

# Leschenault Peninsula

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## Analysis of Public Submissions

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MANAGEMENT PLAN N0 38



Department of Conservation  
and Land Management



National Parks and Nature  
Conservation Authority

# **LESCHENAULT PENINSULA**

## **ANALYSIS OF PUBLIC SUBMISSIONS**

**TO THE DRAFT MANAGEMENT PLAN**

Department of Conservation and Land Management  
for the  
National Parks and Nature Conservation Authority  
Perth, Western Australia 1998

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## INTRODUCTION

This document is an analysis of public submissions to the draft management plan for Leschenault Peninsula.

The plan was released for public comment on 21 June 1996 for a period of two months. Late submissions were accepted. A total of 57 submissions was received. All submissions have been summarised and changes have been made to the plan where appropriate.

Following the release of the plan, advertisements were placed in local and Statewide newspapers advising that the draft management plan was available for comment. The draft plan was distributed to State Government departments, tertiary institutions, recreation and conservation groups, local authorities, libraries and numerous individuals who expressed interest during the preparation of the draft. Copies of the plan were available for perusal at the Department of Conservation and Land Management (CALM) and local government offices. The plan was available for purchase from the Department's State Operations Headquarters and its local District Office.

## ANALYSIS OF PUBLIC SUBMISSIONS

### Method of Analysis

The public submissions on the draft management plan were analysed according to the process depicted in the flow chart over the page. More specifically:

- All points were collated according to the section of the draft plan they addressed.
- Each point was assessed using the following criteria:
  1. The draft management plan **was amended** if the submission:
    - (a) provided additional resource 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 goals and objectives;  
or
    - (e) indicated omissions, inaccuracies or a lack of clarity.
  2. The draft management plan **was not amended** if the submission:
    - (a) clearly supported the draft proposals;
    - (b) offered a neutral statement, or no change was sought;
    - (c) addressed issues beyond the scope of the plan;
    - (d) made points that were already in the plan, or had been considered during its preparation;
    - (e) was one amongst several widely divergent viewpoints received on the topic and the recommendation of the draft plan was still considered the best option;
    - (f) contributed options that were not possible (generally due to some aspect of existing legislation, Government or departmental policy).

- The reasons why recommendations in the draft plan were or were not, changed and the relevant criteria used, were discussed with each comment. Minor editorial changes referred to in the submissions have also been made.

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 would give cause to elevate the importance of any submission above another.

### Number and Origin of Submissions

The number and place of origin of submissions are listed below.

	Number	Percentage
Individuals	42*	74
Community Organisations	8*	14
Government: State	6	10
Local	<u>1</u>	<u>2</u>
<b>TOTAL</b>	<b>57</b>	<b>100</b>

\* Thirty of the 42 submissions from individuals and 2 of the 8 from community organisations were form letters (see Appendix 1).

A list of the submitters to the Leschenault Peninsula Draft Management Plan is given in Appendix 1.

### ANALYSIS TABLE

The analysis table contains:

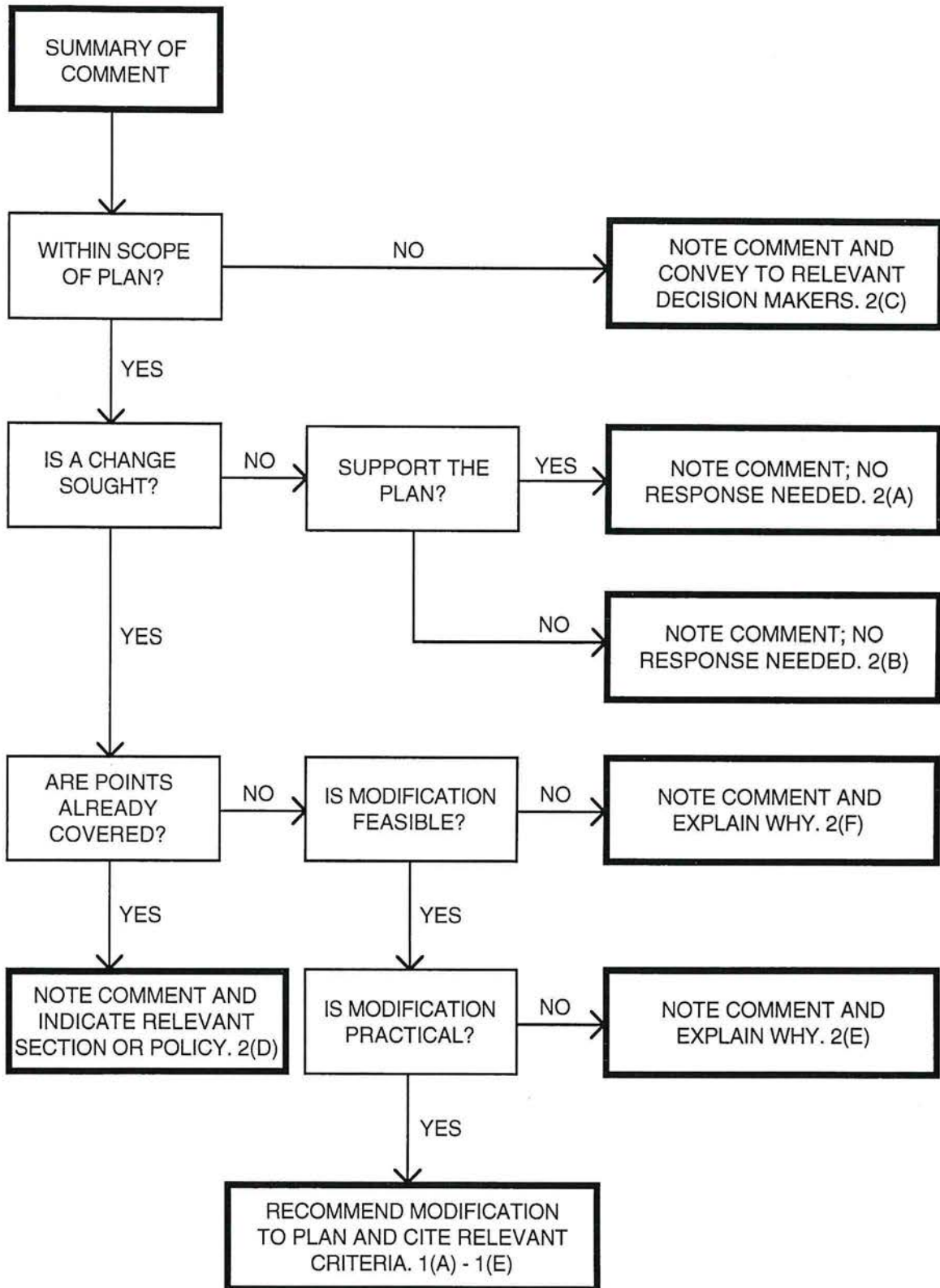
- a summary of each comment made; and
- a discussion on why the comment did not result in an amendment to the final plan, or an indication of what action was taken in the final plan.

It also indicates:

- the number of different comments made about each section of the draft plan;
- the number of submissions making each comment;
- whether or not the comment resulted in an amendment to the final plan; and
- the criteria by which each comment was assessed.



## ANALYSIS PROCESS



SUBMISSION COMMENTS	(No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<b>GENERAL</b>			
<i>5 submissions.</i>			
1. Congratulations on the release of this plan. We fully support the recommendations.	(2)	Support for the plan.	No 2(a)
2. The plan is comprehensive and incorporates all the relevant issues.	(1)	Support for the plan.	No 2(a)
3. The Waterways Commission is now the Water and Rivers Commission. Clarification should be made regarding which section of the former Water Authority of WA is being referred to, i.e. the Water Corporation or the Water and Rivers Commission.	(2)		Yes 1(e)
4. The Leschenault Inlet Management Authority (LIMA) is now part of the Water and Rivers Commission.	(1)	Plan amended.	Yes 1(e)
5. Page ix, Summary: Public Access, indicates that previously inaccessible areas of Leschenault Peninsula will be open to the public. Some areas of previous effluent ponds, which have been allowed to dry out and then be covered by dunal systems, may not be stable enough to withstand vehicle access. This needs to be taken into account when establishing access.	(1)	This matter is now included in the text and recommendations of Section 23: Public Access.	Yes 1(a)
<b>SUMMARY</b>			
<i>1 submission.</i>			
1. References to recreation development need to acknowledge the extent of development that has now taken place since the draft plan was completed, particularly at Belvidere, which is no longer partially, but substantially developed.	(1)	Text amended.	Yes 1(e)
<b>INTRODUCTION</b>			
<b>1. LOCATION</b>			
<i>No submissions.</i>			
<b>2. VALUES</b>			
<i>4 submissions.</i>			
1. The term 'geophysical' is used instead of 'geomorphology'.	(1)	Text amended.	Yes 1(e)
2. It should be added that a species of plant in the family Brassicaceae ( <i>Rorippa</i> sp.), known only from the Leschenault Peninsula, has recently been recorded in the Park.	(1)	Added to text. This species is now also known from Yalgorup National Park.	Yes 1(e)
3. The plant <i>Carex pumila</i> , recorded on the Leschenault Peninsula, is not known from anywhere else in W.A. Further values of the Peninsula's vegetation include its extensive samphire marshes and its Quindalup Dune vegetation in excellent condition.	(1)	Added to text. Mention of the plant species added to Flora section as well.	Yes 1(e)



SUBMISSION COMMENTS (No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>4. The Peninsula contains one of the best populations in southwestern Australia of native pellitory (<i>Parietaria debilis</i>) and is thus a significant breeding area for the Australian admiral butterfly (<i>Vanessa itea</i>). (1)</p>	<p>Additions made to Introduction and Flora and Fauna sections.</p>	<p>Yes 1(e)</p>
<p><b>PRINCIPAL MANAGEMENT DIRECTIONS</b></p>		
<p><b>3. GOALS</b> No submissions.</p>		
<p><b>4. PURPOSE, VESTING AND TENURE</b> 4 submissions.</p>		
<p>1. The Leschenault Inlet Management Authority management area includes the eastern foreshore of the Leschenault Peninsula. We believe that some mention and indication of this should be made in the plan. (1)</p>	<p>Mention now included in text.</p>	<p>Yes 1(c)</p>
<p>2. The Report of the Marine Parks and Reserves Selection Working Group - 'A Representative Marine Reserve System for WA' recommends the area in the Leschenault Estuary north of Waterloo Head be reserved as marine nature reserve. Reference to this recommendation should be included in the plan. (1)</p>	<p>The Report is referred to in Section 4 of the Plan ('Purpose, Vesting and Tenure'). Text expanded to spell out the areas of the Estuary proposed as a marine nature reserve.</p>	<p>Yes 1(c,e)</p>
<p>3. Recommendation 1 does not indicate who will manage the fee-simple land. The management of the land must not sterilise existing mineral rights.(1)</p>	<p>It is clearly implied in the recommendation that CALM will manage the fee-simple land. The text states that CALM is already managing this land, under authority delegated by the Minister for Lands.</p>	<p>No 2(d)</p>
<p>4. Because of the fee-simple land and caveats relating to mineral rights, almost half the area is managed under delegated authority. This authority is ambiguous, and needs to be clarified. It also needs strengthening to provide the appropriate degree of management and regulation. (1)</p>	<p>The plan recommends the pursuit of a solution that will allow the fee-simple land to be reserved as a conservation park.</p>	<p>No 2(d)</p>
<p><b>5. PARK ZONING</b> 5 submissions.</p>		
<p>1. There are prescriptions in the plan that envisage the closure of roads, tracks and access to parts of the Leschenault Peninsula. The intended effect of the two principal management zones, insofar as access applies, cannot be legally binding unless they are made classified areas under section 62 of the CALM Act and there are regulations in place that are applicable to the classification made. The final plan therefore should:</p> <ul style="list-style-type: none"> <li>• state that the principal management zones will be established as classified areas under section 62 of the CALM Act;</li> </ul>	<p>Comment appreciated. It may, however, be possible to achieve the results desired by management means, rather than by the use of section 62 of the CALM Act. Or other legislation could be used, such as the Off-Road Vehicles Act.</p>	<p>No 2(c)</p>

<i>SUBMISSION COMMENTS</i> (No. of Submissions)	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
<ul style="list-style-type: none"> <li>• provide that the two principal management zones may be amended or added to during the life of the plan if necessary to meet the objectives of the plan;</li> <li>• provide that where access is closed, the area, road or track closed may be established as a classified area (management sub-zone). (1)</li> </ul>		
<p>2. Table 1: Park zoning: criteria guiding management zones at Leschenault Peninsula. The table should be amended under 'Facilities' and 'Max. level of development' under the Recreation Zone to include 'overnight facilities such as cabins or chalets'. (1)</p>	<p>For the reasons given in Section 19, cabins and chalets may be premature during the ten-year term of this plan. However, the plan does not rule out the possibility of such developments: Section 19 states that they may be appropriate in the future.</p>	<p>No 2(d)</p>
<p>3. Figure 3 shows 3 former effluent-disposal lagoons proposed for development as recreation sites after 2005. Although there may not be any technical or safety reason to prevent such use of such sites, park users may see this as inappropriate. The sites all fall within a landform of nested parabolic dunes, which has a low to very low capability for recreation. (1)</p>	<p>Comment noted. This is only a proposal to develop sites after 2005, and will be considered when the time comes.</p>	<p>No 2(d)</p>
<p>4. The Park's ability to withstand 3 additional recreation sites is questionable. (1)</p>	<p>Comment noted. See above.</p>	<p>No 2(d)</p>
<p>5. The hand amendment to Figure 3 detracts from the professional presentation of the maps. (1)</p>	<p>Rectified.</p>	<p>Yes 1(e)</p>
<p><b>MANAGEMENT FOR CONSERVATION: THE PHYSICAL RESOURCES</b></p>		
<p><b>6. CLIMATE AND COASTAL PROCESS</b></p>		
<p><i>2 submissions.</i></p>		
<p>1. It is argued that wind erosion of unvegetated sand could require stabilisation. Such an action, if not initiated by human interference, is a natural response to environmental conditions and the peninsula owes much of its shape to this process. The need to stabilise should be examined to determine if the process is natural or artificially exacerbated. (1)</p>	<p>The effects of natural conditions in creating erosion are to be monitored (Recommendation 1). Rehabilitation as a result of storms will not be undertaken automatically, but only where appropriate (Recommendation 3).</p>	<p>No 2(d)</p>
<p>2. The point is made that a rise in sea water levels could affect the estuary and peninsula. The level of change predicted by specialists has been decreasing during the past decade. Future management of the peninsula should bear these changes in predictions in mind. (1)</p>	<p>Noted. The plan acknowledges that the effects of the Greenhouse Effect (including a possible rise in the water-table) are unclear.</p>	<p>No 2(d)</p>
<p><b>7. GEOLOGY, LANDFORMS AND SOILS</b></p>		
<p><i>3 submissions.</i></p>		

SUBMISSION COMMENTS	(No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
1. Under the International code for Stratigraphic Nomenclature, formation names are formalised in a refereed publication. There is an inconsistency in the use of the formal v. informal terms in this section, e.g. Safety Bay Sands is a formal term and therefore Sands should start with a capital, Leschenault formation is informal and should retain lower case 'f' in formation.	(1)	Text amended.	Yes 1(e)
2. Under the heading 'Sand Plains' the age is referred to as Holocene but the term 'Holocene origin' is used. The terminology should be amended.	(1)	Text amended to refer to the formation of the sand plains 'during the Holocene period'.	Yes
3. Recommendation 1 is supported. The Geological Survey of WA should be approached to supply the necessary expertise.	(1)	Noted. Support for the plan.	No 2(a)
<b>8. HYDROLOGY</b>			
<i>6 submissions.</i>			
1. It is recommended that CALM undertake the existing groundwater monitoring program in consultation with the Water and Rivers Commission and that data be provided to the Commission.	(1)	Text amended to reflect the current situation.	Yes 1(c)
2. Staining of the ocean is attributed to precipitation of ferrous sulphate. Description of the process should be amended to 'iron as ferrous sulphate reacts rapidly and precipitates as a range of chemical species, including iron sulphates, oxides, hydroxides and carbonates, and acid in the solutions would liberate carbon dioxide from the calcareous sands'.	(1)	Text amended.	Yes 1(e)
3. Under 'issues' it is stated that restrictions may be placed on the use of groundwater for several reasons. The quantity needed for the very low development levels as warranted in a conservation area would make very little difference to the storage present.	(1)	Noted.	No 2(d)
4. The references to the Water Authority need to be updated.	(1)	Recommendation 2 to be amended to refer to the Water and Rivers Commission.	Yes 1(e)
5. The nature and extent of the program to monitor groundwater is ambiguous. How many bores are monitored, for what purpose (i.e. acidity only) and how frequently? What levels are acceptable? How are the results from monitoring reported and to whom?	(1)	Text amended. Since the bores are now monitored by the Water Corporation, the recommendation referring to monitoring by CALM have been deleted.	Yes 1(e)



SUBMISSION COMMENTS (No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>6. There is a cross reference to sections 11 &amp; 18 re excavated freshwater points, but there is no specific reference to them in either of those sections. It is unclear whether they are to be assessed for historical or biological significance, and whether they are to be left or filled in. We suggest that section 8 recommend these sites be assessed for their historic significance, and sections 11 &amp; 18 be amended to include comments on them. (1)</p>	<p>Amendments made to sections 11 &amp; 18, to refer to any historical or biological significance of the excavated freshwater points. Recommendation added to section 8.</p>	<p>Yes 1(a)</p>
<p><b>9. LANDSCAPE</b> No submissions.</p>		
<p><b>MANAGEMENT FOR CONSERVATION: THE BIOLOGICAL RESOURCES</b></p>		
<p><b>10. FLORA AND VEGETATION</b> 9 submissions.</p>		
<p>1. The white mangrove (<i>Avicennia marina</i>) does not occur in Koombana Bay. It is likely that the stand to which the report refers is the one located in the Leschenault Inlet. (1)</p>	<p>Text clarified to refer to the population of white mangrove in Leschenault Inlet, near Koombana Bay.</p>	<p>Yes 1(e)</p>
<p>2. Concern is held over the health and status of the Mangrove community in the Leschenault Inlet. As the Mangroves are the southernmost stand on the west coast it is suggested that the proposed research program on the status of the Mangrove Closed Scrub Community should include the Mangrove community in the Leschenault Inlet. (1)</p>	<p>Dr Luke Pen, Water &amp; Rivers Commission, who has studied the mangrove population, suggests investigating the possibility of using seed from the Leschenault Inlet population to try to establish further populations in the Leschenault Estuary. Plan amended to incorporate this idea.</p>	<p>Yes 1(a)</p>
<p>3. Figure 6 Vegetation: <i>Agonis flexuosa</i> is noted with 'damage' caused by erosion. If the erosion was naturally initiated, then the effect was the result of a natural process. It is recommended that 'damage' be replaced by 'impact'. (1)</p>	<p>Key amended to '<i>Agonis flexuosa</i> affected by erosion or deposition of sand'.</p>	<p>Yes 1(e)</p>
<p>4. Recommendation 8 is to stabilise the blowout north of Waterloo Head. If the blowout is natural, then to stabilise would be to interfere with natural processes. (1)</p>	<p>Recognised. However, the need to protect the stand of Mangrove Closed Scrub from inundation is of over-riding importance.</p>	<p>No 2(f)</p>
<p>5. Need to update the information on plant species. The reference to Trudgen (1984) in Section 2 (Values) and this section notes that 41 of the Peninsula's 122 species are not known from the nearest national park (Yalgorup). This is unlikely still to be accurate. The figures and other references from Trudgen should be reviewed; for example, <i>Banksia attenuata</i> and <i>Xanthorrhoea</i> sp. are known to occur in the Park but are not recorded by Trudgen. (1)</p>	<p>Information on flora updated.</p>	<p>Yes 1(a)</p>

SUBMISSION COMMENTS (No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
6. The plan should acknowledge the presence of a previously unrecorded species of Brassicaceae ( <i>Rorippa</i> sp.) recently recorded from the Park, and known only from Leschenault Peninsula. (1)	Plan amended to include reference to <i>Rorippa</i> sp. The species is now also known from Yalgorup National Park.	Yes 1(a)
7. The first paragraph under the subsection 'Issues' (p. 14) reads awkwardly [suggested rewording given].	Paragraph reworded.	Yes 1(e)
8. Suggest including a reference to the next southernmost occurrence of <i>Avicennia marina</i> in W. A., being the Abrolhos Islands, over 500 km to the north. (1)	Reference included.	Yes 1(a)
9. The lack of regrowth of tuart and hakea referred to may also be partly due to grazing by kangaroos; this effect should be assessed. (1)	The need to assess the effect of grazing by kangaroos included in the text and recommendations.	Yes 1(a)
<b>11. FAUNA AND FISHERIES</b> 2 submissions.		
1. Kangaroo numbers on the peninsula need to be controlled. (1)	Already discussed and recommended, in Section 11.	No 2(d)
2. The section on mammals should be updated to acknowledge the dramatic increase in the numbers of common brushtail possums since fox control began, the successful re-introduction of the western ringtail possum, and the translocation of the southern brown bandicoot. (1)	Mention included in text.	Yes 1(a)
<b>MANAGEMENT FOR CONSERVATION: PROTECTION</b>		
<b>12. INTRODUCED PLANTS</b> 2 submissions.		
1. Encourage couch grass and discourage 'garlic weed' ( <i>Trachyandra</i> sp.) at recreation sites. The plan mentions 6 of the 42 introduced plant species; there is no mention of 'garlic weed' despite its prevalence. (1)	<i>Trachyandra divaricata</i> is well known to CALM as a weed. The 6 species mentioned are those that are declared as noxious weeds.	No 2(d)
2. The plan makes reference to olive trees being of 'historical significance' because of the plantings at Belvidere. However, there should be immediate action to halt the further spread of this species, which now occurs from the northern entry to within 2 km of the southern end of the Park. (1)	Reference made in text to the spread of olive trees and the need to remove those specimens that are not part of the original plantings.	Yes 1(a)
<b>13. INTRODUCED ANIMALS</b> 1 submission.		
1. Recreation facilities are spoilt by rabbits. CALM must control rabbits on the peninsula with 1080 or the calici virus. (1)	See Section 13, Recommendation 1: a program to control introduced animals has begun and will be continued.	No 2(d)

SUBMISSION COMMENTS (No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p><b>14. FIRE</b> <i>1 submission.</i></p> <p>1. As a neighbour, and in an effort to avoid stock wandering from the property, and to maintain proper firebreaks, support is sought for an extension of our southern fence to the beach. (1)</p>	<p>This will be discussed with the person concerned. However, it should be noted that it is the landowner's responsibility to contain stock within private property.</p>	<p>No 2(f)</p>
<p><b>15. DISEASE</b> <i>1 submission.</i></p> <p>1. The reference to banksias not being present is incorrect. <i>Banksia attenuata</i> occurs as isolated trees towards the Park's northern end. (1)</p>	<p>Text amended.</p>	<p>Yes 1(a)</p>
<p><b>16. REHABILITATION</b> <i>9 submissions.</i></p> <p>1. The impact of waste-dumping in the past is underemphasised. The period in which waste was piped beyond the continental shelf does not get adequate mention. (1)</p> <p>2. Current disposal of chloride waste needs to be expanded. (1)</p> <p>3. The concerns over dune stabilisation are noted. Is there to be a uniform policy over attitudes to 'normal' erosion particularly in relation to natural blowouts? (1)</p> <p>4. The point about allowing natural erosion of the sand to continue is supported. (1)</p> <p>5. Proposals to stabilise with marram grass are noted. Will there be anything else used? (1)</p> <p>6. Under 'Industrial use' the term, 'sulphate pigment' is used. The pigment produced is mostly an oxide and not a sulphate. The correct usage is 'sulphate process'. (1)</p> <p>7. 'Ferrous sulphate' is described as being precipitated. This is not correct. (1)</p> <p>8. Figure 7, Areas of Effluent: Areas are shown as having broad, open vertical lines (near the north and east of Belvidere Beach) but are not shown on the legend. (1)</p> <p>9. Management Goal: The comment about retaining the natural processes of erosion and stabilisation are supported. (1)</p>	<p>Comment appreciated. The history of waste disposal is covered in fair detail in the plan, whose chief purpose is how the Peninsula will be managed in the future.</p> <p>Beyond scope of plan.</p> <p>There is a policy, stated in the second objective and recommendation 3 of Section 16: Rehabilitation. This is to allow the natural processes of erosion and stabilisation to continue as far as possible while meeting other management objectives.</p> <p>Support for the plan.</p> <p>Recommendations 9,10 &amp; 13 refer to the use of local species of plant in revegetation.</p> <p>Text amended.</p> <p>Text amended.</p> <p>Figure amended.</p> <p>Support for the plan.</p>	<p>No 2(d)</p> <p>No 2(c)</p> <p>No 2(b)</p> <p>No 2(a)</p> <p>No 2(d)</p> <p>Yes 1(e)</p> <p>Yes 1(e)</p> <p>Yes 1(e)</p> <p>No 2(a)</p>



SUBMISSION COMMENTS (No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p><b>MANAGEMENT FOR CONSERVATION: THE CULTURAL RESOURCES</b></p> <p><b>17. ABORIGINAL SITES</b> <i>No submissions.</i></p> <p><b>18. COLONIAL HISTORY</b> <i>1 submission.</i></p> <p>1. There needs to be immediate action to protect some of the features and artefacts at Belvidere that relate to the alternative-lifestyle era, including the shower tree, the conspicuously large tuart tree and the remains of some of the former residences. (1)</p>	<p>Noted: information passed on to land managers. Recommendation 3, about assessing and documenting the evidence of past land-use, broadened to include investigate ways to protect features and artefacts of historic value.</p>	<p>Yes 1(a)</p>
<p><b>MANAGEMENT FOR VISITOR USE</b></p> <p><b>19. GENERAL RECREATION PHILOSOPHY</b> <i>2 submissions.</i></p> <p>1. Any proposal for development on the Estuary foreshore should be referred to LIMA for consideration and comment in relation to the potential for effects on fringing vegetation, estuary-bank stabilisation and possible increases in nutrient import to the estuary. (1)</p> <p>2. Why preclude cabins/chalets or constructed accommodation (other than camping) for the next ten years? The second paragraph on page 38 should be amended by deleting points (i) to (iii). The last sentence of paragraph 3 amended to read "Therefore, subject to successful rehabilitation, plant establishment and detailed site design and planning, these areas may be appropriate for camping". (1)</p>	<p>Plan amended to include reference to LIMA's responsibilities.</p> <p>Suggested sentence added to text, but points (i)-(iii) left in place.</p>	<p>Yes 1(c)</p> <p>Yes 1(e)</p>
<p><b>20. RECREATIONAL SITES AND FACILITIES</b> <i>2 submissions.</i></p> <p>1. The plan proposes extensive public recreation areas and therefore raises queries as to whether there are enough resources to manage it all. (1)</p> <p>2. Strongly support recommendation 3, advocating an increased management presence. The absence of rangers and managers in the past has resulted in the degradation of facilities. (1)</p>	<p>Development for recreation will occur in stages, to match demand and resources to manage the area.</p> <p>Agreed. Support for the plan.</p>	<p>No 2(b)</p> <p>No 2(a)</p>
<p><b>21. DAY USE AND BUSH WALKS</b> <i>3 submissions.</i></p> <p>1. Section needs to be updated to acknowledge extensive development at Belvidere Beach and Tuart Grove. (1)</p>	<p>Plan updated.</p>	<p>Yes 1(e)</p>

<i>SUBMISSION COMMENTS</i> (No. of Submissions)	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
2. Figures 8 & 9 are out of sequence. (1)	Rectified.	Yes 1(e)
3. Figure 8 proposes two games fields, in conflict with Section 19 and CALM policy, and apparently inconsistent with Section 56 (1)(c) of the CALM Act. This will duplicate facilities outside and in the immediate vicinity of the Park, and does not enhance understanding of the natural environment.(1)	Figure 8 is only a concept plan (its title has now been amended to include those words). Games fields have not been developed, but it would be appropriate to have the option of doing so in the future, if a clear need were demonstrated. Developing games fields in areas already cleared or highly disturbed would not conflict with section 19 of the Management Plan or the CALM Act.	No 2(d)
<b>22. CAMPING, CAMPFIRES AND GROUP ACTIVITIES</b>		
<i>4 submissions.</i>		
1. Paragraph 2 needs amendment as it is out of date. It should be replaced with: 'Camping facilities have recently been opened at Belvidere. Ten sites are available, with 2 being suitable for small groups. The campsite is accessible by car'. (1)	Text amended.	Yes 1(e)
2. Vandalism is occurring at campsites, and the depreciative behaviour (mainly at night) of some visitors is spoiling the experience for others. A new recommendation should be included along the following lines: <ul style="list-style-type: none"> <li>• Ensure adequate Ranger presence during the evening. Continue to liaise with local Police, Shire and community in an effort to alleviate unwelcome behaviour. If other means to curb the depreciative behaviour and vandalism prove ineffective, introduce day use only to all sections of the Park except The Cut (this option will only be adopted after consultation, and with the agreement of the advisory committee). (1)</li> </ul>	Reference to vandalism is already made in Section 26. Reference is now included also in the text and recommendations in Section 20.	Yes 1(b)
3. The descriptions of the Cut and Belvidere need to be updated to acknowledge the extent of development. (1)	Plan updated.	Yes 1(a)
4. Recommendation 5 requires CALM's written approval for competitive activities [for groups of 15 or more]. We suggest the Community Advisory Committee should be involved in decisions to allow such activities. (1)	Noted. The decisions can be made by CALM.	No 2(d)
<b>23. PUBLIC ACCESS</b>		
<i>14 submissions.</i>		
1. 4WD access is too restrictive. Access should be allowed to the whole beach (from the cut to Buffalo Road carpark) from the water line to a point prior to the beginning of sandhills or vegetation. (32)	Licensed 4WD vehicles will be allowed access to the beach zone along the western side of the peninsula, except for Buffalo and Belvidere Beaches (Fig. 13), which will be for pedestrians only.	Yes 1(b)

SUBMISSION COMMENTS	(No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
		<p>Access will be confined to the beach zone: the dunes will be excluded. Recommendations in Section 23 (Public Access) amended accordingly. As a result of allowing access to the Peninsula both by road and along the beach, it will be difficult to collect access fees. It is intended for the immediate future that there should be no fee for access into the Park, only fees for camping.</p>	
<p>2. The plan should be amended to include a clause for access to the beach by amateur fishers, e.g. 'In the case of amateur fishing, arrangements for the use of unlicensed off-road vehicles will be subject to permits with specified conditions, including areas of use and for a period of 12 months'.</p>	(2)	<p>Plan amended as above, to allow greater access to the beach for licensed 4WD vehicles. However, unlicensed off-road vehicles will not be allowed.</p>	<p>Yes 1(b)</p>
<p>3. Restricting 4WD access along the beach would disadvantage the commercial beach seine fishermen and should be reconsidered. One option would be to allow access under a Code of Conduct.</p>	(1)	<p>Plan amended as above, to allow greater access to the beach. CALM will liaise with the groups concerned in order to establish a code of conduct.</p>	<p>Yes 1(b)</p>
<p>4. We strongly disagree with recommendations 7, 8, and 11 concerning access. The closure of the beach will lead to a number of problems: policing of permits will take up CALM officers' time; conflict between permit holders and non-holders; increased activity in 'open' beaches to the north, leading to conflict between users. This area is not accessible to fishers without access to and movement along the beach.</p>	(1)	<p>Plan amended as above.</p>	<p>Yes 1(b)</p>
<p>5. Recommendation 12 prohibits the taking of worms on the Estuary interface. This is designed so as not to disturb sediments. This sediment disturbance is minimal compared with that created by easterly wave action. A ban on taking of worms from this area will put further pressures on other areas within the Estuary.</p>	(1)	<p>Recommendation amended. The taking of worms will not be prohibited; however, no access to the Estuary will be provided for this purpose.</p>	<p>Yes 1(a)</p>
<p>6. The plan should be amended to allow vehicles to drive along the beach south of Belvidere Beach using 4-wheel-drive vehicles or unregistered balloon-tired three- or four-wheel motor cycles. Such access not to be permitted landward beyond the vegetation line.</p>	(2)	<p>Plan amended as above, to allow greater access to the beach for licensed 4WD vehicles. However, unlicensed off-road vehicles will not be allowed.</p>	<p>Yes 1(b)</p>
<p>7. A clause should be included in the plan as follows: 'In the case of amateur fishing, arrangements for the use of unlicensed Off-Road Vehicles will be subject to permits with specified conditions, including areas of use, and for a period of 12 months'.</p>	(2)	<p>Plan amended as above, to allow greater access to the beach for licensed 4WD vehicles. However, unlicensed off-road vehicles will not be allowed.</p>	<p>Yes 1(b)</p>



SUBMISSION COMMENTS	(No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
8. The proposed ban on the use of vehicles from the cut to Belvedere Beach is opposed. Recreational fishers have traditionally had access by 4WD to this area. Access should be allowed under regulations which control the use of 4WD vehicles to limit their use to beach access only, subject to speed limit & exclude from designated swimming areas. (1)	(1)	As above, access to the beach by licensed 4WD vehicles will be increased, but with Buffalo and Belvidere Beaches to be set aside for pedestrians only. CALM agrees that vehicle use should be regulated, and wishes to liaise with the groups concerned to establish a code of conduct.	Yes 1(b)
9. We are opposed to the loss of traditional usage (4WD access) of the beach for anglers and the public. 4WD beach access should continue as long as: no dunes are traversed; no areas of bird breeding are interfered with; safe behaviour is exhibited by vehicle drivers. (1)	(1)	As above.	Yes 1(b)
10. If a permit for 4WD beach access is available to commercial operators only then this is unfair discrimination and should be acceptable for the recreational angler as well. (1)	(1)	Agreed. Access will be the same for both commercial and recreational fishers. A permit will not be needed: recommendations amended.	Yes 1(b)
11. Continued access along the beach south to the Cut should not cause any undue problems. It should be possible to arrange for self-policing among vehicle user groups and review the situation when the numbers using other areas of the Park have increased substantially or when any conflict is evident between user groups. (1)	(1)	Plan amended as above.	Yes 1(b)
12. Recommendations 7 and 9, page 44, and 13, page 45, for restricted access by vehicles in strongly supported. (1)	(1)	Support for the plan. However, as a result of a strong public interest in having vehicle access south of Belvidere Beach, this will be allowed. Following discussions with groups concerned, cooperation with CALM is expected. The aims of protecting the dunes and minimising conflict between users of the beach are likely to be better achieved in this way.	No 2(a)
13. Sandboarding is increasingly popular on the peninsula. Fragile dune vegetation is being damaged by boards and by people walking up vegetated slopes to the dune tops. This has the potential to accelerate erosion of the dunes and initiate new blowouts. A new recommendation should be added:	(1)	Mention now included in text, and new recommendation added.	Yes 1(a)
<ul style="list-style-type: none"> <li>• Prohibit sandboarding on the Leschenault Peninsula. If demand persists, liaise with user groups, with the aim of locating suitable areas and providing funds for management of sandboarding. If no area and funding arrangements suitable to both CALM and users can be found, sandboarding will remain prohibited. (1)</li> </ul>	(1)		

SUBMISSION COMMENTS (No. of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>14. Opening the Park to 2WD access to Belvidere Beach has resulted in an increase in the 4WD use of the beach southwards of there. The arguments for restricting 4WD use (for recreation and professional fishers) to the northern section of the beach is strong and should be supported. The lack of management presence has no doubt also contributed to the increase in inappropriate use of 4WD vehicles. (1)</p>	<p>Support for the plan. However, as a result of a strong public interest in having vehicle access south of Belvidere Beach, this will be allowed (see above).</p>	<p>No 2(a)</p>
<p><b>24. DOMESTIC PETS AND HORSERIDING</b> <i>No submissions.</i></p>		
<p><b>25. PUBLIC SAFETY</b> <i>1 submission.</i></p>		
<p>1. CALM should install satisfactory signage to inform the public about mosquitoes, and consideration needs to be given, in conjunction with the Health Department of WA, to how to control mosquitoes.(1)</p>	<p>Covered in Section 25 and its recommendations.</p>	<p>No 2(d)</p>
<p><b>26. INFORMATION, EDUCATION AND INTERPRETATION</b> <i>1 submission.</i></p>		
<p>1. An education and awareness program should be implemented to ensure members of the public understand why natural ecological processes will be allowed to continue. (1)</p>	<p>Covered in the objectives of this Section.</p>	<p>No 2(d)</p>
<p><b>27. COMMERCIAL CONCESSIONS</b> <i>1 submission.</i></p>		
<p>1. Commercial development is supported. Any structure must blend in with the natural landscape.(1)</p>	<p>Support for the plan.</p>	<p>No 2(a)</p>
<p><b>28. MANAGEMENT ACCESS AND INFRASTRUCTURE</b> <i>1 submission.</i></p>		
<p>1. The statement 'a formal easement may be required for the Kemerton pipeline', must include reference for the need to consult with the Dept of Resources Development, because the SCM pipeline serves a project that is subject to a State Agreement Act. Approval has been granted to Western Power in relation to the Collie power Station to construct another pipeline alongside the existing one. (1)</p>	<p>Text expanded to include reference to the Department of Resources Development.</p>	<p>Yes 1(c)</p>
<p><b>29. RESEARCH AND MONITORING</b> <i>No submissions.</i></p>		
<p><b>30. INTERACTION WITH OTHER ORGANISATIONS</b> <i>No submissions.</i></p>		
<p><b>31. ADVISORY COMMITTEE AND COMMUNITY LIAISON</b> <i>2 submissions.</i></p>		

<i>SUBMISSION COMMENTS</i> (No. of Submissions)	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
<p>1. LIMA representation on the proposed Leschenault Peninsula Community Advisory Committee should be considered to ensure that waterways management issues are kept in mind at all times. (1)</p> <p>2. The Department of Resources Development should be included on the Advisory Committee with the regards to the liquid effluent disposal pipeline and the mineral titles over the area. (1)</p>	<p>Noted. Will be considered when advisory committee established.</p> <p>Noted. Will be considered when advisory committee established.</p>	<p>No 2(c)</p> <p>No 2(c)</p>
<p><b>32. EMERGENCY EVENTS</b> <i>No submissions.</i></p> <p><b>PLAN IMPLEMENTATION</b></p> <p><b>33. FUNDING AND STAFFING</b> <i>No submissions.</i></p> <p><b>34. PLAN REVIEW AND MONITORING</b> <i>No submissions.</i></p> <p><b>35. STAGING AND PRIORITIES</b> <i>No submissions.</i></p> <p><b>REFERENCES</b> <i>No submissions.</i></p> <p><b>TABLES</b> <i>No submissions.</i></p> <p><b>APPENDICES</b> <i>1 submission.</i></p>		
<p>1. In the final plan the footnotes to Appendix 2 should:</p> <ul style="list-style-type: none"> <li>• in respect of the footnotes designated by an ‘*’ on page 73 and a ‘1’ on page 80, state: <i>Indicates a ‘threatened’ fauna species declared under the Wildlife conservation Act 1950 as ‘being fauna which is rare or likely to become extinct’;</i></li> <li>• in respect of the footnotes designated by a ‘#’ on page 78 and a ‘4’ on page 80, state: <i>Indicates a fauna species declared under the Wildlife Conservation Act 1950 ‘to be fauna that is in need of special protection’;</i></li> <li>• in respect of the footnote designated by an ‘8’ on page 80, be in the same font as the preceding footnotes;</li> <li>• in respect of the footnote designated by a ‘9’ on page 80, be in the same font size as footnotes 1 to 6. (1)</li> </ul> <p><b>FIGURES</b> <i>No submissions.</i></p>	<p>Amendments made to text.</p>	<p>Yes 1(e)</p>



## APPENDIX 1: SUBMITTORS TO THE DRAFT MANAGEMENT PLAN

The submitters are grouped according to whether they were individuals, community organisations, State Government Departments or Local Government authorities. Within each group they are listed in the order in which they were received.

### Individuals

J D & L M Clarke  
R Hiller  
Coonawarra Nominees Pty Ltd  
K Hughes  
C & D Robinson (*form letter type 2*)  
M Wytenburg (*form letter type 2*)  
K Mavrantonis (*form letter type 1*)  
H Dowdell (*form letter type 2*)  
W & R Morris (*form letter type 2*)  
M Kolman (*form letter type 2*)  
Scibilia family (*form letter type 2*)  
M Cadden (*form letter type 1*)  
R J F Stretton (*form letter type 1*)  
W C Wilson (*form letter type 1*)  
A I Reynolds (*form letter type 1*)  
G Holman (*form letter type 1*)  
R Parker (*form letter type 2*)  
J Agnello (*form letter type 2*)  
M Head (*form letter type 2*)  
F Neal (*form letter type 2*)  
S Evans (*form letter type 1*)  
J A Maurautouis (*form letter type 1*)  
G T McBride (*form letter type 1*)  
R Lorimer (*form letter type 1*)  
M Harrold (*form letter type 1*)  
E Hammond (*form letter type 1*)  
J Horwath (*form letter type 1*)  
L Birchall (*form letter type 1*)  
D Sullivan  
J Bartolomei (*form letter type 1*)  
T M Burnett (*form letter type 1*)  
R Smith (*form letter type 1*)  
G D Paine  
P B James (*form letter type 1*)  
A Gillow (*form letter type 1*)  
M Sinclair (*form letter type 1*)  
(confidential)  
C Ingram  
P Henderson  
P de Tores  
G Keighery  
R Powell

### Community Organisations

Bunbury Angling Club  
South West Licensed Fishermen's Assoc.  
South West Regional Recreational Fishing  
Advisory Committee, W.A.  
Southwest Recreational Diving & Fishing  
Assoc.  
The Surf Casting & Angling Club of W.A.  
(Inc.)  
Belmont R.S.L. Fishing Club (*form  
letter type 1*)

W.A. Recreational & Sportfishing  
Council (Inc.)  
Quinns Rock Fishing Club (Inc.) (*form  
letter type 1*)

State Government

Department of Environmental Protection  
Western Australian Tourism Commission  
Leschenault Inlet Management Authority  
Department of Resources Development  
Department of Minerals & Energy  
Fisheries WA

Local Government

Shire of Harvey