



# Analysis of Public Submissions

## The Deep Creek National Park, Talisker Conservation Park and small parks of the Southern Fleurieu Peninsula Draft Management Plan 2024

The Deep Creek National Park, Talisker Conservation Park and small parks of the Southern Fleurieu Peninsula Draft Management Plan 2024 was released for public consultation from **23 September 2024 – 23 December 2024**.

During that time, the public had the option to provide feedback on the draft plan by providing a written submission or completing a survey on the YourSAy website.

19 submissions were received, including 1 written response and 18 surveys. Table 1 outlines the submissions received and Table 2 summarises the feedback received and how it was considered in the finalisation of the plan. Table 3 contains a copy of the YourSAy survey questions.

All submissions on the draft park management plan have been reviewed against the following criteria:

Feedback meeting criteria 1-3 below, result in alterations:

1. Feedback provided additional information of direct relevance to the draft plan;
2. Feedback suggested an alternative approach that was considered more appropriate than that proposed in the draft plan;
3. Feedback highlighted omissions, inaccuracies or a lack of clarity.

Feedback meeting criteria 4-9 below **do not** result in alterations:

4. Feedback clearly supported the draft plan;

5. Feedback was already addressed in the draft plan;
6. Feedback addressed issues beyond the scope of the draft plan, or recommended the inclusion of detailed or prescriptive information that is not appropriate for a strategic plan of this type;
7. Feedback proposed an alternative approach but the recommendation of the draft plan was still considered the most appropriate option;
8. Feedback was based on incorrect information;
9. Feedback offered an open statement, or no change was sought.



Table 1: Submissions received

Sub #	Name	Respondent
1	Nastasja	Park visitor/interested individual
2	Shane Rosenboom	Park visitor/interested individual/environmental volunteer
3	Sharleen Pereira	Park visitor/interested individual/environmental volunteer
4	Ellen Williams	Park visitor/interested individual/environmental volunteer
5	Jeff Thomas	Park visitor/Interested individual
6	Peter Vowles	Interested individual
7	AA	Park visitor
8	Ashleigh Coombs	Park visitor/Interested individual
9	Barry Jessen	Park visitor/Interested individual
10	Mitchell Ellul	Park visitor
11	Chris Halford	Park visitor/Interested individual
12	Bianca Jade	Park visitor, interested individual, Park neighbour
13	Jack Liubinskas	Park visitor
14	Susan Soong	Park visitor
15	Simon Curtis	Park visitor/interested individual/environmental volunteer
16	Barry Brown	Interested individual
17	Ellen Turner	Park visitor, Interested individual
18	Bruce Greenhalgh	Park visitor, Interested individual
19	Anonymous	



Table 2: Analysis of feedback

Comment Number	Comment	Submission Number	Plan Altered	Response	Criteria
<b>General</b>					
1	Suggested a stronger focus on protecting the environment and not adding more art installations to the park.	3	No	South Australia's national parks, conservation parks and recreation parks are managed to achieve the objectives of the <i>National Parks and Wildlife Act 1972</i> (NPW Act). These objectives ensure that parks are managed primarily for conservation, whilst also supporting public use, enjoyment and education about the parks purpose and significance, which may, if appropriate, include art installations as part of a communication strategy.	8
2	Suggested a reduction in camping fees at Deep Creek National Park so that South Australia is aligned in cost to other states and territories.	2	No	Fees are not defined in strategic park management plans. Camping fees in Deep Creek National Park vary depending on the specific site and range from \$25 to \$30 per night/site. Vehicle entry fees are also waived at the campsites. Funds raised through Deep Creek National Park's camping fees contribute to park conservation, management and improvements.	6, 7
3	Recommended further reinforcement of littering in the park and campfire use.	3	No	In South Australia, littering in reserves is taken seriously and can result in significant fines. The specific fines for littering can vary based on the circumstances, but generally, the penalties include on the spot fines of up to \$500 and court penalties if the crime is more serious.  Inappropriate fire use, including campfires, lit under fire bans or outside designated areas in the parks, will also incur a fine or prosecution for civil damages.	6



4	Suggested that cars have a paper trail indicating they have registered to be in the park and all hikers in the parks should report to the Rangers Headquarters.	3	No	<p>Most park bookings are done online however it's suggested to have a copy of your booking receipt handy, either printed or on your smartphone, for reference during your trip.</p> <p>Park staff have a record of bookings and vehicle registration numbers and undertake on site monitoring. Booking details are also stored in the database so staff know who is using the trails in case of an emergency.</p> <p>It is on the onus of hikers venturing into remote areas or undertaking challenging activities to inform a contact about their whereabouts and expected return. Outlining this in a strategic plan of management is out of scope.</p>	6
5	Would like the plan to recognise that habitat preservation, not just biodiversity, is very important.	4	No	Reference to biodiversity in the plan includes habitats as a key component. Biodiversity refers to the variety of life forms, including level of genetic diversity within species and the variety of ecosystems and habitats in which the species live.	8
6	Advocates for expanding Deep Creek National Park to promote further revegetation opportunities.	4	No	The plan outlines opportunities to expand the park, through the acquisition of neighbouring land parcels, if they arise, in addition to establishing agreements with landholders to support the restoration of target species by management of remnant habitats on their properties.	5
7	Expressed the view that all habitats are bioregional and parks should take a bioregional networking approach that considers more wildlife corridors.	8	No	Addressed as a strategy under theme 1 'Create, maintain and restore wildlife corridors or linkages and ensure that areas of particularly high quality, connectivity or importance are carefully managed and considered for inclusion in reserve tenure, where possible.'	5
8	Limit any future development, including toilet blocks and paved roads that detracts from the natural environment, but include more walking trails, bike trails and bush camping areas.	10,18	No	There are seventeen extensive trails within the parks in this plan of management showcasing a diversity of natural, heritage and cultural wonders. At this present time no new trails are envisaged within the parks however a focus on maintaining these to ensure all visitors have an immersive experience is a priority.	7



				Any future development that supports visitor facilities, such as picnic areas, toilets and shelters, within the parks outlined in this plan of management, are always designed and constructed so that it does not impact the values of the park.	
9	Questioned the ethics associated with aerial culling	11, 14	No	Animal welfare is very important to the department and any culling will follow strict safety measures and best-practice methods for the humane destruction of animals. The department complies with the National code of practice for the humane shooting of kangaroos and wallabies for non-commercial purposes.	9
<b>Themes of management</b>					
10	Provided general support for the direction of the plan's themes of management.	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18	No	Submission supported the plan with no changes sought.	4
<b>Objective 1</b> Protect and restore habitats that support the parks priority species and natural processes.					
11	Requested that rather than using helicopters to cull animals, implement a booking system that allows hunters to access the area for a controlled and sustainable harvest of deer and other pests.	10,11	No	Hunting is not permitted in National Parks except when a person holds a permit under the <i>National Parks and Wildlife Act 1972</i> .  The request of a booking system is out of scope for a strategic document of this type.	6
12	Provided alternative wording to objective one in the management plan 'Protect, strengthen and restore habitats that support the parks priority species and natural processes with stewardship	8	No	Noted but not supported.  The addition of the word strengthen is covered under the definition of restore. The role of stewardship in the park is covered under theme 4 of the plan of management.	7



	linkages to all surrounding heritage agreement areas.'				
<b>Objective 2</b> Provide exceptional and inclusive visitor experiences and facilities that connects all people to nature					
13	Expressed the view that this objective needs to be balanced with recognizing that the true value of Deep Creek National Park lies in its tranquillity and seclusion. Large crowds would diminish this valuable characteristic, which is essential to the park's appeal.	1,4,9	No	Noted, however it is important to acknowledge that the management plan does not propose altering the current use of parks in a way that would significantly boost visitor numbers, which could compromise the peace and solitude that this park offers.	7
14	Recommends that inclusive visitor experiences should be available for everyone and not only for people willing and able to pay a large sum of money. This type of attraction should be kept out of National Parks which are for all to enjoy.	2, 11, 15	No	Comment noted. However, there are currently no plans to raise park fees or introduce costly exclusive experiences. The management plan emphasises the goal of providing outstanding and inclusive visitor experiences and facilities that will connect everyone to nature.	7
15	Service providers operating in the parks should be accredited by the SA Government.	3	No	A licence is required to conduct tours for fee or reward within protected areas of South Australia, pursuant to the Regulations of the <i>National Parks and Wildlife Act 1972</i> . The Department for Environment and Water (DEW) issues these licences on behalf of the Minister for Climate, Environment and Water.	8



16	Expressed the view that more walk-in camping options that have a greater distance between sites be available.	6,7,10	No	Comment noted and directed to asset management in the department. No new campsites are envisaged in the near future within Deep Creek National Park.	6
17	Expressed the view that more 2WD tracks to different parts of the Heysen Trail i.e. Boat Haven Beach, be available for people who want access with their car and can't walk or wish to camp.	14	No	Comment noted and directed to asset management in the department. However, the positioning of trails in Deep Creek National Park involves a careful balance of ecological protection, visitor enjoyment, cultural sensitivity and practical considerations such as the terrain of the site. Assessments are conducted to understand the potential ecological impact of constructing trails or roads for cars. Trails/roads in national parks aim to minimise damage to sensitive habitats, protect wildlife and avoid disrupting ecosystems.	6
18	Ensure that 4WD access is maintained to popular sites within Deep Creek National Park.	5,10	No	Comment noted and is recognised in the plan of management.	9
19	Recommended building viewing platforms for visitors.	11	No	This level of detail isn't outlined in a strategic plan of management however the comment is noted and directed to asset management in the department.	6
20	Allowing for responsible dog owners to bring their dogs to the parks or designated parks.	12	No	In South Australian national parks, dogs are often prohibited or restricted for several reasons including for wildlife protection, ecosystem integrity and cultural and heritage reasons. The parks in this plan of management are of high biodiversity value. They comprise the largest remaining portion of remnant natural vegetation on the southern edge of the Mount Lofty Ranges preserving important habitat for many fauna and flora species under the <i>National Parks and Wildlife Act 1972</i> and <i>Environment Protection and Biodiversity Conservation Act 1999</i> . For these reasons, dogs are prohibited, unless they are a certified assistance dog.	7



21	Recommended that visitors should have the choice to make their own way through the parks without always using designated trails.	12	No	Trails in South Australian national parks provide designated pathways for visitors to explore the natural beauty. They enhance accessibility to scenic areas, wildlife, and cultural sites, allowing people to engage with nature safely. By concentrating foot traffic along designated trails, the impact on surrounding ecosystems is also minimised. This helps to prevent soil erosion, protect sensitive habitats, and reduce damage to vegetation and wildlife. Well-maintained trails help ensure the safety of visitors by guiding them through potentially hazardous areas and away from dangerous terrain, such as steep cliffs or unstable ground. They also allow for easier navigation and reduce the risk of getting lost.	8
22	Recommended trail improvement in Talisker Conservation Park.	14	No	The trails in Talisker Conservation Park are within a Visitor Use Zone. The plan of management outlines that priorities for this zone will include improving park infrastructure such as trails. In the short term, only minor repairs and maintenance have been scheduled for trails in Talisker Conservation Park.	5
23	Advocates for mountain bike trails or the inclusion of rock climbing in the parks.	15	No	The vegetation associations and endemic plant species found in these parks are poorly represented in South Australia's protected area network and are of extremely high conservation significance. They are susceptible to threats associated with trail development and use, including the irreversible spread of phytophthora ( <i>Phytophthora cinnamomi</i> ). For this reason, mountain biking in the parks covered in this plan of management are not permitted. However, bikes are permitted on vehicle roads and public roads within the Parks.	7
<b>Objective 3:</b> Manage the risk of fire to protect life, property, natural and cultural values, and to maintain or improve biodiversity.					





24	Advocates for the establishment of a public firewood collection period, specifying start and end dates, to enable community members to gather fallen trees and dead branches for use as firewood in their homes.	10	No	The collection of firewood within South Australian national parks is prohibited.	7
25	Suggested the establishment and upkeep of more fire track routes for visitors in the event of a fire. Both the Trig and Tapanappa areas currently feature only one access road, which is in poor condition and bordered by dense vegetation.	15	No	The public tracks to Trig and Tapanappa are also one way fire access tracks. It would be unfeasible to turn this into a loop track based on the terrain. They are maintained by the region in line with regional fire management policies. Parks are usually closed when there is a catastrophic fire danger or even under Extreme Fire Danger.	8
26	Questioned that 'life' in the objective 'manage the risk of fire to protect life, property, natural and cultural values, and to maintain or improve biodiversity' should account for fauna and flora.	4	No	<p>The department has a Fire Management Policy, which states that the department will manage fire in the State's reserve system to protect life, property and environmental assets and enhance the conservation of natural and cultural heritage.</p> <p>Achieving balanced fire management outcomes for human life, property, environment and cultural assets can be complex. National and state policies place priority on the protection of human life (i.e. safety for firefighters and the community). National Parks and Wildlife Service fire management seeks to achieve environmental objectives consistent with the protection of human life but where these values conflict, human life is prioritised. However, as part of our overarching commitment to environmental outcomes, National Parks and Wildlife Service is dedicated to ensuring that fire management strategies strive to maximise positive environmental outcomes as far as possible.</p>	8



27	Many mobile black spots that should be addressed	15	No	Outside the scope of park management plans to address.	6
<b>Objective 4:</b> Work together with Ngarrindjeri People and stakeholders to celebrate and protect the cultural, environmental and heritage values of the parks.					
28	Recommended the development of an app specifically for users to report issues, document native wildlife, note habitat changes and share experiences. Recreational hunters would be able to contribute to this citizen science initiative.	11	No	Recommendation noted, however beyond the scope of inclusion in a strategic park management plan. This recommendation has been directed as a suggestion to regional management for the parks.	6
29	Questioned if non-Indigenous people will have reduced access to any part of the parks and encouraged access for all.	13	No	No exclusive use areas set aside for cultural activities have been identified in this park plan of management.	5
<b>Objective 5:</b> Ensure that the parks contribute to sustaining the health and wellbeing of Ngarrindjeri people and their Country.					
30	Suggested that this objective should account for everyone including the health and wellbeing for Ngarrindjeri People.	3,10,15	Yes	Acknowledge that access to quality green public space, in the form of a national, recreation and conservation parks, supports the physical and mental health of all members of our communities.  Objective has been changed to "Ensure that the parks promote community health and wellbeing"  This still supports the strategies that are outlined under theme 4 that accounts for promoting opportunities for all people, including Ngarrindjeri People, to connect with nature for health and wellbeing.	1
31	Questioned how this would be achieved when it is unlikely that there will be a consensus amongst Ngarrindjeri People.	5	No	The department has established relationships and procedures for working with First Nations People.  They are an important partner in the development of management plans.	9



32	Questioned what working with Ngarrindjeri people would look like.	18	No	There are numerous strategies in the management plan that outline how the department will work with Ngarrindjeri People to deliver this plan of management.	9
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**Table 3 – YourSAy Survey questions**

The questions included in the survey are outlined below. In most cases, respondents provided a mix of quantitative (checkbox) and qualitative (open text) data within the survey.

Question	Question type
Name	Open text
Suburb	Open text
Postcode	Open text
What is your relationship with these parks?	Checkbox
The draft plan identifies 4 high-level themes that describe priorities for the management of the parks. Do you support these themes, or have any comment on how they could be improved?	
-Protecting and enhancing natural values	Checkbox/open text
-Providing nature based tourism experiences	Checkbox/open text
-Managing fire	Checkbox/open text
-Celebrating and maintaining culture, heritage and community stewardship	Checkbox/open text
Each theme has one or two key objectives. Do you agree with these objectives, or do you have suggestions for improvement?	
-Protect and restore habitats that support the parks priority species and natural processes.	Checkbox/open text
- Provide exceptional and inclusive visitor experiences and facilities that connects all people to nature	Checkbox/open text
- Manage the risk of fire to protect life, property, natural and cultural values, and to maintain or improve biodiversity	Checkbox/open text



- Work together with First Nations and stakeholders to celebrate and protect the cultural, environmental and heritage values of the parks.	Checkbox/open text
- Ensure that the parks contribute to sustaining the health and wellbeing of Ngarrindjeri people and their Country.	Checkbox/open text
Each theme sets out key strategies for management of the parks in order to achieve the objectives.	
-Are there any strategies in this plan that could be improved?	Open text
-Are there any that should be removed or added?	Open text
Are there any other matters about the management of the parks in the Deep Creek National Park, Talisker Conservation Park and small parks of the Southern Fleurieu Peninsula more generally that you would like considered in finalisation of the plan?	Open text