

March 31, 2025

Joanne Reid  
Senior Planner  
Planning and Land Use Services  
State Planning Commission

Via PlanSA Portal

Dear Joanne,

## **AMENDED APPLICATION 24024441 – UNITING SA, BOWDEN**

Future Urban acts for Uniting SA ("Applicant") in relation to the abovementioned development application on Market Place and Hawker Street in Bowden.

Uniting SA is a leading and experienced community housing provider. This proposal will house women aged 55+ and has received \$7 million in Federal funding to provide affordable housing for some of our State's most vulnerable population, addressing the very real, affordable housing shortage, not only in this State, but Australia-wide.

Previously we responded to the representations and matters raised by the State Planning Commission ('the Commission'). Since that time the Applicant has continued liaising with relevant parties, and further attempted to appease representors and the Commission by proposing an additional reduction in dwelling numbers, resulting in a lower building height.

The application was originally for a three-storey residential flat building accommodating community housing (40 dwellings) and supported accommodation (two dwellings), two-storey group dwellings (six dwellings) and demolition of buildings including one representative building.

It was then amended to remove the two-storey group dwellings and replace these with off-street car parking.

The subject amendment now presented to the Commission is for a two-storey residential flat building accommodating community housing (28 dwellings) and supported accommodation (two dwellings), with 34 off-street parking spaces. It remains for the provision of housing women aged 55 and over who are currently or at risk of experiencing homelessness.

We note the essential nature of the proposed development is not changed, rather the intensity is reduced in response to matters raised during the assessment process, also resulting in reduced building height.

Section 119(9) of the *Planning, Development and Infrastructure Act 2016* allows a relevant authority to permit an applicant to vary an application, including any plans, drawings or other documents. Regulation 35(3) of the *Planning, Development and Infrastructure (General) Regulations 2017* allows the authority to consider the application without need to repeat referral process or public notification.

We contend the variations are not substantial and the relevant authority can continue to assess the application.

## **Assessment**

The Applicant has further amended the proposal in response to the representations submitted and matters raised by the Commission.

Essentially the overall density of the development has reduced to a total of 30 dwelling units, two of which are for supported accommodation, and on-site parking has increased to 34 spaces.

The amended application should be read in conjunction with amended details listed below:

- Architectural drawings prepared by City Collective (**Appendix A**);
- Civil and stormwater details prepared by CPR Engineers (**Appendix B**);
- Heritage character impact statement prepared by DASH Architects (**Appendix C**);
- Traffic and parking impact statement prepared by CIRQA (**Appendix D**); and
- Waste management plan prepared by Rawtec (**Appendix E**).

The arborist report previously provided remains unchanged and relevant to the application.

Key matters the Commission remained concerned with relate to building height in the historic streetscape and off-street parking.

These are discussed in further detail below.

### **Building Height in Historic Streetscape**

Representors and the Commission considered that the historic and established character is that of single and two-storey detached and semi-detached dwellings.

While we considered that the previous design included appropriate architectural features to reduce massing and appear largely as a two-storey building, i.e. use of mansard roofing, the Applicant has now reduced the building height to two-storeys, and eight metres at its highest.

The revised scheme both physically and visually addresses the two-storey built form expected by the Commission. DASH Architects provided an amended heritage impact statement confirming that the proposed two storey apartments are generally consistent with the surrounding context and setting of the site.

### **Parking and Traffic**

The proposal now includes 28 social housing dwellings and two supported accommodation dwellings.

The Housing Renewal module of the Code provides relevant guidelines for social housing and the Transport, Access and Parking module provides guidelines for supported accommodation.

Using these guidelines, the proposal has a theoretical demand of 36.2 spaces, comprised by:

- resident parking spaces (28 spaces);
- resident visitor parking spaces (7 spaces); and
- supported accommodation spaces (1.2 spaces).

Rounding this figure up to 37 spaces results in a theoretical parking shortfall of 3 spaces.

Notwithstanding, CIRQA's parking and traffic report supports the development, noting that:

- high frequency public transport services will therefore be available within the site's immediate proximity and be readily available to apartment residents and their visitors;
- if the Affordable Housing Overlay was applicable, only nine off-street parking space would be required for residents instead of 28 spaces;
- Uniting SA manages the selection of tenants for sites under its management including selection of residents who do not have a motor vehicle;
- the proposed 26 bicycle parks are expected to meet the needs of the resident cohort; and
- the additional forecast volumes associated with the proposed development (in the order of 10 additional am and 4 additional pm peak hour trips) are low and will be readily accommodated on the adjacent road network with minimal impact upon its operation.

We note the Affordable Housing Overlay is proposed by the Greater Adelaide Regional Plan (GARP) to be applied to this area. Furthermore, the proposed social housing is affordable housing. For these reasons it is entirely acceptable to consider the rates provided under the Affordable Housing Overlay for this development.

## **Summary**

The proposal is an important project that will positively affect the lives of homeless women aged 55 and over by providing improved social housing in an area close to services. Planning authorities have a social responsibility to ensure community housing is provided in appropriate locations.

Housing affordability and homelessness are the crucible of our time that must be faced head on for real solutions and outcomes.

The site is already used for social housing, albeit at a lower density but has well and truly passed its used by date. The only way to increase this much needed housing product is to increase the density of housing on the site in a contemporary and fit for purpose design.

Further amendments to the proposal address the Commission's concerns with respect to building height and theoretical parking shortfall, notwithstanding the proposal provides significantly more car parking spaces if the Affordable Housing Overlay provisions in the Code were to apply (which they will post implementation of the GARP Code Amendment).

We understand the application now addresses the key matters raised by the Commission.

Feel free to contact me if you have any further queries.

Yours sincerely,



**Marc Duncan**  
Director

June 3, 2025

Joanne Reid  
Senior Planner  
Planning and Land Use Services  
State Planning Commission

Via email: [joanne.reid@sa.gov.au](mailto:joanne.reid@sa.gov.au)

Dear Joanne,

## **RESPONSE TO RELEVANT AUTHORITY | APPLICATION 24024441 – UNITING SA, BOWDEN**

Future Urban acts for Uniting SA ("Applicant") in relation to the abovementioned development application on Market Place and Hawker Street in Bowden.

Recently you requested additional details in relation to the proposed housing. Most of the requests relates to the operation of the site.

This letter responds to the matters in your email, in the same order as your email.

### **Response**

#### **Management Plan**

State Planning Commission

1. *Details on tenant management would assist in describing how the site functions.*

Applicant response:

1. *Uniting SA's commitment to housing women aged 55 and over is stated in a funding Project Agreement with the South Australian Housing Trust.*

*Under this agreement, the housing is specifically designated for older women at risk of homelessness, with particular focus on those aged 55 and above.*

*In addition, the project has been submitted for Housing Australia Future Fund (HAFF) funding. The funding agreement for HAFF is currently under review and discussion.*

*Notwithstanding, the proposal clearly states that the funding is for housing women aged 55 and over who are at risk of homelessness.*

*The HAFF funding is structured as an annual financial contribution over a 25-year term, with a requirement that UnitingSA provides regular evidence of compliance, including reporting on the target cohort being housed.*

*In addition to the above, a Federation Funding Agreement applies. This agreement was executed to permanently increase social housing. Under this agreement the*

*Commonwealth can recover an amount provided should the housing project not be delivered in accordance with that agreement.*

*This further reinforces UnitingSA's long-term commitment to supporting vulnerable older women through stable and secure housing.*

## **Waste**

State Planning Commission:

1. *There is a loss of on-street parking during waste collection days. What currently occurs with bin collection for existing properties? Do existing residents leave bins on Market Place, and is there an issue with rubbish collection.*
2. *Council has raised concerns in relation to the rubbish chutes not being available for recycling which could result in the people not bothering to recycle if they have to take the rubbish to the recycling bins on the ground floor themselves. Is there a solution to this?*

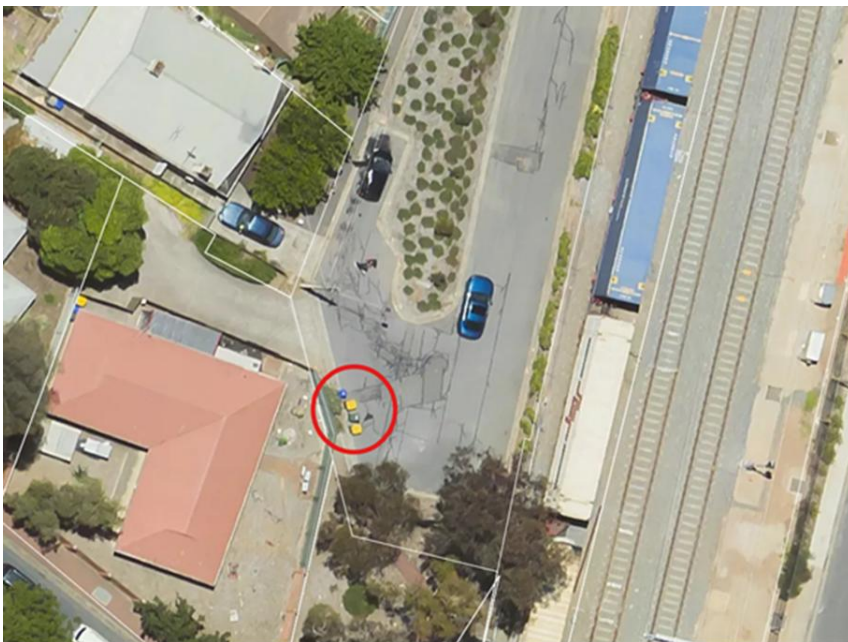
Applicant response:

1. *The loss of on-street parking during waste collection days is temporary and only for a very short period. The traffic report prepared and submitted by CIRQA confirms the acceptability of the arrangement, also noting the author of the report, Chris Bentick is the former traffic engineer for the City of Charles Sturt.*

*Based upon this empirical knowledge it appears that the existing 90-degree parking spaces on Market Place were installed as part of the Road Rehabilitation of Market Place and Thirteenth Street in 2022/23 to increase on-street parking capacity in the wider Bowden and Ovingham areas. However, this initiative appears to have been implemented without due consideration to service vehicle access requirements on Market Place i.e. these on-street parking spaces impede the ability of service vehicles to turn conveniently within the Market Place cul-de-sac.*

*The development proposes only temporary restriction of these parking spaces at waste collection time, as part of the site's waste management plan. However, it could be argued that these spaces should be permanently restricted by the Council to ensure that service vehicles, including refuse vehicles, delivery trucks and emergency service vehicles, are able to enter and exit Market Place via Gibson Street in a forward direction.*

*In short, the proposed parking restrictions seek to ensure that waste vehicles can service the development, which is an access requirement that applies to the existing dwellings on the site, we note presently bins are collected on Market Place, as evidenced by the aerial photos below.*



2. *It is not uncommon for residents to have to walk from their kitchen to their recycle bin, which can often be located at the opposite side of an allotment. Recycling is encouraged by the fact that greater storage for recycling is provided.*

*Furthermore, the Applicant can incorporate dual pull-out bins in apartment kitchens for waste and recycling.*

## **Car Parking**

### **State Planning Commission**

1. *How will visitor parking work if the car parks are located behind a roller door? In favour of roller door, however need to determine how this works.*

Applicant response

1. *Roller door can be opened through intercom in each apartment.*

## **Overlooking**

*State Planning Commission*

1. *Lack of clarity regarding balconies of apartments 112-114. Plans say 'balcony height' to 1.5m to prevent overlooking, should it say 'balustrade height'? Plans should also nominate the materials that will be used to restrict views.*

*Applicant response:*

1. *Plans will be amended to confirm balcony screen height is 1.5m to prevent overlooking.*

*Material details have not been selected, however can be provided via a reserved matter or condition of planning consent.*

## **Summary**

The above information confirms:

- UnitingSA's project agreement with the South Australian Housing Trust specifically designates housing for older women at risk of homelessness. Furthermore Federal funding can be recovered should the housing project not be delivered in accordance with the Federation Funding Agreement;
- restrictions to Market Street on-street parking is only temporary, and it improves service vehicle accessibility to the site;
- dual pull-out bins within kitchens further encourages individual recycling;
- the roller door permitting visitor parking access can be opened through internal intercoms; and
- privacy screen details/materials can be a condition of planning consent.

We thank you for the opportunity to provide additional information in support of the application.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'TJ' or 'Theresa'.

**Theresa James**  
Associate Director