

Darren Keenan

From: Jasper <jasperbt9@gmail.com>
Sent: Thursday, 27 May 2021 12:40 PM
To: Darren Keenan
Subject: American River planning
Attachments: JT submission.pdf

Hello Darren,

Some thoughts rather than a formal submission. I recognise that I am late with this (noting the closing date of 21 May), I'll also miss the second drop-in session as I'm travelling north. Great to see the submissions that have been made, I hope you had a good response to the survey.

Disappointing that some are using the exercise to indulge in wishful thinking rather than practical medium to long term planning options (eg forced relocation at huge cost of RIG and the oyster sheds). There's essential opportunity to have the strategic planning exercise grow entirely in step with the shorter term consultation and consequent work on the 'town centre' area by Council. It would be a shame if the plan weren't entirely consistent with the Council's work and to the extent not so: redundant from the outset.

One matter that will constrain any significant growth in employment opportunities in the township will be housing - a common problem across the Island and most regional areas in the country. If there is one element of a vision that I think can be highlighted for the River, it's to have more younger families living here. The impression I gain is that our permanent population is increasingly constituted by the retired and aged, if we're to have a place that is attractive to small business and that has more life we will need to balance that with younger people, especially families. The problem is that the long-term tenancy options in the River are slim to non-existent, as are relevant opportunities for purchase. I think in our strategic plan we should have a section on working with government (at all three levels) and business to address this. We don't have to do so in a vacuum: we should also in the plan refer to taking opportunities (perhaps public-private partnerships) made available through initiatives focused elsewhere in regional Australia.

This issue was highlighted by the recent changes to the Resort proposal which were most significant in dealing with employee housing. Fyi I've attached my submission, I talk about housing in s3.

On the other side of the housing coin: it would be good if older people could stay in the River rather than feel compelled to move to Kingscote or the mainland. Most importantly: better and more flexible health care options - the recently announced outreach nursing service for KI is a good start.

American River will survive and prosper if it is able to retain its character: its quiet charm, bush meeting the sea - as no doubt most responses will say. We do need (and appreciate) our visitors, and we should do better at encouraging mariners and fisherpeople to visit us. (It would be good if we had a pub...) I'm not terribly creative, I like looking elsewhere for ideas, and will indulge in some virtual travelling to other small sea-side communities that are doing well and not being overrun or abandoned. I'll be in touch again if I find something particularly promising!

Cheers,
Jasper

Jasper Taylor
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Representation on Application

Development Act 1993

Section 46D – Development Report – Major Development

City and Central Consulting

520/P008/20

Amendment to American River Tourist Resort

Development Report

Lot 84 Thomas Road, American River

Janine Philbey 08 7109 7062

7 May 2021

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<i>My interests are:</i>	<i>Owner and occupier of local property</i>

The aspects of the proposal I wish to make comment on are:

Refer following pages.

1. Economics

The proposal has been reduced in scale, which is welcome. The MPA claims that the reduction is “due to feedback from the public notification process as outlined in the original Response Document”. Much more likely is that the reduction reflects the proponent’s improved business sense; the business model for the original proposal having been unreasonably optimistic about visitor numbers and about the opportunities for generating income during the lengthy off season. The likely reduction in visitor numbers from the primary intended international market, China, has almost certainly influenced the plan changes; even so it is quite possible that the revised projections for what in the new proposal is a 4-star resort at best continue to be overly bullish. The claims in the original proposal that the resort could survive the off season through usage of the 400 person conference facility were fanciful. The MPA offers no alternative ground for confidence in the model.¹

The State in making its assessment of the MPA would be advised to take a more realistic approach in its evaluation of the revised business model than it did when it accepted without question the original version.²

For many residents and other landholders in American River a very significant fear is that the business model – and hence the development – will fail either during or after construction. It is the State’s responsibility to exercise due care and foresight when analysing the business model. One aspect of the revised proposal is that it presents a staged construction that would deliver a possibly coherent business outcome with only the first stage completed. That first stage was not assessed by the State in the AR – it is entirely new to the amended resort proposal – and the State should be diligent in assessing this possible stand-alone option (see below, s3).

¹ Why would a mainland organisation hold a conference on Kangaroo Island, with all the travel costs involved, rather than in other South Australian locations (eg the Barossa)? Bizarrely the AR appears to have understood the model as relying on local use: “providing for locals through new facilities for conferences and social events during the ‘off peak season’ to provide a sustainable business model”. Locals have existing adequate conference facilities available to them.

² *“The AR concludes that the proponent has considered the current and potential economic circumstances of Kangaroo Island in relation to tourism, job creation and providing a long term economic strategy for the proposal.”* Ie: the AR concludes that the proponent has a business model, but the AR makes no assessment of that model.

One matter that is not mentioned in the MPA is the effect the reduction of rooms will have on staffing requirements. This required number of staff is highly relevant to discussion on staff accommodation (see below, s3).

2. Design Quality

The State was wholly supportive of the original design, in particular of “the layout of the courtyard, hotel, lodges, cabins and cottages, the separation of the uses into discrete buildings and the built form design’s response to the unique setting”.³ That layout has been radically altered in the amended plans. Aside from the guest vilas the resort has been transformed from an array of discrete buildings to a clump of mostly interconnected multi-story buildings (three of the four buildings are connected with the fourth a very short distance away) which would suit an inner-city situation well, but not a small coastal township.

The AR’s conclusion that “the siting and design of the taller structures have been configured utilising existing vegetation and topography to provide some screening to moderate the visual impact of the structures in the landscape” does not apply to the newly proposed structures. The MPA is very selective in its claims for increased set-back from Redbanks Road (the new building 4 is no further away than the original buildings) and the visual impact as interpreted in the MPA figure 2 fails to capture the effect of the massing of multi-story buildings in a much smaller footprint than previously.

The State should consider carefully the negative aspects of the new design. A further reduction in building height and a return to a theme of buildings discretely separated with good use of existing vegetation and topography to moderate their visual impact would be preferable to this new design and much more in keeping with the nature of the location in American River.

3. Staff Accommodation

The MPA notes that the original proposal made no provision for staff accommodation. Indeed this was an alarming weakness of the original proposal, which unconscionably the State neglected to identify in the AR. All staff were to be accommodated in the township, with (a) the “high proportion of existing dwellings ... only used for a short period of time over summer” being somehow “made available for resort staff on a permanent basis” (holiday house owners would presumably waive their right to use their homes in favour of permanent rentals!), and (b) “there is a high degree of potential for staff to rent bedrooms from or share

³ AR s5.4.2, p27.

with other members of the community”.⁴

The MPA also notes that its preferred model for staffing accommodation is a three-story building, pre-fabricated by Matrix Living Co Ltd, with – as apparent from the Matrix Living plans in the MPA appendix – 52 rooms. 40 of those rooms are in what can be called the ‘main building’, housed in the second and third floors; the remaining 12 rooms being housed over all three floors in an annex. The MPA calls the building, which looks similar to a block of housing commission flats, a “staff village”. Let us settle on the more accurate “staff accommodation block”.

The MPA then states that at the request of the State Planning Commission the size of the staff accommodation block has been “reduced considerably” through the removal of the annex. However: the attached Matrix Living plans have not been altered to reflect the reduction: they include the annex. That is not acceptable.

Equally unacceptable is the MPA’s several disingenuous references to the “staged construction” of the accommodation block. The prior plan may have been to construct the annex later than the main building, but there is no scope for staged construction of the main building as per the “quick and affordable construction project” model used by Matrix Living.⁵

The staff accommodation block has not been assessed for its design quality, its impact on township amenities and particularly nearby residences, nor its environmental impact. The following matters require close scrutiny:

- The block contains rooms for singles or perhaps couples (only), i.e. for 40 or perhaps more staff. It does very little towards addressing the problem of how 280 staff (or slighter fewer, given the reduced resort scope) will be accommodated.
- One desirable outcome of the development would be its providing an attraction for younger families to live and work in American River – there being very few opportunities in the township for that demographic currently. This form of staff accommodation does nothing to address this.
- The MPA claims that the building “will be extensively screened with existing and proposed vegetation planting”. The image referred to shows extensive vegetation to the west of the building whereas the appendix A plan (p4) shows five major trees being removed, likewise to the north (eight trees removed) and east (another eight trees removed). No justification for the

⁴ American River Tourist Resort Response to Submissions, 18 November 2016, p31.

⁵ <https://www.matrixliving.com/>

necessity of this major reduction in existing vegetation is given.

- None of the advantages as assessed by the AR in the manner in which the resort has been designed to minimize impact on local living apply to the staff accommodation block. In addition to its unattractive and obtrusive visual presentation (especially after the removal of 21 trees), it will be noisy, brightly lit at night and busy and almost certainly unpleasant to live near to.

It is regrettable that any positive steps taken by the proponent with the amended resort design have been negated by this poorly thought-out staffing block proposal.

It is also of concern that the staging of the overall development provides the proponent with an opportunity to step back after construction of the staff accommodation block. In essence this building is a Matrix Living hotel and could be used as such: its ground floor has all the standard features of a hotel (lobby, restaurant, meeting room, laundry), and the staff rooms would serve for hotel accommodation (they are larger than the rooms in the main resort buildings).

4. Timing

The Governor's approval, dated 27 January 2017, required the proponent:

1. To commence development within 2 years of authorisation, and
2. To complete development within 5 years of authorisation.

The development failed to meet the first condition, and next January will fail to meet the second condition.

The American River community – its residents and other landowners and its businesses – have lived through the uncertainty of the resort's future long enough. Yet there is no sense of urgency in the MPA, no commitment to a delivery timeframe.

It would be refreshing if the State were to provide certain and unwaivable dates in any approval of the amended development it may give. Assuming that the developer took seriously the current conditions and made preparations accordingly, there is no good reason why an amended development should not be required to commence no later than the end of 2021, with completion no more than two years later – and with certainty of cancellation if these conditions are not met.

Darren Keenan

From: Nada Clark <nadaclark@hotmail.com>
Sent: Thursday, 27 May 2021 11:21 AM
To: Darren Keenan
Subject: Late submission

Hi Darren, I have been rattling my brain thinking of other items to go into the Planning. Not sure if these ideas are there.. From a mere social point of view one would hope that sports gets a mention into the future tennis, softball, basketball netball. Plus of course the things that are still being done... yoga , exercise group and any other eg line dancing, cards etc
Craft groups and art groups established in the hall for weekly gatherings.

Being an older over 60 group I hope that the younger generation are coming up with ideas active playgroup dance etc.

Exercise gym equipment along the foreshore walkway ..

Was a regular doctor, community nurse visit on the wish list ??

Cheers Nada