

West Lakes Residential and Mixed Use Draft Code Amendment

Written Submissions Received

Wednesday 28 September - Thursday 24 November 2022

List of Written Submissions Received

No.	Names
1.	Adrian Tero Epic Energy
2.	Daniel Cooper Apa
3.	Scott Rankine
4.	Schanett Size
5.	Brenton Maidment
6.	Dieter Kletschkus
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

No.	Names
52.	Jordan Zampogna
53.	Siena Withey
54.	Claudia Withey
55.	Mandy Miller
56.	Dieter Kletschkus
57.	Joseph Debono
58.	Steve Hooper City of Port Adelaide Enfield
59.	Anna Debono
60.	Tom McCready Acting Chief Executive Officer City of Adelaide
61.	Mathew Maidment
62.	Ian Wright
63.	Luise Humby
64.	John Stallard
65.	Carmine Cafasso
66.	Toula Valenta
67.	Frank Valenta
68.	Andrew Valenta
69.	Lucas Valenta
70.	Gail Stallard
71.	John Kurda
72.	Morgan Humby
73.	Kerri Huckel
74.	Glyn Wingard
75.	Heather Wingard
76.	Peter Searle
77.	John L Cooper
78.	Jesper Munch
79.	Carmen Carter
80.	Julie McIntyre Grand Kitchens
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
89.	John Cooper J.P.
90.	Joanna Wells Outreach Coordinator Conservation Council SA
91.	Gail Turnbull
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
100.	Rob Welsh
101.	Edward Arkit

No.	Names
102.	Elizabeth Arkit
103.	Paul Sperling
104.	Judy Sperling
105.	Paul Sperling (also lodged submission 103)
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
116.	Sue South
117.	Scott Daniells
118.	Susan Rohmert
119.	Kai Rohmert
120.	Ron Baker
121.	Rosemary Baker
122.	Gary Dohnt
123.	Terry Rawson
124.	Sarka Laznicka
125.	John L Scotcher
126.	Sue McKay
127.	Dave McKay
128.	Kevin and Lorraine Bourke
129.	Stephen Hammond on behalf of: SA Water Code Amendment Community Resident's Group (SWCACRG)
130.	Bob Nicol
131.	Teresa Nicol
132.	Stephen Townsend
133.	Belinda Dzido
134.	Chris
135.	Bruce Townsend
136.	Gianna Finis
137.	Ryan Stewart Broadway Property Advisory
138.	Mrs Dionne Robertson
139.	Ann-marie Bryant
140.	Andrew Zammit
141.	Jamie Guerra Leedwell
142.	Isabella Okulewicz
143.	Jacky Semler
144.	Russell Davey
145.	Jacky Semler
146.	Anne Dohnt
147.	Con Kikianis
148.	Jennifer Townsend
149.	Bruce Henshall
150.	Richard Billis
151.	Riley Price
152.	Darrell Martin
153.	Sue Martin

No.	Names
154.	Jeanette Ramsey
155.	Ian Wright
156.	Trevor and Carolyn Harding
157.	Julien Maddem
158.	Lisa Chan
159.	John Kong
160.	Kevin Kong
161.	Ken Kong
162.	Steven Langley President Birds SA
163.	Sandra Grant
164.	David Grant
165.	Peter Dinan Freedom Fitness
166.	Luke Fearne
167.	Michelle Fearne
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 181

Mr Paul Sutton
Chief Executive Officer
City of Charles Sturt Council
PO Box 1
WOODVILLE SA 5011

council@charlessturt.sa.gov.au
igronthos@charlessturt.sa.gov.au

Dear Mr Sutton

I write on behalf of residents of West Lakes about the proposed West Lakes Residential and Mixed Use Draft Code Amendment.

Many constituents have contacted my office or spoken to me to raise issues about the proposed Code Amendment.

A few residents are opposed to any development of the site. Generally, residents taking this position argue that development would negate the current advantages of living in the area near a land reserve and lake and in a quiet suburb.

However, those views are in the minority. Overall, the majority of residents I have spoken to are not opposed to some level of housing development occurring on the site, but there are several elements of the proposed development which are causing significant concern.

I summarise these concerns below.

There is strong opposition to an entrance from Lochside Drive

Residents argue that the intersection of Lochside Drive and Frederick Road is already congested making it difficult to get in or out of Lochside Drive, and a further road would exacerbate what is already a serious traffic problem. Overall, the idea of creating an entry from Lochside Drive is viewed as highly problematic.

It is understood the developer desires an entrance to enable housing to be developed fronting on to Lochside Drive. Additional housing fronting Lochside Drive will exacerbate on-street parking problems along Lochside Drive and other streets.



Complaints about traffic snarls, road designs that no longer provide comfortable access from one road to another, and a loss of on-street parking are raised in my office on a regular basis. These complaints are not limited to the area under consideration for development but span many areas of West Lakes. An access road from Lochside Drive that intensifies these existing traffic pressures will prove to be extremely unpopular among residents.

Type of housing and building heights

Generally, residents oppose the construction of residences higher than two storeys and fear overcrowding in medium density dwellings. Higher towers are opposed for the same reason. In this context many are concerned that the development would alter the character of the suburb.

There is a concern that narrow housing blocks and insufficient off-street parking per dwelling will exacerbate on-street parking problems.

It has been highlighted to me that the Council assessment of housing yields in the 2014 Strategic Directions Report (Report) has been cited as evidence against the current proposal. The report is cited to argue that a lower population growth was predicted in 2014. Figures from this report have been reported to me as increasing from a predicted 96 dwellings in 2014 to 560 in the current proposal and a predicted population of 210 in 2014 rising to 1,300 in the current proposal.

Residents have also noted that the Report included statements that future development would fit in with existing neighbourhoods and not alter the character or heights of surrounding buildings.

Reduction of green space

Another issue attracting considerable comment is the encroachment into green space. In this context residents have called for a green boundary around existing properties as well as a green boundary around the entire site.

Existing residents along Lakeview Avenue highlight what they believe were undertakings for a buffer to be maintained between existing dwellings and any new dwellings. This is not provided for in the current proposal.

As part of the advocacy for green space some suggest that all significant trees remain, and the development built around them. A special value tree assessment has been called for identifying remnant vegetation and trees inhabited by vulnerable cockatoos.

In addition, the protection of the Pinery is also called for in line with Council's Tree Canopy Plan.

Devaluation of property and overcrowding

Residents fear that a development of the type proposed with many more dwellings on smaller allotments will devalue their properties. Their belief is that high rise apartment blocks and medium density dwellings, with poor amenity, reduced open space and insufficient parking will lead to overcrowding and negatively affect the value of the area.

Lack of public transport

Residents argue that a lack of public transport services to the proposed site and the anticipated population increase could lead to more traffic problems. As Council are aware, I receive a considerable number of complaints about a range of traffic and parking problems in West Lakes.

Residents have pointed out that the development land is outside a major public transport corridor.

Soil remediation and retaining walls

Residents are concerned that soil remediation is proposed to be achieved by "capping", which is the cheapest and most expedient option, rather than the most appropriate option. Alternative options which are more fulsome and appropriate in their approach to a genuine long-term sustainable remediation of the site should be explored.

Residents argue that the EPA audit assessed soil contamination risk based on low density dwellings while the developer proposes medium density dwellings. The EPA Site Contamination Audit Statement states 'No active remediation is considered to be required for the Site based on low density residential and other mixed land use'. The EPA Audit also states that soil contamination exists for low density residential land and includes reference to managing this in the pre-construction stage with shallow clean fill with no reference to alternatives.

Further, residents argue that the method of capping up to two metres of soil over the site requires the erection of retainer walls requiring large enough voids between fencing to pose a safety and amenity risk. Other issues raised about the voids include the potential for rubbish to accumulate in the voids and weeds to grow out of control, and the potential for intrusion into existing resident properties.

Zone for waterfront neighbourhood

One option put forward to ameliorate some issues was to designate the zone as a waterfront neighbourhood zone the same as the surrounding neighbourhood. The rationale for this concern is not opposition to development, but an expectation that the development be in keeping with the existing neighbourhood.

On 24 October a deputation of residents to Council argued that the area's zone designation be Waterfront Neighbourhood.

Aboriginal Significance of the Area

One resident has highlighted they believe the area has been an aboriginal burial site, and that this should be investigated. In any event, it has been proposed that first nations people should be recognised appropriately in any development of the site. One option put forward was continuation of the Port Adelaide Kaurna Trail.

As you would be aware, residents have also commented extensively on other ways to improve the proposal. Some suggestions include:

- water features and fountains
- community sports field and playground together with an additional appropriately sized reserve
- retention of heritage listed sites
- buffer zone with a walking and cycling path, cultural/historic trail to Port Adelaide Cultural Centre, habitat protection for cockatoos, storm-water swales
- solar farm
- two entrances on Frederick Road.
- green buffer around existing 'Pinery' trees
- recognition of the aboriginal significance of the area.

As you would be aware, a residents' group called a public meeting on 13 October, which I attended. The meeting was very well attended and lively.

Residents have an expectation that Council will respond to their concerns by amending the plan and then seeking further consultation.

I understand Council will arrange a public meeting early in 2023 and I would be pleased to receive early advice on this.

Yours sincerely



Stephen Mullighan MP
MEMBER FOR LEE

24 November 2022

Submission 182

Archived: Thursday, 24 November 2022 1:41:04 PM

From: noreply@charlessturt.sa.gov.au

Sent: Thursday, 24 November 2022 12:43:16 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

Paul

Last Name

Sykes

Email Address

[REDACTED]

Postal Address

█ Lakeview Avenue, West Lakes SA 5021

Phone Number

█

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

I have some concerns about the proposed West Lakes Residential and Mixed Use Draft Code Amendment.

My concerns include:

- The bulk and scale of the proposed 4 & 5 storey buildings, which will be out of character with the existing locality.
- The increase in traffic on Lochside drive. Particularly in regard to the queuing of cars seeking to turn onto Frederick Road. Is it possible to create an additional turning lane at this intersection.
- What will be developed in the Infrastructure Zone? Could part of this area be dedicated to an additional turning lane onto Frederick Road?
- The impact on the amenity of the households that are opposite the proposed new street entrance on Lochside Drive.

Some opportunities are:

- Additional public transport option on Frederick Road to get residents to the city, Port Adelaide and West Lakes Shopping Centre etc.
- A footpath that would enable cyclists (particularly children) to ride to the Bower Road BMX track via Frederick Road, without having to ride on the road as is currently the case.
- An improved pathway around the lake to the north of the development to accommodate the increase in usage. Ideally wide enough to allow bikes.
- Some more benches to accommodate the increase in lakeside walkers and people fishing.

I would like to make a verbal submission at the Public Meeting please.

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

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

Submission 183

Archived: Thursday, 24 November 2022 4:03:25 PM

From: [Lewis Barnes](#)

Sent: Thursday, 24 November 2022 4:01:03 PM


To: [Jim Gronthos](#)

Subject: West Lakes Draft Code amendment

Importance: Normal

Sensitivity: None

Attachments:

[SUBMISSION_Lot100_Part 101.docx](#) 

Please find attached submission re West Lakes Residential and Mixed Use Draft Code Amendment (privately funded).

We have no wish to be heard at the Public Meeting to be held in early 2023.

We trust that Council considers this submission which we believe reflects the view of an overwhelming majority of the residents of this area, but believe that council will vote in maximising development so as to maximise rate return. If the proposed development is approved another concrete jungle (future slum) will result and nearby resident's property values will be severely degraded.

Yours sincerely

L.C. and J.A.Barnes

 Bega Court. West Lakes 5021

Ph: 

Email: 

SUBMISSION

re

WEST LAKES RESIDENTIAL AND MIXED USE DRAFT CODE AMENDMENT (PRIVATELY FUNDED)

The proposal to rezone and redevelop Lot 100 and part 101 (West Lakes) is in general supported as the area is currently an overgrown fire hazard and haven for vermin, particularly snakes, foxes, cats and pigeons. (Council must pressure SA Water and the development proponent to undertake mowing and clearing of undergrowth **BEFORE** the upcoming fire season).

However, a number of aspects of the proposed Concept Plan are strongly opposed, by us, and the local community.

1. In keeping with the adjacent properties there should be no development over 2 stories high. Development similar to the West development at West Lakes with its concrete jungle hi-rise, lack of green space and narrow, car lined alleys is to be avoided at all costs.
2. There should be no industrial development in this zone, industrial development should be restricted to the area east of Frederick Road. The rezoned area should be zoned residential (and appropriate infrastructure) only.
3. The area proposed for public open space (or green space) is woefully inadequate and should be at least doubled if not trebled. There are a number of tall trees on the property and these should be retained at all costs, although palm trees must be removed as these host rats and pigeons. Any other tree over 5m high that has to be removed should be replaced by two or three native trees. It is recommended that the public green space include a large, grassed and treed dog park with shade and seating to cater for the large number of dogs and dog walkers currently using Lochside Drive, Lakeview Avenue and very busy Frederick Road.
4. The proposed indicative vehicle access from Lochside Drive is **strongly opposed**. Lochside Drive is the main access road for residents west and immediately north of the golf course and is becoming increasingly busy as subdivision and redevelopment of many properties proceeds. Development has also significantly increased the number of cars parked on this road, particularly near the corner with Frederick Road, at times resulting in a traffic bottleneck at this corner. Increased traffic on Lochside Drive resulting from the proposed redevelopment will only compound the current problems. **ALL ACCESS INTO THE PROPOSED REDEVELOPMENT MUST BE FROM FREDERICK ROAD** and access roads must be

wide enough to allow safe passage, even with the numerous cars that will inevitably be parked on the street.

The inclusion of two Local Heritage Places within the area to be rezoned and redeveloped is noted, presumably the two substantial red brick buildings facing Frederick Road. These attractive buildings should be restored, at the developers cost, and made available to the community, perhaps as a community centre and/or restaurant/café/coffee shop as part of the public open space. These buildings should be surrounded by treed green space and not be obscured by buildings along Frederick Road

We believe that the above views are held by a majority of the residents near the area proposed for rezoning and redevelopment and it is Council's responsibility to ensure that any redevelopment is in keeping with the resident's wishes, is sympathetic with the adjacent development and doesn't result in decreased property values in the area.

In lodging this submission we advise that we have no wish to be heard at the public meeting scheduled for early 2023.

Submission lodged by:

L.C. and J.A. Barnes

█ Bega Court

West Lakes. 5021

Ph: █

Email: █

Submission 184



Environment Protection Authority
GPO Box 2607 Adelaide SA 5001
211 Victoria Square Adelaide SA 5000
T (08) 8204 2000 F (08) 8204 2020
Country areas 1800 623 445

EPA 701-405

Mr Jim Gronthos
Senior Policy Planner, Urban Projects
City Of Charles Sturt
72 Woodville Road
WOODVILLE SA 5011

Dear Mr Gronthos

West Lakes Residential and Mixed Use Draft Code Amendment

Thank you for providing the Environment Protection Authority (EPA) with the opportunity to comment on the West Lakes Residential and Mixed Use Draft Code Amendment (CA).

The EPA notes the CA is privately funded by Potentia West Lakes Pty Ltd who have entered into a contract with SA Water (the current owners of the land) to purchase and redevelop the subject site.

It is proposed that Lot 100 Frederick Road, West Lakes be rezoned from an Infrastructure Zone to an Urban Renewal Neighbourhood Zone, and Lot 101 remain within the Infrastructure Zone.

The purpose of the CA is to facilitate low to medium density residential, mixed use and commercial development in the vicinity of Mariners Reserve, the lake frontage, associated recreation areas and other existing services. An SA Water owned and operated re-lift wastewater pumping station is proposed to remain in operation on the south-eastern corner of the site (i.e. Lot 101).

The EPA has reviewed the CA to ensure that all environmental issues within the scope of the objects of the *Environment Protection Act 1993* and the State Planning Policies (pursuant to the *Planning, Development, and Infrastructure Act 2016*) are identified and considered. The EPA is primarily interested in ensuring that the proposed rezoning is appropriate and that any potential environmental and human health impacts that would result from future development are able to be appropriately addressed (guided by Planning & Design Code policy) at development application stage.

The EPA provides the following comments for your consideration.

Site Contamination

The subject site was formerly used by SA Water for the purpose of operating the 'Port Adelaide Wastewater Treatment Plant' until 2004 when it was decommissioned. While much of the infrastructure remains, the sediment ponds have been backfilled and the majority of the site is now covered in trees and low-lying shrubs and grasses.

The following information was provided with the code amendment:

- *Site Contamination Audit Statement Former Port Adelaide Wastewater Treatment Plant, Frederick Road* prepared by Mr Phillip Hitchcock and dated 19 May 2022 ('the SCAS').

The SCAS includes multiple reports as appendices. The SCAS contains a summary of the findings of the Site Contamination Audit Report ('SCAR') titled *Former Port Adelaide Wastewater Treatment Plant, West Lakes, South Australia*, prepared by auditor Phillip Hitchcock and dated 19 May 2022.

The EPA has reviewed and considered the SCAR, taking into account the relevant guidance provided in the *National Environment Protection (Assessment of site contamination) Measure 1999* ('ASC NEPM') and relevant EPA guidelines, in particular, *Guidelines for the assessment and remediation of site contamination* (2019) ('the GAR'). The SCAR has been accepted by the EPA as having been undertaken in accordance with the ASC NEPM and the GAR. The SCAR has been recorded in the [EPA Public Register](#) (EPA reference 62593) and on the title of land (pursuant to section 103P of the *Environment Protection Act 1993*).

When reviewing the CA, the EPA has also considered other information held by the EPA that is considered to be directly relevant to the CA and subject land.

The SCAS/SCAR takes into account the land uses contemplated by the Code Amendment and the spatial layout of future development as indicated by the proposed Concept Plan. The SCAR provides sufficient information to identify potential sources of contamination and pathways by which receivers (i.e. future users of the site) may be exposed to site contamination. In particular it is noted that:

- potentially contaminating activities ('PCAs') have been undertaken over an extended timeframe and are of a significant scale, magnitude and complexity
- soil sampling has been undertaken across the site, identifying the presence of PFAS compounds
- site contamination of groundwater also exists at the site due to elevated concentrations of PFAS compounds, dioxins and furans, arsenic, cadmium, copper, nickel, zinc, un-ionised ammonia, total nitrogen and phosphorous, and
- assessment of the marine environment detected some elevated chemicals, however the concentrations were comparable to background concentrations, the site adjacent and downstream locations. Therefore, there is no evidence of groundwater contamination originating from the site significantly impacting the quality of the marine environment. Potential groundwater impacts on the marine environment are minimised due to the

dilution and periodic flushing of West Lakes.

The SCAS/SCAR states that remediation is required to mitigate exposure risk and make it suitable for the range of land uses proposed by the CA, and including residential uses with gardens and accessible soils. The SCAS/SCAR requires the placement of a minimum 500 mm depth of waste fill over any contaminated soils where they are accessible to future residents. The auditor will prepare a Capping Validation Plan for any stage of the development where garden-accessible soil is proposed (after the fill has been placed and prior to subdivision) and provide a copy of the EPA.

In addition the SCAS/SCAR requires that:

- the pattern of future development must be in accordance with the Concept Plan. Any substantive changes to the pattern of future development must be endorsed by a Site Contamination Auditor
- the site-wide Construction Environmental Management Plan ('CEMP') attached to the SCAR must be followed
- any deep footings that will intersect with groundwater must be designed with consideration of the potential corrosive impacts of elevated chloride and sulphate levels in the groundwater
- groundwater should not be used for any purpose, unless it has been tested and shown to be safe and suitable for the proposed use/s.

The SCAS/SCAR indicates that the site can be made suitable for the land uses envisaged by the proposed rezoning, upon completion of remediation works and subject to the above conditions.

The EPA is satisfied it has been demonstrated that while site contamination is determined to exist, the completion of required remediation and adherence with SCAS/SCAR conditions will satisfactorily address the realistic human exposure pathways which have been identified and make the site suitable for the range of sensitive and non-sensitive land uses proposed by the CA.

It is noted that the Site Contamination Development Assessment Scheme (as established by the Planning, Development and Infrastructure Act and Regulations, Practice Direction 14 etc) will not be triggered by a development application proposing land division for a sensitive use (or a change of land use to a more sensitive use), if lodged within five years of the date of the SCAR.

Stormwater management and Water Sensitive Urban Design

Any intensification of urban development should include stormwater drainage systems that are designed to maximise the interception, retention and removal of waterborne physical, chemical and biological pollutants prior to their discharge to stormwater systems or receiving waters and including culverts and creeks.

Water Sensitive Urban Design ('WSUD') is a well-recognised approach to managing water in urban environments in a way that minimises impacts on the natural water cycle in an integrated, holistic manner. Through careful design, construction and maintenance, WSUD can support multiple objectives such as water quality and conservation, flood management, enhanced amenity, as well as the protection of biodiversity and ecosystem integrity.

WSUD measures, which may be applied to the proposed area include:

- erosion and sediment control during construction
- detention and use of roof water for hot water, laundry, toilets and irrigation
- detention (treatment) and use of stormwater for irrigation (e.g. on-site detention tanks, ponds, wetlands, aquifer storage and recovery)
- detention, treatment and reuse of grey water for irrigation (e.g. greywater systems, reed beds)
- retention of stormwater through infiltration (e.g. porous paving, soakage pits/trenches)
- specially designed landscaping to treat and utilise stormwater (e.g. swales, rain gardens), and
- protection of existing vegetation to minimise site disturbance and conserve habitat.

The CA proposes to apply the Stormwater Management Overlay to the entire affected area. The intent of the Stormwater Management Overlay is to achieve development that incorporates WSUD techniques to capture and re-use stormwater, as well as managing runoff flows and volume and stormwater quality.

The EPA supports the application of this Overlay.

It is noted that any treated stormwater being discharged to the nearby lakes system must achieve the “recreation and aesthetics” environmental values as described by the *Environment Protection (Water Quality) Policy 2015*.

Further any stormwater or WSUD solution should be prepared taking into account the SCAR and accompanying CEMP to ensure that pollutants are not mobilised during and post construction.

Interface between land uses

SA Water re-lift pumping station

As advised by the EPA to the City of Charles Sturt on 30 June 2022:

- the application of Overlay policy is not necessary to address noise attenuation for the site due to low noise levels from both traffic and the Port Adelaide Re-lift Pump Station (‘PARPS’)
- the EPA concurs with conclusions of the *Environmental Noise Assessment* report prepared by Resonate Consultants and dated 14 June 2022 (reference: A220135RP1 Revision B) that noise sources associated with future mixed use and/or residential development, and/or expansion of activities at the PARPS, are expected to comply with the relevant environmental noise criteria and as such can be appropriately addressed by the Interface Between Land Uses provisions of the *Planning and Design Code* and the *Environment Protection (Noise) Policy 2007*, and
- in response to odour complaints, in 2018 a comprehensive gas phase odour removal solution was implemented at the PARPS. The odour removal system is considered to be best-practice infrastructure and has proven to be highly effective at minimising odours from the plant. Further, the PARPS is subject to ongoing regulation by the EPA (via EPA licence #51175). Conditions of licence include the implementation of a site-specific Odour Management Plan.

Notwithstanding, the Planning and Design Code contains appropriate Interface Between Land Uses general development policies to prompt appropriate assessment of future development in the vicinity of the PARPS.

Other EPA licensed premises

Five EPA licensed premises operate within 300 metres of the subject site, comprising:

- West Lakes Golf Course, Lochside Drive – discharge of stormwater to underground aquifers (licence no. 44982)
- Conroys Smallgoods, 1250 Old Port Road, Royal Park – curing or drying of food products (licence no. 51534)
- Clean Seas Seafood, 7 Frederick Road, Royal Park – fish processing works (licence no. 50228)
- Dover Fisheries, 23 Wilson Street, Royal Park - fish processing works (licence no. 50385), and
- Set to Impress, 3 Brandwood Street, Royal Park - Activity producing listed waste (printing works) (licence no. 51474).

EPA licensed premises can be viewed on the [Location SA Map Viewer](#) and includes links to the relevant EPA authorisation.

The EPA's [Evaluation distances for effective air quality and noise management](#) guideline indicates the distance (relative to specified activities) at which proposals for sensitive receivers should be subject to an assessment of noise and air quality to ensure that residential development is appropriately sited and designed to minimise potential adverse air and noise impacts arising from the lawful operation of approved businesses.

The Planning and Design Code contains appropriate Interface Between Land Uses general development policies to prompt appropriate assessment of future development in the vicinity of the EPA-licensed premises.

Potential need for dewatering

The following information is provided for the benefit of Council during the assessment of future development applications onsite.

The Concept Plan included in the CA indicates residential and/or mixed use buildings up to five storeys in height. The water table onsite commences approximately 3 metres below existing ground level.

Should any proposed buildings include undercroft or basement carparking, the need to undertake dewatering (either during construction and/or on an ongoing basis) should be considered during the assessment of any development application.

The EPA's [Environmental management of dewatering during construction activities](#) guideline (2021) provides advice about the environmental management of dewatering during construction activities under the *Environment Protection Act 1993* and the *Environment Protection (Water Quality) Policy 2015*.

The guideline provides a definition of dewatering and outlines the key considerations in preparing for and managing dewatering and earthworks drainage activities. The guideline should be read in conjunction with the EPA's [Construction environmental management plans](#) guideline which describes how activities undertaken during the construction phase of development will be managed to avoid or mitigate negative environmental impacts and how those environmental management requirements will be implemented.

Further any dewatering solution should be prepared taking into account the SCAR and accompanying CEMP to ensure that pollutants are not mobilised during or post construction.

For further information on this matter, please contact Melissa Chrystal on 8204 1318 or Melissa.Chrystal@epa.sa.gov.au.

Yours sincerely

Scott Douglas

PRINCIPAL ADVISER PLANNING POLICY AND PROJECTS

PLANNING AND IMPACT ASSESSMENT

ENVIRONMENT PROTECTION AUTHORITY

Date: 24 November 2022

Submission 185

Archived: Monday, 28 November 2022 9:11:57 AM

From: [Ward, Alex \(DEW\)](#)

Sent: Thursday, 24 November 2022 4:53:29 PM

To: [Jim Gronthos](#)

Subject: RE: E-mail to DWE - Consultation by the City of Charles Sturt on the West Lakes Residential and Mixed Use Draft Code Amendment

Importance: High

Sensitivity: None

OFFICIAL: Sensitive

Hi Jim,

Thank you for the opportunity for DEW to comment on the West Lakes Residential and Mixed Use Code Amendment. Relevant staff from DEW (including Green Adelaide) have reviewed the Code Amendment and DEW's comments are as follows:

Urban greening/green infrastructure

The Affected Area currently appears to be reasonably well-vegetated (with native, if not indigenous, vegetation as inferred from Aspect Studios report) in an area where the urban green cover is under 20% (Institute of Sustainable Futures and University of Technology, Sydney, 2014, cited in 30 Year Plan for Greater Adelaide, 2017), and decreasing (Amati, M. Boruff, B. Caccetta, P. Devereux, D. Kaspar, J. Phelan K. and Saunders, A., 2017, pg. 55).

Further the City of Charles Sturt has been identified as being in most vulnerable category on RMIT University's Vulnerability to Heat, poor Health, Economic Disadvantage and Access to green spaces (VHHEDA) Index (Ibid., pg. 54)

The 30 Year Plan for Greater Adelaide includes the following target and policy in relation to urban green cover and retaining biodiversity:

- Target 5: A green liveable city - Urban green cover is increased by 20% in metropolitan Adelaide by 2045
- Policy 97: Minimise or offset the loss of biodiversity where this is possible and avoid such impacts where these cannot be mitigated (for areas not covered by the *Native Vegetation Act 1991*).

The above suggests that the proponent should seek to preserve as much of the existing vegetation as possible.

The Code Amendment variously argues it meets the biodiversity, open space and green infrastructure policies in the 30 Year Plan by virtue of:

- the proposed Concept Plan, which shows indicative public open space (commendably 20%) protecting an area of high biodiversity adjacent Mariner Reserve and providing green pedestrian and cyclist linkages to existing recreation areas and walking/cycling paths
- *the future local road network will provide opportunities for street tree planting and greenways connecting to the adjoining local road network, and*
- the application of the Urban Tree Canopy, and Regulated and Significant Tree Overlays, claiming that they will *provide a policy framework to increase canopy cover over the Affected Area and retain existing trees.*

However, DEW questions if the draft Code Amendment goes far enough to retain and enhance urban green cover for the following reasons:

- The assessment and report by Arborman Tree Solutions is limited to an assessment of the value of the 16 regulated or significant trees under the PDI Act only, rather than a more extensive assessment of the value (including biodiversity, canopy and amenity value) of the vegetation (planted, introduced or native) on the Affected Area per se.
- Further, of the 16 regulated or significant trees identified, the report concludes that only 10 are *worthy of consideration for retention if they can be adequately protected in an otherwise reasonable and expected development.*
- Aspect Studios' open space investigations, in turn, have a focus on open space for recreation, rather than protecting urban green cover, and has reflected the Arborman Tree Solutions' limited assessment of the value of regulated and significant trees only in the Affected Area, rather than undertaking an assessment of the value of the existing vegetation on site, while acknowledging:

Other trees that are not regulated or significant but have a high visual amenity and are located in areas that are anticipated to become public or private open space should also be considered for retention in the concept via a future land division application wherever possible (Aspect Studios, pg. 94).

- While the Concept Plan and not least the proposed 20% open space and the proposed Urban Tree Canopy, and Regulated and Significant Tree Overlays are commended, the Code Amendment will, by facilitating urban development where there is currently green space, lead to a reduction in urban green cover in an area that can ill-afford it.
- While the distribution and quality of urban green cover is arguably more important than the quantity, facilitating a reduction in urban green cover would none-the-less seem inconsistent with the urban green cover target and Policy 97 in the 30 Year Plan.

So, again, DEW questions if the draft Code Amendment goes far enough to retain and enhance urban green cover and, in turn amenity and urban biodiversity.

Given the existing vegetation on the Affected Area, it would seem to lend itself to fewer dwellings in a park-like setting (similar to Lochiel Park at Campbelltown) that retains more of the existing vegetation in public and, potentially, private open space, that not only provides important recreational opportunities, but also enhances amenity and urban biodiversity, providing essential habitat and refuges for native fauna and flora.

Green Adelaide welcomes any opportunity to improve understanding and capacity in best practice Biodiversity Sensitive Urban Design (BSUD) in the development of new residential and non-residential uses, pedestrian and cycle access ways, the local streetscapes (existing or any proposed that may be required to support the development) and public open spaces.

Stormwater management and flooding

DEW (including Green Adelaide) supports the application of the Stormwater Management and Hazards (Flooding – General) Overlays over the Affected Area.

Please don't hesitate to contact me if you have any queries,

Kind regards,

Alex

Alex Ward

Senior Planning Officer

Planning and Assessment/Environment, Heritage and Sustainability

Department for Environment and Water

P (08) 8463 5663

Unit email: DEWPlanning&Assessment@sa.gov.au

81-95 Waymouth St, Adelaide, SA, 5000

GPO Box 1047, Adelaide, SA, 5001

environment.sa.gov.au



**SOUTH
AUSTRALIA**



Government of South Australia

Department for Environment
and Water

Helping South Australians conserve, sustain and prosper

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From: Jim Gronthos <jgronthos@charlessturt.sa.gov.au>

Sent: Monday, 26 September 2022 12:54 PM

To: Ward, Alex (DEW) <alex.ward@sa.gov.au>

Subject: FW: E-mail to DWE - Consultation by the City of Charles Sturt on the West Lakes Residential and Mixed Use Draft

Code Amendment

Hi Alex,

Forwarding this to you in De'Anne's absence.

Thank you and kind regards

Jim Gronthos
Senior Policy Planner
Urban Projects

(Monday to Thursday)

T: 08 8408 1265

M: 0491 317 281

www.charlessturt.sa.gov.au

From: Jim Gronthos

Sent: Monday, 26 September 2022 11:47 AM

To: De-Anne.Smith@sa.gov.au

Subject: E-mail to DWE - Consultation by the City of Charles Sturt on the West Lakes Residential and Mixed Use Draft Code Amendment

Dear De'Anne,

Please note that the West Lakes Residential and Mixed Use Draft Code Amendment will be released for consultation on **Wednesday 28 September 2022 until Thursday 24 November June 2022**, with a public meeting scheduled for early 2023 (date to be advised following the local government elections).

Enclosed is an information brochure summarising the proposed policy amendments and details of the public consultation process, including how you can submit your comments. Please also see the attached Notice as required under Regulation 20 of the *Planning, Development and Infrastructure (General) Regulations 2017*. The Notice provides details of the land which is specifically impacted by the Code Amendment, including a description of the impact on that land. The Notice also provides details of where you can inspect the draft Code Amendment and information about other consultation which will occur on the draft Code Amendment.

Consultation will take place in accordance with the Engagement Plan prepared by the City of Charles Sturt and as required by the Community Engagement Charter under the Act.

The Engagement Plan, draft Code Amendment and supporting documents can be inspected online from 28 September 2022, on the SA Planning Portal at https://plan.sa.gov.au/have_your_say/code_amendments or at www.yoursaycharlessturt.com.au

A copy of the Community Engagement Charter can be found at the following link
https://plan.sa.gov.au/resources/planning/community_engagement_charter

The consultation involves an eight (8) week period.

Please provide any comments on the draft Code Amendment by **5.00pm on Thursday 24 November 2022** either through the SA Planning Portal or YourSay links above or by email to jgronthos@charlessturt.sa.gov.au or by post to Chief Executive Officer, City of Charles Sturt, Titled 'West Lakes Residential and Mixed Use Draft Code Amendment', PO Box 1, Woodville SA 5011.

Should you have any questions regarding the Code Amendment, please contact me on 8408 1265 or by email at jgronthos@charlessturt.sa.gov.au

Thank you and kind regards

Jim Gronthos
Senior Policy Planner
Urban Projects

(Monday to Thursday)

T: 08 8408 1265

M: 0491 317 281

www.charlessturt.sa.gov.au



The City of Charles Sturt acknowledges and pays respect to the traditional custodians of the land, the Kaurna people of the Adelaide plains.

Go Green - Think before you print

This initiative forms part of our environmental plan

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Submission 186

24 November 2022

Jim Gronthos
City of Charles Sturt
PO Box 1
WOODVILLE SA 5011

Via email: jgronthos@charlessturt.sa.gov.au

Dear Mr Gronthos

RE: CONSULTATION REGARDING THE DRAFT WEST LAKES RESIDENTIAL AND MIXED USE CODE AMENDMENT

Thank you for the opportunity to comment on the draft West Lakes Residential and Mixed Use Code Amendment.

UDIA SA on behalf of its members recognises the key role the City of Charles Sturt has in providing a diverse range of housing typologies within the inner west of Metropolitan Adelaide, noting that within the Council area it is projected residential growth will be over 1,150 people each year requiring up to 500 new dwellings per annum.

UDIA SA has for some time championed and endorsed the strategic rezoning of underutilised industrial and infrastructure land to enable well designed master planned neighbourhoods that provide affordable housing options, ensuring that South Australia's have access to a range of land and housing products, regardless of their income. With the lack of housing supply reaching crisis point, there is urgent need to release more land to keep up with demand and prevent housing prices from further escalating to an unattainable level.

The UDIA therefore strongly supports the proposed rezoning of the Affected Area to the 'Urban Renewal Neighbourhood Zone.' It is recognised that the Desired Outcome (DO1) of the zone seeks:

"...diverse housing options... housing density increases, taking advantage of well-located urban land. Employment and community services will improve access to jobs, goods and services without compromising residential amenity."

This outcome is directly aligned with the UDIA SA's 'Grow, Reform, Build' blueprint for the future policy that supports sustainable population growth. UDIA SA supports the opportunity this rezoning presents to unlock the 19.8 hectares of unutilised land to accommodate in the order of 560 new dwellings.

The UDIA recognises that whilst traditionally the residential dwelling profile in South Australia has been single-storey detached dwellings on large blocks of land, we need to be smarter in how we develop land as the population changes. This Code Amendment provides for a range of allotment sizes and building heights to address the need for appropriate and affordable accommodation

options for South Australians. The UDIA supports the proposed Maximum Building Height Technical Numeric Variations (TNVs) which transition in scale from two storey at the interface with existing dwellings to up to five (5) storeys central to the Affected Area.

UDIA SA also strongly supports the proposed Mixed Use Transition Subzone along the Frederick Road Frontage. The Subzone seeks a range of business and commercial land uses (DTS/DPF 1.1) including:

- Entertainment venues;
- Licenced premises;
- Hotel;
- Consulting room
- Indoor recreation facility;
- Office;
- Shop; and
- Training facility

The Mixed Use Subzone aligns with the UDIA SA 'Grow, Reform, Build' blueprint to actively pursue investment, business and job creation. The subzone provides for a diverse range of land uses to drive economic development in the locality.

The proposed West Lakes Concept Plan depicts an area of future public open space in the order of 20%, which is well above the required 12.5 per cent contribution in the Regulations. The UDIA recognise that South Australia has the highest open space provision requirement in Australia compared to other states that range from 6 per cent to 10 percent. Whilst it is recognised that public open space provides an important recreational, wellbeing and visual amenity aspect to new communities, the UDIA seek to ensure that the amount of open space provided is sustainable from a land economics and maintenance perspective. The UDIA believes development of smaller areas of open space to a much higher standard of usability and visual amenity should be prioritised. Likewise, the scattering of small reserves ensures that a greater number of residents are in closer walking distance to a reserve and can be designed with sustainable maintenance in mind.

For the reasons above, the UDIA strongly support the Code Amendment which will facilitate the unlocking of critical land to meet the high demand of inner metropolitan housing shortage. The UDIA supports the '*Urban Renewal Neighbourhood Zone*' and the '*Mixed Use Transition Subzone*' to encourage the creation of jobs in a walkable community precinct.

Your sincerely



Pat Gerace

CHIEF EXECUTIVE

Submission 187

John Hunter
[REDACTED] Lochside Drive,
West Lakes SA 5021

Dear Sir/ Madam,

West Lakes Residential Mixed Use Draft Code Amendment

I wish to express my concerns with the development of West Lakes and especially the property surrounding the old Port Adelaide Treatment Works. In 1992, West Lakes won the Prix D'Excellence by the FIABC International Real Estate Federation due to the forethought that went into planning out the area (<https://fiabciprix.com/2004-1992-winners/>), and a lot of people bought properties off that rating. When you look around the area prior to the current developments, you could see why, we have or had a lot of green spaces which are not only beautiful but are vital to ensure we are protecting our current environment and our eco-system i.e. natural habitats for our fauna, birds and animals, such as the black cockatoo which migrates to this area on a yearly basis. Green areas are vital to mitigate climate change, with one impact being it helps mitigate the urban heat island effect (i.e. replacing green space with medium/high density buildings ends up causing a localised warming effect, which has a flow on effect that'll increase energy costs and air pollution levels

"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. 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. We notice the growing result of poor planning, whereas people park their cars on both sides of Lochside Drive which means only one car can pass at a time. Lochside Drive is a large road extending way past the Golf course and around to the shopping centre. This causes at the moment a lot of cars using Lochside Drive pass the Treatment plant and at times makes it impossible to turn onto Frederick Road. With the volume of traffic that is in tendered to come from the new development will add to the problem of exiting Lochside Drive onto Frederick Road.

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. 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.

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.

My main issues are summarised in the following:

The Area MUST 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 neighborhood 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 f

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 and a Water Feature - the PINERY

Yours Sincerely

John Hunter

Submission 188

Sue Hunter
[REDACTED] Lochside Drive,
West Lakes SA 5021

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Yours Sincerely

Sue Hunter

Submission 189

Archived: Monday, 28 November 2022 9:58:51 AM

From: [Steve Hammond](#)

Sent: Fri, 25 Nov 2022 12:47:59

To: [Meredith](#)

Cc: [Jim Gronthos](#)

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

Importance: Normal

Sensitivity: None

Hello all, I am in NZ at the moment, hope this submission can be received

Steve

On Wed, 23 Nov. 2022, 3:39 pm Meredith, [REDACTED] wrote:

Sent from [Mail](#) for Windows

From:

Sent: Wednesday, 23 November 2022 3:06 PM

To: igronthos@charlessturt.sa.gov.au

Cc: [Angela Evans](#);

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

Subject: West Lakes Residential 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.

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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.

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

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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

Meredith HUXLEY

■ Lochside Drive WEST LAKES 5021

■

Sent from [Mail](#) for Windows

Submission 190

jgranthos@charlessturt.sa.gov.au
SUBJECT
WEST LAKES RESIDENTIAL MIXED USE DRAFT CODE
AMENDMENT

Sir,

I AM HEARING WITH SOME CONCERN ABOUT THE
PROPOSED DEVELOPEMENT OF THE FORMER
S.A. WATER WASTE TREATMENT PLANT ON
FREDERICK ROAD, WEST LAKES.

AS I HAVE NOT READ THE PROPOSAL OR SEEN THE
PLAN, I CANNOT COMMENT, BUT AM VERY CONCERNED
ABOUT THE FACT THAT ALL THE EXISTING TREES ON
THIS SITE WILL BE REMOVED. INCLUDING SIGNIFICANT ONES
THE TREES ARE HOME AND A FOOD SOURCE TO A
FLOCK OF BLACK COCKATOOS WHOSE NUMBERS ARE
NOT INCREASING.

~~BUT ALL MEANS BUILD BUT AS LONG AS THE TREES
STAY, SURELY THERE IS ROOM TO INCLUDE BOTH.~~

I UNDERSTAND THE NEED FOR HOUSING ETC., BUT
WHO IS GOING TO SPEAK UP FOR THE YELLOW TILED
BLACK COCKATOO?

AUSTRALIA HAS THE WORST RECORD FOR THE
EXTINCTION OF SPECIES BUT HERE WE GO AGAIN
PLANNING A DEVELOPEMENT THAT WILL TAKE AWAY
THE HOME AND FOOD SOURCE OF ONE OF OUR VULNERABLE
BIRDS WHOSE NUMBERS ARE DECLINING IN SA AND VIC
IT SEEMS THAT THERE IS NOT MUCH TRANSPARENCY
IN THIS CASE, THINGS BEING ~~RE~~ REWRITTEN AND DARK
I SAY "HIDDEN" FROM PEOPLE.

THIS AREA SHOULD BE A WATERFRONT
NEIGHBOURHOOD ZONE TO ACCOMMODATE EVERYONE
AND INCLUDE THE BLACK COCKATOO.

YOURS SINCERELY,
MARLENE TIMMS

Submission 191

Chief Executive Officer

City of Charles Sturt

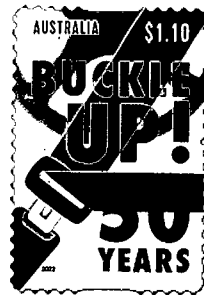
West Lakes Residential

Mixed Use Draft
Code Address

PO Box 1

Woodville

S A



5011

RECEIVED

25 NOV 2022

CITY OF CHARLES STURT

My name is Mary Firth and I currently live at [REDACTED] Lochside Drive West Lakes SA 5021. I want to comment on the proposed change in zoning land opposite to where I live.

I received a letter from Larry Finis and it encapsulates many of my views on the proposed redevelopment of the area of land occupied by SA Water at West Lakes. The area is bordered by existing roads namely Lochside Drive, Frederick Road and Mariners Crescent.

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 that can be charged.

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.

The "West" development was a site that had NO existing housing on any boundaries, so therefore residences never really knew what was actually proposed for that site. However people in the area confirm that there has been lots of changes since the release of the first development plan. It unfortunately is just an ongoing eyesore. The "West Development" is a 10-year development and the developer confirms 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.

The "WEST" development had basically everything there, Shopping Centre, Transport, Community hub, 2 arterial roads, Parks, and it is 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 approval and there will be no umpire or redress by residents to hold the developer to any promises that they may make. Now, there are too many shops, offices etc. and the developers want to add more.

Lastly 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..!

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

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..!

M. K. Firth

Kind regards

Mary Firth (M) [REDACTED] (E) [REDACTED]

Submission 192

RECEIVED

25 NOV 2022

CITY OF CHARLES STURT

My name is Daryl Ireland and I currently live at [REDACTED] Lochside Drive West Lakes SA 5021. I want to comment on the proposed change in zoning land opposite to where I live.

I received a letter from Larry Finis and it encapsulates many of my views on the proposed redevelopment of the area of land occupied by SA Water at West Lakes. The area is bordered by existing roads namely Lochside Drive, Frederick Road and Mariners Crescent.

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Lastly 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..!

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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..!

Daryl Ireland

Kind regards

Daryl Ireland (M) [REDACTED] (E) [REDACTED]

Submission 193

28 November 2022

Chief Executive Officer
City of Charles Sturt
West Lakes Residential and Mixed Use Draft Code Amendment
PO Box 1
WOODVILLE SA 5011

Dear Sir/Madam,

Re: West Lakes Residential and Mixed Use Code Amendment

I refer to the email dated 29 September 2022 received from your office seeking our comments on the above Code Amendment and wish to advise the following:

We note the comments made on page 28 of the draft document under the section "Civil Infrastructure", in respect to the provision of water and sewer services to the subject site. SA Water currently provides water and sewer services to the area subject the above code amendment, however, water and sewer network's augmentation may be required as the proposed rezoning is likely to generate an increase in existing demands.

The extent and nature of the augmentation works (if required) will be dependent on the final scope and layout of the future developments and will be required to comply with the SA Water Technical Standards including those for the minimum pipe sizing (refer to 2nd paragraph of the "Provision of Infrastructure" section on page 2). This advice should be provided to prospective developers.

SA Water is currently undertaking the necessary steps to enable the disposal of a part of the land affected by the above Code Amendment.

Our general comments in respect to new developments or redevelopments are provided below.

SA Water Planning

- SA Water undertakes water security and infrastructure planning that considers the longer term strategic direction for a system. That planning seeks to develop a framework that ensures resources and infrastructure are managed efficiently and have the capacity to meet customer requirements into the future. The information contained in the Code Amendment document regarding future re-zoning and land development will be incorporated in SA Water's planning process.

Protection of Source Water

- Development/s shall have no deleterious effects on the quality or quantity of source water, or the natural environments that rely on this water. In particular, the following conditions shall apply:
 - Landfill shall be outside of Water Protection Zones;
 - Landfill area to include leachate collection facilities;
 - Effluent disposal systems (including leach drains) to be designed and located to prevent contamination of groundwater; and
 - Industry must be located in appropriate areas, with safeguards to ensure wastewater can be satisfactorily treated or removed from the site
- Development shall avoid or minimise erosion.
- Development shall not dam, interfere, or obstruct a watercourse
- The Natural Resources Management Act 2004 includes wide ranging powers over source water quantity issues. The Department for Environment and Water should be consulted, if in doubt, over compliance with this Act. Source water quality issues are addressed by the Environment Protection Authority through the Environment Protection Act 1993.

Provision of Infrastructure

- All applications for connections needing an extension to SA Water's water/wastewater networks will be assessed on their individual commercial merits. Where more than one development is involved, one option may be for SA Water to establish an augmentation charge for that area which will also be assessed on commercial merits
- SA Water has requirements associated with commercial and multi-storey developments as outlined below:
 - Multi-storey developments: For buildings with five stories and above, a minimum of DN150 water main size is required. For buildings with eight stories and above, a minimum of DN 200 water main size is required.
 - Commercial/Industrial developments: A minimum of DN 225 receiving main size is required for sewer and a minimum DN 150 main size for water.

Trade Waste Discharge Agreements

Any proposed industrial or commercial developments that are connected to SA Water's wastewater infrastructure will be required to seek authorisation to permit the discharge of trade waste to the wastewater network. Industrial and large dischargers may be liable for quality and quantity loading charges. The link to SA Water's Trade Waste website page is attached for your information: [Trade Waste Guidelines and Fact Sheets](#)

Thank you for the opportunity to comment on the West Lakes Residential and Mixed Use Code Amendment. Please contact Peter Iliescu, Engineer, Systems Planning Wastewater on telephone (08) 7424 1130 or email peter.iliescu@sawater.com.au in the first instance should you have further queries regarding the above matter.

Yours sincerely,

per Matt Minagall
Senior Manager, Customer Growth
Phone: 08 7424 1363
Email: Matt.Minagall@sawater.com.au