



5 Milner Street,
Hindmarsh SA 5000

Phone: (08) 7127 4630

Fax: (08) 82319773

Website: www.ncssa.asn.au

National Parks and Protected Area Program Unit
Department for Environment and Water
GPO Box 1047 Adelaide SA 5001.
DEWProtectedAreaManagement@sa.gov.au

Wednesday 26 January 2022

Re: Draft Management Plan for Cleland National Park

To whom it may concern,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the draft management plan for Cleland National Park. Since 1962, the NCSSA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and the management of protected areas.

The NCSSA concurs with the draft plan that Cleland National Park protects a **very important area of bushland** within the Mount Lofty Ranges, maintaining precious natural values within a wider landscape that has otherwise been heavily cleared and modified. The NCSSA also acknowledges that the park attracts hundreds of thousands of visitors each year and provides an important opportunity for people to connect with nature and native wildlife.

Due to this popularity, it is critical that the management plan for the park unequivocally outlines how the natural values of the park will be protected from the impacts of visitation. Concerningly, as currently drafted, the plan contains contradictory statements regarding where development will be permitted in the park. It must be corrected to consistently state that there will be no further development within Conservation Zone A, including of tracks and trails.

Further detail on this issue, as well as other issues with respect to the draft plan, are in the comments attached to this covering letter.

If you would like to clarify or discuss this submission, please contact me on 0400 277 423 or via email at julia.peacock@ncssa.asn.au.

Yours sincerely,

Julia Peacock
Nature Advocate

NCSSA comments on the draft Cleland National Park Management Plan

General comment

Cleland is a very important remnant of native bushland within the Southern Mount Lofty Ranges, as only approximately 13% of the region remains uncleared.¹

One impact of this extensive clearance has been on bird species of the woodlands of the Ranges, which have declined markedly and continue to do so, as measured over the past two decades through the NCSSA's long-term monitoring program², for which there are 15 monitoring sites within Cleland.

It is therefore critical that the management of Cleland National Park prioritises the **conservation of natural values**, such as protecting threatened species and also providing habitat for all endemic native species including those currently considered more common. Visitation, whilst important for allowing people to experience and enjoy nature, must be undertaken in a way that does not compromise the protection of nature.

Developing this draft plan

It is not clear if this section will appear in the finalised plan, however, the following comment is concerning:

"This draft plan supports the park's ongoing role in the state's economic development and provides action to meet increasing demand for nature based tourism and guide investment in new tourism infrastructure in the park."

Whilst the NCSSA acknowledges the role parks such as Cleland play in attracting visitors and also that there may be increasing demand for nature-based tourism, the statement places too much emphasis on economic development and undermines the earlier statement about the change from Conservation Park to National Park 'strengthen(ing) the area's conservation and biodiversity values.'

Directions for management

The NCSSA supports Cleland National Park being managed primarily for conservation and acknowledges the importance of the area for Kurna and Peramangk people.

The NCSSA believes that National Park management plans should be recognised by the Planning and Design Code (the Code). South Australia's two state-based planning systems that both govern parks and reserves should refer to, and mutually reinforce, each other. Therefore, the NCSSA does not support the statement that the zones set out in the plan do not relate to the Code. Rather, adopted park management plans should be referenced by the Code, and subsequent planning decisions guided by them. This is critical because the Conservation Zone policy in the Code **does not contemplate any areas where no further development is allowed**, which contradicts the policy for Conservation Zone A as identified in this draft plan.

The NCSSA strongly asserts that the statement on page 4 that "Outside these zones (*i.e. Visitor Use Zones*), visitor facilities will be restricted to low impact uses such as picnic areas, walking and cycling trails, and ancillary facilities such as shelters, toilets and barbecues" **should be deleted**. It is contradictory to the statement on page 9 regarding policy for Conservation Zone A, which is that "no further development is permitted in this zone."

¹ Armstrong, D. M., Croft S. J., and Foulkes J. N. (2003). A Biological Survey of the Southern Mount Lofty Ranges, South Australia, 2000-2001. (Department for Environment and Heritage, South Australia).

²https://www.ncssa.asn.au/index.php?option=com_content&view=article&id=110:overview12&catid=51&Itemid=349

What are we looking after?

The NCSSA supports these dot points as being a good summary of key values of the park.

Challenges and opportunities

Given the NCSSA's long-term commitment to monitoring woodland birds, it supports 'reversing a general decline in bird populations across the Mount Lofty Ranges' as a key challenge as identified in this draft plan.

The use of the phrase 'ecological advantage' in relation to managing bushfire risk is odd and should be redrafted, and should reflect that over-burning is a risk for bird species (see later comments on Fire Management for more information).

Park management zones

The NCSSA strongly supports the policy of **no further development** within Conservation Zone A in order to protect the high conservation value of this part of the park.

As mentioned earlier, it is essential to make sure all references to future development within the park contained in the plan reflect this policy intent.

The NCSSA supports the intent to improve Conservation Zone B to a quality that would enable it to become part of Conservation Zone A, noting this will require considerable resourcing.

Theme 1: Conserving and enhancing wildlife

The NCSSA supports this theme as the key priority for management of this park. The NCSSA strongly suggests that Appendices listing rare and endangered species that occur in the park **should be included in the plan**, as a means of further highlighting the natural assets being cared for.

The NCSSA supports the nomination of bogs for listing as a nationally threatened ecological community, noting it is the *Environment Protection*, not *Environmental Protection Act*.

The NCSSA supports reference to the Regional Recovery Plan for Threatened Species and Ecological Communities as a key document to guide action, and supports the preparation of a separate, more detailed, biodiversity plan for the park.

The NCSSA acknowledges that weeds can provide habitat for species such as Southern Brown Bandicoot and Bassian Thrush, however, the statement "where this is no regenerative potential to return the landscape to its native biodiverse state, the value of these weeds in providing habitat should be acknowledged" needs rewording. All landscapes have "regenerative potential", but some are beyond the scope of resources that can be, or will be, made available.

The NCSSA supports the management of total grazing pressure, since overgrazing can impact on natural values including threatened species, including by culling if necessary.

For clarity, the 'objective and strategy' for Conservation Zone A should be reworded from "restrict future development in Conservation Zone A including new tracks and trails" to "no further development in Conservation Zone A, including new tracks and trails".

The impact of foxes, particularly on Southern Brown Bandicoot populations, as well as deer in the park should be acknowledged and addressed in the plan.

Theme 2: Enriching experiences at Cleland Wildlife Park

The NCSSA notes plans for new overnight tourist accommodation within the Cleland Wildlife Park precinct. This will require careful planning and, in order to protect natural values in the park, it will be important to ensure any clearance for the buildings or for fire safety is minimised.

The NCSSA supports a 'conservation dividend' being required from any development within the park, but also argues that adequate, baseline funding to undertake management actions such as weed control and visitor management for the park should be included in the State Budget.

Theme 3: Providing a variety of visitor experiences

The NCSSA understands that cycling in park, which has been permitted since 2010, can be problematic because the shared trails can be made dangerous by fast-moving bikes, for example for families with children, and that bikes can disturb people undertaking quiet, slower activities such as walking and birdwatching. There is also evidence that some cyclists do not respect restrictions in place on cycling in the park and take bikes over fences and/or create illegal trails. This behaviour should be recognised in any review of the Trails Master Plan and all efforts made to minimise it. In recognition of the environmental damage mountain biking can inflict and the importance of conserving the natural values of Conservation Zone A, it should not be permitted in this area.

The NCSSA supports rationalising (reducing) tracks in Conservation Zone A and 'closing and monitoring illegally built, redundant and unsustainable trails in the park'.

Theme 4: Managing fire

The NCSSA acknowledges that managing fire is a key objective of fire management, and that climate change is exacerbating fire conditions.

The draft plan should acknowledge that there is a state-wide framework for bushfire management through the *Fire and Emergency Services Act 2005* and a Bushfire Management Committee for the Adelaide and Mount Lofty Ranges region.

The NCSSA believes that the 'ecological needs' of the park should be elevated in any considerations relating to fire management, and that the plan should reference evidence in relation to burning, for example of decline in birds observed at burnt rather than unburnt sites. This evidence provides a strong basis for arguing for the retention of long-unburnt woodland habitat.³

The NCSSA is concerned about foreshadowing the creation of 'new fire management infrastructure', as this could include tracks in sensitive areas. The NCSSA supports increased firefighting capability, including early response through **aerial suppression of fires** before they become dangerous, large and/or unmanageable.

Theme 5: Collaborating to progress shared outcomes

The NCSSA supports collaboration, as the NCSSA is an eNGO which undertakes research within the park.

³ Prowse, Thomas A.A., Collard, Stuart J., Blackwood, Alice, O'Connor, Patrick J., Delean, Steven, Barnes, Megan, Cassey, Phillip, and Possingham, Hugh P. (2017). Prescribed burning impacts avian diversity and disadvantages woodland-specialist birds unless long-unburnt habitat is retained. *Biological Conservation* 215 268-276. <https://doi.org/10.1016/j.biocon.2017.09.005>