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Lodged via Plan SA

## Louth Island – Tourist Accommodation – Variation to “Site 1”

### Background

This application has been referred to the Coast Protection Board, which has indicated that additional information is likely to be required regarding:

- The management of increased visitor numbers.
- The impact on coastal landscape amenity due to the proposed design changes.

This letter addresses those concerns and is intended to resolve the matter without the need for a formal Request for Information (RFI).

### Visitor Management

The approved application included documentation estimating a maximum guest occupancy of 66 people. This figure comprises 10 guests accommodated in the rooms above the restaurant and an average of 2.15 guests per villa, based on 100% occupancy.

The applicant intentionally adopted high occupancy rates for planning purposes, allowing flexibility in the future implementation and operation of the project. This approach was designed to overestimate visitor numbers, providing a buffer for potential variations in actual usage.

In practice, coastal resorts in South Australia typically experience annual occupancy rates of approximately 60–70%, with higher occupancy during the summer months and lower rates in winter. Further, our client has advised that this region has an average occupancy of 60%, which has been modelled financially for the resort.

This application will result in the villas/cabins being increased from 26 to 44.

The more realistic occupancy scenario, based on the proposed scenario, is presented in the table below – where the total number of guests on the island remains very similar to the approved limitations.

| Accommodation type (total number of rooms) | Estimated number of guests based on 2 guests per bed at 60-70% occupancy |
|--|--|
| Rooms above restaurant (x5)                | 2 guests per room, with 100% occupied:<br><b>10 guests</b>               |
| Earth bermed villas (x22)                  | 2.15 guests per villa, with 60-70% occupied:<br><b>28 to 33 guests</b>   |
| Proposed small cabins (x22)                | 2.15 guests per cabin, with 60-70% occupied:<br><b>28 to 33 guests</b>   |
| <b>TOTAL</b>                               | <b>66 to 76 guests proposed (vs 66 approved)</b>                         |

Even if there were more than 66 guests on site, the increase in visitation would be relatively minor and manageable in the context of this project. In particular:

- Access around the site will continue to be well controlled and limited to the defined access paths. There is no greater impact on the land accordingly.
- “Site 1” is more than 1km from the wedge tailed eagle nest, and well outside the buffer areas approved around that nest.
- Boat movements will not increase – again, boat movements were overestimated to provide the applicant with operational flexibility.

### Coastal Landscape Amenity

The planning statement lodged with the variation application included the following comments in support of the cabin design:

- All materials and finishes will be low-reflective and blend with the natural colours of the landscape. The applicant is willing to accept a condition to this effect.
- No part of the proposal will be situated on a ridgeline, and in fact the earth naturally rises behind each cabin.
- Existing vegetation will be retained wherever possible. As above, the variation will have a reduced impact upon native vegetation as confirmed by Succession Ecology. Please refer to their attached letter dated 22 May 2025.
- In addition, the new design will require less alteration to the natural landform given the cabins will not feature earth berms.

In addition to the points above, the proposed cabins adopt the same colours and materials as the building shown in the photograph below – this illustrates how the

existing (and proposed) built form blends very successfully into the natural colours of the landscape. Together with the small scale of the structures (20m<sup>2</sup> each), and the rising landform behind the cabins, we suggest that the visual impact of the proposed variation will be negligible when compared to the approved development.



The Coastal Areas Overlay sets out the purpose of the CPB referral, which is to provide expert assessment and direction on:

***The risk to development from current and future coastal hazards (including sea-level rise, coastal flooding, erosion, dune drift and acid sulfate soils);***

***Coast protection works;***

***Potential impacts from development on public access and the coastal environment (including important coastal features).***

In respect to the considerations above, the proposed variation:

- Does not heighten or alter the coastal hazards risk profile associated with the development (in relation to sea-level rise, coastal flooding, erosion, dune drift and acid sulfate soils).
- Does not require, or result in, coast protection works.

- Does not impair or impact on public access, as the work is contained within an approved resort site.
- Has low and reasonable impact on the coastal environment and important coastal features given it avoids sand dunes, is setback from clifftops and has an acceptable impact on native vegetation (as endorsed by the NVC). Visual impacts on the general public and surrounding land are particularly limited given the offshore location of the development.

## Conclusion

This submission addresses the CPB's queries regarding visitor management and coastal landscape amenity. The projected guest numbers remain within approved limits, under realistic occupancy scenarios, and any increase in visitation would be minor and manageable. Site access, ecological buffers, and boat movements will remain controlled and unchanged.

The proposed cabin design has been carefully considered to minimise visual and environmental impact, using low-reflective materials, retaining vegetation, and avoiding ridgelines. With a modest footprint and natural screening, the variation is expected to have negligible impact compared to the approved development.

We trust this information resolves the queries without the need for an RFI.

Yours sincerely



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