

# **Independent Audit of the Analysis of Community Submissions**

Draft Plans of Management for Holiday Parks and other  
Crown foreshore reserves at Brunswick Heads

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March 2014

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### SUMMARY

The NSW Crown Holiday Parks Trust (NSWCHPT) prepared four draft Plans of Management (PoM) under the provisions of the Crown Lands Act (1989) to guide Crown Reserve management at Ferry Reserve Holiday Park, Massey Green Holiday Park, the Terrace Reserve Holiday Park and other Crown foreshore reserves at Brunswick Heads. The PoMs were released for public comment in December 2013 and the exhibition period ended 21 February 2014.

A total of 158 submissions, including a petition of 2,095 signatures, were received. NSWCHPT conducted the public exhibition process, including the review and categorisation of all public submissions.

This report documents the findings of an independent audit of the analysis of the public submissions. The independent audit was commissioned by NSW Trade & Investment, Crown Lands to ensure transparency and reliability of the methods and findings. The report has been prepared for the consideration of Crown Lands, the NSWCHPT Trust Board, and other interested stakeholders.

The purpose of this independent audit was to answer the following:

Does the “NSW Crown Holiday Parks Trust Summary of Submissions” provide a true and accurate record and a sound and defensible analysis of the content of the public submissions made on the draft POMs?

It should be noted that this independent audit does not attempt to determine the validity or salience of points raised in the public submissions, or the responses or recommendations of the Trust.

The independent audit consisted of two components:

- A systematic review of the analytical method used to code, summarise and present the issues raised in community submissions; and
- A blind audit of a random (representative) sample of community submissions to assess consistency and accuracy in the application of that method.

On the basis of this independent audit, it has been determined that the method used in the analysis of the submissions is sound and that the findings as documented in the tables that comprise the Summary of Submissions are comprehensive, thorough and reliable.

This conclusion is made, notwithstanding the following points:

- *The division of submissions into the categories of 'support/neutral/object' is not considered reliable for statistical purposes.*  
Numerous submissions contained a combination of supporting and opposing recommendations, and in such cases the inference that a submitter was either 'opposed' or 'supportive' of the plan(s) cannot be made with confidence. This statistic should be identified as indicative only, and used cautiously.
- *There is a discrepancy in the association of Issue Categories with Reserves between the Issues and Responses Table and the Statistical Info Table.*  
This is a result of several issue categories that apply to two or more reserve areas. As a consequence, using these tables to generate quantitative information yields significantly different results. To avoid potential confusion and to resolve this discrepancy it is recommended that the Reserve column be removed from the Statistical Info Table.
- *There is a discrepancy in the association of Issue Categories with Reserves between the Issues and Responses Table and the Recommendations Table.*  
This is a continuation of the previous point. To avoid potential confusion and to resolve this discrepancy, it is recommended that the Reserve column be removed from the Recommendations Table.
- *The submission of multiple, identical submissions has been handled consistently, but an alternative approach could be considered.*  
This observation relates to two types of submission:
  - Petitions with multiple signatories; and
  - Submissions that support or endorse the issues raised in other submissions.In the analysis, these types of submissions are regarded as one submission. An alternative approach would be to adjust the number of submissions column in the Statistical Info Table to reflect the total

number of times each issue was raised. This would not result in any changes to the recommendations, but could provide decision-makers and the community with a more accurate understanding of the relative importance of the Issue Categories.

- *Issues that were beyond the scope of the planning process were handled consistently, but an alternative approach could be considered.* Several significant and frequently raised issues that were beyond the scope of the planning process have not been included in the analysis. For example, issues raised concerning Park governance, the inconsistency of the PoMs with the regional character and the community engagement process featured prominently in the reviewed submissions but were not included in the analysis. In each case, these issues were considered by NSWCHPT to be beyond the scope of the PoMs or the Trust. However, the inclusion of these issues in the Issue Categories should be considered. This would not result in any changes to the recommendations, but could also provide decision-makers and the community with a more comprehensive understanding of points raised in the submissions.
- *Greater specification in the Issue Categories could be useful to increase the accessibility of the summary tables for decision-makers.* In most cases, the Issue Categories are sufficiently descriptive, but in a number of cases the Categories are broad, imprecise and require greater clarification. Examples include Issue Numbers 17 (Compliance), 21 (Cultural Heritage), 31 (General Criticism) and 159 (Sustainability). It is recommended that the description of the Issue Categories be revised to improve their descriptive clarity.
- *Three minor (non-substantive) data entry errors have been identified for correction.*

## PART A: REVIEW OF METHOD

In order to facilitate a review of the method used by NSWCHPT in the analysis of the community submissions, the Trust provided the following documents:

- The public exhibition drafts of the four Plans of Management (PoMs);
- A copy of all 158 submissions, including attachments and supporting materials; and
- The “Summary of Submissions” spreadsheet.

The Summary of Submissions is the analysis by NSWCHPT of the submissions, and consists of four interconnected tables:

- Submissions Received Table
- Issues and Responses Table
- Recommendations Table
- Statistical Info Table

In combination, these tables clearly demonstrate the method used in the analysis of submissions:

1. Each submission was given a unique ID, recorded in the Submission Received Table. This ID was used as a reference for all submissions, which also served to appropriately de-identify the data for analysis.
2. Each submission was closely reviewed to identify supporting or opposing statements relating to the PoMs. These statements were either summarised or transcribed verbatim in the Issues and Responses Table. Statements were also categorised according to their relevant PoM, which was included in the Issues and Responses Table.
3. Each submission was also categorised as a supporting, opposing or neutral submission, which was included in the Submissions Received Table.
4. Statements relating to a common issue or theme were subsequently grouped in Issue Categories. For each Issue Category, a response from the NSWCHPT was also provided. This information is provided in the Issues and Responses Table.
5. Where applicable, a recommendation arising from the Issue Category has been provided.

Using this method, 1,425 statements were identified from the 158 submissions. The number of statements identified in submissions varied widely. For example, four submissions each raised more than sixty issue statements. In total, 173 Issue Categories were developed, and 41 of the issue categories in turn generated a recommended change to the POMs.

## Evaluation

The method used to code, analyse and present the content of the community submissions is considered sound against the following criteria:

- The process and outcome is sufficiently well documented to be open to public scrutiny (transparency criteria)
- The process is applied consistently to all submissions without prejudice or bias (impartiality criteria)
- All submissions are included, and all issues raised in the submissions are given due consideration (comprehensive criteria)
- Each submission is considered on its individual merits, and given equal weight (equity criteria)
- The process respects the rights of submitters to confidentiality (confidentiality criteria)
- The process produces information that is useful, clear, in a flexible format and is suitable to aid in decision-making (accessibility criteria)
- The process produces information that can be relied upon by decision-makers (reliability criteria)
- The process demonstrates how the contributions have informed or otherwise contributed to decision-making (accountability criteria).

The approach is considered unsound against the following criteria:

- The process would produce the same results if undertaken by an another party (replicability criteria)

There is much to commend this method. It allows for a comprehensive, detailed and information-rich approach to the analysis of the points raised in submissions. The presentation of the information in indexed tabular format is considered to be especially beneficial for review purposes, and helps to embed transparency and accountability into the approach. The method also allows for some basic quantitative analysis, which provides decision-makers with an indication of the relative significance of different issues within and across the POMs, although caution should be exercised in the use of this data (see Part B below). Importantly, this method allows for the rapid generation of responses to inquiries that would allow submitters to see how their submission was handled. On request, this approach can almost instantly generate a summary of their submission, a response from the Trust and demonstrate how this issue has been included in revised drafts where applicable.

This method is not considered to yield replicable results. However this is not considered to adversely reduce or compromise the validity of the findings. In this type of thematic analysis, issue themes are generated from the submissions themselves, and not through a pre-determined thematic framework. As a result, a different interpreter may the code the information differently, thereby developing different thematic categories or interpretations.

Given that this method is well-documented, open and amenable to scrutiny, its limited replicability does not invalidate its use.

In reviewing the method, some basic quality control checks were used to assess the consistency, integrity, correctness and completeness of the dataset. These checks identified:

- One data-entry error was identified: the relevant Reserve was not included for Issue ID 815.
- There is a discrepancy in the association of Issue Categories with Reserves between the Issues and Responses Table and the Statistical Info and Recommendation Tables. This is a result of several issue categories that apply to two or more reserve areas. As a consequence, using these tables to generate quantitative information yields significantly different results.

In both cases, these 'errors' are non-substantive and easily resolved.

## PART B: AUDIT OF SUBMISSIONS

To review the reliability of the application of the method by NSWCHPT, a random sample of 25 submissions was reviewed based on the methodology developed by the Trust. This was then compared against the analysis spreadsheet used by the Trust. Variations between the two was evaluated and used as a prompt for closer examination of the data where necessary.

A random number generator was used to identify the sample (duplicates discarded). Table 1 below lists the Submission IDs of the sample, including the number of Trust-identified issues in each of the submissions. Figure 1 compares the breakdown of issues by Reserve in the sample and the submissions overall. This information was used to ensure that the random sample is broadly consistent with the whole dataset. On this basis, no adjustment to the initial sample was considered necessary.

<b>Audit Sample: Identified Issues by Reserve</b>						
<b>Submission ID</b>	<b>General</b>	<b>Foreshore</b>	<b>Terrace</b>	<b>Massey-Green</b>	<b>Ferry</b>	<b>Total</b>
1		1				1
28		3				3
37			2			2
46	1		2			3
53			1			1
54			2			2
64	2	16	10	17	14	59
83	1					1
91	1		1			2
93	3	7	3	6		19
103	1		2		1	4
104			2			2
107	3	6	2			11
115			2			2
117	1	2				3
118	1	3	1			5
120	1	3	1			5
121	1	1	1			3
123	1	1	1			3
134	2					2
136		2				2
140				4		4
146	1		1	1	2	5
147		2			1	3
152	1	8	3	1	1	14
<b>TOTAL</b>	<b>21</b>	<b>55</b>	<b>37</b>	<b>29</b>	<b>19</b>	<b>161</b>

*Table One: Issues identified in the audit dataset by Reserve*





**Figure 1: Comparison of proportion of submission issues in audit sample and overall submissions**

Each submission in the audit sample was subjected to the following review questions:

- Has the submitter information been correctly recorded?
- Has the submission been correctly classified as either Supporting/Objecting/Neutral?
- Have the issues raised in the submission been identified?
- Have the issues raised in the submission been accurately described?
- Does the response apply to the issue raised?
- Are there additional issues in the submission that have not been recorded?

The results of this review are tabled in Appendix A. This table uses a basic traffic light assessment to demonstrate the findings, where green is a satisfactory finding, orange is partially satisfactory, and red is an unsatisfactory review. The results and implications are reviewed below.

## Evaluation

**Submitter information:** This question was intended to fulfill a basic quality control test for the data. In only one case was the information entered incorrectly in the audit sample, where details for Submission IDs 36 & 37 were interchanged.

This question did highlight an issue in the handling of petitions. One of the audited submissions consisted of a petition with more than 2,000 signatories. For the purpose of analysis, this was treated as one submission. An alternative approach could be considered where the issue was recorded once per petitioner. This would not result in any change to the recommendations for changes to the PoMs, only to the data recorded in the Statistical Info Table.

**Supporting/objecting submissions:** On review, the statistics generated on the proportion of supporting or objecting submissions are not considered reliable. In the audit sample, one case was incorrectly categorised (opposed instead of neutral), and in four cases the submission contained both supporting and opposing statements and did not support a definitive judgment. In these submissions, an inference that a submitter was either opposed or supportive of the plan(s) cannot be made with confidence. Whilst this statistic could be a useful means of summarising the data, if it is used it should be identified as indicative only, and used cautiously.

**Issues described and summarised:** In all cases, the identification and summary of issues raised in the submissions was considered an accurate and defensible interpretation, assisted by the fact that the summaries frequently used direct quotes from the submissions themselves.

In three cases, however, the broad theme of Compliance (Issue ID 17) was used to capture a wide and diverse array of issues raised in the submissions. Given that the response and recommendation to each issue raised would be identical, dividing the Compliance Issue category into multiple categories would not substantively alter the results. However, it may provide a more accurate description of the issues raised in the submissions and therefore should be considered.

The review of issue summaries and theme categories also demonstrated that in some cases the Issue Categories are broad, imprecise and require greater clarification. This includes, for example, Issue Category 17 (Compliance), but also 21 (Cultural Heritage), 31 (General Criticism) and 159 (Sustainability). To understand the nature of these issues required much closer examination to determine what they referred to in individual submissions. For the purposes of improving clarity, it is recommended that the description of the Issue Categories be re-examined and revised where necessary to improve their wording.

**Response Applicable:** In each case, the responses to the issues raised were also reviewed. Importantly, the approach here was not to determine whether or not the comment was valid or legitimate, but only to ensure that it addressed the issue raised in the submission. The question was considered in the following way: does the response relate to the issue raised in a meaningful and reasonable way? In all cases reviewed, it was found that the response to the issue applied reasonably and sufficiently.

**Issues not included:** Finally, for each submission, the issues that were raised but not included in the analysis were documented. It is recognised and acknowledged that in this approach, only issues within the operational scope of the NSWCHPT were included in the analysis. This is considered valid and appropriate. The frequently recurring issues that were not included in the issue summary included:

- The incompatibility of the PoMs with the community character of the region (specifically in relation to the 'Simple Pleasures' slogan)
- Proposed alternative governance and management arrangements for the Holiday Parks (i.e. council managed)
- Inadequacy of the community consultation process
- Request for an independent review of submissions

The inclusion of Issue Categories for these issues should be considered. This would not result in any changes to the recommendations, but could also provide decision-makers and the community with a more comprehensive understanding of points raised in the submissions.

This question also identified the difficulty in handling submissions that support or endorse other submissions. For example, three submissions in the audit sample indicated that they endorsed the submissions made by two community organisations. This is analogous to the difficulty in the handling of petitions. Although in this analysis, the issues raised in those submissions were counted as one submission, an alternative approach would treat an endorsement as an additional instance of the issues being raised. This approach should be considered. The consequence of this would only be an adjustment in the number of submissions column in the Statistical Info Table. It would not result in any changes to the recommendations, but again could provide decision-makers and the community with a more accurate and nuanced understanding of the relative importance of each of the Issue Categories.

## ABOUT THE REVIEWER

Dr John Mackenzie is an Adjunct Research Fellow at the Socio-Legal Research Centre at Griffith University and a consulting social scientist and policy researcher. He has well over a decade of experience in academic, government and consulting roles, with a specific focus on the application of social science research methods to natural resource management and policy. His work applies social science techniques to support evidence-based decision-making, planning and policy development, with a particular focus on collaborative NRM planning, community engagement, social impact assessment and Indigenous natural resource management.

He has been a research fellow at two universities, a senior social scientist for the Queensland Department of Natural Resources and Water, and as a member of co-operative research initiatives including the Coastal Zone CRC, the Tropical Rivers and Coastal Knowledge Research Hub, and the Smart Water Research Centre.

## APPENDIX A: AUDIT TABLE

Submission ID	Data Record	Support/ Object	Issues Captured	Issues Described	Comment Applicable	Issues not recorded
1	YES	YES	YES	YES	YES	Small craft storage
28	YES	PARTIAL	YES	YES	YES	Ongoing maintenance (Banner Park)
37	NO (ID 36)	YES	YES	YES	YES	
46	YES	YES	YES	YES	YES	
53	YES	No (Neutral)	YES	N/A	N/A	
54	YES	YES	YES	YES	YES	
64	YES	YES	YES	PARTIAL (COMPLIANCE)	YES	
83	YES	YES	YES	YES	YES	Incompatibility with community character
91	YES	YES	YES	YES	YES	Independent review of submissions + alternative governance for parks
93	YES	YES	YES	YES	YES	Public consultation + alternative governance for parks + resubmission of S151 & S94
103	YES	YES	YES	YES	YES	Lot 7005 + Incompatibility with community character + internal road at Terrace
104	YES	YES	YES	YES	YES	
107	YES	YES	YES	YES	YES	Alternative governance for parks
115	YES	YES	YES	YES	YES	
117	YES	PARTIAL	YES	YES	YES	Incompatibility with community character + ongoing maintenance
118	YES	YES	YES	PARTIAL (COMPLIANCE)	YES	Alternative governance for parks + incompatibility with community character
120	YES	YES	YES	PARTIAL (COMPLIANCE)	YES	Alternative governance for parks + incompatibility with community character
121	YES	YES	YES	YES	YES	Resubmission of S151 & S94 + independent review of submissions + public consultation + alternative governance for parks
123	YES	YES	YES	YES	YES	Resubmission of S151 & S94 + independent review of submissions + public consultation + alternative governance for parks
134	YES	YES	YES	YES	YES	Composition of Reserve Trust Board
136	YES	PARTIAL	YES	YES	YES	
140	YES	YES	YES	YES	YES	Stormwater management
146	PARTIAL (petition)	YES	YES	YES	YES	

Draft PoMs for Holiday Parks and other Crown foreshore reserves at Brunswick Heads

147	YES	PARTIAL	YES	YES	YES	
152	YES	YES	YES	YES	YES	