <sup>205</sup>	No apparent response
30	some areas which had been designated Zone 1 saw 'some of the most intense usage' of any reserves in the CNP, creating contradictions and potential confusion about the zoning framework; <sup>206</sup>	No apparent response
31	compliance was not promulgated or enforced sufficiently to protect the CNP from damage from rising rates of use, with particular failures to ensure compliance on dog walking or mountain biking off-trail; <sup>207</sup>	Table 2, Items 43, 45, 49, 72 & 74.
	Chapter 7, 'Nature-based experiences'	
32	recreational use would contribute to increasing community awareness about the CNP, leading turn to it being managed in a way that protected conservation and biodiversity, so long as these activities were not pursued in ways detrimental to its conservation value; <sup>208</sup>	Draft Plan 2020, Chapter 7, p.84 ff.

<sup>203</sup> Submission No 98, p. [3].

<sup>204</sup> Submission No 66, p. [2].

<sup>205</sup> Submission No 66, p. [1].

<sup>206</sup> Submission No 98, p. [3].

<sup>207</sup> Submission No 98, pp. [3-4].

<sup>208</sup> Submission No 94, pp.8-9.

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
33	the announcement of a recreation and tourism strategy in development was welcome, that such a strategy must prioritise nature conservation as the primary management objective for ACT national park and nature reserves; and address recreation and nature-based tourism not only in conservation reserves, but ‘across the whole of the ACT’; <sup>209</sup>	Table 2, Item 34. Draft Plan 2020, pp.80, 81 & 85.
34	a recreation and tourism strategy should take into account the full spectrum of recreational activities and ensure that spaces were made available outside the reserve system in order to reduce pressure on the CNP; <sup>210</sup>	Indirect response: Table 2, Item 34. Draft Plan 2020, pp.80, 81 & 85.
35	critical of trail management in the CNP: despite a marked increase in use, there had been little maintenance of existing trails which, including the Centenary Trail, were often neglected and were eroding under heavy use, in some cases to the point of being unsafe, and that there was no construction of new trails in the reserve system; <sup>211</sup>	Indirect response: Table 2, Item 36 and see Draft Plan 2020, pp.87-88.
36	plans to rationalise trails in the CNP were called into question by an absence of a cohesive management plan, and the possibility that informal trails used by local communities would be closed without other arrangements being made or the communities consulted; <sup>212</sup>	Contrary response at Table 2, Item 37.
37	heavy use of informal trails had become a ‘serious risk for conservation’ and had led to a profusion of eroding trails in the CNP; <sup>213</sup>	Table 2, Items 37, 45 & 72. Draft Plan 2020, pp. 58, 81, 88, 94, 96,

<sup>209</sup> Submission No 40, p. [2].

<sup>210</sup> Submission No 92, p.2.

<sup>211</sup> Submission No 78, p. [1].

<sup>212</sup> Submission No 78, p. [2].

<sup>213</sup> Submission No 92, p.2.

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
38	plans for expanding access for 'booked group events' in the CNP had the potential for 'significantly adverse' effects, particularly as some areas and ecosystems were significantly more sensitive than others, thus invalidating the 100-person threshold indicated in the Draft Plan for events requiring formal permission, and in view of the fact that some activities were inherently incompatible with the primary management goal for the CNP; <sup>214</sup>	Table 2, Item 52. Table 3, Item 70. See Draft Plan 2020, pp. 98-99, 100.
39	many urban open spaces being more suitable for group events than reserves in the CNP; <sup>215</sup>	No apparent response
40	dog walking outside of formal tracks and trails, with further compliance activity necessary to reduce and remove current risks to biodiversity, particularly in view of formal research showing that dog-walking represented significant potential for harm to native wildlife; <sup>216</sup>	Table 2, Item 50
41	too much was being expected of the CNP 'in terms of accommodating recreational activities and community events', and as a result reserves in the CNP were being 'degraded', particularly by 'people creating unauthorised trails', including mountain bikers; <sup>217</sup>	Table 2, Item 72
42	CNP reserves being in danger of significant damage from over-use, including in particularly sensitive woodlands areas of the CNP, leading to a potential for loss of environmental value, including from bike use, and policies flagged in the Draft Plan could make this problem worse; <sup>218</sup>	Table 2, Item 72

<sup>214</sup> Submission No 29, p. [5].

<sup>215</sup> Submission No 92, p.2.

<sup>216</sup> Submission No 66, p. [1], referencing Peter B. Banks and Jessica V. Bryant, 'Four-legged friend or foe? Dog walking displaces native birds from natural areas', *Biology Letters* (2007) 3, 611–613, doi:10.1098/rsbl.2007.0374, published online 4 September 2007.

<sup>217</sup> Submission No 92, p. [1].

<sup>218</sup> Submission No 69, p.2.

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
43	residential urban design should be changed so as to reduce the burden of use on the CNP and protect its conservation value; <sup>219</sup>	Draft Plan 2020, pp. 34, 59, 228.
44	current policy settings and perceptions, attributing greater environmental damage to horse-riding, were discriminatory and based on discredited science; <sup>220</sup>	Table 2, Items 54 & 55. Appendix 5 of Draft Plan 2019 not present in Draft Plan 2020.
45	it had not been established that horse-riding was any more damaging to environmental values than other activities and, indeed, tended to be less so because horse-riders tended to comply with restrictions; <sup>221</sup>	As above
46	other jurisdictions had adopted a more inclusive approach to horse-riding in reserves and national parks; <sup>222</sup>	No apparent response
47	Appendix 5 in the 2019 Draft Plan, in which the most restrictive and discriminatory policy statements about horse-riding were made, should be removed (which it was in the 2020 Plan). <sup>223</sup>	Table 2, Items 54 & 55. Appendix 5 of Draft Plan 2019 not present in Draft Plan 2020.
	Chapter 8, 'Community involvement'	

<sup>219</sup> Submission No 69, p.2.

<sup>220</sup> Submission No 71, p.4.

<sup>221</sup> Submission No 71, p.4, and Submission No 97, p. [2].

<sup>222</sup> Submission No 71, p.4.

<sup>223</sup> Submission No 42, p. [1]; Submission No 71, p. [1]; Submission No 76, pp. [1-2]; Submission No 16, pp. 1, 2, 4, 5 & 6; and Submission No 97, pp. 2,3 & 6.

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
48	previously there had been Ranger-led walks in CNP reserves but in recent decades rangers' workloads were such that there was no capacity for community liaison and education., and that support for school and community service activities had been left to the Park Care Ranger, however one position was not sufficient to support this function; <sup>224</sup>	Table 2, Item 62. See Draft Plan 2020, pp. 111 & 230.
49	an 'absence of an organisational focus' had led to there being 'no specific CNP education programs for schools and everyday users', except for events run by Park Care groups and the Woodlands and Wetlands Trust; <sup>225</sup>	As above
50	a single Park Care Ranger position was not sufficient to support volunteer groups to provide education programs; <sup>226</sup>	As above
	Chapter 9, 'Research and monitoring'	
51	support for Draft Plan's 'sound principles' for research and monitoring, approved of the Plan referring to 'an evidence-based framework to underpin management decisions', and for the 'policies, objectives and actions' summarised in Section 9.4; <sup>227</sup>	Draft Plan 2020, pp. 8 & 117.
52	the Conservation Effectiveness Management Plan should be used to develop high level targets against which the success of the Draft Plan could be measured; <sup>228</sup>	Table 2, Items 14 & 67. Table 3, Item 26. Draft Plan 2020, pp. 117, 119 & 231.
53	there should specific and continuing budget allocations for biodiversity monitoring and reporting; <sup>229</sup>	Table 2, Items 68 & 75.

<sup>224</sup> Submission No 92, p.3.

<sup>225</sup> Submission No 92, p.3.

<sup>226</sup> Submission No 92, p.3.

<sup>227</sup> Submission No 69, p.3.

<sup>228</sup> Submission No 94, p.11.

<sup>229</sup> Submission No 94, p.11, Submission No 100, p.5.



<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
54	Chapter 9 should acknowledge that the CNP sits 'within an urban matrix'; that threats outside park boundaries, particularly weeds, should be 'actively managed'; and that there should be 'a cohesive management regime' in the ACT; <sup>230</sup>	No direct response
55	concern that within the CNP research and monitoring efforts were 'not equitably distributed, in that older reserves did not attract the same investment in research as those closer to newer residential developments; <sup>231</sup>	No direct response
	Chapter 10, 'Planning, Approvals and Compliance'	
56	public activity contrary to management plan objectives was routine in the CNP; <sup>232</sup>	Table 2, Items 43, 45, 49, 72 & 74.
57	compliance activities were 'critical' and needed to be 'properly resourced'; <sup>233</sup>	As above
58	the Chapter should be strengthened by referencing a Code of Practice developed for Actew and its contractors when working in the CNP; <sup>234</sup>	Table 3, Items 95 & 96. Draft Plan 2020, pp. 80, 81 & 122.
59	insufficient levels of compliance activity would result in even lower levels of compliance amongst visitors to the CNP; <sup>235</sup>	As above

<sup>230</sup> Submission No 92, p.3.

<sup>231</sup> Submission No 92, p.3.

<sup>232</sup> Submission No 94, p.11.

<sup>233</sup> Submission No 92, p.3.

<sup>234</sup> Submission No 92, p.3.

<sup>235</sup> Submission No 100, p.5.

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
60	insufficient levels of compliance activity were notable for dog walking in the CNP, where failure to respect expectations by dog owners led to direct harm for native animals and, indirectly, to users of roads on the boundary of CNP reserves, as well as failures to dispose of dog faeces appropriately; <sup>236</sup>	Table 3, Items 62, 63 & 74.
	Part 2, 'Reserve Complexes'	
61	concern as to whether the Draft Plan acknowledged and made adequate arrangements for 'the special values of some reserves, and that it tended to 'treat CNP reserves uniformly in terms of priorities'; <sup>237</sup>	No direct response
62	concern that events involving large numbers of people had been approved in sensitive woodland reserves such as Callum Brae; <sup>238</sup>	Table 2, Item 53. Draft Plan 2020, pp.98-99.
63	sanctuaries in the Mulligans Flat and Goorooyarroo reserves could be given higher priority for key actions, such as managing species and ecosystems, and that the Plan should indicate 'all important management issues', including strategies for the Sanctuaries; <sup>239</sup>	Table 2, Item 16,
64	reserve summary profiles in the Plan were 'helpful', but that activities within each reserve to 'conserve, protect and enhance biodiversity' would only be determined with the release of Operational Plans for all CNP reserves; <sup>240</sup>	Table 2, Items 8 & 73.
65	it was disappointing that an opportunity to group CNP units into ecosystems that matched key strategies such as Woodland or Grassland Strategies had been missed; <sup>241</sup>	No apparent response

<sup>236</sup> Submission No 101, pp.1-2.

<sup>237</sup> Submission No 69, p.3.

<sup>238</sup> Submission No 69, p.3.

<sup>239</sup> Submission No 69, p.3.

<sup>240</sup> Submission No 94, p.2.

<sup>241</sup> Submission No 40, Attachment A, p. [1].

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
66	there had been problems in the way previous CNP draft management plans had interacted with other key environmental strategies, and this should have been corrected in the Plan; <sup>242</sup>	Table 2, Items 7 & 9.
67	the table at Appendix 3 of the Draft Plan, linking IUCN objectives to CNP actions, could form the basis for management plans for areas outside of the CNP; <sup>243</sup>	No apparent response
68	edge effects should be considered in the planning of new residential developments before they were built; <sup>244</sup>	No apparent response. Draft Plan 2020, p.110.
69	current planning for residential developments was often at odds with conservation objectives; <sup>245</sup>	As above
70	connectivity between reserves, including that provided by land not within the CNP, is important for its resilience, and there should be cooperation, to that end, between government agencies; <sup>246</sup>	Table 2, Item 11 and see CNP Draft Plan 2020, pp. 33-35, 238.
71	a key action in the Draft Plan for Mount Ainslie and Mount Majura, to manage increasing recreation activity in the reserve 'through improved signage and enforcement', was a 'very poor approach to both encouraging recreational use and minimising adverse impacts', and that a better approach would be to create of a 'well located and well-maintained' network of trails that would cater for expected higher rates of recreational use; <sup>247</sup>	Table 2, Item 36

<sup>242</sup> Submission No 40, Attachment A, p. [1].

<sup>243</sup> Submission No 94, p.3.

<sup>244</sup> Submission No 94, pp.3-4.

<sup>245</sup> Submission No 94, pp.3-4.

<sup>246</sup> Submission No 94, pp.3-4.

<sup>247</sup> Submission No 78, p. [3].

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
72	the map for Red Hill reserve on the PCS website showed only one walking trail, implying that all the other 'long-standing' walking trails were all informal, including a section of the Centenary Trail leading from Mugga Way up to Red Hill, and in view of the current 'very high level' of passive recreation activity in the reserve, consideration should be given to improving the network of multi-use trails, including better support for increasing mountain bike use; <sup>248</sup>	No apparent response. Draft Plan 2020, pp.87-88.
73	park zoning at Red Hill was anomalous and was problematic for bushfire control, including controlled burns; <sup>249</sup>	No apparent response
74	for the Mount Taylor reserve there should be an action to 'protect and improve Pink-tailed Worm-lizard habitat' as well as the current 'monitor', and to maintain 'groundcover and connecting high quality habitat'; <sup>250</sup>	Draft Plan 2020, p.210.
75	at Mount Taylor, kangaroo grazing was having 'adverse impacts' on vulnerable species, and that Mount Taylor should be included in the ACT Kangaroo Management Plan; <sup>251</sup>	Response not indicated
76	there was 'significant deterioration' of tracks at Mount Taylor, and there should be a specific action to 'upgrade and maintain the walking track network' to respond to high rates of recreational use; <sup>252</sup>	Draft Plan 2020, p.210.
77	proposals to explore further opportunities for horse-riding at Mount Taylor were 'totally at odds' with policies set out in Section 7.4.5 of the Draft Plan; <sup>253</sup>	Draft Plan 2020, p.93.
	Implementation	

<sup>248</sup> Submission No 78, pp. [3-4].

<sup>249</sup> Submission No 78, pp. [3-4].

<sup>250</sup> Submission No 92, p.3.

<sup>251</sup> Submission No 92, p.3.

<sup>252</sup> Submission No 92, p.4.

<sup>253</sup> Submission No 92, p.4.

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
78	providing 'sufficient resources', including 'staff, operational and capital funding' was critical to ensuring that the Plan could achieve its 'conservation goals and objectives' and goals to 'encourage visitors and minimise impacts'; <sup>254</sup>	Table 2, Items 23, 62, 68 & 74.
79	the 'strategies, including support and personnel investment needed for Compliance Management [were] not clearly laid out and [needed] to be explicitly and with detail included in The Plan'; <sup>255</sup>	No direct response
80	'general funding for the management of the Canberra Nature Park [remained] inadequate for the work that [needed] to be undertaken'; <sup>256</sup>	Table 2, Items 23, 62, 68 & 74
81	it was 'essential that appropriate levels of budget funding [were] maintained to cover the management of [the] CNP'; <sup>257</sup>	Table 2, Items 23, 62, 68 & 74
82	to 'achieve the desired outcomes in CNP, the ACT [needed] to increase the annual investment in CNP for nature conservation, restoration/rehabilitation, management and public education'; <sup>258</sup>	Table 2, Items 23, 62, 68 & 74
83	the ACT should provide resources to 'enforce compliance and [actively] educate or consider the ban of certain activities' and to 'maintain infrastructure in particular tracks that should reflect the high usage of Zone 1 core conservation sites'; <sup>259</sup>	Table 2, Items 23, 62, 68 & 74

<sup>254</sup> Submission No 92, p. [1].

<sup>255</sup> Submission No 98, p. [1].

<sup>256</sup> Submission No 94, p.3.

<sup>257</sup> Submission No 100, p.2.

<sup>258</sup> Submission No 100, p.2.

<sup>259</sup> Submission No 98, p. [4].

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
84	stronger linkages were needed between actions and imperatives set out in the Draft Plan, and between the Draft Plan and other key policies and documents in related areas; <sup>260</sup>	Table 2, Item 7
85	that the goals set out in the Plan needed to be ‘specific, measurable, attainable, relevant and time-based’, and that without ‘clarity of overarching goals, objectives, actions’, it was difficult to ‘monitor and evaluate what is being achieved through the plan’, in which there was ‘an abundance of objectives but no clear plan to address them’; <sup>261</sup>	No apparent response
86	the Draft Plan’s objectives, policies and actions required further clarification, ‘particularly with respect to interlinkages’, so as to establish ‘firm, clear, measurable targets and outcomes’; <sup>262</sup>	No apparent response
87	concern over whether the Plan would ‘balance the proper protection of environmental values in reserves, versus recreation’, because the Plan appeared to give further encouragement to recreational use and it was important that management of the CNP should prioritise the environmental values which the reserves were created to protect; <sup>263</sup>	Table 1, Item 1

<sup>260</sup> Submission No 94, p.2; Submission No 29, p. [1], Submission No 84, p.1; Submission No 40, Attachment A, p. [3]; Submission No 69, p. [1]; and Submission No 78, p. [1].

<sup>261</sup> Submission No 96, p. [2].

<sup>262</sup> Submission No 96, p. [2].

<sup>263</sup> Submission No 69, p. [1.]

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
88	despite the clear primary objective of CNP as environmental conservation, 'the general thrust of the 2019 Plan' had 'shifted towards recreation' which appeared to be placed 'on the same level as the conservation of the natural environment'; statements in the Draft Plan suggesting the need to balance nature conservation and recreation did not appear to take into account the primary managing objective of nature reserves, and it was not clear who would decide when recreational activities got to the point where they were inconsistent with the protection of the natural environment, or what data would be used to inform decisions; <sup>264</sup>	Table 1, Item 1
89	the Draft Plan was 'generally based on the past' and did not attend sufficiently to the 'actual reality of today'; future plans would be 'dictated' by climate change and populations and use by animals and humans, and future outcomes would depend on how the ACT responded to these changes, which would also have profound resource implications; <sup>265</sup>	No apparent response
90	the Draft Plan had not taken sufficient account of previous findings and recommendations, in particular the recommendations of a 2011 report on the CNP by the ACT Commissioner for Sustainability and the Environment; <sup>266</sup>	No apparent response
91	while the Draft Plan set out a 'comprehensive list' of actions for the next ten years, it was unclear what success 'would look like' for protecting the ACT's critically endangered Natural Temperate Grassland, Yellow-Box-Red Gum Grassy Woodland, and threatened plant, bird and fauna species; <sup>267</sup>	No apparent response

<sup>264</sup> Submission No 98, p. [1].

<sup>265</sup> Submission No 95, p.1.

<sup>266</sup> Submission No 98, p. [4].

<sup>267</sup> Submission No 94, p.1.

<i>Item</i>	<i>Concern</i>	<i>Government response in 2020 Draft Plan</i>
92	the Plan needed 'biodiversity benchmarks or targets' which contained 'a baseline of existing threatened fauna and flora' and provided for their status to be monitored periodically, but without specific targets 'to improve habitat for species' and 'clear actions to meet those targets', threatened species would 'continue to be impacted' and their numbers would 'continue to decline'. <sup>268</sup>	No apparent response
	[End]	

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<sup>268</sup> Submission No 96, p. [3].



## COMMENTS AND RESPONSES FROM THE CONSULTATION REPORT

The following is taken from tables in the *Canberra Nature Park Draft Reserve Management Plan Consultation Report, 2020*.<sup>269</sup>

*Table 2 - Consultation Report Comments & Responses with references to Table 1 concerns*

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<u>Chapter 1:</u> <u>Introduction</u>	
	<i>Canberra Nature Park and future reserves (14 comments in 8 submissions)</i>	
<b>1</b>	Why are Molonglo River Reserve and Jerrabomberra East not included in Canberra Nature Park and the plan?	No change required. Molonglo River Reserve, which includes Kama Nature Reserve, is part of Molonglo River Reserve, which has a separate reserve management plan. Jerrabomberra East will be incorporated into Canberra Nature Park when it is declared a reserve under the Territory Plan.
<b>2</b>	Proposed new reserves (Franklin Nature Reserve) should be incorporated into the Plan.	The revised draft Plan incorporates Franklin Grasslands Nature Reserve as part of Canberra Nature Park. Franklin Grasslands was declared a reserve under the Territory Plan in 2020.

<sup>269</sup> Environment, Planning and Sustainable Development Directorate, *Canberra Nature Park Draft Reserve Management Plan Consultation Report, 2020*, viewed 9 July 2021, available at: [https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.act-yoursay.files/5216/1300/7842/2020\\_CNP\\_Consultation\\_Report\\_-\\_39\\_Reserves\\_-\\_ACCESS.pdf](https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.act-yoursay.files/5216/1300/7842/2020_CNP_Consultation_Report_-_39_Reserves_-_ACCESS.pdf)

<i>Item</i>	<i>Comments</i>	<i>Response</i>
<b>3</b>	Several locations (e.g. Mt Rogers) and areas managed by PCS abutting the park should be added to Canberra Nature Park.	<p>Additional information has been added to the Plan to explain the mechanisms by which additional areas could be added to Canberra Nature Park.</p> <p>Mt Rogers is urban open space, managed by TCCS. PCS will review the values of Mt Rogers to determine whether the area is a priority for inclusion in Canberra Nature Park.</p> <p>PCS is reviewing areas adjacent to reserves that are managed by PCS for potential incorporation into Canberra Nature Park. Technical amendments or variations to the Territory Plan may be required to incorporate some areas.</p>
	Management goals and key outcomes (5 comments in 5 submissions)	
<b>4</b>	It is essential the plan makes clear that conservation is prioritised over all other objectives.	Various sections in the plan have been revised to clarify that conservation is prioritised over other objectives, including a reordering of the management goals and key outcomes. As outlined in the Plan, the primary objective for the management of Canberra Nature Park is to conserve the natural environment.
<b>5</b>	The Plan's recognition of the importance of Traditional Custodians, their culture and land management practices is supported.	Additional recognition has been given to the importance of involving Ngunnawal Traditional Custodians in the management of Canberra Nature Park; this important issue has been included in the Plan's vision. A new section has been added about the Dhawura Ngunnawal Caring for Country Committee and several other sections have been revised in consultation with the Committee.
<b>6</b>	Recreation, health and tourism activities should be sympathetic to the social and cultural values of the	The primacy of nature conservation over other activities has been further emphasised in several sections, including a change in the order of goals. Balancing recreational use with the conservation of reserve values is an ongoing challenge for PCS. Permitted recreational activities may be reviewed if found to

<i>Item</i>	<i>Comments</i>	<i>Response</i>
	Park, and not put at risk the ecological values.	have a significant impact on reserve values. Any proposed new activities in reserves will be rigorously assessed and only permitted where there will be no adverse impacts on the values of reserves.
	<i>Management framework (11 comments in 9 submissions)</i>	
<b>7</b>	The Plan should clearly explain the relationship between various strategies and management of the reserves.	Additional information has been added to clarify the relationship between conservation strategies and reserve management. Figure 1.2, which shows the key elements that guide management of Canberra Nature Park, refers to the role of grassland, woodland, aquatic and riparian, pest and weeds strategies in setting management goals and shows the linkages from strategies down through the management plan to implementation and operations plans and on ground works. The relationship between ACT conservation strategies and reserve management is discussed in several places and additional information has been provided in some areas. Implementation and operations plans, when developed, will further clarify this relationship.
<b>8</b>	Operational plans should be developed for all individual reserves.	Additional information has been added to the Plan, including a new action to 'develop five yearly implementation plans and, in consultation with stakeholders, annual operations plans'. PCS will continue to develop annual operations plans for Canberra Nature Park in consultation with ParkCare groups and other key stakeholders. However, for management purposes, operations plans may be developed for groups of reserves, rather than individual reserves.
	<i>Legislation (4 comments in 3 submissions)</i>	

<b>Item</b>	<b>Comments</b>	<b>Response</b>
<b>9</b>	Linkages between the legislative and policy framework and individual reserve Plans should be more explicit.	Comments noted. Section 1.8 of the Plan discusses key legislation for Canberra Nature Park and Appendix 2 describes other relevant legislation, strategies and action plans relevant to the Plan. This level of detail will be included in implementation and operations plans which will further clarify these linkages.
<b>10</b>	Activities Declarations should be made for reserves that currently do not have one.	Minor changes have been made to the text to clarify the purpose of Activities Declarations. The requirement for Activities Declarations for all reserves is recognised and the Conservator of Flora and Fauna will continue to develop Activities Declarations for all Canberra Nature Park reserves.
	<i>Development and Land Planning (14 comments in 11 submissions)</i>	
<b>11</b>	The Plan should address the impacts of neighbouring development on reserves.	Changes have been made to Section 8.3 Neighbours to emphasise the importance of working collaboratively with neighbours to reduce impacts on reserve values. The Plan notes how the urban interface and associated edge effects impact biodiversity, and how urbanisation has modified vegetation and reduced connectivity across the landscape. There is an action in the Plan that PCS will work with other agencies and neighbours to improve connectivity between reserves and minimise impacts of development on reserve values.
<b>12</b>	New urban areas should be designed in a way that reduces impacts on neighbouring reserves. For example, ensuring adequate areas for recreation [to reduce	Comments noted. These broader urban planning issues are outside the scope of this Plan. The ACT Planning Strategy sets out broad objectives for the future planning of the ACT. The ACT Government's urban development policy is outlined in the Territory Plan, which guides planning and development in the ACT.

<i>Item</i>	<i>Comments</i>	<i>Response</i>
	pressure on reserves] and ensuring appropriate buffer zones.	New development areas in the ACT are required to include inner asset fire protection zones and urban edge roads within the urban boundary to reduce impacts on reserves.
<b>13</b>	Management agreements should be required with all utility providers operating in Canberra Nature Park reserves.	<p>Comment noted. The use of fire in Canberra Nature Park is a valuable management tool to conserve the biodiversity values of different ecosystems and species. Controlled burning can help conserve biodiversity by promoting a mosaic of habitats, and by considering ecological thresholds and other evidence-based guidelines that aim to protect species. Ecological guidelines for fire fuel management are developed to support ecological outcomes.</p> <p>High conservation values of reserves are considered in the implementation of the SBMP.</p>
	<u>Chapter 2 – Plants and Animals</u>	
	<i>Significant species/ ecosystem management (11 comments in 8 submissions)</i>	
<b>14</b>	While the Plan lays out a comprehensive list of actions to be undertaken in the next 10 years, it is unclear what success will look like. Benchmarks and targets should be provided for threatened flora and	<p>Comments noted. Benchmarks and targets for flora and fauna are in associated documents and will be included in implementation planning. Monitoring is an integral part of evaluating the effectiveness of management actions in achieving nature conservation objectives.</p> <p>Threatened flora and fauna have action plans that guide management for each species. Action plans can be found on the Environment, Planning and Sustainable Development Directorate (EPSDD) website at: <a href="https://">https://</a></p>

<i>Item</i>	<i>Comments</i>	<i>Response</i>
	fauna, and monitoring should be carried out periodically.	<p><a href="http://www.environment.act.gov.au/cpr/conservation_and_ecological_communities">www.environment.act.gov.au/cpr/conservation_and_ecological communities</a></p> <p>The Conservation Effectiveness Monitoring Program (CEMP) is an overarching ecosystem condition monitoring framework for the ACT conservation estate. The CEMP aims to create a coordinated, systematic, and robust biodiversity monitoring program that will detect changes in ecosystem condition within reserves, evaluate the effectiveness of management actions in achieving conservation outcomes, and provide evidence to support land management decisions.</p> <p>A key component of the program is to develop target conditions and monitoring plans for the ecosystem units within the ACT reserve system. Further information can be found at: <a href="https://www.environment.act.gov.au/data/assets/pdf_file/0004/1059241/Conservation-effectiveness-monitoring-program.pdf">https://www.environment.act.gov.</a></p>
<b>15</b>	Actions should be identified to protect specific species in some individual reserves.	<p>Minor revisions have been made to the Plan to include additional actions for the conservation of specific species and communities in some individual reserve summaries in Part 2 of the Plan.</p> <p>Management of Canberra Nature Park incorporates the requirements of action plans for threatened species into reserve management. These requirements will be incorporated into implementation and operations Plans. Action plans can be found on the EPSDD website at: <a href="https://www.environment.act.gov.au/cpr/conservation_and_ecological_communities">https://www.environment.act.gov.au/cpr/conservation_and_ecological_communities</a></p>
	<i>Native wildlife management (6 comments in 6 submissions)</i>	

<b>Item</b>	<b>Comments</b>	<b>Response</b>
<b>16</b>	The Plan should discuss the different issues for wildlife management within the predator-proof fence at Mulligans Flat.	Additional information has been added to the Plan to acknowledge the special circumstances applying in the Mulligans Flat Sanctuary and that a different approach to wildlife management and other activities may be required. PCS, the Woodlands and Wetlands Trust and their research partners are currently developing a strategy for the Sanctuary. The EPSDD Environment Division is also preparing a Conservation Action Plan for the Mulligans Flat/Goorooyarroo Sanctuary.
<b>17</b>	Water should be provided for wildlife in some reserves.	Comments noted. There are many dams across Canberra Nature Park that wildlife can access for water. There is insufficient evidence that the provision of water will have a broad ecological benefit across Canberra Nature Park and there are no plans to increase the number of water points for wildlife.
	<i>Connectivity (8 comments in 6 submissions)</i>	
<b>18</b>	<p>Working outside of Canberra Nature Park boundaries to increase connectivity is supported.</p> <p>Working with urban tree planters is identified as an ideal opportunity to improve connectivity between reserves.</p>	<p>The Plan has been revised to include reference to the Living Infrastructure Plan and draft Urban Forest Strategy and an action added to 'ensure consideration of connectivity and linkages in the implementation of the Urban Forest Strategy'.</p> <p>While it is beyond the scope of the Plan to undertake work outside the reserve boundaries, the Plan notes that PCS will continue to liaise with other agencies and land managers to help improve connectivity between reserves, through urban areas, and across the broader landscape. The importance of connectivity is recognised in the Plan in more than 140 references.</p> <p>In the individual reserve profiles in Part 2 of the Plan, actions relating to connectivity have been added to the reserves that are particularly important for this issue.</p>

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<i>Fire management (7 comments in 7 submissions)</i>	
<b>19</b>	Fire management should be informed by the latest science to support ecological outcomes.	<p>Minor revisions have been made to emphasise that ecological guidelines for fire fuel management activities are evidence-based.</p> <p>Fire management is carried out in accordance with the Strategic Bushfire Management Plan (SBMP), including ecological fire management guidelines. One of the key long-term goals of the Canberra Nature Park Plan is to ensure scientific evidence underpins management decisions.</p> <p>The Plan states that fire fuel management activities are subject to evidence-based ecological guidelines that aim to protect rare, threatened and fire-sensitive species. Research into the relationship between fire and plant and animal species is ongoing and will inform an adaptive management approach.</p>
<b>20</b>	Fire management is critical to protect human life and assets.	<p>Comments noted. PCS recognises that fire management is important to protect human life and assets; this needs to be balanced with the conservation of nature within the reserves. Fire management is carried out in accordance with the Strategic Bushfire Management Plan (SBMP) and the goal of much prescribed burning is to protect Canberran suburbs from the risk of uncontrolled fire.</p>
<b>21</b>	Fire management should support ecological outcomes.	<p>Comment noted. The use of fire in Canberra Nature Park is a valuable management tool to conserve the biodiversity values of different ecosystems and species. Controlled burning can help conserve biodiversity by promoting a mosaic of habitats, and by considering ecological thresholds and other evidence-based guidelines that aim to protect species. Ecological guidelines for fire fuel management are developed to support ecological outcomes.</p>



<i>Item</i>	<i>Comments</i>	<i>Response</i>
		High conservation values of reserves are considered in the implementation of the SBMP.
<b>22</b>	Fuel reduction activities should be undertaken at several specific locations.	Comment noted. Fuel management activities in specific locations are incorporated into annual Bushfire Operational Plans (BOPs), required under the Emergencies Act. A range of issues are considered in the development and implementation of these BOPs. This includes, but is not limited to, the protection of human life and other assets, fire history and ecological fire thresholds.
	<i>Pest animal/ invasive Plant management (15 comments in 10 submissions)</i>	
<b>23</b>	There is a need for ongoing investment in invasive plant and pest animal control.	<p>Comments noted. Ongoing investment in invasive plant and pest animal control is subject to the ACT Government budget cycle and government priorities.</p> <p>The Plan recognises that invasive plants and pest animals cause environmental, social and economic damage to Canberra Nature Park reserves. Key objectives in the Plan are to exclude, eradicate or control invasive species to minimise their adverse impacts on conservation values. Invasive plant and pest animal control are guided by relevant strategies.</p>
<b>24</b>	Cats are a significant threat to wildlife; the whole of ACT should be a cat containment area.	Comments noted. This is a broader issue. The Plan outlines the significant threat posed by roaming domestic cats. However, there are currently no practical options for broad-scale stray/feral cat control in Canberra Nature Park other than cat containment in adjacent suburbs. More detail on the issue of roaming cats and the ACT Government's policy response, is outlined in the Draft ACT Cat Plan (2019-2029).

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<i>Climate change (6 comments in 6 submissions)</i>	
<b>25</b>	Action is needed now to increase the resilience of our species and ecological communities to future impacts of climate change. Suggested actions include restoration work, suitable buffers against ecological threats, appropriate fire management, maintaining and restoring diversity in ecological communities and maintaining large, well-connected and genetically diverse populations.	<p>Comments noted. Section 2.5.8 of the Plan discusses the impacts of climate change. The Plan includes several approaches and actions to enhance the resilience of species and communities to the impacts of climate change. Prioritisation is given to restoration activities that increase connectivity, condition and resilience of sites across Canberra Nature Park.</p> <p>Promoting resilience through maintaining and restoring native plant diversity, controlling non-climate change stressors (e.g. invasive species), and managing and protecting climate refugia are also identified as approaches to mitigate the impacts of climate change. The ACT Climate Change Strategy 2019–2025 and other relevant documents that discuss climate change are referred to in the Plan.</p>
<b>26</b>	Progressive management and practical planning for the future is required.	<p>Comments noted. EPSDD is doing considerable work on managing ecosystems in the face of predicted climate change. Understanding climate change projections for the ACT, their impacts for species and ecosystems, and how management can respond to these, is highlighted as a key theme in the EPSDD Environment Division Science Plan, currently in the late stages of development. This research is critical to achieving Action 32 of the Plan, to develop management responses for those species and communities most at risk to the impacts of climate change.</p>

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<u>Chapter 3 — Land and water</u>	
	<i>Geology (7 comments in 2 submissions)</i>	
<b>27</b>	There should be more information on the geology of Canberra Nature Park and why geological features are valued.	<p>The Plan has been revised to include additional information on the geology of Canberra Nature Park and the importance of protecting sites of geological significance.</p> <p>A map of soil landscapes of Canberra Nature Park has been included.</p>
	<u>Chapters 4 and 5 — Aboriginal Connection to Country and Historic Heritage</u>	
	<i>Aboriginal Heritage/ Knowledge (14 comments in 7 submissions)</i>	
<b>28</b>	<p>Aboriginal connection to Country and cooperative management with Traditional Custodians is strongly supported.</p> <p>Traditional knowledge and cultural practices should be promoted and inform reserve management.</p>	<p>The vision for Canberra Nature Park has been changed to include the involvement of Ngunnawal Traditional Custodians in the management of Canberra Nature Park. A new section has been added about the Dhawura Ngunnawal Caring for Country Committee. Several other sections have been revised in consultation with the committee.</p> <p>EPSDD will continue to work with the Dhawura Ngunnawal Caring for Country Committee and Ngunnawal Traditional Custodians to support Ngunnawal engagement in caring for Country and to progress co-management of reserved lands.</p>

<i>Item</i>	<i>Comments</i>	<i>Response</i>
		An objective of the Plan is to incorporate traditional ecological knowledge into reserve management to improve environmental and cultural outcomes.
<b>29</b>	There should be increased engagement with Aboriginal people and greater Ngunnawal involvement in managing Canberra Nature Park.	Comment noted. See above.
<b>30</b>	A cultural survey should be undertaken to identify and protect additional Aboriginal heritage sites.	Action 42 of the Plan is to undertake an assessment of Aboriginal cultural heritage across Canberra Nature Park in partnership with Ngunnawal Traditional Custodians, Representative Aboriginal Organisations and the ACT Heritage Council.
	<i>Historic Heritage (2 comments in 1 submission)</i>	
<b>31</b>	In addition to the focus on natural values, the Plan could also emphasise care for all heritage places, not just those on the Heritage Register.	Comments noted. The Plan provides information, objectives and actions to work with relevant stakeholders to protect all Aboriginal and non-Aboriginal heritage sites (see Chapters 4 and 5). The Plan also includes actions to protect, manage and interpret historic heritage and develop Conservation Management Plans for significant historic heritage places.
	<u>Chapter 6 — Zoning and Access</u>	

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<i>Management zones (20 comments in 8 submissions)</i>	
<b>32</b>	The proposed management zoning is supported and would benefit from clarification of which recreational activities are appropriate for each of the zones.	Comments noted. The primary purpose of zoning in the Plan is to ensure impacts from infrastructure development or other disturbances are directed outside of reserves or into the less sensitive areas of Canberra Nature Park. Zoning will also inform approval decisions for group recreational events. Aligning zoning with short- term or individual recreational activities, such as dog walking, was tested during development of the draft Plan but could not be consistently applied across the zoning of all Canberra Nature Park reserves.
<b>33</b>	The proposed management zoning should be reviewed to address implications for fire management.	Comments noted. Management zoning in the Plan is based on values, with conservation of natural values a key consideration in line with the primary management objective for the reserves. Section 2.5.3 of the Plan discusses the role of the Emergencies Act, SBMP, BOPs and the Regional Fire Management Plan, as well as the Inner and Outer Asset Protection Zones, in undertaking fire fuel management in Canberra Nature Park reserves.
	<u>Chapter 7 — Nature-based Experiences</u>	
	<i>Recreation — Tourism strategy (6 comments in 6 submissions)</i>	
<b>34</b>	There is a need for an ACT wide recreation and tourism strategy rather than an expansion of activities	Comments noted. The Plan refers to the development of a Visitor Experience Strategy that will outline policy and priorities for recreational use of all ACT parks and reserves, including future recreational and commercial opportunities.

<i>Item</i>	<i>Comments</i>	<i>Response</i>
	in Canberra Nature Park.	
<b>35</b>	The focus for Canberra Nature Park should be on conservation rather than tourism and events.	Various sections in the Plan have been strengthened to clarify that conservation is prioritised over other objectives, including a reordering of the management goals and key outcomes.  Throughout the Plan it is recognised that the primary objective for management of Canberran Nature Park is conservation of the natural environment.
	<i>Recreation — Maintenance and upgrades, tracks and trails (16 comments in 7 submissions)</i>	
<b>36</b>	The network of tracks and trails should be upgraded, maintenance improved, and a tracks and trails classification applied.	The Plan includes an action to review all tracks and trails and prepare a track management plan for Canberra Nature Park.  Track and trail issues, upgrades and the balance of multi-use and other tracks will be considered in this review, as well as classification of tracks and trails in accordance with Australian standards.  Track and trail maintenance issues raised at specific locations have been forwarded to the PCS Director Urban Reserves for consideration in the operational works program. Any works will be subject to competing priorities and the availability of resources.
<b>37</b>	Closing of unauthorised trails is supported.	Comments noted. The Plan proposes a review of tracks and trails, and the preparation of a track management plan will consider the closure of informal tracks.
	<i>Recreation — Maintenance and upgrades, signage and notice boards (2</i>	

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<i>comments in 2 submissions)</i>	
<b>38</b>	Damaged signs or notice boards should be promptly repaired or replaced.	Comments that identified damaged signs and notice boards at specific locations have been forwarded to the PCS Director Urban Reserves for consideration in the operational works program. Any works will be subject to competing priorities and the availability of resources.
	<i>Community Education — Signage (9 comments in 8 submissions)</i>	
<b>39</b>	Better and more consistent information is required on reserve signage, particularly in relation to dog walking rules, track information and reserve values.	The Plan notes that PCS will roll out additional signage throughout Canberra Nature Park in 2020–2021 and will continue to inform reserve users of their responsibilities through other means, including website information, direct contact and social media.
<b>40</b>	More information should be made available about what activities are permitted and in which locations.	Comments noted. The Plan outlines allowable recreation activities in each reserve (Table 7.1 and Part 2 individual reserve profiles). More detailed reserve profiles, including maps of tracks and trails and information on recreational activities, will be available on the EPSDD website.
<b>41</b>	Information on tracks and trails should be improved, both within reserves (signs), and in online content (better maps).	<p>PCS will roll out additional signage throughout Canberra Nature Park in 2020-2021.</p> <p>Maps of tracks and trails will be included in full reserve profiles on the EPSDD website.</p>

<i>Item</i>	<i>Comments</i>	<i>Response</i>
<b>42</b>	Best practice guidelines should be available for all recreational activities.	<p>The Plan has been revised to include new best practice guidelines for bouldering, orienteering and rogaining, developed in consultation with recreational groups. Some amendments have been made to other best practice guidelines, such as for geocaching.</p> <p>Best practice guidelines are available for the most popular recreational activities in Canberra Nature Park. These include horse riding, dog walking, cycling and mountain biking, geocaching, bouldering, orienteering and rogaining. Consideration will be given to providing this information on the EPSDD website.</p>
	Recreation — Unauthorised (5 comments in 5 submissions)	
<b>43</b>	Unauthorised activities are causing degradation of reserves, e.g. the creation of informal tracks, dogs off- leash chasing wildlife, dog faeces left on the ground, dumping of rubbish and unauthorised vehicle entry.	<p>The section on nature-based activities has been revised to emphasise the importance of appropriate behaviour by recreational users, such as dog walkers and cyclists, and to provide additional information on their legal obligations.</p> <p>PCS will continue to inform reserve users of their responsibilities through signage, website information, direct contact, social media etc. In addition, PCS will roll out additional signage throughout Canberra Nature Park in 2020–21 and investigate the capacity for increased compliance and enforcement by rangers in some reserves.</p>
	<i>Recreation — Climbing (10 comments in 6 submissions)</i>	



<i>Item</i>	<i>Comments</i>	<i>Response</i>
<b>44</b>	Prohibiting rock climbing in Canberra Nature Park is not justified.	After carefully considering the impacts of rock climbing and the limited locations suitable for climbing, the Plan has been revised; rock climbing is no longer prohibited. However, climbing is not permitted at Mt Ainslie Quarry and bouldering is not permitted in Black Mountain Nature Reserve.
	<i>Recreation — Cycling (15 comments in 11 submissions)</i>	
<b>45</b>	Mountain biking is causing significant damage because riders are going off-track and creating informal tracks instead of staying on the formed management trails.	<p>The section on cycling and mountain biking has been revised to emphasise the importance of cyclists staying on management trails and multi-use tracks.</p> <p>As part of the tracks and trails audit, an assessment of informal tracks will be undertaken to determine their suitability for either closure, maintenance or upgrade to meet Australian Standards.</p> <p>PCS will continue to inform cyclists of their responsibilities through signage, website information, direct contact, social media etc. In addition, PCS will roll out additional signage throughout Canberra Nature Park in 2020–21 and will investigate the capacity for increased compliance and enforcement by rangers in some reserves.</p>
<b>46</b>	Greater clarity in the track and trail nomenclature is needed	The Plan uses standard and agreed terms for tracks and trails. These terms are consistent with maps available within reserves and those that will be available on the EPSDD website.
<b>47</b>	Cycling should be permitted in grassland reserves.	Due to the sensitivity of grassland habitat and presence of critically endangered species, cycling is not permitted in many grassland reserves.

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<i>Recreation — Dogs (21 comments in 17 submissions)</i>	
<b>48</b>	Many dog owners are not complying with the requirement for dogs to be on leash and under control.	The Plan has been revised to include reference to the legal requirements under the Domestic Animals Act. This includes the requirement for dogs to be on leash, under the control of their carer, and for carers to hygienically dispose of dog droppings. The Plan now also requires that dogs are restricted to formal tracks or trails.
<b>49</b>	Some people do not adequately dispose of dog faeces.	PCS will continue to inform dog owners of their responsibilities through signage, website information, direct contact, social media etc. In addition, PCS will roll out additional signage throughout Canberra Nature Park in 2020–21 and will investigate the capacity for increased compliance and enforcement by rangers in some reserves.
<b>50</b>	There should be more restrictions on dog walking in Canberra Nature Park.	The Nature Conservation Act generally prohibits dogs in nature reserves. Allowing dogs into Canberra Nature Park is a continuation of past practice and is only permitted through an Activities Declaration specifying certain conditions such as a requirement that the dog be on a leash. The Plan now requires that dogs are restricted to formal tracks or trails.
<b>51</b>	There should be more opportunities for dog walking in Canberra Nature Park.	<p>Dog walking is recognised as a popular activity in Canberra Nature Park. However, as outlined in the Plan, dogs can have a significant impact on reserve values and allowing dog walking in additional reserves is not proposed. There are currently no plans to increase or reduce the number of reserves that permit dog access.</p> <p>However, if the presence of dogs is found to be having a significant impact on reserve values, the approval for dog walking in some locations may be reviewed.</p>

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<i>Recreation — Events (9 comments in 6 submissions)</i>	
<b>52</b>	Community events are not appropriate in Canberra Nature Park because of the impacts on natural values.	Comments noted. The Plan includes a section on booked group events that clarifies there are restrictions on some activities in Zone 1 Core Conservation areas and to avoid these sensitive areas. Larger events require consultation with PCS during the planning stages. Applications for events will be rigorously assessed and will only be permitted when there will be no adverse impacts on the natural or cultural values of reserves.
<b>53</b>	Larger events have the potential to adversely impact high conservation value areas e.g. Mulligans Flat Sanctuary.	The Plan has been revised to acknowledge that the special circumstances applying in the Mulligans Flat Sanctuary may require a different approach to recreation and other activities. The PCS, the Woodlands and Wetlands Trust and their research partners are currently developing a strategy for the Sanctuary. The EPSDD Environment Division is preparing a Conservation Action Plan for the Mulligans Flat Sanctuary.
	<i>Recreation — Horse riding (31 comments in 12 submissions)</i>	
<b>54</b>	Appendix 5 (Principles for horse riding in Canberra Nature Park) is unjustified and should be deleted.	Appendix 5; Horse Riding in Canberra Nature Park: A Report to Environment ACT (Landsberg 1999) was included in the draft plan as the basis for further discussions with the equestrian community. The relevant principles have been incorporated into best practice guidelines for horse riding. Following discussions with equestrians and clarification that it is not the intention of the PCS to prohibit endurance riding in Canberra Nature Park, the Appendix has been deleted.
<b>55</b>	Trialling additional horse- riding trails in	Comments noted. The potential for additional horse- riding opportunities is considered in the Plan and will be explored with relevant stakeholders. Additional trails will not be considered in

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	Canberra Nature Park is/is not supported.	<p>sensitive areas or where horses may adversely impact the natural and cultural values of reserves.</p> <p>Horses will continue to be restricted to management trails and designated equestrian trails.</p>
	Recreation — Permitted activities (6 comments in 4 submissions)	
<b>56</b>	Some recreational activities are not suitable for Canberra Nature Park.	<p>Comments noted. The Plan provides guidance for all existing recreational uses in Canberra Nature Park and restrictions are placed on some activities in sensitive areas. While the primary objective for management of nature reserves is nature conservation, the secondary statutory objective is to provide for public use of the area for recreation, education and research.</p> <p>The PCS Visitor Experience Strategy (in development) will provide a detailed outline of the ACT Government's policy and priorities for recreational use of all ACT parks and reserves, including future recreation and commercial opportunities.</p>
<b>57</b>	The Plan focuses almost entirely on conservation actions and fails to identify actions for other users, including recreation.	A significant number of actions in the Plan are related to recreation and nature-based experiences. The number of actions related to achieving conservation outcomes reflects the primary statutory objective for managing nature reserves, which is conservation of the natural environment.
	<u>Chapter 8 — Community Involvement</u>	

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<i>Community education (10 comments in 5 submissions)</i>	
<b>58</b>	Critical areas for education programs to increase community awareness include reserve values, threats to reserve values (from recreation, domestic animals, pest species etc.) and allowable activities.	<p>Comment noted. Chapter 8 of the Plan contains objectives and actions that relate to education programs and engaging the community.</p> <p>Educational topics suggested in submissions will be considered in the development of education programs.</p>
<b>59</b>	The Plan should mention the Woodland Learning Centre, currently under development, as a significant resource for education and interpretation.	The Plan has been updated to include information about the Woodland Learning Centre (in Chapter 8 and the reserve profile for Mulligans Flat).
	<i>Community involvement (18 comments in 11 submissions)</i>	
<b>60</b>	Continued recognition and support of the significant volunteer work and monitoring undertaken by community groups within Canberra	Comment noted. Additions have been made to several sections of the Plan to incorporate comments made by community groups. Many community and other organisations make a significant contribution to maintaining reserve values. PCS will continue to recognise and support these groups and their work within Canberra Nature Park.

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	Nature Park is important.	
<b>61</b>	Additional opportunities should be taken to engage young people in the reserves (e.g. nature play and junior ranger programs).	<p>There are several actions in Chapter 8 of the Plan that aim to increase the engagement of school-aged children with Canberra Nature Park reserves.</p> <p>Topics suggested in submissions will be considered in the development of programs to engage young people.</p>
<b>62</b>	Increased resourcing for PCS staff to engage with the community is supported.	<p>Comments noted. Resourcing is beyond the scope of the Plan. Resource allocation for engagement with the community will continue to be prioritised by PCS under this Plan.</p> <p>In 2019–2020 an additional ranger was allocated to support the ParkCare Program. Further resourcing will be subject to the ACT Government budget cycle.</p>
<b>63</b>	Improving partnerships between PCS staff and organised community groups to undertake monitoring and management is encouraged.	Comments noted. PCS recognises the importance of partnerships and continuing engagement with groups that undertake monitoring and management within Canberra Nature Park. Several actions in the Plan aim to ensure the development and maintenance of strong partnerships with community and other interested groups.
	<i>Cross tenure management (12 comments in 8 submissions)</i>	
<b>64</b>	Impacts from urban areas on Canberra Nature Park are significant,	Changes have been made to Section 8.3 Neighbours to emphasise the importance of working collaboratively with neighbours, including institutional neighbours and government agencies, to reduce impacts on reserve values. The Plan notes

<i>Item</i>	<i>Comments</i>	<i>Response</i>
	cooperation with urban land managers is essential and relevant actions should be increased from medium to high priority.	the impacts from urbanisation on Canberra Nature Park and the importance of working in collaboration with urban land managers on a range of issues. The priority for actions relating to working in partnership with adjacent land managers and the community in weed and pest animal management has been revised to 'high' and 'ongoing'.
<b>65</b>	The Plan does not adequately identify relevant neighbouring land managers and ways that PCS can work with neighbours to improve conservation outcomes and mitigate threats to natural values.	Additional information on relevant neighbouring land managers has been added to Section 8.3. Many actions relate to PCS working in collaboration with neighbours to improve conservation outcomes and mitigate threats. These include undertaking biosecurity activities, pest animal and weed management, traditional land management and reducing the impact of urbanisation on reserves.
<b>66</b>	There is a need to coordinate some management actions with adjoining landholders.	See above.
	<i>Research and monitoring (12 comments in 7 submissions)</i>	
<b>67</b>	Increased opportunities for research and monitoring and	Comment noted. Additional information on research and monitoring has been added to Chapter 9.

<i>Item</i>	<i>Comments</i>	<i>Response</i>
	evidence-based decision making is strongly supported.  Research and monitoring could be expanded.	Monitoring is an integral part of evaluating the effectiveness of management actions in achieving nature conservation objectives. The CEMP is an overarching ecosystem condition monitoring framework for the ACT conservation estate. The CEMP aims to create a coordinated, systematic, and robust biodiversity monitoring program that will allow us to detect changes in ecosystem condition within reserves, evaluate the effectiveness of management actions in achieving conservation outcomes, and provide evidence to support land management decisions. A key component of the program is to develop target condition and monitoring plans for the identified ecosystem units within the ACT reserve system. Further information can be found at: <a href="https://www.environment.act.gov.au/data/assets/pdf_file/0004/1059241/Conservation-effectiveness-monitoring-program.pdf">https://www.environment.act.gov.au/data/assets/pdf_file/0004/1059241/Conservation-effectiveness-monitoring-program.pdf</a>
<b>68</b>	There is insufficient funding for research and monitoring.	Comments noted. Funding for research and monitoring is subject to the ACT Government budget cycle.
	<u>General Comments</u>	
	<i>Editing (72 comments in 16 submissions)</i>	
<b>69</b>	Several edits (including formatting, changing/ adding images and adding additional information) should be made to clarify the meaning of some statements.	Numerous edits have been made in response to these submissions.



<b>Item</b>	<b>Comments</b>	<b>Response</b>
	<i>Editing — Technical detail (62 comments in 17 submissions)</i>	
<b>70</b>	Some text requires fact checking and the consideration of additional information.	Several technical details have been reviewed and revised to improve accuracy. In some cases, additional information has been added to clarify specific sections.
	<i>Management prioritisation (15 comments in 10 submissions)</i>	
<b>71</b>	It is important that nature conservation has primacy over recreation.	Various sections in the Plan have been revised to clarify that the primary management objective for Canberra Nature Park is conservation of the natural environment.
	<i>Operations — Location specific (17 comments in 16 submissions)</i>	
<b>72</b>	Management actions should be undertaken at specific reserves including rubbish removal, reducing the number of informal tracks and trails, weed removal, reducing pressure from recreational use causing degradation, introducing security	<p>Many of these comments related to compliance issues and day-to-day maintenance of the reserves. Where appropriate, suggested management actions specific to individual reserves have been forwarded to the PCS Director Urban Reserves for incorporation into the operational works program. All works are subject to the availability of resources.</p> <p>Some suggested management actions, such as installing rubbish bins for dog faeces, are not considered appropriate and are not included in the Plan.</p>

<b>Item</b>	<b>Comments</b>	<b>Response</b>
	measures, dog faeces disposal, improved fencing and the poor condition of some reserves due to drought and overgrazing by kangaroos and rabbits.	
	<i>Reserve summaries (4 comments in 3 submissions)</i>	
<b>73</b>	More detail should be provided on management actions for individual reserves and linkages shown upwards to the goals and objectives of the Plan and downwards to operational plans for individual reserves.	Comments noted. Additional detail on management actions for individual reserves will be provided in reserve implementation plans and operations plans. The goals and objectives of the Plan are considered in preparing these subsequent documents.
	<i>Resourcing — Compliance (5 comments in 5 submissions)</i>	
<b>74</b>	Increased investment is required in enforcing compliance (e.g. camping, dogs, appropriate use of	Comments noted. Additional resourcing is subject to the ACT budget cycle and government priorities. Additional signage will be rolled out across Canberra Nature Park in 2020–21 and PCS will investigate the capacity for increased compliance and enforcement by rangers in 2020–21. PCS will also continue to

<i><b>Item</b></i>	<i><b>Comments</b></i>	<i><b>Response</b></i>
	tracks and littering) including increasing the numbers of rangers on-the-ground to enforce compliance and undertake community education.	inform reserve users of their responsibilities through signage, website information, direct contact, social media etc.
	<i>Resourcing — Funding (12 comments in 9 submissions)</i>	
<b>75</b>	Adequate funding is required if the objectives of the Plan are to be achieved.	Comments noted. Funding is subject to the ACT budget cycle and government priorities.

## 4 COMMITTEE COMMENT

- 4.1 Consideration of the information presented above in Tables 1 and 2 showed us that the Draft Plan 2020 had for the most part been amended on a small scale—often at the level of the sentence or phrase. This allowed the consultation process to be presented as responsive to the concerns it received. However, there were some concerns to which the process did not respond, or did not respond in any significant way.
- 4.2 These included concerns about:
- identified anomalies, on site, in the proposed two-zone framework;
  - open questions about whether adequate resources were, and would be, applied to implement the Plan, particularly for compliance and weed control, but also for community education and engagement and management of the CNP across the board;
  - unresolved questions about whether the Plan placed a clear priority in nature conservation as the prime management objective for the CNP;
  - whether a rationale was provided for additions to the CNP, or the change from a four-zone set out in the 1999 Reserve Management Plan, currently in force, to the two-zone framework proposed in the 2020 Draft Plan; and
  - whether edge effects had been adequately addressed;
  - whether there had been an attempt to ameliorate effects of high use by supporting activities outside of the CNP; and that
  - in its present form, the Draft Plan had many objectives, but did not provide clear and measurable targets, making it difficult to assess what was being achieved through the Plan.
- 4.3 In our view, all of these are significant gaps in the Plan process, but we consider concerns about resourcing, compliance, and measurability for the Plan particularly important. In considering the Plan, we reflected on three themes relevant to these factors, including: the form of the Plan; the practicability of achieving the objectives set out in the Plan; and the degree to which the Plan, and its Consultation Report, accurately reflected and responded to public submissions.

### THE FORM OF THE PLAN

- 4.4 We considered the Plan in terms of it being, as regulation, a legislative instrument that would guide the management of the Canberra Nature Park, potentially for some time into the future. With this in mind, we thought about whether the Plan set out objectives clearly, and the degree to which it would support a culture of accountability: that is, during its time of

operation the extent to which the Plan would support assessments of whether its goals and objectives were being met. We considered this important not only for external oversight of the Plan, but also for the effective operation of the ACT Parks and Conservation Service as the custodian of the Plan.

- 4.5 In reflecting on the Plan in these terms, we took into consideration the size or length of the Plan, whether it was phrased as measurable propositions, and the degree to which the various goals and objectives, which are arranged in a hierarchy, could be seen to articulate with one another effectively.
- 4.6 We approached these questions in the belief that effective legislative regulation is concise and accurate in its presentation and language, and clearly defines when its requirements are or are not being met.
- 4.7 With this in mind we thought that the Plan was too long, contained too many actions, and did not provide sufficient measurable propositions to do the work usually entrusted to legislative regulation. From a formal point of view, the Plan in its present state combines normative statements (what should be) with descriptive statements (what is) in an unconsidered way, which limits its effectiveness as a statement of measurable propositions. All of these things reduce the precision of the Plan, and the degree to which it can serve a useful purpose in guiding the actions of the custodian and holding it to account.
- 4.8 We thought an amended, shorter, Plan would be a better support for these important functions. The Plan itself would benefit from fewer actions with a tighter degree of articulation between them, and a focus on creating measurable propositions. This would be enhanced by reducing the diversity of types of written material included in the Plan. Current descriptions of ecosystems and habitats, including for each reserve, should be taken out and included in a separate companion volume that would, over time, provide a framework for baselining, subject to further research, the ecological and conservation values of each reserve and the CNP as a whole. We think that this would result in a Reserve Management Plan that would reflect, more appropriately, its status as regulation in the ACT statute book.
- 4.9 We regard Appendix 3 of the current Draft Plan 2020, 'IUCN [International Union for Conservation of Nature] Category IV Management Objectives and Canberra Nature Park',<sup>270</sup> as important because it embodies many of the things we would like to see in a final Reserve Management Plan. It is concise, measurable and firmly linked to—and expressive of—a framework that has been given effect in ACT statute. For this reason, we think that Appendix 3 should be removed from the appendices and given pride of place as the centre-piece of the

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<sup>270</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, Appendix 3, 'IUCN Category IV Management Objectives and Canberra Nature Park', at pp.234-240.

Reserve Management Plan, followed by specific and measurable actions stemming from it to make up the rest of the Plan.

## Recommendation 1

### **4.10 The Committee recommends that the Canberra Nature Park Draft Reserve Management Plan be amended so that it will:**

- set out clear, concise, and measurable propositions throughout;
- provide clear articulations across goals and actions; and
- include reserve plans, comprising measurable actions and goals, in the body of the Plan.

## PRACTICABILITY OF ACHIEVING ACTIONS

4.11 As noted above, the Canberra Nature Park at present comprises 39 individual reserves, amounting to 11,400 hectares in coverage.<sup>271</sup> We thought that the Plan did not successfully provide a context for its actions or objectives by describing current status, conditions or dilemmas in relation to its component reserves. In promulgating 95 actions the Plan was in danger of providing a framework that could not be put into action, and under which the success or failure of work to progress those actions could not be established.

4.12 Our first-hand awareness of the high prevalence of invasive flora in the Canberra Nature Park, seemingly at odds to the picture presented in the Plan, helped to increase our concern about this aspect of the current Plan, and the degree to which the custodian, ACT Parks and Conservation Service, is funded sufficiently to prosecute all of the actions set out in the Plan. Also, we were not able to identify the establishment (that is, the number of dedicated staff) or the financial resource allocated by government for the for maintenance of the Canberra Nature Park, in Budget Papers or Annual Reports.<sup>272</sup> If there are not sufficient resources for the actions set out, this Plan would set the scene for a period of lapsing compliance in which no-

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<sup>271</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, pp.2, 3.

<sup>272</sup> See ACT Government, Budget 2020-21, *Budget Statements E: Environment, Planning and Sustainable Development Directorate*, City Renewal Authority, Suburban Land Agency, viewed 22 June 2021, available at: <https://apps.treasury.act.gov.au/data/assets/pdf/0008/1698938/2020-21-Budget-Statements-E.pdf> and Environment, Planning and Sustainable Development Directorate, *Annual Report 2019-20*, viewed 22 June 2021, available at: <https://www.planning.act.gov.au/data/assets/pdf/0008/1676942/2019-20-EPsDD-Annual-Report.pdf>

one would expect the custodian to meet the objectives set out in the governing document for the Canberra Nature Park.

- 4.13 This would be a most unfortunate outcome. In the listening report, funding questions were addressed with the following: “Funding is subject to the ACT budget cycle and government priorities”. Given the breadth of actions required in order to competently manage and maintain Canberra Nature Park, particularly in a changing climate, the Committee recommends ongoing funding for the management of Canberra Nature Park. The Committee also recommends that irrespective of whether funding is subject to the budget cycle and government priorities, work be done and integrated in to the, an estimation of the resources required in order to fulfil set priorities.

## Recommendation 2

- 4.14 The Committee recommends that the ACT Parks and Conservation Service include in the draft reserve management plan estimated staffing and resourcing requirements in order to achieve the outcomes set out in the draft reserve management plan, and the ACT Government include in Budget Papers and Annual Reports appropriations and numbers of staff dedicated to maintaining Canberra Nature Park.**

## RESPONSE TO PUBLIC SUBMISSIONS

- 4.15 In considering the degree to which public submissions were accurately reflected in the Consultation Report and in the Plan itself, we thought about two things. One was simply whether the Consultation Report and Plan had managed to reflect, accurately, public concerns and sentiment. The second was whether the most significant of these concerns had been addressed in terms of the policy and actions outlined in the Plan.
- 4.16 Regarding the first question — on whether concerns and sentiment were accurately reflected — we found that there were grounds for concern. In fact, important concerns raised in a number of submissions were not effectively acknowledged in the Consultation Report, including a number of comments critical of the Plan for a lack of detail on management actions; concerns about zoning; the categorisation of dingoes as wild dogs and / or pests; and fire management.
- 4.17 Regarding the second question — on whether those concerns actually resulted in substantive changes to the Plan — again there were grounds for doubt. The Plan introduces a concept of zoning which divides the Nature Park into ‘Zone 1: Core conservation’ and ‘Zone 2: Conservation and landscape (general protection)’. These are defined, respectively, as areas ‘with sensitive values most likely to be impacted by physical disturbance’ (Zone 1), and areas ‘where the conservation values are less sensitive to disturbance and less likely to be impacted’,

which ‘may have a history of greater modification or disturbance by urban infrastructure, generally have lower species diversity, and do not contain large areas of sensitive threatened species habitat’ (Zone 2).<sup>273</sup>

- 4.18 We understand this to be a mechanism for triaging or rationing of care for reserves included in the Nature Park. It was reasonable to anticipate that this would be controversial and attract comment, which it did in ‘20 comments in 8 submissions’, according to the Plan.<sup>274</sup> However, only two of these were reflected in and responded to in the Consultation Report, and neither of the answers appeared to reflect a genuine response to matters raised. There were also comments by significant non-government organisations about zoning that were not reflected. This was an important, substantive line of comment, which did not receive a commensurate response in either the Consultation Report or the Plan, and this seems to undermine the objective of the consultation process for the Plan.
- 4.19 Reflecting on the two questions, then, we think that there are important questions about the consultation report process to both reflect what has been provided through the consultation process, and to engage with it in a substantive way. The zoning concept is probably the most significant new development in this Plan, and questions about it could have been ventilated and dealt with more effectively.

### Recommendation 3

- 4.20 The Committee recommends that consultation reports for this and future management plans present all comment provided during consultation phase of the draft management plan process and that the current consultation report for the draft reserve management plan be amended to reflect comments provided during the consultation phase.**

## OTHER FACTORS

- 4.21 We are aware that there have been significant bushfires in the ACT since the initial consultation draft of the Plan was released in 2019. The ACT Government’s response to the Royal Commission into National Natural Disaster Arrangements described them as follows:

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<sup>273</sup> *Canberra Nature Park Draft Reserve Management Plan 2020*, p.78.

<sup>274</sup> *Canberra Nature Park Consultation Report 2020*, p.18.



On 22 January 2020, a fire ignited in the Pialligo Redwood Park that burnt 424 hectares of farmland and threatened structures. Five days later on 27 January, a bushfire ignited in the Orroral Valley in Namadgi National Park. This bushfire burned over 88,000 hectares and caused significant damage to the environmental, cultural and heritage assets of the park. It also caused losses to valuable farmland and farming assets of the ACT's rural landowners. It was the first time a State of Emergency was declared in the ACT under the Emergencies Act 2004.<sup>275</sup>

- 4.22 We consider that the time elapsed since the release of the Plan for consultation, and since the advent of the fires in early 2020, presents an opportunity for the Plan to be amended to reflect, more completely, fire risk and the best contemporary thinking on fire management.
- 4.23 We also note that since the release of the Plan for consultation the ACT and the wider world have experienced the very significant unanticipated effect of the COVID-19 pandemic. This too could inform a further, amended, version of the Plan which is likely to remain in force for some time, based on recent experience.

## **Recommendation 4**

- 4.24 The Committee recommends that the ACT Parks and Conservation Service continually monitor the Reserve Management Plan for Canberra Nature Park, taking into account significant bushfire and pandemic events which have occurred since the 2019 release of the Plan for Consultation.**

Chair

Report adopted 19 July 2021

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<sup>275</sup> ACT Government, *Response to the Royal Commission into National Natural Disaster Arrangements*, p.1, viewed 22 June 2021, available at: <https://www.cmtedd.act.gov.au/data/assets/pdf/0017/1730420/ACT-Government-Response-to-the-Royal-Commission-into-National-Natural-Disaster-Arrangements.pdf>



## APPENDIX A – PAPERS THE MINISTER PROVIDED TO THE COMMITTEE

The Minister provided the following papers to the Committee when he referred the Draft Reserve Management Plan 2020 on 16 March 2021:

- A letter from Mick Gentleman MLA, Minister for Planning and Land Management, of 20 January 2021, referring the Canberra Nature Park Draft Reserve Management Plan to the Committee
- An attachment, Attachment A, to the letter: the Canberra Nature Park Draft Reserve Management Plan
- An attachment, Attachment B, to the letter: the Consultation Report for the Canberra Nature Park Draft Reserve Management Plan.

Later, at the Committee's request, the Minister provided, on 25 May 2021:

- Public submissions regarding the Canberra Nature Park Draft Reserve Management Plan provided during the consultation process.



## APPENDIX B – CHANGES FROM THE 2019 TO THE 2020 DRAFT PLAN

This table shows selected changes from the 2019 to the 2020 Draft Plan.

<i>Item</i>	<i>Change</i>
1	Change from listing of different first nations people in the Canberra area by name at p.vi to indication of Ngunnawal people 'and neighbouring language and clan groups' on same page
2	Passage and graphic re the 'ACT Wellbeing Framework' added at p.2, and linkage to Wellbeing Framework (2020, p.3)
3	Change from indication of 37 nature reserves at p.2 to 39 (2020, p.3)
4	Additional material on extension of CNP at p.3: 'Several of the reserves have been extended since they were first established through the addition of environmental offset areas.' (2020, p.3.)
5	Additional material on reserve management plans (2020, p.3.)
6	'The incorporation of any new area of land into the reserve system is achieved by the addition of a public land nature reserve overlay through a variation to the Territory Plan. Some areas may be added as a result of being set aside for conservation as environmental offsets ... ' (2020, p.3.)
7	Franklin Grasslands inserted into Table 1.1, (2020, p.5.), also entry for 'Nadjung Mada (provisional name)'
8	Column entitled 'Offset area' added to Table 1.1, (2020, p.5.) (entries are either [tick] or 'Part')
9	Additional reference to 'significant geological features' added to table at (2020, p.6.)

<i>Item</i>	<i>Change</i>
10	replacement of 'Aboriginal' with 'Ngunnawal', same table (2020, p.6.), and reference to other different first nations peoples by name removed (2020, p.6.)
11	Added reference to 'predator-free Woodland Sanctuary' at Mulligans Flat (2020, p.6.)
12	Goal placed in lower position in table - 'Canberra Nature Park makes a significant contribution to ... the health and wellbeing of the community' (2020, p.7.)
13	'Traditional Custodians' replaced with 'Ngunnawal Traditional Custodians' (2020, p.7.) - and see also (2020, p.9.)
14	Added text: 'Actions included in the reserve summary profiles will be incorporated into the implementation and operations plans.' (2020, p.11.)
15	Added text: 'Areas within Canberra Nature Park that have been included in the reserve system as a result of environmental offsets have their own offset management plans, which can be accessed via the ACT Offsets Register ... ' (2020, p.14.)
16	Added text: '1.11 Review of management responsibilities and boundary adjustments Several Canberra Nature Park reserves have been extended since they were first established and not all Territory Plan boundaries align with logical on-ground boundaries ... ' (2020, p.15.)
17	Text deleted: Canberra Nature Park woodlands 'cover around 6500 hectares' (2020, p.18.)
18	Yellow Box indicated as 'critically endangered in the ACT' (2020, p.18.)
19	Text deleted: "Canberra Nature Park woodland remnants have a particularly diverse native understorey, with over 200 woodland plant species recorded in Mulligans Flat, Goorooyarroo, Mount Majura, Mount Ainslie, Red Hill, Farrer Ridge, Tuggeranong Hill and Rob Roy." (2020, p.19.)

<i>Item</i>	<i>Change</i>
20	Text deleted: Snow Gun “is listed as an endangered ecological community in NSW ... “ and Mount Painter removed as habitat (2020, p.19.)
21	Text inserted: ‘Achievements include: • over 900 ha of revegetation, including 28,548 tube stocks planted and 101 km of direct seeding • enhancement and protection of 844 ha of remnant woodland (including the distribution of 4,415 tonnes of coarse woody debris) • invasive species control over an area of 4,494 ha • feral ... ‘ (2020, p.20.)
22	removal of reference to dingos as larger animals scarce close to the city (2020, p.28.)
23	Text inserted: ‘Improving grassland habitat through [reinstatement] of surface rock In the ACT it is estimated that 95% of pre-European Natural Temperate Grassland has been destroyed or significantly altered and as part of this process extensive areas of rock have either been removed or displaced. Many fauna species use rocks ...’ (2020, p.30.)
24	Text deleted: “6500 hectares of” woodland within the CNP (2020, p.31.)
25	Text inserted: ‘A key goal of the ACT Government’s Living Infrastructure Plan (ACT Government 2019c) is to progress toward providing Canberra’s urban footprint with the equivalent benefits of 30% tree canopy cover and 30% permeable surfaces. Action 9 of the Living Infrastructure Plan is to develop an Urban Forest Strategy—a strategic ... ‘ (2020, p.34.)
26	Text inserted: ‘Management of the grassy layer in Canberra Nature Park reserves is conducted in accordance with the ACT Native Grassland and Lowland Woodland Conservation Strategies and informed by the Conservation Effectiveness Monitoring Program (CEMP), which incorporates annual herbage mass monitoring ...’ (2020, p.39.)

<i>Item</i>	<i>Change</i>
27	Text replaced:  [Old]: "Parks and Conservation Service"  [New]: "Environment, Planning and Sustainable Development Directorate" ... 'is working toward the integration of traditional ecological knowledge, including traditional burning practices, into the management of Canberra Nature Park' (2020, p.39.)
28	Text replaced: 'Aboriginal' with 'Ngunnawal' (2020, p.40.)
29	Text inserted: addition of "evidence-based" for guidelines for fire fuel management activities (2020, p.42.)
30	Text inserted: "Manual removal of weeds is undertaken by many ParkCare groups." (2020, p.43.)
31	Text inserted: "Biosecurity:" prepended to heading 2.5.5, 'pest animals', (2020, p.43.)
32	Text replaced: [Old]: "They are a potential risk to livestock, are urban scavengers, prey on pets and are a reservoir for canine diseases."  [New]: "DNA evidence indicates that wild dogs in the ACT are essentially dingoes with a small proportion of domestic dog genes. However, as pure dingoes cannot be distinguished from part dingoes in the field, they are managed under the ACT Pest Animal Strategy as a single entity (i.e. as wild dogs). The ACT Government aims to maintain viable populations of wild dogs in conservation areas but they are a ..." (2020, p.44.)
33	Text replaced: [Old]: "ended." [New]: "ended but remains at risk due to factors including increased temperatures as a result of climate change." (2020, p.43.)
34	Bullet-points on 'policies' added at top of ss 2.6, including statement as to prioritising certain policies or lines of activity (2020, p.49.)
35	Under 'Actions', 'Prepare' changed to 'Prepare and promote' (2020, p.49.)



<i>Item</i>	<i>Change</i>
36	Text replaced: [Old]: “landscape.” [New]: “landscape – ensure consideration of connectivity and linkages in the implementation of the Urban Forest Strategy.” - reflects submission comments regarding ‘connectivity’ (2020, p.50.)
37	Text replaced: [Old]: “grassy ecosystems.” [New]: “grassland, woodland and forest ecosystems.” (2020, p.50.)
38	Text inserted: “Ngunnawal Traditional Custodians” instead of ‘Plan and implement cultural burns with Traditional Custodians’ (2020, p.50.)
39	Text replaced: [Old]: “managers” [New]: “managers, volunteer groups, citizen scientists” (2020, p.51.)
40	Text inserted: “species and habitat” instead of restoring ‘diversity’ in ‘ecological communities’ (2020, p.52.)
41	Text inserted: ‘Rocks are the foundations of the earth’s landscapes. Their physical and chemical make-up and their interaction with air and water, together with movements in the Earth’s crust, affect the form of the landscape and the composition of the soils. These in turn are crucial factors in the nature and distribution of plant and animal communities. An understanding of geological and landform features is key to understanding the ecological and human history of any area and significant geological and geomorphological sites warrant protection.’ - increases salience of geological features and values (2020, p.54.)
42	Text inserted: “The ACT Soil Landscapes dataset maps 55 soil landscape units across the ACT, based on a report by Cook et al. (2019). Figure 3.1 shows the soil landscapes of Canberra Nature Park. The data set, which includes links to full soil landscape reports with characteristics for each unit, is accessible at: <a href="http://app.actmapi.act.gov.au/actmapi/index.html?viewer=shl#:~:text=The%20ACT%20Soil%20Landscapes%20dataset,map%20units%20have%20been%20described.">http://app.actmapi.act.gov.au/actmapi/index.html?viewer=shl#:~:text=The%20ACT%20Soil%20Landscapes%20dataset,map%20units%20have%20been%20described.</a> ”
43	Text deleted: “including the Ngambri, Ngarigo, Wolgalu, Gundungurra, Yuin and Wiradjuri people” (2019, p.54; 2020, p.62.)

<i>Item</i>	<i>Change</i>
44	<p>Text replaced: [Old]: “for cultural and social purposes. These uses could include ceremonies, gatherings, fishing, cooking, healing, resource collection and knowledge transference. The Parks and Conservation Service supports access to Country and use of land and reserves by the Aboriginal”</p> <p>[New]: “for cultural and social purposes that are culturally appropriate. The development of a cultural resource management plan in partnership with the Ngunnawal people will identify culturally appropriate processes for cultural and social practices on Ngunnawal Country. These uses could include ceremonies, gatherings, fishing, cooking, healing and resource collection. The Environment Planning and Sustainable Development Directorate supports culturally appropriate access to Country and use of land and reserves by the Aboriginal and Torres Strait Islander” (2020, p.64.)</p>
45	<p>Text replaced: [Old]: “The ACT Parks and Conservation Service Aboriginal rangers Parks and Conservation Service”</p> <p>[New]: “The Dhawura Ngunnawal Caring for Country Committee The _Dhawura Ngunnawal Caring for Country Committee_ (emphasis added) (for the purpose of brevity Dhawura Ngunnawal Committee) will engage, connect and work with the _Environment, Planning and Sustainable Development Directorate (EPSDD)_ (emphasis added) to identify and implement cultural understanding within the Directorate and to provide guidance, direction and decisions to the Environment Division on environmental and land management matters including land, fire, air and water, to better manage Ngunnawal Country together on EPSDD managed lands. The EPSDD manages 77% of Ngunnawal Country and is working with the Dhawura Ngunnawal Committee to improve Ngunnawal engagement in the management of Country. The Directorate will work with the committee to formalise a co-management agreement for EPSDD managed lands and implement other actions in line with the July 2020 National Agreement on Closing the Gap.” (2020, p.64.)</p>

<i>Item</i>	<i>Change</i>
46	<p>Text replaced: [Old]: “organisation. They come together as the Murumbung Yurung Murra Rangers to better involve Traditional Custodians in identifying the traditional uses, values and connections to fire, land and water and to capture the contemporary aspirations for management of the cultural landscape. The Murumbung Yurung Murra Rangers also provide invaluable peer support, mentoring and advocacy within the Parks and Conservation Service and support the Representative Aboriginal Organisations and Traditional Custodians in the protection and interpretation of heritage sites for the enrichment of future generations.”</p> <p>[New]: “Environment, Planning and Sustainable Development Directorate and come together as the Murumbung Yurung Murra Network for the purpose of peer support, mentoring and advocacy for Aboriginal and Torres Strait Islander staff within the directorate. Members of the network also participate in the delivery of cultural activities to assist with educating EPSDD staff and the broader community on the Aboriginal culture of the ACT.” (2020, p.64.)</p>
47	Changes at ss 4.6, ‘Cultural water flows’ (2020, p.65.)
48	<p>Text inserted: “ACT’s surface water and groundwater resource plans received accreditation by the Commonwealth Government in June 2020. The Water Resource Plans aim to support and protect Aboriginal objectives, values and uses identified through water resource planning engagement activities. This will be achieved through a fit-for-purpose approach via the ACT Water Strategy, the ACT Environmental Flow Guidelines and associated rules that protect flows, and a number of land and catchment management plans.” (2020, p.65.)</p>
49	Text replaced: [Old]: “Aboriginal” [New]: “Ngunnawal” (2020, p.66.)
50	Text replaced: [Old]: “more robust” [New]: “less sensitive” in relation to zoning (i.e., re Zone 2); also added: ‘and to outside of reserves’ (2020, p.78.)
51	Text inserted: Existing: May be redesigned and constructed to improved standards utilising lowest impact methods.” (this entry for both zones) (2020, p.81.)

<i>Item</i>	<i>Change</i>
52	Text replaced: [Old]: “Parks and Conservation Service” [New]: “EPSDD” ‘... supports the Healthy Parks Healthy People approach ...’ (2020, p.84.)
53	Text replaced: [Old]: “pathogens.” [New]: “pathogens; and the illegal disposal of waste, including dog faeces.” (2020, p.85.)
54	Text inserted: re ‘restricting’ walking ... to “tracks and trails in” (2020, p.85.)
55	Text replaced: re 2020 Tourism Strategy - [Old]: “The strategy includes a number of thematic plans including ‘Adventure: Try something new i.e. mountain biking, bush walking’. Canberra’s natural areas are important to this theme” [New]: “Canberra’s natural areas are important to the ‘Outdoors and Adventure’ key experience pillar identified in the Strategy” (2020, p.85.)
56	Text inserted: “Management trails are also commonly used for cycling and other recreational access/activities.” (may be considered a limited response to submitter comment re trails) (2020, p.85.)
57	Text inserted: reference to ACT Strategic Bushfire Management Plan and URL for Plan (2020, p.87.)
58	Text replaced: [Old]: “cycleway” [New]: “active travel” (2020, p.87.)
59	Text inserted: “Walking off track also increases the risk of the introduction of weed species or accidental transport of pathogens.” (2020, p.88.)
60	Text inserted: “and rogaining (2020, pp.88, 89.)
61	Text inserted: Box 2: Orienteering and rogaining - best practice (2020, p.90.)
62	Text replaced: [Old]: “leash.” [New]: “leash and on a formal track or trail. Penalties apply for breaches of these conditions.” (2020, p.90.)

<i>Item</i>	<i>Change</i>
63	Text inserted: “The Domestic Animals Act requires: • dogs in public places to be on a leash and under the control of the carer • the carer of a dog in a public place to carry equipment suitable for the hygienic disposal of faeces dropped by the dog • the carer of a dog in a public place to hygienically dispose of any faeces dropped by the dog.” (2020, p.90.) and see also similar changes at (2020, pp.91, 92.)
64	Text inserted: “Reserve users walking dogs should avoid the eastern areas of Mt Ainslie during the bird breeding season.” (2020, p.91.)
65	Text replaced: [Old]: “Horses are prohibited in reserves unless an Activities Declaration under the Nature Conservation Act indicates that horse riding is permitted on identified trails. Table 7.1 identifies Canberra Nature Park reserves where horse riding is permitted.”  [New]: “It is an offence under the Nature Conservation Act for a person to take a horse into a reserve, unless there is an Activities Declaration (see Glossary) in place which declares horse riding to be a restricted activity, and the person is complying with the directions and requirements stated in the declaration. Activities Declarations that permit horse riding on identified trails are in place for several Canberra Nature Park Reserves, listed in Table 7.1.” (2020, p.92.)
66	Text replaced: [Old]: “Horse riding in Canberra Nature Park will continue to be managed under the principles and policies set out in Appendix 5 of Horse Riding in Canberra Nature Park (Environment ACT 1999).”  [New]: “Other horse riding areas outside the ACT reserve system include Stromlo Forest Park, Majura Pines, Isaacs Pines, the National Arboretum and sections of the Bicentennial Trail.” (2020, p.93.)
67	Appendix 5 re horse-riding - removed
68	Text inserted: “Restricting cycling to management trails and multi-use tracks helps to limit environmental impacts, which can include damage to vegetation, soil compaction and erosion, introduction of weed species, and accidental transport of pathogens. This restriction also helps minimise conflicts with other users and reduces risks to the riders.” (2020, p.93.)

<i>Item</i>	<i>Change</i>
69	<p>Text replaced: [Old]: “Abseiling, rock climbing and bouldering In Canberra Nature Park reserves where cliffs exist, abseiling and rock climbing will not be permitted. Bouldering is permitted but should be avoided in Zone 1 areas.”</p> <p>[New]: “Rock climbing, abseiling and bouldering There are very few, if any, areas with potential for climbing or abseiling in Canberra Nature Park, with the exception of Mt Ainslie quarry, where these activities are not permitted. Bouldering is permitted in Canberra Nature Park other than in Black Mountain Nature Reserve, where it is not permitted. Reserve visitors participating in bouldering activities in Canberra Nature Park should follow best practice outlined in Box 7 and take particular care to avoid impacts on values in Zone 1 areas. Insertion of bolts or other fixtures is not permitted.</p> <p>Box 7: Bouldering — best practice • Do not create informal tracks or damage vegetation. • Do not move rocks or fallen branches • Do not disturb plants and animals • Keep group sizes small • Be considerate of other users • Take care of vegetation when placing mats for protection • Brush any chalk off the rock with a soft bristled brush when you are finished • Carry out all waste • Respect regulations and closures.” (may be considered to respond to submitter comments) (2020, p.96.)</p>
70	<p>Text inserted: re ss 7.5, ‘Booked group events’ - “Events will only be approved if there is an identifiable, accountable and appropriately insured organiser (whether an individual, group or association). Organisers must provide the ACT Government with an identified area of operation and a defined timeframe for the event. Once approved, organisers must ensure all events are run in accordance with any approval conditions.” (2020, p.98.)</p>
71	<p>Text replaced: re. ss 7.7 ‘New recreational activities’ - [Old]: “high-impact activities elsewhere” [New]: “the activity elsewhere,” (2020, p.99.)</p>
72	<p>Text replaced: re. ss 7.11 ‘Prohibited activities’ - [Old]: “rubbish and littering.” [New]: “waste • littering. Penalties may apply.” (2020, p.101.)</p>
73	<p>Text inserted: re. ss 7.12 ‘Nature-based experiences: management policies, objective and actions’ - “• Bins will not be provided in Canberra Nature Park nature reserves and visitors are required to remove all waste, including dog faeces.” (may be considered to respond to submitter comments) (2020, p.102.)</p>

<i>Item</i>	<i>Change</i>
74	Text replaced: ss 7.12 - [Old]: “requirement.” [New]: “requirement and restricting dogs to formal tracks and trails.” (2020, p.102.)
75	Text replaced: [Old]: “52 Review Horse Riding in Canberra Nature Park: Management Principles and Policies to ensure it incorporates and reflects current research. 53 Trial the provision of additional horse riding access to defined trails in a small number of reserves. 54”  [New]: “57 Trial the provision of additional horse riding access to defined trails in a small number of reserves.” (2020, p.102.)
76	Text replaced: ss 8.2.2: [Old]: “Aboriginal and Torres Strait Islander groups” [New]: “The Ngunnawal community” (2020, p.109.)
77	‘Aboriginal’ replaced with ‘Ngunnawal’ in following text in section (2020, p.109.)
78	Text replaced: [Old]: “also supports volunteer activities through the Friends of Mulligans Flat.”  [New]: “fosters community participation in numerous ways, including through involving volunteers in tour guiding, provision of management advice, citizen science, historical research and documentation, support of experimental work and monitoring. The Trust’s ecological and outreach work provides a variety of volunteering opportunities for members of the Friends of Mulligans Flat ParkCare group. Additional opportunities will arise with the opening in late 2021 of a new Woodland Learning Centre at Throsby as a major focus for environmental education in Canberra.” (2020, p.109.)
79	Text replaced: under ss 8.3: [Old]: “objectives; for example, by preventing spread of weeds, controlling dogs and cats, not dumping”  [New]: “objectives and dealing with issues that cross tenures; for example, managing weeds and pests, controlling domestic animals, preventing the dumping of” (2020, p.110.)
80	Text deleted: “and Representative Aboriginal Organisations” (2020, p.111.)

<i>Item</i>	<i>Change</i>
81	Text replaced: ss 9.1 'Natural values research' - [Old]: "the government and research institutions" [New]: "government, research institutions and citizen scientists" (2020, p.114.)
82	Text inserted: "Citizen Science is recognised as making an increasingly important contribution to research, monitoring, and our knowledge of natural values in Canberra Nature Park (see section 9.1.3)." (2020, p.114.)
83	Text replaced: [Old]: "There are plans to extend"  [New]: "Future reintroductions of additional species may occur over time, based on expert advice. In 2019, the Sanctuary was extended to the south into Goorooyarroo Nature Reserve to include an additional 801 hectares of box-gum grassy woodland surrounded by a predator proof fence. Feral animals such as rabbits, hares, foxes, and cats are being removed before planned reintroductions of native species take place." (2020, p.115.)
84	Text inserted: "The Sanctuary is supported by the Woodland and Wetlands Trust through expert advice, fund raising, innovative management, community support, education and nature-based recreation." (2020, p.115.)
85	Text inserted: re the ACT Grassland Enhancement Program 2015-2018 "The findings of this program are being implemented as part of the ACT Government's herbage mass management and ecological burning programs. Monitoring will continue for at least five years after treatment." (2020, p.116.)
86	Text inserted: "Forest research Extensive research on forest ecosystems has been undertaken over many years in Canberra Nature Park, particularly in Black Mountain Nature Reserve, which has a history of more than 50 years of research and monitoring by the ACT and Commonwealth governments, universities, CSIRO and citizen scientists. Research on Black Mountain has included studies on the distribution, population size and age structure of selected fire sensitive tree and shrub species to provide baseline data for fire management; the timing of life cycle events such as flowering; and the habitat requirements of forest fauna species." (2020, p.116.)



<i>Item</i>	<i>Change</i>
87	Text inserted: "Canberra Nature Map also acts as a conduit for community research with projects relating to fire and orchids, Gang-gang nesting, ant taxonomy and butterfly breeding ecology. New data are constantly being added." (2020, p.116.)
88	Text replaced: Under ss 9.3 'Monitoring' - [Old]: "species" [New]: "species, kangaroos, vertebrate pests and invasive plants" (2020, p.117.)
89	Text replaced: under ss 9.3 - [Old]: "link management actions, their effect on the pressures on biodiversity, and consequences for the state of" [New]: "determine the effectiveness of management in conserving" (2020, p.117.)
90	Text replaced: [Old]: "link management actions, their effect on the pressures on biodiversity, and consequences for the state of"  [New]: "determine the effectiveness of management in conserving" biodiversity (2020, p.117.)
91	Text replaced: [Old]: "pinguicolla), Superb Parrot ( <i>Polytelis swainsonii</i> ), Button Wrinkle Wort ( <i>Rutidosia leptorrhynchoidea</i> ),"  [New]: "lineata), Little Eagle ( <i>Hieraaetus morphnoides</i> ), Superb Parrot ( <i>Polytelis swainsonii</i> ), Golden Sun Moth ( <i>Synemon plana</i> ), Button Wrinkle Wort ( <i>Rutidosia leptorrhynchoidea</i> ), Ginninderra Peppercreese ( <i>Lepidium ginninderense</i> )," (could be seen as responding to submitter concerns) (2020, p.117.)
92	Text inserted: "-annual surveys of Eastern Grey Kangaroo ( <i>Macropus giganteus</i> ) population densities, and their impacts on grassy habitats - quarterly spotlight monitoring of vertebrate pests, including rabbits" (could be seen as responding to submitter concerns) (2020, p.117.)
93	Text inserted: "activities, including monitoring of threatened species, vertebrate pests and weeds, and to inform restoration" (could be seen as responding to submitter concerns) (2020, p.118.)

<i>Item</i>	<i>Change</i>
94	<p>Text replaced: [Old]: “fire regimes – developing effective restoration/management”</p> <p>[New]: “different fire regimes, including the season, frequency and intensity of burning – developing effective restoration and management” (2020, p.119.)</p>
95	<p>Text inserted: ss 10.1 ‘Environmental assessment and approval’ - “In deciding a development application for a development proposal in Canberra Nature Park, the decision maker must consider this reserve management plan.” (2020, p.122.)</p>
96	<p>Text inserted: “Management agreements are in place for Icon Water, ActewAGL and several other utility providers operating in Canberra Nature Park. Management agreements will be developed for those utility providers operating in Canberra Nature Park currently without one.” (2020, p.123.)</p>
97	<p>Text replaced: [Old]: “Design and construction is determined by the local site conditions but drains are often integrated into management trails on the edges of reserves.”</p> <p>[New]: “Drains are often integrated into management trails on the edges of reserves. Design and construction is determined by the local site conditions but must be compatible with conservation of environmental values.” (2020, p.123.)</p>
98	<p>Text replaced: (stock grazing) [Old]: “in Kinlyside supports the management of Golden Sun Moth populations, and grazing in Crace Grasslands supports Striped Legless Lizard habitat.”</p> <p>[New]: “can be used if necessary to maintain habitat for threatened grassland species such as Golden Sun Moth and Striped Legless Lizard (see section 2.5.2). No public access is allowed to rural lease areas without permission from the rural lessee.” (2020, p.125.)</p>

<i>Item</i>	<i>Change</i>
99	<p>Text replaced: ss 10.10 'Planning, approvals and compliance: management policies, objectives and actions' - [Old]: "80 Implement hygiene protocols during all works, management activities and events. 81"</p> <p>[New]: "84 Establish management agreements under the Nature Conservation Act with all major utility providers operating in Canberra Nature Park. 85 Implement hygiene protocols during all works, management activities and events." (2020, p.127.)</p>
100	<p>Text replaced: [Old]: "action. 85 Harness technology to improve delivery and reporting of management actions. 86"</p> <p>[New]: "action, including the issuing of infringement notices or prosecution where necessary. 90 Harness technology to improve delivery and reporting of management actions." (2020, p.127.)</p>
	[End]