

Media release

Internet-based discussion group request ACC demystify complex building height restrictions

SENSATIONALADELAIDE, an eclectic mix of over 1400 people unified only by their interest in Adelaide's future, have come together to ask the Adelaide City Council's upcoming 2008 Development Plan Review to make public the upper limits on building heights across the city.

Currently height limits for tall structures are shrouded in mystery and are a large hurdle to potential developers. The only way a developer can find if their proposal will be passed by the air safety authorities is to go to the expense of design and complex formal application. Even then they only get a yes or no, not an actual distance above street level.

SENSATIONALADELAIDE seek the creation of a publication that potential developers, or any member of the public, can consult in the early stages of planning to easily ascertain the maximum height their structure can pierce. In this way those considering investing in Adelaide will have a barrier removed, encouraging further investment in our city.

SENSATIONALADELAIDE is not an industry lobby group or a political organization – it's not formalised or incorporated. The participants meet online in what is known as an Internet Forum or Bulletin Board (*sensational-adelaide.com.au*) where they discuss various subjects related to Adelaide and South Australian development; and beyond. The demographic is almost as wide ranging as the population. Including people aged from 16 to 60, school students to labourers to professionals, locals and ex-pats. Anyone can participate; even some city councillors and the Lord Mayor have dropped by.

The submission was created from the consensus of discussion of the forum and is to be presented to the Adelaide City Council's 2008 Development Plan Review on Monday, 3rd November 2008.

<http://sensational-adelaide.com.au/aboutus>

SENSATIONALADELAIDE

To The Chief Executive Officer
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To The Adelaide City Council,

We, the participants of [SENSATIONALADELAIDE](#), request this submission be considered in reference to the August 2008 Development Plan Review.

It is recommended that under Section 30 of the Development Plan, which targets height limitations across the ACC district, the following four actions be undertaken:

- 1. Determine absolute maximum building heights:** ACC to work with relevant government departments and authorities to clarify the PANS-OPS air safety height limitations across the entire ACC region, and make public such information
- 2. Identify several sites for taller buildings:** Identify and publicise policy zones, and several specific sites, permitting taller (possibly maximum height) architecturally inspiring buildings
- 3. Relax height limitation policy in other areas:** Revise the height limitations across other ACC policy zones (review current ideology, focus on transport orientated development)
- 4. Require air safety technology upgrades be implemented:** Require AAL to periodically upgrade technologies where such change allows for further building height

The above actions will aid long-term environmental, cultural & economic benefits.

The following submission is provided to clarify benefits, foster discussion, and help initiate the necessary investigative process. [SENSATIONALADELAIDE](#), which has participants from a broad range of backgrounds, welcomes the opportunity to discuss this proposal in more detail.

We look forward to continued collaboration with the ACC, and to an exciting tomorrow for the City of Adelaide and all of South Australia.

Regards,
[SENSATIONALADELAIDE](#)



SENSATIONALADELAIDE

Submission to the ACC 2008 Development Plan Review



Imagine a city skyline...

...that is distinctly Adelaide. A skyline that celebrates our new optimism and purpose. A skyline that signals Adelaide is embracing the future, yet cherishes the unique city we already are.

What might this skyline be like?

- Perhaps, there are several mixed income apartment towers, featuring a vibrant street-level atmosphere for the growing number of city residents. These homes also represent the best in green building - and people can't get enough of them. The city is enlivened by these vibrant new communities...
- Perhaps, there are a few imposing office towers, of bold design. They rise much taller than Westpac House - icons that let everyone know we are in business. Many who work in these impressive buildings simply walk to work, and don't own a car...
- And, perhaps, there are places where we choose to keep the skyline unchanged, because we love those parts of town just the way they are. The past and the future, side by side, each adding their unique style to the life of our city...

It's an exciting future to ponder, and it's within our grasp. Our city can have an energy that attracts young people from across the country, and a confidence that business is drawn towards. We can be a leading city for the 21st century, known for our commitment to building a sustainable, liveable future. In short, we can realise our great potential. However, this won't happen by accident. It requires careful planning, and that planning arises from accurate information.

The Adelaide City Council's visionary Creating our Future strategic plan lays the foundation for success. It is unfortunate, then, that Adelaide's building heights remain restricted by ambiguous and confusing air safety guidelines. This issue undermines our ability to make intelligent land use decisions. So, let's clear this uncertainty, once and for all. And then let's get on with creating our future.

SENSATIONALADELAIDE is pleased to offer the following submission on the Review of the Adelaide City Council Development Plan.

The benefits of taller buildings

It is encouraging that by simply aligning ACC Development Guidelines to aircraft limitations, a series of improved cultural, social and economic benefits will result, including:

1. Property developer confidence: Property developers will be able to put forward bolder plans with more certainty as to their approval.
2. Architectural innovation: Taller buildings enable the inclusion of innovative architectural facades and features. Complementing the oasis of city park lands, the addition of architecturally designed buildings will develop a skyline that is *distinctly Adelaide*.
3. Long-term industry growth: The trend of stable upward growth in the Adelaide office market will be firmly established. Corporations will be encouraged to set up headquarters and assume longer-term investment strategies.
4. Drive population growth: Our burgeoning mining and defence industries rely heavily upon increased migration. People will be more likely to make the move if SA is visibly seen to be moving forward – from a cultural and financial perspective. Choosing to move interstate or overseas is a huge emotional and financial step, and we must feed confidence into the migration decision making process.
5. Revitalise public transport: Increasing CBD density (residential and commercial) will grow public transport usage to, from and within the city. This will also decrease weekday reliance on private transportation.
6. Sustainable and affordable living: Several benefits arise from focusing on development opportunities within the Square Mile;
 - Lessening sprawl: Taller CBD commercial properties will reduce the need for outer suburban campus-style developments. This approach aligns with the SA Government’s plan for several Transport Oriented Developments (TODs) orbiting the Adelaide CBD.
 - Minimising carbon footprint: This is already a key ACC goal. Better architecture will realise further emission reductions.
 - Housing choice: It is clear that a generational change is underway. People are choosing higher density, near-city, café lifestyles. The ACC already has plans to provide more affordable housing within the Square Mile — taller buildings assist in this goal.

After 20 years of *skyline stagnation* in Adelaide, these benefits will help foster a sense of pride in South Australia. The results of a recent Advertiser poll were in favour of taller developments. It is intrinsically human to perceive tall structures as signs of success and confidence. For Adelaide to be regarded a peer to other Australian cities, we need a skyline that reflects our place in the World, while retaining an unique identity for Adelaide.

We must not underestimate the flow on effects that come from a positive outlook in the public’s morale due to the appearance of the city’s skyline — as well as those of investors interstate and overseas.

About Us

SENSATIONALADELAIDE is a not-for-profit web-based community group engaged in constructive debate regarding development and urban planning across Adelaide and South Australia. Starting from a small base three years ago, participants continue to join in. At last count, around 1400 participants from South Australia and beyond.

Our goal is to make South Australia a vibrant place to work, live, study and play. To learn more about our organisation, our vision and objectives, or to become a member please visit: www.sensational-adelaide.com/aboutus

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Demystifying PANS-OPS and OLS limitations

It is understood by SENSATIONALADELAIDE that air safety concerns are not a limiting factor for current CBD building height restrictions.

Our research is based on discussion with ACC and AAL staff based around the AAL master plan (aal.com.au/pdfs/AAL_Master_Plan_04_App.pdf).

Aircraft safety clearance: The PANS-OPS (Procedures for Air Navigation Services - Aircraft Operations) and OLS (Obstacle Limitation Surface) limitations are imaginary surfaces which determine the safe clearance below aircraft flight paths.

- SENSATIONALADELAIDE has found the ACC's current Development Guidelines to be significantly below the PANS-OPS ceiling and in fact below the lower OLS in many policy areas (Appendix A depicts the current situation).

PANS-OPS information is complex: The AAL's pictorial PANS-OPS information appears complex and its implications on building height is far from clear, lacking firm geographic reference points.

- SENSATIONALADELAIDE understands that this diagram was included in the AAL master plan as a bureaucratic requirement alone, as it is no use as a planning resource (Reproduced in Appendix B).

The above points of confusion are readily resolvable given patience and a collaborative approach by all parties. Only once the PANS-OPS matter is resolved completely can the ACC make logical decisions on the revision of its own development guidelines.

Domestic and international comparisons

SENSATIONALADELAIDE has identified several cities similar to Adelaide (population, density, airport proximity) with existing taller skylines.

We have also researched past and present building height initiatives of relevance:

Domestic comparisons

Two examples are provided to clearly indicate what is possible, and an approach that has worked recently elsewhere in Australia:

- **Adelaide Capital City Observation Tower:** This project, shelved in 1998 due to the Asian stock market collapse, is tangible evidence that taller construction is permissible. Huge levels of public support existed for this 200m tower, and should again encourage the ACC to act. If proposed again today there should be no reason why it could not be constructed.
- **Brisbane, Australia:** In 2007 the Brisbane City Council abolished height limits across large areas of the CBD, with a focus on creating high-quality pedestrian experiences, promoting excellence in building design and providing high-density living. To abolish height limits, the Council took an *open-sky* stance and subsequently engaged with Brisbane Airport and associated agencies to meet with air traffic safety requirements.

International

Adelaide airport is 5.39km distant from the CBD, with runway alignment being approx 22 degrees divergent from the CBD (reference point is Westpac House). **SENSATIONALADELAIDE** has found the following cities who have lesser building restrictions and closer airports:

- **Phoenix, Arizona:** This airport is located 4.3km from the Phoenix CBD with runway alignment of approximately 20 degrees. The tallest building is Chase Tower (147m) which is 12m taller than Westpac House.
- **Herndon, Florida:** This airport is located 3.8km from the Herndon CBD with runway alignment of 15 degrees. The tallest building is SunTrust Center (135m) matching Adelaide's Westpac house.

These examples should encourage the ACC to call for more height in Adelaide. The simple airport to CBD distance comparisons indicate that Adelaide could easily have building heights of 200 or more metres without breaching air safety limits (Refer to Appendix E).

Narrative of investigations

This section contains a narrative of recent investigations into PANS-OPS and building heights by several **SENSATIONALADELAIDE** participants. It clearly demonstrates the confusion and difficulty that industry confronts.

"I recently spent a few weeks endeavouring to get clarity around the PANS-OPS limitations. My goal was to determine the PANS-OPS height at each major city intersection. It was a painful experience involving many phone calls and emails to AAL, DOTARS, CASA, and the ACC. I spoke with Senior Directors, Engineers, Bureaucrats, and Council staff.

Most encouragingly, the people I spoke with at the ACC would love this information to be clarified and made public (as they can see the tremendous value it would bring), but AAL, DOTARS, CASA, etc. are simply not interested or are perhaps insufficiently motivated?

The only time everyone works together is when a developer owns land, has spent money on an architecturally designed building, formally sought approval to build it, and is willing to pay for a single data point of PANS-OPS information. Even then I don't believe they actually get to see the information, instead receiving a yes or no response."

"All we can decipher is a sizable portion of the CBD is covered under a 200AHD zone, but again that is subject to variability in terrain and approach path as it heads NE. From observations and calculations, the maximum building height above street level achievable that adheres to this absolute limitation is ~160m located in the absolute NE corner of the CBD. That does not take into account the variability of the flight path over distance. The Capital City Observation Tower project which was 200m tall above street level and was approved for construction is a fact which contradicts my existing hypothesis. This only adds to the confusion over this issue."

Toward a new skyline, and Transport Oriented Developments

Construction in Adelaide has been governed by the ideology of a pyramid shape for the skyline.

Until the State Bank building was erected in 1988, this concept attributed to creating an identity for our city.

More recently, the pyramid principle has been skewed with an imbalance across the King William Street axis. To the east lies more density, to the west greater height, soon to become further pronounced with the 20-22 Currie Street and Spire Living buildings.

Is it interesting to note that while taller buildings are being established in the west, true scope for taller buildings sits in the east. As this area is further from the airport and hence less impacted by aviation constraints.

It is unclear whether the ACC still holds to the pyramid view, but the latest building height diagram (refer to Appendix D) portrays this stance.

- **SENSATIONALADELAIDE** requests the ACC discount the pyramid ideology and revise upwards building height guidelines in the PA-14, PA-15 and PA-16 policy areas.
- **SENSATIONALADELAIDE** requests the ACC relax building height restrictions in other CBD areas, creating Transport Oriented Development areas (TODs). In particular we recommend PA-17 and PA-21 (Victoria Square and Light Square, Hindmarsh Square) have their building heights substantially lifted.
- **SENSATIONALADELAIDE** recognises that there are other places where we should not raise building heights. As an example, the character and low-density atmosphere of the South-East and South-West regions should be retained

Moving towards more dispersed CBD height, coupled with a clustered TOD approach will better align with the ACC's contemporary environmental, cultural and other far-sighted goals.

Suggested steps to achieve

SENSATIONALADELAIDE recommends the following general approach:

1. ACC to encourage State Government bipartisan support in demystifying air safety limitations.
2. ACC to encourage all ACC Councillors to publicly champion this cause.
3. ACC to obtain further industry input and partner with key players to build a compelling argument for change.
4. ACC to seek consultation and work with Civil Aviation Safety Authority (CASA), Adelaide Airport Limited (AAL), Air Services Australia (ASA), and the Department of Transport and Regional Services (DOTARS) to clarify and make publicly accessible PANS-OPS descriptions and diagrams.
5. ACC, in conjunction with the SA Government, to require the AAL master plan to be updated and maintained using intuitive terms and diagrams.
6. ACC, in conjunction with the SA Government, to require AAL to regularly upgrade technologies (e.g. radar systems) where such change allows for increased building heights, and further removes bureaucracy from the development assessment process
7. ACC to revise development guidelines to include three to five policy area zones that permit maximum height architecturally aesthetic buildings (e.g. PA-14, PA-15, PA-16). Also identify and reserve several CBD addresses as firm candidates for buildings of architectural significance — structures that have the potential to become Adelaide icons.
8. ACC to relax height limitation policy in other policy zone areas, moving away from the pyramid notion. In particular, focus on the creation of high-rise TOD-style development nearby Adelaide's squares.
9. ACC to create and publicly maintain a three dimensional model showing the PANS-OPS, OLS and ACC Development Guidelines surfaces overlaid on the Adelaide Council Area.

A Council with vision

At this time we wish to again applaud the ACC's vision towards 2030, and its recent performance assessing and approving over \$1b worth of development with a 98% approval rate.

While losing ultimate approval powers to the State Government's Development Assessment Commission (DAC), the ACC's continued expert input is imperative for the creation of a vibrant city, and promotion of Adelaide as a destination for long-term social and business investment.

We would also like to commend the ACC on the award it received from the Planning Institute of Australia last year regarding the airport and building heights work for the Currie St *Permanent Wave* building. The lessons learned and contacts gained from that exercise will obviously be of benefit for this proposal.

References from within the ACC

This section contains information gathered by SENSATIONALADELAIDE direct from ACC councillors and employees.

The intent is to show that latent support for this proposal already exists, and that formal action will be met with widespread enthusiasm.

Conversations with ACC Staff: SENSATIONALADELAIDE participants have spoken with key ACC personnel and were advised that approval for taller buildings east of Westpac House would most likely be granted by all necessary bodies — but only if a developer came forward with advanced plans.

- SENSATIONALADELAIDE participants believe this ad hoc approach to be counter-intuitive. It places undue time, cost and reputation risk on property developers.
- SENSATIONALADELAIDE have found that ACC officers believe that there is insufficient information available to the general public on the maximum theoretical building heights, but cite problems with getting clear information from AAL, CASA, DOTARS, et al.

Extract from Councillor Newsletter: *“The Millennium Development Goals (MDGs) are 8 goals to be achieved by 2015 that respond to the world’s main development challenges. The Millennium Goals may not appear to have much relevance to the Adelaide City Council but certainly some of our programs... and our response to the threats of Climate Change will directly contribute to ensuring environmental sustainability (Goal 7)...”*

- SENSATIONALADELAIDE research shows that improved sustainability, already receiving focus from the ACC, is one of the key outcomes from a taller skyline

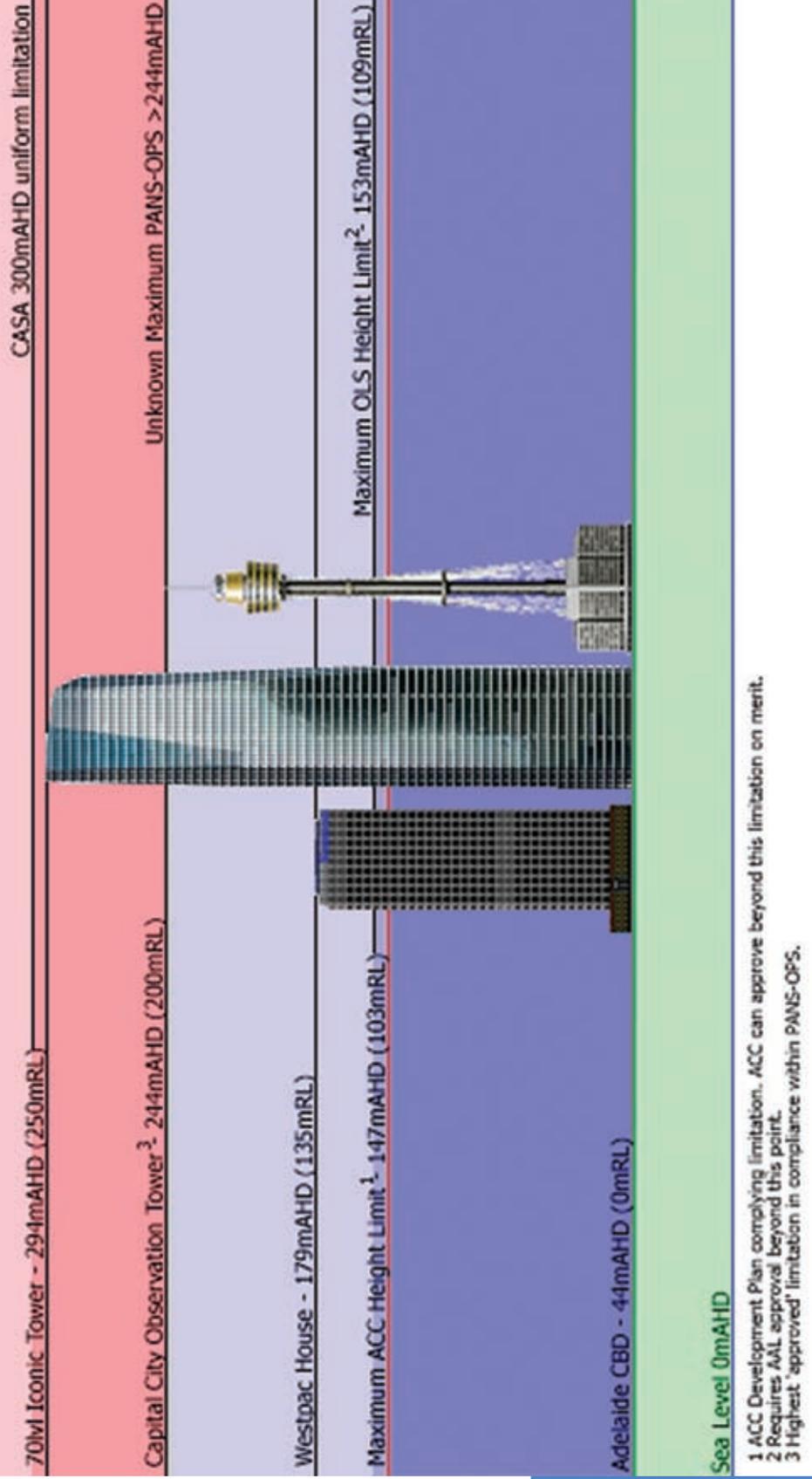
Extract from Councillor Newsletter: *“The city itself with its own ambitious target to increase its population to 45000 will, in effect be the ‘Mother of all TODs’ being close to all facilities, at the hub of all metro transport systems and being far and away the most carbon-efficient place to live in the State.”*

- SENSATIONALADELAIDE agrees with the stance by this Councillor. We recommend ACC further investigate having multiple high-rise TODs focused around the 5 squares

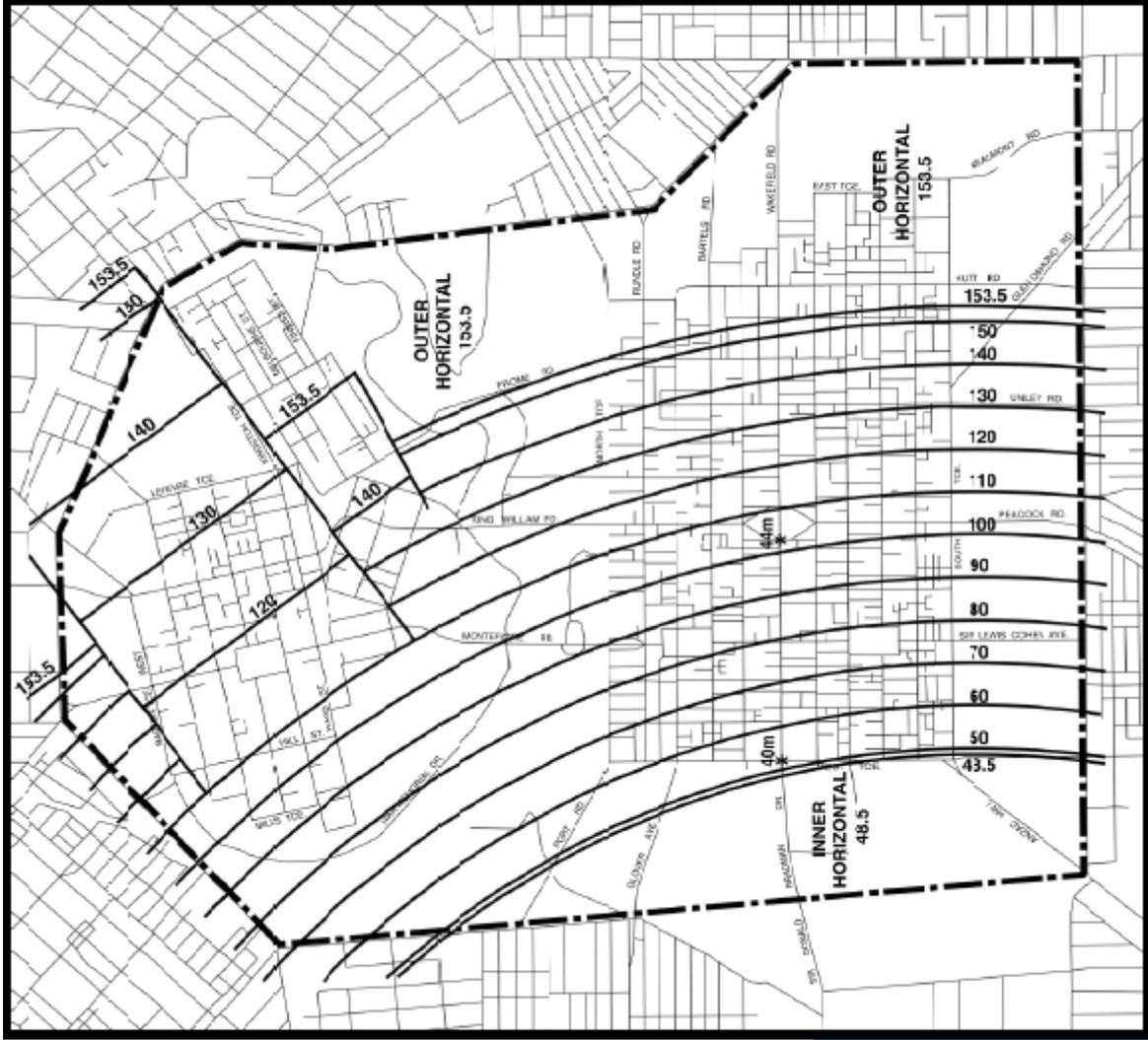
Extract from Councillor Newsletter: *“The masterpiece of (Adelaide) city-planning is a benefit but it has also been a challenge for subsequent planners and developers of the city. If we are to preserve the historic character and the human scale which sets Adelaide apart ‘we are going to have to go higher in carefully chosen places’. At a recent discussion around the Council table it was suggested that we need an iconic tall building - perhaps 80 storeys - Personally I have no problem with tall buildings provided they are well-designed, relate well to their neighbours and present a pleasant environment at street level.”*

- SENSATIONALADELAIDE agrees that retained or enhanced street level intimacy must go hand-in-hand with taller buildings. Again we are delighted to see such levels of insight from within the ACC

SENSATIONAL ADELAIDE

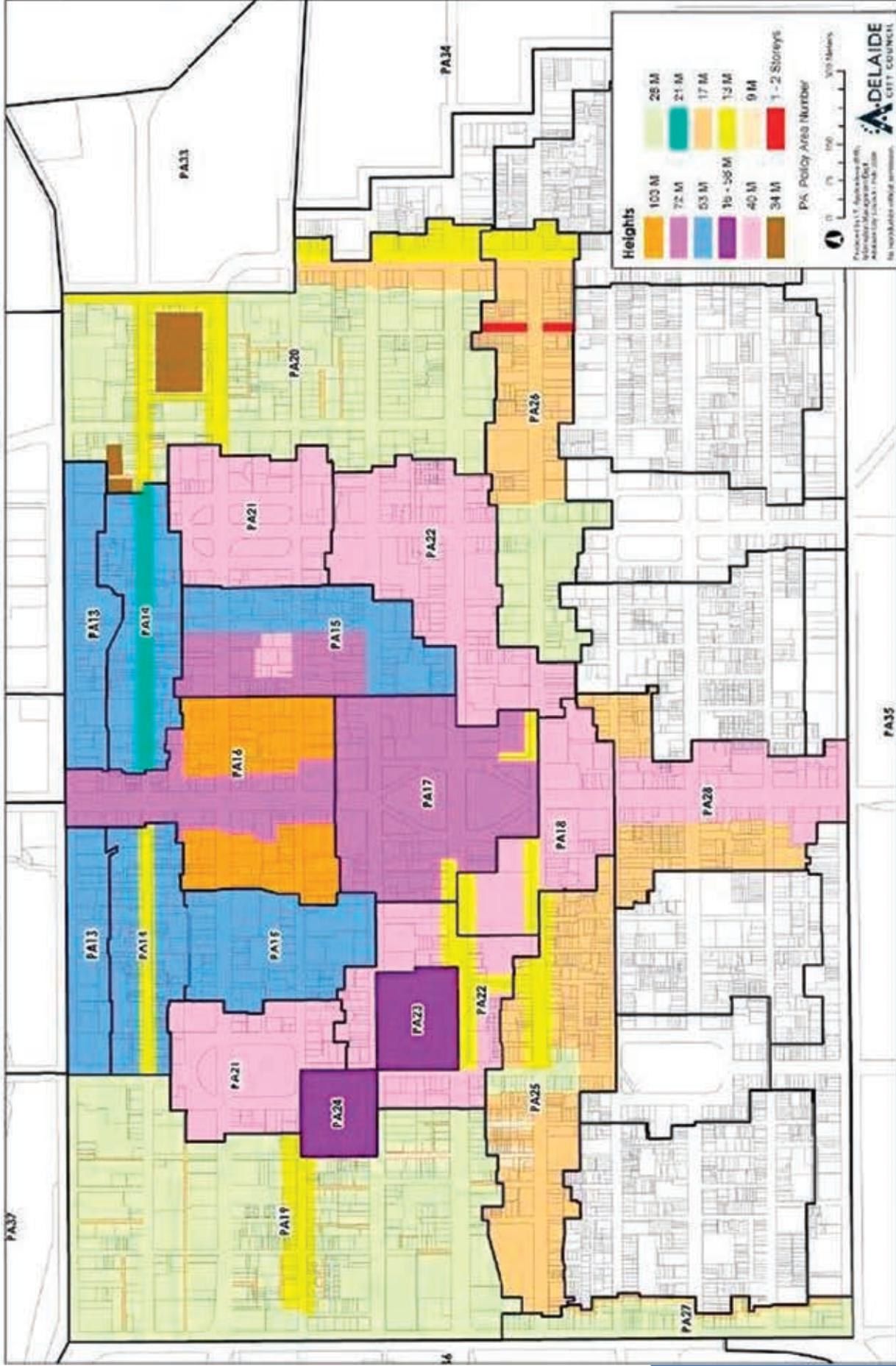


Appendix A : Depiction of PANS-OPS, OLS & ACC Limitations
 Pictorial representation of height limitations. Shows height of previously approved Capital City Observation Tower, and a theoretical 70m iconic tower.

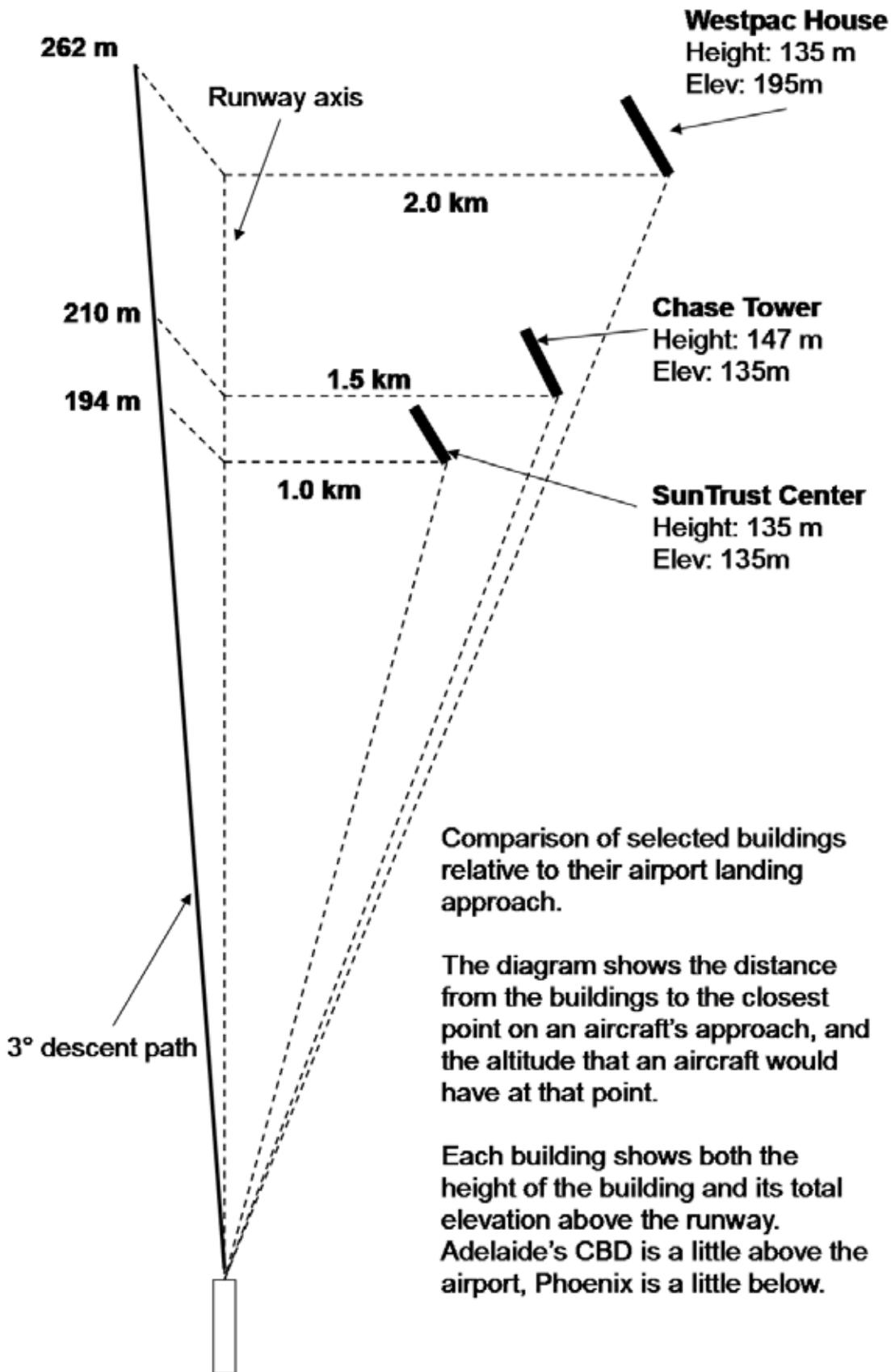


Appendix C : Current OLS Diagram
 The current OLS diagram (extract from AAL Master Plan
 (http://aal.com.au/pdfs/AAL_Master_Plan_04_App.pdf))

NEW Development Plan Allowable Building Heights Jan 2006



Appendix D : Current ACC Building Height Limitations
The 2006 version of the ACC building height guidelines map.



Comparison of selected buildings relative to their airport landing approach.

The diagram shows the distance from the buildings to the closest point on an aircraft's approach, and the altitude that an aircraft would have at that point.

Each building shows both the height of the building and its total elevation above the runway. Adelaide's CBD is a little above the airport, Phoenix is a little below.

Appendix E : Comparison of tall structures in relation to the runways that they are near.
 Westpac House, Adelaide SA; Chase Tower, Phoenix AZ; Sun Trust Centre, Haddon FL

**This document was prepared by participants of
Sensational-Adelaide.com.au**

<http://sensational-adelaide.com.au/aboutus>

**We welcome questions and will willingly
provide more details as required.**