

SWAN COASTAL PLAIN SOUTH

Analysis of Public Submissions

to the

Draft Management Plan 2014

Department of Parks and Wildlife

for the

Conservation Commission of Western Australia

1. OVERVIEW

This document is an analysis of public submissions to the *Swan Coastal Plain South draft management plan 2014* (draft plan) (DPaW 2014). It presents key issues and themes that arose from submissions received on the draft plan 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 (Conservation Commission) from 28 February 2014 to 30 May 2014. A notice of the plan's release was published in the *Government Gazette* on 28 February 2014.

There is strong community interest in the management of the parks and reserves of the southern Swan Coastal Plain. As such, a communication strategy was developed and implemented to promote the release of the draft plan for public comment. The strategy included:

- advertisements in two editions of both *The West Australian* and the *Bunbury South Western Times* newspapers
- a notice on the department's webpage. The plan was able to be downloaded and submissions made online
- the draft plan was sent to over 300 stakeholders, including State and Federal government departments, local government authorities, traditional owners, non-government organisations, community groups, local businesses and individuals
- copies of the plan were made available for viewing at the department's science library at Kensington, and offices in Perth (Kensington, Crawley and Wanneroo), Mandurah, Bunbury and Busselton.

2. METHODOLOGY

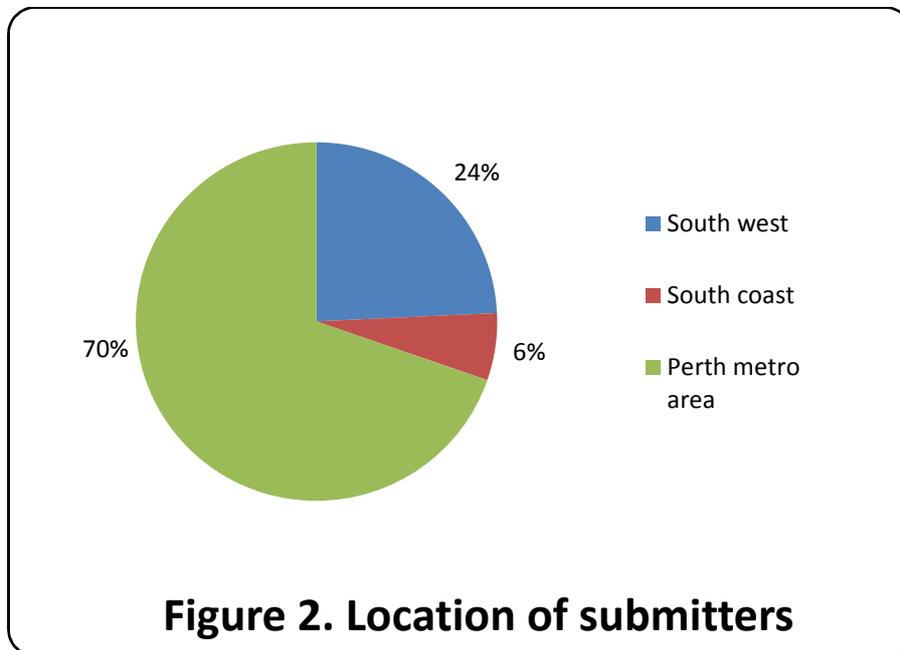
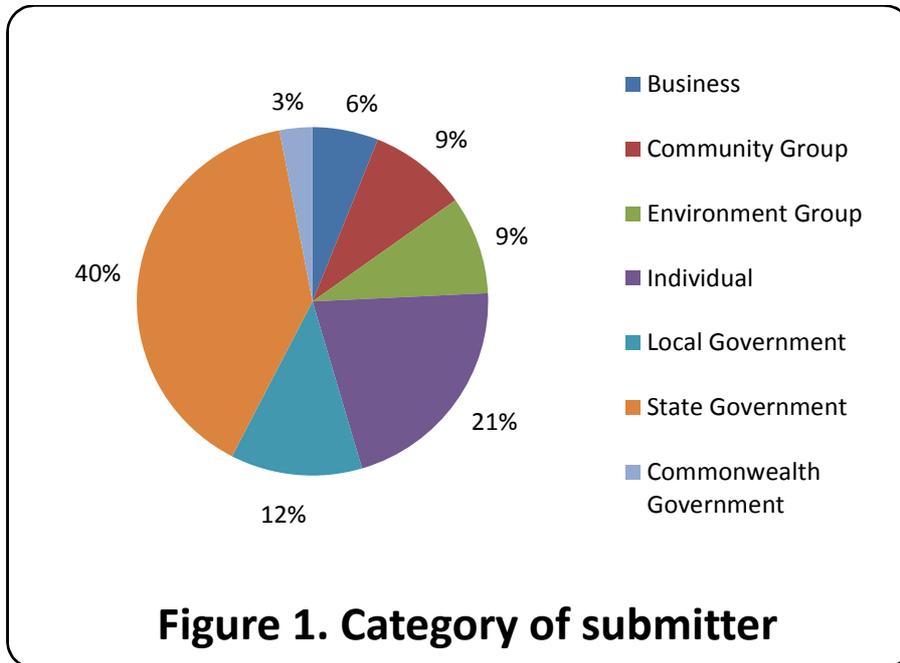
The draft plan was reviewed in the light of submissions received, according to the criteria outlined below.

1. The draft management plan *was* amended if a submission:
 - a) provided additional information of direct relevance to management
 - b) indicated a change in (or clarifies) government legislation, management commitment or management policy
 - c) proposed strategies that would better achieve management objectives
 - d) 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 no change was sought
 - c) made statements already in the plan or 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 or strategies in the plan are still considered the preferred option
 - f) contributed options that are not feasible (generally because of conflict with existing legislation, government policy, lack of resource capacity or lack of research knowledge to make decisions)
 - g) was either unclear or based on 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.

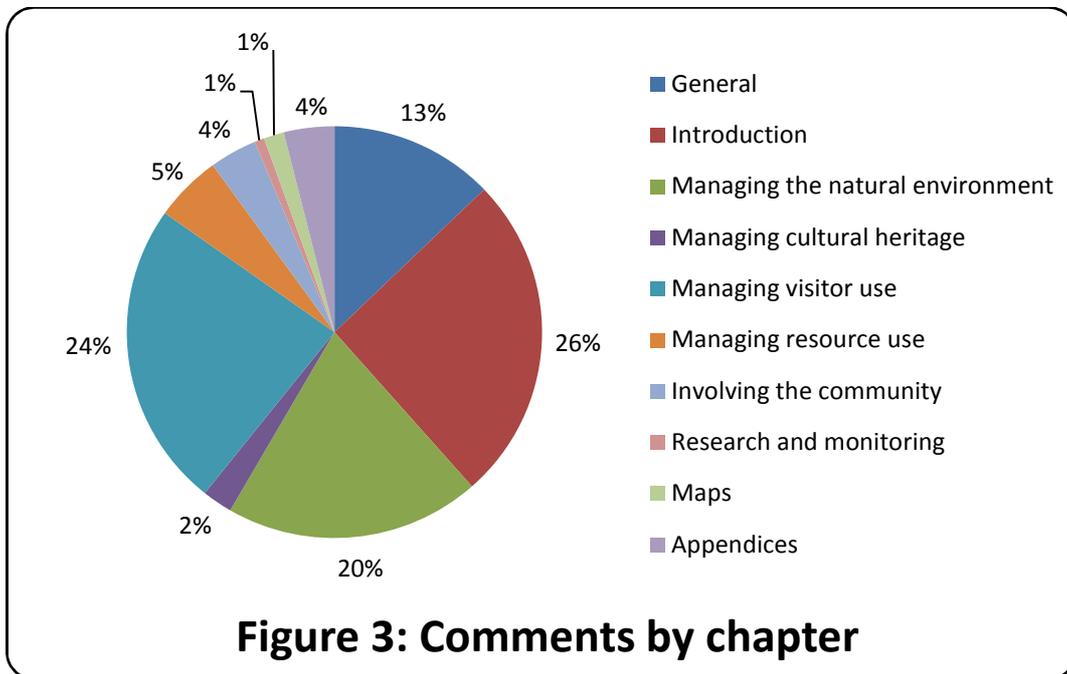
3. ABOUT THE SUBMITTERS

A total of 33 submissions were received on the draft plan. Figures 1 and 2 show the breakdown of submitters according to category and location.

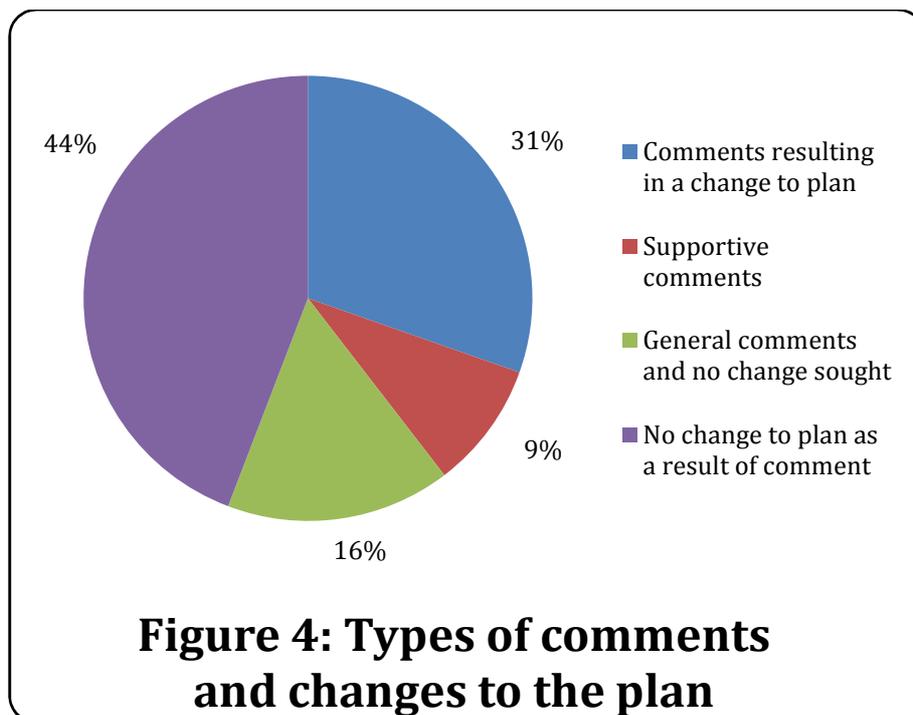


4. KEY ISSUES AND THEMES

The 33 submissions received on the draft plan translated to 382 comments, addressing all aspects of the plan. Figure 3 shows the breakdown of comments according to chapter in the draft plan.



Just over 30% of comments resulted in a change to the final plan (Figure 4). Over 9% of comments were supportive of the plan and a further 16% of comments were general and did not seek a change to the plan. The key issues and themes raised by submitters are outlined below, as well as how these comments were considered when amending the plan.



General comments

Several submitters raised concerns about the generality of the draft management plan, suggesting it was quite broad, did not contain enough detail to provide management direction and covered too large an area. The opening paragraph of the plan clearly outlines that more-detailed planning and the development of operational management plans may be required before further works and management is carried out in specific reserves and this is reiterated throughout the plan. In addition, in its document, *Recommendations: Reforming management planning for national parks, conservation parks and nature reserves in Western Australia – 2010 and onwards* (Moore and Roger 2009), the Conservation Commission recommended that management plans are more strategic, concise and do not outline detailed actions (which are better placed in operational plans). This report also recommended that planning occurs for groups of, rather than individual reserves. It was with these recommendations in mind that the draft plan was developed.

There were also some comments about the lack of detail about how management actions are to be funded and resourced. Likewise, costing of the management actions is determined by the Department of Parks and Wildlife (the department) at an operational level by the relevant Region or District.

Management plan area

There was concern from several submitters about the inclusion of Canning River Regional Park (CRRP) in the planning area and that the final plan will replace the *Canning River Regional Park Management Plan 1997-2007* (CALM 1997). The department acknowledges that Table 1 in the draft management plan was confusing as it did not adequately explain why some management plans were replaced and others not. As a result Table 1 was removed and the text updated to outline which management plans were to be replaced.

Key values and threats

Several submitters referred to a number of additional threats to the planning area not covered in the draft plan including:

- illegal rubbish dumping
- the increase in demand for access to reserves for recreation, education, commercial and resource uses
- unauthorised and inappropriate recreational activities, especially the unlawful use of off-road vehicles in reserves.

The threats are now referred to as “Key management issues”. The draft plan refers to illegal rubbish dumping as a key management issue and on page 41 under *Visitor Behaviour*. The management plan was updated to include a management action about ways of deterring unauthorised access and illegal activities. Impacts from increasing visitor numbers, and unauthorised and inappropriate recreational activities were added to the list of key management issues.

Management arrangements with Noongar people

Since the release of the draft management plan, Indigenous Land Use Agreements (ILUAs) for the resolution of native title across the South West of Western Australia (the SWNT Settlement) were executed. The SWNT Settlement resolves native title in the settlement area by agreeing that native title does not exist, in exchange for a package of benefits contained within the ILUAs, including joint management over parts of the conservation estate. As part of the SWNT Settlement, the native title claim groups will be replaced by Regional Corporations and the South West Aboriginal Land and Sea Council will be replaced by a Central Services Corporation. The department will establish Cooperative Management Committees with the Regional Corporations, which will provide advice on the management of conservation estate within each Regional Corporation area.

Should the department and the relevant Regional Corporation agree to enter into a joint management agreement for reserves within this management plan area, then the joint management agreement related to those reserves will be attached to the management plan. Information about the execution of the ILUAs associated with the SWNT settlement, the roles of the Regional Corporations and Cooperative Management Committees, the potential for joint management over the area and the implications of these changes for the planning area were added to the management plan.

Tenure

Several submitters referred to some omissions in the CRRP map (Figure 4) and some inaccuracies associated with the regional park boundary. Submitters felt that there were many issues dealt with in detail in the CRRP management plan that were not adequately discussed in the draft plan. Submitters also suggested that Figure 4 (Map showing the CRRP management areas) and Appendix 2 (Table listing the CRRP management areas) were confusing and did not adequately address the management of the CRRP.

The department acknowledges that CRRP covers a range of tenures, managed with other agencies and community groups, and that specific management will require further consultation at an operational level. In the preparation of the final plan, the CRRP Community Advisory Committee, the department's Regional Parks Unit and the City of Canning were extensively consulted to ensure the plan captured all necessary information. As a result Figure 4 was updated and included with Appendix 2 (Table listing the management areas) and additional text was added to describe CRRP, its tenure and management.

There is a proposed Peel Regional Park, which will protect and manage areas around the Peel Inlet and Harvey Estuary. Also there is a proposed Leschenault Regional Park, which comprises about 2,146 hectares of land in the Greater Bunbury area. Information on these two proposed regional parks and the potential addition to Canning River Regional Park were added to the plan.

Managing the natural environment

Most comments in relation to this chapter indicated omissions, inaccuracies or lack of clarity and these corrections were made.

A number of comments suggested that the relationship between CRRP and the Swan Canning Riverpark was not clearly explained in the draft plan. Since the release of the draft plan, the Swan River Trust's former staff have become part of the department. Further detail about the Swan Canning Riverpark and its management was added to the plan.

One submitter suggested that the department adopt best-practice mosquito control measures for reserves in developed areas of the Swan Coastal Plain. The plan now states that mosquito management within conservation reserves may be necessary to address public health concerns in relation to mosquito borne diseases.

Managing cultural heritage

Comments in relation to this chapter generally indicated omissions, inaccuracies or lack of clarity and these corrections were made.

Since the release of the draft management plan, ILUAs associated with the SWNT Settlement have been executed. The Settlement outlines that the native title claim groups will be replaced by Regional Corporations. Cooperative Management Committees and Joint Management Bodies will provide advice on the management of conservation reserves and heritage values within each Regional Corporations. This information was added to the management plan and the management actions were modified accordingly.

Managing visitor use

Some comments in relation to this chapter indicated omissions, inaccuracies or lack of clarity and these corrections were made.

There was strong support for horseriding within the planning area and many comments proposed a range of ideas associated with horseriding trails. As a result, information about *Taking the Reins: The Western Australian Recreational Horse Trail Strategy* (PX2 Pty Ltd 2015), to which the department has provided input, was added to the final plan. An explanation of the department's in principal support of the Strategy's recommendations and commitment to working with other horseriding stakeholders to implement this plan was also added.

Since the release of the management plan, the Department of Transport gazetted the closure of all waters of the Canning River upstream of the Kent Street weir to all motorised vessels, with the exception of Swan River Trust and Department of Water vessels and proposes the introduction of closed waters for motorised vessels upstream of Riverton Bridge and the retention of existing closed waters for motorised vessels at Matilda Bay. This information was added to the management plan.

Managing resource use

Comments relating to this chapter indicated omissions, inaccuracies or lack of clarity and these corrections were made.

Maps and Appendices

Several submitters raised concerns about the maps lacking clarity and errors in the tenure tables shown in Appendices 1-3. The maps and appendices were amended to clearly show the existing and proposed tenure in the planning area, and to include any recent changes to the existing and proposed tenures.

References

CALM (1997) *Canning River Regional Park Management Plan 1997 – 2007. Management Plan No 36.* Department of Conservation and Land Management, City of Canning and National Parks and Nature Conservation Authority, Perth, Western Australia.

Department of Parks and Wildlife (2014) *Swan Coastal Plain South Draft Management Plan*, Department of Parks and Wildlife, Perth, Western Australia.

Moore, S.A. and Rodger, K. (2009) *Recommendations: Reforming management planning for national parks, conservation parks and nature reserves in Western Australia – 2010 and onwards.* Report prepared for the Conservation Commission of Western Australia, Crawley, Western Australia.

PX2 Pty Ltd (2015) *Taking the Reins – The Western Australian Recreational Horse Trail Strategy.* Prepared for the Australian Trail Horse Riders Association, Western Australia.