



**Government  
of South Australia**

**Office of the  
Minister for Infrastructure  
and Transport  
Minister for Energy and  
Mining**

Level 14, 83 Pirie Street  
Adelaide SA 5000

GPO Box 1533  
Adelaide SA 5001

Tel 08 7133 1100

minister.koutsantonis@sa.gov.au

22MIT3386

Mr Rex Patrick  
[rex@transparencywarrior.com.au](mailto:rex@transparencywarrior.com.au)

Dear Mr Patrick

**APPLICATION UNDER THE *FREEDOM OF INFORMATION ACT 1991***

I refer to your application made under the *Freedom of Information Act 1991* (the Act), dated 23 September 2022 to the Department for Infrastructure and Transport, which was transferred to the Hon Tom Koutsantonis MP, Minister for Infrastructure and Transport on the 5 October 2022.

Your application seeks access to:

*“On 5 September, the Premier announced a new location for a new site for the Adelaide Aquatic Centre. I seek access to documents that go to the consideration/analysis of sites other than the Adelaide Park Land (for example, multiple sites suggested by the Adelaide Park Lands Association in an email to Minister Koutsantonis on 13 June 2022), between 21 March 2022 to 5 September 2022.”*

The purpose of this letter is to advise you of my determination. An extensive search was conducted within this office. A total of 8 documents were identified as answering the terms of your application.

I grant you access in full to 4 documents; copies of which are enclosed.  
I grant you access in part to 3 documents; copies of which are enclosed.  
I refuse you access in full to 1 document.

**Documents Released in Full**

1, 2, 3 and 5

**Documents Released in Part**

4, 6 and 7

**Documents Refused in Full**

Document 8

## Documents Released in Part

Documents 4, 6 and 7 are released in part as the documents contains personal contact details and if released would involve the unreasonable disclosure of personal information. I therefore determine this information exempt pursuant to clause 6 to the FOI Act.

## Documents Refused in Full

The author of Document 8 did not give consent to releasing their email.

## Exemption

### ***Clause 6 – Documents affecting personal affairs***

- (1) A document is an exempt document if it contains matter the disclosure of which would involve the unreasonable disclosure of information concerning the personal affairs of any person (living or dead).

Please note, in compliance with Premier and Cabinet Circular PC045 - *Disclosure Logs for Non-Personal Information Released through Freedom of Information* (PC045), details of your FOI application, and the documents to which you are given access, will be published in the agency's disclosure log. A copy of PC045 can be found at the following address: <https://dpc.sa.gov.au/resources-and-publications/premier-and-cabinet-circulars>. Please visit the website for further information.

No fees and charges are payable for this application.

If you are unhappy with this determination you are entitled to apply for an internal review, in accordance with section 29 of the FOI Act. To make an internal review application, please either write a letter or complete *Application for Review of Determination* form, to the Principal Officer of this agency, the Hon Tom Koutsantonis MP, within 30 (calendar) days after you receive this letter.

Should you submit an application for an Internal Review, please include an application fee of \$39.00.

If you require any further information, please contact Vicky Cathro on (08) 7133 1100.

Yours sincerely



**Carly McNeill**  
Accredited FOI Officer

## Schedule of Documents

22MIT3386 - Adelaide Aquatic Centre

Doc. No.	Date	Description of Document	# of pages	Determination Recommendation	Exemption Clause	Reason
1	1/08/2022	Email	1	Released in full		
2		Attachment to Document 1	14	Released in full		
3	22/07/2022	Email	4	Released in full		
4	6/07/2022	Email	1	Released in part	6(1) - Unreasonable disclosure of personal affairs	
5	1/07/2022	Letter	1	Released in full		
6	22/07/2022	Attachment to Document 5	6	Released in part	6(1) - Unreasonable disclosure of personal affairs	Out of scope information redacted
7	3/07/2022	Letter	1	Released in part	6(1) - Unreasonable disclosure of personal affairs	
8	1/07/2022	Email	2	Refused in full		

RELEASE

## DIT:Minister Koutsantonis

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**From:** Shane Sody <shane.sody@gmail.com>  
**Sent:** Monday, 1 August 2022 10:07 AM  
**To:** DIT:Minister Koutsantonis; Adelaide EO; DPC:Premier  
**Cc:** Ruby.Stevens@wsp.com; Ingrid Wangel; Stephanie.Luyks@wsp.com; Hay, Daniel (DIT)  
**Subject:** 22MIT2329 Where to put a new Aquatic Centre? 682 community responses to survey  
**Attachments:** Have your say Where to put a new Aquatic Centre - Survey results 2022-07-31.xlsx

**Categories:** Printed

Dear Premier, Peter Malinauskis, Infrastructure Minister Tom Koutsantonis and Lucy Hood MP

Further to earlier correspondence, I have pleasure in attaching an Excel spreadsheet containing survey responses collected over a period of six weeks.

The survey shows a very large majority of respondents (more than 85%) would prefer a new Aquatic Centre to be located on a site other than the Adelaide Park Lands.

The most-preferred area was an inner north, northwest, or western suburb, with the most frequently recommended area around Thebarton, Hindmarsh, Bowden or Brompton, i.e close to the site of the existing Aquatic Centre.

The advisability of proximity to public transport (eg the tram line, and/or rail) was frequently cited by respondents, along with, of course, the desirability of both restoring the current Aquatic Centre site AND protecting the remainder of Denise Norton Park / Pardipardinyilla (Park 2).

We have summarised these findings in a blog post and newsletter article entitled "When Given a Choice...." published here: <https://www.adelaide-parklands.asn.au/blog/2022/7/31/when-given-a-choice>

I strongly encourage you to review the Excel spreadsheet, including the many free text comments contributed by the survey respondents.

The State Government will be widely praised if you pursue a win-win strategy by protecting and restoring Denise Norton Park, and establishing a new Aquatic Centre on a brownfield site in a near-city suburb. This is the clearly-expressed preference of a vast majority of the survey respondents.

Kind regards

Shane Sody

**President**

Adelaide Park Lands Association.

[www.adelaide-parklands.asn.au](http://www.adelaide-parklands.asn.au)



**DIT:Minister Koutsantonis**

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**From:** Shane Sody <shane.sody@gmail.com>  
**Sent:** Friday, 22 July 2022 2:29 PM  
**To:** DIT:Minister Koutsantonis  
**Cc:** Adelaide EO; Ingrid Wangel  
**Subject:** Re: 22MIT1300 - Final

**Categories:** Printed

Dear Minister Koutsantonis

I refer to you office's email of 14 July in which it was stated that there was an election commitment to build a new Aquatic Centre in Park 2.

With respect, the election commitment was not specific to Park 2, but envisaged an "adjacent" site. "Adjacent" was not defined pre-election so it would be possible to fulfill this election commitment by choosing a brownfield site in an "adjacent" suburb.

The current consultation process is deeply flawed by not permitting the community to nominate any site other than within Park 2.

As I have already mentioned, the Adelaide Park Lands Association is conducting a rival consultation process which enables participants to choose any suburb or location. Our survey will continue until the end of the month but partial results have been published today in this article:

<https://www.adelaide-parklands.asn.au/blog/2022/7/22/aquatic-centre-consultation-farce>

I would hope that the State Government will not disregard the views of hundreds of constituents by continuing to insist only upon a site within Park 2. Many respondents have urged the Government to consider sites that would be more convenient in terms of accessibility, connections with public transport, parking and the opportunity to revitalise an inner suburb. Sites in Hindmarsh, Thebarton, Bowden and Brompton are being mentioned in these responses.

Many respondents are speaking up on behalf of the many trees that would need to be felled if the Government were to persist with its focus only on Park 2. I note that the Federal Environment Minister Tanya Plibersek spoke this week about the need to "Protect" and "Restore" Australia's environment. The Adelaide Park Lands Association has the same focus, namely to "Protect" and "Restore" the Park Lands. This is also an opportunity for you.

You can achieve an historic win-win, with both a new Aquatic Centre ,and at the same time a win for the world-unique, National Heritage-listed Adelaide Park Lands, by restoring the current Aquatic Centre site to Open Green Public. You would be applauded and congratulated widely for such a choice.

I am happy to provide the full text of all survey responses received so far if that would be of assistance. Many of the comments are insightful and would add value to Government contemplation of options.

I will provide the full responses in any case after our survey concludes on 31 July.

Kind regards

Shane Sody  
**President**

Adelaide Park Lands Association.

[www.adelaide-parklands.asn.au](http://www.adelaide-parklands.asn.au)



On Thu, 14 Jul 2022 at 09:02, DIT:Minister Koutsantonis <[Minister.Koutsantonis@sa.gov.au](mailto:Minister.Koutsantonis@sa.gov.au)> wrote:

**OFFICIAL**

Dear Mr Sody

Thank you for your email dated 13 June 2022, to the Minister for Infrastructure and Transport, the Hon Tom Koutsantonis MP and the Premier, the Hon Peter Malinauskas MP, about the Adelaide Aquatic Centre Development. As the matter you have raised falls within the Ministers portfolio responsibilities, the Premier has asked that this office responds on his behalf.

The Department for Infrastructure and Transport advises that it is currently undertaking a community consultation process for three locations within Park 2 as per the pre-election commitment, which concluded on 10 July 2022. The results of the community consultation process will now be considered by a community reference group, which will make recommendations to the government on the preferred location within Park 2.

We note your intent to provide results from your separate consultation process to the Minister.

Yours sincerely

Office of the Hon. Tom Koutsantonis MP  
Minister for Infrastructure and Transport  
Minister for Energy and Mining

T 71331100 • Level 17, 25 Grenfell Street, Adelaide SA 5001 • DX 171 • [www.dit.sa.gov.au](http://www.dit.sa.gov.au)



collaboration . honesty . excellence . enjoyment . respect

**From:** Shane Sody <[shane.sody@gmail.com](mailto:shane.sody@gmail.com)>  
**Sent:** Monday, 13 June 2022 5:11 PM  
**To:** DIT:Minister Koutsantonis <[Minister.Koutsantonis@sa.gov.au](mailto:Minister.Koutsantonis@sa.gov.au)>  
**Subject:** 22MIT1300 Consultation on the site of the proposed new Aquatic Centre

Dear Mr Koutsantonis

I am one of your constituents in West Torrens but I am writing to you today in my capacity as President of the Adelaide Park Lands Association.

I was disappointed to learn today that a process of public consultation, about to be undertaken by the Department of Transport and Infrastructure, in relation to the promised new Aquatic Centre, appears to have pre-judged the outcome for the Adelaide Park Lands.

Unfortunately, the department's consultation envisages no potential site other than on Open Green Public Park Lands.

There are [multiple other sites around Adelaide that could be used](#). The State Government has powers to acquire any land it needs. By [thinking outside the box](#), a new Aquatic Centre site could be a win-win for swimmers and the public's world-unique Open Green Public Adelaide Park Lands.

The proposed new Aquatic Centre is intended to be a regional facility. It is not necessary for it to be located in Park Lands, nor even in the area of the City of Adelaide. You have acknowledged it's important that "many different communities in and around Adelaide's CBD have their say".

The Adelaide Park Lands Association has set up a rival consultation process. Our very brief survey gives respondents a wide choice of near-city suburbs where a new Aquatic Centre might be located.

<https://www.surveymonkey.com/r/KGZ7FKT>

Our survey will be running throughout the same period of time as the Department's flawed consultation. We will be providing results of our survey to the State Government.

I hope that our survey results will inform any subsequent decision, and that the State Government will realise that it is not necessary to [repeat past mistakes](#) and once again attack Adelaide's Open Green Public Park Lands to deliver a first-class new Aquatic Centre.

Yours sincerely

Shane Sody

14 Chatswood Grove Underdale SA 5032

Phone 0414 959 125



**President**

Adelaide Park Lands Association.

[www.adelaide-parklands.asn.au](http://www.adelaide-parklands.asn.au)



**Lucy Hood MP**  
MEMBER FOR ADELAIDE



Tom Koutsantonis MP  
Minister for Infrastructure and Transport  
GPO Box 1533  
ADELAIDE SA 5001

Sent via: [Minister.Koutsantonis@sa.gov.au](mailto:Minister.Koutsantonis@sa.gov.au)

*Tom,*  
Dear Minister,

I write to provide the feedback I have received, as the Member for Adelaide, regarding the new Adelaide Aquatic Centre on Pardipardinyilla / Denise Norton Park (Park 2).

As you may be aware, I have been out and about in my community, listening to local residents and frequent users of the current site about the future of the new Adelaide Aquatic Centre. I have received feedback from many in my community through survey responses, direct correspondence, and my community catchup at the current Adelaide Aquatic Centre site.

The majority of the feedback received from local residents and users of the current Adelaide Aquatic Centre was about the facilities that should be available at the new site. Suggestions included: a deep-water pool for activities such as water polo, underwater hockey, and water aerobics, as well as sauna, spa and steam room facilities.

Other feedback focused on the location of the site, which I understand is the topic of the current phase of community consultation process by the Department of Infrastructure and Transport. Please see the spreadsheet attached detailing feedback received from individuals in my community for the Department's ongoing consultation for this project.

Many in my local community were overjoyed when they learned the Minister had decided to keep the current Adelaide Aquatic Centre open and running while construction begins on an alternative site on Pardipardinyilla / Denise Norton Park (Park 2). The community heavily relies on this State facility so I am pleased services at the current site will be available until the new Centre opens.

I appreciate all your efforts in establishing a new Adelaide Aquatic Centre on Pardipardinyilla / Denise Norton Park (Park 2) for South Australians, owned by South Australians.

Thank you for considering the feedback of my local community.

Yours sincerely,

*Lucy Hood*  
**Lucy Hood MP**  
Member for Adelaide

July 2022

8269 1838 | [adelaide@parliament.sa.gov.au](mailto:adelaide@parliament.sa.gov.au)  
84 Prospect Road, Prospect SA 5082



RELEASE IN PART

**DIT:Minister Koutsantonis**

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**From:** Anne Wharton [REDACTED]  
**Sent:** Wednesday, 6 July 2022 11:53 AM  
**To:** DIT:Minister Koutsantonis  
**Subject:** 22MIT1829 New Aquatic Centre

**Categories:** Printed

Dear Minister Koutsantonis

I wish to express my total opposition to building the new Aquatic Centre on Denise Norton Park, which would result in the bulldozing of dozens of trees. Our Park Lands are the jewel in the crown for Adelaide and should be preserved for the people of South Australia. Your Government's plans appear to breach a commitment given by SA Labor before the State election to improve SA's tree protection regime, which is recognised as the worst in Australia.

Before the Election Labor suggested that a new Aquatic Centre might be adjacent to the current site; leaving open the possibility of a brownfields site in Medindie, Fitzroy, Bowden, Brompton, Ovingham or Hindmarsh. The party's promise did not openly threaten Park Lands. Now the new Government are saying that there are no other options other than building the Centre in Denise Norton Park. Any one of the three options in this Park would require clearing dozens, if not hundreds of trees.

There are many suitable brownfields sites close to the CBD and public transport. Here is the Government's opportunity to honour their pre-election promises by selecting one of these sites.

Yours faithfully  
Anne Wharton

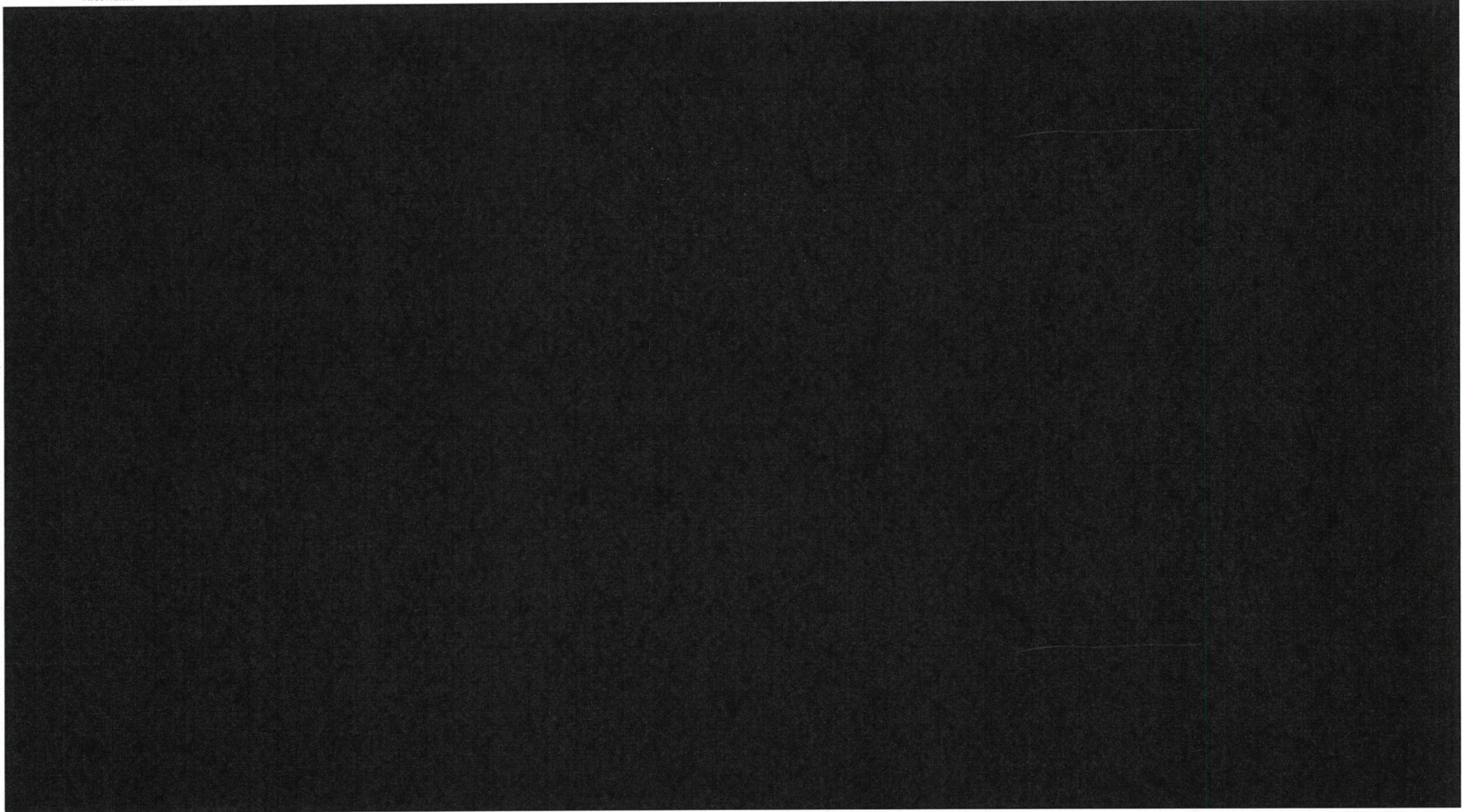
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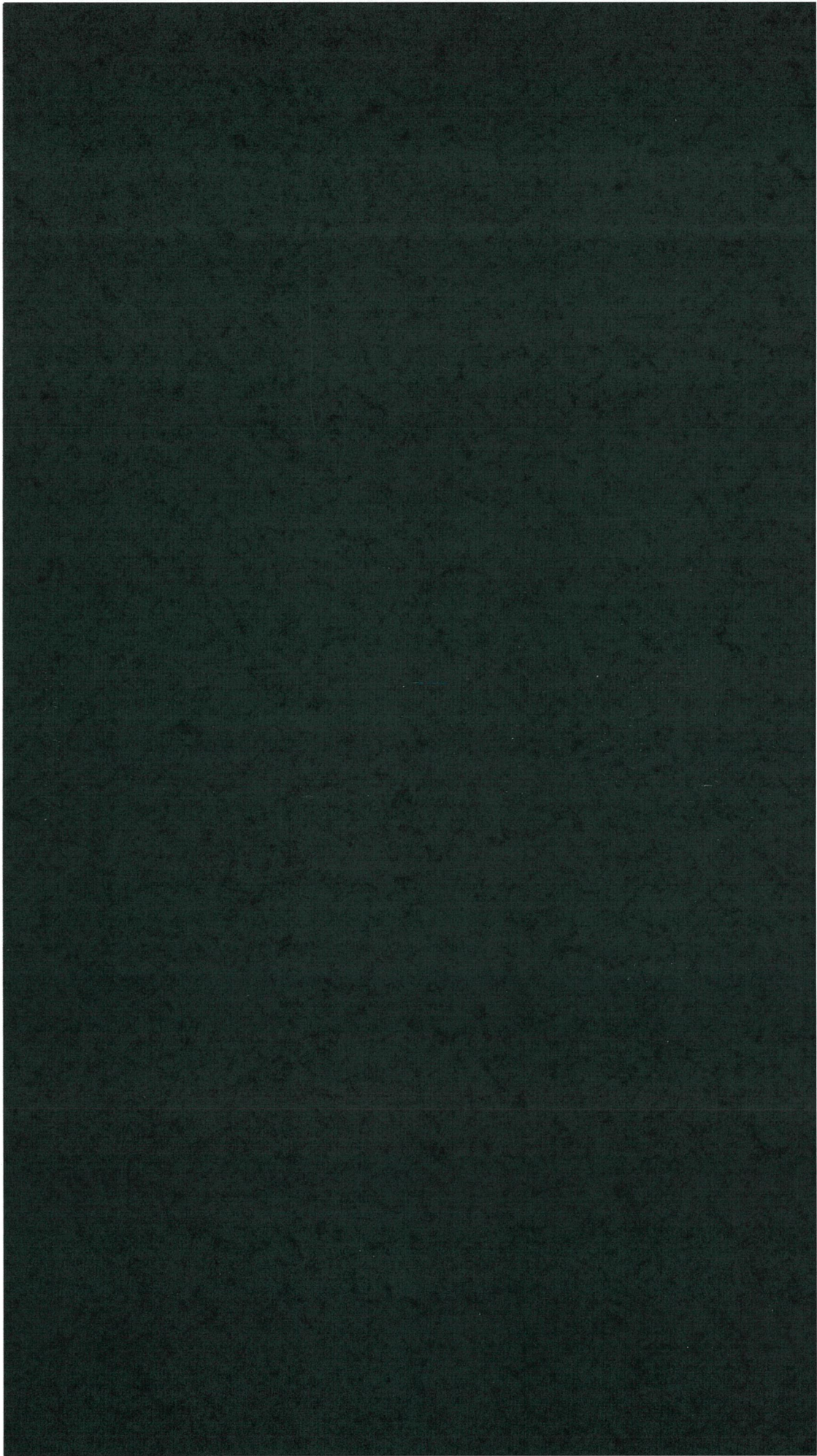
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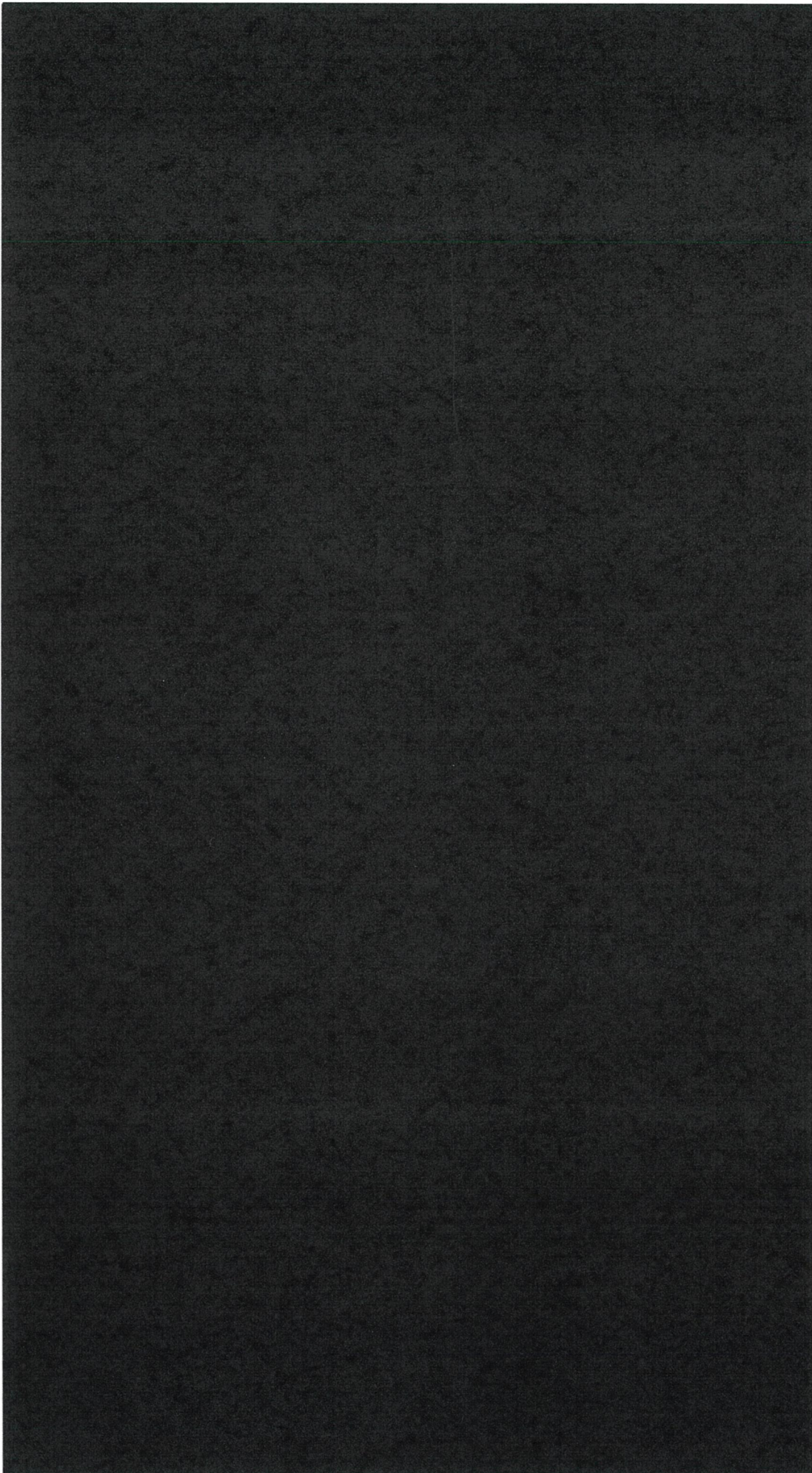
Email: [REDACTED]  
Phone: [REDACTED]

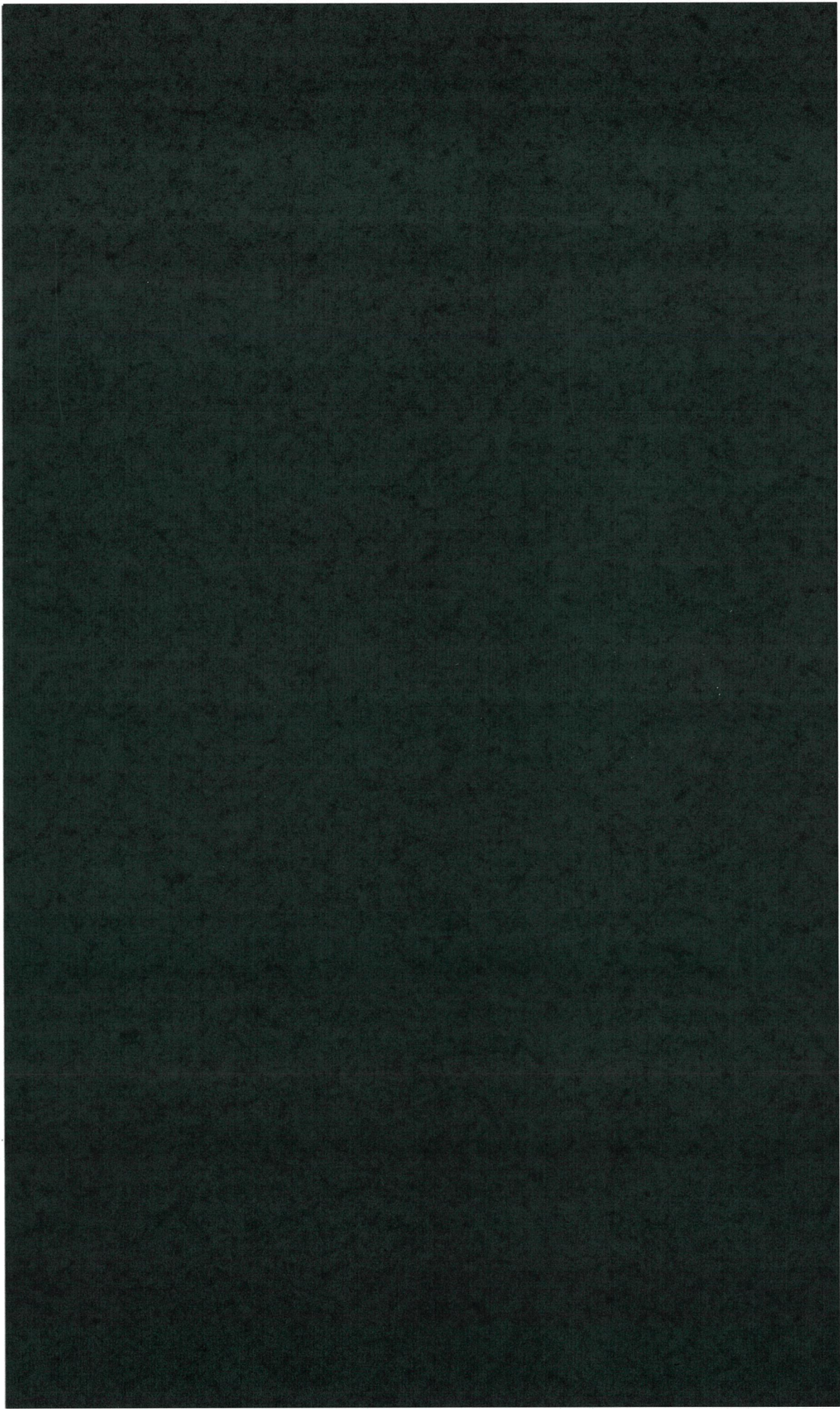
"A society grows great when old people plant trees whose shade they know they shall never sit in." (Greek Proverb)

First Name	Last name	Address 1	Address 2	Postcode	Phone number	Email	Attended SCM	Notes/Feedback
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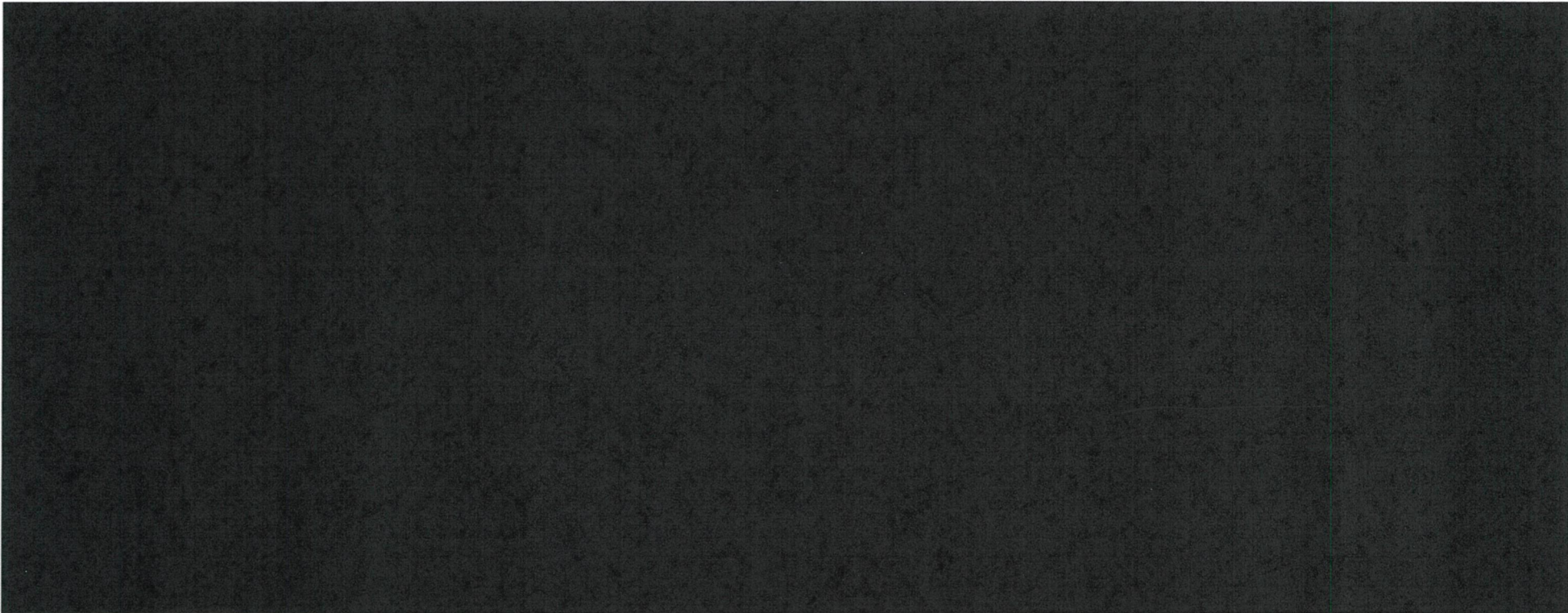


I understand that the SA Government has undertaken to replace the existing Adelaide Aquatic Centre (AAC) during its term of office – and a site for the new AAC has not yet been resolved. I undertook the on-line survey for this, but only 3 sites were proposed – all on Park 2. None of these sites were ideal – as 2 of them would result in the destruction of countless significant/ mature trees – and the 3rd will result in the loss of a large area of public playing fields (for the construction period at least). There was no guarantee of the replacement of these playing fields – temporarily or permanently. There was also no detail about the retention of trees around the 3rd site (at the corner of Barton Tce W & Jeffcott Rd). If re-building on the Parklands, this would turn much of Park 2 into a demolition/ construction site for a few years.

There was no option in the above survey to propose alternative sites – which I would now like to do. There is a long-vacant block of land in Prospect – on the corner of Churchill & Regency Rds. This is very similar in area to the existing AAC (including car park) – total ~ 37,00m<sup>2</sup> - & it's less than 3km from the existing AAC. It can be found via a search for 250 Churchill Rd Prospect (on Google Maps/ Earth). The vacant block was previously owned by Kaufland – who did some site preparation works on it before abandoning it & selling it (about a year ago). The new owners haven't built much on it – yet. The SA Gov't would have the authority to make a compulsory purchase of this land for a public facility.

I believe that the siting of the new AAC on the above block in NW Prospect would be popular with residents of the inner northern suburbs – who currently don't have facilities equivalent to those in the south (new Marion centre etc). It is within the SA electorate of Crordon.

Please consider siting the new AAC at the corner of Churchill & Regency Rds, Prospect. The Adelaide Parklands are unique and received National Heritage Listing in 2008 – and are meant to be retained for free public access to nature etc.



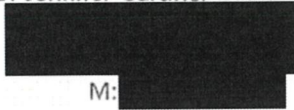
Anne Wharton

no

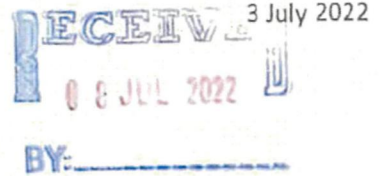
I wish to express my total opposition to building the new Aquatic Centre on Denise Norton Park, which would result in the bulldozing of dozens of trees. Our Park Lands are the jewel in the crown for Adelaide and should be preserved for the people of South Australia. Your Government's plans appear to breach a commitment given by SA Labor before the State election to improve SA's tree protection regime, which is recognised as the worst in Australia.

Before the Election Labor suggested that a new Aquatic Centre might be adjacent to the current site; leaving open the possibility of a brownfields site in Medindie, Fitzroy, Bowden, Brompton, Ovingham or Hindmarsh. The party's promise did not openly threaten Park Lands. Now the Government is saying that there are no other options other than building the Centre in Denise Norton Park. Any one of the three options in this Park would require clearing dozens, if not hundreds of trees.

Dr Jennifer Gardner OAM



M: [Redacted]



The Hon. Tom Koutsantonis  
Minister for Infrastructure and Transport  
Minister for Energy and Mining

Dear Mr Koutsantonis,

**New Aquatic Centre – alternative sites and restoration of current site**

I write to express my deep concern about the proposal to build the new Aquatic Centre in the Adelaide Park Lands (Denise Norton Park / Pardiprdinyilla - Park 2) and the resultant loss of scores and possibly hundreds of trees.

**I urge the Parliament to:**

1. Choose an alternative site outside the Park Lands for the new Aquatic Centre
2. Respect Light’s vision and restore the current site to green space.

**Adelaide Park Lands**

The Park Lands must be kept *green, open and public*.

- The unique Adelaide Park Lands have Australian Heritage Listing and are worthy of World Heritage Listing.
- The Park Lands contribute to Adelaide being a ‘liveable’ city providing green space for passive recreation so essential for health and social wellbeing.
- Park Lands trees purify our air and cool our city, ameliorating the CBD heat island in a warming climate.
- Destruction of trees for new buildings and hardstand is incompatible with Adelaide as a world-listed ‘National Park City’.
- Adelaide has the worst tree protection laws of any Australian capital city.
- The proposed destruction of trees appears to breach a commitment given by SA Labor before the State election to strengthen SA’s tree protection legislation.
- It would take 100 small trees to provide the same tree canopy extent of one large tree. It would take many decades before new plantings provided the same environmental benefits of mature trees - shading for park users, and food and habitat for wildlife.

**Alternative sites for the new Aquatic Centre**

- There are a number of brownfield sites in close proximity to the Park Lands.
- The Government should purchase such a site for the new Aquatic Centre.
- In a recent online survey conducted by the Adelaide Park Lands Association (APA) regarding the siting of the new Aquatic Centre:
  - Fewer than 6% of survey respondents, so far, want Park Lands to be sacrificed.
  - The majority of respondents supported the inner Northwest and West Adelaide (e.g. Prospect, Bowden, Brompton, Hindmarsh) as preferred areas for the new centre. These areas are currently undergoing urban renewal with high density accommodation and are close to public transport and the CBD. The old Brewery Site is another option.

**Restoration of current Aquatic Centre site**

- The Adelaide Park Lands Act 2005 (version 19.3.2021) regarding change in intended use of land, a report must be prepared and include information on the action that would be required in order to make the land suitable for public use as **park lands**.
- There is an opportunity to create a very special green space with more trees, wildlife habitat, artworks etc.

Sincerely,

Jennifer Gardner