



'Valley of the Bandicoots'

A project of the Aldgate Valley Landcare Group Inc.
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Adelaide Hills Council
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Attention: Roger Frinsdorf

Monday, July 5, 2004

Dear Roger

RE: MANAGEMENT PLANS FOR COMMUNITY LANDS

Pleased find enclosed an initial response from the Aldgate Valley Landcare Group to the 'Public Consultation Document' relating to Management Plans for Community Lands.

Given the short public consultation time, the vast number of properties involved, the complexities of the tenure boundaries in this area, our lack of access to the Council's records, and the fact that many plots of land and other environmental features have local names which do not appear on the Council documents, it is very likely that in this response we have over-looked some properties which are important to our project, and/or which have imperative conservation issues.

Therefore we reserve the right to make further submissions, and to hold a continuing dialogue with Council, about the status of these and other Community Lands. We hope that in the spirit of a continuing productive partnership the Council will be amenable to this approach – which may help overcome some of the short-comings of this inadequate process.

Although we believe the Council's approach to this process is flawed (see 'General Comments' below), we hope this submission will enable us to continue to work in a productive partnership with the Council, and that practical plans can be worked out for managing these and other environmental assets (perhaps within frameworks such as the new Central Hills Biodiversity Hot Spots project).

I also make the obvious point that our group has put in many thousands of volunteer hours enhancing and restoring the environmental value of many plots of Council land — and that we have done so only in the understanding that such land will be managed in perpetuity for its environmental value.

Yours faithfully

David Mussared
Chair, Aldgate Valley Landcare Group

(1) General comments:

Firstly we would like to express our disappointment in the Adelaide Hills Council's approach to meeting this legislation — opting for simplistic and inadequate 'generic' management plans for more than 300 individual properties in a single document, without any prior public consultation, and with no recognition of the long history of use (and, in many cases, pre-existing management plans) associated with many of the individual sites. This does not appear to us to meet the spirit of the 1999 legislation.

We are also disappointed at the extremely short public consultation period — the absolute bare minimum allowed under the legislation. Given that the legislation has been in force since January 2000, it seems to us to be extraordinarily unfair that the community is to be given just three weeks out of a four-year process to respond. When more than 300 properties are involved, many of which have community groups of various kinds associated with them, this is clearly inadequate — it does not even give enough time to inform all the relevant stakeholders that the process exists, let alone to have the necessary meetings required to compose a considered response for each site.

Indeed, the whole exercise appears to us to be a “quick and dirty” attempt to achieve technical compliance with the legislation, rather than a serious exercise in community land management. The document appears to be the result of a desktop database search based only on the information listed against the properties' titles, with no attempt to update the information according to subsequent agreements with the Council, history of use or other more relevant information.

An unfortunate side-effect

One unfortunate side-effect of the Council's approach to the Community Land Management process has been its (we hope inadvertent) effect of breaking up long-standing community projects which have worked — in some cases for many years — to integrate the management of conservation lands covering several titles under a single umbrella project (for example, the 'Stirling Linear Park' and the 'Valley of the Bandicoots' projects).

Such projects have been working with the best scientific advice available, in close consultation with all levels of government and with a close working relationship with the Adelaide Hills Council, to try and piece together conservation areas of sufficient size to restore natural ecosystem functions, often crossing many types of land tenures and involving complex management decisions. This integrated approach also brings with it considerable catchment improvement and other public benefits, and (as you would be aware) it is very much in keeping with the State Government's Strategic Plan, and with the Federal Government's approach to biodiversity and natural resource management.

Because of this integrated approach, many of the groups involved have received substantial State Government, Federal Government and private sector financial and other support (eg. Natural Heritage Trust and Catchment Board Grants, Green Corps and Youth Conservation Corps teams etc).

Disintegrating these projects back into their original constituent tenures — if it is pursued by the Council — will put at risk this financial and project support. More importantly, it will also put at risk the huge volunteer effort which now goes into managing such areas — groups such as ours are simply not prepared to undertake the vast amount of work we currently do on Council land if the Council does not offer long-term protection to the sites, which includes recognising the integrated nature of the projects.

We look forward to the Council's response to the public consultation process as evidence that the Council's intentions are honourable, and that the relationship of trust which is necessary in partnerships between groups like ours and the Council can be restored and enhanced.

A plea for recognition

One small, but important, measure the Council could take toward restoring community groups' faith in the partnership would be for the Council to recognise our projects by name for its planning purposes (ie: to refer in its official documents to the 'Stirling Linear Park' and the 'Valley of the Bandicoots' — both projects which have been strongly supported by the Council — instead of breaking them up on paper into their constituents. A clear reference in the Council's management plans that the relevant areas are being managed as part of these larger projects would provide some indication that the Council takes our projects seriously.

On a positive note, we hope that this exercise could provide an opportunity for the Council to open up a genuine dialogue with the various community groups it depends on to help manage its community lands. Certainly our group would welcome the opportunity to be full participants in refining existing management plans, and developing genuine new ones, for the areas over which we have an interest. We have always welcomed Council participation at our meetings, and we would warmly welcome a formal process under which we could be consulted on relevant issues (eg. weed management, bushfire management, road management, cemetery management) ahead of any decisions being made and works being undertaken.

We believe the generic management plans for each category — but particularly for the Category 1 'Conservation Reserves' — should include the proviso that management of such lands should be in close consultation with local community environment groups ('Friends' groups, landcare groups, catchment care groups etc.) who have a demonstrated interest in management of the affected land. We also believe management of such areas should also be conducted in accordance (and consultation) with catchment-wide bodies such as the Catchment Water Management Boards and the Integrated Natural Resource Management Board.

We suggest that our Valley of the Bandicoots project and the Stirling Linear Park (both of which have been strongly supported by the Council) offer suitable planning frameworks for all of the Council-owned conservation areas which fall within their respective project areas. Unfortunately the considerable management planning which has already been undertaken for both of these projects (encompassing the Council land parcels associated with them) does not appear to be recognised in the Public Consultation Document.

Similarly we suggest that the new ‘Central Hills Biodiversity Hot Spots’ project (now in the final stages of negotiation, and which also has the strong support of the Council), may offer a suitable planning framework on a larger scale for many other Council-owned conservation areas in the Central Hills region.

We believe the value of an extensive network of conservation reserves (particularly when the reserves are managed in an integrated way) is immeasurable. Among many other things, conservation areas are vital for water catchment protection, biodiversity conservation (flora, fauna and ecosystems), as protective buffers, for cultural heritage and educational reasons and for their sheer beauty and fascination. Yet our area of the Hills has been cleared of an estimated 90 per cent of its original bushland, and most of what is left is severely degraded and broken into unsustainable fragments.

Our task as a landcare group – with the help of the Council and many other bodies – has been to try to stitch those fragments back together into a workable whole, and to reverse the degradation at all levels. We have had some notable successes with this, and we look forward to continuing our endeavours, with the Council’s continuing support. We believe we do important work.

(2) Detailed responses for individual properties

To make identification simpler, we have listed the properties under the categories to which they have been assigned in the 'Public Consultation Document', even though these are clearly erroneous in many cases. We have also used the addresses and property names used in the 'Public Consultation Document', even though these are also inaccurate in some instances.

'Conservation Reserves' category:

The following properties are correctly recorded in the Public Consultation Document as being in the 'Conservation Reserves' category. All four are integral components of the Valley of the Bandicoots project, and have been managed in partnership with the Council as conservation reserves for some years.

'Reserve' 1 Shanks Road, Aldgate:

'Vacant land' 1a Shanks Road, Aldgate:

'Vacant land' 96 Aldgate Valley Road, Aldgate:

The three properties above were joined together into a single conservation reserve – the Aldgate Valley Reserve – about six years ago, by a decision of the Adelaide Hills Council. The Aldgate Valley Reserve is an integral component of the Valley of the Bandicoots project.

We were surprised (and distressed) to find these properties listed as separate land parcels in the Public Consultation Document. The Aldgate Valley Landcare Group has put in some thousands of hours of volunteer labour at this site (with considerable support from the Adelaide Hills Council and other agencies) because of its conservation value. We have also recently finalised a management plan for the site, in consultation with the Onkaparinga Catchment Water Management Board (which has agreed to fund part of the necessary weed management at the site).

Given the complex negotiations which surrounded the creation of this Reserve (which involved a title swap and Land Management Agreement with a private landholder and many other elements, and included an assurance by Council that the whole area was to be managed in perpetuity as a conservation reserve) it is very troubling to us to find the Reserve has been broken up into its historical constituent parts, and a large part of it listed simply as 'Vacant Land'. It is worth noting that the Council itself has signposted the site as a single conservation reserve.

There is an urgent need for the Council to amend its records to clarify that these three titles comprise the single entity 'Aldgate Valley Reserve', and that it is all to be managed in perpetuity as a conservation reserve.

'Closed Road', 6 Shanks Road, Aldgate:

Number 6 Shanks Road is a private house, not Council land. We think this reference must be to 'Shanks Reserve' – a conservation reserve next door (we are not sure why it is referred to as a 'Closed Road'). Shanks Reserve is a rare example of very good

quality remnant vegetation, and is an integral component of the Valley of the Bandicoots project.

We strongly recommend the Council should amend its records to clarify that this land is an important conservation reserve, and that it should be managed in perpetuity as such.

‘Passive Recreation Reserves’ category

The following properties are incorrectly listed in the Public Consultation Document as ‘Passive Recreation Reserves’. If we have identified them correctly, all are unarguably conservation reserves, and should be transferred to the Conservation Reserves Category.

Reserve, Aldgate Valley Road, Mylor:

We believe this must be a reference to the ‘Stone and Water Reserve’ on Aldgate Valley Road. This is a conservation reserve (and has long been recognised as such) which includes a significant reach of Aldgate Creek, stands of high quality native vegetation, and which is also almost certainly habitat for the Southern Brown Bandicoot. It has no history of use for any kind of recreation, and has no public access or paths. This Reserve is also an integral component of the Valley of the Bandicoots project.

We strongly recommend the Council should transfer this land to the ‘Conservation Reserve’ category, and should manage it in perpetuity as a conservation area.

Land, Kyle Road, Mylor:

We believe this must be a reference to the conservation reserve which runs between the Kyle Road Reserve and the ‘Stone and Water Reserve’ (see above). This land was specifically set aside by the Council as a conservation reserve (following a title swap about 16 years ago) because of the superlative quality of its native vegetation.

Allowing any kind of recreation on this property would be an environmental tragedy (and also quite dangerous, because of the terrain). There are no paths through this property, and very few weeds. It remains one of the few truly pristine areas of native vegetation in the central Adelaide Hills. This Reserve is also an integral component of the Valley of the Bandicoots project.

It is imperative that this property is reclassified as ‘Conservation Reserve’, and that it be managed in perpetuity as a conservation area.

Camp Gooden Reserve, Leslie Creek Road, Mylor:

Camp Gooden Reserve, Leslie Creek Road, Mylor:

Our understanding is that these two Reserves were created specifically as conservation reserves, following negotiations over the sale and sub-division of Camp Gooden.

These two reserves lie at one end of the Valley of the Bandicoots wildlife corridor, and are contiguous with it. They also abut the Mylor Parklands, and provide a precious link between the bushland of Aldgate Valley and large areas of bush stretching through Mylor and beyond.

We recommend that both these reserves should be transferred into the ‘Conservation Reserves’ category, and that the Mylor Parklands Bushcare Group should be closely consulted about their management (the Mylor Parklands Bushcare Group will be much more knowledgeable than our group about these reserves).

‘Community Use’ category:

Reserve, Aldgate Tennis Club

We are not sure how extensive this reserve is. We agree that the Tennis Courts area should be used for sport and recreation, but the surrounding bushland (which we believe is contiguous with both the Valley of the Bandicoots project and the Mylor Parklands) should be managed for its conservation value. As with the Camp Gooden sites, the Mylor Parklands Bushcare Group will be much more knowledgeable than our group about this area.

The Council recently helped us erect a Valley of the Bandicoots sign on this site (because it marks one end of our project area).

Woorabinda Reserve, Stirling

Placing Woorabinda Reserve in this category is clearly a mistake. Woorabinda Reserve (along with the rest of the properties which make up Stirling Linear Park) has been managed for a generation as a conservation reserve, in a partnership between the Friends of Stirling Linear Park, the Adelaide Hills Council and various other parties.

Given that the Council agreed as recently as May 28 to an independently facilitated process to revise the long-standing Management Plan for this reserve — and made it clear that conservation would remain the primary imperative for the reserve — we believe that this reserve should be transferred into the Conservation Reserve category (along with all the other land parcels which make up the Stirling Linear Park — it is not clear to us from the descriptions in the Public Consultation Document which parcels of land are involved).

Placing any part of Stirling Linear Park in any category other than Conservation Reserve would be seen by the hills environmental community as a gross betrayal of trust to the volunteers who have been working on the site for more than 15 years. It would also involve the Council reneging on the intention of the many conservation grants and other public support which have been accepted over the years to manage the Stirling Linear Park.

It is imperative that all parcels of land associated with Stirling Linear Park are transferred into the Conservation Reserves category.

‘Recreation & Sport’ category

Reserve, Hender Reserve, Heathfield:

Placing this reserve in the category 'Recreation and Sport' is another clear mistake, which needs to be rectified immediately. It would be provocative in the extreme to leave Hender Reserve in this category, when its value for biodiversity conservation is so well-documented. It is an integral part of the Stirling Linear Park, and it needs to be recognised as such – and the Friends Group associated with Stirling Linear Park needs to be reassured that their many years of excellent work is valued by the Council and community.

As with Woorabinda Reserve (see above) it is imperative that all parcels of land associated with Stirling Linear Park are transferred into the Conservation Reserves category.

'Civic Purpose'

Cemetery, 130 Strathalbyn Road, Aldgate:

There are two distinct parts to the Cemetery land — the area used for graves (which is largely cleared), and the larger bushland conservation area marked off in most parts by permapipe barriers.

This bushland is of very high environmental value due to its flora and fauna, and it is an integral and critical component of the Valley of the Bandicoots project. For the past six years the 'Friends of the Stirling Cemetery Bush' (now a sub-group of the Aldgate Valley Landcare Group) has been holding working bees on this site, with the full support of the Council.

We have had a working agreement with previous Councils that the area behind the permapipe barriers is to be set aside for conservation, while the cleared areas inside the barriers can be developed for grave sites.

The Stirling Cemetery Bush includes some areas of almost pristine native vegetation — partly due to many years of laborious weeding by our group. It also includes some weedy areas (some of these have been deliberately left weedy because they provide habitat for a known and long-standing population of Southern Brown Bandicoots). Our group works in the Cemetery Bush once a month, and parts of the site are now an impressive showcase of what can be achieved to restore native bushland.

Because the Stirling Cemetery Bush is the only sizeable block of native vegetation in the immediate area, we have gone to great lengths to link it to other remnant vegetation patches using a network of plantings and bush rehabilitation on road verges and Road Reserves, and also on private land. More than 9,000 tubestock have been planted in the past two years to link the Stirling Cemetery Bush to the larger Valley of the Bandicoots wildlife corridor, as well as enormous amounts of bush rehabilitation and other works on nearby private properties. A great deal of grant funding, private sponsorship, volunteer effort, work by Green Corps and Youth Conservation Corps has gone into achieving this goal.

We believe the Council should now formally acknowledge the environmental values of the Stirling Cemetery Bush site, and should transfer the bushland area into the 'Conservation Reserve' category, to be reserved in perpetuity for its environmental

values. We have repeatedly indicated our willingness to be involved in any planning processes affecting the site, and have asked to be consulted about its management. We believe there are some positive opportunities to integrate the environmental values of the site with its cemetery values — as a site which has both very significant cultural heritage and very significant natural heritage.

Candlebark Reserve, Aldgate:

‘Civic Purpose’ seems to be an odd category for this reserve, which is basically a small recreation reserve, with some biodiversity values. There is an active group of local residents involved in this reserve: we believe they should be contacted and consulted about it being placed in this category.

Missing links: ‘Road Reserves and Road Verges’

We have added this category, because there is one glaring omission from the ‘Community Lands’ document – the large number of unmade (or part-made) Road Reserves and vegetated road verges which are scattered through the Adelaide Hills. Many of these have taken on major conservation significance in their own right (often they are the only areas which have not been cleared), and many also provide critical links between other fragments of remnant native vegetation.

We have listed below only those Road Reserves and Road Verges which are directly part of our Valley of the Bandicoots project. All these reserves are critical links in our project — they provide the ‘backbone’ of our wildlife corridor, and we have put a huge amount of work into rehabilitating and replanting many of them.

We recommend that the Council should explicitly recognise the conservation value of these Road Reserves and verges (and of others with similar values), giving them the status of reserves in perpetuity.

Cambridge Road verge:

The road verges along the unsealed section of Cambridge Road are crucial links in the Valley of the Bandicoots project. We have put a major effort into removing weeds from this area, and into re-planting the verges with native vegetation (in association with similar weed removal and planting on the adjoining private properties, all of which are active participants in the Valley of the Bandicoots project). The use of the Cambridge Road verge as a conservation link has been one of the outstanding community successes of our project, and the involvement by adjoining residents in integrating their environmental efforts has been inspirational.

Recently the Council helped us to erect a ‘Valley of the Bandicoots’ sign at the Oxford Road end of Cambridge Road. It marks the start of our Valley of the Bandicoots wildlife corridor.

We would like to see the Cambridge Road verge given conservation status in the Council’s planning process, and we would like to participate in any decision-making about its future. It is also well-known that both our landcare group and all the Cambridge Road residents would like to see this road closed to through traffic (for a

whole range of reasons). We intend to approach the Council with a formal proposal to achieve this in the near future.

Blackwood Lane:

This firetrack is also a crucial link in the Valley of the Bandicoots project, and we have conducted a large amount of manual weed-clearing and revegetating (in consultation with various Council officers). We are pleased that the Council has now placed a traffic barrier to halt through traffic on Blackwood Lane. There have been some reports of bandicoot activity along Blackwood Lane (and the properties adjoining it) but this has yet to be confirmed. As with Cambridge Road, we believe Blackwood Lane should be given formal status as a conservation area.

Dalton Avenue:

The unsealed section of Dalton Avenue (and the private land held under a Land Management Agreement which marks its former continuation) is another critical link in the Valley of the Bandicoots project, providing a continuous vegetated corridor from Cambridge Road to the Aldgate Valley Reserve. Some volunteer work has gone into maintaining and improving the vegetation along this no-through track, but much more needs to be done.

Shanks Road verge:

Some parts of the Shanks Road verge are critical to our Valley of the Bandicoots project, providing links between the Aldgate Valley Reserve, Shanks Reserve and the Brogan Place/Kyle Road Reserve.

Brogan Place:

The section of Brogan Place we are most concerned about is the unmade Road Reserve which is a continuation of Blackwood Lane (on the other side of Aldgate Valley Road) and which crosses Aldgate Creek. We have done quite a bit of weeding at different times in this area, and also (more recently) some planting. Brogan Place is a critical link between various bushland rehabilitation projects on private land along Blackwood Lane and Kyle Road Reserve (and Nurrutti Reserve).

Kyle Road Reserve:

We believe Kyle Road Reserve is one of the most important environmental sites in the Aldgate Valley area. It supports Southern Brown Bandicoots along much of its length, and it adjoins (and links together) many large private and public areas of bushland (eg. Nurrutti Reserve, Warrawong Sanctuary, the Stone and Water Reserve and two unnamed Council reserves, as well as large areas of vegetation on private land, some of which is under Heritage agreement).

Kyle Road Reserve also includes some very high quality areas of remnant bushland in its own right (it has provided much of the seed source for our plantings throughout the Valley of the Bandicoots project). Considerable volunteer work has gone into some areas of the Road Reserve over many years, and also into some of the adjoining land.

Conservation of the Kyle Road Reserve is vital to the Valley of the Bandicoots project, and the 'Friends of Kyle Road Reserve' was recently welcomed as a new sub-group of the Aldgate Valley Landcare Group.

We would like to see all of the road reserves and verges named in this submission given permanent conservation status, but the issue is most critical for the Kyle Road Reserve.

Stephens Road:

The road verges on Stephens Road are important habitat for a known population of the Southern Brown Bandicoot, and comprise an important link between several properties being managed for their bushland qualities. Stephens Road is also connected to the Valley of the Bandicoots project.

Stock Road

The road verges on Stock Road (where it meets the Kyle Road reserve, but also further along) include some areas of very good bush, including an active Bush for Life site.

We know we have missed some:

There are some conservation areas which we know exist in our direct area of concern, but which we simply cannot identify from the 'Public Consultation Document' (such as an un-named Council-owned conservation reserve which lies between the Kyle Road Reserve and Stock Road, and which is also an integral part of the Valley of the Bandicoots project).

We are also aware of many other reserves in surrounding areas, which do not impinge on the established integrated projects named above (Valley of the Bandicoots, Mylor Parklands, Stirling Linear Park etc). We are also concerned about these, but we simply do not have the time or resources to track them all down from the Council's document and make an assessment of the relevance of the generic management plans to them.

In general, we would urge that any community land should be assessed for its conservation value before any final management plan is set in place, and that such assessments should include the value of the properties as environmental links as well as for their own sake. Within reason, we would be happy to lend our expertise to such assessments.

If you have any questions about this submission, please contact David Mussared, Chair, Aldgate Valley Landcare Group, 8388-5608.