

# Analysis of Public Submissions

## Mount Remarkable National Park Management Plan Draft Amendment 2021

The Mount Remarkable National Park Management Plan Draft Amendment was released for public consultation on 30 June 2021. Consultation closed on 30 September 2021.

Members of the public had the option to have their say by completing an online survey or providing a written submission through the YourSAy website, email, or mail during that time.

Seventy-nine submissions were received, comprised of 55 survey responses and 24 written submissions. The submissions have been summarised in this document.

All submissions on the park management plan draft amendments are carefully 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 amendments;
2. Feedback suggested an alternative approach that was considered more appropriate than that proposed in the draft amendments;
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 amendments;

5. Feedback was already addressed in the plan;
6. Feedback addressed issues beyond the scope of the draft amendments, 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 amendment 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.

## Mount Remarkable National Park Management Plan Draft Amendment 2021 – public consultation summary

Twenty-four written submissions were received and are listed in Table 1. A summary of each of these written submissions, and the response to the feedback that has been taken is provided in Table 2.

Results from the survey are presented in Tables 3 and 4. The survey allowed for respondents to outline whether they supported the different amendments, and provide commentary on their response. Table 3 outlines each of the questions asked in the survey.

Table 4(a-f) outlines the proportion of respondents that supported each amendment, and the common themes from those who both supported and did not support the amendments.

A change was made to the four-wheel drive (4WD) amendments in response to public feedback to help address concerns. The amendments have been changed to create clear and explicit conditions managed under the licensing process. Should impacts still occur, park managers can restrict or permit 4WD tours as required. Changes have also been made to amendments relating to important species in response to feedback from Nature Conservation Society of SA.

**Table 1: Summary of written submissions**

Submission number	Name	Respondent
1	Alan Zoob	Individual
2	Wanda Rainsford	Individual
3	Matt Smith	Individual
4	Denise	Individual
5	Bruce Greenhalgh	Individual
6	Richard Bruce	Individual
7	Alan Carpenter	Individual
8	Anonymous	Individual
9	Anonymous	Individual
10	Anonymous	Individual
11	Patrik Seibert	Individual
12	Tanya Taverner	Individual
13	Phil Gee	Individual
14	Anita Allen	State Planning Commission
15	David Dunn	Individual
16	John Bojczuk	Individual
17	Kristen Norton	Individual
18	Donald Norton	Individual
19	Basher Jones	Individual
20	Anonymous	Individual
21	Donna Belder	Individual
22	Kookaburra Creek Retreat	Accommodation business
23	Bill Doyle	Individual
24	Nature Conservation Society of SA	NGO

**Table 2. Analysis of all written submissions**

Submission	Submission summary	Criteria	Response
1	Indicated general support for the amendments	4	No change necessary as the submission indicated support for the amendments
2	Concerns were raised about the potential impacts of increased bike trails in Mount Remarkable National Park.	7	No change, as the comment indicated a general lack of support for any additional bike trails within the park. It is believed bike trails can be developed in the park without negatively impacting other park values.
3	Concerns were raised about the potential impacts of increased 4WDs in Mount Remarkable National Park.	3	The amendment relating to four-wheel driving has been changed to add greater protections to park values
4	Concerns were raised about the potential impact of 4WDs and bike trails	7,3	The comment indicated a general lack of support for bike trails within the park. It is believed bike trails can be developed in the park without negatively impacting other park values. The amendment relating to 4WDs has been changed to help address concerns.
5	Concerns were raised about the potential impact of 4WDs, bike trails and tourism accommodation	7,3	The comment indicated a general lack of support for additional bike trails within the park. It is believed bike trails can be developed in the park without negatively impacting other park values. The amendment relating to 4WDs has been changed to help address concerns.
6	Indicated general support for the amendments	4	No change necessary, as the submission indicated support for the amendments
7	Concerns were raised about 4WDs. Support for bike trails. Raised additional concerns about other aspects of park management outside of the scope of these amendments.	4,3,6	The amendment relating to four-wheel driving has been changed to add greater protections to park values. No change required regarding bike trails, as the submission supported those amendments.
8	Concerns were raised about the potential impacts of increased bike trails in Mount Remarkable National Park.	7	No change, as the comment indicated a general lack of support for any additional bike trails within the park. It is believed bike trails can be developed in the park without negatively impacting other park values.
9	Expressed a general lack of support for the amendments and park management more generally.	6,3	The comment indicated a general lack of support for additional bike trails within the park. It is believed bike trails can be developed in the park without negatively impacting other park values. The amendment relating to 4WDs has been changed to help address concerns.

10	Expressed a general lack of support for the amendments.	7	No change, as the submission was generally unsupportive of the amendments rather than any specific aspect of the amendments.
11	Concerns were raised about the potential impact of 4WDs and bike trails	7,3	The comment indicated a general lack of support for bike trails within the park. It is believed bike trails can be developed in the park without negatively impacting other park values. The amendment relating to 4WDs has been changed to help address concerns.
12	Expressed a general lack of support for the amendments.	6	No change, as the submission was generally unsupportive of the amendments rather than any specific aspect of the amendments.
13	Concerns were raised about 4WDs. Support for bike trails. Raised additional concerns about other aspects of park management outside of the scope of these amendments.	4,3,6	The amendment relating to 4WDs has been changed to add greater protections to park values. No change required regarding bike trails, as the submission supported those amendments.
14	Provided commentary generally about the content of management plans and their relation to the state planning code.	9	No change necessary, as comments provided only additional open commentary on the application of the planning code in management plans.
15	Concerns were raised about the potential impact of 4WDs and bike trails	7,3	The comment indicated a general lack of support for bike trails near the Mambray Creek area. It is believed the current amendments help address these concerns by stating a preference for non-shared trails, and only allowing for bikes on trails following an assessment of risk. The amendment relating to 4WDs has been changed to help address concerns.
16	Concerns were raised about the potential impacts of increased bike trails in Mount Remarkable National Park.	7	The comment indicated a general lack of support for bike trails near the Mambray Creek area. It is believed the current amendments help address these concerns by stating a preference for non-shared trails, and only allowing for bikes on trails following an assessment of risk.
17	Supported the amendments, particularly the development of cycling trails. Local business owner attributing the benefits of tourism to the town of Melrose.	4	No change necessary, as the submission indicated support for the amendments

18	Supported cycling, 4WDs and accommodation amendments. Benefits of additional population and economic opportunities were raised.	4	No change necessary as the submission indicated support for the amendments.
19	Concerns raised about 4WDs due to the impact of noise, fumes, potential impact to environment and increased likelihood of accidents. Accommodation and kangaroo culling also not supported in park.	3,7	The 4WDs amendment has been altered to address concerns. The accommodation amendment has not been changed, as this submission puts forward a position that accommodation should be encouraged outside of the park – which the amendment does not preclude.
20	Did not support amendments relating to 4WDs or accommodation in park. Stated that any bike trails need to be developed carefully and sensitively, and consideration should be made to hikers.	3,7,6	The 4WDs amendment has been altered to address concerns. The accommodation amendment has not been changed, as it is considered tourism accommodation can be developed in certain areas of the park and create positive conservation outcomes. Bike amendments have not been altered because it is considered the current management plan and amendments contain provisions to ensure cycling tracks are well designed and managed, and any further detail would be beyond the scope of a strategic document such as a management plan.
21	Raised concerns about 4WDs in park, and support for amendments on culling for overabundant macropods. General comment was made on the lost opportunity to provide provisions for increasing resilience to climate change in the amendments.	3,4,9	The 4WDs amendment has been altered to address concerns. No change to amendments regarding overabundance of kangaroos.
22	Does not support accommodation in park. Accommodation should be on private land. Increased bushfire risk, traffic impacts. 4WDs not supported. Kangaroos not believed to be an issue, as opposed to feral animals and livestock. Cycling only supported if carefully planned	3,7,6	The 4WDs amendment has been altered to address concerns. The accommodation amendment has not been changed as it is considered tourism accommodation can be developed in certain areas of the park and create positive conservation outcomes. Bike amendments have not been altered because it is considered the current management plan and amendments contain provisions to ensure cycling tracks are well designed and managed, and any further detail would be beyond the scope of a strategic document such as a management
23	Raised concerns about accommodation in park, and noted that the amendments do not provide specific details on how these will be managed. Concerns about bike riders in non-designated areas should changes occur. Did not support 4WDs changes, and suggested existing text should remain. Increased walking infrastructure recommended.	3,6,7,9	The 4WDs amendment has been altered to address concerns. While this does not retain the text as is, it is believed the altered amendment addresses concerns, which mainly related to open access by individuals in 4WDs. Conflicts may be managed through a licensing process with established tour operators. Changes relating to cycling trails or hiking trails not required as it is anticipated impacts from cycling can be managed outside of the management plan process.

24	Raised concerns regarding EPBC listed communities, particularly in light of increased cycling trails in Willowie. Concerns also raised regarding 4WDs and concerns regarding tourism accommodation. Support for amendments relating to kangaroo control.	3,4,9	Changes have been made to incorporate feedback on EPBC listed populations. Detailed procedures to protect EPBC listed species are not considered relevant for a strategic document such as a management plan. These procedures existing outside of management plans. The changes to the amendments make it clear EPBC populations are a relevant concern. 4WDs amendments have been altered to address concerns. No changes to kangaroo control as submission clearly supported this amendment.
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**Table 3 – Survey questions**

Q1	Do you support the proposal to enable ecologically sustainable tourism accommodation in certain areas of Mount Remarkable National Park
Q2	Do you support the proposal to increase the Mambray Creek Visitor Use Zone in Mount Remarkable National Park to allow for the development of new camping experiences?
Q3	Do you support a proposal to create a new Visitor Use Zone over mainly previously disturbed land in the Willowie Forest section of the park on the eastern boundary?
Q4	Do you support the proposal to permit 4WD tours in the park, assessing permits on a case-by-case basis?
Q5	Do you support the proposal to develop mountain bike trails in areas other than Willowie Forest, the Warren Bonython Link Lands and Mambray Creek campground?
Q6	Do you support the proposed amendment to allow for the culling of western grey kangaroos when it is the only practicable method of control as part of a strategy to manage the total grazing pressure in Mount Remarkable National Park?
Q7	Do you have any other comments about the draft management plan amendments?

**Table 4a – Analysis of survey responses – Q1**

<b>Question</b>	Do you support the proposal to enable ecologically sustainable tourism accommodation in certain areas of Mount Remarkable National Park?
<b>Support %</b>	64.8%
<b>Not support %</b>	29.6%
<b>Unsure %</b>	5.6%
<b>Common themes in comments that did support amendments</b>	There is currently little choice or availability for accommodation. This may provide another attraction for the area, encouraging people to stay longer. Development should be carefully designed and sensitive to existing camping and environmental values.
<b>Common themes in comments that did not support amendments</b>	Development should occur outside the park. Any further development will detract from the current camping experience. Commercial operations should not be allowed in parks. This will impact on native flora and fauna.
<b>Common themes in unsure comments</b>	More interested in other amendments. Concerns about potential impacts from roads.
<b>Response</b>	General support was expressed for the proposed amendments. Comments not in support raised genuine concerns that will require strategic planning and ongoing management to ensure impacts are minimised. This is beyond the remit of a management plan.

**Table 4b – Analysis of survey responses – Q2**

<b>Question</b>	Do you support the proposal to increase the Mambray Creek Visitor Use Zone in Mount Remarkable National Park to allow for the development of new camping experiences?
<b>Support %</b>	72.7%
<b>Not support %</b>	12.7%
<b>Unsure %</b>	14.5%
<b>Common themes in comments that did support amendments</b>	More variety and options are required at Mambray Creek. This will encourage more people to use the park.
<b>Common themes in comments that did not support amendments</b>	Increased encroachment on nature will result. No more private development should be allowed within the area.
<b>Common themes in unsure comments</b>	The respondent does not use the camp grounds. Concerns government will not be able to expand campgrounds without loss of natural values. Concerns about increased levels of visitation causing follow-on effects.
<b>Response</b>	General support was expressed for the proposed amendments. Comments not in support raised genuine concerns that will require strategic planning and ongoing management to ensure impacts are minimised. This is beyond the remit of a management plan.

**Table 4c – Analysis of survey responses – Q3**

<b>Question</b>	Do you support a proposal to create a new Visitor Use Zone over mainly previously disturbed land in the Willowie Forest section of the park on the eastern boundary?
<b>Support %</b>	74.5%
<b>Not support %</b>	12.7%
<b>Unsure %</b>	12.7%
<b>Common themes in comments that did support amendments</b>	More access to natural areas is required across the region. Development must be sensitive to surrounding landscape, and visitor numbers should be managed.
<b>Common themes in comments that did not support amendments</b>	No extra disturbance should be allowed within a conservation area. Revegetation and rehabilitation of previously disturbed areas should occur instead of development of additional infrastructure.
<b>Common themes in unsure comments</b>	Final impacts are unclear – not enough information is provided in the amendments..
<b>Response</b>	General support was expressed for the proposed amendments. Comments not in support raised genuine concerns that will require strategic planning and ongoing management to ensure impacts are minimised. This is beyond the remit of a management plan.

**Table 4d – Analysis of survey responses – Q4**

<b>Question</b>	Do you support the proposal to permit 4WD tours in the park, assessing permits on a case-by-case basis?
<b>Support %</b>	23.6%
<b>Not support %</b>	67.3%
<b>Unsure %</b>	9.1%
<b>Common themes in comments that did support amendments</b>	Only guided tours should be allowed, on a case by case basis. Must stay on tracks. Gets less able visitors in the area. Brings visitors.
<b>Common themes in comments that did not support amendments</b>	4WDs are polluting in noise, in diesel, and tyres will disrupt the landscape. The park is too small for this activity to occur alongside walking and cycling. Vehicles would disrupt the ecology of the area.
<b>Common themes in unsure comments</b>	Unclear how impacts will be managed
<b>Response</b>	The amendments have been changed to include greater conditions around 4WD tours. This will ensure they only occur under strict conditions. Should impacts still be observed over time, licences to conduct 4WD tours will not be allowed.

**Table 4e – Analysis of survey responses – Q5**

<b>Question</b>	Do you support the proposal to develop mountain bike trails in areas other than Willowie Forest, the Warren Bonython Link Lands and Mambray Creek campground?
<b>Support %</b>	74.1%
<b>Not support %</b>	20.4%
<b>Unsure %</b>	5.6%
<b>Common themes in comments that did support amendments</b>	Mountain biking is an excellent way to get people into nature and exercising, and these changes will help increase the appeal of mountain biking in the region.
<b>Common themes in comments that did not support amendments</b>	Bikes can increase damage to trails and cause erosion and weed ingress. Concerns about harm to walkers from shared trails.
<b>Common themes in unsure comments</b>	The map does not clearly show where the additional trails are to be developed
<b>Response</b>	General support was expressed for the proposed amendments. The amendments and existing management plan contain provisions to ensure bike trails are developed sensitively, and in collaboration with local stakeholders. Some deliberation will be required in determining areas around Mambray Creek for mountain bikes, given the level of support for dedicated hiking tracks in that area.

**Table 4f – Analysis of survey responses – Q6**

<b>Question</b>	Do you support the proposed amendment to allow for the culling of western grey kangaroos when it is the only practicable method of control as part of a strategy to manage the total grazing pressure in Mount Remarkable National Park?
<b>Support %</b>	63.6%
<b>Not support %</b>	16.4%
<b>Unsure %</b>	20.0%
<b>Common themes in comments that did support amendments</b>	Culling should only occur as long as it is strictly necessary. Feral management should be treated as a priority. Utilising the carcasses should also be explored.
<b>Common themes in comments that did not support amendments</b>	Only non-lethal options should be used, such as relocation.
<b>Common themes in unsure comments</b>	Unsure of the impact of kangaroos on the environment.
<b>Response</b>	Non-lethal control measures can be infeasible in some cases where numbers are high. In addition, non-lethal control can cause other forms of harm to animals. The amendments ensure non-lethal forms of control are still considered and focussed on as a priority, but provides that culling can be used if necessary.