

## Philbey, Janine (DPTI)

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**From:** Mackenzie, Alex (DPTI)  
**Sent:** Monday, 19 October 2015 3:06 PM  
**To:** Philbey, Janine (DPTI)  
**Subject:** Fwd: Development Report Submission

Sent from my iPhone

Begin forwarded message:

**From:** "DPTI:PD DAC & Major Developments Panel"  
<[DPTI.PDDAC&MajorDevelopmentsPanel@sa.gov.au](mailto:DPTI.PDDAC&MajorDevelopmentsPanel@sa.gov.au)>  
**Date:** 19 October 2015 at 2:31:59 PM ACDT  
**To:** "Mackenzie, Alex (DPTI)" <[Alex.Mackenzie@sa.gov.au](mailto:Alex.Mackenzie@sa.gov.au)>  
**Subject:** **FW: Development Report Submission**

Adelphi submission

**Sara Zuidland**  
Department of Planning, Transport and Infrastructure  
Tel 08 7109 7060 | Fax 08 8303 0753 | Email [sara.zuidland@sa.gov.au](mailto:sara.zuidland@sa.gov.au)

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**From:** Zhong Ang [<mailto:zhong.a.ang@gmail.com>]  
**Sent:** Sunday, 18 October 2015 7:17 PM  
**To:** DPTI:PD DAC & Major Developments Panel  
**Subject:** Development Report Submission

Minister for Planning

Attention: Mr Robert  
Kleeman

Unit Manager, Crown, Major Development &  
Grants

Investment Management, Development  
Division

Department of Planning, Transport and Infrastructure  
(DPTI)

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Dear Mr Kleeman

Glenelg North is ready for the Marina Regency Hotel. When my overseas acquaintances visit from Asia, it will be ideal to recommend accommodation on Adelphi Terrace, as they rarely see the ocean. It will also be of financial benefit to the local economy.

When viewing the typical suggested floorplans some do not make sense on the residential apartments as the glass walls that meet at right angles are all bedroom layouts! A living area needs to have the attractive aspect that joining glass achieves especially if you arrive at a north orientation.

Regardless of where front entrance doors come into an apartment, as you are aware a floor plan can be designed to bypass bedrooms and bathrooms. As typical bathroom drawings are fairly large, they could be

reduced in size. This will achieve more space in the living area, also the kitchen areas where owners prepare meals on a daily basis in the residential apartments. I assume laundries are also included in the kitchen layout? If so, reducing the kitchen size further?

A suggestion for the balcony elevations....the balcony plan indicates a white base of 700mm with glass continuing to 1200mm ... it would be appreciated if architects and engineers would please reconsider the height of the solid white base of 700 mm and reduce it to, say 400 mm, the remainder being reinforced balcony glass of 800mm? By increasing the glass height, this would avoid the restriction of formerly built older high rise balconies eg. the apartments located nearby on the southern side of Adelphi Terrace. Lowering the solid base of the balcony will achieve a better balance as a 700mm solid base will limit views from residential and hotel accommodation.

Kind Regards,

Zhong Ang

RECEIVED

19 OCT 2015

DAC

14.10.2015

Minister for Planning,

C/-Robert Kleeman, Unit Manager, Crown, Major.

Development and Grants

Department of Planning, Transport and Infrastructure (DPT)

GPO Box 1815

Adelaide SA 5000

AIME M BOWERS

BOWERS LEASING

The Aquarius  
7/4 Adelphi Terrace  
Glenelg North 5045  
South Australia

Phone 08 8376 4381

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Mobile 041 884 8881

Email :

aime.bowers@bigpond.com

Dear Sir,

I would like to tender my submission to the Major Development Application at 6-10 Adelphi Terrace Glenelg North.

Firstly I would like to state my strong objection to the State Government involvement in overriding the Holdfast Bay Council Building regulations again to promote a hi-rise commercial structure completely at odds with the ambient, suburban architecture prevalent in this area.

In doing so they omitted to press on the developers simple guidelines to observe to protect the neighbouring areas privacy, their right to sunlight, their rights to footpath and road use-age all of which will be permanently compromised by this development.

There are many aspects of this proposal which infringe on existing planning regulations applying to this area. The State Government must treat with respect the rights of the constituency to have a right to live in an environment of their choosing without the threat of substantial devaluation of their properties.

I shall list just a few of the major points for discussion.

The southern aspect of the building shows full size windows and balconies on floors from 4 to 10 facing Canning Street. This is totally unacceptable as the existing building right across the street has full size windows and balconies facing directly at the proposed new building and the right to privacy will be grossly invaded by the proposed plans. Not only to the existing tenants but also the new tenants as the distance between the two buildings will be quite narrow. It is a total breach of the privacy act to allow clear glass to be used where it inflicts on the privacy of the neighbours. This can-not be allowed under any circumstances.

The visual impact of on the Aquarius Building, particularly on floors 5,6,7,11,and 12 is considerable as it blocks out the Northern view, the skyline and of course the sunlight. The most important selling point of the Aquarius apartments was the 360 degree view over Adelaide and surrounds, which will be obliterated by the proposed building.

The sheer volume of 205 individual tiny units crammed into a small space is quite unbelievable. The average 1 bed motel room measures just 4.6 squares, the 2 bed room motel unit just 6.7 squares.

The apartments are just 10.1squares and even the penthouses are a bare 11.1squares. What sort of clients do they expect to get into those rabbit-holes? It is a ghetto to be waiting to be opened.

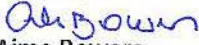
Supposing that each unit houses two people it is still 410 people with just 204 car-parks to go around. Where are the 65 staff and casual clients going to park? There is no room for parking on Adelphi Terrace nor on either side of the proposed hotel. There are 7668 sq.m allowed for the 204 car parks, which equates to just 3.195 per car. It allows scarcely sufficient space to manoeuvre in and out of the car parks.

Adelphi Terrace is a tight narrow road and to increase the proposed traffic load on it is simply ridiculous. To make matters even worse the plan shows five infringements of about 3 meters on to the actual road, cutting more parking spaces. This will push the bike lane right out to the middle of the road. Adelphi Terrace is only a narrow one lane each way road which is a busy thoroughfare for North-South traffic throughout the day. It cannot be narrowed any further. I often have difficulty driving out of my own driveway for traffic lined up to the stoplights and almost impossible to cross the road to go in the Northerly direction. With the advent of a further 300 to 400 tenants, staff and visitors moving into the area there will be utter chaos. It is a sure-fire recipe for accidents to happen. Is the State Government willing to cover for the loss of life for approving this totally out of place and over development of the proposed plan?

The Proposal for Major Development Application for 6-10 Adelphi Terrace Glenelg states that it is for a 12 story building. This is absolutely incorrect as the building plans quite plainly encompass 15 floors. On the basis of that alone, as the proposed plans are not compliant with the scope of major development guidelines they should be rejected in total.

I would be happy to have my submission made available for public inspection.

Sincerely,

  
Aime Bowers

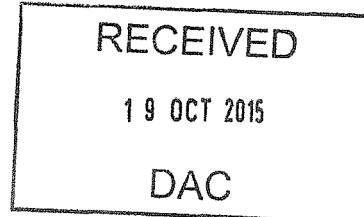
7/4 Adelphi Terrace, Glenelg North S.A. 5045

[aime.bowers@bigpond.com](mailto:aime.bowers@bigpond.com)

P.S.

I note that the Government has initiated a Development Plan Amendment in the local area. However, further engagement with the local community re details of future zoning and planning policy should have occurred with the local community before it was initiated not after it was rushed thru. As a member of the community I would like to object strongly to the high handed manner the State Government pushed through this amendment.

Minister for Planning  
Attention: Mr Robert Kleeman  
Unit Manager, Crown, Major Development Division & Grants  
Investment Management, Development Division  
(DPTI)  
G.P.O. Box 1815, Adelaide S.A. 5000



16<sup>th</sup> October 2015

Dear Sir,

RE: ADELPHI TCE GLENELG INTEGRATED HOTEL DEVELOPMENT (MRH)

My main issue is to do with my rental property at 1/7 Sturt St Glenelg, immediately behind the property development.

The tenants, within days of hearing of this development (MRH) gave notice and bought another property and left. They had been my tenants for many years. Their reasons for leaving were the disturbance and noise during the long building process, the removal of afternoon sun and the imposition of overlooking.

At the same time the lady next door, having lived there since the mid eighties, put her home on the market. To date her house has not sold, nor my house rented nor much interest shown.

Overlooking and loss of privacy is not expected in a suburban low density environment such as Sturt St. The explanations are weak e.g. any object more than 15 metres away is assumed not visible. My upper bathroom and bedroom and back yard in Sturt St are in full view of MRH eastern windows. I have the exact view in size and distance from my Adelphi Tce 12<sup>th</sup> story window over 5 houses to Sturt St and I can assure you that I have by chance seen many things in back yards. Over the years almost all these back yards have built over protection and or large trees planted. Most people have binoculars to magnify from high apartments. Advertising for MRH repeatedly stress the "unrestricted views eastward from hotel to city and hills".

Overshadowing again has weak explanations e.g. the amount of sun when MRH is built is given but never the hours of sun lost because of MRH. Ring Bowling will not survive with the reduced sun because of MRH.

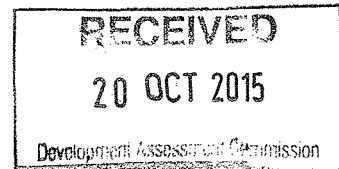
Under 8.1 Zoning the last paragraph is in my opinion a misleading statement "the site is abutted largely by non-permanent residential land users including tourist and short stay accommodation and a small ring bowling club". I would say "the site is surrounded largely by 9 permanent residential land users with ..."

The land which will be affected by MRH is in my opinion one of the nicest residential areas in Glenelg. I also have difficulty in accepting near certain financial loss from another's gain.

A handwritten signature in black ink, appearing to read "J.K. Miller". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dr J K Miller  
Apt 12/4 Adelphi Tce  
Glenelg North SA 5045  
Ph (08) 8294 4952

Minister for Planning  
Attention: Mr. Robert Kleeman  
Unit Manager, Crown, Major Development @ Grants  
Investment Management, Development Division  
(DPTI)  
G.P.O. Box 1815, Adelaide S.A. 5000



16<sup>th</sup> October 2015

Dear Sir,

RE: ADELPHI TCE GLENELG INTEGRATED DEVELOPMENT (MRH)

I live in Apt. 12 (Aquarius), which is on the other side of Canning St opposite the proposed development. I oppose aspects of the new development.

1. The sudden changing of permitted heights from Council's long-standing 3 stories to 12. This height is not consistent with the overwhelming 1 and 2 storey buildings in the locality.
2. It is not, as said, consistent with "beachside, tourist and commercial precincts of the locality". The locality is not beachside and there is little commerce or tourism in the area. The locality is one of the nicest residential areas in Glenelg.
3. The "comprehensive consultation process" in 3 weeks!
4. The "all glass" walls will over look my lounge and kitchen.
5. My North-West view may be curtailed. I attach a map and letter. I have tried for a larger or more interpretive map, to date unsuccessfully. The potential loss of N/W view would, I believe, be lessened by straightening the Southern bend to the West shown in the next map.
6. Zoning 8.1 The Site is surrounded by 9 residential dwellings as well as those "abutted". The zone is as stated focused on residential development. To me, it contains 90% 1 & 2 storey dwellings. To me MRH as a 12 storey building including 146 suites is entirely incompatible.
7. Desired character - why is "a higher degree of overshadowing and loss of privacy expected". Why expected to long-standing 1-2 storey residences?

Yours faithfully,

A handwritten signature in black ink, appearing to read "John K Miller". The signature is fluid and cursive.

Dr John K Miller  
12/4 Adelphi Tce  
Glenelg North S.A 5045

Dear Dr. Miller, it was lovely to meet with you on Sunday.

Further to your query please find attached plan at 1:5000 indicating the impact of the proposed new hotel on the views from your building.

As you can see you should still have unobscured views along the Patawalonga.

Should you have any further queries please do not hesitate to contact us.

Kind regards

HELEN DYER  
DIRECTOR

# HELEN DYER & ASSOCIATES

Level 3, 15 Edsall Street  
Norwood SA 5067

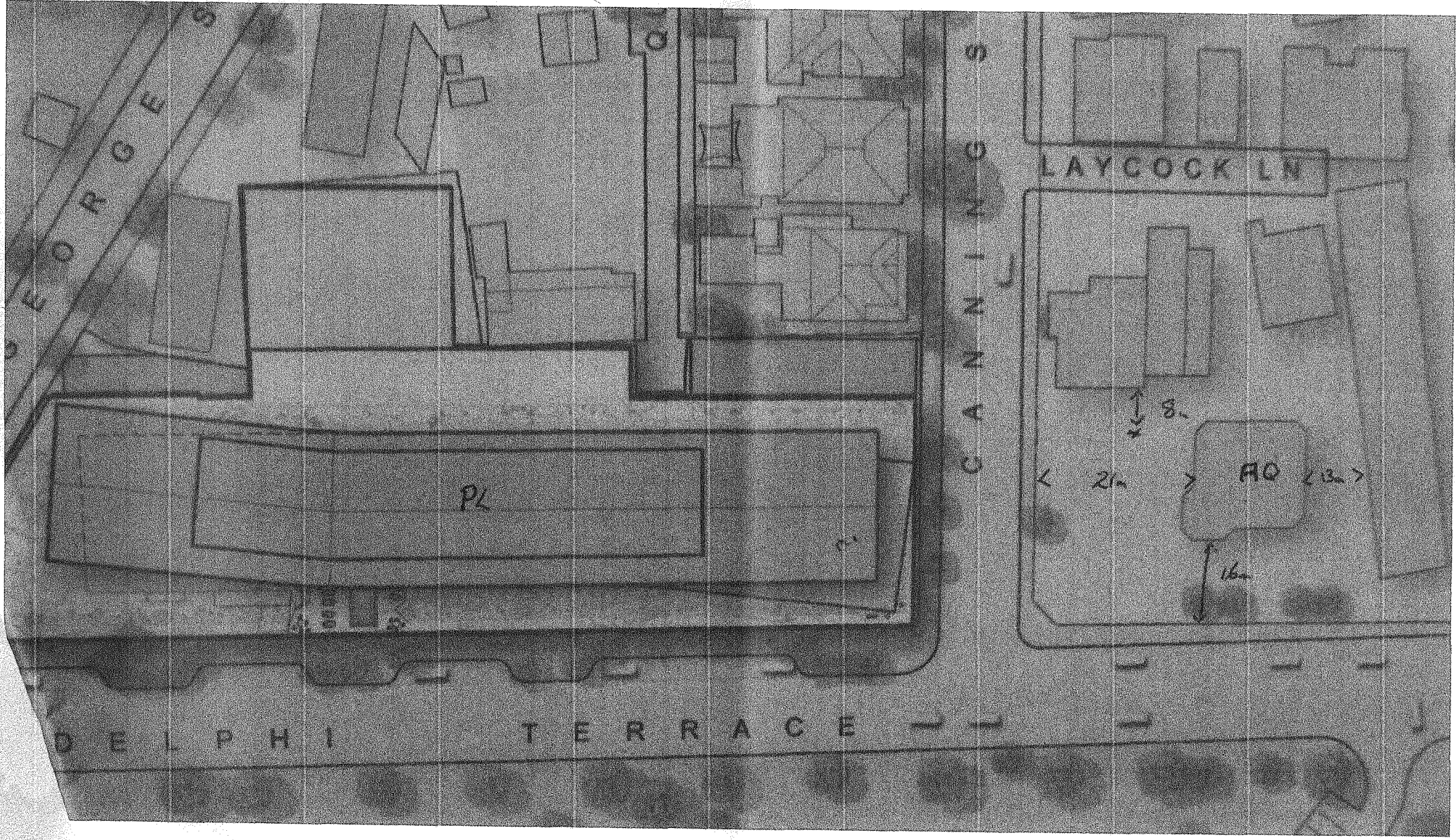
Telephone: 0447 004 707

Email: [helen@helendyer.com.au](mailto:helen@helendyer.com.au)





MAP A



Ref: 2015-0295

28 October 2015

Minister for Planning

**Attention: Mr Robert Kleeman**

Unit Manager, Crown, Major Development and Grants

Department of Planning, Transport and Infrastructure

GPO Box 1815

ADELAIDE SA 5000

Email: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Minister

### **Representation concerning Major Development – Integrated Hotel Development, Adelphi Terrace, Glenelg**

URPS acts for Dr John Miller, the owner of 1/7 Sturt Street, Glenelg North. The land is approximately 60 metres east of the above development site, positioned on the north-west corner of the intersection of Sturt and Queen Streets.

I have inspected the land, the dwelling and the locality of the development site following instructions from Dr Miller to review the application details in the Development Report (the “DR”) prepared by Holmes Partners, the accompanying applications drawings and reports and prepare an opinion for the purpose of a submission on the impacts of the Major Development on the owner’s land and locality. I have also had the benefit of views of the locality from levels 6 and 12 of the nearby Aquarius Apartments, which is a similar height and number of storeys to that proposed in the application.

#### **Existing conditions for 1/7 Sturt Street**

The dwelling is a semi-detached two storey dwelling which has its principal elevation facing Sturt Street. The ground level and upper level rear windows to the kitchen area and bedrooms respectively face west directly towards the development site. The allotment’s private open space at the rear has a small northerly aspect. Although there is some overshadowing of that outdoor living area from the dwelling itself and its mirror image neighbour in the morning, the amenity of the small area of open space is enhanced by the reasonable access to afternoon sun, other than a small amount of shadow created by the single storey garage with a gable end pitched roof. These impacts are typical of small scale residential development as is typical of this locality in the Residential Character Zone.

There is only a minor amount of covered outdoor space over the rear door for weather protection (evident in the attached photos). The associated garaging is accessed from Queen Street and there is no obstruction



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of the direct line of site from the rear windows and open space by the single storey garage as it is setback from the Queen Street Road frontage, and north of the location of the open space.

In terms of the visual impact of other 12 storey developments on Adelphi Tce, the Aquarius Apartments are evident in the skyline to the south-west. Although tall, it does not dominate the skyline. It is occupied by only one dwelling per floor, hence the large windows on its northern facades (and smaller windows on the eastern facade) minimise the degree one feels overlooked from that building, notwithstanding looking down does actually provide clear views across the wider locality including into rear yards of surrounding residential properties. Pines and the top of the HMS Buffalo masts intersperse the views of the skyline as viewed from the upper level rear windows and/or the rear yard and from other parts of the locality of this Sturt Street property. Although coastal/water views are not possible from this land or buildings, these are elements that give the land and locality the characteristic coastal feel.

I am instructed that the previous tenants in the property (family members) have relocated since learning of the proposed development in the earlier informal publicity. The property has not attracted tenants since that time, despite the efforts of a local real estate firm having been engaged to manage the property. Dr Miller anticipates similar difficulty in selling the property if it cannot be tenanted, and these conditions will only be exacerbated if this major development is constructed as proposed.

The following opinions on the Major Development apply to varying degrees to all the residential allotments up to the western side of Sturt Street between Canning and George St, notwithstanding the building will have an extensive visual impact on the skyline beyond these parameters.

The Development Guidelines prepared for the applicant by the Development Assessment Commission (DAC) July 2015 requires that the Development Report provided by the applicant must include various details. The key issues for Dr Miller's property are summarised under a series of headings below.

## Policy Context

### Existing Provisions

Notwithstanding an application being declared and assessed under the 'Major Development' provisions is not necessarily required to comply solely with the Holdfast Bay Development Plan, the extent to which the proposal departs from the current policy cannot be overlooked.

Departures from the Development Plan in terms of land uses (eg shop >80sqm, restaurant, entertainment venue/convention centre) represent forms of development that are often characteristic of tourism developments. While such uses are somewhat related to the existing use of the development site, the floor areas dedicated to these activities are only achievable by the proposed substantial departures from desired built form outcomes.

The expressions of Desired Character for the development site's Residential High Density Zone – Urban Glenelg Policy Area 15, envisages *"a higher degree of overshadowing and loss of privacy is expected in the policy area given the medium-to-high density nature of development (and heights)."* There is a current 3 storey limit in the relevant Precinct 15. While there are other quantitative provision that impact on the number of dwellings achievable on any one site and other provisions limiting tourist development to "where site conditions permit" there is scope under the current policy to increase the number of

dwellings/apartments and tourism activities provided the design and siting on the subject site is reasonably compatible with the character and amenity of its locality.

The proposed development site which extends for the whole block between Canning and George Streets for a distance of 131 metres to Adelphi Tce, proposes high site coverage compared to the closest similarly sized building in this locality (Aquarius Apartment). There is built form on the sites east and north boundaries for the most part comprising 3-4 storey car park construction. The “tower” component is an additional 10 hotel/apartment levels (plus plant) above the top car park level. This building represents a substantially higher degree of overshadowing than current conditions, and an impact that is not envisaged for existing uses in other zones outside of the Urban Glenelg Policy Area 15. The development site is intended for high density development, but not high rise. There is no objection to or impediment to achieving higher density on this site, nor increasing the number of storeys above the existing two storeys in the form of medium rise up to 3-4 storeys, but the scale of the built form proposed, the resultant significant change in overshadowing impacts from the high rise development and the overall significant compromise to the level of amenity currently enjoyed in this locality is not supported.

### *Proposed Policy Investigations by the Minister*

Furthermore, the owner is particularly concerned that this application has been lodged before the State Government has released its draft Development Plan Amendment (DPA) which will summarise and include draft policy changes that are being considered for allotments fronting Adelphi Terrace (among other sites). The local community has not yet been presented with the opportunity to review and comment on draft policy (a requirement under the Development Act and Regulations) but is being asked to consider a built form outcome that is significantly different from current Development Plan policy.

This application for a 13 storey building (+ plant level) is premature at best as there is no certainty that the pending DPA will ultimately introduce a ‘high rise’ policy for the development site of the kind proposed, or if it does, to what extent the high rise could be capped at or limited to for any number of sites/localities:

- having regard to the constraints presented by narrowness of allotment depths fronting Adelphi Terrace
- in response to public submissions after Public Exhibition of the DPA, noting there are numerous residential premises that are equally affected by the significant overshadowing and other impacts arising from this Major Development.

The fact that the Major Development is being assessed outside the conventional development assessment process means the appeal rights are not available to persons making a representation.

### *Residential Character and Amenity*

As noted above, it is understood that the current Development Plan is being set aside for the purposes of assessing the application, notwithstanding its intent must be considered in the general context of the broader development assessment as required by the Guidelines in 3.2 Consistency with Policy and Legislation. In my opinion the departure from the current policy is significant and results in poor outcomes in terms of the character and amenity of this locality, in particular as it applies to the residential area to the east of the Development site.

Amenity is defined in the Development Act as *“any quality, condition or factor that makes, or contributes to making, the locality or building harmonious, pleasant or enjoyable.”*

Having observed the lines of sight achievable to residential properties and what is visible from the 6<sup>th</sup> and 12<sup>th</sup> floors of the nearby Aquarius Apartments, and the concerns of the owners of the Sturt St property, I concur with their opinions that the perception of overlooking from the apartments and accommodation units on the eastern elevation is overlooking. Putting aside any theoretical desirable distance to mitigate direct views from one property to the next (the DR refers to 15 metres in the Good Residential Design Guide SA Handbook) it is my observation that even over a distance of even 50 to 70 metres from that height, people can be easily observed in and moving about in the private yards. This was readily apparent in the outlook described above although the attached photos do not reproduce that observation well. I also observed and am instructed by residents in high rise apartments that the residential neighbours to the west of the Aquarius Apartments, have over time modified private open spaces with more roofed extensions to provide more privacy. Some of these are on the south side of a dwelling so it is not envisaged these structures were for shade. It has the effect of reducing the available ground level private open space that is open to the sky which detracts from the amenity of the outdoor space.

The reference to any “mutual overlooking” on page 49 of the DR and the author’s conclusions that the proposed building sitting “comfortably within the Glenelg skyline is not strictly applicable in the case of Dr Miller’s property. I note the View Study numbered 03 is not representative of Dr Miller’s dwelling because the single storey garage is not positioned where it obstructs the direct view line between the dwelling and the proposed east elevation. The View Study numbered 04 is the relevant viewshed, and almost all levels with balconies (but to varying degrees at some points) can be observed from the rear yard over and above one and two storey buildings on adjacent sites. The entire eastern facade will be the dominant view of the skyline from the upper level bedroom window.

A person in the rear private yard of this Sturt Street property, or a person in the upper level bedroom window, cannot avoid the dominance of the proposed built form to the west, and could understandably be justified in their concerns of perceptions of being overlooked (even at a distance > 15metres) and loss of amenity as a consequence of being faced with the windows and balconies of up to 74 apartments / hotel rooms on the east elevation.

### Overshadowing

Although the Shadow Study Diagrams submitted with the application are rated as ‘Standard Assessment’ for the purposes of the DR, its effect is significant to the local amenity in terms of this neighbourhood and particularly those dwellings to the east such as Dr Miller’s property on Sturt Street. The Neighbourhood Interface is rated in the DR as ‘Critical Assessment’

As already emphasized the overshadowing impact arising from the design and height of this Major Development represents a substantially higher degree of overshadowing than current conditions, and an impact that is not envisaged for existing uses in other zones outside of the Urban Glenelg Policy Area 15.

The proposed development will introduce the largest scale building on Adelphi Terrace in this section of the residentially zoned land. Although it is of similar height to the Aquarius Apartments, it is of substantially greater building mass extending almost the entire the length of the site for over 100 metres. It has a significantly different impact than the Aquarius Apartments in terms of overshadowing. The comparatively significantly smaller foot print of the existing tower opposite has a much smaller overshadowing impact at different times of the day as the sun moves around, lessening the duration and extent of overshadowing impacts through its design and building setback relationships.

Although Design Quality is rated 'Medium Assessment' in the DR, there are clearly alternative built form outcomes that would reduce the spatial extent and loss of amenity due to overshadowing.

## Access and On-site Car Parking

### Acoustic Impacts

It is noted that the existing noise environment was tested in 3 locations (Figure 2 in Section 4) but these do not include any locations to the east of the development site.

The acoustic assessment does not correctly identify the entire development site in Section 6.2.1 Figure 3 although it is acknowledged that the section omitted is for the purposes of a 3-4 storey car park and may not have any openings to the east. However Section 7.3 describes the receivers most affected by the *“operational noise events from the multi-level car park are likely to be those residential properties to the east”*. If further detail of the car park facade is left to the detailed design stage, this provides no assurance to residents to the east of the ability to minimise noise impact in order to comply with relevant noise policy.

The outdoor swimming pool on level 5 (level 3 according to the plans) appears to be within an open sided area to both Adelphi and to the east. There is a pool bar and seating (most likely with food service) that would be operational day and night. This appears to be another potential noise source to residents to the east which is not fully considered in the acoustic report.

### Design and Siting of Access and Car Park elements

Other provisions relevant to this aspect of the proposal are summarised as follows:

1. The proposal incorporates above ground parking over four levels to accommodate estimated on-site parking demand. The external wall height of the car park development (essentially the podium height built on the allotment boundary) correlates with the finished height limit for buildings envisaged in the zone. The provisions for Policy area 15 envisage basement parking for buildings of four or more storeys. If this was achieved in the development, there would be opportunities to reduce the overall height and number of storeys which could minimise the visual impacts external to the site.
2. The MFY traffic assessment is that on-site parking is in accordance with the Development Plan. In some instances the car park demand rates are not the Development Plan rates, but lower rates based on trends. It is not clear whether the 65 FTE hotel staff identified in 5.8.3 are considered in the parking demand estimates. The applicant should provide clarification as to the impact and demand for parking by staff given their estimates of the FTE will change from 30 to 65. These are likely to involve shift changes and the like, so there is potential more turn-over of vehicles on-street and on site as a consequence of the development.
3. Statements in the DR support this location because it has the attributes of a major transport corridor. The closest public transport is a bus service on Adelphi Terrace and the tram is some 500-600 metres to the south in the District Centre Zone. The District Centre Zone has the appropriate locational attributes that support the high density mixed use development such as proposed. Close proximity to fixed line transport might provide justification for development that has more of the character of an activity centre at the scale proposed and would lend support to reducing the amount of on-site parking to be provided with the development. This would in turn reduce the proposed carpark's contribution to overall built form and potentially site coverage through a reduction in above ground levels dedicated to car parks. This is demonstrated by the current Development Plan's arrangement of Precincts in this Residential High Density Zone, which

identifies the Twelve Storey Precinct 5 significantly closer to the Jetty Road (the tram line) and the District Centre Zone.

4. Reducing the total number of apartments/hotel rooms in a medium rise development scenario would also reduce the area dedicated to parking on site, and related impacts reduced by incorporating under-croft / basement parking as per other development Plan principles.
5. The Major Development proposal changes the access arrangements to rely on two local residential side street entrances for vehicle access. Although there is some ground level parking on the site in these two localities, the Canning St access is new.
6. On the understanding the design capacity of Adelphi Tce is sufficient to cater for the movements generated by this development, it is conceivable that a single central two-way access (or possibly two catering for different vehicle types or a one way movement with passing/loading bays) on Adelphi would be a more desirable approach to maximise the distance between driveways and the intersections with the north and south side streets.
7. On an allotment frontage in excess of 100 metres, traffic movements generated by a 'major' development, that generates a significantly greater number of cars and commercial vehicles than conceivable under the current density provisions, are more appropriately contained within the main road corridor. The proposed access points on the local side streets are adjacent other residential premises fronting those side streets, hence the change to traffic noise and conditions arising as a consequence of the significant density increase, will be quite apparent in the residential side streets if constructed in the proposed locations.
8. Based on the Acoustic Assessment the proposed building can be easily design with adequate attenuation treatments to minimise impacts of traffic noise on Adelphi Tce, therefore there is no constraint to an alternative access arrangement in terms of acoustic impacts.
9. One or two access points (maximum) confined to Adelphi Tce only, still provides a significantly improved pedestrian environment on Adelphi Terrace compared to existing conditions. With appropriate design treatment, the crossovers can easily be managed to maximise safety and sight lines at crossovers on this road. Any impacts of commercial vehicle and waste truck movements can be confined to the main transport route without interference to existing residential traffic close to the intersections of Canning and George streets. An amended design would still be capable of distributing different types of vehicles to separated parking and loading / manoeuvring areas, which might be on different basement levels.
10. Although no specialist traffic advice on the Traffic and Parking assessment has been undertaken for the purpose of preparing this representation, it is noted that there are an extensive number of assumptions built into the estimates of demand. If these prove to be underestimated, Dr Miller advises that any additional on-street parking demand will, in his experience, be competing with on-street demand generated by the local Ring Bowl club, visitors to public parks and other uses in the wider locality (including the Watermark Hotel) and the recently licensed Buffalo development.

### Summary of the Representation

Land owners and residents in this locality have reasonable and justifiable concerns that this Major Development negatively impacts on neighbourhood character and amenity through its significant departure from the envisaged scale of development and consequential off-site impacts. Not all the proposed land use activities are within the "small scale" parameters envisaged for this part of the established residential area of Glenelg (eg entertainment venue, shop, restaurant) and coupled with total number of hotel rooms and dwellings, the character and amenity of this locality becomes more like an activity centre rather than a residential area.

If this development is approved, there is potential for this significant horizontally and vertically proportioned built form to become the repeated form of development along Adelphi Tce, in distinct contrast to and with significant negative impact on the residences to the east and the level of amenity that is currently enjoyed by their occupants. The stated demand for high end tourist accommodation in SA is not justification for this development to be realised at this site at the height and density proposed. Similarly, testing the facade design and passive treatments against design /energy efficiency principles is a necessary part of the design process for the amenity benefit of future occupants. What might be interesting and appropriate design internally in new built form does not provide justification for the substantial visual and overshadowing impact arising of the length and height of the building.

The applicant is in effect asking the relevant authority to ignore many of the quantifiable provisions in the Development Plan which are built in to minimise the effect of inappropriate development such as the scale proposed. Representors should be afforded equal lenience to the prescribed measurements of what constitutes reasonable overlooking and overshadowing in order to appropriately address local perceptions of character and amenity. It is respectfully submitted that existing owners and occupiers expectations of residential amenity are afforded greater weight in the assessment than commercial and economic development in this instance.

The proposal does not adequately respect the amenity of its neighbouring Residential Character Zone and the off-site visual and overshadowing impacts are considerable to the degree that the proposal represents over development of the site. The site conditions – an allotment which is not much deeper than one or two conventional residential housing allotments – is not suited to a development of this scale in this locality. The Development Plan acknowledges these impacts could be expected within the zone itself, not neighbouring Residential Character Zone.

Conditions attached to any approval cannot overcome the off-site impacts on this neighbourhood arising from the height and scale of this development.

The future policy for this site is still under consideration and on behalf of Dr Miller, it is respectfully suggested that the application of this significantly large scale and density not be supported on this site at the interface with the Residential Character Zone.

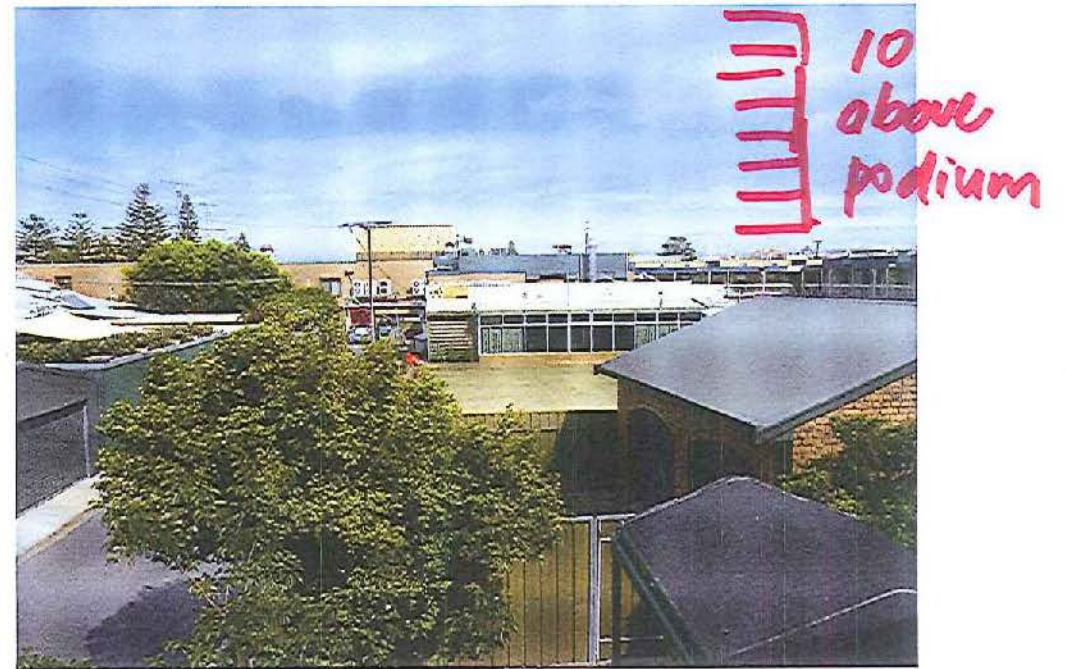
Yours sincerely



Julie Lewis  
**Senior Associate**

Enc Attachment 1-Site inspection Photos of land and locality 19 October 2015  
Attachment 2-Mark up of various views from site and locality





UPPER LEVEL - WEST OUTLOOK

1/7 Stuart St



GROUND LEVEL PRIVATE OPEN SPACE  
1/7 Start Street

APPROX. STURT ST OUTLOOK  
Intersection with George St



1/7 Sturt St



Canning St

Revision  
A-DEVELOPMENT A/R

Date  
14-08-2015

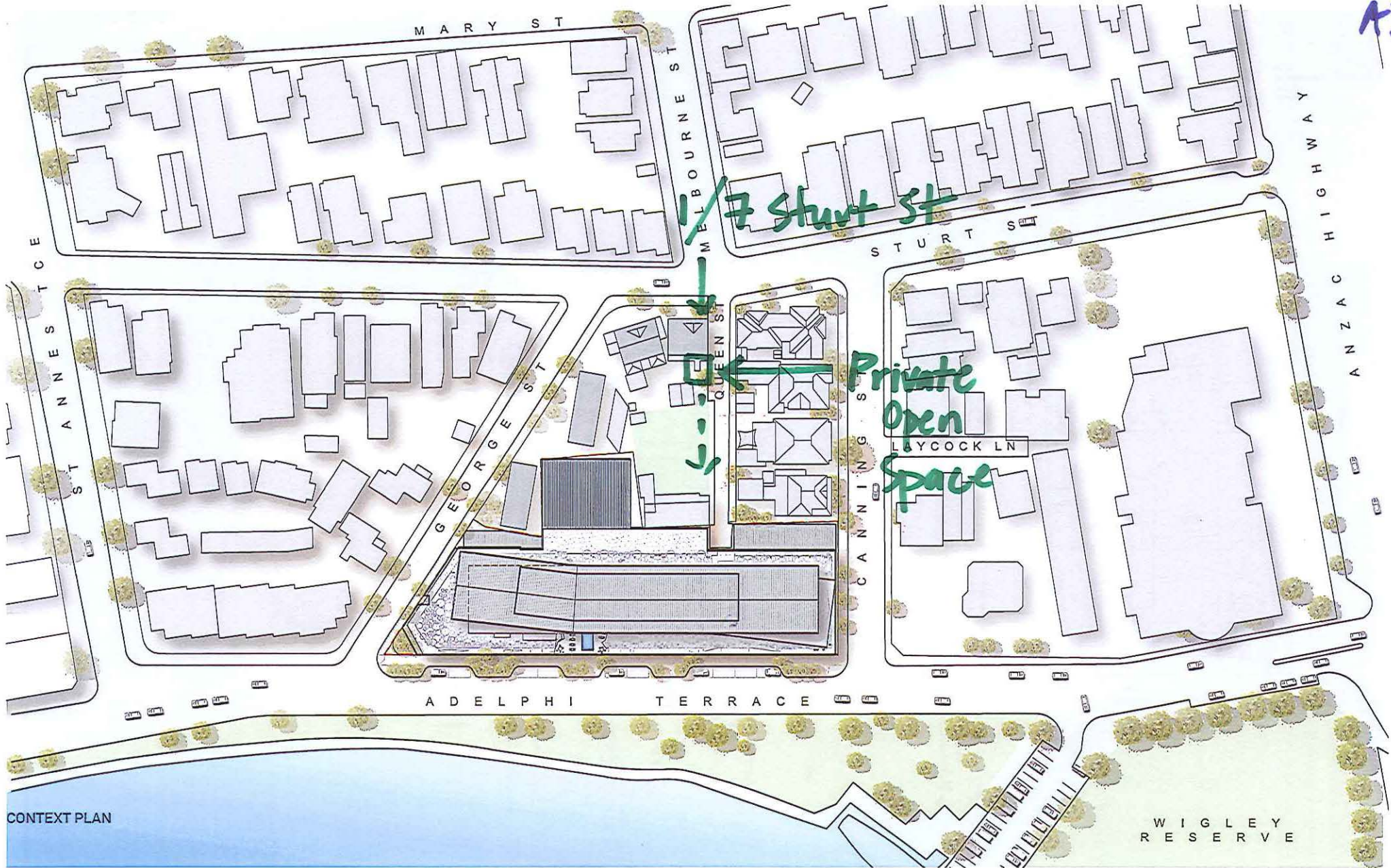
Scale  
NOT TO SCALE

Client  
Bruno Marveggio

Project Name  
Marina Regency Hotel &  
Apartments  
6-10 Adolphus Terrace  
Canning SA

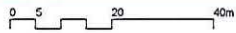
Drawing  
02-0102  
ARTIST'S IMPRESSION  
VIEW FROM CORNER OF  
CANNING ST AND STURT ST

A2



CONTEXT PLAN

WIGLEY RESERVE



Revision  
A - DEVELOPMENT APP.

Date  
14-08-2015

Scale  
1:500@A1  
1:1000@A3

Client  
Bruno Marveggio

Project Name  
Marina Regency Hotel &  
Apartments  
6-10 Adelphi Terrace  
Cleneilg SA

Drawing  
SK-0100  
CONTEXT PLAN

HASSELL

2

1/7 Street St



Revision A - DEVELOPMENT APP.

Date 14-08-2015

Scale NOT TO SCALE

Client Bruno Keneglio

Project Name Marina Regency Hotel & Apartments  
6-10 Adelphi Terrace  
Glennig SA

Drawing SK-6000  
SHADOW STUDY DIAGRAMS

EXISTING

PROPOSED



23 SEPTEMBER

0900HRS



1200HRS



1500HRS



23 SEPTEMBER

0900HRS



1200HRS



1500HRS



21 JUNE

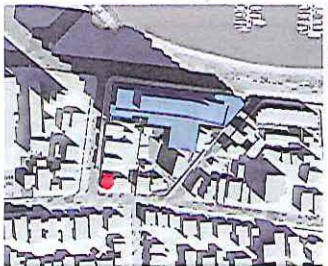
0900HRS



1200HRS



1500HRS



21 JUNE

0900HRS



1200HRS

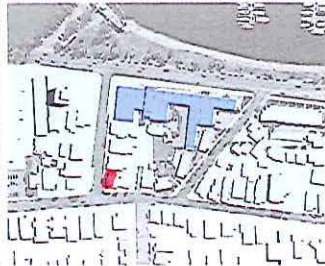


1500HRS



21 DECEMBER

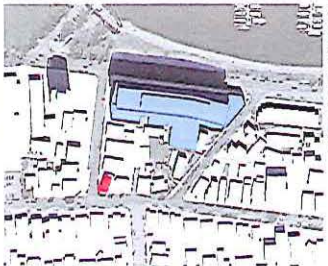
0900HRS



1200HRS

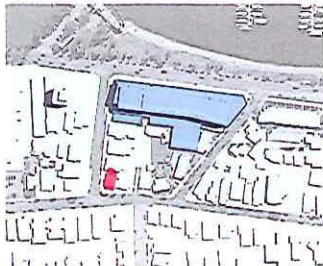


1500HRS



21 DECEMBER

0900HRS



1200HRS



1500HRS

5 Canning Street  
Glenelg North  
SA 5045

24<sup>th</sup> October 2015

Minister for Planning  
C/O Robert Kleeman, Unit Manager, Crown, Major Development & Grants  
Department of Planning, Transport and Infrastructure (DPTI)  
GPO Box 1815  
ADELAIDE SA 5000

majordevadmin@sa.gov.au

Dear Mr Kleeman

**6 – 10 ADELPHI TERRACE, GLENELG - INTEGRATED HOTEL DEVELOPMENT**

Please accept our written submission made in response to the Development Report released by Holmes Partners / Helen Dyer and Associates for the applicant Wunda Projects for the proposal at 6-10 Adelphi Terrace.

Section 46 of the Development Act 1993 (the Act) ensures that matters affecting the community to a significant extent are fully examined and taken into account. It is our contention that we are significantly impacted by this proposal and that there are achievable measures which the applicant can undertake to mitigate and or eliminate these impacts. Most, if not all, of these impacts would be greatly reduced or non-existent if this project had not been granted Major Project Status and had been able to be assessed against the City of Holdfast Bay's Development Plan.

In any event the Guidelines set out by the Development Assessment Commission request the applicant address (among other issues) the extent to which the proposal is consistent with the Council's Development Plan. This is an approach we also take in our submission in proposing compromise solutions for the scheme.

**1. Height**

Quite clearly the height of this proposal is seriously at odds with the heights set out in the current Development Plan. Even considering future State Planning Strategy Initiatives (Development Plan Amendments / Metropolitan Growth Projects) which involve investigating the impacts of raising the height limits of buildings in this area at some point in the future to 8 or 10 storeys, a height of 12 storeys is excessive.

The site is also located directly adjacent to a Residential Character Zone – Policy Area 14 Streetscape Character area which permits sensitive single storey development with two storeys generally encouraged at the rear of dwellings.

For every floor that is proposed the resultant impacts are compounded (the noise, traffic, overlooking, overshadowing and overbearing nature of the proposal).

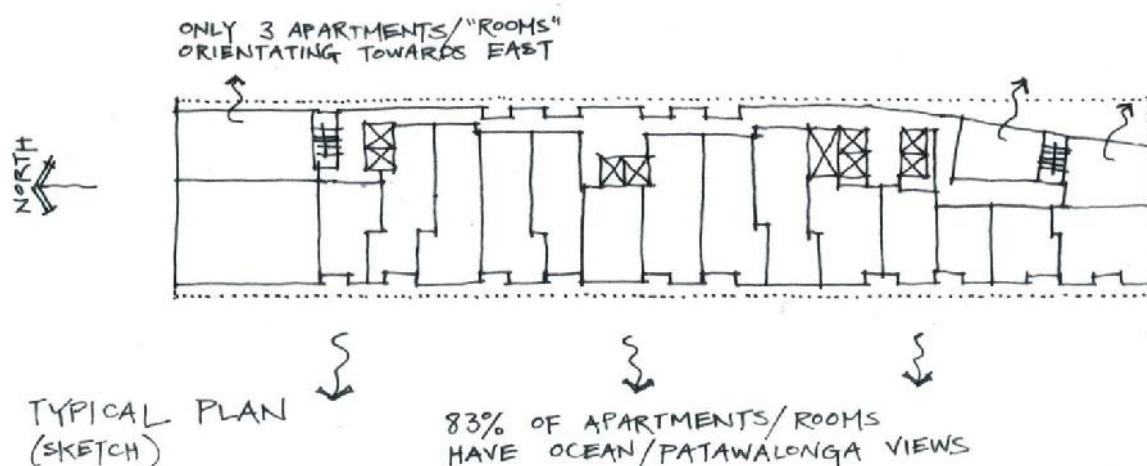
***We would urge the Department to consider limiting the height to a more reasonable (albeit still non complying) height of 6 storeys.***

## 2. Acoustic Impact

Our main area of concern is the acoustic impact of the proposal. The current documentation does not include an assessment of how neighbouring properties will be affected by noise emanating from the development – from the multi-storey car park (40m from our home), the internal and roof mounted plant, the swimming pool deck (which indicates an external pool bar on the eastern end of this floor level – 40m away), and most importantly (and worryingly) the 74 balconies which are orientated east, elevated (increasing the acoustic impact) and from within 45 meters of our home.

In addition, the form of the building itself (unbroken as it is) will act as a large reflecting surface reflecting any noise such as aircraft noise etc from the east back towards our property.

The acoustic impact of the balconies could be almost completely eliminated by orientating all apartments/hotel rooms to the west (providing them all with ocean and Patawalonga views) and accommodating the circulation on the eastern side (see sketch below).





This has benefits relating to overlooking as well as addressing acoustic issues. An internal rearrangement such as this requires minimal change to the external appearance of the building should this be desired by the developer. By accommodating the circulation to the east, residents of the proposal are still afforded eastern views whilst they circulate through the building. We would not consider these spaces to be sources of noise and our concerns would be addressed.

***We would urge the Department:***

- ***request the applicant reorientate all apartments to the west and accommodate the circulation to the east thus removing the majority of private balconies on the eastern elevation (see sketch above), and / or:***
- ***request the applicant provide sound attenuating surfaces to the inner face of all balconies and level 03 balustrading as well as to separating walls between balconies.***
- ***And impose the following conditions:***
  - ***That no sound shall be emitted from any machinery, equipment or device or from any source whatsoever on the subject land in such a manner as to contravene the EPA and regulations.***
  - ***The hours of operation of the pool bar / deck be restricted to the following times:***
    - ***9.00am – 9.00pm 7 days a week and shall not incorporate amplified music***
  - ***That an additional acoustic report shall be provided for consideration and approval, prior to Development Approval being issued assessing the effect of noise emanating from the balconies and pool deck area, the effect of noise reflected by the building (such as aircraft noise etc) and any treatments required to reduce all acoustic impacts on adjoining properties to acceptable levels.***
  - ***That no amplified sound shall be emitted from any device on the subject land so as to impinge upon the enjoyment of adjoining residents***
  - ***That all east facing windows shall be double glazed (75mm - 100mm cavity) to minimise noise impacts from the apartments/rooms on the adjoining residents.***
  - ***Noise associated with any element of the approved development shall not be audible from within any internal living area of any neighbouring dwelling***
  - ***That the applicant provide a Management Plan to the assessing authority prior to issuing Development Plan Consent which clearly demonstrates the procedures which are to be put in place to avoid noise impacts on neighbours such as limiting numbers of guests, signs***

***placed throughout the development reminding patrons and residents that they are in a residential area.***

- ***That the balustrading to the Level 03 eastern edge is a minimum of 1.7m above finished floor level and lined on the inner face with a sound absorbing material***
- ***That the landscaped areas shown on level 03 beyond the balcony and pool deck areas are accessible for maintenance only and not for general use and that details of fencing/balustrading be supplied to satisfy the assessing authority.***

### **3. Building Form**

The height proposed is not confined to just one area of the site but extends the full length from Canning Street to George Street, a length of approximately 120m. We understand the applicant has attended two Design Review Panel sessions and has received feedback with regards to the Design merits of the proposal but note there is no confirmation from ODASA within the documentation indicating their support of the current scheme. If we have missed this information, we would be grateful for direction to such correspondence.

Even if the overall form is supported, the comments of the Design Review Panel are able to focus primarily on exemplary urban design and design principals generally rather than considering such design outcomes in the context of all the other planning merits and specifically the impacts on local residents.



Whilst the language of the facades has been carefully considered, the mass of the proposal particularly from the eastern aspect, the Residential Streetscape Character Area (where there is greatest impact on the adjacent properties) still remains immense. (See CGI submitted above)

The design intent of stretching, squashing and shifting the striated forms results in a precarious and top heavy building with a “Jenga”-like appearance which increases the feeling of an overbearing form.

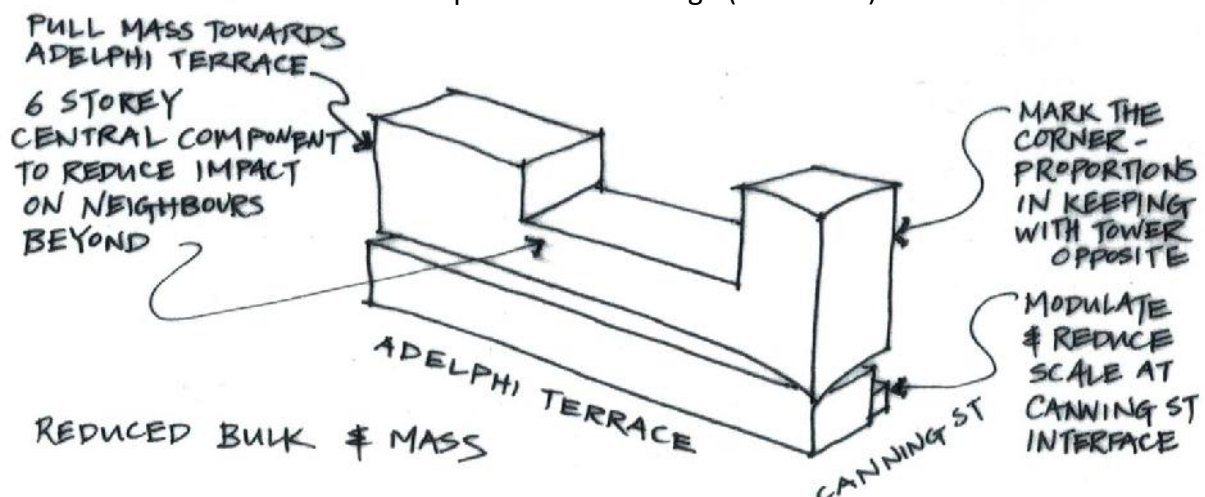


The architectural design report includes reference to large eaves which help sun control, large glazed areas to maximise views and a facade design which fosters strong visual connections. These may well be of benefit to the occupants of the building but there is little mention of how the design enhances the environment of its immediate neighbours.

In considering the effectiveness of the proposal it should not be overlooked that there are design solutions which will result in both a high quality architectural form as well as a proposal which would better address the surrounding properties ameliorating the impacts of such a large development on the neighbouring properties.

Examples might include:

- Providing a higher built form at one end of the site which is able to address both corners (a recognised urban design response) with a reduced building height along the remainder of the Adelphi Terrace frontage (see below):



- Breaking the proposal into separate building forms along its length fronting Adelphi Terrace which as well as better addressing the overbearing impacts of a single solid form, enable the building's functions (residential and tourism) to be more successfully separated.

***We would urge the Department to recommend the proponent explore breaking up the form of the building to lessen the impact of a single solid form – see sketch above. We would also urge the Department require the applicant receive full support of the Government Architect and Design Review Panel prior to granting approval. For a project to bypass the usual planning processes in this manner and since excellence in design can be subjective and difficult to quantify, the design must surely be independently verified as being of exceptional quality and the best design solution for the site.***

#### 4. Context

The proposal demonstrates very little reference to the existing context both with regards to building form and the materials and makes no attempt to bridge the scale difference between the proposal and the adjacent residences, particularly those on Canning Street.

We were unable to locate any streetscape elevations (possibly an indication that this aspect of the proposal has not been well considered) and have been referring to the shadow sections for comment in relation to Canning Street. The fact remains that the even the podium is 11m high and the 8m high boundary wall dwarfs the adjacent single storey property at 1 Canning Street. There is no evident attempt to bridge the transition between the 11m high podium and the scale of the adjacent residents and as a result the amenity of Canning Street (which sits within the Residential Character Zone – Policy Area 14 Streetscape Character Area) is negatively affected.

In the absence of any streetscape elevations, the image indicated here (right) shows a single storey building with an approximately 9m high wall on its boundary in Glenelg and demonstrates the failures of this kind of design approach both in terms of creating a cohesive streetscape and responding to its context.



This is worsened by the fact that some of the upper levels cantilever out to offer almost no setback to Canning Street at all. Such an overbearing, unsympathetic approach to street setbacks is neither envisaged nor consistent with the design intents of these zones and creates a jarring and unsympathetic imposition on the existing context.

***We would urge the Department to recommend the proponent submit detailed information relating to the streetscape and specifically how the transition is made between the podium and the adjacent residences. In addition it is our recommendation that increased setbacks to Canning Street be requested for upper levels as well as articulation and modulation of the form fronting Canning Street to better address the existing context.***

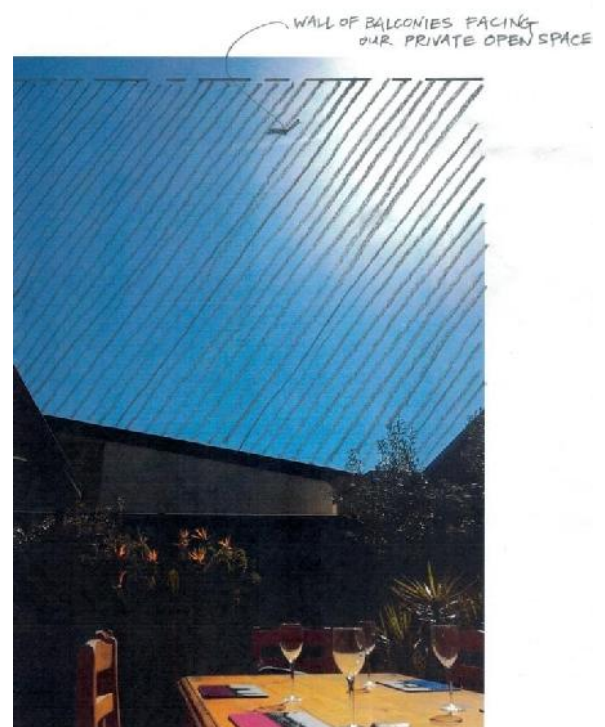
## **5. Overlooking**

We acknowledge the SA Design Guidelines in relation to guiding distances for overlooking and note that the City of Holdfast Bay's Development Plan uses 30m as a guide for windows but highlight the fact that no distance is referred to in relation to overlooking from balconies.

Residential Zone Principle 41 states that: *Where development is greater than single storey (excluding the Minda Incorporated Brighton Campus): (c) any upper storey balcony should be located and/or designed to avoid directly overlooking the private open space of adjoining residential properties and into habitable rooms (all rooms excluding bathrooms, laundries and hallways) of other dwellings.*

It is evident from this principle in the Development Plan that balconies should be treated differently to windows when assessing overlooking. Due to their open nature, balconies afford greater views for the occupant and for neighbouring properties, a keener perception of being overlooked.

We have minimal private open space which will be entirely overlooked by a wall of balconies. (see below photos of our courtyard which is designed with a western orientation)



In addition a number of the eastern balconies will have a direct view into our main bedroom.

It is unclear from the drawings whether the currently proposed “opaque upstands to 700mm” include the depth of the slab. If it does, we would argue that 500mm (which excludes the thickness of the floor slab) of opacity above finished floor level does very little to prevent any overlooking.

There are a number of ways overlooking can be addressed:

- 1) Orientate all apartments/hotel rooms to the west (ocean and Patawalonga view) and accommodate the circulation on the eastern side. This has acoustic benefits as well as addressing overlooking issues (as previously argued).
- 2) Provide an opaque angled screen or thickened profiled balustrade to the outer face of the balustrade to prevent downward views.
- 3) Provide an opaque balustrade to a minimum height of 1.1m **above floor level**.

We also refer to other high rise buildings in our area for cues in addressing the issue of taller buildings functioning next to areas of lower scale. We do not cite the following as exemplary in terms of their visual appeal and façade articulation but they all demonstrate an awareness and more sensitive approach to their neighbours than this proposal.

Not only are many of Glenelg’s buildings generally lower in height than that which is being proposed but these buildings all address overlooking in a more sympathetic way.



The Marina (5 / 6 storeys), the Oaks Pier Plaza (7 storeys) and the Platinum on the beach (8 storeys). None of these buildings are as tall as is proposed here and overlooking is addressed by orientating dwellings towards public open space.

Most of the high rise buildings dwellings in Glenelg address overlooking by orientating the balconies and main living areas to the “public” western side and only placing the utilitarian, non-habitable areas and corridors to the east where the adjacent existing residential properties are:

*5 – 11 Colley Terrace – 10 storeys:*



*From the west / public side*



*From the east – with residential properties in the vicinity*

*13 North Esplanade – 12 storeys:*



*From the west / public side*



*From the east – residences in the foreground*

*Aquarius Apartments 5 Adelphi Terrace*



*From the west / public side*



*From the east*

Even Oaks Liberty Towers creates less overlooking concerns for its neighbours. The eastern aspect commands a position which is first separated from adjacent buildings by a public street and then almost its entire length overlooks a car park and motel.



Incidentally the applicant may wish to amend the drawings and remove the images showing occupants of the tower block on their balconies peering through binoculars as this does little to appease residents' fears in relation to overlooking.

***We urge the Department either:***

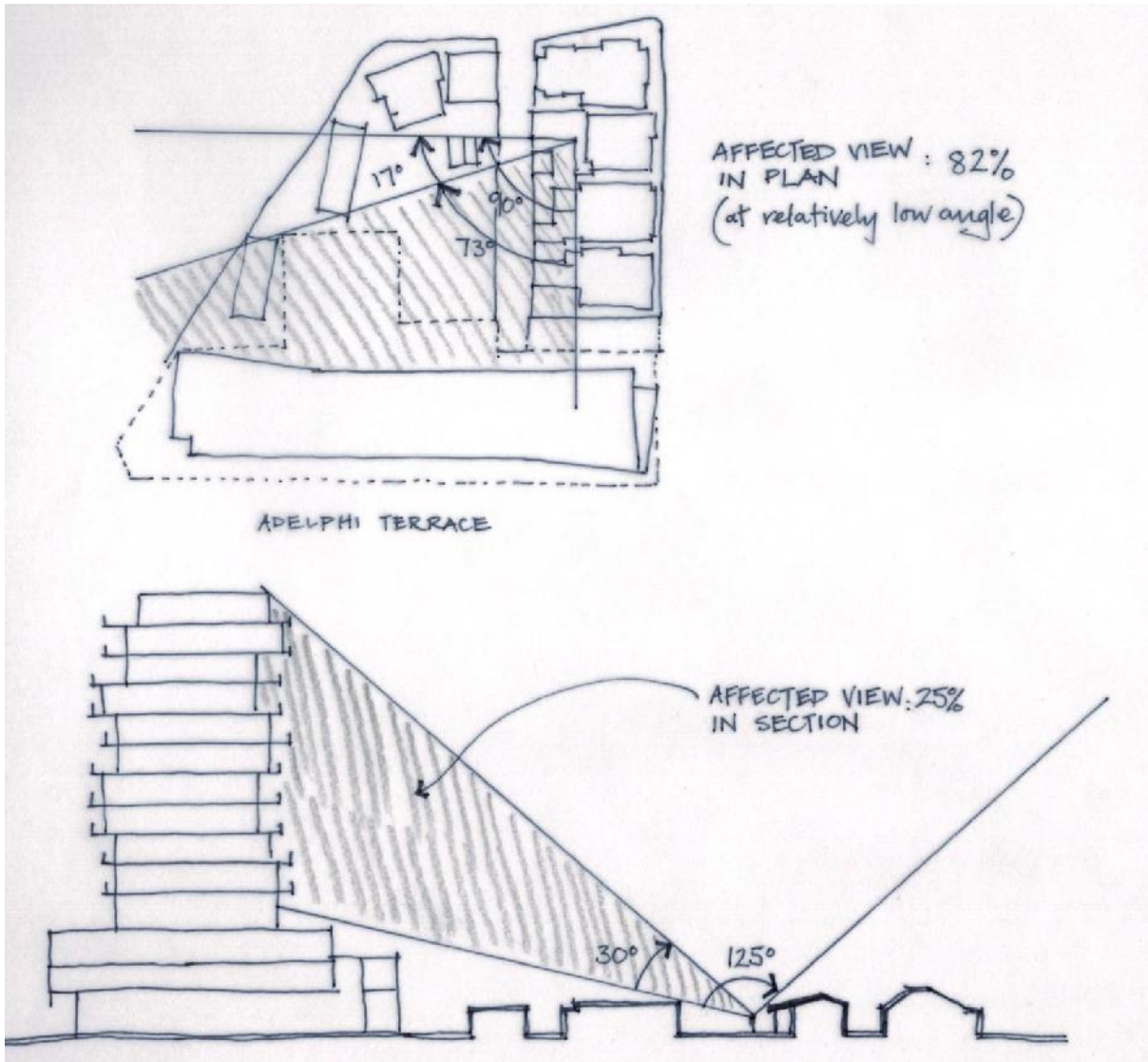
- ***request the applicant orientate rooms to face Adelphi Terrace - a technique employed in a number of local high rise buildings, or:***
- ***include a condition or require a change be made requesting the applicant provide angled screens/profiled balustrade edge to the outer face of the balconies to prevent downward views to the satisfaction of the Department:***
- ***include a condition ensuring an opaque balustrade be provided to a height of 1100mm (or at the very least 700mm) ABOVE FINISHED FLOOR LEVEL.***

## **6. View Study – the Effect of the Mass on Our Property**

Our home is detailed on View Study 02 (as prepared by the applicant) where it is suggested that 15% of our "view" is affected. We would be pleased for Department Workers to visit our rear private open space to gain a better understanding of the impact.

Our living areas open to the north and west. Our living area and main master bedroom (only completed in 2013) were constructed along our eastern boundary and have a westerly aspect. In reality (due to the height of our extension and verandah) the proposal will affect 30% of the view in section and 82% of the view from our private open space in plan. (See sketch overleaf and previous photos).





The photo below (taken of Liberty Towers on Colley Terrace) indicates the overbearing effect of a 12 storey building and gives a sense of what will be experienced from our private open space – for a length of 120m.



***We would urge the Department to consider limiting the height to a more reasonable (albeit still non complying) height of 6 stories and request the applicant break up the form of the building so it is not a continuous “block”.***

## **7. Land Use / Economic Viability**

The proposal details the residential/commercial split. It is our contention that a proposal which seeks to mix hotel and residential in a single development leads to greater impact on the surrounding properties due to the tensions which exist between these uses. Whilst on the face of it both hotel and private ownership seem complimentary uses in that they are “residential”, case history has shown that great tensions exist between these two uses. This has been demonstrated in the Courts (The Oaks Hotels & Resorts P/L v City of Holdfast Bay ERD 128/2009).

It is of note that the Oaks Hotel has recently been selling off its hotel suites to for private sale because of the lack of visitors.

If the applicant has been forced to demonstrate that this is a commercial development (to achieve Major Project Status) we would like it noted that we would much rather a purely / largely resident-owned component as it has been demonstrated that it privately owned dwellings are generally quieter and the residents more caring towards their environments.

## **8. Economic Impact**

In a typical Planning Application economic concerns would not be relevant to applications but as a Major Project one of the key assessment criteria is its economic impact.

It is tabled that this development is good financially for the State and if this is so, it is hard medicine for us to swallow when the value of our property has fallen by a suggested (estate agent estimate) \$100 000. Essentially we take a hit for the greater good of the State.

We can only silently submit our concerns in writing (no public hearing has been granted – unlike previous Major Project Developments) and hope the Department and applicant listens to our proposals for change, amendments and suggested conditions.

It may be submitted by the applicant that there is support for the proposal and that relatively few responses were received implying a proposal welcomed by the local community. This is not the case. Many residents are not submitting responses because of the inevitability of this development. Our immediate neighbours on Sturt Street have already moved out and those next door have put their house up for sale, two additional properties on Sturt Street remain empty, without tenants.

## 9. Additional Conditions

Finally in the absence of any information indicating possible conditions, we suggest the following:

- That the recommendations of the PT stormwater report be adopted
- That a dilapidation report including written and photographic / video footage of the internal and external of the adjoining residences including 5 Canning Street be prepared by a qualified structural engineer and provided to the assessing authority prior to the issuing of Development Approval.
- That the green walls and all landscaping proposed be established within 3 months of completion of the project and shall be nurtured and maintained in good health and condition at all times with any diseased or dying plants being replaced to the reasonable satisfaction of the relevant authority.
- That all external lighting of the proposal including car parking and buildings shall be located, directed, shielded and of an intensity so as not to cause nuisance or loss of amenity to any person beyond the site to the reasonable satisfaction of the relevant authority and shall not exceed the limits specified in the relevant Australian Standards.
- That all adjoining residents be informed should asbestos be located within the existing building and notified in advance of when the asbestos removal work is taking place
- All deliveries to and from the site (including waste collection) shall be restricted to the following times:
  - 7.00am – 7.00pm 7 days a week
- The hours of operation of the function room associated with the hotel shall be restricted to the following times:
  - 7.00am – 11.00pm 7 days a week
- The hours of operation of the retail units be restricted to the following times:
  - 8.00am – 6.00pm 7 days a week
- All loading and unloading of vehicles associated with the proposal shall be carried out entirely upon the subject land.
- All industrial and commercial vehicles visiting and site shall enter and exit the site in a forward direction.
- That should, in the opinion of a qualified telecommunications engineer, the development result in the shadowing of adjacent properties' TV antenna/signals, suitable antennae upgrades be offered by the proponent and all costs borne by the proponent.
- That all odours from the site (for example from kitchen/laundry/waste areas/retail units/swimming pool equipment etc) be emitted at roof level to avoid impacts on adjoining neighbours.

- That a final schedule of materials be submitted and approved prior to issuing of Development Approval demonstrating materials selected are not reflective and likely to cause nuisance to adjoining neighbours.
- That signs be installed in the car park and at exits from the building reminding the building's users that they are in a residential area and requesting courtesy and quiet.
- That construction shall take place between 7am and 7pm Monday to Saturday and not on Sundays or public holidays. All such work shall be undertaken in such a manner so as not to, in the reasonable opinion of the assessing authority, cause any nuisance or annoyance to any of the occupiers of buildings within the locality. Any work outside of these hours requires the written approval of the Department.
- That dust emissions from the site shall be controlled by a dust suppressant or by watering (subject to any relevant water restrictions) regularly to the reasonable satisfaction of Department.
- That the builder shall at all times provide and maintain a waste receptacle to the reasonable satisfaction of the Department on the site in which and at all times all builder's waste shall be contained for the duration of the construction period and the receptacle shall be emptied as required.
- That all hard building materials, waste and litter on site be stored in a manner that secures it on site during the construction works.
- That all mechanical plant and equipment including swimming pool filters and air conditioners, should be selected, designed, and installed to comply with the relevant EPA Noise Policy.

And conditions previously noted in the submission relating to acoustics and overlooking:

- That no sound shall be emitted from any machinery, equipment or device or from any source whatsoever on the subject land in such a manner as to contravene the EPA and regulations.
- The hours of operation of the pool bar / deck be restricted to the following times:
  - 9.00am – 9.00pm 7 days a week and shall not incorporate amplified music
- That an additional acoustic report shall be provided for consideration and approval, prior to Development Approval being issued assessing the effect of noise emanating from the balconies and pool deck area, the effect of noise reflected by the building (such as aircraft noise etc) and any treatments required to reduce all acoustic impacts on adjoining properties to acceptable levels.
- That no amplified sound shall be emitted from any device on the subject land so as to impinge upon the enjoyment of adjoining residents
- That all east facing windows shall be double glazed (75mm - 100mm cavity) to minimise noise impacts from the apartments/rooms on the adjoining residents.
- Noise associated with any element of the approved development shall not be audible from within any internal living area of any neighbouring dwelling
- That the applicant provide a Management Plan to the assessing authority prior to issuing Development Plan Consent which clearly demonstrates the procedures which

are to be put in place to avoid noise impacts on neighbours such as limiting numbers of guests, signs placed throughout the development reminding patrons and residents that they are in a residential area.

- That the balustrading to the Level 03 eastern edge is a minimum of 1.7m above finished floor level and lined on the inner face with an opaque sound absorbing material
- That the landscaped areas shown on level 03 beyond the balcony and pool deck areas are accessible for maintenance only and not for general use and that details of fencing/balustrading be supplied to satisfy the assessing authority.
- That opaque balustrading be provided to a height of 1100mm (or at the very least 700mm) **above finished floor level** to all east facing balconies and a height of 1.7m **above finished floor level** to the eastern end of the Level 03 pool area.

## **Conclusion**

The Design Guidelines Assessment criteria specifically includes “interface” as one of the criteria for assessment and we would hope that the applicant has a duty to consider the immediate neighbours’ concerns and then to demonstrate a compromise position which helps to ameliorate the impacts rather than standing firm and arguing their original position.

There are a number of very reasonable suggested amendments we have made and we look forward to the applicant’s response.

Yours sincerely

Jenny Newman BA (Hons) Dip Arch (dist) MA  
Gavin Newman MA VetMB CertVOphthal MRCVS

## Philbey, Janine (DPTI)

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**From:** DPTI:PD DAC & Major Developments Panel  
**Sent:** Monday, 26 October 2015 11:00 AM  
**To:** Philbey, Janine (DPTI)  
**Subject:** FW: Development Report submission Marina Regency

**Sara Zuidland**

Department of Planning, Transport and Infrastructure

Tel 08 7109 7060 | Fax 08 8303 0753 | Email [sara.zuidland@sa.gov.au](mailto:sara.zuidland@sa.gov.au)

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**From:** Vicky & Michael Corcoran [<mailto:mvc.eternity@gmail.com>]  
**Sent:** Monday, 26 October 2015 10:42 AM  
**To:** DPTI:PD DAC & Major Developments Panel  
**Subject:** Development Report submission Marina Regency

Minister for Planning  
Attention: Mr Robert Kleeman  
Unit Manager, Crown, Major Development & Grants  
Investment Management, Development Division  
Department of Planning, Transport and Infrastructure (DPTI)  
GPO Box 1815 ADELAIDE SA 5000

Dear Mr Kleeman

Glenelg being the premier tourist destination outside of the CBD is long overdue for a major development to attract increased tourism and provide imaginative residential accommodation with a 12 storey 4.5 Star Hotel.

There is a demand for residential apartment accommodation in South Australia and some changes would be beneficial to the apartment and penthouse floor plans at this early design stage.

On the typical suggested floor plans in the Development Report, the floor plans that have right angle glass walls are bedrooms. If possible, bedrooms would be better located in areas of standard glass walls as they are mostly occupied in the evenings? This would then allow the living areas and kitchens, which are occupied for long periods day and evening, to be located in the apartments where the glass meets at right angles, providing double views and maximum sunlight. Good timing as floor plans are being drawn up, to consider plumbing and services for kitchen, laundry and bathrooms. On typical floor plans, bathrooms are fairly spacious. If bathrooms were made more compact the additional floorplan space could be used in living rooms with open plan kitchens and laundries incorporated?

Understand absolute limitations of where the front door is located in apartment corridors. As bedrooms can be adjacent to front door areas, (for example, with a 1.1 m wide passage leading to the living rooms) if view and orientation is preferable and especially if the room has right angle glass walls. This passage from the front door could have a 35 cm storage wall with sliding doors to create an illusion of width and reflect light, and provide essential storage where an apartment generally has minimum storage. As the imaginative design of Marina Regency has glass on all the exterior walls, we also suggest all the bedrooms, kitchen and living areas have double doors to increase ventilation, and all important access from rooms to balcony. These doors we recommend in addition to the operable window facades. As it may not be practical in hotel guest apartments, please consider if maximum sliding doors could be installed in residents' accommodation ?

From an interior designer's perspective, neutral cream colors if used throughout are of benefit for 2 reasons. Neutral cream does not date, and specific fashion colors can be used in soft furnishings.

We sincerely hope our ideas are of benefit and wish you enormous success with such a fine project.

M and V Corcoran

**Response to Development Approval for Hotel at Adelphi Terrace Glenelg North. 26/10/15**

I have listed below comments and areas of concern in relation to the Development report of the proposed hotel.

**Commercial Tourism Precinct Designation** - Ref 6.2.2 of the report shows that Sturt St and Tod St are included in a Commercial /Tourism Designated area. This is clearly misleading and suggests the development is affecting only an area that is already commercially zoned. The only infrastructure that could be designated as Commercial in this area is the Watermark Hotel Car Park at the corner of Anzac Highway and Sturt Street. There are no other commercial enterprises, businesses or tourist attractions in these streets which are zoned character residential.

**Non ozone depleting refrigerants** - Ref 5.7 Can the developer advise **which 0 ODP refrigerants** are being used as there is currently nothing commercially available other than hydrocarbons which pose serious flammability concerns.

**Wind Ratings** - Ref 5.13 of the report says that any increase in wind speeds at ground level are “**unlikely**” but does not say there will not be an increase in wind speeds at ground level. The report suggests wind speeds will be below 8-10M/s for 95% of the time but does not mention the impact when the wind speed is in excess of this. This will be when the impact of wind will be highest so there should be a section of the report including the impact of wind at these extremes.

**Urban Form Relationships** - Ref 6.23 The proposed development sets a precedent in Glenelg by the location directly in front of a low rise residential area. The report concentrates on the podium level relationship to adjacent properties but only draws comparison with high rise developments in the area citing the neighbouring Aquarius apartments as an example. This building has a much smaller horizontal mass and does not have a comparable amount of residential properties adjacent to it therefore has a minimal impact on adjoining properties. Other large structures have such as Holdfast shores and the Grand Hotel have car parks, marinas or public open space behind.

Importantly the Aquarius apartments have no Eastern facing balconies.

**Overlooking** Ref 6.31 The development says there are no windows overlooking properties to the East at Podium Level. However windows to the North and East of the property will have access to overlook private open spaces in backyards on the North Western side of Sturt Street. Also most levels of the tower on the Eastern side are close to and will overlook these properties.

This is a major concern. At the Public meeting one of the designers stated she was looking at a design where the residents in apartments would have more of an outward look towards the Hills rather than a downwards aspect to adjacent residences. Idea was possibly a garden area close to the balcony so residents could not stand on the edge and look downwards. Otherwise a higher opaque glass balcony or wings on ends of balconies may achieve this. If the design is approved in it's current form I believe the developer should either modify plans to eliminate overlooking of adjacent properties or bear corrective costs to local residents affected by overlooking of back yards if they desire to screen out the views of the tower. As a local and potentially affected resident I feel that I should not be financially penalised in having to screen out the tower. Ironically I wanted to put a 2<sup>nd</sup> storey balcony at the rear of my home to take advantage of views to the Marina down George Street. I would have been allowed to do so if I put an 1800mm solid wall at the front of the balcony to avoid looking at the 2 storey units and solid wings either side so I couldn't overlook next door.



Changed days indeed! The views from the Northern and Eastern side of the development in particular are a major issue for me.

**Overshadowing** The report is very selective in the timeframes for overshadowing examples. The last one being at 3pm. To show the full impact of overshadowing examples have to be provided later in the day. 6PM in Spring, Summer and Autumn will provide a very different picture with enormous shadows shading out this pocket of Glenelg North, therefore having a significant impact on the outdoor lifestyle currently enjoyed in adjacent backyards in the warmer months.

**Parking** The homes in adjoining Streets are typically pre-war cottages which by their nature have very limited parking spaces. The parking spaces in Sturt, George and Canning streets are used widely by residents to park their own or second vehicles. It is already currently difficult in the summer months to get or keep a park, and especially in the construction phase this would result in a huge amount of inconvenience to local residents given the amount of workers in the area. Permit parking should be available for local residents affected through the construction phase, and also be considered (a reasonable radius around the area) post construction due to the increased traffic.

**View Sheds from residences** 6.33 Very selective examples have been given to minimise the impact of the Development on local residents. Perhaps an example of someone sitting on their 2<sup>nd</sup> Storey balcony at the rear of 11 Sturt St directly facing the Development will paint a dramatically different picture? The impact of losing views of the sky will have a very serious lifestyle impact on residents and detracts dramatically from the 'beachside' natural feel of the area which defines the character of Glenelg.

**Scale relationship** 6.34 "This is indeed the character of Glenelg" is a ridiculous statement. Comparisons drawn between other towers and other large buildings in the area are a common theme of the report. There is a major focus on the scale relationship of the **podium** with other residences while understating the scale of the tower. The podium is hardly an attractive addition to the area and is consistently used in the report as the main interface to local homes. This development will be akin to having a large cruise ship moored next door. Unfortunately unlike a cruise ship it will still be there in the morning. The height of the development and the horizontal scale are at odds with the area and will provide an overbearing feel to homes and have a serious lifestyle impact on residents. The report reads like there is a Harry Potter cloak of invisibility over the tower.

**Desired Character** Ref Page 71 The crux of the report is summed up by the conclusion that residents in this area should expect to lose on street car parking, private open space and privacy in their own backyard and overshadowing should be an expected consequence of development in an area zoned character residential? This is not the character residents I have spoken to "desire". I believe this site should be developed as the existing hotel is very tired. If the overall width and height of the development was reduced in scale, and provisions were included to eliminate overlooking of adjoining residences I would be supportive of the Development.

Integrated Hotel Development  
Adelphi Terrace  
Glenelg SA 5045



David and Diane Zubrinich  
U3/7 Sturt Street  
Glenelg SA 5045  
0419 818 786  
Email: dizubrinich@gmail.com

23 October 2015

Attention: Minister Of Planning  
Mr Robert Kleeman  
Unit Manager, Crown, Major Developments & Grants  
Investment Management ,Development Division  
Department of Planning, Transport And Infrastructure (DPTI)  
GPO Box 1815  
Adelaide SA 5000

Dear Robert Kleeman

My name is David Zubrinich my wife Diane and I have lived at 3/7 Sturt Street for 20 years. We worked so hard and saved so hard so we could live in what we call our dream house in Glenelg, which is the best place that we know. We both have some concerns with the new development especially with the height and the fact it goes from Canning Street to George Street which is massive. The overshadowing in our yard means we will have no sun after 1pm. We will have people looking into our yard every day. There will be noise from people on the Balcony's so there will be no peace at night. The lights from the complex will be all we will see at night. The Car park for the complex is going to be massive but that is only for people who live and are staying at the hotel what about people that come and visit people in the complex we have problems already in our street with parking. If you would like to come to our house and have a look at our concerns you are most welcome to come. Please note we are not against new developments but we do think this building and car park are just too tall. I wonder if this is more about the people who are building the complex making a lot of money to put in their own pockets by making it this height rather than the concerns of people in this area.

Yours sincerely

David Zubrinich

A handwritten signature in blue ink that reads "D Zubrinich".

## Philbey, Janine (DPTI)

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**From:** DPTI:PD DAC & Major Developments Panel  
**Sent:** Tuesday, 27 October 2015 3:54 PM  
**To:** Philbey, Janine (DPTI)  
**Subject:** FW: Development Report submission Marina Regency Glenelg North

### Sara Zuidland

Department of Planning, Transport and Infrastructure

Tel 08 7109 7060 | Fax 08 8303 0753 | Email [sara.zuidland@sa.gov.au](mailto:sara.zuidland@sa.gov.au)

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**From:** Sue M [<mailto:susmarm10@gmail.com>]  
**Sent:** Tuesday, 27 October 2015 3:53 PM  
**To:** DPTI:PD DAC & Major Developments Panel  
**Subject:** Development Report submission Marina Regency Glenelg North

Minister for Planning  
Attention: Mr Robert Kleeman  
Unit Manager, Crown, Major Development & Grants  
Investment Management, Development Division  
Department of Planning, Transport and Infrastructure (DPTI)  
GPO Box 1815 Adelaide SA 5000

Dear Mr Kleeman

The attractive cantilever design of 12 storey Marina Regency Hotel will provide Glenelg North with accommodation for residents and tourists which has been needed for some time. It will bring life to Adelphi Terrace replacing the old Comfort Inn.

### Balcony design

Architects have designed a unique complex with cantilever incorporated horizontally. As part of the attraction of Marina Regency are the outstanding views, could consideration be given to the solid base of the balcony being reduced to about one-third solid and about two-thirds glass? Partial views would be blocked from inside and outside of the apartments with the current 3D concept on a 1.2 metre wide balcony. Overall, a 1.2 m height balcony is a suitable height for safety. A suggestion for reducing the height of the solid base will still achieve the stunning horizontal lines of Marina Regency Hotel.

### Strata Corporation

As planners and architects of Marina Regency have physically separated the hotel areas from the residential apartment accommodation, this will be of benefit as it conforms with the Strata Corporation being separate from the Hotel.

It would be of benefit to all concerned if the format and costs of the Strata Corporation be documented for intending buyers prior to purchase and be included in the Development Report, referred to in the Proposed Major Tourist Hotel Redevelopment. The swimming pool on the podium level is an interesting inclusion.

### Apartment floor plans

From a design perspective, if possible, all rooms including bedrooms on outside walls should provide direct access to balconies with sliding doors, so the views can be enjoyed.

Looking at the examples of apartment designs, the kitchens are comparatively small for everyday living. By comparison, bathroom and bedroom sizes could be reduced especially for owner occupied apartments to allow larger kitchens and family rooms on the floor plans.

### **Materials and finishes**

Also, for apartments a choice of flooring and internal finishes would be advantageous.

### **Further refinement of design**

As the Development Report acknowledges 'that further refinement of the design may be anticipated as a result of the Development Report public consultation process as well as arising from further design debate', could my suggestions as above be included in this process..

Thank you.

Hoping this much needed facility goes ahead.

Yours sincerely

S M Melville

Minister for Planning

Attention Mr Robert Kleeman

**Re: Adelphi Terrace Glenelg-Integrated Hotel Development**

I am the owner and occupant of a property at 14A Sturt Street Glenelg North SA 5045.

I wish to make a submission with respect to the proposal to construct a new 12 storey building on the Comfort Inn site at Adelphi Terrace Glenelg.

My comments are as follows and refer to the provisions of the *Holdfast Bay Council Development Plan*.

**Streetscape and public space**

The Desired Character statement for the Urban Glenelg Policy Area 15 states:

*Development ..will create design relationships between buildings at ground level and the street frontage that acknowledge and respect the existing context.*

and

*Building form and setbacks will vary to provide large-scale articulation within the streetscape.*

I consider that the scale of the building and the lack of any building setback at ground level along the Adelphi Street frontage do not respect the existing pattern of setbacks and building articulation which currently includes public/private outdoor dining spaces and decks. There is a lost opportunity to create new outdoor spaces by varying the building setbacks. Instead the proposed development relies on using the existing narrow footpath and new parking lane protuberances for outdoor dining area, and does not make any contribution to the local streetscape and public realm.

*Landscaping will contribute to the high quality of the adjacent public areas, open space and streetscapes*

There is no landscape contribution to the streetscape or public realm in the locality. Any landscaping is located on the podium level.' Green walls' cannot be considered to be a substitute for appropriate street level landscaping, and are not a sustainable design solution in a coastal environment.

**Overlooking and overshadowing**

Principle of Development Control 6 states

*Building design should minimise the impact of overlooking and overshadowing on existing lower density and scale development in adjoining zones/policy areas/precincts.*

I consider that the building will have unacceptable impacts on the neighbouring properties in the adjacent residential zone to the east, due to the scale and orientation of the building. There will be

an unacceptable loss of access to afternoon sun over a large area. The applicant should be required to provide modelling of the shading impacts of the proposed building.

**Car parking**

Principle of Development Control 15 and 16 states:

*Development should provide car parking within the zone in accordance with Table HoB/1 – Off Street*

*Visitor car parks should be designed and located to ensure they are accessible 24 hours of the day by the prospective visitors.*

The applicants should demonstrate that these requirements have been met, as on-street parking is at full capacity in the adjacent residential streets on weekends and other high use periods.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Pauline Middlemiss', written over the typed name below.

Pauline Middlemiss

## Philbey, Janine (DPTI)

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**From:** DPTI:PD DAC & Major Developments Panel  
**Sent:** Wednesday, 28 October 2015 9:22 AM  
**To:** Philbey, Janine (DPTI)  
**Subject:** FW: Submission - Adelphi Terrace, Glenelg - Integrated Hotel Development

### Sara Zuidland

Department of Planning, Transport and Infrastructure

Tel 08 7109 7060 | Fax 08 8303 0753 | Email [sara.zuidland@sa.gov.au](mailto:sara.zuidland@sa.gov.au)

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**From:** G Leyson [<mailto:Graham.Leyson@outlook.com>]  
**Sent:** Tuesday, 27 October 2015 9:41 PM  
**To:** DPTI:PD DAC & Major Developments Panel  
**Subject:** Submission - Adelphi Terrace, Glenelg - Integrated Hotel Development

882

P.O. Box

GLENELG  
S.A. 5045

27 October 2015

Minister for Planning  
Attention: Mr Robert Kleeman  
Unit Manager, Crown, Major Development & Grants  
Investment Management, Development Division  
Department of Planning, Transport and Infrastructure

Via email: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Sir,

### **Major Development – Response to Development Report Adelphi Terrace, Glenelg – Integrated Hotel Development**

I believe the Development Report in relation to the above Development is deficient in that it contains a major error of fact on page 3 of Appendix 7, Traffic and Parking Report – Parking Design and Traffic Assessment.

The report states that “**Adelphi Terrace** functions as a collector road under the care and control of the Holdfast bay Council. The road **comprises two traffic lanes in each direction,**”

In fact Adelphi Terrace comprises only **one traffic lane in each direction.**

Also the report quotes traffic densities and numbers from old 2012 Council traffic data.

Since 2012 there has been a visibly significant increase in traffic on and around Adelphi Terrace. Currently afternoon “peak hour” traffic on Adelphi Terrace often banks up from the busy Anzac Highway corner traffic lights past the proposed development site to as far back as the King Street Bridge. Weekends create a similar but more constant traffic issue on Adelphi Terrace combined with dense bicycle traffic as well as busy tourist/event pedestrian traffic.

It is a little known fact that **Adelphi Terrace** forms part of the important emergency alternative Western Adelaide North-South corridor in the event of an incident at Adelaide Airport.

I quote the following excerpts from various SA Government sponsored reports:

“... when there have been incidents on Tapleys Hill Road, in the vicinity of the airport, access and egress to and from the airport via Military Road, King Street Bridge and **Adelphi Terrace** has been one of the preferred options to maintain the operations of this significant piece of transport infrastructure that in turn, is a major economic driver for the region and the State.”

“... We envisage that the King Street Bridge (*and hence Adelphi Terrace*) would be an essential access and egress for emergency service and support vehicles.”

“... King Street Bridge is located between **Adelphi Terrace** and Patawalonga Frontage at Glenelg. .... Its role in the “collector” road network west of Adelaide Airport represents an important north-south network for local, metropolitan freight and business, public transport and tourist route traffic. This network in turn is critical in complementing the optimum functionality of metropolitan Adelaide’s key freight routes and employment and export hubs. King Street Bridge (*and hence Adelphi Terrace*) is particularly critical as a diversion and ‘pressure-release’ route, in risk and emergency scenarios, when key north-south arterial routes adjacent and servicing the Adelaide Airport are unusable.”

**Current SA Government policy is to balance the growth needs with the needs of protecting traffic and freight movement.**

This development has the potential to create huge traffic and safety issues by further increasing traffic volumes on Adelphi Terrace, a road restricted to a single lane in each direction.

This, combined with the already heavy tourist and local pedestrian presence in the immediate vicinity of the proposed development (as well as the usual seasonal influx of visiting beach goers and young families from surrounding areas), will significantly increase the risk of serious road and footpath accidents.

Based on the above, I therefore do not support the proposed development.

Yours faithfully

Graham Leyson  
[Graham.Leyson@outlook.com](mailto:Graham.Leyson@outlook.com)



26 Sturt Street  
Glenelg North 5045

27 October 2015

Minister for Planning  
C/O Robert Kleeman, Unit Manager, Crown, Major Development & Grants  
Department of Planning, Transport and Infrastructure (DPTI)  
GPO Box 1815  
ADELAIDE SA 5000

[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

6 – 10 ADELPHI TERRACE, GLENELG - INTEGRATED HOTEL DEVELOPMENT

Dear Mr. Kleeman

*Please find following our submission in response to the Development Proposal Report for the site at 6-10 Adelphi Terrace. Due to the large volume of documents to read through, limited time was left for formulating a response so please excuse the somewhat disjointed dot point like composition, which roughly follows the issues in order of appearance in the report.*

**Need for the proposal:**

*If South Australia is experiencing contractions in almost all industry sectors including the accommodation and food services sector it doesn't make sense to say that creating additional accommodation and food service will turn this around. Glenelg is already extremely well serviced with an exceptional number of restaurant options on Jetty road and the nearby marina development. Restaurants and shops on Jetty Road regularly open only to close within very short periods of time, which seems likely to be due to the high level of competition in the immediate vicinity or lack of demand. It seems unlikely therefore, that visitors to Glenelg will see the need to cross Anzac Highway to visit a few more shops. Local residents have only a short walk to Jetty Road or the Marina to have their choice of almost any style of cuisine and are unlikely to benefit from the replacement of the existing Plank Restaurant with another.*

*There are numerous bars within a short walk whose patrons and noise levels do not impact on our residences due to their location facing Anzac Highway or public areas away from the residential zones. There are over eight gyms in the nearby vicinity*

*making the appeal of another one negligible for local residents - we already experience a high level of “depth and breadth of services and facilities” of all types.*

*There is nothing to demonstrate that this development is a logical extension of the Holdfast Bay precinct. The Marina development however, is a logical continuation of the foreshore – people can walk along the beachfront without crossing the busy highway and there is an abundance of restaurants and attractive vistas when you arrive. The Comfort Inn sits alone and is not in itself a tourist destination whilst the Marina is just that. There is no need to “provide increased connectivity between the Patawalonga, Holdfast Shores, Colley Reserve and Jetty Road” other than to draw customers to Mr. Maraveggio’s business.*

*In terms of the need for additional private apartment living, at the time of writing there are over 35 apartments available for sale in the Holdfast Promenade development and around 80 in total within the immediate vicinity, all of which enjoy superior views and are more closely located to the amenities at the heart of Glenelg. The Adelphi Waters development slightly north of this site on Adelphi Terrace provided extremely well appointed high-end accommodation with superb views of the Marina yet it took well over two years to sell all of the apartments after substantial discounting and the development becoming known locally as the White Elephant. The new development will outdo the existing ones in terms of the modernity of its amenities but its location is separate from other points of interest and access is less convenient.*

*Apparently the project is “shovel ready” due to investment from offshore so it is certainly attracting foreign investment into the State’s economy but one then assumes that the revenues will be returned to the investors again not really showing how this will provide benefit to the local community. We assume here that “local community” refers to the people who live here, not the people who own businesses here and live elsewhere. It will most definitely create several hundred short-term jobs but what guarantee is there that those jobs will be available to Australian residents?*

*It has not been possible to verify the occupancy rate of other accommodation venues in the location but some are selling off their units to private owners due to the downturn in occupancy and the difficulties experienced when letting rooms to holiday making groups of guests. To simply state that there is a need for this development is not proof that there is a need and we hope that the so-called facts in this document are verified independently.*

**Potential Dis-benefits:**

*The “dis-benefits” to the local community have been recognised and dismissed in one short paragraph using descriptors such as “minimal impact” and “limited*

*overlooking". The issues most certainly have not been addressed by the design of the building – we will have more than 70 balconies facing our home and our bedrooms. It is not minimal impact on views when it obscures the view of the sky from our dwellings and creates shade for some for more than 50% of the day.*

*Sadly stripping of our privacy is not the only loss we will experience with some residents being advised that their property is likely to be devalued in the order of around \$100,000. There is no reference to compensation for this or for the disruption, inconvenience and noise we will experience during a 2.5 year demolition and building phase.*

*Another substantial "dis-benefit" is that the presence of asbestos containing material (ACM) in the existing building has not been ruled out. In fact, it was stated that it was likely that there is asbestos in the roofs but no effort was made to undertake a thorough analysis as though environmental contamination is insignificant. Many of the nearby homes are around 100 years old with poor resilience to the entry of dust and other airborne contaminants. We have no way of protecting our home from the ingress of asbestos containing dust or protecting our garden soil from being permanently contaminated – this has not been addressed in the document in any way, and by not ruling out the possibility of its presence, has created anxiety for anyone within the nearby area.*

**Consequences of not proceeding:**

*The consequences of not proceeding with this project are significant for Mr. Maraveggio and his investors. Not one other person will feel disadvantaged if the project does not proceed.*

**Wider Glenelg context:**

*"Most properties are built to the existing height and density capacity reflecting the popularity of the locality". Apparently the local zoning permits buildings to a height of between 3-5 stories yet this proposal seeks to erect a 12 storey building – more than four times the height of currently accepted development. It seems therefore, that it is not within current zoning permissions. Zoning permissions are to be subjected to review after (one hopes) public consultation. To pre-empt the review by allowing a 12 storey development to proceed would make a mockery of any zoning review consultation process, as it would indicate that the outcome is assumed.*

**Artist's impressions:**

*We note that the artist has provided impressions at a significant distance – from*

*both of the narrow ends of the building, minimising its visual impact and in no way representing the view of residents of George, Sturt or Canning Streets. Views from King Street Bridge and Anzac Highway traffic intersection show what a motorist might quickly observe from the distance and are hardly indicative of the impact of the building on more permanent observers such as the local residents.*

*We also note that throughout the report there is no mention of the impact on properties on Sturt Street being the nearest adjacent street to the east. Why has this not been considered at all?*

### **Sustainability:**

*The report goes into great detail about how the inhabitants of the new hotel will be protected from external noise, experience superior ventilation options, have tinted windows for sun and glare protection but make no reference to how external local residents will be protected from the noise of the building plant, delivery and collection truck noise, noise of the residents on their balconies, parties by the pool, or how we will be protected from the glare from 9 plus levels of glass walled apartments reflecting sunlight throughout summer, or the ambient lighting levels at nighttime interrupting the quality of our sleep in bedrooms that face the development. Like many of the other nearby residents I am sure, we do not have the option to relocate our bedroom. Once again the aspect of how noise control levels will be met has been left out of the report to be addressed at a later date. Perhaps they already know that it is not possible to achieve satisfactorily low noise levels with all of the plant that is to be located on the roof.*

*Documents refer to good design in terms of sustainability however make no reference to utilising solar power which would seem like an obvious option for a building with such a massive footprint and rooftop.*

### **Traffic and parking:**

*“MFY Pty Ltd has been engaged to undertake a parking design and traffic assessment for the proposed mixed-use redevelopment of 6-10 Adelphi Terrace, Glenelg.” The veracity of information provided in the assessment is somewhat questionable when the opening sentences describe Adelphi Terrace as comprising “two traffic lanes in each direction, with added bicycle lanes in each direction”. It seems that they have not even attended the location as Adelphi Terrace clearly has only one traffic lane in each direction. While hardly a significant oversight it does call into question the truth in any of their observations.*

*There are four plus pages of theoretical traffic rates that conclude with the following sentence “Given that the forecast additional trips relating to the subject development*

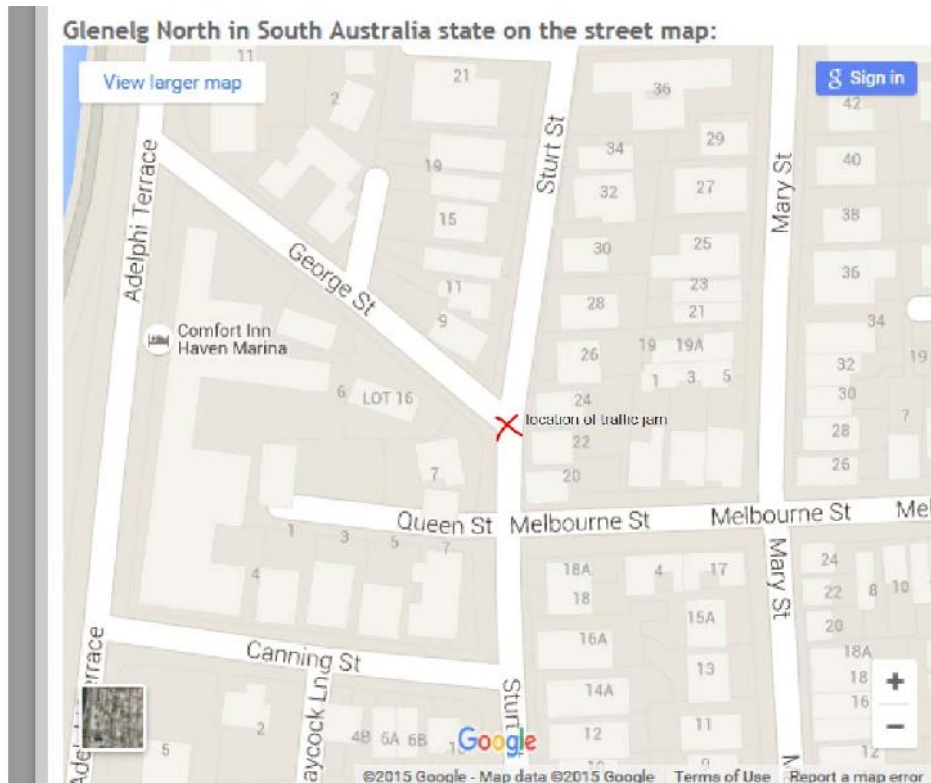
*will be relatively low, the access of the on-site car park with George Street will operate satisfactorily.” With a building at least three to four times the capacity of the current hotel how do they arrive at a relatively low increase in trips? Traffic that was previously handled by six crossovers will now all be funneled down a narrow side street to be handled by one crossover with a significant increase in the number of users. This is likely to result in queuing and traffic jams as people cannot exit in their chosen direction due to parking on both sides of George Street making it virtually only one lane wide.*

*Parking restrictions cannot be introduced here as many local residents do not have off street parking available and need to park on the street. We have only lived here for just over a year but have quickly learnt that if we are going to have visitors that we need to park our car on the street in order to ensure a parking spot in our driveway for our guest. Not all of our neighbours are lucky enough to have off street parking and could be faced with the option of not having somewhere to park when they arrive home from grocery shopping on a Saturday morning as fulltime working people often do. MFY have obviously not witnessed the existing traffic situation in this area when all of the surrounding streets are consistently fully parked out on weekends creating a situation where owners find it difficult to park outside their own house. There has literally already been traffic jams at the intersection of George, Sturt and Melbourne Streets in the last couple of months when we have experienced nice weather (see following picture of typical weekend parking).*

*This is created in part by the lack of parking spaces in Glenelg and in part by the fact that this area is the closest area with unrestricted parking. The situation will only be exacerbated by the provision of minimum parking for hotel residents and guests. If the parking in the development is free, it will fill up with people parking to go to Jetty Road and if there is a fee associated then guests to the new hotel will park in the surrounding streets. George Street was not designed to manage this kind of traffic flow – it is a short street and likely to result in traffic queuing on to Adelphi Terrace and/or Sturt Street in either direction during peak times making overtaking impossible, ingress and access to local homes difficult and increasing noise and pollution levels from idling car engines. It looks as though the traffic assessment has been done from the office rather than observing the actual situation on the ground. George Street is set at a substantial angle to both Adelphi Terrace and Sturt Street making it difficult to observe approaching traffic when making right or left hand turns from George Street especially when the streets are lined with cars. This is an area where residents regularly walk with their pets or with small children riding pushbikes and any increase in traffic unfamiliar with the area and restricted lines of sight is undesirable for safety reasons. Cyclists and motorists alike use this street as a shortcut to Anzac Highway to avoid the traffic lights at the end of Adelphi Terrace.*



Regular scene for weekend traffic flow in Sturt Street immediately outside our house – George Street is located at the stobie pole on the right – cars parked on both sides of the streets and single lane only traffic movement.



This map shows the location of the “traffic jam” pictured above. It also shows how the sharp angle of George Street corners impede line of sight for oncoming traffic and how the development will directly impact the vista of houses 16A to 32 Sturt Street.

**Crime prevention through environmental design:**

The report states that “passive surveillance...will be increased with extended trading hours of operations such as cafes” and “public spaces will be illuminated at night”. As a local resident I read this as more foot traffic into later hours of the night precipitating disturbed sleep due to noise of passersby and the additional nighttime illumination. There is not a safety issue in this area at present and we do not need a 12 storey building erected so that people overlooking our houses from their balconies can provide passive surveillance.

**Noise assessment:**

The one sentence assessment advises “key sources (but not all sources) associated with the development that may provide impacts external to the development are identified as being Building Services and Plant and exhaust and/or ventilation systems and, the car park”. Building Services and plant are not broken down to identify the substantial number of engines, pumps etc. that are to be located on the roof, no mention of the rubbish compacting machine, lift engines/hydraulics or guests, poolside activities etc. “Aurecon further concludes that the short term noise associated with the car park activities is expected to be IDENTICAL to the current situation”. I am not a so-called expert but I fail to see how the current access to the less than twenty parks at the George Street crossover will equate with cars queuing to enter and exit a 200 plus car parking space – highly implausible that it will be “identical” to the current state.

**Economic impacts:**

More pages of sweeping statements of tourism expenditure with tables of figures that don't add up – literally.

**Overlooking:**

Overlooking as defined in planning language it may not be, but the real life impact of this proposal is that we will experience the sense of total loss of privacy whether or not someone or everyone is standing on their balcony looking at our home. This is not about a planning definition, it is about the very real and significant impact of locating a 12 storey building within 80 metres (in some cases 40 metres) of peoples' established homes – places where we live out the lives of normal people – unlike the proposed building which is simply so someone can amass an even greater fortune. We won't ever feel like opening our bedroom shutters again if we are face to face with a view of 70 plus balconies looking back at us.

**Overshadowing:**

*Shadow diagrams have been prepared for 9.00am, 12.00 noon and 3.00pm for four different times of the year, which apparently prove that all surrounding properties receive a minimum of three hours of sunlight between the critical hours of 9:00 – 3:00pm. There is no explanation of why these hours are deemed the critical hours – the majority of us who aren't holiday making are at work during the "critical hours" for at least five days a week so we are more concerned with the sunlight after 5:00pm. There are no shadow diagrams for the times we will actually be at home. We were shocked to discover that in Australia it is deemed that two hours of sunlight is the recommended requirement we can expect to be entitled to. In planning language this might be acceptable but I don't think many Australians would expect to have their sunlight blocked for up to 11 of the possible 13 or so hours in summer? We regularly use our front verandah after work to make use of the afternoon warmth and to view the sunset – potentially we would just be sitting in the shade watching people on their balconies watching us.*

**Viewsheds:**

*The document states that the "While the building is large, it does not materially impact on the enjoyment of views by others. Views from the single and two storey dwellings to the east of the subject site are blocked by the existing two storey Comfort Inn building which currently spans the entire Adelphi Terrace frontage of the subject site. Hence, regardless of the change in height of the proposed building, these views are already blocked. Glimpse views along George and Canning Streets to the Patawalonga Basin will remain essentially as currently exists for residences along those streets."*

*Even if this is true for George and Canning Street residents, which seems highly unlikely given that the proposed building is at least four times the height of the current building, it leaves out the impact of the views of the sky for residents of Sturt Street.*

*From the front rooms of our house (our bedrooms), and from the front garden of our house, the building will block most of our view of the sky and all of our glimpse views to the Buffalo replica, the pine trees and the sunsets. The existing Comfort Inn is barely noticeable in our vista (so does not block our existing view), while the proposed replacement will virtually be the only thing we can see when we step outside our front door and will be obscure the sky completely from within our home (see pictures below). A view is not just of ground level.*

*It also states that "the proposed building sits comfortably within the Glenelg skyline being within the sweep of high rise buildings that already dot the Glenelg landscape" and refers to the nearby Aquarius Apartments which, while of an almost identical height, are roughly one sixth of the length of the proposed building and do not block*



*out the entire view of the sky for any nearby resident.*

*The pictures below show Aquarius Apartments on the left hand side of the picture – noticeable but insignificant compared to the domineering mass of the proposed development.*



*Current view from our verandah – pine trees and the Buffalo replica in the distance- note Comfort Inn is not visible.*



*Artist impression of visual impact of proposed development*

### **Scale Relationship:**

*The document implies that the disparity in height between this building and the nearby one and two storey residential dwellings is “in fact the character of Glenelg”. In fact, it is the diversity of the older one and sometimes two storey residential homes that are the character of Glenelg – example in point the fact that the residences immediately adjacent are zoned Character Residential – noticeably the hotel does not fall within this category.*

*The building scale is not consistent with any other building in this primarily residential location. It is taller than the tallest building and at the same time longer than the longest building creating a mass of unprecedented size (or a mass-ive eyesore).*

### **The Development Report – 9 documents:**

*Overall the document is riddled with unsupported sweeping statements about the benefits to the State and the local community, errors of fact, mathematical errors which exaggerate economic benefit, gaps in information (noise levels of plant and presence of ACM), completely implausible suggestions and language that minimises or ignores the detrimental interface impact for local residents. We cannot speak for the State but feel confident that local residents will share our concerns in regard to the development which we will not benefit from but rather suffer a deterioration of the privacy and enjoyment we currently experience.*

*We hope that the State is not seduced by the lure of extra taxes and places the wellbeing and privacy of the ordinary people at least equal to the business proposition of one wealthy person. We do not have the financial capacity to challenge this proposition or seek independent reports that thoroughly investigate the circumstances rather than theorising from an office desk.*

*There are many issues that require independent investigation prior to any further consideration of the proposal – we implore you to allocate resources to undertake this rather than accepting at face value what is, in some instances, blatantly incorrect. Further information and plausible details are required for the following:*

- 1. Real traffic assessments for George Street that take into account the already stretched parking situation and narrowness of the street including realistic assessments of the increased traffic flow with shops, cafes and convention facilities being added.*
- 2. A definitive assessment of whether ACM is present*
- 3. A definitive and specific breakdown of how noise levels will be kept to acceptable levels given the number and size of all of the plant associated with the building – what specific machinery/equipment is actually available to facilitate this.*

4. *Real assessment for the need for additional accommodation in Glenelg including factual reports on occupancy rates throughout the year not just peak seasons and taking into account the consistently high number of private apartments for sale in the immediate vicinity.*
5. *Operating hours of cafes and pool bars etc – how nighttime noise disruption to local residents will be prevented.*
6. *How airplane noise deflection and glare from reflected sunlight on the western face of the building (which is at least 50% glass) will be prevented – glare being an issue for residents on Sturt, George, Canning and possibly Mary Street (and possibly even pilots)!*
7. *Open statements regarding the % increase in the number of trucks using Canning Street for delivery and collection purposes – this seems like it could result in at least a ten-fold increase over current levels.*
8. *Discussions about compensation to local residents for loss of privacy, loss of amenity, noise from demolition and building works and property devaluation.*
9. *A guarantee that none of these works will be undertaken outside the normal working hours of 8:30 am – 5:00pm Monday to Friday.*

*We're not opposed to the rejuvenation of the Comfort Inn which seems like a very good idea. Even a new development of a similar height would be tolerable in spite of the building phase. It is simply the enormity of this proposed development which will be so incredibly overbearing. The report briefly mentions the impact on Canning Street and George Street dwellings but ignores the visual and overlooking aspect for Sturt Street residents.*

*If the development goes ahead ordinary working people will stand to lose substantial value in their properties – for those of us who have purchased recently it could create financial hardship where mortgages exceed the realisable value of our properties. This leaves us in lose-lose situation – can't get our money back on our house and therefore can't afford to relocate. Surely this is not a state the government would intentionally wish upon its taxpayers.*

*At the end of the day this is a money making exercise for Mr. Maraveggio and his offshore investors that could cost the local residents dearly – our homes are not purchased with profits in mind – they are our safe and private haven that we come home to after a hard day of honest work.*

*Thank you.*

*Yours sincerely,*

*Jenny Cameron and Jeff Vernon.*

To whom it may concern,

I am writing to formally comment on my concerns of the proposed development of the comfort Inn site on Adelphi Tce Glenelg North 5045. I do so without any prejudice to any parties involved.

I am the owner/occupier of 1 Canning St, Glenelg North 5045. The house was built in 1902 and is an excellent example of the historic character of Glenelg. My property shares a common boundary with the Comfort Inn Motel site. I have attached a basic floor plan of the existing dwelling and property which I encourage you to refer to this while considering my concerns.

The first area of concern I would like to raise, is the limited amount of sunlight that will be available to my living areas and garden. As it can be seen in the floor plan of the existing dwelling, there are at least three living areas in my house that will receive below the required allowed time frame of sunlight to the windows. This is for both summer and winter seasons. As the existing dwelling floor plans show, it is extremely reliant on the afternoon sunlight. The three most affected rooms are the formal lounge room, kitchen and dining room.

The loss of sunlight will also have a catastrophic affect for the gardens on the property, especially the 80 plus year old significant frangipani tree located in the rear of the property. The position of the northern corner of the 12 storey structure will guarantee that the existing gardens of the property will not survive.

There are also plans in place to install solar panels to the house. Comments from the subject matter expert in solar technology has suggested that if the development is completed, the solar panels will be inefficient due to the significant shading effect of the optimal afternoon sunlight the structure will have on 1 Canning St, Glenelg North, 5045.

I am also extremely concerned with the wall that is in excess of eight meters running down the boundary of my property. In the plans that I have been privy to, it seems that maintenance to this wall can only be achieved by having access to my property. Where does this leave my privacy rights? If there is a failure of the wall of any type, my dwelling and the occupants inside are at an extreme risk.

The proposed development is for a twelve storey complex. How is the privacy for the entire property of 1 Canning St, Glenelg North 5045 going to be guaranteed?

The area of the development site is in an existing zone of two stories, what plans are in place with regards to the immediate decrease in the property values of the surrounding properties, due to the foreseeable negative affects and changes the twelve storey development will have on the neighboring properties.

During the demolition, construction and operation stages how is pollution of all types going to be controlled? I ask this question with great seriousness as there are numerous recorded and documented issues in the past. These issues include the grounds keeper cutting ivy from our common fence and throwing it over to my property, dirty laundry being left for extended periods of time outside my roller door – partially blocking access, guests of the motel cleaning their vehicles out and throwing the rubbish

over my side of the fence, air conditioner and plant room fans being extremely loud. The loudest recorded fan/air conditioner noise was 82db at my rear door.

With the proposed development plans, it shows that the loading delivery doc will be running along the common fence between the Comfort Inn and 1 Canning St, Glenelg North. Is there going to be time constraints on the operational hours of this loading doc? I ask this as at approximately 0430 every day the bulk waste bins are collected in Queen St. causing a complete disturbance to the immediate neighborhood.

In the immediate area of the Comfort Inn (Canning St, George St, Sturt St and Adelphi Tce), there is very limited street parking. Are the 204 allocated car parks going to guarantee that the on street parking remains available for the residents of the established dwelling residence? How is the excess parking going to be controlled? Does the allocated car parks allow for the restaurant/bar, retail outlets and residence/guests of the complex?

In summary I also ask these questions:

1 – How is the shadowing of sunlight to my property (1 Canning st, Glenelg North, 5045) going to be mitigated?

2 – How is the privacy of 1 Canning st, Glenelg North, 5045, going to be protected?

3 – How are all pollution related issues, including noise, dust etc going to be mitigated during demolition, construction, and operational stages?

4 – There are already limited car parking spaces in the direct vicinity of the Comfort Inn (Canning St, George St, Sturt St and Adelphi Tce), how is the excess parking going to be controlled?

5 – What plans are in place for the immediate decrease in property values?

Paul Paterson



1 Canning St, Glenelg North, 5045.

0424 412 474

Comfort Inn

Comfort Inn

Bowling Club.

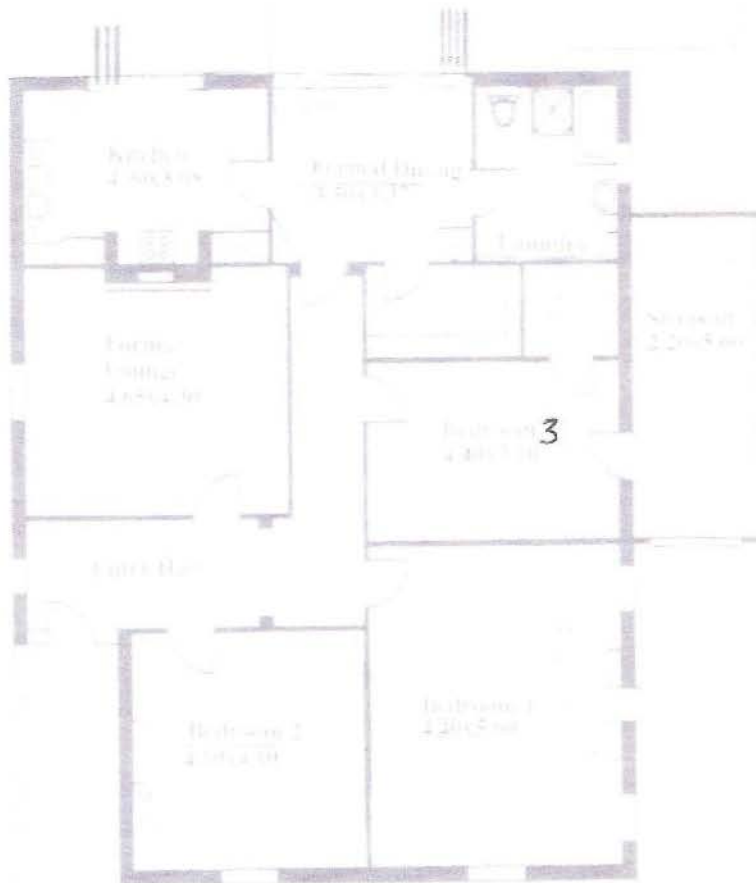


Canning Street,  
Silene North

Carport.

Comfort Inn.

Common Boundary with Comfort Inn-development site.



Canning St.



George St

LOT 15

Comfort Inn  
Haven Marina

LOT 16

Sturt St

Queen St

8 meter high wall.  
Common Boundary

My Property

Canning St

Adelphi Terrace

Laycock Ln

Sturt St

15

11

9

6

7

1

7

2

5

4B

6B

10

4D

5

26

24

22

28

30

Ref: 2015-0332



**URPS**

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28 October 2015

Minister for Planning

**Attention: Mr Robert Kleeman**

Unit Manager, Crown, Major Development and Grants  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

Email: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Minister

### **Representation concerning Major Development – Integrated Hotel Development, Adelphi Terrace, Glenelg**

URPS acts for the Holdfast Ring Bowl Club (the 'Club') located in Queen Street, Glenelg North. The land abuts the above development site, and shares common boundaries with the development site on the Club's west and northern boundaries. The local Club has been in existence for over 80 years and located on this site since 1948.

#### **About the Ring Bowl Club**

Prior to this occupation of the Queen Street site the sport was played on Colley Reserve and the Pier Hotel was the club's base (circa 1925). The Queen Street land became available in 1948 and as the clubs numbers has outgrown local facilities, the land (a former large back yard fowl run) was purchased. The greens were planted straight away and by 1950 the club rooms were built by volunteers over a period of 18 months and the Club was officially incorporated in 1950 (copy attached).

A summary of the key features of the Club are as follows:

- The Club is understood to be the last remaining ring bowl club in Australia and historically it has always been played on a turf surface since its inception.
- There are currently 80 members including 7 living life members. Membership fluctuates, but over the last decade this has remained relatively steady. There were 10 new members this financial year.
- Most events are knock out events played over the course of the day. Generally the number of members bowling on any given Sunday 10-24 (48 plus players is within the capacity of a typical doubles event).
- Events are played year round (season starts on the financial year), primarily Sundays (generally between 10am and 4pm), but can be any day to cater for private and social club functions.
- Mostly daylight events but is also played under lights up until 9.30pm.
- I am instructed the existing use rights are not encumbered by any 'conditions' of use.



Retaining and attracting new active playing members is the Club's priority. Any impact on the ability to provide the current standard of playing surface will negatively impact on the ability to attract new members, and is expected to negatively impact on the ability to retain members.

The Club is a not for profit club. All work is voluntary and any surplus is spent within the club. Comparing all the Club's costs, insurance and Council rates represent the greatest proportion of Club expenses, but the single most intensive activity is the management of the greens. The cost of this is significantly less than other abovementioned club costs as it relies exclusively on other's expertise and volunteer labour.

The Ring Bowl equipment is not commercially available in Australia. The ring bowls have been made and or handed down by members over the years, hand made locally or were also sourced from other ring bowl clubs that have closed. The rings are wood and weighted with brass or lead ingots on one side cause a bias when rolled.

### Importance of the Surface

Importantly the playing surface is a turf surface and the Club is not aware of the surface being anything else in other parts of the world.

The Club must retain its ability to promote social events to raise income for the club. It is these events which play a critical role in the viability of a residential club of this kind. The principal Club attraction is the uniqueness of Ring Bowl itself. If it was to be played on anything other than its traditional surface, a feature that is of historical importance to the Club, if that became its only option due to the impacts of adjacent development (eg options such as artificial turf) its future is uncertain.

The principal concern of the Club arising from the Major Development proposal is that membership may drop if there is any impact on the playing surface to the extent it cannot be managed to suit the Club's playing needs. Furthermore, any other surface is unlikely to support the club's needs in terms of attracting outsiders for special events and social events and new members to this experience.

The playing surface currently enjoys sun exposure over the majority of the playing hours. While playing the shade is not the principal concern, the surface needs sufficient daylight exposure – consistent with its current levels - in order to appropriately recover and to maintain a year round playing surface.

### Development Impacts

The Club's greens manager, Andrew Patching, is a green keeper by trade with over 25 years experience.

Maintenance of the green is exclusively by volunteers which minimises the overall expenditure on limited club resources of providing a natural playing surface that can be used year round. There is a two week break only (approximately) after coring and top dressing but that generally only occurs once a year. Couch does not generally grow in shade, but with enough sun it can be managed to provide a year round surface.

There are seven rinks mostly running north south but one runs east west. Each rink is a maximum of 15 metres long, with different lanes approximately 4.0m wide. There is no available land capacity to change the location or numbers of individual rinks within the green.

An automatic watering system with pop up sprinklers is installed, design based on the arrangement of the rinks and their orientation. The turf is kept slightly longer than traditional for a conventional lawn bowling green and hence is cut a bit longer.

Mr Patching reviewed the application detail and raised specific concerns as to the loss of direct sunlight to the playing surface through overshadowing of the greens as a direct consequence of the proposed height of the proposed building and the building elevation extending across almost the entire length of the development site.

### Independent Turf Assessment

The Club's greens manager instructed *Turfwise Consulting* to inspect the greens and prepare an assessment of the impact of the proposed Major Development Proposal based on the information provided in the application detail. *Turfwise Consulting* is Adelaide based and has extensive experience in golf course preparation for tournament, membership, corporate and public use, as well as providing consultancy services to the AFL, SANFL, SACA, Thoroughbred Racing SA, local government and other sectors of the turf industry. The firm provides all sectors of the turf industry with independent advice on the sustainable management of turf systems, so they may continue to provide social, environmental and economic benefit to the community.

The report concludes (summary):

- The existing and well established couch is well suited to the Club's use and Adelaide's climate.
- Couch has low shade tolerance, but the sections of turf that are currently in shade at certain times of the year are generally off the main playing surface and do not significantly impact on the quality of the green overall.
- Shade modelling indicates there will be no sunlight access on the green surface from 3pm through the year, and potentially as early as 1pm during winter.
- If the forecast shading was to take place between 1pm and 3pm every afternoon, a reduction of between 35-40% on direct sunlight exposure can be expected.
- This will not only reduce the turf photosynthetic activity during the warmest part of the day, but effectively reduce the maximum air and soil temperatures.
- The proposed development will have a significant detrimental impact on the growth, health and functionality of the turf green at the Club's site throughout the year.

Suggested alternatives to the current green surface are considered in the report, but each is either not conducive to the game of ring bowls, is expensive in terms of capital costs, operating costs and replacement costs (eg artificial lighting or synthetic turf) and difficult to manage. In the case of two of the only alternative turf options considered suitable, each is equally affected by the limited sunlight access and a compromise due to it being less conducive to ring bowls due to lower wear tolerance and or the mowing height required to account for the significant shading of the site.

The Turfwise Consulting assessment has confirmed the views of the Club's greens manager. There are direct and serious consequences arising from the proposed scale and consequential overshadowing impacts of the proposed Major Development.

### Overcoming the Objection

The Club has considered a number of outcomes that may overcome the seriousness of the concerns in relation to the development impacts, but these are not necessarily without impact on the Club and its ongoing viability.

In the event the Club could not operate any longer, the only conceivable land use alternative is residential development. The same overshadowing conditions arising from this Major Development proposal will be a significant constraint to providing a reasonable standard of amenity to future residential development on the site of the Ring Bowl Club or making the site attractive to a potential purchaser.

### *Synthetic Turf*

The green's manager has made general enquiries as to the cost of the untested alternative, synthetic turf. I am instructed that synthetic turf over the area of the existing greens could be well in excess of \$100,000.00. The Club's greens manager advised the Holdfast Bay Council has a policy that there will be no synthetic turf in Council road verges and Council land because of concerns with the impacts on microclimate and soil conditions around the base of other vegetation and trees. Mr Patching is aware of drainage and heat issues associated with synthetic turf and these matters could be problematic for a playing surface, apart from the potential for mould and soil temperature issues in the event of extensive overshadowing of the seven rinks if the Major Development proposal is constructed as per the application drawings.

While the anticipated life span of synthetic turf is estimated between 15-20 years, this is subject to the intensity and type of use. Examples of traditional lawn bowl greens being converted to synthetic turf are few, but I am instructed that the Novar Gardens Bowling Club and anecdotally expects an approximate 8 year life span.

In addition to the abovementioned complications, the Club is unlikely to be in a position to ever meet the cost of replacing the natural greens with a suitable synthetic playing surface, quite apart from any periodic ongoing replacement costs, without compensation which is ongoing for the life of the club.

### *Relocation of Ring Bowl Club in the Glenelg locality*

An alternative site would realistically need to be in a similar Residential Character Zone (ie the current zoning) where there is an expectation that only low scale and low rise residential buildings are envisaged. To provide any long term benefit, the location would need to be further distant from major transport corridors or other zones where, over time, there may be expectations of higher density and significantly higher rise than currently envisaged on the Club land or the development site under the current zoning (each currently being an area envisaging buildings up to 3 storeys).

The Club anticipates the forced relocation of the facility to another local location in the wider Glenelg area is beyond its current financial means, even if suitable land could be identified and was in an appropriate zone that supports such recreational facilities. Often its *new* sporting facilities that draw objections from neighbours in predominantly residential localities.

### *Design Changes*

The Development Guidelines prepared for the applicant by the Development Assessment Commission (DAC) July 2015 requires that the Development Report provided by the applicant must include various details. Some of the key issues for the Club are summarised under a series of headings below. These are

raised for the purpose of identifying possible design changes that might be considered appropriate for this site.

### **Consistency with Policy and Legislation (3.2)**

The expressions of Desired Character for the development site's Residential High Density Zone – Urban Glenelg Policy Area 15, envisages *“a higher degree of overshadowing and loss of privacy is expected in the policy area given the medium-to-high density nature of development (and heights).”* The proposed development site which abuts the Club's land, at 3-4 storey car park construction on the boundary and an additional 10 hotel/apartment levels (plus plant) above that represents a substantially higher degree of overshadowing than current conditions, and an impact that that is not envisaged for existing uses in other zones outside of the Urban Glenelg Policy Area 15. The development site is intended for high density development, but not high rise. There is no objection or impediment to achieving higher density on this site, but the impacts of overshadowing of high rise development cannot be managed on such a narrow site.

Furthermore, the Club is particularly concerned that this application has been lodged before the State Government has released draft Development Plan Amendment policy changes that is being considered for allotments fronting Adelphi Terrace (among others). The local community has not had an opportunity to review and comment on draft policy (a requirement under the Development Act and Regulations) but is being asked to consider a built form outcome that is significantly different from current Development Plan policy. This application is premature at best as there is no certainty that the pending Development Plan Amendment will ultimately introduce a 'high rise' policy for the development site, or if it does, to what extent the high rise could be capped at or limited to for any number of sites/localities:

- having regard to the constraints presented by narrowness of allotment depths fronting Adelphi Terrace
- in response to public submissions in response to the Public Exhibition DPA, noting there are numerous residential premises that are equally affected by the significant overshadowing impacts arising from this Major Development.

### **Critical Assessment – Economic Impact**

Section 6.1 of the Development Report only refers to the economic benefits of the proposed development. The impact of the development is such that the Club may become economically unviable for the reasons already expressed above.

### **Critical Assessment – Strategic Precinct Evaluation**

6.2.1 of the Development Report notes that the “quantitative metrics” of the Development Plan policy for the zone makes for inadequate provision of high end large scale tourist accommodation to satisfy the international market. It is our observation that the majority of land that enjoys possible vantage points to water views and is close to the waterfront strips and commercial centres referred to, is zoned to support tourist accommodation. It is not appropriate to conclude that all high end tourist accommodation for international visitors needs to be in the form of high rise buildings. There is a large part of the Glenelg waterfront that is indeed dedicated to this high rise type of built form, and in our view the current policies reflect the desire for different densities and heights for different locational circumstances.

### **Critical Assessment – Neighbourhood Interface**

6.2.3 Urban Form Relationships compares the separation distance between the Aquarius Apartments south of the development site with its eastern neighbours (being about 8m off the eastern boundary) with the setback of the facade of the tower portion of the proposed development and its eastern neighbours including the Ring Bowl Club (varying from 9.5m to 14.5m). The commentary is provided in the context of visual perceptions of scale, noting the report does not contend the setback reduces the scale of the proposed building, rather it reduces the sense of “*overbearing of a tower that was built close to the site boundary*”.

Nevertheless, the effects of the limited setback and scale of the building on the Ring Bowl Club, are not sufficiently mitigated in the design to manage the substantial change in increased over shadowing of its playing surface. Even under the current Development Plan, it would be reasonable for the Club not to support a 3 storey building constructed right on the boundary.

### **Medium Assessment – Design Quality**

The proposed development will introduce the largest scale building on Adelphi Terrace in this section of the residentially zoned land. Although it is of similar height to the Aquarius Apartments, it is of substantially greater building mass extending almost the entire the length of the site for over 100 metres. It has a significantly different impact than the Aquarius Apartments in terms of overshadowing. The comparatively significantly smaller foot print of the existing tower opposite has a much smaller overshadowing impact at different times of the day as the sun moves around, lessening the duration and extent of overshadowing impacts through its design and building setback relationships.

### **Standard Assessment – Shadow Diagrams**

The above comments are illustrated in the Shadow Study Diagrams submitted with the application.

Under existing conditions, almost all of the shadow study scenarios, consistent with the Club’s observations, provide a relatively high proportion of sunlight to the playing surface.

Under proposed conditions the impact of the development, all scenarios result in consistent afternoon shading throughout the calendar year.

At the potentially worst affected period (the winter solstice 21 June) the extent of overshadowing impact is dramatically different from current conditions, and will potentially restrict sunlight on the green surface from as early as 1pm during winter.

Having regard to the specialist assessment of *Turfwise Consulting*, the shade modelling demonstrates the development will have a significant impact on the growth health and functionality of the turf green at Club’s facilities throughout the year. The shade modelling is within the parameters of what is ordinarily required to assess the impact of development on solar access to residential properties and outdoor private open space. The Club’s concerns are less about the loss of amenity of the open space due to the loss of direct sun (as might be the case for residential owners and occupiers), but the quality of the playing surface that directly compromises the surface and ultimately the club’s activities. The expenses associated with possible synthetic turf or relocating, is anticipated to be of significantly and unreasonably high cost to the Club. Other turf species potentially suited to this type of activity are equally detrimentally affected by the increased in shading and are not considered viable long term options.

The effect of the development on overshadowing of the Club's land is considered unreasonable and is not supported.

### Summary of representation

The Holdfast Ring Bowl Club has no objection to the range of land use activities proposed in this Major Development. The Club considers its own activities are those that support tourism and community recreation in its own right, thus serving local and district social needs in the wider locality. Other tourism developments in the locality potentially have a positive impact on visitors to the Club's own facilities, but that is only made possible by maintaining conditions conducive to its long term operational success.

The Holdfast Ring Bowl Club objects to the design and scale of the proposed Major Development as set out in the application drawings. The development site is not sufficiently deep enough to provide a building of this height and overall form and scale, without having a serious impact on the club's playing surface and ultimately the viability of the Club. A different design involving one or two individual and smaller towers of the proportions more like the character of high rise development in this immediately locality is one way that may overcome the objection. An alternative design of this form would provide opportunities to maximise solar access over a longer afternoon period throughout the year. Although such an alternative design outcome will still have an adverse effect on the playing surface, it is anticipated that it may not be so serious as to block out the larger proportion of afternoon sun that is necessary to retain and manage the turf surface.

If alternative design solutions to significantly reduce the year round solar impact are not achieved in an amended proposal, for commercial or economic reasons, then it is considered the proposal constitutes over development of the site. The Club can support a lower rise, lower density solution for a mixed use tourist development that is consistent with the local community expectations, consistent with the current objectives for the land expressed in the Development Plan.

It is of great concern to the Club that this development will negatively impact on the Club facilities to the extent it cannot maintain a natural playing surface, which is one of the key components necessary to attract members and visitors. It is respectfully submitted that the Major Development proposal is not supported in its current form. Recreation facilities such as the holdfast Ring Bowl Club are a desired and envisaged part of the neighbourhood and are specifically envisaged in the Residential Character Zone. The proposed development of this height and scale is not compatible with the established character and use of adjoining land in the context this locality. Although a land use in the form of tourist development is envisaged on the development site in the Residential High Density Zone Precinct 3 Three Storey "where site conditions permit" the development overall is not responsive to those site conditions of the land and locality.

Club members and/or its representatives would be pleased to meet and discuss any aspect of this submission should you need clarification of the above or if any opportunity is extended to representors to appear before those preparing a recommendation in relation to this development.

Yours sincerely



Julie Lewis  
**Senior Associate**

Enc Turfwise Consulting (Daryl Sellar)  
Photos and article

## HOLDFAST RING BOWLS CLUB

OCTOBER, 2015

Turfwise Consulting was engaged by Holdfast Ring Bowls Club (HRBC) to provide comment on the potential impact of shading on the club's green from a proposed development to the west of the club.

### Background

The green surface comprises predominantly couch grass, a well suited turf species for the intended use and Adelaide's climate due to its prostrate growth, tolerance of low mowing and heat, and relatively low water requirements.

Couch has low shade tolerance, and this is exacerbated when subjected to low mowing and concentrated traffic, both of which occur when utilised for ring bowls.

In the current situation, there are sections of the turf surface that are compromised by existing shade levels at certain times of the year, however these are generally off the main playing surface and do not significantly impact on the quality of the green overall.



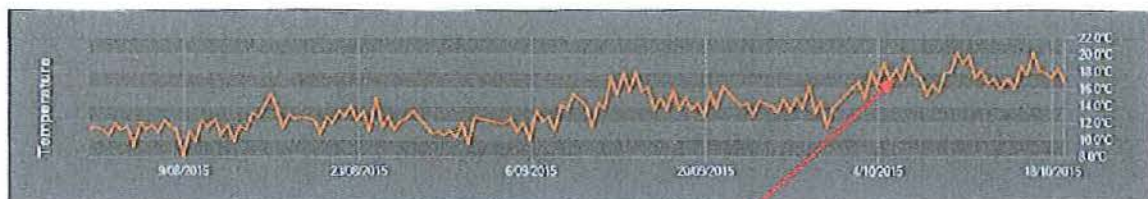
Green location with development site to the west



**Comment**

The proposed development will see a significant increase in afternoon shading throughout the year. Shade modelling suggests there will be no sunlight on the green surface from 3pm throughout the year, and perhaps as early as 1pm during winter.

Below is a graph of soil temperatures from a couch grass site in full sun at Glenelg Golf Club. It shows the diurnal fluctuations in soil temperatures and gradual rise with increased day length when in full sun. This increase in soil temperature would be expected to be delayed at HRBC if the forecast shading was to take place between 1pm and 3pm every afternoon, a reduction of between 35-40% on direct sunlight exposure throughout the year.



Couch begins to break dormancy

Bunnell and McCarty studied the impact of various shading patterns on Tifdwarf Bermuda (couch) grass, and their results are summarised in the table below;

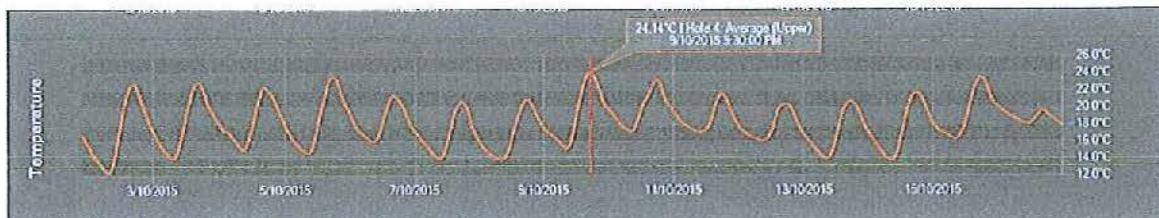
| <b>SUNLIGHT VS. TURF RESPONSE</b> |                   |                              |                    |                    |
|-----------------------------------|-------------------|------------------------------|--------------------|--------------------|
| Treatment                         |                   |                              | TifEagle response* |                    |
| % morning shade                   | % afternoon shade | DLI (moles/square meter/day) | Turf quality       | % lateral regrowth |
| 0                                 | 0                 | 41.6 ± 0.85                  | 8.46 a             | 69 a               |
| 0                                 | 41                | 36.3 ± 0.74                  | 7.73 c             | 69 a               |
| 0                                 | 92                | 29.6 ± 0.63                  | 5.79 f             | 61 ab              |
| 41                                | 0                 | 37.6 ± 0.77                  | 8.02 b             | 65 a               |
| 41                                | 41                | 32.9 ± 0.67                  | 7.23 d             | 69 a               |
| 41                                | 92                | 26.2 ± 0.55                  | 5.02 g             | 55 b               |
| 92                                | 0                 | 34.1 ± 0.70                  | 7.39 d             | 67 a               |
| 92                                | 41                | 28.8 ± 0.59                  | 6.12 e             | 63 ab              |
| 92                                | 92                | 22.1 ± 0.46                  | 3.85 h             | 31 c               |

\*Turf quality and lateral regrowth ratings were measured weekly for eight weeks. Turf quality is rated on a 1-9 scale, where 9 = best turf, turf quality below 7 is commercially unacceptable. Means in the same column followed by the same letter are not significantly different from each other.

**Table 3.** Turf quality and percent lateral regrowth of TifEagle bermudagrass receiving various levels of sunlight (daily light integrals) in Clemson, S.C., from June to August in 2001 and 2002. Daily light integral means are followed by ± standard error of solar irradiance over the eight week study for both years.

*Sunlight requirements for Ultradwarf bermudagrass greens - Without a full day of sunshine, TifEagle bermudagrass greens do not thrive.; B. Todd Bunnell, Ph.D., and Bert McCarty, Ph.D.; Golf Course Course Management, 2004*

The graph below highlights the "lag time" between maximum air temperature and maximum soil temperature. The denial of direct sunlight to the green surface after 3pm throughout the year is expected to significantly reduce the cumulative effect of heat absorption in the soil, and hence retain soil temperatures considerably lower than current levels, and lower than ideal for couch growth for the majority of the year.



Soil temperatures consistently above 18°C are required to initiate root and rhizome growth within couch grass, with 26°C found to be optimal (Bermudagrass *"The Sports Turf of the South"* - Richard L. Duble, Turfgrass Specialist, Texas Cooperative Extension, Texas A&M).

The loss of such significant direct sunlight is expected to have the following impacts;

- Reduced photosynthetic activity for the turf to produce growth and recovery from wear
- Reduced soil temperature increasing length of dormancy
- Reduced growth potential at the time of day when most use is undertaken (i.e. afternoons)
- Reduction in turf density, and increased weed and disease pressure
- Extended periods of green closure to allow recovery

## Options

- Raise mowing height considerably to increase photosynthetic activity of each plant by increasing leaf surface area
  - Not conducive to the game of ring bowls
- Invest in artificial lighting
  - Expensive and time consuming to manage
- Convert turf species
  - A fine textured turf species is required for ring bowls, and the only options worth considering are
    - Creeping bentgrass
      - The limited sunlight is unlikely to support bent grass due to its existing lower wear tolerance
    - Fine leaf fescue
      - Would alter the playing characteristics of the playing surface due to its more vertical growth habit and may not be conducive to ring bowls, especially at the mowing height required due to shade
- Synthetic turf
  - Capital and maintenance costs, especially with moss and algae management throughout winter, and replacement at the end of its lifespan.

Based on the shade modelling provided, it is felt the proposed development will have a significant impact on the growth, health and functionality of the turf green at HRBC throughout the year.

Of particular concern is the consistent afternoon shading throughout the year, which will not only reduce the turf photosynthetic activity during the warmest part of the day, but effectively reduce the maximum air and soil temperatures realised at the green surface throughout the year.

Should you have any questions regarding these comments, please do not hesitate to contact me.

Daryl Sellar M.Agr (Turf Mgt)



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# CLUB WITH NO PEER

**T**HE WORLD GOVERNING BODY FOR THE SPORT OF ring bowls meets on the second Sunday morning of each month down a side street in Glenelg North. After that, and every Sunday of the year, the Holdfast Ring Bowl Club members take to their green to play in among the motels, houses and holiday flats down by the Pat.

The world champion, Reg Smith, will be there, caressing his biased wooden rings in a wide arc towards a kitty at the other end. Like all games of bowls, the closer you are the better you score, although rolling a ring takes more learning than bowling a ball.

The Australian champion at only 21, David Albanese will also be there. In fact, all the recent world and Australian champions will be there most Sunday mornings, because Holdfast – barring the miraculous discovery of the sport in Patagonia or the Arctic Circle – is the only ring bowls club left on the planet.

Which makes the club committee the keeper of the flame and club secretary Geoff Patching the Andrew Demetriou of ring bowls. Yet almost nobody outside the club knows anything about the survival and success of SA's living piece of sporting history, the Holdfast Ring Bowl Club.

That's even though it has been around for at least 80 years. South Australia's best kept sporting secret is so secret that no less than Glenelg Mayor Ken Rolland wasn't aware of it until the club's annual trophy night started appearing in his appointments diary seven years ago.

The mayor presents a trophy and with his wife Anne revels in the hospitality. "They're a jovial lot," says Ken. "I enjoy going along. A unique little club like theirs is fabulous. They provide an alternative, and that's what life is all about."

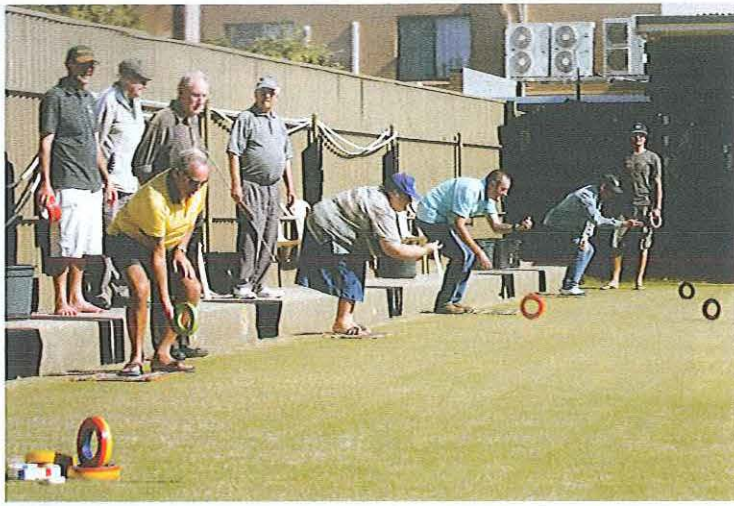
Stories about the origins of ring bowls are many and well travelled. One credits an Englishman who took spokes out of a bicycle wheel. Another says it was Welsh coal miners. Yet another makes it local, in Adelaide, when in the 1920s a bloke called Jack Moore kicked a paint tin lid and watched it roll with a bias.

The back yard of the Edinburgh Castle Hotel in Adelaide gets a mention, along with the Parklands near West Tce cemetery. Ring bowls flourished in the Depression as a cheap, transportable, sociable pastime.

Whatever its true origins, the Glenelg sporting community cottoned on to it early, and was rolling ring bowls on the Colley Reserve lawns as early as 1927. Just after World War II and into the 1980s, before television took hold and licensing laws were relaxed, there were clubs all over Adelaide – in the city, Rosewater, Payneham and Seaton.

With Holdfast, they made up a thriving ring bowls culture on Friday nights and all day Sundays. Everyone aware of the history of ring bowls concedes that one of the sport's original charms was that it could curve its way around the State's restrictive licensing laws.

Ray "Doc" Jaekel, a Holdfast member for 46 years, says that in the six o'clock closing era there wasn't enough room in the



clubrooms for everyone to get in. Ring bowls competition was fierce and clubs might have more than 100 members.

Then came colour TV, computer games and pubs open on Sundays. The Seaton club was the last to fall over, which left Holdfast with a lifetime supply of ring bowls but no one in SA to roll them against. Then when a Queensland club folded a few years ago, Holdfast was all on its own.

Despite its solitariness, the club has made a virtue of necessity with its World and Australian Cups assuring its dominance of the sport. Holdfast has 80 members and more local sponsor trophy donors than there are weeks in the year.

"The club probably is in its healthiest financial state since the 1970s," Geoff Patching says proudly, Demetriou style. What he admits began as a "gentlemen's drinking club" has arrived in the 21st century. Holdfast Ring Bowl Club now has three female members, with many more wanted.

The sport itself is intriguing, easier said than done. "It's an interesting concept, working out how fast you have to bowl, what angle," says Ken Rolland. "They never go where I want them to go. You need to be experienced."

Roll it, don't throw it, seems to be the first principle. Then it's a matter of skill and judgment, like most sports. Doc Jaekel also plays lawn bowls, but prefers ring bowls because a good shot is credited, and cannot be driven out.

If you put your bowl over the kitty you score a "ringer", five points. If you put another one on top, it's a "crown", 10 points.

The sport of ring bowls holds just as much appeal for current world champion Reg Smith (above) as it does for 21-year-old Australian champion David Albanese. The Holdfast club is just as inclusive of women today at its Queen St address (top left) as it was at Glenelg in 1927 (bottom left). Secretary Geoff Patching, president Jules Patching and Ray "Doc" Jaekel (opposite page) can be found rolling a ring most Sunday mornings.

There has only been one crown at Holdfast since the 1940s. So a golf hole in one has nothing on a ring bowls crown.

Holdfast moved to its Queen St, Glenelg North, address in 1948. In true sporting tradition, members planted their own green and built their own clubrooms in the old chookyard. Now that old chookyard is valuable real estate.

Should the club ever fold, five charities will benefit from the sale of the property. It's the right thing to do, says Geoff, in return for all the good times. Not that closing down is on the agenda; Holdfast Ring Bowl Club is a world championship venue, after all.

So what are the qualities of a ring bowls world champion? "You have to think," says the champ, Reg Smith. "You have to be tactical. You have to have a lot of luck, and you have a lot of fun."

Club Photos – Sunday 25 October 2015 9.30am



Club Photos – Sunday 25 October 2015 12.30pm (top) and 3pm (bottom)





Club Photos – General Play



URPS images 22 October 2015 5.30pm and 5.43pm



28 October 2015

Robert Kleeman  
Unit Manager, Crown, Major Development & Grants  
Investment Management, Development Division  
Department of Planning, Transport & Infrastructure  
majordevadmin@sa.gov.au

Dear Robert,

**Adelphi Terrace, Glenelg – Integrated Hotel Development  
Major Development – Response to Development Report**

AECOM Australia Pty. Ltd. (AECOM) has been engaged by Lynch Meyer Lawyers, acting on behalf of Scott Salisbury, to undertake a review of the recently released Development Report in relation to the above project.

Our client, Scott Salisbury, is the owner of 15 Cygnet Court, Glenelg North, a property located on the western side of the Patawalonga River, with direct unimpeded views of the subject land.

This letter forms an objection in response to the Development Report prepared by Holmes and Partners in support of the proposed Major Development.

## Background

Under Section 46 of the *Development Act 1993*, the Minister for Planning can declare a proposed development a 'Major Development' if he believes that "... *such a declaration is appropriate or necessary for proper assessment of the proposed development, and where the proposal is considered to be of major economic, social or environmental importance*".

On 7 May 2015, the Minister for Planning made a declaration in *The South Australian Government Gazette* that an Integrated Hotel Development at Adelphi Terrace, Glenelg, will be assessed as a Major Development pursuant to Section 46 of the *Development Act 1993*.

The proposal is for an integrated hotel development comprising tourist accommodation, as well as private apartments, with a function centre, recreation areas, café and bar, and associated car parking and infrastructure at the subject site of 6-10 Adelphi Terrace, Glenelg.

Specifically, the proposal is described in the declaration as:

*"... an integrated hotel development comprising a range of one and two bedroom hotel suites, as well as townhouses, apartments and penthouses to be available to the open market, together with a function centre, outdoor recreation deck, cafe and bar, and associated car parking and infrastructure."*

Such a declaration has triggered a State-run five stage assessment process as follows:

|                |  |
|----------------|--|
| <b>Stage 1</b> | Referral of the development application to the Development Assessment Commission (DAC) for setting of detailed assessment level and issuing of Assessment Guidelines |
| <b>Stage 2</b> | The proponent prepares an assessment document and issues it for a mandatory period of public and agency comment  |
| <b>Stage 3</b> | The proponent responds to the public and agency comment  |
| <b>Stage 4</b> | The Minister assesses the proposal and issues an Assessment Report   |
| <b>Stage 5</b> | Decision by the Governor   |

Stage 1 of the above process has been completed, with DAC determining that the proponent must prepare a Development Report in respect to the proposal. Assessment Guidelines were then issued, and the proponent has prepared their response, as contained in the Development Report which is the subject of the current consultation process (Stage 2 of the above process).

## Summary of Proposed Development

The subject land is a large irregular shaped allotment with frontages to Adelphi Terrace to the west, George Street to north, Canning Street to the south, and an interface to the east with a bowling club, holiday units and a number of single and two storey dwellings within the suburb of Glenelg.

As described in the Development Report, the proposed development is for a 12 storey hotel and conference facility, and associated retail, residential apartments and car parking. In essence, this is a 'major tourist hotel development'.

The proposed hotel development consists of 146 apartment accommodation units and a large conference/meeting facility (totalling 737 sq metres of floor space), significant café/bar facilities (200 sq metres) and retail tenancies (767 sq metres), and major guest recreation and leisure facilities. In addition, the development consists of 60 private residential apartments and 204 car parks.

This is a significant development, with a three-level podium proposed to the Adelphi Terrace frontage – measuring almost 120 metres in length, with a nine-level tower above, giving a total height of approximately 47.4 metres (to the top of the plant room).

Aside from the 12-storey Aquarius Apartments on Adelphi Terrace (south of the subject land), all other development on the eastern side of Adelphi Terrace is no more than three storeys in height. The Aquarius Apartments, although of a similar height to the proposed development, is a relatively slender tower (measuring approximately 15 metres in width) set on a relatively larger, open (and landscaped) site.

## Assessment of the Proposal against the Relevant Development Plan

Under section 46D of the *Development Act 1993*, the applicant is required to include a statement in the Development Report on the extent to which the expected effects of the development are consistent with the provisions of relevant Development Plan (amongst other matters to consider).

The Development Plan applicable to the assessment of this Major Development Application is the **Holdfast Bay Council Development Plan**, consolidated on 18 December 2014 (Development Plan applicable on the date of the Major Development declaration – 7 May 2015).

### Residential High Density Zone

The subject land is located within the Residential High Density Zone. The primary Objective of this zone seeks to accommodate:

*“... a range of high density dwellings, including a minimum of 15 per cent affordable housing, primarily in the form of row dwellings and residential flat buildings, designed to integrate with areas of open space, neighbouring centres or public transport nodes.”*

Furthermore, Principle of Development Control 1 of the Residential High Density Zone envisages a variety of dwelling types, including affordable housing, residential flat buildings, row dwellings and supported accommodation. The Principle also envisages small scale non-residential uses that serves the local community.

### Urban Glenelg Policy Area 15

The Zone is divided into a number of Policy Areas, with the subject land being contained within Urban Glenelg Policy Area 15. The primary Objective of the Policy Area seeks:

*“A policy area comprising tourist accommodation and a range of dwellings and residential flat buildings at low to high densities.”*

The Desired Character states that the Policy Area *“... provides the Council's premium coastal medium-to-high density living opportunities ... The Policy Area adds to the choice of accommodation within Holdfast Bay and the wider metropolitan area by providing for a variety of medium and higher density dwelling types, including apartments for residential purposes and visitor accommodation.”*

### Precinct 3 – Three Storey

The Policy Area is then further divided into three Precincts, each encouraging different building heights and form of development. The subject land is located within Precinct 3 – Three Storey. Aside from the Desired Character for the Precinct, which encourages a mix of residential development (including detached, semi-

detached and row dwellings, and residential flat buildings). The Precinct also encourages tourist accommodation “... where site conditions permit.”

There are three ‘Precinct Specific Provisions’ for Precinct 3 – Three Storey, with Principle of Development Control 19 relating to height of development, stating:

*“Development should not exceed an external wall height of 10.5 metres above natural ground level (excluding lift service levels and gables).”*

### **Planning Commentary**

The Residential High Density Zone is a relatively narrow zone, including properties fronting the eastern side of Adelphi Terrace from Anzac Highway to Macfarlane Street (generally one to two properties in depth). To the east, the zoning is primarily Residential Character, whilst to the west, the zoning is generally the Glenelg Foreshore and Patawalonga Zone.

Whilst the zone envisages “... a range of high density dwellings ...”, the policies are silent in relation to tourist accommodation facilities and only seeks “... small scale non-residential use that serves the local community”.

The proposed development, being a ‘Major Tourist Hotel Redevelopment’ (as described on the cover of the Development Report) is of a commercial nature which is much more significant than envisaged in the Residential High Density Zone. The proposed development is well in excess of the residential development and small scale non-residential uses envisaged for the Residential High Density Zone.

The Urban Glenelg Policy Area 15 envisages tourist accommodation and a range of dwellings and residential flat buildings at low to high densities, however Precinct 3 – Three Storey within the Policy Area, is specific as to the height and scale of development which is envisaged, that being development up to three storeys in height and a maximum building height of 10.5 metres above natural ground level.

The proposed development is approximately three times higher than the maximum height sought for this Precinct (approximately 47.4 metres to the top of the plant room), resulting in a significant visual intrusion on the existing locality, and adverse impacts on adjacent residential properties (primarily being single and two storey development).

The three storey limit to development within this section of the Residential High Density Zone was imposed to minimise impacts on adjacent land to the east, which is currently zoned Residential Character, and to encourage higher density development within this locality through a mix of dwelling types including three storey townhouses.

Even in consideration of the proposed three storey podium element of the building, the proposed twelve storey development, of almost 120 metres in length, will be visually dominant, will have a significant adverse impacts upon the adjacent properties within the adjacent Residential Character Zone, and is totally uncharacteristic of this locality.

Further, the scale of development proposed, consisting of 146 apartment units, 60 private residential apartments, with large conference/meeting facilities, significant café/bar facilities and retail tenancies, is of a scale that will significantly impact on the surrounding local street network and adjacent residents.

Development of the height and scale envisaged would be more suitable and appropriate in the Glenelg Foreshore & Patawalonga Zone, which has been established as “A major tourist and recreational focus for Glenelg and the State” and actively encourages a range of tourist accommodation facilities including tourist accommodation, such as hotels and apartments. Even within this Zone, Principle of Development Control 6 states that buildings north of the Patawalonga Basin should not exceed three storeys in height above existing natural ground level.

As stated in the Development Report (Section 8.1 page 69), “... the current zoning and policy areas, although foreshadowing tourist accommodation, actually provide extremely limited scope for the development of a large scale tourist accommodation facility at Glenelg... No opportunity exists for development above 3 storeys along Adelphi Terrace.”

Additionally, the proposed development will further draw businesses and activities away from the Glenelg Foreshore area which has been designated as the central focal point for Glenelg and the surrounding areas. This will have implications on traffic in the locality, and may dilute the retail focus of Jetty Road and the surrounding precinct.

**Impacts to the Amenity of the Locality**

In addition to the Planning considerations of the proposed development against the Development Plan provisions, the proposed twelve storey building will have significant impacts to the amenity of the locality. Specifically, the development will result in a significant increase in traffic to the surrounding residential areas, which are predominately comprised of local-level streets, will impede the existing vistas to the Patawalonga Basin for the existing surrounding community, and overshadowing and overlooking into the surrounding properties.

**Conclusion**

In summary, the proposed twelve storey development is significantly at variance with the relevant provisions of the Holdfast Bay Development Plan, will not complement the existing character of the locality, and will result in significant adverse impacts to the amenity of the surrounding community.

Accordingly, we do not support the proposed development in its current form. We would be pleased to be heard in support of this letter.

Yours faithfully

**Brenton Burman**

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Ref: 2015-0257

28 October 2015

Minister for Planning

**Attention: Mr Robert Kleeman**

Unit Manager, Crown, Major Development and Grants

Department of Planning, Transport and Infrastructure

GPO Box 1815

ADELAIDE SA 5000



**URPS**

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Dear Minister

### **Representation concerning Major Development – Integrated Hotel Development, Adelphi Terrace, Glenelg**

URPS acts for the owners and occupiers of the Aquarius Apartments, Strata Corporation 5463 Inc located at 4 Adelphi Terrace, Glenelg North. The land is opposite the above development site, on the south-east corner of the intersection of Canning Street and Adelphi Terrace.

The application is described in the Public Notice as “*an integrated hotel development comprising a range of one and two bedroom hotel suites, apartments and penthouses to be available to the open market, together with a function centre, outdoor recreation deck, cafe and bar, and associated car parking and infrastructure*”.

In the “*Guidelines for a Development Report*” (the ‘Guidelines’) the development is further described as including:

- *Retail premises and commercial premises* (listed separately from the function centre, residential accommodation and tourist accommodation)
- *A change in the use of land*
- *The division of an allotment (although to what extent this forms part of the application is not specified)*

Under Section 46D of the Development Act, the applicant is required to state the proposal’s consistency with the relevant Development Plan and Planning Strategy in addition to responding to the Guidelines.

As required under the legislation, the Guidelines prepared by the DAC sets out information to be submitted by the applicant prior to any recommendation and decision on the application. The Guidelines identify development assessment matters which are set out on a ‘scale of risk’ which really translate the order of how important specific matters are in relation to the overall assessment. Several of these risk matters are reviewed in this assessment.

The proposed built form includes:

- A podium of 11.2 metres comprising the following levels
  - > Four levels of car park constructed on the rear boundary (with some exceptions) providing publicly accessible spaces and dedicated tenant spaces (incorporating loading and plant areas at ground level)
  - > Three levels (up to the same podium height) across the 'front' elevation, with the two upper podium levels (marked Level 1 and 2) built on or close to the alignment of the Adelphi Tce, Canning St (south) and George St (north) allotment boundaries
- 10 levels above podium height comprised of apartments, hotel rooms, penthouses and various hotel related facilities
- An additional plant level

URPS was instructed to review the proposed Major Development application detail. The Strata specifically sought opinion on whether the scale and design of the development would unreasonably impact on the views highly valued by the Aquarius Apartments residents. An overall assessment of the scale and height of the development in the context of off-site impacts on the established character and amenity of this locality was also considered.

Following our initial assessment of the proposal against the Holdfast Bay Development Plan which found that there was a significant departure from a range of built form and design objectives applicable to this site and locality, URPS also sought architectural advice. This is considered appropriate as it is acknowledged that the authority is not strictly bound by the Development Plan, and that the urban design considerations would assist in our analysis of the development against the Development Guidelines.

In preparing this representation and for the purpose of instructing architect Francesco Bonato of Tectvs, URPS conducted an inspection of apartments on Level 6 and 12 of the Aquarius Apartment building to get an appreciation of the locality, living arrangements/floor plan, short and long range views, relationship to the development site. This building is a similar height and number of storeys to the building proposed in the application. URPS was also provided floor plans by the Strata Photographic records of various features were collected for consideration by Tectvs and URPS' own analysis along with the application details.

### **Established Built form character of High Rise**

The height, set-back, site coverage and articulation of building facades is important on any site fronting Adelphi Tce particularly as the proposed development could act as the impetus for development of other allotments along Adelphi Tce in a similar way. Development on corner sites also requires thoughtful design to account for views, vistas and the established character of built form relationships to the street forming part of the desired character of a locality.

Both the Major Development site and the Aquarius Apartments site are in the Urban Glenelg Policy Area 15 of the Residential High Density Zone and the differences between the two applicable precincts are:

- Precinct 4 - Five (5) Storeys – should not exceed 17.5m in height (applies to the Aquarius Apartments land but can be assumed to not have applied at the time of construction in 1980-81)
- Development Site – Precinct 3 – Three (3) Storeys – should not exceed 10.5m in height (ie less than the proposed 11.2m podium height)



The other Precinct in this Policy Area is Precinct 5 - Twelve (12) Storeys – envisaging buildings set on podium up to maximum height of 10.5m, with overall finished height of 42 metres.

The Aquarius Apartment building which is more consistent with the Precinct 5 development outcomes, has an appropriate relationship to its corner in terms of height and setbacks, and is specifically designed to address the north/northwest views. There are 12 apartment floors, one ground level parking floor and an undercroft parking level.

The proposed development's impact on the line of site currently enjoyed from the Aquarius Apartments balcony area in the north west corner of each level, north/north-west along the length of Adelphi Terrace is of particular concern. These are identified on the attached annotated plans and photos.

The only part of the outdoor space of each apartment (one apartment per level) that provides any useable outdoor living space is orientated to take advantage of this view corridor. This outdoor space is directly accessible to the internal living areas which are located on the same side of the building, so the vista is important from within the apartments themselves. All other views to the coastline directly west have been blocked (although not to all upper levels) by more recent medium-high rise building construction along the coastline over time (west of the adjacent park lands).

The abovementioned line of site illustrated on the attached plan is of particular importance to the residents of Aquarius Apartments across all levels in order to retain at least one viewshed encompassing the north/north-west which includes water and the bridge, framed by and including the built form edge of Adelphi Tce allotments.

### Neighbourhood Interface

The evaluation of impacts of the Major Development on the locality, taking into account its height, scale and interface relationship to neighbouring development is rated Critical in terms of level of risk assessment.

### Viewsheds

The proposed Major Development results in a dramatically different visual impact on its locality compared to the Aquarius Apartments, the only other building of similar height in the immediate locality.

By reference to Precinct 3 of the Urban Glenelg Policy Area that the viewshed to be 'protected' is described as *"views of the sea and waterfront from the front of any existing building of any existing building"*.

Having regard to the floor plan and orientation of the indoor and outdoor living areas addressing the north-west corner of the Aquarius Apartments, it is my opinion this view as defined on the attached annotated plan is one to be protected and is the *"front"* based on the design of the building.

Representors should also be afforded equal opportunity to depart from Development Plan descriptions of views to be protected in this zone. The Development Plan 'qualifications' of what constitutes reasonable view protection should *not* take precedence over the design of the Aquarius Apartments which has an appropriate relationship to its corner in terms of height and setbacks, and being purposefully designed to address the north/northwest views.

Notwithstanding the departure from a number of key Development Plan objectives, of particular relevance to the Aquarius Apartments residents is the undesirable impact on the outlook enjoyed from the main living

areas as per the attached annotated plan. In order to appropriately address the amenity of the living areas and views of Aquarius Apartments the built form should be setback in accordance with the alignment shown on the attached plan. The oversized podium height (by reference to the 10.5m maximum podium height in Precinct 5 which envisages 12 storeys, as opposed to this Precinct 3 which envisages 10.5 metres being the maximum height of all buildings) interrupts this vista from the first living level. The design of the built form at the southern end swings forward at a number of levels (6, 7, 8, 10 and 11), bringing the structure forward over the podium level towards Adelphi Tce. The purpose of the podium to reduce the sense of an overbearing tower built close to the boundary is not achieved at the southern end of the proposed development. This outcome is at the expense of the outlook enjoyed by the Aquarius Apartments residents.

Tectvs has provided advice (copy attached) on one way that specific objection can be overcome through a change in the 'swing through' from the west (forward) of the principal facade to the east (towards the rear of the development site). This is an appropriate design response in any event, as the general design principles for high rise buildings so not envisage 'tower' elements being set-forward of the podium or closer to the street. If the swing through is not appropriate to the west, then it should be dispensed with across all floors on both elevations.

Importantly the urban design advice indicates support for URPS' view that the effect of the change of direction of the cantilevered component at the southern end of the building does not significantly exacerbate any visual or other impact on these adjoining / adjacent allotments to the east. This is in the context of the design of the proposal already being in stark contrast to the overall height (storeys) and height of development on the boundary of the Residential Character Zone to the east in Canning Street.

If this amendment cannot be achieved, for example if it is argued by others that the impact is unreasonable in terms of built form relationships and extent of off-site impacts to the east, then it can be interpreted that the Major Development in the current proposed form constitutes overdevelopment of the site. If a change to overcome a reasonable objection results in new or additional matters of concern to others, or compromises the achievement of other important design objectives in relation to other land, it is reasonable to interpret the proposal as overdevelopment of the site.

### Shadowing

One of the impacts of the extent of the proposed built form running almost the length of the allotment is the overshadowing of the neighbourhood. The expressions of Desired Character for the development site's Residential High Density Zone – Urban Glenelg Policy Area 15, envisages *"a higher degree of overshadowing and loss of privacy is expected in the policy area given the medium-to-high density nature of development (and heights)."*

To that end, the Aquarius Apartments could potentially expect some change to its solar access on its north side. However if it was 3 storeys as envisaged under the current Development Plan, an appropriate building set-back of development on the development site would effectively avoid shadowing that northern facade where the balconies and living areas are located. The shadow diagrams are not clear as to the extent of floors affected by overshadowing, but any shadowing of the northern facade is undesirable and is only as a consequence of an inappropriate building setback on the southern boundary. This is consistent with the architectural advice attached recommending a more respectful urban treatment for the south-east corner of the development site.

However the extent of overshadowing to other parts of the neighbourhood to the east is significant in terms of its change in afternoon sun access. For some allotments that change is significant year round. This is a direct consequence of the building not mirroring the attributes of Aquarius Apartments which is designed to have less overshadowing impact as a consequence of its corner setback and dimensions, despite its overall height. While some residential properties may achieve 2-3 hours of sunlight access to residential properties, the dramatic loss of the solar access is a significantly poor amenity outcome for those residential premises, as a consequence of overdevelopment of the site.

The impact is a direct consequence of the building exceeding the desired height / storey provisions under the current Development Plan. Other design features envisaged in the Development Plan for high rise developments in order to reduce the overall height which causes the overshadowing include:

- Basement / under croft parking (noting the Aquarius Apartments incorporate at least one basement parking level) which could then reserve the podium floor area for other intended uses, lessening the total number of floors, the extent of floor area on each floor, and providing scope for increase building setbacks from at least 3 or all site boundaries
- Reduce the total number of apartments and or hotel rooms

A reasonable alternative is a medium rise, high density development option or a development in accordance with the current Holdfast Bay Development Plan provisions for the Urban Glenelg Policy Area 15 – Precinct 3 Three Storeys.

### Car Parking and Access

A specialist traffic assessment report by MFY has been provided by the applicant in accordance with the Development Guidelines. Although not specifically rated in terms of risk in the Guidelines, these matters fall within the 'Neighbourhood Interface' category given the increased development proposed can result in off-site impacts. It is therefore within the 'Critical Assessment' risk category. Key points are summarised below, representing different opinions to those expressed in the DR and/or require further clarification.

### Site Access

The Major Development proposal changes the access arrangements, proposing to rely on 2 side street entrances for vehicles.

1. The DR (pg 38) suggests the best place for the car park is the northern boundary (George St access) with respect to sensitive receptor sites. That opinion is not supported as Adelphi Tce is the best location from a sensitive receptor basis. A central access on the Adelphi frontage would be away from all existing sensitive receptors in side streets. The new building best placed to be designed to mitigate noise impacts from its own activities. The acoustic assessment related to road traffic noise details how the new built form can be designed to mitigate noise, noting the design criteria will not be achieved with windows and doors open.
2. One or two access points on the Adelphi Tce frontage will still be an improvement to the existing conditions based on the comments in the MFY.
3. The Aquarius Apartments will be less impacted by the car movements at the George St car park access, but these same vehicles will add to the existing noise on Adelphi Tce which is already described in the Acoustic Assessment as "dominating" the noise environment on that street.

4. The side street access is likely to be less visually apparent to motorists (particularly tourists) and may result in more traffic circulating around the neighbourhood particularly Canning, Sturt and George streets. This would be to the detriment of the lower order residential streets.
5. Section 5.8.4 of the DR summarises the traffic assessment conducted by MFY Pty Ltd. Acknowledging URPS has not sought any independent traffic advice, it is questioned whether the traffic generation rate (estimated) of only 0.32 car trips per residential apartment occur each day is an underestimate. It was concluded by MFY that the estimated additional number of car trip to/ from the development will not put any pressure on the surrounding road network. It is evident that Adelphi Terrace is a single lane road commonly used as a thoroughfare for residents outside the area travelling to/ from surrounding suburbs including West Beach and Henley Beach. It is also used as an alternative route to Tapleys Hill Road for Glenelg residents travelling south via the airport. There is no provision for any turning lanes for cars entering or leaving the development via George Street. This will likely cause major delays during peak periods. Furthermore the additional parking proposed along the Adelphi Terrace street frontage will further diminish the visibility for vehicles turning out of Canning Street.
6. The new Canning Street access represents a new intrusion to the noise environment opposite Aquarius Apartments in that local side street. While there will potentially be less vehicle movement at this loading entry/exit compared to George St, the types of vehicles are potentially larger and noisier. In this area there are plant rooms, a transformer, waste storage, bin wash and unloading areas at ground level. There is scant detail on the materials and ventilation requirements for this section of the south elevation or the door to the loading bay. The potential noise impacts are therefore not clear in this regard. It is noted that the Acoustic Assessment is clear that the car park noise will affect residents to the east, hence there is some potential for ventilation and openings to form part of the facade thus contributing to noise impacts beyond the site.
7. The opening on the Canning Street crossover is positioned on the allotment boundary. Vehicles will either need to idle in the driveway of street to wait for roller door access. If the access door remains open for ease of access, then the internal noise sources are potentially directed straight across to the dwelling opposite which is not desirable.
8. The loading access is approx. 8.0m wide and although turn paths of the potentially largest vehicles appear adequate within the building itself, a vehicle entering the driveway cannot see a vehicle or vehicles in the loading bay from the entry point.
9. It is unclear whether one vehicle can enter and exit in a forward direction while another vehicle is parking in the loading bay.
10. A one-way drive through with an internal passing bay is considered a better approach. It would provide less risk of commercial and waste vehicles idling in the street or across the Canning Street footpath. It is acknowledged this would require a redesign of the ground level at the southern end of the building, and the retention/relocation of an existing driveway on Adelphi Tce, but nevertheless possible. It would reduce any undesirable impact (eg noise, vehicles idling in the street) on Canning St if it was at exit only at that access.
11. The 5 only daily trips to the loading dock seems unusually low having regard to the wide range of on-site activities, the number of hotel room and dwellings, the total retail floor area and no

obvious on-site laundry facilities (unless in 'plant' rooms). The assumptions used as the basis for this low number of daily trips should be clarified.

### Parking

1. The parking assessment has in some instances applied the Development Plan rates for certain activities and in other cases different lower rates are applied based on trends in parking demand. It is not clear whether the 65 FTE hotel staff identified in DR section 5.8.3 are considered in the parking demand estimates. Clarification as to the impact of demand for staff parking is warranted, given existing staff demand is understood to be only 30 FTE.
2. It is noted the existing development has 70 on-site spaces which is theoretically equivalent to 1 per existing hotel room in the existing complex. It could be argued that most staff and visitors to the conference facilities and dining facilities have been relying on on-street spaces. No estimates or surveys of on-street parking are cited, so it is not possible to ascertain to what extent the change in staff parking affects on-street parking.
3. The proposed development applies a demand rate of 0.25 space per hotel room which is theoretically a significant reduction based on existing spaces per room.
4. For the 60 apartments there is a theoretical demand for 82 spaces (Table 5.1, pg 32) yet only 77 dedicated spaces (DR section 5.8.3).
5. Having regard to the above, and noting the reduced rates applied to retail, the authority must satisfy itself that the use provides sufficient on-site parking for its potential demand.
6. If demand is not met there will be greater traffic circulation in the local streets in this neighbourhood. Most dwellings have competing demand for visitor parking on-street.

### Summary of Key Points

Land owners and residents in this locality have reasonable and justifiable concerns that the overall form and scale is Major Development negatively impacts on neighbourhood character and amenity. It is a significant departure from the envisaged and established scale of development, resulting in consequential off-site impacts.

Of particular concern to the Aquarius Apartments residents is the fact that this application has been lodged before the State Government has released draft Development Plan Amendment policy changes that is being considered for allotments fronting Adelphi Terrace (among others). The local community has not had an opportunity to review and comment on draft policy (a requirement under the Development Act and Regulations) but is being asked to consider a built form outcome that is significantly different from current Development Plan policy. This application is premature at best as there is no certainty that the pending Development Plan Amendment will ultimately introduce a 'high rise' policy for the development site. If it does, to what extent the high rise could be capped at or limited to specific sites or localities is yet to be determined:

- having regard to the constraints presented by the narrow allotment depths fronting Adelphi Terrace, such as those comprising the development site

- by reflecting on public submissions in response to the Public Exhibition DPA, noting there are numerous residential premises that are more seriously affected by the significant overshadowing impacts arising from this Major Development.

Based on an assessment against the current Holdfast Bay Development Plan it is considered seriously at variance with the provisions and it could not be approved under the conventional assessment pathway in this circumstance.

It is acknowledged that the Development Plan is not relied on exclusively in the assessment of a Major Development. Putting aside the quantitative provisions for height and setbacks for the benefit of the developer, allows for the assessment to also defer to valid representors' interpretations of what will impact on established amenity instead of Development Plan or other guides with defined qualifications related to visual / interface relationships / lines of sight to be considered in response to new development.

Not all the proposed land use activities are within the "small scale" parameters envisaged for this part of the established residential area of Glenelg (eg entertainment venue, shop, restaurant) and coupled with total number of hotel rooms and dwellings, the character and amenity of this locality becomes more like an activity centre rather than a residential area.

Amenity is defined in the Development Act as *"any quality, condition or factor that makes, or contributes to making, the locality of building harmonious, pleasant or enjoyable"*.

A different design involving one or two individual and smaller towers of the proportions more like with the character of the Aquarius Apartment form of high rise development is one way that may overcome the objection to the overall scale of the built form. An alternative design of this form or one with greater building setbacks combined with less floors would provide opportunities to maximise solar access over a longer afternoon period throughout the year, reducing the significance of the dramatic overshadowing impact on this neighbourhood. A design change of this kind will still have an effect on the neighbourhood amenity but not to such an unreasonable extent evident in this proposal. If this is not an alternative design outcome will satisfy other design and commercial/economic objectives, then arguably the site conditions do not suit the higher density outcomes.

If the Major Development is to be supported, as a minimum, the Aquarius Apartments seeks the 'swing through' floors at the southern end of the built form to be deleted from the proposal and or designed to turn to the east to protect the important vista that its indoor and outdoor living areas have been designed to address.

Aquarius Apartments owners / occupiers and/or its representatives would be pleased to meet and discuss any aspect of this submission should you need clarification of the above or if any opportunity is extended to representors to appear before those preparing a recommendation in relation to this development.

Yours sincerely



Julie Lewis  
**Senior Associate**

Enc Tectvs Architectural Statement  
Annotated Plans and Photos

FB: FB

22 October 2015

**URPS**

154 Fullarton Road  
Rose Park SA 5067

[julie@urps.com.au](mailto:julie@urps.com.au)

Attention: Julie Lewis

Dear Julie

**DESIGN ADVICE 6 – 10 ADELPHI TERRACE GLENELG  
VISUAL OUTLOOK**

At the request of URPS who is acting on behalf of the Aquarius Apartments, we have been asked to review the visual outlook from the Aquarius Apartments and the impact of the proposed development at 6-10 Adelphi Terrace Glenelg.

The apartments and their primary living space look to the North in the general direction of Adelphi Terrace and the Patawalonga River.

The proposed development is of a substantial scale and will significantly curtail this northerly outlook. The development proposes what is described as a tower above podium level. The podium at ground and C01 floor levels is setback approximately 2m - 3.5m from the Adelphi Tce allotment boundary. Levels 1 and 2 align with the front Adelphi Tce boundary. Above podium level the front elevation of the additional 10 floors of hotel/apartment levels is generally setback 6m from the Adelphi Tce frontage. The exceptions are levels 6, 7, 8, 10 & 11 which come forward within approximately 2.0 metres of the Adelphi Tce allotment boundary. In turn this brings the south elevation of these levels very close to the alignment of the Canning St allotment boundary.

To that end, it is proposed that instead of the tower floors cranking forward towards the front of the site (a Westerly direction) they are reversed and instead crank to the rear towards the East of the site.

This would serve to effectively open the vista from the apartments and mitigate the impact of the proposed development on the visual outlook from the apartments. This is illustrated in the sketch attached.

It should be noted that this also serves to reduce the impact from street level and along Canning Street, by the tower portion in effect turning the corner rather than as presently proposed which effectively truncates the corner. This would be a more respectful urban treatment, much in the same way that the existing Adelphi Apartments are respectfully set back from both Adelphi Terrace and Canning Street corner.

Also note, the three storey podium level occupies much of the Eastern and Southern boundary. The siting of the built form on or very close to these boundaries has its own effect on the amenity of the adjoining allotments to the east and the Canning Street streetscape. The impact of reversing the cantilevered floors (levels 6, 7, 8, 10 & 11) to the east (rear) of the site as recommended above to promote a more respectful urban treatment of the Canning St / Adelphi Tce corner, is not likely to significantly exacerbate any visual or other impact on these adjoining allotments to the east beyond the impact arising from the design siting and overall height of the development proposal. If there is a need to address visual amenity to the east as a consequence of the proposed change, there are various design responses available to manage the visual amenity of adjacent properties to the east.



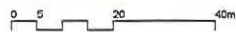
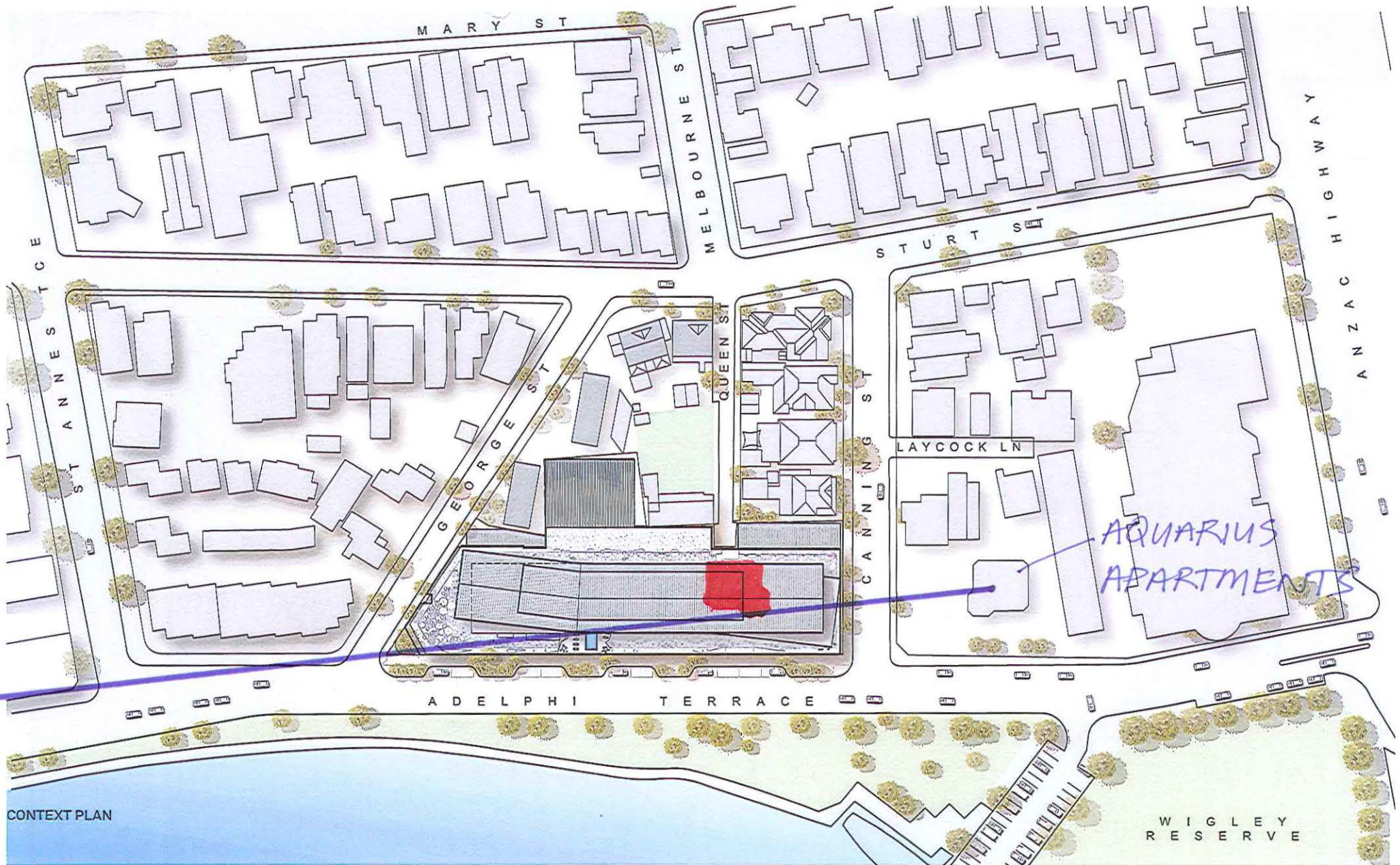
We trust this assists in the assessment of the proposal and feel free to contact us should you require further commentary or evidence in support of this proposal for a more respectful urban treatment to mitigate any negative impacts on the established character and amenity of this corner setting and the view corridor currently enjoyed by the occupants of the Aquarius Apartments, a building which has been specifically designed to enjoy the unique outlook.

Yours sincerely

A handwritten signature in red ink, appearing to read 'F. Bonato', with a long horizontal flourish extending to the right.

**Francesco Bonato** BArch(Hons)(Adel) LFRAIA FDIA  
Adjunct Associate Professor, School of Architecture & Built Environment, University of Adelaide  
Director  
for Tectvs Pty Ltd

Encs – Mentioned



Revision  
A - DEVELOPMENT APP.

Date  
14-08-2015

Scale  
1:500@A1  
1:1000@A3

Client  
Bruno Marveglio

Project Name  
Marina Regency Hotel &  
Apartments  
6-10 Adelphi Terrace  
Glenelg SA

Drawing  
SK6-0100  
CONTEXT PLAN

— PRINCIPAL VIEW TO BE PROTECTED

■ APPROXIMATE MIRROR IMAGE OF AQUARIUS APARTMENTS BUILT FORM RELATIONSHIP TO CORNER

JING  
STREET

CANNING STREET

TERRACE

ADELPHI

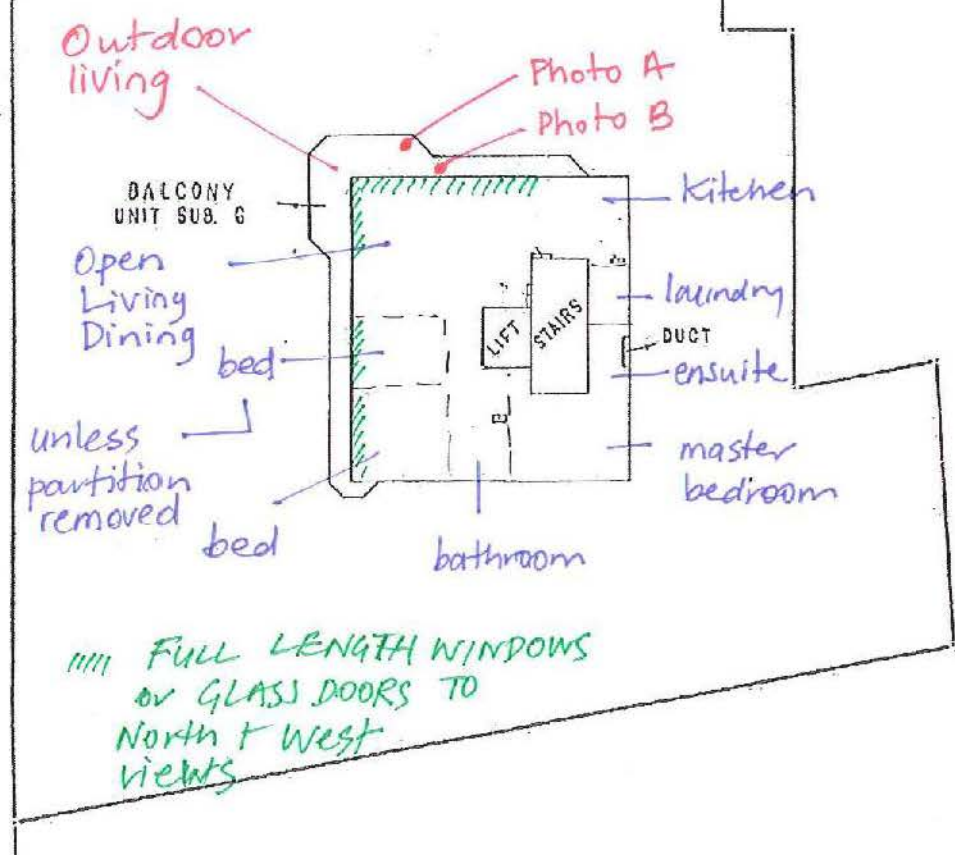
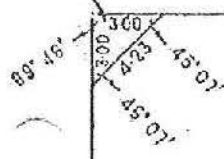


Photo A  
Photo B

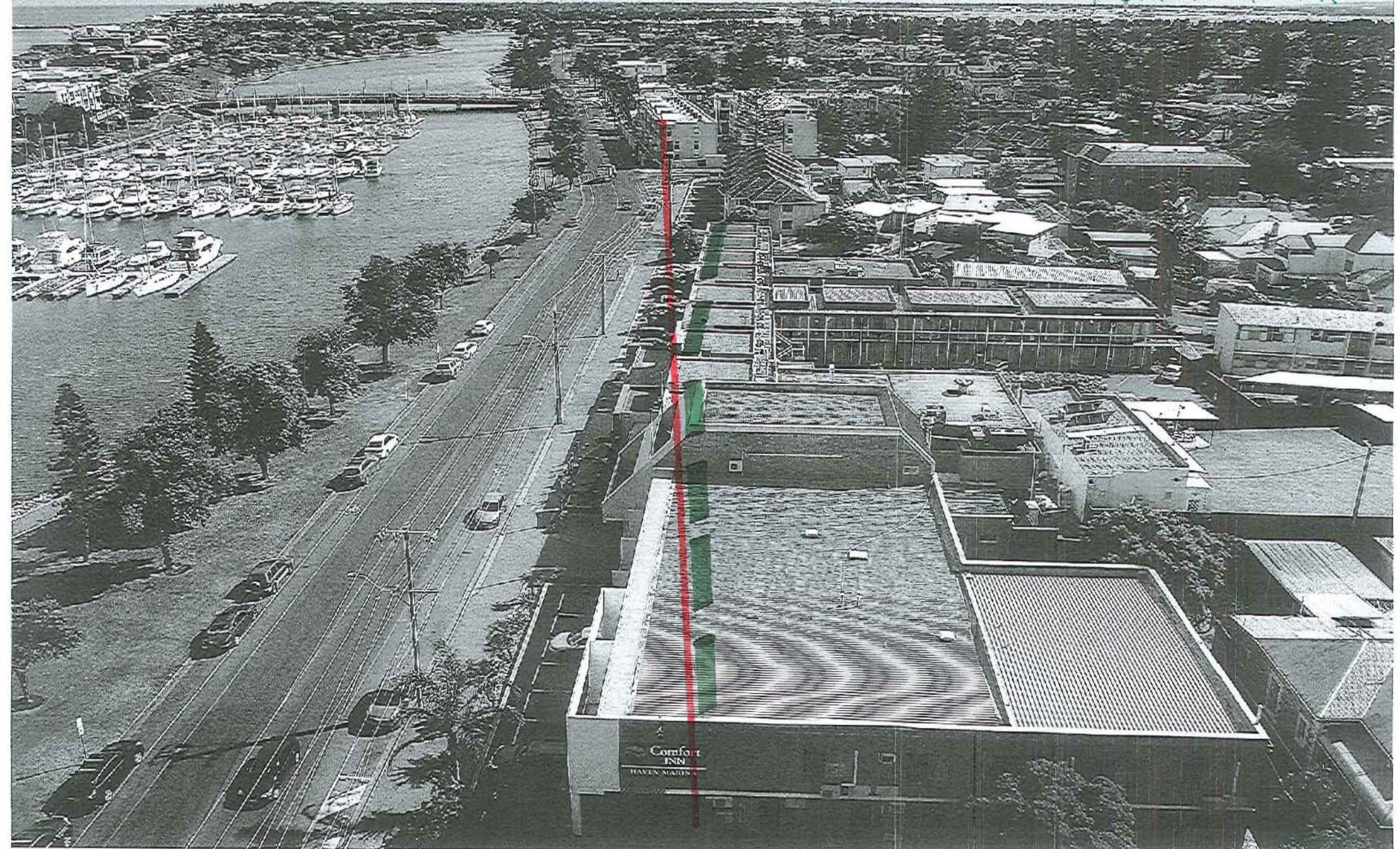
# TYPICAL FLOOR PLAN

+ LEGEND TO PHOTOS  
A + B



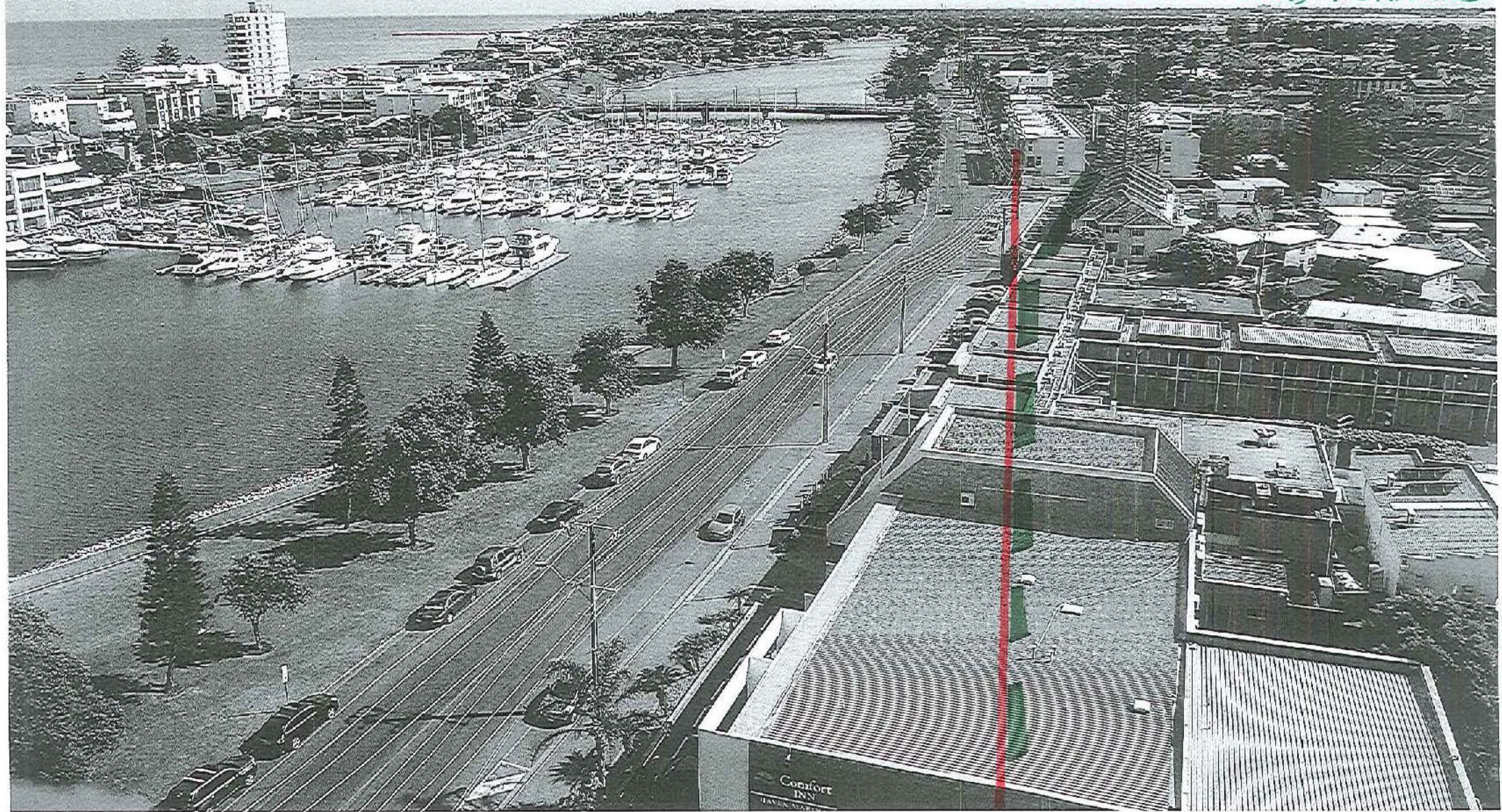
# VIEW LINE PHOTO A

DESIRED MINIMUM PODIUM SETBACK



# VIEW LINE PHOTO B

NO TOWER ELEMENT OR  
CANTILEVERED FLOORS FORWARD





27 October 2015

Minister for Planning  
c/- Robert Kleeman, Unit Manager, Crown, Major  
Development and Grants  
Department of Planning, Transport and Infrastructure (DPTI)  
GPO Box 1815  
Adelaide SA 5000

Dear Sir

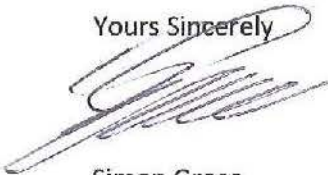
**Re: Major Development Application 6-10 Adelphi Terrace, Glenelg**

I have been engaged by Bruce and Kathy Richardson residents of Unit 2/7 Canning Street, Glenelg North on behalf of Strata Plan 4424 to prepare a written submission concerning the redevelopment of the Comfort Haven Inn Marina on Adelphi Terrace, North Glenelg. The Strata consists of Unit 1/7 Canning Street and Unit 2/7 Canning Street, Glenelg North.

The Richardson's unit faces Sturt Street on the corner of Queen Street. The other unit, 1/7 Canning Street, Glenelg North is owned by Mark and Karen Grundy whose unit is on the corner of Canning Street and Sturt Street. Both the Richardson's and the Grundy's are not opposed to the redevelopment of the Comfort Haven Inn. It is the height and large mass of the development that they object to because it is contrary to the Holdfast Shore Development Plan and will have a detrimental impact on their property and the surrounding area.

Please refer the attached Submission that we believe address their concerns fairly. We are prepared to release the attached submission for public information and/or provide any further information if required.

Yours Sincerely



Simon Grose  
Advantage Planning Services

# Planning Submission

**To: The Minister for Planning**

**Concerning: Major Development Application 6-10 Adelphi Terrace, Glenelg**

**City of Holdfast Bay**

**Proposal: To redevelop the existing Comfort Haven Inn Marina site with a new 12 storey, four and a half storey hotel and conference hotel and conference facilities, associated retail, residential apartments and car parking**

**Submission: On behalf of B & K Richardson of Unit 2/7 Canning Street, Glenelg North and M & K Grundy Unit of 1/7 Canning Street, Glenelg North.**

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Adelphi Terrace frontage of existing Comfort Haven Inn Marina Motel



Prepared by Advantage Planning Services

## **Background**

Advantage Planning Services have been engaged by B and K Richardson who reside at unit 2/7 Canning Street, Glenelg North to prepare a submission for both themselves and M and K Grundy, who reside at Unit 1/7 Canning Street, Glenelg North, concerning the proposed redevelopment of the Comfort Haven Inn Marina Motel located at 6-10 Adelphi Terrace, Glenelg North. The Richardson's reside on the corner of Canning and Queens Street and the Grundy's reside on the corner of Canning and Sturt Street both located behind (east) of the Major Development Application at 6-10 Adelphi Terrace, Glenelg North for the Marina Regency Hotel.

Neither party object to the proposal to demolish the existing two storey motel and construct a hotel and apartments including café/bar, retail complex, outdoor recreation facilities and car parking. What is objected to is the height (12 storey) and mass of the proposed development which is so far in excess of what the Holdfast Bay City Development Plan permits that this will create problems with overshadowing, overlooking, traffic and car parking.

## **Location**

The subject site presently the two storey Comfort Haven Inn Marina Motel is on a large 5175 sq metres site with a long frontage (131 metre frontage) to Adelphi Terrace and also substantial frontages to George and Canning Streets, 47 and 39 metres respectively. The current motel is a two storey building constructed in the 1970's which looks out over the Patawalonga Basin to Holdfast Shore. With reference to the Holdfast Bay Development Plan the subject land is located in the Residential High Density Zone – Urban Glenelg Policy Area 15 (Precinct 3) where development up to 3 storeys in height is envisaged.

Along the Adelphi Terrace frontage in this area north of Anzac Highway is a collection of predominantly two storey motel and apartment buildings. The notable exception would be the 12 storey Aquarius Apartments constructed in the 1980's south of the subject site located in Precinct 4 where development up five storeys in height is permitted. To the rear of the land uses that front Adelphi Terrace are predominantly single storey residential land uses.

## **Consideration of the Holdfast Bay Development Plan**

### **Residential High Density Zone**

*Principle 2 Development listed a non-complying is generally inappropriate*

#### *Non-complying Development*

- *Hotel*
- *Restaurant*
- *Shops or groups of shops (except where gross leasable less than 80 sq metres)*

The hotel complete with conference facility (737 sq metres), café/bar (200 sq metres) and retail floor space (767 sq metres) are all way outside what was ever envisaged by the Development Plan and are each specifically listed as non-complying land uses in their own right. In fact Principle 3 specifically states non-residential land uses should serve the local community, be consistent with the character of the locality and not detrimentally impact on the amenity of nearby residents. This is clearly not the case with a hotel, conference facilities and outdoor recreation deck. None of these land uses will serve the local community but all will impact on the amenity of nearby residents.

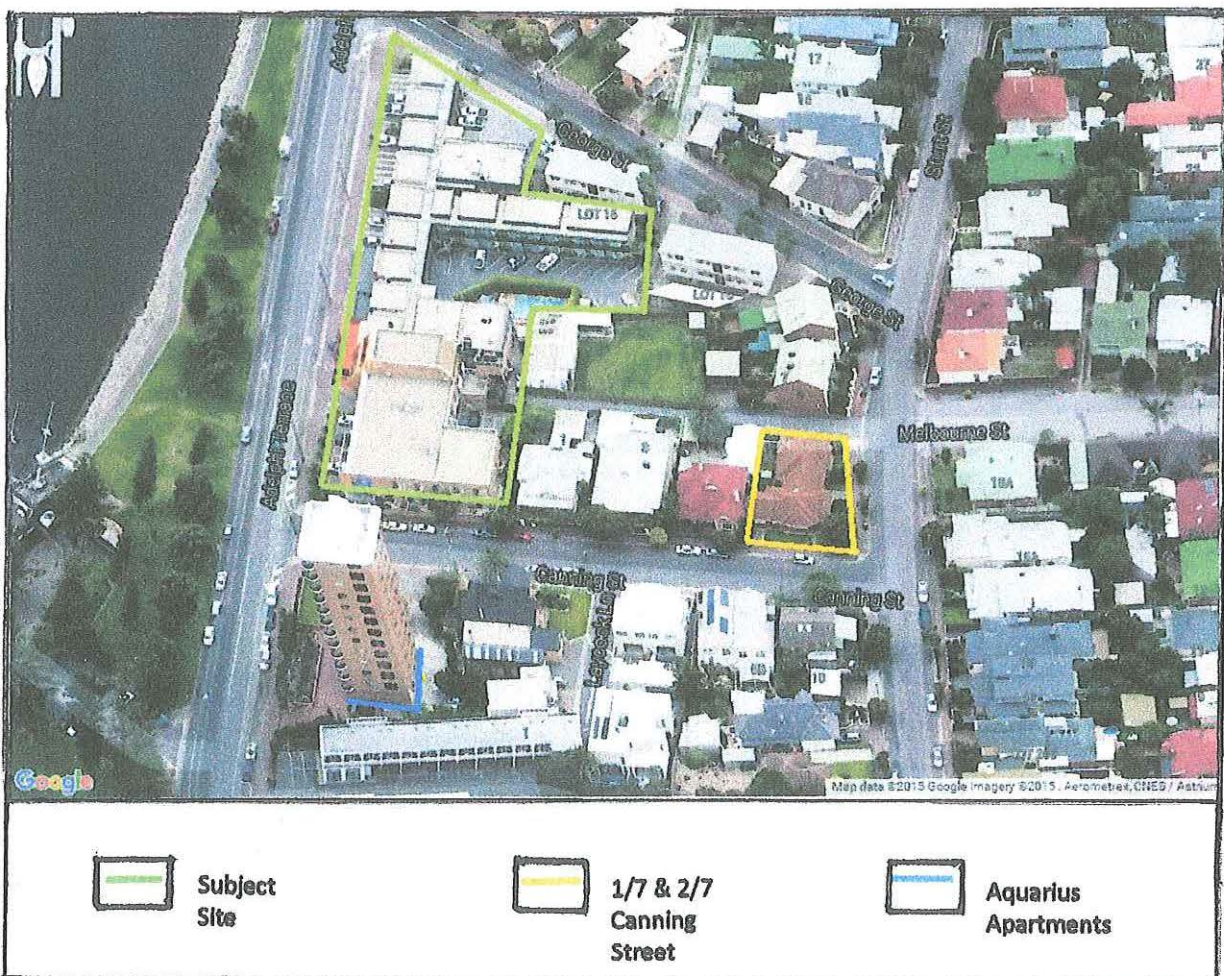


### Urban Glenelg Policy Area 15 – Precinct 3

Development in this precinct should be a maximum of three storeys in height and comprise a mix of residential development, including tourist accommodation where site conditions permit.

The existing motel building is two storeys high within an area that is predominantly single storey in height. The stated maximum building height in this portion of Glenelg North is three storey. In Precinct 4 adjacent on the south side of Canning Street the maximum building height is five storey. These sort of building heights are considered appropriate because they would not have any significant detrimental an impact on surrounding residents.

The proposal for a 12 storey new hotel is so far outside the envisaged height limits as to be completely unacceptable. Even though the Aquarius Apartments on the opposite Canning Street and Adelphi Terrace corner for the subject land is 12 storeys in height it was constructed well before the current Development Controls. Of even more relevance the Aquarius Apartments have a very small footprint (approximately 20 metres square) so its impact on surrounding amenity is much less when compared to the proposal on the subject land (refer map below – outlined in pale green). The frontage of the proposed Marina Regency Hotel is 131 metres with a depth varying from 40 to near 50 metres deep so the bulk, mass and mix of non-residential land uses in the proposed development is vastly greater than the slender apartment building. Hence the overshadowing, overlooking, car parking, traffic and noise impacts will be far greater because of the proposed buildings height, scale and intense mixture of land uses.



**Holdfast Bay Development Plan - Table HoB/1 Off Street – Parking Assessment**

A total of 204 on site car parking spaces are proposed as part of this development. This comprises 77 dedicated residential parking spaces and 127 public spaces for across the development.

With reference to Table HoB/1 and the information provided by Holmes Partners in their Development Report, there appear to be some differing interpretations of the relevant parking standards. For example the retail standard used of 4.5 spaces per 100 sq metres (within district centres) should more appropriately be 1 space per 15 square metres of floor space. Since 768 sq metres of floor space is proposed these differing standards would suggest a deficiency in retail parking of 16 parking spaces.

With reference to Hotel rooms a rate of one space per 3 rooms rather than 0.25 for each room would be more appropriate resulting in a deficiency of 13 parking spaces.

| Use                    | Quantity      | Rate             | Space                 |
|------------------------|---------------|------------------|-----------------------|
| Hotel                  | 146           | 1 per 3          | 49                    |
| Apartments             | 60            | 1/2bed and 1.5/2 | 82                    |
| Penthouse              |               | 0.2 per unit     | 12                    |
| Retail                 | 768           | 1/15 sq metres   | 52                    |
| Cafe                   | 174 seats     | 0.2 per seat     | 35 = Total 230 spaces |
| Meeting and conference | 737 sq metres | 0.2 per seat     | ?                     |

The Development Report suggested 35 spaces for the café of 200 sq metres at 0.2 space per seat is appropriate. A 737 sq metres conference and meeting room facility is provided yet only 8 spaces are proposed for the meeting rooms.

With reference to the table above the requirements add up to 230 spaces but without any proper allowance for the function/ conference/ meeting rooms. This on site car parking deficiency is substantial and not adequately explained by a bus service running along Adelphi Terrace. Both the Richardson’s and the Grundy’s attest to the present substantial short fall of on street parking in the area. This present shortfall of on street parking in the locality is made worse when public events occur and/or functions are held at locations like the popular Watermark Hotel or the other numerous tourist focused facilities in close proximity to, and including the subject site.

**Overshadowing**

Because the proposed building is elongated north-south for 131 metres both of the Units which are less than 60 metres directly east behind the proposed hotel tower will be in shadow for most of the afternoon in summer but more significantly also in winter. As acknowledged in the Development Report prepared by Holmes Partners “As a large building, the shadows cast by the proposal are considerable”.

If the buildings height was halved and reduced to 5-6 storeys, twice the height permitted by the Development Plan, this overshadowing would be insignificant by comparison.

## **Overlooking**

Both units are located about 50 metres from the rear boundary of the subject sites eastern boundary. Because the tower element of the hotel is located off the rear boundary up on a podium level the rear garden area of both Units would be approximately 60 metres from the east facing balconies of the proposed hotel tower.

The open space areas of all the dwellings located between the hotel balconies and Sturt Street to the east would be overlooked from all levels of the hotel but most clearly from the upper levels. The elevation of the upper level balconies would give guests standing on the balconies very clear views down into the houses below.

## **Conclusion**

The demolition of the Comfort Haven Inn Marina and construction of a new multi-level Marina Regency Hotel is not in itself objected to. What is objected to is the gross overdevelopment of the site. Council's Development Plan stipulates the subject sites maximum building height is three storeys, or five storey on the other side of Canning Street where the Aquarius Apartments are located.

Because the proposal is four times the permitted height (12 not 3 storeys) on a large 5175 sq metre site and comprises of hotel rooms, apartments, conference facility, meeting rooms, retails space, café/bar and outdoor facilities this will compound the impact on the amenity of the surrounding area. A building of half the height would go a long way to addressing the impact on the locality. The bulk and mass of the proposed Marina Regency Hotel which has a long frontage of 131 metres on Adelphi Terrace between Canning and George Streets further exacerbates its impact on the area.

The size, height and bulk of the proposed building will have significant overshadowing and overlooking impacts on the surround residences particularly those located directly east. The large floor area and mixture of uses proposed will create on street car parking impacts, on the already busy surrounding street, compounded by the under provision of onsite car parking.



Simon Grose  
Director  
Advantage Planning Services  
DPIT, GDRUP, GDPD, PIA and CPP

28/10/2015