Q1 Which part of the Planning and Design Code would you like to make a submission about? (Please click the circle to select which part of the Code you wish to comment on. You can also see which council areas are included in the rural and urban code via the links below.)

My submission relates to Rural code. (click here for council areas)

Q2 Please provide your contact details below (Name, Postcode & Email are mandatory) Please be advised that your submission will be made publicly available on the SA Planning Portal.

Name
Julie Jansen

Company
MasterPlan

Address
33 Carrington Street
Adelaide
SA
5000
Australia

Email Address

Q3 Which sector do you associate yourself with?
Development
Industry

Q4 Would you like to make comment on
Respondent skipped this question

Q5 Enter your feedback for Rules of Interpretation
Respondent skipped this question
Conservation Zone

Wrights Bay Camping Ground (legally described as Allotment 104, in Filed Plan 216847, Mount Benson, Certificate of Title Volume 5695 Folio 965) is a long-standing camping ground land use. Currently Wrights Bay Camping Ground is located across two zones, namely the Primary Production Zone and the Coastal Conservation Zone and under the PD Code would be in the Conservation Zone and Rural Zone. The PD Code identifies a camp ground as a desired land use and this is supported. However there is a discrepancy between PO 1.1 and DTS/DPF 1.1 and the “restricted development” table, which lists tourist accommodation as restricted. Further details of our submission on this matter are attached and forwarded by email.

Tourist accommodation definition

Clarification is required as to whether a camp ground is tourist accommodation. There is potential conflict in the Conservation Zone in relation to camp ground being envisaged and tourist accommodation being restricted.
21 November 2019

Dear Sir/Madam

Re: Submission – Planning and Design Code – Phase 2

MasterPlan provides this submission on behalf of Mr Grant Schubert, who is contracted to purchase land at Wrights Bay, Mount Benson which is commonly referred to as Wrights Bay Camping Ground.

Wrights Bay Camping Ground is legally described as Allotment 104, in Filed Plan 216847, Mount Benson, Certificate of Title Volume 5695 Folio 965. The camping ground is a long-standing land use, with evidence of its existence since at least the 1970’s (as per aerial photograph taken in 1978 below).

The campground continues to be actively utilised, as shown in the below Google Map images.
Currently Wrights Bay Camping Ground is located across two zones, namely the Primary Production Zone and the Coastal Conservation Zone, as shown below:

Subject land shown in green. Wrights Bay Camping Ground north of Wrights Bay Road. Zoning CstCon – Coastal Conservation and PrPro – Primary Production. Source: MapsSA.

Phase 2 of the Planning and Design Code (PD Code, consultation version October 2019) incorporates the subject land in both the Conservation Zone and Rural Zone (as shown below).
The Conservation Zone envisages tourist accommodation, as stated in the Desired Outcome Statement:

**Conservation Zone - Desired Outcome (DO)**

**DO 1**

The conservation and enhancement of the natural environment and natural ecological processes for their historic, scientific, landscape, faunal habitat, biodiversity and cultural values and provision of opportunities for the public to experience these through low-impact recreational and tourism development.

The Performance Outcomes (PO) are deemed to satisfy Designated Performance Outcome criteria (DTS/DPO) for the Conservation Zone lists “campground” as a land use that would be considered to be a small-scale, low impact land use within the zone (as quoted below).

**Land Use**

**PO 1.1**

Small-scale, low-impact land uses that provide for the conservation and protection of the area, while allowing the public to experience these important environmental assets.

**DTS/DPF 1.1**

Development comprises one or more of the following land uses:
- Advertisement
- Camp ground
- Farming
- Public amenity
- Renewable energy facility

This approach is supported, as a campground such as the Wrights Bay Camping Ground would now be readily identified as an appropriate land use. However, clarification is required as to whether a campground is a form of tourist accommodation, particularly given “tourist accommodation” is classified as a “restricted” form of development (with some exclusions that do not apply to the subject land). There is a substantial inconsistency in policy and process, should a “campground” be considered tourist accommodation.

It is noted that “tourist accommodation” is defined in Part 7 of the PD Code as follows:

“Means premises in which temporary or short-term accommodation is provided to travellers on a commercial basis”.

On the basis of this definition, a campground could readily be defined as tourist accommodation.
It is therefore our respectful submission that Table 4 – Restricted Development Classification of the Conservation Zone be amended to include or reference “campground” as an exclusion. In addition, we would seek the inclusion of the Wrights Bay Camping Ground into the “Visitor Experience Subzone”, as the campground clearly satisfies the desired outcome of the subzone, which supports “tourist accommodation to complement visitor experiences”.

Visitor Experience Subzone -Desired Outcome (DO)

DO 1

Tourist accommodation to complement visitor experiences, located within a conservation area and therefore located, sited and designed to minimise detrimental impacts on the natural environment and natural ecological processes including their historic, scientific, landscape, faunal habitat, biodiversity and cultural values.

On behalf of our clients, we seek that the transition of policy in the PD Code creates certainty for the Wrights Bay Camping Ground.

Should you require any further details on this submission, please do not hesitate to contact the undersigned by phone on 8193 5600 or 0413 832 616 or email juliej@masterplan.com.au.

Yours sincerely

Julie Jansen
MasterPlan SA Pty Ltd

cc: Grant Schubert – DC Robe
    DC Robe