

# Leeuwin-Naturaliste capes area parks and reserves

Analysis of public submissions  
to the  
draft management plan 2010

Department of Parks and Wildlife  
for the  
Conservation Commission of Western Australia

## OVERVIEW

This document is an analysis of public submissions to the *Leeuwin-Naturaliste capes area parks and reserves draft management plan 2010* (draft plan) (DEC 2010). It presents key issues and themes that arose from the submissions and explains how these issues have been addressed in the final plan.

The draft plan was released for public comment by the Conservation Commission of Western Australia from 10 December 2010 to 18 February 2011.

The Leeuwin-Naturaliste capes area is subject to intense community interest in how it is managed, both locally and further afield. As such, a communication strategy was developed and implemented to promote the release of the draft plan for public comment. The strategy included:

- a notice of the plan's release published in the *Government Gazette* on 10 December 2010\*
- advertisements in two editions of *The West Australian* newspaper as well as the *Busselton-Dunsborough Times* and *Augusta-Margaret River Times* newspapers\*
- a notice on the department's webpage. The plan could be downloaded and submissions made online
- the draft plan being sent to more than 430 stakeholders, including State and Federal government departments, local government authorities, traditional owners, non-government organisations, community groups, local businesses and individuals
- staff holding displays at shopping centres in Dunsborough, Margaret River and Augusta
- presentations to councillors and staff at the City of Busselton and Shire of Augusta-Margaret River, Capes Parks Community Advisory Committee, Cape to Cape Catchments Group, South West Aboriginal Land and Sea Council and South West Boojarah working party and the Harris Family native title claimant group
- copies of the plan being available for viewing at the department's libraries and offices in Perth, Bunbury and Busselton as well as at local government libraries in Busselton, Dunsborough, Margaret River, Augusta and Nannup
- posters advertising the release of the draft plan being displayed in local department offices, local government buildings, shopping centres and cafes.

\* requirement under the *Conservation and Land Management Act 1984* (CALM Act).

The Conservation Commission has changed its approach to management planning, resulting in a more concise final plan; it has been reduced by more than half. This means that some comments were no longer applicable once much of the explanatory text was removed. The public were advised of this change when invited to make submissions on the plan. The changed approach also resulted in the inclusion of objectives which link to key performance indicators.

Sections of the draft plan with similar management actions (such as the chapter entitled *Managing the natural environment*) have been grouped together in the final plan. Text that indicated management intent was rearranged to join the list of management actions, and modified to reflect the new combined sections. The final management plan also presents updated information, particularly when additional information was provided in submissions or where new research has been completed.

## METHODOLOGY

The draft plan was reviewed in the light of submissions received, according to the criteria outlined below.

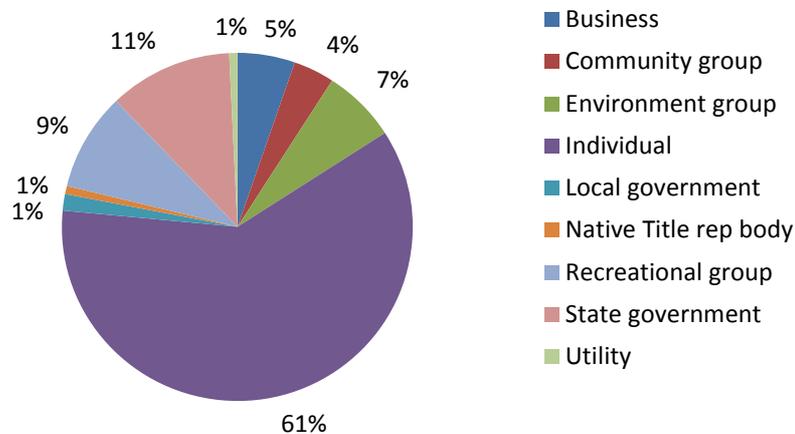
1. The draft management plan *was* amended if a submission:
  - a) provided additional information of direct relevance to management
  - b) provided additional information on affected user groups of direct relevance to management
  - c) indicated a change in (or clarified) government legislation, management commitment or management policy
  - d) proposed strategies that would better achieve management objectives
  - e) indicated omissions, inaccuracies or a lack of clarity.
2. The draft management plan *was not* amended if a submission:
  - a) clearly supported proposals in the plan
  - b) made general statements and sought no change
  - c) made statements already in the plan or that were considered during the plan preparation

- d) addressed issues beyond the scope of the plan
- e) was one amongst several widely divergent viewpoints received on the topic but the text/strategies in the plan were still considered the preferred option
- f) contributed options that were not feasible (generally due to conflict with existing legislation, government policy, lack of resource capacity or lack of research knowledge to make decisions)
- g) was based on unclear/factually incorrect information
- h) provided details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term.

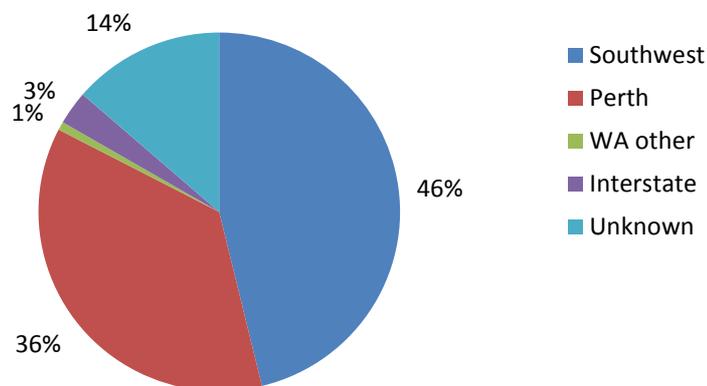
Comments made in submissions were assessed entirely on the cogency of points raised. No subjective weighting has been given to any submission for reasons of its origin or any other factor that would give cause to elevate the importance of any submission above another.

## ABOUT THE SUBMITTERS

One hundred and thirty-two submissions were received on the draft plan. Figures 1 and 2 show the breakdown of submitters according to category and location.



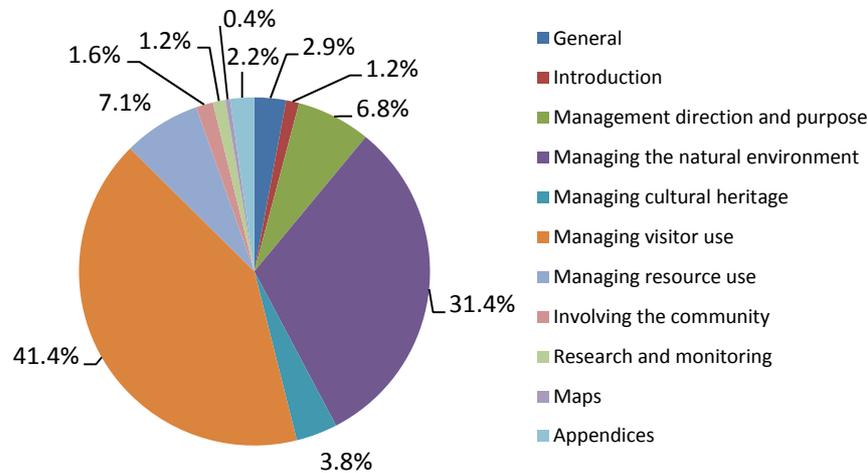
**Figure 1. Category of submitter**



**Figure 2. Location of submitters**

## KEY ISSUES AND THEMES

The 132 submissions received on the draft plan translated to 657 comments, addressing all aspects of the plan. Of the submissions, 49 were a proforma relating to mountain biking. Figure 3 shows the breakdown of comments according to chapter in the draft plan.



**Figure 3: Comments by chapter**

\*includes fire management

About 29 per cent of comments resulted in a change to the final plan, as many submissions were supportive or made neutral statements. The key issues and themes raised by submitters are outlined below, as well as how these comments were considered when amending the plan.

### Management arrangements with Aboriginal people

The final plan commits to meaningful and collaborative engagement with traditional owners in managing the planning area. It is consistent with the CALM Act and the south-west native title settlement negotiation process that is currently underway between the State Government and native title claimants in the Noongar single claim area. Submissions received on the draft plan were supportive of this commitment.

### Community involvement and liaison

There is intense public interest in management of the planning area and there are many organisations, groups and individuals who play an active role in assisting with management activities. Through the public consultation process, it was determined that the importance of community support was not adequately acknowledged in the draft plan and, accordingly, the final plan contains a stronger emphasis on working with the community to achieve the plan's management objectives.

Both during and after the public submission period, staff met with a number of stakeholders including traditional owners, local government authorities, recreational user groups and non-government organisations to address concerns and gain support for the management objectives and strategies in the plan.

### Tenure

Most submissions regarding tenure were supportive or requested changes to the draft plan with which the department agreed. In response to submissions, the following changes were made to the plan:

- proposed tenure additions have been prioritised according to biodiversity conservation and/or management benefits (such as boundary rationalisation). This will assist in identifying and progressing high priority tenure additions
- based on submissions and a subsequent review of Crown reserves and unallocated Crown land adjacent to the planning area, the final plan contains proposed additions that did not appear in the draft plan, particularly around east Augusta. The Shire of Augusta-Margaret River and City of Busselton have been consulted on the new tenure additions that are proposed in the final plan

- as a result of submissions and subsequent consultation with the relevant local government authority, the final plan includes recommendations to excise parts of Leeuwin-Naturaliste National Park and transfer management to local government where appropriate (such as to enable access to the Gracetown boat ramp).

### **Physical environment**

Many comments in this section were more relevant on a catchment scale. That is, integrated (multi-agency or landholder) management is required to satisfy these comments.

A few submitters identified the importance of determining the extent of the catchments supplying the karst system – this was already noted in the draft plan.

One submitter noted the omission of the Augusta shell bed (in a proposed addition) as a geoheritage site and provided a suggested alternative for the paragraph on this issue. This was condensed and incorporated into the plan.

### **Native animals**

Most of the comments related to clarification or updating information on the aquatic root mat communities. The plan was amended where required.

One submitter wanted clarity on the need for further research on cave fauna. Research requirements were moved to the *Research and monitoring* section and the relevant research requirement was amended to include invertebrates in cave systems.

### **Introduced species**

While the department's efforts in weed control were acknowledged, a number of submitters were concerned that it is not being appropriately resourced (including funding) and is not complementary to the work being undertaken on private property (that is, there needs to be more weed control along the park boundary).

Some submitters commented on their support for baiting and/or increased baiting regimes.

Marri and peppermint decline were noted as management concerns absent from the plan, as was the high potential for myrtle rust to invade the planning area over the life of the plan. These issues are addressed in the final plan.

### **Cultural heritage**

Submissions indicated that a greater emphasis should be placed on recognising Aboriginal cultural heritage in the planning area. More information is included in the plan, particularly in relation to Ellensbrook. The plan has also been altered to reflect the amendments made to the CALM Act.

### **Fire management**

Submissions received on fire management argued equally for and against preventative fire management practices, particularly the use of prescribed fire. Overall, the general management intent that appeared in the draft plan remains the same; however, some changes in the final plan include:

- a chapter dedicated to fire management, whereas in the draft plan it was part of the chapter *Managing the natural environment*
- there is a greater emphasis on working cooperatively with the Department of Fire and Emergency Services, local government, volunteer bushfire brigades and traditional owners in managing fire in and adjacent to the planning area
- some minor changes to the boundaries of fire management zones to better reflect the protection needed near growing residential areas adjacent to the planning area
- a statement about considering a second access road to coastal settlements
- reiteration of the responsibility of adjacent land managers and private landholders in implementing preventative fire management practices on land adjacent to the planning area.

In November 2011, while the final plan was in preparation, a significant bushfire occurred along the Leeuwin-Naturaliste coast. This gave rise to a formal review and post incident analysis that resulted in changes to how bushfires, both prescribed and unplanned, are managed in Western Australia. The fire section of the plan has been comprehensively reviewed in consultation with Department of Fire and Emergency Services, local government and volunteer bushfire brigades, and is consistent with fire planning being undertaken by Department of Fire and Emergency Services and local government. The plan is also consistent with the recommendations of *Appreciating the Risk: Report of the Special Inquiry into the November 2011 Margaret River Bushfire* (Keelty 2012).

## **Managing visitor use**

Balancing sustainable visitor use with the management objectives of protecting the area's natural, cultural and heritage values is the biggest challenge for this management plan. Most submissions received on the draft plan called for greater access to undertake recreational activities, particularly mountain biking, horseriding, paragliding and hang-gliding. After careful consideration of the submissions and further consultation with recreational user groups, the final plan is more flexible in allowing for recreational activities, provided impacts on key values can be minimised and other park users are not detrimentally affected.

Changes that appear in the final plan include:

- completing a recreation master plan for the national parks of the planning area
- undertaking a recreational impact study in the Boranup area of Leeuwin-Naturaliste National Park to determine if it can sustain the number and intensity of recreational activities that occur
- working with the Department of Sport and Recreation, local government and mountain biking groups to provide for mountain biking in the planning area, with an emphasis on Bramley National Park
- designating horseriding trails in four areas in Leeuwin-Naturaliste and Bramley national parks
- allowing for paragliding and hang-gliding at the three sites where it already occurs in Leeuwin-Naturaliste National Park
- working with local government and the community to resolve the issue of access at Kilcarnup and Joey's Nose.

## **References**

Department of Environment and Conservation 2010, *Leeuwin-Naturaliste Capes Area Parks and Reserves Draft Management Plan*, Department of Environment and Conservation, Perth.

Mick Keelty 2012, *Appreciating the Risk: Report of the Special Inquiry into the November 2011 Margaret River Bushfire*. Prepared for the Government of Western Australia. Accessed 16 August 2013 at <http://www.dpc.wa.gov.au/Publications/Documents/Margaret%20River%20Bushfire%20Inquiry.pdf>