



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

30 January 2022

Planning Officer
Botanic Gardens and Parks Authority
Kings Park WA 6005

Re: **Draft Bold Park Management Plan 2022–2027**

The Wildflower Society of WA (WSWA) is pleased to have the opportunity to provide comment to the Botanic Gardens and Park Authority (BGPA) on the Draft Management Plan (the Plan) for Bold Park, one of Perth's most important conservation areas, for the next 5 years.

Document Structure

Overall, the document appears to lack an identifiable flow that links legal requirements and definitions through strategies, risks and objectives to plans, targets, actions, resourcing and funding with a final description of measurable outcomes to enable the plan to be audited and achievement against the plan reported.

Governance

Funding arrangements

No detail is provided on whether current and or future funds are sufficient for the planned activities. The amount of work required appears to be growing each year (e.g. mitigating threats such as weeds and dieback, increased visitation) yet there, concurrently, appears to be a decreased presence of BGPA staff at the Park and more reliance on volunteers as the 'real' budget declines as no provision appears to be made for increases in costs and wages. While the Plan provides a link to BGPA's annual budget reports, these do not provide specific details on how funds are to be spent in the management of Bold Park. Details of expenditure and in turn personnel required to conduct the outlined activities should be given in the Plan.

Planning framework and policies

Policies

No mention is made of Bold Park being both a Bush Forever site and an A Class reserve. Both these designations carry their own sets of associated policies (e.g. the 2000 Bush Forever policy, replaced in 2010 by State Planning Policy 2.8 Bushland Policy for the Perth Metropolitan Region, and the Land Administration Act 1997). These designations and associated policies reflect that the main focus of Bold Park is and should be conservation. The Policies section of the Plan should be updated to include these designations and policies and hence, reinforce the conservation paradigm in which the Plan must sit.

BGPA strategic priorities

While the Themes and Goals outlined are commendable and many are required for the success of Bold Park, the first listed should be the Science and Conservation theme. This would yet again reiterate the centrality of conservation to the Plan. Without being able to "protect local biodiversity and tackle complex environmental challenges" the other Themes and Goals are not possible.



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Movement of people

Movement of the public within the park should be limited to foot traffic with the exception of parking areas around the periphery where vehicles could be parked for start/end of people transit within the park. The mix of wheeled traffic (with the exception of wheelchairs) and pedestrians leads to adverse interaction between people and wheeled vehicles, particularly where pedestrians are focussed on observing the natural beauty adjacent to walkways. Our members report challenges when cycling through other parks, including Kings Park, as pedestrians often are not aware of bicycles and other wheeled vehicles, such as e-bikes and electrically powered scooters, when observing nature. In addition these vehicles, when used for commuting or exercise, travel at speeds that exceed the limits required to stop or warn pedestrians of their presence. They can also injure or kill wildlife when collisions occur.

Planned activities

The key management activities pertaining to Science and Conservation should be listed first to set the agenda for the rest.

Using Science and Conservation as an example, we find that there is little specific detail given for the majority of the key management initiatives. While they cover some major concerns of the WSWA (e.g. restoration, fire) there is virtually no detail on how these initiatives will be achieved. We ask that concrete examples be included in the plan, particularly if this is the only occasion for stakeholders to comment.

For example, initiative 3.3 reads: "Prepare a long-term Bushland Conservation Plan for Bold Park to guide integration of scientific research with adaptive management of Bold Park Bushland for its ongoing conservation. This includes undertaking research to address knowledge gaps for bushland management, biodiversity conservation and ecological restoration, and building on our ecological records of local biodiversity". The draft management plan should include such conservation plans. What is meant by bushland management? One would assume that this would include, as an example, reducing weeds (a major issue in the park). Target weed species should be listed, and reduction and eradication actions listed.

As another example, initiative 3.7 reads: "Manage risks in Bold Park, including risks associated with trees, fire, erosion, biosecurity and visitor access, for community safety, protection of park assets and to conserve native biodiversity in the bushland". We assume that, as an example, biosecurity relates to weeds, dieback and other diseases etc. Reducing biosecurity risks could be achieved by the removal of horse access to the Park. Again, such specifics of the management of these risks should be listed in the Plan so that comment by stakeholders can be made and the best approaches integrated.

Cleared areas could also be used for Science and Conservation as they offer the opportunity to demonstrate bushland restoration techniques and train volunteers in bushland restoration as well as coastal dune restoration.

WSWA specific contributions to the management of Bold Park

Below we outline ways in which the WSWA could directly contribute to the management of Bold Park.

Promoting native horticulture in domestic gardens (p 16)



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Further development of the Perry House gardens using local species presents an opportunity for the WSWA to conduct such promotion.

Key management initiatives 1.3 and 1.6

“Maintain, enhance and develop relationships with **not-for-profit and community organisations** to facilitate the continuing conservation, presentation and celebration of the natural and cultural values of Bold Park and biodiversity conservation values more generally” and “Undertake community engagement and strategic partnerships with State and local government, and **not-for-profit and other organisations** to promote native flora conservation outcomes and to increase native flora use in landscapes outside Bold Park”.

The WSWA is able to contribute to both these initiatives as part of its lease obligations; specifically item 9: *“As part of its consideration and to offset the full commercial rent that would otherwise apply, the Lessee will provide the following services:*

- *Organised activities in Bold Park such as flora workshops, guided flora walks, lectures or other presentations related to the Land’s flora, involving the general community and members of the Wildflower Society on a minimum of four occasions each year as requested by the Authority, or otherwise as agreed between the Parties; and*
- *Provision of volunteer support for Bold Park, assisting in monitoring and plant identification relevant to BGPA Bushland coordinated through the Authorised Representatives;...”*

Key management initiatives 4.3

“Undertake a master planning process for the **Western Australian Ecology Centre precinct** to become a visitor gateway for Bold Park and a community engagement hub, including new facilities for community groups and improved public amenity”

As part of the precinct, Perry House could be made more visible to visitors through permanent signage and an entry statement including landscaping of the surrounding formal gardens with native species.

The Society reiterates that the purpose of Bold Park is conservation of its flora and fauna and this should remain the priority theme of this management plan. Other themes should be bounded in their scope by this theme. The Society would suggest that funding directed to conservation of flora and fauna should take precedence over funding of other activities, including recreation.

Thank you once again for the opportunity to comment on such an important document. The WSWA is happy to discuss further any of the issues raised.