



25 July 2025

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COAST PROTECTION BOARD
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Development Application No	25016498
Applicant	Ika Shima Trading P/L c/o URPS
Description	Variation of Development Application 22043281 comprising changes to "Site 1" including replacing 4 villas with 22 smaller cabins.
Location	Louth Island
Development Zoning	Zones <ul style="list-style-type: none">• Coastal Waters and Offshore Islands Overlays <ul style="list-style-type: none">• Coastal Areas• Hazards (Bushfire)• Native Vegetation
Planning Authority	State Planning Commission

I refer to the above development application forwarded to the Coast Protection Board (the Board) in accordance with the requirements of the *Planning, Development and Infrastructure (General) Regulations 2017*.

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

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

Proposal

Variation of Development Application 22043281 comprising changes to "Site 1" including replacing 4 villas with 22 smaller cabins, along with additional minor facilities and works as detailed in the application.



Figure 3: Aerial view of Louth Island, looking north. Source: Application documents

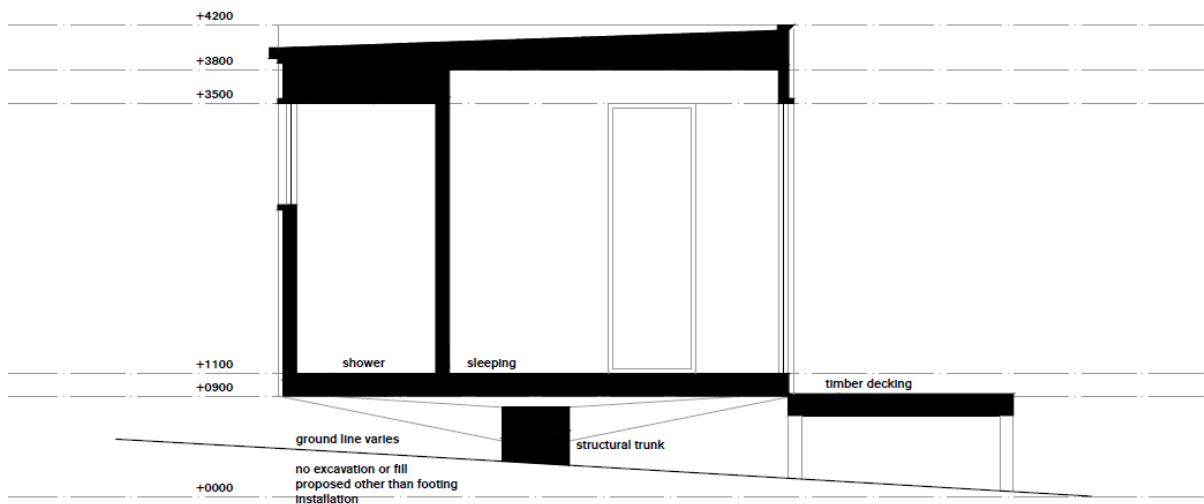


Figure 4: Simplified elevation of cabin design (typical) showing singular pole footing and nil building level earthworks.

Assessment

Coast Protection Board Policy

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

- minimise impacts of development on the coast
- protect coastal biodiversity
- minimise future protection costs by ensuring new development satisfies the Board's flooding and erosion policies
- minimise or stop development in areas subject to coastal hazards
- maintain compact coastal settlements and restrain ad-hoc coastal development
- minimise future environmental protection costs
- retain coastal open space
- protect scenic amenity
- conserve developed coastal areas for land uses that require a coastal location.

The Board's policies are generally reflected in the Planning and Design Code.

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 initial development per DA 22043281 was assessed against the above policies, whereby it was deemed to be scattered coastal development by way of its location. The above policies potentially allow for tourist accommodation development, albeit with a preference for large-scale tourism development to be sited within appropriate development nodes. The Board concluded however that the proposal was not at odds with Policy 1.5, noting that the proposal provided for a significant environmental benefit by way of its revegetation program and pest species management, nor was it is not at odds with the requirements of Policy 1.6.

The subject proposed variation does not alter the Board's position in relation to its orderly development policies.

Visual impact

Coast Protection Board Policy 1.4(e):

"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."

Coast Protection Board Policy 5.2:

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

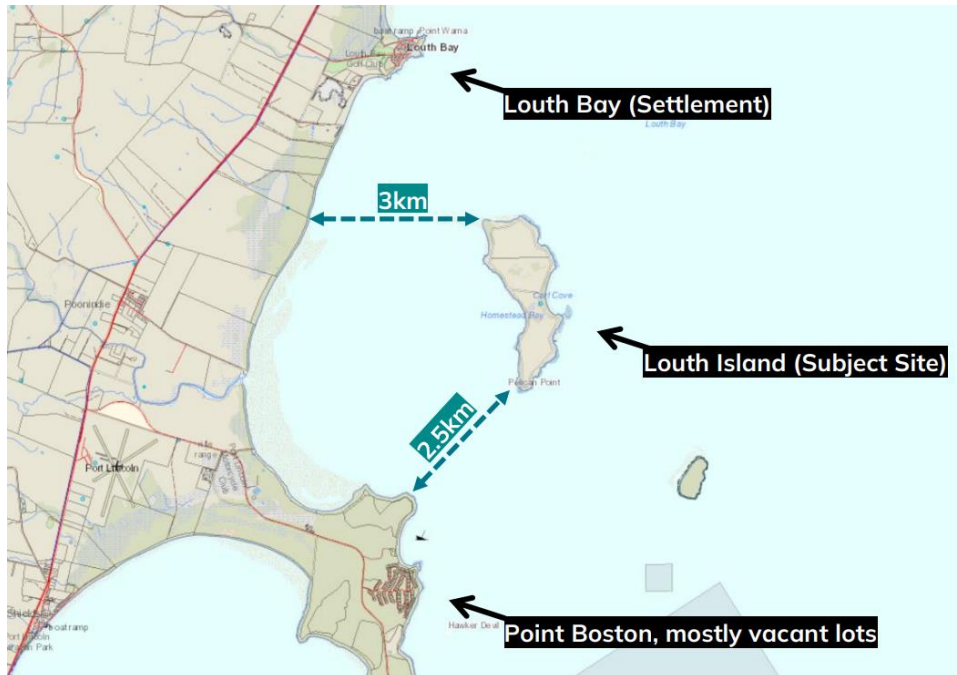


Figure 5: Location of Louth Island relative to mainland. Source: Application documents

Louth Island is some 2.5+ km from the mainland, and this distance would ensure that most forms of development on the island, unless significantly tall and projecting above the low silhouette of the island (e.g. a multi-storey building) would not be particularly impactful on overall sea vistas from the mainland.

The low form of the subject development components are noted and this, combined with distance from the mainland, indicate that the proposed development is not at odds with the Boards' visual amenity policies. Additional landscaping and revegetation will be undertaken across the island and around the proposed buildings, further minimising the impact on visual amenity including from nearby marine waters.



Figure 6: View towards Louth Island from Louth Bay settlement. (NB: It is the Board's assessment that the island is likely to be slightly more prominent to the human eye than indicated in this image)

Coastal Flooding and Erosion Hazard Risk

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.”

The proposed development will not be impacted by coastal processes.

Coastal Biodiversity

Coast Protection Board Policy 1.4(e):

“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.”

By way of the previous application the applicant has undertaken extensive consultation with ecological consultants to develop a number of ecological management plans, and officers from DEW have previously met with the applicant on site and provided advice on coastal and ecological issues with regards to the original development application. The resultant visitor and environmental management plans were approved.

The Board notes that where relevant, these plans were developed with an assumption of 66 visitors, which would be 100% occupancy of accommodation units. The subject amended application sees total bed numbers rise from 66 to 95 at 100% occupancy.

The proponent argues that overall, an average occupancy rate of 60-70% for resort accommodation, across the year, can be expected, and therefore, calculations around island management should be based on the more practical number of 66 – 78 visitors (i.e. 60 – 70% occupancy), which would represent a relatively minor change with regards to actual visitor impacts from what was approved previously.

The Board accepts this argument in part however it requires that 100% occupancy should be taken into consideration for the subject application, or at least any range between 70 – 100%, as it can be assumed that at peak times there will likely be occupation numbers within that higher range, and therefore, potentially greater impacts on sensitive environmental values unless properly managed.

Given the nature of the environmental values associated with the island, a precautionary approach should be adopted, and the Board therefore requires that all previously approved visitor and environmental management plans be reviewed by the original authors (or persons with equivalent expertise) and adapted where necessary to accommodate a higher maximum potential number of visitors.

The Board has further assessed that the overall impact on coastal landform, in terms of ground disturbance and major earthworks is less with the subject variation DA, and it notes that a Native Vegetation clearance application will be revised to show less clearance than calculated for the previous DA.

Coast Protection Board Response

The Coast Protection Board advises it has no objections to the proposed development. It directs that the following Conditions, and recommends that the following Notes, are applied to any development consent:

Conditions

- All previously approved visitor and environmental management plans shall be reviewed by the original authors (or persons with equivalent expertise) and adapted where necessary to accommodate potential visitor numbers associated with 100 percent occupancy of accommodation facilities, to the satisfaction of the Coast Protection Board.

[Note in relation to the above Condition: Particular attention should be paid to plans associated with the Wedge-tailed Eagle, Fairy Tern, Hooded Plover and other beach nesting birds, Fairy Penguin, migratory coastal birds and marine mammals.]

Notes

- The Coast Protection Board advises that any further significant expansion in tourism development upon the island may exceed the island's capacity in terms of usual environmental aims, and if so could potentially be at odds with current Board Policy.

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.

Yours sincerely



Peter Allen

Senior Coastal Planner

Coast Unit

Department for Environment and Water

Delegate for the Coast Protection Board