



# Analysis of Public Submissions

## Northern Lofty Woodland Parks Draft Management Plan 2024

The Northern Lofty Woodland Parks Draft Management Plan was released for public consultation from 31 May to 2 September 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.

18 submissions were received, including 5 written responses and 13 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	Erik Dahl	Ranger (Retired)
2	Merinda Hamman	Local community member
3	Elisa (surname not supplied)	Interested individual, park visitor
4	Dr M	Local community member, park neighbour, environmental volunteer, interested individual
5	Daniel (surname not supplied)	Park visitor
6	Doug A	Local community member, environmental volunteer, interested individual
7	Mike Thompson	Interested individual
8	Name not provided	Park visitor, interested individual
9	Alex Wilson	Local community member, park visitor, environmental volunteer, interested individual
10	Name not provided	Park visitor, local community member, interested individual
11	Name not provided	Interested individual
12	Chris Penfold	Park visitor, local community member, interested individual
13	Name not provided	Park visitor, interested individual, environmental volunteer
14	Name not provided	Park visitor, interested individual, environmental volunteer
15	Glen Brittain	Park visitor, local community member, interested individual, environmental volunteer
16	Dr S Petit	University of South Australia
17	Miranda Tenney	South Australian Apiarists' Association
18	Joan Gibbs	Mid Torrens Catchment Group



Table 2: Analysis of feedback

Number	Comment	Submission Number	Plan Altered	Response	Criteria
<b>General</b>					
1.	Provided general support for the direction of the plan.	1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17	No	Submission supported the plan with no changes sought.	4
2.	Expressed general concern for dog walking and cycling (legal and illegal) in parks.	8	No	Noted. These parks do not permit dogs or cycling. Unauthorised activities are monitored as part of ongoing park management.	9
3.	Suggested greater detail to be included within the regional map (camping and accommodation sites, trails, habitat types, main road names, land tenure).	1	No	Maps within management plans are primarily for geographical reference, more detailed maps are available on the DEW website.	7
4.	Expressed a need for greater recognition and resources for landholders doing revegetation work on their properties.	4	No	Funding and resource allocation is beyond the scope of the plan. The management plan only relates to activities within proclaimed parks.	6
5.	Expressed concerns regarding light, noise and air pollution.	13	No	These concerns are noted. Feedback was a general statement and was not referenced in the context of the parks covered in this plan.	9
6.	Recommended creating 'Quiet Parks' to benefit humans and wildlife.	13	No	This suggestion is noted. Feedback proposed an alternative approach, but the recommendation of the draft plan was still considered the most appropriate option.	6
7.	Suggested exploring expanding the parks into neighbouring properties.	9	No	It is not the role of a management plan to guide park expansion. DEW has an ongoing program for additions to the reserve system and is committed to acquiring strategic land parcels to add to the reserve system where resources allow.	9
8.	Recommended increased funding for volunteer groups and bush care contractors.	14, 15	No	Funding and resource allocation is beyond the scope of the plan.	6



9.	Expressed concerns over a proposal to develop cycling tracks between Hale and Warren Conservation Parks.	15	No	Noted. These parks do not permit cycling. Unauthorised activities are monitored as part of ongoing park management.	9
10.	Requested continued access to existing bee sites and possible lost sites.	17	No	All apiary activities must comply with the DEW Apiary (Beekeeping) Policy and assessment of any future sites will be required to comply with the DEW Apiary Site Assessment Framework.	6
11.	Expressed concerns over the potential future impacts of the Varroa destructor on bee colonies.	17	No	Outside the scope of this management plan.	6
12.	Requested access to a number of bee sites statewide to provide diversity of floral resources.	17	No	Outside the scope of this management plan. All apiary activities must comply with the DEW Apiary (Beekeeping) Policy and assessment of any future sites will be required to comply with the DEW Apiary Site Assessment Framework.	6
13.	Expressed the view that Macquarie River Turtle ( <i>Emydura macquarii</i> ) is not native to Cudlee Creek, conservation of the species should not be encouraged and there may be concerns for the impact of this on local turtle species ( <i>Chelodina longicollis</i> ).	7	Yes	References in the text to the Macquarie River Turtle ( <i>Emydura macquarii</i> ) have been removed. Local turtle species, <i>Chelodina longicollis</i> has not been included as it is not considered a conservation priority for this plan.	3
14.	Noted that on Page 9 that <i>E. macquarii</i> is specifically mentioned. While it is listed as a state-vulnerable species (which it is in its native range), note should be made that it is not endemic to the Torrens.	7	Yes	References in the text to the Macquarie River Turtle ( <i>Emydura macquarii</i> ) have been removed.	3
15.	Recommended that Appendix 2 include <i>Emydura macquarii</i> (Macquarie River Turtle), in the alphabetized list.	7	Yes	References in the text to the Macquarie River Turtle ( <i>Emydura macquarii</i> ) have been removed.	3
16.	Suggested the size of each park should be included in the text describing them.	16	No	Already listed under the 'Directions for management' and placement is consistent with other management plans.	7



17.	Suggested 7 parks in one management plan is too general and recommended more detailed and specific directions for each park.	16, 18	No	Park management plans provide strategic direction for management of the park. Incorporating these parks into a single plan enables strategies to be applied across the landscape and supports a coordinated and consistent approach to park management across the North Lofty District. Detailed and prescriptive information, such as management actions for individual parks are provided in subordinate plans such as operational plans.	6
18.	Expressed the view that a more comprehensive plan is required in cooperation with other stakeholders (eg. Landcare, SA Water, forestry SA, landholders and community and government agencies).	18	No	A comprehensive stakeholder engagement process was undertaken in the development of this management plan. Statutory public consultation also allowed additional opportunities to provide feedback on the draft plan.	5
19.	Recommended that land adjacent to conservation parks be protected from subdivision.	14	No	Outside the scope of this management plan. DEW has an ongoing program for additions to the reserve system and is committed to acquiring strategic land parcels to add to the reserve system where resources allow.	9
20.	Expressed the view that specific details be included on how the park will be managed and cared for.	16	No	Park management plans provide strategic direction for management of the park. Detailed and prescriptive information, such as management actions are provided in subordinate plans such as operational plans.	6
21.	Suggested the Appendices headings be amended to 'plant species' and 'animal species'	16	No	The appendices have been labelled to be consistent with other park management plans.	7
22.	Expressed the view that the document has an absence of peer-reviewed references.	16	No	Park management plans are high-level, strategic policy documents. They are informed by the best available scientific information. They are not designed to reference the full extent of all resources in the format of an academic research paper. A bibliography of some of the key resource material is provided in the plan – this is not intended to be an exhaustive reference list.	7



<b>Park significance and purpose</b>					
23.	Suggested greater detail on the unique features of each park and their specific management issues.	18	No	The management plan contains specific sections that explain the significance and purpose for each park included in the plan. These parks are in proximity and have similar ecological and geographical features. They are subject to the same range of issues. Detailed and prescriptive information, such as management actions for individual parks are provided in subordinate plans such as operational plans.	7
<b>Challenges and opportunities</b>					
24.	Expressed the opinion that details on how challenges and opportunities will be addressed should be included in the plan.	16	No	How challenges and opportunities will be addressed is covered throughout the themes, objectives and strategies in the plan at a strategic level. Detailed and prescriptive information, such as management actions for individual parks are provided in subordinate plans such as operational plans.	6
<b>Theme 1: Conserving biodiversity in a fragmented landscape</b>					
25.	Suggested increasing the connectivity between protected areas and efforts to rehabilitate native habitat and reduce fragmentation.	4, 16	No	Outside the scope of this management plan. DEW has an ongoing program for additions to the reserve system and is committed to acquiring strategic land parcels to add to the reserve system where resources allow.	7



26.	Suggested increased First Nations-led land management to reduce fire risk.	16	No	The Department is committed to partnerships with First Nations people and has a range of policies and programs to support more partnerships with First Nations, including within the fire management program. Many parks across the State are co-managed with native title holders. Dedicated Aboriginal Ranger positions also support First Nations representatives to maintain, promote and sustain traditional cultural sites and practices within parks.	6
27.	Expressed support for humane control of kangaroos when required to achieve ecological benefits.	1	No	No change necessary. Feedback supports direction in the plan.	4
28.	Expressed support for controlled burns for bush fire prevention.	17	No	Feedback is in support of the plan. No change necessary.	4
29.	Expressed concern regarding prescribed burning methods.	4, 14, 16, 18	No	The department uses prescribed burns to help lessen the intensity and spread of future bushfires, make suppression more achievable and safer, and as an ecological tool to maintain or improve the biodiversity of the bush while consuming hazardous fuels. NPWS fire management plans help guide fire management activities in South Australian parks.	9
30.	Suggested improvements to feral fox and cat control measures.	6	No	The plan identifies that vertebrate pest control will be undertaken to protect and support the recovery of threatened species. Pest animal control is an ongoing priority for park management and is planned and managed at an operational level.	9
31.	Recommended that pest plant management be a key priority.	9	No	Pest plant control is an ongoing priority for park management and is planned and managed at an operational level.	9
32.	Expressed the view that kangaroos are restricting the establishment and growth of native species.	12	No	Feedback is in support of the plan. No change necessary.	4
33.	Recommended that it be made clear that fire aggravates phytophthora infestation, by weakening plants therefore becoming more vulnerable to infection.	16		Outside the scope of this management plan. Environmental assessments are an integral part of fire management planning and prescribed burns. Assessments consider factors such as the outcomes for threatened species, pest plant and animal impacts, and the role fire plays in certain ecosystems.	6



34.	Opposed to current prescribed burning methods and suggested section on fire used as an 'ecological tool to maintain and improve the health of habitats' be remove in its entirety.	16	No	The department uses prescribed burns to help lessen the intensity and spread of future bushfires, make suppression more achievable and safer, and as an ecological tool to maintain or improve the biodiversity of the bush while consuming hazardous fuels. NPWS fire management plans help guide fire management activities in South Australian parks.	7
<b>Objective 1: Protect ecosystem health by enhancing habitat and managing key threats.</b>					
35.	Expressed the opinion that kangaroos should not be culled in parks or via the commercial harvest industry.	4, 16, 18	No	Noted. The humane culling or harvesting of native animals is a valid and necessary management tool under the <i>National Parks and Wildlife Act 1972</i> . All kangaroos culled or harvested are done so in accordance with either the National Code of Practice for the humane shooting of kangaroos and wallabies for Commercial Purposes or Non-Commercial Purposes.	7
36.	Recommended that monitoring programs be covered in greater detail.	18	No	Monitoring is addressed in Theme 1. Specific requirements will be developed at the operational level and not required in a strategic document of this nature.	6
37.	Expressed the view that using the <i>EPBC Act 1999</i> to inform conservation decisions is not an effective management strategy.	16	No	All relevant legislation is considered when developing park management plans. They are informed by the best available scientific information from multiple sources.	7
<b>Theme 2: Visitor management</b>					
38.	Suggested visitation be minimised to reduce disturbance to wildlife.	4	No	Managing visitation while maintaining conservation values is addressed in the management plan.	5
39.	Expressed concerns over human activities in parks.	4, 13, 14	No	All human activities within parks are monitored and managed at an operational level.	6
40.	Expressed a lack of recreation areas and recommended improving parks to be used for other activities.	2	No	No change. Submission did not provide sufficient detail describing what type of recreation area or activities.	9
41.	Recommended that disability access be considered.	10	No	Disability access in parks is considered in the DEW Disability Access and Inclusion Plan.	9





42.	Recommended that areas of high conservation value be excluded from visitor access and recreational activities.	14	No	The plan considers the impact of these issues on conservation values in Theme 2.	9
43.	Expressed the view that conservation should be prioritised over any demand for future development in the parks.	14, 15, 16	No	Feedback is in support of the plan. Any future development must ensure conservation values are not compromised.	4
44.	Expressed support for improved protection of First Nations cultural sites.	16	No	Feedback is in support of the plan. No change necessary.	4
45.	Expressed the view that lessees be named p.23.	16	No	Detailed and prescriptive information is outside the scope of a strategic document of this type.	7
46.	Recommended increased opportunities for recreational four-wheel driving access.	5	No	Four-wheel driving is not currently permitted in the parks and is not envisaged to be allowed in the future.	7
47.	Recommended upgrades to facilities (day visitor areas and interpretive signage) to improve education and community support.	18	No	Funding and resource allocation is beyond the scope of the plan. Additional visitor facilities may be considered if community sentiment and visitation show a demand. Any future development must ensure conservation values are not compromised.	7
<b>Objective 2: Provide appropriate low-impact opportunities for recreation and experiences in nature where risks to ecological values can be minimised, and cultural sites and values are protected.</b>					
48.	Expressed the view that eco-tourism events may be causing damage to sensitive environments.	15	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
<b>Strategies</b>					
49.	Recommended visitor strategy should be improved to increase use and awareness of parks and increase education opportunities.	2, 9, 18	No	The management plan includes strategies to support low-impact opportunities including education, recreational use and development of facilities where impacts can be managed sustainably.	5

**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. Where survey respondents did not provide additional text for questions 5 to 13, the respondent's feedback has been interpreted by the level of support indicated for the themes and objectives in questions 5 to 10.

Number	Question	Question type
1	What is your suburb	Open text
2	What is your relationship with these parks?	Checkbox
3	Do you support Theme 1: Conserving biodiversity in a fragmented landscape, or have any comment on how they could be improved?	Checkbox and open text
4	Do you support Theme 2: Visitor management, or have any comment on how they could be improved?	Checkbox and open text
5	Do you support Objective 1: Protect ecosystem health by enhancing habitat and managing key threats, or have any comment on how they could be improved?	Checkbox and open text
6	Do you support Objective 2: Provide appropriate low-impact opportunities for recreation and experiences in nature where risks to ecological values can be minimised, and cultural sites and values are protected, or have any comment on how they could be improved?	
7	Finally, are there any other matters about the management of the parks in the northern Mount Lofty Ranges more generally that you would like considered in finalisation of the plan?	Open text