

Thank you for the opportunity to respond to the Newport Quays Development Application for Precinct 2B of the Port Waterfront Redevelopment, and for designating this application as category 2. However, I think it unfortunate that Newport Quays should have created the necessity for this response by seeking radical alterations to the terms of the existing Port Waterfront Redevelopment PAR. Along with many other community members and organizations, I devoted considerable time and effort to making a submission to the original PAR. It is always an unequal playing field for ordinary community members trying to respond to the proposals of highly-resourced and highly-motivated developers on projects of this sort, and the problem is exacerbated if the developers then seek to renegotiate the original development plan on a piecemeal basis.

This general problem is compounded in this case because Newport Quays have elected to break up Policy Area 34B of the Development Plan into what they now call Precincts 2B and 2C. I will comment on some substantive implications of this below, but in terms of process this approach makes it more difficult for ordinary community members to comment on the relationship between their new proposals and the original PAR, because it is not a case of comparing like with like.

My substantive comments follow below, along with brief indications of major principles in the Port Adelaide Enfield development plan which I think are particularly relevant to these comments.

Unjustified segmentation of established planning policy area

The development plan emphasizes that developments ‘proposed at the boundary of or across’ policy areas should have regard to the principle of ‘effective interface management while achieving desirable outcomes for those policy areas’. I believe that this principle is seriously compromised by Newport Quays attempt to break up their part of Policy Area 34 B into ‘Precinct 2B’ and ‘Precinct 2C’, and to offer firm proposals only for Precinct 2B at this stage. Area 34 B as a whole is a crucial region not just for the waterfront redevelopment but for the intersection between this and what might be called the ‘greater Semaphore’ region. It takes in the area of Glanville train station and transport hub, the intersection of Semaphore and Causeway Road, the top of a Semaphore shopping strip leading right down to the sea, and the proposed ‘view corridor’ from Semaphore road through to an important bend in the Port River and across to Harts Mill.

Positive, ‘organic’ relationships between the various components of this interface are vital for the future vibrant development of the Port-Semaphore region as a whole. In particular, the waterfront redevelopment around this critical intersection should provide an exceptional opportunity for the development of Glanville station as a truly dynamic transport hub - servicing both Newport Quays residents and residents from the adjacent established suburbs. (The role of Subiaco station, at a major node on the Perth-Fremantle line, provides a good example of what could be achieved in this respect).

Obviously, many of the variables relevant to such an outcome are outside the control of Newport Quays. It would depend very much on state government policy, not just on

Glanville station alone but on issues like the future electrification of the Outer Harbor rail line. However, it would seem reasonable to expect a positive, pro-active approach from Newport Quays on this issue; and indeed consortium spokespersons have been happy to argue, in public presentations, that exceptionally high densities were appropriate in their development around Glanville station precisely because of proximity to major public transport hub.

Despite these verbal gestures towards the importance of synergies between their development and the public transport hub, the consortium is in practice setting up major barriers to rational discussion of the overall 'interface' problems in the 34B area, by declining even to treat their own development zone in this policy area as an integrated whole. Moreover, the pervasive role - in their new 'Precinct 2B' proposal - of multi-storey structures for residents' parking strongly suggests that they are paying lip-service to the idea of positive synergies with the public transport hub, rather than given it serious consideration in their actual planning.

Monolithic built form and privatization of 'water views'

The Development Plan contains important principles for ensuring that the height, mass and distribution of new buildings in the 34B area should not be such as to introduce a monolithic and completely alien element into the built form of the broader region. It provides for multiple gradations in building height, with buildings mainly in the 3, 5, and 7 storey range, and gives approval for only *two* 12 storey towers – specifically designated as 'landmark' buildings framing the major view corridor from the Semaphore Road/Causeway Road intersection through to the water opposite Harts Mill. The revised Newport Quays proposal shows *three* major tower blocks in their Precinct 2B area alone. (A further *two* are indicated in their 'mud map' of Precinct 2C, which now incorporates the major view corridor).

One of the proposed Precinct 2B towers (Building E) would be partly over-water, and also over a section of the public promenade, which represents an undesirable compromise of the principle of unfettered public access in this area. The other two (G and D), sprawl lengthways over an extensive area and run roughly parallel to Causeway Road. Together with the two further 12-storey towers indicated for Precinct 2B, they would form a near-continuous mass of monolithic large buildings, effectively privatizing the view of the river for Newport Quays residents, and presenting residents from the surrounding established suburbs with an experience akin to looking at the back of an extremely high grandstand. (It should also be emphasized that the east-west orientation of these tower blocks will make them unsatisfactory on environmental grounds. The only explanation for them being oriented in this way is the narrow commercial objective of maximizing saleable 'water views').

Moreover, much of the remainder of the Precinct 2B area is now shown as covered by multi-level structures for residents' parking, in some cases with a façade of 2-storey town houses in front of it. This represents another major element of monolithic built form introduced by the proposed development, lower in height than the apartment towers but

also highly unsatisfactory. It also runs directly against the rationalization for multiple 12-storey towers given by Newport Quays at an 'open to the public' presentation to Council some months ago. On this occasion, the claim was that having more very high buildings would allow them to reduce the overall building footprint, leaving the area as a whole more permeable and with more open space. In practice, any potential for more open space is to be eaten up by more parking, which is a direct consequence of the drive for so many high buildings, and associated population densities, in this area.

Lack of permeability from surrounding suburbs and 'gated community' atmosphere

The Development Plan emphasizes the importance of creating an active gateway to the Port River waterfront from the established suburbs to the west of the new development. Major view corridors (and activity corridors) through the development are clearly an important part of this, but beyond this it is clearly desirable that the overall streetscape of the new development be as normal and permeable as possible, with various smaller streets and lanes facilitating this kind of east-west movement.

As noted earlier, the major corridor from the Semaphore Road/Causeway Road intersection now falls completely outside precinct 2B, as Newport Quays now defines that area. But another important corridor does fall within this precinct, running from Causeway Rd immediately south of Glanville station down to a proposed 'water room', achieved by making a cut into the existing alignment of the river bank almost opposite Harts Mill. The potential of this corridor to form a major axis of public activity and access – as opposed to a token public thoroughfare in a de facto 'gated community' – is seriously compromised in the new proposals. Instead of ending in a genuine, substantial public square and significant jetty projecting out over the water (the term 'jetty' is used on the plan but it is quite misleading) this corridor is to be truncated to the extent of *not even reaching the existing alignment of the river*. It ends instead in a 'water-room' cut back into the bank and enclosed on three sides with residents' accommodation. There is some token provision for retail establishments fronting a part of the corridor back from the river, but not even a token presence around the water. All that members of the 'outsider' public will be able to do at this important intersection with the river is to look at other people's houses and other people's boats. From their point of view the main function of the water-room will be to interrupt the free flow of the waterfront promenade, reinforcing the impact of the above-water accommodation tower in this respect.

Finally, the prospects for a normal and permeable streetscape in Precinct 2B, allowing people a choice of various paths through from the west of the development to the river, will be effectively precluded if the north-south sprawl of 12-storey towers, surrounded by 2 to 4 storey parking and town-house structures, is approved. People wishing to move through the development to the water will be funneled into a couple of 'approved' corridors through what, in other respects, presents as something of a 'gated community'. This kind of result, and the de facto privatization of the waterfront associated with it, would run seriously counter to the spirit of the existing development plan - to say nothing

of the broader public interest in a reasonable and equitable outcome from the redevelopment of public land in such an exceptional location.