**Comments on stage 2 of the Parks Masterplan**

Thank you for the opportunity to comment on this updated draft. I have responded to the on-line survey, however as noted in my response I wish to give a qualified response to a question which I could not answer with a simple yes / no and raise some additional points that I could not cover in my survey answers.

Question 22 - is the masterplan was on the right track?

If I had to respond in yes/no terms to question 22 my answer would be no. However, this would not give justice to the significant work and massive improvement from the previous consultation document.

I noted in the survey that I am greatly relieved that the department has responded to community submissions and prioritised protection and conservation. However I believe the consultation documents in themselves do not constitute or go close to a draft masterplan. Rather as its stands these set the vision, strategies and targets necessary in order to establish a masterplan, but in themselves do not constitute a masterplan.

While the gendered term "Masterplan" is distasteful, I firmly believe the intention to produce what is commonly understood by a masterplan is a good and necessary one.

A masterplan for parks needs a spatial component in order to give the public some sense of WHERE and WHAT, at least at a conceptual level, is to be included and a sense of cost implications. A quick scan of planning documents entitled 'masterplan' shows that this is what is normally contained in masterplans.

Far more work and time on consultation on the masterplan specifics are needed, including a map, at least at a conceptual level. This will allow the community to properly grapple with what is planned, and to understand the actual costs and benefits of the masterplan.

The public is entitled to access this level of information and understand its cost implications before signing off on a masterplan. As a user of parks who values conservation at present I have no idea whether the places I care about most will be included or safe under this document. This information is also needed for the NTG to be transparently accountable during implementation of the masterplan.

This process should be expected to take several years, and broadly aligns with the commitment on page 41 that "By 2027, regional spatial planning is conducted with Traditional Owners and Native Title holders, landholders and key stakeholders to develop a strategy for the establishment of new parks and reserves".

I also recommend the eventual masterplan should be recognised in legislation to ensure it is supported over its nearly thirty year horizon.

***I recommend the guiding statements in this documents be used to develop an actual masterplan that meets general understandings of the term over a realistic timeframe to produce a masterplan of substance by 2027 with legislated backing.***

Sufficient public funding is justified and will realise a public benefit

I am concerned that the masterplan does not appear to be sufficiently focused on the substantial increase in public funding which is clearly warranted and supported by the strong public response.

I am also concerned that the statement "Apply revenue models that will secure long term stable resourcing and funding for the operation of the parks estate" is unclear. It does not communicate exactly how this plan will be funded and could become a trojan horse for allowing incompatible activities and compromising the public interest.

I strongly support significant capital appropriations, as well as appropriate ongoing operating funds, to realise an ambitious parks masterplan. I firmly believe these will realise a massive long-term public benefit and should be funded from the public purse.

The operating budget and capital needed to deliver a great parks estate needs to be communicated upfront as part of the masterplan and this should be budgeted.

Opportunities to realise the intentions of the Territory Parks and Wildlife Conservation Act 1976.

The Parks Act is more expansive in its reach than just the Parks estate. I would like to see all aspects of land management needed to realise its intentions covered in the masterplan, including ensuring decisions outside of parks areas that reflect intentions within parks estate.

My work as administrator of the community group *Letters for the Environment Central Australia* has focused on key threatening processes such as invasive species, degradation of water quantity and quality, clearing, greenhouse gas emissions and mining.

It is clear that decisions made on other types of 'managed' land in the NT are/could have massive deleterious impacts on the parks estate e.g. allowing invasive weeds such as buffel grass to spread unchecked, and changes to the quality, amount and flows of water sustaining our precious rivers which are the centrepieces of many great national parks such as Finke Gorge National Park, Elsey National Park (Roper) and Giwining/Flora River Nature Park. To ensure parks such as these' lasting health I would like to see a far greater coherence between catchment wide land and water management and the place specific protections which this document seeks to establish. The conservation estate is for everyone and should be prioritised over individual short-term interests where these impinge on parks.

Thank you for your time and the opportunity and demonstrated willingness to respond to community feedback.

I would be delighted to contribute further in this process.

Regards

Jacqueline Arnold