

Kalgulup Regional Park

summary of issues from public submissions
to the draft management plan

2021



Various parts of the regional park appear in this photo from Bar Island at the entrance to the Collie River between Pelican Point and Point Douro, with the Preston River mouth (left) and The Cut (right) in the background.
Photo – Shem Bisluk/Department of Biodiversity, Conservation and Attractions

1. INTRODUCTION

On 13 August 2020, *Kalgulup Regional Park draft management plan 2020* (draft plan) was released by the Minister for Environment for a two-month public submission period, which closed on 15 October 2020. A total of 37 submissions were received.

This document summarises the key issues raised in the public submissions and will aid in considering the approval of the plan under s59A(1) of the *Conservation and Land Management Act 1984* (CALM Act).

2. PLAN DISTRIBUTION

Coinciding with the release of the draft plan, a public notice about the proposal was published in the *Government Gazette*, as well as *The West Australian*, *South Western Times* and *Bunbury Mail* newspapers, as required under s57(2) of the CALM Act.

The draft plan was distributed to relevant Ministers, State Government departments and local government authorities as per s59 of the CALM Act.

Notifications of the release of the draft plan were also distributed to stakeholder groups as well as those groups and individuals who expressed an interest during the planning process.

Copies of the draft plan were made available at the Bunbury and Kensington offices of the Department of Biodiversity, Conservation and Attractions (DBCA), as well as the City of Bunbury, Shire of Capel, Shire of Dardanup and Shire of Harvey local government offices.

DBCA's website was used to notify the public about the proposal and submission period along with digital copies of the draft plan and a SurveyMonkey online submission form, where interested parties were encouraged to lodge submissions. Interested viewers could read and submit comments via at least four different web pages: 'Draft plans open for comment' page, 'Have Your Say' page, 'Kalgulup Regional Park' page and via media stories. Temporary signs were also erected at strategic locations throughout the regional park, providing notification of the proposal and where further information could be accessed.

3. SUBMISSION PROCESSING AND ANALYSIS METHODOLOGY

A total of 37 submissions were received consisting of 13 written submissions (received via email or post) and 24 online SurveyMonkey forms. In some cases, SurveyMonkey submissions were followed up with a written submission either as a copy of the online submission or supplying further information.

Information was recorded relating to the submitter's contact details and location, submitter type/interests (e.g. conservation, recreation) and submitter comments or key issues identified. Once the data entry was complete, statistics were generated on several aspects of the public submissions including an overview of submitter demographics, an explanation of the key issues raised in submissions, and a summary of key issues by chapter/sector. This report describes these results.

4. WHO PROVIDED FEEDBACK

Of the 37 submissions received, most (54 per cent) were from private individuals, with 24 per cent from state government agencies, 16 per cent from non-government organisations or community groups, and five per cent from local government (see Appendix 1).

Most submitters (62 per cent) were locally based. Most of the remaining submitters were based in the Perth area (27 per cent), although there were two other regionally based submissions and two from interstate.

The 37 submissions received translated to 234 comments of which 28 per cent of the comments were neutral or supportive in nature (consistent with the concepts presented within the draft plan) or they clearly addressed issues outside the scope of the draft plan. 20 per cent of the remaining comments resulted in an amendment to the final *Kalgulup Regional Park management plan* (final plan).

5. KEY ISSUES

In general, 65% of submitters were supportive of the plan or its parts or made neutral statements about the plan. Overall, there was strong support for establishment of the park. While only 12 submitters made comments that resulted in changes to the plan, there were many comments (52 comments) attributed to these submitters that resulted in an amendment to the plan.

The issue that generated the most discussion related to dogs, although other areas of strong interest to submitters included proposing additional lands to add to the park, vehicle access and management of weeds. The remaining comments were spread among the other components of the draft plan. In many instances, there was significant overlapping of issues such as access and dogs, and in these cases unless there was clear direction in submissions, a judgment call was made on the most relevant section of the plan that the comment applied to. Not all amendments to the plan or cases where the plan was not amended are described in this document, which is a summary of the main themes.

5.1 Purpose of the plan

This section of the plan was amended in relation to two comments: one which raised the issue that there was no outline of the history of the origin and establishment of the park and its parts, which resulted in a new sub-heading and a summary of the establishment history of the park being added, and one that questioned the meaning of the word 'prevail' and the plan's relationship with the previously described plans and reports, which resulted in some minor amendments to replace this word and clarify the relationship with these other plans and reports.

5.2 Park values

Several comments suggested that the plan should include all, or a more comprehensive list of, values. The strategic-level plan only describes the main values and activities, especially those that may have international, national, state or regional significance, and it is not intended to capture a full inventory of these. However, the plan was amended to include or expand on scientific, landform and scenic values. It was also suggested that values and activities listed both in this section and at other places throughout the plan should be re-ordered to show the relative importance, priority or impact and or described as limited. The plan was not amended in this regard as the listing of values and activities contains no form of ranking and the plan only intends that the main values and activities are listed. Describing some activities as being limited may be a value judgement, and the park is an important community resource for a range of activities that are balanced with impacts. The plan provides flexibility for activities to change over time.

5.3 Land tenure and boundaries

Five submitters made suggestions for adding specific areas of land into the park, including around Point Douro, along the Collie River and College Grove. The plan describes a range of factors that influence or determine the ability to add lands into the park including whether the land has regionally significant values, whether the land is reserved for Regional Open Space (ROS), landowner willingness to sell and available resources. The plan was not amended as the plan provides for the potential future addition of lands that meet these criteria. Moreover, most of the suggested additions to the park are not currently zoned ROS under the Greater Bunbury Region Scheme (GBRS).

5.4 Park management

One submitter was concerned about the large number of organisations and government agencies that manage portions of the regional park, which is suggested may lead to discrepancies in management decisions and implementation, confusion for community and stakeholders about who to contact regarding management issues, and inadequate resources being put towards the regional park by the relevant management organisations. In response to this, the multi-agency management model for regional parks has been operating in Perth's regional parks since the late 1990s, and while not a land tenure, regional parks provide the opportunity for a consortium of land managers to develop coordinated management approaches. The management plan has been approved by all relevant local and State government land management agencies as a consistent overarching framework for management of the park that will be complimented by further park guidance and ongoing working arrangements. As such, the plan was not amended in relation to this point.

Two submitters suggested that conditions be applied to property developments to include the provision of recreational areas, buffers and fire management strategies within the development envelope rather than the park having to provide for these. The plan was not amended as it is noted on page 22 of the plan that any new developments must address bushfire statutory planning requirements under State Planning Policy 3.7 and the associated Guidelines, which include provision of setbacks and building standards.

5.5 Geology, landforms and soils

One submitter suggested Map 3a be amended to include both of the Spearwood Dune and Bassendean Dune interfaces in College Grove as described in the text. The submitter also suggested that Map 3a be amended to include Eedle Creek to reflect the alluvial landform development. The section has been re-worded to match the interpretation as portrayed in the vegetation mapping, and to note the unusual dune interface at College Grove and indicate that perhaps this may be a re-working of the two landforms as proposed by Bischoff (2013). Map 3a has not been amended in relation to landforms as the theory that Tuart represents the Spearwood landform and that Banksia without the presence of Tuart represents the Bassendean landform is not supported botanically or in any geological or soil science publications. However, Eedle Creek has been added to Map 3a.

5.6 Hydrology

Two submitters suggested that all significant wetlands in the park should be reserved with DBCA. The plan has not been amended as most of the significant wetlands are already managed by or are proposed to be managed by DBCA, with a small number remaining with other agencies or being subject to future planning decisions. One submitter also suggested adding Eedle Creek to the table of wetlands. A review of the table resulted in amending the information to more accurately describe wetlands within park areas, the wetland type, UFI number and their management category, including Eedle Creek.

One submitter discussed erosion in relation to the Collie River suggesting that the water quality of Collie River should be improved and that boating erosion along the Collie River should be controlled. The plan was not amended as the lower Collie River waterway is not part of the park, and priorities for management of erosion will be based on the outcome of further studies and planning. The regulation of boat speeds is the jurisdiction of Department of Transport.

Text within the 'Groundwater-dependent ecosystems' sub-section was amended in response to one submitter's query about potential cumulative impacts to clarify that "If a licence application to take water near these groundwater dependent ecosystem sites for commercial purposes is submitted, the need for and level of detail required to support an assessment to determine any adverse effects to these sites will be in accordance with DWER's Operational policy No. 5.12 - Hydrogeological reporting associated with a groundwater well licence (DoW 2009b)".

There was a question about whether projected population growth has been considered in terms of increased demand for potable water and the potential impacts on groundwater dependent ecosystems. Allocation plans developed by the Department of Water and Environmental Regulation set out how much water is available from a particular resource or area and how much water needs to be left in the system to ensure its sustainability. Water allocation planning is based on scientific evidence and involves a significant amount of research and stakeholder consultation. One of the key outcomes from this is to manage water resources and acknowledge the needs of water-dependent environments as part of future climate scenarios. Water currently reserved in the Bunbury Groundwater Area may only just meet projected demand to 2060 beyond current entitlements for the existing Dalyellup, Bunbury, Eaton, Australind, Boyanup and Dardanup schemes. However, potential future water demand following development at Wanju, combined with estimated demand from the existing schemes, results in a total projected demand greater than the current licensed entitlements and water reserved for public water supply. The plan has not been amended because, while there is a need to investigate alternative sources to meet shortfalls in supply to meet future potable demands in a timely manner, this is outlined in the Draft Bunbury-Geographe sub-regional strategy (2020).

One submitter made comments about salinity in Hay Park in relation to changes in drainage and flooding of Five Mile Brook and the continuous watering of Hay Park's playing fields. Five Mile Brook is not a proclaimed surface water system under the *Rights in Water and Irrigation Act 1914* nor the *Waterways Conservation Act 1976*. Five Mile Brook provides flood relief to the immediate adjacent urban areas and any changes would need to consider the ability of the system to protect life and property at a catchment scale. While it is acknowledged that irrigation can cause salt build up in the soil profile if not well managed, it is dependent upon several factors including the water quality of the source and soil profile and drainage capability. The City of Bunbury has a salinity monitoring and water testing program that samples the area four times per year. Bore monitoring results are reported to DWER, and there has been no rising salinity recorded to date. Water usage on the playing fields has also been reduced and nearby bushland areas have been revegetated.

One submitter suggested that the Halifax drain should be piped and that this would then provide a physical separation between the industrial area and the park and reduce the availability of a water supply for kangaroos (which is also an issue below). Although the use of piped systems results in more efficient drainage systems that can affect downstream catchments both in relation to flooding and by transporting contaminants, open systems assist in slowing the flows and can provide water quality improvements. Therefore, piping is not considered a viable option, and the plan has not been amended as a result. Options that could be considered further include a weed management program and revegetation of the system (under the 'living waterways' program) to enhance water quality outcomes.

5.7 Native plants and vegetation

Several submissions suggested that the Swan Coastal Plain vegetation, threatened and priority ecological communities, threatened flora, significant flora and all other flora were not adequately described and protected within the plan. The plan has been amended to update information about vegetation complexes, Swan Coastal Plain Floristic Community Types (SCPFCTs) (including a new table showing SCPFCTs), Threatened Ecological Communities, plants and the Key Performance Indicator in line with the comments received. The 'Regionally significant species' listing has also been amended to replace individual species with a general description of other conservation significant species including range-end, disjunct and locally endemic species. Section 27 has also been amended to note that SCPFCT plots will have ongoing use for scientific studies and monitoring. The plan aims to protect all native plants and vegetation communities, particularly those that are threatened or restricted.

Some comments suggested that the numbers of plants described in the plan were inaccurate, and that the plan should state that there is no full inventory of plants. Plant numbers described in the plan are only an approximation given that there has been no full inventory of plants within the park, and figures

will date with time. However, the plan has been amended to revise figures in the plan based on botanical advice, including the addition of a note that there has been no full inventory of plant species within the park. The full surveying of plants/areas will take substantial resources and while this has been identified as a gap in knowledge about the park, it is likely that progressive steps will be taken over time to address this shortfall rather than being able to fund and commit to a full park inventory.

One submitter suggested that the management objective should be 'to conserve and maintain or improve the condition of all habitats and their plant communities and flora (native plants)' and this be reflected in a re-ordering and re-wording of the strategies because all the vegetation is regionally significant and the focus should not be on just the rare species and communities. The plan has not been amended in response to this point because the management objective aims "to conserve the habitat and populations of native plants". However, with limited resources priorities need to be established to address issues and values of most immediate need and there is a management focus on threatened species because of their more concerning conservation status.

One submitter suggested that the Key Performance Indicator target should be more ambitious: less than 1% decrease in the number of occurrences. The plan has not been amended as the measure relates to occurrences or populations and botanical advice considers this to be low enough to not be exceeded naturally or through inadvertent impact.

5.8 Native animals and habitats

One submitter suggested opportunities for creating ecological linkages on the west and north sides of Manea Park such as between Manea and Hay Park, Loughton and Tuart Brook. The plan was not amended in relation to this comment as (i) these suggested areas involve the difficulties of crossing highways, (ii) the plan is strategic in that it doesn't mention every potential ecological linkage in the text, and (iii) the inclusion of other lands into the park is dependent on several factors as described on page 6 of the plan, including being reserved for ROS in the GBRS and many of the lands referred to are currently zoned 'Urban' in the GBRS. However, the plan was amended to include an introductory paragraph for 'Habitats' highlighting the linked combination of vegetated landforms that support diverse habitats.

One submitter suggested that (i) recovery plans do not work without the support of the managers within government departments and the government of the time, (ii) that there needs to be a focus on managing habitat destruction rather than the translocation and rehabilitation of individual animals, and (iii) that there needs to be an additional strategy for a moratorium on clearing. The plan was not amended in relation to these comments as (i) recovery teams consist of a variety of experts and community representatives as well as managers and decisions/actions need to be a collective outcome, (ii) many recovery actions are subject to resourcing and they vary significantly in the resources required, likelihood of success, etc., (iii) although it is agreed that the protection of existing high-quality habitat may be the most important action, acquiring new lands can be the most resource-hungry, long-term, and difficult to achieve, and (iv) native vegetation clearing is regulated under specific legislation and regulations, and any clearing within the park will be subject to planning and impact assessment requirements.

5.9 Fire management

Two submitters suggested more mosaic and cool burning within the park to protect park values, particularly the western ringtail possum. The plan was not amended in response to this point because the plan and existing prescribed burning practices have already taken this into consideration including considering a range of values and factors during fire planning, such as existing threatened species within the area and the most appropriate season, frequency and intensity of burning to achieve outcomes for that patch. DBCA has existing specific fire planning advice for western ringtail possums and this is considered during the preparation of prescribed burns that may affect this species.

One submitter suggested that Noongar people be involved in the planning and implementation phases of a Fire Management Plan for the regional park, and that liaison with Noongar people for fire management is not addressed in the management strategies. The plan has not been amended as the current strategies in the plan reflect that fire management planning is led by DBCA and DFES, which have experience in bushfire and prescribed burning planning and management, and address consultation being undertaken in relation to fire management activities. In addition, DBCA's Parks and Wildlife Service overarching Fire Management Strategy includes incorporating cultural fire management, where practical, that is informed by traditional knowledge held by Aboriginal people to enhance ecosystem health and function.

One submitter suggested that as the park is located in areas of bush fire risk, a Bushfire Management Plan needs to be prepared to determine the specific level of bush fire risk and to demonstrate that this risk can be appropriately mitigated. The plan has not been amended as it promotes the full assessment and compliance with Western Australian Planning Commission planning instruments during park management and for any adjacent development or proposals, and already indicates further fire management guidance will be prepared.

5.10 Weeds and pest animals

An underlying theme from submissions that made comments about weeds and pest animals was the need to devote adequate resources to their management. Two submitters suggested that weed management to date has been ineffective, and needs (i) more resources, (ii) to be proactive rather than reactive, and (iii) engagement with the relevant Recognised Biosecurity Groups regarding planning and implementation. However, the plan was not amended as managing agencies, landowners and other groups only have limited resources, which need to be allocated using a prioritised approach. The plan already notes the crucial engagement with Recognised Biosecurity Groups as well as other organisations.

Several submitters suggested different approaches to weed management such as eradication, post-fire prioritisation and asset-based approaches. In response, although prioritisation needs to occur mainly because of limited resources, the plan was not amended as it includes flexibility for the application of different approaches depending on values, impacts, the invasiveness of species, feasibility and legislative responsibilities. The timing of weed and pest animal control is integrated with fire management programs, although sometimes there may not be alignment due to a range of factors such as resourcing and management issues.

Eight submitters mentioned specific weeds and/or pest animals that management needs to focus on, with one submitter suggesting the plan include a full list of weed species within the park. Another submitter suggested that the plan indicate that there is no full inventory of weeds. This strategic plan only intends to briefly describe some of the main species of concern and further subsidiary weed and pest animal planning and guidance may describe species in more detail. The plan was amended to revise the estimate of the number of weeds in the park and to note that there is no full inventory of weeds within the park.

Four submitters raised the control of kangaroos, with one submitter pointing out that kangaroos and weeds both played a role in impacting native vegetation. The issues raised were considered to not require amendment of the plan. The management of kangaroos is a matter that requires careful consideration as the Government has a responsibility to ensure the conservation of the State's fauna within the context of several management issues. Kangaroo numbers on the Swan Coastal Plain are known to naturally fluctuate from year to year. Any options considered for implementing kangaroo management measures within the park will need to consider a range of issues, including community and visitor safety, the ongoing effectiveness of measures, prioritisation of available resources and impacts on other native plants and animals. Options for culling kangaroos via shooting within the park will be unfeasible due to the proximity of adjacent urban areas and visitation levels.

One submitter raised the issue of consideration of impacts from spraying (adulticide) of mosquitos on bat populations in the area. There are many strategies for managing mosquitos including physical, biological, chemical and cultural methods. It is important to integrate a variety of management strategies into the management program to avoid the reliance on a single strategy, which will help to prevent many of the problems inherent with long-term control, such as the development of chemical resistance. Mosquitos are prey for a variety of animals including fish, birds and bats. Most species of microbats in Australia don't eat mosquitos, with many species only eating larger prey such as moths, beetles and spiders. Although some bat species can and do eat mosquitos, they don't eat them very often and when they do they don't eat many of them, instead preferring moths or beetles with only a small percentage being mosquitos. Larviciding is the preferred means of chemical control as it targets large populations per square metre and is target specific. Adulticiding is rarely used to control mosquitos and if used the area targeted is precise and not a broad area application. The plan was not amended in relation to this comment.

5.11 Rehabilitation

Two submitters suggested the focus should be on maintaining or improving the condition of existing vegetation or acquiring remnant vegetation rather than rehabilitation. Although the acquisition of conservation reserves or additions to the park is preferable to protect vegetation in situ, this is dependent on a range of factors including the land being zoned as ROS in the GBRS. Rehabilitation is therefore a relevant option for assisting in the overall enhancement of the park's biodiversity and natural environment. However, the plan has been amended regarding key principles when considering rehabilitation, including feasibility.

One submitter suggested adding another potential candidate for rehabilitation as road reserves that can be closed such as Ditchingham Place within Wardandi Flora Reserve. The plan was not amended as the list only highlights example areas and is not intended to be a full inventory of candidate sites. Closure of this specific road reserve is unlikely to be considered until ongoing infrastructure requirements in the area are further determined.

One submitter suggested that rehabilitation programs use a variety of other local native and endemic species rather than the same species. The submitter also questioned the use of glyphosate and Metsulfuron and how/when they are applied. Effective weed management uses a combination of mechanical, physical and chemical tools. There are circumstances where chemical control is the only effective and efficient option for managing the spread of invasive weeds. Weed control using chemicals, including glyphosate and Metsulfuron, is effective, cost efficient and safe when applied in accordance with label instructions. Agency staff are expected to be trained in best practice environmental area management to ensure such targeted control occurs at the most appropriate times to achieve the most productive outcome whilst minimising impacts on non-target species. Strategy 1 of Section 15 states that rehabilitation and restoration will be in accordance with best practice principles and standards, which includes species selection that reflects the rehabilitation targets and purpose for specific sites. Every effort is made to ensure diversity of species selected for revegetation as per the soil type and vegetation community, noting that in many cases, unique species cannot be replicated or propagated in a nursery environment. The plan was not amended in relation to these comments.

5.12 Noongar cultural heritage

One submitter suggested a plan be developed to increase Noongar participation from the decision-making level through to public education, management and conservation work. The plan has not been amended in relation to this comment as existing strategies in the plan include maintaining and building on cooperative management arrangements with Noongar people for the park, and reflect the different management agency consultation, policy and statutory frameworks that exist. Proposals for new

developments in the park will also be subject to consultation with Noongar people, consistent with legislation, policy and the South West Native Title Settlement.

5.13 Other cultural heritage

Two submitters suggested that there needs to be more reference to the history of establishment of the park, particularly the Preston River to Ocean part of the park and the vigorous and effective community campaigns to protect natural areas in the Park. Although the plan is a strategic plan and not intended to describe the full historic development of the park, the plan has been amended to include reference to the history of the development of the park (particularly the Preston River to Ocean part of the park), which is more fully described in the 'Purpose of the plan' section.

5.14 Visitor use and planning

This section of the plan attracted the most comments, with eight different submitters making 37 comments relating to dogs.

Dogs

Most of the comments about dogs were in relation to Clifton Community Reserve. Most of the comments suggested that the dogs off-leash areas be reduced in this reserve to make it safer for visitors to walk along the river and to reduce impacts on wildlife. The plan was amended to indicate that it is proposed to review dog exercise areas within Clifton Community Reserve in consultation with the community.

Many comments were closely associated with the application of the Dog Act within the park and the issue of poorly or un-supervised off-leash dogs by owners. Some comments questioned whether dogs are required to be on a leash at all times in public places under the Dog Act 1976. The plan has been amended to replace "on a leash" with "under control or supervised" in accordance with section 32(1) of the Dog Act, which also conforms with section 31 of the Dog Act. Although the Dog Act is the primary legislation for regulating the action of dogs and their owners/responsible persons in public places and is administered by local government, it is the owners' responsibility to comply with the Dog Act.

Several comments were concerned about dogs threatening people and wildlife, including waterbirds alongside and within waterways such as the Collie River and Leschenault Estuary. Although bordering waterways are not in the park, some wetlands and adjacent reserves will become conservation reserves managed by DBCA and dogs are proposed to be prohibited from several of these including Point Douro, Elbow/Eelup wetland and the Brunswick wetland/foreshore at Treendale. One submitter suggested that 'competence' and 'reasonable proximity' (in relation to Section 32(1e) of the Dog Act) need to be better defined. With both the Dog Act and Biodiversity Conservation Act (which provides protection of native flora and fauna) there are legal and resource limitations on enforcement such as the burden of proof. A more effective strategy, which was suggested by some submitters, is to provide information/education to the community about the responsible use and management of dogs. Although managing agencies will undertake education, management and compliance activities with available resources and consistent with legislation, the plan has been amended to provide further information about jurisdictions and responsibilities of managing agencies as well as to include a new strategy aimed at education about the responsible control of dogs on lands within the park.

Two submitters suggested that dogs off-leash areas be restricted to Recreation management zones. The plan was not amended in relation to this point as most existing designated off-leash dog exercise areas are located within the Recreation Management Zones identified on Maps 4a and 4b. While there are no current proposals for expansion of existing dog exercise areas, the management plan needs to provide adequate flexibility for new dog exercise areas to be established or existing exercise areas to be reviewed or relocated.

Some submitters also proposed other areas in the park such as Leicester and Watson reserves should be dog-free or on-leash. Land managers have responsibilities for managing their own lands within the

park, and some areas are proposed to be changed in the plan. The plan provides flexibility for future proposals to be considered in consultation with community. The plan generally was not amended in response to these area-specific comments, although it was qualified that Leicester Reserve will be prohibited dogs within the fenced possum sanctuary.

Other recreation use/issues

Two submitters suggested that there should be more connecting walk/cycle pathways around the park including the Collie, Brunswick and Preston rivers and from Preston River to the ocean. A network of trails through the park is a concept that is supported by the plan. Recreation planning for/within the park will consider existing strategies and facilities located within and surrounding the park as well as physical and social constraints and other factors to ensure a variety of sustainable recreation opportunities are offered (subject to resources and stakeholder consultation). There were questions about a range of other recreational activities such as mountain biking (in the Maidens), drones, cross-country running/orienteering and horseriding. The plan was not amended in relation to comments about these other uses as recreational activities are dependent on the land tenure, the land manager or agency and their policies, funding and potential conflict with other values or users and any specific proposals put forward within an area will be fully assessed and considered against the suite of other values before any decisions are made.

Some comments suggested that there should be no use of the park that impacts on natural values in line with the chief purpose of the park to protect natural values and that some recreation activities should be excluded or zones changed. The plan was not amended in relation to these comments as one of the purposes is to "...provide for... recreation..." and allow "...an appropriate level of use by the community", and all visitor activities involve degrees or levels of disturbance and appropriate management aims to minimise impacts and ensure a range of uses appropriate to specific areas. Many areas of the park have established levels of visitor use and modification and the protection/enhancement of areas with conservation values is not necessarily incompatible with facilitating managed public use and education.

Two comments were made about cats in relation to passing laws to stop cats leaving houses and involving Friends groups in cat control. The plan was not amended in relation to these comments as changes to legislation is beyond the scope of the management plan and the management of cats has several sensitivities that are best managed by landowners or agencies.

5.15 Visitor information, interpretation and education

One submitter suggested that this section include reference to the Parks and Wildlife 'Nearer to Nature' program, and the plan has been amended to include reference to this program.

One submitter suggested the addition of 'community bushland education activities'. While this is a strategic plan and the full range of community education and nature appreciation activities is not described in the plan, 'community bushland education activities' has been added to this section.

5.16 Park access and accessibility

Three comments suggested that access be maintained or increased within the park in relation to universal access, pathways around the Brunswick and Collie Rivers and for fishing. Seven comments suggested that access be limited or denied for vehicles to areas such as beaches, The Junction/Twin Rivers and the Estuary foreshore, and for dogs to areas such as Point Douro and Clifton Park foreshore. The plan wasn't amended in relation to any of these comments as access will be considered during any specific recreation plans that are developed for sites around the park and the plan provides the opportunity to review current access if there is environmental harm occurring. There needs to be flexibility to review access in the future (subject to appropriate assessment and community consultation), while ensuring the protection of values and equitable access opportunities through the park for communities.

5.17 Commercial opportunities

On submitter suggested greater directional clarity on the types of commercial activity that may be considered acceptable within the park. The plan was not amended because commercial operation proposals would be assessed and considered on a case-by-case basis by relevant management agencies, consistent with strategy 1, and the absence of defined acceptable or unacceptable operations provides greater flexibility for considering commercial operation proposals during the life of the plan based on knowledge of values and park use at that time.

One submitter suggested that guided horse tours are a possibility. Guided horse tours may be considered for different parts of the park subject to the relevant land manager's approval. These can potentially increase commercial opportunities and increase visitors' appreciation of the park and its natural and cultural values. However, this will not be appropriate for all or specific areas of the park given the very important and sensitive values at certain sites throughout the park, including within existing and proposed conservation reserves.

5.18 Working with the community

One submitter suggested that relevant Catchment Councils such as Leschenault Catchment Council (LCC) and South West Catchment Council (SWCC) should be included as key stakeholders in this section. The plan was amended to include these organisations in the text of this section.

Two submitters suggested that Friends groups should be established for all sections of the park and that all Friends groups should be represented on the regional park Community Advisory Committee. The plan was not amended because although the plan recognises the important role of the community in the ongoing management of the park, the establishment of Friends groups is best led by the community with support from the agencies. Community representatives on community advisory committees are chosen as individuals and not appointed to represent specific community interest groups or associations, and committees need to be kept to a workable size.

One submitter suggested that an additional management strategy should be included that engages surrounding residents who are not already actively involved in existing community groups to take ownership of the regional park and take small actions at home to protect the values of the park. The plan was not amended as the plan is a strategic plan and the full range of tools for engaging or informing the community is not described in the plan and may change over time.

5.19 Plan implementation

Several comments suggested that for the plan to effectively manage and protect conservation areas adequate funding is required, which should be pre-empted in the plan. The plan was not amended in relation to this comment as funding is not addressed in this plan and for many agencies funding is provided annually through budget allocations, which each agency manages to achieve limited priorities. The plan contains sufficient guidance to provide direction for prioritising management and protection of the park.

One submitter suggested that a program be developed to investigate natural values in need of further information. The plan has been amended to include a statement about the need to investigate values, issues and areas within the park to improve overall knowledge about the park.

5.20 References

One submitter requested that his work be referenced within the plan. Although the reference list is not a bibliography (which is a list of all the sources that have been used whether or not they are referenced in the plan) and references cited are only those referred to in the text, the plan has been amended to include additional references as suggested in the appropriate locations of the plan.

5.21 Appendices

Three comments were received relating to Appendix 2 - *Schedule of land for inclusion in the regional park*. Two of the comments suggested that the land tenure proposals should be “as per the original draft Management Plan”, which the submitter suggested was changed for the plan that was released. The draft plan was not amended in relation to these comments as the draft plan that was released for public comment on 13 August 2020 was the 'official' plan that had been approved by the relevant management agencies. Any previous versions were draft iterations of the plan still subject to further consultation with individual land managers.

The third comment suggested that further community consultation needs to occur with residents of Clifton Park (Australind) over the change in vesting of some areas of Clifton Park to the Conservation and Parks Commission. The plan was not amended in relation to this comment as land tenure changes are an outcome of negotiation between land management agencies.

6. SUMMARY

While the total number of submissions to the draft management plan was not high, there were considerable comments about issues of interest to submitters. There was also a balanced representation between key stakeholder groups (i.e. local government, state government, peak bodies and private individuals).

Key areas of interest by submitters included dogs, natural values, vegetation, landforms, water issues, working with the community, weeds and pest animals, land tenure and the establishment history of the park. Generally, the draft plan was well supported, and the most significant concerns that were within the scope of the plan were addressed with further clarification in the final plan.

7. REFERENCES

Bischoff, B. (2013) Vegetation as a mapping tool on the Swan Coastal Plain. *Bushland News*, **88**: 4.

Appendix 1. Submitters to the *Kalgulup Regional Park draft management plan 2020*

State Government

Department of Communities
Department of Fire and Emergency Services
Department of Water and Environmental Regulation
Department of Jobs, Tourism, Science and Innovation
Tourism Western Australia
Minister for Tourism
Minister for Water
Department of Environment and Water (South Australia)
Department of Primary Industries, Parks, Water and Environment (Tasmania)

Local Government

Shire of Capel
Shire of Dardanup

Non-government organisations/community groups

National Trust WA
Wildflower Society of WA
Busselton Naturalists Club
Friends of Barnes Avenue Bushland
Western Australian Horse Council
Conservation Council Citizen Science

Individuals

J. Alford
R. Alman
J. Anderson
R. Anderson
B. Bischoff
H. Blom
B. Buchanan
F. Cooper
P. Eckersley
J. Ferguson
R. Gem
E. Hammond
L. Hammond
R. Gates
J. Kikeros
R. Quinn
J. Sherwood
A. Stubber
J. Vaughan
K. Zeelandelaar-Adams