



**270 THE PARADE KENSINGTON GARDENS
PEREGRINE CORPORATION MIXED USE DEVELOPMENT**

Final
RESPONSE REPORT

PREPARED FOR | Peregrine Corporation

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1. INTRODUCTION

This Response Report is prepared in respect to a proposal to redevelop the Peregrine Corporation head office site at 270 The Parade, Kensington Gardens with a new mixed use development, including office, retail, temporary visitor accommodation, restaurant and fitness centre together with car parking.

This report should be read in conjunction with the amended plans, other supporting information and relevant specialist advice which is included as appendices. Also of relevance is the previous Development Report prepared in association with the subject application.

1.1 Section 46 Process

On 26 November 2015, the Chief Executive as delegate for the Minister for Planning made a declaration in the South Australian Government Gazette that the Peregrine Corporation mixed use development at 270 The Parade Kensington be assessed as a Major Development pursuant to Section 46 of the Development Act 1993 (the Act). The proposal is therefore considered to be one of major economic importance to the State.

On 22 September 2016, the Chief Executive as delegate for the Minister for Planning varied the declaration in the South Australian Government Gazette to provide greater clarity around the proposed mix of land uses including accommodation premises for business related purposes.

Section 46 provides for a specific and rigorous assessment of the proposal against a series of purposefully developed assessment guidelines established by the independent Development Assessment Commission (DAC). The amended Development Guidelines are included as **Appendix A**. The assessment must also have regard to the State's Planning Strategy and other key Government Strategic documents, the Development Plan and other relevant policies.

The Authority that will ultimately decide on the application is the Governor. The process to be followed for this project pursuant to Section 46D in accord with this declaration is set out below:

1. The proponent lodges an application with the Minister.
2. The application is referred to the Development Assessment Commission (DAC) to establish the level of assessment required and the guidelines for the assessment.
3. The Minister must provide the report of the DAC to the proponent and give public notice of the DAC's determination.
4. The proponent will then prepare a report addressing the guidelines and all other relevant information.
5. The proponent then submits this Development Report to the Minister who will refer it to the Council, other agencies and place it on public exhibition for 15 business days.



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6. Following exhibition the proponent is invited to respond to any public, Council or agency submissions and any other matters raised by the Minister in writing. Typically this will take the form of a “Response Report”. This is that Response Report.
 7. The Response Report is submitted to the Minister and the Minister will then prepare an Assessment Report. This report will be an assessment of the project considering any submissions, the proponent’s response, comments from the Council and agencies and any other matters that the Minister thinks fit.
 8. The reports are referred to the Governor for a Decision pursuant to Section 48 of the Development Act, 1993. The Governor may then approve, approve with conditions and/or reserve matters or, refuse consent to the project and gives notice of his decision by a notice in the Government Gazette.
 9. All of these reports, i.e. the Development Report, the Response Report and the Assessment Report are kept as publicly available documents for a time period determined by the Minister.

2. AMENDED PLANS AND REPORTS

MPH has prepared revised plans, an updated design statement and image themes which are provided at **Appendix B**. The final design has evolved through client review, Government agency submissions and public submissions. Key drivers that have impacted the built form include:

- *Desire to reference the historical nature of the area through the use of stone cladding but in a contemporary way to reflect modern office design;*
- *Strengthen the interface of the two influencing street grids that define the site;*
- *Create a “light glazed top” to the building to maximise views and daylight, and reduce scale of building;*
- *Form to be in scale with future and current higher scaled buildings, and be iconic to reflect the dynamic nature of the owner occupier;*
- *External deck and continuous perimeter walkway at level 03 (top of podium);*
- *Environmentally sustainable;*
- *Minimise car park impact;*
- *Improve the public realm interface of the site to Bowen Street.*

As compared to the proposal which was the subject of public exhibition, the following amendments are proposed:

- *Basement area reduced in north-west and north-east corner by deleting storage and reducing the area of the secure car park;*
- *Ground Floor floor-to-floor height increased to 4200mm from 3600mm;*
- *Level 1 floor-to-floor height increased to 4500mm to allow for tiered seating in training theatre;*
- *End of Trip facilities added to Level 1;*
- *Level 2 deleted;*
- *Level 2, 3 and 6 floor-to-floor height decreased to 3800mm from 4200mm;*
- *Level 4 and 5 floor area increased to include walking track with perimeter tenancy glazing as part of fritted glazed screen; and*
- *Level 5 verandah over hang and atrium roof solid in lieu of glazing.*

In summary, the deletion of one floor level has resulted in a building height of 34.85 metres as compared to 38.15 metres, representing a reduction of 3.3 metres. This amendment has also resulted in a reduction in the floor area for office space and training/meeting rooms. A total floor area of 9,060m² is proposed, compared to the original floor area of 12,290m², a reduction of 3,230m².



3. RESPONSE TO GOVERNMENT AND AGENCY SUBMISSIONS

Submissions were received from the State Heritage Unit, the Office of Design and Architecture SA, Department of Planning, Transport and Infrastructure and the City of Norwood, Payneham & St Peters. Copies of these submissions are included in **Appendix C**.

Table 3.1 below summarises these submissions and the key points raised, provides a response commentary and describes any resultant action arising.

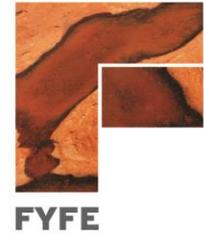


Table 3.1 Summary of Agency Submissions

Authority	Summary of Submissions	Comments	Resultant Action (if any)
<p>State Heritage Unit</p> <p>Department of Environment, Water and Natural Resources (DEWNR)</p>	<p>Considers the proposal acceptable in relation to the State heritage places in line with reasons identified in the DASH Heritage Impact Assessment.</p> <p>Recommends a condition that the proposed façade detailing and materials are further documented to the satisfaction of the Government Architect and DEWNR.</p>	<p>Materials and finishes have been selected for their visual amenity qualities, suitability for the locality, durability and low maintenance properties.</p>	<p>The applicant has submitted further details of materials and finishes provided as part of Appendix B.</p>
<p>Office for Design + Architecture for SA</p>	<p>Further consideration of the upper level cantilevered façade, its geometry and visual impact be considered.</p> <p>The building is potentially a new gateway building to The Parade Precinct, and support is subject to the scheme’s contribution to the public realm.</p> <p>Recommends exploration of opportunities to relocate a greater portion of the above ground parking to basement levels.</p> <p>Recommends relocation of central plant rooms with a view to minimize visibility and potential overshadowing onto Bowen Street.</p>	<p>Consideration of these matters is assisted having regard to the details and materials sample boards for the proposed façade treatments.</p> <p>The site currently offers a minor contribution to the public realm. The proposal represents a vast improvement to the current amenity and interface with the public realm.</p> <p>This matter has been the subject of considerable design debate. Relocated the parking to the basement levels has been assessed and has proven unfeasible.</p> <p>The height of the building has been reduced to minimize overshadowing onto Bowen Street.</p>	<p>The applicant has submitted further details of materials and finishes provided as part of Appendix B.</p> <p>Refer to OXigen’s landscaping plan and additional care/maintenance strategies to ensure that a quality interface will be maintained.</p> <p>No action.</p> <p>Refer revised plans.</p>



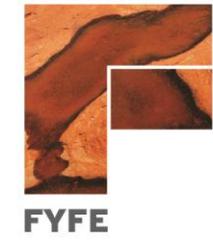
Authority	Summary of Submissions	Comments	Resultant Action (if any)
	<p>Detailing of façade is critical to a successful design outcome that is commensurate with the distinctive location.</p> <p>Recommends conditions or reserved matters addressing:</p> <ol style="list-style-type: none"> 1. Additional details and materials sample boards for façade treatments; 2. Demonstrate maintenance and access strategies for landscaping to ensure quality podium interface; 3. Clarification of the amendments to the public realm at the northern boundaries relating to landscaping within the future road widening location. 	<p>Noted.</p> <p>The applicant submits that the materials submitted are sufficient to ensure that there are no reserved matters attaching to this proposal.</p> <p>The applicant submits that maintenance strategies are operational matters and should not form part of the planning approval. Peregrine are amenable to a condition of approval that the landscaping be maintained to the reasonable satisfaction of the DAC.</p> <p>To be addressed following further negotiation with DPTI.</p>	<p>The applicant has submitted further details of materials and finishes as part of Appendix B.</p> <p>N/A</p>
<p>Department of Planning, Transport and Infrastructure</p>	<p>Overshadowing</p> <ul style="list-style-type: none"> - Provide pre-development (ie current) overshadowing diagrams to demonstrate the actual impact of the proposal on overshadowing. - Provide further analysis of the impacts of overshadowing to dwellings on Bowen Street and beyond – High Street and Phillips Street. The DR does not provide a detailed analysis of whether 50% of the private open spaces and 50% of the north facing windows on affected dwellings receive the minimum hours of direct sunlight in accordance within PDC 195 and 196, for both the current situation and the proposed scenario. 	<p>The current office building on the site has parapet heights ranging from 7850mm to 4600mm along High Street, and heights ranging from 4080mm to 6070mm along Bowen Street. At these heights, the current building has no material impact on overshadowing on the residential properties along Bowen Street and beyond. The impacts of the proposal (at the lower height) are shown on the attached solar diagrams.</p> <p>The solar diagrams show that between 9am and noon during the winter, the residents along Bowen Street will have no overshadowing from the proposed development.</p>	<p>The amended plans have reduced the height, scale and visual bulk of the proposal and therefore associated overshadowing impacts. Overshadowing diagrams have been provided as part of Appendix B.</p>



Authority	Summary of Submissions	Comments	Resultant Action (if any)
	<ul style="list-style-type: none"> - This assessment should address the comments made by Council in relation to exceedance of the Development Plan requirements. Impact to solar panels from overshadowing. Overlooking - Explanation of the impacts of overlooking with the revised design, including beyond the Bowen Street dwellings. - Additional sections are required to show the extent (if any) of overlooking south of the subject site to the adjacent Mary Mackillop Centre / Tappenier Court Nursing Home. 	<p>This satisfies the requirements of PDC 195 (the properties will get direct sunlight for a min of 3 hours) and 196 (they will get direct sunlight for more than the minimum 2 hours).</p> <p>The property on High Street (Tappenier Court) will have direct sunlight from approximately 2pm onwards. This satisfies the requirements of PDC 195 and may satisfy PDC 196.</p> <p>The impacts on solar panels can be referenced to the solar diagrams.</p> <p>It is acknowledged that a building of this scale will result in a level of overlooking into adjoining properties, however direct views into habitable rooms or private open space is minimised.</p> <p>Section plans have been amended to demonstrate the potential for overlooking.</p>	<p>The applicant has attempted to mitigate the impacts of overlooking by incorporating specific design elements including; setbacks between the podium level (between Level 2 and Level 3) and fritted glass screens cantilevered from the main building facade.</p>



Authority	Summary of Submissions	Comments	Resultant Action (if any)
	<p>Heritage & Context</p> <ul style="list-style-type: none"> - The analysis regarding the visual impact of the development when viewed from the North and South along Portrush Road is very brief (pg 20 of the Heritage Impact Statement). The images (21 and 22) provided to accompany this analysis view the development at an angle, not directly north/south along Portrush Road. Additional imagery and further analysis is required regarding the impact to the heritage context / character from the north and south. - Provision of elevations that illustrate how the building will sit in relation to the adjacent heritage buildings, the water tower, and the approved buildings on The Parade (eg Nuovo). - Consider the use of a 3D model. <p>ODASA</p> <ul style="list-style-type: none"> - Further consideration of the upper level cantilevered façade (geometry and visual impact) - Further consideration of ceiling heights - Further refinement of the façade treatments 	<p>The analysis of the impact of the proposal when viewed from North to South along Portrush Road has been undertaken. A change in the angle of the imagery does not, in the applicant's opinion, assist in the assessment of the impact or alleviate any impact of the proposed building in situ.</p> <p>The applicant does not propose to amend the upper level cantilevered façade of the building.</p> <p>The façade treatments are outlined in MHP's updated Theme Images board.</p>	<p>An updated assessment from DASH architects in relation to the amended design is included as Appendix D.</p> <p>MPH has prepared elevations which show the proposed building in relation to the adjacent heritage sites and Nuovo Apartments.</p> <p>The applicant has reduced the ceiling heights of level 2, 3 and 6 in addition to one floor level of the building being removed.</p>



Authority	Summary of Submissions	Comments	Resultant Action (if any)
	<ul style="list-style-type: none"> - Further design development of the scale and distribution of outdoor spaces with a view to reducing the scale and bulk of the building - Consideration of the engineering requirements for the upper level glass façade to achieve the vision depicted in the design drawings. - Provision of a materials board. <p>Traffic</p> <ul style="list-style-type: none"> - Response to DPTI comments in particular the proposed Reserved Matters and Conditions. 	<p>The external fritted glass achieves a reduction in the overall visual bulk of the building by giving a lighter appearance to the upper levels. The cantilevered element is considered critical to achieving this outcome and the external walkways will utilise the space created between the main building façade and the glass. This is considered to be a reasonable design response.</p> <p>The applicant has considered the engineering requirements for the façade treatment and has also obtained a quantity surveyor’s report on the costs of delivering the project. For this stage of the design (being planning), it is considered unreasonable for the applicant to provide engineering details at this time.</p> <p>The applicant is in direct communications with DPTI (Transport Services) on these requirements.</p>	<p>The total height and floor area have been reduced.</p> <p>Noted.</p> <p>A materials board is being prepared by MHP for submission.</p> <p>Updated GHD Report (see Appendix E).</p>



Authority	Summary of Submissions	Comments	Resultant Action (if any)
	<p>Car Parking</p> <p>Further explanation, analysis and justification is required regarding the proposed car parking arrangements:</p> <ul style="list-style-type: none"> - For each land use (office, restaurant, training rooms etc) when is the peak (parking) period, and what overflow is expected beyond the car parking spaces provided in the building? - Further explanation regarding the nature / frequency of use for the training theatre and the resultant demand for car parking. 	<p>Land use; peak parking period and overflow expectations as follows:</p> <p>Office - 8-5pm - Considerable surveys were undertaken of the current staff profile (including mode share and parking requirements). The revised design now provides 225 car parking spaces and 10 motor cycle parking spaces with a gross floor space of 9060m². Research has shown that the anticipated demand range varies significantly based on the referenced parking standard documents.</p> <p>It is typical of any development within a CBD environment that employees travel and park using the facilities available with no expectation of site parking.</p> <p>In view of the current mode choices made by staff, the available public transport opportunities and longer term potential tram services along The Parade, overflow parking patterns are expected to reflect the existing use preference for local streets which has a conservative capacity of more than 300 spaces within 400m of the site.</p> <p>Restaurant - 12-1pm Weekday, 7-8pm Sat - The peak restaurant demand is expected to be Friday and Saturday evenings after completion of the business hours.</p>	



Authority	Summary of Submissions	Comments	Resultant Action (if any)
	<p>- How will the projected increase in staff numbers (up to 400 in 3 years) be accommodated?</p>	<p>Training Rooms - 10-2pm - The training rooms and theatre will typically cater for OTR staff on an infrequent basis and experience shows that staff attend utilising public transport or are already on site.</p> <p>Café/Retail-12-1pm 7-8pm Sat - The café/retail will serve staff already on site during the week or passing pedestrian trade and is not planned as a weekday destination facility. The peak demand for the café will be on a Saturday when the majority of car parking spaces will be available.</p> <p>Gymnasium / Pool /Spa- 6-7pm - The peak usage of these land uses will be after normal business hours and will include employees already on site. Shared use of the onsite supply of 225 spaces will be supported by > 300 available spaces within the local street system.</p> <p>The applicant intends to - advocate mode share by the provision of 'end of trip facilities' and use of public transport, this will be further enhanced should the planned tram services along The Parade eventuate. As indicated earlier in a CBD/near city situation staff will have no expectation of site parking.</p>	



Authority	Summary of Submissions	Comments	Resultant Action (if any)
	<ul style="list-style-type: none"> - What is the capacity for on-street parking in the surrounding residential streets? - Has there been any consideration of opportunities to utilise other car parking facilities in the locality? - What will be the car parking arrangements during construction to minimise impacts to traffic flow and amenity on residential streets? Is there any capacity for additional basement parking? Other - Impact to wi-fi connectivity in the locality: concerns that the building will block signals from the water tower infrastructure. Has this been considered? - Additional plans and further explanation is required regarding the accommodation layout – suite delineation, access arrangements, connectivity with other uses on the Level & after hours access. 	<p>On street parking surveys have not been undertaken however as a conservative estimate more than 600 parking spaces would be available within a 400m catchment of the site. Assuming resident parking and other parking occurs then a 50% availability (>300 spaces) is a reasonable estimation.</p> <p>There are no public car parks within close proximity to the site. The Applicant does not have any plans to make formal use of another off road parking facility.</p> <p>Regarding arrangements for car parking during construction, we refer to the item above. Where Council permits on-street parking, these are available to the general public and impacts on the amenity on residential streets will not change.</p> <p>There is no additional capacity for basement parking.</p> <p>Issues regarding wifi connectivity are issues for the telecommunications service providers.</p> <p>The accommodation layout is a fit out consideration. Without a planning approval, the applicant has not incurred the expense of documenting the building to that level of detail.</p>	<p>No action required.</p> <p>No action taken.</p>



Authority	Summary of Submissions	Comments	Resultant Action (if any)
	<ul style="list-style-type: none"> - The GHD Traffic Report found as part of this Response Document has been updated. - The Guidelines document included in the DR is not the most recent version. 	<p>The GHD report was finalised following negotiations with DPTI.</p> <p>The most recent guidelines document is appended to this Response Report.</p>	<p>Updated GHD Report (see Appendix E).</p> <p>No action required.</p>
City of Norwood, Payneham and St Peters	<p>The land is not appropriate for the establishment of commercial uses of the sale and intensity that is being proposed.</p> <p>Heritage- the advice from the State Heritage Unit has been received and responded to above.</p>	<p>The site is presently used as office premises. This will continue to be the dominant use as part of the proposal. The site needs to provide quality office space to meet the demands and operations of SA's largest private company, together with providing training facilities for its 2500 + staff members. The other commercial uses are ancillary.</p> <p>Furthermore this proposal is following the assessment path of a major project and as such the Development Plan is only one element to be taken into consideration as part of the assessment process. The specific guidelines set by the DAC (see Appendix A) as forming the guidelines for the Development Report envisage the uses and intensity proposed.</p> <p>The State Heritage Unit is supportive of the proposal, including the measures taken by the applicant to mitigate the impact of the site on the primary settings and view corridors of the Clayton Wesley Church.</p>	<p>No action required.</p> <p>No action required.</p> <p>Refer amended plans.</p>
	<p>Built form and setbacks- Council is of the view that the building is too large and too overbearing.</p>	<p>Notwithstanding the fact that the Development Plan envisages 2 storey building, the major project declaration and Design Guidelines envisaged a larger scale development for this site. Steps have been taken to mitigate its visual bulk through the deletion of one floor and impact on the amenity of surrounding properties.</p>	<p>No action required.</p>



Authority	Summary of Submissions	Comments	Resultant Action (if any)
	Traffic and parking impact – Council notes that 644 car parks are required under the Development Plan, whilst the proposal offers only 416 Parks. Council expresses concerns that the serious shortcomings in parking will result in the reduction in convenience and amenity to local residents and businesses.	Refer to response to DPTI comments on this matter.	Final GHD Report (see Appendix E).



4. RESPONSE TO PUBLIC SUBMISSIONS

A total of 38 representations provided as **Appendix F** were received during public notification of the proposed development. A high level analysis of the public submissions indicates:

- 11 were in the form of a pre-prepared pro-forma letter;
- Two submissions from the Norwood Residents Association and the Kensington Residents Association; and
- A submission was received from the adjacent Clayton Wesley Uniting Church.

4.1 Key Issues

A review of the representations and response to the issues raised is set out below in Table 4.1.

Table 4.1 Summary of Public Submissions

Comments	Response
Design does not complement the historic nature of the area.	DASH has prepared a Heritage Impact Assessment (see Appendix D) which considers the proposed development having regard to the heritage fabric of the locality. In their Supplement dated 22 November 2016, they have noted that the amended plans have reduced the physical and visual bulk of the proposal and in turn any heritage impacts.
Bulk and scale inappropriate for locality; detracts from the appearance of the Church & other heritage items.	<p>The design incorporates a strong podium base (of a more monolithic, fine grained character), and visually 'lighter' upper levels. The use of a 'flowing veil' upper façade skin visually softens the upper storeys, and creates a contrasting backdrop to the strong geometric forms of the Clayton Wesley Church spire.</p> <p>This has been assessed by DASH, who has formed the view that the overall articulation, and careful use of materials, significantly mitigates the overall visual bulk and scale of the proposal in the context of its immediate surrounds. This view is supported by the response of Heritage SA.</p> <p>The design also incorporates a number of setbacks which, in addition to mitigating the overall visual bulk and scale of the building:</p> <ul style="list-style-type: none"> - retain views of the Clayton Wesley Church from Portrush Road; - provide a lower scale interface to the adjoining Residential Zones, particularly along Bowen Street. <p>Below is a realistic assessment of the impact of the proposed building having regard to the Clayton Wesley Church and the iconic view which representors are keen to protect.</p>

	 <p>Image 16.Views of proposed development (indicative red mass) from the western end of The Parade.</p>  <p>Image 17.Views of proposed development (indicative red mass) from the western end of The Parade, approaching the Portrush Road intersection.</p>
<p>Significant adverse impact on adjacent Historic Kensington Conservation Zone</p>	<p>The site is not located within an Historic Conservation area; the site’s eastern side (Bowen Street) and southern side (High Street) interface with the Residential Historic (Conservation) Zone.</p> <p>An inspection of the current site reveals that:</p> <ul style="list-style-type: none"> - The western side of Bowen Street is characterised by existing warehouse and carpark facilities; - The eastern side of Bowen Street is primarily warehouse facilities or modern townhouses; - The northern side of High Street is characterized by the sites existing office accommodation which offers low visual amenity; and - The southern side of High Street accommodates c1970 two storey structures associated with the adjacent Mary MacKillop Centre. These buildings do not interface with the street, but rather are set back behind a tall masonry wall. <p>Whilst the proposed development will be taller than the existing building, it has been assessed by DASH to have “negligible impacts on the amenity and character of the interface” because:</p> <ul style="list-style-type: none"> - The current residential and historic character of High Street along this frontage is low/poor; - The existing interface of the site with High Street is relatively poor.

<p>Increased traffic congestion on the Parade between Portrush & Phillips Street.</p> <p>Complaints that OTR cars park on the Parade and reduce the traffic to one lane as car approach the intersection.</p>	<p>The site already houses approximately 250 head office staff and vast numbers of visitors to the premises (for training purposes, and meetings). This is not proposed to change other than providing more on-site parking. The same number of staff members will access the premises (and these staff will be the primary users during office and peak hours) and use the surrounding road network whether or not the development proceeds.</p> <p>Council's parking regulations permit cars to be parked along The Parade at certain times. These spaces are used by all members of the public and not just Peregrine's staff. Congestion caused by lawful conduct is not a matter Peregrine are required to address.</p>
<p>Increased traffic congestion – High Street and at school pickups traffic is banked up past Phillips Street.</p>	<p>There a number of existing contributory causes to traffic congestion within the surrounding road network including nearby schools.</p> <p>The submissions do not highlight the fact that the site is currently used as Peregrine's head office for 250 staff members presently. These staff members are the primary users of the site and this is not expected to change or exacerbate any existing problem.</p> <p>Contrary to the claims of some submissions, the proposal will offer more on-site parking to staff which will in turn result in less vehicles parking on and using the surrounding streets. Peregrine anticipate that with less vehicles using on street parking in the vicinity of the site, traffic congestion should ease.</p> <p>Further responses to traffic and parking matters will follow under separate cover.</p>
<p>Increased traffic on Bowen Street</p>	<p>This application does not include any modifications of Bowen Street traffic (outside the scope of the application and would only be pursued with approval from Council as this is a Council controlled road).</p> <p>The modification if agreed by Council will see the short section of Bowen Street changed into a two way street to facilitate service vehicles only. All other traffic will be limited to one way.</p>
<p>Queuing across footpath creating a dangerous situation for pedestrians who walk down towards The Parade.</p>	<p>This action is no different from cars turning onto and off The Parade to side streets which adjoin The Parade.</p> <p>The access points have been designed to meet Australian Standards and take into account, among other things, safe sight lines to protect the physical wellbeing of pedestrians.</p>
<p>Inadequate parking on site (including future growth expected in higher staff numbers & during construction)</p>	<p>A majority of commercial properties and businesses along The Parade offer no or negligible off street parking. The nearby schools and Mary MacKillop Centre offers very nominal off street car parks.</p> <p>Further responses to traffic and parking matters are contained in Table 3.1.</p>
<p>Abuse of planning system</p>	<p>The Development Act makes available the major project assessment path.</p>
<p>Overshadowing/overlooking</p>	<p>The upper storeys are further set back from the podium edge to all main street frontages, with the greatest offset of 11m provided to Bowen Street and the opposing north/east projection towards The Parade and Portrush Road intersection.</p> <p>These measures are designed to mitigate overshadowing and overlooking.</p>



	<p>The amended plans have reduced the height, scale and visual bulk of the proposal and therefore associated overshadowing impacts.</p> <p>Amended shadow diagrams have been prepared to assist in the assessment of the amended design and are attached in Appendix B.</p>
Reflections from the proposed building will effect visibility at this intersection and have an adverse impact on road safety.	<p>The risk of potential reflection at ground level is difficult to measure. We note, at the podium level the building is constructed of sandstone, being a non-reflective material.</p>
Hours of operation – restaurant & fitness centre – impact on noise, light and traffic.	<p>This has been assessed and addressed through the various expert reports submitted as part of the application.</p>
Declining home values	<p>There is no objective evidence to support this proposition. This is not a relevant planning consideration.</p>
Waste Management – concerns have been raised in relation to the location of refuse and potential noise and odour nuisances due to rubbish collection. Rubbish will be collected daily in order to reduce the potential of odour nuisance.	<p>All bins on site will be collected and emptied once a day by qualified contractors. Loading collection times will be conditions of approval. These activities are undertaken by contractors who will be instructed as to the relevant times for activities.</p>
Noise Sources – concerns were raised in relation to potential noise created by the mechanical plant on the rooftop, additional traffic, and vehicle movements in the car parking building.	<p>It is noted that a detailed assessment of the acoustic treatment required to achieve required standards will be conducted during the detailed design phase of the project, as required by relevant authorities.</p> <p>Notwithstanding, Sonus provided preliminary advice with the original Development Report, which stated that the building will be able to achieve policy recommendations, with some necessary provision of acoustic treatment for some of its elements, and that “the proposed development satisfies the relevant provisions of the Norwood Payneham and St Peters Development Plan and the requirements of the DAC guidelines”.</p>
Light - concerns were raised in relation to light spillage from the building.	<p>A sustainability report was prepared as part of the original design, which stated that the:</p> <p><i>Design of external lighting [will] minimise intrusion into neighbouring properties. This process will extend to the lighting of Bowen Street to ensure that appropriate illumination is provided.</i></p> <p>Further, outside of working hours, “lights are deactivated automatically”.</p>
Wind - Concerns were raised, particularly from owners/residents of Nuova, in relation to potential wind tunneling effects on their properties.	<p>It is noted in the Development Report that “wind effects have been considered and assessed and satisfy the expectations of the Development Plan”.</p> <p>Given the distance between both sites, it is highly unlikely that any wind tunnel effects affect Nuova properties.</p>



5. CONCLUSION

The Public Consultation undertaken in accordance with the Section 46D of the Act has revealed that height, scale, built form, traffic, car parking, overlooking and overshadowing are the primary issues raised.

In response, the proponent has fully considered these issues and has modified key components where necessary, in particular:

- Reduction in height;
- Reduction in total floor area;
- Increased setback from Bowen Street;
- Additional façade treatments; and
- Reconfiguration of the internal components to facilitate these amendments.

The balance of matters raised has been responded to through the provision of further information and justification where appropriate.

The result is a building design that incorporates a refined podium to respond to the existing lower scale development in the locality, whilst enabling a taller tower element to appear visually 'lighter' through the upper levels. The proposed building is of a high quality and this is reflected in the design and the external material selection. The result is a landmark building in a gateway location.



APPENDIX A DEVELOPMENT GUIDELINES

GUIDELINES

For the preparation of a

DEVELOPMENT REPORT

**Peregrine Corporation Mixed Use Development
270 The Parade, Kensington**

Peregrine Corporation

September 2016



Department of Planning, Transport and Infrastructure

www.sa.gov.au

**Development Assessment Commission
South Australia**

www.dac.sa.gov.au

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1. BACKGROUND

On 26 November 2015, the Chief Executive as delegate for the Minister for Planning made a declaration in *The South Australian Government Gazette* that the Peregrine Corporation mixed use development at 270 The Parade Kensington be assessed as a Major Development pursuant to Section 46 of the *Development Act 1993* (the Act).

On 22 September 2016, the Chief Executive as delegate for the Minister for Planning varied the declaration in *The South Australian Government Gazette* to provide greater clarity around the proposed mix of land uses including accommodation premises for business related purposes.

Section 46 of the Act ensures that matters affecting the environment, the community or the economy to a significant extent, are fully examined and taken into account in the assessment of this proposal.

The major development process has six steps:

- The Development Assessment Commission sets the level of assessment (Environmental Impact Assessment, Public Environmental Report or Development Report) and provides guidelines (**this stage**)
- Proponent prepares an Assessment Document (in this case a Development Report)
- Public and agency consultation on the Assessment Document for a period of four to six weeks depending on the level of assessment
- Responding to public comment on an Assessment Document
- Assessing the proposal and releasing the Assessment Report
- Decision

This document is the guidelines as set by the Development Assessment Commission specifically prepared for this application. The Development Assessment Commission (Commission) has determined that the proposal will be subject to the processes of a Development Report (DR), as set out in Section 46D of the Act. The Commission's role in the assessment process is now completed. From this point the Minister will continue with the assessment under Section 46 of the Act.

2. DESCRIPTION OF PROPOSAL

The proposal comprises the construction of a mixed use building together with associated storage and car parking for the redevelopment of Peregrine's head office to meet the companies growing demand for quality office space and improved work facilities and amenities.

The application conceptually comprises the following:

- Demolition of all existing structures within the site and construction of a seven (7) storey building comprising;
 - Ground floor retail and/or cafe floor space,
 - Office tenancies over six (6) levels including reception, meeting spaces, digital hub, training spaces and decks;
 - Level 7 restaurant and members lounge, decks, gym with spa and pool, and accommodation suites
 - 296 car parking spaces over four (4) levels, 12 motorcycle parking spaces, 120 employee bicycle parking spaces and 20 visitor bicycle parking spaces
- Two-way access from The Parade, two-way access from High Street, and two-way access from Bowen Street (loading and service vehicles only)
- A change in the use of land associated with any development on the site;
- Any related or ancillary development associated with development listed above.

3. MAJOR DEVELOPMENT PROCESS AND ROLE OF GUIDELINES

- These Guidelines are prepared to inform the preparation of the Development Report (DR). They set out the assessment issues associated with the proposal along with their scale of risk as determined by the Development Assessment Commission.
- The DR must be prepared by the proponent in accordance with the Guidelines and should specifically address each guideline.
- Each guideline is intended to be outcome focused and may be accompanied by suggested assessment approaches. These suggestions are not exhaustive, and may be just one of a wide range of methods to consider and respond to a particular guideline.
- The DR should detail any expected environmental, social and economic effects of the development, and the extent to which the development is consistent with the provisions of the Councils Development Plan, the Planning Strategy and any matter prescribed by the Regulations under the Act.
- The completed DR is submitted to the Minister for public release, and is subsequently referred to Council and relevant government agencies for comment.
- An opportunity for public comment will occur when the completed DR is released. Public exhibition is undertaken for 15 business days. An advertisement will be placed in the *Advertiser* and local *Messenger newspapers* inviting submissions.
- Copies of the submissions from the public, Council and other relevant agencies will be provided to the proponent.
- The proponent may then prepare a 'Response Document' within 10 business days to address the matters raised during the Public exhibition period.
- The Minister then prepares an Assessment Report. The Assessment Report and the Response Document will be available for inspection and purchase at a place determined by the Minister for a period determined by the Minister.
- Availability of each of these documents will be notified by advertisements in *The Advertiser* and *local Messenger newspapers*. A copy of the DR, Response Document and the Assessment Report will be provided to the Council.
- When a proposal is subject to the DR process, the Governor makes the final decision under Section 48 of the Act.
- In deciding whether the proposal will be approved and any conditions that will apply, the Governor must have regard to:
 - Provisions of the Development Plan;
 - The Development Act and Regulations;
 - If relevant, the Building Code of Australia;
 - The South Australian Planning Strategy;
 - The 30 Year Plan for Greater Adelaide
 - The Integrated Land Use and Transport Plan
 - The DR and the Ministers Assessment Report;
 - Where relevant, any other government policy and/or legislation.
- The Governor can at any time indicate that the development will not be granted authorisation. This may occur if the development is inappropriate or cannot be properly managed. This is commonly referred to as an **early no**.

4. DEVELOPMENT REPORT (DR)

The DR should be presented in terms that are readily understood by the general reader. Technical details should be included in the appendices.

THE REPORT MUST INCLUDE THE FOLLOWING:

Information and Assessment

The provision of all information sought by the guidelines, together with consideration and assessment against each of the matters identified in Section 4 of these Guidelines.

Consistency with Policy and Legislation

The Act requires the DR to state its consistency with the relevant Development Plan and Planning Strategy, and other key policies and/or legislation as identified within these guidelines (refer to Appendix 2 for other 'useful documents').

Commitment to meet Conditions

The guidelines must state the proponent's commitments to meet conditions to avoid, mitigate, manage and/or control any potentially unreasonable impacts from the development.

THE REPORT SHOULD INCLUDE THE FOLLOWING:

Summary

A concise summary of the matters set out in Section 46D of the Act, including all aspects covered in the Guidelines set out below, in order for the reader to obtain a quick but thorough understanding of the proposal and all its effects.

Introduction

The introduction to the DR should briefly cover the following:

- Background to and objectives of the proposed development;
- Details of the proponent;
- Staging and timing of the proposal;
- Relevant legislative requirements and assessment process.

Need for the Proposal

A statement of the objectives and justification for the proposal, including:

- the specific objectives the proposal is intended to meet;
- expected local, state or national benefits and costs;
- a summary of environmental, economic and social arguments to support the proposal; including the consequences of not proceeding with the proposal.

Plans and Forms

- **Current Certificate(s) of Title**
- **Context and locality plans** should illustrate and analyse existing site conditions and the relationship of the proposal to surrounding land and buildings. The plan should be drawn to a large scale to allow presentation on a single sheet and be readily legible. The plan should indicate:
 - the neighbouring residential buildings on Bowen Street,

- location of state heritage buildings in relation to this site
 - the Mary MacKillop Tappeiner Court Nursing Home at 286 Portrush Road (backing onto High Street)
 - existing street trees
 - any other information that would help to set the context for the locality
- **Shadow diagrams** demonstrating the extent of overshadowing (pre and post development) on adjoining properties at 9am, 12noon and 3pm during the solstice and equinox.
 - A **landscaping plan** to be prepared which includes the location of any regulated or significant trees on the site and/or adjoining land.
 - Coloured high resolution **perspectives** of the proposal showing how it relates to the surrounding context from various locations, including streetscape perspectives, views at the human/pedestrian scale, as well as longer views from strategic approaches to the precinct.
 - **Site plan** (drawn at a scale of 1:100 or 1:200) clearly indicating the proposed buildings and works, including demolition.
 - **Elevations** (drawn at a scale of 1:100 or 1:200) are required for all sides of the building with levels and height dimensions provided in Australian Height Datum.
 - **Cross sections** of the building are required and should include ground levels, floor levels, ceiling heights and maximum height in Australian Height Datum.
 - Provide **floor plans** (drawn at a scale of 1:100 or 1:200) for each level of the building demonstrating what is proposed at each floor, with indicative internal layouts.
 - **Site survey** plan demonstrating the development will be contained within the allotment boundaries.
 - **Sequencing and staging plans** of the proposal if you wish to seek Building Rules Consent in stages.
 - A schedule of **materials and finishes and colours**.
 - Location and dimensions of any external **advertising displays**. If signs are to be illuminated or contain a moving display this needs to be included.

Specialist Reports and Details

- A **design statement** should provide an understanding the evolution of the proposal (including options explored and discounted) from the concept to the final design.
- **Transport, access and pedestrian impact assessment** prepared by a suitably qualified traffic engineer. The assessment should evaluate current and proposed access arrangements, car parking, as well as pedestrian and vehicle interface at the street level and the surrounding road network, and alternative travel options.
- **Waste management and minimization (for demolition, construction and operation)** demonstrating the location of waste storage (including separation of recyclables hard waste and e-waste) and disposal facilities on the site and provide details of how these facilities will be serviced.
- Provide a **noise assessment** prepared by an acoustic engineer to moderate external and environmental noise disturbance and amenity impacts for future occupants of the development, but also other sensitive uses within the immediate area as a result of the proposed development.

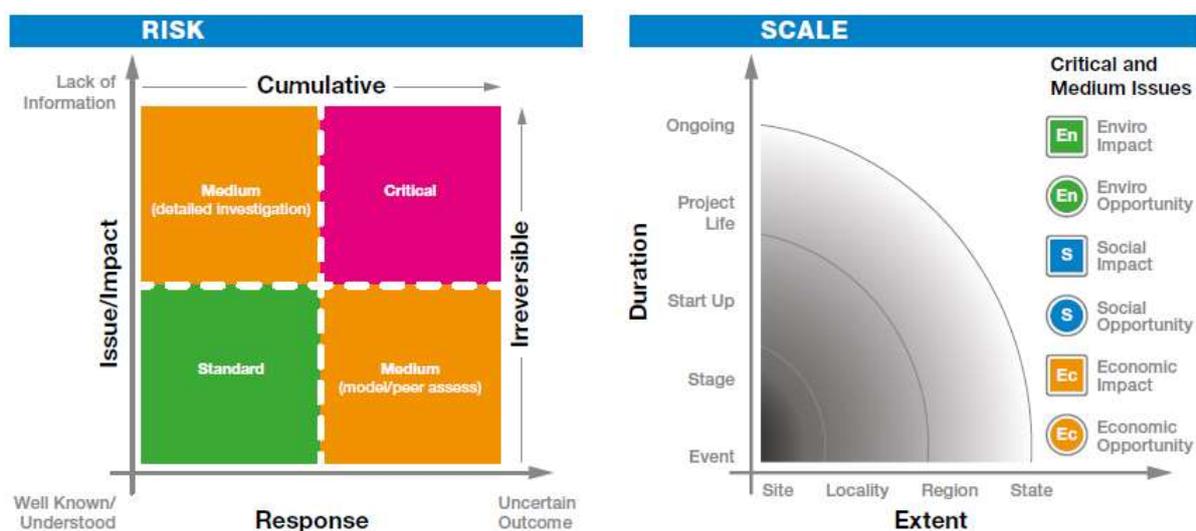
- Details of proposed **stormwater management/water sensitive urban design**, as well as any retention and reuse as part of the development, inclusive of details for connecting into any street drainage channel or council drain and the method of drainage and services proposed to be used. The proponent should have regard to the SA Water Sensitive Design strategy, particularly the performance targets.
- A **sustainability assessment** must be provided, and will outline the environmental sustainability measures (energy efficiency, use of renewable energy, water conservation etc) incorporated into the proposal. The State government's ESD guidelines (ostensibly for government buildings) may assist in this regard – <http://www.dpti.sa.gov.au/BuildingManagement/policies/esd>
- Provide **Crime Prevention Through Environmental Design (CPTED)** details which outline measures incorporated into the proposal to deter criminal behaviour through environmental design, including but not limited to:
 - Clear sight lines, directional devices and way finding;
 - Use of public lighting and CCTV cameras;
 - Active street frontages and balconies to encourage passive surveillance;
 - Identifiable building entry;
 - Provision of secure and private areas for residents;
 - Details of how the proposal addresses pedestrian amenity in the public realm.
- **Site history assessment** - Where a development is to occur on land that has the potential to be contaminated (through previous land uses) a site history assessment is required.
- Details of **site services and infrastructure** including utility services (water, gas, electricity, sewerage disposal, waste water, drainage, trenches or conduits); location of ground and roof plant and equipment (fire booster; electricity transformer; air conditioning; solar panels etc).

5. ASSESSMENT

Impact assessment is an important tool that enables the consideration of projects that might otherwise struggle to be addressed properly or fairly under the 'normal' assessment system.

In setting these Guidelines, the Development Assessment Commission has considered the scale of issues associated with the project and determined whether they represent issues or opportunities. The potential impacts and issues have then been organised according to the level of work and type of attention required by the Applicant: either standard, medium or critical:

- Where the issue is well known and the response is well understood then the risk assessment is classed as 'standard'
- Where work is required to address the issue but the risk is likely to be manageable with additional information then the risk assessment is classed as 'medium'.
- Where information about the issue is lacking and the response is unclear, the issue is classed as 'critical'.



The issues and impacts identified by the Commission as requiring standard, medium or critical level assessment are listed below. Each guideline includes a description of the issue/impact and a description of the action needed.

CRITICAL ASSESSMENT

Heritage Context

Guideline 1: State Heritage Places are located on the north west, north east and south west corners of the Parade and Portrush Road intersection, as well as the State Heritage listed Benson Memorial Drinking Fountain to the south of the subject site. The subject site is also adjacent two contributory items on Bowen Street and in close proximity to Local Heritage Places. It should therefore be demonstrated how the proposal respects and responds to the heritage context of this visually prominent intersection and the adjacent Residential Character Zone.

Evaluate the impacts of the proposal on the heritage context of the locality, taking into account scale, massing, configuration and design.

Design Quality

Guideline 2: The proposal will be a high quality landmark design for the site, the local area and the wider metropolitan area.

The proposal will respond to the Principles of Good Design by Office for Design + Architecture SA. The design will be developed through participation in the Government Architect led design review process. This process and its evolution shall be documented.

MEDIUM ASSESSMENT

Neighbourhood Interface

Guideline 3: The subject site is adjacent a Residential Character Zone at its Bowen Street and High Street interface. It should therefore be demonstrated how the interface impacts of the development on the neighbouring environs (including overlooking, overshadowing, noise, traffic generation and visual impact) will be managed.

Evaluate the impacts of the proposal on the locality, taking into account its bulk, scale and interface relationship to neighbouring residential development and nursing home, balanced with the expectation of increased development intensity.

Transport Planning

Guideline 4: The development proposes substantial new building works on a site affected by the Metropolitan Adelaide Road Widening Plan and is adjacent to a corridor identified within the Integrated Transport and Land Use Plan as potentially being impacted by a new tram line.

Identify any potential road widening and/or setback requirements necessary to facilitate future road improvements at this location with particular emphasis on public transport projects identified in ITLUP.

STANDARD ASSESSMENT

Public Realm Interface

Guideline 5: The proposal will respond to the public realm within the local area in a meaningful and positive way.

Evaluate the proposal's relationship within its urban public context, in particular its primary street frontages along The Parade and Portrush Road.

Traffic Impact

Guideline 6: The proposal includes two new access points, one on The Parade in close proximity to the Portrush Road/The Parade signalised intersection and one on High Street in close proximity to the Portrush Road/High Street junction. In this regard, the proposal should not result in traffic impacts to the adjacent roads, or create road safety issues at or along the roads, particularly Portrush Road. The safe and efficient operation of Portrush Road and The Parade as well as the Portrush Road/The Parade intersection and the Portrush Road/High Street junction must be maintained.

Evaluate the traffic impact of the development on the surrounding road network by undertaking traffic analysis and modelling of the proposed access points and the affected road intersections/junctions (i.e. Portrush Road/The Parade intersection and Portrush Road/High Street junction).

Evaluate the adequacy of the existing pedestrian facilities along Portrush Road and The Parade and identify any improvements required to facilitate a safe and pedestrian friendly interface with the development, particularly the interface with the proposed retail component.

Economic Impact

Guideline 7: The proposal should make a positive contribution to the commercial functions of the Norwood/Kensington Park area.

Evaluate the economic contribution of the proposal on the Norwood and Kensington precincts, taking into account the existing commercial and retail circumstances of the area.

Strategic Precinct Evaluation

Guideline 8: The proposal should be an extension of the wider Norwood/ Kensington Park precinct.

Evaluate the nature and use of the proposal in a precinct wide sense, taking into account matters of alternative site availability, the urban form and relationship to development of scale and heritage context, and relationship and proximity to the commercial precincts of The Parade environs.

Employment

Guideline 9: The proposal should enhance job creation and foster ongoing employment opportunities for the local area.

Evaluate the local and broader job creation and employment opportunities (including any multiplier effects) resulting from the proposal, from construction through to completion and operation.

6. APPENDIX 1 – SECTION 46D OF THE *DEVELOPMENT ACT 1993*

46D—DR process—Specific provisions

- (1) This section applies if a DR must be prepared for a proposed development.
- (2) The Minister will, after consultation with the proponent—
 - (a) require the proponent to prepare the DR; or
 - (b) determine that the Minister will arrange for the preparation of the DR.
- (3) The DR must be prepared in accordance with guidelines determined by the Development Assessment Commission under this Subdivision.
- (4) The DR must include a statement of—
 - (a) the expected environmental, social and economic effects of the development;
 - (b) the extent to which the expected effects of the development are consistent with the provisions of—
 - (i) any relevant Development Plan; and
 - (ii) the Planning Strategy; and
 - (iii) any matters prescribed by the regulations;
 - (c) if the development involves, or is for the purposes of, a prescribed activity of environmental significance as defined by the Environment Protection Act 1993, the extent to which the expected effects of the development are consistent with—
 - (i) the objects of the Environment Protection Act 1993; and
 - (ii) the general environmental duty under that Act; and
 - (iii) relevant environment protection policies under that Act;
 - (ca) if the development is to be undertaken within the Murray-Darling Basin, the extent to which the expected effects of the development are consistent with—
 - (i) the objects of the River Murray Act 2003; and
 - (ii) the Objectives for a Healthy River Murray under that Act; and
 - (iii) the general duty of care under that Act;
 - (cb) if the development is to be undertaken within, or is likely to have a direct impact on, the Adelaide Dolphin Sanctuary, the extent to which the expected effects of the development are consistent with—
 - (i) the objects and objectives of the Adelaide Dolphin Sanctuary Act 2005; and
 - (ii) the general duty of care under that Act;
 - (cc) if the development is to be undertaken within, or is likely to have a direct impact on, a marine park, the extent to which the expected effects of the development are consistent with—
 - (i) the prohibitions and restrictions applying within the marine park under the Marine Parks Act 2007; and
 - (ii) the general duty of care under that Act;
 - (d) the proponent's commitments to meet conditions (if any) that should be observed in order to avoid, mitigate or satisfactorily manage and control any potentially adverse effects of the development on the environment;
 - (e) other particulars in relation to the development required—
 - (i) by the regulations; or
 - (ii) by the Minister.

(5) After the DR has been prepared, the Minister—

(a) —

(i) must, if the DR relates to a development that involves, or is for the purposes of, a prescribed activity of environmental significance as defined by the Environment Protection Act 1993, refer the DR to the Environment Protection Authority;

(ia) must, if the DR relates to a development that is to be undertaken within the Murray-Darling Basin, refer the DR to the Minister for the River Murray;

(ib) must, if the DR relates to a development that is to be undertaken within, or is likely to have a direct impact on, the Adelaide Dolphin Sanctuary, refer the DR to the Minister for the Adelaide Dolphin Sanctuary;

(ic) must, if the DR relates to a development that is to be undertaken within, or is likely to have a direct impact on, a marine park, refer the DR to the Minister for Marine Parks;

(ii) must refer the DR to the relevant council (or councils), and to any prescribed authority or body; and

(iii) may refer the DR to such other authorities or bodies as the Minister thinks fit, for comment and report within the time prescribed by the regulations; and

(b) must ensure that copies of the DR are available for public inspection and purchase (during normal office hours) for at least 15 business days at a place or places determined by the Minister and, by public advertisement, give notice of the availability of copies of the DR and invite interested persons to make submissions to the Minister on the DR within the time determined by the Minister for the purposes of this paragraph.

(6) The Minister must, after the expiration of the time period that applies under subsection (5)(b), give to the proponent copies of all submissions made within time under that subsection.

(7) The proponent may then prepare a written response to—

(a) matters raised by a Minister, the Environment Protection Authority, any council or any prescribed or specified authority or body, for consideration by the proponent; and

(b) all submissions referred to the proponent under subsection (6), and provide a copy of that response to the Minister within the time prescribed by the regulations.

(8) The Minister must then prepare a report (an Assessment Report) on the matter taking into account—

(a) any submissions made under subsection (5); and

(b) the proponent's response (if any) under subsection (7); and

(c) comments provided by the Environment Protection Authority, a council or other authority or body; and

(d) other comments or matter as the Minister thinks fit.

(9) Copies of the DR, any response under subsection (7) and the Assessment Report must be kept available for inspection and purchase at a place determined by the Minister for a period determined by the Minister.

(10) If a proposed development to which a DR relates will, if the development proceeds, be situated wholly or partly within the area of a council, the Minister must give a copy of the DR, any response under subsection (7) and the Assessment Report to the council.

7. APPENDIX 2 – USEFUL DOCUMENTS

Legislation

- Development Act 1993
- Development Regulations 2008
- Environment Protection Act 1993
- Metropolitan Adelaide Road Widening Plan Act 1972
- Metropolitan Adelaide Road Widening Plan Regulations 2014

Strategy & Policy

- Norwood Payneham and St Peters (City) Development Plan Consolidated 2 July 2015
- The 30 Year Plan for Greater Adelaide: a volume of the South Australian Planning Strategy, 2010
- Environment Protection (Noise) Policy 2007
- South Australia's Waste Strategy 2015-2000, Zero Waste SA
- Building Code of Australia

Guidelines

- Guide to Design Review in South Australia, Office for Design and Architecture, 2013
- Better Practice Guide Waste Management for Residential and Mixed Use Developments, Zero Waste SA, 2014
- ESD Design Guide Office and Public Buildings Edition 3, RMIT University and Department of the Environment and Water Resources, May 2007
- Stormwater Pollution Prevention Code of Practice for the Building and Construction Industry (1999)



APPENDIX B
MPH – AMENDED PLANS



Peregrine Design Statement

The submitted design for this iconic Office development is the result of the client's passionate vision, for a state of the art facility for their organisation, which supports and encourages a healthy and sustainable workplace for staff. The final design has been cognizant of addressing its neighbours as well as the local context and public realm. The design has developed alongside commentary received from ODASA to deliver a high quality landmark building whilst responding to the principals of good design. The final design provides a landmark for the locale as well as a gateway into The Parade.

Early Design Process and Considerations

The final design has evolved through many client reviews and ODASA feedback.

Key drivers that impacted on the built form included:

- Desire to reference the historical nature of the area through the use of stone cladding but in a contemporary way to reflect modern office design
- Strengthen the interface of the two influencing street grids that define the site
- Create a "light glazed top" to the building to maximise views and daylight, and reduce scale of building
- Form to be in scale with future and current higher scaled buildings, and be iconic to reflect the dynamic nature of the owner occupier
- External deck and continuous perimeter walkway at level 03 (top of podium)
- Environmentally sustainable
- Minimise carpark impact
- improve the public realm interface of the site to Bowen Street

Council planning policy seeks the carpark and service areas to be located to the rear (Bowen Street) of the site. This configuration minimises the carpark impact to the primary road frontages. This, in addition to the site's unique configuration and broader context, informs the remaining conceptual development of the proposal.

The first scheme presented to ODASA proposed to have the main building entry off The Parade, away from the busy intersection. The built form of this earlier concept was centred around a north facing multileveled atrium that also defined the main entry. The northern facade was dominated by horizontal decks, and the remaining facades, screened with stone fins for sun control.

This concept was later discounted as there was a desire to strengthen the building form and presence to the main road intersection, reduce building mass to Bowen Street and increase articulation of the form with a base, middle and seamless top. These measures would also seek to establish an appropriate contextual relationship to the nearby heritage places.

The building entry was relocated to address the main road intersection, establishing a visual relationship with the spire of the adjacent Clayton Wesley Church. The built form of the upper floors was defined by a diagonal atrium that drew alignment reference from the unique subdivision pattern of Kensington. This atrium, and grid set out, extends through the building providing increased opportunities to provide more articulation to the Bowen Street interface.

Further refinement of the concept resulted in the use of sandstone as a primary cladding material to the building's podium. This cladding, utilised in a carefully modelled façade, provides a solid "weighting" to the building's podium and established visual scale and material relationship to the surrounding built form, and heritage context.

The contextual relationship of this visually solid podium to its urban surrounds was further strengthened through the visual "lightening" of the upper floors. This approach visually 'de-emphasises' the overall scale of the building, and provides an ephemeral quality against the skyline, and backdrop of the adjacent Clayton Wesley Church.

Further rationalisation and development of the concept scheme, as submitted for DA Approval, and following public consultation, has removed a podium floor and adjusted floor to floor heights, reducing the overall building height, at the façade ridge from 38.150m to 34.850m.

Design Philosophy

The built form reflects the history of the Peregrine Corporation with the solid podium representing the solid foundation of the organisation, and the contemporary lightweight form rising above representing the innovative and progressive direction of the organisation. The final design is one of international quality and provides a point of difference for the Peregrine brand.

The site is distinctive in character as it forms the intersection between the established wider Adelaide metropolitan north-south/east-west grid and the unique Kensington grid at 45 degrees, and verged by The Parade and Portrush Road. The design responds to the converging grids whilst formally addressing The Parade / Portrush Road corner and accommodating the potential future Parade road widening.

The built form is boldly defined visually with a solid three level podium consistent in materiality and height of the neighbouring church, a fourth floor transparent articulation level with external terraces and a layered glazed transparent three level tower above.

This defined built form reinforces the site proportions at both the macro and micro level. The podium is setback from all boundaries with an increased setback to The Parade and Portrush Road, providing a strong public landscaped amenity, circulation and entry address focus. The setback also reflects The Parade's character in urban context and public realm in respect to the emerging setback requirements of taller developments using the proposed Nuova Apartments as a reference. The height of the podium is reflective of The Parade's general streetscape and massing of the church.

The upper storeys are further set back from the podium edge to all main street frontages, with the greatest offset of 11m provided to Bowen Street and the opposing north/east projection towards The Parade and Portrush Road intersection. These setbacks significantly reduce the perceived mass of the building, and the visual shift of tower towards the intersection creates a dynamic crescendo and gateway gesture that mirrors the opposite church spire.

The podium third floor, facing Bowen Street, is setback an additional 4.5m to further reduce scale and impact on the adjacent residential properties both visually and in overshadowing. The effect is that the neighbouring properties are only overshadowed by the built form from 3pm on the autumn equinox through winter solstice's to the spring equinox.

The podium terrace incorporate a continuous landscaping planter to the façade to enhance both their, and wider community's amenity. The setbacks create a habitable deck area for use by the occupants, as well as accommodating a continuous perimeter walking track on the floor.

The built form is vertically articulated with a full height atrium that extends from The Parade and Portrush Road intersection through to the Bowen Street tower façade on the Kensington grid, providing a visual and physical link through the centre of the building. The resulting atrium defines the main entry to the building whilst addressing the site corner and context. The atrium provides natural light to the centre of the building floor plates as well as supporting ESD objectives and efficient natural ventilation. All the vertical circulation is incorporated within the central atrium which creates simple clear wayfinding for the occupants and generates visual movement through activation at each floor level.

Both the podium and tower facades are "fragmented" into planes echoing the complex site proportions and boundary corners. This fragmentation reduces perceived scale, creates defined and strategic signage locations at podium level and most significantly reinforces The Parade Portrush Road intersection and the formal north/west entry and associated central atrium space. The facades are further articulated with a dynamic geometry of 7.5 degree vertically folded facets which are a contextual reference to the adjacent church spire roof slope.

The tower's fritted glazed facade provides solar control to each level, with a dedicated zone for a continuous 'walking track' to the perimeter of each floor area, thus supporting the client's desire for walking tracks at each level for 'walking meetings' and to nurture a healthy working environment ethos.

The vision for this external treatment is to create an ephemeral top to the built form, representing the hues of the ever changing sky i.e. a white frit facade layered over blue glass vision panels reflecting the clear sky and clouds.

The cantilevered roof to the seventh floor restaurant and gym will also be of fritted glass to reduce the visual impact of this element, and together with the fritted glazed screen, will support the "lightening" of the built form and give the illusion of the building "dissolving" into the hues of the sky.

The window treatment generally comprises seamless, continuously glazed facades with uninterrupted views and access to daylight, thus providing a flexible and pleasant working environment for the contemporary office accommodation.

The podium façade treatment is designed to suit both actual and future potential office accommodation with horizontal bands of stone spandrels and opening zones. Window bands in the office areas are defined by expressed black metal trim which also extend to form sun shading devices.

The south eastern zone of the podium is set to the Bowen Street boundary alignment and responds to the functional requirements of a multilevel public car-parking. The large horizontal floor plates together with the proposed floor to floor heights will enable future alternative use adaptability. The carpark extends into a full basement to minimise the impact of the total cars parking numbers on the massing of the podium.

Where carparking occurs at upper levels the opening zone band comprises fins to create a dynamic changing visual effect as it is viewed from different angles and to allow maximum natural ventilation.

Importantly the band approach will also allow for ease of fin replacement with windows in the future if the carparking is converted to alternative accommodation. This treatment is interrupted on the Bowen Street Façade with full height stone fin sections to articulate this façade and to introduce landscaping trellis. At ground level the carpark façade also comprises full height stone fins to achieve a predominantly solid grounded form, maintain the dynamic changing visual effect and maximum natural ventilation.

In addition to this approach, the client has commenced discussions with the Norwood and St Peters Council about the opportunity create a better public realm to Bowen Street through a better traffic management strategy of parallel parking and two way access to commercial properties at the northern end of Bowen Street, extended landscaping and paving treatments. Nevertheless the current proposal will improve amenity through a continuous landscaping zone within the property boundary.

Schedule of materials, finishes and colours

The proposed building material pallet and its application has been established to support and reinforcing the architectural form and design philosophy.

The material palette comprises glass, steel, concrete and sandstone. The emphasis placed on each material varies with the built form. The podium is to be a “heavy” solid base hence requiring visually “heavy” finishes, with the “lighter” materials dominated by glass taking prominence on the upper levels.

The podium element is constructed with an external façade comprising of sandstone cladding and expressed black metal trim and sun screening, and vertical clad stone fins to the ground floor carpark. The stone is used to reference the colour and texture of the historic fabric of the area, and in particular, the adjacent church.

As the built form elevates the materials and detailing becomes lighter, with the exterior of the occupied spaces shrouded in a fritted glass facade which form an ephemeral veil to the façade diminishing the scale and mass of the upper levels. The white frit on a blue glass will imitate the sky further reducing perceived mass.

Signage

The buildings corporate signage has been provided in limited controlled locations so as to not distract from the built form. At a macro level the “Peregrine” building identification is located for various distant views. Closer to site tenant signage is located for ease of identification at road level and adjacent the main entry. The Peregrine corporate identity will be in the form of applied signage to each cantilevered fritted glass screen, and be subtly lit as to not detract from the screens. The main entry sign will be located on the glass atrium.

Finally there will be a wayfinding signage overlay developed for the building and site, this will be sympathetic to the architecture whilst providing a legible method of navigating the building internally and externally.

Crime Prevention Through Environmental Design

Principles of Crime Prevention through Environmental Design (CPTED) have been integrated into the design of the Building.

The building's main entrance, located at the busy intersection of The Parade and Portrush Road, will be identifiable and secure. Clear signage will distinguish the different uses within the building (café, retail, office, restaurant, private gym etc) which will be accessible from the ground level reception area.

Street level legibility enables a clear sense of address for the retail and other tenancies in the building and is promoted through clear design of entry points, stairwells, lifts and exit points and will be supplemented with appropriate signage.

External lighting of the building will be multifaceted and integrated, ensuring a safe and well-lit environment for all areas of the building and perimeter, including the colonnades along Portrush Road, High Street and the Parade.

Passive surveillance over public areas is provided through the location of highly trafficked land uses with extended hours of operation such as cafes and retail fronting onto and overlooking ground level public spaces. Visibility is high when coupled with the extensive use of glazing at ground level. This is further strengthened with the open fin design to the perimeter of the carpark providing two-way passive surveillance to the carpark and the building exterior.

Decks from upper levels of the building will provide opportunities for elevated casual surveillance over Bowen Street and High Street.

The building has been designed to avoid areas that could provide for potential entrapment. Blind corners and dead ends have been avoided and clear lines of sight are provided. Pedestrian routes are typically straight and have good lines of sight. Pedestrian amenity in the public realm is enhanced through a generous footpath width, additional street tree planting, associated ground level landscaping, bollard lighting and the retention of street lighting.

Landscaping will be selected not only for its sustainable growing properties and green impact but also for CPTED properties and thus clean trunked trees and low scale vegetation prevail over bushes and shrubs that of themselves can provide opportunities for concealment.

CCTV surveillance will be used internally and externally around the perimeter and car parking areas. Whilst CCTV is not a fail-safe mechanism to avoid crime, in conjunction with those other mechanisms, it is a clear deterrent.



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Peregrine Head Office Development Site Plan

1465 07/02/2017 scale1 : 2500 @ A3 SK00 (8)

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**Peregrine Head Office Development
 Basement Plan**

1465 07/02/2017 scale 1 : 500 @ A3 SK09 (14)

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The Parade

The Parade

Portrush Road

Bowen Street

High Street

Residential

Warehouses

State Heritage Place

The Arena Community Club

Possible Future Tram / Road widening - 4500mm offset

Waste 165sqm

Loading area (3 spaces)

Cafe / Retail 380sqm

Lobby 300sqm

Recep.

Entry

Entry

Cafe / Retail 680sqm

DN

DN

2700sqm
60 Car parks
Total Car parks 223
M/Bikes 12

Vehicle Entry/Exit

Service Vehicle and FOT Entry

Loading Zone

One-way Road

One-way Road

Vehicle Entry/Exit

A B

C

A B

C



0 5 25m



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Peregrine Head Office Development
Ground Floor

1465 07/02/2017 scale 1 : 500 @ A3 SK01 (12)

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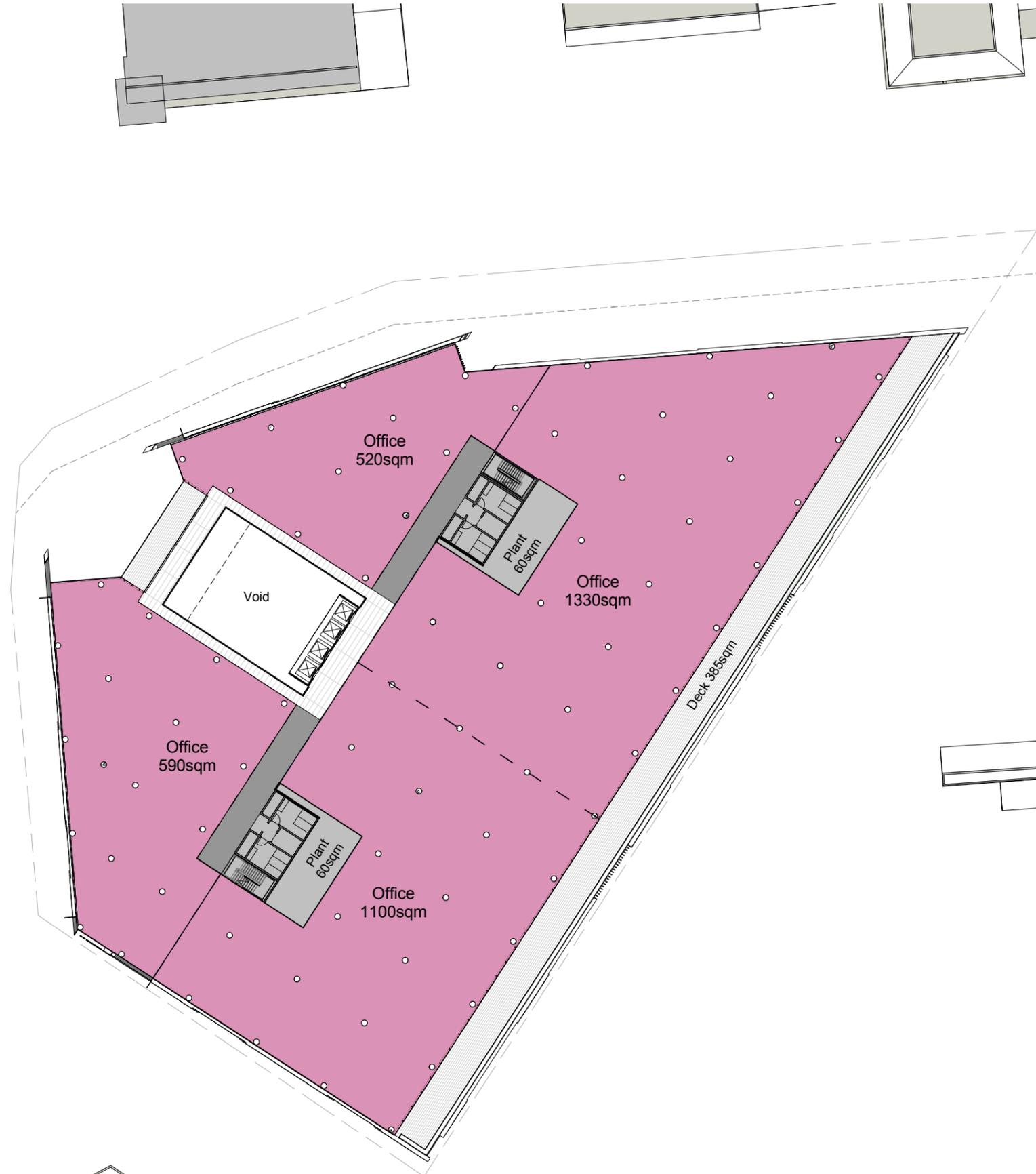


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**Peregrine Head Office Development
 Level 1**

1465 07/02/2017 scale 1 : 500 @ A3 SK02 (12)

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0 5 25m

**Peregrine Head Office Development
 Level 2**

1465 07/02/2017 scale 1 : 500 @ A3 SK03 (11)

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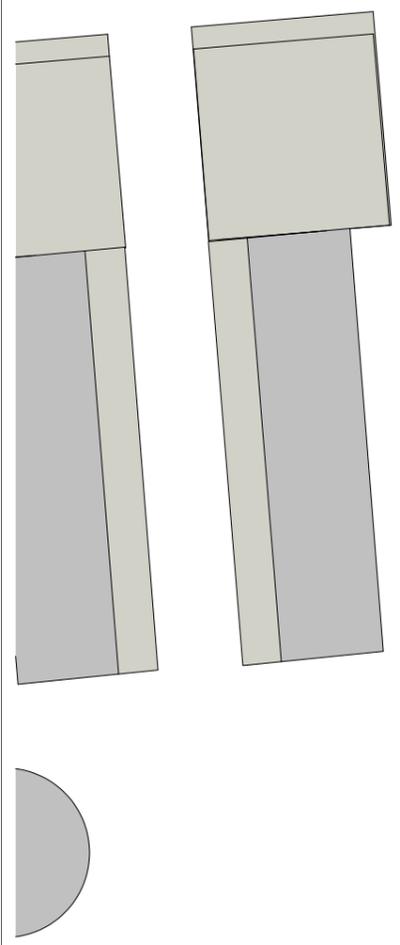
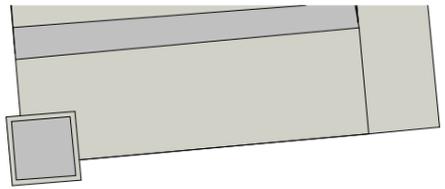
5 Vardon Avenue Adelaide South Australia 5000 | Telephone 08 8418
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**Peregrine Head Office Development
 Level 3**

1465 07/02/2017 scale 1 : 500 @ A3 SK04 (11)

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Deck
140sqm

Meeting

Void

Plant
60sqm

Meeting

Void

Total
1900sqm
Office

OTR Operations + HR 684sqm
Food Operations + HR 336sqm
Corporate HR 72sqm
Property 120sqm
IT 528sqm
IT Server 150sqm
Total 1890sqm

Plant
60sqm

Meeting



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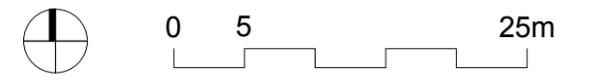
**Peregrine Head Office Development
Level 4**

1465 07/02/2017 scale 1 : 500 @ A3 SK05 (11)

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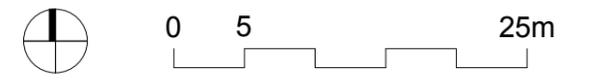
**Peregrine Head Office Development
 Level 5**

1465 07/02/2017 scale 1 : 500 @ A3 SK06 (11)

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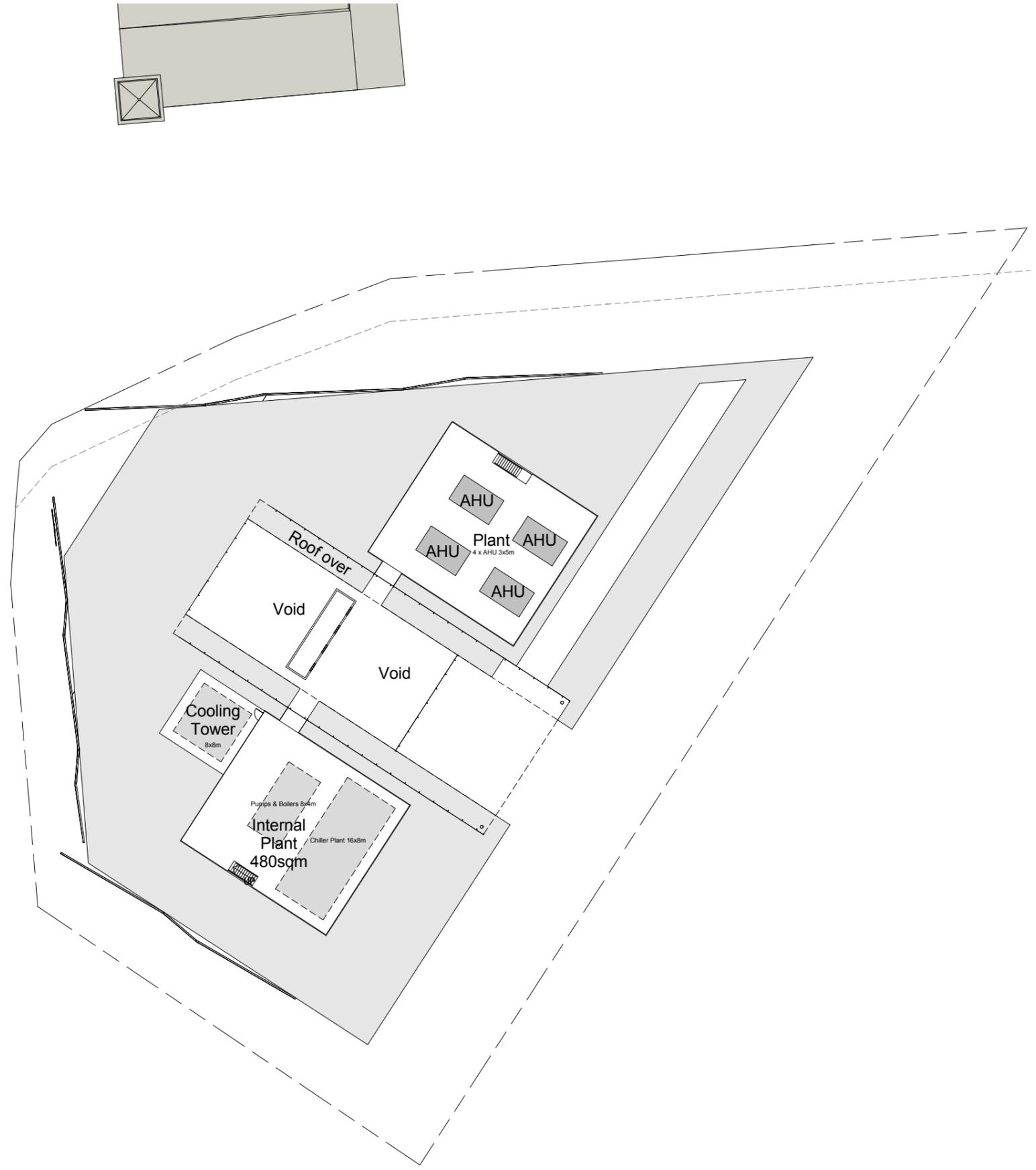
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**Peregrine Head Office Development
 Level 6**

1465 07/02/2017 scale 1 : 500 @ A3 SK07 (12)

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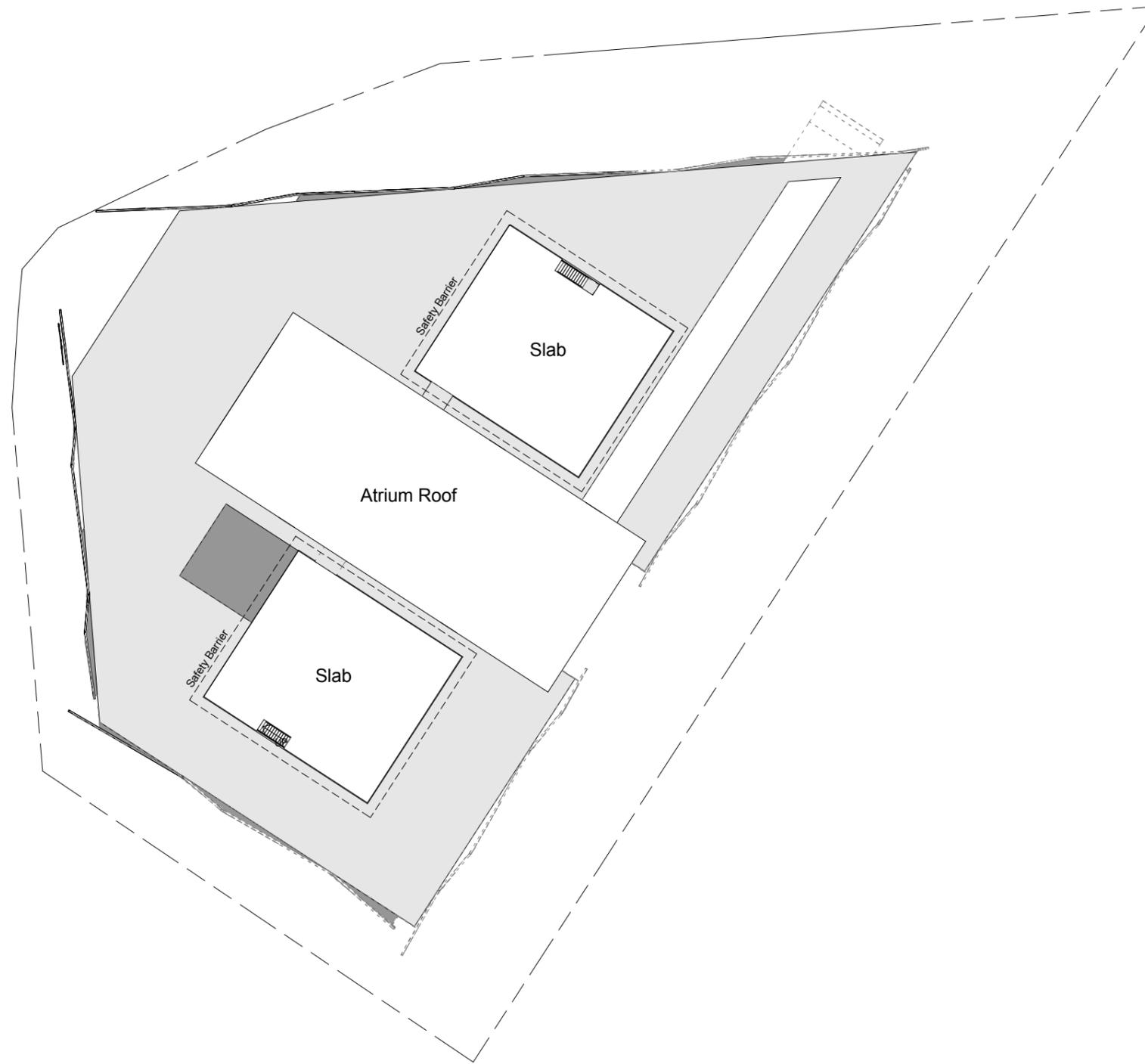
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**Peregrine Head Office Development
 Roof Plan**

1465 07/02/2017 scale 1 : 500 @ A3 SK08 (9)

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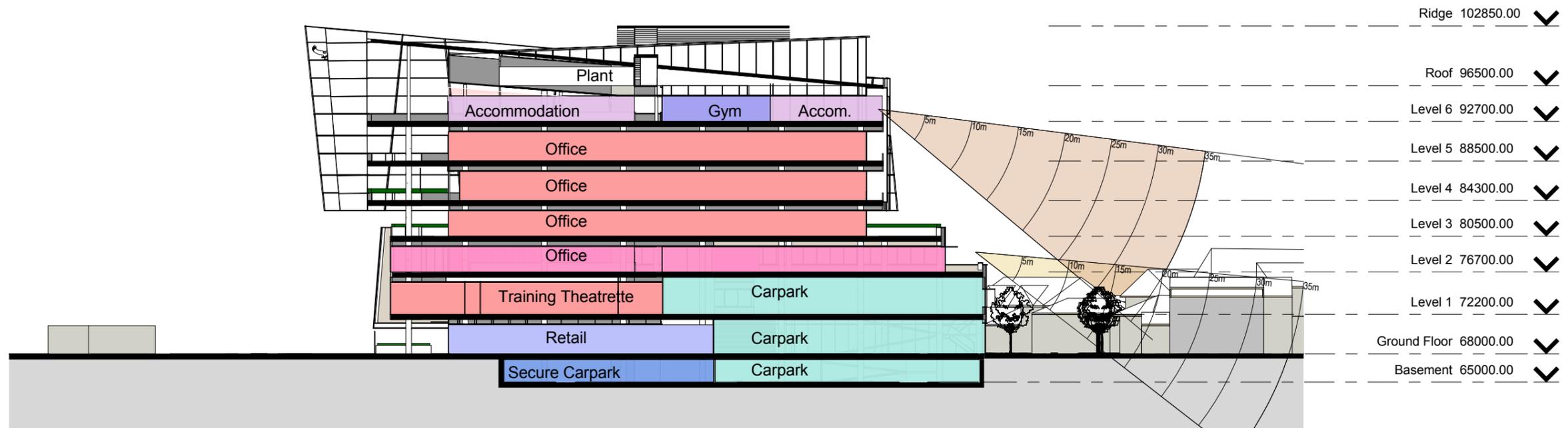


0 5 25m

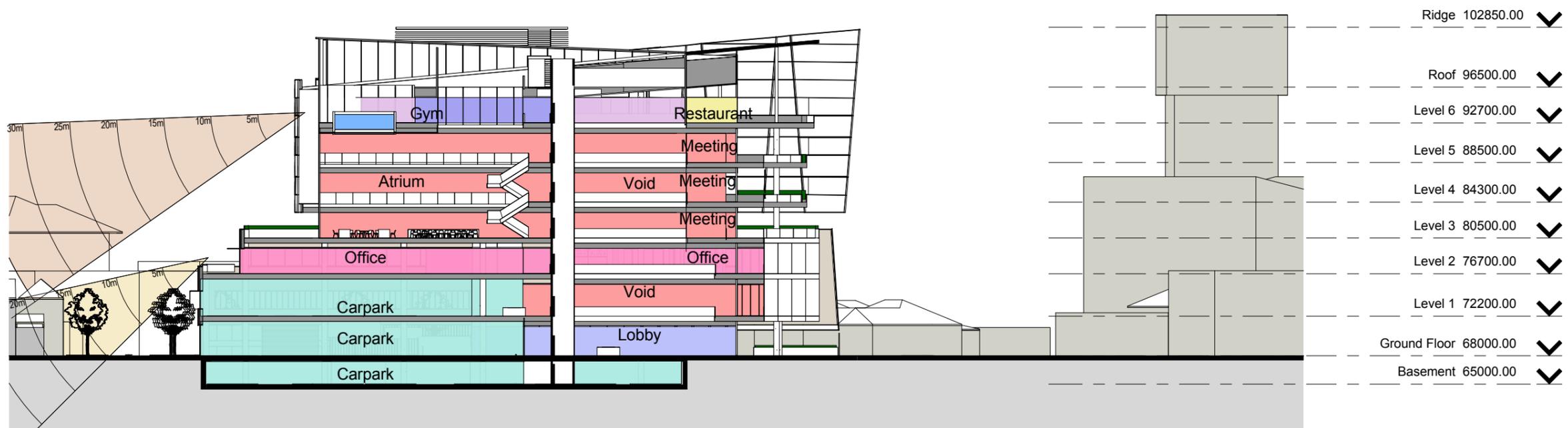
**Peregrine Head Office Development
Roof Plan**

1465 07/02/2017 scale 1 : 500 @ A3 SK55 (8)

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Section A
1 : 500



Section B
1 : 500



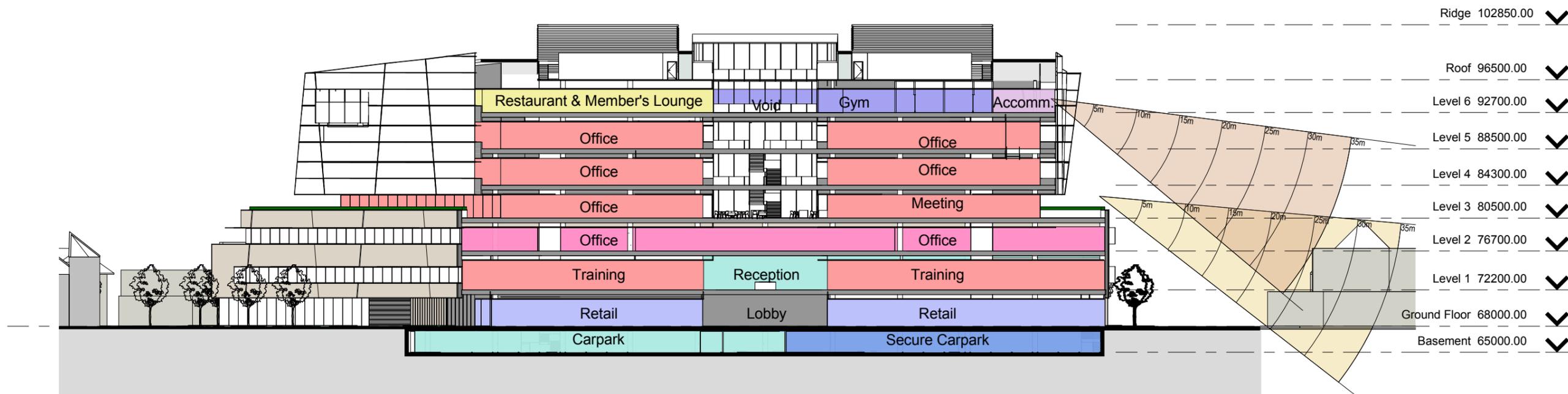
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Peregrine Head Office Development
Sections

1465 07/02/2017 scale 1 : 500 @ A3 SK35 (8)

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Section C
1 : 500



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Peregrine Head Office Development
Sections

1465 07/02/2017 scale 1 : 500 @ A3 SK53 (6)

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Cantilevered glazed swimming pool penetrating through facade

Fritted Glass screens cantilevered from main building face

Sandstone clad podium facade

Black metal panels with low level planter



Fritted Glass screens

Black steel surround to podium facade

Black metal expressed surrounds / sun shading to podium openings

Black metal reveal with signage opportunity integrated with podium surround

Glazed curtain wall to atrium

Glazed facade to ground floor retail / cafe setback from Podium facade to form negative

Black metal reveal in Podium facade with signage opportunity

Ridge 102850.00

Roof 96500.00

Level 6 92700.00

Level 5 88500.00

Level 4 84300.00

Level 3 80500.00

Level 2 76700.00

Level 1 72200.00

Ground Floor 68000.00

North Elevation - The Parade

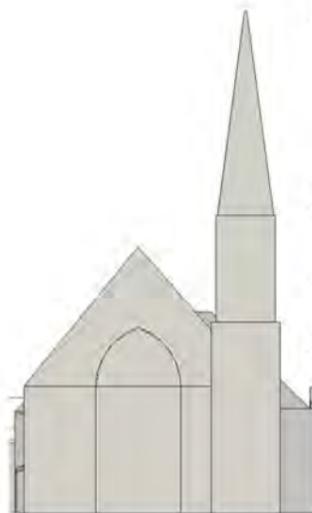
1 : 500

Cantilevered glazed swimming pool penetrating through facade

Fritted Glass screens cantilevered from main building face

Glazed curtain wall to atrium

Sandstone clad podium facade with Black metal surround



Fritted Glass screens cantilevered from main building face

Landscaped 'cap' to podium

Sandstone clad podium facade

Vertical sandstone coloured stone fins to carpark extent

Ridge 102850.00

Roof 96500.00

Level 6 92700.00

Level 5 88500.00

Level 4 84300.00

Level 3 80500.00

Level 2 76700.00

Level 1 72200.00

Ground Floor 68000.00

West Elevation - Portrush Rd

1 : 500

Black metal expressed surrounds / sun shading to podium openings

Continuous glazed facade

Glazed facade to ground floor retail / cafe setback from Podium facade to form negative



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Peregrine Head Office Development Elevations

1465 07/02/2017 scale 1 : 500 @ A3 SK36 (8)

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Bowen St Elevation

1 : 500

Glazing to Office accommodation

Black metal panels in front of waste area

Vertical sandstone coloured stone fins to carpark extent



High Street Elevation

1 : 500



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Peregrine Head Office Development Elevations

1465 07/02/2017 scale 1 : 500 @ A3 SK54 (5)

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ARTIST IMPRESSION

**Peregrine Head Office Development
3D Overview**

1465 07/02/2017 scale @ A3 SK21 (10)

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ARTIST IMPRESSION

Peregrine Head Office Development
South East view from The Parade

1465 07/02/2017 scale @ A3 SK25 (10)

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ARTIST IMPRESSION

**Peregrine Head Office Development
Parade looking West**

1465 07/02/2017 scale @ A3 SK24 (10)

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ARTIST IMPRESSION

**Peregrine Head Office Development
Portrush looking North**

1465 07/02/2017 scale @ A3 SK27 (9)

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ARTIST IMPRESSION
Peregrine Head Office Development
Parade looking East

1465 07/02/2017 scale @ A3 SK47 (8)

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ARTIST IMPRESSION

**Peregrine Head Office Development
Portrush looking South**

1465 07/02/2017 scale @ A3 SK48 (8)

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ARTIST IMPRESSION

**Peregrine Head Office Development
High St looking West**

1465 07/02/2017 scale @ A3 SK49 (8)

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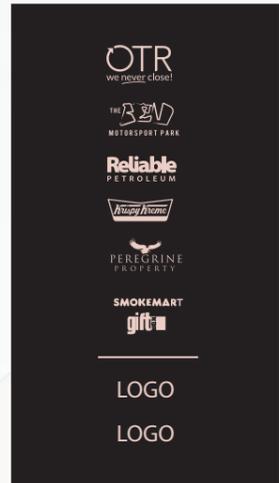
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Peregrine Head Office Development
Parade looking East

1465 07/02/2017 scale @ A3 SK58 (2)

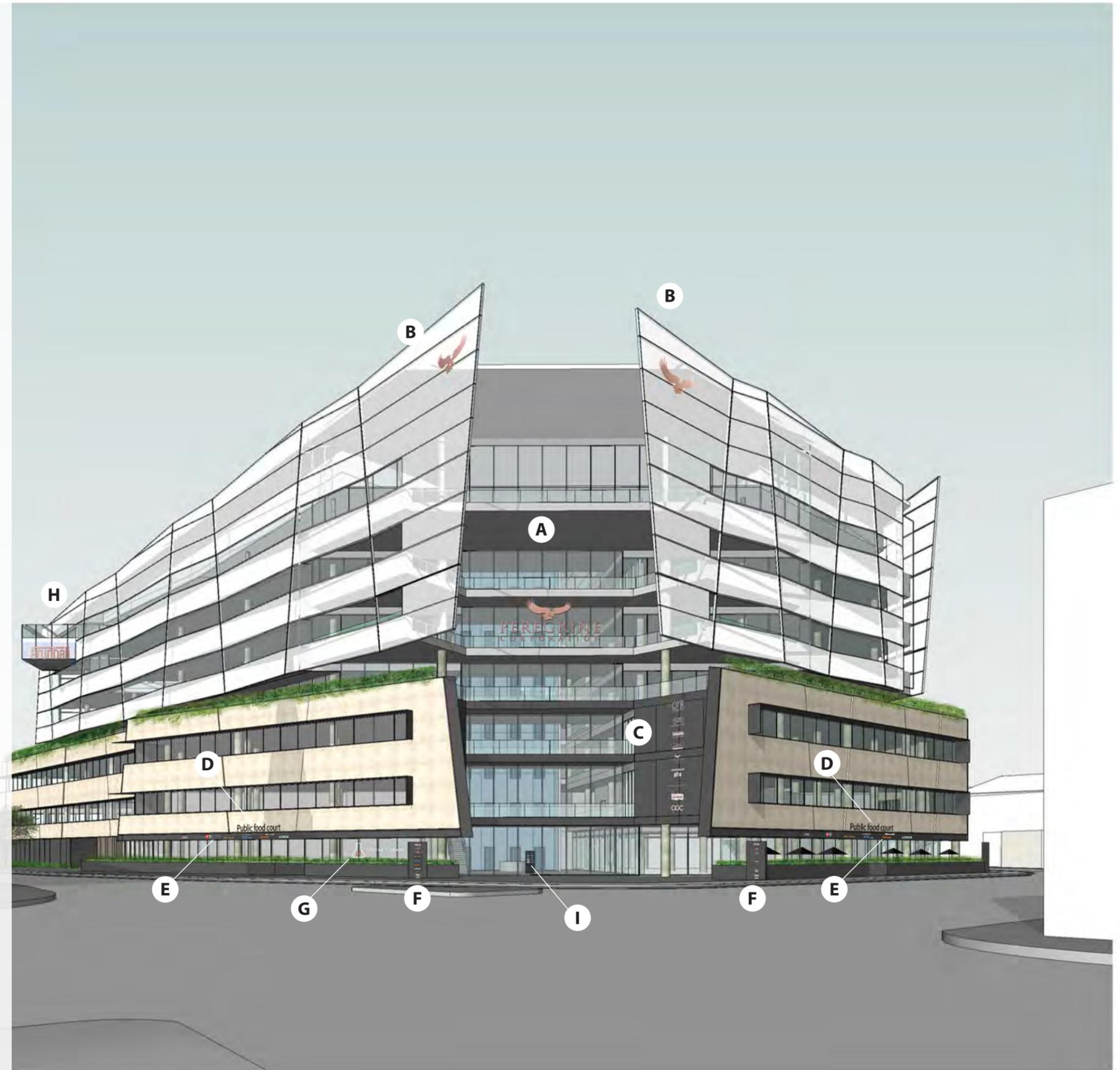
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- A** Peregrine Corporation
Stainless steel sign with copper effect - 7500 x 3500mm
- B** Peregrine mark
Stainless steel sign with copper effect - 7500 x 3500
- C** All signs stainless steel sign with copper effect



- C1** OTR logo- 1700 x 1000mm
- C2** The Bend Motorsport Park logo- 1800 x 900mm
- C3** Reliable Petroleum logo- 1800 x 670mm
- C4** Krispy Kreme logo- 1700 x 600mm
- C5** Peregrine Property logo - 1800 x 870mm
- C6** Smokemart Giftbox logo - 1800 x 900
- C7** External tenant logo 1 - 1500 x 600
- C8** External tenant logo 2 - 1500 x 600

- D** Food court signage x 2
Dark steel finish with back illumination onto stone - 500 x 5000
- E** Eave food court offer signage x 2 sets
Back illuminated through dark steel strip
Each logo max 1600 x 500
- F** Pedestrian food court sign x 2
Dark steel with uplight 1000 x 2500
- G** Cafe window graphics
Lasercut acrylic mounted on window 4000 x 1200
- H** Restaurant signage
Edge-lit Stainless steel sign with copper effect - 4000 x 1400mm
- I** Foyer pylon
(Inside foyer)



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ARTIST IMPRESSION
 Peregrine Head Office Development
 South East view from The Parade

1465 07/02/2017 scale @ A3 SK25 (10)
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J Peregrine mark
Stainless steel sign with copper effect - 7500 x 3500

K All signs stainless steel sign with copper effect



K1 Peregrine Corporation logo- 2100 x 900mm

K2 OTR logo- 1300 x 800mm

K3 The Bend Motorsport Park logo- 1300 x 670mm

K4 Reliable Petroleum logo- 1300 x 570mm

K5 Krispy Kreme logo- 1300 x 500mm

K6 Peregrine Property logo - 1400 x 670mm

K7 Smokemart Giftbox logo - 1400 x 700

K8 External tenant logo 1 - 1200 x 500

K9 External tenant logo 2 - 1200 x 500



L All signs stainless steel sign with copper effect



- L1** Peregrine Corporation logo- 2100 x 900mm
- L2** OTR logo- 1300 x 800mm
- L3** The Bend Motosport Park logo- 1300 x 670mm
- L4** Reliable Petroleum logo- 1300 x 570mm
- L5** Krispy Kreme logo- 1300 x 500mm
- L6** Peregrine Property logo - 1400 x 670mm
- L7** Smokemart Giftbox logo - 1400 x 700
- L8** External tenant logo 1 - 1200 x 500
- L9** External tenant logo 2 - 1200 x 500



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ARTIST IMPRESSION

**Peregrine Head Office Development
 Portrush looking North**

1465 07/02/2017 scale @ A3 SK27 (9)

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- M** Peregrine Corporation sign
Stainless steel sign with copper effect - 6000 x 3000mm
- N** Car Park signage
Dark steel finish with back illumination onto stone - 500 x 2600
- O** Car Park Details
Non-illuminated lettering mounted onto black metal - 1500 x 800
- P** Bowen Street Details x 2
Non-illuminated lettering mounted onto black metal - 1500 x 800



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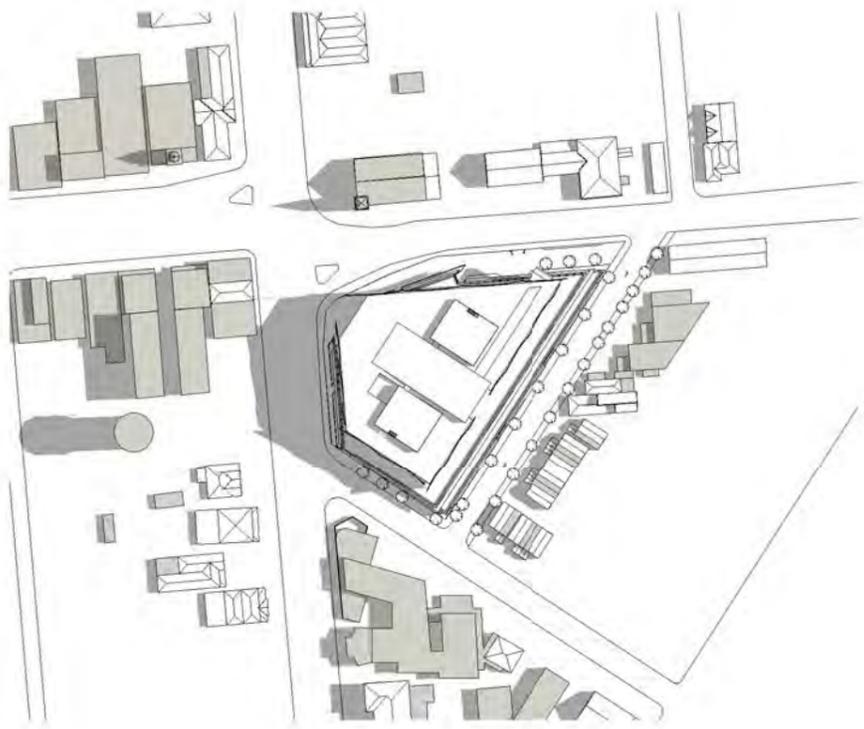
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ARTIST IMPRESSION

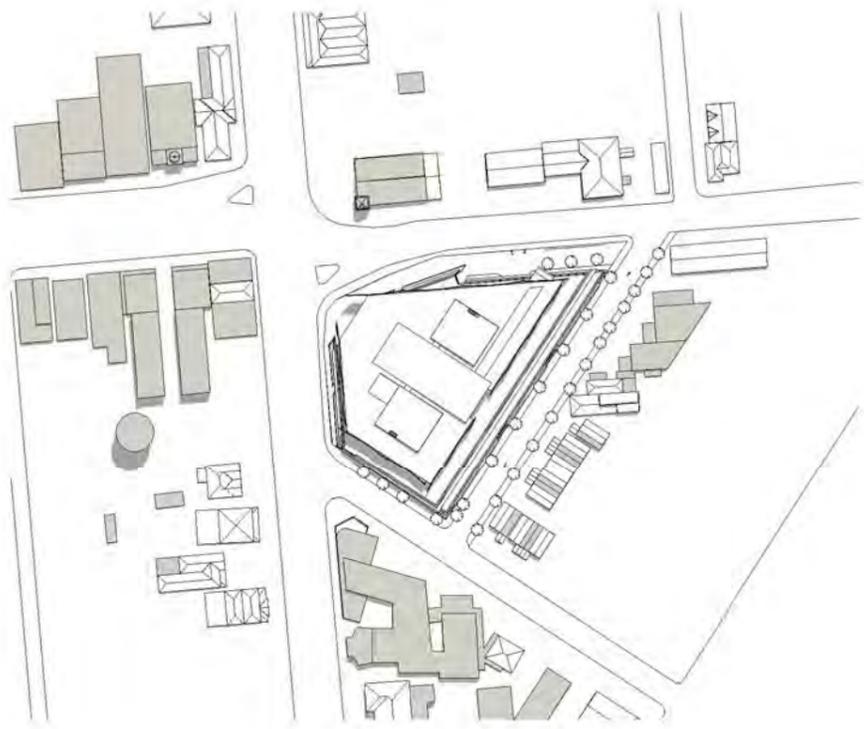
**Peregrine Head Office Development
High St looking West**

1465 07/02/2017 scale @ A3 SK49 (8)

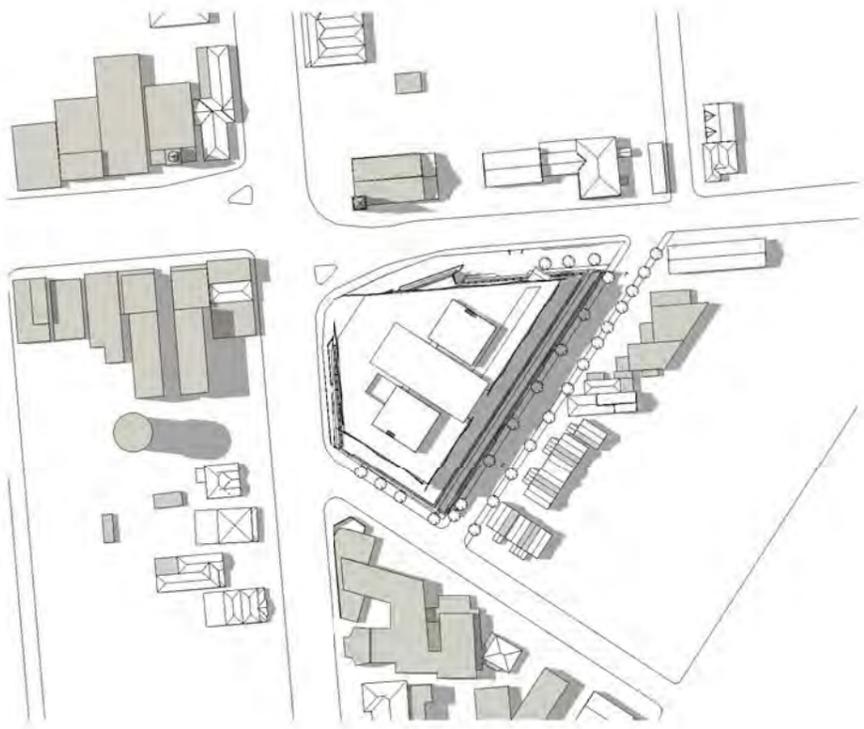
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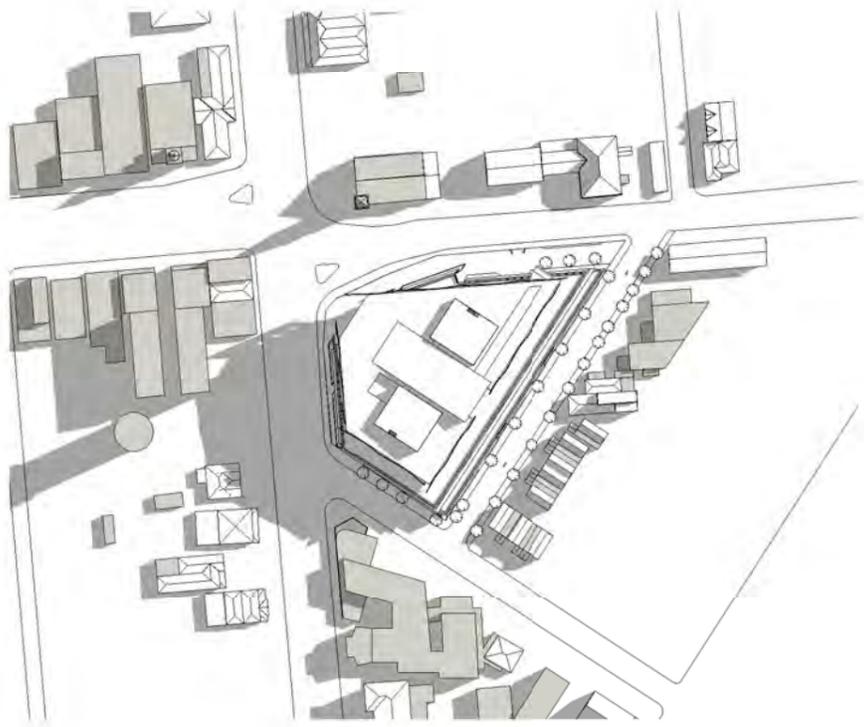
Summer Solstice 9am
1 : 2500



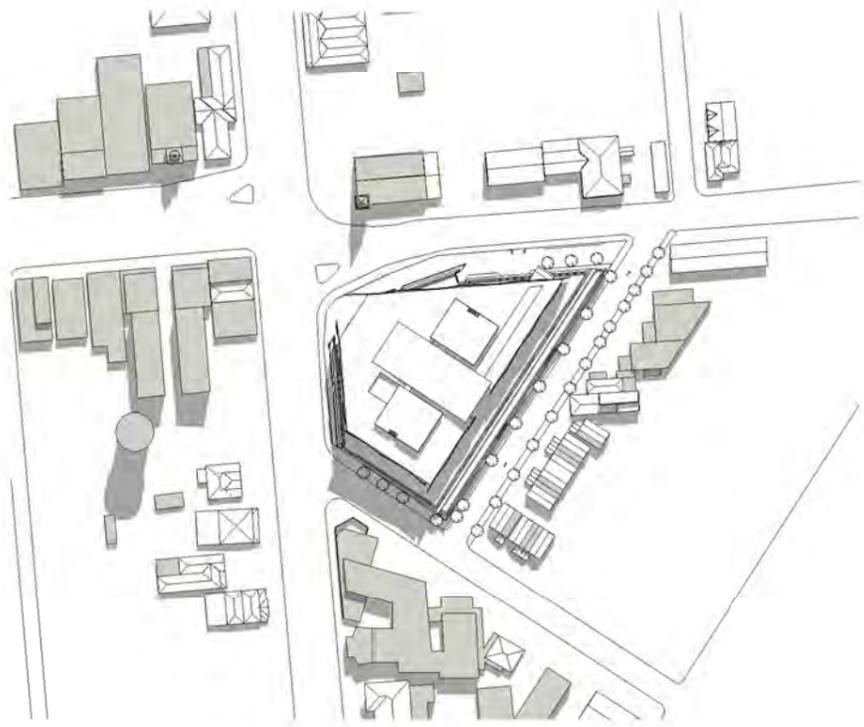
Summer Solstice 12 noon
1 : 2500



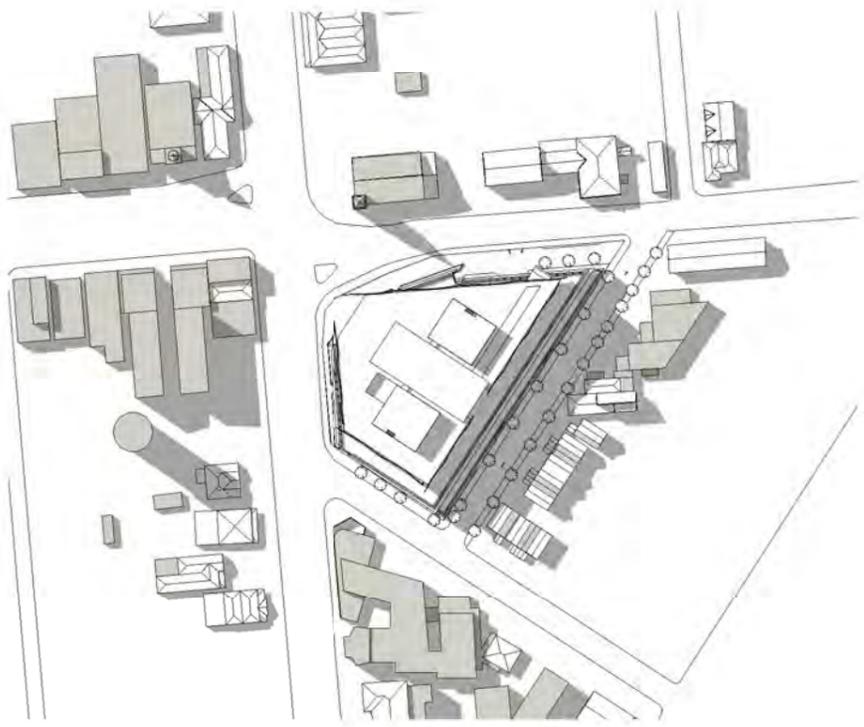
Summer Solstice 3pm
1 : 2500



Autumn Equinox 9am
1 : 2500



Autumn Equinox 12 noon
1 : 2500



Autumn Equinox 3pm
1 : 2500



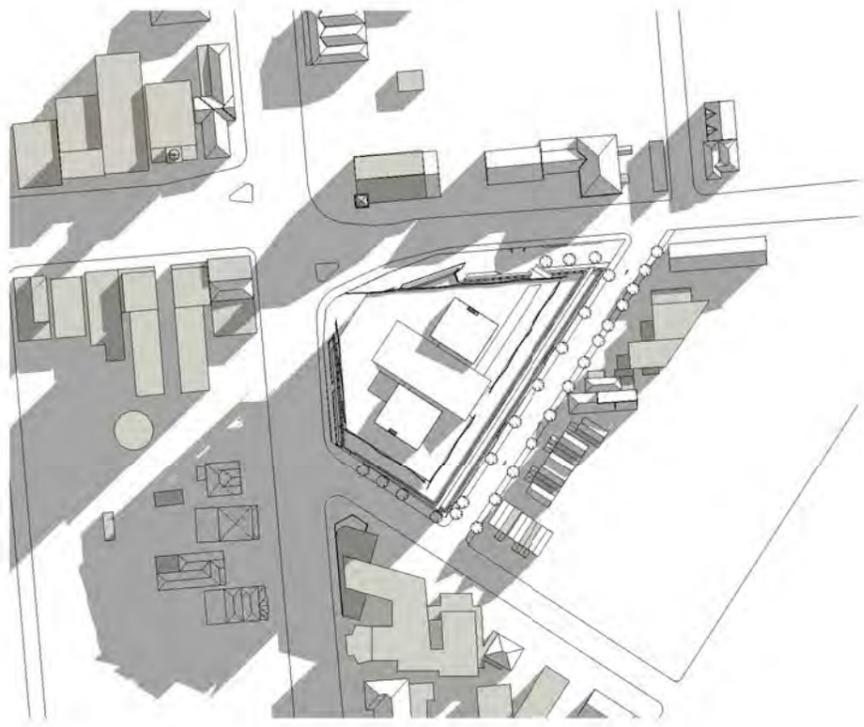
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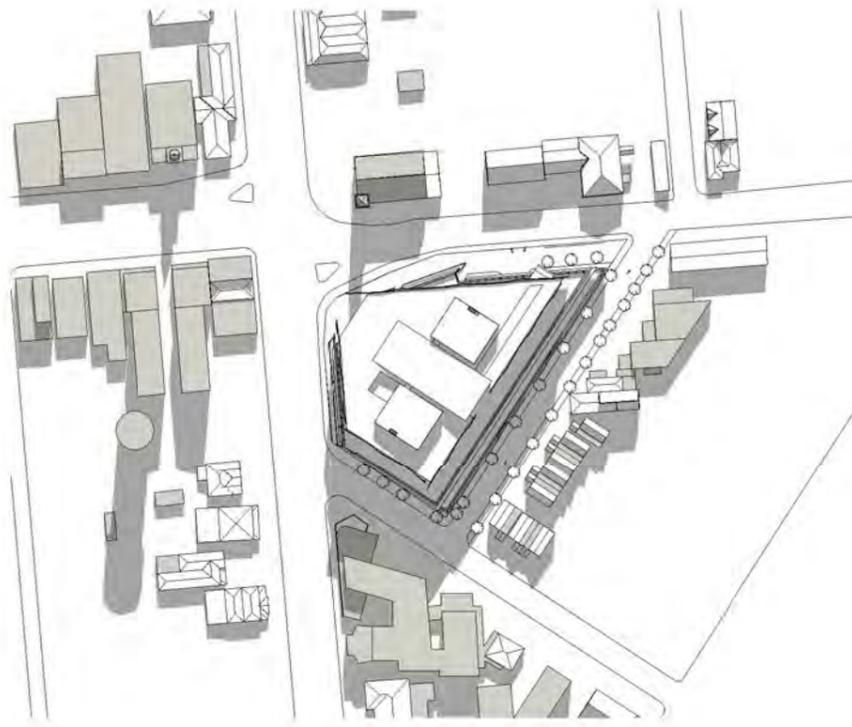
**Peregrine Head Office Development
Solar Diagrams**

1465 07/02/2017 scale 1 : 2500 @ A3 SK40 (8)

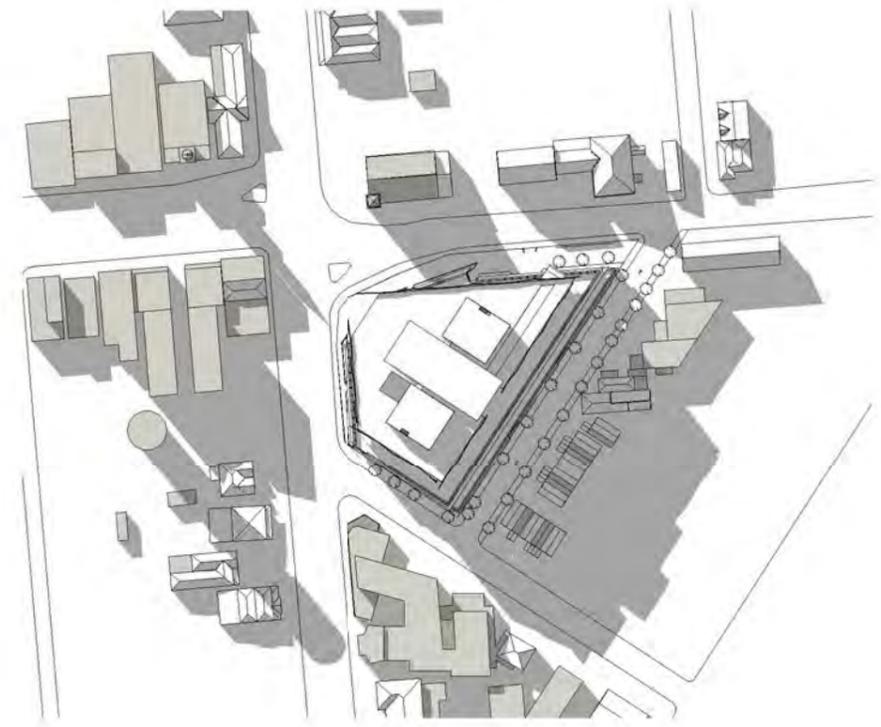
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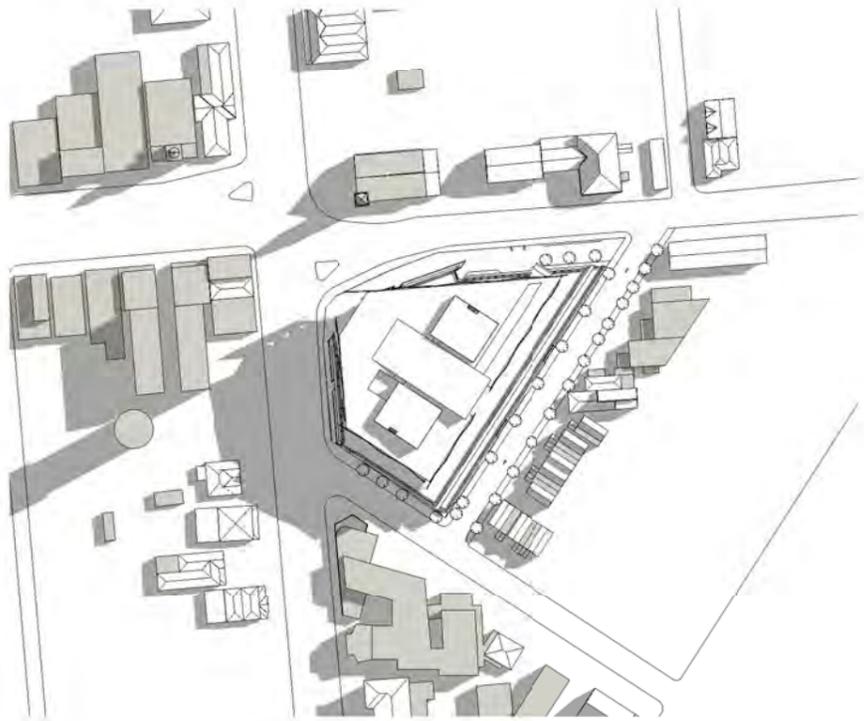
Winter Solstice 9am
1 : 2500



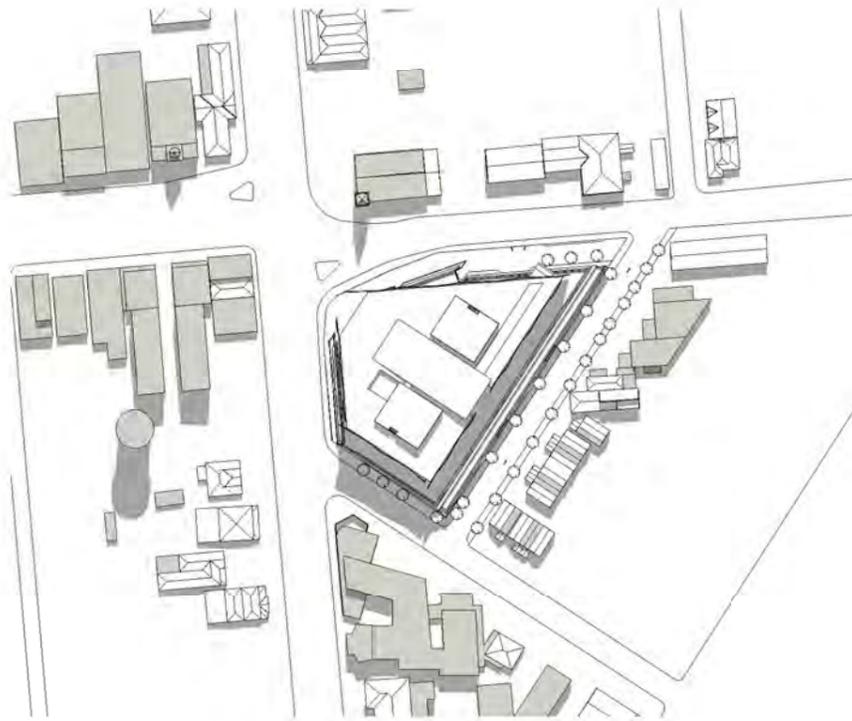
Winter Solstice 12 noon
1 : 2500



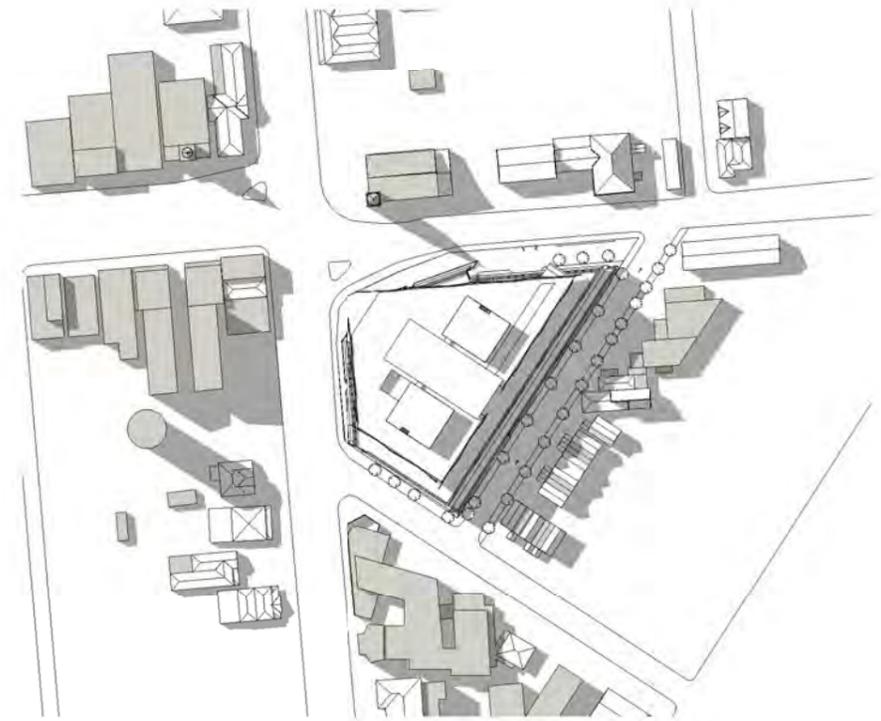
Winter Solstice 3pm
1 : 2500



Spring Equinox 9am
1 : 2500



Spring Equinox 12 noon
1 : 2500



Spring Equinox 3pm
1 : 2500



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**Peregrine Head Office Development
Solar Diagrams**

1465 07/02/2017 scale1 : 2500 @ A3 SK52 (6)

Whilst every effort has been made to capture all relevant details on these plans, it is acknowledged that these plans are for planning purposes only and may not contain complete information pertaining to the development. All relevant and necessary details will be documented in the detailed design and plans submitted for Building Rules Consent.

The Parade

The Parade

Portrush Road

High Street

Bowen Street

Warehouses

Residential

State Heritage Place

The Arena Community Club

Possible Future Tram / Road widening - 4500mm offset

3 spaces

Waste 165sqm

Loading area (3 spaces)

Cafe / Retail 380sqm

Lobby 300sqm

Recep.

Entry

UP

UP

Collection Point

Service Vehicle and FOT Entry

one way / two way junction

Entry

Cafe / Retail 680sqm

DN

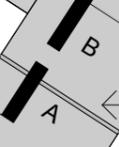
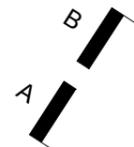
DN

Vehicle Entry/Exit

One-way Road

Vehicle Entry/Exit

2700sqm
60 Car parks
Total Car parks 223
M/Bikes 12



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Peregrine Head Office Development
Future Urban Vision

1465 07/02/2017 scale 1 : 500 @ A3 SK57 (6)

Whilst every effort has been made to capture all relevant details on these plans, it is acknowledged that these plans are for planning purposes only and may not contain complete information pertaining to the development. All relevant and necessary details will be documented in the detailed design and plans submitted for Building Rules Consent.



Typical images of Sandstone facade treatments to podium level, the sandstone will be offset by the expressed blackened steel reveals



Typical images of expressed steel reveals to windows, all openings to the podium level will be expressed using blackened steel window reveals.



Typical images of white frit on light blue glazed facade to upper levels of development



Typical images of sandstone coloured expressed fins, this image represents the approach to the carparking screens using sandstone fins



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1465 Peregrine Head Office Development
Finishes / Materials Images

05.05.2016 scale @ A3 SK47



APPENDIX C
GOVERNMENT AGENCY AND COUNCIL SUBMISSIONS

File Number: S.04198
Enquiries To: Carlos Buzzetti
Direct Telephone: 8366 4501



City of
Norwood
Payneham
& St Peters

26 October 2016

Ms Laura Kerber
Senior Planning Officer
Strategic Development Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

Dear Laura

Peregrine Mixed Use Development Proposal – 270 The Parade, Kensington

The Council considered the above-mentioned Development Application at a Special Council meeting held on Tuesday 25 October 2016.

Pursuant to Section 46D(5)(a) of the *Development Act 1993* and Section 63E(b) of the *Development Regulations 2008*, I offer the following comments on behalf of the City of Norwood Payneham & St Peters.

Land Use

The property at 270 The Parade, Kensington, is located within the Business Zone. The zone policies anticipate Office and/or Consulting Room development with a gross leasable area not exceeding 250 square metres per individual building, except in the West Norwood Policy Area, where the gross leasable area should not exceed 500 square metres per individual building.

The scale of the proposed office use is therefore significantly greater than that which is envisaged within the Kensington Policy Area of the Business Zone.

The Council's Development Plan designates opportunities for large scale commercial buildings to be located in more strategic locations, such as within the Boulevard and Business Policy Areas of the Urban Corridor Zone in Kent Town, where the close proximity to the CBD, business co-location benefits and minimal residential interface can be respectively achieved and managed.

The subject land represents the complete extent of the Business Zone in Kensington. The 'spot zoning' of the subject land is likely to have resulted from the recognition of the long-standing use of the land for office and related purposes. As such, the policy allows for the on-going use and re-use of the subject land for commercial purposes, however in doing so, the policies recognise the adjacency of the subject land to residential development to the south-east and contemplates commercial development of a scale which is reasonably compatible with that immediately adjacent residential interface.

By contrast, alternative areas of the City which are zoned for larger scale commercial and mixed use buildings of the scale proposed, are strategically located such that impacts related to traffic, character, shadowing, noise etc, can be carefully managed and adequately addressed.

Accordingly, the Council questions whether the subject land is appropriate for the establishment of commercial uses of the scale and intensity that is proposed.

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Sustainability

Heritage

It is understood that the Application has been referred to the State Heritage Unit of the Department for Environment, Water and Natural Resources, regarding the impact of the proposal on the adjacent State Heritage Places, in parallel with the public notification process. In lieu of any such expert advice being currently available, the following is noted.

The subject land is located directly adjacent to four (4) State Heritage Places, comprising:

1. the former Norwood Wesleyan Methodist Church, Hall and Front Fence, 239 The Parade, Norwood;
2. two Storey Shops and Upstairs Dwellings, 258 – 262 The Parade, Norwood;
3. Clayton Wesley Uniting Church complex, including 1882 Church, 1856 Chapel, 1875 Hope Hall and 1910 Clayton Institute, 278 Portrush Road, Beulah Park; and
4. Benson Memorial Drinking Fountain, corner of Portrush Road and High Street, Kensington.

The Development Plan recognises the importance of the State Heritage Places to the character of the intersection of The Parade and Portrush Road, stating:

“The corner of The Parade and Portrush Road is a visually prominent site within the city and any new building should be of massing and configuration which visually reinforces the corner, whilst respecting the scale of buildings in the adjacent Historic (Conservation) Zones and maintaining the prominence of the State Heritage listed buildings on the south-western, north-eastern and north-western corners of the intersection of Portrush Road and The Parade.”

The Council considers that the massing and configuration of the proposed building does not maintain or respect the prominence of the adjacent State Heritage listed buildings. Those buildings are currently highly visually prominent elements, with the spires of the Wesleyan Methodist Church and the Clayton Wesley Uniting Church being particularly notable landmarks within the local area; defining the character of the intersection to a large extent.

The Architects for the proposal, MPH, have stated that part of their ambition in the design, was to provide a “*landmark for the locale*”. The creation of a new landmark building, with a scale that is significantly larger than the adjacent heritage buildings, will inevitably reduce the prominence and importance of those heritage buildings within the landscape.

The report by DASH, which has been provided by the Applicant in support of the Application, attempts to justify the impact of the proposal on the adjacent State Heritage Places in the following ways:

1. by referencing a recent approval for a 2-5 storey building at 258-256 The Parade, as demonstration of a clear acceptance of increased bulk and scale in the locality;
2. by stating that bold, strong, high quality architecture is often improved through the introduction of new similarly bold buildings, rather than submissive buildings; and
3. by noting that the setting and context of historic buildings often changes over time.

The rationale of the first justification is difficult to understand. The fact that another body accepted an increase in building scale in the broader locality, should not influence an opinion from a heritage expert, on the impacts of the development proposal, on the heritage value of the adjacent heritage listed buildings. In any event, the development which was recently approved by the Inner Metropolitan Development Assessment Commission (IMDAC) at 258-256 The Parade, presents to The Parade in two storey form, matching the height of the adjacent State Heritage Place at the street, with the five storey portion set well back, such that it will not compete with the State Heritage Place for prominence within the streetscape. As such, the situations and context are not comparable.

In relation to the second justification given by DASH, it is accepted that a building located adjacent to a heritage building should be bold and of high quality. This is reflected in the Desired Character Statement for the Kensington Policy Area of the Business Zone, which states that any new building should be of massing and configuration which visually reinforces the corner. However, the proposed building is not ‘similarly bold’ when compared to the adjacent State Heritage Places, as it is much larger in its overall scale.

Despite having a height which is akin to that of the spire element of the church at 278 Portrush Road, the scale of the two buildings is vastly different. The external wall height of the church building is akin to a typical 2-3 storey building, whereas the height of the proposed building is akin to a typical nine (9) storey building. The footprint of the church building is approximately 450m² whereas the proposed building has a footprint of 4,225m².

In relation to the third justification given by DASH, it is acknowledged that new development can be successfully integrated into a locality adjacent to heritage properties, without adversely affecting the heritage significance of an adjacent heritage property. The concept that a larger building can be located adjacent to a smaller heritage listed building, without adversely affecting the heritage value of the heritage listed building, was explored by the Environment Resources and Development Court in the case of *Bond v City of Norwood Payneham & St Peters* [2007] SAERDC 56, which was an appeal against a refusal by the Council of an application for a very tall two-storey building directly adjacent to a single storey Local Heritage Place cottage in a Mixed Use Zone.

In that case, the Commissioner stated:

"Will the greater height of the subject proposal impair the heritage value of the Local Heritage Place? 36-38 King Street, described in the Council's Heritage survey, undertaken in 1994, as a building which "contributes significantly to the older character and streetscape of King Street" is now isolated, such that its heritage value, consistent with the evidence Mr Harry, is confined to the building's design, materials, and close relationship with the street frontage. The proposal's additional height is, in my view, acceptable in a locality characterized by a mix of one and two-storey buildings, and will, in any event, not have any adverse effect on the remaining heritage value of the adjoining Local Heritage Place.....Were the latter to form part of a "run" of Local Heritage Places, such that they made a collective contribution to the character of King Street, my conclusion might well have been different, but in all the circumstances, I am satisfied that the subject proposal would be compatible with, and complementary to, the Local Heritage Place at 36-38 King Street, and that those provisions of the Development Plan relevant to assessment of development adjoining a Local Heritage Place, including Council Wide Objective 83 and Principle 168 are satisfied."

In the case of the current proposal, the adjacent State Heritage Places do in fact form part of a collection of State Heritage Places, such that they make a collective contribution to the character of the intersection of The Parade and Portrush Road. Therefore, as inferred by the Commissioner in *Bond v Norwood Payneham & St Peters*, it may be more important to ensure that new development is compatible with the context of the collection of State Heritage Places, than would be the case if the development was adjacent to a single heritage place.

In other words, any development of the subject land needs to have a respectful impact on the heritage character of the locality, not just individual heritage listed properties. In this context, the Council considers that the proposed building is too large and too overbearing, such that it will negatively impact on the heritage character of the locality. In short, the proposed building does not respect or have enough regard to the context of surrounding built form.

Whilst the Council acknowledges that some attempts have been made to reference the adjacent heritage properties in the design and materiality of the proposed building, the sheer scale of the building is such that it will diminish the prominence and will likely detract from the collective character and value of the adjacent State Heritage Places.

Built Form and Setbacks

The maximum building height stated for the Business Zone is two (2) storeys. This policy recognises the adjacency of the land to the Residential Historic (Conservation) Zone and the impacts that buildings greater than two storeys in height typically have on residential amenity, such as overshadowing, overlooking and visual incompatibility.

That said, the Council recognises that the subject land has the potential to accommodate a building of greater than two storeys height, whilst at the same time achieving the objectives of the Development Plan, in terms of achieving compatibility with adjacent residential and heritage listed properties.

In particular, the size of the property provides scope for some scaling up of height from Bowen Street at the rear, towards the two arterial road frontages of the property, to an extent that does not compete for prominence with the adjacent State Heritage Places.

The Council also notes that the proposed building is thirty eight (38) metres high. Whilst a building of this height would typically comfortably accommodate nine (9) floor levels, the proposed building has unusually high ceilings, resulting in eight (8) floor levels, in addition to a basement. In this regard, if Department staff and the Minister are generally supportive of the proposal, the Council requests that at the very least, the overall height of the proposed building be carefully re-considered, such that some of the building mass is reduced, without compromising the overall integrity of the Development Application.

Aside from the implications of the height and scale of the proposed building on the character of the locality, the shadow diagrams provided in the Development Report show that it would cause an extensive amount of shadowing of residential properties located south and south-east of the subject land. The extent of overshadowing is considerably in excess of the standards that are set within the Development Plan; standards which were derived from the South Australian Planning Policy Library and Good Residential Design SA.

In particular, City Wide Principles of Development Control 195 and 196 state respectively:

"Unless otherwise specified in the relevant Zone and/or Policy Area, development should ensure that the north-facing windows of habitable rooms of dwelling(s) on adjacent sites receive at least 3 hours of direct sunlight over a portion of their surface and in the case of the main living area windows, a minimum of 50% of their surface, between 9am and 5pm on the winter solstice (21 June). Development should not increase the overshadowed area in cases where overshadowing from existing structures, fences and non-deciduous vegetation already exceeds this requirement."

and

"Unless otherwise specified in the relevant Zone and/or Policy Area, development should ensure that at least half of the ground level private open space of existing dwelling(s) receive direct sunlight for a minimum of two hours between 9.00am and 3.00pm on 21 June. Development should not increase the overshadowed area in cases where overshadowing already exceeds these requirements."

Due to the compact nature of residential properties on the south-eastern side of Bowen Street, it is evident from the shadow diagrams prepared by MPH (when overlaying allotment boundaries and taking into consideration shadowing from boundary fences and vegetation), that many of those properties do not currently receive sunlight in accordance with the standards set out in Principles 195 and 196.

The shadow diagrams also show that after midday, those properties will receive no sunlight, with the shadow cast by the proposed building extending approximately eighty (80) metres from the subject land by 3:00pm during the winter solstice. Therefore, contrary to Principles 195 and 196, the proposal will increase overshadowing of windows and private open space, in situations where overshadowing already exceeds Development Plan requirements.

Being located within the Business Zone, there are no specific boundary set-back policies that are relevant to the site, other than qualitative provisions which aim to achieve compatibility with nearby development. As the Development Plan seeks development that reinforces the corner of the site, the proposed setbacks from The Parade and Portrush Road are considered reasonable. The siting of the building in relation to Bowen Street is also considered reasonable, in and of itself, however the impacts on the character of the street and overshadowing which result from the combination of the building height and setback, are not considered reasonable.

The general facade aesthetic is considered to be acceptable, in that the building is clearly contemporary, whilst incorporating materials found in the local area such as sandstone, referencing adjacent heritage buildings. The use of 'lighter' materials above the relatively solid podium is also a positive aspect of the design.

Traffic and Parking

With respect to the proposed amount of car parking, the following car parking rates are applicable to the proposed development:

Component	Car Parking Rate	Source	Car Parking Required
Retail	5 spaces per 100m ²	Development Plan	26 spaces ¹
Café & restaurant	1 space per 3 seats	Development Plan	100 spaces ²
Office	4 spaces per 100m ²	Development Plan	452 spaces
Fitness centre	7 spaces per 100m ²	Parking Spaces for Urban Places: Car Parking Study (LGA)	62 spaces
Business related accommodation	1 space per 4 bedrooms	Development Plan	4 spaces ³
Total			644 spaces

¹ Assumes half ground level retail/café space to be retail.

² Assumes half ground level retail/café space to be café and a density of 1 seat per 3m² of café/restaurant areas

³ Assumes a density of 1 bed per 50m² of business accommodation area.

If the subject land was located within a Designated Area (as defined in the Development Plan), such as the District Centre (Norwood) Zone, different car parking rates would apply. Given that the subject land is located directly adjacent to the District Centre (Norwood) Zone, which is located on high frequency bus route, it is considered reasonable to apply the car parking rates that apply to that zone. The following table shows the car parking demand associated with the proposal, using the rates applicable to the District Centre (Norwood) Zone.

Component	Car Parking Rate	Source	Car Parking Required
Retail	3 spaces per 100m ²	Development Plan	16 spaces
Café & restaurant	3 spaces per 100m ²	Development Plan	30 spaces
Office	3 spaces per 100m ²	Development Plan	339 spaces
Fitness centre	3 spaces per 100m ²	Development Plan	27 spaces
Business related accommodation	1 space per 4 bedrooms	Development Plan	4 spaces
Total			416 spaces

The proposal includes the provision of 296 car parking spaces. Applying the discounted car parking rates that apply in the District Centre (Norwood) Zone and other Designated Areas, this represents a shortfall of 120 car parking spaces, or 116 car parking spaces if a further discount is applied for the business related accommodation, which may in practice, generate very little if any parking demand, given it will most likely be used by interstate or overseas guests or clients, who would not generate any parking demand.

It is important to recognise that the discounted car parking rates that have been applied, resulting in a 116 car parking space shortfall, already factor in significant discounts to the standard rates, primarily due to the convenience of the subject land to frequent public transport.

Unlike a similar development located within the Adelaide CBD, it is considered extremely unlikely that a demand of less than three (3) car parking spaces for every 100m² of floor space (excluding atriums, balconies etc), would be realised for the proposed development. It is therefore extremely likely that a large number of cars associated with the proposal, will park in the local residential streets.

The inadequacy of the on-site car parking is considered to be a serious shortcoming of the proposal, which is likely to result in:

- a reduction in convenience and amenity to local residents and businesses;

- inconvenience to staff, visitors and customers associated with the proposed development; and
- traffic safety issues due to drivers being unable to find a car parking space and subsequently 'circling' the area in an attempt to find a parking space.

In terms of traffic generation more generally, the fact that the development is 6 storeys over the relevant Development Plan height policy and commensurately more intense than what could reasonably be anticipated for the subject land, the traffic generated by the proposal would be substantially higher than that which would otherwise be the case. The resultant increase in the number of vehicle movements within the adjacent local residential streets is a significant concern which has not been adequately addressed.

Whilst it is noted that the Applicant's traffic consultants, GHD, are satisfied that the traffic arrangements are safe and convenient, this has been modelled based on the number of car parking spaces provided, rather than the number of cars likely to be generated, as calculated above. In any event, it is suggested that the traffic generation likely to arise from the proposal, should be reviewed by an independent consultant, engaged by the DAC.

Summary

The proposal is of a vastly different scale and form of development to that which the Development Plan envisages for the subject land. Although the applicable policy contained in the Development Plan has not been recently reviewed, the same issues that are likely to have influenced the policy remain of relevance.

In particular, the subject land is located immediately adjacent to four (4) State Heritage Places and residential properties in a Residential Historic (Conservation) Zone. Therefore, hypothetically speaking, whilst more contemporary policy for the subject land would most likely allow for increased flexibility to facilitate a sympathetically designed multi-storey mixed-use development, it is most unlikely that any new Policy, if proposed in a balanced, objective and practical manner, would allow for a development of the scale proposed, given the number of constraints affecting the subject land and its surrounds.

The proposal is considered to be too large in height and overall scale, such that it will have an adverse impact on adjacent State Heritage Places, the historic character of the locality generally and the residential amenity of the nearby residents. The proposal is also considered to have a significant shortfall in on-site car parking, which will likely lead to on-street parking impacts within the local streets.

The Council recognises that the building design and appearance is, in and of itself, of a very high standard. It is clear that careful consideration has been given to achieve a building design that will provide a high degree of amenity and comfort for occupants and visitors, improve the 'human' interface with the adjacent public realm, minimise its environmental footprint, manage stormwater appropriately and create a visual land mark.

The Council acknowledges that the 'Major Development' assessment process requires DPTI staff, the Minister and the Governor to consider a range of other documents and policies in addition to the Council's Development Plan, including at a minimum:

- the Development Act and Regulations;
- If relevant, the Building Code of Australia;
- the South Australian Planning Strategy;
- the *30-Year Plan* for Greater Adelaide
- the Integrated Land Use and Transport Plan
- the Development Report and the Minister's Assessment Report, following the public consultation period; and
- where relevant, any other government policy and/or legislation.

The Council also acknowledges that if constructed, the building will also generate significant commercial investment, jobs and economic activity at the eastern fringe of the District Centre (Norwood) Zone, all of which would boost the competitiveness of The Parade, as a good place to do business and recreate. However, the Council considers that the many positive aspects of the design and overall proposal do not outweigh the fundamental shortcomings of the proposal, all of which arise from the excessive intensity and scale of the development. More specifically, the Council's key concerns are summarised as follows:

1. the Council considers that the scale of the development is manifestly excessive for the subject land and its context;
2. the Council considers that the scale of the proposed building will have a significant adverse effect on the heritage value of four (4) adjacent State Heritage Places and the historic character of the locality generally;
3. the Council considers that the proposed building will have a significant adverse impact on the amenity for residents living in the residential area to the south-east within Kensington, through detrimental impacts on visual amenity, overshadowing and general noise and activity associated with the scale of the proposed development;
4. the Council considers that the amount of on-site car parking proposed is inadequate and will lead to significant pressure on on-street car parking within the local streets, thereby resulting in inconvenience, loss of amenity and on-street parking opportunities for other residents and businesses in the locality; and
5. the Council considers that the proposal does not warrant approval on the basis of the deficiencies and issues outlined in this letter.

If you would like any clarification of the Council's comments, please do not hesitate to contact me on 8366 4501.

Yours sincerely



Carlos Buzzetti
GENERAL MANAGER
URBAN PLANNING & ENVIRONMENT

File No:
2014/10746/01

24 October 2016

Ref No:
10916507

Ms Laura Kerber
Senior Planning Officer
Development Division
Department of Planning, Transport and Infrastructure
Level 1, 211 Victoria Square
Adelaide SA 5000

Dear Ms Kerber,

In response to the Major Project process for:

270 The Parade, Norwood

As part of the Major Project assessment for the development application at the above address, I am pleased to provide the final recommendations from the Design Review process for your consideration.

The proposal was presented to the Design Review Panel at two review sessions. I acknowledge the willingness with which the project team has engaged with the Design Review process.

In principle, I support the diversity of uses for the development, the public realm improvements and the intent to create a gateway building to The Parade precinct. I commend the project team's aspirations to provide a working environment that promotes wellbeing. I support the proportions and articulation of the podium that respond to the current and anticipated precinct context. To achieve the best possible design outcome for this proposal, I recommend several conditions or reserved matters you may like to consider to protect the current intent of the proposal.

The subject site is approximately 5,935 square metres, located wholly within the city block between The Parade, Portrush Road and Bowen Street. The surrounding context includes a number of residential dwellings and small scale commercial properties, as well as a number of State and Local Heritage Places surrounding The Parade and Portrush Road intersection. The site is subject to a requirement for road widening under the provisions of the *Metropolitan Adelaide Road Widening Plan*. The proposal incorporates the future Parade road widening into the site by providing a setback from the northern boundary.

The proposed building will be a new landmark on The Parade, with eight above-ground levels for mixed use (retail, office, meeting, public restaurant and car parking), and one level of basement car parking. In principle I support the mix of uses, and welcome the benefit the increased daily population could bring to the precinct. The building has an overall above-ground height of 38.15m to the highest point of the facade. Given the existing low scale of adjacent properties and general character of the area, the massing and apparent bulk of this development will present a significant contrast to the immediate context. As such, mitigating the impact of the proposed height and massing will be essential to the success of the proposal. I recommend further consideration of the upper level cantilevered facade, its geometry and visual impact on the site's landmark corner location.

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File No:
2014/10746/01

Ref No:

I recognise the potential benefit of a new gateway building to The Parade precinct, however my support for the proposal is subject to the scheme's successful contribution to the public realm, particularly given the prominent nature and size of the site. The proposal includes the provision of 296 car parks, accessed from The Parade, Bowen and High Streets. Three levels of the car parking are located above ground, a function that is inconsistent with the main street character of The Parade however this has been somewhat attenuated by the sleeving of the ground floor car parking with retail spaces that frame the main lobby. I acknowledge the ceiling heights of the car park levels to allow for adaptive reuse, however I strongly encourage further exploration of opportunities to relocate a greater proportion of the above-ground car parking to the basement levels to attenuate the impact of this use on the public realm.

The building area proposes floor to floor levels of 4.2m to the five levels of the development above the car park levels. While I support the provision of generous ceiling heights, the accumulated overall height adds bulk to the building form. I recommend further consideration of the ceiling heights to successfully integrate the services requirements while maintaining amenity for the office areas. I also recommend further consideration of the location of the central plant rooms with the view to minimise visibility and any potential additional overshadowing to Bowen Street.

The current architectural expression to the podium aims to achieve an identity that reflects the unique location of the site within a heritage precinct, and is represented as two elements contrasting in material and expression. The podium is characterised by a horizontally proportioned form that is clad in sandstone. Further design detail refinement is anticipated as the project progresses, with particular reference to the podium cladding detail, Bowen Street interface as well as any necessary secondary structure required by the proposed facade treatment.

The upper levels of the development are set back from the podium edge and are characterised by a folded and fritted glass facade with the intent to reduce the mass and bulk of the proposal and reference the verticality and angle of the church spire. In my opinion, the detailing of the facades is critical to a successful design outcome that is commensurate with the distinctive location. I recommend further refinement of the facade treatments referencing the specific environmental factors of each elevation, including access to natural ventilation for the southern balconies, is undertaken. I also recommend further consideration of the daytime quality of the proposed glass and its integration with supporting structure and safety barriers.

The scheme proposes an active retail edge to The Parade and Portrush Road interface, with the transparency of the retail component aiming to open up the site corner. A full height, glass atrium addresses the corner and is the interface of the City and Kensington Park 45 degree grids. The built form intends to reflect the unique interface of the grids, with the form evolving out of the site shape. I recommend further design development and analysis of the retail and cafe functions is undertaken to ensure the design intent for visual permeability is realised and the proposal offers a generous and positive contribution to the public realm.

The scheme has lengthy frontages to The Parade and Portrush Road that require careful management to contribute positively to the typology of the street networks in this locality. The character of Bowen and High Streets is vastly different to that of Portrush Road and The Parade. I support the aspiration for a building that interprets the surrounding materials palette in a modern form.

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File No:
2014/10746/01

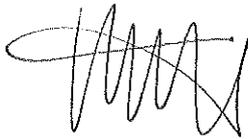
Ref No:
10916507

The building is characterised by a horizontally proportioned facade that integrates a walking track and landscaped terraces. I support this provision of green space and increased staff amenity, however I recommend the design team undertake further design development of the scale and distribution of outdoor spaces with a view to reducing the scale and apparent bulk of the building.

To ensure the most successful design outcome is achieved, the Minister may like to consider conditions or reserved matters to protect or ensure the following elements of the proposal:

- Provision of additional details and materials sample board to demonstrate how the ambition for the facade treatments as outlined in the design statement is achieved in practice.
- Provision of detailed information to demonstrate the maintenance and access strategies for the landscaping, to ensure the ongoing quality of the podium interface with neighbouring properties.
- Provision of further clarification of the amendments to the public realm at the northern boundary with regards to the landscaping elements proposed within the future Parade road widening location.

Yours sincerely



Kirsteen Mackay
South Australian Government Architect

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Ref: SH/13171 D
Date: 24 October 2016

The Chief Executive Officer
Department of Planning, Transport and Infrastructure
GPO Box 967
ADELAIDE SA 5001
Attention: Laura Kerber

STATE HERITAGE UNIT

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Directorate

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Dear Ms Kerber

**DESCRIPTION: PEREGRINE CORPORATION MIXED USE DEVELOPMENT – 270 THE PARADE,
KENSINGTON GARDENS – FINAL DEVELOPMENT REPORT**

Referral received: 28/09/2016
State heritage place: SH/13171—Clayton Wesley Uniting (former Congregational) Church complex (including 1882 Church, 1856 Chapel, 1875 Hope Hall and 1910 Clayton Institute), 278 Portrush Road BEULAH PARK
SH/10950—Former Norwood Wesleyan Methodist Church, Hall and Front Fence, 239 The Parade NORWOOD
SH/12689—Two-storey Shops and Upstairs Dwellings, 258-262 The Parade NORWOOD
SH/10609—Benson Memorial Drinking Fountain, Portrush Road KENSINGTON

The final Development Report for the above project proposal has been referred to the Minister for Sustainability, Environment and Conservation in accordance with section 46D of the *Development Act 1993* for a response in relation to Guideline 1 of the Development Assessment Commission's "*Guidelines for the preparation of a Development Report*" dated September 2016.

CRITICAL ASSESSMENT

Heritage Context

Guideline 1: State Heritage Places are located on the north west, north east and south west corners of the Parade and Portrush Road intersection, as well as the State Heritage listed Benson Memorial Drinking Fountain to the south of the subject site. The subject site is also adjacent two contributory items on Bowen Street and in close proximity to Local Heritage Places. It should therefore be demonstrated how the proposal respects and responds to the heritage context of this visually prominent intersection and the adjacent Residential Character Zone.

Evaluate the impacts of the proposal on the heritage context of the locality, taking into account scale, massing, configuration and design.

This response concerns the State heritage places identified above, and the context within which those places are situated. It does not consider the contributory items or local heritage places referred to in Guideline 1.

Section 4.1.1 of the submitted Development Report (pp 20-22) addresses Guideline 1, drawing on the findings of the *Heritage Impact Assessment* prepared by DASH Architects (dated 11/08/2016 and included with the Report as Appendix O).

I concur generally with the analysis of impacts on State heritage places set out in the *Heritage Impact Assessment*, and (subject to the recommendation set out below) consider the proposed

development acceptable in relation to the above State heritage places for the following reasons identified in the *Heritage Impact Assessment*.

- *As the Subject Site contains no State Heritage places, potential State Heritage impacts are limited to those associated with the context of the nearby State Heritage places.*
- *It is acknowledged that the proposed development will be a notable visual element within the streetscape. Its impacts on the context of surrounding State Heritage places is, however, primarily limited to those on the adjacent Clayton Wesley Church, that's visual dominance in the existing locality was recognised in the heritage assessment that formed the basis of its original State Heritage nomination.*
- *The context and setting of the other surrounding State Heritage places is primarily to their immediate street frontage, and their interrelationship with each other (which the proposed development does not affect).*
- *The proposed development will also have limited impact on the primary setting and view corridors of the Clayton Wesley Church, namely looking eastward from the western end of The Parade, where the dog-leg in The Parade across Portrush Road has the effect of setting the proposed development back from this important view corridor.*
- *The design response to this context (is) through the establishment of a strong podium base (of a more monolithic, fine grained character), and visually 'lighter' upper levels.*
- *The use of a 'flowing veil' upper façade skin visually softens the upper storeys, and creates a contrasting backdrop to the strong geometric forms of the Clayton Wesley Church spire when viewed from the north.*
- *This overall articulation, and careful use of materials, significantly mitigates the overall visual bulk and scale of the proposal in the context of its immediate surrounds.*
- *(The) approach to the material selection on the project greatly contributes to its integration into the existing streetscape, particularly with regards to the identified State Heritage places, and the mitigation of the proposal's overall visual bulk and scale.*
- *It is within the immediate environs of the Clayton Wesley Church where the visual impacts of the proposed development will be most notable. These impacts have, however, been substantially mitigated through the design measures noted above.*
- *The Benson memorial drinking fountain's primary setting and context is, as noted, to the intersection of High Street and Portrush Road. Its spatial relationship to the adjacent Sisters of St Joseph is also an important aspect to the significance of this item. The proposed development will have negligible, if any, material impact on this context and setting.*

Recommendation

The following condition based on that recommended in the *Heritage Impact Assessment* should be incorporated into any consent or approval.

Condition 1: Proposed façade detailing and materials selections are to be further documented to the satisfaction of the relevant authority in consultation with the Government Architect and Department of Environment, Water and Natural Resources prior to final Development Approval being granted.

Reason for condition: Final materials selection and detailing will be critical to achieving the high quality contextual design response anticipated.

General notes

1. Any changes to the proposal for which planning consent is sought or granted may give rise to heritage impacts requiring further consultation with the Department of Environment, Water and Natural Resources, or an additional referral to the Minister for Sustainability, Environment and Conservation. Such changes would include for example (a) an

application to vary the planning consent, or (b) Building Rules documentation that incorporates differences from the proposal as documented in the planning application.

2. In accordance with Regulation 43 of the *Development Regulations 2008*, please send the Department of Environment, Water and Natural Resources a copy of the Decision Notification.
3. The relevant authority is requested to inform the applicant of the following requirements of the *Heritage Places Act 1993*.
 - (a) If an archaeological artefact believed to be of heritage significance is encountered during excavation works, disturbance in the vicinity shall cease and the SA Heritage Council shall be notified.
 - (b) Where it is known in advance (or there is reasonable cause to suspect) that significant archaeological artefacts may be encountered, a permit is required prior to commencing excavation works.

For further information, contact the Department of Environment, Water and Natural Resources.

4. The relevant authority is requested to inform the applicant of the following requirements of the *Aboriginal Heritage Act 1988*.
 - (a) If Aboriginal sites, objects or remains are discovered during excavation works, the Aboriginal Heritage Branch of the Aboriginal Affairs and Reconciliation Division of the Department of the Premier and Cabinet (as delegate of the Minister) should be notified under Section 20 of the *Aboriginal Heritage Act 1988*.

For any enquiries in relation to this application, I can be contacted on telephone 8124 4935 or e-mail peter.wells@sa.gov.au.

Yours sincerely



Peter Wells
Principal Conservation Architect
DEPARTMENT OF ENVIRONMENT, WATER AND NATURAL RESOURCES
as delegate of the
MINISTER FOR SUSTAINABILITY, ENVIRONMENT AND CONSERVATION

From: Lawes, Phil (DPTI)
Sent: Monday, 14 November 2016 10:43 AM
To: Kerber, Laura (DPTI) <Laura.Kerber@sa.gov.au>
Cc: Whitford, Michael (DPTI) <Michael.Whitford@sa.gov.au>; Morias, George (DPTI) <George.Morias@sa.gov.au>
Subject: RE: Peregrine Major Development

Hi Laura

No, we have identified that 6.1m is required to accommodate the tram based upon the work undertaken by GHD (ie 4.5 + 1.6m). I have just noted that the number in 3rd paragraph under Guideline 4 showed 1.6m, whereas it should show 6.1m.

Apologies for the confusion.

George,
Can you provide the MARWP consent form?

Thanks

Phil Lawes

Manager, Infrastructure and Services Planning

Planning and Transport Policy

Department of Planning, Transport and Infrastructure

T 8343 2835 (22835) • M 0401 124 100 • E phil.lawes@sa.gov.au

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From: Kerber, Laura (DPTI)
Sent: Monday, 14 November 2016 9:40 AM
To: Lawes, Phil (DPTI) <Phil.Lawes@sa.gov.au>
Cc: Whitford, Michael (DPTI) <Michael.Whitford@sa.gov.au>; Morias, George (DPTI) <George.Morias@sa.gov.au>
Subject: RE: Peregrine Major Development

Thanks Phil

I'm assuming Reserve Matter #1 should cite '1.6m' instead of '6.1m'? Are you happy for me to edit this change in your email?

Also – is the MARWP consent form referred to in Note #1 available?

Many thanks

Laura Kerber

Senior Planning Officer

Strategic Development Assessment

Planning and Development

Department of Planning, Transport and Infrastructure

T 7109 7073 (97073) • E Laura.Kerber@sa.gov.au

• Level 2, GHD Building, 211 Victoria Square Adelaide SA 5000 • GPO Box 1815 Adelaide SA 5001 • DX 967

• www.dpti.sa.gov.au

From: Lawes, Phil (DPTI)

Sent: Friday, 11 November 2016 8:01 AM

To: Kerber, Laura (DPTI) <Laura.Kerber@sa.gov.au>

Cc: Whitford, Michael (DPTI) <Michael.Whitford@sa.gov.au>; Morias, George (DPTI) <George.Morias@sa.gov.au>

Subject: FW: Peregrine Major Development

Hi Laura

Please see below the comments from 'transport' in DPTI. These comments have been approved by Paul Gelston.

Thanks

Planning and Transport Policy Directorate and Traffic Operations have undertaken a review of the Development Report for 270 The Parade Kensington Gardens, Peregrine Corporation Mixed Use Development, and the associated Transport, Access & Pedestrian Impact Assessment Report by GHD.

Below are comments in relation to guideline 4 and guideline 6.

Guideline 4

The proponent has again presented three tram options that would not be accepted as practical solutions as they do not provide appropriate pedestrian and bicycle facilities in accordance with the Austroads guidelines.

Based upon the information provided, P&TP has identified that an additional 1.6 metres over and above the 4.5 metres identified by GHD would allow for the provision of the tram, vehicle lanes, cycle lanes, and appropriate footpath width.

The proposal plans prepared by MPH show considerable space on the proponents site being retained at ground level for planter boxes and street trees. The requirements of guideline 4 can be met if a 6.1m strip of land on The Parade frontage parallel to the proposed tram line is made available to allow the space to be utilised as a public footpath should it is required for the tram proposal detailed in the Integrated Transport and Land Use Plan. The basement should be setback to enable the land to be transferred to road in the future and to enable services etc. to be located within this area should it be required.

Guideline 6

The proponent has provided traffic analysis of the affected road intersections for the 2016 Development case.

It is considered that there is a sufficient understanding of the implications for traffic to not object to the progression of the Development Application. It is nevertheless considered that further more detailed assessment of the specific issues identified below is required to ensure the safety and effective operation of the arterial road network, by way of reserve matters.

Access and Road Safety

The proponent should be advised of the following issues that need to be resolved to the satisfaction of DPTI:

- Vehicle queuing needs to be catered for onsite should boom gates or similar traffic control device be envisaged at The Parade access point to avoid queuing onto The Parade.
- The Parade access is identified as being limited to left turn in and left turn out movement only. However, there is no method identified for limiting the access to this arrangement shown in the plans.

Traffic Impact Assessment

The proponent should be advised of the following issues that need to be resolved to the satisfaction of DPTI:

- Traffic generation must be calculated for all uses envisaged by the proposal for the surrounding road network peak period.
 - DPTI considers that five of the seven proposed uses that are currently excluded should be included.
 - The 665m² accommodation should be included in the traffic generation calculation unless there are specific requirements in the major project approval that restricts the use of this space to very rare international business partners short term stays e.g. a total of one month per year.
 - Discounts to traffic generation should be applied for shared or common trips in accordance with best practice guidelines.
- Traffic distribution should be split into entering and exiting directions as per traffic generation best practice guidelines.
- The models of the existing situation should be prepared and calibrated to the satisfaction of DPTI
- The Portrush Road/High Street junction model should include development traffic and consider the operation of the nearby Portrush Road/The Parade intersection.
- The SIDRA modelling must ensure that the:
 - Geometry is updated to be consistent with the lane lengths and operation of the sites.
 - Phasing is updated to be consistent with the operation of the Portrush Road/The Parade site.
 - Portrush Road right turns filter.
 - F1 and F2 phases not modelled which improve operation of the intersection.

It should be noted that officers from Planning and Transport Policy, and Traffic Operations are available to meet with the proponent to resolve the issues above as required.

In view of the above, it is recommended that the following reserved matters are applied to any approval:

Reserved Matters

1. The proponent will make arrangements with the Department of Planning, Transport and Infrastructure to permit the use of a strip of land up to 6.1m in width from The Parade frontage of the site.
2. The proponent will provide an updated Traffic Impact Assessment that evaluates the traffic impact of the development on the surrounding road network by undertaking traffic analysis and modelling of the proposed access points and the affected road intersections/junctions (i.e. Portrush Road/The Parade intersection and Portrush Road/High Street junction) to the satisfaction of DPTI. This should address the following:
 - Daily and road network peak traffic generation must be calculated for all uses envisaged by the proposal and appropriate discounts should be applied for shared or common trips in accordance with best practice guidelines
 - Traffic distribution must be split into entering and exiting directions as per best practice guidelines.
 - The models of the existing situation must be prepared and calibrated to the satisfaction of DPTI
 - The SIDRA network models shall not be used
3. Fund and implement any road improvements identified through Item 2.

Conditions of Approval

1. All vehicular access to the subject development shall be via The Parade, High Street and Bowen Street only. No direct vehicular access to Portrush Road shall be permitted.

2. The Parade access shall be limited to left turn in and left turn out movements only. This shall be achieved by the extension of the solid median on The Parade from the Portrush Road/The Parade intersection to Bowen Street.
3. All road works on arterial roads shall be designed and constructed to the satisfaction of DPTI with all costs (including design, construction, project management and any road lighting or stormwater upgrades) being borne by the applicant. The applicant shall enter into a Developer Agreement with DPTI regarding these works and is required to contact DPTI, Traffic Operations, Network Integrity Engineer, Mrs Christina Canatselis via 8226 8262 or christina.canatselis@sa.gov.au to progress this. All road works shall be completed prior to operation of the development.
4. The applicant shall provide a traffic management plan for the construction period of the development. This shall be submitted to and approved by DPTI and Council prior to construction commencing on-site. All construction movements shall be in accordance with the approved traffic management plan.
5. No stormwater from this development shall be permitted to discharge on-surface to Portrush Road or The Parade. In addition, any existing drainage of Portrush Road or The Parade shall be accommodated by the development and any alterations to road drainage infrastructure as a result of this development shall be at the expense of the applicant.
6. All materials and finishes shall not be permitted to result in glare or other effects that will result in the discomfort or impairment of road users.
7. Signage on this site must be in accordance with the "Advertising Signs Assessment Guidelines for Road Safety".
8. All service vehicle movements associated with the development shall be undertaken outside of peak traffic hours on the adjacent roads.

Note

- The Metropolitan Adelaide Road Widening Plan shows a possible requirement for a strip of land up to 4.5 metres in width from the Portrush Road frontage of this site for future upgrading of the Portrush Road/The Parade intersection, together with additional land at the Portrush Road/The Parade and Portrush Road/High Street corners. The consent of the Commissioner of Highways under the Metropolitan Adelaide Road Widening Plan Act is required to all new building works located on or within 6.0 metres of the possible requirement.

As the development encroaches within the above requirements, the applicant will need to apply for consent for these under the Metropolitan Adelaide Road Widening Plan Act. The applicant should fill out the attached consent form and return it to DPTI with 3 copies of the approved plans and a copy of the Decision Notification Form.

- Should boom gates or similar traffic control device be envisaged, vehicle queuing must be catered for onsite to avoid queuing onto The Parade.

Phil Lawes

Manager, Infrastructure and Services Planning

Planning and Transport Policy

Department of Planning, Transport and Infrastructure

T 8343 2835 (22835) • M 0401 124 100 • E phil.lawes@sa.gov.au

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METROPOLITAN ADELAIDE ROAD WIDENING PLAN ACT, 1972



Government of South Australia

Department of Planning,
Transport and Infrastructure

*APPLICATION FOR CONSENT OF THE COMMISSIONER OF HIGHWAYS
FOR BUILDING WORK*

Owner's Name _____

Applicant's Name _____
(If not owner)

Relationship to Owner (Lessee, Prospective Purchaser, Etc.) _____

Postal Address _____

Postcode _____

Location of Proposed Building Works (Full Details Required):

L.T.O. Plan No.: _____ Allotment No.: _____ Section: _____

Hundred: _____ House No.: _____

Street Name _____ Suburb: _____

Certificate of Title _____

Volume _____ Folio _____

Nature of Proposed Building Work _____

Proposed Location of Building Work on Land:

Distance from existing front road boundary to nearest point of building _____

Distance from existing side boundary (if on corner) to nearest point of building _____

Total estimated cost of proposed building work \$ _____

Estimated cost of proposed building work on land to which the Act applies \$ _____

Signature(s): _____ Date _____
(Applicant) (Owner or Authorised Agent)

Notes:

1. *Three (3) copies of the **approved site plan** describing fully the nature and extent of the proposal must be forwarded with this application form together with one copy of the notification of the relevant authority's decision to approve the development under the Development Act 1993.*
2. *The Act requires that the consent of the Commissioner of Highways must be obtained for any building work on land to which the Act applies.*
3. *The Act applies to all land shown on the Metropolitan Adelaide Road Widening Plan as possibly required for road widening and all land within six metres of the boundary of that land.*

PLEASE RETURN TO: COMMISSIONER OF HIGHWAYS
DEPARTMENT OF PLANNING, TRANSPORT AND INFRASTRUCTURE
GPO BOX 1533
ADELAIDE SA 5001

For further information regarding the Metropolitan Adelaide Road Widening Plan Act,
please contact DPTI on (08) 8226 8384.

PEREGRINE MAJOR DEVELOPMENT: 270 THE PARADE, KENSINGTON

Topic	Issue	Action / Outcome
HEIGHT	Overshadowing	<ul style="list-style-type: none"> - Provide pre-development (ie current) overshadowing diagrams to demonstrate the actual impact of the proposal on overshadowing. - Provide further analysis of the impacts of overshadowing to dwellings on Bowen Street and beyond – High Street and Phillips Street. The DR does not provide a detailed analysis of whether 50% of the private open spaces and 50% of the north facing windows on affected dwellings receive the minimum hours of direct sunlight in accordance within PDC 195 and 196, for both the current situation and the proposed scenario. This assessment should address the comments made by Council in relation to exceedance of the Development Plan requirements. - Impact to solar panels from overshadowing.
	Overlooking	<ul style="list-style-type: none"> - Explanation of the impacts of overlooking with the revised design, including beyond the Bowen Street dwellings. - Additional sections are required to show the extent (if any) of overlooking south of the subject site to the adjacent Mary Mackillop Centre / Tappenier Court Nursing Home.
	Heritage	<ul style="list-style-type: none"> - The analysis regarding the visual impact of the development when viewed from the North and South along Portrush Road is very brief (pg 20 of the Heritage Impact Statement). The images (21 and 22) provided to accompany this analysis view the development at an angle, not directly north/south along Portrush Road. Additional imagery and further analysis is required regarding the impact to the heritage context / character from the north and south.
	Design (also refer Government Architect comments)	<ul style="list-style-type: none"> - Further consideration of the upper level cantilevered façade (geometry and visual impact) - Further consideration of ceiling heights - Further refinement of the façade treatments - Further design development of the scale and distribution of outdoor spaces with a view to reducing the scale and bulk of the building - Consideration of the engineering requirements for the upper level glass façade to achieve the vision depicted in the design drawings. - Provision of a materials board.
	Context	<ul style="list-style-type: none"> - Provision of elevations that illustrate how the building will sit in relation to the adjacent heritage buildings, the water tower, and the approved buildings on The Parade (eg Nuovo). - Consider the use of a 3D model.
TRAFFIC & ACCESS	Tram Corridor and Traffic Impact Assessment	<ul style="list-style-type: none"> - Response to DPTI comments in particular the proposed Reserved Matters and Conditions.
CAR PARKING	Undersupply of car parking numbers and use of the training facility	<p>Further explanation, analysis and justification is required regarding the proposed car parking arrangements:</p> <ul style="list-style-type: none"> - For each land use (office, restaurant, training rooms etc) when is the peak (parking) period, and what overflow is expected beyond the car parking spaces provided in the building? - Further explanation regarding the nature / frequency of use for the training theatre and the resultant demand for car parking.

PEREGRINE MAJOR DEVELOPMENT: 270 THE PARADE, KENSINGTON

Topic	Issue	Action / Outcome
		<ul style="list-style-type: none"> - How will the projected increase in staff numbers (up to 400 in 3 years) be accommodated? - What is the capacity for on-street parking in the surrounding residential streets? - Has there been any consideration of opportunities to utilise other car parking facilities in the locality? - What will be the car parking arrangements during construction to minimise impacts to traffic flow and amenity on residential streets? - Is there any capacity for additional basement parking?
OTHER	Refer to issues raised in the public submissions	<ul style="list-style-type: none"> - Impact to wi-fi connectivity in the locality: concerns that the building will block signals from the water tower infrastructure. Has this been considered? - Additional plans and further explanation is required regarding the accommodation layout – suite delineation, access arrangements, connectivity with other uses on the Level & after hours access. - The GHD Traffic Report remains in 'draft form' and does not accurately reflect the most recent scheme in terms of floor areas for each land use. This report should be updated and re-issued as part of the Response Document. - The Guidelines document included in the DR is not the most recent version.



APPENDIX D
DASH ARCHITECTS – HERITAGE IMPACT ASSESSMENT
SUPPLEMENT

DASH (Danvers Schulz Holland) Architects was founded in 1964 and has since established itself as one of South Australia's leading practices in the provision of specialist heritage services.

DASH Architects has been at the forefront of the development of a sustainable paradigm for the conservation of cultural heritage within Australia. This approach is based on contemporary values and traditions, and recognises the importance of both tangible and intangible cultural significance within our community.

Peregrine Head Office Redevelopment

270 The Parade, Kensington Park

Heritage Impact Assessment – Supplement

DA163272 Issue –

22.11.16

1.0 Introduction

This Supplementary report has been prepared by Jason Schulz, Director of DASH Architects.

In August 2016 I was engaged by Shahin Brothers Pty and Shahin Group Pty Ltd to undertake a Heritage Impact Assessment (HIA) of the proposed redevelopment at 270 The Parade, Kensington Park. This engagement extended to the provision of heritage advice to the design team, MPH Architects, during the development of the concept and current application.

This proposal was lodged for Development Plan Consent with the Department of Planning Transport and Infrastructure's (DPTI) Development Assessment Commission.

A number of amendments have since been made to the proposal following public consultation of the application. These amendments include:

- Basement area reduced in NW and NE corner by deleting storage and reducing secure carpark;
- Ground Floor floor-to-floor increased to 4500mm from 3600mm;
- Level 1 floor-to-floor increased to 4500mm to allow for tiered seating in training theatre;
- EOT added to Level 1;
- Level 2 deleted;
- Level 3, 4 and 5 floor-to-floor decreased to 3800mm from 4200mm;
- Level 4 and 5 floor area increased to include walking track with perimeter tenancy glazing as part of fritted glazed screen;
- Level 5 verandah over hang and atrium roof solid in lieu of glazed.

This supplementary statement undertakes a review of these changes against the findings of my August 2016 HIA. This supplementary assessment is based on the following drawings issued from MPH Architects:

*dash*architects

1 Waymouth Place
Adelaide SA 5000
t 8231 8344
adelaide@dasharchitects.com.au
www.dasharchitects.com.au
ABN 82 059 685 059

Documentation prepared by MPH Architects as follows:

- 1465, 17/08/2016, SK00(5) Site Plan
- 1465, 17/08/2016, SK09(9) Basement Plan
- 1465, 17/08/2016, SK01(8) Ground Floor
- 1465, 17/08/2016, SK02(8) Level 1
- 1465, 17/08/2016, SK03(7) Level 2
- 1465, 17/08/2016, SK04(7) Level 3
- 1465, 17/08/2016, SK05(7) Level 4
- 1465, 17/08/2016, SK06(7) Level 5
- 1465, 17/08/2016, SK07(8) Level 6
- 1465, 17/08/2016, SK21(7) 3D Overview
- 1465, 17/08/2016, SK24(7) Parade looking West
- 1465, 17/08/2016, SK25(7) South East view from The Parade
- 1465, 17/08/2016, SK27(6) Portrush looking North
- 1465, 17/08/2016, SK35(5) Sections
- 1465, 17/08/2016, SK36(5) Elevations
- 1465, 17/08/2016, SK40(5) Solar Diagrams
- 1465, 17/08/2016, SK47(5) Parade looking East
- 1465, 05/05/2016, SK47 Finishes / Materials Images
- 1465, 17/08/2016, SK48(5) Portrush looking South
- 1465, 17/08/2016, SK49(5) High St looking West
- 1465, 17/08/2016, SK52(3) Solar Diagrams
- 1465, 17/08/2016, SK53(3) Sections
- 1465, 17/06/2016, SK54(2) Elevations
- 1465, 17/08/2016, SK55(4) Roof Plan
- 1465, 17/08/2016, SK57(3) Future Urban Vision

Disclaimer: This HIA has been based on the information scheduled above. Any changes to these scheduled items may result in differing heritage impacts to those considered and assessed in the below report. It is recommended that the above issue dates and revision numbers be confirmed to those lodged for Development Plan Consent when considering the findings are recommendations of this report.

2.0 Previous Findings

My Heritage Impact Assessment prepared for the DAC lodgement (dated 11.08.16, Rev A came to the following conclusions:

While the proposal is of a notable scale, its design has been developed in respond to the context of its surrounds, to reduce its visual bulk and scale, and limit any material impacts on the context of surrounding State and Local Heritage places.

Of the surrounding State Heritage places, the Clayton Wesley Church it most likely to be materially impacted by the proposed development, due to its proximity to the site, and current visual dominance. The proposed development will also have limited impact on the primary setting and view corridors of the Church, namely looking eastward from the western end of The Parade, where the dog-leg in The Parade across Portrush Road has the affect of setting the proposed development back from this important view corridor.

While the immediate context of the Church will be affected, such impacts needs to be considered in the context of:

- *recent nearby development application for buildings of a similarly notable scale;*
- *the quality of the design proposal, and noted design measures that lessen such impacts; and*
- *the natural and ongoing evolution the to setting of historic buildings, as has been the case to date with the ever expanding nature of Portrush Road and The Parade.*

For these reasons, and the design measures noted above, I consider the proposed development on the Subject Site to have an acceptable impact on the context of the surrounding State Heritage places.

Local Heritage impacts are largely negligible, with only two adjacent Local Heritage places, both of which are remnant former residential buildings. The Development Plan seeks proposals adjacent such places to demonstrate design consideration of their relationship with the heritage place. This provision applies to both State and Local Heritage places, however for reasons noted in my assessment, I consider the State Heritage response to take precedent. In responding to the State Heritage contextual issues, however, the design also demonstrates design consideration to the identified Local Heritage places through the selection of materials, mitigation of bulk and scale, and design references.

Impacts on the historic character of the adjacent Residential Historic (Conservation) Zone are limited, as the immediate interface with the Subject Site accommodates only one Contributory Item.

Impact on residential amenity and character are limited to Bowen Street, where the Development seeks the site's servicing, carparking and deliveries to be located. Once again, the design response seeks to lessen such impacts associated with a notable development of this size through the establishment of a clear podium level, materials selections, general articulation and upper level setbacks.

3.0 DEWNR Referral Advice

The application was referred to the Heritage Branch of the Department of Environment Water and Natural Resources (DEWNR) due to the site's proximity to nearby State Heritage places.

Referral advice provided by DEWNR's Principal Conservation Architect, Mr Peter Wells, dated 24 October 2016 advised:

I concur generally with the analysis of impacts on State heritage places set out in the Heritage Impact Assessment, and (subject to the recommendation set out below) consider the proposed development acceptable in relation to the above State heritage places for the following reasons identified in the Heritage Impact Assessment.

- *As the Subject Site contains no State Heritage places, potential State Heritage impacts are limited to those associated with the context of the nearby State Heritage places.*
- *It is acknowledged that the proposed development will be a notable visual element within the streetscape. Its impacts on the context of surrounding State Heritage places is, however, primarily limited to those on the adjacent Clayton Wesley Church, that's visual dominance in the existing locality was recognised in the heritage assessment that formed the basis of its original State Heritage nomination.*
- *The context and setting of the other surrounding State Heritage places is primarily to their immediate street frontage, and their interrelationship with each other (which the proposed development does not affect).*
- *The proposed development will also have limited impact on the primary setting and view corridors of the Clayton Wesley Church, namely looking eastward from the western end of The Parade, where the dog-leg in The Parade across Portrush Road has the effect of setting the proposed development back from this important view corridor.*
- *The design response to this context (is) through the establishment of a strong podium base (of a more monolithic, fine grained character), and visually 'lighter' upper levels.*

- *The use of a ‘flowing veil’ upper façade skin visually softens the upper storeys, and creates a contrasting backdrop to the strong geometric forms of the Clayton Wesley Church spire when viewed from the north.*
- *This overall articulation, and careful use of materials, significantly mitigates the overall visual bulk and scale of the proposal in the context of its immediate surrounds.*
- *(The) approach to the material selection on the project greatly contributes to its integration into the existing streetscape, particularly with regards to the identified State Heritage places, and the mitigation of the proposal’s overall visual bulk and scale.*
- *It is within the immediate environs of the Clayton Wesley Church where the visual impacts of the proposed development will be most notable. These impacts have, however, been substantially mitigated through the design measures noted above.*
- *The Benson memorial drinking fountain’s primary setting and context is, as noted, to the intersection of High Street and Portrush Road. Its spatial relationship to the adjacent Sisters of St Joseph is also an important aspect to the significance of this item. The proposed development will have negligible, if any, material impact on this context and setting.*

DEWNR’s advice went on to recommend the following Condition to any Approval:

Condition 1: Proposed façade detailing and materials selections are to be further documented to the satisfaction of the relevant authority in consultation with the Government Architect and Department of Environment, Water and Natural Resources prior to final Development Approval being granted.

Reason for condition: Final materials selection and detailing will be critical to achieving the high quality contextual design response anticipated.

4.0 ODASA Recommendation

The conceptual development of the proposal underwent the Design Review process by the Office for Design + Architecture SA (ODASA). In her letter of recommendation to DAC, the South Australian Government Architect advised:

In principle, I support the diversity of uses for the development, the public realm improvements and the intent to create a gateway building to The Parade precinct...

The surrounding context includes a number of residential dwellings and small scale commercial properties, as well as a number of State and Local Heritage Places surrounding The Parade and Portrush Road intersection...

The building has an overall above-ground height of 38.15m to the highest point of the facade. Given the existing low scale of adjacent properties and general character of the area, the massing and apparent bulk of this development will present a significant contrast to the immediate context. As such, mitigating the impact of the proposed height and massing will be essential to the success of the proposal. I recommend further consideration of the upper level cantilevered facade, its geometry and visual impact on the site's landmark corner location...

The building area proposes floor to floor levels of 4.2m to the five levels of the development above the car park levels. While I support the provision of generous ceiling heights, the accumulated overall height adds bulk to the building form. I recommend further consideration of the ceiling heights to successfully integrate the services requirements while maintaining amenity for the office areas...

The current architectural expression to the podium aims to achieve an identity that reflects the unique location of the site within a heritage precinct. and is represented as two elements contrasting in material and expression. The podium is characterised by a horizontally proportioned form that is clad in sandstone. Further design detail refinement is anticipated as the project progresses, with particular reference to the podium cladding detail, Bowen Street interface as well as any necessary secondary structure required by the proposed façade treatment.

The upper levels of the development are set back from the podium edge and are characterised by a folded and frilled glass facade with the intent to reduce the mass and bulk of the proposal and reference the verticality and angle of the church spire. In my opinion, the detailing of the facades is critical to a successful design outcome that is commensurate with the distinctive location. I recommend further refinement of the facade treatments referencing the specific environmental factors of each elevation...

To ensure the most successful design outcome is achieved, the Minister may like to consider conditions or reserved matters to protect or ensure the following elements of the proposal:

- *Provision of additional details and materials sample board to demonstrate how the ambition for the facade treatments as outlined in the design statement is achieved in practice...*

5.0 Net Impact of Proposed Amendments

The net impact of the proposed amendments outlined in Section 1.0 of this HIA Supplement are:

- The overall height of the proposal has been reduced by 3800mm;
- The building's podium has been reduced in height from four storeys to three storeys;
- Additional finishes and material images have been provided (SK47) with typical images of proposed sandstone façade treatments, fritted glazing, expressed steel reveals to windows and sandstone coloured expressed fins.

The net effect of these changes is a reduction in the overall physical and visual bulk and scale of the proposed development. In turn, these amendments have also reduced any impacts on State and Local Heritage places, and the adjoining Residential Historic (Conservation) Zone (Bowen Street) as follows:

5.1 State Heritage Impacts

The fundamental design response has remained consistent with the original DAC application, in that it:

- establishes a visually strong podium base (or more monolithic fine grained character), and visually 'lighter' upper levels;
- The use of a 'flowing veil' upper façade skin visually softens the upper storeys, and creates a contrasting backdrop to the strong geometric forms of the Clayton Wesley Church spire when viewed from the north;
- The overall articulation, and careful use of materials, significantly mitigates the overall visual bulk and scale of the proposal in the context of its immediate surrounds.
- The approach to the material selection on the project greatly contributes to its integration into the existing streetscape, particularly with regards to the identified State Heritage places, and the mitigation of the proposal's overall visual bulk and scale. The additional materials and finishes information is consistent with this.

While the proposal will remain a notable element within the streetscape, the reduced height and associated adjusted proportion will lessen its visual prominence, and any associated impacts to the context of the nearby State Heritage places.

5.2 Local Heritage Impacts

As noted in my original HIA, Local Heritage impacts are largely negligible, with only two adjacent Local Heritage places, both of which are remnant former residential buildings. The Development Plan seeks proposals adjacent such places to demonstrate design consideration of their relationship with the heritage place. These provisions apply to both State and Local Heritage places, however for reasons noted in my original assessment, I consider the State Heritage response to take precedent.

In responding to the State Heritage contextual issues, the design also demonstrated design consideration to the identified Local Heritage places through the selection of materials, mitigation of bulk and scale, and design references.

The proposed amendments remain consistent with this design response, while the reduced height (in particular of the podium) assist in the transition of scale between the proposal and surrounding single storey Local Heritage places.

5.3 Residential (Historic) Conservation Zone

As noted in my original assessment, character impacts on the adjacent Residential (Historic) Conservation are limited to the site's Bowen Street interface. As noted, the design response sought to lessen such impacts associated with a notable development of this size through the establishment of a clear podium level, material selections, general articulation and upper level setbacks.

The proposed amendments further mitigate such impact as a result of the reduced overall height of the proposed development, and in particular the building's podium. Once again, materials and finishes selections remain consistent with the original design intent.

6.0 Summary

Recent amendments to the proposed development at 270 The Parade Kensington Park have resulted in an overall reduction in the height of the proposal by 3800mm, and a reduction to the building podium from four storeys the three. These changes have had the net effect of reducing the overall physical and visual bulk and scale of the proposal, and in turn any State and Local Heritage impacts.

The reduction in scale (both physical and visual) has also further mitigated any potential impacts on character of the interfacing Residential Historic (Conservation) Zone across Bowen Street.

The additional materials and finishes information is also consistent with the original DAC application and Heritage Impact Assessment.



APPENDIX E
GHD ASSESSMENT REPORT



Peregrine Corporation
Transport, Access & Pedestrian
Impact Assessment Report
Peregrine Head Office
270 The Parade Kensington

February 2017

Executive summary

The following Report is to specifically address the transport, access and pedestrian requirement of the Development Assessment Commission's consideration of the preliminary development proposal.

This assessment included (among other matters) an investigation of the following;

“Guideline 4: The development proposes substantial new building works on a site affected by the Metropolitan Adelaide Road Widening Plan and is adjacent to a corridor identified within the Integrated transport and Land Use Plan as potentially being impacted by a new tram line.”

“Guideline 6: The proposal includes two new access points, one on The Parade in close proximity to the Portrush Road/the Parade signalised intersection and one on High Street in close proximity to the Portrush Road/High Street junction. In this regard, the proposal should not result in traffic impacts to the adjacent roads, or create road safety issues at or along the roads, particularly Portrush Road. The safe and efficient operation of Portrush Road and The Parade as well as the Portrush Road/The Parade intersection and the Portrush Road/High street junction must be maintained.”

Consequently, GHD has identified the potential road widening and/or setback requirements necessary to facilitate future road improvements at this location with particular emphasis on public transport projects identified in ITLUP.

Traffic volumes on The Parade within this particular area range between 16,800 AADT and 13,900 AADT although the expected growth rate at around 2031 could result in The Parade traffic volumes changing to 11,500 and 14,700 AADT respectively (source: DPTI). The overall cross sectional capacity of the eastern end of The Parade has also been a determining factor in which of the Tram options could ultimately adopted.

Based upon the information obtained and considered by GHD it is considered the adoption of an eight (8) metre wide segregated Tram Path is not warranted east of Portrush Road and the “Gauntlet” Tram (one lane width) running also has considerable constraint in platform design and dual track sections to enable opposing trams to pass each other. It is however, recommended that Shared (Tram/ Vehicle) running lanes of 3.5 m be considered further.

Accordingly, it is recommended that Peregrine Corporation allow for generally a 4.5m road widening adjustment to The Parade boundary of the site, subject to DPTI support for the proposed development within the current Portrush Road boundary.

GHD has also evaluated the traffic impact of the development on the surrounding road network by undertaking traffic analysis and modelling of the proposed access points and the affected road intersections/junctions (ie. Portrush Road/The Parade intersection and Portrush Road/High Street junction).

An evaluation of the adequacy of the existing pedestrian facilities along Portrush Road and The Parade has also been concluded and identification of improvements included within the building setback and design. The proposed design strengthens the link with the “Main Street Shopping/Business Precinct” on the western side of the Portrush Road.

As a related but separate project, a commitment has been made with the City of Norwood Payneham and St Peters to refurbish Bowen Street into a pedestrian friendly “Shared Space” with a low traffic speed environment and significant improvements for pedestrian safety.

GHD considers the MPH design significantly improves pedestrian safety and amenity. An assessment of the proposed parking arrangements has also been assessed and is discussed in the following report.

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Appendix A Sketch Plans & Turning Profiles

1. Project Background

1.1 Introduction

This section provides a brief overview of the project background and work to date.

1.2 Development Application

GHD Pty Ltd (GHD) has been engaged by Peregrine Corporation Pty Ltd (Peregrine), to prepare a traffic impact assessment to support its development application associated with a proposed site redevelopment of the Peregrine Headquarters at the Portrush Road and The Parade intersection, Kensington.

1.3 Existing Site Operations

The existing 4296m² Office and Warehouse accommodation includes provision for 310 staff members and additional Meeting Room space of 156m² and Training Rooms of 228m².

Two separate parking areas are available at the site, a small visitor parking area of six (6) spaces in the north-west corner of the property accessed via Portrush Road and another car park of forty-one (41) spaces in the northeast corner of the site accessed via Bowen Street.

Truck deliveries are currently made via Bowen Street.

1.4 Development Proposal

It is proposed (by the developer) that:

1. The existing Office will be demolished and replaced with a new six level integrated offices / commercial building including training, gymnasium, retail, café and restaurant facilities.
2. Car parking is proposed over three levels including provisions for people with disabilities;
3. Motor cycle parking and “End of Trip” bicycle parking facilities have also been included;
4. Streetscape improvements are also proposed to Portrush Road and The Parade;
5. Primary vehicular access arrangements will be via entries at High Street and The Parade together with a secondary ‘service area’ accessed to Bowen Street.

1.5 Scope and limitations

This report: has been prepared by GHD for Peregrine Corporation and may only be used and relied on by Peregrine Corporation for the purpose agreed between GHD and Peregrine Corporation, including the tabling of this information with relevant Government Agencies.

GHD otherwise disclaims responsibility to any person other than Peregrine Corporation arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described throughout this report. GHD disclaims liability arising from any of the assumptions being incorrect.

Investigations undertaken in respect of this report are constrained by the particular site conditions, such as the location of buildings, services and vegetation. As a result, not all relevant site features and conditions may have been identified in this report.

Site conditions (including the presence of hazardous substances and/or site contamination) may change after the date of this Report. GHD does not accept responsibility arising from, or in connection with, any change to the site conditions. GHD is also not responsible for updating this report if the site conditions change.

GHD has prepared this report on the basis of information provided by Peregrine Corporation and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

2. Existing Traffic Conditions

2.1 Introduction

This section sets out the existing traffic conditions in the vicinity of the subject site. Data collected about the existing conditions has been sourced from DPTI, Council and a site visit on 6 May 2016 by GHD.

2.2 Site Location

The site is known locally as 270 The Parade Kensington, South Australia as shown in Figure 1.



Figure 1 Site Locality Plan (Source Google Maps 2016)

2.3 Road Network

Portrush Road functions as an Arterial Road and is managed and maintained by the Department of Planning, Transport and Infrastructure (DPTI) and is configured as follows:

- Dual southbound traffic lanes of (3.3 m) & (3.0 m) and northbound traffic lanes (3.3 m) and (3.0 m), governed by the speed limit of 60 km/h;
- Segregated right turn lanes (3.0 m) at The Parade intersection;
- Segregated right turn lane (3.0 m) within a raised median at the High Street intersection;
- Bicycle Lanes (1.2 m) on Portrush Road with associated full time parking restrictions;
- Footpath paving adjacent to the site is full depth of kerb to boundary;

The Parade (West) also functions as an Arterial Road and is managed and maintained by the Department of Planning, Transport and Infrastructure (DPTI) and is configured as follows:

- Dual eastbound traffic lanes of (3.0 m) & (3.0 m) and a left turn slip lane for northbound vehicle movements of (4.6 m);
- Dual westbound traffic lanes (3.0 m) and (3.0 m), governed by the speed limit of 50 km/h;
- A raised median of 0.5 m at the Portrush Road intersection that expands to 3.3 m west of Cairns Street;
- Footpath paving on both corner quadrants exists between the full depth of kerb to boundary;

The Parade (East) functions as a Secondary Arterial Road which is managed by the City of Norwood Payneham & St.Peters (NPSP) and is configured as follows;

- Dual eastbound traffic lanes of (3.0 m) & (3.6 m) and a left turn slip lane for southbound vehicle movements of (4.6 m);
- Dual westbound traffic lanes (3.1 m) and (3.0m), governed by the speed limit of 60 km/h;
- A raised median of 0.5 m at the Portrush Road intersection;
- Footpath paving on both corner quadrants exists between the full depth of kerb to boundary;

The intersection of Portrush Road and The Parade is controlled by traffic signals.

High Street is a local road under the control and management of Council (NPSP) and is configured as follows;

- Single traffic lanes (4.8 m) & (4.8 m) in each direction, governed by the urban speed limit of 50km/h;
- Footpath paving exists on both corner quadrants the full width of kerb to boundary.

Bowen Street is also a local road under the control and management of Council (NPSP) and is configured as follows;

- A single traffic lane (5.8m) in the north-eastbound direction, governed by the urban speed limit of 50km/h;
- Footpath paving exists on both corner quadrants between the kerb and boundary.

2.4 Existing Site Access and Egress

Access to the site is currently via existing inverts and crossovers on Portrush Road and Bowen Street.

The Portrush Road access driveway links to an existing car park for visitors accommodating six (6) spaces used as the primary visitor entry.

Bowen Street is a “one way” road, which provides access to a staff carpark of forty-one (41) spaces and connects to an adjacent Peregrine Corporation site used as a storage/delivery and logistics property.

Pedestrian entry points for the general public are restricted to the main foyer off The Parade / Portrush Road supplemented with authorised staff access permitted to entry points off Bowen Street, The Parade and High Street.

2.5 Existing Traffic Volumes

Recorded traffic volume information has been obtained from DPTI and Council which has revealed the following;

- Portrush Road, north of Kensington Road annual average daily traffic 36,400 including (7% Commercial Vehicles) (Source: DPTI 2015);
- Portrush Road, south of Magill Road annual average daily traffic 36,700 including (7% Commercial Vehicles) (Source: DPTI 2015);
- The Parade, east of Portrush Road annual average daily traffic 13,200 including (3.5% Commercial Vehicles) (Source: DPTI 2015);
- The Parade, west of Portrush Road annual average daily traffic 16,400 including (2.8% Commercial Vehicles) (Source: DPTI 2014);
- Bowen Street, north of High Street 300 vehicles per day (Source: Council April 2005);
- High Street, east of Bowen Street 1500 vehicles per day (Source: Council April 2005);

Note: No recent traffic volumes were available for Bowen Street and High Street. As such, a 10% growth was added to each street and an extra 10 trips per day for each residential property on Bowen Street was added. Therefore, the annual average daily traffic count used for Bowen Street was 510 vehicles per day and 1650 vehicles per day for High Street.

2.6 Crash History Portrush Road / The Parade

Road crash data for the last complete five (5) year period has been obtained from DPTI (SA Map Viewer) for the area including the intersections of Portrush Road / The Parade; Kensington Park.

Table 1 Crash history for the intersection of The Parade and Portrush Road

Crash History 2010 - 2015									
Location	PDO	Injury	Rear End	Right Turn	Right Angle	Side Swipe	Hit Fixed Object	Hit Pedestrian	Other
Centre of Intersection	40	12	30	12	4	4	0	0	2
Portrush Road (North)	9	3	7	0	1	3	0	1	0
Portrush Road (South)	1	1	1	0	0	1	0	0	0
The Parade (East)	2	2	3	0	0	0	1	0	0
The Parade (West)	1	0	1	0	0	0	0	0	0
Total	53	18	42	12	5	8	1	1	2

Seventy-one 71 crashes were recorded at the intersection of Portrush Road and The Parade during the five (5) year period between 2010 and 2015. The majority of the crashes were 'rear end' collisions with 42 and the second highest crash type of 'right turn' with a total of 12.

Future remodelling of this intersection to account for the installation of a tram service should take the frequency and prevalent crash type into account in designing the lane and traffic signal phasing changes.

2.7 Crash History Portrush Road / High Street

Assessment of crash records has revealed that there has been three (3) crashes associated with this junction however, it is also noted that these crashes may have been caused by the conflict created with the right turn lane into High Street and the right turn lane into The Parade.

One of the crashes occurred during night time conditions and was within the right turn lane directly opposite High Street, classified as a “hit fixed object” that resulted in property damage only (PDO). The two remaining crashes both occurred during day time conditions and resulted in PDO. One of the crashes was a “rear end” and the other was a “side swipe” with both occurring within the right turn lane into High Street.

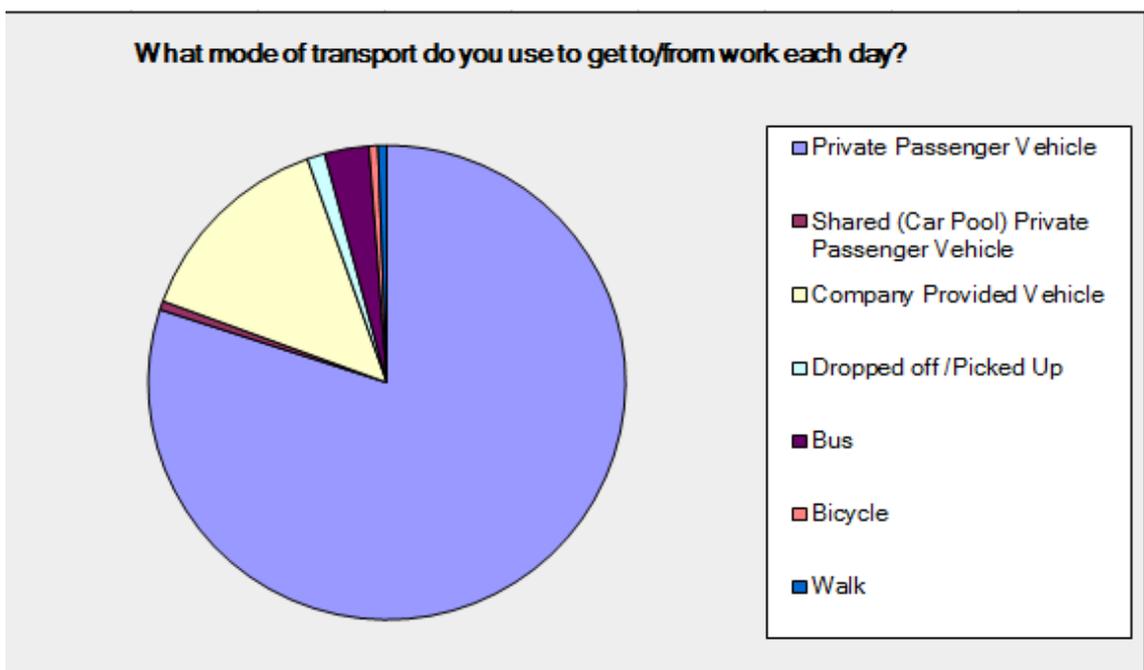
As the crash numbers at the intersection of High Street and Portrush Road are generally low, no conclusions can be drawn from the crash data.

2.7 Existing Staff Travel Patterns

As part of the collection of data related to the existing travel patterns Peregrine Corporation arranged to survey the existing transport mode, timing and orientation of staff movements to and from work during April 2016.

Of the 310 staff 164 responded representing a solid 53% return rate with the following results;

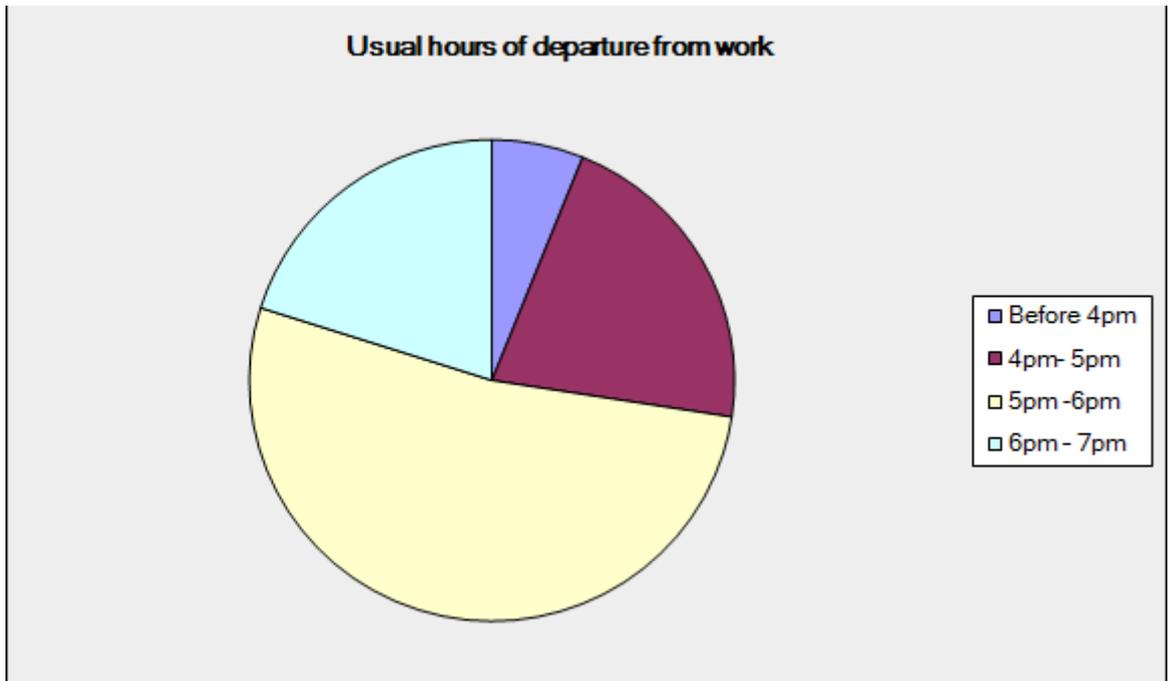
What mode of transport do you use to get to/from work each day?		
Answer Options	Response Percent	Response Count
Private Passenger Vehicle	79.9%	131
Shared (Car Pool) Private Passenger Vehicle	0.6%	1
Company Provided Vehicle	14.0%	23
Dropped off /Picked Up	1.2%	2
Bus	3.0%	5
Bicycle	0.6%	1
Walk	0.6%	1
Comments - Note any variations to this pattern (days and time)		15
	<i>answered question</i>	164
	<i>skipped question</i>	0



Usual hours of arrival to work		
Answer Options	Response Percent	Response Count
before 8am	53.0%	87
8am- 9am	40.2%	66
After 9am	6.7%	11
<i>answered question</i>		164
<i>skipped question</i>		0



Usual hours of departure from work		
Answer Options	Response Percent	Response Count
Before 4pm	6.1%	10
4pm- 5pm	21.3%	35
5pm -6pm	52.4%	86
6pm - 7pm	20.1%	33
<i>answered question</i>		164
<i>skipped question</i>		0



Route used to arrive at/depart from work?

Answer Options	Response Percent	Response Count
Generally East of the Peregrine site via The Parade	22.7%	37
Generally North of the Peregrine site via Portrush	39.3%	64
Generally West of the Peregrine site via The Parade	13.5%	22
Generally South of the Peregrine site via Portrush	24.5%	40
answered question		163
skipped question		1

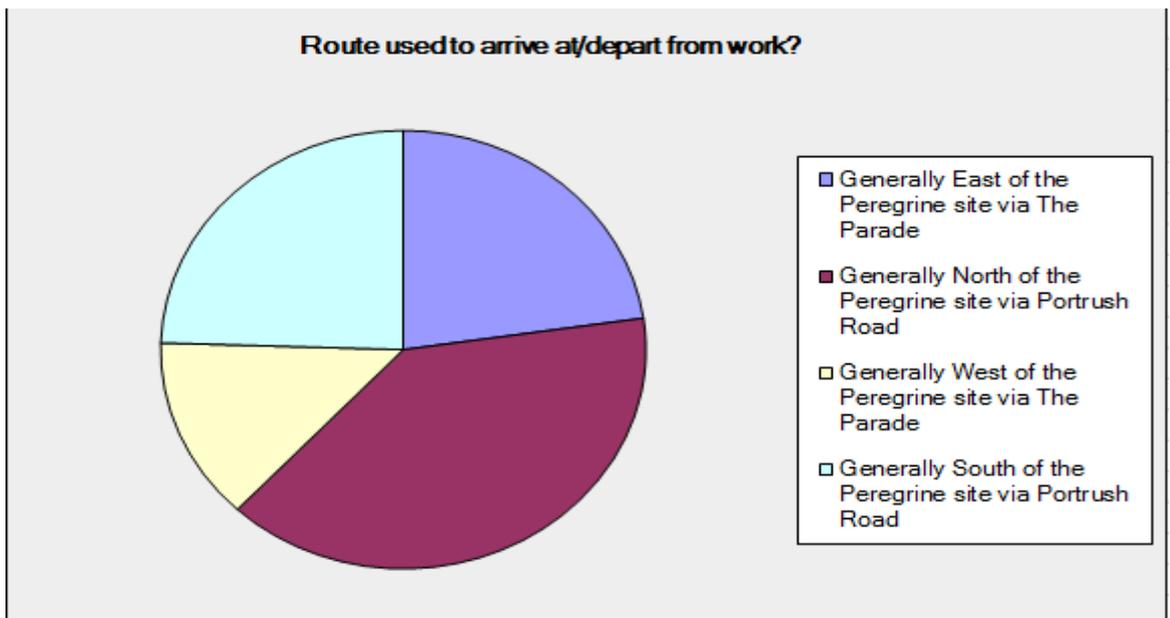


Figure 2 Existing Staff Travel Patterns (Source Peregrine Corporation 2016)

2.8 Video Traffic Surveillance

Vehicle turning movements (during 'peak hour' traffic flow) related to access and egress to the existing Peregrine Head Office was conducted using video surveillance on Thursday 10 March 2016 (am) and Friday 11 March 2016 (pm).

Camera equipment was set up at the intersection of Portrush Road / The Parade, Portrush Road / High Street and Bowen Street / The Parade, Kensington.

Key findings:

- During 8.00 – 9.00 am there were 120 right turn movements out of The Parade (West) and 34 of these vehicles turned left into High Street;
- During 7.30 - 8.30 am there were 36 right turns and 83 left turns from Portrush Road into High Street;
- During the same period 149 left turns out of High Street into Portrush Road;
- Between 8.00 – 9.00 am 32 vehicles turned left out of Bowen Street and 6 turned right into The Parade;
- During 4.00 – 5.00 pm there were 163 right turn movements out of The Parade (West) and 19 of these vehicles turned into High Street;
- During 5.00 – 6.00 pm there were 63 right turns and 38 left turns from Portrush Road into High Street;
- During the same period 74 left turns out of High Street into Portrush Road; and
- Between 4.00 – 5.00 pm 26 vehicles turned left out of Bowen Street and 5 turned right into The Parade.

Figure 3 details a summary of the video survey results.



Movement									
AM Peak	86	34	134	36	149	30	0	6	32
PM Peak	144	19	38	63	74	0	10	5	26

Figure 3 Austraffic Pty Ltd Video Surveillance Survey 2016

3. Projected Traffic Generation

3.1 Traffic Generation of Proposed Development

To establish the traffic generation rates for the proposed development reference has been made to the NSW Roads and Traffic Authority (RTA) “Guide to Traffic Generating Development (2002)”

- This source recommends the following traffic generation rates;
- “Office/ Commercial Premises – Daily traffic generation rate of 10 trips per 100 m² of GFA and evening peak hour (5pm – 6pm) of 2 trips per 100 m² GFA”;
- “Retail less than 10,000 m² - Daily traffic generation rate of 121 trips per 100 m² of GFA and peak hour (4.30 pm -5.30 pm Friday and 11am-12 noon Saturday) of 12.5 trips per 100 m² GFA”;
- “Restaurant – Daily traffic generation rate of 60 trips per 100 m² of GFA and peak hour of 5 trips per 100 m² GFA”;
- “Gymnasium - Daily traffic generation rate of 20 trips per 100 m² of GFA and evening peak hour (6pm – 7pm) of 3 trips per 100 m² GFA”;

Based upon the MPH Architects design 1465 dated 16/01/2017 the projected traffic generation has been summarised in Table 2;

Table 2 Traffic Generation Projections for Proposed development

Land Use Activity	Daily Generation	Peak Hour	Peak Hour Generation
Office / Commercial (7620m ²)	10 trips /100m ² = 762 trips	5 pm – 6 pm Mon -Fri	2 trips / 100m ² =152 trips
Retail (Est 70% of 1060m ² = 742m ²)	121 trips /100m ² = 898 trips	4.30 pm – 5.30 pm Mon – Fri & 11 am – 12 noon Sat	12.5 trips /100m ² =93 trips
Café (Est 30% of 1060m ² = 318m ²)	60 trips / 100m ² = 191 trips	12 noon – 1pm Mon - Fri	5 trips per 100m ² =16 trips
Restaurant/deck (515m ² plus 235m ²)	60 trips / 100m ² = 450 trips	7pm – 8 pm Saturday	5 trips per 100m ² =38 trips
Training Rooms (520m ²) Theatrette (225m ²)	10 trips /100m ² = 762 trips	10 am -2 pm Mon - Friday	2 trips / 100m ² =15 trips
Meeting Rooms (1905m ²)	10 trips /100m ² = 191 trips	10 am -2 pm Mon - Friday	2 trips / 100m ² =38 trips
Gym/Pool/Spa (910m ²)	20 trips / 100m ² = 182 trips	6 pm – 7 pm Mon -Friday	3 trips / 100m ² = 27 trips.

Land Use Activity	Daily Generation	Peak Hour	Peak Hour Generation
Accommodation (815m ²)	0 trips / 100m ² (very rare international business partners' short term stay)	n/a (very rare international business partners' short term stay)	0 trips / 100m ² = 0 trips.
Estimated Total	3436 daily trips		5pm – 6pm M-F (152 + 50% of 93) = 199 trips

Note: The 815 m² accommodation area is for very rare international business partners' short-term stay and has not been included within the above figures as it will not generate frequent residential or hotel style traffic movements.

3.2 Traffic Generation of Existing Peregrine Offices

Notably the existing site does not include the retail, restaurant and/or gymnasium however, a similar application of the RTA parameters to the existing site activity would equate to the following;

- Existing total Office / Commercial GFA is 4680 m²;
- Daily traffic generation rate of 10 trips per 100 m² would equate to 468 daily vehicle trips;
- Evening Peak Hour (5pm – 6pm) of 2 trips per 100 m² GFA equals 94 trips.

3.3 Traffic Circulation

Traffic circulation at the site is projected to remain as a predominantly anticlockwise rotation based upon median restrictions affecting turning movements and the Bowen Street 'one way' orientation heading north. The existing driveway crossovers in Bowen Street and High Street will be closed with new facilities to be constructed to cater for the swept path of vehicles entering the car park areas. Access and egress will also be available via The Parade, which is restricted by an existing median that will mean access will be via left in and left out vehicle movements.

Access to the site for heavy rigid vehicles used for refuse collection will be via Bowen Street and include a parallel parking area just north of the car park access to enable waste transfer from the enclosure in the northeast corner of the site.

The position of these driveway crossovers and the location of fixed objects within the site have been assessed against road safety requirements and for clear unobstructed access and egress by a B99 passenger vehicle using the car park and a 12.5 m Heavy Rigid Truck potentially collecting waste. Analysis of the turn paths is provided as part of Appendix A.

B99 passenger vehicle movements both through and within the car park have also been assessed and are detailed in Appendix A.

3.4 Projected Traffic Growth

DPTI modelling for the projected overall traffic growth rate of Portrush Road and The Parade indicates an expectation of Portrush Road increasing from 36,400 AADT (2016) to 40,500 AADT (2031) and The Parade, which presently has 13,900 AADT (2016) decreasing to 11,500 AADT (2031).

Subject to resolution of the alignment and functional design of the proposed tram corridor on The Parade the above traffic growth figures may vary.

3.5 Staff Traffic Distribution Survey

Traffic circulation patterns derived from a recent 2016 staff travel survey as described in Section 2.7 are another indication of the existing office /commercial traffic distribution.

The results of that staff survey have been analysed and applied to the projected am and pm peak period movements as the access and egress arrangements will fundamentally mean orientation to the site will be very similar to the existing. Details of the predicted staff vehicle movements are shown in Figure 4 and Figure 5.



Figure 4 Predicted Staff Traffic Distribution AM Peak



Figure 5 Predicted Staff Traffic Distribution PM Peak

3.6 Projected Traffic Distribution

The implications of the site design parameters, management controls proposed by the recommendations, together with the current travel patterns has been considered and GHD has concluded the following assumed distribution of traffic associated with the site redevelopment;

Projected additional peak hour (5 pm -6 pm)_traffic = (199 projected – 94 existing = 105 vph)

- The Parade travelling east – estimated 23% or approximately 24vph;
- The Parade travelling west – estimated 13% or approximately 11vph;
- Portrush Road travelling south - estimated 25% or approximately 26 vph
- Portrush Road travelling north - estimated 39% or approximately 41 vph

Based upon the Sidra modelled intersection performance standard, the current intersection of Portrush Road and The Parade operates in the peak periods at a level of service classed as “F”.

Introducing the projected traffic generation rates the Sidra modelled intersection performance standard would remain operating at its current level of service classed as “F” during the peak periods.

4. Metropolitan Adelaide Road Widening Plan (MARWP) & Integrated Transport and Land Use Plan (ITLUP).

4.1 Major Development Requirement “Guideline 4”

As part of the Development Assessment Commission’s consideration of the preliminary proposal, it required the preparation of a Development Report that included (among other matters) an assessment of the following;

“Guideline 4: The development proposes substantial new building works on a site affected by the Metropolitan Adelaide Road Widening Plan and is adjacent to a corridor identified within the Integrated transport and Land use Plan as potentially being impacted by a new tram line.”

Consequently, GHD has identified the potential road widening and/or setback requirements necessary to facilitate future road improvements at this location with particular emphasis on public transport projects identified in ITLUP.

4.2 MARWP Requirements

The Metropolitan Adelaide Road Widening Plan Act 1972 was established to provide the State Government with the authority to control development adjacent to critical arterial roads. To provide for future demands a network plan has been prepared which in this case has an impact on the Portrush Road and The Parade boundary alignments.

The Metropolitan Adelaide Road Widening Plan (MARWP) has been reviewed and it has been determined that a strip of land up to 4.5 m in width may be required from the existing Portrush Road property boundary.

Additionally, land is also potentially required from the Portrush Road/The Parade corner for the possible future upgrade of the Portrush Road and The Parade intersection.

It should also be noted that the consent of the Commissioner of Highways is also required for all new building works located on or within 6.0 m of an Arterial Road affected by MARWP.

This requirement does not include The Parade east of Portrush Road.

4.3 ITLUP Requirements

As part of the State Government’s vision for transport improvements across the Adelaide Metropolitan Region, it considers that a tram to the eastern suburbs will form part of a new tram network across Adelaide called “AdeLINK”. This strategy is one important element in the South Australian Government’s draft Integrated Transport and Land Use Plan (ITLUP). Within “AdeLINK” the tram to the east will be known “EastLINK” and its proposed route is planned to travel along The Parade (including adjacent to the existing Peregrine Head Office and therefore the site proposed for redevelopment).

To accommodate the movement of trams, buses and general traffic through Portrush Road and The Parade the State Government proposes significant upgrading of the intersection of these roads. While at this stage this is a proposal, the ITLUP has identified the implementation timeframe for EastLINK as within the medium term (5 to 15 years).

Attributes of the planned upgrades for The Parade and the Portrush Road/The Parade Intersection as identified by DPTI do not at this stage include a new bus or tram stop within the vicinity of the Peregrine Head Office redevelopment.

DPTI has however determined that the future road requirements for The Parade and Portrush roads (as identified in ITLUP) would maintain the existing north and south lanes on Portrush Road. It has also resolved to change the western approach lanes to include the tram lane, left turn island with left turn lane similar to existing and the east approach lanes similarly including the tram lane, lane, left turn island with left turn lane extending along northern side of Peregrine site.

4.4 Tram Options for The Parade East

4.4.1 Separated Tram Running

In this scenario, the tram is proposed to be operated within its own “right of way” separated from other traffic. The overall tram path width is required to be 8 m, similar to the existing King William Street tram path (refer Figure 6)

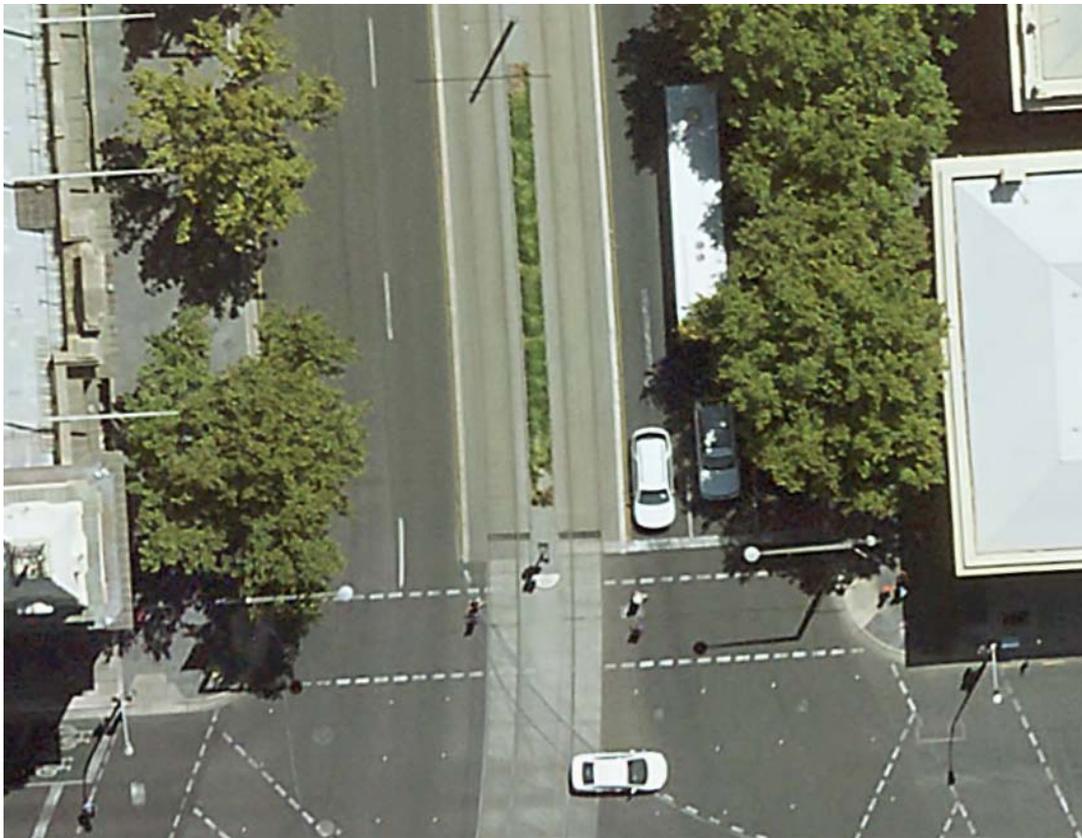


Figure 6 Existing King William Street Tram corridor

Current DPTI practice is for any adjacent standard traffic lane to be 3.5 m however; 3.3 m can be supported in lower speed environments.

The implications for separated tram running on the cross section of the intersection and nearby environs have been detailed in Appendix A.

4.4.2 Single Track (Gauntlet) Tram Running

In this scenario, the tram is proposed to be operated within its own separated path from other traffic however, in a short section (500m) of single-track system designed for two-way movement. The tram path width in this example is required to be 4 m, although there are no typical schemes which are local examples.

Current DPTI practice is for any adjacent standard traffic lane to be 3.5 m. However, 3.3 m can be supported in lower speed environments.

The implications for single track (Gauntlet) tram running on the cross section of the intersection and nearby environs have been detailed in Appendix A however it is not considered the most feasible option for the eastern segment of The Parade.

4.4.3 Shared (Tram / Vehicle) Running

In this scenario, the tram is proposed to be operated within the traffic lanes shared with other traffic. The overall tram path width is required to be 5.0 m, similar to the existing King William Street (south of Victoria Square) shared lane.



Figure 7 Shared Tram / Vehicle Running

Current DPTI practice is for any adjacent standard traffic lane to be 3.5. However, 3.3 m can be supported in lower speed environments.

The implication for shared tram/ vehicle lane running on the cross section of the intersection and nearby environs has been detailed in Appendix A

4.4.4 Tram Considerations and Conclusions

Traffic volumes on The Parade within this particular area range between 16,800 AADT and 13,900 AADT. The DPTI expected negative growth rate of approximately 8% at around 2031 could result in The Parade traffic volumes changing to 11,500 and 14,700 AADT respectively (source: DPTI). Projected traffic volumes in this range can be satisfactorily accommodated within single lanes in each direction, supplemented with bicycle lanes and occasional parallel parking.

The overall cross sectional capacity of the eastern end of The Parade will be the determining factor in which of the Tram options is ultimately adopted. The introduction of a segregated Tram path of 8 m for the length of this segment of The Parade will have significant impacts within the Parade / Portrush Road intersection and upon properties along this route and come at a considerable cost. It is therefore not considered feasible.

Based upon the above information GHD considers the adoption of an eight (8) metre wide segregated Tram Path is not warranted east of Portrush Road and the “Gauntlet Tram” running also has considerable constraint in platform design and dual track sections to enable opposing trams to pass each other. It is however, recommended that Shared (Tram/ Vehicle) Running lanes of 3.5 m be considered further.

Accordingly, it is recommended that the Peregrine Corporation allow for generally a 4.5m road widening adjustment to The Parade boundary of the site, subject to DPTI support for the proposed development within the current Portrush Road boundary.

Details of the projected allotment boundary are as provided in Appendix A.

5. Intersection Impacts

5.1 Major Development Requirement “Guideline 6”

As part of the Development Assessment Commission’s consideration of the preliminary proposal, it required the preparation of a Development Report that included (among other matters) an assessment of the following;

“Guide 6: The proposal includes two new access points, one on The Parade in close proximity to the Portrush Road/the Parade signalised intersection and one on High Street in close proximity to the Portrush Road/High Street junction. In this regard, the proposal should not result in traffic impacts to the adjacent roads, or create road safety issues at or along the roads, particularly Portrush Road. The safe and efficient operation of Portrush Road and The Parade as well as the Portrush Road/The Parade intersection and the Portrush Road/High street junction must be maintained.”

Consequently, GHD has evaluated the traffic impact of the development on the surrounding road network by undertaking traffic analysis and modelling of the proposed access points and the affected road intersections/junctions (ie. Portrush Road/The Parade intersection and Portrush Road/High Street junction).

5.2 Portrush Road / The Parade intersection impacts

5.2.1 SIDRA Analysis

A SIDRA analysis has been conducted on the intersection of Portrush Road and The Parade to determine the effects of any changes associated with the Peregrine development on the south eastern side of the intersection. To conduct this analysis turning movement counts, SCATS and MASTEM data were provided by DPTI to allow for modelling of future growth situations. This analysis was conducted on three different options that varied based on the different scenarios described in Section 4 involving the layout of the proposed tram network. The tram operation was not modelled for this analysis however the analysis in SIDRA did allow for the configuration of the tram along the eastern leg of The Parade by representing the space required by the tram with a solid median in SIDRA. For shared vehicular and tram operation the lane widths were based on existing situations within Adelaide. A gap acceptance of 3.5 seconds was also assumed for the purpose of modelling the intersection.

Table 3 lists the current condition of the intersection of Portrush Road and The Parade to use as a bench mark for comparison of all options explored.

Overall Intersection Operation			
Existing Conditions	Level of Service	Queue length (m)	Delays (s)
2016 AM Peak	F	1051.3	249.8
2016 PM Peak	F	546.9	170.9

Table 3 SIDRA analysis of the Existing Conditions

5.2.2 Option One Intersection Level of Service

Option one includes the addition of an 8 metre separated “Tram Zone” similar to the Tram line in Victoria Square. Either side of the Tram Zone will be a single lane of traffic in either direction with a width of 3.3 metres as well as a full time bike lane with a width of 1.5 metres. The main focus of this option is to assess the amount of space required on the eastern side of The Parade and the amount of road widening required. Figure 8 shows the function of the intersection with the provision of an 8 metre Tram Zone shown with a solid median island on the eastern and western leg of the intersection.

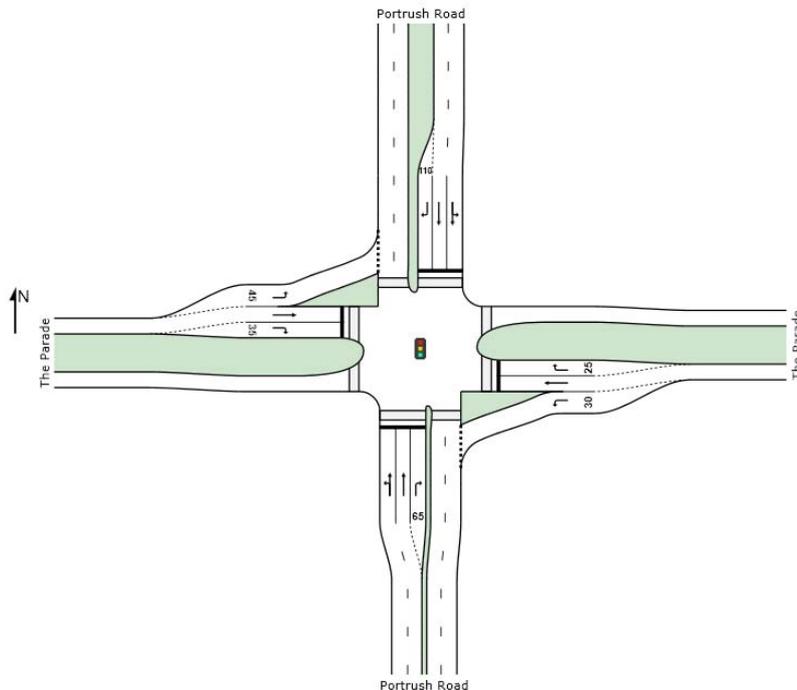


Figure 8 Option One as modelled on SIDRA (not to scale)

Table 4 shows a summary of the SIDRA results for the performance of the intersection both in the AM and PM peak. Predicted future growth volumes were provided by DPTI from MASTEM and have been applied to the intersection to determine how it would perform for the years 2021 and 2031 to assess the traffic impact. This model only allowed for space for the tram and did not consider the effects on the intersection with the tram in operation.

Table 4 Overall Level of Service Option One

Overall Intersection Operation				
Option One	Level of Service	Queue length (m)	Delays (s)	DOS
2016 AM Peak	F	1373.7	428.8	1.289
2016 PM Peak	F	905.9	346.8	1.215
2021 AM Peak	F	2150.2	636.2	1.428
2021 PM Peak	F	1790.2	912.3	1.677
2031 AM Peak	F	959.1	418.1	1.290
2031 PM Peak	F	1012.7	385.9	1.283

The SIDRA analysis of Option One showed a further increase in overall queue lengths and delays compared to the existing conditions. This option will not improve the overall level of service of the intersection. Based on the MASTEM data provided by DPTI the traffic volumes in 2031 will decrease compared to the 2021 volumes. As such it is predicted that the intersection will perform better in 2031.

Option one will retain the existing intersection layout with the addition of a centrally located 8.0 metre tram zone running along The Parade. The approach to the intersection on the eastern side of The Parade will be significantly changed to include 1.5 metre bike lanes, a 8.0 metre tram zone, 3.3 metre lane widths and the footpath widths will be retained on the northern side and reduced to 1.32 metres on the southern side. Figure 9 is a cross section of the eastern approach of the intersection. The total width of this configuration is 20.42 metres compared to an existing width of 15.6 metres as such this option will required 4.82 metres of road widening along The Parade East.

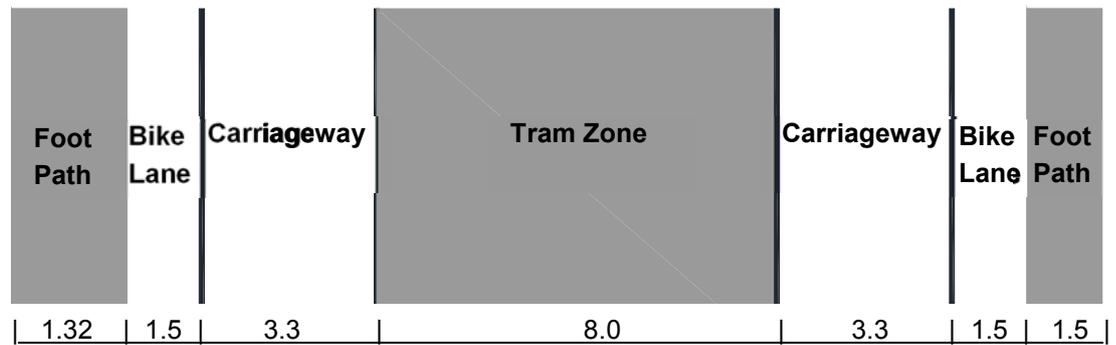


Figure 9 Required cross-section for Option 1 on the eastern approach on The Parade prior to the intersection

5.2.3 Option Two Intersection Level of Service

Option two includes the addition of a 4 metre separated “Tram Zone” that will operate as a shared track for the eastern portion of The Parade. This option has been included to reduce the amount of space required along The Parade and is reliant on the tram widening into a larger space further down the track to allow for the tram to manoeuvre and permit another tram to travel in the opposite direction. Either side of the Tram Zone will be a single lane of traffic in either direction with a width of 3.3 metres as well as a full time bike lane with a width of 1.5 metres. The main focus of this option is to assess the amount of space required on the eastern side of The Parade and the amount of road widening required. Figure 10 shows the function of the intersection with the provision of a 4 metre Tram Zone shown with a solid median island on the eastern and western leg of the intersection.

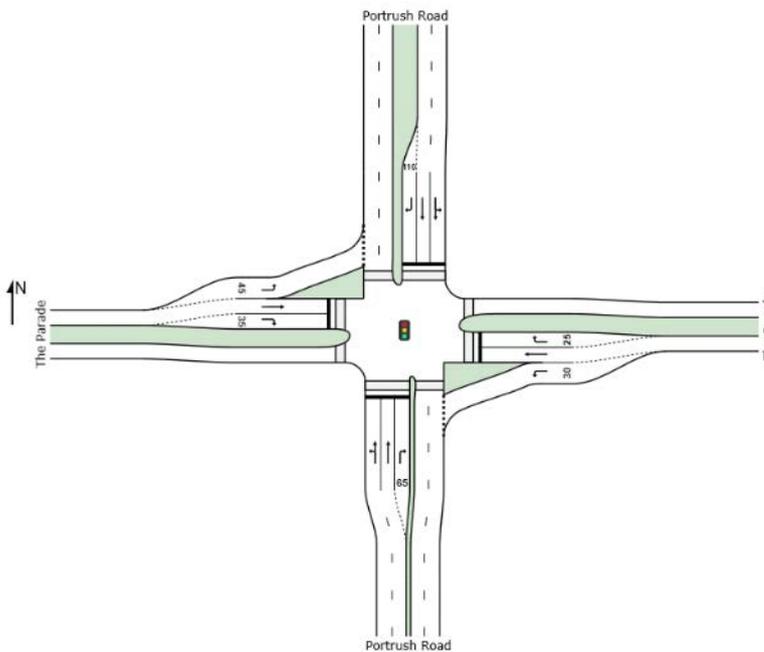


Figure 10 Option Two as modelled on SIDRA (not to scale)

Table 5 shows a summary of the SIDRA results for the performance of the intersection both in the AM and PM peak. Predicted future growth volumes were provided by DPTI from MASTEM and have been applied to the intersection to determine how it would perform for the years 2021 and 2031 to assess the traffic impact. This model only allowed for space for the tram and did not consider the effects on the intersection with the tram in operation.

Table 5 Overall Level of Service Option Two

Overall Intersection Operation				
Option Two	Level of Service	Queue length (m)	Delays (s)	DOS
2016 AM Peak	F	1373.7	428.8	1.289
2016 PM Peak	F	905.9	377.4	1.244
2021 AM Peak	F	2150.2	636.2	1.428
2021 PM Peak	F	1790.2	912.3	1.677
2031 AM Peak	F	959.1	418.1	1.290
2031 PM Peak	F	1012.7	385.9	1.283

The SIDRA analysis of Option Two showed a further increase in overall queue lengths and delays compared to the existing conditions. This option will not improve the overall level of service of the intersection. Based on the MASTEM data provided by DPTI the traffic volumes in

2031 will decrease compared to the 2021 volumes. As such it is predicted that the intersection will perform better in 2031.

Option Two will retain the existing intersection layout similar to Option One however the tram zone will only be 4.0 metres. As the tram zone will only allow room for one track the operation of the tram at this point will be shared for both directions. The approach to the intersection on the eastern side of The Parade will be significantly changed to include 1.5 metre bike lanes, a 4.0 metre tram zone, 3.3 metre lane widths and the footpath widths will be 1.5 metres on the northern side and the southern side will vary. Figure 11 is a cross section of the eastern approach of the intersection. The total width of this configuration is 20.42 metres compared to an existing width of 15.6 metres as such this option will required 4.82 metres of road widening along The Parade East.

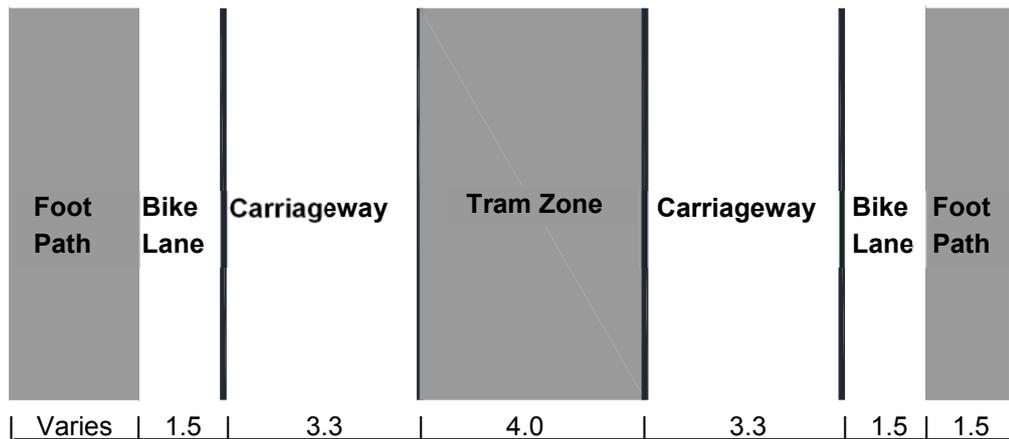


Figure 11 Required Cross section for Option 2 on the Eastern approach on The Parade prior to the intersection

5.2.4 Option Three Intersection Level of Service

Option Three includes one lane of traffic in either direction which function as a “Shared Running” lanes for vehicles and trams in a similar style to that of King William Street (South), Adelaide. The lane widths of the shared lanes are to be 5.0 metres wide with a bike lane on either side of the road with a width of 1.5 metres. Figure 12 shows the function of the intersection with the provision of a Tram Zone for the western leg of the intersection shown with a solid median island.

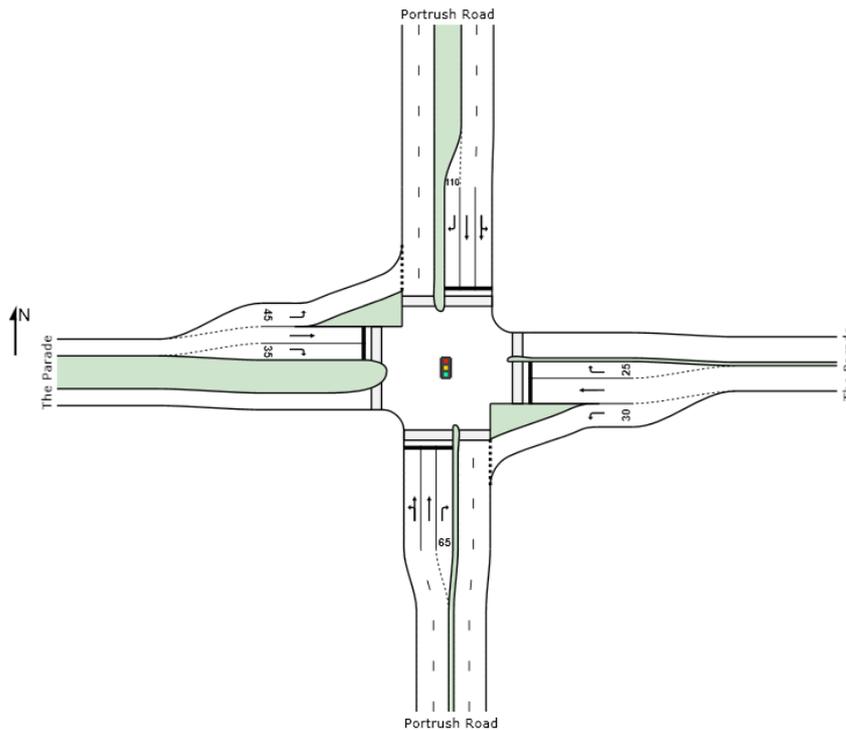


Figure 12 Option Three as modelled on SIDRA (not to scale)

Table 6 shows a summary of the SIDRA results for the performance of the intersection in the AM and PM peak. Predicted future growth volumes were provided by DPTI from MASTEM and have been applied to the intersection to determine how it would perform for the years 2021 and 2031 to assess the traffic impact. This model only allowed for space for the tram and did not consider the effects on the intersection with the tram in operation.

Table 6 Overall Level of Service Option Three

Overall Intersection Operation				
Option Three	Level of Service	Queue length (m)	Delays (s)	DOS
2016 AM Peak	F	1308.8	387.6	1.257
2016 PM Peak	F	905.9	369.8	1.244
2021 AM Peak	F	2082.3	593.2	1.401
2021 PM Peak	F	1729.6	932.2	1.674
2031 AM Peak	F	900.7	390.4	1.272
2031 PM Peak	F	1012.7	382.3	1.266

The SIDRA analysis of Option Three showed a further increase in overall queue lengths and delays compared to the existing conditions. This option will not improve the overall level of service of the intersection. Based on the MASTEM data provided by DPTI the traffic volumes in 2031 will decrease compared to the 2021 volumes. As such, it is predicted that the intersection will perform better in 2031.

The approach to the intersection on the eastern side of The Parade will be significantly changed to include 1.5 metre bike lanes, one 5.0 metre lane in either direction and the footpath widths will be 1.5 metres on the northern side and the southern side will vary. Figure 13 is a cross section of the eastern approach of the intersection. The total width of this configuration is 20.42 metres compared to an existing width of 15.6 metres as such this option will require 4.82 metres of road widening.

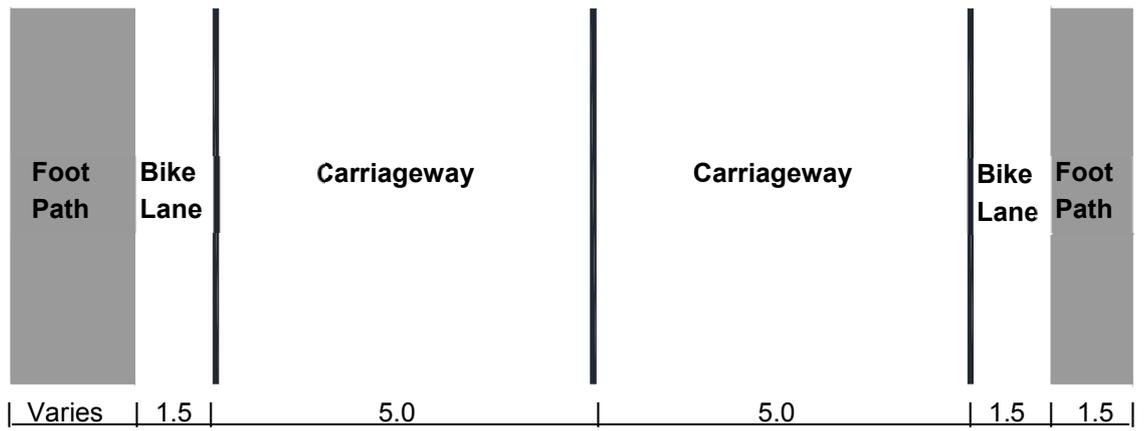


Figure 13 Required Cross section for Option 3 on the Eastern approach on The Parade prior to the intersection

5.3 Portrush Road / High Street Junction Impacts

5.3.1 SIDRA Analysis

A SIDRA analysis was conducted on the junction of Portrush Road and High Street in network with the signalised intersection of Portrush Road and The Parade (which is located approximately 60 metres north of High Street). To conduct this analysis turning movement counts were used to input the vehicle data for each movement through the intersection. Figure 14 is the network as modelled in SIDRA.

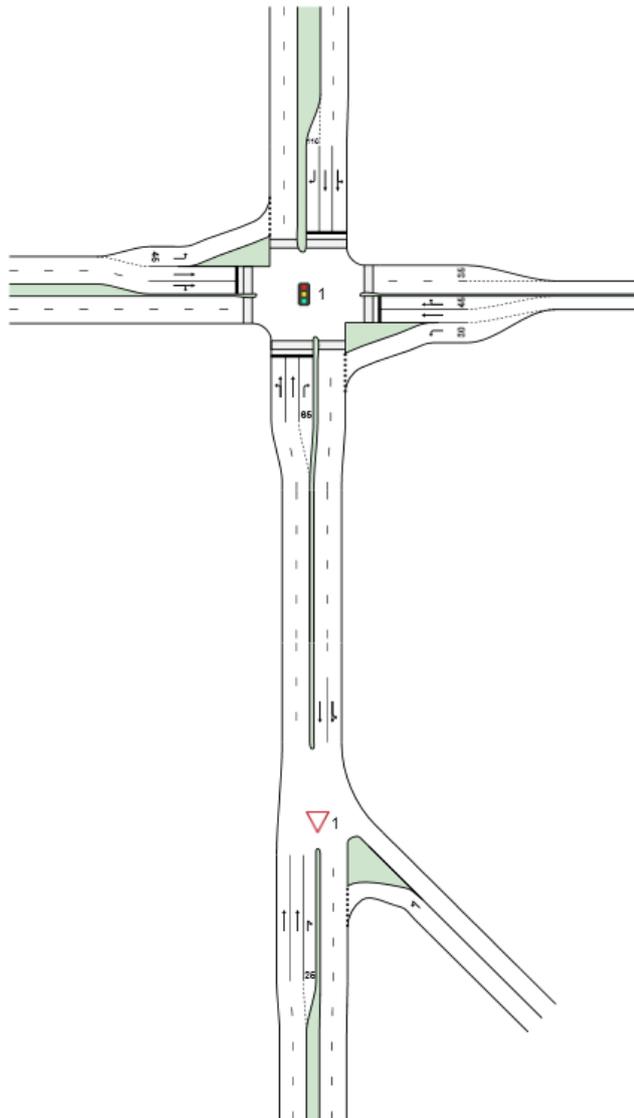


Figure 14 High Street Network with The Parade / Portrush Road

The turning movement counts were conducted in March 2016 over two (2) days with the AM and PM peaks measured on different days. The counts did not provide data for 'through' movements along Portrush Road; accordingly these movements were assumed to be the same as the 'through' movements along Portrush Road for north and southbound traffic (minus the turning movements into High Street).

The analysis has been conducted for three (3) different scenarios with the first being a representation of the existing conditions and then two (2) other scenarios for predicted future

growth situations in 2021 and 2031. A gap acceptance of 3.5 seconds was also assumed for the purpose of modelling the intersection.

Table 7 provides a summary of the Sidra Modelling findings;

Table 7 Summary of SIDRA Modelling AM and PM Peaks

Overall Intersection Operation				
High Street	Level of Service	Queue length (m)	Delays (s)	DOS
2016 AM Peak	A	597.5	0.9	1.157
2016 PM Peak	A	1083.1	0.8	1.085
2021 AM Peak	A	1588.0	1.0	1.329
2021 PM Peak	A	3643.4	0.8	1.562
2031 AM Peak	A	2197.9	1.8	1.253
2031 PM Peak	A	2062.1	1.3	1.206

5.4 Access Crossover Assessment

The proposed development includes the closure of existing vehicle access points and development of new locations specifically designed for the undercroft car parking access and egress via High Street and The Parade.

Secondary access to Bowen Street has also been included designed for Service Vehicle loading and unloading functions. It is also supported by a proposed loading bay within Bowen Street north of this access point.

Notably the High Street entrance has been positioned at the south-eastern extremity of the site to maximise the queuing potential within High Street, to minimise impacts on Portrush Road.

The Parade access driveway has also been positioned to similarly adhere to AS 2890 requirements in terms of setback from the respective intersections. To ensure right turn movements are prohibited it is proposed that closely spaced pavement bars will replace the existing solid centre line on The Parade between the Bowen street intersection and match into the existing median at the Portrush Road intersection. The driveway crossover has also been positioned to balance the position of a short term indented Taxi Zone / Loading Bay and the displacement from the start of the left turn slip lane into Portrush Road.

5.4.1 Turning Profile Analysis

An analysis of the swept path movements of B99 passenger vehicles negotiating the High Street and The Parade driveway crossovers has been assessed, together with Service Vehicle swept path turning movements within Bowen Street and the planned access into the site from this location.

Details of these profiles have been included in Appendix A.

5.4.2 Queuing

The required minimum of a 10 m separation (between the rear of a vehicle waiting at the closest parking space or car park ramp entry and the property boundary at the crossover) is available from The Parade approach but not from High Street. This requirement is to ensure the design provides queuing capacity of two (2) vehicles and potential to avoid congestion on the public road (if any).

The queuing capacity from the nearest parking space to The Parade current property boundary is 16.2 m. The proposed road widening recommendation would mean this dimension would reduce to 11.7 m. Thereby still exceeding the required 10 m. The actual separation from the

property boundary to the closest parking space or car park ramp to High Street does not meet this requirement, as it is less than a metre.

As such, the potential exists to impede High Street near the Bowen Street intersection. The use of the first six parking spaces on the ground floor level at the High Street entrance should be dedicated to low turnover long-term parking. This will ensure the full use of approximately 60 m of queuing capacity within High Street before there is impact on Portrush Road.

The proposed development as detailed on MPH Plan 1465 dated 16/01/2017 has been assessed and queuing capacity has been detailed in Appendix A.

Notably the waste collection process will require a Medium Rigid Vehicle (MRV) or Heavy Rigid Vehicle (HRV) truck to make use of the proposed parallel parking space on Bowen Street due to limited headroom clearance (3.5 m) on the ground floor level of the building.

It is also recommended that due to the potential of partially restricting the Bowen Street walkway access for a short period that deliveries be restricted to off peak periods.

6. Pedestrian Facilities

6.1 Major Development Requirement “Guideline 6”

As part of the Development Assessment Commission’s consideration of the preliminary proposal, it required the preparation of a Development Report that included (among other matters) an assessment of the following;

“Guide 6: The proposal includes two new access points, one on The Parade in close proximity to the Portrush Road/the Parade signalised intersection and one on High Street in close proximity to the Portrush Road/High Street junction. In this regard, the proposal should not result in traffic impacts to the adjacent roads, or create road safety issues at or along the roads, particularly Portrush Road. The safe and efficient operation of Portrush Road and The Parade as well as the Portrush Road/The Parade intersection and the Portrush Road/High street junction must be maintained.”

Consequently, GHD has evaluated the adequacy of the existing pedestrian facilities along Portrush Road and The Parade and identified any improvements required to facilitate a safe and pedestrian friendly interface with the development, particularly the interface with the proposed retail component.

6.2 Existing Pedestrian Facilities

The existing development site is presently surrounded by formed paved footpath areas ranging from full footway depth on Portrush Road frontage, approximately 2.0 m to 1.2 m wide on the Bowen Street boundary, approximately 2.8 m to 1.7 m wide on The Parade boundary and approximately 1.6 m wide on High Street. All of these pathways are also supplemented with kerb ramps as required to enable connection across the adjacent intersections and junctions. Although pedestrian facilities to cross Bowen Street are consistent with the minimum standard for a local street, High Street is supported by the provision of a pedestrian refuge.

Crosswalks (2.5 m wide) are available for pedestrian movements at The Parade and Portrush Road traffic signals. Pedestrian actuated traffic signal crossings are in operation on Portrush Road approximately 280 metres south of the development site and The Parade approximately 360 metres east of the site.

6.3 Proposed Improvements

The proposed development includes a main entry foyer with an intentional north-west orientation towards the Portrush Road / The Parade intersection.

This strategy strengthens the link with the “Main Street Shopping/Business Precinct” on the western side of the Portrush Road. The new building design includes an extensive paved / landscaped forecourt of approximately twenty (20) metres in depth from the existing kerbing to the Office building, retail and café entrances and approximately eight (8) metres on the Portrush Road boundary and approximately eleven (11) metres on The Parade boundary.

As a related but separate project, a commitment has been made with the City of Norwood Payneham & St Peters to refurbish Bowen Street into a pedestrian friendly “Shared Space”.

The proposed development also provides a direct, efficient and safe space for both pedestrians and cyclists travelling around the western and northern footpath areas by giving greater clearance from the intersection.

GHD considers the MPH design significantly improves pedestrian safety and amenity.

7. Parking Assessment

In conjunction with a review of the *Norwood Payneham & St. Peters Council (NPSP) (City) Development Plan* requirements for car and bicycle parking provisions, a comparative assessment of demand has also been carried out. The NSW Roads and Traffic Authority (RTA) *“Guide to Traffic Generating Development (2002)”* has been reviewed and due to the extensive multi-storey office development within the Adelaide CBD, (similar to this type of development) the *Adelaide (City) Development Plan* has been included in the following section.

7.1 NPSP Development Plan Requirements

A review of the Norwood Payneham & St Peters (City) Development Plan (consolidated 28 April 2016) Table NPSP/9 indicates the off-street vehicle parking requirements for non-residential land uses namely:

- *“Retail (shop or a group of shops > 250m²) - minimum number of required parking spaces five (5) parking spaces per 100m² of gross leasable floor area, (no maximum number of required vehicle parking spaces)”;*
- *“Office - minimum number of required parking spaces four (4) parking spaces per 100m², (no maximum number of required vehicle parking spaces)”;*
- *“Restaurant (including Cafe) - minimum number of required parking spaces one (1) parking spaces per three (3) seats (no additional requirement for outdoor dining up to 25% of indoor seating) (no maximum number of required vehicle parking spaces)”;*

Based upon the current design (1465 dated 28/11/2016) the proposed car parking requirements would be as detailed in Table 8;

7.2 NSW Roads & Traffic Authority (RTA) Guide

NSW Roads and Traffic Authority (RTA) Guide to Traffic Generating Development (2002) (herein referred to as the RTA Guide) has been examined as a comparative source of parking and traffic generation rates.

This source recommends the following parking generation rates;

- *“Office/ Commercial Premises – Unrestrained situation one (1) parking space per 40 m² of gross leasable floor space”;*
- *Shop with a gross leasable floor space less than 10,000 m² – (6.1) parking spaces per 100 m²;*
- *Restaurant – whichever is greater either fifteen (15) parking spaces per 100 m² or one (1) parking space per three (3) seats.*

This source recommends the following Service Spaces rates;

- *“Shops and Restaurants less than 2000 m² GFA – one (1) space per 400 m² GFA.*

Based upon the current MPH Plan 1465 dated 16/01/2017 the proposed car parking requirements have also been included in Table 8.

The requirement for service vehicle parking spaces is proposed to be met by the dedication of a parallel parking space provided on the western side of Bowen Street for the temporary storage of 12.5 m Heavy Rigid Trucks for waste collection in particular.

Additionally, three (3) indented parallel parking spaces are proposed for the southern kerb line of The Parade for taxis and other short-term use. Supplementary to these spaces are three

short term parking areas planned within the service access to Bowen Street marked as a loading area.

7.3 Comparative Assessment

'Off-street' car parking requirements demanded by other similarly positioned local government authorities and that of Adelaide City have been included within Table 8 as a comparative assessment.

Assumptions and points worth noting about this comparative assessment include the following;

Assumptions

- Restaurant will be formal table service (fine dining) seating arrangements on average four per table (2m² per guest or 9m² for a table of four including some circulation space) indoors. Also assumes that the kitchen, potential bar / waiting area and amenities will account for approximately 40% of the indoor spaces (40% of 500m² say 200m²);
- Based upon a potential floor space of 500m² and an average of 9m² for a table of four guests it is estimated that the seating capacity of the Restaurant will be approximately 150 guests at 1 space per 3 guests say 50 parking spaces;
- The 29 secured car parking spaces within the basement are to be only available to vehicles owned and/or operated by Peregrine Corporation.

Notes

- All of the comparative Council Development Plans and the RTA acknowledge carpark supply can be reduced due to integrated nature of the development;
- RTA is sourced from empirical data obtained through site surveys in NSW and assumes unrestrained policy position on driving to work and that car occupancy of 1.19 people/car and mean employee density is 4.75 employees per 100m² (21m² per employee);
- The integrated nature of the development and the potential for shared use of the parking supply namely Office Staff sharing with Café and restaurant customers and peak trading periods or the restaurant being outside of the general Office hours. Peak parking demands for the integrated development vary from Office/ Commercial prior to 5 pm; Gymnasium between 6 pm and 7 pm weekdays; retail 11 am – 12 noon Saturday; restaurant / café 12 noon – 1 pm and 7 pm – 8 pm Saturday
- The development has been designed to meet community expectation for parking supply while supporting a shift toward active and sustainable transport modes accounting for both the existing and proposed bus and future tram services;
- The discounted parking rate factors a degree of shared use for all users.

7.4 Discount Factors

Consistent with other Development Plans the NPSP (City) Development Plan also acknowledges that in particular designated areas capable of making use of significant public transit services that the demand for car parking would vary, namely in Table NPSP9A “Off-street Vehicle Parking Requirements for Designated Areas”.

This Table NPSP/9A relates to a specific list of designated areas based upon existing public transport infrastructure, which does not presently include the potential of Tram Services along The Parade.

However, the South Australian Government’s draft “*Integrated Transport and Land Use Plan*” (ITLUP) does include a proposal for a tram to the eastern suburbs (as part of a new tram network across Adelaide called AdeLINK). Within AdeLINK the tram to the east is known as EastLINK and its route is planned to be along The Parade (to Magill) including the section adjacent to the site of the Peregrine Head Office redevelopment.

As this project is scheduled for the medium term (5 to 15 years), it is considered that the implications for the subject site are relevant and accordingly, should be considered in the determination of the parking supply for the Peregrine Head Office.

As a potential NPSP (City) “*designated area*” with the consideration of this site being within 200 metres of a proposed high frequency public transit service and potentially within 400 metres of a passenger tram station the parking provisions is considered to be appropriate to be reduced.

The off-street vehicular parking requirement is also impacted by the development having a mixed use with integrated (shared) parking potential where respective peak period parking demands across a range of uses occurs at different times.

Subject to acceptance of these circumstances the NPSP (City) Development Plan provides that within a non-residential development (excluding tourist accommodation), the desired minimum number of vehicle parking spaces is three (3) per 100m² of gross leasable floor area. The maximum number of vehicle parking spaces is capped at six (6) per 100m² of gross leasable floor area.

Based upon these parameters the minimum parking supply would be 283 spaces as indicated in Table 8 accepting training, meeting rooms and the leisure centre activities would be ancillary to the primary use of the site and subject to ride multipurpose trips.

Table 8 Comparative Assessment

Land Use Activity	NPSP Council	RTA NSW	Burnside Council	TTG Council	Adelaide Council	Demand Range	MPH Design Supply 16/01/2017	NPSP Discount Factor 3/100m ²
Office / Commercial (7620m²)	4 spaces /100m ² GFA	1 space / 40m ² GFA	4 spaces /100m ² GFA	4 spaces /100m ² GFA	3 spaces / 100m ² building floor area	(305 spaces) NPSP/ TTG/Burn (191 spaces) RTA (229 spaces) ACC	Basement 107 plus 10 M/C; G/ Floor 60 spaces; Level 1 55 spaces	229 Spaces
Retail (Est 70% of 1060m² = 742m²)	5 spaces /100m ² GFA	Ranging from 6.1 to 5 spaces GFA	7 spaces / 100m ² building floor area	3 spaces / 100m ² building floor area	3 spaces / 100m ² building floor area	(37 spaces) NPSP (37 spaces) RTA (22 spaces) AC/TTG (52 spaces) Burn	Shared use of 20 spaces in Bowen Street (Nett 3 extra over existing)	22 Spaces
Café (Est 30% of 1060m² = 318m²)	1 space / 3 seats	1 space / 3 seats	1 space / 3 seats	1/15m ² building floor area	1 space / 3 Seats	Based upon 60% of area for seating = 191m ² . Equates to 32 spaces	Shared use of 3 spaces on The Parade	9 spaces
Restaurant/deck (515m² plus 235m²)	1 space / 3 seats	1 space / 3 seats	1 space / 3 seats	1/15m ² building floor area	1 space / 3 Seats	(Based upon 155 seats + average 26 patrons on decking provide 59 spaces)	Shared use of above	23 spaces
Training Rooms (520m²) Theatrette (225m²)	4 spaces /100m ² GFA	1 space / 40m ² GFA	4 spaces /100m ² GFA	4 spaces /100m ² GFA	3 spaces / 100m ² BFA	(30 spaces) NPSP/TTG/Burn (22 spaces) ACC (19 spaces) RTA	Shared use of above	Shared use of above
Meeting Rooms (1905m²)	4 spaces /100m ² GFA	1 space / 40m ² GFA	4 spaces /100m ² GFA	4 spaces /100m ² GFA	3 spaces / 100m ² building floor area	(76 spaces) NPSP/TTG/Burn (57 spaces) ACC (48 spaces) RTA	Shared use of above	Shared use of above
Gym/Pool/Spa (910m²)	Needs Basis	3 spaces /100m ² BFA	10 spaces /100m ² GFA	No specific requirement	No specific requirement	Nil (27 spaces) RTA (91 spaces) Burn	Shared use of above	Shared use of above
Total	688	469	836	668	447	398 spaces	225 plus 10 M/C	283 Spaces

Notes;

- Accommodation of 815m² not included within these calculations as it is only proposed to be used for a month per year;
- The 315m² decking surrounding the pool is considered as ancillary walkway space;
- Level 3 Atrium and perimeter decking are also considered ancillary walkway and respite space.

7.5 Parking for People with Disabilities

The site design also includes seven (7) parking spaces for people with disabilities.

A review of the AS 2890.6 indicates the provision of accessible car parking spaces requires two (2) disabled parking spaces for every 50 parking spaces and for every additional 50 car parking spaces or part thereof not less than one (1) extra space. This equates to a requirement of six (6) to satisfy an overall car parking provision of 225 spaces.

7.6 Off street Bicycle Parking Requirements

A review of the Norwood Payneham & St Peters (City) Development Plan (consolidated 28 April 2016) Table NPSP/10 indicates the off-street bicycle parking requirements for non-residential land uses are as follows;

- Office Development – Employee / resident bicycle parking space rate is one (1) for every 100m² of gross leasable floor area;
- Office Development – Visitor / shopper bicycle parking space rate is two (2) plus one (1) per 500m² of gross leasable floor area;
- Shop Development – Employee / resident bicycle parking space rate is one (1) for every 150m² of gross leasable floor area;
- Shop Development – Visitor / Shopper bicycle parking space rate is one (1) per 300m² of gross leasable floor area;

Based upon the current design (MPH Plan 1465 dated 16/01/2017) and the proposed gross leasable Office floor space areas, the NPSP (City) Development Plan requires an employee bicycle parking provision of seventy-six (76) spaces and visitor provision of fifteen (15) spaces.

Based upon the current design (MPH Plan 1465 dated 16/01/2017) and the proposed gross leasable Shop floor space areas, the NPSP (City) Development Plan requires an employee bicycle parking provision of seven (7) spaces and shopper/visitor provision of eleven (11) spaces. Thereby a total bicycle parking provision of (76+7) 83 employee and (15+11) 26 visitor spaces are sought.

The current design indicates secured bicycle parking in excess of 180 spaces, located at the northern end of Level One labelled EOT “End of Trip” facilities. Visitor and /or shopper bicycle parking provisions for greater than (20) spaces could also be included at the ground floor level as part of the streetscape planned for the area adjacent to the Café / Retail and primary office entrance.

On this basis, the proposed bicycle parking provisions can exceed the requirement of the NPSP (City) Development Plan.

7.7 Off Street Bicycle Parking Supply Assessment

An area of approximately 395m² has been included for “end of trip” (EOT) bicycle parking provisions on Level One (1).

GHD can confirm the geometric design (refer GHD 33 – 18174 SK321) requirements for access aisles; storage space; ramps and doorways have been assessed and satisfy the design specifications of AS 2890.

7.8 Motor Cycle Parking

The design notably includes the provision of ten (10) motor cycle parking spaces within the basement floor level. These spaces have been checked and comply with the requirements of AS 2890.

7.9 Bowen Street 'Shared Street' Road Design

As a related but separate project, Peregrine Corporation has consulted with the NPSP Council about the potential of redeveloping Bowen Street to achieve a "Shared Street" road design. Peregrine Corporation has also indicated it is prepared to fund the necessary work and has received an "in principle" agreement from Council that the idea could be progressed.

The attributes of the 'Shared Street' will include significant paving, landscaping and an angle-parking format that can accommodate some twenty (20) parking spaces in lieu of the existing seventeen (17).

It is recommended that the parking spaces in Bowen Street should be signed as short term (e.g. two hour) parking to ensure visitor access for residential and the adjacent properties during business hours and be unrestricted after hours.

7.10 Conclusion

It is acknowledged that the proposed supply of 225 car parking spaces does not meet the Council's Development Plan requirements however the emphasis in this proposal is about the nexus with the Central Business District of Norwood and the community expectation for parking supply while supporting a shift toward active and sustainable transport modes.

In keeping with the projected shift to the future use of the proposed Tram and supporting the potential use of bicycles parking spaces the design creates stronger pedestrian and cycling facilities and improved amenity. The inclusion of 10 motor cycle parking spaces also provides greater employee transport choice.

It is also noted that a number of other established Office/Commercial developments within the Norwood CBD similarly under subscribe in car parking provisions with an emphasis on the use of public transport and the potential of kerbside parking within a reasonable walking distance of 400m. In this particular case it has been estimated that there is a potential capacity of 300 parking spaces within close proximity to the site.

8. Response to DPTI referral comments

Summary of Traffic, Access and Parking comments received from DPTI (Planning) 11 November 2016 related to proposed “Mixed Use” Development at 270 The Parade, Kensington.

8.1 DPTI (Transport) Comments

Item	Issue	Implications / Response
1.	<p>Guideline 4</p> <p><i>“DPTI (P&TP) has identified that an additional 1.6 metres of road widening is required over and above the 4.5 metres identified by GHD” to allow for the future increases in the footpath widths.</i></p>	<p>The implication of this demand to increase the road widening from 4.5m to 6.1m (4.5+1.6) means;</p> <ol style="list-style-type: none"> 1. The north western edge of the building would need to be redesigned to provide a clear 6.1m setback. 2. The façade feature would also be impacted by the increased setback, changing the way its form and way it articulates around the building. <p>Response</p> <p>In accordance with recent discussions with DPTI, Peregrine Corporation has confirmed is prepared to accept a boundary realignment of 4.5m.</p>
2.	<p>Guideline 6</p> <p><i>“Vehicle queuing needs to be catered for on-site should boom gates or similar traffic control device in envisaged at The Parade access point”</i></p>	<p>Response</p> <p>The MPH design plans do not include Boom Gates at The Parade access point.</p>
3.	<p><i>“The Parade access is identified as being limited to left turn in and left turn out movement only. However, there is no method identified for limiting access”</i></p>	<p>Response</p> <p>This outcome could be achieved via a pavement bar layout. Acceptable for pavement bars on Kensington Road to Bowen street junction becoming a potential condition of approval.</p>
4.	<p><i>“Traffic generation must be calculated for all uses...</i></p> <ul style="list-style-type: none"> • <i>DPTI considers that five of the seven proposed uses that are currently excluded should be included;</i> • <i>The 665m2 accommodation should be included in the traffic generation calculation unless Very rare international business partners short term (one month per year)</i> • <i>Discounts to traffic generation should be applied for shared or common trips.”</i> 	<p>Response – Refer to section 3.1</p> <p>Response – Refer to section 3.1</p> <p>Response – Refer to section 3.1</p>

Item	Issue	Implications / Response
5.	<i>“Traffic distribution should be split into entering and exiting directions”</i>	It is considered that the GHD Report provides appropriate information within Section 2.7 and 2.8 (measured existing traffic distribution) and Sections 3.3 to 3.6 about the projected traffic distributions.
6.	<i>“The models of the existing situation should be prepared and calibrated to the satisfaction of DPTI”</i>	Response - Noted.
7.	<i>The Portrush Road / High Street junction should include development traffic and consider the operation of the nearby Portrush Road/The Parade intersection.</i>	Response - Noted – To be provided within an Updated “Traffic Impact Assessment.” Acceptable for this request to become a potential condition of approval to DPTI’s satisfaction.
8.	<i>“The Sidra Modelling must ensure that the:</i> <ul style="list-style-type: none"> <i>• Geometry is updated to be consistent with lane lengths and operation of the sites;</i> <i>• Phasing is updated to be consistent with the operation of the Portrush Road/The Parade site (right turn filters / F1 & F2 phases not modelled)”</i> 	Response - Noted Response - Acceptable for this request to become a potential condition of approval (part of an Updated “Traffic Impact Assessment”) to DPTI expectations.”

8.2 DPTI Reserved matters detailed in DPTI (Planning) Feedback

Peregrine Corporation do not anticipate any reserved matters as part of the approval process.

Conditions of Approval	Implications / Response
1. <i>No direct Access to Portrush Road;</i>	Response: Acceptable
2. <i>Extension of the solid median on The Parade from the Portrush Road/ The Parade intersection to Bowen Street;</i>	Response: Acceptable for pavement bars to be installed at the applicant’s expense.
3. <i>All road works costs being borne by the applicant;</i>	Response: Acceptable
4. <i>Provide a traffic management plan for the construction period;</i>	Response: Acceptable subject to clause defining only road work that is directly associated with the management of turning controls into the Peregrine Site.
5. <i>Stormwater management at the expense of the applicant;</i>	Response: Acceptable
6. <i>All materials and finishes shall not be permitted to result in glare or other effects;</i>	Response: Acceptable subject to only the works directly associated with the Peregrine site.
7. <i>Signage to be in accordance with “Advertising Signs Assessment Guidelines for Road Safety”;</i>	Noted.
8. <i>Service vehicle movements shall be undertaken outside of peak traffic hours.</i>	Noted.

Conditions of Approval	Implications / Response
<p>Note</p> <ol style="list-style-type: none"> 1. The consent of the Commissioner of Highways under the MARWP Act is required; 2. Should Boom Gates or similar traffic control device be envisaged, vehicle queuing must be catered for onsite. 	<p>Noted</p> <p>Noted</p>

8.3 Other Agency Comments

The following specific matters have been raised during consultation with other Agencies and the public and relayed to the applicant by the DPTI (Planning) Case Manager. The recommended responses have been added to the following table.

Item	Issue	Resolution
9.	<p><i>“Further explanation, analysis and justification is required regarding the proposed car parking arrangements”</i></p> <ul style="list-style-type: none"> • <i>“For each land use (Office, restaurant, training rooms etc) when is the peak parking period, and what overflow is expected beyond the car parking spaces provided in the building”</i> 	<p>Land use peak parking period and overflow expectations as follows;</p> <p>Office - 8-5pm (Mon-Fri)- Considerable surveys were undertaken of the current staff profile (including mode share and parking requirements). The revised design now provides 225 car parking spaces and 10 motor cycle parking spaces.</p> <p>Research has shown that the anticipated demand range varies significantly based on the referenced parking standard documents. It is typical of any development within a CBD environment that employees travel and park using the facilities available with no expectation of site parking.</p> <p>In view of the current mode choices made by staff, the available public transport opportunities and longer term potential tram services along The Parade, overflow parking patterns are expected to reflect the existing use preference for local streets which has a conservative capacity of more than 300 spaces within 400m of the site.</p> <p>Restaurant - 12-1pm (Mon-Fri), 7-8pm Sat The peak restaurant demand is expected to be Friday and Saturday evenings after completion of the business hours.</p> <p>Training Rooms - 10-2pm (Mon-Fri)- The Training rooms and theatre will typically cater for OTR staff on an infrequent basis. Experience shows that staff visit the site utilising public transport, are already on site or will make use of available car parking spaces within the planned building and nearby area.</p>

Item	Issue	Resolution
		<p>Café/Retail- 12-1pm (Mon-Fri) 7-8pm Sat - The café/retail will serve staff already on site during the week or passing pedestrian trade and is not planned as a weekday destination facility. The peak demand for the café will be on a Saturday when the majority of car parking spaces will be available.</p> <p>Gymnasium / Pool /Spa- 6-7pm (Mon-Fri)- The peak usage of these land uses will be after normal business hours and will include employees already on site. Shared use of the onsite supply of 222 spaces will be supported by > 300 available spaces within the local street system.</p> <p>Accommodation</p> <p>The accommodation will be split into fifteen units, proposed use is for the applicant's family and rare overnight business guest use. It is anticipated that the guests using these facilities will arrive and depart using taxis and other forms of public transport.</p> <p>Frequency of use is expected to be less than a month per year and in off peak demand timeframes.</p>
10.	<i>"How will increase in staff numbers up to 400 in 3 years be accommodated?"</i>	Advocate staff car-pooling and mode share by the provision of 'end of trip facilities' and use of public transport, this will be further enhanced should the planned tram services along The Parade eventuate. As indicated earlier in a CBD situation staff will have no expectation of site parking.
11.	<i>"Capacity of On Street Parking in the surrounding residential streets"</i>	On street parking surveys have not been undertaken however as a conservative estimate more than 600 parking spaces would be available within a 400m catchment of the site. Assuming resident parking and other parking occurs then a 50% availability (>300 spaces) may be a reasonable estimation.
12.	<i>"Consideration of using other car parking facilities in this locality?"</i>	There are no public car parks within close proximity to the site. The Applicant does not have any plans to make formal use of another off road parking facility.
13.	<i>"Car parking arrangements during construction to minimise impacts to traffic flow and amenity?"</i>	A "Construction Traffic Management Plan" will be prepared in consultation with the Council and DPTI that will account for contractor parking and delivery vehicles. Acceptable for this request to become a potential condition of approval.

Item	Issue	Resolution
14.	<i>"Is there capacity for additional basement parking?"</i>	The proposal includes one basement level allocated for car parking. There are no plans to build additional basement car parking on top of what has been proposed.

9. Recommendations

9.1 Introduction

This section details 'recommendations' aimed at the management of traffic, parking control, pedestrian and cyclist safety that should be implemented.

9.2 Overview

As detailed in this report the key findings from a traffic and road safety perspective are:

- Pedestrian and cyclist access, egress and 'end of trip' facilities can be significantly improved with the planned redevelopment with the wider footpaths and "end of trip" facilities including secured under cover bicycle parking;
- Property access crossovers to The Parade, Bowen Street and High Street have been positioned in optimum locations to both service the site and minimise any disruptions to the adjacent road network. It is also proposed to prevent right turns at The Parade entrance with the use of a pavement bar scheme;
- The future development of "shared-lane running" tram service along The Parade can be accommodated within the streetscape, subject to 4.5m road widening which would nominally impact the north western top edge of the building at a height over 10m;
- No significant "level of service" improvements will be achieved at The Parade / Portrush Road intersection without the elimination of existing turning movements;
- Redevelopment of Bowen Street as a "Shared Street" road design will improve pedestrian safety, control of access and parking management subject to introduction of short term parking restrictions.

10. Conclusions

The development proposes substantial new building works on a site affected by the Metropolitan Adelaide Road Widening Plan and is adjacent to a corridor identified as potentially becoming part of a new tram system.

GHD has considered the implications of providing the proposed tram service and considers the development proposal enables a satisfactory potential for this planned public transport project.

Modelling projections of the future implications on the Portrush Road/The Parade signalised intersection and the Portrush Road/High Street junction have concluded that the additional peak hour traffic generated by the planned development is sustainable. However, any significant 'level of service' improvements at the traffic signals will require elimination of turning movements.

Evaluation of the proposed design has concluded that the planned changes will improve pedestrian safety and amenity within this area, enhance cycling potential and parking provisions.

Future plans for the potential redevelopment of Bowen Street can also improve its amenity and functionality as a low speed pedestrian friendly environment and improve the potential for short term parking opportunities.

Appendices

Appendix A Sketch Plans & Turning Profiles

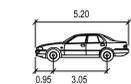
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-  PROPERTY BOUNDARY
-  VEHICLE BODY
-  RAMP

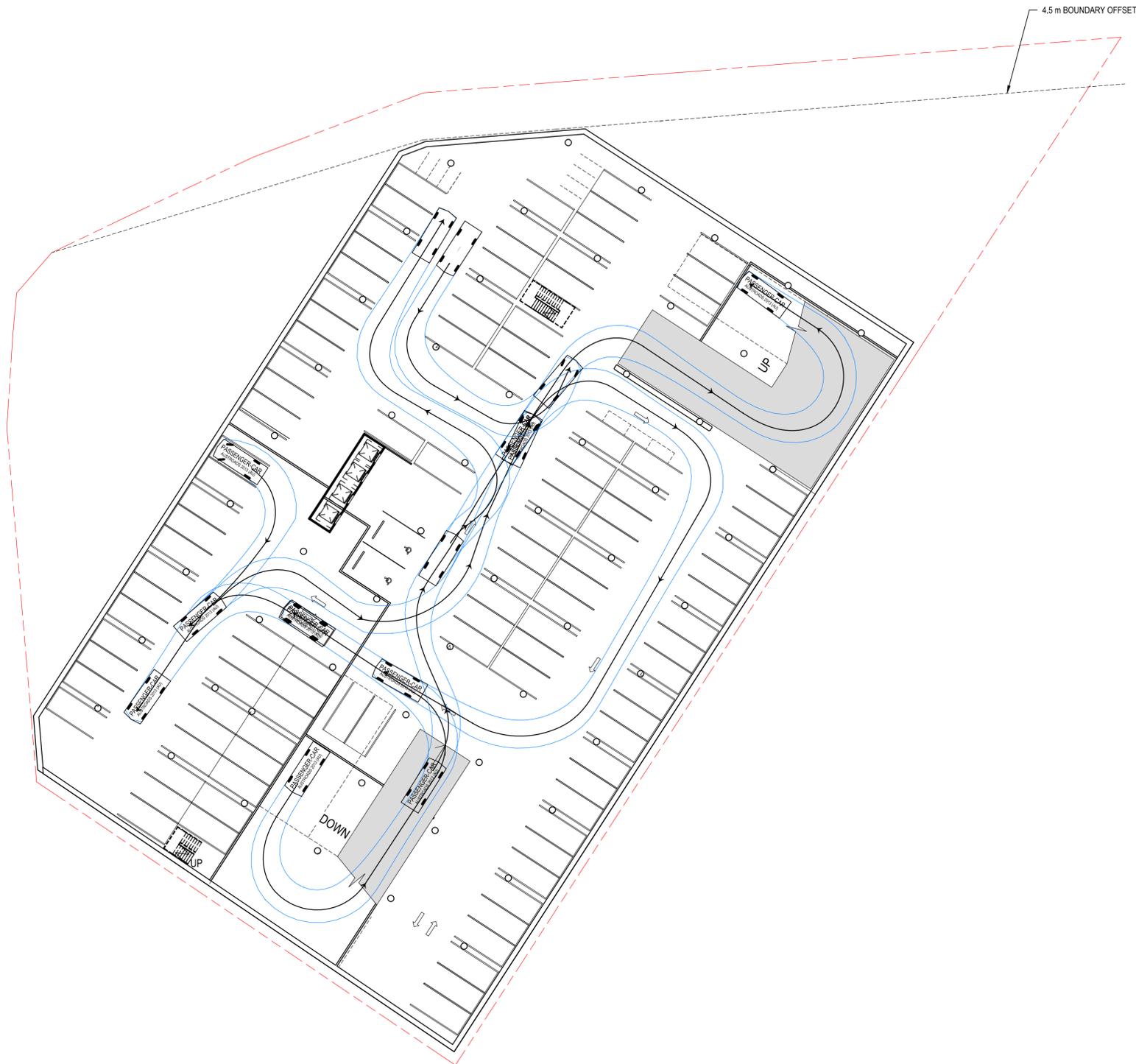
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3. DESIGN VEHICLE: PASSENGER CAR/ B99 VEHICLE
DESIGN SPEED: 10 km/h

VEHICLE TYPE:



PASSENGER-CAR		units
Width	1.94	meters
Track	1.84	
Lock to Lock Time	6.0	
Steering Angle	33.6	



PRELIMINARY

rev	description	app'd	date
D	ISSUED FOR INFORMATION	GB*	06.02.17
C	ISSUED FOR INFORMATION	DM*	16.08.16

PEREGRINE CORPORATION PTY LTD
PEREGRINE HEAD OFFICE
TURN PATH ANALYSIS - BASEMENT
CAR PARK CIRCULATION

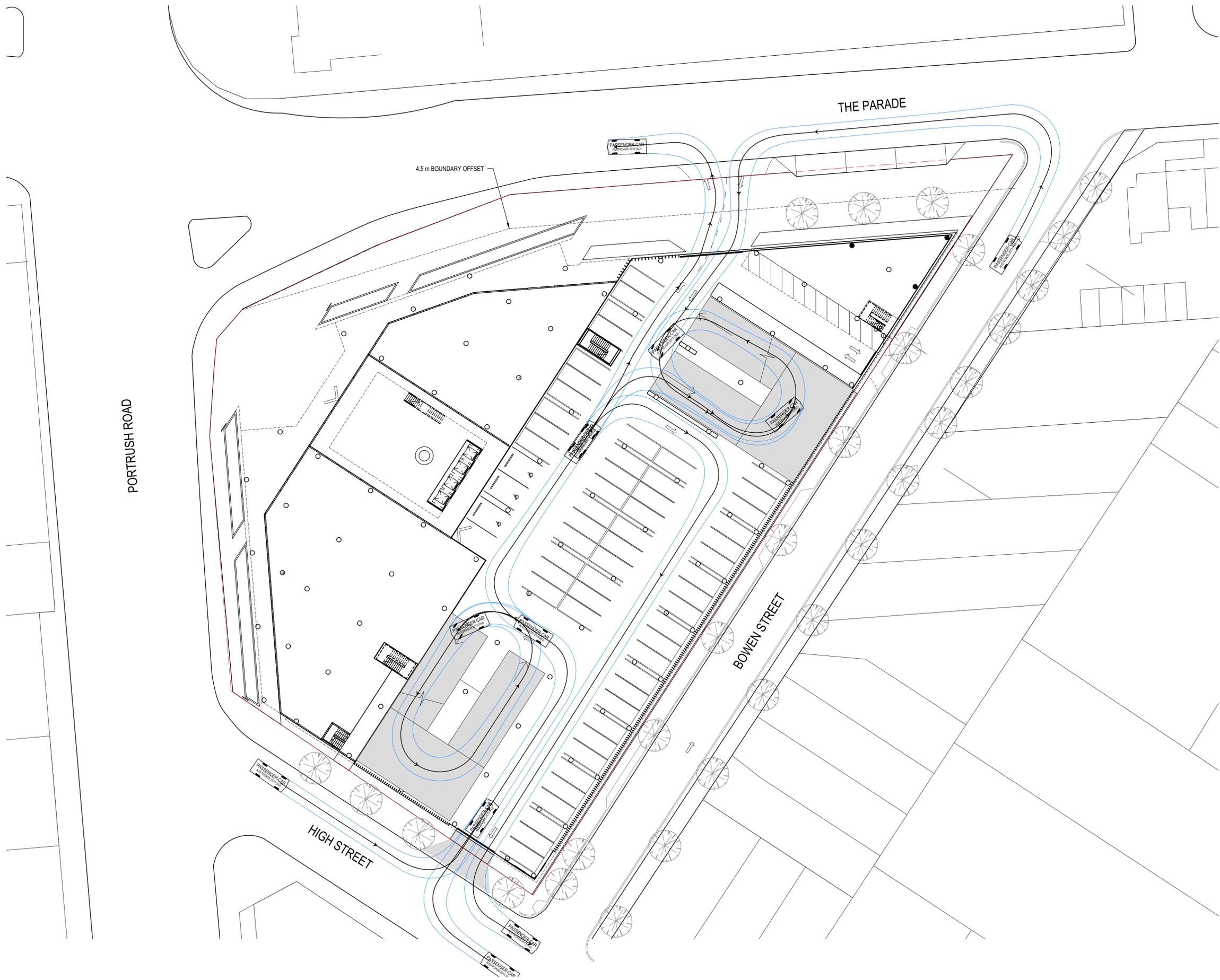


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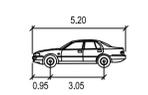
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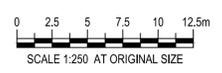
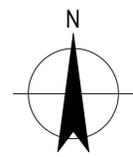
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Track	1.84	meters
Lock to Lock Time	6.0	meters
Steering Angle	33.6	degrees



PRELIMINARY

rev	description	app'd	date
D	ISSUED FOR INFORMATION	GB*	06.02.17
C	ISSUED FOR INFORMATION	DM*	16.08.16

PEREGRINE CORPORATION PTY LTD
 PEREGRINE HEAD OFFICE
 TURN PATH ANALYSIS - GROUND LEVEL
 CAR PARK CIRCULATION

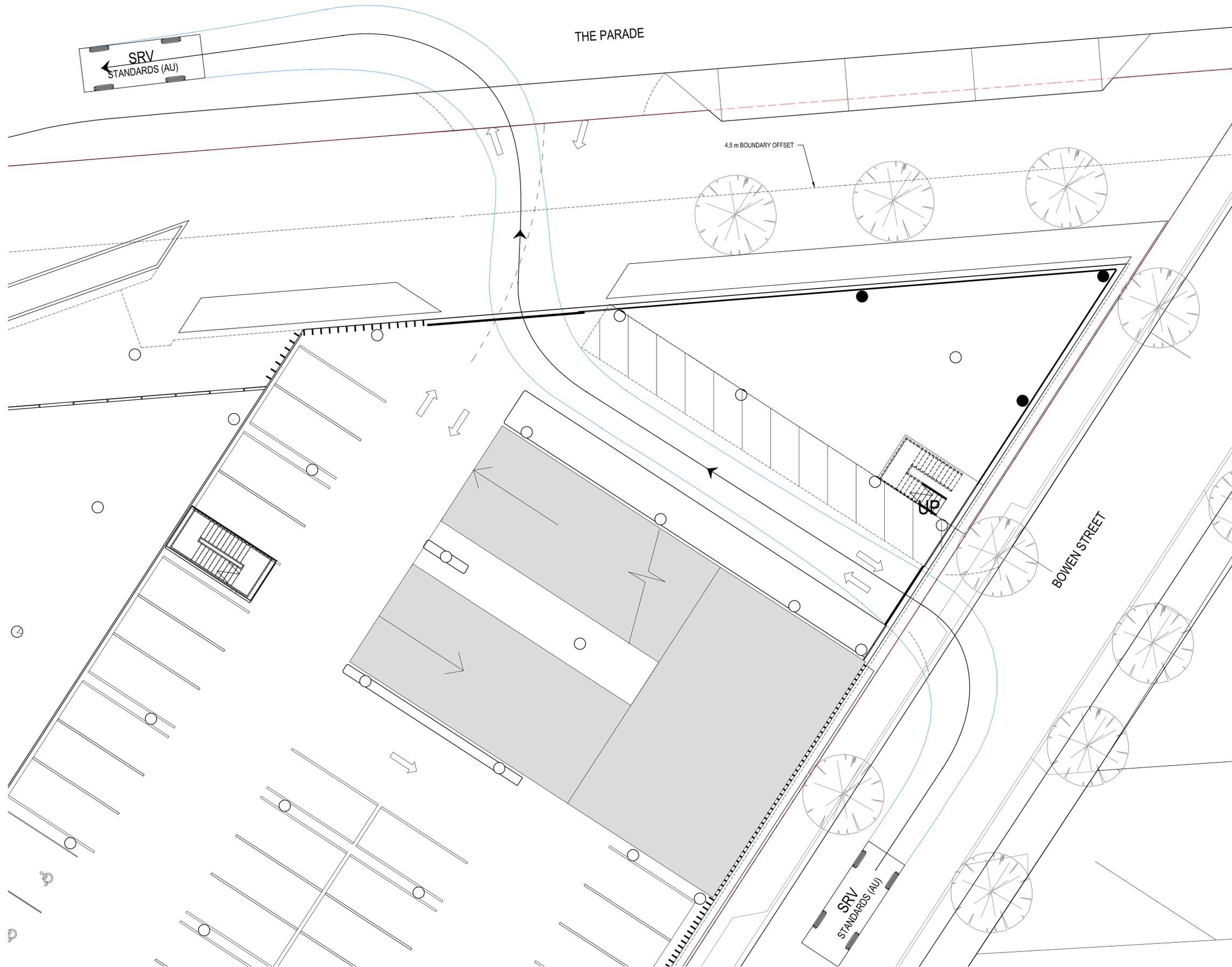


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 date | FEB 2017 | rev no. | D

approved (PD) **SK310**



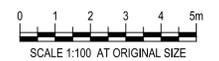
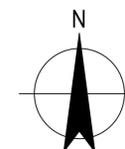
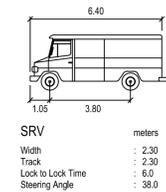
LEGEND:

- PROPERTY BOUNDARY
- VEHICLE BODY
- RAMP

NOTES:

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3. DESIGN VEHICLE: 6.4 m SRV
DESIGN SPEED: 10 km/h

VEHICLE TYPE:



PRELIMINARY

rev	description	app'd	date
D	ISSUED FOR INFORMATION	GB*	06.02.17
C	ISSUED FOR INFORMATION	DM*	16.08.16

PEREGRINE CORPORATION PTY LTD
 PEREGRINE HEAD OFFICE
 TURN PATH ANALYSIS - GROUND LEVEL
 SRV LOADING AREA VIA BOWEN ST

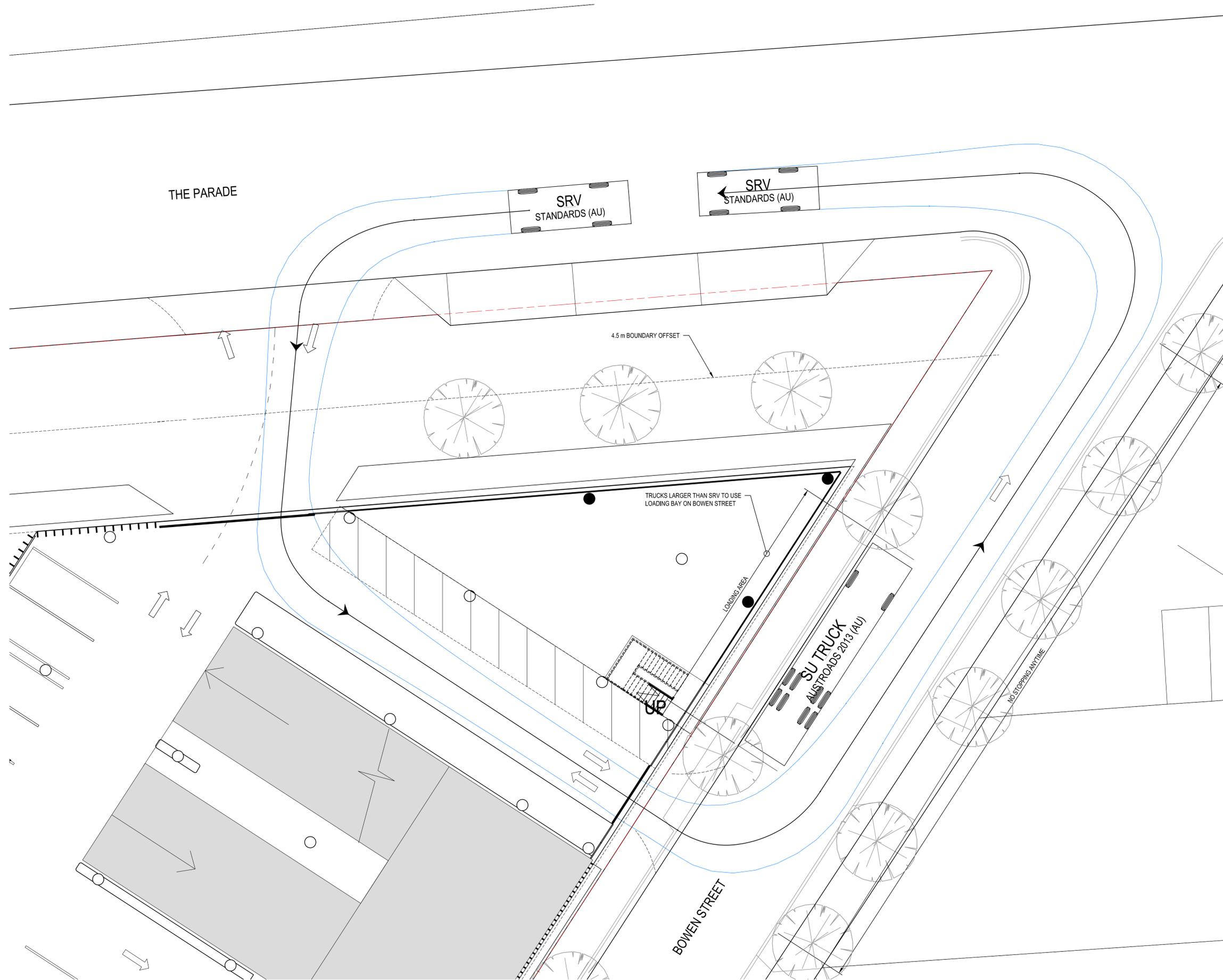


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scale | 1:100 for A1 job no. | 33-18174
 date | FEB 2017 rev no. | D

approved (PD) SK311



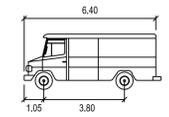
LEGEND:

- PROPERTY BOUNDARY
- VEHICLE BODY
- RAMP

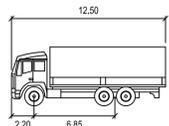
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3. DESIGN VEHICLE: 6.4 m SRV
DESIGN SPEED: 10 km/h

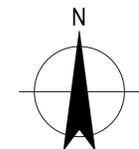
VEHICLE TYPE:



SRV meters
Width : 2.30
Track : 2.30
Lock to Lock Time : 6.0
Steering Angle : 38.0



SU TRUCK meters
Width : 2.50
Track : 2.50
Lock to Lock Time : 6.0
Steering Angle : 38.6



PRELIMINARY

D	ISSUED FOR INFORMATION	GB*	06.02.17
C	ISSUED FOR INFORMATION	DM*	16.08.16
rev	description	app'd	date

PEREGRINE CORPORATION PTY LTD
PEREGRINE HEAD OFFICE
TURN PATH ANALYSIS - GROUND LEVEL
SRV LOADING AREA VIA THE PARADE



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scale | 1:100 for A1 job no. | 33-18174
date | FEB 2017 rev no. | D

approved (PD) SK312

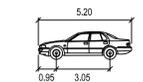
LEGEND:

-  PROPERTY BOUNDARY
-  VEHICLE BODY
-  RAMP

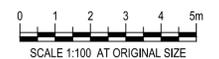
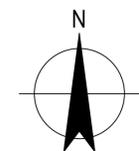
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3. DESIGN VEHICLE: PASSENGER CAR/ B99 VEHICLE
DESIGN SPEED: 10 km/h

VEHICLE TYPE:



PASSENGER-CAR		metres
Width	: 1.94	
Track	: 1.84	
Lock to Lock Time	: 6.0	
Steering Angle	: 33.6	



PRELIMINARY

rev	description	app'd	date
D	ISSUED FOR INFORMATION	GB*	06.02.17
C	ISSUED FOR INFORMATION	DM*	16.08.16

PEREGRINE CORPORATION PTY LTD
PEREGRINE HEAD OFFICE
TURN PATH ANALYSIS - GROUND LEVEL
QUEUING CAPACITY VIA THE PARADE

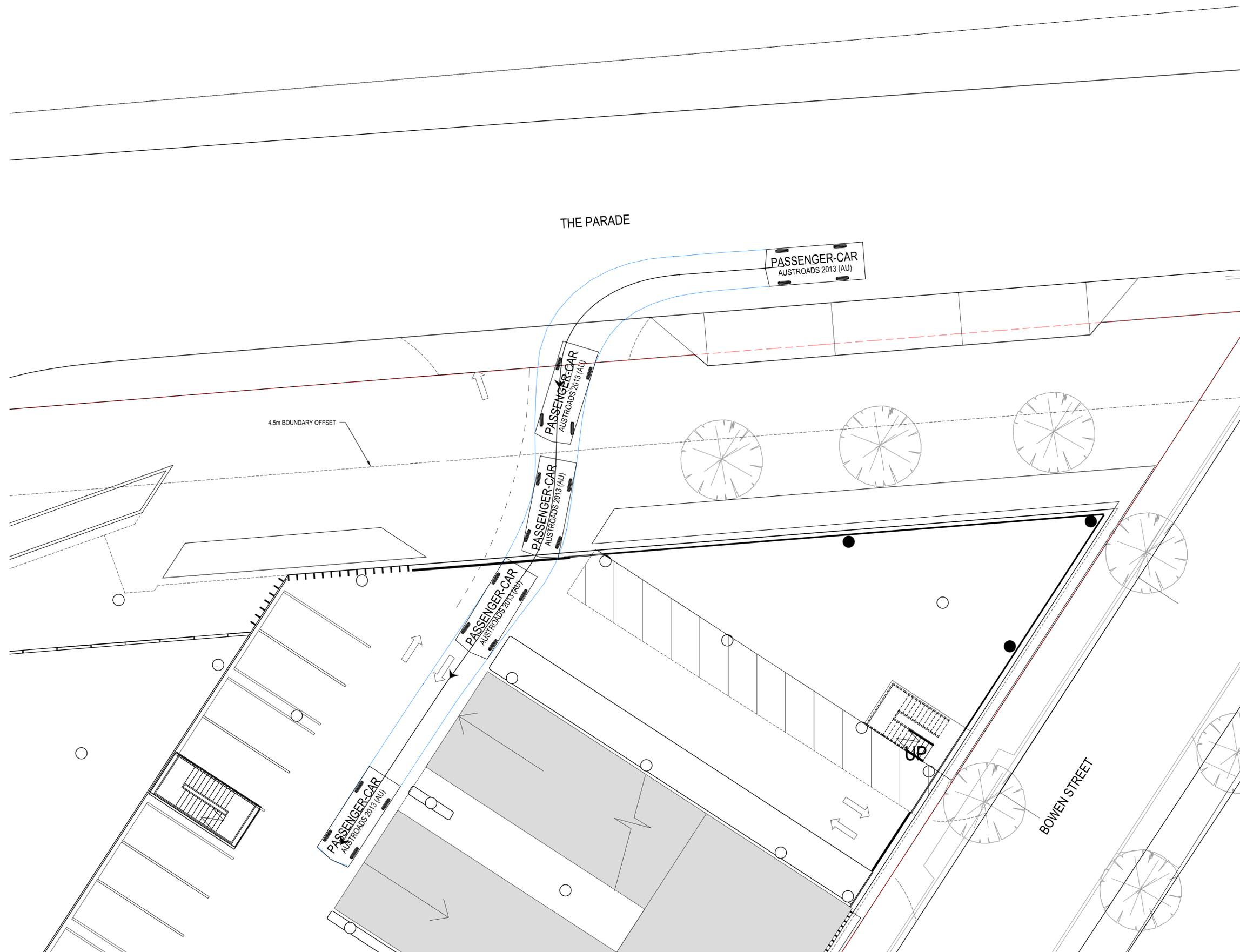


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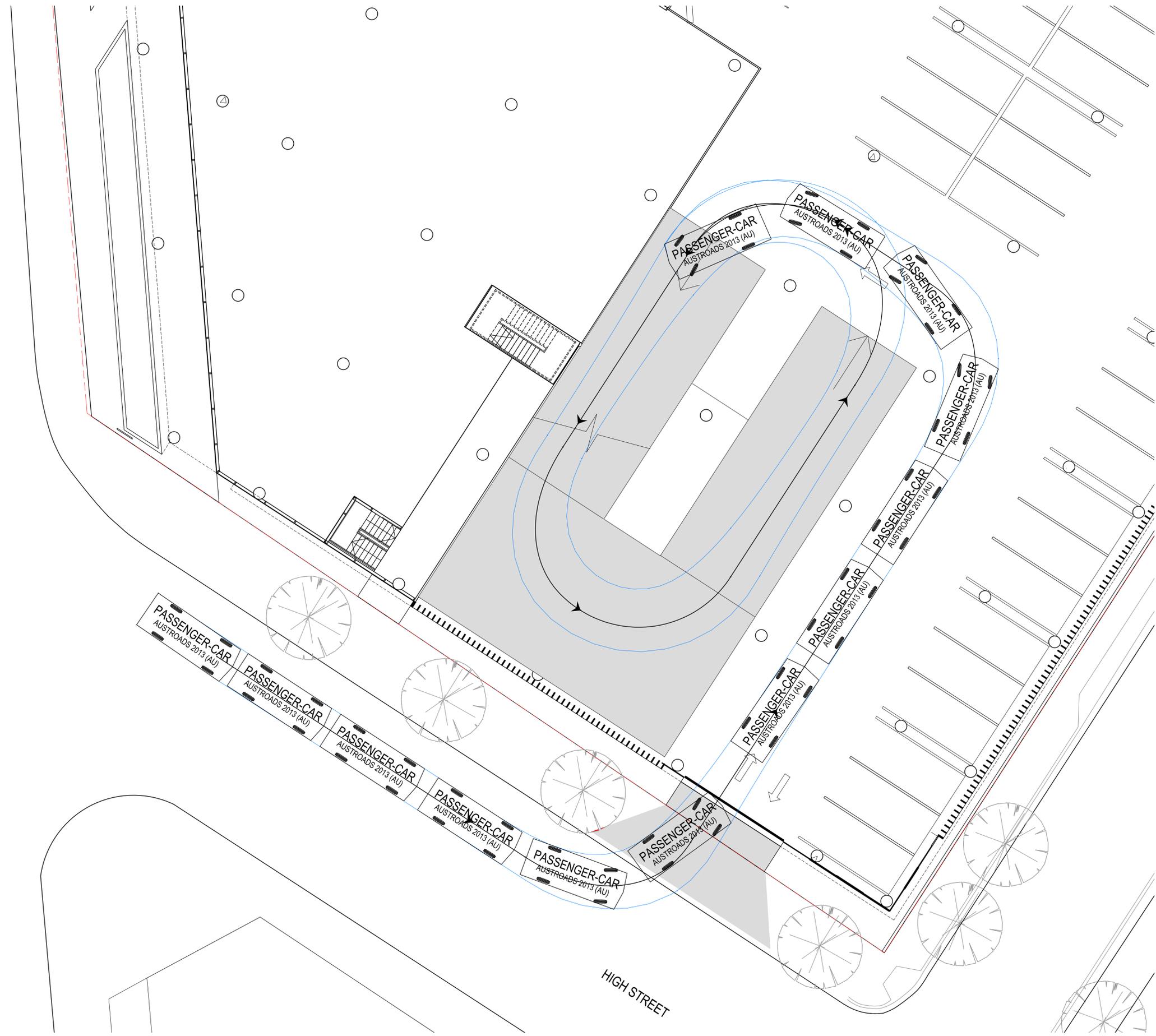
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scale | 1:100 for A1 job no. | 33-18174
date | FEB 2017 rev no. | D

approved (PD) SK313



PORTRUSH ROAD



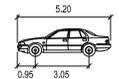
LEGEND:

- PROPERTY BOUNDARY
- VEHICLE BODY
- RAMP

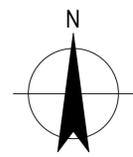
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3. DESIGN VEHICLE: PASSENGER CAR/ B99 VEHICLE
DESIGN SPEED: 10 km/h

VEHICLE TYPE:



PASSENGER-CAR meters	
Width	: 1.94
Track	: 1.84
Lock to Lock Time	: 6.0
Steering Angle	: 33.6



PRELIMINARY

rev	description	app'd	date
D	ISSUED FOR INFORMATION	GB*	06.02.17
C	ISSUED FOR INFORMATION	DM*	16.08.16

PEREGRINE CORPORATION PTY LTD
 PEREGRINE HEAD OFFICE
 TURN PATH ANALYSIS - GROUND LEVEL
 QUEUING CAPACITY VIA HIGH STREET

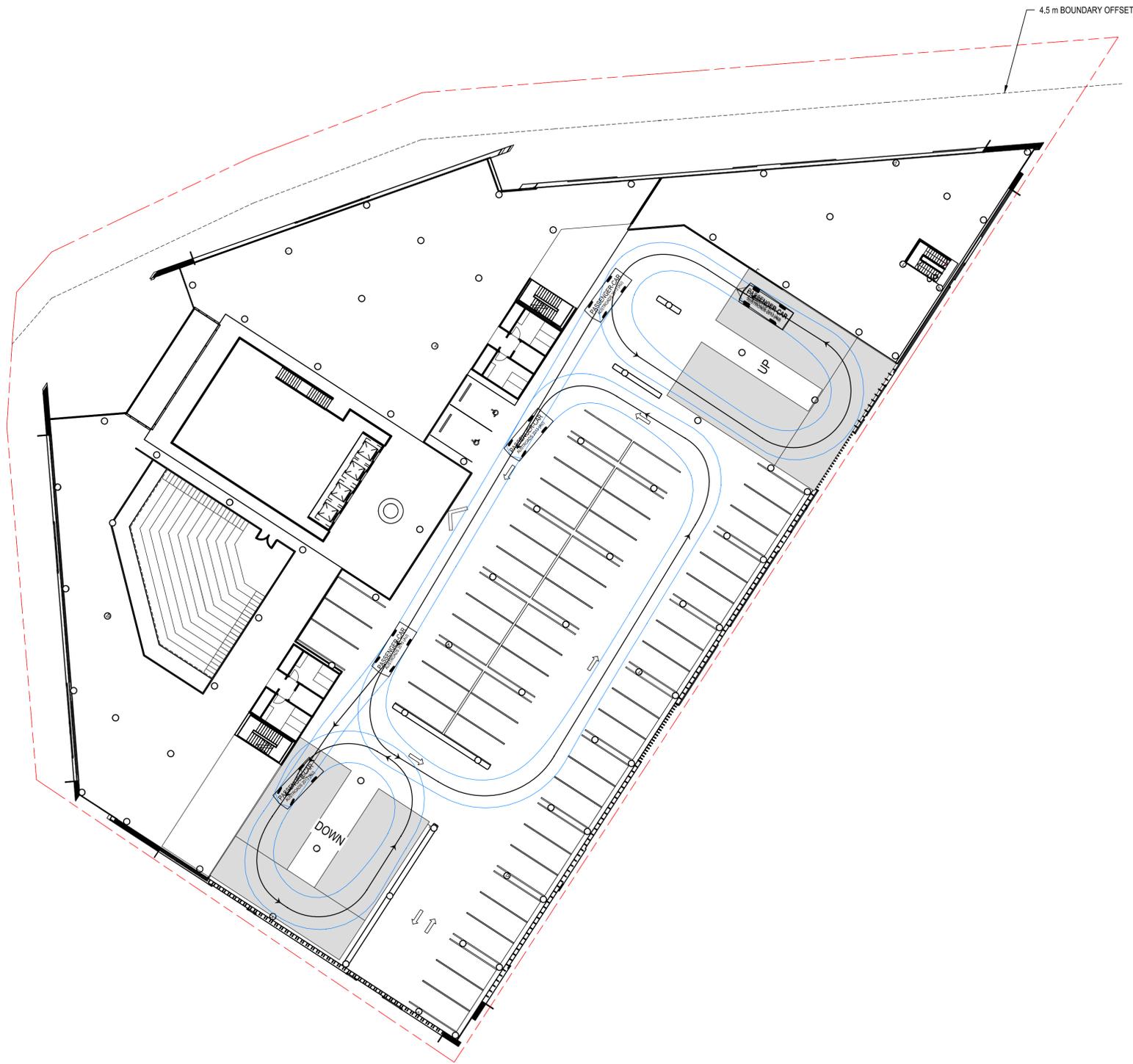


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scale 1:100 for A1 job no. 33-18174
 date FEB 2017 rev no. D

approved (PD) **SK314**



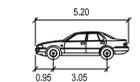
LEGEND:

- - - - PROPERTY BOUNDARY
- — — — VEHICLE BODY
- RAMP

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3. DESIGN VEHICLE: PASSENGER CAR/ B99 VEHICLE
DESIGN SPEED: 10 km/h

VEHICLE TYPE:



PASSENGER-CAR		units
Width	: 1.94	meters
Track	: 1.84	
Lock to Lock Time	: 6.0	
Steering Angle	: 33.6	



PRELIMINARY

rev	description	app'd	date
D	ISSUED FOR INFORMATION	GB*	06.02.17
C	ISSUED FOR INFORMATION	DM*	16.08.16

PEREGRINE CORPORATION PTY LTD
PEREGRINE HEAD OFFICE
TURN PATH ANALYSIS - LEVEL ONE
CAR PARK CIRCULATION



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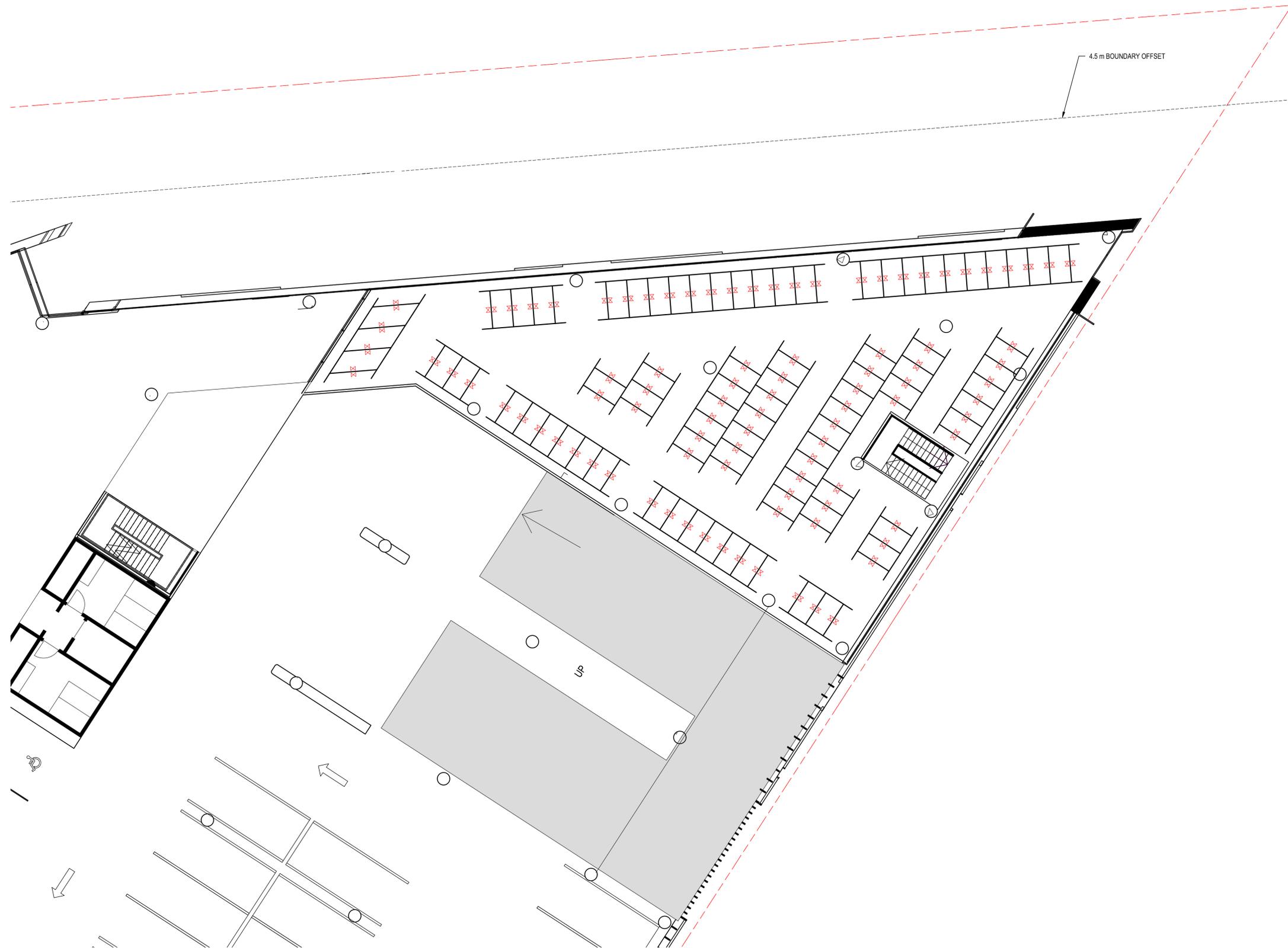
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scale | 1:250 for A1 job no. | 33-18174
 date | FEB 2017 rev no. | D

approved (PD) **SK320**

LEGEND:

- - - - - PROPERTY BOUNDARY
- x ESTIMATED BICYCLE PARKING SPACES = 188
- RAMP



SCALE 1:100 AT ORIGINAL SIZE

PRELIMINARY

rev	description	app'd	date
A	ISSUED FOR INFORMATION	GB*	06.02.17

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PEREGRINE HEAD OFFICE
LEVEL ONE
INDICATIVE EOT FACILITIES



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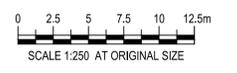
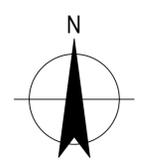
scale | 1:100 | for A1 | job no. | 33-18174
 date | FEB 2017 | rev no. | A

approved (PD) **SK321**



LEGEND:

- EXISTING
- EXISTING PROPERTY BOUNDARY
- POTENTIAL PROPERTY BOUNDARY (4.5m OFFSET)
- BASEMENT LEVEL FOOT PRINT
- GROUND LEVEL FOOT PRINT
- LEVEL ONE FOOT PRINT
- PLANTER BOX



PRELIMINARY

C	ISSUED FOR INFORMATION	GB*	06.02.17
B	ISSUED FOR INFORMATION	DM*	16.08.16
rev	description	app'd	date

PEREGRINE CORPORATION PTY LTD
PEREGRINE HEAD OFFICE
SITE LAYOUT
BUILDING ALIGNMENT

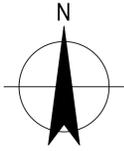


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 date | FEB 2017 | rev no. | C

approved (PD) **SK340**

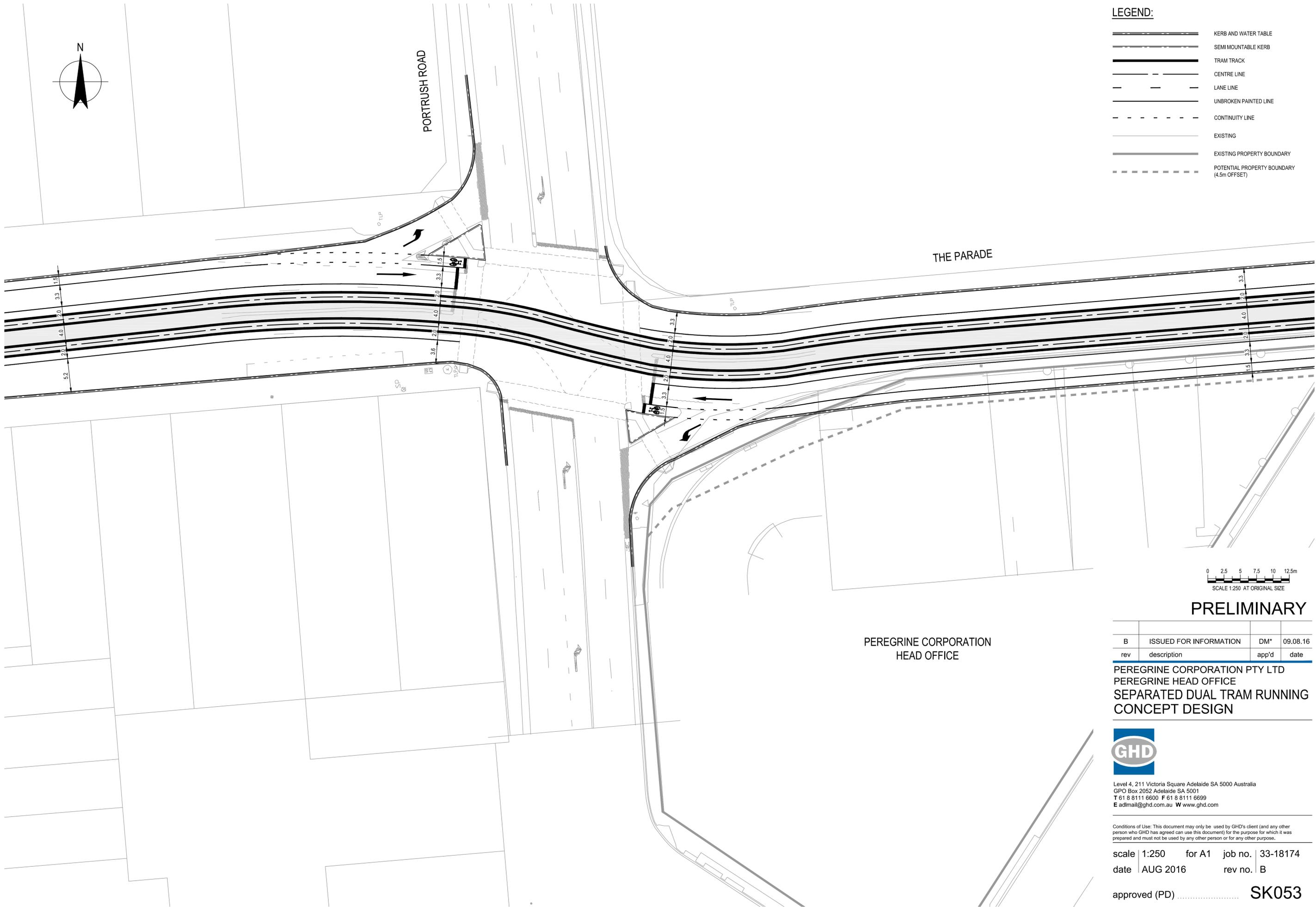


PORTRUSH ROAD

THE PARADE

LEGEND:

-  KERB AND WATER TABLE
-  SEMI MOUNTABLE KERB
-  TRAM TRACK
-  CENTRE LINE
-  LANE LINE
-  UNBROKEN PAINTED LINE
-  CONTINUITY LINE
-  EXISTING
-  EXISTING PROPERTY BOUNDARY
-  POTENTIAL PROPERTY BOUNDARY (4.5m OFFSET)



PRELIMINARY

rev	description	app'd	date
B	ISSUED FOR INFORMATION	DM*	09.08.16

PEREGRINE CORPORATION PTY LTD
 PEREGRINE HEAD OFFICE
 SEPARATED DUAL TRAM RUNNING
 CONCEPT DESIGN

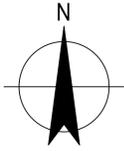


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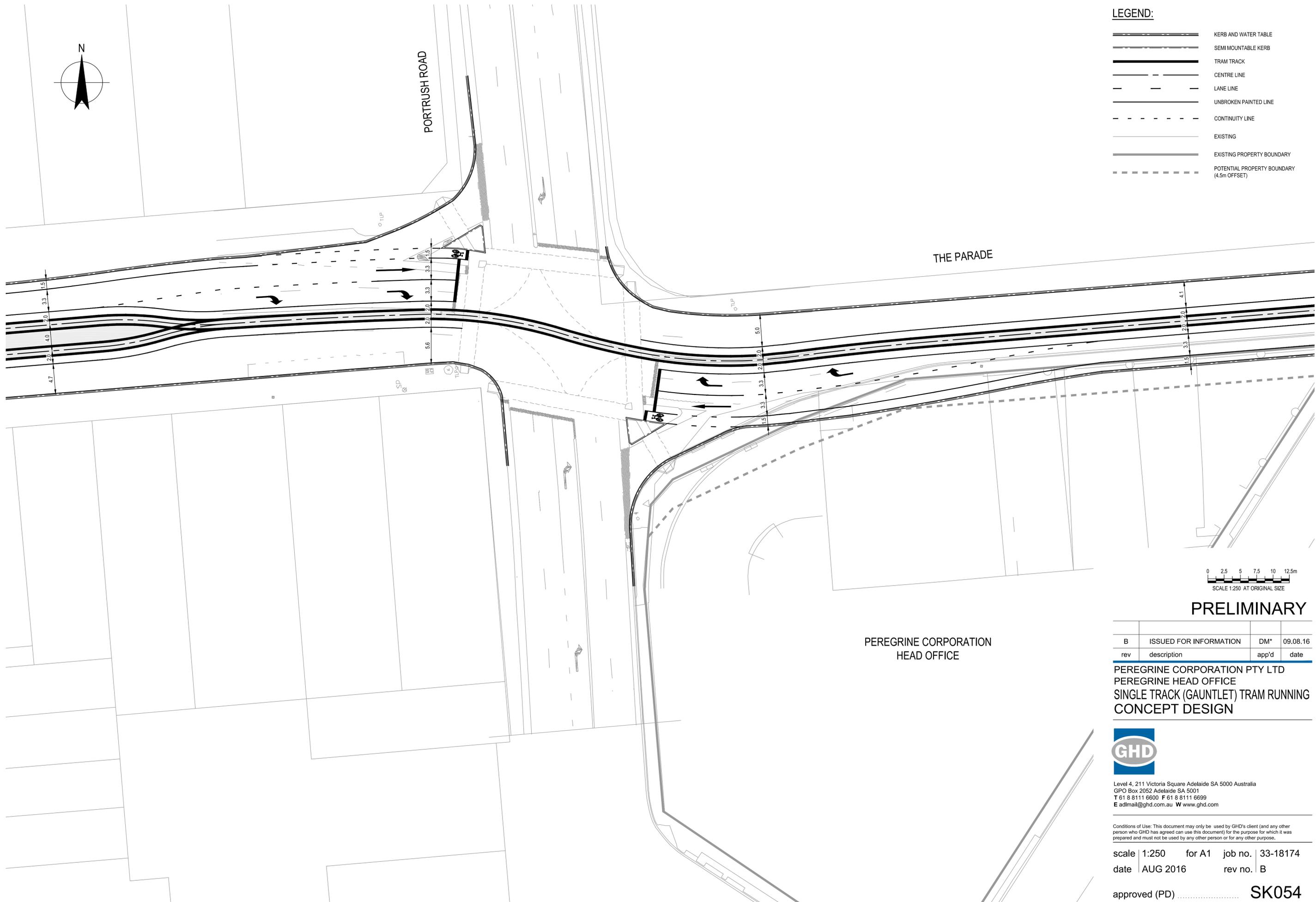
scale 1:250 for A1 job no. 33-18174
 date AUG 2016 rev no. B

approved (PD) SK053



LEGEND:

-  KERB AND WATER TABLE
-  SEMI MOUNTABLE KERB
-  TRAM TRACK
-  CENTRE LINE
-  LANE LINE
-  UNBROKEN PAINTED LINE
-  CONTINUITY LINE
-  EXISTING
-  EXISTING PROPERTY BOUNDARY
-  POTENTIAL PROPERTY BOUNDARY (4.5m OFFSET)



PRELIMINARY

PEREGRINE CORPORATION
HEAD OFFICE

rev	description	app'd	date
B	ISSUED FOR INFORMATION	DM*	09.08.16

PEREGRINE CORPORATION PTY LTD
PEREGRINE HEAD OFFICE
SINGLE TRACK (GAUNTLET) TRAM RUNNING
CONCEPT DESIGN

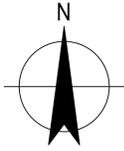


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date AUG 2016 rev no. B

approved (PD) SK054

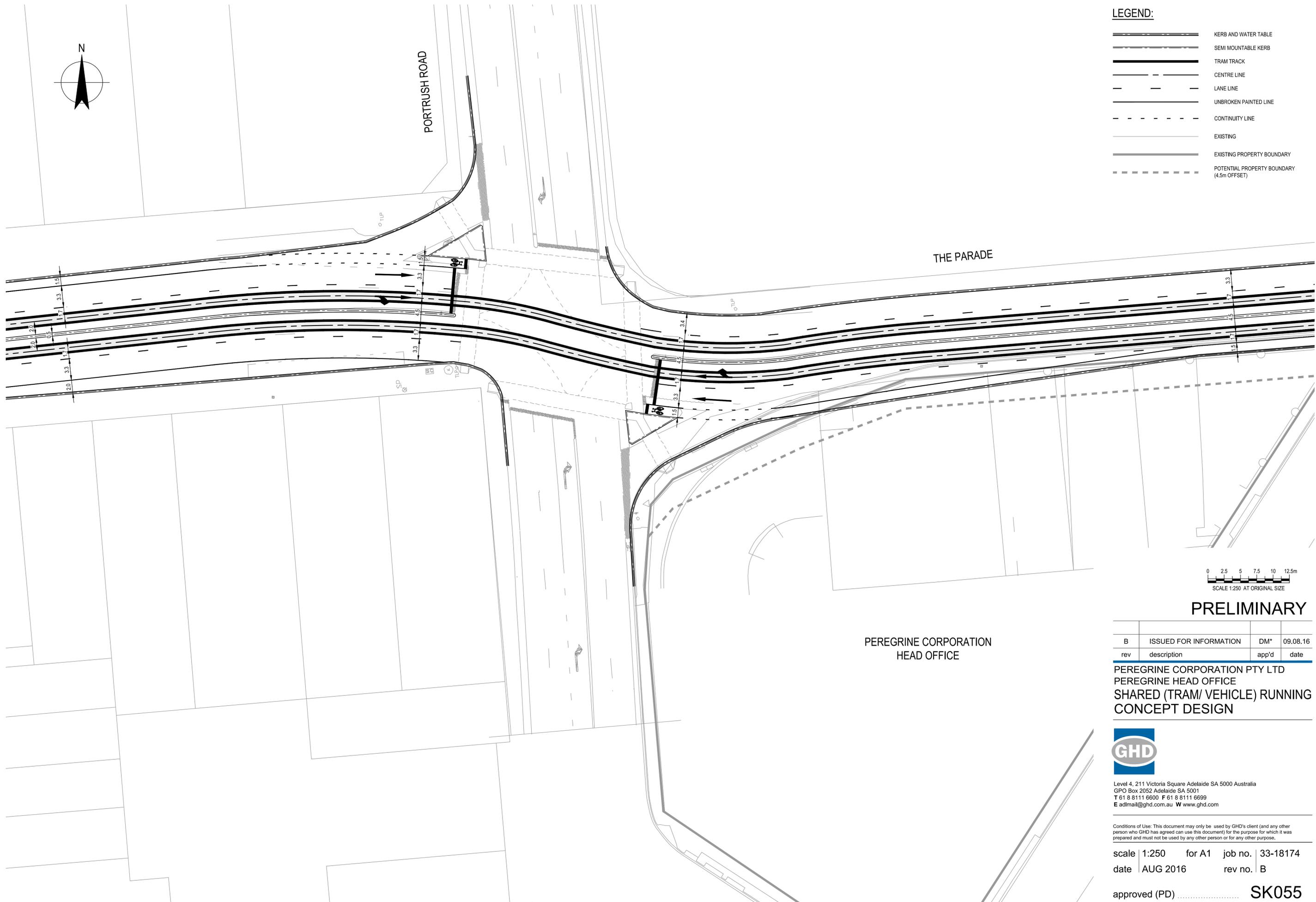


PORTRUSH ROAD

THE PARADE

LEGEND:

-  KERB AND WATER TABLE
-  SEMI MOUNTABLE KERB
-  TRAM TRACK
-  CENTRE LINE
-  LANE LINE
-  UNBROKEN PAINTED LINE
-  CONTINUITY LINE
-  EXISTING
-  EXISTING PROPERTY BOUNDARY
-  POTENTIAL PROPERTY BOUNDARY (4.5m OFFSET)



PEREGRINE CORPORATION
HEAD OFFICE

PRELIMINARY

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PEREGRINE CORPORATION PTY LTD
 PEREGRINE HEAD OFFICE
 SHARED (TRAM/ VEHICLE) RUNNING
 CONCEPT DESIGN



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approved (PD) SK055

GHD

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G:\33\18174\WP\Traffic Documents\2017-02-02 Revised Final Documents\2017-02-08 Final TAPIA Report for Peregrine HQ.docx

Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
	S. Hartland/ D. Murray	C. Dunn		C. Dunn		9-6-2016
A	G. Boumis	S. McDermott		N. Peters		7-2-2017

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APPENDIX F
PUBLIC SUBMISSIONS

Zuidland, Sara (DPTI)

From: DPTI:PD DAC & Major Developments Panel
Sent: Thursday, 6 October 2016 1:30 PM
To: Kerber, Laura (DPTI)
Subject: FW: Robert Kleeman, Submission re Peregrine Development

Sara Zuidland
Para-Planner
Development Division - Department of Planning, Transport and Infrastructure Tel 08 7109 7069 | Fax 08 8303 0753 | Email sara.zuidland@sa.gov.au

-----Original Message-----
From: Christel Mex [mailto:christelmex@gmail.com]
Sent: Thursday, 6 October 2016 1:26 PM
To: DPTI:PD DAC & Major Developments Panel <DPTI.PDDAC&MajorDevelopmentsPanel@sa.gov.au>
Subject: ATT: Robert Kleeman, Submission re Peregrine Development

Dear Mr Kleeman

Thank you for the opportunity to provide comment on the Peregrine Mixed Use Development at 270 The Parade, Kensington.

Whilst I appreciate the economic value that the development will bring to the local area, I strongly appose the seven stories proposed in the design. This height will severely overwhelm the state heritage listed buildings located on that corner, especially the iconic Clayton Church.

The nature of the design is very out of character for the historic conservation zone of Kensington, and would be more appropriate on Greenhill or Fullarton Roads where other corporate headquarters are located.

As a local resident and ward councillor, I ask that the design be reconsidered that will complement the historic nature of the area, and to reduce the excessive height of the proposed building.

This development, as it currently designed, will have a very negative impact not just in Kensington, but for the atmosphere of The Parade in Norwood.

Thank you for your consideration,

Christel Lorraine Mex
Kensington Ward Councillor
City of Norwood, Payneham & St Peters

PS - the views expressed in this email are my own.

Zuidland, Sara (DPTI)

From: DPTI:PD DAC & Major Developments Panel
Sent: Wednesday, 12 October 2016 9:40 AM
To: Kerber, Laura (DPTI)
Subject: FW: PEREGRINE DEVELOPMENT KENSINGTON

Sara Zuidland

Para-Planner

Development Division - Department of Planning, Transport and Infrastructure

Tel 08 7109 7069 | Fax 08 8303 0753 | Email sara.zuidland@sa.gov.au

From: vassos@internode.on.net [mailto:vassos@internode.on.net]
Sent: Tuesday, 11 October 2016 10:16 PM
To: DPTI:PD DAC & Major Developments Panel <DPTI.PDDAC&MajorDevelopmentsPanel@sa.gov.au>
Subject: PEREGRINE DEVELOPMENT KENSINGTON

I object to the construction of the proposed monstrosity by the Shahin Group on the corner of Norwood Parade and Portrush Road.

1. That corner is a Major hassle at the best of times with cars congesting the roads around the corner, particularly during school opening and closing times. Often a line of cars can be seen lined up from that corner, up The Parade to Shipsters Road.
2. At the moment Shahin employees cars are parked on the Parade between Bowen Street and Portrush Road, reducing the Parade to one lane of traffic at the lights. This puts undue pressure on the intersection meaning long delays for traffic travelling to the city along The Parade.
3. Buses also use The Parade (Quite a few) and these add to the congestion.
4. Portrush Road traffic gets priority and delays are even longer on the Parade. The addition of additional traffic from the proposed development will exacerbate the already frustrating traffic conditions on that corner.

Kensington is essentially a residential suburb and one of the oldest in Adelaide. There is no structure remotely resembling the proposed monstrosity. It is out of kilter with anything remotely close in that area. Where else is there such a building in Kensington ?

I appreciate the the Shahin family want to provide suitable premises for their business needs, but that corner is not the place. It does not cope with current traffic amounts, and would be a disaster with any additional traffic.

There would be sustained anger and frustration levelled at the Shahin family if the construction were to go ahead. God help us during the building phase. It would be a mammoth disaster and the community would be incensed with he disruptions to what is already a very congested and frustrating corner already!

The design and size of the building is totally unsuitable for that part of Adelaide and a more suitable site should be found in an industrial area of Adelaide.

Leo Vasilunas
 34A Regent St
 Adelaide

15/10/16

Dear Sir/Madam,

I would like to some comments regarding the proposed development at 270 The Parade, Kensington by Shahin Enterprises Pty Ltd T/A Peregrine Corporation.

I drive past the proposed development site at least ten times a week, and I am opposed to this development for two reasons.

Firstly, I believe it will create significant traffic problems around this intersection. There are already traffic issues on The Parade between the current Peregrine Corporation building and the Clayton Wesley Uniting Church where the road narrows, and I believe the addition of extra traffic coming to and from a development such as the one that is proposed will exacerbate the problem. Also, High Street gets extremely congested, especially at school pick drop off and pick up times. It is already quite a narrow street and when cars are parked on both sides, you often have to pull over and wait for a car that is travelling in the opposite direction to pass. Again, this situation could only get worse with an increase in traffic from a large development. Furthermore, it is quite common in the morning peak hour that vehicles travelling south on Portrush Road queue right up to the intersection of The Parade and Portrush Road. This I feel is currently at manageable levels, but I fear this development would worsen this problem.

Secondly, I believe the height of the proposed building is not in character with the area. On Portrush Road, there are few buildings higher than 2 storeys, and many residential buildings. A building as high as the one proposed is significantly different to anything else on Portrush Road, and is also far beyond what the zoning is for the area. I believe it would detract from the appearance of the beautiful Clayton Wesley Uniting Church.

Thank you for taking to time to listen to my views,

Yours sincerely,

Charlotte Hutchesson
Stepney

Zuidland, Sara (DPTI)

From: DPTI:PD DAC & Major Developments Panel
Sent: Monday, 17 October 2016 2:10 PM
To: Kerber, Laura (DPTI)
Subject: FW: 270 the Parade

Sara Zuidland
Para-Planner
Development Division - Department of Planning, Transport and Infrastructure Tel 08 7109 7069 | Fax 08 8303 0753 | Email sara.zuidland@sa.gov.au

-----Original Message-----

From: Queale [mailto:vivqueale@iprimus.com.au]
Sent: Monday, 17 October 2016 1:46 PM
To: DPTI:PD DAC & Major Developments Panel <DPTI.PDDAC&MajorDevelopmentsPanel@sa.gov.au>
Subject: 270 the Parade

Hello ,

I am wondering what I can do to protest at the proposed development of the south-eastern corner of the Parade and Portrush Road.

I have lived near Beulah road for 36 years and am very disturbed about the proposed 7 storey building that I understand is to be built on this corner.

It is totally out of keeping with the local historical amenity of the area. It is ugly and too high.

I don't suppose they could be persuaded to put it somewhere else? I know they have owned that Peregrine office for many years, but to put a glass/concrete private apartments AND swimming pool AND carpark there is wrong.

I suppose they have offered a lot of money to the powers that be and local opinion doesn't count.

Is there any effort coming from the council to halt this project?

Are there any local residents' groups which may be trying to stop this project?

thank you,

Vivien Queale

18 Toowong Av, Kensington Park 0402987578

Mr. Robert Kleeman
16th October 2016

15 Phillips Street
Kensington SA 5068

RECEIVED

20 OCT 2016

DAC

Dear Robert

We would like to submit a submission in opposition to the proposed Peregrine development on the corner of Portrush Road and The Norwood Parade.

We oppose the development for the following;

- overshadowing of our home
- adversely ^{impacted} our quality of life
- increase traffic movements in our street
- restrict parking, moreso than at present
- increase in noise levels
- impact on heritage of local area
- negative impact on home values
- height of building too high for this location

Vincenzo Corbo Emiliano Corbo

Zuidland, Sara (DPTI)

From: Julie Brennan <juliebrennan@adam.com.au>
Sent: Monday, 24 October 2016 1:19 AM
To: DPTI:PD DAC & Major Developments Panel
Subject: Peregrine Mixed Use Development – 270 The Parade, Kensington

Minister for Planning,
 Attention: Robert Kleeman, Unit Manager Strategic Development Assessment, Planning & Development,
 Development Division
 Department of Planning, Transport and Infrastructure,
 Adelaide, 5000

Re: Peregrine Mixed Use Development – 270 The Parade, Kensington

Dear Sir,

My family and I reside in High Street, Kensington.

Our home is a Contributory Item in a Historic Conservation Zone. We respect and value the protection this zoning provides our home and much of the built environment that surrounds us in the suburb of Kensington.

If we choose to make any changes to our home we are required to do so with council consent in accordance with the planning and heritage rules that apply to our land.

It is not equitable that Peregrine can apply to change the rules that apply to their land and those changes have the ability to so significantly impact homeowners in a residential suburb that is not zoned for buildings of the height and scale of the proposed development.

When assessing the Peregrine Mixed Use Development I respectfully ask that you consider the potential impact of -

1. The significant additional traffic that would use High St to enter and exit the proposed development. All traffic exiting the proposed development should be directed onto The Parade or Portrush Road to avoid significant impact on residential streets intended for local traffic.
2. The safety of pedestrians, particularly children around the two busy High Street school zones on what is essentially a narrow neighbourhood street.
3. Overshadowing, loss of privacy and increased noise on the local residents.
4. Inadequate onsite parking for the occupants including retail and hospitality staff and visitors to the proposed building. The suburb of Kensington already has many homes, schools and commercial premises that do not have access to adequate offstreet or visitor parking. Residents are already impacted by staff and visitors parking at commercial premises, the two schools on High Street and senior students parking at Mary MacKillop College.
5. The potential future request to change Bowen Street from a one way street to a two way street which would see many additional cars potentially using High Street as a means of cutting through local neighbourhood streets to avoid main roads and major intersections.

6. The bulk and scale of the building, particularly when looking to the west from many Kensington Streets. The heritage listed church steeple can currently be viewed from many streets including Phillips St, Bridge St and Maesbury St. If this development proceeds this valued heritage view would be lost.
7. Overlooking from upper floors of the proposed development over school grounds including Mary MacKillop College, St Ignatius Junior College and McKellar Stewart Kindergarten.
8. Overlooking from upper floors of the proposed development over the existing Norwood Outdoor pool.
9. Significantly higher future occupancy of the building, than that which is stated, given the likely future growth plans of Peregrine.

Subject to planning laws, in my opinion, a development of this scale would be better suited to a location such as the south eastern corner of the Greenhill Road and Fullarton Road intersection or the CBD.

Peregrine have invested a great deal of thought and planning in seeking to provide amenity for their staff. I respectfully ask that you provide a similar level of thought and consideration for the impact on my family, my neighbours and all residents of Kensington when considering this development application.

Yours faithfully

Julie Brennan

Sent from my iPad

Zuidland, Sara (DPTI)

From: Louise Brennan <louise.brennan0@gmail.com>
Sent: Sunday, 23 October 2016 9:07 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Fwd: Peregrine Developments Cnr Portrush Road & High Street, Kensington

Mr John Rau
Minister for Planning

Dear Mr Rau

We strongly object to Peregrine's Mixed Use Development Proposal. As local residents who will be significantly affected by this proposal we are alarmed that we have not been consulted with regards to this proposal. We strongly object to the proposal. It is not in keeping with the strong historic nature of Kensington.

Please see previous email to Norwood, Payneham, St Peters Council.

Your sincerely

Tracy Brennan
87 High Street
Kensington SA 5068
Mob: 0420 563 986

Date: Sun, Oct 23, 2016 at 3:46 PM
Subject: Peregrine Developments Cnr Portrush Road & High Street, Kensington
To: "townhall@npsp.sa.gov.au" <townhall@npsp.sa.gov.au>

To Whom it may concern,

I have been informed by a neighbour that a development plan has been submitted to Council for Peregrine site on the Corner of Portrush Road & High Street, Kensington.

Any developments increasing the volume of traffic on High Street and making traffic more congested around the corner of Norwood Parade and Portrush Road is of great concern and I would like an opportunity to lodge a objection to any such development. The development of high-rise apartments around High St is also not in keeping with the heritage nature of the area.

Assuming what I have been told is correct, is the Council going send out written notices to residents of High Street and surrounding areas to provide proper opportunity to provide input.

With thanks,

Simon Brennan

87 High St

Kensington SA 5068

Mob: 0406 384 133

Zuidland, Sara (DPTI)

From: Jo March <jo_spike@bigpond.com>
Sent: Saturday, 22 October 2016 8:25 PM
To: DPTI:PD DAC & Major Developments Panel
Cc: Andrew Dyson GPS
Subject: Peregrine Development Proposal - 270 The Parade, Kensington
Attachments: Submission_regarding_Peregrine_DA_Oct_2016.pdf

Attn: Robert Kleeman

Dear Sir,

I fully endorse the submission of the Kensington Residents Association (copy attached) urging the Development Assessment Commission to refuse the Peregrine development application.

The proposed development is clearly in contravention of the Norwood, Payneham and St Peters Development Plan and is not commensurate with the Kensington Historic Zone listing.

The proposed building is totally unsympathetic to the three State Heritage listed items on the other corners of the intersection.

It would exacerbate the existing traffic and parking problems in the area, with particular reference to the adjacent Mary MacKillop College.

And it's bloody ugly!

Yours sincerely,

Jo March
36 Thornton Street
Kensington SA 5068

Minister for Planning,
Attention: Robert Kleeman, Unit Manager
Strategic Development Assessment,
Planning & Development, Development
Division
Department of Planning, Transport and
Infrastructure,
Adelaide, 5000

The Secretary, -
Kensington Residents' Association Inc., -
Mr A Dyson, -
42, Regent Street, -
Kensington, 5068. -
20th October 2016. -

Re: Peregrine Mixed Use Development – 270 The Parade, Kensington

Dear Sir, -

Our Association is strongly opposed to the proposed development of the Peregrine site as it fails - to comply with numerous provisions of the Norwood, Payneham & St Peters Development Plan - 2016 (Development Plan). These include but are not limited to: -

- the excessive bulk and scale of the proposed building that will dominate this important location with three State Heritage items on the other three corners; and
- a significant and adverse impact on the adjacent Kensington Historic Conservation Zone and Kensington residents living adjacent or near the site;

It will also:

- increase traffic congestion on The Parade, between Portrush Road and Phillips Street; and
- increase parking and traffic problems in neighbouring streets in Kensington, Beulah Park and Norwood.

The proposed development is not in accordance with the Development Plan as recently approved by the Minister of Planning. The declaration of “major project status” is an attempt to subvert the Development Plan and is an example of very poor planning. The Development Plan is supposed to provide certainty to the community and developers alike but such an abuse of the system takes away this certainty and provides benefit only for those that have the influence to achieve major project status.

This proposal would provide windfall profits for the owners as the property was purchased based on its zoning. At the time it restricted development to two storeys.

It is noted that at various places in the Development Report the site is referred to as being in Kensington Park and Kensington Gardens. The failure to consistently identify that it is in fact in Kensington begs the question “*how reliable the report is?*”.

With reference to the relevant general and zone specific provisions of the Development Plan, we offer the following comments and objections:

Centres, Shops & Business – (City Wide)

PRINCIPLES OF DEVELOPMENT CONTROL

278 Provision for the movement of people and goods within business, centre and shopping zones or areas should comply with the following:

- (a) development should not cause inconvenient and unsafe traffic and pedestrian movements or be likely to result in the need for significant expenditure on transport and traffic works, or facilities within, or outside, the locality;*
- (d) access to car parking areas should be designed not to cause congestion or detract from the safety of traffic on abutting roads;*
- (h) on-site parking shall be determined having regard to:
 - (i) the amount, type and timing of movement generated by the use;**

282 Centres should have a minimal adverse impact on traffic movements on primary, or primary arterial, roads.

292 Development within business, centre and shopping zones should be located having regard to the following principles:

- (b) development should not generate pedestrian or vehicular traffic onto or across an arterial road in such a way as to materially impair the movement of traffic on that road or to cause safety hazards;*
- (c) development should not generate significant increases in traffic in adjacent residential areas;*

293 Development within business, centre and shopping zones should conform to the following access and car parking principles:

- (a) development should provide safe and convenient access for private cars, cyclists, pedestrians, service vehicles, emergency vehicles and public utility vehicles;*
- (b) access points onto public roads should be located and designed in such a way as to minimise traffic hazards, queuing on public roads and intrusion into adjacent residential areas;*
- (c) the number, location and design of access points onto arterial roads shown on Map NPSP/1 (Overlay 1) Parts A & B should be such as to minimise traffic hazards, queuing on the roads, right turn movements and interference with the function of intersections, junctions and traffic control devices;*
- (d) development should provide sufficient off-street parking to accommodate customer, employee and service vehicles;*

There are already significant traffic problems on The Parade, with traffic backing up past Bowen Street from Portrush Road for much of the day. At school pickup and peak hours, traffic is often banked up past Phillips Street. An entry and exit onto The Parade would further exacerbate the traffic problems. The traffic situation on The Parade will inevitably lead to queuing across the footpath creating a dangerous situation for the many pedestrians who walk down The Parade to Norwood.

There is also the probability that reflections and overshadowing from the proposed building will affect visibility at this major intersection having an adverse on impact road safety.

The proposal acknowledges that it provides less parking than required by the Development Plan. In addition it suggests that in future there may well be a move to convert other than the basement parking floors to office space! The proposal would generate significant extra parking requirements, over and above that planned for within the development. At present "On the Run" vehicles are often parked in Kensington and Beulah Park, well away from the Peregrine site. Residents in Bowen Street, Phillips Street and Marchant Streets complain of parking problems from Peregrine vehicles and employees vehicles, taking their street parking and at times parking across driveways. Peregrine employees are also known to park as far away from the Peregrine site as Thornton Street.

The development will also generate significant additional traffic in both High and Bowen Streets.

The traffic studies appear to have been done outside of school pickup times. The number of schools in Kensington and nearby streets in Norwood create significant traffic problems at school pick up times and these will be exacerbated.

280 *Landscaping should form an integral part of centre design, and be used to foster human scale, define spaces, reinforce paths and edges, screen utility areas, and generally enhance the visual amenity of the area. The use of locally indigenous plant species should be incorporated where it is practical to do so.*

The landscaping proposals are minimalistic at best and the landscaping along The Parade would be severely impacted by possible widening of the road as envisaged for introduction of trams. The applicant's track record in maintaining the very basic landscaping in the existing car park calls into question whether or not any proposed landscaping will be properly maintained.

284 *Centres should have minimal adverse impacts on residential areas.*

294 *Development within business, centre and shopping zones should conform to the following design principles:*

(d) Development should not cause nuisance or hazard arising from:

(iv) overlooking;

(v) overshadowing; or

(vi) visual intrusion.

300 *Industrial and commercial development in proximity to residential zones should not impair the amenity of those residential zones and points of entrance and exit should be located so that the number of vehicles using nearby roads in residential zones is kept to a minimum.*

The proposed development will have an adverse impact upon the nearby residential areas. There will be overlooking, overshadowing and visual intrusion for residents in Bowen Street, High Street and Phillips Street. It will be particularly bad for those living in Bowen Street. We are aware that one owner has already sold a Bowen Street property because of concerns about the adverse impact and a family renting in Bowen Street intends moving away if the development goes ahead.

Heritage – (City Wide)

OBJECTIVES

Objective 110: *Development that retains the heritage value of State and Local Heritage Places such that the heritage value of the place, locality and the Council area is reinforced through:*

- (a) the conservation and complementary development of such places; and*
- (b) the complementary development of land and sites adjacent to such places.*

Objective 111: *Development which conserves and reinforces the historic integrity of the Council area and is compatible with the desired character of the appropriate zone and policy area.*

PRINCIPLES OF DEVELOPMENT CONTROL

General

333 *Development (including land division) should not compromise or detrimentally affect the heritage value, character, integrity, setting, siting or function of buildings or sites of architectural, historic or scientific interest, sites of natural beauty or places of heritage value identified in Tables NPSP/5 and 6 as State or Local Heritage Places.*

Development on land adjacent to land containing a heritage place

345 *Development on land adjacent to land containing a State or Local Heritage Place as designated in Tables NPSP/5 and 6 should respect the heritage value, integrity and character of the heritage place and should clearly demonstrate design consideration of the relationships with the heritage place and its setting (without necessarily replicating its historic detailing) and the character of the locality by establishing compatible:*

- (a) scale and bulk;*
- (c) proportion and composition of design elements;*
- (d) form and visual interest (as determined by play of light and shade, treatment of openings and depths of reveals, roofline and pitch and silhouette, colour and texture of materials as well as detailing, landscaping and fencing);*

346 *Development on land adjacent to land containing a heritage place and sited in strategic locations, such as corners or at the termination of vistas, should have a scale and visual interest in the streetscape at least equal to that of the adjoining heritage place, providing the heritage value of the place within its setting is not diminished.*

347 *Development on land adjacent to land containing a State or Local Heritage Place should not be undertaken if it is likely to dominate or detract from the heritage value and integrity of the heritage place by way of design, appearance or standard of construction.*

The proposed development fails to meet the above objectives and principles with regard to its impact on adjacent State and Local Heritage places. At various places in the development report the building is claimed to be of seven storeys, including in the heritage impact assessment. With a ground floor, seven acknowledged levels and the roof level that is effectively two storeys in height, the building is in reality ten storeys high.

The bulk and scale are massive and the proposed building will dwarf the State Heritage listed buildings on the other three corners of the intersection and make them insignificant. On this basis alone the application should be rejected.

BUSINESS ZONE

Introduction

The objectives and principles of development control that follow apply to the Business Zone shown on Maps NPSP/9, 10, 21 and 22. Further principles of development control also apply to policy areas that are relevant to the zone. The combined provisions for the zone and its related policy areas are additional to the City Wide provisions expressed for the whole of the council area.

PRINCIPLES OF DEVELOPMENT CONTROL

Non-complying Development

12 *The following kinds of development are non-complying in the Business Zone:*

The change in the use of land to, or the erection, construction, conversion, alteration of or addition to a building for the purposes of, the following:

Indoor Recreation Centre

Office with gross leasable area greater than 250 square metres, except in the West Norwood Policy Area

Shop or group of shops with a gross leasable area greater than 250 square metres

DESIRED CHARACTER

Kensington Policy Area

Kensington Policy Area occupies a key location at the corner of The Parade and Portrush Road. Development should comprise high quality offices, consulting rooms and retail showrooms.

The corner of The Parade and Portrush Road is a visually prominent site within the city and any new building should be of massing and configuration which visually reinforces the corner, whilst respecting the scale of buildings in the adjacent Historic (Conservation) Zones and maintaining the prominence of the State Heritage listed buildings on the south-western, north-eastern and north-western corners of the intersection of Portrush Road and The Parade.

The Parade and Bowen Street should provide the primary points of access for delivery, service and visitors' vehicles. The creation of new vehicle access points onto either Portrush Road or the portion of The Parade close to the Portrush Road intersection should be avoided.

PRINCIPLES OF DEVELOPMENT CONTROL

4 *Development adjacent to the Kensington 1 and Kensington 2 Policy Areas of the Residential Historic (Conservation) Zone should be compatible in design and scale with the character sought for that Zone and those Policy Areas.*

7 *Development in the Business Zone should not exceed two storeys in height above mean natural ground level, except where identified in the West Norwood Policy Area and the Magill Road West Policy Area, where development incorporating a residential component above ground level non-residential land use/s, should not exceed three (3) storeys above natural ground level.*

Principle 12 lists non-complying developments in the zone. These include, an indoor recreation centre, offices with a leasable area greater than 250 square metres and shops with a leasable area greater than 250 square metres. The proposed development clearly contravenes these conditions of this principle.

Rather than reinforcing the corner with a building that respects the scale of the buildings in the adjacent Historic Conservation Zones and maintaining the prominence of the State Heritage listed buildings, the proposed building will completely dominate the intersection and neighbouring streets, dwarfing the three State Heritage items on the intersection and also detract from the State Heritage listed Benson Fountain on the corner of High Street and Portrush Road.

Contrary to the desired character statement that discourages the creation of new vehicle access points on the two major roads, the proposal has a major entry and exit point on The Parade. This would further exacerbate the existing traffic problems on The Parade as previously indicated.

It is not compatible in either design or scale with the character sought for the Kensington Historic Conservation Zone.

Principle 7 quite specifically states that development in the Kensington Policy Area of the Business Zone should not exceed two storeys in height above ground level. This proposal for a ten storey building is in such direct contravention of this principle that it should be rejected outright.

The Heritage Assessment Report is inconsistent. In some places it indicates there are two Contributory Items in Bowen Street, namely Nos 6 and 8 Bowen Street. In other places it only refers to No 8 Bowen Street as a Contributory Item.

Other Comments:

It is noted that the proposed swimming pool extends beyond the boundary of the site and overhangs The Parade.

Conclusion:

In conclusion we stress that this development application is at serious variance with the Norwood Payneham and St Peters Development Plan 2016 for the following reasons:

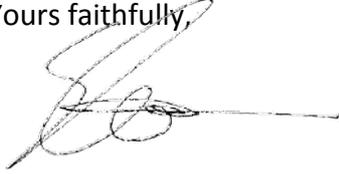
- the proposal is for a building that is the equivalent of ten storeys, whereas it is zoned for two storey development;
- it will dominate this important location and dwarf with three State Heritage items on the other three corners and the State Heritage listed Benson Memorial Fountain;
- it will have a significant and adverse impact on the adjacent Kensington Historic Conservation Zone and Kensington residents living adjacent or near the site;
- it will significantly increase traffic congestion on The Parade between Portrush Road and Phillips Street;
- it will increase parking problems in neighbouring streets in Kensington, Norwood and Beulah Park;
- the proposal includes three non complying uses within the Business Zone; and
- it is a gross overdevelopment of the site.

Accordingly, our Association requests that the Development Assessment Commission reject the development application, as to approve this development would be to throw away the existing planning rules that have been established by Council and Government to provide for orderly and

appropriate development. This development may be appropriate for the Central Business District or Greenhill Road, but is not appropriate on this site, the gateway to the Kensington Historic Zone and one of the key intersections in the Eastern suburbs with its three State Heritage items.

Our Association requests that we be given the opportunity to address the Commission when the matter is considered.

Yours faithfully,



Stewart Caldwell
President (0402 044 118)



Andrew Dyson
Secretary (8331 9654)

cc City of Norwood, Payneham & St Peters,
City of Burnside,
NPSP Mayor & Councillors,
Mr Steven Marshall, Member for Dunstan,
Mr Steven Griffiths, Shadow Minister for Planning,
Local Government Association of South Australia,
Norwood Residents' Association,
St Peters Residents' Association,
Community Alliance SA,
National Trust of South Australia,
Environmental Defenders Office.

Shirley Rowe
3 Marchant Street, KENSINGTON

23/10/2016

Minister for Planning,
Attention: Robert Kleeman, Unit Manager Strategic Development
Assessment, Planning & Development, Development Division
Department of Planning, Transport and Infrastructure

Dear Sir,

COMMENTS ON THE PROPOSAL DOCUMENTS - PEREGRINE CORPORATION MIXED USE DEVELOPMENT – 270 THE PARADE, KENSINGTON

Please refer to my comments (in bold) below about particular issues arising from the proposal documents and some inconsistencies about parking noted in the documents.

1. Parking Issues

1.1 Fyfe Pty Ltd letter dated 16 August 2016

Page 4 first para – “Clarification in relation to the car parking arrangements: we note that the non-secured car park will be available for patrons of the retail, café, and other commercial facilities and services provided at Level 7, as described in the revised GHD report.”

1.1.1 There are currently 310 staff working daily at this site and only 41 car parks. There are currently 6 visitors’ car parks. There are no figures for the number of staff attending for training and no mention in the report of where all these people currently park. The local streets in Beulah Park and Kensington are taken up with the cars of the employees/trainees. The number of employees is expected to rise to 400 in the future. The training theatre seats 350 people. Due to the streets being used by the Peregrine employees currently, visitors of residents are not able to park adjacent to their homes. This is not satisfactory for the residents of Kensington and Beulah Park. From my own experience, visitors have had to park a block away if they visit on a week day due to parking in Marchant Street or Phillips Street being taken over by workers/trainees. It also affects parking for trades people attending to residents’ needs.

1.1.2 94% of 164 respondents to a survey conducted by GHD (Appendix L Para 2.7 Existing Staff Travel Patterns) use a motor vehicle to get to work. There are not enough existing car parks for the employees/trainees and there will still not be enough provided in the proposal. This development is more suited for a city address so that staff/trainees can use public transport.

1.1.3 Local councils should not have to be providing parking in local streets for a commercial development to the detriment of the residents. A major failure of the GHD investigation is the lack of information on where employees currently park. There are only 41 car parks now but currently 310 employees. Why has this point been missed in their report? The Norwood, Payneham & St Peters Council (NPSP) require the assessment of usage of on-street parking in development applications. This major development should also have to meet a similar requirement of a proper assessment, not just use the discount formula calculated from the NPSP Development Plan, ie GHD Report sub-para 7.4 Discount Factors pp. 35, 36 and 37.

1.2 Fyfe Development Report sub-para 3.1 Land Use and Key Features Pages 11, 12 - Total car parking spaces in Basement, Ground Floor, Levels 1 and 2 = 296 cars including 38 secure spaces) plus 12 motor bike parks.

and

Fyfe Development Report sub-para 3.6 Access and Parking

Page 18 - "The 51 secured car parking spaces within the basement are to be only available to vehicles owned and/or operated by Peregrine Corporation. All other parking spaces will be available for staff and customers of the retail, café, restaurant and other facilities of the integrated building design, as described in GHD's report."

1.2.1 This statement shows that there will be even less parking for employees. Secure parking has increased to 51 but GHD's assessments were calculated using 38 secure car parks.

1.3 Fyfe Development Report sub-para 3.1 Land Use and Key Features

Page 12 last para - "From a longer term perspective, the floor to floor heights of the above ground car parking levels have been designed so that ultimately such floors could be converted into further office space (subject to future required approvals)."

1.3.1 An increase in numbers of staff will lead to less car parking being available for staff and more on-street parking. There is 8440sqm of office space which allows an average of 27sqm (based on 310 staff) per person. The Building Code of Australia suggests 10sqm/person. I would suggest that some of the apparent excess office space could be used as extra car parking to meet the current conditions of no tram line and the use of on-street parks to make up their shortfall of parking spaces. As has been stated above, car parking can be converted in the future for offices but, I would add a condition of only after the tram line is built.

1.4 Fyfe Development Report sub-para 4.3.5 Employment Guideline 9

Page 40 - "Jobs at completion

The redevelopment of the site in South Australia will support the retention of 249 jobs, and allow for the expansion of the business with an additional 160

new jobs likely to be created at the head office over the next 10 years, together with 60 jobs associated with the retailing component. All up approximately 470 jobs are anticipated on an ongoing basis.”

1.4.1 The car parking numbers do not take into account the extra 60 people who will be working in the retail shops included in the proposal.

1.5 Appendix L Traffic Report prepared by GHD sub-para 7.9 Parking rate conclusion

Page 39 - “It is acknowledged that the proposed supply of 297 car parking spaces does not meet the discounted Council’s Development Plan requirements; however, the emphasis in this proposal is about the nexus with the Central Business District of Norwood and the community expectation for parking supply while supporting a shift toward active and sustainable transport modes.”

1.5.1 The community expectation for parking supply in the areas surrounding this proposed development would be to have no Peregrine employees/trainees parking in their streets. The survey of travelling routes of respondents show that the majority are arriving from north or south along Portrush Road, therefore, an east west tram line will not assist with decreasing the need for car parks. Only 13.5% of respondents travelling from the west along The Parade could possibly use the tram line. The survey should have asked staff why they don’t currently use public transport.

2. Inconsistencies Noticed in Statements about Parking

2.1 Parking spaces – in one document 38 secure parks are stated and also used in the Comparative Assessment of parking space numbers. Whereas in another document, it is stated that there will be 51 secure parks. This means even less parking spaces for general use. Refer to my comments above under Parking Issues generally and sub-para 1.2.

2.2 Staff Survey – Approximately 94% of 164 respondents to the survey out of 310 total employees drive to work and only 0.6% ride a bicycle. How do they justify the 120 bicycle space?

The Staff Survey results and the existing parking spaces should have raised the question of where the overflow currently park.

2.3 Staff Numbers – Calculation of the provision of parking spaces has not taken into account the extra 60 people working in the retail spaces of the development

2.4 Trainees -

Appendix L Traffic Report Prepared by GHD sub-para 7.4 Discount Factors

Page 35 - “Namely, the parking supply should be available for;

- 100% of the Office /Commercial use;

- 100% Retail;

- . 10% of the Café use as custom will generally be from the retail of commercial areas;

- 50% of the Restaurant use for the lunch trade with the shared use of other existing spaces in the evening and week end trade period;

- 90% Training demand with the majority of **off-site employees in attendance**;

- 10% of the Meeting Rooms demand as the majority of use will be internal commercial;

- 10% of Gymnasium demand due to the high use pre and post office hours;

- 20% for the Training Theatre due to the overlap with other internal training/ meeting supply and the **potential use after hours**;

As detailed in Table 12 based upon these parameters the recommended parking supply is **360** parking spaces.”

2.4.1 The Training Theatre seats 350 people. The expectation is that the majority of attendees will be from other sites. Where are all of these extra people going to park?

2.5 Change to the Number of Parking Spaces

Fyfe Development Report – Appendix A Development Report Guidelines

Page 3 – “2. Description of Proposal

- *314 car parking spaces and 90 bicycle parks”*

and

*Fyfe Development Report – Table 6.1 – Development Plan Considerations
Para 8. Movement, Transport and Car Parking*

*Page 52 – “In relation to car parking, GHD estimate that the proposed development would generate a theoretical demand for at least **447** spaces.*

However Principle 122 identifies that lesser car parking rates can apply in certain situations, including:

- *Sites located within 200 metres walking distance of public transport. This is likely to be relevant when the tram line is expanded; and*
- *Mixed use buildings where there is a potential for shared parking across a range of uses occurring at different times.*

Having regard to the above, GHD consider that the theoretical car parking demand is 360 spaces. Whilst the proposed provision of car

parking supply does not achieve the 360 spaces sought, GHD consider that:

the emphasis in this proposal is about the nexus with the Central Business District of Norwood and the community expectation for parking supply while supporting a shift toward active and sustainable transport modes.

GHD further note that “the design creates stronger pedestrian and cycling facilities and improved amenity” and that “a number of other established Office/Commercial developments within the Norwood CBD similarly under subscribe in car parking provisions with an emphasis on the use of public transport”.

2.5.1 Why has there now been a decrease in the number of car parking spaces when compared to their original proposal and other calculations? It is very unlikely that the tram line will be constructed within the future time considerations used by GHD due to the cost of such a project. Discounting of the number of car parks should not be allowed due to the non-existence of the tram line. There is currently public transport close to this site and still 94% of the staff surveyed drive. This development is more suited to a city location which is the hub of public transport and can cater for the proposed number of staff and trainees.

3. Vehicular Access

3.1 Fyfe Development Report sub-para 3.6 Access and Parking

Page 17 - “Access points for vehicles will be located off the following roads:

- The Parade (left-in, left-out)*
- High Street (all movements); and*
- Bowen Street, with entry via High St and exit on The Parade– with access for service vehicles into the building. EOT facilities will also be accessible via Bowen Street.”*

3.1.1 Access onto The Parade - This section of The Parade is very busy with cars forming 2 lanes leading to the Portrush Road intersection at peak times in the morning and afternoon. The afternoon peak time sees traffic building into 2 lanes past the proposed car park entrance/exit and to east of Bowen Street.

3.1.2 Currently only one lane can form along The Parade during unrestricted parking hours which restricts traffic flow through the intersection. Only a short 2 lane section can form as the existing locations of “No parking” times are not restrictive enough so traffic builds up at peak times of the morning and afternoon to form a queue past Phillips Street and also up to Thornton Street, Kensington, if not further east on The Parade. There are 2 peak times in the afternoon, ie from 3.30pm school pick up and then 5.00pm onwards. Delivery trucks will have difficulties at many times of the day when merging into The Parade.

3.1.3 How will vehicles egressing from the proposed car park entrance move into the PM traffic queue. Going by the Predicted Staff Traffic Distribution PM Peak diagram 5 at p.15 Appendix L GHD Traffic Report, 94 vehicles will exit from The Parade car park and 70 of the 94 vehicles will have to turn right at Portrush Road. How will they merge to the right lane? Will a queue form in the car park due to holdups caused by difficulty in moving into the 2 lanes of traffic at the Portrush Rd intersection? Has this been taken into account in their calculations?

3.1.4 As mentioned above in the comments about the current on-street parking, access into and egress from Phillips Street and other streets in Kensington and Beulah Park and possibly Norwood, have not been taken into account. There are currently 41 parking spaces and 310 employees plus the trainees. There does not appear to have been an investigation into where all these people currently park and where the overflow from the proposed car parks will park in the future. As there is not sufficient parking supplied in the proposed plans, an assessment of traffic in these streets should also be supplied.

3.2 Appendix L – GHD Traffic Report sub-para 3.3 Traffic Circulation

*Page 13 – “Traffic circulation at the site is projected to remain as a predominantly anticlockwise rotation based upon median restrictions affecting turning movements and the Bowen Street ‘one way’ orientation heading north. The existing driveway crossovers in Bowen Street and High Street will be closed with new facilities to be constructed to cater for the swept path of vehicles entering the car park areas. Access and egress will also be available via The Parade, which is restricted by **an existing median** that will mean access will be via left in and left out vehicle movements.”*

3.2.1 The existing median strip would not restrict movement from the proposed car park as the existing median strip does not extend that far back from Portrush Road. The median strip ends a little east of the church spire. The plans show the entrance to the car park as being opposite the church hall where there is no median strip, only a solid white line. This could allow vehicles to turn right out of the car park.

4. Built Form and Height

4.1 Fyfe Development Report sub-para 3.2 Design Statement

Page 13 - “MPH state that the ambition of the design is to provide a “healthy and sustainable workplace for staff”, a “landmark for the locale as well as a gateway into The Parade” as well as a design that is respectful of the local context and public realm, including the potential future road widening of The Parade.”

4.1.1 I do not see how the design is at all respectful of the local context. It certainly is a landmark building but is definitely not in sympathy with the heritage of the area. It would look fabulous at Outer Harbour due to its cruise liner characteristics.

4.2 Fyfe Development Report sub-para 3.3 Built Form and Height

Page 13 – “3.3.1 Height and Verticality - The podium of the building is proposed to be of a height of approximately 15 metres. The podium levels include floor to floor heights ranging between 3.6 and 4.2 metres. The levels above the podium have a floor to floor height of 4.2 metres. As described by MPH, the “height of the podium is reflective of The Parade’s general streetscape” – where buildings are typically of a height of two storeys or equivalent – and “massing of the church”.”

4.2.1 See the following are extracts from the NPSP Development Plan 2016:

**“DESIRED CHARACTER
Kensington Policy Area**

Kensington Policy Area occupies a key location at the corner of The Parade and Portrush Road. Development should comprise high quality offices, consulting rooms and retail showrooms.

The corner of The Parade and Portrush Road is a visually prominent site within the city and any new building should be of massing and configuration which visually reinforces the corner, whilst respecting the scale of buildings in the adjacent Historic (Conservation) Zones and maintaining the prominence of the State Heritage listed buildings on the south-western, north-eastern and north-western corners of the intersection of Portrush Road and The Parade.

PRINCIPLES OF DEVELOPMENT CONTROL

4 Development adjacent to the Kensington 1 and Kensington 2 Policy Areas of the Residential Historic (Conservation) Zone should be compatible in design and scale with the character sought for that Zone and those Policy Areas.

7 Development in the Business Zone should not exceed two storeys in height above mean natural ground level, except where identified in the West Norwood Policy Area and the Magill Road West Policy Area, where development incorporating a residential component above ground level non-residential land use/s, should not exceed three (3) storeys above natural ground level.

9 Development should incorporate architectural features and variations in set-back on street frontages so as to break-up facades and enhance the streetscape. Long, continuous facades of greater than 20 metres should not be developed.”

4.2.1 MPH states that buildings are typically of a height of two storeys or equivalent in this area. This area is zoned for business and should only be 2 storeys in height as per Principle 7 above.

4.2.2 I don’t consider this proposal respects the scale of the heritage buildings. The heritage buildings have a vertical height that is being matched by the proposal but the mass of the proposal far exceeds the mass of adjacent buildings. Aesthetically, I think, this proposal overshadows the heritage buildings. The benefits of the set backs to provide a less bulky appearance seem to be lost under the addition of the glass panels. The glass shields do not appear to lessen the bulk and mass.

4.3 Fyfe Development Report Appendix H – Design Statement Prepared by MPH - Schedule of materials, finishes and colours

“The podium element is constructed with an external façade comprising of sandstone cladding and expressed black metal trim and sun screening, and vertical clad stone fins to the ground floor carpark. The stone is used to reference the colour and texture of the historic fabric of the area, and in particular, the adjacent church.”

4.3.1 The sandstone may be a suitable choice for the podium to reference the heritage buildings but I don't understand the choice of the black metal trim. That colour doesn't have any relationship to the adjacent area and looks too dark and bold for the location.

5. Noise

5.1 Fyfe Development Report Para 3.6 Access and Parking

Page 17 - “Service vehicles will enter and exit the building via Bowen Street. A loading zone for deliveries will be located at ground level. A separate loading area will be located within the basement level car parking area.”

and

Fyfe Development Report Appendix T Sonus Noise Assessment – Para 5 Conclusion – Page 12 -

- *“Restriction of loading activity to between 7am and 10pm in the designated area only;*
- *Ensuring engines and refrigeration units are turned off when in the designated loading area;*
- *Ensuring loading and unloading activity does not utilise a forklift;”*

5.1.1 There are residents in Bowen Street who will be affected by the sound of the reversing trucks' warning signals. Are the earliest and latest times expected for the arrival and departure of the service vehicles really satisfactory for the residents in Bowen Street? Will the service vehicles be attending 7 days a week? I understand that there is already a problem caused by the sound of trucks which affects the amenity of the residents. Will trucks be reversing? What is the decibel rating of reversing warning signals on trucks?

5.1.2 The plans make note of the residential aspect of Bowen Street and have tried to improve the amenity by moving the loading area further away but there are other residences that have not been noted on Appendix A Site Locality in the Sonus report (Appendix T). People also live in townhouses on the SE corner of Bowen Street, at the units on the NE corner of The Parade and Bowen Street and at 6 Bowen Street.

6. LANDSCAPING

The landscaping may look good for a while but the current state of their small amount of existing landscaping does not give me confidence

about future maintenance and continued interest by the company in the landscaping on a long term basis.

7. PEDESTRIAN AND CYCLIST SAFETY

7.1 Fyfe Development Report - 4.3.2 Traffic Impact Guideline 6

Page 34 "Adequacy of the existing pedestrian facilities

As noted by GHD, the proposed building includes an "extensive paved/landscaped forecourt of approximately twenty (20) metres in depth from the existing kerbing to the office building, retail and café entrances and approximately eight (8) metres on the Portrush Road boundary and approximately eleven (11) metres on The Parade boundary".

The proposal also improves amenity and safety for pedestrians and cyclists by removing the existing car parking area from the north-west quadrant of the site, and by providing greater clearance from the intersection.

For these reasons, GHD considers that the proposal "significantly improves pedestrian safety and amenity".

7.1.1 Will there be a bicycle lane along the The Parade continuing the full length east from the Portrush Road intersection? What will happen if the intersection is widened – how will the bicycle lane be retained?

8. CONSEQUENCES OF PROPOSAL NOT PROCEEDING

8.1 Fyfe Development Report - 5.4 Consequences of proposal not proceeding

Page 44 - "Should the proposal, not proceed, the following consequences are foreshadowed:

- The existing constrained accommodation will continue to impact on the efficient administrative function of the Peregrine Corporation;*
- The amenity for both workers and visitors to Peregrine Corporation will remain challenged; and*
- External consequences arising from a lack of on street car parking will continue to impact on the amenity of the locality."*

8.1.1 Finally a comment about the existing on-street parking problems! The best solution for Peregrine and the surrounding area is for them to move to a suitable location. The degree of economic boost to the traders on The Parade will be limited as the tenancies of the proposed development are Peregrine businesses except for two tenancies (I refer to the document about signage – Appendix K).

SUMMARY

The development should not proceed until the following problems are addressed:

1. Provision of the calculated number of car parks – 447 spaces.
2. Have an assessment of the impact of this proposal on residents due to the on-street parking issue that will continue if more car parking spaces are not provided in the proposed development.
3. Have a design that is respectful of the local context – the proposal appears to be a landmark building which will aesthetically and physically overshadow the State Heritage buildings. This design is not appropriate for this prominent location.
4. Unless there is quick egress at the car park entrance on The Parade during the peak times, there could be an unacceptable number of cars in the proposed car parks queuing to make their departure. Queuing within the car park when departing from the High Street car park could also be affected by the amount of south flowing peak hour traffic on Portrush Road. This proposal will cause even more congestion around this very busy intersection.
5. There are 2 letters from Office Design and Architecture SA (ODASA) dated 13 April 2016 and 24 May 2016 which suggest there are problems with the design. There is no final letter included in the Development Report by ODASA – did ODASA accept or reject the plan?

PHOTOGRAPHS TAKEN ON 21/10/16 AT 5.20PM TO SHOW TRAFFIC QUEUING AND MEDIAN STRIP LENGTH



5.20pm 21/10/16 - Queue east of Bowen Street on The Parade to Phillips Street



5.20pm 21/10/16 - Queue on The Parade – double lane forming.



5.20pm 21/10/16 - The Parade – only a white line at the position of the proposed car park entrance.



5.20pm 21/10/16 - The Parade median strip does not extend back to Bowen Street.



5.20pm 21/10/16 - The Parade queue extending east past Bowen Street. A legally parked car which restricts forming of 2 lanes.



5.20pm 21/10/16 – The Parade looking west, at Bowen Street showing build up of vehicles and formation of 2 lanes at the position of the proposed car park entrance.

Yours faithfully,

Shirley Rowe

Minister for Planning,
Attention: Robert Kleeman, Unit Manager
Strategic Development Assessment,
Planning & Development, Development
Division
Department of Planning, Transport and
Infrastructure,
Adelaide, 5000

The Secretary, -
Kensington Residents' Association Inc., -
Mr A Dyson, -
42, Regent Street, -
Kensington, 5068. -
20th October 2016. -

Re: Peregrine Mixed Use Development – 270 The Parade, Kensington

Dear Sir, -

Our Association is strongly opposed to the proposed development of the Peregrine site as it fails - to comply with numerous provisions of the Norwood, Payneham & St Peters Development Plan - 2016 (Development Plan). These include but are not limited to: -

- the excessive bulk and scale of the proposed building that will dominate this important location with three State Heritage items on the other three corners; and
- a significant and adverse impact on the adjacent Kensington Historic Conservation Zone and Kensington residents living adjacent or near the site;

It will also:

- increase traffic congestion on The Parade, between Portrush Road and Phillips Street; and
- increase parking and traffic problems in neighbouring streets in Kensington, Beulah Park and Norwood.

The proposed development is not in accordance with the Development Plan as recently approved by the Minister of Planning. The declaration of “major project status” is an attempt to subvert the Development Plan and is an example of very poor planning. The Development Plan is supposed to provide certainty to the community and developers alike but such an abuse of the system takes away this certainty and provides benefit only for those that have the influence to achieve major project status.

This proposal would provide windfall profits for the owners as the property was purchased based on its zoning. At the time it restricted development to two storeys.

It is noted that at various places in the Development Report the site is referred to as being in Kensington Park and Kensington Gardens. The failure to consistently identify that it is in fact in Kensington begs the question “*how reliable the report is?*”.

With reference to the relevant general and zone specific provisions of the Development Plan, we offer the following comments and objections:

Centres, Shops & Business – (City Wide)

PRINCIPLES OF DEVELOPMENT CONTROL

278 Provision for the movement of people and goods within business, centre and shopping zones or areas should comply with the following:

- (a) development should not cause inconvenient and unsafe traffic and pedestrian movements or be likely to result in the need for significant expenditure on transport and traffic works, or facilities within, or outside, the locality;*
- (d) access to car parking areas should be designed not to cause congestion or detract from the safety of traffic on abutting roads;*
- (h) on-site parking shall be determined having regard to:
 - (i) the amount, type and timing of movement generated by the use;**

282 Centres should have a minimal adverse impact on traffic movements on primary, or primary arterial, roads.

292 Development within business, centre and shopping zones should be located having regard to the following principles:

- (b) development should not generate pedestrian or vehicular traffic onto or across an arterial road in such a way as to materially impair the movement of traffic on that road or to cause safety hazards;*
- (c) development should not generate significant increases in traffic in adjacent residential areas;*

293 Development within business, centre and shopping zones should conform to the following access and car parking principles:

- (a) development should provide safe and convenient access for private cars, cyclists, pedestrians, service vehicles, emergency vehicles and public utility vehicles;*
- (b) access points onto public roads should be located and designed in such a way as to minimise traffic hazards, queuing on public roads and intrusion into adjacent residential areas;*
- (c) the number, location and design of access points onto arterial roads shown on Map NPSP/1 (Overlay 1) Parts A & B should be such as to minimise traffic hazards, queuing on the roads, right turn movements and interference with the function of intersections, junctions and traffic control devices;*
- (d) development should provide sufficient off-street parking to accommodate customer, employee and service vehicles;*

There are already significant traffic problems on The Parade, with traffic backing up past Bowen Street from Portrush Road for much of the day. At school pickup and peak hours, traffic is often banked up past Phillips Street. An entry and exit onto The Parade would further exacerbate the traffic problems. The traffic situation on The Parade will inevitably lead to queuing across the footpath creating a dangerous situation for the many pedestrians who walk down The Parade to Norwood.

There is also the probability that reflections and overshadowing from the proposed building will affect visibility at this major intersection having an adverse on impact road safety.

The proposal acknowledges that it provides less parking than required by the Development Plan. In addition it suggests that in future there may well be a move to convert other than the basement parking floors to office space! The proposal would generate significant extra parking requirements, over and above that planned for within the development. At present "On the Run" vehicles are often parked in Kensington and Beulah Park, well away from the Peregrine site. Residents in Bowen Street, Phillips Street and Marchant Streets complain of parking problems from Peregrine vehicles and employees vehicles, taking their street parking and at times parking across driveways. Peregrine employees are also known to park as far away from the Peregrine site as Thornton Street.

The development will also generate significant additional traffic in both High and Bowen Streets.

The traffic studies appear to have been done outside of school pickup times. The number of schools in Kensington and nearby streets in Norwood create significant traffic problems at school pick up times and these will be exacerbated.

280 *Landscaping should form an integral part of centre design, and be used to foster human scale, define spaces, reinforce paths and edges, screen utility areas, and generally enhance the visual amenity of the area. The use of locally indigenous plant species should be incorporated where it is practical to do so.*

The landscaping proposals are minimalistic at best and the landscaping along The Parade would be severely impacted by possible widening of the road as envisaged for introduction of trams. The applicant's track record in maintaining the very basic landscaping in the existing car park calls into question whether or not any proposed landscaping will be properly maintained.

284 *Centres should have minimal adverse impacts on residential areas.*

294 *Development within business, centre and shopping zones should conform to the following design principles:*

(d) Development should not cause nuisance or hazard arising from:

(iv) overlooking;

(v) overshadowing; or

(vi) visual intrusion.

300 *Industrial and commercial development in proximity to residential zones should not impair the amenity of those residential zones and points of entrance and exit should be located so that the number of vehicles using nearby roads in residential zones is kept to a minimum.*

The proposed development will have an adverse impact upon the nearby residential areas. There will be overlooking, overshadowing and visual intrusion for residents in Bowen Street, High Street and Phillips Street. It will be particularly bad for those living in Bowen Street. We are aware that one owner has already sold a Bowen Street property because of concerns about the adverse impact and a family renting in Bowen Street intends moving away if the development goes ahead.

Heritage – (City Wide)

OBJECTIVES

Objective 110: *Development that retains the heritage value of State and Local Heritage Places such that the heritage value of the place, locality and the Council area is reinforced through:*

- (a) the conservation and complementary development of such places; and*
- (b) the complementary development of land and sites adjacent to such places.*

Objective 111: *Development which conserves and reinforces the historic integrity of the Council area and is compatible with the desired character of the appropriate zone and policy area.*

PRINCIPLES OF DEVELOPMENT CONTROL

General

333 *Development (including land division) should not compromise or detrimentally affect the heritage value, character, integrity, setting, siting or function of buildings or sites of architectural, historic or scientific interest, sites of natural beauty or places of heritage value identified in Tables NPSP/5 and 6 as State or Local Heritage Places.*

Development on land adjacent to land containing a heritage place

345 *Development on land adjacent to land containing a State or Local Heritage Place as designated in Tables NPSP/5 and 6 should respect the heritage value, integrity and character of the heritage place and should clearly demonstrate design consideration of the relationships with the heritage place and its setting (without necessarily replicating its historic detailing) and the character of the locality by establishing compatible:*

- (a) scale and bulk;*
- (c) proportion and composition of design elements;*
- (d) form and visual interest (as determined by play of light and shade, treatment of openings and depths of reveals, roofline and pitch and silhouette, colour and texture of materials as well as detailing, landscaping and fencing);*

346 *Development on land adjacent to land containing a heritage place and sited in strategic locations, such as corners or at the termination of vistas, should have a scale and visual interest in the streetscape at least equal to that of the adjoining heritage place, providing the heritage value of the place within its setting is not diminished.*

347 *Development on land adjacent to land containing a State or Local Heritage Place should not be undertaken if it is likely to dominate or detract from the heritage value and integrity of the heritage place by way of design, appearance or standard of construction.*

The proposed development fails to meet the above objectives and principles with regard to its impact on adjacent State and Local Heritage places. At various places in the development report the building is claimed to be of seven storeys, including in the heritage impact assessment. With a ground floor, seven acknowledged levels and the roof level that is effectively two storeys in height, the building is in reality ten storeys high.

The bulk and scale are massive and the proposed building will dwarf the State Heritage listed buildings on the other three corners of the intersection and make them insignificant. On this basis alone the application should be rejected.

BUSINESS ZONE

Introduction

The objectives and principles of development control that follow apply to the Business Zone shown on Maps NPSP/9, 10, 21 and 22. Further principles of development control also apply to policy areas that are relevant to the zone. The combined provisions for the zone and its related policy areas are additional to the City Wide provisions expressed for the whole of the council area.

PRINCIPLES OF DEVELOPMENT CONTROL

Non-complying Development

12 *The following kinds of development are non-complying in the Business Zone:*

The change in the use of land to, or the erection, construction, conversion, alteration of or addition to a building for the purposes of, the following:

Indoor Recreation Centre

Office with gross leasable area greater than 250 square metres, except in the West Norwood Policy Area

Shop or group of shops with a gross leasable area greater than 250 square metres

DESIRED CHARACTER

Kensington Policy Area

Kensington Policy Area occupies a key location at the corner of The Parade and Portrush Road. Development should comprise high quality offices, consulting rooms and retail showrooms.

The corner of The Parade and Portrush Road is a visually prominent site within the city and any new building should be of massing and configuration which visually reinforces the corner, whilst respecting the scale of buildings in the adjacent Historic (Conservation) Zones and maintaining the prominence of the State Heritage listed buildings on the south-western, north-eastern and north-western corners of the intersection of Portrush Road and The Parade.

The Parade and Bowen Street should provide the primary points of access for delivery, service and visitors' vehicles. The creation of new vehicle access points onto either Portrush Road or the portion of The Parade close to the Portrush Road intersection should be avoided.

PRINCIPLES OF DEVELOPMENT CONTROL

4 *Development adjacent to the Kensington 1 and Kensington 2 Policy Areas of the Residential Historic (Conservation) Zone should be compatible in design and scale with the character sought for that Zone and those Policy Areas.*

7 *Development in the Business Zone should not exceed two storeys in height above mean natural ground level, except where identified in the West Norwood Policy Area and the Magill Road West Policy Area, where development incorporating a residential component above ground level non-residential land use/s, should not exceed three (3) storeys above natural ground level.*

Principle 12 lists non-complying developments in the zone. These include, an indoor recreation centre, offices with a leasable area greater than 250 square metres and shops with a leasable area greater than 250 square metres. The proposed development clearly contravenes these conditions of this principle.

Rather than reinforcing the corner with a building that respects the scale of the buildings in the adjacent Historic Conservation Zones and maintaining the prominence of the State Heritage listed buildings, the proposed building will completely dominate the intersection and neighbouring streets, dwarfing the three State Heritage items on the intersection and also detract from the State Heritage listed Benson Fountain on the corner of High Street and Portrush Road.

Contrary to the desired character statement that discourages the creation of new vehicle access points on the two major roads, the proposal has a major entry and exit point on The Parade. This would further exacerbate the existing traffic problems on The Parade as previously indicated.

It is not compatible in either design or scale with the character sought for the Kensington Historic Conservation Zone.

Principle 7 quite specifically states that development in the Kensington Policy Area of the Business Zone should not exceed two storeys in height above ground level. This proposal for a ten storey building is in such direct contravention of this principle that it should be rejected outright.

The Heritage Assessment Report is inconsistent. In some places it indicates there are two Contributory Items in Bowen Street, namely Nos 6 and 8 Bowen Street. In other places it only refers to No 8 Bowen Street as a Contributory Item.

Other Comments:

It is noted that the proposed swimming pool extends beyond the boundary of the site and overhangs The Parade.

Conclusion:

In conclusion we stress that this development application is at serious variance with the Norwood Payneham and St Peters Development Plan 2016 for the following reasons:

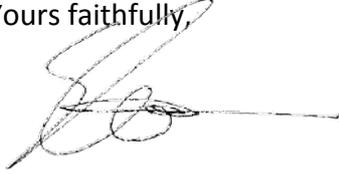
- the proposal is for a building that is the equivalent of ten storeys, whereas it is zoned for two storey development;
- it will dominate this important location and dwarf with three State Heritage items on the other three corners and the State Heritage listed Benson Memorial Fountain;
- it will have a significant and adverse impact on the adjacent Kensington Historic Conservation Zone and Kensington residents living adjacent or near the site;
- it will significantly increase traffic congestion on The Parade between Portrush Road and Phillips Street;
- it will increase parking problems in neighbouring streets in Kensington, Norwood and Beulah Park;
- the proposal includes three non complying uses within the Business Zone; and
- it is a gross overdevelopment of the site.

Accordingly, our Association requests that the Development Assessment Commission reject the development application, as to approve this development would be to throw away the existing planning rules that have been established by Council and Government to provide for orderly and

appropriate development. This development may be appropriate for the Central Business District or Greenhill Road, but is not appropriate on this site, the gateway to the Kensington Historic Zone and one of the key intersections in the Eastern suburbs with its three State Heritage items.

Our Association requests that we be given the opportunity to address the Commission when the matter is considered.

Yours faithfully,



Stewart Caldwell
President (0402 044 118)



Andrew Dyson
Secretary (8331 9654)

cc City of Norwood, Payneham & St Peters,
City of Burnside,
NPSP Mayor & Councillors,
Mr Steven Marshall, Member for Dunstan,
Mr Steven Griffiths, Shadow Minister for Planning,
Local Government Association of South Australia,
Norwood Residents' Association,
St Peters Residents' Association,
Community Alliance SA,
National Trust of South Australia,
Environmental Defenders Office.

NORWOOD RESIDENTS ASSOCIATION INC.

PH 8362 6409
Email mukata @voice.net.au

Minister for Planning
Attention Robert Kleeman, Unit Manager
Strategic development Assessment
Planning & development division
Department of Planning, Transport and Infrastructure
Adelaide, 5000

Subject: Peregrine Mixed Use Development – 270 The Parade Kensington

Dear Sir

The proposal is listed as being in Kensington Gardens which is inaccurate as the location is in Kensington, additionally reference is made elsewhere in the document to The Parade west when the reference is to the west of The Parade.

Our association is not concerned as to why Peregrine seeks this approval but rather the impact of the proposal on the local community, heritage, traffic and parking both now and in the future. We are also concerned that by granting Major Project Status to the proposal, it effectively sidesteps the local community and The NPSP Council Development Plan recently approved by The Planning Minister.

In laying out our concerns we have examined the NPSP Development Plan and its requirements that would apply and the suitability of the project for the site.

Changing to Zoning

The current NPSP DPA has this as two storeys whilst the proposal is effectively 8 plus storeys, with a height of 38 plus metres.

Heritage Issues

This site is adjacent to, and effectively includes part of The Kensington Policy area. It is also part of an intersection with three heritage buildings on the other corners, two being part of NPSP Council and the other Burnside Council area. All three are 19th Century buildings and give The Parade a significant heritage character. Of Clayton (Wesley) a State Heritage building), the Register 10/1/1883 reported of it

“Will form a very pleasant object viewed from every part of Norwood.” This is still true today but the dominance of the proposed Peregrine development will reduce the view.

The other two building on the corners are also part of the character of the intersection. This proposal regardless of the documents comment, makes no attempt to be complementary to the other building either in height, mass or appearance.

Overshadowing

Appendix R shows that during Autumn and Summer overshadowing could be tolerated in High St. But this not the case for Bowen St, in the Summer and Autumn Solstice the street is fully shaded from at least 3pm whilst in Winter shading is from Noon onwards and in Spring from 3pm on wards. Bowen St is not included in the development but it is strongly affected by it.

The Kensington Policy area will be swamped and become ancillary to the development and property owners will experience a loss of amenity with higher traffic flows and extensive over shadowing.

Traffic Issues-

Trams

We have not taken this into account, neither does Peregrine as no decision has been made as to what the details are. But we do note the regular bus service is not referred to, and this during weekdays is at least one or more buses each quarter hour

School traffic

The other issue ignored in the proposal is the high level of traffic caused by the schools in the area, we understand 3000 thousand children attend school daily quite close to this site and numbers are growing. As is common many of the children are taken by car to school and the 5th form student often drive to school. What is also omitted are traffic flow figures relating to the period 3-4pm, the end of the school day. NPS Council has done considerable work on a Schools DPA related to the impact of these numbers and possible action to reduce difficulties caused by this situation.

Tables

Having examined the tables in section 5 dealing with projected traffic generation, we find these doubtful. We question the ups and downs of The Parade traffic flow as the pressure on Councils to increase urban infill means more not less cars. The absence of figures for Portrush Rd in the projections seems strange as this is a very major Road in the Eastern Suburbs with its links to Murray Bridge and it high carriage of trucks. Of other concern is the increase of staff numbers on the site and therefore increased traffic movements as a result.

From our observations the queuing on The Parade going west in the mornings is longer than stated.

Access and egress is understated as entry into the site from The Parade would be a problem at busy times and exiting from Bowen St could also be slow during busy times.

Parking

The proposal to allow a discounted parking requirement will place more stress onto Kensington Residents, as is the case at the moment. Noted in the proposal is the possibility of later on reducing car parks and turning the space into offices. To do this would just increase the parking problem.

Summing Up

The Principles 278, 282,292 and 293 of The NPSP Development Plan which deal with traffic, on site parking, access, and safety seem to be ignored. For council, residents, ratepayers, vehicular and pedestrian user, these omissions create a safety problem as well as an inconvenience.

The residential amenity of the residents of Bowen St is not considered. Heritage is pretended to be taken into account with City Wide objectives of The NPSP Council Development Plan being are ignored, these deal with the heritage issues and the effect of new developments close to, or adjacent to Heritage areas and buildings.

The traffic and access and parking problems are glossed over.

Final comment

Effectively the development site is not suitable for all the reasons stated, as it ignores all the factors listed as well as its mass and dominance and its location on a busy road and intersection.

Our Association is strongly opposed to this development for the reasons set out.

Jim Dunk
President
21/10/16

Submission RE - proposed developer
the Peregrine building at 270 the
arcade, Kensington.

1. The monstrous height of the
building will serve to dwarf/diminish
the historic buildings on the other th
corners of the intersection. In particu
the spine of the Gostrell/Wesley Church
& highly significant aspect of that
building for its founders, will
become merely a shadowy reminder
Kewwood's past. The present Peregrine
building was an early step in under
mining the historical value of the
precinct and, obviously, has set a
precedent for future deterioration.

. Property owners in Bowen Street will
have their quality of life — and the
value of their homes — destroyed. Live
in the shadow of a 38 meter, commerc
building with its concomitant traf
hazards and wind-tunnel effect ne
never suggested by council regulatio

's projected Nuova apartments on Trade Mill, it appears, have been 'selling their hills' views on false pretences. Will WiFi reception from the Water Tower be blocked to Kensington, Culah Park residents?

I have lived in Richmond Street, Kensington for the last 8 years. I have regularly used, and been very aware of the traffic problems of turning from Portrush Road into High Street and from Owen Street into the Parade — problems which will be markedly exacerbated by the extra volume of traffic generated by the proposed new building.

The right turning lane into High Street from Portrush Road is very narrow and the major right turn into the Parade from the High Street turn regularly blocks access to the right turn into the Parade — causing frustration and incipient road rage. This occurs when there are only a few cars on Portrush Road — in peak times.

To exit from Bowen Street at present here is only one route. Cars must turn left into the Parade or Right, cross the traffic flow, into the Parade driving towards the hills. Because his street is the closest to the traffic lights at the intersection of Portrush Road and the Parade, during peak hours, drivers are loath to let others enter the stream of traffic (this manoeuvre is possible from streets further east when cars are waiting the lights to change)

Even the turn Right from the Parade into Portrush Road and then directly Left into High Street is a potential problem. It is necessary to move immediately into the Left lane after the turn or be in danger of cutting across from the Right to the Left lane (ie disobeying the road rule re remaining in the turning lane)

Progress is inevitable, but is an excessively tall building on the edge

legitimately be called progress? A
lower building, empathetic to a
position might add to the ambience
of the intersection and not loom
darkly as the precursor of a bleak
future.

B. N. Steed
3 Richmond Street,
Kensington. 5068

8333 1902

Unit 9, 71 Queen St
Norwood SA 5067
23rd October 2016

Hon. John Rau MP
Minister for Planning
c/- Mr Robert Kleeman
Unit Manager, Strategic Development Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide SA 5000

Dear Minister

Re: Peregrine Mixed Use Development, 270 The Parade, Kensington

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Our concerns relate to the size and location of the proposal. The imposing size of the proposed building will have a large visual and physical impact at this significant road intersection and will adversely affect at least three State Heritage places at this location, especially the Clayton Wesley Uniting Church Complex.

The view eastwards along The Parade is quite unique in Adelaide as it features the towers or spires of three buildings – Norwood Town Hall, Norwood Wesley Church and Clayton Congregational Church (to give them their original names) - viewed against the sky and the Hills Face Zone of the Adelaide Hills. This view is illustrated in the Heritage Assessment Report. As the report states, this is 'a historic visual character' of the area. The current views of the church from both the west and north will be destroyed by the size (and height) of the proposed development.

The report correctly states that '*of the State Heritage places, Clayton Wesley Church is most likely to be materially impacted by the proposed development, due to its proximity to the site, and current visual dominance.*' Clayton Wesley is one of Adelaide's finest church buildings, a highly significant example of Gothic Revival architecture and is one of less than half a dozen churches in Adelaide with a tall spire. We disagree with the Heritage Assessment Report's summary that the proposed building will be '*a building that reinforces the intersection, while nonetheless sitting compatibly with the adjacent State Heritage place*'. The architectural impact of the church will be seriously compromised by the proposed development,

It is of concern that the proposed building will exceed the maximum height envisaged for the Kensington area. If this development is approved at seven floors it will open the way for other such developments in this largely residential suburb.

In summary, we consider that the proposed development is inappropriate for this site, a significant intersection which has four State Heritage places and various Local Heritage places nearby and is the focal point of the impressive vista eastward along The Parade. We consider that the full impact on the architectural stance of Clayton Wesley Uniting Church property has not been properly assessed.

Yours faithfully,

[Handwritten signatures]
S. Kellie
B. Stan
A. Hadziak
E. H. Kumega
Merya Hillywhite

Eileen Sinclair
285 Portrush Road
NORWOOD SA 5067

Hon. John Rau MP
Minister for Planning
c/- Mr Robert Kleeman
Unit Manager, Strategic Development Assessment
Department of Planning, Transport and Infrastructure
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E. Sinclair

2/70 Barnes Ave
Magill 5072
Adelaide
8th Aust.

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Minister for Planning
c/- Mr Robert Kleeman
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Susanne Fitzgner
Susanne Fitzgner

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Minister for Planning
c/- Mr Robert Kleeman
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Adelaide SA 5000

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M. J. Leung
H. Australe
Magill. 5042

Hon. John Rau MP
Minister for Planning
c/- Mr Robert Kleeman
Unit Manager, Strategic Development Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide SA 5000

* Unit 7,
6 Pungla Court,
Kensington, SA 5072

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* *Doris Smith*
Barbara Hume
Ken Hume
David Greig

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 c/- Mr Robert Kleeman
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Mr H. Kirk

UB. 24/26 Queen St.

Norwood 5067

6/122 Reid Ave
MAGILL 5072

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Minister for Planning
c/- Mr Robert Kleeman
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 . 23 Jun 2016

11 PERCIVAL ST 17h

NORWOOD SA 5067

23rd October 2016

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Minister for Planning
c/- Mr Robert Kleeman
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Department of Planning, Transport and Infrastructure
GPO Box 1815
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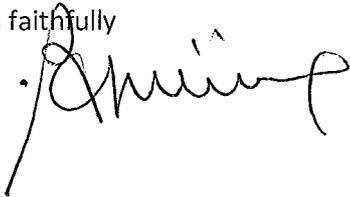
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John Whittam
12 Bolingbroke Grove
TOORAK GARDENS 5065

Hon. John Rau MP
Minister for Planning
c/- Mr Robert Kleeman
Unit Manager, Strategic Development Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
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Binclair 285 Portrush Road Norwood SA 5067

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Yours faithfully

Allan Shephard

8/43 Fisher St.
MAGILL SA 5072

Zuidland, Sara (DPTI)

From: lesleybchm@gmail.com
Sent: Monday, 24 October 2016 12:43 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Peregrine mixed use development

I wish to to object to this proposed development at 270 The Parade, Kensington on two grounds - (1) The height and scale of the proposed development at 8 stories is inappropriate for this corner with 3 low scale heritage buildings on the other 3 corners.
(2) Any traffic turning into High St from Portrush Rd may find it difficult to manoeuvre past cars emerging from the Peregrine car park.

Regards,
Lesley Beacham
17/69 MaesburySt, Kensington 5068

Sent from my iPad

Minister for Planning
 Attention: Robert Kleeman, Unit Manager Strategic Development Assessment
 Planning & Development, Development Division
 Department of Planning, Transport and Infrastructure (DPTI)
 GPO Box 1815 ADELAIDE SA 5000

RE: PEREGRINE DEVELOPMENT AT 270 THE PARADE KENSINGTON

Dear Mr Kleeman

My wife and I have lived at 6 Philips St, Kensington, for 5 years and we love the area. We have a young family and are looking to stay long term. We are keen to see development in the area, and in principle support the proposed development. However, we have the following concerns, and wish to see them addressed:

1. On a site of limited area, we question the necessity of a 50m lap pool, and question whether the pool can size can be decreased, providing more efficient use of building space. This could translate into a global decrease in building size (particularly on the upper levels where building bulk has more of a visual impact).
2. Again, limited land size leads us to question the size of the void/atrium, which is essentially unused space. We understand the atrium contributes to natural light and cooling othe building, but ask whether it may be reduced in size, providing more efficient use of building space?
3. Whilst visually striking, the cantilevered swimming pool design onto the Parade (western elevation) imposes visually on The Parade and Clayton Uniting Church.
4. Fritted glass façade rakes out over Portrush Rd near High St corner (High St elevation), visually imposing onto the road. Suggest raking angles away from intersection or increasing setback of facade.
5. Fritted glass facades cantilever towards north western property corner – again, imposing into the intersection. Suggest raking angles away from intersection or increasing setback of upper levels from intersection.
6. Has the carparking analysis undertaken by GHD considered Peregrine business growth and subsequent increased employee numbers?
7. There is significant overshadowing on neighbouring properties on both Bowen St and Phillips St (see Appendix R, particularly Winter Solstice 3pm). What will be done to minimise this? Certainly a drop in height and lateral bulk would improve this.
8. Overlooking analysis seems brief and inconclusive (see Appendix S). Section A suggests overlooking into Bowen St and Phillips St could be an issue. Particularly for residents on western side of Phillips St whose backyards will be on show to those in the new development.
9. 4.5m tram allowance does not seem to allow sufficient space for future pedestrian footpath or verge area on southern side of The Parade, should the 4.5m road widening become a reality. Section 4.4.4 of the report states that an additional shared track of width 3.7m was considered as a reasonable possibility. With the current road configuration, the swimming pool and the upper levels of the building facing The Parade overhang and impose over the road. If the road was widened further, the swimming pool and upper levels of the building would almost hang over the actual road. The street trees would also need to go. If there is to be a genuine attempt at accommodating the future tram, a setback of more than 4.5m should be implemented.

10. We believe that some assumptions in Sonus' (acoustic consultant) report are not valid. It is extremely unlikely that loading activity will be limited to between 7am and 10pm. It is equally unlikely that engines and refrigeration units will be turned off whilst deliveries are happening. Whilst we are far away not to be directly impacted by these noise issues, we have lived across the road from Peregrine's service station on Phillips St for 5 years and can confirm that deliveries occur well before 7am and that engines and refrigeration units remain on the entire time. Considering the new development includes a restaurant, and potential retail / café accommodation, I would not expect behaviours to be any different. The acoustic performance of the development should not be dependent on these assumptions.
11. We disagree with DASH Architect's opinion that the development has an acceptable level of impact on the surrounding State Heritage places. The architect states that "the context and setting of bold, strong, high quality architecture (in this case the State Heritage places) is often improved though the provision of surrounding development of similarly bold and high quality nature, rather than the employment of a 'submissive' or 'apologetic' design response." In this case, the grandeur of the Clayton Wesley Church is primarily due to the height and design of its tower. Similarly the building on the north western corner of the intersection gains its beauty and prominence from its tower. The height of the proposed development detracts significantly from these existing towers, and draws the eye away from what are currently the focuses of the intersection. We disagree that the developer should be seeking to develop an iconic building in this location. The iconic buildings already exist at this intersection, and have existed for longer than either you, me or the developer have. The new development should not even seek to *complement* the existing heritage buildings. We believe the new development should take a back seat to the grand architecture at this intersection, and not seek to become the focus. This cannot be achieved with the scale of this development. Whilst we are in favour of the various developments in the area (this proposal, the Bath Apartments, the Nuova Apartments), we feel strongly that the existing grand architecture at the intersection should not be stripped of its significance by surrounding architecture competing for attention.

The points above summarise our concerns with this proposed development. We feel that the development has significant architectural merit, but if it's setbacks from the main roads were increased and its height decreased slightly, the visual impact would be significantly decreased and the architectural balance at the intersection maintained. We look forward to a considered response from the DAC and/or the Developer, and hope that our (and other stakeholders') opinions and concerns are addressed accordingly.

Please feel free to contact us directly if more information is required.

Kind regards,

Victor and Courtney Pisaniello
6 Phillips St, Kensington SA 5068
0409 677 092

Zuidland, Sara (DPTI)

From: judycarman@ozemail.com.au
Sent: Monday, 24 October 2016 4:42 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Peregrine Mixed Use Development - 270 The Parade Kensington

Dear Robert Kleeman

I am writing to you about the Peregrine mixed use development proposed for 270 The Parade, Kensington.

I wish to support the Kensington Residents Association submission to you regarding the proposed development. In addition, I wish to add the following comments.

The development is in an Historic Conservation Zone and is starkly different to anything permitted in the Zone and hence dramatically detracts from the Zone. The development is also sited on one corner of a major intersection where the other three corners contain State Heritage items, being a rare confluence of Heritage buildings in the State. The proposed development makes no attempt to blend in to those items, but rather is designed to be starkly different to them, dramatically detracting from the Heritage value of the State.

The proposed building is absurdly high, wide and deep for the area. It constitutes a dramatic over-development of the site and it will be the dominant building for kilometres around. At an effective 10 storeys high in an area where other buildings are one to two storeys high, it will also create overlooking problems for hundreds of residents, including those residing several streets away, such as myself. As a result of having previously worked in an eight-storey building, I am aware that people can see from that building into people’s windows and backyard for several kilometres. The building will therefore affect the privacy of hundreds of people who live and work nearby.

It will also greatly worsen the already considerable parking congestion in the area from the existing Peregrine site. The existing site is in an area of shopping and largely medium-density housing where many residents park on the street and travel to the CBD for work via public transport, so that their cars remain on the street all day. This combines with the lack of on-site parking for the existing Peregrine site, so that I have repeatedly seen Peregrine cars (with clear OTG markings) parked on the street up to a kilometre away from the existing building.

The development will also greatly worsen the already awful traffic congestion around the area. The development will be sited on an arterial road (The Parade) on a section of that road where there is a squeeze point – where two lanes narrow to one lane before again widening to two lanes. This occurs in both directions of traffic flow on that section of The Parade. During peak hour traffic, it currently takes approx. 15 minutes (and several changes of traffic lights) to travel 200m in a westerly direction along that section of road. I have frequently seen traffic backed-up to Bridge St and sometimes beyond to Shipsters Road, almost a kilometre away. Furthermore, “peak hour” starts at approx. 3pm during school term for the area. There are seven (7) schools with a combined student body of thousands of children within an approx. 1.5 km radius of the development, and many of their parents drive through that intersection to drop-off and pick-up their children from school. Many drive through the squeeze point on The Parade when they do so. If the development proceeds, it could reasonably be expected to “blow out” the travel time along that section of road from 15 mins to over 20 minutes, leading to considerable frustration in the thousands of people who use that road. This is likely to worsen the already existing knock-on effect in surrounding streets. On numerous occasions, I have seen people travelling west on that section of The Parade get frustrated at the existing delays and do U-turns into on-coming traffic or make left-hand turns down local residential side streets to travel north to get to Magill Road in order to avoid the current delays on The Parade. I have seen four or five cars in the queue do that at the same time. Yet the development intends to add hundreds more cars to the squeeze point in peak hours.

I therefore echo and add to the concerns of the Kensington Residents Association that the traffic studies appear to have been done outside of school pick-up times. The traffic studies should therefore be repeated during school drop-off and pick-up times during school term. Furthermore, the traffic study should be sufficiently thorough that it picks-up people travelling west on The Parade who wanted to go through the intersection of The Parade with Portrush Road but did not, due to congestion near the intersection, and instead turned left onto Union Street, Amery Lane, Dimboola Street, Howard Street, Duke Street or Salop Street to travel on Magill Road.

In conclusion, I consider that the proposed development is absurd for the site.

Yours sincerely

Dr Judy Carman

*Dr Judy Carman BSc (Hons) PhD MPH MPHAA
Epidemiologist and Biochemist
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Institute of Health and Environmental Research
PO Box 155
Kensington Park, South Australia, 5068
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Email: judycarman@ozemail.com.au*

Zuidland, Sara (DPTI)

From: Allison Stokes <allioverseas@hotmail.com>
Sent: Monday, 24 October 2016 4:39 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: PEREGRINE MIXED USE DEVELOPMENT – 270 The Parade Kensington

Minister for Planning
Attention: Robert Kleeman, Unit Manager Strategic Development Assessment
Planning & Development, Development Division
Department of Planning, Transport and Infrastructure (DPTI)
GPO Box 1815 ADELAIDE SA 5000

PEREGRINE MIXED USE DEVELOPMENT – 270 The Parade Kensington

Dear Sir

I wish to convey my **strongest possible objection** to the development application for a multi-storey mixed use development at 270 The Parade, on the corner of Portrush Road and The Parade.

I live in the small, historic and mainly residential suburb of Kensington. Most of our suburb is zoned Residential Historic (Conservation). The proposed development sits on a small pocket of land zoned Business. Indeed our little suburb's history has long been a mix of business and residential. But it was always small business and the residential and business parts co-existed in a complementary way. This development is big business and it does not belong in any way in any part of Kensington. Rather, it should be built in the Adelaide CBD or perhaps somewhere along Greenhill Road or Fullarton Road.

To summarise, I object to the proposed development for the following reasons:

SIZE

- The current Norwood Payneham and St Peters Development Plan states that developments should be no higher than two storeys. This development is of at least eight levels and to include the additional glass at roof level would increase the height to possibly 10 storeys. This will have the following impacts:
 - Devaluing the historic feel of this important intersection and gateway to the eastern suburbs and destroying the view to the hills. While parked at the traffic lights the other day and trying to imagine the proposed development I concluded that I would no longer be able to see the beautiful vista to the hills, or be able to focus on anything except the proposed building.

- Diminishing the visual significance of the Clayton church and overpowering the presence of the other three historic buildings on the other three corners.
 - Nowhere have I seen a proper image (drawing, photo) of the proposed development in relation to the church or the buildings on the other three corners. The church is always somehow left out, or only the merest edge of the picture. Where is a full 'before and after' image with the proposed building superimposed over a photo of the current scene? The context is so important here, but nowhere have I seen this fully laid out.
- Overlooking and overshadowing nearby housing.
- Being so tall and massive, it will be an eyesore on the horizon that most people in Kensington and many people in nearby Norwood will see, many of them seeing it from the front gate of their own property.
- Destroying the historic nature of the suburb of Kensington.

TRAFFIC

- The intersection of Portrush Road and The Parade is already a major bottleneck, particularly in peak morning and afternoon traffic. School pickup times from about 3-4pm are also bad. Catching the bus down the Parade into the city in the mornings, we are often banked up all the way to Thornton Street, sometimes further. The additional traffic will magnify this problem many times over.
- This additional traffic will be particularly bad for residents living nearby. The proposal has provision for many car spaces but with eight storeys including retail, café, restaurant, gym and accommodation, I doubt very much whether it will meet the needs of this massive building, and so car parking will spill over into the adjacent local streets.
- Café and restaurant trade will probably mean early morning traffic delivering fresh food and further impact residents with noise.

COMPLIANCE

- The proposal is non-compliant with many aspects of the Norwood Payneham and St Peters Development Plan 2016. This is a recent document. If this proposed development is approved, it will eliminate all of my faith in public policy and planning. I will not be the only person thinking this way. While the proposed development may create jobs this is not a reason for the development to be approved. Jobs created in the short term when constructing the building are just that; short term jobs. Additional new, ongoing jobs may well be at the expense of people in retail and cafe/restaurant trade nearby.

Once built this massive building will be there forever, negatively impacting residents and passing traffic, and detracting from the historic status of Kensington.

I urge the State government to carefully consider the short and long term benefits and drawbacks of this development proposal **and reject it unless it is modified to be compliant in all aspects with the existing NPSP Development Plan (2016)** and in particular no higher than two storeys.

Yours faithfully

Allison Stokes

Resident of Kensington.

To The Minister for Planning. c/o Robert Kleeman,
Unit Manager, Strategic Development Assessment,
Department of Planning and infrastructure

From Elaine Dyson
42, Regent Street,
Kensington, 5068.

I wish to object to the proposal for 270, The Parade, Kensington for the following reasons:

The scale of the proposed building does not respect either the present development policy of the area or the historic buildings on the other three corners of the intersection. Clayton Church would be dwarfed by the new building and would no longer stand out as an historic feature giving character to this area. This Historic Conservation Zone has attracted many people so that house and land values in this area have gone up in relation to other areas. If the company wishes to build a multi-storey office, then it should purchase land in an area where that sort of building is permitted.

Parking in the area is already a problem as traffic caused by the development does not fit into the car park and so vehicles are parked on Regent Street, Thornton Street and The Parade. This last causes problem with traffic approaching the intersection and parking on the smaller streets unfairly blocks spaces for visitors to households in the area as well as making them more difficult for drivers to navigate. It is noted that the proposal does not fulfill the development policy recommendations for parking spaces and also that some of the parking spaces are being specifically designed so that they can be converted to office space in the future. This would create a further imbalance with more people needing parking spaces, but less car parks.

There are various comments on the greening of the area by judicious plantings. Over the last ten years we have seen how little this company cares about such things as even they comment that the site "contains no vegetation of note." Whose fault is that? And how can we trust this same company to follow through with plans in this proposal?

It is already a problem keeping commercial properties in the Parade operating and viable so more of these are not needed. There are already plenty of cafés along The Parade. The shops and cafés may be useful for those working in or attending training on site, but this would cause further lack of business in the main commercial area of The Parade.

One wonders about the accuracy of information in this proposal as the address of the site in question is incorrect in several places.

Finally, it is most unethical to take all planning rights from the local authorities when there is a large development. It is exactly in these cases that more care needs to be taken in deciding what should be built, not some person totally unconnected with the area who is just looking at short term money generating proposals. The people who live in an area should be consulted and their arguments listened to as they are the ones who have to live with whatever is built.

Yours faithfully,

Elaine Dyson.

Statement of Representation

Proposed Development: Peregrine Mixed Use Development

Location of Proposed Development: 270 The Parade, Kensington

Name and Address of Person making representation

Andrew Chelmers 5/24 Bridge St Kensington

My interests are those of an occupier of land in the vicinity.

I am opposed to the proposed development in its current form.

Specific aspects of the Application to which I make representation are:

Excessive height (35.3m) and bulk of the proposed development.

It dominates the other 3 (State Heritage Listed) buildings surrounding the intersection of The Parade and Portrush Rd.

Not enough onsite car parks for all the multi-uses.

The above ground level carparking lessens the proposed buildings contribution to the public realm.

Desired action which would overcome my concerns

Execution of the proposed development to what the Government Architect Kirsteen Mackay

calls an exemplary quality appropriate to the location. This is in her letter to

Tony Materne of MPH Architects on 24 May after the second Design Review session.

Again from the letter of 24 May exemplary quality would presumably include following a number of the Government Architects recommendations

"I recommend that the proposed built form be informed by further contextual analysis to reduce the height and massing of the building"

"I recommend further consideration of the upper level cantilevered geometry and its visual impact on the sites landmark corner location."

"I strongly encourage relocation of a greater proportion of the above-ground car parking to the basement levels"

"I recommend further design development of the material palette" ... (Bowen and High St)

"I recommend the design review team undertake further design development of the hierarchy of outdoor spaces with a view to reducing the scale and apparent bulk of the building."

"I recommend further design development and analysis of the retail and cafe functions to ensure the design intent for visual permeability is realised and the proposal offers a generous and positive contribution to the public realm."

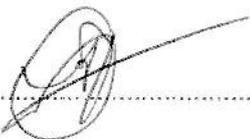
Conclusion

I am not sure any of these recommendations from the Government Architect have been followed.

Plans in appendix G are dated 17 August but no earlier plans to compare with.

I do not have the technical knowledge to assess the plans in terms of following the Government Architect's recommendations (ie exemplary quality appropriate to the location) in her letter of 24 May.

There are no further letters in the Final Development Report from the Government Architect after 24 May to MPH or evidence that any further Design Review sessions have occurred.

Signed..........Date..... 24 OCTOBER 2016

Andrew Chelmers

andtc@senet.com.au

PO Box 3170 Norwood SA 5067

Zuidland, Sara (DPTI)

From: Margaret Cleary <Margaret.Cleary@sosj.org.au>
Sent: Wednesday, 19 October 2016 12:09 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: FW: Letter to Robert Kleeman re Peregrine
Attachments: Re Peregrine. Mr. Robert Kleeman - dept of Planning.pdf

Dear Mr Kleeman

Thank you for the opportunity to make a response with regard to the Peregrine Mixed Use Development. Most projects present both opportunity and challenge and while we commend the opportunities this would provide in employment and other aligned benefits, we present the attached summary of our concerns which we believe deserve a critical analysis for the well-being and safety of all in the immediate area particularly during the time of construction.

We thank you for taking the time to be investigate the implications and ask that you or your delegate respond to our detailed reply as soon as possible.

Should you have any questions for clarification, please contact in the first instance, my Councillor, Sr. Mary Cresp email – mary.cresp@sosj.org.au

With appreciation

Yours sincerely

M. Cleary

Margaret Cleary rsj
CentreWest Regional Leader
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Minister for Planning C/-
Robert Kleeman
Unit Manager, Strategic Development Assessment
Department of Planning, Transport and Infrastructure
majordevadmin@sa.gov.au

Dear Mr Kleeman

Thank you for the invitation to respond to proposals for the Peregrine Mixed Use Development at 270 The Parade, Kensington, SA.

We, the Sisters of St Joseph, have significant concerns about the proposal, summarised as follows:

1. **Parking during construction:** As you know, Mary MacKillop College, the Mary MacKillop Centre, the Regional Offices of the Sisters of St Joseph and Tappeiner Court Nursing Home all adjoin High Street, where parking availability is already stressed due in no small account to the large number of OTR vans and cars taking up the spaces previously accessible to staff, students and visitors to these facilities. We hate to think of what it will be like when builders and other labourers begin work in this confined space.
2. **Eventual traffic flow on High Street:** High Street is narrow, and the entrance to it from Portrush Road, especially for traffic coming from the south, is complicated. As it is, our staff find it dangerous to venture on to High Street from our property because of the visual obstructions caused by parked vehicles and oncoming traffic. Your Development Proposal mentions traffic effects on to The Parade but does not give statistics or detailed effect for High Street. It refers to Appendix L, but the package only provides appendices up to Appendix G, so detailed findings on anticipated traffic in High Street are not available to us.
3. **Dangerous conditions:** The entrance to the proposed car park in the building is quite close to Portrush Road on High Street. It takes little imagination to see in that short distance the propensity for bottlenecks and dangerous conditions as people try to do right hand turns into High Street or when cars exit from the car park, especially at times when Portrush Road traffic is heavy.
4. **Shadow:** Page 27 of the Development Report acknowledges shadow cast over portion of Bowen St and High St at midday at the time of the solstices. What about during the other seasons? With seven bulky storeys looming over us here, shadow effect and the sensation of being hemmed in will be real.
5. **Overlooking:** The views to each direction except the south (ours) are described on page 28 of the Report. Our Sisters deserve their privacy too.
6. **Incorrect designation Appendix D:** We note that you have labelled the Residential Historic convent building as “Nursing Home” on this diagram. This

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is NOT the Tappeiner Court Nursing Home. The Nursing Home is the building that is outlined in pale blue within Policy Area 12.9 immediately adjoining High Street and Portrush Rod. The impact on this building regarding shadow and traffic will be substantial.

7. **Contextual Incongruity**: On page 24 of the Report you claim that 'while the proposal is of a notable scale, its design has been developed in response to the context of its surrounds, to reduce its visual bulk and scale and limit any material impacts on the context of surrounding state and local heritage places'. We emphatically disagree with this opinion. Given the character of this area, this tall, bulky building on such a small area of land is quite unsuitable and should, instead, be located in an area closer to the CBD where other such buildings exist, e.g. Greenhill Road.
8. **Development Incompatibility**: We can see that the interface issues connected with the range of activities proposed for this building will have severe and adverse impact on retreat programs and other religious and spiritual events that are a feature of the Chapel, Museum and other facilities offered at the Mary MacKillop Centre. Unless specific parking and traffic management provisions are put in place it will become just too difficult for members of the public to visit the Centre.

We would appreciate you giving serious consideration to the points we have raised and look forward to your detailed reply.

Yours sincerely

Sister Margaret Cleary rsj
Regional Leader, Sisters of St Joseph

Daniel Thornalley
18 Blight Street
RIDLEYTON SA 5008

Ref: ASDAN - Nuova

24 October 2016

Minister for Planning
Department of Planning Transport and Infrastructure
GPO Box 1815,
ADELAIDE SA 5001

Attention: Robert Kleeman,
Unit Manager Strategic Development Assessment
Planning and Development, Development Division

By email: majordevadmin@sa.gov.au

Dear Mr Kleeman,

Peregrine Mixed Use Development – 270 The Parade, Kensington

I write on my own behalf and on behalf of Ms Abigail Steed, the co-purchaser of Strata Lot 507 in the Nuova Apartments development at 245 the Parade, Norwood (*our Property*).

Our Property is located directly to the west of the proposed development site at 270 The Parade, Kensington (the *Development*).

We will be significantly impacted if the Development is approved and proceeds.

We object both to the Development proposal and to the decision of the Development Assessment Commission (*DAC*) to assess this Development under s46B of the Development Act 1993 (the *Act*).

This letter sets out our objections to the DAC's decision and to the Development generally. Our specific objections are set out in the **attached** Submission.

We obtained a USB copy of the Development Report (*DR*) prepared on behalf of the Peregrine Corporation (the *Proponent*) on Monday 17 October. When access was sought to a copy of the DR at the Norwood Council chambers, we were advised that they had “run out of hard copies” and could only provide me with an electronic copy on USB.

The DR is in excess of 350 pages in length; and much of its content is of a technical nature.

DAC Determination of DR Process

A consultation period of 15 business days has been allowed for submissions. This truncated consultation period is due to the DAC decision to assess the Development at the lowest level of scrutiny under s46D of the Act.

This period complies with the *minimum* statutory requirements of s46D(5)(b) of the Act.

We submit however that a minimum assessment level of a PER under s46C of the Act should be required for the Development given,:

1. the extent to which the Development deviates from the development plan (**DP**) for the Norwood, Kensington and St Peters Council (the **Council**) and, presumably also the DP for the Burnside Council area;
2. the extent of the materials contained in the DR and their technical nature;
3. the size and scale of the Development; and
4. its location immediately adjacent to
 - (a) long established residential areas;
 - (b) a Residential Historic (Conservation) zoned area;
 - (c) State Heritage listed buildings;
 - (d) The recently approved development of the Nuova Apartments; and
5. the permanent and irreversible effects which the Development will have on its surrounds if approved and constructed.

In the alternative, and at the least, we submit that discretion should have been exercised by the Minister to extend the minimum notice requirements under s46D(5)(b) to a reasonable period similar to that provided for a PER or EIS process under the Act.

In light of the above matters (and all other relevant matters which the DAC is required under the Development Regulations to take into consideration), we query the basis on which the DAC could reasonably have determined the level of assessment to be a DR Process.

A specific response is requested advising what materials and further justifications were submitted by the Proponent which led to this determination and information regarding the deliberations of the DAC in assessing the request for Major Project Status under the Act.

Major Development Status

Section 46 of the Act is specifically designed to limit and/or cut off avenues of complaint, objection or appeal by individuals in respect of developments which are assessed as having a broader community and/or economic value to the State.

The power of this section to place “the good of the many, above the good of the few” comes with a heavy onus on both the Proponent and the State to weigh up competing interests and establish, with reasonable certainty, that the benefits will indeed outweigh the costs.

There is little in the DR in the way of objective assessment of the broader economic or social benefits of the Development, as against the cost in both monetary terms and more ephemeral, (but equally valuable), concepts of loss of character, history and amenity to the Norwood and Kensington area and surrounding suburbs.

To what extent has DAC or the Minister made investigations into the public standing and corporate background of the Proponents?

Other than the obvious and direct economic benefit of a construction project of this size including, the temporary employment opportunities during the construction phase, to what extent has DAC or the Minister assessed the economic or social benefits **at a State level** of the proposed Development?

To what extent has the Proponent substantiated that there would be **detriment to the State** if the Development is not approved? There is little substantiation of this nature in the DR itself.

Objection to Development

The length and complexity of the DR and the limited time period within which to consider its content have hampered our ability to assess the likely impacts and to prepare this submission.

We foreshadow that we may **seek additional time** to provide further information or submissions.

We believe that other purchasers of apartments within the Nuova Apartments will be affected in similar ways and may wish to lodge objections and/or submissions but, due to the truncated consultation period, may now be precluded from doing so in any effective manner.

The principal areas of concern, which we address in the attached Submission, are:

1. Loss of amenity through:
 - (a) overshadowing;
 - (b) visual impact;
 - (c) increased noise and light disturbance;
 - (d) loss of privacy through overlooking and the proposed security measures;
2. Effects on the residential character of Kensington, Norwood and Beulah Park more generally;
3. Traffic increases and traffic management issues; and
4. Devaluation of our Property.

We address each of these matters in the attached Submission document.

Except as highlighted below, we have no objection to information contained in the Submission being made public but only for the specific purpose of the Response Document which is to be prepared by the Proponent.

- ❖ **We do not give consent for comments in the Submission which are highlighted in the manner of this paragraph to be made public.**

We seek an undertaking from the Proponent that we will be provided a full copy of the Response Document, concurrently with its publication.

Yours sincerely,

Daniel Thornalley

Email: dthorn@live.com.au

1 Loss of amenity

1.1 Background

- (a) Background
 - o We entered into a contract to purchase our Property “off-plan” on 12 January 2016.
 - o The primary attraction of the Property to us was its location within the Norwood Parade precinct adjacent to attractive historical buildings in Norwood, Kensington and Beulah Park together with the uninhibited eastern views of the Adelaide Hills.
 - o The property is east facing and on top floor of the development
 - o While we have purchased the property partly for investment purposes, it has been my intention to reside in and look after the property once constructed.

- (b) Investment

- (c) Consideration of Future Development
 - o At the time of entering into the contract it was our understanding that the area immediately to the east was zoned Residential Historic (Conservation) and we believe that is still the case.
 - o We were aware that 270 The Parade was a commercial building and that there was some possibility that the site could be re-developed in the future.
 - o We specifically discussed this possibility with the Nuova representative in light of the recent changes to Council policy which had allowed the Nuova development to exceed previous height limitations for the area.
 - o We were advised that the lifting of height restrictions related to the central Parade business precinct and that, the Peregrine site, being outside that area and immediately abutting a residential area could only be developed up to 3 storeys under existing regulations.
 - o Our decision to purchase the property relied entirely on these protective restrictions in existing planning regulation and the belief that any development on the Peregrine site could cause little or no impact to the amenity of our Property.

1.2 Overshadowing – Loss of direct sunlight

- (a) I note that the overshadowing projections in the DR have been prepared only from 9am in the morning until 3pm in each seasonal period. No consideration is given to loss of direct sunshine and light before or after these times.

- (b) We are concerned that:
 - o the overshadowing projections show shadowing of our Property in Autumn and Spring will commence well before 9am and continue through mid-morning. As the

property is east facing, it relies on morning exposure to sunshine for its amenity. This will be almost entirely lost for up to 6 months of the year due to overshadowing effects of the proposed Development.

- o **Contrary to the requirements of the Guidelines** at page 6 that “*Shadow diagrams demonstrating the extent of overshadowing (pre and post development) on adjoining properties...*” be provided, information regarding **pre-development** shadowing is not included in the DR.
- o In the absence of this required information we can only estimate that extent of the overshadowing effects on our Property

1.3 Overshadowing – Loss of indirect light

The effects of overshadowing are, of course broader than the loss of *direct* sunlight.

Personal effects of Overshadowing

In summary, we perceive that the overshadowing effects of the Development will have the following adverse impacts on us as owners of the Property and directly on me as the proposed occupier:

1.4 Visual Amenity

- (a) The height and bulk of the Development are both unprecedented.
- (b) Having read the DR, I find statements to my business partner, Abigail Steed who attended a resident’s briefing given by the Proponent **that the Development will be only 7 storeys tall to be misleading and entirely disingenuous.**
 - o Firstly, there are 7 storeys above the ground floor (making 8 effective storeys) **plus** 6m of plant to be located on the roof.
 - o A standard, mixed-use building is usually 3.5m per floor (with car parking and residential buildings usually being less than this per floor- perhaps 3.1m).
 - o In contrast, the DR reveals that each of the **first 3 levels** of this Development (being Ground floor and Levels 1 and 2) are **each 3.6m** in height with subsequent floors

(Levels 3 to 7) **each being 4.2m**. The rooftop plant adds a further 6.3 m or **2 further storeys** to the building.

The plans indicate that the building tops out at 38.15m which is the equivalent of an 11 storey mixed use building or a 12 storey hotel building.

- (c) The overshadowing effects which are directly related to the unprecedented height of the proposed structure will be significant for us as well as those to the east of the Development.
- (d) The DR suggests that the *visual* amenity of those in close proximity will not be unduly affected. These comments seem preposterous, given the size and bulk of the Development proposal.
- (e) This is a building of enormous proportions and the plan to locate it directly adjacent to a long established residential area such as Kensington and directly to the east of Norwood and the existing, approved Nuova development will dramatically affect the amenity of Nuova residents and owner.

I would urge the decision makers to consider exactly what kind of statement is being made. The grandiose nature of the proposal appears to afford no consideration to the aesthetic of the neighboring historic buildings or the essentially residential character of the surrounding suburbs.

1.5 Residential Historic (Conservation) Zone interface

- (a) Much of the DR deals with the effects on the Kensington area as well as historic buildings located at the 3 corners of the Portrush Road/ Parade intersection.
- (b) It is reasonable that these locations are considered in depth as the effects on these established areas is dramatic, unprecedented and extremely difficult (if not impossible) to justify.
- (c) In concentrating on these areas of concern however, it appears that little or no consideration has been given to the adverse effects on other “neighbours” of which the Nuova Apartments is one.
- (d) In my view the “residential character” of much of the suburbs of Kensington, Norwood and Beulah Park will be affected to one degree or another.
- (e) The above anticipated detrimental effects on our Property alone mean that I will need to re consider whether or not I now wish to reside in this building.
- (f) We are concerned that the equity in the property will be dramatically reduced by the Development. Purchase of the property was to be funded partly from rental incomes

which we anticipated could be generated by the property in future. With the significantly decreased desirability of the location, this will become more difficult

1.6 Comparison with other Developments

- (a) The DR comments at page 23 that:

“Thorough consideration has been given to the surrounding environments by the design team...the following elements have been taken into consideration during the design process:

- *The residential uses adjoining the subject land, particularly along Bowen Street; and*
- *Previous and proposed Development Plan policy changes within the broader locality which may lead to future high rise development being established along the Parade”*

- (b) We presume this reference to policy changes and high-rise development relates specifically to the Nuova Apartments development (and potentially the Bath Apartments further down the Parade. There are other references to the Nuova development scattered throughout the DR.

- (c) It is of concern that a number of these references seem to suggest a correlation between that development and the Peregrine proposal including as to:

- o height equivalency;
- o location of a high-rise development within an historical/residential context.
- o wrapping¹ around an existing historical building

- (d) This correlation, if intended, is **misleading in the extreme**.

- o The approved Nuova building is: 1 Ground floor commercial level with 5 floors of apartments with residential height ceilings.
- o I do not have exact height measurements to hand but believe that the total height of the building could not exceed 21m (roughly **half the height** of the Peregrine Development).
- o While the building is higher than its neighbours on the Parade, it by no means dwarfs them either in height or in bulk.
- o The building does not “wrap around” the State Heritage Place. It is located entirely to the west of that building. The additional red shaded area behind the 252-258 the Parade highlighted in the DR in fact consists of an existing portion of the land title for the project on which an *existing* access “road” is located behind the heritage structure and on which no building, associated with the Nuova Apartments, is to be located.

¹ “In March 2015 the IMDAC approved a redevelopment proposal 254-256 The Parade (DA 155/M053/14). This proposal effective ‘wraps’ around the State Heritage place located at 258-262 The Parade (Ref 2, Image 1), to accommodate a mixed use multi-storey residential and retail development. I understand the development to be 6 storeys in height”

- o The Apartments are wholly located within the business precinct of the Norwood Parade and do not abut existing, established residences or interface with an existing residential zone.

Any implication that the 2 developments are equivalent in size or impact or suggestion that the prior approval of the one justifies the automatic approval of the other, is fatuous.

1.7 Noise and Light Disturbance

(a) Noise

- o We have not had a chance to properly assess the technical noise report contained in the DR.
- o It would be reasonable to assume however that, even if noise levels will be designed to be “within guidelines”, there will be an overall increase in noise levels (including from increased vehicular traffic in the daytime, the concentration of cars entering and exiting the parking structure and from the building plant to be located on the roof level, presumably running both night and day).
- o In any event, we do not believe there is any suggestion in the DR that noise will be reduced so the new noise effects will only add to the cumulative adverse effects on our Property.

(b) Light

- o I read with concern the statement at page 16 that:

*“The building will be **externally illuminated** in order to ensure a safe external environment.....”*
- o There is no information as to where this lighting will be located, its relative brightness, whether it will be directional, movement activated etc,
- o Nighttime illumination of the building will have a direct and adverse effect on residents of the Nuova Apartments. This does not appear to have been addressed in the DR

1.8 Privacy – Overlooking and Security cameras

- (a) I understand that guidelines suggest that if a building is further than 15m away, even a direct sightline into a dwelling will not constitute “overlooking”. We are nevertheless concerned that the 5th floor apartment with windows and balcony facing directly towards the Development will lose privacy as a result of the Development. Again this has not been addressed in any way in the DR.
- (b) At page 16 the DR states that:

“In addition, [that is, in addition to the external illumination to provide a safe external environment], CCTV surveillance will operate both internal and external to the building” and “the decks and balconies provided on upper levels will enable surveillance over public spaces”

- (c) Presumably, such cameras will be angled in such a way as to specifically avoid recording sightlines which include any part of the Nuova Apartments

We seek confirmation from the Proponent that at least this level of privacy will be afforded.

1.9 Wind Turbulence

- (a) We are disadvantaged by the time available to consider the available information and the technical nature of the information relating to this aspect of the Development.
- (b) The ARUP report appears to address concerns at a pedestrian level. No statement has been provided regarding wind-tunneling effects on nearby buildings such as the Nuova Apartments..

2 Property Devaluation

3 Traffic Management Issues

3.1 Concerns

- (a) Our concerns include the following:
 - o Concentration of all traffic to the site at a single bottleneck point (the entrance to the car park); and
 - o along with the increased staffing levels in the new building, an increase in traffic to and from the site of some 25-35%;
 - o location of convenient, plentiful car-parking within the site encouraging existing and future employees (who may otherwise have chosen public transport when parking was in short supply), to drive to the site, again increasing total traffic flows.
- (b) The likely access routes will be:
 - o South along Portrush road and left into High St²
 - o North along Portrush Road and right into High St.
- (c) Traffic studies in the proposal have attempted to assess existing traffic flows. While figures are provided early in the report for the 8am-9am peak period which corresponds

² Coming (a) west down the Parade and left onto Portrush; (b) east up the Parade and right onto Portrush; (c) south along Portrush Road from the north and crossing the Parade.

with the school drop off period at Mary Mackillop College, later assessments seem to largely ignore these figures.

- (d) The risk of traffic queuing across the Parade / Portrush intersection seems, at least anecdotally, to be higher than disclosed in the proposal.
- (e) Almost all employee traffic will be concentrated at the High Street entrance (either turning left from Portrush or right across Portrush Road into High Street) rather than being dispersed more generally in the surrounding streets and access points.
- (f) This, together with the increased number of employees (and tenant employees) and the potential increased number of employees choosing to travel by single vehicle, does not appear to have been taken into account in the projections.
- (g) The notion that employees will choose to cycle or take public transport when convenient, free and plentiful car parking is being made available on site seems naïve at best. We expect that there will be a dramatic increase in vehicular traffic to the site and that the single point car park entrance will become a bottleneck causing dangerous queuing of traffic back along High Street and onto Portrush Road.

3.2 Telecommunications

- (a) We are concerned that no information seems to have been provided as to whether mobile and wi-fi connectivity will be affected in areas to the east and north east (eg Beulah Park) of the development site.
- (b) We believe that this area is mainly serviced by the mobile tower facilities located on the Water Tower at 275 Portrush Road³. Unless it is planned to move these facilities, it is hard to see that the access to mobile and wi-fi services of those residences located *behind* the Development site will not be adversely affected, (to a smaller or larger degree depending on their proximity to the Development).
- (c) Please advise whether the developer will be responsible for relocating these facilities, and if so, to where. While this issue is unlikely to affect our Property, a relocation of services elsewhere may do so.

4 Non-Compliance of DR with DAC approved Guidelines

The DR, as prepared, is deficient in at least the following aspects:

4.1 Pre and Post Development Overshadowing

The approved Guidelines specifically require the Proponent to identify pre-development shadowing effects of the site as well as projected post development shadowing. This information has not been provided.

³ Ref: OzTowers website map

4.2 Development Plan and matters prescribed by Regulations under the Act

- (a) The guidelines state that: *“The DR should detail any expected environmental, social and economic effects of the development, and the extent to which the development is consistent with the provisions of the Council’s Development Plan, the Planning Strategy and any matter prescribed by the Regulations under the Act.”*
- (b) The expression of consistency with the Development Plan necessitate an identification of those areas in which the proposed development is inconsistent with those requirements.
- (c) I note that the current proposal is, arguably inconsistent with some or all of the below quoted “objectives” and “principals” under the Development Plan and that a statement to that effect must be contained in the DR.

“CITY WIDE

Orderly and Sustainable Development

The future development of the City of Norwood Payneham & St Peters will in part be influenced by the development of the Metropolitan area....

It is essential that the future development of the City addresses issues such as increased housing demand, efficient use of infrastructure and population change, while at the same time retaining the City’s built heritage and valued elements of its historic character that play a major role in defining the City’s character.

OBJECTIVES

Objective 1: *Orderly and economic development that creates a safe, convenient and pleasant environment in which to live.*

Objective 2: *A proper distribution of living, working and recreational activities by the allocation of suitable areas of land for those purposes.*

Objective 3: *The provision of such facilities as are required for accommodation, employment, recreation, health and welfare.*

Objective 6: *Co-ordination of the City’s development with that in the abutting council areas, and other council areas which may be affected.*

Objective 7: *Rational distribution of land uses to avoid incompatibility between them.*

Objective 8: *Compatibility of new buildings with the desired environment around them.*

Objective 10: *Development that does not jeopardise the continuance of adjoining authorised land uses.*

Objective 11: *Provision of a choice of lifestyles within the law and custom of the community.*

PRINCIPLES OF DEVELOPMENT CONTROL

1 *Development should be orderly and economic.*

2 *Development should:*

(c) *create a safe, convenient and pleasant place to live.*

3 *Development should take place on land which is suitable for the intended use of that land, having regard to the location and condition of that land and the provisions for the relevant Zone and Policy Area.*

4 *Development should take place in a manner which will not:*

(a) *interfere with the effective and proper use of any other land; and*

(b) *prevent the attainment of the objectives for that other land.*

5 Development should be undertaken in accordance with the Norwood Payneham and St Peters (City) Structure Plan, Map NPSP/1 (Overlay 1) Parts A & B.

6 Development should not take place excessively in advance of a demonstrated need for the use for which it provides.

10 Building development should not take place where it would require substantial excavation or earthworks.

11 Buildings should be designed so as not to unreasonably overlook or overshadow indoor or outdoor living areas of adjacent dwellings.

12 Development should take place in a manner which is not liable to cause an unreasonable nuisance to neighbours or the community or significantly detrimentally affect the amenity, use or enjoyment of nearby properties by:

(a) the emission beyond the site boundaries of noise, vibration, odour, atmospheric liquid or other pollutants, waste water, waste products, electrical interference, light overspill or loss of privacy;

18 Where development is expected to impact upon the existing infrastructure network (including the transport network), development should demonstrate how the undue effect will be addressed.

Design and Appearance of Land and Buildings

OBJECTIVES

Objective 18: The amenity of localities not impaired by the appearance of land, buildings and objects.

Objective 19: Development of a high architectural standard and appearance that responds to and reinforces positive aspects of the local environment and built form.

Objective 21: The continued visual dominance of key reference buildings, such as the Norwood Town Hall, St Peters Town Hall, the Maid and Magpie Hotel, Norwood Hotel, Bon Marche Building, the Payneham Uniting Church and the former Kent Town Brewery Site.

PRINCIPLES OF DEVELOPMENT CONTROL

28 The appearance of land and buildings should not impair the amenity of the locality in which they are situated.

(b) should complement the urban context of existing buildings on adjoining and nearby land in terms of:

(i) maintenance of existing vertical and horizontal building alignments

(c) should not visually dominate the surrounding locality.

31 The design and location of buildings should ensure that adequate natural light is available to adjacent dwellings, with particular consideration given to:

(a) windows of habitable rooms, particularly the living areas of adjacent buildings;

(b) ground-level private open space of adjacent dwellings;

(c) upper level private balconies that provide the primary open space area for any dwelling; and

(d) access to solar energy.

32 The height of buildings, structures and associated component parts should not exceed the number of storeys or height in metres above the natural ground level prescribed in the relevant Zone and/or Policy Area.

For the purposes of this Principle, 'storey' refers to the space between a floor and the next floor above, or if there is no floor above, the ceiling above. A mezzanine floor level shall be regarded as a floor. A space with a floor located below natural ground level shall be regarded as a storey if greater than one metre of the height between the floor level and the floor level above is above natural ground level.

34 Development on corner allotments should:

(a) reinforce the primary and secondary street frontages of the subject site with highly articulated building forms; and

(b) be sited to complement the siting of buildings on the adjacent corner sites.

35 Unless otherwise specified in the relevant Zone and/or Policy Area, where a building is sited on or close to a side boundary, the side boundary wall should be sited and limited in length and height to minimise:

(a) the visual impact of the building as viewed from adjoining properties;

(b) overshadowing of adjoining properties and allow adequate sunlight to neighbouring buildings, private open space and solar collectors (such as solar hot water systems and photovoltaic cells); and

(c) the risk of damage to mature/regulated vegetation on adjoining properties taking into consideration potential damage to the root system.

37 The external walls and roofs of buildings should not incorporate highly reflective materials which will result in excessive glare.

38 Structures located on the roofs of buildings to house plant and equipment, should be screened from view and should form an integral part of the building design in relation to external finishes, shaping and colours.

45 Development in non-residential zones abutting the Residential Zones or the Residential (Historic) Conservation Zones, should not prejudice the attainment of the Objectives relating to the residential zones.

46 Development adjacent to the boundary of a Residential Historic (Conservation) Zone, should provide a transition down in scale and mass to complement the built form within the Residential Historic (Conservation) Zone.

47 Development should not, in respect to its appearance, interfere with the attainment of the Objectives for the relevant Zone or Policy Area or otherwise impact upon the existing character of scenic or environmentally important areas.

48 Outdoor lighting should not result in light spillage on adjacent land

Interface Between Land Uses

OBJECTIVES

Objective 26: Development located and designed to minimise adverse impact and conflict between land uses.

Objective 27: Protect community health and amenity from the adverse impacts of development and support the continued operation of all desired land uses.

PRINCIPLES OF DEVELOPMENT CONTROL

80 Development should not detrimentally affect the amenity of the locality or cause unreasonable interference through any of the following:

(b) noise;

(d) electrical interference;

(e) light spill;

(f) glare;

(h) traffic impacts.

81 Residential development adjacent to a non-residential land use or zone or within a non-residential zone should be located, designed and sited in a manner which:

(a) protects residents from any adverse effects of non-residential activities; and

(b) minimises negative impact on existing and potential future land uses considered appropriate in the locality.

82 Non-residential development in residential zones should:

(a) not detrimentally impact on the amenity of nearby residents;

(b) provide adequate protection for residents of adjoining sites from air and noise pollution, traffic disturbance and other harmful effects on health or amenity; and

(c) not negatively impact on adjoining open space, mature trees or vegetation.

83 Non-residential development adjacent to a residential zone or within a residential zone should be located, designed and sited to minimise overlooking and overshadowing of nearby residential properties.

84 Non-residential development on land abutting a residential zone or within a residential zone should be designed to minimise noise impacts and achieve adequate levels of compatibility between existing and proposed uses.

85 Sensitive land uses which are likely to conflict with the continuation of lawfully existing developments and land uses considered appropriate for the zone should not be developed.

Air Quality

90 Development with the potential to emit harmful or nuisance-generating air pollution should incorporate air pollution control measures to prevent harm to human health or unreasonable interference with the amenity of sensitive uses within the locality

Movement, Transport and Car Parking

Objective 31: *A compatible arrangement between land uses and the transport system which will:*

(a) ensure minimal noise and air pollution;

(b) protect amenity of existing and future land uses;

(c) provide adequate access; and

(d) ensure maximum safety.

Objective 32: *A form of development adjoining main roads which will:*

(a) ensure traffic can move efficiently and safely;

(b) discourage commercial ribbon development;

(c) prevent large traffic-generating uses outside designated shopping/centre zones

PRINCIPLES OF DEVELOPMENT CONTROL

Access

113 Development should be provided with safe and convenient access which:

(a) avoids unreasonable interference with the flow of traffic on adjoining roads;

(b) provides appropriate separation distances from existing roads or level crossings;

(c) accommodates the type and volume of traffic likely to be generated by the development or land use and minimises induced traffic through over-provision; and

(d) is sited and designed to minimise any adverse impacts on the occupants of and visitors to neighbouring properties.

124 Vehicle parking areas should be sited and designed to:

(c) not inhibit safe and convenient traffic circulation;

(i) not dominate the character and appearance of the development when viewed from public roads or spaces.

126 Vehicle parking areas that are likely to be used during non-daylight hours should provide floodlit entry and exit points and site lighting directed and shaded in a manner that will not cause nuisance to adjacent properties or users of the parking area.

132 Vehicle parking spaces and multi-level vehicle parking structures within buildings should:

(b) complement the surrounding built form in terms of height, massing and scale;

Medium and High Rise Development (3 or More Storeys)

Environmental

268 Multi-storey buildings should:

(a) minimise detrimental micro-climatic and solar access impacts on adjacent land or buildings, including effects of patterns of wind, temperature, daylight, sunlight, glare and shadow; and

270 Development of five or more storeys, or 18.5 metres or more in building height (excluding the rooftop location of mechanical plant and equipment), should be designed to minimise the risk of wind tunnelling effects on adjacent streets by adopting one or more of the following.

294 Development within business, centre and shopping zones should conform to the following design principles:

(b) Development should:

(i) comply with the objectives for the Zone or otherwise be compatible with the predominant character of other buildings in the locality; and

(ii) preserve buildings of historical or architectural significance.

(c) Development should provide:

(i) off-street loading, service areas and service vehicle manoeuvring areas;

(ii) lighting for buildings and ancillary areas, with no light spill causing nuisance or hazard; and

(d) Development should not cause nuisance or hazard arising from:

(i) microclimatic conditions;

(iv) overlooking;

(v) overshadowing; or

(vi) visual intrusion.

Heritage

The City of Norwood, Payneham & St Peters derives many benefits from its large number of intact State and local heritage buildings which define a certain character and ambience throughout many parts of the City, setting it apart from other metropolitan areas. It is desired that these places be conserved for the benefit of present and future generations, and to maintain a historic and cultural record of the settlement of the State and the Council area. The conservation of these places also enhances the attractiveness of the Council area to tourists and visitors.

For the purpose of interpreting the Objectives and Principles of Development Control a heritage place in the City of Norwood, Payneham & St Peters is:

- a State Heritage Place entered in the State Heritage Register or a place that is a provisional entry in the Register; or
- a Local Heritage Place.

OBJECTIVES

Objective 110: Development that retains the heritage value of State and Local Heritage Places such that the heritage value of the place, locality and the Council area is reinforced through:

(a) the conservation and complementary development of such places; and

(b) *the complementary development of land and sites adjacent to such places.*

Objective 111: *Development which conserves and reinforces the historic integrity of the Council area and is compatible with the desired character of the appropriate zone and policy area.*

Objective 113: *Public awareness of heritage areas and places within the Council area that are of cultural, environmental, social, historic or architectural significance.*

333 *Development (including land division) should not compromise or detrimentally affect the heritage value, character, integrity, setting, siting or function of buildings or sites of architectural, historic or scientific interest, sites of natural beauty or places of heritage value identified in Tables NPSP/5 and 6 as State or Local Heritage Places.*

Development on land adjacent to land containing a heritage place

345 *Development on land adjacent to land containing a State or Local Heritage Place as designated in Tables NPSP/5 and 6 should respect the heritage value, integrity and character of the heritage place and should clearly demonstrate design consideration of the relationships with the heritage place and its setting (without necessarily replicating its historic detailing) and the character of the locality by establishing compatible:*

- (a) *scale and bulk;*
- (b) *width of frontage and boundary setback patterns;*
- (c) *proportion and composition of design elements;*

346 *Development on land adjacent to land containing a heritage place and sited in strategic locations, such as corners or at the termination of vistas, should have a scale and visual interest in the streetscape at least equal to that of the adjoining heritage place, providing the heritage value of the place within its setting is not diminished.*

347 *Development on land adjacent to land containing a State or Local Heritage Place should not be undertaken if it is likely to dominate or detract from the heritage value and integrity of the heritage place by way of design, appearance or standard of construction.*

Telecommunications Facilities

OBJECTIVES

Objective 120: *Telecommunications facilities provided to meet the needs of the community.*

Telecommunications facilities are an essential infrastructure required to meet the rapidly increasing community demand for communications technologies. To meet this demand there will be a need for new telecommunications facilities to be constructed.

403 *Telecommunications facilities should:*

- (a) *be located and designed to meet the communication needs of the community;*

407 *Telecommunications facilities should not detrimentally affect the character or amenity of Historic Conservation Zones or Policy Areas, Local Heritage Places, State Heritage Places, or State Heritage Areas.*

RESIDENTIAL HISTORIC (CONSERVATION) ZONE

Introduction

The objectives and principles of development control that follow apply in the Residential Historic (Conservation) Zone shown on Maps NPSP/3, 4, 6, 7, 9, 10, 11, 21 and 22. Further objectives and principles of development control also apply to policy areas that are relevant to the zone. The provisions for the zone and its policy areas are additional to the City Wide provisions expressed for the whole of the council area.

Development will preserve and enhance the historic character and ambience of localities by providing for a range of high-quality residential accommodation which reinforces the historic character and residential amenity of the relevant policy area.

New buildings and additions to buildings within this zone will reinforce the existing streetscape and historic building stock. New dwellings will be of a complementary nature which do not compete or stand out against the historic elements for streetscape prominence. They will take into careful consideration the scale of the surrounding dwellings.

OBJECTIVES

Objective 1: *Development that conserves the heritage value and historic character of the Residential Historic (Conservation) Zone and reinforces the desired character of the zone and the relevant policy area.*

Objective 2: *The preservation of areas of historical significance primarily in residential use.*

Objective 3: *The retention, enhancement and conservation of land, buildings and their settings, structures and landscape elements within the Residential Historic (Conservation) Zone that contribute significantly to its heritage value and historic character.*

Objective 4: *Continued residential use in a variety of housing types and at dwelling densities consistent with the historic character for each of the relevant policy areas within the zone.*

Objective 5: *Development that is sympathetic and compatible with the heritage value and historic character of the zone, but is also subordinate to the local historic character in terms of streetscape impact.*

Objective 6: *Development that maintains the established allotment sizes and patterns, siting and orientation of buildings and incorporates high standards of design, building materials and landscaping.*

Objective 7: *The continuance or reintroduction of non-residential use only where there is a historic basis for such a use, or where non-residential use will significantly contribute to the retention of historic character and not impact on residential amenity.*

Objective 8: *Maintenance of a pleasant and functional living environment broadly meeting the needs and expectations of local residents.*

PRINCIPLES OF DEVELOPMENT CONTROL

General

1 *Development should not be undertaken unless it is consistent with the desired character of the zone and the relevant policy area.*

2 *Development should preserve, enhance and reinforce the existing streetscape appeal of the relevant policy area.*

Form and Character

13 *Development should conform to the City Wide provisions of the Development Plan applicable to that type of development, unless conformance with those provisions significantly diminishes the heritage value or historic character of a place.*

14 *The detail and general character of development should complement the identified heritage values of the zone and the policy area in which it is located, as well as the specifically identified heritage places and contributory items listed in Tables NPSP/5, 6 and 7.*

15 *Development should predominantly be for residential purposes and should reflect the historical built form and visual character of the relevant policy area.*

16 *Development of a new building or building addition should demonstrate a compatible visual relationship with the buildings that contribute to the historic character of the relevant policy area through consideration of the following:*

(a) *bulk and scale;*

(b) width of site frontage, front and side boundary setback patterns, wall height and window placement;

(c) the proportions (vertical and horizontal) of additions visible from the street that complement the existing building façade and other elevations facing a public road.

19 Development should not exceed the maximum building height prescribed for each policy area. The height of new buildings, should be consistent with the prevailing building heights with particular reference to adjacent State and Local Heritage Places and contributory items.

21 Redevelopment of corner sites comprising buildings that are not identified heritage places or Contributory Items should provide façades to each street frontage and should complement the siting of heritage places and/or contributory items on the adjacent corner sites.

26 Development within the Residential Historic (Conservation) Zone should be carried out, where applicable, in accordance with the Design Guidelines for Heritage Places and Development in Historic (Conservation) Zones contained in Table NPSP/4.

Interface Height Provisions

14 To minimise building massing at the interface with residential development outside of the zone, buildings should be constructed within a building envelope provided by a 30 degree plane, measured from a height of 3 metres above natural ground level at the zone boundary (except where this boundary is a primary road frontage), as illustrated in Figure 1:

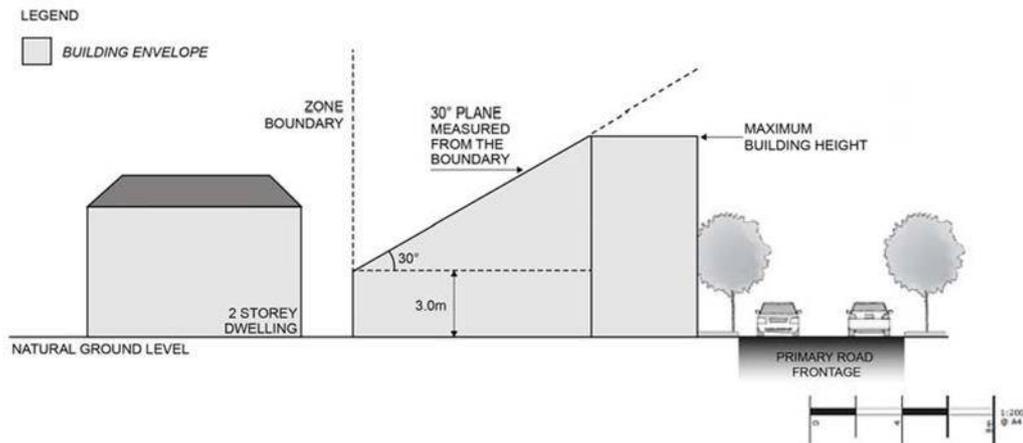


Figure 1”

Ruth Sinclair
Unit 1
112 Beulah Road
NORWOOD SA 5067

24 October 2016

Hon. John Rau MP
Minister for Planning
C/- Mr Robert Kleenman
Unit Manager, Strategic Development Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
ADELAIDE SA 5001

Dear Minister,

Re: PEREGRINE MIXED USE DEVELOPMENT
270 THE PARADE, KENSINGTON

I write in connection with the above planned development. Whilst the application is lengthy and very comprehensive, I have examined the application to the best of my abilities and feel that I understand the majority of the planned development.

I have lived in the area all my life and know the site well.

I wish to object most strongly to the planned development. The intersection of The Parade and Portrush Road has three heritage listed buildings on it. As a member of Clayton Wesley Uniting Church and its community, my major concern relates to the size, visual and physical impact this proposal will have on what is a very significant intersection and heritage location.

I am not against progress and the development of sites, but developments should be in harmony with its surrounds, and I can not see how the depicted building could be considered an enhancement to the surrounding buildings. The proposed building, in my opinion, would be an 'eye sore' amongst such beautiful architecture. Clayton Wesley Church is renowned as one of Adelaide's finest church buildings, an exceptional example of Gothic Revival architecture, and is a well known landmark on The Parade.

The view eastwards along The Parade is quite unique in Adelaide, as it features the towers of three buildings, the Norwood Town Hall, Norwood Wesley Church and Clayton Wesley Church. As the submitted report states, this is 'a historic visual character' of the area, and yet they are quite prepared to destroy this character. The proposed development would destroy the views of Clayton Wesley both from the west and north through its intended size alone.

The proposed building will also exceed the maximum height envisaged for the Kensington area, and would set a precedent for other such buildings in the future, in such a historic area.

Of further concern is the inadequate car parking allowance. There is limited parking on The Parade and no parking whatsoever on Portrush Road, along with very limited parking in Bowen Street and High Street.

The development quotes that 110 jobs are expected to be generated by this development. This would be in addition to the existing 249 employees at the present site. Whilst 296 spaces are allocated in the development, this appears to be extremely inadequate to cover the number of employees of Peregrine at this site, along with café, retail outlets, restaurant and public gymnasium facilities. Patrons of these additional facilities will also want parking. Many of the properties in Bowen Street are already struggling to find adequate parking now.

This area of The Parade is currently congested, especially during morning and afternoon peak times. This development will no doubt hinder the flow of traffic even further especially during the construction period, and the construction period for such a large development will take quite some time.

In closing, I consider the proposed development inappropriate for this site.

Yours faithfully

A handwritten signature in cursive script that reads "R. Sinclair".

Ruth Sinclair

Our Ref: ALS:ALSPersonal

19 October 2016

Minister for Planning
DPTI
GPO Box 1815,
ADELAIDE SA 5001

Attention: Robert Kleeman,
Unit Manager Strategic Development Assessment
Planning and Development, Development Division

By email: majordevadmin@sa.gov.au

Dear Sir/Madam,

Peregrine Mixed Use Development – 270 The Parade, Kensington

I write to you as the freehold owner (see **attached** Certificate of Title) and occupier of 13 High Street, Kensington (**my Property**) which is immediately adjacent to the proposed development site at 207 The Parade, Kensington (the **Development**).

The impact on me will be significant if the Development is approved and proceeds. I object both to the Development proposal and to the decision of the Development Assessment Commission (**DAC**) to assess this Development under s46B of the Development Act 1993 (the **Act**).

I set out in this letter my objections to the DAC's decision and to the Development generally. I set out in the **attached** Submission my specific objections to the Development.

I obtained a USB copy of the Development Report (**DR**) prepared on behalf of the Peregrine Corporation (the **Proponent**) on Monday 17 October. When I sought access to a copy of the DR at the Norwood Council chambers, I was advised that they had "run out of hard copies" and could only provide me with an electronic copy on USB.

I note that the DR is in excess of 350 pages in length; and much of its content is of a technical nature.

DAC Determination of DR Process

A consultation period of 15 business days has been allowed for submissions. This truncated consultation period is due to the DAC decision to assess the Development at the lowest level of scrutiny under s46D of the Act.

This period complies to the letter with the *minimum* statutory requirements of s46D(5)(b) of the Act.

I submit that a minimum assessment level of a PER under s46C of the Act should be required for the Development given,:

1. the extent to which the Development deviates from the development plan (**DP**) for the Norwood, Kensington and St Peters Council (the **Council**) and, presumably also the DP for the Burnside Council area;
2. the extent of the materials contained in the DR and their technical nature;
3. the size and scale of the Development; and
4. its location immediately adjacent to
 - (a) long established residential areas;
 - (b) a Residential Historic (Conservation) zoned area;
 - (c) State Heritage listed buildings; and
5. the permanent and irreversible effects which the Development will have on its surrounds if approved and constructed.

In the alternative, and at the least, I submit that discretion should have been exercised by the Minister to extend the minimum notice requirements under s46D(5)(b) to a reasonable period similar to that provided for a PER or EIS process under the Act.

In light of the above matters (and all other relevant matters which the DAC is required under the Development Regulations to take into consideration), I query the basis on which the DAC could reasonably have determined the level of assessment to be a DR Process.

I request a specific response to this letter advising what materials and further justifications were submitted by the Proponent which led to this determination and information regarding the deliberations of the DAC in assessing the request for Major Project Status under the Act.

If this information cannot be provided pursuant to this request then it is my intention to seek access to this information under the *Freedom of Information Act (FOI)*.

Major Development Status

I am aware that s46 of the Act is specifically designed to limit and/or cut off avenues of complaint, objection or appeal by individuals in respect of developments which are assessed as having a broader community and/or economic value to the State.

The power of this section to place “the good of the many, above the good of the few” comes with a heavy onus on both the Proponent and the State to weigh up competing interests and establish, with reasonable certainty, that the benefits will indeed outweigh the costs.

I have seen little in the DR in the way of objective assessment of the broader economic or social benefits of the Development as against the cost in both monetary terms and more ephemeral, (but equally valuable), concepts of loss of character, history and amenity to the Kensington area and surrounding suburbs.

The Peregrine Corporation and its owners the Shahin family are well known as entrepreneurs and one of, if not the largest private employers in the State. One could however say that the organization is not only known for but also *notorious* for its employment practices. No doubt the company takes care to ensure that its practices fall within the letter of the law, but their public reputation is hardly that of good corporate citizens.

To what extent has DAC or the Minister made investigations into the public standing and corporate background of the Proponents?

Other than the obvious and direct economic benefit of a construction project of this size including, the temporary employment opportunities during the construction phase, to what extent has DAC or the Minister assessed the economic or social benefits **at a State level** of the proposed Development?

To what extent has the Proponent addressed the **detriment to the State** if the Development is not approved? There is little substantiation of this nature in the DR itself.

Objection to Development

The length and complexity of the DR and the limited time period within which to consider its content have hampered my ability to assess the likely impacts and to prepare a submission which addresses the issues in a meaningful way.

Where substantiation for any of my submissions is lacking, it is mainly due to these factors and I foreshadow that I may **seek additional time** to provide further information or submissions.

I am also aware that the owners of my neighbouring property at 15 High Street have been overseas and have only just been made aware, by their tenant, of the existence and extent of this proposal. I am aware that **they wish to lodge an objection** and/or submissions but, due to the truncated consultation period, may now be precluded from doing so in any effective manner.

The principal areas of concern, which I address in the attached Submission, are:

1. Loss of amenity through:
 - (a) overshadowing;
 - (b) visual impact;
 - (c) increased noise and light disturbance;
 - (d) loss of privacy through overlooking and the proposed security measures;
 - (e) wind turbulence effects
2. Effects on the residential character of Kensington, Norwood and Beulah Park more generally;
3. Traffic increases and traffic management issues; and
4. Devaluation of my Property.

I address each of these matters in the attached Submission document.

Except as highlighted below, I have no objection to information contained in the Submission being made public but only for the specific purpose of the Response Document which is to be prepared by the Proponent.

❖ I do not give consent for comments in the Submission which are highlighted in the manner of this paragraph to be made public.

I seek an undertaking from the Proponent that I will be provided a full copy of the Response Document, concurrently with its publication.

Yours sincerely,



Abigail Steed

Email: as@msmlegal.com.au

1 *Loss of amenity*

1.1 *Background*

(a) Background

- I purchased the property at 13 High Street, Kensington, as my principal place of residence in 2001 (see **attached** Certificate of Title).
- The primary attraction of the Property to me was the large areas of glass at the rear overlooking a sunny, but manageable size, rear courtyard together with the additional sun drenched area at the side of the property abutting Bowen Street.
- I had previously lived in an older row-style cottage which had little or no natural light and while living there suffered from symptoms commonly associated with “SAD” (Seasonal Affective Disorder).

(b) Investment

- In 2014 /15 I invested approximately \$30,000 in redesigning the outside areas of my Property to improve the amenity of the rear courtyard and, more particularly the western side of the property, specifically to take better advantage of the western sun which can be enjoyed in this area until late afternoon even in winter months. (See **attached** planning approval and photographs of the improvements made)
- I had the area planted with largely drought tolerant native species which thrive in full sunshine.
- This area is totally shaded in the mornings but enjoys full sun from midday until late afternoon and the planting was specifically selected to take advantage of these full sun conditions.

(c) Consideration of Future Development

- At the time of purchasing my Property it was my understanding that the area was zoned Residential Historic (Conservation) and I believe that is still the case.
- I was aware that 270 The Parade was a commercial building (at that time occupied by a government department) and that there was some possibility that the site could be developed in the future.
- I thought it likely that an additional storey may be added at some point, particularly as a large part of the building is single storey.
- Nevertheless, due to the zoning restrictions on my property, I believed that restrictions in the Development Plan against developments in a Business

Zone abutting a residential zone, would prevent any such development from unduly having a negative impact on the amenity of neighbouring areas and would provide me with protection against any multi story building (at least one in excess of 3 storeys) being constructed in that location.

- My decision to purchase the property was influenced by existing planning conditions in the area.

The size and scale of the current Development proposal has therefore come as a complete shock.

1.2 Overshadowing – Loss of direct sunlight

- (a) I note that the overshadowing projections in the DR have been prepared only up until 3pm in each seasonal period. No consideration is given to loss of direct sunshine and light after that time.

- (b) At page 14 of the DR a discussion of setbacks of the upper floors of the Development states that

“the effect is that the neighbouring properties are only be [sic] overshadowed by the built form from 3pm on the autumn equinox through winter solstice’s [sic] to the spring equinox”

- (c) I have concerns with this statement as follows:

- the overshadowing projections show shadowing of my Property in winter will commence well before 3pm so the statement is not, on its face, factual. I am not an expert in this area but suggest that shadowing of the western façade and rear courtyard of my Property would occur from around 12.30pm (to 1pm at the latest).
- the projections show full shade extending over my entire property and well beyond by 3pm at both the Spring equinox and Autumn equinox which suggests that overshadowing of my Property starts well before the stated 3pm.
- At the summer solstice, the 3pm diagram shows overshadowing about to occur. I currently enjoy full afternoon sunshine in my rear courtyard (and particularly on the western side area) until as late as an hour before sunset (although this obviously varies seasonally).

- (d) At page 27 the DR states *“Importantly, it is evident that the proposal will maintain at least 3 hours of sunlight to the adjacent residential properties to the east.”*

- **This statement is patently untrue as far as it relates to my Property.**

- Unlike other properties on Bowen Street, my Property is positioned in the north-east / south-west orientation – in that it faces onto High Street not Bowen Street.
 - Except in the summer months I receive **virtually no morning sunlight** to any part of my Property. The rear of my Property is shadowed by existing residential buildings in Bowen Street lying to the north east of my property. The western side and front yard are obviously in shadow cast from my own house at these times.
 - Therefore, if the Development proceeds,
 - in **winter** months I will be overshadowed by existing properties to the north-east until shortly before noon and then overshadowed by the Development to the west from shortly after 12 noon – being an hour at best of access to sunlight.
 - **Spring** and **autumn** light will also be substantially diminished as I receive extremely minimal morning sunlight and will be cut off from sunlight well before the 3pm overshadowing stated in the DR.
 - As no data has been provided for the overshadowing effects for periods shorter than 3 hourly intervals, and none is provided for periods after 3pm at all, I am not able to calculate the exact effects but estimate that I would receive less than 2 ½ hours of total sunlight in **spring** and **autumn** and less than 1 ½ hours in **winter**. This is well below the stated minimum of 3 hours in all season in the Development Plan and under guidelines elsewhere.
 - **Contrary to the requirements of the Guidelines** at page 6 that “*Shadow diagrams demonstrating the extent of overshadowing (pre and post development) on adjoining properties...” be provided, information regarding **pre-development** shadowing is not included in the DR.*
 - In the absence of this required information I can only estimate that existing access to daylight at my Property is in the order of:
 - **at least** 4 hours in winter; and
 - **at least** 6 hours in spring and autumn
- (e) I note that the “*uninterrupted views and access to daylight, providing a flexible and pleasant working environment for the contemporary office accommodation*”, referenced at page 15 of the DR, therefore come largely at my expense.

1.3 Overshadowing – Loss of indirect light

- (a) The effects of overshadowing are, of course broader than the loss of *direct* sunlight to outside areas of my Property.
- (b) These areas are of course already shaded from direct sunlight at various times of the day - by neighbouring dwellings, street trees and the shadow of my own house and plantings. These existing, surrounding elements cast shadows but do not “overshadow” in the same sense that the Development proposes to do. That is, to the extent of blocking out all daylight and/or views of the sky from either the outside areas or the internal rooms of my Property.

1.4 Overshadowing – loss of solar amenity

- (a) Currently, direct sunlight reaching the external, ground level of my Property in the winter months, is around 4 hours. In addition however, the western wall of my 2 storey dwelling receives direct solar heating for substantially longer than that period. The overshadowing diagram provided in the DR shows that no direct sunlight will reach that part of my Property from 3pm, at the latest (and I suggest that it is more likely from 12.30pm).
- (b) In around 2012, I invested in double glazing of the large picture windows at the rear of my property in an attempt to reduce heating costs and the carbon footprint of my home. I anticipate that the loss of winter sunlight on the western wall of my Property will significantly increase the need for electricity use in compensating for the lost solar heating effects which this afforded to internal living spaces.
- (c) A number of years ago when replacing my hot water service, I also investigated the possibility of installing solar panels on my roof. I have revisited that thought on a number of occasions, including in response to recent Government subsidies which have been available in different forms, from time to time. I have been advised that my Property is not ideally oriented for the use of solar infrastructure but if I were to install panels they would need to go on the north- western roof slope (ie facing onto Bowen Street). Obviously if the development proceeds, any option for converting to solar power will be entirely precluded.

Personal effects of Overshadowing

In summary, I perceive that the overshadowing effects of the Development will have the following adverse impacts on me as both the owner and occupier of my Property:

1.5 Visual Amenity

- (a) The height and bulk of the Development are both unprecedented.
- (b) In the briefing which I, (and residents of Bowen Street) received directly from the Proponent, (**Residents' Briefing**) it was stressed that the building would be *only* 7 storeys in height – (that being enough cause for concern at the time).
- (c) Having subsequently read the DR, **I find these statements by the Proponent to be misleading and entirely disingenuous.**
 - Firstly, there are 7 storeys above the ground floor (making 8 effective storeys) **plus** 6m of plant to be located on the roof.
 - The internet¹ tells me that, a standard, mixed-use building is usually 3.5m per floor (with car parking and residential buildings usually being less than this per floor- perhaps 3.1m).
 - In contrast, the DR reveals that each of the **first 3 levels** of this Development (being Ground floor and Levels 1 and 2) are **each 3.6m** in height with subsequent floors (Levels 3 to 7) **each being 4.2m**. The rooftop plant adds a further 6.3 m or **2 further storeys** to the building.

The plans indicate that the building tops out at 38.15m which is the equivalent of an 11 storey mixed use building or a 12 storey hotel building.

¹ I have had no time for more investigation of building standards in South Australia.

- (d) In addition to the overshadowing effects which are directly related to the unprecedented height of the proposed structure, the DR suggests that the visual amenity of Bowen Street residents (which I take as including me) will not be affected because they are already looking onto a blank brick wall of a commercial building. I submit that there is a significant difference between looking at 1 storey of blank wall² and being faced with 11-12 storeys of a structure which blots out the skyline entirely.
- (e) Currently I am able to clearly see the spire and steeple of the Clayton Wesley Church from my back yard and much of its roofline as well from the upstairs windows of my Property.

The suggestion by the Proponents that my visual amenity will not be adversely impacted is, quite frankly, offensive.

- (f) This is a building of enormous proportions and the plan to locate it directly adjacent to a long established residential area on which it will have both a physical and metaphorical overshadowing effect is distressing.
- (g) A standard 5 storey building in this location would be noticed and cause comment (and be less than desirable from my personal perspective) but this proposed monolith, which will tower over even the tallest of surrounding buildings, would be a blight on the character of not just the Kensington area but 5 suburbs in every direction.
- (h) During the Residents' Briefing it was highlighted that the owners of the site wish to create a building which would make a lasting statement and, to that end, were sparing no expense.

I would urge the decision makers to consider exactly what kind of statement is being made. The grandiose nature of the proposal appears to be hubris in the extreme, with no consideration given to the aesthetic of the neighbouring historic buildings or the essentially residential character of the suburb in which it is located.

1.6 Residential Historic (Conservation) Zone interface

- (a) In addressing issues of "interface" with its neighbours the DR states variously:

at page 21: "...Bowen Street and High Street (at the interface with The Subject Site have very limited historic character".

at page 22: "While the proposed development is notably taller than that across High Street, I consider it to have negligible impacts on the amenity and character of this interface as:....the current residential and historic character of High Street along this frontage is low/poor"

² which is in fact hardly visible above the fence line of my Property

tenanted property in Bowen Street has lost its tenant as a direct consequence of concerns about the Development.

- (h) If I were renting at this time, I would certainly not choose my Property if made aware of the imminent threat of future overshadowing and the disruption which will inevitably come with a construction phase of at least 12 months.

1.7 Comparison with other Developments

- (a) I note comments at page 23 that:

“Thorough consideration has been given to the surrounding environments by the design team...the following elements have been taken into consideration during the design process:

- ...
- *The residential uses adjoining the subject land, particularly along Bowen Street; and*
- *Previous and proposed Development Plan policy changes within the broader locality which may lead to future high rise development being established along the Parade”*

- (b) I presume this reference to policy changes and high-rise development relates specifically to the Nuova Apartments development on the Parade (and potentially the Bath Apartments further down the Parade. There are other references to the Nuova development scattered throughout the DR.

- (c) It is of concern to me that a number of these references seem to suggest a correlation between that development and the Peregrine proposal including as to:

- height equivalency;
- location of a high-rise development within an historical/residential context.
- wrapping⁴ around an existing historical building

- (d) This correlation, if intended, **is misleading in the extreme.**

- (e) I am familiar with the Nuova development⁵.

- The approved Nuova building is: 1 Ground floor commercial level with 5 floors of apartments with residential height ceilings.

⁴ “In March 2015 the IMDAC approved a redevelopment proposal 254-256 The Parade (DA 155/M053/14). This proposal effectively ‘wraps’ around the State Heritage place located at 258-262 The Parade (Ref 2, Image 1), to accommodate a mixed use multi-storey residential and retail development. I understand the development to be 6 storeys in height”

- I do not have exact height measurements to hand but believe that the total height of the building could not exceed 21m (roughly **half the height** of the Peregrine Development).
- While the building is higher than its neighbours on the Parade, it by no means dwarfs them either in height or in bulk.
- The building does not “wrap around” the State Heritage Place. It is located entirely to the west of that building. The additional red shaded area behind the 252-258 the Parade highlighted in the DR in fact consists of an existing portion of the land title for the project on which an *existing* access “road” is located behind the heritage structure and on which no building, associated with the Nuova Apartments, is to be located.
- The Apartments are wholly located within the business precinct of the Norwood Parade and do not abut existing, established residences or interface with an existing residential zone.

Any implication that the 2 developments are equivalent in size or impact or suggestion that the prior approval of the one justifies the automatic approval of the other, is fatuous.

1.8 Noise and Light Disturbance

(a) Noise

- I have not had a chance to properly assess the technical noise report contained in the DR.
- It would be reasonable to assume however that, even if noise levels will be designed to be “within guidelines”, there will be an overall increase in noise levels (including from increased vehicular traffic in the daytime, the concentration of cars entering and exiting the parking structure and from the building plant to be located on the roof level, presumably running both night and day).
- In any event, I do not believe there is any suggestion in the DR that noise will be reduced so the new noise effects will only add to the cumulative adverse effects on my Property.

(b) Light

- I read with concern the statement at page 16 that:

*“The building will be **externally illuminated** in order to ensure a safe external environment.....”*
- There is no information as to where this lighting will be located, its relative brightness, whether it will be directional, movement activated etc,

- Presumably “the safety of the external environment”, will take precedence over any disturbance which may be caused to the “limited number of residences” on Bowen/ High street whose residents may be kept awake by lights either constant or flashing.

1.9 Privacy – Overlooking and Security cameras

- (a) I was assured by the Proponents at the Residents’ Briefing that there was no possibility of overlooking my Property due to the step-back nature of the building design. Presumably this was based on the “guidelines” that if the view of someone nude sunbathing in their back yard is from a distance of 15m or more, the observer is deemed to be blind. Of course, as there will be no sun in which to nude bath, there is really no problem!
- (b) My reading of the diagrammatic visualizations provided in the DR is that there is a direct line of sight into my Property from the deck around the first level of office buildings above the car park. Ostensibly however, the distance from, that angle is something between 15 and 20m technically my Property is not overlooked, notwithstanding that all privacy in the outside areas of my Property will be lost.
- (c) Presumably other Bowen Street residents whose bedroom windows and front entrances are directly overlooked will have similar concerns.
- (d) At page 16 the DR states that:

“In addition, [that is, in addition to the external illumination to provide a safe external environment], CCTV surveillance will operate both internal and external to the building” and “the decks and balconies provided on upper levels will enable surveillance over public spaces”
- (e) Presumably, such cameras will be angled in such a way as to specifically avoid recording sightlines which include any part of my Property. I assume that other residents of Bowen Street would also take exception to their front driveways being subject to CCTV surveillance

If the Development proceeds, I seek confirmation from the Proponent that at least this level of privacy will be afforded.

1.10 Wind Turbulence

- (a) Again I am disadvantaged by the time available to consider the available information and the technical nature of the information relating to this aspect of the Development.
- (b) On my lay reading of the ARUP report, the only area which will be specifically, adversely affected by wind-tunneling is “**High Street near the corner of Bowen Street**” ie my Property.

- (c) The report appears to look mainly at the impact of wind on pedestrians (and to some extent those who may be enjoying the sunshine at the café on the south western corner of the Development). The summary at page 9 of the Report notably states:

“South-westerlies incident the Portrush Road façade may result in accelerations around the corner to Bowen Street. However, given that this space is likely only to be used as a transitional area, this is considered likely acceptable”.

Figure 7 identifies that the level 4 wind occurrences (ie those causing discomfort except for 8-10m/s for “fast or business walking”) directly affect my Property and in particular the western side outdoor area that is at present most conducive to outdoor enjoyment.

2 Property Devaluation

3 Traffic Management Issues

3.1 General

- (a) As indicated above, I do not suffer from the current issues experienced by residents of Bowen Street regarding day time commercial delivery vehicles using that street to access warehouse facilities but understand that this is one of the traffic management issues which the development is designed to address.

- (b) That is welcome and the second stage proposal to allow two way access to the street at the northern end seems sensible.

3.2 Concerns

- (a) My concern lies with the 3 levels of parking (including one underground level) and the single entry point off High Street in close proximity to Portrush Road.
- (b) The Proponent argues that this will alleviate the issue of employee cars:
- parking on High and surrounding side streets during the day;
 - driving through surrounding streets at peak times looking for street parking.
- (c) This may be true but the downsides are that it will instead:
- concentrate all of this traffic at a single bottleneck point (the entrance to the car park; and
 - along with the increased staffing levels in the new building, actually increase traffic to and from the site by 25-35%;
 - encourage existing and future employees who may have chosen public transport when parking was in short supply, to drive to the site, again increasing total traffic flows.
- (d) The likely access routes will be:
- South along Portrush road and left into High St⁶
 - North along Portrush Road and right into High St.
- (e) Presumably there will also be some who wish to access the car park by travelling west down High St (entering High St from some point further up the Parade or Kensington Road), thus needing to turn right into the car park (unless this method of access is intended to be precluded). The DR is not clear on this point.
- (f) Traffic studies in the proposal have attempted to assess existing traffic flows. While figures are provided early in the report for the 8am-9am peak period which corresponds with the school drop off period at Mary Mackillop College, later assessments seem to largely ignore these figures.
- (g) The risk of traffic queuing across the Parade / Portrush intersection seems, at least anecdotally, to be higher than disclosed in the proposal.

⁶ Coming (a) west down the Parade and left onto Portrush; (b) east up the Parade and right onto Portrush; (c) south along Portrush Road from the north and crossing the Parade.

- (h) Almost all employee traffic will be concentrated at the High Street entrance (either turning left from Portrush or right across Portrush Road into High Street) rather than being dispersed more generally in the surrounding streets and access points.
- (i) This, together with the increased number of employees (and tenant employees) and the potential increased number of employees choosing to travel by single vehicle, does not appear to have been taken into account in the projections.
- (j) The notion that employees will choose to cycle or take public transport when convenient, free and plentiful car parking is being made available on site seems naïve at best. I expect that there will be a dramatic increase in vehicular traffic to the site and that the single point car park entrance will become a bottleneck causing dangerous queuing of traffic back along High Street and onto Portrush Road.

3.3 Car park fumes

- (a) At the Residents' Briefing, much was made of the planned treatment of the ground level car park façade and the intention to apply vertical sandstone fins to the external wall to improve aesthetics while still complying with building code requirements for ventilation of the structure.
- (b) I understood this to mean that, the concentration of vehicular fumes from some 290 cars within the structure are acknowledged to be a health hazard for users unless the fumes are dispersed away from the structure.
- (c) My query as to the effects of that concentration of exhaust fumes being dispersed directly towards the neighbouring properties was dismissed out of hand. I was told that the fumes simply dissipate into the surrounding atmosphere with no more harmful effects than those emitted by cars on neighbouring streets.
- (d) The argument was made that these vehicles already travel to the area and therefore the effects can be no greater than already exist.
- (e) With respect, I believe it has long been established that there are health consequences associated with living next to busy roads so my question was not an idle one.

- (f) I have chosen to live near to Portrush Road and the Parade; both busy thoroughfares. **I did not choose to live next to a multi-storey parking structure** designed to accommodate some 290 vehicles.
- (g) I submit that:
- Existing vehicle movements are currently dispersed throughout the neighbouring streets;
 - The parking structure will capture and concentrate emissions in one centralised location;
 - The volume of traffic will be increased significantly (as noted above) and this new traffic will also be concentrated in and around the parking structure.

Please advise whether any studies are available or will be undertaken regarding the health effects of living in close proximity to such a structure where exhaust fumes are ventilated directly to the adjoining air spaces. It seems reasonable to expect that there would be some adverse effects.

Please also advise whether consideration has been given to requiring the extraction and exhausting of emissions away from habitations.

3.4 Telecommunications

- (a) I am concerned that no information seems to have been provided as to whether mobile and wi-fi connectivity will be affected in areas to the east and north east (eg Beulah Park) of the development site.
- (b) I believe that this area is mainly serviced by the mobile tower facilities located on the Water Tower at 275 Portrush Road⁷. Unless it is planned to move these facilities, it is hard to see that the access to mobile and wi-fi services of those residences located *behind* the Development site will not be adversely affected, (to a smaller or larger degree depending on their proximity to the Development).

Please advise whether the developer will be responsible for relocating these facilities, and if so, to where.

4 Non-Compliance of DR with DAC approved Guidelines

I submit that the DR, as prepared, is deficient in at least the following aspects:

4.1 Pre and Post Development Overshadowing

⁷ Ref: OzTowers website map

The approved Guidelines specifically require the Proponent to identify pre-development shadowing effects of the site as well as projected post development shadowing. This information has not been provided.

4.2 Development Plan and matters prescribed by Regulations under the Act

- (a) The guidelines state that: *“The DR should detail any expected environmental, social and economic effects of the development, and the extent to which the development is **consistent with the provisions of the Council’s Development Plan**, the Planning Strategy and any matter prescribed by the Regulations under the Act.”*
- (b) The expression of consistency with the Development Plan necessitate an identification of those areas in which the proposed development is inconsistent with those requirements.
- (c) I note that the current proposal is, arguably inconsistent with some or all of the “objectives” and “principals” under the Development Plan quoted in the annexure over page. I have identified more than 70 items in the Development Plan with which the Development is party, or wholly, inconsistent. On my reading of the Guidelines, a statement identifying these inconsistencies must be contained in the DR.

Development Plan for the Norwood Payneham and St Peters (City) (extracts)

"CITY WIDE

Orderly and Sustainable Development

The future development of the City of Norwood Payneham & St Peters will in part be influenced by the development of the Metropolitan area....

It is essential that the future development of the City addresses issues such as increased housing demand, efficient use of infrastructure and population change, while at the same time retaining the City's built heritage and valued elements of its historic character that play a major role in defining the City's character.

OBJECTIVES

Objective 1: *Orderly and economic development that creates a safe, convenient and pleasant environment in which to live.*

Objective 2: *A proper distribution of living, working and recreational activities by the allocation of suitable areas of land for those purposes.*

Objective 3: *The provision of such facilities as are required for accommodation, employment, recreation, health and welfare.*

Objective 6: *Co-ordination of the City's development with that in the abutting council areas, and other council areas which may be affected.*

Objective 7: *Rational distribution of land uses to avoid incompatibility between them.*

Objective 8: *Compatibility of new buildings with the desired environment around them.*

Objective 10: *Development that does not jeopardise the continuance of adjoining authorised land uses.*

Objective 11: *Provision of a choice of lifestyles within the law and custom of the community.*

PRINCIPLES OF DEVELOPMENT CONTROL

1 *Development should be orderly and economic.*

2 *Development should:*

(c) *create a safe, convenient and pleasant place to live.*

3 *Development should take place on land which is suitable for the intended use of that land, having regard to the location and condition of that land and the provisions for the relevant Zone and Policy Area.*

4 *Development should take place in a manner which will not:*

(a) *interfere with the effective and proper use of any other land; and*

(b) *prevent the attainment of the objectives for that other land.*

5 *Development should be undertaken in accordance with the Norwood Payneham and St Peters (City) Structure Plan, Map NPSP/1 (Overlay 1) Parts A & B.*

6 *Development should not take place excessively in advance of a demonstrated need for the use for which it provides.*

10 *Building development should not take place where it would require substantial excavation or earthworks.*

11 *Buildings should be designed so as not to unreasonably overlook or overshadow indoor or outdoor living areas of adjacent dwellings.*

12 *Development should take place in a manner which is not liable to cause an unreasonable nuisance to neighbours or the community or significantly detrimentally affect the amenity, use or enjoyment of nearby properties by:*

(a) the emission beyond the site boundaries of noise, vibration, odour, atmospheric liquid or other pollutants, waste water, waste products, electrical interference, light overspill or loss of privacy;

18 Where development is expected to impact upon the existing infrastructure network (including the transport network), development should demonstrate how the undue effect will be addressed.

Design and Appearance of Land and Buildings

OBJECTIVES

Objective 18: The amenity of localities not impaired by the appearance of land, buildings and objects.

Objective 19: Development of a high architectural standard and appearance that responds to and reinforces positive aspects of the local environment and built form.

Objective 21: The continued visual dominance of key reference buildings, such as the Norwood Town Hall, St Peters Town Hall, the Maid and Magpie Hotel, Norwood Hotel, Bon Marche Building, the Payneham Uniting Church and the former Kent Town Brewery Site.

PRINCIPLES OF DEVELOPMENT CONTROL

28 The appearance of land and buildings should not impair the amenity of the locality in which they are situated.

(b) should complement the urban context of existing buildings on adjoining and nearby land in terms of:

(i) maintenance of existing vertical and horizontal building alignments

(c) should not visually dominate the surrounding locality.

31 The design and location of buildings should ensure that adequate natural light is available to adjacent dwellings, with particular consideration given to:

(a) windows of habitable rooms, particularly the living areas of adjacent buildings;

(b) ground-level private open space of adjacent dwellings;

(c) upper level private balconies that provide the primary open space area for any dwelling; and

(d) access to solar energy.

32 The height of buildings, structures and associated component parts should not exceed the number of storeys or height in metres above the natural ground level prescribed in the relevant Zone and/or Policy Area.

For the purposes of this Principle, 'storey' refers to the space between a floor and the next floor above, or if there is no floor above, the ceiling above. A mezzanine floor level shall be regarded as a floor. A space with a floor located below natural ground level shall be regarded as a storey if greater than one metre of the height between the floor level and the floor level above is above natural ground level.

34 Development on corner allotments should:

(a) reinforce the primary and secondary street frontages of the subject site with highly articulated building forms; and

(b) be sited to complement the siting of buildings on the adjacent corner sites.

35 Unless otherwise specified in the relevant Zone and/or Policy Area, where a building is sited on or close to a side boundary, the side boundary wall should be sited and limited in length and height to minimise:

(a) the visual impact of the building as viewed from adjoining properties;

(b) overshadowing of adjoining properties and allow adequate sunlight to neighbouring buildings, private open space and solar collectors (such as solar hot water systems and photovoltaic cells); and

(c) the risk of damage to mature/regulated vegetation on adjoining properties taking into consideration potential damage to the root system.

37 The external walls and roofs of buildings should not incorporate highly reflective materials which will result in excessive glare.

38 Structures located on the roofs of buildings to house plant and equipment, should be screened from view and should form an integral part of the building design in relation to external finishes, shaping and colours.

45 Development in non-residential zones abutting the Residential Zones or the Residential (Historic) Conservation Zones, should not prejudice the attainment of the Objectives relating to the residential zones.

46 Development adjacent to the boundary of a Residential Historic (Conservation) Zone, should provide a transition down in scale and mass to complement the built form within the Residential Historic (Conservation) Zone.

47 Development should not, in respect to its appearance, interfere with the attainment of the Objectives for the relevant Zone or Policy Area or otherwise impact upon the existing character of scenic or environmentally important areas.

48 Outdoor lighting should not result in light spillage on adjacent land

Interface Between Land Uses

OBJECTIVES

Objective 26: Development located and designed to minimise adverse impact and conflict between land uses.

Objective 27: Protect community health and amenity from the adverse impacts of development and support the continued operation of all desired land uses.

PRINCIPLES OF DEVELOPMENT CONTROL

80 Development should not detrimentally affect the amenity of the locality or cause unreasonable interference through any of the following:

- (b) noise;
- (d) electrical interference;
- (e) light spill;
- (f) glare;
- (h) traffic impacts.

81 Residential development adjacent to a non-residential land use or zone or within a non-residential zone should be located, designed and sited in a manner which:

- (a) protects residents from any adverse effects of non-residential activities; and
- (b) minimises negative impact on existing and potential future land uses considered appropriate in the locality.

82 Non-residential development in residential zones should:

- (a) not detrimentally impact on the amenity of nearby residents;
- (b) provide adequate protection for residents of adjoining sites from air and noise pollution, traffic disturbance and other harmful effects on health or amenity; and
- (c) not negatively impact on adjoining open space, mature trees or vegetation.

83 Non-residential development adjacent to a residential zone or within a residential zone should be located, designed and sited to minimise overlooking and overshadowing of nearby residential properties.

84 Non-residential development on land abutting a residential zone or within a residential zone should be designed to minimise noise impacts and achieve adequate levels of compatibility between existing and proposed uses.

85 Sensitive land uses which are likely to conflict with the continuation of lawfully existing developments and land uses considered appropriate for the zone should not be developed.

Air Quality

90 Development with the potential to emit harmful or nuisance-generating air pollution should incorporate air pollution control measures to prevent harm to human health or unreasonable interference with the amenity of sensitive uses within the locality

Movement, Transport and Car Parking

Objective 31: A compatible arrangement between land uses and the transport system which will:

- (a) ensure minimal noise and air pollution;
- (b) protect amenity of existing and future land uses;
- (c) provide adequate access; and
- (d) ensure maximum safety.

Objective 32: A form of development adjoining main roads which will:

- (a) ensure traffic can move efficiently and safely;
- (b) discourage commercial ribbon development;
- (c) prevent large traffic-generating uses outside designated shopping/centre zones

PRINCIPLES OF DEVELOPMENT CONTROL

Access

113 Development should be provided with safe and convenient access which:

- (a) avoids unreasonable interference with the flow of traffic on adjoining roads;
- (b) provides appropriate separation distances from existing roads or level crossings;
- (c) accommodates the type and volume of traffic likely to be generated by the development or land use and minimises induced traffic through over-provision; and
- (d) is sited and designed to minimise any adverse impacts on the occupants of and visitors to neighbouring properties.

124 Vehicle parking areas should be sited and designed to:

- (c) not inhibit safe and convenient traffic circulation;
- (i) not dominate the character and appearance of the development when viewed from public roads or spaces.

126 Vehicle parking areas that are likely to be used during non-daylight hours should provide floodlit entry and exit points and site lighting directed and shaded in a manner that will not cause nuisance to adjacent properties or users of the parking area.

132 Vehicle parking spaces and multi-level vehicle parking structures within buildings should:

- (b) complement the surrounding built form in terms of height, massing and scale;

Medium and High Rise Development (3 or More Storeys)

Environmental

268 Multi-storey buildings should:

- (a) minimise detrimental micro-climatic and solar access impacts on adjacent land or buildings, including effects of patterns of wind, temperature, daylight, sunlight, glare and shadow; and

270 Development of five or more storeys, or 18.5 metres or more in building height (excluding the rooftop location of mechanical plant and equipment), should be designed to minimise the risk of wind tunnelling effects on adjacent streets by adopting one or more of the following.

294 Development within business, centre and shopping zones should conform to the following design principles:

(b) Development should:

(i) comply with the objectives for the Zone or otherwise be compatible with the predominant character of other buildings in the locality; and

(ii) preserve buildings of historical or architectural significance.

(c) Development should provide:

(i) off-street loading, service areas and service vehicle manoeuvring areas;

(ii) lighting for buildings and ancillary areas, with no light spill causing nuisance or hazard; and

(d) Development should not cause nuisance or hazard arising from:

(i) microclimatic conditions;

(iv) overlooking;

(v) overshadowing; or

(vi) visual intrusion.

Heritage

The City of Norwood, Payneham & St Peters derives many benefits from its large number of intact State and local heritage buildings which define a certain character and ambience throughout many parts of the City, setting it apart from other metropolitan areas. It is desired that these places be conserved for the benefit of present and future generations, and to maintain a historic and cultural record of the settlement of the State and the Council area. The conservation of these places also enhances the attractiveness of the Council area to tourists and visitors.

For the purpose of interpreting the Objectives and Principles of Development Control a heritage place in the City of Norwood, Payneham & St Peters is:

- a State Heritage Place entered in the State Heritage Register or a place that is a provisional entry in the Register; or
- a Local Heritage Place.

OBJECTIVES

Objective 110: Development that retains the heritage value of State and Local Heritage Places such that the heritage value of the place, locality and the Council area is reinforced through:

(a) the conservation and complementary development of such places; and

(b) the complementary development of land and sites adjacent to such places.

Objective 111: Development which conserves and reinforces the historic integrity of the Council area and is compatible with the desired character of the appropriate zone and policy area.

Objective 113: Public awareness of heritage areas and places within the Council area that are of cultural, environmental, social, historic or architectural significance.

333 Development (including land division) should not compromise or detrimentally affect the heritage value, character, integrity, setting, siting or function of buildings or sites of architectural, historic or scientific interest, sites of natural beauty or places of heritage value identified in Tables NPSP/5 and 6 as State or Local Heritage Places.

Development on land adjacent to land containing a heritage place

345 Development on land adjacent to land containing a State or Local Heritage Place as designated in Tables NPSP/5 and 6 should respect the heritage value, integrity and character of the heritage place and should clearly demonstrate design consideration of the relationships with the heritage place and its setting (without necessarily replicating its historic detailing) and the character of the locality by establishing compatible:

- (a) scale and bulk;
- (b) width of frontage and boundary setback patterns;
- (c) proportion and composition of design elements;

346 Development on land adjacent to land containing a heritage place and sited in strategic locations, such as corners or at the termination of vistas, should have a scale and visual interest in the streetscape at least equal to that of the adjoining heritage place, providing the heritage value of the place within its setting is not diminished.

347 Development on land adjacent to land containing a State or Local Heritage Place should not be undertaken if it is likely to dominate or detract from the heritage value and integrity of the heritage place by way of design, appearance or standard of construction.

Telecommunications Facilities

OBJECTIVES

Objective 120: Telecommunications facilities provided to meet the needs of the community.

Telecommunications facilities are an essential infrastructure required to meet the rapidly increasing community demand for communications technologies. To meet this demand there will be a need for new telecommunications facilities to be constructed.

403 Telecommunications facilities should:

- (a) be located and designed to meet the communication needs of the community;

407 Telecommunications facilities should not detrimentally affect the character or amenity of Historic Conservation Zones or Policy Areas, Local Heritage Places, State Heritage Places, or State Heritage Areas.

RESIDENTIAL HISTORIC (CONSERVATION) ZONE

Introduction

The objectives and principles of development control that follow apply in the Residential Historic (Conservation) Zone shown on Maps NPSP/3, 4, 6, 7, 9, 10, 11, 21 and 22. Further objectives and principles of development control also apply to policy areas that are relevant to the zone. The provisions for the zone and its policy areas are additional to the City Wide provisions expressed for the whole of the council area.

Development will preserve and enhance the historic character and ambience of localities by providing for a range of high-quality residential accommodation which reinforces the historic character and residential amenity of the relevant policy area.

New buildings and additions to buildings within this zone will reinforce the existing streetscape and historic building stock. New dwellings will be of a complementary nature which do not compete or stand out against the historic elements for streetscape prominence. They will take into careful consideration the scale of the surrounding dwellings.

OBJECTIVES

Objective 1: Development that conserves the heritage value and historic character of the Residential Historic (Conservation) Zone and reinforces the desired character of the zone and the relevant policy area.

Objective 2: *The preservation of areas of historical significance primarily in residential use.*

Objective 3: *The retention, enhancement and conservation of land, buildings and their settings, structures and landscape elements within the Residential Historic (Conservation) Zone that contribute significantly to its heritage value and historic character.*

Objective 4: *Continued residential use in a variety of housing types and at dwelling densities consistent with the historic character for each of the relevant policy areas within the zone.*

Objective 5: *Development that is sympathetic and compatible with the heritage value and historic character of the zone, but is also subordinate to the local historic character in terms of streetscape impact.*

Objective 6: *Development that maintains the established allotment sizes and patterns, siting and orientation of buildings and incorporates high standards of design, building materials and landscaping.*

Objective 7: *The continuance or reintroduction of non-residential use only where there is a historic basis for such a use, or where non-residential use will significantly contribute to the retention of historic character and not impact on residential amenity.*

Objective 8: *Maintenance of a pleasant and functional living environment broadly meeting the needs and expectations of local residents.*

PRINCIPLES OF DEVELOPMENT CONTROL

General

1 *Development should not be undertaken unless it is consistent with the desired character of the zone and the relevant policy area.*

2 *Development should preserve, enhance and reinforce the existing streetscape appeal of the relevant policy area.*

Form and Character

13 *Development should conform to the City Wide provisions of the Development Plan applicable to that type of development, unless conformance with those provisions significantly diminishes the heritage value or historic character of a place.*

14 *The detail and general character of development should complement the identified heritage values of the zone and the policy area in which it is located, as well as the specifically identified heritage places and contributory items listed in Tables NPSP/5, 6 and 7.*

15 *Development should predominantly be for residential purposes and should reflect the historical built form and visual character of the relevant policy area.*

16 *Development of a new building or building addition should demonstrate a compatible visual relationship with the buildings that contribute to the historic character of the relevant policy area through consideration of the following:*

(a) *bulk and scale;*

(b) *width of site frontage, front and side boundary setback patterns, wall height and window placement;*

(c) *the proportions (vertical and horizontal) of additions visible from the street that complement the existing building façade and other elevations facing a public road.*

19 *Development should not exceed the maximum building height prescribed for each policy area. The height of new buildings, should be consistent with the prevailing building heights with particular reference to adjacent State and Local Heritage Places and contributory items.*

21 *Redevelopment of corner sites comprising buildings that are not identified heritage places or Contributory Items should provide facades to each street frontage and should complement the siting of heritage places and/or contributory items on the adjacent corner sites.*

26 Development within the Residential Historic (Conservation) Zone should be carried out, where applicable, in accordance with the Design Guidelines for Heritage Places and Development in Historic (Conservation) Zones contained in Table NPSP/4.

Interface Height Provisions

14 To minimise building massing at the interface with residential development outside of the zone, buildings should be constructed within a building envelope provided by a 30 degree plane, measured from a height of 3 metres above natural ground level at the zone boundary (except where this boundary is a primary road frontage), as illustrated in Figure 1:

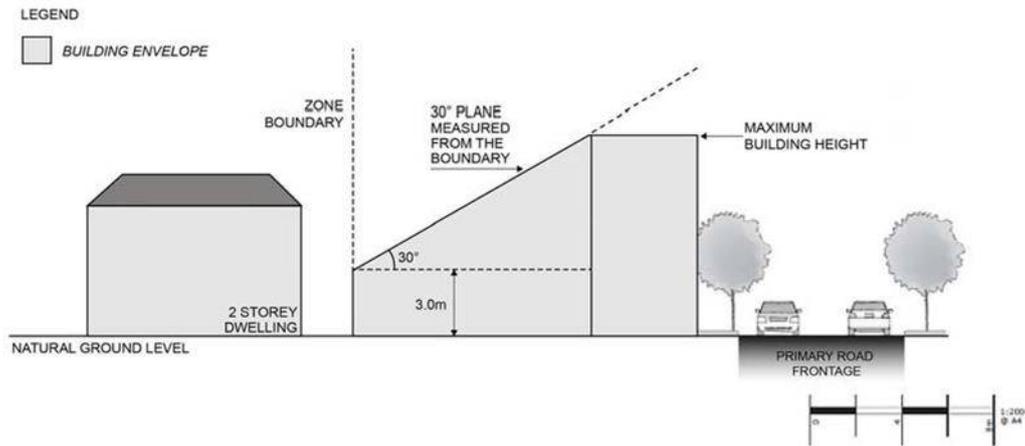


Figure 1”

Annexures:

WARNING: BEFORE DEALING WITH THIS LAND, SEARCH THE CURRENT CERTIFICATE

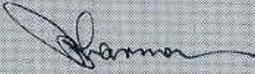
CERTIFICATE OF TITLE
REAL PROPERTY ACT, 1886



South Australia

VOLUME 5075 FOLIO 369
Edition 3
Date Of Issue 16/06/1992
Authority RTD 7276825

I certify that the registered proprietor is the proprietor of an estate in fee simple (or such other estate or interest as is set forth) in the land within described subject to such encumbrances, liens or other interests set forth in the schedule of endorsements.


REGISTRAR-GENERAL 

REGISTERED PROPRIETOR IN FEE SIMPLE

ABIGAIL LAURA STEED OF 13 HIGH STREET KENSINGTON SA 5068

DESCRIPTION OF LAND

ALLOTMENT 3 DEPOSITED PLAN 34217
IN THE AREA NAMED KENSINGTON
HUNDRED OF ADELAIDE

EASEMENTS

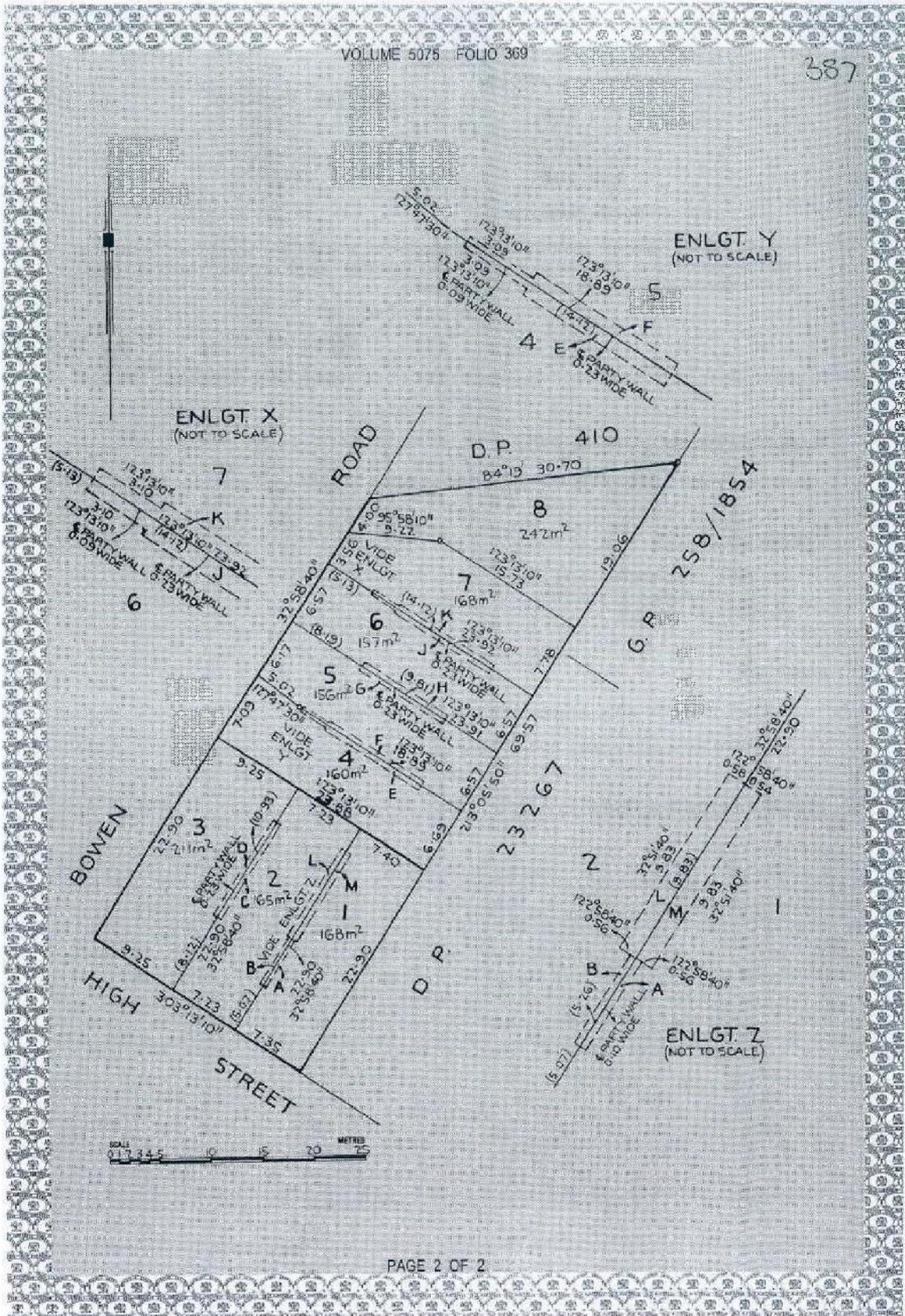
SUBJECT TO PARTY WALL RIGHTS OVER THE LAND MARKED D (RE 7276826)
TOGETHER WITH PARTY WALL RIGHTS OVER THE LAND MARKED C (RE 7276826)

SCHEDULE OF ENDORSEMENTS

NIL

End of Text

PAGE 1 OF 2



Reference: 155/674/2014
Enquiries To: Josh Edginton
Dir. Telephone: 8386 4575

7 November 2014

Ms AL Steed
13 High Street
KENSINGTON SA 5068

Dear Ms Steed

Development Application No:
Proposed Development:

Location of Proposed Development:
Property Identification:
5075/369

155/674/2014
Construction of an attached
verandah and new side fencing
(adjacent Bowen Street frontage)
13 High Street KENSINGTON 5068
Lot 3 DP 34217 Adelaide CT

Application for Development Approval

I wish to advise that the above mentioned application has been approved.

As required by Regulation 45 of the Development Regulations 1993, as owner of the land upon which the above mentioned development is proposed, please find attached a copy of the Decision Notification Form and other documents which have been forwarded to the applicant.

Should you require any further information or assistance, do not hesitate to contact me.

Yours sincerely



Josh Edginton
DEVELOPMENT OFFICER-BUILDING



City of
Norwood
Payneham
& St Peters

175 The Parade
Norwood SA 5067

PO Box 204
Kent Town SA 5071

Telephone
8368 4555

Facsimile
8382 6338

Email
townhall@npsp.sa.gov.au

Website
www.npsp.sa.gov.au



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Our Ref: ALS:ALSPersonal

24 October 2016

Minister for Planning
DPTI
GPO Box 1815,
ADELAIDE SA 5001

Attention: Robert Kleeman,
Unit Manager Strategic Development Assessment
Planning and Development, Development Division

By email: majordevadmin@sa.gov.au

Dear Sir/Madam,

Peregrine Mixed Use Development – 270 The Parade, Kensington

This submission is supplementary to my submissions lodged by email earlier today, 24 October 2016.

I refer to the 7.30 program run by ABC News **on 3 November 2015**. The report investigates alleged employment practices engaged in by “On the Run”, a substantial business arm of the Peregrine Corporation, Proponents of the Development at 207 The Parade, Kensington.

The report claims that a large number of the company’s employees were inappropriately employed on training wages, for the sole purpose of reducing wage costs to the On the Run businesses.

Based on claims made in the report I suggest that, conservatively, over the last 7 years the Peregrine Corporation may have “saved” up to \$45,000,000¹ (see spreadsheet of calculations on page 2) in wages and on costs and thereby affected the South Australian economy to up to that degree through these questionable practices.

I am not aware whether Peregrine also received State or Federal Government trainee incentive payments as part of this employment strategy. One presumes so.

The ABC’s report concludes with a statement that these practices are now the subject of investigation by “the Department”. Please advise which department of Government is investigating these claims and the status of such investigation.

¹ (see spreadsheet of calculations on page 3)

Of concern is the fact that these claims came to light some 3 weeks immediately prior to the Development Assessment Commission recommending to the Minister and the Minister granting approval for the Development to proceed as a Major Project.

I query to what extent the DAC investigated these public claims and/or took into consideration the Proponent's standing as fit and proper persons to undertake a Major Project for the benefit of the State.

Yours sincerely,



Abigail Steed

Email: as@msmlegal.com.au

Actual wages paid by On The Run per hour	normal adult wages low	Normal adult wages (level 1 with some loading)	Normal adult wages (level 3 with weekend loadings)	Saving to On The Run per employee hour	low	medium	high
\$15.30	\$20.00	\$30.00	\$35.00		\$4.70	\$14.70	\$19.70
Average hours per week	Weeks per year			savings per employee per year	low	medium	high
8	48				\$1,804.80	\$5,644.80	\$7,564.80
Plus superannuation payments saved @9%					\$162.43	\$508.03	\$680.83
plus payroll tax saved @5%					\$90.24	\$282.24	\$378.24
plus workcover levy @2%					\$36.10	\$112.90	\$151.30
					\$2,093.57	\$6,547.97	\$8,623.87
Conservative estimate of savings per training employee					\$2,093.57	\$6,547.97	\$8,623.87
Total of 2000 employees. Estimate 40% -60% on trainee arrangements					800	1000	1200
Savings to On the Run PER YEAR					\$1,674,854.40	\$6,547,968.00	\$10,348,646.40
Lost payroll and workcover contributions incurred by State Government PER YEAR					\$101,068.80	\$395,136.00	\$635,443.20
Lost income tax on reduced wages PER YEAR (calculated at 20-25%)					\$334,970.88	\$1,309,593.60	\$2,587,161.60

If calculated over the last 7 years of operation this equates to:

	low	medium	high
Savings to On The Run	\$11,723,980.80	\$45,835,776.00	\$72,440,524.80
Lost revenue to SA	\$707,481.60	\$2,765,952.00	\$4,448,102.40
Lost Tax revenue	\$2,344,796.16	\$9,167,155.20	\$18,110,131.20



SA's On The Run convenience store under investigation for traineeship wage loophole

7.30 By Alex Mann

Updated Tue 3 Nov 2015, 8:54pm

One of South Australia's biggest employers, the On The Run convenience store chain, is under investigation by the State Government following reports its traineeship program is a sham designed to keep wages low.

With more than 125 stores across the state and more than 2,000 employees, On The Run's 24-hour fast food, petrol and convenience store chain is one of South Australia's fastest growing businesses.

Every employee signs the company's promise: "We Never Close."

But in the wake of the wage underpayment scandal engulfing the country's 7-Eleven franchise operations, the company's business model has come under increasing scrutiny.

Former trainees and managers have spoken to the ABC's 7.30 program, many too afraid to speak out publicly.

Law student Chris Norman, 23, is one employee who decided to stand up.

He was required by On The Run to do a Certificate II in Automotive Sales, even though his job was at a Hungry Jacks based inside an On The Run petrol station.

Mr Norman said his job was so different to the training content that On The Run's human resources staff had to provide the answers.

As a trainee, he was paid just \$15.30 an hour.

"I didn't want to let them step on me, I wanted to stand up, 'cause it wasn't just happening to me, it was happening to everyone," Mr Norman said.

Do you know more about this story? Email 7.30syd@your.abc.net.au

Business using obscure sub-clause to pay trainee wages

Mr Norman sought the services of a lawyer, who wrote to On The Run requesting he be backpaid more than \$800 in lost wages.

That lawyer, Joseph Wearing, said Mr Norman should have been paid closer to \$19 an hour.

Through his correspondence with On The Run, Mr Wearing discovered the business used an obscure sub-clause in the Vehicle Manufacturing, Repair, Services and Retail Award 2010 to justify paying their trainees even less than the normal trainee wage because they were provided with "on the job" training.

"I mean the traineeship rate was already lower than the hourly adult rate," Mr Wearing said.

"But the on-job training rate was 20 per cent lower again."

Mr Norman said he received barely any training at all, and none of it was relevant to his job at Hungry Jacks.

PHOTO: On The Run's business model has come under increasing scrutiny following the 7-Eleven underpayment scandal. (Facebook: On The Run)

RELATED STORY: 7-Eleven staff work twice as long at half pay rate

RELATED STORY: Fair Work Ombudsman expects further court action against 7-Eleven

MAP: SA

Key points:

- Chris Norman says he was required to do an automotive traineeship to work at Hungry Jacks inside On The Run
- Trainee wages were \$15.30 an hour, compared to average adult wage of \$19
- Former manager say staff were also made to sign waiver for overtime wage loading
- On The Run maintains it has 'best traineeship program in Australia'

"We had a one-hour staff meeting once a month, where the HR manager came out and we got worksheets, these worksheets were related to automotive sales, so they didn't really have anything to do with Hungry Jacks," he said.

Mr Norman said he and his colleagues could not answer the questions, so were given the answers by a HR manager.

Mr Wearing said the conclusion to draw was that the training was used to reduce Mr Norman's pay rate.

"Because the training had nothing to do with the job that he was doing, it was only serving to justify the reduction in his rate of pay," he said.

Because the training had nothing to do with the job that he was doing, it was only serving to justify the reduction in his rate of pay.

Lawyer Joseph Wearing

Former manager says staff had to waive rights to overtime wages

Mr Norman eventually reached a confidential settlement with On The Run and is currently unemployed.

But it is not just the trainees who are impacted by the company's aggressive wage minimisation techniques.

One staff member, who asked not to be identified for fear of reprisal, worked as a manager for four years.

He said managers were required to sign away their rights to an overtime wage loading in a form attached to their contracts.

"The form was just handed to us as part of our contract, where you sign here, here, here and here," he said.

"And if you don't sign the last page, they're not going to offer you that contract."

Company maintains it has 'best traineeship program in Australia'

Complaints by former On The Run staff were so widespread that a Boycott On The Run Facebook page attracted almost 2,000 likes before it was removed four weeks ago.

The posts on that page were similar to the stories told to 7.30 by many current and former trainees and managers.

On The Run has declined to comment.

However, the company has previously said it runs the "best traineeship program in Australia", and that everything they do is "fair and legal".

Mr Wearing said On The Run's traineeship program calls into question the government body charged with policing these traineeship arrangements.

"There needs to be a proper oversight of these training arrangements to ensure that training is being provided, that the training is relevant to the job that's being performed in all cases," he said.

SA Skills Minister Gail Gago has confirmed her department is investigating On The Run's traineeship program, but the Minister herself declined to be interviewed.

Topic: retail, work, education, community-and-society, sa

First posted Tue 3 Nov 2015, 6:31pm

Minister of Planning

Attention Robert Kleeman

Unit Manager, Strategic Development Assessment Planning and Development
Department of Planning, Development and Infrastructure

Dear Sir

Submission re Peregrine Corporation Mixed Use Development Report

I am a resident of Bowen Street and wish to submit the following points of concern in respect of the abovementioned Development Report.

Please note that page numbers referred to are the page numbers of the two PDF documents provided as the Development Report e.g. "page 39 of PDF2" refers to page 39 of the second of the PDF's titled Final Development Report:

1. Noise, Car Parking, Headlights, Reversing Lights, Internal and External Lighting and impact of all hours, all days 24/7 operation

Current situation

Noise for residents of Bowen Street currently does not affect the amenity of our lives. I considered the noise effect very carefully before buying my property and, as I had hoped, traffic noise is of a consistent, non-modulated effect which is reduced and dulled substantially by the effect of having the existing large Peregrine building as a noise barrier between us, Portrush Road and the intersection of Portrush Road with Norwood Parade.

Traffic and ambient noise is consistent, non-modulated and sounds quite distant without having any instantaneous noise impact.

Traffic movement in Bowen Street does not affect me much because:

1. There is very little after-hours or weekend traffic;
2. There are only 13 parallel car parks on Bowen Street, all of which are untimed, so there is limited stopping and starting as the parks are generally occupied for lengthy periods during the working day (and little used after hours);
3. The street is not a destination for the general public and it is not a short cut or thoroughfare to anywhere else. Consequently, traffic is principally for staff using the current 25 space carpark on the Peregrine property, their delivery vehicles and the few residents; and
4. Traffic on Bowen Street during working hours travels past at a slow speed (without generally stopping and starting because parking is fully occupied on a long term basis) mostly intending to park in the On The Run car park at the Norwood Parade end of the street.

Noise from Bowen Street is principally only from slow moving, non-stopping traffic (as parking is on an untimed basis, cars park for lengthy periods of time) with minimal after-hours or weekend traffic.

Currently, Bowen Street is a very pleasant, quiet, amenable and attractive street to reside on.

Proposed situation

The proposal would change all of the above and very much impact on the amenity of our residences. Page 39 of PDF2 shows **projected traffic generation of 3,570 trips per day, all passing my property on Bowen Street, either through an open car park or directly on Bowen Street, and parking close to my residence on a 24/7 basis.** This projection uses independent sources but these sources are not based on 24/7 hours trading.

Given that the already operating On The Run outlets are on a 24/7 basis, and that some of the proposed facilities are already to be on a 24/7 basis, it is realistic to assume that the cafe and retail areas will, at some time, also trade on a 24/7 basis so that the above projections, which do not include 24/7 trading, would be increased.

Principal damaging impacts are caused by:

1. Car park noise and lighting

Three levels of car parking fully open to Bowen Street residents and with little noise or lighting barriers in between

The Proposal includes three levels of largely unenclosed car parking fully open to Bowen Street residents with little wall or sound barrier in between. These three floors will be open to the public on all days and all of the time thus creating noise and lighting intrusions on our lives on a 24/7 basis, and particularly on our sleep.

The proposed vertical fins and landscaping will have minimal impact in reducing the noise, headlight and reversing light intrusion and internal carpark lighting which will be imposed on Bowen Street residents.

It is noted that the top two floors will apparently have some form of wall at the bottom (although there will be none on the ground floor) and a portion of the car park ceilings will have some acoustic material added, but these items, although most welcome, will not satisfactorily resolve the impact from noise, headlight, reversing light and area lighting (both internal and external);

It is also noted that the steel mesh trellis with climbers proposed for the bottom two levels of the car park may provide some limited, although inadequate, assistance in reduction of lighting and headlight intrusion (although none in reducing noise). It is proposed though that trellis is not to be installed on the second floor of the car park (page 12 of Part 2).

Noise from the open three level car park which is very close to my two level residence will include:

1. squealing of tyres, particularly as happens when cars drive around corners, which will occur when travelling between floors;
2. Sound systems and radios;
3. People holding discussions and/or arguments late at night, sometimes in an intoxicated state;
4. Car doors closing and sometimes slamming;
5. Cars reversing and engines starting;
6. Occasional poor behaviour as occurs near entertainment providers; and

7. General inconsiderate behaviour which is magnified by the large number of people that will frequent the open carpark and our street on a 24/7 basis.

There will be noise with dominant characteristics of modulation, impulsiveness, instantaneousness and tone at various times on a 24/7 basis.

Lighting both direct and indirect (including headlights and reversing lights) on a 24/7 basis

There will be illumination:

1. From internal lighting throughout the three floors of car parking on an all night, all day basis;
2. From external lighting on the street on an all night basis;
3. From headlights and reversing lights (directly from the car park and also from Bowen Street, as detailed below) affecting our sleep. **The headlights of cars parking facing us in the carpark and of the reversing lights of cars reversing in the three above ground floors of carpark and in the proposed changes to Bowen Street parking, as detailed below, will shine directly into our bedrooms and living areas.**

This will be very detrimental to our sleep and well being.

The impact of the unenclosed, open car park (and, particularly, its after-hours impact) will very adversely affect Bowen Street's currently eminently liveable location. It will make living there quite difficult and not of a reasonable amenity.

Changing to angled, untimed parking in Bowen Street (as detailed below) would considerably exacerbate these issues.

Eighteen angled and timed car parks in Bowen Street for 24/7 businesses

As per the fourth page of the MPH Design Statement (page 5 of Part 2), the developers propose to hold "*discussions with the Norwood and St Peters Council about the opportunity (to) create a better public realm to Bowen Street through a better traffic management strategy of parallel parking*". This proposal includes replacing the current 13 parallel untimed car parks in Bowen Street with approximately 18 angled and timed car parks (page 17 of PDF 2).

This would considerably exacerbate the issues noted above because:

1. Cars would stop and start (with consequent noise as detailed above) in each car park space many times per day (rather than occasionally, as currently occurs);
 2. Angled parking would mean that reversing and tail lights would shine into my residence at night (on a 24/7 basis).
2. **Mechanical noise from the unenclosed rooftop machinery which is approximately 40 metres from my bedrooms and living areas**

Page 177 of PDF2 recommends that a **detailed assessment of mechanical noise from the rooftop machinery** is carried out but the Proposal doesn't include any such assessment. As the proposed plant is assessed as being very noisy (exceeding 100 db(A)) and is only approximately 40 metres from my bedrooms and living areas, this machinery should be fully enclosed and have sufficient acoustic and other treatment to reduce this noise to non-intrusive levels.

3. **Noise from external areas on the upper floors**

The proposal includes substantial outside recreation areas, a swimming pool and a walking track located above our heads for use by the hundreds of people using the building on a daily basis. There is also a late opening restaurant and seven accommodation units. The potential for noise from these areas needs to be further addressed.

2. 24/7 Trading affects the amenity of our residency on an ongoing basis

24/7 parking and lighting (both internal and external) is proposed next to Bowen Street residents to allow operation of 24/7 Cafes, Retail Outlets, Restaurant, a 350 seat Theatre and 465 square metre Meeting Area, Fitness Centre, Swimming Pool and Accommodation

The On The Run group specialise in all hours, all days 24/7 trading so it is realistic to assume that, either now or at some time in the building's existence, the proposal will introduce noise and lighting to the residents' lives on a 24/7 basis. Even the existing proposal will have:

1. Two cafe and retail outlets with obvious potential to trade on an all hours 24/7 basis;
2. a restaurant opening until 2AM with staff leaving sometime later. These premises have potential to be used as a nightclub or Bar which would result in considerably greater numbers of daily customers and volume of music;
3. a **350 seat** theatre (**and adjacent 465 sq metre meeting area**) which could be quite readily used by the company and also by lease as an entertainment venue, a function centre, a conference business and other varied uses (including after-hours use) and which participants will **access from the top two levels of the carpark**. Given that all attendees would arrive for the same session and that, where they are all external Peregrine employees, they are likely to arrive as individuals, this could result in a lot of vehicle traffic;
4. a 24/7 fitness centre and swimming pool;
5. a walking track around the circumference of the building and various balconies, decks and outside recreation areas (largely on a 24/7 basis); and
6. a 24/7 seven unit accommodation facility (able to be used as a motel, B & B etc.).

As noted above, Page 39 of PDF2 shows **projected traffic generation of 3,570 trips per day, all passing my property on Bowen Street, either through an open car park or directly**. This could well be significantly understated, given the short duration of visits to established On The Run businesses and, as noted above, that these projections are not based on 24/7 businesses.

3. Overshadowing commencing at approximately a few minutes after midday in Winter

The Solar Diagrams at pages 165 and 166 of PDF 2 indicate that the front windows of the units on Bowen Street (with the whole building following shortly thereafter) will be cut out the sun from approximately:

1. A few minutes after midday in Winter;
2. About 1.45pm in Spring
3. About 3.15pm in Summer; and
4. About 2.30pm in Autumn.

On page 3 of the Part 2 PDF, the MPH Design Statement states that *"The effect is that the neighbouring properties are only to be overshadowed by the built form from 3pm on the autumn equinox through winter's solstice's to the spring equinox"* but the Solar Diagrams referred to above show that this is incorrect.

To be reduced to so few hours of sunlight does not seem either acceptable or fair and certainly not in accordance with sound planning Principles.

A portion of this loss of amenity is due to the proposal being for eight floors plus roof top machinery combined with the generous ceiling heights of the floors.

4. **Visual Impact on Bowen Street of being fronted by three stories of car parking**

The building would create a non-appealing visual effect from our properties of a three storey slab of car park (topped by five other floors and rooftop machinery) emanating movement, noise and lighting on a 24/7 basis.

5. **Overlooking**

I couldn't find any mention of the height and opaqueness of the balcony and deck balustrades facing Bowen Street in the Report. **Sufficient height and opaqueness** needs to be incorporated to eliminate overlooking into our properties.

There proposal includes construction of a walking track around the circumference of the building whereas there already are many safe residential streets in place for walking in Kensington.

Partial solutions

1. Having a **solid noise-proof wall for the car park floors fronting onto Bowen Street. This is the most important and effective solution;**
2. Developing a second basement level;
3. Fully utilising the two basement levels for parking;
4. Leaving Bowen Street car parking as parallel, long term parking and not changing it to angled, timed parking; and
5. Removing the various additional functions that have been added to the building that are in excess of, and unnecessary for, its role of providing accommodation for the company's employees and which appear to be just too extensive for the limited size of the land.

Hon. John Rau MP
 Minister for Planning
 c/- Mr Robert Kleeman
 Unit Manager, Strategic Development Assessment
 Department of Planning, Transport and Infrastructure
 GPO Box 1815
 Adelaide SA 5000

Rev Kerry and Rob Pierce
 Clayton Wesley Uniting Church
 PO Box 111
 Brighton SA 5048
 PierceRK@gmail.com
 23 Oct 2016

Dear Minister

Re: Peregrine Mixed Use Development, 270 The Parade, Kensington

As members of the Clayton Wesley Uniting Church community, we wish to convey our concerns regarding the proposed development by Perergine Corporation/Shahin Brothers Pty Ltd at 270 The Parade, Kensington.

Our concerns relate to the size and location of the proposal. The imposing size of the proposed building will have a large visual and physical impact at this significant road intersection and will adversely affect at least three State Heritage places at this location, especially the Clayton Wesley Uniting Church Complex.

The view eastwards along The Parade is quite unique in Adelaide as it features the towers or spires of three buildings – Norwood Town Hall, Norwood Wesley Church and Clayton Congregational Church (to give them their original names) - viewed against the sky and the Hills Face Zone of the Adelaide Hills. This view is illustrated in the Heritage Assessment Report. As the report states, this is 'a historic visual character' of the area. The current views of the church from both the west and north will be destroyed by the size (and height) of the proposed development.

The report correctly states that '*of the State Heritage places, Clayton Wesley Church is most likely to be materially impacted by the proposed development, due to its proximity to the site, and current visual dominance.*' Clayton Wesley is one of Adelaide's finest church buildings, a highly significant example of Gothic Revival architecture and is one of less than half a dozen churches in Adelaide with a tall spire. We disagree with the Heritage Assessment Report's summary that the proposed building will be '*a building that reinforces the intersection, while nonetheless sitting compatibly with the adjacent State Heritage place*'. The architectural impact of the church will be seriously compromised by the proposed development.

It is of concern that the proposed building will exceed the maximum height envisaged for the Kensington area. If this development is approved at seven floors it will open the way for other such developments in this largely residential suburb.

In summary, we consider that the proposed development is inappropriate for this site, a significant intersection which has four State Heritage places and various Local Heritage places nearby and is the focal point of the impressive vista eastward along The Parade. We consider that the full impact on the architectural stance of Clayton Wesley Uniting Church property has not been properly assessed.

Yours faithfully

21 October 2016

Minister for Planning
Department of Planning Transport and Infrastructure
GPO Box 1815,
ADELAIDE SA 5001

Attention:

Robert Kleeman, Unit Manager Strategic Development Assessment
Planning and Development, Development Division

By e-mail: majordevadmin@sa.gov.au

Submissions regarding the development 270 The Parade, Kensington

Dear Sir,

Please register my objection to this Development.

My specific objections are set out below however, do not comprise all my concerns.

Since the Development Report is in excess of 350 pages in length; and much of its content is of a technical nature my view is, that a consultation period of 15 business days is far too short.

The above factors limit any person concerned to assess all the information's presented in the "tower of words" and makes it even more impossible for most people like me to addresses all the issues in detail.

1. Principal areas of concern, are:
 - 1.1 Visual impact
 - 1.2 Overshadowing
 - 1.3 Loss of amenity in the suburb
 - 1.4 Parking issues
 - 1.5 Residential Historic (Conservation) Zone interface
 - 1.6 Comparison with other Developments
- 2 Traffic Management Issues
3. Devaluation of properties in the surrounding areas and further afield, including my property

I have no objection to information contained in this Submission being made public

Please notify me of the issue of the Response Document and/or provided me with a copy of that document.

1.1 Visual impact

- 1.1.1 The height and bulk of the development are both extraordinary. Although classified as 7 storeys, its total height is more than **38m**. Consequently the 7 storeys story is misleading because the actual height represents more than 10 storeys.
- 1.1.2 The suggestion that the visual amenity of Bowen Street residents will not be affected because they are already looking onto a one storey brick wall of a commercial building is not true and simply insulting to all concerned residents. The current building doesn't block out the skyline as the proposed building would do.
- 1.1.3 In my view, the suggestion to erect such enormous structure directly adjacent to a long established residential area alone indicates a great deal of ignorance and this makes people angry and distressed.
- 1.1.4 Even a building less than half the height and size in this location is not appropriate for the character of Kensington and all surrounding suburbs.

1.2 Overshadowing

- 1.2.1 The overshadowing effect is directly related to the unprecedented height of the proposed structure.
- 1.2.2 Surprisingly the overshadowing projections have been prepared only up until 3pm in each seasonal period.
- 1.2.3 The proposal does not give any consideration to loss of direct sunshine and light after that time, apart from the belief that setbacks of the upper floor will fix this.
- 1.2.4 There should be great concern with this belief because there is no credible proof of this whole issue in relation to all effected properties.
- 1.2.5 The uninterrupted views and plenty of daylight filling the office accommodations are hailed as providing a flexible and pleasant working environment that largely comes at the expense of surrounding residents.

1.3 Loss of amenity in the suburb

- 1.3.1 When my wife and I purchased the Property (15 High St.) it was our understanding that the Kensington area was zoned Residential Historic (Conservation) and I believe that is still the case.
- 1.3.2 At the time the property at 270 The Parade was a commercial building and occupied by a government department. There was the possibility that the site could be developed within the frame work of the applicable zoning in the future. Maybe an additional storey added at some stage. Most of the building is single storey.
- 1.3.3 I believe restrictions in the Development Plan against developments in a Business Zone abutting a Residential Zone, would prevent any such development from improperly impacting on the amenity of neighbouring

areas. I regarded this as a protection against any multi story building (more than 3 storeys) being constructed on that site.

- 1.3.4 As self-funded retirees, we have spent a great amount of money on improvements to provide us with an income stream and a healthy capital gain. The decision to invest was also influenced by the existing planning conditions in the area.
- 1.3.5 I am convinced, that the size and scale of the current Development proposal, if it goes ahead, will reduce the income and the value of the property I have to rely on, considerably.

1.4 Parking issues

- 1.4.1 Apparently there are 3 levels which have been noted in the Development Application which may be utilised as office space in the future. However, there is no indication where to find the more than 200 parking spaces taken from these levels and where the extra staff can park their cars. In the beginning staffing is planned at about 250 increasing to about 430.

Car parking provision is approximately only 300 in this proposal.

1.5 Residential Historic (Conservation) Zone interface

The Development Report lists various issues referring to residential properties neighbouring the proposed development.

- 1.5.1 Page 21: Bowen Street and High Street have very limited historic character.
- 1.5.2 Page 22: While the proposed development is notably (extremely) taller than that across High Street, it is considered to have negligible impacts on the amenity and character of this interface as..
- 1.5.4 Page 22: The current residential and historic character of High Street along this frontage is low/poor"
- 1.5.5 And later: Bowen Street also has limited residential character, with just under half of the eastern side accommodating residential use (with the remainder being commercial), while the western side accommodates no residential use".

It appears that these comments address only the "historic (conservation)" part of the zoning reference and not the "residential" character of the suburb generally and High/ Bowen Streets in particular.

The fact that there are only a small number of residences directly adjacent to the Development site does not change the fact that there are residences which will be badly

affected and the reality is that the residents to be affected should expect protection from such effects under the existing Development Plan.

The truth is, the "residential character" of much of the suburb of Kensington will be impacted in one way or another.

However, most importantly there are humans, families and children living there and sad to say: "the DR doesn't give any consideration to them".

1.6 Comparison with other Developments

1.6.1 Page 23:

Thorough consideration has been given to the surrounding environments by the design team...

The following elements have been taken into consideration during the design process:

1.6.1.1 The residential uses adjoining the subject land, particularly along Bowen Street; and

1.6.1.2 Previous and proposed Development Plan policy changes within the broader locality which may lead to future high rise development being established along the Parade

How thorough is a consideration that states that a one storey building has the same impact on residents living in the abutting houses as the 38m high proposed development will have?

There is only a reference to policy changes and high-rise developments related specifically to the Nuova Apartments development on the Parade.

There are other references to the Nuova development to be found in the DR.

It must be of concern to any person confronted with the DR, that a number of these references seem to suggest a link between that development and the Peregrine proposal including as to:

Height equivalency;

Location of a high-rise development within an historical/residential setting.

Draping around an existing historical building

Unfortunately these statements are misleading and apparently the opportunity was missed to get thorough information on site.

Any implication that there are developments nearby which are equivalent in size or impact or suggestions that the prior approval of such building justifies the automatic approval of the other, is absurd.

2 Traffic Management Issues

- 2.1 I understand that the development is designed to address the Bowen Street day time deliveries by truck using that street to access a warehouse.
- 2.2 A second stage proposal is to allow two way access to the street at the northern end. This appears sensible but will have the opposite effect of increased traffic along Bowen St. because this will provide a short cut to Portrush Rd. and this will be used.
- 2.3 Concern too lies with the 3 level parking and the proposed single entry point off High Street very close to Port Rush Road. It may alleviate some issues however, the concentration of all this traffic at the narrow entrance to the car park; and in addition the increased staffing in the new building, I estimate will increase traffic to and from the site by up to 30%.
- 2.4 This estimate does not take into account the issue of the future conversion of car park space.
- 2.5 Without any doubt there will also be plenty of cars accessing the car park from the west down High Street. Especially between 8am-9am the peak period which corresponds with the school drop off period at Mary Mackillop College and must be of great concern.
- 2.6 Figures are provided early in the report for this period but later assessments seem to largely ignore these figures.
- 2.7 The risk of traffic queuing across the Parade / Portrush Rd. intersection appears highly subjective in the DR, and will be greater than disclosed in the proposal. Because almost all employee traffic will be focussed at the High Street entrance no matter where they come from rather than being dispersed to different access points.
- 2.8 Not to forget the increased number of employees including tenant employees. Most of whom will arrive by single vehicle. A fact thoroughly not taken into account in the projections.
- 2.9 There will be a solid increase in traffic to the site by car. Causing dangerous queuing of traffic back along High Street and along Portrush Rd.

3. Devaluation of properties in the surrounding areas and further afield, including my property.

- 3.1 It is safe to say that each of the above concerns will have a significant devaluing effect on my Property, whether that is in terms of resale value or as a rental property.
- 3.2 The same effect must be expect to all residential properties that fall within the shadow outline of the Development and potentially beyond.

Closing note:

I know the government is desperate to have projects like this going on, as the overall situation in South Australia at this time is a concern. I may add, not of its own making.

However, having outlined my views above I urge the planning authority objectively to reject the proposed development on the basis, that the present location is not suitable for such a massive building. And further for the sake of all the effected Residents of Kensington and for the sake of the mainly residential suburb of Kensington.

Yours Sincerely



Doris Priebe

Co-owner of 15 High St. Kensington

dorisipriebe@gmail.com 045 85 89 759

Zuidland, Sara (DPTI)

From: The Goodies <thegoodies@internode.on.net>
Sent: Monday, 24 October 2016 4:20 PM
To: DPTI:PD DAC & Major Developments Panel
Subject: Public consultation - Major Project - 270 The Parade, Kensington (Peregrine Head Office Redevelopment)

Daniel Goodwin

55 High Street Kensington

SA 5068

24th October 2016

majordevadmin@sa.gov.au

RE: Major Project - 270 The Parade, Kensington (Peregrine Head Office Redevelopment)

I wish to make comment with regard to the Major development proposal for **270 The Parade, Kensington (Peregrine Head Office Redevelopment)** to be taken into account when assessing the proposal.

In principal, I am supportive of development at the site of **270 The Parade, Kensington.**

Having reviewed the reports and plans, I believe the proposal addresses some of the critical issues already affecting the immediate and surrounding locality. Key benefits include:

- The extensive paved forecourt and colonnades, which will improve and encourage pedestrian movement in the area.
- Road widening of 4.5m to facilitate improved vehicular movement and provision for future tram infrastructure. Traffic flow east of Portrush Road is exceptionally poor due to single lane traffic caused by on street parking and insufficient clearway duration. The clearway times do not accommodate the prolonged duration of increased traffic which results from the high concentration of schools in the area (peak until 10am and from 3pm).

Furthermore, I believe steps to reduce the demand for on-street parking are much needed. As a resident near Bridge Street Kensington, I frequently see Peregrine staff parking their vehicles near or in front of my house (3 blocks from the proposed site). This does however highlight the existing inadequate ratio of staff to on-site car parking spaces (I estimate there to be approximately 50 spaces on site at present). The development needs to ensure the relative tenantable area (m2) to parking spaces provided are greatly increased. I do question the adequacy of a five fold increase in off-street parks relative to an increase from single storey to eight storey building – especially as there is no capacity for an increased on-street parking for Peregrine staff and visitors.

The anxiety regarding car parking is in no way alleviated by the designers intentional steps to enable future conversion of above ground parking (up to 8615m2) in to tenantable space – further compounding the parking issues for the Kensington area and surrounds.

In the development report it is stated that (amongst other things) the key objectives are to:

- establish a landmark building at a visually prominent site, and
- offer a better work environment for a growing number of staff.

The Parade / Portrush Road intersection already has multiple historic landmark buildings on the other three corners, most notably the Clayton Wesley Uniting Church. A more conspicuous design would enhance, rather than overwhelm the historic nature of these landmarks.

Undoubtedly, no single aesthetic will please all members of the public. I enjoy some elements of the starwars-esque design of the structure, however it is the scale I wish to object to, in particular the visual impact of the proposed height.

The notion that the height of the development at 258-262 The Parade sets a precedent is incorrect. 258 The Parade and other (principally residential) developments are aligned with the state government 2030 plan. More importantly, they do not sit with in Kensington a genuinely unique historic area established around 180 years ago (as opposed to Peregrine's ten years at the site).

It is suggested the development is to facilitate the growing company, however much of the increase in bulk and scale results from a change in use through the addition of retail, restaurant and gymnasium facilities (at least two additional storeys + additional car parking spaces). This is surplus to requirement, as retail and restaurants are already in abundance along The Parade, and there are multiple gymnasiums and three public swimming pools in relative proximity (2 pools within around 500 metres).

I believe the location of parking above the ground floor will result in is unnecessary building height. Instead, car parking should be at ground level and multiple below ground levels (such as the Myer centre in the CBD)

Ignoring the issue of height, design considerations such as the podium base of the building scaled to the neighbouring corners is welcomed, providing they are consistent with (and not exceeding) the height of the main ridge cap of the Wesley Church building.

I do not believe that a scaling down of this project will negatively impact the Peregrine group. The group have substantial commercial property holdings in SA, which they no doubt will relocate to during the redevelopment phase of the proposed site. Given the phenomenal success of the Peregrine group, it seems peculiar that they push the envelope for this small site, knowing that a "Peregrine tower" located in the CBD will more accurately reflect the trajectory of this company.

In summary, I believe the site welcomes redevelopment, just not the current proposal as it stands. Therefore, I believe it should be rejected in its current form. However, a reduction in height through thoughtful redesign and increased car parking capacity could be supported, providing the positive virtues of the existing design are maintained.

A decision and commencement on tramline infrastructure along The Parade prior to construction of any proposal for the site would help alleviate the fears of rate payers and local tax payers, and mitigate some of the exacerbation of traffic issues around the site that will unavoidably result from the construction phase of a redevelopment.

Sincerely

Daniel Goodwin

21 October 2016

Minister for Planning
Department of Planning Transport and Infrastructure
GPO Box 1815,
ADELAIDE SA 5001

Attention:

Robert Kleeman, Unit Manager Strategic Development Assessment
Planning and Development, Development Division

By e-mail: majordevadmin@sa.gov.au

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- 1.3.5 I am convinced, that the size and scale of the current Development proposal, if it goes ahead, will reduce the income and the value of the property I have to rely on, considerably.

1.4 Parking issues

- 1.4.1 Apparently there are 3 levels which have been noted in the Development Application which may be utilised as office space in the future. However, there is no indication where to find the more than 200 parking spaces taken from these levels and where the extra staff can park their cars. In the beginning staffing is planned at about 250 increasing to about 430.

Car parking provision is approximately only 300 in this proposal.

1.5 Residential Historic (Conservation) Zone interface

The Development Report lists various issues referring to residential properties neighbouring the proposed development.

- 1.5.1 Page 21: Bowen Street and High Street have very limited historic character.
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It appears that these comments address only the "historic (conservation)" part of the zoning reference and not the "residential" character of the suburb generally and High/ Bowen Streets in particular.

The fact that there are only a small number of residences directly adjacent to the Development site does not change the fact that there are residences which will be badly

affected and the reality is that the residents to be affected should expect protection from such effects under the existing Development Plan.

The truth is, the "residential character" of much of the suburb of Kensington will be impacted in one way or another.

However, most importantly there are humans, families and children living there and sad to say: "the DR doesn't give any consideration to them".

1.6 Comparison with other Developments

1.6.1 Page 23:

Thorough consideration has been given to the surrounding environments by the design team...

The following elements have been taken into consideration during the design process:

1.6.1.1 The residential uses adjoining the subject land, particularly along Bowen Street; and

1.6.1.2 Previous and proposed Development Plan policy changes within the broader locality which may lead to future high rise development being established along the Parade

How thorough is a consideration that states that a one storey building has the same impact on residents living in the abutting houses as the 38m high proposed development will have?

There is only a reference to policy changes and high-rise developments related specifically to the Nuova Apartments development on the Parade.

There are other references to the Nuova development to be found in the DR.

It must be of concern to any person confronted with the DR, that a number of these references seem to suggest a link between that development and the Peregrine proposal including as to:

Height equivalency;

Location of a high-rise development within an historical/residential setting.

Draping around an existing historical building

Unfortunately these statements are misleading and apparently the opportunity was missed to get thorough information on site.

Any implication that there are developments nearby which are equivalent in size or impact or suggestions that the prior approval of such building justifies the automatic approval of the other, is absurd.

2 Traffic Management Issues

- 2.1 I understand that the development is designed to address the Bowen Street day time deliveries by truck using that street to access a warehouse.
- 2.2 A second stage proposal is to allow two way access to the street at the northern end. This appears sensible but will have the opposite effect of increased traffic along Bowen St. because this will provide a short cut to Portrush Rd. and this will be used.
- 2.3 Concern too lies with the 3 level parking and the proposed single entry point off High Street very close to Port Rush Road. It may alleviate some issues however, the concentration of all this traffic at the narrow entrance to the car park; and in addition the increased staffing in the new building, I estimate will increase traffic to and from the site by up to 30%.
- 2.4 This estimate does not take into account the issue of the future conversion of car park space.
- 2.5 Without any doubt there will also be plenty of cars accessing the car park from the west down High Street. Especially between 8am-9am the peak period which corresponds with the school drop off period at Mary Mackillop College and must be of great concern.
- 2.6 Figures are provided early in the report for this period but later assessments seem to largely ignore these figures.
- 2.7 The risk of traffic queuing across the Parade / Portrush Rd. intersection appears highly subjective in the DR, and will be greater than disclosed in the proposal. Because almost all employee traffic will be focussed at the High Street entrance no matter where they come from rather than being dispersed to different access points.
- 2.8 Not to forget the increased number of employees including tenant employees. Most of whom will arrive by single vehicle. A fact thoroughly not taken into account in the projections.
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3. Devaluation of properties in the surrounding areas and further afield, including my property.

- 3.1 It is safe to say that each of the above concerns will have a significant devaluing effect on my Property, whether that is in terms of resale value or as a rental property.
- 3.2 The same effect must be expect to all residential properties that fall within the shadow outline of the Development and potentially beyond.

Closing note:

The owners of the site, the Shahin family, one of the most successful entrepreneurs in Australia stated: "they wish to create a building which would make a lasting statement and, to that end, were sparing no expense".

As a hardworking family with inspiration, strong values and strategies that made them influential and powerful they not only have the right to build themselves a lasting monument, in my view they deserve it.

Although the question remains why fulfilling their wish means choosing to put an "Elephant" in other people backyard?

Looking at this admirable, successful family who have the means to buy any property they want in Australia, in Adelaide's CBD, Glenelg or elsewhere but choose their current office address 270 The Parade, Kensington, one must ask what is the gain?

Whatever benefit will be reaped, this action is shattering the dreams of other hard working families and residents who live adjacent to the proposed site or further afield in the residential suburb of Kensington.

There is no or little advantage for Kensington or to the now well established and beloved boulevard The Parade. The opposite may be the case in the long run.

Since 1984 enormous efforts and good planning decisions made by the then Norwood Council have transformed this area into Adelaide's most famous and desired shopping and Brasserie Street.

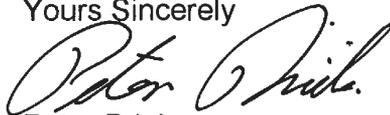
Sustained Progress, (and I am sure the Shahin family understand this term far better than I do), is of a different kind. Namely working together and not against each other.

Whatever the final outcome in this matter I wish the Shahin family all the best by furthering their success which I believe is, in principle, of great benefit to South Australia and its citizens.

I know the government is desperate to have projects like this going on, as the overall situation in South Australia at this time is a concern. I may add; not of its own making.

However, having outlined my views above I urge the planning authority objectively to reject the proposed development on the basis, that the present location is not suitable for such a massive building. And further for the sake of all the effected Residents of Kensington and for the sake of the mainly residential suburb of Kensington.

Yours Sincerely



Peter Priebe

Co-owner of 15 High St. Kensington

ppriebe2@gmail.com . 040 79 69 0 69

P.S. as a suggestion:

Please have a look at land situated 26 Briens Rd.
Northfield SA 5085 (Rollform)
I guarantee, whoever is in charge will love it.

21 October 2016

Minister for Planning
Department of Planning Transport and Infrastructure
GPO Box 1815,
ADELAIDE SA 5001

Attention:

Robert Kleeman, Unit Manager Strategic Development Assessment
Planning and Development, Development Division

By e-mail: majordevadmin@sa.gov.au

Submissions regarding the development 270 The Parade, Kensington

Dear Sir,

Please register my objection to this Development.

My specific objections are set out below however, do not comprise all my concerns.

Since the Development Report is in excess of 350 pages in length; and much of its content is of a technical nature my view is, that a consultation period of 15 business days is far too short.

The above factors limit any person concerned to assess all the information's presented in the "tower of words" and makes it even more impossible for most people like me to addresses all the issues in detail.

1. Principal areas of concern, are:
 - 1.1 Visual impact
 - 1.2 Overshadowing
 - 1.3 Loss of amenity in the suburb
 - 1.4 Parking issues
 - 1.5 Residential Historic (Conservation) Zone interface
 - 1.6 Comparison with other Developments
- 2 Traffic Management Issues
3. Devaluation of properties in the surrounding areas and further afield, including my property

I have no objection to information contained in this Submission being made public

Please notify me of the issue of the Response Document and/or provided me with a copy of that document.

1.1 Visual impact

- 1.1.1 The height and bulk of the development are both extraordinary. Although classified as 7 storeys, its total height is more than **38m**. Consequently the 7 storeys story is misleading because the actual height represents more than 10 storeys.
- 1.1.2 The suggestion that the visual amenity of Bowen Street residents will not be affected because they are already looking onto a one storey brick wall of a commercial building is not true and simply insulting to all concerned residents. The current building doesn't block out the skyline as the proposed building would do.
- 1.1.3 In my view, the suggestion to erect such enormous structure directly adjacent to a long established residential area alone indicates a great deal of ignorance and this makes people angry and distressed.
- 1.1.4 Even a building less than half the height and size in this location is not appropriate for the character of Kensington and all surrounding suburbs.

1.2 Overshadowing

- 1.2.1 The overshadowing effect is directly related to the unprecedented height of the proposed structure.
- 1.2.2 Surprisingly the overshadowing projections have been prepared only up until 3pm in each seasonal period.
- 1.2.3 The proposal does not give any consideration to loss of direct sunshine and light after that time, apart from the belief that setbacks of the upper floor will fix this.
- 1.2.4 There should be great concern with this belief because there is no credible proof of this whole issue in relation to all effected properties.
- 1.2.5 The uninterrupted views and plenty of daylight filling the office accommodations are hailed as providing a flexible and pleasant working environment that largely comes at the expense of surrounding residents.

1.3 Loss of amenity in the suburb

- 1.3.1 When my wife and I purchased the Property (15 High St.) it was our understanding that the Kensington area was zoned Residential Historic (Conservation) and I believe that is still the case.
- 1.3.2 At the time the property at 270 The Parade was a commercial building and occupied by a government department. There was the possibility that the site could be developed within the frame work of the applicable zoning in the future. Maybe an additional storey added at some stage. Most of the building is single storey.
- 1.3.3 I believe restrictions in the Development Plan against developments in a Business Zone abutting a Residential Zone, would prevent any such development from improperly impacting on the amenity of neighbouring

areas. I regarded this as a protection against any multi story building (more than 3 storeys) being constructed on that site.

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Car parking provision is approximately only 300 in this proposal.

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Yours Sincerely

Eric Priebe

16 Edinburgh Ave, Stonyfell SA 5066

jetclean@gmail.com 041 25 23 7 42



CLAYTON WESLEY UNITING CHURCH

Hon. John Rau MP
Minister for Planning
c/- Mr Robert Kleeman
Unit Manager, Strategic Development Assessment
Department of Planning, Transport and Infrastructure
GPO Box 1815
Adelaide SA 5000

SL. Keber.

16 October 2016

Dear Minister

Re: Peregrine Mixed Use Development, 270 The Parade, Kensington

The Parish Mission Council of Clayton Wesley Uniting Church has reviewed the documents regarding the proposed development by Perergine Corporation/Shahin Brothers Pty Ltd at 270 The Parade, Kensington.

Whilst we can see merit (mainly financial) in the proposed development and commend the applicants for the generally very thorough content of their proposal we do have significant concerns regarding the scale and location of this proposal. Our concerns as expressed in our submission relate to some specific matters and do not touch on other issues such as traffic, shading of nearby buildings and so on, which others will probably raise.

Our main concerns are:

- The imposing size of the proposed building and its impact (visual and physical) at this significant intersection.
- The impact on three State Heritage places (buildings) at this location, especially the Clayton Wesley Uniting Church Complex.
- Deficiencies in the Heritage Assessment Report.

Our concerns are obviously linked and will be discussed in that fashion.

Heritage matters

The view eastwards along The Parade is quite unique in Adelaide. It features the towers or spires of three buildings – Norwood Town Hall, Norwood Wesley Church and Clayton Congregational Church (to give them their original names) - viewed against the sky and the Hills Face Zone of the Adelaide Hills. This view is illustrated on pages 14 and 15 of the Heritage Assessment Report. As the report states, this is ‘a historic visual character’ of the area. The Parade at Norwood has retained a great deal of its C19th century visual appearance, probably more so than any other equivalent shopping/business street in Adelaide (e.g. Rundle Mall, Unley Road, O’Connell Street).

The Heritage Assessment Report says virtually nothing about the heritage significance of the State and Local Heritage places. For instance, Clayton Wesley Uniting Church is one of

Clayton-Wesley Uniting Church
cnr The Parade and Portrush Road
Beulah Park S.A. 5067
Telephone – (08) 83903138
gcbishop@westnet.com.au

Adelaide's finest church buildings, a highly significant example of Gothic Revival architecture and is one of less than half a dozen churches in Adelaide with a tall spire. Its architects, Messrs Cumming and Davies, are recognised as being two of South Australia's finest colonial architects. The architectural presence of the church will be seriously compromised by the proposed development.

The report correctly states that *'of the State Heritage places, Clayton Wesley Church [sic Clayton Wesley Uniting Church] is most likely to be materially impacted by the proposed development, due to its proximity to the site, and current visual dominance.'* The report continues, *'The proposal will also have limited impact on the primary setting and views of the Church, namely looking eastward from the western end of The Parade, where the dog-leg in The Parade across Portrush Road has the effect of setting the proposed development back from this important view corridor.'*

This latter statement is true provided the view is seen from no further east than Queen Street; thereafter the proposed development sits close by across the road and dominates the intersection. Furthermore, the report says nothing about the effect of the proposed development when viewed from the other three directions. Of most concern is the view from the north which is shown in the diagram on page 151 of Part I of the Final Development Report. The height of the proposed development is significantly higher than the roofline of Clayton Wesley Uniting Church and the building will loom large above the church. It will destroy the current roofline and spire profile as viewed from the northern side. In a similar fashion, the view from the southern approach will also be largely lost (apart from the spire itself).

This also has potential ramifications for the Church's long-term reroofing plans for the building (see below).

The report mentions that the Peregrine site has been used as offices since 1977. Prior to this, of which the report makes no mention, it was for many decades the headworks of the prominent building company A.W Baulderstone Pty Ltd. Photographs from early last century show the corner site occupied by a single-storey bluestone building bearing the Baulderstone name and surrounded by working men's cottages.

Size of the proposed development

The size of the proposed development is inappropriate for this sensitive location. Furthermore, it exceeds the maximum height envisaged for the Zone (Zone PDC7). To state that it is of similar size to the building approved in early 2015 for the south-west corner of the intersection (not yet even begun) may be fine in the view of opportunistic developers but gives the citizens who elect Councils and Governments little confidence in our planning regulations which can be overridden if someone is persuasive enough. Furthermore, if this proposed development is approved at seven floors it simply opens the way for other such developments in Kensington which comprises almost entirely one or two storied buildings.

We totally disagree with the Heritage Assessment Report's summary that the proposed building will be *'a building that reinforces the intersection, while nonetheless sitting compatibly with the adjacent State Heritage place'* (page 18) and that the proposed development will have *'an acceptable impact on the context of the surrounding State Heritage places'* (page 22). It is hard to see how such statements can be made. The scale of the proposed building will totally alter viewers' perceptions of the intersection and its bulk will dominate the tall, elegant form of Clayton Wesley Uniting Church. The current Peregrine

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building is modern in style but at two floors high and with the set-back does not dominate the intersection. The proposed development is a totally different matter.

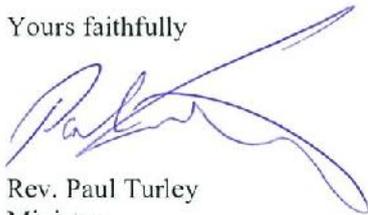
Furthermore, considerations such as the use of stone in the construction *'to reflect the colour and texture of the historic fabric of the area, and in particular, the adjacent Church'* is really meaningless when it is the bulk of the proposed building that will have the main impact, not what might be used as construction materials.

Other considerations

Clayton Wesley Uniting Church is about to undertake a Conservation Management Plan for our listed buildings. This is a considerable undertaking for our members and a preliminary step to a large financial commitment to undertake works on the fabric of the buildings that have already been identified as essential by experienced professionals. Our buildings have State Heritage significance and we would suggest that 'the State' should have some responsibility in helping to maintain them into the future. Why would we bother to restore the original corrugated iron roof and refit the wrought-iron gable lacework if it will no longer be readily visible due to a large new building close by? We are very disappointed in the current Government's lack of interest in 'our' built heritage; that attitude comes through very strongly in relation to this proposed development.

On conclusion, we consider that the proposed development is inappropriate for this site, an intersection which has four State Heritage places and various Local Heritage places nearby and is the focal point of the significant vista eastward along The Parade. We consider that the full impact on the architectural stance of Clayton Wesley Uniting Church property has not been properly assessed.

Yours faithfully



Rev. Paul Turley
Minister



Rev. Richard Miller
Minister-in-Association
Chair of the Parish Mission Council



Dr Geoffrey Bishop
Chair of the Congregation
Secretary of the Parish Mission Council

For members of Clayton Wesley Uniting Church



Clayton-Wesley Uniting Church
cnr The Parade and Portrush Road
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20 October 2016

Martin Julian Childs
53 Bridge Street
KENSINGTON SA 5068

Minister for Planning
Att: Robert Kleeman, Unit Manager
Strategic Development Assessment
Planning & Development, Development Division
Department of Planning, Transport & Infrastructure
Adelaide SA 5000

RE: PEREGRINE MIXED USE DEVELOPMENT – 270 THE PARADE, KENSINGTON SA

I oppose the above development proposal in concurrence with the attached Kensington Residents Association's representation.

Yours sincerely



Martin Childs



Minister for Planning,
Attention: Robert Kleeman, Unit Manager
Strategic Development Assessment,
Planning & Development, Development
Division
Department of Planning, Transport and
Infrastructure,
Adelaide, 5000

The Secretary,
Kensington Residents' Association Inc.,
Mr A Dyson,
42, Regent Street,
Kensington, 5068.
20th October 2016.

Re: Peregrine Mixed Use Development – 270 The Parade, Kensington

Dear Sir,

Our Association is strongly opposed to the proposed development of the Peregrine site as it fails to comply with numerous provisions of the Norwood, Payneham & St Peters Development Plan 2016 (Development Plan). These include but are not limited to:

- the excessive bulk and scale of the proposed building that will dominate this important location with three State Heritage items on the other three corners; and
- a significant and adverse impact on the adjacent Kensington Historic Conservation Zone and Kensington residents living adjacent or near the site;

It will also:

- increase traffic congestion on The Parade, between Portrush Road and Phillips Street; and
- increase parking and traffic problems in neighbouring streets in Kensington, Beulah Park and Norwood.

The proposed development is not in accordance with the Development Plan as recently approved by the Minister of Planning. The declaration of "major project status" is an attempt to subvert the Development Plan and is an example of very poor planning. The Development Plan is supposed to provide certainty to the community and developers alike but such an abuse of the system takes away this certainty and provides benefit only for those that have the influence to achieve major project status.

This proposal would provide windfall profits for the owners as the property was purchased based on its zoning. At the time it restricted development to two storeys.

It is noted that at various places in the Development Report the site is referred to as being in Kensington Park and Kensington Gardens. The failure to consistently identify that it is in fact in Kensington begs the question "*how reliable the report is?*".

With reference to the relevant general and zone specific provisions of the Development Plan, we offer the following comments and objections:

Centres, Shops & Business – (City Wide)

PRINCIPLES OF DEVELOPMENT CONTROL

278 Provision for the movement of people and goods within business, centre and shopping zones or areas should comply with the following:

(a) development should not cause inconvenient and unsafe traffic and pedestrian movements or be likely to result in the need for significant expenditure on transport and traffic works, or facilities within, or outside, the locality;

(d) access to car parking areas should be designed not to cause congestion or detract from the safety of traffic on abutting roads;

(h) on-site parking shall be determined having regard to:

(i) the amount, type and timing of movement generated by the use;

282 Centres should have a minimal adverse impact on traffic movements on primary, or primary arterial, roads.

292 Development within business, centre and shopping zones should be located having regard to the following principles:

(b) development should not generate pedestrian or vehicular traffic onto or across an arterial road in such a way as to materially impair the movement of traffic on that road or to cause safety hazards;

(c) development should not generate significant increases in traffic in adjacent residential areas;

293 Development within business, centre and shopping zones should conform to the following access and car parking principles:

(a) development should provide safe and convenient access for private cars, cyclists, pedestrians, service vehicles, emergency vehicles and public utility vehicles;

(b) access points onto public roads should be located and designed in such a way as to minimise traffic hazards, queuing on public roads and intrusion into adjacent residential areas;

(c) the number, location and design of access points onto arterial roads shown on Map NPSP/1 (Overlay 1) Parts A & B should be such as to minimise traffic hazards, queuing on the roads, right turn movements and interference with the function of intersections, junctions and traffic control devices;

(d) development should provide sufficient off-street parking to accommodate customer, employee and service vehicles;

There are already significant traffic problems on The Parade, with traffic backing up past Bowen Street from Portrush Road for much of the day. At school pickup and peak hours, traffic is often banked up past Phillips Street. An entry and exit onto The Parade would further exacerbate the traffic problems. The traffic situation on The Parade will inevitably lead to queuing across the footpath creating a dangerous situation for the many pedestrians who walk down The Parade to Norwood.

There is also the probability that reflections and overshadowing from the proposed building will affect visibility at this major intersection having an adverse on impact road safety.

The proposal acknowledges that it provides less parking than required by the Development Plan. In addition it suggests that in future there may well be a move to convert other than the basement parking floors to office space! The proposal would generate significant extra parking requirements, over and above that planned for within the development. At present "On the Run" vehicles are often parked in Kensington and Beulah Park, well away from the Peregrine site. Residents in Bowen Street, Phillips Street and Marchant Streets complain of parking problems from Peregrine vehicles and employees vehicles, taking their street parking and at times parking across driveways. Peregrine employees are also known to park as far away from the Peregrine site as Thornton Street.

The development will also generate significant additional traffic in both High and Bowen Streets.

The traffic studies appear to have been done outside of school pickup times. The number of schools in Kensington and nearby streets in Norwood create significant traffic problems at school pick up times and these will be exacerbated.

280 Landscaping should form an integral part of centre design, and be used to foster human scale, define spaces, reinforce paths and edges, screen utility areas, and generally enhance the visual amenity of the area. The use of locally indigenous plant species should be incorporated where it is practical to do so.

The landscaping proposals are minimalistic at best and the landscaping along The Parade would be severely impacted by possible widening of the road as envisaged for introduction of trams. The applicant's track record in maintaining the very basic landscaping in the existing car park calls into question whether or not any proposed landscaping will be properly maintained.

284 Centres should have minimal adverse impacts on residential areas.

294 Development within business, centre and shopping zones should conform to the following design principles:

(d) Development should not cause nuisance or hazard arising from:

(iv) overlooking;

(v) overshadowing; or

(vi) visual intrusion.

300 Industrial and commercial development in proximity to residential zones should not impair the amenity of those residential zones and points of entrance and exit should be located so that the number of vehicles using nearby roads in residential zones is kept to a minimum.

The proposed development will have an adverse impact upon the nearby residential areas. There will be overlooking, overshadowing and visual intrusion for residents in Bowen Street, High Street and Phillips Street. It will be particularly bad for those living in Bowen Street. We are aware that one owner has already sold a Bowen Street property because of concerns about the adverse impact and a family renting in Bowen Street intends moving away if the development goes ahead.

Heritage – (City Wide)

OBJECTIVES

Objective 110: Development that retains the heritage value of State and Local Heritage Places such that the heritage value of the place, locality and the Council area is reinforced through:

- (a) the conservation and complementary development of such places; and
- (b) the complementary development of land and sites adjacent to such places.

Objective 111: Development which conserves and reinforces the historic integrity of the Council area and is compatible with the desired character of the appropriate zone and policy area.

PRINCIPLES OF DEVELOPMENT CONTROL

General

333 Development (including land division) should not compromise or detrimentally affect the heritage value, character, integrity, setting, siting or function of buildings or sites of architectural, historic or scientific interest, sites of natural beauty or places of heritage value identified in Tables NPSP/5 and 6 as State or Local Heritage Places.

Development on land adjacent to land containing a heritage place

345 Development on land adjacent to land containing a State or Local Heritage Place as designated in Tables NPSP/5 and 6 should respect the heritage value, integrity and character of the heritage place and should clearly demonstrate design consideration of the relationships with the heritage place and its setting (without necessarily replicating its historic detailing) and the character of the locality by establishing compatible:

- (a) scale and bulk;
- (c) proportion and composition of design elements;
- (d) form and visual interest (as determined by play of light and shade, treatment of openings and depths of reveals, roofline and pitch and silhouette, colour and texture of materials as well as detailing, landscaping and fencing);

346 Development on land adjacent to land containing a heritage place and sited in strategic locations, such as corners or at the termination of vistas, should have a scale and visual interest in the streetscape at least equal to that of the adjoining heritage place, providing the heritage value of the place within its setting is not diminished.

347 Development on land adjacent to land containing a State or Local Heritage Place should not be undertaken if it is likely to dominate or detract from the heritage value and integrity of the heritage place by way of design, appearance or standard of construction.

The proposed development fails to meet the above objectives and principles with regard to its impact on adjacent State and Local Heritage places. At various places in the development report the building is claimed to be of seven storeys, including in the heritage impact assessment. With a ground floor, seven acknowledged levels and the roof level that is effectively two storeys in height, the building is in reality ten storeys high.

The bulk and scale are massive and the proposed building will dwarf the State Heritage listed buildings on the other three corners of the intersection and make them insignificant. On this basis alone the application should be rejected.

BUSINESS ZONE

Introduction

The objectives and principles of development control that follow apply to the Business Zone shown on Maps NPSP/9, 10, 21 and 22. Further principles of development control also apply to policy areas that are relevant to the zone. The combined provisions for the zone and its related policy areas are additional to the City Wide provisions expressed for the whole of the council area.

PRINCIPLES OF DEVELOPMENT CONTROL

Non-complying Development

12 The following kinds of development are non-complying in the Business Zone:

The change in the use of land to, or the erection, construction, conversion, alteration of or addition to a building for the purposes of, the following:

Indoor Recreation Centre

Office with gross leasable area greater than 250 square metres, except in the West Norwood Policy Area

Shop or group of shops with a gross leasable area greater than 250 square metres

DESIRED CHARACTER

Kensington Policy Area

Kensington Policy Area occupies a key location at the corner of The Parade and Portrush Road. Development should comprise high quality offices, consulting rooms and retail showrooms.

The corner of The Parade and Portrush Road is a visually prominent site within the city and any new building should be of massing and configuration which visually reinforces the corner, whilst respecting the scale of buildings in the adjacent Historic (Conservation) Zones and maintaining the prominence of the State Heritage listed buildings on the south-western, north-eastern and north-western corners of the intersection of Portrush Road and The Parade.

The Parade and Bowen Street should provide the primary points of access for delivery, service and visitors' vehicles. The creation of new vehicle access points onto either Portrush Road or the portion of The Parade close to the Portrush Road intersection should be avoided.

PRINCIPLES OF DEVELOPMENT CONTROL

4 Development adjacent to the Kensington 1 and Kensington 2 Policy Areas of the Residential Historic (Conservation) Zone should be compatible in design and scale with the character sought for that Zone and those Policy Areas.

7 Development in the Business Zone should not exceed two storeys in height above mean natural ground level, except where identified in the West Norwood Policy Area and the Magill Road West Policy Area, where development incorporating a residential component above ground level non-residential land use/s, should not exceed three (3) storeys above natural ground level.

Principle 12 lists non-complying developments in the zone. These include, an indoor recreation centre, offices with a leasable area greater than 250 square metres and shops with a leasable area greater than 250 square metres. The proposed development clearly contravenes these conditions of this principle.

Rather than reinforcing the corner with a building that respects the scale of the buildings in the adjacent Historic Conservation Zones and maintaining the prominence of the State Heritage listed buildings, the proposed building will completely dominate the intersection and neighbouring streets, dwarfing the three State Heritage items on the intersection and also detract from the State Heritage listed Benson Fountain on the corner of High Street and Portrush Road.

Contrary to the desired character statement that discourages the creation of new vehicle access points on the two major roads, the proposal has a major entry and exit point on The Parade. This would further exacerbate the existing traffic problems on The Parade as previously indicated.

It is not compatible in either design or scale with the character sought for the Kensington Historic Conservation Zone.

Principle 7 quite specifically states that development in the Kensington Policy Area of the Business Zone should not exceed two storeys in height above ground level. This proposal for a ten storey building is in such direct contravention of this principle that it should be rejected outright.

The Heritage Assessment Report is inconsistent. In some places it indicates there are two Contributory Items in Bowen Street, namely Nos 6 and 8 Bowen Street. In other places it only refers to No 8 Bowen Street as a Contributory Item.

Other Comments:

It is noted that the proposed swimming pool extends beyond the boundary of the site and overhangs The Parade.

Conclusion:

In conclusion we stress that this development application is at serious variance with the Norwood Payneham and St Peters Development Plan 2016 for the following reasons:

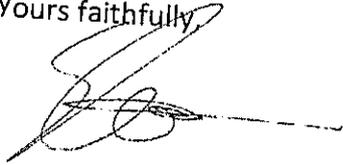
- the proposal is for a building that is the equivalent of ten storeys, whereas it is zoned for two storey development;
- it will dominate this important location and dwarf with three State Heritage items on the other three corners and the State Heritage listed Benson Memorial Fountain;
- it will have a significant and adverse impact on the adjacent Kensington Historic Conservation Zone and Kensington residents living adjacent or near the site;
- it will significantly increase traffic congestion on The Parade between Portrush Road and Phillips Street;
- it will increase parking problems in neighbouring streets in Kensington, Norwood and Beulah Park;
- the proposal includes three non complying uses within the Business Zone; and
- it is a gross overdevelopment of the site.

Accordingly, our Association requests that the Development Assessment Commission reject the development application, as to approve this development would be to throw away the existing planning rules that have been established by Council and Government to provide for orderly and

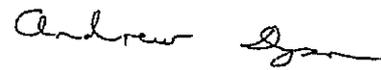
appropriate development. This development may be appropriate for the Central Business District or Greenhill Road, but is not appropriate on this site, the gateway to the Kensington Historic Zone and one of the key intersections in the Eastern suburbs with its three State Heritage items.

Our Association requests that we be given the opportunity to address the Commission when the matter is considered.

Yours faithfully,



Stewart Caldwell
President (0402 044 118)



Andrew Dyson
Secretary (8331 9654)

- cc City of Norwood, Payneham & St Peters,
City of Burnside,
NPSP Mayor & Councillors,
Mr Steven Marshall, Member for Dunstan,
Mr Steven Griffiths, Shadow Minister for Planning,
Local Government Association of South Australia,
Norwood Residents' Association,
St Peters Residents' Association,
Community Alliance SA,
National Trust of South Australia,
Environmental Defenders Office.

2015/19300/01



POWW

Power Of the Written Word

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Hon John Rau MP

Minister for Planning

Dept of Planning, Transport and Infrastructure

GPO Box 1815

ADELAIDE SA 5001

23 OCTOBER 2016

Dear Minister

Thank you for the opportunity to provide comment on the Development Report (DR) regarding the Proposed Peregrine Mixed Use Development, 270 The Parade, Kensington.

I write to express concern and shock over the proposed development!

On the Australian Government Tourism website, it invites and promises all to "soak up Adelaides' **elegance**". How well said and aren't we all proud!

The Norwood precinct is one of Adelaides' gems. Drive up The Parade from the city towards the Eastern suburbs and feel the buzz. More importantly however, take in the vista!

At the end of the Parade is the beautiful and iconic Clayton Wesley Church and Spire and the Norwood Town Hall, plus, according to the DR, a total of "**SIX State Heritage places located within 200 metres from the subject land**"(2.4) . Three of which are located on the adjacent three corners of the "subject land"!

"Subject land" which is proposed to footprint a 7 storey, 38.15 metre high "Mixed use" development made primarily of glass, steel, concrete and sandstone! (3.3.3)

I totally disagree with point 4.17 which states that the proposed development will be a “high quality **landmark design** for the site, the local area and the wider metropolitan area”.

There are lots of references in the report discussing building strategies to “diminish the scale and mass” of the upper levels of the building. And ways of “reducing the visible impact so it dissolves into the hues of the sky”. This is unbelievable PR waffle. A glass, steel, concrete and sandstone 7 story structure will not dissolve into the hues of the sky!

What it WILL do is **seriously impact** the Norwood and surrounding street scape, environment, heritage area and vista; attributes which we have all grown to love and enjoy.

Yours sincerely



Julie Kroehn