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To: [DPTI:Planning Reform Submissions](#)
Cc: mawson@sa.gov.au
Subject: Planning and Design Code for South Australia: rural code
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**Consultation Submission for rural code
Planning and Design Code for South Australia**

November 29,
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. My comments are as follows:

General feed back

There should be a zoning for future sea level rise impacted areas. Already this mapping has been done roughly for most coastal areas and many areas, such as Kangaroo Island, have detailed mapping of flooding potential which should be identified. The importance of this is exemplified on Kangaroo Island where places such as American River have the *Township activity centre* located in an area that will be seriously impacted by sea level rise in the next 30-50 years. Areas such as this need to have a zoning that reflect the limitations to ensure informed development occurs in the future and developments particularly town centres and residential areas, sewerage ponds and other council services are not put in totally inappropriate areas which will result in substantial cost to the community and government in the future. This document should be looking into the future as well as the past and present.

the rural shack settlement zone desired outcome is

Limited shack development within an environment where natural processes such as flooding, sealevel rise, sand drift and erosion occur. The natural environment is protected from inappropriate development and existing development is upgraded to incorporate environmental improvements.

This is another example where sea level rise needs to be a major consideration. Although mentioned, it reads as a secondary consideration not a primary consideration. Septic systems in areas of rising ground water and potential flooding should not be allowed but currently the focus is on raising the level of the house, not what goes under ground.

Conservation zone

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 importance of a comprehensive assessment of the impacts of development needs to be strengthened. The current State Government is reliant on the SCAP process to identify whether a development will have a negative impact on the environmental values rather than assess this for them selves (FCNP AWC tourist development as an example) therefore more stringent requirements are needed to assess this to ensure the desired outcome is met.

Currently the assessment is extremely inadequate and reliant on an EIS process which is carried out over a short period of time and limits impact assessment to threatened species rather than ecological processes. It does not consider the impact of sequential developments which result in the *death by a thousand cuts*. The process also puts greater weight on short term human values and profits rather than looking into the long term future, i.e. protecting natural resources for future generations. This is particularly important in

our conservation and wilderness parks which protect the last remaining intact ecosystems. The development plan needs to include a requirement for a comprehensive environmental assessment to be undertaken over a long period of time, or using long term data sets, which will identify if the development will degrade the environment and ecological processes, taking into account cumulative impacts of multiple developments. Development in wilderness should be non-complying. Development in intact ecosystems in a conservation zone should be non-complying.

Feed back for mapping

Why are so many of the conservation reserves on Kangaroo Island mapped as rural living including the Gosse lands, and parts of the Dudley and Simpson Conservation Parks? This needs to be rectified assuming it is a mapping error, other wise a public consultation process is needed.

Thank you for your consideration

Pip Masters

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Cc Leon Bignell, State Member for Mawson