

West Lakes Residential and Mixed Use Draft Code Amendment

Written Submissions Received

Wednesday 28 September - Thursday 24 November 2022

### List of Written Submissions Received

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7.	Rick Chenoweth City of Prospect
8.	Rob Snowdon
9.	Colin Umpherston
10.	Lynda Smith
11.	Sue Curran Manager Strategy and Business City of West Torrens
12.	Stacey Terrell
13.	Larry Finis
14.	Emmil Priebe
15.	Veronica Maidment
16.	Roger and Gail Rowe
17.	Brenton Maidment
18.	Kym Withey
19.	Lorraine Hammond
20.	Joshua Bryant
21.	Gabrielle Bryant
22.	Dylan Bryant
23.	Mark Worthley
24.	Claudia Worthley
25.	Zak Worthley
26.	James Lucas
27.	Peter Searle
28.	Estelle Lucas
29.	Julien Lucas
30.	Lauren Malec
31.	Jean Woodley
32.	Daryl Cocks
33.	Helen Surplice
34.	Robert Surplice
35.	Courtney Hammond
36.	Kerri Huckel
37.	Rachel Egel
38.	Dieter Kletschkus
39.	Ashley Johnson
40.	Monica Szczepanowski
41.	Chris Szczepanowski
42.	Shaun Turnbull
43.	Shaun Turnbull
44.	Allison Bampton
45.	Ky Bampton
46.	Zoe Bampton
47.	Todd Bampton
48.	Christine Kletschkus
49.	Patricia Curry
50.	Michael Wooten
51.	Julie Withey

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53.	Siena Withey
54.	Claudia Withey
55.	Mandy Miller
56.	Dieter Kletschkus
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58.	Steve Hooper City of Port Adelaide Enfield
59.	Anna Debono
60.	Tom McCready Acting Chief Executive Officer City of Adelaide
61.	Mathew Maidment
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64.	John Stallard
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68.	Andrew Valenta
69.	Lucas Valenta
70.	Gail Stallard
71.	John Kurda
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73.	Kerri Huckel
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81.	Kevin M Fox
82.	Margaret D Fox
83.	Kim Teder
84.	Nathan Teder
85.	Jenine Tracey
86.	Michael Teder
87.	John L Cooper Coopers Accessible Vehicles Pty Ltd
88.	Helen E Cooper
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90.	Joanna Wells Outreach Coordinator Conservation Council SA
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92.	Daniel Metcalfe
93.	Cherie Robertson
94.	Savannah Little
95.	Lane Landreth
96.	Shelley Travers
97.	Nina Travers
98.	Darryl and Judy Tozer
99.	Robyn Suzanne Welsh
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103.	Paul Sperling
104.	Judy Sperling
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106.	Judy Sperling
107.	Trevor Brewer
108.	Jim Baldacchino
109.	Brenton Holmsted
110.	Helen Holmsted
111.	Edward King
112.	Robert Williams
113.	Maxine Williams
114.	Susan Prettejohn
115.	Peter South
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117.	Scott Daniells
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119.	Kai Rohmert
120.	Ron Baker
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122.	Gary Dohnt
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138.	Mrs Dionne Robertson
139.	Ann-marie Bryant
140.	Andrew Zammit
141.	Jamie Guerra Leedwell
142.	Isabella Okulewicz
143.	Jacky Semler
144.	Russell Davey
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146.	Anne Dohnt
147.	Con Kikianis
148.	Jennifer Townsend
149.	Bruce Henshall
150.	Richard Billis
151.	Riley Price
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156.	Trevor and Carolyn Harding
157.	Julien Maddem
158.	Lisa Chan
159.	John Kong
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163.	Sandra Grant
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165.	Peter Dinan Freedom Fitness
166.	Luke Fearne
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168.	Mickey Chan
169.	Chris Vounasis Future Urban On behalf of: Duxton Capital (Australia) Pty Ltd
170.	Chantelle Bartlett
171.	Ian Westwood
172.	Heather Sawyer
173.	Paul Chalubek
174.	Lila Chalubek
175.	James Chalubek
176.	Marilyn Chalubek
177.	Alexandra Chalubek
178.	Ryan Piekarski
179.	Silvio I
180.	Jacqui Priestley
181.	Stephen Mullighan MP Member for Lee
182.	Paul Sykes
183.	L.C and J.A Barnes
184.	Scott Douglas Environment Protection Authority
185.	Alex Ward Department for Environment and Water
186.	Pat Gerace Chief Executive UDIA
187.	John Hunter
188.	Sue Hunter
189.	Meredith Huxley
190.	Marlene Timms
191.	Mary Firth
192.	Daryl Ireland
193.	Matt Minagall SA Water

Submission 129

# **West Lakes Residential Mixed Use Draft Code Amendment**

**SA Water Code Amendment Community Resident's Group  
(SWCACRG)**

**Charles Sturt Council Submission**

19 November 2022

Niina Marni is Kurna for ' Welcome'

We acknowledge and pay respect to the traditional custodians of the  
land, the Kurna people of the Adelaide plains.

We pay our respect to Elders past, present and emerging.

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## **EXECUTIVE SUMMARY**

As a result of the proposed sale of the SA Water Treatment Plant on Frederick Road, West Lakes, residents met with SA Water on three occasions between 2015-2016.

The purpose of the meetings was to establish what the local community wanted to see at the site when it was sold.

The community developed 4 main Amenity Assessment Criteria that SA Water indicated were going to be included in the contract with the eventual purchaser.

The criteria were subsequently not included in the contractual arrangements with the purchaser, Potentia West Lakes Ltd (referred from here as the developer).

In 2022, Charles Sturt Council advised the affected community of a proposed Code Amendment, concerned residents informally met and formed a Leadership Team to represent them. The Group was later formalised with a Charter on 26 August 2022 and became the SA Water Code Amendment Community Resident's Group (SAWCACRG).

The Leadership Team communicated with residents by way of letter-box flyers, email, and the development of a Facebook site. Residents met at a Community meeting on 13 October 2022 and were encouraged to individually provide submissions to Council during the consultation period. It was further agreed that a submission be made by the Leadership Team on behalf of the community.

The Leadership Team have made deputations to the City Services Committee and the full Council and wish to make further deputations after the 2022 Council election. Additionally they have met twice during the community engagement period with Council and the developer.

The community agreed that the preferred code amendment zoning for the site should be the Waterfront Neighbourhood Zone.

The Leadership Team wish to make a verbal presentation in relation to this submission in February 2023.

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## **OVERVIEW**

This submission consists of information compiled from speaking with members of the community and research undertaken. It is not written as a Planning document but as a community response to the Charles Sturt Council's request for feedback to the Code Amendment proposal.

This submission considers that the community's proposals comply with all relevant planning codes and policies.

It expands further than just identifying a 'Zone' to apply and details outcomes that should be included into policy to overlay the development site:

- Council's 2014 Strategic Assessment of the Development Site
- Not a Urban Renewal Neighbourhood Zone
- EPA Contamination Audit
- Sports-field, Playground & Water Feature
- Development within the SA Water odour modelling zone
- Soil Remediation
- Community's Preferred Code Amendment Zone
- Technical and Numerical Variations
- Future Land Purchase From SA Water
- Open Space
- Heritage Recognition
- Fauna Assessment and a Habitat Reserve for Vulnerable Cockatoos
- Flora Management
- Buffer-Zones around the site Boundary
- Traffic Management
- Council Notifications Of The Proposed Code Amendment

18 'Outcomes' have been identified for Council's attention.

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## **SUBMISSION**

### **Land Subject To Code Amendment Proposal**

The Charles Sturt Council has asked the community to comment on a proposed development at Lot 100 and Lot 101 Frederick Road, West Lakes, SA, 5021 (the former SA Water Waste Treatment Site).

The privately funded code amendment has been proposed by the developer.

The site (or Affected Area) is contained within the red and black outlines below:



The red outline indicates the site for which the developer has a contractual arrangement with SA Water. SA Water still own this land.

The black outline indicates land SA Water currently own. The developer has advised they are in negotiations with SA Water to purchase a portion of this land to essentially act as a 50 metre buffer between the SA Water site and any potential development.

Both parcels of land are currently recorded as Infrastructure Zones.

The developer has proposed the (red outline) site Lot 100 Frederick Road, be amended from its current Infrastructure Zone to Urban Renewal Neighbourhood (Residential) and Mixed-use Zone.

The proposal seeks to build 560 dwellings (up to 5 storeys) for about 1,300 people.

The existing SA Water site at Lot 101 Frederick Road (black outline) would remain as an Infrastructure Zone (minus any land that the developer may purchase from SA Water). In this case that land would also be Urban Renewal Neighbourhood (Residential) Zone.

Charles Sturt Council has asked for submissions to be made before November 24, 2022.

### **Background to the SA Water Treatment Plant**

The SA Water Treatment site was built in the 1930's. It was originally a sewage plant and used outside ponds at times to discharge sewage products into.

As a result of this practice a number of contaminates entered the land and water-table.

During the development of West Lakes in the late 1960's to 1970's, these ponds were subject to earth works and much of the contaminates were spread around the surrounding community.

The site later processed sewage product and in about 2004 SA Water built a pump station alongside the main processing area. This addition effectively pumped sewage product in underground pipes to the SA Water Bolivar site.

As a result, the main processing site became redundant and SA Water sought to sell the land.

In 2015 SA Water consulted the community to ascertain what they would like to see at the site should it be later developed.

A community engagement process began consisting of local residents who developed 4 main Amenity Assessment Criteria:

- Existing Buffer-zones,
- Maintenance of the site,
- Traffic Management, and
- EPA Standards (Noise and Air Pollution).

The community were led to believe the criteria would form 25% of the evaluation process for the new purchaser. However, in 2022, as a result of Charles Sturt Council documentation sent to local residents concerning a proposed code amendment, it was ascertained that in fact SA Water did not include any of the criteria in contractual arrangements with the developer.

Local residents were extremely disappointed and felt let-down when SA Water did not use the criteria and disappointed that the entire community engagement process of consultation was for nothing.

As will be included further in this submission, the community still have the same expectations for a proposed development as they did during the SA Water consultation.

### **Formation of the SAWCACR Group**

Since the announcement of the successful tender for the SA Water site (Potentia) local residents met and decided they needed to establish a Leadership Team that would seek wider community engagement.

The initial meeting re-affirmed the Criteria developed through the SA Water consultation were still valid.

The Leadership Team subsequently made a deputation to the City Services Committee on 15 August 2022. The deputation essentially outlined the previous SA Water consultation process and what the Group's expectations were:

- Building heights be limited in height to fit in with the existing neighbourhood.
- Increased traffic does not enter existing neighbourhood streets (e.g. Lochside Drive / Mariners Crescent).
- Buffer-zones are maintained to adjacent residential properties.
- A Heritage Impact Assessment is undertaken of the existing site.
- Sufficient Open-Space and Urban Tree Canopy assessments are made and implemented.
- A cultural and historic walking trail could be implemented along the Western boundary of the development site that links with the existing Port Adelaide / Enfield Council Kaurua Walking Trail and Cultural Centre currently under construction.

The Committee was asked 22 questions that were identified as anomalies and inaccuracies in the developer's documents as released on 11 August 2022.

The Group subsequently developed a Charter. Its Vision is:

*The community want to work with Council and Potentia West Lakes to deliver a new and vibrant community that recognises Aboriginal culture and historic sites, that maintains adjoining 'green' spaces and one that increases existing community appeal.*

The Group has expanded as a result of letter-boxing, placement of signage in the community and development of a Facebook page.

A community meeting of approximately 100 residents was held at St. Bedes Hall, Semaphore on 13 October 2022.

The community's local Member of Parliament (Electorate of Lee) is Stephen Mullighan. The Leadership Team have met with him and obtained his support of their broad aims. He also attended and spoke at the community meeting.

The Leadership Team has consulted with various organisations and groups to gather information for this submission.

The Leadership Team also made a deputation to the full Council on 24 October 2022 where they re-affirmed their broad expectations and stated the correct re-zoning for the site should be **Waterfront Neighbourhood Zone**.

## Council's Previous Assessment of the Development Site

To ensure Charles Sturt Council could assist in meeting the SA Government's 30-Year Plan For Greater Adelaide (2010), they assessed numerous sites within their region to gauge where additional housing could be developed.

The Council's April 2014 Strategic Assessment Report – Development Plan Review identified the SA Water site as a potential area that may be subject to development.

The report assessed the potential dwelling yields for the site as depicted below:

**Table 5 – Current and Potential Development site yields**

Identified Development Site/Area (A)	Possible Yield (B)	Status	Development / Supply Timeframe	Comments
SA Water site – West Lakes	96 dwellings <sup>b</sup> (210 people)	Indicative Council yield analysis only. Future investigations required.	Unknown	Former waste water treatment site adjacent Frederick Road, West Lakes

The report identified that the site would result in 96 dwellings with approximately 210 people.

It is noted that there is a disparity between the assessment in the Council's report and the developer's proposal:

	Council	Developer
Dwellings	96	560
Residents	210	1,300

The question is rightly asked, '*Why is there a disparity?*'

Council was aware back in 2010 what future housing demands were and assessed the site based on the surrounding Neighbourhood Zone.

This zone essentially allowed for 1 and 2 storey buildings to be built on larger blocks of land.

The developer assessed the site to have up to 5 storey buildings on smaller blocks of land, which in turn allows for a greater profit to be made.

Council were correct in their assessment and the community is fully supportive of it.

**OUTCOME 1:**

Charles Sturt Council acknowledges the findings of the 2014 Strategic Assessment Report.

## **Faults with the Urban Renewal Neighbourhood Zone**

The community have unanimously declined to support the proposed code amendment zone and Concept Plan to be applied at the development site.

There are many reasons for this decision, these will be further discussed in this submission, however some of them are summarised below:

- Up to 5 storey buildings do not fit into the neighbourhood,
- The zone will change the character of the neighbourhood,
- The zone is different to the zone the Council assessed for the site in 2014,
- Due to ground fill to be imported and Technical and Numerical Variations (TNVs) that allow higher builds, the 5 storey's will look more like 7 storeys,
- The surrounding neighbourhood is zoned as low density whilst this zone includes medium density housing,
- The EPA audit was undertaken based on low density housing not medium density housing as proposed,
- There is no community sports field proposed in the Concept Plan,
- The proposal seeks to remove Significant / Regulated & Exempt trees,
- The proposal does not fully comply with the Council's Urban Tree Canopy Plan,
- There has been no Special Value Tree assessment conducted with the proposal,
- The removal of all trees will destroy the habitat for Vulnerable listed Yellow-Tail Black Cockatoos,
- Water, gas and electricity capacity reports/assessments may not be sufficient for the number of people planned to live at the development site,
- There is no public transport that passes the development site,
- The proposal will result in traffic congestion along a planned road junction with Lochside Drive,
- The proposal will likely result in cars being parked on the Western end of Lochside Drive as a result of at least 12 houses planned for the street, further congesting and restricting traffic flow on this local collector road,
- The development site is outside the 800 metre Major Transport Corridor that is the general policy principle for application of this zone,
- The development site is outside the 400 metre Major Road Corridor that is the general policy principle for application of this zone,

- The Concept Plan can and is likely to change from what has been presented to Council and the community and there is uncertainty as to what the development will eventually look like,
- The site was not identified by the Council's Residential Growth & Character Study Report (2011) for potential growth areas around Major Transport Corridors, Railway Stations and Activity Centres,
- The Concept Plan does not include any Buffer-Zones for residents on the development boundaries,
- Residents in 3 and 4 storey buildings within the proposed site will be subject to odours emanating from the existing SA Water bio-filter stack when normal operations are interrupted,
- The proposal allows for a dangerous Retainer Wall Plan,
- The proposal allows for a Retainer Wall Plan that will raise the development site ground heights enabling new residents to build houses higher than adjoining neighbouring houses,
- The most recent Allotment Plan as available, has some neighbouring residents to the site having 4 and 5 rear neighbours ,
- The most recent Allotment Plan as available, depicts some allotments within the development site will have an astonishing 10 neighbours, and
- There are misrepresentative issues in supplied documents used to justify this zone

**OUTCOME 2:**

Any proposed development at 100 and 101 Frederick Road, West Lakes, SA, 5021 does not involve the Urban Renewal Neighbourhood Zone.



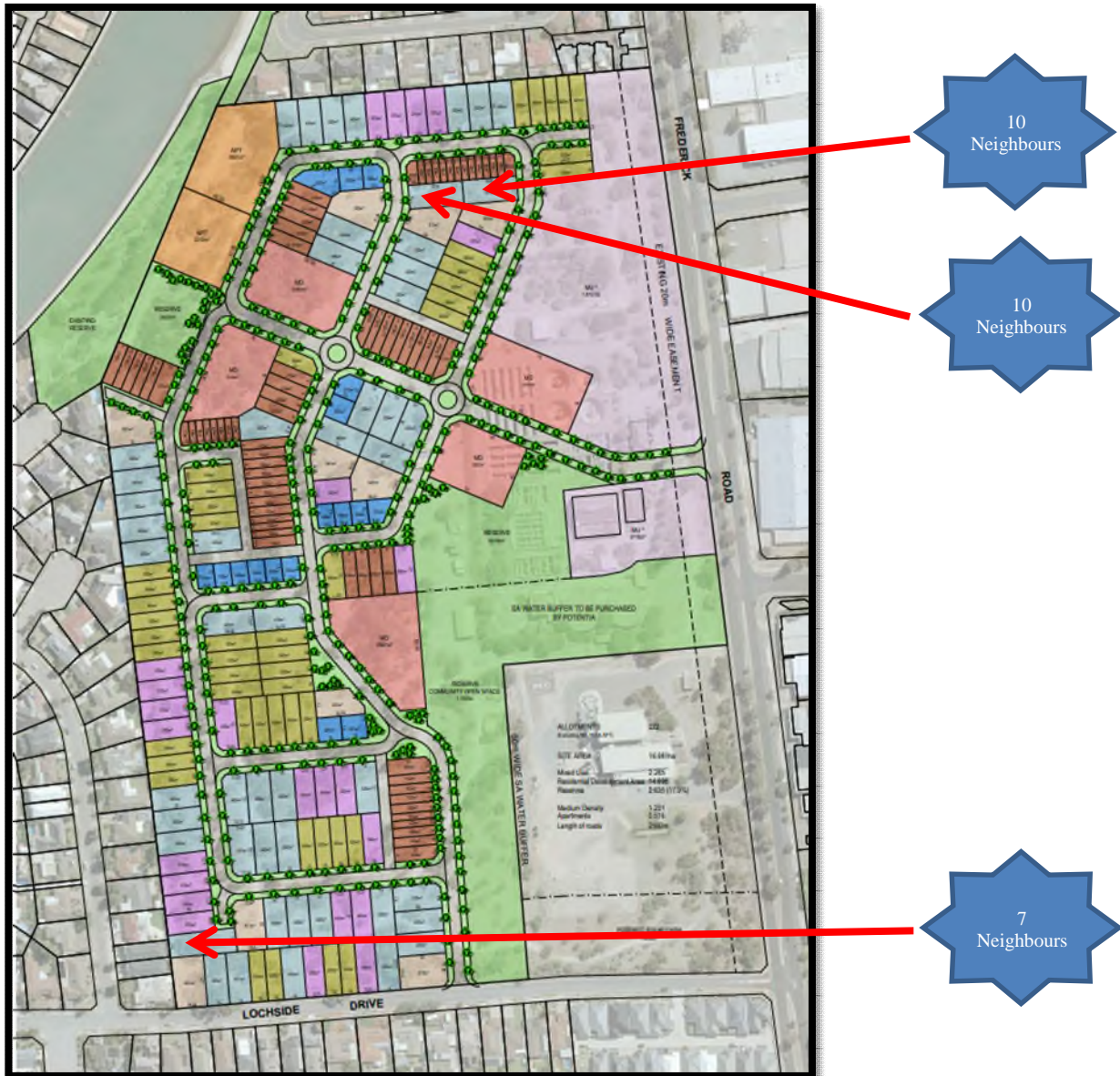
## Unacceptable Number Of Neighbours

The most recent allotment plan available to residents depicts an unacceptable number of neighbours that will be developed to both existing adjoining residents and those within the development site.

There are two existing houses in Yampi Court, that adjoin the proposed development site that will have an additional 4 and 5 neighbours behind them, making their total neighbours 7 and 8 respectively (as depicted in the following diagram):



The following diagram depicts proposed allotments that have between 7 and 10 neighbours situated round them:



Members in the community could expect to have 3 neighbours but a development plan that results in residents having 10 neighbours should not be accepted.

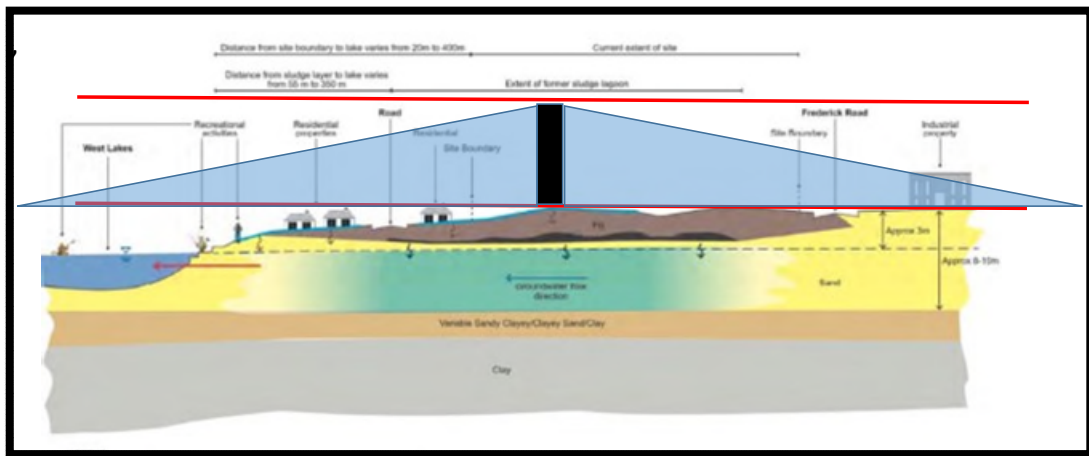
The other concerning effect this will have will be the impact on existing neighbouring house prices. Having 4 and 5 rear neighbours, where there were none before, will result in lower house prices. Council should not allow a development knowing that house prices will reduce as a consequence.



## The Proposed 5 Storey Development Will Look Like 7 Storeys

As a result of planned TNVs that seek to allow buildings to be built higher than surrounding buildings, an increase in the actual ground height through soil mitigation capping and the existing higher ground level of the development site, any building will be taller than any similar same storey buildings outside the area.

The following diagram seeks to pictorially represent the Field of View of a 7 Storey building across the site. The diagram is an amended version of an SA Water Cross Section diagram of the site. This independent Cross Section diagram clearly depicts the higher ground level within the proposed development site. The tall black rectangular shape represents a 7 Storey building and the blue semi-transparent triangular shapes represent the Field of View:



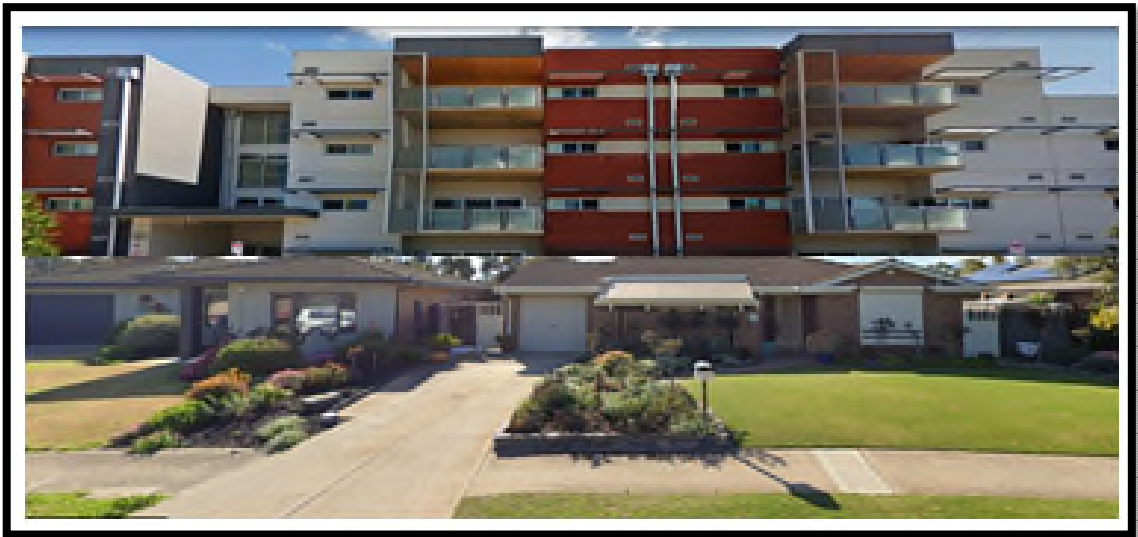
Depicted further, the following diagram represents an aerial outlook of what the Field of View is likely to be. Not only will people in the top floor have astronomical views but the building will easily be seen for kilometres across the flat Adelaide plains.



The following image is from Google Maps and depicts houses on Lakeview Avenue, West Lakes:



The following image, also from Google Maps, depicts a representation of what a 7 storey building could look like behind Lakeview Avenue:



An eye sore such as this should not be acceptable or allowable within the adjoining 1 and 2 storey suburbs.

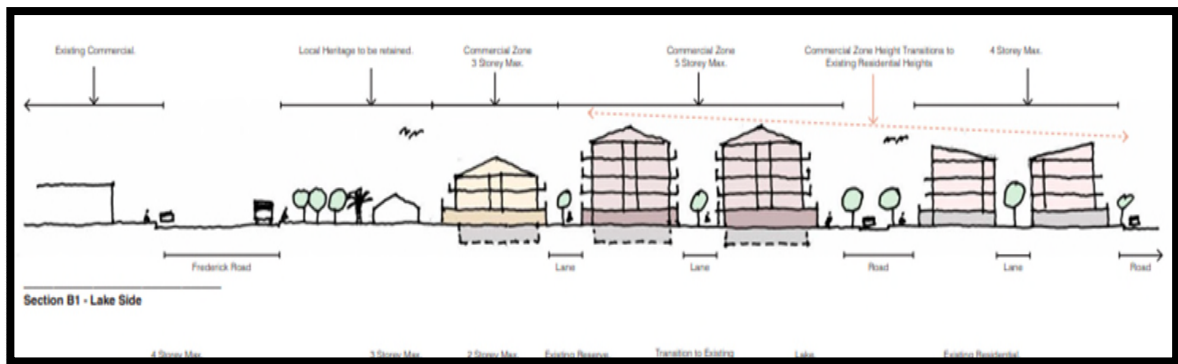
## EPA (Environmental Protection Agency) Contamination Audit

The Group accepts that an independent audit of contamination was conducted by the EPA (Environmental Protection Agency).

However, the EPA Auditor stated *'No active remediation is considered to be required for the Site based on low density residential and other mixed land use* (Attachment L – Environmental Investigations, Page 16).

The proposed development however is for Low and Medium density residential and Medium Retail development.

On first reading it may not be considered much of an issue, however, a Higher density development means excavations for foundations and underground garages will be required to dig deeper into the soil and potential contamination. The following diagram, from Page 129 of the West Lakes Code Amendment – Attachment E – K documents, is a Cross Section depiction of how the Higher density buildings will look, underground car parking is evident in 3 middle buildings:



This type of deeper soil disturbance, the result of Medium density development is likely to require soil remediation.

It should be the assessment and recommendation of the EPA as to what type of soil remediation is required.

In the interests of community safety, the development proposal should have this EPA advice included.

**OUTCOME 3:**

No Medium or High-density development is considered at the site until the EPA (Environmental Protection Agency) has made an assessment on soil remediation strategies required.

**Non-compliance With Major Transport / Road Corridor Development Policy**

The 30-Year Plan (2010) identified 14 new Transit Oriented Developments (TOD) across Adelaide. A TOD is a development that is closely aligned in distance to Major Transport Corridors or Major Road Corridors.

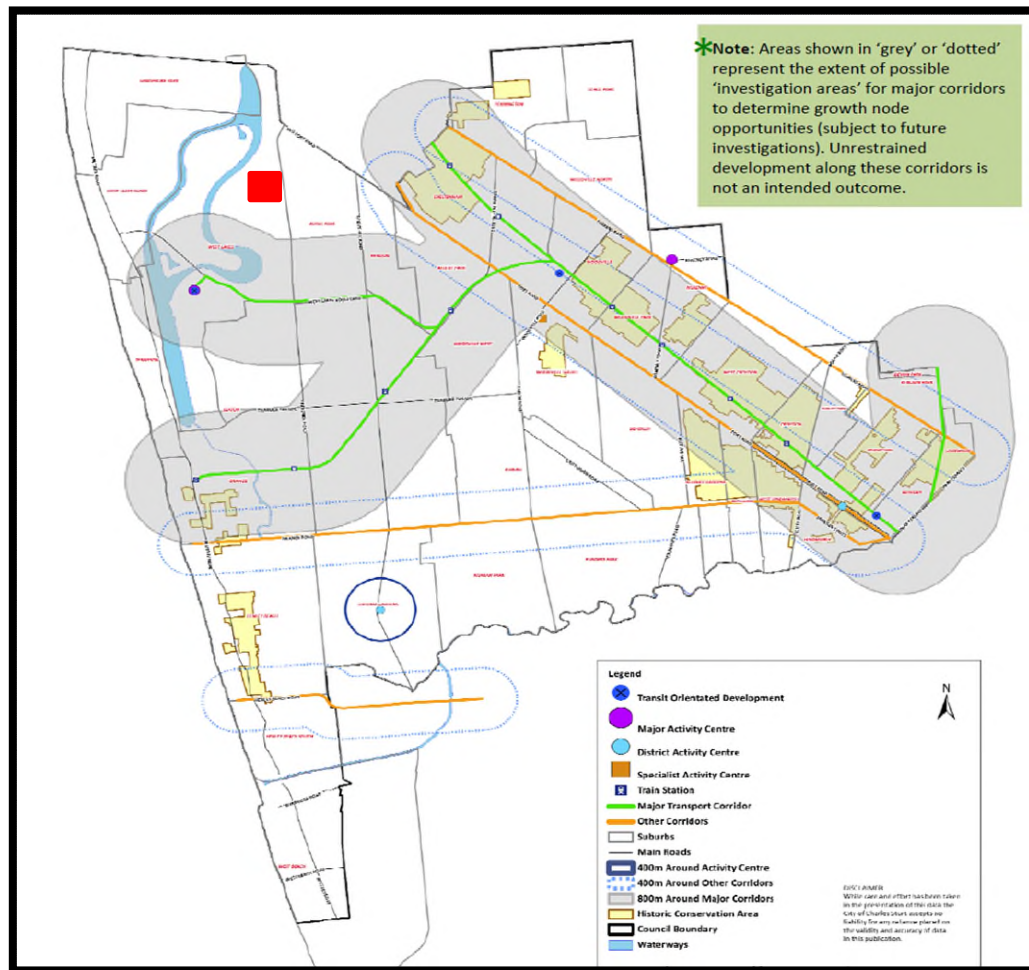
The Plan did not identify this site as a possible TOD.

The Plan identified that developments within certain distances of TODs had to have certain height restrictions. The rationale for the restrictions was that the closer you lived to a TOD the higher the buildings could be.

The maximum distance for a TOD aligned to a Major Transport Corridor is 800 metres as this was considered the maximum someone would want to walk to catch a train, tram or bus.

The maximum distance for a TOD aligned to a Major Road Corridor is 400 metres.

The following diagram from the Council's Residential Growth & Character Study Report (2011) depicts Major Transport Corridors as 'grey shading' and the development is the 'red' square:



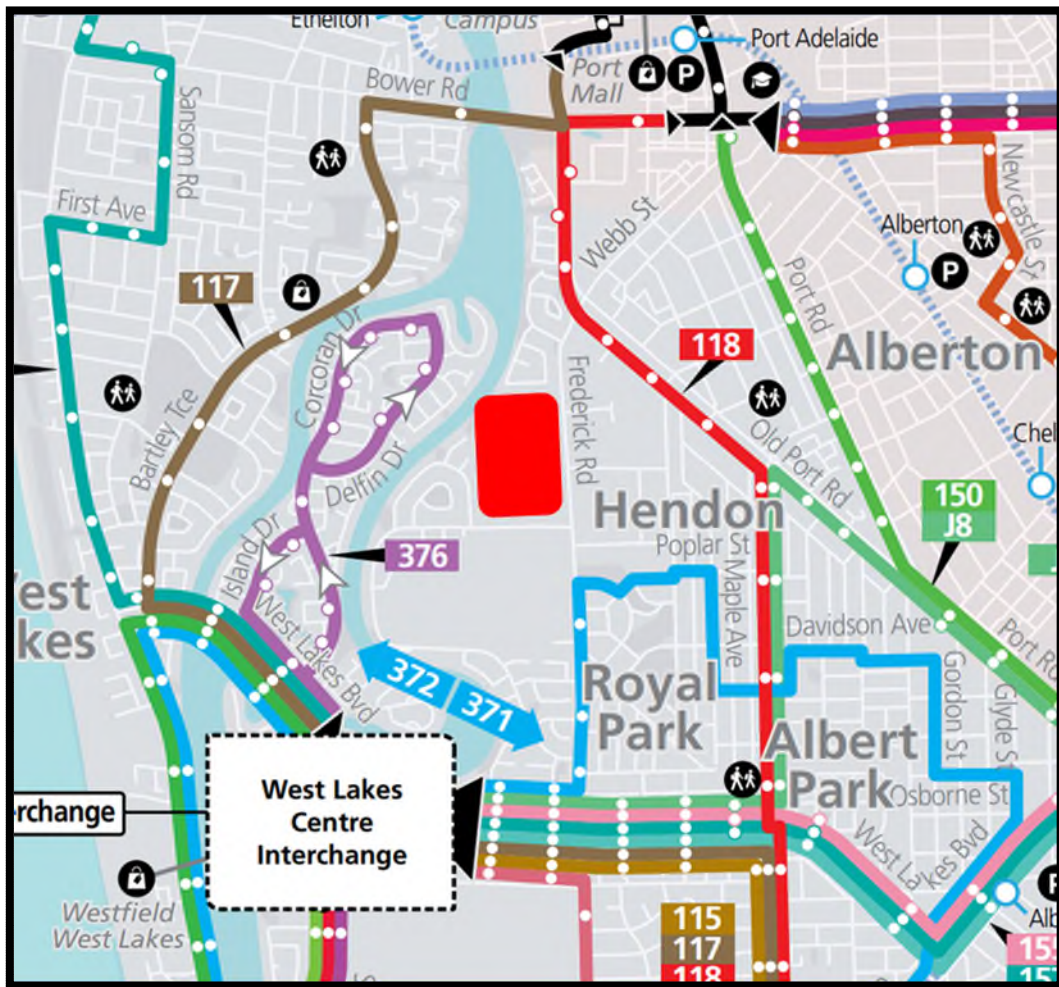
It should be noted that the 'grey shading' along West Lakes Boulevard was predictive for a proposed tramline that did not eventuate.

Therefore, when assessing this development site, it is noted that it is not within the 400 metres of a Major Road Corridor or 800 metres of a Major Transport Corridor.

The proposed development site is not serviced by any public transportation of trains, trams or buses. This submission has demonstrated the proposed zone does not align with public transportation policies.

The following diagram depicts the site (red shape). The nearest buses are the #118 North on Old Port Road and the #371 / #372 buses South on Frederick Road:





The following diagram based on Google Maps Direction distances depicts the actual walking distance to get from the middle of the site to each of the nearest bus stops:

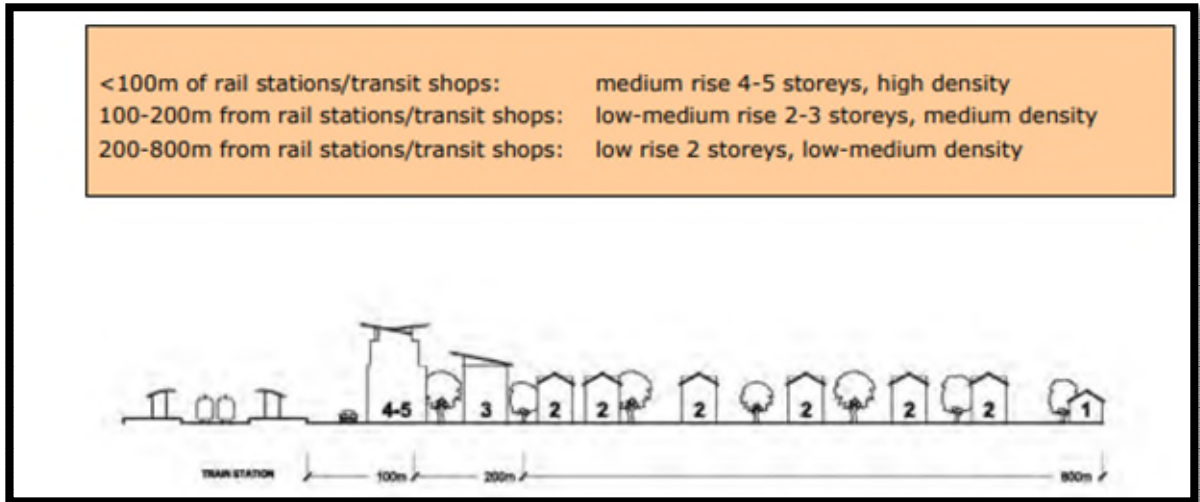




This site is not in an ideal location to catch public transport (buses) and the distance to the nearest train is nearly 2.5kms.

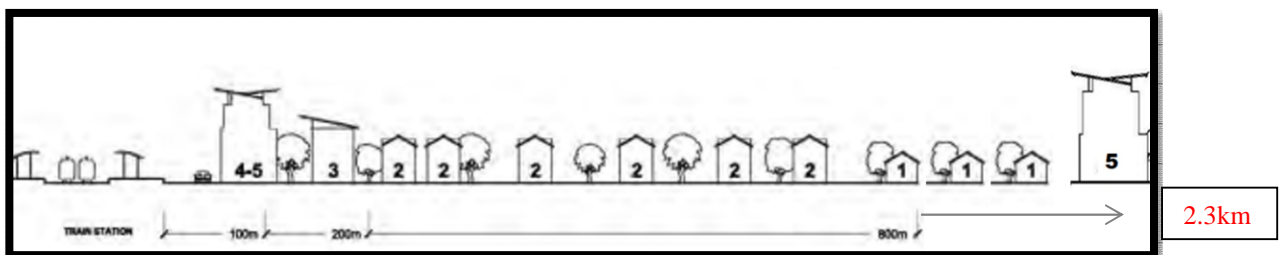
The 30-Year Plan intent was to have higher density buildings closely aligned to TODs.

The distances and indicative building heights for TOD aligned to a Major Transport Corridor are depicted in the following diagram:



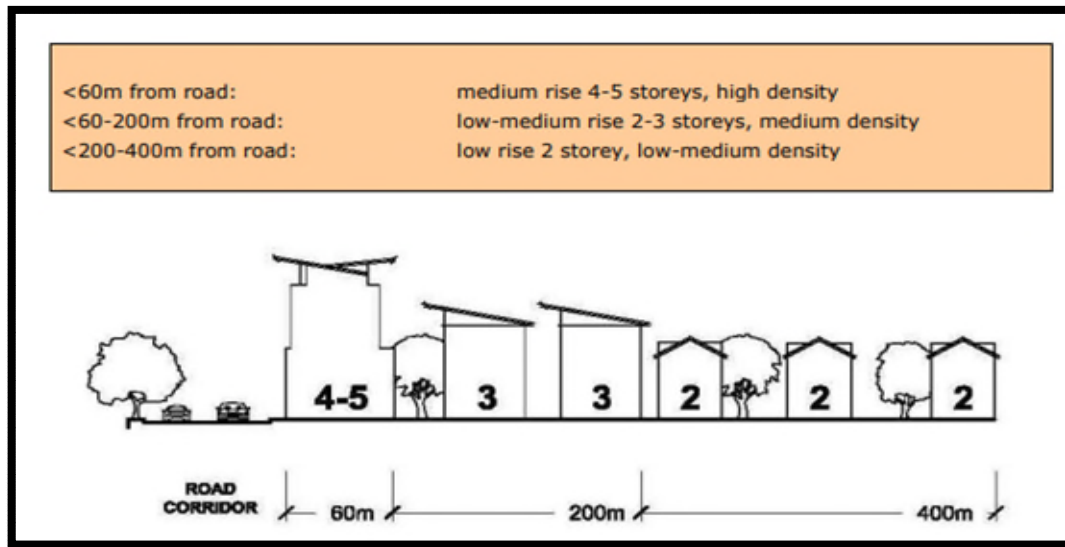
As discussed, as the site is not within 800 metres of a TOD (Major Transport Corridor), the buildings heights of the development should be commensurate with neighbouring buildings. However, despite this, the proposal is to have 5 storey buildings in the development anyway.

The following diagram depicts a cross section view of what the development would look like 2.3km from the Port Adelaide train station if approved:

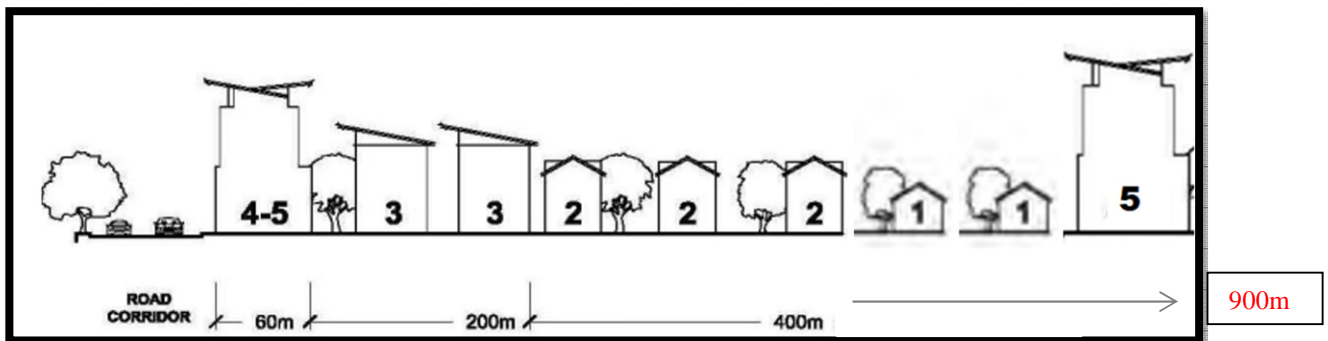


It is clear that a 5 storey building is out of alignment with proposed heights given the distance from a Major Transport Corridor.

The distances and indicative building heights for TOD aligned to a Major Road Corridor are depicted in the following diagram:



The following diagram depicts a cross section view of what the development would look like 900m from Old Port Road if approved:

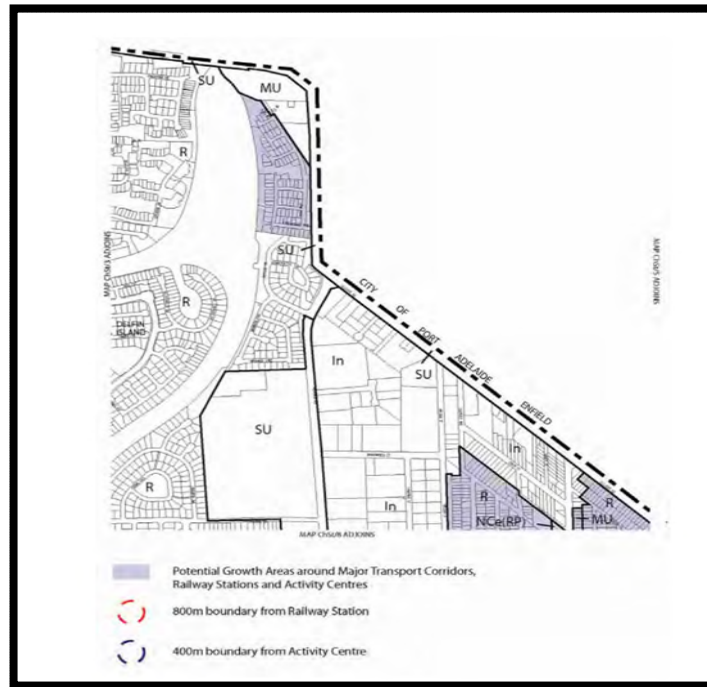


It is clear that a 5 storey building is out of alignment with proposed heights given the distance from a Major Road Corridor.

### Not in Potential Growth Area

Council's Residential Growth & Character Study Report (2011) identified potential growth areas within the Council area. These areas had the potential to be re-zoned allowing for higher density development.

The grey shaded areas are the potential growth areas around Major Transport Corridors and Retail Shopping Centres. It can be clearly seen that the development site and surrounding areas were not identified as potential growth areas:



It is clear that the development site has never been identified for medium or high-density development. It is outside TODs and there is no close connection with any Major Transport or Road Corridor.

A revised 30-Year Plan For Greater Adelaide (2017) maintains a commitment to the objectives and principles from the original 2010 Plan.

The vision of this revised Plan includes (Page 14):

*'Metropolitan Adelaide will be 1 to 3 storeys, complemented by 4 to 6 storey's along key transport boulevards...'*

Page 14:

*'New housing will be focused in areas close to existing and new high quality public transport infrastructure.'*

Page 21:

*'...to ensure that increased density can be accommodated close to public transport...'*

Page 21:

*'Greater density does not mean height. Density can be achieved without high-rises...'*

It is abundantly clear that the proposed zoning and concept plan do not fit in with planning principles.

### Community Sports Field (Playground & Water Feature)

There is a lack of community sports fields in the Western suburbs.

The closest sports field to the development site is Cooke Reserve situated 1.1km to the South, as depicted below:



Inclusion of a sports field, similar in size to a soccer field and incorporating a playground is something that is desperately needed in the community.

We are not aware of any other development where a water feature has not been incorporated into the design, this will add considerable appeal to the neighbourhood.

#### **OUTCOME 4:**

A sports field, playground and water feature should be built into the development.

### Odours Emanating From The SA Water Bio-filter Exhaust Stack

The SA Water Bio-filter Exhaust Stack is the current SA Water infrastructure at 101 Frederick Road.

It operates constantly and under normal operation an acceptable odour level of 2 OU (Odour Units) is restricted to the 16m high exhaust stack.

The developer obtained a consultant to assess any potential odour from the site that would extend to neighbouring residents.

The consultant determined that in the event of a temporary plant upset detectable odour could extend into the residential zone to become distinct and recognisable.

Residents in the 3 and 4 storey buildings could have an odour level of 3-4 OU.

In contrast, a 4 OU smell is distinct and the source can probably be recognised. For example, hydrogen sulphide smells like rotten eggs and can be associated with sewage.

The 'red' line in the below diagram depicts the extent of odour modelling extending into the residential area:



So, to be clear, the developer is planning medium density housing knowing that odour, possibly smelling like sewage, could extend to dozens and dozens of residents.

At no time should a development of this magnitude be allowed knowing that sewage smell could extend to residents.

**OUTCOME 5:**

No Medium or High-density development is approved within the SA Water Pump Station odour modelling zone.



## Retainer Wall Development

A Soil Remediation option appearing to be favoured by the developer is the use of 'Capping' and retainer walls (with voids in-between) to raise ground heights. The following diagram depicts the apparent plan:

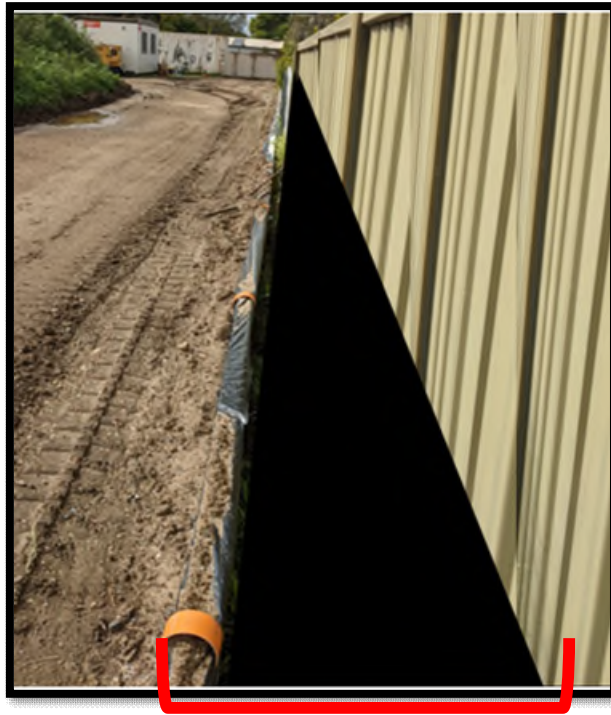


It appears that this plan would be used to raise the ground height up to 2 metres so storm-water pipes would divert water to the North-Western corner of the site and eventually discharge into the lake.

The issue with this plan however is that it likely results in 'voids' between fencing. Below is an example of a void between a retainer wall and the fence-line:



The width of these voids varies however there are numerous as wide as 80 cm in numerous locations. An example of an 80cm void is depicted below:



(80cm Void & Retaining Wall)

The issue with these voids is:

- It raises the ground level from one neighbour to another
- Would act as a wind tunnel
- Would act as a water tunnel
- Would allow weeds to grow unchecked
- Would be a rubbish collector
- Would allow rodents to roam unsighted
- Would be potential death traps for small children if they fell in them

There are other soil remediation options available and the use of capping and retainer walls should not be permitted.

**OUTCOME 6:**

Soil remediation use of capping and retainer walls is not permitted.

**Issues Regarding Justifying The Proposed Development Zone**

Documents supplied by the developer and other documents prepared by Council were

reviewed and found to contain various issues that are considered misrepresentative in justifying the proposed zone.

#### Non-alignment With Planning Policies Issues

15/8/22

City Services Committee Minutes – 4. Business – 4.18 WEST LAKES RESIDENTIAL AND MIXED USE DRAFT CODE AMENDMENT (PRIVATELY FUNDED) – FOR CONSULTATION.

Information contained within the above documents were presented at the City Services Committee and made available to the public.

Page12

The document states that under the 30-Year Plan For Greater Adelaide, it is important to locate higher densities in and near established services and transport corridor catchments.

It further states that the 'draft Code Amendments alignment with key policies and targets'.

Also, 'to make better use of the Affected Areas proximity to public transport, established services...'

Page 109 Attachment D – Strategic Planning Outcomes

The documentation states there are 16 State Planning Policies (SPP) and the proposed development fits in with the following Policies:

Strategic Transport Infrastructure Objective:

To integrate land use policies with existing and future transport infrastructure, services and functions to preserve and enhance safe, efficient and reliable connectivity for people and business.

SPP 11.2 Development that maximises the use of current and planned investment in transport infrastructure, corridors, nodes and services.



SPP 11.5 Encourage development that supports the increased use of a wider variety of transport modes, including public transport, walking and cycling, to facilitate a reduced reliance on private vehicle travel and promote beneficial community health outcomes.

Page 111 Attachment D – Strategic Planning Outcomes

The Regional Plans support the 30-Year Plan. The Council document states the proposed development supports key policies and targets and in particular:

Regional Plan 30–Year Plan for Greater Adelaide:

Policy Theme Transit corridors, growth areas and activity centres.

Policy 1 Deliver a more compact urban form by locating the majority of Greater Adelaide's urban growth within existing built-up areas by increasing density at strategic locations close to public transport.

Policy 2: Increase residential and mixed-use development in the walking catchment of:

- Strategic activity centres
- Appropriate transit corridors
- Strategic railway stations.

In relation to both the State Planning Policies and the Regional Plan Policies, it is not in a strategic location close to public transport or near a major public transport corridor, in fact there is no public transport that passes the proposed development.

The nearest bus is 1km away.

September 2022

Council Information Brochure For Residents

In September 2022, Council mailed out information documents relating to the proposed code amendment to residents living around the development site.

The information did not acknowledge there was no Public Transport alongside the development site.

### ISSUE

The Code Amendment proposal is written in a misleading manner to make it appear it is in alignment with the 30-Year Plan for Greater Adelaide, State Planning Policies and the Regional Plan Policies in regard to the Public Transport Policies.

Without being able to align to these policies it would probably be impossible to justify the proposed zoning.

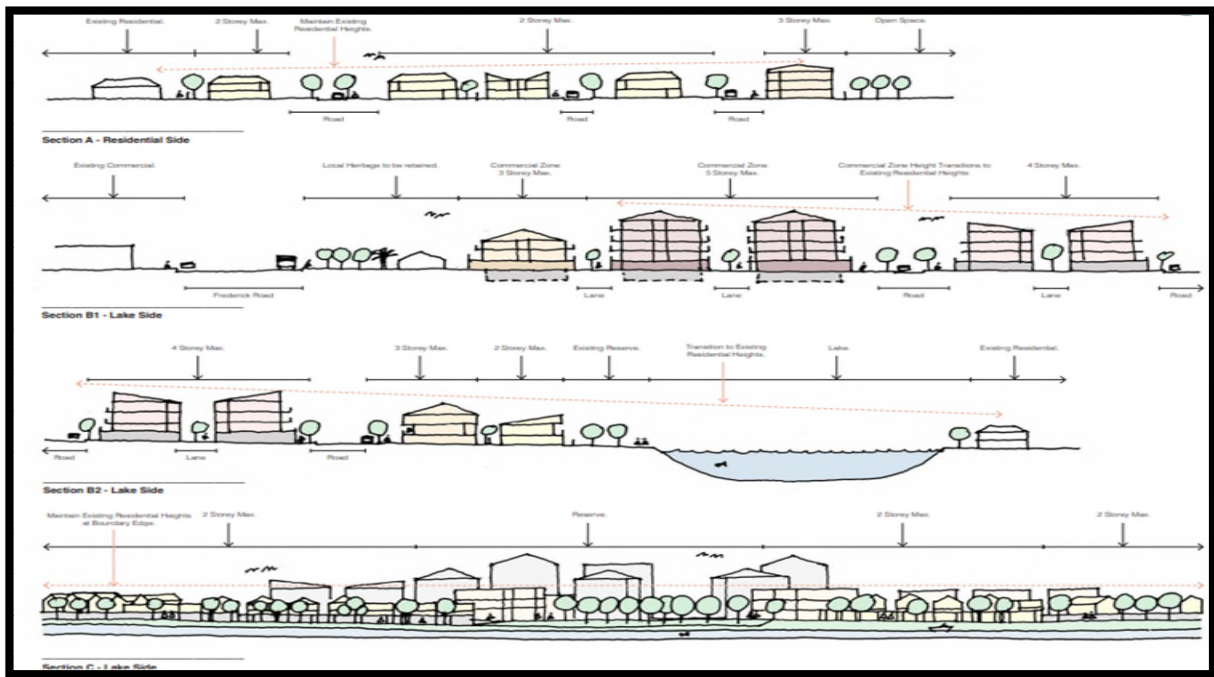
The brochure to residents contained no information concerning the lack of Public Transport availability. Including the real and actual information may have led people to question the development more and potentially stop it.

### Representation Of Development Building Heights Issues

Page 16

City Services Committee Minutes – 4. Business – 4.18 WEST LAKES RESIDENTIAL AND MIXED USE DRAFT CODE AMENDMENT (PRIVATELY FUNDED) – FOR CONSULTATION.

There is a cross section diagram depicted of the development. 1 and 2 storey buildings are shown as the same height and the angle of elevation (red dotted line) is not drawn accurately.



## ISSUE

The diagram is misleading people to believe the high-rise buildings are not that problematic. The correct heights of buildings would make it look worse if the proper angle was drawn accurately as it would show a more pronounced angle of elevation. These diagrams are misleading.

Open Space issues

Page 18 (and Page 70)

City Services Committee Minutes – 4. Business – 4.18 WEST LAKES RESIDENTIAL AND MIXED USE DRAFT CODE AMENDMENT (PRIVATELY FUNDED) – FOR CONSULTATION.

Page 119 Attachment D – Strategic Planning Outcomes

The Public Open Space is recorded as 'approximately 20%' and 'in the order of 20%'. The actual percentage is known to be 17.9% and was rounded up.

September 2022

#### Council Information Brochure For Residents

In September 2022, Council mailed out information documents relating to the proposed code amendment to residents living around the development site.

The information stated the Open Space was recorded as 'approximately 20%'.

#### ISSUE

Rounding up the Open Space percentage is misleading people to believe there are more reserves and play areas than there really are.

The actual percentage was known but not used.

The brochure to residents contained misleading information making them believe there was more open space than there actually was going to be. Including the actual information may have led people to question the development more and potentially stop it.

#### Development Site Utilities Issues

Overall assessments have been produced indicating that the capacity of utilities to service the proposed development are sufficient. However, there are documents that seem to suggest the capacity may not be sufficient. Examples are as follows:

Page 19

City Services Committee Minutes – 4. Business – 4.18 WEST LAKES RESIDENTIAL AND MIXED USE DRAFT CODE AMENDMENT (PRIVATELY FUNDED) – FOR CONSULTATION.

The report states utilities are assessed as not requiring 'significant extensions'. However, the Developer's more detailed documents record that:

Water: No flow test data has been obtained.

SA Water emailed the developer on 18 March 2022 (FMG Preliminary Infrastructure Assessment Appendix C) stating they 'couldn't see any flow test data associated with the subject site'.

Gas: No Capacity Report exists.

On 16 March 2022, the developer emailed a representative of 'Australian Gas Infrastructure Group' requesting consideration of the Concept Plan of up to 600 residential outcomes.

The response advised the supply shouldn't be an issue but they were awaiting a 'Capacity Report'.

No capacity report was identified in the developer's documentation.

Electricity: No assessment had been made.

(An email was sent to the developer from SA Power Networks on 11 May 2022 (FMG Preliminary Infrastructure Assessment Appendix F).

Part of the email stated:

'The development can be serviced from the existing electrical infrastructure however no assessment has been made on the capacity of the Network or its suitability to carry the additional load'

Appendix 1 Page 23

The report states the development 'is well serviced with infrastructure, with only minor enhancement required'.

Appendix 1 Page 37

The concluding summary states the existing infrastructure 'has sufficient capacity to service the Affected Area'.

Appendix 1 Page 74

The Policy Implications summary states that 'No specific policy on the provision of infrastructure in (sic) considered necessary given the suitability of infrastructure...'.

September 2022

### Council Information Brochure For Residents

In September 2022, Council mailed out information documents relating to the proposed code amendment to residents living around the development site.

The information stated the infrastructure was identified as not requiring 'significant extensions'.

### ISSUE

The report states the following for the proposed development:

- is well serviced with infrastructure,
- that there is sufficient capacity,
- the infrastructure is sufficient.
- no significant extensions to utilities are required,

The information provided to residents intimated there is sufficient capacity in infrastructure when this is not actually known.

It is unknown if further documentation has been provided that demonstrates assessments have been conducted.

The report seemingly relies on a consultant's assessment that there should be sufficient capacity. It is difficult to understand how no significant extensions would be required given the above issues.

Whilst these issues would be fully dealt with during the development phase, actual and accurate information should be known before it is presented to Council and residents to vote on a Code Amendment.

It should not be implied that there is sufficient capacity. The brochure to residents contained misleading information concerning the status of infrastructure capacity. Including the real and actual information may have led people to question the development more and potentially stop it.

## Distances From The Development Issues

City Services Committee Minutes – 4. Business – 4.18 WEST LAKES RESIDENTIAL AND MIXED USE DRAFT CODE AMENDMENT (PRIVATELY FUNDED) – FOR CONSULTATION.

The report highlights various distances from the Development Site to different locations. Distances were compared using Google Maps to see how far it is to either walk or drive to the areas. The distances were taken from the middle of the development site: Page 7 and onwards in Appendix 1

PAGE	LOCATION	REPORT DISTANCE	GOOGLE MAPS
7#	West Lakes Shops	1.3km	3.3km
7	Royal Park - Hendon	1km	1.7km
9^	371 Bus stop	500m	1km
9^	118 Bus stop	400m	1.1km
10	West Lakes Golf Course	50m	2.3km
10*	Cooke Reserve	200m	1.1km
10	Aquatic Reserve	1.1km	1.9km
10*	West Lakes Shops	1.26km	3.3km
10	Port Adelaide Shops	1.5km	2.2km
10	Arndale Shops	4.4km	6.7km
11	West Lakes Golf Course	50m	2.3km
11	Woodlake Shops	1.2km	1.7km
11#	West Lakes Shops	2.4km	3.3km
11	ALDI Store	1.7km	2.4km
27	West Lakes Golf Course	50m	2.3km
27	Woodlake Shops	1.2km	1.7km
27#	West Lakes Shops	2.4km	3.3km

27	ALDI Store	1.7km	2.4km
28^	371 Bus stop	Just South	1km
28^	118 Bus stop	Short distance North	1.1km
44	Woodlake Shops	1.2km	1.7km
58^	371 Bus stop	500m	1km
68*	Carnegie North (Cooke) Reserve	1km	1.1km

# Identifies discrepancies of distances to the same location (West Lakes Shops)

\* Identifies discrepancies of distances to the same location (Cooke Reserve)

^ Identifies discrepancies of distances to the same location (Bus stops)

PAGE	LOCATION	REPORT DISTANCE	GOOGLE MAPS
7#	West Lakes Shops	1.3km	3.3km
10#	West Lakes Shops	1.26km	3.3km
11#	West Lakes Shops	2.4km	3.3km
27#	West Lakes Shops	2.4km	3.3km

10*	Cooke Reserve	200m	1.1km
68*	Carnegie North (Cooke) Reserve	1km	1.1km

PAGE	LOCATION	REPORT DISTANCE	GOOGLE MAPS
9^	371 Bus stop	500m	1km
28^	371 Bus stop	Just South	1km
9^	118 Bus stop	400m	1.1km
28^	118 Bus stop	Short distance North	1.1km



Page 120 Attachment D – Strategic Planning Outcomes

The City of Charles Sturt – Draft Your Neighbourhood Plan 2020 highlights that for Community Services 'Living within 400m of social infrastructure leads to higher levels of walking and cycling...'

It also states that the proposed rezoning caters for a more 'walkable and vibrant neighbourhood'.

There is no distance recorded in Google Maps that is less than 1km.

The shortest distance that is recorded in the Council document is 50 metres to the West Lakes Golf Course, however this is only achievable if you could fly!

### ISSUE

The distances are clearly 'as the crow flies' and are accepted as 'Planners' judging distances. However, when preparing reports for the community so they can determine how close services and public transport are, real driving or walking distances should be used.

To use any other method is misleading as it makes people think the development is actually closer to amenities than it really is.

It is also misleading that for distances to the North of the site, distances were taken from the Northern end of the development, whilst distances to the South of the site were taken from the Southern end.

A more transparent method would have been to take the distances from the same location for all distances.

### Traffic Issues

Page 56, 57 & 58

City Services Committee Minutes – 4. Business – 4.18 WEST LAKES RESIDENTIAL AND MIXED USE DRAFT CODE AMENDMENT (PRIVATELY FUNDED) – FOR CONSULTATION.

Information contained within the above documents were presented at the City Services Committee and made available to the public. 15/8/22

The report states:

- There are 'approximately 1,500 vehicles per day' that currently use Lochside Drive.
- The predicted daily traffic volume using the proposed new road into the development site from Lochside Drive will be '2,325' vehicles per day
- The vehicles will increase to 'approximately 3,100' vehicles per day on Lochside Drive.

If there are already 1,500 vehicles and it is predicted to have another 2,325 vehicles the total is 3,825 vehicles, not the 3,100 as recorded.

This is an additional 725 vehicles per day using Lochside Drive that has not been identified to the community.

September 2022

Council Information Brochure For Residents

In September 2022, Council mailed out information documents relating to the proposed code amendment to residents living around the development site.

The information stated traffic in Lochside Drive will increase to 'approximately 3,100 vehicles' daily.

The Brochure did not accurately report the numbers of vehicles that were going to use Lochside Drive.

### ISSUE

The documents did not accurately summarise the correct number of vehicles that were going to use Lochside Drive by 725 and misled the community to believe the traffic issue was not going to be a significant issue.

The brochure to residents contained misleading information making them believe there was a reduced traffic impact. Including the actual information may have led people to question the development.

## Consideration of the Developer's Costs and Yields

18 October 2022

During a meeting with Council Planning staff and the developer, the Leadership Team were advised that in considering what zone could apply to the proposed development, the Developer's costs and yields had to essentially be taken into account.

The Leadership Team stated to Council staff that they should not be concerned about how much profit a developer could make, instead they should be ensuring the best outcome for the community.

### ISSUE

A Developer's potential profit should not be a consideration when deciding on possible zoning, it should be based on what is the best outcome for community, its needs and expectations.

## Community's Preferred Code Amendment Zone

The Leadership Team has listened to and has the full support of the community to present their preferred zone.

The community assisted in developing and agreeing that the correct zone that should be applied to the site is the:

### Waterfront Neighbourhood Zone

There are many reasons for this decision, some of which are summarised below:

- The entire surrounding community is the same zone,
- The zone would still allow an affordable housing overlay,
- The zone would still allow for a variety and diversity of housing types,
- The zone is low density like the surrounding neighbourhood,
- The zone maintains the character of the suburb,
- The zone complies with all planning codes and policies,
- The zone maintains the neighbourhood appeal and would not result in reducing house prices ,
- The zone does not mean Significant / Regulated & Exempt trees will be removed,
- The zone is not dependant on being close to Major Transport Corridors,
- The zone is not dependant on being close to Major Traffic Corridors,
- The zone will not allow residents to have 10 adjoining neighbours like the proposed zone and Concept Plan,
- The zone does not propose buildings greater than 2 storey's so residents will not be subject to any odours emanating from the existing SA Water bio-filter stack,
- Council previously assessed the site as the same type of residential zoning,
- The State Treasurer (Stephen Mullighan MP) agrees this is the correct zone to apply to the site, and
- Deep End Services (an economic research and property consulting firm utilised by Developer) identified that this zone could be used at the site\*

\*Deep End - West Lakes Residential & Mixed-Use Code Amendment Retail & commercial land use investigations - 27 July 2022, Page 5 and Page 6.

**OUTCOME 7:**

The proposed development at 100 Frederick Road, West Lakes, SA, 5021 (the former SA Water Waste Treatment Site) is a Waterfront Neighbourhood Zone.

**Technical and Numerical Variations (TNVs)**

Technical and Numerical Variations relating to heights of buildings, setback frontages etc, should be the same as the surrounding neighbourhood.

It is noted that under the proposed code amendment the TNVs for the site have been adjusted (increased) from the surrounding neighbourhood.

**OUTCOME 8:**

The proposed development at 100 Frederick Road, West Lakes, SA, 5021 (the former SA Water Waste Treatment Site) has the same Technical and Numerical Variations (TNV) Overlays as the adjoining Waterfront Neighbourhood Zone neighbourhood.

**Future Land Purchase From SA Water**

Should the developer purchase a portion of SA Water's Lot 101, as is their intent, the same Waterfront Neighbourhood Zone, Mixed-Use Sub Zone and TNV restrictions as previously discussed as applying to 100 Frederick Road West Lakes should apply to this parcel of land.

**OUTCOME 9:**

Any proposed development at 101 Frederick Road, West Lakes, SA, 5021 (land purchased from SA Water) has the same Waterfront Neighbourhood Zone, Mixed-Use Sub Zone and Technical and Numerical Variations (TNV) restrictions as 100 Frederick Road, West Lakes and the adjoining Waterfront Neighbourhood Zone neighbourhood.

## Open Space

The legislative requirement of open space for this development is 12.5%.

The developer has stated that with Lot 100 and a portion of 101 Frederick Road purchased, the open space would be 17.9%.

If land at 101 Frederick Road is not purchased the open space reduces to approximately 5.87%

The developer's concept plan allows for 2 small reserves.

The developer's concept plan of open space includes a location where two large concrete tanks exist.

There is a developer's 'Opportunity' concept plan (Attachment H – Open space and urban design investigations – 4) that states these two tanks could be repurposed as landscape elements. The following diagram depicts where the tanks are located in the proposed open space area:



Repurposing them does not mean removing them. If they remain, how is the area open space? This would mean the percentage of open space would be significantly less.

The community is making submissions that open space consist of boundary buffer-zones, the Pinery forest, a community sports field and an appropriately sized community water feature. These will be separately discussed in this submission.

The Planning and Development Fund is an offset scheme that provides grants to improve access to public open spaces and places.

Offset schemes enable the planning, design and delivery of quality public space that is essential to healthy, liveable communities.

The Fund operates under the *Planning, Development and Infrastructure Act 2016* and provides the means for open space and public realm investment across South Australia.

Money paid into the Fund is derived from monetary payments in lieu of open space requirements for specific types of development. The Fund is expended in line with provisions within the Act and is administered by the Office for Design and Architecture SA within the Attorney-General's Department.

While supporting the Minister for Planning to acquire, manage and develop land for open space, the Fund provides grant funding opportunities for local government through the Open Space Grant Program.

This means two things:

1. The developer can make a payment in lieu of actual open space, and
2. Council can apply for a grant from the Government to acquire land for open space.

The developer should not be allowed to make a payment in lieu of open space.

To achieve a better outcome the Council should make an application for a grant to purchase additional land in the development site for open space.

In 2021/22 the Council applied for and received \$970,000 for the creation of a new local open space reserve in Royal Park.

There is no maximum limit the Council can apply for and they can apply for more than 1 project at a time.

**OUTCOME 10:**

Council does not allow for any financial contribution to be paid into the Planning and Development Fund by the developer in lieu of any open space.

### OUTCOME 11:

Council applies for a grant under the Planning and Development Fund to fund open space consisting of:

- Boundary buffer-zones
- The Pinery
- Sports Field
- Community Water Feature.

### Buffer-Zones around the site Boundary

As part of the West Lakes development, housing blocks were sold directly adjoining the former SA Water Treatment Plant.

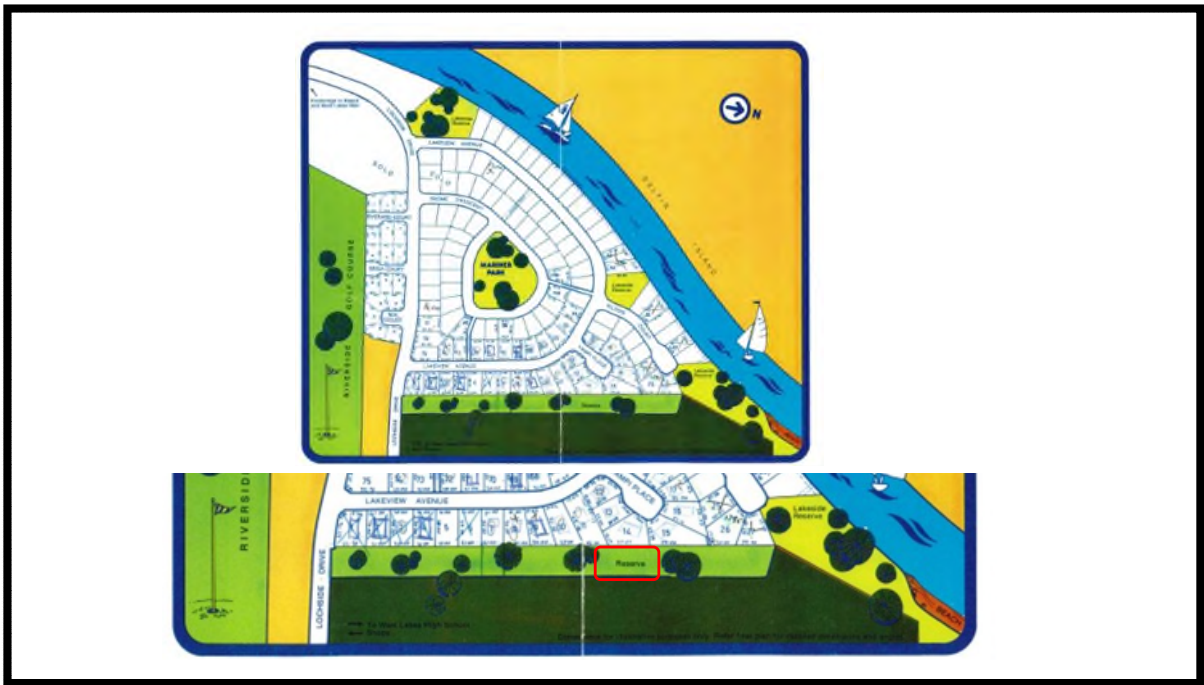
Residents who built on these blocks had buffer-zones between them and the actual Treatment Plant.

The development to the West of the Treatment Plant was sold as 'Mariner Park'. The original sales brochure is depicted in the following diagram:



A 40 metre buffer-zone was drawn and marked as a 'Reserve' and was fenced off from the public and only accessible to adjoining residents as depicted in the following diagram which was include in the brochure:





The following pictures depict views of the buffer-zone from the early 1980's:



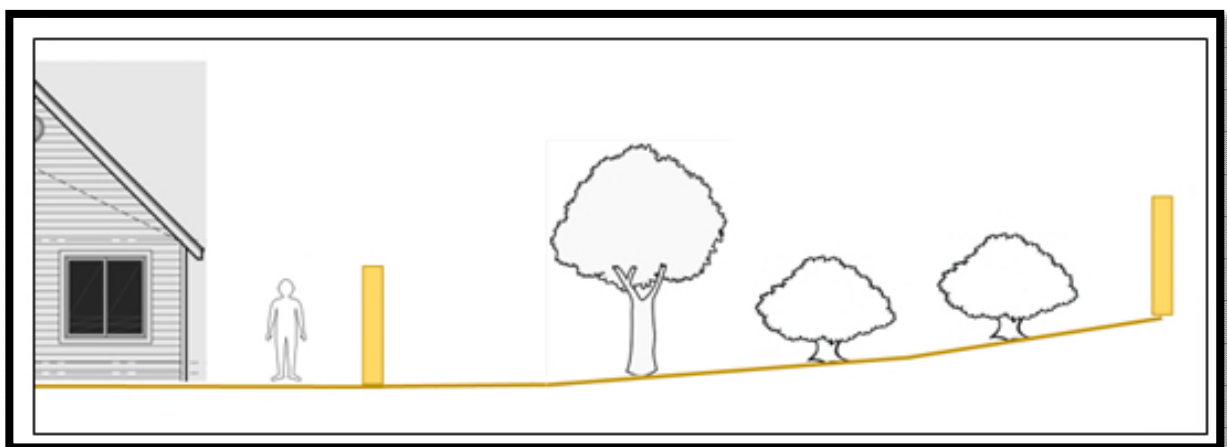
Residents purchased the land and built on the Western side of the site because they believed it offered privacy and a semi-rural view. They have been treated to views of trees growing and a myriad of birdlife (including the Vulnerable Yellow-Tailed Black Cockatoos).

Residents were told that the Reserve was actually an easement and would not be built on. Over the years this easement was removed and is no longer in place.

The Northern buffer-zone essentially consists of a dirt track between houses and the site and a Southern buffer-zone consists of a small dirt mound obscuring the view from Lochside Drive into the site as depicted below:



A cross section view of the Western buffer-zone is depicted as follows:

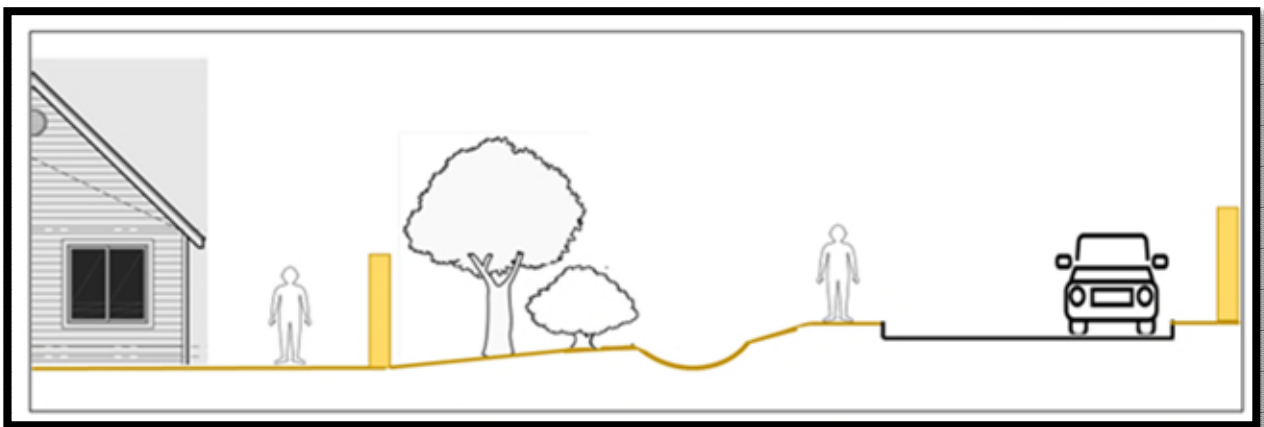


The proposed concept plan intends to build on the buffer-zones and to achieve a soil capping of 2 metres, a retainer wall plan has been developed. The likely effect will be houses built on higher ground and voids between fences as depicted below:



The Leadership Team has discussed with the Developer the possibility of a 20 metre buffer-zone (half of what it is currently) around the site as it has been for over 40 years.

The buffer-zone can be used as noise buffering, habitat protection for Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales, as depicted below:



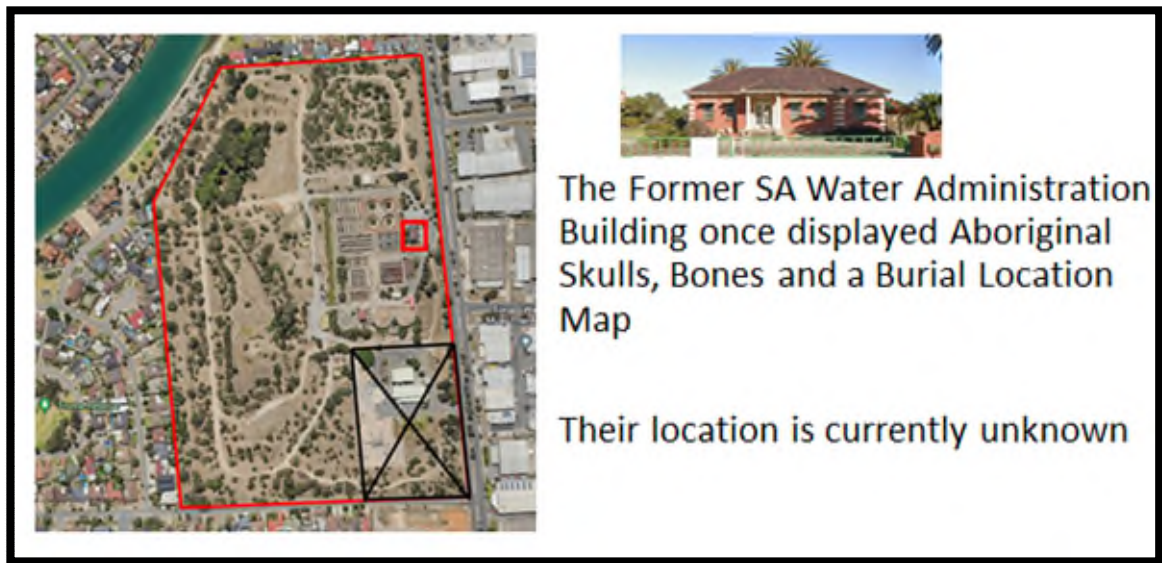
### Heritage Recognition

As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area.

More on the Pine Forest will be discussed in this submission.

It is also a known burial location. Whilst no registered Aboriginal site is recorded in the development area, Aboriginal bones, skulls and a hand-drawn map of where these bones were found in the site, were on public display in the former SA Water Administration Building up until approximately 1999.

Contact with SA Water has elicited the response that the bones have 'gone missing' and there are current efforts to re-locate them.



There are two community residents who have stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.

Relevant Aboriginal organisations, such as the Kaurna Yerta Aboriginal Corporation (KYAC), have been informed of this information so that appropriate measures can be taken to repatriate the remains.

Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.

Examples of such recognition can be seen in the Adelaide City Council's Aboriginal Heritage Trail along the River Torrens and the Port Adelaide Enfield Council's walking Trail along the Port River and in the historic precincts of Port Adelaide as depicted in the following diagrams:



## ADELAIDE CITY COUNCIL - ABORIGINAL HERITAGE TRAIL



## PORT ADELAIDE ENFIELD COUNCIL ABORIGINAL / HERITAGE TRAIL



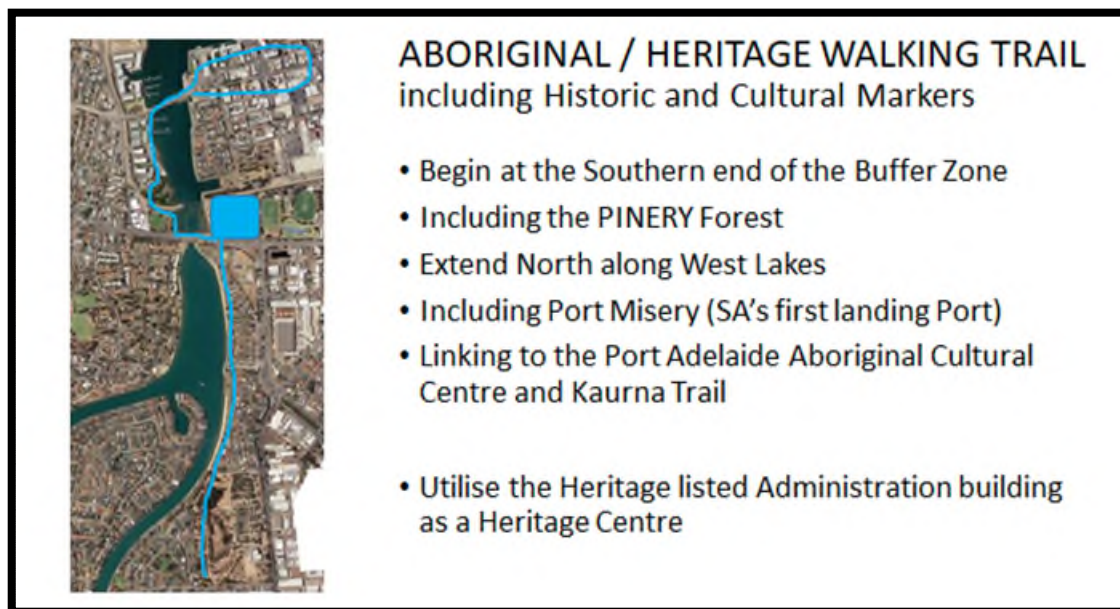
The community believes that an Aboriginal Cultural / Heritage walking trail could exist between the development site and the Kaurua Trail in the adjoining Port Adelaide area. The following depicts the Port Adelaide trail and a proposed cultural centre currently under construction:



The City Of Charles Sturt: Kurna Public Space Recognition and Inclusion Report, 2011 (Page 51) states there is an opportunity to continue the interpretation (of the Port Adelaide Kurna Trail) into the Charles Sturt area.

This could involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Port Misery and linking to the new Port Adelaide Cultural Centre being built.

The Aboriginal / Heritage walking trail would link existing historic sites in the Charles Sturt Council area to Port Adelaide as depicted in the following diagram:





The Trail inside the development site could look something like that depicted below:



The Leadership Team, on behalf of the community, is keen for Council to implement the recommendation included in their 2011 sponsored research.

It is noteworthy that the current Council Business Plan, under Section 1 – A strong and connected community states that:

*‘Connect with traditional owners to identify, promote, respect and protect Kaurna heritage and culture’.*

1. OUR COMMUNITY – A Strong and Connected Community	
Our Community Plan Outcomes	Our Organisational Plan Actions
In our City no one gets left behind; everyone has access to enough resources, services, programs, information and social infrastructure to fully participate in their community.	<ol style="list-style-type: none"><li>1. Develop mutually beneficial partnerships with key stakeholders that effectively respond to local needs and motivates and strengthens our community.</li><li>2. Creatively grow access to services in communities with limited or low access to existing services, facilities and programs</li><li>3. Reconfigure existing facilities to broaden their appeal, maximise resources, enhance/extend service offerings and remove barriers to participation.</li><li>4. Provide technology infrastructure and programs to support digital inclusion.</li></ol>
Charles Sturt is made up of strong and vibrant communities; we celebrate our identity, heritage and cultural diversity. People feel a	<ol style="list-style-type: none"><li>1. Connect with traditional owners to identify, promote, respect and protect Kaurna heritage and culture.</li><li>2. Create a more inclusive and accessible City that celebrates, partners and advocates for people of diverse culture and abilities</li></ol>

Further, the Plan states that:

*'In partnership and collaboration with the City of Port Adelaide Enfield, identify, support and implement at least four projects and events annually across the two cities that recognise and celebrate Kaurna led community building'.*

**Outcome - Charles Sturt is made up of strong and vibrant communities; we celebrate our identity, heritage and cultural diversity. People feel a sense of belonging, inclusion and social connectedness.**

**We will know we have succeeded by...**

- ❖ In partnership and collaboration with the City of Port Adelaide Enfield, identify, support and implement at least four projects and events annually across the two cities that recognise and celebrate Kaurna led community building.
- ❖ A Disability Access and Inclusion Plan (DAIP) is developed and endorsed by June 2021.
- ❖ An annual increase in the percentage of our community who feel a sense of community and belonging.
- ❖ Increase of 5% per annum in number of active volunteers.

The implementation of an Aboriginal Cultural Trail would align with the Council's Business Plan and they could use this to help achieve their own 'Outcomes'.

**OUTCOME 12:**

That collaboration is made with Port Adelaide Enfield Council and Aboriginal organisations to implement and connect the Aboriginal Cultural Trail.

Another aspect of heritage relates to the listed Heritage Area within the development site.

It is listed as a Local Heritage Place # 9254 on the Heritage Register:

*"The original form of the administration building, main plant building and the garden area located between the original administration building and Frederick Road for a distance of 90m to the north and south of the original administration building..."*

Despite this Heritage listing the developer's concept plan shows they are planning to build an entry road right through the middle of the Heritage Gardens between the two Heritage listed buildings.



This plan conflicts with another part of the developer's documents. There is a developer's 'Constraints concept plan (Attachment H – Open space and urban design investigations – 4) that states:

*'Heritage buildings and heritage landscape to be retained'.*

Clearly the Heritage Area was recognised as being unable to be built upon.

We are of the understanding that there are currently planning amendments that could allow the developer to build on this Heritage Area and for Council not to 'Notify' the community that this is being planned.

There are other options for the developer to not build the road in the middle of the Heritage Area and Council should insist it isn't built on or re-zoned.

**OUTCOME 13:**

The listed Heritage Area is protected and any plan to build on it is declined notwithstanding any policy amendments that may enable a developer to apply for any such development.

**Fauna Assessment**

There has been no bio-diversity assessment conducted for any fauna at the proposed development site.

Other than removal of some trees there are parts of the site which have essentially never been developed since colonisation.

An assessment should be conducted to identify and recommend any protection measures necessary for any fauna in the site, whether they are there on a permanent or migratory basis.

**Habitat Reserve for Vulnerable Cockatoos**

The development site is a substantial habitat for the Yellow-Tailed Black Cockatoos.

These birds are threatened by habitat destruction and listed as Vulnerable in the SA National Parks & Wildlife Act, 1972 (Schedule 8).

The birds migrate annually to the site and live, breed and feed there. Their diet consists of seed cones from Pine and Sheoak trees which are abundant in the site.

The following photographs of the birds in the site were taken by a resident:



The proposed development seeks to remove trees from the site.

Removing trees from the site will have a devastating effect on the Yellow-Tailed Black Cockatoos' survival.

Some form of habitat should be left for the birds and the community is proposing that having a buffer-zone around the site's boundary, supplemented with additional trees will to some degree assist with their survival.

**OUTCOME 14:**

That a bio-diversity fauna assessment is conducted and recommendations made for the protection of any identified species.

**Flora Management**

All Significant / Regulated / Exempt trees should not be removed, as is the intent of the developer's plan and the development should be designed around them.

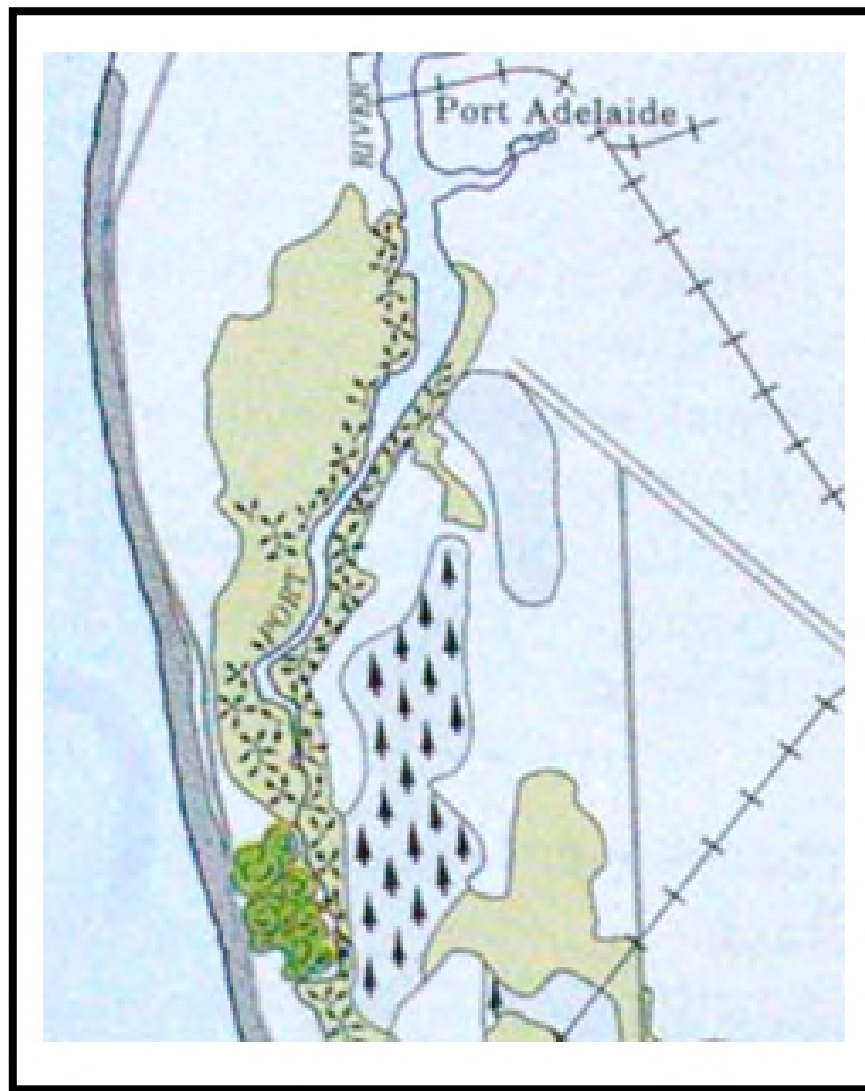
A Special Value Tree (Flora) assessment should be conducted for the development site. There is a specific definition that relates to Special Value Trees (Flora).

Special Value Trees (Flora), as it relates to this development includes:

- Remnant Vegetation and
- Flora used by threatened fauna species. (such as the Vulnerable Black Cockatoos

Any Special Value flora should be protected.

The Pinery relates to a large Pine forest that once existed alongside the Port River between Alberton and Grange as depicted below (The City of Charles Sturt - Kaurna Meyunna Cultural Mapping – A People's Living Cultural Landscape Report 2012, page 14):



Due to deforestation and development, the Pinery has all but disappeared.

In reviewing Google Maps however, it appears as though a section still exists:



The Pinery should be protected and not removed.

**OUTCOME 15:**

Flora management is undertaken to ensure:

- Significant / Regulated / Exempt trees are protected
- Flora from a Special Value Tree assessment are protected
- The Pinery is surveyed and protected

The retention of these trees also supports the Council's Tree Canopy Plan with a target of 25% of the council area by 2045.

As existing trees achieve this vision it should be remembered that this is a cheaper option than removing them and planting new trees.

Guiding Principle 3 of the Council's Strategy is to protect more trees and commit to protect them.

Removing all Significant trees and most of the remaining trees appears at odds with Council's own vision.

**OUTCOME 16:**

The Northern, Western and Southern boundaries of the development site are designated as 20 metre buffer-zones through either easements or other policy mandates. The buffer-zones will be used for noise buffering, habitat protection for Cockatoos, a cultural/historic walking/cycling trail incorporating Aboriginal Cultural markers and if needed storm-water swales.

**Traffic Issues**

The concept plan proposes one entry/exit point to the development site on Frederick Road and one on Lochside Drive.

The community knows that an additional 2,325 vehicles on Lochside Drive will increase an already congested road.

The placement of a raised medium strip on the corner of Frederick Road and Lochside Drive has prevented two cars from exiting Lochside Drive with left and right hand turns at the same time. This has slowed traffic down and caused congestion.

Other causes of congestion consist of a 1.5 metre high retainer wall at the intersection that restricts drivers from having a clear view along Frederick Road and parked cars along Lochside Drive which are all the result of the recent building development on the corner.

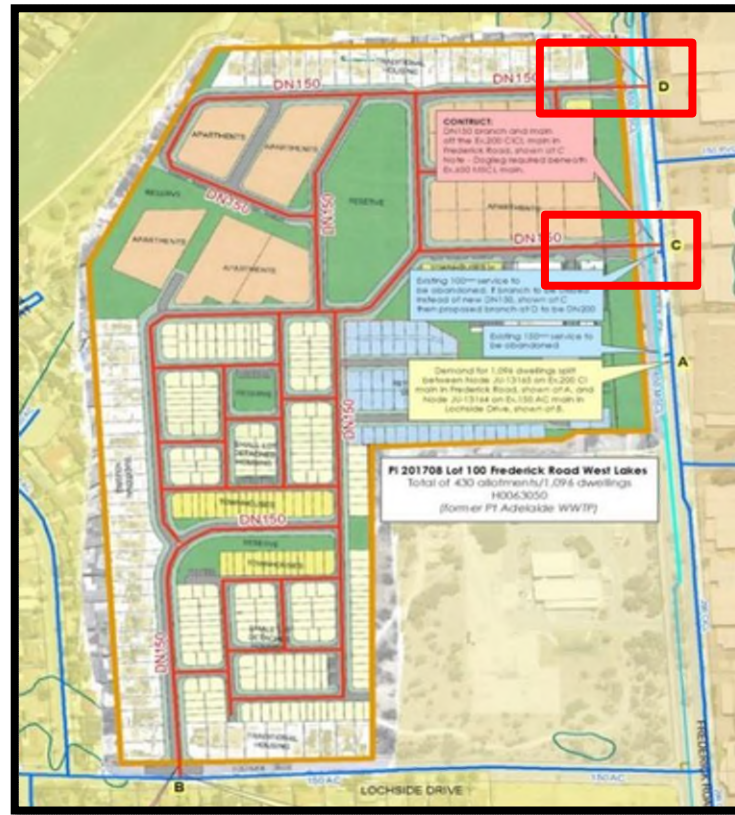
Whilst a traffic assessment was conducted, it did not mention the raised medium strip or the retainer wall obstructed the view.

The community understands that just one road entry into the development is unsuitable but believes an additional entry can be made from Frederick Road.

By having one entry in the Northern area of the site and the second at the Southern area of the site it would even out traffic management within the site and give drivers two equal options to enter and leave the site.

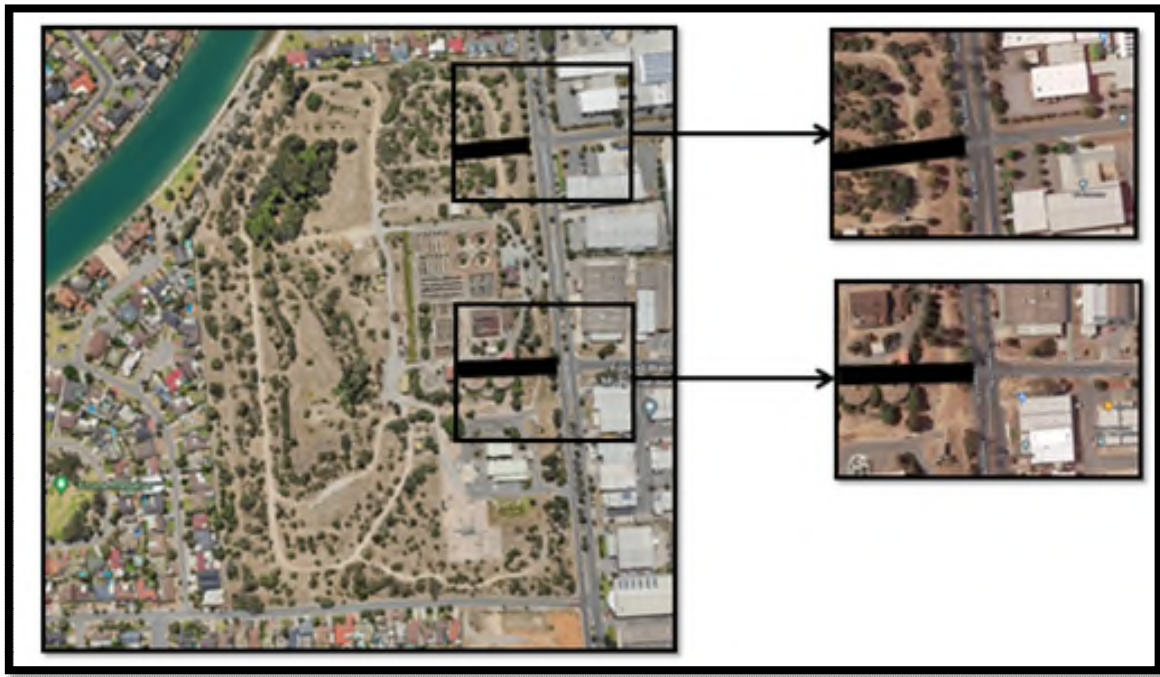
It is interesting to note that a previous failed development bid in 2017 (by another potential developer) had also considered that two entrances from Frederick Road would work.

Their concept plan is attached and the two entrances are marked with red boxes, as below:



Aligning two entrances with the existing intersections of Frederick Road / Schenker Drive and Frederick Road / Brandwood Street would make them both 'T-intersections' with traffic capable of making left and right hand turns. These possible entrances are depicted below:





There are many examples of T-intersections on busier roads such as Military and Grange Roads that have these same types of intersections and are not controlled by traffic lights or roundabouts. Even without T-intersections, there is sufficient justification to have two entrances elsewhere along the site on Frederick Road.

In considering the proposed road junction with Lochside Drive an analysis has been undertaken of the distance anyone in the proposed development would have to drive to Frederick Road in comparison with existing residents living further away.

Not having the proposed new road into Lochside Drive will not unduly affect new residents in the proposed development and will not cause the traffic congestion through an additional 2,500 vehicles.

**OUTCOME 17:**

No access / egress road is developed into Lochside Drive.

## Council Notifications Of The Proposed Code Amendment

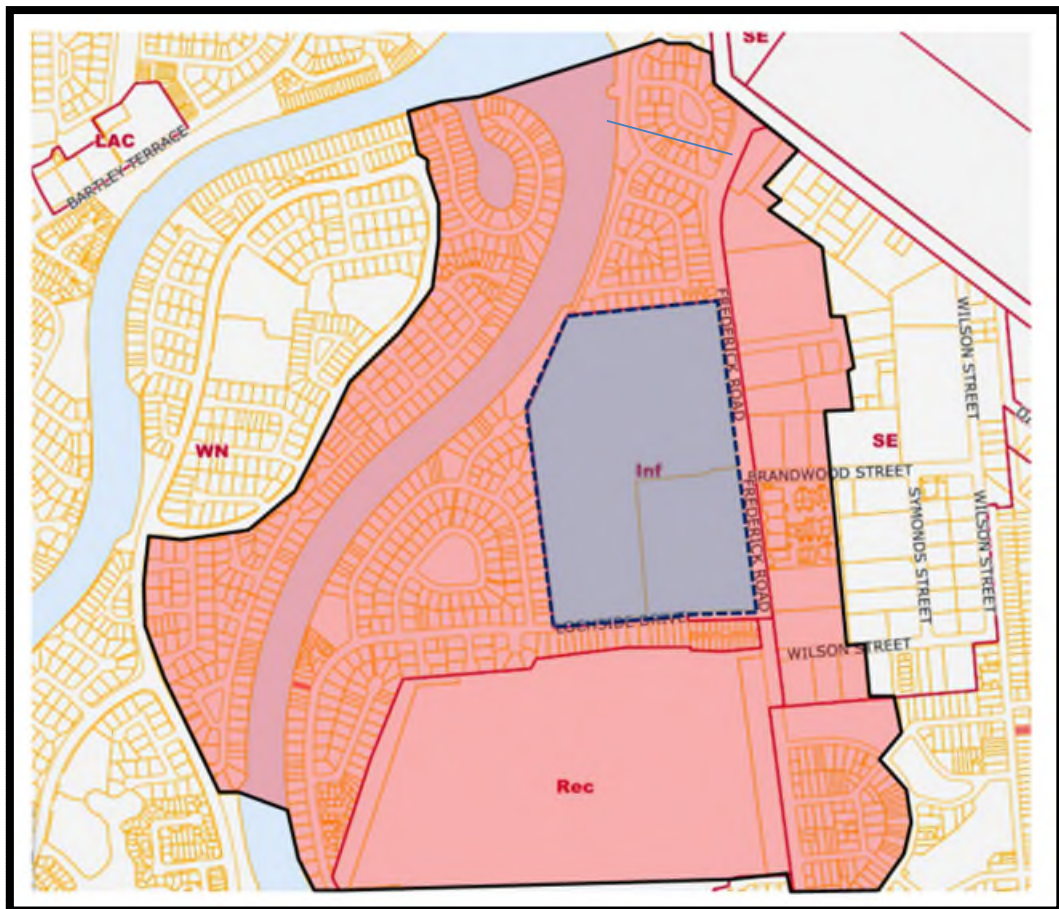
The Council posted out 950 letters to residents advising them of the community engagement process.

The letters went to some residents that either had no direct view of the development site or were so physically distanced from the site that they were not affected by the development.

It is acknowledged that Council wanted to advise as many residents as they thought affected, however those receiving letters and believing they were not affected were never going to make submissions.

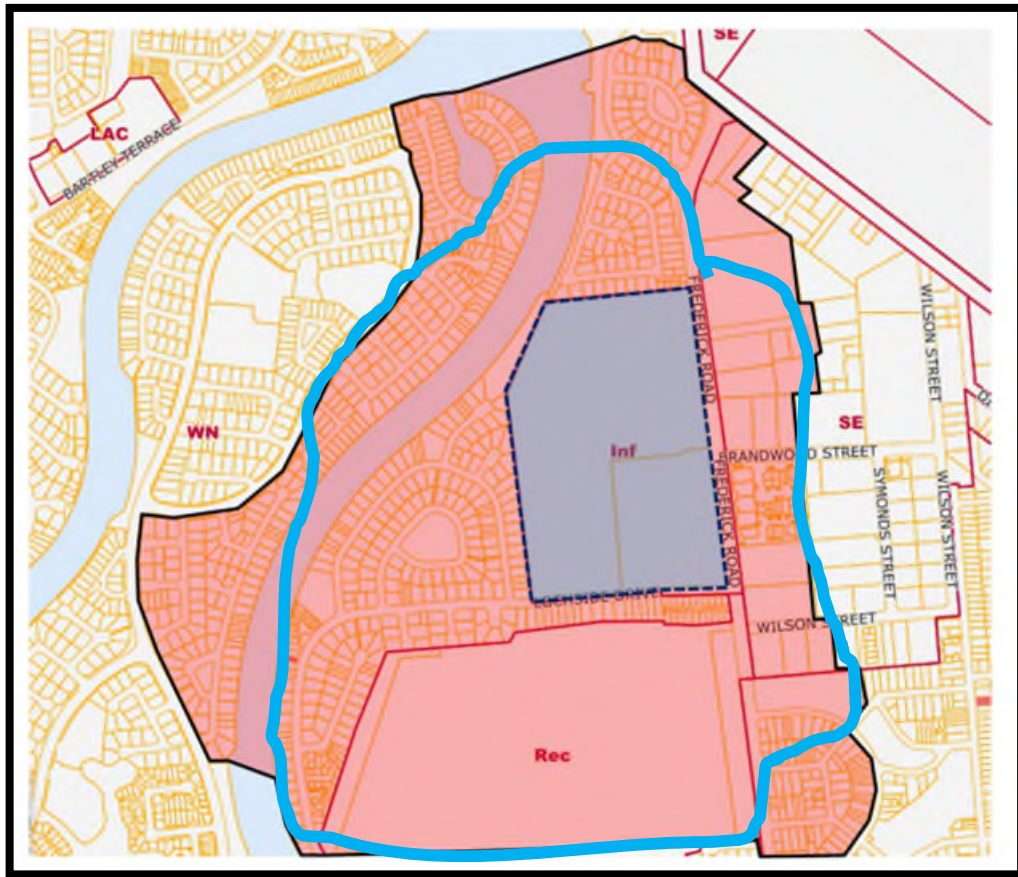
Due to the physical constraint of the Lake to the West and the Industrial area to the East of the development site, there is only a small enclave of residents who are truly affected by the proposed development. These would number approximately 500 residences.

The following diagram depicts the Council notification area:





The following diagram depicts a 'blue' line around the small enclave of affected residents:



When Council compiles results of community feedback, it will likely show a small percentage return of submissions when compared to the 950 notifications.

If the analysis was conducted on the more likely number of 500 affected residences, the return percentage would be higher and more accurate.

**OUTCOME 18:**

The percentage of returned community submissions is noted against the more relevant number of 500 residences.

## **CONCLUSION**

This submission is made on behalf of the SA Water Code Amendment Community Resident's Group (SAWCACRG).

It is based on community discussion and feedback.

The community feedback to Council on this issue is that the following zone should be applied to the proposed redevelopment:

### **Waterfront Neighbourhood Zone**

This submission has indicated why this zone should apply and why the proposed zone should not.

This submission has identified 18 'Outcomes' that Council should consider.

The Leadership Team wish to make a verbal presentation to Council after community submissions have been compiled in February 2023.

## **RECOMMENDATIONS**

1. Charles Sturt Council considers this submission and the 18 identified Outcomes.

Stephen Hammond

On behalf of:

SA Water Code Amendment Community Resident's Group (SWCACRG)  
Leadership Team

## **COMPILATION OF OUTCOMES**

The following 18 'Outcomes' have been identified in this submission for the attention of Council:

### **OUTCOME 1:**

Charles Sturt Council acknowledges the findings of the 2014 Strategic Assessment Report.

### **OUTCOME 2:**

Any proposed development at 100 and 101 Frederick Road, West Lakes, SA, 5021 does not involve the Urban Renewal Neighbourhood Zone.

### **OUTCOME 3:**

No Medium or High-density development is considered at the site until the EPA (Environmental Protection Agency) has made an assessment on soil remediation strategies required.

### **OUTCOME 4:**

A sports field, playground and water feature should be built into the development.

### **OUTCOME 5:**

No Medium or High-density development is approved within the SA Water Pump Station odour modelling zone.

**OUTCOME 6:**

Soil remediation use of capping and retainer walls is not permitted.

**OUTCOME 7:**

The proposed development at 100 Frederick Road, West Lakes, SA, 5021 (the former SA Water Waste Treatment Site) is a Waterfront Neighbourhood Zone.

**OUTCOME 8:**

The proposed development at 100 Frederick Road, West Lakes, SA, 5021 (the former SA Water Waste Treatment Site) has the same Technical and Numerical Variations (TNV) Overlays as the adjoining Waterfront Neighbourhood Zone neighbourhood.

**OUTCOME 9:**

Any proposed development at 101 Frederick Road, West Lakes, SA, 5021 (land purchased from SA Water) has the same Waterfront Neighbourhood Zone, Mixed-Use Sub Zone and Technical and Numerical Variations (TNV) restrictions as 100 Frederick Road, West Lakes and the adjoining Waterfront Neighbourhood Zone neighbourhood.

**OUTCOME 10:**

Council does not allow for any financial contribution to be paid into the Planning and Development Fund by the developer in lieu of any open space.

**OUTCOME 11:**

Council applies for a grant under the Planning and Development Fund to fund open space consisting of:

- Boundary buffer-zones
- The Pinery
- Sports Field
- Community Water Feature

**OUTCOME 12:**

That collaboration is made with Port Adelaide Enfield Council and Aboriginal organisations to implement and connect the Aboriginal Cultural Trail.

**OUTCOME 13:**

The listed Heritage Place is protected and any plan to build on it is declined despite any policy amendments that may enable a developer to apply for any such development.

**OUTCOME 14:**

That a bio-diversity fauna assessment is conducted and recommendations made for the protection of any identified species.

**OUTCOME 15:**

Flora management is undertaken to ensure:

- Significant / Regulated / Exempt trees are protected
- Flora from a Special Value Tree assessment are protected
- The Pinery is surveyed and protected

**OUTCOME 16:**

The Northern, Western and Southern boundaries of the development site are designated as 20 metre buffer-zones through either easements or other policy mandates. The buffer-zones will be used for noise buffering, habitat protection for Cockatoos, a cultural/historic walking/cycling trail incorporating Aboriginal Cultural markers and if needed storm-water swales.

**OUTCOME 17:**

No access / egress road is developed into Lochside Drive.

**OUTCOME 18:**

The percentage of returned community submissions is noted against the more relevant number of 500 residences.

Submission 130

**Archived:** Monday, 21 November 2022 10:10:22 AM  
**From:** [Bob Nicol](#)  
**Sent:** Sunday, 20 November 2022 1:37:25 PM  
**To:** [Jim Gronthos](#)  
**Cc:** [REDACTED]  
**Subject:** West Lakes Residential Mixed Use Draft Code Amendment  
**Importance:** Normal  
**Sensitivity:** None

---

Dear Mr Gronthos,

*I want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.*

*Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.*

*There should be no high-rise towers built that will change the character of the neighbourhood.*

*As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.*

*The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.*

*Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.*

*The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.*

*There should be no new road access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road.*

*There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.*



*There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.*

*The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.*

*This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.*

*As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area. It is also a known burial location, and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building up until approximately 1999.*

*I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.*

*There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.*

*Relevant Aboriginal organisations, such as the Kurna Yerti Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.*

*Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.*

*All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.*

*The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.*

*The development should include a suitable sized water feature and fountains.*

*A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.*

*Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.*

*Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.*

*The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.*

*A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.*

*My main issues are summarised in the following Dot-Points:*

***The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)***

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

***The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone***

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood zoning

***Buffer-Zones around the site Boundary***

Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks

Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

***No Traffic Access to Lochside Drive***

Traffic Chaos - Have 2 roads from Frederick Road into the development

***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too far

***Tree Management***

Significant / Regulated / Exempt trees to remain  
A Special Value Tree Assessment must be conducted

## Habitat Reserve for Vulnerable Cockatoos

The Yellow-Tailed Black Cockatoos needs protection  
The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

## Heritage Recognition

Heritage Gardens to be maintained, no road through it and not re-zoned  
The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

***Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted***

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

***No Financial Contribution in lieu of actual Open Space***

Open Space to include Buffer Zones - Community Sports Field  
Water Feature - the PINERY

### ***Black Swan Event***

The failure of the FTX crypto currency exchange, which is being likened to the failure of Lehman Brothers, means the likelihood of a repeat of the Global Financial Crisis of 2008.

This failure of FTX is already causing financial problems which are spreading around the world. Adding this failure to other pressures will mean a Global recession with financing of projects becoming more difficult for several years.

With interest rates rising, building material costs increasing and inflation, it is imperative for the Council, SA Water and the South Australian Government to ensure that any developer has the financial capacity to complete their development plans.

Delfin Limited, the original developer of West Lakes and West Lakes Shore developed the two suburbs to world class standards by completing infrastructure and then selling land plots only, in a staged manner, which then sold effortlessly and with minimum financial risk.

In the current financial climate there is increased risk of developers and builders failing, leaving incomplete works and infrastructure which will then require remedial works at substantial costs to the Community including Council and SA Government which could have been avoided.

A development which incorporates all the matters mentioned above is, financially, far safer than that proposed by the Developer.

Yours faithfully,

Bob Nicol

■ Hawaii Court, West Lakes SA 5021

Tel No.

Email Address –

20 November 2022

## Submission 131

Archived: Monday, 21 November 2022 10:18:43 AM

From: [REDACTED]

Sent: Sunday, 20 November 2022 4:27:41 PM

To: [Jim Gronthos](#)

Subject: FW: West Lakes Residential Mixed Use Draft Code Amendment

Importance: Normal

Sensitivity: None

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From: [REDACTED]

Sent: Sunday, 20 November 2022 4:15 PM

To: 'jgronthos@charlessturt.sa.gov.au' <jgronthos@charlessturt.sa.gov.au>; [REDACTED]

[REDACTED]

Subject: FW: West Lakes Residential Mixed Use Draft Code Amendment

Dear Mr Gronthos,

*I want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.*

*Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.*

*There should be no high-rise towers built that will change the character of the neighbourhood.*

*As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.*

*The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.*

*Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.*

*The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.*

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*This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.*

*As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area. It is also a known burial location, and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building up until approximately 1999.*

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*Relevant Aboriginal organisations, such as the Kaurna Yerti Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.*

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Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks

Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

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Traffic Chaos - Have 2 roads from Frederick Road into the development

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Families have to play somewhere - 1km to the nearest sportsground is too far

### ***Tree Management***

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The Yellow-Tailed Black Cockatoos needs protection

The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

### ***Heritage Recognition***

Heritage Gardens to be maintained, no road through it and not re-zoned

The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

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Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

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Water Feature - the PINERY

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around the world. Adding this failure to other pressures will mean a Global recession with financing of projects becoming more difficult for several years. With interest rates rising, building material costs increasing and inflation, it is imperative for the Council, SA Water and the South Australian Government to ensure that any developer has the financial capacity to complete their development plans.

Delfin Limited, the original developer of West Lakes and West Lakes Shore developed the two suburbs to world class standards by completing infrastructure and then selling land plots only, in a staged manner, which then sold effortlessly and with minimum financial risk.

In the current financial climate there is increased risk of developers and builders failing, leaving incomplete works and infrastructure which will then require remedial works at substantial costs to the Community including Council and SA Government which could have been avoided.

A development which incorporates all the matters mentioned above is, financially, far safer than that proposed by the Developer.

## **HOUSEWIFE'S VIEWPOINT**

We have lived in our house for twenty years, it took us five years of searching for the right place to buy. West Lakes was an absolutely beautiful place to live, the surrounding areas absolutely perfect for a growing family. Opposite us is an absolutely beautiful reserve on the lakefront, where people jog, walk their children in prams, others ride their bicycles. Just behind the reserve area is a picture of the magnificent row of pine trees, which house plenty of gorgeous black crows, who present me with their newborn chicks each year, possibly because I feed them ☐ I am saddened by the redevelopment of West Lakes by WEST as the whole area has lost its openness and appeal as being a lovely suburb to live in. It's become a quagmire of little (not even attractive) boxes, certainly over-developed, and would you believe it, they are still building more apartment blocks. The Boom Gates, well, they are an absolute joke – having to pay to enjoy the services of your own shopping centre. No doubt money was a huge incentive there.

My request would be that you leave the reserve alone, and also the beautiful line of Pine trees....oh you may decide to leave some, however, I have the feeling that you will get as close to the lake as possible, why, because you can ensure the purchaser would ask more for the property (blocks) when they sell them. I am greatly opposed to any high development on the site, to spoil the view, certainly not five or more levels. The area, would become a nightmare traffic wise, it is already becoming that way on the Boulevard already, just look at how difficult it is now with congestion at the two entrances/exits from Delfin Island and at Bartley Terrace, next thing needed will be roundabouts or traffic lights. The same would obviously occur at both entrances to Lochside Drive and Frederick Road. As mentioned previously, public transport would

Another reason, no matter what they say will be done regarding the soil at present on the land, THE SOIL IS CONTAMINATED nothing except removing every inch of the current soil and replacing it will make it safe. The soil on Delfin Island was looked at, remedial measures taken but we will never be able to grow SAFE fruit or vegetables, on this land. Therefore, I cannot see that the soil on the land in question, will be any safer than ours on Delfin Island.

Grossly unfair in my opinion therefore, every precaution should be taken to ensure that when a development does get approval, it should be of the highest standard possible, so that nearby residents can have nothing but praise for it.

Kind regards,

Hawaii Court, West Lakes SA 5021

Tel No.

Email Address

20 November 2022

Submission 132

**Archived:** Monday, 21 November 2022 11:40:25 AM

**From:** [steve townsend](#)

**Sent:** Monday, 21 November 2022 11:36:13 AM

**To:** [Jim Gronthos](#)

**Cc:** [REDACTED]

**Subject:** West Lakes Residential Mixed Use Draft Code Amendment

**Importance:** Normal

**Sensitivity:** None

---

Good afternoon Jim

My name is Stephen Townsend of [REDACTED] Lochside Drive West Lakes. I have resided at the address for over twenty years. This submission is also on behalf of my sons Lachlan ([REDACTED] years old) and Curtis ([REDACTED] years old).

I, and my young family want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.

Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.

There should be no high-rise towers built that will change the character of the neighbourhood.

As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.

The site is **NOT** in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should **NOT** apply.

Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.

The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.

There should be no new road access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road. The Lochside Drive Frederick Road intersection is already dangerous, due residents of that "medium density" development utilising street parking. Lochside Drive would be even more

dangerous with the substantial increase in vehicle traffic and parking on both sides of the road.

There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.

There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.

The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kaurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kaurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.

This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.

All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.

The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.

The development should include a suitable sized water feature and fountains.

**A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.**

Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.

Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.

The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.

A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.

My main issues are summarised in the following Dot-Points:

## **The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)**

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

## **The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone**

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood zoning

### **Buffer-Zones around the site Boundary**

Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking track  
Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

### ***No Traffic Access to Lochside Drive***

Traffic Chaos - Have 2 roads from Frederick Road into the development

### ***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too far

### ***Tree Management***

Significant / Regulated / Exempt trees to remain  
A Special Value Tree Assessment must be conducted

### ***Habitat Reserve for Vulnerable Cockatoos***

The Yellow-Tailed Black Cockatoos needs protection  
The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

### ***Heritage Recognition***

Heritage Gardens to be maintained, no road through it and not re-zoned  
The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

### ***Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted***

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

### ***No Financial Contribution in lieu of actual Open Space***



Open Space to include Buffer Zones - Community Sports Field  
Water Feature - the PINERY

Kind regards

Stephen Townsend



Submission 133

**Archived:** Monday, 21 November 2022 3:00:09 PM

**From:** [steve townsend](#)

**Sent:** Monday, 21 November 2022 2:34:40 PM

**To:** [Jim Gronthos](#)

**Cc:** [REDACTED]

**Subject:** West Lakes Residential Mixed Use Draft Code Amendment

**Importance:** Normal

**Sensitivity:** None

---

Good afternoon Jim

I reside at [REDACTED] Lochside Drive West Lakes, with my husband and two boys.

I, and my young family want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.

Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.

There should be no high-rise towers built that will change the character of the neighbourhood.

As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.

The site is **NOT** in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should **NOT** apply.

Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.

The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.

There should be no new road access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road. The Lochside Drive Frederick Road intersection is already dangerous, due residents of that "medium density" development utilising street parking. Lochside Drive would be even more

dangerous with the substantial increase in vehicle traffic and parking on both sides of the road.

There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.

There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.

The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kaurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kaurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.

This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.

All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.

The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.

The development should include a suitable sized water feature and fountains.

**A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.**

Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.

Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.

The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.

A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.

My main issues are summarised in the following Dot-Points:

## **The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)**

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

## **The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone**

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood zoning

### **Buffer-Zones around the site Boundary**

Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking track  
Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

### ***No Traffic Access to Lochside Drive***

Traffic Chaos - Have 2 roads from Frederick Road into the development

### ***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too far

### ***Tree Management***

Significant / Regulated / Exempt trees to remain  
A Special Value Tree Assessment must be conducted

### ***Habitat Reserve for Vulnerable Cockatoos***

The Yellow-Tailed Black Cockatoos needs protection  
The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

### ***Heritage Recognition***

Heritage Gardens to be maintained, no road through it and not re-zoned  
The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

### ***Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted***

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

### ***No Financial Contribution in lieu of actual Open Space***

Open Space to include Buffer Zones - Community Sports Field  
Water Feature - the PINERY

Kind regards

Belinda Dzido



Submission 134

**Archived:** Monday, 21 November 2022 3:56:44 PM

**From:** [a s](#)

**Sent:** Sun, 20 Nov 2022 19:24:02

**To:** [City of Charles Sturt](#)

**Subject:** Opinion For Development Plan On The Corner Of Frederick Road & Lochside Drive

**Importance:** Normal

**Sensitivity:** None

---

To Whom It May Concern,

I'm the house owner of ■ Leith Price Court, West Lakes 5021.

Regarding to the new development planned for the former SA Water Treatment Plant on the corner of Frederick Road and Lochside Drive, I'd like to express that I'm opposing this development plan as it will bring so many extra cars a day in the area, it will cause traffic chaos.

This is very concerning and I'm sure many other residents are worried too. Please take our opinions and concern into consideration and stop the development plan.

Thank you for your help and attention.

Kind Regards,  
Chris



Submission 135

**Archived:** Monday, 21 November 2022 4:32:12 PM

**From:** [Bulldog](#)

**Sent:** Mon, 21 Nov 2022 15:33:23

**To:** [Jim Gronthos](#)

**Cc:** [REDACTED]

**Subject:** West Lakes Residential Mixed Use Draft Code Amendment

**Importance:** Normal

**Sensitivity:** None

---

Hi Jim Gronthos,

I have been a resident in the West Lakes area since 1975, firstly we built [REDACTED] Georgia Avenue, West Lakes Grange and then 1981, [REDACTED] Driver Court, West Lakes. Driver Court is connected to Lochside Drive which we use to connect to Frederick Road, mainly at the Northern, SA Water Treatment site. We have raised 3 children, one of which lives on Lochside Drive with his wife and 2 school aged children.

Our decision to build and live in West Lakes with its Encumbrances, quality of environment and raise our Family and Grandchildren is the best we have made in our lifetime.

Please don't destroy it for initially extra money but increased problems and extra cost.

I do not support the **West Lakes Residential and Mixed Use Draft Code Amendment** that the Charles Sturt Council posted to my address.

I do not support access to Lochside Drive for the very high number of vehicles that would result from approval of this Concept Plan X, West Lakes.

We are already experiencing large increases in residents, vehicles, visitors, kerbside parking as existing house blocks are being divided in to 2 and replaced with 2 storey homes.

I do not support 4 or higher storey apartment blocks/buildings in this concept. The storm water given off by these buildings would be very high

I do not support this area as being suitable for a high density Bowden type development.

Re Lot 10I, I feel SA Water who is responsible for the soil contamination should maintain the surface as soft landscaping with suitable native vegetation for native bird life and small creatures etc.

I think the Date Palms should remain along Frederick Road in keeping with the Old Port Road and Commercial Road.

I have copied the unanimous approval submission from the meeting held in St. Bedes, Semaphore which I attended.

I support the points made in varying priorities. I do not support any Re-Zoning that would end up with the Concept Plan X etc.

*"I want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.*

*Technical and Numerical Variations relating to heights of buildings, etc, should be the same*

*as the existing neighbourhood.*

*There should be no high-rise towers built that will change the character of the neighbourhood.*

*As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.*

*The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.*

*Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.*

*The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.*

*There should be no new road access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road.*

*There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.*

*There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.*

*The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kaurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kaurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.*

*This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.*

*As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished*

*and hunted in the area. It is also a known burial location, and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building up until approximately 1999.*

*I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.*

*There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.*

*Relevant Aboriginal organisations, such as the Kaurna Yerti Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.*

*Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.*

*All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.*

*The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.*

*The development should include a suitable sized water feature and fountains.*

*A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.*

*Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.*

*Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.*

*The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.*

*A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.*

*My main issues are summarised in the following Dot-Points:*

***The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)***

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

***The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone***

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood zoning

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Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

***No Traffic Access to Lochside Drive***

Traffic Chaos - Have 2 roads from Frederick Road into the development

***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too far

***Tree Management***

Significant / Regulated / Exempt trees to remain

A Special Value Tree Assessment must be conducted

***Habitat Reserve for Vulnerable Cockatoos***

The Yellow-Tailed Black Cockatoos needs protection

The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

***Heritage Recognition***

Heritage Gardens to be maintained, no road through it and not re-zoned

The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

***Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted***

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

***No Financial Contribution in lieu of actual Open Space***

Open Space to include Buffer Zones - Community Sports Field  
Water Feature - the PINERY

Yours sincerely

Bruce Townsend

Ph 

Submission 136

**Archived:** Monday, 21 November 2022 4:36:19 PM

**From:** [REDACTED]

**Sent:** Monday, 21 November 2022 4:11:05 PM

**To:** [Jim Gronthos](#)

**Subject:** FW: SA Water Site Submission

**Importance:** Normal

**Sensitivity:** None

---

To Whom it may concern,

This is an email that my wife wanted to put together. After working by my side for many years, she is well aware on how the whole development process works.....!

As there are already existing homes on all 3 boundaries of the site, a multi-storey jungle is not what we need to see in our back yards.

The more homes the developer can get on, the more they will pay for the site, the more Rates and Taxes you can charge. And that's a bonus for the SA Government and Councils..!

The SA Water site should be cut up into decent size allotments for young families to build their dream homes, people who have been living in and around the area ever since West Lakes was developed, wanting to downsize to see out the rest of their lives and most importantly keep it in the balance of the whole area.

Let's talk about the **"West"** development...!

That was a site that had NO existing housing on any boundaries, so therefore residences never really knew what was actually proposed for the site. I attended the launch of the development, and I should have kept all the proposed plans that were given to us. So let me tell you that there has been lots of changes since they first released that development. Just an ongoing eyesore. So, the "West Development" is a 10-year development. I had a chat from "West" today and they have advised me that they have no properties left to Sell, but plenty of Multistorey apartments to be erected in the coming years. Again, the residents have to put up with the noise, dust, congested roads, all in the name of the developer making more money. **Don't flood the market they say, or prices will fall..!**

Parking is an ongoing saga and is that bad, that you can't even get into your own property. That's what I call **"over development" ..!**

The "WEST" development had basically everything there, Shopping Centre, Transport, Community hub, 2 arterial roads, Parks, and they still couldn't get it right. An absolute concrete jungle, ramming as many dwellings as they can..! This is the residents fear with the SA Water Site..! It will definitely change once the developer get what they want. Now, there are too many shops, offices etc. and you want to add more. Just doesn't make sense..! I could mention many other sites where this has happened.

I have been involved in Real Estate for over a decade and I have seen many developments that have been given the green light by the State Government, Councils etc. that haven't worked, but once the green light has been given, it's all too late. So again, the "Developers Win" and the residents must put up with it, causing stress, anxiety, and worrying about their wellbeing, which is not needed with what's happening in life today..!

Everyone forgets about that..!

We are simple people trying to live a balanced life, paying our taxers..!

Developers come and go like locusts, eating as much as they can on their way through to the next site.

**The Council has not given the residents of West Lakes a good enough reason why this site should change zoning...!**

**"WATERFRONT NEIGHBOURHOOD ZONING" is the only way to go..!**

A very frustrating situation..!

Kind regards

Gianna Finis  
[REDACTED]



Thank you  
Kind Regards

Larry Finis  
[Redacted]

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**Belle Property West Lakes | (08) 8353 1400**  
Suite 75/155 Brebner Drive West Lakes S.A 5021  
[belleproperty.com/westlakes](http://belleproperty.com/westlakes)

Facebook | LinkedIn | Youtube | Instagram

The Belle Property logo features a dark green square with a white vertical bar on the left. To the right of the bar, the word "belle" is written in a large, white, lowercase sans-serif font, and the word "PROPERTY" is written in a smaller, white, uppercase sans-serif font below it.

Read the latest  
issue of Sitchu  
Living magazine

[View iMag](#)

The cover of the Sitchu Living magazine shows a modern interior with a wooden dining table and chairs. The title "SITCHU LIVING" is at the top.

---

The information in this e-mail may be confidential and/or legally privileged. If you are not the intended recipient, access to it is unauthorised and any disclosure, copying, distribution or action taken or omitted to be taken in reliance on it is prohibited and may be unlawful.

## Submission 137

**Archived:** Monday, 21 November 2022 4:42:50 PM

**From:** [noreply@charlessturt.sa.gov.au](mailto:noreply@charlessturt.sa.gov.au)

**Sent:** Mon, 21 Nov 2022 05:46:15

**To:** [Jim Gronthos](#)

**Subject:** West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

**Importance:** Normal

**Sensitivity:** None

---



## West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

There has been a submission of the form West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form through your Your Say Charles Sturt website.

**Customer type?**

Member of the public

**First Name**

Ryan

**Last Name**

Stewart

**Organisation (if relevant)**

Broadway Property Advisory

**Email Address**

[REDACTED]

**Postal Address**

[REDACTED] Grenfell Street Adelaide

**Phone Number**

[REDACTED]

**Your Submission on the West Lakes Residential and Mixed Use Draft Code Amendment**

I believe that the proposed activation of this dormant site releases benefits for the broader community through Residential supply and the potential for outcomes such as Child Care, Retirement Living, Service Based Retail and has to opportunity for the supply of some affordable housing outcomes.

I am fully supportive of this Code Amendment.

**Do you wish to make a verbal submission at the Public Meeting to be held in February 2023 (date and time to be confirmed) at the Civic Centre, 72 Woodville Road, Woodville?**

No

To view all of this form's submissions, visit

[https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms\\_new/data/706](https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms_new/data/706)

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Your Say Charles Sturt.

## Submission 138

# SUBMISSION FORM

Urban Projects



## West Lakes Residential and Mixed Use Draft Code Amendment

The City of Charles Sturt is inviting submissions on the West Lakes Residential and Mixed Use Draft Code Amendment (Privately Funded).

Consultation closes at 5.00pm on Thursday 24 November 2022.

### Tell us your thoughts!

To provide your feedback please do **ONE (1)** of the following:

- Complete this hardcopy submission form.

OR

- Complete the ONLINE feedback form at:  
[yoursaycharlessturt.com.au/west-lakes-code-amendment](https://yoursaycharlessturt.com.au/west-lakes-code-amendment)

### Your Details

Please provide your name or organisation and email address should we need to contact you regarding your feedback. (By completing this form, you consent to the City of Charles Sturt collecting, retaining and using the personal information provided by you in line with Council's Privacy Policy)

Name: MRS Dionne Robertson  
(Mr/Mrs/Miss/Ms/Dr) (First Name) (Surname)

Organisation (if relevant): \_\_\_\_\_

Address: Mc Donald Grove, West Lakes

Suburb: \_\_\_\_\_ State: SA P/Code: 5021

Email: \_\_\_\_\_

Phone Home: \_\_\_\_\_ Mobile: \_\_\_\_\_

### Your Submission

#### 1. Customer type? (tick one)

- ☒ Member of the public
- ☐ Council
- ☐ Agency
- ☐ Other (please specify) \_\_\_\_\_

#### 2. Your submission on the West Lakes Residential and Mixed Use Draft Code Amendment:

I ~~have~~ do not agree with the proposed develop-  
-ment at the old sewerage treatment plant.  
There are too many dwellings and therefore  
too many vehicles for the area of housing.  
It will create congestion, road hazards and

2. Your submission, continued:

devalue the properties in the Charles Sturt Council,

There are currently not enough vacancies in the ~~charles~~ local area schools to provide places for new students. If the building has room for 500 to 1000 families the local infrastructure - school, churches, sanitation, roads, will not cope.

~~These~~ They are doing too big a development and not considering the infrastructure damage.

3. Do you wish to make a verbal submission at the Public Meeting to be held in February 2023 (date and time to be confirmed) at the Civic Centre, 72 Woodville Road, Woodville? (tick one)

- ☒ Yes  
☐ No

— if support needed contact me.

Please provide your feedback to Council by 5.00pm on Thursday 24 November 2022, addressed to the Chief Executive Officer, City of Charles Sturt, PO Box 1, Woodville SA 5011.

Thank you for taking the time to complete this feedback form.  
To keep up to date with the progress of this proposal and Council's consultation projects generally visit  
[yoursaycharlessturt.com.au](http://yoursaycharlessturt.com.au)

## Submission 139



**Archived:** Monday, 21 November 2022 4:58:30 PM

**From:** [Ann-marie Bryant](#)

**Sent:** Mon, 21 Nov 2022 16:47:58

**To:** [Jim Gronthos](#)

**Cc:** [REDACTED]

**Subject:** West Lakes Residential Mixed Use Draft Code Amendment

**Importance:** Normal

**Sensitivity:** None

---

*To whom it may concern,*

*My name is Ann-marie Bryant and i live at [REDACTED] Lakeviewave West Lakes my phone number is [REDACTED]*

*"I want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.*

*Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.*

*There should be no high-rise towers built that will change the character of the neighbourhood.*

*As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.*

*The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.*

*Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.*

*The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.*

*There should be no newroad access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road.*

*There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.*

*There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.*

*The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kaurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kaurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.*

*This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.*

*As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area. It is also a known burial location, and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building up until approximately 1999.*

*I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.*

*There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.*

*Relevant Aboriginal organisations, such as the Kaurna Yerti Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.*

*Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.*

*All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.*

*The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.*

*The development should include a suitable sized water feature and fountains.*

*A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.*

*Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.*

*Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.*

*The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.*

*A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.*

*My main issues are summarised in the following Dot-Points:*

***The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)***

*1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood*

***The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone***

*The area does not fit the guidelines for approval of this zone.*

*No Technical & Numerical Variations different to existing neighbourhood zoning*

***Buffer-Zones around the site Boundary***

*Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks*

*Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)*

### ***No Traffic Access to Lochside Drive***

Traffic Chaos - Have 2 roads from Frederick Road into the development

### ***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too far

### ***Tree Management***

Significant / Regulated / Exempt trees to remain

A Special Value Tree Assessment must be conducted

### ***Habitat Reserve for Vulnerable Cockatoos***

The Yellow-Tailed Black Cockatoos needs protection

The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

### ***Heritage Recognition***

Heritage Gardens to be maintained, no road through it and not re-zoned

The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

### ***Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted***

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

### ***No Financial Contribution in lieu of actual Open Space***

Open Space to include Buffer Zones - Community Sports Field

Water Feature - the PINERY

*Regards Ann-marie Bryant*

## Submission 140

**Archived:** Tuesday, 22 November 2022 9:58:08 AM

**From:** [noreply@charlessturt.sa.gov.au](mailto:noreply@charlessturt.sa.gov.au)

**Sent:** Mon, 21 Nov 2022 07:37:08

**To:** [Jim Gronthos](#)

**Subject:** West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

**Importance:** Normal

**Sensitivity:** None

---



## West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

There has been a submission of the form West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form through your Your Say Charles Sturt website.

**Customer type?**

Member of the public

**First Name**

Andrew

**Last Name**

Zammit

**Organisation (if relevant)**

N/A

**Email Address**

[REDACTED]

**Postal Address**

[REDACTED] Lorraine Ave Lockleys SA

**Phone Number**

[REDACTED]

**Your Submission on the West Lakes Residential and Mixed Use Draft Code Amendment**

This is an important piece of land to create new residential accommodation opportunities.

Looking forward to Council and community support to bring this to fruition.

**Do you wish to make a verbal submission at the Public Meeting to be held in February 2023 (date and time to be confirmed) at the Civic Centre, 72 Woodville Road, Woodville?**

No

To view all of this form's submissions, visit

[https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms\\_new/data/706](https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms_new/data/706)

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Your Say Charles Sturt.

Submission 141



**Archived:** Tuesday, 22 November 2022 10:03:48 AM

**From:** [noreply@charlessturt.sa.gov.au](mailto:noreply@charlessturt.sa.gov.au)

**Sent:** Mon, 21 Nov 2022 07:55:13

**To:** [Jim Gronthos](#)

**Subject:** West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

**Importance:** Normal

**Sensitivity:** None

---



## West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

There has been a submission of the form West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form through your Your Say Charles Sturt website.

**Customer type?**

Member of the public

**First Name**

Jamie

**Last Name**

Guerra

**Organisation (if relevant)**

Leedwell

**Email Address**

[REDACTED]

**Postal Address**

[REDACTED] Greenhill Road Unley SA 5061

**Phone Number**

[REDACTED]

**Your Submission on the West Lakes Residential and Mixed Use Draft  
Code Amendment**

I am supportive of activating this dormant site, connecting the West Lakes foreshore further via walking paths. The residential and retail design appears consistent with West development

**Do you wish to make a verbal submission at the Public Meeting to be held in February 2023 (date and time to be confirmed) at the Civic Centre, 72 Woodville Road, Woodville?**

No

To view all of this form's submissions, visit

[https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms\\_new/data/706](https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms_new/data/706)

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Your Say Charles Sturt.

Submission 142

**Archived:** Tuesday, 22 November 2022 10:18:03 AM

**From:** [Okulewicz, Isabella \(School SA\)](#)

**Sent:** Monday, 21 November 2022 6:46:45 PM

**To:** [Jim Gronthos](#)

**Cc:** [REDACTED]

**Subject:** West Lakes Residential Mixed Use Draft Code Amendment

**Importance:** High

**Sensitivity:** None

---

To whom it may concern

My name is Isabella Okulewicz , I live at [REDACTED] lakeview ave Westlake's. My Ph is [REDACTED]

*"I want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neigourhood.*

*Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.*

*There should be no high-rise towers built that will change the character of the neighbourhood.*

*As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.*

*The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.*

*Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.*

*The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.*

*There should be no new road access into Lochside Drive (or any other surrounding street) as*

*it will cause traffic chaos. There should be two roads from the development onto Frederick Road.*

*There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.*

*There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.*

*The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.*

*This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.*

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*There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.*

*Relevant Aboriginal organisations, such as the Kurna Yerti Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.*

*Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.*

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*identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.*

*The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.*

*The development should include a suitable sized water feature and fountains.*

*A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.*

*Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.*

*Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.*

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*My main issues are summarised in the following Dot-Points:*

***The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)***

*1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood*

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*Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks*

*Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)*

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***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too far

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A Special Value Tree Assessment must be conducted

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The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

***Heritage Recognition***

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The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

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Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

***No Financial Contribution in lieu of actual Open Space***

Open Space to include Buffer Zones - Community Sports Field  
Water Feature - the PINERY

Regards Isabella Okulewicz

**Archived:** Tuesday, 22 November 2022 10:18:19 AM

**From:** [Okulewicz, Isabella \(School SA\)](#)

**Sent:** Mon, 21 Nov 2022 16:35:56

**To:** [Jim Gronthos](#)

**Cc:** [REDACTED]

**Importance:** Normal

**Sensitivity:** None

---

To whom it may concern

My name is Isabella Okulewicz , I live at [REDACTED] lakeview ave Westlake's. My Ph is [REDACTED]

*"I want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neigourhood.*

*Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.*

*There should be no high-rise towers built that will change the character of the neighbourhood.*

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*There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.*

*There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.*

*The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kaurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kaurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.*

*This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.*

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*I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.*

*There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.*

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*The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.*

*The development should include a suitable sized water feature and fountains.*

*A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.*

*Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.*

*Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.*

*The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.*

*A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.*

*My main issues are summarised in the following Dot-Points:*

***The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)***

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

***The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone***

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood zoning

***Buffer-Zones around the site Boundary***

Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks

Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

***No Traffic Access to Lochside Drive***

Traffic Chaos - Have 2 roads from Frederick Road into the development

***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too far

### ***Tree Management***

Significant / Regulated / Exempt trees to remain  
A Special Value Tree Assessment must be conducted

### ***Habitat Reserve for Vulnerable Cockatoos***

The Yellow-Tailed Black Cockatoos needs protection  
The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

### ***Heritage Recognition***

Heritage Gardens to be maintained, no road through it and not re-zoned  
The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

### ***Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted***

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

### ***No Financial Contribution in lieu of actual Open Space***

Open Space to include Buffer Zones - Community Sports Field  
Water Feature - the PINERY

Regards Isabella Okulewicz

Submission 143

Archived: Tuesday, 22 November 2022 10:36:25 AM

From: [REDACTED]

Sent: Mon, 21 Nov 2022 22:06:54

To: [Jim Gronthos](#)

Cc: [REDACTED]  
[REDACTED]  
[REDACTED]

Subject: West Lakes Residential Mixed Use Draft Code Amendment

Importance: Normal

Sensitivity: None

---

Dear Mr Gronthos

I want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.

Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.

There should be no high-rise towers built that will change the character of the neighbourhood.

As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.

The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.

Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.

The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.

There should **be no new road access into Lochside Drive** (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road. This is imperative. There is absolutely no need for an entrance off Lochside Drive into the new development. The residents living in the middle of Lochside Drive and the streets branching off it will be severely impacted by having to deal with unnecessary traffic impediments. Frederick Road is a main road, there should only be access to the new development from Frederick Road. There is enough scope on the site to accommodate this proposal.

Further, the development should ensure that there is **enough car park spacing for at least two vehicles per household** proposed in the development, **plus visitor car park spacing**.

This should occur whether the resident's wishes are heard or not relating to the proposed re-zoning. If there are not enough car park spaces within the development itself for residents and guests, there will be nothing but chaos on Lochside Drive and Frederick Road itself and the flow of traffic will be damaged. Almost every household has more than one vehicle, just because people are buying an apartment, does not mean they do not have two vehicles. It is irresponsible to allow a development of such size to be built without recognising this fact, especially considering the nature of the public transport system in South Australia. There are just not sufficient public transport options for people to use as an alternative to driving. Families will generally have two vehicles. This should be an absolute must for any development.

There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.

There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.

The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.

This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.

As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area. It is also a known burial location, and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building up until approximately 1999.

I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.

There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.

Relevant Aboriginal organisations, such as the Kurna Yerta Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.

Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.

All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.

The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.

The development should include a suitable sized water feature and fountains.

A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs. There is an opportunity for the Council to incorporate a green initiative in the development, allowing things such as a community garden, or bee and butterfly garden to promote the local species. There are native blue banded bees in the area and if the area is to be promoted as "family friendly", it should include spaces for children to explore nature and to have use of recreational facilities.

Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.

Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.

The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.

A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.

My main issues are summarised in the following Dot-Points:

***The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)***

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

***The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone***

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood zoning

***Buffer-Zones around the site Boundary***

Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks

Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

***No Traffic Access to Lochside Drive***

Traffic Chaos - Have 2 roads from Frederick Road into the development

### ***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too. With many families presumably moving into the development, the use of other facilities in the area will be too overcrowded.

### ***Tree Management***

Significant / Regulated / Exempt trees to remain  
A Special Value Tree Assessment must be conducted

### ***Habitat Reserve for Vulnerable Cockatoos***

The Yellow-Tailed Black Cockatoos needs protection  
The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

### ***Heritage Recognition***

Heritage Gardens to be maintained, no road through it and not re-zoned  
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Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

### ***No Financial Contribution in lieu of actual Open Space***

Open Space to include Buffer Zones - Community Sports Field  
Water Feature - the PINERY

Kind regards,

Jacky Semler  
[REDACTED] Lochside Drive  
West Lakes SA 5021

Mob: [REDACTED]



## Submission 144

**Archived:** Tuesday, 22 November 2022 10:49:15 AM

**From:** [noreply@charlessturt.sa.gov.au](mailto:noreply@charlessturt.sa.gov.au)

**Sent:** Mon, 21 Nov 2022 11:38:10

**To:** [Jim Gronthos](#)

**Subject:** West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

**Importance:** Normal

**Sensitivity:** None

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## West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

There has been a submission of the form West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form through your Your Say Charles Sturt website.

### Customer type?

Member of the public

### First Name

Russell

### Last Name

Davey

### Email Address

[REDACTED]

**Postal Address**

■ Colton Street, West Lakes

**Phone Number**

■

**Your Submission on the West Lakes Residential and Mixed Use Draft Code Amendment**

I support the use of this land for residential development purposes, and acknowledge that to build sustainably we need to move beyond a low density approach. In saying that, the development should prioritise the safe AND efficient movement of pedestrians and cyclists, with connected access to local amenities via both shared-use paths and public transport. To achieve the effective use of public space, on-street car parking must be minimised, and traffic must be limited to a speed that makes for a people-centred environment (30kph). These are lessons that have been learnt the hard way with the WEST development, which has a mess of on street parking, too high speed limits, insufficient connections for cyclists, and no access to public transport unless you live on the fringes of the development.

**Do you wish to make a verbal submission at the Public Meeting to be held in February 2023 (date and time to be confirmed) at the Civic Centre, 72 Woodville Road, Woodville?**

Yes

To view all of this form's submissions, visit

[https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms\\_new/data/706](https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms_new/data/706)

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## Submission 145

**Archived:** Tuesday, 22 November 2022 10:56:21 AM

**From:** [noreply@charlessturt.sa.gov.au](mailto:noreply@charlessturt.sa.gov.au)

**Sent:** Monday, 21 November 2022 10:11:25 PM

**To:** [Jim Gronthos](#)

**Subject:** West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

**Importance:** Normal

**Sensitivity:** None

---



## West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

There has been a submission of the form West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form through your Your Say Charles Sturt website.

### Customer type?

Member of the public

### First Name

Jacky

### Last Name

Semler

### Email Address

[REDACTED]

**Postal Address**

■ Lochside Drive

**Phone Number**

■

**Your Submission on the West Lakes Residential and Mixed Use Draft Code Amendment**

I want the zoning of the development site to be Waterfront Neighbourhood Zone which is the same zone as the surrounding neighbourhood.

Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.

There should be no high-rise towers built that will change the character of the neighbourhood.

As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.

The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.

Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.

The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.

There should be no new road access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road. This is imperative. There is absolutely no need for an entrance off Lochside Drive into the new development. The residents living in the middle of Lochside Drive and the streets branching off it will be severely impacted by having to deal with unnecessary traffic impediments. Frederick Road is a main road, there should only be access to the new

development from Frederick Road. There is enough scope on the site to accommodate this proposal.

Further, the development should ensure that there is enough car park spacing for at least two vehicles per household proposed in the development, plus visitor car park spacing. This should occur whether the resident's wishes are heard or not relating to the proposed re-zoning. If there are not enough car park spaces within the development itself for residents and guests, there will be nothing but chaos on Lochside Drive and Frederick Road itself and the flow of traffic will be damaged. Almost every household has more than one vehicle, just because people are buying an apartment, does not mean they do not have two vehicles. It is irresponsible to allow a development of such size to be built without recognising this fact, especially considering the nature of the public transport system in South Australia. There are just not sufficient public transport options for people to use as an alternative to driving. Families will generally have two vehicles. This should be an absolute must for any development.

There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.

There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.

The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kaurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kaurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.

This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.

As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area. It is also a known burial location, and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building up until approximately 1999.

I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.

There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.

Relevant Aboriginal organisations, such as the Kurna Yerta Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.

Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.

All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.

The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.

The development should include a suitable sized water feature and fountains.

A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs. There is an opportunity for the Council to incorporate a green initiative in the development, allowing things such as a community garden, or bee and butterfly garden to promote the local species. There are native blue banded bees in the area and if the area is to be promoted as "family friendly", it should include spaces for children to explore



nature and to have use of recreational facilities.

Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.

Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.

The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.

A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.

My main issues are summarised in the following Dot-Points:

The Area To Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood zoning

Buffer-Zones around the site Boundary

Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks

Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

No Traffic Access to Lochside Drive

Traffic Chaos - Have 2 roads from Frederick Road into the development

Inclusion of a Community Sports Field & Playground

Families have to play somewhere - 1km to the nearest sportsground is too. With

many families presumably moving into the development the use of other facilities

many families presumably moving into the development, the use of other facilities in the area will be too overcrowded.

#### Tree Management

Significant / Regulated / Exempt trees to remain

A Special Value Tree Assessment must be conducted

#### Habitat Reserve for Vulnerable Cockatoos

The Yellow-Tailed Black Cockatoos needs protection

The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

#### Heritage Recognition

Heritage Gardens to be maintained, no road through it and not re-zoned

The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

No Financial Contribution in lieu of actual Open Space

Open Space to include Buffer Zones - Community Sports Field

Water Feature - the PINERY

**Do you wish to make a verbal submission at the Public Meeting to be held in February 2023 (date and time to be confirmed) at the Civic Centre, 72 Woodville Road, Woodville?**

Yes

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[https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms\\_new/data/706](https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms_new/data/706)

## Submission 146

**Archived:** Tuesday, 22 November 2022 11:03:53 AM

**From:** [noreply@charlessturt.sa.gov.au](mailto:noreply@charlessturt.sa.gov.au)

**Sent:** Tue, 22 Nov 2022 00:00:13

**To:** [Jim Gronthos](#)

**Subject:** West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

**Importance:** Normal

**Sensitivity:** None

---



## West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

There has been a submission of the form West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form through your Your Say Charles Sturt website.

### Customer type?

Member of the public

### First Name

Anne

### Last Name

Dohnt

### Email Address

[REDACTED]

**Postal Address**

█ Lakeview Ave West Lakes SA 5021

**Phone Number**

█

**Your Submission on the West Lakes Residential and Mixed Use Draft  
Code Amendment**

Attention Jim Gronthos

Dear Jim,

In regard to the above Community Engagement Process, I wish to submit my comments in relation to this rezoning project.

Whilst I am certainly not opposed to the development of the land, I believe that the proposed zoning is completely contrary to the character and amenity afforded the current West Lakes area and does not take into consideration the existing residents, especially those living adjacent to the land (some have been there for 40 years) and or, to the additional traffic flow that will be generated by the proposed number of new dwellings. I am a long-term resident of 40 years living in Lakeview Avenue who will be affected by any change in the zoning of this land.

We do not want another WEST Development!!!

My areas of concern are:

1. No Traffic Access to Lochside Drive. This road was never built as an access road to allow the number of vehicles being proposed in addition to the traffic that currently uses this road. Along with the additional on-street parking and the severely restricted view at the corner of Frederick Road caused by the previous redevelopment of the old council depot any additional traffic will result in a dangerous outcome for all existing and future residents. Car parking indents should also be considered on Lochside Drive in front of the proposed 12 new homes fronting this road to help reduce the potential for additional traffic congestion. See photo attached which indicates the congestion when dwellings are built on either side of the road.

I would ask the council to seriously consider two access roads onto Frederick Road which is a main arterial road capable of handling the expected additional

traffic flow instead of using Lochside Drive.

Once again, the attached diagram illustrates my suggested alternative for the access road onto Frederick Road and the indent parking on Lochside Drive.

2. Waterfront Neighbourhood Zone. I strongly believe that the area should be rezoned as Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail) which aligns with the existing zoning that applies to all the land immediately adjacent to the area in question. It should NOT be re-zoned as Urban Renewal Neighbourhood Zone as the area does not fit the definition of this zone and does not align with the current neighbourhood. However, I would be prepared to accept a number of higher-level buildings fronting Frederick Road to give the developers some flexibility in increasing the number of dwellings, provided the majority of the development is changed to Waterfront Neighbourhood zoning. I have attached a diagram to illustrate this.

3. Impact of Soil Contamination on Storm Water. I am extremely concerned about the impact of the additional stormwater into the lake. With the large number of extra dwellings being proposed this will result in a considerable amount of extra stormwater running into the lake and if the land has not been correctly remediated then this will have a severe impact on the quality of the lake water and on the health of those using the lake for public recreation. I would request that the council ensure that the public is made fully aware of any risks that may result from this issue. Also, any soil contamination remediation should NOT involve capping and retainer walls as allowed in the old council depot development at the corner of Frederick Road and Lochside Drive. Other options should be used by the developer to comply with EPA standards.

4. Increase of Open Space. I would like to see sufficient open space included, such as a sports park, playgrounds, walking trails and a buffer zone along the boundaries with the existing residents. It is essential that future and existing residents can enjoy an outdoor lifestyle that currently exists in the West Lakes area. I would request that council ensure the open space exceeds the minimum requirement as allowed for development today and that council does not accept any financial contribution to restrict the amount of open space required. I would

also reduce the proposed buffer zone around the existing Pumping Station to 20 meters as 50 meters seems extreme to me. See attached diagram.

5. Preservation of Heritage Buildings, Fauna and Flora. I would like assurances from the council that any proposed development ensures the protection of the heritage buildings and of any significant trees (including the Pinery Forest) that currently exist on the land. Also, I believe it is essential to ensure the preservation of any protected species of fauna or flora and that the council respect any indigenous history that may have existed on the land.

#### 6. Transport

There is currently no public transport passing this new development on Frederick Road. The bus service needs to be restored due to the number of new residents requiring close, convenient access to public transport for schools, work, shopping etc. The distance to the nearest operable bus stops is considerable and not suitable.

I sincerely hope that my and the other residents' concerns are fully considered by the council and that we are given a fair and reasonable outcome that will enable us to continue to enjoy a lifestyle that West lakes is renowned for.

Regards

Anne

Anne Dohnt

█ Lakeview Ave

West Lakes SA 5021

Tel: █

Email: █

**Do you wish to make a verbal submission at the Public Meeting to be held in February 2023 (date and time to be confirmed) at the Civic Centre, 72 Woodville Road, Woodville?**

No

**Upload any documents that support your submission**

- [Anne\\_Dohnt\\_Submission.pdf](#)
- [Lochside\\_Drive\\_Photo1.jpg](#)

To view all of this form's submissions, visit

[https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms\\_new/data/706](https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms_new/data/706)

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## Submission 147

**Archived:** Tuesday, 22 November 2022 12:58:11 PM

**From:** [noreply@charlessturt.sa.gov.au](mailto:noreply@charlessturt.sa.gov.au)

**Sent:** Tuesday, 22 November 2022 12:34:19 PM

**To:** [Jim Gronthos](#)

**Subject:** West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

**Importance:** Normal

**Sensitivity:** None

---



## West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form Form Submission

There has been a submission of the form West Lakes Residential and Mixed Use Draft Code Amendment - Submission Form through your Your Say Charles Sturt website.

### Customer type?

Member of the public

### First Name

con

### Last Name

kikianis

### Email Address

[REDACTED]

**Postal Address**

Keppel grove west lakes

**Phone Number**

[REDACTED]

**Your Submission on the West Lakes Residential and Mixed Use Draft  
Code Amendment**

It will great for our suburb in introducing a development like this

**Do you wish to make a verbal submission at the Public Meeting to be held  
in February 2023 (date and time to be confirmed) at the Civic Centre, 72  
Woodville Road, Woodville?**

No

To view all of this form's submissions, visit

[https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms\\_new/  
data/706](https://www.yoursaycharlessturt.com.au/index.php/dashboard/reports/forms_new/data/706)

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Charles Sturt.

## Submission 148

**Archived:** Tuesday, 22 November 2022 3:15:18 PM

**From:** [Bulldog](#)

**Sent:** Tuesday, 22 November 2022 1:22:16 PM

**To:** [Jim Gronthos](#)

**Cc:** [REDACTED]

**Subject:** West Lakes Residential and Mixed Use Draft Code Amendment

**Importance:** Normal

**Sensitivity:** None

---

Hi Jim Gronthos,

I have been a resident in the West Lakes area since 1975, firstly we built at [REDACTED] Georgia Avenue, West Lakes Grange and then in 1981, [REDACTED] Driver Court, West Lakes on a vacant block purchased from the Developer, Delfin Realty.

Driver Court is connected to Lochside Drive which we use to connect to Frederick Road, mainly at the Northern, SA Water Treatment site. We have raised 3 children, one of whom lives on Lochside Drive with his wife and 2 school aged children.

Our decision to build and live in West Lakes with its Encumbrances, quality of environment and raise our Family and Grandchildren is the best we have made in our lifetime.

Please don't destroy it for initially extra money but increased problems and extra cost.

I do not support the **West Lakes Residential and Mixed Use Draft Code Amendment** that the Charles Sturt Council posted to my address.

I do not support access to Lochside Drive for the very high number of vehicles that would result from approval of this Concept Plan X, West Lakes.

We are already experiencing large increases in residents, vehicles, visitors, kerbside parking as existing house blocks are being divided in to 2 and replaced with 2 storey homes.

I do not support 4 or higher storey apartment blocks/buildings in this concept. The storm water given off by these buildings would be very high and put the whole system under enormous pressure resulting in flooding in the adjacent area.

I do not support this area as being suitable for a high density Bowden type development.

Re Lot 10I, I feel SA Water who is responsible for the soil contamination should maintain the surface as soft landscaping with suitable native vegetation for native bird life and small creatures etc.

Maybe SA Water etc could sell Lot 100 to a Developer for a reduced price to cover a proper remediation of the current pollution and give the Developer a fair nett profit for fewer residences more suitable to the area.

I think the Date Palms should remain along Frederick Road in keeping with the Old Port Road and Commercial Road.

I have copied the unanimous approval submission from the meeting held in St. Bedes, Semaphore which my husband attended.

I support the points made in varying priorities. I do not support any Re-Zoning that would end up with the Concept Plan X etc.

*"I want the zoning of the development site to be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.*

*Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.*

*There should be no high-rise towers built that will change the character of the neighbourhood.*

*As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.*

*The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.*

*Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.*

*The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.*

*There should be no new road access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road.*

*There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.*

*There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.*

*The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kaurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kaurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.*

*This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.*

*As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area. It is also a known burial location, and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building up until approximately 1999.*

*I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.*

*There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.*

*Relevant Aboriginal organisations, such as the Kaurna Yerti Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.*

*Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.*

*All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.*

*The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.*

*A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.*

*Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.*

*Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.*

*The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.*

*A Soil Remediation option should not involve 'Capping' and the use of retainer walls (with voids in-between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.*

*My main issues are summarised in the following Dot-Points:*

***The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)***

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

***The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone***

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood *zoning*

***Buffer-Zones around the site Boundary***

Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks

Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

***No Traffic Access to Lochside Drive***

Traffic Chaos - Have 2 roads from Frederick Road into the development

***Inclusion of a Community Sports Field & Playground***

Families have to play somewhere - 1km to the nearest sportsground is too far

***Tree Management***

Significant / Regulated / Exempt trees to remain

A Special Value Tree Assessment must be conducted

***Habitat Reserve for Vulnerable Cockatoos***

The Yellow-Tailed Black Cockatoos needs protection

The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

***Heritage Recognition***

Heritage Gardens to be maintained, no road through it and not re-zoned

The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

***Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted***

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options



are available

***No Financial Contribution in lieu of actual Open Space***

Open Space to include Buffer Zones - Community Sports Field

Yours sincerely

Jennifer Townsend

■ Driver Court, West Lakes SA

Ph ■

## Submission 149

Archived: Tuesday, 22 November 2022 3:27:30 PM

From: [REDACTED]

Sent: Tuesday, 22 November 2022 1:31:39 PM

To: [Jim Gronthos](#)

Cc: [REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** West Lakes Residential Mixed Use Draft Code Amendment

**Importance:** Normal

**Sensitivity:** None

---

Bruce Henshall  
[REDACTED] Lakeview Ave,  
West Lakes SA 5021  
[REDACTED]

Dear Mr Gronthos,

I feel very strongly that the zoning of the development site should be **Waterfront Neighbourhood Zone** which is the same zone as the surrounding neighbourhood.

Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.

There should be no high-rise towers built that will change the character of the neighbourhood.

As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.

The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.

Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.

The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.

There should be no new road access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road. The intersection of Lochside Drv and Fredricks Rd is already difficult enough. The high density development on the south western corner of that intersection has already resulted in half the road being clogged with residents cars parked overnight. If that is your vision for this area then you are doing your current residents and rate payers a great disservice.

There should be habitat protection of the Vulnerable listed (SA National Parks & Wildlife Act, 1972

Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.

There should be a 20 metre buffer-zone around the development as there has been for the last 4 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.

The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kaurua Public Space Recognition and Indis on Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kaurua Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.

This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.

As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area. It is also a known burial location and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building until approximately 1999.

I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.

There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. The documents can be obtained from Community Advocate - Stephen Hammond.

Relevant Aboriginal organisations, such as the Kaurua Yerta Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.

Because of the Aboriginal significance of the area it should be recognised in an appropriate manner within the development site.

All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should remain in the boundary Buffer-zones.

The large section of River trees (The RIVER) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.

The development should include a suitable sized water feature and fountains.

A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.

Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.

Open Space should include the buffer-zones, the community sports field, PINERY, water feature and at least 1 other appropriately sized reserve area in the site.

The Heritage listed gardens and two buildings should remain and not be built over (including the placement of a road). This area should not be re-zoned so part of it can be otherwise used.

A Soil Remediation option should not involve 'Capping' and the use of retaining walls (with voids in between) to raise ground heights should also not be allowed. There are many other options available that would still comply with EPA standards.

My main issues are summarised in the following Dot-Points:

**The Area TO Be Re-zoned As A Waterfront Neighbourhood Zone (& Mixed-Use sub-zone - Retail)**

1-2 Storey buildings which takes advantage of waterfront locations which is the same zone as the surrounding neighbourhood

**The Area NOT To Be Re-zoned As Urban Renewal Neighbourhood Zone**

The area does not fit the guidelines for approval of this zone.

No Technical & Numerical Variations different to existing neighbourhood zoning

**Buffer-Zones around the site Boundary**

Cultural/Historic Trail Link to Pt. Adelaide - Cycling/Walking tracks

Habitat for Cockatoos - Noise Buffer for Residents - (Stormwater Swales if necessary)

**No Traffic Access to Lochside Drive**

Traffic Chaos - Have 2 roads from Frederick Road into the development

**Inclusion of a Community Sports Field & Playground**

Families have to play somewhere - 1km to the nearest sportsground is too far

**Tree Management**

Significant / Regulated / Exempt trees to remain

A Special Value Tree Assessment must be conducted

**Habitat Reserve for Vulnerable Cockatoos**

The Yellow-Tailed Black Cockatoos needs protection

The PINERY needs to be protected - Achieves Urban Tree Canopy Plan

**Heritage Recognition**

Heritage Gardens to be maintained, no road through it and not re-zoned

The history of Aboriginals living in the area (PINERY / Port River area) must be recognized within the new development

**Retainer Wall development that raises Ground Heights (as part of any soil remediation 'Capping' option) should not be permitted**

Retainer Walls with 'Voids' are DEATH TRAPS for small children – other soil remediation options are available

**No Financial Contribution in lieu of actual Open Space**

Open Space to include Buffer Zones - Community Sports Field

Water Feature - the PINERY

As a resident and rate payer of 7 years I implore you to give consideration to the points above.  
Use Waterfront Neighborhood Zoning requirements for this proposed development.

Regards,

Bruce Henshall

## Submission 150

**Archived:** Tuesday, 22 November 2022 3:35:40 PM

**From:** [Richard Billis](#)

**Sent:** Tuesday, 22 November 2022 1:58:22 PM

**To:** [Jim Gronthos](#)

**Cc:** [REDACTED]

**Subject:** West Lakes Residential Mixed Use Draft Code Amendment

**Importance:** Normal

**Sensitivity:** None

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*Hello,*

*My name is Richard Billis. I live at [REDACTED] Lakeview Avenue, West Lakes 5021. Our home is opposite the easement park between the homes and the SA Water Treatment Plant. My wife and I have lived here for 4 years.*

*"I want the zoning of the development site to be Waterfront Neighbourhood Zone which is the same zone as the surrounding neighbourhood.*

*Technical and Numerical Variations relating to heights of buildings, etc, should be the same as the existing neighbourhood.*

*There should be no high-rise towers built that will change the character of the neighbourhood.*

*As there is no public transport passing the site the number of residents being proposed to inhabit this area is unworkable.*

*The site is NOT in a Major Growth Transport Corridor and therefore medium density housing up to 5-storeys should NOT apply.*

*Council's own research in 'The Council Assessment of housing yields in their April 2014 Strategic Directions Report' identified significantly less people and housing than depicted in the current proposal. That assessment clearly identified that a future development would 'fit' in with the existing neighbourhood and would not alter the character, number or heights of the surrounding buildings.*

*The Council should ensure that all data tests, assessments and capacity reports for the proposed utilities are obtained and reviewed independently before any zoning approval is provided.*

*There should be no new road access into Lochside Drive (or any other surrounding street) as it will cause traffic chaos. There should be two roads from the development onto Frederick Road.*



*There should be habitat protection for the Vulnerable Listed (SA National Parks & Wildlife Act, 1972 -Schedule 8) Yellow-tailed Black Cockatoos that live in the development site. These birds migrate annually and are already threatened due to habitat destruction. Removing all the trees from the site could have a devastating effect on their survival.*

*There should be a 20 metre buffer-zone around the development as there has been for the last 40 years. The buffer-zone can be used as noise buffering, habitat protection for the Cockatoos, a walking/cycling trail around the development, a cultural/historic walking trail incorporating Aboriginal Cultural markers and if needed storm-water swales.*

*The Council should implement the recommendation included in the 2011 sponsored research (included in the document – The City Of Charles Sturt: Kurna Public Space Recognition and Inclusion, Page 51) that states there is an opportunity to continue the interpretation (of the Port Adelaide Kurna Trail) into the Charles Sturt area. This would involve linking the Cultural / Walking / Cycling trail in the development, along the edge of West Lakes, past Point Misery and linking to the new Port Adelaide Cultural Centre being built.*

*This Trail could be informative and be similar to other Trails that exist in Port Adelaide and along the Torrens River in Adelaide.*

*As the development site is in an area that was once surrounded by a large Pine Forest and bounded by the Port River, it has special significance to Aboriginal People who lived, fished and hunted in the area. It is also a known burial location, and whilst no registered Aboriginal site is recorded in the development area, I have been informed that Aboriginal bones, skulls and a hand-drawn map of where these were found in the site, were on public display in the former Administration Building up until approximately 1999.*

*I have also been informed that the bones have since gone 'missing' and there are current efforts by SA Water to try and locate them.*

*There are two community residents who have come forward and stated they saw the bones on display and have made Statutory Declarations signed under the Oaths Act testifying to this fact. These documents can be obtained from Community Advocate - Stephen Hammond.*

*Relevant Aboriginal organisations, such as the Kurna Yerti Aboriginal Corporation (KYAC), should be informed of this information by Council so that appropriate measures can be taken to repatriate the remains.*

*Because of the Aboriginal significance of the area, it should be recognised in an appropriate manner within the development site.*

*All Significant/Regulated/Exempt trees should not be removed and the development should be designed around them. A Special Value Tree assessment should be conducted that identifies the Remnant Vegetation in the site as well as those trees that are inhabited by the Vulnerable Cockatoos. These Special Value trees should then be protected and should*

*remain in the boundary Buffer-zones.*

*The large section of Pine trees (The PINERY) should be protected and not removed. The retention of these trees supports the Council's Tree Canopy Plan.*

*The development should include a suitable sized water feature and fountains.*

*A community sports field & playground should be included in the site as there is a distinct lack of these amenities in the Western Suburbs.*

*Council should not allow any Financial Contribution to be paid for the loss of any Open Space Area within the development.*

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*My main issues are summarised in the following Dot-Points:*

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