

**Summary of issues from public submissions to the
*Albany coast draft management plan 2016***



New visitor facilities at The Gap looking towards Eclipse Island. Photo – Department of Parks and Wildlife

January 2017

**Planning Branch
Department of Parks and Wildlife**

1. INTRODUCTION

On 6 May 2016, the *Albany Coast Draft Management Plan 2016* was released by the Minister for Environment for a two-month public submission period, which closed on 8 July 2016. A total of 27 submissions were received.

This document summarises the key issues raised in the public submissions and will aid the Conservation and Parks Commission in considering their approval of the plan under s59A(1) of the *Conservation and Land Management Act 1984* (CALM Act).

2. PLAN DISTRIBUTION

Coinciding with the release of the draft management plan, a public notice about the proposal was published in the *Government Gazette* and *The West Australian* and *Albany Weekend Extra* newspapers, as required under s57(2) of the CALM Act. The plan was distributed to relevant Ministers, State Government departments and local government authorities as per s59(2), (6), (7) and (8) of the CALM Act. Notifications of the release of the plan were also distributed to tertiary institutions, libraries, peak bodies, stakeholder groups and numerous individuals who expressed an interest during the planning process. Copies of the plan were made available at the Albany and Kensington offices of the Department of Parks and Wildlife (Parks and Wildlife or department). Social media was used by Parks and Wildlife to further notify the public about the proposal and submission period. Digital copies of the plan and a Survey Monkey online submission form were made available on the Parks and Wildlife website, where interested parties were encouraged to lodge submissions.

3. SUBMISSION PROCESSING AND ANALYSIS METHODOLOGY

A total of 27 submissions were received consisting of 18 written submissions (received via email or post) and nine online Survey Monkey forms.

Information was recorded relating to the submitter's contact details and location, submitter type/interests (for example, tourism industry, Albany local) and key issues identified. Once the data entry was complete, statistics were generated on several aspects of the public submissions including an overview of submitter demographics, an explanation of the key issues raised in submissions, and a summary of key issues by chapter/sector (for example, conservation, recreation and tourism), and this reports describes these results.

4. WHO PROVIDED FEEDBACK

Of the 27 submissions received, most were from government organisations (see Appendix 1). The location of submitters was evenly distributed between the Perth metropolitan area and the Albany/south coast area.

The 27 submissions received translated to more than 200 comments, addressing most aspects of the plan. More than half of the comments were about natural and recreation values, and the rest of the comments were spread among the remaining components of the plan.

Thirty-eight per cent of the comments resulted in a change to the plan. While most of the comments resulted in no change to the plan, this was because they either supported the plan or made general comments about the plan.

5. KEY ISSUES

5.1 Rock climbing and abseiling

Within one of the most commented-on chapters of the plan, 42 per cent (22) of comments were about rock climbing and abseiling. This section of the plan was significantly changed to take into account submissions. Specifically:

- two separate sub-sections were created for rock climbing and abseiling;
- consistent with *Corporate Policy Statement No. 18: Recreation, Tourism and Visitor Services*, the plan was changed to correct the misinterpretation caused by the mentioning of designated areas, and to state that rock climbing is allowed throughout the planning area (including The Gap and Natural Bridge), subject to the maintenance of conservation values, safety standards, the rights and enjoyment of other visitors, or where specific restrictions may be required. The plan outlines some rock climbing restrictions for The Gap and Natural Bridge as well as the use of bolting on rock faces;
- the Climbers Association of Western Australia has been specifically mentioned in both the text and management actions in terms of general liaison regarding rock climbing as well as in terms of their codes of ethics, which is cited in Policy 18;
- the approach to recreational abseiling was reviewed and changed in the plan. Given that there are no sites that are primarily used for 'recreational abseiling' in the planning area, (i) management action 3c and the key performance indicator (KPI) were changed to remove abseiling, (ii) a new action was added to specifically allow abseiling throughout the planning area subject to obtaining 'lawful authority' from the Regional/District Manager (consistent with the Conservation and Land Management Regulations 2002 [CALM Regulations]), and (iii) the plan provides for further investigation and consideration of areas that might be designated for this activity.

5.2 Hang gliding

Issues raised by submissions associated with hang gliding included that:

- there should be more detail on, and commitment to, hang gliding in the plan;
- there were no sites yet 'designated' for hang gliding in Gull Rock National Park;
- several other sites such as Bamboos in Waychinicup National Park, Ledge Beach in Gull Rock National Park and Isthmus Hill in Torndirrup National Park could be mentioned in the plan;
- there were no KPIs for hang gliding.

The plan was changed to better outline that hang gliders and paragliders are classed as aircraft under the Civil Aviation Regulations 1988, and that the CALM Regulations (Regulation 65) require lawful authority for aircraft to launch, land or make a touch down on department-managed land. However, Regulation 6 of the CALM Regulations does not have any provision for designating areas for this activity as it does for dogs, horses and abseiling, and therefore no areas are designated and hang gliding is not included in the KPI. In recognition that the Shelley Beach area is frequently used for these activities, the plan was changed to propose the use of other mechanisms in the CALM Regulations to grant general lawful authority for hang gliding and paragliding in this area.

Although several sites in Gull Rock National Park were mentioned in the draft plan, the plan was changed to:

- include other specific sites (such as Bamboos in Waychinicup National Park and Isthmus Hill in Torndirrup National Park);
- make it clear in the text and by way of a new management action that hang gliding would be allowed at these sites, subject to lawful authority as required under the CALM Regulations;
- maintain these other sites in an unmodified condition.

The plan was also changed to allow for further consideration and investigation into how lawful authority will be granted in the future.

While some site naming and mapping issues were resolved on the Gull Rock map, Ledge Beach was not included in the list of sites because of potential to impact natural vegetation and other beach users.

5.3 Proposed reserves

There were a number of questions raised about proposed reserves that are currently water, mining, local government, unallocated Crown land and other types of reserves. Concerns were also expressed about the need for the plan to recognise the importance of adjoining Crown lands and their managers, as well as consultation with key stakeholders.

Many of the reserve proposals are from longstanding recommendations that date as far back as the 1992 *South Coast Regional Management Plan*. There are also some updated and new proposals. The plan recognises the value of proposed reserves for addition to the conservation reserve system and proposes further consideration and consultation with relevant agencies and stakeholders.

The plan has been changed to recognise the particularly important role that local government, especially the City of Albany, and other particular stakeholders play in land use planning in the area, and facilitate further consultation on the continuing process of land use planning and acquisition. The plan recognises the importance of continuing consultation with key stakeholders on this issue.

5.4 Performance assessment

One submitter was concerned that some of the actions in the *Two Peoples Bay Nature Reserve Management Plan 1995–2005* and the *West Cape Howe National Park Management Plan 1995–2005* have not yet been implemented. This submission also questioned how these actions were re-considered during the planning process and the adequacy of the 2010 *Albany Parks Performance Assessment*.

The performance assessment information can be drawn from several sources and is necessarily strategic in nature as required by the sub-regional planning approach for the Albany coast plan. This necessitated the wider examination of values and threats across the entire planning area, rather than just for Two Peoples Bay Nature Reserve and West Cape Howe National Park. These documents informed the drafting of the management plan, particularly some actions that have been carried over from the two previous management plans.

5.5 Noongar joint management and cultural heritage KPIs

There were some issues raised with the KPIs in the Noongar cultural heritage section. It was suggested that the target of “Establishment of at least one joint management arrangement with Noongar people under the CALM Act” be changed to “Establish a ten year strategy for joint management of all parks and reserves with Noongar people under the CALM Act”.

The proposed amendment may preempt decisions that may be made in future by the cooperative management body established through the South West Native Title Settlement (SWNTS). Accordingly, the KPI has been amended to: “Relevant commitments to joint and cooperative management through the SWNTS within the planning area are met.” The SWNTS provides for a cooperative management body to be established for each Regional Corporation area, and for two joint management agreements to be reached within each area within ten years. The revised KPI will enable better tracking of the performance measure (“involvement of Noongar people in management”) by measuring the implementation of commitments to undertake cooperative management (for example, the conduct of cooperative management committee meetings) and implementation of any agreed joint management bodies under the SWNTS.

There was also a concern that there is a lack of KPIs for the management actions, and it was suggested that additional KPIs and targets be included. Further KPIs associated with joint

management may be developed over the life of this plan through the implementation of the Cooperative Management and Joint Management arrangements that will be established through the South West Native Title Settlement. The Cooperative Management and Joint Management process will provide the principal mechanism for engaging with the Noongar community on the progress of management actions.

5.6 Management plan name

There was concern that the name of the management plan is confusing, misleading and implies that the whole Albany Coast is managed by Parks and Wildlife and that the plan covers all coastal lands.

The plan title has been changed to state that it covers Albany coast parks and reserves.

5.7 Coastal conservation connectivity

A topic that was mentioned in several different contexts throughout the plan was the value of coastal conservation connectivity, particularly the South Coast Macro-Corridor.

This is one of the main ecological features of the South Coast region, and the plan was changed to describe this or cross-reference to other relevant sections in several areas of the plan including the Overview, Key values, Climate and Biogeography sections.

5.8 Presence and naming of native and introduced species

There was a general grouping of comments related to concerns or questions about the presence or absence of, as well as incorrect or different scientific names for particular species. Most of these concerns and suggestions resulted in changes to the plan.

Species records for parks and reserves within the planning area are taken mainly from Parks and Wildlife's *NatureMap* database, and are also supplemented by other advice from various internal and external sources. This uses scientific names for species that are described in the *Wildlife Conservation (Specially Protected Fauna) Notice 2015*. If there is published or other special scientific advice to the contrary for any particular species, there can be a delay between when this occurs and when it is published in the next annual Notice, and can then be widely used.

5.9 Fire management

There were some concerns expressed by submitters about:

- the ability to contain controlled burning, and the timing of controlled burning to avoid fauna/avifauna breeding – while significant planning, expertise and resources are devoted to each individual planned burn, it is not without risk due to factors that are outside the control of fire-fighters. Research has determined that forest ecosystems accumulate combustible material (fuel) over time in accordance with a positive exponential curve that tends to plateau dependent on forest type and site productivity variables. The plateau fuel load is sufficient to support extreme fire behaviour under typical summer conditions in all vegetation types in the Albany area. If fire was to be removed from the ecosystems of Albany coastal reserves, fuels would accumulate and an unacceptable risk of high intensity, ecologically damaging bushfires would occur. Planned burning in Spring provides an opportunity to create patchiness across the landscape due to moisture differentials, which is more favourable to wildlife. Burning in Autumn is another window of opportunity when fuels are dry, but weather is milder and more conducive to burning.
- post-fire weed management – weed management aims to minimise the impact of weeds on fire behaviour and fire regimes through hazard mitigation strategies and use opportunities to undertake post-fire weed control to facilitate regeneration of native species. Particular problem areas/species may be directly targeted in annual weed management programs. Fire

management and prescribed burning is a complex undertaking, and weeds are considered during the planning and post-fire assessment phases. The plan has been changed to highlight weeds as an issue that need to be considered during fire management.

- controlling visitors in all parks and reserves with high visitation areas on days of extreme and catastrophic fire dangers – the plan has not been changed as this is an operational implementation matter.
- fire management of karri – there was some concern that limiting fire in karri may not be appropriate and it was suggested that a management regime for fire be created for this area of karri forest. Appendix 3 of the plan outlines the fire management outcomes and prescribed fire regime for a number of vegetation types in the planning area, including karri. The prescribed fire regimes in Appendix 3 and the wording in the management action have been changed to limit 'high intensity bushfire'.
- the sharing of information with local government authorities, brigades, Department of Fire and Emergency Services and adjacent stakeholders – the plan already includes an action to work closely with key stakeholders, and specific operational arrangements concerning a variety of information is incorporated into operational plans by the relevant agencies.
- a cross-tenure approach to fire mitigation activities – this is already covered in the plan, and is addressed at an operational level when the plan is implemented.
- consultation with traditional owners regarding traditional burns – the plan has been changed to include “the carrying out of traditional burning” in assisting and facilitating the needs and aspirations of Noongar people to access and undertake customary activities, and also to include Noongar people in cooperative and compatible fire management arrangements. With the finalisation and implementation of the South West Native Title Settlement process this may be an issue that is addressed by Cooperative Management Committees.

5.10 Designated areas

There was support from one submitter for designated areas for dogs. Conversely, there was some concern expressed about including designated areas for horses due to the potential for vegetation damage, and the spread of weeds and plant disease.

In terms of visitor use, the plan identifies Gull Rock National Park as a focus for recreation activities, including areas for dogs and horses, which are mostly not allowed for in other parts of the planning area. The plan was not changed as a result of this comment as it is considered that there are adequate safeguards in place within the plan for monitoring the impacts of this activity and managing the activity where impacts become significant or unacceptable.

6. SUMMARY

In summary, there were relatively few submissions to the draft management plan, and while most submissions were from State Government agencies, there was also good representation from the local community.

Comments covered most parts of the plan, however a few specific areas such as recreation activities, received more comments. There was generally good support and many concerns or suggestions received were able to be addressed through changes to the plan.

Appendix 1. Submitters to the Albany coast draft management plan

Government

Aboriginal Lands Trust
City of Albany
Department of Aboriginal Affairs
Department of Mines and Petroleum
Department of Planning
Department of Regional Development
Department of Sport and Recreation (x2)
Department of State Development
Department of Transport
Department of Water
Great Southern Development Commission
Premier/Minister for Tourism
State Heritage Office
Tourism Western Australia
Water Corporation
Western Australian Museum

Non-government organisations/community groups

South Coast NRM
Albany Hang-gliding Club
Climbers Association of WA

Tourism operators

Adventure Training Consultants

Individuals/other

P Armstrong
J Herron
B Kneebone/G Williams
S Prior
M Smith
J Watson