



23 June 2026

Duncan Shearer
State Commission Assessment Panel

By Planning Portal

Dear Duncan

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COAST PROTECTION BOARD Development Applications
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Development Application No	24036351
Applicant	Dr X. Doorenbosch
Description	Glamping Tent, road access, storm water & septic system
Zones/Overlay	Rural and Conservation Zone/Coastal Areas Overlay
Location	2794 South Coast Rd Foul Bay
Council	Yorke Peninsula Council

I refer to the above development application forwarded to the Coast Protection Board (the Board) pursuant to Section 122(1) of the *Planning, Development and Infrastructure Act* (PDI Act) 2016.

The following response is provided by the Board in compliance with its policies. Those policies are contained in the Board's Policy Document which is located on the following website:

<https://cdn.environment.sa.gov.au/environment/docs/CPB-Policy-October-2022.pdf>

Proposal

The proposed development is for a single tourist accommodation unit (glamping tent) with accompanying vehicle access, pedestrian pathway, carparking, wastewater system and water tank. The property is partly in the Rural Zone and partly in the Conservation Zone and Coastal Areas Overlay, where the proposed development would be located.

The property was revegetated at the cessation of agricultural activities by the previous owner under a Land Management Agreement, which has re-established dense patches of native vegetation throughout the southern end of the property.

The Board notes earlier plans made in October 2024 to March 2025 for a dwelling and advises this assessment is confined to the proposed tourism accommodation documented in plans from April 2026.



Figure 1 - Location of proposed development within Coastal Areas Overlay

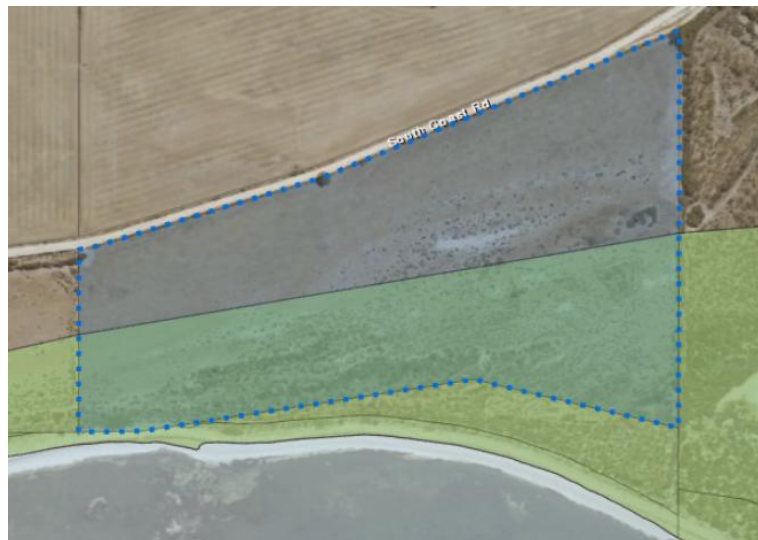


Figure 2 - Location of proposed development within Conservation Zone

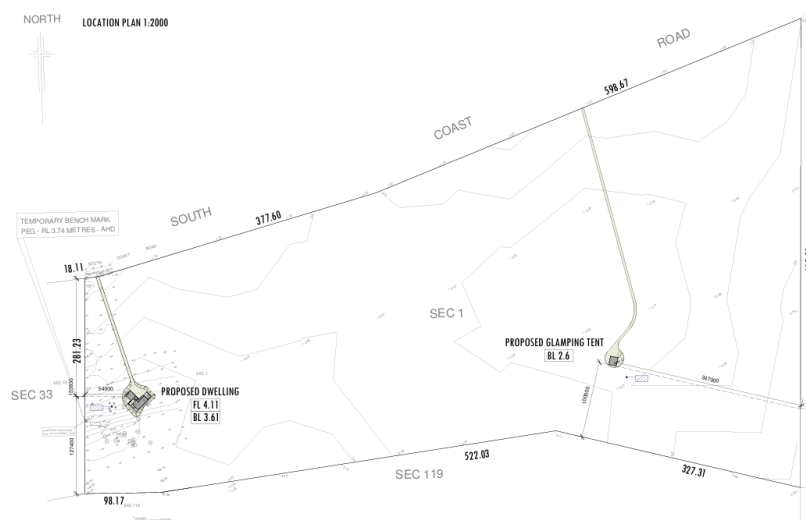


Figure 3 - Proposed location (Site Plan)

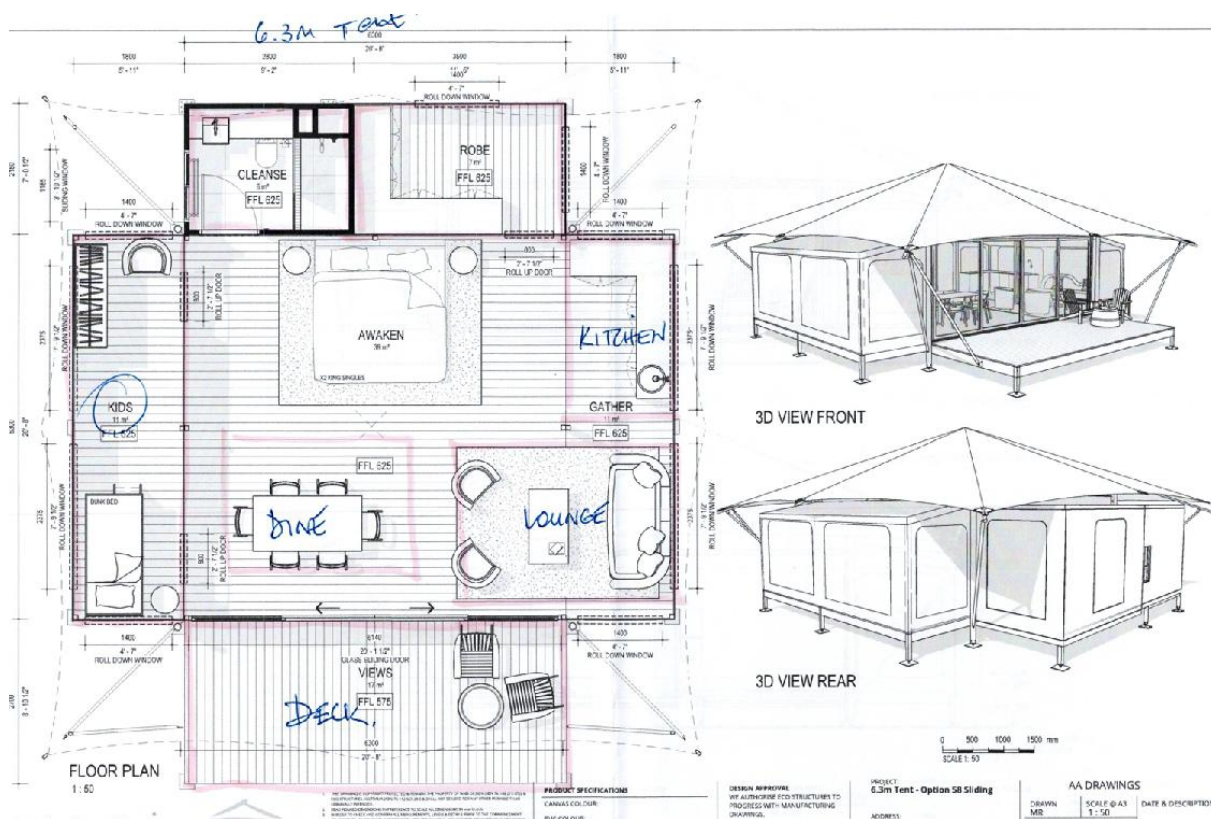


Figure 4 - Proposed development (Floor Plan)

Discussion

Coast Protection Board Policy

As per the Coast Protection Board's Policy Document 2022, the Board seeks to:

- Retain coastal open space;
- Minimise impacts of development on the coast;
- Maintain compact coastal settlements and restraining 'sprawl' along the coastline;
- Protect scenic amenity;
- Protect coastal biodiversity;
- Enable planning and delivery of adaptation measures to the foreseeable impacts of climate change on coastal development, environments and uses;
- Minimise or stop development in areas subject to coastal hazards (including coastal flooding, erosion, dune drift and acid sulphate soils);
- Minimise future protection costs by ensuring new development satisfies the Board's flooding and erosion policies; and
- Conserve developed coastal areas

Coastal Environment/Biodiversity

Coast Protection Board Policy 1.4 (f):

“Ensure that the siting and design of development on the coast minimises its impact on the environment, heritage and visual amenity

The Board seeks to minimise environmental impacts in coastal areas, particularly those associated with increased visitation. The proposed development increases human activity on the site and incorporates proposed pedestrian access to the coast which may increase impact to local fauna and flora. The site includes largely dense patches of native vegetation which acts as a green corridor for the traversing of fauna across the coastline that may utilise this habitat for shelter, natural resources and breeding. The Board notes that the neighbouring coastlines adjacent to the site have recorded sightings of Hooded Plovers (*Thinornis cucullatus*) which is a vulnerable species under threat from human activity.

It is important that visitors are aware of their potential environmental impacts including navigation, compatible activities, appropriate behaviours and etiquettes within the Conservation Zone. Care should also be taken not to impact any native vegetation or biodiversity on site, from unnecessary trampling, scouring and human activities.

To minimise impacts, the applicant is required to provide a ‘Guest Information Pack’ to guests with every booking. This should detail environmental and visitor management guidelines, including minimising environmental impacts, navigation within the Conservation Zone and species listings including specific information on Hooded Plovers.

Excavation and construction associated with the proposed development shall be carried out in a manner which minimises environmental impacts. Any future imported substrate material or engineered fill shall be free of weeds and pathogens to ensure that noxious weed or contamination sources are not introduced into the coastal environment.

Any landscaping shall use local native coastal species, avoiding the spread of exotic plants on the coast. The Northern and Yorke Natural Resources Management Board should be contacted if the applicant requires expert advice including the development of a suitable species list. However, general information can be found in the Coastal Garden Planting Guide found on the following website: [NY-Coastal-Gardens-Planting-Guide.pdf](#)

The applicant is reminded of their general environmental duty, as required by Section 25 of the *Environment Protection Act (1993)*, to take all reasonable and practical measures to ensure that the activities on the whole site, including during construction, do not cause environmental harm.

Coastal Access

Coast Protection Board Policy 6.1 (a):

“Environmentally sustainable access to the coast. [In doing so the Board will take into consideration:

- *The ability of the particular landform to cater for uses without undue adverse environmental effects;*

- *Preference to public use over private use*
- *Preference will be given to those uses which by their nature, need to be located close to the coast, and*
- *Public safety.]”*

The Board supports environmentally sustainable access to the coast in appropriate locations. In doing so, the Board will take into consideration the ability of the landform to cope with the visitation envisaged.

The proposed site and coastal pedestrian access is within a Conservation Zone, where damage and erosion from trampling and dispersal of weeds from foot traffic can have an impact on the coastal environment.

Application information indicates a relatively low number (maximum of one family or 2-4 people) of guests on site, who would access the beach via a proposed pedestrian path following existing natural pathways to the extent possible, pruning vegetation to maintain safe access. It is important that pedestrian tracks leading to the coastline are well formed and managed (single profile), with clear signage and directions to prevent alternative access and user safety.

The proposed pedestrian accessway should be detailed within the visitor management guidelines (Guest Information Pack) outlining designated pathways and navigation across the site. To prevent alternative paths being established within the Conservation Zone, the applicant shall provide clear signage in suitable locations to guide visitors to and from the beach. The applicant should also consider defining or directing guests in between entry and return paths.

The Board considers the landform to be capable of catering for the low visitation expected, provided the pathway is well formed, managed and signed to minimise alternative access and ensure visitor safety.

Coastal Flooding & Erosion

Coast Protection Board Policy 1.4(b):

“The Board will seek to minimise the exposure of new and existing development to risk of damage from coastal hazards and risks to development on the coast.”

Coast Protection Board Policy 1.4(e):

“The Board will seek to have adequate buffer distances between development and the coast”

The development is set back a sufficient distance (190m) from the coastline and provides an adequate erosion buffer up to 2100 levels.

For compliance with the Board’s coastal flooding risk standard, minimum Building site (BL) and Finished Floor Levels (FFL) of 2.9m and 3.15m AHD respectively, are generally required at this location. These levels allow for a 1% Annual Exceedance Probability (AEP) sea flood level (tide, stormwater and associated wave effects combined) and 0.30m of sea level rise to year 2050.

Board policy also requires that the development is capable, by reasonably practical means, of being protected or raised to withstand a further 0.7m of sea level rise to 2100.

Application information indicates a BL and FFL of 2.6m and 6.25m, respectively. The FFL comfortably meets the Boards requirements noting the building level is marginally below the Boards recommended levels, however the Board does not object given the relatively minor nature of the structure and low risk of being exposed to coastal flooding from adjacent land.

Orderly Development

Coast Protection Board Policy 1.5(a):

“The Coast Protection Board opposes 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.”*

The Board encourages development to be clustered along the coast within existing developed areas or appropriately chosen nodes, with an exception for tourist accommodation that provides significant environmental benefit.

The proposed location is not sited within a planned coastal settlement area, although the scale and intensity of the proposed tourism development is relatively minor, where appropriately managed small scale visitor facilities can be considered. Furthermore the associated Land Management Agreement (LMA) attached to the land has enhanced the environmental value through prior revegetation efforts, and accordingly it is not considered to be at significant odds with the Board's Orderly Development Policy.

Coastal Amenity

Coast Protection Board Policy 5.2 (a):

“The Board opposes development that has significant visual impact on coastlines with significant landscape value”

The Board aims to protect significant landscape values such as the unique coastal vistas that offer aesthetic qualities, shape tourism attractions, and offer recreation, social and economic opportunities for the State.

Based on the average amenity ratings (Andrew Lothian Report, 2005) for this location, there is no significant impediment on landscape value and the Board considers the proposed development compliant with Board Policy.

Native Vegetation

Whilst no formal revegetation plans are envisaged within the Conservation Zone, the landowner indicates further vegetation plantings over time to help stabilise soil structure and provide screening.

It is also noted that a Native Vegetation Clearance Report has been prepared for approval by Native Vegetation Council pursuant to the *Native Vegetation Act (1991)*.

Stormwater & Wastewater

Coast Protection Board Policy 1.4 (d) states:

“Minimise the impact of stormwater discharge to the coast and nearshore waters.”

The Board seeks to minimise the impact of stormwater and wastewater discharge and erosion within coastal areas. Council should ensure that the stormwater and wastewater management systems associated with the development are designed and maintained in such a way so as to minimise discharge and pollution to the surrounding environment.

Coast Protection Board Response

The Coast Protection Board has no objections to the proposed development and directs that the following Conditions is applied to any approval.

Conditions

- A Guest Information Pack (prepared in consultation with the Coast Protection Board) shall be provided with every booking. This shall incorporate environmental and visitor management guidelines covering the following information:
 - Visitor management regarding navigation within the conservation zone, beach access/pathways and restrictions.
 - Potential environmental impacts associated with visitation.
 - Listing of common native plants and birds.
 - Specific information regarding managing human interactions with Hooded Plovers (*Thinornis cucullatus*).
- The applicant shall provide clear signage in suitable locations to guide visitors to and from the beach, ensuring that pedestrian access has minimal impact on the coastal environment.
- Any earthworks and construction activity shall not adversely affect coastal land or the nearshore marine environment, by erosion, discharge or pollution.
- Any imported fill shall be free of weeds and pathogens.
- Any landscaping shall use local native coastal species, avoiding the spread of exotic plants on the coast. The Northern and Yorke Natural Resources Management Board should be contacted if the applicant requires expert advice including the development of a suitable species list. However, general information can be found in the Coastal Garden Planting Guide found on the following website: [NY-Coastal-Gardens-Planting-Guide.pdf](#)

- All stormwater design and construction shall not adversely affect coastal land by erosion, discharge or pollution.

Recommended Advisory Notes

- The applicant is reminded of their general environmental duty, as required by Section 25 of the *Environment Protection Act (1993)*, to take all reasonable and practical measures to ensure that the activities on the whole site, including during construction, do not cause environmental harm.
- The wastewater management system associated with the development should be designed and maintained to ensure there is no pollution within the coastal environment.

Disclaimer

The Board attaches the following disclaimer to the above advice;

Based upon current knowledge and information the development and development site is at some risk of coastal erosion and inundation due to extreme tides notwithstanding any recommendations or advice herein, or may be at future risk. Neither erosion nor the effect of sea level change on this can be predicted with certainty. Also, mean sea level may rise by more than the 0.3 metres assumed in assessing this application.

Accordingly neither the South Australian Coast Protection Board nor any of its servants, agents or officers accept any responsibility for any loss of life and property that may occur as a result of such circumstances.

If this application is approved, the Council should consider including a similar disclaimer in its Decision Notification to the applicant. However, no reference must be made to the Coast Protection Board in the Council's disclaimer.

Yours sincerely



Kym Gerner
Coast and River Planner-Coast Unit
Department for Environment and Water
Delegate for the Coast Protection Board