



Nature Conservation Council

The voice for nature in NSW

NSW Local Land Service

By email: tsr.feedback@lls.nsw.gov.au

4 December 2015

SUBMISSION TO NSW TRAVELLING STOCK RESERVES DRAFT STATE PLANNING FRAMEWORK 2016-19

Dear Sir/Madam,

The Nature Conservation Council of NSW (**NCC**) is the peak environment organisation for New South Wales, representing 150 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

INTRODUCTION

We welcome the opportunity to comment on the NSW Travelling Stock Reserves Draft State Planning Framework 2016-19 (**draft Framework**). The Travelling Stock Reserve network (**TSRs**) provides key environmental, economic, cultural and social benefits to NSW, and it is important that there is an overarching framework that provides clear and consistent guidance for managing and protecting those important values.

Our submission addresses the following key issues:

- The important conservation and social values of Travelling Stock Reserves
- Key issues for the State-wide management of Travelling Stock Reserves
- Specific comments on the NSW Travelling Stock Reserves Draft State Planning Framework 2016-19

THE IMPORTANT CONSERVATION AND SOCIAL VALUES OF TRAVELLING STOCK RESERVES

The TSR network provides key environmental, economic, cultural and social benefits to NSW. Historically, TSRs have been retained for travelling stock and grazing purposes and have not been cleared for settlement, agriculture or industry. As such, they contain important remnants of woodland vegetation in the otherwise highly-cleared wheat and sheep farming belt of New South Wales. Across the state, approximately 80% of TSRs contain vegetation communities of high or very high conservation status¹. Often, these remnants are the best examples of ecosystems and communities that are not well represented in the National Parks estate.

¹ NSW State of the Environment Report, 2006

The TSR network provides important biodiversity links between isolated conservation reserves and an opportunity for large-scale, connectivity-based conservation, which may mitigate the effects of climate change on native species by allowing species to migrate between reserves. Effective management and restoration of the TSR network would make a significant contribution towards state, federal and international biodiversity conservation targets.

Given the existence of remnant vegetation, the TSR network contributes to carbon capture and provides an important seed bank for native plants. TSRs can also provide suitable public land for environmental revegetation and restoration programs across the landscape.

The TSR network provides important connections for many Aboriginal Australians to traditional song lines, and contains many Aboriginal sites. It also connects Australians to the history of European colonisation and exploration, and this connection to TSRs and the droving lifestyle is reflected in folklore, poetry, songs and art.

The network has ongoing social importance, supporting a range of recreational activities and community groups involved in its management.

The National Parks Association of NSW, a member group of NCC, has done significant work in identifying the important conservation values of TSRs, and bringing together stakeholders to discuss the future management of TSRs². We are pleased that this work has been recognised in the draft Framework.

KEY ISSUES FOR THE STATE-WIDE MANAGEMENT OF TRAVELLING STOCK RESERVES

The NSW Government is currently undertaking a review of Crown land management, including the TSR network. The NSW Local Land Service (LLS) is responsible for the care, control and maintenance of almost 500,000ha of TSRs in NSW and is seeking feedback on a draft state-wide planning framework for TSRs to support the future management of that land.

NCC generally supports the development of a state-wide framework for managing TSRs. The network provides broad-scale connectivity across the landscape and is best managed consistently and transparently in order to protect important State and national values.

We have identified the following key issues for the effective State-wide management of TSRs:

1. State-wide plan for the management of TSRs

Given the important connectivity values of the TSR network, we consider that it would be most appropriate to have a single State-wide plan for the management of TSRs across the entire network, irrespective of which agency is responsible for the management of individual parcels of the network.

² See www.npansw.org.au/index.php/campaigns/tsr

We are concerned that the draft Framework only applies to the 490,927ha of TSRs managed by the LLS, rather than the total 1,985,908ha of TSRs in the combined management of the NSW Department of Primary Industries – Lands (Crown Lands) and Local Land Services.

Rather, we recommend that a single State Planning Framework should apply to all TSRs in NSW. It must provide clear and consistent guidance for developing regional management plans and local operational schedules. Management plans need to recognise both the broad landscape and localised values of the network and be developed in consultation with the broader community.

Recommendation 1: *Adopt a single State Planning Framework that applies to all TSRs in NSW, irrespective of which agency is responsible for the management of individual parcels of the network.*

2. Identify and conserve environmental, social and cultural values

It is important that any planning framework for the management of TSRs identifies the important environmental, social and cultural values of the TSR network and puts in place appropriate mechanisms for the protection for those values.

The draft Framework does not adequately explain the important environmental and cultural values of TSRs, or their state and national significance. Further background information could be provided to clearly identify these values within the management context of TSRs.

We are also concerned that the draft Framework fails to provide a basis for these values to be maintained and adequately considered in decision-making at the regional and local levels. TSR corridors and ecological linkages often extend beyond a single LLS region. The Planning Framework fails to recognise the landscape context of TSRs and does not provide for consideration of ecological values other than at a regional or local level.

Recommendation 2: *Ensure that any planning framework for TSRs clearly identifies the important environmental, social and cultural values of the TSR network and puts in place appropriate mechanisms for the protection of those values, including at state and national levels.*

3. Retain broadscale connectivity of the network

TSRs need to be managed in a way that recognises the broadscale connectivity of the TSR network, both in maintaining habitat corridors and traditional Aboriginal song lines.

As noted above, we recommend that a single State Planning Framework should apply to all TSRs in NSW irrespective of which agency is responsible for the management of individual parcels of the network.

There is a real risk that by adopting different management frameworks across agencies, the connectivity importance of the TSR network will be diminished. If existing corridors are poorly managed and broken up, then the TSR network will lose its important connectivity values.

Recommendation 3: *Adopt a single State-wide planning framework that provides management mechanisms for retaining broadscale connectivity of the TSR network*

4. Introduce an alternative funding model

The Planning Framework is based on cost neutrality (that is, full cost recovery). This risks economic considerations overriding social and environmental considerations. An alternative to the current funding model (which is based on rates and user fees) is required to administer the network in NSW and maintain the wide range of public benefits it delivers for future generations. Adequate public funding is necessary to supplement income generated from the rates and user fees.

Recommendation 4: *Adopt an alternative funding model for TSRs that includes public funding to supplement income generated from the rates and user fees.*

5. Moratorium on long-term grazing leases

There should be a moratorium on granting long-term grazing leases to prevent short term, ad-hoc decision-making and environmental degradation of the TSR network, until appropriate management frameworks are in place.

In recent years, there has been increasing pressure to manage TSRs solely for their grazing values, rather than their multiple values, which include nature conservation, Aboriginal cultural heritage and recreation. Increasingly, TSRs have been leased to landholders for permanent access through Annual Grazing Permits (which in some instances have been up to 3-year permits). Some reserves have been managed this way for a long time, but many reserves previously managed for 'walking' stock only are now being offered up for permanent grazing under 5-year grazing permits.

The change from occasional grazing to permanent grazing has the potential to degrade many of the environmental values of the TSRs, damage threatened ecological communities and destroy local populations of threatened plant species.

Recommendation 5: *Implement a moratorium on granting long-term grazing leases to prevent short term, ad-hoc decision-making and environmental degradation of the TSR network, until appropriate management frameworks are in place.*

6. Community Engagement

There are a broad range of stakeholders with an interest in the future management of TSRs, including:

- Conservation and environment groups
- Aboriginal traditional owners and Aboriginal Lands Councils
- Drovers and graziers
- Farmers and farmers associations
- Apiarists
- Tourists
- Recreational users including bushwalkers, bird watchers, recreational fishers, and horse riders

- Educators and Academics
- Historians, writers and artists

Key stakeholders, including community and conservation groups, must be identified in the draft Framework and adequately consulted in the development of methodologies underpinning the framework, and in the development of regional management plans and local operational schedules.

Recommendation 6: *Identify key stakeholders, including community and conservation groups, in the draft Framework and adequately consult stakeholders in the development of methodologies underpinning the framework, and in the development of regional management plans and local operational schedules.*

SPECIFIC COMMENTS ON THE NSW TRAVELLING STOCK RESERVES DRAFT STATE PLANNING FRAMEWORK 2016-19

In addition to the general feedback and recommendations outline above, we make the following specific comments on the draft Framework:

Rationale and Scope, and Mission Statement

- Section 1.1 should clearly explain that the LLS is required to manage Crown land, including TSRs, in accordance with the objects and principles of the *Crown Lands Act*.
- Section 1.2 refers to TSRs and ‘other Crown land’. It is unclear what ‘other Crown land’ is managed by the LLS, and whether the draft Framework applies to that other land.

Guiding principles

- The guiding principles identified at 1.3 refer to stakeholder values such as production; recreation; cultural heritage; and conservation uses. It is our view that the intrinsic values of Crown lands should also be identified in the guiding principles. As noted above, the TSR network has important environmental, connectivity and cultural values, which are not ‘stakeholder’ based values, but intrinsic values of the TSR network and landscape.

Assessment criteria for TSR classification

- We note that there is some inconsistency in the terminology used in the draft framework e.g. “assessment criteria for TSR classification” (p 7) and “methodology for determining primary use” (p 9). We understand that this is a drafting error and both references are to the same Assessment Criteria for TSR classification.
- We strongly urge the LLS to consult with key stakeholders, including community and environment groups, in developing the assessment criteria for TSR classification.

Uses and values of TSR and Crown land

- Part 3 of TSR framework is titled 'Uses and values of TSR and Crown Land', however it does not clearly identify 'values'. Rather, it seeks to identify various 'active' and 'passive' uses, with some values being identified as 'passive' uses. We are concerned that this model does not adequately allow for intrinsic values to be identified and protected in their own right.
- We see 'values' and 'uses' being separate, with 'uses' having potential to impact on 'values'. To this end, we suggest that this section should clearly identify 'values' as distinct from 'uses'. Some of the 'passive' uses, such as signage/advertising and passive recreation could be identified as 'non-agricultural uses', and environmental and cultural values should be identified separately.
- We understand that the land use matrix would need to be revised to reflect the distinction between 'uses' and 'values'.
- The LLS should undertake further consultation with key stakeholders, including environment and conservation groups, to finalise the primary land use categories, and the subsequent categorisation of land.

Consultation and liaison

- We suggest that the Framework should identify key stakeholders, including conservation and environment groups, Aboriginal traditional owners and Aboriginal Lands Councils, drovers and graziers, farmers and farmers associations, apiarists, tourists, recreational users including bushwalkers, bird watchers, recreational fishers, and horse riders, educators and academics and historians, writers and artists.
- The framework should provide clear guidance for future consultation, including in relation to the development of the assessment criteria for TSR classification, and on development of regional plans.
- Peak organisations can help identify relevant regional and local groups, and disseminate information.
- The LLS should not rely solely on the LLS Boards of each region to function as a conduit for community input. Feedback from our members suggests that some boards, which are dominated by rate payers, do not adequately represent the broader community interest. To that end, the LLS should identify and engage other key stakeholders.

Funding

- As noted above, we are concerned that the Planning Framework is based on cost neutrality. This risks economic considerations overriding social and environmental considerations.

- An alternative to the current funding model (which is based on rates and user fees) is required to administer the network in NSW and maintain the wide range of public benefits it delivers for future generations. Adequate public funding is also necessary to supplement income generated from the rates and user fees.

Monitoring and reporting

- We strongly recommend that the Framework include more detailed guidance on monitoring and reporting requirements, including timeframes and processes for monitoring and reporting.
- The Framework should identify specific outcomes that must be reported against.
- Monitoring and reporting should be transparent and information should be made publically available.

Long term grazing leases

- We repeat our earlier concerns that the change from occasional grazing to permanent grazing has the potential to degrade many of the environmental values of the TSRs, damage threatened ecological communities and destroy local populations of threatened plant species.
- There should be a moratorium on granting long-term grazing leases to prevent short term, ad-hoc decision-making and environmental degradation of the TSR network, until appropriate management frameworks are in place.

CONCLUSION

The Travelling Stock Reserve network (TSRs) provides key environmental, economic, cultural and social benefits to NSW. It is important that there is an overarching framework that provides clear and consistent guidance for managing and protecting those important values.

Specifically we make the following recommendations:

Recommendation 1: Adopt a single State Planning Framework that applies to all TSRs in NSW, irrespective of which agency is responsible for the management of individual parcels of the network.

Recommendation 2: Ensure that any planning framework for TSRs clearly identifies the important environmental, social and cultural values of the TSR network and puts in place appropriate mechanisms for the protection of those values, including at state and national levels.

Recommendation 3: Adopt a single State-wide planning framework that provides management mechanisms for retaining broadscale connectivity of the TSR network.

Recommendation 4: Adopt an alternative funding model for TSRs that includes public funding to supplement income generated from the rates and user fees.

Recommendation 5: Implement a moratorium on granting long-term grazing leases to prevent short term, ad-hoc decision-making and environmental degradation of the TSR network, until appropriate management frameworks are in place.

Recommendation 6: Identify key stakeholders, including community and conservation groups, in the draft Framework and adequately consult stakeholders in the development of methodologies underpinning the framework, and in the development of regional management plans and local operational schedules.

Please do not hesitate to contact Cerin Loane, Policy and Research Coordinator, on (02) 9516 1488 or cloane@nature.org.au for further information or assistance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kate Smolski', written in a cursive style.

Kate Smolski
Chief Executive Officer