

# Analysis of public submissions

## Summary

to the

Perup Draft Management Plan 2011

Department of Environment and Conservation

Conservation Commission of Western Australia

## 1. INTRODUCTION

This document is a summary of the analysis of public submissions (APS) to the *Perup draft management plan 2011* (the draft plan) (DEC 2011). It presents key issues and themes within the parks and reserves in the Perup area, as depicted by submissions received on the draft plan. This APS informs the final management plan, where the draft plan has been amended to reflect submissions received as assessed by the criteria below.

The draft plan was released for public comment by the Minister for Environment from 31 March 2011 to 3 June 2011. A notice of the draft plan's release was published in the *Government Gazette* on 1 April 2011. Late submissions were accepted where arrangements had been made prior to the closing date.

Following release of the plan for public comment, advertisements were placed in two editions of *The West Australian*, *Manjimup-Bridgetown Times*, *Donnybrook-Bridgetown Mail* and the *Franklander* advising that the draft management plan was available for comment. The draft plan was distributed to relevant state and local government agencies, community groups, libraries and numerous individuals who expressed interest or were involved during the planning process. Copies of the plan were available for viewing at Department of Environment and Conservation (DEC) offices (Kensington, Atrium, Manjimup and Pemberton) and local government offices (Boyup Brook, Bridgetown, Cranbrook and Manjimup). Copies of the draft plan and maps were also available on DEC's website. In a new planning initiative, notice about the release of the plan was also uploaded onto *Twitter* and *Facebook*.

## 2. METHODOLOGY

All submissions were collated into a table for the analysis. Many public submissions received made comments on a number of issues. The comments made in each submission were collated according to the chapter and section of the draft plan they addressed. Comments were summarised based on what the main point of the comment was.

For most comments, a note was made alongside each comment about why the point did not result in an amendment to the final plan, or what action was taken in the final plan.

Comments made in submissions have been 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 could give cause to elevate the importance of any submission above another.

Each comment was assessed using the following criteria, which were outlined in the draft plan:

1. The draft management plan **was amended** if the comment:
  - (a) provided additional information of direct relevance to management
  - (b) provided additional information on affected user groups of direct relevance to management
  - (c) indicated a change in (or clarified) government legislation, management commitment or management policy
  - (d) proposed strategies that would better achieve management objectives
  - (e) indicated omissions, inaccuracies or a lack of clarity.
2. The draft management plan **was not amended** if the comment:
  - (a) clearly supported proposals in the plan
  - (b) made general statements and no change was sought
  - (c) made statements already in the plan or that were considered during the plan preparation
  - (d) addressed issues beyond the scope of the plan
  - (e) was one among several widely divergent viewpoints received on the topic, but the text/strategies in the plan were still considered the preferred option
  - (f) contributed options that were not feasible (generally due to conflict with existing legislation, government policy, lack of resource capacity or lack of research knowledge to make decisions)
  - (g) was based on unclear, factually incorrect information
  - (h) provided details that were not fitting or necessary for inclusion in a document aimed at providing long term management direction.

### 3. SUMMARY OF SUBMISSIONS

#### 3.1 About the submitters

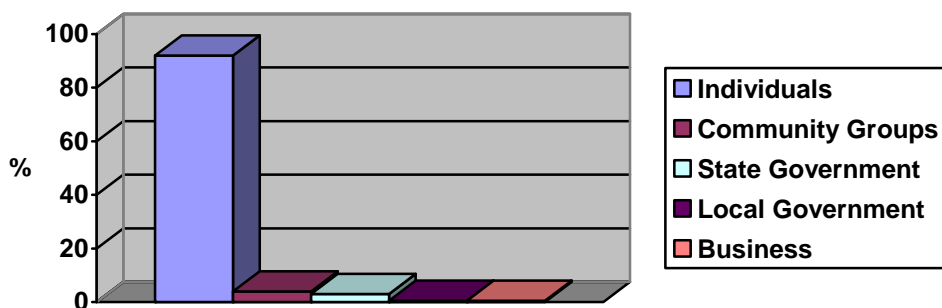
##### Numbers of submitters

A total of 250 public submissions were received. Of these, 212 were proforma submissions supporting the comments on the plan submitted by the Bridgetown-Greenbushes Friends of the Forest.

##### Category of submitters

The majority of submissions (proformas included) were received from individuals (Figure 1). Only one of the four local governments that covered the planning area made a submission.

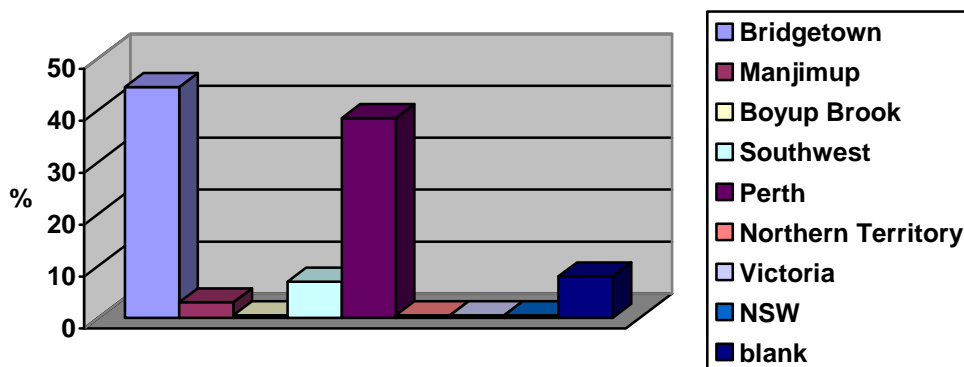
**Figure 1. Category of submitters**



##### Location of submitters

Most submissions were from people or organisations that were local (i.e. within the Shire of Bridgetown-Greenbushes), although there were a reasonable number received from Perth metropolitan submitters (Figure 2). There were also some submissions received from interstate (Northern Territory, Victoria and New South Wales).

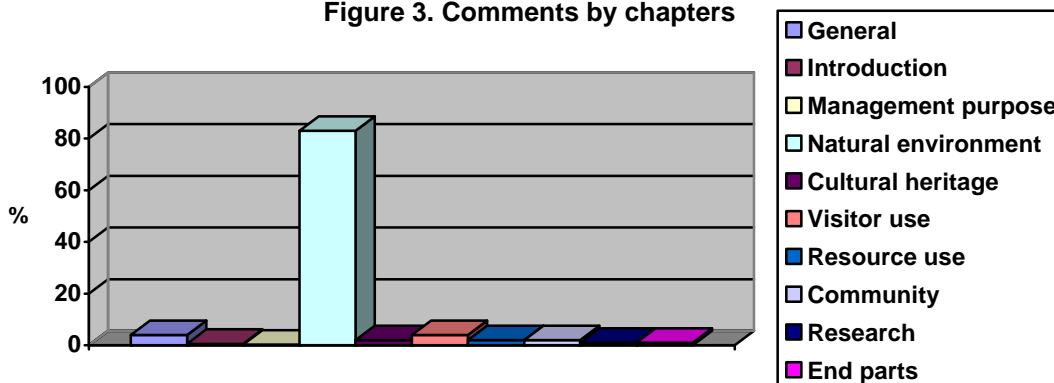
**Figure 2. Location of submitters**



##### Comments on chapters

In total, there were 338 comments received (from the 250 submissions) on the draft plan. The majority of comments received (83 per cent) were associated with issues to do with ‘Managing the Natural Environment’ (Figure 3). If proforma submissions are excluded (which were solely about one issue in the ‘Natural Environment’ chapter), the majority (56 per cent) of comments still relate to this chapter, followed by general comments (11 per cent) and comments on visitor use (10 per cent).

**Figure 3. Comments by chapters**



## 3.2 Key issues

The key issues of concern by the public and the range of views on each issue are described below, together with how the plan was amended in response to submission comments. The key issues include:

- ❖ the conservation reserve system
- ❖ key performance indicators
- ❖ invasive plants and animals
- ❖ diseases
- ❖ fire
- ❖ Aboriginal cultural heritage
- ❖ horseriding
- ❖ community involvement
- ❖ beekeeping
- ❖ management plan name.

### Conservation reserve system

Taking into account the proforma submissions, most of the comments (69 per cent) were concerned that parts of the Warrup forest block are not included in the Greater Kingston National Park, that this area was wrongly left out of the establishment of the park in 2004 and should now be included in this park. Two other comments were similarly concerned with Coonan 5 block and requested this become a nature reserve.

The plan has not been amended in response to these submissions/comments as these issues are beyond the scope of the plan. These submissions have been referred for consideration during the review of the Forest Management Plan.

### Key performance indicators

Many comments (mainly from one submitter) requested more key performance indicators (KPIs) across most sections of the plan because it was not apparent that there was enough detail to show whether management is moving towards fulfilling the vision and desired outcomes.

A review of KPIs in the plan has resulted in the addition of six new KPIs, a change in four KPIs and the deletion of one KPI. Only some of these changes from the draft management plan were made in response to submissions (for example, diseases).

### Invasive plants and animals

About four per cent of comments were concerned with invasive plants and animals, in particular the need to control Patterson's curse and cape tulip, ducks and corellas, cats and foxes, pigs, deer and horses. There was objection to the use of sporting shooting associations in the control of feral animals, but there was also praise for the pig control program implemented by the Lake Muir–Denbarker Pig Eradication Group. In most cases, the plan covers the management of these species, and there is a specific emphasis in the plan on the control of cape tulip, foxes, cats, pigs, deer and horses.

There was some concern about the need to control populations of ducks and corellas, which are causing damage to crops and stress to farmers in the area. However, 'ducks' is a broad term that covers many species that are covered

under the *Agriculture and Related Resources Protection Act 1976* and/or the *Wildlife Conservation Act 1952*, and the plan broadly allows for the appropriate control or protection, whichever is relevant to the species concerned. Similarly, a suggestion of “joint baiting operations for foxes between farmers and DEC, with baits supplied by DEC” is an operational issue that should be addressed by the District, and the plan allows for this.

The plan has been amended to include ‘local landholders’ in the strategy regarding the control of feral horses.

### **Diseases**

There was some concern about the management of *Phytophthora* dieback, and that there are no KPIs in the plan that can measure whether the plan is successful in meeting the desired outcomes and measuring the extent of diseased areas.

The plan was amended to include an objective and KPI in line with recent Conservation Commission advice. Strategy 4 was also amended to qualify where ‘protectable areas’ will be identified and established (i.e. where there is a risk of introduction and spread of the disease that will adversely impact on the protectable area).

### **Fire**

Most of the three per cent of comments about fire were concerned with prescribed burning. While there was concern about the need for more burning, there was also concern about the need for less burning, a more precautionary approach in the face of insufficient knowledge about fire and maximising the area of long unburnt vegetation. A number of references were used in support of the latter views. There was also a view expressed by some submitters about the need for increased liaison with neighbours and key stakeholders during the preparation of burning programs. The range of views expressed reflect the importance of this issue to the general community.

In most cases, the plan covers the issues about fire raised in submissions, and was considered to still be the preferred option in the face of the range of divergent views. Most of the references quoted in the submissions were either out of context or too abstract for the planning area. The plan was amended to include a new KPI for ‘the impact of fire on human life’ in response to the concern about the need for a KPI for “any loss of life or property due to fire”. The plan was also amended by changing the biodiversity KPI to ‘measurable biodiversity objectives and success criteria in prescribed burn plans’.

### **Aboriginal cultural heritage**

One submission detailed a considerable amount of information about Aboriginal heritage sites in the area, and many concerns about how the plan did or did not cover aspects of Aboriginal cultural heritage.

The submission prompted a full review of heritage sites, and the plan was amended to more accurately describe the current situation with Aboriginal and other Australian cultural heritage sites. The submission also prompted some amendments to the structure and content of the chapter. These amendments take into account the submission’s comment about water being an “important locational factor for Aboriginal sites” and “The plan does not recognise that all sites, known or yet to be recorded, are protected by the provisions of the *Aboriginal Heritage Act 1972*”. The amendments also take into account joint management and customary activities.

### **Horseriding**

Of the few comments that covered the issue of horseriding, all were concerned about the activity’s “adverse environmental impacts”. It also seems that submitters were confused about the extent of horseriding in the area and what was proposed, given statements like “Horseriding should not be allowed to continue or be established in the area” and “It seems horseriding trails could be retained, and it is suggested that the incorporation of more areas for horseriding activities is discouraged”.

The plan was amended to generally describe the extent of this activity being considered, and more specific guidance on how the activity may be permitted to occur.

### **Community involvement**

From the two per cent of comments relating to community involvement, there was a sense that the community wanted to be more involved with DEC in working cooperatively (in partnership) to manage reserves and to foster better working relationships. However, there was concern that the “control of pest animals, weeds and wildfire has been dramatically under-funded and the implementation of control has not been effective enough to claim ‘good neighbour’ status”.

The plan has not been amended as a result of these submissions, however the information will be passed on to the relevant managers, and the existing strategies broadly cover the ability to work cooperatively (in partnership) to manage reserves and to foster better working relationships.

### **Beekeeping**

One submission required further information about the status of beekeeping in the planning area, and whether this has been discussed with DEC's Bee Industry Consultative Committee and affected beekeepers. However, there were no other submissions relating to this issue.

The plan has been amended to provide further supportive information on the status of beekeeping in the planning area, further detail to help clarify the direction for beekeeping on the conservation reserves, and several strategies to guide management of beekeeping. The issue of consultation with the beekeeping industry is being addressed.

### **Management plan name**

Some comments were concerned that the name of the management plan does not reflect the significance of other parks and reserves and misleadingly suggests that the plan applies only to the immediate Perup area. A suggestion was put forward to alter the name to "Greater Kingston and Lake Muir national parks and Tone-Perup nature reserve (including the Unicup, Cobertup and Quindinup and other smaller nature reserves".

The Conservation Commission has adopted three overall principles to guide the preparation of management plans (see [www.conservation.wa.gov.au](http://www.conservation.wa.gov.au)). The Conservation Commission's principle of a 'regional approach' requires planning areas to cover a suite of reserves within geographical areas (identified by the Commission) rather than individual reserves. The name for management plans that cover these 'suite of reserves within geographical areas' is agreed between DEC and the Conservation Commission.

In December 2009, comments were sought from community stakeholders (most of whom attended the community focus group workshops held earlier in that year) on the name of the draft management plan, which was at the time the 'Muir Planning Region'. Despite the strong community attachment to some individual reserves (for example, Greater Kingston National Park and Lake Muir Nature Reserve), there was a variety of options preferred, with no clear preference. At its meeting of 12 July 2010 the Conservation Commission endorsed 'Perup' as the new name for the plan upon the recommendation of its Management Planning Review Committee. The name 'Perup' is the Noongar name for the area derived from "pirap" meaning "finger" (Milne 1992), and acknowledges Aboriginal connection with country and involvement in planning. Therefore, the plan was not amended in view of the Commission's decision to adopt the name 'Perup' for the management plan.

## **4. REFERENCES**

DEC (2011) *Perup Draft Management Plan 2011*. Department of Environment and Conservation, WA. Available from [www.dec.wa.gov.au/content/view/6425/1559/](http://www.dec.wa.gov.au/content/view/6425/1559/).

Milne (1992) *Ups and Ings: Aboriginal place names of south western WA*.