

November 28, 2019

To the State Planning Commission

Re: Submission on Phase 2 of the Draft Planning and Design Code, October 2019

Thank you for the opportunity to comment on this important document. Unfortunately, due to size and complexity of the Draft code, information and maps, I have not produced the quality of feedback that may have resulted from with a more concise, user friendly version.

As a member of Friends of Parks Kangaroo Island Western Districts, **I support the detailed submission made for Friends of Parks SA dated 24/11/2019** which comprises an incredible amount of time, patience and effort by volunteers from across the state.

Further comments below are relative to both the proposed state-wide plan and to rural plan amendments, which I make as a property owner on Yorke Peninsula and Kangaroo Island, being a permanent resident of the latter.

1. The size and complexity of this document makes it overwhelming for the average South Australian to comprehend. Clear identification of the **current content and proposed changes** for each region is required.
2. **The duration and level of consultation is not adequate, nor is the deadline for submissions** with token efforts of consultation taking place as late as the week submissions are due.
3. **A revised, clearer and accurate version** of the Code needs to be developed and taken to public consultation before being this code is adopted.
4. Why is there still **no overlay provided that identifies National and State Threatened Species populations or critical breeding/nesting habitats?** This does not need to identify species or exact locations but could be displayed with a non-specific buffer in the areas of known or suitable breeding habitats (particularly specialist species). This informs applicants of a potential issue at the start of the process, instead of important populations being seen as a 'blocker' to development at a later time. This is relevant for all types of development across the state. This is not even included in the Conservation zones!
5. Inclusion of a **Biodiversity layer** to include all aspects of functioning ecosystems including plants, animals and micro-organisms, soil, water and the complex relationships within them.
6. Development of wind farms, aerodromes and helicopter landing facilities for example must consider the **proximity to a diversity of species including woodland birds, bats and raptor breeding and foraging territories across the state**. Some of these have a conservation rating and others don't. It is also critical that they **avoid the territories of endangered coastal raptors on the mainland coast and offshore islands** (including Kangaroo Island).
7. Why do the maps show sections in National Park and Conservation Park as Rural and not Conservation? **Surely all State Government departments should have consistent zones! This is not something done in error!** These maps have clearly been made by someone in GOSA, possibly in preparation for changes to zoning

Management Plans to allow increased opportunities for grazing, apiary and extraction of resources. **Any proposed changes to park zoning requires an amendment to the Management plan and full public consultation under the National Parks and Wildlife Act (1972).**

8. The protected area maps zoned as rural include critical habitat for both State and Federally listed threatened species and their breeding refuges!
9. The maps show some offshore islands as 'no information available' others as 'Coastal Waters and Offshore Islands' despite their gazettal as **Conservation Parks** and in cases in both YP and KI also **prohibited areas**. This relates to all coastal regions.
10. Coastal Conservation zones, Conservation zones and Coastal Waters and Offshore Island zones should all be subject to **stringent environmental assessment due to complex ecological processes**. The SCAP approval process has proven to be totally inadequate in development applications in areas of high biological diversity and tourism developments have been assessed under Native Vegetation Regulations instead of the more stringent Native Vegetation Act requirements that trigger mandatory EPBC Act referral.
11. Tourist accommodation in Coastal Conservation zones can be **more detrimental to threatened species and their breeding habitats than residential dwellings**. The construction of the development itself is one threat, but the **cumulative impacts of numerous occupants for short periods can have a much higher impact than that of one permanent occupant**.
12. **The zoning is too broad and inaccurate**. Many parcels within rural zones are in fact in-tact old growth native vegetation, some under Heritage agreements. **These should be zoned 'Conservation' as they cannot be cleared or used for primary production** without breaching the Native Vegetation Act as it is a change of land use.
13. The Significant and Regulated tree overlay for the whole state needs to be accurate and incorporated into Biodiversity and Climate Change policies
14. Planning for all rural zones should include **considerations of Biodiversity**.
15. Planning for all rural zones should include **assessment against sustainable and regenerative primary production methods**.
16. Planning for all tourism development in conservation should include assessment against **ecologically sustainable criteria**.
17. All private developments in National Parks **must be subject to public notification, representation and appeal rights**. The parks belong to the people of South Australia.
18. All approved **Management Plans for National Parks must be automatically included in the new Planning and Design Code for South Australia**. This will ensure that environmental objectives are paramount in deciding what is or isn't appropriate by way of new development in our National Parks.
19. **Do changes to the code align with the goals and objectives of the adopted Kangaroo Island NRM plan 2017 -2017** (and all regional NRM plans)?

Caroline Paterson, [REDACTED].
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Cc Leon Bignell, State Member for Mawson