



CPB 100/14/56/6

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Jason Bailey  
Project Lead Planning and Design Code  
Department for Planning, Transport and Infrastructure  
**By Email** [DPTI.PlanningReform@sa.gov.au](mailto:DPTI.PlanningReform@sa.gov.au)

Dear Jason

I am writing to you in relation to the draft “Planning and Design Code Phase 2 Rural Areas” (the Code) currently on public consultation.

A key consideration for the Coast Protection Board (the Board) is to ensure the Code advances State Planning Policy (SPP) 13 “Coastal Environment”, is consistent with Coast Protection Board policy and that important referrals to the Board are maintained while minimising unnecessary referrals.

Code policy appears generally consistent with SPP 13 and CPB policy. However, the following issues should be addressed:

- Offshore islands protected under the *National Parks and Wildlife Act 1972* or *Wilderness Protection Act 1992* should be zoned “Conservation”.
- The proposed Significant Landscape Protection Overlay is not mapped on Kangaroo Island and possibly elsewhere. The spatial application of current policy settings that protect coastal landscapes of high scenic quality needs to be reflected in the Code.
- ‘Coastal hazard risk minimisation policy’ does not apply to land outside of the Coastal Areas Overlay, e.g. Port Pirie, Fisherman Bay. This is particularly concerning with respect to flood hazard risks. Existing flood hazard policy (e.g. Development Plan General Section provisions and building site and floor level requirements at zone level), should be transitioned.
- Existing policy settings that enable relocation of specific shack sites (e.g. Black Point) need to be clearly articulated in the Code - the Rural Shack Settlement Zone may need refinement.
- The proposed “Conservation Zone - Dwelling Subzone” should only apply to coastal areas where existing local policy settings identify specific land parcels or precincts for

residential development (e.g. Lower Eyre Peninsula Development Plan, Coastal Conservation Zone Precinct Specific Provisions 22-34). Broader application of the Subzone (e.g. the entire Adelaide Plains Council coastline as proposed) is inconsistent with the Conservation Zone and Coastal Areas Overlay, and may lead to unreasonable development expectations.

The Board trusts that the Department for Planning, Transport and Infrastructure will work closely with the Department for the Environment and Water after submissions are closed to refine coastal policy. The Board can provide assistance as required.

The Board thanks DPTI and the State Planning Commission for the opportunity to comment on the Code and looks forward to helping progress subsequent stages.

For further information, please contact me via 8124 4928 or [DEWNRCoastProtectionBoard@sa.gov.au](mailto:DEWNRCoastProtectionBoard@sa.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to be 'Allan Holmes', with a long horizontal flourish extending to the right.

**Allan Holmes**  
**Presiding Member**  
**COAST PROTECTION BOARD**