NATIONAL TRUST
SOUTH AUSTRALIA

Port of Adelaide Branch of the National Trust SA

Submission

Submission in response to

Development Application by Newport Quays

for Precinct 2B of the Port Waterfront Redevelopment

Version B

Development Number 040/2673/07

21st November 2007 – most images not available in version B

Port of Adelaide Branch of the National Trust SA
PO Box 63, Port Adelaide BC, South Australia 5015

Introduction

The Port of Adelaide Branch of the National Trust wishes to make comment on the Development Application by Newport Quays regarding Precinct 2B of the Port Waterfront Redevelopment.

The basis for comment is to be found in the Objectives of the National Trust of South Australia Act 1955 –1975, section 5 [1]:

"The National Trust is established for the purposes of promoting –

(a) the preservation and maintenance for the benefit of the people of South Australia of lands and buildings of beauty or historic, scientific, artistic, or architectural interest and, as regards lands, the preservation [so far as practicable] of their natural aspect features and animal and plant life;

(b) the protection and augmentation of the amenities of such lands and buildings and their surroundings;

(c) the preservation of furniture and pictures and chattels of national, historic, artistic or scientific interest;

(d) the access to and enjoyment of such lands, buildings, and chattels by the public."

The National Trust of SA also believes that the adversarial relationship between development and conservation can be resolved by good management to form a complementary relationship.

The Port of Adelaide Branch advocates for the achievement of excellence in planning and urban design which recognises the area's unique heritage and character.

Further context for the Branch's comment on the Development Application is to be found in the Final Report for the Port Waterfront Redevelopment Site Remediation Works – the 197th Report of the Public Works Committee, 4th December 2003, specifically in section 3.1 under Project Justification:

The strategic assessment undertaken by Government in 1989 identified that higher level objectives may also be attained. This process resulted in five Paramount Objectives:

Environmental

- *Achieve industry best practice solutions that address the land's environmental condition;*
- *Adopt design and construction practices for infrastructure, buildings and services that promote excellence in environmental management.*

Integration and Economic Development

- *Redevelop the inner harbour of Port Adelaide consistent with regional development priorities;*
- *Stimulate economic development of the region and facilitate job creation.*

Financial

- *Effectively manage risk and provide an appropriate return to both parties.*

Community Lifestyle

- *Promote a high quality, diverse and vibrant living environment which engages and builds synergies with the surrounding community.*

Urban Design

- *Achieve excellence in planning and urban design which recognises Port Adelaide's maritime use, character and heritage;*
- *Enhance the identity, amenity and environmental quality of the inner harbour, and promote Integration of the project with the surrounding community.*

The Port of Adelaide Branch of the National Trust is pleased that rejuvenation and redevelopment of the Port Adelaide waterfront is taking place.

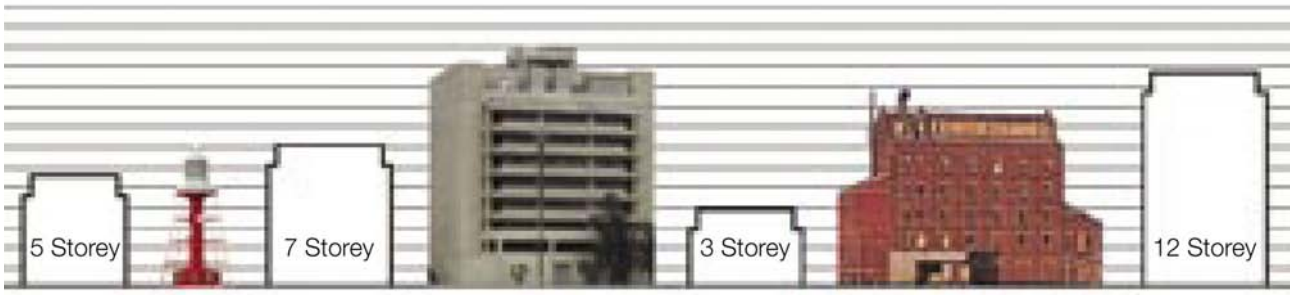
Our desire is to advocate for sensitive, site-specific urban waterfront planning and development that reflects the individuality of the Port Adelaide area and respects its maritime heritage.

We are open to innovative ideas and possibilities and see that there is rare opportunity to get this development right. The development should attain the highest possible standards which stand the test of time and are not seen later as a lost opportunity.

We welcome the potential for a shift in economic activity in and around the waterfront as a result of the Redevelopment as a whole, in the form of new tourism and business opportunities as well as jobs created by the construction works.

The Branch wishes to acknowledge the opportunity for comment on the application that has been provided by the Development Assessment Commission through its decision to declare Precinct 2B a 'Category 2' application. This opportunity is important for this Branch and for the community, given the community's experience of previous consultations organised by the Land Management Corporation about the Redevelopment as a whole.

As a result of feedback carried out from community consultations [carried out in 2001 and 2002] that consistently demonstrated that the community had major concerns about the scale, bulk and height of the proposed new redevelopment, the government's Land Management Corporation published and distributed throughout the community a document entitled 'Port Adelaide Redevelopment, Consultation Findings, April 2003' to allay those concerns. In it they produced an illustration comparing local structures, including one of Hart's Mill, to the silhouettes of 3, 5, 7 and 12 storey buildings.



Land Management Corporation's interpretation of 12 storey building height and bulk

The document further boldly stated that; 'The style of the new buildings proposed at Port Adelaide is similar to those in waterfront redevelopments around the world and not inconsistent with the current character of building heights already in the Port. In order to maintain views of the water and access to open space, the actual site area covered by buildings has been reduced as densities and heights increase.'

Hart's Mill when realistically compared to the 12 storey height and mass of the proposed Precinct 2B and with 7 storey buildings at Holdfast Shores, Glenelg

The PAR process that generated the existing Development Plan attracted 45 written submissions from local residents, local businesses, environment groups, heritage groups and local government, and 19 people elected to address the Development Assessment Panel. The submissions reflected the concerns of many that the redevelopment would result in a dramatic and unnecessary redefinition of the image of the community, an inexorable change to their sense of place, the 'privatising' of valued access to waterfront land and the destruction of most of Adelaide's and Port Adelaide's maritime, industrial and social history.

In the view of the Port of Adelaide Branch of the National Trust, the Newport Quays Development Application does not follow the general intent of the Port Adelaide Enfield [City] Development Plan and in many instances is inconsistent with its aims and does not achieve its objectives. The Branch therefore wishes to present its concerns to the Development Assessment Commission and requests that the Commission ensure that the following key elements of Policy Area 34B of the Development Plan be enforced:

1 The major link between Semaphore Road and the water.
2 A View and Activity Corridor from the Semaphore Road/Causeway Road intersection across the Port Adelaide River to the Hart's Mill complex
3 A useable and welcoming Public Plaza for community events
4. A substantial Public Jetty
5 Retention of the current water's edge
6 Compliance with height limits
7 A waterfront redevelopment that takes Port Adelaide and the Peninsula forward, but with a scale that integrates it with surrounding suburbs.

Submission Structure

This submission is organised under the following headings:

1 Master Plan
2 Heritage and Conservation
3 Sustainability and Environment
4 Built Form and Architecture
5 Amenity – Open space, Public Space and Active Interfaces
6 Permeability and View Corridors
7 Integration with Surrounding Communities
8 Tourism

Under each heading the relevant Development Plan Objectives, and Principles of Development Controls have been listed and our concerns have been detailed.

1 Master-Plan

[The following Objectives and Principles of Development Control, extracted from the Port Adelaide Enfield [City] Development Plan, best highlight our concerns regarding the Master-Plan.]

Port Adelaide Centre Zone

Principles of Development Control

12 Development which is proposed at the boundary of, or across, two or more policy areas should have regard to the objectives and principles of development control for each of the relevant policy areas to ensure effective interface management while achieving desirable outcomes for those policy areas.

The Development Plan highlights the importance of the interconnection between adjacent policy areas. We believe that it is vital that these same considerations be applied between adjacent Precincts within a policy area to ensure effective interface management and, more importantly, to manage the situation where changes

accepted by the Development Assessment Commission in one Precinct, will not adversely affect the ability of the next Precinct to meet the Principles and Objectives established for that Precinct. Precincts 2B and 2C should be amalgamated and treated as one. This area will be regarded as the most prominent area to be developed as it is the major visual and physical link between the historic Port Centre and the Semaphore Road hub through to the Peninsula. Therefore we advocate for the Development Application to combine Precinct 2B and Precinct 2C so that it can be fairly assessed against Port Adelaide Enfield Council's overall Policy Area 34B.

Waterfront Development

Principles of Development Control

68 Development should have regard to the desired scale, bulk and character of the streetscape and locality as expressed for the relevant policy area.

The Development Application appears to have no regard for the desired scale and character of the streetscape and locality as expressed in Policy Area 34B. The proposal's disregard the Development Plan's intentions for building height and mass, view corridors and public jetty and fail to meet many of the Objectives and Principles set down in the Development Plan.

71 Buildings should not exceed the number of storeys shown on the relevant Policy Area Concept Plan

The Development Plan for Policy Area 34B clearly shows a stepped 3, 5 and 7 storey height envelope with two 12 storey landmark towers forming a framing portal on either side of the Major View Corridor from the Semaphore Road/Causeway Road intersection. Within Precinct 2B, the Development Application shows a blanketing and widely spread podium of 2 to 4 storey car parks and townhouses with three 12 storey buildings proposed, where 7 storeys is clearly the Development Plan's height limit. If viewed with preliminary concepts for Precinct 2C where the two 12 storey landmark buildings are allowed for in the Development Plan, the five 12 storey buildings combine to create a massive and monolithic built form which is completely out of kilter with the desired outcomes of the Development Plan.

Policy Area 34B: Newport Quays Policy Area

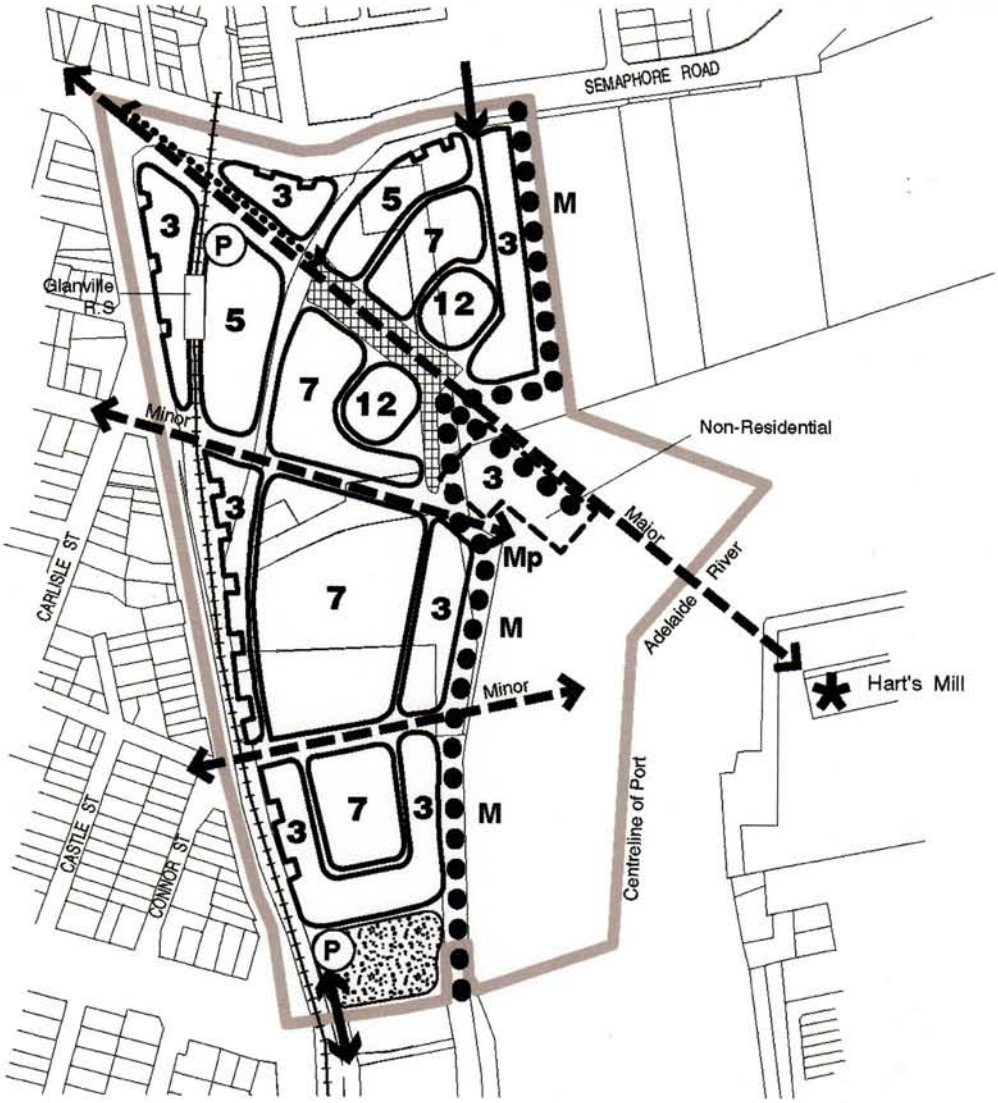
Objective 2: The creation of the active gateway to the Port River Waterfront from the west.

There appears to be no active gateway in the Development Application for Policy Area 34B. Access to the west is via convoluted railway pedestrian crossings and access towards Semaphore Road appears to end abruptly where the rail lines cross Semaphore Road. There should be a natural, unrestricted and welcoming transition when approaching from Semaphore Road into the Policy Area. Instead we appear to be offered a constrictive, claustrophobic and unwelcoming entrance into the Precincts. There should be both a view and activity corridor that links Semaphore Road with the water's edge and possibly continued across the River with the establishment of a water taxi route.

Principles of Development Control

1 Development should be consistent with the Desired Future Character Statement above and with Concept Plan Fig PAC/7.

Aspects of this Application are at major variance to the Desired Future Character Statement and Concept Plan in the Development Plan.



Articulated Facade
Mp Marina with public access
M Marina (private use)
Public Carparking
Public Reserve
Public Plaza
Public Promenade (Inner Harbour Ring Route)
Pedestrian/Cycle Link
Road Linkages
3 Maximum Building Height (Storeys)
Potential Over-water Development
Existing Landmark Building
View Corridor
Passenger Rail
Policy Area Boundary

PORT ADELAIDE ENFIELD (CITY)
NEWPORT QUAYS
POLICY AREA 34B
CONCEPT PLAN
Fig PAC/7
Consolidated - 11 October 2007

2 Heritage and Conservation

[The following Objectives and Principles of Development Control, extracted from the Port Adelaide Enfield Development Plan, best highlight our concerns regarding Heritage and Conservation.]

Council Wide

Objective 53: The retention, adaptation and enhancement of places of State Heritage value, Local Heritage value and areas or places of historic character, which contribute to the historic character of the zone or Policy Area.

Objective 54: The retention and enhancement of the historic character of the zone or Policy Area.

Objective 58: The preservation of buildings or sites of architectural, historical, scientific, environmental, landscape and cultural significance.

Our concern in relation to Objectives 53, 54 and 58 is that the Port of Adelaide's maritime heritage is at risk of losing essential physical elements of its history as a working port. The Port Waterfront Redevelopment site of 51 hectares of former working waterfront in the Inner Harbour plans to save only three heritage (listed) structures, and with the majority of evidence that the Port was once a working port already destroyed or earmarked for destruction, the remaining heritage values are at risk. The recent re-aligning of heritage precinct boundaries and ongoing neglect exacerbates the effects of the redevelopment.

The three heritage-listed items are Fletcher's Slip, the Adelaide Milling Company building and the adjacent Hart's Mill. There has been no statement from Newport Quays as to their plans for these items and no reassurance in regard to their preservation or incorporation into the redevelopment. The two mill buildings are in a state of considerable disrepair, are vulnerable to vandalism and squatters, and ultimately are at risk of complete loss by fire hazard.

The 51 hectares of the Redevelopment site is the equivalent to an area that stretches from North Terrace to Wakefield Street in one direction and from King William to Frome Street in the other.

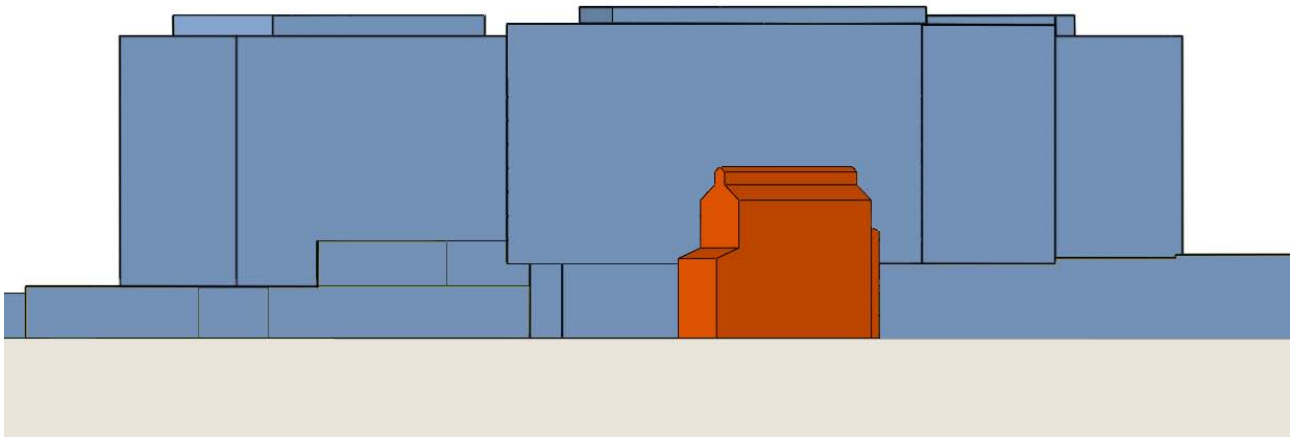
Despite the fact that one of the five 'Paramount Objectives' identified in a government report that gave the green light to the Port Waterfront Redevelopment (Public Works Committee, 2003) was to *"Achieve excellence in planning and urban design which recognises Port Adelaide's maritime use, character and heritage"*, all that is regarded as representing the Port's maritime use, character and heritage will be removed from the Inner Harbour.

We urge the DAC to recognise that the Port of Adelaide was one of South Australia's earliest settlements and historically the major entry point for immigrants and supplies due to the State's relative isolation with the first 100 years representing a period where almost everything that entered and left South Australia passed through the Port of Adelaide. The various stages of development as a working port through the mid to late 1800s up to the present day are reflected in buildings, boats and objects that have no formal protection under the existing State Heritage Area, including:

- **Searles boatyard and slips in an area that has built wooden boats since the 1840s**
- **The Double Hook Level Luffing Electric Wharf Cranes 1 and 2, that are the last remaining examples of their type in Australia**
- **The 'Nelcebee' that was for many years the oldest seagoing ship in Australia**
- **The 'Falie', the last remaining 'Mosquito Fleet' ketch in South Australian waters**
- **The 'Radio Shack' [formerly a manifest clearing office] – the only example of this type of building in Port Adelaide.**

These five items, grouped together under the banner of Port Adelaide's Maritime Heritage, were nominated for (and have just been included on) the Top Ten Heritage Most @ Risk List of the National Trust of Australia.

It is not lost on the Port of Adelaide Branch of the National Trust, nor the community as a whole, that Newport Quays is promoting the redevelopment on the back of the maritime port image and heritage that in fact will be systematically destroyed by the advance of the redevelopment.



The Hart's Mill complex is dwarfed by the mass of the proposed Redevelopment viewed from across Port Adelaide River

Port Adelaide Centre Zone

Objective 3: The maintenance of low impact port operations where consistent with the long term rationalisation of harbour activities revitalisation of adjacent waterfront land.

Existing and time-honoured boat-building and boat-repair businesses along Jenkins Street are facing closure to make way for further precinct development, with little likelihood that they will transfer to other premises [and rent structures] in the area, despite the inclusion in the redevelopment of marinas which will lead to a massive increase in the number of boats requiring maintenance and repair.

Objective 9: The further development of tourism, cultural and recreational facilities related to Port Adelaide's unique maritime and commercial heritage and character, and promotion of the zone as a major State tourism destination, by development supporting attractions including:
(a) the maritime museum
(b) the railway museum
(c) other museums and galleries
(d) hotel/motel facilities
(e) fish and growers markets
(f) convention and exhibition facilities
(g) boating and touring facilities, and interpretive facilities
(h) integrating development with the Port Adelaide River to take advantage of it as a major recreational resource.

It is our view that the tourist potential, let alone the general amenity, of Precinct 2B [and Policy Area 34B as a whole] would be enhanced by the application of Objective 9 to ensure the inclusion of 'tourism, cultural and recreational facilities related to Port Adelaide's unique maritime and commercial heritage and character'. Instead, the Application for Precinct 2B, viewed in the context of the Precincts developed thus far, shows a tendency towards a use of land and water space heavily weighted towards the privatisation of both.

Objective 10: The conservation and enhancement of items and areas of significance to the zone's unique maritime and commercial heritage, townscape**,** waterscape and landscape character.

Attention is referred to our comments above in relation to Objectives 53, 54 and 58. In addition, there is no evidence in the Application of any serious commitment to 'the conservation and enhancement of items and areas of significance to the zone's unique maritime and commercial heritage, townscape, waterscape and landscape character'. Evidence to the contrary is found in the failure to propose the use of traditional local

names within the Precinct, the cutting into the natural river bank to provide the 'water room', the proposed demolition of the Jenkins Street boatyards and the successful application by Newport Quays for the obliteration of the existing historical suburb names in common usage for 170 years.

Principles of Development Control

24 Existing buildings, places and areas of heritage value listed in Tables PAdE/2, 4 and 5 and shown on Fig PAC/2 should be conserved and their character and integrity should be protected and reinforced by compatible new development.

26 Development located adjacent to or facing zones, policy areas, places or items of recognised heritage value should be designed and sited to respect the architectural and design features of that zone/policy area/place/item.

Waterfront Development

Principles of Development Control

101 The design scale and form of new buildings should integrate with the design, form and scale of adjacent heritage buildings, using design elements reflecting maritime themes associated with a 'working port'.

With regard to Principles of Development controls 24, 26 and 101, within Policy Area 34C directly to the east of (adjacent to) Policy Area 34B sits the heritage listed Fletcher's Slip with its associated 2 storey ballast-basalt stone buildings. This is a place of recognised heritage value. The slipway was established in the early 1840s (the first in the Port) and was capable of handling 2000-ton triple masted ships. Directly across the river from Policy Area 34C sits Policy Area 34E which is made up predominantly of the heritage listed Hart's Mill and Adelaide Milling Company building complex. Policy Area 34E is a facing zone to area Policy Area 34C. The scale, mass and visual barrier of the proposed 12 storey buildings in Precinct 2B can in no way be seen as respecting this precious South Australian heritage. The buildings are overwhelming and 'bad mannered'.

'The palette of materials to be used along the podia will reflect and respect the historical maritime nature of the Port through a combination of timber, stone, steel and glass.' [Hassell letter to PAEC]

How?

3 Sustainability and Environment

[The following Objectives and Principles of Development Control, extracted from the Port Adelaide Enfield Development Plan, best highlight our concerns regarding Sustainability and Environment.]

Council Wide

Objective 55: To manage and conserve stormwater through the adoption of suitable water harvesting techniques to minimise run-off and to regulate the discharge of excess water into the drainage system.

With stormwater outlets discharging straight into the river at Precinct 1 and with the recent decision by DAC allowing the reduction of the rainwater harvesting requirements for the 7 storey buildings in Precinct 2A from 172,000 litres to 32,000 litres (at the developer's request), we would hope to see, in these extremely water sensitive times, a more proactive and enlightened attitude with regard to the harvesting, retention and use of rainwater. This development should not be satisfied with meeting the minimum requirements under law but should strive to be equal to the best in the world with regard to every aspect of water management.

Objective 56: To promote building design, siting and construction techniques which minimize energy consumption necessary for lighting, heating, cooling and ventilation.

The urban design of this precinct appears to contradict every established and recognised urban design principle, automatically precluding it from achieving anything near world's best practice let alone the minimum level required for apartment living. With large, monolithic buildings where the majority of the apartments face either east or west, and with apartment layouts that have windowless walls on three sides and are fully glazed on the fourth, the apartments will, without massive amounts of artificial cooling, be like ovens in summer. There is no possibility of cross ventilation in the walled in apartments, the reflected heat and light from the vast car park rooftops will double the radiation effects resulting in enormous energy consumption for the buildings. The 2 and 3 storey townhouses and SOHOs will suffer from overshadowing from the slab towers and the open spaces may not activate due to poorly planned solar access.

The broad expanse of the podium rooftops will reflect sunlight and radiate heat, especially into the lower level apartments in the 12 storey buildings.

Port Adelaide Centre Zone

Principles of Development Control

41 Development should be designed to minimise undesirable microclimatic and solar access effects on other land or buildings, including effects of patterns of wind, temperature, daylight, sunlight, glare and shadow.

Adding to our previous point, the height and bulk of the apartment towers will cause overshadowing of the waterfront and public spaces, reducing their amenity and create wind-tunnel effects between buildings.

43 Development should not result in noise emission which would detrimentally affect the amenity of adjacent properties. Where development is nearby to noise generating and or other potential adverse effects, amenity should be protected through appropriate design, orientation, building treatments and setbacks.

The effects with regard to the noise generation from 26 large powerboats entering and exiting the enclosed marina or 'water room' that is surrounded on three sides by 12 storey slab apartments which focus and reflect the noise, should be investigated.

Waterfront Development

Principles of Development Control

73 Building depth should enable dual access and views for apartments and promote natural ventilation where possible.

This Principle is not achieved in the 12 storey buildings.

129 Solar access to dwellings should be achieved by incorporating the following principles into the design of the building:
(a) face living areas to the north where possible;

The living areas of the proposed 12 storey buildings will mainly face east-west in direct contradiction to these Principles, requiring additional airconditioning to compensate for the heat generated by the western and eastern sun and the lack of flow-through of cooling southerly breezes in summer, and further, to compensate for the loss of warming northerly sun in winter.

131 Dwellings should provide adequate thermal comfort for occupants while minimising the need for mechanical heating and cooling, by:
(a) providing an internal day living area with a north facing window where possible;
(b) locating, sizing and shading windows to reduce summer heat loads and permit entry of winter sun; and
(c) allowing for cross ventilation to enable cooling breezes to reduce internal temperatures in summer.

Passive cooling by cross ventilation is not possible for apartments in Precinct 2B which appear to have only one window wall to access ventilation and there are large areas of east-west oriented glazing which contribute to increased internal temperatures in summer.

133 Where possible, development should be designed, sited and landscaped to facilitate the implementation of best practice water conservation; including to avoid or reduce water use, recycle water, and dispose of water appropriately.

Please refer to our comments regarding Objective 55 above.

Policy Area 34B: Newport Quays Policy Area

Principles of Development Control

12 Development with frontages to areas of the public domain including promenades, plazas and public reserves should be designed, sited and of a height to achieve a human scale and to maximise solar access to the public areas.

12 storey buildings will inevitably cast shadow across these areas of public domain through large parts of the day.

4 Built Form and Architecture

[The following Objectives and Principles of Development Control, extracted from the Port Adelaide Enfield Development Plan, best highlight our concerns regarding Built Form and Architecture.]

Waterfront Development

Principles of Development Control

61 Public Plazas should have a minimum of 1500 square metres other than where a public plaza abuts a promenade, where the area of the promenade should be inclusive in the calculation of the area (for the length that the promenade abuts the plaza)

The public plaza [square] on the western edge of the cut in marina, comes in at 600 sq m, including the promenade portion of the plaza. It is too small to be active and is sited at the shaded end of a wind tunnel.

70 Building height and separation should allow daylight access to all developments and the public domain.

Rather than allowing 'daylight access to all developments and the public domain', the Development Application shows buildings that have an orientation, height, scale, density and placement that totally ignores this development principle.

72 Buildings should be stepped and have variable heights, up to the maximum heights detailed in each Policy Area, provided that a variety in height is achieved.

Concept plan Fig PAC/7 shows that the general built form intended for Policy Area 34B is for stepped building heights of 3 storeys along the Causeway Road frontage rising to a central spine of 7 storeys and then reverting to 3 storeys along the waterfront. This is clearly intended to create a smoother transition from the single storey suburban character of Glanville and other adjoining suburbs, and to avoid high rise buildings along the waterfront. The predominant building height envisaged in the concept plan is for 7 storeys with two 'landmark' buildings framing a generous view from the corner of Semaphore Road and Causeway Road across to the Hart's Mill complex. If the Development Application adhered to the Development Plan then this would be achieved. Instead the Application provides 10 storey, wide slab buildings dropped on top of 2 storey horizontal slab car parks. These building heights in the Development Application are not stepped and are at major variance to the Development Plan.

86 Multi-level public car parks should be designed as buildings that contribute to the built form character of development within the Policy Area, take account of the desired character in adjacent Policy Areas, particularly the State Heritage Area and the Woolstores Historic (Conservation) Policy Areas, and should include active uses, such as retail, office and tourist activities, adjacent to street frontages wherever possible.

98 In Policy Areas 34B and 34D, buildings in excess of seven storeys in height should be designed as attractive, high quality 'landmark' buildings designed incorporating architectural elements characteristic of the Port Adelaide waterfront environment.

The 12 storey buildings cease to be 'landmark' or 'iconic' buildings as they increase in number from none to three buildings in Precinct 2B which will be all of uniform size, bulk and visual style. Their proximity to the two more 12 storey buildings proposed in Precinct 2C makes them even less like landmark buildings. Our concern is that when it comes time for the Developer to put in an application for Precinct 2C, they will argue that to make the two new buildings 'landmark' [in relation to the three 12 storey in the neighbouring previously approved Precinct], the height should be increased commensurately by 5 storeys to 17 storeys.

We also wish to question how the proposed 12 storey buildings incorporate elements characteristic of the Port Adelaide waterfront environment.

99 Development should incorporate a high degree of architectural quality with building design adequately addressing:
(a) compatibility in terms of form and scale with existing buildings and the Desired Future Character Statements of each Policy Area;
(b) interest and diversity;
(c) public domain interface;
(d) a high quality streetscapes;
(e) building height;
(f) massing and proportion;
(g) façade articulation; and
(h) elements such as eaves, sun shading devices, entries and balconies.

How do you make a cluster of 12 storey buildings 'compatible in terms of form and scale' with the neighbouring single storey cottages? The visual impact and barrier nature of these buildings causes a massive collision with the neighbourhood. They are incongruous, threatening to some and totally at odds with building synergies with the surrounding communities. If the developers followed the Development Plan with its transition from single storey on one side of Causeway Road through to the 3 storey precinct boundary up to the 7 storey spine, then the built form could be seen as compatible.

The large area and impermeable mass of built form created by the 2 to 4 level podium car parks prevents and interrupts interface with the public domain.

104 Facades should define and enhance the public domain and desired street character. The design of facades should integrate the building elements and overall form.

On the edge of Karka Cove to the south of the Precinct is a 3 storey car park building wall for almost the entire depth of the Precinct. On the northern side of the cut-in marina , the side of one of the 3 storey townhouses faces into the public domain. There is no active interface between the public domain and the built form other than the retail strip.

121 Windows and balconies within a residential flat building should be designed to prevent overlooking of more than 50 percent of the usable private open space of a lower level dwelling within the building.

The concave curved nature of Building E means that residents will be able to see more than 50 percent of not only their near neighbours' balconies on the same level, but also more than 50 percent of the balconies below these. The 12 storey towers also look down into the front courtyards of the 3 storey townhouses.

140 Development with frontages to areas of the public domain including promenades, plazas and public reserves should be designed and of a height to achieve a human scale and to maximize solar access to the public areas.

Solar access will be adversely affected by 12 storey buildings.

142 Larger landmark buildings should be broken into smaller vertical sections by appropriate façade treatment and distribution of mass, setbacks and ground level articulation/uses.

How is this being achieved with the proposed 12 storey buildings?

Policy Area 34B: Newport Quays Policy Area

Principles of Development Control

14 The ground level of all over-water development should be used for non-residential purposes including retail, tourism and commercial uses.

How is this being achieved with Building E? The plans show the ground floors to be residential.

17 Residential development should include design features to limit the effects of noise from land and water based traffic and activities, where the effects from these activities are considered to exceed acceptable levels.

What measures are been taken to counteract the effects of unwelcome noise from 26 power boats berthed within the confines of the sound shell created by high rise surrounding the cut-in marina?

24 Landmark buildings not exceeding 12 storeys in height may be appropriate adjacent the public plaza with sufficient setbacks on either side of the public plaza to ensure the human scale, amenity and reasonable solar access within the plaza is protected.

The three 12 storey buildings in Precinct 2B all encroach into the boundaries of the public domain, each with setbacks in one axis but not in the other. Solar access has been previously discussed.

'The architecture proposed combines distinctive tower forms that float over articulated and sensitively modelled low rise podium forms.' [Hassell letter to PAEC]

Translated: Three monolithic, slab-like physical barriers between the community and the river are heavily sited on top of non-permeable slabs of 2 to 3 storey car parks/townhouses with a massive footprint...

5 Amenity – Open Space, Public Space and Active Interfaces

[The following Objectives and Principles of Development Control, extracted from the Port Adelaide Enfield Development Plan, best highlight our concerns regarding Amenity – Open Space, Public Space and Active Interfaces.]

Council Wide

Public Open Space

The quality and useability of open space is an important planning consideration and there is an increasing recognition of the need to provide a range of recreational opportunities or settings to cater for a variety of community needs. The design of open space should therefore, reflect demand by offering a balance and variety of opportunities and experiences.

The Application is not consistent with this Objective as it shows no open space that is useable for purposes other than sitting, or walking or cycling along paths. There is no space that will enable outdoor events of any kind. The limited open space provided does not offer 'a balance and variety of opportunities and experiences' and appears designed more for passive use by, or for the visual enjoyment of, the development residents. It is not designed in a way that encourages use by the surrounding community, thus contributing to the long-held concern of community members that the redevelopment is intended as an 'exclusive enclave' for its residents. There is no evidence that the open space meets the requirement to 'cater for a variety of community needs'. The 'water room' is essentially 'water-based real estate' as it privatises and commercialises space that should be used for community benefit.

Port Adelaide Centre Zone

Principles of Development Control

5 Appropriate recreational and tourism development, such as marinas, maritime museum uses and ferry services, may be developed on Port Adelaide River in locations where boating and harbour activities can be undertaken safely and conveniently

There is no evidence that opportunities for 'recreational and tourism development' have been considered in this application.

Existing and time-honoured boat-building and boat-repair businesses along Jenkins Street are facing closure to make way for further precinct development, with little likelihood that they will transfer to other premises [and rent structures] in the area, despite the inclusion in the redevelopment of marinas which will lead to a massive increase in the number of boats requiring maintenance and repair.

These boatyards also offer the rare opportunity for a tourism focal point, given that there is great appeal to the general public in viewing and even being involved in the process of boatbuilding. Other institutions in Australia and overseas have capitalised on these ventures and they are internationally recognised assets with an economic benefit as well as a tourism benefit.

Waterfront Development

Principles of Development Control

141 Buildings constructed adjacent to the Public Promenade, Public Plazas, Public Reserves, main roads and edges of public spaces should be designed to:
(a) maintain an 'active' interface through architectural detail and interest in skyline and pedestrian levels,
(b) maintain the continuity of streetscape with streets and public spaces defined by consistent building frontages at the street alignment,
(c) maximise solar access and limit overshadowing of these areas,
(d) protect the amenity of residents at ground level,
(e) protect pedestrian amenity
(f) not result in visual domination, and
(g) provide for varied and attractive building elevations.

Instead of active interfaces at ground level, there are a significant number of 'dead' walls adjacent to public pathways and roads to the north and south of the Precinct. The number of 12 storey buildings which are the same height, size and visual form creates an unvaried building elevation.

The height of the buildings will cause overshadowing and visual domination of public spaces. A 12 storey building in Precinct 2B and 7 storey buildings proposed for Precinct 2C are sited on the waterfront and create a visual and physical barrier to the water.

143 Larger landmark buildings should be at an appropriate scale at ground level to create a pleasant, comfortable and well-proportioned pedestrian environment at a human scale.

A 12 storey building built close to pedestrian environments is mutually-exclusive of the notion of human scale.

Policy Area 34B: Newport Quays Policy Area

Objective 4: The provision of public recreation areas, including a publicly accessible waterfront promenade, for uses such as walking and cycling.

The Development Plan requires the waterfront promenade to be a minimum of 8 m wide. The Application proposes only the minimum width. 8 m is a narrow space when bordered by private dwellings and forces pedestrians and cyclists to 'pass through' only, not to linger and make use of public space for rest and recreation activities. However the Objective would seem to be aimed at ensuring the provision of a more generously-proportioned pathway that provides special spaces for particular and varied purposes and which encourages congregation as well as destination connection.

Principles of Development Control

3 Development should create a vibrant environment through the incorporation of a public plaza and an active street level frontage.

With most of the promenade being the minimum 8 m wide and set between private marinas and the fronts of privately owned dwellings and with any retail area occupying the ground level of future wind tunnels, how is it envisaged that the public domain will provide a 'vibrant and active' environment? Most of the interface between the public domain and the buildings will be non-active fronts of dwellings.

A public plaza proposed in the Development Plan for Precinct 2C was intended to connect with a major jetty structure in Precinct 2B that allowed for an active ground level interface. If the cut-in marina ('water room')

is allowed then this eliminates the possibility of achieving the major jetty structure which was to form an extension of the Major View Corridor that coincides with the entrance to the proposed cut-in marina. This will significantly diminish the public realm and the intention to have a generous public plaza connecting with the jetty.

If the intention is to further privatise these spaces and to create an enclaved environment, then the Development Application goes a long way to achieving that goal.

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5 Local convenience shopping, hairdresser, snack bar, pharmacy, cafes and restaurants and other mixed commercial activities, are appropriate within the public plaza and over water development site.

7 The development of an over water landing for public recreational purposes is considered appropriate.

8 An over water landing should form a continuation of a public plaza, as indicated on Concept Plan Fig PAC/7.

9 The proposed jetty/landing should be publicly accessible for its entire length.

10 Any over-water development adjacent to the pier should be sited so that it does not interrupt the full view corridor created from Semaphore Road/Causeway Road intersection along the public plaza through to the Hart's Mill complex.

What 'over water development' site? The substantial public jetty which was the 'over water development site' in the Development Plan is to be replaced in the Precinct 2B Development Application with small pontoons described laughably as 'public jetties'. The placement of the cut-in marina in Precinct 2B precludes any possibility of including a substantial public jetty. The desire in the next stage to have a second cut-in marina [although this marina does follow the current river's edge profile] also puts a halt to the idea of a public jetty, again reinforcing the notion of an enclave.

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18 A continuous public promenade for pedestrians and cyclists should be created along the waterfront, where possible, with convenient, safe and attractive links to adjoining areas and should:
(d) locate the pedestrian zone adjacent the waterfront and provide a variety of waterfront experiences

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See comment in relation to Objective 4 [page 15]. The proposed promenade meets only the bare minimum requirement of space and will therefore not provide 'a variety of waterfront experiences'.

There are few access points into Precinct 2B from Causeway Road and Semaphore Road for pedestrians or cyclists, thus 'closing off' the redevelopment from the local community.

For the number of residents of the development, there is very little open space for recreational activities other than boating.

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6 Permeability and View Corridors

[The following Objectives and Principles of Development Control, extracted from the Port Adelaide Enfield [City] Development Plan, best highlight our concerns regarding Permeability and View Corridors]

Waterfront Development

Principles of Development Control

48 Development should create and enhance continuous public pedestrian and cyclist access with a minimum width of 8 metres along the waterfront providing convenient, safe and attractive linkages between policy with and wider sections in areas of high pedestrian or cycle traffic and in front of key tourism uses.

56 Public plazas and public reserves should be provided adjacent to the pedestrian promenade to provide for larger outdoor public events and gathering spaces adjacent to the waterfront in accordance with concept plans for Policy Areas 27, 28, 34A, 34B, 34C, 34D 34E, 35 and 36.

There is no provision of public plazas or reserves big enough to 'provide for larger outdoor public events and gathering spaces', and in fact the Application seems planned to exclude these possibilities.

The 'water room' – a private marina for those privileged to own boats – reduces the amount of land that could have been used for more generalised and varied public activities. Simply eliminating the 'water room' and making this area into a public plaza would allow the broader community to connect with the development, providing a place for outdoor events and markets. It would also allow the inclusion of a substantial public jetty as proposed in the Development Plan.

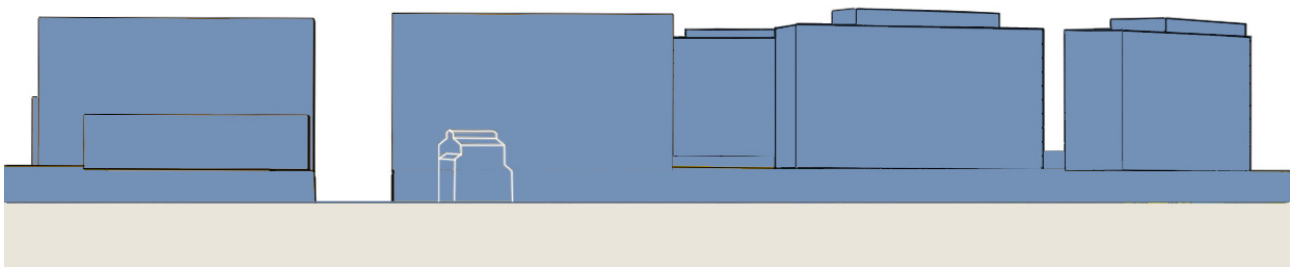
75 Development should be sited to provide view lines and reinforce existing vistas through Policy Areas to the Port River and to landmark buildings, as indicated on the relevant Policy Area Concept Plans. These view corridors could take the form of public road reservations, public reserves, and/or wider spaces between buildings and should generally incorporate pedestrian linkages. Major view corridors should be a minimum of 17.5 metres wide and minor view corridors should be a minimum of 12 metres wide.

There are two view corridors associated with Precinct 2B, the Minor View Corridor that in the Development Plan extends from the Cumberland Hotel across to the Hart's Mill complex, and the Major View Corridor that originates at the Semaphore Road/Causeway Road intersection with the intension of expanding out to a generous view of Hart's Mill.

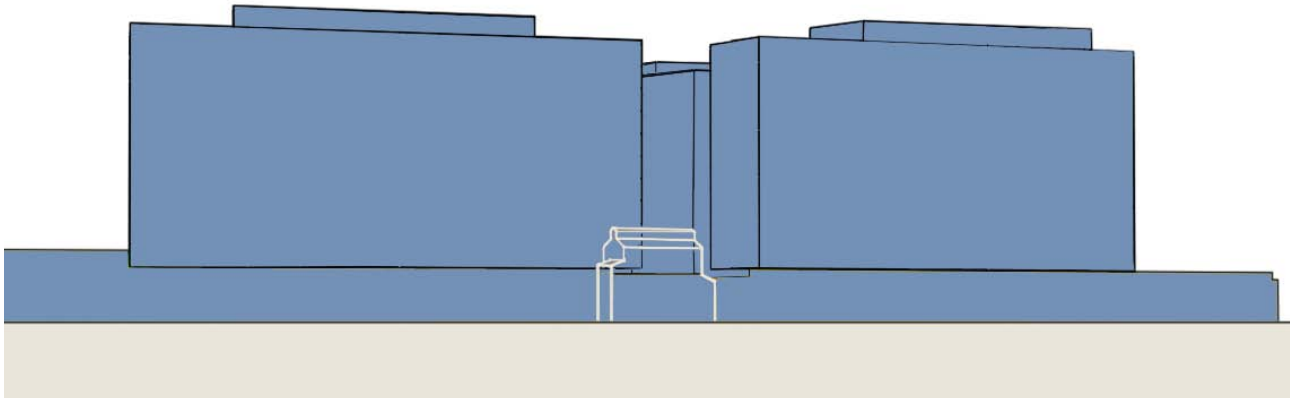
In the Development Application, the Minor View Corridor has been relocated to run perpendicular to Causeway Road from a car park. This eliminates the ability of traffic on Causeway Road to view the Mill complex as they would have been able to when travelling south. The only viewing opportunity seems to be for people walking from the car park into the development looking directly east.

The Major View Corridor alignment does not take advantage of traffic travelling east queuing at the Semaphore Road intersection. The corridor aligns with a point about 30 m east of the intersection, corresponding to where local trains cross Semaphore Road. This corridor is tightened by the configuration of intended multi-storey buildings to the extent that it has turned into a view 'slot'. Instead the view through the 'slot' will be of the TAFE College. Both view corridors will also form wind tunnels so that amenity for the intended retail premises will be compromised by strong northerly and westerly winds.

The overshadowing created by the 12 storey buildings that extends all the way out to the public space is also of concern.



Major View Corridor from Semaphore Road intersection. Hart's Mill complex is hidden behind a wall of 12 storey buildings



The view of Hart's Mill complex along the line of the original Minor View Corridor in the Development Plan is obstructed by the proposed 12 storey buildings. This will be the view from the Cumberland Hotel on Causeway Road.

Policy Area 34B: Newport Quays Policy Area

Objective 5: Landmark buildings up to 12 storeys high designed to capitalise on their location, terminating vistas from Torrens Road, and act as portals to frame views into and out of the inner harbour. The architectural quality of landmark buildings should recognise their prominent role in the urban identity of this area and the north western metropolitan area more generally.

Concept plan Fig PAC/7 in the Development Plan makes the meaning of Objective 5, with its reference to portals, clear. The view to Hart's Mill from Semaphore Road is preserved through a view corridor. The concept plan allows a very restricted area which is 12 storeys in height by using a pair of 12 storey towers to create a portal that frames the view of Hart's Mill through the view corridor as a means of accentuating that view.

This is the portal referred to in Objective 5 and elucidated in Fig PAC/7. The intention of the concept plan is to have a pair of 12 storey buildings which are of a relatively small footprint and are considerably higher than their width and depth. These are intended to act as doorframes, while the space between them was to be the doorway. It is in this sense that they are referred to as being a 'portal'. The plan proposed by the Application is a complete abnegation of the 'portal' idea contained in concept plan Fig PAC/7 and Objective 5. The relatively small footprint of the two 12 storey buildings has more than tripled in size. The two 12 storey buildings are no longer like a portal, in this case intended to frame the vista of Hart's Mill, but have widened into a series of 12 storey 'walls'.

The departure from the planning rules for the area is even more marked, in that a total of five 12 storey buildings is now envisaged [three in Precinct 2B and two in Precinct 2C], and the 7 storey spine proposed in Fig PAC/7 has been replaced by a 12 storey spine.

7 Integration with Surrounding Communities

[The following Objectives and Principles of Development Control, extracted from the Port Adelaide Enfield Development Plan, best highlight our concerns regarding the Integration with the Surrounding Communities]

Port Adelaide Centre Zone

Principles of Development Control

36 Development should have regard to the height of adjoining buildings and townscapes within its locality and generally not exceed the height limits stated for each policy area in the zone.

The Port Waterfront Redevelopment project is the latest [and possibly last] waterfront redevelopment in Australia and like most of its predecessors in other states, such as Fremantle and Docklands, is sited in a working class area that has a strong sense of its own identity and traditions and definition of 'community'. For good reason, then, the PAE Development Plan places emphasis on the importance of attempts to integrate the Port Waterfront Redevelopment with the local community to minimise the potential for an 'us-them' attitude between the often high-income, non-local residents of waterfront apartments and the long-standing low-to-middle income community residents. The Branch, with its large grassroots membership and general community connection, is concerned that antagonism is already building and hopes that the Development Assessment Commission will take a broad as well as a specific approach to assessing the compliance of the Development Application to the Development Plan, paying attention to the spirit of the Plan as well as to the detail of its provisions.

This antagonism has been fuelled in part by the negative characterisation of the Port area as degraded, derelict and decaying. While the Port has undoubtedly suffered, as have other port areas, from decline in commercial and shipping industries, it has developed a more recent economy in tourism, artistic endeavour, gradual 'gentrification' of residential areas and the development of small businesses, and so local people resent the inference that the Port is to be 'saved' only by the injection of a 'new breed' of resident into 'up-market' apartments. It ought to be possible to better integrate the redevelopment with the existing social, residential and business fabric of the Port area.

The Branch has heard the concern of many in the community that the redevelopment, as advertised by Newport Quays, is intended to attract only a narrow band of new residents – high-income singles and couples, instead of enhancing the social mix of people of the local community. The redevelopment will result in a rise in property values across the Lefevre Peninsula which will threaten the Port's traditional inter-generational commitment to living in the area and acts against the State Government's commitment to the provision of affordable housing and high-needs housing across the metropolitan area. The Development Assessment Commission is urged to ensure adherence to the intention of the Development Plan that the redevelopment not foster a sense of gated-community fortification, antagonism and insularity between existing and new residents. Much of the potential for the success of the redevelopment lies in ensuring that the existing community feels welcome to come into the redevelopment and that the new residents feel a sense of welcome and integration into the activities of the surrounding community.

The height, mass and scale of the built form is unsympathetic to and does not have regard for the surrounding suburbs. Given that the surrounding suburbs comprise mainly single-storey working to middle-class residences, it is difficult to argue that 12 storey buildings [particularly three of them in Precinct 2B and possibly two more in Precinct 2C] 'have regard to the height of adjoining buildings and townscapes' except with reference to previous Newport Quays Precincts 1 and 2A.

8 Tourism

[The following Objectives and Principles of Development Control, extracted from the Port Adelaide Enfield Development Plan, best highlight our concerns regarding Tourism.]

Port Adelaide Centre Zone

Principles of Development Control

6 Development providing facilities and attractions for tourists should be situated in defined and readily accessible nodes, particularly adjacent to, and on, the Port Adelaide River and associated public promenade, within the Port Adelaide State Heritage Area Policy Area, Port Centre Mainstreets Historic (Conservation), East End, McLarens Wharf, Dock One, Fletcher's Haven, North Bank, Newport Quays, Port Approach Policy Area and Hart's Mill Policy Areas.

52 Parts of the waterfront adjacent to the public promenade shown in Fig PAC/1 are to be made available for active public use for tourist related and harbour activities, including the use of small river craft and tourist boats.

The proven economic benefit from cultural and maritime tourism nationally and internationally that underpins the rationale for this Principle provides sufficient cause for the firm application by the DAC of the Principle to the Port Waterfront Redevelopment, in Precinct 2B and all subsequent Precincts.

There appears to be no provision in the Application for Precinct 2B for facilities or activities for tourists. Even the 'water room' [or private marina] does not provide for berthing by tourists or members of the surrounding community. The Concept plan indicates a Public Marina be sited near to the southern boundary of Precinct 2C and yet no infrastructure is apparent in the Development Application. As 'facilities or activities for tourists' are not provided in Edgewater or Marina Cove either, the trend of the redevelopment, thus far, would appear to be non-compliant with Principles 6 and 52.

Policy Area 34B: Newport Quays Policy Area

Objective 3: Development of medium to high density residential and small scale mixed use activities including some small scale tourist accommodation contributing to the vitality of the area.

Is there any small scale tourist accommodation associated with this Precinct?

Principles of Development Control

14 The ground level of all over-water development should be used for non-residential purposes including retail, tourism and commercial uses.

How will tourism be accommodated in the 12 storey over water building?

In Conclusion

The Port of Adelaide Branch of the National Trust of South Australia requests that the Development Assessment Commission ensure that the following key elements of Policy Area 34B of the Development Plan be enforced.

1 The major link between Semaphore Road and the water.

2 A View and Activity Corridor from the Semaphore Road/Causeway Road intersection across the Port Adelaide River to the Hart's Mill complex

3 A useable and welcoming Public Plaza for community events

4 A substantial Public Jetty

5 Retention of the current water's edge

6 Compliance with height limits

7 A waterfront redevelopment that takes Port Adelaide and the Peninsula forward, but with a scale that integrates it with surrounding suburbs.

Tony Kearney

Chairperson

Port of Adelaide Branch

National Trust of South Australia

Ian Stephenson

Chief Executive Officer

National Trust of South Australia