

## **Appendix A**

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List of respondents

## List of respondents

The following is a list of Government, Local Government, Member of Parliament and public respondents who commented on the Southern Ocean Lodge PER document.

Submission No.	Name on Submission	Suburb	Comment
<b>Government Submissions</b>			
G1	Environment and Conservation Portfolio: <ul style="list-style-type: none"> <li>▪ Department for Environment and Heritage</li> <li>▪ Department of Water, Land and Biodiversity Conservation</li> <li>▪ Environment Protection Authority</li> <li>▪ ZeroWaste SA</li> </ul> Peter Torr, Environment and Conservation Major Projects Coordinator	Adelaide	Agency Submission
G2	Department of Health – Public Health – Dr Kevin Buckett, Director	Adelaide	Agency Submission
G3	Department for Transport, Energy and Infrastructure (DTEI) – Infrastructure Division – Robert Jenkins, Project Director	Walkerville	Agency Submission
G4	Department for Aboriginal Affairs and Reconciliation – Aboriginal Heritage Branch – Beverly Nicks, Senior Project Manager	Adelaide	Agency Submission
G5	South Australian Tourism Commission, WT (Bill) Spurr, Chief Executive	Adelaide	Agency Submission
G6	SA Country Fire Service – Development Assessment Unit (Bushfire Protection) – Brian Menadue, Senior Development Assessment Officer	Mt Barker	Agency Submission
G7	Department for Families and Communities – Social Inclusion, Strategy & Research – Alan O’Connor, Senior Policy Officer	Adelaide	Agency Submission
G8	Department of Trade and Economic Development – Economic Analysis and Policy – Mick O’Neill, Director	Adelaide	Agency Submission
G9	Native Vegetation Council – John Roger, Presiding Member	Adelaide	Agency Submission
G10	Planning SA Assessment	Adelaide	Agency Submission
*G11	<i>Department for Transport, Energy and Infrastructure (DTEI) – Traffic and Access Standards – Manager</i>	<i>Walkerville</i>	<i>Agency Submission</i>
<b>Local Government Submissions</b>			
LG1	Kangaroo Island Council – Nick Brown, CEO	Kingscote	Council Submission
*LG2	<i>Kangaroo Island Council – Kangaroo Island District Bushfire Prevention Committee – Peter Davis, Chairperson</i>	<i>Kingscote</i>	<i>Council Submission</i>
<b>Member of Parliament Submissions</b>			
MP1	Finniss Electorate Office - Michael Pengilly MP, Member for Finniss, Shadow Parliamentary Secretary for DTEI and Regional Development	Victor Harbor	Individual Submission

Submission No.	Name on Submission	Suburb	Comment
<b>Public Submissions</b>			
P1	J Grinter	Greenbushes (WA)	Proforma Submission A
P2	Pontifex Farming Trust	Kadina	Proforma Submission A
P3	W Ravenscroft	Sandhill	Proforma Submission A
P4	R Jackson	American River, KI	Proforma Submission A
P5	J Barnett	Launceston (TAS)	Proforma Submission A
P6	R Barnett	Launceston (TAS)	Proforma Submission A
P7	P Jackson	Malvern	Proforma Submission A
P8	D & M Tiller	Mallala	Proforma Submission A
P9	J Simpson	Kingscote	Proforma Submission A
P10	P Hupfeld	Kingscote	Proforma Submission A
P11	A Morrison	Kingscote	Proforma Submission A
P12	J & W Wallace		Proforma Submission A
P13	S Carey	Kingscote	Proforma Submission A
P14	E Sheppard	Kingscote	Proforma Submission A
P15	S Murton		Proforma Submission A
P16	A Blakney	Taroona (TAS)	Proforma Submission A
P17	H Kench	Taroona (TAS)	Proforma Submission A
P18	D West	Kingscote	Proforma Submission A
P19	J Carey	Penneshaw	Proforma Submission A
P20	M Wolpert		Proforma Submission A
P21	J Mackintosh	Dudley Peninsula, KI	Proforma Submission A
P22	R Seamark	Aldinga Beach	Proforma Submission A
P23	J Bloemendal	Kingscote	Proforma Submission A
P24	JP Bloemendal	Kingscote	Proforma Submission A
P25	C West	Kingscote	Proforma Submission A
P26	M Elliott & T Barnes	KI	Proforma Submission A
P27	N Pike	Penneshaw	Proforma Submission A
P28	R & J Wilson	Kingscote	Proforma Submission A
P29	S Clarke	Karatta, KI	Proforma Submission A
P30	V Clarke	Karatta, KI	Proforma Submission A
P31	D & M Wilson	Kingscote	Proforma Submission A
P32	K Grinter	American River, KI	Proforma Submission A
P33	N Grootemboer	Kingscote	Proforma Submission A
P34	R Swan	American River, KI	Proforma Submission A
P35	E Giles	Kingscote	Proforma Submission A
P36	S McGowan		Proforma Submission A
P37	L Carter		Proforma Submission A
P38	B Overton		Proforma Submission A
P39	Illegible		Proforma Submission A
P40	D Clothier		Proforma Submission A
P41	J Giles	Kingscote	Proforma Submission A

Submission No.	Name on Submission	Suburb	Comment
P42	M Leane		Proforma Submission A
P43	D & S Pattingale		Proforma Submission A
P44	C Whale	Kingscote	Proforma Submission A
P45	Illegible	Kingscote	Proforma Submission A
P46	Kavan		Proforma Submission A
P47	S Holmes	Kingscote	Proforma Submission A
P48	L Montanjees		Proforma Submission A
P49	P Goodwin	Penneshaw	Proforma Submission A
P50	L & P Dennis	Kingscote	Proforma Submission A
P51	R & A Clark		Proforma Submission A
P52	R Hansberry	Kingscote	Proforma Submission A
P53	A Locks	American River, KI	Proforma Submission A
P54	S & S Lovering	KI	Proforma Submission A
P55	K Cuddihy	Kingscote	Proforma Submission A
P56	P & R Handley	Kingscote	Proforma Submission A
P57	H Lane	American River, KI	Proforma Submission A
P58	S Thompson		Proforma Submission A
P59	T Linnet & J Drinkwater		Proforma Submission A
P60	T Trice	American River, KI	Proforma Submission A
P61	M Perkins		Proforma Submission A
P62	D Stubbs-Mills	Penneshaw	Proforma Submission A
P63	I Gilfillan		Proforma Submission A
P64	K & R Florance		Proforma Submission A
P65	Illegible		Proforma Submission A
P66	J Ayliffe		Proforma Submission A
P67	J Clapson	Kingscote	Proforma Submission A
P68	M Heard		Proforma Submission A
P69	Illegible		Proforma Submission A
P70	Illegible		Proforma Submission A
P71	Illegible		Proforma Submission A
P72	Illegible		Proforma Submission A
P73	Illegible		Proforma Submission A
P74	G Rowsell		Proforma Submission A
P75	S Neave		Proforma Submission A
P76	W & J Buick		Proforma Submission A
P77	A Stephenson		Proforma Submission A
P78	T & F Gilbert		Proforma Submission A
P79	V Bates	Kingscote	Proforma Submission A
P80	L Dunn	Kingscote	Proforma Submission A
P81	R & P Murten		Proforma Submission A
P82	J Higgs		Proforma Submission A
P83	B & J Cleland	Penneshaw	Proforma Submission A

Submission No.	Name on Submission	Suburb	Comment
P84	A & J West	Kingscote	Proforma Submission A
P85	M & E Hurst	Kingscote	Proforma Submission A
P86	L Willson	KI	Proforma Submission A
P87	P Rinnane	Kingscote	Proforma Submission A
P88	K Wiadrowski	KI	Proforma Submission A
P89	Illegible	Kingscote	Proforma Submission A
P90	C Colenso	Kingscote	Proforma Submission A
P91	J Benney		Proforma Submission A
P92	Illegible		Proforma Submission A
P93	Illegible		Proforma Submission A
P94	K Hemmat		Proforma Submission A
P95	D Stanton	Stokes Bay, KI	Proforma Submission A
P96	Illegible		Proforma Submission A
P97	J Wallace	Stokes Bay, KI	Proforma Submission A
P98	N Stephenson	Kingscote	Proforma Submission A
P99	Illegible		Proforma Submission A
P100	M Amor	Brownlow, KI	Proforma Submission A
P101	B Birks	Kingscote	Proforma Submission A
P102	R & B Spark	Penneshaw	Proforma Submission A
P103	D & J Havelberg	Cygnets River, KI	Proforma Submission A
P104	R & B Hilder	Penneshaw	Proforma Submission A
P105	D Smith	Kingscote	Proforma Submission A
P106	D Langdon	KI	Proforma Submission A
P107	D Correll		Proforma Submission A
P108	C Henrich	Baudin Beach, KI	Proforma Submission A
P109	S Gillespie	Kingscote	Proforma Submission A
P110	M Morrison	Hove	Proforma Submission A
P111	D Arnold	Penneshaw	Proforma Submission A
P112	M & M Tremaine		Proforma Submission A
P113	M Lucas		Proforma Submission A
P114	E Barrios	Penneshaw	Proforma Submission A
P115	Illegible		Proforma Submission A
P116	J Woolley	KI	Proforma Submission A
P117	Baxter		Proforma Submission A
P118	G & J Budarek	Kingscote	Proforma Submission A
P119	The Conservation Council of South Australia Inc (CCSA)	Adelaide	Individual Submission
P120	M & G Dreimanis	Magill	Individual Submission
P121	T Bartram	American River, KI	Individual Submission
P122	I & P Heath	Kingscote	Proforma Submission A + Individual Comments
P123	C & B Maxwell	Kingscote	Individual Submission
P124	P Masters and R Southgate		Individual Submission

<b>Submission No.</b>	<b>Name on Submission</b>	<b>Suburb</b>	<b>Comment</b>
P125	W Haylock	Kingscote	Individual Submission
P126	K Buttery	KI	Individual Submission
P127	S Antill	Turrumurra, NSW	Individual Submission
P128	B & J Huxtable	Penneshaw	Proforma Submission A
P129	M Fowler		Proforma Submission A + Individual Comments
P130	B & T Parsons	Kingscote	Individual Submission
P131	J Antill	Turrumurra, NSW	Individual Submission
P132	H Richards	Kingscote	Proforma Submission C
P133	R Mussared		Proforma Submission A + Proforma Submission C
P134	A Schofield	Kingscote	Proforma Submission A + Proforma Submission C
P135	V & R Borgmeyer		Proforma Submission A
P136	D Dowie	Kingscote	Proforma Submission C
P137	B & D Overton	Kingscote	Individual Submission
P138	E Shearman	Penneshaw	Individual Submission
P139	S & C McGowen	Kingscote	Individual Submission
P140	B Golder	Kingscote	Individual Submission
P141	G Wilby	Kingscote	Individual Submission
P142	P Jackson	Malvern	Individual Submission
P143	Dr T Wootten-Leeuwenburg	Kingscote	Proforma Submission B
P144	J Marshall	Kingscote	Proforma Submission B
P145	C Stephenson	Nairne	Proforma Submission B
P146	S Hourez	Kingscote	Individual Submission
P147	E Shearman	Penneshaw	Individual Submission
P148	M Latz		Individual Submission
P149	C & R Beckwith	Western KI	Individual Submission
P150	R Cohen	Kingscote	Proforma Submission A + Individual Comments
P151	C Cohen	Kingscote	Proforma Submission A + Individual Comments
P152	C Baxter – South Coast Action Group	KI	Proforma Submission C + Individual comments
P153	F & H Vickery	Kingscote	Proforma Submission C + Individual comments
P154	S Wright	American River, KI	Individual Submission
P155	M Florance	KI	Proforma Submission A
P156	M Willson	West Lakes	Proforma Submission A + Individual Comments
P157	M Warren	Penneshaw	Individual Submission
P158	D Clarke	Penneshaw	Individual Submission
P159	J Wheaton	Kingscote	Individual Submission
P160	P moon	Kingscote	Individual Submission
P161	P Leeuwenburg	Kingscote	Proforma Submission B

Submission No.	Name on Submission	Suburb	Comment
P162	M Leeuwenburg	Glengowrie	Proforma Submission B
P163	T Moorey	Kingscote	Proforma Submission A + Individual Comments
P164	N Findlay	Bedford Park	Individual Submission
P165	D & M Patterson	Kingscote	Proforma Submission B
P166	E Neave	KI	Proforma Submission A + Individual Comments
P167	K Stove	Penneshaw	Individual Submission
P168	S Grovermann	Sefton Park	Proforma Submission B
P169	K Eilers	Clarence Park	Proforma Submission A
P170	T & M Dennis	Encounter Bay	Proforma Submission A + Individual Comments
P171	P Park		Proforma Submission A + Individual Comments
P172	B Stokes	Kingscote	Individual Submission
P173	C Williams	Kingscote	Individual Submission
P174	D Welford	Kingscote	Individual Submission
P175	M Thorpe	Broadview	Proforma Submission B
P176	P Doumouras	Hope Valley	Proforma Submission B
P177	D McDonald	Penneshaw	Individual Submission
P178	M Newton	Kingscote	Individual Submission
P179	R & A Beckwith	Kingscote	Individual Submission
P180	T Deed		Individual Submission
P181	F Hall		Proforma Submission B
P182	G & M Dreimanis	Magill	Individual Submission
P183	J Bloemendal	Kingscote	Individual Submission
P184	Natural History Society of South Australia – Graham Churchett, Fellow	Athelstone	Individual Submission
P185	T Wootton	Gosse, KI	Individual Submission
P186	L Harris	Bay of Shoals, KI	Individual Submission
P187	T & M Geyer	Kingscote	Individual Submission
P188	M Elliott & T Baines		Proforma Submission A
<b>Late Submissions (received after May 17 2006)</b>			
L1	P Harvey	Kingscote	Individual Submission
L2	W Gripton	Brownlow, KI	Individual Submission
L3	W Richards	Kingscote	Proforma Submission C
L4	M Mooney	Alice Springs (NT)	Proforma Submission A
L5	R Colman	KI	Proforma Submission A
L6	R Dare	Port Augusta	Proforma Submission A + Individual Comments
L7	A McClaren	KI	Proforma Submission A
L8	G & D Morris	KI	Proforma Submission A
L9	C Duncan	Kingscote	Proforma Submission A
L10	P Boehm	Kingscote	Proforma Submission A

<b>Submission No.</b>	<b>Name on Submission</b>	<b>Suburb</b>	<b>Comment</b>
L11	A Boss		Proforma Submission A
L12	R Wandel	Kingscote	Proforma Submission A
L13	K Brinkley	Emu Bay, KI	Proforma Submission A
L14	P Richards & R Tanti	Penneshaw	Proforma Submission A
L15	C Brinkley	Emu Bay, KI	Proforma Submission A
L16	C Smith	Kingscote	Proforma Submission A
L17	H Barrett	Kingscote	Proforma Submission A
L18	A Waldeck	Kingscote	Proforma Submission A
L19	Illegible		Proforma Submission A
L20	D George		Proforma Submission A
L21	N Jenkins	Kingscote	Proforma Submission A

\* Submissions in italics were also received after the due date of May 17 2006.

## **Appendix B**

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Summary of Government  
submissions

## Summary of Government submissions

The following is a summary of the Government, Local Government and Member of Parliament submissions on the Southern Ocean Lodge PER document.

Codes: PER = Public Environment Report, NSG = Not in Scope of Guidelines

Type	Comment	Summary	Reference in PER	Reference in Response Document
<b>G1 Environment and Conservation Portfolio</b>				
DEPARTMENT FOR ENVIRONMENT AND HERITAGE				
a		The PER does not include an assessment of the impacts of the road construction. To meet requirements for construction, delivery, refueling and emergency significant upgrading of the existing track will be required and the full impacts including vegetation clearance, management of <i>Phytophthora</i> and erosion should be included in the PER.	22	3.6.2, 3.2.1, 3.2.3
b		The site description suggests the Proponent also owns the adjoining cliffs and beach which are located on Crown land. Pedestrian access over Crown land and management of its impacts must be agreed with the Department for Environment and Heritage prior to development approval. The beach should remain unrestricted for public access.	4.9, 6.4.2	3.7
c		It is noted that the encumbrances on future development of two neighboring properties applies only to those parts of the properties with existing development restrictions for reason of being within the Coastal Landscape Zone.	3.3	3.7
d		Site selection provides limited information on evaluating alternative options for achieving the same objectives at less environmental cost, and in particular consideration of alternative locations that have less direct land use conflicts on all boundaries.	3.1	3.1
e		The instability of the natural scald of this part of the site is part of a natural cycle. The inherent instability of the natural scald presents significant risks that the scale, nature and location of the disturbance by the development will disrupt the ecological function of the sensitive dune system.	6.3.2	3.2.3
f		Assessment of native vegetation clearance does not include the development of the access road. Given the condition of the track at the time of lodgement of the application, the respondent questions the statement that “only minor pruning of vegetation along this track will be required”.	6.3.2	3.2.1
g		The PER discusses the vegetation clearance by the development as a percentage of the total property but inadequately assesses the significance of the development in terms of its impact on the ecological connection it provides between Flinders Chase National Park and Kelly Hill Conservation Park and the importance of this area within the Cape Borda to Barossa NatureLinks corridor. The development will contribute to incremental fragmentation and degradation of the remaining native vegetation in this important area. Maintaining and improving the ecological integrity of the area will become increasingly critical in the face of the pressures likely to be imposed on natural island systems in the face of climate change.	6.3.2	3.3
h		The comparative clearance requirements of two significantly different forms of development is not understood.	6.3.2	

Type	Comment	Summary	Reference in PER	Reference in Response Document
i		The pruning of native vegetation to 300 mm within 20 metres of buildings cannot be considered minor pruning as indicated. Ongoing reduction to this height will remove the canopy and mid-storey vegetation layers and is considered clearance under the Native Vegetation Act. Maintaining vegetation at this height is likely to result in the local loss of native species and will change the structure and ecological function of this area, including increased opportunities for weed invasion.	6.3.2	3.2.2
j		The conclusion that species of conservation significance can be overlooked on the basis that they are adequately represented on adjacent lands shows a lack of understanding of the relevance of habitat areas for species abundance and survival. All populations of species of environmental significance should be protected.	6.3.2	3.3
k		How were vegetation clearance figures calculated and not clear if it includes helipad clearance, access tracks and walking tracks.	6.3.2	3.2.1
l		The conclusion that Ironstone Mulla Mulla have not been observed during the field surveys and are therefore unlikely to be present fails to recognize that the species requires disturbance, such as fire, to promote regeneration. It is likely that the species could occur when the requisite disturbance regime is present.	6.3.2	3.2.5
m		The PER indicates that the proposal is unlikely to have an impact on the three species listed as vulnerable under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> being the Twining Hand-flower, Kangaroo Island Spider Orchid and Ironstone Mulla Mulla. The PER should consider the likelihood of these species occurring under specific conditions and the impact of the development on the probability that regeneration events will occur.	6.3.2	3.2.5
n		A buffer zone of 250m from the Osprey nest (located over 1 kilometre from the development) is not considered to be a conservative distance. Research on the Island raises concerns about Ospreys on the North Coast where nesting has declined in response to increased development. A precautionary response to the management of coastal raptors requires larger buffers around nest sites and in this instance any human activity between the nest site and the development should be discouraged, preferably by strict measures such as physical barriers.	6.4	3.2.6
o		The conclusion that there is a low likelihood of White-Bellied Sea-Eagles and Peregrine Falcons occurring on the site as no nesting sites have been observed is not supported. The species are regularly observed feeding in the immediate cliff area.	6.4	3.2.6
p		<p>In the report Hooded Plovers (<i>Thinornis rubricollis</i>) are said to be stable or slightly increasing in number on Kangaroo Island. In contrast, a recent publication (Dennis &amp; Masters 2006) indicates that over the past 20 years the population has been declining and this is supported by DEH annual survey data for this species. Increased activity in the area is likely to have negative impacts on this species.</p> <p>There is a known nesting site on the beach to the east of the proposed development, with guest suites within 100 m of this site. Although the PER seeks to manage access to the beach it will be easy for * people to access this part of the beach. That likelihood combined with the near vicinity of the guest suites, could result in the Hooded Plover pair abandoning this nesting site altogether. The PER should propose appropriate measures to prevent this from occurring.</p>	6.4.2.2	3.2.6

Type	Comment	Summary	Reference in PER	Reference in Response Document
r		The Kangaroo Island Dunnart ( <i>Sminthopsis aitkeni</i> ) and the Southern Brown Bandicoot ( <i>Isodon obesulus obesulus</i> ) are listed as endangered under the Environment Protection and Biodiversity Conservation Act 1999. The PER indicates that these species were not observed on the site and that there is unlikely to be a significant impact as a result of the proposal. The environmental management plan should include ongoing monitoring and reporting of any sightings of fauna on the site and identify actions put in place to manage impacts from activities associated with the development.	23.4	3.2.7
s		The existing disturbance on the site in the form of small scalds is part of the natural cycle of coastal erosion in this dune/limestone landscape. The poorly aggregated sand and limestone substrate on this site is highly prone to erosion. Even minor introduced disturbance is likely to lead to elevated erosion that may result in widespread vegetation loss in this fragile coastal ecosystem. The likely erosion impact to be introduced by the development and its ongoing operation is not addressed in any detail by the PER. As people movement could have a significant impact over time, the detail of the number, location, and type of access paths to the coast would have assisted in assessing the potential impact. Protecting the particularly sensitive (due to their exposure) dune ridges between the cliff top and the development site requires careful consideration	9.4, 4.9, 23.5	3.2.3
t		A map detailing the prevailing landforms in relation to the development site is required before an assessment of impact can be made.	9.2	4.1
u		It is not clear whether or not the location of the boundary of the existing coastal reserve would allow for appropriate public access along the cliff top	4.9	3.7
v		Water erosion is also a concern post construction when approx. 4000 sq metres of roof area will result in a serious erosion risk during high rainfall periods once water storages are at capacity.	10.1, 10.3, 21.6, 21.2	4.1
w		No reference has been made to strategies and management actions that will be put in place to manage impacts following fire events on the site. Temporary loss of vegetation cover following fires combined with the presence of structures, staff and guest activity, have the potential to result in significant soil erosion of the site's coastal sandy soils.		3.4
x		The PER does not appear to take cognisance of seasonal variations in weather conditions and its relevance for timing of construction activities	5	
y		The PER has not responded to guideline 5.2.23 in relation to evaluating the need for fire management to maintain biodiversity. The Fire Management Plan should consider fire as part of the long-term ecological management of the site if the development is to be ecologically sustainable.		3.4.1
z		The discussions of consistency with the ESD principles of inter-generational equity and the precautionary principle in the PER do not address issues of on-going compliance with the impact mitigation measures proposed, including in the event of a change of ownership. The probability of non-compliance with aspects of the Environmental Management Plan should be an important consideration in the assessment of the proposal based on the risks it presents.	15.1	4.3

Type	Comment	Summary	Reference in PER	Reference in Response Document
aa		The hydro-geological discussion on p. 80 of the PER refers to seasonal perched water tables that occur in duplex sand over clay soils, which do not actually occur on the development site. The Pleistocene calcarenite and Holocene dune sands at the Southern Ocean Lodge site are both permeable, porous materials. The limestone aquifer holds water in interstitial pore spaces rather than fractures as suggested	9.3	4.1
ab		The disused bore referred to in the third paragraph is presumably the deep bore at Kangaroo Island Wilderness Resort. No evidence is provided in the PER as to the available supply of water and flow rate from this bore. This remains uncertain, as does the fire fighting reserve volume that it is proposed that this bore will supply (Appendix E).	9.3	4.1
ac		Andrew Lothian's recent report, Coastal Viewscapes of South Australia, has mapped the scenic values of South Australia's coast. DEH concluded from that report that the site of the proposed development is of high scenic value and the proposed development will be detrimental to that value.	12.1, 12.2	4.2
ad		In regards to visibility of the site from land, further to the viewpoints identified in the PER (Section 12), DEH has observed that the site is visible from the walking trail between Hanson Bay and Kelly Hill caves at a point approximately 2 kilometres from the coast.		4.2
ae		While the EMP includes proposals on data collection through a checklist and form, it is not explained how, to whom and for what purpose this data is to be reported, or how it will be used to ensure compliance with the objectives of the EMP.	20.4.2, 22.2, 24	4.3
af		The proposed wastewater reuse project application (pi01: 15.2) should include testing of wastewater before discharge, or at least regular testing of discharged water.		Noted
ag		The Biodiversity Conservation project application (P102:15.2) should also include that "there will be no loss of threatened faunal species"	6.4.2.2	Noted
ah		The Weed Management project application (P102:15.2) should include the control of existing infestations, not just stopping their spread.		Noted
ai		Guideline 5.2.47 requires the PER to describe the implications of climate change with respect to the proposal and any proposed adaptation and reduction measures in relation to greenhouse gas emissions. The PER addresses some positive building design aspects and solar energy, but does not mention any adaptation issues such as increased storm events or link climate change to any risks/hazards that may need additional management, such as impacts from more extreme weather events on the development site itself or on associated natural areas.	9.4	4.5
aj		The PER has not responded to Guideline 5.3.6, which requires description of strategies to return the site to its predevelopment state should the project not succeed.		4.7
ak		The frequency of fires in the vicinity of the site (p.107) and consequently, the risk to the development, is underestimated due to the omission of fires that occurred in 1954, 1958, and 1970. All of these were large fires that burnt either the proposed development site or within 5 km of it.		Noted

Type	Comment	Summary	Reference in PER	Reference in Response Document
	al	<p>The overall fuel hazard for the vegetation that occurs on the site of the development has been assessed as extreme in the northern section, very high through the centre section and high in the section immediately adjacent to the coast (KI Natural Resource Management Board and DEH fuel assessment data). The proposed development will be exposed to a significant impact from bushfires unless the risks are managed. The risk of fire ignition on the site has also not been considered.</p> <p>The highest risk to the buildings will be from a bushfire coming from north-easterly to westerly directions. Winds from these directions during the bushfire season are commonly associated with high temperatures, low humidity and high wind speeds. This exposes the proposed development to a significant bushfire risk, as the north-eastern, northern and western sides of the buildings are adjacent to very high fuel hazard. The relatively lower fuel hazard to the south of the buildings will not reduce this high level of risk.</p> <p>The design of the buildings exposes the maximum area of the buildings to the maximum bushfire risk due to their east-west orientation and the consequent exposure of the northern and western aspects to very high fuel hazard and the most extreme fire weather conditions. The ridge to the west of the buildings is unlikely to significantly reduce fire intensity or forward rate of spread in high, very high or extreme fire danger weather conditions.</p>	17.6, 17.4	3.4
	am	A comprehensive Fire Management Plan should be prepared to identify fire-associated risks, assess the level of risk, and develop the management strategies and actions necessary to mitigate and manage these risks.	21.9, 17.6, 22.10, 17.7	3.4
	an	The PER fails to mention in the section on natural heritage places (p.78) that the Southern Ocean Lodge site falls within the 'Tandanya Natural Area7 and is, therefore, on the Register of the National Estate (Place ID 19021). The PER has not addressed the issue of potential loss of heritage value as a result of this development.		4.6
	ao	The style of this development significantly impacts on the social aspect of wilderness, which includes aspects such as self-reliance, lack of perceived developments, remoteness, and high landscape and aesthetic values that result from absence of infrastructure. The development will contribute to the fragmentation of an almost intact coastal zone of approximately 40km stretching from Cape du Couedic to Vivonne Bay. The only existing development along this stretch of coast is at the Hanson Bay Cottages, and if it was possible to locate the proposed development in the same location it would present an opportunity for meeting the objectives of the proposal at a significantly reduced environmental cost.	6.3.2.6	3.3, 3.1
	ap	The PER does not consider the importance of the site in relation to the target in the South Australia's Strategic Plan of five well-established biodiversity corridors linking public and private lands across the State by 2010 to promote a landscape scale approach to conservation. In addition to the significant contribution the coastal habitat around Hanson Bay makes as an ecological linkage between Flinders Chase National Park and Kelly Hill Caves Conservation Park, the Kangaroo Island's south coast provides an almost intact ecological corridor between Cape Borda and the Dudley Peninsula, which will contribute significantly to the successful implementation of the Cape Borda to Barossa NatureLinks corridor, one the five corridors identified to achieve the Strategic Plan target.		3.3
	aq	An assessment against the Development Plan should not result in a development being 'approved on merit/ just because it is not at serious variance with the provisions of the development Plan. An assessment against relevant provisions is still required.	7.3	3.8

Type	Comment	Summary	Reference in PER	Reference in Response Document
ar		DEH notes that the proposed development is at odds with the various Coastal Landscape Zone provisions relating to scenic values. Specifically Objective 1 and 2, and Principles 1, 3, 5, 9, 10, 12, 13 and 15. The proposal is also at odds with Principles 6 and 8.	7.3, Appendix J	3.8
as		It is also likely that the staff accommodation component falls within the list of non-complying development (as a Multiple Dwelling or Residential Flat Building) in Principle 16.		3.8
at		The PER does not state whether the coastal reserve is to be increased to meet the requirements of Principle 227 (ie 50 metres from the cliff top). DEH notes that land division falls within the major development declaration.	Appendix J	3.7, 3.8
au		The PER also makes various references to the development being setback 100 metres from mean high water mark. That is of particular relevance to Principle 211 (relating to the required setback for effluent disposal systems). However, the 'mean high water line' shown on Plan 392-M-10 and the mean high water mark plotted on the Section on Plan 392-M-7 appear to be more seaward than DEH would expect. An accurate determination of that mark along with the location of the coastal reserve boundary is required.		3.7, 3.8
<b>DEPARTMENT OF WATER, LAND AND BIODIVERSITY CONSERVATION</b>				
a		The Animal and Plant Control Group indicated that there was no evidence that there were any animal and plant control issues associated with the development.		Noted
b		They would however suggest that the developers need to consult with the NRM Board over arrangements to minimise the risk of spreading weeds during works. The development may cause other environmental impacts that need to be considered by other groups.	6.5.3, 21.12, 22.13	Noted
<b>ENVIRONMENT PROTECTION AUTHORITY</b>				
a		Marine issues, in particular pollution to marine waters are considered to be minimal provided the facility is constructed and operated in accordance with the details provided.		Noted
b		The major threat to marine waters and ecosystems is contaminated runoff or wastewater flowing down to the beach and sea, particularly during the construction phase.	22.7, 10.3, 23.9, 10.2.2.1	4.1
c		The level of wastewater generated and consequent irrigation rates should be closely monitored and if greater than 8,500L/day then irrigation area and rates modified to suit.		Noted
d		Wastes during construction and operation are to be adequately contained to ensure they don't escape the site. Waste disposal points (vermin proof) should also be provided on pathways towards the beach so that people using the lodge have somewhere to put rubbish when doing their beach trips.	22.5, 23.7	Noted
e		Page 83 states that the treatment of rainwater supplies in the storage tanks may be done using chemical disinfection - The applicant should discuss in the response document of any impacts on the local environment from the overflow of rainwater tanks in the event of significant rainfall event.		4.1
f		In order to control erosion from the site during the construction phase, it is recommended that clearing of vegetation is minimised and subsequent revegetation of impacted areas undertaken as soon as possible following construction	21.6	3.2.1, 3.2.3

Type	Comment	Summary	Reference in PER	Reference in Response Document
		ZEROWASTE SA		
	a	Zero Waste SA has no comment on the PER.		Noted
<b>G2 Department of Health</b>				
	a	The public and environmental health aspects (eg, water management, emergency response and hazard management) have been reviewed and generally appear to have been appropriately addressed.		Noted
	b	The intention to ensure that the potable water supply (rainwater) meets NH&MRC Australian Drinking Water Guidelines is acknowledged and welcomed.	10.1	
	c	It is unclear from the PER whether the fire fighting water supply will be treated or untreated bore water only or a mixture of bore water and rain water as required and the quantity of water required for fire fighting. It is recommended that these issues be clarified and that it be confirmed that the rainwater treatment plant will be able to treat bore water to potable standards should it be stored in the rainwater tank. If this is not the case, alternate arrangements will be required.	10.1	4.1
	d	The proponent's consultant has liaised with the Wastewater Management Unit in the Environmental Health Service on this issue and there are no impediments at this conceptual stage.		Noted
	e	Although the proposal to dispose of the wastewater effluent by subsurface irrigation is satisfactory, should surface irrigation be desired, then the effluent must be disinfected to meet the requirements of the South Australian Reclaimed Water Guidelines (1999).	10.2.2	Noted
	f	The Department reminds the Proponent that a disposal path for the spa water must be designed to comply with the requirements of the relevant authority under the Public and Environmental Health Act 1987 and the Proponent must obtain a separate approval from the Department of Health (Wastewater Management Unit) for the other elements of the onsite collection, treatment and disposal of wastewater.	10.2.2	Noted
<b>G3 Department of Transport, Energy and Infrastructure – Infrastructure Division</b>				
	a	SOL provides creative solutions to developments in remote locations.		Noted
	b	The creative design to achieve passive solar climate control and active water recycling both help to achieve a sustainable development.		Noted
	c	The use of diesel generators to provide power is the only viable solution to power at the western end of KI. Wind could have provided a renewable energy source but research has shown that it cannot provide reliable supplies at all times; a requirement for a development of this type. The availability of Bio diesel in SA once the planned refineries are completed will provide the opportunity to use a renewable fuel in the future.	4.6.3	3.6
	d	The Hanson Bay access road is not seen as a major issue as a high proportion of the target clients are expected to be collected from the airport in SOL vehicles. Experienced drivers will ensure safer passage over the unsealed roads minimising the risks of increased road trauma from increasing the number of inexperienced drivers on the KI roads.	4.7, 4.8	

Type	Comment	Summary	Reference in PER	Reference in Response Document
	e	Infrastructure Division thus supports the development of the Southern Ocean Lodge and can see no infrastructure impediment to it proceeding.		Noted
<b>G4 Department for Aboriginal Affairs and Reconciliation</b>				
	a	Confirm the advice that the Central Archive, which includes the Register of Aboriginal Sites and Objects (the Register), administered by the Department for Aboriginal Affairs and Reconciliation (DAARE), currently has no entries for Aboriginal sites within the proposed works location.		Noted
	b	Remind the Proponent that the Register does not purport to be a comprehensive record of all Aboriginal sites, objects and remains in South Australia. Sites or objects may exist on the subject land even though the Register does not identify them. All Aboriginal sites and objects are protected under the Aboriginal Heritage Act 1988 (the Act), regardless of whether they are listed in the Register and it is an offence to damage, disturb or interfere with any Aboriginal site or damage any Aboriginal object (registered or not) without the authority of the Minister for Aboriginal Affairs and Reconciliation (the Minister). If the planned activity is likely to damage, disturb or interfere with a site or object, authorisation of the activity must be first obtained from the Minister under Section 23 of the Act. Section 20 of the Act requires that any Aboriginal sites, objects or remains, discovered on the land, be reported to the Minister. Penalties apply for failure to comply with the Act.	21.13	
	c	Commend the Proponent's awareness of Aboriginal heritage issues, as displayed in the PER, but note that the Report provides no evidence of an intention to consult with or involve Aboriginal people or to train construction staff in recognition of potential objects or remains. DAARE strongly recommends that the Proponent contact representatives of the Kaurna, Ngarrindjeri and Ramindjeri peoples before the project proceeds, to ensure respect for their heritage interests and well being. Contact details for these groups are provided.		4.6
<b>G5 South Australian Tourism Commission</b>				
	a	The South Australian Tourism Commission (SATC) commends Baillie Lodges and Parsons Brinckerhoff on producing a comprehensive response to the issues identified within the Guidelines Paper. The PER demonstrates that all of the Issues Identified to date can be resolved through innovative design, management or technological solutions.		Noted
	b	The SATC have no other specific comments to make in relation to the PER other than to reinforce our position in relation to this development. The SATC believes Southern Ocean Lodge presents a rare combination of development attributes and is South Australia's best prospect for competitive product in nature-based tourism. Southern Ocean Lodge is a significant strategic and economic development in the context of the States tourism industry.		Noted
	c	Southern Ocean Lodge aligns directly with South Australia's strategic directions for tourism. In particular, the development is consistent with objectives and strategies contained in the: <ul style="list-style-type: none"> <li>■ South Australian Strategic Plan</li> <li>■ South Australian Tourism Plan 2003 - 2008</li> <li>■ South Australian Tourism Export Strategy</li> <li>■ Responsible Nature Based Tourism Strategy (A joint Department for Environment and Heritage/SATC Strategy).</li> </ul>	2.5	

Type	Comment	Summary	Reference in PER	Reference in Response Document
	d	New investment in tourism accommodation has been identified as one of four critical success factors that must be overcome if South Australia is to achieve its Strategic Plan target for tourism. The SATC is concerned that there is a risk that if this development cannot overcome essentially resolvable issues, this would send a message that could irreparably damage South Australia's tourism investment reputation.	2.2	
<b>G6 SA Country Fire Service Development Assessment Unit (Bushfire Protection)</b>				
	a	The South Australian, Country Fire Service, Development Assessment Unit (CFS, DAU) has been involved with the developers architect for the past 9 months including two site inspections with regard to bushfire protection, prevention and life safety matters relevant to the development. This ongoing consultation has resulted in a 'Bushfire Management Plan', which satisfies the planning processes. Continued negotiation will occur as the project progresses with discussion to resolve identified concerns through the bushfire engineering process and application of acceptable alternate solutions.	17	
	b	It should be noted the application of 'leading edge' passive bushfire protection for building design and contraction will be applied. Passive protection will be supported with active protection management of the adjoining landscape and contained within a 20 metre native vegetation exempt zone around the buildings.	17	
<b>G7 Department for Families and Communities</b>				
	a	As the construction is to take place on an area of the island that is largely uninhabited, its construction and operation is unlikely to negatively impact on the community.		Noted
	b	The impact on families and the community appears to be mainly positive ie the increase in employment both in the construction and ongoing operation of the Lodge and the flow on benefits to the local economy.		Noted
<b>G8 Department of Trade and Economic Development</b>				
	a	The Department considers that the Proponents have comprehensively addressed the environmental, social and economic issues as detailed in the assessment Guidelines. The PER provides an appropriately balanced analysis of the likely costs and benefits that will result from the development.		Noted
	b	The Department has scrutinised the PER with particular regard to the proponent's justification for the project, the State's strategic context that supports this kind of tourism development, and the anticipated benefits that the project is expected to deliver for the region and South Australia.		Noted
	c	There has been considerable tourism investment interstate in response to international growth in this 'high end' sector. However, tourism development of this kind is generally unrepresented in South Australia's tourism portfolio, which has the effect of diminishing the competitiveness and profile of South Australia's tourism industry. Developments such as Southern Ocean Lodge will greatly assist in diversifying and raising the profile of South Australia's tourism product, which will help to boost the industry's longer term competitiveness.		Noted
	d	Suitable 'iconic' locations are not common in South Australia particularly where the tourism spend can be extended across a range of other sectors. Kangaroo Island has an advantage in maximising these benefits due to its favourable environmental attributes and the existing range of goods and services that are both necessary and complementary to enhancing the tourist experience.		Noted

Type	Comment	Summary	Reference in PER	Reference in Response Document
e		By targeting a niche 'high end' market, the development is not likely to adversely affect other accommodation providers in the region. Conversely, the development of a world-class ecotourism facility will provide broader promotional coverage for the Island which is likely to draw a greater volume of visitors, thereby producing a net economic benefit.		Noted
f		Developments of this kind can also have the effect of enhancing the branding and international exposure of local products. Kangaroo Island's reputable food industry could stand to benefit from the greater interstate and international recognition that will derive from increased visitation and tourism promotion, which could assist in export growth into key markets.		Noted
g		The Department notes that the economic success of the development will rest on the maintenance of the environment at the site, as visitors have the clear expectation of experiencing an uncompromised natural setting. The proposed measures to protect remaining vegetation and to manage the environment (with appropriate regulatory support) should be given favourable consideration in terms of achieving a sustainable development outcome. The proposal represents an opportunity to utilise natural assets to yield wide and long lasting benefits without adversely impacting on the asset value itself.		Noted
h		The Department of Trade and Economic Development supports the approval of this project on the basis of the sustained economic benefits it is likely to generate, and the project's alignment with the SA Tourism Plan 2003-2008 and the Responsible Nature-based Tourism Strategy 2005. The development will also assist with achieving the South Australian Strategic Plan target for tourism.		Noted
<b>G9 Native Vegetation Council</b>				
a		As a result of amendments to the Native Vegetation Act in 2003, the NVC is no longer able to grant consent to the clearance of a substantially intact stratum of native vegetation. Clearances of areas of intact native vegetation are only possible where that action is in accordance with the Native Vegetation Regulations.		Noted
b		In accordance with Native Vegetation Regulation 5(1 )(c) [clearance associated with major projects under Section 48 of the Development Act]: <ul style="list-style-type: none"> <li>▪ until a decision has been made on the Section 48 application, the proposal remains subject to the provisions of the Native Vegetation Act 1991.</li> <li>▪ any clearance undertaken in accordance with an approved 'major development' must be undertaken in accordance with a management plan approved by the NVC that results in a SEB on the property. That SEB can be achieved by a payment into the Native Vegetation Fund, of an amount considered by the NVC to be sufficient to achieve the SEB.</li> </ul>		Noted
c		The current proposal is within a significant area of native vegetation that, if assessed in accordance with the provisions of the Native Vegetation Act 1991, would be considered to be part of a substantially intact stratum. This issue, the environmental impacts it entails and the apparent conflict with the assessment of similar proposals requiring native vegetation clearance in South Australia forms the basis of the NVC's objection to the proposal.		3.2.4

Type	Comment	Summary	Reference in PER	Reference in Response Document
d		The NVC provided advice on the Issues Paper and that the assessment be conducted at an Environmental Impact Statement (EIS) level as an appropriate reflection of the significance of the vegetation and the potential impacts on native vegetation and the habitat it provides. While the Council notes that this was not subject to Council direction, the omission of most of that advice, including the EIS recommendation is of concern.		Noted
e		Project location justification: It is understood (via the PER and information supplied by the proponent to the NVC) that the proponent chose the site for the pristine nature of the habitat. The proponent has justified the proposed location on economic grounds: available freehold land, proximity to tourist attractions and amenity values consistent with high-end market expectations. While not offering a comment on the need for a development of this nature in South Australia, the NVC is of the opinion that the proposal could be supported in other locations that did not require the clearance of intact vegetation and the resultant potential for significant impacts to native fauna.	3.1	3.1
f		The NVC is of the opinion that it is inevitable that even the most responsible development will introduce degradation processes to a site that is otherwise largely untouched. The Council is of the opinion that in this instance this development cannot be realistically 'offset' by other works on the property. That advice reflects the intact nature of the vegetation, the lack of pest plants and animals and the potential for disturbance to existing habitat that may result from the development.	6.3.3.2, 6.5.1.2, 6.5.1.3, 6.3.2.4	3.2.3, 3.2.5, 3.2.6, 3.3
g		The NVC is concerned that consideration of alternative sites suitable for a development of this nature are not detailed in the PER report. The Council seeks further exploration of alternative sites with reduced environmental impacts on Kangaroo Island in the interests of maintaining biodiversity and ecologically sustainable development. This might include the purchase of cleared land and development of revegetation/habitat restoration program to achieve both an environmental outcome and the qualities desired for such a development.	3.1	3.1
h		Total area of impact: The footprint of the development is 1 hectare surrounded by a 1.8 ha fuelbreak where all vegetation would be maintained at 300mm height. The total 2.8ha area should be considered as the base disturbance area with additional disturbance likely due to straying visitors, new walking trails and other associated development. While the PER identifies the total area of vegetation to be removed/modified, further assessment is sought on the total impact of the development over the whole site.		3.2.1
i		Native Vegetation Regulations: The PER incorrectly asserts that alternative land uses could result in more clearance than the current proposal under various Native Vegetation Regulations (PER, Page 46). The application of each exemption, including house sites, presumes approval of other development proposals. Clearance of house sites requires the consideration by the Native Vegetation Council, including location and environmental impacts, particularly for sites supporting intact vegetation. The current development if approved, avoids these levels of scrutiny.	6.3.2.1	
j		Inconsistency in reporting: The PER is inconsistent in its reporting of potential impacts of the development on the pair of nesting Ospreys found in close proximity to the proposed development. There are conflicting details between the two biological reports regarding Ospreys. Given the potential for the development to impact adversely on this threatened species, clarification of this issue is required including a review of the recommended buffer distance (see below Potential impacts on Osprey).		3.2.6

Type	Comment	Summary	Reference in PER	Reference in Response Document
k		<p>General portrayal of potential impacts: The PER projects an unrealistic certainty that over simplifies the expected level of impacts on the overall environment and on threatened species. For example, part 6.3.2.3, page 48 of the PER describes no loss of integrity to the South Coast Regional Ecological Area as the 'proposed development is relatively minor (1 hectare)...'. This does not recognise:</p> <ul style="list-style-type: none"> <li>▪ an additional 1.8 hectare area of vegetation that would be cut and maintained at a level of 300mm as a fire break beyond the 1 hectare footprint,</li> <li>▪ disturbance to fauna may prompt changes in their habitat use, including the potential for nest abandonment. That disturbance may result from educational experiences and walks for visitors where habitat disturbance is an unintentional but unavoidable outcome. While the report suggests visitor movements will be restricted and therefore of little or no impact, the potential remains for at least some visitors to investigate towards the coast, possibly the beach and other areas. The possibility of fauna disturbance, in particular to threatened species eg. Osprey and Hooded Plover, and the introduction of weeds and soil bourn disease via foot traffic, remains a significant risk,</li> <li>▪ the introduction of edge effects (light, weeds, disease, disturbance) from all cleared areas (including walking tracks) into a previously unopened area. This facilitates land degradation processes that cannot be prevented by the most ecologically sympathetic site management.</li> </ul>	6.4.2.2	3.2.2, 3.2.6
l		<p>Where the level of an environmental impact is not easily known prior to the event due to for example, the tolerance of sensitive species to ongoing disturbance or changed environmental conditions, the impact should be expected to be high.</p>	6.4.2.2	3.3
m		<p>Potential impacts on Osprey: As a species particularly sensitive to disturbance, the Osprey issue must be considered extremely carefully. Despite recommendations contained in the PER there is no agreed/known acceptable buffer distance to minimise the potential disturbance for this species. This is not well conveyed by the PER, which instead recommends a buffer distance of 250m. Given that the proposed development site is 1.1km from the Osprey nest site, and that the proponent suggests that visitors would not wander far from the development or require access to the coast, there appears no justifiable reason why the buffer distance should not be at least 1km. This would demonstrate that the proponent recognises the Osprey's serious requirement for no disturbance, and good faith towards conserving the habitat for other wildlife.</p>	6.4.2.2	3.2.6
n		<p>The proponent submitted a significant environmental benefit proposal to the NVC at its meeting in May 2006. That proposal included two scenarios that the Native Vegetation Council considered did not achieve the required SEB. These were:</p> <ul style="list-style-type: none"> <li>▪ place 98ha under Heritage Agreement and a \$37,924 payment into the Native Vegetation Fund, or</li> <li>▪ establish a 'Southern Ocean Lodge Environment Fund' with levies exacted from hotel rooms at \$10 per night when the occupancy rates for the proposed development exceed 60%. The proponent estimates a possible \$50,000 per year could be spent on local environmental programs.</li> </ul>		NSG

Type	Comment	Summary	Reference in PER	Reference in Response Document
	o	<p>Scenario 1: The suggestion of placing a Heritage Agreement over the remaining native vegetation on Lot 9 is not of itself considered to offer a significant environmental benefit. Heritage Agreement status does of itself not result in an improved management of the native vegetation on the property (SEB proposal, pg 5).</p> <p>The Native Vegetation Council acknowledged that the inclusion of the land under a Heritage Agreement may place a degree of protection against future expansion of the development and the associated additional clearance of habitat</p>		NSG
	p	<p>Scenario 2 Describes a purely financial SEB. While the potential for a payment into the Native Vegetation Fund is consistent with the Native Vegetation Regulations, considering the high ecological value of the site, that there may be no SEB payment for sometime after construction and that occupancy may fluctuate according to unpredictable economic factors, there is a lack of certainty with this option that prevents the Council from considering this as something that on its own would achieve the required SEB.</p>		NSG
	q	<p>The Native Vegetation Council resolved at its meeting of 3 May 2006 that:</p> <ul style="list-style-type: none"> <li>▪ it does not oppose the establishment of a tourist of the kind outlined in the proposal, however is strongly of the opinion that the location of the proposed development is inappropriate given the potential impact on areas of intact native vegetation and threatened species,</li> <li>▪ the clearance is inconsistent with the objects of the Native Vegetation Act 1991, as they relate to the protection and management of areas of intact native vegetation in South Australia,</li> <li>▪ it does not support the clearance of native vegetation for the construction of the proposed Southern Ocean Lodge on the basis that it is considered to be seriously at variance with a number of Principles of Clearance under the Native Vegetation Act 1991,</li> <li>▪ in the opinion of the Council the significant environmental benefits offered as part of the proposed development and consistent with the provisions of Native Vegetation Regulation 5(1 )(c) do of themselves, not result in an environmental benefit as required by that regulation.</li> </ul>		3.1, 3.2.1
	r	<p>The Native Vegetation Council acknowledges that the final decision on approval of the proposed development rests with the Major Development Panel. In the event that the project is approved the Native Vegetation Council requires the Panel to direct the applicant to seek direction from the Council on how to achieve the required Significant Environmental Benefit.</p>		NSG
<b>G10 Planning SA</b>				
	a	<p>4.6.1 - Clarification on whether accessing water from the bore supply is part of the proposal or not, and clarification on whether rainwater collection will be sufficient to meet needs of lodge at all times? If some bore water use is likely to occur then more information is required. In particular</p> <ul style="list-style-type: none"> <li>▪ Will the construction phase include installing the pipe from the bore to the lodge and what are its potential impacts?</li> <li>▪ Are the groundwater supplies and associated flow rates adequate. Local knowledge suggests that they and are not well understood</li> </ul>	4.6.1, 10.1	4.1

Type	Comment	Summary	Reference in PER	Reference in Response Document
	b	Could the staff quarters be located elsewhere eg in an area where vegetation removal was not required, either on this title or a nearby location? Is it possible to have staff working on a rotational shift basis so that fewer cabins are required eg 2 staff staying at lodge each night (between 1 lpm-6am) to provide 24 hours service if required?		4.4
	c	Is Baillie Lodges seeking Eco Certified "advanced ecotourism" status for the proposal?		NSG
	d	Will use of the helipad be strictly confined to emergency uses only ?		3.6.2
	e	Is any signage proposed on the South Coast Rd?		3.6.2
	f	7.2 Planning Strategy. Response in the PER is brief. More detailed assessment should be provided including that against the following relevant strategies: <ul style="list-style-type: none"> <li>▪ Economic Strategies 11 &amp; 12b</li> <li>▪ Environment &amp; Resources 3b &amp; e, 5a, 6g &amp; 17b</li> <li>▪ Kangaroo Island Planning and Development Area Strategies 14c,e &amp; f &amp; 5</li> <li>▪ Development Plan (Appendix J)</li> <li>▪ Comment on Environmental policies (p5) refers to the 'productive garden', which the PER report states has been removed.</li> <li>▪ A number of relevant policies in the Kangaroo Island Development Plan have not been commented on including Council Wide Objectives 70 &amp; 71 and PDC's 213, 217, 248 &amp; 249</li> <li>▪ PDC 16 which lists non-complying types of developments is also not specifically addressed. Please address this in view of the fact that the proposal could potentially be considered non-complying when taking into account the staff village accommodation.</li> </ul>	Appendix J	3.8
	g	17.7.1- What number of people could be safely accommodated in the safe bushfire refuge area? If the lodge was fully occupied, would it be necessary for the beach to be also used as a refuge area?		3.4
	h	17.8.2 Are there any potential environmental impacts from using fire fighting foam in a coastal area ?	17.8.2	3.4.1
	i	Guideline 5.2.23 which related to ecological burning to manage biodiversity on the site is not covered in Section 17		3.4.1
	j	Is the irrigation system comprehensive enough to ensure complete overlap of sprinklers.?		3.4
	k	In the fire management section it apparently states that the vegetation will be pruned in 300mm to manage fire. Can these species survive continual pruning to this height?		3.2.2
	l	Is the plunge pool referred to in the water report that small pool which appears on the lower terrace of the main lodge?	Appendix D	
	m	What methods will be used to attract and retain staff in such a remote location?		4.4
	n	Has there been a traffic study prepared that assesses the potential impact of increased traffic on South West River Rd?		3.6

Type	Comment	Summary	Reference in PER	Reference in Response Document
o		If rainfall is not enough have the proponents looked into the possibility of requiring future approvals for the use of bore water on Kangaroo Island? (At the moment they are not required but this may be the case in future as with many parts of the state.)		4.1
p		Construction should take place outside Osprey breeding season to avoid disturbance. Construction should also take place outside the migratory season. The report describes the impacts of feral cats and states it will develop a feral Management plan however this has not been included in the report.		3.2.6
q		The report states the water will be treated but the actual process to be used is only discussed as options in Appendix E. Which option is the proponent going to use and what are the potential impacts of the chosen option ie the use of chemicals?	10.2.1, 10.2.2.1	4.1
r		Will the area disturbed be revegetated if the development requires decommissioning?		4.8
s		It is not properly explained why the project is likely to have no impact on the Collared sparrow hawk and the Nankeen Kestrel- if these species are disrupted by the development and habitat is removed then the project is likely to have an impact.		3.2.6
t		Having information in rooms for guests to read regarding the appropriate behaviour in the lodge and the surrounding environment may not be effective as people may not read it. Therefore it may be more effective if guests are informed when they check in.		Noted
u		During construction the water will be diverted away from the buildings. Will this be done during the operational phase and if so how?	10.3	4.1
v		On page 122 the report states that organic waste will be composted on site for use in the productive garden however in section 6.5.2.1 it states that the plan for this garden has been disregarded.		3.8
w		All vegetation along lay down areas and areas that will be rehabilitated after construction should have the vegetation cleared from these areas re-spread over them to reduce the possibility of erosion and increase the potential for natural regeneration	22	3.2.3
x		Some construction inspections should be undertaken by the project manager or another impartial person to gain an independent view of construction.	22	Noted
y		In section 22.12 it states that Hooded Plovers will be visually monitored. If there are sightings the information should be recorded including their location. All construction personnel should be made aware of these birds so that they can be easily identified	22	3.2.6
z		Section 22.17 should also include "ensure all at risk contractors and vehicles entering the site use the wash down areas" At the moment it only states this when leaving the site.	22	4.3
aa		Section 24- the chemicals and hazardous materials management should state that other chemicals that may be required, such as acids, must be kept within the bunded areas.	24	Noted
ab		Has power generation options used in Aboriginal Communities (eg solar farm in AP Lands) been thoroughly investigated as an alternative source of power to generator?		3.6.1

Type	Comment	Summary	Reference in PER	Reference in Response Document
	ac	Why is there only a 250m buffer around the Osprey when ideally there should be 400m?	6.4.2.2	3.2.6
<b>*G11 Department of Transport, Energy and Infrastructure – Transport Services Division and Transport Planning Division</b>				
	a	<i>Raise no objection to the Public Environment Report.</i>		Noted
<b>MP1 Michael Pengilly MP</b>				
	a	Appreciative of the thoroughness of information & considerable information sources.		Noted
	b	The multitude of advice and professional opinion could not be disputed nor faulted.		Noted
	c	Knows the area and has visited the site plus agrees that Council's Development Plan allows for the proposal		Noted
	d	No foreseeable reason why it should not be approved in due course.		Noted
	e	Sources have revealed that there are State Government departments that oppose the development for reasons that seem philosophical and not sensible.		Noted
<b>LG1 Kangaroo Island Council</b>				
	a	Council considered the PER and passed the following resolutions at the 10 <sup>th</sup> May meeting:		
	b	Council does not support the proposed development in its present proposed location.	3.1	3.1
	c	In the event the development is approved, the upgrade of Hanson Bay Road should be at the cost of the Southern Ocean Lodge	4.7	3.6.2
<b>*LG2 Kangaroo Island District Bushfire Prevention Committee</b>				
	a	<i>The frequency of fires in the vicinity of the site is underestimated due to the omission of fires that occurred in 1954, 1958, and 1970, all of which either burnt the site or to within 5 kms of it. Thus the bushfire risk to the development has been underestimated. The reference to bushfire events resulting in the destruction of many thousands of hectares is misleading, wildfire events are natural occurrences and are an integral part of the Island's ecology resulting in cyclic renewal of areas of native vegetation. Bushfires will continue to happen in the future, despite the best efforts of the community to prevent and suppress them, and they have the potential to have significant impacts on assets.</i>		Noted
	b	<i>The overall fuel hazard for the vegetation that occurs on the site of the development was assessed by the Fahrenheit 451 Fire Management Project (Dowie 2005) as extreme in the northern section, very high through the centre section and high in the section immediately adjacent to the coast. Therefore the proposed development will be exposed to a significant bushfire threat on days of very high to extreme fire danger.</i>		3.4

Type	Comment	Summary	Reference in PER	Reference in Response Document
c		<i>The highest bushfire threat to the buildings will be from the north-east to west due to winds from these directions being associated with high temperatures, low humidity and high speeds during the bushfire season. This exposes the proposed development to a significant bushfire threat as the north-eastern, northern and western sides of the buildings are adjacent to very high fuel hazard. The lower fuel hazard to the south of the buildings will not reduce this high level of threat. Extensive areas of glass on the northern faces of the main buildings will be vulnerable to radiant heat. The design of the buildings exposes the maximum area of the buildings to the maximum bushfire threat due to their east-west orientation and the consequent exposure of the northern and western aspects to very high fuel hazard. The ridge to the west of the buildings is unlikely to significantly reduce fire intensity or forward rate of spread in high, very high or extreme fire weather conditions.</i>		3.4
d		<i>On the plan of the fire protection system there are 101 garden butterfly sprinklers with a water consumption rate of 10 litres/min which equates to an hourly consumption rate of 60,600 litres. There appear to be at least 250 under-eave sprinklers and 54 roof mounted sprinklers (the detail in the plan is poor making it difficult to determine actual numbers). These sprinklers have a consumption rate of 4 litres/min which equates to an hourly consumption rate of 72,960 litres. Thus to run the sprinkler system for one hour will consume 133,560 ltrs of the 150,000 litres of fire fighting water storage. This leaves just 16,440 litres available for use in the hose reels, or just over 20 minutes of operational time (16 hose reels @ 47 litres/min). These figures indicate that there is barely enough water available to adequately protect the development from bushfires given that the buildings will be subjected to prolonged ember attack for a considerable period of time prior to the arrival of the fire front.</i>  <i>The butterfly sprinklers spray water droplets into the air to provide a blanket of water to saturate buildings and vegetation ahead of an approaching fire front. This both extinguishes embers and cools radiant heat. Under extreme weather conditions however, an approaching fire front will generate very strong, super-heated winds that will preheat any pre-fire saturated vegetation/buildings and cause any aerial sprays to be largely ineffective.</i>  <i>It is stated that there will be a 100% overlap in sprinklers placed adjacent to the buildings. The Fire Protection System Plan indicates these sprinklers have a six metre radius but they are shown as being twelve metres apart on the Fire Protection System Plan. This spacing does not allow for any overlap and in the high winds associated with very high or extreme fire weather will result in discontinuous wetting of vegetation. To achieve the stated 100% overlap will require doubling of the number of perimeter sprinklers. This will increase the hourly rate of water consumption to 194,160 litres which is in excess of the stated fire fighting water storage capacity. This will have significant implications for the amount of water storage required to operate the system and the capacity of fire fighting pumping systems.</i>  <i>No provision has been made for additional protection of diesel and gas storage in the event of a bushfire. The close proximity of the fuel storage to the safe refuge area is an issue that should be addressed.</i>		3.4.1, 3.4.2
e		<i>Evacuation of staff and guests to the beach should not be considered as a strategy under any circumstances in the event of a bushfire threatening the proposed development. This would expose staff and guests on the beach to extreme radiant heat, embers and smoke. Superheated air could result in a difficulty to breathe and the burning of internal soft tissue in the lungs and trachea. In addition to this there is an increased risk of staff and guests being exposed during their 400 metre walk from the buildings to the beach.</i>		3.4.2

Type	Comment	Summary	Reference in PER	Reference in Response Document
	<i>f</i>	<p><i>It is stated that the bushfire threat to the development will be managed without reliance on outside resources. In order for staff to become proficient in the fire fighting skills required to adequately protect the buildings and guests during a bushfire they will need not only training but also fire fighting experience. Maintaining adequate levels of training and experience of enough staff to be able to carry out on site fire fighting and management of guests will be extremely difficult given the usual high levels of staff turn-over in the hospitality industry. Without the required level of training and experience the proposed protection measures and strategies are unlikely to be effective in protecting staff, guests and assets on the site in the event of a bushfire.</i></p> <p><i>The provision of a small fire unit on the site is supported so long as there are suitably trained and experienced staff to operate it safely in the event of a bushfire threatening or originating on the site and the unit is maintained to a high operational standard.</i></p>		3.4.2
	<i>g</i>	<p><i>No reference has been made to what strategies will be used to reduce the likelihood of fire ignition on the site.</i></p>		3.4
	<i>h</i>	<p><i>No reference has been made to what strategies and management actions will be put in place to ensure that the ecological processes on the site will be maintained. Natural disturbance regimes such as periodic fire events will need to occur in order for the biodiversity of the site to be maintained.</i></p>		3.4.1
	<i>i</i>	<p><i>Under extreme conditions burning native vegetation 300 mm high may result in flame heights in excess of 3m.</i></p>		3.4
	<i>j</i>	<p><i>No reference has been made to the preparation of a Fire Management Plan for the property. This would be considered fundamental and essential. Such a document will be required to direct fire prevention and protection measures and to address the need to consider fire as part of the long-term ecological management of the site if the development is to be ecologically sustainable. Such a plan could incorporate some form of research or monitoring component to advance the understanding of fire effects on the areas flora and fauna.</i></p>		3.4

\* Submissions in italics were received after the due date of May 17 2006.

## **Appendix C**

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Key issues from public submissions

## Key issues from public submissions

The following is a summary of the key issues raised in the public submissions on the Southern Ocean Lodge PER document.

Codes: PER = Public Environment Report, RD = Response Document, NSG = Not in Scope of Guidelines

Comments	Response
<b>Site Selection and evaluation</b>	
The environmental impacts caused by the project could be minimised if the development was located where there has already been some human disturbance. Developers could lead the way in re-vegetating a site for an eco-tourism project.	PER 3.1 RD 3.1
The development is located in one of the most biologically intact areas of the island.	RD 3.1
The report gave no economic and environmental statistics from other eco-lodges.	NSG
Encumbrances cannot be guaranteed beyond the short term.	PER 3.3 RD 3.6
The development is not in the correct zone according to the Tourism Plan.	PER 7.1
Inadequate justification was given in the report for the location of the site from an environmental and economic perspective.	PER 3.1 RD 3.1
The development may set a precedent for future development.	PER 3.3
The report should have given more consideration of alternative sites.	PER 3.1 RD 3.1
<b>Environmental Management</b>	
All management procedures are done 'in-house'. There was no scope for independent inspection or public access to monthly data within the report.	RD 4.3
No plan was given for when environmental information will be imparted to guests and whether it would be compulsory or not, within the report.	PER 23.5
The environmental survey included in the report does not reflect a thorough research base.	Undertaken to meet Guidelines
<b>Flora</b>	
The Lodge will degrade the link between Flinders Chase National Park and Kelly Hill Conservation Park.	RD 3.3
The report was not clear on the impacts of edge effects.	PER 6.3.2.5 RD 3.2.2, 3.2.6
The report gave no consideration of vegetation clearance causing a change in wind dynamics leading to greater sand movements or 'scalds'.	RD 3.2.3
The report dismissed significant ecological issues as either being of minimal effect or a minor issue.	RD 3.3
Revegetation should use local provenances not endemic species.	PER 6.3.3.2 RD 3.2.3
Deliberate pruning will be detrimental to many of the plants – they are attuned to fire as a means of pruning, with some browsing by mammals and it will lead to the loss of canopy and mid-storey vegetation.	PER 17.6.1.1 RD 3.2.2
Vegetation 'modification' is a form of clearance thus cleared area will double to 2.8 hectares.	RD 3.2.1
Vegetation clearance for access tracks is likely to be more than 5 metres and does not include turning bays.	PER 4.8 RD 3.2.1
The developer fails to understand the impact of fragmentation on the wilderness.	PER 6.3.2.6 RD 3.3

Comments	Response
It is unclear if further clearance at the helipad will be required for safe operation.	RD 3.6.2
It has not been indicated in the report how vegetation clearance figures were calculated.	PER 6.3.2.1, 17.8.1 RD 3.2.1
Regionally rare and endangered species: sand brome, KI trigger plant, spiky saw-sedge, native lilac, coastal silver wattle (and possibly short hair plume-grass).	PER 6.3.1.2
Nationally rare species: <i>Calytrix smeatoniana</i> spp., <i>Albopurpurea</i> , <i>Hydrocotyle comocarpa</i> , <i>Micranthemum demissum</i> and <i>Petrophile multisecta</i> .	Noted
On State Register as rare: <i>Choretum sicutum</i> and <i>Gastrodia sesamoides</i>	Noted
<b>Fauna</b>	
The Osprey, Hooded Plover, Southern Brown Bandicoot, Kangaroo Island Dunnart and Heath Rat are listed under the Commonwealth governments "15 National Biodiversity Hotspots" and live in a habitat type proposed for removal.	RD 3.2.6
Increased activity will impact on the Osprey - their nests are vulnerable to desertion should the level of disturbance increase (there is a nesting pair at the site).	PER 6.4.2.2 RD 3.2.6
The buffer zone distance to Osprey nests is in-adequate.	PER 6.4.2.2 RD 3.2.6
Increased activity will disturb the breeding and feeding of hooded plovers.	PER 6.4.2.2 RD 3.2.6
Habitat loss will increase pressures on the Southern Brown Bandicoot and Kangaroo Island Dunnart.	PER 6.4.2.2 RD 3.2.7
The Western Whipbird and the Bush Stone Curlew (endangered under State legislation) may be present in the native vegetation of the proposed site.	PER 6.4.2.2
No mention of the impact of night lights, noise of smoke from generators on Remarkable Rocks and all the surrounding environments was given in the report.	PER 6.4.2.4 RD 3.2.2, 3.2.6
No guarantee was given in the report that all recommendations from the Biological and Bird Survey will be implemented.	PER 21 & 22 (EMP)
No survey has been done following a fire. The report has not adequately canvassed the past or future.	NSG
The report did not indicate how fauna will be prevented from accessing food waste.	NSG
The Botanical and Bird Survey did not include other fauna species and invertebrates.	Met requirements of Guidelines
Currently too little is known about the ecology of Kangaroo Island and its eco-systems to allow such a development to proceed without consequences.	NSG
The report did not consider management strategies for feral cat populations.	PER 23.13 RD 3.2.6
<b>Weeds</b>	
Soils disturbance in dune areas will lead to the invasion of weed species that will leave long lived seeds (especially Bristly Poppy which is often only seen after disturbance).	PER 6.5
The report did not indicate if any hygiene practices have been employed to date to prevent vehicle/heavy machinery introducing Phytophthora and weed species.	NSG
<b>Sustainability</b>	
The development will only benefit a few financially and will degrade the pristine status of the island for the majority.	PER 13.2, 13.3, 13.5 RD 3.5
Report did not show how the development supports the precautionary principle.	PER 15.1.3
Development contradicts principle of sustainability.	PER 15
Long-term impacts were not analysed or addressed in the report.	PER 15.1.2

<b>Comments</b>	<b>Response</b>
The report does not provide any information on sustainability monitoring and whether operations will be reviewed and modified if a high level of sustainability is not maintained.	PER 15.3
<b>Landform</b>	
Chosen site is a fragile dune system, prone to erosion and slow recovery. Even minor disturbances are likely to elevate erosion impacts.	PER 9.2, 9.4 RD 3.2.3
Developer claims to divert water from non-vegetated areas but it is not stated where the water will go.	RD 4.1
Re-vegetation of bare areas will be difficult and slow. Therefore, long-term impact will be much larger than the 1 hectare stated in the report.	RD 3.2.1, 3.2.3
<b>Coastal Processes</b>	
The 100 metre buffer between the development and high water mark will be inadequate if there is a failure to contain stormwater or in the event of an extreme coastal erosion event.	RD 4.1
The report did not consider experience from other constructions on the southern coastline which suggest that erosion will be difficult to control and reverse.	RD 3.2.3
<b>Water Management</b>	
The report did not show treatment areas for the Biolytix System on any of the plans.	PER 10.2
Supply of bore water relies on good will of nearby land owners. The proponent can give no guarantee of water supply from bores in the future.	RD 4.1
Eco-tourism developments should be self-sufficient for water and waste.	Noted
It is unlikely that tourists will minimise water usage.	PER 10.1 – water-saving measures implemented
It is unclear whether the estimated supply of water is achievable compared with the availability of groundwater.	RD 4.1
The 'wellness spa' is at odds with the concept of water conservation.	PER 10.1 – water-saving measures implemented
The report failed to include an adequate analysis of available rainfall data and trends.	PER 10
There are concerns that waste water will eventually reach the coast through seepage.	RD 4.1
The report states groundwater can be used if needed from a bore 2 kilometres away, however does not mention the construction of a pipe or other means of transporting this water and its subsequent impacts on the environment.	PER 10.1 RD 4.1
The disused bore mentioned in the report is presumably the deep bore at Kangaroo Island Wilderness Resort. No geological evidence given to suggest that the aquifer is recharged annually.	PER 10.2 – bore located on Hanson Bay Sanctuary RD 4.1
No flow rates for the bore were provided, casting doubt on fire fighter reserve volumes.	RD 4.1 – Use of bore is not included in application
No consideration was given to the effects of salinity of bore water and sea-spray in rainwater affecting the Biolytix system's ability to purify water.	NSG
<b>Economics</b>	
No evidence is given to support the economic viability of the development or economic sustainability of environmental monitoring measures given in the Environmental Management Plan.	PER 13
Monetary figures quoted in the report had no timeframe attached.	NSG
There are concerns that the development will lead to increased commercialisation of Kangaroo Island and Hanson Bay.	PER 13
The cost of overnight stay limits clientele to a very select market.	Noted

<b>Comments</b>	<b>Response</b>
The project offers no widespread benefits for the local community.	PER 13.2, 13.3 RD 3.5
The report does not make it clear where the \$0.45 million in additional spending will be directed.	PER Appendix L
The report gave no triple bottom line analysis to compare the development with other parts of the tourism sector and/or within the same sector.	NSG
The style and placement of the development means staff will predominantly fly-in and fly-out.	PER 4.7
There is concern over the viability of the facility given increasing oil prices which affect diesel fuel and aviation costs.	NSG
<b>Fire and Emergency Procedures</b>	
The proponent has demonstrated a poor knowledge of fire in Mallee vegetation.	RD 3.4
The report gave a technical error relating to perimeter vegetation saturation. 100% overlap will require double the number of sprinklers which will in turn require double the amount of water.	PER 17.6.2.1 RD 3.4
There are concerns that the amount of water supplied for fire fighting will be inadequate.	PER 4.6.7, 17.6.2.5 RD 3.4.1
The report did not mention insurance related to fire risk.	NSG
It is not clear how people will be evacuated in a bush fire if the road in and out of the development is blocked.	PER 17.5.1, 17.6.1.3, 17.7.1 RD 3.4.2
The figures given in the report relating to sprinkler numbers and water storage means that after one hour of sprinkler operation there will only be enough water left for 8 minutes of hosing.	PER 17.6.2 RD 3.4.1
The fire management plan should be independently re-assessed.	RD 3.4
The report gave no indication of additional protection for the diesel and gas storage areas in the event of a fire.	RD 3.4.2
The report stated that staff and guests could be evacuated to the beach in the event of a bushfire. This should not be considered a viable evacuation strategy due to high risk and danger involved with this evacuation route.	PER 17.7.1 RD 3.4.2.
Maintaining adequate levels of fire training, as the report recommended, is unlikely to be effective in protecting staff, guests and assets on site.	PER 17.7.2 RD 3.4.2
More detail is required as to what will occur in an emergency as there is no ambulance based at Parndana, RFDS from Vivonne Bay is unheard of and the closest is at Gosse, backup from Kingscote (1 hour away).	PER 17.7.3, 18
The report gives no reference to management strategies post fire.	RD 3.4.2
The report does not identify any strategies that will be implemented to reduce fire ignition on site.	RD 3.4
Will guests be warned of the risks of this remote location ie. Emergency evacuation, safety implications and costs?	Management issue – NSG
It is not clear what the effect of fire fighting chemicals will have on the environment.	PER 17.8.2 RD 3.4.1
<b>Power</b>	
Power generators will increase greenhouse pollution, noise, smoke and are prone to disruption.	RD 3.6.1
The report does not make clear what the impact of power consumption will have on other users in the grid.	PER 4.6.3
The report does not make clear why solar or wind energy was not used instead of diesel or gas power, especially as this is proposed as an eco-tourism venture.	PER 4.6.3 RD 3.6.1

<b>Comments</b>	<b>Response</b>
No consideration of dangers related to diesel generators and storage was given in the report.	RD 3.4.2
The north south orientation of the development does not maximise the use of the winter sun.	PER 4.3
The project proposes the use of large windows which will cause large amounts of energy loss.	PER 4.3
<b>Construction</b>	
The report gives no indication of who will inspect the construction activities and who will audit the inspectors.	PER 22.2
No details are given as to how four water storage tanks totalling 1.2 million Litres will be installed without disturbing the landscape.	Construction details are to be confirmed
Will changes be made to building/infrastructure plans if problems arise during construction?	PER 22 (EMP)
The report does not appreciate the difficulties of construction.	Construction details are to be confirmed
<b>Heritage</b>	
The wording relating to a heritage agreement varies throughout the report and no firm decision has been made.	RD 3.3
The report did not mention that the development is within the 'Tandanya Natural Area' which is on the Register of the National Estate.	RD 4.6
<b>Legislation and Development Plan</b>	
This development should have been subject to the full Environmental Impact Assessment process.	NSG
It appears that the development contravenes several principles of the Natural Resource Management Act 2004.	PER 6.2.4
The Major Development process has been used inappropriately to bypass the Development Plan and the Native Vegetation Act.	NSG
The report did not adequately assess the development according to Ecologically Sustainable Development.	PER 15
The development contravenes the Costal Landscape Zone of the Development Plan and other general objectives and principles.	PER 7, Appendix J RD 3.8
<b>Transport and Access</b>	
The project will require the Hanson Bay Road to be bituminised at some point in the future at considerable cost to the government.	PER 4.7, 4.8 RD 3.6.2
There are concerns with the increase usage of Hanson Bay Road.	PER 4.8 RD 3.6.2
No detail was given as to where the beach access paths will be or what they will be made of.	PER 4.9
Recommendations from the Botanical and Bird Survey for location of walkways has not been adopted.	PER 21 & 22 (EMP)
<b>Decommissioning</b>	
The report gave no indication of procedures if the development is sold or closed down.	PER 5.7 RD 4.8
<b>Waste</b>	
The report did not address how solid waste would be managed.	PER 11.3, 21.4, 22.5, 23.7
The report did not address how the increased nutrient levels in the soil due to solid waste disposal would be managed.	No disposal on-site

Comments	Response
<b>Community</b>	
Local food may not be used as it doesn't satisfy the developer's aims.	NSG
No staff units appropriate for families were detailed in the design. There are also no additional school numbers available for staff members' children.	Noted
The employment opportunities the project provides for locals will be limited to Laundry and Maintenance.	13.5

## **Appendix D**

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Fire protection plan

# Fire protection plan

