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Mr. Vance Thomas  
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Dear Vance

### **Draft Eyre Peninsula Coastal Development Strategy**

I commend the Eyre Peninsula Local Government Association members for working in conjunction with Planning SA to develop a long term vision and policy to guide the future development of coastal Eyre Peninsula as a template for the rest of the State. Were you aware there is a State Parliamentary Inquiry into Coastal Development by the Environment, Resources and Development Committee? In addition there is also a Crown Land Draft Management Bill. Public submissions and comment closes on 27 October 2006 for both the Inquiry and draft Bill and I believe it would be beneficial if you could have input. (Advertisement and media release attached) Short term and long planning and development controls are vitally important and good planning will help to ensure supporting infrastructure is available and affordable. I am concerned however that there appears to be a strong message of increased regulation and control overruling any provision for economic development and growth.

With regard to this draft Strategy I question the premise that 'remote' areas are more fragile and therefore need more protection and made more inaccessible. Or is this another way of ensuring that this region stays undeveloped allowing visitors from metropolitan areas to see a 'wild and pristine coast' at the **expense** of local essential facilities and development?

Currently 85% of the Australian population live within 50 km of the sea and 25% live within 5 km of a beach because that is what they want to do. It is a prime time for Eyre Peninsula towns to take advantage of the 'sea change' phenomenon and boost the population of their local communities thereby ensuring that local hospitals, schools and businesses can survive.

I also ask that the mining potential of the region encompassed by the Gawler Craton mineralisation be taken into account. I have always considered that mining would help save our railway and communities on Eyre Peninsula. Certainly more coastal housing and facilities will be needed and air transport may even be improved because of mining. An increased commercial use of our coast must be planned.

**Page 8: One purpose of this Strategy is to provide a framework for a consistent planning approach across the region that provides certainty and clarity to the community and development industry.**

The draft Eyre Peninsula Coastal Development Strategy as presented does not have specific guide lines and only addresses issues generically. It is therefore subject to individual interpretation and could result in quite draconian regulations being introduced.

It should be noted that the so called Accelerated Freeholding of coastal properties by this Government has been one example of compulsory acquisition without compensation that should not be repeated.

**Page 11: Native Vegetation Council**

A point should be added that the Native Vegetation Council must support District Councils who, as part of their forward planning, retained native vegetation in areas kept for 'deferred development' and not penalise them i.e. District Council of Lower Eyre Peninsula and Coffin Bay developments and the City of Port Lincoln and the Lukin Development. Another extreme example of lack of support for past good planning is Councils being told their cemeteries cannot be extended into the areas set aside until required as native vegetation has to be removed and that cemetery car parks should be used instead.

**Page 13: Investigations and Community Involvement -**

**Economic Development** - Strong support for mining should be included.

**Physical Infrastructure – Adequate infrastructure (roads, power, water and waste) is required to underpin population growth and economic development.** - Rail and air transport should be included.

The note stating *the economics of wind power suggest other areas in SA may be more viable at this stage* should be deleted.

Wind farm developments in more densely populated areas in the State are encountering mounting adverse pressure from local residents while Eyre Peninsula has many areas where wind farms would not be subject to these problems. In fact wind farm leases are proving to be a significant alternative source of income for landowners. Eyre Peninsula has a number of opportunities for developing further wind power sites and the advent of mining will bring more pressure for upgraded and interconnected regulated power lines.

**Page 13: Physical Infrastructure – Adequate infrastructure (roads, power, water and waste) is required to underpin population growth and economic development.**

For sometime I have been voicing concerns about the urgent need to upgrade public infrastructure on Eyre Peninsula, particularly power and water. The Strategic Infrastructure Plan and Strategies relevant to Eyre Peninsula (page 6) include undertaking electricity network transmission and substation upgrades and evaluating options to augment water supplies by desalination to support growth.

Currently the lack of an adequate water and electricity supply has resulted in water augmentation fees being charged and many towns suffer regular power fluctuations and outages. Unless the State Government, SA Water, Origin Energy and ETSA Utilities commit more funding for infrastructure none of the suggested upgrades or infrastructure will be adequate and development will be stifled. In relation to SA Water, it appears that as a result of current state government taxing policy, water augmentation fees go to general revenue through taxation and dividends.

**Page 14: Guiding Principles – Only one of the 'Nine Guiding Principles' (Number 3) refers to enhancing opportunities for growth of new and existing economic activities, to assist in the creation of regional wealth.**

The strong emphasis on protection implies there will be another raft of restrictive controls put in place. The Native Vegetation Council and the Coast Protection Board already have restrictive policies and

regulations protecting coastal vegetation and areas and it is concerning that more restrictions and ‘red tape’ are going to be introduced. Currently there are incidences on Eyre Peninsula where the Native Vegetation Council and legislation are severely restricting development and in some cases has completely stopped major projects.

For small regional coastal towns to retain essential services such as schools, acute care hospitals, banks, etc it is important they continue to prosper and grow. Development Plans already provide controls for structured and orderly development and Planning SA produces templates for Councils to use so that there is consistency across the State. I am concerned that limiting and restricting development will result in higher property and future development costs. Having to provide a detailed assessment of the environmental, landscape, cultural, social and economic impacts or benefits is a long and expensive task and development costs will rise as a result of the proposed requirements.

***Page 14: Guiding Principle 4 – Recognising the interdependence between land and sea.....***

The Strategy should also acknowledge the interdependence between the sea and coast and inland development. Mining needs good port and harbour facilities to take the minerals out for processing or export. Without such coastal facilities inland mining development will not proceed.

***Page 15 Guiding Principles 8 - Facilitating appropriate public access to the coast and Page 23 Objectives – Planned and managed public access to the coast:***

The provision of suitable public access, particularly in popular coastal precincts that are privately owned was an issue raised at the community forums. I have been contacted by land owners about their concerns about sanctioning access to popular beaches across their land and the general public dismayed about the increasing lack of access to popular local beaches as long term ‘traditional’ access arrangements over private land are removed.

It will become increasingly important to facilitate public access and provide facilities on the coast, particularly if people are not going to be able to afford or be able to live close to the sea. The Perpetual Lease Accelerated Freeholding program has resulted in large tracts of coastal property being annexed for coastal reserves which will further limit access and development. One of the reasons for the State Government acquiring this coastal land was because it could be affected by rising sea levels and a 100 year flood. However, farmers who owned much of this land in many cases for generations have had a valuable asset taken from them with no compensation.

***Page 18: Strategies: Permit disturbance of native vegetation and natural coastal habitats only where a net environmental gain can be achieved.***

I have already experienced departmental extremism in the interpretation of ‘a net environmental gain’ when trying to get the Cathedral Rock Wind Farm approvals through. I was told that despite the more than 1 for 10 exchange of native vegetation this was not enough because “we already have that.” I understood this to mean that as the exchanged freehold land was covered with native vegetation it could not be cleared under the Act anyway. The land had not been cleared because the farmer concerned was a conservationist himself however he favoured wind energy and could use the fee paid by the company. I don’t think the act was made to be interpreted as it was, which was a last ditch attempt to stop a significant project that now provides Eyre Peninsula with clean energy instead of coal power from Port Augusta.

***Page 20: Actions – Land based hatcheries may also be appropriate where they are dependent on obtaining sea water, have minimal environmental impact, and have broad and large scale economic benefits.***

It should be noted that it is crucial that pump stations for land based aquaculture are located at sea level as water must be pumped up. It is not possible to suck it up as indicated in the diagram on Page 17 which shows the pump station located above the coastal zone.

The investigations and community involvement (Page 13) indicated there is strong support for the continued growth of the aquaculture industries.

This 'Action' would appear to add more hurdles for land based aquaculture to overcome before commencing. Aquaculture industries requiring sea water are already subject to numerous PIRSA, EPA and environmental requirements, in addition to complying with development and planning obligations. Aquaculture development costs have proven to be substantial and adding extra requirements such as justification of their economic benefit and proof that they will have broad and large scale economic benefits will only lengthen the approval process time frame and inflate costs. Innovators and investors who are prepared to take the risk of initiating new ventures that create wealth and jobs, particularly in remote regions, should be encouraged not hindered.

Future port and harbour facilities for mining, marinas for fishing and housing developments will also impact on the coastal zone and should be included now as part of this strategy.

***Page 20: State Government and councils to identify funding for improved data and information to improve planning responsiveness to coastal issues.***

What this actually means is very nebulous and would appear to have a component of cost shifting and added responsibility to local government. Is this something that should remain Federal and State government responsibility and not become another financial burden for local councils?

***Page 20: Actions – Development within Coastal Zones should be limited to small-scale public facilities, boardwalks and viewing platforms, small boat ramps, nature based and/or eco-tourism development where it can be demonstrated that the impacts on the natural environment are minimal and there is broad economic or community benefit.***

This statement is in contrast to Page 23 where the *Overview* states that growth in tourism and recreation requires improved access to services and facilities, including marinas and recreational trails.

Tourism injects a significant amount of money into the area and the State's economy. The community consultation indicated that there was strong support for the continued growth of tourism and as well as providing suitable public access and recreational boating facilities.

Provision for the unexpected must be made to allow exceptions. For example, mining processing and export facilities, large sea water desalination and port and harbour developments could all require clearing of native vegetation.

***Page 20: Acid Sulphate Soils:***

The map and data obtained from the Department of Water, Land, Biodiversity and Conservation and other sources indicated that there has been limited field inspection and therefore limited recording of potential acid sulphate soil sites. If acid sulphate soils are to be factored into coastal planning and developers obliged to take counteractive measures it is essential that accurate and readily accessible data is available. Insufficient or accurate data may stop or delay projects and in some instances require expensive remedial measures that may not be necessary.

***Page 22: Planning SA to monitor population growth and housing demand within existing coastal towns and settlements to support a proactive approach to housing development, including the identification of potential new coastal settlements where environmental impacts can be managed.***

I question the value of Planning SA of monitoring population growth and housing demand within existing coastal towns and settlement to support a proactive approach to housing development. Will the Government provide financial support or assistance for development? Will they ensure SA Water fulfils its charter to provide water to all the people of the State and not just siphon approx \$200 million per year into general revenue? Or will Planning SA effectively reduce development in regional areas.

**A Strategy outlined on Page 21 states that *new coastal settlements 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.***

In whose opinion? Is it the opinion of the local person who relies on having a hospital with a doctor within 100 kms and a school for their children or is it the city person who wants to feel good? It must be the former.

Will new subdivisions within existing coastal towns be supported or not? Asking small developers to produce an Environmental Impact Statement and an Economic Impact Statement for what in the main will only be minor housing subdivision is ludicrous.

**Page 22: Strategies – *Limit the linear expansion of rural living allotments directly facing the coast.***

Linear development should not be precluded. There are instances where large tracts of coastal land cannot or should not be developed while there are areas that would be suitable for lineal development.

The statement on page 4 that unplanned growth may increase property values beyond the affordability of local people can be rebutted by the argument that limiting land for development also drives up property prices. People who are not local add significantly to an economy and more of these can be expected as mining development occurs in the region and we need them. We don't want fly in/fly out positions between major cities and regional mines as this provides little local economic benefit. It is better to accommodate families close by if possible.

**Page 23: Overview – *Access to high quality roads* .....**

What is the definition or criteria for a 'high quality road'? Approximately only 7% of Eyre Peninsula roads are sealed and local government is continually seeking sources of funding to assist with sealing roads. The Roads to Recovery funding has helped some of the upgrading backlog however unless there is significant assistance from the State Government I do not believe sealed roads are a feasible option.

**Page 23: Overview – *Growth in tourism and recreation.***

Projections for tourism development in the Strategy are all nature-based and/or ecotourism based which I do not disagree with. However it should not be the only view or prediction for tourism on Eyre Peninsula. There are areas in the region that already provide and/or can offer other attractions and reasons for visitors to come and stay in the region.

SATC records indicate that visitor numbers for fishing purposes represent more than 50% of tourists or visitors to the region. Surfing, sailing and food based visits will become more popular, particularly when the ferry between Wallaroo and Lucky Bay makes the region more accessible, and mining commences across the region.

**Page 25: Overview - *Water management and availability is also a significant issue for many forms of primary production in the region and it is important that the resource is managed within sustainable limits.***

Water is also central for continued residential development. While it is imperative that the resource is managed it should not form part of the reason why development should be restricted. There are alternative methods of providing water such as sea water desalination that are becoming increasingly viable and increased populations in coastal towns will provided impetus for this to happen.

SA Water has to be required to fulfil its charter to provide water for all the people of the State and not be milked of funds by successive governments. Putting 95% of net profits into general revenue while forcing people to reduce consumption and buy tanks is not a successful way to go. Households would be

willing to pay the small additional cost needed to supply ample desalinated water. \$4 per week would buy 10,000 kilolitres at \$2 per kilolitre per year.

***Page 26: Actions- State Government and councils, in consultation with key stakeholders, to identify new strategic locations for land based and off-shore aquaculture development and support services.***

***Strategies – Promote the establishment of industry clusters in townships that support aquaculture development.***

Limiting coastal aquaculture only to clusters in some instances may prove to be very restrictive. Are strategic locations going to be designated or will there be a 'working document' and each application judged on merit? Defining appropriate locations for aquaculture development presumes that public servants are better able to assess the relatively few suitable sites than the potential investors and would limit potential opportunities as new aquaculture industries and sites are continuing to emerge. Coastal townships are a fair distance apart in some areas of Eyre Peninsula and there may be ideal sites where an aquaculture development, not been thought of yet, would be suitable.

I ask local governments and Planning SA to carefully consider the restrictions and limitations that appear to be implied in the Eyre Peninsula Coastal Development Strategy and the long term development connotations for local communities that may arise if this document is implemented without amendment or before a more defined development strategy is produced for comment. For instance on Page 18 the main hazards relevant to Eyre Peninsula region include sea flooding yet on page 5 it states that the 1650 km coastline is dominated by rocky limestone cliff and only 15 per cent is comprised of bays and embayments. It must be recognised that the interpretation of the document by other departmental offices such as Coastal Protection and Native Vegetation may be used in a much more aggressive and intrusive way than was ever intended.

Yours sincerely,



**Mrs. Liz Penfold MP**

Shadow Minister for Regional Development,  
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Cc All Councils, Shadow Minister for Urban Development & Planning D Ridgeway, Shadow Minister for Local Government M Goldsworthy, ERDB