



15 January 2018

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Via email: damian.miley@sa.gov.au

*Cc: Hon Ian Hunter MLC, Minister for Sustainability, Environment and Conservation  
Ms Sandy Pitcher, Chief Executive, Department of Environment, Water and Natural  
Resources*

**RE: Proposed disposal of Crown land Sect 507, Hundred of Dudley, and allotment  
1 in Deposited Plan 76540 (coastal reserve land)**

Dear Mr Miley,

Conservation SA is an independent, non-profit and strictly non-party political organisation representing around 60 of South Australia's environment and conservation organisations and their 90,000 members.

Conservation SA welcomes the opportunity to provide comment on this proposed disposal of public land at Pelican Lagoon, Kangaroo Island.

**We express our deep alarm and concern at the proposed sell-off of this coastal reserve land without appropriate investigation or assessment, the loss of access to this land by the general public, and the precedent this sale will create.**

**This land is not 'surplus', but rather a vital and integral part of the coastal strip of this region, and the coastal reserve system of the state.**

Our primary concerns:

1) The process

This sale process cannot be considered separate from the proposal for a golf course in the vicinity. Our understanding is that the original golf course layout was on private, cleared former farmland set back from the coast, and development approval was granted on this basis.

The developers then sought and obtained approval by the Planning Minister for a variation which involved a major revision of the design, layout and location. The golf course is now intended to be built predominantly on crown land (obtained via lease or sale), and this land is of significantly higher heritage and environmental value, and right up to the sea front.

Yet, despite this major revision in the proposal, no appropriate public consultation nor environmental or heritage assessment of the merits of the original proposal (and the impact on the public land) has been conducted.

This is an appalling process, and has dismayed many. It is clear that changes are required to strengthen legislation related to both the development approval process and sale/lease of crown land.

The outpouring of concern by the public on the YourSAy website is indicative of a deep skepticism that this sale is being conducted with due process and with appropriate checks and balances.

Any Minister or Government who ignores this public concern does so at its peril.

## 2) The land is clearly not 'surplus'

To sell this area of coastal reserve means that it must be declared to contain "no significant conservation or heritage values that warrant retention of the land in Crown ownership". This is clearly not the case.

The land in question (and several adjacent crown land parcels on which development has been approved) have not been subject to environmental and heritage assessment. Therefore, there is no measureable information to substantiate the claim that the land is 'surplus' and has no use to the government.

What little is known clearly indicates the land has significant conservation value because of its high value remnant vegetation (it has a vegetation rating similar or higher to many other coastal reserve regions on KI) and heritage significance (including at least two Aboriginal artefact scatters). It also acts as an important wildlife corridor between the Dudley Peninsula and west of the Island, and present are resident ospreys, white-bellied sea eagles, Southern Brown Bandicoots, Little Penguins and other vulnerable and threatened species.

Less populated cliff areas like this one are important breeding zones for osprey and white bellied sea eagles. Too much human disturbance can lead to nest site abandonment.

## 3) A dangerous precedent

To sell off this coastal reserve would set a dangerous precedent for the state government to dispose of coastal reserves on other parts of KI and other regions of South Australia.

The coastal reserve system in South Australia is an extraordinary asset owned by the people of South Australia. Already, much of it has been lost, so it is essential that all remaining areas be kept in public hands. The need for public ownership and control of coastal reserves will only build over time as the impact of climate change increases.

All this land should remain for the benefit of the environment and the enjoyment of all South Australians in perpetuity, not sold off to private developers.

#### 4) Keeping public access

Public access should be a default right on all public coastal land, unless there are significant safety or environmental reasons for denying entry. However, selling off public land to private developers immediately removes that right.

The original golf course proposal involved the maintenance of public access along the cliff top. The revised design has removed this.

We reject the assertion that this land is difficult to access and 'practically nobody' goes there. We understand that many avid walkers access and walk those cliffs.

The wonderful success of the KI Wilderness Trail shows the clear appetite for visitors to experience this type of wild, cliff top landscape. Sale of this land would compromise any future potential for expanding walking tourism along this part of the island cliff tops and coast.

Please contact me if you have any questions about these comments.

Yours sincerely,



Craig Wilkins  
Chief Executive