



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

Senior Strategic Planner  
 Research and Planning  
 Parks Conservation and Lands  
 Department of Territory and Municipal Services  
 PO Box 158  
 Canberra ACT 2601

Dear Madam/Sir,

### **TIDBINBILLA DISCUSSION PAPER COMMENTS**

Thank you for the opportunity to comment on the Tidbinbilla Discussion Paper for a new plan of management. We congratulate the department on preparing and circulating this paper as it gives us a chance to make comments before priorities have been too deeply entrenched.

The discussion paper sets out a series of changes which Tidbinbilla Nature Reserve has seen over the past six years since the 2003 bushfires. Our members would like to emphasise that, despite these superficial changes, Tidbinbilla remains essentially the place we love and respect, a nature reserve where so many of us introduced our children to the joys of the Australian bush. Our overriding concern is that this lovely little valley retains its unspoilt nature and continues to play a vital role in the ACT's nature reserve system.

The National Parks Association of the ACT has had an interest in, and association with, Tidbinbilla Nature Reserve since its inception and has been providing expertise and advice. Dr Nancy Burbidge, CSIRO plant taxonomist and founding member of NPA ACT, wrote a letter *Tidbinbilla National Park Mis-titled (The Canberra Times, Saturday July 11 1964)*. Dr Burbidge stated that 'Tidbinbilla Fauna Reserve has resulted from a proposal submitted by the Royal Society of Canberra, a good deal of the preliminary planning having been carried out by Dr R Carrick of the CSIRO Division of Wildlife ...' Dr Robert Carrick was elected as the inaugural and provisional President at NPA's formation in March 1960.

She incorporated two quotes which are as appropriate now as they were then: From Theodore Roosevelt, 1903: "We have gotten past the stage, my fellow citizens, when we are to be pardoned if we treat any part of our country as something to be skinned for two or three years for the use of the present generation." and from the late King George VI: "The wildlife of today is not ours to dispose of as we please, we have it in trust, we must account for it to those who come after."

In 1965/1966, the Minister for the Interior approached NPA ACT asking for a representative to the Advisory Panel of Tidbinbilla Fauna Reserve. The representative selected was Dr Robert Story, NPA ACT founding member and CSIRO plant ecologist who had also helped conduct plant surveys in preparing the submission for the proposal for a National Park for the National Capital, now Namadgi National Park.

NPA ACT's interest and concern with Tidbinbilla Fauna Reserve has continued to the present. During the 1960s up until the 2003 fires, many of our members walked in the reserve to enjoy its natural beauty and in turn took their own children along the Red Hill and Cascade walks and into the fenced-off enclosures. With the forest, creeks and cascades plus emus, kangaroos, itinerant snakes and elusive koalas, there was little need to contaminate the experience with playgrounds and theme park experiences. We enjoyed nature for what it was and were escaping from the commercial and artificial aspects of life which are a point of concern in the Tidbinbilla discussion paper.

During walks some of our members have marvelled at the beautiful *Eucalyptus tingaringi* which grew on the Pimple, near Tidbinbilla Peak before the 2003 fires. It has a restricted distribution and according to an ACT government forest ecologist, was recorded before the fires on a spur on the west side of Tidbinbilla Range. It hasn't been recorded in any of the post-fire monitoring plots but may have survived because it is a re-sprouting species. The vulnerable *Eucalyptus tingaringi* is an example of one of the values that Tidbinbilla Nature Reserve enshrines and needs to protect, and it should be emphasised in any display or educational program.

### **Structure and Content of the Discussion Paper**

To begin with, we do need to point out that the delineation of the Special Purpose Reserve is not clear on the map on page 5, leading to confusion about what is proposed where.

More importantly, we are also concerned that the structure and content of the Discussion Paper may in fact hinder the development of a proper management plan for Tidbinbilla. The paper relies on setting open-ended questions for discussion without the proper information and direction which developing a plan for a nature reserve requires. It looks very much like a fishing expedition, an opportunity for all sorts of schemes and ideas to be brought forward with subsequent tangles of expectations and disappointments when these are revealed to be not compatible with the management of a nature reserve.

We are unsure as to what are to be the outcomes of the Discussion Paper. Are you looking for a popularity contest, with  $x$  number of submissions favouring tourist accommodation in the Special Purpose Reserve and  $y$  number objecting to them? We expect a strong community discussion to raise other issues which are not allowed under current management plans for reserves and we cannot possibly comment on them all. What process will sort out what is possible and what is not permitted? What process will eliminate foolish ideas and loss-making tourist proposals?

For example, there is no discussion of the wider recreational opportunities in Tidbinbilla such as mountain biking and horse riding and where they may fit in with the Special Purpose Reserve precinct. The format of asking open questions such as "What range of recreational activities that are compatible with management objectives for conservation, education and research, can be accommodated at Tidbinbilla?" is

substantially weakened by the fact that there are no specific management objectives for conservation, education and research to refer to and hence the reader is confused or left open to the expectation that anything goes. Horse riding is not allowed at the moment and NPA members would not want it allowed in future so we have not addressed this issue. So what will happen if the Horse Riders Association puts in a strong submission for tourist-focused horse rides and we haven't objected? Would this be taken as assent? What if the draft management plan includes approval for horse riding and off-road mountain biking in Tidbinbilla if they can be shown to have a tourist focus? We hope you see our dilemma here in drawing up our response to this paper.

Other areas of the Discussion Paper pose similar difficulties but we will try to keep our comments focussed on the main game: development of a suitable management plan for an ACT nature reserve and education facility.

### **Overview**

The Discussion Paper is infused with a fair amount of woolly thinking in its approach. Trendy words such as 'hub' are interspersed with important sounding but meaningless phrases such as "to become a well-recognised and respected scientific research facility with strong educational benefits". The discussion paper calls up the same tired old 'vision' which Tidbinbilla is subjected to from time to time: a semi-commercial income-generating site based on unrealistic views of its wider marketability, this time with a scientific and educational boost from a merger with what is in fact only a small outpost of ACT Education, Birrigai. We need to be very careful we don't get carried away with grandiose visions which have little relationship to our much loved but limited Tidbinbilla.

There may well be a place in the ACT for a semi-commercial tourist/ education /science hub. Tidbinbilla is not it. It is a remote, unremarkable valley with an indigenous heritage, some pastoral heritage, some conservation values and some pretty landscape, next to an outpost of the ACT education system. The well documented difficulties in establishing a successful tourist hub, a scientific and research facility and all the other things on the wish list in the Discussion Paper appear in tandem with corporate sponsorship, private tourism development and a blind eye to the current economic crisis. This approach must not be reflected in the actual management plan.

The new management plan needs to recognise past experiences and difficulties including fire vulnerability, low visitor numbers, remoteness from the city and the lack of iconic or 'charismatic' species or experiences. It needs to put in place a clear vision for the Tidbinbilla/Birrigai precinct within the broader landscape, within the broader community values and requirements and within the tight fiscal responsibilities of the government. It needs to be practical, responsible and long term. To do that the following key issues need to be addressed.

### **Managing Tidbinbilla Nature Reserve**

The paper refers to the need for "new models of management in place" but we have serious concerns about the current operation of the reserve:

1. At a time when the new area of Jedbinbilla has been added to the Tidbinbilla estate, professional ranger positions in the reserve have been reduced by three.

2. Recreation opportunities for families and bushwalkers have been severely curtailed by the failure to restore much loved walks in the Cascades area, across to Mt Domain and down to the Cotter River.
3. The discussion paper speaks of walking trails but our experience has proven them to be fire trails whose gradient and routes are highly inappropriate as walking tracks because of the requirements to meet class 1 fire vehicle trail standard. The rollovers on Camel Back Trail are certainly not family friendly and the last section of the famous Gibraltar Rock trail is so steep and slippery as to be dangerous to all but the fittest.
4. There has been a definite sidelining of Friends of Tidbinbilla, a long-term voluntary group. They were not even invited to the launch of the discussion paper, an omission which we find quite disturbing. NPA ACT understands that their work is being hampered by a lack of management support, misplacement of their tools and a downgrading of the value of the work they do.
5. The management model is underpinned by generous funding for initiatives which cannot be sustained in the long term. The contract with Conservation Volunteers Australia provides for three full time employees to supervise and train 55 volunteers whereas across the rest of the PCL estate there is .5 ASL to train and assist the entire Parkcare program. There is currently a full time officer working on marketing of Tidbinbilla while the rest of the national park and reserve system has no marketing officer at all.
6. There appears to be little cross referencing of skills, solutions and management approaches with the rest of PCL. For example, the discussion paper speaks of “Ongoing requirement for substantial management resources...” (p5) yet resource requirements are no greater and probably less than those of Namadgi whose fire damage was on a greater scale, or the urban nature parks where visitor use is much higher.
7. There is no link between the intended leadership of Tidbinbilla as an introduction to the great outdoors and the rest of the ACT nature estate. What is being proposed is a stand-alone tourist venture which will absorb the promotion and maintenance dollars but which has no plan to transfer interest generated by visitors into further outdoor experiences such as camping in Namadgi National Park, bird watching in Jerrabomberra Wetlands or swimming in Murrumbidgee River Corridor. This short-sighted and narrow approach is one of our greatest disappointments in this Discussion Paper.

Our greatest concern about this discussion paper is that it focuses on a small area of the ACT reserve system and magnifies its problems and opportunities without reference to the wider experience of reserve management and opportunities in the territory. The existing management model is not economically sustainable.

### **Changes in governance**

The discussion paper places great emphasis on the move to joint management of Birrigai and Tidbinbilla as a unique opportunity to develop the Tidbinbilla precinct as an educational and scientific hub with limited accommodation. Birrigai has always been a very small part of the ACT education program and it brings little in the way of additional resources except for some existing accommodation and land whose use is

less constrained by legislation than the nature reserve. We would urge members of the Tidbinbilla/Birrigai Board of Management to be cautious about seeing the change in governance as facilitating major change in land use or ushering in a new era of tourism and scientific opportunities.

### **Damage done by 2003 fires**

The discussion paper surprised us by referring to the damage done by the 2003 fires as being reason to change the way the reserve is managed. Elsewhere in the ACT the 2003 damage was repaired quickly, even in difficult areas such as the swamps in the wilderness. The change in vegetation, public use and loss of infrastructure were experienced to a greater or lesser degree elsewhere in the reserve system and the changes they required in land use and management models were minor and easily dealt with.

### **Tourism**

Tidbinbilla has long been viewed as potential tourist destination which could be made to make some financial returns to the ACT government. It has a single entry point which would make fee collection easy and a defined area of some conservation value plus high landscape values with its rim of imposing ridges. The Discussion Paper states on page 12 what it considers Tidbinbilla's tourism advantages: that it is "close to the national capital, located on a major tourist route (unspecified) and offers excellent opportunities to introduce visitors to the landscapes, plants and animals and cultural heritage of the region...". It states bluntly (page 6) that tourism will be accorded a greater profile – supported already by the appointment of a full time promotions officer. Yet on page 19 the paper states that Tidbinbilla is not equipped for providing visitor services, even under the new management model and that visitors are attracted to the national institutions rather than rural tourism venues such as Tidbinbilla. Further evidence of the difficulties with tourism in this area is demonstrated by the withdrawal of the Nolan Gallery from Lanyon by the ACT Government at great trouble and expense.

Over the past few years there has been an opinion in some quarters that all Tidbinbilla needs to achieve financial viability is an increase in various types of infrastructure which people will pay to experience. A cafe and art gallery have already been tried and failed. Following the fires, over \$7 million has been spent on infrastructure in the valley yet visitor numbers continue to stagnate. Further vamping up of Tidbinbilla, with or without the much touted aerial walkway, is at best a courageous gesture, at worst an expensive drain on the government budget. In fact, Tidbinbilla does not have any outstanding natural features or iconic species which would make it a must-see tourist destination and draw the interstate and international crowds needed to justify even the current range of public expenditure, let alone increased investment.

### **Commercial tourism and partnership ventures**

The discussion refers to nature based tourism as an area of growth generally in Australia, a reference clearly written before the current collapse in the Australian tourism industry. However, the statement is very much in keeping with the National Landscapes Program, and Tourism and National Parks initiatives being promoted by bodies such as the Transport and Tourism Forum. It is fair to say that tourism is currently in a state of flux and that there has been a significant push over the past two years to freshen up the industry by opening up national parks to private development supported by public investment in infrastructure such as more roads.

NPA ACT is very clear that introduction of commercial or ‘partnership’ ventures in Tidbinbilla would meet very strong opposition not only because of its negative impact on the conservation values of the area but also because of the high level of reliance on public funding which these venture always end up requiring.

### **Specific points raised in the discussion paper**

#### **Framing the Statement of Purpose**

This is a deeply worrying section of the Discussion Paper because of the exploitative approach to Tidbinbilla for which it seeks acceptance. It is our very firm opinion that the management plan for Tidbinbilla

- should not contain reference to “ecologically sustainable development” in any of its fashionable guises because this is a nature reserve, not a development site;
- should not contain reference to “innovative recreational opportunities” as this is dangerously open-ended for a nature reserve;
- does not need to specify “captive and free-range” wildlife unless it intends to set up a zoo;
- should not identify as its statement of purpose to be “a key element in the Territory’s tourism attractions”; and
- should recognise that community participation should not be just a contract-driven activity with an organisation based in Melbourne which appears to exclude other community organisations.

In summary, this section is a very unsatisfactory example of how the Discussion Paper could mislead the community, which we referred to in our opening paragraphs. If, in fact, the major purposes were to be the protection, preservation and conservation of the natural and heritage values (not ‘ecological communities’ as the paper states) then there would be very little opportunity to build the tourism attractions and developments which this section foreshadows. The purposes as set out appear more relevant to an open air zoo (we already have one on Lake Burley Griffin) or theme park.

#### **Ranking of values**

Conservation of natural and cultural values should be ranked the highest for the simple reason that without the natural and cultural values of the area, tourist and other initiatives cease to appeal. Because of its topography, soil, vegetation and climate Tidbinbilla can only tolerate low-level recreation and tourism without sustaining damage to its natural and cultural values and this should be recognised in the management plan.

#### **Issues relating to natural values**

Again, the limitations of this discussion paper are evident here. For example, in its approach to the kangaroo problem, there is no reference to the Kangaroo Management Strategy being developed by PCL but an assertion that the kangaroo problem in Tidbinbilla can be managed in isolation from the rest of the estate. The issues raised in this section are very well addressed in the Namadgi Management Plan, why are we re-inventing the wheel here?

### **Issues relating to Aboriginal cultural heritage values**

Again, these issues are well treated in other management plans but raised here as new or provoking issues.

### **Issues relating to European heritage**

See above

### **Issues relating to landscape values**

All development in Tidbinbilla should be restricted to low-key, essential infrastructure which does not impact on the landscape values of the area. This section is deeply worrying in that it seems to be endorsing the suggestion of building a fake 'historical' village as a tourist attraction. Not only are these tourist attractions failing commercially, it is absolutely inappropriate in this precinct. Any historical restoration must be carried out in accordance with the Burra charter. The existing historic village of Tharwa just outside the Nature Reserve could be an appropriate partner for historical heritage development. Again, in raising this issue we see the difficulties raised by the tone and content of the Discussion Paper.

### **Issues relating to educational values**

Birrigai is, as already stated, a very small part of the ACT educational program and has been considered expendable in many budget cutting exercises. It will not bring many new resources into management of the precinct and it would be well to tread carefully in any proposed expansion of responsibilities to be assumed by the Tidbinbilla side of things. The community is constantly told that the ACT curriculum at all levels is full, there is no capacity to introduce new areas of study or expand old ones. So where will the additional education demand come from?

The nexus between the educational site at Birrigai and scientific research is non-existent. Any attempt to build such grandiose plans as proposed here has no place in a reserve management plan but may have found some traction in a venture capital proposal before the stock market crash.

### **Issues relating to scientific research values**

There is little factual evidence to support the assertion that Tidbinbilla is an appropriate place for scientific research, that scientists are happy to be disturbed by the public as they work or that it has unique attractions to attract corporate sponsorship. In fact this section outlines the obvious impediments to extending the research programs much beyond what is currently being done at Tidbinbilla. This again seems to be an instance of this discussion paper canvassing a development where extensive government investment would be required before it could attract corporate interest with a very uncertain long term gain.

Canberra is rich with some of the best scientific and research institutions in Australia with which this facility would have to compete on very unequal terms. PCL has a well regarded research section already and the cost of moving it, let alone the disruption to existing programs for no foreseeable benefit, would not be worth contemplating. The management plan is not the place to endorse such speculative ventures.

We are a little concerned that already this approach has resulted in a strange attempt at trying to build tourism around animal husbandry. The new buildings are set up to offer an opportunity for tourists and school children to watch animal autopsies from outside without any sort of supervision or educational interpretation. This is not an

obvious community value although we are assured it is very popular at an interstate animal refuge.

There is an assumption that scientific research also provides an educational opportunity for school children which may be a bit naive and needs very careful exploration. The important work being done already at Tidbinbilla on Corroboree frogs for example has to be protected from public participation because of the threat of infection.

We strongly suggest that the management plan steers well clear of speculative ventures and identifies a low-key role for research and animal facilities.

### **Issues relating to tourism values**

Regarding Tidbinbilla as a stand-alone tourism attraction, beyond the scope of our nature reserves and national parks, is the single greatest weakness and lack of vision which the discussion paper exhibits. Participation by the private sector again rears its head as the catch-all solution to the problems already discussed. The questions posed in this section are not related to a plan of management but seem to be seeking endorsement of tourist initiatives per se. However, in answer to the questions posed we say:

- Market Tidbinbilla as part of the wide range of outdoor and conservation based activities across the ACT including the Murrumbidgee River Corridor which must be crossed to get to Tidbinbilla, Tidbinbilla Tracking Station, the Cotter Reserve, Tharwa Village and most importantly, Namadgi National Park which shares a boundary. Links could also be made urban reserves such as the Jerrabomberra Wetlands which shares common conservation values for bird watching but has widely different species to observe.
- Provide better walking tracks, particularly iconic and popular ones such as the Fishing Gap to Mt Domain walk which has fallen so badly into disrepair. This walk along the ridgeline above the valley is clearly visible from any major hotel in the city and could be marketed nationally with some claim to iconic status. Other walks and opportunities such as snow play are ignored in this Discussion Paper.
- Build on existing infrastructure such as the children's playground to provide walks which are family friendly, interesting, have good interpretative signage and are accessible for prams and wheelchairs.
- Don't rely on the private sector to do the work better or cheaper, it won't! The CVA partnership shows how much public investment needs to be made before the private sector becomes interested and then their profits must be added to the cost price.
- Don't dismiss existing community volunteer organisations in favour of expensive, full-cost recovery models.
- The nexus between tourism and science, particularly for families and schoolchildren is already well catered for in Canberra and it will be very difficult to compete against. For Tidbinbilla to build either tourism or research initiatives on this vague hope requires a leap of faith NPA ACT cannot make.
- Yes, if hordes of visitors came, this would impact on the conservation values of the precinct. The best way to manage such challenges is to manage the

demand, not allow intrusive tourist developments to be developed in the first place and to respect the priority which conservation must take over tourism if tourism is to have any long-term benefit.

- The matter of public transport to the precinct seems set to join the perennial debate about the profitability of public transport within the city. Indeed, if a captive, commuting workforce fails to support a profitable public transport system we cannot see how the lesser demand by tourism over a greater distance can support a scheduled transport service without subsidy. We would suggest that any investigation of this option is a waste of resources.
- Either way, a regular bus service to Tidbinbilla is a public cost which has to be counted against any tourism gains and any private investment.
- There has long been a wish to build camping or more sophisticated eco-tourism accommodation in Tidbinbilla to improve its tourist appeal. NPA ACT opposes such a move, particularly as it is proposed here in isolation from any consideration of existing camp grounds in the reserve system such as the Cotter and Woods Reserves. If there is a demonstrated need, it should be based in the Birrigai area of the precinct or in nearby Tharwa or Canberra suburbs.

In summary, NPA ACT would like to see a professional, high-quality management plan for Tidbinbilla which recognises its value as a nature conservation area and intelligently encourages activities which promote an understanding of conservation among schoolchildren, local families and tourists. We do not want to waste time and money working up unrealistic, expensive schemes and ventures in a contracting tourist industry or which promotes vain attempts to build the Birrigai/Tidbinbilla precinct into a science/research hub. We need to be practical as well as respectful of our natural and cultural heritage.

Yours sincerely



Christine Goonrey  
President  
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