

# Details of Representations

## Application Summary

Application ID	24042402
Proposal	14 level residential flat building containing 36 dwellings, all of which are to be offered as affordable housing (social housing)
Location	8 HOCKING PL ADELAIDE SA 5000

## Representations

### Representor 1 - Michelle Robinson

Name	Michelle Robinson
Address	22/50 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	06/04/2025 10:17 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

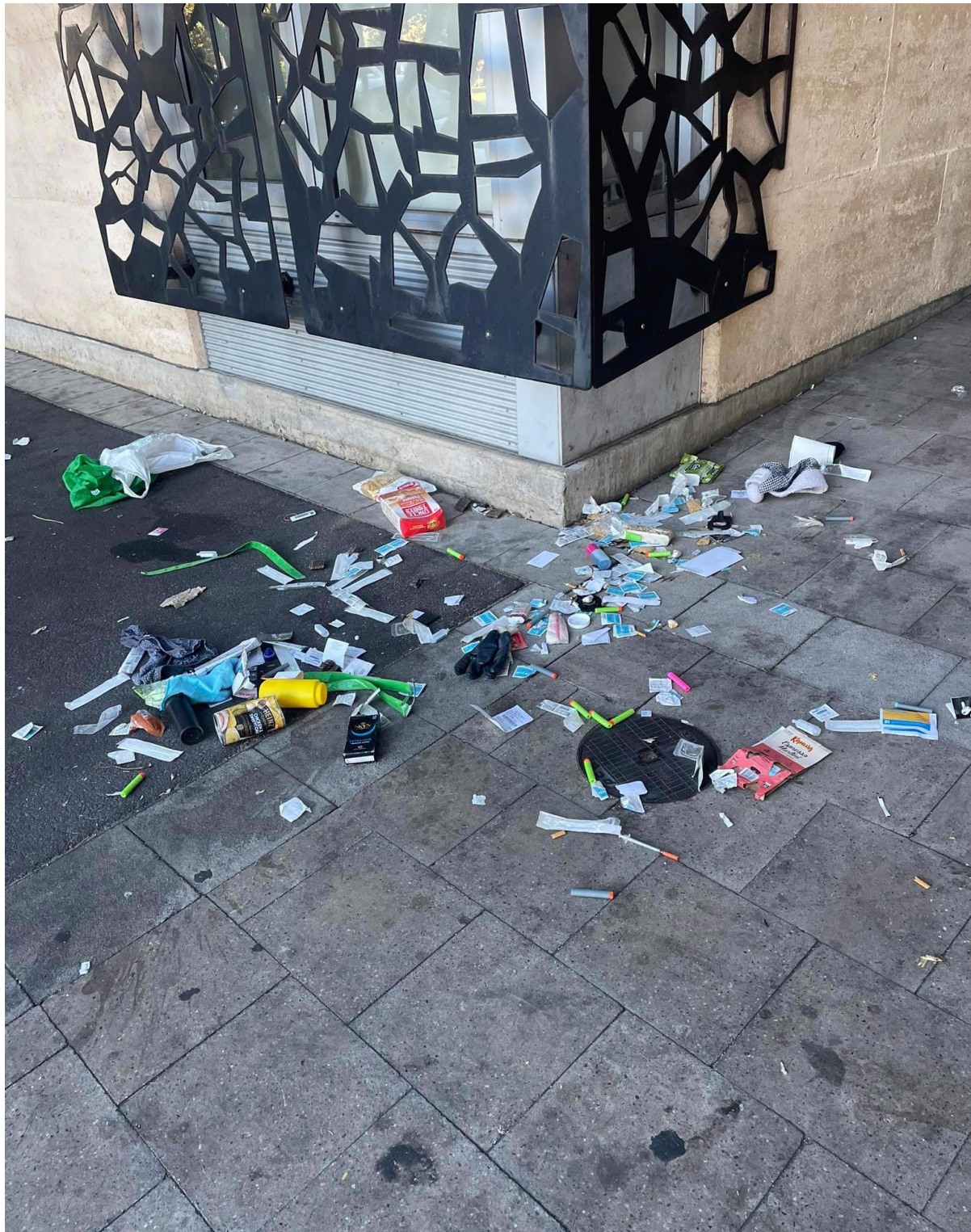
**Reasons**

I would like to support the development if Adelaide City Council were able to make headway into the public health and safety concerns of the south-east corner of Whitmore Square. Unfortunately, even after having a meeting with residents and business owners, there has been no headway. I live in 42-56 Whitmore Square and years of neglect by the Council to keep this part of the city safe has failed. " 4.1.2 Locality the congregation of social housing along and within the vicinity of Hocking Place contributes to the overall social fabric of the locality. Whitmore Square has a significant influence on the local character and amenity providing highquality open space that is accessible to the general public and supporting various passiverecreation activities and natural landscape amenity; " I am unsure what the developers understand about the social fabric of Whitmore Square and Hocking Place. On any given night, Hocking Place is filled with people who have substance abuse. 42-56 Whitmore Square where the path is private property is constantly blocked by either substance abusers or the homeless. We have to call the police constantly for assistance. Whilst having affordable housing is important, making the entire building social housing will not enhance the social fabric of this corner of Whitmore Square. The Planning Commisssion should consider it a mix of social housing and units for people to purchase under Home Seeker or affordable housing that can be purchased for owner-occupation. The noise level in this corner of the quiet square after 6pm is out of control. The rates we pay as residents make it very hard when we have to deal with a situation that was ignored by the ACC for many years. I cannot support this development because of the current issues that residents encounter and it will make the situation at Hocking Place and 42-56 Whitmore Square worse. More consideration should be given to mix up the type of home available. I write this as a person who is unable to leave my home after dark due to the safety issues we have in this area, which include people with substance abuse, theft, fights, stolen mail and syringes.

## Attached Documents

IMG_1651-1489535.jpeg
IMG_1650-1489536.jpeg













# Representations

## Representor 2 - Peter Tonkin

Name	Peter Tonkin
Address	24/22 Macpherson Street OCONNOR ACT, 2602 Australia
Submission Date	06/04/2025 12:42 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

**Reasons**  
As a former resident of the nearby Whitmore Square apartments (and now landlord), you would look out of the kitchen window directly at this apartment building. It would cut natural light and completely block the view. Additionally I am concerned about a further concentration of social housing in an area that already has a lot, because this concentration could exacerbate an exiting issue of social problems around the square.

## Attached Documents

# Representations

**Representor 3** - Chelsea Martin

Name	Chelsea Martin
Address	10/44 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	30/03/2025 11:05 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

**Reasons**  
City of Adelaide and the state government have repeatedly failed to address the issues and anti-social behaviours already occurring in our section of the city. We have a prime example of 100% social housing just down the road on Sturt street, now a condemned building following years of violence, substance abuse and multiple murders. Putting more housing and no services into a square that is already under pressure is simply ludicrous. Projects that offer housing for people during a housing crisis are important, but surely cannot be considered until the City of Adelaide and State Gov actually deal with the of substance abuse and violence in the square.

## Attached Documents



# Representations

## Representor 4 - Robert Naudi

Name	Robert Naudi
Address	PO Box 10071, ADELAIDE BC ADELAIDE SA, 5000 Australia
Submission Date	31/03/2025 02:31 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
<b>Reasons</b> The proposal is far in excess of current building heights. I have no issue with a development but its height in this part of the city should be restricted to the existing structures nearby.	

## Attached Documents

## Representations

### Representor 5 - Varda Svigos

Name	Varda Svigos
Address	11 St Lukes Place ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 12:03 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> The local community is over burdened with drugs, violence alcohol abuse aboriginal crisis and unmanaged social safety. It is currently being discussed with the council and having an additional burden on the community is not going to help the current situation.	

### Attached Documents

Representations

Representor 6 - Nic Klar

Name	Nic Klar
Address	21 Chatham St ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 12:25 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I support the development
Reasons	

Attached Documents



# Representations

**Representor 7** - William Matthews

Name	William Matthews
Address	223 pulteney street ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 01:59 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

**Reasons**  
I’m somewhat concerned that this type of housing will bring more drugs crime and trouble to Whitmore Square. Whitmore Square feels very dangerous and scary to be around that area and the city needs to become nicer. Not more scary. It feels like the inner City of. Adelaide is becoming very rough and dangerous And people will be scared to live in the city if it keeps attracting druggies people drinking disorderly people and dangerous people. City needs to be greener cleaner nicer and friendly for the City to grow and be considered a beautiful city and not inner city ghetto like is what happening in some American cities we need a lead to be a nice in a city that is green clean friendly and classy

## Attached Documents

## Representations

### Representor 8 - Sandra Noke

Name	Sandra Noke
Address	26/56 Whitmore Square Adelaide SA 5000 ADELAIDE SA, 5000 Australia
Submission Date	09/04/2025 03:20 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
<b>Reasons</b> Please see attachment Development Representation -24042402 - Sandra Noke.pdf	

### Attached Documents

Development-Representation-24042402-Sandra-Noke-1490669.pdf

Name: Sandra Noke

Address 26/56 Whitmore Square, Adelaide, South Australia

I am writing a representation to oppose the proposed development at 8 Hocking place (Application 24042402), based on concerns and impacts to my property and family's wellbeing.

### **1. Inadequate Bicycle Parking and Increased Pressure on Car Parking Infrastructure**

The proposed development will significantly increase demand for car parking, with approximately 50 (or more) new residents and only six bicycle parking spaces provided. According to the CIRQA traffic and parking report, this is well below the 45 bicycle spaces required under the DTS/DPT criteria.

Parking on and around Whitmore Square is already near capacity. The limited available parking currently supports Café Troppo customers as well as visitors to residences at 42–56 Whitmore Square. A reduction in available parking will directly impact Café Troppo's business and restrict access for residents' visitors.

### **2. Negative Impact on Local Economy and Community Vitality**

Café Troppo is more than just a local business—it is a vibrant community hub that fosters connection and contributes to the social fabric of Whitmore Square. By drawing a steady crowd of families, workers, and culture-seekers, the café helps deter antisocial behaviour in the area. Its ongoing success relies on accessible parking for customers.

### **3. Loss of Passive Ventilation: Impacts on Sustainable Design**

I own and live in an apartment in the Troppo Eco Housing development, which was previously owned by Adelaide City Council. This building was designed with sustainability in mind and utilises passive cooling by taking advantage of Adelaide's prevailing southerly winds. The design is so efficient that we rarely need to use air conditioning—cool air flows in through the kitchen, naturally ventilating our apartment. The development is known as the 'Eco Housing Project,' and its sustainable features are central to its character, reputation, and value.

The proposed 14-storey development will be positioned directly upwind of Troppo Eco Housing, creating an asymmetrical canyon between the two buildings, with a separation of only around 2.5 metres, and a ten-storey height differential (refer to the diagram on page 50 of Psi-8HockingPlace-10730683.pdf).



Research shows<sup>1</sup> that when a taller building is positioned upwind of a shorter one in close proximity, it creates a canyon effect that results in higher ambient temperatures and a build-up of polluted air. Heat absorbed by the taller building's thermal mass will radiate into the canyon space. This heating effect will be compounded by the proposed building's large, north-facing concrete side, which will be fully exposed to solar radiation year-round. In addition, heat and pollutants from everyday activities such as cooking, smoking, and showering will vent into the same confined space. This will significantly compromise the passive cooling functionality of my apartment. Instead of drawing in fresh, cool air, our windows may draw in stagnant, warm, and polluted air.

#### **4. Inconsistency with Council's Strategic Vision for Environmental Sustainability**

I am not opposed to increased housing density, nor to a taller building. A more moderate height of 6–7 storeys would create less asymmetry between buildings, reduce the potential for air stagnation, and result in a smaller north-facing surface area exposed to solar radiation.

I also fully support the need for affordable housing. However, I do not believe that the current proposal aligns with the Adelaide City Council's Strategic Vision 2024–2028.

This development, if approved in its current form, will lead to the following outcomes:

- Many of the current Troppo Eco Housing apartments will become significantly less sustainable.
- The passive cooling design, once championed by the Council, will be undermined.
- The project contradicts the Council's stated goals around environmental responsibility and climate resilience.

#### **5. Lack of Active Frontage and Poor Integration with the Streetscape**

I do not believe that this development is “bold, interesting, and purposeful.” There is no provision for ground-floor retail or quality community space that could act as a buffer between the socially and economically disadvantaged future residents of 8 Hocking Place and the street-level criminals who prey on vulnerable people.

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<sup>1</sup> Zhengtong Li, Hao Zhang, Chih-Yung Wen, An-Shik Yang, Yu-Hsuan Juan, Effects of height-asymmetric street canyon configurations on outdoor air temperature and air quality, Building and Environment, Volume 183, 2020, 107195, ISSN 0360-1323, <https://doi.org/10.1016/j.buildenv.2020.107195>.

## **6. Community Safety and Public Health Risks**

Due to my close proximity to Hocking Place and my clear vantage point over Evans Place, I am acutely aware of the safety issues faced by both residents in the area. I frequently witness drug deals and intravenous drug use in Hocking Place and Evans Place.

While I strongly support the need for social housing, placing vulnerable people in an area already affected by significant drug and alcohol-related activity is not a responsible or supportive solution.

# Representations

## Representor 9 - David Garland

Name	David Garland
Address	1905/156 Wright Street ADELAIDE SA, 5000 Australia
Submission Date	10/04/2025 12:24 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

As a local resident, I wish to object to the proposed development at 8 Hocking Place: a 14-storey, 46.3m-high social housing tower adjacent to Whitmore Square. I strongly support the provision of social and affordable housing in our city. However, this proposal delivers that aim in a way that raises serious concerns about scale, density, design, and long-term impact on the community and surrounding amenity.

1. Significant Breach of Height Limit The site is zoned with a 29m building height limit. The proposed 46.3m tower exceeds this by over 60%—a major departure from planning controls. This is not a marginal design adjustment; it's a fundamental challenge to the intent of the zoning. If approved, it risks opening the door to further height creep in a precinct that was not designed to accommodate high-rise development.

2. No On-Site Parking at All The development includes zero parking—not for residents, visitors, deliveries, or support staff. While this may technically comply with policy, it is practically unsustainable. Whitmore Square is already under pressure from mixed residential and recreational use. This proposal will shift that pressure onto neighbouring streets, public green space, and local infrastructure—without offering any mitigation.

3. Extreme Density on a Tiny Site The proposal seeks to construct a 14-storey tower with 36 apartments on a 250m<sup>2</sup> site—an extremely small footprint. This equates to more than 140 dwellings per 1,000m<sup>2</sup>, with minimal open space, no setback buffers, and no meaningful communal or green areas. The sheer intensity of this build, on such a constrained lot, raises legitimate questions about amenity, access, airflow, natural light, and long-term livability for residents.

4. Incompatible with Local Character and Setting This site is directly adjacent to local and state heritage places and fronts one of Adelaide's most valued public squares. The proposal's bulk and height will dominate the streetscape, clash with the low- to mid-rise rhythm of surrounding buildings, and negatively affect the open, community-focused feel of Whitmore Square. The City Plan's call for "designing for urban life, diversity, and density" encourages integration—not imposition.

5. Out of Step with Adelaide's Strategic Vision The City Plan – Adelaide 2036 outlines a vision of sustainable, community-minded development. This project falls short on multiple fronts:

- No green infrastructure or urban cooling contribution
- No usable communal or public space
- No practical integration with transport or active travel networks
- Increased vertical hard surface in an already heat-vulnerable area

These failings are not aligned with the Plan's principles of livability, sustainability, and neighbourhood identity.

**Conclusion** This development, while commendable in its intention to house vulnerable people, fails to deliver that outcome in a way that is respectful to its location, surrounding community, or broader planning objectives. I respectfully request that this application be refused or significantly redesigned to:

- Comply with the 29m height limit
- Offer a more appropriate density for the site's scale
- Provide parking and amenity that meet basic needs
- And reflect the shared vision for Adelaide's future as a livable, human-scale, and equitable city.

## Attached Documents



## Representations

### Representor 10 - Fletcher O'Leary

Name	Fletcher O'Leary
Address	15/50 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	10/04/2025 02:07 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I support the development with some concerns

#### Reasons

Overall, I support the development. There are some ways that it might be improved. Firstly, I would only support such dense housing with a guarantee that it remains social / affordable housing. I think it's a good thing for more affordable housing to be provided within the CBD and surrounding areas, as there is a tendency to push social housing tenants out of central or more desirable areas. That being said, the local social environment is influenced by the presence of the Sobering Up Unit and needle exchange managed in the adjacent building. This has meant that there are regular experiences of anti-social behaviour in and around Hocking Place. This may mean additional considerations need to be given to the supports available to tenants and careful consideration of how increasing population density can be used to positively influence the surrounding area. In terms of the design itself, I would be a little worried about the heat absorbed and reflected from such a large building onto adjacent buildings in the summer -- so ensuring the building incorporates designs to keep cool or not retain / radiate heat are going to be valuable for the area. As mentioned above, there is anti-social behaviour in the adjacent spaces, particularly at night -- so strategies to use the ground floor for a period after hours might be useful. For example, if the proposed consult rooms are usable as a community space, it will encourage ongoing use of the space and overcome the existing situation where this is an unused and unmonitored place. The eco-village on Sturt St doesn't have car parks, but there are bookable flexi-cars parked outside. I think a similar thing should be available for this property, in keeping with the sustainable living ethos. This might also encourage less parking on-street.

### Attached Documents

Representations

Representor 11 - Luke Saturno

Name	Luke Saturno
Address	88 GILBERT STREET ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 11:51 AM
Submission Source	Email
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
<b>Reasons</b> See email	

Attached Documents

8HockingPlaceAdelaide-10898276.pdf
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## Lewis, Tegan (DHUD)

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**From:** Luke Saturno <luke@gilbertsthotel.com.au>  
**Sent:** Friday, 11 April 2025 11:23 AM  
**To:** DHUD:SPC Applications  
**Cc:** Luke Saturno  
**Subject:** Application ID: 24042402 Proposed Development:

You don't often get email from luke@gilbertsthotel.com.au. [Learn why this is important](#)

Hi there,

I will like to be heard regarding this development.

Application ID: 24042402 Proposed Development: 14 level residential flat building containing 36 dwellings, all of which are to be offered as affordable housing (social housing) Notified Elements: Residential flat building  
Subject Land: 8 HOCKING PL ADELAIDE SA 5000

- 
- luke saturno from Gilbert Street Hotel 88 gilbert street Adelaide,

### **I do not support the purpose of this proposed development.**

I have owned and worked in this area for over 15 years, and I have witnessed a steady decline in the condition of this part of town. In my view, this deterioration is largely due to the increasing concentration of social housing, shelters, the Salvation Army sobering unit, and now the newly added needle dispensary unit. I believe this development will only add to the existing problems and challenges already impacting the area and Whitmore Square. I have spoken with both current and former owners of pubs, hotels, and other hospitality venues in the vicinity, and many have cited the presence of social housing and associated services in and around Whitmore Square as key factors in the decline of their businesses.

I am in direct contact with the owner and manager of Mismatch on Whitmore, who have decided to relocate solely due to the daily issues they face, which stem from the activities in the square and the individuals it attracts. Introducing more social or community housing in the area will only worsen these challenges. Furthermore, the nearby hotel has been forced to hire 24-hour security whenever it is open—another clear sign of the increasing safety concerns in the area.

There are currently more than three housing commission properties located within just 300 square metres of my business—on Sturt Street, Russell Street, wright and Norman Street. One of these directly borders my premises. The ongoing issues stemming from these facilities have had a significant and deeply negative impact on my business, my staff, and our customers.

On a regular basis, we deal with incidents including theft, car break-ins, break-ins at the hotel, verbal abuse, physical intimidation, and the harassment of both staff and patrons. These are not isolated events—they are consistent, disruptive, and damaging to the day-to-day running of a small business. Many of my employees no longer feel safe coming to or leaving work, especially outside of daylight hours.

Customers have expressed concern, and some have even stopped visiting altogether due to the ongoing disturbances in the area.

Introducing yet another development of this kind in such close proximity would only escalate these existing problems. As a long-standing business owner in the area, I am already struggling to maintain a safe and welcoming environment. If conditions continue to decline, I will be forced to seriously consider whether continuing to operate in this location is viable.

This is not just about inconvenience—it's about safety, sustainability, and the survival of small businesses in an increasingly difficult environment.

The Central Market is one of the state's most popular tourist attractions. However, the increasing issues related to homelessness and public disturbances along Gouger Street have become a significant concern. Introducing additional council or community housing in the immediate area may unintentionally exacerbate these challenges, potentially impacting both local businesses and the visitor experience.

Regards,

LUKE SATURNO | General Manager

**THE  
GILBERT STREET  
HOTEL**

**P: 08 8231 9909**

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**88 GILBERT ST ADELAIDE SA 5000**

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Representations

Representor 12 - Michalis Philippou

Name	Michalis Philippou
Address	65 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 12:00 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

**Reasons**  
The location is overloaded with social crisis issues such as drugs, alcohol violence under resource policing the Salvation Army detox issues and current strategies not yet implemented by the council to create a safe environment is not going to help by putting 14 stories of social housing on top of the other problems that are already overburdening the Community.

Attached Documents

Representations

Representor 13 - dana kinter

Name	dana kinter
Address	dana@danakinterart.com ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 04:43 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons	

Attached Documents

## Representations

### Representor 14 - Alexander Bath

Name	Alexander Bath
Address	156 Sturt Street ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 05:01 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

#### Reasons

Ongoing issues around Whitmore Square such as homelessness, excessive drinking, intravenous drug use, violence and property damage have escalated year upon year. I do not believe that more social housing in the area is in the best interests or the safety of the current residents in the area. While I acknowledge the need for more affordable housing, I strongly oppose the suggestion that this area of the city with all of its existing issues is the right place to build it. The police services are already stretched, sometimes taking hours for patrols to arrive after disturbances have been reported, and I believe that the addition of this housing is only going to worsen the problem.

## Attached Documents



# Representations

**Representor 15** - Claudia Mudrik

Name	Claudia Mudrik
Address	16/60 South Terrace ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 05:51 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> The Whitmore Square is a heritage precinct and having a building with the characteristics proposed is no suitable for the area.It will make the area overly already busy with a 14 storey tower creating a huge amount of issues to the neighborhood.	

## Attached Documents

## Representations

### Representor 16 - Tiago Miranda

Name	Tiago Miranda
Address	16/30 Winifred street ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 05:51 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

#### Reasons

I believe it should be refused because: - the area is already crowded - it will ruin the character of the region - there are better places on the east or north of the city for this project - it could decrease the current property values around the area - it requires more basic services of which are already very tight - the location isn't suitable considering all the other social services and private business around it

### Attached Documents

## Representations

**Representor 17** - Thomas Ladewig

Name	Thomas Ladewig
Address	29 Halls PI ADELAIDE SA, 5000 Australia
Submission Date	11/04/2025 09:11 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

At 46.3m the building is too tall. It is significantly over the height specified for the area (29m). It does not suit the character of the area and taller buildings should be reserved to the northern section of the city. Calling it social housing is questionable. Under bicycles it states the 6 for dwellings and 6 for visitors is enough for 36 dwellings (when they admit 1 per dwelling is the standard) as the residents will not be able to afford an average of 1 bicycle per dwelling. If the residents can't afford 1 bike then how will they be able to afford to rent in the city with a premises that has 2 elevators and decent apartment sizes. Will the property be social housing in 20-30 years' time and if not, should it not also be planned for a different clientele in the future.

## Attached Documents

## Representations

### Representor 18 - Tiffany Austin-Sanchez

Name	Tiffany Austin-Sanchez
Address	23 hamley street ADELAIDE SA, 5000 Australia
Submission Date	12/04/2025 08:07 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

#### Reasons

The council's own policy is around attracting families into the city. Development of one bedroom apartments is not going to achieve this. Also there has been an increase in anti social behaviour in Whitmore Square , residents of the area have the right to be able to enjoy it without fear of their safety. Many young children cross the square to catch buses etc and I fear that a 'social' housing development would only increase the antisocial behaviour , police attendance is almost daily. This development would be an eyesore for the area as many heritage buildings surrounding. I am opposed and do not support this development being built.

### Attached Documents

Representations

Representor 19 - Philip Sinclair

Name	Philip Sinclair
Address	201 Gilbert st ADELAIDE SA, 5000 Australia
Submission Date	12/04/2025 08:42 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons	

Attached Documents

Representations

Representor 20 - Zara Sanchez

Name	Zara Sanchez
Address	23 Hamley street ADELAIDE SA, 5000 Australia
Submission Date	12/04/2025 09:03 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

Reasons

As a young person who has lived around Whitmore square for my entire life, I have never experienced such antisocial and upsetting behaviour from the surrounding people in these welfare organisations. I use public transport daily to get to and from school, along with other school students, all under 18 year old, and we experienced some extremely gross behaviour. An example I experienced over the last few months from people being supported in these organisations was being harassed. A group of people who were significantly older than me, drinking in the square, slurring at me. I was just walking through the direct path in the centre of the square. Then an older male continued to tell me to come over repeatedly and then harass me as I just tried to get to the other side of the square. This terrified me as a young girl, as any would. As well as this singular experience, waiting at the bus stop near the square has stressed me out since I began using it in 2022. People exhibiting anti social behaviour towards me and other locals; touching, yelling, swearing and sharing outright inexcusable behaviour. I just want to share that I have no problem with people seeking help from violence and financial issues, however a lot of these organisations attract these people to a very communal area. A lot of young children use the space and they shouldn't have to witness people exhibiting this sort of behaviour so young. My worries stand that this building may attract more of this antisocial behaviour, and make it an even unsafer space for local members of the public. Events I have heard from others who live hear includes; a lady using a persons door as a toilet, then continuing to throw farces on the owner when confronted, fights near the square (sometimes these people having young children with them), being followed or feared being followed, someone attempting to kick a dog, the list goes on. Even around the local playground they are abusing families under the impression of alcohol and other illegal activities. Me and others have not felt this unsafe in our time living or owning a business around here. Therefore I ask you to rethink this decision. This is not the place to create housing in such an area, already withholding so much sad behaviour for me and so many others, most of which use the space are minors.

Attached Documents

## Representations

### Representor 21 - Elaine Cain

Name	Elaine Cain
Address	U102/129 Sturt St ADELAIDE SA, 5000 Australia
Submission Date	12/04/2025 12:09 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

#### Reasons

As a long term city resident, I am concerned about the height of the planned building and the impact this will have, overshadowing smaller buildings, resident privacy of smaller buildings being breached due to visibility from a significantly higher structure & increased strain on local infrastructure, by cramming so many people in one location in an already volatile corner of the city (more people will add more psychosocial hazards). Social housing doesn't need to equate to creating another problem by increasing stress on the Unity residents, those sleeping rough, people who come to this area to drink and take drugs & the limited non government charities struggling to help people. Rather than putting a building of this size, smaller-sized, well planned more community minded housing where people can start to become part of the South West community, connected rather than disconnected by being stuck in a massive high rise, would support people's well-being. This could also reduce the likelihood of a crowded corner of the city becoming like a slum, exacerbating existing issues I've directly experienced over 10 years. There are lessons globally and locally, especially in Melbourne, about what happens when you put up buildings like this being proposed, put sometimes vulnerable people into an already often violent & dysfunctional corner of a city. A better planned approach across different pockets of the city to assist people to integrate & live more peacefully in smaller structures, would support both individual's needs, existing residents & associated support services. In addition to this, planning a building space that is fit for a future hotter climate, should include green spaces, renewable energy powering a smaller structure that will then assist residents financially longer term with power bills. A bigger structure will absorb more heat, have higher costs & ultimately cause more living cost stress.

### Attached Documents



## Representations

### Representor 22 - Anna Flouris

Name	Anna Flouris
Address	30 Little Gilbert Street ADELAIDE SA, 5000 Australia
Submission Date	12/04/2025 02:16 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

#### Reasons

Destroys the area and usability of park. More vehicles on a road that is very congested already, especially as the lights in this area only allow 2-3 cars in at a time. It is already frustrating and residents are certainly complaining. Devalues neighbouring property, including the one we own as people live in this part of the CBD as it is less populated than the eastern and northern ends. It will destroy the skyline and only real remaining access to night sky in the CBD. Current street parking cannot cope with more residents and vehicles. Impact on general vibe whitmore square as it primarily used as a park and feeling safer for kids in the last few years. Breaches height restrictions of buildings in this location. Breaches access for pedestrians and this application also breaches bike storage requirements. Will impact on traffic visibility, and increase traffic and associated anti social behaviour. Breaches drainage requirements. Despite stated purpose of building, this design is clearly about priority development, not people and social housing. The philosophy in the application is minimal.

### Attached Documents

## Representations

### Representor 23 - Aoife Milson

Name	Aoife Milson
Address	30 Little Gilbert Street ADELAIDE SA, 5000 Australia
Submission Date	12/04/2025 02:28 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

#### Reasons

Destroys the area and usability of park. More vehicles on a road that is very congested already, especially as the lights in this area only allow 2-3 cars in at a time. It is already frustrating and residents are certainly complaining. Devalues neighbouring property, including the one we own as people live in this part of the CBD as it is less populated than the eastern and northern ends. It will destroy the skyline and only real remaining access to night sky in the CBD. Current street parking cannot cope with more residents and vehicles. Impact on general vibe whitmore square as it primarily used as a park and feeling safer for kids in the last few years. Breaches height restrictions of buildings in this location. Breaches access for pedestrians and this application also breaches bike storage requirements. Will impact on traffic visibility, and increase traffic and associated anti social behaviour. Breaches drainage requirements. Despite stated purpose of building, this design is clearly about priority development, not people and social housing. The philosophy in the application is minimal.

### Attached Documents

# Representations

**Representor 24** - Nicolas Hoeglund

Name	Nicolas Hoeglund
Address	41 Hoskin Ave KIDMAN PARK SA, 5025 Australia
Submission Date	12/04/2025 04:38 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

**Reasons**  
Adelaide boasts a rich history and an array of unique heritage-listed properties that deserve our utmost respect. Building a 14-storey monstrosity around one of the last remaining parks untouched by overwhelming development would be an insult to the beauty of the Adelaide CBD. Many Australian capitals have sacrificed their old charm and aesthetic appeal for the sake of convenience and modern developments, and we must not follow that path. It's imperative that any new development reconsider the height of such buildings and genuinely study the surrounding heritage. We need to draw inspiration from the true character of Adelaide to avoid descending into a city dominated by soulless skyscrapers. Let's prioritize preserving our city's charm and aesthetic integrity!

## Attached Documents

## Representations

**Representor 25** - Paul Johnston

Name	Paul Johnston
Address	9/ 44 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	13/04/2025 11:17 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I support the development with some concerns

### Reasons

Building height PO 4.1 & 4.2 The proposed design is 46m when the height limit is 29m. We believe that the width of the building (8.9m) is out of proportion to the height. Viewed from the square it will look ungainly, especially when adjacent to heritage buildings & an eco designed building. Bike spaces There are only 6 bike spaces in the proposed design. With no car parking, most tenants will probably have bikes. This should be encouraged. At least another 35 spaces are required. Social Housing While we appreciate the urgent need for social housing, research shows that the 100% model involves many potential challenges due to the complex needs of tenants. Whitmore Square already has significant issues with noise and violence common. A mix of housing tenants is required. Communal Space Communal rooftop al fresco and gardens has been successful in other social housing designs. This would be desirable at 8 Hocking Place.

## Attached Documents

## Representations

**Representor 26** - Bernard Sanchez

Name	Bernard Sanchez
Address	23 Hamley st ADELAIDE SA, 5000 Australia
Submission Date	13/04/2025 06:25 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> It's two big for the square. Why would you put such a high building in an heritage area. More social housing in the area. Why not put it at North Adelaide. The locals would be more then happy. Is Whitmore square vieved as an area for social housing. My family has lived here for 25 years and the antisocial behavior has increased drastically. My daughter, wife and I have been threatened many times and we don't need a building full of antisocial people.	

## Attached Documents

Representations

Representor 27 - Wilson Dang

Name	Wilson Dang
Address	5000 ADELAIDE SA, 5013 Australia
Submission Date	13/04/2025 09:52 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> I believe the plan to approve a government subsidised complex will increase the crime rate to my neighbourhood area where I prefer it to be peace and quiet. The location is right next to my apartment	

Attached Documents

# Representations

Representor 28 - Tess Walch

Name	Tess Walch
Address	106/129 Sturt St ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 08:14 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

**Reasons**  
The building size is not in keeping with the surrounding buildings. Affordable housing should be built in the suburbs and not in the city and not in this part of the city where the problems in this area are already out of control with the services located around Whitmore Square. I have people shooting up outside my bedroom window, people defecating at our front door regularly etc.

## Attached Documents

Representations

Representor 29 - Juan Paolo Legaspi

Name	Juan Paolo Legaspi
Address	4/44 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 08:38 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
Reasons	

Attached Documents

Submission-to-Development-Application-24042414-1491668.pdf
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**Submission on Development Application – 8 Hocking Place, Adelaide**

**Application ID: 24042402**

14 April 2025

To whom it may concern

I am writing to formally object to the proposed development at 8 Hocking Place, Adelaide.

As a resident of Troppo Apartments (42-56 Whitmore Square) since 2016, I can confidently say that local residents in the area have a deep commitment in the future growth, safety, and prosperity of our community. This apartment building, along with adjacent and nearby apartments such as the Ergo and Christie's Walk developments on Sturt Street, are successful case studies of the City of Adelaide's previous efforts to promote affordable home ownership through innovative developments.

This application does not align with the City of Adelaide's Development Plan or State Government planning codes or policy. This submission addresses the following primary concerns:

- Excessive building height that violates planning standards.
- Lack of mixed-use functionality inconsistent with City of Adelaide's vision.
- Inadequate parking provisions in a high-density area.
- Community safety concerns linked to concentrated social housing.
- Failure to promote affordable home ownership opportunities.

I outline these concerns in further detail within Appendix 1.

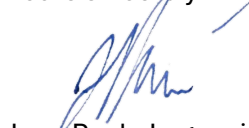
The policy of "rack 'em stack 'em" social housing is obsolete. International evidence is quite clear on the need for mixed-use developments with appropriate amenities and services. This development application does nothing to address any of these issues.

This submission is not rejecting the notion of social housing. However, given the existing density of existing social housing in the area, the developments lack of contribution to services and amenity, combined with the existing mixed-use developments of the area to promote affords housing means that the application is out of step with the interests of the local community.

The development should have a built form that can promote affordable home ownership opportunities, such as shared equity schemes or community housing models that offer pathways to ownership. This would align the proposal with the broader vision of promoting economic inclusion and stability within the local community. Including retail and car parking provisions would also align the proposal with the Development Plan.

I strongly urge the Assessment Panel to reject this proposal in its current form so that the applicant aligns the development proposal to align with local government and state government planning policies.

Yours sincerely



Juan Paolo Legaspi

**Resident**

# Appendix 1- Itemised Objections

## Lack of Mixed-Use Elements

The proposal disregards the need for commercial or community facilities, contrary to planning objectives aimed at fostering a dynamic, inclusive community.

The Planning and Design Code and the City of Adelaide Plan 2036 promote diverse, integrated communities featuring residential, commercial, retail, and leisure functions. However, the proposed development is exclusively residential, failing to provide amenities or opportunities that contribute to the broader community's economic and social vibrancy.

**Policy Reference:** Capital City Zone – Desired Outcome 1; City of Adelaide Plan 2036

**Impact:** This failure to provide mixed-use functionality limits economic participation and social interaction, hindering the City's vision for an activated, economically prosperous precinct.

## Lack of Housing Diversity

The area surrounding Whitmore Square already has a high density of social housing options. By focusing exclusively on rental-based social housing, the proposal contradicts broader planning objectives aimed at promoting a balanced and inclusive housing market.

The City of Adelaide Plan 2036 emphasizes that sustainable urban growth requires a diversity of housing options catering to various demographics, including owner-occupiers. Additionally, the State Planning Policies (SPPs) and the State's Housing Strategy 'Our Housing Future 2020-2030' emphasize the importance of supporting home ownership opportunities to enhance social stability, economic investment, and community cohesion.

**Policy Reference:** Housing Diversity and Affordability General Development Policies – PO 1.1; City of Adelaide Plan 2036; State Planning Policies (SPPs); State Housing Strategy *Our Housing Future 2020-2030*.

**Impact:** By failing to provide opportunities for affordable home ownership, the proposal discourages investment from owner-occupiers who are more likely to contribute positively to the community's social and economic fabric. The reliance on rental-based models exacerbates transience and reduces the area's overall appeal as a stable, vibrant neighbourhood.

## Building Height

The proposed building height of 46.3 metres exceeds the maximum height limit of 29 metres stipulated for the Capital City Zone under the Planning and Design Code (PO 4.2). This excessive height represents a violation of established guidelines intended to maintain a coherent built form and urban character.

The application attempts to justify this height by citing the construction of the Bohem Apartments as an exception. However, Bohem provided mixed-use elements, additional car parking, and amenities to the area. These are features which the application lacks.

**Policy Reference:** Capital City Zone – Performance Outcome (PO) 4.2.

**Impact:** The development's height will visually dominate the area and diminish the overall aesthetic appeal and heritage value of nearby buildings, including the Troppo Apartments and other significant sites around Whitmore Square.

## Parking and Traffic Congestion

The absence of dedicated car parking for a 14-storey, 36-dwelling building is inadequate, particularly in a high-density urban environment.

The State Government recently announcing changes to planning legislation to further discourage the practice of new developments being constructed with no car parking provisions.

**Policy Reference:** Planning and Design Code – Infrastructure and Transport provisions PO 3.1.

**Impact:** The lack of parking will exacerbate existing congestion issues, strain local infrastructure, and reduce accessibility for residents who rely on vehicles for daily activities.

## Community Safety and Cohesion

Whitmore Square has experienced ongoing community safety concerns, particularly at night. Concentrating additional social housing developments within an area already dominated by such services further entrenches social and economic segregation, rather than promoting a balanced, inclusive community as envisioned by local planning policies.

**Policy Reference:** Housing Diversity and Affordability General Development Policies – PO 1.1; City of Adelaide Plan 2036.

**Impact:** The development's narrow focus on rental-based social housing fails to address the broader vision for a mixed-use, inclusive neighbourhood that attracts a range of residents, businesses, and amenities.

## Summary

The proposed development at 8 Hocking Place fails to meet the planning objectives set out in the Planning and Design Code and the City of Adelaide Plan 2036.

By prioritising rental-based social housing, exceeding height limits, neglecting mixed-use principles, and failing to provide adequate parking or community services, this proposal poses substantial risks to the social, economic, and potential of Whitmore Square.

I strongly urge the Assessment Panel to **reject this application**.

## Representations

### Representor 30 - Victoria Rotolo

Name	Victoria Rotolo
Address	Parcel locker 10139 02363 ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 03:38 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

#### Reasons

I do NOT support this development in this area due to the already existing crime rate in whitmore square. I live in this area and already do not feel safe with the existing public housing and the recipients that already reside in this area. I'm a 25 year old female and I do not feel safe leaving my apartment. This public housing will only increase this issue.

### Attached Documents

## Representations

### Representor 31 - Alys Horn

Name	Alys Horn
Address	121 Gilbert Street ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 04:53 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> This development is not at all suitable to be built in this community heritage precinct. It breaches the height restrictions by nearly double! A 46 metre building being squeezed on to this tiny block should not be approved. An unattractive massive structure in the southwest corner of the city is a money-making project planned by a developer who does not care about community expectations or our quality of life. It will impede pedestrian access and will overlook housing for hundreds of metres all around it.	

### Attached Documents

Representations

Representor 32 - Yongzhong Li

Name	Yongzhong Li
Address	5000 ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 05:17 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons	

Attached Documents

## Representations

**Representor 33** - Andrew Dimitri

Name	Andrew Dimitri
Address	44 Gilbert Street ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 05:45 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> First of all, a 14 Storey building in that area is ridiculous. To make it social housing, where you're effectively building a giant slum in the city, is not something that anyone in their right mind would support or recommend. Strongly do NOT support.	

## Attached Documents

## Representations

### Representor 34 - Carmine Belperio

Name	Carmine Belperio
Address	94, Sturt St ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 06:26 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I support the development
<b>Reasons</b> There is an urgent need for affordable housing. The area has lovely amenities that should be available.	

### Attached Documents



## Representations

### Representor 35 - Terence Aspinall

Name	Terence Aspinall
Address	309 / 50 Sturt Street ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 07:04 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

#### Reasons

I do not support allowing the building of a 14 storey residential 'tower' in such close proximity to Whitmore Square. Whitmore Square is a place for families & friends, children & community groups to congregate, have picnics & allow children & pets to play. In fact, there are much too many ugly buildings & property developments in the Adelaide CBD already. This development would, I feel, certainly not enhance the aesthetic character of Adelaide in any way. I also have heard from others that it may breach acceptable height allowances, & may affect traffic visibility, pedestrian access & possible drainage requirements. I am therefore fervently advocating that approval should not be granted to the property developers of this monstrosity.

### Attached Documents

## Representations

### Representor 36 - Margaret Hayman

Name	Margaret Hayman
Address	6/101 Sturt st ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 09:02 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> The building is too high and exceeds the number of storeys for the area. It is not following sustainable building practices. It will be hard to cool with west facing windows and will use excess air conditioning in summer. This will have an environmental impact and also create financial stress for the residents.	

### Attached Documents

# Representations

**Representor 37** - Arjunaa Wimalathanasan

Name	Arjunaa Wimalathanasan
Address	1903A/160 Grote Streen ADELAIDE SA, 5000 Australia
Submission Date	14/04/2025 09:11 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> Another high rise tower. More reflections bouncing extreme summer heat in every direction. So many towers already Adelaide city does not need more. They are ugly, they reflect light and heat from very hot summer days in every direction.	

## Attached Documents

## Representations

**Representor 38** - Vangeli Karakousis

Name	Vangeli Karakousis
Address	1215 156 Wright street ADELAIDE SA, 5033 Australia
Submission Date	14/04/2025 11:47 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

Adelaide council has not supplied enough infrastructure for the amount of high-rise buildings that are being built within the Adelaide CBD. The roads are congested the Skyline is full of high-rise as Wellings. Council needs to become more active in providing the residents of Adelaide with more amenities and having only two car chargers is a complete joke. No plans to combat the rise of electric cars and Urban buildup within the city. Just a grab for council rates. Fix the infrastructure first and then perhaps expand high-rise Urban living within the the CBD. Sydney and Melbourne a year's in front in planning for expansion yet South Australia and in particular the Adelaide City Council thinks it's 1970s still.

## Attached Documents

## Representations

**Representor 39** - Daniel McBride-Hellewell

Name	Daniel McBride-Hellewell
Address	5/28 Russell st ADELAIDE SA, 5000 Australia
Submission Date	15/04/2025 12:42 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

RE: Objection to Proposed Development at Whitmore Square I am writing to formally object to the proposed development of a high-rise social housing building on or near Whitmore Square. While I fully support the need for equitable housing solutions in our city, the proposed project in its current form raises several serious concerns regarding both its design and its broader impact on the community.

- 1. Inappropriate Scale and Height** The proposed building significantly exceeds the established maximum height restrictions for this area. This sets a dangerous precedent for future developments and undermines the planning controls designed to maintain the character and integrity of the precinct. Whitmore Square is a unique and historic part of Adelaide, and overdevelopment threatens its balance and heritage value.
- 2. Loss of Openness and Green Space Amenity** Whitmore Square serves as an important open green space for city residents, workers, and visitors. The proximity and height of the proposed development will severely compromise the openness of the square, casting large shadows and disrupting the sense of space and tranquillity that currently exists. This would be a permanent degradation of a public asset that many in the community deeply value.
- 3. Risk of Social Disconnection and Decline in Safety** Concentrated social housing developments have historically been linked to social issues when not integrated thoughtfully into the urban fabric. This proposal risks creating a high-density enclave that could, over time, contribute to social isolation, economic disadvantage, and increased unsafe behaviour around the square. Rather than fostering community integration, the scale and density of this development may inadvertently create a "ghettoisation" effect – counterproductive to the goals of social inclusion and urban vitality.

In summary, this proposal is poorly suited to its location, fails to respect planning guidelines, and poses serious risks to the social and environmental quality of Whitmore Square. I urge Plan SA to reconsider this development in its current form and to engage with the community in a transparent and meaningful way to ensure that future developments enhance, rather than undermine, the character and liveability of our city. Sincerely, Dan Local Resident since 2005

## Attached Documents

## Representations

**Representor 40** - Connor Birss

Name	Connor Birss
Address	1406/156 wright street ADELAIDE SA, 5000 Australia
Submission Date	15/04/2025 12:45 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

I recently bought the property at which I reside. There is significant problems with Aboriginals and homeless in Whitmore Square. They are constantly drinking, fighting and getting away with other antisocial behaviour such as setting off fireworks in the park. It keeps me up at night. Building affordable housing in the area will just attract more of these characters and bring down the value of my and everyone else's property in this beautiful neighbourhood. Something needs to be done and inviting more of this behaviour to the area is unacceptable.

## Attached Documents

# Representations

**Representor 41** - Robyn Long

Name	Robyn Long
Address	6/15 Hocking Court ADELAIDE SA, 5000 Australia
Submission Date	15/04/2025 02:33 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

**Reasons**

I understand that the proposed building would exceed the local maximum height limit by 29 meters and would violate requirements related to pedestrian access, bike storage, visibility, and drainage. Furthermore, the area already has a significant population of homeless individuals, leading to disturbances, particularly at night. Additionally, I believe this location is part of a heritage precinct, and such a development would not contribute positively to the character of the area. This corner of Whitmore Square is quite compact, and adding over 36 new residents would not be conducive to a harmonious environment.

## Attached Documents

## Representations

### Representor 42 - Anstey Baldwin

Name	Anstey Baldwin
Address	U6 16 Hocking Court ADELAIDE SA, 5000 Australia
Submission Date	15/04/2025 02:54 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I support the development with some concerns

#### Reasons

Due to the quantity of multidwelling buildings in the immediate area and the fact the building has no parking, it will cause further issues in that regard around Whitmore Square and the 3 parking spots down Hocking Court. Whilst the building has plans for bike storage that will not solve the parking issues as people still use cars. The height of the building will also prevent afternoon sunlight to the residents of existing buildings down Hocking Place/Court. Noise pollution. There is already a lot of noises coming from the existing buildings down the street and an influx of potentially 84+ new residents could make the current issue worse. Whilst there is a need for more housing such as this, the property has a higher density than the other social housing on the same street and will stand out in a way that does not fit Whitmore Square.

### Attached Documents



Representations

Representor 43 - Michael Bishop

Name	Michael Bishop
Address	261 Sturt Streety ADELAIDE SA, 5000 Australia
Submission Date	15/04/2025 02:54 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

**Reasons**

I am writing on behalf of myself and fellow neighbours to strongly oppose the proposed 14-storey development. While I support increased activity and density in the CBD, this site is entirely unsuitable for a building of this scale for several compelling reasons. Firstly, the proposed height of 14 storeys far exceeds the area’s planning guidelines, which suggest a limit of around 9 storeys (29m). This excessive height will dominate the surrounding area, creating an imposing and out-of-place structure that disrupts the character of the CBD. The site’s small size worsens this issue, forcing the building to extend boundary to boundary, leaving no room for thoughtful design transitions or setbacks to soften its impact on neighbouring properties. Secondly, the development fails to respect the adjacent State Heritage-listed building, which houses the Salvation Army (formerly the Bushmen’s Club). This heritage site, with its significant cultural value, deserves protection. A 14-storey tower looming over it would overshadow its presence and diminish its historical prominence. The proposal shows little consideration for aligning with the heritage building’s form, materials, or aesthetic, which is a clear oversight. Additionally, the development disregards the nearby Adelaide Affordable Eco-housing, a 4.5-storey complex designed with sustainability and community in mind. The proposed tower’s height and blank-walled northern façade will cast shadows over the Eco-housing, reducing sunlight and impacting residents’ quality of life. It also ignores the Eco-housing’s unique façade, street verandah, and sustainable design principles, showing no attempt to harmonise with its neighbour’s character. Hocking Lane dwellings will also suffer, as the tower’s scale will overshadow and loom over these low-rise homes, creating an oppressive environment for residents. The lack of “stepping” in the building’s design—gradual height transitions to blend with the surroundings—further highlights its incompatibility with the area. Finally, the proposal’s sustainability claims ring hollow. The north-facing blank wall and heavily glazed western façade suggest poor energy efficiency, likely requiring constant air-conditioning to maintain comfort. This contradicts true sustainable design, especially when compared to the Eco-housing’s thoughtful approach from 2004. The developers’ technical arguments seem more like marketing than genuine environmental commitment. This development, in its current form, prioritises profit over community, heritage, and sustainability. I urge Plan SA to reject the proposal and encourage a design that respects the site’s constraints, honours the area’s heritage, and aligns with the CBD’s long-term vision for balanced growth.

Attached Documents

Representations

Representor 44 - Lillian Bilsborow

Name	Lillian Bilsborow
Address	6/1 witcombe st, ADELAIDE SA, 5000 Australia
Submission Date	15/04/2025 02:55 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons	

Attached Documents

## Representations

**Representor 45** - janet giles

Name	janet giles
Address	32 whitmore square ADELAIDE SA, 5000 Australia
Submission Date	15/04/2025 04:46 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

### Reasons

the proposed development fails to meet a number of requirements in the area. - it is above the height limit - and out of sync with the surrounding buildings, e.g. eco-housing, cottages. The maximum height of other surrounding buildings is 4 stories. - it is adjacent to a state heritage building and will undermine the heritage value of the area - it overlooks and blocks the light of a large number of properties - it is poorly designed with pokey apartments, (57sq m) very little communal space and little outdoor area. - it blocks the light of apartments to the north who all have south facing windows. - It does not compliment the area which is largely low level residential, green space. - the proposal has poor and out of date information about Whitmore Square and surrounding services and issues. - The corner where the building is proposed is right next to the entrance of the Salvation army Sobering up unit and also the distribution of clean needles where people gather each morning and evening. It is a narrow corner and road with two way traffic. Current residents in Troppo Apartments and Hocking Court are already impacted by the activity in this corner of the square and this will only increase the issues they face. the construction of the proposed building in the very tiny and inaccessible site will be highly disruptive for the residents. A large number of people live in this very small area and to add another 36 homes will create an unreasonable level of population density. - there will be not car parks on site and only 6 bike parks. The application stereotyped the proposed tenants stating they were unlikely to own bikes. If tenants own cars this will have a major impact on the already tight parking availability in this area.

## Attached Documents

## Representations

### Representor 46 - Raffaele Tardivo

Name	Raffaele Tardivo
Address	32 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	15/04/2025 05:23 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

#### Reasons

1) The height of the proposed development of 14 storeys is in much too high and much more than the 9 storeys permitted in that zone. At most any developmnet on that site should be no more than 9 storeys tall, and preferably no more than the Ergo development in Sturt Street. 2) It dwarfs all other development in that corner of Whitmore Square. 3) While the application says its intent is to provide social housing, no social housing provider - public or provider - is listed as a partner. I question their motives in nominating the development in this way. I believe the developer believes this will make approval easier to achieve. 4) The size of the apartments at 58 square metres, the same size as an AFL goal square, is too small. 5) It is adjacent to and totally dwarfs the state heritage listed Salvation Army building. 6) The building itself has no architectural merit. 7) This is an inappropriate development for the location and should be rejected.

### Attached Documents

# Representations

**Representor 47** - Robert Naudi

Name	Robert Naudi
Address	121 Sturt Street, ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 08:45 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> I am writing as a property owner. I do not beleive this should be permitted as it will drastically overshadow my heritage listed building at 121 Sturt St.	

## Attached Documents

## Representations

**Representor 48** - Alex Romanos

Name	Alex Romanos
Address	13 Sturt Street ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 08:45 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> A 14 storey building will be an absolute eyesore in this particular position. It will overshadow surrounding buildings. It is not at all in keeping with surrounds. I am generally pro development in CBD however this building is way out of step with its neighbours and does not represent positive progress. The fact that is set to be social housing will only increase existing problems of violence and antisocial behaviour in Whitmore / Ivarritji already faced by local residents and business owners.	

## Attached Documents

## Representations

**Representor 49** - Virginia Barratt

Name	Virginia Barratt
Address	4/16 Nelson Place ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 09:54 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

This area of the city is a place where people gather to feel safe and access something like nature in the city. It has long been a contested space in the city and only now is it beginning to feel like it has some love. This building is a blot on the landscape of this park, this gathering place, it feels not in keeping with the buildings around it, potentially breaches height restrictions, walkability, sun on the park in the afternoons, visibility. It is an ugly addition to a becoming-lovely part of the city. Adelaide has so many tall ugly buildings, this does not enhance livability. I thought Adelaide was supposed to be a beautiful, liveable city? This does not help. Thanks.

## Attached Documents

Representations

Representor 50 - Olivia Piper

Name	Olivia Piper
Address	Unit 27 56 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 09:55 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
Reasons	

Attached Documents

Submission-to-Reject-Application-24042402-1492382.pdf
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# **Subject: Objection to Proposed Development at 8 Hocking Place, Whitmore Square**

## **Application ID 24042402**

To Whom It May Concern,

I am writing as a resident of Whitmore Square to express my strong objection to the proposed development of new social housing at 8 Hocking Place.

While I fully support the intent behind social housing and recognise its vital role in supporting vulnerable individuals, I believe the location and circumstances surrounding this proposal demand serious reconsideration. I outline my key concerns below for your review and request that the Council take them into account before proceeding further.

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### **Key Concerns**

- **Crime and Social Issues**

Whitmore Square already experiences high rates of crime, drug use, and antisocial behaviour. Adding further high-density social housing to this area risks worsening these issues.

- **Community Safety**

Concentrating vulnerable individuals in a neighbourhood already under pressure undermines efforts to build a safe and cohesive community.

- **Impact on Property Values**

The presence of concentrated social housing may deter buyers and decrease property values, affecting many residents who have made long-term investments in the area.

- **Construction Disruption**

The construction phase will create noise, dust, and limited access, impacting families, shift workers, and residents working from home.

- **Privacy Issues**

The planned balconies face directly into neighbouring apartments, raising serious privacy concerns and reducing liveability for current residents.

- **Parking Problems**

The proposal offers no on-site parking, despite existing pressures in the area. The South Australian Government has acknowledged this issue in proposed planning reforms which support minimum car parking requirements for new developments.

- **Call for Community Engagement**

A development of this nature must involve proper consultation with local residents, police, and social services. We need a holistic approach that addresses the underlying causes of antisocial behaviour and crime before introducing further housing pressure to this location.

---

## **Conclusion**

I respectfully urge the Adelaide City Council, Plan SA and associated planning bodies to reconsider the proposed development at 8 Hocking Place. A more balanced, inclusive, and community-informed plan should be prioritised—one that does not compromise resident safety, liveability, or property values.

The Council has long championed the importance of community voice and engagement. To move ahead without genuine consultation would be contrary to these values and detrimental to the long-term cohesion of Whitmore Square.

Thank you for your time and consideration. I look forward to a resolution that supports both social responsibility and the wellbeing of the entire community.

Sincerely,

**Olivia Piper**

Resident of 42–56 Whitmore Square, Adelaide

## Representations

### Representor 51 - Rex Guthrie

Name	Rex Guthrie
Address	28 Tomsey Street ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 12:24 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I support the development

#### Reasons

I think Whitmore square and the SW area need this development and others in the coming years. The South West of the city has been a ragged and depressed in years past but the area is ever-improving and I'd like every incentive for developers to put up useful and needed buildings such as this 14 story housing development. Taller buildings should always be built adjacent to open spaces like Whitmore square - it's just common sense. I write this completely as an independent rate-payer of Adelaide and a free-thinking citizen of South Australia. I've witnessed too many ant-development activists over the last 50 years always saying no to developments via ideologically-based reasons. Interesting that 50 years ago Adelaide was the 3rd largest city in Australia but since anti-development activists and NIMBYs thwarted one development after another (including the MATTS Plan),, Adelaide stagnated and is now the 5th city. I have looked at the building proposal and it's building site, and I think the looks attractive enough and the site sorely needs redevelopment.

### Attached Documents

## Representations

**Representor 52** - Anthony Leggatt

Name	Anthony Leggatt
Address	186 Gilles street ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 01:35 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
<b>Reasons</b> I think 14 storey is to high for community housing. You only have to look at the 70s out at Elizabeth the multi storey flats be came a slum and had to be knocked down, the UK is also getting rid of its multi storey community housing. Don't make a mistake.	

## Attached Documents

## Representations

**Representor 53** - Ash Lord

Name	Ash Lord
Address	17 Russell Street ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 05:05 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I support the development with some concerns

### Reasons

I am concerned that the building wouldn't meet the needs of those that need it most. Whitmore square has always had transitional housing and refuges for those doing it rough, I would want this housing to replace the government housing property that was torn down on morphett street and the public housing on sturt street that seems to be in indefinite renovations. Having it as just in the affordable housing scheme isn't good enough. There are many living rough in whitmore who need support from their local government to make the transition into housing.

## Attached Documents

## Representations

**Representor 54** - Michael Pilkington

Name	Michael Pilkington
Address	7/191 Melbourne Street NORTH ADELAIDE SA, SA 5006 Australia
Submission Date	16/04/2025 05:11 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

This is a prime example of the over-development of a small ( $9.14\text{m} \times 27.43\text{m} = 250.7\text{m}^2$ , which is smaller than a tennis court) residential site which is adjacent to, and within, a heritage and historic neighborhood, of largely 3-4 storey buildings, both older and new. The project exhibits very poor urban design responses: It significantly exceeds the allowable height in the precinct of 9 storeys. It builds boundary to boundary because it is such a small site. A major north facade is simply 46.3m tall blank wall, which completely over-shadows it's neighbours. It contains absolutely no car-parking provision. It contains minimal outdoor spaces. it exhibits an extreme slenderness ratio of  $46.3\text{m}/9.14\text{m} = 5.06$ . It is an accentuated 'very skinny' proportion which is completely at odds with its historic neighborhood.

## Attached Documents

# Representations

**Representor 55** - Nilesch Khode

Name	Nilesch Khode
Address	180 Franklin st ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 05:46 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> Breaches height	

## Attached Documents

Representations

Representor 56 - Belinda Baker

Name	Belinda Baker
Address	Unit 8 44-56 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 08:10 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons	

Attached Documents

Reasons-against-proposal-24042402-1492609.pdf
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# Reasons against proposal 24042402

Reason 1 - Traffic assessment is inadequate - traffic will be increased and lack of parking will disadvantage prospective residents and visitors of residents.

I disagree with their assumption that traffic impact will be less than that observed typically with high density developments, due to the lack of onsite off-road car parking. My suggestion is that traffic will be worse as residents with vehicles cruise around trying to find available on-street parking. Current on-street free parking is already mostly occupied. Residents who have a vehicle will likely have to pay for limited parking, opt to park illegally or overstay timed parks, risking fines and further repercussions out of necessity. There is also the parking of visitors who most likely will have a car and require parking, including tradespeople and maintenance workers, cleaners, carers and support workers, social workers and at-home nurses.

I also disagree with the other point of the assessment that most services are readily available within the city, that residents will likely be working or studying in the city and so will forgo owning or using a car, in preference to PT and cycling. There is no analysis of the likely industries and type of employment that residents will most likely be in. Housing is now becoming unaffordable for a broader demographic of people, and the job market changes, with shifts in where people will be working or studying and in what industry. Currently the ABS data <https://www.abs.gov.au/statistics/labour/earnings-and-working-conditions/employee-earnings/latest-release#occupation> shows that the lowest paid occupations include caring and support work, labour and sales. If prospective residents for social housing were to include those within the lowest paid occupations, then I would argue that they would likely require a car, being able to drive to various locations, with equipment, beyond general business hours. There is also an increase in the proportion of people working two jobs, particularly amongst those who earn the least in their primary employment (<https://www.abs.gov.au/statistics/labour/jobs/multiple-job-holders/latest-release>). People with multiple jobs, and or further caring, community and study commitments will be pressed for time, making public transport use or cycling alone unfeasible.

As someone who does not have a car, I can attest that not having a vehicle can be a major impediment to gaining employment in a broad range of industries, accessing essential services such as specialist medical appointments, participating and contributing to the wider community, and experiencing the nature within our State's parks and beaches.

There is a risk to health and security when waiting for a bus at night alone or during extreme heat, particularly with bus services that are currently unreliable, either being late or not turning up at all. PT or cycling is generally not feasible for those with limited physical mobility. There is no Centrelink office in the city. No hardware store, or other retailer offering an affordable range of furniture, appliances or bulk goods. Many specialist allied health, medical and community services are also located outside the CBD.

If residents at Hocking place do happen to forgo owning a car because of the lack of parking, I believe that that would put them at greater disadvantage, potentially losing out on employment opportunities, missing crucial, appointments, meeting friends and family less, and having a greater reliance on expensive taxis, ride-share and delivery services.

If a resident were to have a car, it is possible that the lack of long term, secure parking during the day, will be an incentive to use their car instead for their daily commute, even if public transport or cycling was otherwise a viable option. This would undermine the efforts to increase public transport and cycling use, and increase traffic. I can say currently, the residents at Whitmore Square will sometimes request to use my own parking space, as they share a spot with a co-occupant and cannot find alternative off site parking.

## Reason 2 - Inappropriate location for Social Housing.

Being next to a sobering up clinic, it can be intimidating, particularly during the night when there is little other general thoroughfare. There are people, mostly adult men, who act in a way that can be perceived as threatening. No information has been provided on what particular cohort of people will likely be residing at the proposed development. Current SA housing tenants include those who have experienced or are at risk of experiencing domestic/family violence, those with a disability and women over 55 years

(<https://www.housing.sa.gov.au/public-housing/tenant-statistics>). Based on the current statistics provided by SA Housing, residents would include those who I would consider more vulnerable and the location alone would undermine the feeling of safety and security that a resident ought to have a right to.

## Representations

**Representor 57** - Robert Marin

Name	Robert Marin
Address	5 Whitmore square ADELAIDE SA, 5000 Australia
Submission Date	16/04/2025 10:19 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

I live on Whitmore square and the safety of residences is being daily threatened while the Council hide behind their ideology. The region has become a focal point for the indigent, the violent, the abusive, homeless, drug taking alcoholics. The square is consistently the subject to constant Police intervention as a result of domestic violence, drunkenness, defaecating, illegal activities on the square. The Council has all but ignored residences. The use of illicit drugs injecting themselves in our yards and using the property as their waste disposal. The proposal to add to the social housing is tantamount to condoning turning this section of the city into a ghetto. Meanwhile the people who actually pay rates, who live on the square are now threatened with an eyesore are being disadvantaged, and ignored again. Whitmore square attracts the disproportionately high insurance rates due to the increased risk of living in this region and you then want to add to the risk by attracting a lower socio- economic population. Too high, and objectionable a building. A focal point for Gangs and Mobs to migrate. Build it at Hindmarsh and Southwark where there is plenty of land and buildings of like dimensions at Bowden. Not another Bowden at the Whitmore Square. The talk about wanting people to live in the City is in contradistinction to creating a demographic that diminish Adelaide as an attraction. There are already buildings previously used for student housing that will suffice for social housing. Adelaide does not need more single bedroom hovels. Convert existing buildings for social housing if there is such a demand.

## Attached Documents

## Representations

### Representor 58 - Jess Black

Name	Jess Black
Address	503 whiteout road STANLEY FLAT SA, 5453 Australia
Submission Date	17/04/2025 10:56 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

#### Reasons

I worked in whitmore square for years. It's the last spot in Adelaide cbd that is genuinely a connected community. At this point in history exponential growth is plainly harmful. Leave whitmore square alone. Allow Adelaide to maintain a scheric of vibrancy.

### Attached Documents

## Representations

**Representor 59** - Peter Blazincic

Name	Peter Blazincic
Address	123 Sturt Street ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 12:31 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

This is a non complying development by the council code. It is significantly higher than allowed and it should not have even been accepted for consideration. Too high No set backs No car spaces No bike storage Restriction to access Hocking Place for neighbouring properties Already has a high number of social housing sites in area. High crime area due to drug clinics, alcohol clinics, shelters, Salvation Army and poor council effort to protect businesses and good residents. There is currently a social housing site on Sturt Street which has undergone extensive repairs due to damage by bad tenants. This has been a one of Adelaide's highest crime sites. Strong No to this non complying development

## Attached Documents

## Representations

**Representor 60** - Phillip Brunning

Name	Phillip Brunning
Address	PBA, Level 1/27 Halifax Street ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 02:03 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
<b>Reasons</b> Please refer to the attached representation	

## Attached Documents

Representation-on-behalf-of-Community-Corporation-No26347-Inc-of-42-56-Whitmore-Square-Adelaide-1492825.pdf

17 April 2025

Presiding Member  
State Commission Assessment Panel  
Submitted via the Plan SA Portal



Town Planning  
Development Advice  
Strategic Management

Attention: Ms Tegan Lewis, State Planning Commission

Dear Ms Thomas & Members

## **DEVELOPMENT APPLICATION 24042402 – REPRESENTATION IN OPPOSITION**

I refer to the abovementioned Development Application by Superfund Obenox Pty Ltd that seeks planning consent for the construction of a 14 level residential flat building containing 36 dwellings on land located at 8 Hocking Place, Adelaide.

As provided for, I make the following representation on behalf of Community Corporation No.26347 Inc. of 42-56 Whitmore Square, Adelaide in opposition of the proposed development for reasons discussed more particularly below.

### **1. Background**

The property 42-56 Whitmore Square, which adjoins the subject land to the north, is a four-level mixed use development comprised of 26 dwellings and a ground floor café at the corner with Sturt Street and a community garden.

42-56 Whitmore Square is an award winning affordable eco-housing project by the City of Adelaide, designed by Troppo Architects in 2010 that showcases best practice in sensitive and contextual medium density infill development.

Whereas apartments within this development were initially offered under the Federal Government National Rental Affordability Scheme, in 2021 the Council sold these apartments to the open market and are now predominantly owner occupied.



**Phillip Brunning & Associates**

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## 2. Proposal

The proposal is for a 14 level (46.3 m) residential apartment building comprised of 36 dwellings, with a ground floor 'communal area' with associated facilities, a lift lobby (2 lifts), small consulting room, bike store (6 bikes), a waste room and an infrastructure room with a roller door access to a lane running off Hocking Place.

Having reviewed the proposal documents provided, I note:

- the proposed building is to be built to the entire length of the northern property boundary, presenting effectively a blank wall to the adjoining land save for some detailing in the precast concrete panels and glass block windows;
- at the upper 3 floors (Levels 11-13) balconies are proposed with an opening to this northern boundary, the height of the solid balustrade not dimensioned but scaling at little over a metre;
- other than for the ground floor, a floor-to-floor dimension of 3.2 m is shown which in my experience is somewhat ambitious given the need to provide not only floor structure and services, but to achieve a ceiling height to afford suitable amenity;
- images, elevations and sections do not show the extent of lift over runs beyond the roof line and other roof top plant and equipment that would ordinarily be expected for a development of this scale;
- given a height over 25 m, two fire isolated stairs are required which in combination with lifts and corridor circulation represents some 30% of each floor plate above ground level;
- use of the ground floor 'communal area' is not clarified either on the proposal plans or by the accompanying planning report – I am of the view that the Applicant should be more forthcoming in this respect;
- apartments on Levels 1 to 10 are to be for a single bedroom and open plan kitchen, living and dining area totalling 54 m<sup>2</sup> each with a balcony of either 8 m<sup>2</sup> or 12 m<sup>2</sup> – the shared corridor is not provided with natural ventilation or light;
- at the upper three levels, apartments provide two bedrooms (two rather than three dwellings per floor) with a floor area of 82 m<sup>2</sup> and an 11 m<sup>2</sup> balcony – once again, the shared corridor is not provided with natural ventilation or light
- the sustainability report provided asserts that *the proposal will presents a significant increase in sustainable design and energy efficiency against minimum practice*. I fail to see initiatives beyond that which may ordinarily be required;
- noting that the land is subject to the Noise & Air Emissions Overlay, I note that an acoustic assessment has not be provided by the Applicant with the required level of detail and performance deferred until the detailed design phase; and
- whereas this development is presented as social and/or affordable housing, I see no evidence from the Applicant of any agreement or commitment in this regard with an *eligible rental provider*.



### 3. Context

The land on which this development is proposed has an area of 250 m<sup>2</sup> and is presently developed with a single storey former commercial building that is understood to have been used as a dwelling more recently.



Hocking Place is a narrow two-way minor street that provides access to numerous other residential streets and properties including to the rear of my client's property at 42-56 Whitmore Square and Christies Walk ay 127-131 Sturt Street.







As can be seen above, a 'cut off' has been provided as a gesture to afford convenient vehicle movement around this corner, and most importantly safe sight distance for motorists and pedestrians at an otherwise 'blind' corner.

The following images assist in understanding the streetscape in this locality as viewed from Whitmore Square noting the scale of existing buildings, including heritage places most notably the Salvation Army Hostel (State Heritage listed).





I also provide an image of the Boehme apartments building at the northern end of the square which is referred to and relied upon by the Applicant as justification for the scale of the proposed building.



Apart from this more recent building (which I consider to be somewhat of an aberration or anomaly) the townscape in this locality is characterised by single and two storey buildings (original building stock) with limited development up to 5 levels.





I have also been instructed by my client to provide commentary with respect to the social challenges faced by Whitmore Square and its environs including anti-social behaviour, violence, drug and alcohol use, theft and vandalism.

Given the concentration of community based social services in this locality, including emergency housing, the sobering up unit and a recent needle and syringe exchange program, that there is a high propensity for people with challenges to congregate.

Mindful that this is a broader social issue, and that the planning system may not alone resolve this, there is genuine concern held that a wholly social housing project for challenged and vulnerable individuals may only perpetuate disadvantage.

It is my client's understanding (based on available research<sup>1</sup>) is that a diverse tenure model whereby a lower concentration of social housing is achieved can facilitate higher mental wellbeing and satisfaction with safety for all concerned.

Surely a diverse tenure model in a location that is not already faced with entrenched disadvantage and social challenge is a more sustainable approach worth careful consideration moving forward.

In the absence of detail around the provision and management of this social housing project my client may have little confidence. I would have thought that this ought to have been provided prior to public notification being undertaken.

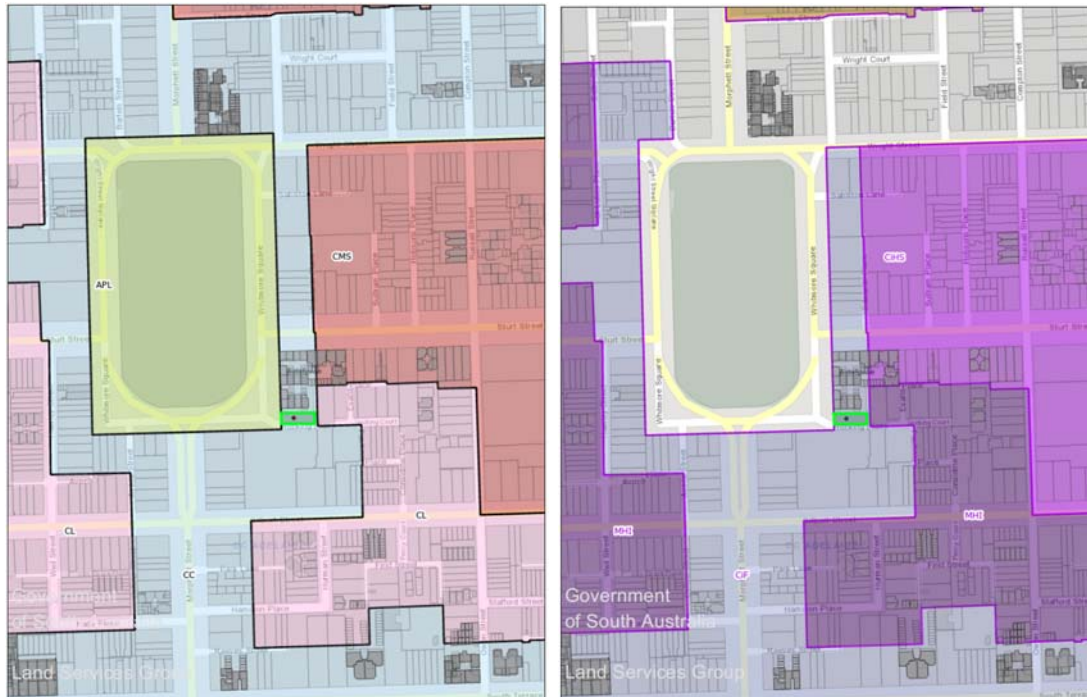
In providing this commentary, I stress that it is from lived experience in this locality and in an endeavour to improve the safety and wellbeing of all concerned, as evidenced by the past collaboration with relevant stakeholders.

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<sup>1</sup> Is de-concentrating social housing a useful policy to promote wellbeing? WELLBEING OF LOWER INCOME RENTERS IS HIGHER WHERE THERE ARE LOWER CONCENTRATIONS OF SOCIAL HOUSING – Australian Housing & Urban Research Institute, Research & Policy Bulletin, Issue 197 September 2015 ISSN 1445-3428

#### 4. Planning & Design Code

The land is located within the Capital City Zone and the City Frame Subzone.



The following Overlays apply:

- Airport Building Heights (Regulated) (*All structures over 80 metres AHD*)
- Affordable Housing
- Building Near Airfields
- Design
- Heritage Adjacency
- Hazards (Flooding - Evidence Required)
- Noise and Air Emissions
- Prescribed Wells Area
- Regulated and Significant Tree

The following Technical Numerical Variation (TNV) applies:

- Maximum Building Height (Metres) (*Maximum building height is 29m*)

General Development Policies under the following headings also apply.

- Clearance from Overhead Powerlines
- Design
- Design in Urban Areas
- Interface between Land Uses
- Site Contamination
- Transport Access & Parking

The proposal is subject to public notification and statutory referrals.

## 5. Assessment Considerations

The following matters are most relevant in the assessment of this proposal.

### 5.1 Zone Policy

Whereas the Applicant has sought to rely on the Boheme development at the corner of Morphett Street and Whitmore Square as justification for over height development, I think it important to note the following:

- the Boheme development is not located within a Subzone, and the TNV with respect to maximum building height in that location is 53 m;
- the land on which this development is proposed is located within the City Frame Subzone for which the maximum building height is 29 m; and
- the site of the Boheme development is appropriately 2000 m<sup>2</sup>, which is 8 times the size of the land on which this development is proposed.

It is also appropriate to note that the land on which this development is proposed is adjacent to the City Living Zone and the Medium-High Intensity Subzone (to the east) for which a maximum a maximum building height of 14 m and 4 levels is identified.

The minimum site area per dwelling in the Medium-High Intensity Subzone is 100 m<sup>2</sup>.

The relevance of this comparison is for the purpose of considering the interface with or transition of building scale and intensity from one subzone to the other. The Code anticipates development to the east at approximately half that on the subject land.

As clarified in Part 1 – Rules of Interpretation, the following hierarchy applies to the application of Code policy, with the TNV applied at the subzone level in this instance which prevails over that for the zone more generally.



It is my understanding that the Code applies these quantitative measures with conscious purpose so as to achieve the Desired and Performance Outcomes articulated for each zone and subzone.

These quantitative measures are informative, if not persuasive in the assessment of development. While the planning authority does enjoy a discretion, any departure should be for a proper planning purpose.

The Court has found on numerous occasions that the extent of departure from these clearly expressed quantitative measures (one way of achieving the relevant Performance Outcome) is an important consideration.

## 5.2 Land Use

### Affordable & Social Housing

This proposal is presented on the basis of being for use as affordable housing and/or social housing. These descriptors are used interchangeably through the documentation, including the public notice.

The meaning of *affordable housing* is clearly described by the Code.

**Affordable housing** Means housing that meets the relevant criteria for ‘affordable housing’ as determined by the Minister responsible for the *South Australian Housing Trust Act 1995* under Regulation 4 of the South Australian Housing Trust Regulations 2010.

A specific meaning is not however provided by the Code for social housing. The only reference to social housing in Code is within Part 4 - General Development Policies under the heading Housing Renewal.

The Code is clear with respect to the applicability of policies that relate to social housing.

**The Housing Renewal General Development Policies are only applicable to dwellings or residential flat building undertaken by:**

- a) the South Australian Housing Trust either individually or jointly with other persons or bodies
- b) a provider registered under the Community Housing National Law participating in a program relating to the renewal of housing endorsed by the South Australian Housing Trust.

As I understand it, neither of these criteria are satisfied.

In any event, I note the Desired Outcome expressed in relation to social housing.

**DO 1 Renewed residential environments replace older social housing and provide new social housing infrastructure and other housing options and tenures to enhance the residential amenity of the local area.**

For reasons that will be discussed in detail below, the proposed development would not objectively enhance the amenity of the local area. Quite the contrary, the proposal will have a profoundly negative impact on amenity of this locality.

Affordable Housing Overlay policies reinforce this theme of having regard to the character and amenity of the locality and also speak to avoiding a concentration but rather a distribution throughout the development.

**DO 1 Affordable housing is integrated with residential and mixed use development.**

**DO 2 Affordable housing caters for a variety of household structures.**

**PO 1.3 Affordable housing is distributed throughout the development to avoid an overconcentration.**

**PO 2.1 Affordable housing is designed to complement the design and character of residential development within the locality.**

Experience tells us that concentration of disadvantaged people in single developments or locations leads to negative social outcomes that may otherwise be avoided by adopting a more dispersed and integrated approach.

I note that this location is not subject to the Affordable Housing Overlay. While this is not to say that affordable housing is inappropriate in this location, the Code has not identified this land as being within an area where such is specifically desired.

With respect to the proper characterisation of the nature of development proposed, I fail to see how the planning authority may reasonably proceed on the basis of it being either affordable or social in the absence of a specific agreement or arrangement.

The application documents provide no specificity in this regard.

Accordingly, I would caution the planning authority from countenancing any argument or justification proffered by the Applicant that additional building height is warranted on the basis of affordable housing being proposed.

Indeed, the proposal may be *hypothetical* in the absence of this detail.

### Activation & Vibrancy

While residential development is clearly envisaged as an appropriate in the Capital City Zone, I interpret the policy as seeking mixed use development including residential and that at ground level non-residential uses should be provided.

**PO 2.1 Non-residential land uses at ground floor level such as shops and restaurants support and maximise pedestrian activity to provide visual interest and positively contribute to public safety, walkability and vibrancy.**

This Performance Outcome is reinforced by the following for the City Frame Subzone.

**PO 2.2 Buildings create visual interest and active street frontages to maximise passive surveillance of the street and Adelaide Park Lands Zone.**

These provisions seek activation at street level to enhance public safety and vibrancy. I am not convinced that a glass fronted common room at ground level for residents will achieve this outcome.

I note that elsewhere on the proposal plans this ground level space is referred to as a 'commercial tenancy'. The Applicant should be required to clarify the exact nature of the proposal with respect to land use.

## **5.3 Building Height**

### Maximum Height

The Code clearly identifies the maximum building height for this location as 29 m.

The proposal seeks 46.3 m which is nearly 60% in addition to this stated maximum.

The quantum of this departure should be reason for concern and greater scrutiny. Where the TNV is not satisfied, the relevant Performance Outcome seeks development that positively responds to the local context.

**PO 4.1 Building height is consistent with the form expressed in any relevant *Maximum Building Height (Levels) Technical and Numeric Variation layer* and *Maximum Building Height (Metres) Technical and Numeric Variation layer* or positively responds to the local context and achieves the desired outcomes of the Zone.**

While an increase in housing may assist in achieving the desired outcome for the zone, it may not reasonably be said that the proposed development positively responds to the local context.



### Additional Height

Performance Outcome 3.2 provides opportunity for additional height where affordable housing is proposed. The associated Designated Performance Feature provides guidance as to any uplift that may be applied.

**PO 3.2 To support the provision of affordable housing, building heights may be increased above the maximum specified in a zone.**

**DPF 3.2 Where a building incorporates dwellings above ground level and includes at least 15% affordable housing, the maximum building height specified in any relevant zone policy can be increased by 1 building level in the:**

- a) Business Neighbourhood Zone
- b) City Living Zone
- c) Established Neighbourhood Zone
- d) General Neighbourhood Zone
- e) Hills Neighbourhood Zone
- f) Housing Diversity Neighbourhood Zone
- g) Neighbourhood Zone
- h) Master Planned Neighbourhood Zone
- i) Master Planned Renewal Zone
- j) Master Planned Township Zone
- k) Rural Neighbourhood Zone
- l) Suburban Business Zone
- m) Suburban Neighbourhood Zone
- n) Township Neighbourhood Zone
- o) Township Zone
- p) Urban Renewal Neighbourhood Zone
- q) Waterfront Neighbourhood Zone

**and up to 30% in any other zone, except where:**

- a) the development is located within the Character Area Overlay or Historic Area Overlay  
or
- b) other height incentives already apply to the development.

Even if it is established that the proposal is for affordable housing, the uplift is limited to 30% in the Capital City Zone (an 'other zone') which would increase maximum building height from 29 m to 37.7 m, not 46.3 m as proposed.

In the alternative, Performance Outcome 4.2 for the Capital City Zone provides opportunity for additional height, albeit qualified on the basis that the proposal is to *provide for a substantial gain in sustainability*.

**PO 4.2 Development exceeding the building height specified in the *Maximum Building Height (Levels) Technical and Numeric Variation layer and the Maximum Building Height (Metres) Technical and Numeric Variation layer* is generally not contemplated unless:**

- a) the development provides for the retention, conservation and reuse of a building that:
  - i. is a State or local heritage place and the heritage values of the place will be maintained
  - ii. provides a notable positive contribution to the character of the local area
- or
- b) the building incorporates measures that provide for a substantial additional gain in sustainability and it demonstrates at least four of the following are met:
  - i. the development provides an orderly transition up to an existing taller building or prescribed maximum height in an adjacent Zone or building height area on the *Maximum Building Height (Levels) Technical and Numeric Variation layer* and *Maximum Building Height (Metres) Technical and Numeric Variation layer*

- ii. incorporates high quality open space that is universally accessible and directly connected to, and well integrated with, public realm areas of the street
- iii. Incorporates high quality, safe and secure, universally accessible pedestrian linkages that connect through the development site to the surrounding pedestrian network
- iv. provides higher amenity through provision of private open space in excess of minimum requirements by 25 percent for at least 50 percent of dwellings
- v. no on site car parking is provided
- vi. at least 75% of the ground floor street fronts of the building are active frontages
- vii. the building has frontage to a public road that abuts the Adelaide Park Lands;
- viii. where the development includes housing, at least 15% of the dwellings are affordable housing
- ix. the impact on adjacent properties is no greater than a building of the maximum height on the *Maximum Building Height (Levels) Technical and Numeric Variation layer* and *Maximum Building Height (Metres) Technical and Numeric Variation layer* in relation to sunlight access and overlooking.

The proposal does not retain, conserve or reuse a heritage place.

On my review of the report provided by the Applicant, the sustainability elements of this proposal while appropriate and desirable, may not reasonably be characterised as providing a *substantial additional gain*.

As you will hear from others more qualified than me, the sustainability elements of this proposal may be described as routine and little more than that which is ordinarily be required in the normal course of satisfying the Australian Construction Code.

The Applicant has not satisfied this threshold test for additional height, regardless of whether criteria i. through ix. are satisfied. This policy provision anticipates a two step process and may not be 'cherry picked' in isolation.

#### Interface Considerations

The Codes goes onto identify the following provisions with respect to managing the interface with residential uses in the City Living Zone which adjoins the subject land to the east.

**PO 5.1** Development is designed to manage the interface with residential uses in the City Living Zone:

- a) in relation to building proportions, massing, and overshadowing; and
- b) by avoiding land uses, or intensity of land uses, that unduly impact residential amenity (including licensed premises).

**PO 5.2** Parts of a development exceed the maximum building height specified in DTS/DPF 4.1 and adjoin the City Living Zone boundaries are designed to minimise negative visual and amenity impacts to residential living areas and outdoor open space.

**DPF 5.2** Parts of a building above the maximum building height specified in DTS/DPF 4.1 include additional setbacks, avoid tall sheer walls, centrally locate taller elements, and provide variation of light and shadow through articulation.

From the shadow diagrams provided, it is apparent that the residential living areas and outdoor open space of existing dwellings to the east and southeast will be adversely impacted by shadow cast by the proposed development.

While the duration of shadow cast by the proposed building will be limited to the afternoon period, given the compact arrangement of these dwellings and the relatively small areas of open space, amenity impact will be significant.

With respect to visual impact, the outcome will be more profound.

The proposed building form does not adopt measures called for by DPF 5.2. Most specifically, the building does not provide for additional set back, modulation and articulation of elevations (to avoid blank walls) for that portion above 29 m.

Rather, the proposal will project a poorly composed tower 46 m into the sky, with no relief to surrounding development which is of a significantly lower scale and vulnerable to the adverse effects form over height development.

## 5.4 Design

The Code seeks contextual, durable, inclusive and sustainable design.

### DO 1 Development is:

**contextual** - by considering, recognising and carefully responding to its natural surroundings or built environment and positively contributes to the character of the immediate area

**durable** - fit for purpose, adaptable and long lasting

**inclusive** - by integrating landscape design to optimise pedestrian and cyclist usability, privacy and equitable access, and promoting the provision of quality spaces integrated with the public realm that can be used for access and recreation and help optimise security and safety both internally and within the public realm, for occupants and visitors

**sustainable** - by integrating sustainable techniques into the design and siting of development and landscaping to improve community health, urban heat, water management, environmental performance, biodiversity and local amenity and to minimise energy consumption.

While I am not an expert in architecture, the proposal falls well short of these attributes. Apart from some minor embellishments, this tower will present not only an anomaly in this context, but as an unremarkable building of little or no design merit.

I find no meaningful or convincing design rationale within the documents that goes any way to demonstrate that suitable regard has been given to context. This building is not of its place. It displays a scale and form that is clearly at odds with its surrounds.

It is unclear from the schedule provided as to whether an applied finish is proposed to concrete panels. The use of blue glazed bricks for the first 4 floors is also questionable in a context where red brick prevails and certainly does not make for a podium.

The proposal provides minimal, if any meaningful landscaping.

The majority of habitable room windows face south, with little if any shading provided for east and west facing windows. I can only expect that building will be highly reliant on energy consuming air conditioning and artificial lighting.

I am also mindful of the following provisions, to which the proposal falls well short.

**PO 12.1 Buildings positively contribute to the character of the local area by responding to local context.**

**PO 12.3 Buildings are designed to reduce visual mass by breaking up building elevations into distinct elements.**

**PO 12.4 Boundary walls visible from public land include visually interesting treatments to break up large blank elevations.**

**PO 12.5 External materials and finishes are durable and age well to minimise ongoing maintenance requirements.**

**PO 14.1 Development minimises detrimental micro-climatic impacts on adjacent land and buildings.**

**PO 14.2 Development incorporates sustainable design techniques and features such as window orientation, eaves and shading structures, water harvesting and use, green walls and roof designs that enable the provision of rain water tanks (where they are not provided elsewhere on site), green roofs and photovoltaic cells.**

**PO 14.3 Development of 5 or more building levels, or 21m or more in height (as measured from natural ground level and excluding roof-mounted mechanical plant and equipment) is designed to minimise the impacts of wind through measures such as:**

- a) podium at the base of a tall tower and aligned with the street to deflect wind away from the street
- b) substantial verandahs around a building to deflect downward travelling wind flows over pedestrian areas
- c) the placement of buildings and use of setbacks to deflect the wind at ground level
- d) avoiding tall shear elevations that create windy conditions at street level.

**PO 15.1 The visual mass of larger buildings is reduced when viewed from adjoining allotments or public streets.**

I expect the Government Architect will critic these matters in the referral response.

## **5.5 Heritage Adjacency**

As noted above, the subject land is adjacent to several heritage places including the Salvation Army Hostel (the former Bushman's Club) – State Heritage Place 13450. The following policy provisions apply with respect to adjacent development.

**DO 1 Development adjacent to State and Local Heritage Places maintains the heritage and cultural values of those Places.**

**PO 1.1 Development adjacent to a State or Local Heritage Place does not dominate, encroach on or unduly impact on the setting of the Place.**

I expect that the Minister responsible for the Heritage Places Act 1993 will find that the proposed development will have a deleterious impact on the setting of this heritage place due to its close proximity and dominance.



I also think it necessary to consider the heritage character of this locality given the contribution that these heritage places make, particularly as they relate to Whitmore Square which itself is of historical significance in the life of the City.



## 5.6 Access & Parking

While I note that for development proposed within the Capital City Zone, the General Development policies do not seek a minimum provision for car parking. This does not however mean that development may not be provided with on-site car parking.

The practical reality is that a proportion of future residents may choose to have a motor vehicle, particularly those who require independent means of travel to attend employment beyond this locality and where use of public transport is not viable.

The Affordable Housing Overlay acknowledges the practical need for parking.

**PO 4.1 Sufficient car parking is provided to meet the needs of occupants of affordable housing.**

The associated Designated Performance Feature provides guidance in this regard

**DPF 4.1 Dwellings constituting affordable housing are provided with car parking in accordance with the following:**

- a) **0.3 carpark spaces per dwelling within a building which incorporates dwellings located above ground level within either:**
  - i. 200 metres of any section of road reserve along which a bus service operates as a high frequency public transit service<sup>(2)</sup>
  - ii. is within 400 metres of a bus interchange<sup>(1)</sup>
  - iii. is within 400 metres of an O-Bahn interchange<sup>(1)</sup>
  - iv. is within 400 metres of a passenger rail station<sup>(1)</sup>
  - v. is within 400 metres of a passenger tram station<sup>(1)</sup>
  - vi. is within 400 metres of the Adelaide Parklands.



b) 1 carpark per dwelling for any other dwelling.

[NOTE(S): (1) Measured from an area that contains any platform(s), shelter(s) or stop(s) where people congregate for the purpose waiting to board a bus, tram or train, but does not include areas used for the parking of vehicles. (2) A high frequency public transit service is a route serviced every 15 minutes between 7.30am and 6.30pm Monday to Friday and every 30 minutes at night, Saturday, Sunday and public holidays until 10pm.]

Given that Overlay policies prevail over General Development policies in the event of an inconsistency, this development should be provided with a minimum of 0.3 spaces (if one of the provided criteria is met) or a 1 space per dwelling in the alternative.

I can only expect that the additional demand for parking arising from tenants (if not visitors) will lead to further congestion within this locality which is not characterised by generous on street parking opportunities.

Be that as it may, the proposal falls well short of bike parking requirements.

**Within the City of Adelaide 1 for every dwelling for residents with a total floor area less than 150 square metres, 2 for every dwelling for residents with a total floor area greater than 150 square metres, plus 1 for every 10 dwellings for visitors, and in all other cases 1 space for every 4 dwellings for residents plus 1 for every 10 dwellings for visitors.**

On my calculation, 39 bike parks are required whereas only 6 are to be provided.

As noted above, current improvements on the land provide for a cut off to Hocking Place and a line of sight for motorists and pedestrians as they negotiate the laneway to the rear which serves several other properties to the north.



**PO 2.1 Sightlines at intersections, pedestrian and cycle crossings, and crossovers to allotments for motorists, cyclists and pedestrians are maintained or enhanced to ensure safety for all road users and pedestrians.**

**PO 2.2 Walls, fencing and landscaping adjacent to driveways and corner sites are designed to provide adequate sightlines between vehicles and pedestrians.**

The proposal will exacerbate this less than satisfactory situation.

## **6. Conclusion**

From my review, I conclude that the proposal is not an acceptable form of development given significant departure from clearly expressed planning policy and consequent impacts. It should therefore be refused planning consent.

In summary, I am of the view that the proposal:

- may not be considered as *affordable housing* in the absence of specific arrangements;
- is unclear as to the actual use proposed for the ground floor tenancy;
- is of a scale and form that represents a gross over development of the land;
- will not provide substantial gains in sustainability as a prerequisite for additional height;
- is of a design composition that may not reasonably be described as contextual;
- will detract from the established character and amenity of this locality;
- will dominate and detract from the setting of the adjacent State Heritage Place; and
- will give rise to car parking congestion and a potentially an unsafe traffic situation.

As provided for, I seek the opportunity to address the Panel further to this representation.

Yours faithfully

**PHILLIP BRUNNING & ASSOCIATES PTY LTD**



**PHILLIP BRUNNING RPIA**

Registered Planner

Accredited Professional – Planning Level 1

# Is de-concentrating social housing a useful policy to promote wellbeing?

**WELLBEING OF LOWER INCOME RENTERS IS HIGHER WHERE THERE ARE LOWER CONCENTRATIONS OF SOCIAL HOUSING.**

## KEY POINTS

- Social housing is becoming less concentrated in particular areas. Areas are also becoming more tenure diverse, with fewer areas with only home ownership. But with the exception of inner city areas, higher 'tenure diverse' areas have relatively high concentrations of low-income renters (both social and private renters) compared to the average, meaning they tend to be poorer.
- Living away from major urban areas and individual measures of social inclusion and economic security are the strongest predictors of positive social wellbeing.
- Tenure *per se* is not associated with lowered wellbeing but living in high density dwellings is, particularly for social renters.
- Living in areas with lower concentrations of social housing is associated with higher mental wellbeing and satisfaction with safety and the neighbourhood across tenure groups. Moving from areas with high concentration of social rental results in improved wellbeing outcomes. Outcomes are better in areas with moderate tenure diversity.

*This bulletin is based on research conducted by **Dr Sharon Parkinson** at the AHURI Research Centre—Swinburne University of Technology, **Dr Elizabeth Taylor** and **Dr Melek Cigdem** at the AHURI Research Centre—RMIT University, and **Associate Professor Rachel Ong** at the AHURI Research Centre—Curtin University. The research sought to understand whether the social quality of life of lower income renters is better or poorer in areas with high tenure diversity and/or concentrated social housing.*



- The chances of being employed in areas with high concentrations of social housing and high tenure diversity are better for moderate to higher income renters but not for social and lower income private renters.
- Mobility in and out of disadvantaged areas does not increase the chances of being employed in the short-term for those who do not have a job to go to.

## CONTEXT

In Australia, policy-makers have pursued tenure mix policies in local areas to promote social diversity. The assumption has been that social renters will be better off living in the same areas, and often next door to, more well-off neighbours. However, such assumptions are not well tested, nor is there robust evidence that concentrated areas of social housing have an 'area effect' above and beyond the characteristics of those who live there. This study sought to test these assumptions.

## RESEARCH METHOD

Isolating the 'area effects' of high mixes of tenures or concentrations of social housing on wellbeing outcomes (above and beyond the effects associated with the characteristics of individuals selecting into particular locations) requires the use of robust longitudinal multilevel methods. This research employed descriptive analysis and multilevel statistical modelling using longitudinal data from the Household Income and Labour Dynamics in Australia (HILDA) survey merged with recent area data (SLA level) from the Australian Census.

The research focused on four dimensions of wellbeing informed by a *Social Quality* framework including: subjective measures of mental health, satisfaction with safety and with the neighbourhood; and an objective measure of employment participation.

Wellbeing outcomes are examined across all tenure groups with a particular focus on lower income renters living in private rental (who were in receipt of income support and/or falling in the bottom 40% of the income distribution based on

equivalent disposable income) and those renting from a social or community landlord.

Tenure diversity was measured using an entropy score method (maximum diversity is where an SLA has equal representation of all tenure types), while concentrations of social housing measured the proportion of households in an SLA that reside in social housing. Densities of dwelling lived in (from single to multiple story buildings), were also analysed since it was hypothesised that dwelling density might affect concentration of tenure disadvantage for social renters in particular. Finally, area disadvantage was also measured using the Socio-economic index for areas (SEIFA index).

## KEY FINDINGS

### ***Areas are becoming more tenure diverse and social housing less concentrated.***

Between 2001 and 2011 the percentage of areas with very low rates of tenure diversity (i.e. they had mainly home ownership and no rental) declined from 26 per cent to 16 per cent. The average percentage of SLAs with social housing in the 'very high' concentration category dropped from 12.4 per cent to 9.5 per cent. This is likely to reflect both social housing policies of spot purchase in new suburbs as well as the movement of home owners and private renters into areas with the formerly highest concentrations of social housing. The area based mapping also revealed that tenure area diversity is spreading away from the inner areas as more home owners occupy these areas and private renters are moving further outwards into the fringes.

### ***Highly tenure diverse areas and those with concentrations of social housing are on average poorer.***

Areas with high concentrations of social housing tend to be 'poorer' areas and also have high unemployment. Areas with 'moderately high' and 'high' tenure diversity are on average 'poorer', but interestingly, very high tenure diverse areas (mainly in inner city areas which have high income earners and lower unemployment) have slightly higher average income. However, areas

with high concentrations of social housing and diversity do not necessarily equate with areas of overall disadvantage—predominately due to more recent processes of gentrification in the formerly inner urban working class areas.

***Living away from major urban areas and individual measures of social inclusion and economic security are the strongest predictors of positive social wellbeing.***

Living away from a major urban area is the strongest area based measure of wellbeing. Individuals living in major urban areas are significantly less 'happy' and satisfied with both their neighbourhood and safety.

Individual measures of social cohesion, social inclusion and socio economic security are also strong predictors of mental wellbeing, satisfaction with safety and the neighbourhood. In particular, having good social networks lifts wellbeing whilst threats to socioeconomic security, such as financial stress, depress mental wellbeing, satisfaction with safety, and satisfaction with the neighbourhood.

***There is some indication of independent area effects associated with concentrations of social housing and tenure diversity.***

***Satisfaction with safety and the neighbourhood***

Across all tenures, residents' satisfaction with safety and neighbourhood was found to increase with declining concentrations of social housing in the area, which could potentially reflect to some extent the stigma placed on social housing tenants. Social renters living in high density dwellings in particular have lower satisfaction with their safety and neighbourhoods compared with social renters living in detached and medium density dwellings.

Generally, the models indicate that remaining in areas with high concentrations of social housing and disadvantage between consecutive years significantly decreases satisfaction with safety and the neighbourhood. The concentration of social housing may be more influential in residents' perceptions than the overall disadvantage of the area.

***Mental wellbeing***

The mental wellbeing of both *social and especially low-income private renters* declines with highest concentrations of social housing and tenure diversity. Conversely, moderate-to-higher income private renters tend have better mental health when they reside in more diverse areas and those with higher concentrations of social housing.

*Lower income private renters'* wellbeing declines significantly when they remain in areas with a high concentration of social housing and places of disadvantage, and is lifted when they move out of these areas.

The wellbeing of social renters is somewhat 'better' in areas with moderately low area diversity and or concentrations of social housing. Living in a high density dwelling also significantly depresses mental wellbeing, satisfaction with safety, and satisfaction with the neighbourhood.

***Employment participation***

Tenants living in locations of highest concentrated social housing and high tenure diversity often remain within job rich locations with the chances of being employed higher in these locations compared with other areas. However, they may not be the areas that provide job opportunities for lower income renters whose chances of being employed decrease in areas with high concentrations of social housing, especially after longer term exposure.

The move out of a disadvantaged area (and the reverse transition) for those who are unemployed does not lift the chances of employment participation compared to remaining in a better off area. It is not clear whether the same mechanisms are operating in both directions. As we control for those who move for work, such findings could suggest that those who move out of disadvantaged areas may not be moving far from their original areas and may still remain constrained in their job search. Those who move to a disadvantaged area may be moving to more affordable housing rather than in search of employment.

## POLICY IMPLICATIONS

This research shows the need for both individual and place-based policies in promoting wellbeing. It shows that efforts to de-concentrate social housing will serve to improve wellbeing outcomes since few people (even social housing residents themselves) like to be congregated within concentrated social housing estates. This is especially the case in more urban settings and those in high density public housing estates.

The findings indicate that some degree of tenure mix may be desirable and that there is potential merit in policies around de-concentration of social housing and/or aiming for social mix to be more moderated across locations through the provision of affordable housing in the moderately diverse areas. But a pressing concern for policy-makers should also be how to address the needs of low income private renters in the same locations, both through improved access to employment and affordable housing. Localised strategies for urban renewal and land use planning might also help improve safety and neighbourhood satisfaction levels in disadvantaged areas.

## FURTHER INFORMATION

This bulletin is based on AHURI project 53001, *Wellbeing outcomes of low-income renters: a multilevel analysis of area effects*.

Reports from this project can be found on the AHURI website: [www.ahuri.edu.au](http://www.ahuri.edu.au) or by contacting AHURI Limited on +61 3 9660 2300.

[www.ahuri.edu.au](http://www.ahuri.edu.au)



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## Representations

### Representor 61 - John Dow

Name	John Dow
Address	33 Hurtle Square ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 03:13 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> The building is too tall for its location in the square and is out of character with the other residential scaled buildings. Parking for residents and visitors (a problem in other parts of the city) is lacking.	

### Attached Documents

## Representations

**Representor 62** - Alexander Rix

Name	Alexander Rix
Address	54 FIRST AVE ST PETERS SA 5069 ST PETERS SA, 5069 Australia
Submission Date	17/04/2025 03:16 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

### Reasons

The proposed residential development : • Exceeds the maximum building height of 29 metres by some 18 metres, with justifications for additional height regarding sustainability and other matters being insufficient. The ambit claim beyond 30% additional height allowance must be recognised for the cynical ploy it is. • presents unremarkable sustainability credentials, with many elements proposed expected in today's apartment market. The blank northern façade, poor natural light to south facing units and bedrooms within them, plus the extensive use of concrete and aluminium, renders any claim for a higher level of sustainability beyond 'business of usual' void. • Is not informed by the local context, including the lanes, local streets, adjoining City Living Zone, and State and other heritage items; The impact on adjacent properties far exceeds that of a building of 29 metres, in terms of over-shadowing and visual impact through excessive massing; • Is contrary to the desired outcomes of the Heritage Adjacency overlay in terms of height, lack of boundary setbacks, external materials and presentation; • Provides a poor interpretation of the Performance Objectives in having 'no upper level setbacks'; • Does not have a non-residential use at ground level, rather the community space will be used by residents as part of their residential use, and may well be converted to dwellings at a later date; • Has insufficient car parking in practice and should meet at least the 0.3 parks per dwelling standard to avoid further congestion in a locality where parking is often at a premium.. and is therefore seriously at variance with the relevant objectives, policies and principles of the Planning and Design Code and consequently should be refused.

## Attached Documents

Representations

Representor 63 - Sharyn Ingram

Name	Sharyn Ingram
Address	PO BOX 344 PROSPECT SA, 5082 Australia
Submission Date	17/04/2025 03:57 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> Development is 50% higher than planning and design code height limit Breaches pedestrian access bike storage traffic visibility, setbacks, drainage requirements And will not respect neighbours as the code requests it should be lower/step down in form to meet them Sharyn ingram	

Attached Documents

## Representations

### Representor 64 - Lucy Hood

Name	Lucy Hood
Address	84 Prospect Road PROSPECT SA, 5082 Australia
Submission Date	17/04/2025 04:15 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
<b>Reasons</b> Please see document attached, submitted on behalf of local residents in the Adelaide community, regarding the specific reasons they believe current design should be refused.	

### Attached Documents

Lucy-Hood-MP-8-Hocking-Place-Adelaide-1492929.pdf



To the State Commission Assessment Panel,

I write this submission on behalf of CBD residents and businesses, who have contacted me as the Member for Adelaide, to provide feedback regarding Application 24042402.

I acknowledge the importance of residential projects which provide an increase in affordable housing, particularly in the context of a national housing crisis.

However, I also have a responsibility as the Member for Adelaide to listen to the concerns of my local community and ensure I am raising their views regarding proposed developments in their neighbourhood via the relevant public consultation processes.

In regard to Application 24042402, local residents and business owners have raised the following concerns in regard to the 14-storey development at 8 Hocking Place, Adelaide.

### **Height and sustainability**

The height of the proposed development is 46.3m which is above the maximum of 29m.

This does not meet Capital City Zone P.O 4.2 which states: *Development exceeding the building height specified in the Maximum Building Height (Levels) Technical and Numeric Variation layer and the Maximum Building Height (Metres) Technical and Numeric Variation layer is **generally not contemplated**.*

Local residents and businesses who have provided feedback to me state that it fails to demonstrate at least four of the requirements in P.O 4.2.2 relating to a “*substantial additional gain in sustainability*”.

Further, constituents’ feedback raised with me includes that the building’s blank-walled north façade and part sheer-glazed western façade is not energy efficient – and a “*slight on the efforts of its 2004-designed eco-housing neighbour*” (Adelaide Affordable Eco-Housing).

While the Applicant references DO 1 and DO 2 in its submission, it is relevant to note it does not refer to the entirety of DO 2, as the proposed development fails to include “*active non-residential ground level uses to positively contribute to public safety, inclusivity and vibrancy*”.





In addition, I have received feedback that the *“site is too small to enable proper stepping in architectural volumes to pay respect to both immediate neighbours and the locality”*.

Local residents and business owners argue the proposal does not respect:

- the adjacent Adelaide Affordable Eco-Housing (4.5 storeys equivalent) development’s façade heights, materials, textures and character, nor its characterising street verandah.
- the Hocking Lane dwellings, which will be “overshadowed and loomed” over by the development.

While not within the remit of the SCAP in its assessment of the application, it is important to note the challenges being experienced by residents and businesses located on or adjacent to Whitmore Square.

This includes incidences of anti-social behaviour, drug and alcohol abuse, and violence, which currently involves a coordinated effort by SAPOL, the City of Adelaide and Government agencies to try and address. Local residents argue now is not the time to be building over height residential developments in an area of the CBD currently experiencing these increasing challenges.

### **Heritage**

Local residents have raised the lack of a Heritage Consultant Report given the proposed development falls within a Heritage Adjacency Overlay.

The Local and State Heritage listed buildings adjacent the development site include:

- William Booth Home (Local Heritage Place 1601 and part of State Heritage Place 13450) – the two-level red brick building facing Hocking Place; and
- Salvation Army Hostel (former Bushmen’s Club) (State heritage place 13450) – the two-level red brick building facing Hocking Place and the two bluestone buildings.

Feedback provided to me suggests the development fails Heritage Adjacency Overlay DO 1 which states: *Development adjacent to State and Local Heritage Place maintains the heritage and cultural values of those Places* and PO 1.1 that *developments adjacent to a State or Local Heritage Place does not dominate, encroach on or unduly impact on the setting of the Place.*



**Bicycle storage**

The Applicant's own Traffic Consultant report references that under the relevant DTS/DPF criteria relating to bicycle parking, the proposed development fails in its requirement to provide 45 bicycle parking spaces (comprising 36 resident spaces and nine spaces for visitors).

Instead, the proposal will only provide a total of six spaces within a secure bicycle room on the ground level for resident and visitor use.

An additional six visitor bicycle parking spaces are proposed within the public verge adjacent the subject site on Whitmore Square; however, this is subject to Council consent. Therefore, the development is well below the required bicycle parking, with the traffic consultant suggesting residents store bicycles within their dwellings and on balcony areas.

Thank you for considering the concerns of my local community.

If you wish to discuss this submission further, I can be reached on 8269 1838 or [adelaide@parliament.sa.gov.au](mailto:adelaide@parliament.sa.gov.au)

Yours sincerely,



**Lucy Hood MP**

**Member for Adelaide**

17 April 2025



# Representations

**Representor 65** - Nirmith Bhargava

Name	Nirmith Bhargava
Address	12/25 Norman Street ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 04:58 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> Leave the heritage Adelaide and fix the existing problems first. The city is always going through constructions which never complete.	

## Attached Documents

## Representations

**Representor 66** - Donald Wilson

Name	Donald Wilson
Address	U514/52 Sturt street Adelaide ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 05:00 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I support the development with some concerns

### Reasons

The key to housing such as this is the management of tenants. This has a single entry point for all tenants. We have had the unfortunate experience over the last ten years with the tenants of Rietz Close at 66 Sturt Street which became uncontrolled, violent, noisy and unsafe. It is now being re-developed. I believe from reading about this that the developers have some experience with Common Ground facilities in Light Square. This building works very well and is well-managed. If the same happened here then it would be a good solution to a housing problem for low-income earners. If it is allowed to deteriorate such that the worst of the tenants affect all others (because they all have to share entry points) and aggressive people who are associates of tenants are allowed to cause damage then it will deteriorate. Rietz Close had constant damage, graffiti everywhere, people getting injured, one murder and so on. It was a hell-hole and gradually moderate tenants shifted out. If there can be a sense of community in the building such that the community controls the behaviour and has the clout to call out those who damage or deface it then it will succeed. This would need to be backed up by some organisation that can act when it needs to. That would be my main concern if I was living nearby. We are getting new tenants into Reitz Close after it has been refurbished. We have reached out to help those who move in to create a community when they arrive. Previously we felt unsafe even walking past it. Attempts by us to clean up the exterior were abandoned eventually as the tenant mix got worse. We had bottles thrown at us as we were cleaning up. The height of the building reminds me of Tom's Court hotel which looks totally out of place, but I cannot oppose anything that brings new people into the city and increases population and services. I am fatalistic enough to say that we cannot and should not stop the tide in this regard.

## Attached Documents

## Representations

**Representor 67** - Anna Trotta

Name	Anna Trotta
Address	31 Russell St ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 05:27 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

The height of the proposed devt is excessive to the local area and another stall skyscraper obling block creating a new eyesore! And massively overlooking all the houses and neighbours for blocks!! Much like the other multi story underused tall building at the other end of the square . These are very ungreen and visual eyesores. There is no provision for natural outdoor space for people to live long term within then without the or more community forms of living . It has no environmentally energy efficient qualities re solar efficiency for that many air conditioners that will be required. Much like other towers they are not catering to Australian . citizens living and working fulltime there This kind of building tends to be overseas owners parking their funds as an investment and intermittently renting them or leaving them empty !! Overall it doesn't benefit local citizens it local needs . It is another ugly eyesore that was never specifically designed for Sth Australian climate or lifestyle . It is another climate defying energy draining unnatural building that doesn't sit or fit in its environment!

## Attached Documents

# Representations

## Representor 68 - Eilidh GREENSHIELDS

Name	Eilidh GREENSHIELDS
Address	Unit 25/56 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 05:31 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

To the State Planning Commission, Re: Proposed Development at 8 Hocking Place, Adelaide – Planning Objection As a long-term resident living in next door to the proposed development at 8 Hocking Place, I am writing to formally raise my concerns and object to the proposal in its current form. While I support the intent of increasing affordable housing and improving the social fabric of our city, I believe that this particular development raises a number of issues that will negatively impact the surrounding community, especially those of us living nearby.

1. Lack of On-Site Parking The complete absence of on-site car parking is concerning. While the report argues that residents of social housing may not own vehicles, this is an unfair and demeaning assumption on those in need of social housing and overlooks the fact that visitors, and other services will still require access. Hocking Place and Square's corner is already narrow, under pressure, and lacks adequate on-street parking. Adding this development without parking will worsen congestion and increase illegal or unsafe parking practices.

2. Impacts on Light Access Although the Report argues there will be no significant overshadowing or overlooking, it's clear from the shadow diagrams that sunlight and open-sky access for adjoining properties will be affected, particularly during winter months when access to natural light is most critical. Furthermore, the upper-level balconies create direct sightlines into neighbouring properties, compromising privacy and potentially posing safety concerns, such as the dropping or throwing of objects from height.

3. Community Safety and Anti-Social Behaviour There is already a well-documented and ongoing issue with anti-social behaviour at the corner of Hocking Place and Whitmore Square. Residents regularly witness public intoxication, drug use, and aggressive behaviour, which contribute to a genuine sense of insecurity and discomfort, particularly after dark. Adding a high-density residential building — particularly one intended entirely for social housing — to an area already under significant social strain risks compounding these problems. Without a clear and transparent plan for on-site support services, long-term tenancy management, and community safety strategies, this development may unintentionally intensify existing issues, making the area less safe for both new and existing residents. Rather than alleviating local challenges, the proposal as it stands could tip the balance further, creating a concentration of complex needs in a pocket of the city already struggling with under-resourced social infrastructure.

4. Unclear Public Benefit and Ground-Level Use The design includes internal communal areas for residents but lacks clearly defined spaces that contribute to the public realm. Without active street-level engagement — such as community or commercial uses — it's hard to see how the development will deliver on its promise of improving vibrancy or supporting broader neighbourhood activation.

5. Lack of Transparency Around Building Management The proposal leaves key operational questions unanswered:

- How will the building be managed and maintained over time?
- Will there be embedded support services for residents?
- How will the needs of tenants with complex challenges be supported in a high-density environment?

These unknowns increase uncertainty for existing residents and raise the risk of poor oversight, inadequate maintenance, and long-term deterioration — all of which directly affect neighbouring properties.

Conclusion While I acknowledge the city's need for more affordable housing, I do not believe this proposal represents a balanced or contextually appropriate solution. Thank you for the opportunity to provide input. Kind regards, Eilidh Greenshields

## Attached Documents

## Representations

**Representor 69** - Phil Harris

Name	Phil Harris
Address	28 East Tce ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 06:25 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development
<b>Reasons</b> Please refer attached docs	

## Attached Documents

1_Cafe-Troppo-and-Troppo-Architects-REPRESENTATION_8-Hocking-Place-1492949.pdf
2_Cafe-Troppo-and-Troppo-Architects_Appendix_Locality-1492950.pdf
3_Cafe-Troppo-and-Troppo-Architects_-Appendix_Design-Assessment-Diagrams-1492951.pdf
4_Cafe-Troppo-and-Troppo-Architects_Sustainability-Reviews-and-Sustainability-Assessment-Frameworks-1492952.pdf
5_Cafe-Troppo-and-Troppo-Architects_Heritage-and-Urban-Design-1492953.pdf



A representation from:

**Café Troppo**

42 Whitmore Square/ Iparrityi, Adelaide

**Troppo Architects**

28 East Terrace, Adelaide

**Author: Phil Harris**

Co-founder and Director, Troppo Architects

Fellow of the Australian Institute of Architects

Registered Architect SA, NT, Vic, Tas, NSW, Qld

Adjunct Professor, School of Architecture and Civil Engineering, University of Adelaide

2008 AIA(SA) President's Medallist

2010 Global Sustainable Architecture Award laureate

2014 AIA Gold Medallist

Gardener and Proprietor, Café Troppo

Troppo Architects are:

- Australia's 4<sup>th</sup> most awarded architectural practice (ever), with offices in Adelaide, Darwin, Sydney, and visiting offices in Launceston, Byron Bay and Perth; and are
- Architects to the adjacent Ecohousing site, 42-56 Whitmore Square (designed 2007)

Café Troppo is:

- winner of AIA(SA)'s City of Adelaide Prize
- winner of the Civic Trust of SA's urban design award
- winner of The Advertiser's Adelaide's Best Café
- listed since 2016 in the Lonely Planet Guide
- proudly on the Square (not Grenfell Street) since 2012

Concerning:

**PROPOSED 14 STOREY DEVELOPMENT AT  
8 HOCKING PLACE, IPARRITYI/ WHITMORE SQUARE  
APPLICATION ID: 240042402**

17.4.24

The following is our representation.

It includes appended diagrams and reports:

Locality

Design Assessment diagrams (including for overshadowing and overlooking)

Sustainability reviews

A Review of Sustainability Assessment Frameworks

Douglas Alexander, Heritage Consultant Report

## Introduction

From the passing public eye, this site can bear 5 storeys not 9 not 14.

From the perspective of overshadowed and overlooked and overborne neighbours it must be a 'no' to 9 storeys, let alone 14. However, from our investigations, a development of 5 storeys exhibits decent manners.

From a development perspective its build cost/ m2 will make no return-on-investment sense, unless it is on-sold, unbuilt with an expanded height approval.

Locality, orderly development and good civic manners, including toward adjacent an awkwardly situated Heritage items, says create a responsive building form, not a sharp edged massive box, and keep it down – again 5 storeys.

I elaborate...

## Zoning

This site sits on the Capital City/ City Living cusp – but from it's gung ho-ness you'd think it was development for a site surrounded by 'talls' in the middle of Capital City zone.

*This is a site of transition – and development upon that should reflect that characteristic.*

This proposal illustrates 'no respect' for its immediately adjacent and wrapping City Living Zone.

City Living has a 8.5m height (3-storey max) planning context – as, for example, describes the dwellings that reside within it, including in adjacent social housing and on Gilbert Street.

This proposal's *locality* is, in the majority, City Living.

## Heritage adjacency

An overlay for this site is 'Heritage Adjacency', yet there is no Heritage Consultant's reporting to guide this proposal.

The site sits adjacent State and Local Heritage items, now combined in a Salvation Army community service operation. Their history dates back to the Colony of SA's second, 1838 appointed judge, Samuel Cooper for whom Cooper Creek is named (but sadly no brewing connection). His dwelling here was extended to provide Adelaide with its *first* courthouse. The now nobly connected site was next taken up to deliver town comfort for visiting pastoralists – the Bushmen's Club, of which the site's now State listed ironstone flanks are now remnant. The site offers great future interpretive opportunity, and no doubt will become a feature of a (surely) eventual redevelopment of the wider Salvo's site (through to Morphett Street).

Being aghast at the rudeness of scale, overshadowing and adopted materiality in relation to these items. We have retained the eminent Adelaide Heritage Architect, Douglas Alexander to more professionally elaborate on our immediate response, to take us beyond 'its just the vibe'.

From Mr Alexander's report, it is evident that this development is totally disdainful of the heritage items.

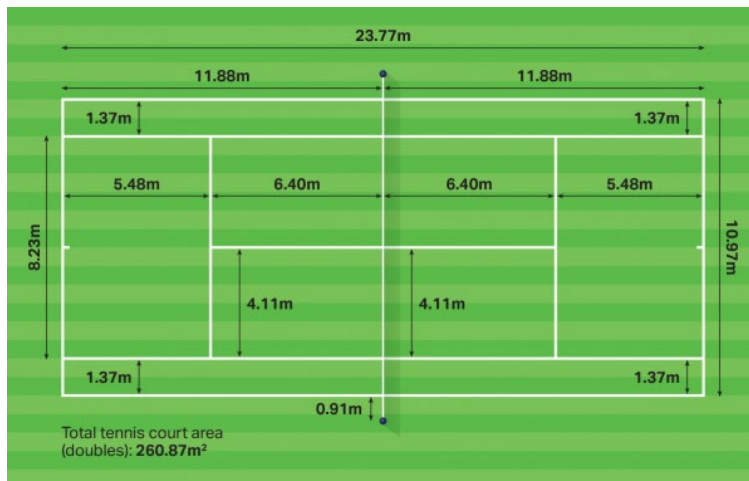
We also append a wider view of heritage and storey telling in the Square – refer 'Locality'.

### Site size

8 Hocking:  $9.14\text{m} \times 27.43\text{m} = 250.7\text{m}^2$

Tennis court\*:  $10.97 \times 23.77 = 260.77\text{m}^2$

\*without curtilage



### Architectural character for this Place

The drawings refer to "Place: A mix of styles and types"

(\*types of what?)

The drawings refer to "Place: Rich with ingredients".

The inference here is that there are no themes – and, therefore, 'anything goes'.

The design drawings are collectively named a "Design Response". The design clearly adopts:

- 'anything goes', and
- why not add in something that's not there at all – a very tall thin and glary white box.

As such, the only response we can see here is one of *arrogant disregard* for locality.

To detail our professional view further...

There are no streetscape drawings provided for along the Square, Hocking Place, nor the Rear Lane – disappointing that an application can be shepherded to this point without those. Nevertheless, from our own investigations (and ref our 'Locality' attachment)...

In submitted elevations, the proposal's immediate northern and southern neighbours are:

- Only part (not even 25%) drawn
- In unintelligible outline
- Without reference to filigree/ patterning, texture or colour

Yet, to the Square, they are clearly important buildings – not to mention by heritage listing, national and state architectural notice/ awards.

The adjacent Hocking Place social housing buildings are notable in their decent design, elegant simplicity and uplifting use of colour. It is pleasing that the brick type and buff contrast from those structures is adopted in the subject proposal.

But that does not assist fit with the Square...

Yes there is indeed diversity going on around Iparrityi/ Whitmore Square and Hocking Place, but **there are themes!**

A study of the Square undertaken in 2012, just ahead of the construction of Boheme, was undertaken by Troppo Architects with due reference to all Council, State Government, Heritage Agencies reports, histories, surveys and historic panoramas. This has been reviewed and updated for this locality, being extended to include Hocking Court. It is appended as 'Locality'.

This work serves to identify the locality themes. It consolidates their existence.

It is a shame that this proposal neither explicitly references adjacent architectures, and most importantly the evident architecture of the Square, an element of Adelaide's much loved and nationally heritage listed Parklands. Its 'Parklands face' offers, after all, a potential doorway to height uplift.

The contextual impacts of overshadowing, overlooking and visual impact are discussed further on, herein.

## Height

Sections (and therefore nominated building height) show the floor slab contiguous with adjacent footpaths. The civil drawings show a general 100mm rise – but we note, to obviate flooding:

- Weird inward internal falls at the transformer/ bins/ rear lane interface – in final documentation this area will end up lifting
- Ecohousing/ Café Troppo experience with due regard for Sturt Street stormwater says 200mm a more likely floor slab height above adjacent paving
- Hocking Place collects all water from the wending lane world and *its surface water flow* behind (Hocking Court/ Hocking Place through to Gilbert Street. There is no in-ground stormwater through this locality.

Although noted on the roof plan, **no lift overrun is shown in section/ elevations/ model views/ heights calcs** > add 4.5m – 1m within the indicated parapet zone = nett +3.5m > 46.3 + 0.2 + 3.5 = **50m** overall in that zone. That's **72% over** the 29m height limit.

And:

- **Nor are pv panels on inclined frames shown**, which will add another 1m above the ridge height for the whole roof run > 46.3 + 0.2 + 0.7 = 47.5m general overall max height.
- Other rooftop plant seems to have gone missing...
- Mechanical services;
  - o a probable requirement for the central airless/ lightless corridors.

- Mechanical services will also be required to pressurise the 2 (independent) sets of stairs.
- Hot water service – for an energy efficient all-electric development, heat pumps will be required. For best performance and no space anywhere else anyway – again these will need to be roof mounted, potentially 2m tall.
- Footprints and access space around from all of these items will reduce available roof for solar panels.
- Perimeter fall protection barriers will be required for the extent of solar panels and any rooftop plant – but will likely sit lower than the pv panels (on frames) themselves, and the plant (just).
- Glass cleaning – how will that be arranged, especially for the top 3 levels and anything above portable cherry-picker height? We foresee roofmounted jibs which will add to the sense of height.

#### Where's a Service's engineer's report?

Maths check:  $13 \times 3.2 = 41.6 + 4 \times 0.7 \text{ parapet} = 46.3 \text{ (check)} + 0.2 \text{ to ground floor level}^{**} + 1 \text{ m for pvs over} > \mathbf{47.5m}$

We believe the building height to be constructed will be:

- Generally 1.2m higher than that stated > not 46.3m, but **47.5m**
- For 10% of its footprint (in the lift over-run area) 3.7m higher than that stated > **50m**

And there really is no potential to reduce floor/ floor heights. The 4m ground floor height allocation is required by the NCC; and upper level heights have no give...

#### Ceiling height

The general 3.2m floor/ floor height is considered tight with due consideration for structure and services, including the passage of water and stormwater pipes, and able to deliver a 2.4m ceiling height. Although dwelling unit areas are only small, the question is how ignoble is that – would that cut it for your or my apartment? Are ceiling fans proposed?

*Bob Ellis, author and political commentator, in discussion with Richard Fidler on ABC Radio (2014) advised of his '10 vital laws of life'. Number seven was:*

*"Human happiness increases with the height of ceilings."*

And, over a low rise, how much will temperature gradient impact thermal comfort in summer (giving cause to flick the air con switch)...

Will a height increase be further sought as variation to any approval to better accommodate taller ceilings?

#### Approving an uplifted height

According to the Planning and Design Code, approving a height uplift rests on the delivery of a) or b) in this boxed text (over).

Our grey highlights denote ‘irrelevance’ or ‘fail’:

Development exceeding the building height specified in the *Maximum Building Height (Levels) Technical and Numeric Variation layer* and the *Maximum Building Height (Metres) Technical and Numeric Variation layer* is generally not contemplated unless:

- a) the development provides for the retention, conservation and reuse of a building that:
  - i. is a State or local heritage place and the heritage values of the place will be maintained
  - ii. provides a notable positive contribution to the character of the local area

or

- b) the building incorporates measures that provide for a substantial additional gain in sustainability and it demonstrates at least four of the following are met:
  - i. the development provides an orderly transition up to an existing taller building or prescribed maximum height in an adjacent Zone or building height area on the *Maximum Building Height (Levels) Technical and Numeric Variation layer* and *Maximum Building Height (Metres) Technical and Numeric Variation layer*
  - ii. incorporates high quality open space that is universally accessible and directly connected to, and well integrated with, public realm areas of the street
  - iii. Incorporates high quality, safe and secure, universally accessible pedestrian linkages that connect through the development site to the surrounding pedestrian network
  - iv. provides higher amenity through provision of private open space in excess of minimum requirements by 25 percent for at least 50 percent of dwellings
  - v. no on site car parking is provided
  - vi. at least 75% of the ground floor street fronts of the building are active frontages
  - vii. the building has frontage to a public road that abuts the Adelaide Park Lands;
  - viii. where the development includes housing, at least 15% of the dwellings are affordable housing
  - ix. the impact on adjacent properties is no greater than a building of the maximum height on the *Maximum Building Height (Levels) Technical and Numeric Variation layer* and *Maximum Building Height (Metres) Technical and Numeric Variation layer* in relation to sunlight access and overlooking.

Now, whilst...

**a)** is irrelevant in this case, the site not including a heritage item, the *spirit* of this provision that may enable uplift is:

i): ‘look after a heritage item’ – *but with awesome overbearing and overshadowing that’s not happening here*; and

ii): then provide decent presentation/ public realm as part of such care – *but no such ‘give’ here*.

In this proposal...

**b)** is the approach that appears to be pursued; and this demands ‘*substantial* additional gain in sustainability’ + *at least* 4 other measures being addressed.

Our assessment is, despite the proposal’s otherwise claims, that this is *at best* a *very average* effort toward sustainability, with all-too common greenwashing, predicated on air-conditioning

and sealed boxes in a (tall, wind-catching) building format and noisy site that says 'shut the windows'. It falls well short of the required *substantial* gains for our community (and planet).

Rather, a project that adopted best solar passive design, strenuously incorporated low-embodied energy in its material and construction systems, and meaningfully harvested rainwater and the power of the sun to offset use, might offer substantial gains. One that neared carbon neutrality might illustrate this even moreso, and one that pursued regenerative design philosophy even moreso again.

A more serious Sustainability rating system would serve to guide decent sustainability approach. This project's sustainability reporting relying primarily on NatHERS and its stars is a lowest common denominator approach, considering only a narrow band of sustainability measures.

In this representation we include 3x pointed assessments from internationally practicing, esteemed Sustainability experts – refer 'Sustainability Review in our attachments.

We also elaborate on our assessment below.

In any case, of the 9 provisos in the P&D Code's boxed text above, a tallying of the *minimum* 4 for success isn't achieved.

We also elaborate on those failures in the following...

## Sustainability

The Planning & Development Code provides guidance on for what might be acceptable (minimum) sustainability for the next door City Living zone, the sites that wrap this development proposal – and for this cusp Capital City zone...

City Living:

PO 4.1

Buildings are sited and designed to maximise passive environmental performance and minimise energy consumption and reliance on mechanical systems, such as heating and cooling.

PO 4.3

Buildings incorporate climate responsive techniques and features such as building and window orientation, use of eaves, verandahs and shading structures, water harvesting, at ground landscaping, green walls, green roofs and photovoltaic cells.

Capital City:

DO1. Development is:

- a) contextual - by considering, recognising and carefully responding to its natural surroundings or built environment and positively contributes to the character of the immediate area
- b) durable - fit for purpose, adaptable and long lasting
- c) inclusive - by integrating landscape design to optimise pedestrian and cyclist usability, privacy and equitable access, and promoting the provision of quality spaces integrated with the public realm that can be used for access and recreation and help optimise security and safety both internally and within the public realm, for occupants and visitors
- d) sustainable - by integrating sustainable techniques into the design and siting of development and landscaping to improve community health, urban heat, water management, environmental performance, biodiversity and local amenity and to minimise energy consumption.

PO 1.1

Buildings reinforce corners through changes in setback, articulation, materials, colour and massing (including height, width, bulk, roof form and slope).



PO 1.2

Where zero or minor setbacks are desirable, development provides shelter over footpaths (in the form of verandahs, awnings, canopies and the like, with adequate lighting) to positively contribute to the walkability, comfort and safety of the public realm.

PO 1.3

Building elevations facing the primary street (other than ancillary buildings) are designed and detailed to convey purpose, identify main access points and complement the streetscape.

PO 3.1 Soft landscaping and tree planting is incorporated to:

- a) minimise heat absorption and reflection
- b) maximise shade and shelter
- c) maximise stormwater infiltration
- d) enhance the appearance of land and streetscapes
- e) contribute to biodiversity.

PO 4.1

Buildings are sited, oriented and designed to maximise natural sunlight access and ventilation to main activity areas, habitable rooms, common areas and open spaces.

PO 4.2

Buildings are sited and designed to maximise passive environmental performance and minimise energy consumption and reliance on mechanical systems, such as heating and cooling.

PO 4.3

Buildings incorporate climate-responsive techniques and features such as building and window orientation, use of eaves, verandahs and shading structures, water harvesting, at ground landscaping, green walls, green roofs and photovoltaic cells.

Zero to few of those laudable and easily understandable planning 'box ticks' are delivered by this proposal.

Rather, it seems, in an attempt to substitute for the fails under the planning requirements, the proponent has pursued a different path in seeking approval for a raised sustainability outcome that is tied up in greenwashing blather. We refute that approach...

Contrary to the claims of this proposal, and in particular its Sustainability Report, this is **not** a best (or even half-decent) practice Ecologically Sustainable Development. The summary of the proposal's approach to Sustainability within the drawings set is assessed and generally refuted in our attachment 'Sustainability Review'.

In brief, failures of the proposal in this way include:

- Sunless south-facing apartments
- Inadequate western sunshading
- North wasted, despite adjacent Ecohousing politely stepping back for that solar access
- No cross ventilation possible with the enclosed central corridor (though much talk about ventilation)
- Daylighting is dismal to a significant portion of each floor plate
- ...because height is above 25m, 2x air balanced firestairs are required (with consequent energy use for mechanical systems)
- 6 bikes for 36 units/ 42 double beds/ 84 people must be some kind of joke
- A 10k litre rainwater tank is reported (but not integrated in plans), equivalent to 1/6<sup>th</sup> of a 3-bed house's lean needs > ie. enough for 1x 1-bed unit out of the 36 proposed here
- PVs = 57/ 15kW, which is potentially enough for 3x 2-bed energy-efficient (but air-conditioned) houses – call it 6x 1-bed units in this case ie. provision for 1/6<sup>th</sup> of demand from dwelling units, and prob 1/8<sup>th</sup> overall with consideration of public spaces, lifts, mech stair venting, centralised hot water, security and automation systems
- ...and as below, with plant omissions from the rooftop this figure is likely to significantly reduce. Maybe at best 1/10<sup>th</sup> to 1/12<sup>th</sup> of power demand might be met
- Pissant green-ness (sunburnt planters at level 4 edge); zero biodiversity support



- No reference to embodied energy in this very concrete (frame and cladding) building (not to mention glazed brick, glass, aluminium) – and...
- A significant amount of that embodied energy goes in the massive construction firestair/ lift – which serves a maximum of only 3 dwellings/ level – on a larger site, 6 units might group, halving the proportionate mass attribution to each dwelling

Having failed to tick the box on P&D Code sustainability requirements, it's because of some supposed star-rated excellence in 'sustainability' that extra height is being sought.

Our expert 3x eminent expert consultants advice on the star-rating achieved, and the merit of that as a stand-alone means of measuring sustainability are appended. That collective advice hugely refutes the proposal's claims.

Particular points to further elaborate on...

### ***Stairs vs lifts***

Stairs can help keep you fit – and climbing stairs demands zero energy input (after the muesli bars). However...

These firestairs are not inviting: and with 10 levels above the more readily climbable first two rises, that's a huge proportion of building users employing energy to get home. A 5-storey development, with a friendlier stair arrangement and only 2/5<sup>th</sup>'s of the building above the easy climb. A single (and smaller, lighter, still regenerative) lift would result, with much lower energy use.

### ***Hot water***

The nature of the proposed hot water service is not discussed in the proposal, but it is presumed to be electric – which will demand roof-mounted plant (not shown).

### ***Rainwater harvesting***

Rainwater harvesting, usually a base tenet of a sound ESD approach is not seriously taken up in this proposal – rather the Sustainability report refers to 10k litres of rainwater tank(s). But the Stormwater report refers to detention-and-discharge tanks only.

With 250m<sup>2</sup> of roof, conceivably a 5-storey (say 8 unit + commercial space) building could run either its drinking water or (say) its toilets flushing from harvested rainwater, perhaps stored in a basement. But a 14 storey building has no hope.

We presume over-development here precludes the adoption of rainwater harvesting.

### ***Daylighting***

Excellent daylighting is claimed – but this is not so. Refer appended diagrams illustrating areas with zero/ under-decent daylighting. The highlighted areas are express as a proportion of habitable enclosed area, for each level (> 'Design Assessment Diagrams'). In summary:

Of habitable enclosed areas:

Level 1:	14% 0 daylight + 25% inadequate daylight
Levels 2-10:	17% 0 daylight + 7% inadequate daylight
Levels 12-14:	14% 0 daylight + 1.5% inadequate daylight

Without 2 stairs and 1 lift – ie. a 9 storey development – a much better proportion of decent daylighting would be delivered overall, with a central area freed up for solar access to the central corridor daylight – and controllable solar gain.

A scheme that stepped back over 5 storeys/ reduced unit numbers per floor would do even better.

### **Ventilation**

Ventilation to dwelling units is important for thermal control, but also for wider health and well-being, and as such should be *democratically controlled* – yet there is (vague) talk of automation, to drive energy efficiency.

There is no natural ventilation to the landlocked central corridor and stairwells.

And because those spaces are land-locked there is no cross-ventilation available to any dwelling unit, save the upper 3 levels, but...

*Of course the taller the building the less able is one to open a window.*

Where is the Wind impact Assessment Report, not only for pedestrians at the ground plane in the locality, but for higher level balconies – and ideally the design/ feasibility of operable windows within this development?

The Sustainability Report's claims around better-than-average ventilation are spurious at best.

Of course a much lower, say 5-storey development, commensurate with the scale – and *shielding of neighbours* – would not have these outcome-diminishing issues.

### **Health/ mental health**

For best health including mental health, biophilic design, fresh air, quality daylight, outlooks and sky views are all important.

This proposal is highly sealed – and as discussed below under Acoustics – will be so for more than the usual premises.

Claustrophobic post-Covid-traumatic central corridor.

Importantly, the overshadowing/ overlooking/ overbearing nature of the proposal will have negative mental impacts on neighbours left sitting in its lee – and from our overshadowing and visual impact diagrams (appended), these neighbours will be rather far-flung!

A 5-storey development would not have this social impact.

### **Sustainability and structural engineering/ construction systems**

ESD is not about dressing up the always visible elements of a building, it should go to a project's very bones...

*For example, the UK measure 'SCORS' has been adopted in the structural engineering of the newly opened Flinders Chase Visitor Centre to guide and verify a reduced carbon footprint or the development in that respect (within a wider suite of ESD measures). SCORS is a measure*

*described in our appended 'ESD Frameworks Review'. This process has recently been nationally awarded.*

In this proposal, there is no such consideration – and indeed there is no structural engineering reporting at all, including for geotechnical reporting to assess and best respond to ground conditions.

### **Running cost**

The Sustainability Report claims an approach that delivers a low running cost. But this is not so. Aside from poor solar passive design and consequent reliance on air conditioning...

- Mechanical systems will be 24/7 for the stairs and land-locked corridor
- Lighting to same 24/7
- Automation will have faults and servicing need, and to some extent will be anti-democratic, ie. beyond personal control for cost
- There will be lifts servicing
- There will be fire sprinkler servicing
- Public facades/ realm maintenance will be required (rough sleeping/ human waste clean-up, rubbish, graffiti, building damage)
- Will off-site storage and carparking be required by at least some tenants?

...Somehow, across the diverse things, users will pay.

### **More holistic measures of sustainability**

As we've already stated, uplift should only be possible by compliance with *best contemporary and future-leaning standards* that strive toward a minimum decent/ total Carbon offset – and ideally Regenerative outcomes.

We append (refer 'A Review of Sustainability Assessment Frameworks') a summary of some more holistic sustainability guiding and assessment frameworks that are readily available – and iterate that no such framework – a more comprehensive framework – is not taken up here in any meaningful way. The proposal rests on a mere NNC-compliant NatHERS assessment.

### **Acoustics**

The last (why last?) 'Sustainability' page in the drawings set claims 'best practice acoustic performance', without any detail; and we note that there is no Acoustic Engineer's report. It is not known whether noise transmission in or out, or the acoustic quality of spaces is being referred to. If it's to do with transmission in...

The Sustainability Report claims thermal double glazing.

Thermal and acoustic double glazing are not one in the same – and there will need to be a compromise to tip one way or the other in the final specification.

Whitmore Square/ Morphett Street is a 2-lane sub-arterial road, with attendant traffic noise.

The locality is also prone to late night street arguments, drunken-ness, violence, *ie. noise, and resultant noise complaints* (ref SAPOL, Adelaide City Council and local residents/ businesses). To some extent this is a product of various social programs accommodated around the Square.

The Sustainability Report suggests there is good ventilation – which is disputed – we'd say minimal and no cross-ventilation (landlocked central corridors). In any case, whether thermal/ acoustic quality, they'll be shut for noise.

Finally, we note that *all* units are street facing. By way of comparison at Ecohousing internal mews are created for 75% of dwelling units, these turn away from the street (and offer up northern solar access, and a fine-grained sense community).

Less units/ level that oriented northward would turn away from noise sources, but that requires removal of a stair and lift – a product of exceeding 25m effective building height.

## **Public realm**

There is no public realm 'give' in this proposal – and yet favours are being sought.

As a minimum, it would be good to uplift the ground texture of Hocking Place – which is:

- more pedestrian than vehicle-trafficked – and this scheme is theoretically all about foot and (6) bicycles traffic; and
- a threshold to a State Heritage item

One would have thought that social housing should be presented as specially as housing generally.

Instead, all we get is a stormwater sump in the footpath to trip over.

(By comparison, the adjacent Ecohousing (also an affordable housing project) integrated street landscaping and generous street verandahs.)

There is no adequate verandah shelter to the site's southerly weather-side – and primary entry side. Not publicly minded.

The proposal is boundary to boundary building, with the exception of a 1m sliver removed to the ground floor and two pissant indents to create a sort of eave to the main Hocking place side entry. Decent (wider) cutback at the ground plane might have delivered improved presentation of the highest level importance components of the heritage items adjacent, also have been worked to better 'announce' Hocking Place and its ensuing and potentially charming 'lane world' (worth a wander).

## **Ground level activation**

There is no café, no shop, no office space, no commercial tenancy afforded the Square or Hocking Place. The rear Hocking Place/ Lane neighbour gets only a transformer and bins.

Communal lounge does not open to its public faces in any broad and inviting way, should the Whitmore Square world be invited in (likely?)

Yet...

The Planning & Design Code requires for uplift in height for activation not be delivered. Our review (attached0 shows:

Less than the 75% required for height uplift – using what is shown for:

- the Square and Hocking Place faces > 68% proposed
- all the 3 street frontages (the technically correct measure) > 56% proposed

Furthermore:

Not shown items that will also reduce available façade:

- letterboxes
- fire booster allocation likely under-represented
- structure – much seems missing
- vertical stormwater runs/ connections

The < tennis court size of this site again precludes an acceptable outcome for uplift.

## **Carparking**

From any common sense measure, that's an inadequate Traffic and Carparking report! Yes, traffic is as stated. But carparking is inadequately reported. Yes, there is no requirement of on-site carparking, but there is such a thing as:

- some low-income people do have cars/ motorbikes (often their most treasured possession)
- there will be service providers
- there will be visitors...

This development has serious impact on carparking the locality:

- this is a cusp site (with City Living)
- the locality is impoverished in on-street parking (by comparison with city grid more centrally)
- there are no immediately available public car parks

'Lane world' – Hocking Place, Evans Place, Hocking Court, Faulkner Place and Considine Place – connects with the Square past this site. All streets are narrow.

And it's a cut-through for the good folk of Gilbert Street.

Within Lane World there are a mere 3 (small) on-street car parks.

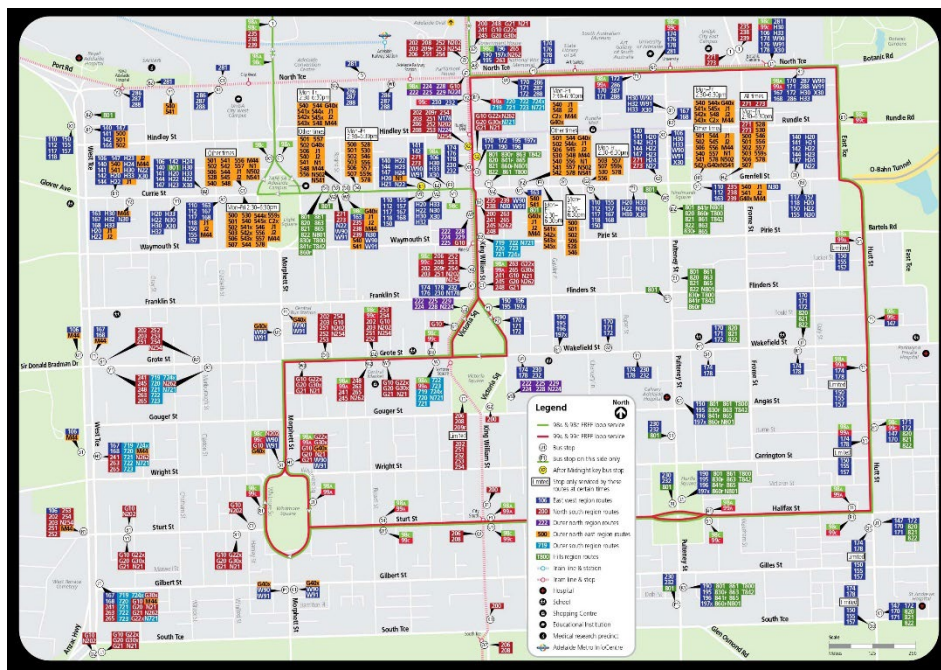
The groin of the Square at the Hocking Place junction reduces carparking in front of the subject to one space.

Near Morphett Street has only 2 on-street car parks to add to those (all spatially inefficient parallel parks) on the Square.

There is no on-street motorbike parking amongst the above.

Suffice to say a locality fitting 5-storey development would have way-diminished carparking impacts.

And, as to public transport availability, by comparison Capital City zone generally – well, we're really fringe for access:



## Overshadowing

The application includes only minimum overshadowing diagrams, leaving out the equinoxes altogether – and to paint a picture, it's the equinoxes that best tell the average yearly story. It's not a pretty picture – refer our appended diagrams in 'Design Assessment Diagrams'.

We note the impact includes overshadowing of backyards and roof tops through to *Gilbert Street*, as well as the *Heritage items adjacent*.

The uplifted 14 storey development clearly exceeds the impact of a 9 storey development.

Good neighbour 5 storey development would obviate overshadowing.

## Visual impact and overlooking

We enclose locality sections and simple model views to illustrate these impacts – refer in 'Design Assessment Diagrams' – 'Visual Impact: Snapshot Views' and 'Overlooking' pages.

For overlooking, our review shows the impact of 14 storey over 9 is significant, which in turn is significant over a 5 storey development.

For visual impact, it's the same.

## Accessibility

No access bathrooms are provided in any dwelling units. How can there be NCC compliance and project fit?

Without reducing dwelling unit numbers/ level, can the site size enable this – possibly not.

## Cost

There is no cost plan submitted. Our canvassing of a significant city apartment developer-builder's opinion says, for this small, internal corner site, that this proposal can't be built anywhere near any market feasibility.

In short, the mix of height and site characteristics yields very particular (negative) development outcomes:

*30% of enclosed floor area/ level\*\** is devoted to vertical movement – double the usual 15% – but this is not surprising given requirements that have accrued in lifting above the 29m height limit, for, for exceeding the NCC 25m effective floor height control:

- 2x fire stairs required (as included)
- Stretcher lift (increased lift size) required (and with 2x lifts required for frequency, compound cost impact)
- Mechanical air balancing of the fire stairs

\*\*Refer appended Design Assessment diagrams.

Additional cost impacts will be borne by: fire sprinklering standards increased, again an above-25m effective floor height requirement.

Being above 25m, a portable crane is also out of the question + the reach to the back would be excessive > fixed crane a requirement > no width in Hocking Place for that – and that's the only decent rubbish truck/ fire vehicle/ removalist van access to Hocking Court, Evans Place and Faulkner Place dwellings. For a heavy-lifting 14 storey construction, how does the proponent propose that removalists, rubbish and fire trucks will service the dog-legged, skinny-but 2-way Lane World and its dwellings during Hocking Place closure?

Then, on the Square we have a 9m site frontage with no scope for deliveries, storage, amenities, site management facilities, along with a crane. Where will the endless concrete trucks/ pre-cast semis queue, let alone turn out. And if possible what will be the substantial traffic management and roadworks/ Parklands rebuild cost?

All of these things, if overcome, will add significantly to the cost of project preliminaries and therefore cost overall.

The massive material palette will add to footings cost in the site's reactive soils (where's the Geotech report?) – and to framing/ structural walls throughout the project's levels.

Then there's the attempt to get toward some sort of sustainability measures, but these add to cost:

- Automation
- Clever glazing (to offset poor orientation/ lack of sunshading)
- Solar power installation

- Regenerative lifts, scaled to stretcher size for height (above 25m), and 2 thereof, also for height

The landlocked internal corridor will require mechanical servicing.

From our 13 year experience on the Square, security screens and shutters will be required to all ground floor glazing on this site.

A 4 (or 5?) storey build would obviate the (beyond) site management area requirements with lower cost construction methods and logistics.

*How can this project really be 'affordable'?*

Will it be that once an approved height is achieved, the proponent will adjust the layout within the envelope (with a variation to the original approval), alter fitout detail and put the project to the open market? Or it will it simply be on-sold at a healthy profit over the purchase price, which when something only half this height was mooted – but couldn't 'stack up'.



## **APPENDICES**

Locality

Design Assessment diagrams (including for overshadowing and overlooking)

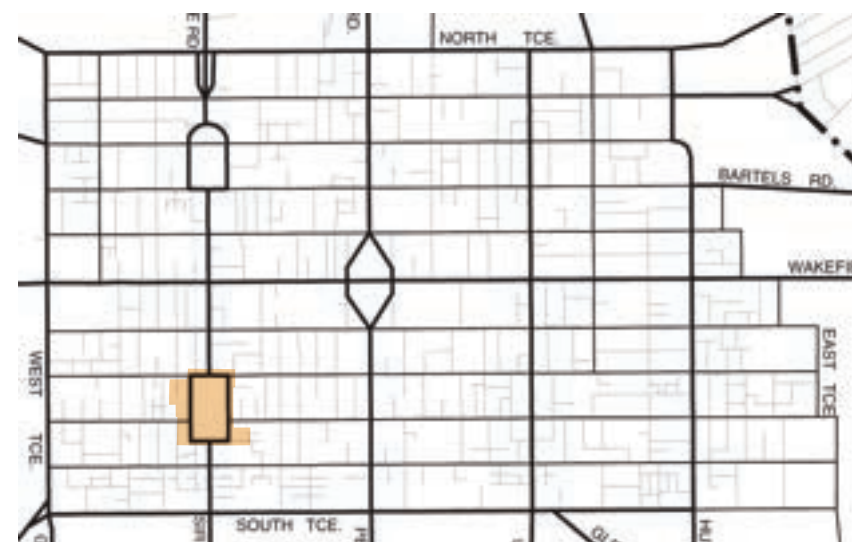
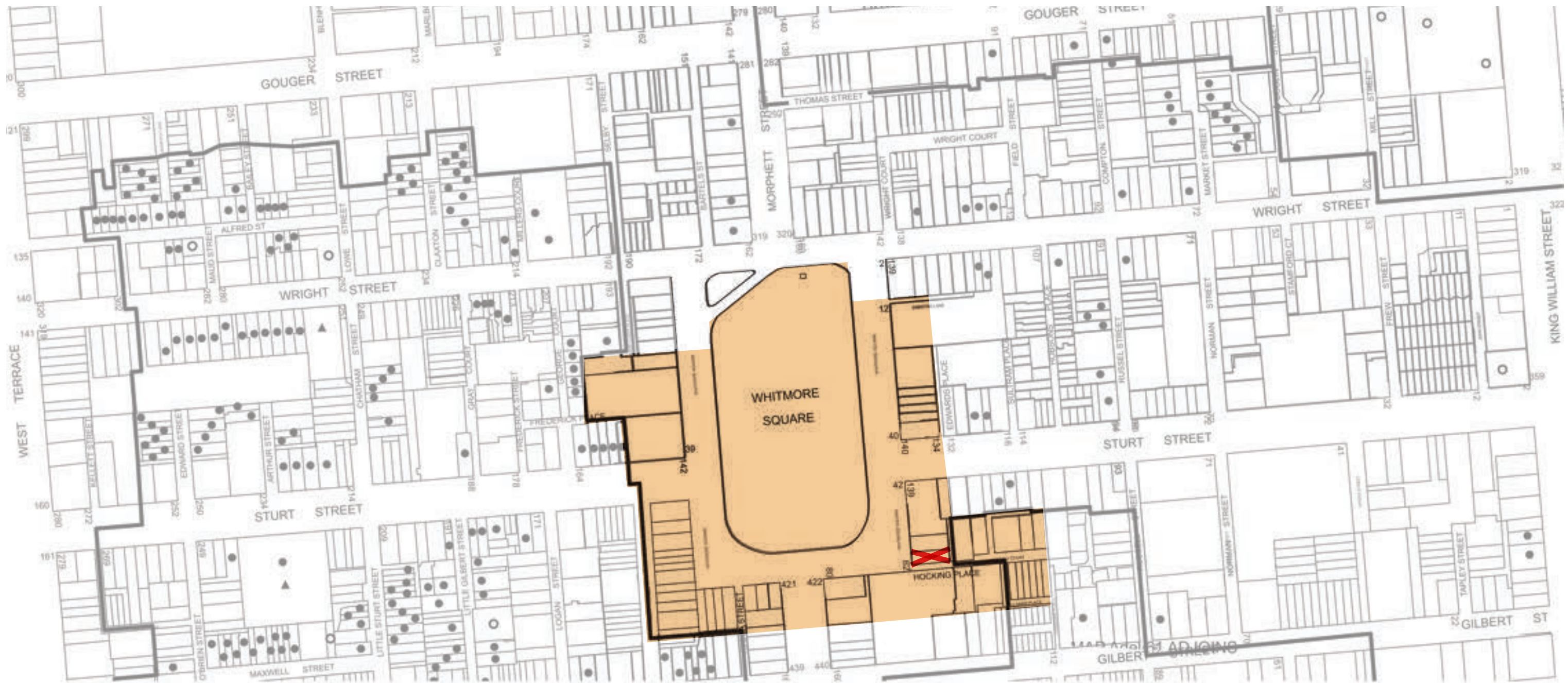
Sustainability reviews

A Review of Sustainability Assessment Frameworks

Douglas Alexander, Heritage Consultant Report

**locality**

troppo



CITY OF ADELAIDE

#### LEGEND

- LOCALITY
- 8 HOCKING PLACE

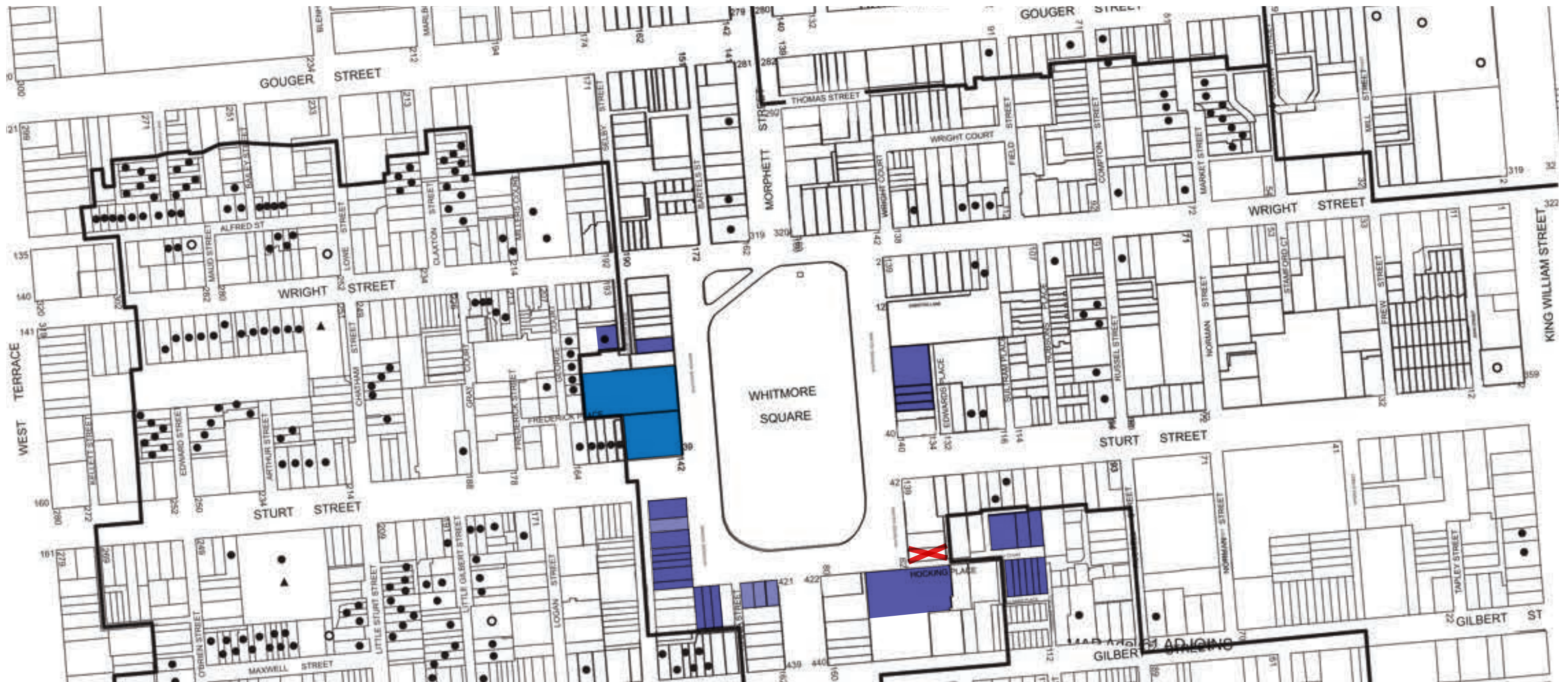




#### LEGEND

- STATE HERITAGE
- LOCAL HERITAGE PLACE
- LOCAL HERITAGE PLACE (Townscape)
- LOCAL HERITAGE PLACE (City Significance)
- UNLISTED (Despite Comparable Historic Fabric to Listed Items)
- UNLISTED (Despite Comparable Modified Fabric to Listed Items)
- 8 HOCKING PLACE





#### LEGEND (YEAR BUILT)

- VISIBLE ON SMITH SURVEY OF 1880
- 1881- 99
- 8 HOCKING PLACE





LEGEND (BUILDINGS 1836-1936)

- NO SETBACK (Hard Edge)
- VERANDAH (No Setback)
- VERANDAH (Setback in Metres by corresponding no.)
- NO VERANDAH (Setback in Metres by corresponding no.)
- 8 HOCKING PLACE





#### LEGEND

(BUILDINGS 1836 - 1936)

- NO SETBACK (Hard Edge))
- VERANDAH (No Setback)
- VERANDAH (Setback in Metres by corresponding no.)
- NO VERANDAH (Setback in Metres by corresponding no.)

(BUILDINGS 1936 - 2012)

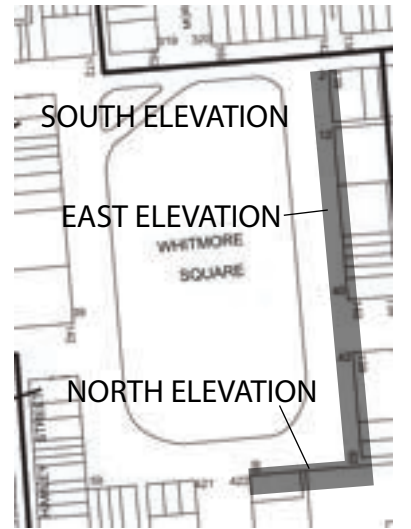
- NO SETBACK (Hard Edge))
- VERANDAH (No Setback)
- VERANDAH (Setback in Metres by corresponding no.)
- NO VERANDAH (Setback in Metres by corresponding no.)

X 8 HOCKING PLACE





WEST ELEVATION



WEST ELEVATION

ADELAIDE AFFORDABLE ECO-HOUSING

NORTH ELEVATION

#### LEGEND

(HERITAGE TYPE)

STATE HERITAGE

LOCAL HERITAGE PLACE

LOCAL HERITAGE PLACE (Townscape)

LOCAL HERITAGE PLACE (City Significance)

UNLISTED  
(Despite Comparable Historic  
Fabric to Listed Items)

UNLISTED  
(Despite Comparable  
Modified Fabric to Listed Items)

### WHITMORE SQUARE (1836-1936) EAST



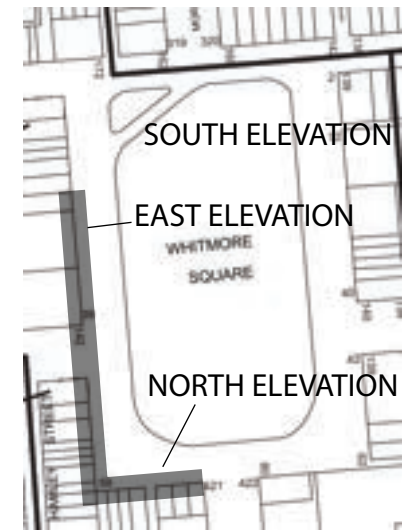


NORTH ELEVATION

EAST ELEVATION



EAST ELEVATION



## WHITMORE SQUARE WEST

### LEGEND

(HERITAGE TYPE)

STATE HERITAGE

LOCAL HERITAGE PLACE

LOCAL HERITAGE PLACE (Townscape)

LOCAL HERITAGE PLACE (City Significance)

UNLISTED  
(Despite Comparable Historic  
Fabric to Listed Items)

UNLISTED  
(Despite Comparable  
Modified Fabric to Listed Items)





HOCKING PLACE NORTH



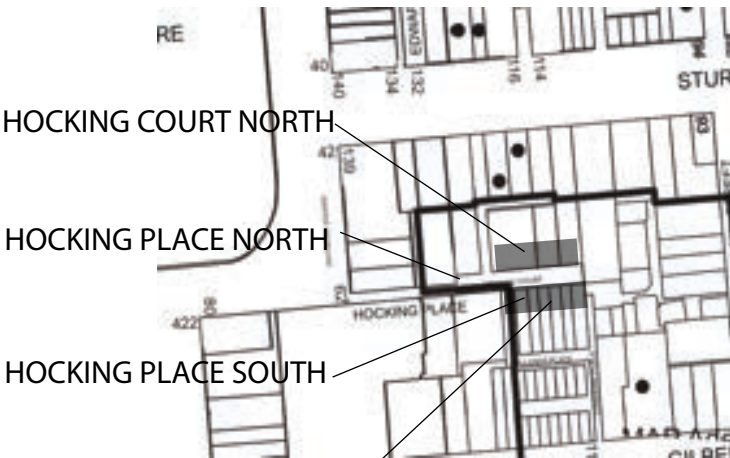
HOCKING COURT NORTH

<1880



HOCKING COURT SOUTH

<1880

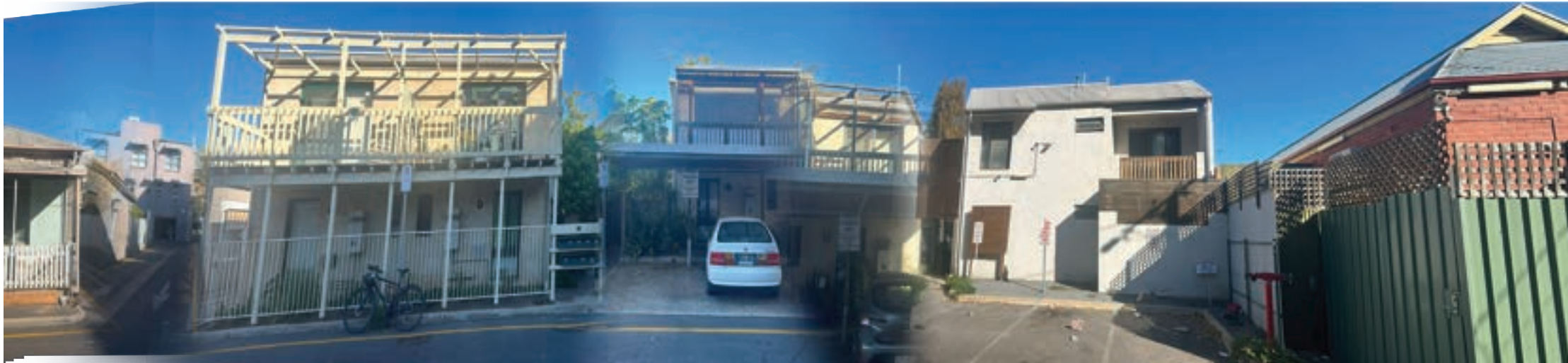


HOCKING COURT NORTH

HOCKING PLACE NORTH

HOCKING PLACE SOUTH

HOCKING COURT NORTH



HOCKING PLACE SOUTH

LEGEND  
(HERITAGE TYPE)

STATE HERITAGE

LOCAL HERITAGE PLACE

LOCAL HERITAGE PLACE (Townscape)

LOCAL HERITAGE PLACE (City Significance)

UNLISTED  
(Despite Comparable Historic  
Fabric to Listed Items)

UNLISTED  
(Despite Comparable  
Modified Fabric to Listed Items)

### HOCKING PLACE & COURT

**design assessment diagrams**

troppo



# Design Response

Typical Floor Plan  
Level 04

Area	Living	Balc.
Apartment 01	52m <sup>2</sup>	12m <sup>2</sup>
Apartment 02	54m <sup>2</sup>	8m <sup>2</sup>
Apartment 03	54m <sup>2</sup>	8m <sup>2</sup>
Core		



# Design Response

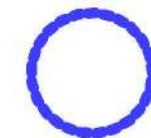
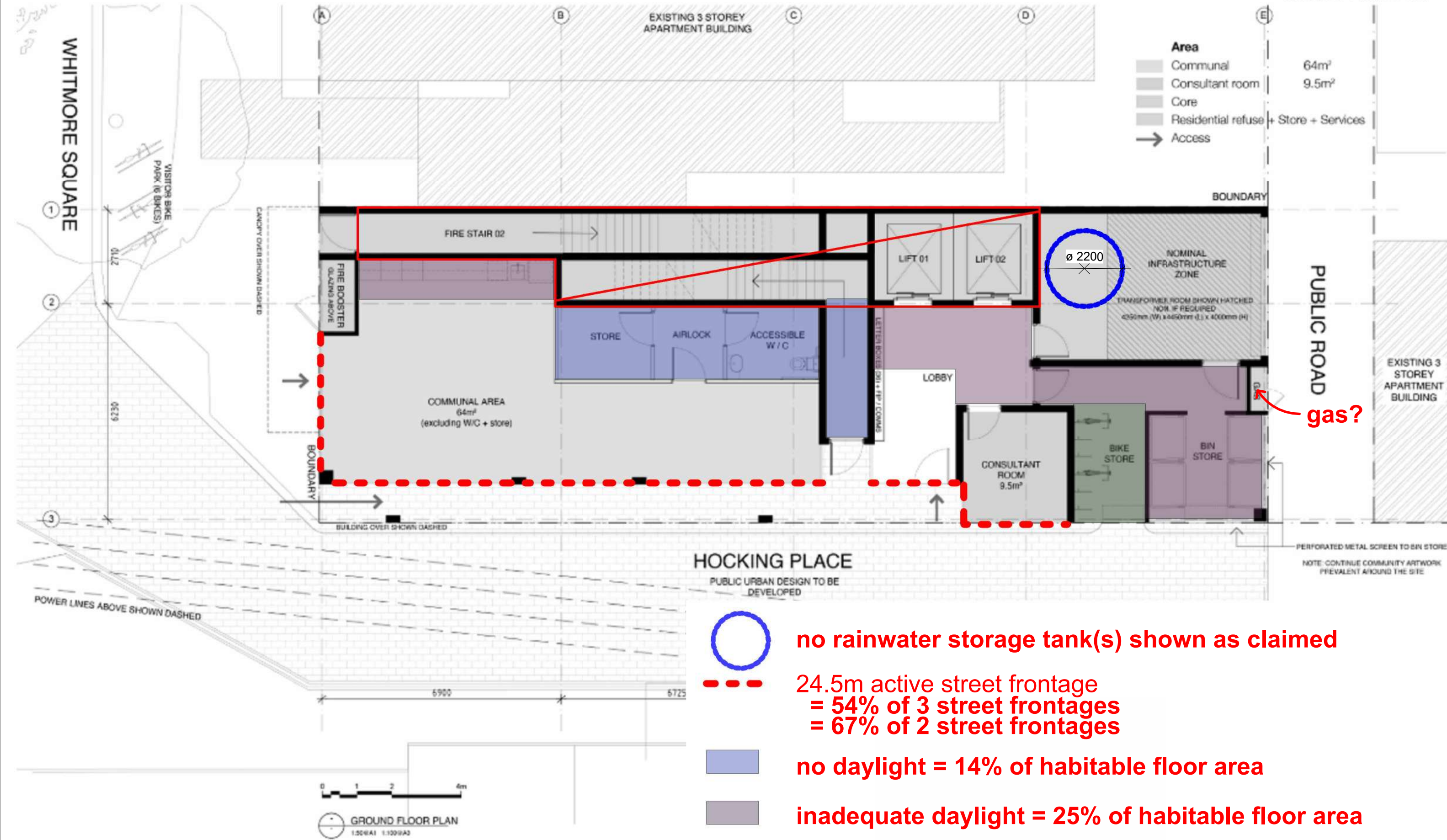
Typical Floor Plan  
Level 11 - 13





# Design Response

Ground Floor Plan



no rainwater storage tank(s) shown as claimed



24.5m active street frontage  
= 54% of 3 street frontages  
= 67% of 2 street frontages



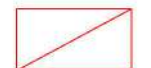
no daylight = 14% of habitable floor area



inadequate daylight = 25% of habitable floor area



6 bike parks for 36 units/ 42 beds/ 84 people

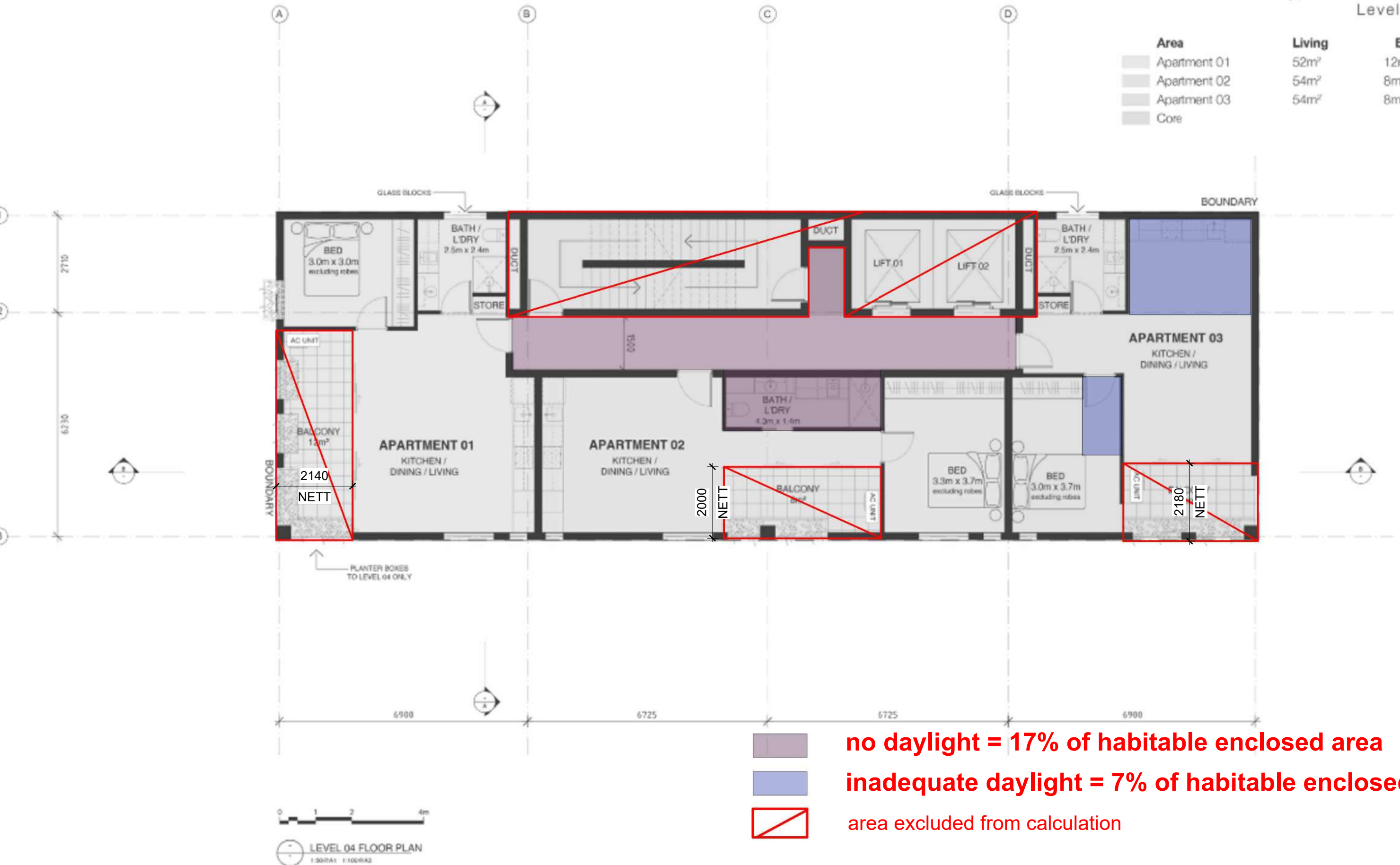


area excluded from calculation

# Design Response

Typical Floor Plan  
Level 04

Area	Living	Balc.
Apartment 01	52m <sup>2</sup>	12m <sup>2</sup>
Apartment 02	54m <sup>2</sup>	8m <sup>2</sup>
Apartment 03	54m <sup>2</sup>	8m <sup>2</sup>
Core		





# Design Response

Typical Floor Plan  
Level 11 - 13

Area	Living	Balc.
Apartment 01	82m <sup>2</sup>	11m <sup>2</sup>
Apartment 02	82m <sup>2</sup>	11m <sup>2</sup>
Core		



0 1 2 4m  
LEVEL 11 - 13 FLOOR PLAN  
1:500(A1) 1:100(A3)



no daylight = 14% of habitable enclosed area  
inadequate daylight = 1.5% of habitable enclosed area  
area excluded from calculation

# Design Response

Ground floor  
Activation





Design Response

Elevations

Materials

- 01 Blue glazed bricks
- 02 White precast concrete
- 03 Grey glazing

zero western sun shading

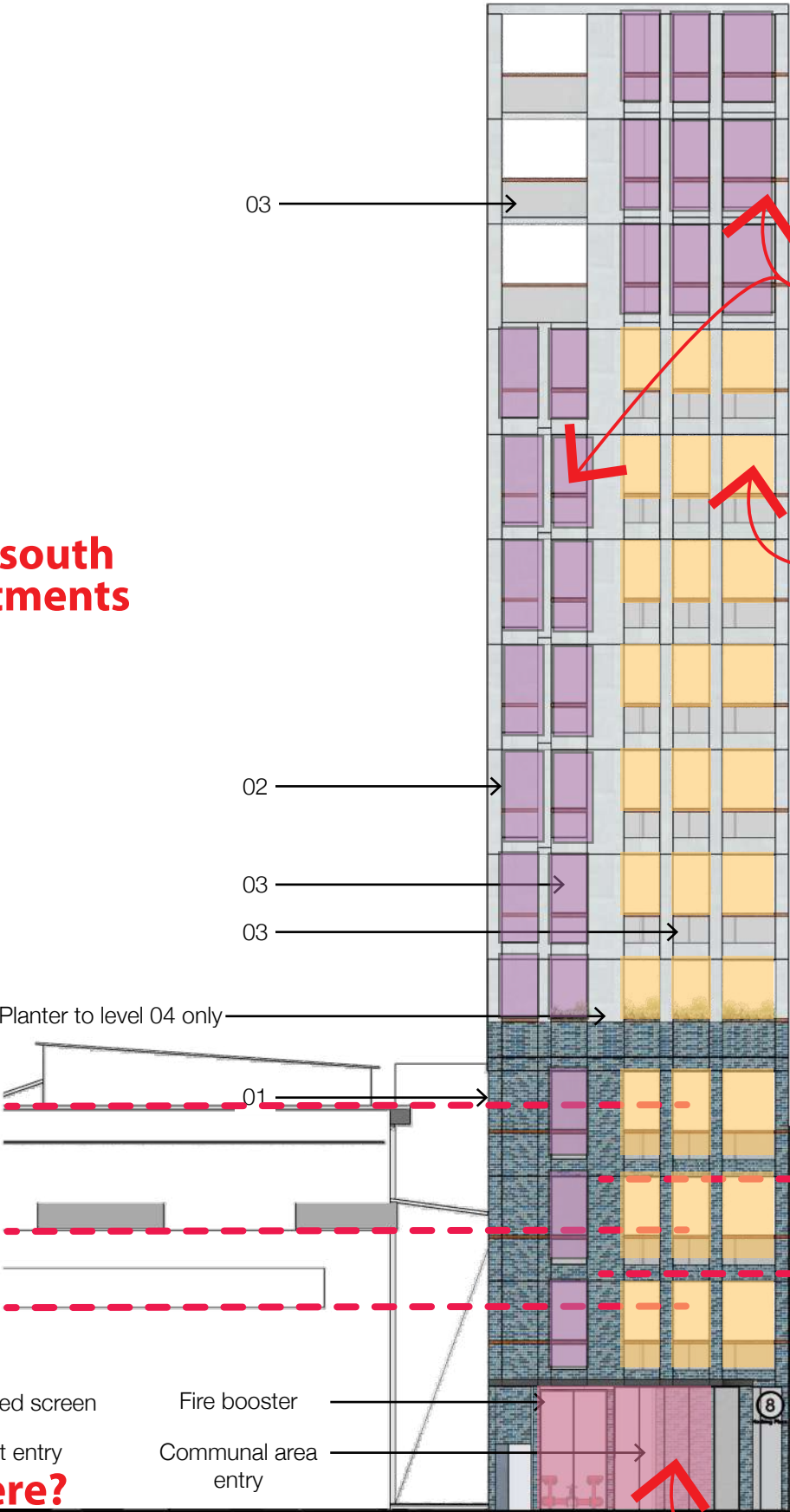
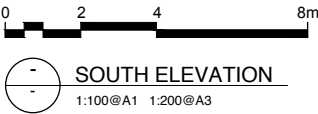
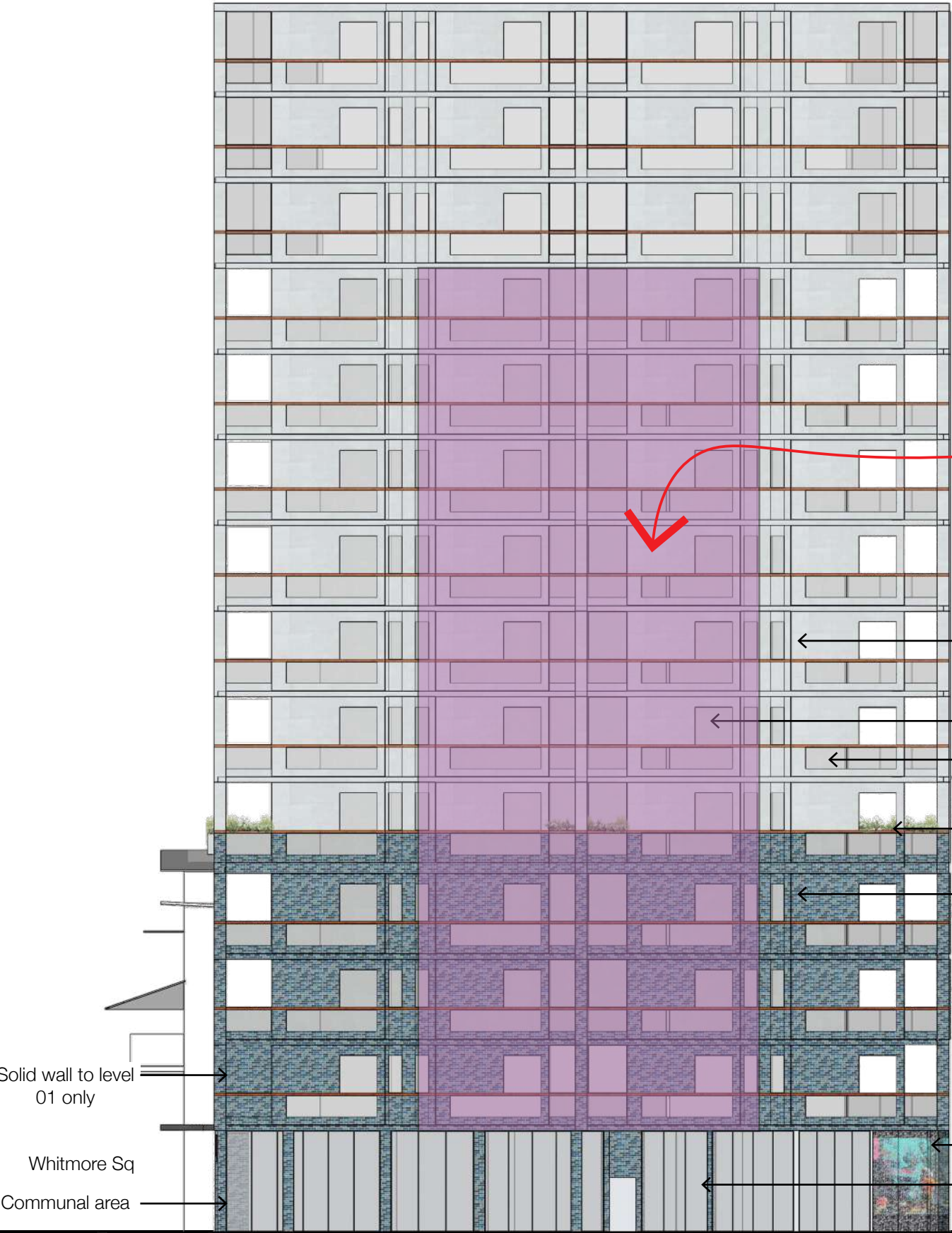
minimal western sun shading

ignored contextual height lines

no framing/  
detailing to entry

totally only south facing apartments

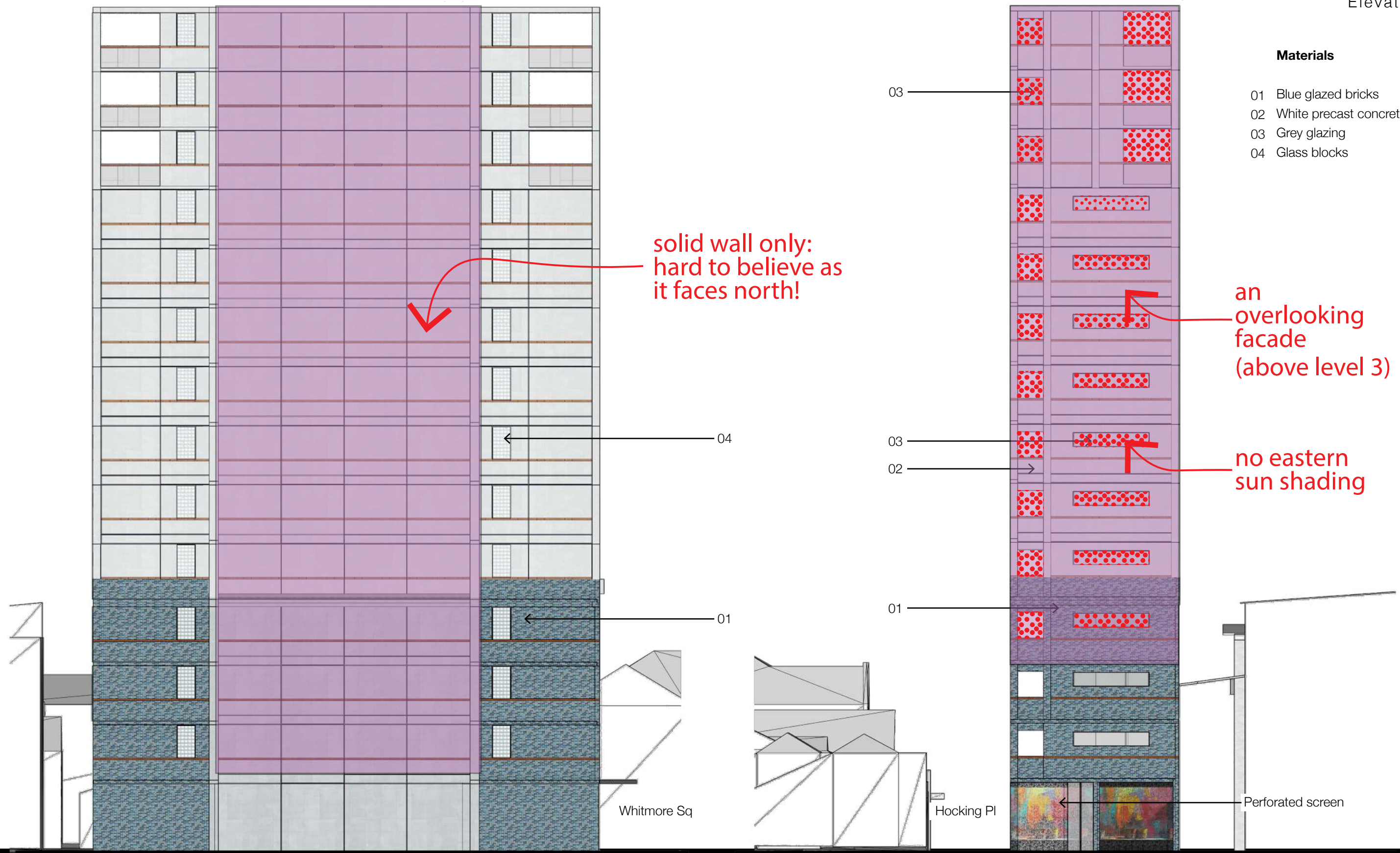
where?  
no signalling/  
detailing





# Design Response

Elevations

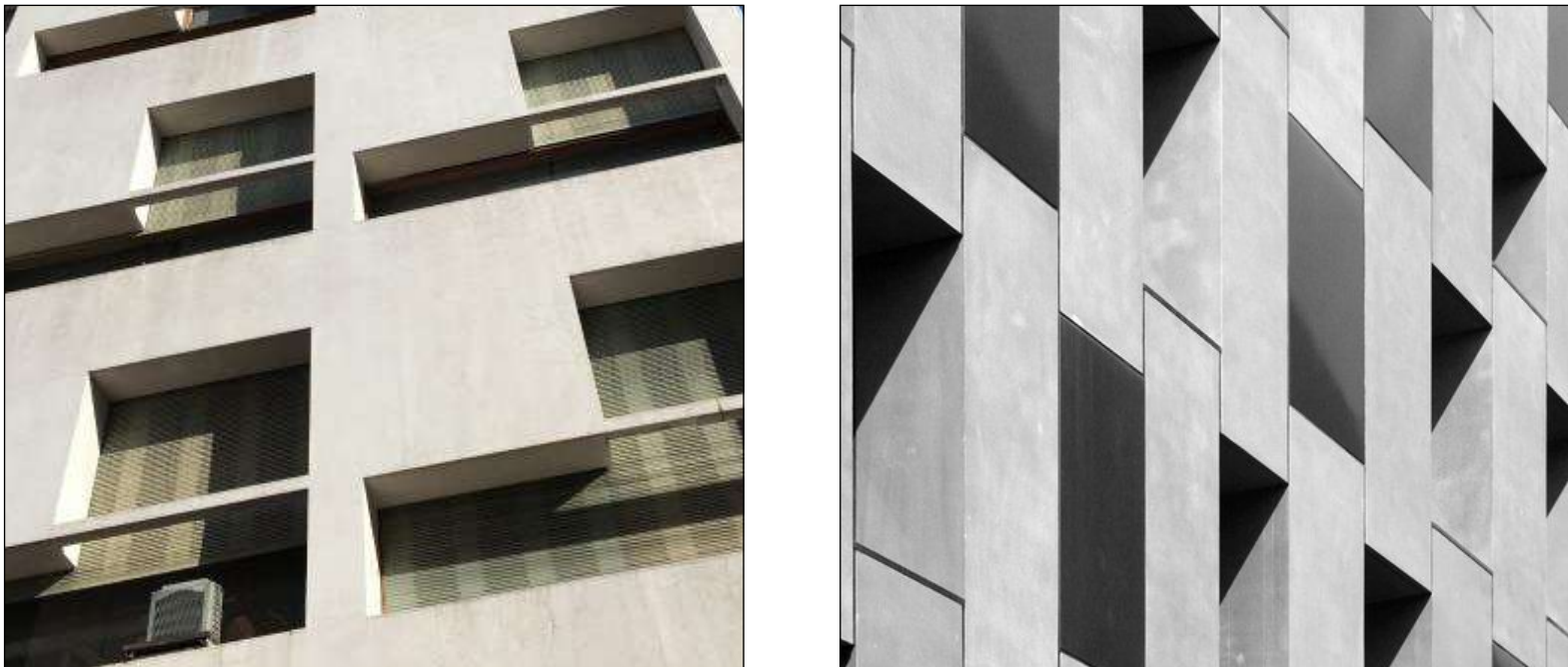




# Design Response

Material Character  
Architectural form + style

Details of exterior and material precedents,  
indicating architectural form and style to be  
used on proposed apartments;



the locality:



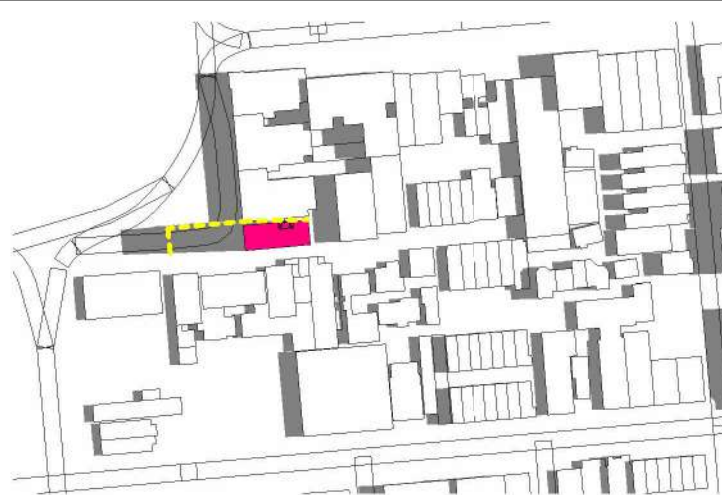
at least that insertion  
aligns to  
neighbouring  
heights and lines

the locality:





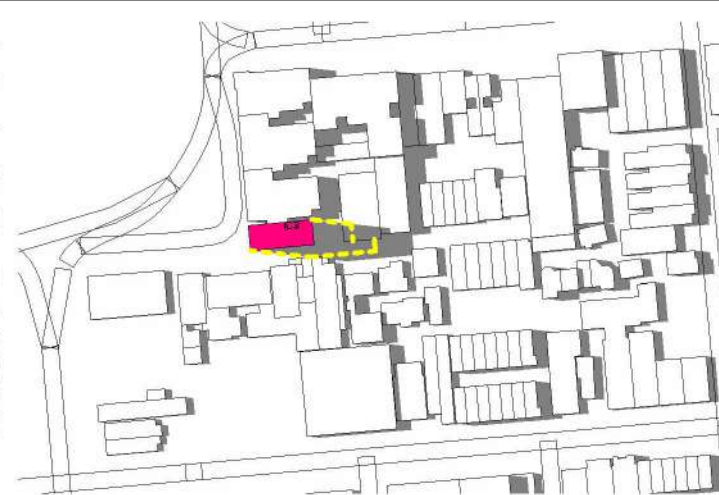
FOR 47.5m BUILDING + 29m BUILDING



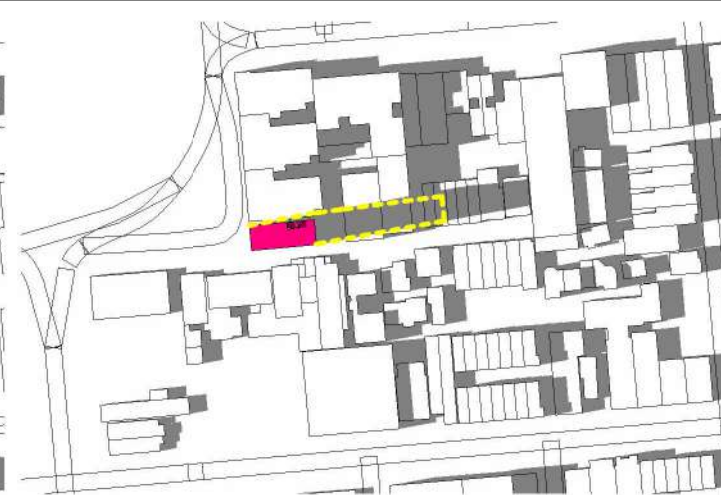
**summer solstice 9am**  
1 : 2750 / DECEMBER 21



**summer solstice 12pm**  
1 : 2750 / DECEMBER 21



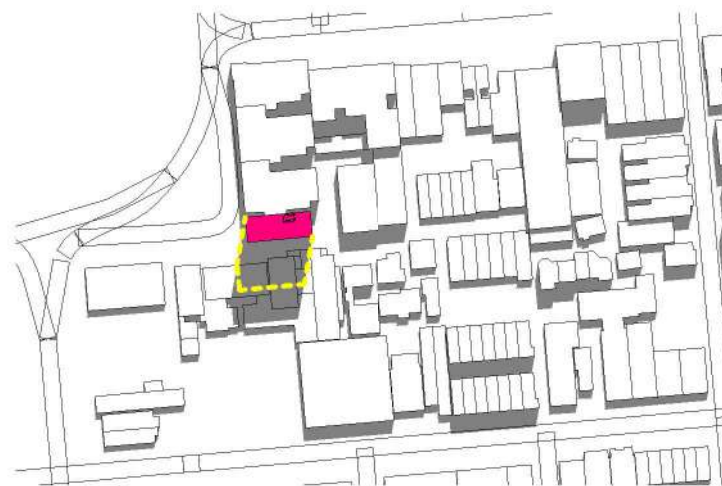
**summer solstice 3pm**  
1 : 2750 / DECEMBER 21



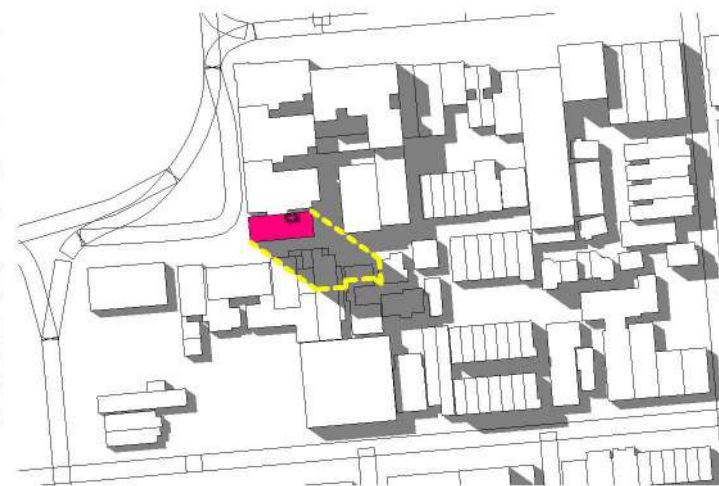
**summer solstice 5pm**  
1 : 2750 / DECEMBER 21



**autumn equinox 9am**  
1 : 2750 / MARCH 21



**autumn equinox 12pm**  
1 : 2750 / MARCH 21



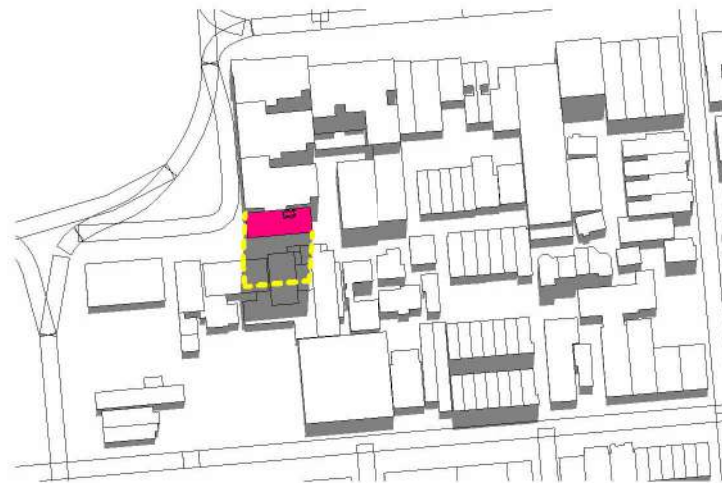
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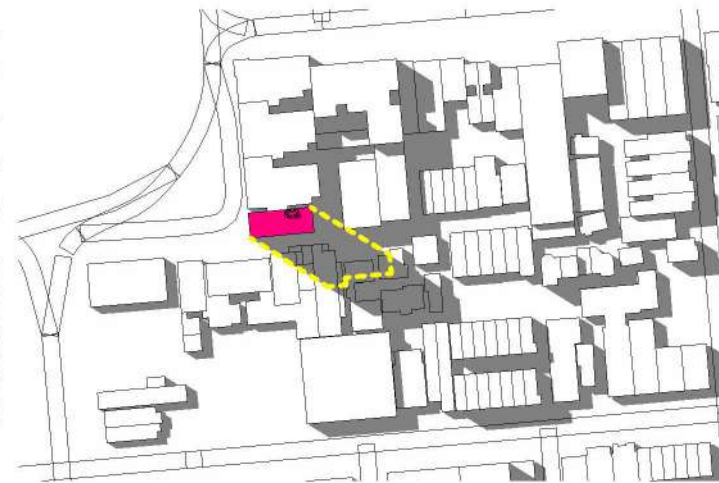
**autumn equinox 5pm**  
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**spring equinox 9am**  
1 : 2750 / SEPTEMBER 21



**spring equinox 12pm**  
1 : 2750 / SEPTEMBER 21



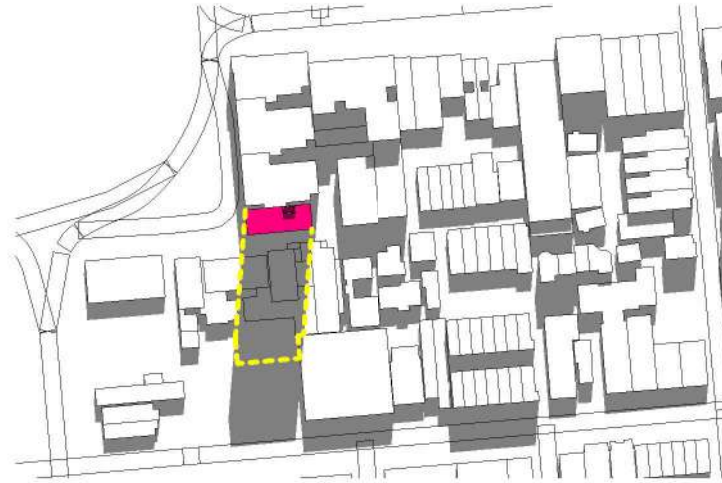
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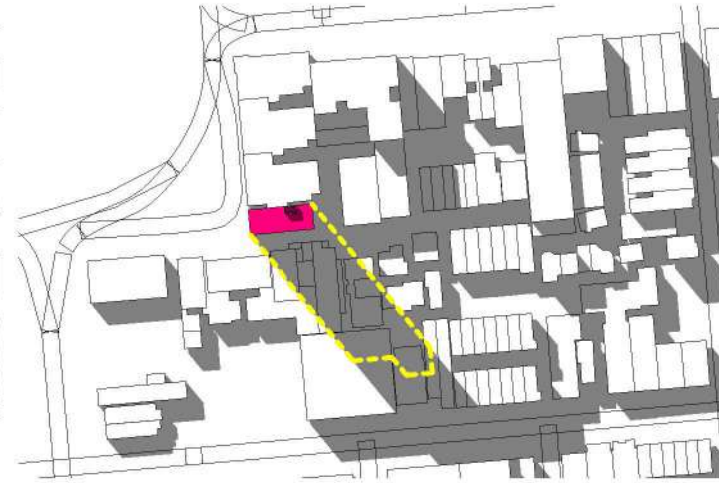
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**winter solstice 9am**  
1 : 2750 / JUNE 21



**winter solstice 12pm**  
1 : 2750 / JUNE 21



**winter solstice 3pm**  
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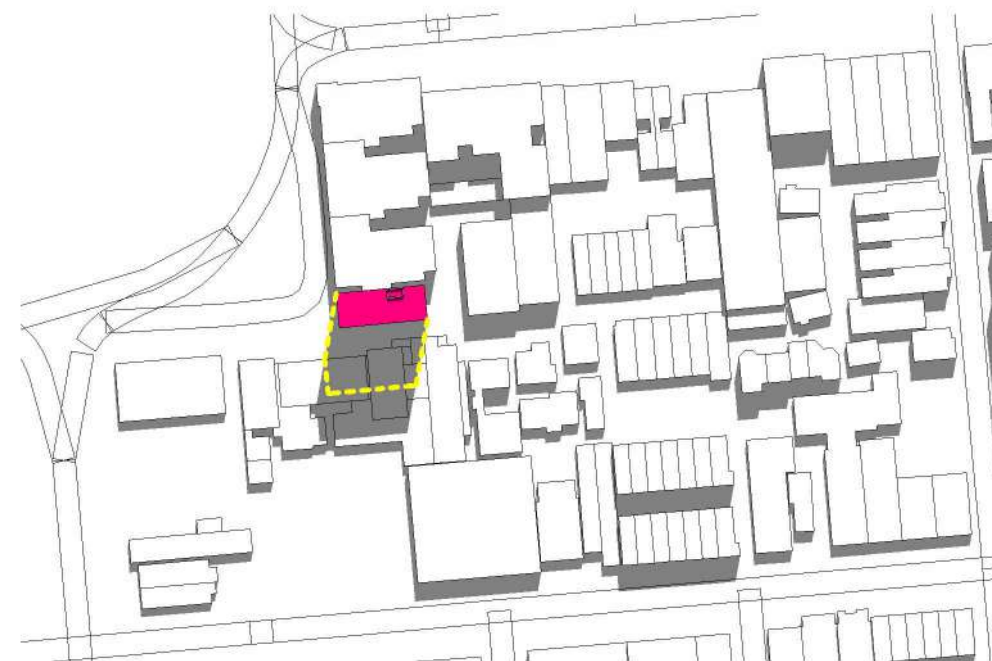
8 HOCKING PLACE  
VISUAL IMPACT  
**OVERSHADOWING**  
17.04.2025



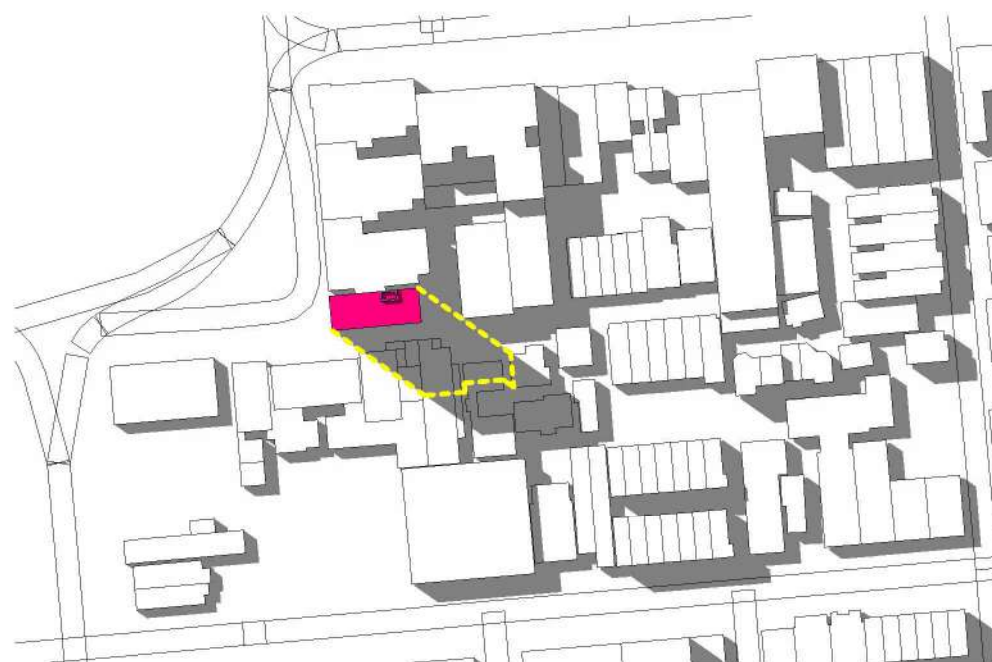




autumn equinox 9am  
1 : 2000



autumn equinox 12PM  
1 : 2000



autumn equinox 3pm  
1 : 2000



autumn equinox 5pm  
1 : 2000

**FOR 47.5m BUILDING ■ + 29m BUILDING ■**

**AUTUMN EQUINOX: ENLARGEMENT**

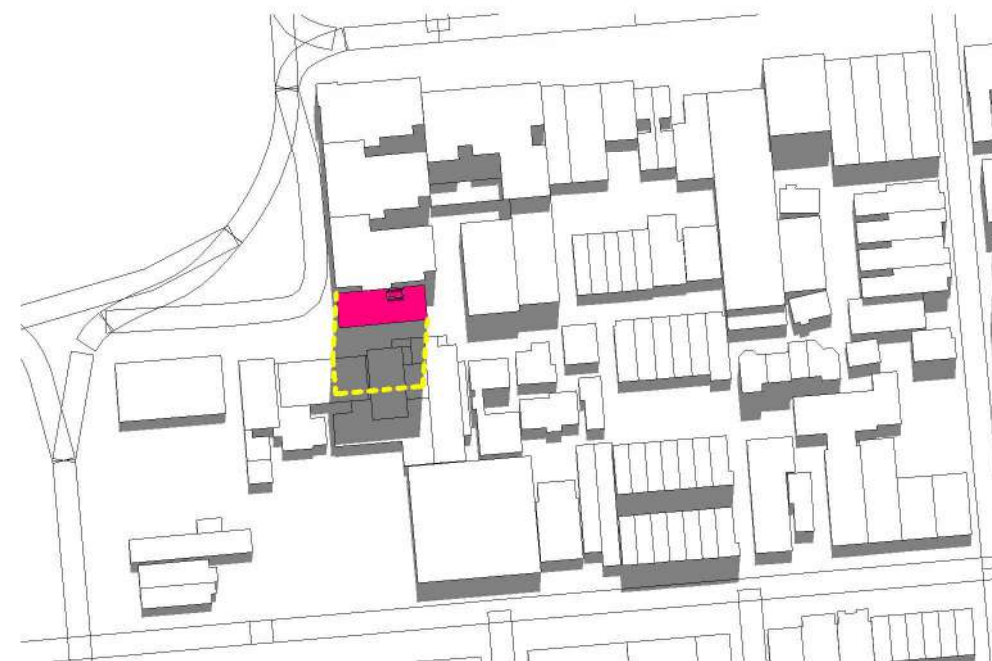
MARCH 21

8 HOCKING PLACE  
VISUAL IMPACT  
**OVERSHADOWING**  
17.04.2025

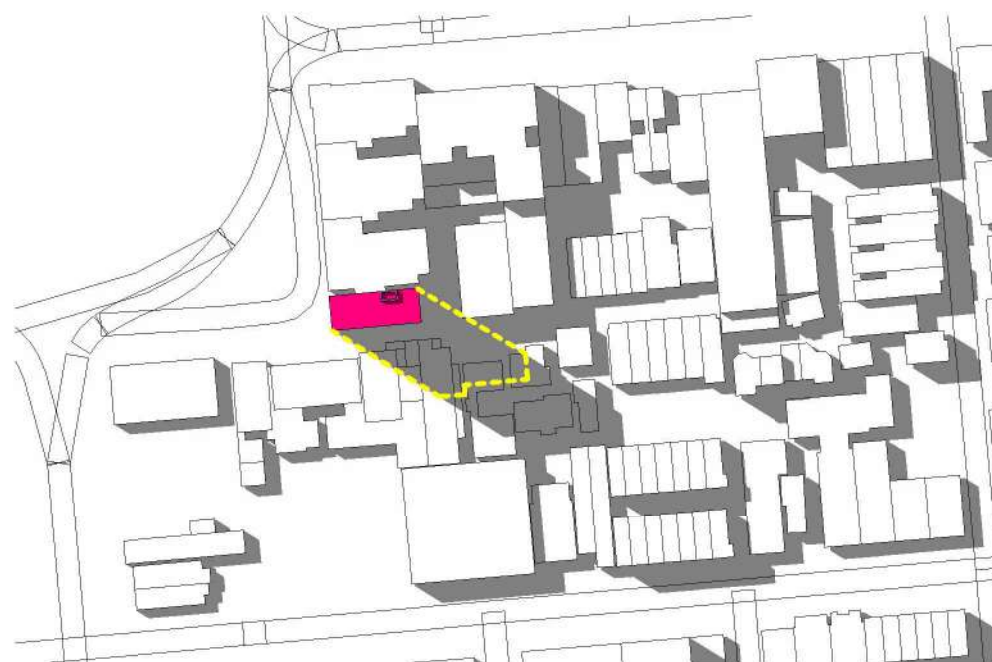




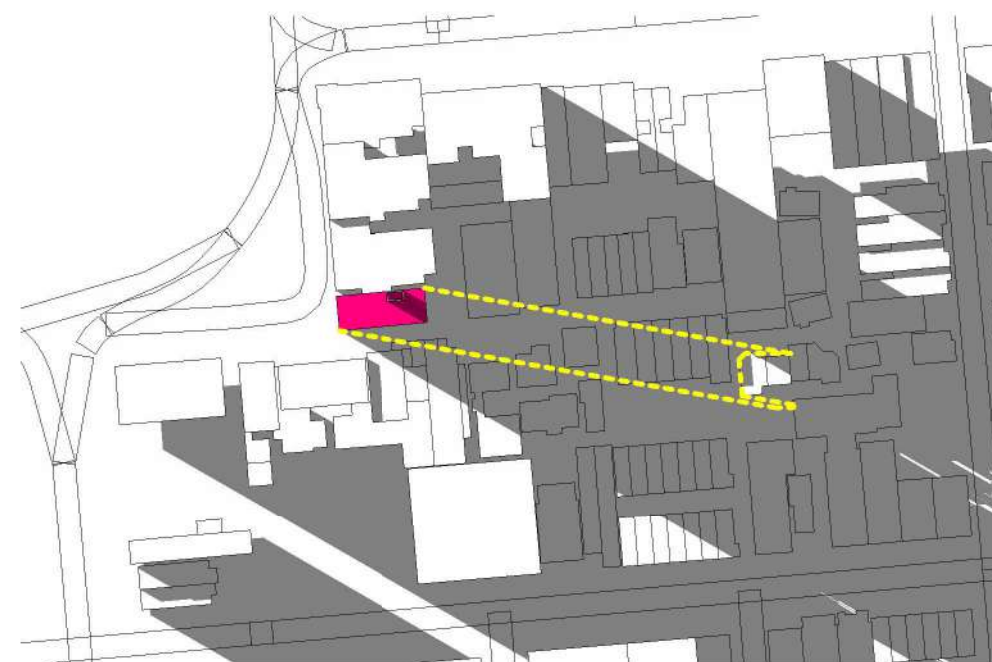
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1:2000



spring equinox 12pm  
1:2000



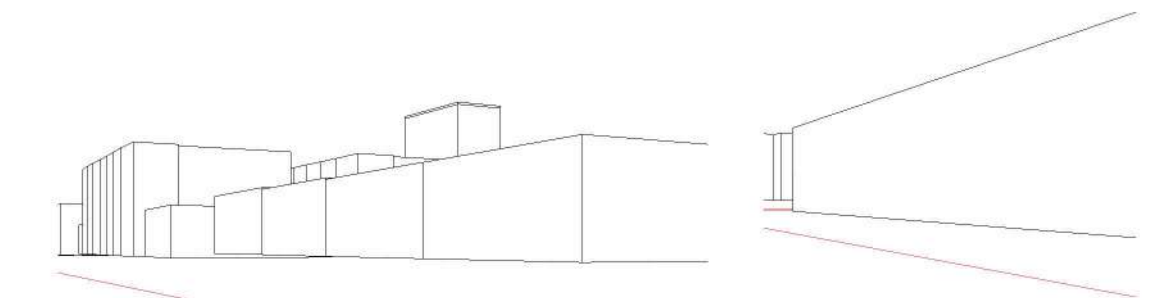
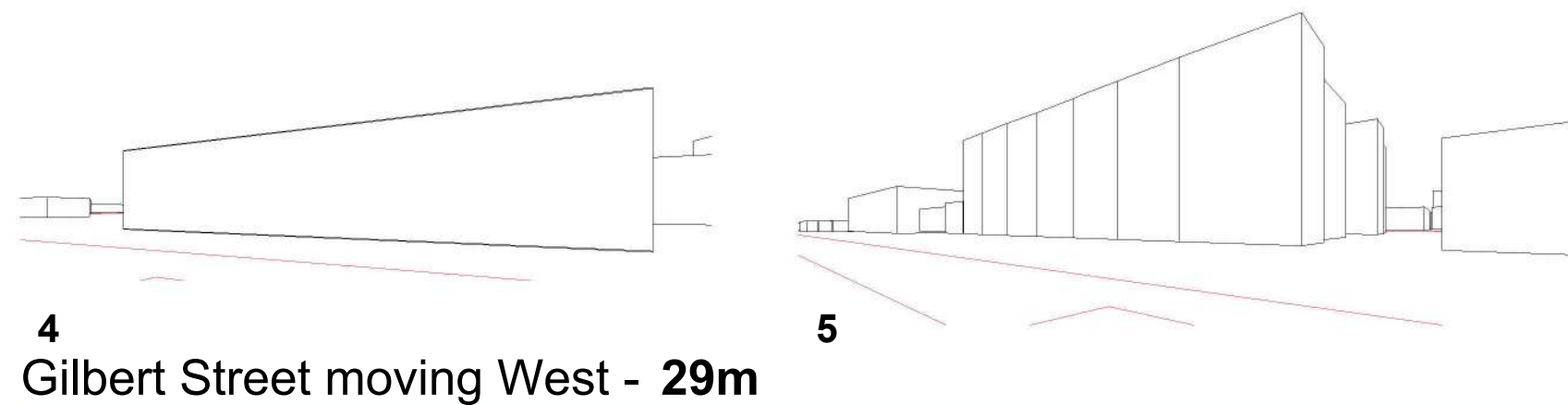
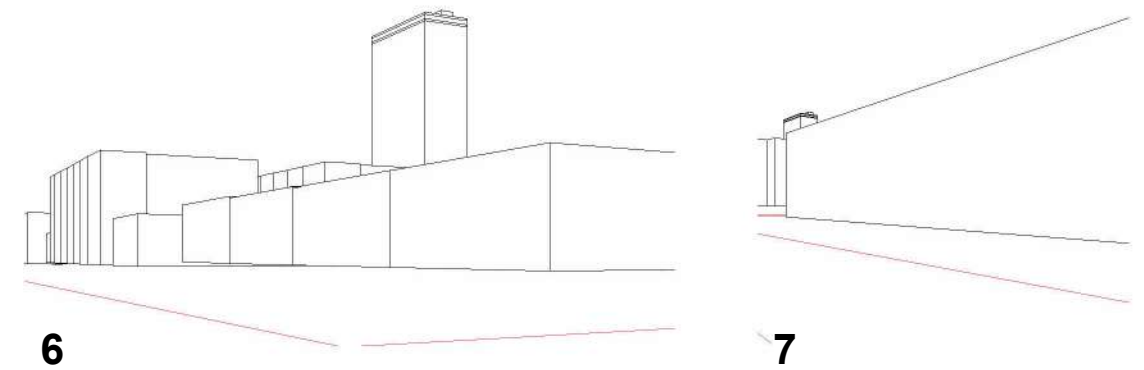
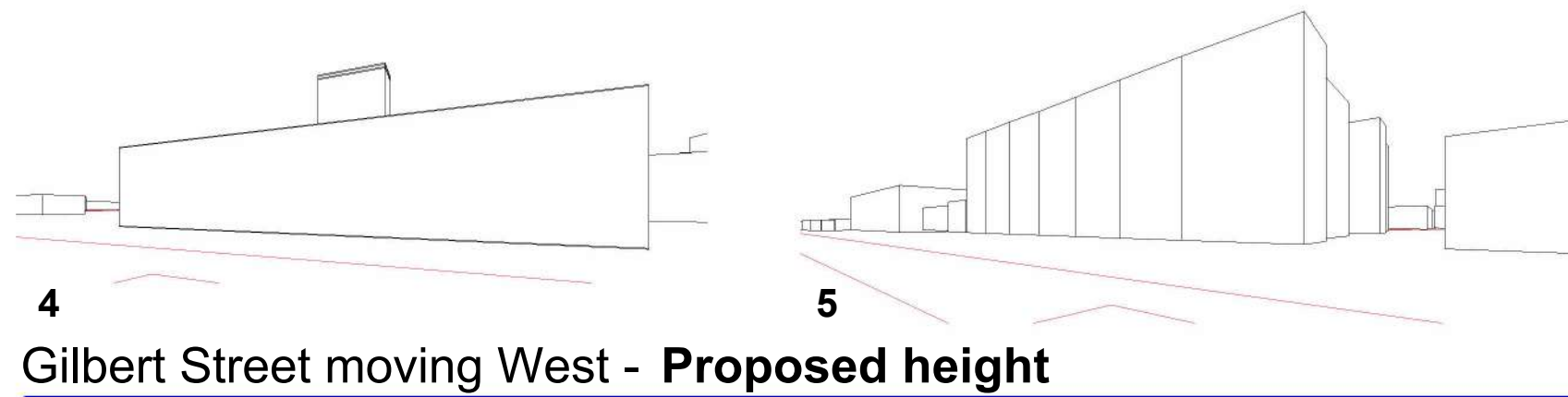
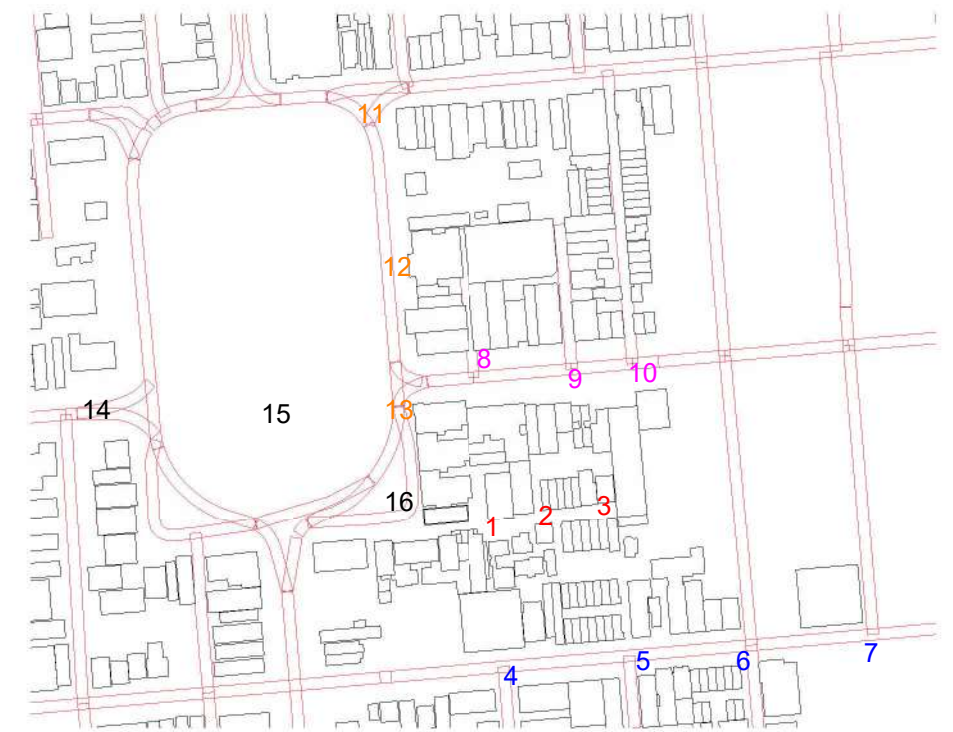
spring equinox 3pm  
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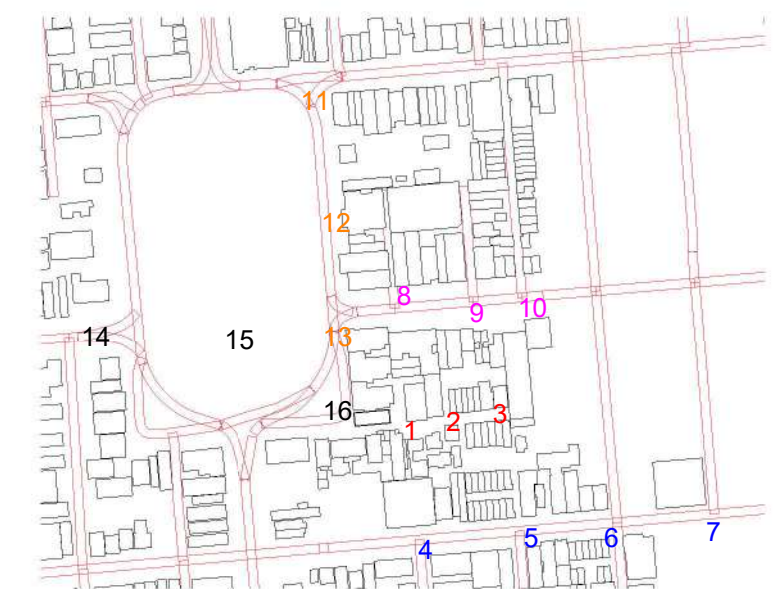
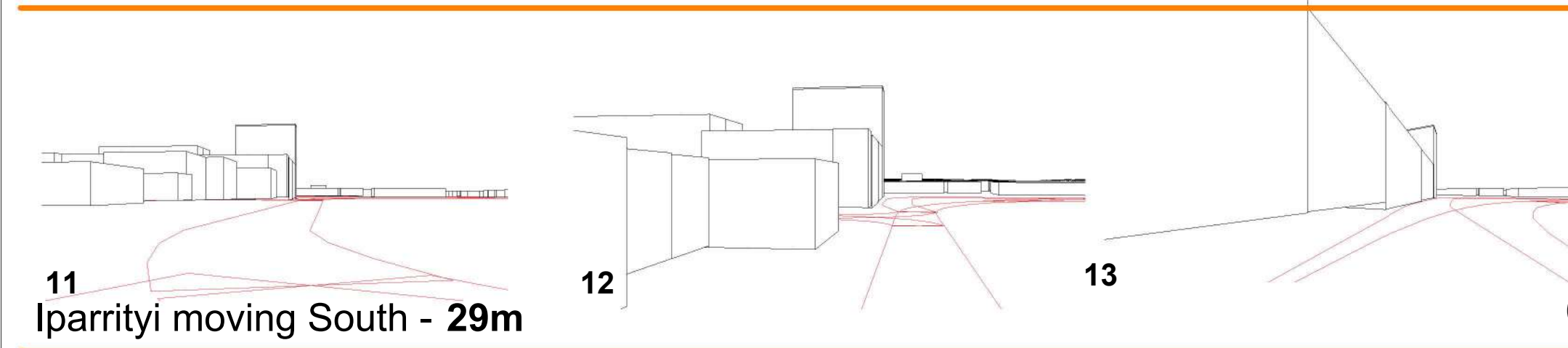
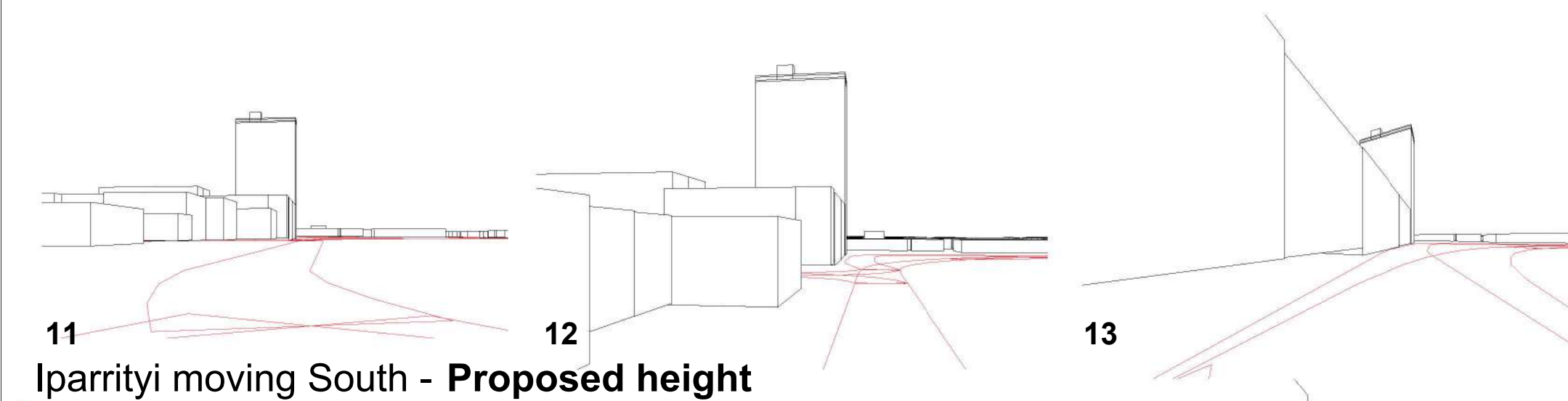
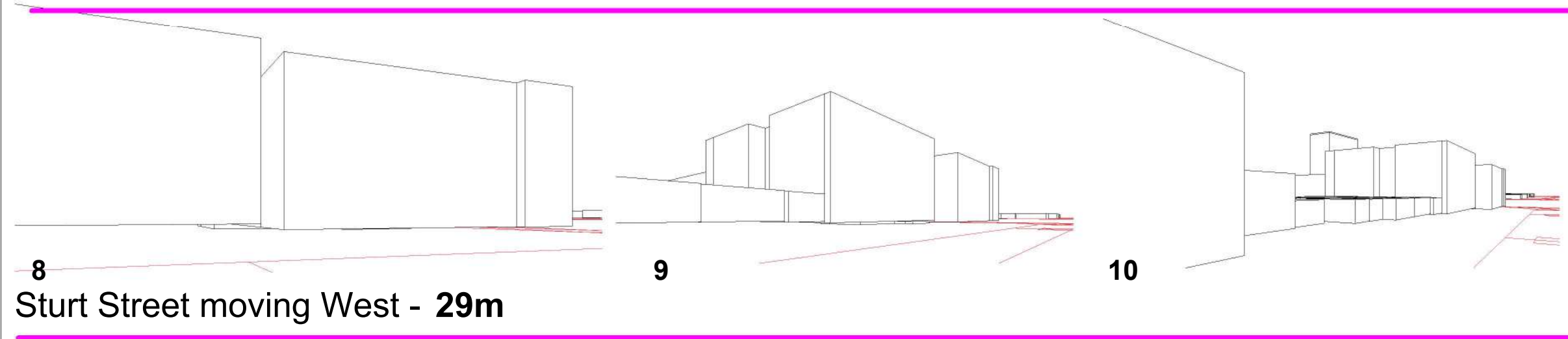
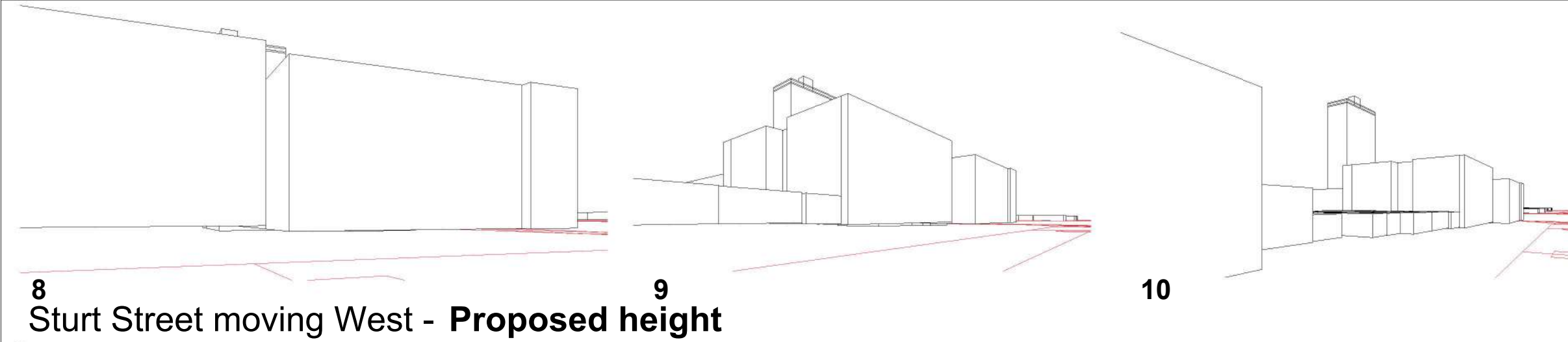


spring equinox 5pm  
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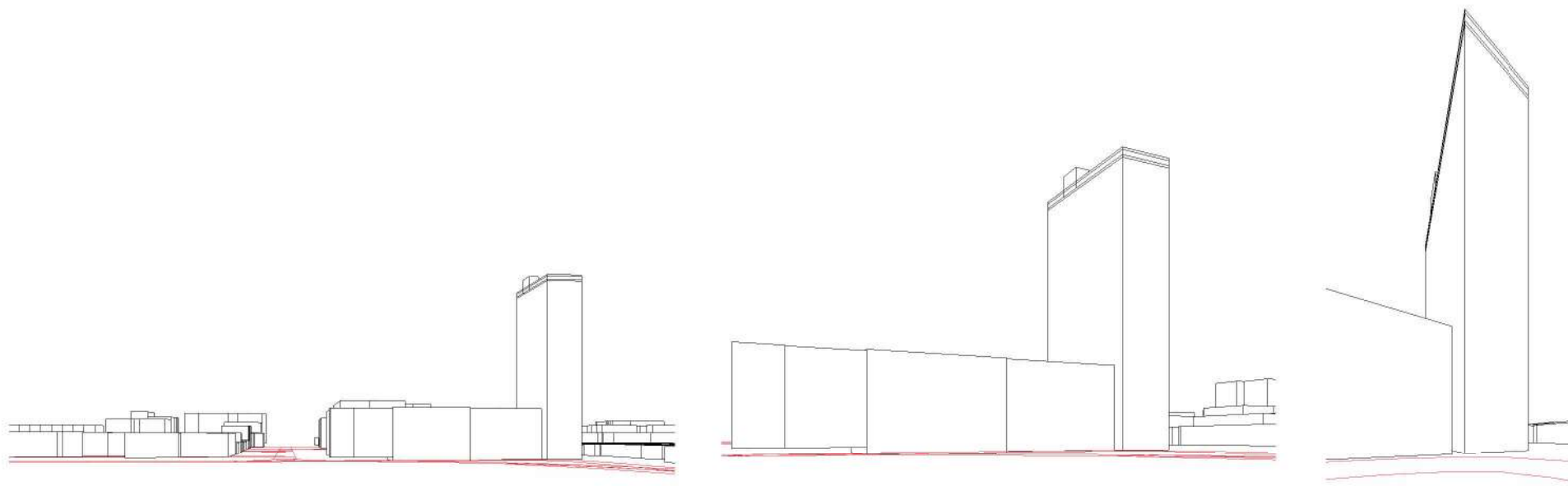
**FOR 47.5m BUILDING ■ + 29m BUILDING ■**  
**SPRING EQUINOX: ENLARGEMENT**  
 SEPTEMBER 21

8 HOCKING PLACE  
 VISUAL IMPACT  
**OVERSHADOWING**  
 17.04.2025



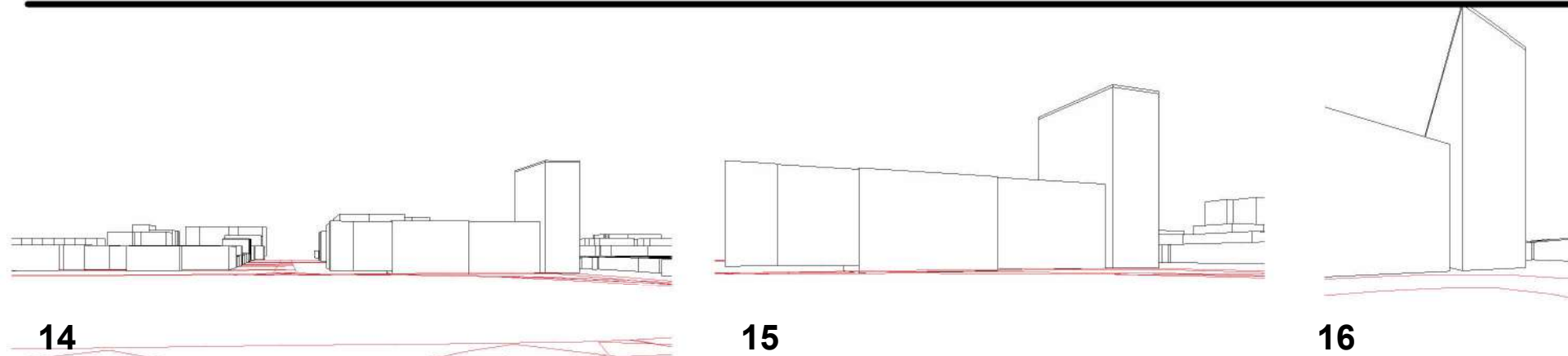






14 Sturt Street/ Iparrityi moving East - **Proposed height**

16



14 Sturt Street/ Iparrityi moving East - **29m**

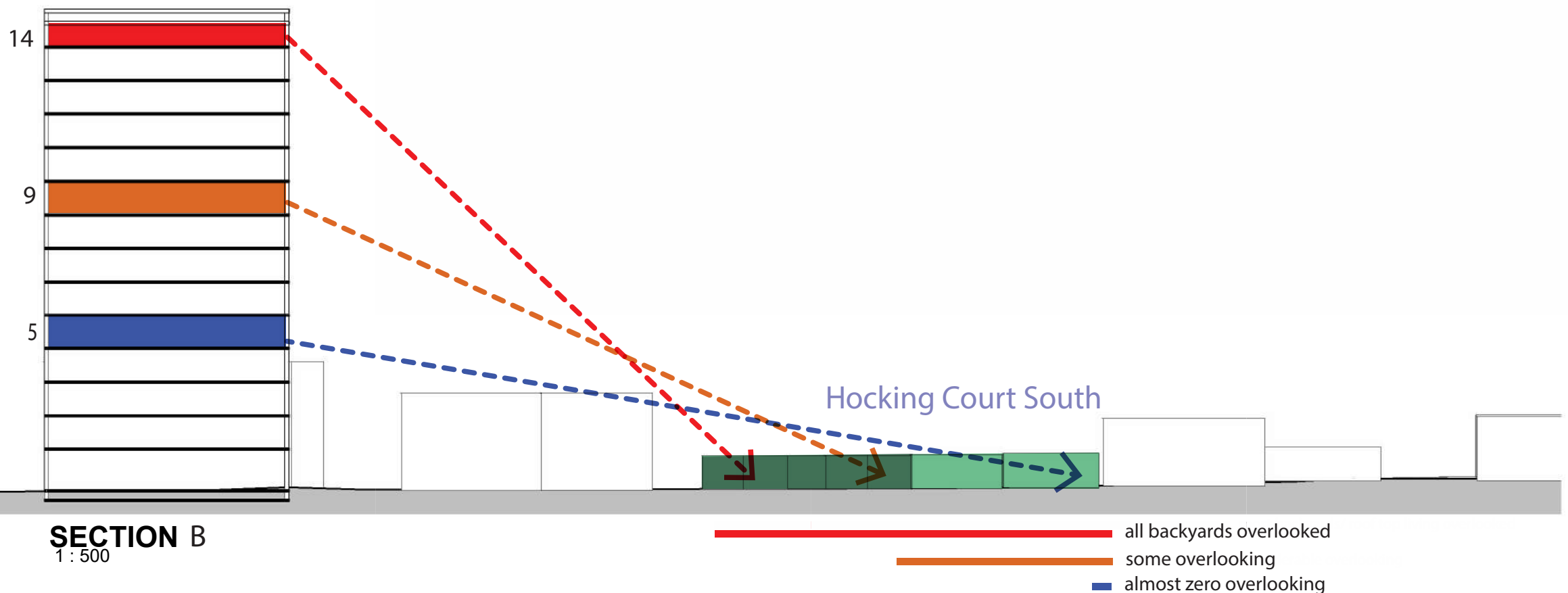
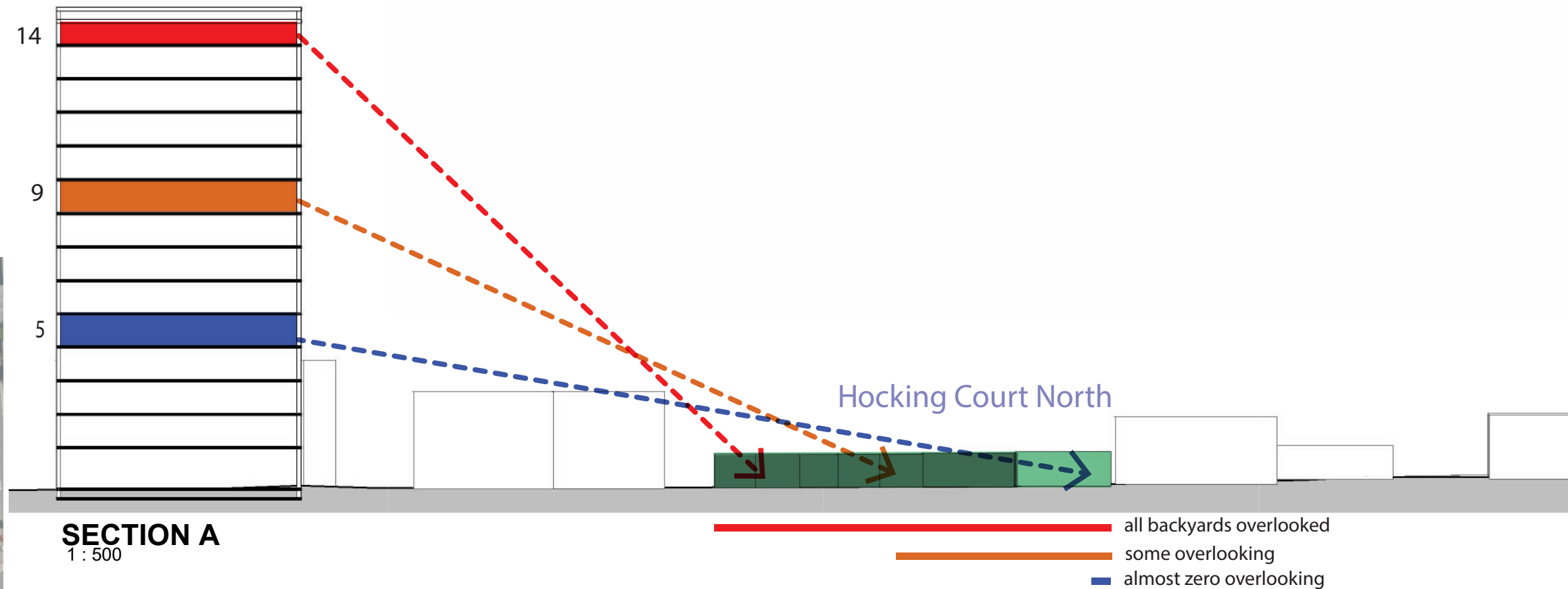
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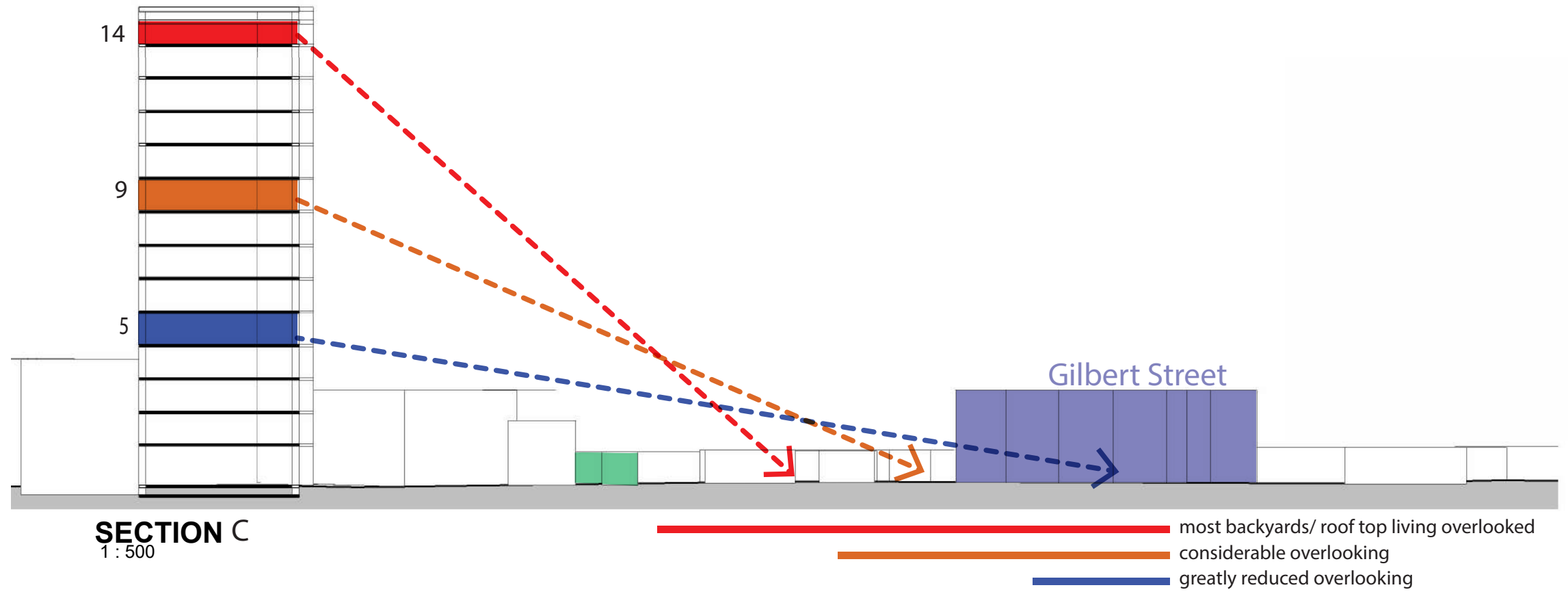




# LEGEND

-  FOCUS AREA
-  BACKYARDS
-  ROOF TOP LIVING
-  8 HOCKING PLACE





LEGEND

- FOCUS AREA
- BACKYARDS
- ROOF TOP LIVING
- 8 HOCKING PLACE



Design for Climate/ Energy Efficiency 1.01: Orient/ plan for northern solar access:  
**SOLAR ACCESS FAIL**  
28% of units have southern orientation only  
28% have morning solar access only\*\*  
28% have afternoon solar access only  
Only 16% (top 3 levels) have decent solar access  
\*\*and limited by overlooking constraints

# Design Response

Sustainability

\*\*For a more comprehensive ESD Intent see Stantec report

## Ecologically Sustainable Development

- Increased 7.5 star target average
  - Individual apartments to achieve a minimum of 6 stars
  - Fully electrified building inc. heating, cooling, hot water and apartment cooking
  - Embedded network allowing greater operational savings for residents + maximising the self-utilisation of behind the meter generated renewable energy
  - 3 streams of waste collection for reduced landfill in operation + additional waste stream for e-waste (batteries)
  - Energy efficient LED lighting
  - Energy efficient appliances to all apartments
  - Vertical transport with 'standby' power modes and regenerative drives
  - Photovoltaic panels on roof
  - WELS rated tap ware and sanitaryware
  - Automatic and manually controlled air conditioning systems
- star ratings only respond to NCC lowest common denominator parameters
- standard
- what could possibly go wrong here!
- standard
- standard
- standard
- to 1/8th demand only
- standard
- standard



Photovoltaic panels



LED down lights



Waste

## Building Fabric

- High performance facades
  - Glazing to standard apartment levels is a double glazed, high performing, low-e coating to control solar gain and achieve the required thermal performance outcomes without reliance on external shading
  - Glazing minimum VLT of 40% for improved daylight
  - Operable windows designed to maximise cross flow ventilation and reduce mechanical cooling
  - External finishes to reflect heat and reduce solar gain
  - Improved air tightness to increase energy efficiency and health benefits
  - Reduced embodied carbon impact by nominating concrete with 30% reduction in Portland cement
  - High performance insulation
  - Low environmental impact materials and finishes
  - Use of long life materials and finishes
  - Best practice acoustic performance
- inadequate daylight overall
- no cross ventilation with land-locked corridor
- no they're not - they're thermally massive
- what health benefits from no fresh air?
- concrete is huge in embodied energy - should be used sparingly, not as all floors, framing and cladding
- cement / concrete has high environmental impact - it's extractive and polluting
- sheer surfaces will not age gracefully
- how?

## Health and Wellbeing

- Extensive access to outside views
  - Opportunities for shared activities in communal spaces
  - Access to open air balconies
  - Connectivity to local shops and parklands
  - Bicycle storage facilities are provided to deter the use of cars and encourage green transport
  - High quality daylight to all levels and communal spaces
  - Natural ventilation to all apartments and communal spaces
- 14 storeys up - of course!
- on full display behind glazing - really?
- too narrow
- no commercial here though
- 6 for 84 people + visitors!
- falsehood
- minimal + no door systems illustrated to communal space



Bicycle storage



Open air balconies

*Our **first statement** of advice from a pre-eminent Adelaide-based national ESD expert, also qualified in a more holistic approach to Sustainability:*

[The Sustainability] Report alludes to the following to provide 'worthwhile and real-world impact', but could be a bit far reaching, so following up with comments.

- High performance double glazing - now with full adoption of the 2022 Section J requirements in SA, it would be pretty difficult to get through BCA compliance without double glazing for any resi project, so whilst they might claim this is additional sustainability attributes, I don't really think that can be claimed to be 'above and beyond now.
- Improved air tightness... with a target of  $<10\text{m}^3/\text{hr.m}^2$  - There is a couple of issues with this claim as an uplift of sustainability, technically, since the 2019 NCC, there has been a requirement that all Class 1 & 2 buildings meet an airtightness target of  $10\text{m}^3/\text{hr.m}^2$ , although the caveat is that testing is optional... So overall, they are just stating that they will meet minimum compliance with airtightness. So that shouldn't be taken on as a firm commitment to a 'sustainability uplift'. Furthermore, if they were serious of air tightness they would set a target like  $5\text{m}^3/\text{hr.m}^2 @ 50\text{Pa}$ , like Victoria is doing with their social housing. However, that would instigate the need for mechanical ventilation, which is good air quality, but the design doesn't showcase any consideration for spatial needs for this type of HVAC servicing.
- External shading to reduce solar gains - where are the external shading? The balconies shouldn't count to this claim and the precast facade reveal would do very little to protect the east and west facade. Bed rooms to the west looking toward the park will be cooked in the summer, the least they could do is protect those windows with something.
- Maximise views and daylight - I don't have to do a daylight simulation to know that natural daylight in these units will be pretty bad, even if they have floor to ceiling windows in the living/kitchen space. Mostly do balconies recessing the window line and again, majority of balconies are facing south.
- Average 7.5 star NatHERS across the apartments - They haven't attached the NatHERS modelling in the planning submission, so those claims should be dubious. 7.5 star I think would be difficult for a project with mostly south and west facing glass, although it could be argued the balconies are protecting from solar gain... unless they are utilising thermally broken frames, I don't know how they could reduce the heating loads in winter and it'll be really cold in those apartments.

- All electric development with heat pumps for hot water - this is obviously the key move for all developments going forward... but as noted before, the design of this development doesn't seem to allow for any of the services pointed out in the sustainability report, so where is there space for a development heat pump? We all know these take up space, so where is it going to be placed? Majority of the 'nominal infrastructure zone' is identified to be taken up by a transformer. The spatial coordination with services I think are undercooked.
- Reduced embodied carbon - have noted reduction in portland cement, which generally most concrete mixes, against the concrete standard, already have a reduced portland cement content, even without SCM added into the mixes. This is unfortunately a bit of 'language' issue around concrete specification. If they made a commitment to low carbon concrete by identifying carbon per m3 targets or SCM % targets, it would be a legit claim for reducing embodied carbon in materials. Moreso... they should just go with CLT for a 13 storey building right?! 😊

Overall, I do think a lot of the sustainability uplift claims are a stretch, but as you've pointed out, sound good in a planning submission to those that may not fully comprehend the nuances of evaluating the claims.

They aren't doing any more than a minimum compliance really, so if they are trying to get extra height for doing something good, I don't think there is a trade off here. And if they really are claiming a 7.5 star NatHERS, I think they should show the modelling, even if it is just for a couple of the repeated apartments.

*2 further assessment from nationally and internationally practicing, pre-eminent Sustainability Consultants, who work professionally within a pragmatic Services Engineering context, follow...*



*A report from*

***Sustainability Advisor #2***

*an international practice:*

Please see below a few observations regarding the 8 Hocking Place proposal, based on our quick review.

- Lot orientation is beneficial however, the building has blank wall to north and most of the openings on the south side; net effect being a poor outcome.
- Claims of solar PV have to be taken with a pinch (or heap) of salt. The building footprint (and hence the roof area) is so small, compared to the number of occupants/dwellings, that any meaningful contribution from PV is highly questionable, especially considering that if any solar hot water system, or any plant rooms are added on the roof (currently now shown) the availability of roof area for PV diminishes significantly. No lift overrun is shown in the section (roof plan seems to show) above the roofline. Will it cause undesirable overshadowing on the proposed PV system? If so, then again, the PV claims are overstated.
- The whole building has completely internalised or dark common areas, that even during daytime would require constant artificial lighting (although sensors appear to be proposed). Much of the PV generated (from whatever amount of PVs actually end up being installed) will be used up for basic functioning of the common areas of the building.
- Good attempt at 7.5 NatHERS star rating on average, however that also means at least half are close to being the minimum compliance of 7 Stars. Typically apartments should be performing much higher than that considering much more efficient surface to volume ratios that are typically achieved in apartment units. Poor orientation exposure and likely thermally average performing fabric materials could be contributing to such performance. This star rating can not be considered representative of 'excellent sustainability'.
- Having said the above on NatHERS star rating, it is important to understand this relates to only about one metric of sustainability, i.e. carbon. Not even in its entirety, only the operational carbon. Not even the full scope of operational carbon, only the thermal performance aspect. So there is a lot that gets excluded from this scope. If a 'whole of home' type NatHERS rating was completed, then that would have taken the full operational energy/carbon into consideration. So the scope of sustainability captured here is fairly limited.
- How about climate change resilience? From thermally, operational energy, passive survivability considerations, etc. perspectives the project doesn't seem to do much at all.
- These types of claims (p. 6 of Sustainability Planning Statement) are very vague and highly questionable when we can clearly see from the design that neither points are of high performance or defensible:



- Reduce Urban Heat Island Effect through:
  - Low Solar Absorptance roof as per 'Buildings Fabrics' section.
  - Maximising Vegetated landscaping.
- In terms of embodied carbon, only purchase of cement replacement with 30% fly ash is proposed, which in our experience would not even reduce the project's embodied carbon by 5%. And this is only in comparison with a worse performing reference case. The design itself could start from dematerialisation instead of extremely carbon intensive fully concrete base case, which is not the case here. This is far from what we would expect from a project that would claim excellence in sustainability.
- 2/3<sup>rd</sup> of all units between Level 1 and 10 have no capacity for any cross ventilation. Those that have that ability may even keep doors/windows closed due to garbage trucks moving, noise, smells, etc. Which would negate any possibility of natural cross ventilation. Units on levels 11-13 have some cross ventilation possibility (only in living areas). At such height, the wind pressures may become more of a challenge.
- Most units would struggle to get adequate daylight within them. Those that are facing due South will be dark and cold throughout the year. Those on East and West ends will only get solar exposure part of the day, and the rest of the time will likely be quite dark. East and West facades appear to be devoid of any beneficial solar protection/shading, essentially creating extreme unwanted heat gain and heat loss pendulum effect.
- Units on Level 4 have tokenistic planterbeds that appear forced and do not represent any sincere integration within design. Survival of any plants, let alone biodiversity is highly questionable.
- Claims of 'WELS rated taps and sanitaryware' mean nothing. You can get low/poor performing WELS rated fixtures. No high rating is specified. 3kL watertank for such a big building is similarly tokenistic. Not sure of its contribution in any meaningful way.
- Overall, our observation of the proposed scheme is that not only from the environmental sustainability perspective we are not able to call this project demonstrating excellence in sustainability, the project raises significant questions around social sustainability (through its poor natural daylight, cross ventilation, lack of biophilic design qualities, etc.). This is before we start to consider its proposed scale, massing, overshadowing, obstructing to the sky and views from the surroundings/neighbours and the imposing and unsympathetic character of the area.

*Our 3<sup>rd</sup> **statement** of advice from Australia's pre-eminent Sustainability advisor follows...*

Assessment Panel/Assessment Manager at State Planning Commission

I have reviewed the planning application for the proposed development at 8 Hocking Place in the context of:

- My review finds that the proposed building delivers only minimum legislated standards for most measures relating to environmental sustainability and provides a design that fails to optimise passive design and amenities within the site.

The submission repeatedly misrepresents minimum regulated requirements or standard practice as improvements. Nothing in the development is considered to provide a substantial additional gain in sustainability.

The lodged Sustainability Statement also misrepresents the design proposed in the architectural plan set. Electrification and gas-free development are non-negotiable requirements in a contemporary climate-aligned building and, due to their critical importance to climate mitigation, are rapidly approaching standard practice. However, the Sustainability Statement misrepresents the proposed development, which shows the addition of a gas room on the ground floor. The reason for a gas cupboard can only be for future gas supply to the development. In addition to undermining the only meaningful sustainability commitment in the application, the space planning around a gas room has negatively impacted waste management and bicycle storage sustainability outcomes.

Allocating additional space to supply gas to the building in an already very space-comprised floor plan suggests a lack of genuine commitment by the developer to improving sustainability outcomes and a lack of integrated design in preparing the proposal. Both are needed to provide additional substantial gains in sustainability required by the SA Planning & Design Code.

Section 7.7 of the Planning Report refers to a comparative study to benchmark the proposal against 11 other tower developments in the City, where it was observed:

*“The proposed development at 8 Hocking Place, Adelaide will present a significant increase in sustainable design and energy efficiency against minimum practice, particularly compared to the typical sustainability outcomes of the affordable living subset of accommodation.”*

I have not had the opportunity to review the comparative review. However, given my review of the project's commitments described in the application, I can only assume the 11 comparative developments were existing buildings delivered under different societal expectations for sustainability and within a different planning context. Comparing a contemporary planning proposal

ABCDEFGHIJKLMNOPQRSTUVWXYZ

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to a building delivered 10 or 20 years ago is not helpful when considering new construction's environmental impacts and climate mitigation contribution.

The only way to demonstrate a substantial additional gain in sustainability is to assess additionality compared to contemporary expectations, regulations, and practices. The proposal will not provide a substantial additional gain when benchmarked on this basis.



Ché Wall  
Director  
Flux Consultants Pty Ltd

Appendix 1: Additional review comments  
Appendix 2: Review qualifications

## Appendix 1: Additional review comments

The following claims are amongst those found to be misleading in the sustainability commitments schedule in the Sustainability Statement.

**HVAC:** *High efficiency DX units throughout with low GWP R32 refrigerant, a reduction of approximately 70% global warming potential compared to industry typical R410a.*

The statement is very misleading, as R32 is the refrigerant with the highest GWP that be used in small-scale air conditioning. From 1 July 2024, Australia banned importing and manufacturing small air conditioning equipment using a refrigerant with a global warming potential (GWP) of over 750. The R410a used to claim at 70% cannot be lawfully imported into Australia in small compressor air conditioning units. The actual reduction compared to legislated minimum practice is 0%.

A solution led by sustainability improvement would use a refrigerant with a GWP of less than 10 provided from a centralised source. The proposal development increases the Global Warming Potential of the refrigerants used in air conditioning by 700 - 1000% compared to best practice.

**PVs/Embedded Network:** *An embedded network allows for greater operational savings for residents and reduces developer capex costs by offloading costs associated with meters, hot water systems and solar PV.*

This proposal describes a system where electricity meters, hot water generation, and PVs will be sold to a private operator and operated as a business. Privatisation of these assets locks the residents into monopoly providers and denies the future residents contestability of electricity suppliers. This 'offloading' of development costs through locking in residents to monopoly suppliers for hot water and electricity does not improve sustainability outcomes, and the practice has no environmental merit at all at the scale of a single building. Many such arrangements have led to significant financial hardship for future residents.

The claim that the embedded network maximises the self-utilisation of behind-the-meter generation, amplifying the economic benefits to residents, misrepresents how embedded an embedded network operates in this context. The PV panels are not be wired to individual apartments and will only reduce the metered consumption to the gate meter owned by the embedded network company. This arrangement is standard practice, and the apartment occupiers are billed for all energy used in an apartment by the embedded network company/monopoly electricity provider. This full-use billing is necessary to generate the desired financial return on the investment to purchase the PV panels or the access and concession rights from the developer.

Nothing in the application suggests an atypical embedded network is proposed. The practice of reducing developer costs by binding future residents to long-term monopoly supply agreements is particularly harmful in affordable housing, where the cost of living will be negatively impacted by those who can least afford it. This is a developer profit-making exercise without any sustainability merits.

**Energy Efficiency/NatHERS:** *Increased average star rating of 7.5 stars, with each individual apartments required to achieve a minimum of 6 stars, leading to approximately 15% minimum improvement in heating and cooling loads*

The statement is misleading on the environmental additionality of the proposal as the applicant is committing to no more than the regulated minimum of 6-star NatHERS for each apartment. The claimed benefit of a 0.5 uplift in the average star rating is not substantial, and in any event, the energy savings will not be realised as an average of 7.5 is achieved incidentally through a normal approach to NatHERS that achieves a 6-star rating in each apartment.

**Solar heat:** *Double glazing to the Apartments with high performing, low-e coating to control solar gain.*

This proposed development is standard practice. The reliance on low-e coatings to reduce solar heat load is also suboptimal, and a best practice approach to passive solar design would provide physical shading of glass to limit summer heat loads and allow winter heat. A low-e coating provides inferior results as it also reduces passive solar heating in winter and will increase heating demands.

**Materials:** *Reduce embodied carbon impact of the building through:*

- *Nominating concrete with a 30% reduction in Portland cement content for footings, slab, piles and other on-grade applications.*
- *Design with Post-tensioned slabs where possible to reduce the volume of concrete and reinforcing steel.*

This commitment will not provide a material environmental benefit above business as usual.

The commitment to reduce cement content in concrete by 30% for on-grade applications will not deliver a material reduction in embodied energy for the development. A 20-30% reduction in cement is standard practice to balance pour and curing times on site, suggesting low to no environmental additionality from the proposed. The superstructure is excluded from any commitment to reduce the cement content of concrete. As the superstructure will contribute over 50-70% of total embodied emissions, it cannot be omitted where substantial additional gain is to be demonstrated.

Designing with post-tensioned slabs is not a sustainability initiative. It will increase the mass of steel (where no commitment is made even to consider embodied energy), and while it can result in thinner slabs, post-tensioned concrete typically has higher cement content, negating sustainability benefits.

**Increased air tightness:** *providing both improve energy efficiency and health benefits, with a target of <10m<sup>3</sup>/hr.m<sup>2</sup> for a minimum sample of 10% of apartments.*

Increased airtightness provides limited energy efficiency benefits in the Adelaide climate and has been found to be detrimental to health through a loss of ventilation to remove moisture and pollutants. Notwithstanding fundamental concerns with the strategy's merits, the claimed initiative is another example of misrepresenting best practices as the commitment is no different from the required standard in NCC 2022 J1V4 Verification of building envelope sealing in a Class 2 building.

**Waste:** *Minimum 3 streams of waste collection for reduced landfill in operation*

- *Organics*
- *Commingled Recycle*
- *General Waste*
- *Include additional waste stream for one of the following: e-Waste, Bulky goods or Batteries.*

Waste should not be put forward as a sustainability strategy, given that the project provides no infrastructure to improve waste separation and management. The system does not provide on-floor disposal opportunities for residents; instead, each resident relies on the lift to manually transport waste to the central waste room. Equitable on-floor disposal is a prerequisite for segregated waste management in a 14-story building.



Further, the Waste Management Plan does not make any reference to any space or infrastructure for e-waste, bulky goods, or batteries, and no space is allocated in the very tight waste store shown on the architectural plans.

**Sustainable Transport:** *Site is in close proximity to public transport and bike paths, reducing carbon emissions associated with transport and promoting healthier lifestyles*

- *Bike storage/hoops to be included for visitors and storage for residents to be provided to maximise potential for active transport modes*

The Sustainability Statement presents a very poor site response as a sustainability initiative. Only 6 bicycle racks are provided to support 36 apartments. It is not clear how these racks would be allocated. Given the proposal's proximity to bike paths, this provision is completely inadequate..

The other commitments, except electrification, represent smaller impact areas but are all similar in proposing a solution that we cannot differentiate from business as usual.

Electrification is one initiative that will provide environmental benefits. However, this is becoming business as usual, and the commitment contradicts the proposed plans, which include a new gas cupboard. The provision of a gas cupboard is not accidental and fatally undermines the commitment to a gas-free development. It has also compromised space planning to support bicycle storage and waste management.

**Passive Design**

The design exhibits significant compromise to passive design and amenity due to the lack of setback and articulation in the building envelope.

The north facade of a building typically provides the best environmental amenity for occupants, but the proposal provides no access to light or air to habitable spaces in the majority of the tower due to proximity to the boundary,

Windows on the east and west aspects are not provided with solar control and will be sources of thermal discomfort in warmer months.

The southern aspect has the most glazing but does not receive winter sun.

The dual-aspect opportunity for natural cross ventilation is also compromised by not providing openings on the opposite aspect of apartments. The corner design provides about 50-60% less cross ventilation than a cross-through design would.



### Professional Affiliations

Lead Specialist for Low Carbon Buildings, Climate Bonds Initiative, London

Member, City of Sydney Design Advisory Panel

Member, NSW State Design Review Panel

Member, Sydney North Regional Planning Panel (North Sydney)

### Awards

**2010 Chairman's Award**, World Green Building Council

**2008 Life Fellow** of the Green Building Council of Australia

**2007 Sustainability Champion of the Year**, Building Services Journal (UK)

**2006 True Leader**, Australian Financial Review BOSS

**2004 Prime Minister's Environmentalist of the Year**, Banksia Environmental Foundation

**2004 National Exemplar** ING Real Estate Year of the Built Environment Towards Sustainable Communities

**2002 RIAA President's Award** for Outstanding Contribution to the Architectural Profession

### Profile – Ché Wall, Director

Ché has an unparalleled depth of sustainability experience within the built environment, with a raft of award-winning projects to his name.

Ché is a Director of Flux Consultants – a boutique consulting and advisory business providing world-leading sustainable design and delivery expertise on sustainable buildings, urban regeneration, green infrastructure projects and related policy development. Flux works on projects at both micro and macro scale, with a positive environmental ambition being the unifying theme.

Ché currently provides expert advisory services on the delivery of sustainability on significant projects to many state and local government agencies, including Infrastructure NSW, the City of Parramatta and the City of Sydney. Ché remains active in project design and delivery with a focus on public buildings with challenging environmental design briefs.

Ché also serves as lead expert for buildings with the Climate Bond Initiative in London and was lead author for the Climate Bond property standard, which has been used for certification of Climate Bonds with a value of over US\$45bn. This role ensures Ché maintains a contemporary understanding of World's Best Practice assessment and analysis of built environment sustainability, with recent benchmarking being undertaken in localities as diverse as China, New York, Netherlands and Singapore.

Ché provides expert witness services to the NSW Land and Environment Court in the areas of Environmental Sustainability, Natural ventilation and Solar reflectivity

### Work History

Ché founded Flux with long-term collaborator Matthew Jessup in 2012.

Ché joined Lincolne Scott in Sydney upon arrival in Australia in 1993. In 1996 he led its creation of Australia's first professional practice dedicated to sustainable design – then Advanced Environmental Concepts, now WSP Built Ecology. In 1999 he joined the group board of Lincolne Scott, and in 2005 he was appointed Managing Director. In July 2007, the firm undertook a trade sale to WSP Group plc, where Ché remained in the role until 2010.

Ché was the founding Chair of the World Green Building Council from 2002 to 2007. During that time, he oversaw Green Building Councils' formation in China, the United Arab Emirates, the United Kingdom, Mexico, Germany and New Zealand.

In 2002 he co-founded the Green Building Council of Australia and oversaw the creation of the Green Star environmental rating system for buildings. Ché remained a Director of the GBCA until 2010.

Ché was a member of the Clinton Climate Initiative Climate Positive Development Program for precincts advisory board from 2009-2010.

In 2007, the American Institute of Architects' journal, Architectural Record, named Ché one of the 6 most influential living engineers globally.

## Select Awarded Projects

**The Rockhampton Museum of Art (RMOA) QLD**

Sir Zelman Cowen Award, Australian Institute of Architects 2023

**Green Square Creative Centre, Sydney NSW**

NSW Architectural Medallion and Sustainable Architecture Award, Australian Institute of Architects 2018

**Museum of Old and New Art (MONA), Hobart TAS**

Sir Zelman Cowen Award, Australian Institute of Architects 2012

**Gallery of Modern Art, Brisbane QLD**

Public Architecture Award, Royal Australian Institute of Architects 2007

**Southern Cross Station, Melbourne VIC**

Royal Institute of British Architects Lubetkin Prize 2007

**CH2, Melbourne VIC**

CIBSE Sustainable Building of the Year Award 2007

CRC Construction Innovation, Year of the Built Environment 2004

**30 The Bond, Sydney NSW**

RAIA Energy Efficiency / ESD Award 2005

**Birabahn Aboriginal and Torres Islander Centre**

Sir Zelman Cowen Award, Australian Institute of Architects 2003

**Dunc Gray Velodrome, Bankstown NSW**

RAIA Energy & ESD National Award 2001

**Pavilions, Sydney Showground, NSW**

RAIA NSW Chapter ESD Award 1999  
RAIA Energy & ESD National 1999

## Select Project Experience

**Australian Sustainable Finance Taxonomy - Client: ASFI/Treasury (2024 - 2025)**

Ché led the development of the building sector criteria of the taxonomy, which required characterisation for 2050 climate-aligned and transition activities associated with new construction, acquisition and ownership, renovation and supply chain with the built environment.

**Parramatta Sustainability Advisory - Client: City of Parramatta (2016 - ongoing)**

Ché is engaged to provide expert advice to Parramatta. The advisory services include technical review of design competitions and DA applications in addition to the strategic development of programs and controls to address Urban Heat Island effects, electrification, sustainable delivery of services and other emerging challenges.

**Campsie and Bankstown Sustainability Study - Client: City of Canterbury-Bankstown (2020)**

Ché led Flux's work to baseline the two strategic centres' environmental footprint and develop strategies to support the adopted LSPS employment and residential growth targets and GHG mitigation targets. The work included a review of the current sustainability bonus scheme with the LEP. Recommendations have been complemented with a suite of objective and assessable controls for the amended DCP.

**Alternative Natural Ventilation guidelines - Client: City of Sydney**

Ché led Flux's work to develop a performance pathway for natural ventilation in noise-impacted environments. The guideline was developed with reference to global best practice guidelines for indoor air quality and a detailed analysis of natural ventilation flows over time in a range of apartment topologies.

**Rockhampton Art Gallery - Client: Conrad Garget / Rockhampton Regional Council (2017 - 2019)**

Ché was engaged to support the design team in balancing the needs of conservation and sustainable design. Natural light and solar ingress were areas of particular concern due to their impact on conservation. Testing was conducted that ranged from simple solar exposure testing to the prediction of lux-hour exposure for specific galleries' walls.

**State Square Art Gallery, Darwin (2021 - ) - Client: Ashford Architects / DIPL**

Ché led Flux's contribution to the design team to deliver a significant new gallery in Darwin that is aligned with the NT government's net zero emissions trajectory. Flux worked closely with the architects and the services engineers to deliver an environmental design response that delivers efficient operation and satisfies strict environmental control requirements.

**Green Building Council of Australia (2001-2010)**

Ché was co-founder of the Green Building Council of Australia (GBCA) and chaired the technical steering committee and technical working group that developed Green Star. Ché remained a board member until 2010 and chair of the Technical Steering Committee until the release of Green Star version 3.0 in 2008. This formative period for the GBCA required extensive stakeholder consultation to deliver very progressive tools into the market.

## A Review of Sustainability Assessment Frameworks

Tropo Architects July 2024

In recent decades, in teasing out sustainability parameters that shape the triple bottom line of environment, economy and society – or the Aboriginal notion of the intersection of environment, its resources and our human spirit – much has been considered and written, and at high levels...

In 1992, at the Earth Summit in Rio de Janeiro more than 178 countries adopted Agenda 21, a comprehensive plan of action to build a global partnership for sustainable development to improve human lives and protect the environment. In 2015 by all United Nations Member States adopted [The 2030 Agenda for Sustainable Development](#), a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are 17 Sustainable Development Goals, which are an urgent call for action by all countries in a global partnership. They recognize that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests.

The 17 Sustainable Development Goals are:



It is in the context of this potentially broad and synergistic impact of ESD actions that Sustainable Development assessment methodologies ought to be framed.

### Sustainability: its measuring

Australia's very Building Code and Development Plans (including Kangaroo Island's Planning and development Code) demand development acknowledges and responds to energy efficiency/ reduction of greenhouse gas emissions, water conservation and control of pollution; as well as addressing considerations for health, public realm safety and amenity.

Australian Codes can offer a 'Community benchmark' for some ESD topics, against which some ESD initiatives over and above regulated requirements can be measured. Section J is one such benchmark.

### **Section J**

The Building Code of Australia's National Construction Code (NCC) for commercial and public buildings requires the meeting of energy efficiency standards through construction detail. These requirements are covered through Section J of the NCC. Compliance with those requirements is a prerequisite to Building Approval, usually requiring professional engineering engagement.

NatHERS is a companion assessment framework that underpins the NCC for meeting energy efficiency requirements in dwellings. Its compliance will lead to a star rating for the assessed building(s).

Beyond these mandated assessments, there are diverse commercially available programs and tools that purport to enable such measurement. Some are governments(s) sponsored, well regarded and in some instances widely internationally used.

*Commencing with Australian and State Government sponsored measures...*

### **NABERS and BEEC**

NABERS is a national initiative managed by the NSW Government on behalf of the Federal, State and Territory governments of *Australia*.

"At NABERS, we know that environmentally friendly buildings are not only better for the planet, but they also make happier and healthier spaces that we can all thrive in."

[www.nabers.gov.au](http://www.nabers.gov.au)

NABERS provides a rating from one to six stars for buildings efficiency across:

Energy

Water

Waste

Indoor environment

"This helps building owners to understand their building's performance versus other similar buildings, providing a benchmark for progress... Ratings are valid for twelve months: this annual model helps ensure that your rating represents a building or workplace's current operational performance. A NABERS rating helps building owners to accurately measure and communicate the environmental performance and progress of buildings. It also identifies areas for savings and improvements.

[www.energy.gov.au](http://www.energy.gov.au)

NABERS has [also] partnered with Climate Active\* to provide a Carbon Neutral certification.

\*Climate Active is an ongoing partnership between the Australian Government and Australian businesses to drive voluntary climate action.

[www.climateactive.org.au](http://www.climateactive.org.au)

### **BEEC**

Established by the *Building Energy Efficiency Disclosure Act 2010*, the Commercial Building Disclosure is managed by the Australian Government Department of Climate Change, Energy, the Environment and Water. As such it is a mandatory program and requires energy efficiency

information to be provided when commercial office space of 1000 square metres or more is offered for sale or lease. The aim is to improve the energy efficiency of Australia's large office buildings, and to ensure prospective buyers and tenants are informed.

Compliance requires the furnishing of the results of a Building Energy Efficiency Certificate (BEEC) to prospective tenants or building buyers. The [BEEC](#) involves 3 components: a NABERS base building energy efficiency rating, a tenancy lighting assessment, and behavioural energy efficiency guidance. A BEEC is valid for 12 months.

### **SDAPP**

SDAPP (Sustainable Design Assessment in the Planning Process) is a Victorian Government sponsored and CASBE\* developed assessment methodology, integrated in Victoria's Development Approval process in subscribing Council areas. Beyond an individual building's performance within its immediate site context, it requires consideration of impacts within the broad urban context in which it is proposed.

"Where applied it is mandatory to achieve satisfactory compliance in all buildings. Approximately two thirds of Victorian Councils are now implementing the Sustainable Design Assessments.

The SDAPP process requires satisfactory completion of a Sustainable Design Assessment (SDA) or Sustainability Management Plan (SMP) report, which incorporate the BESS (Built Environment Sustainability Scorecard) report along with previous residential energy ratings or a preliminary Section J report, as well as a water sensitive urban design assessment using Melbourne Water's STORM tool or similar.

Against set benchmarks the BESS assessment tool is designed to evaluate:

- Management
- Water
- Energy
- Stormwater
- Indoor Environment Quality
- Transport
- Waste
- Urban Ecology

BESS is used as an input for Sustainable Design Assessment (SDA) reports or Sustainability Management Plans for development projects in Victoria quickly becoming the Victorian equivalent of BASIX in New South Wales. More local councils are beginning to require ESD assessments at the planning permit stage of the development cycle."

[www.certifiedenergy.com.au](http://www.certifiedenergy.com.au)

\*CASBE is an independent alliance of councils in Victoria, operating under the auspices of the Municipal Association of Victoria.

\*\* "STORM can be used to assess whether best practice water quality objectives have been achieved for your site. Results of assessments can be submitted to statutory authorities along with development applications to demonstrate compliance with objectives.

Achievement of a 100% STORM rating means you have achieved a 45% reduction in the typical annual load of total nitrogen and achieved best practice objectives. To improve your rating you



need to provide treatment for impervious surfaces that currently have no treatment or increase the size of existing treatments.”

[www.storm.melbournewater.com.au](http://www.storm.melbournewater.com.au)

BASIX, which covers energy efficiency and water conservation, is the longer standing NSW mandatory sustainability assessment framework, but applies only to dwellings.

Beyond Design & Planning Code guidance (for Development Approval Planning Consent) and NCC requirements (for Full Development Approval, or ‘Building Approval’), South Australia has no specific mandatory ESD compliance framework.

*Programs in wider, international use include:*

### **LEED**

**LEED** (Leadership in Energy and Environmental Design) *is the world's most widely used green building rating system in the world. Available for virtually all building types, LEED certification provides a framework for healthy, highly efficient, and cost-saving green buildings, which offer environmental, social and governance benefits. LEED certification is a globally recognized symbol of sustainability achievement and leadership.*

LEED assessment is controlled by the USGBC, through which assessors can be accredited to undertake LEED ratings. LEED is assessed by rating how the building complies with certain sustainability goals that the USGBC has outlined as stated above.

### **BREEAM**

BREEAM (Building Research Establishment Environmental Assessment Method) is a UK based framework which includes for international application. It was first published by the [Building Research Establishment](#) in 1990,<sup>[1]</sup> is the world's longest established method of assessing, rating, and certifying the [sustainability](#) of buildings. More than 550,000 buildings have been 'BREEAM-certified' and over two million are registered for certification in more than 50 countries worldwide.

BREEAM New Construction is the BREEAM standard against which the sustainability of new, non-residential buildings is assessed. Developers and their project teams use the scheme at key stages in the design and procurement process to measure, evaluate, improve and reflect the performance of their buildings.

BREEAM In-Use is a scheme to help building managers reduce the running costs and improve the environmental performance of existing buildings.

BREEAM has grown to broaden its ESD measurement goals to include for ‘BREEAM Communities’, which focuses on the [masterplanning](#) of whole communities.<sup>[8][9]</sup> It is aimed at helping construction industry professionals to design places that people want to live and work in, are good for the environment and are economically successful.

BREEAM includes several general sustainability categories for the assessment:

- Management
- Energy
- Health and wellbeing
- Transport
- Water
- Materials
- Waste
- Land use and ecology
- Pollution

## **Green Star**

Founded by Green Building Council of Australia in 2003, and evolving since, this assessment system seeks a more holistic approach, with some consideration for the triple bottom line, and considerations of education, health and wellbeing...

*“Green Star is an internationally recognised rating system setting the standard for healthy, resilient, positive buildings and places. Developed for the Australian environment, Green Star has certified thousands of sustainable fitouts, buildings, homes and communities right across the country,*

- Reducing the impact of climate change*
- Enhancing our health and quality of life*
- Restoring and protecting our planet’s biodiversity and ecosystems*
- Driving resiliency in buildings, fitouts, and communities*
- Contributing to market transformation and a sustainable economy*

*Green Star assesses and rates buildings, interiors and communities against a range of environmental impact categories that align with Sustainable Development Goals:*

*Responsible: Recognises activities that ensure the building is designed, procured, built and handed over in a responsible manner.*

*Healthy: Promotes actions and solutions that improve the physical and mental health of occupants.*

*Resilient: Encourages collaboration and engagement solutions that address short-term shocks and long-term stresses by improving the capacity of communities, businesses and assets to adjust, respond and thrive in the face of adversity.*

*Positive: Makes a positive contribution towards better buildings by focusing on key environmental issues of carbon, water consumption and the impact of materials.*

*Places: Supports the creation of safe, enjoyable, inclusive and comfortable places that are integrated into the broader urban fabric and enable communities to connect and thrive.*

*Nature Encourages active connections between people and nature and creates opportunities to deliver new natural corridors and green spaces in cities.*

*Leadership: Recognises projects that set a strategic direction, build a vision for industry or enhance the industry’s capacity to innovate.*

*People: Encourages solutions that address the social health of the community.”*

Green Building Council of Australia, 2023

## **One Planet Living**

*“The [One Planet Living tool](#) is an alternative to Green Star, and like Green Star is suitable for larger projects. It takes a similar amount of effort to manage this certification process as a Green Star certification process. The One Planet Living tool is more goals focused...”*

*We believe this tool is more prestigious than achieving Green Star certification as it is more demanding in terms of carbon neutrality and zero waste, more flexible, better able to align with sustainability goals and targets, and delivers a more holistic result than the Green Star Design & As Built tool. The One Planet Living framework should keep the focus on the outcomes more than the certification documentation.*

*We also note that achieving a 5 or 6 star Green Star certification will not necessarily meet the requirements of carbon neutral goals or frameworks. Green Star certification can be achieved without being carbon neutral.*

*Ecological and/ or carbon footprinting will be required to be measured with One Planet Living. In addition other social, financial and environmental indicators are required to be nominated by the project team and monitored and reported on to ensure continued compliance for a three year period.*

*One Planet Living (OPL) is a framework established by the world leading team the [ZED factory](http://www.zedfactory.co.uk) in the UK.”*

[www.lidconsulting.com.au](http://www.lidconsulting.com.au)

### **EnviroDevelop**

*“[EnviroDevelop](http://www.envirodevelop.com.au) (ED) is [another] alternative sustainability tool to Green Star that includes many similar goals. An established tool, it is substantially less expensive, faster and easier to implement than Green Star. The ED process is likely to take 3 months rather than 2 years as occurs with Green Star and accordingly is significantly less expensive.*

*The tool is more commonly used on masterplanned communities and subdivisions, although it is also suitable for other building types: Seniors Living, Multi-Unit residential, Mixed Use, Industrial, Retail, Education, Health and Aged Care...*

*There are 6 elements to address in ED: Ecosystems, Community, Energy, Water, Waste, Materials. Currently only 4 of the 6 elements are required to be completed to achieve the minimum 4 leaf rating. The tool sets goals and requires statements to support how these have been met. It is not prescriptive, and [relatively] flexible.”*

[www.lidconsulting.com.au](http://www.lidconsulting.com.au)

### **WELL Building Standard**

***“We believe that buildings should be developed with people’s health and wellness at the centre of design. The WELL Building Standard takes a holistic approach to health in the built environment addressing behavior, operations and design. WELL is a performance-based system for measuring, certifying, and monitoring features of the built environment that impact human health and well-being, through air, water, nourishment, light, fitness, comfort and mind.”***

**Air:** Optimize and achieve indoor air quality. Strategies include removal of airborne contaminants, prevention and purification.

**Water:** Optimize water quality while promoting accessibility. Strategies include removal of contaminants through filtration and treatment, and strategic placement.

**Nourishment:** Encourage healthy eating habits by providing occupants with healthier food choices, behavioral cues, and knowledge about nutrient quality.

**Light:** Minimize disruption to the body’s circadian rhythm. Requirements for window performance and design, light output and lighting controls, and task-appropriate illumination levels are included to improve energy, mood and productivity.

**Fitness:** Utilize building design technologies and knowledge-based strategies to encourage physical activity. Requirements are designed to provide numerous opportunities for activity and exertion, enabling occupants to accommodate fitness regimens within their daily schedule.

**Comfort:** Create an indoor environment that is distraction-free, productive, and soothing. Solutions include design standards and recommendations, thermal and acoustic controllability, and moderating acoustic and thermal parameters that are known sources of discomfort.

**Mind:** Support mental and emotional health, providing the occupant with regular feedback and knowledge about their environment through design elements, relaxation spaces, and state-of-the-art technology.

WELL also offers more operationally based assessment systems with further prompts for improved building design, including for measures that reinforce ESD goals. The assessments and their considered topics are:

*Health-Safety Rating:*

- Cleaning and Sanitization Procedures
- Emergency Preparedness Programs
- Health Service Resources
- Air and Water Quality Management
- Stakeholder Engagement and Communication

*Equity Rating:*

- User Experience and Feedback
- Responsible Hiring and Labor Practices
- Inclusive Design
- Health Benefits and Services
- Supportive Programs and Spaces
- Community Engagement

*Performance Rating:*

- Indoor Air Quality
- Water Quality Management
- Lighting Measurement
- Thermal Conditions
- Acoustic Performance
- Environmental Monitoring
- Occupant Experience

*“WELL applies the science of how physical and social environments affect human health, well-being and performance. Developed over 10 years and backed by the latest scientific research, WELL outlines key building-level and organizational strategies...”*

[www.wellcertified.com](http://www.wellcertified.com)

**Living Building Challenge**

The Living Building Challenge (LBC) is one such more holistic tool, and includes for user/building operator engagement and post-occupancy evaluation. It is held in high regard, with assessment required to be carried out by accredited professionals (at significant cost).

LBC posits: *“Imagine a building designed and constructed to function as elegantly and efficiently as a flower: a building informed by its bioregion’s characteristics, that generates all of its own energy with renewable resources, captures and treats all of its water, and that operates efficiently and for maximum beauty”.*

[www.living-future.org](http://www.living-future.org)

The Living Building Challenge is composed of 20 Imperatives grouped into seven ‘petals’ (refer over):

PETAL	IMPERATIVE	
PLACE		01 Ecology of Place
		02 Urban Agriculture
		03 Habitat Exchange
		04 Human Scaled Living
WATER		05 Responsible Water Use 
		06 Net Positive Water 
ENERGY		07 Energy + Carbon Reduction
		08 Net Positive Energy
HEALTH + HAPPINESS		09 Healthy Interior Environment
		10 Healthy Interior Performance
		11 Access to Nature
MATERIALS		12 Responsible Materials
		13 Red List
		14 Responsible Sourcing
		15 Living Economy Sourcing
		16 Net Positive Waste
EQUITY		17 Universal Access
		18 Inclusion
BEAUTY		19 Beauty + Biophilia
		20 Education + Inspiration

 CORE IMPERATIVE  
 SCALE JUMPING ALLOWED  
 HANDPRINTING IMPERATIVE

Expanding notions of Sustainability into the realms of ‘Health + Happiness’ and ‘Beauty’, and topics that include ‘Access to Nature’ and ‘Education + Inspiration’ concurs with the UN’s sustainability goals of ‘Health and Wellbeing’ and ‘Quality Education’.

We’d say that it is not just possible – but for greatest societal benefit – that contemporary development treads softly in its setting, fittingly, beautifully – inspiringly.

The significant emphasis within LBC and the WELL tool on ‘equity’ also supports opportunities that the act of development brings for broad community development and improvements in social justice. Again, these notions also concord with UN ambitions for Sustainable Development.

These approaches to ESD represent a significant movement *beyond* ESD topics embodied within Australia’s Planning and Building Codes – those of energy efficiency/ reduction of greenhouse gas emissions, water conservation and control of pollution.

This shift of focus leads to consideration of the notion of ‘Regenerative Development’...

## Regenerative Development

*“Regenerative Development is an approach that encourages communities to support and create positive relationships that will benefit society and our environments by allowing the system to evolve and adapt to changing circumstances, ...emerg[ing] from an ecological mindset by embracing uncertainty and change. It moves away from the idea ‘control’... Instead, it learns from nature and understands that diverse strategies acting in unison are key elements to create an adaptable and resilient environment (and development). Most importantly, it views the world from a holistic perspective. That is, this framework understands that every issue has many interacting factors contributing to it; thus, any attempt to improve the situation must act across different scales and elements.”*

Christine Hernandez, University of Melbourne, 2019

### **Centre for Living Environments and Regeneration**

*“Centre for Living Environments and Regeneration (CLEAR) has developed an approach to regenerative development that focuses on the ‘relational flows’ through a given place. CLEAR has developed a special LENSES tool, that communities and organisations can use to explore what regeneration means for them and their projects. The goal is to ‘cultivate the capacity and capability in people, communities and other natural systems to renew, adapt and thrive... by creating beautiful, living environments’. The framework is stewarded by four grounding principles:*

- 1. From Separate to Aligned with Nature*
- 2. Being of Service*
- 3. Account for Uniqueness*
- 4. From Scarcity to Abundance*

[www.thefifthstate.com.au](http://www.thefifthstate.com.au)

*“LENSES provides a structured process for seeing and realizing the full potential of a project or program. It is not a checklist or a rating system, but rather a facilitated step-by-step process for regenerative development. Simply put, regeneration is about increasing vitality, viability, and capacity to evolve.”*

[www.clearegeneration.org](http://www.clearegeneration.org)

## Specific measures of Sustainability

Within the more holistic ways of considering sustainability lie 2 more specific approaches that merit consideration and understanding. Effectively, they mark two poles of empiricism, but each has merit in processing the merit a project’s sustainability.

### **Biophilic Design**

*“In every walk with nature one receives far more than one seeks.”*

John Muir, 1877

*“Biophilic design is the practice of connecting people and the natural world... within our built environments and communities. If we think about design as creatively solving the puzzle of look, feel and function, then biophilic design turns to nature for solutions. It is intuitive and fundamental to good design at every step, not an aesthetic trend or afterthought – it’s a way of*



*thinking and working... Biophilic design in the built environment is an expression of the relationship between nature, human biology and buildings. It requires a sensory approach to the act of design that considers what a place looks, smells and feels like over time.*

*Buildings designed with biophilic design as a foundational philosophy are experienced, not just used. They allow humans to gain the benefits of living in spaces that foster a connection to nature.”*

[www.living-future.org.au/biophilic-design](http://www.living-future.org.au/biophilic-design)

*“Biophilic design can reduce stress, improve cognitive function and creativity, improve our well-being and expedite healing; as the world population continues to urbanize, these qualities are ever more important. Given how quickly an experience of nature can elicit a restorative response, ...biophilic design is essential for providing people opportunities to live and work in healthy places and spaces with less stress and greater overall health and well-being.”*

[www.terrapiinbrightgreen.com](http://www.terrapiinbrightgreen.com)

Terrapin Bright Green is a New York based sustainability consulting firm, who frame their work around 14 patterns of inclusion (‘14 Patterns of Biophilic Design: Improving Health & Well-Being in the Built Environment’ Terrapin Bright Green, 2014-):

### **Nature in the Space:**

#### Visual Connection with Nature

*A view to elements of nature, living systems and natural processes.*

#### Non-Visual Connection with Nature

*Auditory, haptic, olfactory, or gustatory stimuli that engender a deliberate and positive reference to nature, living systems or natural processes.*

#### Non-Rhythmic Sensory Stimuli

*Stochastic and ephemeral connections with nature that may be analysed statistically but may not be predicted precisely.*

#### Thermal & Airflow Variability

*Subtle changes in air temperature, relative humidity, airflow across the skin, and surface temperatures that mimic natural environments.*

#### Presence of Water

*A condition that enhances the experience of a place through the seeing, hearing or touching of water.*

#### Dynamic & Diffuse Light

*Leveraging varying intensities of light and shadow that change over time to create conditions that occur in nature.*

#### Connection with Natural Systems

*Awareness of natural processes, especially seasonal and temporal changes characteristic of a healthy ecosystem.*

### **Natural analogues:**

#### Biomorphic Forms & Patterns

*Symbolic references to contoured, patterned, textured or numerical arrangements that persist in nature.*

#### Material Connection with Nature

*Material and elements from nature that, through minimal processing, reflect the local ecology or geology to create a distinct sense of place.*

#### Complexity & Order

*Rich sensory information that adheres to a spatial hierarchy similar to those encountered in nature.*

### **Nature of the space:**

#### Prospect

*An unimpeded view over a distance for surveillance and planning.*

#### Refuge

*A place for withdrawal, from environmental conditions or the main flow of activity, in which the individual is protected from behind and overhead.*

### Mystery

*The promise of more information achieved through partially obscured views or other sensory devices that entice the individual to travel deeper into the environment.*

### Risk/Peril

*An identifiable threat coupled with a reliable safeguard.*

## **Carbon Neutral development**

The ambition of Carbon Neutral (or Nett Zero) development rests on countering the carbon footprint of all of a development's CO2 emissions through:

- reduction of emissions (eg. efficient green technologies, renewable energy sources); and/ or
- sinking of CO2 (eg. natural through foresting and mechanical through dedicated sequestration); and/ or
- offsetting targets (eg. indirectly through cross-sector shifts of onus).

This sits within the context of diverse national and global initiatives, for example:

*"The European Union is committed to an ambitious climate policy. Under the Green Deal it aims to become the first continent to remove as many CO2 emissions as it produces by 2050. This goal became legally binding when [the European Parliament and Council adopted the Climate Law in 2021](#). The EU's interim emission reduction target for 2030 was also updated from 40% to at least 55%."*

[www.europarl.europa.eu](http://www.europarl.europa.eu)

The Australian Government has recently legislated to deliver an Australian CO2 emissions reduction target of 43 per cent, with nett zero emissions by 2050.

Closer to home, Adelaide City Council has embarked on 'a shared vision' to be one of the world's first carbon neutral cities...

*"To achieve our goal, individuals, businesses and as a community, we need to rapidly reduce our carbon emissions. The City of Adelaide will showcase the economic, social and environmental opportunities of responding to climate change, including the uptake of renewable energy and clean, smart technologies. These leading examples could attract new investment to the city, North Adelaide and the State while creating opportunities for local business, innovation and new industries... Through our shared commitment to Carbon Neutral Adelaide, we will prosper in a low carbon economy."*

[www.carbonneutraladelaide.com.au](http://www.carbonneutraladelaide.com.au)

In response to government and corporate ambitions to work toward/ achieve carbon neutrality, commercial actors have risen to act as enablers, offering suites of carbon reduction products and services, which might include:

- [Carbon Footprint Consultancy](#)
- [Local/ national/ international carbon credits](#)
- [Forestry and biodiversity project contributions/](#) partnerships
- [Carbon Farming](#) (management/ reduced burn programs) contributions/ partnerships

Whilst the achievement of carbon neutrality is a laudable measure of sustainable development/ activity, it is narrowly concerned with a development's energy equation (embodied, inputs and efficiencies in use), and stops short of the wider goals of ESD and especially regenerative

practice. Furthermore, the ability to offset development impacts offsite lowers the bar for sustainable development achievement on site.

Assessment methods and tools that do concern with *on-site only* drivers for sustainability are discussed below...

### **LETI**

“The Embodied Carbon Primer offers supplementary guidance to the Climate Emergency Design Guide, for those interested in exploring embodied carbon in more detail... [The] document is intended to provide designers including architects, engineers, interior designers and urban designers with easy-to-follow best practice and toolkits for reducing embodied carbon in buildings. The document can also aid planners to be aware of strategies available to designers to reduce embodied carbon in building design, and how planning recommendations on materials, massing and treatment of sites may affect embodied carbon.”

(LETI (London Energy Transformation Initiative) was established in 2017 and is a network of over 1,000 built environment professionals “working together to put the UK on the path to a zero carbon future”.)

### **RIBA 2030 Climate Challenge**

The Royal Institute of British Architects (RIBA) has developed the 2030 Climate Challenge framework which is heavily based on targets to be met by 2025 and then 2030 within the metrics of energy, embodied carbon, water and healthy air.

Whilst this framework does not seek carbon neutrality its goals are pragmatic and totally development-based, with (as for Carbon Neutrality) reduced embodied energy a cornerstone element: it has a high level of ‘tangibility’, and acts as a ready framework for sustainability focused decision-making in the design process.

### **SCORS**

Inspired by these programs, a useful measuring tool has recently been developed to quantify carbon impacts through the civil and structural engineering layers of construction. It is the Structural Carbon Rating Scheme (SCORS), and is developed “to encourage Engineers to adopt carbon targets for their projects”.

From research, with reference to the LETI primer and the RIBA 2030 Carbon Challenge, it posits traditional construction benchmarks and ambitious targets, culminating in an A++ for embodied carbon.

17 April 2025

Mr PN Harris  
Troppo Architects  
28 East Terrace  
Adelaide  
SA

---

Dear Phil

**Residential flat building: 8 Hocking Place Adelaide**  
**Application ID: 24042402**

Thank you for seeking my opinion on the proposed development, located in the south east corner of Whitmore Square.

The proposal is to demolish an existing single storey concrete block warehouse residence and the construction of a residential flat building that is 46300mm high.

The site is bounded on the west, east and south sides by public spaces of varying widths. Hocking Place is dimensioned as being 4325mm wide and the Public Lane to the east at 3050mm wide. These provide access to the fine grained, low scale city residential development, interconnected by narrow lanes, between Sturt and Gilbert Street, that form part of the intriguing character of the south west corner of our city.

The splayed corner to the rear of the Subject Site says much about the tightness of access and the past willingness of neighbours to work together. Notably the proposal is built boundary to boundary and the splayed corner lost.

To the south, across the 4325mm wide Hocking place, are identified Heritage Places. To the west is the treed corner of Whitmore Square, peacefully excised from the Morphett Street traffic. Heritage Places are identified on the east, west and south sides of Whitmore Square. The east side in particular has a visually strong and consistent row of heritage places, that are knitted together with the more recent Ecohousing. Heritage Places are also identified in Gilbert and Sturt Streets.

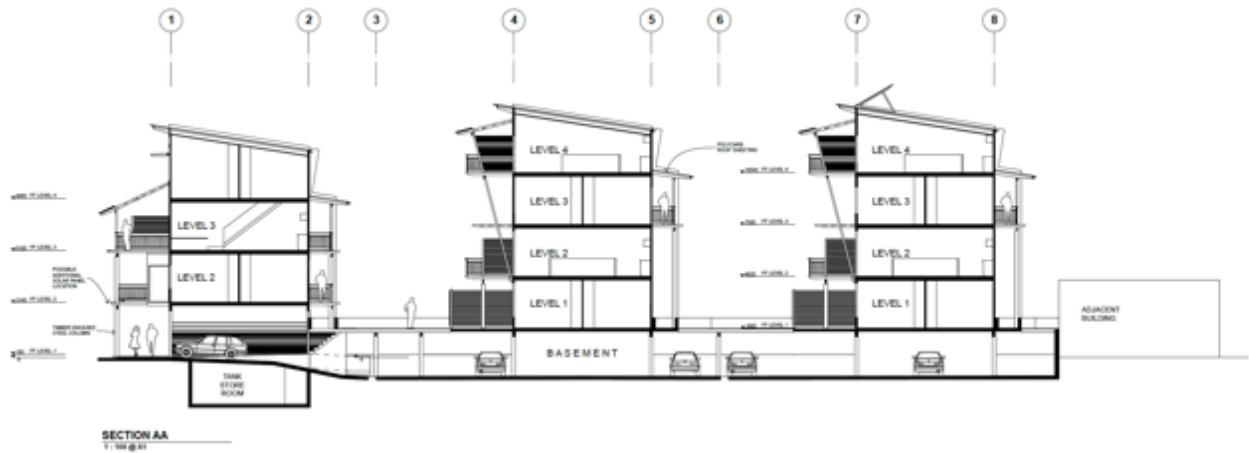
The resultant Planning and Design Code Heritage Adjacency Overlay acknowledges those Heritage Places and heralds the need for respectful contextual design, without discouraging innovation. The Planning Report forming part of this application acknowledges the Overlay, but does not provide any consideration of the impacts of this proposal on Heritage Value, that the Code invites.

The Heritage Adjacency Overlay, while not continuous, is threaded around and across from the subject site from Gilbert Street to Sturt Street, an acknowledgment that the subject site forms part of a fine grained, relatively low rise, small scale network of inner city heritage that extends further than the immediate adjacency across the narrow Hocking Place.

To the north is the established Ecohousing designed by Troppo Architects, that was considerate of 8 Hocking Place, by setting back the south wall in anticipation of a similar exemplar sustainable

Sir James Irwin President's Medal recipient 2018  
Registered Architect SA 877  
Registered Architectural Practice SA 3877  
Registered Architect Victoria 17543  
Phone: 61 418814593  
New email: [douglas@dah.net.au](mailto:douglas@dah.net.au)

development. This potential opportunity of a northern aspect has been ignored by the proposed development which has a mostly solid northern wall.



The drawings forming part of this application fail to demonstrate a comprehensive understanding of the broader context and provide a meaningful architectural site or contextual analysis. The proposal seeks to maximise development of this very small, but key site at the expense of the broader context and prevailing character of Whitmore Square, which in 1967 was described in Council Minutes as the Cinderella of Adelaide's squares, neighbouring lower scale development to the Square and Hocking Place and a respectful impact on the adjacent Heritage Places.

The corner allotment is closely to the north of a Local Heritage Place and a State Heritage Place, the remnant wings of which "are naturally complementary. They contribute to the residential scale and character of Whitmore Square, the Salvation Army complex as a whole helping to close southern vistas along the eastern edge of the square." ( Heritage of the City of Adelaide, Corporation of the City of Adelaide, page 196).

I would assert the south east corner of Whitmore Square is very much part of the setting of the State and Local Heritage Places at 70 Whitmore Square and 62-70 Whitmore Square, the northern boundary of which defines the square and is aligned with Hocking Place. The setting of the Heritage Places is very much part of their Heritage Value, as is the rich, pastoral and legal histories of the site.

The eastern edge and south eastern corner is demonstrated on the Troppo Architects streetscape drawing overleaf, contrasted by the perspective drawings provided in the application, which indicate the level of visual interruption that will occur.

The architectural drawings and planning report give an emphasis to a blue glazed brick 4 storey podium, an applied finish to a vertical face that extends as an unbroken plane for its entire height, apart from planter boxes that are placed to Level 04 only. There is some punctuation with unshaded west facing windows and a curious horizontal red thread.

Apart from three upper level balconies to the east and west sides, there is little more than glass blocks, red thread and jointing of concrete panels to distinguish an otherwise blank north wall. The

podium is shown as being taller than the adjacent Heritage Places it faces. The height and fenestration response is somewhat unexplained and probably of greater relevance to the new insertion than the Heritage Places it faces.



Provided by Troppo Architects



DESIGN RESPONSE | HOUSING | 4 HOUSING PLACE ADELAIDE 2004 | 2024

Design Report by tectvs



View Facing North East from Morgan St

DESIGN RESPONSE | HOUSING | 4 HOUSING PLACE ADELAIDE 2004 | 2024

Design Report by tectvs

### Application perspectives

The corner setting is the key to reinforcing the eastern edge of the Square. This should not lead to acceptance of a proposal that imposes itself upon the setting of the adjacent heritage Places; rather it should invite well-mannered contextual design.

The Heritage Places play an important role in defining the low scale residential character of Whitmore Square. This should be respected, maintained and reinforced, not disrupted by a dominant proposal.

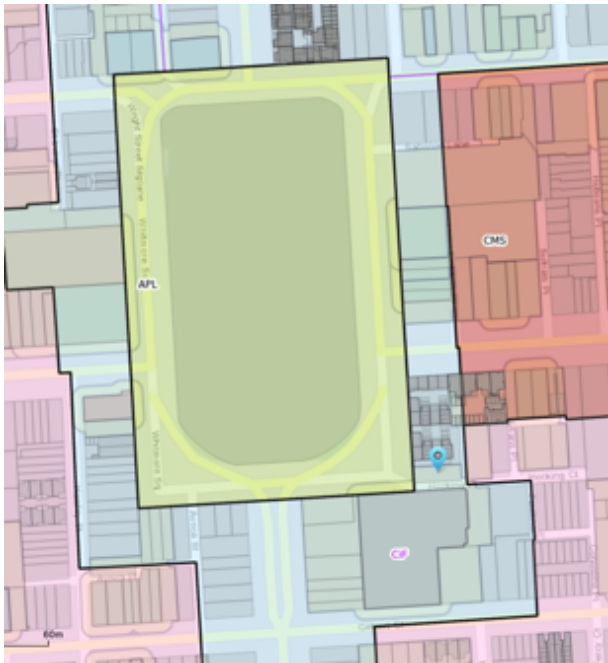
The proposal surprisingly involves contrasting development of a slender, tall building, constructed boundary to boundary, with a blank north wall and a contrasting cladding to a four storey podium.

There will be an impairment of views. The Subject Land occurs at the built form edge to the eastern edge of the Square, disturbing long views of the Heritage Places from the north. The coherence of the eastern and southern edges of the Square will be lost.





SAPPA  
 (Left) Heritage Overlays (Green) Local Heritage Place; yellow is Heritage Adjacency Overlay)



SAPPA Zoning  
 (Right) Note the adjacency to City Living

Having considered the Statement and Architectural Drawings I have arrived at several contrary views to that expressed in the application document.

### Capital City Zone

<p><b>PO 3.1</b></p> <p>A contextual design response that manages differences in scale and building proportions to maintain a cohesive streetscape and frame city streets.</p>	<p><b>DTS/DPF 3.1</b></p> <p>None are applicable</p>
<p>The proposal drawings focus on the podium, which is in the same wall plane on all sides. This applied treatment fails to disguise the significant portion of the building that rises much higher than adjacent buildings, especially the recognised Heritage Places. The lack of articulation of form, the lost opportunity to capitalise on a northern aspect and to continue the important eastern and southern built form edge of Whitmore Square, is not a convincing contextual design response.</p> <p>It is the low rise built form edge to the east and south sides that frame the Square, not the Bohem Apartments as cited in the Planning Report.</p>	

The consistent and cohesive east and south edges will be significantly disrupted by this proposal.	
<p><b>PO 3.2</b> Buildings:</p> <ul style="list-style-type: none"> <li>(a) are designed to reinforce the prevailing datum heights and parapet levels of the street through design elements that provide a clear distinction between levels above and below the prevailing datum line;</li> <li>(b) where located in an existing low-rise context, are designed to include a podium/street wall height and upper level setback that: <ul style="list-style-type: none"> <li>(i) relates to the scale and context of adjoining built form;</li> <li>(ii) provides a human scale at street level;</li> <li>(iii) creates a well-defined and continuity of frontage;</li> <li>(iv) gives emphasis and definition to street corners to clearly define the street grid; and</li> <li>(v) contributes to the interest, vitality and security of the pedestrian environment.</li> </ul> </li> </ul>	<p><b>DTS/DPF 3.2</b> None are applicable</p>
The podium is an unconvincing applied treatment to an otherwise vertical wall that extends beyond the allowable Building Height.	
<p><b>PO 3.3</b> Building façades are strongly modelled, incorporate a vertical composition which reflects the proportions of existing frontages, and ensure that architectural detailing is consistent around corners and along minor streets and laneways.</p>	<p><b>DTS/DPF 3.3</b> None are applicable</p>
The proposal fails to deliver a strongly modelled façade. The land is simply not large enough to successfully deliver such a tall building or yield, within such a cohesive streetscape, demonstrated through the resultant lack of modelling and adverse visual impacts, not only from within the Square, but from the south east and north east.	

<p><b>PO 3.9</b> Development fronting Victoria, Hindmarsh, Whitmore, Hurtle and Light Squares is designed to reinforce the enclosure of the Squares with a continuous built-form with no upper level setbacks.</p>	<p><b>DTS/DPF 3.9</b> None are applicable</p>
<p>The proposal fails to reinforce the continuous built-form edge through the unconvincing applied treatment to create the illusion of a podium and the excessive heights. The proposal has conveniently adopted no upper level setbacks on this small site, resulting in a disruption to the unique low rise character of Whitmore Square.</p>	
<p><b>PO 3.11</b> Development along minor streets and laneways is informed by its local context to maintain the prevailing built form pattern and structure, and designed to provide a sense of enclosure, and enable fine-grain uses at street level to create an intimate, active, inclusive and walkable public realm.</p>	<p><b>DTS/DPF 3.9</b> None are applicable</p>
<p>The proposal appears to be driven by maximising yield and rely upon and be informed by Bohem Apartments, notably outside of the Sub Zone, rather than responding to the prevailing built form pattern established on the east and south sides.</p>	
<p><b>PO 4.1</b> Building height is consistent with the form expressed in any relevant <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> or positively responds to the local context and achieves the desired outcomes of the Zone.</p>	<p><b>DTS/DPF 4.1</b> Development does not exceed the following building heights: Maximum building height is 29m</p>
<p>The building is 60% or 17.3 meters above the allowable building height. The constraints of the small site and unrealistic yield ambition, limit the ability of the Architects to return a credible contextual response to the established built form edges of the Square. The podium treatment is applied, one dimensional and unconvincing.</p>	

<p><b>PO 5.1</b> Development is designed to manage the interface with residential uses in the City Living Zone:</p> <ul style="list-style-type: none"> <li>(a) in relation to building proportions, massing, and overshadowing; and</li> <li>(b) by avoiding land uses, or intensity of land uses, that unduly impact residential amenity (including licensed premises).</li> </ul>	<p><b>DTS/DPF 5.1</b> None are applicable.</p>
<p>The building proportions resulting from the imposition of such a tall building on such a tiny site are unrelated to the established surrounding built form. The required yield represents an unsuitable intensification of land use on an unsuitably small site for this location.</p>	
<p><b>PO 5.2</b> Parts of a development exceed the maximum building height specified in DTS/DPF 4.1 and adjoin the City Living Zone boundaries are designed to minimise negative visual and amenity impacts to residential living areas and outdoor open space.</p>	<p><b>DTS/DPF 5.2</b> Parts of a building above the maximum building height specified in DTS/DPF 4.1 include additional setbacks, avoid tall sheer walls, centrally locate taller elements, and provide variation of light and shadow through articulation.</p>
<p>The size of the site and the proposed yield are at odds, resulting in a building height that is 60% above the allowable building height. The size of the site and the proposed yield preclude meaningful setbacks and articulation.</p>	

## City Frame Subzone

<p><b>PO 2.1</b> Development encourages a uniform streetscape established through a largely consistent front setback. Landscaping and small variations in front setback may occur where they will assist in softening the continuous edge of new built form, reinforce the sense of address and provide a higher amenity streetscape and pedestrian environment which is shaded by street trees and other mature vegetation.</p>	<p><b>DTS/DPF 2.1</b> None are applicable.</p>
<p>The proposal is at odds with the uniform edge to the Square. The podium treatment and design generally is considered hard edge, exacerbated by the sheer vertical faces, some almost blank, that will be highly visible.</p>	

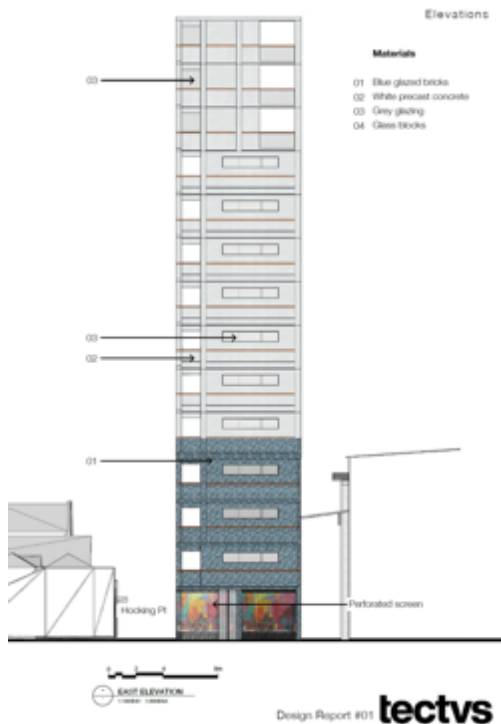
## Heritage Adjacency Overlay

Little or no importance appears to have been placed upon the Desired Outcome and Performance outcome of the Heritage Adjacency Overlay.

DO 1	Development adjacent to State and Local Heritage Places maintains the heritage and cultural values of those Places.
<p>There is an immediate adjacency to:</p> <ul style="list-style-type: none"> <li>• William Booth Home (Local Heritage Place); and</li> <li>• Salvation Army Hostel (former Bushmen's Club) (State Heritage Place)</li> </ul> <p>The Historic Adjacency Overlay around the Subject Land and in this unique small scaled, fine grained south western corner of the city, while not continuous, is sufficiently intertwined through the network of narrow lanes and streets to raise concerns with the imposition of a tall, over height building, the south wall of which is only 4325 from the northern boundary of the Heritage Places and very much a part of the important Whitmore Square setting.</p> <p>The gable wings to the east and west of the William Booth Home are the only remains of the Bushman's Club which commenced in 1870 and demonstrated the importance of pastoralism in South Australia at the time. The William Booth Home was initially listed as a Local Heritage Place (Townscape) signifying the importance of the two storey building to Whitmore Square.</p> <p>There is no doubt the proposed residential flat building encroaches on the setting of the Heritage Places facing the square, and through its proximity across a narrow lane, slender proportions and excessive height, has no sympathy for the proportions and composition and lower scale of the Heritage Places.</p> <p>Given the broad nature of the Heritage Adjacency Overlay, as previously explained, to Whitmore Square, particularly the east, south and west sides, and the network of lanes that connect Sturt Street with Gilbert Street, there can be no hesitation in expressing concern towards the imposition of the proposal, its prominence and contrasting appearance and its diminution of setting and Heritage Value.</p>	

PO 1.1 Development adjacent to a State or Local Heritage Place does not dominate, encroach on or unduly impact on the setting of the Place.	DTS/DPF 1.1 None are applicable.
<p>The East Elevation of the proposal incorporates sparse and contextual information. It is shown overleaf, with the Heritage Places to the south and EcoHousing to the north side. There is an expectation with heritage places, that a proposed infill development sit comfortably with its existing surroundings.</p> <p>The expectation extends to demonstrating an understanding, care and respect of the architectural proportions and qualities, at the very least through accurate drawings. Regrettably this is sadly</p>	

lacking from the proposal, which through its height, sheer vertical faces other than an applied podium technique, lack of separation distance and width of south and north faces, will heavily impose upon the setting of the Heritage Places and the south east corner of Whitmore Square.



## Part 4 - General Development Policies

A brief review of Design in Urban Areas is summarised below:

Outcome	Description	Comment
DO1	(a) contextual - by considering, recognising and carefully responding to its natural surroundings or built environment and positively contributes to the character of the immediate area	Not satisfied; Not contextual Does not positively contribute
PO1.1	Buildings reinforce corners through changes in setback, articulation, materials, colour and massing	Not satisfied Excessive Height No meaningful changes in set back No articulation Contrasting materials to express a podium unsuccessful



PO12.1	Buildings positively contribute to the character of the local area by responding to local context.	Not satisfied The opportunity to develop the key cornerstone to achieve a uniform built edge to Whitmore Square has been lost.
PO 12.3	Buildings are designed to reduce visual mass by breaking up building elevations into distinct elements.	Not satisfied The fine grained nature of the Subject Land and the yield ambition are at odds and have resulted in sheer, relatively unbroken facades.

In conclusion, I am unable to support the development for the following reasons:

- The eastern edge is disrupted in a key location;
- The Heritage Values of the Heritage Places are intertwined with the low scale built form of Whitmore Square;
- The new development will dominate the Heritage Places and diminish their setting and Heritage Values
- The proposal will dominate the surrounding predominantly low scale of the east and south edges of Whitmore Square.

I have some sympathy for the Architects. The yield ambition is totally at odds with the outcomes of the Heritage Adjacency Overlay and Zone, resulting in boundary to boundary development of excessive height, no meaningful articulation, an unsuccessful podium gesture and a wide mostly blank wall to the north.

My opinion is the Planning and Design Code has arrived at its Desired and Performance Outcomes of the Heritage Adjacency Overlay precisely because of the past examples of disparate scale and height of new buildings adjacent heritage listed buildings. The impacts on the Local and State Heritage Place will have immense adverse impact for generations to come and should be mitigated now.

Your sincerely

**Douglas Alexander Architecture and Heritage Pty Ltd**



Douglas Alexander

## Representations

**Representor 70** - Bradley Martin

Name	Bradley Martin
Address	Unit 5 44 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 06:41 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> The area is already blighted by (barely policed) petty crime, homelessness, drug use and other low SES issues. Social Housing will attract an undesirable element to the area.	

## Attached Documents

## Representations

**Representor 71** - Sharon Gerrard

Name	Sharon Gerrard
Address	6A/100 South Terrace ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 07:25 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

Adelaide was once a beautiful, clean, quite and safe city. Skyscrapers, towers, eyesores, blots on the landscape were few and far. You could view the Adelaide Hills from any part. Now the hills are hidden. The air is thick with pollution, traffic is choked. And the parks and gardens are strewn with deterepics and drunks. Whitmore square is home to addicts and deadbeats. Public housing is abused. Views are being replaced by ugly buildings. Excessive lighting has turned night into day. I will always say yes to green gardens, peace and quite; beauty and style. No more overcrowding. No more towers. No more ugly, uninspiring buildings PLEASE!

## Attached Documents

## Representations

**Representor 72** - Simon O'Reilly

Name	Simon O'Reilly
Address	15 Karrayarta Dr, GLENSIDE SA 5065 GLENSIDE SA, 5065 Australia
Submission Date	17/04/2025 08:01 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

### Reasons

My partner and I support increased activity in the CBD and understand a need for more, and affordable housing; however, we strongly oppose the proposed 14-storey development on this site. The limited size of the lot imposes a boundary-to-boundary design that is inappropriate for the area. We live in the South-East corner of Whitmore Square and are very aware of current social and cultural status of the immediate area. Added social/affordable housing at the immediate area is a frightening possibility given the huge issues the area currently faces. The Adelaide Council has been holding focus groups and community meetings to try and address the massive safety concerns the population of Adelaide City CW community has been facing and by adding more affordable housing without addressing problems that remain is a prospect that has not been subject to effective community engagement. Further to this there is already a problem with parking for our friends and family visiting, and the proposed development includes no additional carparks for residents. Serving only to worsen the already bad parking. The notion that those who will be seeking affordable housing do not own, or need cars (or carparks) is nearly offensive and needs reviewing - the traffic report relating to the proposal is near sighted and poorly prepared. Beside these two critical items, there are numerous aspects of the proposed development that directly contravene the Development Act and local area planning requirements that must be answered before any approval. Some of these concerns are: Excessive Height: The proposal exceeds the 9-storey (29m) limit by 50%, violating planning guidelines. Heritage Concerns: It fails to respect the adjacent State Heritage listed building (the former 'Bushmen's Club'), disregarding its form and qualities. Impact on Neighbors (ourselves included): The shadowing and overpowering presence over adjacent affordable eco-housing (limited to 4.5 storeys) and nearby dwellings in Hocking Lane are significant issues. Architectural Integrity: The design lacks appropriate stepping and fails to consider the character, materials, and façade heights of surrounding structures, especially the eco-housing. Sustainability Claims: The proposed building's design features (e.g., a blank north façade, high glare from glazed surfaces) contradict true sustainability ideals, making it less energy-efficient and comfortable. Relevant documents that further outline the above issues, including planning reports and site drawings, or that are being infringed upon, can be provided on request. Some have been attached for your reference in the next section. Thank you. Simon O'Reilly.

## Attached Documents

heritage-overlay-1492967.jpg
Urban-Areas-Overlay-1492968.jpg
Capital-City-Zone-1492969.pdf

# Heritage Adjacency Overlay

## Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	Development adjacent to State and Local Heritage Places maintains the heritage and cultural values of those Places.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Built Form	
PO 1.1  Development adjacent to a State or Local Heritage Place does not dominate, encroach on or unduly impact on the setting of the Place.	DTS/DPF 1.1  None are applicable.

# Design in Urban Areas

## Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	<p>Development is:</p> <ul style="list-style-type: none"><li>(a) contextual – by considering, recognising and carefully responding to its natural surroundings or built environment and positively contributing to the character of the locality</li><li>(b) durable – fit for purpose, adaptable and long lasting</li><li>(c) inclusive – by integrating landscape design to optimise pedestrian and cyclist usability, privacy and equitable access and promoting the provision of quality spaces integrated with the public realm that can be used for access and recreation and help optimise security and safety both internally and within the public realm, for occupants and visitors</li><li>(d) sustainable – by integrating sustainable techniques into the design and siting of development and landscaping to improve community health, urban heat, water management, environmental performance, biodiversity and local amenity and to minimise energy consumption.</li></ul>



## Capital City Zone

### Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	A zone that is the economic and cultural focus of the state supporting a range of residential, employment, community, educational, innovation, recreational, tourism and entertainment facilities generating opportunities for population and employment growth.
DO 2	High intensity and large- scale development with high street walls reinforcing the distinctive grid pattern layout of the city with active non-residential ground level uses to positively contribute to public safety, inclusivity and vibrancy. Design quality of buildings and public spaces is a priority in this zone.

Built form and Character	
PO 3.1 A contextual design response that manages differences in scale and building proportions to maintain a cohesive streetscape and frame city streets.	DTS/DPF 3.1 None are applicable
PO 3.2 Buildings: <ul style="list-style-type: none"><li>1. are designed to reinforce the prevailing datum heights and parapet levels of the street through design elements that provide a clear distinction between levels above and below the prevailing datum line;</li><li>2. where located in an existing low-rise context, are designed to include a podium/street wall height and upper level setback that:<ul style="list-style-type: none"><li>1. relates to the scale and context of adjoining built form;</li><li>2. provides a human scale at street level;</li><li>3. creates a well-defined and continuity of frontage;</li><li>4. gives emphasis and definition to street corners to clearly define the street grid; and</li><li>5. contributes to the interest, vitality and security of the pedestrian environment.</li></ul></li></ul>	DTS/DPF 3.2 None are applicable.
PO 3.3	DTS/DPF 3.3 None are applicable

Building façades are strongly modelled, incorporate a vertical composition which reflects the proportions of existing frontages, and ensure that architectural detailing is consistent around corners and along minor streets and laneways.	
PO 3.4  Development along The Terraces (North, East, South and West) is designed to positively contribute to a continuous built form to frame the Park Lands and city edge.	DTS/DPF 3.4  None are applicable.
PO 3.5  Development along the city's boulevards (as identified in Capital City Zone Table 5.1):  1. built to the street boundary at lower levels to reinforce the City's grid layout and frame the boulevard  2. designed to provide a sense of arrival into the City and strongly define junctions where located on a corner site.	DTS/DPF 3.5  None are applicable.
PO 3.6  Development avoids activities that result in a gap in the built form along a public road or thoroughfare (such as an open lot car park) for an extended period of time to minimise negative impacts on streetscape continuity.	DTS/DPF 3.6  None are applicable.
PO 3.7  Development along the city's boulevards (as identified in Capital City Zone Table 5.1) is designed to maximise views to the Park Lands and not clutter existing view corridors to the Adelaide Hills when viewed from the public realm.	DTS/DPF 3.7  None are applicable.
PO 3.8  Development fronting Victoria, Hindmarsh, Whitmore, Hurtle and Light Squares is designed to provide a comfortable pedestrian and recreation environment by enabling direct sunlight to a majority of the Square.	DTS/DPF 3.8  Development enables direct sunlight to a minimum of 75% of the landscaped part of each Square at the September equinox.
PO 3.9  Development fronting Victoria, Hindmarsh, Whitmore, Hurtle and Light Squares is designed to reinforce the enclosure of the Squares with a continuous built-form with no upper level setbacks.	DTS/DPF 3.9  None are applicable.
PO 3.10  Provision of outdoor eating and drinking facilities associated with cafes and restaurants fronting Victoria, Hindmarsh, Whitmore, Hurtle and Light Squares positively contributes to activity and creates a focus for leisure in the Squares.	DTS/DPF 3.10  None are applicable.

<p>PO 3.11</p> <p>Development along minor streets and laneways is informed by its local context to maintain the prevailing built form pattern and structure, and designed to provide a sense of enclosure, and enable fine-grain uses at street level to create an intimate, active, inclusive and walkable public realm.</p>	<p>DTS/DPF 3.11</p> <p>None are applicable.</p>	
<p>PO 3.12</p> <p>Buildings north of the City Main Street Zone are designed to enable natural sunlight access to the southern footpath of the main street.</p>	<p>DTS/DPF 3.12</p> <p>Buildings north of the City Main Street Zone that cast a shadow on the southern footpath of the main street incorporate narrow and setback tower elements and provide spaces between buildings.</p>	
<p>PO 3.13</p> <p>Buildings are adaptable and flexible to accommodate a range of land uses.</p>	<p>DTS/DPF 3.13</p> <p>The ground floor of buildings has a minimum floor to ceiling height of 3.5m.</p>	
Building Height		
<p>PO 4.1</p> <p>Building height is consistent with the form expressed in any relevant <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> or positively responds to the local context and achieves the desired outcomes of the Zone.</p>	<p>DTS/DPF 4.1</p> <p>Development does not exceed the following building heights:</p>	
	<table><tr><td>Maximum Building Height (Metres)</td></tr></table>	Maximum Building Height (Metres)
	Maximum Building Height (Metres)	
	<table><tr><td>Maximum building height is 29m</td></tr></table>	Maximum building height is 29m
Maximum building height is 29m		
<p>In relation to DTS/DPF 4.1, in instances where:</p> <div><div>1.</div><div>more than one value is returned in the same field, refer to the <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> or <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> in the SA planning database to determine the applicable value relevant to the site of the proposed development</div></div> <div><div>2.</div><div>only one value is returned (i.e. there is one blank field), then the relevant height in metres or building levels applies with no criteria for the other</div></div> <div><div>3.</div><div>no value is returned (i.e. there are blank fields for both maximum building height (metres) and maximum building height (levels), then none are applicable and the relevant development cannot be classified as deemed-to-satisfy.</div></div>		
<p>PO 4.2</p> <p>Development exceeding the building height specified in the <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and the <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> is generally not contemplated unless:</p>	<p>DTS/DPF 4.2</p> <p>None are applicable.</p>	

<p>1. the development provides for the retention, conservation and reuse of a building that:</p> <ul style="list-style-type: none"> <li>1. is a State or local heritage place and the heritage values of the place will be maintained</li> <li>2. provides a notable positive contribution to the character of the local area</li> </ul> <p>or</p> <p>2. the building incorporates measures that provide for a substantial additional gain in sustainability and it demonstrates at least four of the following are met:</p> <ul style="list-style-type: none"> <li>1. the development provides an orderly transition up to an existing taller building or prescribed maximum height in an adjacent Zone or building height area on the <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i></li> <li>2. incorporates high quality open space that is universally accessible and directly connected to, and well integrated with, public realm areas of the street</li> <li>3. Incorporates high quality, safe and secure, universally accessible pedestrian linkages that connect through the development site to the surrounding pedestrian network</li> <li>4. provides higher amenity through provision of private open space in excess of minimum requirements by 25 percent for at least 50 percent of dwellings</li> <li>5. no on site car parking is provided</li> <li>6. at least 75% of the ground floor street fronts of the building are active frontages</li> <li>7. the building has frontage to a public road that abuts the Adelaide Park Lands;</li> <li>8. where the development includes housing, at least 15% of the dwellings are affordable housing</li> <li>9. the impact on adjacent properties is no greater than a building of the maximum height on the <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> in relation to sunlight access and overlooking.</li> </ul>	
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<p>PO 4.3</p> <p>Buildings designed to achieve optimal height and floor space yields.</p>	<p>DTS/DPF 4.3</p> <p>New development has a minimum building height of:</p> <ol style="list-style-type: none"> <li>1. not less than half of the maximum building height specified in DTS/DPF 4.1, or 8 building levels (with a minimum of 28m) in instances where 'No prescribed height limit' is specified in DTS/DPF 4.1; or</li> <li>2. within the City Frame Subzone: 3 building levels (with a minimum of 11.5m), or 4 building levels (with a minimum of 15m) on sites fronting South Terrace</li> </ol> <p>other than where:</p> <ol style="list-style-type: none"> <li>1. a lower building height is necessary to achieve compliance with the Commonwealth Airports (Protection of Airspace) Regulations</li> <li>2. the site of the development adjoins the City Living Zone and a lesser building height is required to positively manage the interface with low-rise residential development</li> <li>3. the site of the development adjoins a heritage place, or contains a heritage place</li> </ol> <p>or</p> <ol style="list-style-type: none"> <li>4. the development includes the construction of a building in the same, or substantially the same, position as a building which was demolished, as a result of significant damage caused by an event within the previous three years where the new building has the same, or substantially the same, layout and external appearance as the previous building.</li> </ol>
Interface	
<p>PO 5.1</p> <p>Development is designed to manage the interface with residential uses in the City Living Zone:</p> <ol style="list-style-type: none"> <li>1. in relation to building proportions, massing, and overshadowing; and</li> <li>2. by avoiding land uses, or intensity of land uses, that unduly impact residential amenity (including licensed premises).</li> </ol>	<p>DTS/DPF 5.1</p> <p>None are applicable.</p>
<p>PO 5.2</p>	<p>DTS/DPF 5.2</p>

Parts of a development exceed the maximum building height specified in DTS/DPF 4.1 and adjoin the City Living Zone boundaries are designed to minimise negative visual and amenity impacts to residential living areas and outdoor open space.	Parts of a building above the maximum building height specified in DTS/DPF 4.1 include additional setbacks, avoid tall sheer walls, centrally locate taller elements, and provide variation of light and shadow through articulation.
Movement	
<p>PO 6.1</p> <p>Access to, and movement within, the Capital City Zone to be universally accessible, easy, safe, comfortable, convenient and legible for people of all abilities, with priority given to pedestrians and cyclists.</p>	<p>DTS/DPF 6.1</p> <p>None are applicable.</p>

#### General provisions

External Appearance	
<p>PO 1.1</p> <p>Buildings reinforce corners through changes in setback, articulation, materials, colour and massing (including height, width, bulk, roof form and slope).</p>	<p>DTS/DPF 1.1</p> <p>None are applicable.</p>
<p>PO 1.2</p> <p>Where zero or minor setbacks are desirable, development provides shelter over footpaths (in the form of verandahs, awnings, canopies and the like, with adequate lighting) to positively contribute to the walkability, comfort and safety of the public realm.</p>	<p>DTS/DPF 1.2</p> <p>None are applicable.</p>
<p>PO 1.3</p> <p>Building elevations facing the primary street (other than ancillary buildings) are designed and detailed to convey purpose, identify main access points and complement the streetscape.</p>	<p>DTS/DPF 1.3</p> <p>None are applicable.</p>
<p>PO 1.4</p> <p>Plant, exhaust and intake vents and other technical equipment are integrated into the building design to minimise visibility from the public realm and negative impacts on residential amenity by:</p> <ol style="list-style-type: none"> <li>1. positioning plant and equipment discretely, in unobtrusive locations as viewed from public roads and spaces</li> </ol>	<p>DTS/DPF 1.4</p> <p>Development does not incorporate any structures that protrude beyond the roofline.</p>



<p>2. screening rooftop plant and equipment from view</p> <p>3. when located on the roof of non-residential development, locating the plant and equipment as far as practicable from adjacent sensitive land uses.</p>	
<p>PO 1.5</p> <p>The negative visual impact of outdoor storage, waste management, loading and service areas is minimised by integrating them into the building design and screening them from public view (such as fencing, landscaping and built form), taking into account the form of development contemplated in the relevant zone.</p>	<p>DTS/DPF 1.5</p> <p>None are applicable.</p>

## Landscaping

<p>PO 3.1</p> <p>Soft landscaping and tree planting are incorporated to:</p> <ol style="list-style-type: none"> <li>1. minimise heat absorption and reflection</li> <li>2. maximise shade and shelter</li> <li>3. maximise stormwater infiltration</li> <li>4. enhance the appearance of land and streetscapes.</li> </ol>	<p>DTS/DPF 3.1</p> <p>None are applicable.</p>
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## Environmental Performance

<p>PO 4.1</p> <p>Buildings are sited, oriented and designed to maximise natural sunlight access and ventilation to main activity areas, habitable rooms, common areas and open spaces.</p>	<p>DTS/DPF 4.1</p> <p>None are applicable.</p>
<p>PO 4.2</p> <p>Buildings are sited and designed to maximise passive environmental performance and minimise energy consumption and reliance on mechanical systems, such as heating and cooling.</p>	<p>DTS/DPF 4.2</p> <p>None are applicable.</p>
<p>PO 4.3</p> <p>Buildings incorporate climate responsive techniques and features such as building and window orientation, use of eaves, verandahs and shading structures, water harvesting, at ground landscaping, green walls, green roofs and photovoltaic cells.</p>	<p>DTS/DPF 4.3</p> <p>None are applicable.</p>

## Water Sensitive Design

<p>PO 5.1</p>	<p>DTS/DPF 5.1</p>
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Development is sited and designed to maintain natural hydrological systems without negatively impacting: <ul style="list-style-type: none"> <li>1. the quantity and quality of surface water and groundwater</li> <li>2. the depth and directional flow of surface water and groundwater</li> <li>3. the quality and function of natural springs.</li> </ul>	None are applicable.
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#### On-site Waste Treatment Systems

PO 6.1  Dedicated on-site effluent disposal areas do not include any areas to be used for, or could be reasonably foreseen to be used for, private open space, driveways or car parking.	DTS/DPF 6.1  Effluent disposal drainage areas do not: <ul style="list-style-type: none"> <li>1. encroach within an area used as private open space or result in less private open space than that specified in Design in Urban Areas Table 1 - Private Open Space</li> <li>2. use an area also used as a driveway</li> <li>3. encroach within an area used for on-site car parking or result in less on-site car parking than that specified in Transport, Access and Parking Table 1 - General Off-Street Car Parking Requirements or Table 2 - Off-Street Car Parking Requirements in Designated Areas.</li> </ul>
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#### Overlooking / Visual Privacy (low rise buildings)

PO 10.1  Development mitigates direct overlooking from upper level windows to habitable rooms and private open spaces of adjoining residential uses in neighbourhood-type zones.	DTS/DPF 10.1  Upper level windows facing side or rear boundaries shared with a residential use in a neighbourhood-type zone: <ul style="list-style-type: none"> <li>1. are permanently obscured to a height of 1.5m above finished floor level and are fixed or not capable of being opened more than 125mm</li> <li>2. have sill heights greater than or equal to 1.5m above finished floor level</li> <li>3. incorporate screening with a maximum of 25% openings, permanently fixed no more than 500mm from the window surface and sited adjacent to any part of the window less than 1.5 m above the finished floor level.</li> </ul>
PO 10.2  Development mitigates direct overlooking from balconies to habitable rooms and private open space of adjoining residential uses in neighbourhood type zones.	DTS/DPF 10.2  One of the following is satisfied:

	<p>1. the longest side of the balcony or terrace will face a public road, public road reserve or public reserve that is at least 15m wide in all places faced by the balcony or terrace</p> <p>or</p> <p>2. all sides of balconies or terraces on upper building levels are permanently obscured by screening with a maximum 25% transparency/openings fixed to a minimum height of:</p> <p>1. 1.5m above finished floor level where the balcony is located at least 15 metres from the nearest habitable window of a dwelling on adjacent land</p> <p>or</p> <p>2. 1.7m above finished floor level in all other cases</p>
Site Facilities / Waste Storage (excluding low rise residential development)	
<p>PO 11.1</p> <p>Development provides a dedicated area for on-site collection and sorting of recyclable materials and refuse, green organic waste and wash bay facilities for the ongoing maintenance of bins that is adequate in size considering the number and nature of the activities they will serve and the frequency of collection.</p>	<p>DTS/DPF 11.1</p> <p>None are applicable.</p>
<p>PO 11.2</p> <p>Communal waste storage and collection areas are located, enclosed and designed to be screened from view from the public domain, open space and dwellings.</p>	<p>DTS/DPF 11.2</p> <p>None are applicable.</p>
<p>PO 11.3</p> <p>Communal waste storage and collection areas are designed to be well ventilated and located away from habitable rooms.</p>	<p>DTS/DPF 11.3</p> <p>None are applicable.</p>
<p>PO 11.4</p> <p>Communal waste storage and collection areas are designed to allow waste and recycling collection vehicles to enter and leave the site without reversing.</p>	<p>DTS/DPF 11.4</p> <p>None are applicable.</p>
<p>PO 11.5</p> <p>For mixed use developments, non-residential waste and recycling storage areas and access provide opportunities for on-site management of food waste through composting or other waste recovery as appropriate.</p>	<p>DTS/DPF 11.5</p> <p>None are applicable.</p>
All Development - Medium and High Rise	

External Appearance	
<p>PO 12.1</p> <p>Buildings positively contribute to the character of the local area by responding to local context.</p>	<p>DTS/DPF 12.1</p> <p>None are applicable.</p>
<p>PO 12.2</p> <p>Architectural detail at street level and a mixture of materials at lower building levels near the public interface are provided to reinforce a human scale.</p>	<p>DTS/DPF 12.2</p> <p>None are applicable.</p>
<p>PO 12.3</p> <p>Buildings are designed to reduce visual mass by breaking up building elevations into distinct elements.</p>	<p>DTS/DPF 12.3</p> <p>None are applicable.</p>
<p>PO 12.4</p> <p>Boundary walls visible from public land include visually interesting treatments to break up large blank elevations.</p>	<p>DTS/DPF 12.4</p> <p>None are applicable.</p>
<p>PO 12.5</p> <p>External materials and finishes are durable and age well to minimise ongoing maintenance requirements.</p>	<p>DTS/DPF 12.5</p> <p>Buildings utilise a combination of the following external materials and finishes:</p> <ol style="list-style-type: none"> <li>1. masonry</li> <li>2. natural stone</li> <li>3. pre-finished materials that minimise staining, discolouring or deterioration.</li> </ol>
<p>PO 12.6</p> <p>Street-facing building elevations are designed to provide attractive, high quality and pedestrian-friendly street frontages.</p>	<p>DTS/DPF 12.6</p> <p>Building street frontages incorporate:</p> <ol style="list-style-type: none"> <li>1. active uses such as shops or offices</li> <li>2. prominent entry areas for multi-storey buildings (where it is a common entry)</li> <li>3. habitable rooms of dwellings</li> <li>4. areas of communal public realm with public art or the like, where consistent with the zone and/or subzone provisions.</li> </ol>
<p>PO 12.7</p> <p>Entrances to multi-storey buildings are safe, attractive, welcoming, functional and contribute to streetscape character.</p>	<p>DTS/DPF 12.7</p> <p>Entrances to multi-storey buildings are:</p> <ol style="list-style-type: none"> <li>1. oriented towards the street</li> <li>2. clearly visible and easily identifiable from the street and vehicle parking areas</li> </ol>

	<div>3. designed to be prominent, accentuated and a welcoming feature if there are no active or occupied ground floor uses</div> <div>4. designed to provide shelter, a sense of personal address and transitional space around the entry</div> <div>5. located as close as practicable to the lift and / or lobby access to minimise the need for long access corridors</div> <div>6. designed to avoid the creation of potential areas of entrapment.</div>																																				
PO 12.8	DTS/DPF 12.8																																				
Building services, plant and mechanical equipment are screened from the public realm.	None are applicable.																																				
Landscaping																																					
PO 13.1	DTS/DPF 13.1																																				
Development facing a street provides a well landscaped area that contains a deep soil space to accommodate a tree of a species and size adequate to provide shade, contribute to tree canopy targets and soften the appearance of buildings.	Buildings provide a 4m by 4m deep soil space in front of the building that accommodates a medium to large tree, except where no building setback from front property boundaries is desired.																																				
PO 13.2	<div>DTS/DPF 13.2</div> <div>Multi-storey development provides deep soil zones and incorporates trees at not less than the following rates, except in a location or zone where full site coverage is desired.</div> <table><tr><th>Site area</th><th>Minimum deep soil area</th><th>Minimum dimension</th><th>Tree / deep soil zones</th></tr><tr><td>&lt;300 m²</td><td>10 m²</td><td>1.5m</td><td>1 small tree / 10 m²</td></tr><tr><td>300-1500 m²</td><td>7% site area</td><td>3m</td><td>1 medium tree / 30 m²</td></tr><tr><td>&gt;1500 m²</td><td>7% site area</td><td>6m</td><td>1 large or medium tree / 60 m²</td></tr><tr><td colspan="4">Tree size and site area definitions</td></tr><tr><td>Small tree</td><td colspan="3">4-6m mature height and 2-4m canopy spread</td></tr><tr><td>Medium tree</td><td colspan="3">6-12m mature height and 4-8m canopy spread</td></tr><tr><td>Large tree</td><td colspan="3">12m mature height and &gt;8m canopy spread</td></tr><tr><td>Site area</td><td colspan="3">The total area for development site, not average area per dwelling</td></tr></table>	Site area	Minimum deep soil area	Minimum dimension	Tree / deep soil zones	<300 m²	10 m²	1.5m	1 small tree / 10 m²	300-1500 m²	7% site area	3m	1 medium tree / 30 m²	>1500 m²	7% site area	6m	1 large or medium tree / 60 m²	Tree size and site area definitions				Small tree	4-6m mature height and 2-4m canopy spread			Medium tree	6-12m mature height and 4-8m canopy spread			Large tree	12m mature height and >8m canopy spread			Site area	The total area for development site, not average area per dwelling		
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PO 13.3 Deep soil zones with access to natural light are provided to assist in maintaining vegetation health.	DTS/DPF 13.3 None are applicable.
PO 13.4 Unless separated by a public road or reserve, development sites adjacent to any zone that has a primary purpose of accommodating low-rise residential development incorporate a deep soil zone along the common boundary to enable medium to large trees to be retained or established to assist in screening new buildings of 3 or more building levels in height.	DTS/DPF 13.4 Building elements of 3 or more building levels in height are set back at least 6m from a zone boundary in which a deep soil zone area is incorporated.
Environmental	
PO 14.1 Development minimises detrimental micro-climatic impacts on adjacent land and buildings.	DTS/DPF 14.1 None are applicable.
PO 14.2 Development incorporates sustainable design techniques and features such as window orientation, eaves and shading structures, water harvesting and use, green walls and roof designs that enable the provision of rain water tanks (where they are not provided elsewhere on site), green roofs and photovoltaic cells.	DTS/DPF 14.2 None are applicable.
PO 14.3 Development of 5 or more building levels, or 21m or more in height (as measured from natural ground level and excluding roof-mounted mechanical plant and equipment) is designed to minimise the impacts of wind through measures such as:  <ol style="list-style-type: none"> <li>1. a podium at the base of a tall tower and aligned with the street to deflect wind away from the street</li> <li>2. substantial verandahs around a building to deflect downward travelling wind flows over pedestrian areas</li> <li>3. the placement of buildings and use of setbacks to deflect the wind at ground level</li> <li>4. avoiding tall shear elevations that create windy conditions at street level.</li> </ol>	DTS/DPF 14.3 None are
Overlooking/Visual Privacy	
PO 16.1	DTS/DPF 16.1



Development mitigates direct overlooking of habitable rooms and private open spaces of adjacent residential uses in neighbourhood-type zones through measures such as: <ul style="list-style-type: none"> <li>1. appropriate site layout and building orientation</li> <li>2. off-setting the location of balconies and windows of habitable rooms or areas with those of other buildings so that views are oblique rather than direct to avoid direct line of sight</li> <li>3. building setbacks from boundaries (including building boundary to boundary where appropriate) that interrupt views or that provide a spatial separation between balconies or windows of habitable rooms</li> <li>4. screening devices that are integrated into the building design and have minimal negative effect on residents' or neighbours' amenity.</li> </ul>	None are applicable.
All residential development	
Front elevations and passive surveillance	
PO 17.1 Dwellings incorporate windows facing primary street frontages to encourage passive surveillance and make a positive contribution to the streetscape.	DTS/DPF 17.1 Each dwelling with a frontage to a public street: <ul style="list-style-type: none"> <li>1. includes at least one window facing the primary street from a habitable room that has a minimum internal room dimension of 2.4m</li> <li>2. has an aggregate window area of at least 2m<sup>2</sup> facing the primary street.</li> </ul>
PO 17.2 Dwellings incorporate entry doors within street frontages to address the street and provide a legible entry point for visitors.	DTS/DPF 17.2 Dwellings with a frontage to a public street have an entry door visible from the primary street boundary.
Outlook and Amenity	
PO 18.1 Living rooms have an external outlook to provide a high standard of amenity for occupants.	DTS/DPF 18.1 A living room of a dwelling incorporates a window with an external outlook of the street frontage, private open space, public open space, or waterfront areas.
PO 18.2 Bedrooms are separated or shielded from active communal recreation areas, common access areas and vehicle parking areas and access ways to mitigate noise and artificial light intrusion.	DTS/DPF 18.2 None are applicable.

Outlook and Visual Privacy	
<p>PO 26.1</p> <p>Ground level dwellings have a satisfactory short range visual outlook to public, communal or private open space.</p>	<p>DTS/DPF 26.1</p> <p>Buildings:</p> <ol style="list-style-type: none"> <li>1. provide a habitable room at ground or first level with a window facing toward the street</li> <li>2. limit the height / extent of solid walls or fences facing the street to 1.2m high above the footpath level or, where higher, to 50% of the site frontage.</li> </ol>
<p>PO 26.2</p> <p>The visual privacy of ground level dwellings within multi-level buildings is protected.</p>	<p>DTS/DPF 26.2</p> <p>The finished floor level of ground level dwellings in multi-storey developments is raised by up to 1.2m.</p>
Private Open Space	
<p>PO 27.1</p> <p>Dwellings are provided with suitable sized areas of usable private open space to meet the needs of occupants.</p>	<p>DTS/DPF 27.1</p> <p>Private open space provided in accordance with Design in Urban Areas Table 1 - Private Open Space.</p>
Residential amenity in multi-level buildings	
<p>PO 28.1</p> <p>Residential accommodation within multi-level buildings have habitable rooms, windows and balconies designed and positioned to be separated from those of other dwellings and accommodation to provide visual and acoustic privacy and allow for natural ventilation and the infiltration of daylight into interior and outdoor spaces.</p>	<p>DTS/DPF 28.1</p> <p>Habitable rooms and balconies of independent dwellings and accommodation are separated by at least 6m from one another where there is a direct line of sight between them and 3m or more from a side or rear property boundary.</p>
<p>PO 28.2</p> <p>Balconies are designed, positioned and integrated into the overall architectural form and detail of the development to:</p> <ol style="list-style-type: none"> <li>1. respond to daylight, wind, and acoustic conditions to maximise comfort and provide visual privacy</li> <li>2. allow views and casual surveillance of the street while providing for safety and visual privacy of nearby living spaces and private outdoor areas.</li> </ol>	<p>DTS/DPF 28.2</p> <p>Balconies utilise one or a combination of the following design elements:</p> <ol style="list-style-type: none"> <li>1. sun screens</li> <li>2. pergolas</li> <li>3. louvres</li> <li>4. green facades</li> <li>5. openable walls.</li> </ol>
<p>PO 28.3</p> <p>Balconies are of sufficient size and depth to accommodate outdoor seating and promote indoor / outdoor living.</p>	<p>DTS/DPF 28.3</p> <p>Balconies open directly from a habitable room and incorporate a minimum dimension of 2m.</p>

<p>PO 28.4</p> <p>Dwellings are provided with sufficient space for storage to meet likely occupant needs.</p>	<p>DTS/DPF 28.4</p> <p>Dwellings (not including student accommodation or serviced apartments) are provided with storage at the following rates with at least 50% or more of the storage volume to be provided within the dwelling:</p> <ol style="list-style-type: none"> <li>1. studio: not less than 6m<sup>3</sup></li> <li>2. 1 bedroom dwelling / apartment: not less than 8m<sup>3</sup></li> <li>3. 2 bedroom dwelling / apartment: not less than 10m<sup>3</sup></li> <li>4. 3+ bedroom dwelling / apartment: not less than 12m<sup>3</sup>.</li> </ol>
<p>PO 28.5</p> <p>Dwellings that use light wells for access to daylight, outlook and ventilation for habitable rooms, are designed to ensure a reasonable living amenity is provided.</p>	<p>DTS/DPF 28.5</p> <p>Light wells:</p> <ol style="list-style-type: none"> <li>1. are not used as the primary source of outlook for living rooms</li> <li>2. up to 18m in height have a minimum horizontal dimension of 3m, or 6m if overlooked by bedrooms</li> <li>3. above 18m in height have a minimum horizontal dimension of 6m, or 9m if overlooked by bedrooms.</li> </ol>
<p>PO 28.6</p> <p>Attached or abutting dwellings are designed to minimise the transmission of sound between dwellings and, in particular, to protect bedrooms from possible noise intrusions.</p>	<p>DTS/DPF 28.6</p> <p>None are applicable.</p>
<p>PO 28.7</p> <p>Dwellings are designed so that internal structural columns correspond with the position of internal walls to ensure that the space within the dwelling/apartment is useable.</p>	<p>DTS/DPF 28.7</p> <p>None are applicable.</p>
Dwelling Configuration	
<p>PO 29.1</p> <p>Buildings containing in excess of 10 dwellings provide a variety of dwelling sizes and a range in the number of bedrooms per dwelling to contribute to housing diversity.</p>	<p>DTS/DPF 29.1</p> <p>Buildings containing in excess of 10 dwellings provide at least one of each of the following:</p> <ol style="list-style-type: none"> <li>1. studio (where there is no separate bedroom)</li> <li>2. 1 bedroom dwelling / apartment with a floor area of at least 50m<sup>2</sup></li> <li>3. 2 bedroom dwelling / apartment with a floor area of at least 65m<sup>2</sup></li> </ol>

	4. 3+ bedroom dwelling / apartment with a floor area of at least 80m <sup>2</sup> , and any dwelling over 3 bedrooms provides an additional 15m <sup>2</sup> for every additional bedroom.
PO 29.2  Dwellings located on the ground floor of multi-level buildings with 3 or more bedrooms have the windows of their habitable rooms overlooking internal courtyard space or other public space, where possible.	DTS/DPF 29.2  None are applicable.
Common Areas	
PO 30.1  The size of lifts, lobbies and corridors is sufficient to accommodate movement of bicycles, strollers, mobility aids and visitor waiting areas.	DTS/DPF 30.1  Common corridor or circulation areas: <ul style="list-style-type: none"> <li>1. have a minimum ceiling height of 2.7m</li> <li>2. provide access to no more than 8 dwellings</li> <li>3. incorporate a wider section at apartment entries where the corridors exceed 12m in length from a core.</li> </ul>

# Representations

Representor 73 - Hannah Graney

Name	Hannah Graney
Address	19/50 Whitmore Square ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 08:03 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

**Reasons**

My partner and I support increased activity in the CBD and understand a need for more, and affordable housing; however, we strongly oppose the proposed 14-storey development on this site. The limited size of the lot imposes a boundary-to-boundary design that is inappropriate for the area. Our key concerns include:

Excessive Height: The proposal exceeds the 9-storey (29m) limit by 50%, violating planning guidelines. Heritage Concerns: It fails to respect the adjacent State Heritage listed building (the former 'Bushmen's Club'), disregarding its form and qualities. Impact on Neighbors (ourselves included): The shadowing and overpowering presence over adjacent affordable eco-housing (limited to 4.5 storeys) and nearby dwellings in Hocking Lane are significant issues. Architectural Integrity: The design lacks appropriate stepping and fails to consider the character, materials, and façade heights of surrounding structures, especially the eco-housing. Sustainability Claims: The proposed building's design features (e.g., a blank north façade, high glare from glazed surfaces) contradict true sustainability ideals, making it less energy-efficient and comfortable. Existing Carparking for Family & Visitors: 36 new dwellings with 45 new bicycle parks, and no car parks, being provided for residents and their visitors is unrealistic, offensive, and does not meet Deem to Satisfy requirements and needs be reviewed accordingly. City South-West Community Safety: Adelaide City Council along with other organisations relating, (i.e. DASA, MAPS, SAPOL), have been holding community meetings and focus groups to try ad address persisting safety and crime issues that have been at excessive and uncontrolled levels since mid-2024. Until these issues can be addressed, the proposed development poses a greater risk to the residents of the immediate area. Relevant documents that further outline the above issues, including planning reports and site drawings, or those that are being infringed upon, can be provided on request with some attached in the next section. Thank you. Hannah Graney.

## Attached Documents

Capital-City-Zone2-1492971.pdf
heritage-overlay2-1492972.jpg
Uban-Areas-Overlay2-1492973.jpg

## Capital City Zone

### Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	A zone that is the economic and cultural focus of the state supporting a range of residential, employment, community, educational, innovation, recreational, tourism and entertainment facilities generating opportunities for population and employment growth.
DO 2	High intensity and large- scale development with high street walls reinforcing the distinctive grid pattern layout of the city with active non-residential ground level uses to positively contribute to public safety, inclusivity and vibrancy. Design quality of buildings and public spaces is a priority in this zone.

Built form and Character	
PO 3.1 A contextual design response that manages differences in scale and building proportions to maintain a cohesive streetscape and frame city streets.	DTS/DPF 3.1 None are applicable
PO 3.2 Buildings: <ul style="list-style-type: none"><li>1. are designed to reinforce the prevailing datum heights and parapet levels of the street through design elements that provide a clear distinction between levels above and below the prevailing datum line;</li><li>2. where located in an existing low-rise context, are designed to include a podium/street wall height and upper level setback that:<ul style="list-style-type: none"><li>1. relates to the scale and context of adjoining built form;</li><li>2. provides a human scale at street level;</li><li>3. creates a well-defined and continuity of frontage;</li><li>4. gives emphasis and definition to street corners to clearly define the street grid; and</li><li>5. contributes to the interest, vitality and security of the pedestrian environment.</li></ul></li></ul>	DTS/DPF 3.2 None are applicable.
PO 3.3	DTS/DPF 3.3 None are applicable



Building façades are strongly modelled, incorporate a vertical composition which reflects the proportions of existing frontages, and ensure that architectural detailing is consistent around corners and along minor streets and laneways.	
PO 3.4  Development along The Terraces (North, East, South and West) is designed to positively contribute to a continuous built form to frame the Park Lands and city edge.	DTS/DPF 3.4  None are applicable.
PO 3.5  Development along the city's boulevards (as identified in Capital City Zone Table 5.1):  1. built to the street boundary at lower levels to reinforce the City's grid layout and frame the boulevard  2. designed to provide a sense of arrival into the City and strongly define junctions where located on a corner site.	DTS/DPF 3.5  None are applicable.
PO 3.6  Development avoids activities that result in a gap in the built form along a public road or thoroughfare (such as an open lot car park) for an extended period of time to minimise negative impacts on streetscape continuity.	DTS/DPF 3.6  None are applicable.
PO 3.7  Development along the city's boulevards (as identified in Capital City Zone Table 5.1) is designed to maximise views to the Park Lands and not clutter existing view corridors to the Adelaide Hills when viewed from the public realm.	DTS/DPF 3.7  None are applicable.
PO 3.8  Development fronting Victoria, Hindmarsh, Whitmore, Hurtle and Light Squares is designed to provide a comfortable pedestrian and recreation environment by enabling direct sunlight to a majority of the Square.	DTS/DPF 3.8  Development enables direct sunlight to a minimum of 75% of the landscaped part of each Square at the September equinox.
PO 3.9  Development fronting Victoria, Hindmarsh, Whitmore, Hurtle and Light Squares is designed to reinforce the enclosure of the Squares with a continuous built-form with no upper level setbacks.	DTS/DPF 3.9  None are applicable.
PO 3.10  Provision of outdoor eating and drinking facilities associated with cafes and restaurants fronting Victoria, Hindmarsh, Whitmore, Hurtle and Light Squares positively contributes to activity and creates a focus for leisure in the Squares.	DTS/DPF 3.10  None are applicable.

<p>PO 3.11</p> <p>Development along minor streets and laneways is informed by its local context to maintain the prevailing built form pattern and structure, and designed to provide a sense of enclosure, and enable fine-grain uses at street level to create an intimate, active, inclusive and walkable public realm.</p>	<p>DTS/DPF 3.11</p> <p>None are applicable.</p>	
<p>PO 3.12</p> <p>Buildings north of the City Main Street Zone are designed to enable natural sunlight access to the southern footpath of the main street.</p>	<p>DTS/DPF 3.12</p> <p>Buildings north of the City Main Street Zone that cast a shadow on the southern footpath of the main street incorporate narrow and setback tower elements and provide spaces between buildings.</p>	
<p>PO 3.13</p> <p>Buildings are adaptable and flexible to accommodate a range of land uses.</p>	<p>DTS/DPF 3.13</p> <p>The ground floor of buildings has a minimum floor to ceiling height of 3.5m.</p>	
Building Height		
<p>PO 4.1</p> <p>Building height is consistent with the form expressed in any relevant <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> or positively responds to the local context and achieves the desired outcomes of the Zone.</p>	<p>DTS/DPF 4.1</p> <p>Development does not exceed the following building heights:</p>	
	<table><tr><td>Maximum Building Height (Metres)</td></tr></table>	Maximum Building Height (Metres)
	Maximum Building Height (Metres)	
	<table><tr><td>Maximum building height is 29m</td></tr></table>	Maximum building height is 29m
Maximum building height is 29m		
<p>In relation to DTS/DPF 4.1, in instances where:</p> <div><div>1.</div><div>more than one value is returned in the same field, refer to the <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> or <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> in the SA planning database to determine the applicable value relevant to the site of the proposed development</div></div> <div><div>2.</div><div>only one value is returned (i.e. there is one blank field), then the relevant height in metres or building levels applies with no criteria for the other</div></div> <div><div>3.</div><div>no value is returned (i.e. there are blank fields for both maximum building height (metres) and maximum building height (levels), then none are applicable and the relevant development cannot be classified as deemed-to-satisfy.</div></div>		
<p>PO 4.2</p> <p>Development exceeding the building height specified in the <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and the <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> is generally not contemplated unless:</p>	<p>DTS/DPF 4.2</p> <p>None are applicable.</p>	

<p>1. the development provides for the retention, conservation and reuse of a building that:</p> <ul style="list-style-type: none"> <li>1. is a State or local heritage place and the heritage values of the place will be maintained</li> <li>2. provides a notable positive contribution to the character of the local area</li> </ul> <p>or</p> <p>2. the building incorporates measures that provide for a substantial additional gain in sustainability and it demonstrates at least four of the following are met:</p> <ul style="list-style-type: none"> <li>1. the development provides an orderly transition up to an existing taller building or prescribed maximum height in an adjacent Zone or building height area on the <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i></li> <li>2. incorporates high quality open space that is universally accessible and directly connected to, and well integrated with, public realm areas of the street</li> <li>3. Incorporates high quality, safe and secure, universally accessible pedestrian linkages that connect through the development site to the surrounding pedestrian network</li> <li>4. provides higher amenity through provision of private open space in excess of minimum requirements by 25 percent for at least 50 percent of dwellings</li> <li>5. no on site car parking is provided</li> <li>6. at least 75% of the ground floor street fronts of the building are active frontages</li> <li>7. the building has frontage to a public road that abuts the Adelaide Park Lands;</li> <li>8. where the development includes housing, at least 15% of the dwellings are affordable housing</li> <li>9. the impact on adjacent properties is no greater than a building of the maximum height on the <i>Maximum Building Height (Levels) Technical and Numeric Variation layer</i> and <i>Maximum Building Height (Metres) Technical and Numeric Variation layer</i> in relation to sunlight access and overlooking.</li> </ul>	
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<p>PO 4.3</p> <p>Buildings designed to achieve optimal height and floor space yields.</p>	<p>DTS/DPF 4.3</p> <p>New development has a minimum building height of:</p> <ol style="list-style-type: none"> <li>1. not less than half of the maximum building height specified in DTS/DPF 4.1, or 8 building levels (with a minimum of 28m) in instances where 'No prescribed height limit' is specified in DTS/DPF 4.1; or</li> <li>2. within the City Frame Subzone: 3 building levels (with a minimum of 11.5m), or 4 building levels (with a minimum of 15m) on sites fronting South Terrace</li> </ol> <p>other than where:</p> <ol style="list-style-type: none"> <li>1. a lower building height is necessary to achieve compliance with the Commonwealth Airports (Protection of Airspace) Regulations</li> <li>2. the site of the development adjoins the City Living Zone and a lesser building height is required to positively manage the interface with low-rise residential development</li> <li>3. the site of the development adjoins a heritage place, or contains a heritage place</li> </ol> <p>or</p> <ol style="list-style-type: none"> <li>4. the development includes the construction of a building in the same, or substantially the same, position as a building which was demolished, as a result of significant damage caused by an event within the previous three years where the new building has the same, or substantially the same, layout and external appearance as the previous building.</li> </ol>
Interface	
<p>PO 5.1</p> <p>Development is designed to manage the interface with residential uses in the City Living Zone:</p> <ol style="list-style-type: none"> <li>1. in relation to building proportions, massing, and overshadowing; and</li> <li>2. by avoiding land uses, or intensity of land uses, that unduly impact residential amenity (including licensed premises).</li> </ol>	<p>DTS/DPF 5.1</p> <p>None are applicable.</p>
<p>PO 5.2</p>	<p>DTS/DPF 5.2</p>

Parts of a development exceed the maximum building height specified in DTS/DPF 4.1 and adjoin the City Living Zone boundaries are designed to minimise negative visual and amenity impacts to residential living areas and outdoor open space.	Parts of a building above the maximum building height specified in DTS/DPF 4.1 include additional setbacks, avoid tall sheer walls, centrally locate taller elements, and provide variation of light and shadow through articulation.
Movement	
<p>PO 6.1</p> <p>Access to, and movement within, the Capital City Zone to be universally accessible, easy, safe, comfortable, convenient and legible for people of all abilities, with priority given to pedestrians and cyclists.</p>	<p>DTS/DPF 6.1</p> <p>None are applicable.</p>

#### General provisions

External Appearance	
<p>PO 1.1</p> <p>Buildings reinforce corners through changes in setback, articulation, materials, colour and massing (including height, width, bulk, roof form and slope).</p>	<p>DTS/DPF 1.1</p> <p>None are applicable.</p>
<p>PO 1.2</p> <p>Where zero or minor setbacks are desirable, development provides shelter over footpaths (in the form of verandahs, awnings, canopies and the like, with adequate lighting) to positively contribute to the walkability, comfort and safety of the public realm.</p>	<p>DTS/DPF 1.2</p> <p>None are applicable.</p>
<p>PO 1.3</p> <p>Building elevations facing the primary street (other than ancillary buildings) are designed and detailed to convey purpose, identify main access points and complement the streetscape.</p>	<p>DTS/DPF 1.3</p> <p>None are applicable.</p>
<p>PO 1.4</p> <p>Plant, exhaust and intake vents and other technical equipment are integrated into the building design to minimise visibility from the public realm and negative impacts on residential amenity by:</p> <ol style="list-style-type: none"> <li>1. positioning plant and equipment discretely, in unobtrusive locations as viewed from public roads and spaces</li> </ol>	<p>DTS/DPF 1.4</p> <p>Development does not incorporate any structures that protrude beyond the roofline.</p>

2. screening rooftop plant and equipment from view  3. when located on the roof of non-residential development, locating the plant and equipment as far as practicable from adjacent sensitive land uses.	
PO 1.5  The negative visual impact of outdoor storage, waste management, loading and service areas is minimised by integrating them into the building design and screening them from public view (such as fencing, landscaping and built form), taking into account the form of development contemplated in the relevant zone.	DTS/DPF 1.5  None are applicable.

## Landscaping

PO 3.1  Soft landscaping and tree planting are incorporated to: <ol style="list-style-type: none"> <li>1. minimise heat absorption and reflection</li> <li>2. maximise shade and shelter</li> <li>3. maximise stormwater infiltration</li> <li>4. enhance the appearance of land and streetscapes.</li> </ol>	DTS/DPF 3.1  None are applicable.
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## Environmental Performance

PO 4.1  Buildings are sited, oriented and designed to maximise natural sunlight access and ventilation to main activity areas, habitable rooms, common areas and open spaces.	DTS/DPF 4.1  None are applicable.
PO 4.2  Buildings are sited and designed to maximise passive environmental performance and minimise energy consumption and reliance on mechanical systems, such as heating and cooling.	DTS/DPF 4.2  None are applicable.
PO 4.3  Buildings incorporate climate responsive techniques and features such as building and window orientation, use of eaves, verandahs and shading structures, water harvesting, at ground landscaping, green walls, green roofs and photovoltaic cells.	DTS/DPF 4.3  None are applicable.

## Water Sensitive Design

PO 5.1	DTS/DPF 5.1
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Development is sited and designed to maintain natural hydrological systems without negatively impacting: <ul style="list-style-type: none"> <li>1. the quantity and quality of surface water and groundwater</li> <li>2. the depth and directional flow of surface water and groundwater</li> <li>3. the quality and function of natural springs.</li> </ul>	None are applicable.
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#### On-site Waste Treatment Systems

PO 6.1  Dedicated on-site effluent disposal areas do not include any areas to be used for, or could be reasonably foreseen to be used for, private open space, driveways or car parking.	DTS/DPF 6.1  Effluent disposal drainage areas do not: <ul style="list-style-type: none"> <li>1. encroach within an area used as private open space or result in less private open space than that specified in Design in Urban Areas Table 1 - Private Open Space</li> <li>2. use an area also used as a driveway</li> <li>3. encroach within an area used for on-site car parking or result in less on-site car parking than that specified in Transport, Access and Parking Table 1 - General Off-Street Car Parking Requirements or Table 2 - Off-Street Car Parking Requirements in Designated Areas.</li> </ul>
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#### Overlooking / Visual Privacy (low rise buildings)

PO 10.1  Development mitigates direct overlooking from upper level windows to habitable rooms and private open spaces of adjoining residential uses in neighbourhood-type zones.	DTS/DPF 10.1  Upper level windows facing side or rear boundaries shared with a residential use in a neighbourhood-type zone: <ul style="list-style-type: none"> <li>1. are permanently obscured to a height of 1.5m above finished floor level and are fixed or not capable of being opened more than 125mm</li> <li>2. have sill heights greater than or equal to 1.5m above finished floor level</li> <li>3. incorporate screening with a maximum of 25% openings, permanently fixed no more than 500mm from the window surface and sited adjacent to any part of the window less than 1.5 m above the finished floor level.</li> </ul>
PO 10.2  Development mitigates direct overlooking from balconies to habitable rooms and private open space of adjoining residential uses in neighbourhood type zones.	DTS/DPF 10.2  One of the following is satisfied:

	<p>1. the longest side of the balcony or terrace will face a public road, public road reserve or public reserve that is at least 15m wide in all places faced by the balcony or terrace</p> <p>or</p> <p>2. all sides of balconies or terraces on upper building levels are permanently obscured by screening with a maximum 25% transparency/openings fixed to a minimum height of:</p> <p>1. 1.5m above finished floor level where the balcony is located at least 15 metres from the nearest habitable window of a dwelling on adjacent land</p> <p>or</p> <p>2. 1.7m above finished floor level in all other cases</p>
Site Facilities / Waste Storage (excluding low rise residential development)	
<p>PO 11.1</p> <p>Development provides a dedicated area for on-site collection and sorting of recyclable materials and refuse, green organic waste and wash bay facilities for the ongoing maintenance of bins that is adequate in size considering the number and nature of the activities they will serve and the frequency of collection.</p>	<p>DTS/DPF 11.1</p> <p>None are applicable.</p>
<p>PO 11.2</p> <p>Communal waste storage and collection areas are located, enclosed and designed to be screened from view from the public domain, open space and dwellings.</p>	<p>DTS/DPF 11.2</p> <p>None are applicable.</p>
<p>PO 11.3</p> <p>Communal waste storage and collection areas are designed to be well ventilated and located away from habitable rooms.</p>	<p>DTS/DPF 11.3</p> <p>None are applicable.</p>
<p>PO 11.4</p> <p>Communal waste storage and collection areas are designed to allow waste and recycling collection vehicles to enter and leave the site without reversing.</p>	<p>DTS/DPF 11.4</p> <p>None are applicable.</p>
<p>PO 11.5</p> <p>For mixed use developments, non-residential waste and recycling storage areas and access provide opportunities for on-site management of food waste through composting or other waste recovery as appropriate.</p>	<p>DTS/DPF 11.5</p> <p>None are applicable.</p>
All Development - Medium and High Rise	

External Appearance	
<p>PO 12.1</p> <p>Buildings positively contribute to the character of the local area by responding to local context.</p>	<p>DTS/DPF 12.1</p> <p>None are applicable.</p>
<p>PO 12.2</p> <p>Architectural detail at street level and a mixture of materials at lower building levels near the public interface are provided to reinforce a human scale.</p>	<p>DTS/DPF 12.2</p> <p>None are applicable.</p>
<p>PO 12.3</p> <p>Buildings are designed to reduce visual mass by breaking up building elevations into distinct elements.</p>	<p>DTS/DPF 12.3</p> <p>None are applicable.</p>
<p>PO 12.4</p> <p>Boundary walls visible from public land include visually interesting treatments to break up large blank elevations.</p>	<p>DTS/DPF 12.4</p> <p>None are applicable.</p>
<p>PO 12.5</p> <p>External materials and finishes are durable and age well to minimise ongoing maintenance requirements.</p>	<p>DTS/DPF 12.5</p> <p>Buildings utilise a combination of the following external materials and finishes:</p> <ol style="list-style-type: none"> <li>1. masonry</li> <li>2. natural stone</li> <li>3. pre-finished materials that minimise staining, discolouring or deterioration.</li> </ol>
<p>PO 12.6</p> <p>Street-facing building elevations are designed to provide attractive, high quality and pedestrian-friendly street frontages.</p>	<p>DTS/DPF 12.6</p> <p>Building street frontages incorporate:</p> <ol style="list-style-type: none"> <li>1. active uses such as shops or offices</li> <li>2. prominent entry areas for multi-storey buildings (where it is a common entry)</li> <li>3. habitable rooms of dwellings</li> <li>4. areas of communal public realm with public art or the like, where consistent with the zone and/or subzone provisions.</li> </ol>
<p>PO 12.7</p> <p>Entrances to multi-storey buildings are safe, attractive, welcoming, functional and contribute to streetscape character.</p>	<p>DTS/DPF 12.7</p> <p>Entrances to multi-storey buildings are:</p> <ol style="list-style-type: none"> <li>1. oriented towards the street</li> <li>2. clearly visible and easily identifiable from the street and vehicle parking areas</li> </ol>

	<div>3. designed to be prominent, accentuated and a welcoming feature if there are no active or occupied ground floor uses</div> <div>4. designed to provide shelter, a sense of personal address and transitional space around the entry</div> <div>5. located as close as practicable to the lift and / or lobby access to minimise the need for long access corridors</div> <div>6. designed to avoid the creation of potential areas of entrapment.</div>																																				
PO 12.8	DTS/DPF 12.8																																				
Building services, plant and mechanical equipment are screened from the public realm.	None are applicable.																																				
Landscaping																																					
PO 13.1	DTS/DPF 13.1																																				
Development facing a street provides a well landscaped area that contains a deep soil space to accommodate a tree of a species and size adequate to provide shade, contribute to tree canopy targets and soften the appearance of buildings.	Buildings provide a 4m by 4m deep soil space in front of the building that accommodates a medium to large tree, except where no building setback from front property boundaries is desired.																																				
PO 13.2	<div>DTS/DPF 13.2</div> <div>Multi-storey development provides deep soil zones and incorporates trees at not less than the following rates, except in a location or zone where full site coverage is desired.</div> <table><tr><th>Site area</th><th>Minimum deep soil area</th><th>Minimum dimension</th><th>Tree / deep soil zones</th></tr><tr><td>&lt;300 m²</td><td>10 m²</td><td>1.5m</td><td>1 small tree / 10 m²</td></tr><tr><td>300-1500 m²</td><td>7% site area</td><td>3m</td><td>1 medium tree / 30 m²</td></tr><tr><td>&gt;1500 m²</td><td>7% site area</td><td>6m</td><td>1 large or medium tree / 60 m²</td></tr><tr><td colspan="4">Tree size and site area definitions</td></tr><tr><td>Small tree</td><td colspan="3">4-6m mature height and 2-4m canopy spread</td></tr><tr><td>Medium tree</td><td colspan="3">6-12m mature height and 4-8m canopy spread</td></tr><tr><td>Large tree</td><td colspan="3">12m mature height and &gt;8m canopy spread</td></tr><tr><td>Site area</td><td colspan="3">The total area for development site, not average area per dwelling</td></tr></table>	Site area	Minimum deep soil area	Minimum dimension	Tree / deep soil zones	<300 m²	10 m²	1.5m	1 small tree / 10 m²	300-1500 m²	7% site area	3m	1 medium tree / 30 m²	>1500 m²	7% site area	6m	1 large or medium tree / 60 m²	Tree size and site area definitions				Small tree	4-6m mature height and 2-4m canopy spread			Medium tree	6-12m mature height and 4-8m canopy spread			Large tree	12m mature height and >8m canopy spread			Site area	The total area for development site, not average area per dwelling		
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PO 13.3 Deep soil zones with access to natural light are provided to assist in maintaining vegetation health.	DTS/DPF 13.3 None are applicable.
PO 13.4 Unless separated by a public road or reserve, development sites adjacent to any zone that has a primary purpose of accommodating low-rise residential development incorporate a deep soil zone along the common boundary to enable medium to large trees to be retained or established to assist in screening new buildings of 3 or more building levels in height.	DTS/DPF 13.4 Building elements of 3 or more building levels in height are set back at least 6m from a zone boundary in which a deep soil zone area is incorporated.
Environmental	
PO 14.1 Development minimises detrimental micro-climatic impacts on adjacent land and buildings.	DTS/DPF 14.1 None are applicable.
PO 14.2 Development incorporates sustainable design techniques and features such as window orientation, eaves and shading structures, water harvesting and use, green walls and roof designs that enable the provision of rain water tanks (where they are not provided elsewhere on site), green roofs and photovoltaic cells.	DTS/DPF 14.2 None are applicable.
PO 14.3 Development of 5 or more building levels, or 21m or more in height (as measured from natural ground level and excluding roof-mounted mechanical plant and equipment) is designed to minimise the impacts of wind through measures such as:  <ol style="list-style-type: none"> <li>1. a podium at the base of a tall tower and aligned with the street to deflect wind away from the street</li> <li>2. substantial verandahs around a building to deflect downward travelling wind flows over pedestrian areas</li> <li>3. the placement of buildings and use of setbacks to deflect the wind at ground level</li> <li>4. avoiding tall shear elevations that create windy conditions at street level.</li> </ol>	DTS/DPF 14.3 None are
Overlooking/Visual Privacy	
PO 16.1	DTS/DPF 16.1

Development mitigates direct overlooking of habitable rooms and private open spaces of adjacent residential uses in neighbourhood-type zones through measures such as: <ul style="list-style-type: none"> <li>1. appropriate site layout and building orientation</li> <li>2. off-setting the location of balconies and windows of habitable rooms or areas with those of other buildings so that views are oblique rather than direct to avoid direct line of sight</li> <li>3. building setbacks from boundaries (including building boundary to boundary where appropriate) that interrupt views or that provide a spatial separation between balconies or windows of habitable rooms</li> <li>4. screening devices that are integrated into the building design and have minimal negative effect on residents' or neighbours' amenity.</li> </ul>	None are applicable.
All residential development	
Front elevations and passive surveillance	
PO 17.1 Dwellings incorporate windows facing primary street frontages to encourage passive surveillance and make a positive contribution to the streetscape.	DTS/DPF 17.1 Each dwelling with a frontage to a public street: <ul style="list-style-type: none"> <li>1. includes at least one window facing the primary street from a habitable room that has a minimum internal room dimension of 2.4m</li> <li>2. has an aggregate window area of at least 2m<sup>2</sup> facing the primary street.</li> </ul>
PO 17.2 Dwellings incorporate entry doors within street frontages to address the street and provide a legible entry point for visitors.	DTS/DPF 17.2 Dwellings with a frontage to a public street have an entry door visible from the primary street boundary.
Outlook and Amenity	
PO 18.1 Living rooms have an external outlook to provide a high standard of amenity for occupants.	DTS/DPF 18.1 A living room of a dwelling incorporates a window with an external outlook of the street frontage, private open space, public open space, or waterfront areas.
PO 18.2 Bedrooms are separated or shielded from active communal recreation areas, common access areas and vehicle parking areas and access ways to mitigate noise and artificial light intrusion.	DTS/DPF 18.2 None are applicable.



Outlook and Visual Privacy	
<p>PO 26.1</p> <p>Ground level dwellings have a satisfactory short range visual outlook to public, communal or private open space.</p>	<p>DTS/DPF 26.1</p> <p>Buildings:</p> <ol style="list-style-type: none"> <li>1. provide a habitable room at ground or first level with a window facing toward the street</li> <li>2. limit the height / extent of solid walls or fences facing the street to 1.2m high above the footpath level or, where higher, to 50% of the site frontage.</li> </ol>
<p>PO 26.2</p> <p>The visual privacy of ground level dwellings within multi-level buildings is protected.</p>	<p>DTS/DPF 26.2</p> <p>The finished floor level of ground level dwellings in multi-storey developments is raised by up to 1.2m.</p>
Private Open Space	
<p>PO 27.1</p> <p>Dwellings are provided with suitable sized areas of usable private open space to meet the needs of occupants.</p>	<p>DTS/DPF 27.1</p> <p>Private open space provided in accordance with Design in Urban Areas Table 1 - Private Open Space.</p>
Residential amenity in multi-level buildings	
<p>PO 28.1</p> <p>Residential accommodation within multi-level buildings have habitable rooms, windows and balconies designed and positioned to be separated from those of other dwellings and accommodation to provide visual and acoustic privacy and allow for natural ventilation and the infiltration of daylight into interior and outdoor spaces.</p>	<p>DTS/DPF 28.1</p> <p>Habitable rooms and balconies of independent dwellings and accommodation are separated by at least 6m from one another where there is a direct line of sight between them and 3m or more from a side or rear property boundary.</p>
<p>PO 28.2</p> <p>Balconies are designed, positioned and integrated into the overall architectural form and detail of the development to:</p> <ol style="list-style-type: none"> <li>1. respond to daylight, wind, and acoustic conditions to maximise comfort and provide visual privacy</li> <li>2. allow views and casual surveillance of the street while providing for safety and visual privacy of nearby living spaces and private outdoor areas.</li> </ol>	<p>DTS/DPF 28.2</p> <p>Balconies utilise one or a combination of the following design elements:</p> <ol style="list-style-type: none"> <li>1. sun screens</li> <li>2. pergolas</li> <li>3. louvres</li> <li>4. green facades</li> <li>5. openable walls.</li> </ol>
<p>PO 28.3</p> <p>Balconies are of sufficient size and depth to accommodate outdoor seating and promote indoor / outdoor living.</p>	<p>DTS/DPF 28.3</p> <p>Balconies open directly from a habitable room and incorporate a minimum dimension of 2m.</p>

<p>PO 28.4</p> <p>Dwellings are provided with sufficient space for storage to meet likely occupant needs.</p>	<p>DTS/DPF 28.4</p> <p>Dwellings (not including student accommodation or serviced apartments) are provided with storage at the following rates with at least 50% or more of the storage volume to be provided within the dwelling:</p> <ol style="list-style-type: none"> <li>1. studio: not less than 6m<sup>3</sup></li> <li>2. 1 bedroom dwelling / apartment: not less than 8m<sup>3</sup></li> <li>3. 2 bedroom dwelling / apartment: not less than 10m<sup>3</sup></li> <li>4. 3+ bedroom dwelling / apartment: not less than 12m<sup>3</sup>.</li> </ol>
<p>PO 28.5</p> <p>Dwellings that use light wells for access to daylight, outlook and ventilation for habitable rooms, are designed to ensure a reasonable living amenity is provided.</p>	<p>DTS/DPF 28.5</p> <p>Light wells:</p> <ol style="list-style-type: none"> <li>1. are not used as the primary source of outlook for living rooms</li> <li>2. up to 18m in height have a minimum horizontal dimension of 3m, or 6m if overlooked by bedrooms</li> <li>3. above 18m in height have a minimum horizontal dimension of 6m, or 9m if overlooked by bedrooms.</li> </ol>
<p>PO 28.6</p> <p>Attached or abutting dwellings are designed to minimise the transmission of sound between dwellings and, in particular, to protect bedrooms from possible noise intrusions.</p>	<p>DTS/DPF 28.6</p> <p>None are applicable.</p>
<p>PO 28.7</p> <p>Dwellings are designed so that internal structural columns correspond with the position of internal walls to ensure that the space within the dwelling/apartment is useable.</p>	<p>DTS/DPF 28.7</p> <p>None are applicable.</p>
Dwelling Configuration	
<p>PO 29.1</p> <p>Buildings containing in excess of 10 dwellings provide a variety of dwelling sizes and a range in the number of bedrooms per dwelling to contribute to housing diversity.</p>	<p>DTS/DPF 29.1</p> <p>Buildings containing in excess of 10 dwellings provide at least one of each of the following:</p> <ol style="list-style-type: none"> <li>1. studio (where there is no separate bedroom)</li> <li>2. 1 bedroom dwelling / apartment with a floor area of at least 50m<sup>2</sup></li> <li>3. 2 bedroom dwelling / apartment with a floor area of at least 65m<sup>2</sup></li> </ol>

	4. 3+ bedroom dwelling / apartment with a floor area of at least 80m <sup>2</sup> , and any dwelling over 3 bedrooms provides an additional 15m <sup>2</sup> for every additional bedroom.
PO 29.2  Dwellings located on the ground floor of multi-level buildings with 3 or more bedrooms have the windows of their habitable rooms overlooking internal courtyard space or other public space, where possible.	DTS/DPF 29.2  None are applicable.
Common Areas	
PO 30.1  The size of lifts, lobbies and corridors is sufficient to accommodate movement of bicycles, strollers, mobility aids and visitor waiting areas.	DTS/DPF 30.1  Common corridor or circulation areas: <ol style="list-style-type: none"> <li>1. have a minimum ceiling height of 2.7m</li> <li>2. provide access to no more than 8 dwellings</li> <li>3. incorporate a wider section at apartment entries where the corridors exceed 12m in length from a core.</li> </ol>

# Heritage Adjacency Overlay

## Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	Development adjacent to State and Local Heritage Places maintains the heritage and cultural values of those Places.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Built Form	
PO 1.1  Development adjacent to a State or Local Heritage Place does not dominate, encroach on or unduly impact on the setting of the Place.	DTS/DPF 1.1  None are applicable.

# Design in Urban Areas

## Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	<p>Development is:</p> <ul style="list-style-type: none"><li>(a) contextual – by considering, recognising and carefully responding to its natural surroundings or built environment and positively contributing to the character of the locality</li><li>(b) durable – fit for purpose, adaptable and long lasting</li><li>(c) inclusive – by integrating landscape design to optimise pedestrian and cyclist usability, privacy and equitable access and promoting the provision of quality spaces integrated with the public realm that can be used for access and recreation and help optimise security and safety both internally and within the public realm, for occupants and visitors</li><li>(d) sustainable – by integrating sustainable techniques into the design and siting of development and landscaping to improve community health, urban heat, water management, environmental performance, biodiversity and local amenity and to minimise energy consumption.</li></ul>

## Representations

**Representor 74** - Carmel O'Reilly

Name	Carmel O'Reilly
Address	15 Karrayarta Drive, GLENSIDE SA 5065 GLENSIDE SA, 5065 Australia
Submission Date	17/04/2025 08:28 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

We strongly oppose the proposed development at 8 Hocking Place, Adelaide. The summary of our concerns are:

- Strongly oppose the proposed 14-storey development in the CBD despite supporting increased activity and affordable housing.
- Excessive Height: Exceeds the 9-storey (29m) limit by 50%, violating planning guidelines.
- Heritage Concerns: Disregards the adjacent State Heritage listed building (former 'Bushmen's Club'), undermining its historic significance.
- Impact on Neighbours: Causes significant overshadowing and overbearing presence over nearby affordable eco-housing and Hocking Lane dwellings, including our own.
- Architectural Integrity: Lacks necessary architectural stepping; fails to respect the character and materials of surrounding structures.
- Sustainability Claims: Design features (blank north façade, glaring surfaces) contradict true sustainability, making it energy-inefficient and uncomfortable.
- Car Parking Issues: Unreasonable to have 36 new dwellings with no car parks; this does not meet Deem to Satisfy requirements.
- Community Safety Concerns: Ongoing safety and crime issues in the city, calling into question the viability of adding more residents until these are addressed.

Thank you for taking these concerns and we trust you will take them onboard as when fully considered the development should not be approved in it's current form. Documents can be made available on request that support the above concerns. Thank you.

## Attached Documents



# Representations

**Representor 75** - Libby O'Reilly

Name	Libby O'Reilly
Address	6/7 Moorea Crt WEST LAKES SA, 5020 Australia
Submission Date	17/04/2025 08:29 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

**Reasons**  
I strongly oppose the proposed development at 8 Hocking Place, Adelaide. The summary of my concerns are: ? Strongly oppose the proposed 14-storey development in the CBD despite supporting increased activity and affordable housing. ? Excessive Height: Exceeds the 9-storey (29m) limit by 50%, violating planning guidelines. ? Heritage Concerns: Disregards the adjacent State Heritage listed building (former 'Bushmen's Club'), undermining its historic significance. ? Impact on Neighbours: Causes significant overshadowing and overbearing presence over nearby affordable eco-housing and Hocking Lane dwellings, including our own. ? Architectural Integrity: Lacks necessary architectural stepping; fails to respect the character and materials of surrounding structures. ? Sustainability Claims: Design features (blank north façade, glaring surfaces) contradict true sustainability, making it energy-inefficient and uncomfortable. ? Car Parking Issues: Unreasonable to have 36 new dwellings with no car parks; this does not meet Deem to Satisfy requirements. ? Community Safety Concerns: Ongoing safety and crime issues in the city, calling into question the viability of adding more residents until these are addressed. Thank you for taking these concerns and I trust you will take them onboard as when fully considered the development should not be approved in it's current form. Thank you.

## Attached Documents

## Representations

**Representor 76** - Andrew Boorman

Name	Andrew Boorman
Address	38 Leicester Street PARKSIDE SA, 5063 Australia
Submission Date	17/04/2025 09:25 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

### Reasons

I strongly oppose the proposed development at 8 Hocking Place, Adelaide. I support increased numbers of residents and the provision of affordable housing in the CBD but I strongly oppose the proposed 14-storey development on a number of grounds. • Excessive Height: Exceeds the 9-storey (29m) limit by 50%, violating planning guidelines. • Heritage Concerns: Its size, form and character is completely out of context with the adjacent State Heritage listed building (former 'Bushmen's Club'), undermining its historic significance. • Impact on Neighbours: The proposed building will significantly overshadow and have an overbearing presence on nearby affordable eco-housing and Hocking Lane dwellings. Also note my Community Safety Concerns below. • Architectural Integrity: The proposed development does not in any way integrate with the form or character of existing buildings in Whitmore Square in particular with those on the Eastern side and in the South Eastern corner. The "Troppo" building (in which my daughter and her partner have bought their first home) is an appropriate development that enhances the character and amenity of Whitmore Square. • Sustainability Claims: The proposed development makes no use of a northern orientation to bring light and winter warmth into its residences. Ignoring such basic sustainable design principles and instead relying on technological fixes is completely unsatisfactory. • Car Parking: This is claimed as a sustainability feature, yet the development provides only 6 internal bicycle parks and a further 6 outside. While I totally support increased provision of safe cycle ways in Adelaide I suggest this development will simply lead to more competition for the limited long term on street parking around and near the square. • Community Safety Concerns: There is existing social housing around Hocking Place. There are already issues with drunkenness, drug overdosing and anti-social behaviour particularly in the SE corner of Whitmore Square. This area will become a ghetto of residents and others with complex social needs that are not currently being appropriately addressed. Thank you for considering my submission.

## Attached Documents

## Representations

**Representor 77** - Annie Hastwell

Name	Annie Hastwell
Address	42 whitmore square ADELAIDE SA, 5000 Australia
Submission Date	17/04/2025 10:27 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

### Reasons

I represent SWAG - the South West Activation Group - residents of Whitmore Square and surrounding streets looking to enhance the surroundings and activities in this part of Adelaide. While we support change and development around Whitmore Square we strongly oppose this current proposal on the grounds that it takes no account of and pays no respect to its surroundings- at 14 storeys it is much too high. Its claimed sustainability features do not stack up. Its other claim of being intended as 'social' or 'affordable' housing is unsubstantiated by any details or mention of operator, and in the circumstances highly unlikely to be the eventual outcome should the developers get this through. Whitmore Square is an excitingly diverse part of Adelaide with a lovely heritage texture, ripe for graceful development and deserves better than this clumsy proposal.

## Attached Documents

# Representations

**Representor 78** - Padma Roy

Name	Padma Roy
Address	UNIT 4 28 RUSSELL STREET ADELAIDE SA, 5000 Australia
Submission Date	22/04/2025 09:47 AM
Submission Source	Email
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
<b>Reasons</b> See attachment	

## Attached Documents

Representation-on-application-version-33-10960736.docx
Representation-Roys-10960737.pdf

## Lewis, Tegan (DHUD)

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**From:** mpnf@optusnet.com.au  
**Sent:** Thursday, 17 April 2025 5:25 PM  
**To:** DHUD:SPC Reps  
**Subject:** Representation Application about Whitmore Square High Rise Building Development  
**Attachments:** Representation-on-Application-Version-3 (3).docx

You don't often get email from mpnf@optusnet.com.au. [Learn why this is important](#)

To Whom It May Concern,

Please excuse this first time application for its unfamiliarity with the process and the application.

Submission Date: 17.4.2025

Thank you

Regards

Mrs. P. Roy and Ms. S Roy

Adelaide Residents

## REPRESENTATION ON APPLICATION

*Planning, Development and Infrastructure Act 2016*

<b>Applicant:</b>	Click here to enter text. <i>[applicant name]</i>
<b>Development Number:</b>	24042402 <i>[development application number]</i>
<b>Nature of Development:</b>	Click here to enter text. <i>[development description of performance assessed elements or aspects of outline consent application]</i>
<b>Zone/Sub-zone/Overlay:</b>	Click here to enter text. <i>[zone/sub-zone/overlay of subject land]</i>
<b>Subject Land:</b>	8 Hocking Place Adelaide 5000 <i>[street number, street name, suburb, postcode]</i> <i>[lot number, plan number, certificate of title number, volume &amp; folio]</i>
<b>Contact Officer:</b>	Click here to enter text. <i>[relevant authority name]</i>
<b>Phone Number:</b>	Click here to enter text. <i>[authority phone]</i>
<b>Close Date:</b>	17 <sup>th</sup> April 2025 <i>[closing date for submissions]</i>

My name: Philippa Callaghan	My phone number: 0432601653
My postal address*: 13 Whitmore Square, Adelaide 5000	My email: philippac4@gmail.com

\* Indicates mandatory information

My position is:	<input type="checkbox"/> I support the development <input type="checkbox"/> I support the development with some concerns (detail below) <input checked="" type="checkbox"/> I oppose the development
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## REPRESENTATION ON APPLICATION

*Planning, Development and Infrastructure Act 2016*

<b>Applicant:</b>	Mrs. Padma Roy and Ms.Shoma Roy <i>[applicant name]</i>
<b>Development Number:</b>	24042402
<b>Nature of Development:</b>	Residential 14 storey tower building
<b>Zone/Sub-zone/Overlay:</b>	F182817AL355
<b>Subject Land:</b>	8, Hocking Place, Adelaide SA 5000 [CT 6052/749 ]
<b>Contact Officer:</b>	Assessment Panel/Assessment Manager at SA Planning Commission <i>[relevant authority name]</i>
<b>Phone Number:</b>	1800752664 <i>[authority phone]</i>
<b>Close Date:</b>	17.4.2025 at.11.59pm <i>[closing date for submissions]</i>

My name*: Mrs.Padma Roy and Ms.Shoma Roy	My phone number: 08 82121669
My postal address*: Unit 4/28 Russell St, Adelaide SA 5000	My email: mpnf@optusnet.com.au

\* Indicates mandatory information

My position is:

☐ I support the development

☐ I support the development with some concerns (detail below)

☒ I oppose the development

The specific reasons I believe that consent should be refused are:

*Adelaide is considered at least one of the top ten liveable cities in the world according to The Economists Global Liveable Cities rising from 30<sup>th</sup> to 11<sup>th</sup> [2021-2024]. Much of this has to do with air pollution, traffic pollution, traffic infrastructure, governance infrastructure, parks, housing availability and affordability.*

*Objections are that constructing a 14 storey tower building will impact on many of these features that enhance the appeal and quality of life in inner city living due to:*

*significant increase in urban density; less living spaces*

*impact on traffic infrastructure around Whitmore Square rendering congested traffic conditions;*

*difficulty of repairs and maintenance of high rise buildings;*

*high rise buildings are less desirable for elderly, people with physical disability and families with children; there can be psycho-social impacts on high rise living: higher prevalence of mental health issues ( Evans et al, 2003;Gifford 2007)*

*disconnection and less social cohesion with community ( Chile et al 2014;Ghazali et al 2014)*

*perceived loss of neighbourhood character and increased isolation are strongly associated with urban living ( Corcoran & Marshall 2017)*

*Such a high rise building proposal does not guarantee housing affordability.*

*Further, there are adequate student housing provided by various universities for student accommodation that are available in the cbd e.g. Unilodge.*



**Government of South Australia**

Department for Trade  
and Investment

*[attach additional pages as needed]*

Note: In order for this submission to be valid, it must:

- be in writing; and
- include the name and address of the person (or persons) who are making the representation; and
- set out the particular reasons why consent should be granted or refused; and
- comment only on the performance-based elements (or aspects) of the proposal, which does not include the:
  - [Click here to enter text.](#) *[list any accepted or deemed-to-satisfy elements of the development].*

I:	<input type="checkbox"/> wish to be heard in support of my submission*
	<input checked="" type="checkbox"/> do not wish to be heard in support of my submission
By:	<input type="checkbox"/> appearing personally
	<input type="checkbox"/> being represented by the following person:

*\*You may be contacted if you indicate that you wish to be heard by the relevant authority in support of your submission*

Signature: Shoma Roy

Date: 17.4.2025

Return Address: Unit 4/28 Russell St, Adelaide SA 5000 *[relevant authority postal address]* or

Email: [mpnf@optusnet.com.au](mailto:mpnf@optusnet.com.au) *[relevant authority email address]* or

Complete online submission: [plan.sa.gov.au/have\\_your\\_say/notified\\_developments](http://plan.sa.gov.au/have_your_say/notified_developments)

The specific reasons I believe that consent should be refused are:

1. This 14 storey apartment block proposed for 8 Hocking Place, Adelaide would go over the height limit of 6 storeys. Please look after one of our beautiful Adelaide squares (Whitmore Square) by considering the streetscape and do not allow this development to go over 6 storeys.
2. The proposed plan talks about squeezing 50 to 80 residents into the corner of the square, in between the Sobering Up Unit and the eco apartments (with Café Troppo on the corner). This seems unfair to the eco apartment residents. A smaller development would be better for them.
3. (In the flyer, stuck on the door of 8 Hocking Place.) The developers describe their building as 'containing 36 dwellings, all of which are to be offered as affordable housing (social housing).' When they say 'affordable housing (social housing)', what do they mean by this?
4. Due to the current price and shortage of housing, there is a need for both affordable and social housing for people on low incomes. So more affordable housing in the city would be a good thing.
5. However, if this is intended as social housing for vulnerable people, then this is a terrible location for it. There are already serious social problems (with excessive drinking and drug taking) in the square. Adding more vulnerable residents would compound the problem to the next level and would be disastrous.
6. I am writing as a houseowner, ratepayer and resident of Whitmore Square. My husband has lived here for twenty years. I have lived here for three years. I am writing from the viewpoint of someone who loves and cares about the square. (I support the rights of homeless and Aboriginal people to meet and socialise in the square but am saddened by the excessive drinking and drug taking that happens.)

*[attach additional pages as needed]*

Note: In order for this submission to be valid, it must:

- be in writing; and
- include the name and address of the person (or persons) who are making the representation; and
- set out the particular reasons why consent should be granted or refused; and
- comment only on the performance-based elements (or aspects) of the proposal, which does not include the:
  - [Click here to enter text.](#) *[list any accepted or deemed-to-satisfy elements of the development]*.

I: ☐ wish to be heard in support of my submission\*  
☒ do not wish to be heard in support of my submission

By: ☐ appearing personally  
☐ being represented by the following person: [Click here to enter text.](#)

*\*You may be contacted if you indicate that you wish to be heard by the relevant authority in support of your submission*

Signature: Philippa Callaghan

Date: 17<sup>th</sup> April 2025

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Return Address: [Click here to enter text.](#) *[relevant authority postal address]* or

Email: [Click here to enter text.](#) *[relevant authority email address]* or

Complete online submission: [plan.sa.gov.au/have\\_your\\_say/notified\\_developments](https://plan.sa.gov.au/have_your_say/notified_developments)