

Summary of Submissions

Community consultation was undertaken with Progress Associations, community groups and community members throughout the development of the first draft of the Coastal Management Strategy – Section One. A community meeting was held at Edithburgh Institute Hall on 29 April, 2019 to discuss the Strategy. Community meetings were advertised for Marion Bay and Corny Point but were cancelled due to a poor response (only one RSVP). Submissions were received by email and phone during the formal consultation period. Detailed below is the information captured during the formal consultation period.

Respondent	Area	General comments from public	Response	Amendment to Strategy
Respondent 1	Coobowie	Requested that the beach access at 112 Beach Road remains open as it used frequently.	Noted. Public consultation would be undertaken to determine consolidation of tracks.	Amend to include reference to public consultation process.
Respondents 2 and 3	Edithburgh	<p>Commented that they would like to stormwater management including underground catchment on the foreshore at Edithburgh with the water used to create a green, grassed foreshore.</p> <p>Commented that they would not like to see the current boat trailer parking overflow area near the boat ramp formalised with bitumen.</p> <p>Commented that the use of wire mesh across the cemetery fence could look untidy and would prefer a more permanent solution to the current open fencing which is resulting in plastic litter on the coastal reserve.</p>	<p>Noted. This falls under Parks and Gardens and has been referred to Assets and Infrastructure Services.</p> <p>Noted. This falls under Parks and Gardens and has been referred to Assets and Infrastructure Services.</p> <p>Noted. This falls under Parks and Gardens and has been referred to Assets and Infrastructure Services.</p>	<p>Amendment not required.</p> <p>Amendment not required.</p> <p>Update Strategy to capture preferred fencing.</p>
Respondent 4	Coobowie	<p>Commented that of the recommendations proposed, the sandpit (quarry) clean-up is the top priority for the Progress Association. There is no need to remove the rubble as the area needs to be built up with fill. Recommends starting work from the south west end with a view of returning it to a natural reserve with beach access.</p> <p>Discussed a potential walking trail through the area with plant identification.</p>	<p>Noted.</p> <p>Noted.</p>	<p>An alteration will be made to the Strategy to leave the rubble.</p> <p>Additional detail to be added to the Strategy.</p>

Respondent 5	Marion Bay	<p>Commented that it would be good to coordinate the weed control proposed south of the jetty with weed control of the adjoining Crown land.</p> <p>Commented that any upgraded paths in Marion Bay should be wheelchair/ pram accessible and wide enough for quad bike access so materials can easily be transported for any future community restoration/ revegetation projects.</p> <p>Commented that drop toilets emptied by a septic contractor are more cost effective than enviro toilets. People use the enviro toilets as rubbish bins throwing non-compostable items such as nappies and baby wipes into them, resulting in them not composting as intended.</p> <p>Enquired about the monitoring of assets and paths. Who would undertake this and at what cost?</p> <p>Commented that some fences around Penguin Point/ Willyama Beach are in poor shape and look untidy and would like to see cyclone fences removed and replaced with single strand wire where they are required.</p> <p>Commented that new signage is constantly being added to existing signage, particularly from the Fisheries Department. Could we possibly condense information to two large signs, one for safety matters and one for general information? Is there a policy that manages signage?</p>	<p>Noted.</p> <p>Noted. Paths to meet relevant standards.</p> <p>Noted. Toilet design must adhere to relevant legislation.</p> <p>Noted. This would be undertaken opportunistically by Council staff. Walking trails are already audited on a regular basis by Council staff. Any concerns can be reported to Council.</p> <p>Noted. Public can notify Council of fences that are of concern for inspection.</p> <p>Noted. Signage is currently regulated under Council By-Laws. Council to investigate the implementation of a sign template and signage policy.</p>	<p>Strategy to be updated to include liaising with Crown Land Office.</p> <p>Amendment not required.</p> <p>Amendment not required.</p> <p>Amendment not required.</p> <p>Addition to Strategy that fences in this area will be maintained and upgraded as required.</p> <p>Amendment not required.</p>
--------------	------------	---	---	---

Respondent 6	Corny Point	<p>Commented that a staircase at Point Annie may increase access to the beach. It is not a suitable swimming beach and this may be encouraged with steps. The current foot traffic is minimal, accessed mainly by fishermen. There are small goat tracks present.</p> <p>Commented that a staircase to Lighthouse Bay would be ideal as this is a popular beach and it is currently difficult/ dangerous to access.</p> <p>Enquired whether a second toilet at Berry Bay is necessary and raised that the visual impact would need to be considered.</p>	<p>Noted. Any staircase would be accompanied by appropriate signage.</p> <p>This is Australian Maritime Safety Authority (AMSA) land and will be referred to AMSA.</p> <p>Noted. A second toilet would not be an additional structure but incorporated into existing facilities.</p>	<p>Strategy to be updated.</p> <p>Amendment not required.</p> <p>Strategy to be amended to clarify second toilet location.</p>
Respondent 7	Marion Bay	<p>Commented stairs are required or simple modification / concreting of limestone rocks at the very western end of Willyama Beach. This western corner / cove provides great protection from certain wind direction and good fishing / exploring. The nearest stairs are nearly half way along beach towards Penguin Point.</p> <p>Commented road access from the Formby Bay carpark (or nearby) heading south behind Trespassers Beach and across Point Margaret is required to open up access for sight-seeing, fishing and surfing. Point Margaret hosts one of the best if not the best surfing break on the southern YP, but requires a long walk either across farmland (from Marion-Corny Road) or across behind Trespassers Beach and across cliffs to get to it, presenting a significant OH&S issue (in the event of injury, snake or shark bite). Even with this 40-60 minute walk each way surfers trek through farmland day after day. Point Margaret Beach is underutilised due to its remoteness and provides a beautiful extended sandy beach, rock pools and tidal pools. A car park at Point Margaret would maximise utilisation and visitation, spread crowding at Formby Bay region and reduce risk to stakeholders by having road access.</p>	<p>Stair design for this area (to join proposed viewing platform) is completed.</p> <p>Trespassers Beach and Point Margaret are private land and Crown Land. Local group Formby Bay Environmental Action Group undertake ongoing works to protect and conserve this area.</p>	<p>Strategy to be amended to include stairs.</p> <p>Council holds a License Agreement for the Walk the Yorke trail across Crown Land and can investigate improvements to the WTY trail. This additional information will be added to the Strategy.</p>

Respondent 7 continued	Marion Bay	<p>Beach access for 4WD vehicles should be re-opened from the Formby Bay North Carpark down to beach. This will encourage use, and greater interaction of visitors with nature, as opposed to viewing from afar. Places like Robe in the states SE attract many thousands of visitors every year for 4WDing along the coast, 60-80kms between Robe and Beachport, which proves it is possible in a safe and sustainable way. The issue is that when 'locking up' assets this discourage visitation and interaction all critical for the wild experience on offer. Additionally, the entire beach offers excellent salmon fishing but distance on foot from the carpark leads to fisher people not carrying away rubbish etc. By having vehicle access, this encourages connection and improves possibility of minimising waste being left behind like single use plastics, fishing line, bait bags, beer cans etc. In this day and age, infrastructure like cameras, signage, local regulations etc. can assist in ensuring dunes don't get consistently damaged. Drivers breaching protection laws (veering off track) would raise revenue through fines and recovery of bogged vehicles can also provide an income for local business (many parts around Australia have 4WD recovery experts who can be called in at a cost to bogged vehicle). By opening access and properly communicating the values etc. will only encourage engagement, connection and community watch.</p>	<p>Noted. Vehicle access is only possible across private land. This area has high cultural and environmental conservation value. Resources for infrastructure and to police compliance are not available. In addition, the environmental conditions place limitations on what infrastructure can be installed. There is currently easy walking access to Formby Bay. Local group Formby Bay Environmental Action Group have been undertaking ongoing works to protect this area for conservation for several years. Land based waste is currently minimal on this beach and increasing access could increase littering.</p>	Amendment not required.
Respondent 8 - Corny Point Progress Association	Corny Point and surrounds	<p>Commented on Point Annie revegetation site - last winter a lot of wheelies were done in this area. Sometimes caravans park there so it probably requires a vehicle deterrent of some kind around its border before any planting is done.</p> <p>Commented on dune damage on cliff base track, Gravel Bay. Council placed boulders there to reduce 4WD vehicles ploughing up the cliff face. The damage has continued in the area because the vehicles avoid the boulders. More boulders are required.</p>	<p>Noted. A caravan parking area is included in the recommendations, with revegetation to be adjacent. Vehicle deterrents will be included in the design to protect plantings.</p> <p>The boulders have recently been repositioned. This area will be monitored and more boulders installed if further damage occurs.</p>	<p>Amendment not required.</p> <p>Amendment not required.</p>

Respondent 8 continued	Corny Point and surrounds	<p>Commented on the compost toilet proposal for Gravel Bay - the location of this building should involve prior consultation to minimise inappropriate placement as occurred with South Berry Bay.</p> <p>Commented on closing tracks north of Point Annie - these positive suggestions should be actioned.</p> <p>Commented on the use of the term "Gonzos" - the Progress Association has endeavoured to get some historical consistency with local place names. Recently the Geographical Names Board approved the name "Dewdrop" for the sandy beach at the south end of Gravel Bay and the cliff that rises above this beach. The small car park on this cliff would thus be called Dewdrop (see December Facebook entry on Corny Point Progress Assoc. page). This is the name of the farm south of the car park. Whilst I would not wish to start a war with a few local surfers who named the surf break on this point, historical consistency should be maintained and only the surf break be named Gonzos. Point De Berg is the next promontory south of there.</p> <p>Provided additional details on revegetation of "Lighthouse Paddock" - Formby Bay Environmental Action Group has undertaken this project with assistance from the Young Environmental Leaders, NRM, Corny Point Progress and the community. It is on Council land adjacent to the Corny Point Base Station Marine System.</p>	<p>Noted. Consultation with Corny Point progress and FBEAG to occur before a position is finalised.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. The paddock area is AMSA and private land.</p>	<p>Amend to include reference to public consultation process.</p> <p>Amendment not required.</p> <p>Strategy to be updated with official names Dewdrop and Point De Berg.</p> <p>Amendment not required.</p>
Respondent 9	Daly Head National Surf Reserve	<p>Commented "Daly Head informal sand track with a few steps" - Council did a site plan of the proposed access stairs (2017).</p> <p>Commented "Walk the Yorke Gravel Trail in construction along coastline from Daly Head to Dust Hole". It is envisioned the walking trail will extend from the top of the Dust Hole steps to the top of the Blue Bay steps.</p>	<p>Noted.</p> <p>Noted.</p>	<p>Amendment not required.</p> <p>Strategy to be amended.</p>

Respondent 9 continued	Daly Head National Surf Reserve	<p>Commented "Recreational activities" - add snorkelling and bird watching</p> <p>Commented "Compost toilet at Salmon Hole car park" Council has a footing construction report and site assessment (2017).</p> <p>Additional comment - fence from Dust Bowl steps along south edge of Dust Hole car park along side road restricts vehicle access to dune/cliff top. This is viewed positively but requires upgrade.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>Strategy to be amended.</p> <p>Amendment not required.</p> <p>Amendment not required.</p>
Respondent 10 – Senior Property Officer	Crown Lands	<p>Commented in section 1.3 <i>Study Area</i> it is recommended that the first dot point of the list of land tenures be amended to 'Crown land under custodianship or perpetual lease to Council (Council care and control);' to reflect that coastal land is often dedicated Crown land, not perpetual lease land.</p>	Noted.	Strategy to be amended.
Respondent 11- Coast and Marine Program Manager, BirdLife Australia	All	<p>Commented would like to commend Council for consulting with BirdLife Australia's Beach-nesting Birds team in identifying sites of significance for beach-nesting birds such as the threatened Hooded Plover (<i>Thinornis cucullatus cucullatus</i>) and Sooty Oystercatcher (<i>Haematopus fuliginosus</i>). These species are not only of conservation concern, they also are valuable community flagships for coastal management and indicators of coastal health.</p> <p>Since 2010, we have worked with Natural Resources, Northern and Yorke and members of the community to engage them in BirdLife Australia's National Beach-nesting Birds Program, focusing on informing management of beach habitats to mitigate impacts to native resident, breeding shorebirds. The Beach-nesting Birds Program has trained volunteers and land managers in on-ground protection of priority breeding sites, as well as engaged local residents and schools to raise awareness and established the 'Friends of the Hooded Plover Yorke Peninsula' community group in 2012.</p>	Noted (all comments).	Amendment not required.

Respondent 11 – BirdLife Australia continued	All	<p>The Hooded Plover is classified as nationally Vulnerable under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and efforts to protect known breeding sites in particular, need to be prioritised. The Draft Strategy’s recommendations for sites of significance particularly in relation to controlling informal access to beaches and formalising campsites to ensure they are distanced away from known breeding sites will be of high benefit to Hooded Plovers and other beach-nesting birds. These are in line with the Federal Government’s Conservation Advice for the species which, a) identifies the Yorke Peninsula as an important population, b) recognises crushing or disturbance of eggs, chicks and nesting birds by human activities as a major threat, and c) recommends managing the use of (and access to) key beaches for recreation when plovers are breeding – e.g. discourage or prohibit vehicle access, horse riding and dogs from beaches; implement temporary beach closures; erect fencing to prevent people entering.</p> <p>Hooded Plovers are a Matter of National Environmental Significance according to the EPBC Act, and therefore it is critical that all efforts are made to mitigate threats to breeding birds.</p>		
Respondent 12 - Coast Management Branch, Department for Environment and Water (DEW)	All	Commented in general for the document that throughout the term dune erosion is used but sand dune drift is more appropriate for what is described e.g. on page 18.	Noted.	Strategy to be amended to ensure the distinction is clear between coastal erosion (loss of coastal lands due to the net removal of sediments or bedrock from the shoreline) and dune erosion (sand dune drift).

<p>Respondent 12 - Coast Management Branch, DEW continued</p>	<p>All</p>	<p>Commented in general for the document that broader coastal hazards such as erosion and inundation have not been included in the scope of the strategy (page 19). This is reasonable but it would be beneficial if it is acknowledged throughout the strategy. This will be important for areas where infrastructure will be installed e.g. walkways, toilets, shelter that may be at risk of coastal hazards in the future. At the very least a broad statement can be included where appropriate such as 'site may be subject to coastal hazards in the future and infrastructure should be deemed as expendable'. This will assist with identifying what level of investment should occur at the site.</p> <p>Commented regarding coastal land definition asking why this limit of distance. Some of the Council land adjacent the coast extend beyond 100m and have coastal processes occurring so should be included. Maybe reword to "The coastal zone is any open space Council land parcel that is adjacent to coast" optional extra " and contains coastal features or maybe subject to coastal hazards".</p> <p>Suggested it would be good if these maps (indicative areas of coastal Council land) could include labels for the towns and other locations discussed within the document, including the 3 sections of coast being looked at separately. Also this doesn't appear to include land that is under licence to Council, I assume this is managed similar to land that is dedicated to Council and therefore should be included on the maps.</p> <p>Commented some of the parcels in green below are examples of Council land that extends beyond 100m from the high tide mark on Map 2.</p>	<p>Noted.</p> <p>Noted. The existing definition is "The coastal zone is any open space Council land parcel that is either fully contained within, or is partly within, 100 metres of the high tide mark" hence at times including land that extends beyond 100 metres.</p> <p>Noted. Existing mapping does contain land that is under licence to Council.</p> <p>Noted (see comment above regarding coastal land definition).</p>	<p>Broad statement on page 19 to be amended (see comment below recommending sea-water inundation and coastal erosion be combined as a threat/risk) and to include "Where infrastructure is recommended to protect coastal land, impacts of coastal hazards now and in the future will need to be considered".</p> <p>Amend by adding "or contains coastal features and/or is subject to coastal hazards" to the existing definition.</p> <p>Mapping to be amended.</p> <p>Amendment not required.</p>
---	------------	--	---	---

<p>Respondent 12 - Coast Management Branch, DEW continued</p>	<p>All</p>	<p>Suggested add ", destroy invertebrate fauna within the sand," where it says "Vehicles on beaches disturb fauna such as beach-nesting birds....." (page 17).</p> <p>Suggested add (in italics) "Of particular concern is where <i>areas of particular significance or sensitivity are accessed, or when multiple tracks and/or access points are formed....</i>" (page 17).</p> <p>Suggested edit "breeding ability" to "breeding success (page 18).</p> <p>Suggested edit "sand dune formation" to "landforms" (page 18).</p> <p>Suggested edit "erosion" to "degradation that results in sand drift" (page 18).</p> <p>Suggested edit "erosion" to "degradation" (page 18).</p> <p>Commented on the threat/risk "coastal erosion" explanation as to why it is excluded from the scope of the Strategy - this is a little confusing as there are quite a few situations where protecting private property from erosion will impact the public land seaward of the site. It may be best to combine this with the inundation above and change to something such as: <i>Coastal hazards (eg. flooding and erosion) - assessments have been undertaken for a number of towns to determine the sea flood risk and adaptation options on behalf of Council. Investigations of coastal flooding and erosion hazards and appropriate adaptation measures will need to be undertaken and incorporated into coastal adaptation plans.</i></p> <p>Suggested edit "do not meet the study area requirements of open space land either owned or under the care and control of Council...." to "are not land but are infrastructure" (pg 19).</p>	<p>Noted. Invertebrate fauna are fauna, but there is a lack of awareness of them.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>Strategy to be amended to include invertebrate fauna.</p> <p>Strategy to be amended.</p> <p>Strategy to be amended.</p> <p>Strategy to be amended.</p> <p>Strategy to be amended.</p> <p>Strategy to be amended.</p> <p>Strategy to be amended. Retain existing clarification of responsibilities of landowners when not Council land. Include amendment listed against comment two (above).</p> <p>Strategy to be amended.</p>
---	------------	--	---	--

<p>Respondent 12 - Coast Management Branch, DEW continued</p>	<p>All</p>	<p>Suggested for strategy/control measure for camping (page 21) described as “Install/maintain/upgrade infrastructure to restrict public access to sensitive and hazardous areas and promote designated access” edit to add</p> <ul style="list-style-type: none"> • Infrastructure to delineate and formalise designated camping areas. • Ensure information is easily accessible to the public on where the designated camp areas are and the rules • Conditions of camping listed on camping permits • Camping inspector undertaking regular patrols of the coast to monitor and educate <p>Commented for first instance of declared weed noted with asterisk that there should be an explanation of asterisk within the document.</p> <p>Commented on the number of signs (existing infrastructure) at the Coobowie Estuary asking are all these signs necessary or can some be combined, as otherwise it will be a forest of signs.</p> <p>Commented for Coobowie where it has been noted formalised beach access points will not be included in the Strategy as they are Crown Land that these appear to be under licence to Council, so shouldn't they be included?</p>	<p>Noted. First two dot points are addressed under existing strategy/control.</p> <p>Noted. Asterisk is explained on page 14 under 'Vegetation assessment'</p> <p>Noted. These signs are existing infrastructure across a large area and therefore are spaced appropriately.</p> <p>Noted.</p>	<p>Amend to include last two dot points.</p> <p>Amendment not required.</p> <p>Amendment not required.</p> <p>Strategy to be amended to clarify distinction between Council land and Crown land.</p>
<p>Respondent 13 - Manager Aboriginal Heritage, Aboriginal Affairs and Reconciliation (AAR)</p>	<p>All</p>	<p>Provided a letter with information regarding a number of items, summarised as follows:</p> <ul style="list-style-type: none"> • Obligations under the Aboriginal Heritage Act 1988 • Accessing the Central Archive and the Register of Aboriginal Sites and Objects (Register), including the recommendations Council requests a search of the Central Archive for the areas outlined in the Plan and lodges regular search requests in relation to any proposed ground disturbing works 	<p>Noted.</p>	<p>Amendment not required.</p>

<p>Respondent 13 - Manager Aboriginal Heritage, AAR Continued</p>	<p>All</p>	<ul style="list-style-type: none"> • Aboriginal Heritage Management, including consultation with the Narungga community and consideration of engaging the services of suitably qualified heritage consultants when needed • Aboriginal engagement, namely the contact details for the Narungga Nations Aboriginal Corporation. <p>Suggested amending the 'Mission Statement' to read "in balance with landscape, heritage and biodiversity protection".</p> <p>Commented that for 'Section 2 How the Strategy was developed', Narungga cultural heritage may require its own dot point. AAR welcomes the reference to Narungga cultural heritage in the Plan however, referring to heritage as an 'issue' may have negative connotations. Consider an alternative word to "issues" to refer to Aboriginal heritage. Perhaps the word 'values' could be used.</p> <p>Commented for 'Section 2.4 Aboriginal Cultural Significance' AAR commends reference to the Register and the commitment to conducting regular checks of the Register when works are planned in relevant areas. AAR suggests that the final sentence of the first paragraph is amended to read - "...to ensure that the Strategy is both culturally-appropriate and compliant with relevant legislation".</p> <p>Commented for 'Section 4 Threats and issues management: Loss of Narungga heritage' suggest amending text to read – "...can lead to unintentional discovery and degradation".</p> <p>Commented for 'Section 4.2 – Loss of Narungga cultural heritage' suggest inclusion of the following into "How will progress be measured" – "Avoidance of damage, disturbance and interference to Narungga cultural heritage sites in the implementation of this plan." This would be the desired outcome and would indicate successful implementation.</p>	<p>Noted.</p> <p>Noted. Intent was for Narungga cultural heritage to be referred to as a management requirement.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>Strategy to be amended.</p> <p>Strategy to be amended with a 'Narungga cultural heritage' a dot point to make this explicit.</p> <p>Strategy to be amended.</p> <p>Strategy to be amended.</p> <p>Strategy to be amended.</p>
---	------------	---	--	--

Respondent 13 - Manager Aboriginal Heritage, AAR Continued	All	<p>Commented in Tables 5.1 through 5.26, the “Conservation and cultural significance” rows are an ideal place to reference Aboriginal site record information held on the Central Archive. The Council may then consider including one of the following descriptions below, based on the presence or absence of Aboriginal site records for each area:</p> <ol style="list-style-type: none"> 1) No known Aboriginal heritage sites, objects or remains in the vicinity 2) Aboriginal heritage sites, objects or remains identified in the vicinity 3) Aboriginal heritage sites, objects or remains exist within the specified location <p>This can then be matched to a related measure listed in the “Summary of site recommendations” row for each location. See suggestions below:</p> <ol style="list-style-type: none"> 1) No action required. 2) Appropriate strategies developed with the Narungga community, and a suitably qualified heritage consultant (where engaged), to manage the risk of impacting Aboriginal heritage within the specified location. 3) Authorisation under section 23 of the Act sought to impact Aboriginal heritage. 	Noted. As all recommendations are subject to available resources and hence will happen in time, as stated in the Strategy, Council will commit to conduct regular checks of the Register at the time when works are planned.	Strategy to be amended based on Aboriginal site record information most recently requested from the AAR by Council.
Respondent 14 and 15 - Staff	Marion Bay Multiple Sturt Bay Point Annie	<p>Recommend Fish Cleaning Bay north-east corner of jetty carpark to reduce disturbance of sand dunes and vegetation.</p> <p>Appropriate speed limits for Daly Head Bush Camp and coastal road to Dust Bowl/ Formby Bay North; Swincer’s Rocks Bush Camp; Foul Bay Bush Camp.</p> <p>Include ‘soft sand’ on signage at Sturt Bay.</p> <p>Point De Berg carpark and path to beach (north of Point Annie) requires some revegetation and erosion control.</p>	Noted. Noted. Noted. Noted.	Strategy to be amended. Strategy to be amended. Strategy to be amended Strategy to be amended.