



Email: norwoodresassoc@gmail.com
Website: www.norwoodresidentsassociation.com
Facebook: www.facebook.com/NRAso

Minister for Planning
c/- Robert Kleeman
Unit Manager Policy and Strategic Assessment
Planning & Land Use Services
Department of Planning, Transport and Infrastructure

Email: majordevadmin@sa.gov.au

Thursday, March 12, 2020

MAJOR DEVELOPMENT PROPOSAL Peregrine Mixed Use Major Development - Variation 2 Helicopter Landing Facility

Dear Mr Kleeman,

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,



Christine Francis
(NRA President)
0419 826 918



Tom Smith
(NRA Secretary)
0411 099 195

cc

Hon Steven Marshall, Premier
Hon Vickie Chapman, Deputy Premier
Hon Stephan Knoll, Minister for Planning
Mr James Stevens, Member for Sturt

City of Norwood, Payneham & St Peters
Mayor Robert Bria
Cr Christel Mex
Cr John Callisto