

June 9, 2026

Jo Reid
 Senior Planning Officer
 Commission Assessment
 Department for Housing and Urban Development

Via: The PlanSA Portal

Dear Jo,

DA 26000407 | 260 FRANKLIN STREET, ADELAIDE

Thank you for your correspondence dated 26 May 2026 in which you provided responses from the Government Architect and the City of Adelaide on the amended proposal and our response to the RFI.

In response to the commentary, we provide amended Architectural Drawings prepared by PACT in **Appendix 1**, which include an updated ground floor plan.

We also provide the following written response. For clarity, we have copied the commentary and provided our response below.

Government Architect

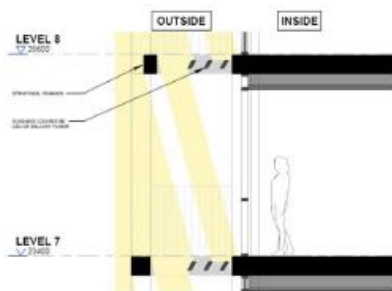
I consider further resolution remains warranted in relation to:

- *integrated external solar shading, particularly to east and west facing glazing and balcony edges*

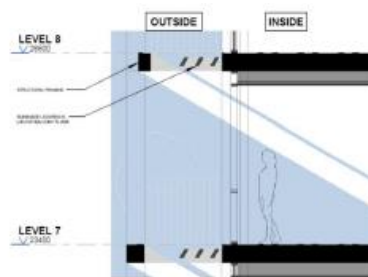
The Applicant maintains their original response to this comment, as follows:

Additional strategies have been implemented to shade the northern and western facades (plan and section pages). Where balconies are not provided on the northern side (centre) horizontal shading louvres are provided.

The number and angle of members is designed such that winter sun is not excluded. A similar strategy is utilised on the eastern and western facades where fixed shading devices are provided above windows where balconies are not present. Sunshades have separation gaps to allow abseil window cleaning access.



Section - Sunshading Northern Facade - Jan 21 - 11-11pm 75°
 SECTIONS - SHADING scale 1 : 50



Section - Sunshading Northern Facade - Jun 21 - 11-11pm 35°
 SECTIONS - SHADING scale 1 : 50

- *further refinement of the tower composition, including the hierarchy, design and detailing of the expressed grid and infill panels, and material/tonal relationship between facade elements*

The Applicant maintains their original response to this comment, as follows:

The podium establishes a strong, grounded base that forms a continuous built edge along the site boundary. It screens the car parking behind and contributes to a cohesive streetscape, responding to the scale of the apartment building to the east and anticipated future development to the west.

The tower above has been refined to draw colour and material cues from the podium, with selected vertical elements extended downward to visually connect the upper and lower forms. These interventions reinforce architectural continuity while preserving the distinct identity of each component.



Further refinement has been undertaken on the tower component of the building. The previously dark grey solid elements have been replaced with lighter, textured materials that reference the tonal qualities of the podium masonry. This lighter palette enhances visual contrast and reinforces the clarity of the tower's structural grid.

Painted concrete components have been substituted with a concrete stain product. This method provides a longer lasting finish by preserving the breathability of the base material, reducing future maintenance.



Notwithstanding the previous response, the material relationship and expression will be developed further through detailed design and can be reviewed further by the Government Architect through the physical samples of the final external materials selections.

- *final external material selections supported by physical samples*

As requested by the Government Architect, the Applicant will accept resolution of this through the recommended condition. As advised above, the Applicant will accept that the wording of the recommended condition be amended to also capture the further refinement of the tower composition by way of materials and colours.

- *visitor bicycle parking locations to improve convenience, legibility and safety*

The Applicant maintains their original response to this comment, as follows:

Visitor bicycle parking has been reduced in number at the Gray Street location and four (4) spaces have relocated to the building's main entrance.

Resident bicycle parking has been reconfigured to allow direct access from Gray Street without the need to enter the driveway.



Further, it is our view that additional bicycle parking at the front would unnecessarily clutter the main entrance for residents and visitors as well as reduce the activation to Franklin Street – both of which are not desirable outcomes.

- *detailed design resolution of the Gray Street public realm interface, including the resident bicycle store, landscape treatment and opportunities for activation/passive surveillance*

The Applicant maintains their original response to this comment, as follows:

The general characteristic of Gray Street is driveways, gates and roller doors with activation in the form of retail towards the Franklin Street (southern) end. The proposed development reinforces this pattern by introducing retail uses and extensive glazing along the southern portion of the frontage, complimenting the existing street character. Towards the northern end of the site, a green wall and seating area are incorporated to soften the interface and create opportunities for informal gathering and passive activation.



- *detailed resolution of integrated landscaping and facade planting.*

Noted. The Applicant will accept an appropriately worded condition or reserved matter to supply additional detail or a landscape masterplan.

City of Adelaide

Street Tree

Noting commentary regarding the setback of the canopy to the street tree limbs, no detail of the encroachment of the building into the Tree Protection Zone (approximately 4.3 metres) of the Styphnolobium (a.k.a Sophora) japonicum Pagoda Tree has been provided. As outlined in Council's previous comments, if 'tree-damaging activity' is proposed, an assessment against the Regulated and Significant Tree Overlay should occur.

The street tree on Franklin Street has a circumference of 1.2 metres and is a regulated tree. Notwithstanding, there is no intent by the Applicant to impact this tree, and the majority of its TPZ is already sealed by the asphalt footpath. It is also evident that trenching works have occurred within close proximity of the trunk, between the service pits. See images below.

We are of the view that the tree has suitably adjusted to the existing conditions, and that the proposed development would not result in tree-damaging activity. It is also clear from the photos that the canopy does not encroach within the site, and therefore pruning would not be required.





Transport, Access and Parking

'The carpark roller door should be set back 6 metres from the boundary to prevent vehicles from queuing over the footpath.'

Council response to applicant's response:

- *The proposed queuing length of 4.6 metres between the boundary and roller door does not satisfy the 6 metre per vehicle requirement of AS/NZS 2890.1:2004 Clause 3.4.*

This has been acknowledged by the Applicant and CIRQA have directly responded to this matter in their correspondence dated 11 May 2026, as follows:

The carpark roller door set back has been increased from 3.19 m to 4.59 m from the boundary. Whilst it is noted that this is still less than the 6.00 metres requested by Council, due to the low number of vehicle movements forecast to be associated with the site, the likelihood of a vehicle entering the subject site whilst a pedestrian is walking across the access is very low. Moreover, vehicles will be stored in front of the roller door for a very short duration (door opening speeds shall be maximised to minimise driver delay). As such, it is anticipated that vehicles will be stored only momentarily, with negligible impact to pedestrian movements on the adjacent footpath.

It should also be highlighted that vehicles entering (and exiting) the site are required to give way to pedestrians utilising the adjacent footpath (as per Australian Road Rules). As such, a driver would only store directly adjacent the roller door should the footpath be clear of pedestrians within close proximity. As such, the likelihood of such an instance occurring (i.e. a vehicle blocking pedestrian access) is considered very low and unlikely to occur.

'A lack of bicycle parking spaces and end of trip facilities is a concern.'

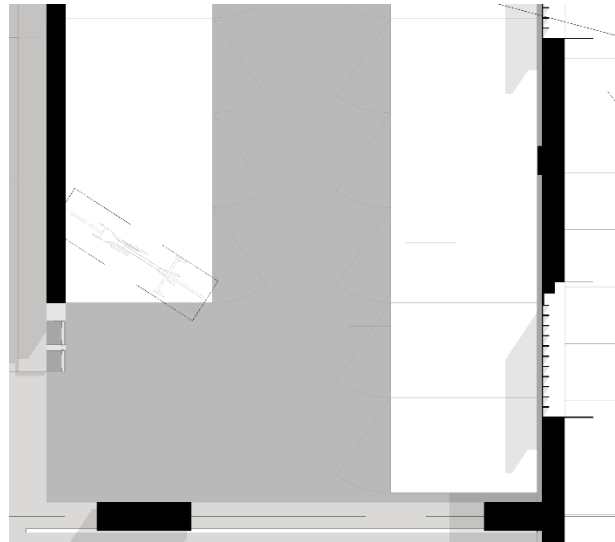
Council response to applicant's response:

- The shortfall of 67 bicycle parking spaces is not supported End of trip facilities have not been provided for the retail component.*

CIRQA have directly responded to this matter in their correspondence dated 11 May 2026, as follows:

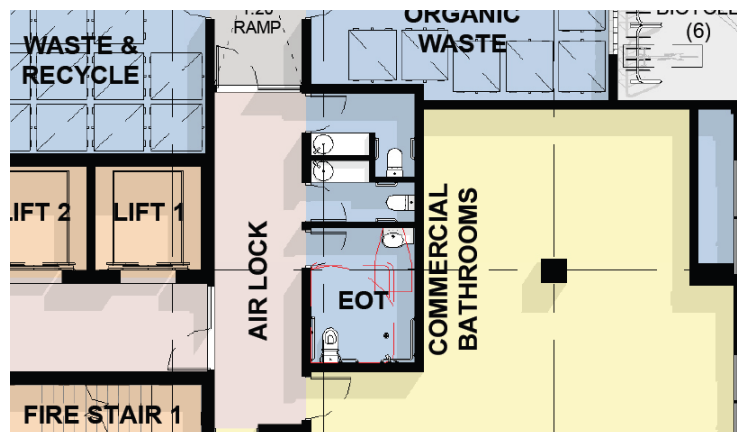
The bicycle parking provision has been increased from 35 spaces to provide 43 spaces for the site. As discussed in the traffic report, based on Austroads' rates for apartment dwellings and the Planning and Design Code rate for retail, there is a minor shortfall in bicycle parking. However, as residents commonly store their bicycles within their apartment, the consideration of the site's location within the CBD of Adelaide and the availability of public transport, it is anticipated that the proposal will appropriately accommodate likely bicycle parking demands.

Further, is also highlighted that the resident storage cages have been designed to fit many things, including bicycles, as demonstrated below.



The Applicant therefore maintains that the proposed development will appropriately accommodate likely bicycle parking demands.

Further to this, the Architectural Drawings in **Appendix 1** have been amended, which now includes an end of trip facility on the ground floor.



'The proposed northern crossover removal and widening of the southern crossover should be included on the civil plan (with dimensions) to meet the requirements of AS/NZS2890.1.'

Council response to applicant's response:

- Not addressed, please provide civil design plan.*

Noted. The Applicant will accept an appropriately worded condition or reserved matter to update the civil plan for consistency, which will occur with the provision of further stormwater details also requested by the Council.

Stormwater & Flooding

The following matters remain unresolved:

- The finished floor levels do not meet the requirement of 300mm above the top of the kerb adjacent streets*
- Retention is required (WSUD) per the State Government requirement (retention of stormwater to be used for toilets flushing and landscaping area irrigation)*
- 225 RCP connecting into trunk main on Franklin Street from new catch pit is required to be a 375 RCP which is the minimum size of RCP required*
- Clarify the purpose of the grated trench and how it connects into drainage system*
- Access driveway must have a high point to channel the runoff back to the street*
- Please provide Drains and Music model for Council consideration*

Noted. These matters will be resolved through detailed design, and the Applicant will accept an appropriately worded condition or reserved matter to this effect, which will allow for continued discussions between the project engineers and Council's engineers.

Should you have any queries, please do not hesitate to contact me. I also wish to confirm that the Applicant and PACT will be in attendance at the SCAP hearing to respond to any commentary from the Council and Government Architect, as well as any queries from the Panel.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M Dickson', with a long, sweeping horizontal line extending to the right.

Michael Dickson
Associate Director

01 May 2026

Future Urban
Attn: Michael Dickson
Level 1, 74 Pirie Street
Adelaide, SA 5000

Dear Mr. Dickson,

RE: 26000407 – 260 Franklin Street, Adelaide

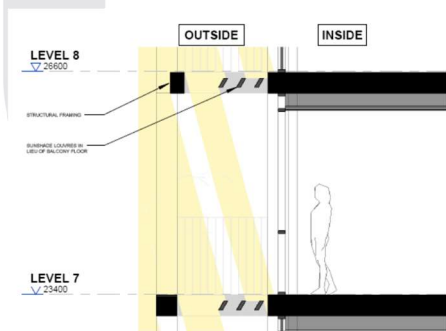
Please see below responses to specific queries outlined in the above referenced Request for Information from the Senior Planning Officer, Commission Assessment – DHUD.

Architectural planning package “24170 - 260 Franklin Street - For Approval - P2 - 2026.04.10” has been updated to reflect changes incorporating various authority partner comments.

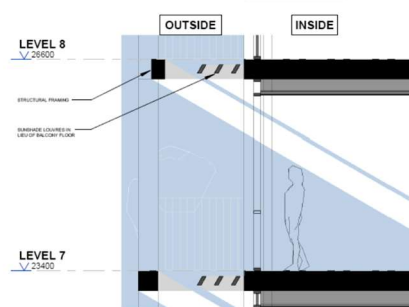
- Consideration of northern and western Shading Devices.

Additional strategies have been implemented to shade the northern and western facades (plan and section pages). Where balconies are not provided on the northern side (centre) horizontal shading louvres are provided.

The number and angle of members is designed such that winter sun is not excluded. A similar strategy is utilised on the eastern and western facades where fixed shading devices are provided above windows where balconies are not present. Sunshades have separation gaps to allow abseil window cleaning access.



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- Podium legibility

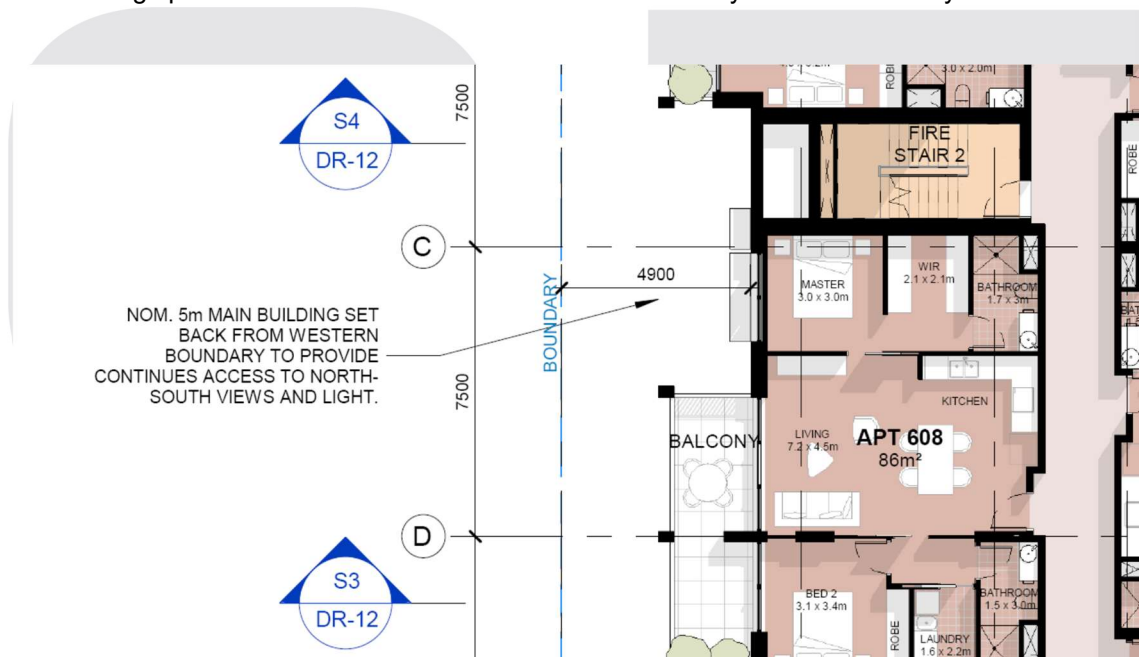
The podium establishes a strong, grounded base that forms a continuous built edge along the site boundary. It screens the car parking behind and contributes to a cohesive streetscape, responding to the scale of the apartment building to the east and anticipated future development to the west.

The tower above has been refined to draw colour and material cues from the podium, with selected vertical elements extended downward to visually connect the upper and lower forms. These interventions reinforce architectural continuity while preserving the distinct identity of each component.



- Future proofing western interface

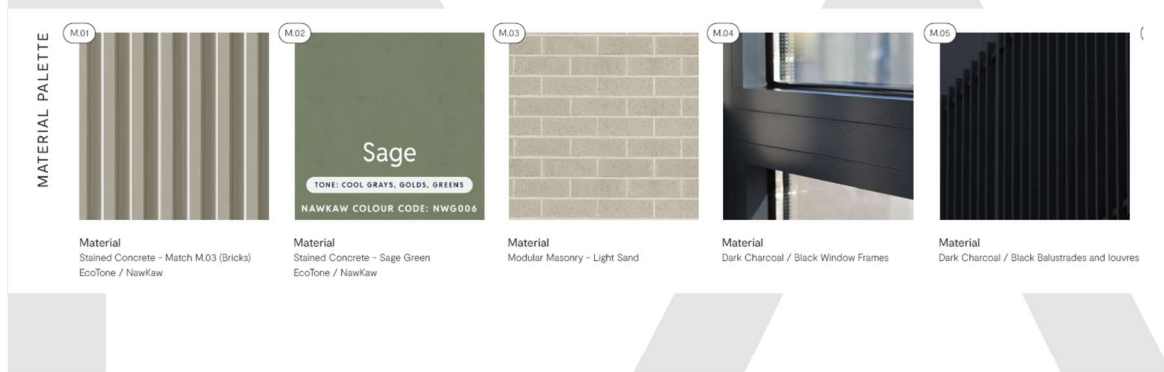
West facing apartments and balconies have been set back away from the boundary interface.



- Resolution of the grid, materiality and cohesive expression

Further refinement has been undertaken on the tower component of the building. The previously dark grey solid elements have been replaced with lighter, textured materials that reference the tonal qualities of the podium masonry. This lighter palette enhances visual contrast and reinforces the clarity of the tower’s structural grid.

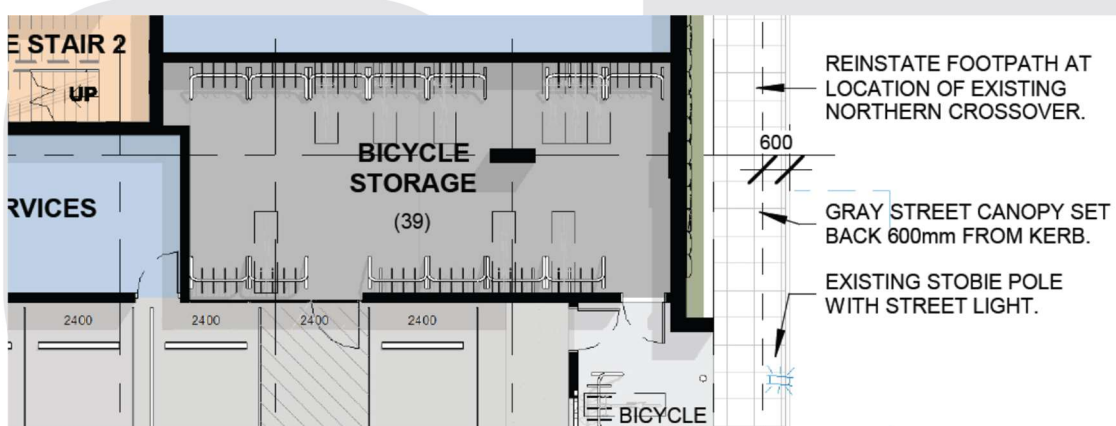
Painted concrete components have been substituted with a concrete stain product. This method provides a longer lasting finish by preserving the breathability of the base material, reducing future maintenance. Precedents + Materiality page has been updated.



- Consideration of alternate bicycle parking location

Visitor bicycle parking has been reduced in number at the Gray Street location and four (4) spaces have relocated to the building’s main entrance.

Resident bicycle parking has been reconfigured to allow direct access from Gray Street without the need to enter the driveway.



- Review opportunities to further activate Gray Street

The general characteristic of Gray Street is driveways, gates and roller doors with activation in the form of retail towards the Franklin Street (southern) end. The proposed development reinforces this pattern by introducing retail uses and extensive glazing along the southern portion of the frontage, complimenting the existing street character. Towards the northern end of the site, a green wall and seating area are incorporated to soften the interface and create opportunities for informal gathering and passive activation.



Gray Street looking south - Car Park Entry, Services and Living Wall

- Provision of internal planting and additional communal space

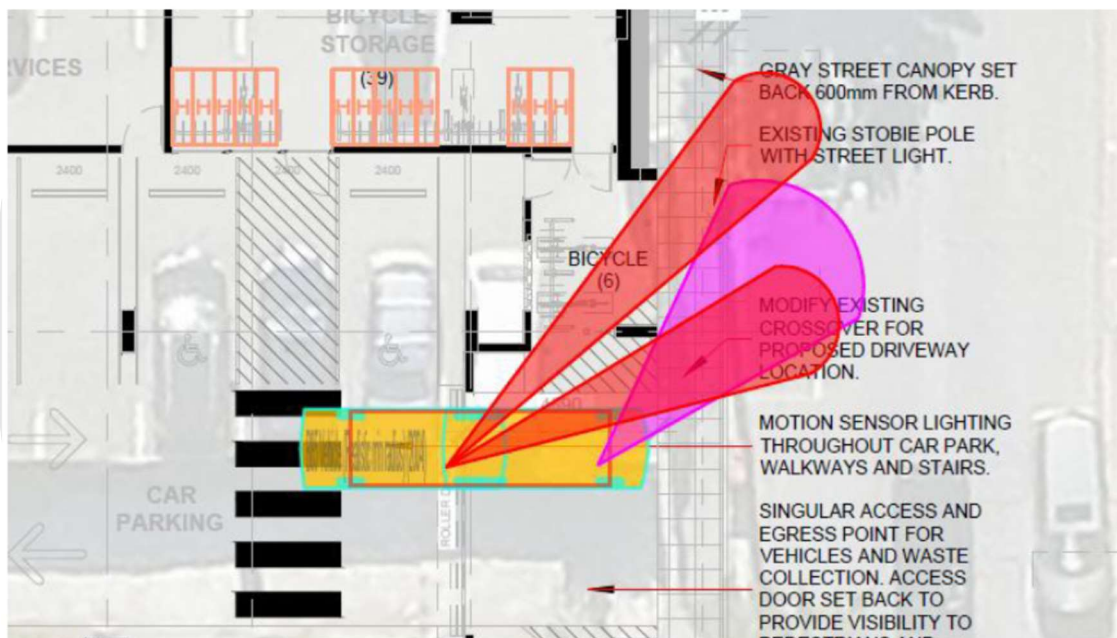
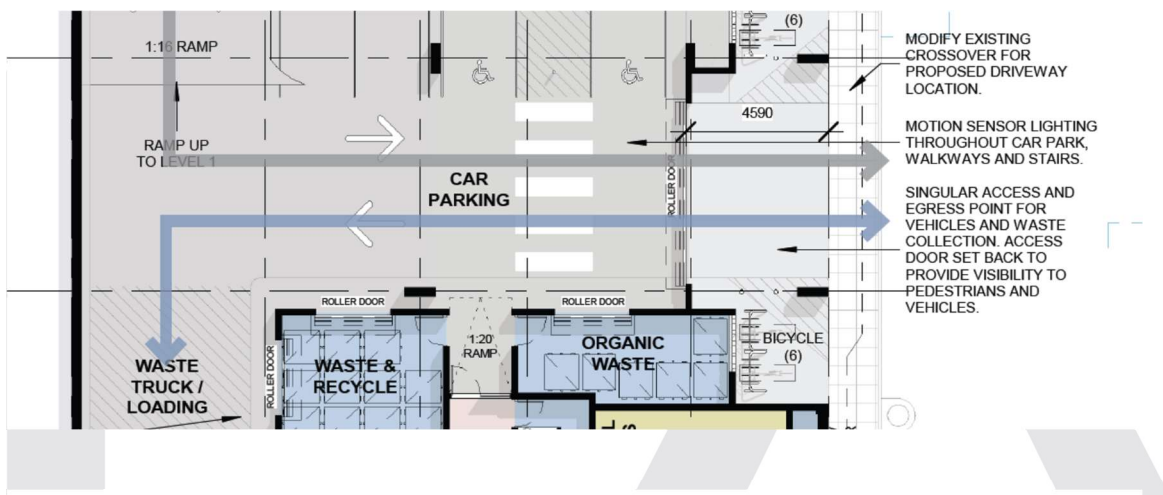
The proposal provides a comprehensive approach to planting and landscape integration. The development includes a generous communal space on level 3, offering both indoor and outdoor amenity that meet the needs of the residents.

Landscape elements are incorporated throughout the design including façade integrated planting and a green wall at ground level. This ensures greenery is visible and accessible across multiple levels of the building.



- Car park roller door, vehicle cueing and sign lines.

The space between the car park roller door and the footpath have been increased with the aim to reduce cueing and provide better sign lines for vehicular access and egress. Please refer to Cirqa reports and RFI responses '25211 Ben Hewitson 01May26.pdf' and '25211 Mixed-Use 254-260 Franklin Street Adelaide 29Apr26 V1.1.pdf' for further details.



- Bicycle parking spaces and end of trip facility

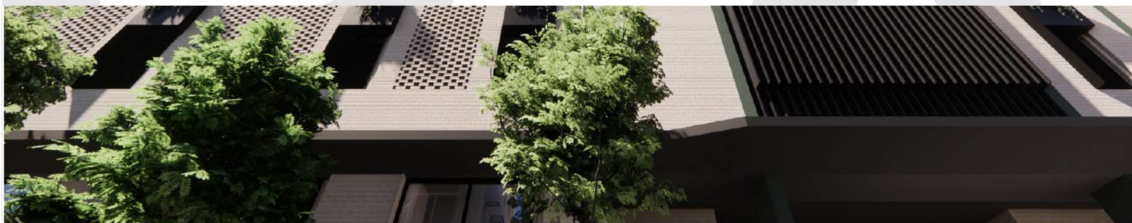
The revised proposal increases the number of residential bicycle parking spaces and provides direct access from Gray Street. An End of Trip facility is not required as each apartment includes a bathroom.

- Stormwater and civil plans

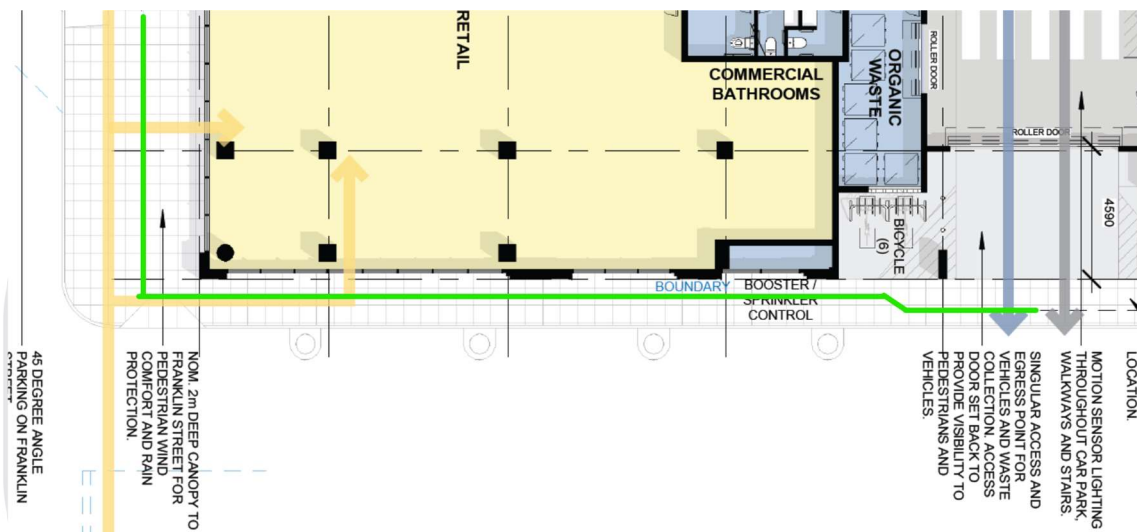
The revised civil and stormwater plans are included. Levels within the building including an upstand to north eastern retail façade glazing have been incorporated in the architectural design.

- Tree damaging activates due to canopy and canopy encroachments

The canopy depth along Gray Street has been considered in relation to pedestrian comfort, particularly wind and rain protection, as well as existing street trees. Along the southern end of Gray Street, the canopy in the vicinity of the street trees has been reduced to just 600mm off the building line, providing sufficient allowances for a gutter and lighting. At the vehicle access point the canopy has been set back 600mm from the kerb line to maintain appropriate clearance for tall vehicles. Please refer to updated Ground plan. Note that where the street trees are located, the canopy is pulled back off the kerb even further to accommodate the street trees.



View from Gray Street looking up

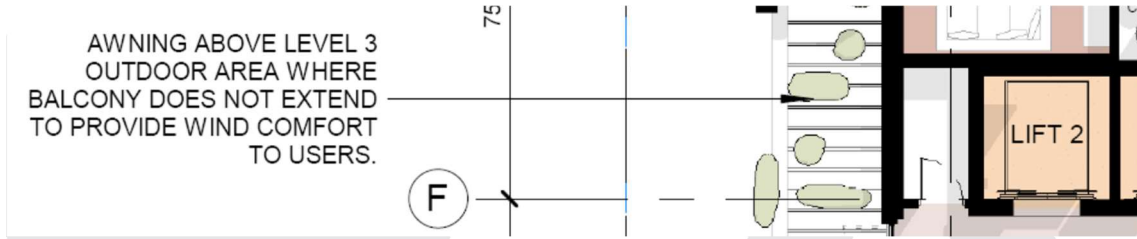


- Vehicle movement during waste collection

It is anticipated that vehicles will be able to safely manoeuvre into and out of the car park entry and ramp while the waste truck is undertaking loading operations.

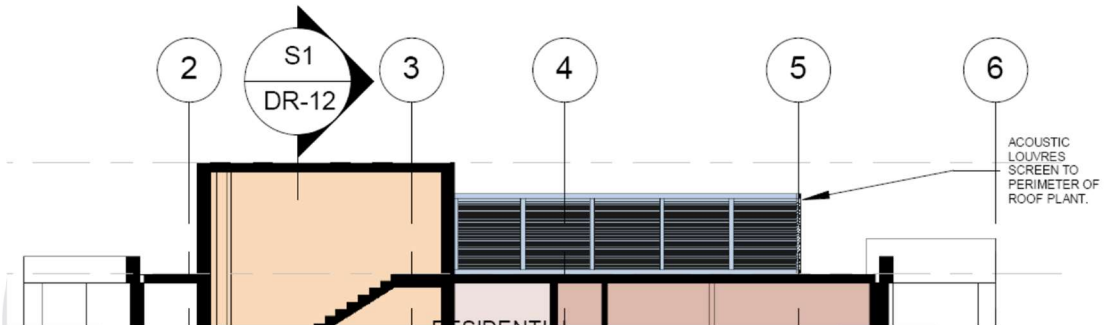
- Wind report awning to level 3 communal area

In most instances, the balconies project beyond the façade above forming the 'awning', maintaining a consistent vertical alignment of outdoor spaces. Where this condition does not occur above the Level 3 communal area, a fixed louvred structure has been introduced to provide appropriate coverage and visual continuity. Refer to the building sections and the Level 4 plan (Grid F) for further detail.



- Rooftop plant screen material and noise attenuation.

The rooftop plant will be screened by an acoustic louvre plant screen wall. Roof plans and sections have notes added to clarify.



If you have any queries, please don't hesitate to contact me.

Kind regards,

Ben Hewitson
PACT architects

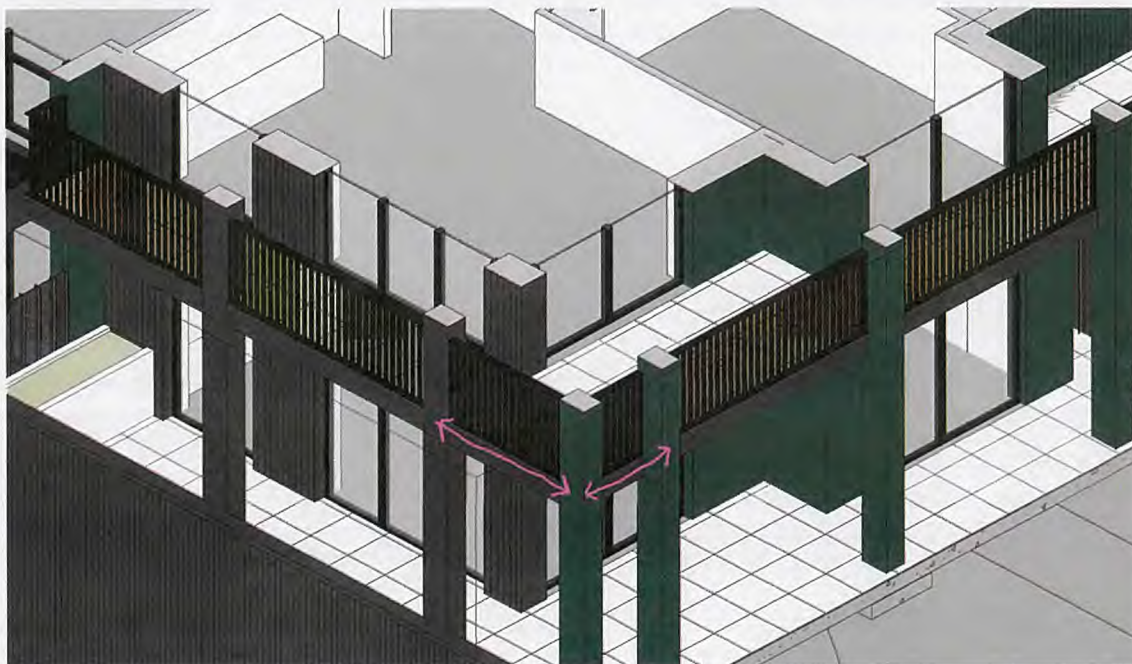
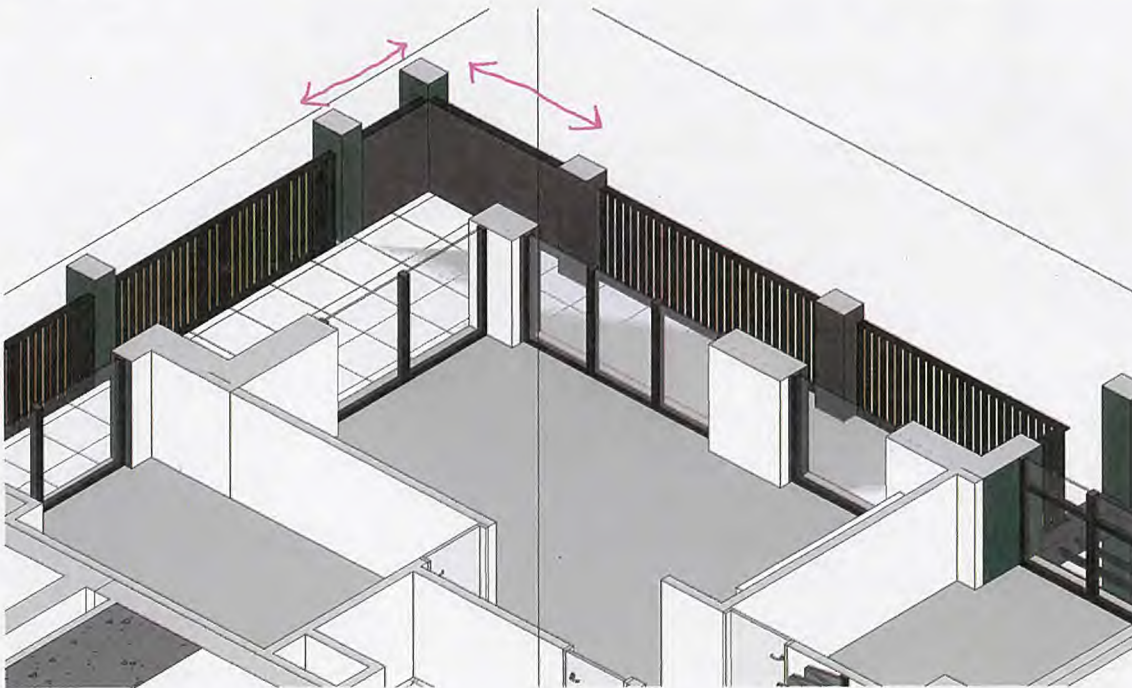
Reid, Joanne (DHUD)

From: Ben Hewitson <ben@pactarchitects.com.au>
Sent: Thursday, 11 June 2026 12:07 PM
To: Reid, Joanne (DHUD); Michael Dickson
Subject: RE: 26000407 | 260 Franklin Street, Adelaide

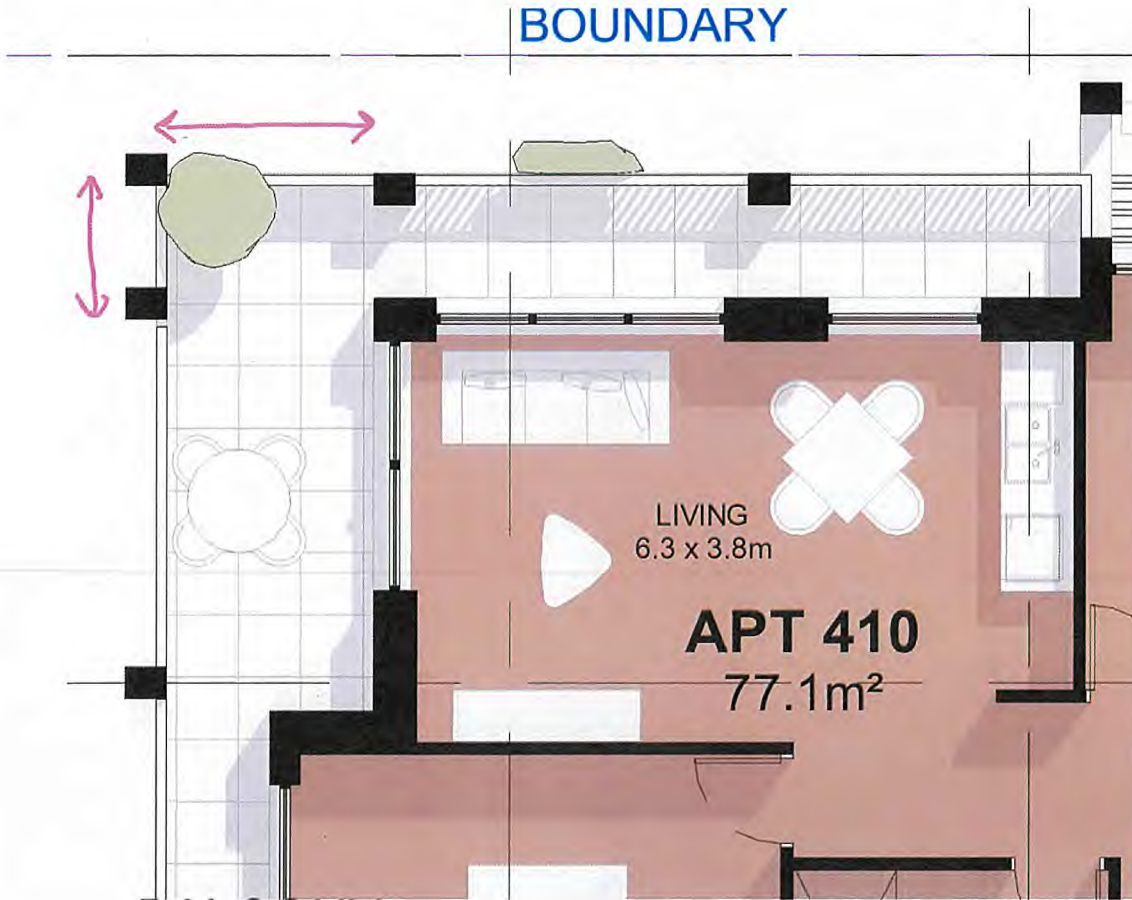
Good Afternoon Joanne,

Thanks for highlighting this item as we haven't noted on the drawings and they infill parts don't show up all that well drawings. We intend to incorporate a solid layer to the metal balustrades between the column supports in the north-west, north-east and south-west balustrades of the level 4 and above balconies (Level 3 is solid due to the nature of the podium).

We are currently showing this screen in the first bays of the corners but can easily extend as required, balancing views etc.



BOUNDARY



Regards

Ben Hewitson
Director, Architect
0402 741 548

**PA
CT**

A pact is a promise. A commitment.

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Adelaide SA 5000

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PACT architects

From: Reid, Joanne (DHUD) <joanne.reid@sa.gov.au>
Sent: Thursday, 11 June 2026 11:55 AM
To: Michael Dickson <michaeld@futureurban.com.au>
Cc: Ben Hewitson <ben@pactarchitects.com.au>
Subject: RE: 26000407 | 260 Franklin Street, Adelaide

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