



The ACT Equestrian Association Incorporated

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CNP Draft Reserve Management Plan
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Canberra Nature Park Draft Reserve Management Plan 2019

The ACT Equestrian Association (ACTEA) welcomes the opportunity to comment on the Draft Canberra Nature Park Reserve Management Plan (the Plan). ACTEA was established in 1970 as an umbrella organisation to represent all equestrians in their endeavours at all levels of achievement. ACTEA's sixteen affiliates include groups such as showjumping, dressage, horse trials and endurance riding as well as pony clubs and the riders who keep their horses in the Government Horse Holding Paddocks. Many of the owners of the 1700+ horses in the ACT, whatever their chosen discipline, are also trail riders, exercising their animals in public open space and the Canberra Nature Park system. Horse riders value the natural environment as an integral part of their recreational experience with their animals. Many of them are members of Parkcare groups and some government paddocks support their own Landcare groups and do not take the importance of protecting the unique characteristics of the Bush Capital lightly.

ACTEA would like to begin by expressing its appreciation for the proposal contained in the Plan to **trial the provision of additional horse riding access to defined trails in a small number of reserves**. We also appreciate the opportunity to discuss our concerns with aspects of the Plan directly with representatives of the Parks and Conservation Service.

We have real concerns about the content of Section 7.4.5 on Horse Riding in the Canberra Nature Park which we feel it is important to document.

ACTEA supported by funding from Sport and Recreation Services ACT

1. The Impact of Horses on the Values of the Canberra Nature Park

In Section 7.1 the Reserve Management Plan states quite even-handedly:

The challenge for the Parks and Conservation Service is to welcome and support visitors in Canberra Nature Park, and at the same time to minimise and manage environmental impacts that may result from recreational activities. These impacts include wildlife disturbance; damage to vegetation or tracks; soil erosion and compaction; exposure of roots, rocks and bedrock; changes in species composition; and the spread of weeds and plant pathogens.

Equally reasonably, the Plan continues

In meeting this challenge, management approaches outlined in this plan include:

- limiting disturbance in areas that are of high value and/or sensitive to impact
- restricting horse and mountain bike riding to identified tracks
- restricting dog walking (on leash) to identified reserves, and maintaining all other areas as 'dogs prohibited'.
- considering the needs of key recreational activities and promoting good visitor behaviour

ACTEA does not deny that it is possible, under certain circumstances, for horses to have an impact on Canberra's Nature Reserves but strongly believes that there is no activity that anyone can undertake in the environment which has no impact. This includes traditional activities like bushwalking. Professor Catherine Pickering of the Environmental Futures Institute at Griffith University suggests that 73% of visitors to Australian national parks carry seeds on their clothing, acting as vectors for the dispersal, along with their vehicles, bicycles, horses and dogs. *We've found in the research estimates of over 1.9 million seeds being carried by walkers into national parks, not intentionally, but just by being picked up as you go for a hike.* In this context, labelling the far fewer horses who have access to national parks as prime culprits in the degradation of the environment is irrational and extremely distressing to the equestrian community.

ACTEA has noticed, and appreciates, that the 1999 report, *Horse riding in Canberra Nature Park: a report to Environment ACT*, by Jill Landsberg no longer features as a reference to support a position on horses in nature reserves and we also appreciate that the ACT Parks and Conservation Service acknowledges the lack of evidence that horses are any greater distributors of weeds and pathogens and compactors of soil than any other users of the management tracks in our nature reserves.

ACTEA strongly supports the inclusion of an overarching statement at the head of Section 7 about the environmental impacts of the broad spectrum of users, including mountain bikes, of the Canberra Nature Park system and the management implications of this and the removal of these references from 7.4.5.

2. Appendix 5: Horse riding in Canberra Nature Park: Management Principles and Policies

ACTEA strongly endorses the removal of Appendix 5 from the Plan. The document is 20 years old and reflects an outdated and scientifically unsubstantiated attitude to horses using the management tracks in Canberra Nature Park. This is reflected in the fact that since its creation almost no part of the Principles contained therein have been implemented or enforced by Parks & Conservation.

The prohibition on endurance riding in **Policy #1** has never been implemented and the ACT Endurance Riders Association has been issued with permits to conduct events in the CNP regularly over the last 20 years. Endurance rides are not races and how these activities of 50 or so riders are more dangerous or threatening to other park users or the values of the Reserve system than mountain bike races run by commercial operators, involving 100+ bikes at speed, which are regularly issued with permits, is baffling to us. ACTEA is aware that the ACT Endurance Riders Association is making a separate submission on the Draft Plan and supports their detailed comments.

ACTEA rejects the idea that endurance riding is a dangerous environmental or public threat and proposes that endurance events be included under Section 7.5, on an equal basis with other organised events, which require permits.

The consequences of **Policy #3** is that most Activities Declarations allow horse riders to travel through a reserve, not in it. The policy is based on an unfounded assumption that riding a horse on a management track will have impacts an order of magnitude greater than any other user of the same tracks. The intent of Policy #2 is completely negated if horses riders can only travel in and out of a reserve in a straight line as if their destination is somewhere else. The destination for most weekend riders is a pleasant circuit ride to and from their paddock taking a couple of hours at most. Almost none of the reserves in which horses are welcome allows for such an activity. The pointlessness of this policy is reflected in the fact that horse riders, in their innocence of Activity Declarations, have been riding loops in nature reserves near their horse paddocks for decades with, as far as ACTEA can tell, no one noticing or caring.

ACTEA welcomes the undertaking by Parks & Conservation to trial the provision of additional horse riding access on defined trails in a small number of Canberra Nature Park Reserves based on the criteria identified in Section 7.4.5.

Parks appears not to have been moved to implement the Code of Conduct referred to in **Policy #7** in 20 years. Astonishingly, page 46 of the 1999 Canberra Nature Park Management Plan states that **a code of conduct for equestrian users is available from CNP district offices** but no horse rider, or anyone else for that matter, admits to having seen it. ACTEA has no objection to such a document, only to being the only group required to have one. The ACT Trails Strategy recommends the development of a Code of Conduct for all users of the CNP and ACTEA would happily support that. We don't support being singled out as a vexatious visitor to our valued nature reserves. There are existing horse riding Codes for NSW and Queensland, most of which reflect the principles of Horse Riding Best Practice but notably afford many more amenities to horse riders than are ever likely to be available to us in the ACT.

ACTEA is happy to be party to a general Code of Conduct for users of the CNP or to have a specific equestrian code as long as other users of the Reserve system are also required to abide by a similar Code.

ACTEA believes the basic principles expressed in Policies ## 4,5,6,8 and 9 are all matters that are already covered in or could be included under Horse Riding Best Practice.

ACTEA applauds the proposal to remove Appendix 5 as a document from the Plan of Management.

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3.Box 3: Horse riding — best practice

ACTEA is happy to abide by horse riding best practice but some of the 'practices' require some clarification

- Do not allow horses to graze on any **native (?)** vegetation while within Canberra Nature Park. **[Horses are only going to graze on grass on the verges of management tracks. Since these tracks are mown for fire management and environmentally grazed, protecting an introduced species in a reserve seems ridiculous. We suggest the point be clarified]**
- Do not allow horses in dams or watercourses. **[Horses need to drink. They step into water to drink. The BNT crosses numerous water courses through Canberra. Parks and Conservation staff have spent considerable time over the last five years with the BNT Coordinator trying to find a natural crossing of the Molonglo River in the Molonglo River Park. This needs better wording.]**

4. Alternative Riding Opportunities

ACTEA notes that in Section 4.4.6 mountain biking areas outside the ACT Reserve system are listed including Stromlo Forest Park, Majura Pines, Isaacs Pines, Kowen Pines, Tuggeranong Pines and Fadden Pines.

ACTEA is disturbed that all of these places are presented only as mountain biking destinations. In many of these areas ACTEA has fought, and continues to fight, hard to protect the existing equestrian trails from the encroachment of mountain bikes and there are now designated and marked equestrian trails. It is not helpful that Parks are writing horses out of the Territory's pine forests. There are dedicated equestrian trails at:

- Stromlo Forest Park
- Majura Pines
- Isaacs Ridge
- Canberra Arboretum

Tuggeranong Pines and Fadden Pines are near Government Horse Paddocks and the management tracks are used by horse riders. Horses legally access trails in the Lyneham Eucalypt Forest, Kowan Forest and Sherwood Forest via caveletti provided by the ACT government.

ACTEA requests that either the list of non-Reserve mountain bike destinations be removed from the Plan of Management or that an equivalent list be included in the horse riding section.

5. Activities Declarations

Equestrian access to the CNP is controlled by Activities Declarations made under sections 212 and 252 of the *Nature Conservation Act 2014*. The power of this piece of legislation over the recreational activities of horse riders is not explained well in this Plan or anywhere else. On page 77 the Plan says *Horses are prohibited in reserves unless an Activities Declaration under the Nature Conservation Act indicates that horse riding is permitted on identified trails*. This phrase does not make clear that it is the *Nature Conservation Act* which bans horses from all reserves and that access may, under certain conditions embodied in an Activities Declaration made under that Act, be granted to a particular reserve.

The only explanation for Activities Declarations appears under Grazing Management and in the Glossary where it is explained without reference to horses. Your average reader is not going to find these. At the bottom of Table 7.1 there is a footnote: *Additional horse riding trails to be trialled in a small number of reserves. Check current information in Activities Declarations at <www.legislation.act.gov.au/a/2014-59/ni.asp>.* Not a direct link and not much of an explanation.

If the Parks Services wants horse riders to comply with Activities Declarations it needs to make more of an effort to acquaint the equestrian community with them. ACTEA has found that the majority of horse riders have never seen one and have no idea they exist.

6. Parks and Conservation Service Website

On the ACT Parks & Conservation website (https://www.environment.act.gov.au/parks-conservation/parks-and-reserves/recreational_activities) there are 3 tabs relating specifically to mountain biking. Altogether there are over 1600 words devoted to mountain biking generally and at Mt Majura and Isaacs Ridge. This doesn't include the tab specific to the Centenary Trail. The Majura Pines tab does not even mention that there are designated equestrian trails in the reserve. The Isaacs Ridge site does little better. The take home message for equestrians however is contained in the Horse riding tab, the **entire** text for which is

To discover some of the places you can take your horse to ride in the ACT, please refer to the [Explore: Canberra parks and recreation guide](#)

The Explore website has no information aimed at horse riders. The Minimal Impact Code of Conduct doesn't even mention horses.

This is at least consistent with the total absence of images of horses in the Plan. There are more images of dogs in the Draft Plan than there are of horses and six of mountain bikes.

ACTEA requests that the Parks and Conservation Service admit that horse riders are regular users of the Canberra Nature Park and start to treat them in the same way they do other user groups, with useful information and advice available on the Parks' website.

7. Reserves as Shared Spaces

In several of the Best Practice boxes in the Plan reference is made to being 'considerate of other reserve users and avoid conflict with other visitors'. There is no advice that might help resolve potential issues between dog walkers, runners, horse riders and cyclists. The 1999 Management Plan states that **education is required if visitor conflicts are to be avoided** (p46) and it is still good advice. In other parts of the shared ACT recreational estate signage is used to assist people. At Stromlo Forest Park, Mt Majura, Isaacs Ridge and the Arboretum the international yield sign is used to guide users. These areas use a version of this sign which is based on the principle that the horse is the more reactive party. If Parks and Conservation is really interested in kinder user interactions ACTEA recommends this as the practical way forward.

This sign is included in the Municipal Infrastructure signage standards for equestrian routes and endorsed by Roads ACT for use on **on intersection of Equestrian Routes with Recreational Routes only including Principal Recreational Trails and fire trails where equestrians and walker and cyclist trails cross within recreational areas.**



While this sign appears on some websites it would be a much better plan to situate them where users will actually see them – in reserves.

ACTEA recommends that Parks and Conservation adopt the international yield sign based on the hierarchy of recreational users adopted elsewhere in the shared recreational spaces in the ACT.

In Summary

After fruitful conversations with Parks and Conservation, ACTEA looks forward to:

- A more balanced approach to the presence of horse riders in the Canberra Nature Park
- The removal of Appendix 5 from the Plan altogether
- A balanced approach to the issuing of permits for events in the Canberra Nature Park that does not discriminate against endurance riding
- Access to more pleasant loop equestrian routes in reserves close to government horse paddocks
- A better education and information strategy that acknowledges that horse riders are recreational users in the Canberra Nature Park.

Finally, ACTEA looks forward to discussing with Parks and Conservation as soon as practical a list of reserves where existing access would benefit by additional trails.

A question: Is there some reason why a section of the BNT continues to travel through Oakey Hill NR (p168), many kilometres from the rest of the trail, despite our pointing out the error in 2016? Is there something we don't know?

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16 December 2019