

Australian Walking Company

Wilderness Trail Accommodation – Cape Du Couedic

Flinders Chase National Park – CR 6716/336

520/L007/18 – Deferred Item

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Village Square

OVERVIEW

Application No	520/L007/18
Unique ID/KNET ID	2018/22407/01 ID 3698
Applicant	Australian Walking Company C/- Fyfe
Proposal	Wilderness Trail Accommodation – Cape Du Couedic
Subject Land	Flinders Chase National Park – CR 6716/336
Zone/Policy Area	Conservation Zone
Relevant Authority	SCAP – Development Regulations. Sch 10, 18 – Kangaroo Island
Lodgement Date	19/11/2018
Council	Kangaroo Island Council
Development Plan	Kangaroo Island Council Consolidated – 17 September 2015
Type of Development	Merit
Public Notification	Category 1
Representations	N/A
Referral Agencies	Heritage SA, CPB, KI NRMB, CFS
Report Author	Jeremy Wood
RECOMMENDATION	Development Plan Consent subject to conditions

EXECUTIVE SUMMARY

This application is one of three development applications lodged for tourist accommodation within the Flinders Chase National Park, in association with the Kangaroo Island Wilderness Trail (KIWT).

The applicant, Australian Walking Company (AWC), seeks development plan consent for internal alterations to the existing State Heritage Cape du Couedic Lighthouse Keepers' Cottages, and the construction of a common building in the form of a pavilion and associated lookout platforms.

On 23 May 2019 the Panel resolved to defer its decision of this application to enable:

- Further consideration of the site features and context; and
- Request additional information from the applicant.

The applicant has responded by acknowledging there will not be any new trails at Cape Du Couedic. In addition the applicant has clarified this proposal does not necessitate the inclusion of a refuge building unlike at Sandy Creek and Sanderson Bay. The CFS has confirmed this in their advice and as such Condition 6 is superfluous. Accordingly it has been removed from the recommendation.

The details submitted are considered to sufficiently address the questions posed by the SCAP.

The application is a merit, Category 1 form of development and was subject to referrals to Heritage SA, the Coast Protection Board, the Country Fire Service, the Kangaroo Island Natural Resource Management Board, and the Kangaroo Island Council.

The proposal has been assessed and is considered worthy of development plan consent, subject to conditions.

1. CONCLUSION

The Development Plan envisages a range of tourist accommodation options to meet the varied needs of visitors to the Island. The proposed development seeks to upgrade existing tourist accommodation to ensure its continued use as a valued State heritage place and to provide additional facilities and amenities for guests. The proposed internal alterations and construction of a new outdoor common area and associated viewing platforms has received the support of Heritage SA.

The applicant has negotiated suitable outcomes with the SA CFS, with the SA CFS advising that it has no objection to the proposal subject to conditions. The clearance of native vegetation is being considered through a separate application to the NVC. Kangaroo Island Council is supportive of the application, describing it as 'an exciting opportunity for tourism growth and diversity on Kangaroo Island'.

On balance it is considered that the proposed development warrants planning consent as it has been sensitively designed, will provide a wider range of tourist accommodation options on the Island, and is generally consistent with the relevant provisions of the Kangaroo Island Development Plan.

2. RECOMMENDATION

It is recommended that the State Commission Assessment Panel:

- 1) RESOLVE that the proposed development is NOT seriously at variance with the policies in the Development Plan.
- 2) RESOLVE that the State Commission Assessment Panel is satisfied that the proposal generally accords with the related Objectives and Principles of Development Control of the Kangaroo Island Development Plan.
- 3) RESOLVE to grant Development Plan Consent to the proposal by Australian Walking Company for tourist accommodation at Cape Du Couedic subject to the following conditions of consent.

PLANNING CONDITIONS

1. The development granted Development Plan Consent shall be undertaken and completed in accordance with the stamped plans and documentation, except where varied by conditions below (if any).

Reason: to ensure the development is undertaken in accordance with the approved plans.

2. All trade waste and other rubbish shall be stored in covered containers prior to removal and shall be kept screened from public view.

Reason: To avoid impact on the surrounding natural environment.

3. All external finishes shall have surfaces which are of a low light reflective nature and be of muted natural colours.

Reason: To avoid impact on the surrounding natural environment.

Heritage SA (recommended condition)

4. Final roof design details of the new 'Commons' building shall be mutually agreed and then matching documentation provided, to the satisfaction of the State Commission Assessment Panel in consultation with the Department for Environment and Water.

Reason: To ensure the design intent is appropriately detailed leading to a well finished result.

CFS (directed conditions)

5. The applicant & operators shall develop an Operational Management Plan which will ensure that staff and guests alike are not placed at any unnecessary risk through restricting operations and evacuating from the site prior to elevated fire conditions.
6. Siting (of structures) shall be away from existing elevated fuel structures.
7. Minister's Code 2009 "Undertaking development in Bushfire Protection Areas" (as amended October 2012) Part 2.3.4.1 prescribes the mandatory provision of a dedicated and accessible water supply to be made available at all times for fire-fighting.

Ministers Specification SA78 provides the technical details of the dedicated water supply for bushfire fighting for the bushfire zone. The dedicated bushfire fighting water supply shall also incorporate the installation of a pumping system, pipe-work and fire-fighting hose(s) in accordance with Minister's Specification SA78 as follows:

- A minimum supply of 22,000 litres of water shall be available at all times for bushfire fighting purposes.
- The water storage facility (and any support structure) shall be constructed of non-combustible material.
- The dedicated fire-fighting water supply shall be pressurised by a pump that has –
 - i. A minimum inlet diameter of 38mm, AND
 - ii. Is powered by a petrol or diesel engine with a power rating of at least 3.7kW (5hp), OR
 - iii. A pumping system that operates independently of mains electricity and is capable of pressurising the water for fire-fighting purposes.
- The dedicated fire-fighting water supply pump shall be located at or adjacent to the habitable building to ensure occupants safety when operating the pump during a bushfire. An 'Operations Instruction Procedure' shall be located with the pump control panel.
- The fire-fighting pump and any flexible connections to the water supply shall be protected by a non-combustible cover that allows adequate air ventilation for efficient pump operation.
- All bushfire fighting water pipes and connections between the water storage facility and a pump shall be no smaller in diameter than the diameter of the pump inlet.
- All non-metal water supply pipes for bushfire fighting purposes (other than flexible connections and hoses for fire-fighting) shall be buried below ground to a minimum depth of 300mm with no non-metal parts above ground level.
- A fire-fighting hose (or hoses) shall be located so that all parts of the building are within reach of the nozzle end of the hose and if more than one hose is required they should be positioned to provide maximum coverage of the building and surrounds (i.e. at opposite ends of the habitable building).
- All fire-fighting hoses shall be capable of withstanding the pressures of the supplied water.
- All fire-fighting hoses shall be of reinforced construction manufactured in accordance with AS 2620 or AS 1221.
- All fire-fighting hoses shall have a minimum nominal internal diameter of 18mm and a maximum length of 36 metres.

- All fire-fighting hoses shall have an adjustable metal nozzle, or an adjustable PVC nozzle manufactured in accordance with AS 1221.
8. Minister's Code 2009 "Undertaking development in Bushfire Protection Areas" (as amended October 2012) Part 2.3.5 mandates that landscaping shall include Bushfire Protection features that will prevent or inhibit the spread of bushfire and minimise the risk to life and/or damage to buildings and property.
- A vegetation management zone (VMZ) shall be established and maintained within 20 metres of the refuge building as follows:
 - The number of trees and understorey plants existing and to be established within the VMZ shall be reduced and maintained such that when considered overall a maximum coverage of 50% is attained, and so that the leaf area of shrubs is not continuous. Careful selection of the vegetation will permit the 'clumping' of shrubs where desirable, for diversity, and privacy and yet achieve the 'overall maximum coverage of 50%'.
 - No understorey vegetation within 2 metre of the habitable building (understorey is defined as plants and bushes up to 2 metres in height).
 - The VMZ shall be maintained to be free of accumulated dead vegetation.
9. The applicant & operators shall formulate, practice and maintain an Emergency Response Plan that addresses the extreme risk associated this remote location presents, incorporating the following:
- Emergency Communication
 - Evacuation options and risk mitigation measures as a result of the reduced access proposed and the increased evacuation times that may be experienced
 - Emergency response training & regular drills
 - Operating hours and restrictions on days of extreme weather or bushfire events

Reason: to ensure appropriate safety requirements and hazard reduction practices are adopted during the construction and operational phases of the development.

ADVISORY NOTES

- a. This Development Plan Consent will expire after 12 months from the date of this Notification, unless final Development Approval from Council has been received within that period or this Consent has been extended by the State Commission Assessment Panel.
- b. The applicant is also advised that any act or work authorised or required by this Notification must be substantially commenced within 1 year of the final Development Approval issued by Council and substantially completed within 3 years of the date of final Development Approval issued by Council, unless that Development Approval is extended by the Council.
- c. The applicant has a right of appeal against the conditions which have been imposed on this Development Plan Consent. Such an appeal must be lodged at the Environment, Resources and Development Court within two months from the day of receiving this notice or such longer time as the Court may allow. The applicant is asked to contact the Court if wishing to appeal. The Court is located in the Sir Samuel Way Building, Victoria Square, Adelaide, (telephone number 8204 0289).
- d. Any changes to the proposal for which planning consent is sought or granted may give rise to heritage impacts requiring further consultation with the Department for Environment and Water, or an additional referral to the Minister for Environment and Water. Such changes would include for example

- (a) an application to vary the planning consent, or
 - (b) Building Rules documentation that incorporates differences from the proposal as documented in the planning application.
- e. The applicant is advised of the following requirements of the Heritage Places Act 1993.
- (a) If an archaeological artefact believed to be of heritage significance is encountered during excavation works, disturbance in the vicinity shall cease and the SA Heritage Council shall be notified.
 - (b) Where it is known in advance (or there is reasonable cause to suspect) that significant archaeological artefacts may be encountered, a permit is required prior to commencing excavation works. For further information, contact the Department for Environment and Water.
- f. The applicant is advised that any native vegetation on the site is protected under the Native Vegetation Act 1991 and Native Vegetation Regulations 2017. Prior to any clearance being undertaken (e.g. for trail networks and "look out" platforms), the applicant should seek Native Vegetation Council approval to do so.
- l. Compliance with the fire protection requirements is not a guarantee the habitable building will not burn, but its intent is to provide a 'measure of protection' from the approach, impact and passing of a bushfire.



Jeremy Wood

**TEAM LEADER, DEVELOPMENT ASSESSMENT
DEVELOPMENT DIVISION
DEPARTMENT OF PLANNING, TRANSPORT and INFRASTRUCTURE**

Australian Walking Company

Wilderness Trail Accommodation – Cape Du Couedic

Flinders Chase National Park – CR 6716/336

520/L007/18

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Village Square

OVERVIEW

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The applicant, Australian Walking Company (AWC), seeks development plan consent for internal alterations to the existing State Heritage Cape du Couedic Lighthouse Keepers' Cottages, and the construction of a common building in the form of a pavilion and associated lookout platforms.

The cottages are currently utilised for tourist accommodation and have been for several decades. The upgraded cottages will provide the second nights' accommodation for walkers taking part in a three day guided tour through the National Park, with the AWC's vision being to provide 3 nights and 3 distinct memories, in which architecture and site-planning marries with Place.

The South Australian Tourism Commission (SATC) has identified a multi-day walking trail as critical for the development of the tourism industry on Kangaroo Island and to compete with nature-based destinations worldwide. The 61 kilometre Kangaroo Island Wilderness Trail (KIWT) has since been developed and to complement and gain leverage from this initiative, the SATC, the Department of Environment and Water (DEW) and National Parks SA are seeking to improve the range of accommodation options and guided walking experiences along the trail.

The applicant has advised that to facilitate this, "an opportunity was presented to the private sector by DEW and SATC to develop exclusive, eco-sensitive accommodation and tours to tourists and an expression of interest process occurred. At the conclusion of this process, the AWC was selected as the preferred commercial tour operator."

The application is a merit, Category 1 form of development and was subject to referrals to Heritage SA, the Coast Protection Board, the Country Fire Service, the Kangaroo Island Natural Resource Management Board, and the Kangaroo Island Council.

The proposal has been assessed and is considered worthy of development plan consent, subject to conditions.

ASSESSMENT REPORT

1. BACKGROUND

1.1 Strategic Context

In 2014 considerable work was undertaken strategically by the Department of Planning, Transport and Infrastructure, including drafting an Addendum to be read in conjunction with the **Kangaroo Island Plan**, January 2011. The addendum replaced certain strategic land use directions to better align with priorities of the Kangaroo Island Futures Authority (KIFA) to provide an overarching framework for economic sustainability. The changes were informed by extensive consultation and significant research commissioned by the KIFA.

The **Kangaroo Island Structure Plan** provides the detail to inform future development opportunities on Kangaroo Island. It also summarises the situation and trends for the Island at 2013. The Structure Plan identifies opportunities for economic development, specifically in relation to tourism and agricultural diversification and value adding. It provides the framework for a sustainable economic future where future development activities retain economic benefits on the Island, balanced with the protection of the Island's natural resources.

A **Sustainable Futures Development Plan Amendment (DPA)** was prepared concurrently to help implement the changes at the local level, through zoning and policies that guide new development and infrastructure proposals. The DPA was endorsed and consolidated into the Development Plan for Kangaroo Island 20 February 2014. This land use policy position remains current.

Together, the changes identified in these three documents provide the land use framework to facilitate improved community resilience and economic longevity of Kangaroo Island.

1.2 Kangaroo Island Wilderness Trail

The 61 kilometre Kangaroo Island Wilderness Trail (KIWT) has been developed and to complement and gain leverage from this initiative, the SATC, the Department of Environment and Water (DEW) and National Parks SA are seeking to improve the range of accommodation options and guided walking experiences along the trail.

People wishing to walk the KIWT currently have several options available to them:

- a self-guided walk using the campgrounds provided (carrying own equipment)
- a self-guided walk using the campgrounds provided and a commercial operator to transport personal equipment from one campground to the next
- engage a commercial tourism operator and either use the campgrounds provided or stay in private accommodation off the trail (**see Figure 1**)

A booking system regulates the number of walkers departing each day. This is to avoid overcrowding, to preserve the wilderness experience for everyone, to reduce environmental impact and to ensure sustainable management of the track and campground facilities.

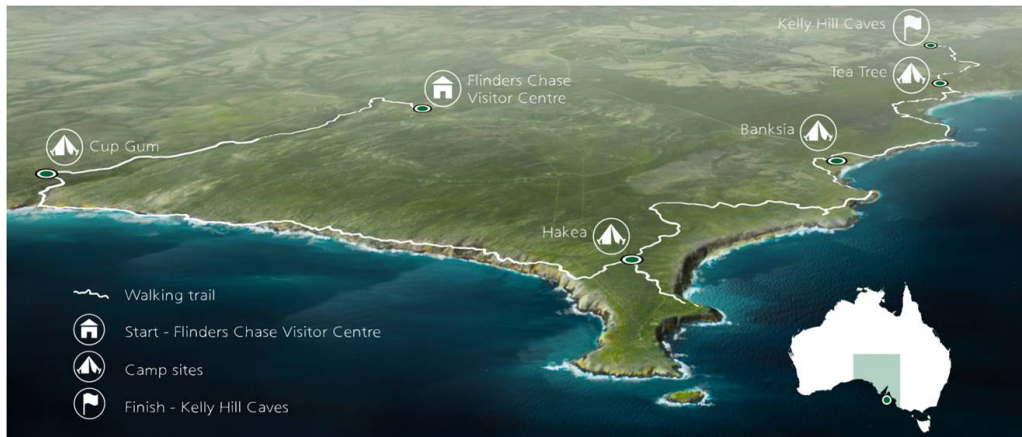


Figure 1 - KIWT Route & Accommodation

1.3 National Parks Management Plan

The subject site is located within a National Park and as such any decision to develop within the Park requires the consent of the custodian of the land, DEW. Key guidance for development within National Parks is often provided by way of Management Plans.

An amendment to the 'Flinders Chase National Park, Kelly Hill Conservation Park, Ravine des Casoars Wilderness Protection Area and Cape Bouguer Wilderness Protection Area Management Plan' (Management Plan) was adopted in 2017 to provide for small scale, ecologically sensitive accommodation within minor development zones and lists the KIWT as a development zone. The location of small scale, low-impact eco huts (or similar) is not restricted to the existing camping nodes within development zones but can be placed anywhere along the trail.

1.4 DEW letter of support

The applicant has provided as part of the application package a letter from the Chief Executive of DEW the proposal aligns with the intent of the Park Management Plan which facilitates the development of small scale ecologically sensitive accommodation for trail walkers.

2. DESCRIPTION OF PROPOSAL

Application details are contained in ATTACHMENT 1 & 2.

This application is for internal alterations to the existing State Heritage Cape du Couedic Lighthouse Keepers' Cottages (3) and construction of a common building in the form of a pavilion 'The Commons'.

The internal alterations comprise:

- Conversion of the smallest rear bedroom in each cottage to a second bathroom;
- Updates to the existing bathroom;
- Updates to the existing kitchen; and
- Internal alterations to the existing store/laundry

The applicant has advised that the existing kitchen sink bench and woodfire cooker will be retained. New fitout and furniture will be contemporary.

Associated external works include:

- Demolition of the existing barbeque shelter;
- Construction of a new contemporary removable and lockable 'commons building' (approx. 63m²) between the existing Parndana and Karatta cottages comprising a kitchen, BBQ facility, fireplace and dining area and storage;
- Associated with the accommodation are discrete observation decks (lookout platforms)

No landscape works are proposed at Cape du Couedic, except for the removal of shrubs located between Karatta and Parndana Lodges to facilitate the siting of 'the Commons'.

Proposed building materials for 'The Commons' will be of lightweight, natural and largely ephemeral materials, seeking to blend in with the lodges:

EXPOSED FRAMING:	MATERIALS
	Australian hardwood/ cypress pine, naturally greyed
	Steel, paint finish to dark tones
	Li-ten weathered (raw) steel
WALLS: EXT LININGS:	
	Li-ten weathered (raw) steel
	Weathertex Natural, nil finish, naturally greyed
ROOFING:	
	Li-ten weathered (raw) steel
	Ampelite 'Wonderglas GC', gel-coated fibreglass, ice clear
SCREENS/ SOFFITS:	
	Li-ten weathered (raw) steel
	Jasper colorbond/ custom orb
	Ampelite 'Wonderglas GC', gel-coated fibreglass, ice clear
	Bush timber battens from road clearing, naturally greyed
WINDOWS/ DOORS:	
	Select Australian hardwood frames, clear oil finish
	Performance glass/ Ampelite 'Wonderglas GC', gel-coated fibreglass, ice clear
	Polished Australian hardwood/ bush timber door furniture
DECKING, SEATS, STEPS, BOARD WALKS, INC FRAMING:	
	Australian hardwood/ cypress pine, naturally greyed
	FRP mesh, black

No external alterations or conservation works are proposed to the cottages. The cottages currently operate as tourist accommodation. The maximum number of guest rooms per cottage is three.

3. SITE AND LOCALITY

3.1 Site Description

The cottages are located within the Flinders Chase National Park with the entire subject land being in excess of 9000 hectares in area. The cottages are located more specifically in the southern most portion of the park on a small peninsular, described as follows:

Lot No	Plan	Street	Suburb	Title Ref.
Piece 55	DP 38340	Cape Du Couedic Road	Flinders Chase	CR 6176/336

The subject land contains three existing cottages, a barbeque shelter and a rainwater tank. The cottages are accessed by private driveway from Cape du Couedic Road. Directly adjacent each cottage is a parking area for two cars.

The surrounding land is covered in native vegetation in the form of Mallee Woodland and 'shrubland'. Views of the cottages are to a large degree obscured from the adjacent road. As per Fyfe's report the landscape itself gently slopes down towards the surrounding coastal cliff with the prevailing downward slope towards the south west.

3.2 Locality

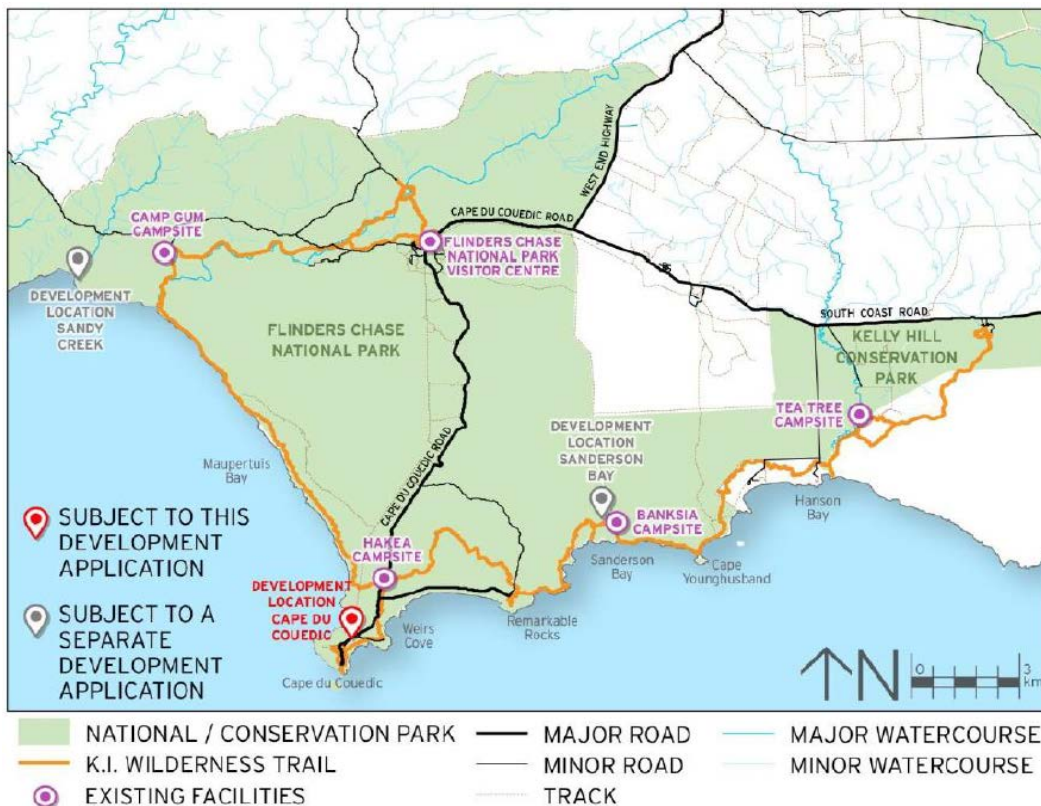


Figure 2 – Site and Location Map – Flinders Chase National Park - Source Fyfe

The locality is typical of a wilderness area with immense areas of untouched vegetation, interrupted only by recreational walking trails, fire access tracks and the rugged coast line.

To the south of the cottages is the Cape du Couedic Lighthouse, and within the immediate/broader locality is Admirals Arch and Fur Seal Lookout with associated public car parks.

The existing cottages are located approximately 17km south of the Flinders Chase Visitor Centre and are serviced by an all-weather public road.

The nearest built form is located over 2 kilometres from the site, at the Hakea Campground to the north.

4. COUNCIL COMMENTS or TECHNICAL ADVICE

4.1 Kangaroo Island Council

Council has reviewed the application detail against relevant provisions of the Kangaroo Island Development Plan (consolidated 17 September 2015) and considers the proposed development to be in reasonable accord with the Plan's intent, including the zone objectives, desired character and envisaged forms of development for the Conservation zone.

Development in the Cape du Couedic appears to be unobjectionable to Council. The addition of the communal hosting building situated between the existing Parndana and Karatta lodges are also fundamentally unobjectionable, however Council feels that its design could be more sympathetic to the heritage value of the lodges themselves rather than being boldly modern by design in stark contrast to the heritage listed lodges.

In summary, Council advises the proposal represents an exciting opportunity for tourism growth and diversity on Kangaroo Island. The development's unique tourist accommodation and experience is well aligned with the Kangaroo Island Development Plans intent to encourage tourism / tourist accommodation development within the Conservation zone.

Council accordingly advises that it has no objection to the proposal and supports the approval of the proposed development.

5. REFERRAL BODY COMMENTS

Referral responses are contained in ATTACHMENT 3.

5.1 Heritage South Australia , DEW (statutory referral)

The Minister for Environment and Water is a mandatory referral in accordance with Section 37 of the *Development Act 1993*, due to it being a development that directly affects a State heritage place or, in the opinion of the relevant authority, materially affects the context within which a State heritage place is situated.

Heritage South Australia has advised that the proposed development is considered to be acceptable for the following reason/s.

- The proposed development consists of the internal alteration of the three original keepers cottages to allow for a dual usage by private and public guests through the year and the construction of a new 'commons' building between two cottages and new observation decks built atop the original stone water tanks.
- The internal alterations provide a new bathroom/toilet in the formerly smallest rear bedroom of each cottage and allows for the installation of a fold-up bed

arrangement in the former front lounge. The new 'commons' room outside is lockable to be used only for private group guests.

- No external conservation works are proposed, and no alterations proposed are to be visible externally either.
- Whilst the new 'commons' outdoor room is contemporary in design the alignment with the original cottages and the enclosure by them allows the cottages to not be diminished in heritage value.
- Additionally the new building is designed to be removable without any damage to the site or the cottages in the future, should that be necessary.
- Heritage South Australia has visited the site in June 2018 and been involved in preliminary design discussions.

Heritage recommends 1 condition and 6 notes to be applied to any planning consent.

5.2 Coast Protection Board (statutory referral)

The Board advises that it is unsure if appropriate investigations have been carried out to determine the alignment and design of trail networks associated with this application. However, the Board is satisfied that DEW can facilitate trail networks in Flinders Chase National Park to ensure impacts on coastal biodiversity are minimised. Accordingly, the Board will not request further information nor comment on coastal biodiversity impacts with this application.

The Coast Protection Board advises it has no objections to the proposed development and recommends notes to be applied to any planning consent.

5.3 Kangaroo Island Natural Resource Management (NRM) Board

The Kangaroo Island NRM Board has advised it has no comment to make on the proposed development.

5.4 South Australian Country Fire Service (SA CFS) (statutory referral)

The proposed development is located within an area that is categorised as a HIGH Bushfire Protection Area in the Council Development Plan and therefore required a referral to the SA CFS.

Chronology of events:

- Referral to SA CFS – November 2018
- SA CFS referral response received – January 2019
- Applicant (Fyfe) response to issues raised – March 2019
- SA CFS second referral response received – April 2019

The applicant's has provided a response to the initial SA CFS referral response dated 17 January 2019, in which a number of concerns were raised. SA CFS has reviewed the applicant's second submission (March 2019) and is satisfied that the information provided has addressed the concerns raised in January.

The SA CFS has provided the following advice:

- Response rates in this area may be extended in excess of 45 mins once mobile.

- There is a lack of reticulated water in the area and reliable communication networks to facilitate early warning and evacuation of participants on the trail and in residence within the proposed accommodation.
- Kangaroo Island and in particular Flinders Chase National Park has a history of large, and depending on the weather and environmental conditions, uncontrollable bush fires.
- The SA CFS acknowledges the site has a vegetation management plan in place and nominates a last resort refuge (Admirals Arch). However the overall risk remains and will require mitigation measures to be put in place.
- The SA CFS understands the importance of development of the tourism industry on Kangaroo Island and finding balance between ecotourism and meeting the bushfire provisions. Consideration must be given to the essential bushfire provisions in order to protect the life of potential occupants, and firefighting personnel in the event of a bushfire.

A summary of the outcomes negotiated and proposed by the AWC and accepted by SA CFS is as follows:

- A dedicated firefighting water supply, pumping system, pipe-work and fire-fighting hose(s) in accordance with Ministers Specification SA78 will be provided.
- A vegetation management zone (VMZ) shall be established and maintained within 20 metres of the building.
- The applicant & operators shall formulate, practice and maintain an Emergency Response Plan that addresses the extreme risk associated this remote location presents, incorporating the following:
 - Emergency Communication
 - Evacuation options and risk mitigation measures as a result of the reduced access proposed and the increased evacuation times that may be experienced
 - Emergency response training & regular drills
 - Operating hours and restrictions on days of extreme weather or bushfire events

These outcomes have been adopted as proposed conditions of planning consent to ensure compliance with meeting the bushfire provisions.

5.5 Native Vegetation Council

Although there is no statutory referral required, the application was referred to the NVC to assist in appreciating the potential impact of the proposal on flora and fauna.

NVC raised concerns regarding the proposed new guest access trail alignment which runs largely parallel to, and duplicates an existing access track, albeit beneath an existing powerline.

To gain support, the NVC advised that the proponent would need to justify the need for the new trail alignment and demonstrate that impacts on native vegetation have been avoided or minimised.

Clearance of native vegetation relating to the trail development would be considered under regulation 12(36) – Recreation track.

The applicant subsequently lodged an application in November to clear Native Vegetation, with the matter considered by the Native Vegetation Council on 1 May 2019. Further justification and supporting information has been requested from the applicant before the NV Council can arrive at a decision. The next available meeting is scheduled for July 2019.

The applicant has since advised that this trail is no longer proposed and existing tracks will be used. An updated site plan has been received confirming this.

6. PUBLIC NOTIFICATION

The application is a Category 1 development pursuant to the Kangaroo Island Development Plan.

The Procedural Matters contained within the Zone advise that the following forms of development (except where the development is non-complying) are designated as Category 1:

Tourist accommodation setback a minimum of 100 metres from land within an adjoining allotment used for farming or horticulture.

The subject land is located over 8km from land zoned for primary production. Accordingly no statutory public notification was required.

7. POLICY OVERVIEW

The subject site is within the Conservation Zone as described within the Kangaroo Island Development Plan, consolidated 17 September 2015.

The Development Plan provides guidance with respect to the importance of Kangaroo Island within the State Strategic Setting as follows:

Kangaroo Island Planning and Development Area

Kangaroo Island is one of Australia's largest off-shore islands. Due to its relative isolation from the rest of the State it faces unique economic, environmental and social circumstances, challenges and opportunities.

Economic Activity

Traditionally, the Island's economy has been based on the production of wool, cereals and some beef cattle, while industries that are growing in importance are tourism, aquaculture and forestry. The creation of economic initiatives and employment opportunities, combined with appropriate land use allocation, is sought to establish a robust and sustainable economic climate that contributes to the wellbeing of the local community.

Tourism

Tourism has shown growth over recent years and it is anticipated that tourism numbers will increase in the future. It is of extreme importance that Kangaroo Island Tourism is managed in a manner that ensures that the experiences of visitors continue to match their Kangaroo Island expectations and perceptions.

Tourism to Kangaroo Island has historically been largely dependent on the natural resources of the Island and people's perception of the quality of these resources. The concept of a 'clean and green' image for the Island is a fundamental component of tourism and other industries, and its continuing success will be dependent on a well-managed natural environment.

A range of sustainable tourism facilities, accommodation and products must be developed to suit a range of visitor budgets and experiences. However, tourism development must also consider the impact of increasing numbers on the natural environment so as not to diminish the very reason that attracts so many visitors to the Island in the first instance.

With the international growth in the nature-based tourism market, Kangaroo Island is well placed and has the potential to be one of Australia's leading eco-tourism destinations.

It is expected that the Island will continue to develop as a pre-eminent sustainable, nature-based tourism destination, but there is also a need to provide opportunities in other tourism markets around the themes of outdoor adventure and leisure activities, the coast, niche food and wine products, heritage and culture. These markets should add depth to the Island's appeal as a visitor destination and encourage longer stays.

Environment and Resources

The environment of Kangaroo Island is characterised by extensive areas of National Park and Conservation Parks, accounting for nearly 30 per cent of the Island. Kangaroo Island has:

- *spectacular coastal features*
- *clean beaches*
- *freshwater streams*
- *unspoilt natural settings*
- *a small resident population*
- *a diversity of native fauna and flora (including rare and endangered species)*
- *a rare seal colony*
- *no rabbits or foxes; and is relatively pollution free with contamination free conditions.*

The Island has a visually appealing landscape with a mix of farm pasture and natural vegetation.

Kangaroo Island offers an unspoilt Australian nature, wildlife and rural experience with the distinctive difference of an island setting. Opportunities to see Australian wildlife (including rare species) in natural habitats, the spectacular coastlines, bush landscapes and the mystique of the Island's isolation, small population and heritage, make Kangaroo Island a compelling travel destination for local, national and international visitors.

The ongoing management of the environment is required to ensure the protection of the Island's unique natural qualities and to maintain its reputation as a specialist tourist destination of national and world wide significance.

Relevant planning policies (Zone and Council Wide) are contained in Appendix One, and are summarised below.

7.1 Conservation Zone

The Conservation Zone contains areas of National, Conservation and Marine Parks and Wilderness Protection Areas, to provide representative samples of the countryside and shoreline with the objective of conserving and enhancing the natural environment and natural ecological processes for their historic, scientific, landscape, faunal habitat, biodiversity and cultural values.

Facilities for the use of visitors including picnic areas, shelters, huts / bothies, camp sites, toilets, and similar public amenities as well as various forms of low-key, **short stay tourist accommodation such as semi-permanent tents and lodges are anticipated provided they are appropriately sited and designed in a manner that is subservient to the natural and coastal environment and adverse impact on natural features, landscapes, habitats and cultural assets is minimised** (the author's emphasis).

Opportunities for the public to experience and appreciate the significance of the native vegetation and original remnant natural habitat of the area through low-impact recreational activities and interpretive facilities are provided.

The zone also speaks of land division enabling security of tenure for existing lawfully erected dwellings on Crown land, or land owned by the Crown or a Minister of the Crown.

7.2 Council Wide

Relevant Council Wide policy provides guidance regarding appropriate design and built form, environmental, heritage conservation, native vegetation, and bushfire considerations among others.

New buildings should have access to natural light, provide energy efficiencies and minimise visual bulk through architectural composition and judicious use of materials. They should also be designed to reduce the impact of bushfire risk through design and critical siting. Emphasis is placed on minimising impacts of new development on the loss and disturbance of native flora and fauna and its' compatibility with the environment in which it sits and preservation of high landscape and amenity value.

8. PLANNING ASSESSMENT

The application has been assessed against the relevant provisions of the Kangaroo Island Council Development Plan, Consolidated 17 September 2015.

No assessment has been made against the Management Plan as that document is administered by the DEW and whilst important for the management of the Park, is not recognised for the purposes of determining land use suitability under the *Development Act, 1993*.

Context

Development should continue to be limited in natural coastal, marine and estuarine areas in areas of high conservation landscape or environmental significance to ensure that the environmental values of the island are preserved and enhanced.

However, to meet an increasing international demand for special tourism experiences that KI is well placed to provide, there needs to be a recognition that in limited circumstances tourism development should be allowed if it meets environmental, social and amenity criteria and is consistent with the strategic intent of the key state and federal tourism policies and plans.

To meet a range of accommodation and tourism experience needs, land use and development policy requires well designed accommodation for tourism that does not detract from scenic and landscape value of a location. In addition, it envisages a limited number of accommodation styles in scenic and landscape areas, located and designed such that scale, height, design and siting is respectful of and does not detract from views of the rural, natural or wilderness landscape, of the ocean and coastline, or important elements of the natural landscape eg native vegetation cover, coastal features, animal habitat.

The development plan provides a basis for tourism accommodation of varying intensities to be considered in coastal and rural areas and areas of high conservation significance provided it meets criteria designed to minimise visual and amenity impact and interface issues with activities on adjacent land, and avoids environmental impacts. Matters such as vegetation clearance and coastal protection are still integral considerations to site suitability. Importantly the Development Plan has established a clear hierarchy of environmental areas to be protected from or used for such development.

The Proposal

To restate, a multi-day walking trail was identified by SATC for the tourism industry on Kangaroo Island and as a result the 61 kilometre Kangaroo Wilderness Trail was developed. In support and ancillary to the trail, exclusive eco-sensitive accommodation and tours to tourists was proposed. The Australian Walking Company (AWC) was the commercial operator chosen by DEW and SATC to develop the accommodation and bush walking experience. The focus being on the promotion of nature-based tourism opportunities in SA's National Parks to increase tourism and provide for a range of eco-sensitive accommodation styles.

The application before the Panel is for one style of tourist accommodation, albeit fundamentally established, which will cater for a relatively broad spectrum of tourists. The improvements proposed through this application are intended to enhance the current offering at Cape Du Coediac.

8.1 Land Use and Character

In terms of land use, the cottages are currently used for tourist accommodation as stated previously and therefore, no change in land use is proposed. The proposed refurbishment to the heritage cottages will not increase the number of guest rooms available on the site.

Council Wide provisions within the Development Plan call for environmentally sustainable and innovative tourism development (Objective 1), tourism development that protects areas of exceptional natural value, allows for appropriate levels of visitation, and demonstrates a high quality environmental analysis and design response which enhances environmental values (Objective 4), increased opportunities for visitors to stay overnight (Objective 7) and tourism development having a functional or locational link with its natural, cultural or historical setting (PDC 1). The proposal under consideration demonstrates these qualities.

The ongoing use of the heritage buildings provides a unique experience for guests and generates a funding stream that may assist with their ongoing upkeep and conservation.

This accords with Tourism Development Objective 2, which seeks tourism development that assists in the conservation, interpretation and public appreciation of significant natural and cultural features including State or local heritage places.

8.2 Design and Appearance

All improvements to the three cottages are internal and considered acceptable.

The proposed common room is described as a communal building in the form of a pavilion that will be enclosed on three sides. It will include a kitchen and a lounge area which can be enclosed on the fourth remaining side when not in use. Along the northern side of the building will be a verandah covering a barbeque, fireplace and outdoor dining area.

This building will be positioned between the three cottages, as such it is effectively shielded and will not unreasonably impact the landscape or coastal views.

A more important consideration is the likely impact the new common building may have on the heritage place. Heritage Places Objective 1 frames this question, in that it seeks the conservation of State and local heritage places, with Heritage Places Objective 3 requiring conservation of the setting of State and local heritage places.

8.3 Heritage

The three cottages and surrounds are State listed items and as such, the potential impact on those items has been assessed by Heritage SA. Heritage SA has advised that the proposed development is considered acceptable subject to conditions and advisory notes.

Heritage Places Objective 2 seeks the continued use, or adaptive re-use of State and local heritage places that supports the conservation of their cultural significance. The ongoing use of the cottages for tourist accommodation is in accordance with this Objective.

8.4 Access and Parking

The proposal is currently serviced by a private road from Cape Du Couedic Road. No changes to the existing parking and access arrangements are proposed or required.

The proposal satisfies the relevant provisions of the Development Plan with respect to access and parking, particularly Transport and Access Objective 2 and PDCs 21 and 27.

8.5 Environmental Factors

8.5.1 Biodiversity and Native Vegetation

Council Wide provision PDC 27 seeks that development retains existing areas of native vegetation and where possible contributes to revegetation using locally indigenous plant species.

The proposal has been designed to create only a 'light touch' on the natural landscape to minimise disturbance. This will be achieved by way of site selection, the footing system proposed, the nature and location of access trails, and linking paths (being limited in width and on less sensitive land). Commentary from the Native Vegetation Council suggests that the applicant has more work to do to convince them that the level and location of clearance sought is supportable. The outcome of that process, under the *Native Vegetation Act*, is separate to the planning process.

8.5.2 Infrastructure Requirements

The existing infrastructure onsite will require some minor changes to accommodate the additional structures. The applicant advises that these works will be limited to connecting the proposed kitchen into the existing waste water system and installing a swale adjacent the new building to prevent rainwater from the roof catchment area from affecting the adjacent building.

No significant changes to either systems are proposed and stormwater will be managed in a manner that does not detrimentally impact the existing buildings or surrounds.

A waste water application will need to be submitted to the Kangaroo Island Council for approval.

8.6 Bushfire

The existing cottages are located approximately 17km south of the Flinders Chase Visitor Centre and are serviced by an all-weather public road.

SA CFS acknowledges the existing access road satisfies the relevant PDC and Minister's Code to provide safe and convenient access for public and fire fighting vehicles in the event of an emergency.

As the land use is already in existence it is acknowledged that there are safety measures in place to minimise and mitigate the impact of fire. Notwithstanding this the SA CFS has directed a series of conditions to be applied that reflect current requirements.

It is considered that Development Plan Objectives and Principles of Development Control for Hazards (Bushfire) will be met:

Objectives: 1, 2, 3, and 8

Principles of Development Control: 1 (a), 1 (b), 2, 6, 7, 8 (a-e), 9 (a-c), and 11.

9. CONCLUSION

The Development Plan envisages a range of tourist accommodation options to meet the varied needs of visitors to the Island. The proposed development seeks to upgrade existing tourist accommodation to ensure its continued use as a valued State heritage place and to provide additional facilities and amenities for guests. The proposed internal alterations and construction of a new outdoor common area and associated viewing platforms has received the support of Heritage SA.

The applicant has negotiated suitable outcomes with the SA CFS, with the SA CFS advising that it has no objection to the proposal subject to conditions. The clearance of native vegetation is being considered through a separate application to the NVC. Kangaroo Island Council is supportive of the application, describing it as 'an exciting opportunity for tourism growth and diversity on Kangaroo Island'.

On balance it is considered that the proposed development warrants planning consent as it has been sensitively designed, will provide a wider range of tourist accommodation options on the Island, and is generally consistent with the relevant provisions of the Kangaroo Island Development Plan.

10. RECOMMENDATION

It is recommended that the State Commission Assessment Panel:

- 1) RESOLVE that the proposed development is NOT seriously at variance with the policies in the Development Plan.
- 2) RESOLVE that the State Commission Assessment Panel is satisfied that the proposal generally accords with the related Objectives and Principles of Development Control of the Kangaroo Island Development Plan.
- 3) RESOLVE to grant Development Plan Consent to the proposal by Australian Walking Company for tourist accommodation at Cape Du Couedic subject to the following conditions of consent.

PLANNING CONDITIONS

1. The development granted Development Plan Consent shall be undertaken and completed in accordance with the stamped plans and documentation, except where varied by conditions below (if any).

Reason: to ensure the development is undertaken in accordance with the approved plans.

2. All trade waste and other rubbish shall be stored in covered containers prior to removal and shall be kept screened from public view.

Reason: To avoid impact on the surrounding natural environment.

3. All external finishes shall have surfaces which are of a low light reflective nature and be of muted natural colours.

Reason: To avoid impact on the surrounding natural environment.

Heritage SA (recommended condition)

4. Final roof design details of the new 'Commons' building shall be mutually agreed and then matching documentation provided, to the satisfaction of the State Commission Assessment Panel in consultation with the Department for Environment and Water.

Reason: To ensure the design intent is appropriately detailed leading to a well finished result.

CFS (directed conditions)

5. The applicant & operators shall develop an Operational Management Plan which will ensure that staff and guests alike are not placed at any unnecessary risk through restricting operations and evacuating from the site prior to elevated fire conditions.
6. Design and Construction of the proposed refuge building shall be in accordance with Community Bushfire Refuges 2014, as published by ABCB and the Fire Services Commissioner Victoria (see Appendix A); and the NCC Part 3.7 "FIRE SAFETY" Australian Standard TM3959 (AS3959) "Construction of Buildings in Bushfire Prone Areas".
7. Siting (of structures) shall be away from existing elevated fuel structures.
8. Minister's Code 2009 "Undertaking development in Bushfire Protection Areas" (as amended October 2012) Part 2.3.4.1 prescribes the mandatory provision of a dedicated and accessible water supply to be made available at all times for fire-fighting.

Ministers Specification SA78 provides the technical details of the dedicated water supply for bushfire fighting for the bushfire zone. The dedicated bushfire fighting water supply shall also incorporate the installation of a pumping system, pipe-work and fire-fighting hose(s) in accordance with Minister's Specification SA78 as follows:

- A minimum supply of 22,000 litres of water shall be available at all times for bushfire fighting purposes.
- The water storage facility (and any support structure) shall be constructed of non-combustible material.
- The dedicated fire-fighting water supply shall be pressurised by a pump that has –
 - i. A minimum inlet diameter of 38mm, AND
 - ii. Is powered by a petrol or diesel engine with a power rating of at least 3.7kW (5hp), OR
 - iii. A pumping system that operates independently of mains electricity and is capable of pressurising the water for fire-fighting purposes.
- The dedicated fire-fighting water supply pump shall be located at or adjacent to the habitable building to ensure occupants safety when operating the pump during a bushfire. An 'Operations Instruction Procedure' shall be located with the pump control panel.

- The fire-fighting pump and any flexible connections to the water supply shall be protected by a non-combustible cover that allows adequate air ventilation for efficient pump operation.
 - All bushfire fighting water pipes and connections between the water storage facility and a pump shall be no smaller in diameter than the diameter of the pump inlet.
 - All non-metal water supply pipes for bushfire fighting purposes (other than flexible connections and hoses for fire-fighting) shall be buried below ground to a minimum depth of 300mm with no non-metal parts above ground level.
 - A fire-fighting hose (or hoses) shall be located so that all parts of the building are within reach of the nozzle end of the hose and if more than one hose is required they should be positioned to provide maximum coverage of the building and surrounds (i.e. at opposite ends of the habitable building).
 - All fire-fighting hoses shall be capable of withstanding the pressures of the supplied water.
 - All fire-fighting hoses shall be of reinforced construction manufactured in accordance with AS 2620 or AS 1221.
 - All fire-fighting hoses shall have a minimum nominal internal diameter of 18mm and a maximum length of 36 metres.
 - All fire-fighting hoses shall have an adjustable metal nozzle, or an adjustable PVC nozzle manufactured in accordance with AS 1221..
9. Minister's Code 2009 "Undertaking development in Bushfire Protection Areas" (as amended October 2012) Part 2.3.5 mandates that landscaping shall include Bushfire Protection features that will prevent or inhibit the spread of bushfire and minimise the risk to life and/or damage to buildings and property.
- A vegetation management zone (VMZ) shall be established and maintained within 20 metres of the refuge building as follows:
 - The number of trees and understorey plants existing and to be established within the VMZ shall be reduced and maintained such that when considered overall a maximum coverage of 50% is attained, and so that the leaf area of shrubs is not continuous. Careful selection of the vegetation will permit the 'clumping' of shrubs where desirable, for diversity, and privacy and yet achieve the 'overall maximum coverage of 50%'.
 - No understorey vegetation within 2 metre of the habitable building (understorey is defined as plants and bushes up to 2 metres in height).
 - The VMZ shall be maintained to be free of accumulated dead vegetation.
10. The applicant & operators shall formulate, practice and maintain an Emergency Response Plan that addresses the extreme risk associated this remote location presents, incorporating the following:
- Emergency Communication
 - Evacuation options and risk mitigation measures as a result of the reduced access proposed and the increased evacuation times that may be experienced
 - Emergency response training & regular drills
 - Operating hours and restrictions on days of extreme weather or bushfire events

Reason: to ensure appropriate safety requirements and hazard reduction practices are adopted during the construction and operational phases of the development.

ADVISORY NOTES

- a. This Development Plan Consent will expire after 12 months from the date of this Notification, unless final Development Approval from Council has been received within that period or this Consent has been extended by the State Commission Assessment Panel.

- b. The applicant is also advised that any act or work authorised or required by this Notification must be substantially commenced within 1 year of the final Development Approval issued by Council and substantially completed within 3 years of the date of final Development Approval issued by Council, unless that Development Approval is extended by the Council.
- c. The applicant has a right of appeal against the conditions which have been imposed on this Development Plan Consent. Such an appeal must be lodged at the Environment, Resources and Development Court within two months from the day of receiving this notice or such longer time as the Court may allow. The applicant is asked to contact the Court if wishing to appeal. The Court is located in the Sir Samuel Way Building, Victoria Square, Adelaide, (telephone number 8204 0289).
- d. Any changes to the proposal for which planning consent is sought or granted may give rise to heritage impacts requiring further consultation with the Department for Environment and Water, or an additional referral to the Minister for Environment and Water. Such changes would include for example
 - (a) an application to vary the planning consent, or
 - (b) Building Rules documentation that incorporates differences from the proposal as documented in the planning application.
- e. The applicant is advised of the following requirements of the Heritage Places Act 1993.
 - (a) If an archaeological artefact believed to be of heritage significance is encountered during excavation works, disturbance in the vicinity shall cease and the SA Heritage Council shall be notified.
 - (b) Where it is known in advance (or there is reasonable cause to suspect) that significant archaeological artefacts may be encountered, a permit is required prior to commencing excavation works. For further information, contact the Department for Environment and Water.
- f. The applicant is advised that any native vegetation on the site is protected under the Native Vegetation Act 1991 and Native Vegetation Regulations 2017. Prior to any clearance being undertaken (e.g. for trail networks and "look out" platforms), the applicant should seek Native Vegetation Council approval to do so.
- l. Compliance with the fire protection requirements is not a guarantee the habitable building will not burn, but its intent is to provide a 'measure of protection' from the approach, impact and passing of a bushfire.



Jeremy Wood
**TEAM LEADER, DEVELOPMENT ASSESSMENT
DEVELOPMENT DIVISION
DEPARTMENT OF PLANNING, TRANSPORT and INFRASTRUCTURE**

DRAWING	DATE	CURRENT ISSUE
DRAWING SCHEDULE	7.03.19	Rev 3
LOCALITY PLAN	7.03.19	Rev 3
SITE PLAN MAP L	7.03.19	Rev 3
EXISTING SITE PLAN	18.12.18	
PROPOSED SITE PLAN	7.03.19	Rev 3
SUN, WIND + VIEWS	18.12.18	
SITE PLAN: DETAIL	18.12.18	
EXISTING LODGE FLOOR PLANS	18.12.18	
LODGE FLOOR PLANS	18.12.18	
THE COMMONS	18.12.18	
WATER TANK LOOKOUTS	18.12.18	
SITE PHOTOS + EXISTING BUILDINGS	18.12.18	
ARCHITECTURAL TEXTURES + VIBES	18.12.18	
INTERNAL FINISHES + LITTLE THINGS: COMMONS	18.12.18	



KANGAROO ISLAND WALK CAPE DU COUEDIC DRAWING SCHEDULE

7 MARCH 2019 (Rev.3)



troppo



- - - Proposed guest access trail
 ——— Kangaroo Island Wilderness Trail

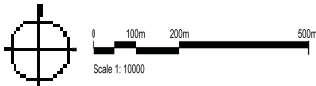


KANGAROO ISLAND WALK CAPE DU COUEDIC
LOCALITY PLAN

7 MARCH 2019 (Rev. 3)



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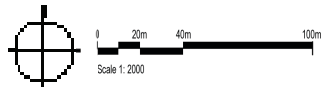


KANGAROO ISLAND WALK CAPE DU COUEDIC
LOCALITY PLAN

7 MARCH 2019 (Rev. 3)



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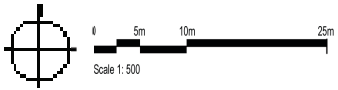
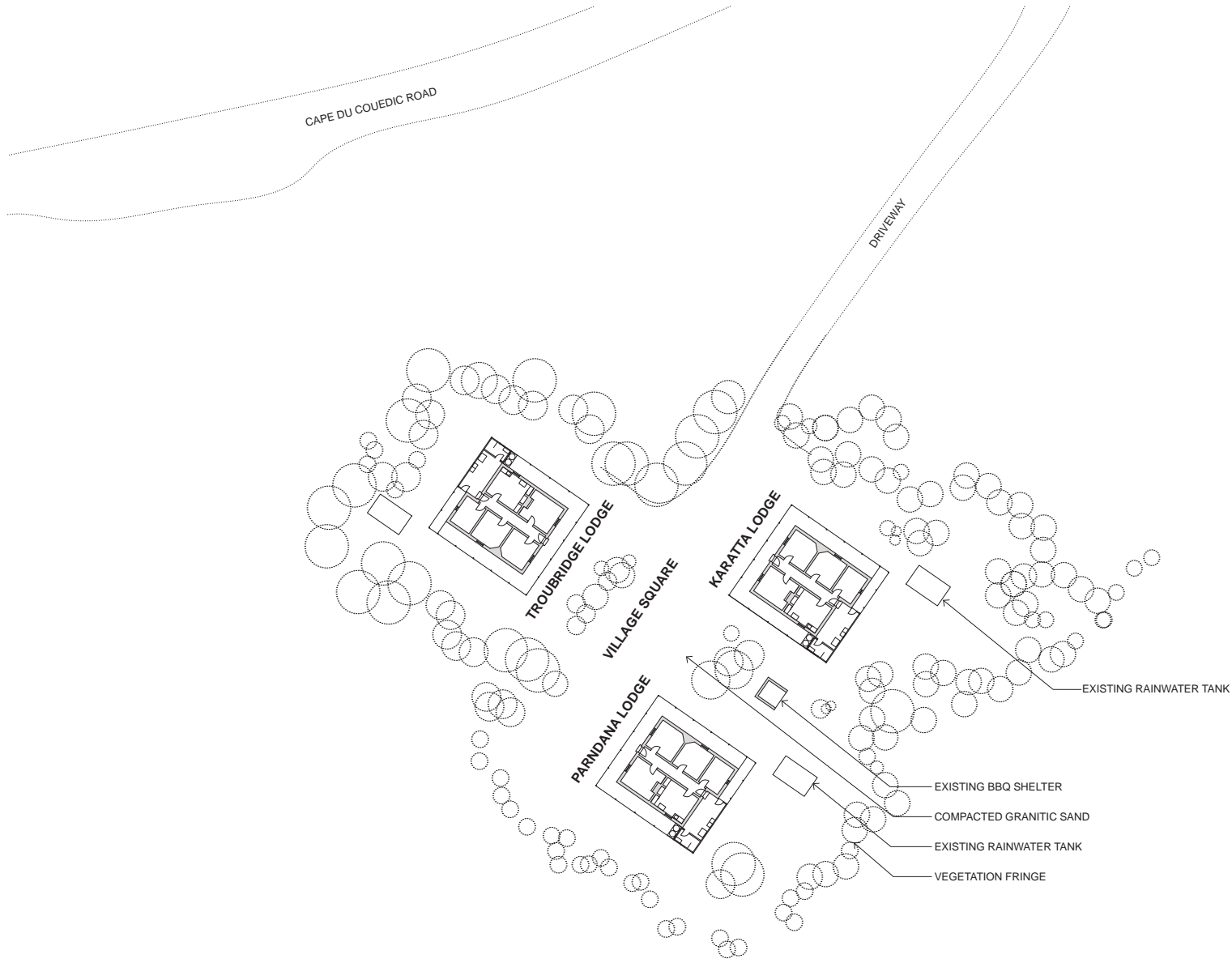


KANGAROO ISLAND WALK CAPE DU COUEDIC
SITE PLAN MAP L

7 MARCH 2019 (Rev.3)



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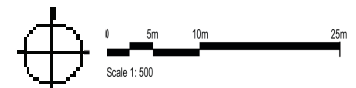


KANGAROO ISLAND WALK CAPE DU COUEDIC
EXISTING SITE PLAN

18 DEC 2018



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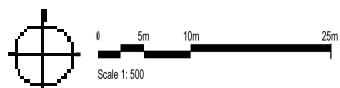


KANGAROO ISLAND WALK CAPE DU COUEDIC
PROPOSED SITE PLAN

7 MARCH 2019 (Rev. 3)



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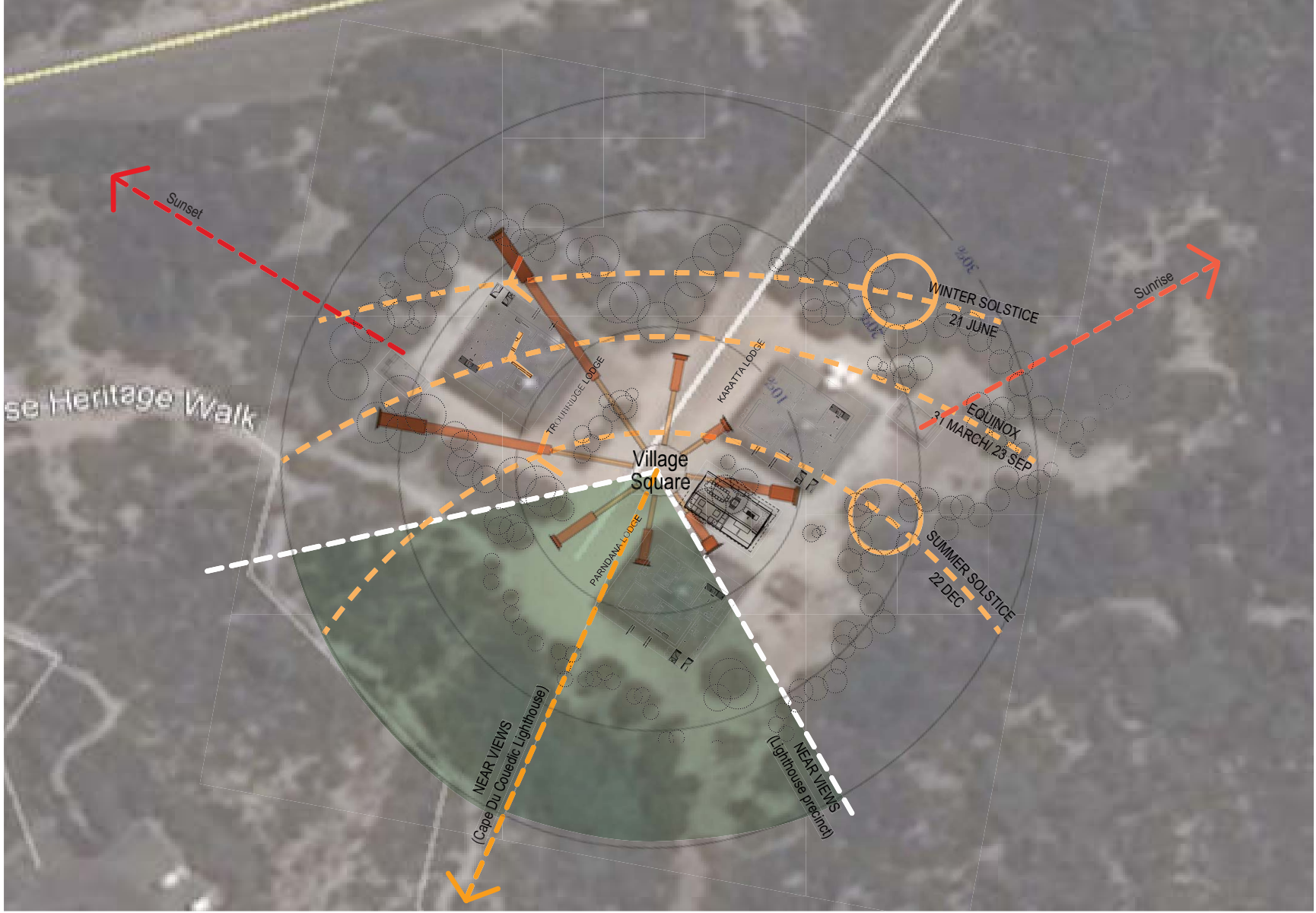


KANGAROO ISLAND WALK CAPE DU COUEDIC
PROPOSED SITE PLAN

7 MARCH 2019 (Rev.3)

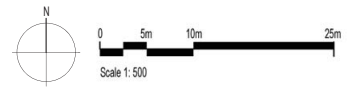


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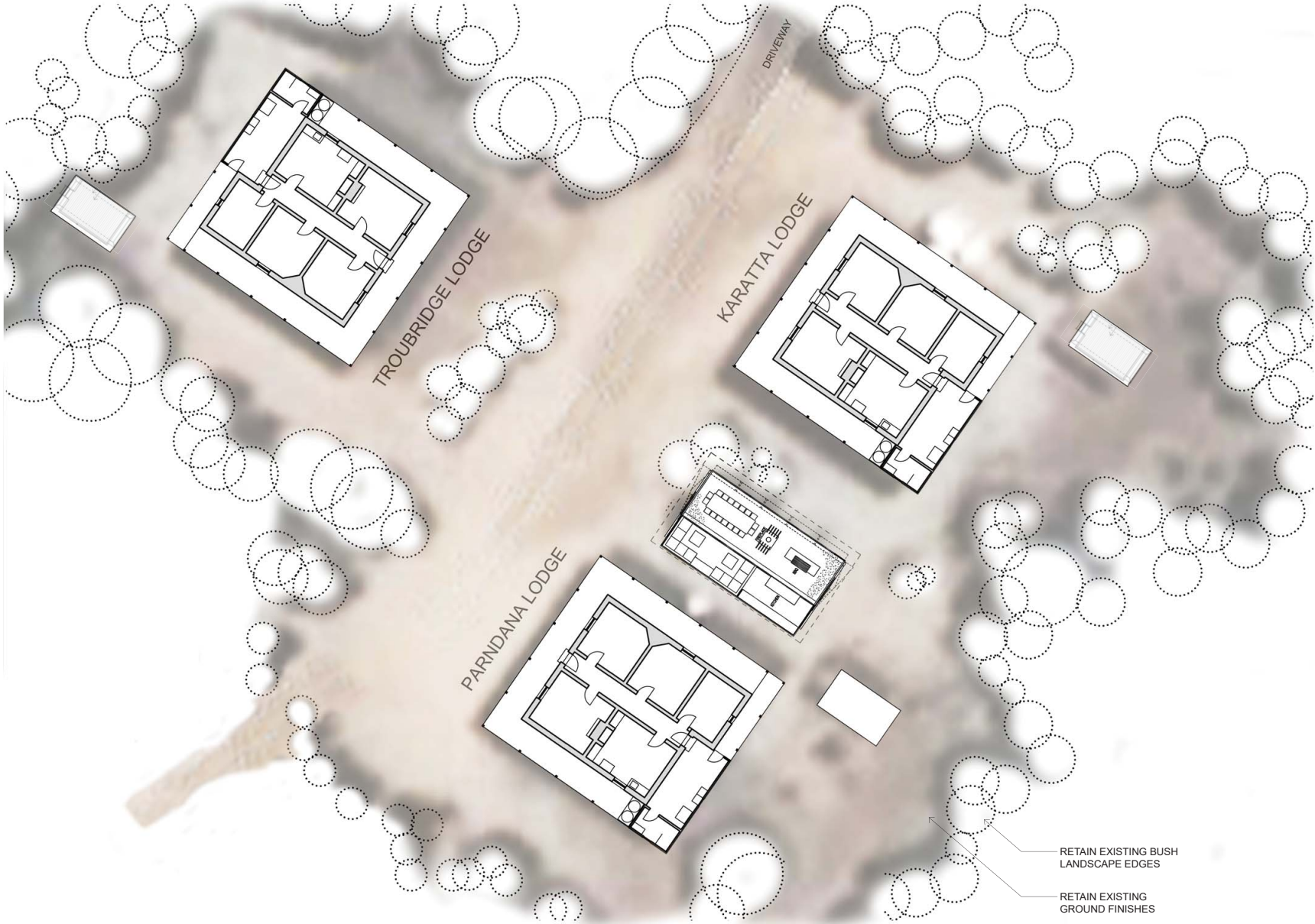


KANGAROO ISLAND WALK CAPE DU COUEDIC
SUN, WIND & VIEWS

18 DEC 2018

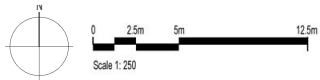


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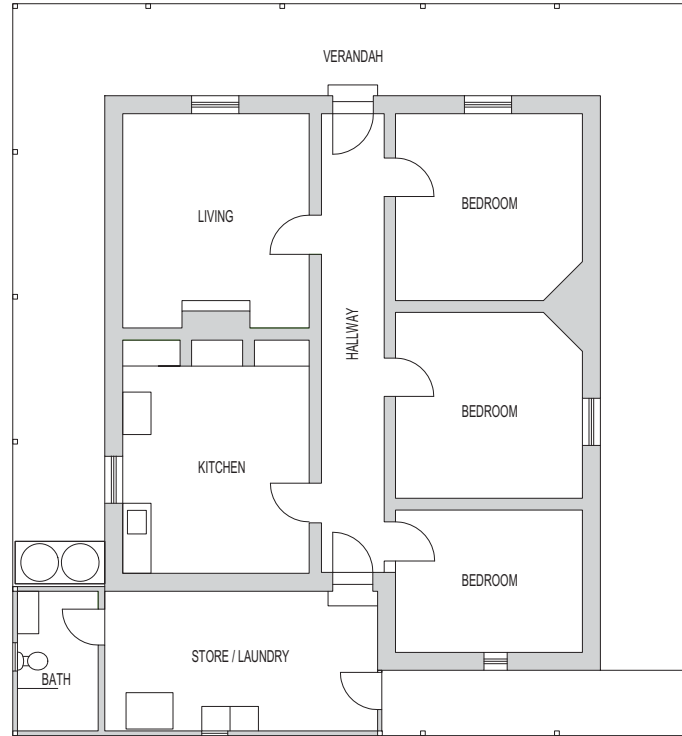


KANGAROO ISLAND WALK CAPE DU COUEDIC
SITE PLAN DETAIL

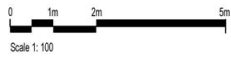
18 DEC 2018



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EXISTING FLOOR PLAN
TROUBRIDGE, PARNDANA AND KARATTA LODGES



KANGAROO ISLAND WALK CAPE DU COUEDIC
EXISTING LODGE FLOOR PLANS

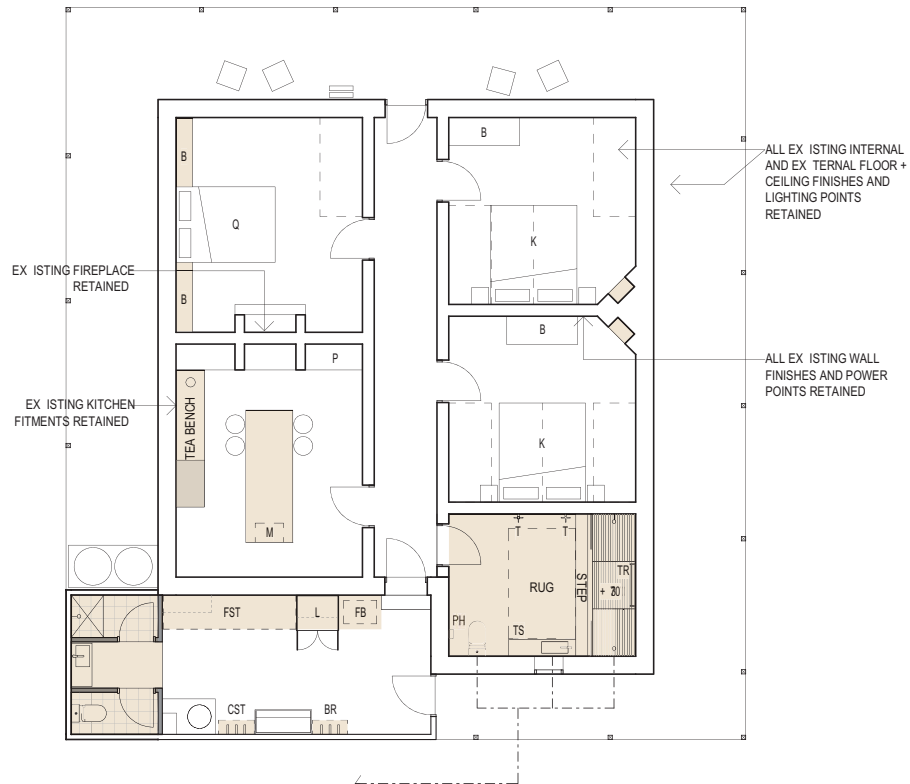
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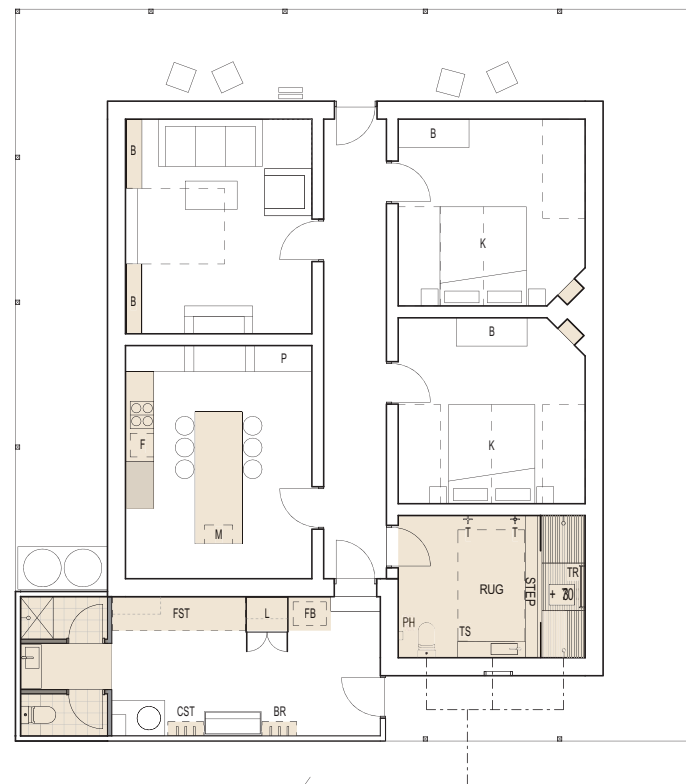
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KANGAROO ISLAND WALK CAPE DU COUEDIC LODGE FLOOR PLANS

18 DEC 2018



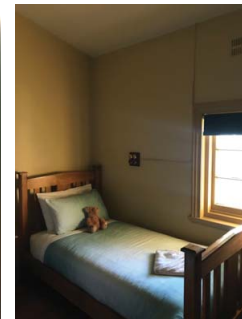
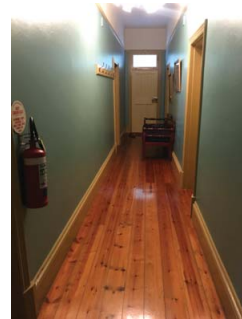
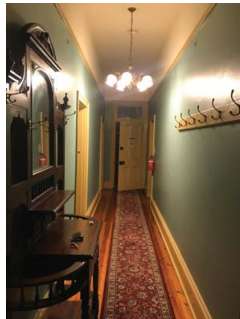
FLOOR PLAN - WALK MODE
TROUBRIDGE AND KARATTA LODGES



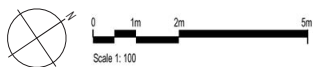
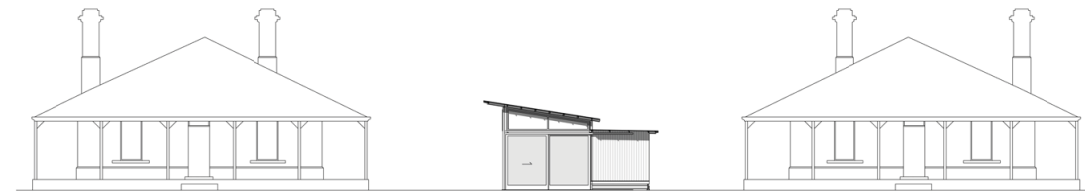
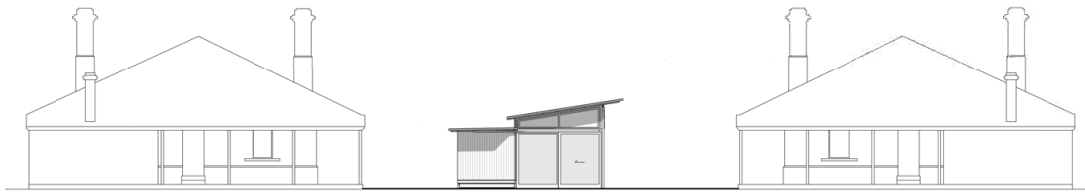
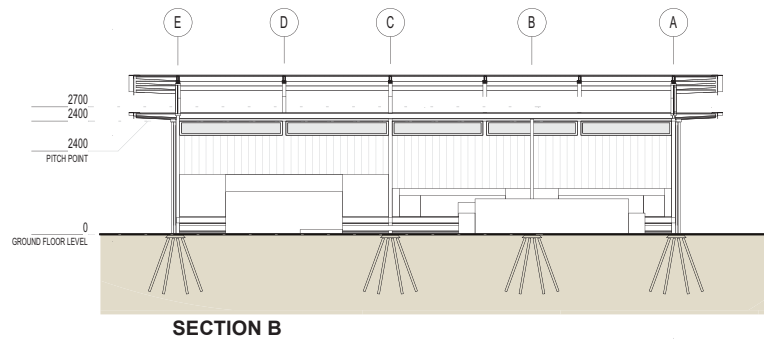
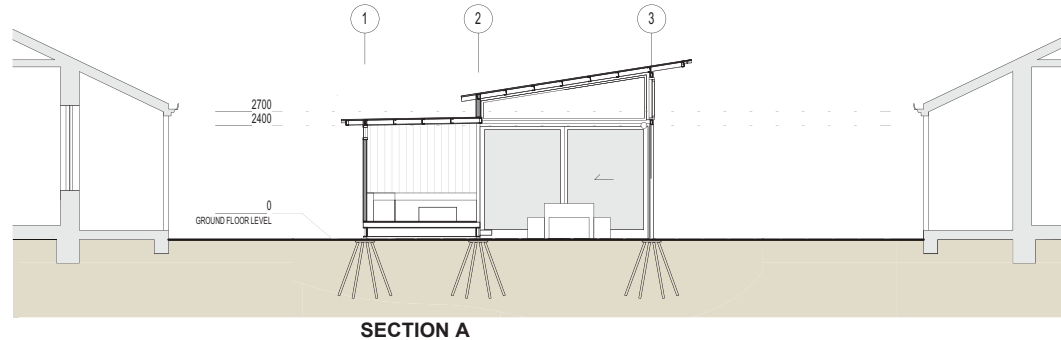
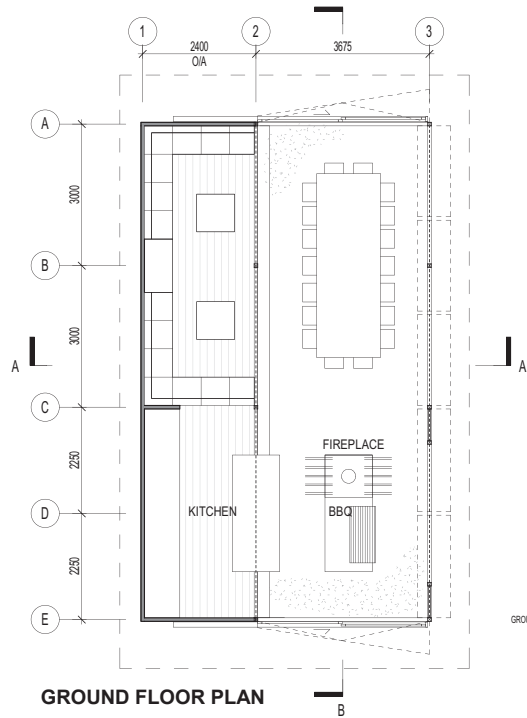
FLOOR PLAN - NON-WALK MODE
TROUBRIDGE AND KARATTA LODGES

PLAN KEY

- REFURBISHMENT AREAS/ ITEMS - REF ADDITIONAL DETAIL
- B BAG PARK
- BR BROOMS
- C CONSUMABLES/ MAINTENANCE
- F FRIDGE LOCATION
- FST FURNITURE STORE
- K KING BED
- L LINEN STORE
- M MICROWAVE UNDER
- P OPEN PANTRY UNDER
- PH TOILET PAPER HOLDER
- Q QUEEN BED
- T TREE
- TR TOWEL RAIL
- TS TOWEL STACK



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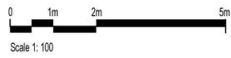
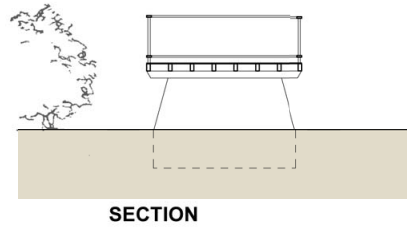
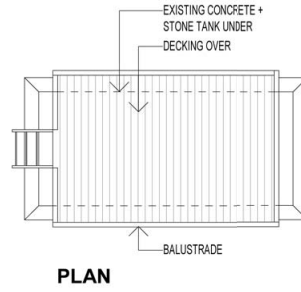


KANGAROO ISLAND WALK CAPE DU COUEDIC
THE COMMONS

18 DEC 2018



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KANGAROO ISLAND WALK CAPE DU COUEDIC
WATER TANK LOOKOUTS

18 DEC 2018



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End of the day's walk



Village Square



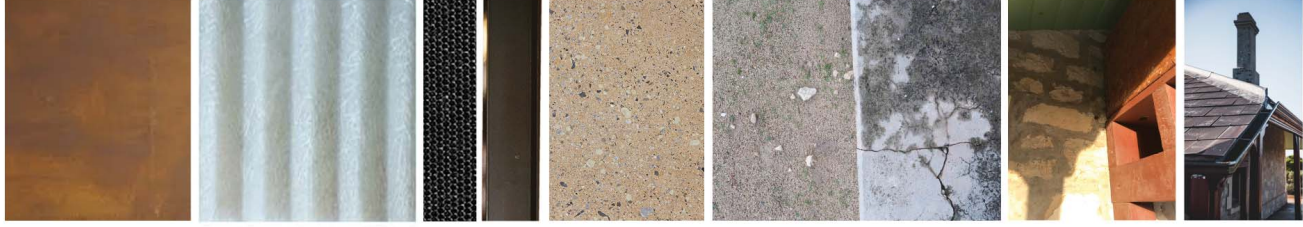
Lookout

KANGAROO ISLAND WALK CAPE DU COUEDIC
SITE PHOTOS & EXISTING BUILDINGS

18 DEC 2018



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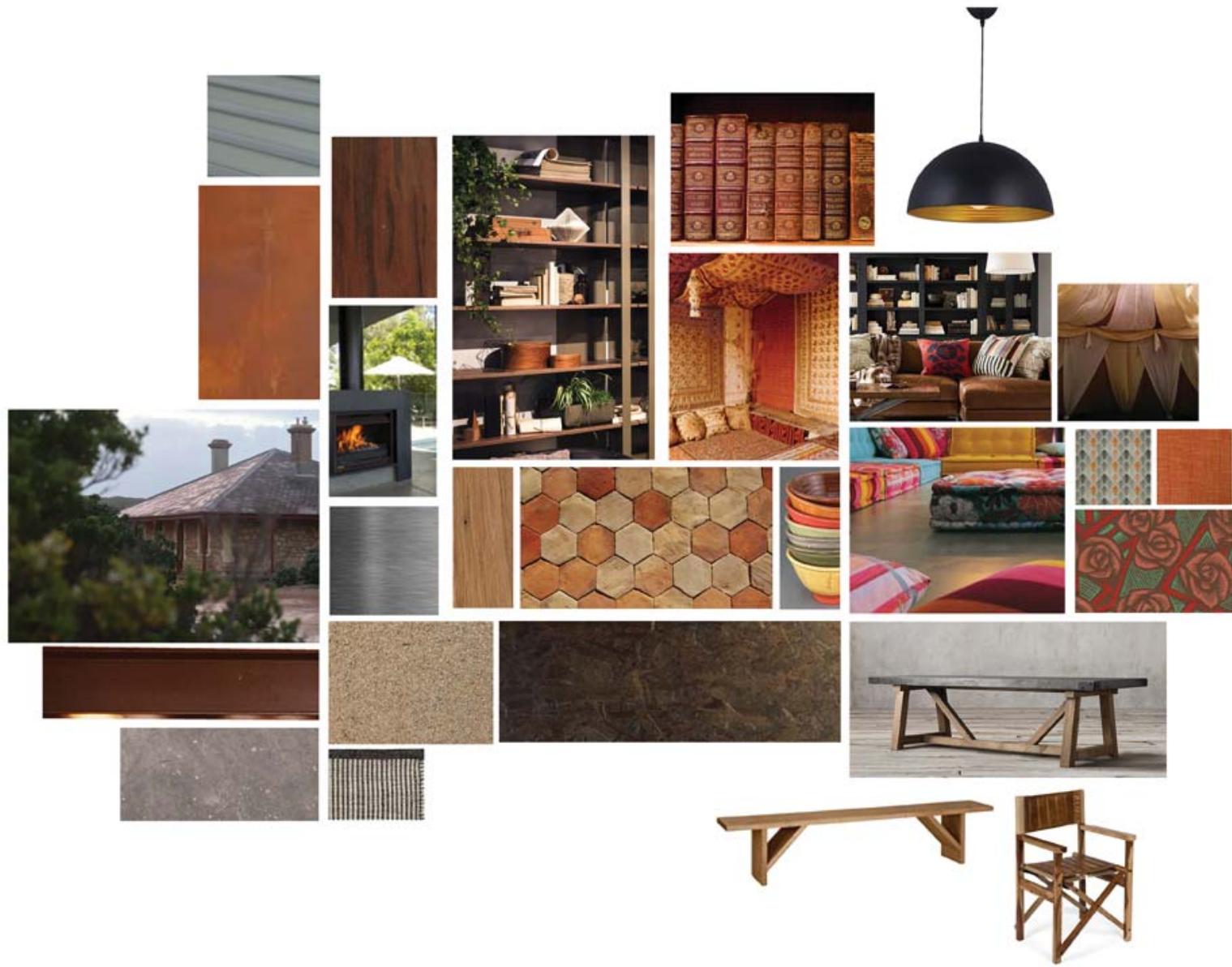


KANGAROO ISLAND WALK CAPE DU COUEDIC
ARCHITECTURAL TEXTURES & VIBES

18 DEC 2018



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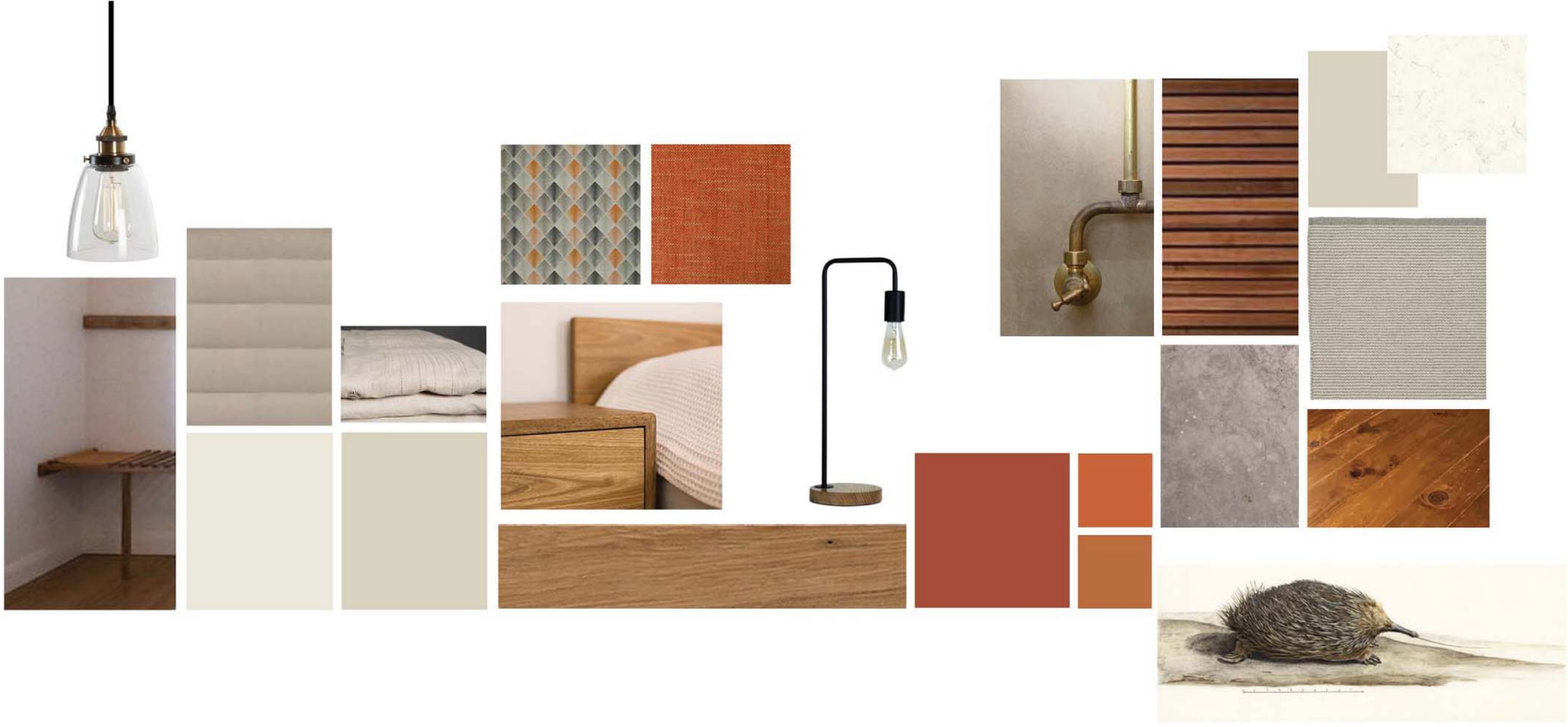


KANGAROO ISLAND WALK COMMONS: CAPE DU COUEDIC
INTERNAL FINISHES & LITTLE THINGS

18 DEC 2018



tropo



**KANGAROO ISLAND WALK LODGES: CAPE DU COUEDIC
INTERNAL FINISHES & LITTLE THINGS**

18 DEC 2018



troppo

DRAWING	DATE	CURRENT ISSUE
DRAWING SCHEDULE	13.05.19	Rev 4
LOCALITY PLAN	7.03.19	Rev 3
SITE PLAN MAP L	7.03.19	Rev 3
EXISTING SITE PLAN	18.12.18	
PROPOSED SITE PLAN	7.03.19	Rev 3
SUN, WIND + VIEWS	18.12.18	
SITE PLAN: DETAIL	18.12.18	
EXISTING LODGE FLOOR PLANS	18.12.18	
LODGE FLOOR PLANS	18.12.18	
THE COMMONS	13.05.19	Rev 1
WATER TANK LOOKOUTS	18.12.18	
SITE PHOTOS + EXISTING BUILDINGS	18.12.18	
ARCHITECTURAL TEXTURES + VIBES	18.12.18	
INTERNAL FINISHES + LITTLE THINGS: COMMONS	18.12.18	

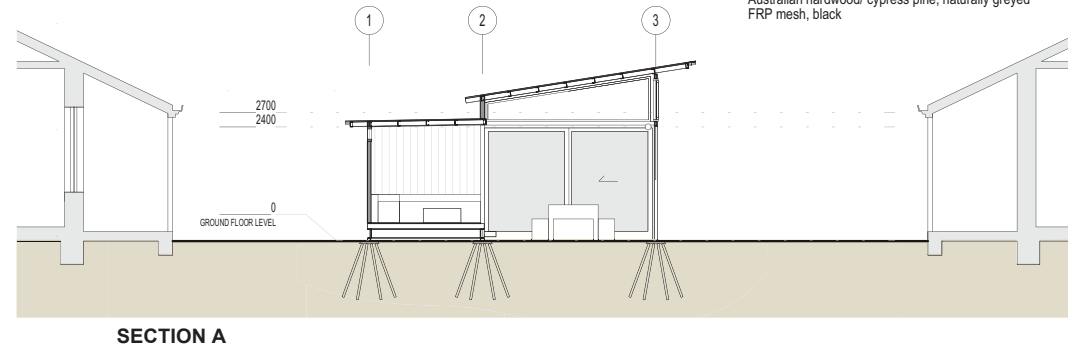
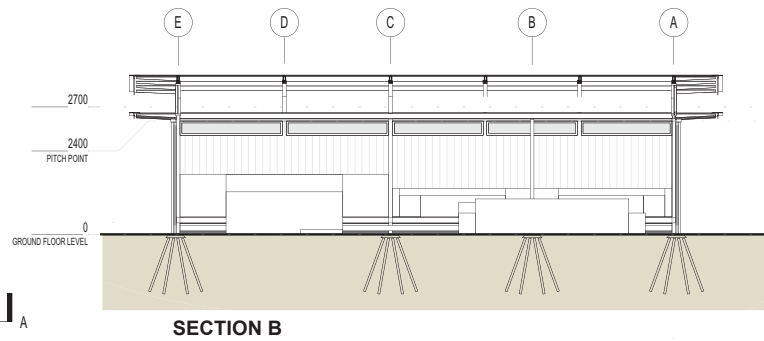
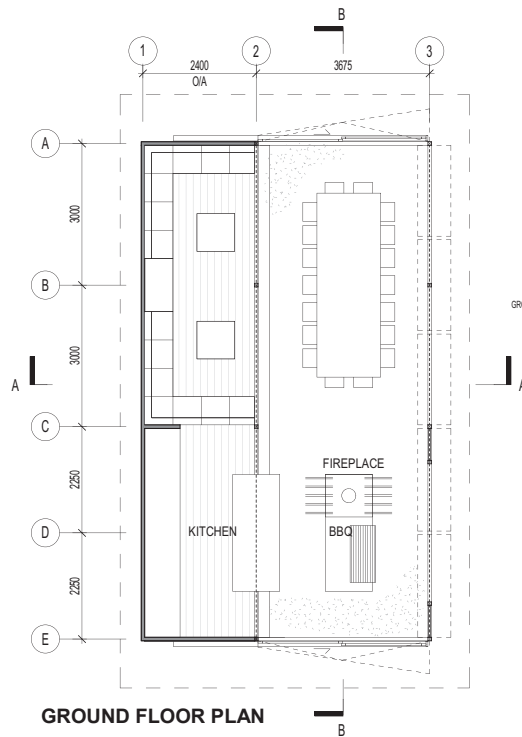


KANGAROO ISLAND WALK CAPE DU COUEDIC DRAWING SCHEDULE

13 MAY 2019 (Rev. 4)



tropo



MATERIAL SCHEDULE

EXPOSED FRAMING:
 Australian hardwood/ cypress pine, naturally greyed
 Steel, paint finish to dark tones
 Li-ten weathered (raw) steel

WALLS: EXT LININGS:
 Li-ten weathered (raw) steel
 Weathertex Natural, nil finish, naturally greyed

ROOFING:
 Li-ten weathered (raw) steel
 Ampelite 'Wonderglas GC', gel-coated Hreglass, ice clear

SCREENS/ SOFFITS:
 Li-ten weathered (raw) steel
 Jasper colorbond/ custom orb
 Ampelite 'Wonderglas GC', gel-coated Hreglass, ice clear
 Bush timber battens from road clearing, naturally greyed

WINDOWS/ DOORS:
 Select Australian hardwood frames, clear oil finish
 Performance glass/ Ampelite 'Wonderglas GC', gel-coated Hreglass, ice clear
 Polished Australian hardwood/ bush timber door furniture

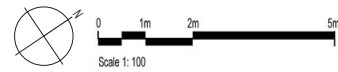
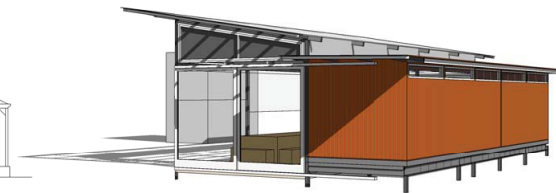
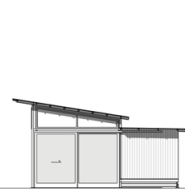
DECKING, SEATS, STEPS, BOARD WALKS, INC FRAMING:
 Australian hardwood/ cypress pine, naturally greyed
 FRP mesh, black



SOUTHEAST ELEVATION
1:200



NORTHWEST ELEVATION
1:200



KANGAROO ISLAND WALK CAPE DU COUEDIC
THE COMMONS

13 MAY 2019 (Rev. 1)



troppo

DEVELOPMENT APPLICATION FORM

PLEASE USE BLOCK LETTERS

COUNCIL: Kangaroo Island Council
APPLICANT: Australian Walking Company C/- Fyfe
 Postal Address: GPO Box 2450
Adelaide, SA, 5001

Owner: DEW as custodian for the Crown
 Postal Address: GPO Box 1047
Adelaide, SA, 5001

BUILDER: TBA

 Postal Address: TBA

 _____ Licence No: TBA

CONTACT PERSON FOR FURTHER INFORMATION

Name: Michael Osborn
 Telephone: 0408 808 143 [work] 8407 9448 [Ah]
 Fax: _____ [work] _____ [Ah]
EXISTING USE: Vacant

FOR OFFICE USE	
Development No: _____	
Previous Development No: _____	
Assessment No: _____	

<input type="checkbox"/> Complying <input type="checkbox"/> Non Complying <input type="checkbox"/> Notification Cat 2 <input type="checkbox"/> Notification Cat 3 <input type="checkbox"/> Referrals/Concurrences <input type="checkbox"/> DA Commission	Application forwarded to DA Commission/Council on _____ / _____ / _____ Decision: _____ Type: _____ Date: _____ / _____ / _____
---	--

	Decision required	Fees	Receipt No	Date
Planning:	_____	_____	_____	_____
Building:	_____	_____	_____	_____
Land Division:	_____	_____	_____	_____
Additional:	_____	_____	_____	_____
Development Approval				

DESCRIPTION OF PROPOSED DEVELOPMENT: Internal alterations to existing State Heritage Place, demolition of the existing barbeque shelter and construction of a common room

LOCATION OF PROPOSED DEVELOPMENT: Cape Du Couedic, Flinders Chase National Park, Kangaroo Island

House No: _____ Lot No: _____ Street: Cape Du Couedic Road Town/Suburb: Flinders Chase
 Section No [full/part] Piece 55 Hundred: OH (Kingscote) Volume: 6176 Folio: 336
 Section No [full/part] _____ Hundred: _____ Volume: _____ Folio: _____

LAND DIVISION:

Site Area [m²] _____ Reserve Area [m²] _____ No of existing allotments _____
 Number of additional allotments [excluding road and reserve]: _____ Lease: YES NO

BUILDING RULES CLASSIFICATION SOUGHT: 1b and 10 Present classification: -

If Class 5,6,7,8 or 9 classification is sought, state the proposed number of employees: Male: - Female: -

If Class 9a classification is sought, state the number o persons for whom accommodation is provided: -

If Class 9b classification is sought, state the proposed number of occupants of the various spaces at the premises: -

DOES EITHER SCHEDULE 21 OR 22 OF THE DEVELOPMENT REGULATIONS 2008 APPLY? YES NO

HAS THE CONSTRUCTION INDUSTRY TRAINING FUND ACT 2008 LEVY BEEN PAID? YES NO

DEVELOPMENT COST [do not include any fit-out costs]: \$ 250,000

I acknowledge that copies of this application and supporting documentation may be provided to interested persons in accordance with the Development Regulations 2008.

SIGNATURE: _____ Dated: 08 / 11 / 2018

This Crown Record Register Search is a true and correct extract of the Register of Crown Records maintained by the Registrar-General. Crown Land is administered pursuant to the Crown Land Management Act 2009 by the Department of Environment, Water and Natural Resources.

Crown Record - Volume 6176 Folio 336

Parent Title(s)	CR 5778/21				
Creating Dealing(s)	TG 12509743				
Title Issued	24/06/2016	Edition	1	Edition Issued	24/06/2016

Estate Type

CROWN LAND (ALIENATED)

Owner

THE CROWN

Custodian

MINISTER FOR SUSTAINABILITY, ENVIRONMENT AND CONSERVATION
OF ADELAIDE SA 5000

Description of Land

SECTION 18
HUNDRED OF BORDA
IN THE AREA NAMED CAPE BORDA

SECTIONS 950 AND 951
HUNDRED OF CASUARINA ISLETS

SECTIONS 42, 43, 44 AND 45
HUNDRED OF GOSSE
IN THE AREA NAMED GOSSE

SECTION 21
HUNDRED OF MCDONALD
IN THE AREA NAMED GOSSE

SECTION 42
HUNDRED OF RITCHIE
IN THE AREA NAMED KARATTA

SECTIONS 43, 44 AND 45
HUNDRED OF RITCHIE
IN THE AREA NAMED GOSSE

ALLOTMENTS 1, 2 AND 3 DEPOSITED PLAN 27908
IN THE AREA NAMED FLINDERS CHASE
OUT OF HUNDREDS (KINGSCOTE) AND HUNDRED OF MCDONALD

ALLOTMENT 51 DEPOSITED PLAN 38340
IN THE AREA NAMED FLINDERS CHASE
OUT OF HUNDREDS (KINGSCOTE) AND HUNDRED OF MCDONALD

ALLOTMENT COMPRISING PIECES 53, 54 AND 55 DEPOSITED PLAN 38340
IN THE AREA NAMED FLINDERS CHASE
OUT OF HUNDREDS (KINGSCOTE) AND HUNDRED OF MCDONALD

ALLOTMENT 1 FILED PLAN 31869
IN THE AREA NAMED FLINDERS CHASE
HUNDRED OF MCDONALD

TOTAL AREA: 330KM² (APPROXIMATE)

Easements

SUBJECT TO EASEMENT(S) OVER PORTION OF ALLOTMENT 1 IN D27908 AND PORTIONS OF PIECE 55 IN D38340 MARKED A ON F53662 (TG 12509743)

SUBJECT TO EASEMENT(S) OVER PORTION OF PIECE 55 IN D38340 MARKED B ON F53662 (TG 12509743)

Schedule of Dealings

Dealing Number	Description
12540084	NATIONAL PARK PURSUANT TO NATIONAL PARKS AND WILDLIFE ACT 1972

Schedule of Interests

Licence Number	Description
NL000173	ANNUAL LICENCE TO BUREAU OF METEOROLOGY - SCIENCE DEPT FOR INFRASTRUCTURE PURPOSES COMMENCING ON 01/07/2000 AND EXPIRING ON 30/06/2020
PK000151	ANNUAL LICENCE TO AUSTRALIAN MARITIME SAFETY AUTHORITY FOR INFRASTRUCTURE PURPOSES COMMENCING ON 08/12/1993 AND EXPIRING ON 07/12/2092
PK000263	ANNUAL LICENCE TO THE UNIVERSITY OF ADELAIDE FOR INFRASTRUCTURE PURPOSES COMMENCING ON 14/04/2003 AND EXPIRING ON 13/04/2028
PK000282	ANNUAL LICENCE TO R A & J R COWIN FAMILY TRUST AND J R & L M TIPPETT FAMILY TRUST FOR COMMERCIAL OR INDUSTRIAL PURPOSES COMMENCING ON 01/01/2005 AND EXPIRING ON 31/12/2019

Notations

Dealings Affecting Title NIL

Priority Notices NIL

Registrar-General's Notes

APPROVED FX43750
APPROVED FX53662

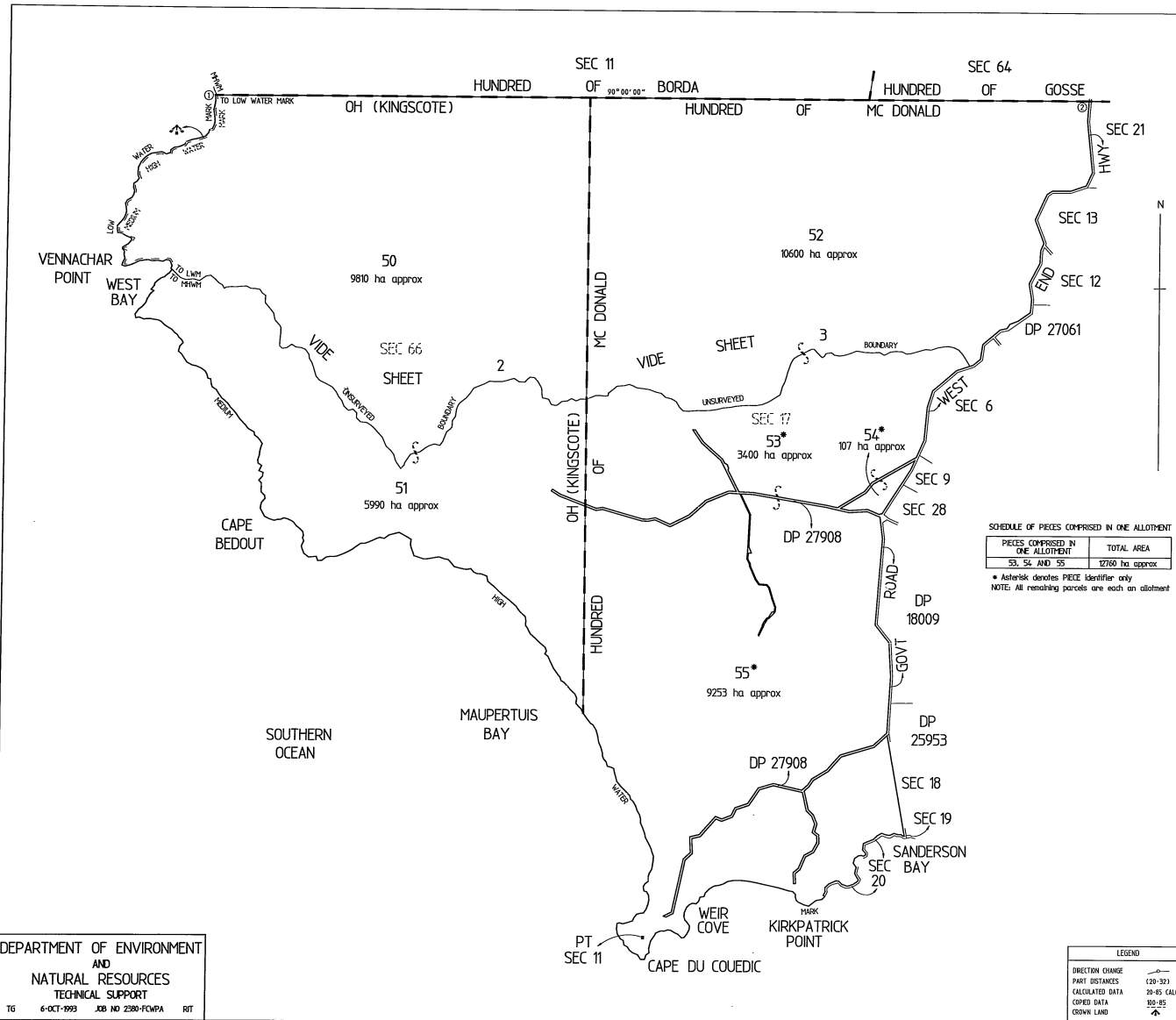
Administrative Interests

CONFIRMED IN SA HERITAGE REGISTER 08/11/1984
CONFIRMED IN SA HERITAGE REGISTER 12/01/1984
CONFIRMED IN SA HERITAGE REGISTER 24/07/1980
CONFIRMED IN SA HERITAGE REGISTER 14/12/1995
SIGNIFICANT ENVIRONMENTAL BENEFIT 2009_3077
SIGNIFICANT ENVIRONMENTAL BENEFIT 2012_3122
COMMONWEALTH HERITAGE PLACE 22/06/2004

D38340



D38340



PLAN NUMBER
DP 38340

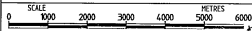
THIS IS SHEET 1 OF 3 SHEET

DEPOSITED 14/10/93
ACCEPTED FOR FILING 14/10/93
MAP REF 6226-II & III DEV No
TITLE SYSTEM CROWN
TITLE REFERENCE N/A
D B / LAST PLAN REF TOTAL AREA
DOCKET No SD 1022
FIELD BOOK No N/A

PLAN EXAMINED
PLAN APPROVED
12-10-93

IRRIGATION AREA: DIVISION
HUNDRED MC DONALD AND OH (KINGSCOTE)
TOWNSHIP AREA
COUNCIL DISTRICT COUNCIL OF KINGSCOTE

PLAN OF DIVISION OF SECTION 17 AND UNALLOTTED CROWN LAND, HUNDRED MC DONALD AND SECTION 66, OUT OF HUNDREDS (KINGSCOTE), PURSUANT TO THE CROWN LANDS ACT.



STATEMENTS CONCERNING EASEMENTS ANNOTATIONS AND EMBLEMENTS
BOUNDARIES AND APPROXIMATE LOCATION OF MEDIUM HIGH WATER MARK HAS BEEN DIGITISED FROM MAPS 6226-II & III

APPROXIMATE LOCATION OF LOW WATER MARK HAS BEEN ESTIMATED FROM AERIAL PHOTO SURVEY 4000 PHOTO 7

DP 27908 AND PT SEC 11 DO NOT FORM PART OF THIS DIVISION

LOTS 50 AND 52 TO BE PROCLAIMED AS WILDERNESS PROTECTION AREA

ALL DISTANCES ARE GROUND DISTANCES

BEARING DATUM: ①-②, 90°00'00" SCALED
DERIVED FROM 6226-II

SCHEDULE OF PIECES COMPRISED IN ONE ALLOTMENT

PIECES COMPRISED IN ONE ALLOTMENT	TOTAL AREA
53, 54 AND 55	12760 ha approx

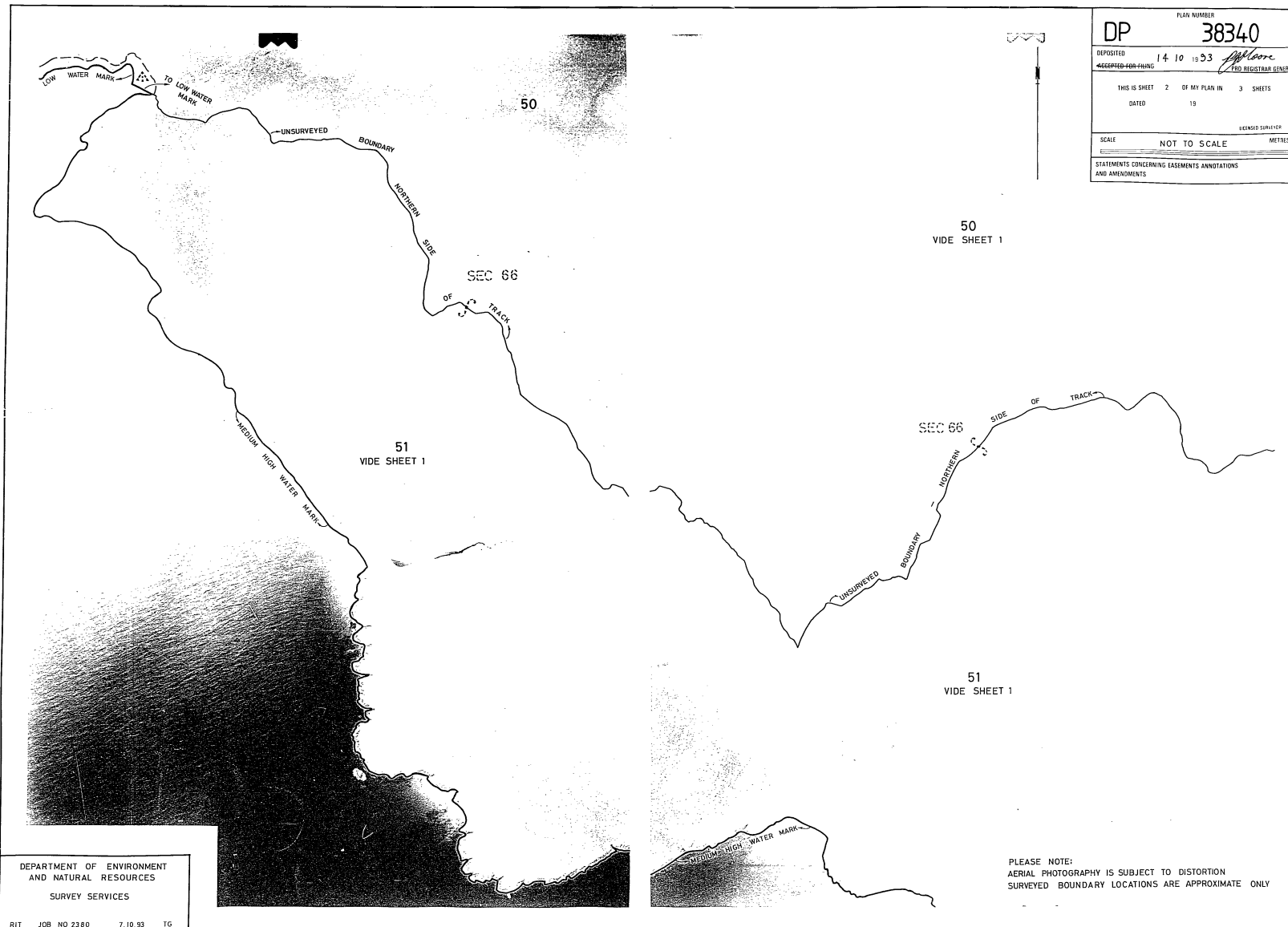
* Asterisk denotes PIECE identifier only
NOTE: All remaining parcels are each an allotment

LEGEND

DIRECTION CHANGE	↔
PART DISTANCES	(10-30)
CALCULATED DATA	90-85 CALC
COPIED DATA	90-85
CROWN LAND	↑

DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
TECHNICAL SUPPORT
TG 6-OCT-1993 JOB NO 2380-FCWPA RTT

MICROFILMED
18. 10. 93



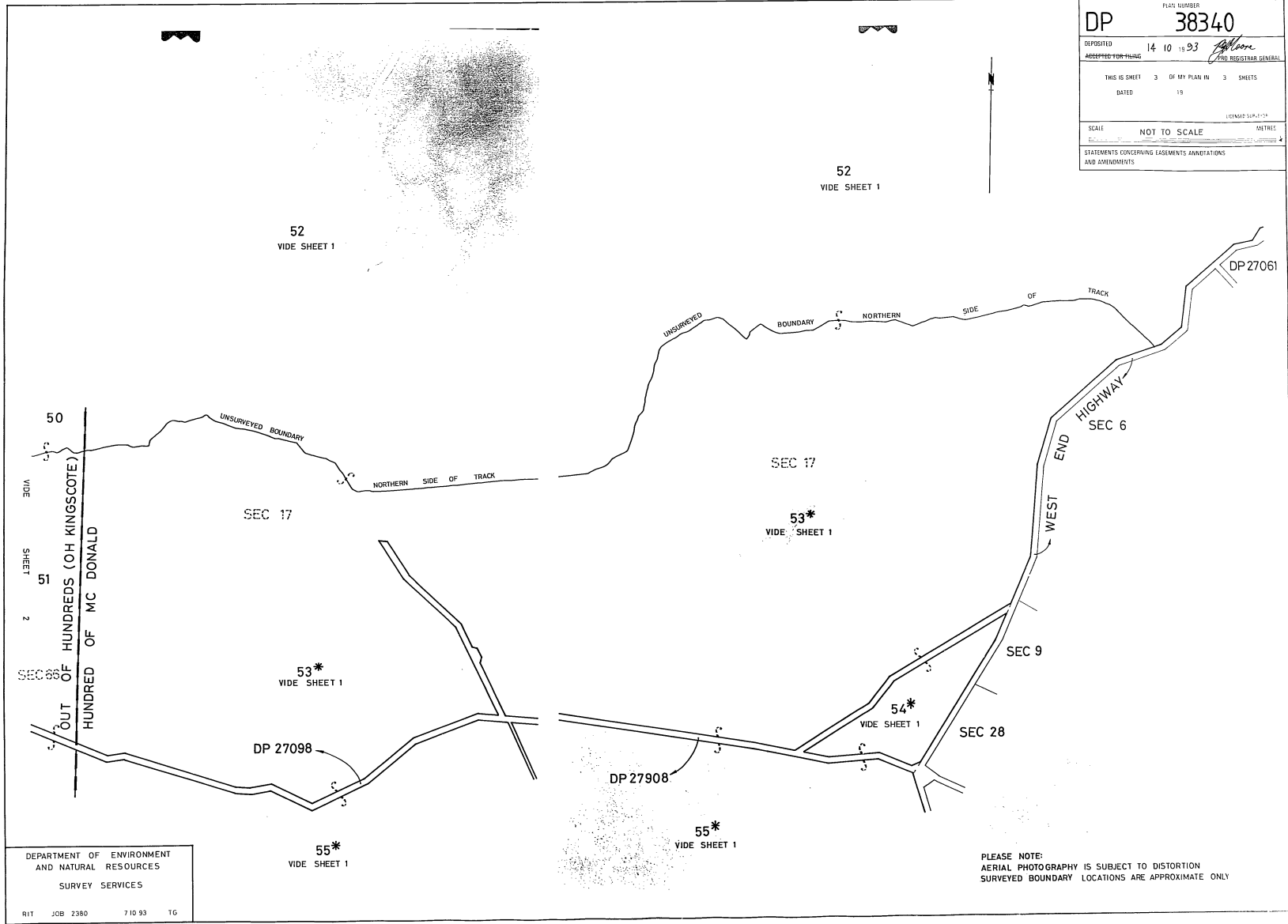
PLAN NUMBER	38340		
DEPOSITED	14 10 19 53	<i>John Moore</i>	
ACCEPTED FOR FILING	PRO REGISTRAR GENERAL		
THIS IS SHEET	2	OF MY PLAN IN	3 SHEETS
DATED	19		
LICENSED SURVEYOR			
SCALE	NOT TO SCALE		METRES
STATEMENTS CONCERNING EASEMENTS ANNOTATIONS AND AMENDMENTS			

DEPARTMENT OF ENVIRONMENT
AND NATURAL RESOURCES
SURVEY SERVICES
RIT JOB NO 2380 7.10.93 TG

PLEASE NOTE:
AERIAL PHOTOGRAPHY IS SUBJECT TO DISTORTION
SURVEYED BOUNDARY LOCATIONS ARE APPROXIMATE ONLY

MICROFILMED
18. 10. 93

DP	PLAN NUMBER	38340
DEPOSITED	14 10 19 93	<i>William</i>
ACCEPTED FOR FILING	THE REGISTRAR GENERAL	
THIS IS SHEET	3	OF MY PLAN IN 3 SHEETS
DATED	19	
SCALE	NOT TO SCALE	METRES
STATEMENTS CONCERNING EASEMENTS ANNOTATIONS AND AMENDMENTS		



DEPARTMENT OF ENVIRONMENT
AND NATURAL RESOURCES
SURVEY SERVICES
RIT JOB 2380 7 10 93 TG

PLEASE NOTE:
AERIAL PHOTOGRAPHY IS SUBJECT TO DISTORTION
SURVEYED BOUNDARY LOCATIONS ARE APPROXIMATE ONLY

MICROFILMED



KANGAROO ISLAND WILDERNESS TRAIL ACCOMMODATION
PLANNING STATEMENT
CAPE DU COUEDIC, FLINDERS CHASE NATIONAL PARK

PREPARED FOR | Australian Walking Company

PREPARED BY | Fyfe Pty Ltd

ABN | 57 008 116 130

ADDRESS | L1, 124 South Terrace, Adelaide SA 5000

CONTACT | Michael Osborn

TELEPHONE | office 61 8 8201 9600

FACSIMILE | 61 8 8201 9650

EMAIL | Michael.osborn@fyfe.com.au

DATE | 5/11/2018

REFERENCE | 65248-2 V2 Report

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Revision History

Revision	Revision Status	Date	Prepared	Reviewed	Approved
V1	Draft for review	10/10/2018	KG	MO	MO
V2	Amended	5/11/2018	KG	MO	MO



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APPENDICES

Appendix A	Crown Record
Appendix B	Concept Design Report prepared by Troppo Architects
Appendix C	Proposal Plans (including the stormwater and wastewater layout) prepared by Troppo Architect
Appendix D	Letter of support from john schutz, chief executive of dew
Appendix E	Performance Based Solution report prepared by SA Bushfire Solutions
Appendix F	Indicative Bushfire Attack Level (BAL) Assessment Report prepared by SA Bushfire Solutions



1. INTRODUCTION

This planning statement has been prepared in relation to a development application for the Australian Walking Company (AWC) to develop tourist accommodation along the Kangaroo Island Wilderness Trail (KIWT) in Flinders Chase National Park.

In 2013, the development of a multi-day walking trail was identified by the South Australian Tourism Commission (SATC) as a critical need for the development of the tourism industry on Kangaroo Island and to compete with nature-based destinations worldwide. Five years later, the 61 kilometre Kangaroo Island Wilderness Trail (KIWT) has been developed and the next priority of the SATC, the Department of Environment and Water (DEW) and National Parks SA was to improve the diversity of accommodation and guided walking experiences along the multi-million dollar trail.

To facilitate this, an opportunity was presented to the private sector by DEW and SATC to develop exclusive, eco-sensitive accommodation and tours to tourists and an expression of interest process occurred. At the conclusion of this process, the AWC was selected as the preferred commercial tour operator.

The AWC, as well as the partnered Tasmanian Walking Company (TWC), specialise in providing fully guided, small group bushwalking experiences, with innovative, ecologically-sensitive accommodation and ecologically-sustainable operating principles. The unique experience that AWC and TWC offer includes exclusive overnight accommodation that is not usually associated with camping and bushwalking by providing their guests access to a shower, bed and a prepared meal. Examples of experiences and accommodation offered by the AWC and TWC include the Twelve Apostles Lodge Walk (<https://twelveapostleslodgewalk.com.au/>) and the Bay of Fires Lodge Walk (<https://www.taswalkingco.com.au/bay-of-fires-lodge-walk/>).

The AWC, in conjunction with DEW, propose to offer this experience along the KIWT in a 4 day, 3 night fully guided small group bushwalking tour for 14 people, staying two nights in high end 'standing camp' accommodation and one night in the existing State Heritage Cape du Couedic Lighthouse Keepers' Cottages. Figure 1.1 illustrates the extent of the trail and the location of overnight accommodation.

Given the dispersed spatial location of the accommodation nodes, three separate development applications are proposed in order to secure the relevant approvals under the *Development Act 1993*.

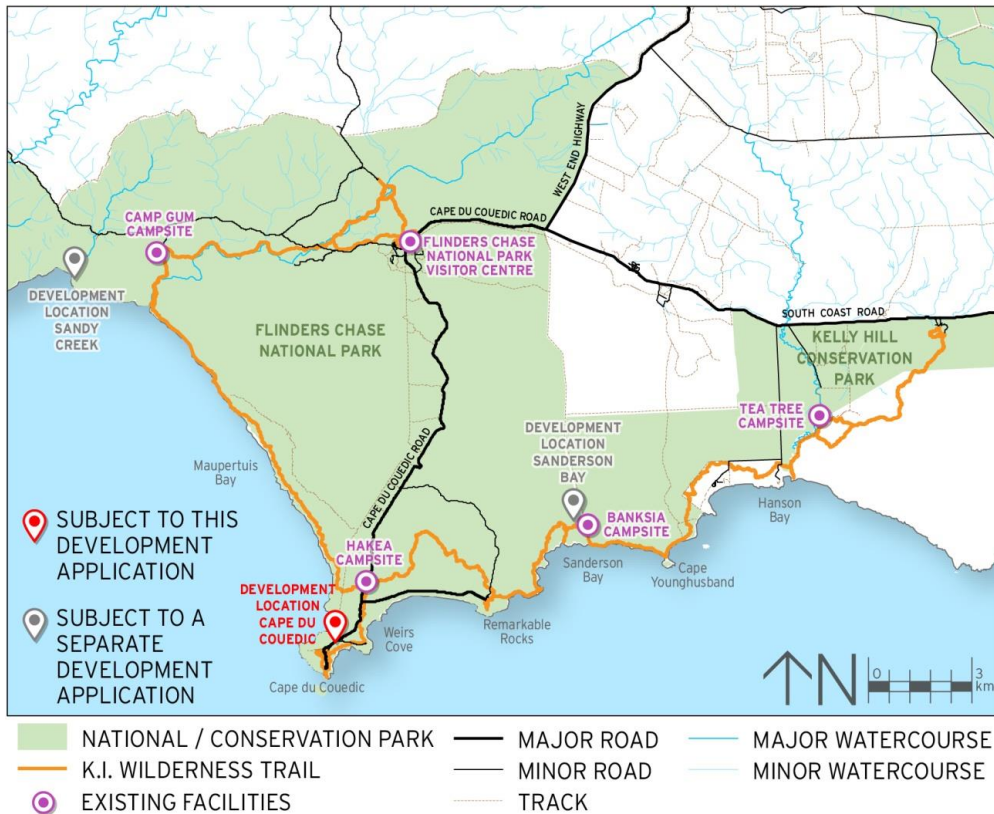


Figure 1.1 Proposed Australian Walking Company Tour and Accommodation

This development application is for accommodation for the second night of the experience and is located within the existing State Heritage Cape du Couedic Lighthouse Keepers' Cottages. The subject land is identified as Piece 55 on Crown Record Volume 6176 and Folio 336.

The proposed development is for internal alterations to the existing State Heritage Place and construction of a common room. The internal alterations comprise the following:

- Conversion of one bedroom in each cottage to a second bathroom;
- Updates to the existing bathroom;
- Updates to the existing kitchen whilst retaining the existing kitchen sink bench and woodfire cooker; and
- Internal alterations to the existing store/laundry.



The cottages are currently utilised for tourist accommodation purposes and therefore, the proposed development will not change the land use of these cottages.

The subject land is situated within the Conservation Zone, as identified by Zone Map KI/1 in the Kangaroo Island Council Development Plan (consolidated 17 September 2015).

The proposed development is neither a complying or non-complying form of development in the Conservation Zone, and must therefore be assessed on its merit.

In preparing this report we have reviewed the following plans and documents which form part of the application and are appended to this report:

- Crown Record 6176/336 (Appendix A);
- Concept Design Report prepared by Troppo Architects (Appendix B);
- Proposal Plans (including the stormwater and wastewater layout) prepared by Troppo Architects (Appendix C);
- Letter of support from John Schutz, Chief Executive of DEW;
- A report prepared by SA Bushfire Solutions documenting the proposed Performance Based Solution (Appendix D); and
- Indicative Bushfire Attack Level (BAL) Assessment Report prepared by SA Bushfire Solutions (Appendix E).

Following our review of the application documents and our assessment of the relevant provisions of the Development Plan, we have formed the opinion that the proposed development warrants Development Plan Consent.



2. THE SUBJECT LAND AND LOCALITY

The subject land is identified as Piece 55 on Crown Record Volume 6176 and Folio 336. A copy of this Crown Record is attached as Appendix A. Figure 2.1 below identifies the location of the land.



Figure 2.1 Location of Cape du Couedic

The site of the development is the State Heritage listed Cape du Couedic Lighthouse Keepers' Cottages as shown in Figure 2.2 below.

These cottages are situated in the Flinders Chase National Park, identified as a National Park on Location Map KI/1 within the Development Plan. The entire subject land itself is more than 9000 hectares in size and as a result, this description of the subject land is focused on the Cape du Couedic development site.



Figure 2.2 Existing State Heritage listed Cape du Couedic Lighthouse Keepers' Cottages with Lighthouse in the background

The locality forms part of a key tourism precinct within Flinders Chase National Park with the Cape du Couedic Lighthouse, Admirals Arch and Fur Seal Lookout with associated public car parks all within a 20 minute walk to the south of the cottages. The cottages themselves do not form part of the public realm of these tourism attractions and do not have a road frontage but rather the private driveway and the roofs of the cottages are all that is visible from Cape du Couedic Road. The only clear link between these cottages and the remainder of the heritage precinct is the Lighthouse Heritage Walk adjacent the cottages which includes a small interpretive display with photos and the history of the cottages and settlement of this area.

The landscape itself gently slopes down towards the surrounding coast with the prevailing slope down towards the south west.

The subject land contains three existing cottages, a barbeque shelter and a rainwater tank. A parking area for two cars (double stacked) is available directly adjacent each cottage. Native vegetation in the form of Mallee Woodland and 'shrubland' surrounds the site and obscures views of the cottages from the adjacent road.



3. DESCRIPTION OF THE PROPOSAL

The proposed development is for internal alterations to the existing State Heritage Place, demolition of the existing barbeque shelter and construction of a common room. The internal alterations comprise the following:

- Conversion of one bedroom in each cottage to a second bathroom;
- Updates to the existing bathroom;
- Updates to the existing kitchen whilst retaining the existing kitchen sink bench and woodfire cooker; and
- Internal alterations to the existing store/laundry.

The proposed common room is a communal building in the form of an open pavilion. Part of the building will be enclosed on three sides and will include the kitchen and a lounge area which can be enclosed on the fourth remaining side when not in use. Along the northern side of the building will be a verandah including a barbeque, fireplace and outdoor dining area.

There is no external material or refurbishment proposed to the State Heritage listed cottages.

In terms of land use, the cottages are currently used for tourist accommodation and therefore, no change in land use is proposed. The internal alterations will not increase the number of guest rooms available on the site with a maximum of three guest rooms provided per cottage.

As part of this development application, the accommodation will form part of a four day and three night fully guided small group bushwalking tour for fourteen guests. Each group will be greeted by the guides in Kingscote where they will be transported via private bus to a drop-off point at the beginning of the walking trail. The walks will typically operate all year round, and when in full operation, will run daily.

The guests are fully supported for the duration of the trip by two experienced guides, who guide the group along the trail during the day and manage all aspects of the accommodation in the evenings/mornings with the assistance of one additional support guide (with vehicle access). The accommodation is fully serviced and managed by the guides and support staff including cooking, cleaning and in-accommodation services. The daily operations of each camp is summarised below:

- Morning:
 - Guides up at 6.30am to prepare a shared breakfast and all lunches for the day
 - Breakfast is shared
 - Guides and guests pay a day pack and leave their luggage to be collected by Support Staff for transport to the next accommodation location



- One guide leaves with the group around 9.00 am to begin the days walking
- The second guide stays behind for an hour to assist Support Staff to perform all remaining cleaning duties and effectively turn over the accommodation and close down the buildings ready for the following group to arrive
- Support staff member performs shut-down procedure (gas off, lighting off etc.) before leaving and transfers all baggage to next overnight node
- Afternoon:
 - One guide leaves the group and goes ahead to open the accommodation 1 hour before the group arrives including preparing afternoon tea
 - Guests arrive in the afternoon and receive hut briefing on operational and safety matters
 - Guides prepare dinner and perform wine and food service
 - Guests have some time to themselves to shower, rest and/or socialise
 - Dinner is shared
 - Guides complete clean-up and basic overnight shut-down procedures.

Unlike the other nodes of accommodation which are subject to separate development applications, this accommodation will retain an additional function as tourist accommodation for individuals/groups to book separately without participating in the walking tours during the off-peak season. Accordingly, the fit out of the cottages has been designed to enable one of the rooms to function as a bedroom when being used by the AWC or as a living room when booked separately. This will result in a maximum of two guest rooms being available per cottage when being booked separately. The alternate furniture will be stored in the rear room of each cottage.

No changes to the existing access from Cape du Couedic Road or existing infrastructure (such as water and electricity supply and waste management) are proposed as part of this application other than connecting the new building into the existing waste water system.



4. ACHIEVING STRATEGIC PRIORITIES ON KANGAROO ISLAND

The existing Cape du Couedic Lighthouse Keepers' Cottages are situated adjacent the Kangaroo Island Wilderness Trail (KIWT) which has become a key focus of the South Australian Tourism Commission (SATC). Specifically, the SATC's Regional Visitor Strategy, lists the following priorities for Kangaroo Island:

- Foster the development of at least 120 new rooms and upgrading of at least 30 rooms (from 3 to 4-star) by 2020.
- Activate Kangaroo Island Wilderness Trail as a hero experience to foster other experience development and drive low season visitation.
- Work with government, other agencies and operators to encourage investment in experiences around coastal, health, wellbeing and the arts.
- Promote Kangaroo Island's brand essence of immersive nature and wildlife encounters and seasonal natural occurrences

The proposed development will upgrade the facilities available to guests by providing improved bathroom and kitchen facilities, refreshed furniture and an outdoor entertainment space currently limited to a barbeque shelter. In addition to improving these facilities it will support the use of this site as part of a fully guided walking experience showcasing the KIWT whilst allowing guests to appreciate the history of Kangaroo Island during their stay in the 1907 cottages.

The Kangaroo Island Development Plan State Strategic Setting (on page 12) states:

'It is expected that the Island will continue to develop as a pre-eminent sustainable, nature-based tourism destination, but there is also a need to provide opportunities in other tourism markets around the themes of outdoor adventure and leisure activities, the coast, niche food and wine products, heritage and culture. These markets should add depth to the Island's appeal as a visitor destination and encourage longer stays.'

The proposed improvements to the cottages and their integration with a KIWT bushwalking experience will reinforce the tourism market around these themes whilst supporting the image of Kangaroo Island as a pristine, nature-based tourism destination.

In our opinion, the proposed AWC experience will provide a much needed exclusive bushwalking and accommodation draw-card that will showcase the pristine natural and coastal environment of Kangaroo Island and will diversify the offerings for tourists. More specifically, the proposed upgrades to the existing Cape du Couedic Lighthouse Keepers' Cottages will also improve the experience of tourists who chose to stay at Cape du Couedic without bushwalking.



As a result, this accommodation delivers on a number of the strategic priorities developed by the South Australian Tourism Commission and within the Kangaroo Island Development Plan.

4.1 Relationship to Park Management Plan

The development is sited within the Flinders Chase National Park which is a reserve declared under the *National Parks and Wildlife Act 1972*. This Act requires that a Management Plan be prepared for such reserves which sets out the strategies intended to meet the objectives set out in the Act. The *Flinders Chase National Park, Kelly Hill Conservation Park, Ravine des Casoars Wilderness Protection Area and Cape Bouguer Wilderness Protection Area Management Plan (1999)* is this plan.

Section 10 of this Plan outlines the strategies for visitor management and infrastructure development within Flinders Chase National Park and details three zones which have been established to exclude areas of high conservation value from inappropriate development. These three zones are the;

- Major Development Zone, for major visitor facilities;
- Minor Development Zones for small scale visitor facilities (camping site, toilets, car parks, etc) and '*small scale, ecologically sensitive accommodations*'; and,
- Limited Access Zone where development should not occur.

The Cape du Couedic heritage precinct is identified as a Major Development Zone within Flinders Chase National Park and anticipates development that facilitates tourism provided it is sympathetic to the existing heritage buildings. The upgrade of such facilities is therefore aligned with the intent of this Zone.

The Management Plan also identified the need for a Heritage Conservation Plan which has been prepared. The proposed improvements to the State Heritage listed Cape du Couedic Lighthouse Keepers' Cottages will be undertaken in consultation with the State Heritage Unit (SHU) of the DEW as part of this development application to ensure the works align with the Heritage Conservation Plan. The applicant has contacted the SHU to commence these discussions.



5. PROCEDURAL MATTERS

5.1 Relevant Planning Authority

The *Development Regulations 2008* identify the State Commission Assessment Panel as the relevant authority (at clause 18, Schedule 10) of the following:

'Development for the purposes of tourism in those parts of the area of the Kangaroo Island Council defined in the relevant Development Plan as Coastal Conservation Zone or Conservation Zone.'

The proposed development is for the purposes of tourism and the subject land is situated within the Conservation Zone, identified with the Kangaroo Island Council Development Plan (consolidated 17 September 2015).

Accordingly, the State Commission Assessment Panel is the relevant authority pursuant to section 34(1)(b)(i) and (ii) of the *Development Act 1993* (supported by regulation 38(1) of the *Development Regulations 2008*).

5.2 Public Notification

Having regard to the procedural matters for the Conservation Zone, the following is identified as a Category 1 form of development:

'Tourist accommodation setback a minimum of 100 metres from land within an adjoining allotment used for farming or horticulture.'

The proposed improvements and common room are incidental to the existing use of the land as tourist accommodation. In addition, the Cape du Couedic site is more than 100 metres from any adjoining allotment and more than 100 metres from farming and horticulture.

In any event, in my opinion, the proposed development will not unreasonably impact on owners or occupiers of land in the locality and is of a minor nature only for the following reasons:

- The land in the vicinity is managed by DEW and there is no privately owned land within the vicinity of the development;
- The works to the State Heritage listed cottages will be entirely internal and will not be visible from those bypassing the site on Cape du Couedic Road;
- Due to the nature of the development, there will be no substantial change to the function or intensity of use of the cottages and the only tangible alteration for those external to the site is the additional common room; and
- The position and small scale of the proposed common room will limit views of the new building to those in the immediate vicinity of the site.



Therefore, in my opinion, the proposed development should be assessed as a Category 1 form of development pursuant to clause 2(g) of Schedule 9 of the *Development Regulations 2008* and no public consultation should be undertaken pursuant to section 38(2) of the *Development Act 1993*.

5.3 Referrals

Pursuant to Schedule 8 of the *Development Regulations 2008*, the referrals to the following state agencies are required as part of this application:

- State Heritage Unit (pursuant to clause 5(1) of Schedule 8); and
- Country Fire Service (CFS) (pursuant to clause 18 of Schedule 8) (note there is no clear exemption for existing tourist accommodation).

In addition to the above, the Applicant is liaising with the Coastal Protection Board (CPB) and will apply for any necessary Native Vegetation Clearance approvals. Notwithstanding this, no mandatory referrals are required to the CPB or Native Vegetation Council (NVC) pursuant to Schedule 8 of the *Development Regulations 2008* due to the following:

- The site is not on coastal land or rural land (referred to in the definition of coastal land); and
- The Kangaroo Island Council Development Plan does not contain a map showing an area of substantially intact native vegetation affecting the subject land.

As the proposed development is a DEW initiative and will be developed on a National Park, there will be an ongoing relationship and consultation with DEW during and after the development application process. In recognition of this, a letter from the Chief Executive of DEW, John Schutz is attached confirming DEW's support for the proposed development (Appendix D).

6. DEVELOPMENT ASSESSMENT

6.1 Relevant Policies

The Kangaroo Island Council Development Plan, consolidated on 17 September 2015, is the relevant planning instrument.

The subject land is located within Conservation Zone and is not within any Policy or Precinct Areas.

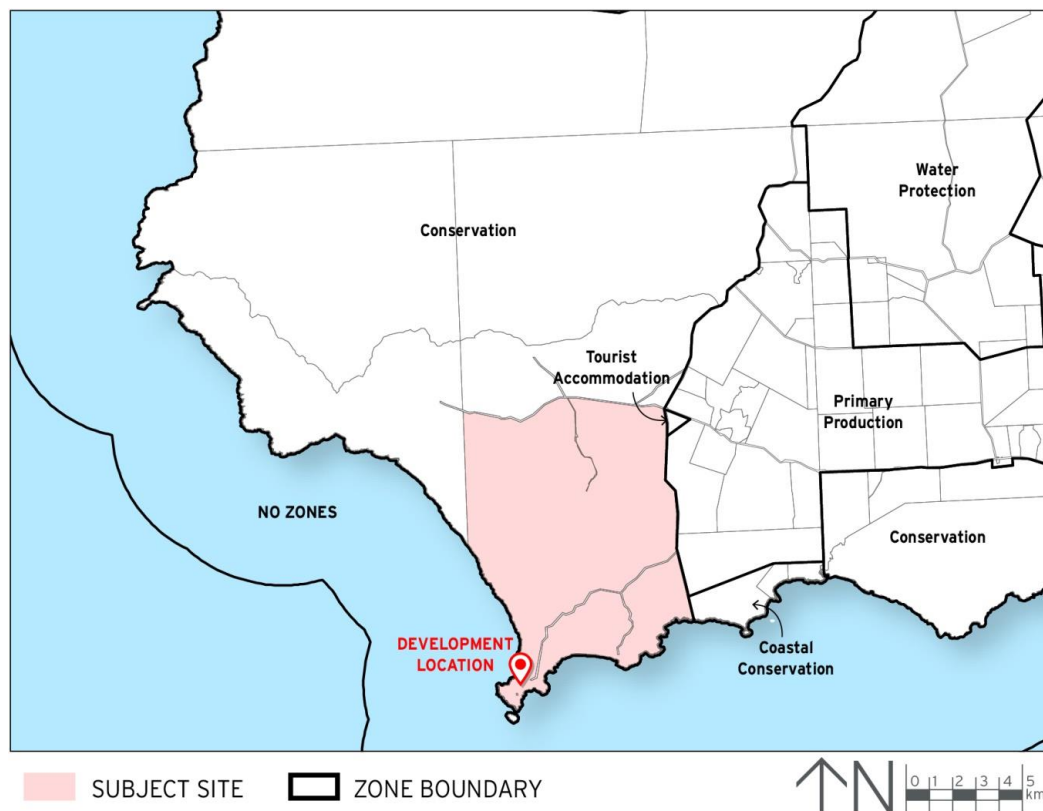


Figure 6.1 Zone Boundaries

The following provisions of the Kangaroo Island Council Development Plan are in our opinion, considered most relevant to an assessment of the proposed development.



Zone Section

Conservation Zone

Objectives: 1, 2 and 4

Principles of Development Control: 1, 3, 4, 5 and 6

General/Council Wide Section

Design and Appearance

Objectives: 1 and 2

Principles of Development Control: 1, 3,7 and 17

Heritage Places

Objectives: 1, 2 and 3

Principles of Development Control: 2, 3 and 4

Tourism Development

Objectives: 1, 2, 3, 4, 6, 7 and 8

Principles of Development Control: 2 and 15

Transportation and Access

Objective: 2

Principles of Development Control: 21, 22, 23, 27, 28 and 29

The assessment below considers the matters most relevant to the proposed development.

6.2 Land Use and Zoning

In terms of land use, the cottages are currently used for tourist accommodation and therefore, no change in land use is proposed. In addition, no increase in guest rooms will result from this development and therefore no assessment of the existing infrastructure, car parking or driveway has occurred.

Notwithstanding this, tourist accommodation is an envisaged form of development within the Conservation Zone and the proposed development is considered to be incidental to this use. Specifically, the proposed development will improve the outdoor entertainment area onsite better enabling tourists staying in the accommodation to absorb the natural and scenic surrounds.

In addition to the policies contained within the Conservation Zone, the desire to position tourist accommodation within existing heritage places is also evident within the following policies:

Tourism Development Objective 2: Tourism development that assists in the conservation, interpretation and public appreciation of significant natural and cultural features including State or local heritage places.



Tourism Development PDC 15: Where appropriate, tourism developments in areas outside townships and settlements should:

- (a) adapt and upgrade existing buildings of heritage value*
- (b) seek to improve conditions in disturbed or degraded areas on the site.*

The proposed development is considered to increase public exposure to the existing cottages by retaining it for use for individual groups or tourists as well as integrating it with a four day and three night bushwalking experience (i.e. attracting visitors that otherwise may not have stayed at this accommodation if not for the guided tour). In turn, the alterations and upgrades are considered to aid the conservation and public appreciation of a significant cultural feature such as the State Heritage listed Cape du Coeudic Lighthouse Keepers cottages in accordance with Tourism Development Objective 2 and PDC 15 above.

In the context of the broader AWC development, the integration of the Cape du Coeudic Lighthouse Keeper's cottages also provides an appreciation with the culture and European heritage of Kangaroo Island in contrast to the focus on nature at the other accommodation nodes.

6.3 Design and Appearance

The proposed development involves internal alterations to the existing buildings and an additional common room and outdoor entertainment area clustered with the existing buildings.

The internal alterations will not impact the external appearance of the buildings nor will it result in any alterations to the internal walls. On the contrary, it will be limited to altering the internal fit outs of the existing rooms by adding a bathroom and upgrading the existing bathroom, kitchen and storage arrangement. Accordingly, the primary change to the site is the construction of an additional building to create a communal common room space and outdoor entertainment area that is currently limited to a small barbeque shelter.

As the proposed building will be sited amongst three existing buildings, it will not impact the landscape or coastal views. In terms of siting, the proposed additional building will be assessed in relation to its impact on the setting of the heritage places.

The following policies are considered the most relevant to the design and appearance of the proposed works in the context of a State Heritage Place.

Design and Appearance Objective 1: Development of a high architectural standard that responds to and reinforces positive aspects of the local environment and built form.

Design and Appearance PDC 7: The external walls and roofs of buildings should not incorporate highly reflective materials which will result in glare.

Heritage Places Objective 1: The conservation of State and local heritage places.



Heritage Places Objective 2: The continued use, or adaptive re-use of State and local heritage places that supports the conservation of their cultural significance.

Heritage Places Objective 3: Conservation of the setting of State and local heritage places.

Heritage Places PDC 2: Development of a State or local heritage place should retain those elements contributing to its heritage value, which may include (but not be limited to):

- (a) principal elevations*
- (b) important vistas and views to and from the place*
- (c) setting and setbacks*
- (d) building materials*
- (e) outbuildings and walls*
- (f) trees and other landscaping elements*
- (g) access conditions (driveway form/width/material)*
- (h) architectural treatments*
- (i) the use of the place.*

(Underlining my emphasis)

The proposed new building will have natural timber and steel finishes that reinforce positive aspects of the local environment and avoids highly reflective materials in accordance with Design and Appearance Objective 1 and PDC 7. Its scale and open nature responds to its context adjacent State Heritage Places but is modern in contrast to ensure that it is not mistaken as part of the original heritage fabric of the site and maintain focus on the more prominent cottages.

The proposed development will result in internal updates to the existing State Heritage cottages that seek to conserve and improve the functionality of the cottages for their current tourist accommodation use by providing an additional larger, more functional bathroom. This is considered to be consistent with Heritage Places Objective 2 which anticipates the continued and adaptive re-use of State Heritage Places.

The proposed new building also seeks to limit its impact on the setting of the three cottages by achieving the following:

- The building will be situated between the Parndana and Karatta Lodges and will be setback from their primary façade to the internal 'village square';



- The scale of the building has been designed to be sympathetic with the two adjacent cottages with the roof height of the southern portion of the building aligning with the eave height of Parndana Lodge and the skillion roof of the outdoor entertaining area mimicking the roof pitch of the Karatta Lodge; and
- The design of the cottage of is modern in form to ensure it does not replicate the existing cottages or be interpreted as an original structure.

The proposed development prevents any alteration to the external appearance of the existing cottages and in turn protects the principal elevations, building materials and architectural treatments in accordance with PDC 2.

6.4 Infrastructure

The existing infrastructure onsite will be retained with some minor modifications required to accommodate the additional structure. These modifications will be limited to connecting the proposed kitchen into the existing waste water system and installing a swale adjacent the new building to prevent the entry of roof water falling to the ground from affecting the adjacent building. Given no substantial changes to these systems are proposed and stormwater will be managed in a manner that does not detrimentally impact the existing buildings or surrounds, no further assessment of the existing systems has been undertaken.

A waste water application will be lodged with the Kangaroo Island Council for approval and will be subject to more detailed design by a qualified plumber.



7. CONCLUSION

The proposed internal alterations to the existing tourist accommodation and construction of a common room is considered to be sited and designed to minimise their impact on the State Heritage Places and their setting. In addition, the upgrades to the building, including a second building, will continue to support the conservation and use of the buildings in manner that enables tourists to appreciate the European heritage of Cape du Couedic and maintain the important distinction between original and new.

Based on the assessment above, the proposed development is considered on balance to be consistent with the Development Plan and therefore warrants Development Plan Consent.

Character

The overall approach to the AWC guided walk is to deliver 3 nights and 3 distinct memories, in which architecture and site-planning marries with Place.

At Cape di Couedic, rather than guests remaining ensconced within individual lodges, the ambition here is for interaction with the *full* site – the lodges *and* their ‘village setting’.

To accommodate walking group needs a new structure, ‘The Commons’, is inserted; bathroom arrangements adjusted; and a refreshing of lodge fitout is proposed.

The insertion of the Commons acknowledges highly orthogonal precinct site planning and its heritage structures.

Site planning

The arrival sequence: is devised around ‘wow’:

1. The lodges are not visible on near approach from the west, being hidden by a road-edging low dune, but
2. On ascent, after a long days march with the westward sea and wind ‘at us’, the lodges burst into view – a very near proximity.
3. Final approach, down the existing driveway is on axis with the lighthouse, and...
4. We arrive centrally at the ‘Village Square’.

At Cape du Couedic, guests will use the site as actors in a ‘theatre set’, assembling themselves in different locales according to opportunities that evening and morning ‘ritual’ sequences demand – on verandahs facing each other, in a Square-connecting open pavilion, around a fire-ring, retiring to their very solid sleeping lodges – all activity focussed around the Village Square.

The open pavilion, ‘The Commons’ sits between and behind the front stone facades of Karatta and Parndana Lodges. It is set closer to Karatta, to draw in northern sun, but also for overall balance, considerate of the position of Troubridge Lodge opposite. It will enable the gathering of a group of 16 people indoors and out, in both lounging and dining modes

Architecture and fitout

Materials

In the lodges, there is no new external material or refurbishment proposed.

Commons will be of lightweight, natural and largely ephemeral materials, seeking to tone with the lodges, whilst contrasting their ‘weight’.

Little things

In the lodges, the existing kitchen sink bench and woodfire cooker are retained. New fitout and furniture will be contemporary.

Fitout of The Commons will be robust, and, in the case of the lounge, bright, drawing form eth vermilion red of the lighthouse cap.

Cape du Couedic dual use

In the ‘off-season’ Cape du Couedic will continue to operate in its existing ‘holiday rental’ mode. The open pavilion of The Commons, replete with polished concrete table, fireplace and bbq will remain accessible – but the AWC lounge and kitchen zone will be shuttered away in its solid ‘container’.

Fitout has been devised so that this dual use ('public' & AWC) can be accommodating, feeling 'right' in both modes, with no significant architectural/ fitout redundancies.

Stores are incorporated to accommodate furniture, kitchen equipment and linen for the alternate lodge uses.

Siteworks & landscape

No landscape works are proposed at Cape du Couedic, except for the removal of shrubs located between Karatta and Parndana Lodges to facilitate the siting of 'the Commons'.

Bushfire

No change to existing arrangements.

Servicing

No change to existing arrangements.

Roofwater

Roofwater is not to be harvested (existing roof areas and storage tanks are adequate for site use).

Drainage of roofwater from The Commons roof will take advantage of the alluvial soil profile, with roofwater falling to a drainage swale/ shallow soakage trench along the rear of The Commons wall-line, 450mm wide x 300mm deep, lined with geotextile fabric and filled and finished with found site stone.

Construction methodology

The Lodges

Work is devised for minimum intervention of existing fabric; and will be carried out in accordance with Heritage SA direction.

Any repairs and maintenance will also be by consultation with Heritage SA, with reference to current conservation management plans.

The Commons

The high fitout component including kitchen will be a portable. The screened open pavilion will be prefabricated.

Both elements will be capable of ready future demountability.

tropo architects 10.10.18



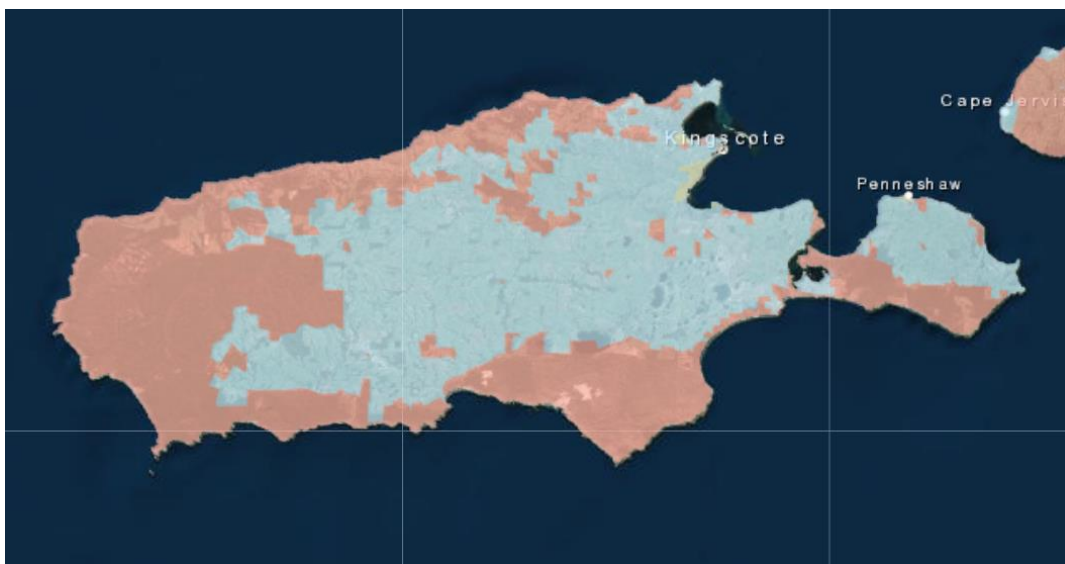
Australian Walking Company KI Development Application.

The proposed tourism development on Kangaroo Island by the Australian Walking Company (AWC) involves the building of multiple dwellings (for overnight stays) and additional support structures (storage sheds, kitchens and shared space) for tourist comfort and enjoyment whilst walking sections of the Kangaroo Island Wilderness Trail (KIWT).

The proposal includes structures to be built within Flinders Chase National Park at the following sites

- Sanderson Bay
- Cape Du Couedic
- Sandy Creek

Large portions of Kangaroo Island (including the proposed sites within Flinders Chase National Park) have been declared as High Bushfire risk (refer Map1) and require certain considerations for development within High Bushfire risk areas.



Map 1 – Bushfire Protection areas of Kangaroo Island

- Pink - High
- Blue – Medium



Development Application Requirements

Applications for Development Plan Consent are assessed against the planning policies contained in the Kangaroo Island Council Development Plan.

Proposals for new dwellings within High Bushfire Protection areas have a mandatory referral to the Country Fire Service (CFS) for advice on the degree of difficulty in protecting the building from a bushfire and assessed against the provisions of the Ministers Code: *Undertaking development in Bushfire Protection Areas*.

All new dwellings or tourist accommodation will be assessed for compliance against the following criteria:

- must have a dedicated firefighting water supply of at least 22,000 litres
- ensure that gaps between the dwelling floor and the ground are enclosed to prevent burning debris from entering
- be set back 20 metres from flammable or combustible vegetation
- be located and designed to minimise risk from bushfires
- have access roads and tracks that are appropriately designed and built for entry and exit of vehicles, including fire fighting vehicles during a fire.

In addition, new buildings will be assessed against the provisions of the building rules to ensure they are designed and constructed to provide an appropriate level of protection ranging from just sparks and embers up to direct flame contact.

The Building Code of Australia Volumes 1 and 2 (BCA) and the *Minister's Specification SA 78 Additional requirements in designated bushfire prone areas* outline the construction requirements for the level of Bushfire risk.

This requires a site assessment in accordance with AS 3959 – *Construction of buildings in bushfire prone areas* to identify the expected level of bushfire attack (BAL). This assessment is submitted to the council or private certifier as part of the application for building rules consent.



Proposed AWC Development Application

The proposed development application will include multiple overnight accommodation tents “sleeping pods” (approximately 7 at Sandy Creek and Sanderson Bay) and support structures including shared space facilities “Longhouse” for kitchen and dining rooms for all three sites.

The development will also include some additional walking trails for enjoyment of the spectacular scenery of the Kangaroo Island Wilderness and coastline and access tracks to built assets.

AWC acknowledge that the proposed development is within remote areas of Kangaroo Island and within a High Bushfire Protection area.

In review of the following documents;

- Ministers Code *Undertaking development in Bushfire Protection Areas* and
- *Minister’s Specification SA 78 Additional requirements in designated bushfire prone area*
- Attached BAL reports

It has been identified that the proposed development would potentially have some environmental and aesthetic impacts (via some native vegetation clearance) to achieve the required;

- site access and
- setback distances (from classified vegetation) requirements

Therefore, AWC have requested consideration to vary the Ministers Code and Specifications by providing alternative solutions based on the proposed new procedures by Department for Environment and Water (DEW) and in line with the performance criteria of Australian Building Codes Board (ABCB) Design and Construction of Community Bushfire Refuges.



Draft Building Requirements Procedure

Department for Environment and Water (DEW) have developed a **Draft procedure for Building requirements** on land under the care and control of the *Minister for Sustainability, Environment and Conservation*, under the *National Parks and Wildlife Act 1972*, the *Wilderness Protection Act 1992* or the *Crown land Management Act 2009*.

The draft procedures have been designed to ensure the safety of employees, visitors, contractors and lessees located in bushfire prone areas and assist with mitigating bushfire risks and minimize the possible impacts in the workplace.

The objective of the procedure is to provide guidance on;

- managing the safety of people working, visiting or participating in events
- guidance on when a workplace should be closed or modify operations during heightened fire danger or during a bushfire event
- determining if workplace suitable as place of last resort
- assisting worksite managers implement Government policy

The procedure also considers risk mitigation strategies that determine if the existing or future proposed building locations can be considered a safe place to remain during a bushfire event.

The procedure follows the principles, general guidelines and performance criteria of the following documents;

- Risk Management Standards AS/NZS ISO 31000:2009
- Australian Building Codes Board (ABCB)
 - Design and Construction of Community Bushfire Refuges
 - Private Bushfire Shelters



Performance Based Solutions

Performance based solutions consider the site-specific risks and allow businesses to provide an alternative option whilst still meeting the performance criteria of the *ABCB Design and Construction of Community Bushfire Refuges*.

AWC propose the solutions below to support the Development Application. These proposed solutions have considered the following issues;

- All sleeping pods, guide huts and lookouts constructed to general bushfire risk standards
- AWC accept that buildings constructed to general bushfire risk will burn during a bushfire
- Each site has a refuge building with capacity to support 17 people (14 Tourists, 2 Guides, 1 support staff)
- Refuge building to be constructed to determined BAL
- Cape Du Couedic is the only site with suitable access for fire vehicles
- Fuels adjacent to each site will have fast moving fires with short residence time

Refuge

- Option 1 – Guide Pod built as the “refuge” area
- Option 2 – Additional refuge shelter built
- Built to identified BAL ratings
- Construction Materials won’t negatively affect interior air toxicity
- Ventilation provided
- Floor area minimum 0.75 sq/m per person
- Volume minimum 1.2 cubic metre per person (enough air for 60 minutes)
- 10m minimum separation between refuge and adjacent dwellings

Refuge Location

- The refuge “Guide Pod or additional structure” will be in lower fuel areas with selective clearing of inner and outer protection zones applied (subject to native vegetation clearance approval)
- Consideration DEW A and B zones in Flinders Chase Fire Management Plan



Last Resort

- “Open Space”
 - Options include the cliff sheltered areas and beaches at Sanderson Bay and beaches at Sandy Creek
 - Within 2-minute walk
 - Large enough for 17 people
 - Prevent flame contact, material ignition and radiant heat levels of 2kW/sq/m
 - Additional track requirements must be considered.

Access and Egress

- Remote access and locations of sites not suitable for fire trucks (except Cape Du Couedic)
- Limited public access (on High fire danger days due to DEW park Closure Policy)
- Restricted access on Sanderson Track (Public Land)
- Unlikely conflicts with Emergency vehicles
- Public Roads support Cape Du Couedic and Sandy Creek
- AWC to implement support tracks that will support smaller ATV to assist with evacuation (if required) to Public Roads
- Good access via pedestrian paths (minimum clear width of 1m) from “Sleeping Pods” to refuge

Water Supply and storage

- Adequate supply and storage available at each site for pre-suppression and mop up
- Tanks of fire resistant material
- Fittings and hose reels provide adequate reach and coverage around refuge structures
- Consideration for sprinkler system on refuge
- No access for fire trucks

Utilities

- No electricity (except existing infrastructure at Cape Du Couedic)
- Gas cylinders directed away from combustible material



Bushfire Site Management Plan

- Develop a comprehensive plan for each site that includes
 - Risk assessment
 - Communications Plan
 - Identify roles and responsibilities
 - Evacuation Plan
 - Training
 - Equipment check
 - Annual audit
 - Monitor and review

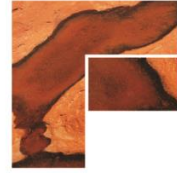
The implementation of the solutions highlighted above will provide a safe operating environment for clients and staff enjoying the KIWT and using the AWC facilities.

Disclaimer

It is acknowledged that the risk to life and property from a bushfire event is significant and Australia has experienced this on many occasions over recent decades.

It must be noted that extreme fire weather conditions may create unpredictable fire behaviour and therefore it is not possible to remove all potential impacts from bushfires or guarantee that occupation of a refuge built in accordance with DEW procedures and in accordance with the ABCB handbooks will guarantee that a building will survive or eliminate the risk of serious injury or fatality.

The ABCB acknowledges that content of their handbooks may not meet the specific needs of people with a disability, respiratory or cardiovascular illnesses, children or the aged and strongly recommends that people in these categories are appropriately evacuated to safer places.



FYFE

APPENDIX F

INDICATIVE BUSHFIRE ATTACK LEVEL (BAL) ASSESSMENT REPORT PREPARED BY SA BUSHFIRE SOLUTIONS



**AS 3959
"INDICATIVE" BUSHFIRE ATTACK LEVEL (BAL)
ASSESSMENT REPORT**

"Cape Du Couedic"

Customer Details	
Applicants Name	Troppo Architects
Email	ryan.horsnell@troppo.com.au
Phone	82329696

Property Details	
Address	Flinders Chase National Park Cape Du Couedic
Lot Number	D38340Q55
Municipality	Kangaroo Island
Bushfire Protection Area	High

Report Details	
Report / Job Number	BAL 012.2
Report Version	1.0
Assessment Date	28/8/2018
Report Date	11/9/2018
Assessors Name	Brett Stephens
Assessor Phone	0427604253

BAL Summary				
Plot	Vegetation Classification	Effective Slope	Separation Distance (m)	BAL
1	Class C Shrubland	Level	5m	FZ
2	Excluded 2.2.3.2 (e)	Level	5m	FZ

Determined Bushfire Attack Level (BAL)

The determined Bushfire Attack Level (highest BAL) for the site / proposed development has been determined in accordance with clause 2.2.6 of AS 3959-2009.

Determined BAL	BAL- FZ
-----------------------	----------------



BAL Assessment Report

The BAL assessment has been completed following an onsite visit and Fuel Hazard assessments on the property as per AS 3959-2009 Construction of Buildings in Bushfire Prone Areas.

All vegetation within 100m of the site / proposed developments was classified in accordance with Clause 2.2.3 of AS 3959-2009. Vegetation classification was also made with consideration for future growth and revegetation and based on worst case scenarios.

The AS 3959-2009 provides a relevant fire danger index (FDI) in accordance with agency determined agreements, in SA this is FDI 80 (Table 2.1).

Comments:

This is an indicative BAL assessment for the proposed new structures at Cape Du Couedic and any alterations to existing structures. As the exact build location has not been agreed or approved (although we don't expect significant change from the attached maps), we completed the inspection with a view to providing the client an opportunity to consider potential Bushfire risk on the proposed infrastructure and an opportunity to review and decide on options that may assist reduce the risk prior to submitting the development application.

This report does not refer to matters specifically referred to in the Ministers Code "Undertaking development in Bushfire Protection Areas" as these considerations will be addressed in the development application following inspection from Country Fire Service (CFS).



Disclaimer Statement:

It must be noted that extreme fire weather conditions may create unpredictable fire behaviour and therefore it is impossible to remove all potential impacts from bushfires and guarantee that a building will survive any bushfire event.

The current fuel loads and vegetation management cannot be guaranteed not to change in the future.

I have taken all reasonable steps to ensure that the information provided in this assessment is accurate and reflects the conditions on and around the site and allotment on the date of this assessment. I cannot guarantee the bushfire risks will not change on neighboring properties in the future.

Signed:

A handwritten signature in blue ink, appearing to read 'BASSEL', is displayed on a light green rectangular background.

11 September 2018



1 Proposed Site Location Plan "Cape du Couedic"



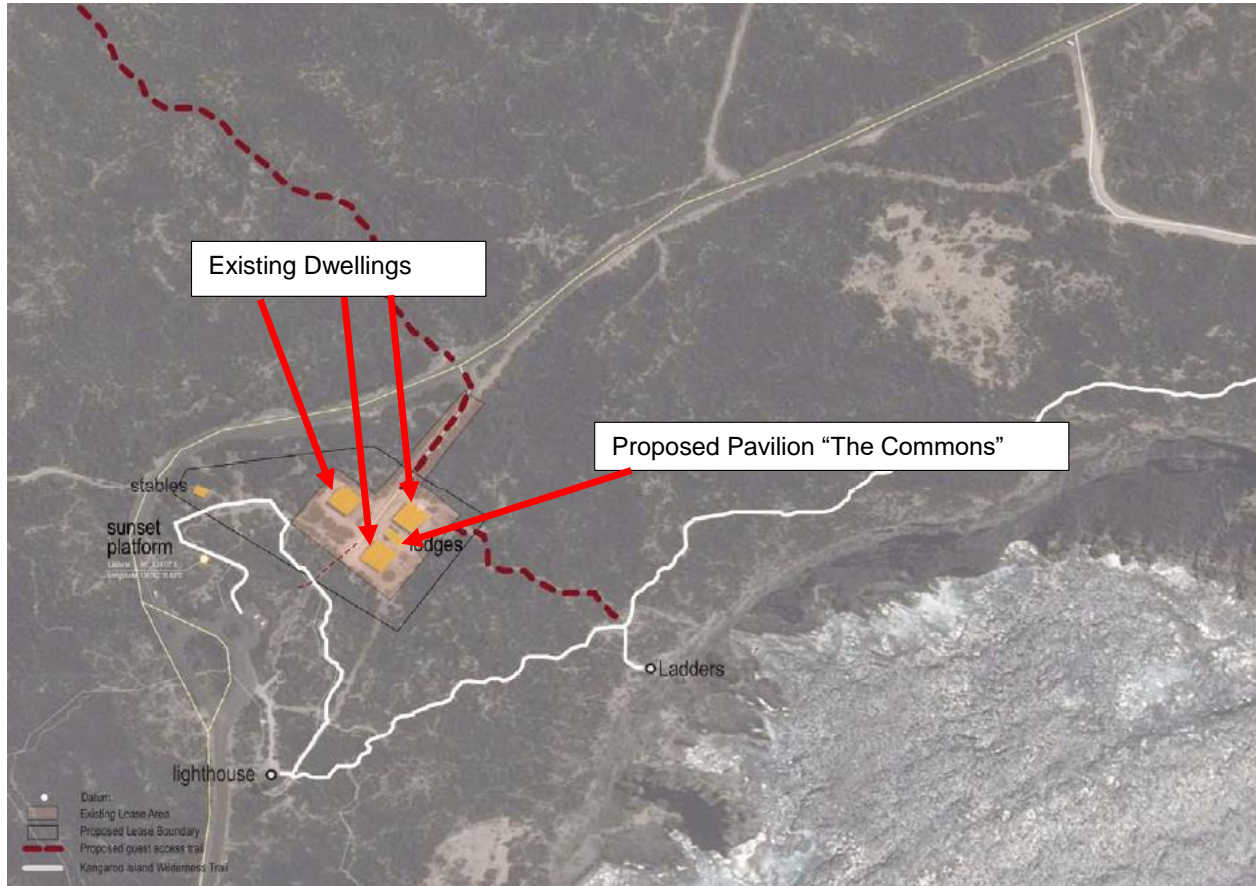
KANGAROO ISLAND WALK
SITES MAP
AUG 2018



tropo



1.1 Proposed Construction Site Location Plan "Cape Du Couedic"





2 Site Assessment showing the vegetation within 100m and 150m radius.





3 Classified vegetation plots within the 100m radius of the proposed dwelling (Centered for proposed “The Commons”).





Assessment of the vegetation within 100m in all directions.

Vegetation classification (see Table 2.3)	Plot 1	Plot 2	Plot 3	Plot 4	Plot 5
Group A Forest					
Group B Woodland					
Group C Shrub-land	✓				
Group D Scrub					
Group E Mallee/Mulga					
Group F Rainforest					
Group G Grassland					
Exclusions (where applicable)	Circle relevant paragraph descriptor from clause 2.2.3.2.				
	(b) (c) (d) (e) (f)	(b) (c) (d) (e) (f)	(b) (c) (d) (e) (f)	(b) (c) (d) (e) (f)	(b) (c) (d) (e) (f)
Distance of the site from classified vegetation (see clause 2.2.4)					
Distance to classified vegetation	Show distances in meters				
	5m				
Determine the effective slope of land under the classified vegetation					
Effective slope	Upslope				
	Upslope/0°	Upslope/0°	Upslope/0°	Upslope/0°	Upslope/0°
Slope under the classified vegetation	Downslope				
	>0 to 5 ✓	>0 to 5 ✓	>0 to 5	>0 to 5	>0 to 5
	>5 to 10	>5 to 10	>5 to 10	>5 to 10	>5 to 10
	>10 to 15	>10 to 15	>10 to 15	>10 to 15	>10 to 15
	>15 to 20	>15 to 20	>15 to 20	>15 to 20	>10 to 15
	>20	>20	>30	>20	>15 to 20
BAL value for each side of the site	FZ	Low			





5 Photos of Classified Vegetation

Plot	1	Classification or Exclusion Clause	Class C Shrubland
<i>Photo ID: 1</i>		<i>Photo ID: 2</i>	

Plot	1	Classification or Exclusion Clause	Class C Shrubland
<i>Photo ID: 3</i>		<i>Photo ID: 4</i>	



Plot	2	Classification or Exclusion Clause	Excluded 2.2.3.2 (e)
 A photograph showing a gravel road winding through a dense field of green bushes and shrubs. In the distance, a building with a chimney is visible under a blue sky with scattered clouds.		 A photograph of a long, single-story building with a stone or brick facade and a dark roof. The building has several chimneys and is situated on a large, flat, light-colored gravel or dirt area. The sky is blue with light clouds.	
<p><i>Photo ID: 5</i></p>		<p><i>Photo ID: 6</i></p>	



6 Location Map of photos





7 Reducing BAL Options

The indicative BAL rating for the proposed development (based on specified location) is BAL FZ, noting that this was from the plot 1 vegetation based on a minimal setback of 5m.

Options to reduce the BAL include

- Increasing the setback distance between the construction and the vegetation.
- Undertake Actual Fuel Hazard sampling for the site

Table B2 *Vegetation Classification and Fuel Loads* of the AS3959-2009 provides indicative Surface and Overall loads in Tonnes per hectare (t/ha). We found these to be over exaggerated and not representative of the actual (and potential) fuel loads at the site.

We completed fuel hazard assessments of the representative vegetation in and adjacent to the proposed development and determined appropriate fuel loads (refer table 1).

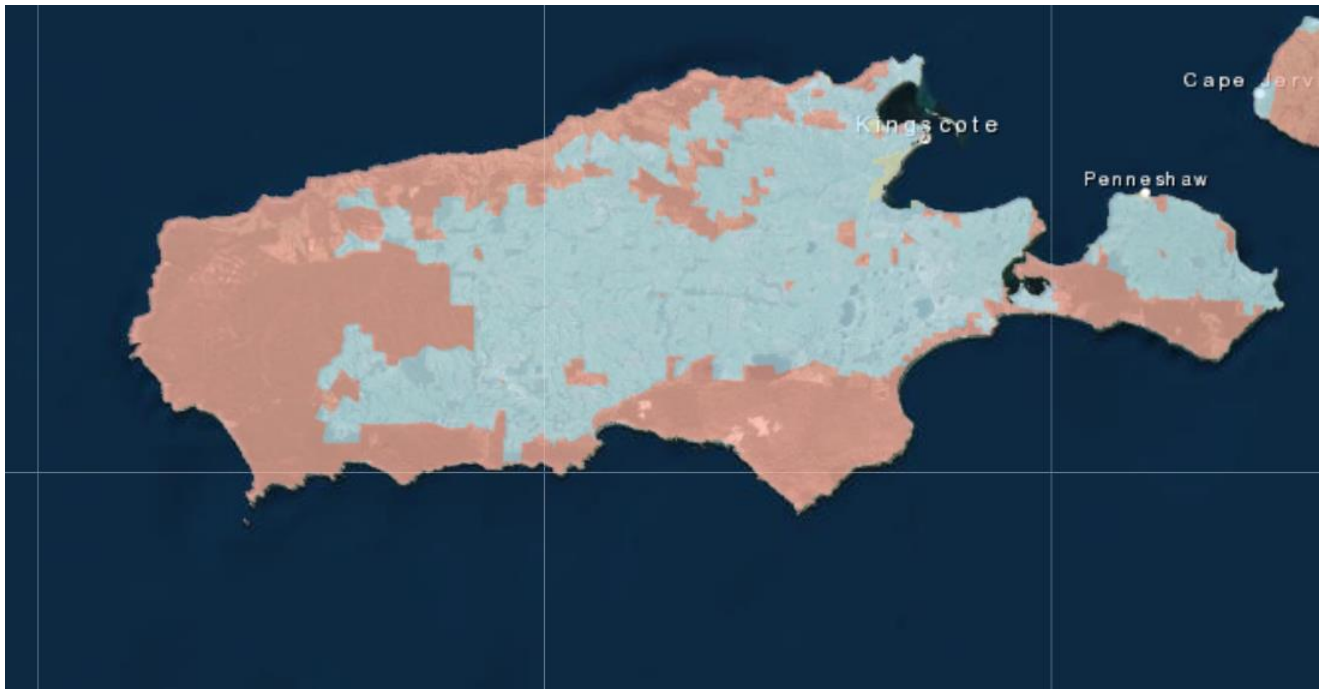
Our calculations below (refer Table 1) are based on the onsite fuel hazard assessments with an FDI of 120 and the potential BAL ratings can be compared with increased setback distances for consideration.

Table 1

Vegetation classification (see clause 2.2.3)	AS3959-2009 Surface Fuel load (t/ha)	AS3959-2009 Overall Fuel load (t/ha)	Setback distance	Current BAL	Adjusted Surface Fuel load (t/ha)	Adjusted Overall Fuel load (t/ha)	Setback Distance	Revised BAL
Shrubland	15	15	5	FZ	2	8	6	40
					2	8	7	29
					2	8	11	19
					2	8	15	12.5



Appendix 1 Property Location and highlighted High bushfire risk areas (pink) adjacent to Medium Bushfire risk areas (blue) for Kangaroo Island.





Government of South Australia

Department for Environment
and Water

Chief Executive

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Adelaide SA 5000

GPO Box 1047

Adelaide SA 5001

Australia

Ph: +61 8 8204 9323

www.environment.sa.gov.au

Date: 3/October 2018

To Whom It May Concern

The Department for Environment and Water (DEW) would like to advise of their full support to three development applications by the Australian Walking Company Pty Ltd (AWC) for the development of tourist accommodation along the Kangaroo Island Wilderness Trail (KIWT) in Flinders Chase National Park.

The development of a multi-day walking trail was identified by the South Australian Tourism Commission (SATC) as a critical need for the development of the tourism industry on Kangaroo Island and to compete with nature-based destinations worldwide. In 2018, a 64 kilometre trail through Flinders Chase National Park and the Kelly Hill Conservation Park was opened to the public.

To improve the diversity of accommodation and guided walking experiences along the trail an opportunity was presented to the private sector, through an expression of interest process, for the development of eco-sensitive accommodation and tours. The AWC was selected as the preferred applicant due to their national and international reputation for delivering ecologically sustainable construction and operation of tourism accommodation that complements walking trail experiences.

AWC's development proposals encompass small-scale tourism development within the Flinders Chase National Park which is administered by DEW. I can confirm the proposals align with the intent of the recent amendments to the Park Management Plan that facilitate the development of small scale ecologically sensitive accommodation for trail walkers.

The proponents have consulted closely with the Department over the last 18 months to develop the proposals and they are considered to be consistent with the State Government Eco-Tourism policy objectives. The AWC proposals have the Department's full support.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'John Schutz', written over a circular stamp.

John Schutz

CHIEF EXECUTIVE

DEVELOPMENT ASSESSMENT SERVICE

Your Ref: 520/L007/18
Our Ref: Kangaroo Island DA
Please refer to: 20190416-03lb

16 April 2019

State Commission Assessment Panel
GPO Box 1815
ADELAIDE SA 5001

ATTN: J WOOD

Dear Jeremy,

**RE: DEVELOPMENT APPLICATION (PLANNING ASSESSMENT) – AUSTRALIAN WALKING COMPANY –
CAPE DU COUEDIC LIGHTHOUSE KEEPERS COTTAGES, FLINDERS CHASE**

Scope:

Construction of tourism accommodation (comprising internal alterations to existing state heritage Cape du Couedic Lighthouse keepers' Cottages, construction of common room) in association with the Kangaroo Island Wilderness Trail.

Pursuant to Development Regulations 2008 (clause 18 of Schedule 8), a referral to SA Country Fire Service (SA CFS) is required, for direction on dwellings, tourist accommodation and other habitable buildings.

Relevant Supporting Documentation:

- Kangaroo Island Wilderness Trail Accommodation Planning Statement; Cape du Couedic, Flinders Chase National Park. Prepared by FYFE Pty Ltd dated 4/11/2018.
- Minister's Code 2009 "Undertaking development in Bushfire Protection Areas" (as amended October 2012) as published under Regulation 106 of the *Development Regulations 2008* applies.
- Kangaroo Island Council Development Plan (Consolidated 17 September 2015), Objectives and Principles of Development Control for Hazards (Bushfire):
 - Objectives: 1, 2, 3, and 8
 - Principles of Development Control: 1 (a), 1 (b), 2, 6, 7, 8 (a-e), 9 (a-c), and 11
- Response to referrals – DA 520/L007/18 Internal Alterations to existing buildings and construction of common room at Cape du Couedic. Prepared by FYFE Pty Ltd dated 7/03/2019.

The proposed development is located within an area that is categorised as a **HIGH** Bushfire Protection Area in the council development plan.

Thank you for giving SA CFS the opportunity to provide you with feedback on your response to our referral response. SA CFS has reviewed your response and is satisfied that the information provided has addressed the concerns raised in our referral response dated 17 January 2019 and has revised our original response as follows:

Locality/Background:

Kangaroo Island and in particular Flinders Chase National Park has a history of large, and depending on the weather and environmental conditions, uncontrollable bush fires.



The site will be serviced by the Western Districts and Parndana fire stations, these stations are staffed by volunteers and any response is subject to volunteer availability at any given time, and dependent upon other fire events occurring in the area as well as safe access to the site. Due to the location of these stations, response times to fires in this area may be extended in excess of 45 minutes once mobile.

There is a lack of reticulated water in the area. Static fire water tanks for both bush fire and building fires will be required to assist in effective Fire Service intervention.

There is a lack of reliable communication networks to facilitate the early warning and evacuation of participants on the trail and in residence at proposed accommodation.

The vegetation and landscape varies greatly across the Flinders Chase National Park, as it does the across the proposed areas for development in this proposal including:

Coastal heath, coastal mallee woodland, open Eucalypt forest, karst landscapes, ephemeral lakes and swamps.

SITING

Minister's Code 2009 "Undertaking development in Bushfire Protection Areas" (as amended October 2012) Part 2.3.2 describes the requirements for buildings to be sited away from areas that pose an unacceptable bushfire risk. This includes areas with rugged terrain or hazardous vegetation.

The siting proposed for tourist accommodation, presents an extreme risk, due to the proximity to nearby safer places, lack of safe access and hazardous vegetation.

SA CFS acknowledges the site has vegetation management plan in place and nominates a last resort refuge (Admirals Arch). However the overall risk remains and will require mitigation measures to be put in place.

The applicant & operators shall develop an Operational Management Plan which will ensure that staff and guests alike are not placed at any unnecessary risk through restricting operations and evacuating from the site prior to elevated fire conditions. In addition, the applicant & operators shall formulate, practice and maintain an Emergency Response Plan that addresses the risk posed if staff and guests are not removed from the site prior to a bushfire event, given the extreme risks that this remote location presents. Please refer to conclusion for more information.

ACCESS

The existing cottages are located approximately 17km south of the Flinders Chase Visitor Centre, is serviced by an all weather public road.

SA CFS acknowledges the existing access road satisfies the relevant PDC and Ministers Code to provide safe and convenient access for public and fire fighting vehicles in the event of an emergency.

WATER SUPPLY

The proposal includes an existing static water supply (quantity unknown) and an application for additional 95,000 Litres (subject to DA 520/V009/18); located within the fuel reduced zone. However, the quantity dedicated to fire fighting water is not disclosed.

A dedicated fire fighting water supply, pumping system, pipe-work and fire-fighting hose(s) will allow greater opportunity for the building to withstand the fire front, by providing pre wetting, extinguishment of embers spotting forward of the fire front and residual burning after the fire front; or in prevention of a fire spreading from the site as a result of the development and human activities.

Whilst pump systems can be operated automatically and fire hose reels relatively easy to operate, SA CFS recommends a maintenance and training regime be included in bushfire survival and emergency response plans.

CFS Mission

To protect life, property and the environment from fire and other emergencies whilst protecting and supporting our personnel and continuously improving.

SA CFS further recommends a fit for purpose, automatic internal fire sprinkler system for the purposes of providing added protection to the building and spread of fire to the surrounding areas as a result of the development and human activities.

SA CFS provides the following as conditions of consent for the development:

Minister's Code 2009 "Undertaking development in Bushfire Protection Areas" (as amended October 2012) Part 2.3.4.1 prescribes the mandatory provision of a dedicated and accessible water supply to be made available at all times for fire-fighting.

Ministers Specification SA78 provides the technical details of the dedicated water supply for bushfire fighting for the bushfire zone. The dedicated bushfire fighting water supply shall also incorporate the installation of a pumping system, pipe-work and fire-fighting hose(s) in accordance with Minister's Specification SA78 as follows:

- A minimum supply of 22,000 litres of water shall be available at all times for bushfire fighting purposes.
- The water storage facility (and any support structure) shall be constructed of non-combustible material.
- The dedicated fire-fighting water supply shall be pressurised by a pump that has –
 - i. A minimum inlet diameter of 38mm, AND
 - ii. Is powered by a petrol or diesel engine with a power rating of at least 3.7kW (5hp), OR
 - iii. A pumping system that operates independently of mains electricity and is capable of pressurising the water for fire-fighting purposes.
- The dedicated fire-fighting water supply pump shall be located at or adjacent to the habitable building to ensure occupants safety when operating the pump during a bushfire. An 'Operations Instruction Procedure' shall be located with the pump control panel.
- The fire-fighting pump and any flexible connections to the water supply shall be protected by a non-combustible cover that allows adequate air ventilation for efficient pump operation.
- All bushfire fighting water pipes and connections between the water storage facility and a pump shall be no smaller in diameter than the diameter of the pump inlet.
- All non-metal water supply pipes for bushfire fighting purposes (other than flexible connections and hoses for fire-fighting) shall be buried below ground to a minimum depth of 300mm with no non-metal parts above ground level.
- A fire-fighting hose (or hoses) shall be located so that all parts of the building are within reach of the nozzle end of the hose and if more than one hose is required they should be positioned to provide maximum coverage of the building and surrounds (i.e. at opposite ends of the habitable building).
- All fire-fighting hoses shall be capable of withstanding the pressures of the supplied water.
- All fire-fighting hoses shall be of reinforced construction manufactured in accordance with AS 2620 or AS 1221.
- All fire-fighting hoses shall have a minimum nominal internal diameter of 18mm and a maximum length of 36 metres.
- All fire-fighting hoses shall have an adjustable metal nozzle, or an adjustable PVC nozzle manufactured in accordance with AS 1221.

VEGETATION

The proposal details existing vegetation management within 5-6 metres of the buildings with no additional clearance to vegetation being proposed.

An adequate vegetation management zone, will address the relevant PDCs, the bushfire building standards for buildings and Ministers Code for developing in bushfire prone areas. It will also provide valuable protection for the building, reducing the impact of flame contact and provide an environment outside the building, that may improve tenability to the occupants to proceed to evacuation.

SA CFS provides the following as recommendations for the development:

CFS Mission

To protect life, property and the environment from fire and other emergencies whilst protecting and supporting our personnel and continuously improving.

Minister's Code 2009 "Undertaking development in Bushfire Protection Areas" (as amended October 2012) Part 2.3.5 mandates that landscaping shall include Bushfire Protection features that will prevent or inhibit the spread of bushfire and minimise the risk to life and/or damage to buildings and property.

- A vegetation management zone (VMZ) shall be established and maintained within 20 metres of the building as follows:
 - o The number of trees and understorey plants existing and to be established within the VMZ shall be reduced and maintained such that when considered overall a maximum coverage of 50% is attained, and so that the leaf area of shrubs is not continuous. Careful selection of the vegetation will permit the 'clumping' of shrubs where desirable, for diversity, and privacy and yet achieve the 'overall maximum coverage of 50%'.
 - o No understorey vegetation within 2 metre of the habitable building (understorey is defined as plants and bushes up to 2 metres in height).
 - o The VMZ shall be maintained to be free of accumulated dead vegetation.

CONCLUSION

SA CFS understands the importance of development of the tourism industry on Kangaroo Island and finding balance between ecotourism and meeting the bushfire provisions can be problematic. However consideration must be given to the essential bushfire provisions in order to protect the life of potential occupants, and fire fighting personnel in the event of a bushfire.

Summary of outcomes negotiated and proposed by AWC are accepted by SA CFS as follows:

- A dedicated fire fighting water supply, pumping system, pipe-work and fire-fighting hose(s) in accordance with Ministers Specification SA78.
- A vegetation management zone (VMZ) shall be established and maintained within 20 metres of the building.
- The applicant & operators shall formulate, practice and maintain an Emergency Response Plan that addresses the extreme risk associated this remote location presents, incorporating the following:
 - o Emergency Communication
 - o Evacuation options and risk mitigation measures as a result of the reduced access proposed and the increased evacuation times that may be experienced
 - o Emergency response training & regular drills
 - o Operating hours and restrictions on days of extreme weather or bushfire events

Compliance with the fire protection requirements is not a guarantee the habitable building will not burn, but its intent is to provide a 'measure of protection' from the approach, impact and passing of a bushfire.

Should there be any need for further information, please contact the undersigned at the Development Assessment Service on (08) 8115 3372.

Yours sincerely,



LEAH BERTHOLINI

BUSHFIRE SAFETY OFFICER

DEVELOPMENT ASSESSMENT SERVICE

cc: Fyfe Pty Ltd, Michael Osborn
Australian Walking Company; and
Dept. Environment & Water, John O'Malley

CFS Mission

To protect life, property and the environment from fire and other emergencies whilst protecting and supporting our personnel and continuously improving.



Ref: CPB/138/18
15 January 2019

State Commission Assessment Panel
Att: Simon Neldner

BY EMAIL

Dear Simon

L4, 81-91 Waymouth Street
Adelaide SA 5000
GPO Box 1047
Adelaide SA 5001
Australia

Contact Officer: Arron Broom
Ph: 8124 4929
Email: arron.broom@sa.gov.au

COAST PROTECTION BOARD
Development Applications Email:
DEWNR.CoastProtectionBoardDevelopmentApplications@sa.gov.au

www.environment.sa.gov.au

Development Application No	520/L006/18
Applicant	Australian Walking Company
Description	Alterations to existing tourist accommodation
Location	Cape du Coedic, Flinders Chase National Park, Kangaroo Island
Development Plan Zones	Conservation
Council	Kangaroo Island Council

I refer to the above development application forwarded to the Coast Protection Board (the Board) in accordance with Section 37 of the Development Act 1993. The planning authority is required to have regard to this response prior to making a decision on the proposal.

In accord with part 43 of the Development Regulations, a copy of the decision notification must be forwarded to the Board at the above address.

The following response is provided under delegated authority for the Board, in compliance with the policies within its Policy Document 2012 at:

http://www.environment.sa.gov.au/about-us/boards-and-committees/Coast_Protection_Board/Policies_strategic_plans

More information on coastal development assessment and planning policy is contained in the Coastal Planning Information Package at:

<http://www.environment.sa.gov.au/our-places/coasts>

Background

One of the State Government Election Commitment priorities is to deliver on Ecologically Sensitive Development in National Parks. A focus has been on the promotion of nature-based tourism opportunities in SA's National Parks to increase tourism and provide for a range of eco-sensitive accommodation styles.

The Australian Walking Company (AWC) was selected as the Department for Environment and Water's (DEW) preferred commercial operator to develop eco-sensitive tourism accommodation and associated guided tours along the Kangaroo Island Wildernesses Trail (KIWT).

AWC engaged Troppo Architects to design the tourism accommodation and FYFE Consultants to facilitate the development approval process. This has resulted in three development applications for tourism accommodation (and associated infrastructure), prepared in

consultation with relevant DEW staff, at Cape Du Couedic, Sanderson Bay and Sandy Creek, all within Flinders Chase National Park (NP).

Proposal

This application is for internal alterations to the existing State Heritage Cape du Couedic Lighthouse Keepers' Cottages and construction of a common room. The internal alterations comprise:

- Conversion of one bedroom in each cottage to a second bathroom;
- Updates to the existing bathroom;
- Updates to the existing kitchen
- Internal alterations to the existing store/laundry.

The proposed site and locality plans also depict “proposed guest access trails” and “lookouts” (built platforms).

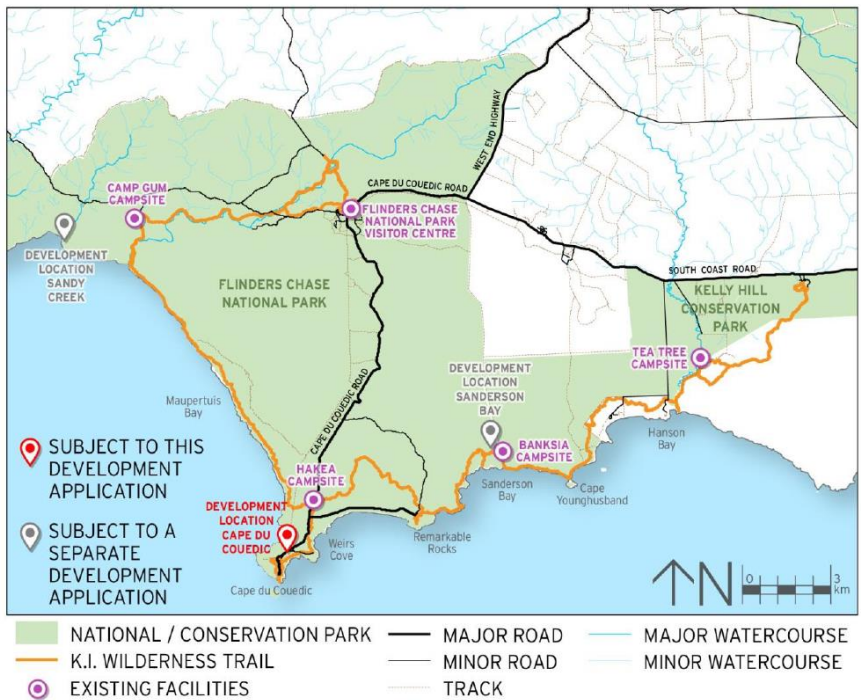


Figure 1 - Location of proposed development

Comments

Coast Protection Board Policy

As per the Coast Protection Board’s Policy Document 2002, the Board seeks to:

- retain coastal open space
- minimise impacts of development on the coast
- maintain compact coastal settlements and restrain development ‘sprawl’ along the coastline

- protect scenic amenity
- protect coastal biodiversity
- minimise or stop development in areas subject to coastal hazards
- minimise future environmental protection costs
- minimise future protection costs by ensuring new development satisfies the Board's flooding and erosion policies
- conserve developed coastal areas for land uses that require a coastal location.

The Board's policies are generally reflected in Council's Development Plan.

Orderly development

Coast Protection Board Policy 1.5:

The Coast Protection Board opposes:

(a) Linear or scattered coastal development, with the exception of tourist accommodation development or that which has a significant public or environmental benefit, as per Policy 1.6. The Board prefers development to be concentrated within existing developed areas or appropriately chosen nodes

Coast Protection Board Policy 1.6:

The Coast Protection Board may support development, including tourist accommodation or that which has a significant public or environmental benefit, in coastal areas outside of urban areas provided:

- *It is sited and designed in a manner that is subservient to important natural values within the coastal environment;*
- *It is not subject to unaddressed coastal hazards;*
- *Adverse impacts on natural features, landscapes, habitats, threatened species and cultural assets are avoided or minimised; and*
- *It will not significantly impact on the amenity of scenic coastal vistas.*

[Guidelines for proposed coastal development outside of urban areas are contained in Appendix 3 of the Policy Document].

The Board has no in-principle objection to appropriate tourism accommodation within Flinders Chase National Park.

The proposed tourism accommodation upgrades are concentrated within an existing developed area, avoiding impacts on coastal biodiversity and scenic amenity. The proposal satisfies the Coast Protection Board's orderly development policies.

Coastal flooding and erosion

The Board's flooding and erosion policies are reflected in the Council Wide "Coastal Areas" section of Council's Development Plan.

The development site is more than 200 metres from the coast and is not at risk of coastal flooding or erosion.

Coastal biodiversity

A key policy objective for the Board is to “protect coastal biodiversity”. The protection of the coastal environment, while important to protect coastal flora and fauna and maintain sustainable coastal ecosystems, also reduces coastal hazard risks to property (e.g. preventing sand drift, erosion and flooding hazard risks etc.).

Board policy (1.4 (e)) also states: *“The Board will seek to ensure that the siting and design of development on the coast minimises its impact on the environment, heritage and visual amenity of the coast.”*

Whilst the proposed tourism accommodation upgrades are concentrated within an existing developed area, the proposed site and locality plans depict “proposed guest access trails” and “lookouts” (built platforms) which may result in some disturbance to coastal landform and habitat and clearance of native vegetation.

The Board is unsure if appropriate investigations have been carried out to determine the alignment and design of trail networks associated with this application. However, the Board is satisfied that DEW can facilitate trail networks in Flinders Chase National Park to ensure impacts on coastal biodiversity are minimised. Accordingly, the Board will not request further information nor comment on coastal biodiversity impacts with this application.

The clearance of native vegetation requires Native Vegetation Council (NVC) consent.

Coastal Heritage

Coast Protection Board Policy 1.4 (e) states:

“The Board will seek to ensure that the siting and design of development on the coast minimises its impact on the environment, heritage and visual amenity of the coast.”

The proposed tourism accommodation upgrades are concentrated within the State Heritage Listed Cape du Couedic Lighthouse Keeper’s Cottages. The planning authority and / or proponent should seek the advice of the Heritage Branch of the Department for Environment, and Water.

Coast Protection Board Response

The Board is unsure if appropriate investigations have been carried out to determine the alignment and design of trail networks associated with this application. However, the Board is satisfied that DEW can facilitate trail networks in Flinders Chase National Park to ensure impacts on coastal biodiversity are minimised. Accordingly, the Board will not request further information nor comment on coastal biodiversity impacts with this application.

The Coast Protection Board advises it has no objections to the proposed development and recommends the following Note be applied to any planning approval:

Notes

- The proposed tourism accommodation upgrades are concentrated within the State Heritage Listed Cape du Couedic Lighthouse Keeper’s Cottages. The planning authority

and / or proponent should seek the advice of the Heritage Branch of the Department for Environment, and Water.

- The applicant is advised that any native vegetation on the site is protected under the *Native Vegetation Act 1991* and *Native Vegetation Regulations 2017*. Prior to any clearance being undertaken (e.g. for trail networks and “look out” platforms), the applicant should seek Native Vegetation Council approval to do so.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Townsend', written in a cursive style.

Murray Townsend
Manager, Coastal Management Branch
Department for Environment and Water
Delegate for the Coast Protection Board



Government of South Australia

Department for Environment
and Water

Heritage South Australia

Economic and Sustainable
Development Group

Level 8
81-91 Waymouth Street
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DX138

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www.environment.sa.gov.au

Ref: SH/12351D
Date: 19 December 2018

Secretary - Ms Alison Gill
State Commission Assessment Panel
GPO Box 1815
Adelaide 5001
Attention: Simon Neldner

Dear Mr Neldner

DESCRIPTION: CAPE DU COUEDIC LIGHTHOUSE KEEPERS' COTTAGES, STABLE & STORE - INTERNAL ALTERATIONS TO AN EXISTING STATE HERITAGE PLACE (CAPE DU COUEDIC LIGHTHOUSE KEEPERS COTTAGES), - FLINDERS CHASE

Application number: 010/L067/18
Referral received: 19/11/2018
State heritage place: Cape du Couedic Lighthouse Keepers' Cottages, Stable & Store,
Flinders Chase National Park, FLINDERS CHASE
Documentation: As lodged

The above application has been referred to the Minister for Environment and Water in accordance with Section 37 of the *Development Act 1993* as development that directly affects a State heritage place or, in the opinion of the relevant authority, materially affects the context within which a State heritage place is situated.

Subject to the recommendation set out below, the proposed development is considered to be acceptable in relation to the above State heritage place for the following reason/s.

- The proposed development consists of the internal alteration of the three original keepers cottages to allow for a dual usage by private and public guests through the year and the construction of a new 'commons' building between two cottages and new observation decks built atop the original stone water tanks.
- The internal alterations provide a new bathroom/toilet in the formerly smallest rear bedroom of each cottage and allows for the installation of a fold-up bed arrangement in the former front lounge. The new 'commons' room outside is lockable to be used only for private group guests.
- No external conservation works are proposed, and no alterations proposed are to be visible externally either.
- Whilst the new 'commons' outdoor room is contemporary in design the alignment with the original cottages and the enclosure by them allows the cottages to not be diminished in heritage value.
- Additionally the new building is designed to be removable without any damage to the site or the cottages in the future, should that be necessary.
- Heritage South Australia has visited the site in June 2018 and been involved in preliminary design discussions.

Recommendation

A. The following condition/s should be incorporated into any consent or approval.

Condition 1: Final roof design details of the new 'Commons' building shall be mutually agreed and then matching documentation provided, to the satisfaction of Council in consultation with the Department for Environment and Water.

Reason for condition: To ensure the design intent is appropriately detailed leading to a well finished result.

General notes

1. Should Council not adopt the above recommendation in full, it will be necessary to obtain the concurrence of the State Commission Assessment Panel before a decision is conveyed to the applicant.
2. Any changes to the proposal for which planning consent is sought or granted may give rise to heritage impacts requiring further consultation with the Department for Environment and Water, or an additional referral to the Minister for Environment and Water. Such changes would include for example (a) an application to vary the planning consent, or (b) Building Rules documentation that incorporates differences from the proposal as documented in the planning application.
3. To ensure a satisfactory heritage outcome, the relevant planning authority is requested to consult the Department for Environment and Water in finalising any conditions or reserved matters above.
4. In accordance with Regulation 43 of the *Development Regulations 2008*, please send the Department for Environment and Water a copy of the Decision Notification.
5. The relevant planning authority is requested to inform the applicant of the following requirements of the *Heritage Places Act 1993*.
 - (a) If an archaeological artefact believed to be of heritage significance is encountered during excavation works, disturbance in the vicinity shall cease and the SA Heritage Council shall be notified.
 - (b) Where it is known in advance (or there is reasonable cause to suspect) that significant archaeological artefacts may be encountered, a permit is required prior to commencing excavation works.For further information, contact the Department for Environment and Water.
6. The relevant planning authority is requested to inform the applicant of the following requirements of the *Aboriginal Heritage Act 1988*.
 - (a) If Aboriginal sites, objects or remains are discovered during excavation works, the Aboriginal Heritage Branch of the Aboriginal Affairs and Reconciliation Division of the Department of the Premier and Cabinet (as delegate of the Minister) should be notified under Section 20 of the *Aboriginal Heritage Act 1988*.

Any enquiries in relation to this application should be directed to Kevin O'Sullivan on telephone (08) 8124 4922 or e-mail DEW.StateHeritageDA@sa.gov.au.

Yours sincerely

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke at the bottom.

Kevin O'Sullivan
Senior Conservation Architect
Department for Environment and Water
as delegate of the
MINISTER FOR ENVIRONMENT AND WATER



Government of South Australia
Kangaroo Island Natural Resources
Management Board

Natural Resources Centre

37 Dauncey Street
PO Box 39
Kingscote SA 5223
T 08 8553 4444
E kinrc@sa.gov.au
ABN 86 052 151 451

Date: 17/12/2018

Simon Neldner
Planning Officer
Development Division
Department of Planning, Transport and Infrastructure

Dear Simon

**Re: Development Application 3697 – 520/L006/18 – Construction of tourism accommodation (Sandy Creek);
Development Application 3698 – 520/L007/18 – Internal alterations to an existing State Heritage building (Cape du Couedic); and
Development Application 3699 – 520/L008/18 – Construction of tourism accommodation (Sanderson Bay).**

The Kangaroo Island Natural Resources Management Board (the Board) thanks you for considering its comments on the above Development Applications under S29 of the *Natural Resources Management Act 2004*. The Board discussed the applications at its general meeting held on Friday 14 December.

The Board, in providing comment on the proposed development, took into consideration both the objectives of the *Natural Resources Management Act 2004* and the *Kangaroo Island Natural Resources Management Plan 2017-2027* objectives and strategies.

The Board is of the view that the proposed development is not in the spirit of the original eco-sensitive accommodation concepts that were envisaged when the Kangaroo Island Wilderness Trail was first proposed in 2011. The concept was for the 'fixed' accommodation to be located in the vicinity of the camp sites but separate enough for the experience to be apart and unique.

The Board believes the proposed footprint of the accommodation pods, associated buildings, and additional walking and access trails, at both Sandy Creek (520/L006/18) and Sanderson Bay (520/L007/18), and the increased human traffic, will have a negative impact on the fragile coastal habitat of both sites. The Board believes the proposed developments should be located closer to the existing walking trail and camp sites. That would reduce the need for extensive new trails and access tracks to support the development, which would cause more fragmentation of the natural systems in Flinders Chase National Park.

The Board also wants to convey the opposition to the proposals from Friends of Parks Kangaroo Island Western Districts, Friends of Dudley Peninsula Parks, and Eco-Action, all local conservation groups.

The Board has no comment in regard to Development Application 520/L007/18 Cape du Couedic Cottages.

Should you require further information regarding this matter, please contact Richard Trethewey, Presiding Member on 0427 594 208 or email restk@westnet.com.au.

Yours sincerely,

A handwritten signature in black ink that reads "Richard Trethewey". The signature is written in a cursive style with a large, sweeping initial 'R'.

Richard Trethewey
PRESIDING MEMBER
Kangaroo Island Natural Resources Management Board

Native Vegetation Council



TO: Jeremy Wood, DPTI - Planning

FROM: Peter Farmer, Native Vegetation Branch DEW

SUBJECT: Application number 520/L008/18

**Construction of tourism accommodation
Kangaroo Island Wilderness Trail**

DATE: 09/01/2019

Level 4
81-95 Waymouth St
ADELAIDE SA 5000

GPO Box 1047
ADELAIDE SA 5001

Ph | 08 8303 9777

nvc@sa.gov.au

Background

The proposed development comprises eight accommodation pods, communal longhouse, lookout, staging post, service building and ancillary water tanks. A series of walking and service trails are proposed to connect the tourist accommodation at Sanderson Bay, Flinders Chase National Park, Kangaroo Island.

The Flinders Chase National Park, Kelly Hill Conservation Park, Ravine des Casoars Wilderness Protection Area and Cape Bouguer Wilderness Protection Area Management Plan (1999) facilitates the development of (commercial upmarket) small scale ecologically sensitive accommodation along the Kangaroo Island Wilderness Trail (KIWT).

The proposal is additional to existing camping nodes provided along the KIWT. The Banksia campground nearby services the section of the trail inland from Sanderson Bay.

Based on departmental mapping the vegetation communities that may be impacted by the proposal are broadly described as:

- *Melaleuca lanceolata*, +/- *Eucalyptus diversifolia* ssp. *diversifolia* mid open shrubland, and
- *Eucalyptus diversifolia* ssp. *diversifolia*, +/- *Eucalyptus albopurpurea*, *Eucalyptus rugosa* mid mallee woodland

The total footprint of the development at Sanderson Bay is approximately 0.2 hectare. It is noted that the site selected for locating buildings appears to support sparser native vegetation. The localised variation in native vegetation is likely due to natural processes such as wind erosion, soils, topography and possible preferential use by kangaroos, the latter as highlighted in the planning statement.

The Native Vegetation Branch (NVB) received an application to clear native vegetation on the 23rd November 2018 associated with the above proposal and other sites along the KIWT to be developed by the proponent, subject to legislative approvals. The application is yet to be processed as additional information has been requested from the applicant.

Discussion

The Native Vegetation Council (NVC) is not generally supportive of proposals that fragment undisturbed remnant vegetation, as this proposal does. However if approved under the *Development Act 1993* there are pathways to approval under *Native Vegetation Regulations*

2017 that may accommodate the proposal, namely regulation 12(33) - *New dwelling or building*. It is recognised that the applicant has attempted to minimise impacts on vegetation however the NVB remains concerned that the proposal does not fully demonstrate how this has been addressed or that other options may be available that would result in less impact.

Areas of concern with the proposal are:

- The distance the site is from KIWT and existing vehicle access and the resultant amount of track development required to connect site to KIWT and proposed staging post. It is believed overall clearance could be reduced if sited closer to KIWT and existing vehicle access tracks.
- Although the building footprint is defined, the total construction footprint is not defined.
- Clearance that may be required for construction vehicle movement, within and to and from the site is not clear.
- While proposed clearance for fire protection is limited to one building, possible additional vegetation clearance for bushfire protection may be necessary as CFS bushfire requirements are yet to be determined.
- Destabilisation and erosion of the site may increase with the removal of vegetation..
- Changes in surface water flow due to altered surfaces and rain water overflow that may impact (beneficially or negatively) surrounding native vegetation.
- Contingency to manage waste water (grey and black) leakage/spills so as to avoid or minimise site impacts.
- Incorporate *Phytophthora cinnamomi* (Dieback) and weed management including hygiene procedures into construction and operational plans.

The above points if not addressed, should be and where relevant incorporated into conditions and associated management plans of development approval.

Application under Native Vegetation Regulations

As required under the *Native Vegetation Regulations 2017*, the proposal will need to account for the total proposed clearance of native vegetation required for the development. This includes:

- building and associated structure footprint,
- construction footprint,
- clearance within 10 metres of a building for maintenance,
- walking tracks,
- vehicle tracks
- additional clearance for bushfire protection.

The proponent must apply for any native vegetation clearance required for the development and meet the requirements of Native Vegetation Regulations; 12(33) - *New dwelling or building* and other regulations that may be relevant. To gain NVC approval for vegetation clearance under the relevant regulation requires that clearance has been minimised and there are no alternatives that would result in less impact. As part of conditions of NVC approval of an appropriate Significant Environmental Benefit (SEB) offset, delivered either on ground or payment to the Native Vegetation Fund will need to be provided by the proponent. Land already dedicated for conservation, including parks under the *National Parks and Wildlife Act 1972* will generally not be considered suitable for SEB offset areas.

Russell Seaman
On behalf of the Native Vegetation Council
Native Vegetation Branch
Department for Environment and Water

russell.seaman@sa.gov.au 0429 678 741



address 43 Dauncey Street, Kingscote
postal PO Box 121, Kingscote SA 5223
phone 08 8553 4500 | **fax** 08 8553 2885
email kicouncil@kicouncil.sa.gov.au
web kangarooisland.sa.gov.au
abn 93 741 277 391

Ref File No: 010/L065/18
010/L067/18
010/L068/18

State Commission Assessment Panel
Attn: Jeremy Wood
GPO Box 1815
Adelaide SA 5001

22 January 2019

RE: Referral Response(s) - Australian Walking Company – Development Applications:
010/L065/18 - Tourism / Tourist Accommodation Development (Sandy Creek) - Piece Q55 DP38340 <NO HUNDRED>
010/L067/18 - Alterations & Additions to Tourist Accommodation (Cape duCouedic) - Piece Q55 DP38340 <NO HUNDRED>
010/L068/18 - Tourism / Tourist Accommodation Development (Sanderson Bay) - Lot 51 DP38340 <NO HUNDRED>

Dear Sir / Madam

Thank you for the opportunity to comment on the abovementioned development proposal by the Australian Walking Company c/- Fyfe planning consultants, proposing tourism / tourist accommodation development comprising a number of accommodation pods, communal hosting buildings at Sandy Creek and Sanderson Bay, and new communal building and internal alteration of the existing light keepers cottages at Cape duCouedic, as additions to the existing Kangaroo Island Wilderness Trail and camps established therewith.

Council acknowledges that the application is to be assessed by the State Commission Assessment Panel as a prescribed class of development listed in Schedule 10 of the Regulations.

Council has reviewed the application detail against relevant provisions of the Kangaroo Island Development Plan (consolidated 17 September 2015) and consider the proposed development to be in reasonable accord with the Plans intent, including the zone objectives, desired character and envisaged forms of development for the Conservation zone.

Council has considered the development(s) locations within the Conservation zone at Sanderson Bay and Sandy Creek, both affording direct and uninterrupted coastal views and being situated in remote, but consolidated coastal areas which should not present a high risk of coastal or inland erosive processes upon the landscape and development site.

The development(s) maintain a low-scale across these sites with the individual and small accommodation pods. The tourist accommodation types do not appear to exceed the 6.5metres height and remain unobtrusive within the landscape, which is considered essential in this environment.



address 43 Dauncey Street, Kingscote
postal PO Box 121, Kingscote SA 5223
phone 08 8553 4500 | **fax** 08 8553 2885
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abn 93 741 277 391

The accommodation types are considered to have a high level of aesthetic merit which offer a unique tourist experience. In addition to the accommodation on the site, the development also offers experiences within the surrounding wilderness in close proximity to the proposed accommodation and communal hosting buildings.

Development in the Cape duCouedic precinct comprises internal alteration to the three light keeper's cottages, which appears to be unobjectionable to Council. The addition of the communal hosting building situated between the existing Parndana and Karatta lodges in fundamentally unobjectionable, however we feel that its design could be more sympathetic to the heritage value of the lodges themselves rather than being boldly modern by design in stark contrast to the heritage listed lodges.

In summary, the proposal represents an exciting opportunity for tourism growth and diversity on Kangaroo Island. The development's unique tourist accommodation and experience is well aligned with the Kangaroo Island Development Plans intent to encourage tourism / tourist accommodation development within the Conservation zone.

Council accordingly advises that it has no objection to the proposal and supports the approval of the proposed development.

Council would appreciate being kept informed on the processing of the application and any variation that may occur as part of the processing. Additionally, clarification of the requirements for approval of the Waste treatment and disposal system and Building Rules Consent to be obtained in due course should be confirmed or conditioned at approval stage.

Should you wish to further discuss any matters associated with this proposal, please do not hesitate to contact me on 8553 4500.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Aaron Wilksch', is written over a light blue circular stamp.

Aaron Wilksch
Manager, Development & Environmental Services



65248-2-003

7 March 2019

Mr Jeremy Wood
Acting Team Leader- State Coordinator-General and Public Housing
Department of Planning, Transport and Infrastructure
By Email: Jeremy.Wood@sa.gov.au

Dear Jeremy,

RESPONSE TO REFERRALS – DA 520/L007/18 – INTERNAL ALTERATIONS TO EXISTING BUILDINGS AND CONSTRUCTION OF COMMON ROOM AT CAPE DU COUEDIC

On behalf of the Australian Walking Company, we write in response to the agency referral comments received for DA 520/L007/18 for internal alterations to the existing State Heritage Cape du Couedic Lighthouse Keepers' Cottages and construction of a common room.

The following agencies were consulted by the State Commission Assessment Panel (SCAP):

- Kangaroo Island Council (Council);
- Heritage SA;
- Country Fire Service (CFS);
- Coastal Protection Board (CPB); and
- Kangaroo Island Natural Resources Management Board (KI NRMB).

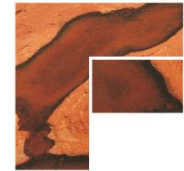
Further to the above, whilst the Native Vegetation Council (NVC) were not consulted about this application, they did include comment on the Cape du Couedic application within their referral response for Sandy Creek. This comment reiterated that the clearance application for the walking trails should demonstrate the need for the proposed trail and that the impacts on native vegetation have been avoided or minimised. This trail is no longer proposed and existing tracks will be used. An updated site is attached confirming this. Please note that the updated site also now shows the water tanks being assessed as part of DA 520/V009/18. These tanks do not form part of DA 520/L007/18.

The KI NRMB did not provide any comment on the Cape du Couedic site.

Responses to the remaining agency's referrals are provided below.

Kangaroo Island Council

Council advised that the design of the communal building could be more sympathetic to the heritage value of the existing buildings rather than being boldly modern. In response, we note that the design of the proposed building aims to draw a clear distinction between which buildings form part of the original heritage fabric of the site and which were later additions. Furthermore, the building has been setback from the alignment of the Parndana and Karatta cottages so that it is not apparent until facing the new building.



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Consequently, Heritage SA concluded the following in their assessment:

‘Whilst the new ‘commons’ outdoor room is contemporary in design the alignment with the original cottages and the enclosure by them allows the cottages to not be diminished in heritage value’.

Therefore, no changes have been proposed to the design of the common building and the design is not considered to detract from the Cape du Couedic Lighthouse Cottages.

Heritage SA

Heritage SA were included in preliminary design discussions and are supportive of the proposed alterations and new building. They recommend that one condition be attached to the Development Plan consent relating to the final roof design details for the new building. On behalf of the applicant, we accept this condition and these details can be provided as part of the construction specifications.

Country Fire Service

The CFS advised that the Cape du Coeudic Lighthouse Cottages had not been subject to a previous development approval and therefore, had not had the opportunity to comment in the past. Given the buildings are currently used as tourist accommodation, the CFS also questioned the *‘relevance of the referral’*. In response to this question, we note that clause 18 of Schedule 8 of the *Development Regulations 2008* requires the following be referred to the SA CFS:

‘Dwellings, tourist accommodation and other forms of habitable buildings –

(b) in a High Bushfire Risk Area in a Bushfire Protection Area,

identified by the relevant Development Plan’.

There is no exception for existing tourist accommodation and a strict interpretation of the above would require any application involving tourist accommodation to be referred to the CFS. Consequently, SCAP have referred the application for comment. Notwithstanding this, it is important to note that the development application does not seek to change the use of the existing buildings and will continue their existing tourist accommodation land use.

CFS advised that the existing access to the site was adequate but that improvements could be made in relation to vegetation management and water supply.

In relation to water supply, a non-combustible water tank exists onsite and could be utilised in the event of a bushfire. This is shown on the site plan included with the application. A separate development application has also been lodged by the Department of Environment and Water (DEW) (DA 520/V009/18) to increase the amount of water storage onsite.

Vegetation in the immediate vicinity (with 3 to 5 metres) of the buildings is currently managed to reduce the threat of bushfire to the buildings. However, the Vegetation Management Zone does not extend past this.

SA Bushfire Solutions have advised that the CFS and the DEW have the following in principle agreements towards this project:

- Commitment to minimise extent of Native vegetation clearance;





- Primary Bushfire Response Plan is to Evacuate early;
- Existing CFS approved Bushfire Safer Places and Last resorts will be utilised where appropriate and other safe locations as identified in relevant DEW Emergency response plans; and
- Existing DEW Emergency Response plans and Evacuation plans will be used where appropriate.

As a result, no additional clearance to vegetation has been proposed adjacent the existing accommodation.

The DEW have advised that the existing Emergency Management Plan and fire management regime will continue whilst AWC manage the sites, with Admiral's Arch being nominated as the nearby last resort. In addition, AWC will implement their own emergency and evacuation response plans that will supplement and reinforce DEW's. These plans have not yet been completed and examples of plans implemented for the similar walks in Tasmania were provided with the development application.

The CFS are aware of the above position and have suggested that the Vegetation Management Zone is a recommendation (see attached email).

Coastal Protection Board

The CPB have advised that the proposed trails and lookouts are the only elements of the development that may impact on the coastal landform and native vegetation. The proposed trails are no longer proposed and existing trails will be utilised. In addition, the 'sunset platform' proposed on 'Site Plan Map L' has been removed and instead two lookouts are proposed as platforms over the existing concrete and stone rainwater tanks as indicated on drawing 'proposed site plan'. Therefore, no additional vegetation removal will occur at Cape du Couedic.

No other concerns were raised as part of the CPB's referral response and recommended that the NVC and Heritage SA also be consulted. This has occurred as discussed above.

In our opinion, the proposed development of this site is relatively minor, comprising internal alterations and a new building on the site. The primary consideration for this site was ensuring that the development was compatible with the State Heritage Cape du Couedic Lighthouse Cottages and this has been achieved, with support of Heritage SA.

Should you have any further queries regarding this proposal, please do not hesitate to contact me on 0408 808 143.

Yours sincerely

Michael Osborn
National Planning Manager

CC: Leah Bertholini, Leah.Bertholini@sa.gov.au

Enclosed:

Appendix A - Amended Plans

Appendix B - Email from Brett Loughlin (CFS)





APPENDIX A

AMENDED PLANS

DRAWING	DATE	CURRENT ISSUE
DRAWING SCHEDULE	7.03.19	Rev 3
LOCALITY PLAN	7.03.19	Rev 3
SITE PLAN MAP L	7.03.19	Rev 3
EXISTING SITE PLAN	18.12.18	
PROPOSED SITE PLAN	7.03.19	Rev 3
SUN, WIND + VIEWS	18.12.18	
SITE PLAN: DETAIL	18.12.18	
EXISTING LODGE FLOOR PLANS	18.12.18	
LODGE FLOOR PLANS	18.12.18	
THE COMMONS	18.12.18	
WATER TANK LOOKOUTS	18.12.18	
SITE PHOTOS + EXISTING BUILDINGS	18.12.18	
ARCHITECTURAL TEXTURES + VIBES	18.12.18	
INTERNAL FINISHES + LITTLE THINGS: COMMONS	18.12.18	



KANGAROO ISLAND WALK CAPE DU COUEDIC DRAWING SCHEDULE

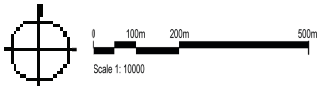
7 MARCH 2019 (Rev.3)



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--- Proposed guest access trail
--- Kangaroo Island Wilderness Trail

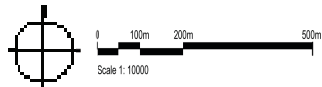


KANGAROO ISLAND WALK CAPE DU COUEDIC
LOCALITY PLAN

7 MARCH 2019 (Rev. 3)



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KANGAROO ISLAND WALK CAPE DU COUEDIC
LOCALITY PLAN

7 MARCH 2019 (Rev. 3)



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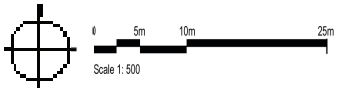
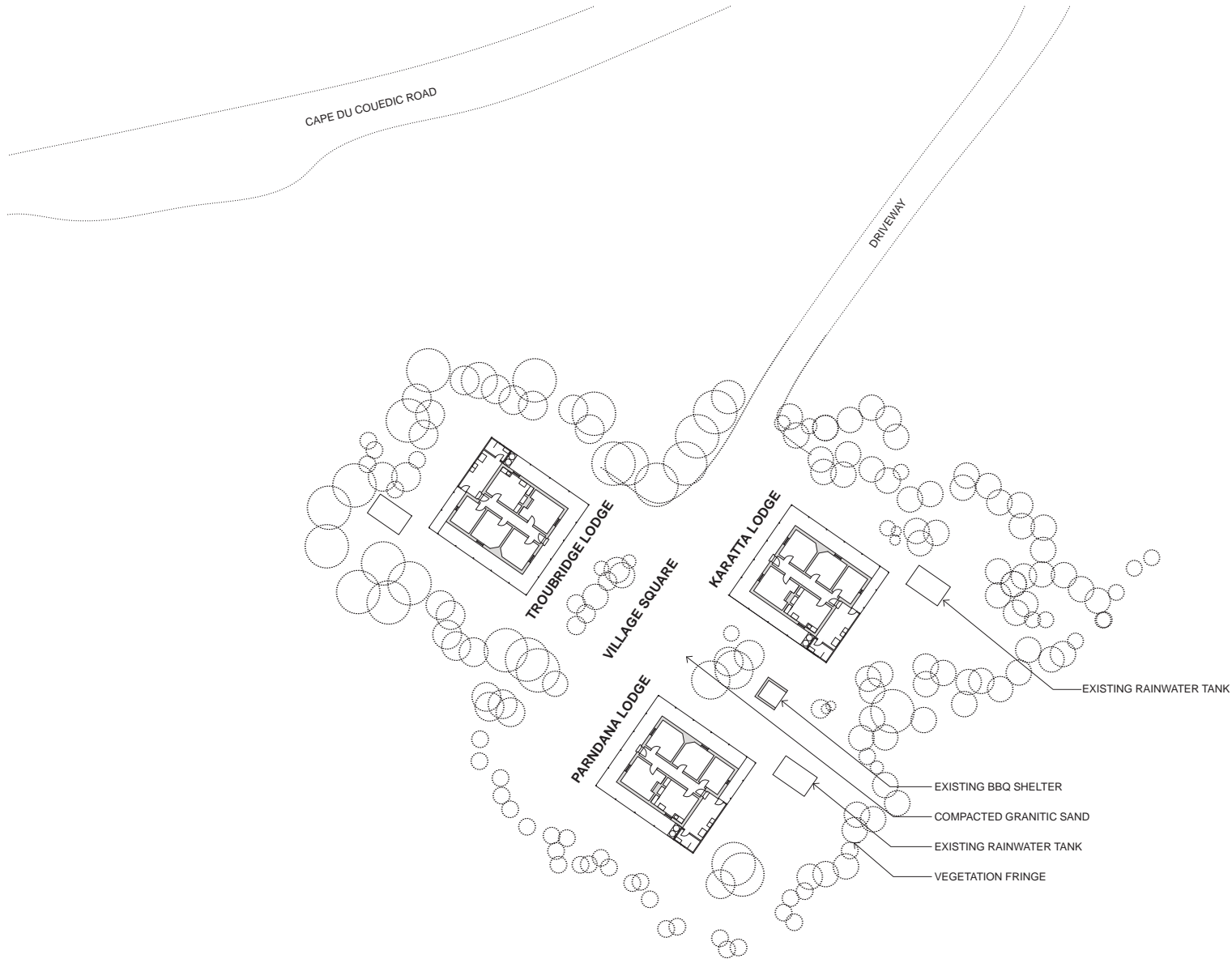


KANGAROO ISLAND WALK CAPE DU COUEDIC
SITE PLAN MAP L

7 MARCH 2019 (Rev.3)



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KANGAROO ISLAND WALK CAPE DU COUEDIC
EXISTING SITE PLAN

18 DEC 2018

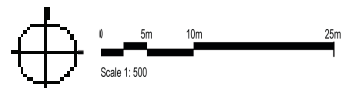


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

**KANGAROO ISLAND WALK CAPE DU COUEDIC
PROPOSED SITE PLAN**

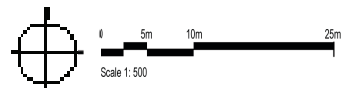
7 MARCH 2019 (Rev. 3)



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-  95,500L AQUAMATE rainwater tank. 7430mm dia. x 2220mm H on concrete plinth. Colour: Colorbond Monument
NOTE: exact location to be confirmed on site with DEW
Subject to separate DA (520/V009/18)
-  SAPN Approximate location of SAPN pole
-  100mm dia. PVC underground rainwater connection from downpipes to water tank
-  Approximate location of underground electrical connection

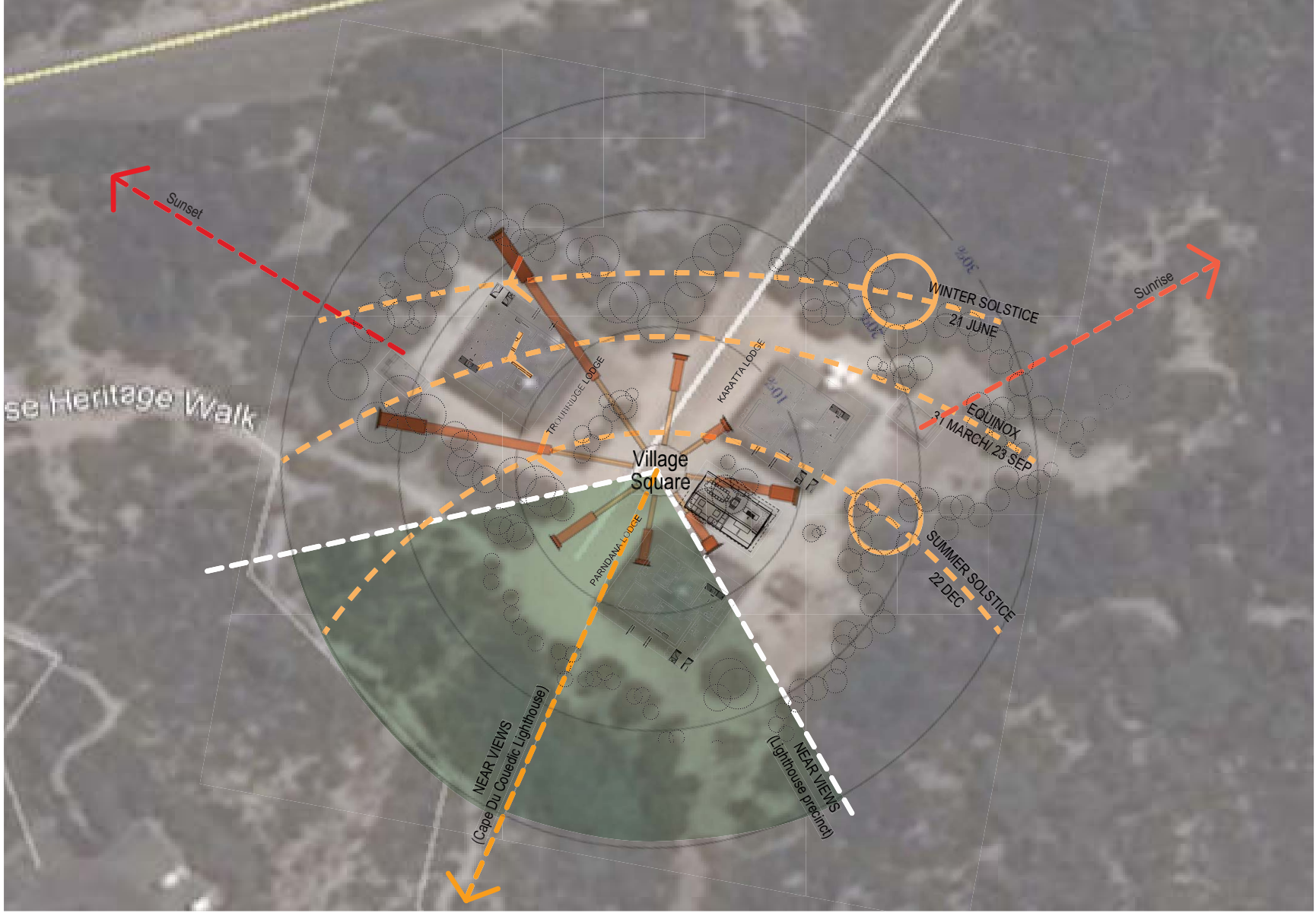


KANGAROO ISLAND WALK CAPE DU COUEDIC
PROPOSED SITE PLAN

7 MARCH 2019 (Rev.3)

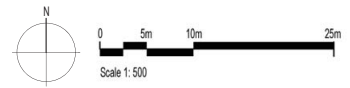


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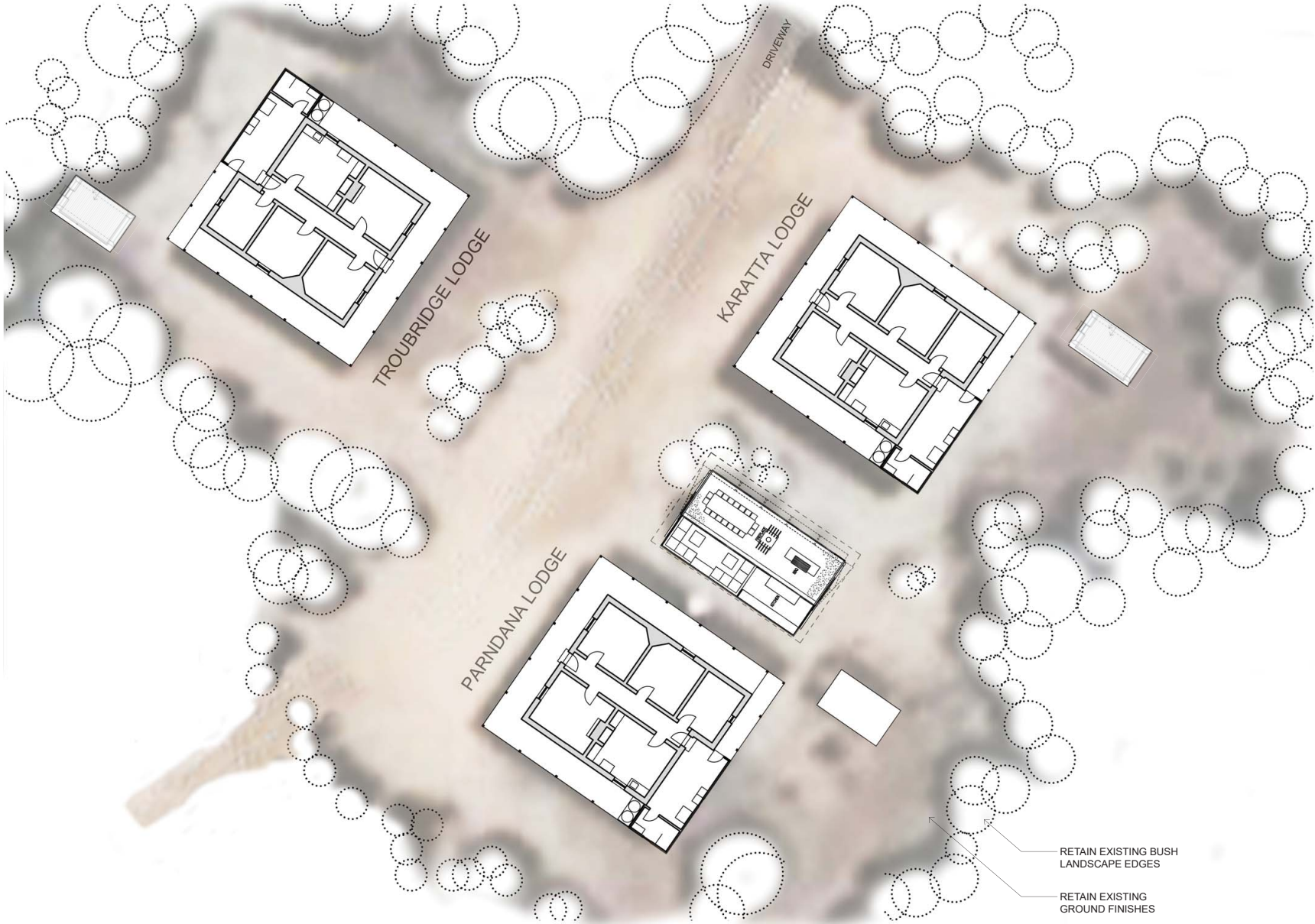


KANGAROO ISLAND WALK CAPE DU COUEDIC
SUN, WIND & VIEWS

18 DEC 2018



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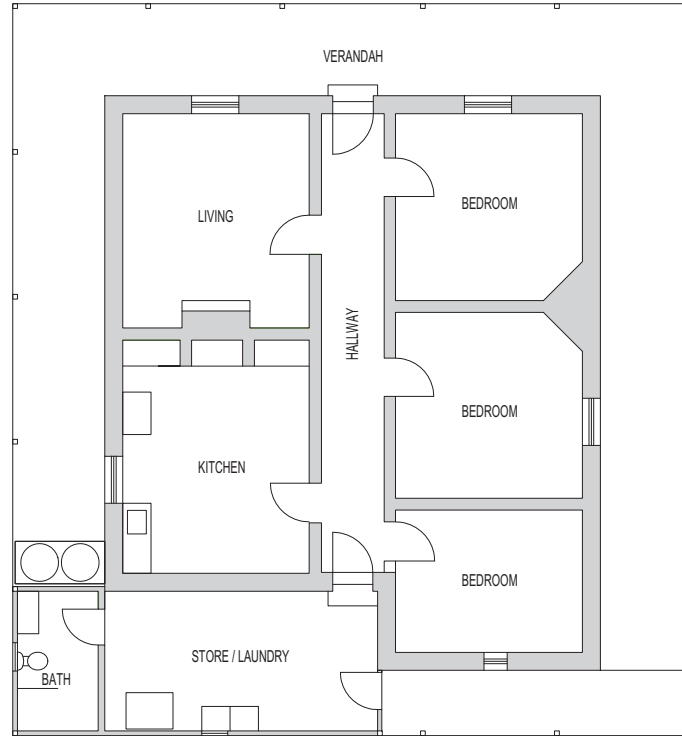


KANGAROO ISLAND WALK CAPE DU COUEDIC
SITE PLAN DETAIL

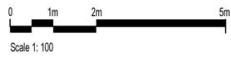
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EXISTING FLOOR PLAN
TROUBRIDGE, PARNDANA AND KARATTA LODGES



KANGAROO ISLAND WALK CAPE DU COUEDIC
EXISTING LODGE FLOOR PLANS

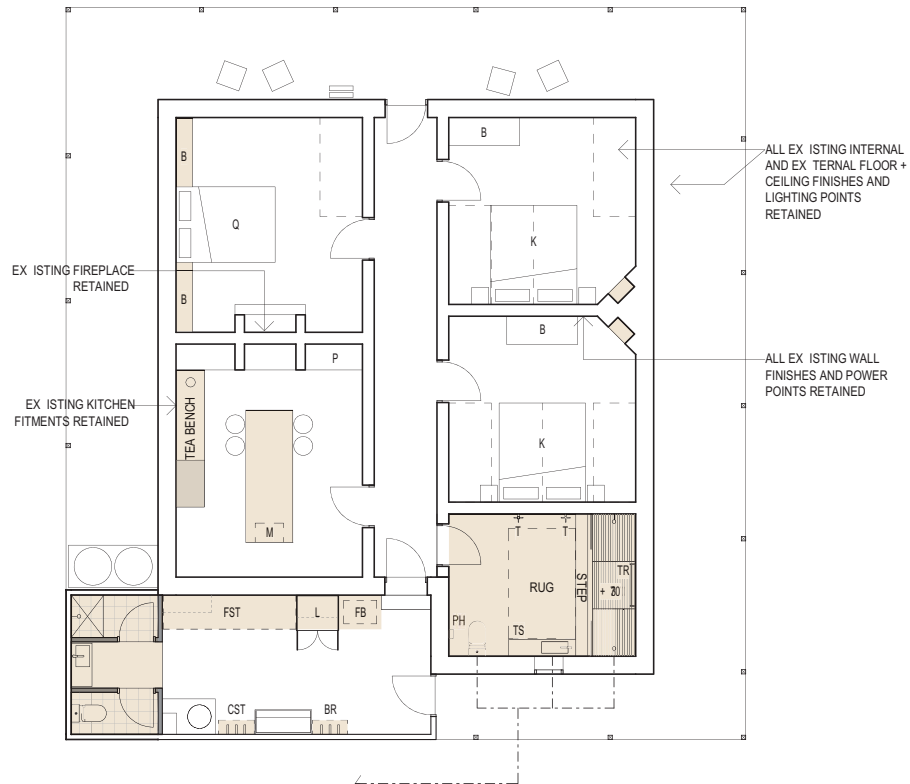
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KANGAROO ISLAND WALK CAPE DU COUEDIC LODGE FLOOR PLANS

18 DEC 2018



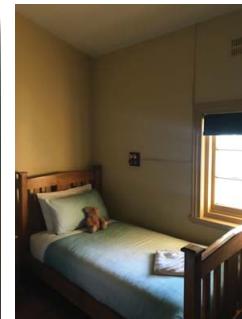
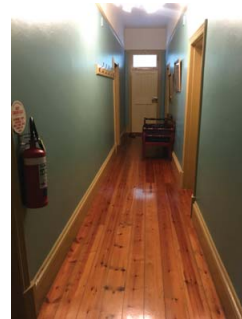
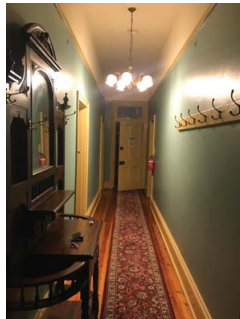
FLOOR PLAN - WALK MODE
TROUBRIDGE AND KARATTA LODGES



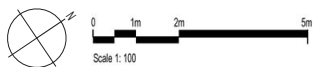
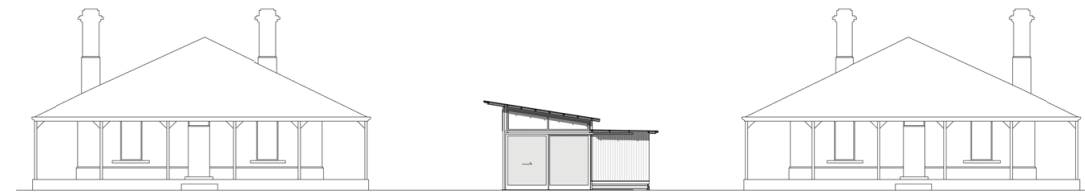
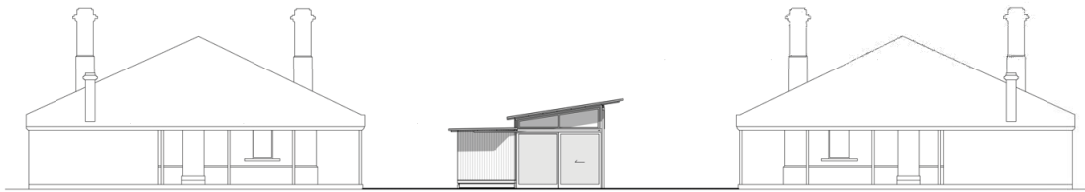
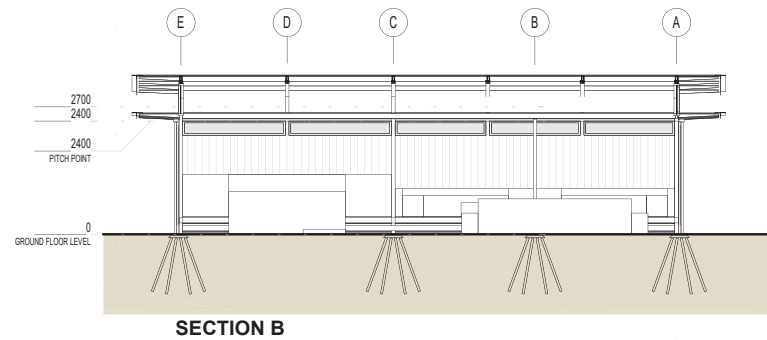
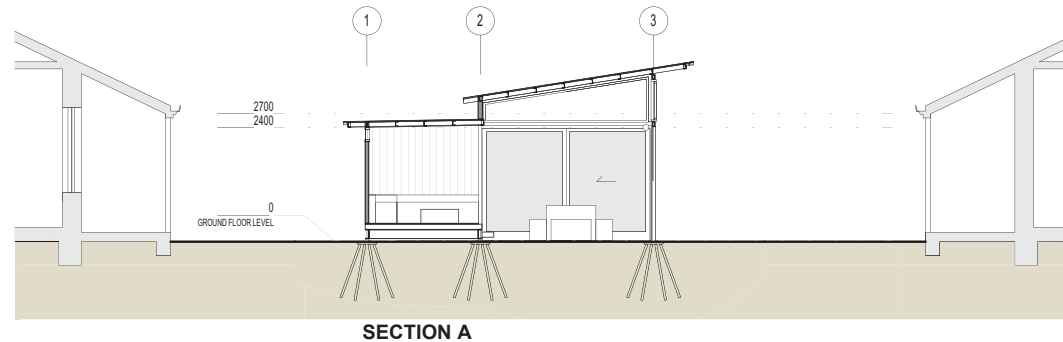
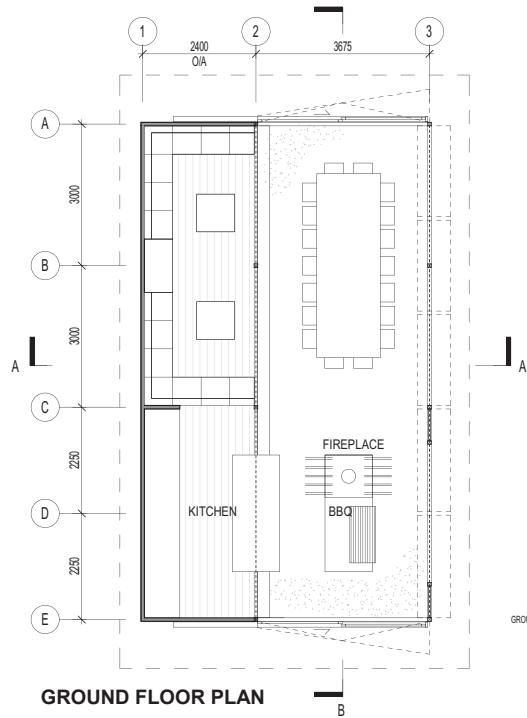
FLOOR PLAN - NON-WALK MODE
TROUBRIDGE AND KARATTA LODGES

PLAN KEY

- REFURBISHMENT AREAS/ ITEMS - REF ADDITIONAL DETAIL
- B BAG PARK
- BR BROOMS
- C CONSUMABLES/ MAINTENANCE
- F FRIDGE LOCATION
- FST FURNITURE STORE
- K KING BED
- L LINEN STORE
- M MICROWAVE UNDER
- P OPEN PANTRY UNDER
- PH TOILET PAPER HOLDER
- Q QUEEN BED
- T TREE
- TR TOWEL RAIL
- TS TOWEL STACK



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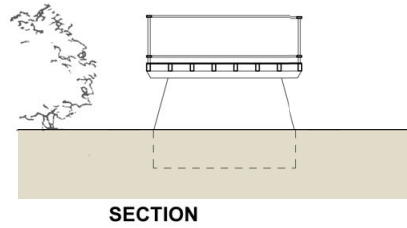
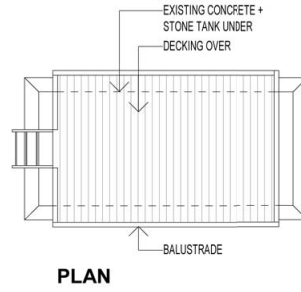


KANGAROO ISLAND WALK CAPE DU COUEDIC
THE COMMONS

18 DEC 2018



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KANGAROO ISLAND WALK CAPE DU COUEDIC
WATER TANK LOOKOUTS

18 DEC 2018



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End of the day's walk



Village Square



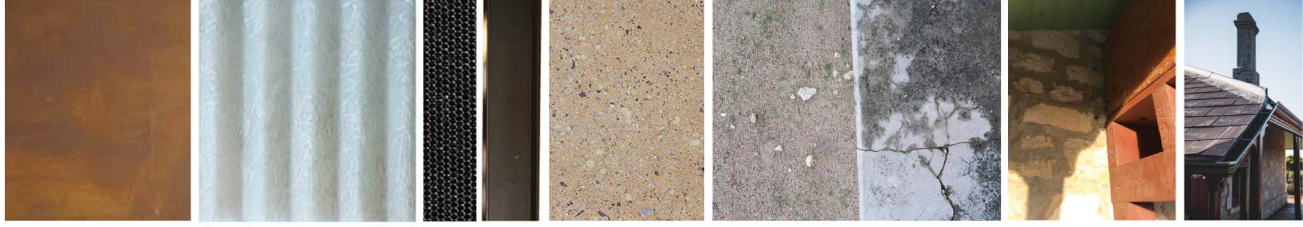
Lookout

KANGAROO ISLAND WALK CAPE DU COUEDIC
SITE PHOTOS & EXISTING BUILDINGS

18 DEC 2018



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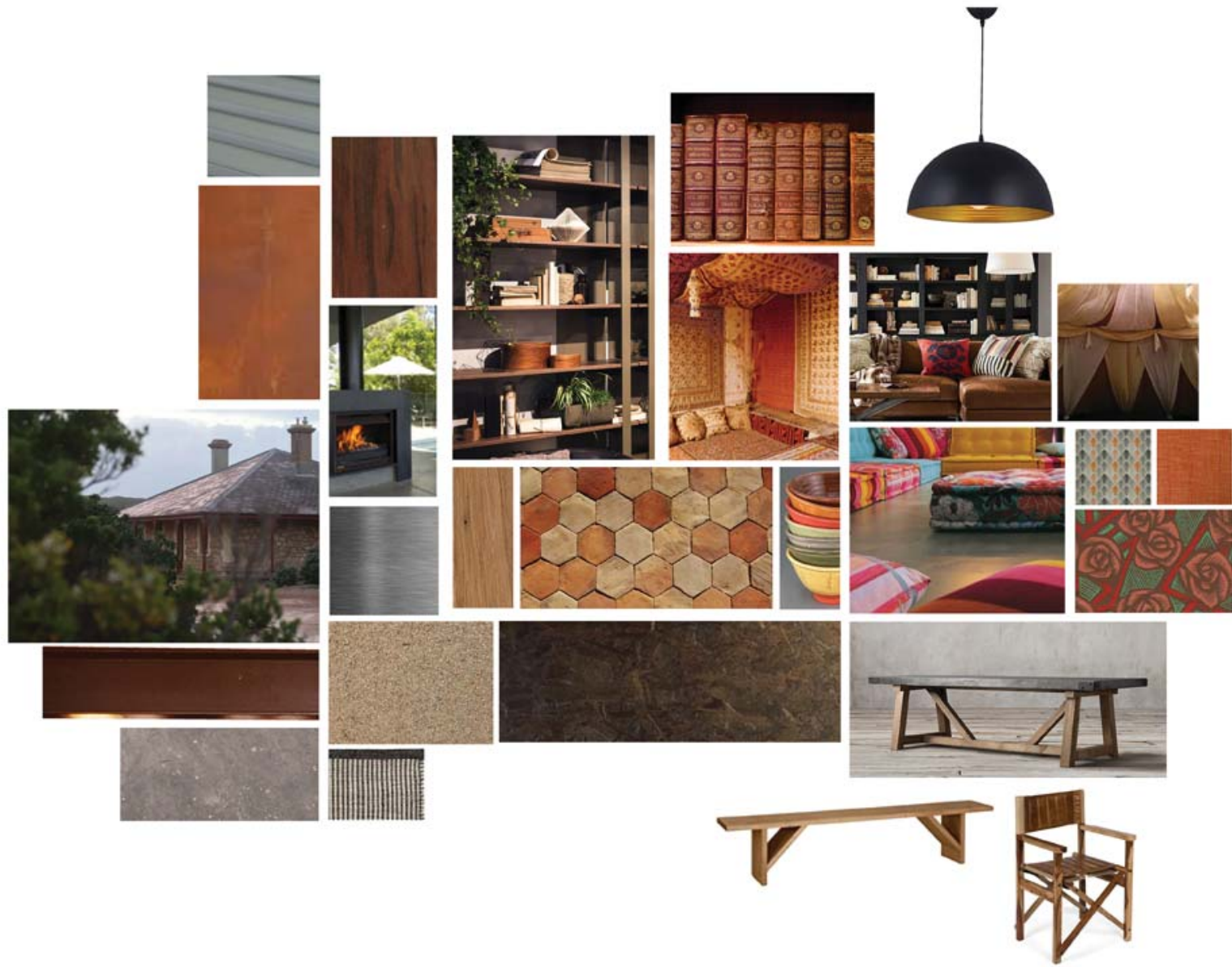


KANGAROO ISLAND WALK CAPE DU COUEDIC
ARCHITECTURAL TEXTURES & VIBES

18 DEC 2018



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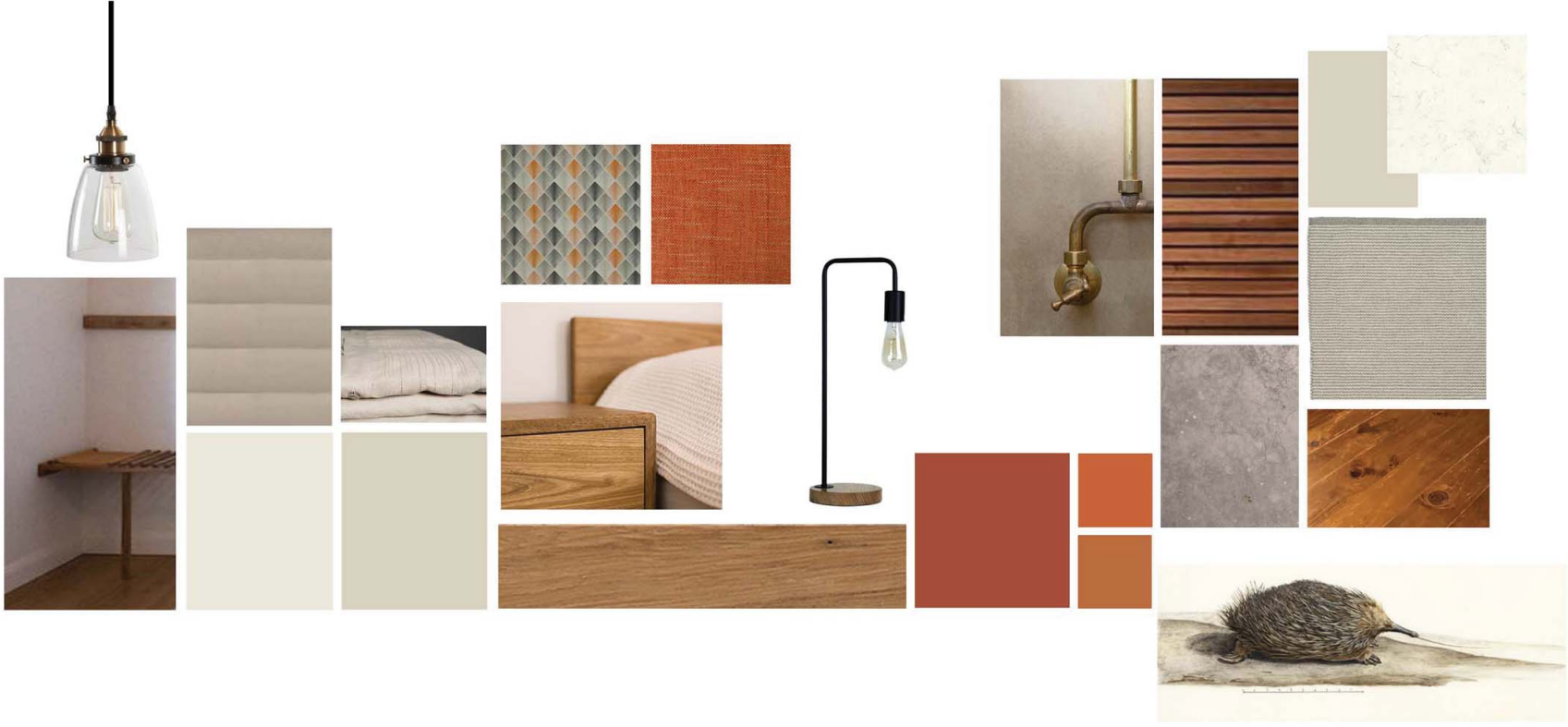


KANGAROO ISLAND WALK COMMONS: CAPE DU COUEDIC
INTERNAL FINISHES & LITTLE THINGS

18 DEC 2018



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**KANGAROO ISLAND WALK LODGES: CAPE DU COUEDIC
INTERNAL FINISHES & LITTLE THINGS**

18 DEC 2018



troppo



APPENDIX B

EMAIL FROM BRETT LOUGHLIN (CFS)

Kayla Gaskin

From: Loughlin, Brett (CFS) <Brett.Loughlin@sa.gov.au>
Sent: Friday, 22 February 2019 2:27 PM
To: Dayna@taswalkingco.com.au
Cc: Neil@thunderbird2.com.au; O'Malley, John (DEW); Kayla Gaskin; Heath@taswalkingco.com.au; Leah Salamon (CFS:SUMM); Taggart, Joel (CFS)
Subject: FW: Australian Walking Company - Kangaroo Island Lodge Walk - Cape du Couedic Cottages

Hi Dayna,

Thank you for your email. In terms of the conditions for the Cape du Couedic accommodation, the SACFS has made these in order to ensure consistency with best practice and to demonstrate due diligence.

DPTI will determine whether they want to include these as decisions or as recommendations; but in order to provide a level of safety should the primary plan fail, the provision of water and the management of the adjacent fuel will help ensure the best outcomes.

If the creation of a Vegetation Management Zone was supported, we could provide advice on how to achieve this so as to minimise the risk of erosion, wind damage, or corrosion. This could also be achieved in line with any heritage concerns – as ultimately the continued longevity of the habitable structures is an important outcome.

I hope this provides some clarification on the intent and purpose of our correspondence.

Kind Regards

Cmdr. Brett Loughlin

A/Director, Preparedness Operations
SA Country Fire Service

From: Bertholini, Leah (CFS) <Leah.Bertholini@sa.gov.au>
Sent: Friday, 22 February 2019 1:28 PM
To: Loughlin, Brett (CFS) <Brett.Loughlin@sa.gov.au>; Taggart, Joel (CFS) <Joel.Taggart@sa.gov.au>
Subject: FW: Australian Walking Company - Kangaroo Island Lodge Walk - Cape du Couedic Cottages

Can one of you call me about this before I respond please.

Leah Bertholini

Bushfire Safety Officer
South Australian Country Fire Service
Level 5, 60 Waymouth Street, Adelaide
Adelaide SA 5000

T 08 8115 3372 | F 08 8115 3301 | M | E Leah.Bertholini@sa.gov.au

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From: Dayna Trevaskis <Dayna@taswalkingco.com.au>
Sent: Friday, 22 February 2019 11:14 AM
To: Bertholini, Leah (CFS) <Leah.Bertholini@sa.gov.au>
Cc: Neil Lynch <Neil@thunderbird2.com.au>; O'Malley, John (DEW) <John.O'Malley@sa.gov.au>; Kayla Gaskin <Kayla.Gaskin@fyfe.com.au>; Heath Garratt <Heath@taswalkingco.com.au>
Subject: Australian Walking Company - Kangaroo Island Lodge Walk - Cape du Couedic Cottages

Hi Leah,

Hope this email finds you well.

Our team have been working through your CFS Referral Agency comments for both Sandy Creek and Sanderson Bay, for our Kangaroo Island Lodge Walk project.

One item we are keen to gain a bit more clarity around is the separate application for Cape du Couedic – we had noted that the application does not constitute a change of use, and as such were proposing to use the existing DEW protocol for Emergency management and evacuation (for continuing use as privately rented accommodation), in combination with our own Emergency management protocol (1. Evacuate, 2. Relocate to Safer Place - Admirals Arch).

We also note that in your recommendations you requested that at Cape du Couedic we install:

1. 22,000L dedicated Firefighting water, hose and pump (with dedicated off-grid generator)
2. Vegetation Management Zone

It is unclear to us as to whether we are required to do this or whether (as there is no change of use) is it a recommendation only?

The extent of the Vegetation Management Zone (assume 20m radius around all habitable structures) and level of clearing required may be both a concern for Native Vegetation and SA Heritage. Any significant reduction in vegetation around these buildings reduces protection from wind/elements and associated corrosion and soil erosion that may compromise the existing Heritage listed structures.

Given that the priority is to evacuate and that there is no change in use from existing is it possible for us to work address this item through Emergency Management procedures?

Also, if we were not to proceed with our application (and subsequent use of the cottages) would DEW be required to do carry out this work anyway?

We are hoping to finalise our response ASAP, so if you can please give me a call to discuss that would be most appreciated.

Thanks Leah, look forward to speaking soon,

Cheers,

Dayna



Dayna Trevaskis
Project Coordinator

Tasmanian Walking Company

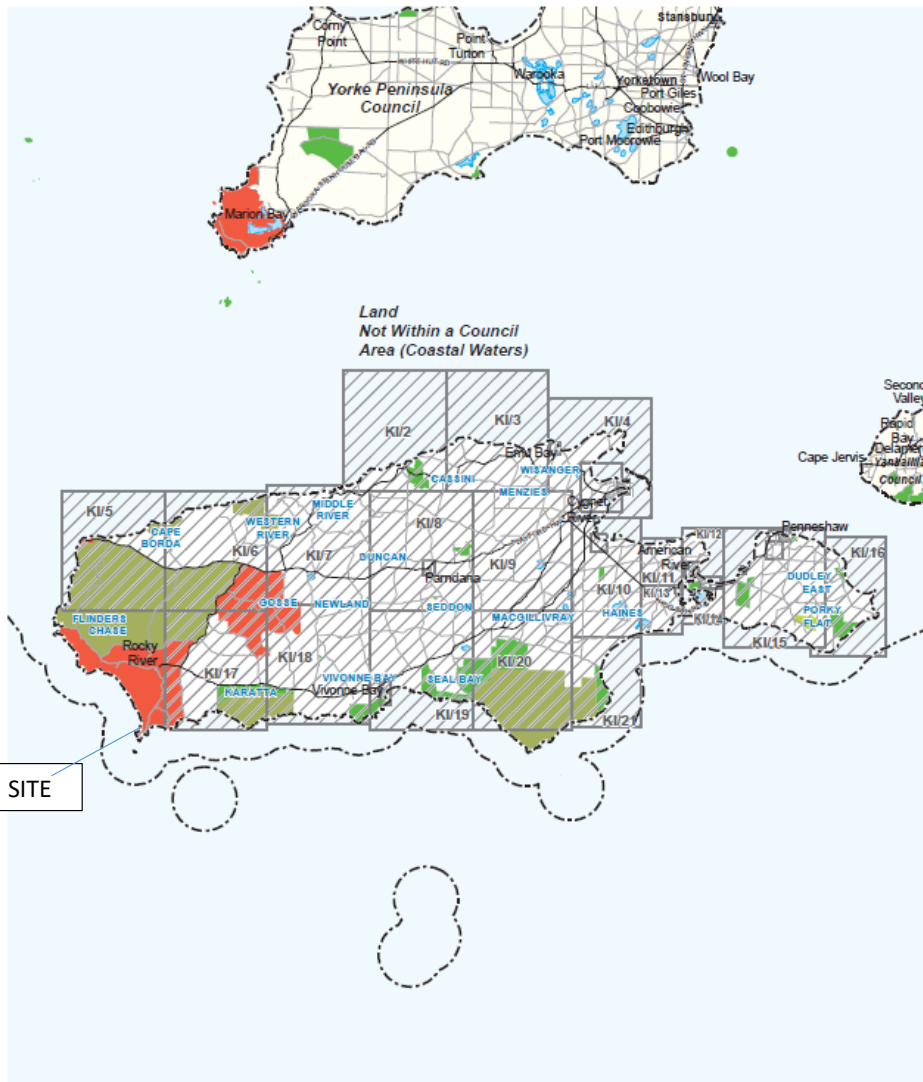
Quamby Estate, 1145 Westwood Rd, Hagley TAS 7292

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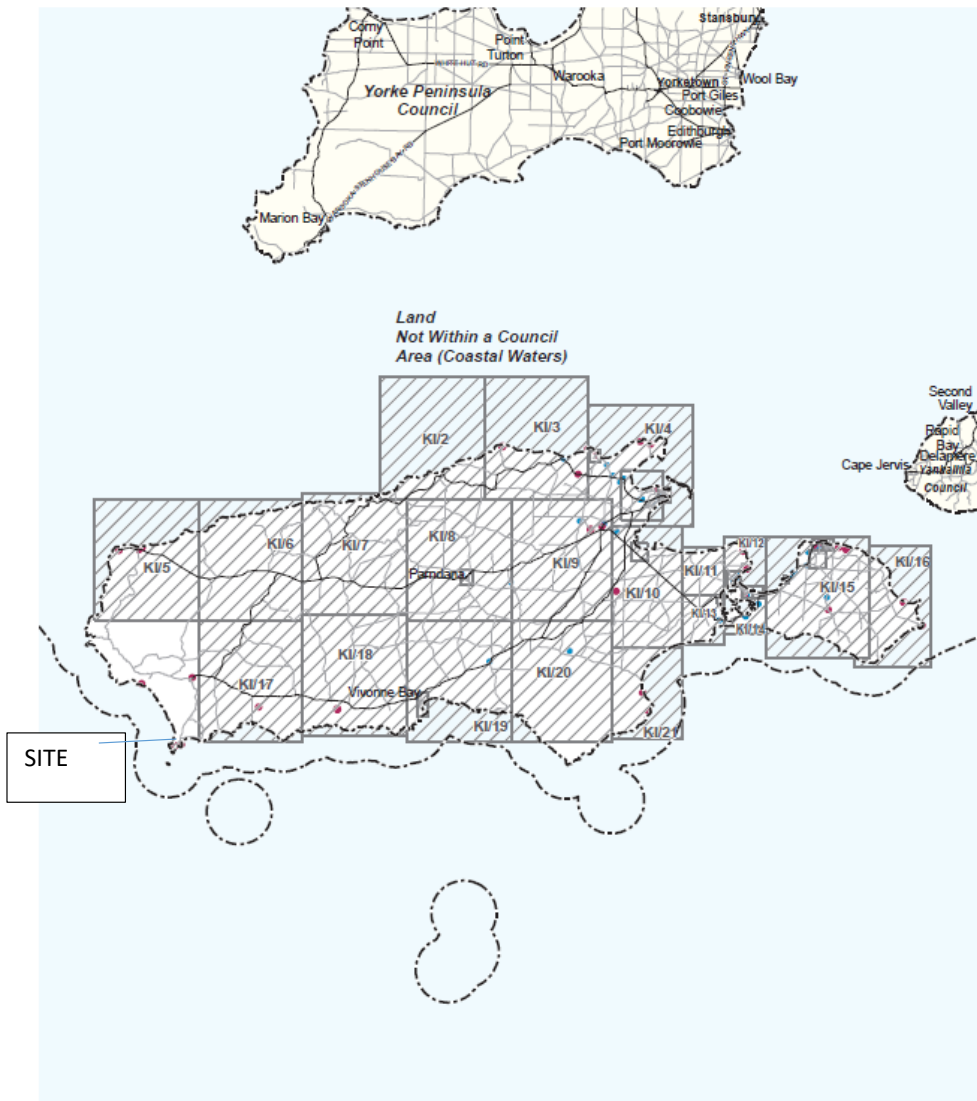
-  Council Office
-  National Park
-  Conservation Park
-  Wilderness Protection Area
-  Conservation Reserve
-  Waterbodies
-  Development Plan Boundary

Location Map KI/1

KANGAROO ISLAND COUNCIL
Consolidated - 17 September 2015

Kangaroo Island Council
Table Section
Table KI/5 - State Heritage Places

Property Address	Description and/or Extent of Listed Place	Lot No. or Part Sec	Plan No.	Certificate of Title	Section 16 Criteria	SA Heritage Register ID
near EMU BAY VIA KINGSCOTE	Cape d'Estaing to Emu Bay (west) and Emu Bay (east) to Boxing Bay Coastline (designated place of palaeontological significance)	S415	H110800	CR 5765/375	b c d	14548
		S416	H110800	CR 5765/376		
		S423	H110800	CR 5765/377		
		S500	H110800	CR 5765/394		
		S429	H110800	CR 5744/569		
		S431	H110800	CR 5744/570		
		A98 A1000	T110802 D70632	CR 5862/290 CR 5967/728		
Maupertuis Bay FLINDERS CHASE VIA KINGSCOTE	David Kilpatrick's Grave, Flinders Chase National Park	A51	D38340	CR 5778/21	a	14746
FLINDERS CHASE VIA KINGSCOTE	Cape du Couedic Lighthouse, Flinders Chase National Park	A1	F31869	CR 5778/21		10398
FLINDERS CHASE VIA KINGSCOTE	Weirs Cove Jetty, Funnelway & Store Ruin, Flinders Chase National Park	Q55	D38340	CR 5778/21		10402
FLINDERS CHASE VIA KINGSCOTE	Cape du Couedic Lighthouse Keepers' Cottages, Stable & Store, Flinders Chase National Park	Q55	D38340	CR 5778/21		12351
FLINDERS CHASE VIA KINGSCOTE	Rocky River Homestead, Flinders Chase National Park	Q55	D38340	CR 5778/21		12588
Off South West River Road KARATTA VIA KINGSCOTE	Grassdale Homestead (also known as Edwards' Cottage) and Sealers' Sites, Kelly Hill Conservation Park	A152	D38341	CR 5685/175	c	14645
Cassini Road, near KINGSCOTE	Cassini Station Complex and Mulberry Tree	A2	F8523	CT 5495/488	a b c	14750
		A1	F8523	CT 5825/100		
Lot 140 Centenary Avenue KINGSCOTE	Dwelling ('Hope Cottage')	A140	D1691	CT 5498/954		10401
Off Cordes Road KINGSCOTE	'The Bluff' Cottage (Formerly 'Reeves' Cottage, 'Seaview Farm')	Q23	D75867	CT 6021/719		14406
6 Dauncey Street KINGSCOTE	Combined Shop/Dwelling (originally Barrett's Store)	A755	F180787	CT 5860/786		12374



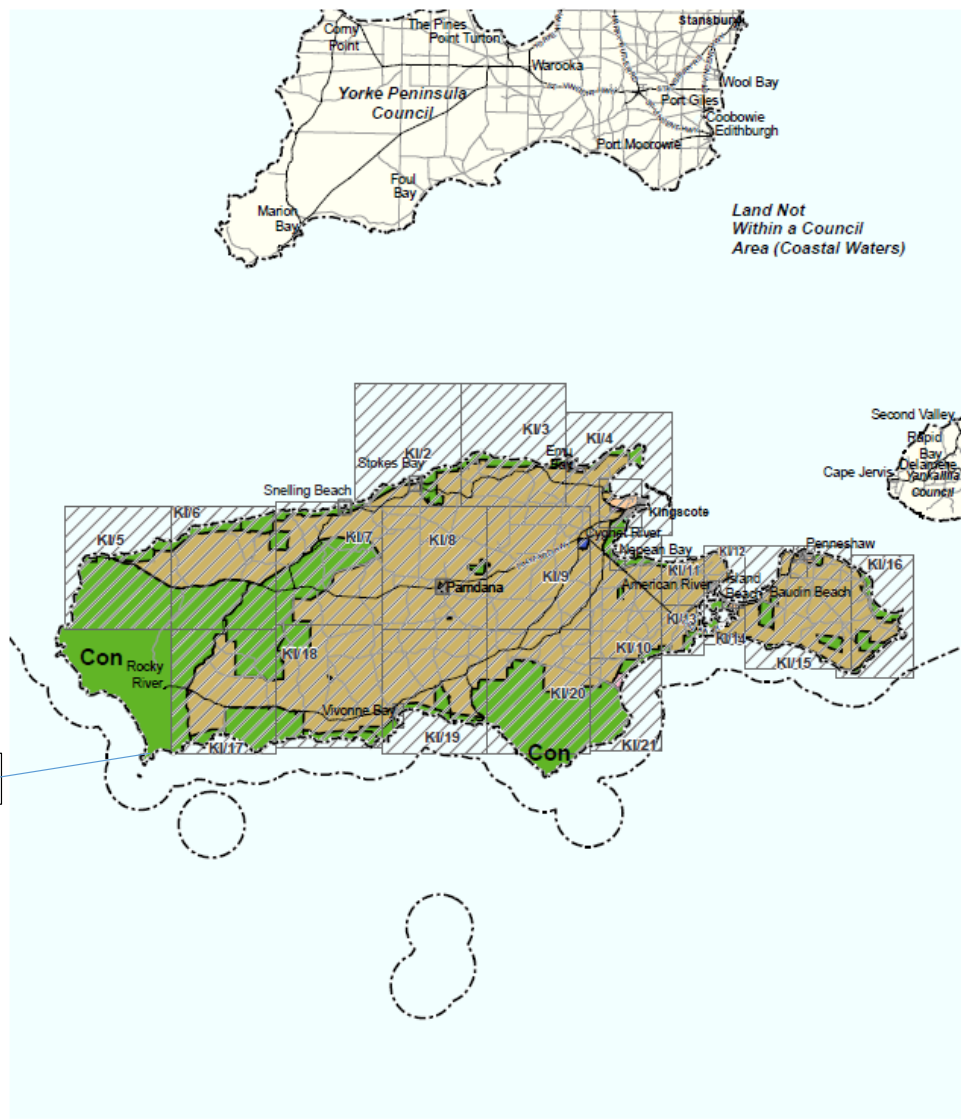
Heritage points are Indicative only.
 For further information on State and Local Heritage Places and Contributory
 Items please refer to the relevant tables within this document.



- State heritage place
- Local heritage place
- Historic Conservation Area
- Development Plan Boundary

Overlay Map KI/1 HERITAGE

KANGAROO ISLAND COUNCIL
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SITE

See enlargement map for accurate representation.



- Zones
- Conservation
 - Zone Boundary
 - Development Plan Boundary

Zone Map KI/1

KANGAROO ISLAND COUNCIL
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CONSERVATION ZONE

OBJECTIVES

- 1 The conservation and enhancement of the natural environment and natural ecological processes for their historic, scientific, landscape, faunal habitat, biodiversity and cultural values.
- 2 Provision of opportunities for the public to experience and appreciate the significance of the native vegetation and original remnant natural habitat of the area through low-impact recreational activities and interpretive facilities.
- 3 Development that contributes to the desired character of the zone.

DESIRED CHARACTER

Conservation areas, including National, Conservation and Marine Parks and Wilderness Protection Areas, will continue to provide representative samples of the countryside and shoreline.

Facilities for the use of visitors including picnic areas, shelters, huts / bothies, camp sites, toilets, and similar public amenities as well as various forms of low-key, short stay tourist accommodation such as semi-permanent tents and lodges are anticipated provided they are appropriately sited and designed in a manner that is subservient to the natural and coastal environment and adverse impact on natural features, landscapes, habitats and cultural assets is minimised.

The siting of tourism development, including any associated access driveways and ancillary structures, on cleared or degraded areas is preferred. Development should be located away from fragile coastal environments and significant habitat or breeding grounds.

There is some land on Kangaroo Island where the flora and fauna have developed naturally and are still not noticeably affected by human intervention. These areas will be kept free of artificial improvements so that visitors may experience a completely natural environment. Such areas will remain as wilderness areas in order to preserve their special character.

There is a need to preserve the natural character of land bordering rivers and at river mouths.

Land division will not occur except to accommodate an existing, lawfully erected dwelling, or to realign boundaries and will be required to meet various criteria, including in relation to approved waste control systems and effluent disposal, direct access to a public road, land division requirements, public access to the waterfront, the creation of waterfront reserves for conservation purposes, and other environmental considerations.

Dwelling additions or replacement dwellings will be supported where they meet various criteria in order to assist environmental improvements, including the provision of approved waste control systems and effluent disposal, building set-backs and site coverage requirements, the raising of living areas above the level of hazard risk due to flooding or inundation or to reduce the level of hazard risk, and other environmental considerations.

PRINCIPLES OF DEVELOPMENT CONTROL

Land Use

- 1 The following forms of development are envisaged in the zone:
 - directional, identification and/or interpretative advertisements and/or advertising hoardings for conservation management and tourist information purposes
 - facilities associated with the interpretation and appreciation of natural and cultural heritage such as public amenities, camping grounds, remote shelters, huts / bothies
 - scientific monitoring structures or facilities
 - structures for conservation management purposes
 - tourist accommodation.
- 2 Development listed as non-complying is generally inappropriate and not acceptable unless it can be demonstrated that it does not undermine the objectives and principles of the Development Plan.

Form and Character

- 3 Development should not be undertaken unless it is consistent with the desired character for the zone.
- 4 Development should be undertaken in a manner which minimises the effect on natural landscape features, flora and fauna and their habitat corridors, land adjoining water, scenic routes or scenically attractive areas.
- 5 Development should use the following measures to avoid impacting detrimentally on the natural environment, processes and/or conservation qualities of land in the zone:
 - (a) minimising the extent of earthworks
 - (b) minimising the extent of vehicle access servicing that development
 - (c) minimising the extent of local indigenous vegetation removal
 - (d) being sited in an unobtrusive manner preferably below hilltops or prominent ridgelines
 - (e) screening the visual impact by planting locally indigenous species having due regard to bushfire risk
 - (f) utilising external low reflective materials and finishes that will minimise glare and blend in with the features of the landscape.
- 6 Where public access is necessary in the zone, the construction of recreational trails and appropriate fencing such as post and wire should be provided to control the movement of the public whilst minimising the impact on biodiversity.

Public Notification

Categories of public notification are prescribed in Schedule 9 of the *Development Regulations 2008*.

Further, the following forms of development (except where the development is non-complying) are designated:

Category 1	Category 2
<p>Directional, identification and/or interpretative advertisements and/or advertising hoardings for conservation management and tourist information purposes.</p> <p>Facilities associated with the interpretation and appreciation of natural and cultural heritage and public amenities.</p> <p>Scientific monitoring structures or facilities.</p> <p>Shop</p> <p>Structures for conservation management purposes.</p> <p>Tourist accommodation setback a minimum of 100 metres from land within an adjoining allotment used for farming or horticulture.</p>	

GENERAL SECTION

Coastal Areas

OBJECTIVES

- 1 The protection and enhancement of the natural coastal environment, including environmentally important features of coastal areas such as mangroves, wetlands, sand dunes, cliff-tops, native vegetation, wildlife habitat, shore and estuarine areas.
- 2 Protection of the physical and economic resources of the coast from inappropriate development.
- 3 Preservation of areas of high landscape and amenity value including stands of vegetation, shores, exposed cliffs, headlands, islands and hill tops, and areas which form an attractive background to urban and tourist areas.
- 4 Development that maintains and/or enhances public access to coastal areas with minimal impact on the environment and amenity.
- 5 Development only undertaken on land which is not subject to or that can be protected from coastal hazards including inundation by storm tides or combined storm tides and stormwater, coastal erosion or sand drift, and probable sea level rise.
- 6 Development that can accommodate anticipated changes in sea level due to natural subsidence and probable climate change during the first 100 years of the development.
- 7 Development which will not require, now or in the future, public expenditure on protection of the development or the environment.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should be compatible with the coastal environment in terms of built-form, appearance and landscaping including the use of walls and low pitched roofs of non-reflective texture and natural earth colours.

Environmental Protection

- 2 The coast should be protected from development that would adversely affect the marine and onshore coastal environment, whether by pollution, erosion, damage or depletion of physical or biological resources, interference with natural coastal processes or any other means.
- 3 Development should not be located in delicate or environmentally-sensitive coastal features such as sand dunes, cliff-tops, wetlands or substantially intact strata of native vegetation.
- 4 Development should not be undertaken where it will create or aggravate coastal erosion, or where it will require coast protection works which cause or aggravate coastal erosion.
- 5 Development should be designed so that solid/fluid wastes and stormwater runoff is disposed of in a manner that will not cause pollution or other detrimental impacts on the marine and on-shore environment of coastal areas.
- 6 Effluent disposal systems incorporating soakage trenches or similar should prevent effluent migration onto the inter-tidal zone and be sited at least 100 metres from whichever of the following requires the greater distance:

- (a) the mean high-water mark at spring tide, adjusted for any subsidence for the first 50 years of development plus a sea level rise to reflect probable climate change during the first 100 years of the development
 - (b) the mean high-water mark at spring tide, adjusted for any subsidence for the first 50 years of development plus a sea level rise of 1 metre
 - (c) the nearest boundary of any erosion buffer determined in accordance with the relevant provisions in this Development Plan.
- 7 Development should be designed and sited so that it does not prevent natural landform and ecological adjustment to changing climatic conditions and sea levels and should allow for the following:
- (a) the unrestricted landward migration of coastal wetlands
 - (b) new areas to be colonised by mangroves, samphire and wetland species
 - (c) sand dune drift
 - (d) where appropriate, the removal of embankments that interfere with the abovementioned processes.

Design and Appearance

OBJECTIVES

- 1 Development of a high architectural standard that responds to and reinforces positive aspects of the local environment and built form.
- 2 Roads, open spaces, buildings and land uses laid out and linked so that they are easy to understand and navigate.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 The design of a building may be of a contemporary nature and exhibit an innovative style provided the overall form is sympathetic to the scale of development in the locality and with the context of its setting with regard to shape, size, materials and colour.
- 2 Buildings should be designed and sited to avoid creating extensive areas of uninterrupted walling facing areas exposed to public view.
- 3 Buildings should be designed to reduce their visual bulk and provide visual interest through design elements such as:
 - (a) articulation
 - (b) colour and detailing
 - (c) small vertical and horizontal components
 - (d) design and placing of windows
 - (e) variations to facades.
- 4 Building form should not unreasonably restrict existing views available from neighbouring properties and public spaces.
- 5 Transportable buildings and buildings which are elevated on stumps, posts, piers, columns or the like, should have their suspended footings enclosed around the perimeter of the building with brickwork or timber, and the use of verandas, pergolas and other suitable architectural detailing to give the appearance of a permanent structure.
- 6 The external walls and roofs of buildings should not incorporate highly reflective materials which will result in glare.
- 7 The external materials and colours of a building should not result in a detrimental impact upon the existing character of the locality.

Energy Efficiency

OBJECTIVES

- 1 Development designed and sited to conserve energy and minimise waste.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should provide for efficient solar access to buildings and open space all year around.
- 2 Buildings should be sited and designed so that the open spaces associated with the main activity areas face north for exposure to winter sun.
- 3 Buildings should be sited and designed to ensure adequate natural light and winter sunlight is available to the main activity areas of adjacent buildings.
- 4 Roof pitches should facilitate the efficient use of solar hot water services and photovoltaic cells.
- 5 Development should be designed to minimise consumption of non-renewable energy through designing the roof of buildings with a north facing slope to accommodate solar collectors.

Hazards

OBJECTIVES

- 1 Maintenance of the natural environment and systems by limiting development in areas susceptible to natural hazard risk.
- 2 Development located away from areas that are vulnerable to, and cannot be adequately and effectively protected from the risk of natural hazards.
- 3 Development located to minimise the threat and impact of bushfires on life and property.
- 4 Expansion of existing non-rural uses directed away from areas of high bushfire risk.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should:
 - (a) be excluded from areas that are vulnerable to, and cannot be adequately and effectively protected from, the risk of natural hazards
 - (b) be sited, designed and undertaken with appropriate precautions being taken against fire, flood, coastal flooding, storm surge, landslip, earthquake, toxic emissions or other hazards such as vermin
 - (c) not occur on land where the risk of flooding is likely to be harmful to safety or damage property.
- 2 There should not be any significant interference with natural processes in order to reduce the exposure of development to the risk of natural hazards.
- 3 The location of critical community facilities or key infrastructure in areas of high natural hazard risk should be avoided.

Flooding

- 4 Development should not be undertaken in areas liable to inundation by tidal, drainage or flood waters unless the development can achieve all of the following:
 - (a) it is developed with a public stormwater system capable of catering for a 1 in 100 year average return interval flood event
 - (b) buildings are designed and constructed to prevent the entry of floodwaters in a 1 in 100 year average return interval flood event.

Bushfire

- 5 The following bushfire protection principles of development control apply to development of land identified as General, Medium and High bushfire risk areas as shown on the *Bushfire Protection Area BPA Maps - Bushfire Risk*.
- 6 Development in a Bushfire Protection Area should be in accordance with those provisions of the *Minister's Code: Undertaking development in Bushfire Protection Areas* that are designated as mandatory for Development Plan Consent purposes.

- 7 Buildings and structures should be located away from areas that pose an unacceptable bushfire risk as a result of one or more of the following:
 - (a) vegetation cover comprising trees and/or shrubs
 - (b) poor access
 - (c) rugged terrain
 - (d) inability to provide an adequate building protection zone
 - (e) inability to provide an adequate supply of water for fire-fighting purposes.
- 8 Residential, tourist accommodation and other habitable buildings should:
 - (a) be sited on the flatter portion of allotments and avoid steep slopes, especially upper slopes, narrow ridge crests and the tops of narrow gullies, and slopes with a northerly or westerly aspect
 - (b) be sited in areas with low bushfire hazard vegetation and set back at least 20 metres from existing hazardous vegetation
 - (c) have a dedicated and accessible water supply available at all times for fire fighting.
- 9 Buildings and structures should be designed and configured to reduce the impact of bushfire through using simple designs that reduce the potential for trapping burning debris against the building or structure, or between the ground and building floor level in the case of transportable buildings.

Natural Resources

OBJECTIVES

- 1 Retention, protection and restoration of the natural resources and environment.
- 2 Protection of the quality and quantity of South Australia's surface waters, including inland, *marine and estuarine* and underground waters.
- 3 The ecologically sustainable use of natural resources including water resources, including *marine waters*, ground water, surface water and watercourses.
- 4 Natural hydrological systems and environmental flows reinstated, and maintained and enhanced.
- 5 Development consistent with the principles of water sensitive design.
- 6 Development sited and designed to:
 - (a) protect natural ecological systems
 - (b) achieve the sustainable use of water
 - (c) protect water quality, including receiving waters
 - (d) reduce runoff and peak flows and prevent the risk of downstream flooding
 - (e) minimise demand on reticulated water supplies
 - (f) maximise the harvest and use of stormwater
 - (g) protect stormwater from pollution sources.
- 7 Storage and use of stormwater which avoids adverse impact on public health and safety.
- 8 Native flora, fauna and ecosystems protected, retained, conserved and restored.
- 9 Restoration, expansion and linking of existing native vegetation to facilitate habitat corridors for ease of movement of fauna.
- 10 Minimal disturbance and modification of the natural landform.
- 11 Protection of the scenic qualities of natural and rural landscapes.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should be undertaken with minimum impact on the natural environment, including air and water quality, land, soil, biodiversity, and scenically attractive areas.
- 2 Development should ensure that South Australia's natural assets, such as biodiversity, water and soil, are protected and enhanced.
- 3 Development should not significantly obstruct or adversely affect sensitive ecological areas such as creeks, wetlands, estuaries and significant seagrass and mangrove communities.
- 4 Development should be appropriate to land capability and the protection and conservation of water resources and biodiversity.

Water Sensitive Design

- 5 Development should be designed to maximise conservation, minimise consumption and encourage re-use of water resources.
- 6 Development should not take place if it results in unsustainable use of surface or underground water resources.
- 7 Development should be sited and designed to:
 - (a) capture and re-use stormwater, where practical
 - (b) minimise surface water runoff
 - (c) prevent soil erosion and water pollution
 - (d) protect and enhance natural water flows
 - (e) protect water quality by providing adequate separation distances from watercourses and other water bodies
 - (f) not contribute to an increase in salinity levels
 - (g) avoid the water logging of soil or the release of toxic elements
 - (h) maintain natural hydrological systems and not adversely affect:
 - (i) the quantity and quality of groundwater
 - (ii) the depth and directional flow of groundwater
 - (iii) the quality and function of natural springs.
- 8 Water discharged from a development site should:
 - (a) be of a physical, chemical and biological condition equivalent to or better than its pre-developed state
 - (b) not exceed the rate of discharge from the site as it existed in pre-development conditions.
- 9 Development should include stormwater management systems to protect it from damage during a minimum of a 1-in-100 year average return interval flood.
- 10 Development should have adequate provision to control any stormwater over-flow runoff from the site and should be sited and designed to improve the quality of stormwater and minimise pollutant transfer to receiving waters.
- 11 Development should include stormwater management systems to mitigate peak flows and manage the rate and duration of stormwater discharges from the site to ensure the carrying capacities of downstream systems are not overloaded.
- 12 Development should include stormwater management systems to minimise the discharge of sediment, suspended solids, organic matter, nutrients, bacteria, litter and other contaminants to the stormwater system.
- 13 Stormwater management systems should preserve natural drainage systems, including the associated environmental flows.

- 14 Stormwater management systems should:
- (a) maximise the potential for stormwater harvesting and re-use, either on-site or as close as practicable to the source
 - (b) utilise, but not be limited to, one or more of the following harvesting methods:
 - (i) the collection of roof water in tanks
 - (ii) the discharge to open space, landscaping or garden areas, including strips adjacent to car parks
 - (iii) the incorporation of detention and retention facilities
 - (iv) aquifer recharge.
- 15 Where it is not practicable to detain or dispose of stormwater on site, only clean stormwater runoff should enter the public stormwater drainage system.

Water Catchment Areas

- 16 Development should ensure watercourses and their beds, banks, wetlands and floodplains are not damaged or modified and are retained in their natural state, except where modification is required for essential access or maintenance purposes.
- 17 Development such as cropping, intensive animal keeping, residential, tourism, industry and horticulture, that increases the amount of surface run-off should include a strip of land at least 20 metres wide measured from the top of existing banks on each side of a watercourse that is:
- (a) fenced to exclude livestock
 - (b) kept free of development, including structures, formal roadways or access ways for machinery or any other activity causing soil compaction or significant modification of the natural surface of the land, **unless no other access is available**
 - (c) revegetated with locally indigenous vegetation comprising trees, shrubs and other groundcover plants to filter run-off so as to reduce the impacts on native aquatic ecosystems and to minimise soil loss eroding into the watercourse.
- 18 **Outside of zones provided for urban purposes, unsewered development with:**
- (a) **low pollution potential, such as dwellings, should be located at least 50 metres from any watercourse**
 - (b) **high pollution potential, including industry and intensive animal keeping, should be located at least:**
 - (i) **200 metres from a major watercourse (third order or higher stream)**
 - (ii) **100 metres from any other watercourse.**
- 19 Development should comply with the current *Environment Protection (Water Quality) Policy*.

Biodiversity and Native Vegetation

- 20 Development should retain existing areas of native vegetation and where possible contribute to revegetation using locally indigenous plant species.
- 21 Development should be designed and sited to minimise the loss and disturbance of native flora and fauna, including marine animals and plants, and their breeding grounds and habitats.
- 22 Native vegetation should be conserved and its conservation value and function not compromised by development if the native vegetation does any of the following:
 - (a) provides an important habitat for wildlife or shade and shelter for livestock
 - (b) has a high plant species diversity or includes rare, vulnerable or endangered plant species or plant associations and communities
 - (c) provides an important seed bank for locally indigenous vegetation
 - (d) has high amenity value and/or significantly contributes to the landscape quality of an area, including the screening of buildings and unsightly views
 - (e) has high value as a remnant of vegetation associations characteristic of a district or region prior to extensive clearance for agriculture.
 - (f) is growing in, or is characteristically associated with a wetland environment.
- 23 Native vegetation should not be cleared if such clearing is likely to lead to, cause or exacerbate any of the following:
 - (a) erosion or sediment within water catchments
 - (b) decreased soil stability
 - (c) soil or land slip
 - (d) deterioration in the quality of water in a watercourse or surface water runoff
 - (e) a local or regional salinity problem
 - (f) the occurrence or intensity of local or regional flooding.
- 24 Development that proposes the clearance of native vegetation should address or consider the implications that removing the native vegetation will have on the following:
 - (a) provision for linkages and wildlife corridors between significant areas of native vegetation
 - (b) erosion along watercourses and the filtering of suspended solids and nutrients from run-off
 - (c) the amenity of the locality
 - (d) bushfire safety
 - (e) the net loss of native vegetation and other biodiversity.
- 25 Where native vegetation is to be removed, it should be replaced in a suitable location on the site with locally indigenous vegetation to ensure that there is not a net loss of native vegetation and biodiversity.

- 26 Development should be located and occur in a manner which:
- (a) does not increase the potential for, or result in, the spread of pest plants, or the spread of any non-indigenous plants into areas of native vegetation or a conservation zone
 - (b) avoids the degradation of remnant native vegetation by any other means including as a result of spray drift, compaction of soil, modification of surface water flows, pollution to groundwater or surface water or change to groundwater levels
 - (c) incorporates a separation distance and/or buffer area to protect wildlife habitats and other features of nature conservation significance.
- 27 Development should promote the long-term conservation of vegetation by:
- (a) avoiding substantial structures, excavations, and filling of land in close proximity to the trunk of trees and beneath their canopies
 - (b) minimising impervious surfaces beneath the canopies of trees
 - (c) taking other effective and reasonable precautions to protect both vegetation and the integrity of structures and essential services.

Open Space and Recreation

OBJECTIVES

- 28 A wide range of settings for active and passive recreational opportunities.

PRINCIPLES OF DEVELOPMENT CONTROL

- 29 Public open space and recreation areas should be of a size, dimension and location that:
- (a) facilitate a range of formal and informal recreation activities to meet the needs of the community
 - (b) provide for the movement of pedestrians and cyclists
 - (c) incorporate existing vegetation and natural features, watercourses, wildlife habitat and other sites of natural or cultural value
 - (d) link habitats, wildlife corridors, public open spaces and existing recreation facilities
 - (e) enable effective stormwater management
 - (f) provides for the planting and retention of large trees and vegetation.
- 30 Recreation facilities development should be sited and designed to minimise negative impacts on the amenity of the locality.

Siting and Visibility

OBJECTIVES

- 1 Protection of scenically attractive areas, particularly natural, rural and coastal landscapes.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should be sited and designed to minimise its visual impact on:
 - (a) the natural, rural or heritage character of the area
 - (b) areas of high visual or scenic value, particularly rural and coastal areas
 - (c) views from the coast, near-shore waters, public reserves, tourist routes and walking trails
 - (d) the amenity of public beaches.
- 2 Buildings should be sited in unobtrusive locations and, in particular, should:
 - (a) be grouped together
 - (b) where possible be located in such a way as to be screened by existing vegetation when viewed from public roads.
- 3 Buildings outside of urban areas and in undulating landscapes should be sited in unobtrusive locations and in particular should be:
 - (a) sited below the ridgeline
 - (b) sited within valleys or behind spurs
 - (c) sited in such a way as to not be visible against the skyline when viewed from public roads
 - (d) set well back from public roads, particularly when the allotment is on the high side of the road.
- 4 Buildings and structures should be designed to minimise their visual impact in the landscape, in particular:
 - (a) the profile of buildings should be low and the rooflines should complement the natural form of the land
 - (b) the mass of buildings should be minimised by variations in wall and roof lines and by floor plans which complement the contours of the land
 - (c) large eaves, verandas and pergolas should be incorporated into designs so as to create shadowed areas that reduce the bulky appearance of buildings.
- 5 The nature of external surface materials of buildings should not detract from the visual character and amenity of the landscape.
- 6 The number of buildings and structures on land outside of urban areas should be limited to that necessary for the efficient management of the land.

Sloping Land

OBJECTIVES

- 1 Development on sloping land designed to minimise environmental and visual impacts and protect soil stability and water quality.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development and associated driveways and access tracks should be sited and designed to integrate with the natural topography of the land and minimise the need for earthworks.
- 2 Development and associated driveways and access tracks, including related earthworks, should be sited, designed and undertaken in a manner that:
 - (a) minimises their visual impact
 - (b) reduces the bulk of the buildings and structures
 - (c) minimises the extent of excavation and fill
 - (d) minimises the need for, and the height of, retaining walls
 - (e) does not cause or contribute to instability of any embankment or cutting
 - (f) avoids the silting of watercourses
 - (g) protects development and its surrounds from erosion caused by water run-off.
- 3 Driveways and access tracks across sloping land should be accessible and have a safe, all-weather trafficable surface.
- 4 Development sites should not be at risk of landslip.
- 5 Development on steep land should include site drainage systems to minimise erosion and avoid adverse impacts on slope stability.
- 6 Steep sloping sites in unsewered areas should not be developed unless the physical characteristics of the allotments enable the proper siting and operation of an effluent drainage field suitable for the development intended.
- 7 The excavation and/or filling of land outside townships and urban areas should:
 - (a) be kept to a minimum and be limited to a maximum depth or height no greater than 1.5 metres so as to preserve the natural form of the land and the native vegetation
 - (b) only be undertaken in order to reduce the visual impact of buildings, including structures, or in order to construct water storage facilities for use on the allotment
 - (c) only be undertaken if the resultant slope can be stabilised to prevent erosion
 - (d) result in stable scree slopes which are covered with top soil and landscaped so as to preserve and enhance the natural character or assist in the re-establishment of the natural character of the area.

Tourism Development

OBJECTIVES

- 1 Environmentally sustainable and innovative tourism development.
- 2 Tourism development that assists in the conservation, interpretation and public appreciation of significant natural and cultural features including State or local heritage places.
- 3 Tourism development that sustains or enhances the local character, visual amenity and appeal of the area.
- 4 Tourism development that protects areas of exceptional natural value, allows for appropriate levels of visitation, and demonstrates a high quality environmental analysis and design response which enhances environmental values.
- 5 Tourism development in rural areas that does not adversely affect the use of agricultural land for primary production.
- 6 Tourism development that contributes to local communities by adding vitality to neighbouring townships, regions and settlements.
- 7 Increased opportunities for visitors to stay overnight.
- 8 Ensure new development, together with associated bushfire management minimise the threat and impact of bushfires on life and property while protecting the environment.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Tourism development should have a functional or locational link with its natural, cultural or historical setting.
- 2 Tourism development and any associated activities should not damage or degrade any significant natural and cultural features.
- 3 Tourism development should ensure that its scale, form and location will not overwhelm, over commercialise or detract from the intrinsic natural values of the land on which it is sited or the character of its locality.
- 4 Tourism development should, where appropriate, add to the range of services and accommodation types available in an area.
- 5 Any upgrading of infrastructure to serve tourism development should be consistent with the landscape and the intrinsic natural values of the land and the basis of its appeal.

Tourism Development Outside Townships and Settlements

- 6 Tourist developments located within areas of high conservation value, high indigenous cultural value, high landscape quality or significant scenic beauty should demonstrate excellence in design to minimise potential impacts or intrusion.

- 7 Buildings and structures to accommodate tourists and associated activities should:
- (a) not exceed a building height of 6.5 metres (from natural ground level)
 - (b) have a minimum setback of 100 metres from any of the following:
 - (i) public roads or be no closer to a public road than existing buildings on the subject land, whichever is the lesser
 - (ii) adjoining allotment boundaries
 - (iii) the high water mark
 - (iv) cliff facesunless it can be demonstrated that a lesser setback would achieve one or more of the following:
 - (v) will achieve a superior outcome in respect to the requirements of the relevant zone, policy area or precinct than if the minimum setback was applied
 - (vi) would assist in avoiding areas of high value remnant native vegetation
 - (vii) would provide a comparatively safer location in respect to exposure to bushfire hazard, including along access roadways
 - (viii) would not result in unacceptable exposure to coastal flood and erosion process or stormwater inundation.
- 8 Development providing accommodation for tourists should be designed to minimise the potential for buildings to be converted into or used as a dwelling(s) where:
- (a) if the development comprises multiple tourist accommodation units – by ensuring that facilities, access driveways, parking areas, amenities and the like are shared
 - (b) if the development involves a single accommodation unit on a site or allotment in the **Coastal Conservation Zone, Conservation Zone or Water Protection Zone**, one or more of the following characteristics is evident:
 - (i) the structure provides basic shelter and limited internal space (eg cabin, hikers-hut)
 - (ii) one or more of the functional areas typically found in a dwelling (eg, laundry, kitchen) is absent
 - (iii) the structure is of a temporary or semi-permanent nature.
- 9 Development comprising multiple tourist accommodation units (including any facilities and activities for use by guests and visitors, including conference facilities) should:
- (a) ensure buildings and structures are clustered on the same allotment
 - (b) for larger scale developments (ie those proposing or resulting in more than 25 accommodation units), have direct or convenient access to a sealed public road.
- 10 Where appropriate, tourism developments in areas outside townships and settlements should:
- (a) adapt and upgrade existing buildings of heritage value
 - (b) seek to improve conditions in disturbed or degraded areas on the site.

- 11 Tourism development, particularly in remote areas should be designed to minimise energy and water demands and incorporate alternative, sustainable technologies that use renewable energy sources and/or treat and reuse stormwater and wastewater to minimise reliance on mains services.
- 12 Natural features, signs and walkways should be used to manage and minimise potential risks of visitors damaging areas of cultural or natural significance, fragile areas, and areas of highest environmental value.
- 13 The visual and ambient impact of vehicles should be minimised by placing roadways and parking areas in unobtrusive locations.

Transportation and Access

OBJECTIVES

- 14 Development that:
- (a) provides safe and efficient movement for all motorised and non-motorised transport modes
 - (b) ensures access for vehicles including emergency services, public infrastructure maintenance and commercial vehicles
 - (c) provides off street parking
 - (d) is appropriately located so that it supports and makes best use of existing transport facilities and networks.

PRINCIPLES OF DEVELOPMENT CONTROL

Access

- 15 Development should have direct access from an all weather public road.
- 16 Development should be provided with safe and convenient access which:
- (a) avoids unreasonable interference with the flow of traffic on adjoining roads
 - (b) accommodates the type and volume of traffic likely to be generated by the development or land use
 - (c) is sited and designed to minimise any adverse impacts on the occupants of and visitors to neighbouring properties.
- 17 Development should not restrict access to publicly owned land.
- 18 Driveways, access tracks and parking areas should be designed and constructed to:
- (a) follow the natural contours of the land
 - (b) minimise excavation and/or fill
 - (c) minimise the potential for erosion from run-off
 - (d) avoid the removal of existing vegetation
 - (e) be consistent with *Australian Standard AS 2890 Parking facilities*.

Access for People with Disabilities

- 19 Development should be sited and designed to provide convenient access for people with a disability.
- 20 Where appropriate and practical, development should provide for safe and convenient access to the coast and beaches for disabled persons.

Waste

OBJECTIVES

- 1 Development that, in order of priority, avoids the production of waste, minimises the production of waste, reuses waste, recycles waste for reuse, treats waste and disposes of waste in an environmentally sound manner.
- 2 Development that includes the treatment and management of solid and liquid waste to prevent undesired impacts on the environment including, soil, plant and animal biodiversity, human health and the amenity of the locality.

PRINCIPLES OF DEVELOPMENT CONTROL

- 1 Development should be sited and designed to prevent or minimise the generation of waste (including wastewater) by applying the following waste management hierarchy in the order of priority as shown below:
 - (a) avoiding the production of waste
 - (b) minimising waste production
 - (c) reusing waste
 - (d) recycling waste
 - (e) recovering part of the waste for re-use
 - (f) treating waste to reduce the potentially degrading impacts
 - (g) disposing of waste in an environmentally sound manner.
- 2 The storage, treatment and disposal of waste materials from any development should be achieved without risk to health or impairment of the environment.
- 3 Development should avoid or minimise as far as practical, the discharge or deposit of waste (including wastewater) onto land or into any waters (including processes such as seepage, infiltration or carriage by wind, rain, sea spray, stormwater or by the rising of the water table).
- 4 Untreated waste should not be discharged to the environment, and in particular to any water body.
- 5 Development should include appropriately sized area to facilitate the storage of receptacles that will enable the efficient recycling of waste.

Waste Treatment Systems

- 6 Development that produces any effluent should be connected to an approved waste treatment system which may include sewage, community wastewater management systems, or on-site wastewater treatment and disposal methods.

- 7 The methods for, and siting of, effluent and waste storage, treatment and disposal systems should minimise the potential for environmental harm and adverse impacts on:
 - (a) the quality of surface and groundwater resources
 - (b) public health
 - (c) the amenity of a locality
 - (d) sensitive land uses.
- 8 Waste treatment should only occur where the capacity of the treatment facility is sufficient to accommodate likely maximum daily demands including a contingency for unexpected high flows and breakdowns.
- 9 Any domestic waste treatment system or effluent drainage field should be located within the allotment of the development that it will service.
- 10 A dedicated on-site effluent disposal area should not include any areas to be used for, or could be reasonably foreseen to be used for, private outdoor open space, driveways, car parking or outbuildings.

DEVELOPMENT PLAN PROVISIONS