

Submission in response to the Draft Rural Code Phase 2

Introduction:

One size fits all will fail.

One size fits all assumes the code will cover Mt Gambier, Mount Hope and Mount Hopeless equally well. This is akin to saying all 9 year old children should be in the same year level although their IQ range is 60 – 140 and their physical development is equally diverse.

Partial consultation does not equate to consultation. The draft is incomplete, the DPI and DEW have both told forums there are major errors and omissions in the draft. We lack the ability to test assertions digitally. The complex and confused one size fits all code has needed 2 years to be developed and needs a similar time to be properly scrutinized in any real consultation.

No computer digital process ever works well when first implemented especially Government run ones

The present process will ensure the final Code will have a short life.

With such a large document I have chosen one area to point out its inadequacies and I will focus on tourism within the document

It is obvious from a simple reading that one thrust of the Code is purely political. It is set up to facilitate the current Government ideology that money can be raised by getting people into accommodation in its numerous parks. These parks are already seriously under staffed making it difficult to fulfil their conservation roles.

A sensible first step would see every park has a Park Management plan approved with input from locals, friends of parks, volunteers and park staff. That is the place and method that should be used to consider where tourist accommodation can fit within the park system rather than your Code with its complex zones, subzones and overlays.

Where ever tourist accommodation fits in bushland of any type it will not get approval if the Hazards (Bushfire – Regional) Overlay is applied. The overlay requires tourist accommodation to be sited elsewhere in PO 1.1, PO 3.2, PO 4.1 and DTS/DPF 3.2 among others.

PO 1.1

Buildings and structures are located away from areas that pose an unacceptable bushfire risk as a result of:

- a. vegetation cover comprising trees and/or shrubs and/or unmanaged grasslands;
- b. poor access;
- c. rugged terrain;
- d. isolated location (e.g. more than 600m from a public road);
- e. inability to provide an adequate asset protection zone; and/or
- f. inability to provide a suitable site for an adequate supply of water for firefighting purposes.

PO 3.2

Residential and tourist accommodation (including boarding houses, hostels, dormitory style accommodation, student accommodation and workers accommodation):

- a. are sited away from vegetated areas that pose an unacceptable bushfire risk; and
- b. minimise the need to clear native vegetation.

PO 4.1

Land division is designed to:

- a. minimise fire risk danger to residents, other occupants of buildings and firefighting personnel;
- b. minimise the potential risk of damage to buildings and other property during a bushfire; and
- c. ensure each allotment contains a suitable building envelope that is located away from any vegetation that would pose an unacceptable risk in the event of bushfire.

DTS/DPF 3.2

Development meets the following requirements:

- a. an asset protection zone with a minimum width of 50m already exists and can continue to be maintained around the accommodation; and
- b. the asset protection zone is contained wholly within the allotment of the development.

It is essential that all National and Conservation Parks have a separate management plan where this overlay is applied prior to the Code being proclaimed. The already approved coastal tourist accommodation in KI's Flinders Chase National Park would not get approval under this code. And that is as it should be.

Kind Regards

Peter N Schultz

[REDACTED]
[REDACTED]
[REDACTED]