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Dear Tegan

DA 24036351 – tourist accommodation (glamping tent) at 2794 South Coast Road, Foul Bay

URPS acts for the landowner Xenia Doorenbosch and the Project Manager Guy Henderson.

This letter provides a brief statement of support for Development Application 24036351, being for tourist accommodation in the form of a glamping tent at 2794 South Coast Road, Foul Bay.

In the current Planning and Design Code, tourist accommodation is a restricted form of development in the Conservation Zone (the site is not in the Visitor Experience Subzone or a national park where it would be performance assessed).

Practice Direction 4 provides guidance on how restricted development is to be processed by the State Planning Commission. Clause 5(1) states:

For the purposes of section 109(1)(a)(i) of the Act, the Commission, acting through its delegate under section 30(3) of the Act, will proceed to assess an application for restricted development unless it appears to the delegate that there is no reasonable prospect of a favourable assessment. (our underlining added)

This statement describes the background, subject land and merits of the proposal to warrant a decision to proceed to an assessment.

Background

On 9 September 2020, Planning Consent was granted to DA 544/1086/2020, for a 'detached dwelling, garage & 3 rain water tanks' at 2794 South Coast Road, Foul Bay. It was a non-complying development under the former *Development Act 1993* and Yorke Peninsula Council Development Plan, with concurrence gained from the State Planning Commission and referral support from the Coast Protection Board.

On 20 December 2024, the Yorke Peninsula Council extended this Planning Consent until 9 September 2025, to allow time for amended dwelling plans to be submitted as a variation. A variation DA (25026547) was submitted on 27 August 2025, which also requests a further extension of the Planning Consent to enable time to arrange the Building Consent and wastewater system approval under the SA Public Health Act.

A separate DA 24036351 was submitted on 24 October 2024 to the State Planning Commission (SPC), seeking Planning Consent for a detached dwelling and tourist accommodation (glamping tent). That DA was identified as a restricted development under the Code and the PDI Act. We have since been engaged to assist with the planning application and together with the Project Manager Guy Henderson, have been liaising with the SPC staff. This DA is now amended to be for the glamping tent only, as the detached dwelling element is being separately assessed in the variation DA 25026547.

Subject Land and Locality

2794 South Coast Road, Foul Bay is also noted as Section 1 in HP 130200 and Certificate of Title Volume 5384 Folio 889, shown below as Figure 1. It is 37.03ha in area. The northern part of the site is in the Rural Zone and the southern part is in the Conservation Zone.

Figure 1 – Subject land and zone boundaries



The approved dwelling site subject to the variation DA 25026547 is within the Conservation Zone in the southwest portion of the land, just over 100m from the southern boundary with the coast. It is accessed from an existing gate to South Coast Road close to the western boundary.

The proposed site of the glamping tent is also within the Conservation Zone, to the east of the dwelling site.

The land has a history of use for farming purposes. It is understood from documentation in the 2020 dwelling application that the land was used for cropping (barley) until 2015. The owners at the time then entered into a land management agreement with the then Department for Environment, Water and Natural Resources to revegetate and improve biodiversity on certain areas of the land (noting this is not a Land Management Agreement pursuant to the PDI Act).

Proposal

The proposed glamping tent is a form of tourist accommodation, defined in Part 7 of the Code as:

Means premises in which temporary or short-term accommodation is provided to travellers on a commercial basis.

This use may also include:

- a) onsite services and facilities primarily for the use by guests;***
- b) facilities for the management of the accommodation.***

The proposal includes:

- a new access point to South Coast Road with a direct driveway to the glamping tent, positioned to avoid/minimise impacts on native vegetation
- the glamping tent sited 100m from the southern boundary to the coast and 247m from the eastern boundary
- a vehicle turnaround and car parking area with a 22,000L water tank adjacent to the glamping tent
- the glamping tent constructed on an elevated deck, approximately 100sqm in area and 5.25m high to the roof peak. It can accommodate one family with a kitchen and bathroom facilities
- a wastewater system to the southeast of the tent in accordance with the plans and report from Mace Engineering Services.

Assessment

The following Code provisions are considered to be most relevant for the decision to proceed to assess the development application for tourist accommodation in the form of a glamping tent:

Conservation Zone

DO 1 - The conservation and enhancement of the natural environment and natural ecological processes for their ability to reduce the effects of climate change, for their historic, scientific, landscape, habitat, biodiversity, carbon storage and cultural values and provision of opportunities for the public to experience these through low-impact recreational and tourism development.

PO 1.1 - Small-scale, low-impact land uses that provide for the conservation and protection of the area, while allowing the public to experience these important environmental assets.

PO 1.2 – Development is primarily in the form of:

- a) directional, identification and/or interpretative advertisements and/or advertising hoardings for conservation management and tourist information purposes**
- b) scientific monitoring structures or facilities**
- c) a small-scale facility associated with the interpretation and appreciation of natural and cultural heritage such as public amenities, camping grounds, remote shelters or huts**
- d) structures for conservation management purposes.**

PO 4.1 - Development is sited and designed unobtrusively to minimise the visual impact on the natural environment by:

- a) using low-reflective materials and finishes that blend with, and colours that complement, the surrounding landscape**
- b) being located below hilltops and ridgelines**
- c) being screened by existing vegetation.**

PO 4.2 - Development is sited and designed to minimise impacts on the natural environment by:

- a) containing construction and built form within a tightly defined site boundary**
- b) minimising the extent of earthworks.**

PO 4.3 - Recreation or visitor facilities are located in publicly accessible areas in proximity to existing recreation trails to minimise impact on the natural environment.

PO 4.4 - Development does not obscure existing public views to landscape, river or seascape features and is not visibly prominent from key public vantage points, including public roads or car parking areas.

PO 5.2 - Roads and vehicle access ways are located to minimise vegetation clearance and are constructed of permeable materials.

The glamping tent is a very small-scale, low impact land use that will not be visible from the surrounding area. It is on a 37ha allotment, hundreds of metres from the road and other boundaries. It will allow for appreciation of the natural and rural environment, being associated with the conservation efforts on the land and close to the beach.

Rural Zone

Although the glamping tent is to be within the Conservation Zone, the land, including the vehicle access track to the tent, is also within the Rural Zone. Tourist accommodation is performance assessed rather than restricted in the Rural Zone, and the following provisions are particularly relevant:

DO 2 - A zone supporting diversification of existing businesses that promote value-adding such as industry, storage and warehousing activities, the sale and consumption of primary produce, tourist development and accommodation.

PO 1.1 - The productive value of rural land for a range of primary production activities and associated value adding, processing, warehousing and distribution is supported, protected and maintained.

DPF 1.1 - Development comprises one or more of the following:

(w) tourist accommodation

PO 2.1 - Development is provided with suitable vehicle access.

DPF 2.1 - Development is serviced by an all-weather trafficable public road.

PO 6.3 - Tourist accommodation is associated with the primary use of the land for primary production or primary production related value adding industry to enhance and provide authentic visitor experiences.

DPF 6.3 - Tourist accommodation:

- a) is ancillary to and located on the same allotment or an adjoining allotment used for primary production or primary production related value adding industry***
- b) in relation to the area used for accommodation:***
 - i. where in a new building, or buildings, does not exceed a cumulative total floor area of 100m²***
or
 - ii. where in an existing building, does not exceed a total floor area of 150m²***
and

- c) *does not result in more than one tourist accommodation facility being located on the same allotment.*

PO 6.4 - Tourist accommodation proposed in a new building or buildings is sited, designed and of a scale that maintains a pleasant rural character and amenity.

DPF 6.4 - Tourist accommodation in new buildings:

is set back from all allotment boundaries by at least 40m

has a building height that does not exceed 7m above natural ground level.

Suitable vehicle access is available from South Coast Road as an all-weather trafficable public road. The access track to the glamping tent site will avoid native vegetation. Although the glamping tent is sited in the Conservation Zone, it satisfies the guidance from the Rural Zone in terms of building scale, height and setbacks from allotment boundaries.

Coastal Areas Overlay

DO 1 - The natural coastal environment (including environmentally important features such as mangroves, wetlands, saltmarsh, sand dunes, cliff tops, native vegetation, wildlife habitat, shore and estuarine areas) is conserved and enhanced.

DO 2 - Provision is made for natural coastal processes; and recognition is given to current and future coastal hazards including sea level rise, flooding, erosion and dune drift to avoid the need, now and in the future, for public expenditure on protection of the environment and development.

Like the approved dwelling on the land, the glamping tent is sited 100m from the southern boundary with the coast. It will have a negligible impact on the coastal environment and is easily relocated in the future if ever needed due to sea level rise.

Hazards (Bushfire – Medium Risk) Overlay

DO 1 - Development, including land division responds to the medium level of bushfire risk and potential for ember attack and radiant heat by siting and designing buildings in a manner that mitigates the threat and impact of bushfires on life and property taking into account the increased frequency and intensity of bushfires as a result of climate change.

DO 2 - To facilitate access for emergency service vehicles to aid the protection of lives and assets from bushfire danger.

Similar to the approved dwelling, the glamping tent is sited away from hazardous bushland vegetation. It will have a suitable access and turnaround area for CFS vehicles, and the necessary water supply and fire-fighting equipment in accordance with the Code Overlay and Ministerial Building Standard MBS 008 - Designated bushfire prone areas - additional requirements. The Building Consent process will also ensure the relevant standards will be achieved under the National Construction Code.

A bushfire management plan can be part of the tourist accommodation operation, prepared in consultation with the Country Fire Service.

Native Vegetation Overlay

DO 1 - Areas of native vegetation are protected, retained and restored in order to sustain biodiversity, threatened species and vegetation communities, fauna habitat, ecosystem services, carbon storage and amenity values.

As above, the siting of the glamping tent and access will generally avoid native vegetation. If the SPC considers it necessary, further evidence of this can be provided on request, following a decision to proceed to an assessment.

General Development Policies - Tourism Development

DO 1 - Tourism development is built in locations that cater to the needs of visitors and positively contributes to South Australia's visitor economy.

PO 1.1 - Tourism development complements and contributes to local, natural, cultural or historical context where:

- a) it supports immersive natural experiences***
- b) it showcases South Australia's landscapes and produce***
- c) its events and functions are connected to local food, wine and nature.***

The proposed tourist accommodation in the form of a glamping tent satisfies the above provisions. It will cater to the needs of visitors, contribute to the state's visitor economy, support immersive natural experiences, and showcase South Australia's landscape.

Conclusion

The proposal is for tourist accommodation in the form of a glamping tent. It is a restricted development in the Conservation Zone but is not seriously at variance with the Planning and Design Code.

Sufficient merit is demonstrated to allow the SPC to proceed with an assessment. That will allow for the process to include public notification and agency referrals, including to the Coast Protection Board.

Please contact me via 0411 258 090 or bvictory@urps.com.au for any questions.

Yours sincerely



Ben Victory
Principal Consultant