



National Parks Association of the ACT Inc.
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50 years of conservation, nature protection and education

Gungahlin Strategic Assessment
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Gungahlin Strategic Assessment Submission

Thank you for the opportunity to make a submission on the Gungahlin Strategic Assessment (“the Assessment”). As you may know, the National Parks Association of the ACT (“NPA ACT”) is a community-based conservation organisation with more than fifty years of working to protect our natural environment through an active outings and workparty program; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs.

The NPA ACT has a particular interest in north Gungahlin as the areas of box gum grassy woodlands there form part of the NPA ACT’s vision for a new national park in the ACT, based on this nationally important ecosystem.

Summary

Overall, the NPA ACT believes that the plan espoused by the Assessment will result in environmental benefits. It will enhance connectivity of natural areas in north Gungahlin and the additions to the ACT’s conservation reserves are welcome. The NPA ACT notes that rationalisation of reserve boundaries under the Assessment will reduce the “edge effect “ and make the management of the reserves easier. The NPA ACT is also supportive of the reporting system proposed for development under the Assessment. However, there are a number of issues that need to be more fully addressed within the Assessment. These include:

- The environmental impacts of the development in Throsby on superb parrot habitat
- The Impact of bushfire protection zones on reserves and areas of Hills Ridges and Buffers (HRB)

- The lack of transparency of land management agreements in respect to conservation outcomes
- The adequacy of ongoing funding
- The need for independence in the reporting regime

Detailed Comments

Additions to Reserves and HRB – The Assessment proposes that 661 hectares be added to the ACT’s conservation reserves and 120 hectares to HRB. The additions to Mulligans Flat and Gorooyaroo are welcome as they significantly reduce current edge effects. The proposed reservation of Kinleyside is well overdue, having been promised during the last three ACT elections. Both Kinleyside and Kenny proposed reserves do not adjoin any other existing conservation reserves. However, Kinleyside is linked via HRB to Mulligans Flat. Kenny adjoins HRB which itself is separated from Mt Majura only by the Federal Highway. From a point of view strengthening long-term connectivity, as a minimum, the NPA ACT would recommend that the existing HRB alongside the Federal Highway be extended north to Horsepark Drive. This would cover the existing two properties and the gas distributor junction facility. Such action would require that conservation aspects would have to be considered for these properties which would help facilitate connectivity to Kenny from other woodland areas.

Additionally, connectivity could be further strengthened with the planting of lowland grassy woodland trees and understorey in the public land along Sullivans Creek as far as Horsepark Drive in the direction of Gorooyaroo.

A concern that the NPA ACT has with key connectivity areas being managed as HRB is that the Land Management Agreements associated with the relevant areas are deemed to be commercial in confidence. Therefore, matters of public interest associated with these areas, such as the conservation requirements, are not subject to public scrutiny. Ideally, the HRB areas stretching from Kinleyside to Mulligans Flat should be recognised for their important grassy woodlands and connectivity values. The NPA ACT would argue that these areas plus existing grassy woodland reserves should be managed as a single entity. This would facilitate management in accordance with the requirements of Action Plan 27 on lowland grassy woodlands. Ultimately, the NPA ACT believes such areas should be amalgamated into a new national park for the ACT focussed on the enhancing the environmental values of the ACT’s lowland grassy woodlands.

The NPA ACT also notes that there is much urban open space around the periphery of Moncrieff and Jacka and within Taylor and an area of HRB at the southern end of Jacka. All this land has

important environment values as habitat and for connectivity. Although this public land will be outside the reserve system it will need a management regime to protect and enhance those values.

Long Term Funding for Offset Areas – The Assessment states that one its outcomes would be “funding for ongoing management of the reserve system, research, monitoring and conservation planning, and improvement of regional connectivity”. While not disagreeing with these aims, the NPA ACT is concerned that the Assessment later states that the funding of “offset and indirect actions would be generated through land sales and commitment of discretionary spending by ACT Finance”. While revenue raised through land sales is relatively reliable, reliance on ACT Government budget measures is not. Governments of all persuasions across all jurisdictions in Australia are placing greater budgetary restraint on their environmental agencies. Even if the Assessment is able to force commitment by the ACT Government to adequately funding any shortfalls in required offset and indirect actions such shortfalls would be likely to be funded through reductions in the operations and maintenance of other areas of the ACT’s conservation estate. The NPA ACT would therefore recommend that offsets and indirect actions are funded through land sales unless additional untapped and reliable funding sources can be found. The NPA ACT would support the Assessment in facilitating a review by the ACT Government into alternative funding sources for the environment. A key starting point for this would be assessment of the findings in the ACT Commissioner for the Environment and Sustainability’ report into environmental funding options.

Bushfire Protection Zones – The implementation of bushfire protection zones on areas reserved for conservation can significantly reduce environmental values in areas affected unless a sympathetic approach to the environment is taken. The NPA ACT would recommend that the new suburbs covered by the Assessment be ringed by perimeter roads, that no development should abut directly with reserves and that inner asset protection zones are outside the reserve boundaries. Fuel load management actions should not significantly degrade the environmental values of the areas affected.

Reporting Regime – The NPA ACT welcomes the reporting regimes outlined in the Assessment. However, it would be preferable for the responsibility for the preparation of such reports to be assigned to an entity independent of the ACT government and the implementation team. Alternatively the outcomes in the reports should be subject to independent scrutiny prior to release. The findings of such scrutiny should be publicly available.


Plan Implementation Team – The NPA ACT agrees with the concept of a plan implementation team but notes that many of its actions such as the preparation of management plans are functions that are already being carried out by other areas in the ACT bureaucracy. The NPA

ACT would be reluctant to see extensive duplication of functions through the establishment of the plan implementation team.

Throsby – The Assessment significantly reduces the size of Throsby with proposed welcome additions to the ACT's reserve system. The NPA ACT would question whether the remaining component for development should proceed. A key consideration in the reduction of Throsby has been to safeguard superb parrot nesting habitat. The Assessment has provided a 100m buffer around existing know nesting sites. However, one other key threats to superb parrots is the impact of Indian Mynas and a recent study (refer to the Canberra Ornithologists Groups submission to the Assessment) has shown that these birds will penetrate more than 200 metres into natural areas from suburban areas. This would raise into question the appropriateness of the proposed 100 metre buffer. Further extension of the buffer would erode the financial benefits of maintaining a suburb of Throsby.

The NPA ACT would be happy to discuss any of the issues raised within its submission, either in writing to our office address or through email (noting that the NPA ACT office is manned by volunteers and a daily presence is not able to be maintained). Alternatively, I or Clive Hurlstone can be contacted on 0410 875 731 or 0407 783 422, respectively.

Yours sincerely



Rod Griffiths
President

18 April 2013