



Analysis of Public Submissions

The Parks of Western and Central Kangaroo Island Draft Management Plan Amendment 2023

The Parks of Western and Central Kangaroo Island Draft Management Plan Amendment 2023 was released for public consultation from 11 December 2023 to 11 March 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.

8 submissions were received consisting of 3 written response and 5 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 amendments, or recommended the inclusion of detailed or prescriptive information that is not appropriate for a strategic plan of this type;
7. Feedback proposed an alternative approach but the recommendation of the draft plan amendment was still considered the most appropriate option;
8. Feedback was based on incorrect information;
9. Feedback offered an open statement, or no change was sought.



Table 1: Submissions received

Sub #	Name	Respondent
1	Sue Merchant	Park visitor, Interested individual, Local community member, Environmental volunteer
2	Kendra Radford	Interested individual, Environmental volunteer
3	Sarah Campbell	Park visitor, Interested individual, Environmental volunteer
4	Sarah MacDonald	Park visitor, Interested individual, Environmental volunteer
5	Sam Woods	Interested individual
6	Friends of Parks KI Western Districts	Friends group
7	Topa Petit	Researcher
8	Peter Martin	Landowner conservation association



Table 2: Analysis of feedback

Number	Comment	Submission Number	Plan Altered	Response	Criteria
General					
1.	Provided general support for the direction of the plan amendments. Great idea, Improved biosecurity, Joining trails to make loops is a good thing.	2,3,4,5	No	Submissions supported the plan with no changes sought.	4
2.	I hope all the campsites are just that and not permanent glamping setups	4	No	Out of scope of these amendments, which were focussed on track updates on mapping.	6
3.	Did not support the amendments - I do not support the extra walking & bike trails.	1	No	Amendments were focussed on track mapping updates for accuracy, not adding extra walking and bike tracks to the existing plan.	6
4.	I do not support the privatised tourist pods	1	No	Out of scope of these amendments, which were focussed on track updates on mapping.	6
5.	The park should be kept as undeveloped as possible, especially after the fires.	1	No	Out of scope of these amendments, which were focussed on track updates on mapping.	6
6.	There is enough infrastructure to satisfy tourists.	1	No	Out of scope of these amendments, which were focussed on track updates on mapping.	6
7.	Visitors want to experience the wildness if Flinders Chase not the pithy infrastructure which can be found anywhere.	1	No	Out of scope of these amendments, which were focussed on track updates on mapping.	6
8.	Inconsistency regarding the use of icons for campsites. One icon on Figure 15a delineates the campground, but not on Figures 5a, 10a, 12a.	6	No	The camping icon is used in 15 and 15a as the map is larger scale and the location is named, Rocky River, but the campsite is not named or identified. In the other maps, the scale is finer and the campsites are referred to specifically, and therefore do not require the campsite icon.	8
9.	Inconsistency between the use of 'Campground' and 'Campsite', with both occurring on the same map (eg. Fig 10a). Is there a difference between the two? If there is, this need to be explained. If they are the same, then standardisation of names and the use of icons should take place.	6, 7	No	Noted. Broader naming of campsites is not the role of management and was not the focus of this Amendment and is therefore out of scope. Standardisation can be considered as part of any new planning process for these parks in the future.	8



10.	Orange dotted lines are used to delineate Visitor Use Zones but the Snake Lagoon and Cup Gum Campgrounds and the Banksia Campsite have a solid, not a dotted line. Are these Visitor Use Zones? If not, why are the Australian Walking Company (AWC) sites designated as Visitor Use Zones?	6, 7	No	The same dotted lines are used for all sites, The gaps have been compressed by the mapping program due to being circular/oval, making it appear to be a more solid line. As these are Visitor Use Zones, no edits are required. Utilising different graphics to ensure clarity of mapping can be considered as part of any new full plan development in the future.	8
11.	Pages 6 & 7 Amendment 2: Figure 10a. The private site of the AWC development at Maupertuis Bay is listed as a campsite. As this site contains at least 11 buildings, this is not a campsite but should more properly be described as an accommodation hub. This misnaming also occurs on Page 11, Figure 12a where the Sanderson site with its 11 buildings is also called a campsite. The naming of the site has changed from the 2022 plan's Figure 12 where it was more rightly called accommodation. The buildings on the two AWC sites are not designated on the respective maps (Figures 10a/12a) unlike Figure 5a which identifies individual buildings.	6	Yes	The AWC sites are fully described in the text on page 20 of the Parks of Western and Central Kangaroo Island Management Plan 2022. The map's role is to give a geographical location of the site. Changing of site names was not in scope for the Amendment process, which was to adjust trail locations on some maps within the document. Map 5a shows general buildings present at the time of mapping as a guide. As there were no buildings at the AWC campsites at the time of mapping, they are not shown in the maps. In Figure 12 it is named on the map as Maupertuis Bay Campsite. Only the Title of map 12a has been adjusted to match the name on the map. Figure 10a has been renamed to better reflect naming on the map.	6
12.	Page 12 Amendment 4 East Melrose Track Realignment While the text describes the new section of the KIWT it doesn't give any description of the changes to the East Melrose Track or the rationale behind them, unlike the descriptions to the changes elsewhere.	6	Yes	The changes to East Melrose Track are described in Parks of Western and Central Kangaroo Island Management Plan 2022 and relate to Figure 15. Additional text has been placed into the final Amendment documentation noting the text relates to Map 15a.	3
13.	Pg 15 Amendment 5. Creating exceptional visitor experiences We maintain our vehement opposition to any plans to extend development into untouched areas of the Flinders Chase National Park and other parks, Wilderness Protection Areas and reserves of the western and central areas of Kangaroo Island. Development of new walking trails within the parks must always be subservient to the protection of the natural environment. The development of	6	No	Noted. The added text relates to the new trail linking the new visitor centre to the Kangaroo Island Wilderness Trail and shown in map amendment 15a.	6



	new cycling trails in Flinders Chase National Park is not supported under any circumstances.				
14.	While these amendments largely address our concerns about the specifics of maps which were published contrary to a clear prior agreement, there is a broader issue of how fit-for-purpose this plan is, especially when compared with the far superior plan for the parks of eastern KI. There was perfunctory community consultation, feedback was largely ignored, and the cobbled together document was rushed through immediately prior to a State election. The inadequacies of this plan will only be fully addressed by a complete rewrite, following extensive and genuine community consultation.	6	No	Noted. Out of scope for this Amendment process	6
15.	Comments regarding the original plan development and consultation process	7	No	Amendment process was focussed on updating specific maps in the Parks of Western and Central Kangaroo Island Management Plan 2022.	6
16.	Removal of Maupertuis Bay Campsite replaced by one at Snake Lagoon	7	No	Removing campsites not part of this Amendment.	6
17.	Query regarding the Visitor Use Zones, if they denote private property, what is the zoning for Flinders Chase NP.	7	No	Zoning is explained in the Parks of Western and Central Kangaroo Island Management Plan 2022 and are not the focus of this amendment	6
18.	Use of the term 'explore' in the management plan in relation to new tracks or trails	7	No	The language around tracks and trails in parks was not the focus of the amendment, adding detail to maps was and this section of the amendments is adding new text relating to detail added via Map 15a.	6
19.	Rewrite the Parks of Western and Central Kangaroo Island Management Plan 2022 and outline why not followed the feedback to that document.	7	No	Noted. Amendment process was focussed on updating specific maps in the Parks of Western and Central Kangaroo Island Management Plan 2022. Analysis of submissions from the Parks of Western and Central Kangaroo Island Management Plan 2022 consultation period is available on the NPWS Management Plan website. That document outlines all submission themes and the response.	6



20.	Provided 2 submissions made on the Parks of Western and Central Kangaroo Island Management Plan 2022.	8	No	Submission did not relate to the Amendment document which was the focus of consultation and focussed on the original plan development in 2022. This content was out of scope for this consultation on the Amendment document.	6
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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	Name	Open text
2	Postcode	Open text
3	What is your relationship with these parks?	Checkbox and open text
4	Are you completing this survey as an individual, or as a representative of an organisation or group?	Checkbox and open text
5	Do you support the proposed amendments to the trail maps relating to Flinders Chase National Park in the plan?	Checkbox
7	Why do you support/not support these mapping amendments?	Open text