

## Port Adelaide Resident's Environment Protection Group



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Gabrielle McMahon  
Senior Planning Officer  
**ASSESSMENT BRANCH**  
**PLANNING SA**  
Email: McMahon.Gabrielle@saugov.sa.gov.au

7<sup>th</sup> November 2007

Dear Gabrielle,

**Re: New Port Quays Development Application 040/2673/07 for Precinct 2b, Port Adelaide Re-development**

The Port Adelaide Residents Environment Protection Group (PAREPG) has been operating at a grassroots level in the Western Suburbs of Adelaide for over 20 years and was formed to provide a voice for residents in the area, on environmental and social issues. It is essential to us that each stage of the redevelopment is in line with the needs and aspirations of the existing community of the Port, and with critical ecological standards to restore the effects of past pollution.

PAREPG has been actively involved in previous issues of development and redevelopment in the Port, going back many years; concerns about the unaccountable Port Centre Committee, the late unlamented Multi-Function Polis project, the struggle for a Western Regional Park on the riverbank, and the long (and far from finished) campaign to clean up the Port River being some of the most relevant to the present redevelopment.

We would like to take this opportunity to comment on the recent development application by Newport Quays for the Precinct 2b in the Port Redevelopment Project which has been given a Category 2 classification.

The consultation phase managed by the Land Management Corporation during the first Port Redevelopment PAR left a lot of local people feeling largely ignored, and very angry. There is a history in Port Adelaide over the last couple of decades of "community consultation" being a process where by residents and community groups are invited to express their views, with little demonstrable evidence that those views are incorporated into policy. Unfortunately, this is not about democracy and is not "consultation", but is something far more sinister, because it wastes people's time. By the time policy decisions are made, and people realise their views have been ignored, it's too late. In effect, it's ultimately about disempowering people. Community sentiment surrounding the Port Redevelopment reflects this view.

An example of this process is demonstrated by the "community consultation" phase that the Land Management Corporation managed by establishing the Port Adelaide Redevelopment Stakeholders Forum, which met between September 2000 and September 2001. There was a representative of PAREPG on that forum, and a number of other community representatives from a wide range of groups. Over a number of meetings a remarkable degree of consensus emerged on what the community we represented wanted (and didn't want) in the redevelopment. They included:

*Built form that respects and enhances maritime heritage and character ...development at a density that is appropriate to the scale and heritage character of the area with adequate access and parking provision...*

*A range of affordable and innovative housing options that reflect and complement the character of the Port and embrace the latest technologies. Affordable housing should be provided to encourage social mix and diversity and to prevent gentrification and the development of 'exclusive ghettos'. Affordable housing authorities should be involved to address the need for low income housing in the area...*

*Public access should be provided to the whole of the waterfront area to encourage recreational use and tourism opportunities with due consideration given to industry requirements. However 'access' means more than being able to see the river – it requires provision of quality public space for events (including on-water events) and activities such as boat shows, community festivals, markets and ongoing cultural tourism venues...*

*There is a need for green and shaded public spaces preferably planted with local native trees. Access for the disabled should be a prime consideration in the design of these areas...*

*A coastal/river linear park should be constructed, for example, from the Ethelton mangroves to Cruickshank's Corner to restore public recreational access and local vegetation to the waterfront. This could also include interpretive signs/public art and amenities for community use.*

***Port Adelaide Redevelopment Stakeholders Forum  
Aspirations and Issues Statement, September 2001***

There are a number of areas in the development application that PAREPG is concerned with that do not address the community concerns above, which have been voiced over and over again.

We have structured this submission as follows. We have split it up into major headings listed below, and have taken the Objectives and Principles of Development Control from the Port Adelaide Enfield Council Development Plan.

1. Sustainability and the Environment
2. Amenity - Open Space, Public Space and Active Interfaces
3. Permeability and View Corridors

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## **1. Sustainability and the Environment**

**Council Wide** (Objectives and Principles of Development Control - Port Adelaide Enfield Council Development Plan).

**Objective 55:** To manage and conserve the 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.

The development application indicates that “*townhouse and apartment buildings will be fitted with tanks for rainwater collection and re-use for non-potable uses within the building (eg. Toilet flushing). All stormwater that is not being captured for re-use within the apartments and townhouses will be filtered through gross pollutant traps and bio-filtration trenches to ensure pollutants are removed prior to discharge*”.

The collection of rainwater is paramount to the sustainability of this project and with 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)”<sup>1</sup> which is a decision that the DAC has allowed. With a development such as this, that will have excess heating and cooling requirements due to the design of the buildings and exposure to Adelaide summers and winters, every effort should be made to maximise water collection facilities.

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

The design of these buildings leaves them largely exposed to the elements and to Adelaide’s scorching summer days, and cold winter nights. The buildings appear to be facing east and west, may with large windows with small to no eaves, provide little to no protection from the eastern and western sun. These buildings will require constant heating and cooling to provide acceptable living conditions, making them

expensive building to live in and environmentally “unfriendly”. With the recent general awareness of “climate change” and need to reduce energy usage, these buildings are not “cutting edge” or “world class” but will very soon be “out of date” and “politically unsound”. Especially 5-10 years in the future when government policy will be far more advanced and forward thinking in terms of sustainable urban design.

**Port Adelaide Centre Zone** (Objectives and Principles of Development Control - Port Adelaide Enfield Council Development Plan).

#### 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.

These buildings will be exposed to the elements as outlined above, by capturing and reflecting light and glare onto other 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 most major concern here is the impact that additional boats will have on the marine life (essentially the dolphins) through noise from motorboats but also, through the potential of being hit by boats. Sound travels easily over water and will effect local residents. The addition of a marina here, ontop of the existing Marina at Ethelton will dramatically change the existing peaceful amenity of the Port River.

#### **Waterfront Development**

##### Principles of Development Control

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;

This is a fundamental element of any responsible urban and regional area design, and any new buildings should always face north with correct eaves to repel the summer sun, and catch the winter sun. The development application indicates that the proposed 12 story buildings will face mainly in an east-west direction. The reasoning behind this is unclear and is in any case, is not an acceptable proposition. The developers have no restrictions to prevent them from doing this apart from those imposed by themselves, as they are building on an open landscape with no buildings close by to restrict this principle.

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 cross ventilation to enable cooling breezes to reduce internal temperatures in summer.

As outlined above, most of these buildings are facing east-west and do not prevent north facing windows with standard eaves, and will not reduce but maximise summer heat attraction. Those buildings in Precinct 2B tend to have only wall with windows which will not allow ventilation to flow through the buildings.

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.

As outlined earlier, there has been a reduction by the developers (with permission of DAC) to reduce the rainwater collection by 172,000 to 32,000 litres in precinct 2A. That is approximately by 4/5ths or the original collection rate. This demonstrates that the developers are not serious about sustainable water

practices and should be setting an example considering that the development sits besides the Port River. There should be no run-off at all into the Port River unless the water is of drinkable quality.

## 2. Amenity - Open Space, Public Space and Active Interfaces

### 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.

The existing boat yards and activities are some of the most important living trade, heritage and tourism activities that are currently taking place in the port, yet they are being moved out of Port Adelaide and some face closing down as a result. This demonstrates that the LMC and the developers do not treasure the heritage value of these boat yards and the business they conduct, and do not see the tourism potential and the value of these businesses to SA.

### Waterfront Development

#### Principles of Development Control

- 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.**

Three 12 story buildings are proposed in this precinct, and with the highest building currently in existence in Port Adelaide being a heritage building 7 storeys high (Harts Mill), these “space age” looking buildings do not blend in with the heritage nature of Port Adelaide. They will tower over the surrounding public space, stain the view and look from Port Adelaide and along view corridors, and were vocally rejected during each community consultation phase.

## 3. 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 and with wider sections in areas of high pedestrian or cycle traffic and in front of key tourism uses.

The developers have only allowed the minimum of 8 metres along the waterfront which provides linkages but in an area that is housing development. It does not provide an enticing environment for tourism purposes as one gets the feeling that they are intruding (as is the case at the Edgewater development) with towering buildings and private homes.

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.

As mentioned above, a housing development with an 8 metre buffer to the water does not provide a community environment which attracts the wider community. There is no space big enough to cater for larger outdoor public events. The provision of a “water room” in this development for the privileged boat owners has contributed to the reduction of public space. If the ‘water room’ was taken out of the design, more public space could be provided in this area which would fit better with the Principle.

### 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 urban identity of this area and the north western metropolitan area more generally.

The buildings size and width proposed by the Application have a much larger footprint than the original "portal" in the concept plan. The proposed buildings will create a wall of modern 12 storey high building with a style of architecture that is neither attractive nor in keeping with Port Adelaide's heritage values. When these buildings first appeared in the Messenger Newspaper a couple of months ago, there was community outrage which led to a public dispute between the consortium and the Port Adelaide Enfield Council. The community do not like the look, height and general design of the 3 x 12 story high buildings.

The members of PAREPG urge the Development Assessment Commission to take into consideration that we feel there has been a lack of "real community consultation" since the beginning of this multi-million dollar process, and urge you to consider the views of the community, who will be here long after the developers have left.

We urge you to protect our democratic rights to have a say and be heard, and protect our local Councils Objectives and Principles of Development Control (Port Adelaide Enfield Council Development Plan) and the meaning and sentiment behind the development of them. Our council has worked very hard to develop these controls to protect our built heritage, our environment and the people that live in it.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Fiona Pemberton'. The signature is written in a cursive, flowing style with a large initial 'F'.

Fiona Pemberton  
Co Secretary

**Footnotes:**

1.Port of Adelaide Branch of the National Trust SA, Submission in response to Development Application by Newport Quays for Precinct 2B of the Port Waterfront Redevelopment, 6/11/07, p13.