



Major Development Proposal American River Tourist Resort

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name Judy Johnson Address 368 American River Rd. Muston
Telephone 8553 7367 Email mustonheights@bigpond.com

Overall, what do you think about the proposed tourist resort development?

Quite happy - as long as done properly!!!

Do you have any specific comments on the following?

Design quality

Different, but think it's O.K. - interesting!!

Economics - commercial & tourism

We need more commercial input into our town,

Further information

Call - 1800 PLANNING - press option 1

Visit - sa.gov.au/planning/majordevelopments

Email - dacadmin@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure



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Do you have any specific comments on the following?

Infrastructure

No comments, except if the plans are properly done by responsible people!! All should be positive

Social Issues

Positive

Please indicate your preference below:

Please make my submission public (please tick box)

Please do not make my submission public (please tick box)

Written submissions commenting on the DR are invited until 5pm, 3rd November 2016 addressed to:

Minister for Planning c/-
Robert Kleeman, Unit Manager, Strategic Development
Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

or via email to: dacadmin@sa.gov.au

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Name ALAN DAVIS Address LOT 113 REDBANKS RD
Telephone 0407971744 Email ALAMANDA.DAVIS@GMAIL.COM

Overall, what do you think about the proposed **tourist resort** development?

UNDECIDED AS YET AS I AM AN ADJOINING HOME OWNER OF 35 YEARS.

Do you have any specific comments on the following?

Design quality LAYOUT OF MAIN HOTEL ON PROPERTY.
HOTEL IS TOO CLOSE TO REDBANKS RD AND MY HOME. IT IS THE ONLY BUILDING ON THE SITE THAT IS NOT HIDDEN. I HAVE VISUAL, NOISE, & TRAFFIC CONCERNS ON ITS PROPOSED LOCATION.

Economics – commercial & tourism

IT SHOULD BE LOCATED FURTHER INTO THE PROPERTY

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Infrastructure

Social Issues

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Name PETER DENHORN Address 11 Ocean St. Kemmerhaw.
Telephone 08.85531343 Email peter.denhorn.11@gmail.com

Overall, what do you think about the proposed **tourist resort** development?

Very good, a facility that will be appreciated by the LA Community.

Do you have any specific comments on the following?

Design quality

Noted, the 7 storey complex, Council development plan limits height of buildings to 6m.

Economics – commercial & tourism

would surmise that visitors would be better served with the experience of travelling from Adelaide to Cape Jervis by road than travelling from other ports by air be they direct ex Sydney or Adelaide. The marine side of the development is most desirable, a marina essential.

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Do you have any specific comments on the following?

Infrastructure

Water/Power. There is a 4KTS tidal flow at AMR, this should power a tidal electricity generator to power the complex and provide water from a Desal plant. The tidal generator could be housed in a bridge connecting Buck H. to Saffordlow. A bridge would be of immense economic value to KI, put AMR on the main road PSH to KSC and save at least 10km on the trip PSH to KSC. Must be considered for long term.

Social Issues

Should enhance the wellbeing of the AMR community.

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Name Kevin Matthews Address Po Box 111 American River 5221
Telephone 041 789 7715 Email Kevin@camtoplay.com.au

Overall, what do you think about the proposed **tourist resort** development?

Great idea - You are planning it in what I believe anyway is an achievable time frame in stages that will both help it make a profit, and help the township grow in a steady and non-damaging manner.

Do you have any specific comments on the following?

Design quality

Attention to thoroughfare issues going through the local houses to the ocean.

Economics - commercial & tourism

Interested in the marketing of your resort and how it can 'rise all boats' concept. American River has the potential to grow manageably yet not destroy its 'Jewel in the Crown' of KI status. Your marketing can put American River tourism on the map, again.

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Do you have any specific comments on the following?

Infrastructure

Concept of not having staff accommodation will help the resort 'knit' with the community.

Social Issues

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Name A.F. KLEVE Address AMERICAN RIVER
Telephone 0828392944 Email FONKEE@DROPOINIS.COM

Overall, what do you think about the proposed tourist resort development?

*I think this will be a great project
for American River*

Do you have any specific comments on the following?

Design quality

*done the design keeping nature at
it's best.*

Economics – commercial & tourism

*will be a finance boost for
everyone on the Island*

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Infrastructure

Social Issues

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Name JOHN TURNER Address PO Box 17, AMERICAN RIVER
Telephone 0437722649 Email nhis_jtd@yahoo.com.au

Overall, what do you think about the proposed **tourist resort** development?

Positive reservations

Do you have any specific comments on the following?

Design quality

- NEW BUILDING + NEW TRUCK. (2 TOTAL).
- VOLUNTEER NUMBERS TO BE INCREASED.

Economics – commercial & tourism

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Infrastructure

Social Issues

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Name *Russell & Mal Hicks* - Address *53 Bayview Rd,*
Telephone *045 784 7862* Email *mal.hicks.e.hat.mail.com*

Overall, what do you think about the proposed tourist resort development?

*Very Good.
Cannot understand why the Micro Hotel
cannot be relocated further back from
Redbanks Rd. eg. 60^{mts} from Boundary to North
side of Building*

Do you have any specific comments on the following?

Design quality

*This may give a better entry setting
if well vegetated ie keeping a bushlike
setting in keeping with American River*

Economics – commercial & tourism

Very Good

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Infrastructure

Social Issues

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Government of South Australia

Department of Planning,
Transport and Infrastructure

Brenton & Marlene Westley
PO Box 13
Aldgate SA 5154

24 October 2016

Minister for Planning
c/- Robert Kleeman,
Unit Manager, Strategic Development Assessment, DPTI
GPO Box 1815
ADELAIDE SA 5000

SUBJECT: Major Development Proposal – American River Tourist Resort

To whom it may concern,

I am writing to register my comments related to the recently released development report for the proposed American River Tourist Resort.

My interest in this development relates to the property I own situated at 1501 Redbanks Road, American River. You will note that the proposed hotel development is situated directly opposite my property.

While I do not object to the concept of the proposed resort which I believe will be of benefit to the local community, I do object to the specific location of the hotel itself. Based on the plans available the back of the hotel will be approximately 15 metres from the road and therefore within approximately 20 metres of my front door. Being a proposed multi-story building I have a number of specific concerns related to this location;

- My property will be directly overlooked by those guests on upper floors
- Potential noise generated by the general operations of the hotel (air conditioning units, deliveries etc.)
- Potential noise generated by hotel guests in and around the hotel area

As the project has a significant land holding I would recommend that the location of the hotel complex be re-examined and moved significantly further in to the property away from the road.

With the current location of the hotel I am concerned that its closeness to my property will adversely impact my family's ability to enjoy our property.

I am available at your discretion to discuss this matter further as required.

Yours sincerely,

Brenton Westley
Email: brentonwes@internode.on.net
Ph: 0401123259

Philbey, Janine (DPTI)

From: Anne Jackson <gumberlie@gmail.com>
Sent: Thursday, 3 November 2016 3:12 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Submission on DR for American River Resort

Dear Mr Kleeman,

I am a land owner in American River and have been visiting the Island for more than 40 years. I would like to offer the following comments on the proposed hotel development.

Firstly I agree that some development is needed in order for tourists to enjoy the exceptional experience of a visit to KI and for community employment. However, the scale of this proposal demonstrates ignorance and lack of research about the very environment which the company is seeking to sell.

It is completely out of keeping with the Island ambience and ecosystem, not to mention infrastructure.

There are various issues here. They have not adequately addressed the destruction of Glossy black cockatoo habitat which IS part of this area. They have not adequately addressed the effect of expansion of effluent management required. They have not adequately addressed the effect of proposed recreational activities such as horse riding on the foreshore.

The very nature of this mass produced tourist experience threatens the pristine and unique nature of this area and may destroy the very things which attract people to Kangaroo Island.

In summary I think that it is a poorly thought through, insensitive proposal which smacks of greed and haste in the effort to extract maximal tourist dollars.

We urge you to carefully consider whether this is the right thing for Kangaroo Island.

Yours sincerely,
Anne Jackson (Ph.D.)

Sent from my iPad

Philbey, Janine (DPTI)

From: Jon & Rosalie Bell <jarabell.ki@bigpond.com>
Sent: Monday, 24 October 2016 7:50 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: American River Tourist Resort

Re: American River Tourist Resort

Our feedback is that we hope this goes ahead. We need some developments like this on Kangaroo Island and it would be especially good for American River – American River has so much potential – just needs money to be spent & infrastructure to be provided. Kangaroo Island’s economy desperately needs a few more residents and a bit more money for a healthy economy. We need more employment opportunities on K Is. We fully support this project.

Jon & Rosalie

Jon & Rosalie Bell
P O Box 365, Kingscote SA 5523
Ph/Fax: (08) 8553 5212
Email: jarabell.ki@bigpond.com

MAJOR DEVELOPMENT PROPOSAL AMERICAN RIVER TOURIST RESORT

David and Glennis Churchill, 111 Scenic Drive, American River, SA 5221
Ph: 0885537216 Email: tadmarton@hotmail.com

OVERALL.

The overall impression is that this will be an enormous asset for Kangaroo Island and the State, but, of course, particularly American River. It will return American River to being the principal town of KI tourism.

DESIGN QUALITY

The quality of design is amazingly innovative. When you consider how conventionally it could have been designed, creating a blot on the landscape; this design creates such a small foot print. In addition the narrow frontages of the building towers allow the eye to see beyond and around to the natural environment. The design, in our view, shows how the developer and the architects have listened to the initial concerns of the community and produced an exceptional design that minimises the impact of the resort on the landscape.

ECONOMICS

The economics of the development itself is entirely a matter for the developer. It is extremely unlikely that an experienced developer would build a venture of this magnitude, without doing due diligence.

The economic impact on the economy of American River will be immense and will revitalise the town, which has been in decline since the GFC. It will add enormously to the recent efforts of the local community to increase visitor numbers to the town by developing walking trails, rebuilding the tennis courts and the rebuild “Independence” project, with its Boathouse and Deck Café.

In the building phase it is hoped that the developer will use as many local trades and suppliers as practicable, which in itself will give a lift to the KI economy. The project will obviously create many employment opportunities both during the construction phase and during its operation. This should create a strong demand for rental accommodation within the town, even though some employees will have onsite accommodation.

As a retired KI real estate agent, I, (David), believe that the project, once confirmed, will have an almost immediate effect on real estate and it is more than likely that American River will have a local boom in prices.

This development should create a synergy effect not only within the town, but through out the Island. It will put American River back on the map, which should also have a positive impact on other accommodation within the town. The volume of visitors will enable smaller business to expand, or become more viable and others to start up. It would encourage the re-opening or creation of a new general store and fuel outlet. The extra

visitors staying at the resort will visit other attractions in the town and beyond and this will spread the tourist dollar. We understand local produce will be used and this will give a boost to KI foods.

INFRASTRUCTURE.

We understand that the supply of water to the site is a matter that the developer has in hand and hopefully the augmentation charge for electricity supply will not be too excessive. However these are matters for the developer. Of local concern would be the impact of extra bus and car numbers on local roads. The main road into and through American River can easily handle extra traffic and is a road under control and maintenance of the Department of Transport (DPTI) and therefore the upkeep does not effect ratepayers. The existing local road would appear to be able to handle the increased traffic, but this would be a matter for the KI Council engineers to determine. It should be borne in mind that according to TOMM figures around 100,000 visitors already visit American River annually. Even if this number were to double we believe we would not be troubled by seeing twice the number of people, cars and buses, if it meant that our town of American River would survive as a town, with employment for the next generation.

SOCIAL ISSUES

We do not see any real social issues that would give concern to residents of the town. In fact it would appear that the development will only have a positive influence. The economy of a town is in our view the life blood of a town. Without a strong economy the town will continue its downturn and this, in itself, leads to social issues.

Consideration should be given, (and already may have), to a potential increased load on the local Country Fire Service and also the Ambulance service, both run by volunteers. If not already part of the design, then certainly an all weather helipad, which could also serve the local community, for emergency medical evacuations to Adelaide.

We strongly support this project.

PS: As requested on the pro-forma we have no objection to this submission being made public.

3 November 2016

Minister for Planning
Attention: Robert Kleeman
Unit Manager Strategic Development Assessment
Planning & Development Division
Department of Planning Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

Dear Minister

**Re: Submission on Development Report
American River Tourist Resort, Kangaroo Island
PUBLIC COMMENT**

We refer to the public notice in the Advertiser on Thursday 13 October 2016 inviting submissions to the Development Report (DR) for the American River Tourist Resort Kangaroo Island project. This project was declared a Major Project pursuant to Section 46 of the *Development Act 1993* on 18 July 2015 and was subsequently amended on 8 September 2016 by removing the commercial harbour components of the original proposal.

We act on behalf of Cleco Nominees No.264 Pty Ltd, owners of land at American River and in particular, Allotment 216 in Filed Plan 181058 and Allotment 201 Deposited Plan 59488 both with frontage to Scenic Drive American River. We have examined the documents comprising the DR and have prepared the attached submission. We have concluded through our investigations that the proposal:

- is undeveloped and inadequate in its detail;
- is unclear in many respects;
- fails to provide responses to the Guidelines;
- does not satisfy the relevant statutory criteria;
- is at odds with the Development Plan;
- is at odds with the special character and amenity of American River and Kangaroo Island; and
- therefore, the proposal does not warrant approval.

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plan@masterplan.com.au

ABN 30 007 755 277
15115LET02



Please do not hesitate to contact the undersigned on 8193 5600 should you require any further information.

Yours sincerely

Simon Tonkin
MasterPlan SA Pty Ltd

enc: Submission to Development Report
cc: Cleco Nominees No.264 Pty Ltd.
Botten Levinson

The Minister for Planning

C/- Robert Kleeman

Unit Manager, Strategic Development Assessment

Dept. of Planning Transport and Infrastructure

Re: Proposed American River Tourist Resort Development Report.

Dear Sir

I have a number of concerns regarding the proposed development.

High-Rise development seems completely contradictory to the way Kangaroo Island is presented to the world.

The development seems largely at odds with other 1st class Kangaroo Island attractions such as the new Western End walking trail.

Most advertising for the Island presents it as a quiet place, enabling close proximity to interesting and varied wildlife, both Terrestrial and Marine and I do not believe that this style of development is consistent with this projected image.

Specific concerns are:

The anticipated numbers of visitors will incur substantial damage to a particularly vulnerable and easily damaged foreshore.

Where is it proposed that horses will be ridden? There are no horse trails and the historical use of the beach for horse riding for a short period by the Linnets resort resulted in severe damage to the coastal strip which took many years to rehabilitate.

The vulnerable foreshore is also the location of the township effluent pumping station and any damage will likely render this even more subject to flooding by high tides. The station was almost inundated in May this year.

If the proposed expansion of this effluent station involves further excavation, the adjacent coastal vegetation is likely to die as a result of sub-surface seawater ingress as occurred when the station was initially built. The evidence of this is clear with the stump remaining of a large Coastal Mallee killed by seawater after the initial installation.

How will increased noise from larger sewage pumps be addressed for the nearby properties?

There is no mention of whether the existing effluent treatment infrastructure can cope with the increased load from over 600 hundred additional people.

The importance of the proposed development area to the endangered Glossy Black Cockatoo cannot be underestimated and it is of great concern that any disturbance whatsoever, of nesting habitat could be contemplated. The proposed storage of run-off water will have significant mosquito implications to both the resort clients and the American River population.

In Summary:

Whilst Kangaroo Island has been unable to offer employment to many residents for many years I do not believe that this style of development will succeed. The proposed cooking classes and Native Vegetation tourism are ideal but should the 600 visitors materialise then it will be beyond the capacity of the American River Township to cope, especially from an environmental perspective and with the current infrastructure constraints.

Sincerely



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Name S. Y. K. GUTENBERG Address 8 Redbank Rd American River
Telephone 0424458676 Email

Overall, what do you think about the proposed tourist resort development?

This development should not be in town boundaries 39m high buildings encroaching on residents & wildlife (glossy black cockatoos) there is plenty of land available elsewhere in the district that will not affect people's environment

Do you have any specific comments on the following?

Design quality

Having seen the picture of the motel building 39.4m high (made from Chinese materials (BAD)) is totally unacceptable in a country environment not to mention noise e.g. air-cond pumps, buses, trucks, etc

Economics – commercial & tourism

As accommodation & restaurant owners we feel a large scale development that can do budget rooms and large scale food will be detrimental to local business possibly forcing closure & further breakdown of the community. Tourists of this type do not spend money here they just come in and out locals will see little of this money just like everywhere else

Further information

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Do you have any specific comments on the following?

Infrastructure

American river is a small community and does not suit any large scale development particularly in the residential area
This gold-coast style development is ugly and badly designed a more eco-friendly project would suit better
We ~~will~~ do not need to listen to water-trucks, deliveries, tour buses, outdoor music venues on the roof destroying a peaceful holiday village style environment

Social Issues

Increased traffic on small local roads
Pressure on a fragile environment eg. glossy black cockatoos
Minimal work for islanders as these places always use imported workers

Please indicate your preference below:

Please make my submission public (please tick box)

Please do not make my submission public (please tick box)

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Department of Planning,
Transport and Infrastructure

Philbey, Janine (DPTI)

From: Kathie Stove <kathie@inwriting.com.au>
Sent: Thursday, 3 November 2016 10:10 AM
To: DPTI:PD DAC & Major Developments Panel
Subject: submission American River Tourist Development

Major Development Proposal American River Tourist Development

Submission from Kathie Stove
21 Trethewey Terrace Penneshaw 5222
0417 086 870
kathie@inwriting.com.au

Overall I think this is an acceptable development. I congratulate the architects for their consideration of the location, topography and environment, and for coming up with a proposal that fits in with those considerations.

I am particularly pleased to see care for Glossy Black-cockatoo habitat and the revegetation plans using Kangaroo Island native species suitable for the local American River environment.

I know that some discussions have taken place with the Natural Resources Kangaroo Island Nursery. I strongly recommend the nursery as the source of the plants to be used as the tubestock grown there is of exceptionally high quality and with detailed knowledge of local conditions and species. I would recommend ordering plants now (before Christmas) so that some can be planted next winter in areas that will not be affected by building works. As the plants are grown to order, this time lag has to be taken into account.

I suggest that a system for composting be implemented for all kitchen food waste. If enough water is available, a kitchen garden would be a good idea.

Kathie Stove, in writing
0417 086 870
www.inwriting.com.au, inwritingki.wordpress.com

30 October 2016

Minister for Planning
Attention: Robert Kleeman,
Unit Manager Strategic Development Assessment
Planning and Development,
Development Division Department of Planning, Transport and Infrastructure,
Ground Floor,
101 Grenfell St,
Adelaide

Via hand delivery
and email :
dacadmin@sa.gov.au

Dear Sir:

American River Tourist Resort, Kangaroo Island

I am the owner of No 2 Scenic Drive, located in the centre of American River. I have considered the proposal and have 3 specific concerns, which are likely to also effect & therefore concern other residents.

These are as follows:

Stormwater

Stormwater from the catchments above my property is currently collected and then channeled through a stormwater pipe underneath the intersection of Scenic and Tangara Drives. That pipe discharges into a creek that runs between my house and the CFS station and empties directly into the sea, in front of the bird hide. It attracts water and birdlife.

Over recent years the creek has been eroded by storm water flows, culminating in significant damage with this year's large rain events. In September and October stormwater was discharged with such force that a large area of bank alongside our house collapsed. The creek was within centimetres of breaking its banks, endangering my home. I have attached some photos.

The proposed development will generate additional runoff in the catchment area. The proposal speaks in general terms about containing stormwater, and if necessary, discharging "to a designated legal point of discharge either within the road reserve or to the existing watercourses within the site". My concern is that any such discharge, in a major event, has the capacity to cause damage to the beds, banks and outlet of the creek and downstream flooding, including to my house. Even a regular increase in stormwater flows, short of a major event, is a serious concern. If there is any more erosion there is a large tree which will be at risk and likely cause significant damage to my property in the event it collapsed into the eroded creek.

Increased stormwater flows are also a consideration with any upgrade to the existing roads. As referred to below, there is likely to have to be such upgrade to deal with the large increase in traffic that would be associated with the development.

Traffic

The entry to my house is via an unsealed track, just back from the intersection of Scenic and Tangara Drives. That entry serves 3 houses. It is already a tricky entry, but it will become much more so with the planned increase in traffic passing through that intersection.

Sewerage

The proposal accepts the need to upgrade the current public pumping system. I assume that is a reference to the pumping station alongside the CFS shed, adjacent to the bird hide. That pumping station is directly across the creek from and we hear it when it starts up. The proposal does not specify how much more capacity is required and how much visual, noise and sound intrusion that is likely to create.

I request a detailed answer from the proposed developers in relation to each of these issues.

Sincerely,

Alan Lindsay

1 Omar Place
Unley Park, SA 5061
Phone: 0488 070 369
E-Mail: alial@rightleft.com.au









Philbey, Janine (DPTI)

From: moragh crebbin <moragh.crebbin1@bigpond.com>
Sent: Sunday, 30 October 2016 2:18 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Regarding the American River proposed 'Hotel Resort'.

1. Has an enviromental study been taken. (a) Sewerage infrastructure. (b) Water. (c) Can electricity network cope. (d) Can a local very small c.f.s. cope with a fire,ie water manpower. (2) Who is paying for roads kerbing etc. (3) Is it Council (our money) or State Govt,(also our money). (4) There are significant stands of Sheok and Casurina Trees on proposed property, and also Redbanks Road and Thomas Roads perimeter. These are the natural habitat of the Red Tail Glossy Black Cockatoos. If these trees are threatened,do you realise there must be consequences. (5) Does the developer realise that our Chinses friends stay in Australia on average seven to ten days maximum. Will they spend this in American River. Timewise expense wise one or two days at best. (6) A prefab resort says it all,no building jobs,or local jobs. An eyesore plus blot on our hillside. (7) If Mercure in American River struggles seasonally,what about a PreFab 3 Star, without pool,Tennis Court or will they use ours. (8) What are visitors going to do. There are no close Swimming Beaches,or are they just gooing on day trips. If so there is plenty of accommodation already on Island. (9) N.B. Wirrina REesort has struggled through Twenty odd years. (10) We believe this will be another White Elephant. To go with Emu Bay Resort,and numerous Ferry operator schemes. (11) How much money has our Council and State Government promised towards this and Paul Mercer. (12) The reason we decided to Retire to American River was for the peace and quiet,lovely rural outlook and wildlife. If this proposal goes ahead this will all be gone,as we live at 13 Longview Road,just behind this proposed Resort and so we are very much against it.

Signed D & M Crebbin
13 Longview Road.

Philbey, Janine (DPTI)

From: moragh crebbin <moragh.crebbin1@bigpond.com>
Sent: Monday, 31 October 2016 4:30 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Re American River proposed Hotel Resort.

1. Has the enviromental study been taken, A Sewerage Infrastructure B Water C Can Electricity network cope D Can a local very small cfs cope with a fire,ie water manpower.
 2. Who is paying for roads kerbing etc.
 3. Is the council (our money) or State Gov (also our money).
 4. There are significant stands of Sheok + Casurina trees on proposed property and also Redbanks Road perimeter. These are the natural habitat of the Red Tail Glossy Black Cockatoos. If these trees are threatened,do you realise there must be consequences.
 5. Does the developer realise that our Chinese Friends stay in Australia on average seven to ten days maximum. Will they spend this in American River.timewise expense wise.
 6. A prefab resort says it all. No building jobs or local jobs. An eyesore and blot on our hillside
 7. If Mercure American River struggles seasonally,what about a prefab 3 star without pool,tennis courts,or will they use ours.
 8. What are the visitors going to do. There are no close swimming beaches,or are they just going on day trips. If so there is plenty of accommodation already on the Island.
 9. Wirrina Resort has struggled through 20 odd years .
 10. We believe this will be another white elephant,to go with Emu Bay Resort,and numerous Ferry operator schemes.
 11. How much money has our council and State Government promised towards this and Paul Mercer.
 12. The reason we decided to retire to American River was for the peace and quiet,lovely rural outlook and wildlife. If this proposal goes ahead this will all be gone,as we live at 13 Longview road. We are very much against this Resort going ahead.
- Signed D & M Crebbin. 13 Longview Road.

Philbey, Janine (DPTI)

From: DPTI:PD DAC & Major Developments Panel
Sent: Wednesday, 19 October 2016 10:35 AM
To: Wood, Jeremy (DPTI)
Cc: Philbey, Janine (DPTI)
Subject: FW: American River Tourist Resort - Release of Development Report for Public Comment

See below comments on American River.

Sara Zuidland

Para-Planner

Development Division - Department of Planning, Transport and Infrastructure

Tel 08 7109 7069 | Fax 08 8303 0753 | Email sara.zuidland@sa.gov.au

From: STUART PURVES [<mailto:spurves1@gmail.com>]
Sent: Wednesday, 19 October 2016 10:33 AM
To: DPTI:PD DAC & Major Developments Panel <DPTI.PDDAC&MajorDevelopmentsPanel@sa.gov.au>
Subject: American River Tourist Resort - Release of Development Report for Public Comment

Good morning,

I have noted the advertisement in the 'The Islander' newspaper promoting the Public Information Session in relation to this development on 20 October at American River.

I have a property and dwelling at Lot 3 Thomas Road immediately adjacent the proposed development, I am also an off Island property owner who resides in Adelaide. You will be aware from the demographics of American River that a large percentage of property owners in American river also live off Island. One weeks notice of the information session for off island property owners is simply not acceptable.

Can you advise when a session will be held on the mainland for the off island property owners as soon as possible please?

Thank you

Stuart Purves

0424145315

From: STUART PURVES <spurves1@gmail.com>
Sent: Thursday, 3 November 2016 12:03 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: American River Tourist Resort - Kangaroo Island - Submission

In relation to the proposed American River Tourist Resort, please note the following:

I am the owner of the property located at Lot 3 Thomas Road American River, based on the drawings provided this is the closest dwelling to the structures on the development site.

In general I am supportive of the American River Tourist Resort initiative and the economic and social benefits that such a development would provide.

I do have several concerns that I would like considered including;

1. Acoustics - the valley that runs down Longview Road and through the development property is known for its amplification and carriage of sound - have any acoustic studies or considerations been made? (noting that more than 50% of the proposed development will be facing into the valley).
2. The visual amenity and proximity to residential dwellings (existing) on Thomas Road appear to be unnecessarily close (approximately 50 metres) - are there more appropriate options to provide a better spatial layout that does not unnecessarily need to impact in such a dramatic manner terms of visual and noise incompatibilities?
3. Thomas Road is in very poor condition (I have been bogged on the road accessing my property in winter). The proposal will have a significant increase in traffic levels on this road and also the southern aspect of Longview Road. What considerations have been made for this including the issues with the current under road drainage overflowing across the road this year? If the road is to be upgraded this should be done so in a manner that is considerate of the significant levels of roadside vegetation that are habitat for Glossy Black Cockatoos , Echidnas and Wallabies. A road design should be carefully planned to maintain the natural environment as far as practical and also have a walking pace speed limit to reduce impact on the native animal population and traffic calming devices to ensure this is not optional. this approach would also be in keeping with the ambience the developers are seeking to achieve.
4. Has consideration been given to the wildlife corridors that run through the development property and intersect with surrounding land parcels? How will these be maintained?

Thank you and please feel free to contact me for any further information. I look forward to your response regarding the issues noted above.

Stuart Purves
Lot 3 Thomas Road
American River
Kangaroo Island
SA 5221
Mailing address;
1 Corbyn Court
Moana
SA 5169
Mobile: 0424 145 315
Email: spurves1@gmail.com



Major Development Proposal American River Tourist Resort

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- 2 NOV 2016

DAC

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name ...ALAN K. RERE EVANS... Address ...1. TRETHEWEY CRT... AMERICAN RIVER
Telephone .0428135610..... Email

Overall, what do you think about the proposed tourist resort development?

NOT REQUIRED. INAPPROPRIATE LOCATION

Do you have any specific comments on the following?

Design quality

They have no regard for the local residents, noise wise, lightning & traffic.

Economics – commercial & tourism

There are people on island who have no interest in tourism and poor business ventures.

Further information

Call – 1800 PLANNING – press option 1

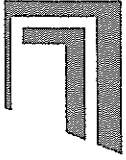
Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure



Major Development Proposal American River Tourist Resort

Do you have any specific comments on the following?

Infrastructure

Social Issues

Please indicate your preference below:

Please make my submission public (please tick box)

Please *do not* make my submission public (please tick box)

Written submissions commenting on the DR are invited until 5pm, 3rd November 2016 addressed to:

Minister for Planning c/-
Robert Kleeman, Unit Manager, Strategic Development
Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

or via email to: dacadmin@sa.gov.au

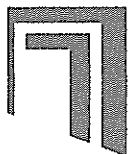
RE MICRO ROUTE

Further information

Call – 1800 PLANNING – press option 1
Visit – sa.gov.au/planning/majordevelopments
Email – dacadmin@sa.gov.au



Government of South Australia
Department of Planning,
Transport and Infrastructure



Major Development Proposal American River Tourist Resort

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- 2 NOV 2016

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Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name AMANDA MATTHEWS Address 113 ROXBANKS RD
Telephone 0407971744 Email ALAMANDA.DAC@GMAIL

Overall, what do you think about the proposed tourist resort development?

POSITIVE I THINK. IF IT WERE ME I'D BUY THE MUSTON HILL PROPERTY 3 TIMES THE SIZE MUCH BETTER VIEWS, NO IMPACT ON THE BLACK COCKATOO'S, OR TOWNSHIP ROADS ETC, BUT STILL CLOSE.

Do you have any specific comments on the following?

Design quality DOES NOT BLEND IN WITH THE COUNTRY FEEL OF AMERICAN RIVER. OK IN THE SCRUB SOMEWHERE, THE AMOUNT OF NOISE WORRIES ME A LOT, LARGE BUILDINGS GENERATE A LOT + TRAFFIC + HUMAN ROOFTOP BAR + EVENTS AREA WORRIES ME GREATLY AND WILL HAVE A BAD EFFECT ON TOWNSHIP AND WILDLIFE.

Economics – commercial & tourism

WILL HAMMER LOCAL B/B'S.

Further information

Call – 1800 PLANNING – press option 1

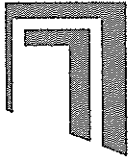
Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



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Major Development Proposal American River Tourist Resort

Do you have any specific comments on the following?

Infrastructure

SHOULD NOT BE BUILT ON THE DEWNR
CRITICAL HABITAT AREA.

THE MICRO HOTEL IS NOT MENTIONED IN THE
PIP MASTERS ENVIRONMENT REPORT, ITS MENTIONED
AS "ADDITIONAL SERVICE BUILDINGS" ?

I DON'T LIKE THE INCREASED TRAFFIC, WATER
TRUCKS, BUSES & PRIVATE VEHICLES, COMING THROUGH
THE TOWN WHEN ACCESS TO THE RESORT CAN BE
~~MAINTAINED~~ GAINED PRIOR TO TOWN.

Social Issues

GOOD BYE TO THE QUIET, PEACEFUL TOWNSHIP
THAT TOURISTS COME HERE TO ENJOY
I AM LOOKING FORWARD TO SEEING HOW THE
BLACK COCKATOO RECOVERY TEAM RESPOND TO THE
MICRO HOTEL CONCEPT

Please indicate your preference below:

Please make my submission public (please tick box)

Please do not make my submission public (please tick box)

Written submissions commenting on the DR are invited until 5pm, 3rd November 2016 addressed to:

Minister for Planning c/-
Robert Kleeman, Unit Manager, Strategic Development
Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

or via email to: dacadmin@sa.gov.au

Further information

Call – 1800 PLANNING – press option 1

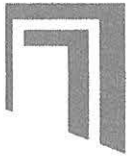
Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



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Major Development Proposal American River Tourist Resort

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- 2 NOV 2016

DAC

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name BRENTON PEASE Address MOREADER ST
Telephone 0459533591 Email

Overall, what do you think about the proposed tourist resort development?

BLOODY ~~IS~~ EYESORE

Do you have any specific comments on the following?

Design quality

INAPPROPRIATE FOR OUR TOWN

Economics – commercial & tourism

WONT WORK GOOD LUCK HAVE A LOOK AT
ALL OTHER BUSINESSES AROUND TOWN, IT WILL
DESTROY THEM.

Further information

Call – 1800 PLANNING – press option 1

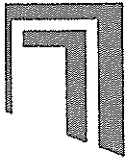
Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



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Major Development Proposal American River Tourist Resort

Do you have any specific comments on the following?

Infrastructure

NOT NEEDED NOT WANTED

Social Issues

NOISE TRAFFIC, EVENTS, LIVE MUSIC
LIGHTING
ON A CLEAR NIGHT I CAN HEAR
THE SOFT FROM PENNINGTON BAY

Please indicate your preference below:

Please make my submission public (please tick box)

Please do not make my submission public (please tick box)

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Robert Kleeman, Unit Manager, Strategic Development
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Department of Planning, Transport and Infrastructure
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Further information

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Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



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Department of Planning,
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2016/04336/01

10951292

Major Development Proposal American River Tourist Resort

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31 OCT 2013

DAC

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name Bronwyn Boodle Address 100 Shepherds Hill Rd Bellevue Heights
Telephone 0438880635 Email bb4@internode.on.net

Overall, what do you think about the proposed tourist resort development?

I do not support this.

Do you have any specific comments on the following?

Design quality

I don't care about the design quality - it shouldn't be there in the first place.

Economics - commercial & tourism

When native species are destroyed then our tourism will disappear.

Further information

Call - 1800 PLANNING - press option 1

Visit - sa.gov.au/planning/majordevelopments

Email - dacadmin@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure



Major Development Proposal American River Tourist Resort

Do you have any specific comments on the following?

Infrastructure

I'm already paying higher rates than some Adelaide Metro councils for the supposed 'infrastructure' that I never agreed to in the first place. I do not support this project and reject any requirement to further fund infrastructure for works I do not agree with.

Social Issues

Our community (including those off island) is based upon respect for our native wildlife and shared goals for the American River township.

Please indicate your preference below:

Please make my submission public (please tick box)

Please do not make my submission public (please tick box)

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Minister for Planning c/-
Robert Kleeman, Unit Manager, Strategic Development
Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

or via email to: dacadmin@sa.gov.au

Further information

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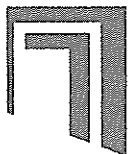
Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



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Major Development Proposal American River Tourist Resort

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- 2 NOV 2016

DAC

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name GRANT PEARSON Address LOT 201 BUICK DRIVE
Telephone 08 455 37446 Email G.P.Org@BigPond.COM

Overall, what do you think about the proposed tourist resort development?

OVERKILL & UGLY DEVELOPMENT

Do you have any specific comments on the following?

Design quality

YOU GET WHAT YOU PAY FOR eg. Pavements in
HINDWEY ST ADELAIDE

Economics – commercial & tourism

DETERIMENTAL TO LOCAL BUSINESS and EMPLOYING
LARGE CORPORATIONS

Further information

Call – 1800 PLANNING – press option 1

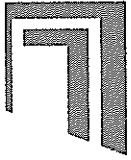
Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure



Major Development Proposal American River Tourist Resort

Do you have any specific comments on the following?

Infrastructure

WHY CHINESE WHAT ABOUT AUST MADE

Social Issues

THE END OF A QUIET FISHING VILLAGE. EXCESS NOISE AND HEAVY TRAFFIC

Please indicate your preference below:

Please make my submission public (please tick box)

Please do not make my submission public (please tick box)

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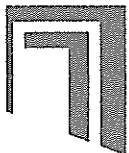
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Email – dacadmin@sa.gov.au



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Department of Planning,
Transport and Infrastructure



Major Development Proposal American River Tourist Resort

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- 2 NOV 2016
DAC

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name K. McQUEEN Address 9 RYBERG Rd.
Telephone Email

Overall, what do you think about the proposed tourist resort development?

IT LOOKS ABIT OUT OF PLACE FOR AMERICAN RIVER
eg HIGH RISE
MICRO
~~FEW~~ HOTEL SHOULD BE RELOCATED INTO THE
CENTRE OF PROPERTY

Do you have any specific comments on the following?

Design quality

GREAT FOR A MODERN CITY
DO THE 10 - 6 STORY TOWERS DO THEY
RESTRICT OR ENHANCE RESIDENTS VIEWS ON
REDBANKS Rd and LONGVIEW Rd. PROPERTY PRICES WILL

Economics - commercial & tourism

↓
DECLINE IN THESE AREAS.

Further information

Call - 1800 PLANNING - press option 1

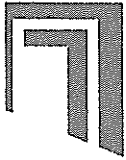
Visit - sa.gov.au/planning/majordevelopments

Email - pladmin@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure



Major Development Proposal American River Tourist Resort

Do you have any specific comments on the following?

Infrastructure

Social Issues

DETRACT FROM RURAL ATMOSPHERE OF
AMERICAN RIVER

Please indicate your preference below:

Please make my submission public (please tick box)

Please do not make my submission public (please tick box)

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Robert Kleeman, Unit Manager, Strategic Development
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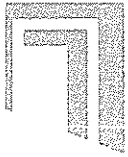
Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure



Major Development Proposal American River Tourist Resort

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- 2 NC / 2016
DAC

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name Lena B. Clark-McFarlane Address 12 Bimberta Ave American River
Telephone 0459 789 174 Email cladif@live.com

Overall, what do you think about the proposed tourist resort development?

It is my belief that the "Proposed" Seven Story building will do nothing for the landscape !!! And, the "Proposed" Roof Top Bar and Music Venues will encroach on Peace and

Do you have any specific comments on the following?

Design quality

Tranquility of American River and it's Residents. The noise level which will carry over the whole of American River will be intrusive and only of

Economics - commercial & tourism

benefit to the Hotel and it's Share holders at the expense of Tax and Rate Payers of American River.

The design will not be in keeping with the neighbourhood, one level would be more acceptable

Further information

Call - 1800 PLANNING - press option 1

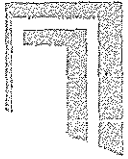
Visit - sa.gov.au/planning/majordevelopments

Email -



Government of South Australia

Environment and Heritage
Planning and Infrastructure



Major Development Proposal American River Tourist Resort

Do you have any specific comments on the following?

Infrastructure

American River is not equipped to handle Commercial vehicles, excess water flow and the disposal of Sewage.
Also a telephone Tower would be an eye sore and detrimental to wildlife and Residents

Social Issues

I feel that I would be Robbed of the very reason that I moved here which is: Peace, tranquility and a Pristine neighbourhood.

Please indicate your preference below:

Please make my submission public (please tick box)

Please do not make my submission public (please tick box)

Written submissions commenting on the DR are invited until 5pm, 3rd November 2016 addressed to:

Minister for Planning c/-

Robert Kleeman, Unit Manager, Strategic Development
Assessment

Department of Planning, Transport and Infrastructure

GPO Box 1815

ADELAIDE SA 5000

or via email to: dacadmin@sa.gov.au

Further information

Call - 1300 30 40 000 - press option 1

Visit - sa.gov.au/planning/major-developments

Email - dacadmin@sa.gov.au



Government of South Australia

Department of Planning
Transport and Infrastructure

28 October 2016

The Minister for Urban Development and Planning

ATT: Manager, Assessment Branch,

Department of Planning and Local Government

GPO Box 1815

Adelaide SA 5001

RECEIVED

04 NOV 2016

DAC

Re: The American River Resort Proposal as a Major Project by Central & City Consulting Pty Ltd

Background

We are residents of American River, having purchased our property in July 2012. Prior to purchasing, we resided on Kangaroo Island in a rental property for two years, whilst we decided where we were going to live.

We were attracted to our home as it is in a quiet area to the north of the main township, with dirt roads, views of Pelican Lagoon, the American River mooring area, majestic trees, screened by trees from most neighbours and abutting land which is currently zoned Rural. Our home is sighted to take full advantage of the views. Before completing our purchase we undertook a due diligence process and investigated the zoning of the land that we overlooked. It was zoned deferred Urban and Rural. Living. We investigated the requirements under the development plan as to building in this area in the remote chance that current available residential land was sold out.

Our investigations found deferred urban was:

- A zone comprising land to be used primarily for broad-acre cropping and grazing purposes until required for future urban expansion.
- Prevention of development likely to be incompatible with long-term urban development, or likely to be detrimental to the orderly and efficient servicing and conversion of the land for urban use.
- Development that contributes to the desired character of the zone.
- DESIRED CHARACTER within the zone - Development within the zone is expected to maintain the 'status quo' and not intensify the use of land, including the division of land, which has been identified as potentially being required for the expansion of existing developed areas. In the meantime, the zone will be characterised by farming development conducted in an orderly manner

The Councils Development plan states:

American River's character is dominated by its mix of residential and holiday homes, which includes small, compact shack development, low density residential homes and elevated homes within a bush setting. Future development will maintain the rural surrounds and native vegetation within the town. Land that accommodates large stands of Drooping Sheoak, which is Glossy Black Cockatoo habitat, should not be fragmented by development or land division. The open nature of the elevated hills alongside the entrance road to the town will be protected to maintain high amenity levels and development will maintain view lines to Pelican Lagoon. The compact holiday shacks adjacent to the wharf will be retained with future development to reflect their existing informal character, siting,

scale and materials. The open space surrounding the shacks will be improved to encourage better use by residents and visitors.

Our Investigations found Rural living Zone was:

- **DESIRED CHARACTER** The zone has a high standard of amenity that will be retained, primarily through extensive vegetation, screening of buildings, structures and uses of land.
- The development of detached dwellings on large allotments is intended.
- Parts of the zone have coastal frontages which feature coastal dunes, which will be protected from excavation and similar interference. Indeed, the natural landform of the zone is valued and further excavation and filling of land is not encouraged.
- Development throughout the zone will be largely self-sufficient in terms of water supply and effluent disposal. To maximise water re-use, development will be expected to provide for rainwater storage and on-site sewage treatment systems that allows re-use of water for irrigation.
- Domestic outbuildings will be considered where accompanied by an application for a dwelling and built in association with the dwelling or on a staged basis consistent with an agreed staging plan for the domestic outbuilding and dwelling that accompanies the application – outbuildings will not be allowed to be used for human habitation.

Furthermore, buildings were unable to be more than 6.5metres in height above ground level and either single or two storey.

With these assurances we purchased our property with confidence that if any development was to occur our views and peace would remain and not be impacted.

The proposal put forward by C & C Pty Ltd is a non-complying development and will have a severe impact on our view and lifestyle.

CONCERNS

The proposed development is less than two hundred metres from our home.

The sighting of eight of the proposed six or seven storey towers (the DR is unclear about this) will be directly in our line of vision, blocking our view of Pelican Lagoon and The American River lagoon.

The DR states:

The resort site covers 33 hectares of varying terrain; flat coastal land rises up to a hilltop of 30 metres The 9 blocks of hotel accommodation have a small footprint creating slender lodges with a height lesser than the mature Gum trees that line the eastern and northern edges of the site. Given this, and due to the rise of the hill on the site, only 1 of the lodges will break the horizon line. That only one of these towers will be visible above the tree line. It also states that six storeys will sit on top of shared facilities

At an estimated twenty five metres in height for six storeys, sitting on top of shared facilities, plus any roof plant and suggested solar panels, these towers will be entirely visible on either side of the ridge at the northern end of the site. Those residents who live to the north and north east of the land will have a view entirely impacted by a number of the buildings.

When we questioned the architect re the height of any plant on top of the towers, he was unable to address this.

Submission re American River Resort S and M Rowley

Our picture windows from our lounge room, dining room, two bedrooms, and entertainment deck will be dominated by the resort towers and an unobstructed view of the proposed entrance to the hotel and its two hundred car park spaces.

I raised this issue with the architect and he said: "I feel very sorry for you, I really do."



View from one of our windows



View from our picture window. Note the metal pole in the foreground. This is the height of a normal house...not six storeys on top of a function centre.

The DR discusses the visual impact of the lodges and cottages from Prospect Hill, Island Beach, Strawbridge Point - all kilometres away, and Buick drive, but nowhere does it address the visual impact of residents to the North and North East of the site. These residents, particularly those on Thomas Road, Longview Road and Redbanks Road will have a massive visual impact.

SITE LAYOUT AND ACCESS

The DR states:

The proposed main vehicular access for the lodges is at the northern most point of the site from Thomas Road, on the hill top, with car-parking provision being sheltered from view by existing vegetation. The Hotel entrance is to be provided in the eastern corner, onto Red Banks Drive. This will also be the main service entrance (housekeeping, engineering, stores). Hotel guests will park south of the hotel in the south west sector of the site. Although it is thought most hotel guests will not come by car.

The proposal fails to take into account the view of residents located to the north and north east of the proposed entrances. These residents will not have a view sheltered by existing vegetation as they are located on land with higher elevation.



The cleared area, where the gate is, is the proposed entrance to the micro hotel. This is taken from our entertaining area.

VISUAL IMPACT 1.3

URBAN PUBLIC CONTEXT & INTERFACE WITH RESIDENTS, BUSINESSES AND OPEN SPACE

The DR states:

The most prominent visual impact of the resort would be from Buick Drive, the road leading into American River. From this point the site is clearly visible, as a piece of degraded open agricultural land, having been cleared of most vegetation. The site itself provides limited natural amenity to the public from this angle, being dominated by existing single-storey dwellings in the foreground.

The American River Master Plan which sets out guidelines for short and long term planning describes the township as a quiet residential and holiday retreat.

The key assets include: the coastal village environment and the outlook to Pelican Lagoon and the hills backdrop and natural habitat for rare and endangered birdlife.

The plan identified key issues and pressures which include: limited infrastructure for the township, in particular water and sewerage, pressure for urban expansion into environmentally and visually sensitive areas and impact on any new development on Pelican Lagoon.

The entrance to American River comprises views of rolling hills and Pelican Lagoon. The agricultural land is very amenable, with pretty rolling hills, low grassed vegetation and dotted throughout with natural scrub. The back drop includes large ancient towering trees. In the foreground are a number of low density houses, all below one storey, which comply with the Council Development Plan of all buildings being less than 6.5 metres above ground level. The existing dwellings totally comply with the “quiet residential and holiday retreat” theme.



A view of the supposedly “degraded land” at the entrance to American River. The lodges will dot these beautiful hills.

Tourism development should ensure that its scale, form and location will not overwhelm, over commercialise or detract from the intrinsic natural values of the land on which it is sited or the character of its locality.

The ten (or nine depending on which page of the DR you refer to) will completely dominate the landscape. They will definitely over commercialise the landscape.

The towers will overwhelm the holiday and permanent houses in the foreground, have views of all their back and front yards and detract not only visually but also from the residents’ privacy.

People live, work and holiday on Kangaroo Island because of its unspoilt nature and its environmental beauty, in fact The Tourism Board recent television adds highlighted this appeal. A development that is not sympathetic with the character of Kangaroo Island as a whole and American River itself will spoil this vision and take away the very essence of what Kangaroo Island is.

In fact, there are no other accommodation buildings, on the entirety of Kangaroo Island that are above two storeys, not including the lobby area to my knowledge. Those buildings that have multiple storeys are located in the main commercial districts of the Townships e.g. Kingscote and American River.



A view of the holiday shacks/residents houses and the backdrop of the proposed resort where ten six storey towers are proposed.

BUSHFIRE

American River is located in a moderate Bushfire zone. Kangaroo Island does not have an MFS. It not only takes a significant amount of water but also specialised equipment and training to fight a tall building fire.

American River has no mains water and the township relies on rain water catchment. To have enough water to fight a fire within a tower, let alone a bushfire would require a significant amount of water storage. Where is the expertise to fight high rise fires going to come from? Who is going to supply the specialist equipment needed and undertake and maintain the trained personnel?

The Kangaroo Island Development Plan states:

Residential, tourist accommodation and other habitable buildings should: (a) be sited on the flatter portion of allotments and avoid steep slopes, especially upper slopes, narrow ridge crests and the tops of narrow gullies, and slopes with a northerly or westerly aspect (b) be sited in areas with low bushfire hazard vegetation and set back at least 20 metres from existing hazardous vegetation (c) have a dedicated and accessible water supply available at all times for firefighting.

The DR states:

The micro hotel is the largest building footprint and has been positioned amongst the tallest trees. Its mass has been broken to step down the hillside and been designed with referencing to the scale, form & materiality of the local environment. With deep terracing on all sides.

It is proposed the hotel and entrance lobby and the wellness centre are to be located very close to mature native vegetation. The Hotel is also located on the slope or rise of a thirty metre northerly ridge.

This is in direct contravention of all recommendations in regards to bushfire mitigation.

The property is located to the south east of a number of residential homes. The most common wind direction in American River is south east. This puts all the residential homes to the north and northwest of the proposed development at a significantly higher risk of fire.

WATER

I note in the DR that the proposal for gaining water is extremely vague and discusses access to water from a yet to be completed private venture (golf course) approximately thirteen kilometres away or from Middle River Reservoir which is approximately eighty four kilometres away. Yet nowhere does it discuss how this water is to be delivered here (except a vague mention of delivery by truck – from where?).

Is there going to be a pipeline? Is this to go through private property? Have any discussions proposals taken place in this regard?

Are there to be rainwater tanks also dotted throughout the landscape? Towers do not have a large surface area for water catchment. Four hundred and fifteen guests, who do not understand water conservation, plus the associated commercial kitchen and bar needs, the requirement for water for the wellness centre and spa and the infinity pool will require mega litres of water .I note that the proposal also discusses festivals for up to two thousand people. These people will also need water. Has this been properly investigated?

The water needs for laundry alone, for a facility of this size needs to be addressed.

A desal plant has also been suggested but what would the cost be to the very delicate ecosystem of Pelican Lagoon – the oldest Aquatic Reserve in Australia?

PRINCIPAL OF SUSTAINABLE TOURISM MINIMISING ENVIRONMENTAL IMPACTS

The DR States:

At a local level, the design of the hotel development fits with the principles to maintain the visual quality of landscapes. Equally the proposed infrastructure and servicing to the site avoids heavy physical impact on the immediate environment by minimising pollution of air, water or land and generation of waste. The proposed use of prefabricated building elements reduces the embodied energy of the development, with concern to greenhouse gas emission and impact on a global level.

Ten towers of six storeys do not fit into the rural landscape. They dominate and over commercialise. The proposal does not expand on how the infrastructure avoids a heavy impact on the immediate environment. It is just a statement with no scientific data.

The logic of building prefabricated building overseas (I was told at the information session – China) is counter to South Australia's economic benefit. We have a climate where Arium Steel has closed down, hundreds of employees in Whyalla and Australia wide are about to lose their jobs and a State Government major project is looking at using Chinese steel, factories and workers.

The DR also states:

Each lodge has its own niche, offering unique facilities. 9 of the lodges have hotel accommodation in 6-storey developments sitting above the ground floor of shared facilities. This reduces the footprint of any 1 building; this is rather than having a building of fewer stories that would have to cover a much larger area of ground, with more potential to be environmentally and visually disruptive. Smaller footprints allows the lodges to nestle into their carefully chosen locations across the site - creating minimal disturbance in any one area.

If the six storey building is sitting above the ground floor with shared facilities, isn't the larger footprint already there? You have a large base covering a large area of ground with a tower! Towers on an Island which has three lighthouses and one set of silos! The lighthouses and silos are all located kilometres from residential areas, not in the middle of residential townships, the proposal is going to be visually disruptive and totally out of character with the seaside holiday atmosphere of American River and the rest of the Island.

SOCIETY

The DR states:

The Design team undertook extensive and informal public consultation. Visiting the River on 5-10 separate occasions over the 5-month design period and undertaking a 100+ page feasibility study. This study was fundamental to informing the development of a proposal appropriate to the social dynamics of the community.

In a separate area the DR also states that ODASA has commended the design team for voluntary public consultation

I find this statement fairly ambiguous....do the Design Team not know how often they came over? There is a marked difference between five and ten occasions. As residents of the area and within two hundred metres of the proposed development we have been keenly conscious and seeking information in regards to the development. At no stage have we been aware of *any formal or*

informal consultation taking place. We are heavily involved in the community and engaged with numerous stakeholders, none of whom have also been consulted.

The only consultation process that we have been able to engage with was the compulsory information session at the Community Shed. This was extremely disappointing as it was advertised wrongly for two different dates and was held on a Thursday between the hours of ten am and four pm. Time frames which virtually guarantee that anyone with employment will be unable to attend, without taking valuable time off their gainful employment. We found this to be far from open and equitable.

There is still a lot of misinformation and lack of understanding or awareness of the proposal within the community of American River, so clearly the consultation process has failed.

The DR states:

The proponents have had early strategic discussion about supporting local landowners to develop their vacant allotments to accommodate these new residents in the community. The exact mechanism for this is still under discussion but it is a very feasible way of using the proposed development as a catalyst for other investment in the River

There are currently a number of vacant residential allotments for sale. There are also a number of residential houses for sale. Rental housing on short and long term basis is also readily available within American River. This does not include existing tourist accommodation. This statement leads me to believe that the Developers are looking to purchase and rezone other land areas currently not zoned residential. Surely the existing real estate should be utilised before any further investigations are undertaken.

The proposal has the facility to host conferences for 400 and potential outdoor events and festivals for up to 1-2000 people.

The township has a number of community areas and existing business which could accommodate a festival for one to two thousand people, as do a number of areas and venues around The Island. The transport infrastructure and the cost of travelling to The Island have not been able to support this sort of venture.

The most vivid and recent example on The Island is the holding of The World Championship Surfing Competition in approximately 2012. It was well supported and advertised, however businesses that took part did not make a noticeable economic benefit.

The local Community Shed has events with bands and two of the local businesses have music on a regular basis.

THREATENED FAUNA

The DR discusses the Glossy Back Cockatoo population, an Australia wide threatened species, and the sub population that resides in American River. It acknowledges that three nest trees occur on the site and it is identified as a critical breeding habitat.

The food source for these birds is the drooping sheoaks. It is amongst these that the micro hotel, two hundred car parking and the wellness centre will be sited. There will also be a three hundred car park for workers etc. nearby.

Two towers or lodges will dominate the sheoaks and the area. With an estimate of four hundred and fifteen guests, conference facilities for four hundred people, up to two hundred employees coming and going and perhaps a festival of two thousand once or twice a year, not to mention the proposed music nights within the hotel on a regular basis, and of course the twelve month to three year phased construction - how will these endangered birds be encouraged to stay?



These are yellow tailed cockatoos from our property.

The DR also discusses the long nosed echidna, the Heath goanna, possums, endangered wallabies and Kangaroos. It states:

Western Grey Kangaroo (*Macropus fuliginosus*) was sighted on three occasions on the site. Tamar Wallaby (*Macropus eugenii decres*) and Common Brush-tailed Possum (*Trichosurus vulpecula*) scats were also found, but no wallabies or possums were sighted. Local residents indicate that these species are not over-abundant, unlike other parts of Kangaroo island but do occur.

I'd like to know who they spoke to and the length of any scientific study they undertook.

Living two hundred metres away we have a red and yellow tailed glossy cockatoos resident, long nosed echidnas constantly crossing our garden, possums most nights, we have Western Grey Kangaroos every night and always see Tamar wallabies on the road and within our garden, if we leave the gate open. In fact we are unable to grow vegetables in an open garden due to the foraging of these native species. The assumption that these animals are not present in numbers is flawed. The construction work, the amount of traffic, pedestrian and vehicular, can only disrupt a very delicate ecosystem and destroy breeding and home sites of endangered and also non endangered species in the area.

NOISE

The DR States:

The proposed hotel development is within a quiet environment.

We agree and that is why we chose to live here. We have at least five neighbours who are closer to the facility and will likely be impacted to a greater extent. We are sure with the increased traffic from guests, tour buses, small tour operators, employees cars, trucks delivering food, chemicals, water, picking up rubbish, local residents visiting the restaurants, bands etc. as planned and all the associated traffic of a busy resort, this will no longer be a quiet environment.

The DR States:

Due to the isolated nature of the various hotel components and their distance from sensitive receivers, upgraded constructions to the accommodation are considered unlikely to be required.

We are sensitive receivers. We chose to live here for peace and quiet. We work shift work. We did not choose to buy a property where we would have constant traffic, construction noise, bands on weekends, tour buses, swimming pool excitement and one to two thousand people gatherings.

The DR states:

Construction activity will not unreasonably interfere with the amenity of the surrounding dwellings when restricted to any day other than Sundays and public holidays and only occurs between the hours of 7am to 7pm.

We chose to live in this area specifically for peace and quiet. We are shift workers. Our weekends are often Monday to Friday. As shift workers we often finish work late at night or early in the morning and noise of construction between 7am to 7pm will severely impact our health and living standards.

Endangered and endemic species will not cope with this activity.

The noise of the expected, and in our opinion, if the resort is successful, underrepresented traffic flow, will be akin to living in a city area, rather than a small seaside community.

TRAFFIC LOAD AND INFRASTRUCTURE UPGRADES

The DR states:

The proposed holiday resort is estimated to generate 50 vehicular trips during the peak hour. The proposed development traffic will result in a significant increase in traffic using Red Banks Road and Thomas Road. It should be noted that the existing traffic passing through this junction during

the peak hour is estimated to be less than 10 vehicles. Considering the junction's current under-use the overall traffic post development will be far lower than its design capacity.

We have significant concern re the traffic prediction and usage of Thomas and Redbanks roads.

We agree that current peak hour traffic is probably less than ten vehicles. Thomas Road is a dirt road that is poorly maintained. It has a junction with Longview Road, which is also dirt. The entrance to Thomas road is on a blind corner. For a couple of hours at sundown and also sunrise persons traversing the road have no visibility as the direction of the sun is directly in your eyes. As a result the probability of a major accident is a huge risk.

Visitors that drive on The Island often have no experience with dirt or country roads or the driving conditions. Overseas visitors are constantly found to be driving on the wrong side of the road.

The proposal expects fifty vehicular trips during peak hour. When is peak hour? In my experience most tourist operators pick up their guest sometime between six am and eight thirty am. These buses arrive back late in the afternoon. Also traversing those roads will be local people, tourist drivers who aren't associated with the resort, Sealink buses, the school bus, transporters delivering food, consumables, employees, rubbish trucks to name a small percentage of users. A blind corner, with the sun in your eyes is a recipe for disaster.

If the planners are correct there is also the possibility of local people and other tourists coming to enjoy the pool, the wellness centre, the restaurants and wine bars. This then becomes an exceptionally busy thoroughfare which is far outside not only the original zoning of the area but also the capabilities of the existing road infrastructure.

Another concern is that the corridor of Thomas Road is lined with drooping sheoaks. As previously mentioned, an important habitat for glossy black cockatoos. The traffic will disrupt them and I suspect that they would need to be cleared to make way for the expected Tourism flow of traffic.



Thomas Road – on the way to the micro hotel, flanked by sheoaks and the corner to Longview road residents.

There are a number of opportunities for vehicular access to the proposed resort along the main entrance to American River, Buick Drive. We fail to understand why the resort planners would chose to channel traffic through the Town, past more obvious and safe entrances, past peaceful holiday and resident homes, up a hill to an unsuitable road with blind corners and sensitive habitat areas.

GUEST VEHICLE ACCESS

The DR states:

The road width proposed is greater than 6m and as such adequate for passenger vehicles to pass.

As previously stated Thomas Road will need to be widened, creating a loss of habitat for the glossy black cockatoos. The car parking that has been proposed for these passenger vehicles is between two lines of planted trees of drooping Sheoak on the crest of the headland. The proposal is to lower the height of the car parking level by circa 700mm using retaining landscaping walls to ensure the car parking cannot be seen from elsewhere on the hotel site, from Buick Drive, or the River. There is no mention of the impact to residents on the north and north east of the site.

HOTEL GUEST AND STAFF PARKING

The main access and parking for hotel guests and staff is on the Northeast of the site mid-way up Red Banks Road.

The DR states:

The parking lying on the south east of the site in a clear open flat space surrounded by trees. This entrance is where servicing vehicles and deliveries for the hotel will be made as larger trucks (with larger turning circles) can be accommodated here. Currently there are c. 150 parking spaces provided here. It is expected that many staff will not have vehicles individually. Staff that live elsewhere on Kangaroo Island and drive to work will use the majority of these spaces.

It is an interesting assumption that staff would not bring their own vehicles if they live in the Community. Why would staff not have individual vehicles?

The proposed entrance is in a hollow on Redbanks Road. This hollow is blind when coming out of Thomas Road. A whole vehicle can disappear into it. Add the sun coming up in the morning and the risk of a major accident occurring is very high.

The entrance here is also for The Wellness Centre. The residents on Redbanks Road who chose to live there with a view of mature gum trees, drooping sheoaks and Pelican Lagoon in the distance will be severely disadvantaged.



This view shows Thomas Rd entrance, right on the crest of the hill. It is concealed and in the afternoon the sun is in your eyes and you are virtually blind. The reverse occurs in the morning.

CONCLUSION

We are very supportive of growth for Kangaroo Island and believe that without new business enterprises The Island and its people will suffer.

This proposal is not sympathetic with the environment, our native and endangered species, the local residents and existing holiday makers, the true character of Kangaroo Island or to the town of American River itself.

It is a noncomplying development within the current zoning.

The developers and planners have totally ignored the residents and holiday makers to the north, northwest and west of American River.

The proposal itself is very vague and lacks concrete detail. In a number of places it contradicts itself, e.g. ten lodges or nine, water trucked in or from a private owner or from Middle River Reservoir or self-collection, to name a few instances.-

We have spoken to a number of the local businesses owners and they have not been consulted. We do not know one resident that has been consulted.

We find that there is no substance to the DR and it makes assumptions that are not backed up with facts, science or economic studies.

Submission re American River Resort S and M Rowley

The risk to our endangered species, resident in the area, is huge.

We haven't even addressed the very real risk of run off into a very important marine ecosystem, the oldest Aquatic Reserve in Australia and soon to be gazetted as a Marine Park.

We also have very real concerns re power availability, sewerage capabilities, grey water etc. but have insufficient time to explore and address these issues and ambiguities within the DR.

We are concerned that the proposed facility will attract clients who will perhaps take a daytrip to some icons on The Island, such as Remarkable Rocks and Admirals Arch and then spend the rest of their time within the proposed resort, such as occurs in Fiji at Denerau or the various resorts in Bali. This is the very fabric of its design. This will create little economic benefits for the greater population of Kangaroo Island.

The increased traffic and lack of consultation with American River residents has been overstated and is extremely poor. I note that the developers state that our property values will go up....I doubt it! Why would someone buy a property that has a view dominated by ten, six story towers, a view of a car park, the noise of a major hotel and the traffic flow of a very busy municipality, let alone music to all hours of the night and the possibility of festivals on their front door step?

The Mercure Lodge, located right on the foreshore of American River, with outstanding views and room for expansion has been for sale for at least twelve years. This used to be run as a resort and is in the correct zoning for such a facility. Perhaps the developers could buy this and develop their vision here? At least the people living nearby know that this type of development is expected in this zoning.

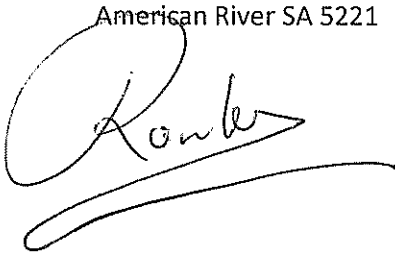
If the opportunities are so great this would seem an ideal solution.

Regards,

Margret and Stephen Rowley

Lot 100 Longview Road

American River SA 5221

A handwritten signature in black ink, appearing to read 'Rowley', with a long horizontal flourish underneath.



Major Development Proposal American River Tourist Resort

RECEIVED

- 2 NOV 2016

DAC

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name Marilyn Hicks Address Bayview Rd American River
Telephone 0457 84 78 62 Email

Overall, what do you think about the proposed tourist resort development?

I am not happy with the positioning of the micro motel on Redbanks Rd. — should be moved into the complex, away from the boundaries by at least 100mtrs and revegetated, so as not to be seen from Redbanks Road. Surely this can be achieved on 80 acres.

Do you have any specific comments on the following?

Design quality

We need more meetings with the community. One meeting is not enough. We need to be informed.

Economics – commercial & tourism

We haven't been given time to think about this. One meeting is not enough.

Further information

Call – 1800 PLANNING – press option 1

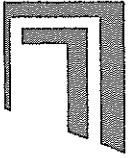
Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure



Major Development Proposal American River Tourist Resort

Do you have any specific comments on the following?

Infrastructure

Social Issues

Please indicate your preference below:

Please make my submission public (please tick box)

Please *do not* make my submission public (please tick box)

Written submissions commenting on the DR are invited until 5pm, 3rd November 2016 addressed to:

Minister for Planning c/-
Robert Kleeman, Unit Manager, Strategic Development
Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

or via email to: dacadmin@sa.gov.au

Further information

Call – 1800 PLANNING – press option 1

Visit – sa.gov.au/planning/majordevelopments

Email – dacadmin@sa.gov.au



Government of South Australia

Department of Planning,
Transport and Infrastructure

SUBMISSION ON THE DEVELOPMENT REPORT
FOR
AMERICAN RIVER TOURIST RESORT
KANGAROO ISLAND

Prepared by



November 2016



1.0 INTRODUCTION

MasterPlan SA Pty Ltd has been engaged to review and comment on the documents that form the Development Report (DR) for “*Tourist Resort American River, Kangaroo Island*” by City & Central Consulting Pty Ltd as varied 22 September 2016.

Given that this proposal has been declared a major project (rightly or wrongly) it must therefore be subjected to very careful assessment, and the proposal must, of course, be thoroughly explained and documented to ensure that careful assessment can be undertaken.

The development of Kangaroo Island to enable quality tourist enterprises to flourish at all levels of the spectrum is highly desirable as set out in the Governments strategies and policies. To do so, each proposal needs careful and detailed scrutiny to ensure it matches with those expectations, that the economic commitment necessary to deliver these outcomes are clearly defined and achievable and the characteristics of the Island that form the foundation for its attraction are protected.

We understand that:

- the proposal was declared a Major Development according to Section 46 of the *Development Act* in August 2015;
- the project has been modified and the Development Assessment Commission has determined the application to be subject to a DR pursuant to Section 46 (7) of the *Development Act*;
- guidelines established for this development have been established to inform the preparation of the DR;
- the DR is expected to address each guideline;
- the DR should detail any effects of the development; and
- the DR should detail the extent to which the development is consistent with Councils Development Plan, the Planning Strategy and any prescription of the Regulations to the *Development Act*.

We have:

- reviewed the documents comprising the DR;
- visited the American River township and locality;
- viewed the subject property from outside its boundaries including photographing the site and locality at an approximate altitude of 1500 feet above sea level;



- considered the provisions of the Council Development Plan, the Planning Strategy and the *Regulations to the Development Act*;
- considered the environmental impacts;
- been made aware of various community concerns;
- considered the marketing and economic implications; and
- assessed services implications and associated risks.

As a consequence of our examination we have formed the opinion that:

- the proposal does not meet the guidelines expectations for the essential information required for a thorough assessment of the development as it does not provide all of the information sought by those guidelines, nor does it provide adequate commentary or analysis on its consistency or otherwise with the relevant policy and legislation, nor does it detail the essential commitments of the proponent to mitigate, manage or control any potentially unreasonable impacts of the development;
- the proposal does not set out any concise summary of these essential elements as sought by the guidelines nor does it provide a level of detail critical to the assessment of the development with fundamental omissions concerning the local commercial environment;
- the design of the buildings and the project master plan is unfinished. There is inadequate clarity and little justification for the building forms as proposed nor is there any discussion as to how this design will “fit” in the context of American River and more broadly, Kangaroo Island;
- the assessment lacks depth in its interrogation of the impacts of the proposal and lacks detail of the project. Given the status of this development as a Major Project, the rigour should be greater than that which may be considered for development pursuant to Section 33 of the *Development Act*. Indeed, it is submitted that for all of the above reasons the DR does not satisfy the relevant statutory criteria. That is, the State Government should not proceed further with the analysis of the subject project as it stands.
- overall, the document is difficult to navigate and lacks order or clarity for ease of use; and
- furthermore, there is no indication of the State and or Local Government’s commitments to undertake various critical works in support of this development. The document is silent on this matter or at the very least the matter is not determined and clearly there are major services issues that affect American River residents and various tourism businesses that are unresolved.



We also note on Page 006 that *"it is intended that City & Central Consulting Pty Ltd will retain ownership and management of the completed project"* whereas page 072 states that *"lodge suites within the lodges will be sold individually."* This suggests that the lodge suites, potentially, may not comprise tourist accommodation. It also raises serious concerns about the adequate provision of services in the event that the project is split up and sold off. The before mentioned statement reflects the many unknowns and lack of clarity as to the form and nature of the proposal.

This proposal will effectively double the population of American River and as a consequence, has significant implications for the existing utility, commercial and social infrastructure. The extent to which these matters have been considered is adequate. The implications for these services, community integration, the environmental and the character of American River deserve more serious analysis.

Our more detailed commentary is set out in the following sections using the Guidelines to assist an orderly consideration of the relevant aspects of the proposal and its assessment. We rehearse the Guideline and the evaluation criteria then provide commentary thereafter.

2.0 CRITICAL ASSESSMENT

2.1 Design Quality

Guideline 1: The American River area has high landscape values (especially associated with the coast) and the township has a 'coastal village' character that provides a high level of amenity for residents and visitors.

Evaluate the visual impact of the resort and how it would integrate with the existing character of the American River settlement and surrounds.

The commentary under the heading 1.1 Visual Impact is very broad and sets a scene based on an analysis that the land is *"degraded open agricultural land, having been cleared of most vegetation."* Refer first paragraph, page 88 of the Development Report (DR). This starting point then differs from other comment about the land regarding the design of lodges on page 90 which states *"the design of the lodges to have small footprints is respectful of the environmental sensitivity of the site."* The following aerial photographs identify the land approximately in the context of its environment. These photographs show the land to have remnant vegetation and like other land in the district does not present as degraded. If the land is so, then there is no evidence of that.



Photograph 1: View looking east over the land and its immediate locality



Photograph 2: View looking west



Further in the first paragraph on page 88, reference to the site is made as follows; *“the site itself provides limited natural amenity to the public from this angle (Buicks Drive view) being dominated by existing single storey dwellings in the foreground.”* The following photograph shows the land as viewed from one location on Buicks Drive



Photograph 3: Panorama from Buicks Drive 8338,8339,8840

At this time, the land forms part of the backdrop to this part of the township. We note this land in the foreground is not fully developed and still affords excellent views into the proposed development site, portion of which is zoned for residential development purposes with an emphasis on single and two storey development only. The Development Plan is particular in PDC 6 of the Residential Zone guiding dwellings not to exceed 6.5 metres above natural ground. This is reflective of the form and scale of development that comprises the established character of the township.

The DR suggests that the towers will have limited visibility. On the information available and the limited analysis undertaken we suggest that the towers will be very visible. It is suggested that the towers will be lower than the gums that line the eastern and northern edges. This statement has not been substantiated with height data of existing vegetation, no view lines or direct comparisons in the DR. The visual impact assessment is entirely inadequate in these circumstances.

The proposed (6 - 7 storey) tower approach is at odds with the existing character of the American River settlement and all of Kangaroo Island. The settlement is dominated by single and two storey development generally on large allotments in a generously vegetated environment. The folding topography of the township results in shorter view lines and distances around the town thus reinforcing the small scale and form of township development which may have assisted the Guidelines authors' perspective in referencing the township as a *“coastal village.”* This character plays a significant part in the *“high level of amenity for residents”* as does its vegetated context, the waterfront, coastal views and the expanse of water of American River and Pelican Lagoon. The following aerial photographs provide evidence of this vegetated township form as it relates directly with the waters of American River.



Photograph 4: View showing vegetated coastal township American River from the north west.



Photograph 5: View of the vegetated coastal township American River fronting the river looking west



The proposed development site is located adjacent to one of Kangaroo Island's world renowned marine sanctuaries and is a principal breeding ground for Australia's highly acclaimed King George Whiting among many other species of marine animals.

Kangaroo Island is a unique environment however its exposure is limited by service infrastructure, access and the real cost of development.

The proposed pre-fabricated multi storey tower buildings are in no way complimentary to the character and unique brand positioning of Australia's Kangaroo Island. Complimentary development that is well serviced will protect this character and uniqueness. Therefore, the commitments to services by the proponent and government is essential to a successful outcome.



Photograph 6: American River and Pelican Lagoon in the background.

There is one reference to silos in a rural setting as a point of comparison on page 92 of the Development Report, which reads as a form of justification for the towers. Silos are typically located on flat land adjacent major infrastructure such as rail, road and port facilities. They are often clustered in banks and often also associated with township centres. This tenuous connection to the rural setting for the justification of the tower elements of the proposal is not explained nor is the argument developed. From an assessment perspective it does not provide adequate "evaluation" as required by the Guidelines.

The site can be viewed from several vantage points to the north including existing dwellings. There is no assessment or analysis provided and as a consequence the evaluation has not been undertaken as required in the Guidelines.



Such external vantage points may have expected the form and scale of development to be consistent with the relevant principles for the Residential Zone. Such an approach would help protect the character of the township and nearby development in particular, by respecting that established character. The DR made reference to views from Buicks Drive and distant views however failed to have regard to the local residential area from which views amongst other characteristics will be impacted.



Photograph 7: View from nearby residence to the north of the site across the subject land.



The height of the proposed development is not in keeping with the planning policies or the overall character of Kangaroo Island. Page 006 refers to "10 lodges of up to seven storeys in height" whereas page 056 states that the lodges will be "6-storey developments." There is no residential or commercial development on Kangaroo Island that is greater than 2 storeys other than a small residential development in the heart of Kingscote that is a 3 storeys in height. The report lacks clarity and consistency. The visual impact of the buildings will be substantial and contrary to the form of development anticipated in the Development Plan. Accordingly, it is critical to the assessment to be clear about their proposal in all respects.

In all, the visual impact assessment is inadequate and incomplete. It fails to recognise the unique character of Kangaroo Island that has been supported in the past by good planning and design principles that were complimentary to the overall brand positioning of Kangaroo Island as Australia's 4th most recognised tourism destination after The Great Barrier Reef, Uluru and Sydney Harbour with its Opera House. The proposal is a major shift from the planning principles established in the Development Plan and those promoted in the past. Further, there is no rationale of substance that suggests that a departure from a low level design approach, that is consistent with the existing character and more readily screened, is appropriate, desirable or essential in these circumstances.

Evaluate the proposal against the Principles of Good Design by Office for Design + Architecture SA, including input from the Government Architect led design review process.

The office of Design Architecture has 6 design principles as set out in the ODASA Design Review Fact Sheet April 2016 2.1.5.

2.2 Context

The first of these principles identifies Good Design having regard to its surroundings, how it responds to adjacent natural and built elements and thus contributes to the character of that environment.

This proposal fails to acknowledge its township setting and the strong character that has been referred to in the Guidelines as "village." The design resolution in this proposal is not founded on this character and is at odds with the concept of connecting people directly with their environment. Most often around the world, on Kangaroo Island and indeed in many of the photographic examples used in the proposal document those projects with an environmental flavour are low level allowing immediate communication between visitor and that environment.



The design and ultimately the architecture, does not create that relationship and is contrary to the character of American River. The Development Plan in the Desired Character for the Residential Zone provides guidance to that character as well as the form and intensity of use. It also makes a clear statement that the type of development proposed is not appropriate to the Residential Zone. This Development Plan resulted from extensive investigations and consultation and is the fundamental planning tool. There is nothing in the discussion that provides rationale for such departure. The lack of substance in the consideration of the Development Plan is contrary to the Guidelines expectations.

2.3 Durability

In addition to durability of the structure and it being fit for purpose, the principle also highlights that the design should *"carefully considers the existing development around it and also promotes the desired future character of the area."* The reference to the character of the area and the Development Plan's Desired Character is cursory at most. As a major project this analysis requires serious and comprehensive consideration and analysis. The DR fails to do so.

2.4 Inclusivity

The proposal incorporates features that enables an integrated landscape design and access. The principle also encourages design that creates *"respect for neighbour's amenity."* There is little said about the relationship between the existing development in the locality and Kangaroo Island in general, and the proposed development. There is little analysis of the effects on amenity including visual amenity on neighbours particularly to the north of the site. Tourists, other than prospective patrons of this development, are also a significant participant in this environment as they enjoy visiting the marine sanctuary, viewing from the land as well as enjoying it on the water in non-motorised vessels as this sanctuary has the importance and status that does not permit motorised craft. No consideration has been made in the commentary on inclusiveness of these as key participants of the area.

2.5 Sustainability

This principle seeks *"the highest environmental imperatives"* ... this proposal lacks detail in the commitment to solar energy, orientation, water management and landscape development and or revegetation. Some general statements are made however there are no firm commitments as it appears the proposal is not well defined. This is emphasised by the disparate design forms and finishes. They are a work in progress and not well enough developed for this stage of assessment. The proposal does not convince the reader that it is achieving or adequately attempting to achieve the principles intent. There are too many unknowns.



2.6 Value

This principle seeks design that, amongst other things, *“responds to the needs of the local community.”* This proposal provides an alternative tourist facility however the need has not been demonstrated. The proposal lacks any detailed *“supply and demand”* analysis or consideration of the competitive environment in which it is proposing to operate. There are a variety of tourist facilities in the town an analysis of or impact upon which has not been prepared. The need has not been enunciated.

2.7 Performance

The performance of the design cannot be assessed at this time as it is not well enough developed and can only truly be tested once on the ground. It appears to be conceptual only. However, although the project may deliver on the clients’ brief, it does not automatically follow what is good in planning terms. Other assessment on its *“fit”* with planning policies and its respectfulness of its locality and the character and amenity of that locality is crucial in this analysis. The proposal, in its design, references many examples around the world in photographic form, most of which have design solutions that are low level, reflecting the human scale and direct relationship and communication with nature or the immediate environment.

The proposal also responds briefly to the commentary by the Associate Government Architect to the Design Review. We note the commentary from the Government Architect as follows:

- recognition and support for the proposal to become a unique destination;
- commendation for voluntary public consultation;
- need for the proposal to *“interface ...with township;”*
- support for differentiation of external form and materials for prefabricated structures and consistency for the separate structures; and
- need for further interrogation to resolve treatments and orientation.

There has been no consultation with certain other tourist facilities operators, contrary to the commendation provided by ODASA. The need for the proposal and discussion regarding the interface with the township as noted by ODASA is clearly inadequate. Further, the design is not well resolved as evidenced in the documents as identified by ODASA as it seeks further interrogation on matters as basic as materials and orientation.

In all, the design is not well enough developed, fails to address the environmental impacts, lacks consideration of the type, cost and responsibility for any essential services and is a form that is not sensitive to the unique character and amenity of this locality.



Evaluate the proposal's relationship within its context, in particular the interface with neighbouring residents, businesses and open space areas around the development site.

As stated above, the proposal has not provided adequate details and commitment as to the implications and relationships with the township. General statements have been made, however, it is critical in this assessment to understand the commitments and the likely implications for the township. For example, we note that there are views and outlooks that form part of the amenity for existing residents that will be affected by the tower design approach but would not be so affected were the development to be of more consistent human scale.

There are also drainage courses that traverse the property one of which is shown on the following photograph. This water course feeds the marine sanctuary seen below and previously referred to in this submission and is therefore critical to its existence. The proposal incorporates development that traverses this course at the upper, western end of the site.



Photograph 8: View east along drainage course toward and across the subject land.

There is little discussion in the document about the extent of vegetation clearance as a consequence of new development, fire track access ways and separation distances from the buildings to ensure a safe environment. In this regard, the proposal lacks sensitivity to the areas it proposes to rejuvenate where not cleared as the buildings in several instances are placed in areas of vegetation or abutting rather than in the open areas of the site. This is counterintuitive to the concept expressed for the conservation and rehabilitation of the vegetated areas.



On page 107, reference is made to the fire access tracks, however, no extent of clearance is defined and the statements are equivocal as to the clearance likely to be required. In essence, it is not yet known what clearance is required.

We also note that there are no services on the island that can fight a multi-storey building fire and as a consequence the risk profile for this development is significant particularly as it is located in a medium bushfire risk area. In fact, there is a lack of detail concerning fire prevention and fire management in terms of both building fires and bush fires. It is noteworthy that Appendix D to the BCA report included minutes of Meeting dated 9 March 2016 where the CFS reports that they have neither the equipment or the training for this type of development and that the State Government should be pushed for replacement equipment and training. This is entirely inadequate for a project of this nature.

There are also important, unanswered questions regarding road access to the resort site. Clause 10.2 on page 160 of the Development Report (to be read in conjunction with the corresponding figure on page 161) refers to negotiations (still to be had) between the proponent and the Council to gain access to the site across the "Council owned road easements." The figure depicts two allotments as "road easement." One (CT 5912/857) is owned by the Council whereas the other (CT 5279/26) is owned by Mark and Heather Gammie. Relevant issues and comments in regard to these allotments are as follows:

- appropriate access to the resort site is an important consideration in regard to the assessment of the major development proposal and this particular proposed access point appears to be pivotal to the resort;
- what is meant by "road easements;"
- is the road to be a private road for exclusive use of the resort;
- it is unclear what access arrangements are being discussed between the proponent and the Council in relation to the access, although it would appear as though an easement interest is being sought;
- no mention is made in the Development Report of any discussions between the proponent and the Gammies;
- both the Council-owned land and the Gammie land are beyond the extent of the major development declaration, meaning that the major development assessment process and rights etc. do not apply to development of these allotments;
- the road construction works proposed by the proponent will require development approval (under the standard development assessment process); and



- the Council-owned land is "*community land*" and would appear to be subject to a community land management plan specifying that it be managed as a reserve. The construction of a road and/or any grant of an easement over this land for the purposes of a private development are clearly inconsistent with that community land management plan. Thus, as things stand, any proposal to take access from the Council-owned land would be contrary to *the Local Government Act*.

In all of these respects the proposal fails to consider its context in terms of surrounding character and built form, the natural features of the site or the capacity of infrastructure and services and access available to the area. Accordingly, the design intentions are misfit with this environment.

3.0 MEDIUM ASSESSMENT

3.1 Economics

Guideline 2: The proposal should make a positive contribution to the commercial and tourism functions of Kangaroo Island and American River.

Provide an economic analysis of the proposal, including the long term economic viability of the project as a whole and its key elements.

There is no rigorous economic analysis provided with the DR. This is a significant and critical shortcoming of the DR. There are general and superficial statements only as to its effects, however, these are neither referenced nor substantiated in a form that supports or provides credence to the broad statements of possible outcomes.

The opening statement under the heading 2.1 Economic Analysis states; "*the proposal will provide much needed good quality accommodation, in a unique manner . . .*" The need has not been evidenced albeit general reference to a "*plethora of reports.*" The section on need on pages 22 to 33 makes broad statements only and reference to general statistics and statements derived from the SA Tourism Plan 2020 however this document is not adequate as the basis for the required economic analysis.

There are good examples where tourism ventures in American River have failed primarily because of a lack of demand, leaving behind developments that have deteriorated and no longer operate. There is no detailed "*supply and demand*" analysis contained in the proposal and one that is done in a way that references existing tourism ventures to ensure that the existing businesses are not cannibalised or destroyed.



Describe the economic contribution of the proposal on Kangaroo Island, including the potential for the project to attract and enhance the business operations of other allied industries and commercial ventures.

The DR does not identify or put in context the existing range of commercial operations. For a description of the economic contribution and potential to enhance allied industries and commercial ventures the identification of the existing facilities and hence the commercial context is essential. No such analysis is provided.

We note that there are numerous tourist accommodation facilities in the American River Township. There is also significant land available elsewhere for expansion of the Kangaroo Island Lodge and other suitably developed areas. Extensive consideration has been given to expansion of these facilities in the past however support for the proposals on economic grounds could not be identified in a wide market search. Many of the reasons are the same concerns that remain today, including the cost of access to the Island, the limitations in infrastructure and services, all of which presumably would be required to be funded by Local and State Governments.

If these circumstances have truly changed and there is support from governments to contribute to the tourist industry financially with improved infrastructure, then there is good cause to consider expanding on existing facilities in an area well established for tourism accommodation purposes rather than taking up land that is defined in the Development Plan for township residential growth. Such an approach would satisfy the guideline without detriment to the character and amenity as set out above.

On the information available in the DR, the economic contribution, favourable or otherwise cannot be assessed. That this is so, further reinforces the point that the DR fails in a number of material respects to constitute a proper DR and response to the Guidelines.

Describe the impacts (if any) on the access to housing and accommodation options within American River and the wider locality for employees of the proposal.

General statements are made that consideration was given to accommodation for staff on site but this has been superseded by the intention to place staff into the township. The proponent refers generally to private land and Council land as possibilities for development of accommodation. We note there is no analysis in the DR on possible accommodation vacancies either in dwellings, or existing tourist facilities. It is also possible that in the start-up some of the existing tourist rooms could be lost to the project thus compromising the tourism offering during those construction periods.

As no analysis has been provided as to the availability of beds, an assessment is not possible to make. It is noted that other tourism accommodation providers in American River have had to provide various accommodation for suitably skill employees to work in these businesses.



Describe strategies to manage and make good the site, should the project fail during the period

The introduction to section 2.6 Mitigation against Project failure on page 103 states; “*work on site, in particular earthwork, will not commence until full planning approval and financing are in place. This mitigates the risk of the project failure between construction commencing and completion.*”

Development Approval is essential to any development occurring and has no relevance as a mitigation strategy. Financing and capacity is a key component to success, however, this too is not of itself a mitigation strategy. The exit from the site are not strategies but rather actions to make good the site. This, however, may be impractical from a strategic point of view as it is more likely that the infrastructure placed and connected to the site would survive and be used in an alternate plan that derives from an alternate development strategy. Accordingly, it is not apparent in the DR that there is a description of strategies to manage the site in the project failure scenario. The scenario of a project failure, leaving behind a number of incomplete and abandoned 6-7 storey towers should be of considerable concern. To this end, there is no mention of the foreign investment and or ownership of this project.

3.2 Infrastructure

Guideline 3: The proposal requires adequate and appropriate infrastructure provision, in particular source of power and water from an existing network that currently has limited supply to meet current and future demand.

Outline the requirements for and likely location of infrastructure for water, power, gas, sewerage, stormwater management, waste management, firefighting and communications systems.

It is acknowledged in Guideline 3 that Kangaroo Island suffers from restricted/limited infrastructure, access and services. These limitations are well known to islanders as the restrictions have impacted decision making, expenditure, access to markets, costs of development and recurrent costs. Previous attempts to expand and develop existing facilities have been made and have been in the public realm. For example, the Kangaroo Island Lodge has previously promoted opportunities for further development on existing land holdings however the cost analysis taking account the location and access criteria have made such propositions unviable. These infrastructure limitations have been fundamental to the constrained development across the island. Clearly it is not unreasonable for the existing American River tourism businesses to gain first opportunity to any assistance made available by or through State, Local or Federal Governments.

The report sets out commentary on each of these and the technical reports associated with these comments are acknowledged. We note that the plans do not detail location of key infrastructure. This is as a consequence of the project plans and layout not being resolved.

There are several key concerns that remain. With reference to each of the services we make the following comments.



3.2.1 Water

There is no reticulated water at this time and SA Water has advised there is no plan to expand the services. Reliance is primarily made on rainwater and stormwater catchment and water tanker until the service to the golf course has been installed (if ever) which requires a pipeline connection to the Middle River dam which is in excess of 60 kilometres from American River. Water can be a scarce resource on Kangaroo Island and security of service for this type of development is critical for its operation and maintenance. The arrangements for supply, the demand and availability of water have been discussed in generic terms without confirmation or particularity necessary to make clear determinations as to its suitability for this project. Furthermore, American River residents and businesses would reasonably expect an equal opportunity to access mains water from the limited water supply at Middle River Dam through the pipeline proposed across public lands.

It is indicated in the Development Report at page 110, that truck delivery of water (and rainwater collection) will be relied upon during phase 1 of the proposal but that *“water will use a reticulated supply off a secure source by phase three, most likely by connecting up to the SA Water network.”* This does not provide the clarity and commitment necessary for assessment.

Water cartage is an expensive and somewhat unreliable source of water on Kangaroo Island and any proposal to use the existing water cartage facilities would further diminish the reliability (especially if subjected to high demands), of this source for American River residents and businesses. This further poses an increased fire risk as a consequence of this limited water supply.

The BCA report annexed to the Development Report states that there is *“the possibility of expansion to the water infrastructure by a private party.”* Presumably this refers to the Golf Course proposal. How will these connections occur and what will happen if the proponent is unable to utilise this infrastructure?

3.2.2 Power

We note the SA Power Networks indicative estimate was provided on the basis of the information from BCA Engineers. BCA and the proponent report that *“there appears to generally be enough electrical capacity for the hotel precinct at the American River substation . . .”* The SA Power Networks correspondence provides estimate of costs for augmentation, process and options and does not comment on the power available at the substation. There are direct costs associated with the immediate upgrade works to the American River power infrastructure and the connecting and site works. These have not been quantified.



Further, no mention of who will pay for any power upgrade works to increase the amount and security of power to this project without further jeopardising the power supply to American River and possibly Kangaroo Island residents and existing businesses given the significant limitations of the service to the Island.

The project demands upgrades to the system locally including the reticulation of the service but does not deal with the broader issue of intermittent services.

The calculation of 1000kVA based on a standard of 8kVA for a residence as applied in calculations by SA Power Networks for other regional projects means that the proponent has relied on the equivalent of about 133 dwellings which is a significantly lower demand than the proposal is intending to create.

We also note that although the project is promoted as a sustainable development there is no real commitment to solar power services. The DR states only that this will be further investigated. Given the islands power limitations and infrastructure constraints and costs, this aspect requires greater consideration.

The electricity infrastructure servicing the Island is aging. It seems the undersea cabling is nearing the end of its expected life. The impact upon supply for current users needs to be understood. The electricity demand of the proposal is uncertain. Note page 108 of the Development Report which states; the estimated demand is in the order of 1,000 kVA but that *"this will have to be confirmed once the design has reached a more developed stage."* The BCA report annexed to the Development Report states that **"continual demand increase will mean that this [i.e. the frequency of power outages] will change over time and the occasional power outage is to be expected."** It is therefore important to know the confirmed maximum demand so that the frequency of these outages and their effect on existing users of electricity in the area can be properly understood.

3.2.3 Gas

We note the proposed LPG gas service which we are informed anecdotally will put further strain on existing gas services There is no commentary on the availability or limitations that may exist.

3.2.4 Sewerage

The details of the existing services are not known. It is acknowledged by BCA report annexed to the Development Report that augmentation will be required. Although discussions have been held with Council, the capacity of the pump station is unknown. There is no commentary on the capacity of the system including the treatment plant and associated storage capacity in particular winter water storage. This is unknown and hence the contribution required for augmentation or inputs from Council and/or others are unknown.



Furthermore, there is no mention of government's guarantees to upgrade the existing services which is of real concern to American River residents who may otherwise be expected to pay increased rates to accommodate these sewer and other services upgrades.

3.2.5 *Stormwater management*

There is discussion on stormwater management in broad terms based on water sensitive urban design. However, given the site will discharge directly into the American River Wetland System (Pelican Lagoon) which is classified as a wetland of significant national significance, greater surety of programs, and systems should be provided. The CEMMP includes generic statements as to sediment control during construction however states that further assessment is needed.

The OEMMP has no detail on stormwater management.

Stormwater management system on the development footprint proposed is inadequate in detail. Environmental impacts both on and off site have not been adequately investigated and no strategies to manage this without having adverse impacts on the environment have been proposed.

The Development Report is very vague as to how the proposal will achieve the key strategies for water sensitive design as set out on page 106.

3.2.6 *Waste management*

A clear waste plan is not defined and re-use and recycling opportunities are said to be investigated. It is entirely appropriate that a project of this nature and status have a comprehensive understanding of waste management outcomes particularly given the desire for a sustainable development philosophy as promoted by the proponent. There are no waste disposal facilities at American River. Given the uncertainty of the proposal, the implications for waste management and resource recovery are unknown. In this respect, does Council plan to accommodate the waste services and how.

3.2.7 *Fire fighting*

CFS facilities and resources are not designed to provide the level of service and protection required to serve multi-level buildings. The proposal is for 6-7 storey pre-fabricated buildings along with other buildings of different scale. Fires in tall structures require particular equipment and capabilities. The design of the project with multiple towers is at odds with the service and infrastructure available on Kangaroo Island.

We also note that as the design has not yet been settled, the fire access routes are not finalised in their location and the extent of vegetation clearance is not known. No surety exists as to whether the access points as set out on page 106 of the Development Report can be facilitated.

There is no detailed fire plan layout and fire management strategy, including detailed water supply arrangements contained in the proposal such as locations of services and storage.



Given the lack of water security, and the limited service that can be provided by the CFS, the proposal is at odds with the creation of a safe environment.

3.2.8 *Communications systems*

We note the intention to connect to existing network and communications infrastructure. The proposal is silent on the capacity for the existing system to be able to handle a doubling of capacity as a consequence of the proposed new development.

3.2.9 *Transport*

In terms of patrons generally, the proposal is mainly dependent upon air travel. There has been no consideration of the prospect of limited or no air travel being available or upgrades to the airport do not progress or airlines failing to take up the opportunity due to lack of demand or costs associated therewith

With this proposal there will be more than a 400% increase in tourism transport to and from American River and there are no traffic studies and road capacity studies that adequately address this matter. Large tourist buses have a significant impact on road stability, wear and tear. There is no mention of the road assessments by Local Government and any commitment by them to upgrade these roads prior to the launch of this new development.

In terms of local traffic, we note the significant topographic sight line issue where Thomas Road and Red Banks Road connect. We note that the plans in the proposal fail to clearly show the other roads that connect to the north of the site. The intersection of these roads and the brow of the hill are noted locally as having particularly poor sight lines and the visibility of traffic is complicated significantly at sunset. This local road design issue has not been noted or referenced in the Development Report or associated traffic impact assessment by InfraPlan. Further the InfraPlan report states no residences have access to Thomas Road west of Long View Road. This is factually incorrect.

As a consequence, traffic impact has been determined incorrectly. There is no safety assessment provided in the Development Report.

3.3 Summary Comments on Infra-structure and Services

In summary on infrastructure, the State Government has rightly in recent times been particular about ensuring there are binding commitments and surety that adequate and appropriate infrastructure agreements are in place as integral parts of development proposals.

This proposal is dependent on significant infrastructure upgrades to be operative (e.g., upgrades to power, water, sewer, transport and storm water) for which there is no apparent binding arrangements in place between the developer and government (local, State or federal), or commitment from the government, for its provision.



In the Development Report, the proponent acknowledges the dependence on infrastructure upgrades. At page 010; *“providing the barriers described above [i.e. transport and infrastructure] can be addressed by both public and private sector initiatives, there are good prospects for rapid growth in tourist numbers”* and importantly at page 033; *“it should be noted that the success of the development will be contingent on the delivery of other infrastructure to the island to support the tourism economy, such as the airport. The consequence of not proceeding with other tourist-focussed development has the potential to undermine the proposal.”*

3.3.1 Project Timing

Infrastructure and impacts of development can be affected by timing or phasing of development. In this regard, the proposal is confused as to the timing. There is vagueness and uncertainty in the Development Report as to:

- the staging of the development. Page 006 (Part 1) refers to construction occurring *“over two to three stages”* whereas page 018 states that the *“hotel resort will be delivered in 3 phases shown on the phasing diagram;”* and
- the phasing diagram referred to would also appear only to depict Phase 1. What about the extent of works and timing of Phases 2 and 3? At the Open Day the proponent’s representative advised that they would proceed with Phase 1 and then see what happens.

Given the uncertainties of the proposal and the infrastructure required and its delivery, it can be argued that the proposal is inadequately defined and is at the very least premature.

Outline the implications of connecting to the power grid for the existing infrastructure and current users.

The proponent has not provided a response to this specific request except in very broad terms that the American River substation can generally provide power based on their estimate of 1000kVA.

Describe an integrated water management strategy, especially Water Sensitive Design measures (including ways in which water use would be minimised), and the use and management of alternative water sources (i.e. wastewater, grey water and stormwater).

The project provides general principles for water management. It is equivocal on the sources of water as it refers to both trucking in water and access to the SA Water network by phase three due to the *“considerable”* demand on water. The SA Water network access is many kilometres away at Middle River Dam. There is no commentary on pipelines, land access or availability of that water. Mention has also been made of access to a private supply resulting from the development of an approved golf course. None of these options are committed or clearly defined. As water is such a critical component to the project a clear understanding of its availability and deliverability is essential.

We also note that the option for reuse of grey water has been discounted.



Describe the impacts of either developing a new wastewater treatment system or disposing to the existing off-site system. Address the expected volume to be treated, disposal method and whether/how it would be managed to maximise reuse/recycling (including storage requirements).

This request has not been answered. No analysis has been made as it has been assumed that connection will be made to the Councils scheme as it is adjacent the site. Notwithstanding this response, there is no assessment or analysis undertaken to determine the likely implications quantities and costs associated with any augmentation to this existing system. Likewise, there is no mention as to who pays and what impacts this might have on the local American River community and the broader Kangaroo Island community. The proposal lacks an adequate response.

Outline how the treatment system elements would be installed, if it is a phased development.

Describe stormwater and grey water management strategies to maximise recycling (including recycled water storage requirements) and the potential impact on groundwater resources, surface water resources.

There is no response to this request presumably based on a decision not to consider treatment systems on site.

Detail the extent to which the facility would generate the need for upgraded infrastructure beyond the site boundaries, especially any broader impacts for the Kangaroo Island community (including strategic implications for Council and/or utility providers).

The DR does not provide the detailed commentary that would be expected for a major project to enunciate the desired infrastructure needs and implications beyond the site.

Infrastructure on and for the Island is well known to be limited and critical. It is well known and accepted that access to the Island is one of these factors. This has impacts on the costs of construction, and costs for residents and tourists.

Power is an ongoing issue for the island as is the provision of water. These are critical to the development however alternatives and implications for the community are not detailed.

4.0 SOCIAL ISSUES

Guideline 4: The proposal is being developed in close proximity to an existing settlement context.

While all forms of development have impacts and will generate change, it is important to consider the manner in which the proposal could make a positive contribution to the social and community fabric of American River and Kangaroo Island.



Describe the characteristics of the American River community (including the nature of their occupancy, such as permanent residents, short-term holiday home residents or with primary production interests).

There is a cursory description of American River that fails to provide an understanding of the range of facilities and services and the make-up of the community in every respect, considering the proposal will effectively double the size of the population of the American River community.

Describe how the community currently engages with the sites and how the development may influence future activities.

There is little or no discussion or considered understanding of the relationship the community has with this land. There is implied access over land to connect the land to Buicks Drive that is not incorporated in the subject land. This access is assumed but is not formalised through the proposal.

Furthermore, this development transverses one of the wildlife corridors to the adjacent marine sanctuary at American River. Corridors that are tracked for flora and fauna species related to the region. This is an example of a lack of awareness by the proponent of the community interest in land in and around American River.

Consider the way in which the broader Kangaroo Island community interacts with the American River settlement and surrounds and how the development would influence future activity.

This proposal does not offer an analysis or structured commentary of the proponent's consideration of American River in the context of the Island other than broad commentary.

Detail the likely size and composition of the construction workforce and employees required during operation, including "on island" support required for this workforce and the direct and indirect employment opportunities for the local community.

The workforce has been identified however the implications on accommodation and services have not been assessed.

Outline the impact on existing tourism and recreation services and facilities (including opportunities for growth or improvement).

There is no assessment in the DR of the impact on existing tourism and recreation services except a comment that the football team may re-establish.



5.0 ABORIGINAL HERITAGE AND NATIVE TITLE

Guideline 5: The proposal is developed in a manner respectful of Aboriginal Heritage, consistent with relevant legislative requirements.

Describe the measures taken in consultation with the Department of State Development (DSD-AAR) to identify the Aboriginal heritage in the project area including the outcomes of:

- *A request for a search of the Register of Aboriginal Sites and Objects maintained by the Minister for Aboriginal Affairs and Reconciliation.*

Searches were undertaken.

- *Discussion with the relevant Aboriginal parties.*

We note that no consultation nor any attempt to consult has been undertaken with Aboriginal representatives. It is claimed that this is due to an amendment to the *Aboriginal Heritage Act SA 1988* being tabled in Parliament. The tabling of an amendment is irrelevant to the duty placed on the applicant to undertake and report on consultation.

- *Engagement of an expert archaeologist/anthropologist to assist with the assessment of any heritage sites.*

An expert has been engaged and a preliminary report that we understand remains subject to review has been provided. It appears that this work is far from incomplete.

- *Describe the measures put in place to manage the risk of damaging, disturbing or interfering with any Aboriginal heritage that has been identified by the consultation undertaken above and any plans to deal with the discovery of Aboriginal heritage during project works. If avoidance has not been possible Page 11 of 21 in the project design phase, details the steps taken in consultation with DSD-AAR to ensure that any unavoidable damage, disturbance and interference is done in compliance with the Aboriginal Heritage Act 1988.*

Measures have been outlined however these have been drafted on the premise that the survey revealed no sites or objects. This is in the absence of any consultation with any Aboriginal party or representative. Accordingly, until such consultation occurs it is premature to resolve the measures appropriate for managing the risks.



6.0 SUMMARY

The Guidelines seek commitments and as a consequence, clarity as to the detailed nature and implications or effects of the proposal. The lack of clarity is reflected in many elements being subject to further investigations, discussions or further resolution or design. This position does not fit the status of the proposal as a Major Project. This lack of clarity has major implications when trying to assess the development in every respect and in accordance with the guidelines and major project status.

A Major Project is determined due to its significance to the community in social, economic and environmental respects. The rigor of investigation and diligence therefore attributed to a Major Project should be a higher order than that one might anticipate for a matter considered assessment pursuant to Section 33.

Our review has concluded that the proposal:

- is structured in a way that is not easily read;
- seriously lacks detail and substance;
- is vague and has inconsistencies;
- is inadequate in addressing the Development Report Guidelines issued by DAC;
- that the DR is, for at least all of the above reasons, a DR that does not satisfy the relevant statutory criteria;
- fails to make commitments of substance necessary for the status and significance of such a project as it may impact on the community of American River and Kangaroo Island;
- lacks serious infrastructure assessment, accountability and commitment;
- fails to address the major environmental implications for a project of this type; and
- is in serious conflict with the character, amenity and heritage of American River, Kangaroo Island and its extensive history.



For all of these reasons the proposal does not adequately respond to or satisfy the Guidelines and is inadequately developed. We invite the authorities to accept that the proposal does not meet the duty and expectations of the Guidelines, is contrary to the Development Plan provisions and fails to consider the character and amenity of American River and the environmental impacts and accordingly the application should not be approved.

Simon Tonkin FPIA
B/A in Planning

3 November 2016



Major Development Proposal American River Tourist Resort

Tell us what you think about the following aspects of the DR.

Submissions will be made publicly available and would be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name Paul & Wendy Crates Address PO Box 2477, Goolwa SA 5214
Telephone 0407 740 860 Email

Overall, what do you think about the proposed **tourist resort** development?

We believe the Development is not in the best position for the environmental situation for the glossy blacks and goannas as we have observed many goannas and glossy blacks on the proposed development land and in the vicinity from our property.

Do you have any specific comments on the following?

Design quality

We are quite disappointed with how the buildings will be created and constructed overseas without utilising local builders and materials, etc. The multi-story development may also detract from the natural environment of the area. Redbanks Road may not be the best choice or the safest decision to enter & exit the development due to overseas visitors not understanding Australian Road Rules as Redbanks Road

Economics - commercial & tourism

can be quite busy.
This proposed development will have a vast interference with current local businesses and will change the peaceful and lovely town of the quaint serenity of American River.

Further information

Call - 1800 PLANNING - press option 1

Visit - sa.gov.au/planning/majordevelopments

Email - dacadmin@sa.gov.au



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Department of Planning,
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Major Development Proposal American River Tourist Resort

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DAC

Do you have any specific comments on the following?

Infrastructure

If the proposed development was to go ahead why does it need to be situated so close to Redbanks Road? Also why can't it be built and constructed further across the land owned by the developer/s?

We are very concerned by the destruction to the natural wildlife and environment.

Also another concern is noise. It is a very peaceful area at the moment but once developed it will become noisy and disturb the serenity of American River.

Social Issues

We are very disappointed with how we purchased our property a few years ago enjoying the peace and serenity of the natural flora and fauna which will now be disturbed by the proposed development of the resort including the multi-story buildings in front of a close to our property.

Please indicate your preference below:

Please make my submission public (please tick box)

Please *do not* make my submission public (please tick box)

Written submissions commenting on the DR are invited until 5pm, 3rd November 2016 addressed to:

Minister for Planning c/-
Robert Kleeman, Unit Manager, Strategic Development
Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5000

or via email to: dacadmin@sa.gov.au

Further information

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