



Analysis of Public Submissions

Dhilba Guuranda-Innes National Park and Yorke Peninsula Parks Draft Management Plan 2022

The Dhilba Guuranda-Innes National Park and Yorke Peninsula Parks Draft Management Plan was released for public consultation from 29 August until 30 November 2022.

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.

Thirty-two submissions were received, including two written responses and 30 surveys. Table 1 outlines the submissions received and Table 2 summarises the feedback received and how it was considered in 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	Shaun Dwyer	Park visitor
2	Christian (surname not supplied)	Park visitor, interested individual, local community member
3	Brenton Chivell	President of Innes Shack Owners Association
4	Ben Taylor	Park visitor, non-government organisation, educator
5	Jo Buchanan	Park visitor, interested individual, local community member, non-government organisation
6	Andrew Rushworth	Park visitor, interested individual
7	Barry Brown	Park visitor, non-government organisation
8	Rory (surname not supplied)	Park visitor
9	Denys Smith	Park visitor
10	Rob Gazzola	Park visitor
11	Rod De'Hoedt	Interested individual
12	Mark Hill	Park visitor
13	Julia Elsby-Rischmueller	Park visitor, local community member, environmental volunteer
14	Heather Webster	Park visitor, interested individual, local community member
15	Kate Denton	Park visitor, environmental volunteer
16	Sally Letcher	Park visitor, interested individual
17	Rosanna Centrella	Park visitor, interested individual, environmental volunteer
18	Kim Palfrey	Park visitor, interested individual
19	Susan Soong	Park visitor
20	Derek Brain	Park visitor, interested individual
21	Barry Brown	Park visitor, interested individual, non-government organisation
22	Christopher Coulson	Park visitor, interested individual
23	Sharon Reid	Park visitor, government
24	Peter Moriarty	Park visitor
25	Craig (surname not supplied)	Park visitor, interested individual
26	Brett Mensforth	Park visitor, interested individual
27	Jenny Oldland	Local community member, interest group
28	Colin Hughes	Park visitor
29	Geoff Fisher	Park visitor
30	Sarah Macdonald	Park visitor, interested individual
31	Geoff Fisher	South Australian Hang Gliding and Paragliding Association
32	Carmine Gallarello	Wander



Table 2: Analysis of feedback

Comment Number	Comment	Submission Number	Plan Altered	Response	Criteria
General					
1	Suggested an additional objective describing how sustainability will be achieved in the long-term.	2	No	No change. Submission did not provide sufficient detail describing what sustainability was in reference to.	9
2	Suggested more clarity regarding the long-term plan for the conservation parks (e.g. 5, 10, 50 year) including associated timelines.	2, 18	No	No change required. The plan outlines that conservation parks will be managed to protect their natural, cultural and heritage values. Management plans are high-level strategic documents and generally written for a 10 to 20 year timeframe.	5
3	Ensure local communities are engaged and involved with opportunities for economic activity.	2	No	Strategy 1 for Dhilba Guuranda-Innes National Park in Theme 3 supports working with partners including the local community to establish opportunities for economic benefit.	5
4	Would like an action plan with identification of lead stakeholders with timelines for implementation.	5	No	Park management plans are high-level strategic documents. Detailed action plans are developed and monitored more regularly at the operational level to ensure management is adaptive and flexible based on available resources.	6
5	Expressed the view that entry to Dhilba Guuranda-Innes National Park should be free.	6	No	This feedback has been noted but any change to park entry fees is outside the scope of the plan.	6
6	Supported the direction of the plan with a key focus on biodiversity conservation and supporting visitation.	7, 10, 11,	No	Submission supported the plan with no changes sought.	4
7	Suggested opening 4WD tracks so that visitors can explore and experience isolated areas within the parks.	8	No	Four wheel drive tracks won't be opened due to the sensitive nature of the environments within the parks and potential impacts to sensitive wildlife species and Narungga cultural sites.	7
8	Provided general support for the direction of the plan.	13, 20, 22, 23, 28	No	Submission supported the plan with no changes sought.	4
9	Expressed opposition to commercial opportunities in the parks and commercial tourism ventures that prevent public access to areas of the parks.	14, 29, 30	No	This position is noted. Proposals for commercial ventures that compliment or diversify nature-based experiences will be assessed on their merits and analysed with regard to potential impacts to park values and public visitation.	7



10	Suggested access for recreational fishing is maintained and improved.	21	No	Fishing is acknowledged as a popular recreational activity undertaken in the parks. There are many areas of the coastline within the parks that are accessible for fishing. Access to some areas may be restricted for safety, conservation or cultural purposes. Fishing within the Point Davenport marine park sanctuary zone will remain prohibited.	7
11	Expressed general opposition to the direction of the plan.	27	No	No specific feedback provided.	9
Management zones					
12	Suggested the addition of 2 more Visitor Use Zones in Dhillba Guuranda-Innes National Park along to allow for small scale development of eco-pod accommodation.	32	No	Three Visitor Use Zones have been identified in the plan where development of this nature is currently seen as appropriate and consistent with the protection of park values.	7
Theme 1: Honouring and advancing Narungga cultural and spiritual connection to Country					
13	Expressed opposition to the focus on Narungga culture and supporting traditional activities within Dhillba Guuranda-Innes National Park. Including Traditional Use and Cultural Protection Zones.	6, 11, 12, 18, 19, 25, 26	No	Co-management of the park plays an important role in involving Narungga people in the management of their traditional lands and advancing reconciliation. Desired outcomes of co-management include improved cultural site protection, maintenance of traditional practices and improved management through the combination of traditional knowledge and contemporary science.	7
Theme 2: Healthy land and sea					
14	Suggested that the success of flora and fauna conservation programs will be made more difficult by the long-term trend of broad acre farming and removal of paddock trees.	9	No	Comment noted. Conservation programs are strategic and take into account external impacts and are developed in consultation with neighbours and other stakeholders.	9
15	Suggested that predator control, particularly cats, will be needed to protect native animals.	14	No	The plan identifies that predator control will be undertaken to protect threatened species and support reintroduction of native fauna in Dhillba Guuranda-Innes National Park as part of the Marna Banggara project.	5
16	Suggested the inclusion of action plans and practical ways to link the state government, local	14	Yes	Additional text to promote programs such as citizen science has been included to highlight opportunities for public participation. Action plans are	1



	government and citizens to achieve the desired outcomes.			developed and monitored at a park operations level to ensure management approaches adapt to future challenges.	
17	Suggested that biodiversity conservation should be the main priority for the parks.	11, 16, 17	No	No change necessary. Biodiversity conservation is considered a high priority in the plan.	7
18	Suggested an objective to support the reintroduction of the dingo to assist in the maintenance of balanced ecology.	18	No	The reintroduction of the dingo to parks on Yorke Peninsula is not an activity that is being considered in the near future.	6
19	Questioning the need to control, particularly cull, western grey kangaroos in a reserve when they cause environmental damage.	19	No	Kangaroo numbers have increased substantially since European settlement to the point where they can cause adverse impacts on native vegetation and biodiversity. When this occurs, kangaroos may need to be managed to protect environmental values. Kangaroo species are protected, and their management is provided for by the <i>National Parks and Wildlife Act 1972</i> and associated regulations.	7
Theme 3: Embracing the spirit of Narungga Country					
Dhilba Guuranda-Innes National Park					
20	Suggested an additional objective for the provision of plentiful high quality visitor facilities such as campsites, shelters, tables, viewing platforms, toilets and waste facilities.	1, 11, 19	Yes	The objective remains unchanged as the intent includes provision of exceptional visitor experiences which includes high quality visitor facilities. However, strategy 6 has been amended to make it clearer that upgrades and development of facilities will be considered. Visitor Use Zones allow for development and upgrades of facilities to support tourist accommodation and nature-based tourism.	3
21	Continue to encourage recreation including surfing, fishing, walking, riding and general to ensure people support new initiatives in the park.	4	No	Strategies include supporting recreation in the park and working with Narungga, the tourism community and the local community regarding opportunities to develop and enhance visitor experiences. However, detail has been added to highlight some of the key recreation activities undertaken in the park.	5
22	Suggested the inclusion of quality sustainable access to key recreation sites.	4	Yes	Detail has been added in the strategies for the provision and maintenance of sustainable access to key recreation sites.	1



23	Suggested additional campsites including isolated bush camping and sites closer to swimming beaches.	8, 24	No	The plan allows for additional visitor facilities including campsites for the provision of quality experiences, to meet visitor needs and to accommodate higher demand. The specific location of new campsites is identified during operational planning.	5
24	Suggested that encouraging more visitors and increasing eco-sensitive tourism could provide long-term economic benefits.	11	No	The plan allows for nature-based tourism and commercial ventures and acknowledges the economic benefits of tourism.	5
25	Suggested unrestricted access to the parks for activities such as fishing and boating.	12	No	Access restrictions protect high conservation areas and Narungga cultural value as well as managing risks to public safety.	7
26	Suggested sealing the entire length of the Browns Beach Road, including the proposed road extension to Gym Beach.	19	No	Opportunities to seal the road will be addressed during investigations for the proposed road extension to Gym Beach.	6
27	Suggested a walking trail along the coastline.	19, 24	Yes	The development of Trails Strategy has been included in the plan to guide improvement and diversification of opportunities for walking and cycling in the park. This process will include investigating opportunities for new trails.	1
28	Suggested development of boardwalks and facilities around the interior lakes.	19	Yes	The development of Trails Strategy has been included in the plan to guide improvement and diversification of opportunities for walking and cycling in the park. This process will include investigating opportunities for boardwalks and access around interior lakes.	1
29	Suggested reinstatement of the ability to book campsites and pay park fees in person, within the park.	19, 25, 30	No	Noted. Online bookings is a state level policy. Changes to the payment arrangements for the park is beyond the scope of this management plan.	6
30	Suggested that hang gliding and paragliding are permitted activities.	29, 31	No	These activities are not supported in the park due to risks to visitor safety (unstable cliff areas), impacts to sensitive coastal areas and impacts of human disturbance from above to sensitive wildlife such as endangered coastal raptors.	7
31	Expressed the opinion that private shacks should be phased out of the park.	30	No	Shack leases are managed in accordance with lease conditions and the relevant government policies.	7
32	Suggested there should be more emphasis on the uniqueness and sustainability of the shacks at	3	No	The uniqueness, sustainability and promoting shacks in marketing strategies is too detailed for inclusion in the management plan. However, recognition of the shacks being used for holiday purposes by private citizens and	6



	Pondalowie Bay and utilising them in tourism marketing strategies.			seasonal accommodation by commercial fishers has been included in Theme 3.	
Theme 4: Understanding our shared histories					
33	Suggested more acknowledgement of early industry such as mining and fishing in the area now encompassed by Dhilba Guuranda-Innes National Park.	3	Yes	Detail regarding commercial fishing and shipping has been included in Theme 4. Information detailing the history of industry within the parks will be determined during the development of interpretive material.	3



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 lickert scale) and qualitative (open text) data within the survey. Where survey respondents did not provide additional text for questions 7 to 12, the respondent's feedback has been interpreted by the level of support indicated for the themes and objectives in questions 5 and 6.

Number	Question	Question type
1	Name	Open text
2	Suburb	Open text
3	Postcode	Open text
4	What is your relationship with these parks?	Checkbox
5	The draft plan identifies four themes that describe the priorities and recommended management objectives and strategies to protect and manage the parks. On a scale of 1 to 5 (1 being least important and 5 being most important), how important are these themes to you?	Lickert scale
6	The theme's set out objectives for management activities. On a scale of 1 to 5 (1 being strongly don't support and 5 being strongly support), rate your level of support for each objective.	Lickert scale
7	Do you have suggested changes to the objectives?	Open text
8	Are there any other objectives you think should be included?	Open text
9	The draft plan sets out strategies to achieve each of the objectives. Are there any strategies that you feel shouldn't be included? Why?	Open text
10	How could the strategies be improved?	Open text
11	Are there strategies that you would like to see included that aren't currently in the draft plan? Please provide details.	Open text
12	Do you have any other feedback on the draft plan which you would like considered in finalising the plan?	Open text