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Mr Philip Frensham
Secretary
Environment, Resources & Development Committee
Parliament House
North Terrace
ADELAIDE SA 5001

Dear Philip,

Thank you for the opportunity to comment on the Ceduna Council Development Plan General and Coastal Policy PAR.

The Ceduna Council PAR incorporates the State Government's so called streamlined Development Policy of Better Development Plans (BDP) and the State Government driven Eyre Peninsula Coastal Management Strategy.

I am aware that Councils on Eyre Peninsula have expressed concern about the changes contained in their Development Plan PARs that they are being asked to sign off. Some of the changes are subtle and some, such as the large Coastal Conservation Zone that has been introduced in all Council areas, will have a significant impact on their residents and ratepayers. Councils, in response to the degree of concern expressed by ratepayers, undertook considerable investigative and mapping work in an attempt to reduce the impact of the proposed changes. **This unprecedented amount of effort by very small Councils should be an indication of the depth of concern being expressed that must be recognised by the ERD Committee.**

Ceduna Council has participated in a number of coastal development planning strategies over the years including the Great Australian Bight 1000 West Coast Strategy 1999 which was instigated by council with the help of the Eyre Regional Development Board.

In 2005/06 Planning SA approached the Eyre Peninsula Local Government (EPLGA) and member councils to work with them to again develop an Eyre Peninsula Coastal Development Strategy. It was to be a pilot project which would progressively be applied to other coastal areas around the State. Councils participated in the belief that a consistent framework across the region and beyond would help guide future development and provide consistency around South Australian coastlines.

I commended Councils for working in conjunction with Planning SA to develop a long term vision and policy to guide future development on coastal areas. **However I was extremely concerned**

that the Strategy appeared to be delivering a strong message of increased regulation and control which overruled any provision for economic development and growth.

When the Draft Coastal Development Strategy was released for public comment I questioned the premise that 'remote' areas are more fragile and therefore need more protection and made more inaccessible. I still question why 'remote' areas are more fragile than other areas and can not be sustainably developed. I believe this is just a way of ensuring that this region in particular stays undeveloped. Visitors who want to visit this region do not contribute towards the cost of keeping "a wild and pristine coastline" and they also expect a certain amount of development to allow them to visit. Why should 'remote' communities be further disadvantaged? These communities are custodians of their region – they love where they live and they don't want another "Glenelg" but closing all avenues for coastal development is neither fair nor responsible.

However my major concern at the time was that the Draft Coastal Management Strategy did not set out specific guidelines. The wording of the nine strategies took a broad view with 'motherhood' statements and a very generalised perspective. I suggested that it was therefore subject to differing interpretations and could result in quite draconian regulations being introduced. It is no surprise to me therefore that this is exactly what has happened.

Eyre Peninsula has 1650 kms of coastline dominated by rocky limestone cliffs. Only 15 percent is comprised of bays and embayments. Planning SA appears to have taken an 18th Century approach and drawn straight lines across a map using features such as main roads as boundaries of the zones. The Coastal Conservation Zone encompasses the entire length of Eyre Peninsula's coastline. This is concerning but what is alarming is that in many instances the inland boundary is a number of kilometres from the coast line. Councils were supportive of controlled and planned development but could not have possibly foreseen the extensive tracts of coastal land that are now effectively shut off from any form of development because they have been included in the Coastal Conservation Zone.

Maps in the Ceduna Council PAR indicated extensive areas of possible acid sulphate soils which have been included in the Coastal Conservation Zone. Yet information from the Department of Water, Land, Biodiversity and Conservation data and other sources indicates that there has been limited field inspection and therefore inadequate 'real' data available regarding the actual existence or extent of acid sulphate soils on Eyre Peninsula. It is inconceivable that vast areas of coastal land appear to have been annexed from future development using this methodology. The attendees at workshops for this and prior strategies all agreed that low lying areas of mangroves and samphire swamps would be part of a conservation zone. However what scientific evidence is available to justify 'locking up' land outside of these areas without proper field inspection?

Since the actual detail and specifics of the coastal policies were released by Planning SA there has been mounting concern about how restrictive and far reaching the policies are going to be. For example, are future wind farm developments, desalination plants, aquaculture projects, marinas, ports or boat ramps going to be permitted?

I am pleased to note that the previous restriction of only allowing nature based/eco-tourism developments to be located at a minimum of 25 kms apart has been deleted. I fully support the concept of nature based and/or eco-tourism developments however I question whether it should be the only concept allowable or possible outcome for tourism on Eyre Peninsula.

The 'feel good' platitudes contained in the Draft Coastal Strategy, such as "new coastal settlement or expansion will only be considered where the proposal is expected to yield social and economic benefits sufficient to outweigh any potentially detrimental impact on the coastal environment" are difficult to quantify, particularly by people who have no understanding of the interlinking dynamics

of these regions. What protection is in place to ensure the survival of small coastal towns, particularly when State Government funding is being distributed with a population based policy that means very little of it comes to these sparsely populated areas? There is already sufficient development controls and legislation in place to protect the environment but what is there to protect the rights of these freehold land owners and their small communities.

I am concerned that small coastal townships, such as Ceduna, Smoky Bay, Denial Bay and the other small settlements in the area, will not be able to take advantage of any mining spin offs as it appears that regional development and growth is going to be stifled. We do not want fly in fly out workers travelling between major cities and regional mines as this provides little local economic benefit to the region's small businesses. It is preferable that families are accommodated as close by as possible. Towns need to be able to sustain vital infrastructure and social fabric that is integral to their community's survival. The retention of essential services such as schools, acute care hospitals, banks, etc is vital to their continuing prosperity and growth. Limiting and restricting development will have a negative effect and will result in higher property and development costs and less volunteers and funding to look after the environment which is a counter productive result.

The principal concern expressed to me is that the BPD process and the merging of the Coastal Development Strategy has resulted in the State Government annexing large tracts of coastal freehold land. Traditionally there has been a 20 metre set back from high tide or cliff tops. During the perpetual leasehold free holding process this was increased to 50 then to 100 metres and beyond. In some instances, the freeholding exercise allowed the Government to claim significant tracks of coastal land with no compensation being offered to property owners who were in many instances third generation custodians. To add insult to injury, these land owners had to pay hefty surveying and fencing costs associated with freeholding. Under the Coastal Development Strategy the land owner is still the "owner" of the land however the list of non-complying developments outlined in the PAR is comprehensive; including farming, land division, dwellings (with a few exceptions), marinas, motels and tourist accommodation greater than 50 rooms and water tanks and dams, etc, etc. Effectively taking away their right to use the freehold land they own and again without compensation.

I urge the Environment, Resources & Development Committee to closely appraise the Ceduna Council's Development Plan General and Coastal Policy PAR and give serious consideration to the long term adverse implications of the Coastal Conservation Zone restrictions. I ask that a limit of a "100 metre only" Coastal Conservation Zone be introduced and to ensure the zone does not claw back into farmer's paddocks. Failing that it appears this could be a 'land grab' by the State Government at the expense of individual land owners and small rural communities. This State Government continues to create precedence's like those in this Ceduna PAR that will be used as the basis for others, will be difficult to overturn and detrimental to regional people and the long term prosperity of all the people of South Australia.

Yours sincerely,



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