

[REDACTED]

---

**Sent:**

[REDACTED]  
Tuesday, 3 March 2020 11:15 AM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Objection to the construction of a helipad in suburban Kensington, SA

Good morning

I would like to express my objection to Peregrine erecting a helipad on the roof of the proposed seven story building, scheduled for construction at 270 The Parade, Kensington, SA.

I currently live in close proximity to the proposed helipad and do not want noise of that level to be part of what is now a quiet neighbourhood.

I also believe there is a danger factor associated with aircraft landing and taking off in a busy suburban area.

Regards

[REDACTED]

---

**Sent:** [REDACTED] Tuesday, 3 March 2020 11:37 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine helipad Norwood Parade objection

Dear Sir,

As a neighbor to this new building and proposed helipad, I strongly object to the helipad being approved.

The thought of noise and safety levels above my property at [REDACTED] are most distressing. I love my peace and so do my neighbours, that's why we purchased here.

There will be enough disruption with building the huge Peregrine building.

Please do not allow the helipad to be approved.

Regards

[REDACTED]  
[REDACTED]  
[REDACTED]



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.



What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other

Parent from Marryatville High School

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

I have safety concerns for my child and other children /parents/ staff at Marryatville High School in the event of an emergency landing.



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

*Dis allow the use of Marrayatville High School  
as an emergency landing*

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
c/- Robert Kleeman,  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

or via email to: [ma'ordevadmin@sa.gov.au](mailto:ma'ordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure

[REDACTED]

---

**Sent:** Tuesday, 3 March 2020 1:37 PM  
**To:** DPTI:State Commission Assessment Panel  
**Cc:** bragg@parliament.sa.gov.au; rbria@electedmembers.npsp.sa.gov.au;  
cmex@electedmembers.npsp.sa.gov.au; jcallisto@electedmembers.npsp.sa.gov.au;  
dunstan@parliament.sa.gov.au; Kensington Residents' Association  
**Subject:** Proposed heliport - Portrush Road and Parade corner

I write to voice my wife's and my deep concern about, and complete opposition to, the proposed helipad mooted by Peregrine Corporation for the top of their yet to be constructed building on the corner of Portrush Road and The Parade.

My wife and I live in [REDACTED] Kensington, within approximately 600 metres of the proposed development, and are therefore more than likely to be directly affected by it should it go ahead.

We note that a number of grounds have been identified as possible landing places if a helicopter experiences an emergency - these are all, with one exception, school ovals. The danger to children is obvious. One of these landing grounds has been identified as the Marryatville Primary School oval, which has a high voltage power line running across the middle of it.

There are two schools within 200 metres of the proposed building; one lies directly under the helicopter's approach flight path as outlined by the helicopter company's representative at the recent public meeting held at the Norwood Town Hall.

There are also heritage buildings on the three other corners of the Parade/Portrush junction, one being an active church, a second being a local community centre. Helicopters should not be landing and taking off in proximity to such buildings

We also note that the proposal is for use of the helipad on 10 days of the year, but with "multiple trips" on each of those days, as stated by a Peregrine representative at that meeting.. This adds up to something like 100 trips per year - 100 low level approaches and take-offs over homes and schools.

Peregrine representatives tried to convince the meeting that this operation would have a material economic benefit to the community and that the company is a good community citizen. We fail to see what benefit would accrue to our local community from flying dignitaries and VIPs to and from the Peregrine racetrack at Tailem Bend. Are these people likely to spend money on the Parade or in surrounding businesses? There is no logic in bringing these people from Adelaide Airport (assuming they come from interstate or overseas) to Kensington and then flying them from Kensington to Tailem Bend. The sensible and more economic option would be to fly them direct from the airport.

Apart from this local residents would have to endure intense noise and the possibility of a major air disaster in a fairly dense residential area, to indulge a whim of a wealthy person.

We submit that a helicopter landing pad has no place in high density residential areas such as Kensington, Norwood and Beulah Park, and that the public interest would not be served by approving it.

Thank you for your attention

[REDACTED]

██████████  
**Sent:**

████████████████████████████████████████  
Tuesday, 3 March 2020 2:28 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Stop Peregrine Helipad

Where is this helipad to be located?

If it's based in the foothills flying to Tailern Bend over open space then this changes matters but personally, I am against anyone flying helicopters for personal/business use over residential areas *excluding emergency health helicopters of course*.

How has this application even reached this stage? If this is approved then does it mean it gives other corporations opportunities to apply.

It's a NO from this NPSP ratepayer.

[Redacted]

**Sent:**

Tuesday, 3 March 2020 2:58 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Stop Peregrine's Helipad

Could my objection to the Peregrine company being granted a heliport licence to land in future on a development on the corner of Portrush and Norwood Parade Norwood/Kensington please be noted.

While there are noise issues etc associated with this proposed development the fact that it is in the vicinity of multiple schools and should something go wrong it could threaten safety on any of these sites is of even greater concern.

There really is no necessity for a commercial enterprise to be allowed such a development.

Thanking you in anticipation

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

[REDACTED]

[REDACTED]

**Sent:**  
**To:**  
**Subject:**

[REDACTED]  
Tuesday, 3 March 2020 3:16 PM  
DPTI:State Commission Assessment Panel  
Major Development Proposal - Variation 2 Helicopter Landing Facility

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**What is your interest in this proposed development?**

- **Neighbour**
- **Local Resident**
- **Landowner**

**What is your overall position on the proposed development?**

- **We oppose the development**

**Do you have concerns regarding the proposed development?**

- **Safety Risks - there will be an accident! We live on the proposed flight path, 160 metres from the proposed facility.**
- **Noise Levels - very disruptive - doubts on Sonus soundwave predictions over our house.**
- **Hours of Operation - 7am to 10.00pm? (10.00pm is not daylight hours)**
- **Number of Days and flights per day.**
- **Emergency Landing locations at school ovals.**

**What could be done to address your concern?**

- **The Helicopter Landing Proposal is not to proceed.**
- **All helicopter flights are to originate and finish at the Adelaide Airport without the need of a helipad at the Peregrine facility.**

**Other General Comments:**

- **The Peregrine Helipad proposal is not to be confused with Emergency / Rescue helicopter flights to Hospitals.**
- **The health and safety of people in the vicinity of the proposed landing facility and beyond outweighs the questionable economic advantages.**

Please provide an acknowledgment that indicates our thoughts have been received.

Yours sincerely,

████████████████████

[REDACTED]

[REDACTED]

[REDACTED]

**Sent:** Tuesday, 3 March 2020 3:59 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Stop Helipad on corner Norwood Parade and Portrush Road

Tuesday 3/3/20

[REDACTED]

[REDACTED]

[REDACTED]

Minister for Planning  
C/- Robert Kleeman  
Department of Planning, Transport and Infrastructure GPO Box 1815, Adelaide.

Dear Sir,  
I believe the proposed Helipad on the Peregrine Building would be a detrimental step for the local Norwood, Kensington and Beulah Park residents and city of Adelaide.  
The proposed area which is already a busy intersection with 24 hour truck and car access, and developments proposed to increase the density of housing and residents, would be in danger of possible crashes and terrible noise pollution. Viable options during "catastrophic engine failure" proposed are school oval sites which is also extremely dangerous.  
We have airports within easy proximity to their premises and it would not be too out of their means to have limousines drive their guests to where ever they desired rather than landing on their building.  
All helicopters should land and take off in an airport facility. Please make the correct decision and deny the development application. A 7 storey building on that busy corner is a big enough blight without the danger and noise of helicopters.

Yours sincerely,  
[REDACTED]

[REDACTED]

---

[REDACTED]

**Sent:**

Tuesday, 3 March 2020 4:36 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Objection to construction of a helipad in suburban Kensington

Good afternoon

I would like to express my objection to Peregrine erecting a helipad on the roof of their proposed seven story building, scheduled for construction at 270 The Parade, Kensington.

I live close by in Kensington and therefore close to the proposed helipad. I do not want the anticipated level of noise occurring in my quiet neighbourhood.

I believe that there is a high danger level when aircraft land in a busy suburban area.

Regards

[REDACTED]  
|  
[REDACTED]

[REDACTED]

---

**Sent:** [REDACTED] Tuesday, 3 March 2020 4:37 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Opposition Peregrine's Helipad

Minister for Planning  
c/- Robert Kleeman  
Department of Planning, Transport and Infrastructure  
Email – [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Minister for Planning – As a rate payer in City of Norwood and St Peters and the City of Burnside, I advise that I am opposed to the approval of the proposed Peregrine's Helipad on the corner of Portrush Road and The Parade Norwood – we have an airport for a good reason.

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

---

**Sent:**

[REDACTED]  
Tuesday, 3 March 2020 4:47 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Proposed Peregrine Helipad - Norwood

**For Attention:**

**Minister for Planning,**

**c/- Robert Kleeman**

Dear Sir,

Just a brief note to advise that as residents living quite close to the proposed site of the above proposed development, we do **NOT** support the Helipad proposal on Peregrine building located on the corner of Portrush Rd and the Parade, Norwood. The proposal is grossly inappropriate for a residential area and should NOT be approved under any circumstances.

Yours Sincerely

[REDACTED]  
[REDACTED]

[Redacted]

[Redacted]

**Sent:**  
**To:**  
**Subject:**

[Redacted]  
Tuesday, 3 March 2020 5:18 PM  
DPTI:State Commission Assessment Panel  
Peregrine Helipad -Opposed to proposal

Minister for Planning  
c/- Robert Kleeman  
Department of Planning, Transport and Infrastructure  
Email – [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Minister for Planning – As a rate payer in City of Norwood and St Peters and the City of Burnside, I advise that I am opposed to the approval of the proposed Peregrine’s Helipad on the corner of Portrush Road and The Parade Norwood ,it is unsuitable location for many reasons , safety &noise amongst them – we have an airport for a good reason.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]  
**F** [REDACTED]

**Sent:**

[REDACTED]  
Tuesday, 3 March 2020 8:59 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Proposed peregrine helipad

Minister for planning  
Robert Kleeman  
Dept of planning, transport and infrastructure

As a Burnside resident in [REDACTED] Beulah Park I am totally opposed to the proposed helipad by Peregrine corporation.

[REDACTED]



**Sent:**  
**To:**  
**Subject:**

Wednesday, 4 March 2020 7:36 AM  
DPTI:State Commission Assessment Panel  
Fwd: Attention Robert Kleeman re: Peregrine Corporation P/L Helipad

Dear Mr Kleenan

Following on from my first email (below) I want to add my support to the comments of the Norwood Payneham Council as per below.

*Elected members supported a [draft council submission](#) to the state's planning panel, which opposes [Peregrine's plans for a helipad](#) on top of its \$50 million, seven-storey headquarters on the corner of The Parade and Portrush Rd.*

*The submission states a helipad would create "manifestly unacceptable" public safety risks and would be "highly disruptive" for local residents.*

*It is in response to Peregrine's environmental impact report, which has been lodged with the State Commission Assessment Panel.*

*Cr Christel Mex said at a council meeting on Monday night residents were concerned choppers would be used for "joy rides" from Kensington to The Bend Motorsport Park.*

*"It's appalling what's happening," Cr Mex said.*

*This will be a disaster waiting to happen," Cr Dottore said.*

*"This is right in the centre of a medium-density, built-up area. This will change it completely.*

*"It's going to erode the enjoyment of people's lives. It's anti-social to our district."*

*"Ferrying important people to and from a racetrack. It smacks of a display of wealth and privilege."*

*Cr Keste*

*"Whether or not it complies with the law, it defies common sense," Cr Whittington said.*

*"As a parent of children attending any of the eight nearby schools, would you be happy if their play space was used for emergency landings?"*

*"Public safety, which is paramount of course, cannot be guaranteed. Moorhouse said there was "no community benefit in this proposal".*

Peregrine's Environmental Impact Report states: *The helipad would be in accordance with modern hospital helipads currently in use across the country, the report reads.* Comparing what they propose with the use of

helicopters used by hospitals in emergency situations is ludicrous. The use of helicopters by Peregrine is purely for personal financial gain.

The State Commission Assessment Panel has a responsibility to put the safety, wellbeing and health of residents above the need for Peregrine to make a profit. As stated above, it is manifestly unacceptable that Peregrine be allowed to disrupt the lives of so many people and increase the probability of a serious accident in a built-up and very busy area through nothing more than greed - to keep their clients happy!

The Peregrine report is disingenuous to suggest the noise impact will be minimal and is within the required standards. When a helicopter flies nearby now the noise is deafening I can only imagine that being increased exponentially (take-offs and landings, hovering etc) if approved- it would severely impact my family's enjoyment of where we live and impact our health and wellbeing.

I am angry that such a proposal would even be considered. I sincerely hope the panel puts common sense and the health, wellbeing and safety of me and my family and the many residents who will be affected by such a proposal before that of a wealthy corporation with self-interests.

Kind regards

[REDACTED]

----- *Original Message* -----

**From:**

[REDACTED]

|

**To:**

*majordevadmin@sa.gov.au*

**Cc:**

**Sent:**

*Mon, 02 Mar 2020 13:17:02 +1030*

**Subject:**

*Attention Robert Kleeman re: Peregrine Corporation P/L Helipad*

Dear Mr Kleeman

I write in relation to my concerns with Peregrine Corporation Proprietary Limited's proposed helipad. I have read the Public Environment Report and have a number of concerns around OHS issues for residents in close proximity to the proposed site. Frankly the report raises questions rather than allaying the concerns I have. The report does not consider the impact on residents who live within 1km of the proposed site, rather it is trying to legally justify the immoral and detrimental effect such a site would have on people such as myself who live close by. My concerns are:

### 1.

6 of the 7 listed "viable options" (the principal of Loreto has declared publicly that the school would not be used due to safety concerns) during catastrophic engine failure are local school ovals (pages 93,94 and 235). Emergencies are just that, emergencies, and no one can predict when they will occur. The schools suggested are large schools with many buildings and as such classes will be held in different buildings throughout the school day. No one can guarantee the safety of students during an emergency landing should the helicopter fall short of the oval.

Helicopters were involved in around 25% of all general aviation accidents (page 15, Aviation Occurrence Statistics 2008-2017, [www.atsb.gov.au](http://www.atsb.gov.au))

### 2.

3.2 *Peregrine Corporation advised that the highest number of helicopter trips using the helipad in one day is eight trips, and the highest anticipated number of helicopter movements in one hour is three trips.*(page 137)

*The use of the rooftop for helicopter landings is intended for occasional use only. Helicopter activity will operate on no more than ten (10) days per year and only during daylight periods.*(page 226). *Peregrine wishes to conduct ordinary motorised helicopter arrivals or departures from the building on not more than 10 days per year.* (page 2 of the letter from Botten Levinson lawyers to Peregrine)

Up to 8 trips (16 take-offs and landings) per day across 10 days per year (160 take-offs and 160 landings per year). Every take-off and landing creates very loud noise and increases the probability of an accident occurring, a possible crash into local businesses, residential housing, schools and the heavily congested roads:Portrush Road and The Parade. The report again glosses over valid concerns.

### 3.

Sound level

In response from the General Manager Planning and Development Department of Planning Transport and Infrastructure regarding Peregrine's acoustic assessment,

Peregrine responded: *The request is beyond the scope of the Guideline. It introduces requirements which were not part of the Guideline and ignores the acoustic report prepared in response to the Guideline. The request relies on the Environment Protection (Noise) Policy 2007 (the Policy). The Guideline required an assessment against the Policy but aircraft noise is specifically excluded from the Policy and therefore it cannot be used as an assessment tool.*(page 238)

The response from Peregrine staggers me. The sound level is that of a front-end loader over my house between 7am and 10pm. (Safe Work SA.Noise and Hearing loss). From experience, when helicopters fly over or near my house this is correct - the noise is deafening and I certainly cannot bear the thought that this will be a regular occurrence should the helipad be approved.

General Manager Planning and Development Department of Planning Transport and Infrastructure: *Confirmation that the total number of trips (which includes take offs and/or landings for each trip event) that might occur during each day of the 10 days (i.e. how many take off and landings may occur on any given day?) and clarification of the length of start-up and shut down noise timeframe and total number of minutes/hours for the full calendar year. These timeframes should also take account of take-off and landing procedures (i.e. engine warm-up, passenger departure or boarding etc.)* (page 239)

Peregrine responded: *The HAI Fly Neighbourly Guide is not relevant to this assessment and has no legislative standing. Peregrine Corporation cannot commit to how many landings / take-offs may occur on each of those (maximum) 10 days of use per year, there are limited numbers of the type of helicopters referenced for used in the PER. Use of these helicopters is subject to availability and operational procedures of the 3rd party Helicopter Operators.*

Again Peregrine has dismissed the health and wellbeing of residents such as myself.

In conclusion:

Peregrine's Public Environment Report repeatedly demonstrates that the company has little regard for the safety and wellbeing of residents surrounding the proposed site for the helipad.

The report provides data and comments from people who insist the impact of a helipad on residents is negligible and would pose as no threat to their safety, wellbeing and health. The responses are dismissive, arrogant and devoid of empathy. There is no recognition of potential impact on residents.

There is no sound reason for granting Peregrine leave to construct a helipad. *The helicopter landing facility is seen as an integral component of the overall redevelopment of the site and will greatly assist Peregrine in the conduct of its business operations. Helicopters will transport interstate and overseas guests to key Peregrine sites of state importance including the Peregrine headquarters and the Tailem Bend Motorsport Park Complex. The flow on effect of this service is expected to be beneficial to the South Australian economy.* (page 7 of the report)

There is no mention of how residents will benefit from a helipad, rather it's all about Peregrine's clients. The Government needs to consider the people who will be impacted by the helipad. Residents need to be the priority, not a company that wants to increase profits!

There is no justification for putting the health, safety and wellbeing of residents such as myself at risk!

Their Tailem bend facility is 7.7km (8mins) from the Tailem Bend hospital should medical assistance be required. The Peregrine Corporation on Portrush Road is 800m (2mins) from Burnside Memorial Hospital. The only other reason is to increase profits for the company.

If the Peregrine Corporation is granted permission to construct and use a helipad and it impacts my health and wellbeing, or the health and wellbeing of any member of my family I will seek appropriate advice I have no objections to the proposed new build, I think it looks fabulous. However I have very grave concerns about a helipad which will serve no purpose other than to increase a company's profits. It is immoral.

Kind regards

████████████████████  
████████████████████  
████████████████████

---- Message sent via Adam Internet WebMail - <http://www.adam.com.au/>

316 Portrush Rd  
Marryatville 5068  
South Australia

Tel: +61 8 8334 4200  
info@loreto.sa.edu.au  
[www.loreto.sa.edu.au](http://www.loreto.sa.edu.au)

CRICOS No. 00629G  
Loreto Marryatville Limited  
ABN: 19 786 080 843  
ACN: 610 098 069



4 March 2020

Mr Stephan Knoll MP  
Minister for Planning,  
C/ Robert Kleeman, Unit Manager Policy and Strategic Assessment,  
Department of Planning, Transport and Infrastructure,  
GPO Box 1815,  
Adelaide SA 5000

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

**RE: Development Application by Peregrine Corporation to vary approval by adding helicopter landing facilities to the roof of its proposed building at 270 The Parade Norwood ten days per year during daylight hours.**

Dear Mr Knoll,

I am the Principal of Loreto College, Marryatville and write with the authority of the College Board.

I understand the above application to be in the public and agency consultation stage.

My staff have met with representatives of the applicant corporation.

We understand that part of the application includes the use of nearby open spaces in cases of emergency. Our College main oval is suggested in the application as one of a number of such open spaces.

The College comprises a large campus, substantial buildings and up to 550 students from Reception to Year 12 and an additional 140 children from zero to five years of age as well as more than 100 staff. The College owes an unconditional duty of care to each person on campus and in particular, the students and children in our care. Students and staff use all parts of the campus at various times. The main oval (a proposed site for emergency landings) is used extensively for a variety of activities during daylight hours. The College would be most concerned if at any time the health or welfare of its students, staff or visitors to the College was compromised in any way. This proposal has that very serious potential.

For the reasons given in the previous paragraph, the College will not and does not consent to its main oval or indeed any other part of its campus for the stated purpose, that is, the emergency landing of helicopters during daylight hours.

Would you please acknowledge receipt of this letter and confirm that it will be brought to the attention of any decision making authority. The College does not require to be heard in relation to the application.

Yours faithfully



Dr Nicole Archard  
Principal



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

## TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name NICOLE ARCHARD Address LORETO COLLEGE, 316 Portrush Rd  
Telephone ... [REDACTED] ... [REDACTED]

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other School

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

Refer to attached letter





# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Refer to attached letter

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
c/- Robert Kleeman,  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

or via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure

[REDACTED]

[REDACTED]

**Sent:**

[REDACTED]  
Wednesday, 4 March 2020 10:42 AM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Helipad on Peregrine's proposed building

**Attachments:**

Peregrine Objection.docx

Dear Sir,

I have attached my letter to the Premier, Steven Marshall, which explains my objection to putting a helipad on top of Peregrine's proposed building at the corner of Portrush Road and The Parade. Please circulate this to the members of cabinet and especially the minister of planning, Robert Kleeman. My sentiments are shared by the majority of residents in the vicinity of this development as seen in the public forums held at the Norwood Town Hall. If this proposal is allowed to go through it will cause a lot of resentment and annoyance to them.

Yours Sincerely,

[REDACTED]

[REDACTED]

Norwood, SA 5067

20/02/2020

The Hon. Stephen Marshall

Unit 2, 90-94 The Parade

Norwood, SA 5067

Dear Sir,

Re: Proposed variation to building plan by Peregrine Corporation

I am writing to you as you are our local member of parliament concerning an issue that is very worrying to me and just about every one of your constituents in the Norwood, Beulah Park, Kensington, Marryatville and other neighboring suburbs. It relates to the application by Peregrine Corporation to vary their accepted plan to place a helipad on the top of their proposed building at the corner of Portrush Road and The Parade. I live in the recently completed Nuova apartments just across the road from their site and bought my apartment not anticipating this proposal. My objection to this application is based on the following:

- 1—It will create a significant increase in noise levels
- 2—Increased risk of accidents in a built-up area with many schools,
- 3—a sneaky structure resembling a second helipad in on the plans and styled emergency landing
- 4—The proposal is for use 10 days per year during daylight hours. Daylight hours varies during the year and can be 5.00 am or 9.00 pm sometimes. No one knows who will monitor such activities
- 5—The idea that the use of helicopters 10 days a year will significantly enhance their businesses does not ring true. What happens during the other 355 days of the year? There is a suspicion that the use relates more to transport to and from their race track at Tailem Bend.
- 6—The helicopters should use the airport facilities which is meant for the purpose and safer with proper controls and less disruptive.
- 7—It sets a precedence for other similar applications/ventures
- 8—It will cause a fall in property values in the neighborhood. Who will compensate us for that?
- 9—The arguments by the experts who were present at the community meeting at the Norwood community hall were supportive of the proposal, but they were either salaried staff or paid consultants of Peregrine.
- 10—The local electorate is very passionate about their objection to this proposal as seen at the meeting at Norwood community hall and will take a dim view of any Government or Government Department that support it.

I ask that you personally intervene and address our concerns.

Thank You,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**Sent:**

[REDACTED]  
Wednesday, 4 March 2020 11:06 AM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Peregrine Helipad Objection

Attn: Minister for Planning

Dear Robert Kleeman

**I live in the historically significant area of Kensington in a heritage listed home. I vehemently object to Peregrine's application for a helipad on top of his office building.**

Helicopters are involved in a high percentage of aviation accidents and to have one come down on a major arterial road such as Portrush Road would cause countless fatalities. But even worse, what if they choose to come down on one of our school ovals?

This represents not only a danger to the public but significant noise pollution in a beautiful quiet area. Why would the state government even entertain this ridiculous application? Is it because Peregrine's owner has some significant advantage above the normal population?

Please reject this proposal.

Sincerely

[REDACTED]  
[REDACTED]

[REDACTED]

**Sent:** Wednesday, 4 March 2020 11:43 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** OBJECTION: Peregrine Helicopter Landing Facility - 270 the parade

Hi,

**Please include in the consultation process / record my objection to the proposed application by Peregrine for a Helicopter Landing Facility at 270 the parade.**

In note in the Public Environmental report:

- The helicopter landing facility is seen as an integral component of the overall redevelopment of the site and will greatly assist Peregrine in the conduct of its business operations. The need for quick, accessible transport is paramount to ensuring a pleasurable experience for overseas and interstate business guests. Helicopters will transport interstate and overseas guests to key Peregrine sites of state importance including the Peregrine headquarters and the Tailem Bend Motorsport Park Complex. The flow on effect of this service is expected to be beneficial to the South Australian economy.

Comment: This comment does not seem reasonable or correct as being a integral component of the overall redevelopment of the site (are they planning not to build the complex if the helipad is not approved??). Integral component for only 10 days?? Sites of state importance???

“The flow on effect of this service is expected to be beneficial to the South Australian economy” – this will occur if helicopter movement occurs from the Adelaide OR Parafield airport.

- A second concrete helipad will be constructed to be available as an informal/temporary landing site for helicopters in the event of an emergency only.

Comment: does not seem necessary - what conditions will be imposed to ensure both helipads are not used at the same time / when other main pad operative??

- No helicopters or fuel will be stored on site nor will any on-site servicing occur. The helicopters will be ordered from the airport on an as needs basis.

Comment: Helicopters should stay at the airport and no reason why passengers cannot move to their racing facility from the airport.

### **Other**

Comment: Given the proximity of the subject site to residential development, educational, communal and public facilities, businesses and major arterial roads, the operation of the Helicopter Landing Facility should not be allowed due to noise & safety issues.

“Design Quality Guideline 3: The proposal will be a high quality landmark design for the site, the local area and the wider metropolitan area.” – how can they say a helipad is a high quality landmark – might as well say a telephone tower is a high quality landmark!!

Heritage Context Guideline 4: Helipad should not be next to heritage areas or any housing area (this is why we have 2 airports)



[REDACTED]

---

**Sent:**

[REDACTED]  
Wednesday, 4 March 2020 12:13 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Attention: Robert Kleeman - Peregrine Head Office Development

Attention Robert Kleeman - Unit Manager Policy and Strategic Assessment Planning & Land Use Services, Department of Planning, Transport and Infrastructure.

Im writing today in re of Peregrine Head Office Development 270 The parade, Kensington;

I am for the major development application, I believe it is a great development opportunity for SA, not only is it an attraction point for South Australians, I believe it is a unique and fantastic approach to Community and local areas.

Giving the approval will encourage more jobs in the locality. I believe Peregrine has produced copious amount of jobs over the past decade for South Australians and to have this Helicopter Pad on his private Head Office should be considered. In the report, it is proven to have no effect on the characteristics of the locality, noise isn't an issue and it's designed to be sufficiently safe.

Further more, thinking in a humane and logical manner, Executive Chairman of Peregrine will have no support in this development what so ever, with negative remarks and written submissions from the public. I support the local businessman and his exciting ventures/attractions and developments he's providing to South Australians.

**Warm Regards,**  
[REDACTED]  
[REDACTED]



## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

#### What is your interest in this proposed development?

- Neighbour  
 Local resident  
 Business operator  
 Community group  
 Landowner  
 Other .....

#### What is your overall position on the proposed development?

- I support the development  
 I support the development with some concerns  
 Neutral  
 I oppose the development

#### Do you have concerns regarding the proposed development?

- 1) Safety issues - Landing a Helicopter in a built up residential area.
- 2) Noise factor, - the noise created by the landing.
- 3) Location: - Normally a helicopter landing is in an area clear of all restrictions eg. power lines, movement of people, motor vehicles. This is not the case with this facility as it is surrounded by a residential area. eg. Schools, shopping areas in close proximity.





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Not to allow this facility to go ahead.

Other general comments:

This facility - Helicopter Landing at The New RAH, is needed for the requirements (Health) of the people of this state. But to have this facility in a residential area, + for what purpose? To me it doesn't stand up to the pub test.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
c/- Robert Kleeman,  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

or via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure



## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

#### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

#### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

#### Do you have concerns regarding the proposed development?

Safety for residents, students and traffic  
Noise level unacceptable for anyone within hearing  
vicinity of helipad.  
No place for helicopters (except major hospital delivering  
patients) - Airport only acceptable location.





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

### What could be done to address your concerns?

Do not allow this Development Proposal to go ahead.

Give priority to residents, schools and businesses to live, learn and develop in a helicopter noise free area.

### Other general comments:

7 stories - too high for the proposed building.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
c/- Robert Kleeman,  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

or via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure

[REDACTED]

**Sent:**

Wednesday, 4 March 2020 1:15 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Peregrine proposed helipad

Good afternoon

I hope that common sense prevails within your department and the Burnside Council to reject this nonsense application by Peregrine.

Mr Shanin apparently would like to impress his guests by being able to ferry them around Adelaide on a helicopter, and then land in the middle of Norwood on his new, huge, multi-storey building. Never mind the noise and the associated risk to the nearby residents if an accident occurred.

This application is all about pandering to Mr Shanin's overblown ego - nothing more.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Sent from my iPhone



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

*Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.*

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

SEE ATTACHED LETTER





# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

DON'T BUILD IT

DO NOT  
PERMIT  
SUCH  
A FACILITY

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
c/- Robert Kleeman,  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

or via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure

Minister for Planning

c/o Robert Kleeman

Department of Planning, Transport and Infrastructure,

GPO Box 1815

Adelaide SA 5000

Dear Mr Kleeman

I have perused the written application for a Helicopter Landing Facility and attended a public meeting re the issue on the 18<sup>th</sup> of February 2020. This process has not persuaded me to support the building of such a facility. My reasons for this are as follows;

Peregrine, a private company wish to build what is in fact a commercial scale Helicopter Landing Facility for the benefit of their business, in a primarily residential area which happens to be an historic one. I do not see any benefit to local residents from such a structure. I do not believe such a private use facility should be built in any residential area in Adelaide, given safety issues and the noise impact.

Urban environments are noisy. Exceptional noise from emergency situations requiring warning sirens and some helicopter usage if required is something residents tolerate as they associate such activity with assistance being rendered to people in urgent need, despite it being somewhat intrusive. I believe these are the only valid reasons for helicopters flying in residential areas and using rooftop landing facilities.

I think approving such a facility sets a dangerous precedent and do not wish to see it built.

Yours sincerely



cc

Mayor Robert Bria, Norwood Council

Steven Marshall ( Member for Dunstan)

James Stevens (Member for Sturt )

29<sup>th</sup> February 2020

[REDACTED]

---

**Sent:**

[REDACTED]  
Wednesday, 4 March 2020 2:55 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Peregrine's Helipad

I wish to register my strong objection to the proposed Peregrine Helipad.

Norwood/Kensington are beautiful historic areas which can only be devalued by such a development. There are residences, schools, nursing home and churches in the general area which would be subject to noise and pollution; and as for the suggestion that school ovals would be used in the case of catastrophic engine failure - how dangerous and destructive is that!

NO! no helipad in Norwood/Kensington.

Regards

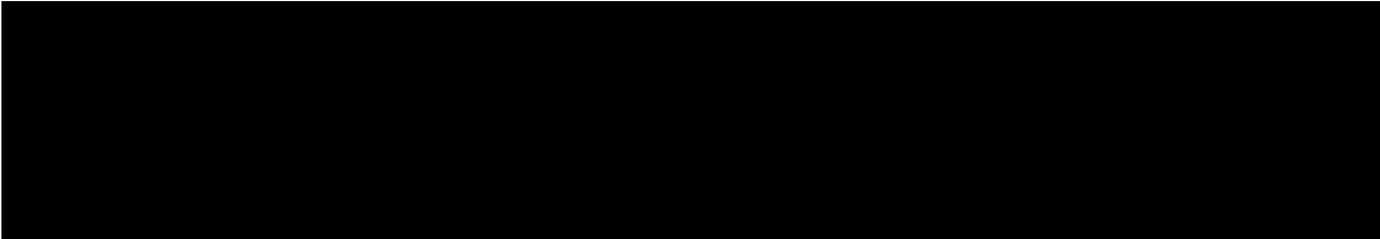
[REDACTED]  
[REDACTED]

Peregrine-PER-for-Variation-2-Submission-Proforma

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.



What is your interest in this proposed development?

- . Neighbour
- . Local resident
- . Business operator
- . Community group
- . Landowner
- . Other

.....  
.....

What is your overall position on the proposed development?

- . I support the development
- . I support the development with some concerns

## Peregrine-PER-for-Variation-2-Submission-Proforma

. Neutral

. I oppose the development X

Do you have concerns regarding the proposed development?

Yes!

1) it is divisive as a community installation ... it separates a single corporation from the society which supports it.

The corporation is resorting to economic bullying at a political level - and indulging in a pandering-to-the-few at a societal level.

2) it is creating a precedent whereby any subsequent constructions can compromise a community by offering a "variation" to an already sanctioned development.

3) it is unsafe on a number of levels not least immediate neighbours'/residents' safety, adjacent school students' safety, vehicular safety on busy through roads, swim pool users etc etc

4) there is NO consideration regarding flight paths, rotor wash, wind shear due to existing buildings and traffic, landings/take-offs being traffic hazards.

5) there is NO consideration as to noise ... invasive sounds during approach, hover, landing, take off, auto-rotation and departure stages.

6) there are precedents world-wide where cities have NOT permitted urban residences the opportunity to build helipads/heliports on roofs.

7) pilot error is seemingly a very significant safety concern for helicopters and whilst I do NOT SUPPORT more regular usage, a helipad (used on supposedly merely a few occasions) in a closed environment with a traffic corridor heavily used by haulage vehicles is simply not the appropriate site given such complexities.

8) have Peregrine Corp seriously considered the emotional consequences and economic backlash were a helicopter to emergency land in a local schoolyard ... or the swim pool ... or crash into the service station nearby on The Parade ... or damage the church across the road ... etc etc????

9) what is wrong with showing off to potential clients the sights of Adelaide in the 30 min trip by car from Adelaide airport to Corporation HQ ... or the reverse if flying to The Bend?

10) last year in the U.S. more than 55 lives were lost in helicopter incidents. Apart from the high profile Koby Bryant crash which killed 9 passengers earlier in 2020, what will it take to reconsider the ego-centric urge to build a chopper pad atop a 7 storey building?

The risk and divisiveness is simply not worth it!

What could be changed

Nothing! Simply discard the notion completely!

The concept of a smaller building in the midst of a residential area is frightening in its arrogance and contemptuous of safety risks.

Other Comments

Peregrine-PER-for-Variation-2-Submission-Proforma

community consultation is NOT a matter of "announce 'n' defend" ... the session I attended at the Norwood Town Hall was a sham PR exercise for Peregrine and not an opportunity for residents to voice their concerns, misgivings, an opportunity for misunderstandings to be clarified...

... the set up was good, the notion of having a sheet of paper on group tables for writing questions on was sound .... however, peregrine personnel seemed merely to present information rather than clarify or correct the audience's confusion. What followed was annoyance and a discourtesy to residents and those attending!

What could be done to address your concerns?

Other general comments:

[REDACTED]

---

**Sent:**

[REDACTED]  
Wednesday, 4 March 2020 4:15 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Peregrine's Helipad

To the Minister for Planning

Dear Minister

I strongly urge you to oppose this helipad for numerous health and safety concerns.

This development is sited at a major intersection that is used consistently throughout the day. Extremely close by is the steeple of Clayton Memorial Church.

Helicopters are susceptible to strong winds and this weather is quite frequent in the area.

Norwood Parade is a busy commercial precinct and there is a school close by.

Besides the risk of engine failure and pilot error, the noise factor is considerable. I've worked in hospitals here and in the UK and speak from firsthand experience.

Please use your influence to overturn this plan. There is no need for this to happen.

Yours sincerely



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.



What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

This building should never have been approved in its <sup>current</sup> form..  
The proposed helipad was never integral to the development as claimed by the developer and is totally inappropriate

1. Increased noise pollution
2. Potential damage from wash to persons and property.
3. Danger of coashing.
4. Devaluation of surrounding property
5. No control of flight numbers and frequency
6. Flight numbers days could be increased in the future
7. Flight hours unacceptable
8. Sets dangerous precedent
9. Totally unsuitable as an emergency landing site.





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

*Reject the proposed helipad*

Other general comments:

*This indulgent proposal has no basis other than self gratification. It is grossly antisocial showing a total disregard for the residents*

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
c/- Robert Kleeman,  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

or via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other

Resident of Burnside & extended family.

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

Yes - Big Concerns.

Allowing this to proceed WILL set a precedent.

We do NOT want this to happen.





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Dis-allow this

Other general comments:

We do NOT want  
helicopters buzzing around  
high density but most important  
Schools

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
c/- Robert Kleeman,  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

or via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure

From:

To:

The Minister for Planning  
c/ Robert Kleeman  
Dept of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

03-03-2020

Dear Sir,

As a resident of Norwood for over twenty years, I write to express my serious concern and opposition to the proposed Helipad development by the Peregrine Corporation. In spite of all the assurances by the company of its limited use over the course of a year, I have serious doubts as to the company's 'bona fides' in this matter and in the use of the Helipad over the long term.

This proposal appears to be that of a large company attempting to create a precedent for this type of development on top of a proposed building – which is too high for its location close to schools, heritage buildings, a residential area as well as a major road junction.

The company's listed "viable options" for safe landing on school ovals in the event of engine failure, is another expression of a large company wanting its own way no matter what the cost might be to the wider community close to a residential area.

Why can the Peregrine Corporation not locate its helicopter at the airport as any other body would? That is what the airport is for! The Peregrine Corporation's helicopter can hardly be placed in the same category as those of the police or ambulance!

Yours truly,

Copy to Hon. Stephen Marshall Premier and Member for Dunstan.

[REDACTED])

---

**From:** [REDACTED]  
**Sent:** Wednesday, 4 March 2020 9:45 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Stop Peregrine's Helipad

No to the helipad.

[REDACTED]  
[REDACTED], Kensington 5068

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, 5 March 2020 10:47 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Variation 2 Helicopter Landing Facility

As a local resident of Norwood I am strongly opposed to the helicopter landing facility proposed for the Peregrine building.

The excessive noise which will be created by the helicopter take-offs and landings several times each day across the 10 days currently proposed, with a 10 pm cut off time, will be very intrusive and disruptive; intolerable. Once in place this usage will increase past the 10 days.

The safety aspect is something which must be considered; the risk of a catastrophic accident is real.

The value of our properties will be severely impacted as will the amenity and just plain joy of living in Norwood. Norwood is a wonderful iconic area which will be destroyed if this project variation is approved.

We have a very efficient, functional airport close to the city, why can't that be used for these helicopters?

I hope that the concerns and objections of residents and businesses of Norwood and surrounding areas are taken into account and heeded and not ignored or considered trivial.

[REDACTED]  
[REDACTED]  
Norwood 5067

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Proposed development of the Peregrine site Portrush Road  
**Date:** Thursday, 5 March 2020 11:14:10 AM  
**Attachments:** [Peregrine.docx](#)

---

The Minister for Planning  
[REDACTED]  
Department of Planning, Transport and Infrastructure

Dear Sir,

We are writing to you in opposition to the proposal to include a helipad on the top of the Peregrine development on cnr. Port rush Road and The Parade, Norwood.

My wife and I recently moved back to South Australia after some 10 years in Victoria. We purchased a house in Beulah Park only 3 streets from the abovementioned development.

On 25 March last year we wrote to [REDACTED], our local member, strongly opposing this development and in particular the proposed helipad. We have attached a copy of that letter to this e-mail.

We believe our arguments against the development are still relevant and would ask you to consider them.

New information which has come to our notice is that there would be the potential for up to 16 take-offs and landings per day - during the 10 days in which use is to be permitted and that there is a very disproportionate number of helicopter accidents in comparison to overall air accidents.

Whilst we remain highly critical to the overall development in its proposed form - particularly in terms of its character compared with the heritage nature of surrounding buildings, it is our understanding that the Government has approved the development proposal and the only further approval outstanding is for the helipad. Please, we would ask you to carefully consider the ramifications outlined in our previous letter particularly as regards the minimal benefits of the proposal in comparison to the significant disadvantages including increased noise and safety.

Yours faithfully  
[REDACTED]

[REDACTED]  
Toorak Gardens 5065

c.c. The State Planning Minister

[REDACTED],  
Re: Proposed redevelopment of the Peregrine Corporation site, cnr. Portrush Rd. and The Parade, Norwood.

We are writing to express our concern regarding the proposed redevelopment referred to above.

As we understand it, the proposal in its current form involves replacing the existing building on this site with a larger, seven story building, which would include a helipad on the roof. We strongly object to this proposal for the following reasons:

This is already a difficult and congested intersection, coping as it does with a very high traffic volume coming from all directions and including a high and seemingly ever increasing number of heavy vehicles, Portrush Rd. being the main truck route between Adelaide's industrial north and Victoria.

Since moving back to S.A. after a 10 year absence, we have been dismayed to learn that nothing has apparently been done yet to alleviate this volume of unsafe heavy transport by creating another link to the Western Highway and Victoria, and removing heavy vehicles from Portrush Rd. which travels through some of Adelaide's best suburbs and passes a number of major private and public schools.

So, even though this major problem continues, we are now looking at further congesting this intersection with a major multi story building. We shudder to think of what would happen during the construction process!

The proposed helipad would need to be located only a few hundred metres from Mary McKillop College and not all that far from a number of other schools including Pembroke, Marryatville and Linden Park.

The proposed building would be completely out of character with the historical buildings on each of the 3 other corners of this intersection and would completely dominate the architecture which exists on these other three corners. Also, we understand that the Clayton Wesley Uniting Church is planning a multi million dollar restoration to its heritage listed building and is objecting to the Peregrine Development.

There are significant safety aspects in connection with the proposed helipad:- From whichever direction helicopters were to come, they would need to fly over highly populated residential and educational areas which already are in the flightpath of commercial jets to/from Adelaide Airport. We see no safe corridor for helicopters here!

We understand that one of the main uses of the proposed helipad would be to service the developer's significant motor racing investments at Tailem Bend. If the helicopters to be serviced/used were restricted to the existing airport, this would involve very little extra flying time than would be the case if the proposed helipad were approved.

We consider that helicopters landing/taking off from the subject intersection would impose a further volume of noise (there already being significant traffic and in particular heavy transport noise) and danger, particularly having regard to the existence of substantial historical buildings on this intersection which include the Wesley Church Spire and the Bell Tower of the Russian Community Centre opposite. Helicopters would have to safely negotiate these structures and other tall structures in the near vicinity.

In addition, of course, we are concerned that if the proposal was to go ahead in its present form there would be a significant negative impact on local property value.

To summarise, we strongly object to this proposal. Surely a more modest quality development more in sympathy with the adjacent properties and without the proposed helipad would be more appropriate.

We would appreciate your confirmation of having received this letter and would further appreciate you keeping us informed as to progress of this development application and any changes to it.

Yours sincerely,

[REDACTED], Beulah Park 5067

[REDACTED]

25 March 2019

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** stop peregrines heli pad  
**Date:** Thursday, 5 March 2020 12:21:01 PM  
**Attachments:** [Outlook-1453263938.png](#)

---

Please stop the heli pad from going ahead



**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Representation regarding the Peregrine Mixed Use Major Development Variation 2 - Public Environmental Report  
**Date:** Thursday, 5 March 2020 8:28:55 PM

---

To the State Commission Assessment Panel members,

I wish to object to the proposed Helicopter Landing Facility as part of the Peregrine Corporation's Headquarters upgrade, the Public Environment Report for which is current out for public viewing.

This site is a totally inappropriate location for a helicopter landing facility, being within close proximity of residences and busy roads. Even for a small number of days a year (and what is to say flights would be limited to only 10 days per year once constructed?), the noise and disruption for local residents, like myself and my young family, would be unacceptable.

The use of local school ovals for emergency landing locations is also inappropriate and unsafe.

I urge each Panel member to ask themselves how they would like to have a helicopter landing facility at the end of their street in considering this application.

Yours sincerely,

[REDACTED]

Beulah Park 5067

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Representation regarding the Peregrine Mixed Use Major Development Variation 2 - Public Environmental Report  
**Date:** Thursday, 5 March 2020 10:06:46 PM

---

To the State Commission Assessment Panel members,

I wish to strongly object to the proposed Helicopter Landing Facility as part of the Peregrine Corporation's Headquarters upgrade, the Public Environment Report for which is current out for public viewing.

This site is a totally inappropriate location for a helicopter landing facility, being within close proximity of residences and busy roads. Even for a small number of days a year (and what is to say flights would be limited to only 10 days per year once constructed?), the noise and disruption for local residents, like myself and my young family, would be unacceptable.

The use of local school ovals for emergency landing locations is also inappropriate and unsafe.

I urge each Panel member to ask themselves how they would like to have a helicopter landing facility at the end of their street in considering this application.

Yours sincerely,

[REDACTED]

Beulah Park  
5067

RECEIVED

06 MAR 2020

Toorak Gdns 5065

2 March 2020

The Minister for Planning  
[REDACTED]

Dept. of Planning, Transport + Infrastructure  
GPO Box 1815,  
Adelaide. SA. 5000.

Dear Minister  
re Peregrine Proposal for Helipad.

I am a member of a household of persons affected by this proposal. Please note our opposition. Family members either attend, attended or are enrolled at schools local to this proposal.

Local schools would be impacted catastrophically by the noise and disruption in their environment, if the proposal for upto 16 take-offs and landings per day across 10 days, went ahead.

The sound level equates to <sup>that of</sup> a front-end loader, and the vibrations are unsettling, to people, businesses, motor vehicles on local roads, and animals - especially dogs.

Date:

From:

2.

Educational institutions unnecessarily impacted by helicopters in the proposed locality include Pembroke school, St Joseph's School, Mary Mc Killop College, St. Ignatius College, Marryatville Primary School, Marryatville High School, Norwood Primary school, Loreto College, Norwood High School.

Six of the 7 listed viable options during catastrophic engine failure, according to the Public Environment Report pp 93, 94, 235, are on school ovals.

We ask you to never put children - or your constituents - at danger ... hence never to consent to the Proposal.

There is an Airport <sup>(Adelaide Airport)</sup> nearby, and another less than an hour's commute, in Adelaide. Everyone else accepts these airports and their safety facilities. Public safety is of utmost importance. We are opposed to helicopters being granted permission to land; we oppose the helipad, and we urge you to consider our opposition to the proposed development.

Local Aged Care Facilities and Hospitals would be impacted negatively if the proposal were approved. Approval would be the thin edge of a wedge.

Yours sincerely,

Date: \_\_\_\_\_

4<sup>th</sup> March, 2020

RECEIVED

06 MAR 2020

██████████  
BEULAH PARK SA 5067

██████████  
Minister for Planning

██████████  
Department of Planning, Transport and Infrastructure  
GPO BOX 1815  
ADELAIDE SA 5000

██████████  
Re: Proposed Peregrine Helipad, Portrush Road, Norwood

We are writing to you with regard to the application to build a Heliport in the midst of a residential area.

We object strongly to this application. We all understand the obvious facts:

1. The use of public local school ovals for catastrophic engine failures and the encumbent risk to life and property.
2. The intensity of proposed "trips" from 7am to 10pm and the consequent noise and disruption to private families and the community.
3. The intensity of noise generated by these trips and disruption to the private homes and public/private schools in the immediate and further area.
4. The fact of the greater proven danger of helicopter accidents.
5. That it could very well set a precedent for others to have the same permission granted and thus cause further degradation of community.

As well, my husband and other Vietman Veterans suffer ongoing PTSD at the sound of overhead helicopter engine noise and I can vouch for the seriousness of this.

I have heard that one of the reasons for proposing this Helipad by the owners, is that they can transport their guests from one of their entertaining sites to another. Is this really a good reason? We all know that SA Roads are easy, accessible and reliable for the remainder of the population and taking on the kind of risks outlined above would seem very short sighted and dangerous. It also relies heavily and dangerously, on the community who gain nothing positive out of granting this helipad, rather they lose amenity and peace in the homes and at work and play at school.

We look forward to hearing from you.

Yours faithfully,

██████████  
██████████

Minister for Planning

RECEIVED

06 MAR 2020

[REDACTED]  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

Dear Sir

I wish to record my opposition to the proposed Peregrine building project. I believe it will adversely impact many residents, businesses and organisations in the immediate vicinity. The increase in noise, traffic and parking problems will potentially impact on the village feel of The Parade, and likely drive away those who live outside Norwood who visit for shopping and dining.

The intersection of Portrush Road and The Parade already experiences a very heavy traffic load, and I am concerned this will only increase with the Peregrine redevelopment.

As a retired teacher, the thought of school ovals being used as helicopter landing pads in the event of an emergency is very concerning. There are a number of schools within a one-kilometre radius of the proposed building project, namely, Pembroke Campuses, Marryatville High, Marryatville Primary, Loreto College, Mary Mackillop College, St Ignatius, Norwood Primary, and two St Joseph campuses.

It also concerns me that the noise of helicopters overhead will mean a distraction for children trying to concentrate in lessons, and staff trying to do their job of teaching. My daughter lives very close to the Royal Adelaide Hospital, and the noise created by the medical evacuation helicopters is significant. Helicopter use for medical emergencies is entirely understandable, but transporting tourists to and from motor racing is not a necessity. The Adelaide Airport is just 25 minutes drive away, and can easily be accessed by Peregrine to transport their clients.

I am also concerned about the built-up nature of my local area and cannot imagine how devastating a helicopter accident would be on this primarily residential suburb. The Australian Transport Safety Bureau notes that private helicopters have the highest fatal accident rate for any aircraft or operation type.

For all the reasons I have described, and in the interest of life in general for all those in the vicinity, let there be no development as proposed on the Peregrine site.

Yours sincerely

[REDACTED]  
[REDACTED]  
Norwood SA 5067

4 March 2020

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Cc:** [REDACTED]  
**Subject:** peregrine heliport  
**Date:** Friday, 6 March 2020 1:05:33 AM  
**Importance:** High

---

[REDACTED]

As a resident living approximately 2minutes or 1.3km east of the Portrush/Parade intersection, I wish to register my opposition in the strongest terms to the Peregrine Corporation inclusion of a Heliport as part of their development.

Apart from the potential safety issues associated with the number of flights at various times particularly given the number of schools etc in the area, the noise will be completely unacceptable.

If this group require helicopter transport let them travel from a recognised point e.g. Adelaide airport, rather than negatively affecting the surrounding residential areas.

The mood of those in my neighbourhood and others I have chanced to speak to in the surrounding areas is that given the above the idea is completely without merit.

Yours faithfully,

[REDACTED]  
[REDACTED], Kensington Park SA 5068

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** SA Governments increased liability and risk should it approve Peregrine Helipad  
**Date:** Friday, 6 March 2020 7:44:19 AM

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To SA Development Authority

I am writing this email to express my concern and deep fear at the proposed plans for a Helipad at Peregrine's new facility. I have four children that are attending schools in some of the proposed landing zones.

One of the key concerns that I have with this proposal are the plans to divert any Helicopter in distress to a public school oval. Why these emergency sites are even being considered as a viable plan is deeply concerning?

On so many levels the decision to potentially provide approval puts at unnecessary risk children across the eastern school zone. Noting the greater % of Helicopter crashes (25%) despite only 14% of the volume of aircraft the evidence indicates a greater risk of a crash occurring than for standard aircraft.

In making this decision what liability is the South Australian Government absorbing on behalf of a private sector company?

In the interests of public safety especially our children's this proposal should be rejected outright without review.

Best regards

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** BAN THE CHOPPER  
**Date:** Friday, 6 March 2020 9:41:20 AM

---

## To Whom It May Concern.

We live in the immediate area of the planned building by Peregrine and do not want the helipad anywhere near us because the noise and the fact that they have been known to fall out of the sky. We live in [REDACTED]. I will join any action to stop it such as marching, placards and the like.

My name is [REDACTED] and if you need my mobile number it is [REDACTED]. My partner's name is [REDACTED] and she agrees with the content of this email.

Sorry I can't sign this.

Sincerely.

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** RE Peregrine HQ development  
**Date:** Friday, 6 March 2020 2:38:32 PM

---

As a nearby resident to the proposed new head quarters of the Peregrine Corporation at the corner of The Parade and Portrush Rd, I would like to voice my concern to the proposed helipad they wish to construct.

My house - [REDACTED] will sit directly under the flightpath of helicopters arriving and departing, and unlike buying nearby to an established airport, this flightpath did not exist at the time I purchased my house. I have considerable concern that even flying within the restricted flight times proposed by Perigrine, the noise will be disruptive to all of the residents in close proximity.

I am even more concerned that future governing bodies may be tempted to grant exemptions to the self imposed restrictions, or lift them all together - Perigrine seem to have quite the track record in eventually succeeding in getting what they want, even if they edge inch by inch towards their goal initially.

Additionally, I have safety concerns about regular helicopter movements within such a densely populated area. An emergency could see a helicopter trying to set down in an open field such as the oval next to Pembroke and put children, pets and innocent people at significant risk given the high utilisation of nearby ovals by the community. Equally, given the small proposed landing space could mean that a minor mishap on takeoff or landing could have a helicopter crashing directly into medium or high density dwelling in the areas immediately around the landing zone.

I find it very difficult to believe that a functioning helipad would improve the contribution to the South Australian Economy by Peregrine corp given how easily accessible the current alternative options are from the location of the headquarters (i.e. the Adelaide Airport), and any minor improvement they may experience would be heavily outweighed by the cost to the community through increased noise and safety dangers. Adelaide is a small city, and while I support helicopter movements where it is of benefit to the community such as for medivac and fire fighting requirements, the cost to the community for using helicopters as a convenient transport alternative is simply far greater than the benefits which would be realised by the select few using them.

Regards,

[REDACTED]

[REDACTED],

Beulah Park

[REDACTED]

1  
Dear Mr Kleeman

4 Mar 20

RECEIVED

10 MAR 2020

Re: Peregrine's helipad

I am living in a house near the proposed helipad site. I hope you are not going to approve the helipad mentioned in the newspaper article & flier inclosed herewith.

Helicopters which would fly in/out from the proposed site are not only noise distraction for us. It would be a big annoyance for <sup>all</sup> the residents including a nursing home nearby.

& distraction for ~~many~~<sup>many</sup> students studying in three schools (very close!!) & more schools around.

Sorry for being anonymous

Thank you

# STOP PEREGRINE'S HELIPAD



WE HAVE AN AIRPORT FOR GOOD REASON.

## FACTS ABOUT THE PROPOSED HELIPAD:

- 6 of the 7 listed "viable options" during catastrophic engine failure are local school ovals<sup>1</sup>
- Up to 8 trips (or 16 take-offs and landings) per day across 10 days<sup>2</sup>
- Sound level of a front-end loader over your house between 7am and 10pm<sup>3</sup>
- Helicopters were involved in around 25% of all general aviation accidents even though they only account for 14% of the Australian VH-registered fleet<sup>4</sup>

## DO YOU WANT THIS DANGER IN YOUR SUBURB?

Have your say and write to:

Minister for Planning

c/- Robert Kleeman

Department of Planning, Transport and Infrastructure  
GPO Box 1815, Adelaide SA 5000

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

**NO LATER THAN MARCH 13 2020.**

*"Development applications on public notice must allow for affected persons to have their say during the public notice period. The support of or opposition to a development by affected people is an important consideration in the decision-making process of a development."*

<http://www.saplanningportal.sa.gov.au>

The Public Environment Report is available at:

[www.saplanningportal.sa.gov.au/public\\_notices](http://www.saplanningportal.sa.gov.au/public_notices) (Under Major Developments)

<sup>1</sup> Pages 93, 94 and 235 of the Public Environment Report  
<sup>2</sup> Page 137 of the Public Environment Report

TUESDAY MARCH 3 2020 ADVERTISER.COM.AU



VISION: An artist's impression of the proposed Peregrine Corporation head office.

## Helipad highly disruptive: Council

**BEN CAMERON**

A HELIPAD on top of Peregrine Corporation's headquarters in Kensington would create "manifestly unacceptable" public safety risks and be "highly disruptive" to residents, a Norwood, Payneham & St Peters Council report says.

The council's draft submission in response to OTR owner Peregrine's environmental impact report – lodged with the State Commission Assessment Panel – to the proposed

helipad recommends elected members oppose the plan.

It says the public safety risks created by putting a helipad on top of Peregrine's new \$50-million, seven-storey headquarters on the corner of The Parade and Portrush Rd would be "manifestly unacceptable".

It also says noise from choppers would be "highly disruptive" to residents.

"The council considers that the proposed helicopter landing facility would have a significant adverse impact on the

amenity for residents living in the surrounding residential area, through noise from helicopters using the landing facility," the submission reads.

A Peregrine Corporation spokeswoman said the company had not been provided with a copy of the council's draft submission. "We will address all relevant issues in accordance with the public consultation process," she said.

Councillors were due to vote on the draft submission at a meeting last night.

Minister for Planning

RECEIVED

10 MAR 2020

Dept of Planning, Transport & Infrastructure  
GPO Box 1815  
Adelaide 5000

Heathpool,  
South Australia 5068

3/3/20.

Dear Sirs,

I am writing to strongly object to the Peregrine Company's right to use a helicopter at their offices on The Parade Norwood.

It is inappropriate for a residential and shopping and office environment to allow helicopter landing. It is dangerous, noisy and completely unnecessary. There is an airport suitable for helicopter landing only 30 to 40 minutes away. There is no need for another landing site in another suburb.

I know how noisy & distracting the helicopter landing at the Old Royal Adelaide Hospital was and can certainly see no need for such a thing for no real reason in a residential suburb.

Please oppose this application.

Yours sincerely

RECEIVED

10 MAR 2020

[REDACTED]  
Kensington Gardens  
SA 5068

Minister for Planning

I feel very strongly about Helipad as most residents in eastern suburbs do.

1. Not good for environment.
2. Clayton church will eventually be effected by this. As it is an old church pieces will begin to crumble onto roads adjoining it.
3. New residential complexes have been completed + will be effected.
4. As it is a busy intersection so will everything around it.
5. And of course safety is a big issue.
6. Airport in 40 mins away which is not a long time to travel. Any international guests will be at airport anyway.
7. The Shakers have done a lot for the community but I ~~don't~~ feel helicopters flying around is not good.
8. I hope this is stopped.

Many thanks.

[REDACTED]

# STOP PEREGRINE'S HELIPAD



## WE HAVE AN AIRPORT FOR GOOD REASON.

### FACTS ABOUT THE PROPOSED HELIPAD:

- 6 of the 7 listed "viable options" during catastrophic engine failure are local school ovals<sup>1</sup>
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**Minister for Planning**

**c/- Robert Kleeman**

**Department of Planning, Transport and Infrastructure**

**GPO Box 1815, Adelaide SA 5000**

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

**NO LATER THAN MARCH 13 2020.**

*"Development applications on public notice must allow for affected persons to have their say during the public notice period. **The support of or opposition to a development by affected people is an important consideration in the decision-making process of a development.**"*

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<sup>1</sup> Pages 93, 94 and 235 of the Public Environment Report

<sup>2</sup> Page 137 of the Public Environment Report

<sup>3</sup> <https://www.safework.sa.gov.au/sites/default/files/5.4.12-noiseandhearinglosscop.pdf?v=1529291239>

<sup>4</sup> p.15, Aviation Occurrence Statistics 2008-2017, [https://www.atstb.gov.au/media/5776642/ar-2018-030\\_final.pdf](https://www.atstb.gov.au/media/5776642/ar-2018-030_final.pdf)

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Stop Peregrine"s Helipad  
**Date:** Friday, 6 March 2020 2:55:09 PM  
**Attachments:** [image746000.jpg](#)  
[image920001.png](#)  
[image777002.jpg](#)  
[image877003.png](#)  
[image705004.png](#)  
[image603005.jpg](#)

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Dear Minister for Planning,

[REDACTED] I am emailing you to implore you to do everything in your power to ensure  
The proposed helipad at Peregrine does not get approval please.

My family and I live on [REDACTED] Norwood, the first street from the intersection of the parade  
and Kensington and we would  
Be horrified if approval was granted. Unacceptable noise pollution would be the obvious trauma  
along with danger from an accident.

I work opposite the new RAH hospital at [REDACTED], in the Adelaide Day surgery building  
, and my husband an anaesthetist works in the RAH and we hear helicopters land and  
Take off frequently. The noise is disruptive to conversation at times, and considerably louder  
than one might expect.  
However it is necessary and to be expected opposite and above a hospital in the city centre.

Suburbia is of course a different matter. Please protect our suburbs from this unpleasant and  
unnecessary intrusion on our private family lives.  
Hospital staff deserve to finish work and relax. The helicopters signal emergency response to a  
critical patient . This emotional response is necessary at work, not at home.

Your assistance in preserving the suburb of Norwood as a home for families to relax in would be  
greatly appreciated.

Sincerely,

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** STOP PEREGRINE"S HELIPAD - Minister for Planning  
**Date:** Friday, 6 March 2020 6:58:07 PM

---

We live at [REDACTED] Beulah Park on the corner of Union Street - ( Im sure you'll google that up- not!! )

We are locals and will be directly negatively affected by this retarded proposal being considered by the Minister (Little Lord Fontelroy )

Oh i hope I'm not sounding disrespectful, emotional, cynical, negative etc as Im hoping to strike a note of middle class educated respectability while wrestling with the sheer (note german spelling) galling audaciousness of both the building itself but the Trumpian maniacal self absorption of a helipad proposal on top!!

The very fact that these development proposals actually achieve a 'consideration threshold' is comedy gold - it has a Calabrian, Sicilian or even Columbian probability about it!! - It has the 'wif' of the bogan Irish Aussie 'git' hand of Kevin Foley combined with the blind holocaust organising madness only the German descendant nephew of Terry Cameron (John Rau) could bureaucratically facilitate in his quest for political immortality (The Mike Rann Reich legacy of TOD's) - who knew it would include helipads!!

Jesus, Mary and Joseph!! Help save us from Little Lord Fontelroy (Stephan Knoll) and his Planning Department 'consultations'!! - sadly its made real by our local Billionaire oil / fuel /junk-food magnate, race car driver, general philanthropist, good guy and CALD persecution victim. Mr Shaheen ( notice it has an Irish ring about it that name!!)

We pray for him and his family every night because he only has seven service stations within 2 kilometres of his headquarters. Its awful unfair for him! Im sure he'll get nice quiet helicopters and we wont hear a thing at all! Perhaps he'll send some nice young Irish fellas to 'talk' to us and help us make our decision - We'll all get one each and build a helipad on our rooves too - right the way up the street

Firstly - we are disgusted with this proposal to build a multi story building on the current Peregrine Office site and worse still then to allow a helipad to be placed on top of the building to cater for these idiots.

Don't be fooled by the Shaheen money and the fawning amoral politicians and their sycophantic lackies - these are snake oil salesmen selling snake-oil.

Its not hard - REJECT this mad /bad proposal

[REDACTED]  
Beulah Park 5067 SA

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine Development  
**Date:** Friday, 6 March 2020 7:50:31 PM

---

Minister for Planning

[REDACTED]  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

Dear Minister,

I write in relation to the Peregrine Mixed Use Major Development Amendment Proposal, which seeks to establish a helicopter landing facility on the roof of the headquarters building.

As a local resident, I believe that this will effect the local amenity of my suburb (i.e. disruptive noise) and will pose a safety risk should there be a catastrophic incident in the built area. It also sets a precedent for developments of this kind in areas which are predominantly residential in nature.

It is also unclear to me why a helipad is needed given the close proximity of Norwood to the airport and the availability of alternative modes of transport to destinations such as the Bend, the Barossa and other tourist destinations.

I note that Peregrine has the ability to apply at a later date to increase the number of helicopter take offs and landings, meaning that the number of flights per year has the potential to exceed 10 per year.

As such, I strongly oppose Peregrine's application.

Regards,

[REDACTED]

Sent from my iPhone

**From:**   
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Submission on the Helipad on the Peregrine premises  
**Date:** Saturday, 7 March 2020 5:53:17 AM

---

Dear Sir or Madam,

I write in connection with the above proposed project at 270 The Parade. I have examined the plans and I know the site.

First, I should mention that I note that Peregrine is not showing any concern for the environment. If it did, it wouldn't be proposing to use helicopters. My second concern is one of its Values, which reads: *Determination: We don't stop until we win.* (I have never heard of a business with a similar type of value). Presumably, if the helipad application is rejected, Peregrine will keep trying until the community falls into line with its wishes.

I strongly object to the development. I wish to make the following comments and raise a number of questions. I look forward to your responses.

1. This submission is typical of a large business that wants to build something that may be controversial. It receives approval for the original submission for its building, about which there is nothing too controversial, and then asks for a little more (the helipad). The second planning application may be more difficult to refuse once the first one is approved. It is typical underhand dealing by a big business.

#### **Landings and take-offs**

2. How many helicopter landing facilities are in built-up residential areas?.
3. Given that most helicopter accidents happen when taking off or landing, there should be empty land around the helipad in case the worst happens.
4. It is only 30 minutes by car to Norwood from the airport. Why does Peregrine need a helipad in a residential area?

#### **Landings and take-offs numbers**

5. It has been proposed that the helicopter landing facility will only be used for up to ten days per year. I guarantee that this will not work, despite any number of promises from Peregrine. There will be "helicopter landing creep" within 12 months ... and nobody will be able to do anything about it. No limitation has been proposed for the number of times per day that the landing facility may be used on each of those ten days. So, how will the number of landings be limited?
6. Will the community know in advance which days are being used for landings? Who will keep records of the helipad use and make those records available to the Council and others?
7. What will happen if Peregrine flies on more than 10 days? How will the 10 days flying be enforced?
8. How will we know if a flight is an emergency?

#### **Risks re Landings and take-offs**

9. What are the risks associated with the proposed helicopter landing facility and how will they be managed? The powers-that-be cannot make an informed decision on the information provided as it is lacking in some details.
10. On 18 February, the author of the *Aviation Specialist Advice* report, Mr Colin Weir, advised that:

*there has only been one emergency landing in this area in the past five years (but that's because there is no helipad in the area, so helicopters aren't flying towards the area. If I have made an error, how many helipads are there in the area?);*

*the majority of incidents involving helicopters occur in proximity to take off / landing*

(which will make the helipad a huge potential for a disaster, especially if a helicopter falls off the roof), and

*In an emergency landing situation helicopters, unlike fixed wing, only require a small area for an emergency landing"*

(surely that depends how the helicopter is coming into land, the wind and the angle. Fuel may be spilt over a wide area).

11. Despite the response to risk in the *Aviation Specialist Report*, there is always a risk of an incident, including a crash, close to the proposed helicopter landing facility. Such an incident would be catastrophic, given the built-up surrounding residential area and the high volume of traffic along The Parade and Portrush Road.
12. Helicopter crashes do happen and when they do, it is most often associated with take-off or landing. Locating a helicopter landing facility in a built-up urban environment results in an inherently high risk, due to the catastrophic nature of the consequences if a crash.

### Noise and Vibration

13. At the public information session at the Norwood Concert Hall on 18 February 2020, Mr Chris Turnbull, stated that *the 95-100dB (A) peaks in background noise recorded in Bowen Street, were likely associated with a car driving past*. However, it is really equivalent to a jack hammer at 50m (see <https://www.gcaudio.com/tips-tricks/decibel-loudness-comparison-chart/>). The noise would affect and disrupt the residents and businesses in the area.

### Rotor blade downwash and rotor wake

It is always better to keep helicopters away from people. Has a risk assessment been properly undertaken? Such as:

Risk Element	Risk Description	Risk Mitigation
People	Secondary effects of Foreign Object Debris (FOD) such as dust and sand or other objects becoming airborne causing injury	Ensuring that the helicopter movement areas have an appropriate surface and designing helicopter movement areas away from people
Buildings	Operational effects on hangars and other building structures resulting in damage to cladding or other structure elements exceeding wind design loads	Designing the helicopter movement areas away from buildings or ensuring buildings are designed to withstand additional load
Light aircraft	Impact on light (recreational or general aviation) aircraft while taxiing or in aircraft parking zones	Ensuring sufficient separation between helicopters taxiing or in aircraft parking zones
Helicopters	Brownouts during landing procedures causing loss of spatial awareness and resulting in a hard landing or helicopter crash	Ensuring effects of the zone of influence related to downwash is understood to allow an appropriate landing surface to be constructed

From <https://jjryan.com.au/index.php/helicopter-rotor-downwash-excessive-wind-fod-and-brownouts-what-are-the-risks/>

Have all the above been considered and met?

**Peregrine Corporation Public Environment Report**

14. Re the *Public Environment Report* submitted by the Peregrine Corporation for a helicopter landing facility at 270 The Parade, Kensington: who wrote it? It doesn't appear to be by an independent organisation, which it should be

I look forward to your response to my points. I am also happy to meet with you should you so wish.

Regards

[Redacted]

NORWOOD SA 5067

[Redacted]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Att: The Minister for Planning c/- Robert Kleeman, Dep. of Planning, Transport and Infrastructure  
**Date:** Saturday, 7 March 2020 3:17:07 PM

---

Dear Mr. Knoll,

I am writing to add my voice to the many who are pleading with you not to allow the building of a helipad on top of the proposed new Peregrine building on the corner of Portrush Road and the Parade.

I live in [REDACTED], Beulah Park, barely 500 hundred metres from the Peregrine site.

It is one thing to allow the erection of a seven storey building in what is essentially a residential suburb, but we are told that we have to move with the times and not stand in the way of progress.

So be it.

The proposed 'tower' will inevitably and permanently alter the visual nature of the district in which we live, but it will not affect our private daily lives in our own homes.

The addition of a helipad on top of the building, however, will do so, forcibly and inexorably, on those occasions when it is in use.

Were this necessary for the common good of the general community, such as the building of a helipad for the transportation of the sick or injured, one would learn to live with it.

But this is not so in this case.

It is being provided for a private company for the use of its privileged clientele.

Whatever your political leaning, you would have to agree that to allow this project to proceed would not be acting in the best interests of the people who elected you to represent them,

and to serve their best interests.

It would not provide significant additional employment, or enhance the amenities of the area, or increase the value of nearby properties.

In fact, it would do exactly the opposite, and it would severely disrupt the private lives and wellbeing of those who live in the vicinity of the project.

In all good faith, I trust you will give this honest and heartfelt plea your serious consideration.

In anticipation of your early reply,

[REDACTED]

[REDACTED], Beulah Park, 5067

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Stop Peregrine Helipad  
**Date:** Saturday, 7 March 2020 5:11:58 PM

---

My husband and I are totally against a helipad being erected and used by the Peregrine corporation in the suburban areas of Adelaide. It would be distracting and dangerous to even think about. We have an airport for everyone to use, let them use that.

[REDACTED]

[REDACTED]

Paradise SA 5075

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine"s Helipad proposal objection.  
**Date:** Saturday, 7 March 2020 5:29:45 PM

---

I am a resident on Portrush Road, Norwood [REDACTED] and I object very strongly to this proposed development which appears to be required for social/business social requirements of the Peregrine group.

My objections are based on noise and safety considerations for helicopter landings/takeoff in such a built area over 7 days of the week and after business hours.

I worked at the [REDACTED] under a helipad for many years and understand the noise factor. I am sure Peregrine with attempt to mitigate the noise factor for their employees but the residents, schools and businesses nearby should not have to do the same. At least the helipad at the hospital was utilised for life saving and not social requirements.

However well planned safety measures for this project are there is no guarantee that all accidents can be prevented nor can anyone control weather conditions. If there is an accident there will be investigations and public clamour as to why this project was even considered let alone approved, far too late for those affected.

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrines helipad  
**Date:** Sunday, 8 March 2020 8:29:00 AM

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I strongly object to this project, we live in a residential area and it is not acceptable to have this degree of noise. Helicopters should only be used in extreme circumstances by emergency services personnel. Please think very carefully about your decision as this could create a precedent for future conglomerates. Regards [REDACTED]  
[REDACTED] St Kensington.

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Stop Peregrine"s Helipad - DISAPPROVE  
**Date:** Sunday, 8 March 2020 6:42:37 PM  
**Attachments:** [image637dec.PNG](#)  
[image40f1f3.JPG](#)

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Hi

I wish to express my disapproval at the proposed helipad application for the Peregrine site on Portrush Rd.

I am a local Norwood resident, with a child at local school, and as such feel very strongly that such a proposal is not only a safety concern, but also will contribute to increased noise pollution, traffic congestion and decrease the neighbourly feel of the local area.

Regards [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED] [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  


[REDACTED]  
[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Major Development Proposal - Peregrine Mixed Use Major Development - Variation 2 Helicopter Landing Facility  
**Date:** Monday, 9 March 2020 8:35:40 AM

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Minister for Planning

[REDACTED]  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure

I am writing in response to Peregrine Corporation's proposal to build a Helicopter Landing Facility on the top of its new office building on the corner of Portrush Road and the Parade.

I am a resident of Beulah Park and I have two daughters who go to school at Marrayatville Primary School.

I oppose the proposal on the following grounds:

- No public good.
- No proper assessment of risk
- Inconsistencies with key planning documents
- It will create a precedent

### **No Public Good.**

The Government has broad powers to develop public infrastructure. It can compulsorily acquire land, it has its approvals fast tracked and it willingly inconvenience thousands of us during construction. We give Government these powers and we are happy to put up with the inconvenience because the infrastructure it builds is for the greater good of us all. It improves our liveability and contributes towards our prosperity, whether it is roads, schools or hospitals.

In contrast the Peregrine helicopter landing facility is being developed for the private needs of a private company, it will not be available to use by the general public, third parties or for emergency response situations. It is an item of convenience for a select few that can afford the luxury of private air travel.

Having rooftop helicopter landing facilities is not an indicator of a city's progress or an attractor of global investment. Commercial helicopter flights in Beijing are restricted. In London helicopters are limited to specific routes into and through the city. Paris has a strict no fly policy where non-military aircraft are banned from flying below 6,500 feet. Los Angeles no longer requires new skyscraper to have helipads because of the noise! Following a fatal rooftop helicopter crash landing in New York city late in 2019 there was a push to ban non-essential helicopter traffic from that city. The higher probability of low flying helicopters requiring emergency landing contingencies is demonstrated by the requirement for Peregrine to identify crash zones, which leads me to the next point.

### **No Proper Assessment of Risk**

Proponents of air travel highlight the mode's impressive safety record. But the safety record of air travel is skewed by the record of commercial airline travel. Crash rates for small aircraft are much higher than for commercial airlines, and helicopter crash rates are among the highest. Helicopters that fly at low altitudes near tall buildings, trees, power lines or hills suffer the worst crash rates. The recent crash in the United States that claimed the life of Koby Bryant and 8

other people highlight this point. In 2019 there were 9,393 commercial helicopters in the USA, 24 had fatal accidents. A rate of two fatal crashes a month. The emergency laydown areas included in Peregrine's proposal implicitly acknowledge helicopter travel's higher risk.

The emergency laydown areas identified in the Aviation Specialist Report appear to have been selected from a casual browse of google maps. Every green space within a mile radius of the helipad appears to have been selected. Mr Colin Weir, the aviation consultant who wrote the Report for Peregrine, and whose expertise and knowledge I would not doubt for a second, is based in Queensland. Nowhere in his report does he say he visited the site or the emergency laydown areas. Of the 8 emergency laydown areas identified in Mr Weir's report, 6 are schools: Saint Ignatius College, Loreto College, Pembroke College (twice), Marryatville High School and Marryatville Primary School. Of the other two areas, one, Kensington Oval, is used by Pembroke College. Some of these locations are very small and all are ringed by tall trees and power lines. Given the low altitude that helicopters propose to fly in the immediate vicinity of the helipad (just a few hundred feet) they would present a very small target for a distressed helicopter to try and land on. Given that Peregrine propose to use the helipad only in daylight hours it is likely there will be children present on any given day.

I have received personal communication from [REDACTED], the principal of Marryatville Primary School, that as at 19 February 2020 the proponent has had no communication or contact with her about the potential use of the school grounds for an emergency laydown area and what this means for school, staff and students. The grounds of Marryatville Primary school have high voltage electricity transmission lines almost perfectly dissecting the school oval – running directly over the cricket pitch, in addition to being ringed by tall trees. This would make an emergency landing at the school particularly hazardous. A helicopter collision with the power lines while attempting an emergency landing with dozens of children on the oval could result in a catastrophic outcome.

We live in an era where we are very risk averse and seek to eliminate or minimise risk as much as humanly possible. Children cannot bring food to school that may contain nuts in case they end up being ingested by someone with a nut allergy; parents cannot escort their child on a school excursion without a documented police check; office workers who sit at a desk are not allowed at work with any alcohol in their system, a convention that applies at the Department of Planning, Transport and Infrastructure.

Minor construction projects are required to have risk registers with every conceivable risk listed along with their likelihood and consequence. Treatments for each risk are documented along with their resulting impact. At work we have safety moments, safety walks and are encouraged to intervene if we see a colleague doing anything risky. Yet Peregrine's proposal for a helicopter pad amongst a residential area, close to so many schools, churches, an electricity sub station, a bust section of the national highway network, powerlines and a popular retail precinct appears to be missing such a risk register or similar approach to risk identification and management.

### **Inconsistencies With Key Planning Documents**

The 30 Year Plan for Greater Adelaide includes a number of policies aimed at avoiding the encroachment of economic infrastructure from incompatible land uses and preventing land use conflict. Policies 77 and 84 explicitly talk about separating airport infrastructure from housing, while policy 68 is about clustering business around key transport infrastructure (including airports) to maximise the economic benefit of such infrastructure. The proposal to place a helicopter landing facility in the heart

of suburbia is at odds with these policy directions and creates land use conflict.

The 30 Year Plan for Greater Adelaide includes much content about improving Adelaide's liveability and amenity and creating sustainable communities. It talks about the neighbourhood I currently live in. Until five years ago I had lived under Adelaide Airport's flight path all my life with a constant stream of aircraft during every waking hour. I haven't missed it for a moment. It's a benefit of living in our area that can't be quantified. Now I find the aircraft noise is chasing us with the take off path directly over our house adversely impacting our liveability and amenity.

### **It will create a precedent**

The granting of approval for a helicopter helipad on the rooftop of a building in such a sensitive area where it will abut a residential area, numerous public and private schools, a place of worship and a popular boutique retail precinct, an area with many large trees and high electricity lines feeding the Beulah Park substation will set a precedent that similar rooftop helicopter landing pads can be established in almost any other location in Adelaide. Once approval is granted everyone in the area will just have to get used to, because it will be near impossible to revoke it.

### **In conclusion**

Peregrine Corporation is a great company and deserves all the success they have achieved. They employ many South Australians, provide services to hundreds of thousands daily and support many charitable and community events. What they have done at the Bend Motorsport Park is fantastic. However I oppose the construction of a helicopter landing facility on the top of their new building at 270 the Parade Kensington

I have confidence the Planning Commission will make an objective assessment of this development proposal. In doing so I hope it is not influenced by those inside and outside of government who think that anything good for Peregrine is good for the state.

Regards



**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Cc:** [REDACTED]  
**Subject:** Attention: [REDACTED] re Peregrine Corporation Helicopter Landing Facility-270 The Parade, Kensington  
**Date:** Monday, 9 March 2020 11:34:43 AM  
**Attachments:** [Peregrine Corporation Helicopter Landing Facility .docx](#)

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Dear Mr Kleeman,

Please find attached my letter detailing my response as a resident of the Norwood Payneham St Peter's Council area to the proposed Peregrine Corporation Helicopter Landing Facility at 270 The Parade, Kensington.

Sincerely

[REDACTED]

[REDACTED]  
Kensington 5068

9 March 2020

The Minister of Planning  
[REDACTED]

Department of Planning Transport and Infrastructure

GPO Box 1825

Adelaide SA 5001

Dear Sir

Re: Peregrine Corporation Helicopter Landing Facility 270 The Parade Kensington

I am a local resident of Portrush Road at Kensington and I write to express my strong opposition to the proposed helicopter landing facility at the Peregrine building at 270 The Parade Kensington.

I submit that the proposed helicopter landing facility is not a suitable or appropriate use of the land on several grounds which include the following:

- (a) The location of the proposed landing facility is situated in a closely settled area comprising residential properties, schools, aged care facilities and commercial premises, as well as being surrounded by heritage properties on three corners of Portrush Road and The Parade. The use of the helicopter landing facility in the manner proposed will cause significant disturbance and loss of amenity to other land users in the form of significant additional noise, vibration and nuisance over significant areas.
- (b) Further, as flight paths may need to be variable because of variable weather conditions, it is not possible to specify precisely what approaches to the landing facility will be required, and so the areas to be impacted by the use of the facility cannot be specifically defined, giving rise to the possibility that the area so affected could be very large indeed and a far greater area than has been contemplated in the Aviation Specialist Advice report as tendered by the proponent of the helicopter landing facility.
- (c) The nature of the closely settled area surrounding the proposed helicopter landing facility raises acutely the issue of risk and safety of residents, school students and property, in the event of a catastrophic engine failure. It is noted that many local school ovals and a public park have been nominated as emergency landing sites. I submit that the designation of these sites is potentially very unsafe as it is readily foreseeable that school ovals and other public parks would be occupied at precisely the times at when an emergency arises and in circumstances giving little or no time for such areas to be cleared for the sake of an emergency landing.

In other words, a pilot is likely to have little or no opportunity to determine where such a landing such occur in the event of an emergency. The presence of the landing facility imports into the area a danger and risk which is unnecessary noting that most aviation emergencies arise in the context of landing and taking off.

In line with the legal authorities, it must be determined, as an initial question, whether the use of the land is appropriate. If it is determined that the use of the facility is appropriate only then should conditions be applied. As proposed, the facility would be limited to use on 10 days of the year between 7.00 am and 10.00 pm during "daylight hours". The proposal does not state how many movements are anticipated on each of the 10 days.

I submit that it would be inappropriate to grant the approval subject such a condition when the full extent of the use of the facility has not been specified. In other words, it is not known what exactly is being approved.

It is further noted that it is not known how any condition would be enforced and what sanctions would be imposed if conditions have been breached.

In summary, it is submitted that provision of the helicopter landing facility in such a closely settled area presents an unacceptable risk to residents, school students and other land users and will cause significant loss of amenity to land holders and other users. If approval is given for the helicopter landing facility subject to conditions, the full extent of the use of the helicopter landing facility i.e. the number of uses on the 10 days, is not known and so approval would be given without knowing exactly what has been approved.

Thank you for consideration of my submissions.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine"s helipad  
**Date:** Monday, 9 March 2020 12:14:10 PM

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Dear Sir/Madam

I am writing to register my strong opposition to Peregrine's proposed helipad. There can be no realistic justification to have a helipad in the middle of a residential area of Adelaide other than corporate vanity. A medium sized business which has no links to the provision of emergency services to the community has no need to foist the noise and attendant dangers of a helipad in such a location.

I respectfully request that permission is not granted for the building of the proposed helipad in the Kensington/Norwood area.

[REDACTED]

[REDACTED]

Kensington



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

[REDACTED]

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

- Club members have asked me to convey their concerns
- ① Battery reserve is not suitable as an emergency landing place. The lighting system has 16 upright poles & wiring within the reserve space
  - ② How will the helicopter movements be monitored regarding frequency <sup>& resp</sup> & noise impact on surrounding community





# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

## What could be done to address your concerns?

- To cancel the helipad element in the design.
- Move the helipad to open space, eg Rembroke oval / sports ground. - A large open space.

## Other general comments:

To have helicopters landing in a built up community is tempting disaster and irresponsible.

[Redacted]

Norwood

[Redacted]

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

[Redacted]  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[Redacted]



Government of South Australia  
Department of Planning,  
Transport and Infrastructure



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name ... [Redacted] Address ... [Redacted]  
 Telephone ... [Redacted] Email ... [Redacted]

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

RECEIVED  
10 MAR 2020

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

*Residents have brought into this area with the septation of a certain quality of life. The noise from the helicopter landing and taking off many (8x2) times a day will reduce this quality of life and the value of their properties. The effect of strong vibrations on local heritage buildings particularly Clayton Wesley Uniting Church can only be detrimental as will the additional noise for people attending services such as funerals at the church. One clergy member will not be of assistance in these cases. There is also a danger of crashes in a residential area where there are also a number of schools which have been listed as viable options during catastrophic engine failure. This is not an acceptable land use in a residential area.*





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

*This development should not be approved*

Other general comments:

*There is no benefit to local residents in this proposal. It will only greatly assist Peregrine in the conduct of its business operations. The expected business meetings could be held in other locations or the dignitaries and business guests could go by limousine to the airport or perhaps drive to Foulm Bay through our beautiful Adelaide Hills (perhaps stopping at a winery along the way to support the local economy). Residents should not be expected to tolerate this disruption to our daily lives just for the benefit of a business operation.*

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[Redacted]



Government of South Australia

Department of Planning,  
Transport and Infrastructure

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine Head Office Development - Helipad Objection  
**Date:** Monday, 9 March 2020 12:21:29 PM

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Attention : Minister for Planning  
[REDACTED]

We are writing to voice our objection to the inclusion of a helipad in the proposed redevelopment of Peregrine's office located on the corner of Portrush Road and the Norwood Parade.

Of particular concern is the noise of the helicopter, and the safety risks associated with introducing this type of transport within a built up residential area.

The selected viable options for effectively crash landing the helicopter due to a "catastrophic engine failure" are almost exclusively all schools which provides a very concerning situation in the event of engine failure. Should there be an engine failure it would appear the best option is crashing into a school. The statistics concerning helicopter travel provide very little comfort regarding long term air traffic over our local area, beyond the suggested locations the second option would be crashing into a built up residential area.

The noise of helicopter flight (in additional to heightened noise associated with taking off and landing) will be detrimental to our living environment and is a concern.

These two factors are likely to have a negative impact on house prices.

Should, somehow, this proposal receive endorsement:

- What protection do we have that the conditions put forward will be enforced?
- What penalties will be put in place in the event of a breach?
- The flights are to be limit to daylight hours, but there is a curfew of 10PM. How will this be managed? (Also with a start time 7am this will obviously cause issues with the neighbouring nursing home)

We trust that common sense will prevail and the helipad will be removed from the development.

Regards

[REDACTED]

[REDACTED], KENSINGTON

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** RE: Major Development proposal Peregrine mixed Use-Variation 2 helicopter landing facility  
**Date:** Monday, 9 March 2020 12:34:17 PM

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Minister for Planning

[REDACTED]  
Dept. of Planning, transport and Infrastructure  
Adelaide

Dear Sir            Re Variation 2 Helicopter landing facility Peregrine Development

I would like to make this written submission as follows:

As a resident of Norwood I am opposed to the proposed [helicopter landing pad on the Peregrine](#) development for two reasons.

1. Provision for the Helicopter landing facility in Norwood Council area close to schools, aged care homes and other residential accommodation would create a precedent which may encourage organisations to seek similar facilities in residential areas. Providing a pleasurable experience for clients is hardly a sound basis to build the Peregrine case.
2. The proposal relies on a legal technicality as far as the provision of strict environmental noise regulations apply. It does not accept all the comments made by the EPA and DPTI. It also rules out the need for any consideration of CASA requirements even on a voluntary basis. There is no consideration of the impact of noise on broad council residential area. The noise level has been calculated for some specific locations however there is no consideration for the overall impact - which [could](#) be considerable. No more than 10 days a year are allowed for helicopter operations between the hours of 7am and 10pm at night. What about the people who don't get up till 8am in the morning or [who](#) go to bed earlier than 10pm? It is not pleasant when [abruptly awoken from](#) asleep. The proposed hours of operation could have an adverse social and health effect on any resident in the area – this has not even been considered in the report. [Noise pollution will affect the value of property within the area.](#)

The required action to address the concerns .

Refuse the application. However if the project is given approval to proceed it should be under "specific requirements". A trial period for 12 months combined with a monitoring programme followed by a public survey and evaluation would provide the company the opportunity to demonstrate the helicopter landing variation is not intrusive. An additional requirement would be to limit the hours of operation from 8am to 8.30pm. There should be no flights on Sundays and operations should be restricted to 10 months of the year to allow for 2 months free of noise pollution. An annual licence to operate should be in place if the project proceeds past the trial period. All monitoring costs should be met by Peregrine.

Thank you for considering this submission.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED] NORWOOD SA 5067

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Cc:** [REDACTED]  
**Subject:** Attn Minister Kleeman Objection Peregrine helipad  
**Date:** Monday, 9 March 2020 12:56:33 PM

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Dear Minister [REDACTED]

I live a few streets away from the location of the proposed helipad in a quiet suburban neighborhood. We will be directly affected by the noise of helicopters arriving and departing from this facility.

The sound of helicopters is uniquely disturbing. It's not just the volume (though that is much too high) but it is the association of this sound with medical emergencies, police pursuits and military activities. It is not an exaggeration to say that it will destroy the peace of this neighborhood. Would you put up with this near your family home?

Please intervene to stop this development to maintain the amenity of a peaceful suburban area and the wellbeing of the people who live here. It is hard to see any reasonable argument for its approval.

Regards,

[REDACTED]

Sent from my iPad

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Re Proposed Peregrine Helipad  
**Date:** Monday, 9 March 2020 2:14:32 PM  
**Attachments:** [Minister for Planning.docx](#)

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March 9th 2020

[REDACTED]

I have posted a copy of the attached letter but to make certain my letter reaches your Office no later than March 13th I am also emailing this which comprises of two pages.

Yours sincerely,

[REDACTED]

Minister for Planning



Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

March 9<sup>th</sup> 2020

Dear Minister

**Re: Peregrine Mixed Use Major Development-Variation 2 Helicopter Landing Facility**

I am writing to express my alarm and dismay at the proposal by Peregrine Corporation to install a helipad on top of their proposed major development.

We have an Airport five minutes drive from the City for this very purpose. This is the most practical and safe option. In my opinion.

The recent information session did little to assuage my fears that the quality of life of those of us who live and work in High Street and surrounding streets would be seriously impaired by helicopters; even though we were assured that it would only be for ten days per year. The noise of an approaching helicopter, the hovering to land and subsequent down drafts cause me grave concerns. We were led to believe at this meeting that there was to be no restriction on how many flights would occur on these ten days. It was stated that flights would occur during daylight hours between 7 am and 10 pm. It would be quite miraculous to have daylight at 10 pm at night !

Apart from the reality of not **IF a crash occurs but WHEN** there is also the problem for many motorists who could be easily distracted along Portrush Road and The Parade. The sudden appearance of a helicopter could easily cause serious accidents. **We were not reassured when a speaker at the information session had to agree that the most likely time for a helicopter to crash was on landing and take-off !!!**

The extremely long collection of Reports comprising the Public Environmental Report does not recognise the Sisters of St Joseph, (of which I am a member) as a significant neighbour. On page 27 of 39 under 5.2.2 reference is made to an earlier conclusion that, "Local heritage impacts are largely negligible, with only two adjacent Local Heritage places, **both of which are remnant former residential buildings.**" The front of our Convent does have local heritage listing and it is and will remain a residential building-and our home-for many years to come.

In conclusion, I object to this development based on the following concerns:

- Lack of assurances regarding the number of helicopter movements in each of the nominated ten days.

- The significant impact from noises and safety on a predominately close residential area.
- Lack of emergency landing areas. The proponents have indicated that nearby school ovals could be used as emergency landing areas. This strategy is troubling. School ovals are in constant use by the students
- 

I sincerely hope that common sense will prevail and the application for the proposed helipad be refused.

Yours sincerely,



KENSINGTON PARK  
SA 5068

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Major Development Proposal Peregrine Mixed Use Major Development - Variation 2 Helicopter Landing Facility  
**Date:** Monday, 9 March 2020 4:08:17 PM  
**Attachments:** [Peregrine Mixed Use Major Development-- Variation 2 Helicopter Landing Facility A M IDE.docx](#)

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**Attached submission from:**

[REDACTED]  
[REDACTED]  
**Felixstow SA 5070**

I cannot scan my signature as I don't have a working printer.  
By all means contact me on [REDACTED] if you need to verify that I have forwarded the attached submission.

Thanks

[REDACTED]  
[REDACTED]

## Submission

### Minister for Planning

[REDACTED]  
Department of Planning,  
Transport and Infrastructure

[REDACTED]  
Felixstow SA 5070  
[REDACTED]

### Major Development Proposal Peregrine Mixed Use Major Development - Variation 2 Helicopter Landing Facility

I lived in the suburb of Kensington (1991-2007) was a [REDACTED]  
[REDACTED]

#### I am totally opposed to the proposed development because:

- There is no guarantee for the safety of anyone in the reasonably densely – populated areas of Beulah Park, Kensington and Norwood, including the shopping precinct & those passing nearby
- There has not been a comprehensive consultation of residents and schools in the vicinity. They have just been **told facts by Peregrine**, particularly re aviation and noise issues. Is this information accurate?
- It is of no community benefit to surrounding residents and businesses. Peregrine gives nothing back to the immediate community – how many jobs will be created for residents?  
At the consultation meetings it was indulgent for Peregrine’s ‘Community Engagement’ person to be given so much spruiking time, especially given the audience need for facts on the topic
- Noise will be excessive on taking-off and landing – more than the noise of a large truck driving along Portrush Road
- Helicopters flying in and out on permitted days will be a distraction for vehicles of all sizes travelling along The Parade and Portrush Road, being responsible for some accidents.
- Danger in the case of helicopter –related incidents and accidents.
- Schools should **NOT** be used in the case of an emergency – proper consultation is needed not an assumption on Peregrine’s part that a helicopter can land on school properties and in a Council park. The Department of Education should be consulted for State Schools, The Catholic Church for Catholic Schools in the vicinity and nearby Pembroke School. Also the two local Councils
- Risk of damage to a heritage Clayton Wesley Uniting Church – structural and to leadlight
- Heritage buildings in neighbouring suburbs of Beulah Park and Kensington could be affected as helicopters, we were told, are to fly north south
- Peregrine should have selected a more appropriate site as they had a plan to use helicopters

**Peregrine Corporation is strategic; plays 'the long game' and like its bird symbol pounces unexpectedly, but expects special favours to get what it wants, not on need, but greed, pretending it cares for the community.**

**I wrote the following letter to *The Messenger* re Peregrine. It was printed 19 Feb. 2020**

[Redacted]

Sun, Feb 9, 6:10 PM

So OTR owner Peregrine Corporation's eagle 'needs' to be able to take off and land. (Messenger p.03 Feb 5 2020).

Local individuals and groups - such as Clayton Wesley Church and Kensington residents, have expressed their concern at a Helipad in an inner suburban area and so close to the Norwood precinct.

Nearby suburbs of Beulah Park and Kensington hold sought- after heritage housing stock. There are also six schools within close proximity in Kensington, Kensington Park, Marryatville and Norwood.

**Helicopters were banned from landing on rooftops on New York City in 1977.**

Not matter how 'The Eagle,' argues its case after endless reports, the risk of such a project is soaring upwards. The public does not want any deadly landing.

[Redacted]

Felixstow (5070)

[Redacted]

**Peregrine Corporation should not be permitted to ever apply for a further variation re their helicopter landing facility as it will want more days to fly visitors in and out from their new operational site.**

**The location is totally inappropriate for such a facility and the risk to residents and the passing public is too high.**

**Peregrine Mixed Use Major Development - Variation 2 Helicopter Landing Facility should be refused.**

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** STOP PEREGRINE'S HELIPAD  
**Date:** Monday, 9 March 2020 5:40:44 PM

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To Minister of Planning

My husband and I are local residents of Norwood who will be impacted by the regular take-off and landings of a noisy helicopter. I am hoping this note will be read with serious consideration and hope you will consider this decision as if it is your back yard. Residents particularly in suburban areas are entitled by law to the quiet enjoyment of their property. Currently we sit outside enjoying the ambiance of our location, the trees with the native birds chirping and in all honesty the bees buzzing. Having a helicopter decreasing its altitude as it comes into land some 250 metres from my home is most definitely going to spoil our peace. The State Government owes ***a duty of care*** to the local residents as we are the persons being affected by the noise.

The State Government also has a duty of care in respect of safety of the residence. Building a helicopter helipad and allowing helicopter operations is placing the lives of people in the nearby community at risk. In addition to domestic housing there are also schools and a major shopping precinct nearby. Notwithstanding any operating plan setting out times of day and flight paths helicopters have a poor safety record. Pilots are often expected to fly in conditions that are not suitable and sometimes when the machine suffers a mechanical problem there are no margins for a safe landing.

**In this city how is it that:**

1. PEREGRINE cannot drive to and from the airport like the rest of us?? It is only a 15-20 minute drive, this is not Sydney with traffic jams.
2. YOU could even consider agreeing to this Helipad when we should all be reducing our air miles for the sake of our environment. Protecting our environment isn't a job just for the ordinary person but for everyone including our STATE GOVERNMENT.
3. THE government feels they need to indulge this business by giving permission?
4. Finally, when this government was elected by the electorate, YOU the member was expected to reflect and support the will of the people that have put you in power. Individuals must be strong when approached by people of business who have money, power and position. Remember you have the people of Norwood and State Government behind you to support you do not falter.

Can I encourage you minister to do "What is Right" and put this matter to the vote within the nearby community.

I look forward to your reply.

[REDACTED]  
[REDACTED]

Norwood

PS

We are both paid up members of the Liberal Party.

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** STOP PERGRINE'S HELIPAD  
**Date:** Monday, 9 March 2020 5:41:45 PM

---

Minister for Planning

[REDACTED]  
Department of Planning, Transport and Infrastructure

Dear Sir,

The proposal to allow a helipad to be built at the proposed location should NOT be allowed for the following reasons:

1. **LOCATION:** The proposed location is right next to one of the busiest intersection of 2 major roads - Portrush Road/The Parade with nearby schools, residential and business buildings. Should any unanticipated consequences attributed to problems with the aircraft resulting in a crash landing, the impact on the community would be catastrophic!
2. Why is it so important that unprecedented privileges be granted to Peregrine to allow it to indulge in potentially dangerous and pretentious activities/pursuits which could cause inconvenience to surrounding schools, businesses, residents as well as impacting on traffic.
3. The argument for entertaining "important" guests which could lead to more business(?) is a flimsy and unsubstantiated.
  - a) would guests treated to frivolous and pretentious pursuits of the wealthy and privileged (whose total disregard to the well-being of the community) be engaged in serious business discussions enroute to a motoring race?
  - b) The Adelaide Airport is not far from Norwood and is easily accessible. It has all the support services ensuring safe flying practice.
4. In the case of Peregrine, who would vouch for the strict compliance to Safety Regulations and frequency and duration of usage if the helipad was allowed?  
Who would police the frequency, duration and usage of the helipad, given the usual departmental understaffing?

I hope the Minister's Planning Department will pay heed to these serious and genuine concerns of the community.

Yours faithfully,

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Minister for Planning.docx  
**Date:** Monday, 9 March 2020 5:43:15 PM  
**Attachments:** [Minister for Planning.docx](#)  
[ATT00001.txt](#)

---

Please find attached letter re Peregrine helicopter landing facility

Kind regards

[REDACTED]

Norwood SA

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide 5000  
09/03/2020

Dear Mr Kleeman

I am writing to you as the committee secretary representing the tenants of Nuova apartments 254-256 The Parade Norwood. We are voicing our serious concerns and objection related to the proposed construction of a helicopter landing facility on the roof of Peregrine redevelopment located at the south eastern corner of Portrush Road and The Parade Norwood.

It is with sheer disbelief that one can even contemplate considering a helipad on the above-mentioned redevelopment. This is a residential area consisting of private homes, apartments, schools, historic building let alone the busy Portrush and Parade Roads. The Parade is a beautiful precinct that enhances the Norwood area and hence one of the reasons why many of us purchased apartments in this state of the art building never realising at time of purchase that a helicopter landing facility would even have been on the agenda for a neighbouring development. This is a remedy for disaster and needs to be stopped immediately, there is no evidence of an overall evaluation of the risks associated with the proposed helicopter landing facility. Most incidents involving helicopter landing facilities occur near take-off and landing. Placing residents and others in this area at such significantly high risk of potential harm is nothing short of madness.

The Peregrine Corporation has produced a substantial Public Environmental Report which in the main deals with technical and planning requirements. Peregrine Corporation feels the helicopter landing pad is an integral part of the overall development if this were the case why did they not apply for same in the original redevelopment application. To think that the Helicopter landing facility will be restricted to use for 10 days per year is crazy. How many times will be it be used on those days and who will monitor the frequency of use? Once it is there it will be open slather. This is creating a precedent for a select group who seem to have the money and power to do what they want in South Australia.

The noise from the helicopters will be significant and has the potential to adversely impact on all residents living within the area, traffic traversing Portrush Rd and the Parade, those shopping and hoping for a nice peaceful dining experience. The rotor wake has the potential to cause significant vibration and have an adverse effect on surrounding buildings including 2 heritage listed iconic churches near the helicopter facility to name but a few.

In summary the impact of the proposed helicopter landing facility will be significant let alone the major risk factors associated with such a venture. Surely Peregrine "visitors" can endure a trip to the Adelaide airport as would be the case for all other members of the community regardless of their profile. Why should we the residents near the proposed helicopter landing facility be placed at such risk and endure the noise and other inconvenience for the pleasure of a very select few people who bring no community or business benefit to this area.

Yours sincerely

Secretary Nuova Apartments Committee

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine Helipad objection  
**Date:** Monday, 9 March 2020 6:22:02 PM

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Hi there,

I'm a past resident of Norwood and live nearby. I love the area and I know so many others do too. I am concerned about the proposal for a helipad. It will seriously effect the calm peaceful nature of this area and will cause a loss of enjoyment for many residents, as well as the potential for catastrophic accident. This makes it inappropriate in my view.

I think the rights of the many residents and those who call The Parade home are worth upholding and the Shahin's can use the airport like everybody else if they want to go to Tailem Bend or anywhere else.

Thanks

[REDACTED]  
Payneham

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Opposition to the proposed Peregrine HELIPAD in Kensington SA  
**Date:** Monday, 9 March 2020 9:48:10 PM

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Dear Sir/Madam,

I write to add my voice in opposition to the proposed Helipad development in Kensington due to the serious concerns about the level of noise that would be generated by the daily aviation over the densely situated houses and the narrow streets in my neighbourhood.

Residences in Kensington are relatively old in structure and small in sizes, therefore, the noise impact would be more severe and prevailing. It is also due to a consideration to the safety for the children to and from the schools in this area. The psychological impact over children from the potential aviation accidents in the local school ovals should not be underestimated.

Thanks for your due consideration.

Sincerely

[REDACTED]  
[REDACTED]  
[REDACTED]

Kensington 5068



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.



What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

It is not appropriate to have a helipad so close to residential, education and shopping areas, particularly when the Adelaide Airport is so close.





**From:** [REDACTED]  
**To:** [DPTI: State Commission Assessment Panel](#)  
**Subject:** Peregrine Helipad  
**Date:** Tuesday, 10 March 2020 10:05:30 AM

---

Good Morning,

I write to you as a resident of Kensington in relation to the above.

I have taken the time to reflect on information provided across a number of resources and have come to a conclusion that I don't feel the allowance of this private operation to go ahead is in the best interest of the area, my family, and the broader community in which it surrounds.

I ask that this email be tabled as an objection to the construct of this helipad.

Regards

[REDACTED]

\*\*\*\*\*



\*\*\*\*\*

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine Helicopter  
**Date:** Tuesday, 10 March 2020 10:07:33 AM

---

Dear Minister [REDACTED].

Im writing to you regarding the Peregrine helicopter proposed amendment on the corner of Portrush Road and The Parade.

I cant believe the government would even consider such a dangerous and non conforming proposal.

The fact is the development is going to house at least what we had been told 600 plus people and the ugly building completely obscure the skyline overshadowing the corner section, the traffic congestion will an additional issue to what is occurring and currently Portrush Road is going to be widened the impact on residences and traffic will be enormous.

The local parking and visitor parking will spill into the adjacent streets and continue to have a detrimental impact on all the local residence etc.

Further to the above Peregrine now wants to cater for a helicopter pad (X2) and not just one pad but two. We have grave concerns as this is completely at odds what a residential neighbourhood is all about. Not only does Peregrine not told the complete truth but also has conveyed that they will take up the option in the future to upgrade and ramp up more than 10 operational helicopter days use per year. The fact there are two helicopter pads clearly demonstrates that there is more than what is currently said to community. The second helicopter pad was stated as an emergency pad however this is contradicted as there is a requirement in case of an emergency landing another location is required by CASA not adjacent to each other. Peregrine are fabricating statements to push this through.

The other issue I will raise is the fact that helicopters use Avgas, diesel or kerosene as a fuel. All these are carcinogenic, toxic, caustic and dangerously flammable.

They contain lead which has an negative impact on humans health. Not only we will be affected in our breathing but also the smell is disgusting the irritation to eyes and the body from fuel is severe to outright dangerous. The fuel also will affect buildings and noise will be clearly excessive with the buffering from the helicopter blades.

The take off and landing will be dangerous and extremely noisy again affecting all those in the vicinity area and not only people but also our fauna and flora peoples pets but also native animals etc. The fuel will cause corrosion on buildings eg roof, gutters etc. Further there will be damage to icon buildings around the close vicinity especially along the flight path which was namely in a north easterly direction. Whilst attempting in taking off and landing the helicopter will be restricted in the height elevation and therefore will be low within the suburb of Beulah Park until it elevates to its required height which will be using a lot of power and excessive fuel during these manoeuvres. The suburbs and its residents will be severely affected and the stench of fuel exhaust in the air and noise will be overwhelming. Residents will be inundated with these issues and their homes impacted negatively.

The fact that Peregrine proposes school ovals and residential parks as emergency areas for crash landings is completely insane.. especially when their specialist conveyed at the meeting when a crash landing is occurring someone will notify the school and they will sound the bell to get students to leave the oval. That statement is completely ludicrous as there wont have time to exit and what if the helicopter crashes into buildings. This also raises fuel spillage especially aviation fuel is completely different when it catches fire.

Also if a crash occurs or fuel spills their will absolute devastation at the intersection when their is traffic moving or standing still. Other buildings and occupiers.

Its completely crazy to expose people to such a deadly dangerous proposal.

Helicopters belong at the airport that's what its there for and to even consider Peregrine for clearly this selfish usage in a residential area is just absolute madness.

I clearly convey that I oppose this development amendment proposal and the government listen to the people this should never ever have been given any consideration. This is clearly a selfish private want only.

I say No way and Peregrine should use either Adelaide Airport or Parafield Airport for their use.

For any more info please contact me direct on [REDACTED]

Regards  
[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Helicopter  
**Date:** Tuesday, 10 March 2020 10:26:35 AM

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I would like to register my opposition to the proposed helipad .There is an airport for this purpose and this should not be thrust upon our community. [REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine"s Helipad  
**Date:** Tuesday, 10 March 2020 1:09:53 PM

---

Please register my objection to the helipad on the grounds of safety. noise pollution and fuel pollution

[REDACTED]  
[REDACTED], Marryatville SA

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[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Cc:** [REDACTED]  
**Subject:** Public feedback re Peregrine Helipad, Kensington  
**Date:** Tuesday, 10 March 2020 1:55:10 PM

---

Attention to the Minister for Planning

We write in relation to the proposed inclusion of a helipad at the development by Peregrine - corner of Portrush Road and The Parade in Kensington.

As residents of the suburb of Kensington for over fifteen years, we write to advise of our opposition to the proposed helipad in the strongest possible terms.

A helipad in this residential neighbourhood is inappropriate and unwarranted. It would take away from the quite enjoyment of both the immediate and near-by surrounds. The levels of danger, no matter how low, are completely unacceptable in this residential setting, not to mention the neighbouring schools, churches and convents that would be impacted.

Peregrine's proposal is not in the public interest. Any benefits apply to only a few, whilst the increased and unacceptable dangers, interruptions and inconvenience would affect many.

As persons affected by this proposed development, we hereby register our absolute opposition to the helipad and seek your consideration of our concerns in your assessment of the proposed helipad.

Regards

[REDACTED]



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

RECEIVED

11 MAR 2020

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

*Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.*



#### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

#### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

#### Do you have concerns regarding the proposed development?



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

NOTHING. THIS DEVELOPMENT IS NOT JUSTIFIED BY ANY ECONOMIC OR BUSINESS VALUE. ONLY TO SERVE MR SHAHIN'S EGO. AND IT COMPROMISES PUBLIC SAFETY. THE AIRPORT IS LESS THAN 30MIN AWAY!!!

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



Government of South Australia  
Department of Planning,  
Transport and Infrastructure



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

We had concerns about such a tall building altering the skyline and shade patterns on housing adjacent but it seems that the dept. of planning, transport and infrastructure have approved the first stage.  
However ~~the~~ our concerns re adding a helipad changes the whole project and should not be approved. (1) The local council is correct in its opposition.  
(2) Helicopters should not be flying and landing over residential areas (3) Sound level unacceptable. (4) Helicopters ~~have~~ are a risk and regularly crash. (5) Keep the helicopters at Adelaide Airport where they will be stored. It is zoned for aircraft and is not a residential area. (6) Norwood is a suburb to be preserved.



RECEIVED

11 MAR 2020



## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

As stated earlier, drive to airport from which you can ~~land~~ takeoff and land.

Build the development as <sup>approved</sup> planned without a Helipad.

Maintain the current zoning and do not allow such a Development under ~~the~~ <sup>any</sup> Planning laws which could be changed to allow Peregrine Corporation or similar to get special privileges

Other general comments:

This variation is beyond belief and would change the nature and outlook of Norwood. It would also pose a huge risk to people and businesses on the Norwood Parade and adjacent areas as well as to traffic on the already heavy traffic on Portrush Road.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

or via email to: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)



Government of South Australia

Department of Planning,  
Transport and Infrastructure

RECEIVED

11 MAR 2020

Consult  
Hall

Mar 18/2

1 pr  
5 p



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name ..... Address .....  
..... Email .....

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

Yes: Too noisy in a residential area.  
Too risky - an accident would be catastrophic  
Unnecessary - not essential for business on site



Government of South Australia  
Department of Planning,  
Transport and Infrastructure



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

*Stop that development.*

Other general comments:

*Appears to be a trend in this application.*

- 1. Was a low level development*
- 2. Rose to 5 ish stories.*
- 3. Now upto 7 stories*
- 4. Plus now a helicopter pad.*

*Development plan should hold people to the rules not except them by increments.*

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[Redacted]



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

**YES** Make this document available to the public

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

OF COURSE I HAVE.

- ① Safety concerns re. traffic, pedestrians, houses nearby, Clayton Church etc.
- ② Noise concerns - the right I have to enjoy my local community in peace & quiet.
- ③ the apparant ability of the shakins to ride roughshod over Council and community

with impunity  
ref. their houses & the  
road that connects  
them, which was built illegally.



Government of South Australia  
Department of Planning,  
Transport and Infrastructure



## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

The only solution is to say NO to the proposal both now, and in the future. I say this because the shakin's will not give up easily, and the government should develop the balls to stand up to them. I worry that this proposal is a fait accompli & will go ahead no matter what the local community wants -

Other general comments:

lots of red herrings are being fed to us.

e.g. 1. Peregrine employs more people in S.A. than any other company. NOT RELEVANT

2. The helicopter will bring more tourists to S.A. NO IT WON'T.

3. Only used 10 days a year, but Peregrine are not prepared to say how many flights per day.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

## TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name [REDACTED] Address [REDACTED]  
Telephone [REDACTED] Email [REDACTED]

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

YES make this document available to the public

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

NOISE Levels as they fly <sup>low</sup> over our suburb.

SAFETY When an accident occurs, and it will, people will say "who allowed this to happen?"

Are people who make the decisions prepared to take personal responsibility for their decisions?





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

STOP IT FROM  
HAPPENING

Say no this time and no the next time  
they apply. keep saying no.

Other general comments:

this entire development stinks. Norwood Council  
said NO so it went to John Rau + he said YES  
FIRST STINKER! Now they want to amend the plan,  
probably because an amendment is easier to get  
passed than to include in the original plan.  
this development is all about the Shahin family  
ego than it is about Sth. Australia.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



Government of South Australia

Department of Planning,  
Transport and Infrastructure

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel; contact@kra.org.au](mailto:contact@kra.org.au)  
**Subject:** Variation 2 - Peregrine Mixed Use Major Development  
**Date:** Tuesday, 10 March 2020 2:31:34 PM

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I would like to express my objection to the application for a helipad within the Peregrine Mixed Use Major Development.

These are the reasons:

- I have lived on [REDACTED], Kensington for more than 15 years. One of the major reasons I chose this charming suburb was because it is a quiet area. Use of a helipad will impact on this.
- The average value of a Kensington property is over \$700,000 - not the type of investment most would expect to come with a compromise on noise and safety.
- I have a child at a local school. This school was recently revealed as one of the proposed emergency landing sites. Loreto, Pembroke, Marryatville Primary and Marryatville High, are all schools where my close friends have enrolled their children. I don't know any parent who would endorse a major school facility as a suitable site for a helicopter engaging in an emergency landing.
- The use of helicopters for medical aid or bushfire relief is understood. I have been in a helicopter with a sick child and the need is obvious. Hearing a helicopter in use for a Superloop Adelaide 500 or other major event is at a higher altitude and not objectionable. However, the possibility of up to 160 take offs and landings at very close range to my rooftop is not something I can support.
- My child has pointed out that domestic animals in the area would be extremely distressed.
- Finally, I am not willing to endorse use of a helicopter at close range to my home for the purposes of recreational travel to a destination a little over one hour away.

Kensington features buildings dating back to the 1840s, built soon after South Australia was settled. As a qualified Interior Designer, I studied architecture and disagreed with the Peregrine redevelopment based on it's lack of sympathy to the character and context of the area through design, materials or scale. The addition of a helipad is an added insult. I therefore feel that there is no valid reason to support a helipad in a suburban area.

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Objection to Helipad  
**Date:** Tuesday, 10 March 2020 4:19:19 PM

---

To: Minister for Planning  
[REDACTED]

Dear Minister,

I wish to register my strong objection to the helipad at Norwood ,proposed by Peregrine, for the following reasons:

1 The compromising of the SAFETY of residents, pupils of the many schools in the vicinity, church goers opposite the Peregrine building, the users of the Parade ie the workers , the shoppers who come from far and wide , the tourists who love the village-like ambience of the Parade  
Safety is PARAMOUNT .

2 NOISE POLLUTION:the compromising of the well-being of the communities of Norwood and of the suburbs surrounding Norwood. Excessive noise is a factor in destroying peace of mind which is necessary for our mental health. One reason for living in a residential area and not an industrial area , is for one's health.

3 MORAL REASON. It seems wrong to ignore the use of the Adelaide Airport facility for helicopter transport for a convenience that would benefit a small group of well-heeled citizens to the detriment of a majority of citizens

The establishment of a helipad at Peregrine, Norwood would be an intrusion to far and would set a hideous precedent

[REDACTED]  
Marryatville  
[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** RE: Peregrine PER submission  
**Date:** Wednesday, 11 March 2020 8:21:31 AM  
**Attachments:** [Peregrine PER CW 2.pdf](#)

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My apologies, I inadvertently sent the wrong PDF version of our submission. Please receive the version attached in place of the one sent yesterday.

Thanking you

[REDACTED]

11 March 2020

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**From:** [REDACTED]  
**Sent:** Tuesday, 10 March 2020 8:21 PM  
**To:** [REDACTED]  
**Subject:** Peregrine PER submission

Please find attached a submission on the *Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility* from the Parish Mission Council of Clayton Wesley Uniting Church at Beulah Park.

Yours sincerely

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]

Beulah Park SA 5068



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

## TELL US WHAT YOU THINK

*Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission*

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- Oppose the development

### Do you have concerns regarding the proposed development?

*Please see attached statement*





# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

*Refuse the Variation 2!*

Other general comments:

*Please see attached statement*

[Redacted signature]

*8/3/2020*

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

[Redacted]  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[Redacted]



## **PEREGRINE MIXED USE MAJOR DEVELOPMENT**

### **VARIATION 2 HELICOPTER LANDING FACILITY**

#### **Submission to Public Environment Report for Variation 2 (PER)**

**Submitted by Parish Mission Council, Clayton Wesley Uniting Church, Portrush Road, Beulah Park**

##### **General Comment**

The Parish Mission Council is opposed to Variation 2 for the reasons expressed below. The addition of helicopters and their landing provisions to the scale and nature of the overall development is totally inappropriate for this site. Due to the high traffic density through this intersection, the unattractive visual image at this prominent road intersection will impact negatively on many people and three significant Heritage Listed buildings at the intersection.

##### **Specific Comments relating to Variation 2**

Our objections relate to the following:

1. Potential impact on heritage buildings of helicopter landings and departures due to air disturbance and vibration.
2. Impact of noise resulting from helicopter flights and landing/take-off in a residential and commercial area.
3. Risk posed to a residential locality by helicopter flights and landings.
4. Heritage impact

##### **1. Potential impact on heritage buildings**

There is no evidence in Peregrine's proposal that they have adequately addressed the potential impact of rotor blade downwash and rotor wake on nearby buildings. The 1856 and 1882 Clayton church buildings are the closest and tallest buildings near the development site. These are 19<sup>th</sup> century constructions, namely sandstone construction on blue-stone footings. Neither church building nor the spire of the 1882 building has any form of reinforcing to with stand vibration as would be needed for a current building. The risk of physical impact from air-borne vibrations caused by helicopters is very real, as is the risk of damage to the roofing of the 1882 building from downwash of air from helicopter landing and take-off.

While some analysis has been provided relating to gentle landing and take-offs from the proposed helipad, much greater forces will be generated if a pilot is trying to correct a problem once flying. For example, the tunnel effect of The Parade amplifies the effect of wind gusts. Correcting for such will require much greater acceleration of the aircraft and hence much greater forces generated and transmitted to the buildings.

##### **2. Noise impact**

The noise impact as given in the PER and at the information sessions held at Norwood Town Hall were inadequate and unconvincing. The readings presented were of levels recorded in two nearby streets. These showed 4 or 5 very sharp peaks in a 24 hour period, corresponding to a car door slamming, a motor cycle backfiring or such noises. In contrast to these transient noises, no adequate comment was made about the extended times local people would be subject to the high level noises emitted by helicopters during flight, landing and take-off and its impact. In addition, if there were any incidents which required corrective action, the noise levels generated would be even greater.

This is a residential and commercial area and includes around nine schools and creches. The application is for flights on 10 days a year but gives no limit to the number of flights allowed on each of those days. There is a high potential to expose local residents and schools to totally unbearable noise impacts.

Our Church Council would also stress that Norwood Community Creche is located at our property and our community engagement programme through The Spire Community operates at the site 5.5 days each week. Many of our clients are immigrants from war-ravaged parts of the Middle East and find such loud noise highly disturbing.

### **3. Risk of accidents**

At the Norwood public session it was claimed that the risk of accidents (or 'incidents' as they were called) would be low for individual flights. This claim was made by the representative of a company which was supposedly expert in the operation of all types of aircraft, including helicopters. Much was made of the fact that the company had achieved the ISO 9000:2015 rating.

However, according to the ISO website - <https://www.iso.org/standard/45481.html> - ISO 9000:2015 "describes the fundamental concepts and principles of quality management which are universally applicable to the following:

(followed by a generic list of potential users - organisations, customers, etc)". Thus ISO 9000:2015 specifies the terms and definitions that apply to all quality management and quality management system standards and as such does not rate technical expertise. Hence the claim of "low risk" may not be valid.

In addition, no assessment has been provided as to how 'incident' risk increases as the number of flights in a day rises. Much was made at the public session and in the PER that flights will be allowed on only 10 days per annum. The questions asked about how many flights per day were anticipated was not explicitly answered.

In section 2.1.2 Objectives and Need for the Proposal of the Public Environment Report is the statement: "The helicopter landing facility is seen as an integral component of the overall redevelopment of the site and will greatly assist Peregrine in the conduct of its business operations." However, Appendix J contains a summary signed off by Peter Vickery, Senior Project Manager Peregrine Corporation, which states: "3. The helipad is necessary to support a major event at The Bend Motorsport Park, which is an event of significant economic significance to South Australia."

Clearly, there will be at least one day per annum on which significant economic pressure will operate to maximise the number of flights. General consideration of the economic viability of the variation indicates that such pressure will apply more than that. Common sense indicates that an increased number of flights in any given day will result in an increased number of incidents and increased risk to people in the vicinity. Given all the interactions involved, the increase in risk is likely to be exponential rather than linear.

Our view is that the increased risk of serious impact within a residential and commercial area is not tolerable. How many other places in Australia or elsewhere (London, New York, for instance) permit helicopter landings on buildings within a residential area?

We also question the increased risk to our buildings (in particular, the church's spire which is about as high as the proposed development) due to the potentially high number of flights and landings/take-offs in close proximity to our site. This would be especially pertinent if the pilot were dealing with an 'incident' such as an unexpected strong gust of wind, for example.

#### 4. Heritage impact

The PER at 6.0 *Heritage Impact Assessment* states "These comparisons show that the proposed changes are not visible from the primary setting of the Clayton Wesley Church (when viewed from The Parade)." It is not the view **from** the church that is relevant but rather the view of both buildings from The Parade which is relevant. Clearly, the further away the viewer is, the greater will be the impact of the proposed helipad. The PER also mentions that the landing facility on top of the offices will be partially visible when looking north or south along Portrush Road. It concludes that the proposed variation will 'have no consequential impacts' on Heritage buildings.

The evidence and the discussion of how the development *per se* will visually affect Heritage buildings are very superficial. A building of this bulk and height will dramatically affect the familiar landscape at this intersection, which since the 1880s has been defined by three buildings and the spires of the two churches. It is non-sensical to state that the impact, plus or minus the helicopter landing facility, will 'have no consequence'. The large building will draw people's eyes and the contrasting addition on top will make it stand out even more.

Why has the lesson of St Peter's Cathedral not been learnt? The planning system allowed the box-like structure of a hotel to be built on the hilltop to the north of the cathedral thereby destroying the visual effect of the twin spires against the skyline. Here we are 50 years later living with that travesty and about to create another.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED], Beulah Park SA 5067

10 March 2020

[REDACTED]

10/3/2020

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#); [dunstan@parliament.sa.gov.au](mailto:dunstan@parliament.sa.gov.au); [bragg@parliament.sa.gov.au](mailto:bragg@parliament.sa.gov.au)  
**Subject:** Stop peregrines helipad  
**Date:** Tuesday, 10 March 2020 8:42:51 PM

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To whom it may concern

I am writing to you as the presiding officer representing the tenants of Nuova apartments [REDACTED] The Parade Norwood. We are voicing our serious concerns and objection related to the proposed construction of a helicopter landing facility on the roof of Peregrine redevelopment located at the south eastern corner of Portrush Road and The Parade Norwood.

It is with sheer disbelief that one can even contemplate considering a helipad on the above-mentioned redevelopment. This is a residential area consisting of private homes, apartments, schools, historic building let alone the busy Portrush and Parade Roads. The Parade is a beautiful precinct that enhances the Norwood area and hence one of the reasons why many of us purchased apartments in this state of the art building never realising at time of purchase that a helicopter landing facility would even have been on the agenda for a neighbouring development. This is a remedy for disaster and needs to be stopped immediately, there is no evidence of an overall evaluation of the risks associated with the proposed helicopter landing facility. Most incidents involving helicopter landing facilities occur near take-off and landing.

Placing residents and others in this area at such significantly high risk of potential harm is nothing short of madness. The Peregrine Corporation has produced a substantial Public Environmental Report which in the main deals with technical and planning requirements. Peregrine Corporation feels the helicopter landing pad is an integral part of the overall development if this were the case why did they not apply for same in the original redevelopment application. To think that the Helicopter landing facility will be restricted to use for 10 days per year is crazy. How many times will be it be used on those days and who will monitor the frequency of use? Once it is there it will be open slather. This is creating a precedent for a select group who seem to have the money and power to do what they want in South Australia.

The noise from the helicopters will be significant and has the potential to adversely impact on all residents living within the area, traffic traversing Portrush Rd and the Parade, those shopping and hoping for a nice peaceful dining experience. The rotor wake has the potential to cause significant vibration and have an adverse effect on surrounding buildings including 2 heritage listed iconic churches near the helicopter facility to name but a few.

In summary the impact of the proposed helicopter landing facility will be significant let alone the major risk factors associated with such a venture.

Surely Peregrine “visitors” can endure a trip to the Adelaide airport as would be the case for all other members of the community regardless of their profile. Why should we the residents near the proposed helicopter landing facility be placed at such risk and endure the noise and other inconvenience for the pleasure of a very select few people who bring no community or business benefit to this area.





# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name [REDACTED] Address [REDACTED]  
Telephone [REDACTED] Email [REDACTED]

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

Yes, a helipad located at the headquarters of Peregrine Corporations in Kensington, would put the public at risk. Given the significant built-up surrounding residential area and the high volume of traffic along, The Parade and Portrush Road.





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Peregrine could not build a helipad in Kensington, Adelaide, since it brings no benefits to the community, on the contrary, building a helipad causes anxiety and distress to the community. Since helicopter crashes are most common during landing and take-off, building one in Kensington would cause panic.

Other general comments: other disadvantages to the community include:

- Noise
- Pollution
- Putting students at risk of losing their lives, in case of an emergency landing.
- Putting the community at risk, considering Peregrine said, in case of an emergency, they are permitted to land in peoples backyards,
- Lower quality of life of the people living in the community.
- Lowering property value in Kensington, Norwood and surrounding areas.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



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Telephone [REDACTED] Email [REDACTED]

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Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

**From:** [REDACTED]  
**To:** [DPTI:scapreps](mailto:DPTI:scapreps)  
**Subject:** Peregrine - Heliport Application  
**Date:** Tuesday, 10 March 2020 9:25:10 AM  
**Attachments:** [Peregrine\\_Development.docx](#)

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My name is [REDACTED] of [REDACTED] Norwood and a near neighbour of the subject development.

I attach my objection to the development.

Yours faithfully,

[REDACTED]

[REDACTED]  
[REDACTED]  
Norwood SA 5067

Tuesday 10<sup>th</sup> March

The Secretary  
State Commission Assessment Panel  
GPO Box 1815  
ADELAIDE SA 5001

**Re: Peregrine Mixed-Use Major Development Variation 2**

Dear Sir/Madam,

I write to convey my **objection** to this Major Development.

I live with my elderly mother at [REDACTED], Norwood which is close to the above-mentioned development. I believe the noise from the helicopter(s) would be excessive considering the proximity to our address which is less than 150 metres away. The area around the development is mainly residential. There is also several schools in the vicinity including Mary McKillop College, St Ignatius Junior School and St Joseph's Primary. The noise from the helicopter would disrupt their quiet learning time and if in an emergency St Ignatius grounds were used what would happen with the students, how would they be affected.

I note that Peregrine have said that it would only be used approximately 10 times per year to take clients to their development at The Bend and that it would only be used in daylight hours or up till 10pm. 10pm in South Australia is dark even when we have daylight saving, so how can they say it will only be used in daylight hours? On those 10 times a year how many flights will there be on those days, it won't just be one to and one from The Bend. I presume most of their clients will fly into the Adelaide Airport so let them fly their helicopter directly from the airport to The Bend.

How is this going to be policed? Once the heliport is approved I envisage that it will be used more often.

The noise from the helicopter is going to be excessive. I have heard police helicopters going overhead and they are extremely noisy. The police and medical helicopters are assisting the community be it taking someone to hospital or looking for people. The Peregrine helicopter is only being used for their convenience and will not benefit the general public. I was on a bus trip a few weeks ago and a helicopter landed in a field a short distance away, the noise was so great we had to shout to make ourselves heard. I believe the noise of a helicopter flying over my address to the helipad will be excessive considering it will very low.

I am also concerned about the heritage listed buildings on the 3 remaining corners of Portrush Road and The Parade. The updraft from a helicopter landing and taking off will have dire consequences on these old buildings. Clayton-Wesley Uniting Church on the south-eastern corner of this intersection has a high steeple which will impact on the ability of the pilots to land safely. If damage occurs to any of these buildings will the owners be compensated? Probably not.

I am not in favour of a helipad to be erected on the top of their new development and believe it should be strongly REJECTED.

I do not wish to speak to my representation at the SCAP hearing.

Yours faithfully,

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel; dunstan@parliament.sa.gov.au](mailto:dunstan@parliament.sa.gov.au)  
**Cc:** [REDACTED]  
**Subject:** Peregrine Helipad  
**Date:** Wednesday, 11 March 2020 7:27:06 AM

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Dears Sirs / Madams,

On behalf of my wife and myself, I am writing to express my **extreme opposition** to the proposed helipad under planning consideration at the Peregrine Corp development.

As residents of [REDACTED] and multiple NPSP rate payers, we are already exasperated with recent developments that have placed an additional traffic and population burden on this section of our once peaceful, village-feel area. It's bad enough that the development is adding still more high density living in close proximity to other recent apartment constructions, in addition to once-large house blocks being turned into multiple smaller, ugly boxes. Adding to the existing noise and creating an air traffic disaster risk in a section of Norwood already suffering from too much activity is a gross case of putting development before people's best interests!

We're not against development, but progress should not just be measured by supposed economic growth and shouldn't come at the expense of peoples' comfort and well being!

Bear in mind, since we have lived in the area:

- St Iggys College has rapidly expanded
- Bath Apartments & Nuova Apartments have both been built
- Several blocks in Queen St have been subdivided and multiple dwellings built
- Traffic from the church has increased from weddings, funerals and school events (catering to higher student numbers) – church hours are hectic but school hours are outright chaos!
- An increasing number of vehicles from Burnside Hospital park in Queen St.
- We now see Parade shoppers parked in front of our house as far back as the south of William St!
- We still haven't had footpaths in Queen St fixed to carry the extra foot traffic – they're a disgrace and a health hazard (wife has broken a toe twice, neighbour has tripped and hurt back)
- The number of B-Doubles careening down Portrush Rd has increased.
- Additional noise has been added from an increasing number of flight paths from Adelaide airport air traffic being directed over Norwood airspace.
- Hoons seem to have found Queen St a convenient cut-through (and one has even moved in at the end of the street ... where are the cops when this green ute roars down the road every single day??)

The streets here no longer cope and are no longer safe with traffic during peak school hours banked up into the Parade. The so-called 2 hour parking limit is also a joke – we very rarely see any inspector there (who would be kept busy I assure you). All this is eroding the once safe and peaceful nature of our street.

We very strongly oppose any thought of a nearby helipad that will only add to the noise and traffic activity we already experience, not to mention the risk of air incidents so close to 2

schools. The development of more apartments in itself will bring more residents to an over-congested corner of town and the addition of helicopter movements will force us out, make no mistake.

A very strong NO please!!!

And PS ...if not already under consideration, there should be very serious thought to making alternative North-South streets in Norwood one-way and dropping limits to 40 due to the increase in traffic and especially to slow down speeding hoons. The area around William/Queen St is getting very dangerous to pedestrian traffic and we have real concerns for the well-being of children and parents around St Ignatius and St Josephs, as well as to drivers and pedestrians trying to cross The Parade from Queen during peak times.

Regards,

[REDACTED]

[REDACTED]

[REDACTED] | Norwood | SA 5067



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

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Name

Address

Email

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

Yes, a helipad located at the headquarters of Peregrine Corporations in Kensington, would put the public at risk. Given the significant built-up surrounding residential area and the high volume of traffic along, The Parade and Portrush Road.



Government of South Australia

Department of Planning,  
Transport and Infrastructure



## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

### What could be done to address your concerns?

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### Other general comments: Other disadvantages to the community include:

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- Pollution
- Putting students at risk of losing their lives, in case of an emergency landing.
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Government of South Australia  
Department of Planning,  
Transport and Infrastructure

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Opposition to the Peregrine Helipad  
**Date:** Wednesday, 11 March 2020 8:59:29 AM  
**Attachments:** [image12e7d3.PNG](#)

---

I would like to register my personal opposition to the proposed helipad.  
Thank you, regards [REDACTED]

[REDACTED]

-----  
[REDACTED], Adelaide, SA 5000

-----  
[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** PEREGRINE HELIPAD  
**Date:** Wednesday, 11 March 2020 9:35:16 AM

---

Dear Mr [REDACTED]

I am writing to you as a long term resident of Kensington to voice my strong objection to the proposed establishment of a helipad on the Peregrine Corporation building on the corner of Portrush Road and the Parade.

I do do for several reasons, including the increased noise factor in what is one of the oldest suburbs in Adelaide, but most all the potential danger involved in having helicopters land in the midst of a reasonably densely populated suburb. It is is my opinion this another attempt on the part of the Shahin family to exert pressure on governments by employing the philosophy of “money talks”. Not only has the Corporation succeeded in convincing the State Government (against the advice of the local council and the objections of the local residents) of the need to erect a new building in contravention of accepted heights in the area but now wishes to exert further pressure to have a helipad in place against what is clearly the common good.

Without in any way suggesting members of the Government may be unduly influenced I would like to remind you of your duty to represent those who elected you to Parliament, together with other members of the community, and not those of vested interest. There are good reasons why helipads, other than for hospitals, are centred away from residential areas. Those are of course obvious!

Yours sincerely,

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Strongly oppose the development @ Peregrine  
**Date:** Wednesday, 11 March 2020 9:58:12 AM

---

The Eastern suburbs is not an airport nor should it ever be.

I agreed with the devolvement of structure as it was put forward at the time of submission. How ever it doesn't take a genius to work out that this was their plan all along.

If this was originally put forward I would have opposed.

May be they could consider; Relocation of their purposed building to Export Park, Adelaide Airport or Parafield where there is existing air traffic, infrastructure and, emergency services to deal with any catastrophic incident. Effects would be minimal on the existing residents.

Just because the they have a s\*\*t load of money, doesn't excuse them for playing residents, Council and Government for fool's.... Or does it??

Resident of Beulah Park...

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine" helipad  
**Date:** Wednesday, 11 March 2020 11:12:32 AM

---

Hon. Minister [REDACTED]  
Department of Planning, Transport and Infrastructure

[REDACTED]  
I believe Peregrine is proposing helipad in residential area which I strongly oppose. [REDACTED] is taking Government and SA public for a ride due to their wealth which is questionable and ATO and AFP should investigate it. [REDACTED]

[REDACTED]

[REDACTED] Following facts alarming:

6 of the 7 listed 'Viable Options' during catastrophic engine failure are local school ovals. Up to 8 trips /day across 10days, Sound level of a front-end loader over houses between 7am and 10pm. Helicopters were involved in around 25% of all general aviation accidents even though they only account for 14% of the Australian VH-registered fleet. You will find all references.

So stop Peregrine's Helipad by all means. We have Airport for good reason. I want to remain anonymous but all residents will take the fight to the Parliament steps.

Resident in the suburb involved.

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Helipad objection  
**Date:** Wednesday, 11 March 2020 11:30:13 AM

---

Good morning

My partner and I would like to register our strong objection to the proposal of a helipad at Peregrine Corporations headquarters in Kensington. As residents of the area we object for a number of reasons;

- Peregrine has other options to "give guests a pleasurable experience" As I work at Adelaide airport, I am well aware of the distance from Kensington to the airport (approximately 12 km) and the time involved to travel between Peregrine headquarters and the airport, anything from 20 mins up to 45 mins depending on traffic. Peregrine could easily land at Adelaide airport and provide a (luxury) shuttle service to their headquarters in Kensington. Obviously Adelaide airport has all of the necessary facilities to accommodate helicopter movements, refuelling, dealing with emergencies etc. There is simply no need to have a helipad in a suburban area just to suit the desires of a successful corporation wishing to impress guests. Unless of course the Peregrine Corporation are seeking to avoid the costs involved with the use of the Adelaide airport facilities?

We also object for the following reasons;

- Noise, further degradation of local ambience
- Number of trips per day (up to 8)
- Allowed time for trips ( 7am to 10pm)
- Emergency landing options (school ovals!)

Yours sincerely

[REDACTED]  
[REDACTED] Kensington

## **PUBLIC CONSULTATION ON PROPOSED HELIPAD ON PERIGRINE BUILDING AT KENSINGTON.**

To [REDACTED] of S.A. Government's DPTI, Level 5, 50 Flinders St, Adelaide, 5000.

10.03.20.

[REDACTED] Kensington, 5068.

Our comments are based upon information gleaned at the community consultation meeting at the Norwood Parade Council Ballroom on Tues. 18.02.20 evening, and our total of > 60 years in the engineering field.

It is a general engineering axiom that any report concerning any contention must be based upon worst case scenarios. This basic tenant appears to be lacking in the Perigrine helipad reports. Equally unsettling is that too many variances to this basic tenant are biased in favour of Peregrine --- so, are the reports biased?

---

### **Noise-level diagrams for helicopters.**

The noise-levels diagram projected onto the ball-room's stage-curtain through most of the evening was completely irrelevant to helicopter landings and take-offs.

The diagram showed the isobaric sound pressures / noise levels for aircraft doing a fly-over of the landing site in the one direction ( NE --- SW ), rather than in all compass directions, where the isobaric sound-pressures would be circular. They are not correct for aircraft landings or take-offs (where the noisier take-offs would intensify those isobars more than the landing isobars). Worse, this diagram showed the fly-over noise-isobars for a smaller aircraft ( max. isobars of 90dBA ) rather than for a larger one --- its noise-isobar diagram ( max. isobars of 100dBA ) was effectively hidden from the audience in the SW corner of the ball-room in semi-darkness behind displays of the proposed new building.

Thus, they are certainly not relevant for helicopter landings and take-offs, where the isobars would be circular, and where the take-off isobars would be more intense than the landing isobars.

### **Noise-levels inside adjacent buildings.**

Whenever sound enters a space with hard surfaces, such as inside the walls of a stone church or hall, it reflects off those hard surfaces to set up standing waves / resonances inside that space. Here the resonances magnify the intensity of the initial sound-pressures to create much higher / much noisier sound-pressure zones. Such resonances are even more intensified when any of the space's resonant frequencies become synchronised with the resonant frequencies of a helicopter's rotating blades. For example, if Clayton Uniting church's chamber is 10 x 10 x 10metres (of course it isn't) and the velocity of sound is 340mps, its resonant sound frequencies would approx. 15, 30, 60, 120, etc Hz, which would be more amplified inside that space by nearby helicopter blades emitting similar frequencies in resonance during landings and take-offs, and so reinforcing / making louder those inside the space.

Thus, the 2 churches and their respective halls may be drowned in excessive, resonant noise during helicopter landings and take-offs, greater than that indicated by external noise-pressure diagrams alone. The same logic applies to any space in the vicinity, including nearby homes, shops, aged-care buildings and street-scapes, except that resonant noise-levels should be lower ( typical houses and shops have softer / more sound absorbent interiors ), and of higher frequencies ( resonant spaces are typically smaller ).

### **Local residents' amenity vs noise.**

Furthermore, the basic activities of homes and churches vs helicopters are anathema to each other --- one is quiet and contemplative and supportive while the other is noisy and exciting. Worse, both generally have most of their activities on the weekends, such as church services, families and students at home, shops busy, etc. Thus, coexistence or respect for each party's activities by the other is impossible in such close noise-proximities.

We put it to you that religious activities are historically more fundamental to life's needs of more people than the transient excitement of helicopter rides. Similarly, the local residents and businesses bought and rented their premises on the basis that their homes and businesses and mortgages and rents gave them a quality amenity. This will now be degraded by proposed helicopter activity.

It seems to us that the desirable amenity of the surrounding peaceful and natural homes, streetscapes and environment has markedly increased the value of such properties. If these values are degraded by helicopter activities, it would be reasonable for the residents to institute a class-action – the Valuer General could readily determine the owners' losses.

Therefore, any helicopter activities ( if approved ) must be subservient to both the church activities, particularly for prayer, services, weddings and funerals, when silence is mandatory, and to the normal residents' activities, especially on weekends.

### **Helicopter crash protection.**

It is a truism that in a helicopter emergency, a pilot will always jump into ultra-focussed panic mode, to land anywhere that seems safe, particularly as helicopters glide badly. Generally this means a road or an oval, certainly not a small helipad on the top of a building surrounded by other buildings and homes.

Furthermore, the proposed helipad's structural safety-factor of 2.5 is crazily low, certainly way below the impact loads of a falling helicopter. At 2.5, a falling helicopter would readily penetrate the upper floors of the building and ignite the floors below the roof, causing many deaths. The safety-factor should be at least 10!

We also put it to you that no roof manual or automatic fire-system of any capacity, could extinguish or even dampen, a crashed helicopter conflagration, let alone one that has penetrated down into the building's interior.

End.



6 March 2020



Name and address withheld

Minister for Planning

Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

**Re: Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility: Public Environment Report (PER)**

I am writing to you to express my vehement opposition to the Peregrine Corporation (henceforth referred to as Peregrine) proposal to add a helicopter landing facility (henceforth referred to as a helipad) atop their yet-to-be constructed new headquarter facility, located at 270 The Parade, Kensington. My opposition to the proposal is concerned with the noise associated with helicopters landing on and taking off from the helipad and the unacceptable disruption and annoyance this noise would cause to the local community; namely neighbouring residential dwellings, businesses, schools, places of worship, aged care facilities and so forth.

I have taken the opportunity to read through the State Planning Commission's *Guidelines for the preparation of a PER*, as well as Peregrine's recently released PER, including all the attached appendices, and wish to make comment on several aspects of the PER to substantiate my opposition to the helipad proposal.

**CRITICAL ASSESSMENT**

**Guideline 1 – Aviation Operations**

Within the correspondence contained on page 1 of **Appendix L** is a comment from DPTI Transport which suggests:

*A complaints procedure should be developed in accordance with the Fly Neighbourly Guide by the Helicopter Association International (HAI) as a reference see 7.4.2 of the guide.*

Peregrine's response to this suggestion from DPTI Transport, also on page 1 of **Appendix L**, was that:

*The Helicopter Association International (HAI) "Fly Neighbourly Guide" has no aviation legal standing or relevance to this application.*

This terse and uncooperative response from Peregrine suggests a lack of empathy, consideration and regard for the residential, business, school, worship and aged care facilities in the immediate and local vicinity of the proposed helipad and the unavoidable annoyance and disruption noise from the helipad will inevitably cause these stakeholders. Whilst the 'Fly Neighborly Guide' is a voluntary

noise abatement program, it is bizarre for Peregrine to suggest it has no relevance to their proposal. As the 'Fly Neighborly Guide' helpfully states:

*Helicopter operations are undeniably noisy, and this guide is concerned with a program designed to minimise the problem.*

Given the annoyance and disruption the proposed helipad will cause to the aforementioned stakeholders were it to be approved, one would imagine Peregrine would readily accept any reasonable advice given to it by a State Government agency to minimise annoyance and disruption, not simply dismiss the advice due to a lack of legal obligation.

#### **Guideline 2 – Neighbourhood Interface**

Within the correspondence contained on page 6 of **Appendix L** is a further comment from DPTI Transport which asks:

*Confirmation that the total number of trips (which includes take offs and/or landings for each trip event) that might occur during each day of the 10 days (i.e. how many take off and landings may occur on any given day?).*

Peregrine's response to this question from DPTI Transport, also on page 6 of **Appendix L**, was that:

*Peregrine cannot commit to how many landings / take-offs may occur on each of those (maximum) 10 days of use per year, there are limited numbers of the type of helicopters referenced for used [sic] in the PER.*

Peregrine have persistently attempted to suppress community and stakeholder concern over their proposed helipad and the associated noise by repeatedly stating within their application documentation, specifically pages 5 and 17 of the PER and page 4 of **Appendix D**, that:

*Helicopter activity will operate on no more than 10 days per year and only during daylight hours.*

By limiting flight days to no more than 10 days per year, not only does Peregrine avoid the need to obtain approval or licensing from the Environmental Protection Authority (EPA), the Civil Aviation Safety Authority (CASA) or any other regulatory body, but it also appears hopeful the seeming infrequency of these flights and the associated disruption and annoyance caused by the helicopter noise will seem insignificant or tolerable to the stakeholders in their immediate and local vicinity. However, perhaps even more important than the number of flight *days* per year is the number of *flights* to occur on each of the proposed 10 flight days.

A single landing and take-off on a given flight day is immensely different to multiple landings and take-offs on a given flight day when considering the annoyance and disruption the associated noise would cause stakeholders in the immediate and local vicinity. Without a commitment from Peregrine as to the number of planned landings and take-offs for each of their proposed flight days, it is impossible for DPTI to prepare an accurate and comprehensive assessment report of their proposal.

I attended the community information session at the Norwood Town Hall on the 18<sup>th</sup> of February 2020 to obtain further information on Peregrine's proposal. One of the attendees asked for clarification on how many landings and take-offs would occur on each of the proposed 10 flight days. The response given by the Peregrine representative was "the exact number will vary from day to

day". A follow-up question was asked as to what numbers would the landings and take-offs vary between, and the same representative provided another non-specific, non-committal answer.

Within the PER on page 10 of The Air Quality Professionals Pty Ltd report attached as **Appendix G** is the following excerpt addressing the number of flights anticipated for each of the proposed 10 flights days:

*Peregrine Corporation advised that the highest number of helicopter trips using the helipad in one day is eight trips, and the highest anticipated number of helicopter movements in one hour is three trips.*

The Air Quality Professionals report was dated 21 March 2019. Peregrine's Adequacy Check Feedback Applicant Response was dated 7 June 2019. The DPTI community information session took place on 18 February 2020. If Peregrine were able to advise Air Quality Professionals as to the highest number of helicopter trips on any one day at some time *prior* to March 2019, why did Peregrine not disclose this information to DPTI in the Adequacy Check Feedback Application Response they authored three months later? Why did Peregrine not disclose this information to attendees at the community information session some 11 months later?

On page 4 of **Appendix L** is a comment from the EPA which asks for additional information from Peregrine in relation to the supplied acoustic assessment. The EPA requested that:

*...the proponent needs to predict through modelling the noise levels at potential noise-affected premises along each of the possible landing and take-off flight paths (up to cruising height) for each type of helicopter proposed to be used when operating under worst case conditions. Such information should be presented in map format showing noise contours at ground level and the worst-case frequency and duration that such noise would occur on any one day when the helicopter landing facility may be in use.*

While initially declining to comply with the EPA's request, Peregrine subsequently provided the additional information which is included within **Appendix M** of the PER. The contours of maximum noise from landing and take-off of each of the three helicopters proposed to service Peregrine shows a map of the premises affected by the helicopter noise, as well as to what degree they are affected in terms of decibel (dB) level. Neither the maps nor assessment document authored by Sonos Pty Ltd specify the type or number of premises affected at the various decibel levels, however I have undertaken an audit from the maps provided and have established the below figures:

#### **Bell 206 Helicopter**

- **95dB(A)**
  - Peregrine Headquarters only
  
- **90dB(A)**
  - 1 x school (St Ignatius' College Junior School)
  - 2 x businesses (Tatarelli Consulting and Goodies Op Shop)
  - 23 x residential dwellings
  
- **85dB(A)**
  - 1 x school (St Ignatius' College Junior School)
  - 1 x convent (St Joseph's Convent)
  - 2 x places of worship (St Ignatius' Catholic Church and Clayton Wesley Uniting Church)

- 4 x businesses (Motorcycling South Australia, Duncan Sande & Associates, Electric Environs and Community Business Bureau)
  - 4 to 6 residential dwellings currently under construction at 247 The Parade, Beulah Park
  - 65 residential dwellings
- **80dB(A)**
    - Uncounted due to incomplete contour map

#### **EC 130 Helicopter**

- **90dB(A)**
  - 1 x residential dwelling
- **85dB(A)**
  - 1 x place of worship (Clayton Wesley Uniting Church)
  - 1 x school (St Ignatius' College Junior School)
  - 2 x unoccupied business tenancies at the Nuovo Apartments, 254 The Parade, Norwood
  - 8 x businesses (Motorcycling South Australia, Duncan Sande & Associates, Tatarelli Consulting, Goodies Op Shop, Electric Environs, Couture Love and Madness, Marie's Ironing Service and Topdeck Travel)
  - 110 residential dwellings
- **80dB(A)**
  - Uncounted due to incomplete contour map

#### **AW109/H109 Helicopter**

- **100dB(A)**
  - 4 x residential dwellings
- **95dB(A)**
  - 1 x place of worship (Clayton Wesley Uniting Church)
  - 1 x convent (St Joseph's Convent)
  - 1 x school (St Ignatius' College Junior School)
  - 7 x businesses (Motorcycling South Australia, Duncan Sande & Associates, Tatarelli Consulting, Goodies Op Shop, Electric Environs, Marie's Ironing Service and Topdeck Travel)
  - 71 x residential dwellings
- **90dB(A)**
  - 1 x convent (St Joseph's Convent)
  - 2 x places of worship (Clayton Wesley Uniting Church and St Ignatius' Catholic Church)
  - 1 x aged care facilities (Kensington Aged Care)
  - 2 x schools (St Ignatius' College Junior School and St Joseph's Memorial School)
  - 2 x unoccupied business tenancies at the Nuovo Apartments, 254 The Parade, Norwood
  - 5 x businesses (Browse In & Save, Allergy SA, Motorcycling South Australia, Community Business Bureau, Couture Love and Madness)
  - 126 x residential dwellings
- **85dB(A)**
  - Uncounted due to incomplete contour map

Based on my audit it is apparent Peregrine's proposal for a helipad would have a maximum acoustic impact of:

- Between 85dB(A) and 90dB(A) on at least 88 residential dwellings in cases where a Bell 206 was in operation,
- Between 85dB(A) and 90dB(A) on at least 111 residential dwellings in cases where an EC 130 was in operation, and
- Between 90dB(A) and 100dB(A) on at least 201 residential dwellings in cases where a AW109/H109 was in operation

It is important to note these figures do *not* include the number of dwellings affected by 80dB(A) of noise from the Bell 206, 80dB(A) of noise from the EC 130 and 85dB(A) of noise from the AW109/H109 as the maps provided by Sonos did not include complete contour circles of these dB(A) bands and as such went uncounted. It is also important to note the wide zoom level and low resolution of the contour maps made it difficult to obtain an accurate count of the number and type of affected premises. If Sonos were to provide complete contour maps with a higher resolution, the number of residential dwellings affected by these dB(A) bands summarised above would increase by several hundred.

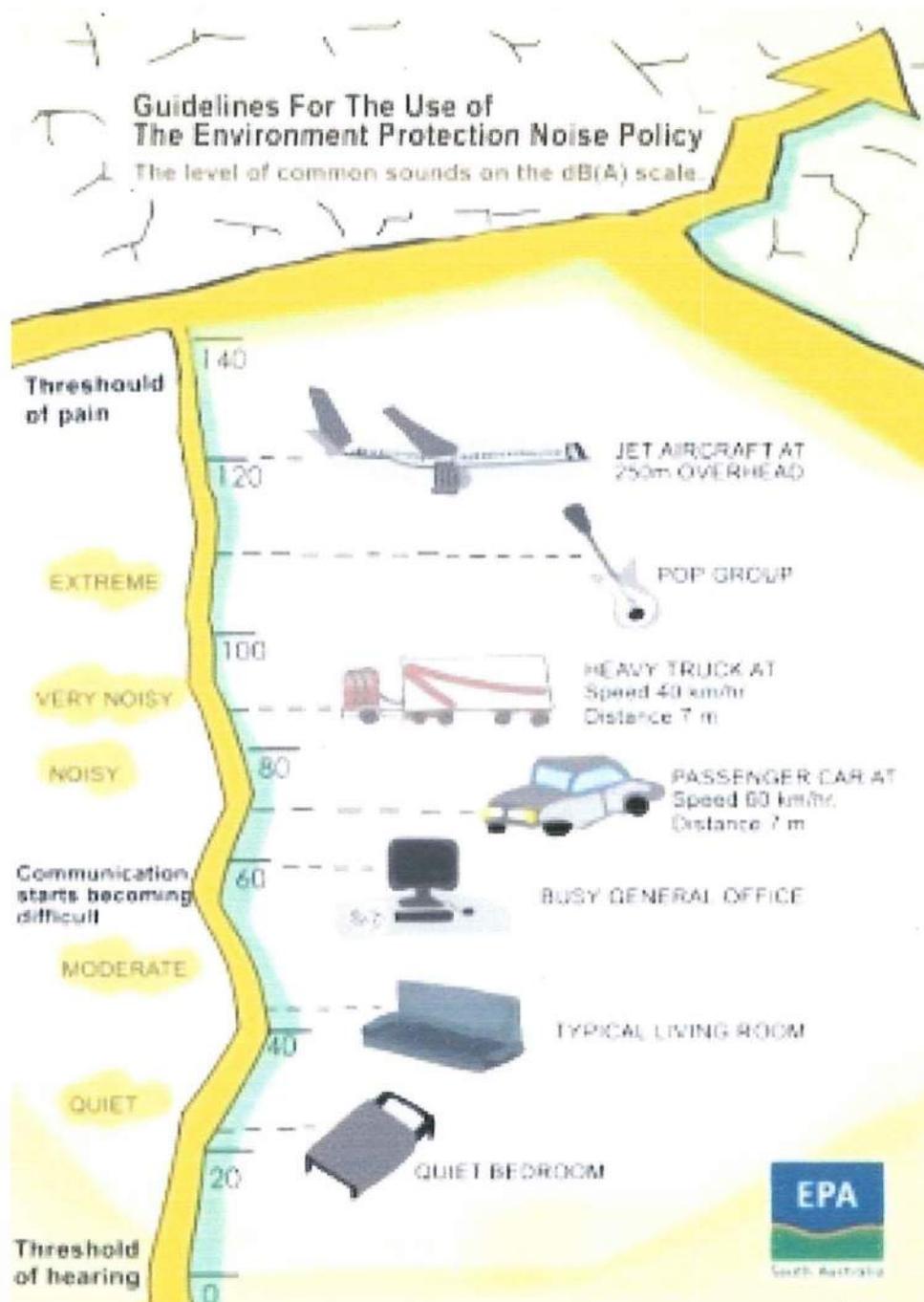
Additional information lacking within the Sonos acoustic assessment is the number of premises affected by helicopter noise levels below 80dB(A). Airservices Australia (n.d.)<sup>1</sup> advises "in the case of aircraft noise the acoustic energy can pass through 500m to 10km (or more) of air to reach local communities". Based upon this information Peregrine's proposed helipad is likely to have an acoustic impact on potentially thousands of residential dwellings, not to mention businesses, schools, places of worship and aged care facilities.

To put these dB(A) bands into perspective, noise produced at a dB(A) level of between 80dB(A) to 100dB(A) is classed as being *noisy* to *very noisy*, is above the level at which communication starts to become difficult and is likened to the noise emitted from a heavy truck travelling at 40km/h from a distance of seven metres (EPA 2019)<sup>2</sup>. The image on the following page provides a graphical representation of this explanation.

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<sup>1</sup> Airservices Australia n.d., *Fundamentals of sound*, Airservices Australia, viewed 31 January, <<http://www.airservicesaustralia.com/aircraftnoise/factsheets/>>.

<sup>2</sup> Environment Protection Authority 2019, *Noise*, Environment Protection Authority, Government of South Australia, viewed 31 January 2020, <<https://www.epa.sa.gov.au/community/noise>>.

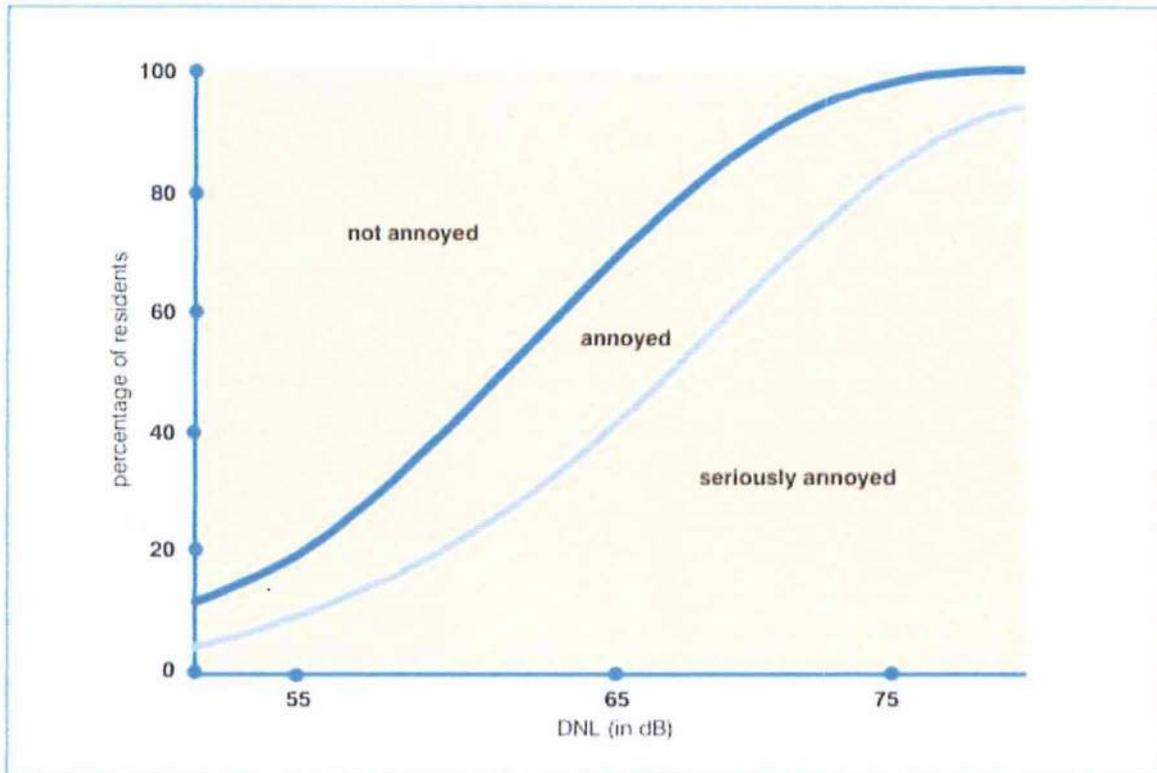


Guidelines for the use of the Environmental Protection Noise Policy (EPA 2019)<sup>3</sup>

The Fly Neighborly Guide (Helicopter Association International n.d.)<sup>4</sup> referred to by DPTI in the PER contains further information concerning helicopter noise. The graph on the following page, extracted from the guide, shows the relationship between the amount of noise people are exposed to and how annoyed they are likely to get.

<sup>3</sup> Environment Protection Authority 2019, *Noise*, Environment Protection Authority, Government of South Australia, viewed 31 January 2020, <<https://www.epa.sa.gov.au/community/noise>>.

<sup>4</sup> Helicopter Association International n.d., *Fly neighborly guide*, HAI Fly Neighborly Committee, viewed 31 January 2020, <<https://www.aia.org.nz/AIRCARE/AIRCARE+Resources/Resources+for+NZAAA.html>>.



Relationship Between Noise Exposure and Annoyance (Helicopter Association International n.d.)<sup>5</sup>

The graph shows noise above 75dB causes *serious annoyance to over 80% of residents*. Noise annoyance is defined as “a feeling of resentment, displeasure, discomfort, dissatisfaction or offence caused by noise interference” (Department of Health 2018)<sup>6</sup>. Given the lowest noise level produced by all three of the helicopters proposed to be used by Peregrine is 80dB(A), this graph suggests that *hundreds of residents* are going to be *seriously annoyed* each and every time a helicopter lands and takes off from Peregrine’s proposed helipad.

On pages 9 and 10 of **Appendix E** of the PER, Sonus have attempted to downplay the effect helicopter noise from the proposed helipad will have on residential dwellings, businesses, schools, etc. in the immediate and local vicinity by stating:

*The impact of a noise source on other land uses, as well as wildlife and domestic animals, is often determined by reference to other noise in the environment. To provide context to the predicted helicopter noise, a comparison has been made to the maximum noise levels (L<sub>Amax</sub>) recorded in Bowen Street adjacent to the closest residences...the figure shows that predicted maximum levels are regularly exceeded in the existing noise environment...the noise on 10 days per year will be less than the noise measured on several occasions in a single week.*

<sup>5</sup> Helicopter Association International n.d., *Fly neighborly guide*, HAI Fly Neighborly Committee, viewed 31 January 2020, <<https://www.aia.org.nz/AIRCARE/AIRCARE+Resources/Resources+for+NZAAA.html>>.

<sup>6</sup> Department of Health 2018, *The health effects of environmental noise*, Australian Government, viewed 24 February 2020, <<https://www1.health.gov.au/internet/main/publishing.nsf/Content/health-pubhlth-publicat-environ.htm>>.

What the Sonus report fails to factor into its assessment is the psychological concept of *habituation*. Burton, Weston and Kowalski (2009, p.212)<sup>7</sup> state:

*Habituation refers to the decreasing strength of a reflex response after repeated presentations of the stimulus. For instance, the loud clang of an old radiator may initially be startling, but repeated clangs produce a steadily decreasing response, until we barely even notice them anymore.*

Humans become habituated to road traffic noise from the day they are born because it can be heard from almost anywhere, anytime. Because of this habituation humans quickly and easily learn to block out every day traffic noise until, as Burton, Weston and Kowalski (2009, p.212)<sup>8</sup> stated, “we barely even notice [it] anymore”. Helicopters on the other hand are rarely heard by the general population not living near an airport, meaning most humans are therefore not habituated to:

*The external sound produced by a helicopter [which] is made up of acoustical sources from the main rotor, the anti-torque system (tail rotor), the engine(s), and drive systems...The most noticeable acoustical characteristic of all helicopters is the modulation of sound by the relatively slow-turning main rotor. This modulation attracts attention, much as a flashing light is more conspicuous than a steady one. The resulting modulated sound can become impulsive in character and is referred to as BVI (Blade Vortex Interaction Noise), blade slap, or more generally as impulsive noise. In some flight conditions, the main rotor noise can become quite impulsive in character...which can increase the annoyance of the helicopter to people on the ground (Helicopter Association International n.d.)<sup>9</sup>.*

Sonus’ testing may show helicopter noise at Peregrine’s proposed helipad would not be much louder than existing traffic noise, but the helicopter noise would certainly be more noticeable i.e. *more annoying* to those living and working nearby due to the lack of human habituation to helicopter noise. To imply or assert otherwise would not only be deceitful, it would be just plain wrong.

Warranting more concern than just the annoyance caused by helicopter noise is the associated negative health effects. A recent review into the potential health risks of environmental noise concluded “there is sufficient evidence to suggest that noise affects health” (Department of Health 2018)<sup>10</sup>. Among the health issues aircraft noise was suggested as having a negative impact upon were both sleep disturbance and cardiovascular disease. As a result of the review several key recommendations were made, two of which were “Recommendation 1: Recognise that environmental noise is a health risk” and “Recommendation 2: Promote measures to reduce environmental noise and associated health impacts” (Department of Health 2018)<sup>11</sup>.

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<sup>7</sup> Burton, L, Weston, D & Kowalski, R 2009, *Psychology*, 2nd edn, John Wiley & Sons Australia Ltd, Queensland.

<sup>8</sup> Burton, L, Weston, D & Kowalski, R 2009, *Psychology*, 2nd edn, John Wiley & Sons Australia Ltd, Queensland.

<sup>9</sup> Helicopter Association International n.d., *Fly neighborly guide*, HAI Fly Neighborly Committee, viewed 31 January 2020, <<https://www.aia.org.nz/AIRCARE/AIRCARE+Resources/Resources+for+NZAAA.html>>.

<sup>10</sup> Department of Health 2018, *The health effects of environmental noise*, Australian Government, viewed 24 February 2020, <<https://www1.health.gov.au/internet/main/publishing.nsf/Content/health-publhlth-publicat-environ.htm>>.

<sup>11</sup> Department of Health 2018, *The health effects of environmental noise*, Australian Government, viewed 24 February 2020, <<https://www1.health.gov.au/internet/main/publishing.nsf/Content/health-publhlth-publicat-environ.htm>>.

The recommendations made by the Department of Health link in with the Norwood, Payneham and St Peters Development Plan from DPTI (2019)<sup>12</sup>, which specifies the following relevant objectives and principles of development control (PDC):

*Objective 27: Protect community health and amenity from the adverse impacts of development...*

*Objective 31: A compatible arrangement between land uses and the transport system which will: (a) ensure minimal noise...*

*PDC 80: Development should not detrimentally affect the amenity of the locality or cause unreasonable interference through any of the following...(b) noise...*

*PDC 81: Residential development adjacent to a non-residential land use or zone or within a non-residential zone should be located, designed and sited in a manner which: (a) protects residents from any adverse effects of non-residential activities...*

The evidence thus far shows Peregrine's proposed helipad does not comply with any of the above planning objectives or PDCs. Hundreds, likely thousands of residential dwellings in the immediate and local vicinity of Peregrine HQ would be negatively impacted by the noise generated from helicopters using their proposed helipad through loss of amenity and annoyance. This is in addition to the correlation between aircraft noise and sleep disturbance and cardiovascular disease found by the Department of Health. The only way to ensure Peregrine's proposed helipad protects community amenity, ensures minimal noise, does not cause unreasonable interference through noise and protects residents from the adverse effects of non-residential activities is to ensure the proposal does not proceed in any form.

### **ADDITIONAL ISSUE ASSESSMENT**

Peregrine assert on page 7 of the PER that the proposed helipad is needed for quick, accessible transport for overseas and interstate business guests to and from the Tailem Bend Motorsport Park Complex. Given that Adelaide is home to two metropolitan airports facilitating helicopter transport, I question why Peregrine simply cannot chauffeur by car its interstate and overseas business guests from its headquarters at Kensington to one of these two airports and use helicopters to complete the journey to and from Tailem Bend?

Whilst not specifically stated anywhere within the PER, one could reasonably presume three of the 10 flight days Peregrine have proposed to use their helipad would be for The Bend OTR 500, part of the Virgin Australia Supercars Championship, this year occurring between 18 to 20 September 2020 (The Bend Motorsport Park 2020)<sup>13</sup>. I have used Google Maps (Google 2020)<sup>14</sup> to determine the approximate return trip travel time for road transport between Peregrine's headquarters at 270 The Parade, Kensington and both Adelaide and Parafield Airports at various times of the day for these

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<sup>12</sup> Department of Transport, Planning and Infrastructure 2019, *Development plan Norwood Payneham and St Peters (City)*, Department of Transport, Planning and Infrastructure, viewed 6 March 2020, <[https://www.npsp.sa.gov.au/planning\\_and\\_development/development\\_strategy\\_and\\_policy/development\\_plan\\_policy](https://www.npsp.sa.gov.au/planning_and_development/development_strategy_and_policy/development_plan_policy)>.

<sup>13</sup> The Bend Motorsport Park 2020, *Events*, The Bend Motorsport Park, viewed 5 March 2020 <[https://www.thebend.com.au/events?page=2&views\\_tabbed\\_display\\_override\\_request\\_uri=https%253A%252F%252Fwww.thebend.com.au%252Fevents%253Fpage%253D1](https://www.thebend.com.au/events?page=2&views_tabbed_display_override_request_uri=https%253A%252F%252Fwww.thebend.com.au%252Fevents%253Fpage%253D1)>.

<sup>14</sup> Google 2020, *Google maps*, Google, viewed 5 March 2020, <<https://www.google.com/maps/>>.

dates. The full dataset is attached to the end of this submission marked **Appendix A** however the results are summarised below:

- The fastest median travel time from Peregrine HQ to Adelaide Airport is estimated to be 14 minutes, whilst the slowest median travel time is estimated to be 40 minutes.
- The fastest median travel time from Peregrine HQ to Parafield Airport is estimated to be 22 minutes, whilst the slowest median travel time is estimated to be 45 minutes.
- The fastest median travel time from Adelaide Airport to Peregrine HQ is estimated to be 16 minutes, whilst the slowest median travel time is estimated to be 45 minutes.
- The fastest median travel time from Parafield Airport to Peregrine HQ is estimated to be 24 minutes, whilst the slowest median travel time is estimated to be 45 minutes.

The fact Peregrine could have its interstate and overseas guests to an airport from its headquarters via car in as little as 14 minutes, and in as much as 45 minutes, suggests to me there are minor time gains for Peregrine's executive should their proposed helipad be approved however there would be large losses for hundreds, if not thousands of nearby residents in terms of lost amenity from helicopter noise and risks to the safety of these same residents, as well as employees of and visitors to the Norwood / Kensington precinct, including school children, were an aircraft attempting to use Peregrine's proposed helipad suffer an air emergency.

A smaller, but by no means less important group of stakeholders whom will be negatively affected by Peregrine's proposed helipad are shift workers. Peregrine propose to only use their helipad between 7am and 10pm on each of the 10 proposed flight days. These timings may not impact on the sleep on the vast majority of the people who reside in the Norwood / Kensington area, however what about shift workers?

There is a Metropolitan Fire Service (MFS) fire station located 742m east as the crow flies (Google 2020)<sup>15</sup> of Peregrine's headquarters, and there is a South Australia Police (SAPOL) police station located 906m west as the crow flies (Google 2020)<sup>16</sup> of Peregrine's headquarters. One could assume at least some of the firefighters and police officers working at these locations live in the vicinity, work shifts and therefore would often sleep during the day, as might doctors, nurses, cleaners, garbage collectors, service station attendants, labourers etc. Why should the sleep of these workers be disrupted because Peregrine, a private corporation, wishes to ferry its business associates via helicopter for the sole financial gain of Peregrine?

Despite Peregrine's claims to the contrary, the proposed helipad for their headquarter building is very much intended to service the business and personal desires of the Peregrine executive. On page 33 of the PER, Peregrine asserts follow-on economic and employment benefits to the State will be impacted should their helipad proposal not proceed, however page 2 of **Appendix K** (Evaluation of Economic and Employment Impacts Prepared by Fyfe) states:

*The proposed helicopter landing facility is ancillary to and integrated with the proposed mixed use development and consequently, is not expected in its own right to have an economic or employment impact on the Norwood and Kensington Precincts.*

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<sup>15</sup> Google 2020, *Google maps*, Google, viewed 5 March 2020, <<https://www.google.com/maps/>>.

<sup>16</sup> Google 2020, *Google maps*, Google, viewed 5 March 2020, <<https://www.google.com/maps/>>.

Whilst I am cognisant DPTI can only assess Peregrine's proposal against what 'is' and not what 'might be', I feel its pertinent to raise the realistic concern that, should Peregrine's proposal be approved, one could assume Peregrine would at some point in the future seek to increase the number of flight days per year above 10. Given the amount of time, money and effort Peregrine has invested in researching, planning, developing and championing its proposal, not to mention the build cost should their proposal be approved, it is reasonable to assume Peregrine, a profit-making organisation, would want to maximise its return on investment by using its proposed helipad for more than just 2.74% of the year.

It is my understanding Peregrine would need approval or licensing from the EPA, CASA or another regulatory body to operate its proposed helipad more than 10 days per year, however one could surmise such approval or licensing would be much easier to obtain once the helipad is already in existence and approval to operate for 10 days a year already granted. Easier still would this approval or licensing be to obtain given Peregrine have refused to establish a complaints handling procedure if their proposed helipad is approved by DPTI. Without such a complaints procedure regulatory bodies such as the EPA and CASA would have no accurate or comprehensive means of assessing the impact of the helipad and its established use on the local community in any potential future application by Peregrine for increased flight days.

The last issue I wish to comment on is the consequences Peregrine foreshadows for its business should their proposed helipad not proceed. Peregrine asserts in the PER its business efficiency, continued growth and competitive advantage would all be impacted, however it provided no explanation or evidence to substantiate their claims. At the DPTI community information session I attended, one of the Peregrine representatives was asked how many of their interstate competitors had a helipad atop their headquarter office. The response given was "none that we know of". Given Peregrine's dominance of the South Australian service station and convenience market, the diversification of its businesses through convenience, tobacco, gifts, baked goods, motorsport, petroleum, and property (Peregrine Corporation 2020)<sup>17</sup>, its expansion into Victoria and New South Wales (Hargreaves 2019)<sup>18</sup> and its ranking at 11 out of the top 500 Australian private companies by revenue in 2019 (Bailey 2019)<sup>19</sup>, I find it extremely difficult to accept Peregrine will suffer a material disadvantage should their helipad proposal not proceed.

## **SUMMARY**

Despite having read Peregrine's PER in its entirety, having attended the community information session and having kept abreast of relevant news articles in the local Messenger, my opinion that the proposed helipad will benefit no one other than Peregrine while causing significant annoyance and detriment to the health and amenity of the local community is unchanged and, in fact, has become more entrenched.

Peregrine's refusal to establish a complaints procedure in accordance with the 'Fly Neighborly Guide' is evidence of an organisation which, despite the claims of its representatives at the community information session, has little regard for the community within which it operates or the annoyance

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<sup>17</sup> Peregrine Corporation 2020, *Our business*, Peregrine Corporation, viewed 5 March 2020, <<https://www.peregrine.com.au/our-business/>>.

<sup>18</sup> Hargreaves, JM 2019, 'On the run expanding in VIC and into NSW', *Convenience and Impulse Retailing*, 29 October, viewed 5 March 2020, <<https://www.c-store.com.au/2019/10/29/on-the-run-expanding-in-vic-and-nsw/>>.

<sup>19</sup> Bailey, M 2019, 'Australia's top 500 private companies revealed', *Australian Financial Review*, 5 September, viewed 5 March 2020 <<https://www.afr.com/policy/economy/australia-s-top-500-private-companies-revealed-20190902-p52n8c>>.

its proposed helipad operations will cause. This is further evidenced by Peregrine's claimed inability to commit to DPTI via the Adequacy Check Feedback Application Response, and to the attendees at the community information session, how many landings / take-offs may occur on each of the proposed 10 days of use per year, yet were somehow able to disclose to Air Quality Professionals months beforehand that the highest number of helicopter trips using the helipad in one day would be eight trips, and the highest anticipated number of helicopter movements in one hour would be three trips.

The number of residential dwellings which will be subjected to noise from helicopters servicing Peregrine's proposed helipad, based partly upon contour maps provided by Sonus, would number in the thousands, not merely in single or even double digits. The level of noise generated by the helicopters would be very noisy and would cause serious annoyance to over 80% of residents where the decibel level was 80dB(A) or above.

Despite testing by Sonus showing helicopter noise at Peregrine's proposed helipad would not be much louder than existing traffic noise, the psychological concept of habituation means the helicopter noise would be more noticeable i.e. more annoying to those living and working nearby. This increased annoyance is in addition to aircraft noise contributing to ill-health via sleep disturbance and cardiovascular disease.

Shift workers living in the vicinity of Peregrine's helipad, potentially comprising of both police officers and fire fighters employed at the nearby police and fire stations, as well as numerous others who may be doctors, nurses, etc. would be negatively and unfairly effected by the helicopter noise while they were sleeping during the proposed daylight hours of operation between 7am and 10pm.

The availability of two metropolitan airports within close proximity to Peregrine's headquarters further invalidates Peregrine's alleged business need for a helipad, as does the fact the proposed helipad will benefit only Peregrine and will produce no flow on economic or employment benefits to the local community or state. The potential for Peregrine, should their proposal proceed, to later seek regulatory approval for use of the proposed helipad in excess of the proposed 10 days annually is yet another of the multitude of reasons why Peregrine's proposal should not proceed.

# **APPENDIX A**

**GOOGLE MAPS AIRPORT TRAVEL TIMES**

DATE	DEPARTURE TIME	TRAVEL TIME (HQ to Airport)		TRAVEL TIME (HQ to Airport)	
		FASTEST (mins)	SLOWEST (mins)	FASTEST (mins)	SLOWEST (mins)
		ADELAIDE AIRPORT		PARAFIELD AIRPORT	
<b>18/09/2020</b>	7:00 AM	14	30	22	40
	8:00 AM	16	40	22	45
	9:00 AM	16	40	22	45
	10:00 AM	16	40	22	40
	11:00 AM	16	40	22	45
	12:00 PM	16	45	22	45
	1:00 PM	16	45	22	45
	2:00 PM	16	45	22	45
	3:00 PM	16	45	22	50
	4:00 PM	16	45	22	50
	5:00 PM	16	45	22	45
	6:00 PM	16	40	22	45
	7:00 PM	16	35	22	40
	8:00 PM	16	35	22	40
	9:00 PM	16	35	22	40
	10:00 PM	14	30	22	35
	Median Time	16	40	22	45
<b>19/09/2020</b>	7:00 AM	14	22	20	30
	8:00 AM	14	28	20	35
	9:00 AM	14	35	22	35
	10:00 AM	16	35	22	40
	11:00 AM	16	40	22	45
	12:00 PM	16	40	22	45
	1:00 PM	16	40	22	45
	2:00 PM	16	40	22	45
	3:00 PM	16	40	22	45
	4:00 PM	14	35	22	40
	5:00 PM	14	35	22	40
	6:00 PM	14	35	22	40
	7:00 PM	14	35	22	40
	8:00 PM	14	35	22	40
	9:00 PM	14	30	22	35
	10:00 PM	14	28	22	35
	Median Time	14	35	22	40
<b>20/09/2020</b>	7:00 AM	14	22	20	26
	8:00 AM	14	24	20	30
	9:00 AM	14	28	20	35
	10:00 AM	14	30	22	35
	11:00 AM	16	35	22	40
	12:00 PM	16	40	22	45
	1:00 PM	16	40	22	45
	2:00 PM	16	40	22	40
	3:00 PM	14	35	22	40
	4:00 PM	14	35	22	40
	5:00 PM	14	35	22	40
	6:00 PM	14	35	22	35
	7:00 PM	14	30	22	35
	8:00 PM	14	28	22	35
	9:00 PM	14	28	22	35
	10:00 PM	14	26	22	35
	Median Time	14	33	22	35

DATE	DEPARTURE TIME	TRAVEL TIME (Airport to HQ)		TRAVEL TIME (Airport to HQ)	
		FASTEST (mins)	SLOWEST (mins)	FASTEST (mins)	SLOWEST (mins)
		ADELAIDE AIRPORT		PARAFIELD AIRPORT	
<b>18/09/2020</b>	7:00 AM	16	35	24	40
	8:00 AM	18	45	26	50
	9:00 AM	18	45	24	45
	10:00 AM	18	40	24	45
	11:00 AM	18	45	24	50
	12:00 PM	18	45	24	50
	1:00 PM	18	45	24	45
	2:00 PM	18	45	24	50
	3:00 PM	18	50	24	50
	4:00 PM	18	50	24	50
	5:00 PM	18	50	24	50
	6:00 PM	18	45	24	45
	7:00 PM	16	40	24	45
	8:00 PM	16	35	24	40
	9:00 PM	16	35	24	40
	10:00 PM	16	35	24	35
		Median Time	18	45	24
<b>19/09/2020</b>	7:00 AM	16	24	24	35
	8:00 AM	16	28	24	35
	9:00 AM	16	35	24	40
	10:00 AM	18	35	24	45
	11:00 AM	18	40	24	50
	12:00 PM	18	40	24	50
	1:00 PM	18	40	24	45
	2:00 PM	18	40	24	45
	3:00 PM	18	40	24	45
	4:00 PM	16	35	24	40
	5:00 PM	16	40	24	40
	6:00 PM	16	35	24	40
	7:00 PM	16	35	24	40
	8:00 PM	16	35	24	40
	9:00 PM	16	35	24	40
	10:00 PM	16	35	24	40
		Median Time	16	35	24
<b>20/09/2020</b>	7:00 AM	16	24	22	30
	8:00 AM	16	26	24	35
	9:00 AM	16	30	24	35
	10:00 AM	16	30	24	40
	11:00 AM	16	35	24	45
	12:00 PM	18	40	24	45
	1:00 PM	18	35	24	45
	2:00 PM	16	35	24	45
	3:00 PM	16	40	24	40
	4:00 PM	16	35	24	40
	5:00 PM	16	35	24	40
	6:00 PM	16	35	24	40
	7:00 PM	16	35	24	40
	8:00 PM	16	35	24	40
	9:00 PM	16	30	24	35
	10:00 PM	16	28	24	35
		Median Time	16	35	24

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 11 March 2020 12:06 PM  
**To:** DPTI:State Commission Assessment Panel  
**Cc:** [REDACTED]  
**Subject:** Re proposed Peregrine's Helipad

Thank you for sending information about the above development plan.  
According to the facts about the proposed helipad, I would agree with the opinion that it would be an unsafe development  
in our suburb.

Yours sincerely

[REDACTED]

[REDACTED]  
Marryatville SA 5068

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 11 March 2020 11:38 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Helipad at Norwood

Dear Sir Madam,

I live on [REDACTED] Kensington.

I strongly object to the proposed helipad by Peregrine Company at the proposed redevelopment on the corner of High St and Portrush Road.

It is totally ridiculous to have such a thing in the suburbs. Even New York City has prevented such things due to safety and noise.

The listed viable options incase of catastrophic engine failure is also unacceptable due to the use of school ovals. Helicopters are frequently involved in accidents and more unsafe than planes.

Perhaps you should go and stand within 100 meters of a landing or takeoff of a helicopter to appreciate the noise and disturbance and DANGER!!

Sincerely,  
[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 2:03 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Major development - Objection to the proposed Helipad, Peregrine at 270 The Parade, Kensington

12 March 2020

**Objection to the proposed Helipad, Peregrine at 270 The Parade, Kensington**

At number [REDACTED] **Kensington** we are extremely close to the Peregrine building and the proposed helipad and we strenuously object to the proposed helipad for the following reasons;

Noise and Mental Health

Frequent disruption and loss of amenity in terms of noise.

Our previous lived experience with helicopter noise (at higher altitude than proposed here) tells us there will be extraordinary noise pollution. Vibrations that rattle windows in buildings and cause major noise distress to occupants. The noise becomes louder as it reverberates between buildings. We cannot afford to noise proof the building.

We are not situated near an airport for a reason as one of us suffers panic attacks with loud noise.

Safety

This is a residential area with our premises, other residents and apartments close to the proposed Peregrine building. A church spire and a major intersection, residences; we do not accept that it's safe for a helicopter to be landing and taking off from the proposed building.

Loss of privacy

Loss of privacy with an aircraft hovering at low altitude above our premises as it manoeuvres for landing, multiple times a day.

Value loss

Loss of value of the property.

Regards

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 3:02 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** PEREGRINE'S HELIPAD DEVELOPMENT PROPOSAL

I wish it to be known that I strongly object to the proposed helipad being built in Kensington.

The reasons for my objections are too numerous to detail here but I can assure you, if the proposal is approved, I and many others, will be voting LABOR at the next State election.

Yours faithfully

[REDACTED]  
[REDACTED] Kensington, SA 5068

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 3:18 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Submission re proposed helipad on Peregrine office tower

I moved to Adelaide in 2008, at the age of 70, after 40 years in the country. I chose to settle in Kensington because of the safe, peaceful atmosphere of the 'village' and because I was assured that the existence of "heritage items" would ensure that the some-what 'old-world' charm of my home would not come under attack. Needless to say, I objected vociferously to the Peregrine Company being granted permission to build its out-of-character head-quarters on Norwood Parade. This permission showed a blatant disregard for the wishes of the community and the development rules of the Council, as well as a pandering to the desires of an oligarch bent on self-aggrandisement. It was, I thought, the first 'breach in the dyke'..... allow money to over-ride heritage once and more impingements will surely follow. My fears have proven true..... a helipad.... a multi-level car-park where houses now stand.....what more?

My concerns re the proposed helipad:

Reports of the experts re noise levels claimed that the noise of a helicopter landing, lifting off, hovering is no greater than that of a passing semi-trailer. This may be true, but the effect of these noises is quite different. Three streets back from Portrush Road, I am rarely aware of traffic on that highway whereas, on the odd occasions when a helicopter..... police/media...flies overhead, or even in the vicinity, the "chop" (We know why they are nick-named "Choppers") of the blades..... an entirely more intrusive and threatening sound than the susurrantion of truck tyres on tarmac....beats at the air, rather than moving through it.

SAFETY: Everybody knows that no matter how well-maintained, nor however skilful the pilot, helicopters DO crash. And what more perfect spot for an apocalyptic film scenario than a helicopter falling out of the sky at the moment of maximum traffic flow at the Portrush Road / Parade intersection :Or, perhaps, as it loses its rotor blades and gyrates madly slicing off the spire of the church or setting fire to Mary McKillop's (heritage listed) chapel: Or, possibly, in search of a designated emergency landing space, it wipes out years 3 and 4 of one of the local schools. Regardless of the safety precautions promised, in good faith, by the proponents of the scheme, no rational human being could believe that the community can be completely protected from a catastrophe.

Economic Impact Guideline 6 states that the proposal should make a positive contribution to the commercial functions of the Norwood/Kensington area.... The Fyfe assessment found that "due to the limited and integrated use of the proposed helicopter landing facility, the proposal would likely generate no further economic contribution or impact on the Norwood/Kensington Precincts" ..... "it is not expected in its own right to have an economic impact on the Norwood/Kensington Precincts". At a Public meeting, representatives of the firm were asked for details of any business plan which showed the value of the proposal to the local community. They responded with the mantra, "Jobs. More investment in the state"..... those same things which were offered as inducements for acceptance of the original building plan (sans helipad)These representatives were completely dismissive of the local concerns and could not offer any proof that there would be local or even broader job creation as a result of this proposal and no figures re financial or social gains.(It seems important helicopter visitors will not be investing in coffee on the Parade!))

So... cui bono? The residents and businesses of the Norwood/Kensington Precincts will benefit in no way from the Peregrine monolith nor from its proposed helipad. We stand only to lose..... presumably for the financial gain and self-importance of the company's owners. Why, in a supposedly Democratic state, does the voice of one man drown out the voices of the community?

As a resident and rate-payer, I vehemently oppose the proposed construction.

[REDACTED]

[REDACTED]  
Kensington 5068

12 March 2020

The Minister of Planning  
[REDACTED]

Department of Planning Transport and Infrastructure

GPO Box 1825

Adelaide SA 5001

Dear Sir

Re: Peregrine Corporation Helicopter Landing Facility 270 The Parade Kensington

I am a concerned local resident of Portrush Road at Kensington and I write to express my strong opposition to the proposed helicopter landing facility at the already approved 7-storey Peregrine Corporation building at 270 The Parade Kensington.

I submit that the proposed helicopter landing facility is not a suitable or appropriate use of the land on several grounds. Firstly, the location of the proposed landing facility within a closely settled, established area comprising residential properties, churches, schools, aged care facilities and commercial premises is inappropriate. The Kensington Norwood area comprises many properties of significant historical value, particularly on the three corners of Portrush Road and The Parade. The use of the helicopter landing facility in the manner proposed will cause significant disturbance and loss of amenity to other land users in the form of significant additional noise, vibration and nuisance over significant areas.

Further, flight paths are subject to changing weather conditions and it is not possible to specify precisely what approaches to the landing facility will be required. Thus the area affected could be far greater than has been contemplated in the Aviation Specialist Advice report as tendered by the Peregrine Corporation.

The nature of the closely settled area surrounding the proposed helicopter landing facility greatly increases the risk to the safety of residents, school students and property, shoppers and people driving in vehicles on Portrush Road and The Parade (62,000 vehicles a day!) in the event of a catastrophic engine failure and subsequent emergency landing. A number of local school ovals and a public park have been nominated as emergency landing sites. You will agree that the designation of these sites is potentially extremely unsafe as it is very likely that school ovals and other public parks would be occupied at precisely the time when an emergency arises and with little or no warning. How would you feel if your child or grand-child were exposed to such a situation? Or what if you were driving along one of these major roads and there was an accident involving a helicopter taking off or landing from the above-mentioned landing facility?

It is proposed that the facility would be limited to use on 10 days of the year between 7.00 am and 10.00 pm during "daylight hours". The proposal fails to state how many movements/flights are

anticipated on each of the 10 days. It would be completely inappropriate to grant approval of this facility when the full extent of its use has not been specified. What is more, how will any conditions be enforced? By whom? What sanctions would be imposed if conditions are breached?

In summary, the approval of the helicopter landing facility in such a closely settled area presents an unacceptable risk to residents, school students, drivers of private cars, buses, trucks and other vehicles on Portrush Rd and The Parade. It will cause significant loss of amenity to land holders and other users.

As a resident I do not want to be exposed to the noise and danger of such a "facility" and it would be completely irresponsible for any authority to place its citizens in such potential danger. We have the Adelaide Airport for air-traffic and it is conveniently located close enough to the city-centre, Norwood and Kensington. That is where the helicopter should be landing and taking off and not within a closely settled area such as 270 The Parade, Kensington.

Thank you for consideration of my submissions.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

Minister for Planning

[REDACTED]  
Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[REDACTED]

Dear Minister

I write to express my strong opposition to the proposal by Peregrine Corporation to establish a helicopter landing facility on their proposed new building at the 270 The Parade, Kensington.

In the public environment report there are a number of matters that make it clear that the establishment of a helicopter landing facility poses an unacceptable risk given the close proximity of schools and local residents and that the applicant appears largely dismissive of those risks.

In the report (page 234 of the pdf document - page 2 of a letter dated 7 June 2019 to [REDACTED] [REDACTED] Peregrine state in response to emergency laydown areas (including St Ignatius College identified as an "ideally located" emergency diversion area) that:

A helicopter "emergency laydown area" can be any area that can contain the size, or "D" value of the helicopter i.e. 15-20 metres. **However this is not relevant to the assessment of the proposal**, as only the helipad design and surrounding environmental considerations should be taken into account.

It is evident from this response that Peregrine do not consider that where a helicopter may crash to be relevant to their proposal. With respect, it is clearly the most important issue to consider. Any objective assessment must consider the risk of a crash and the potentially catastrophic consequences should that occur on St Ignatius oval when there may be hundreds of children on the oval.

On page 23 of Peregrine's public environment report, in response to the *adequacy of clearance distances from sensitive land uses in the event of a catastrophic engine failure or catastrophic landing* they have stated:

**Fortuitously the proposed Head Office site is strategically situated in an area surrounded by multiple available sites that could be used as emergency laydown areas.** As all operations will be conducted during daylight hours only, all these sites become viable options for emergency use. **In an emergency landing situation helicopters, unlike fixed wing, only require a small area for an emergency landing.**

While the presence of the St Ignatius oval may be “fortuitous” to Peregrine they are referring to a school oval that they do not own, have no access to and exists solely as a safe and secure open space area for children of St Ignatius College and St Joseph’s school. It is not, nor should it ever be envisaged as a suitable location for a helicopter to crash land. Relying on the nearest school oval as a key supporting reason why a helipad is appropriate and should be approved is both astounding and ridiculous.

I understand that the chance of a helicopter crashing on take-off or landing is low, however, the consequences of that happening from this building, coupled with the fact that the oval at St Ignatius College is designated (on page 9 and 14 of the flight safety report – Appendix D page 94 and 99 of the pdf document) as the emergency diversion / “lay-down” area, are potentially catastrophic. The planning system is meant to ensure that development only occurs where it is appropriate and reasonable having regard to surrounding land uses. Allowing someone to build a helipad atop a building adjacent to schools and dwellings, and then designating the nearest school oval as the crash landing site is clearly not appropriate. Nor is it reasonable when considered against the potentially catastrophic consequences of a helicopter crashing. Based on this logic does that mean a new school at the end of the Adelaide Airport runway would be deemed appropriate and receive planning approval?

Within the City of Adelaide the only helicopter landing facility is at the Royal Adelaide Hospital. That is both an expected and necessary facility. There are, unsurprisingly, no helicopter landing facilities on any other building within the City of Adelaide.

It is worth noting the City of Melbourne, a vastly larger city with many more corporate headquarters, only allows helicopter landing pads on the Yarra River. This is no doubt to mitigate the consequences of a helicopter crashing on take-off or landing. Similarly New York City does not allow helicopter landing facilities to be placed on any buildings within the city. They too, have helipads located only on the Hudson and East Rivers.

I trust that you will carefully consider this matter and form the view that the proposed helipad poses an unacceptable risk and will not be approved.



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 5:17 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** The proposed Helipad on the Peregrine building

To the Minister for Planning

[REDACTED]  
Dept. of Planning, Transport and Infrastructure.

Dear Minister

I write to protest most strongly against the proposal by Peregrine to add a helipad on top of their new building on the corner of High St, Kensington, and Portrush Road, Norwood.

I cannot imagine any more foolhardy idea than having helicopters taking off and landing on that point of an already hectic corner.

There is a convent on one other side, and a historic old church on the other, both of which would be badly affected by the noise helicopters make.

I live further up [REDACTED] and still will be affected by helicopter traffic as everyone knows what a very loud noise they make.

What is more, while one side of Portrush Road is partially, but not completely, businesses, High St is 90% domestic with valued, and quite valuable houses that have been cared for and loved by their owners for years in many cases.

The nonsense of when helicopters get into trouble that they will be able to crash land on SCHOOL LAND is unbelievable and will be most unpopular among the rate payers.

The owners of Peregrine are very wealthy and consider they can do what they like, but the local residents hope that you as the Minister will see this plan as what it is, a selfish, greedy grab for a convenient way of getting Peregrine's clients from town to the car racing ground in the minimum time.

I hope that you will listen to the many residents who are extremely concerned about this proposal, and dismiss it.

Yours sincerely

[REDACTED]  
Kensington, SA 5068,  
12/2/20

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 5:35 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Major development proposal \_Peregrine Mixed Use - Helicopter Landing Facility

Minister for Planning  
Attention Robert Kleeman

Dear Minister,

I have recently attended the Public consultation at Norwood Town Hall.

I am a local resident living at [REDACTED] Norwood- near the intersection of Portrush Rd.

I oppose the development.

I am particularly concerned at the safety of the proposal and the noise.

As a regular attender at functions at Clayton Church on the corner of Portrush and Norwood Parade, I am concerned at the impact of helicopter noise. Having many helicopter take-offs and landings during services, weddings and funerals would be most unfortunate. Also the impact of noise during our regular meetings in the Church Hall.

I understand that the proposal only requires 24 hours notice of the days the helicopter pad will be used, and in a format that is yet to be decided.

The attitude of the Peregrine representatives at the meeting was most unfortunate, leading to the expectation that the smallest notice in the public notices would be employed. Or maybe on a notice on Peregrine's social media when none of us use Facebook etc...

How could one plan a wedding or anniversary( or even a funeral) in advance when you wouldn't know if it would be wrecked by the noise. Weddings are typically planned 18 months - 2years in advance, and this should be the designated advance notice if the Government makes the decision to proceed.

I do not think there should be a helicopter pad on top of this buildi, in a built up residential area. We do not need a major accident.

I was also concerned at the meeting that there was continual reference to the "benefit of the community". It certainly wasn't to the benefit of the local residents. I can only assume it mean the "business community in broader SA".

Perhaps Peregrine could explain the benefit to the local community???

I support the Norwood, Payneham and St Peter's Council in opposing this Proposal.

Yours sincerely,

[Redacted]

Norwood

[Redacted]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 4:54 PM  
**To:** DPTI:State Commission Assessment Panel  
**Cc:** [REDACTED]  
**Subject:** The Minister for Planning c/- [REDACTED], Dept. of Planning, Transport and Infrastructure

To: The Hon. Mr Stephan Knoll,  
Minister for Planning,  
[REDACTED],  
Department of Planning, Transport and Infrastructure.

Dear Sir,

I lodge, herewith, an objection to the proposed Helipad/Heliport as part of the proposed development by Peregrine Corporation at the corner of The Parade and Port Rush Rd., Norwood.

There is neither a community nor medical **need** for the access to helicopter transport to or from the location at the location.

In the event of a catastrophic engine failure the likelihood of resident and or commuting population injury or death and property damage within the densely populated area is extreme.

The passage of helicopters will markedly effect the daily lives of thousands of residents and workers over a broad area via extreme noise pollution, exhaust emissions and compromise the safety of the area. In particular, as the flight path (in the majority) could pass directly above or adjacently above my home I object on the grounds of noise pollution, personal safety and reduction in lifestyle.

The presence of incoming and exiting aircraft will be a visual distraction to some road users and, hence, may cause an increase in vehicle accidents at an extremely busy intersection.

There are other potential helicopter landing areas nearby eg. the old Victoria Park racecourse merely minutes away from the proposed development.

The presence of a helipad and consequent air traffic would have a negative effect on the relatively quiet area and hence could markedly reduce domestic property values and rental income within the area.

The use of helicopters as a method of transport for few people flies in the face of the spirit of the National carbon emission reduction targets.

The presence of an aircraft on top of the building may exceed the maximum allowable/approved height of the building.

ADDITIONAL OBJECTION TO THE DEVELOPMENT

The development of the building must incorporate vehicle parking facilities for total vehicle-commuting employees and visitors as the surrounding residential streets are already clogged (prior development) with employee daily parking and visitor vehicles causing reduced amenities, inconvenience for residents and on-street safety in narrow streets within the area.

This is an historical issue, has involved considerable resident interaction with the Burnside Council and consequent Council expense in monitoring illegal and inconsiderate vehicle parking.

Minister, I respectfully request that my objections and those of other objectors be given consideration and that the approval of the proposed Helipad/Heliport be denied.

I request that I be kept informed as to the outcome of this objection and the outcome of the proposal to allow/approve a Helipad/Heliport as part of or at the proposed development.

In good faith,

[REDACTED]

Beulah Park SA 5067,  
Tenant Resident since Nov 2010.

[REDACTED]

[REDACTED]



Email: [norwoodresassoc@gmail.com](mailto:norwoodresassoc@gmail.com)  
Website: [www.norwoodresidentsassociation.com](http://www.norwoodresidentsassociation.com)  
Facebook: [www.facebook.com/NRAso](http://www.facebook.com/NRAso)

Minister for Planning  
[REDACTED]

Unit Manager Policy and Strategic Assessment  
Planning & Land Use Services  
Department of Planning, Transport and Infrastructure  
[REDACTED]

Thursday, March 12, 2020

## **MAJOR DEVELOPMENT PROPOSAL Peregrine Mixed Use Major Development - Variation 2 Helicopter Landing Facility**

Dear [REDACTED]

The Norwood Residents Association strongly opposes the development application by the Peregrine Corporation to include a helipad in the proposed re-design of its headquarters at the junction of The Parade and Portrush Road in Kensington, SA on the following grounds:

### **1. SAFETY**

For most residents (especially the estimated 10,000 who live in direct line of the flight path), this is a CRITICAL issue.

At the Norwood Concert Hall Community Information Session, 'expert' spokesperson Mr Colin Weir, took great pains to reassure attendees that no expense was spared in relation to the quality of the helipad landing site and that his professional experience in training pilots and implementing safe flight practices was well tested and documented. What was quite apparent though, was that his expertise was largely confined to dealing with offshore oil-rig sites and a development within a major airport, NOT densely populated residential areas like Norwood.

Statistics indicate that most incidents involving helicopters occur close to take-off and landing. Given the densely built-up surrounds and high traffic volume along Portrush Road and The Parade close to the Peregrine building, any incident/crash occurring within the vicinity of the helipad could potentially assume catastrophic proportions.

The best way to manage any identified risk is to eliminate it, yet while the Peregrine proposal details various risk management processes such as the company's 'no expense spared' helipad design etc, it lacks any clearly articulated, objective, overall risk assessment. For Norwood and Kensington, community well-being/safety is dramatically different if no helipad is EVER built and any helicopter joy flights for Peregrine's interstate/overseas clients begin and end instead from our nearby Adelaide Airport – the likely entrance point for guests anyway.

Helicopters do not have a good safety record (consider 15 United States helicopter accidents claiming 27 lives in the first 6 months of 2019), yet all conceivable approaches to the Peregrine helipad span heavily populated residential sites (and soon 8 storey Coles towers) and schools.

Parents of over 3,000 students in this area do not want the safety of their children even remotely jeopardised. Any wonder that Peregrine's inclusion of St Ignatius College playfield ('ideally located' according to the PER) and the school ovals at Loreto College, Marryatville High School, Marryatville Primary School (with high voltage wires) and Pembroke College in their list of designated emergency laydown sites, raises serious questions about availability and suitability. What consideration has been given to the associated risks of a helicopter in trouble and an oval filled with schoolchildren?

## 2. NOISE/VIBRATION

Sonus Acoustic Engineers recorded background noise levels in Bowen Street over a ONE week period to compare with noises (around 87dB(A)) as emitted by Bell 206 Jetranger, Eurocopter AS350B2 and AW109/H109 helicopters proposed for Peregrine's use. These daytime noises averaged out at 70dB(A), despite brief, unexplained spikes reaching 95-100dB(A) on 3 occasions. While the Sonus report claims one thing, separate investigation by Norwood, Payneham & St Peters Council cites BlueSkyRotor.com evidence that Peregrine's 3 proposed helicopters would have 'noise at takeoff limit' levels ranging from 92-94dB(A) – more than FOUR times louder than average daily background noise and lasting considerably longer than any thus far recorded 'spike'. The resulting noise would not only be highly disruptive/intrusive for nearby residents in itself, but also potentially exacerbated by prevailing weather conditions. The Fact Sheet (below) identifies 57dB(A) as the level of aircraft noise considered annoying by the general community.

[https://www.defence.gov.au/aircraftnoise/Master/docs/nfpms/Factsheet Measurement of aircraft noise.pdf](https://www.defence.gov.au/aircraftnoise/Master/docs/nfpms/Factsheet%20Measurement%20of%20aircraft%20noise.pdf)

Furthermore, while the Sonus report disputes negative impact to surrounding buildings caused by ground vibration, we believe damage to the spire, stonework and fragile stained glass windows of the iconic Clayton Wesley Uniting Church is highly likely as a result of the vibration caused by rotor wake during take-off and landing. The State Heritage listed (former) Wesleyan Methodist Church, on the North-Western corner of the intersection is also at risk and the impact of rotor blade downwash on nearby building cladding or the Water-Tower Telecommunications aerial, is yet undetermined.

Mr Weir's dismissal of such concerns because these forces only come into play during a 'hover', presumably over the landing pad, does not anticipate variable circumstances/delays causing the need for craft to hover in any different location.

### 3. AMENITY

The helipad's proximity to a Residential Historic (Conservation) Zone and Mixed Use Historic (Conservation) Zone is a major concern. Helipads are incompatible with residential zones and even Sydney and Melbourne Central Business Districts do not support them.

The Victorian Department of Planning and Community Development considers that land uses like accommodation and child-care/education centres are 'sensitive' to the potential adverse amenity impact of a helicopter landing site. In 2018, Stonnington Council (Victoria) rejected developer Larry Kestelman's bid to build a landing pad atop his 54 storey Capital Grand building in order to ferry a small number of wealthy residents to events like the Grand Prix and Melbourne Cup. Flights were to occur no more than twice a day between 7am and 10pm. The refusal centred around:

- Noise level
- Perceptions of safety
- Unfair development of land
- An incompatible use within a high density mixed use activity centre and inadequate separation distances from nearby sensitive residential areas

Helicopters flying over, landing and taking off will substantially compromise the amenity of Norwood and Kensington citizens within the flight path. With flights being confined to daylight hours, children in classrooms will find it difficult to concentrate or hear when a helicopter passes overhead and local businesses/residents will be similarly affected. Those attending Clayton Wesley Uniting Church services (should flights coincide) and occupants of the nearby Water Tower and Nuova residential apartments, will be especially disadvantaged by noisy take-offs, landings and any hovering.

Residents also do not believe the assertion that landings and take-offs will only take two minutes, nor that the number of flight days will always be limited to 10 per year, as claimed. Clearly the facility has the capacity to be utilised much more frequently, as warranted by its structure and significant investment. Keeping the original proposal to 10 days simply allows Peregrine to first get its foot in the door and then later exert pressure to increase that number. Interestingly, part of Peregrine's documented business policy reads, "We don't stop until we win". Furthermore, there is no statement by the Peregrine Corporation as to the exact number of flights likely to take place on each of the 10 days, though the suggested number is around 10. Should the onus of usage record keeping fall on the applicant, there are obvious difficulties associated with external scrutiny/enforcement of same.

Norwood already has its tranquillity interrupted by the annual Clipsal event with car engines roaring and low flying jets. The new prospect of 10 days with up to 10 helicopter flights per day is yet another intrusion into people's lives and a distinct disincentive to reside in the area. One local resident has already complained that the likelihood of the Peregrine helipad recently caused him to sell his home. While people are happy to tolerate noise and inconvenience to serve the greater good (eg emergency hospital retrievals, security patrols and promoting events to attract tourists/visitors), they are less likely to embrace similar scenarios resulting from self-serving commercial interests, yielding little/no benefit to the wider community. Peregrine's outright dismissal of the Helicopter Association International's 'Fly Neighbourly Guide' as having no legal standing or relevance to this application, says much about their community sensitivity.

Admittedly large cities like Djakarta utilise helicopters as a means of city transport to circumvent traffic jams. However, their helipads are located atop 50 storey buildings (not 7) and anecdotal evidence from ex-patriots residing there, suggests that even at that height the noise is quite noticeable. Given the fact that the Peregrine structure is considerably lower, these same problems will be greatly magnified.

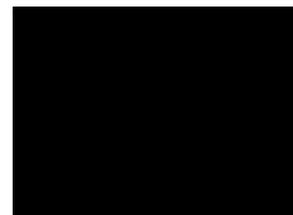
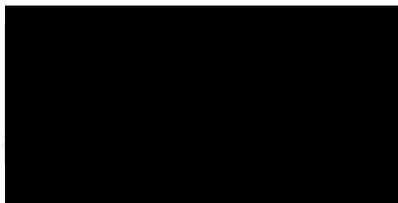
#### 4. PROPERTY VALUES

In good faith, residents already living in the area have invested time and money into their properties, with expectations of a certain quality of life. For them a local helipad with accompanying noise levels and safety issues was not part of the original equation. Unlike those who years ago capitalised on cheaper properties **because** they were located near the Adelaide airport, Norwood and Kensington owners now face a serious risk that their property values will diminish. Why should the 'value adding' (yet there is no in-depth analysis to support these assertions) of a helipad to headquarters in order to further the business interests of a few, far outweigh the rights of many local residents to protect possibly the single biggest financial investment they will make in THEIR lives?.....their home.

#### 5. CONCLUSION

Given Peregrine's lack of warranted, adequate research to convincingly address community concerns, despite the massive impact this proposed helipad will have on residents' safety and amenity, we respectfully urge DPTI and our Governor to reject this Major Development Variation.

Sincerely,



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 8:54 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Major Development Proposal - Peregrine Mixed Use Major Development

Major Development Proposal

Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

Tell US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent’s Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available that way.

[REDACTED]

[REDACTED]

[REDACTED]

What is your interest in this proposed development?

Local Resident

What is your overall position on the proposed development?

I oppose the development

Do you have concerns regarding the proposed development?

Yes.

- It has been proposed that the helicopter landing facility will be operate for up to 10 days per year, during daylight hours. The onus is on Peregrine to keep record of the usage. Who will be responsible with policing and auditing this record? What will be the consequences of the Applicant operating the landing facility beyond this limit?
- There has been no limit proposed for the number of times per day the facility may be used within those 10 days. Peregrine has also advised landing and takeoffs will be during daylight hours only. In summer, sunrise is as early a 5.55am, sunset as late as 8.30pm.
- The Victorian Planning Requirements for heliports and helicopter landing sites states that no additional permit is required if the frequency of the number of flight movements is no more than 8 in a 30 day period, and 4 in a 24 hour period, with the take off and landing calculated as separate flight

movements. The City of Adelaide states that a maximum of six helicopter landings per year can be approved for any one company. The reason for this cap is primarily to maintain the primary use of the Park Lands and allow the community access, minimise the level of disruptive noise for local residents, protect the biodiversity and condition of the parklands overall. Why is Peregrine allowed unrestricted number of flights, provided the landing facility is only used for 10 days of the year?

- ATSB states that for the year of 2008-2016, the accident rate (per million hours flown) for private/business use was higher for helicopters than for aeroplanes. The safety risk to local community, especially in the middle of suburbia, has not been adequately assessed and addressed by the Peregrine's Aviation Specialist Advice report. The report provides risk management responses, but there is no information provided on the statistics that would quantify the actual risk to local residents, especially when considering the fact that vast majority of accidents occur during takeoffs and landings. Rooftop landings also require skill to maneuver the helicopter close to buildings. Wind conditions and a pilot's ability to pilot the helicopter can result in loss of control of the helicopter during landing and takeoff, with catastrophic effects in an urban setting.
- Emergency landing sites proposed include local schools. How is it conceivable that this would even be an option? How would it even be possible to safely evacuate these students in time in the event of an emergency landing? To consider these sites as possible emergency landing sites is blatant disregard to the welfare and safety of these students.
- Rotor downwash from helicopters can cause damage to surrounding heritage buildings. This has not been adequately assessed/address in the PER presented by Peregrine.
- Noise impact on local residents. Helicopters are synonymous with 'noise'. Noise from the main rotor is mostly directed downward, because it radiates off the underside of the blades. This would have a significant impact on local residents with the helicopter landing at the top of the Peregrine building.

What could be done to address your concerns?

It is glaringly obvious that the proposed helicopter landing facility will benefit a very select few, ie Peregrine's VIP guests; at great detriment to the local community, surrounding heritage buildings and the neighbourhood. With the addition of the safety risks to local residents, students at local schools, it is very clear that Peregrine is solely fixated on its own economic gain, with complete disregard for the concerns of the local community, or potential impact to the local neighbourhood. In the interest of the public, this proposal must be overturned.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 9:17 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine's Helipad

[REDACTED]  
Minister for Planning  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000.

Dear Sir

I write on behalf of my mother, [REDACTED] Kensington, S.A. 5068 and myself, [REDACTED], Kensington, S.A. 5068.

We both advise that we oppose the construction of a Helipad on the south eastern corner, i.e. Peregrine's new Office Complex, in fact we oppose the development of the new office block as well.

The main reasons are :-

Undue noise will disrupt area, residents and school classes. (see point 2)

It is in an area that there are schools, hospital/nursing home and residential homes.

The possibility of an aviation crash in the area. i.e. the possibility of an engine failure.

We have an airport for aircraft to land on not in suburbia.

Without prejudice.

[REDACTED]

[REDACTED]  
Kensington, SA, 5068  
[REDACTED]

11 March 2020

**Minister for Planning**

[REDACTED]  
Unit Manager Policy and Strategic Assessment Planning and Land Use Services  
Department of Planning, Transport and Infrastructure  
GPO Box 1815 Adelaide SA 5000  
[REDACTED]

**Peregrine Corporation Helicopter Landing Facility Public Environment Report Response**

Dear Minister

I strongly object to the construction of a Helicopter Landing Facility (helipad) at the Peregrine Major Development located 270 The Parade, Kensington.

By way of background I am a professional pilot with 15 years military and 15 years civilian flying experience.

Firstly and importantly I want to highlight that the Applicant has clearly stated in the Public Environment Report (PER) that this helipad will create no economic benefit.

***PER (para 5.3.2)** “The Fyfe assessment found that due to the limited and integrated use of the proposed helicopter landing facility, the proposal would likely generate no further economic contribution or impact on the Norwood and Kensington Precincts and beyond that of the previously approved Headquarters redevelopment.”*

The Applicant further states that there will be no more jobs created from the construction of the helipad.

***PER (para 5.3.3)** “The updated report found that the integrated nature of the facility on the roof of the approved building, reinforces that no significant local or broader job creation will result from the construction of the helicopter landing facility itself (i.e. the landing facility will be delivered as part of the overall building works)”.*

So why the need for a helipad? We are given fleeting references to the requirement for a pleasurable experience for visiting business guests, and the need to transport guests to The Bend Motorsport Park. It is extremely disheartening and disappointing to think that the local

community will suffer more noise, that they will suffer more pollution and that they will be forced to accept an increased safety risk so that a very few, select, privileged business guests over 10 days of the year can save less than 15 minutes in a car to the airport.

After reading the Public Environmental Report provided by the Applicant, I wish to highlight certain areas and provide some balance to the proposal. In particular I will reference Appendix L of the proposal, known as the Adequacy Check Feedback Applicant Response. This letter contains excellent points raised by the DPTI Transport, DPTI Planning, The EPA, ODASA and DEW State Heritage.

### **Appendix L Page 1**

**DPTI Transport Policy** – *The PER provides for a register of operational days and yearly audit process. The process to be adopted for the regular auditing should be clarified, including whether this will be available online for the community and adjacent neighbours to access. A complaints procedure should be developed in accordance with the Fly Neighbourly Guide by the Helicopter Association International (HAI) as a reference see 7.4.2 of the guide.*

**Applicant Response** - *A register of operational days will be kept by the applicant and will be made available if requested. The helicopter audit processes are confidential and are the property of Flight Safety and the client (PCI), the helideck audits are managed in similar fashion. The Helicopter Association International (HAI) "Fly Neighbourly Guide" has no aviation legal standing or relevance to this application.*

It's disappointing to see the Applicant not respond to the reasonable request that a complaints procedure be developed. The simple dismissal that the Fly Neighbourly Guide has no legal standing or relevance is not an encouraging sign that the Applicant will be sympathetic to the local neighbours and community. Their commitment to listening to the local community and working collaboratively with neighbours should be questioned.

### **Appendix L Page 2**

**DPTI Transport Policy** – *The PER references a number of locations that are identified as emergency laydown areas:*

- *Saint Ignatius College playfield field (west of Portrush Road) – also identified as an 'ideally located' Emergency Diversion Area;*
- *Croquet club at 259 Portrush Road, Norwood;*
- *Loreto College playing field, Kensington Road;*
- *Marryatville High School Oval, Kensington Road;*
- *Marryatville Primary School, Shipsters Road;*

- Kensington Park Oval, Olympic Lane;
- Haslam Oval, Magill Little Athletics Centre, Cnr The Parade & Gurrs Road;and
- Pembroke School playing field, Walsall St

*The risks and safety implications of utilising these areas for emergency landings should be further clarified in the PER, on the basis that these locations are available and viable for this purpose. It is acknowledged that their ‘availability’ would be sporadic depending on their use for educational and community purposes (and that discussions have been held with their operators/owners as to their current use). None of these locations should be used for ‘preplanned’ landings.*

**Applicant Response** - *A helicopter “emergency laydown area” can be any area that can contain the size, or “D” value of the helicopter i.e. 15-20 metres. However this is not relevant to the assessment of the proposal, as only the helipad design and surrounding environmental considerations should be taken into account. All other operational factors are already covered under the existing CASA (Civil Aviation Safety Authority) regulations. An information letter will be sent out to all owners / operators of sites identified in the PER as potential emergency laydown areas. No landings will be pre-planned at the identified “Emergency laydown areas”.*

The emergency laydown areas are mainly schools. The Applicants submission failed to acknowledge the risk associated with using school ovals and at times the unsuitability of those areas. Indeed one of the proposed sites (Marryatville Primary School) has high voltage lines running across the open space, a hazard for any helicopter! The report was weak in this area. The local community is being forced to accept a higher level of risk for no appreciable gain. For what would be a small inconvenience for an extremely small number of people (less than a 15 minute car ride to Adelaide Airport) the risk could be removed altogether.

### **Appendix L Page 3**

**DPTI Transport Policy** – *See above – further detail is required on physical obstructions, adjacent structures, use times and ranking of these emergency / forced landing locations.*

**Applicant Response** - *Helicopter operational procedures are the responsibility of the Helicopter Operator and Airservices, through the Adelaide Airport Control Authority. Multiple helicopter flights are undertaken on a daily basis over the Adelaide CBD area.*

The Applicant has rightly been asked to further explain contingency and emergency procedures, something intrinsic to the idea of building a helipad in a suburban

neighbourhood. Their response is that it's not their responsibility but that of the operators and the local controlling authority. Why have they not contacted or worked with local helicopter operators and the local controlling authority to ensure the safety of the local community? They have also highlighted that multiple flights over the CBD occur suggesting there is no issue. The flights over the CBD are at higher altitudes than the landing and takeoff phase (excepting emergency services), which lowers risk significantly over the CBD

### **Appendix L Page 3**

**DPTI Transport Policy** – *Would be assisted by further details regarding procedures to take advantage of meteorological conditions to minimise noise see HAI Fly Neighbourly Guide section 4.8.*

**Applicant Response** - *The HAI Fly Neighbourly Guide Section 4.8 is not relevant to this assessment.*

Once again we see the Applicant dismissive of a “neighbourly” approach. It is truly disappointing to see such an attitude given the nature of what is proposed!

### **Appendix L Page 4**

**DPTI Transport Policy** – *The assessment provided regarding risk of bird strike is very brief and does not consider the local context. The National Airports Safeguarding Framework – Guideline H provides additional guidance in this regard in terms of land uses which have the potential to be high risk wild life attractants. This section of the PER should be updated to review whether any of these land uses referenced in #72 of Guideline H are in proximity to the proposed helicopter land facility and if so how potential bird strike might be managed.*

**Applicant Response** - *The National Airports Safeguarding Framework – Guideline H is titled “Protecting Strategically Important Helicopter Landing Sites” which are defined as “a site declared by state or territory to be of critical need to the provision of identified services”. None of the high-risk land uses mentioned in Clause 72 of that document are present in close proximity to the subject land. Flight Safety Group has confirmed this document is not relevant to the assessment*

This is another excellent example of the detail lacking in the report. The suburbs around the proposed landing area are known for their leafy character, obviously a haven for birds and bats. The report has no detailed analysis of the risks associated with local helicopter operations and the impact with birds or bats. Adelaide airport has strict controls and procedures to minimise collisions with wildlife, obviously this is a safer place for the Applicant to charter a helicopter. Once again we see the local community being forced to accept more risk for no gain.

## **Appendix L Page 6**

**DPTI Transport Policy** - Confirmation that the total number of trips (which includes take offs and/or landings for each trip event) that might occur during each day of the 10 days (i.e. how many take off and landings may occur on any given day?) and clarification of the length of start-up and shut down noise timeframe and total number of minutes/hours for the full calendar year. These timeframes should also take account of take-off and landing procedures (i.e. engine warm-up, passenger departure or boarding etc.) for which a noise impact may result. These details should naturally form part of the noise assessment referenced above. Note - the PER does not make any reference to the potential to develop a Fly Neighbourly Agreement which seeks to address potential amenity impacts with sensitive land uses. Refer to Fly Neighbourly Guide – Helicopter Association International.

**Applicant Response** - The HAI Fly Neighbourly Guide is not relevant to this assessment and has no legislative standing. Peregrine Corporation cannot commit to how many landings / take-offs may occur on each of those (maximum) 10 days of use per year, there are limited numbers of the type of helicopters referenced for used in the PER. Use of these helicopters is subject to availability and operational procedures of the 3rd party Helicopter Operators. A useful description of the nature of the Helicopter Landing Facility including best estimated time frames for landing and take of procedures is outlined in Section 4a of the Aviation Specialist Advice Report prepared by Flight Safety included in Appendix D

Once again the DPTI is simply seeking clarity, confirmation and a commitment from the Applicant. It is yet again dismissed with the comment that “Fly Neighbourly” is not relevant. The Applicant will not commit to a number of flights and it’s left to the community to guess how many times they will be disrupted each day of operation.

In Appendix L, pages 4 through 6 the EPA asks and raises pointed questions on the issue of noise. It is intuitively obvious that a helicopter will add a great deal of disruptive noise to the local community. The area is currently free from any flight paths and arguably many people live in the area to specifically avoid the threat and noise of over flying aircraft. The EPA’s detailed request is a fair attempt to try and ensure that the local community does not suffer. The Applicant once again suggests it’s too onerous, outside scope, and not required. Simply put, the local community will suffer a huge amount of noise pollution for no gain and a minimal benefit to few.

Road safety is mentioned in the PER, but not in the context of low flying aircraft as a distraction to drivers. There has been no modelling or risk analysis of the distraction to drivers and pedestrians of a low flying aircraft. Approach and departure paths will be over Portrush Road, a major arterial, there is a real risk of low flying helicopters presenting a distraction to drivers.

Lastly, Adelaide Airport has a full time professional aviation fire fighting service which in all ways will eclipse the aviation firefighting and emergency services provided at the Applicant's site. There is no doubt in my mind that the passengers, crew and local community are accepting a higher risk than if the helicopter was to land and depart at Adelaide Airport.

On behalf of the local community and indeed the state of South Australia I implore our regulators and leaders to not allow an aircraft to operate in a local suburb. We are a fortunate city, transit times to our international airport are extremely short, there is no need to accept more risk and disrupt any local community to avoid an extremely short car ride for a privileged few.

Sincerely

A solid black rectangular redaction box covering the signature area.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 9:35 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine Development: Variation 2

Minister for Planning

[REDACTED]  
Dept. of Planning, Transport and Infrastructure.

[REDACTED]

The Peregrine argument for the “business efficiency” of the helicopter landing facility is not one which is beneficial to our local community of Norwood.  
The impact this development with its added road traffic will already be huge without adding to it with helicopter noise volume and the danger to nearby community spaces.  
Peregrine’s visitors can easily and efficiently be collected at Adelaide airport without them having them having the thrill of a helicopter ride.  
Such thrills are a childish and pathetic way to market to their prospective clients. Peregrine’s business does not need to rely on such marketing.  
Nor should the Norwood community have to suffer it.

I’ve been attending daytime functions (at least x4 per annum) at the Clayton Church Hall (immediately opposite) for the past 5 years.  
It would be very intrusive to have the noise of many helicopter take-offs and landings close to community venues and to an area of medium and high density housing.  
As a Minister, you would realise, there are many retirement villages and high rise apartment buildings within a one kilometre distance from that Peregrine site.  
Moreover allowing for any emergency helicopter landings on a number of the nearby school ovals / playing fields is a dangerous misuse of educational spaces.

As a local resident, I reject outright the proposal of the helicopter landing facility, and cannot understand why the government should accede to this proposal.

Yours sincerely,

[REDACTED]  
[REDACTED]  
Norwood, 5067

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 12 March 2020 9:48 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Opposition to Peregrine's Variation 2:Helicopter Landing Facility Proposal  
**Attachments:** Peregrine submission.docx

Details in the attached letter.

Minister for Planning

[REDACTED]  
DPTI

GPO Box 1815

ADELAIDE SA 5000  
[REDACTED]

11/3/2020

Dear Minister

I strongly oppose the Peregrine Variation 2: Helicopter Landing Facility.

I am a local resident and grandfather with my daughter's family living nearby in Norwood and including 3 local school attending children.

My concerns are:

- which independent authority would ensure accountability of Peregrine to comply with the 10 days per year limitation and how the public could check on this.
- the length of time noise levels would remain high (example given was 95Db) for a helicopter approach, hover, landing, shut down, preparation at start up and take off. This collective time could be repeated 8 times across all 10 days per year
- what is the second landing pad intended for – there is no reference to its purpose in the PER. The proposal for 2 helipads has future capability to significantly increase the number of flights. Again which authority would monitor/ensure compliance of days of use?
- how many helipads are located in medium-density residential areas, near Adelaide CBD (less than 5km radius from CBD)?
- how the public would be notified of intended days for Helipad use – this could have implications on students completing exams, weddings and funerals being held in nearby churches (St Ignatius, Norwood and Clayton-Wesley, Beulah Park) and other local school/sporting/community events which avail of our attractive local outdoor spaces, facilities and general amenity
- Significant helicopter noise/approach/take off distraction to traffic along the major arterial route of Portrush Road – cited as 37 200 vehicles/day (Appendix J p410), including a considerable proportion being heavy vehicles. These residents already experience high level of noise from heavy vehicles and would be doubly invaded by the helicopter noise
- helicopters (as with all aircraft) are more likely to be involved in an accident close to the point of takeoff or landing. In Appendix D (p 279), the Aviation Consultant for Peregrine comments: *'Fortuitously the proposed Head Office is strategically situated in an area surrounded by multiple available (emergency landing) sites'*. It is important to note 6 of the 7 nominated sites are school ovals with high student useage and indicative of the local area being a medium-density residential family-friendly area unsuitable for a nearby local helicopter landing facility . The implications to our

neighbourhood in the event of a helicopter accident would be catastrophic and within the PER do not report to be of concern to Peregrine.

- I note in Appendix K Fyfe acknowledges the Helicopter Landing Facility 'is not expected in its own right to have an economic or employment impact on the Norwood and Kensington Precincts'. Local residents lose amenity and there is no benefit to them in this proposal.

As a local resident, father and grandfather and all living nearby, I strongly oppose the invasion of local amenity, public spaces and quality of life by the use of a helicopter landing facility in our near-city, medium density, family-friendly neighbourhood that has sought-after real estate appeal. Two of my grandchildren attend St Ignatious and one Loretto College and my three youngest grandchildren attend Norwood Primary School and these children deserve to be considered by the Minister above 4-7 helicopter passengers. Are the grounds of their schools being considered as emergency landing sites?

I would propose Peregrine seek Victoria Park for helicopter transportation if it is Peregrine's view that travelling by car 20minutes to Adelaide Airport is inconvenient for their business operations. Victoria Park has considerable open space and has been previously used for helicopter use.

I refer to the Appendix A page 6 of the Guidelines for the preparation of a Public Environment Report:

The Governor can at any time indicate that the development will not be granted authorisation if the development is inappropriate or cannot be managed properly.

I consider Peregrine's Variation 2: Helicopter Landing Facility proposal to be inappropriate, **10 000 local residents** (ABS 2016 Census) who live within 1km of the Peregrine site when Peregrine propose to **transport 4-7 passengers at a time** via helicopter to conduct their private business operations.

I strongly urge your Department to demand clarifications from Peregrine on the concerns and issues above, and consider the needs and quality of life of a large local community over a single business operator.

Yours sincerely,



Norwood, SA 5067

[REDACTED]

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**From:**

**Sent:**

[REDACTED]  
Thursday, 12 March 2020 10:43 PM

**To:**

DPTI:State Commission Assessment Panel

**Cc:**

Kensington Residents' Association [REDACTED]

**Subject:**

PEREGRINE CORPORATION HELICOPTER LANDING PROPOSAL

Minister for Planning

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 7:16 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** FW: PEREGRINE CORPORATION HELICOPTER LANDING PROPOSAL  
**Attachments:** Peregrine Submission.docx

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[REDACTED]  
**Sent:** Thursday, March 12, 2020 10:40 PM

[REDACTED]  
**Cc:** Kensington Residents' Association [REDACTED]  
**Subject:** PEREGRINE CORPORATION HELICOPTER LANDING PROPOSAL

Minister for Planning

[REDACTED]  
Dept of Planning, Transport and Infrastructure,  
GPO Box 1815, Adelaide. SA 5001

Please find attached my submission re the above Proposal.

Kind regards

[REDACTED]

12 March, 2020

Minister for Planning  
[REDACTED]

Dept of Planning, Transport and Infrastructure  
GPO Box 1815, Adelaide SA 5000

Dear Sir,

Re: Peregrine Corporation Helicopter Landing Proposal

I wish to register my opposition to the Peregrine Corporation Helicopter Landing Proposal.

I live in a Local Heritage designated cottage in [REDACTED] Kensington which is approximately 500 metres from the Peregrine building. I, therefore, have the likelihood of being significantly affected by this proposal if it is accepted. I have lived in this residence for approximately 20 years and, during that time, have seen the amenity of the area adversely impacted by development and the area become more congested due to the inability of whichever authority is responsible to deal effectively with parking and traffic management. This will only be made worse by the Peregrine development and, with the addition of a helicopter hovering overhead, there will be a much greater likelihood of further traffic disruption and deterioration in the amenity of the area.

I would like to make the following points:

1. Portrush Road is used by many large commercial vehicles and the Portrush Road /Parade corner is often congested because of the large volume of traffic which flows through that intersection. Not all of the drivers who are passing through the area would be aware of the possibility of low flying helicopters and the shock and distraction caused by this would undoubtedly contribute to accidents in that vicinity. As a person who must use that intersection regularly, I consider that I could

be very vulnerable to being involved in an accident as a result of this, not to mention other unsuspecting motorists and pedestrians.

2. I live in a row of matching heritage cottages. These cottages were built in the 1880's without foundations and are, therefore, very vulnerable to earth movement and vibration. I understand that the Peregrine EP purports to deal with this issue by indicating that the Peregrine building would take most of the vibration from the helicopters as they were taking off and landing. However, I would like to see a broader investigation which takes into consideration the effects of low flying helicopters on the specific local heritage residences in the close proximity.
3. The noise caused by helicopters flying low overhead will further reduce the amenity of the area and render the area almost unliveable during the allowed ten days. To consider, as does the Peregrine ER, that there is already similar noise at that level does their investigation a dis-service. There is not! Perhaps, occasionally a particularly loud vehicle will pass by but this is no-where near the equivalent of the continuous noise of a helicopter in close proximity.
4. The most concerning issue of all is risk to the safety and security of surrounding residents and workers. Helicopters crash at a greater rate than most other aircraft. Taking off and landing is when they are at their greatest risk of this occurring. An aircraft in trouble may not have any control over where it might put down in an emergency and I'm not at all happy that my house could possibly be where it does come down. Further, nominating school ovals as emergency landing options is irresponsible as it could compromise the safety of a large number of children. The risk is horrendous and I find it unbelievable that any-one could consider inflicting this risk on a neighbourhood; particularly when it is purely for the pleasure of a small number of people who do not even live in the area.

5. The issue of continued adherence to a nominated 10 day limit is also of real concern. The adage of “give an inch and take a mile” is pertinent to this. First Peregrine applied for a building. After that application was granted they started pushing for a helicopter landing pad. They have particularly nominated 10 days of usage of the landing pad, presumably because this is the maximum allowable limit within which they can be excluded from further EPA regulation. To ensure that the 10 day limit be maintained it has been muted that further conditions relating to this could be applied. However, I note from the NPSP Council Minutes that even if further conditions were to be applied to the 10 day limit, these may not be enforceable. How much further, then, will Peregrine push ?

In the presentations accompanying this Proposal, much has been stated about the extent of the contribution which the Peregrine Corporation has made to this State. This is well-understood and appreciated. However, this should not mean that they can ride rough-shod over other citizens of the State. Those residents and workers who are most likely to be affected by this Proposal have a right to expect that the amenity, safety and security of the area where they live and work should be enhanced as a result of new initiatives, not adversely affected.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.



homes, schools, businesses, churches and other gathering places of Kensington and Norwood. **Landing and take-off are the highest risk phases of helicopter flight**, as actually stated in Peregrine Corporation's Public Environment Report (Appendix D, Aviation Specialist Advice Report, page 8 of 26), therefore Peregrine Corporation's joy flights are statistically most likely to go wrong in the suburbs surrounding 270 The Parade.

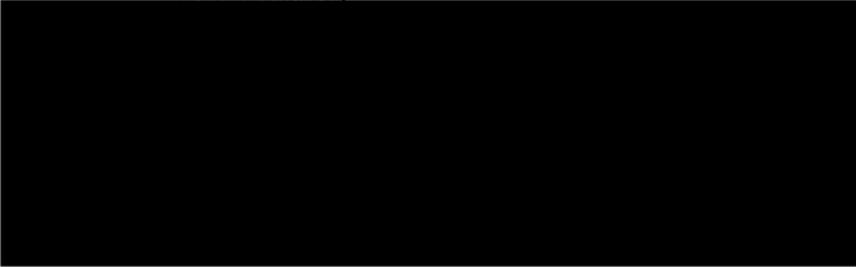
**Distraction of drivers using Portrush Road and The Parade is another major risk factor.** As helicopters descend from the sky or rise up suddenly, multiple drivers are likely to be distracted simultaneously with potentially fatal results.

I work in the mining industry. We use a tool called a Risk Assessment Matrix to define and manage safety risks by considering *Likelihood* and *Consequence* together. I would say that the likelihood of an accident being caused by helicopters landing and taking off repeatedly from 270 The Parade is *possible* or perhaps *unlikely*, but the consequence of such an accident would be *catastrophic* with potentially multiple injuries or fatalities. This places the activity in a *high-extreme* risk category and the only way to control the risk is to eliminate the helicopter activity.

**The proposed helipad at 270 The Parade is a mechanism designed to further the ambitions of Peregrine Corporation. The community will bear all the safety risk and, in addition, will need to tolerate the excessive noise and vibration generated by the helicopters. Please don't sacrifice the safety and needs of the broader community to satisfy one corporate entity.**

I am relying on your good judgement, [REDACTED]. I am relying on [REDACTED] and Chapman promoting the needs and safety of their electorates. I ask that you wholly reject Peregrine Corporation's application to include a helipad within their development at 270 The Parade.

Yours sincerely



[REDACTED]  
Kensington SA 5068  
[REDACTED]  
[REDACTED]

12 March 2020

[REDACTED]  
Minister for Planning

**Electronic**

[REDACTED]  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

Dear Sir

**270 The Parade Kensington Peregrine Corporation Helicopter Landing Facility Proposal**

We write to you to express our strong objection and opposition to Peregrine Corporation's proposed Helicopter Landing Facility (**Helipad**) at 270 The Parade Kensington (**the Site**).

**Our Family Home and Neighbourhood**

We have lived at [REDACTED] Kensington with our two children for approximately 5 years. It is our family home which we have renovated and our principal investment. We plan to live here for many years to come.

The Kensington area is a generally quiet family neighbourhood frequented by many families on a daily basis where children attend schools and kindergartens in close proximity to the Site such as Mary MacKillop College (10/14 High Street, Kensington), St Joseph's Memorial School (46 Bridge Street, Kensington), Marrayatville Primary School (Dankel Avenue, Kensington) and McKellar Stewart Kindergarten (17A Regent Place, Kensington). There is also the Mary MacKillop Precinct (4 High Street, Kensington) and the Clayton Wesley Uniting Church (280 Portrush Road Beulah Park) immediately to the south and the north of the Site respectively.

**Basis for Opposition and Objection to Helipad**

We strongly object to and oppose Peregrine's Helipad proposal for the following reasons, in order of priority from highest to lowest:

- 1 safety;
- 2 noise; and
- 3 inconsistency with the surrounding use of the land.

### Safety

We consider that the landing and taking off of helicopters at the Site is dangerous to adjoining residents, students who attend the schools referred to above and visitors to the neighbourhood. In particular we refer to the following specific issues:

- 1 the loss of life should there be a helicopter crash in the vicinity of the Site has the potential to be severe given:
  - (a) the close proximity to the Site of the schools referred to above and the neighbouring apartments directly opposite the Site on the corner of Portrush Road and the Parade; and
  - (b) the large amount of traffic that uses Portrush Road and the Parade on a daily basis;
- 2 helicopters are susceptible to mechanical issues and are difficult to control in the event of an emergency;
- 3 helicopters account for around 25% of all general aviation accidents which is disproportionately high given the number of helicopters in service;
- 4 we would be personally concerned for our own safety and that of our family should Peregrine be permitted to land helicopters approximately 300 metres from our house;
- 5 there are a number of large buildings in close proximity to the Site including the apartments across Portrush Road from the Site and the Clayton Wesley Uniting Church, which increase the risk of an accident; and
- 6 given the adjoining land uses to the Site, there are limited safe spaces for an emergency landing (should the pilot be able to control the landing) noting that a school oval with children present is in our view an inappropriate emergency landing area.

### Noise

We further consider that the noise of the helicopter on the planned days of operation would be disruptive and would reduce the amenity of living in an otherwise quiet neighbourhood. In particular the proposal that there would be up to 8 trips (or 16 take-offs and landings) per day on the planned days of operation would be oppressive.

We are conscious that helicopters are very noisy and it would also disturb our pets.

### Inconsistency with surrounding land use

We consider that the construction and use of a Helipad at the Site in an area which is primarily used for residential, educational and religious purposes is fundamentally flawed. We confirm that Kensington is a historic conservation zone that has a number of historically significant sites.

### **Basis of Application for Approval**

We consider that Peregrine's stated grounds for seeking approval to operate the Helipad are manifestly insufficient to warrant approval being granted in circumstances where there are compelling reasons why the application should not be approved, as referred to above.

The desire for swift transportation from Peregrine's headquarters to its other facilities and other localities benefits only a small number of individuals in circumstances where there are a number of feasible alternatives including using the regulated, controlled and purpose built facilities at the Adelaide Airport which are only 15 minutes from the Adelaide CBD and 25 minutes from Kensington, arrange for visitors to fly direct to other regional airports or drive to these locations, which in the case of the Bend Motorsport

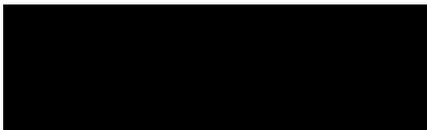
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Park (one of the Peregrine's nominated destinations) is only one hour's drive from Adelaide<sup>1</sup> . We do not accept that the provision of approval would generate any economic benefit for the State.

**Conclusion**

We submit that the Peregrine Corporation's application for approval to use a Helipad at the Site should be refused for the grounds referred to above. There is no justification for the proposal, only significant downside, risk and adverse consequences of the most significant magnitude.

Yours faithfully



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Minister for Planning

[REDACTED]

DPTI

GPO BOX 1815

ADELAIDE SA 5000

[REDACTED]

Dear Minister

I strongly oppose the Peregrine Variation2 : Helicopter Landing Facility.

I am a local home unit owner in [REDACTED], Hazelwood Park SA, who cares about our tenants and I am also a father and grandparent of a family living in Kensington Park and wish to state my serious concerns.

The concerns specifically are:

1. Which independent authority would ensure accountability of Peregrine to comply with the 10 days per year limitation and how would the public check on this?
2. The length of time that noise levels would remain high for a helicopter to approach, hover, land, shut down then prepare to start up and take off again. This total time could be repeated 8 times on all 10 days per year.
3. What is the second landing pad intended for?

There is no reference to its purpose in the PER. The proposal for 2 helipads has future capability to significantly increase the number of flights. Again which authority would monitor/ ensure compliance regarding days of use ?

4. There are very few helipads located in medium density residential areas near Adelaide's CBD within a 5Km radius for very good reasons!!
5. How would the general public be notified of intended days for the helipad's use because there are significant implications for the likes of students sitting for exams, weddings, funerals in nearby churches and other school, sporting and community events.
6. Significant helicopter noise would be a distraction for the multitude of drivers travelling along the main arterial roads which have been cited as 37,200 vehicles a day. (Appendix p.410) many of which are heavy vehicles.
7. Helicopters, as are all aircraft, are more accident prone at take-off and landing, which is a significant fact considering the concentration of schools, shopping precincts, medium density

housing and traffic in the area of the helipads. The implications of such an accident are horrific to think about!!

8. I note that in an Appendix K Fyfe acknowledges that the Helipad Landing Facility

“ is not expected in its own right to have an economic or employment impact on the Norwood and Kensington Precincts”.

In fact, local residents would actually lose amenity and have no benefits, if this proposal is allowed to go ahead.

9. I am horrified at the idea of emergency landings at any school oval , especially my own grandchildren’s schools.

As a local property owner, and grandparent of children living, and attending schools in Kensington, I strongly oppose the invasion of local amenity , public spaces and quality of life and lifestyle, which the use of a helicopter pad/pads in this sought after family friendly neighbourhood would have to endure. Real Estate values could also be affected because of the area being less desirable to live in.

According to the ABS 2016 Census, there are 10,000 local residents living within a 1 Km radius of the Peregrine site in question who would be impacted . That is a significant number of people with properties with significant real estate value. Meanwhile the Helipad facility would only provide benefits for Peregrine’s own private purposes and business interests. Where is the justice and commonsense in that?

I sincerely hope that the concerns raised by me and others will be given the serious consideration they deserve and that a hasty, poor decision is not agreed to .

Yours Sincerely

[Redacted signature]

[Redacted contact information]

[Redacted contact information]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 6:39 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Fwd: Peregrine's private airport proposal\_impact on Kensington's vitality

[REDACTED]

I am writing in protest to Peregrine's helpads application and appealing to your custodial responsibility for the future cultural life of Kensington (and beyond).

Peregrine is seeking to install a private airport in the suburbs.

This may raise horrendous legal issues of trespass of private airspace as well as conflicts arising from the Local Government's breach of their wellbeing obligations under the South Australian Public Health Act 2011, but that's for the lawyers - my concerns are cultural.

The term culture is derived from the Latin word 'colere', meaning to inhabit, to cultivate, or to honour. It is described by UNESCO as "a set of distinctive spiritual, material, intellectual, and emotional features of society or a social group, that it encompasses, in addition to art and literature, lifestyles, ways of living together, value systems, traditions and beliefs."

Culture is increasingly recognised globally as essential in strengthening belonging, vitality and social cohesion, driving economic growth through innovation and tourism, as well as shaping city identity. There are many reasons that make Kensington one of the most beautiful and culturally rich neighbourhoods to live in Australia, and I'd like to share some of the stories of this place.

Firstly, to acknowledge that it is built on an ancient place, as the home to over two thousand generations of Kurna people thriving sustainably and nurturing the land and creeks for some 60,000 years.

Around 1500 neighbours now live here from all corners of the globe; around half rent their property, while others seek to own. There is a rich mix of dwellings, multi-story apartments, houses and old

workers cottages. There are two kindergartens, three schools, two pubs, an iconic outdoor public swimming pool and one of Australia's most biodiverse urban parks – planted, mulched and nurtured by the residents of Kensington.

None of what exists here is an accident. It emerges from a myriad of connections and interactions between people and place.

Being a good neighbour is a delicate dance. It requires trust, respect and a sense of shared values. Kensington is comprised mostly of strangers, but many of us here know, and even like each other - our children grow up knowing each other, young teenagers babysit neighbours children, learn to cook pizza in each other's backyard wood ovens, share home harvested honey and other produce, support each other's garage sales and children's stalls, occasionally get together to share a cup of tea or a meal and even been known to protest together.

We care for each other and are kind to each other.

There are many young families here, many of who choose not to own a car and instead walk or cycle to their work – not for financial reasons but committed to their custodial responsibility for this planet, so we carpool and even lend each other cars when needed or when away on holiday.

Many families have very modest needs and little desire to accumulate assets and wealth, so give back to the community in a myriad of ways, including through philanthropy and volunteering.

We nurture this place every day.

The Peregrine helipads represent the opposite.

The helipads represent greed, arrogance, power, exclusiveness. Beyond the terrible noise pollution, there will be an impact on the wildlife and local biodiversity, but worst of all will be the impact on the safety of the residents, including our children sharing their repurposed playgrounds as emergency landing sites

The moral and values conflict will impact on people's wellbeing. It will erode trust, belonging and dignity. It will damage the unique and remarkable ambience and mood of this place.

It is also unsustainable.

In the past 200 years, we have removed half the trees on earth, exploded mountains in search of coal, contaminated the waters to extract oil, produced materials and plastics that pollute the oceans and release carbon dioxide into the atmosphere at rates that change the climate, warm the planet, melt ice-caps and cause sea levels to rise. Plants and animals are becoming extinct at twice the rate prior to human existence.

Climate change, pandemic disease, poverty and civil unrest have become ubiquitous global issues. Inequality is growing; the world's eight richest individuals have the equivalent wealth as the poorest half of the world's people – almost 4 billion individuals.

All in the quest for money and power by large corporations including Peregrine.

If there is any wisdom to be gleaned from the recent devastating events of bushfires, floods, pandemic disease and subsequent economic turmoil, it's the global realignment towards sustainable development that is good for people and the planet.

Peregrine's helipads represent the opposite.

I sincerely urge you to reject this aggressive and self-serving submission as an act of respect for the dignity of those contributing everyday to make Adelaide and South Australia an extraordinary place to live in the world.

Yours sincerely

██████

██████████  
██████████

████████████████████  
████████████████████

[REDACTED]  
Kensington 5068

13 March 2020

The Minister of Planning  
[REDACTED]

Department of Planning Transport and Infrastructure

GPO Box 1825

Adelaide SA 5001

Dear Sir

Re: Peregrine Corporation Helicopter Landing Facility 270 The Parade Kensington.

Further to my recent submission in opposition to the proposed helicopter landing facility at the Peregrine building at 270 The Parade Kensington, I submit that if one land owner is entitled to establish a helipad and helicopter operation on their property then it is surely a precedent and arguable that other land owners in the area ought to have the same right. That notion is of course absurd in consideration of air safety issues and underpins the fundamental reason why aircraft operational bases are confined to only a few locations in the metropolitan area and substantially removed from built up areas.

Thank you for your consideration of my submissions.

Yours sincerely  
[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 7:39 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Helicopter Pad in Norwood

[REDACTED]

I adamantly oppose the proposed helicopter pad on the corner of The Parade and Portrush Rd and please I want my opposition noted.

As a Norwood resident I use the intersection often collecting my grandson from nearby childcare. With a mix of traffic including speeding long trucks it is already a very dangerous intersection and I have seen many near miss accidents. The noise from helicopters would add further to this dangerous intersection with heightened noise distraction.

Further sitting opposite the old Clayton church a Norwood icon, a helipad would clash with the heritage aspect of the precinct although I know that sadly heritage value is no longer an important consideration these days.

I would hope that the widespread opposition to this development is considered in processing the application.

With thanks

[REDACTED]  
Norwood

**Peregrine Mixed Use Major Development Variation 2 – Helicopter Landing Facility**  
**270 The Parade Kensington 5068**  
**Public Environmental Report**  
**Public Consultation**

**Guidelines - Public Environmental Report**

The issues that arise from the Mixed Use Major Development Variation 2 Proposal (Proposal) for the construction of a helicopter landing facility have been determined by the State Planning Commission as representing issues or opportunities.

The Proposal may well represent an opportunity for the Proponent. It raises only issues for the local community and residents and will result in adverse impact on residential amenity, and the heritage context of the immediate locality, the suburb of Kensington specifically and nearby residential neighbourhoods more broadly.

The issues and their impacts are classified by the State Planning Commission as “standard”, “medium” or “critical”, each requiring a level of risk assessment according to the respective classification. The Guidelines issued for the Public Environmental Report (PER) identify only two issues as “critical” – Aviation Operations and Neighbourhood Interface. One might have expected given the nature of the Proposal – a helicopter landing facility in a residential suburb – that more issues would have been identified as “critical” for assessment purposes.

It is submitted this has meant that certain issues have not been given due weight in the PER, with some reliance placed on aspects of technical reports prepared for the original development application for redevelopment of the proponent’s office building. The heritage context of the Proposal on State Heritage Items in the immediate locality centred on the Portrush Road/The Parade intersection, and on the suburb of Kensington as a Residential Historic (Conservation) Zone is the foremost example.

**Subject Site and Locality - Kensington Residential Historic (Conservation) Zone**

The suburb of Kensington is predominantly residential, and designated Residential Historic (Conservation) Zone under the Norwood Payneham and St Peters Development Plan. Several areas are zoned Mixed Use Historic (Conservation) Zone. The Proposal falls within that part of Kensington designated Business Zone. All Mixed Use zones and the Business Zone are on the boundary of the suburb on major roads, either Portrush Road or The Parade. Current activities in these zones impinge less on residential amenity than if the zones were located entirely within the suburb. In addition, there are four schools in the actual suburb within discrete Community Facilities zones. The Proposal is incompatible with the overwhelming residential make-up of the suburb, and is not in keeping with its designation as a Residential Historic (Conservation) Zone due to its significant heritage character.

**The Proposal**

It is difficult to understand how the helicopter landing facility is associated with the approved use of the building as an office. The PER variously states the Proposal is:

- *required to assist Peregrine in the efficient conduct of its business operations from its (to be constructed) headquarters and the Taillem Bend Motorsport Park Complex (p8)*
- *ancillary to the previously approved Peregrine Headquarters redevelopment... (p36)*
- *an integral component of the overall redevelopment of the headquarters site... (p39).*

If the Proposal was required to assist the proponent in the efficient conduct of business operations from its office headquarters, a helicopter landing facility would have been part of the original development application.

The Proposal is not integral to the approved development of a redeveloped office building. The sought-after experience of helicopter travel to and from Kensington has little connection with an office building from which the proponent conducts its business operations.

The Proposal is incompatible with the adjacent and neighbouring residential suburb(s) for reasons of residential amenity and heritage context, in addition to the safety considerations associated with helicopter movements (landing, take-off and flight).

Further, the claimed flow-on effect to the South Australian economy derived from the pleasurable experience of helicopter travel to transport the proponent's interstate and international guests to Tailem Bend MotorSport Park is tenuous. The need for quick accessible transport being paramount to ensuring a pleasurable experience for overseas and interstate business guests is about hospitality and not related to, nor required, for the use of the redeveloped building as office premises. It is less about the efficient conduct of the proponent's business operations, and more about a desire to provide what is perceived as a convenient mode of travel to, and associated hospitality at, Tailem Bend Motorsport Park.

If the Proposal complies with the helicopter landing facilities at hospitals (PER p18), then perhaps it is better sited at one. Perhaps Lot 14 (the site of the former Royal Adelaide Hospital) could accommodate a helicopter landing facility as it did when the hospital was located there. If the Proposal is to be an economic driver for the State as contended, perhaps the helicopter landing facility could be incorporated into the ongoing development of Lot 14 which is envisaged as a driver of the State's future economy in a number of high tech industries. Perhaps motor sport could be added to that number.

### **Aviation Operations**

The Guidelines identify the proximity of the site of the Proposal to residential development, educational, communal and public facilities, businesses and major arterial roads (Guidelines p9). From a safety perspective, a helicopter landing facility would seem inappropriate in close proximity to the major roads of Portrush Road and The Parade, the retail/commercial hub centred on Norwood Parade and adjacent and nearby residential neighbourhoods.

The identification of emergency landing sites, while part of the risk assessment of the Proposal, would suggest there is inherent risk in the operation of a helicopter landing facility and consequent helicopter movements in the vicinity. The fact that all but one of eight emergency landing sites are school grounds gives rise to a separate concern for the safety of those school communities.

The Proposal is, in fact, two helipads, the second one for emergency purposes only, and variously described in the PER as a concrete slab. This only serves to heighten the issue of safety from helicopter movements within the neighbouring residential areas.

That is why helicopters invariably land at airports which are purpose-built for aviation operations.

### **Neighbourhood Interface**

The Proposal has wider implications than at the Bowen Street and High Street interface and proximity to "neighbouring residential development, nursing home facilities, educational, communal and other public facilities" (Guidelines p9). Helicopter operations mean impacts (vibration, noise) are not confined to the interface with the immediate locality. Helicopters will be over residential suburbs. Helicopter movements at low altitude will have adverse impact on residential amenity in the predominantly residential suburb of Kensington, and neighbouring residential suburbs. The impacts are not limited to the interface in the immediate locality.

The assessment of the impact of noise is limited to the immediate locality (with an exacerbation of existing traffic noise impacts (Traffic Noise Assessment, Resonate acoustics) on the Tappeiner Court Nursing Home currently under refurbishment) and does not take sufficient account of noise beyond nearby land uses. The approach to assessment is based on taking "all reasonable and practical measures to minimise noise" (Appendix M) on the premise the *Environment Protection (Noise) Policy*

2007 does not apply. It is proposed that noise will be minimised by the location of the helicopter landing facility “near the centre of the roof of a 7 storey building but also allows the edge of the building to block line of sight (and therefore reduce noise) between the closest residences and a helicopter on the helipad” (Appendix M p7). This measure considers only the use of the helicopter landing facility and not noise generated by helicopter movements over the suburb of Kensington and neighbouring residential suburbs. What of the impact of noise on residences that have an uninterrupted line of sight between them and a helicopter on the landing pad?

## Heritage Context

The Proposal is at odds with the immediate locality of the Portrush Road/The Parade intersection within which are situated five State Heritage Items.

Further, the Guidelines (p10) require it be shown how the Proposal respects and responds to the adjacent Residential Historic (Conservation) Zone.

The issue at hand is not the previously-approved development application for a redeveloped office building on the existing site within the Business Zone. The Proposal is for a helicopter landing facility to permit the operation of helicopters within a residential suburb. Yet the PER quotes from the Heritage Impact Assessment (HIA) on the original development application as follows:

*Local heritage impacts are largely negligible with only two adjacent Local Heritage Places, both of which are remnant former residential dwellings.*

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

*Impact on the residential amenity and character are limited to Bowen Street...*

The heritage context as it relates to the Proposal is not given due weight. The Proposal has wider implications than the interface with the adjacent the Residential Historic (Conservation) Zone at Bowen Street and in the vicinity of the closest two Local Heritage Places on High Street. The Supplementary HIA commissioned for the Proposal states:

*The most notable change to the original proposal is when viewed from the east (looking west down High Street, Figure 14 and Figure 15). While this vantage does enable views of the rooftop changes, such views are inconsequential to any heritage impacts...*

The rationale for this position is that there are no heritage places within the context of these views (Appendix I Figure 15) and limited views of changes to roof top level setback from Bowen Street or the Contributory Items there.

This is a limited perspective, which accounts for the interface with the Residential Historic (Conservation) Zone at Bowen Street and the closest Local Heritage Places in High Street, but not the Zone as a whole. In fact, the entire northern side of High Street from Phillips Street to Maesbury Street is comprised entirely of dwellings listed as either Local Heritage Places or Contributory Items (other than the premises on the north-eastern corner of Thornton Street). In addition, the southern side of High Street, the eastern side of Thornton Street (to the south of High Street) and Richmond Street contain numerous dwellings of similar built heritage status and are likely to enable views of the rooftop changes comprising the two helipads of the helicopter landing facility. Views of the changes will also be possible from numerous other vantage points within the Zone.

The Supplementary HIA does not recognise the heritage context of the Residential Historic (Conservation) Zone in its entirety. The Supplementary HIA limits the heritage context to the immediate interface at Bowen Street and the two nearest Local Heritage Places.

## Economic and Employment Impacts

The helicopter landing facility is not essential to the growth of the proponent's business. The Fyfe report (Appendix K) concludes there will no further economic contribution or impact on the Norwood and Kensington precincts beyond the already-approved redevelopment of office premises. In addition, the Fyfe report finds no significant local or broader job creation will result from the Proposal per se.

The creation of the anticipated 600 jobs in the construction phase will occur with redevelopment of the proponent's office premises in any event. Construction jobs are not dependant on the Proposal.

The Fyfe Report concedes there are no discernible economic or employment benefits or opportunities for the local area that result from the Proposal.

The helicopter landing facility does not create additional employment, nor of itself create discernible economic benefits for the State.

## Development Plan

In accordance with the Kensington Policy Area 6.7 the Business Zone planning requirements include:

*3 Development within the Business Zone should not include land uses which by their operation will adversely affect the amenity of the adjacent residential areas*

The Proposal will have an adverse effect on the residential amenity of Kensington as a Residential Historic (Conservation) Zone and surrounding residential areas. Given the operation of helicopters from the proposed land use as a helicopter landing facility, the Proposal does not comply with development in the Business Zone as, by the very nature of helicopter movements, there will be an adverse effect on surrounding residential areas. The effects on residential amenity will not be confined to the immediate locality. Helicopters will be over residential areas resulting in increased noise, disruption and distraction. The implications of the Proposal are not confined to the immediate locality, nor the interface with the Residential Historic (Conservation) Zone. It is the impact on the entire suburb as a Residential Historic (Conservation) Zone and the integrity of its substantial heritage character that is fundamentally compromised, along with the amenity of surrounding residential areas.

It is submitted a helicopter landing facility to permit helicopter movements (landing, take-off and flight) in, and over, residential neighbourhoods creates impacts that are on balance not acceptable.

  
Kensington 5068

[REDACTED]

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**From:**

**Sent:**

[REDACTED]  
Friday, 13 March 2020 9:29 AM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

Re: Opposition to a helicopter landing area in Kensington for private use.

[REDACTED]  
**Mister for Planning**

**As a concerned Adelaide citizen I oppose the helicopter pad application and want my opposition noted.'**

**Kind regards**



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name .. [redacted] [redacted] [redacted]  
Telephone ..... [redacted] ..... Email ..... [redacted]

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other

*Principal of Marryatville P.S., representing the school community.*

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

*I support the concern of my school community, who live in close proximity to the proposed development. Their quality of life will be compromised.*

*I am strongly opposed to the Marryatville P.S. oval being proposed as an emergency laydown area. It is not suitable due to power lines and the volume of students frequently using this space. Placing students at potential risk is not acceptable.*



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

*The proposed helicopter landing facility not being approved.*

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

[REDACTED]

Department of Planning, Transport and Infrastructure

GPO Box 1815

ADELAIDE SA 5000

[REDACTED]



Government of South Australia

Department of Planning,  
Transport and Infrastructure

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 10:35 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine Helipad - Strongly opposed

Minister for Planning.

I strongly oppose allowing the Peregrine Corporation to vary their development application to permit a Helicopter Landing Facility on the roof of the approved building at 270 The Parade, Kensington.

Helicopters are involved in around 25% of all general aviation accidents even though they only account for 14% of the Australian VH-Registered fleet as per Aviation Occurrence Statistics 2008-2017

an extract from a simple query on helicopter safety ..

*"Do helicopters really crash more often than planes? Yes. Helicopters crash at a slightly higher rate than aircraft overall, according to data collected by the National Transportation Safety Board. General aircraft—airplanes, helicopters, balloons, blimps, and everything else—average 7.28 crashes for every 100,000 hours of flight time. The crash rate for helicopters alone is 9.84 per 100,000 hours. That means helicopters crash about 35 percent more often per hour in the air than your average aircraft"*

Jim Crouse of Crouse Law Offices, J.A. Donoghue of the Flight Safety Foundation, Mark Fontenot of Bristow Group, J. Heffernan of Helicopter Association International, and Ted Lopatkiewicz of the National Transportation Safety Board.

The public environment report indicated that 6 of the 7 listed "viable options" during catastrophic engine failure are local school ovals.

When can school ovals, with the safety of hundreds of children put at risk, be a "viable option"

Surely the egotistical desires of one man/company to reduce their travel time on "no more than 10 days per year during daylight hours" should not seriously be considered against the safety of the entire community surrounding the building and proposed landing site

We have an airport for good reason - its a controlled environment - and that's the facility the Peregrine Corporation should use.

Thank you

[REDACTED]

Kensington resident

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 10:56 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine Mixed Use Major Development –Variation 2 Helicopter Landing Facility

# Major Development Proposal

## Peregrine Mixed Use Major Development –Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation TELL US WHAT YOU THINK  
Submissions will be made publicly available and will be included in the proponent’s Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name .. [REDACTED] .....  
Address [REDACTED] .....  
Telephone. [REDACTED] .....  
Email .. [REDACTED] .....

**What is your interest in this proposed development?** Concerned citizen who now lives under a flight path that has been moved and changed and grown with no consultation or warning.

**What is your overall position on the proposed development?** I oppose the development

**Do you have concerns regarding the proposed development?** Yes many

Much of the beauracrats and experts information about noise impacts from aircraft are blantly misleading and what people are expected to put up with is very unreasonable. For 35 years I have lived at my location and for 30 of those years I had no planes flying anywhere near my home. However in January 2015 someone decided to no longer follow the agreed flight path and instead fly the planes closer to my home. I put in an objection in October 2015 and was told a whole lot of rubbish about an experiment in Heathrow that would bring planes in at a higher angle and reduce the noise. I never heard another thing about it. Late in 2019 someone again moved the flight path with no indication that this was to be done and also decided that the planes would descend at a much lower height. I now have very noisy planes flying mostly directly over my home and very low so they are very noisy and they are constant day and night. They have had a significantly negative impact on my health and mental health. What I have learnt from this is that noone cares about the impact of aircraft flying over your home or how bad the impact is. What I have also learnt is that beauracrats constantly change the rules in relation to aircraft with the public having no say about it at all. Lives can be

ruined by some beauracrat making arbitrary decisions. I believe this will happen to this application should it be approved.

This does not bode well for the helipad application for the people living around the Peregrine development as it is very clear that the owners will want their helicopters to be flying much more frequently than 10 days a year. At the moment they are applying for the least amount of days to have an application that is most likely to gain approval. If this application is approved I have no doubt they will later apply or pressure to have the number of days on which they can fly extended until it is allowed to happen on a weekly basis in order not to have to spend time travelling to work and to Tailem Bend. We were told at the meeting that one of the owners has a helipad at his home.

While the Sonus report claims noise will not be a problem, I understand that separate investigation by Norwood, Payneham & St Peters Council cites BlueSkyRotor.com evidence that Peregrine's 3 proposed helicopters would have 'noise at takeoff limit' levels ranging from 92-94dB(A) – more than FOUR times louder than average daily background noise and lasting considerably longer than any thus far recorded 'spike' when comparing it to the traffic noise. The resulting noise would be highly disruptive/intrusive for nearby residents.

Having noisy aircraft fly over or near to your home is very disruptive to individuals health and well being especially when it is constant. This would be constant as it would be with landing and taking off at the Peregrine site. This is basically a residential area which is not suitable for helicopter flight paths. It is also very polluting for residents as a result of emissions from the helicopters which will add to the traffic pollution already present from Port Rush Road and Norwood Parade.

I also have concerns about the potential negative impact to surrounding buildings despite the Sonus report. I was told by a DPTI employee that there were problems with the helicopter at the new Royal Adelaide Hospital site blowing out the windows of surrounding buildings. I am not sure if and how this has been resolved but I am concerned that a constant stream of helicopters on a day to and from this Peregrine site would place the Clayton Wesley Uniting Church at high risk of damage to the stained glass windows and spire and that the impact of the rotor blade down wash on neighbouring buildings would place them all at risk of damage to windows. These buildings are much closer to the Peregrine helipad than the surrounding buildings are to the helipad at the RAH. What also if wind conditions result in a helicopter having to hover near these other buildings due to landing difficulties thus causing them to be damaged.

### **Safety**

Boeing research shows that **takeoff** and **landing** are statistically **more dangerous** than any other part of a flight. ... During **takeoff** and **landing**, pilots have less time to react to problems because they're on or close to the ground (helipad) and moving quickly. As they take off and land more often than planes this increases their vulnerability to accidents.

Private/business helicopters followed closely by recreational gyrocopters had the highest fatal accident rate for any aircraft or operation type,.....Australian Safety Transport bureau <https://www.atsb.gov.au/publications/2018/ar-2018-030/>.

Statistics for 2008-2016-7

Helicopters were involved in around one quarter of all general aviation accidents and fatal accidents in the 10-year period, even though they accounted for 14 per cent of the Australian VH-registered fleet and flew less hours than aeroplanes. Australian Safety Transport bureau <https://www.atsb.gov.au/publications/2018/ar-2018-030/>

### **Figure 5: Rate of accidents and fatal accident by operation and aircraft type**

Data sources: Bureau of Infrastructure, Transport and Regional Economics and ATSB's aviation occurrence database.

During the 10 year period the fatal accident rate for Business/private helicopters per 1 million flying hours was 30.4 and the accident rate was 208.4.

The fatal accident rate over the 2008 to 2016 period was highest for helicopters used for private/business operations followed by recreational gyrocopters.

Australian Safety Transport bureau <https://www.atsb.gov.au/publications/2018/ar-2018-030/>

I think it is too risky to residents to have helicopters landing and taking off in dense residential areas. One fatal accident would be one too many.

I also have concerns about the use of school areas as the areas to be used in the event of emergencies. I think this is totally unacceptable. I would not want my child to be attending a school that would be the emergency landing place if a helicopter got into trouble especially if it was recess or lunch time or after school sports practice.

I do not like Peregrines business slogan "We don't stop until we win." Sometimes it is necessary to lose because proposals are inherently wrong.

I think if the Peregrine organization really want their helipad they need to move their building to a more suitable site where the helicopters will not cause any noise or safety problems for residents or nearby buildings.

I am interested in moving to Kensington but will not consider it if this application is approved as I do not want to move from one flight path problem to another.

### **What could be done to address your concerns?**

Not approve the development or for the peregrine organization to move their building to a more suitable site.

The Minister for Planning  
[REDACTED]  
Unit Manager Policy and Strategic Assessment  
[REDACTED]

Dear Sir,

**Submission in response to Peregrine Corporation's Amended Development Application for construction and use of a Helipad at 270 The Parade, Kensington – Public Environment Report**

I am a resident of Kensington.

My house is located on the corner of [REDACTED], [REDACTED] [REDACTED]  
[REDACTED] [REDACTED] I consider that I will be amongst the most severely affected of residents, due to my close proximity to the proposed development site.

I am opposed to the revised application for some obvious reasons and as set out further in this submission.

I was opposed to the original development application and made submissions regarding the significant, adverse effects which the main development will have on the use and enjoyment that I have of my property, my personal well-being, the value of my property as well as impacts on the amenity of the area in which I have chosen to live for the last 19 years.

The revised application to include a helipad facility is simply to add insult to injury.

I repeat my original objections to this development as a whole and attach a copy of my original submission from 2016 to add context and background to this submission<sup>1</sup>.

**1. Development by Stealth**

- 1.1. It is of concern that the regulating authorities have allowed this significantly new development component to be treated as a variation to the original application.
- 1.2. This undermines the integrity of the approvals process by treating what would, in any other circumstances, be treated as a significant and controversial proposal to locate a

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<sup>1</sup> I understand that the Proponent is only obliged to address objections specifically related to the amended component of its application. As discussed later in this submission however, I would argue that in some specific areas such as noise, emissions and overlooking issues, the assessment of the variation proposal, in isolation from the main development, fails to address the *cumulative* consequences of adding a Helicopter facility to the site. I therefore specifically refer to, and seek to incorporate in this objection, commentary and objections from my previous submission on those points.

private airport facility in the middle of a quiet, suburban residential area, into a mere adjunct to an existing approval.

- 1.3. This incremental creep constitutes development by stealth.
- 1.4. It is fair to think that had this component been included in the original application it would have greatly increased opposition to the whole project and would have galvanised many who stayed silent at that time to voice their opposition.
- 1.5. The Proponent's approach is disingenuous and leaves the community with little comfort that an upscaling of the facility will not be the next step.

## **2. Uncertainty and Financial Impact**

- 2.1. I note with concern that the submission of this application has either stopped the clock or possibly reset the clock on the time period allowed under the original approval for the proponent to commence construction of the main development. The answer to the question on this point, posed to the department at the public meeting on 28 February 2020, was unclear
- 2.2. For those in the community who are trying to plan their lives to minimise the chaos and misery that this development will bring, this added uncertainty about if and when this monstrosity will start, and what form it will eventually take, is intolerable.
- 2.3. I seek a specific response from DPTI as to the following:
  - (a) If the amended application is not approved, how will the term of the current approval be affected?
  - (b) To what extent is the Proponent required to inform anyone outside of government of their progress towards implementing approved development?
  - (c) What is the ability to further extend existing approvals periods?
- 2.4. My residence will be severely affected both during the construction phase and post completion. Those adverse effects would be increased significantly if the helipad is approved.
- 2.5. I have several options to consider: all of them equally distressing.
  - (a) I could try to sell my house and move away from the area.

I could expect that the value of my house will be significantly impacted, now not only by the approved development but by the potential approval of this variation and the uncertainty around the approval process and the long term impacts, if approved;
  - (b) I could consider buying further away from the development and try to find a tenant who doesn't mind living next to a construction site for up to 2 years, then next to a looming tower overshadowing and overlooking the private outdoor areas of the house and now, potentially, to be overflowed by helicopters up to 160 times a year.

Again, even if a tenant could be found, the rental value of my property, which has already been significantly undermined by the approval of the main development, will be further devalued by the potential for this proposal to be approved.

(c) I could stay put and endure all of the above, seeing my place of peace and refuge turn into a dark, noisy, noisome prison.

2.6. Whichever path I choose a decision would need to be timed carefully. With no certainty as to when, if and in what form the development will proceed, I am unable to make rational decisions that will minimise the personal and financial detriment caused by the Proponent's plans.

### 3. Noise

3.1. The suggestion, in both the PER and at the public meeting, that the increase in noise above existing background noise levels of the area will be insignificant is, frankly, insulting. Continual reference was made to the heavy traffic along Portrush road.

3.2. The use of maximum noise levels as a comparison and assessment tool in the noise assessment report may be "standard practice" as claimed by the consulting expert but is unlikely to lead to a realistic assessment of the actual noise and annoyance impacts on local residents actually living through these noise events.

3.3. The sound of heavy vehicles passing on Portrush road is indeed "loud" at times. As I do not directly face onto Portrush road, I am shielded to some extent from these sounds whereas, being almost directly under the proposed landing zone, I will be more immediately affected by the Helicopter noise.

3.4. In any event, these road traffic noise events can be heard for a matter of seconds as they pass by a fixed point. In contrast each helicopter take-off and landing lasts for a minimum of 3-4 minutes at a constant noise level which, at ground level at my location, is assessed by the Proponent as being between 90 and 100dB.

3.5. This is something between standing next to a lawnmower and a power drill for 3-4 minutes of continuous operation.



3.6. There has been no upper limit placed on the number of flights permitted. To make full use of the facility (which one assumes is a significant expense to the Proponent, both in its design, approval and construction costs and in ongoing operational expenses), it could be expected that Proponent will seek to maximise its use.

3.7. Even if there were only 2 flights (each constituting two "noise events" - one take-off and one landing), on each of the 10 allocated days, this amounts to 40 noise events across

the year and, a significantly greater number of noise events could reasonably occur-potentially upwards of 200. At 40 events per year, this equates to 2 -2 ½ hours of exposure to noise levels in excess of 85dB at which point permanent hearing loss can occur. At 200 events it would equate to 10 – 13 hours per year.

- 3.8. World Health Organisation guidelines for community noise, quoted in the Proponent's own Acoustic assessment report, state that:

*To protect the majority of people from being **seriously annoyed** during the daytime, the sound pressure level on balconies, terraces and outdoor living areas **should not exceed 55dB L<sub>Aeq</sub>** for a steady continuous noise. To protect the majority from being moderately annoyed during the daytime, the outdoor sound pressure level should not exceed 50dB L<sub>Aeq</sub> [Emphasis added]*

- 3.9. The Proponent's only response to concerns about the noise impact on amenity or health appear to be that: the background noise level is already significant therefore no-one has a right to be bothered about the Proponent adding to it.

- 3.10. This overlooks a number of salient points:

- (a) For each increase by 10 dB, the intensity of sound goes up by 10 times. The impact of only a small increase in dB can therefore take a noise from a minor background disturbance to being a severe irritant and potential health hazard.
- (b) Traffic sounds from Portrush road may be more frequent in number but each event is of significantly shorter duration (and I would argue less intrusive) than a single Helicopter flight.
- (c) While the noise from Portrush road has increased moderately over time, it has been a busy thoroughfare for a number of decades. Those living next to it chose to accept the noise factor. Any detrimental effect or perceived detriment was incorporated in the value (both in monetary terms and in amenity) of properties bought in this location. When Portrush road was widened, (c2001), which did result in an increase in traffic, the State Government funded those properties fronting Portrush road to construct soundproofing fences and walls.
- (d) No-one in the Norwood / Kensington area elected to live next to an airport. In fact, they paid a premium on their house properties for the privilege of *not* living next to an airport.

#### **4. Safety**

- 4.1. The potential for a catastrophic event on take-off, landing, approach and/or departure is a serious concern, given my extreme proximity to the development and the fact, acknowledged in the PER, that take-off and landing are the most dangerous times.
- 4.2. The suggestion that there are plenty of emergency landing spaces "nearby" (almost all of which happen to be school grounds), is of little comfort.
- 4.3. The fact that the Government is even entertaining an application to locate an aircraft facility in the middle of a residential zone, abounding with schools, churches and hotels where large numbers of people congregate, beggars belief.

- 4.4. One of the reasons for the establishment of specific landing and take-off zones for aircraft (ie an airport), is to provide a buffer zone to protect residential areas and the general public, not only from the noise of aircraft operation, but from the inherent risks associated with operating aircraft.
- 4.5. Airports also have comprehensive emergency response facilities available on site in order to be able to immediately respond to accidents and to minimise casualties caused by such events. Response times would be expected to be measured in a handful of minutes and the responders would be specifically trained to deal with aircraft disasters.
- 4.6. I seek responses to the following specific questions:
- (a) What level of emergency response does the Proponent suggest would be available to attend a helicopter crash in any of the nearby school grounds or worse – from my perspective – on top of my house?
  - (b) What are the estimated response times for emergency vehicles in peak hour traffic;
  - (c) Is it suggested that emergency response would be the responsibility of the Metropolitan Fire Services and/or State Emergency Services?
  - (d) If so, to what extent are they equipped to deal with aircraft specific disasters?
  - (e) Who will bear the cost of having State emergency personnel on standby for such an event; the provision of additional training, or employment of additional trained personnel that might be necessary and /or the cost incurred in the event of an actual disaster?
  - (f) Can anyone advise whether general house insurance covers property destruction by falling aircraft? It is entirely possible that the cost of insurance premiums for those living in the area could be increased to factor in additional risk associated with living in such close proximity to this type of facility. Who would be expected to bear this cost?
  - (g) Will it be a condition of any approval that the Proponent (if operating their own helicopter) and/or its helicopter service providers carry adequate and appropriate insurance and how will this be policed?

## **5. Emissions**

- 5.1. The information in the PER regarding emissions is unfortunately highly technical and I do not pretend to understand it.
- 5.2. What I do see is that my house lies within the innermost zones of the diagrammatic representation of emission levels. While the impacts of these various emissions may have been assessed as “within reasonable limits” or within “acceptable regulatory guidelines”, I will nevertheless be affected by emissions to one degree or another.
- 5.3. I note that the helicopter emissions assessment has been undertaken in isolation. There has been no attempt to look at the cumulative effects of the development, as a whole, including the increased traffic caused by the onsite carparking and the establishment of an above ground car park, interfacing directly with a residential area.

- 5.4. I previously raised questions about the level of emissions from the carparking facilities within the main development. Exhaust fumes from this facility are planned to be extracted from the car park area directly onto and over my property. I received no response to those previous questions.
- 5.5. I now ask that the Proponent be required to address the cumulative effects of emissions from **all** proposed activities on the site, in any response document.

## **6. Overlooking**

- 6.1. Overlooking and overflying (at low levels) remains a concern for me. This issue is addressed in a cursory, off-handed and insulting way in the PER document. Essentially, the Proponent suggests that passengers boarding and alighting from helicopters will only be on the rooftop for small amounts of time and will be too interested in their own affairs to look into neighbouring properties. The fact is however, that the privacy of my back yard will be further undermined by approval of this unwanted and unjustifiable proposal.
- 6.2. I note that between the first iteration of the development and this revised version, the internal configuration of the building has been quite substantially altered. This presumably occurred during the 2018 round of amendments which, as far as I know, were not the subject of any public consultation. It is suggested that Level 3 of the complex will now host a “café” and large terrace area facing east which directly overlook all outside private areas of my house and the front yards and bedroom windows of the other properties along Bowen Street. The distances are not depicted on any of the diagrams provided by the Proponent, but I estimate that people standing/sitting on this terrace will be between 25 and 30m away from me. This is significantly worse than the original plans which showed this level to be occupied by offices.
- 6.3. No information has ever been provided about how this café area will be operated. For example:
  - (a) seating capacity (internal and external)
  - (b) hours and days of operation
  - (c) whether it will be licenced
  - (d) whether it will be used for private, corporate and/or public functions
- 6.4. Will these issues be assessed / authorised at a Council level? Or, as part of a Major Development, will there be no specific regulation of these activities?
- 6.5. I have some obvious and reasonable concerns beyond the overlooking factor, including the potential noise and light disturbance from large numbers of people occupying this area at all times of the day and night.
- 6.6. I am at a loss to understand how this variation, which could have extremely significant impacts on the privacy and amenity of my property, and of others in Bowen Street, could have been approved without any form of consultation.
- 6.7. While I understand that the Proponent is only obliged to prepare responses to issues directly relating to the Helipad proposal, I raise these issues partly to point out the cumulative impacts of the development which have, when convenient to the Proponent,

been ignored in its PER. The loss of privacy caused by the originally approved development has been greatly exacerbated by the first variation and will be further affected by this second variation, if approved. I find this incremental and stealthy erosion of my privacy extremely distressing and the cavalier and dismissive attitude of the Proponent when addressing this issue, highly offensive.

- 6.8. I seek a specific response from both DPTI and the Proponent as to the above raised issues.

## **7. Detriment vs Benefit Assessment**

- 7.1. The assessment process is, as I understand it, one of considering and weighing up individual negative effects against the positive good which may be brought to the State as a whole, the community at large and/or the local community in particular.
- 7.2. Generally, the personal, financial benefit to the Proponent should not weigh heavily in the scales of public benefit. It would usually go without saying that a private development such as this would always be undertaken by a Proponent for financial gain.
- 7.3. All development changes the environment in which it is undertaken and, unless undertaken on a desert island, will adversely affect the rights of someone.
- 7.4. The role of the assessors is, or should be, to weigh the public good directly with the public detriment.
- 7.5. The Proponent's role is to demonstrate, **not** how the project will benefit itself, but how it will benefit the community in which it operates, whether that "community" be the Country, the State, people affected generally or those affected more immediately – or a combination of those.
- 7.6. However the word "community" is interpreted, I would argue that the Proponent has failed to demonstrate, and has largely failed to turn its mind to the question of, how a helipad in this location and for this purpose, adds to the economic benefit of the State or provides any other amenity or benefit to anyone other than themselves.
- 7.7. Even as far as the benefit to themselves, the Proponent has been shy of suggesting any concrete, financial benefit and has neither provided, nor suggested that it has undertaken, an internal business case analysis, weighing up the cost of constructing and operating the facility as against expected business return.
- 7.8. The failure to even attempt to provide this level of justification for the facility clearly suggests that it is a whim and a self-indulgence that the Proponent wants to pursue, simply because it can afford to and no matter the costs to themselves or to their neighbours.

## **8. Failure to meet criteria**

- 8.1. Guidelines 6 and 7 require that:
- (a) the proposal should make a positive contribution to the commercial functions of the Norwood / Kensington Park (sic) area; and
  - (b) the proposal should enhance job creation and foster ongoing employment opportunities..... resulting from the proposal.

- 8.2. In response to each of these assessment criteria the proponent openly acknowledges that the proposal, in itself, will **have no beneficial effects** for the economy or employment prospects of the local, or broader community stating variously that:

*“...the proposal would likely generate no further economic contribution or impact on the Norwood and Kensington Precincts...”*

*“...no significant local or broader job creation will result from the construction of the helicopter landing facility...”*

- 8.3. In terms of economic benefits to the broader community and the State, the Proponent relies on the same arguments which it used for the approval of the original development.
- 8.4. I submit that, if the Proponent intends to rely on the benefits argument used in the original proposal, the Helipad should have been included in that proposal. Instead the Proponent has sought the strategic advantage, (in terms of minimising overall opposition), of separating the two components of the development but still seeks to rely on the original benefits argument to support this secondary application.

## **9. Detriment to the Community of Proposal not being Approved**

- 9.1. The Proponent states on page 8 of the PER that “...*demolition and construction [of the primary development] is expected to commence early to mid-2020, for completion by late 2021.*” There is no suggestion in the PER that the main development is dependent on approval of the Helipad or that the Proponent will not proceed with the main development if the Helipad is not approved.
- 9.2. **In these circumstances, the consequences for the State of the variation not receiving approval would seem to be zero.** The benefits touted by the Proponent as flowing from the main development will not be diminished.
- 9.3. The Proponent describes the consequences of not receiving approval in the vaguest of terms, on pages 32 and 33. The question is treated in the most cursory of ways hinting at some unspecified and unsubstantiated level of impact on the company’s efficiency, continued growth and competitive advantage.
- 9.4. Nowhere in the PER does the Proponent seek to quantify these effects, or to demonstrate by specific example or business modelling how its operations, or more importantly, the State’s economic wellbeing, may be affected, to any measurable degree, if the proposal is not approved.
- 9.5. The Proponent merely suggests that its neighbours and the local community should bear the cost of the proposal, because the Proponent wants to provide a “*pleasurable experience for overseas and interstate business guests*”.
- 9.6. At the very least, the Proponent should be required to identify who or what type of visitors these may be and how it is suggested that use of the Helipad will sell investment in South Australia. No attempt has been made to provide a business case demonstrating the amount of public benefit which might realistically be generated by the proposal and which could be put in the scales against the demonstrated public detriment.

## 10. Keeping up with our neighbours

- 10.1. At various stages during the history of this process, the Proponent has made the argument that, if they are not allowed to proceed with their development in their preferred location, they could and potentially would, “take their business elsewhere”.
- 10.2. One hopes that the Proponent is not trying to resurrect this argument in relation to the Helipad.
- 10.3. Clear representations were made during the first round of proposals that the Proponent was prepared to invest \$50million in a head office, *without a helipad*. It cannot now say that the investment is not worth making if there is no Helipad.
- 10.4. Presumably the averred commitment to investment in the State, played a quite significant role in the Government’s decision to approve the original proposal, given how unsuitable that proposal otherwise was for the chosen location and how far outside development guidelines and community expectations it was.
- 10.5. If the Proponent now says that its commitment to this development is entirely dependent on this further approval, then it clearly misrepresented its intentions in the original application, bringing the validity of that approval into question. Alternatively, it raises the question of whether the Proponent originally applied without a helipad component, on a nod and a wink from Government that the helipad could come later, with little or no ability for objection.
- 10.6. If the Proponent is genuinely considering a move interstate, it might want to rethink that in light of the refusal of development applications made in recent years for privately operated helipads in both Sydney and Melbourne. Those applications were refused by local councils, largely on the basis of concerns around noise and safety and despite being made by persons of great wealth and influence, exceeding that even of the Shahin family.
- 10.7. Disturbingly, our Government has once again succumbed to the influence of the rich and powerful and taken this decision out of the hands of those who represent the interests of the local community. The PER acknowledges that, the rules for the assessment of this development were amended in September 2018 with the effect, and presumably for the specific purpose, of ousting the jurisdiction of the local council.

## 11. Desired Outcomes

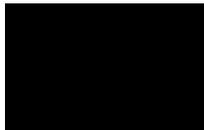
**I oppose this development and submit that the application should be refused. The Proponent has failed to demonstrate that the proposal will be of any benefit, to the local community or to the State as a whole. Identified adverse effects therefore patently outweigh any potential benefits. In fact, the Proponent openly acknowledges that there will be no benefits to local communities and fails to provide even a cursory argument substantiating benefit to the broader community.**

If the application is approved, I submit that conditions be attached including:

- a restriction not only on the number of days per year that the facility can be operated, but a restriction on the number of flights on any one of those days. Alternatively, there should be a restriction on the total number of flights per year;

- flights should not be permitted before 9am on weekends;
- any emergency response plan should address the matters raised under the heading "Safety" above and the Proponent should be required to make additional contributions to Emergency Services funding at an appropriate level and on an annual basis;
- the Proponent should also be required to:
o provide funding to retrofit all existing residences immediately affected by the landing site and the flight path with sound-proofing, such as double glazing and other insulating materials;
o fund any additional insurance premiums incurred by residences or businesses affected by the landing site and the flight path;
o compensate property owners for the loss in value / rental value of properties affected by the landing site and flight path;
o establish an email or text alert system and/or a website to provide advance notice to the public and neighbouring properties of planned days / hours of operation or establish other readily accessible mechanisms for providing this information;

Yours sincerely,



12 March 2020

2016 Submission Attached over page



This period complies to the letter with the *minimum* statutory requirements of s46D(5)(b) of the Act.

I submit that a minimum assessment level of a PER under s46C of the Act should be required for the Development given,:

1. the extent to which the Development deviates from the development plan (**DP**) for the Norwood, Kensington and St Peters Council (the **Council**) and, presumably also the DP for the Burnside Council area;
2. the extent of the materials contained in the DR and their technical nature;
3. the size and scale of the Development; and
4. its location immediately adjacent to
  - (a) long established residential areas;
  - (b) a Residential Historic (Conservation) zoned area;
  - (c) State Heritage listed buildings; and
5. the permanent and irreversible effects which the Development will have on its surrounds if approved and constructed.

In the alternative, and at the least, I submit that discretion should have been exercised by the Minister to extend the minimum notice requirements under s46D(5)(b) to a reasonable period similar to that provided for a PER or EIS process under the Act.

In light of the above matters (and all other relevant matters which the DAC is required under the Development Regulations to take into consideration), I query the basis on which the DAC could reasonably have determined the level of assessment to be a DR Process.

I request a specific response to this letter advising what materials and further justifications were submitted by the Proponent which led to this determination and information regarding the deliberations of the DAC in assessing the request for Major Project Status under the Act.

If necessary, it is my intention to seek access to this information under the *Freedom of Information Act (FOI)*.

### **Major Development Status**

I am aware that s46 of the Act is specifically designed to limit and/or cut off avenues of complaint, objection or appeal by individuals in respect of developments which are assessed as having a broader community and/or economic value to the State.

The power of this section to place “the good of the many, above the good of the few” comes with a heavy onus on both the Proponent and the State to weigh up competing interests and establish, with reasonable certainty, that the benefits will indeed outweigh the costs.

I have seen little in the DR in the way of objective assessment of the broader economic or social benefits of the Development as against the cost in both monetary terms and more

ephemeral, (but equally valuable), concepts of loss of character, history and amenity to the Kensington area and surrounding suburbs.

The Peregrine Corporation and its owners the Shahin family are well known as entrepreneurs and one of, if not the largest private employers in the State. One could however say that the organization is not only known for but also *notorious* for its employment practices. No doubt the company takes care to ensure that its practices fall within the letter of the law, but their public reputation is hardly that of good corporate citizens.

To what extent has DAC or the Minister made investigations into the public standing and corporate background of the Proponents?

Other than the obvious and direct economic benefit of a construction project of this size including, the temporary employment opportunities during the construction phase, to what extent has DAC or the Minister assessed the economic or social benefits **at a State level** of the proposed Development?

To what extent has the Proponent addressed the **detriment to the State** if the Development is not approved? There is little substantiation of this nature in the DR itself.

### **Objection to Development**

The length and complexity of the DR and the limited time period within which to consider its content have hampered my ability to assess the likely impacts and to prepare a submission which addresses the issues in a meaningful way.

Where substantiation for any of my submissions is lacking, it is mainly due to these factors and I foreshadow that I may **seek additional time** to provide further information or submissions.

I am also aware that the owners of my neighbouring property at [REDACTED] have been overseas and have only just been made aware, by their tenant, of the existence and extent of this proposal. I am aware that **they wish to lodge an objection** and/or submissions but, due to the truncated consultation period, may now be precluded from doing so in any effective manner.

The principal areas of concern, which I address in the attached Submission, are:

1. Loss of amenity through:
  - (a) overshadowing;
  - (b) visual impact;
  - (c) increased noise and light disturbance;
  - (d) loss of privacy through overlooking and the proposed security measures;
  - (e) wind turbulence effects
2. Effects on the residential character of Kensington, Norwood and Beulah Park more generally;
3. Traffic increases and traffic management issues; and

4. Devaluation of my Property.

I address each of these matters in the attached Submission document.

Except as highlighted below, I have no objection to information contained in the Submission being made public but only for the specific purpose of the Response Document which is to be prepared by the Proponent.

**❖ I do not give consent for comments in the Submission which are highlighted in the manner of this paragraph to be made public.**

I seek an undertaking from the Proponent that I will be provided a full copy of the Response Document, concurrently with its publication.

[REDACTED]

## 1 *Loss of amenity*

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### 1.1 *Background*

#### (a) Background

- I purchased the property at [REDACTED], Kensington, as my principal place of residence in 2001 (see **attached** Certificate of Title).
- The primary attraction of the Property to me was the large areas of glass at the rear overlooking a sunny, but manageable size, rear courtyard together with the additional sun drenched area at the side of the property abutting Bowen Street.
- I had previously lived in an older row-style cottage which had little or no natural light and while living there suffered from symptoms commonly associated with “SAD” (Seasonal Affective Disorder).

#### (b) Investment

- In 2014 /15 I invested approximately \$30,000 in redesigning the outside areas of my Property to improve the amenity of the rear courtyard and, more particularly the western side of the property, specifically to take better advantage of the western sun which can be enjoyed in this area until late afternoon even in winter months. (see **attached** planning approval and photographs of the improvements made)
- I had the area planted with largely drought tolerant native species which thrive in full sunshine.
- This area is totally shaded in the mornings but enjoys full sun from midday until late afternoon and the planting was specifically selected to take advantage of these full sun conditions.

#### (c) Consideration of Future Development

- At the time of purchasing my Property it was my understanding that the area was zoned Residential Historic (Conservation) and I believe that is still the case.
- I was aware that 270 The Parade was a commercial building (at that time occupied by a government department) and that there was some possibility that the site could be developed in the future.
- I thought it likely that an additional storey may be added at some point, particularly as a large part of the building is single storey.
- Nevertheless, due to the zoning restrictions on my property, I believed that restrictions in the Development Plan against developments in a Business

Zone abutting a residential zone, would prevent any such development from unduly impacting on the amenity of neighbouring areas and would provide me with protection against any multi story building (at least one in excess of 3 storeys) being constructed in that location.

- My decision to purchase the property was influenced by existing planning conditions in the area.

***The size and scale of the current Development proposal has therefore come as a complete shock.***

## **1.2 Overshadowing – Loss of direct sunlight**

- (a) I note that the overshadowing projections in the DR have been prepared only up until 3pm in each seasonal period. No consideration is given to loss of direct sunshine and light after that time.

- (b) At page 14 of the DR a discussion of setbacks of the upper floors of the Development states that

*“the effect is that the neighbouring properties are only be [sic] overshadowed by the built form from 3pm on the autumn equinox through winter solstice’s [sic] to the spring equinox”*

- (c) I have concerns with this statement as follows:

- the overshadowing projections show shadowing of my Property in winter will commence well before 3pm so the statement is not, on its face, factual. I am not an expert in this area but suggest that shadowing of the western façade and rear courtyard of my Property would occur from around 12.30pm (to 1pm at the latest).
- the projections show full shade extending over my entire property and well beyond by 3pm at both the Spring equinox and Autumn equinox which suggests that overshadowing of my Property starts well before the stated 3pm.
- At the summer solstice, the 3pm diagram shows overshadowing about to occur. I currently enjoy full afternoon sunshine in my rear courtyard (and particularly on the western side area) until as late as an hour before sunset (although this obviously varies seasonally).

- (d) At page 27 the DR states *“Importantly, it is evident that the proposal will maintain at least 3 hours of sunlight to the adjacent residential properties to the east.”*

- **This statement is patently untrue as far as it relates to my Property.**

- Unlike other properties on Bowen Street, my Property is positioned in the north-east / south-west orientation – in that it faces onto High Street not Bowen Street.
  - Except in the summer months I receive **virtually no morning sunlight** to any part of my Property. The rear of my Property is shadowed by existing residential buildings in Bowen Street lying to the north east of my property. The western side and front yard are obviously in shadow cast from my own house at these times.
  - Therefore, if the Development proceeds,
    - in **winter** months I will be overshadowed by existing properties to the north-east until shortly before noon and then overshadowed by the Development to the west from shortly after 12 noon – being an hour at best of access to sunlight.
    - **Spring** and **autumn** light will also be substantially diminished as I receive extremely minimal morning sunlight and will be cut off from sunlight well before the 3pm overshadowing stated in the DR.
    - As no data has been provided for the overshadowing effects for periods shorter than 3 hourly intervals, and none is provided for periods after 3pm at all, I am not able to calculate the exact effects but estimate that I would receive less than 2 ½ hours of total sunlight in **spring** and **autumn** and less than 1 ½ hours in **winter**. This is well below the stated minimum of 3 hours in all season in the Development Plan and under guidelines elsewhere.
  - **Contrary to the requirements of the Guidelines** at page 6 that “*Shadow diagrams demonstrating the extent of overshadowing (pre and post development) on adjoining properties...” be provided, information regarding **pre-development** shadowing is not included in the DR.*
  - In the absence of this required information I can only estimate that existing access to daylight at my Property is in the order of:
    - **at least** 4 hours in winter; and
    - **at least** 6 hours in spring and autumn
- (e) I note that the “*uninterrupted views and access to daylight, .... providing a flexible and pleasant working environment for the contemporary office accommodation*”, referenced at page 15 of the DR, therefore come largely at my expense.

### **1.3 Overshadowing – Loss of indirect light**

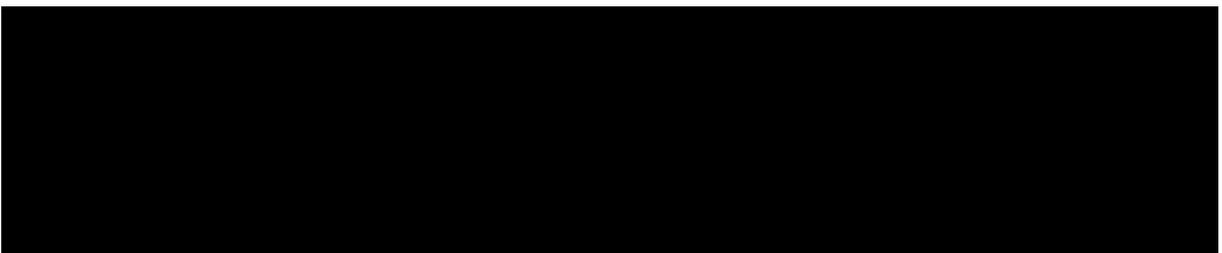
- (a) The effects of overshadowing are, of course broader than the loss of *direct* sunlight to outside areas of my Property.
- (b) These areas are of course already shaded from direct sunlight at various times of the day - by neighbouring dwellings, street trees and the shadow of my own house and plantings. These existing, surrounding elements cast shadows but do not “overshadow” in the same sense that the Development proposes to do. That is, to the extent of blocking out all daylight and/or views of the sky from either the outside areas or the internal rooms of my Property.

#### **1.4 *Overshadowing – loss of solar amenity***

- (a) Currently, direct sunlight reaching the external, ground level of my Property in the winter months, is around 4 hours. In addition however, the western wall of my 2 storey dwelling receives direct solar heating for substantially longer than that period. The overshadowing diagram provided in the DR shows that no direct sunlight will reach that part of my Property from 3pm, at the latest (and I suggest that it is more likely from 12.30pm).
- (b) In around 2012, I invested in double glazing of the large picture windows at the rear of my property in an attempt to reduce heating costs and the carbon footprint of my home. I anticipate that the loss of winter sunlight on the western wall of my Property will significantly increase the need for electricity use in compensating for the lost solar heating effects which this afforded to internal living spaces.
- (c) A number of years ago when replacing my hot water service, I also investigated the possibility of installing solar panels on my roof. I have revisited that thought on a number of occasions, including in response to recent Government subsidies which have been available in different forms, from time to time. I have been advised that my Property is not ideally oriented for the use of solar infrastructure but if I were to install panels they would need to go on the north- western roof slope (ie facing onto Bowen Street). Obviously if the development proceeds, any option for converting to solar power will be entirely precluded.

#### **Personal effects of Overshadowing**

***In summary, I perceive that the overshadowing effects of the Development will have the following adverse impacts on me as both the owner and occupier of my Property:***



## 1.5 Visual Amenity

- (a) The height and bulk of the Development are both unprecedented.
- (b) In the briefing which I, (and residents of Bowen Street) received directly from the Proponent, (***Residents' Briefing***) it was stressed that the building would be *only* 7 storeys in height – (that being enough cause for concern at the time).
- (c) Having subsequently read the DR, **I find these statements by the Proponent to be misleading and entirely disingenuous.**
  - Firstly, there are 7 storeys above the ground floor (making 8 effective storeys) **plus** 6m of plant to be located on the roof.
  - The internet<sup>1</sup> tells me that, a standard, mixed-use building is usually 3.5m per floor (with car parking and residential buildings usually being less than this per floor- perhaps 3.1m).
  - In contrast, the DR reveals that each of the **first 3 levels** of this Development (being Ground floor and Levels 1 and 2) are **each 3.6m** in height with subsequent floors (Levels 3 to 7) **each being 4.2m**. The rooftop plant adds a further 6.3 m or **2 further storeys** to the building.

***The plans indicate that the building tops out at 38.15m which is the equivalent of an 11 storey mixed use building or a 12 storey hotel building.***

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<sup>1</sup> I have had no time for more investigation of building standards in South Australia.

- (d) In addition to the overshadowing effects which are directly related to the unprecedented height of the proposed structure, the DR suggests that the visual amenity of Bowen Street residents (which I take as including me) will not be affected because they are already looking onto a blank brick wall of a commercial building. I submit that there is a significant difference between looking at 1 storey of blank wall<sup>2</sup> and being faced with 11-12 storeys of a structure which blots out the skyline entirely.
- (e) Currently I am able to clearly see the spire and steeple of the Clayton Wesley Church from my back yard and much of its roofline as well from the upstairs windows of my Property.

**The suggestion by the Proponents that my visual amenity will not be adversely impacted is, quite frankly, offensive.**

- (f) This is a building of enormous proportions and the plan to locate it directly adjacent to a long established residential area on which it will have both a physical and metaphorical overshadowing effect is distressing.
- (g) A standard 5 storey building in this location would be noticed and cause comment (and be less than desirable from my personal perspective) but this proposed monolith, which will tower over even the tallest of surrounding buildings, would be a blight on the character of not just the Kensington area but 5 suburbs in every direction.
- (h) During the Residents' Briefing it was highlighted that the owners of the site wish to create a building which would make a lasting statement and, to that end, were sparing no expense.

**I would urge the decision makers to consider exactly what kind of statement is being made. The grandiose nature of the proposal appears to be hubris in the extreme, with no consideration given to the aesthetic of the neighbouring historic buildings or the essentially residential character of the suburb in which it is located.**

## **1.6 Residential Historic (Conservation) Zone interface**

- (a) In addressing issues of "interface" with its neighbours the DR states variously:
 

at page 21: "...Bowen Street and High Street (at the interface with The Subject Site have very limited historic character".

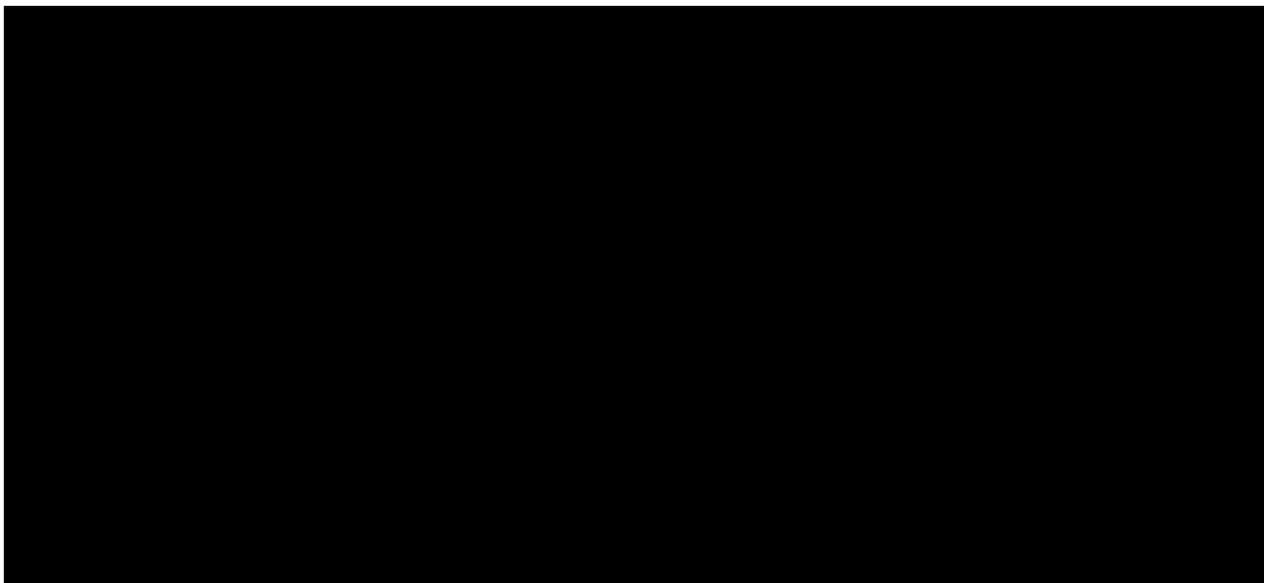
at page 22: "While the proposed development is notably taller than that across High Street, I consider it to have negligible impacts on the amenity and character of this interface as:....the current residential and historic character of High Street along this frontage is low/poor"

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<sup>2</sup> which is in fact hardly visible above the fence line of my Property

and later "...Bowen Street also has limited residential character, with just under half of the eastern side accommodating residential use (with the remainder being commercial), while the western side accommodates no residential use"<sup>3</sup>.

- (b) These comments appear to address only the "historic (conservation)" component of the zoning reference and not the "residential" character of the suburb generally and Bowen/High Streets in particular.
- (c) The fact that there are only a "limited number" of residences *immediately* adjacent to the Development site does not alter the fact that there are residences which will be affected and the fact that the residents to be affected could have expected protection from such effects under the existing Development Plan is ignored completely.
- (d) In my view the "residential character" of much of the suburb of Kensington will be affected to one degree or another.



- (e) The above anticipated detrimental effects on my Property alone mean that I will need to consider moving out of my home of 15 plus years.
- (f) I am concerned that the equity in the property (which had escalated substantially since my purchase in 2001) and which I expected could have been used to partly fund my retirement will be dramatically reduced by the Development. I fear that relocation now to an equivalently appealing location may be beyond my financial capacity.
- (g) Equally, I believe that the potential rental returns on my Property, if I decided to move and retain the Property for rental purposes, would not allow me to buy in an equivalent location at current market prices. I am aware that at least one

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<sup>3</sup> Emphasis added.

tenanted property in Bowen Street has lost its tenant as a direct consequence of concerns about the Development.

- (h) If I were renting at this time, I would certainly not choose my Property if made aware of the imminent threat of future overshadowing and the disruption which will inevitably come with a construction phase of at least 12 months.

### 1.7 Comparison with other Developments

- (a) I note comments at page 23 that:

*“Thorough consideration has been given to the surrounding environments by the design team...the following elements have been taken into consideration during the design process:*

- ...
- *The residential uses adjoining the subject land, particularly along Bowen Street; and*
- *Previous and proposed Development Plan policy changes within the broader locality which may lead to future high rise development being established along the Parade”*

- (b) I presume this reference to policy changes and high-rise development relates specifically to the Nuova Apartments development on the Parade (and potentially the Bath Apartments further down the Parade. There are other references to the Nuova development scattered throughout the DR.

- (c) It is of concern to me that a number of these references seem to suggest a correlation between that development and the Peregrine proposal including as to:

- height equivalency;
- location of a high-rise development within an historical/residential context.
- wrapping<sup>4</sup> around an existing historical building

- (d) This correlation, if intended, **is misleading in the extreme.**

- (e) I am familiar with the Nuova development<sup>5</sup>.

- The approved Nuova building is: 1 Ground floor commercial level with 5 floors of apartments with residential height ceilings.

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<sup>4</sup> “In March 2015 the IMDAC approved a redevelopment proposal 254-256 The Parade (DA 155/M053/14). This proposal effectively ‘wraps’ around the State Heritage place located at 258-262 The Parade (Ref 2, Image 1), to accommodate a mixed use multi-storey residential and retail development. .... I understand the development to be 6 storeys in height”

❖ <sup>5</sup> **I am a co-purchaser, off-plan, of a 5<sup>th</sup> floor eastern facing apartment. I will be submitting a separate submission together with the co-purchaser in relation to the direct, adverse effects of the Development on the Nuova property.**

- I do not have exact height measurements to hand but believe that the total height of the building could not exceed 21m (roughly **half the height** of the Peregrine Development).
- While the building is higher than its neighbours on the Parade, it by no means dwarfs them either in height or in bulk.
- The building does not “wrap around” the State Heritage Place. It is located entirely to the west of that building. The additional red shaded area behind the 252-258 the Parade highlighted in the DR in fact consists of an existing portion of the land title for the project on which an *existing* access “road” is located behind the heritage structure and on which no building, associated with the Nuova Apartments, is to be located.
- The Apartments are wholly located within the business precinct of the Norwood Parade and do not abut existing, established residences or interface with an existing residential zone.

**Any implication that the 2 developments are equivalent in size or impact or suggestion that the prior approval of the one justifies the automatic approval of the other, is fatuous.**

## **1.8 Noise and Light Disturbance**

### (a) Noise

- I have not had a chance to properly assess the technical noise report contained in the DR.
- It would be reasonable to assume however that, even if noise levels will be designed to be “within guidelines”, there will be an overall increase in noise levels (including from increased vehicular traffic in the daytime, the concentration of cars entering and exiting the parking structure and from the building plant to be located on the roof level, presumably running both night and day).
- In any event, I do not believe there is any suggestion in the DR that noise will be reduced so the new noise effects will only add to the cumulative adverse effects on my Property.

### (b) Light

- I read with concern the statement at page 16 that:

*“The building will be **externally illuminated** in order to ensure a safe external environment.....”*

- There is no information as to where this lighting will be located, its relative brightness, whether it will be directional, movement activated etc,

- Presumably “the safety of the external environment”, will take precedence over any disturbance which may be caused to the “limited number of residences” on Bowen/ High street whose residents may be kept awake by lights either constant or flashing.

### **1.9 Privacy – Overlooking and Security cameras**

- (a) I was assured by the Proponents at the Residents’ Briefing that there was no possibility of overlooking my Property due to the step-back nature of the building design. Presumably this was based on the “guidelines” that if the view of someone nude sunbathing in their back yard is from a distance of 15m or more, the observer is deemed to be blind. Of course, as there will be no sun in which to nude bath, there is really no problem!
- (b) My reading of the diagrammatic visualizations provided in the DR is that there is a direct line of sight into my Property from the deck around the first level of office buildings above the car park. Ostensibly however, the distance from, that angle is something between 15 and 20m technically my Property is not overlooked, notwithstanding that all privacy in the outside areas of my Property will be lost.
- (c) Presumably other Bowen Street residents whose bedroom windows and front entrances are directly overlooked will have similar concerns.
- (d) At page 16 the DR states that:

*“In addition, [that is, in addition to the external illumination to provide a safe external environment], CCTV surveillance will operate both internal and external to the building” and “the decks and balconies provided on upper levels will enable surveillance over public spaces”*
- (e) Presumably, such cameras will be angled in such a way as to specifically avoid recording sightlines which include any part of my Property. I assume that other residents of Bowen Street would also take exception to their front driveways being subject to CCTV surveillance

**I seek confirmation from the Proponent that at least this level of privacy will be afforded.**

### **1.10 Wind Turbulence**

- (a) Again I am disadvantaged by the time available to consider the available information and the technical nature of the information relating to this aspect of the Development.
- (b) On my lay reading of the ARUP report, the only area which will be specifically, adversely affected by wind-tunneling is “**High Street near the corner of Bowen Street**” ie my Property.

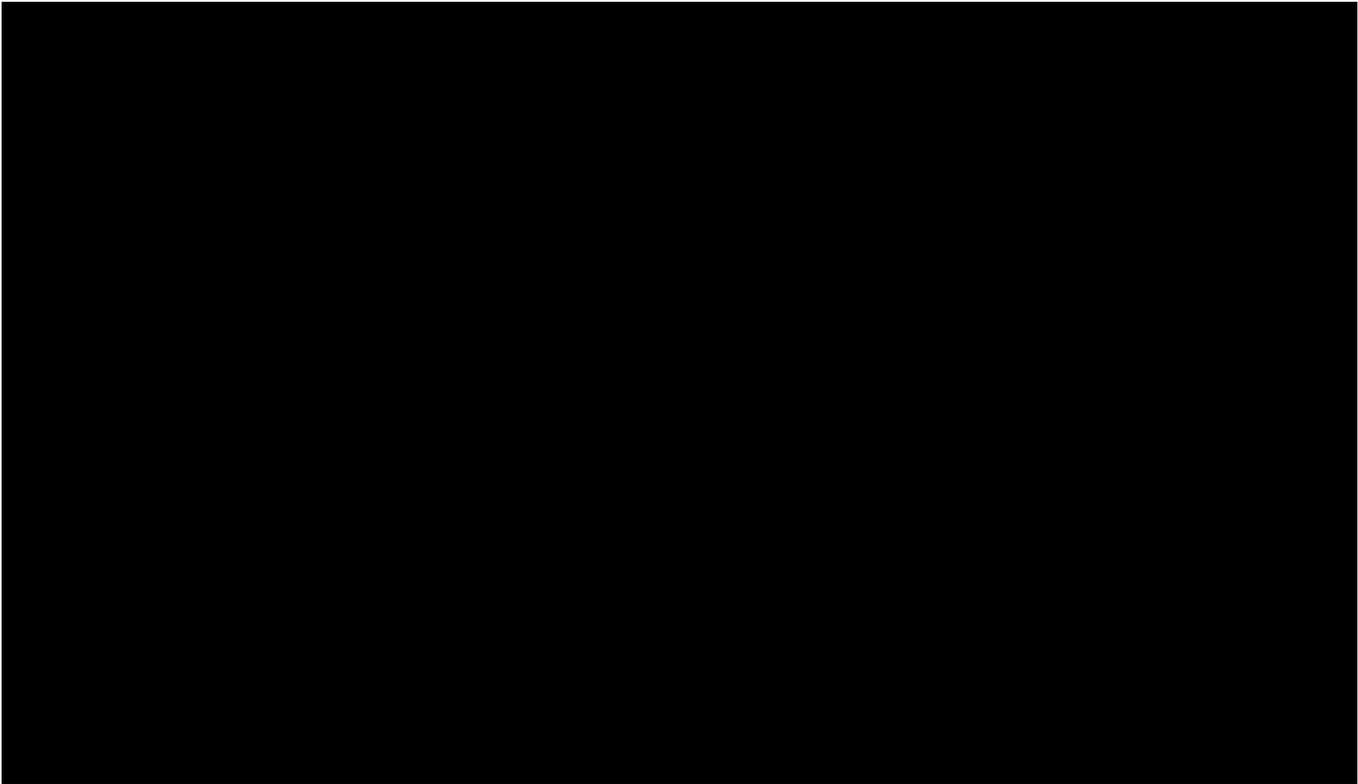
- (c) The report appears to look mainly at the impact of wind on pedestrians (and to some extent those who may be enjoying the sunshine at the café on the south western corner of the Development). The summary at page 9 of the Report notably states:

*“South-westerlies incident the Portrush Road façade may result in accelerations around the corner to Bowen Street. However, given that this space is likely only to be used as a transitional area, this is considered likely acceptable”.*

Figure 7 identifies that the level 4 wind occurrences (ie those causing discomfort except for 8-10m/s for “fast or business walking”) directly affect my Property and in particular the western side outdoor area that is at present most conducive to outdoor enjoyment.

## **2 Property Devaluation**

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## **3 Traffic Management Issues**

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### **3.1 General**

- (a) As indicated above, I do not suffer from the current issues experienced by residents of Bowen Street regarding day time commercial delivery vehicles using that street to access warehouse facilities but understand that this is one of the traffic management issues which the development is designed to address.

- (b) That is welcome and the second stage proposal to allow two way access to the street at the northern end seems sensible.

### **3.2 Concerns**

- (a) My concern lies with the 3 levels of parking (including one underground level) and the single entry point off High Street in close proximity to Portrush Road.
- (b) The Proponent argues that this will alleviate the issue of employee cars:
- parking on High and surrounding side streets during the day;
  - driving through surrounding streets at peak times looking for street parking.
- (c) This may be true but the downsides are that it will instead:
- concentrate all of this traffic at a single bottleneck point (the entrance to the car park; and
  - along with the increased staffing levels in the new building, actually increase traffic to and from the site by 25-35%;
  - encourage existing and future employees who may have chosen public transport when parking was in short supply, to drive to the site, again increasing total traffic flows.
- (d) The likely access routes will be:
- South along Portrush road and left into High St<sup>6</sup>
  - North along Portrush Road and right into High St.
- (e) Presumably there will also be some who wish to access the car park by travelling west down High St (entering High St from some point further up the Parade or Kensington Road), thus needing to turn right into the car park (unless this method of access is intended to be precluded). The DR is not clear on this point.
- (f) Traffic studies in the proposal have attempted to assess existing traffic flows. While figures are provided early in the report for the 8am-9am peak period which corresponds with the school drop off period at Mary Mackillop College, later assessments seem to largely ignore these figures.
- (g) The risk of traffic queuing across the Parade / Portrush intersection seems, at least anecdotally, to be higher than disclosed in the proposal.

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<sup>6</sup> Coming (a) west down the Parade and left onto Portrush; (b) east up the Parade and right onto Portrush; (c) south along Portrush Road from the north and crossing the Parade.

- (h) Almost all employee traffic will be concentrated at the High Street entrance (either turning left from Portrush or right across Portrush Road into High Street) rather than being dispersed more generally in the surrounding streets and access points.
- (i) This, together with the increased number of employees (and tenant employees) and the potential increased number of employees choosing to travel by single vehicle, does not appear to have been taken into account in the projections.
- (j) The notion that employees will choose to cycle or take public transport when convenient, free and plentiful car parking is being made available on site seems naïve at best. I expect that there will be a dramatic increase in vehicular traffic to the site and that the single point car park entrance will become a bottleneck causing dangerous queuing of traffic back along High Street and onto Portrush Road.

### **3.3 Car park fumes**

- (a) At the Residents' Briefing, much was made of the planned treatment of the ground level car park façade and the intention to apply vertical sandstone fins to the external wall to improve aesthetics while still complying with building code requirements for ventilation of the structure.
- (b) I understood this to mean that, the concentration of vehicular fumes from some 290 cars within the structure are acknowledged to be a health hazard for users unless the fumes are dispersed away from the structure.
- (c) My query as to the effects of that concentration of exhaust fumes being dispersed directly towards the neighbouring properties was dismissed out of hand. I was told that the fumes simply dissipate into the surrounding atmosphere with no more harmful effects than those emitted by cars on neighbouring streets.
- (d) The argument was made that these vehicles already travel to the area and therefore the effects can be no greater than already exist.
- (e) With respect, I believe it has long been established that there are health consequences associated with living next to busy roads so my question was not an idle one.

- (f) I have chosen to live near to Portrush Road and the Parade; both busy thoroughfares. **I did not choose to live next to a multi-storey parking structure** designed to accommodate some 290 vehicles.
- (g) I submit that:
- Existing vehicle movements are currently dispersed throughout the neighbouring streets;
  - The parking structure will capture and concentrate emissions in one centralised location;
  - The volume of traffic will be increased significantly (as noted above) and this new traffic will also be concentrated in and around the parking structure.

**Please advise whether any studies are available or will be undertaken regarding the health effects of living in close proximity to such a structure where exhaust fumes are ventilated directly to the adjoining air spaces. It seems reasonable to expect that there would be some adverse effects.**

**Please also advise whether consideration has been given to requiring the extraction and exhausting of emissions away from habitations.**

### **3.4 Telecommunications**

- (a) I am concerned that no information seems to have been provided as to whether mobile and wi-fi connectivity will be affected in areas to the east and north east (eg Beulah Park) of the development site.
- (b) I believe that this area is mainly serviced by the mobile tower facilities located on the Water Tower at 275 Portrush Road<sup>7</sup>. Unless it is planned to move these facilities, it is hard to see that the access to mobile and wi-fi services of those residences located *behind* the Development site will not be adversely affected, (to a smaller or larger degree depending on their proximity to the Development).

**Please advise whether the developer will be responsible for relocating these facilities, and if so, to where.**

## **4 Non-Compliance of DR with DAC approved Guidelines**

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I submit that the DR, as prepared, is deficient in at least the following aspects:

### **4.1 Pre and Post Development Overshadowing**

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<sup>7</sup> Ref: OzTowers website map

The approved Guidelines specifically require the Proponent to identify pre-development shadowing effects of the site as well as projected post development shadowing. This information has not been provided.

#### **4.2 Development Plan and matters prescribed by Regulations under the Act**

- (a) The guidelines state that: *“The DR should detail any expected environmental, social and economic effects of the development, and the extent to which the development is **consistent with the provisions of the Council’s Development Plan**, the Planning Strategy and any matter prescribed by the Regulations under the Act.”*
- (b) The expression of consistency with the Development Plan necessitate an identification of those areas in which the proposed development is inconsistent with those requirements.
- (c) I note that the current proposal is, arguably inconsistent with some or all of the below quoted “objectives” and “principals” under the Development Plan and that a statement to that effect must be contained in the DR.

#### **“CITY WIDE**

##### **Orderly and Sustainable Development**

*The future development of the City of Norwood Payneham & St Peters will in part be influenced by the development of the Metropolitan area....*

*It is essential that the future development of the City addresses issues such as increased housing demand, efficient use of infrastructure and population change, while at the same time retaining the City’s built heritage and valued elements of its historic character that play a major role in defining the City’s character. ....*

##### **OBJECTIVES**

**Objective 1:** *Orderly and economic development that creates a safe, convenient and pleasant environment in which to live.*

**Objective 2:** *A proper distribution of living, working and recreational activities by the allocation of suitable areas of land for those purposes.*

**Objective 3:** *The provision of such facilities as are required for accommodation, employment, recreation, health and welfare.*

**Objective 6:** *Co-ordination of the City’s development with that in the abutting council areas, and other council areas which may be affected.*

**Objective 7:** *Rational distribution of land uses to avoid incompatibility between them.*

**Objective 8:** *Compatibility of new buildings with the desired environment around them.*

**Objective 10:** *Development that does not jeopardise the continuance of adjoining authorised land uses.*

**Objective 11:** *Provision of a choice of lifestyles within the law and custom of the community.*

##### **PRINCIPLES OF DEVELOPMENT CONTROL**

1 *Development should be orderly and economic.*

2 *Development should:*

- (c) *create a safe, convenient and pleasant place to live.*

3 Development should take place on land which is suitable for the intended use of that land, having regard to the location and condition of that land and the provisions for the relevant Zone and Policy Area.

4 Development should take place in a manner which will not:

- (a) interfere with the effective and proper use of any other land; and
- (b) prevent the attainment of the objectives for that other land.

5 Development should be undertaken in accordance with the Norwood Payneham and St Peters (City) Structure Plan, Map NPSP/1 (Overlay 1) Parts A & B.

6 Development should not take place excessively in advance of a demonstrated need for the use for which it provides.

10 Building development should not take place where it would require substantial excavation or earthworks.

11 Buildings should be designed so as not to unreasonably overlook or overshadow indoor or outdoor living areas of adjacent dwellings.

12 Development should take place in a manner which is not liable to cause an unreasonable nuisance to neighbours or the community or significantly detrimentally affect the amenity, use or enjoyment of nearby properties by:

- (a) the emission beyond the site boundaries of noise, vibration, odour, atmospheric liquid or other pollutants, waste water, waste products, electrical interference, light overspill or loss of privacy;

18 Where development is expected to impact upon the existing infrastructure network (including the transport network), development should demonstrate how the undue effect will be addressed.

### **Design and Appearance of Land and Buildings**

#### **OBJECTIVES**

**Objective 18:** The amenity of localities not impaired by the appearance of land, buildings and objects.

**Objective 19:** Development of a high architectural standard and appearance that responds to and reinforces positive aspects of the local environment and built form.

**Objective 21:** The continued visual dominance of key reference buildings, such as the Norwood Town Hall, St Peters Town Hall, the Maid and Magpie Hotel, Norwood Hotel, Bon Marche Building, the Payneham Uniting Church and the former Kent Town Brewery Site.

#### **PRINCIPLES OF DEVELOPMENT CONTROL**

28 The appearance of land and buildings should not impair the amenity of the locality in which they are situated.

- (b) should complement the urban context of existing buildings on adjoining and nearby land in terms of:

- (i) maintenance of existing vertical and horizontal building alignments

- (c) should not visually dominate the surrounding locality.

31 The design and location of buildings should ensure that adequate natural light is available to adjacent dwellings, with particular consideration given to:

- (a) windows of habitable rooms, particularly the living areas of adjacent buildings;
- (b) ground-level private open space of adjacent dwellings;
- (c) upper level private balconies that provide the primary open space area for any dwelling; and
- (d) access to solar energy.

32 *The height of buildings, structures and associated component parts should not exceed the number of storeys or height in metres above the natural ground level prescribed in the relevant Zone and/or Policy Area.*

*For the purposes of this Principle, 'storey' refers to the space between a floor and the next floor above, or if there is no floor above, the ceiling above. A mezzanine floor level shall be regarded as a floor. A space with a floor located below natural ground level shall be regarded as a storey if greater than one metre of the height between the floor level and the floor level above is above natural ground level.*

34 *Development on corner allotments should:*

*(a) reinforce the primary and secondary street frontages of the subject site with highly articulated building forms; and*

*(b) be sited to complement the siting of buildings on the adjacent corner sites.*

35 *Unless otherwise specified in the relevant Zone and/or Policy Area, where a building is sited on or close to a side boundary, the side boundary wall should be sited and limited in length and height to minimise:*

*(a) the visual impact of the building as viewed from adjoining properties;*

*(b) overshadowing of adjoining properties and allow adequate sunlight to neighbouring buildings, private open space and solar collectors (such as solar hot water systems and photovoltaic cells); and*

*(c) the risk of damage to mature/regulated vegetation on adjoining properties taking into consideration potential damage to the root system.*

37 *The external walls and roofs of buildings should not incorporate highly reflective materials which will result in excessive glare.*

38 *Structures located on the roofs of buildings to house plant and equipment, should be screened from view and should form an integral part of the building design in relation to external finishes, shaping and colours.*

45 *Development in non-residential zones abutting the Residential Zones or the Residential (Historic) Conservation Zones, should not prejudice the attainment of the Objectives relating to the residential zones.*

46 *Development adjacent to the boundary of a Residential Historic (Conservation) Zone, should provide a transition down in scale and mass to complement the built form within the Residential Historic (Conservation) Zone.*

47 *Development should not, in respect to its appearance, interfere with the attainment of the Objectives for the relevant Zone or Policy Area or otherwise impact upon the existing character of scenic or environmentally important areas.*

48 *Outdoor lighting should not result in light spillage on adjacent land*

#### **Interface Between Land Uses**

##### **OBJECTIVES**

**Objective 26:** *Development located and designed to minimise adverse impact and conflict between land uses.*

**Objective 27:** *Protect community health and amenity from the adverse impacts of development and support the continued operation of all desired land uses.*

##### **PRINCIPLES OF DEVELOPMENT CONTROL**

80 *Development should not detrimentally affect the amenity of the locality or cause unreasonable interference through any of the following:*

*(b) noise;*

*(d) electrical interference;*

- (e) *light spill;*
- (f) *glare;*
- (h) *traffic impacts.*

81 *Residential development adjacent to a non-residential land use or zone or within a non-residential zone should be located, designed and sited in a manner which:*

- (a) *protects residents from any adverse effects of non-residential activities; and*
- (b) *minimises negative impact on existing and potential future land uses considered appropriate in the locality.*

82 *Non-residential development in residential zones should:*

- (a) *not detrimentally impact on the amenity of nearby residents;*
- (b) *provide adequate protection for residents of adjoining sites from air and noise pollution, traffic disturbance and other harmful effects on health or amenity; and*
- (c) *not negatively impact on adjoining open space, mature trees or vegetation.*

83 *Non-residential development adjacent to a residential zone or within a residential zone should be located, designed and sited to minimise overlooking and overshadowing of nearby residential properties.*

84 *Non-residential development on land abutting a residential zone or within a residential zone should be designed to minimise noise impacts and achieve adequate levels of compatibility between existing and proposed uses.*

85 *Sensitive land uses which are likely to conflict with the continuation of lawfully existing developments and land uses considered appropriate for the zone should not be developed.*

#### **Air Quality**

90 *Development with the potential to emit harmful or nuisance-generating air pollution should incorporate air pollution control measures to prevent harm to human health or unreasonable interference with the amenity of sensitive uses within the locality*

#### **Movement, Transport and Car Parking**

**Objective 31:** *A compatible arrangement between land uses and the transport system which will:*

- (a) *ensure minimal noise and air pollution;*
- (b) *protect amenity of existing and future land uses;*
- (c) *provide adequate access; and*
- (d) *ensure maximum safety.*

**Objective 32:** *A form of development adjoining main roads which will:*

- (a) *ensure traffic can move efficiently and safely;*
- (b) *discourage commercial ribbon development;*
- (c) *prevent large traffic-generating uses outside designated shopping/centre zones*

#### **PRINCIPLES OF DEVELOPMENT CONTROL**

##### **Access**

113 *Development should be provided with safe and convenient access which:*

- (a) *avoids unreasonable interference with the flow of traffic on adjoining roads;*
- (b) *provides appropriate separation distances from existing roads or level crossings;*
- (c) *accommodates the type and volume of traffic likely to be generated by the development or land use and minimises induced traffic through over-provision; and*

*(d) is sited and designed to minimise any adverse impacts on the occupants of and visitors to neighbouring properties.*

*124 Vehicle parking areas should be sited and designed to:*

*(c) not inhibit safe and convenient traffic circulation;*

*(i) not dominate the character and appearance of the development when viewed from public roads or spaces.*

*126 Vehicle parking areas that are likely to be used during non-daylight hours should provide floodlit entry and exit points and site lighting directed and shaded in a manner that will not cause nuisance to adjacent properties or users of the parking area.*

*132 Vehicle parking spaces and multi-level vehicle parking structures within buildings should:*

*(b) complement the surrounding built form in terms of height, massing and scale;*

*Medium and High Rise Development (3 or More Storeys)*

### **Environmental**

*268 Multi-storey buildings should:*

*(a) minimise detrimental micro-climatic and solar access impacts on adjacent land or buildings, including effects of patterns of wind, temperature, daylight, sunlight, glare and shadow; and*

*270 Development of five or more storeys, or 18.5 metres or more in building height (excluding the rooftop location of mechanical plant and equipment), should be designed to minimise the risk of wind tunnelling effects on adjacent streets by adopting one or more of the following.*

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

*(b) Development should:*

*(i) comply with the objectives for the Zone or otherwise be compatible with the predominant character of other buildings in the locality; and*

*(ii) preserve buildings of historical or architectural significance.*

*(c) Development should provide:*

*(i) off-street loading, service areas and service vehicle manoeuvring areas;*

*(ii) lighting for buildings and ancillary areas, with no light spill causing nuisance or hazard; and*

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

*(i) microclimatic conditions;*

*(iv) overlooking;*

*(v) overshadowing; or*

*(vi) visual intrusion.*

### **Heritage**

*The City of Norwood, Payneham & St Peters derives many benefits from its large number of intact State and local heritage buildings which define a certain character and ambience throughout many parts of the City, setting it apart from other metropolitan areas. It is desired that these places be conserved for the benefit of present and future generations, and to maintain a historic and cultural record of the settlement of the State and the Council area. The conservation of these places also enhances the attractiveness of the Council area to tourists and visitors.*

*For the purpose of interpreting the Objectives and Principles of Development Control a heritage place in the City of Norwood, Payneham & St Peters is:*

- a State Heritage Place entered in the State Heritage Register or a place that is a provisional entry in the Register; or
- a Local Heritage Place.

#### **OBJECTIVES**

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

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

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

**Objective 113:** Public awareness of heritage areas and places within the Council area that are of cultural, environmental, social, historic or architectural significance.

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

*Development on land adjacent to land containing a heritage place*

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

- (a) scale and bulk;
- (b) width of frontage and boundary setback patterns;
- (c) proportion and composition of design elements;

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

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

#### **Telecommunications Facilities**

#### **OBJECTIVES**

**Objective 120:** Telecommunications facilities provided to meet the needs of the community.

Telecommunications facilities are an essential infrastructure required to meet the rapidly increasing community demand for communications technologies. To meet this demand there will be a need for new telecommunications facilities to be constructed.

403 Telecommunications facilities should:

- (a) be located and designed to meet the communication needs of the community;

407 Telecommunications facilities should not detrimentally affect the character or amenity of Historic Conservation Zones or Policy Areas, Local Heritage Places, State Heritage Places, or State Heritage Areas.

#### **RESIDENTIAL HISTORIC (CONSERVATION) ZONE**

## **Introduction**

*The objectives and principles of development control that follow apply in the Residential Historic (Conservation) Zone shown on Maps NPSP/3, 4, 6, 7, 9, 10, 11, 21 and 22. Further objectives and principles of development control also apply to policy areas that are relevant to the zone. The provisions for the zone and its policy areas are additional to the City Wide provisions expressed for the whole of the council area.*

*Development will preserve and enhance the historic character and ambience of localities by providing for a range of high-quality residential accommodation which reinforces the historic character and residential amenity of the relevant policy area.*

*New buildings and additions to buildings within this zone will reinforce the existing streetscape and historic building stock. New dwellings will be of a complementary nature which do not compete or stand out against the historic elements for streetscape prominence. They will take into careful consideration the scale of the surrounding dwellings.*

## **OBJECTIVES**

**Objective 1:** *Development that conserves the heritage value and historic character of the Residential Historic (Conservation) Zone and reinforces the desired character of the zone and the relevant policy area.*

**Objective 2:** *The preservation of areas of historical significance primarily in residential use.*

**Objective 3:** *The retention, enhancement and conservation of land, buildings and their settings, structures and landscape elements within the Residential Historic (Conservation) Zone that contribute significantly to its heritage value and historic character.*

**Objective 4:** *Continued residential use in a variety of housing types and at dwelling densities consistent with the historic character for each of the relevant policy areas within the zone.*

**Objective 5:** *Development that is sympathetic and compatible with the heritage value and historic character of the zone, but is also subordinate to the local historic character in terms of streetscape impact.*

**Objective 6:** *Development that maintains the established allotment sizes and patterns, siting and orientation of buildings and incorporates high standards of design, building materials and landscaping.*

**Objective 7:** *The continuance or reintroduction of non-residential use only where there is a historic basis for such a use, or where non-residential use will significantly contribute to the retention of historic character and not impact on residential amenity.*

**Objective 8:** *Maintenance of a pleasant and functional living environment broadly meeting the needs and expectations of local residents.*

## **PRINCIPLES OF DEVELOPMENT CONTROL**

### **General**

1 *Development should not be undertaken unless it is consistent with the desired character of the zone and the relevant policy area.*

2 *Development should preserve, enhance and reinforce the existing streetscape appeal of the relevant policy area.*

### **Form and Character**

13 *Development should conform to the City Wide provisions of the Development Plan applicable to that type of development, unless conformance with those provisions significantly diminishes the heritage value or historic character of a place.*

14 *The detail and general character of development should complement the identified heritage values of the zone and the policy area in which it is located, as well as the specifically identified heritage places and contributory items listed in Tables NPSP/5, 6 and 7.*

15 Development should predominantly be for residential purposes and should reflect the historical built form and visual character of the relevant policy area.

16 Development of a new building or building addition should demonstrate a compatible visual relationship with the buildings that contribute to the historic character of the relevant policy area through consideration of the following:

(a) bulk and scale;

(b) width of site frontage, front and side boundary setback patterns, wall height and window placement;

(c) the proportions (vertical and horizontal) of additions visible from the street that complement the existing building façade and other elevations facing a public road.

19 Development should not exceed the maximum building height prescribed for each policy area. The height of new buildings, should be consistent with the prevailing building heights with particular reference to adjacent State and Local Heritage Places and contributory items.

21 Redevelopment of corner sites comprising buildings that are not identified heritage places or Contributory Items should provide facades to each street frontage and should complement the siting of heritage places and/or contributory items on the adjacent corner sites.

26 Development within the Residential Historic (Conservation) Zone should be carried out, where applicable, in accordance with the Design Guidelines for Heritage Places and Development in Historic (Conservation) Zones contained in Table NPSP/4.

#### **Interface Height Provisions**

14 To minimise building massing at the interface with residential development outside of the zone, buildings should be constructed within a building envelope provided by a 30 degree plane, measured from a height of 3 metres above natural ground level at the zone boundary (except where this boundary is a primary road frontage), as illustrated in Figure 1:

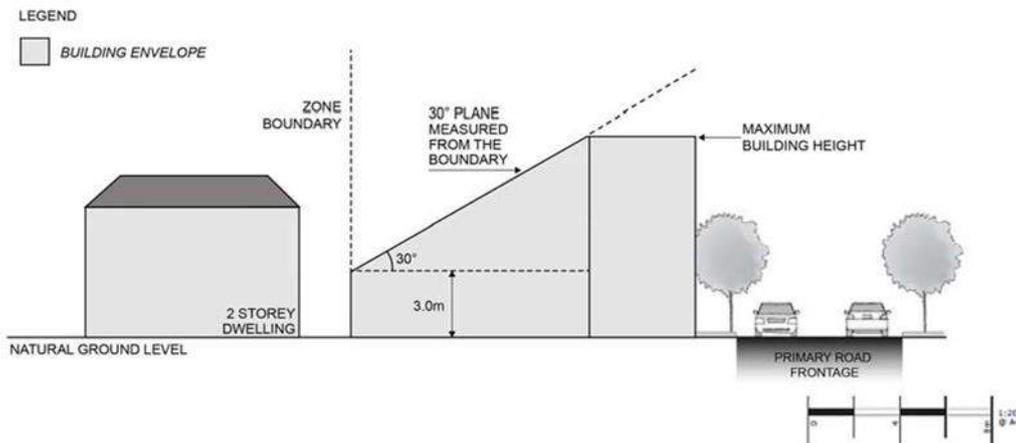
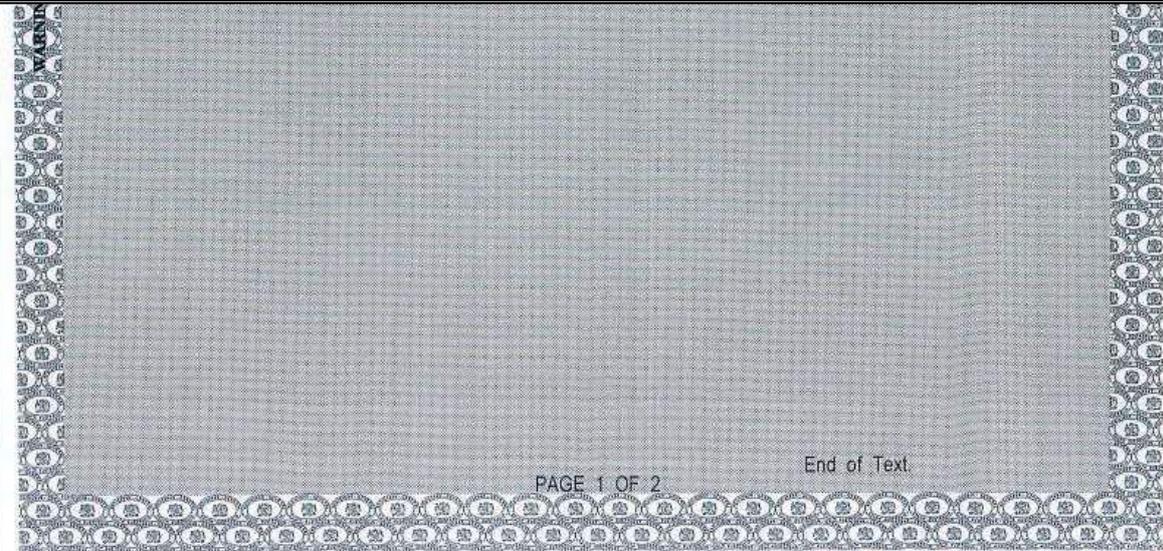
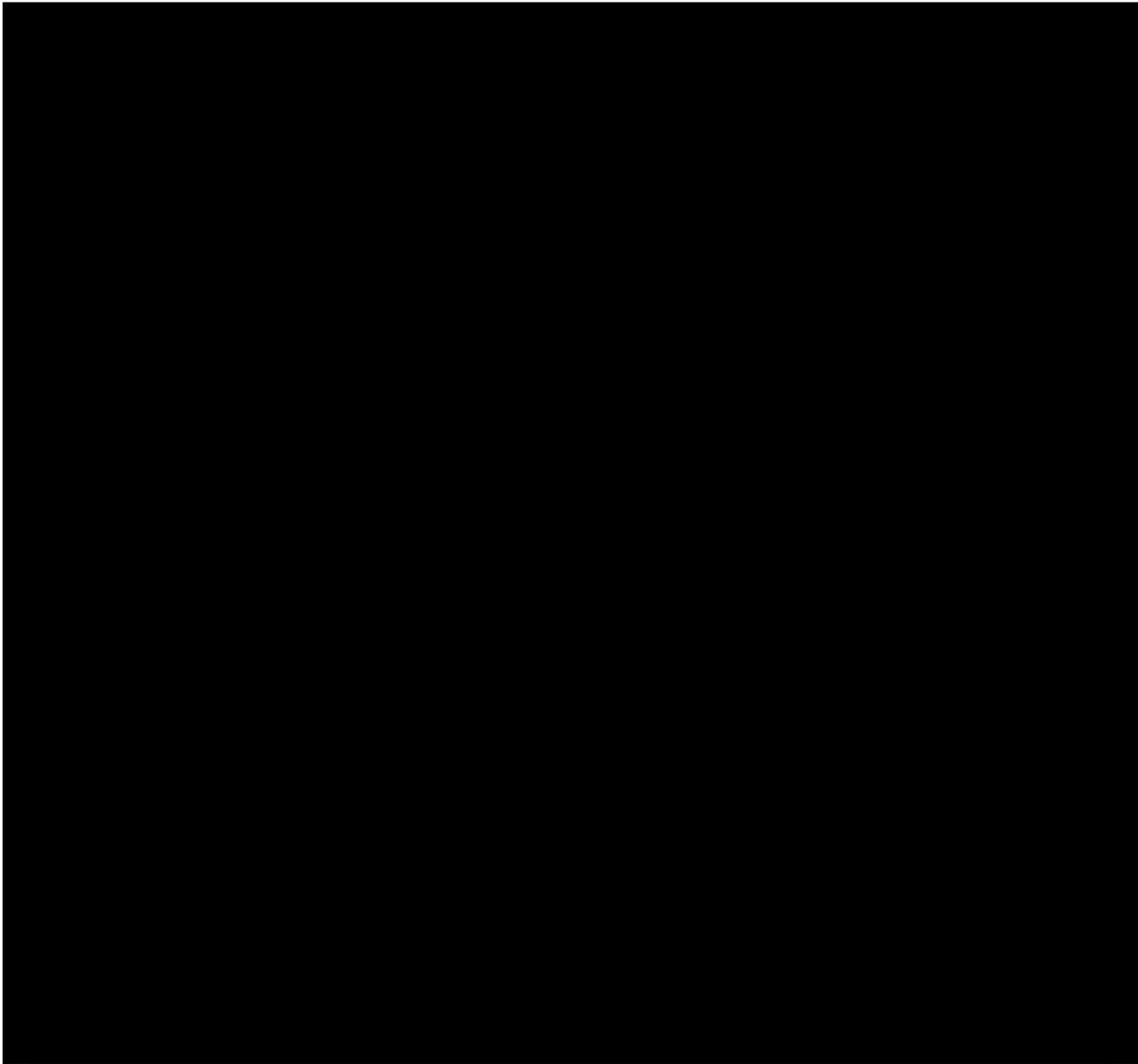
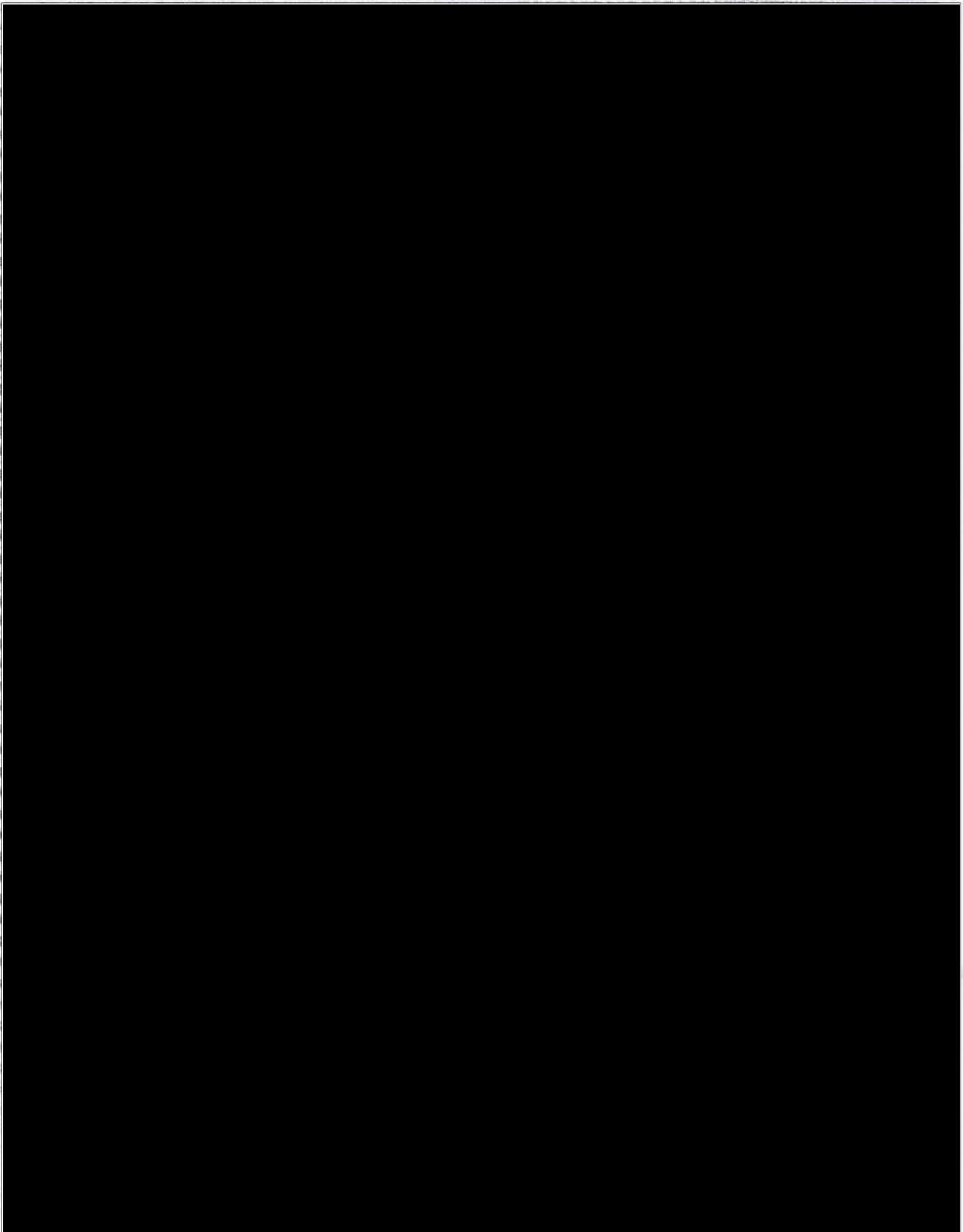


Figure 1"





PAGE 2 OF 2

[Redacted]

7 November 2014

[Redacted]  
KENSINGTON SA 5068

[Redacted]

**Development Application No:  
Proposed Development:**

**155/674/2014  
Construction of an attached  
verandah and new side fencing  
(adjacent Bowen Street frontage)  
[Redacted] KENSINGTON 5068  
[Redacted] Adelaide CT**

**Location of Proposed Development:  
Property Identification:**

**Application for Development Approval**

I wish to advise that the above mentioned application has been approved.

As required by Regulation 45 of the Development Regulations 1993, as owner of the land upon which the above mentioned development is proposed, please find attached a copy of the Decision Notification Form and other documents which have been forwarded to the applicant.

Should you require any further information or assistance, do not hesitate to contact me.

Yours sincerely

Josh Edginton  
**DEVELOPMENT OFFICER-BUILDING**



City of  
**Norwood  
Payneham  
& St Peters**

175 The Parade  
Norwood SA 5067

PO Box 204  
Kent Town SA 5071

Telephone  
8366 4555

Facsimile  
8332 6338

Email  
townhall@npsp.sa.gov.au

Website  
www.npsp.sa.gov.au



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[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 11:08 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine Corp Kensington

I am a resident of Norwood and I oppose the proposed variation to the building planned for Peregrine Corp on the corner of Portrush Road and the Parade. The building itself is unattractive and out of context in an area with a distinctive heritage character including two classic churches/halls. I'm surprised the building proposal itself was approved.

The inclusion of a helipad (it appears there are in fact 2 helipads) further degrades the appearance of the building - in addition having helicopters fly over and land in Norwood is totally inappropriate. The statement that the pads will be used for no more than 10 days per year is surely the thin edge of the wedge.

Please do not grant approval.

[REDACTED]  
[REDACTED]  
Norwood  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 11:12 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** proposed helicopter landing facility

Dear Minister for Planning

I am writing in regards to the proposed Peregrine Helicopter Landing Facility. According to the Peregrine Corporation Helicopter Landing Facility Public Environment Report (Peregrine Corporation, 2019), there appears to be no correlation between the findings in Appendix K (page 232 of pdf) and the "Consequences of Proposal not Proceeding" outlined in Section 6.4 (page 32 of pdf). Peregrine's business operations, growth, advantage and/or economic and employment benefit will not be impacted by the construction of the Helicopter Landing Facility. The usage forecast has been identified as "no more than 10 days per year" (see Executive Summary) and not proceeding with the construction of the Helicopter Landing Facility would seem to have little further negative impact on the local economy or employment as outlined in Appendix K as the rest of the development proposal will be proceeding.

Also, given the recent high profile deaths in helicopter crashes of [REDACTED], his daughter and seven others and of Leicester City Football Club owner Vichai Srivaddhanaprabha and four others in a car park outside the stadium, I have serious misgivings about public safety with private helicopter use in close proximity to local schools, residential and shopping areas to the proposed landing facility. I also oppose the use of schools as emergency laydown areas as the helicopter proposes to be operated only during daylight hours when this type of facility is arguably at maximum capacity with staff and children.

For these reasons I oppose the proposed Peregrine Helicopter Landing Facility.

Regards

[REDACTED]



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name .....  
Telephone .....  
Address .....  
Email .....

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

safety (aviation) in residential area  
use of public school for private enterprise  
noise disturbance  
safety of children



Government of South Australia  
Department of Planning,  
Transport and Infrastructure



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

refuse for proposal to proceed.

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



Government of South Australia

Department of Planning,  
Transport and Infrastructure

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 11:38 AM  
**To:** DPTI:State Commission Assessment Panel  
**Cc:** [REDACTED]  
**Subject:** Peregrine Helipad

The Minister of Planning  
[REDACTED]  
Department of Planning and Infrastructure  
South Australian Government

Dear Sir,

I write to ask that approval not be given for a helipad on top of the proposed headquarters of Peregrine Corporation on the SE corner of The Parade and Portrush Road.

There are several objections that I have with this development.

- 1 The frequency of take-off and landings is not limited to 8 trips, 16 take offs and landings over 10 days per year. Should the helipad be approved, the frequency will escalate and there will be no opportunity to scale back the activity. Residential amenity will be effected by having helicopters landing in a residential area.
- 2 Having helicopter activity in the school zone will distract children, parents, trucks. Potential for high speed crashes, with trucks hitting crowded bus shelters will be catastrophic.
- 3 The noise pollution of over 85 decibels for extended periods can cause permanent hearing loss. I refer to the levels of noise [www.howsyourhearing.org](http://www.howsyourhearing.org) website. The frequency and duration of the activity will be detrimental to the residents of the area.
- 4 The stated noise levels at the community event into this matter at the Norwood Town Hall said the landing levels to be 83 Db. The table attached from this published article [https://www.acoustics.asn.au/conference\\_proceedings/AAS2012/papers/p21.pdf](https://www.acoustics.asn.au/conference_proceedings/AAS2012/papers/p21.pdf) suggest the levels to be much louder:

### Example helicopter noise levels

Helicopter noise levels can be an important parameter to define in an analysis, and is often difficult to source for specific aircraft due to limited publically available test data. In very broad terms, sound power levels of modern EMS helicopters are generally of the order of  $L_{WA}$  127dB at idle in the human audible range, increasing 7 to 12dB at takeoff and also in the final stages of approach (flare).

Western Australia currently has as the State rescue helicopter Bell 412 EP which is among the loudest current EMS helicopter operating in Australia, with future civil EMS types (AW139/EC175/AW609) understood to have a smaller noise emissions envelope than the Bell 412.

Norman Disney & Young have conducted noise levels measurements of Bell 412 aircraft landing and taking off from a helipad. Typical noise level measurement results are listed in Table 3.

**Table 3.** Bell 412 typical take-off and landing  $L_{maxF}$  at 100m distance from helipad

Aspect	Octave Band Centre Frequency (Hz)							A-wt Sum dB(A)
	63	125	250	500	1k	2k	4k	
Helicopter path perpendicular to observer to helipad								
Take off	95	92	91	87	86	82	76	91
Landing	91	85	87	83	80	82	74	87
Helicopter path directly overhead								
Take off	89	98	95	92	91	87	81	95
Landing	96	98	97	96	89	84	77	96

- 5 The 2012 article identifies noise attenuation actions that need to be taken to reduce the noise levels. The design that Peregrine proposed has no noise attenuation designs.
- 6 Property values will be effected by this proposal. [REDACTED] Kensington Park and my property value will be effected by this activity.
- 7 Adelaide is indeed fortunate to have an international airport close by. There is no need for a helipad in the eastern suburbs when Adelaide Airport is just 10 minutes the other side of the city. Tokyo's main airport is 2.5 hours away and yet they do not allow helicopters in the capital. Clearly this has not held Tokyo back. The same should be said of any activity in Adelaide needing helipads for their development. <https://www.bloomberg.com/news/articles/2016-05-19/why-tokyo-has-the-most-rooftop-helipads-and-doesn-t-use-them>
- 8 The emergency landing sites are school ovals and this is most concerning for the welfare of the school children. Should a helicopter need to land in the open field, and a fire ensure, PFAS, highly toxic flame controlling material will pollute the ovals for years to come.
- 9 Helicopters are high risk air transport vehicles.
- 10 The noise of aircraft across the flat plains of Adelaide can be heard in Kensington Park. The noise from helicopter landing will be heard from a much larger area than the modelling proposed.
- 11 The Clayton and Wesley Uniting church windows may be damaged and church structure effected.

Like all good engineering proposals, a proof of concept needs to be conducted. I suggest that Peregrine should conduct 10 fly overs during a day when Norwood is being frequented. A good time may be the Christmas Pageant. Surveys of the crowd should be conducted to see how favourable the development is to the amenity of the area.

I am with many others in protesting against this development.

I look forward to your support in this matter.

Kind regards,

[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 11:59 AM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Comments on Peregrine Corporation Helipad proposal

Minister for Planning  
[REDACTED]  
Unit Manager Policy and Strategic Assessment  
Planning & Land Use Services  
Department of Planning, Transport and Infrastructure

Dear Minister

**Comments on Peregrine Corporation Helipad proposal**

My name is [REDACTED] I live at [REDACTED] Norwood 5067.

I am opposed to the development in its existing form for the reasons set out in the “Final Development Report” to Norwood, Payneham and St Peters Council submitted to the Council on 2 March 2020.

In particular I am concerned about

- \* The safety risks associated with the development
- \* The lack of a sufficiently detailed mechanism for regulating the use of the proposed facility for up to 10 days a year, and
- \* The loss of amenity through noise from helicopter movements.

As a resident of Norwood for 20+ years I can attest to the noise from occasional helicopter overflights which I assume are caused by emergency situations. I do not wish to see what appears to be essentially a corporate hospitality function imposed on the neighbourhood when other options, eg Adelaide Airport, are available.

Thank you for providing the opportunity for me to comment.

Yours sincerely

[REDACTED]  
[REDACTED]  
Norwood 5067

[REDACTED]  
[REDACTED]

Sent via iPad

[REDACTED]

---

**From:**  
**Sent:**  
**To:**  
**Subject:**

[REDACTED]  
Friday, 13 March 2020 11:59 AM  
DPTI:State Commission Assessment Panel  
Peregrine Mixed Use Major Development - Variation 2 Helicopter Landing Facility

To whom it may concern,

I would like to register my opposition to the above development. I can not believe that a school oval is even for consideration. Clearly student safety has been blatantly disregarded. Absolutely nothing could be done to address my concerns.

Regards

[REDACTED]

[REDACTED]  
[REDACTED]  
Kensington, SA 5068

Minister for Planning  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

[REDACTED]  
13 March 2020

[REDACTED]  
I would like to report my objection to the proposed helipad on the Peregrine site for the following reasons

1. The risk associated with the helicopter. Helicopters are involved in around 25% of aviation accidents even though they only account for 14% of Australian VH registered fleet<sup>1</sup>. It does not make sense to introduce this risk in such a highly populated area when the airport is only 20 minutes away by car.
2. The noise level will be unbearable (for take off and landing), and a cut off of 10 pm is too late for most people as most will be trying to sleep well before then, particularly young children, the elderly and those who start the day early.

Residential living areas between 7am-10pm should not have noise levels exceeding 52 dB(A)<sup>2</sup>  
And it even exceeds the commercial and industrial land use categories (62-65 dB(A) max).  
^this is according to the EPA in 2013 thought.

3. It will have a severely negative effect on the value of my property.

I hope you seriously consider my objections and put a stop to this unnecessary risk in what is effectively my backyard.

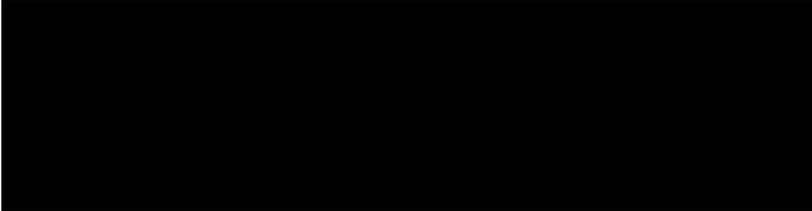
Yours faithfully,

[REDACTED]  
<sup>1</sup> p15 Aviation Occurrence Statistics 2008-2017, [https://www.atsb.gov.au/media/5776642/ar-2018-030\\_final.pdf](https://www.atsb.gov.au/media/5776642/ar-2018-030_final.pdf)

<sup>2</sup> <https://www.doc.govt.nz/contentassets/9196fd362afe4382a82b6d7f24bbf008/hokitika-airport-ltd-assessment-noise-effects.pdf>

# **Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility**

**This submission is from:**



**What is your interest in this proposed development?**

Local resident.

**What is your overall position on the proposed development?**

I vigorously oppose the development.

**Do you have concerns regarding the proposed development?**

## **Need for a helipad**

Other, larger corporations in South Australia, e.g. Santos, do not require helipads to be able to successfully carry-out their business, and have not applied for a helipad. It is therefore clear that the smaller Peregrine Corporation really does not require a helipad either.

Peregrine have applied to fly a max. of 10 days a year for business purposes, particularly to fly people to and from their motor sport facility at Tailem Bend (The Bend). If this is truly the case, and they only intend to use the proposed helipad for 10 days a year, then then spending such a large amount of money on such a heliport facility could be regarded as most unusual, particularly as they could use the heliport at their home, in the Adelaide foothills, at Burnside, for such purposes. It is closer to The Bend than Kensington, and only a short, 2 to 3 km drive away from Kensington. In fact, to fly from their proposed helipad at Kensington to The Bend, they would essentially fly over the top of their existing helipad attached to their home. There is therefore no requirement for the helipad at Kensington.

## **Hours of operation**

At the public forum, questions were asked about how the ten day limit would be enforced and what the penalty would be if the limit was broken. No information was forthcoming.

Ten days is the max. number of days Peregrine are allowed to fly without a special licence. At the public forum, Peregrine made it clear that they would very much like to fly helicopters to and from the site much more often. It is therefore expected that Peregrine will apply for a special licence, and fly more often.

Peregrine will be flying during “daylight hours”. For aircraft, this is earlier than sunrise and later than sunset. Peregrine can begin to fly from “first light”, which is when light first appears on the horizon, when the sun is

still below the horizon. To all intents and purposes, it is still dark. This means that, at the height of summer, helicopters can start to fly from the Kensington site as early as 4.52am and fly until 9.35pm.

At the public forum, Peregrine admitted that the days of operation include Saturdays and Sundays and they would be doing multiple take offs and landings per day.

The Civil Aviation Safety Authority (CASA) has informed me that, because this is a helicopter landing site on private land, there is nothing stopping Peregrine from flying at night, except for the cost of setting things up for night flying.

### **Two helicopter pads on the building**

Peregrine are saying that they will fly only one light helicopter for 10 days a year, landing it on an aluminium landing pad. If that is truly the case, why do they need two helipads? At the public forum, Peregrine stated that the second helipad was for emergency use, by other helicopters in the area. However, this is an absurd proposition, given that so few helicopters fly over Kensington. From my memory, only one or two helicopters have flown over Kensington in the last sixty years. Furthermore, if Peregrine truly intended to use one helipad for 10 days a year, then a single helipad could be used as an emergency landing site for the other 355 days a year, negating the need for a second helipad. In addition, Peregrine showed numerous identified emergency landing sites for helicopters in local school ovals, that far outnumber Peregrine's single, extra "emergency" landing pad. It is therefore clear that this extra helipad is not for emergency use at all.

It is important to note that the second "emergency" landing pad is made of concrete. This concrete pad on the roof plus the weight of the helicopter on it would require structural strengthening of the whole building, an expensive exercise, adding to the evidence that it not for emergency use by others. Concrete helicopter pads are used for larger and heavier helicopters. It is therefore clear that Peregrine intend to fly larger, and therefore louder, helicopters in the future.

At the public forum, I asked what constituted an "emergency" that would necessitate the use of the concrete pad? Would it be that the aluminium pad was occupied with a Peregrine helicopter when a second Peregrine helicopter wanted to land? I did not get a reply to this question from Peregrine. I got a reply to an unrelated question.

It is therefore obvious that Peregrine intend to build two helipads at Kensington because they intend to fly two helicopters at once, one of which would be larger, heavier and louder than the helicopters they are currently suggesting that they will use.

Please note that they will not have a control tower on the building to direct the movement of two helicopters at once. This significantly increases the risk of helicopters colliding.

The proposal is equivalent to an airport with two runways and no control tower, in a medium density residential area, with housing right next to the runways.

At the public forum, an argument was used by Peregrine that the concrete helipad would not be used routinely because it would need to be fitted with automatic firefighting equipment, and that it would be too expensive to retrospectively fit that equipment. However: (1) compared to the cost of building the building, the cost of putting in firefighting equipment would be minor, (2) Peregrine may choose to use the concrete helipad, without any firefighting equipment, in an apparent "emergency", which may be as simple as a Peregrine helicopter wanting to land on the building while the "official" helicopter pad is already occupied by another helicopter, and (3) they have yet to apply for building approval for their building and they could simply and quietly incorporate the extra firefighting equipment into their building plans.

## **Private, unregulated airport**

At the public forum, we heard that, because the helipad is on private land, if it is approved, it will function as an unregulated airport.

CASA has stated that a private helicopter landing site (HLS) is outside much of local and Federal Government jurisdiction. The helicopter pilot makes all the relevant decisions, and makes them at the time of flying, about such matters as how the helicopter should be operated, including what type of helicopter to use and hence how noisy it may be, which flight path the helicopter should take, what direction the helicopter should take when landing and taking off, over which buildings the helicopter will fly, how high the helicopter will fly, how long the helicopter will stay on the helipad with the engine running, and what level of fog, rain, cloud cover, wind speed, wind direction, and instrument malfunction would be sufficient to prevent or abort take-off and landing. Such matters are completely at the discretion of the pilot on the day. And Peregrine cannot predict them in advance.

Therefore, all the reassuring statements made by Peregrine about how their helicopters will operate, including any projected flight path, could be regarded as false and misleading, as Peregrine cannot, and should not, make such decisions for the pilot. Peregrine cannot predict in advance how a particular pilot will operate the helicopter on a given day under the circumstances of the day.

## **Safety**

Peregrine's proposed take-off trajectory from their Kensington site takes helicopters close to the spire on the adjacent church. The masonry spire is topped by a tall, hard-to-see iron spire, that appears to be taller than the helipad. If a helicopter clips the spire, e.g. because the spire cannot be seen in fog or heavy rain, the helicopter could crash-land in the middle of the busy intersection of Portrush Road and The Parade. Note that B-double petrol tankers travel through the intersection. Alternatively, the helicopter could crash into the hi-rise residential complex immediately to the west of the Peregrine building, or crash into one of three heritage-listed buildings on the other three corners of the intersection. Consequently, the risk of a helicopter crash at the site could be regarded as unacceptably high, and the consequences of such a crash could be a catastrophe.

While there are certain distances that drones are required to keep from "normal" airfields, there appear to be no such requirements for a private airfield such as the proposed Peregrine site. This leads to safety concerns when drones interact with Peregrine's helicopters. Such an interaction could down a helicopter. Already, local ovals within a kilometre of the Peregrine site are often used to fly drones for recreational purposes. The use of drones is projected to grow exponentially in the near future as a tool to deliver parcels and take-away food. Note that The Parade at Norwood contains many businesses within a short distance of the proposed helipad that may employ drones for these purposes in the near future.

The identified emergency landing sites for locally-flying helicopters are local school ovals. These are playing areas for children, some as young as five during school hours, and even younger outside of school hours. Many of these ovals are used by the community as recreational space outside of school hours. Young children in particular may find it difficult to successfully run away from a gyrating helicopter, crash-landing into their playground. Moreover, there are high-voltage lines across one of these proposed ovals, at Marryatville Primary School. The audience at the recent public forum took particular offence that their children could be put at such risk. While it is understood that these are identified emergency landing places for any helicopter, the enormous increase in helicopter traffic due to the Peregrine site, over previous almost-non-existent levels, results in a significantly increased risk to children in the area.

## **Noise**

At the public forum, it was stated that once a helicopter got close to its landing site, there would be noise suppression by the helideck. But the film shown at the forum showed a helicopter landing on a helideck that consisted of a large field of solid earth, rather than what is being proposed here, being a circular helicopter

pad, raised into the air on the top of a building. I asked how the latter would suppress noise by comparison. I did not get a reply to this question from Peregrine. I got a reply to an unrelated question. It should be noted that low pitch noise washes downwards to nearby buildings, and one of those nearby buildings is a church with antique and fragile stained-glass windows. Another building is a multi-storey residential housing complex.

At the public forum, we heard that there are no noise limits for landing sites on private landing fields in SA.

While Peregrine state that they will pick-up, set-down and depart, without lingering on the helipad, there is no requirement for them to do so. There is nothing stopping Peregrine's helicopters from lingering on their helicopter pad, except for any cost considerations from running the engine of the helicopter.

Peregrine paid Sonus to undertake a noise study for them. However, there are several issues with Sonus' modelling. Most importantly, the modelling was done using assumptions rather than evidence.

First, Sonus assumed that a helicopter would not be heard to any appreciable extent while it was in flight, except for the last few metres of the flight path, being just before landing and just after taking-off. Hence Sonus only considered the noise produced by helicopters less than a kilometre from the landing site.

Second, Sonus assumed that helicopters would only come in to land from the south-west of the Peregrine building and take off towards the north-east of the Peregrine building. This proposed flight path appears to have been chosen because it runs approximately over the top of Portrush Road, a busy and noisy road. Sonus then stated that the noise of a helicopter would not be heard appreciably above the noise of the traffic on that road.

It should be noted that Sonus did not actually fly any of the proposed helicopters over the proposed flight path and actually measure the amount of noise produced. They did not actually measure whether such helicopters could be heard above background traffic noise, and they did not actually measure the level of additional noise produced from doing so.

Third, it was admitted at the public forum that helicopters need to change their flight direction to land, according to the wind direction at the time of landing. Sonus only modelled one flight path, not all likely flight paths that include flights over nearby quiet suburban streets. Consequently, Sonus did not measure background noise levels in nearby suburban streets near the site. Nor did it calculate how loud helicopters would be above background noise levels in those streets.

Fourth, once the proposed helipad is built, there is no requirement for Peregrine to keep to their proposed flight path. In fact, it would be counter-productive for them to do so. Peregrine has stated that the main reason they need a helipad at Kensington is to fly people between their Kensington site and The Bend. The Bend is to the south-east of the Kensington site. The most direct path between the two sites is therefore for a helicopter to land and take off to the south-east of the Kensington site, over housing in Kensington, Marryatville, Leabrook, Erindale, Hazelwood Park and Burnside. The same occurs if they wish to fly between the helipad at their home in the Adelaide foothills at Burnside, and their proposed helipad at Kensington.

It should be noted that if Peregrine does stick to their proposed landing and take-off proposal, then in order for the helicopter to land, the helicopter will need to swing around from its natural approach from The Bend or the Shahin family home, both positioned to the south-east of the landing site, around to line up with Peregrine's stated final approach, being to the south-west of the landing site, in order to land. This would take the helicopter in an arc over housing in Heathpool, Marryatville, Toorak Gardens and Norwood at low altitudes. When taking off, the proposed flight path would require a helicopter to swing around from the proposed take-off in a north-west direction away from the Kensington site, around to the south-east to head to The Bend or the Shahin family home, over housing in Beulah Park, Kensington and Kensington Park at low altitudes.

The closer a helicopter is to the ground, the more noise it makes at ground level. It is clear from the video shown at the public forum, that helicopters tend to take off and land at a shallow angle to the ground, so that

they can produce considerable noise for several kilometres as they gradually rise into the air when taking off, and when they gradually descend to land on a helipad. If the helipad at Kensington is built, Peregrine may therefore, depending on their chosen flight path for a given flight, chose to fly at low altitudes over any of these suburbs: Kensington, Norwood, Marryatville, Leabrook, Erindale, Heathpool, Toorak Gardens, Beulah Park, Kensington Park, Hazelwood Park and Burnside.

If their owners of Peregrine choose to fly a helicopter between their home at Burnside and their office at Kensington, the noise may be considerable, because why would they chose to raise the helicopter high into the air, away from rooftops, for such a short distance? It would be a waste of fuel. Such helicopter flights could therefore be expected to be particularly noisy for affected suburbs.

Fifth, Sonus did their modelling on the basis that the helicopters would not be heard above the traffic on a busy main road, containing numerous large trucks, when measured at ground level. Traffic noise is heavily filtered at ground level by the masonry walls of buildings, so that houses and school buildings positioned a few buildings away from a main roads can experience considerable quiet. In contrast, the noise from a helicopter comes from above, through the roof. This is not filtered-out by masonry walls from other buildings. A sheet of colorbond a few millimetres thick on a roof does not make a good sound barrier. The noise of a helicopter flying overhead is similar to the noise of a jackhammer.

It should be noted that helicopters may fly at low altitudes over the following eight schools, situated within a kilometre of the helipad: St Ignatius, Mary MacKillop College, Marryatville High School, Marryatville Primary School, Pembroke, St Joseph's Memorial School, Loretto College and Mckellar Stewart Kindergarten. Between them, these schools contain thousands of children. There has been no consideration of the possible effects of Peregrine's helicopters on the ability of these children to learn underneath substantial helicopter noise, nor has there been any consideration of the financial viability of these schools if parents start to remove their children from these schools due to helicopter noise, particularly if Peregrine gets its stated desire to fly far more often than 10 days a year.

It is therefore expected that the amount of noise from Peregrine's postulated helicopter airport will severely impact thousands of people in local residences, schools and businesses.

### **What could be done to address your concerns?**

The proposed helipad should not be built. It is an absurd proposition for the site.

When Peregrine replies to criticisms of its planned helicopter facility in Kensington, as part of the planning process, it should be noted that any assurances from Peregrine about what it intends to do, and what it does not intend to do, are worthless unless Peregrine is legally bound to any apparent commitments that it makes.

### **Other general comments:**

There is a great deal of shock, bewilderment and anger in the community that the helipad is being seriously considered. People at the public forum angrily asked whether Peregrine Corporation or the Shahin family had made political donations to the Liberal Party.

The situation is not helped by Peregrine Corporation boasting about its links to the SA Government on its website: "Recent developments include a 3,000 sqm office building which was fully leased to the State Government" ([peregrine.com.au/our-business/peregrine-property](http://peregrine.com.au/our-business/peregrine-property)). The State Government, as the tenant, therefore pays considerable rent to Peregrine, as the landlord, for office space. This close relationship could be regarded by some as generating a conflict of interest for the Government when assessing Peregrine's proposed helicopter landing site in Kensington. Perceptions are not helped when approval for the helipads is a decision for the Minister for Planning of that Government, and the Minister can choose to ignore submissions, or advice from his Department, when making his decision.



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

## TELL US WHAT YOU THINK

*Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.*

Name [REDACTED] ..... Address .....  
Telephone ..... Email [REDACTED] .....

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

I strongly believe that it is a very inappropriate location for helicopters as the building is too low for the purpose, too close to schools, roads and neighbouring buildings.

There is no public good in the proposal. The air space is for all. Transporting business clients to and from a race meeting is not a good enough reason.

The noise and safety risk are too high.

Perhaps move the office tower to a more appropriate location? It hasn't been built yet.



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

## What could be done to address your concerns?

Move the office building to a more appropriate location, where the height is properly zoned for.

## Other general comments:

The building should never have been approved for development in the first place. It is not a major state development, it is an office building.

The loss of public trust is significant.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
[REDACTED],  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[REDACTED]



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 12:43 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine Mixed Use Major Development Variation 2 Helicopter landing facility

**Importance:** High

Minister for Planning  
[REDACTED]  
Department of Planning, Transport and Infrastructure

Dear Sir

I am writing in response to the call for submissions regarding the Application by Peregrine Corporation to vary the approved development at 270 The Parade, Kensington, to include a Helicopter Landing Facility.

I am a nearby resident of this development and am opposed to this variation for the following reasons:

The noise generated by helicopter movements above my residence will be significant. I am also concerned by the added risk of serious accidents in such a heavily populated residential area.

The application is for a maximum of 10 days per year which seems to me to be of small material benefit to the Peregrine organisation considering the extra costs involved. Do the owners of the Peregrine Corporation anticipate they will be able to increase the number of flights once given approval for the helipad? Or do the owners consider any prestige attached to owning such a facility recompense enough?

I note that the concrete pad will be made available for "emergencies". Who defines what an emergency is in this case? Is it the owners/representatives of the Peregrine Corporation? or South Australian Emergency Services organisations?

I am very concerned that helicopter movements will be more than the 10 days specified in the Application.

In conclusion, The Liberal government have had a policy for nearly 20 years to reroute heavy commercial traffic away from Portrush Road and our community. Each time they win government they have excused themselves from doing so for reasons of cost.

I would be very disappointed if this government now allows even more noisy infrastructure to be built in our suburb?

Yours faithfully  
[REDACTED]  
[REDACTED]

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 12:54 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Fwd: Peregrine Mixed Use Major Development Variation 2 Helicopter landing facility

**Importance:** High

Please note my residential Address is

[REDACTED] Norwood, 5067

I inadvertently did not include it in my submission sent to you a few minutes ago.  
[REDACTED]

Minister for Planning

[REDACTED]  
Department of Planning, Transport and Infrastructure

Dear Sir

I am writing in response to the call for submissions regarding the Application by Peregrine Corporation to vary the approved development at 270 The Parade, Kensington, to include a Helicopter Landing Facility.

I am a nearby resident of this development and am opposed to this variation for the following reasons:

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The application is for a maximum of 10 days per year which seems to me to be of small material benefit to the Peregrine organisation considering the extra costs involved. Do the owners of the Peregrine Corporation anticipate they will be able to increase the number of flights once given approval for the helipad? Or do the owners consider any prestige attached to owning such a facility recompense enough?

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In conclusion, The Liberal government have had a policy for nearly 20 years to reroute heavy commercial traffic away from Portrush Road and our community. Each time they win government they have excused themselves from doing so for reasons of cost. I would be very disappointed if this government now allows even more noisy infrastructure to be built in our suburb?

Yours faithfully

[REDACTED]

[REDACTED]

[REDACTED] Norwood 5067

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 12:37 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Helipad in Norwood

[REDACTED] State Minister of Planning

Dear Sir

I adamantly oppose the proposed helicopter pad on the corner of The Parade and Portrush Rd and I wish my opposition to be noted.

As a Norwood resident I use the intersection frequently. It is an exceedingly busy intersection that will become even more dangerous with the noise and movement of a helicopter in close proximity.

A helipad will detract from the heritage ambience of the precinct and may place the stability of the spire of Clayton Church at risk.

I would hope that the widespread opposition to this development is considered in processing the application.

Yours sincerely,

[REDACTED]  
Norwood. SA. 5067

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 12:43 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility - submission  
**Attachments:** PeregrineSubmissionDMG.pdf

Minister for Planning  
[REDACTED],  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[REDACTED]

I am a local resident, and live approx 400 metres from the Peregrine site.  
I oppose the development. Please find attached my written submission.

Kind Regards

[REDACTED]  
[REDACTED]  
KENSINGTON SA 5068  
[REDACTED]  
[REDACTED]

## INTRODUCTION

This development Variation represents a unique situation. To the best of my knowledge and research, there are no other privately owned/operated (rooftop) helipads in CBD/metro areas anywhere in Australia. All rooftop helipads are on hospitals. In Adelaide there are only 3 - Lyell McEwin, Flinders and Royal Adelaide.

No corporation (small, large, or multi-national) in Australia has a rooftop helipad.

Ordinarily, the approval process to build a helipad rests with the Local Government authority. In Australia there have only been a few applications to build private rooftop helipads. The most recent was in South Yarra, Melbourne. It was refused. Stonnington Council said the proposed helipad was an "incompatible use within a high density mixed use activity centre and does not achieve appropriate land use separation distances from nearby sensitive residential areas".

The other unique aspect is that this is a Variation to a development which has already been declared (and approved) as a Major Development, and is subject to the same assessment process. This means that it is not subject to the normal Local Government development regulations and approval process. Although not specified in the Development Act, the Major Development assessment process is presumably a balanced consideration of environmental, social and economic effects of the development.

The PER Guidelines ask for Peregrine to state the need for the proposal, and also to address various assessment issues, the critical being "Aviation Operations" and "Neighbourhood Interface". In the sections below I will try to outline my views about various issues.

## NEED FOR THE PROPOSAL

The PER Guidelines state that the PER should include a statement of the objectives and justification for the proposal.

In various sections of the PER, the following statements are offered by Peregrine in support of the Variation. My comments follow each item.

*"redevelopment of the site involves an investment of over \$50 million in the South Australian economy"*

The \$50 million relates to the building per se, which has already received approval. It has no relevance to this Variation (helipad). There has been no additional economic benefits identified relating to the helipad. From PER Appendix K: *"The proposed helicopter landing facility ... is not expected in its own right to have an economic or employment impact"*

*"the helipad is an important component for Peregrine to service its business needs. The need for quick, accessible transport is paramount to ensuring a pleasurable experience for overseas and interstate business guests."*

This states that a "pleasurable experience" for guests is important. Surely Peregrine can think of other ways to provide a "pleasurable experience" rather than offering helicopter rides.

*Visitations are expected to be infrequent however each visitation is crucial in securing more business and retaining head office operations in this state."*

"Crucial"? If it is so important, then one would expect some supporting information. None is provided.

Also, is Peregrine suggesting that they could move their head office if not granted approval? This was not stated as a "consequence of not proceeding" in the original (building) Development Report. No supporting explanation or evidence is given.

*"The helipad is necessary to support a major event at The Bend Motorsport Park, which is an event of significant economic significance to South Australia"*

Why it is "necessary" has not been explained. The only benefit seems to be a quicker travel time to Tailem Bend - 30 minutes by helicopter, 60+ minutes by car.

Furthermore, the consequences of not proceeding with the proposal are given as:

*"The efficiency of Peregrine Corporation's business operations will be impacted, particularly those involving interstate and overseas stakeholders*

*The continued growth of Peregrine Corporation and the follow-on economic and employment benefits to the State will be impacted*

Are these the consequences of not having a helipad? They are simply not credible.

*"Peregrine Corporation's advantage with interstate competitors will be impacted."*

It is hard to see how Peregrine's advantage with interstate competitors will be impacted by not having a helipad. Yet again, no supporting explanation is given. No interstate competitor has a helipad on their building, otherwise I'm sure Peregrine would be citing examples.

Alternatively, is Peregrine suggesting that if they are first with a helipad (i.e. before their competitors), then that will give them some advantage? If this is the case, then Peregrine should provide some tangible evidence.

The statements given in the PER are minimal, vague and un-supported. Compare this with the vast amount of information in Appendices which cover how Peregrine proposes to mitigate the "negative" aspects of the helipad.

The "need for the proposal" has been far from justified.

## AVIATION OPERATIONS

A number of issues arise from aviation proposals/commitments made by Peregrine in the PER. These are discussed below.

use only 3 helicopter types - three helicopter types were "proposed" (also referred to as "preferred") in the PER. The Aviation Specialist Advice Report states that the helipad would be built to international (ICAO) standards, with largest circular dimension ('D' rating) of 20 metres, and mass load ('t' rating) of 12 tonnes. This is significantly in excess of that required for the 3 proposed helicopter types. It is actually comparable to the RAH helipad(s) (D20 / 10.0t)

This design allows much larger helicopters to be used. For example:

- Bell 412 ('D'=17m, 't' = 5.4t, 13 passengers) - currently used by the MedSTAR emergency medical retrieval service, and routinely operating to/from the RAH and other hospitals.
- Sikorsky S-76 ('D'=16m, 't' = 5.3t, 13 passengers) - personal helicopter choice of Donald Trump and (the late) Kobe Bryant.

Since the helipad is so rated, it would seem that no further approval is required to operate larger types of helicopter from the Peregrine building. This has implications for both safety and noise.

only fly in daylight hours - although night flying is generally avoided, it is permitted if the helicopter and pilot are suitably rated - i.e. this could be a possibility. (note: the helipad design provides lighting which will support night flying)

not operate on any more than 10 days - this 10-day limit has clearly been chosen to exploit a "loophole" (my description) in the Environmental Protection legislation. Within this limitation, Peregrine is exempt from any EPA regulations regarding helicopter noise. (Operation for more than 10 days would remove this exemption and require a specific license from the EPA.)

only be used for business purposes ("*no commercial flights or flights unrelated to the Peregrine Corporation to be undertaken*") - given that Peregrine is a closely-held family company, there is a possibility that the helipad could be used for family/personal purposes. Note the careful choice of words "*flights unrelated to the Peregrine Corporation*" (my underlining). Flights of a family/personal nature would not be unrelated. There will be no way to verify if flights are being used for business or personal purposes.

provide 24 hours notice of helicopter flights - this is a meaningless gesture. Is Peregrine suggesting that local residents can, with fore-warning, plan to close windows and doors as a means of limiting exposure to noise? What is advanced notice intended to achieve?

undefined flight movements - at no stage has Peregrine been able (or willing) to say how many flight movements (helicopter landings & take-offs) would occur on any given day. It is inconceivable that Peregrine cannot provide even a rough estimate in the PER, and despite being quizzed numerous times at the public meetings. This is an important issue when considering the impact of noise and safety.

The Aviation Specialist Advice Report is extensive, but mainly addresses construction and operational standards. Relatively little space is given to safety, other than identification of emergency landing locations (existing school ovals, open areas). Safety considerations are limited to some statistics on bird strike, but omits any comments or statistics for other real risks (e.g. engine failure, pilot error)

## NEIGHBOURHOOD INTERFACE

A critical "Neighbourhood Interface" issue is noise (from helicopter operations).

From the previous (building) reports, the acoustic consultants did measurements, analysis and made recommendations for noise mitigation - all aimed at ensuring that the building complied with the noise level limits set out in the Environment Protection Act.

For the purpose of this Variation involving helicopter noise, the methodology now used, by the same consultants, is to compare helicopter noise to locally measured maximum noise - e.g. a truck passing by. This method has no basis in any noise legislation. It is merely an attempt to convince residents that "it won't be that bad".

The trouble with this method is that maximum measured noise levels can be intermittent and fleeting (lasting less than a second). This is not a fair comparison when considering continuous helicopter noise, possibly occurring many times per day.

In any event, and as indicated above, the noise analysis and estimates are rendered irrelevant. Peregrine are exploiting sections of the Environment Protection (Noise) Policy & Environment Protection Act. A Helicopter Landing Facility is exempt from noise legislation, as long as the helipad is operated for not more than 10 days per year.

Within this 10-day limitation, the exemption effectively allows Peregrine to create unlimited helicopter noise without control or penalty (including the possible use of larger/noisier helicopters, unlimited flight movements, night operations).

This situation is clearly not acceptable to local residents.

## COMMUNITY ENGAGEMENT

At the Public Information Sessions, the Peregrine representatives stated that Peregrine "values its place in the local community" but its rhetoric does not match its actions. Our house is 400 metres away from the Peregrine site, but we have received no contact/material from Peregrine. We rely on media, public notices and resident groups for information.

I have contacted both the Norwood Residents Association (NRA) and Kensington Residents Association (KRA) as another way of determining the level of engagement by Peregrine. In summary:

- NRA - received an email simply providing a copy of a letter that was distributed to nearby residents. No further contact.
- KRA - held a meeting with Peregrine representatives, and asked for a Q&A session for local residents, but later was just referred to the Public Information Sessions. Requested another meeting to discuss traffic during building construction. No reply yet.

DPTI had also suggested the possible adoption of the "HAI Fly Neighbourly Guide" (Helicopter Association International, USA). This is a document that provides guidelines for helicopter noise abatement, public relations with the community and responding to complaints. One would think that this is a sensible and reasonable approach in this situation.

Peregrine's response was: *"The HAI Fly Neighbourly Guide is not relevant to this assessment and has no legislative standing."*

It is clear that Peregrine has no genuine interest in community engagement, and that its interaction with the local community will only be limited to what they regard as their legal obligations.

In terms of community feedback, I do not know of any person or organisation (schools, Councils, local business) that supports this project. The public meetings clearly demonstrated this sentiment.

The PER states *"The proposal is not considered to have any extraordinary social effects"* but there is a significant unease and resentment in the community towards Peregrine regarding this development.

## **COMMITMENTS, CONDITIONS & CONSEQUENCES**

Peregrine has made a number of commitments to mitigate the effect of helicopter operations on residents, namely:

- use only 3 (small) helicopter types
- only fly in daylight hours
- not operate on any more than 10 days
- only be used for business purposes
- provide 24 hours notice of helicopter flights

Some of these have been addressed in above sections. None of the above commitments are enforceable (with the exception of the 10-day limitation), as they will be outside the jurisdiction of the Government to control. This means that Peregrine can renege on commitments without consequences. I find this situation totally un-acceptable.

The Minister may also attach conditions to any development approval.

My reading of the Development Act [s48 (13)] indicates that any breach of conditions attached to any approval merely carries a default fine of \$1000. This amount is laughable, considering that the estimated building cost is \$50 million and Peregrine's annual revenue is \$2.5 billion.

In practical terms, it renders any imposed conditions effectively meaningless. How then does the Government propose to enforce any conditions? What are the consequences of non-compliance? These are not rhetorical questions - I would expect clear answers in any Assessment Report.

## OPINION

I was not in Adelaide during the period when approval was sought for Peregrine's office building. I have since read all the public documentation, and it is clear that all objections arose from its location - Kensington, residential, high population density, historic conservation zone.

I don't begrudge Peregrine having new modern offices. I actually like the design. I would like to work in a building like that. But...

... if Peregrine had chosen to construct its building on another (more suitable) site, there would have been little or no objection. It may have not even required Major Development status.

For example, one obvious location would have been Export Park, close to Adelaide Airport, with public transport and no parking problems. Peregrine could also have had a helipad facility.

Where the building is constructed has no significant effect on its economic benefits. The capital cost is the same, associated employment is the same.

The only benefit of building in Kensington is for Peregrine's owners, who have managed to buy the site (relatively) cheaply (\$2.6 million in 2002). The land has a local development restriction of 2 storeys, which makes it much less valuable than with no restrictions. By being declared as a Major Development, this restriction is effectively bypassed, to the sole benefit of Peregrine.

This Variation to the original development offers no identifiable economic benefit to the State or local community. It has a significant downside, mainly for the local residents. To the general public, the potential helipad is widely regarded as a plaything for Peregrine's owners and executives.

## SUMMARY

The assessment process must weigh up all (positive & negative) aspects of this Variation.

Peregrine's PER has included submissions to mitigate negative aspects of environmental and social effects (aviation noise, safety, air pollution, traffic) but has made no credible case for any economic benefit to the State or community. The economic benefits have only been described in vague statements, have not been quantified, or even estimated.

On both social and environment aspects, there are negative consequences which have not been satisfactorily mitigated. Approval of this Variation will result in conditions for the local community which are noisier and less safe, with no economic (or other) benefit. Furthermore, the critical issues will be outside the ability of any level of Government to control.

From the information provided in the PER and associated documents, no reasonable person could conclude that this Variation is justified. The arguments "for" are few, vague and unsupported. The arguments "against" are many, specific and detailed.

I urge the Minister to not grant approval.

## Marryatville High School

170 Kensington Road, Marryatville SA 5068  
T: +61 8 8304 8420 F: +61 8 8332 3228

www.marryatvillehs.sa.edu.au



13 March 2020

Minister for Planning

Department of Planning, Transport & Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

The Marryatville High School's Governing Council has been established to represent the school community in the governance of the school to strengthen and support public education in the community. Membership of the Governing Council comprises parents, students, staff and the local community.

The Governing Council has considered the proposal for Marryatville High School to be identified as an emergency laydown area for Peregrine Corporation's helicopter landing facility and wish to provide a submission on behalf of the Governing Council, along with the school's 1,396 students (February 2020 census), their families and 112 FTE staff.

The Governing Council's priority is for the ultimate care of the school's students, staff and visitors and to prevent or minimize risk to their safety.

As the proposal indicates that the helicopter would only fly during daylight hours, there would be an increased likelihood that emergency landings would occur during school hours. This would increase the risk to students, staff and visitors as this would be the time when the school is most populated.

The Governing Council does not support using the school for emergency landings as it is not clear how notification would be provided to appropriately clear the site. This is further supported by the commentary made in Appendix L of Peregrine Corporation's Public Environment Report

([https://www.saplanningportal.sa.gov.au/\\_data/assets/pdf\\_file/0007/625948/Peregrine\\_-\\_PER\\_for\\_Variation\\_2\\_Helicopter\\_Landing\\_Facility.pdf](https://www.saplanningportal.sa.gov.au/_data/assets/pdf_file/0007/625948/Peregrine_-_PER_for_Variation_2_Helicopter_Landing_Facility.pdf)), in relation to DPTI's Transport Policy:

"The risks and safety implications of utilising these areas for emergency landings should be further clarified in the PER, on the basis that these locations are available and viable for this purpose. It is acknowledged that their 'availability' would be sporadic depending on their use for educational and community purposes (and that discussions have been



Government of South Australia  
Department for Education

CRICOS Provider No: 00018A

held with their operators/owners as to their current use). None of these locations should be used for 'preplanned' landings."

The Governing Council strongly believe that the school should not be available for this purpose during daylight hours, as it is being used during this time for educational purposes.

While there are procedures in place for helipad, there does not appear to be a process to handle emergencies away from this location, increasing the risk to people located at the emergency laydown areas identified.

Due to the ongoing possibility of the school being used as an emergency laydown area, it is likely to negatively impact on student learning and disrupt activities held at the school and neighboring properties.

While acknowledging that it is proposed to limit operations to no more than 10 calendar days per year, the Governing Council requests that flight paths avoid the school area due to the concerns listed above, along with those relating to noise pollution, the lack of shielding effects available and most importantly the risks to students, staff, visitors and school property.

The Governing Council also objects to using Marryatville High School as an emergency laydown site, as less populated areas would be more appropriate to use should the need arise.

Regardless of the final locations selected, significant payments should be made to affected land holders to reinstate the area from any damage incurred and to compensate for any inconvenience.

In closing, we would like to reiterate that the most important risk issue for the Governing Council is the health and safety of students and staff, and that the school community expects the Governing Council to take a zero tolerance approach to risk in this regard.

The Governing Council thank you for the opportunity to provide a submission to the proposal and hope that there is no need for any emergency laydowns in the future.

Should any further information be required, do not hesitate to contact me through the details provided above.

[Redacted signature block]

12 March 2020

Minister for Planning  
[REDACTED]

Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5001

Dear Sir,

**PEREGRINE MIXED USE MAJOR DEVELOPMENT  
VARIATION 2 HELICOPTER LANDING FACILITY  
Submission to Public Environment Report for Variation 2 (PER)**

I write to convey my objection to the above Major Development. My main objections relate to –

- Potential impact on heritage buildings;
- Impact of noise in a residential and commercial area;
- Risk posed to a residential locality by helicopter flights and landings;
- Potential reduction in property values and development restrictions; and
- Heritage impact

**Potential impact on heritage buildings**

As an active member of Clayton Wesley Uniting Church I am extremely concerned about the impact of rotor blade downwash and rotor wake on the heritage buildings of my church and other nearby heritage buildings. Clayton Wesley Church buildings were constructed in the 19<sup>th</sup> century of sandstone on bluestone footings and have no form of reinforcement to withstand vibrations associated with helicopter landings and takeoffs.

While there is some analysis provided with respect to 'normal' landings and takeoffs, no information is included in the report of additional vibrations or air disturbances that would be generated should a pilot need to correct a problem once flying or during an emergency landing.

**Noise Impact**

The noise impact as given in the PER and at the information sessions is inadequate and unconvincing. The readings presented were of levels recorded in two nearby streets. The readings showed 4 or 5 very sharp spikes in a 24 hour period, corresponding to a car door slamming or a motor cycle backfiring. No adequate comment was made about the extended times the high level of noises emitted by helicopters during flight, landing and/or takeoff that local residents and businesses would have to endure.

The applicant has stated that "Helicopter activity will operate on no more than 10 days per year and only during daylight hours." The frequency or limit to the number of flights on those 10 days is not addressed.

It is not beyond the realm of possibility of economic consideration and viability, f Peregrine selling helicopter flights from their site to The Bend Motorsport Park in the future. This would result in significant aviation traffic and consequently increased noise levels.

The applicant has states operations only during daylight hours but then state “until 10 pm”. I have yet to see 10 pm occur during daylight hours here in South Australia.

### **Risk of accidents**

At the Norwood public session it was claimed that the risk of accidents (or ‘incidents’ as they were called), would be low for individual flights. No assessment has been provided as to how ‘incident’ risk increases as the number of flights in a day rise.

Common sense indicates that an increased number of flights on any given day will result in an increased number of ‘incidents’ and increased risk to people and property in the vicinity. Given all the interactions involved, the increase in risk is likely to be exponential rather than linear.

The increased risk of serious impact within a residential and commercial area is not tolerable. How many other cities in Australia or overseas, London, New York for example, permit helicopter landings on privately owned buildings within a residential area?

### **Potential reduction in property values and development restrictions**

I am very concerned about the potential reduction in the value of my family’s property located within 150 metres of the Peregrine development and directly under the proposed flight path.

I am concerned that the opportunity to develop the property in the future, and potentially take advantage of the Government’s preference for higher density living in close proximity to the city would be hindered or constrained by the fact a flight path exists above it.

### **Heritage impact**

The PER at 6.0 Heritage Impact Assessment states “These comparisons show that the proposed changes are not visible from the primary setting of the Clayton Wesley Church (when viewed from The Parade).” It is not the view **from** the church that is relevant but rather the view of both buildings from The Parade which is relevant. Clearly, the further away the viewer is, the greater will be the impact of the proposed helipad. The PER also mentions that the landing facility on top of the offices will be partially visible when looking north or south along Portrush Road. It concludes that the proposed variation will ‘have no consequential impacts’ on Heritage buildings.

The evidence and the discussion of how the development *per se* will visually affect Heritage buildings are very superficial. A building of this bulk and height will dramatically affect the familiar landscape at this intersection, which since the 1880s has been defined by three buildings and the spires of the two churches. It is non-sensical to state that the impact, plus or minus the helicopter landing facility, will ‘have no consequence’. The large building will draw people’s eyes and the contrasting addition on top will make it stand out even more.

**Conclusion**

I recognise that helicopters are a part of modern day life, and I often hear of helicopters providing essential services to the entire community, such as transporting critically injured patients to hospital, or police protecting the whole community. These are public services, where the benefits accrue to the community as a whole. The proposed application is for an exclusive helipad where all benefits amass to an exclusive group but inconvenience and degrade the quality of life of all residents and business operators in the community, Shahin associated entities excepted.

In conclusion, this development is unacceptable for this area. I strongly object and urge the development be rejected. There are no modifying conditions that the applicant could make to resolve my concerns.

In light of there being no redeeming features or elements that present a compelling public interest or benefit for this development, I reiterate that it should be **REJECTED**.

Yours faithfully

[Redacted signature]

[Redacted name]

[Redacted address line 1]

[Redacted address line 2]

NORWOOD SA 5067

PS I do not wish to speak to my representation at the SCAP hearing.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 1:44 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Stop Peregrine's Helipad

Hello,

As a long term owner and resident of Norwood I have grave concerns for the proposed helipad as part of the Peregrine development.

Ludicrous wouldn't be a strong enough word to describe the proposal, a flight of fancy if you will, for a rich man and his big boy toy. Completely unnecessary to bring a helicopter multiple times every day into a high density residential area with very close proximity to 3 schools!

Adelaide is not a large city, our (purpose-built for aviation) airport is 15 minutes drive across the other side of the cbd - ludicrous...seriously.

I don't believe you would find any NPSP resident outside of the Peregrine building who would be happy with this proposal being even considered. Listen, consider and respect your constituents and DO NOT allow this helipad proposal to be allowed to pass.

Yours sincerely,

Concerned resident.  
Sent from my iPad

Minister for Planning,  
████████████████████  
Department of Planning, Transport & Infrastructure,  
GPO Box 1815,  
Adelaide, 5001.

The Secretary,  
Kensington Residents' Association Inc.,  
████████████████████  
████████████████████,  
Kensington, 5068.  
13<sup>th</sup> March 2020.

**Re: Peregrine Mixed Use Major Development Variation 2 – 270 The Parade, Kensington**

Dear Sir,

Our Association has represented the interests and concerns of Kensington residents since 1977. During this time we have been involved in many planning matters of serious concern to our residents.

In response to Peregrine's original development application in 2016 there was a very large level of concern expressed by local residents emphatically opposed to the multi-storey construction. More residents became involved in opposing that application than at any time in our Association's history. We now find an even greater level of concern from residents with the proposal to install helicopter landing facilities on the roof of the approved building.

In addition, there has been a similar level of concern from parents of students at the many schools in and near Kensington whether Kensington residents or not and from residents of Beulah Park, Eastern areas of Norwood and beyond, who feel that they will be impacted either by noise disturbance, possible danger from accidents or the designation of nearby open spaces, that are mostly school ovals, as emergency landing sites.

Our Association opposes the establishment of helicopter landing facilities on the proposed Peregrine building for the following reasons:

- Noise disturbance
- Safety issues including proposed use of local open spaces including school grounds as emergency landing sites
- Potential damage to nearby State Heritage buildings
- Potential loss in value for nearby residential properties
- No expected positive economic or employment impact on Kensington and neighbouring areas.

#### **Noise Disturbance**

Use of the proposed helipad will have an adverse impact, because of unacceptable noise levels, on nearby residents and those directly under the flight paths from approaching, landing and departing helicopters. Residents are well aware of the excessive noise level and disturbance when emergency service helicopters fly over or hover over the area. This is considered an essential service whereas the proposal is for helicopters to transport "important" business visitors between Kensington and Tailm Bend, hardly an essential service.

The report by Sonus Acoustic Engineers is deficient and misleading regarding the reported peaks in background noise measured in Bowen Street. The report suggests that the noise from helicopters will be no greater than that generated by a car driving down Bowen Street. This suggestion has been debunked by the Norwood Payneham & St Peters Council report. Quite clearly a totally independent investigation and report is required into the effect of noise levels on the surrounding areas.

### **Safety Issues & Emergency Landing Sites**

A major issue of concern to nearby residents is that of safety. Quite understandably, helicopters have the reputation of having significantly more accidents than fixed wing aircraft. During the public information sessions held at the Norwood Concert Hall on 18th February, the author of the Aviation Specialist Advice report, Mr Colin Weir, acknowledged that the majority of helicopter accidents occur at take-off or landing.

However, nowhere in the report is there any overall evaluation of the risks associated with the proposed helicopter landing facility. Rather, the report documents the various risk management responses which are proposed, such as the design of the landing pad, emergency response plans, and alternative landing facility options etc.

There is clearly an inherent risk of an incident, including a crash, occurring in proximity to the proposed helipad. The consequences of such an incident would be catastrophic, given the significantly built-up surrounding residential area and the high volume of traffic along The Parade and Portrush Road through this intersection.

The emergency landing sites nominated by the applicant are totally unacceptable. Most are school ovals, posing an unacceptable risk to students in the event of an emergency. In an emergency, will the pilot fly to the nearest school oval only to find it occupied by hundreds of children and then be forced to fly to the next nearest site and repeat this process until a vacant oval is located? The applicant and safety expert appeared to be unaware that the Marryatville Primary School oval is traversed by 66,000 volt power lines, hardly suitable for an emergency landing. In an emergency, helicopters usually lose forward motion and just fall out of the sky!

The public safety risks are totally unacceptable and have not been adequately addressed in any of the documentation provided by the applicant or the Department of Planning, Transport and Infrastructure. A totally independent safety assessment is required.

### **Potential Damage to State Heritage Buildings**

The Heritage Impact Assessment concentrates on the visual effects of the changes to the building design to accommodate the helipads. More importantly, it completely ignores the possibility of damage to the neighbouring State Heritage Buildings from vibration caused by "rotor wake".

There was a little mention of the risk of damage from vibration in the Acoustic Engineers report but it was dismissed without being adequately addressed. Once again there is need for an independent review of all matters related to vibrations and the possibility of significant damage to the State Heritage Buildings on the other three corners and in particular the spire, roof and stained glass windows of Clayton Church.

### **Property Devaluation**

There is a very real risk that the effect of helicopter flights and in particular the noise disturbance and concerns about safety will devalue residential properties under and near the flight paths. This matter has not been addressed.

**Economic or Employment Impact.**

Peregrine claims: *“Located on the roof of the new building, the helipad is an important component for Peregrine to service its business needs. The need for quick, accessible transport is paramount to ensuring a pleasurable experience for overseas and interstate business guests.”*

However In *Appendix K – Evaluation of Economic & Employment Impacts Prepared by Fyfe* it states:

*“In our opinion, due to the limited and integrated use of the proposed landing facility, it will generate no further economic contribution or impact on the Norwood and Kensington Precincts, as compared to the approved development. The integrated nature of the facility on the roof of the approved building reinforces that no significant local or broader job creation will result from the construction of the helicopter landing facility itself.”*

Clearly the proposed helipad will have no positive economic or employment impact on Kensington and other neighbouring areas.

**Conclusion**

Our Association supports the submission from the City of Norwood Payneham & St Peters that opposes the approval of the proposed helicopter landing facilities on the Peregrine building.

The shortfalls in the Public Environment Report on matters such as noise, safety, possible damage to heritage buildings and failure to consider the likely devaluation of affected properties highlight the need for a completely independent investigation into these matters.

In conclusion our Association urges you to consider the amenity and safety of the many residents who live under or near the flight paths and the safety of students at the many schools in the area by refusing approval of the application.

Yours faithfully,

[Redacted signature]

[Redacted signature]

[Redacted text]

[Redacted text]

[Redacted text]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Proposed Development Peregrine Corporation Portrush Road  
**Date:** Friday, 13 March 2020 2:00:52 PM

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Dear Sir/Madam,

I am writing to express my objection to the proposed development by Peregrine Corporation on the corner of Portrush Road and The Parade, Norwood. In particular, the inclusion of a helipad at this site for the benefit of a private operator is a particular sticking point. This is not in keeping with the heritage of the area, would create considerable sound pollution to neighboring residences and may even raise safety concerns that so far have not been addressed. It also begs the question if this is approved for one corporation will this hasten further similar development which does not appear to be in the interests of the local community of Norwood and the Adelaide suburbs?

I was married in the Clayton-Wesley Church which faces this proposed eye-sore. This church is a wonderful representation of the area's heritage. You couldn't conceive of two more differing architectural styles between these buildings.

I respect the autonomy of private operators to build on their land what they deem suitable. But this always has to be considered in a local context and any impact upon neighboring structures and people to be considered in full.

Yours sincerely,

[REDACTED]  
Clarence Park

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 2:29 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine development proposal - opposition to helipad

Dear Major Developments SA

I hope this email finds you well and that you have thoroughly reviewed the feedback contained within the public meeting report: [https://www.saplanningportal.sa.gov.au/updates/news\\_item?a=625742](https://www.saplanningportal.sa.gov.au/updates/news_item?a=625742)

I completely concur with the views expressed in this summary report but would like to add some personal points to formally register my objection to this proposal.

I am a property owner ([REDACTED] Kensington) and purchased this property in 2010 because I fell in love with the character and culture of the dwelling, suburb and community. Purchasing in a historic conservation zone was very important to me. My plan was to return this dwelling to its former glory, and to make this a forever (and hopefully family) home.

I am currently halfway through renovating this property (solid brick extension), and am paying particular attention to conducting this renovation in a manner that is sympathetic to the heritage of the house and the suburb. Once finished, this will make a beautiful home.

However, I am now faced with the possibility of a helipad being located within one block of my forever and family home; had I wanted to live and raise a family next door to an aerodrome, I would have purchased at West Beach or Parafield.

Therefore, I am appalled that a proposal that is completely incongruent with the cultural and historic landscape of the area is being entertained at all - and that it has proceeded this far. The addition of the helipad proposal as a variation to the original development approval (rather than in its own right) also appears to be a creative circumvention (abuse) of the spirit of proper process.

Of particular concern, are the multiple safety risks posed by the helipad - and the unsatisfactory way in which the 'safety case' has been developed. This includes the complete inappropriateness of using school grounds as emergency landing sites, and the lack of thorough engagement and seeking of formal approval from proprietors of these sites. On the basis of this, I don't place much faith in the applicant's commitment to safety.

Based on the manner in which this application has been lodged and managed, I am also distrustful of the applicant's wider intentions - why build a purpose-designed helipad for use on only 10 calendar days per year (less than 3 per cent of the time)? As a business proposal, this does not make much sense, unless the longer term plan is to expand its use. Irrespective of this, the safety concerns posed (even at a 3% usage rate) should nix this proposal cold.

I urge Major Developments SA to listen to the needs of the Council and the local residents and reject this proposal. The wants of one organisation, one individual should not come at the expense of the safety and well-being of the wider Kensington and Norwood community.

Best wishes



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name ..... Address .....  
Telephone ..... Email .....

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other ..... *Mayor of the City of Burnside* .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

*As Mayor and resident of Burnside, I am concerned about the use of a commercial building being used as a Landing/Take off pad for the use by a business. Airports provide these facilities and should be used rather than a busy, built up residential area with already major concerns regarding traffic and noise and air pollution.*





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Two landing pads should not be allowed to be built on top of the 7<sup>th</sup> storey building. Accidents do happen and the risks are too great. These are for commercial purposes, rather than for emergency services. Generally, I believe residents of Burnside are opposed to this development and the Council voted unanimously to oppose the same.

Other general comments:

Residents from Norwood, Payneham + St Peters Council area as well as those in Burnside on the take off area adjacent (Beulah Pk) and across the flight path to Tailum Bend. The hours from 7am to 10 pm are NOT all daylight hours. Two landing pads and 10 days a year may be the start of further future growth and impact.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



Government of South Australia  
Department of Planning,  
Transport and Infrastructure

## Submission re Peregrine Mixed Use Major Development Variation 2 Helicopter Landing Facility

[REDACTED]

I am a resident of Kensington who does not want a helicopter landing facility in the suburb.

The community puts up with noise from ambulance and police helicopters which are necessary for the maintenance of public health and safety, but the use of this proposed helipad is unnecessary and purely for the benefit of a private company and its visitors with no community benefits. Residents know from experience that noise from emergency helicopters is noticeably louder than that of traffic on Portrush Road so the helipad would definitely adversely impact the amenity of the area.

It is noted that there are many references by Peregrine to the fact that the *Fly Neighbourly Guide* has no legal standing and is therefore not relevant. It does not follow that neighbours are to be completely ignored or that anyone with enough money can or should impose their conditions on others. The corporation comments that noise tests are more stringent than those for airports. So they should be, because Kensington and Norwood are not airports where aircraft noise is to be expected. They are residential and business areas whose residents, traders and clients should not have the amenity of the area adversely affected by a private business for private gain.

As there is no real need for the helipad, then this additional danger in a closely built-up residential, business and heritage area is unwarranted. Despite the number of possible landing places nearby in the event of an emergency, their use could be severely limited by the unregulated activities continually occurring at those places. A pre-emptive landing to avoid the possibility of a crash may fit onto the chosen landing place, but a crash landing could endanger a much larger area than the green space, even if it were unoccupied.

The only reasons for having a helipad given by The Peregrine Corporation is that "the need for quick, accessible transport is paramount to ensuring a pleasurable experience for overseas and interstate business guests" and that "each visitation will be crucial in securing more business". In regard to the first claim, the efficiency of helicopter transport via the helipad compared to flying visitors, who most probably arrive via an airport, directly to Tailem Bend or taking the very easy drive from Adelaide airport to Kensington is debateable. As regards the second claim, it is unlikely that every visit will improve business, and anyway - business for whom? It would not improve business for the residents of the area or of South Australia.

While this company contributes to the economy of South Australia, it is debateable if the net results of providing junk food and cigarettes and undermining the growth of small businesses constitutes a real benefit. Small businesses achieve much more than large businesses to improve South Australia's economy and do not use their money to chip away at people's rights to have a say in their own neighbourhood.

Yours sincerely,

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 2:44 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine's Helipad

Dear Minister for Planning,

I am not opposed to the Peregrine Corporation Helicopter Landing Facility. However, the "Public Environment Report" indicates that

1. There is no aviation legislative requirement for an aviation operation of this type and as a result the *Flight Safety* "Aviation Specialist Advice Report" only provides "Management processes"; and
2. There is no formal policy or guideline for helicopter noise in South Australia and as a result the *Sonus* "Helicopter Noise Assessment" only provides "reasonable and practicable measures to minimise noise".

Based on the above, I am concerned that given the absence of any formal legislation, policy or guideline for helicopters in South Australia that the development for the Helicopter Landing Facility has not been adequately considered.

I request that before this development is approved that further investigations be made to show that the proposal for the Helicopter Landing Facility is shown to be acceptable when compared against objective criteria (such as legislation, policy, guidelines, etc that apply in other jurisdictions) that have gone through an appropriate and extensive consultation process and have actually been implemented in practice.

Thank you,

[REDACTED]

[REDACTED]

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**From:**

**Sent:**

[REDACTED]  
Friday, 13 March 2020 2:44 PM

**To:**

DPTI:State Commission Assessment Panel

**Subject:**

I oppose the helicopter pad application and want my opposition noted.'

**I oppose the helicopter pad application and want my opposition noted.'**

[REDACTED]

[REDACTED]

Minister for Planning,  
██████████n,  
Department of Planning, Transport & Infrastructure,  
GPO Box 1815,  
Adelaide, 5001.

██████████  
██████████  
Kensington, 5068.  
13<sup>th</sup> March 2020.

**Re: Peregrine Mixed Use Major Development Variation 2 – 270 The Parade, Kensington**

Dear Sir,

As a resident of Kensington since 1974, I have serious concerns with the proposal to include helicopter landing facilities on the proposed Peregrine multi-storey building at 270 The Parade, Kensington.

There was a huge groundswell of opposition to the original application for construction of their monstrosity in Kensington and disgust that it was approved despite the site being legally zoned for a maximum of two storeys. The applicant showed its contempt for local residents at that time and has now added insult to injury by proposing the installation of helipads on the roof. The applicant's regard for the local community is illustrated by its failure to get the address of the site correct. Throughout the documentation the suburb is mistakenly given as Kensington Park!

There is now an even greater level of community concern from residents and parents of children that attend our local schools with the proposal to install helicopter landing facilities on the roof of the approved building.

I am opposed to the establishment of helicopter landing facilities on the proposed Peregrine building for the following reasons:

- Residents will be subject to unacceptable noise levels for the benefit of a few "important" business visitors. The report by Sonus Acoustic Engineers is deficient and misleading. A completely independent investigation and report is required into the effect of noise levels in surrounding areas.
- Use of the rooftop as a helicopter landing facility poses unacceptable risks to nearby residents and road users. Helicopters have a poor safety record in comparison to other aircraft. At the 18<sup>th</sup> February public information session the author of the Aviation Specialist Advice report, Mr Colin Weir, acknowledged that the majority of helicopter accidents occur at take-off or landing.
- The risks of danger to local residents and school children are multiplied by the nomination of emergency landing sites on school ovals and open spaces throughout Kensington and nearby areas. One such site is the Marrayville Primary School oval that has 66,000 volt power lines overhead!
- The report fails to provide an overall evaluation of the risks associated with the proposed helicopter landing facility. An independent safety assessment is required.
- The Heritage Impact Assessment ignores the possibility of damage to the neighbouring State Heritage Buildings and in particular the spire, roof and stained glass windows of Clayton Church from vibration caused by "rotor wake".
- The Public Environment Report ignores one likely impact of multiple helicopter flights over the areas surrounding Peregrine site. The unacceptable noise disturbance and concerns about safety under and near the flight paths are likely to result in the devaluation of residential properties in a wide area.

- Peregrine has claimed: *“the helipad is an important component for Peregrine to service its business needs. The need for quick, accessible transport is paramount to ensuring a pleasurable experience for overseas and interstate business guests.”*

However In Appendix K – Evaluation of Economic & employment Impacts Prepared by Fyfe it states: *“In our opinion, due to the limited and integrated use of the proposed landing facility, it will generate no further economic contribution or impact on the Norwood and Kensington Precincts, as compared to the approved development. The integrated nature of the facility on the roof of the approved building reinforces that no significant local or broader job creation will result from the construction of the helicopter landing facility itself.”*

Peregrine is in the business of wholesaling and retailing cigarettes, the sale of many fast food (junk food) lines through its various businesses and fuel. How does the use of helicopters to transport important guests to Tailem Bend benefit these activities? It could also be said that apart from the sale of fuel all the other business activities do nothing for society, either socially or economically, as they result in cancer and obesity.

Clearly the proposed helipad will have no positive economic or employment impact on Kensington and other neighbouring areas. It is an indulgent and ostentatious display of wealth and shows their absolute disregard for the very genuine fears and concerns of residents.

I note and support the submission from the City of Norwood Payneham & St Peters that opposes the approval of the proposed helicopter landing facilities on the Peregrine building.

In conclusion I urge you to consider the amenity and safety of the many residents who live under or near the flight paths and the safety of students at the many schools in the area by refusing approval of the application.

Yours faithfully,

[Redacted signature block]

■ [Redacted text block]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 2:47 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** submission re Peregrine Helicopter landing facility

[REDACTED]  
Minister for Planning  
[REDACTED] Unit Manager Policy and Strategic Assessment  
Planning & Land Use Services  
Department of Planning, Transport and Infrastructure  
[REDACTED]

Dear Sir,

Please accept this email as my submission on the proposal by Peregrine Corporation for a helicopter landing facility on the roof of a new seven storey mixed use building at the intersection of The Parade and Portrush Road at Kensington.

Even though I don't live near the proposed development I think every South Australian has an interest in this proposal because of the dangerous precedent it would set if a helipad was approved for use by a private corporation in a residential area.

I submit that the contention by the applicant that they can't assess the impact of noise against the *Environmental Protection (Noise) Policy 2007* because it specifically excludes aircraft noise should be rejected. I submit that the policy is referring to noise by ordinary aircraft flights to and from established airports. The situation with the Peregrine helipad is entirely different and it is essential that the proposal undergo the strictest assessment of noise impacts given its location in a residential area.

The PER advises that three types of helicopter are proposed to be used; Bell 206 Jet Ranger, Eurocopter EC 130 and Agusta Westland AW109/H109. The only one of these used in the Sonus Noise Assessment is the Bell 206 Jetranger. A Eurocopter AS350B2 was assessed instead of a Eurocopter EC 130, and the Agusta Westland AW109/H109 was not assessed at all (refer table on page 9 of Appendix E Sonus Report). I submit that the noise assessment is therefore incomplete and inadequate. Given the unprecedented circumstances of Peregrine's proposal and the high risk of severe noise disturbance to surrounding residences, schools and aged care facilities, the noise assessment must be absolutely thorough and flawless. No decision should be made on the proposal until the noise impacts have been determined with 100% certainty.

I submit that the community's safety fears about schools being used as emergency landing sites should be considered above all else. On that point alone the proposal should fail.

With changes in planning laws allowing higher buildings in suburbs, the Peregrine proposal would set a highly undesirable precedent for helipads to become standard features of suburban town centres, retail complexes etc. That is definitely not the type of urban environment that people want to call home. The extreme noise disturbance and loss of amenity would drive an exodus of population – something that the South Australian Government does not want and cannot afford.

The proposal should be refused.

Yours sincerely,



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

## TELL US WHAT YOU THINK

*Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.*

Name ..... Address .....  
Telephone ..... Email .....

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other Provider of residential aged care services for older persons .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

Yes.

Clayton Church Homes (CCH) has operated and provided residential aged care services since 1968 and is aligned with Clayton Wesley Uniting Church located on the corner of Portrush Road and The Parade. CCH operates three retirement villages and provides home care services in the Norwood area with most residents being long standing members of the community or attracted to Norwood by the range of services provided by CCH and the peaceful lifestyle offered by Norwood.

This proposed helicopter landing facility is directly opposite the Church and within 300 metres of the first of the three retirement villages.

Older residents living in our facilities are often coping with chronic and life threatening illnesses where every effort is continually made to mitigate any activity that aggravates their current health and level of anxiety.

Installation of a helipad in this area will undoubtedly impact on our insurance costs and potentially effect future occupancy of our facilities as it will be more difficult to attract residents in to an area with this high level of disruption.



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

## What could be done to address your concerns?

Do not support the installation of the helicopter landing facility in a residential area directly adjacent aged care and church facilities.

## Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
[REDACTED],  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[REDACTED]



Government of South Australia  
Department of Planning,  
Transport and Infrastructure

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 3:40 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine Mixed Use Major Development Variation 2

Minister for Planning

[REDACTED]  
Department of Planning, Transport & Infrastructure  
GPO Box 1815, Adelaide 5000

Re: Peregrine Mixed Use Major Development Variation 2 - 270 The Parade, Kensington

"Vary the development authorisation to permit a Helicopter Landing Facility on the roof of the approved building"

The use of the helicopter landing facility is limited to business purposes associated with the headquarters facility for no more than 10 days per year during daylight hours.

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To the Minister for Planning,

I'm writing to you in response to *Public Environmental Report (PER) for Variation 2 to the Peregrine Mixed Use Major Development* the document made available for the current stage of public consultation on the Helipad proposed for 270 The Parade (Kensington) by Peregrine Corporation.

Within the lengthy document Peregrine Corporation have identified the rationale for the helipad is due to:

- "The need for **quick, accessible transport is paramount to ensuring a pleasurable experience** for overseas and interstate business guests."
- "Helicopters will **transport interstate and overseas guests to key Peregrine sites of state importance** including the Peregrine headquarters and the Tailem Bend Motorsport Park Complex."
- "The flow on effect of this service is **expected to be beneficial to the South Australian economy.**"

I would like to outline my scepticism at the purpose for this variation being that of quick accessible transport for interstate and overseas guests to key Peregrine sites, particularly:

-Taillem Bend Motorsport Park Complex:

Interstate/overseas quest will be arriving through the Adelaide airport where there are existing Helipad facilities for transport to Taillem Bend → This is quicker than travelling to Kensington first for a helicopter

-Peregrine Head Quarters (the proposed site)

Metropolitan traffic in Adelaide is famously easy when compared with traffic in the Eastern seaboard capital cities. Hence “the 20 minute city” label

*“The proposed helicopter landing facility is an **integral component** of the overall redevelopment of the headquarters site and will greatly assist Peregrine Corporation in the efficient conduct of its business operations.”*

This statement seems dubious, it seems unrealistic that such an “integral component of the overall redevelopment” was accidentally omitted in the original proposal.

In evaluating the proposal it is important to consider the likely and realistic benefits against the potential risks. I understand part of the purpose of the PER is to identify and address economic, social and environmental benefits - I will attempt to address each of these areas in my response.

### Economic Benefits

The Evaluation of Economic & Employment impacts prepared by FYFE state:

- “In our opinion, due to the limited and integrated use of the proposed landing facility, **it will generate no further economic contribution or impact on the Norwood and Kensington Precincts**, as compared to the approved development.”

- “**no significant** local or broader **job creation** will result from the construction of the helicopter landing facility itself”

FYFE only go as far as to say it will “complement the overall redevelopment” of the Peregrine Corporation Headquarters, but do not identify any prediction of associated economic benefits specifically arising from the addition of a helipad.

In terms of economic benefit, and given the helicopter landing facility will be limited to no more than 10 days per year during daylight hours, it is challenging to see how this addition would provide a significant financial benefit to the state.

I do not believe the applicants have provided evidence that this variation will provide any significant additional economic benefit beyond those of the development that has already been approved for the site.

### Environmental Benefits

**The application acknowledges** environmental impacts are likely to be noise and air emissions associated with the helicopter movements to and from the site.

There is no specific address of how these impacts will affect the health of the age care residents in the nursing home across the street. Nor is there discussion of health and learning impacts to the students at the four educational facilities located within Kensington.

There is no discussion of cumulative pollution (from helicopter exhaust) in the open air public swimming pool located in proximity to the development site.

## Social Benefits

The only mention of social effects in the PER is one line “the proposal is not considered to have any extraordinary social effects”, but there is no further discussion or evidence of investigation to validate this statement. There is an absence of any mention of social benefits.

As a local Kensington resident I can say that the initial proposal generated unrest within the local community, the new proposal for the helipad validates the local resident perception that Peregrine have little regard for our local community. This perception is reinforced by the limited scope of reference within the PER in that evaluation of noise and traffic impacts – the report document focuses only on the immediate neighbours.

I do not believe the applicants have provided evidence that this variation will provide any social benefits. Nor is there any comment on environmental benefits.

There are however key outstanding questions.

### **1) What is the maximum permitted Frequency of Flights?**

The true impact of the “The use of the helicopter landing facility is limited to business purposes associated with the headquarters facility for no more than 10 days per year during daylight hours” is far from resolved in the applicants document, see the following extracts from the document:

→ The Helipad Air Quality Impact Assessment makes the following assumptions for their calculations:

-Assume there is a continuous discharge from the helipad for all hours 7am to 10pm

-Assume the discharge rate is continuously at the average hourly rate calculated with 3 helicopters using the helipad per hour

If daylight were to end at 9pm, can we assume 42 flights per day (14hrs @ 3/hour)?

→ Appendix K (page 2) “10 helicopter movements are anticipated per year”

→ On 1 Oct 2019 in correspondence to Sally Smith (Executive Director for Planning & Land Use Services) the Senior Project Manager at Peregrine Corporation states:

“Peregrine Corporation cannot **commit** to how many landings / take-offs may occur on each of those (maximum) 10 days of use per year”

This is a key question that needs to be conclusively answered for this application to be considered. Furthermore all of the consultation engaged should be re-assessed against the same clearly defined flight frequency.

### **2) What is the Actual Noise impact?**

**Note: The Kensington Policy Area 6.7 states** “Development should be designed, sited and constructed to: (a) limit to a reasonable level, noise and air pollution beyond its site”

Sonus report comment: “The figure shows that the predicted maximum levels are regularly exceeded in the existing noise environment.”

I believe this statement has potential is a misleading readers when combined with the figure 5.2 Maximum noise levels recorded in Bowen Street (27 July 3 August 2016), as it does not *compare apples with apples*.

The existing noise environment peaks can be easily attributed to individual trucks on Portrush Road driving pass the site, however a helicopter will have a sustained presence during the approach, landing and departure period. I believe a more appropriate comparison is the *Leq* measurements (the constant noise level that would result in the same total energy being produced over a given period) provided in the report which are significantly an consistently below the 87dB(A) predicted for the helicopters.

The report says “The following measures will be taken to moderate the noise to occupants of the development” but NOT the noise to surround land users.

Additionally the report only refers to the immediate building proximity (and internal acoustic measures), not the surrounding community in the flight path such as the four education facilities located in Kensington and the place of worship directly opposite the development site.

In the 1 Oct 2019 response from the project management, they side-stepped this issue raised by Sally Smith (Ex. Dir. Planning & Land Use Service):

*“Helicopter noise should not be compared to traffic noise. Noise from elevated sources propaqate noise over a much wider area than ground level noise sources and protection against its intensity or character is not typically a feature of noise sensitive receivers due to its unusual nature. Helicopter noise may affect a wider level of noise sensitive receivers at ground level because such noise cannot be controlled by ground-level barriers.”*

### **3) Aviation safety concerns?**

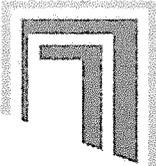
The documents identify that “*the operation of the Helicopter Landing Facility and associated safety risks should be investigated, with a particular focus on emergency planning and response” and that “a fully developed site-specific Emergency Response Plan will be developed” - this is a document that should require extensive public consultation and debate prior to the variation being considered for approval.*

In *Appendix D - Aviation Specialist Advice Report Prepared by Flight Safety* identifies available open areas that could be used as emergency Laydown areas on a Google Map. Six of the seven sites are school grounds. One site identified (The Marryatville primary school oval) has a high voltage overhead line passing through the middle of the oval making it a questionable location for an emergency landing.

In conclusion, with ambiguous information having been presented, and so many questions outstanding: I do not believe the multitude of unknown and potential risks for the broader Kensington (and NPSP) community that may result from this addition can be justified simply so a privileged few can have a “pleasurable experience” - particularly as there is no actual prediction of direct economic benefits specifically forecast with the addition of a helipad to the proposal.

Sincerely





# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name ..... [REDACTED] Address ..... [REDACTED]  
Telephone ..... [REDACTED] Email ..... [REDACTED]

What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

What is your overall position on the proposed development?

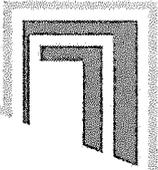
- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

NO BENEFIT to the community, or state.  
NO NEED, ONLY AN OPPOUNENT, UNNECESSARY REQUEST  
By THE BUSINESS  
Possible RISK to the community should AN ISSUE  
HAPPEN TO THE HELICOPTER.  
ADELADDE IS NOT A city which HAS TRAFFIC ISSUES  
THAT WOULD WARRANT A HELICOPTER FOR A BUSINESS



Government of South Australia  
Department of Planning,  
Transport and Infrastructure



# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

DO NOT APPROVE THE REQUEST

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000



Government of South Australia

Department of Planning,  
Transport and Infrastructure

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 3:43 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Peregrine Corporation Helicopter Landing Facility – Public Environment Report - Submission

## **Peregrine Corporation Helicopter Landing Facility – Public Environment Report - Submission**

I write to oppose the variation made under Section 46 (4) of the Development Act 1993 to the approved redevelopment of Peregrine Headquarters, specifically in relation to the inclusion of a helipad into the development design.

As a co-owner of an apartment in the Nuova development, located directly opposite from the current Peregrine headquarters, the inclusion of a helipad into the design will have a negative impact on the property aesthetic and rental value.

The apartment is located on the top floor and faces east. It will be directly impacted by the noise pollution caused by aircraft activity. This will severely impact the attractiveness of the property as a rental, which would otherwise be sought after due to its location and access to local amenities. There is uncertainty whether the current tenant will want to remain in the property long term as a result of the proposed aircraft activity.

Although approval is sought for 10 days of flight activity a year, there is no limit on the number of flights that can be conducted on any of those days. This is a concern. The noise levels, which are significant, will be intolerable for the properties surrounding the development throughout that day.

I have been impacted by this development for the past few years, emotionally and materially, this will only get worse with the approval of this variation. It will have a detrimental impact on property value and the cultural heritage of the immediate area.

There is no precedent to demonstrate that Peregrine Corporation, and the Shahin family, will take these concerns into consideration and be good ‘neighbours’. Throughout this development process the concerns of local residents, business and council have been largely ignored. I feel we have been treated with contempt with no regard for the broader community.

As a major employer, and business, if the same approach were taken to customers then the Shahin family would not enjoy the lifestyle they currently have.

The lack of State Government intervention on behalf of the community is equally disheartening.

I strongly oppose the approval of this variation.  
Regards,

[REDACTED]

Friday 13 March

Minister for Planning - [REDACTED]  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000  
[REDACTED]

***Public Consultation Response to the Major Development Proposal  
Peregrine Mixed Use Major Development –Variation 2 Helicopter Landing Facility***

[REDACTED]

Thank you for the opportunity to provide feedback on the Peregrine Corporation Helicopter Landing Facility at 270 The Parade Norwood.

After reading the details within the Public Environment Report (PER), discussions with numerous community members and leadership within Marrayatville Primary School, the following key issues have been highlighted and as a result I urge State Government NOT to approve the proposal for the Peregrine Corporation Helicopter Landing Facility.

This submission represents my personal opinion and it is important that these concerns are raised by local residents. These views also support the concerns of the City of Norwood Payneham and St Peters Council.

I draw attention to the detail on page 36 of the City of Norwood Payneham and St Peters Council Minutes – Monday 2 March 2020 – [Click Here](#).

## **SAFETY**

### **Vehicle, Pedestrians and Residences**

I have concerns regarding the proposed Helicopter Landing Facility being built adjacent to a residential zone, on the corner of a major traffic corridor for trucks and vehicles and a major pedestrian accessway to nearby amenities.

This area is a major vehicle and pedestrian thoroughfare and operations will distract many pedestrians crossing this major intersection and walking in adjoining neighbourhoods. There are numerous schools in this area and a development of this nature will act as a distraction to many children walking in this area. This will potentially add another level of risk, separate to the aviation risk.

Take-off and landing are acknowledged in the PER - Flight Safety section as the most dangerous time during a flight and this poses increased risk near many schools, houses and a major intersection.  
*“The helipads have a design value of 19.6 m ‘D’ and all three helicopter types have ‘D’ values of 13m. This additional operational safety margin is considered expedient for operations with these three helicopter types and allows additional safety features during the highest risk, take-off and landing phases of flight.”*

Peregrine has advised that the highest number of helicopter trips using the helipad in one day is 8 and the maximum number of days of use within the year will be 10 days. I question how the State

will monitor this limit and highlight the City of Norwood Payneham and St Peters Council concerns below.

The City of Norwood, Payneham and St Peters, *“considers that any authorisation which attempts to limit the use of the helicopter landing facility to ten (10) days per year is problematic and an improper use of a planning condition, as it would seek to limit the use of a facility that is clearly designed for far more intense usage and avoids dealing with the fundamental question of whether the use is appropriate in the first instance.”*

It is also noted in the City of Norwood Payneham and St Peters Council minutes from 2 March 2020 that, *“the Council considers that the public safety risks associated with the development are manifestly unacceptable and have not been adequately addressed in any of the documentation which has been provided by the applicant or the Department of Planning, Transport and Infrastructure”*.

### **Open Spaces for Emergency Landing**

It is noted in the PER that many schools and open spaces within the areas adjacent could be used as emergency laydown areas.

The PER report also notes, *“it is acknowledged that their ‘availability’ would be sporadic depending on their use for educational and community purposes (and that discussions have been held with their operators/owners as to their current use)”*.

As a member of the Marryatville Primary School Council, I understand no engagement with the School leadership on this matter occurred until after the public meetings were held. I would expect meaningful community engagement with a project of this scale and nature.

*The report also notes that, “Fortuitously the proposed Head Office site is strategically situated in an area surrounded by multiple available sites that could be used as emergency laydown areas. As all operations will be conducted during daylight hours only, all these sites become viable options for emergency use. In an emergency landing situation helicopters, unlike fixed wing, only require a small area for an emergency landing”*.

I understand helicopters only require a small area to land, however I question the thoroughness of the PER - Flight Safety section, given the Marryatville Primary School oval has high voltage power cables above it. I would expect an expert report to note such a hazard and this raises other questions about content of the report.

It would also be very unlikely for a helicopter to find these school spaces clear of children given the constant use of these open spaces for learning throughout the day and into the evening with school sports. To suggest these as emergency landing spaces seems at odds with protecting the safety of the community and the high volume and sporadic nature of use will dramatically reduce viable options in emergency situations. The general nature of an emergency means there may be no time to find one of these identified spaces. The pilot will need to land anywhere they can to minimise impact, placing further risk to the adjoining residential zone given the proximity to the take-off/landing site.

## AMENITY

The City of Norwood Payneham and St Peters Council minutes from 2 March 2020 note, *“The Council considers that the proposed helicopter landing facility will have a significant adverse impact on the amenity for residents living in the surrounding residential area, through noise from helicopters using the landing facility”*.

I acknowledge that a helicopter pad is not a non-complying development; however the word helicopter is not mentioned once in the whole NPSP Development Plan and this raises the question as to whether helicopter landing pads have ever been considered as an appropriate development within the area given the close proximity to the Adelaide Airport.

I note the following details of the Development Plan that related directly to the amenity of adjacent residential areas.

### City of Norwood Payneham and St Peters - DEVELOPMENT PLAN BUSINESS ZONE - PRINCIPLES OF DEVELOPMENT CONTROL

Page 238

- 2 Development should be designed, sited and constructed to: (a) **limit to a reasonable level, noise and air pollution beyond its site**; and (b) without limiting the general application of (a) above, conform with the requirements of all the relevant Environment Protection Policies of the Environment Protection Authority.
- 3 Development within the Business Zone should not include land uses which by their operation will adversely affect the **amenity of the adjacent residential zones**.

I note the City of Norwood, Payneham and St Peters Council minutes from 2 March state, *“In the event that the Governor approves the development, the Council advises that it will give consideration to issuing an order to the owner of the land pursuant to Section 69 of the Development Act 1993, to not operate the facility due to a risk to safety arising out of the use of the helicopter landing pad”*.

## SUMMARY

I believe that both the **amenity** and **safety** of the adjacent Residential Historic (Conservation) zone and other adjoining zones will be adversely affected by the proposed Helicopter Landing Facility. This includes effecting vehicles, school children, pedestrians, businesses, residents and properties (both State and Local Heritage). I urge the State NOT to approve this variation.

It would be wonderful for the **community voice** to be heard through this consultation process to highlight how the State’s Planning system can meaningfully respond and address issues relating to safety and amenity in our communities.

Yours sincerely,





# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name ... [REDACTED] Address ... [REDACTED]  
Telephone ... [REDACTED] Email ... [REDACTED]

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other *Resident of Burnside*

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

I am a civil Engineer, a construction project Manager and an Asset manager. I believe that I am well informed about this.

Helicopters crash regularly. The restricted rooftop helipad is more dangerous than an ordinary helipad. This site is located among a dense population of residents and many vehicles on the adjacent busy main roads. A large number of people would be victims of any crash and fire. There is no public benefit to offset the risk of deaths and damage.

A helipad here is dangerous and unnecessary. There is no necessity nor public benefit to having this helipad to offset the enormous public nuisance of loud noise and significant risk of wind damage.

The helipad must not be allowed because of the danger to the public, enormous public nuisance, the absence of any benefit to the community.





# Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Do not have helicopters at this site. The owner can operate a helicopter from Adelaide Airport more safely to satisfy his needs. Danger and nuisance would be less there.

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
[REDACTED]  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[REDACTED]



Government of South Australia  
Department of Planning,  
Transport and Infrastructure

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 4:15 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Opposition to helicopter landing facility in Kensington for private use

[REDACTED] Unit Manager Policy and Strategic Assessment Planning & Land Use  
Services  
Department of Planning, Transport and Infrastructure

[REDACTED],

Please note my objection to the application for a helicopter landing facility to be established on the roof top of the yet to be constructed Peregrine headquarters building at 270 The Parade, Kensington Gardens.

This will provide no benefit financially or culturally to the community and only be an advantage to a limited privileged few for their recreational activities. Adelaide is fortunate to have a city based airport and to have a helicopter landing facility in a residential area purely for private use shows a lack of respect for the community in which they are based.

I urge you to decline this application.

Kind regards,  
[REDACTED]

## ***Re:- Peregrine Mixed Use Major Development Variation 2***

As a resident of the Kensington/Norwood area (in reasonably close proximity to the proposed helipad), I wish to register my strong objections to the proposed helicopter landing pad at the offices of the Peregrine corporation. It seems incomprehensible to me that such a proposal for a residential area is even being made. The reasons for my concern are as follows:-

### **Residential area**

- A helipad does not belong in a residential area for any number of reasons, including:-
  - amenity
  - safety
  - noise
  - air / environmental pollution
  - possible structural impacts on nearby buildings, including heritage properties

### **When and how often it would be used**

- Whilst at this stage it is stated it would be used no more than 10 days annually, once the helipad is built, it is not too difficult to imagine that over time, approval would be given for this to be increased
- There is no doubt that helicopters taking off and landing are noisy; what would be the impact on other events, activities planned by local residents occurring on the same days
- Consideration also needs to be given to the reasonable likelihood of people living nearby who are shift-workers whose sleep would be affected

### **No community benefit / Elitism**

- There appears to be no benefit to the wider local community who, however, will have to bear the negative impacts and repercussions of such a facility
- It seems a rather elitist, indulgent venture which benefits a handful of 'uber'-wealthy individuals at the expense of the majority of regular citizens who live in the area (how many of the owners/ others who would be using the helipad actually reside nearby?)

### **"Opening the door"**

- Once permission is granted for one, then the 'door is opened' for other wealthy people, corporations, etc., to apply for helipads at other locations, within the same council area, and across the greater Adelaide region!
- They would be justified in appealing any rejections of their proposals based on previous approval/approvals
- Where would it end! No city, especially a small one such as Adelaide, needs such a scenario!

### **Other alternatives**

- Adelaide and environs are quick and easy to get around; we are not like other major Australian capital cities such as Sydney or Melbourne
- From Adelaide Airport to Norwood by car is never more than 30 minutes maximum during peak hour (less during non-peak times)
- It seems that to use existing helicopter landing facilities such as at Adelaide Airport would be a preferable alternative given the various reasons stated above

Sincerely,

  
Kensington SA 5068

  
13/03/2020

12 March 2020

Minister for Planning  
[REDACTED]

Unit Manager Policy and Strategic Assessment  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5001

Dear Sir,

**PEREGRINE MIXED USE MAJOR DEVELOPMENT  
VARIATION 2 HELICOPTER LANDING FACILITY  
Submission to Public Environment Report for Variation 2 (PER)**

I write to convey my objection to the above Major Development. My main objections relate to –

- Potential impact on heritage buildings;
- Impact of noise in a residential and commercial area;
- Risk posed to a residential locality by helicopter flights and landings;
- Potential reduction in property values and development restrictions; and
- Heritage impact

**Potential impact on heritage buildings**

As an active member of Clayton Wesley Uniting Church I am extremely concerned about the impact of rotor blade downwash and rotor wake on the heritage buildings of my church and other nearby heritage buildings. Clayton Wesley Church buildings were constructed in the 19<sup>th</sup> century of sandstone on bluestone footings and have no form of reinforcement to withstand vibrations associated with helicopter landings and takeoffs.

While there is some analysis provided with respect to 'normal' landings and takeoffs, no information is included in the report of additional vibrations or air disturbances that would be generated should a pilot need to correct a problem once flying or during an emergency landing.

**Noise Impact**

The noise impact as given in the PER and at the information sessions is inadequate and unconvincing. The readings presented were of levels recorded in two nearby streets. The readings showed 4 or 5 very sharp spikes in a 24 hour period, corresponding to a car door slamming or a motor cycle backfiring. No adequate comment was made about the extended times the high level of noises emitted by helicopters during flight, landing and/or takeoff that local residents and businesses would have to endure.

The applicant has stated that "Helicopter activity will operate on no more than 10 days per year and only during daylight hours." The frequency or limit to the number of flights on those 10 days is not addressed.

It is not beyond the realm of possibility of economic consideration and viability, f Peregrine selling helicopter flights from their site to The Bend Motorsport Park in the future. This would result in significant aviation traffic and consequently increased noise levels.

The applicant has states operations only during daylight hours but then state “until 10 pm”. I have yet to see 10 pm occur during daylight hours here in South Australia.

### **Risk of accidents**

At the Norwood public session it was claimed that the risk of accidents (or ‘incidents’ as they were called), would be low for individual flights. No assessment has been provided as to how ‘incident’ risk increases as the number of flights in a day rise.

Common sense indicates that an increased number of flights on any given day will result in an increased number of ‘incidents’ and increased risk to people and property in the vicinity. Given all the interactions involved, the increase in risk is likely to be exponential rather than linear.

The increased risk of serious impact within a residential and commercial area is not tolerable. How many other cities in Australia or overseas, London, New York for example, permit helicopter landings on privately owned buildings within a residential area?

### **Potential reduction in property values and development restrictions**

I am very concerned about the potential reduction in the value of my family’s property located within 150 metres of the Peregrine development and directly under the proposed flight path.

I am concerned that the opportunity to develop the property in the future, and potentially take advantage of the Government’s preference for higher density living in close proximity to the city would be hindered or constrained by the fact a flight path exists above it.

### **Heritage impact**

The PER at 6.0 Heritage Impact Assessment states “These comparisons show that the proposed changes are not visible from the primary setting of the Clayton Wesley Church (when viewed from The Parade).” It is not the view **from** the church that is relevant but rather the view of both buildings from The Parade which is relevant. Clearly, the further away the viewer is, the greater will be the impact of the proposed helipad. The PER also mentions that the landing facility on top of the offices will be partially visible when looking north or south along Portrush Road. It concludes that the proposed variation will ‘have no consequential impacts’ on Heritage buildings.

The evidence and the discussion of how the development *per se* will visually affect Heritage buildings are very superficial. A building of this bulk and height will dramatically affect the familiar landscape at this intersection, which since the 1880s has been defined by three buildings and the spires of the two churches. It is non-sensical to state that the impact, plus or minus the helicopter landing facility, will ‘have no consequence’. The large building will draw people’s eyes and the contrasting addition on top will make it stand out even more.

**Conclusion**

I recognise that helicopters are a part of modern day life, and I often hear of helicopters providing essential services to the entire community, such as transporting critically injured patients to hospital, or police protecting the whole community. These are public services, where the benefits accrue to the community as a whole. The proposed application is for an exclusive helipad where all benefits amass to an exclusive group but inconvenience and degrade the quality of life of all residents and business operators in the community, Shahin associated entities excepted.

In conclusion, this development is unacceptable for this area. I strongly object and urge the development be rejected. There are no modifying conditions that the applicant could make to resolve my concerns.

In light of there being no redeeming features or elements that present a compelling public interest or benefit for this development, I reiterate that it should be **REJECTED**.

Yours faithfully

[Redacted signature block]

NORWOOD SA 5067

PS I do not wish to speak to my representation at the SCAP hearing.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 9:59 PM  
**To:** DPTI:scapreps  
**Cc:** DPTI:State Commission Assessment Panel  
**Subject:** Representation regarding the Peregrine Mixed Use Major Development Variation 2 - Public Environmental Report

To the State Commission Assessment Panel members,

I wish to raise my objection to the proposed Helicopter Landing Facility as part of the Peregrine Corporation's Headquarters redevelopment to be duly noted. I make reference to the Public Environment Report for which is currently out for public viewing.

I bring to your attention the following comments made in the Aviation Specialist Advice Report prepared by Colin Weir May 2019, Public Environment Report, Aviation Extract of which 7 pages have been withheld for public examination.

Referring to page 19 of said report I bring to your attention points 3 and 5 of the Conclusion that has been signed by [REDACTED] CEO of Flight Safety Group

- There are no provisional options that have to been researched;
- The report is complete and accurate.

The final point is most damning.

In writing to the State Commission Assessment Panel members I bring to your attention at least one of the emergency landing areas chosen should be considered most inappropriate and potentially lethal to the general public. The Marryatville Primary Oval has been identified as an emergency landing area. As I can find no representative based in Adelaide, I strongly suspect that the observations made by [REDACTED] were made through the use of satellite imagery such as Google, Nearmaps or similar. This assumption is made because the report that he is the signatory of does not state that there is a South Australian Power Networks (SAPN) high voltage powerline running across the oval dividing it equally in two.

The oval, amongst others that have been identified are public spaces and not reserved for corporate use. In the report they are identified as "Safe" landing areas should catastrophic mechanical failure occur. By definition "Catastrophic Failure" would identify the lack of ability to control an aircraft, in this case a helicopter, and thus the ability to guarantee the avoidance of the SAPN asset, a high voltage powerline.

An aircraft with spinning rotary mass would suffer catastrophic physical damage should it land on the Marryatville Primary playground AND connect with the SAPN asset that has failed to be identified in the report that has been used to support the safety of the developments Helipad..

This one omission from the report should raise significant concern for the State Commission Assessment Panel members as it identifies that the report has not been undertaken in a thorough and professional manor. What other areas have been overlooked to facilitate a favourable report to primarily support the development of a Helipad in a residential area?

I will also raise the facts that the overshadowing and the removal of the effected rights to Northern light caused by the proposed development, especially during the winter months should be considered unacceptable; corporate greed over that of ordinary people.

I urge each panel member to consider the above points when making a final decision.

Kind regards,

[REDACTED]



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

*Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.*

Name ..... Address ..... Kensington Park .....  
Telephone ..... Email .....

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other ..... Mother of children attending Marryatville Primary which has been proposed as an alternative landing site

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

Yes. My first concern is that my children's school (Marryatville Primary) has been suggested as an alternative landing site for the helicopter(s) which is ridiculous. The oval is used regularly both in school hours and outside school hours by students, locals and sporting groups. I know that there are numerous private helipads in the Burnside area and I think the owners of Peregrine Corporation live in the Burnside area. Do they have a private helipad that has been suggested as an alternative landing site if required. Or better yet stop the helipad on the Peregrine building going ahead completely and if they wish to transport customers to Tailern Bend they can do this from their own helipad. It is still unknown how many times per day the helicopters will be taking off and landing. Being so close to a major thoroughfare on Portrush Road poses so many risks.





[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 4:42 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Objection to Peregrine Corporation Helipad Application

**The Minister for Planning**

[REDACTED]  
Department of Planning, Transport and Infrastructure  
GPO Box 1815, Adelaide SA 5000  
[REDACTED]

**Re: Objection to Peregrine Corporation's Amended Development Application for construction and use of a Helipad at 270 The Parade, Kensington – Public Environment Report**

Dear Sir,

I own and reside in a property in [REDACTED], Beulah Park.

From maps and other information in the public report it appears that the preferred flight path, for helicopters taking off from the proposed Peregrine Helipad facility, is directly over my house.

I understand that authority is being sought to operate helicopters from the site for up to 10 days a year and that there is no upper limit on the number of flights that might be scheduled on any one of those days. I could therefore reasonably expect my property to be overflown, at low level, up to 100 times a year.

Information provided by the company suggests that I would be exposed to noise levels between 85 and 95 dB for several minutes as each flight approaches and passes over my house. The applicant suggests that such noise levels are not intrusive or annoying because the background noise levels from Portrush Road are already high. This argument is specious.

I am not affected by traffic noise from Portrush Road. It is barely audible from my house since it originates at ground level and is baffled by surrounding buildings. However, if this proposal is approved, I will certainly be affected by the noise of helicopters flying directly over my house.

I am primarily concerned about:

- the negative impact on my life, including loss of amenity and privacy in a residential area;
- the potential loss in value of my house, associated with living directly under a flight path;
- safety, in the event of a catastrophic failure of an aircraft while in flight, low over my house.

I also have broader concerns about:

- the increased risk to schools and public spaces, which are designated as emergency landing sites;
- further erosion of the character of the neighbourhood in which I live, which includes historically significant properties and the heritage listed Clayton Wesley Church;

- the completely inappropriate concept of operating a private airport facility in such close proximity to otherwise quiet residential areas and a village style shopping precinct.

The applicants have provided no data or convincing argument as to how the proposal will benefit the local community or the State in any way. In fact, they openly acknowledge that there will be no benefit for local communities. Nor was the Helipad part of the original building application or approval process.

How can this significant, and contentious, new component of the development be treated simply as a variation to the original application?

I am strongly opposed to Peregrine's proposal. It seems entirely self-indulgent and, if approved, would be detrimental to me personally and to the community in which I live.

Yours sincerely,

[Redacted signature]

[Redacted address]

Beulah Park, SA, 5067

13 March 2020

[REDACTED]

12 March 2020

Minister for Planning

[REDACTED]

DPTI

[REDACTED]

Dear Minister,

**Re: Application for Variation to the Commercial Development Proposal for the Peregrine Site**

[REDACTED] Marryatville resident to ask you to recommend to reject the application for Variation to the Commercial Development Proposal for the Peregrine Site to include Helipads on the roof of the development.

My partner, [REDACTED], owns an apartment in Nuova at [REDACTED] which faces east looking directly at the Peregrine site. I live in the [REDACTED] at Marryatville, directly under the flight path for helicopters taking joy rides to the Tailem Bend racetrack. We strongly object to the Application for Variation from both personal and broader community amenity and safety perspectives.

Upon reading the submission for variation, I find their argument for the objectives and the need for a Cabinet Approval to allow at least one but potentially two helicopter landing sites on the site is:

1. not commercially credible and
2. the risk of accident, destruction of property value and amenity imposed on the local community to be disproportionate to the "personal pleasurable experience" offered to a handful of overseas guests 10 days a year, if we are to believe the proposal.

At 2.1.2 of the Submission Peregrine argues that the "... helicopter landing facility is seen as an integral component of the overall redevelopment of the site". This argument seems disingenuous given this application has been made as a late variation only after the project has been approved, having been given major project status, where its inclusion was conspicuously absent.

Even if I were to accept that the development of this site has major economic productivity benefits for the South Australian economy, I contest the assertion in this Helicopter Variation Application that "... the flow on effect of this service is expected to be beneficial to the South Australian economy". In fact, the conclusion of the submission asserts that the flights will not be commercial in nature and will only operate for 10 days per year for the for personal pleasure of overseas guests.

It is hard to understand how 10 days use of a helipad will generate sufficient economic activity for the state to offset the following costs and risks imposed on the community:

[REDACTED]

1. Risk of accidents in a built-up residential area which is also home to seven schools, listed below, six heritage listed buildings, a convent and many aged care residential facilities surrounding the site

- a. Saint Ignatius

- b. St Joseph's Memorial School

- c. Mary McKillop

- d. Marryatville Primary School

- e. Marryatville High School (2 campus's)

- f. [REDACTED] and [REDACTED]

- g. Pembroke

2. Statistically helicopters have significantly higher risk of crashing than aircraft exposing the local community to unacceptable risk. The recent death of Kobe Bryant in circumstances where a helicopter flew despite unsafe prevailing weather conditions tragically illustrates the real risk we face.

[REDACTED] in the plans, styled emergency landing, doubles the articulated usage and risk levels. There is no proposal for regulatory monitoring of the helicopter use.

4. It will create a significant increase in noise levels. The proposal is for use 10 days per year during daylight hours. As daylight hours vary during the year between 5.00 am or 9.00 pm and 2 helipads could be in use this may amount to significant noise from many flights.

5. Helicopter use should be confined to the airport facilities which are purpose built to ensure community safety, with proper airspace controls, emergency response and appropriate noise and control over other disruptive impacts.

6. While the community accepts the risk of helicopter access to our tertiary hospitals for victims of motor vehicle and other emergency retrievals, this application has no such community benefit and sets an unacceptable precedent for other similar applications/ventures.

7. Immediate neighbours will suffer an unacceptable and unexpected fall in property values. Residents in the recently completed Nuova building would not have bought their apartments if they knew of such a development across the road, which was granted major development status by the previous government, thereby denying the opportunity for community input into the approval of the development.

The local electorate is very passionate about their objection to this development which only gained support through the previous government's support of the project by giving it major project status.

[REDACTED]

Many of us are outraged by this subsequent proposed application for variation. I trust you and your cabinet colleagues will reject this application.

Yours sincerely

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 13 March 2020 4:57 PM  
**To:** DPTI:State Commission Assessment Panel  
**Subject:** Strong objection to Peregrine Corporation helipad

Hi

I want to voice my STRONG objection to the proposed helipad on top of the Peregrine Corporation Headquarters on Portrush Road/The Parade.

I am a resident who lives just off [REDACTED] I travel down there every day. I am absolutely astonished that there could be any consideration for this to go ahead.

The safety risks are enormous. My children go to the local primary and high schools. I in no way give permission for a helicopter to land in their schools.

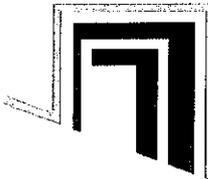
The worst part about this is the complete inappropriateness of the location. This kind of helicopter pad belongs in an airport - not a highly developed, urban area, with heritage houses and a heritage church nearby. The noise pollution will be great and there is no guarantee that they won't land their helicopters multiple times per day because there is no restrictions on how many times per day it could be. There will also be an impact on local wildlife. I can't even imagine what the impact will be on the traffic in the area. It's bad enough that they are building their awful building which is also inappropriately large (with not enough parking for the area, which will impact on my drive to work).

I am so angry that this is even being considered. The greed of the Peregrine Corporation and their obvious desire to show off their wealth is really quite disgusting.

This is completely inappropriate. It should not go ahead. I will be extremely angry if this is to get off the ground. I can't voice that strongly enough.

Thank you

[REDACTED]  
Kensington SA 5068  
[REDACTED]



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name [REDACTED] ..... Address [REDACTED]  
Telephone [REDACTED] ..... Email [REDACTED]

#### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

#### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

#### Do you have concerns regarding the proposed development?

I have multiple concerns:

1. Noise is too high, from helicopter
2. Safety at nearby schools from landing helicopters
3. It detracts from the amenity of residents
4. It is incompatible with the surrounding uses
5. It has little or no benefit to the community (the helipad).



Government of South Australia

Department of Planning,  
Transport and Infrastructure

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Fwd: Major development proposal - Peregrine mixed use - Variation 2 Helicopter Landing Facility [SEC=UNOFFICIAL]  
**Date:** Friday, 13 March 2020 5:58:38 PM

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[REDACTED]  
The very fact we are writing to object to this proposal in a residential area is laughable. However, I understand this is the process to follow so here goes.  
Environment Protection Authority (EPA) requirements  
Helicopter landing facilities are an Activity of Environmental Significance as described in Schedule 1, Activity 8(3) of the Environment Protection Act 1993. In order to carry out this activity, they need authorisation from the EPA in the way of a licence.  
Peregrine are assuming that proposing to only use the facility less than 10 days a year, this will negate the need for an EPA licence and the stringent requirements that come with this.

I believe they are misinformed about the requirement for an EPA licence and that the requirement hinges on the fact that they are within 1 km of a residential property not associated with the facility. Refer below

Schedule 1, Activity 8

(3) Helicopter Landing Facilities

the conduct of facilities designed for the arrival and departure of helicopters, but excluding

- 
- (a) facilities at an aerodrome licensed under Part 6; or
- (b) facilities at which helicopter arrivals or departures take place on not more than 10 days per year; or
- (c) facilities that are situated more than 1 kilometre from residential premises not associated with the facilities; or
- (d) facilities at the site of an activity authorised under the Mining Act 1971, the Petroleum Act 2000, the Petroleum (Submerged Lands) Act 1982 or the Roxby Downs (Indenture Ratification) Act 1982.

The fact that Helicopter landing facilities are considered by the Environment Protection Act 1993 as an Activity of Environmental Significance confirms the high risk of environmental harm occurring as a result of the activity and the need to mitigate these risks to every reasonable and practicable extent available. In this case, a helicopter landing facility that is not for emergency purposes or integral to the functioning of the Peregrine facility, the best way to mitigate the risk of harm occurring is to avoid the activity in the beginning (as per the hierarchy of mitigation). It is unlikely that the impacts on residential properties in the very immediate vicinity can be satisfactorily mitigated through the conditions of a licence.

In the unlikely event that the helicopter landing facility is not captured by the requirements of the

Environment Protection Act 1993 as an activity of environmental significance, the nuisance noise generated by this facility will undoubtedly be considered to be an environmental nuisance which is considered environmental harm under the same act.

Section 3 (1) environmental nuisance means—

- (a) any adverse effect on an amenity value of an area that—
  - (i) is caused by pollution; and

(ii) unreasonably interferes with or is likely to interfere unreasonably with the enjoyment of the area by persons occupying a place within, or lawfully resorting to, the area; or

(b) any unsightly or offensive condition caused by pollution;

#### Section 5 Environmental Harm

(1) For the purposes of this Act, environmental harm is any harm, or potential harm, to the environment (of whatever degree or duration) and includes—

(a) an environmental nuisance; and

(b) anything declared by regulation to be environmental harm for the purposes of this Act (following consultation by the Minister on the regulation with prescribed bodies in accordance with the regulations); and

(c) anything declared by an environment protection policy to be environmental harm for the purposes of this Act.

(2) For the purposes of this Act, potential harm includes risk of harm and future harm.

(3) For the purposes of this Act, the following provisions are to be applied in determining whether environmental harm is material environmental harm or serious environmental harm:

(a) environmental harm is to be treated as material environmental harm if—

(i) it consists of an environmental nuisance of a high impact or on a wide scale; or

(ii) it involves actual or potential harm to the health or safety of human beings that is not trivial, or other actual or potential environmental harm (not being merely an environmental nuisance) that is not trivial; or

(iii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$5 000;

(b) environmental harm is to be treated as serious environmental harm if—

(i) it involves actual or potential harm to the health or safety of human beings that is of a high impact or on a wide scale, or other actual or potential environmental harm (not being merely an environmental nuisance) that is of a high impact or on a wide scale; or

(ii) it results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$50 000.

In this case, given the number of potentially impacted dwellings, community centres and the general amenity of the area, the environmental nuisance is likely to be considered material environmental harm. Why would something be approved that is highly likely to cause environmental harm on such a high impact or wide scale.

Local Nuisance and Litter Control Act 2106 requirements

Local Nuisance is defined in Section 17 (1) of this Act which is applicable

#### 17—Meaning of local nuisance

(1) For the purposes of this Act, local nuisance is—

(a) any

adverse effect on an amenity value of an area that—

(i) is caused by—

(A) noise, odour, smoke, fumes, aerosols or dust; or

(B) animals, whether dead or alive; or

(C) any other agent or class of agent declared by

Schedule 1;

and

(ii) unreasonably interferes with or is likely to interfere unreasonably with the enjoyment of the area by persons occupying a place within, or lawfully resorting to, the area;

In the unlikely event that the helicopter landing facility is not captured by the requirements of the

Environment Protection Act 1993 as an activity of environmental significance, the nuisance that this facility will create will be captured by the requirements of the Local Nuisance and Litter Control Act 2016 as described above. Enforcing this Act is primarily the responsibility of the Local Council, unless.

Noise

Obviously the noise generated from the helicopters approach flight, landing, hovering and taking off will affect the amenity value of this area. This is not a common noise for this area and it will certainly be noticeable and affect the amenity value of the area as whole and of people enjoying time in their own properties. This is definitely not acceptable

Frequency of use

It is exceptionally frustrating that the proponents were unable to specify the number of landings and take-offs that would occur on the 10 days that they plan to use this facility.

Given there is accommodation within the new building it could be safely assumed that people staying there could be ferried to and from the building non-stop all day on those 10 days.

It is also disappointing that the facility is proposed to be used all days of the week from 24 minutes before sunrise to 24 minutes after sunset. This is totally unacceptable for such an indulgence.

Compliance

Irrespective of what approvals this ridiculous proposal might be approved under, it is unlikely that Peregrine will comply. From an economic perspective, it will be worth more to their company to pay fines and expiations than it will be

to comply with restrictions on time frame and days of operation. It would be completely naïve to believe that the operation of the facility will comply with restrictions. The easiest way to regulate this it to avoid it in the first place.

Community respect and value

I find it arrogant and insulting that this company is presenting themselves as a community minded organisation. We represent their immediate community and they are showing very little respect for us, the amenity value of the area that supports

them and the wider community in which they propose to install this monstrosity and indulgence.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

BEULAH PARK  
SA 5067

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Heli pad Norwood Kensington  
**Date:** Friday, 13 March 2020 6:02:53 PM

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To whom it may concern

A Heli pad in suburbia is totally inappropriate. The noise pollution would be extreme. Such infrastructure should be at an airport or in a more industrial area. Not Norwood Kensington.

I live in Norwood and understand the noise less feel. We get helicopters going over on their way to the RAH. And it is reasonably loud at that altitude. Little only landing and taking off from the top of a building.

Totally object to this development.

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Peregrine development  
**Date:** Friday, 13 March 2020 6:17:28 PM

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Dear Sir/Madam,

As a resident of Norwood, I have serious concerns about the proposed helipad. Peregrine's proposal doesn't seem to have considered the potential impact on the Clayton Wesley Church in a serious way, in terms of the rotor down draught. Similarly, suggesting that the noise of operations is acceptable as there were short-term noise events during their monitoring is disingenuous. And the limit of operations being only during 10 days doesn't give peace of mind or surety when no firm structures are placed around that in terms of numbers per day, frequency or so on.

I am fortunate that I don't live close to the site, but I already have to put up with noise from jets screaming straight at our house during the V8s. That very short period of intense noise on only one day is disruptive and distressing to children and pets, to the extent that I try to make sure I'm not at home that day - I cannot enjoy a reasonable peace in my own home, even after installing double-glazing. This is annoying as my home is otherwise sheltered from noise thanks to surrounding buildings, and the choice in where I live has reflected my desire for peace - but for one day a year, and taking into account the benefit to large numbers of people, it is considered acceptable. But over 10 days, for the benefit of maybe half a dozen people??

Noise is one thing for people who choose to live along an arterial road, but where in Adelaide can you live in peace if helicopter flights over your house are allowed, and take-off/landing next door? Peregrine's proposal would inflict impacts on immediate neighbours, but even not-so-close residents such as myself will be forced to tolerate invasive noise.

Yours sincerely,

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:State Commission Assessment Panel](#)  
**Subject:** Public Environment Report (PER) Peregrine Mixed Use Major Development  
**Date:** Friday, 13 March 2020 6:21:49 PM

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Minister for Planning

[REDACTED]

Unit Manager Policy and Strategic Assessment

We are concerned residents of Kensington who have lived in the area for over twenty years. We live in one of the oldest residences in the area and have enjoyed the amenity that this historical and community-centric suburb offers.

The development of the Peregrine Mixed Use Project is a natural progression of the commercial activity of The Parade and supports the development of local SA business. This, I understand.

What is beyond my comprehension is the requirement for two helipads within a low-rise residential area.

The urban amenity provided across this suburb extends not only to the built form and landscape character of the street and open spaces but to the soundscape of the suburb.

Parrots, town hall clock chimes, people talking in the street, the joyful chatter of children in the various school playground are a constant soundtrack. It is this subtle, and yet intrinsic amenity that is an integral part of the Kensington suburb's character.

I acknowledge that the noise trucks and cars along Portrush Road form occasional disruptions. However, these urban noises form no more than passing background interruptions.

The Peregrine Helicopter Landing Facility does little to enhance this amenity.

The idea that ten days a year could be impacted is too many when compared to the underlying sound amenity that exists in Kensington day-to-day. A similar comment would extend to the impact on The Parade and the disturbance to shopper, diners and pedestrians.

It is extraordinary that the impact of noise on nearby sensitive land uses has not been assessed against the provisions of the Environmental Protection (Noise) Policy 2007. This work needs to be undertaken.

### **Measures to Minimise Noise**

There also seems to be several contradictions in the 'measures to minimise noise'. The central local of the helipad, while limiting noise spill the adjacent properties, is likely to extend consequential noise to local residential properties and more importantly, Mary McKillop Kindergarten. This facility is used by very young children with an increased sensitivity to sudden loud noises.

The operational statement suggests that flights would be during daylight hours. However, the measure to minimize noise indicates an operation period of 7AM to 10PM. The two periods suggest ambiguity in operation times and the potential to limit the mitigation of noise.

### **Predicted Noise and Comparison with Existing Noise**

The suggestion that predicted maximum levels are regularly exceeded in the existing noise environment are a miss leading comparison. The noise associated with truck air-breaks is an acknowledged sound that is experienced along Portrush Road. The same

noise is experienced for distances in excess of 500m across the Kensington suburb. The noise source is brief, lasting several second (as Figure 5.2 demonstrates) and located at a low elevation where buildings provide a degree of acoustic protection. While the data may suggest that the existing maximum noise levels of Bowen Street are equivalent to the noise of the three helicopters, the noise profile, anticipated duration and elevation of the noise source would be significantly different.

The rationale proposed in the report is simplistic and does not take account of the contextual location of the sensitive noise receptors in the residential suburb.

We disagree that all reasonable and practicable measures have been undertaken. The measures do not fully appreciate the existing context and amenity that is currently experienced by the local community of Kensington. The report does not represent a critical assessment of the issue.

Finally, there is an overarching consideration of need, assessed against social and environmental factors. While these are not aspects that the Development Plan can consider, the transportation of individuals by helicopter is extravagant. The site is not inaccessible, and the individuals are not subject to significant danger or risk that would warrant air flight for their safety and social well-being. Finally, the embodied carbon cost of helicopter flight ensures that this mode of transport will contribute to climate change.

In conclusion, the variation for the Peregrine Helicopter Landing Facility 270 The Parade Kensington Gardens is a poorly considered variation to the mixed used development. The proposal serves a few individuals, marginally improving their travelling experience. By contrast, the impact and loss amenity that the project will cause to an entire community is significant.

In our opinion, the benefits do not out way impacts, and we encourage you to refuse the Peregrine Helicopter Landing Facility 270 The Parade Kensington Gardens.

Kind Regards,

[REDACTED]

[REDACTED]

Local Residents to Kensington

*We acknowledge the Traditional Custodians of the land on which I work and live, and recognise their continuing connection to land, water and community. We pay respect to Elders past, present and emerging.*

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[REDACTED]  
Beulah Park SA 5067

Minister for Planning  
[REDACTED]

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
Adelaide SA 5000

Dear Minister,

I am writing to voice my concern for the proposed helipad at the Peregrine site in Kensington. This site situated within the leafy eastern suburbs is no place for such a hazard.

It is of great concern that the 6 of the 7 options for landing should there be catastrophic engine failure are local schools, and as helicopters are responsible for one quarter of aviation accidents, this is simply a tragedy waiting to happen.

The noise that helicopters emit is again of great trepidation. As this area is home to many schools and child care centres, having the noise level of a front end loader hovering over our homes and businesses between 7am to 10pm would be devastating.

As a staff member at nearby Burnside Hospital, this proposal would not only affect me while at work, but also while in my now private home. As like the people within this community, I value my privacy and do not want to feel exploited by having strangers hovering over my home and my young grandchildren.

Yours Faithfully,

[REDACTED]

**From:** [REDACTED]  
**To:** [DPTI:Minister\\_Knoll](mailto:DPTI:Minister_Knoll); [bragg@parliament.sa.gov.au](mailto:bragg@parliament.sa.gov.au); [dunstan@parliament.sa.gov.au](mailto:dunstan@parliament.sa.gov.au); [DPTI:State Commission Assessment Panel](#)  
**Subject:** Stop Peregrine Helipad  
**Date:** Friday, 13 March 2020 11:55:36 PM

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I oppose the granting of a helipad on the Peregrine site on a number of grounds.

1. From Peregrine's PER it says "Given the limited number of operative days, the non-commercial nature of the flights and limitation to daylight hours it is our understanding that the **use does not trigger a requirement for any approval or licencing from the EPA, Casa (Civil Aviation Authority) or any other regulatory body.**" I believe this to be very dangerous legally.
2. To nominate school ovals as a backup landing for helicopters is, in my opinion, irresponsible as possible injury to students and teachers at the various schools if this option took place in an emergency.
3. They nominate only daylight hours in the PER, but state that the flights would operate between 7:00 am and 10:00 pm. That range can hardly qualify as "daylight hours".
4. Possible accidents involving Clayton Church spire increases the risk in the operations of the helicopters.
5. Noise pollution near two nearby aged care facilities as well as the air pollution is unacceptable.

Please refuse such a proposition from Peregrine.

Yours without prejudice

[REDACTED]



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name .....

Address .....

Telephone .....

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

Yes, a helipad located at the headquarters of Peregrine Corporations in Kensington, would put the public at risk. Given the significant built-up surrounding residential area and the high volume of traffic along, The Parade and Portrush Road.



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Peregrine could not build a helipad in Kensington, Adelaide, since it brings no benefits to the community, on the contrary, building a helipad causes anxiety and distress to the community. Since helicopter crashes are most common during landing and take-off, building one in Kensington would cause panic.

Other general comments: other disadvantages to the community include:

- Noise
- Pollution
- Putting students at risk of losing their lives, in case of an emergency landing.
- Putting the community at risk, considering Peregrine said, in case of an emergency, they are permitted to land in peoples backyards,
- Lower quality of life of the people living in the community.
- Lowering property value in Kensington, Norwood and surrounding areas.

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning [Redacted] Department of Planning, Transport and Infrastructure GPO Box 1815 ADELAIDE SA 5000	[Redacted]
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# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

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### TELL US WHAT YOU THINK

Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.

Name [REDACTED] ..... Address [REDACTED]  
Telephone ..... Email .. [REDACTED]

### What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

### What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

### Do you have concerns regarding the proposed development?

*I do not think a helicopter landing facility belongs in this location, which is surrounded by residential streets and adjacent to one of Adelaide's oldest and tallest church spires.*

*As a resident of the area, my concern is with the significant loss of amenity that would be caused by helicopter activity here. The noise would be unbearable and I cannot see how the proponent could promise that it would "only" be used 10 days in the year. Nor is an emergency landing site needed here.*





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning  
[REDACTED],  
Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[REDACTED]



Government of South Australia  
Department of Planning,  
Transport and Infrastructure

[REDACTED]

12 March 2020

Minister for Planning

c/- Robert Kleeman

DPTI

[REDACTED] au

[REDACTED] **the Commercial Development Proposal for the Peregrine Site**

[REDACTED] resident to ask you to recommend to reject the application for Variation to the [REDACTED] for the Peregrine Site to include Helipads on the roof of the development.

[REDACTED] the Parade which faces east looking directly at the Peregrine site. I live in the Crescent at Marryatville, directly under the flight path for helicopters taking joy rides to the Tailem Bend racetrack. We strongly object to the Application for Variation from both personal and broader community amenity and safety perspectives.

Upon reading the submission for variation, I find their argument for the objectives and the need for a Cabinet Approval to allow at least one but potentially two helicopter landing sites on the site is:

1. not commercially credible and
2. the risk of accident, destruction of property value and amenity imposed on the local community to be disproportionate to the *"personal pleasurable experience"* offered to a handful of overseas guests 10 days a year, if we are to believe the proposal.

At 2.1.2 of the Submission Peregrine argues that the *"... helicopter landing facility is seen as an integral component of the overall redevelopment of the site"*. This argument seems disingenuous given this application has been made as a late variation only after the project has been approved, having been given major project status, where its inclusion was conspicuously absent.

Even if I were to accept that the development of this site has major economic productivity benefits for the South Australian economy, I contest the assertion in this Helicopter Variation Application that *"... the flow on effect of this service is expected to be beneficial to the South Australian economy"*. In fact, the conclusion of the submission asserts that the flights will not be commercial in nature and will only operate for 10 days per year for the for personal pleasure of overseas guests.

It is hard to understand how 10 days use of a helipad will generate sufficient economic activity for the state to offset the following costs and risks imposed on the community:

[REDACTED]

1. Risk of accidents in a built-up residential area which is also home to seven schools, listed below, six heritage listed buildings, a convent and many aged care residential facilities surrounding the site

- a. Saint Ignatius
- b. St Joseph's Memorial School
- c. Mary McKillop
- d. Marryatville Primary School

[REDACTED] school (2 campus's)

[REDACTED] the significantly higher risk of crashing than aircraft exposing the local community to a recent death of Kobe Bryant in circumstances where a helicopter flew despite conditions tragically illustrates the real risk we face.

[REDACTED] ns, styled emergency landing, doubles the articulated usage and risk levels. regulatory monitoring of the helicopter use.

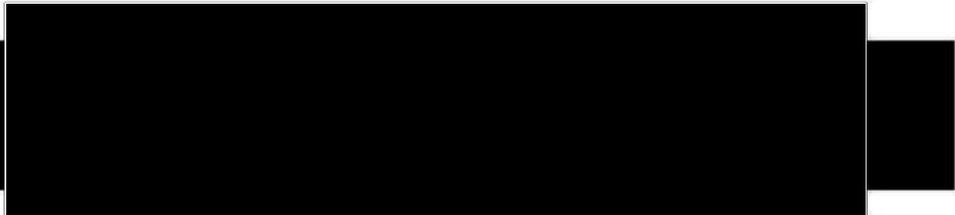
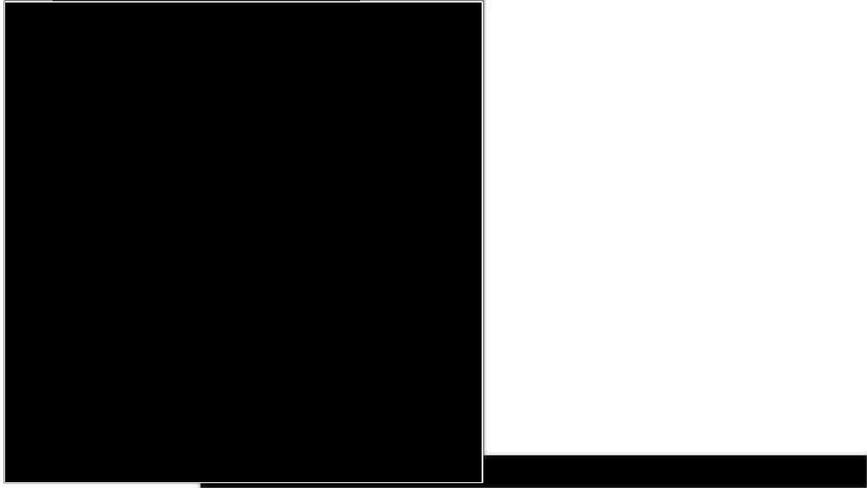
- 4. It will create a significant increase in noise levels. The proposal is for use 10 days per year during daylight hours. As daylight hours vary during the year between 5.00 am or 9.00 pm and 2 helipads could be in use this may amount to significant noise from many flights.
- 5. Helicopter use should be confined to the airport facilities which are purpose built to ensure community safety, with proper airspace controls, emergency response and appropriate noise and control over other disruptive impacts.
- 6. While the community accepts the risk of helicopter access to our tertiary hospitals for victims of motor vehicle and other emergency retrievals, this application has no such community benefit and sets an unacceptable precedent for other similar applications/ventures.
- 7. Immediate neighbours will suffer an unacceptable and unexpected fall in property values. Residents in the recently completed Nuova building would not have bought their apartments if they knew of such a development across the road, which was granted major development status by the previous government, thereby denying the opportunity for community input into the approval of the development.

The local electorate is very passionate about their objection to this development which only gained support through the previous government's support of the project by giving it major project status.



Many of us are outraged by this subsequent proposed application for variation. I trust you and your cabinet colleagues will reject this application.

Yours sincerely





# Major Development Proposal

## Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

The Public Environmental Report (PER) for Variation 2 is currently on public consultation

### TELL US WHAT YOU THINK

*Submissions will be made publicly available and will be included in the proponent's Response Document (that will be released for public information at a later date). Please indicate below if you object to your submission being made available in this way.*



What is your interest in this proposed development?

- Neighbour
- Local resident
- Business operator
- Community group
- Landowner
- Other .....

What is your overall position on the proposed development?

- I support the development
- I support the development with some concerns
- Neutral
- I oppose the development

Do you have concerns regarding the proposed development?

YES. OUR CONCERN IS OF SAFETY. THIS IS A RESIDENTIAL AREA WITH A HIGH NUMBER OF SCHOOLS. HELICOPTERS HAVE A HIGH ACCIDENT RATE AS DO UNSCHEDULED FLIGHTS. SUBURBIA IS NOT THE PLACE FOR AIRCRAFT TO BE LANDING AND TAKING OFF.





## Major Development Proposal Peregrine Mixed Use Major Development – Variation 2 Helicopter Landing Facility

What could be done to address your concerns?

Other general comments:

Written submissions commenting on the PER are invited until 5pm Friday 13 March 2020 addressed to:

Minister for Planning

Department of Planning, Transport and Infrastructure  
GPO Box 1815  
ADELAIDE SA 5000

[Redacted]



Government of South Australia  
Department of Planning,  
Transport and Infrastructure



# VICKIE CHAPMAN MP

MEMBER FOR BRAGG



19 March 2019



Hon Stephan Knoll MP  
Minister for Transport, Infrastructure and Local Government  
GPO Box 1533  
ADELAIDE SA 5001

Dear Minister Knoll,

I write on behalf of [redacted], a resident of the Mary MacKillop Precinct, regarding the Peregrine Corporation's application to install a helipad.

[redacted] is calling upon the State Government to deny approval for the Peregrine Corporation to create a Helicopter Landing Facility. She raises several concerns with the development that will affect those living in the area.

[redacted] argues there will be a significant impact on the quality of life in the neighbourhood, she believes the helicopter may cause potential damage to neighbouring historic buildings, and she is of the opinion the helicopter is a danger to human safety.

I enclose a copy of [redacted] correspondence and ask that you consider the concerns raised and provide me with information to assist in responding to her.

Yours sincerely

**HON VICKIE CHAPMAN MP**  
Deputy Premier  
Attorney-General  
Member for Bragg



357 Greenhill Road, Toorak Gardens SA 5065



(08) 8332 4799



bragg@parliament.sa.gov.au



www.vickiechapman.com.au



facebook.com/VickieChapmanMP



@VickieChapmanMP

16 March 2019

Hon Stephan Knoll  
Minister for Planning  
GPO Box 1533  
Adelaide Sa 5001

Dear Stephan,

***Concern re the Peregrine Application to install a helipad***

My request is simple: that, for the following reasons, you will do all in your power to deny approval for the Peregrine Corporation to create a Helicopter Landing Facility on the roof their proposed multi-storey building on the Portrush Road/The Parade/High Street corner:

1. ***Impact on the quality of life of neighbours:*** Peregrine is our next-door neighbour – only the width of High Street separates the Peregrine site from our historic Kensington Convent site, a large portion of which is listed on the State Heritage Register. Presently there are twenty Sisters living on this site, and this number will increase by at least 10 once the refurbishment of the former Tappeiner Court Nursing Home is completed. Our redevelopment project had been mooted long before the helipad proposal became known, and its purpose is to provide a peaceful environment for retired, elderly Sisters who are entitled to live in peace and security. Although a number of the Kensington Convent buildings are quite close to High Street, the Tappeiner Court building actually backs on to it! Can you imagine what it would be like for an elderly person living in a building which is only a few metres way from the noise, vibration, winds and the dust generated by helicopters?

On the northern side of High Street, and along Bowen Street, opposite the Peregrine building, are a number of private homes and units whose residents will also be negatively impacted by the new Peregrine office tower, both in the building stage and after completion. The addition of a helipad would have similar adverse effects as those impacting the Sisters of Saint Joseph.

We are well aware of Peregrine's official proposal that the helipad would be operational for only 10 days per year. This, however, is hard to believe, given the amount of money that would be required to build this facility. The Shahins are shrewd business people whose rapid expansion clearly demonstrates that they know how to secure a good return on their investments. It is not likely that their investment in a helipad would be treated any differently, especially when they have made known their plan to use three types of helicopters for their passengers. For just 10 days a year?

2. ***Potential damage to historic buildings:*** In addition to potential impact on our Josephite historic buildings, the presence of helicopters in the immediate vicinity will also threaten the survival of the nearby historic Clayton Uniting Church, with its fragile stained glass windows and landmark spire. Also, diagonally opposite the Peregrine site, is another historic church building with a tower-dome. This too is likely to be adversely affected by the vibration and wind generated by helicopters.

3. ***Danger to Human Safety:*** a visit to the Wikipedia website, using the search words 'helicopter crashes' leaves us in no doubt that helicopters, like aeroplanes and motor vehicles, are susceptible to crashes, whether caused by mechanical failure or pilot error. Please consider the potential human and material cost of a helicopter crash in the area:

- The planned Peregrine office tower will be located on an extremely busy suburban intersection, which thousands of vehicles, including numerous B-Double trucks cross every day
- There is a significant number of pedestrians who cross that intersection daily, from early morning till late evening
- There are four schools within a 500 metre radius of the Peregrine corner. Car and pedestrian traffic is extremely heavy during the before and after school times, and many parents and students cross at this intersection
- We have a number of relatively high structures in the vicinity of the proposed helipad: the Clayton church spire, the Russian Orthodox Church dome, the local water tower, the newly erected multi-storey apartment block adjoining the heritage 'Top Deck' building, the new apartment block at the Bath Hotel – all of which could pose a danger to low-flying helicopters.

The consequences of a helicopter crash in this area would be enormous, with potential for multiple fatalities and/or catastrophic injuries for survivors.

Thanks in anticipation of your Government's giving due consideration to my request that Peregrine *not* be granted permission to create their proposed Helicopter Landing Facility atop their [regretfully] approved multi-storey office building. I look forward to your response, and to the announcement of the Government's 'no' decision!

26 March 2020

The Honourable Stephan Knoll  
Minister for Planning

**Attention: Robert Kleeman**  
Unit Manager Policy and Strategic Assessment  
Planning and Land Use Services  
Department of Planning, Transport and Infrastructure

**SENT VIA E-MAIL: [majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)**

Dear Minister Knoll

**PEREGRINE MIXED USE MAJOR DEVELOPMENT VARIATION 2 – COMMUNITY  
FEEDBACK – COUNCIL RESPONSE**

I refer to the Peregrine Mixed Use Major Development Variation 2. I understand, from discussions with staff within your agency that the Department of Planning, Transport and Infrastructure (DPTI) is still in the process of collating and reviewing the submissions from the public notification process, and providing them to the Applicant and that it does not foresee any issues with including City of Burnside's comments as a late submission on this occasion.

The Council considered a Report at its meeting of 10 March 2020 and resolved to make a detailed submission in relation to the Public Environment Report (PER) submitted by the Peregrine Corporation. For your reference Council resolved as follows:

**C12483**

*That Council:*

1. *Note the Report.*
2. *That pursuant to Section 46C (5) (a) (ii); of the Development Act 1993 and Regulation 63D (1).of the Development Regulations 2008, the City of Burnside provides a detailed submission to the Minister for Planning, the Hon Stephan Knoll and the Department of Planning, Transport and Infrastructure in respect of the Public Environment Report submitted by the Peregrine Corporation for a helicopter landing facility at 270 The Parade, Kensington SA.*
3. *That the submission address the following:*
  - 3.1 *Council's concern that the risks to public safety associated with the proposed Development are totally unacceptable and have not been addressed by the documentation provided by the Applicant or the Department of Planning, Transport and Infrastructure.*

- 3.2 *Council considers that the multiple sites identified as Emergency Lay Down areas across Burnside are surrounded by homes, aged care facilities, schools and public reserves in a densely populated area and as such are therefore manifestly unsuitable areas for this purpose. The catastrophic failure of a helicopter taking off or landing at 270 The Parade presents an unacceptable risk to the safety of the residents, students and businesses who inhabit and use the areas of Beulah Park, Kensington Park and Kensington Gardens in particular, during the daylight hours that a helicopter would use the sites.*
- 3.3 *Council considers that a helicopter landing facility will have a significant adverse impact on the residential amenity for residents living in the adjacent suburb of Beulah Park in particular, and to the area more broadly, due to the noise emanating from Helicopters using a landing site at 270 The Parade Kensington.*

The Council's submission is made under two headings as set out below.

### **RISK TO PUBLIC SAFETY**

Council expresses concern that the risks to public safety associated with the proposed Development are unacceptable and have not been addressed by the documentation provided by the Applicant or the DPTI.

Council considers that the multiple sites identified by the Applicant as 'Emergency Lay Down' areas across Burnside are surrounded by homes, aged care facilities, schools and public reserves, in a densely populated area, and as such are manifestly unsuitable areas for this purpose. The catastrophic failure of a helicopter taking-off or landing at 270 The Parade presents an unacceptable risk to the safety of the residents, students and businesses who inhabit and use the areas of Beulah Park, Kensington Park and Kensington Gardens. This is in particular during daylight hours that a helicopter would use the sites.

While there is already a risk of helicopter emergencies inherent in the general public, it is believed that the risk will be enhanced with the introduction of this proposal, particularly as it was confirmed at the public briefing, that helicopters are more likely to be involved in an incident, within close proximity to taking-off or landing, compared with during its general flight path.

Across all aircraft, incidents are more likely to occur at the beginning or end of the flight when the aircraft is 'low and slow'; and when there is less time for a pilot to successfully react. Apart from pilot error, the most common reasons for helicopter crashes are lack of fuel and mechanical failure. Mechanical failure is the peril most feared because of its severity.

While a twin engine passenger jet can fly on one engine, the failure of a key helicopter component, such as the rotor and rotor shaft, main gearbox or tail rotor, can prove fatal. In no other form of aircraft is so much stress placed on single components.

Airliners are required to have, what regulators call, redundancy in vital components. This means that, as far as practicable, there needs to be alternative methods of propulsion and flight control so that if one system fails, another takes over.

Helicopters lack redundancy in most vital components. Although there may be two engines on larger helicopters, their power is directed to the main rotor through one gearbox and one rotor drive shaft. An airliner can lose an engine yet continue to fly safely. In contrast, helicopters do not have the same safety mechanism.

It is reiterated that the relevant site is not in an airport or other like open area with sufficient room surrounding the landing pad to cater for emergencies. There may be sufficient

opportunities in reserves in proximity to the building but not at the actual point of take-off and landing.

The second (concrete) proposed landing pad is acknowledged. However, there is no explanation as to why this would add to safety in any meaningful way. This comment is made based on the close proximity to the substantive landing pad. Without further explanation, the concrete landing pad, on the face of it, appears to be more suited to a second facility than an emergency facility.

**In summary, the Council considers that airports should be used for helicopter landings and take-offs and that the proposed building at 270 The Parade should not be used for this purpose.**

### **IMPACT ON AMENITY**

Council considers that a helicopter landing facility would have a significant adverse impact on the residential amenity for residents living in the adjacent suburb of Beulah Park and on the area more broadly, due to the noise emanating from helicopters using a landing site at 270 The Parade.

Despite noise modelling, it should be accepted that helicopters do make significant noise, wake and vibration which will have a high impact on residents due to the proximity of the site in relation to surrounding residents, particularly with new apartments and infill occurring in the vicinity. That is, this impact will be exacerbated by fear and anxiety in relation to helicopters in close proximity to built-up residential and populous area.

The proposal is for helicopters to only be used in daylight hours, and in any event not outside the hours of 7am and 10pm. There seems to be some incongruence between these two measures. According to the South Australian Government, the latest official sunset this summer was 8.33pm, running between 1 January and 13 January.

Even if sunset is not taken to mean the end of daylight hours, it is commonly understood that daylight, during the longest days of the year, would not extend much beyond 9pm, if at all.

There is a reference, on page 37 of the PER, that daylight hours means EPA defined daylight hours. At the time of writing of the report, no reference could be found in relation to the EPA and its definition of daylight hours.

Helicopters are not proposed to be used on more than ten days throughout any year. This does not necessarily equate to ten (or twenty) flights per year as multiple flights can occur on any of these days. When queried during the public session, an answer could not be given with respect to how many flights would occur on any of the days, and instead the number would only be constrained by the span of hours.

The number of flights would be also driven by the location and number of destinations and business efficiencies, noting that the stated benefit of the land facility is that it will greatly assist Peregrine Corporation in the efficient conduct of its business operations (page 38 of the PER).

Due to the impact on the residential amenity of the area, Council reiterates its view that airports should be used for helicopters landing and take-offs, and that the proposed building at 270 The Parade should not be used, or is suitable, for this purpose.

**If the proposal is supported**, it should be done so with a clearly defined span of hours, a maximum number of flights on each of the ten days, in the context of a publicly available monitoring and compliance system, with adequate reporting and control / complaint mechanisms.

Thank you for taking the time to consider Council's submission.

Yours sincerely



**Chris Cowley**  
Chief Executive Officer



City of  
**Norwood  
Payneham  
& St Peters**

13 March 2020

The Hon. Stephan Knoll MP  
C/O Mr Robert Kleeman  
Unit Manager Policy and Strategic Assessment  
Planning & Land Use Services  
Department of Planning, Transport and Infrastructure

by email: [Robert.Kleeman@sa.gov.au](mailto:Robert.Kleeman@sa.gov.au)  
[majordevadmin@sa.gov.au](mailto:majordevadmin@sa.gov.au)

Dear Minister Knoll

I refer to the Public Environment Report (PER) submitted by the Peregrine Corporation for a helicopter landing facility at 270 The Parade, Kensington, which has been referred to the Council for comment and report pursuant to Section 46C(5)(a) of the *Development Act 1993*.

The Council considered the PER at its meeting held on 2 March 2020 and resolved the following:

*That pursuant to Section 46C(5)(a) of the Development Act 1993 and Section 63E(b) of the Development Regulations 2008, the Council provides the following comments to the Minister for Planning, the Hon. Stephan Knoll MP and the Department of Planning, Transport and Infrastructure, in respect the Public Environment Report submitted by the Peregrine Corporation for a helicopter landing facility at 270 The Parade, Kensington:*

- 1. The Council considers that the public safety risks associated with the development are manifestly unacceptable and have not been adequately addressed in any of the documentation which has been provided by the applicant or the Department of Planning, Transport and Infrastructure.*
- 2. The Council considers that the proposed helicopter landing facility will have a significant adverse impact on the amenity for residents living in the surrounding residential area, through noise from helicopters using the landing facility.*
- 3. The Council considers that any authorisation which attempts to limit the use of the helicopter landing facility to ten (10) days per year is problematic and an improper use of a planning condition, as it would seek to limit the use of a facility that is clearly designed for far more intense usage and avoids dealing with the fundamental question of whether the use is appropriate in the first instance.*
- 4. That a copy of the staff report be provided to the Minister for Planning, to be considered in his assessment of the proposed helicopter landing facility.*
- 5. In the event that the Governor approves the development, the Council advises that it will give consideration to issuing an order to the owner of the land pursuant to Section 69 of the Development Act 1993, to not operate the facility due to a risk to safety arising out of the use of the helicopter landing pad.*

175 The Parade  
Norwood SA 5067

PO Box 204  
Kent Town SA 5071

Telephone  
8366 4555

Facsimile  
8332 6338

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

Website  
[www.npsp.sa.gov.au](http://www.npsp.sa.gov.au)



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In accordance with part 4. of the Council resolution, attached is a copy of the relevant section of the minutes of the Council meeting held on 2 March 2020, containing the staff report.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mark Thomson', with a long horizontal stroke extending to the right.

Mark Thomson  
**MANAGER, DEVELOPMENT ASSESSMENT**

Attach: Staff report to the Council meeting 2 March 2020

## 11.9 PEREGRINE CORPORATION HELICOPTER LANDING FACILITY PROPOSAL – 270 THE PARADE, KENSINGTON – FINAL DEVELOPMENT REPORT

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**REPORT AUTHOR:** Manager, Development Assessment  
**GENERAL MANAGER:** General Manager, Urban Planning & Environment  
**CONTACT NUMBER:** 8366 4501  
**FILE REFERENCE:** S/04198  
**ATTACHMENTS:** A - B

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### PURPOSE OF REPORT

The purpose of this report is to provide information to the Council in respect to a proposal by the Peregrine Corporation for a helicopter landing facility at 270 The Parade, Norwood and to enable the Council to provide formal comments on the proposal to the Minister for Planning and the Department of Planning, Transport and Infrastructure (DPTI).

### BACKGROUND

On 26 November 2015, the Chief Executive Officer of DPTI, acting as a delegate for the Minister for Planning, declared a mixed use development for 270 The Parade, Kensington, as a '*Major Development*', pursuant to Section 46 of the *Development Act 1993*. A *Major Development* is defined as a development or project of major environmental, social or economic importance.

On 16 May 2017, following the relevant assessment process, the Governor of South Australia approved the mixed use development.

On 19 September 2018, the Minister for Planning varied the Major Project declaration which was made on 26 November 2015, by amending it to include a helicopter landing facility on the roof of the building which was approved as a mixed use development on 16 May 2017.

Following the variation of the Major Project declaration, a Development Application for a mixed use development was lodged by the Peregrine Corporation with the Minister for Planning. The Application was forwarded to the State Commission Assessment Panel (SCAP), to determine what level of detailed assessment (assessment pathway) would be required for the proposal.

The three levels of detailed assessment, which can be required by the SCAP, are:

**An Environmental Impact Statement (EIS)** - required for the most complex proposals, where there is a wide range of issues to be investigated in depth;

**A Public Environmental Report (PER)** - sometimes referred to as a 'targeted EIS', required where the issues surrounding the proposal need investigation in depth but are narrower in scope and relatively well known;

**A Development Report (DR)** - the least complex level of assessment, which relies principally on existing information.

In this instance, the SCAP determined that the development proposal would be subject to the preparation of a Public Environment Report and subsequently issued Development Guidelines, which set out the level of assessment required and what issues that assessment should address.

The Development Guidelines for the Public Environment Report, were subject to public consultation in January 2019.

On 27 September 2016, the Council received a letter from DPTI, advising that consultation on the Public Environmental Report (PER) for the helicopter landing facility proposal, would undergo public consultation from 29 January 2020 until 13 March 2020. The letter also requested that the Council consider the PER and provide any comments by 13 March 2020. A copy of this letter is contained in **Attachment A**.

At the conclusion of the public consultation period, the Applicant will be provided with an opportunity to respond to the submissions, following which, the Minister for Planning (or his delegate), will prepare an Assessment Report, taking into account:

- (a) any submissions made; and
- (b) the proponent's response; and
- (c) any other comments provided by the Council, or other Authority or body; and
- (d) other comments or matters as the Minister thinks fit.

The final determination of the proposed development rests with the Governor of South Australia, pursuant to Section 48 of the Development Act 1993. In addition and importantly, the Application is not assessed against the relevant provisions of the Council's Development Plan. Rather, it must be assessed against Development Guidelines, which have been prepared and released by the SCAP, following public consultation on the draft Guidelines.

That said, as part of determining the Application, the Governor must have regard to, among other things, the extent to which the proposal is consistent with the relevant provisions of the Council's Development Plan. However, that is not the only consideration of relevance in the assessment. The Governor must also give regard to:

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

A copy of the Public Environment Report, including plans and associated technical reports, is contained in **Attachment B**.

#### **RELEVANT STRATEGIC DIRECTIONS & POLICIES**

Not Applicable. This matter relates to the consideration of a development proposal, against prescribed criteria.

#### **FINANCIAL AND BUDGET IMPLICATIONS**

Not Applicable.

#### **EXTERNAL ECONOMIC IMPLICATIONS**

With respect to economic effects of the proposed helicopter landing facility, the PER states:

*"The overall economic contribution from the development is a made up from the sum of many small parts, and the helipad is one of those parts.*

*Located on the roof of the new building, the helipad is an important component for Peregrine to service its business needs. The need for quick, accessible transport is paramount to ensuring a pleasurable experience for overseas and interstate business guests."*

It is understood that the proponent intends for overseas and interstate business guests to be flown to regional destinations of South Australia, including The Bend Motorsport Park, which is owned by the Peregrine Corporation. It is difficult to understand how there would be an advantage to the experience of those guests, in those flights departing from or arriving at Kensington, as opposed to the Adelaide Airport.

In any event, as it is proposed that the helicopter landing facility would be operated only up to ten (10) days per year, the economic benefit gained from any improvement to the experience of guests is difficult to understand or quantify.

## **SOCIAL ISSUES**

Amenity related impacts of the proposed development are considered in the Discussion section of this report.

## **CULTURAL ISSUES**

Not Applicable.

## **ENVIRONMENTAL ISSUES**

Environmental impacts associated with the helicopter landing facility are likely to primarily relate to noise and air emissions associated with helicopter movements to and from the site. The PER includes an Environmental Noise Report and a Sustainability Assessment. Environmental impacts of the proposed development are set out in the Discussion section of this report

Clause 8(3) of Schedule 1 of the *Environmental Protection Act 1993* prescribes the following as an activity of environmental significance, with certain exclusions:

### *Helicopter Landing Facilities*

*the conduct of facilities designed for the arrival and departure of helicopters, but excluding—*

- (a) facilities at an aerodrome licensed under Part 6; or*
- (b) facilities at which helicopter arrivals or departures take place on not more than 10 days per year; or*
- (c) facilities that are situated more than 1 kilometre from residential premises not associated with the facilities; or*
- (d) facilities at the site of an activity authorised under the Mining Act 1971, the Petroleum Act 2000, the Petroleum (Submerged Lands) Act 1982 or the Roxby Downs (Indenture Ratification) Act 1982.*

Therefore, as it is proposed that the helicopter landing facility will not be operated more than ten (10) days per year, it does not involve a prescribed activity of environmental significance, as defined by the *Environmental Protection Act 1993*.

In addition, the *Environment Protection (Noise) Policy 2007* does not apply to the proposed helicopter landing facility, as Clause 6(a) of the Policy provides that the Policy does not apply to a noise of a class set out in Schedule 1. Item 3 of Schedule 1 lists "aircraft or railway noise" as noise excluded from the Policy.

## **RESOURCE ISSUES**

Not Applicable.

## **RISK MANAGEMENT**

The PER includes a report which has been prepared by an Aviation Specialist. The report considers the impacts of the Helicopter Landing Facility on the locality, including safety risks. These risks are set out in the Discussion section of this report.

## **CONSULTATION**

- **Elected Members**  
The Council has until 13 March 2020 to comment on the PER.
- **Community**  
The Public Environment Report was subject to public consultation from 29 January 2020 until 13 March 2020. This process was managed by DPTI staff.
- **Staff**  
Manager, Development Assessment
- **Other Agencies**  
Not Applicable.

## DISCUSSION

The following commentary on the Development Application is not a comprehensive assessment of the proposal, as the Council is not considering this matter, as the relevant planning authority, charged with assessing and determining the Development Application. Rather, the commentary is focussed on key issues and impacts arising from the development proposal.

### Procedural Concerns

It has been proposed that the helicopter landing facility will be operated for up to ten (10) days per year. In lieu of any other explanation for applying a limit of ten (10) days, it is most likely that this limitation has been chosen to avoid the proposal constituting an activity of environmental significance pursuant to the *Environmental Protection Act 1993*.

DPTI staff have foreshadowed that in the event that an approval is granted to the helicopter landing facility, a condition will be imposed, purporting to limit the use of the facility to ten (10) days per year, with an onus on the Applicant to keep record of the usage. No limitation has been proposed for the number of times per day that the landing facility may be used on each of those ten days.

There are several legal authorities which are critical of planning authorities granting an approval to a development, whereby the obvious operating capacity of the development is sought to be 'capped' by way of condition. Whilst these legal authorities relate to assessments under the regular planning scheme (as opposed to the Major Development scheme), the criticism is in staff's view equally applicable.

In *McKenzie Constructions P/L v DAC and Others No. SCGRG-98-1429 Judgment No. S386 [1999] SASC 386* (24 September 1999), the full court of the Supreme Court said:

*"The primary question with which planning authorities are concerned is the question of land use, whether a proposed development, including a change of use, is compatible with the relevant provisions in the Development Plan and the orderly and proper planning of the locality. It is only when that question has been answered in the affirmative that the authority should concern itself with questions of management, and indeed there has been an alarming trend on the part of some planning authorities to use planning conditions to bring the management of the land, once planning approval has been given, under planning control and in some cases thereby to usurp the functions of other government or semi-government authorities."*

In *Remove-All-Rubbish Pty Ltd v City of Salisbury (supra)*, the Supreme Court said:

*"The primary concern of a planning authority is to control land use and the first question to be addressed should always be whether in the circumstances the proposed development is at least prima facie a suitable and appropriate use of the subject land having regard to the provisions of the Development Plan. To approach a planning decision by framing conditions designed to make a proposal suitable and appropriate is to bypass the primary question."*

In *DAC v Lawry*, which involved a proposal to divide land comprising a tourist/caravan park, the key planning issue was whether, post division, if the allotments were sold to individual owners or investors, those persons would seek to use them as permanent holiday homes, which would take them out of the pool of available tourist accommodation (the land being in a zone that promoted tourist accommodation, and discouraged permanent dwellings).

To get around that issue, the ERD Court imposed a number of conditions, including the following:

3. *No community lot, except for Piece 90, shall be occupied by its owner for more than four weeks in any three-month period.*
1. *No community lot, except for Piece 90, shall be occupied by any person other than its owner for more than two weeks in any three-month period.*
7. *The operator and caretaker shall keep records of all rentals and occupation of community lots for inspection by the Development Assessment Commission and the Mid-Murray Council so as to ensure compliance with the foregoing conditions.*

On appeal, a single judge of the Supreme Court (Bleby J) found that the conditions were invalid: *DAC v Lawry* [2011] SASC 14. The Judge said:

*While the ERDC also imposed a condition [7] requiring the operator and caretaker to keep records of all rentals and occupation of community lots for inspection by the DAC and the Mid-Murray Council "so as to ensure compliance with the foregoing conditions", such a condition is of doubtful validity. It purports to impose a personal obligation on a person who has no interest in the land. Furthermore, it places no obligation on the community lot holder to make any information available to the operator and caretaker. In short, the ability to police and enforce any of the above conditions becomes impracticable, quite apart from the validity of some of them*

The Judge then went on to summarise some fundamental principles regarding conditions, including that:

- conditions can only regulate incidental aspects of a development;
- conditions can't restrain the very nature or essence of a development;
- the planning authority can't hedge a development with conditions which are unworkable, unenforceable and seek to confine the development in a kind of strait jacket which will constrain the development from being used in the ordinary way;
- the use of conditions should only be contemplated where the planning authority has first determined that the fundamental land use is appropriate; and
- conditions can't be used to make acceptable what would otherwise be an unacceptable development.

On further appeal, the Full Court of the Supreme Court agreed with the Judge that the ERD Court's approach involved impermissible use of conditions.

By analogy, a condition that seeks to limit the use of the helipad to ten (10) days would require someone to keep records of use and to make those records available to the SCAP and/or the Council. The impracticality of policing and enforcing is obvious.

Accordingly, it would be improper for the Governor to grant approval to the proposed helicopter landing facility, which comprises two (2) helipads on the building and represents a large investment by the applicant, on the strength of assessing the impacts of its use up to ten (10) days per year. Clearly, the facility has the capacity to be operated far more frequently than ten days per year. The primary question of whether the impacts of the use of the landing facility generally should first be considered. Only if those broad impacts are considered acceptable, should there be some attempt to apply management and/or operating conditions.

### Safety Risk

Section 5.1.1 of the PER sets out the risks associated with operating the proposed helicopter landing facility and refers to a separate report prepared by an aviation specialist.

In the preamble to the Aviation Specialist Advice report (page 3), the author purports that the report will:

*"Evaluate the impacts of the Helicopter Landing Facility to the locality, including key risks, and identify required management techniques to mitigate and suitably address those impacts and risks, including but not limited to the following."*

However, nowhere in the report is there any overall evaluation of the risks associated with the proposed helicopter landing facility. Rather, the report documents the various risk management responses which are proposed, such as the design of the landing pad, emergency response plans, alternative landing facility options etc.

As the report does not constitute an objective evaluation of the resultant risk, it is considered that DPTI and ultimately the Governor, are not in a position to make an informed decision on the application based upon the information which has been provided.

Council representatives attended the public information session held at the Norwood Concert Hall on 18 February, where the author of the Aviation Specialist Advice report, Mr Colin Weir, advised that:

*“there has only been one emergency landing in this area in the past five years”*

and

*“the majority of incidents involving helicopters occur in proximity to take off / landing”*

Mr Weir was also asked to outline his experience with helicopter landing facilities in built-up residential areas and was only able to reference an example which was in fact within a major airport.

Despite the various responses to risk measures proposed in the Aviation Specialist Report, there is clearly an inherent risk of an incident, including a crash, occurring in proximity to the proposed helicopter landing facility. The consequences of such an incident would be catastrophic, given the significantly built-up surrounding residential area and the high volume of traffic along The Parade and Portrush Road. Applying a typical risk rating matrix, the resultant level of risk, based on a ‘possible’ likelihood and ‘severe’ consequences is extreme as set out in Table 1 below:

**TABLE 1: RISK MATRIX**

LIKELIHOOD	IMPACT				
	Catastrophic	Critical	Major	Moderate	Minor
Almost Certain	Extreme 1	Extreme 4	High 8	High 10	Substantial 15
Likely	Extreme 2	Extreme 5	High 9	Substantial 14	Medium 20
Possible	Extreme 3	High 7	Substantial 13	Medium 19	Low 23
Unlikely	High 6	Substantial 12	Medium 17	Low 21	Low 24
Very Unlikely	Substantial 11	Medium 16	Medium 18	Low 22	Low 25

Source: City of Norwood Payneham & St Peters Work Health & Safety Risk Management Aide Memoire

It is well established in the management of risk that where at all possible, the most appropriate response to an identified risk is to eliminate the risk. In this instance, elimination of the risk to the surrounding community is possible, by not constructing the helicopter landing facility. Alternative locations exist for the applicant to travel via helicopter, including the Adelaide Airport and the absence of a helipad on the approved building in no way impedes the proper and orderly use of the building for its intended commercial use as approved on 16 May 2017.

In the event that the Governor approves the helicopter landing facility, the Council should give careful consideration to implementing Section 69 of the *Development Act 1993* to order that the owner of the land not operate the facility. In this respect, Section 69 states the following:

*An authorised officer may make an emergency order under this section if the authorised officer is of the opinion that the order is necessary—*

- (a) because of a threat to safety arising out of the condition or use of a building or an excavation; or*
- (b) because of a threat to any State heritage place or local heritage place.*

*An emergency order may require the owner of any building or land to do any one or more of the following things:*

- (a) evacuate the building or land;*
- (b) not to conduct or not to allow the conduct of a specified activity or immediately terminate a specified activity;*
- (c) carry out building work or other work.*

### Noise and Vibration

The PER includes a report by Sonus Acoustic Engineers, which compares the predicted noise levels from helicopters using the proposed landing facility with existing background noise levels. Background noise levels were recorded in Bowen Street over a one week period, showing average background daytime noise levels of approximately 70dB(A). On three (3) occasions during the one week survey, there were unusual spikes in noise to a level to approximately 95-100dB(A). No explanation is given in the report as to what may have caused those peaks.

The report states that the predicted noise levels from the proposed helicopter types (Eurocopter AS350B2 and Bell 206 Jetranger) would be 87dB(A), measured at the closest residences. However, BlueSkyRotor.com, a website which quotes data from the manufacturers datasheets, lists the three helicopter models proposed for use as having 'noise at takeoff, limit' levels ranging from 92-94 dB(A).

During the public information session held at the Norwood Concert Hall on 18 February 2020, the author of the Sonus report, Mr Chris Turnbull, stated that the 95-100dB(A) peaks in background noise which were recorded in Bowen Street, were likely associated with a car driving past. The inference from this comment, was that the noise expected from the operation of the helicopter landing facility would be akin to that of a car driving along Bowen Street.

In this respect, it is understood, based on previous acoustic advice received by the Council, that a car driving past would typically generate noise in the order of 70dB(A). It is also understood that noise is measured on an exponential scale and that a level of 90dB(A) is four (4) times louder than 70dB(A). It therefore would appear misleading to suggest that noise from the operation of the helicopter landing facility would be akin to that of a car driving along a street.

It is respectfully suggested that the noise peaks measured in Bowen Street were more likely caused by a very loud and unusual occurrence, such as emergency vehicle sirens or a loud motorbike passing in close proximity to the measuring device. In any event, this type of noise would be very brief in comparison to the duration of noise caused by a helicopter landing, passengers boarding or alighting and then the helicopter taking off.

The resultant noise would be highly disruptive to the residential amenity of dwelling occupiers in the locality.

The Sonus report also addresses vibration and states that for vibration from a helicopter to impact on sensitive land uses in the vicinity of the proposed development, the vibration would need to travel down the proposed building structure and through the ground to residences. It concludes that ground vibration from helicopters at the development will be insignificant. The report does not, however, address the potential for vibration caused by rotor wake, which is understood to be a potential issue in close proximity to a helicopter landing facility.

### Air Emissions

The PER includes an Air Quality Impact Assessment by Air Quality Professionals. The assessment report concludes that the predicted concentrations of pollutants which are likely to result from the proposal at nearby sensitive receptors are all below the applicable design ground level criteria (DGLC) published in the South Australia Environment Protection (Air Quality) Policy 2016.

### Property Damage / Heritage Impact

The Aviation Specialist Advice Report includes a section titled 'The impacts of rotor blade downwash and rotor wake on building cladding' (page 18). However, this section does not make any assessment of the potential impacts on surrounding buildings. Rather, it appears to describe the calculations which have been used to design the helipad.

During the public information session held at the Norwood Concert Hall on 18 February 2020, the author of the Aviation Specialist Advice report, Mr Colin Weir, responded to a question regarding the potential for damage to surrounding buildings from rotor downwash and/or rotor wake, advising that there was no cause for concern because those forces only occur during a 'hover' which occurs directly over the landing pad.

This concern does not, in staff's opinion, appear to have been adequately addressed in the PER. Whilst it may be the case that the forces only occur during a 'hover', it seems possible that for one reason or another (such as a delay in readiness at the landing pad), a helicopter may be required to hover in a location other than directly above the landing pad. In those circumstances, there could be significant risk to nearby buildings, including State and Local Heritage Places located adjacent the subject land.

The PER includes Buttery Reserve as one of the potential emergency landing site options. It is understood that the purpose of identifying Buttery Reserve and numerous other open space areas in the surrounding area within the PER, is to demonstrate that there are various locations available for an emergency landing, should the need ever arise. The use of those open space areas does not form part of the proposal and it is understood that pursuant to relevant aviation law, no approval from a land owner is required for the pilot of an aircraft to land in the event of an emergency. Notwithstanding, the open space areas which have been identified as potential emergency landing sites do not appear to be appropriate. Using sites such as school ovals and public parks and reserves as emergency landing sites would put the users of those spaces at significant risk.

## **OPTIONS**

The Council can determine to provide or not provide comments on the development proposal. However, given the scale and intensity of the proposed development and the likely impacts to public safety, residential amenity, building damage and heritage detailed in the body of this report, it is recommended that the Council make a submission to DPTI and the Minister for Planning.

## **CONCLUSION**

The Public Environment Report does not adequately address concerns regarding risk to the public or property associated with the proposed helicopter landing facility. In particular, the Aviation Specialist Advice Report simply outlines the measures which are proposed to manage risk, rather than containing an overall evaluation of the resultant risk. This is not a sound approach to assessing risk.

Helicopter crashes do happen and when they do, it is most often associated with take-off or landing. Locating a helicopter landing facility in a significantly built-up urban environment results in an inherently high risk, due to the catastrophic nature of the consequences in the event of a crash occurring.

The PER also does not adequately address the potential for property damage to nearby buildings, with the Aviation Specialist Advice Report seeming to only address the design of the landing pad.

The Sonus acoustic concludes that the proposal will not impact on residential amenity, as "*the predicted maximum levels are regularly exceeded in the existing noise environment*". This statement is made based on a survey of background noise levels which revealed three peaks in a week, with no information being provided in respect to what caused those peaks or the duration of those peaks. It would be very surprising if those peaks were sustained for any length of time comparable to a helicopter landing and taking off.

Many of the impacts addressed in the PER are said to be acceptable due to the proposed infrequency of use. It is understood that there is an intention to attempt to ensure that the stated frequency will be adhered to by way of condition of approval. Based on the several legal authorities quoted in this report, such an assessment approach is fundamentally flawed and enforcement would be highly problematic.

## **COMMENTS**

Nil

## RECOMMENDATION

That pursuant to Section 46D(5)(a) of the *Development Act 1993* and Section 63E(b) of the *Development Regulations 2008*, the Council provides the following comments to the Minister for Planning, the Hon. Stephan Knoll MP and the Department of Planning, Transport and Infrastructure, in respect the Public Environment Report submitted by the Peregrine Corporation for a helicopter landing facility at 270 The Parade, Kensington:

1. The Council considers that the public safety risks associated with the development are manifestly unacceptable and have not been adequately addressed in any of the documentation which has been provided by the applicant or the Department of Planning, Transport and Infrastructure.
  2. The Council considers that the proposed helicopter landing facility will have a significant adverse impact on the amenity for residents living in the surrounding residential area, through noise from helicopters using the landing facility.
  3. The Council considers that any authorisation which attempts to limit the use of the helicopter landing facility to ten (10) days per year is problematic and an improper use of a planning condition, as it would seek to limit the use of a facility that is clearly designed for far more intense usage and avoids dealing with the fundamental question of whether the use is appropriate in the first instance.
  4. That a copy of the staff report be provided to the Minister for Planning, to be considered in his assessment of the proposed helicopter landing facility.
  5. In the event that the Governor approves the development, the Council advises that it will give consideration to issuing an order to the owner of the land pursuant to Section 69 of the *Development Act 1993*, to not operate the facility due to a risk to safety arising out of the use of the helicopter landing pad.
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At 8.11pm Mayor Bria sought leave of the meeting to make a personal explanation. Mayor Bria declared that he had a perceived conflict of interest as his daughter is a student and his wife is a Volunteer at Mary MacKillop College which is situated in close proximity to the proposed Peregrine development. In addition, he also referred to comments he was quoted as making in The Advertiser on 23 October 2018, voicing his strong opposition to the proposed helipad. As such, Mayor Bria left the Chamber after calling for the appointment of an Acting Mayor for this item.

Cr Moore returned to the meeting at 8.11pm.

### Appointment of Acting Mayor

*At 8.12pm Cr Mex moved:*

*That Cr John Minney be appointed Acting Mayor for this Item.*

*Seconded by Cr Dottore and carried unanimously.*

Mayor Bria left the meeting at 8.13pm.

Cr Minney assumed the Chair.

*Cr Whittington moved:*

*That pursuant to Section 46D(5)(a) of the Development Act 1993 and Section 63E(b) of the Development Regulations 2008, the Council provides the following comments to the Minister for Planning, the Hon. Stephan Knoll MP and the Department of Planning, Transport and Infrastructure, in respect the Public Environment Report submitted by the Peregrine Corporation for a helicopter landing facility at 270 The Parade, Kensington:*

- 1. The Council considers that the public safety risks associated with the development are manifestly unacceptable and have not been adequately addressed in any of the documentation which has been provided by the applicant or the Department of Planning, Transport and Infrastructure.*
- 2. The Council considers that the proposed helicopter landing facility will have a significant adverse impact on the amenity for residents living in the surrounding residential area, through noise from helicopters using the landing facility.*
- 3. The Council considers that any authorisation which attempts to limit the use of the helicopter landing facility to ten (10) days per year is problematic and an improper use of a planning condition, as it would seek to limit the use of a facility that is clearly designed for far more intense usage and avoids dealing with the fundamental question of whether the use is appropriate in the first instance.*
- 4. That a copy of the staff report be provided to the Minister for Planning, to be considered in his assessment of the proposed helicopter landing facility.*
- 5. In the event that the Governor approves the development, the Council advises that it will give consideration to issuing an order to the owner of the land pursuant to Section 69 of the Development Act 1993, to not operate the facility due to a risk to safety arising out of the use of the helicopter landing pad.*

*Seconded by Cr Mex and carried unanimously.*

Resumption of Chair

Mayor Bria returned to the meeting at 8.46pm and resumed the Chair.