

Analysis of Public Submissions

Lake Gairdner National Park Draft Management Plan

The Lake Gairdner National Park Draft Management Plan was released for public consultation from 17 January 2019 to 17 April 2019. Eleven submissions on the draft management plan were received. These are summarised in Table 1 below. All submissions on draft park management plans are carefully reviewed against set criteria.

Feedback meeting criteria 1-3 below, result in alterations:

1. Feedback provided additional information of direct relevance to management;
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 plan;
6. Feedback addressed issues beyond the scope of the plan, or recommended the inclusion of detailed or prescriptive information that is not appropriate for a strategic plan of this type;
7. Feedback proposed an alternative approach but the recommendation of the draft plan was still considered the most appropriate option;
8. Feedback was based on incorrect information;
9. Feedback offered an open statement, or no change was sought.

A summary of all feedback received and any changes arising is provided in Table 2.

Table 1 – Summary of submissions

Submission Number	Name and organisation
1	Richard Blanden Individual
2	Julia Peacock Nature Conservation Society of South Australia
3	John Reid Gawler Ranges Aboriginal Corporation
4	Howard Ludgate Individual
5	Ian Westlake Friends of Gawler Ranges National Park
6	Greg Wapling Dry Lake Racers Australia
7	John Barker Department of Energy and Mining
8	Albert Quinn Individual
9	Darren Leaver Individual
10	Rod Irvine Individual
11	Kim Krebs Individual

Table 2 – Summary of feedback

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
1	Expressed support for the continuation of permits for the land speed trials	1	No	No change necessary. The plan allows for activities such as the DRLA event to continue to be authorised via permit.	4
2	Suggested that a multi-year permit be granted to Dry Lakes Racers Australia (DLRA) on the condition they progressively invest in improved visitor facilities.	1	No	The issuing of permits for events is managed by the Board and the Gawler Ranges Aboriginal Corporation. Streamlining the management of this process is outside the scope of this plan. However, these comments have been passed onto the Board and DEW staff.	6
3	Suggested that additional visitor access points to the park be created.	1	No	The parks is surrounded by pastoral properties. The creation of additional access points via private roads is outside the scope of this plan. DEW and the Board will continue to liaise with pastoralists regarding opportunities to improve the two existing access points and investigate new access points.	6
4	Suggested that the park should provide information on how visitors can connect with, and learn about, the Aboriginal history of the area.	1	No	No change. The plan already includes strategies to offer more experiences for visitors, including opportunities to learn more about Aboriginal culture and co-management. However, this suggestion will be passed onto the Board and local DEW staff.	5
5	Recommended that the final plan include a statement to clarify that its intended purpose is not to specify strategies to address all issues confronting the Park but rather that it seeks to provide an overview of management arrangements and outline key priorities for long term management.	2	Yes	The 'Developing this plan' section has been altered to include this statement.	2
6	Expressed support for the plan	2, 3, 5	No	No change necessary. Supportive of plan.	4

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
7	Recommend the plan acknowledge that the Gawler Ranges area was historically an extremely important refuge for the Night Parrot (<i>Pezoporus occidentalis</i>)	2	No	Further research is needed to determine the extent of species supported by the park in order to inform future management goals. A statement to this effect has been included in the plan.	7
8	Provided minor editorial suggestions and corrections	2, 11	Yes	The final plan has been corrected where appropriate.	3
9	Suggested the plan identify that the management of threatened species to ensure their long-term conservation is a significant challenge, particularly in response to climate change.	2	Yes	An additional point has been added into the 'Challenges and opportunities' section on page 12.	2
10	Recommended that the challenges posed in the management of pest plants and animals within the park is acknowledged given its remoteness and inaccessibility.	2	No	As the park is surrounded by pastoral properties, there is limited pest plant and animal control undertaken in the park. A strategy to contribute to any control programs has been included on page 10.	7
11	Suggested that the information regarding the regulation of mineral and petroleum exploration and production activities would be better placed in theme 2.	2	No	The information regarding the regulation of mineral and petroleum exploration and production activities directly relates to Theme 1 - Looking After Country. Additional information has been included in Theme 1 to better articulate these processes.	7
12	Suggested that it may not be practical for exploration and development activities to be regulated such that "they do not have impacts", as any type of exploration or development will impact on the Park.	2, 7	Yes	This statement has been removed from the third strategy on page 10 and the fourth strategy has been included to better articulate the intentions around management of impacts of any future mineral or petroleum exploration and production activities.	2
13	Recommended that the plan acknowledge the risk that large-scale bushfires pose to biodiversity as well as life and property.	2	No	As the park boundary predominantly follows the salt lake boundary, there is a very low risk of large-scale bushfires impacting upon or originating from this park.	7

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
14	Recommended that the Management Plan include a list of flora and fauna species of conservation significance that occur within the Park as an Appendix.	4	No	The species of conservation significance that occur in the park are listed in the significance and purpose section. As there is a short list the Board determined that an appendix was not necessary.	7
15	Expressed support for the monitoring of impacts of events such as dry lake racing on the Park. Suggested that the costs of enabling appropriate monitoring should be borne by those benefiting from that access.	4	No	No change. The permit requirements are set by the Board and the costs are paid by the permit applicant.	5
16	Commented that the organisers and participants of Speed Week greatly appreciate the opportunity to use the lake, take their responsibilities very seriously, and show continuous improvement as the event grows.	4	No	No change necessary. The plan acknowledges that the speed week event adopts minimal impact behaviours. This comment has been passed on to the Board.	9
17	Commented that the annual Speed Week event is a great opportunity to boost tourism in South Australia.	4	No	The intent to pursue opportunities around the speed week event is already identified in the plan.	9
18	Expressed opposition to mining on the lake and expressed concern regarding its potential impacts on park values.	4, 5, 6	Yes	The alteration of resource exploration and development entitlements is outside the scope of this planning process. However, the relevant regulations and protections that must be complied with in order to minimise impacts on the natural and cultural values of the park have been detailed more clearly on page 10.	3
19	Commented that income generated from commercial lake activities is a reliable and sustainable income source for the Gawler Ranges people.	4	No	No change. The aspiration to generate additional opportunities for Gawler Ranges Aboriginal People to benefit from commercial activities on the lake is already detailed in the plan.	5

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
20	Commented that facilities and access roads should be provided and maintained by National Parks SA. Acknowledged that improved access roads in particular would generate higher visitation and in turn, have greater impacts. Suggested that the park could be better promoted by DEW and SATC.	4, 6, 8	No	No change. The plan already includes strategies to enhance the visitor experience, however at most times of the year this is a low visitation park which does not require significant facilities. Consideration will be given to additional facilities at Waltumba Tank Camping Area as the need arises. DEW and the Board will continue to liaise with pastoralists regarding opportunities to improve the access points to the park.	5
21	Expressed opposition to the park being re-classified to a lower conservation status.	4	No	There is no intention to downgrade or abolish Lake Gairdner National Park.	8
22	Supported the plan's acknowledgement of the races on the lake, and commented that DRLA want to see the park protected and maintained in its pristine state.	6	No	No change necessary. Supportive of plan.	9
23	Commented that DLRA do not wish for their event to be a discouragement to any other organisation wanting to use the lake and do not seek exclusivity.	6	No	No change necessary. The plan provides scope for other events to be held on the lake, subject to the necessary permits and approvals.	9
24	Sought protection of the area used for land speed trials and requested that any permits for machinery on the lake be excluded from this zone.	6	Yes	Processes for the assessment and approval of mineral and petroleum exploration and production applications are outside the scope of this plan, however an additional sentence has been added on page 10 to clarify that this process aims to minimise impacts to the visitor experience.	3
25	Expressed disappointment regarding management of the permitting process for speed week and expressed the wish for a multiple year permit.	6	No	Permits for the DRLA event are dealt with outside of the planning process. The plan includes a strategy to better streamline the permit process. This comment has been passed onto the Board, DEW staff, and the Gawler Ranges Aboriginal Corporation.	6

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
26	Expressed the wish as an event participant to learn more about cultural significance so that it can be appropriately respected. Commented that the opportunities available at the DLRA event have not been utilised to date.	6	No	No change necessary. The plan already includes strategies to enable Gawler Ranges Aboriginal People to share their culture with visitors. Capitalising on these opportunities and building the relationship between GRAC and DLRA is outside the scope of this plan, however this comment has been passed on to the Board.	5
28	Commented that DLRA would be very interested in being involved in opportunities for Gawler Ranges Aboriginal people, local businesses, schools, and sporting clubs from the surrounding communities to benefit from events.	6	No	No change necessary. Harnessing the opportunities created by the DLRA event is already identified in the 'challenges and opportunities' section. Building these opportunities into the organisation and management of events is outside the scope of this plan, however this comment has been passed onto the Board.	5
29	Highlighted difficulties with the event permit and monitoring processes.	6	No	Management of the permit and monitoring processes is outside the scope of this plan. However, these comments has been passed onto the Board and GRAC.	6
30	Expressed support for the working on country program	6	No	No change necessary. Supportive of plan.	9
31	Highlighted issues with the practice of washing salt off vehicles at the lake's edge with water. Requested that it be a requirement for all vehicles accessing the lake to use blowers to dust off when entering the lake, and brooms to remove salt when leaving the lake.	6	No	As vehicles are not allowed onto the lake without a permit, this comment is best addressed through the permit assessment process. This comment has been passed onto the Board and if appropriate, will be built into permit requirements.	6
32	Expressed support for the location of the air strip during DLRA events.	6	No	No change necessary. Supportive of plan.	9
33	Commented that the plan should recognise that not only exploration rights but also production rights can be acquired and exercised within Lake Gairdner NP.	7	Yes	The plan had been altered on pages 2 and 7 to clarify that production rights are able to be acquired in the park.	3

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
34	Sought greater clarity around the intent and purpose of the zones in the plan.	7	Yes	The visitor use zone has been renamed to remove the reference to 'regulated activities'. The text in relation to mining on page 10 has been altered to provide greater clarity around the processes for assessment of mineral and petroleum exploration and production applications. Additionally, the language in Theme 2 has been altered to clarify that appropriate access refers to visitor use and permit-based activities, not mineral and petroleum exploration and production licences.	3
35	Sought greater clarity in the plan regarding assessment of mining applications against park values	7	Yes	The plan has been altered on page 7 to provide greater clarity on the processes for regulating mineral and petroleum exploration and production.	3
36	Sought clarity as to why Theme 2 does not address mining in the context of 'appropriate access' and 'regulated activities'.	7	Yes	The language in the plan has been altered to clarify that Theme 2 focusses on visitor access and permit processes for events, commercial filming/photography, and commercial tours. The processes for assessing mineral and petroleum exploration and production applications have been more clearly articulated in Theme 1.	3
37	Commented that unrestricted access to parks should be encouraged unless such access would cause significant risk to biodiversity and/or cultural heritage.	8, 9, 10	No	No change. Parks in South Australia aim to conserve flora, fauna, natural features and cultural heritage whilst also enabling appropriate and sustainable visitor access.	9
38	Expressed support for the plan's intent to ensure Gawler Ranges Aboriginal People can maintain connections with their Country.	8	No	No change necessary. Supportive of plan.	4
39	Commented that the plan should provide more detail on how visitor experiences will be improved	8	No	Detailed planning for improvement of visitor facilities is outside the scope of this planning processes. The plan already includes strategies to enhance the visitor experience.	6

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
40	Commented that the plan should provide more detail on the permit process and how conditions will be developed	8, 11	No	Permit conditions are set by the Board and GRAC. These conditions may change from time to time and are not necessary for inclusion in a strategic document of this type.	6
41	Commented that the Plan should include an intent to allow the parks to be self-managed by traditional owners and park visitors.	8	No	The remote location and inaccessibility of the park means that very little management is required at most times of the year. Visitors can assist with park management by ensuring they leave camping areas as they found them, and by refraining from driving on the lake bed without a permit.	
42	Commented that the plan has the opportunity to not only allow appropriate management, but also to reconnect traditional owners to the land whilst allowing the broader community to learn from and appreciate this connection.	8	No	No change necessary. The plan has been developed for this purpose.	5
43	Asked which stakeholders were consulted in the early development of the draft plan	11	No	No change necessary. Stakeholders were consulted in the early development of the draft plan via a discussion paper inviting submissions.	9
44	Commented that DRLA were under the impression an ILUA was being developed between DEW and GRAC.	11	No	Outside the scope of this planning process. This comment has been raised with the Board for clarification.	6
45	Commented that working with pastoral leaseholders to enable better access and encouraging more events in the park should be identified as a challenge/opportunity	11	Yes	An additional point has been added in the 'challenges and opportunities section (page 7) to reflect this comment.	2

Comment No.	Comment	Sub No	Plan Altered	Proposed Response	Criteria
46	Queried why the DLRA event is specifically mentioned in the management plan and framed as the only event that occurs in the park.	11	Yes	The DLRA event is the only major event that occurs in the park and as such warrants some commentary in the plan. The plan clearly articulates that other events, commercial filming/photography, and commercial tours may be authorised in the park via a permit. However, the plan has been altered where appropriate to clarify that DLRA is not the only event that may be authorised in the park.	2
47	Specified that DLRA is an amateur sporting club, not a commercial interest. Suggested the addition of a new point on page 10 to support recreational and amateur sporting clubs and events to be able to co-design joint opportunities that have mutual benefits for all involved.	11	Yes	The language in the plan has been altered to clarify that DLRA is not a commercial interest. The third strategy on page 10 has also been altered to communicate the intent to pursue collaborative opportunities with event organisers and other permit holders.	3
48	Commented that the detail around scenic flights is very prescriptive.	11	No	This level of detail is considered appropriate for the plan.	7
49	Suggested that GRAC should have a greater presence at major events to facilitate cultural awareness and appreciation.	11	Yes	The fourth strategy on page 13 has been altered to articulate the need to facilitate greater opportunities for the involvement of GRAC at events.	2
50	Commented that the plan could reference the DLRA website as an information source.	11	No	Information from the plan has not been sourced from the DLRA website.	7