

DIT:Planning Reform Submissions

From: matt farrell [REDACTED] >
Sent: Thursday, 17 December 2020 7:12 PM
To: DIT:Planning Reform Submissions
Subject: Draft Planning & Design Code
Attachments: SWAG Planning Code Submission to DIT 17 DEC 20.pdf

Categories: John

Hi,
Please find attached the Sellicks Woodlands Action Group (SWAG) submission to the Draft Planning & Design Code.
Should it be possible, we would like to present our case in person.
Thank you for your consideration.

Yours sincerely,
Matt Farrell.
On behalf of,
Sellicks Woodlands Action Group.

SELICKS WOODLANDS ACTION GROUP
SUBMISSION TO THE SA PLANNING CODE
Authors: Matt Farrell and Dr Laura Deane 18 December 2020

Sellicks Woodlands Action Group (SWAG) has formed to register strong opposition to the Onkaparinga City Council's (OCC) draft *Sellicks Beach Structure Plan* released for consultation in November 2020. We are concerned about proposed changes to the SA Planning Code that could prioritise developers over people in areas like Sellicks Beach. We propose an alternate plan that addresses the existential threats of climate change and biodiversity loss and respects the cultural significance of the land and the character of the current township of Sellicks Beach.

The proposed changes allow developers to directly approach State Government while bypassing local government, and Sellicks residents are concerned that the opportunities for public consultation, and indeed opposition to proposed developments, will be diminished. In recognising this, our local Councillor, Simon McMahon, observed that 'developers are chomping at the bit'¹ to have the changes passed as soon as possible. We strongly oppose the *Sellicks Beach Structure Plan (Draft)* released by Onkaparinga City Council for public consultation in November 2020 which will allow for a scale of residential development in Sellicks Beach that will forever change its character. This is because the proposed development will allow for blocks as small as 350m² in the Housing Choice area², and will at least double the size of the suburb and population if 1500 residential allotments are approved, and worse, quadruple the size of the population if as many as 4200 new dwellings are approved³.

We write as residents of Sellicks Beach concerned about the proposed development. SWAG contends that the *Structure Plan* and associated development unfairly and unjustly prioritise the rights of developers over the rights of local communities and ignore the existential threats of the climate crisis and biodiversity loss. We note that OCC has extended its public consultation with the Sellicks Beach community about proposed large-scale development and suburbanisation of

¹ South Sellicks Action Group (SSAG) Minutes of meeting with Cr Simon McMahon, 30 November 2020

² Onkaparinga City Council, 27 October 2020, *Sellicks Beach Structure Plan (Draft)*, p. 36.

³ At a community meeting hosted by the Sellicks Area Residents Association (SARA), June 5 2019, Onkaparinga Council Senior Planning Policy Officer, Alison Hancock, stated the development could allow for as many as 4200 new dwellings if Onkaparinga Council and the Sellicks community did not act to stop this. Minutes, SARA meeting, 5 June 2019.

the town until 21 February 2021, partly as a result of rescheduling under COVID safe measures imposed in November, and partly in response to vocal opposition by the Sellicks community. We welcome the extension of the public consultation until February 2021 and have asked Onkaparinga Council to strongly advocate for an extension of the new SA Planning Code consultation beyond Friday 18 December to allow for proper consultation between Council and the Sellicks community to inform the Review.

BACKGROUND

Our opposition to the proposed development of Sellicks Beach is based in concern that the development will damage the culture, environment, and character of this unique and iconic coastal town. Sellicks Beach is a small rural coastal village with a population of 2616 residents, according to the 2016 Census, located on the peri-urban fringe. Such areas are identified in Council documents as being most “vulnerable” to over-development and resultant loss of natural environments and biodiversity⁴. Indeed, the *OCC Native Vegetation Strategy 2010-2014* acknowledges that throughout the “entire” Council area, only nine percent “(9%) of our original vegetation remains, existing as small fragmented islands of habitat in a highly modified landscape”⁵. The *OCC Native Vegetation Strategy* further recognises that more than 97% of native vegetation has been removed since settlement, and of this, 75% is coastal mangrove and samphire communities⁶. Sellicks Beach houses the rare ephemeral wetland known as the Aldinga Washpool, which has been recognised as a ‘nationally important wetland’⁷ since 2001, and is recorded in the Commonwealth Government’s *Directory of Important Wetlands*. This conservation area of Sellicks Beach is part of the Aldinga Scrub Conservation Park network on its Northern fringe. This nationally significant area, along with Coweelunga Bay (Shark Bay) to the south, are of significance to Kaurna Traditional Owners, and form part of the Tjilbruke Dreaming Trail. The *Structure Plan* recognises the need for “a full Aboriginal cultural heritage

⁴ Onkaparinga City Council *Native Vegetation Strategy 2010-2014*, p. 6

⁵ Ibid, p. 7.

⁶ Ibid, p. 2

⁷ RefCodeSA072, Australian Government Department for Agriculture, Water, and the Environment, *Directory of Important Wetlands*, available: <https://www.environment.gov.au/cgi-bin/wetlands/search.pl?smode=DOIW> . See also *The Aldinga Washpool Lagoon*, <https://www.aldingawashpool.net/>

survey...prior to any rezoning”⁸ as Sellicks Beach has not been the subject of detailed studies to date.

Furthermore, Sellicks Beach forms an important part of the McLaren Vale Character Preservation District⁹. The *Character Preservation (McLaren Vale) Act 2012* is designed to ensure that “special areas are protected from residential subdivision”¹⁰. The *Act* further aims to “protect valuable food producing rural areas” and “conserve...prized natural landscapes and tourism and environmental resources”¹¹. Plan SA notes that:

The legislation has been effective in protecting our vital food and agricultural land and in containing the threat of urban sprawl. Key to the legislation is the long-term protection afforded to these districts through a reduced ability to subdivide land for housing. The evidence shows that the legislation has reduced the number of residential land divisions in sensitive areas while maintaining an appropriate supply of land within townships¹².

The need to protect the McLaren Vale Character Preservation District was based in recognising the ‘threat of ever-increasing urban sprawl’ on food production and rural areas. Indeed, Plan SA documents state that the *Act* provides “further weight to development policy by providing statutory protection from *inappropriate urban development* (such as residential development within primary production areas or *development which is at odds with the desired character of a town*”¹³.

Plan SA, the Minister, and the Onkaparinga City Council must recognise that Sellicks Beach forms part of the Character Preservation District and should therefore be protected from inappropriate urban development. Sellicks Beach is a rural coastal village, rather than just another suburb to be urbanised. At a time in history when our actions and plans for the future are under more scrutiny and pressure to get it right than ever before, it makes no sense to pave over

⁸ OCC *Sellicks Beach Structure Plan (Draft)*, 27 October 2020, p. 27.

⁹ OCC *Sellicks Beach Structure Plan (Draft)*, 27 October 2020, p. 13.

¹⁰ Plan SA 2017, *Review of the Character Preservation (Barossa Valley) Act 2012 and Character Preservation (McLaren Vale) Act 2012*, Discussion Paper, p. 1, available: https://plan.sa.gov.au/__data/assets/pdf_file/0006/362625/Discussion_Paper_-_Character_Preservation_Acts_Review.pdf

¹¹ *Ibid.*

¹² *Ibid.*

¹³ *Ibid.*, p. 3. Emphasis added.

the last remaining open land on the Adelaide Metropolitan coastline with concrete and asphalt. We do not want to see this area go the way of Port Adelaide, West Beach, Glenelg, Brighton, Christies Beach, Moana and Seaford. We have an opportunity, with this last stretch of coastline, to set a different course and plan for the future, instead of repeating the mistakes of the past.

We and a further 350 concerned Sellicks residents oppose the proposed development because it does not preserve the coastal rural character or visual amenity of the township¹⁴.

The signatures of residents opposed to the *Plan* were collected in two weeks after the OCC announced the proposed development and circulated its *Draft Structure Plan* for public comment. It is clear that the community does not want high density urban development. The petition is ongoing until the close of the now-extended Onkaparinga Council consultation period in February 2021.

OBJECTIONS TO THE PROPOSED DEVELOPMENT

Sellicks Beach contains land that is classified as Deferred Urban, but has not yet been rezoned for residential development. Some 84 ha classified as Deferred Urban and a further 46 ha classified as Primary Production Zone are earmarked for residential development under the *Sellicks Beach Structure Plan (Draft)*¹⁵, which responds to planning imperatives identified in *The 30-Year Plan for Greater Adelaide*¹⁶. The *30 Year Plan* is overseen by the State Planning Commission and the Department of Infrastructure and Transport (DIT) and was prepared in consultation with local government¹⁷. The OCC's *Sellicks Beach Structure Plan (Draft)* proposes to rezone all undeveloped lands in Sellicks Beach, while simultaneously seeking to maintain its existing character as a seaside holiday destination¹⁸, preserve its visual amenity, and protect its cultural, heritage and environmental value. The character of Sellicks Beach is defined in the

¹⁴ Petition and accompanying submission lodged by South Sellicks Action Group to Onkaparinga City Council, 11 December 2020

¹⁵ OCC 2020, *Sellicks Beach Structure Plan (Draft)*, p. 13.

¹⁶ Plan SA, *The 30-Year Plan for Greater Adelaide*, available:

https://livingadelaide.sa.gov.au/_data/assets/pdf_file/0007/387070/FINAL_Implementation_Plan_2017_2018_-_The_30-Year_Plan_for_Greater_Adelaide_2017_Update.pdf

¹⁷ Plan SA, *The 30-Year Plan for Greater Adelaide*, p. 5.

¹⁸ Onkaparinga Council *Development Plan* Policy Area 45, p. 338, available

http://www.dpti.sa.gov.au/_data/assets/pdf_file/0008/172547/Onkaparinga_Council_Development_Plan.pdf

Onkaparinga Council Development Plan Policy Area 45 as “a settlement with coastal-rural residential character” that “caters for a small permanent and seasonal holiday population”. The *Development Plan* further notes that development must be “complementary to the coastal-rural character of Sellicks Beach”¹⁹.

We argue that the proposed allotment sizes in the *Structure Plan* will degrade the rural holiday character of the town. Most blocks in Sellicks Beach are 700m² or larger, which according to OCC, define its ‘informal’ character²⁰. However, the Plan provides for a minimum block size of 550m², which Cr McMahon acknowledges will allow for some blocks as small as 275 m² ²¹. The *Sellicks Beach Structure Plan* proposes allotments as small as 350m² to 550 m² in the Housing Choice Living and Gateway Living Areas²².

This is not “low-intensity residential development” as defined in OCC’s *Development Plan* Policy Area 45²³, which acknowledges that the coastal-rural character is achieved by “very large allotment sizes”²⁴. It is clear that the distinct rural coastal character of Sellicks Beach will be lost as a result of the plan to suburbanise the area, particularly if these small allotment sizes allow for as many as 4200 homes²⁵ to build out the very character that the *Structure Plan*--and the *Character Preservation District (McLaren Vale) Act*-- seek to protect.

The proposed development will change the character of the town from rural seaside holiday destination to highly urbanised suburb. The Plan projects a three to four-fold increase in traffic as a result of the development²⁶. The change from “rural to urban setting” is clearly incompatible

¹⁹ Ibid, p. 339.

²⁰ Onkaparinga Council July 2020, Onkaparinga City Council *Development Plan*, p. 338, available http://www.dpti.sa.gov.au/__data/assets/pdf_file/0008/172547/Onkaparinga_Council_Development_Plan.pdf

²¹ SSAG meeting with Cr Simon McMahon, 30 November 2020.

²² OCC 27 October 2020, *Sellicks Beach Structure Plan (Draft)*, p. 46.

²³ Ibid, p.338.

²⁴ Ibid, p. 338.

²⁵ The figure of 4200 homes was raised by the Senior Policy Planning Officer, Alison Hancock, at the *Conversation with Council*, hosted by Sellicks Area Residents Association on 5 June 2019. This figure was based on allotment sizes of 325 m²

²⁶ The Onkaparinga City Council *Sellicks Beach Structure Plan: Issues and Opportunities Paper* states: “Sellicks Beach Road would have a three to fourfold increase in traffic volume reflective of a change from a rural to an urban setting” p. 20. Available: <https://yoursay.onkaparinga.sa.gov.au/60449/widgets/305912/documents/186677>

with the desire to maintain the town’s rural coastal character as identified in the *Structure Plan* and accompanying documents. Further, we argue that Sellicks Beach cannot sustain 4200 houses and associated roads, sewage, and infrastructure. Indeed, the plan to develop the area creates new problems on top of existing ones. A key problem is the lack of adequate wastewater disposal in Sellicks Beach, as identified in OCC’s *Structure Plan* and accompanying documents.

The OCC *Development Plan* notes that Sellicks Beach “does not have access to mains sewer. Accordingly, ***development will not be undertaken if it is likely, in itself or in association with other development, to create potential demand for such services***”²⁷. The *Structure Plan* and accompanying documents note that the provision of sewerage and mains wastewater will be necessary to service the development:

The key to unlocking the sustainable development potential of Sellicks Beach is to resolve the investment, implementation and delivery of mains wastewater to both undeveloped and already developed parts of Sellicks Beach²⁸.

This clearly conflicts with the policy intent outlined in OCC’s *Development Plan*. In addition, we note that unwanted high density development should not be the price that a community has to pay to receive an essential service. Appropriate mains wastewater provision should not be tied to development. This is inequitable as other areas within the OCC municipality are provided with adequate mains wastewater disposal systems. The plan creates economic costs for infrastructure provision that it sets out to solve by requiring the Sellicks community to accept inappropriate and unwanted development.

ECONOMIC PROBLEMS WITH SELLICKS BEACH STRUCTURE PLAN

The plan to turn 130 ha from vacant land to residential development creating up to 4200 new homes where there are currently only 1300 houses creates many problems, particularly as much of the infrastructure of Sellicks Beach is already at capacity and not all essential services are provided. The OCC *Sellicks Beach Structure Plan Issues and Opportunities Report*²⁹ already identifies several problems associated with the implementation of the proposed development:

²⁷ Onkaparinga Council *Development Plan*, p. 337. Emphasis ours.

²⁸ OCC 27 October 2020, *Sellicks Beach Structure Plan (Draft)*, p. 48

²⁹ OCC SBSP [Issues and Opportunities](#) 2020

- **An electricity upgrade** will be required, as only 200 homes can be added to Sellicks Beach without a substation being built at Maslins Beach.
- **Sewerage** Sellicks Beach currently has no mains sewage system and the report identifies ‘technical’ and ‘functional’ problems with on-site disposal systems. Some homes are on Council managed WWMS. The proposal for development contradicts the OCC *Development Plan* which says development should not proceed if it creates an extra demand for sewerage services.
- **Natural gas is not able to be connected** according to the OCC *Sellicks Beach Structure Plan: Issues and Opportunities Report*. Gas is still a fossil fuel and needs to be phased out anyway.
- **Stormwater runoff and flooding mitigation will be required.** This represents not only a risk to residents downhill from the proposed development, but also a financial and insurance risk to the council.
- **Road upgrades will be required** to allow for the projected three to four-fold increase in traffic.

It makes no sense to have to have to solve these problems when there is no need to create them in the first place, particularly when it is clear that the Sellicks community does not want its rural coastal community converted to a highly urbanised suburb.

We also contend that *The Greater Adelaide Development Plan* and the resultant OCC *Development Plan* and *Sellicks Beach Structure Plan* rely on outdated population projections. Indeed, the ABS forecasts very low population growth for Adelaide:

South Australia's growth is projected to be driven by growth in Adelaide. Adelaide is projected to increase from:

- 77% of the state's population in 2017 to 80% by 2042
- 1.3 million people in 2017 to between 1.4 million and 1.5 million by 2027

The rest of South Australia is projected to have very low growth, with an increase from 389,500 people in 2017 to between 389,900 and 406,900 people in 2027³⁰.

Accordingly, there is no reason to add an extra 1500 to 4200 homes to this area. Finally, we contend that the *Structure Plan* does not adequately consider the ways that the proposed residential development will degrade the fragile coastal environment and the stunning coastline

³⁰ ABS, Population Projections Australia, available: <https://www.abs.gov.au/statistics/people/population/population-projections-australia/latest-release#south-australia>

that attracts local, national and international tourists to Sellicks Beach. **Therefore, for all the reasons outlined above, we strongly urge both the Onkaparinga Council and the Minister for Planning, Transport and Infrastructure to immediately stop the inappropriate and unwanted sub/urbanisation of Sellicks Beach and to consider instead a proposal to conserve the area by creating a model climate-ready community.**

THE NEED FOR CLIMATE-FORWARD THINKING: THE SELLICKS-ALDINGA CONSERVATION PARK

Given that planning authorities have the capacity to engage in ‘exemplar projects’ in partnership with state and local governments and key stakeholders to create ‘innovative’ projects and deliver ‘walkable, healthy neighbourhoods’³¹, we contend that the Minister and the State Government should act immediately to protect and conserve the area by engaging in an ‘exemplar’ project that will create a sustainable and climate-ready community. Drawing on the support of local residents and Sellicks Beach community leaders, as well as evidence from leading scientists and politicians, we propose an alternative use for the land that recognises the unique character of Sellicks Beach, restores our natural environment, and addresses the imperative to prepare our communities for a changing climate.

Our proposal is to create the Aldinga-Willunga-Sellicks Conservation Park. The park would be a continuous conservation zone from the Aldinga Scrub Conservation Park, through the proposed Aldinga Washpool Conservation Park and up to a restored grassy woodland, that would have once overlooked Sellicks Beach before it was cleared. Our vision is that the Conservation Park could eventually extend along the Fleurieu Coast to Cape Jervis to preserve the Fleurieu coastline. The establishment of the Aldinga-Willunga-Sellicks Conservation Park would create a unique conservation park that would cover three significantly different vegetation communities and their transitional zones. The park will keep the neighbouring suburbs cooler, protect and restore the biodiversity of the wider Willunga Basin, create tourism opportunities in the area, and maintain the residents’ quality of life. The Sellicks Beach Woodlands section of the park will be restored on the lands currently proposed for urban development in the *Sellicks Beach Structure Plan* including the primary production and deferred urban zones.

³¹ OCC 27 October 2020, *Sellicks Beach Structure Plan (Draft)*, p. 5.

The Onkaparinga Council's *Development Plan* already provides for Conservation Zones to protect the Washpool:

1. A policy area in which the Aldinga Scrub Conservation Park and the Washpool, inclusive of areas of natural vegetation, wildlife habitat, and sites containing features of significance to the earth sciences, are retained in their natural state for conservation, education purposes and limited passive recreation.
2. To preserve the extent and nature of natural and Aboriginal Heritage of the Aldinga Scrub Conservation Park, the Washpool and surrounding area and to ensure that development is in keeping with that cultural significance.
3. The development of public land in appropriate locations for limited passive recreation, education and conservation purposes with an emphasis on retaining and rehabilitating the natural landscape and establishing wide landscape buffers around the perimeter of suitable areas.
4. ***The extension of open space passive recreation reserves through land purchases, contributions of open space, and exchanges of land***³².

We therefore argue that the State Government in partnership with Onkaparinga City Council should immediately purchase the lands at Sellicks Beach earmarked for 'business as usual' residential development to instead create a sustainable, climate-ready, model community. If there must be some development, we recommend the building of a small short-stay holiday park, an interpretive and cultural heritage centre, and a series of nature trails³³. A solar farm and community battery to service the electricity needs of the community should also be considered.

The proposal to restore the Sellicks Woodlands focuses on what is needed by current residents and for the future, without the need for massive infrastructure spending and disturbance, or the loss of quality of life for the community.

Spending can be targeted to provide needed essential infrastructure:

- Upgrading to mains sewer for the current community. Provision of mains sewerage is a human right and should not be conditional on development.
- Targeted road safety and beach carpark and amenity upgrades
- Appropriate development tied to local need for a medical centre

³² OCC *Development Plan* Aldinga Sellicks Conservation Policy Area 6, p. 160. Emphasis ours.

³³ For example, Victor Harbor has an eco-development that could provide a model for OCC: see Beyond Today: <https://www.beyondtoday.com.au/wetlands.htm>

- The provision of a Cultural and Nature Education Centre and walking trails

There is also potential to develop Sellicks beach as an example of a community using renewable energy technology to ensure the provision of electricity in the future.

In the future, costs associated with the maintenance of Sellicks Beach and costs associated with adapting to climate change will be reduced by taking action to adapt now to protect Sellicks Beach. Residents will benefit from reduced energy costs from living in a cooler suburb and potentially from the provision of cheap renewable energy. Residents will also benefit from less exposure to risk from heat related illnesses and better mental health, leading to savings on public health costs for the wider region.

The creation of a Conservation park at this location provides a great opportunity to add to the region's tourism industry. Walking trails, spectacular scenery and the proximity of other great tourism destinations will make the Aldinga-Sellicks Conservation Park a must visit destination for tourists. The establishment of a Cultural Centre to recognise and teach about the cultural significance of the area will add to this.

BENEFIT TO AGRICULTURE

Restoring the Sellicks Woodlands will benefit our local farmers through protecting ecosystem services and building resilience in our local agricultural industry for the future. With the prediction that we have lost 80 percent of insects globally in the last 50 years³⁴, and with birds in similar declines³⁵, we must protect what is left if they are to continue to provide the ecosystem services we need. The Food and Agriculture Organisation of the UN described the problem facing agriculture in its 2019 report *The State of the World's Biodiversity for Food and Agriculture*:

...the biodiversity that underpins our food systems is disappearing – putting the future of our food, livelihoods, health and environment under severe threat. Once lost...all the

³⁴WWF 2020 [Living Planet Report 2020](#)

³⁵ Birdlife Australia [State of Australia's Birds 2009](#) 2010 D Paton J O'Connor

species that support our food systems and sustain the people who grow and/or provide our food – cannot be recovered.³⁶

Farmers from the largest vineyard to the smallest backyard garden in the Willunga Basin will benefit from the restoration of the Sellicks Woodlands and the ecosystem services it will provide to the wider region. By protecting biodiversity, we will ensure our community is resilient and better prepared for the future. The most obvious benefit to farmers is the protection of pollination services. Pollinators are essential to 35 percent of the world’s food crops, and 75 percent of crops that produce seeds or fruit for human consumption benefit from and depend on pollinators to some degree³⁷.

ADDRESSING BIODIVERSITY LOSS

The evidence for species loss and the threat posed by ecosystem collapse is overwhelming. The loss of biodiversity is an existential threat as dangerous as climate change, and is an unacceptable risk to human and ecosystem health³⁸. The major drivers for biodiversity loss currently are habitat loss, exploitation and environmental degradation³⁹. Climate change will make things worse, and threatens our “economies, livelihoods, food security, health and quality of life”⁴⁰. In Australia, environmental matters are of concern. According to the World Wildlife Fund, some populations in Australia have dropped by 97% since 1970, and since colonisation, Australia has one of the highest rates in the world for animal extinctions⁴¹.

Here in South Australia, in 2017, the Environment, Resources and Development Committee of the South Australian Parliament Report into Biodiversity stated in its Executive Summary:

The Committee found that in spite of the efforts of the State and Federal governments, industry and private landholders in South Australia, the condition of biodiversity in the

³⁶ Food and Agriculture Organisation of the United Nations, Feb 2019, [The biodiversity that is crucial for our food and agriculture is disappearing by the day](#) Rome. (Full Report)

³⁷ World Economic Forum: Food security. [75% of crops depend on pollinators - they must be protected](#) 9 Dec 2019; see also Rebecca Peisley. 2017 [The Benefits and Costs of Bird Activity in Agroecosystems](#). Charles Sturt University.

³⁸ [Stop biodiversity loss or we could face our own extinction, warns UN](#), *The Guardian*, Nov 2017

³⁹ Mawell et al. 2016, [The Ravages of guns, nets and bulldozers](#). *Nature*.

⁴⁰ [UN IPBES Report Announcement](#). 6 May 2019, available:

<https://www.un.org/sustainabledevelopment/blog/2019/05/nature-decline-unprecedented-report/>

⁴¹ WWF 2018 Living Planet Report 2018 ; WWF 2018 Living Planet Report 2018

State continues to decline. Species extinctions have occurred in the past and a further “extinction debt” still exists. There is no reason to believe that this trend will improve without a change to the way we approach biodiversity conservation.⁴²

Protecting what remains is not enough, and it is estimated that to secure existing populations, a coverage of around 30% native vegetation is required. The *OCC Native Vegetation Strategy* states that there is only 9% of original vegetation cover left in OCC, and that the council has a goal to increase indigenous vegetation cover to greater than 30 percent of the landscape, with a focus on restoring disproportionately cleared grassy woodlands⁴³. Rezoning the Primary Agricultural and Deferred Urban zones as ‘Conservation’ as an extension of the Aldinga Scrub and Aldinga Washpool Conservation Parks, and restoring the habitat to a grassy woodland, will be a great contribution to OCC’s stated target to ensure approximately 30 percent coverage of the greater landscape comprises indigenous vegetation and its goal of conserving biodiversity in this region.

Land clearance occurred disproportionately as the easiest accessible and most productive land was cleared first. As a result, grassy woodlands are now the most endangered vegetation communities in Australia. The land to be restored would be one of these grassy woodlands. There is some evidence to say that this area should be protected as an ecosystem of national significance. A survey of the history and cultural values of the Aldinga Sellick Beach Scrub in 1973 by the Nature Conservation Society of South Australia says that prior to European colonisation, Peppermint Gums grew in large numbers spreading out from the scrub across the Willunga Plains⁴⁴. Peppermint Box (*Eucalyptus odorata*) Grassy Woodlands are one of eleven ecological communities in South Australia listed as nationally threatened under the *Environment Protection and Biodiversity Conservation Act 1999*^{45,46}:

⁴² South Australian Parliament - Environment, Resources and Development Committee, 2017. *Biodiversity*, Adelaide: South Australian Parliament. Report can be found at <https://www.parliament.sa.gov.au/en/Committees/Committees-Detail> (Report 78)

⁴³ OCC *Native Vegetation Strategy* 2016 p.55,.

⁴⁴ Nature Conservation Society 1973, *A Survey of the Historical and Cultural Features of the Aldinga Sellick Beach Scrub*, available: From photocopy of original, printed by the Department of Further Education 1973

⁴⁵ SA Department of Environment and Water year *Threatened Ecological Communities in South Australia*

⁴⁶ Australian Government *Approved Conservation Advice for Peppermint Box (Eucalyptus odorata) Grassy Woodland of South Australia* 2008

By restoring the grassy woodlands within the Sellicks Beach, rather than repeating the mistakes of the past, we will be contributing to preserving biodiversity in the area and the ecosystems we rely on. In doing so, we will not only help restore our environment, but we will make our community more resilient and more prepared for the problems associated with climate change.

ADDRESSING CLIMATE CHANGE

The Bureau of Meteorology recorded 2019 as the hottest year on record, and 2010-2019 the hottest decade ever for Australia. In the same report, ‘State of the Climate 2020’, the BOM states that this decade will also be the coolest for the rest of the century⁴⁷. The International Panel on Climate Change has warned that even if all countries adopt zero emissions targets, the world will likely exceed the 2°C target to minimise the effects of global warming⁴⁸. The following graph shows warming projections based on different policy settings⁴⁹:

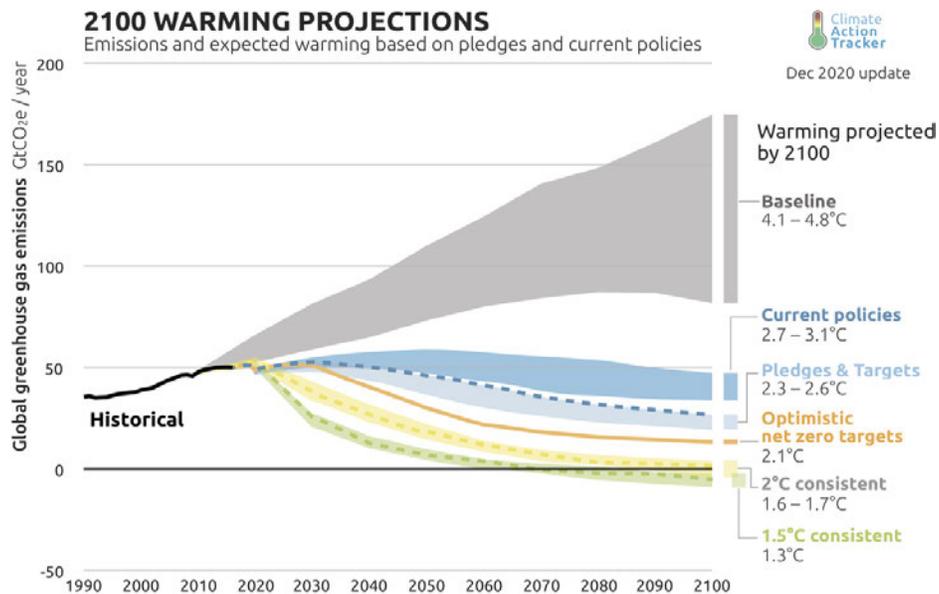


Figure 1 Different warming projections based on the outcome of government pledges and policies.

⁴⁷ Bureau of Meteorology (BOM) [The State of the Climate 2020](#)

⁴⁸ Intergovernmental Panel on Climate Change (IPCC) 2018, [Global Warming of 1.5°C](#)

⁴⁹ Graph from [Climate Action tracker website](#), a collaborative effort between The New Climate Institute and Climate Analytics.

While much of the discussion on how to deal with the climate crisis is around the environment and economics, the biggest threat to communities is actually the health risks associated with a warming planet⁵⁰.

Climate change poses risks to health through increased risk of heat related health issues, increased pollution-related illnesses, and mental health issues. There is also the risk to the lives of people through extreme weather events such as the Black Summer bushfires and the Millennium Drought, and to our food and water security⁵¹. In recognition of this, all levels of government have acknowledged the need to plan for a changing climate and have policies and initiatives in place to help prepare our communities. We have a responsibility to prioritise these initiatives in the *Greater Adelaide Development Plan*. OCC's Structure Plan for Sellicks Beach does not incorporate these policies adequately and contradicts many of the climate policies of both the State Government⁵² and OCC⁵³.

By being innovative and climate-forward, both the State Government and the Onkaparinga Council have the opportunity to act to restore the Sellicks area to grassy woodlands and thus deliver many benefits to mitigate the climate crisis for both the wider region and for Sellicks residents. Biodiverse grassy woodland ecosystems are recognised as effective carbon sinks capturing tonnes of carbon annually⁵⁴ and will help OCC move towards net zero emissions.

The community of Sellicks Beach will benefit from the cooling effect of the trees, reduced pollution and dust exposure from the quarry, and most importantly, reduced risk of heat related health problems associated with urban heat in the future, which is recognised as a significant health issue. It makes no sense to pave over the last open section of our coastline and create problems that every council is making plans to mitigate⁵⁵. A restored grassy woodland will also

⁵⁰ Dr Kate Wylie [Climate Medicine](#) 2020. Climate Medicine is an Adelaide based organisation raising community and organisational awareness on the health risks connected to climate change.

⁵¹ World Health Organisation (WHO) 2018, [Climate Change and Health](#); see also Center for Disease Control and Prevention (CDC) 2020, [Climate Effects on Health](#)

⁵² State Government 2018 [Towards a Resilient State](#)

⁵³ OCC 2019, [Climate Ready Onkaparinga](#)

⁵⁴ Government of South Australia [Guide to Carbon Planting in South Australia](#) 2017

⁵⁵ Onkaparinga Council's [Environment](#) 2016 policy states: "... an analysis of surface temperature in February 2016 has found that the hottest areas in our urban district included dry/dead grass and vegetation, exposed soil and unshaded hard surfaces. Open space has an important role in creating or alleviating heat islands and this has implications for tree cover and use of irrigation

make our agricultural industry and backyard gardens more resilient to the problems of the future through the protection of wildlife, in particular the insects and birds which pollinate our crops.

Restoring the woodlands could also solve another significant issue raised in the *Structure Plan*: the potential stormwater runoff from the proposed development which could cause flooding for current residents downhill, and also negatively impact the Aldinga Washpool Lagoon and associated wetlands⁵⁶. As discussed above, stormwater runoff poses a financial and insurance risk to Council. Weather events are also expected to become more frequent and more intense as climate change takes effect. The benefits of a restored woodlands would be to slow and absorb stormwater, reduce flood risk, and allow for the rehabilitation of remnant watercourses further securing water for the environment and for us in the future.

CONCLUSION

In conclusion, the current *Sellicks Beach Structure Plan (Draft)*, in response to the *Greater Adelaide Strategic 30 Year Plan*, is a plan that creates a number of significant problems for no benefit. There is no reason to add an extra 1500 to 4200 homes to this small seaside village. Additionally, the plan also fails to prepare for the future by ignoring the two existential crises that are facing humanity at the moment: the climate crisis and biodiversity loss.

SWAG's proposal to rezone the area as 'Conservation' and restore the Sellicks Woodlands provides Governments at both local and State levels an opportunity to create a climate-ready sustainable community and demonstrate its climate credentials to Australia and the world by doing so. The proposal addresses the health problems that will be associated with climate change and offers a major contribution to protecting biodiversity in the area. The creation of the Conservation Park will protect and restore the Tjilbruke Dreaming Trail which is of significant cultural importance to the Kurna Nation and will enhance the quality of life of current residents.

Our plan has the support of the community and local businesses.

⁵⁶ OCC *Sellicks Beach Structure Plan: Issues and Opportunities Paper*, 2020