26 October 2026

Submission on the Manning Park Trails Rehabilitation Plan

To: City of Cockburn
Consultation: Manning Park Trails – Proposed Trail Recommendations and Rehabilitation Actions
Closing date: 4 November 2026
https://comment.cockburn.wa.gov.au/manning-park-trails

1. Introduction and overall position

The Urban Bushland Council WA (UBC) welcomes the opportunity to comment on the City of Cockburn's proposed Manning Park Trails Rehabilitation Plan.

UBC recognises Manning Park Ridge as an irreplaceable remnant of the Swan Coastal Plain's natural heritage, supporting significant biodiversity, native vegetation communities, fauna habitat and important ecological connections within an increasingly urbanised landscape.

Of particular significance is the presence of the **Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion**, listed as Critically Endangered under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and corresponding to a Critically Endangered Threatened Ecological Community in Western Australia.

UBC supports the City's recognition that the extensive informal trail network has contributed to vegetation loss, habitat fragmentation, erosion and other environmental impacts. We welcome the proposed closure of 66 trails and the accompanying rehabilitation measures as a significant step towards improved management.

However, UBC considers that the final trail network must be determined by the ecological requirements of the reserve, not principally by existing patterns of recreational use.

The first question is whether continued use of a trail is ecologically compatible with the protection and recovery of the Critically Endangered Honeymyrtle Shrubland and other significant biodiversity values. Where compatibility cannot be demonstrated, conservation must take precedence over recreational preference.

Our position is summarised by three principles:

Protect first. Consolidate access. Restore what is damaged.

2. Apply avoidance first

Avoiding environmental harm must be the starting point for all decisions concerning trail retention, closure or formalisation.

The Commonwealth's *Approved Conservation Advice for Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion* (2023) recommends preventing further damage, avoiding new trails and rehabilitating existing informal trails through the ecological community.

UBC considers that Council should apply these recommendations directly when determining the future trail network.

Importantly, the distinction between formal, semi-formal and informal trails is not itself a measure of ecological acceptability.

A long-established track may continue to cause vegetation loss, weed invasion, disturbance and fragmentation. Formalising such a track does not remove its environmental impacts.

UBC recommends that every trail proposed for retention within or near sensitive vegetation be assessed against the requirement to avoid environmental harm to the maximum practicable extent.

3. Protect threatened biodiversity and ecological connectivity

The Critically Endangered Honeymyrtle Shrubland must be treated as a primary conservation constraint, not simply one of several competing land-use considerations.

The protection of this ecological community also requires protection of the ecological processes and surrounding vegetation that support its long-term persistence.

This includes adjoining native vegetation, suitable buffers, habitat connectivity, natural recruitment and ecological interactions involving flora and fauna.

Manning Park also supports other significant environmental values, including Tuart woodland and forest, black cockatoo habitat, priority flora and fauna habitat.

UBC emphasises that fragmented urban bushland retains considerable conservation importance. Small remnants and connecting vegetation can perform essential ecological functions despite the pressures imposed by surrounding urban development.

Trail management must therefore protect not only individual vegetation patches, but also their ecological integrity, connectivity and capacity for recovery.

The Commonwealth Conservation Advice recommends substantial buffers around Honeymyrtle patches. These should inform trail assessments, with local ecological circumstances determining the appropriate protection measures.

4. High recreational use must not justify environmental harm

UBC is concerned that established patterns of trail use may influence decisions to retain tracks that are ecologically unsuitable.

The Trails Audit identifies walking and running as predominant uses across much of the existing network. While this information is valuable for understanding recreational demand, it does not demonstrate that continued use is environmentally sustainable.

High use is not an argument for retention.

Indeed, high recreational use through fragile vegetation may increase the urgency of management intervention.

The frequency of trail use, its popularity on recreational mapping applications, or its perceived importance to particular user groups should not outweigh evidence of environmental degradation or risks to threatened biodiversity.

UBC supports recreational opportunities in Manning Park where they are compatible with conservation objectives. This requires a smaller, clearly defined, appropriately located and effectively managed trail network.

5. Assess cumulative impacts across the entire ridge

Trail impacts must not be assessed solely on a track-by-track basis.

The combined effects of numerous tracks crossing a restricted vegetation community may be significantly greater than the apparent impact of any individual track.

Cumulative impacts include loss of vegetation, habitat fragmentation, increased edge exposure, weed invasion, erosion, disturbance to fauna and reduced opportunities for natural regeneration.

The Rehabilitation Plan proposes retaining 56 trails, representing approximately 76% of the existing network by area.

UBC considers that this substantial retained footprint warrants a clear ecological justification.

Council should demonstrate that the retained network as a whole will achieve a measurable improvement in ecological condition and will not perpetuate unacceptable disturbance to the Critically Endangered ecological community or other conservation values.

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6. Rehabilitation must deliver genuine ecological recovery

UBC supports the proposed rehabilitation of closed trails but emphasises that closure alone does not constitute ecological restoration.

Effective rehabilitation may require physical barriers, weed management, erosion control, locally appropriate revegetation, protection of regenerating vegetation and ongoing surveillance.

The goal must be to restore ecological function, not simply remove a track from the recreational network.

UBC also cautions against treating revegetation or restoration elsewhere as compensation for continuing damage to the Honeymyrtle Shrubland.

The Commonwealth Conservation Advice identifies avoidance of further damage as the priority and states that offsets are not suitable for this ecological community.

Rehabilitation should address existing degradation, not be used to justify avoidable new or continuing impacts.

7. Transparency, participation and accountability

UBC welcomes Council's public consultation and its acknowledgement that the consultation is not a community vote.

Decisions affecting a Critically Endangered ecological community should be based on the best available ecological evidence, with genuine consideration of community knowledge and expert advice.

UBC considers that the final decision-making process should clearly explain the ecological justification for each trail proposed for retention, particularly where trails intersect or adjoin threatened vegetation.

Where significant environmental uncertainty remains, Council should adopt a precautionary approach and undertake additional assessment before approving continued recreational access.

The final Rehabilitation Plan should include clear management responsibilities, implementation timeframes, measurable ecological performance indicators and publicly available monitoring results.

8. UBC's recommendations

UBC requests that the City of Cockburn:

1. **Adopt avoidance of environmental harm as the primary decision-making principle**, particularly in relation to the Critically Endangered Honeymyrtle Shrubland.
2. **Review all trails proposed for retention within or adjoining threatened ecological communities**, including their ecological buffers, and demonstrate that continued use is compatible with their protection and recovery.
3. **Reject high recreational use, historical use or informal trail popularity as sufficient justification for retention** where significant environmental impacts occur or are likely.
4. **Assess cumulative impacts across the entire trail network**, including effects on vegetation condition, fragmentation, fauna habitat and ecological connectivity.
5. **Consolidate recreational access onto an ecologically appropriate network**, while maintaining essential emergency and infrastructure access under management arrangements designed to minimise environmental disturbance.
6. **Close and actively rehabilitate environmentally damaging informal and semi-formal trails**, using appropriate physical protection, weed control, erosion management and ecological restoration techniques.
7. **Publish the ecological rationale for trail retention and closure decisions**, including relevant mapping, conservation constraints, assessment criteria and the treatment of environmental uncertainties.

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8. **Commit to enforceable and measurable rehabilitation and conservation outcomes**, supported by adequate resources, defined responsibilities, ongoing monitoring, adaptive management and public reporting.

9. Conclusion

Manning Park Ridge is not simply a recreational landscape. It is a significant remnant of the Swan Coastal Plain's ecological heritage, containing biodiversity values that are increasingly rare and, in some cases, critically endangered.

The objective of trail management should not be to preserve as much of the existing recreational network as possible. It should be to establish the level and location of access that the environment can sustain without further compromising its ecological integrity.

UBC recognises the importance of community enjoyment of natural areas and supports appropriately managed access. However, recreational preferences must be accommodated within the ecological limits of this conservation landscape.

A trail's popularity does not establish its environmental suitability. Its continued use must be justified by evidence that the ecological values of the reserve will be protected.

UBC urges the City of Cockburn to make the protection and recovery of threatened biodiversity the defining objectives of its final decision.

Protect first. Consolidate access. Restore what is damaged.

Urban Bushland Council WA

References

1. Department of Climate Change, Energy, the Environment and Water (2023). *Approved Conservation Advice for Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion*. In effect from 15 November 2023, particularly Sections 2.2.1.3, 4 and 5.4.
2. City of Cockburn (June 2026). *Manning Park Trails Rehabilitation Plan*, particularly the Executive Summary, Threatening Processes, Trails Audit Report Findings, Recommendations and Implementation.
3. Natural Area Consulting Management Services (2025). *Manning Park Trails Audit, Categorisation and Mapping Report*.
4. City of Cockburn (2026). *Manning Park Trails* public consultation, 25 September–4 November 2026.
5. *Environment Protection and Biodiversity Conservation Act 1999* (Cth).
6. *Biodiversity Conservation Act 2016* (WA).

Thank you for the opportunity to comment.

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