

Details of Representations

Application Summary

Application ID	24024441
Proposal	Two-storey residential flat building comprising community housing dwellings (28) and supported accommodation premises (2) and demolition of buildings including one Representative Building with associated car parking and landscaping
Location	105 GIBSON ST BOWDEN SA 5007, 12 MARKET PL BOWDEN SA 5007, 16 MARKET PL BOWDEN SA 5007, 18 MARKET PL BOWDEN SA 5007, 2 -10 MARKET PL BOWDEN SA 5007

Representations

Representor 1 - Stephen Hamblin

Name	Stephen Hamblin
Address	18 Thirteenth Street BOWDEN SA, 5007 Australia
Submission Date	28/04/2025 04:13 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

Reasons

I objected to the original application for the development of this site and I continue to object on the exact same grounds. The updated proposal still does not adhere to the Planning and design code for the location. As I understand it, the size of the site allows for a maximum of 13 dwellings and a 6m height limit. If the site is to be developed, then it should adhere to these requirements. Otherwise, why have a code in the first place? As I (and I'm sure many others) pointed out in our objections to the first application, the location is a small quiet cul-de-sac that cannot (and should not) be developed into a high-density housing project. It will create congestion in an already crowded suburb and will create an eye-sore with a "block of flats" being a part of the development. I also have concerns regarding the social impact of high-density social housing. There is plenty of evidence to suggest that this creates negative outcomes, when compared with lower density and more spread-out solutions. The solution to the "housing crisis" should not be in defiance of all rules and codes. Otherwise we will simply be solving one problem and creating another. Further, the updated application still does not provide for the required number of car parks, based on the number of dwellings. I hope that the application will be judged against the required code and therefore denied in it's entirety. The site allows for 13 dwellings. So that is all that should be allowed.

Attached Documents

Representations

Representor 3 - matthew sauer

Name	matthew sauer
Address	38 Chief St, BROMPTON SA ADELAIDE SA, 5007 Australia
Submission Date	23/04/2025 02:13 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

This development was (in another form) submitted previously, and was met with huge community backlash, the applicants were unwilling to work with community concerns, but knew this would not be approved at SCAP and have submitted this new application in response. I strongly encourage anyone involved to please look at all of the objections to the previous application as many hours and much expensed was incurred at that time, AND, the re-working of this application has been feeble in its attempts to rectify the presented problems. The Development Plan would allow for 12 dwellings, 30 is clearly far at variance to the plan. This will lead to congested streets, lack of parking on street for current and projected residents, especially bearing in mind its proximity to a park, school and church. Poor access to bin collection and emergency vehicles. Inadequate off-street parking. This application is not in the ballpark needed for approval, and I understand that reducing the number of dwellings may make it unviable economically, but that's not our problem. Our duty is to respect and protect the community and fortunately, we have a Development Plan to spell out for us that the density of dwellings proposed is 250% what is envisioned. This should be an easy one to reject. Thankyou

Attached Documents

Representations

Representor 4 - Tegan Vessali

Name	Tegan Vessali
Address	27 Gilbert Street OVENINGHAM 5082 OVINGHAM SA, 5082 Australia
Submission Date	23/04/2025 07:13 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 write to formally object to Development Application DA 42024441, which proposes the construction of 30 public housing units at Market Place, Bowden. While the need for social and affordable housing is recognised, this proposal is inappropriate for this specific site due to its heritage significance, inconsistency with the existing urban character, and failure to align with the Charles Sturt Development Plan and the relevant heritage overlay controls.

1. Demolition of a Heritage-Listed Property The proposal includes the demolition of a heritage-listed dwelling, which is unacceptable in a heritage overlay area. The Charles Sturt Development Plan explicitly protects contributory buildings and streetscape character within Heritage Policy Areas. Demolishing a historically significant structure to make way for high-density housing is in direct conflict with these provisions. These types of dwellings form part of Bowden's architectural and cultural identity and must be preserved in accordance with Council's heritage guidelines.

2. Inconsistent with Heritage Overlay and Facade Requirements Under the City of Charles Sturt's Residential Development Code and Heritage Overlay provisions, any new development must be sympathetic to the prevailing character and scale of the streetscape, particularly in areas identified for their heritage value. The proposed apartment complex fails to reflect the scale, bulk, massing, or facade treatments of surrounding properties. It does not provide an appropriate transition in scale and lacks the architectural sensitivity required by development in a heritage context.

3. Overdevelopment and Zoning Conflicts The proposal appears to exceed acceptable density limits and undermines the planning intent of the zone, which prioritises medium-density development integrated with existing character. A 30-unit complex in this location constitutes an overdevelopment of the site, with insufficient setbacks, overshadowing impacts, and compromised amenity for future occupants and surrounding residents.

4. Strain on Local Infrastructure Local infrastructure – including parking, roads, public transport, and green spaces – is not currently equipped to support such a dense residential development. The proposal provides limited on-site parking, which will likely result in increased congestion in adjacent streets. This is inconsistent with the Charles Sturt Council's goals for sustainable urban infill that complements existing services and infrastructure.

5. Social and Community Impact The concentration of a large number of public housing units in a single development contradicts contemporary planning principles that promote social inclusion through a mix of tenure types. The scale and nature of the proposal risk creating social divisions rather than fostering an integrated community.

Environmental and Streetscape Impact The removal of established trees and significant disruption to green space further detracts from the area's visual and environmental quality. The design does not appear to provide adequate private or communal open space, nor does it enhance the public realm as expected of developments in key renewal precincts. For the reasons outlined above – including the loss of a heritage asset, the failure to comply with the heritage overlay requirements, and the overall incompatibility with the established character and planning policy – I strongly object to Development Application DA 42024441. I respectfully urge the State Commission Assessment Panel to reject the proposal in its current form and request a revised development that preserves the area's heritage, respects the streetscape, and aligns with planning objectives under the Charles Sturt Development Plan.

Attached Documents

Representations

Representor 5 - John Doran

Name	John Doran
Address	29 Gilbert street OVINGHAM SA, 5082 Australia
Submission Date	23/04/2025 07:18 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 There are too many apartments for the heritage overlay area	

Attached Documents

Representations

Representor 6 - Ali Vessali

Name	Ali Vessali
Address	27 Gilbert St OVINGHAM SA, 5082 Australia
Submission Date	23/04/2025 07:35 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

Reasons

To whom it may concern, Although I appreciate that United has made slight efforts to adhere to the requirements of the area, there are many conditions that are still blatantly not met. Firstly our area is in a historic overlay, there are many requirements that im sure you are aware of that are not met here. To name a few- a heritage facade, density of the development and also the destruction of heritage buildings and the trees that will not be savable with the scale of development being as such. I think it is extremely important that this proposal is looked at purely on its current merits, without consideration of the previous proposal which was absolutely ridiculous. It fells very much as though United has offered a very dense product in 2024 knowing they were pushing the envelope, and hoped we would meet this proposal eagerly because it is an improvement. However this smoke and mirrors tactic just makes them look desperate to maximize profits on a parcel of land that is in essence entirely owned by a private "non-for-profit" company (id love to know the salaries of their executive to put that in perspective as this seems to be purely about making money). My wife and i are looking at subdivision potential of our own block, and the precedence set by this development will be very useful in knowing whether or not we can fit more than 2 properties on our own 740 sq metre block. Obviously we would love to fit 6 units on as outlined in this proposals density request. In saying that, we currently love where we live, and this would severely undermine the feelings we have toward the area, although would provide a profitable "way out" by way of the precedence you would set. Regards Ali Vessali

Attached Documents

Representations

Representor 8 - Amy Doran

Name	Amy Doran
Address	29 Gilbert Street OVINGHAM SA, 5082 Australia
Submission Date	23/04/2025 07:45 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 write to formally object to Development Application DA 42024441, which proposes the construction of 30 public housing units at Market Place, Bowden. While the need for social and affordable housing is recognised, this proposal is inappropriate for this specific site due to its heritage significance, inconsistency with the existing urban character, and failure to align with the Charles Sturt Development Plan and the relevant heritage overlay controls.

1. Demolition of a Heritage-Listed Property The proposal includes the demolition of a heritage-listed dwelling, which is unacceptable in a heritage overlay area. The Charles Sturt Development Plan explicitly protects contributory buildings and streetscape character within Heritage Policy Areas. Demolishing a historically significant structure to make way for high-density housing is in direct conflict with these provisions. These types of dwellings form part of Bowden's architectural and cultural identity and must be preserved in accordance with Council's heritage guidelines.

2. Inconsistent with Heritage Overlay and Facade Requirements Under the City of Charles Sturt's Residential Development Code and Heritage Overlay provisions, any new development must be sympathetic to the prevailing character and scale of the streetscape, particularly in areas identified for their heritage value. The proposed apartment complex fails to reflect the scale, bulk, massing, or facade treatments of surrounding properties. It does not provide an appropriate transition in scale and lacks the architectural sensitivity required by development in a heritage context.

3. Overdevelopment and Zoning Conflicts The proposal appears to exceed acceptable density limits and undermines the planning intent of the zone, which prioritises medium-density development integrated with existing character. A 30-unit complex in this location constitutes an overdevelopment of the site, with insufficient setbacks, overshadowing impacts, and compromised amenity for future occupants and surrounding residents.

4. Strain on Local Infrastructure Local infrastructure – including parking, roads, public transport, and green spaces – is not currently equipped to support such a dense residential development. The proposal provides limited on-site parking, which will likely result in increased congestion in adjacent streets. This is inconsistent with the Charles Sturt Council's goals for sustainable urban infill that complements existing services and infrastructure.

5. Social and Community Impact The concentration of a large number of public housing units in a single development contradicts contemporary planning principles that promote social inclusion through a mix of tenure types. The scale and nature of the proposal risk creating social divisions rather than fostering an integrated community.

Environmental and Streetscape Impact The removal of established trees and significant disruption to green space further detracts from the area's visual and environmental quality. The design does not appear to provide adequate private or communal open space, nor does it enhance the public realm as expected of developments in key renewal precincts. For the reasons outlined above – including the loss of a heritage asset, the failure to comply with the heritage overlay requirements, and the overall incompatibility with the established character and planning policy – I strongly object to Development Application DA 42024441. I respectfully urge the State Commission Assessment Panel to reject the proposal in its current form and request a revised development that preserves the area's heritage, respects the streetscape, and aligns with planning objectives under the Charles Sturt Development Plan.

Attached Documents

Representations

Representor 9 - Michael Neindorf

Name	Michael Neindorf
Address	24 Gilbert street OVINGHAM SA, 5082 Australia
Submission Date	24/04/2025 12:10 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

I write to formally object to Development Application DA 42024441, which proposes the construction of 30 public housing units at Market Place, Bowden. While the need for social and affordable housing is recognised, this proposal is inappropriate for this specific site due to its heritage significance, inconsistency with the existing urban character, and failure to align with the Charles Sturt Development Plan and the relevant heritage overlay controls.

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2. Inconsistent with Heritage Overlay and Facade Requirements Under the City of Charles Sturt's Residential Development Code and Heritage Overlay provisions, any new development must be sympathetic to the prevailing character and scale of the streetscape, particularly in areas identified for their heritage value. The proposed apartment complex fails to reflect the scale, bulk, massing, or facade treatments of surrounding properties. It does not provide an appropriate transition in scale and lacks the architectural sensitivity required by development in a heritage context.

3. Overdevelopment and Zoning Conflicts The proposal appears to exceed acceptable density limits and undermines the planning intent of the zone, which prioritises medium-density development integrated with existing character. A 30-unit complex in this location constitutes an overdevelopment of the site, with insufficient setbacks, overshadowing impacts, and compromised amenity for future occupants and surrounding residents.

4. Strain on Local Infrastructure Local infrastructure – including parking, roads, public transport, and green spaces – is not currently equipped to support such a dense residential development. The proposal provides limited on-site parking, which will likely result in increased congestion in adjacent streets. This is inconsistent with the Charles Sturt Council's goals for sustainable urban infill that complements existing services and infrastructure.

5. Social and Community Impact The concentration of a large number of public housing units in a single development contradicts contemporary planning principles that promote social inclusion through a mix of tenure types. The scale and nature of the proposal risk creating social divisions rather than fostering an integrated community.

Environmental and Streetscape Impact The removal of established trees and significant disruption to green space further detracts from the area's visual and environmental quality. The design does not appear to provide adequate private or communal open space, nor does it enhance the public realm as expected of developments in key renewal precincts. For the reasons outlined above – including the loss of a heritage asset, the failure to comply with the heritage overlay requirements, and the overall incompatibility with the established character and planning policy – I strongly object to Development Application DA 42024441. I respectfully urge the State Commission Assessment Panel to reject the proposal in its current form and request a revised development that preserves the area's heritage, respects the streetscape, and aligns with planning objectives under the Charles Sturt Development Plan.

Attached Documents

Representations

Representor 10 - Stephanie Wright

Name	Stephanie Wright
Address	108 East St, Brompton ADELAIDE SA, 5007 Australia
Submission Date	25/04/2025 10:49 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

Whilst the changes to the application are an improvement on the first, I feel I cannot support the application in its current form for several reasons. There is still insufficient retention of tree, canopy, and provision of greenery. The density of living is still too high and outwith the codes for the area but more importantly are too high to support associated parking and traffic. Traffic in and out of Gibson Street and Market Place will be high and there is no provision for visitor car parking, which will make those street clogged and busy, with Gibson Street becoming potentially dangerous. With no provision for turnaround in Market Place there will be issues for rubbish trucks and deliveries. There are no social amenities designed in the plans to help social cohesion such as a gazebo area. The monolithic white facade and wall facing Hawker Street with a carpark on the corner is not a good introduction to the neighbourhood as you walk or drive in and will encourage graffiti. Whereas the existing type of brick wall is far less likely to do so plus has provision for street trees. It would make far more sense for the density to be reduced a little and for the car parking to be moved solely to the middle of the complex with access only on Market Place and retain the current wall or similar. This would break up the Hawker Street facade and also there may be a chance of incorporating some sort of gazebo or meeting area to improve the facilities for the residents.

Attached Documents

Representations

Representor 11 - Yallana Burgess

Name	Yallana Burgess
Address	131 Drayton st. BOWDEN SA, 5007 Australia
Submission Date	25/04/2025 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?	Yes
My position is	I oppose the development

Reasons
This proposal does not meet the heritage overlay rules. It is horrific over development pf the site with insufficient space for parking, the streets around this area are narrow and have heavy congestion already due to the church, school and new apartments that are only required to have a single car space. The established neighbourhood zoning rules are not met. This is poor planning without thought for existing residents, the heritage of the area or consideration of current and future traffic conditions.

Attached Documents

Representations

Representor 12 - Simon Saunders

Name	Simon Saunders
Address	Unit 2 137 Drayton St BOWDEN SA, 5007 Australia
Submission Date	26/04/2025 09:15 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 I support the development of the site but it needs to have the appropriate amount of dwellings which is 12 and to meet historic overlay rules and requirements - no tree removal and appropriate car parks	

Attached Documents

Representations

Representor 13 - Carlin Garrett

Name	Carlin Garrett
Address	18 Thirteenth Street BOWDEN SA, 5007 Australia
Submission Date	27/04/2025 09:46 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

Reasons

This development is at the end of my street so it directly affects our household. 1. Social housing complexes have been proven to have poor outcomes for residents and their neighbours. I understand it's directed at 55 year old women, however this can change and could include partners and children. I have already seen many issues with social housing in the area. There are some nice social houses with lovely residents in the area and some not so nice. It is far better to keep social housing in small numbers mixed in with private housing. Furthermore, there is already a high number of social housing in this part of Bowden, it certainly does not make sense to add any more. 2. There is not enough parking in the area as is. The area is not designed for these kind of dwellings. Every weekend there are illegally parked cars on our street as the street can get full. The Gibson Street exit onto Hawker is often very congested with a lot of cars coming in and out. This area does not need an high-density dwellings adding more congestion. 3. It appears as though the original proposal was a guise to making this amended proposal seem like a good option for being the lesser of two evils. The issues still remain. Our area is congested with narrow streets and is not designed for these dwellings. The local residents who are affected by this do not want this development here, or any similar developments. This development is still not compliant with the planning rules of the area.

Attached Documents

Representations

Representor 14 - Philip Jones

Name	Philip Jones
Address	54 Trembath st BOWDEN SA, 5007 Australia
Submission Date	28/04/2025 01:10 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 Heritage overlay rules not met Established neighbourhood zoning rules are not met. I totally oppose this development I don't believe there is enough parking There is a warped assumption that this area due to the bus on Hawker and a major rail adjacent that public transport is good.not true. Also there are constant parking by visitors to the gym pizza Cafe and city constuction and hospital workers leaving there car and getting bus. Every development should be set back from Hawker as per opposite. It is a funnel of traffic and people,very hazardous and unsafe at the moment.	

Attached Documents

Representations

Representor 17 - William Fry

Name	William Fry
Address	8 Telford st OVINGHAM SA, 5082 Australia
Submission Date	30/04/2025 06:31 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 Multi storey appartments are unacceptable for this location	

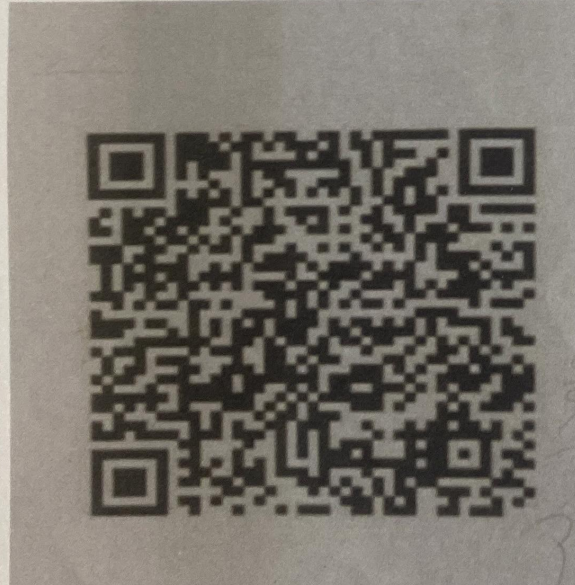
Attached Documents

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OFFICIAL

o-storey residential flat building comprising community housing dwellings (28) and supported accommodation premises (2) and demolition of buildings including one representative Building with associated car parking and landscaping.

https://plan.sa.gov.au/have_your_say/notified_developments/current_notified_developments/submission?aid=10655



ar Local Resident,

est year Uniting SA proposed a housing development which attempted to build 48 low-income accommodations in an apartment style complex in the area outlined above. This proposal went against the heritage overlay of the area, went against the neighbourhood zoning of the area, went against density requirements and removed historic buildings and trees.

early this year we had a huge win via Plan SA rejecting the proposal thanks to feedback provided by residents of Ovingham and Bowden putting in many submissions against the application.

s expected, United SA have come back with another plan (viewable via the QR code and the link provided at the top of the page). This plan, albeit a vast improvement from the original (2 stories tall, 30 units instead of 48, 8 more carparks and minor landscaping adjustments), is still in breach of the rules set out in our area:

- Heritage overlay rules are not met.
- Established neighbourhood zoning rules are not met.

To summarise, we fully support low-income accommodations, however they need to be met in accordance with the rules of the area. This site should have only 12 dwellings, meet historic overlay rules and requirements (facades and building designs) and not remove any significant trees or historic homes on the plot.

This proposal should be looked at on its own merits and not as an “improvement” on the last planning proposal. This proposal is still in breach of zoning requirements, and we ask that you please put in your say via the QR code above.

Keep in mind that whatever is approved here will set precedence for our area.

Representations

Representor 18 - Sarah Lennon

Name	Sarah Lennon
Address	113 Gibson Street BOWDEN SA, 5007 Australia
Submission Date	02/05/2025 11:52 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 Please see attached letter - 4000 characters is insufficient.	

Attached Documents

Uniting-on-Hawker-Development-24024441-1495887.pdf

2 May 2025

Sarah Lennon
113 Gibson Street
Bowden SA 5007

Presiding Member
State Commission Assessment Panel
State Planning Commission
Via the Plan SA Portal

Dear Ms Thomas & Members

Size and Scale

The size and scale far exceed what allowed for the area. The zoning would allow up to perhaps thirteen townhouses, the current 10 on the site is within this range. Allowing perfectly fine housing to sit for extended periods empty waiting for them to be ruined and saying they are unsuitable is simply lazy housing policy. The building height of the proposal is too high, the setbacks on Market Place and Hawker Street are non-existent, the proposed built form is domineering and with little architectural merit.

Historic Overlay

The proposed development is in one of the few remaining areas of Bowden with a historic conservation zoning. This development is completely at odds with the zoning for the area. The existing properties were tenanted and loved by many long-term residents until they were evicted and rehoused elsewhere. The current proposal of ugly cheap overdeveloped units does not align with the area's character or the zoning. This is hugely disappointing to those who live in vicinity and have lovingly cared for our older homes. The removal of the representative buildings is not justified by the current proposal. It is also a loss to the broader community who gain much joy from being able to walk historic neighbourhoods and find pockets of the past amongst the new development. Market Place gets pedestrian and cyclist traffic as people use it to avoid the congested Gibson Street/ Hawker Street intersection as they head towards the Gym/ City / Linear Park.

Significant Trees

The proposed development would require a significant tree to have a large reduction in its tree canopy in order to fit the second story of the unit complex. It will also see the removal of all other significant and contributory trees, and unknown long-term damage to the remaining significant tree. I write this while looking out my window at this

beautiful tree and am not the only house that gets to benefit from the canopy with many homes on Market Place and Gibson Street having bedrooms and living spaces that look at this beautiful tree. Bowden is a hot suburb with very little mature tree canopy due to the nature of the development in the area, as such, it is imperative that those that remain are cherished, for their beauty, cooling properties and I also quite appreciate the supply of oxygen to breathe. The proposed development will result in the return of very little green space and no plan for anyone to maintain the small amount proposed.

Car Parking

The development is short of the car parks required under a proposal of this size. The traffic report provided by the developer is questionable, at best - removing all the residents from the existing dwellings and then saying there are not many cars in the area and therefore you don't expect many more when you add 30 occupied units is an unhelpful way to calculate available car parking. Anyone can pay a 'consultant' to write a report that states 'nothing to see here'. Market Place after the bend in the road is only wide enough to have car parking on one side, it is proposed that much of the time there will need to be some restrictions on parking at the end of Market Place to allow for the manoeuvring of a rubbish truck. Further the recent expansion of the church on Drayton Street sees an overflow of car parking down Market Place as Drayton Street is very narrow and has limited available car parking. The suggestion to park on Gilbert Street in the next suburb over is somewhat laughable, this is another narrow street that already has poor traffic flow and is generally reduced to one way traffic due to parked cars in the area.

I wholly support social housing and am deeply saddened that the developer has found it fit to leave ten social houses empty, when so many are desperately in need. This is not a case of not in my backyard, I have lovely neighbours in social housing and use to have more across the road, but this is not the place for this development. This development needs to be assessed on its build form merit - which it is unfortunately lacking.

I implore you to reject this development - and while outside your authority - encourage the moving back of residents into these homes. A charity that asks the community for money for social housing and then moves tenants out of houses prior to even having viable plans for the site is very hypocritical of its stated ethos.

I appreciate your consideration of these concerns and hope a more appropriate solution can be found that preserve the historic character and green spaces while providing homes for those in need.

Regards

Sarah Lennon

Representations

Representor 19 - Michael Goers

Name	Michael Goers
Address	107A Gibson Street BOWDEN SA, 5007 Australia
Submission Date	03/05/2025 06:09 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

I am basing my opposition on 1) it still being outside of permitted planning guidelines based upon dwelling density. It may be less than version 1 (4+ X) but it is still too large for this area at 3X. 2) Traffic. The additional traffic from the development will still pass down Gibson Street onto Market Place and back. Both of these roads are too busy and narrow for this additional traffic. Add to this, additional street parked vehicles from the development overflow and it will increase the risk of all road users. The new proposed 6 space car park at the Gibson Street and Hawker Street intersection is worse than the original entry only for 6 cars at the original townhouses. All reasons against this on the originally proposal are still relevant but now magnified. During the demolition, site preparation and construction phases the amount of heavy traffic through Market Place and Gibson Street will significantly increase the risk to all road users in this area. It will additionally decrease the residents standard of a peaceful life in this residential area. 3) I still have a second stories apartment, number 114's balcony directly overlooks our backyard, pool, house alfresco room, kitchen and living/dining room. It is 9.06m from our yard boundary with direct line of sight. A development of this size and dwelling density is not suited to the property. It has a one access road (Market Place) with insufficient onsite parking (overflow will go onto the street parking). It is distant to shops, doctors etc with limited public transport available. Any future proposals must be compliant to the areas current dwelling density. If they are not we shall continue to oppose them. Regards Mick and Haydee Goers

Attached Documents

Representations

Representor 20 - Peter Brockbank

Name	Peter Brockbank
Address	39, Telford Street, Telford Street OVINGHAM SA, 5082 Australia
Submission Date	05/05/2025 12:37 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 proposed development is, I believe in breach of the: % Heritage Overlay Rules for the area, % The Established Neighborhood zoning rules have not been met by this proposal	

Attached Documents

Representations

Representor 21 - Phillip Brunning

Name	Phillip Brunning
Address	PBA, Level 1/27 Halifax Street ADELAIDE SA, 5000 Australia
Submission Date	05/05/2025 04:25 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
Reasons Please see attached.	

Attached Documents

Representation-by-R-Worthington-and-others-in-relation-to-Application-ID-24024441-AS-AMENDED-1496592.pdf



Town Planning
Development Advice
Strategic Management

5 May 2025

Presiding Member
State Commission Assessment Panel
State Planning Commission
Via the Plan SA Portal

Attention: Joanne Reid - Planning & Land Use Services

Dear Ms Thomas & Members,

REPRESENTATION IN RELATION TO DEVELOPMENT APPLICATION 24024441 - AS AMENDED

I refer the abovementioned Development Application (as amended) that seeks planning consent to demolish existing buildings including a representative building and the construction of a two-storey residential complex comprising 30 dwellings (previously 48) on land at 105 Gibson Street & 12 Market Place, Bowden.

As you will recall, I made a representation on behalf of Mr Rod Worthington and others by letter of 8 October 2024 (copy attached) in relation to this development application outlining serious town planning concerns with respect to building form, bulk, scale, siting, intensity, parking, character and amenity.

It is first appropriate to acknowledge that amendments made do go some way to addressing the concerns previously expressed on behalf of my clients. That said, my clients continue to hold concern with respect to certain matters that I outline below for your consideration in determining this application.

1. Loss of Representative Building

The loss of a representative building continues to be regrettable, particularly as the Planning & Design Code seeks to retain existing buildings that display historic characteristics as expressed in the Historic Area Statement. The case for demolition has not to my mind been justified with reference to relevant Performance Outcomes.

2. Density & Over Development

The proposed development continues to be an over development of the land, resulting a dwelling density approaching 3 times that otherwise provided for by the Code in this location. The Code on my reading does not afford such a reduction or 'uplift' with respect to dwelling density even if for social or community housing.

Even if the Affordable Housing incentives were to be applied (generally not applicable within the Historic Area Overlay) this may only afford a 20% reduction in the relevant density measure (275 m²) resulting in a maximum number of 13 dwellings for this land parcel that has an area of 2950 m².

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3. Building Height & Siting

While the proposal has been reduced by one level, the buildings proposed continue to exceed the relevant measure of 6 m and 1 level identified by the Planning & Design Code for this location. The prevailing character of this locality is clearly single storey, with the proposal presenting as an anomaly in this regard.

In combination with a siting position too close to existing residential development (a 3 m set back) the proposed two storey built form will compromise the otherwise open and spacious siting of the adjoining dwelling at 107 Gibson Street. I also note the less than desirable 'walk up' stair arrangement to the rear of Apartments 115, 116 & 117.

The presentation to Hawker Street also leaves much to be desired, with minimal if any space for landscaping that may go some way to softening the building form as it presents to the public realm. This is compounded by the nominal footpath width on Hawker Street this location and lack of space for street trees.

I also question the appropriateness of providing an open lot car park at the corner of Hawker Street with Gibson Street in a manner that is most uncharacteristic of the historic pattern and form of development in this locality. This arrangement does not enhance the residential character of this streetscape.

The appropriateness of placing a bin enclosure in this location is also questionable.

4. Tree Removal & Lack of Landscaping

The extent of removal of existing mature trees from the land is lamentable (and not supported by expert arboriculture advice provided) particularly as limited space is to be provided for meaningful tree replacement to soften the interface between proposed over height development with the rear yards of existing dwellings.

5. Driveway Access, Traffic & Parking

In addition to the questionable streetscape character outcome arising from the location of an open lot car parking at the corner of Hawker Street with Gibson Street, I suggest that the position of the access driveway fails to provide adequate safe sight distance, as acknowledged by the Applicant's own expert traffic advice.

The Applicant has sought to rationalise this less than satisfactory outcome by presenting what I consider to be somewhat understated expected traffic movements along this driveway (1 ingress and 2 egress during the AM peak hour and 2 ingress and 0 egress in the PM peak hour).

Caution should be applied in countenancing this arrangement given the proximity to an intersection which is often congested in the afternoon as a result of freight trains holding up traffic along Hawker Street for considerable periods of time. At other times, my experience is that the speed of travel is often in excess of 40 km/h.

While the ratio of car parking to dwellings has been improved by the recent amendments to this proposal, the proposal is still short by 3 spaces. While this shortfall may be considered minor in isolation, it is yet another indicator or symptom of over development arising from this proposal.

In conclusion, I reaffirm my clients' objection to this development notwithstanding the amendment made. It continues to be an over development of the land that manifests itself in many undesirable ways. It is my submission that the cumulative effect of these features from clearly express planning policy should be carefully considered.

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

Yours faithfully

PHILLIP BRUNNING & ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to be 'P. Brunning', with a long vertical line extending downwards from the end of the signature.

PHILLIP BRUNNING RPIA

Registered Planner

Accredited Professional – Planning Level 1

8 October 2024

Presiding Member
State Commission Assessment Panel
State Planning Commission
Via the Plan SA Portal



Town Planning
Development Advice
Strategic Management

Attention: Joanne Reid - Planning & Land Use Services

Dear Ms Thomas & Members,

REPRESENTATION IN RELATION TO DEVELOPMENT APPLICATION 24024441

I refer to the abovementioned Development Application by Uniting SA Ltd that seeks planning consent to demolish existing buildings including a representative building and the construction of a residential complex comprising a three storey residential flat building comprising 42 dwellings and 6 two storey group dwelling on land at Bowden.

I make the following representation in relation to this development on behalf of:

- Rod Worthington, 128 Gibson Street, Bowden
- Cheryl Jaeschke, 16 Quin Street, Bowden
- Michael Smiljanic 16 Quin Street, Bowden
- Alex Pritchard, 10 Quin Street, Bowden
- Jo Mignone, 10 Quin Street, Bowden
- Rosalind Hannaford, 134 Gibson Street, Bowden
- Jim Moutos, 2A-D Market Place, Bowden
- Sarah Lennon, 113 Gibson Street, Bowden
- Mike Lennon, 17A Trembath Street, Bowden
- Jeanette Lennon, 17A Trembath Street, Bowden
- Bethany Loates, 109 Drayton Street, Bowden
- Luke Urban, 107B Gibson Street, Bowden
- Mick Goers, 107A Gibson Street, Bowden
- Helen Sutherland, 130 Gibson Street, Bowden
- Alireza Vessali, 27 Gilbert Street, Ovingham
- Mike Neindorf, 24 Gilbert Street, Ovingham
- Sandy Ball, 106 Drayton Street, Bowden
- Paul Acfield, 106 Drayton Street, Bowden

1. Introduction

For reasons I discuss more particularly below, this development application should be declined consent. The proposal in its current form is an *over development* of the land that would have an adverse impact on the character and amenity of the locality. The departure from the Planning & Design Code is too great in the circumstance.

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In making this representation, I acknowledge the bona fides of the Applicant with respect to the important work they do in the provision of housing and services to the community. In this instance however the quantum of development is beyond the capacity of the site and surrounding locality.

This is not to say that a development of a more appropriate scale and intensity may not be appropriate on this land. One which is respectful of the amenity presently enjoyed by existing residents that live adjoining and nearby, and one which is compatible with the existing pattern of development and built form character.

As noble as the community housing outcome sought may be, this should not come at a disproportionate cost to those that currently reside in this area. If development of this nature is to be successfully pursued, it should adopt a more contextual approach and one which is respectful of and responsive to its setting

2. Context

In terms of the setting, the land which is the subject of this development is comprised of multiple allotments that are each developed with one or in a few instances two dwellings. The built form character of this locality is predominantly one, with some more recent two storey 'townhouse' development.



Other notable characteristics of the locality include the commercial properties on the southern side of Hawker Street, the rail corridor, the grid pattern of local streets, established trees including a number of mature eucalypts, and various historic buildings from the late 19th and early 20th century.

This locality has a distinctly inner urban residential neighbourhood character reflective of the historical pattern and form of development, with more recent infill development primarily in a town house format. This locality is not characterised by multi-level residential flat development.

I understand that the dwellings proposed for demolition are currently or until recently been used for social housing. The single storey dwellings fronting Market Place are provided with rear access for vehicle parking, with buildings well set back from rear boundaries. A more notable mature eucalypt is evident in this shared rear yard area.

3. Proposal

The proposal seeks approval for:

- demolition of existing buildings including one 'representative' building;
- a three storey residential flat building fronting Hawker Street comprising 23 dwellings to be used for 'community' housing (shared parking);
- a three storey residential building fronting Market Place comprising 19 dwellings for community housing and supported accommodation (shared parking);
- 6 two storey 'town house' style dwellings fronting Hawker Street in an attached format (no private garaging);
- an arrangement of shared driveways and parking spaces (6 spaces associate with the townhouses and 20 spaces for use by the other dwellings); and
- retention of the large eucalypt (a significant tree), fencing, landscaping including that for a 'Zen Garden'.

4. Planning & Design Code

The land is located within the Established Neighbourhood Zone.

The following policy Overlays apply:

- Airport Building Heights (Regulated) (*All structures over 45 metres*)
- Building Near Airfields
- Historic Area (*ChSt2*)
- Prescribed Wells Area
- Regulated and Significant Tree
- Stormwater Management
- Traffic Generating Development
- Urban Tree Canopy

The following Technical Numerical Variations (TNV) apply.

- Maximum Building Height (Metres) (*Maximum building height is 6m*)
- Minimum Frontage (*Minimum frontage for a detached dwelling is 10m; semi-detached dwelling is 7m; row dwelling is 6m; group dwelling is 18m; residential flat building is 18m*)
- Minimum Site Area (*Minimum site area for a detached dwelling is 250 sqm; semi-detached dwelling is 250 sqm; row dwelling is 190 sqm; group dwelling is 275 sqm; residential flat building is 275 sqm*)
- Maximum Building Height (Levels) (*Maximum building height is 1 level*)

Various General Development policies apply including that under the headings:

- Design
- Design in Urban Areas
- Housing Renewal
- Transport, Access & Parking
- Waste Treatment & Management Facilities

5. Assessment Considerations

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

5.1 Nature of Housing

On my review, there is some inconsistency between the manner in which dwellings within the residential flat buildings are described, with the proposal plans referring to *affordable housing* whereas the planning report uses the term *community housing*.

In the absence of specific agreement, the proposal may not be described as *affordable housing* in the meaning of such provided by the Planning & Design Code, with no specific meaning provided for social or community housing.

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.

The planning report indicates that two of the houses within the three level residential flat building fronting Market Place will be used for supported accommodation, presumably according to the meaning provided by the Code.

Supported accommodation

Means premises in which residential accommodation is provided to persons requiring/together with regular medical and/or personal care assistance, but does not include home care.

Little if any detail is provided by the application with respect to the manner in which this supported accommodation is to be managed, including provision for carees that may be required to attend during the day and on occasion, a stay overnight.

In my experience, these dwellings are not in a form that may be used for Specialist Disability Accommodation (SDA) housing as suggested on the proposal plans, with a requirement for individual ensuite bathrooms.

5.2 Dwelling Density

With respect to dwelling density, the Established Neighbourhood Zone seeks.

PO 2.1 Allotments/sites for residential purposes are of suitable size and dimension to accommodate the anticipated dwelling form and are compatible with the prevailing development pattern in the locality.

The associated DPF provides that

PO 2.1 Allotments/sites for residential purposes accord with the following:

- a) site areas (or allotment areas in the case of land division) are not less than the following (average site area per dwelling, including common areas, applies for group dwellings or dwellings within a residential flat building):

Minimum Site Area
Minimum site area for a detached dwelling is 250 sqm; semi-detached dwelling is 250 sqm; row dwelling is 190 sqm; group dwelling is 275 sqm; residential flat building is 275 sqm

This measure is consistent with the TNV identified for this location.

In so far as all of the dwellings proposed would fall within the meaning of a *residential flat building*, the minimum allotment/site size of 275 m² applies. The townhouses to Hawker Street are not considered to be detached, semi-detached or row dwellings.

Residential flat building	Means a single building in which there are 2 or more dwellings.
Detached dwelling	Means a detached building comprising 1 dwelling on its own site and has a frontage to a public road, or to a road proposed in a plan of land division that is the subject of a current development authorisation
Row dwelling	Means a dwelling: <ol style="list-style-type: none"> a) occupying its own site and has a frontage to a public road, or to a road proposed in a plan of land division that is the subject of a current development authorisation; and b) comprising 1 of 3 or more dwellings erected side by side, joined together and forming, by themselves, a single building.
Semi-detached dwelling	Means a dwelling: <ol style="list-style-type: none"> a) occupying its own site and has a frontage to a public road or to a road proposed in a plan of land division that is the subject of a current planning authorisation; and b) comprising 1 of 2 dwellings erected side by side, joined together and forming, by themselves, a single building.
Group dwelling	Means 1 of a group of 2 or more <u>detached buildings</u> , each of which is used as a dwelling and 1 or more of which has a site without a frontage to a public road or to a road proposed in a plan of land division that is the subject of a current development authorisation.

I say this in so far as the dwellings don't enjoy their own site and are not detached.

On the basis that this land has a total area of some 2,950 m², the expectant density outcome would be 11 dwellings (rounded up) whereas the proposal seeks 48 dwellings. This represents an exceedance of the measure by nearly 4 ½ times.

I would describe the proposal as being *medium*, not *low density*.

Acknowledging that General Development Policies in relation to Housing Renewal are relevant in the assessment of this proposal given the accreditation of the Applicant for the provision for community housing, these can only be read so far.

On my reading of these provisions, medium density housing ought to be located in close proximity to public transport, opens pace and /or activity centres. I would not describe this location as being close '*in close proximity*' to any of these.

Housing Renewal

PO 1.2 Medium-density housing options or higher are located in close proximity to public transit, open space and/or activity centres.

I am also mindful that the Desired Outcome for Housing Renewal seeks.

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.

While the quantitative measure for density provided by the Code is not mandatory in nature, the planning authority may not ignore the extent of departure and needs to be cognisant with respect to the manner in which this exceedance manifests itself.

The planning authority should also be mindful that the Rules of Interpretation for the Code provide that policy provisions for the Overlay and the Zone will prevail over General Development Policy.

I also note that this is not a location where housing renewal at higher densities than which otherwise prevail is provided for more specifically, as is the case in the Housing Diversity Neighbourhood Zone for example.

While I accept that the Housing Renewal provisions have some work to do, they should not be applied *carte blanche* and need to be tempered in their application with appropriate regard to the pattern and form of existing development in the area.

5.3 Pattern of Development & Historic Character

In addition to allotment size or site area, it is appropriate to consider whether the proposal is suitably compatible with the predominant pattern of development and streetscape character of the neighbourhood.

Established Neighbourhood Zone

DO 1 A neighbourhood that includes a range of housing types, with new buildings sympathetic to the predominant built form character and development patterns.

DO 2 Maintain the predominant streetscape character, having regard to key features such as roadside plantings, footpaths, front yards, and space between crossovers.

As noted above, pattern of development and the manner in which dwellings are accommodated on their own allotments with frontage to the public road is a key attribute of this locality and the suburb more generally.

What is proposed is very much different than this in so far as it introduces a pattern of development that is not characterized by individual buildings on their own allotments or site, but rather an aggregation of dwellings into a single form.

This land is also located within area subject to the Historic Area Overlay, the provisions for which amplify the call for development which is sympathetic with patterns of land division, site configuration and streetscapes.

Historic Area Overlay

- DO 1 Historic themes and characteristics are reinforced through conservation and contextually responsive development, design and adaptive reuse that responds to existing coherent patterns of land division, site configuration, streetscapes, building siting and built scale, form and features as exhibited in the Historic Area and expressed in the Historic Area Statement.

While I can see that an attempt has been made to reflect dwelling frontages in manner that is reminiscent with the historic pattern of development in this area, this is undone by the excessive bulk and scale of the buildings in their context.

The Code is very clear in its call for **contextual** development.

- PO 2.1 The form and scale of new buildings and structures that are visible from the public realm are consistent with the prevailing historic characteristics of the historic area.
- PO 2.2 Development is consistent with the prevailing building and wall heights in the historic area.
- PO 2.3 Design and architectural detailing of street-facing buildings (including but not limited to roof pitch and form, openings, chimneys and verandahs) complement the prevailing characteristics in the historic area.
- PO 2.4 Development is consistent with the prevailing front and side boundary setback pattern in the historic area.
- PO 2.5 Materials are either consistent with or complement those within the historic area.

Again, while an attempt has been made to reflect some of the prevailing design elements and attributes of buildings within the locality, the application falls short of meeting these provisions given the form and scale of the buildings proposed.

This is not a locality characterised by larger scale residential complexes comprised of three storey residential flat buildings. The prevailing character of this area is derived from one and two level buildings in a detached, semi-detached or row configuration.

This is clarified more specifically by the Ovingham Historic Area Statement.

Architectural styles, detailing and built form features	Single storey, detached and attached, single and double fronted workers' cottages. Bungalows and Austerity houses. Some early SA Housing Trust stock. Typically gable and hipped roofs facing the street, with separate verandah form. Generous roof planes and eaves overhangs to bungalows. Low wide bungalow style overhang verandah or gable.
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5.4 Height, Set Backs & Site Coverage

The Code seeks the following with respect to building height.

Established Neighbourhood Zone

- PO 4.1 Buildings contribute to the prevailing character of the neighbourhood and complements the height of nearby buildings.

DPF 4.1 Building height (excluding garages, carports and outbuildings) is no greater than:

a) the following:

Maximum Building Height (Metres)
Maximum building height is 6m
Maximum Building Height (Levels)
Maximum building height is 1 level

The proposed development will be up to 3 levels and 11.5 metres in height.

Historic Area Overlay

PO 2.1 The form and scale of new buildings and structures that are visible from the public realm are consistent with the prevailing historic characteristics of the historic area.

PO 2.2 Development is consistent with the prevailing building and wall heights in the historic area.

I specifically note that these provisions for the Historic Area Overlay, which prevail over that for the Established Neighbourhood Zone seek a *consistent* approach to building height. That which is proposed is far from consistent.

This is clarified more specifically by the Ovingham Historic Area Statement.

Building height Single storey with ceiling heights at least 3m.

The proposal plainly, if not grossly exceeds the maximum building height otherwise provided for in this area. This extent of departure is reason enough in my view to decline planning consent.

Acknowledging that front building setbacks in this locality are varied, the Code seeks.

PO 5.1 Buildings are set back from primary street boundaries consistent with the existing streetscape.

Whereas nominal set backs are proposed by this design to front property boundaries (which may be considered acceptable for lower scale development) buildings of 2 and 3 levels so close the street will be inconsistent with streetscape character.

Similarly, side set backs are less than that which are evident in this locality.

PO 8.1 Buildings are set back from side boundaries to provide:

- a) separation between buildings in a way that complements the established character of the locality
- b) access to natural light and ventilation for neighbours.

In the main, the siting arrangement of existing dwellings in this locality provide for side set backs that enable space between buildings and therefore opportunity for the entry of natural light and ventilation into habitable rooms.

The proposed development would introduce long continuous front facades that would not complement this existing character, with a greater reliance on artificial light and mechanical ventilation to habitable rooms.

With respect to set back to rear property boundaries, the Code seeks.

PO 9.1 Buildings are set back from rear boundaries to provide:

- a) separation between buildings in a way that complements the established character of the locality
- b) access to natural light and ventilation for neighbours
- c) private open space
- d) space for landscaping and vegetation.

The associated DPF calls for buildings to be set back 4 metres for the first building levels and 6 metres for any second building level. The proposal at its closest point will result in a three storey wall within 3.89 metres of a rear boundary.

Even the rear facing balconies associated with the two storey townhouses fronting Hawker Street are only set back by 3.78 metres from the shared boundary with the adjoining single storey detached dwelling to the north.

This theme of space around buildings is reinforced by the following provisions.

PO 3.1 Building footprints are consistent with the character and pattern of the neighbourhood and provide sufficient space around buildings to limit visual impact, provide an attractive outlook and access to light and ventilation.

DPF 3.1 Development does not result in site coverage exceeding:

In instances where:

- a) no value is returned (i.e. there is a blank field), then a maximum 50% site coverage applies

Rather unhelpfully, the proposal plans do not provide a site coverage calculation.

5.5 Privacy & Shadowing

In so far as the amenity enjoyed by residents in this area is derived not only from built form character and space around building, it is appropriate to consider privacy and also access to sunlight during winter months.

With respect to privacy the Code seeks.

PO 10.1 Development mitigates direct overlooking from upper level windows to habitable rooms and private open spaces of adjoining residential uses

DPF 10.1 Upper level windows facing side or rear boundaries shared with a residential allotment/site satisfy one of the following:

- a) are permanently obscured to a height of 1.5m above finished floor level and are fixed or not capable of being opened more than 200mm
- b) have sill heights greater than or equal to 1.5m above finished floor level
- c) 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
- d) 1.5 m above the finished floor level.

PO 10.2 Development mitigates direct overlooking from balconies, terraces and decks to habitable rooms and private open space of adjoining residential uses.

DPF 10.2 One of the following is satisfied:

- a) 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, or

- b) 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:
- c) 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
- d) 1.7m above finished floor level in all other cases

While an attempt has been made to provide screening to limit the potential for overlooking into the rear yard area of adjoining residents, this has necessitated rather oppressive measures that will impact the amenity enjoyed by future residents.

Even with frosted glass to 1.5 metres above finished floor levels and screening of a similar height to balconies, I expect that there will be occasion where the privacy of existing residents will be impinged.

This will be most profound from the north facing balconies of the townhouses which will look not the rear yard area of the adjoining dwelling separated by a distance of only 3.78 metres, whereas the Code seeks at least 15 metres.

PO 3.2 Overshadowing of the primary area of private open space or communal open space of adjacent residential land uses in:

- a) a neighbourhood type zone is minimised to maintain access to direct winter sunlight
- b) other zones is managed to enable access to direct winter sunlight.

DPF 3.2 Development maintains 2 hours of direct sunlight between 9.00 am and 3.00 pm on 21 June to adjacent residential land uses in a neighbourhood-type zone in accordance with the following:

- a) for ground level private open space, the smaller of the following:
 - i. half the existing ground level open space or
 - ii. 35m² of the existing ground level open space (with at least one of the area's dimensions measuring 2.5m)
- b) for ground level communal open space, at least half of the existing ground level open space.

With reference to the shadow diagrams provided, the proposal will not reduce the extent of sunlight that adjoining residents may continue to enjoy during the specified hours in Winter.

5.6 Traffic, Access & Parking

While I am not an expert in traffic engineering, I raise the following matters for your consideration with reference to key provisions of the Code that relate to traffic, access and car parking.

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.

I question whether sufficient separation is provided between the proposed driveway from Gibson Street relative to the junction with Hawker Street and the ability to provide suitable safe sight distance.

I also query the appropriateness of a one way driveway arrangement for these townhouses of a nominal width. In my experience one-way driveways of this nature are rarely observed, and that vehicle conflict invariably occurs.

PO 3.4 Access points are sited and designed to minimise any adverse impacts on neighbouring properties.

PO 6.2 Vehicle parking areas are appropriately located, designed and constructed to minimise impacts on adjacent sensitive receivers through measures such as ensuring they are attractively developed and landscaped, screen fenced, and the like.

The positing of driveways and parking areas adjacent the side and rear boundaries of existing residents will have a profound impact on the amenity that may continue to be enjoyed, in terms of the coming and going of vehicles during the day and night.

Nominal landscaping is proposed to be undertaken at the boundary interface.

PO 3.8 Driveways, access points, access tracks and parking areas are designed and constructed to allow adequate movement and manoeuvrability having regard to the types of vehicles that are reasonably anticipated.

Provisions is not made on site for a waste collection vehicle to perform its function.

PO 4.1 Development is sited and designed to provide safe, dignified and convenient access for people with a disability.

I fail to see parking specifically for persons with a disability, noting that this development includes SDA housing. I would have expected at least one parking spaces be provided for this purpose.

PO 5.1 Sufficient on-site vehicle parking and specifically marked accessible car parking places are provided to meet the needs of the development or land use having regard to factors that may support a reduced on-site rate such as:

- a) availability of on-street car parking
- b) shared use of other parking areas
- c) in relation to a mixed-use development, where the hours of operation of commercial activities complement the residential use of the site, the provision of vehicle parking may be shared
- d) the adaptive reuse of a State or Local Heritage Place.

On my assessment, the proposed development ought to be provided with 64 parking spaces if the rates provided at Table 1 – General Off-Street Car Parking Requirements are to be met, i.e.:

- Apartments (2 beds) 42 x 1 space + 0.33 visitor spaces = 55.86 spaces
- Town Houses (2 beds) 6 x 1 space + 0.33 visitor spaces = 7.98 spaces

The proposal provides for 26 spaces, equivalent to only 41% of the requirement.

The Applicants. Traffic Engineer has sought to justify that a lesser provision is acceptable in the circumstance given on-street parking opportunities in the locality, access to public transport and public housing considerations.

Even with the discounted visitor parking rate of 0.25 spaces per dwelling, the shortfall would be 33 spaces for the apartments. Together with the short fall of 2 spaces for the townhouses, the overall departure would be 35 spaces.

This location is not in close proximity to a high frequency public transit system (400 metres) and experiences high levels of competition for on street parking given many dwellings historically have not been provided with on-site parking.

In my view, the proposal is significantly under parked.

I also draw your attention to the review undertaken by Andy Hayes of Phil Weaver & Associates, experienced and highly regarded Traffic Engineers that deals with traffic, parking, waste management and safety considerations in greater detail with reference to Code policy and the relevant Australian Standard.

In particular, I note:

- at best, the shortfall of parking on site is equivalent to 24 spaces;
- inadequate assessment has been undertaken with respect to the Gibson Street and Hawker Street intersection;
- the site access point on Gibson Street would be located only 3 metres away from the relevant kerb tangent points with the intersection with Hawker Street;
- further consideration is required to be given in relation to the provision of suitable safe sight distance for drivers;
- the swept paths required for a waste collection vehicle to undertake on street collection are not considered safe or convenient;
- the proposal does not provide sufficient on site bike parking which would only exacerbate the considerable parking shortfall;
- the design of the parking area associated the proposed townhouses to Hawker Street and its one way arrangement presents a risk to pedestrians; and
- the design of parking spaces for the proposed apartments has many deficiencies that will compromise its safe and efficient use.

5.7 Regulated & Significant Trees

In so far as the proposal plans do indicate the presence of a regulated tree on the land that is to be retained as part of this development, a report from a consulting arborist with respect to the health of this tree initially during construction and thereafter has not been provided by the Applicant.

This has necessitated my clients engaging Lawrence Skipworth-Michell of LSM Tree Advice to provide a review. It is first apparent when reading this review that the Applicant has failed to identify all trees that are either regulated or significant on this and adjoining land, and the extent of proposed removal. This is most disappointing.

The planning report provided by Future Urban has therefore not adequately assessed the proposal according to relevant Code policy. I also query the reference made by Future Urban to advice provided by Arborman Tree Solutions in relation to a 'previous version' of the proposal which included greater parking areas beneath the tree canopy.

If this previous advice is to be relied upon, I should be produced.

6. Conclusion

I am of the view that the proposal departs too far from clearly expressed planning policies that seek compatibility with the prevailing pattern and form of existing development, and as a consequence will compromise the character and amenity of this locality.

More particularly, the proposed development will:

- result in building height that is not only 3 times that otherwise provided for in this location, but is very much inconsistent with and uncharacteristic of the prevailing pattern and form of development sought for this heritage area;
- result in a density that is 4½ times greater than that provided for in this location;
- the scale and intensity of the proposed development will have a profound impact on not only the built form character of this locality, but the amenity that adjoining and nearby residents may reasonably expect to enjoy in this context;
- buildings are sited too close to property boundaries given their height, with insufficient space for landscape screening to ameliorate the adverse effects of building bulk and scale;
- notwithstanding efforts made, the proposal will invariably result in a loss of privacy for neighbouring residents given the opportunity for light of site from upper level winds and balconies;
- the proposal is grossly under parked which will result in disproportionate pressure being placed on limited on street parking opportunities in the locality that struggle to satisfy current demand arising;
- driveways along side existing residential properties is a poor outcome that will lead to disturbance, with the proposed one way arrangement for the town houses to Hawer Street a recipe for disaster; and
- result in an over development of the land far beyond that which is provided for.

As provided for, I seek the opportunity to appear before the Panel to speak further to the above and respond to any questions arising. Can you please confirm the date and time of this meeting. Thank you.

Yours faithfully

PHILLIP BRUNNING & ASSOCIATES PTY LTD



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4 October 2024

Mr Alex Pritchard
Design Director
Galvin GroupBy email: info@galvingroup.com.au

Dear Alex,

**PROPOSED RESIDENTIAL DEVELOPMENT – 2-18 MARKET PLACE & 105 GILBERT STREET, BOWDEN (24024441)
– TRAFFIC AND PARKING REVIEW**

We refer to our recent discussions with respect to the proposed residential development on the above site. As requested, we have undertaken the following review of the traffic, access, and parking related aspects of the proposed development.

In undertaking this assessment we have considered the following documentation associated with the proposed development, as provided to our office:

- 'Architectural Plans' prepared by City Collective, dated July 2024,
- A 'Traffic and Parking Report' prepared by Cirqa (Project No. 24262), Version 1.1, dated 5 August 2024,
- A 'Waste Management Plan' prepared by Rawtec, Version 1.1 dated 26 July 2024, and
- A 'Planning Letter' prepared by Future Urban, dated 6 August 2024.

TRAFFIC AND PARKING REVIEW

The following concerns have been identified in relation to the proposed development:

1) Adequacy of Car Parking

There is a two-space off-street car parking shortfall associated with the proposed six-dwelling 'townhouse' component of the subject development (visitor parking). This was justified within the 'Traffic and Parking Report' on the basis of a high-level review of available on-street parking identified in historic aerial imagery. This imagery was not provided and it is not apparent if it included typical periods of peak residential visitor parking demand, namely evenings and weekends.

Nevertheless, it is noted that No Stopping Anytime restrictions apply directly adjacent to the subject section of land on both Hawker Street and Gibson Street. As such, justification of visitor parking associated with the proposed townhouses occurring on-street would need to occur entirely adjacent to neighbouring properties, which is considered inappropriate given the potential impact on amenity of the existing residents.

There is also a significant 33-space off-street car parking shortfall associated with the proposed 42-dwelling 'apartment' component of the proposed development.

Given the secured nature of the subject on-site car parking area and more particularly the on-street car parking available on Thirteenth Street and Market Place directly adjacent to the subject site, there is a reasonable argument that the 11 visitor spaces associated with this land use component could be accommodated on-street directly adjacent to the subject site.

However, only 20 resident car parking spaces would be provided on-site, i.e., fewer than one space for every two apartments. The 22-space shortfall for this component was justified in the 'Traffic and Parking Report' and 'Planning Letter' on the basis of:

- a *Planning and Design Code Overlay* which is not relevant to the subject land,
- high-frequency public transport (train stop) which is not within sufficient proximity (<400m) to the subject site,
- an adjoining bus corridor on Hawker Street which is only 'standard frequency' and not 'high frequency' as suggested, and
- anecdotal suggestions of the operator requirements.

It is considered that this shortfall associated with resident car parking is severe, and unjustified.

Even on the basis that the 11 visitor car parking spaces associated with the apartment land use could be accommodated on-street, there would still remain a significant and inappropriate 24-space on-site car parking shortfall associated with both visitor parking for the townhouse component and resident parking for the apartment component.

In summary it is considered that the car parking provision associated with the subject development is insufficient and does not reflect the requirements of the *Planning and Design Code* for the proposed development location.

2) Impact on Hawker Street / Gibson Street Intersection

The 'Traffic and Parking Report' forecasts that the proposed development would generate up to 26 peak hour vehicle trips. Such volumes (between 10 and 100 peak hour vehicle trips) would constitute a 'moderate impact' traffic generating development in accordance with the relevant Austroads Guide to Traffic Management (Part 12).

In relation to traffic generation and distribution the 'Traffic and Parking Report' states that: "*Such a level of traffic generation would be readily accommodated at the proposed access points and on the adjacent road network, with minimal impact upon its operation.*"

Based on the geometry of the adjoining road network, it is anticipated that the majority of these traffic movements would access the site via the intersection of Gibson Street with Hawker Street. It is noted that Hawker Street is a distributor road carrying of the order of 5,600 vehicles per day (vpd), and there are no right turn treatments on Hawker Street on approach to either side road at this stop-controlled four-way intersection.

It is therefore considered that the above summation from the 'Traffic and Parking Report' is unsubstantiated. Further assessment of the impact of the proposed development on the intersection of Gibson Street with Hawker Street is considered warranted. For example, the City of Charles Sturt Local Area Traffic Management Plan from 2009 identifies investigation of a roundabout treatment at the intersection of Gibson Street with Hawker Street intersection as a 'medium-term' recommendation, the need for which the proposed 'moderate impact' traffic generating development may trigger.

3) Proposed Gibson Street Access Point

The proposed site access point on Gibson Street would be located only 3m from the relevant kerb tangent point associated with the nearby intersection of Gibson Street with Hawker Street. i.e., in a 'prohibited location' within 6m of the tangent point as identified by *Figure 3.1* of *AS/NZS 2890.1:2004*.

The 'Traffic and Parking Report' states that this is an improved access arrangement in comparison to existing conditions. However this arrangement remains contrary to the relevant Australian Standard, and in particular given consideration to the distributor-road nature of the nearby Hawker Street, is not considered safe.

Furthermore, the proposed access point would include removal of an existing street tree, which has not been acknowledged in either the 'Planning Letter' or 'Traffic and Parking Report'.

4) Built Form Impact on Sight Distances

The proposed development would incorporate minimal built form offsets from the site boundaries which will impact upon sight distances for exiting vehicles. Together with the narrow verge width along Hawker Street and traffic volumes on this roadway, the impact of the proposed development on the following sight distances warrants further consideration and potentially increased setbacks in order to accommodate:

- Safe Intersection Sight Distance (SISD) at the intersection of Gibson Street with Hawker Street, for a driver queueing to enter Hawker Street from Gibson Street, looking to the south-east past the proposed townhouses, and
- Appropriate sight distance at the proposed Hawker Street site exit point, in both directions past both the townhouses and apartments, respectively.

5) Waste Collection

Waste collection for a development of this scale should be undertaken on-site (*P.O. 40.6* of the *Design in Urban Areas Overlay*), not on-street as proposed. It has not been justified why on-site waste collection would not be feasible on such a 2,950m² allotment.

The waste collection vehicle swept path identified in the 'Traffic and Parking Report' relies on vehicle overlap of the public footpath. This movement is not considered safe or convenient.

The waste collection vehicle turnaround movement on Market Place also relies on temporary on-street parking restrictions. The proposed timing and nature of these restrictions have not been made clear, or justified in terms of the reliance the proposed development would have on on-street parking.

The proposed bin presentation area on Gibson Street identified in the 'Waste Management Plan' for three dwellings is considered to be too close to the intersection of Gibson Street with Hawker Street, and it is questionable whether sufficient space for six bins associated with three dwellings could be accommodated in the identified section of the road verge.

There may also be insufficient width within the Hawker Street verge adjacent to the subject site for pedestrians, including wheelchair users, to travel along the public footpath in the event that bins associated with the proposed development are presented to this roadway in the manner identified in the 'Waste Management Plan'.

6) Bicycle Parking

The 'Traffic and Parking Report' identifies that 22 bicycle parking spaces will be provided on-site, while the 'Architectural Plans' indicate 33 vertical spaces within a ground-floor storage room. In either event, there would be a shortfall below the minimum 42-space requirement identified within the 'Traffic and Parking Report'.

In relation to the apartment bicycle parking, the 'Traffic and Parking Report' states that: *"The proposal will provide 22 bicycle parking spaces, which, although will not satisfy DTS/DPF 14.5, is regarded as being sufficient to accommodate the needs of the residents of the development (noting that, based on advice from Uniting SA, the resident cohort will typically comprise women aged 55 and over) and would satisfy PO 14.5."*

Notwithstanding that the resident cohort may change over time, it is not clear why a lesser rate would be appropriate for the aforementioned resident cohort.

Noting the on-site car parking shortfall also proposed, the on-site bicycle parking shortfall may further exacerbate parking concerns.

Based on the design of the bicycle parking spaces identified on the 'Architectural Plans', it is noted that some spaces intrude on the parking envelope and aisle width requirements of adjacent spaces as per AS 2890.3:2015 dimensional requirements. Additionally, this standard identifies that at least 20% of on-site bicycle parking shall be horizontal, which does not appear to have been allowed for.

7) Townhouse Parking Area Design

The proposed driveway inappropriately narrows to approximately 2.7m (less than the minimum 3m) in width within the first 1.0m into the site from the proposed Gibson Street access point.

The 3.0m wide driveway is reliant on the adjoining paved area being free from obstructions for at least 0.3m from the edge of the driveway. The indicative rainwater tank designs should be confirmed to be outside of these areas, while also accommodating the bin storage as shown in the 'Waste Management Plan'.

There would be risks to pedestrians when stepping out from the rear of the townhouses into the adjoining driveway aisle due to the adjoining wall protrusions which would limit sight lines to oncoming vehicles from the north-west. This would occur when occupants are walking towards their cars or accessing their bin storage area. It is not clear if this area would be delineated from the driveway, but in any event this footpath is considered to be insufficient in width noting residents will be required to use this area to transport bins between the storage area and kerbside bin presentation areas.

Due to drawing lineweight's, it is not clear if the north-westernmost car parking space will maintain sufficient width adjacent to the site boundary. Similarly, it is not clear if canopy columns are achievable in this location. Additional details of the proposed canopy need to be provided.

There is no indication of proposed signage, such as 'No Entry' (R2-4) signage at the proposed site exit point, to clearly identify to oncoming traffic the directional flow of the proposed one-way access point.

Furthermore, entirely parallel car parking, in an unsecured area, and potentially uncovered (subject to canopy details) combines for a poor design outcome for future residents, that should be reconsidered.

8) Apartment Parking Area Design

The proposed fire stair does not provide the minimum 0.3m clearance required to the adjoining driveway aisle (no clearance provided). Based on scaling of the plans, there also appears to be less than the minimum 0.3m clearance from these fire stairs to the adjoining car parking space #13.

The roller door controlling access to this car parking area has an opening less than the minimum 6.1m required for two-way access. It is also not clear how this roller door will be controlled, e.g., remote control, number-plate recognition, keypad / card readers, etc. Minimum overhead clearance for each car parking area has not been identified in the 'Traffic and Parking Report', including passage through the subject roller door.

The offset of the proposed access point measures approximately 0.26m from the adjoining stobie pole, i.e., less than the minimum required 0.5m.

The proposed wheelstops within this car parking area as identified in the 'Architectural Plans' are not dimensionally compliant with AS/NZS 2890.1:2004.

Notwithstanding that two SDA apartments are proposed, it is identified that there is no accessible parking proposed on-site for use by persons with a disability.

Apartment 007 has minimal protection from the adjoining driveways associated with both the apartment and townhouse components, with only 0.3m landscaping strips between this dwelling and both driveways. Redesign or physical protection measures such as bollards should be considered to protect the occupants of the bedrooms of this dwelling from potential oncoming vehicular conflict from both adjoining internal driveways.

SUMMARY

In summary, we consider that there are various concerns associated with the proposed development relating to adequacy of car parking, vehicular site access, impact on the adjoining Gibson Street and Hawker Street intersection, sight distances, waste collection, bicycle parking, on-site design deficiencies, internal pedestrian safety, and internal apartment occupant safety.

I can be contacted at (08) 8271 5999 or andy@pwattraffic.com.au to discuss this matter further as required.

Yours sincerely,

Andy Hayes | Traffic Engineer
Phil Weaver and Associates Pty Ltd



Dear Alex,

RE: Project Proposal:Uniting on Hawker 2-10, 12, 14, 16, 18 Market Place & 105 Gibson Street, Bowden

Thank you for engaging us to conduct a preliminary site assessment to assess any existing trees.

The table below provides all relevant tree data and ratings of the existing trees:

Tree Number	Tree Owner	Species	Status	TPZ radially in M	Health	Structure	ULE	Retention Rating
1	Private	<i>Eucalyptus camaldulensis</i>	Significant	12.36	Good	Good	Long 40 years +	High
2	Private	<i>Hymenosporum flavum</i>	Regulated	6.48	Good	Good	Long 40 years +	High
3	Private	<i>Callistemon citrinus</i>	Regulated	6.36	Good	Good	Medium 15 -40 years	High
4	Private	<i>Casuarina cunninghamiana</i>	Significant	7.08	Good	Good	Long 40 years +	High

Table 1

The proposal seeks to construct 48 dwellings which consists of 42 apartments across three levels and 6 two storey town houses.

The architectural plans only highlight one tree on the site which has been labelled as 'Regulated'. However this status is incorrect, and there are additional trees which are either Regulated or Significant as per the *Planning, Development and Infrastructure Act 2016*. Trees defined as Regulated or Significant should be preserved *if* they meet the relevant environmental criteria within the *PDI Regulations 2017* and desired Performance Outcomes.

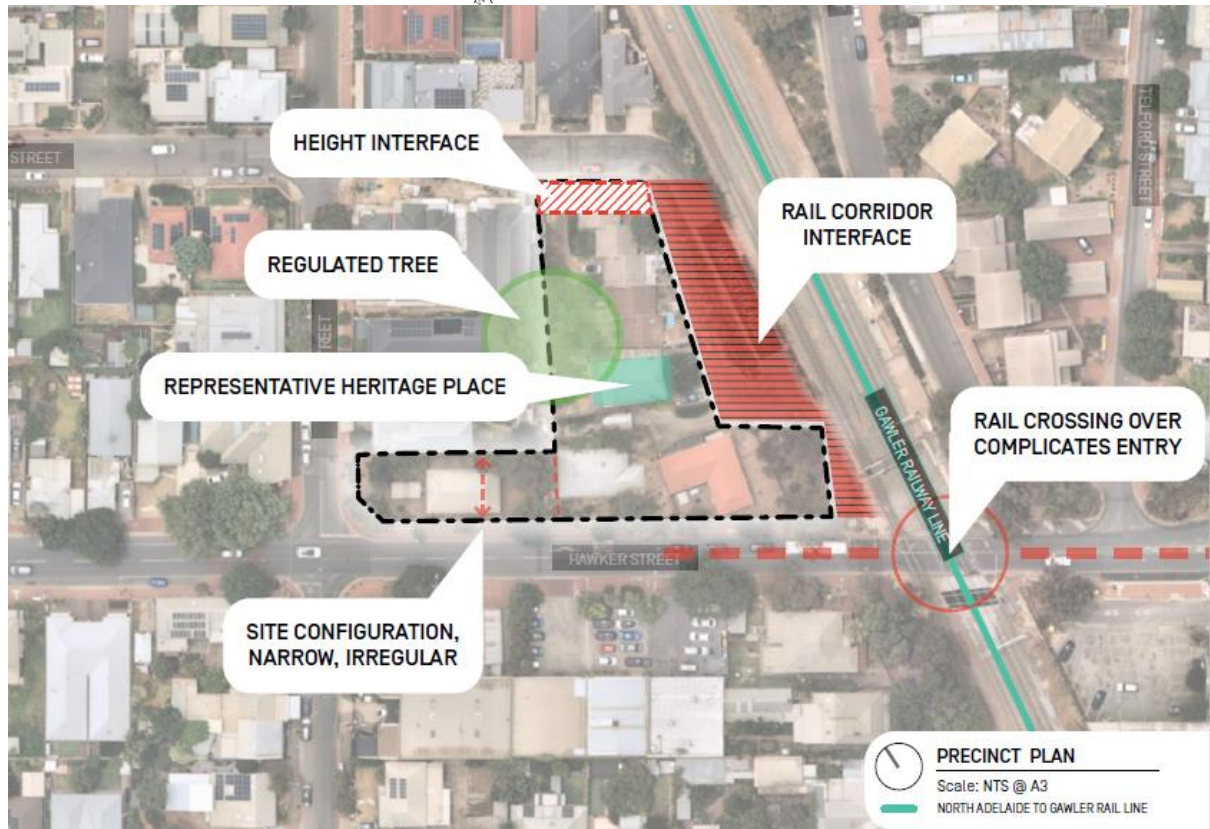


Figure 1



Figure 2

Tree Images






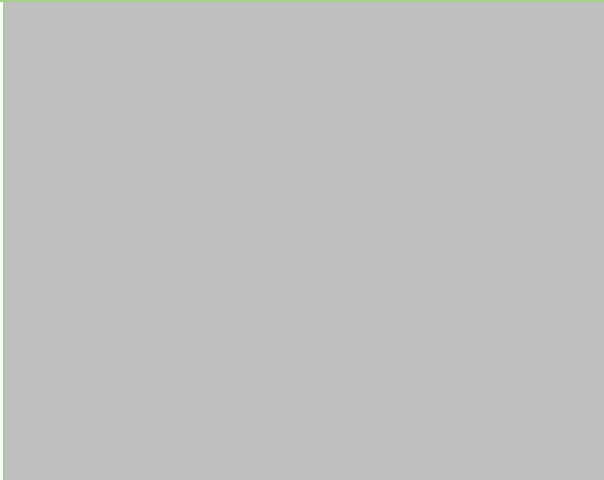
		
Tree 1	Tree 2	Tree 3
		
Tree 4	Group of Council trees	

Table 2



Observations

The area is subject to the following overlays as per the SA property and planning atlas:

- **Regulated and Significant Trees** - The Regulated and Significant Tree Overlay seeks to mitigate the loss of regulated trees through appropriate development and redevelopment.
- **Urban Tree Canopy** - The Urban Tree Canopy Overlay seeks to preserve and enhance urban tree canopy through the planting of new trees and retention of existing mature trees where practicable.
- **Historic Area** - ChSt2 -The Historic Area Overlay aims to reinforce historic themes and characteristics through conservation, contextually responsive development, design and adaptive reuse that responds to the attributes expressed in the Historic Area Statement.
- **Maximum Building Height (Levels)** - *Maximum building height is 1 level*

Tree 001 is the largest tree and has a large surface root that is at conflict with the existing infrastructure. This particular root appears to be a structural root that extends well into the TPZ and forms part of the lateral root system also. It is likely that this root is important to the anchoring, stability, and water resources of this tree and therefore it should not be pruned. It will a priority to any future development that infrastructure within the 12.36m TPZ of this tree is excavated non-destructively as per the appropriate methods within AS4970 – *Protection of Trees on Development Sites*.

Additionally, any new surfaces to be installed will have to account for this root, and therefore appropriate design solutions will have to be implemented to ensure the health and stability of this tree is not negatively impacted.



LSM TREE
ADVICE



Image 1 – Laser measure by uplift for reference.



LSM TREE
ADVICE



Image 2



LSM TREE
ADVICE



Image 3



LSM TREE
ADVICE



Image 4



In keeping with the existing taller trees on the site and the overlays that seek to protect these assets, serious consideration should be given to the retention of these trees. It should be noted that the initial architectural proposal has not accurately shown the amount and status of the trees that would be impacted by the future construction.

Thank you for the opportunity to provide this advice. Please contact me if there are any further questions.

Lawrence Skipworth-Michell

Consulting Arborist

AQF 8 – Graduate Certificate Arboriculture

AQF 5 – Diploma Arboriculture

VALID - Accredited Tree Risk Assessor

Representations

Representor 22 - Casey Scaife on behalf of ARTC

Name	Casey Scaife on behalf of ARTC
Address	11 SIR DONALD BRADMAN DRIVE KESWICK TERMINAL SA, 5035 Australia
Submission Date	05/05/2025 04:52 PM
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 support the development with some concerns
Reasons Please see attached.	

Attached Documents

Da24024441-ArtcSubmission-11065222.pdf



11 Sir Donald Bradman Drive
Keswick Terminal, SA 5035
PO Box 10343 Gouger Street
Adelaide, SA 5000

P. 08 8217 4366
F. 08 8217 4578
E. info@artc.com.au
W. artc.com.au

May 4, 2025

State Planning Commission
Level 10, 83 Pirie Street
Adelaide
SA 5000

To whom it may concern,

RE – Development Application 24024441 – 105 Gibson Street; 16 Market Place; 18 Market Place; 2-10 Market Place; 12 Market Place BOWDEN SA 5007

Thank you for the opportunity to comment on this development application adjacent to the ARTC land (rail corridor land). ARTC has no issue with the development, however we take the opportunity to advise our requirements 1) to your agency for assisting in reaching a decision on the application and 2) as information for the applicant in developing the site, should approval be granted.

1.0 GENERAL REQUIREMENTS:

1.1 Title:

Applicant to ensure property Title and survey searches are undertaken to clearly identify the property boundary between the development and the rail land. No part of the development shall encroach onto the rail land, or any right of way granted in favour of ARTC.

1.2 Access:

Applicant is required to contact ARTC if any access onto the rail land is required in order to perform work on the development and **must not enter onto the rail land without written approval** from ARTC and compliance with all requirements set by ARTC.

1.3 Adjacent Works:

The applicant **must** also prevent any item of plant from escaping or entering onto the rail land or in any other way interfere with ARTC infrastructure or rail operations.

1.4 Drainage:

No stormwater run-off is to be directed to or be allowed to disperse onto the rail land.

1.5 Setbacks and Lighting:

The placement of buildings and structures and lighting on the adjoining land should not interfere with the sighting of railway signals or level crossings.



11 Sir Donald Bradman Drive
Kewick Terminal, SA 5035
PO Box 10343 Gouger Street
Adelaide, SA 5000

P. 08 8217 4366
F. 08 8217 4578
E. info@artc.com.au
W. artc.com.au

1.6 Fencing:

Any fencing is the responsibility of applicant. ARTC is not obliged to contribute to the erection or maintenance of boundary fencing under section 15 of the Railways (Operations and Access) Act 1997. If the development involves livestock, suitable fencing must be installed to prevent animals straying onto the rail land.

1.7 Noise and Vibration:

The applicant should give consideration to rail noise and vibration as this may affect the perceptions of prospective persons seeking residential amenity. ARTC, as the track owner, and the various above-rail operators will comply with all legal requirements of their specific EPA Licence terms and conditions regarding noise and vibration, if applicable.

Whilst the proposal does not at this stage appear close to ARTC, it is important to consider the Guidelines for the Assessment of Noise from Rail Infrastructure (SA EPA, April 2013), in addition to the Noise and Air Emissions Overlay and SA8, with new noise sensitive developments neighbouring existing active railway lines. Section 1.3.4 of the Guideline requires that noise and vibration must be predicted and considered in the design of noise sensitive developments proposed within 180m of a railway line.

ARTC further advises that mainline railtrack and the adjacent passing loop form part of the key interstate freight route and an average of 20 services per day currently pass by this location. The Australasian Railway Association's article titled Freight on Rail forecasts that there will be a doubling of the land freight movements by 2020 and a tripling of the movements by 2050.

ARTC recommend that any assessments of rail noise impacts take into consideration both current and future rail traffic. ARTC and its rail industry partners operate vital interstate and intrastate rail operations and must be able to conduct normal business and to grow the business.

1.8 Increased traffic/ traffic issues at adjacent level crossings (e.g. queuing):

N/A

1.9 Upcoming rail projects:

N/A

2.0 SITE SPECIFIC REQUIREMENTS:

2.1 N/A

3.0 FURTHER EXPLANATION & MITIGATION STRATEGIES:

N/A



11 Sir Donald Bradman Drive
Keswick Terminal, SA 5035
PO Box 10343 Gouger Street
Adelaide, SA 5000

P. 08 8217 4366
F. 08 8217 4578
E. info@artc.com.au
W. artc.com.au

Yours sincerely

Signed by:

99890632D1F4494...

Casey Scaife
Property Officer Adelaide

—

—

Representations

Representor 23 - Dimitrios Moutos

Name	Dimitrios Moutos
Address	PO BOX 647 Walkerville SA 5081 WALKERVILLE SA, 5081 Australia
Submission Date	05/05/2025 10:17 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

This development is excessively dense for this area as well as being too high. The density proposed is no way reflective of the density in the Established Neighbourhood Zone which mandates low rise development. The proposed façade is totally out of scale with other residential buildings in the area, which are predominantly one storey. Aspects are of poor taste and the proposed materials and design look low quality. The proposed development does not enhance our suburb. Increased traffic in the area, increasing danger as well as increased chance of accidents No visitor parking, so visitors and any additional cars will need to park on the street, further congesting the street. Waste management collection on Market Place is unchanged and there is a risk of dumping and overflow waste being left on the kerb. Loss of mature trees, one being significant. No replacement trees provided. This will negatively impact the tree canopy in the area.

Attached Documents

Representations

Representor 24 - Maria Moutos

Name	Maria Moutos
Address	PO BOX 647 Walkerville SA 5081 WALKERVILLE SA, 5081 Australia
Submission Date	05/05/2025 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

This development is excessively dense for this area as well as being too high. The density proposed is no way reflective of the density in the Established Neighbourhood Zone which mandates low rise development. The proposed façade is totally out of scale with other residential buildings in the area, which are predominantly one storey. Aspects are of poor taste and the proposed materials and design look low quality. The proposed development does not enhance our suburb. Increased traffic in the area, increasing danger as well as increased chance of accidents No visitor parking, so visitors and any additional cars will need to park on the street, further congesting the street. Waste management collection on Market Place is unchanged and there is a risk of dumping and overflow waste being left on the kerb. Loss of mature trees, one being significant. No replacement trees provided. This will negatively impact the tree canopy in the area.

Attached Documents

Representations

Representor 25 - D and M Moutos Pty Ltd Moutos

Name	D and M Moutos Pty Ltd Moutos
Address	PO BOX 647 Walkerville SA 5081 WALKERVILLE SA, 5081 Australia
Submission Date	05/05/2025 10:21 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 development is excessively dense for this area as well as being too high. The density proposed is no way reflective of the density in the Established Neighbourhood Zone which mandates low rise development. The proposed façade is totally out of scale with other residential buildings in the area, which are predominantly one storey. Aspects are of poor taste and the proposed materials and design look low quality. The proposed development does not enhance our suburb. Increased traffic in the area, increasing danger as well as increased chance of accidents No visitor parking, so visitors and any additional cars will need to park on the street, further congesting the street. Waste management collection on Market Place is unchanged and there is a risk of dumping and overflow waste being left on the kerb. Loss of mature trees, one being significant. No replacement trees provided. This will negatively impact the tree canopy in the area.

Attached Documents

Representations

Representor 26 - Rod Worthington

Name	Rod Worthington
Address	128 GIBSON STREET BOWDEN SA, 5007 Australia
Submission Date	06/05/2025 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?	Yes
My position is	I oppose the development
Reasons see attached	

Attached Documents

Uniting-SA-amended-RW-1496775.pdf

UNITING ON HAWKER

105 GIBSON ST, 2 -10,12,16 &18 MARKET PLACE
BOWDEN SA 5007

Representation by Rod Worthington:

I make the following representation in addition to the submission made by Mr Phil Brunning on behalf of myself and other residents.

I lodge this representation as an individual local resident and retired urban planner with over 20 years experience in both regards. I made a representation on the original proposal and now make the following comments in relation to the amended proposal. While I am not opposed to the provision of new community housing and in-fill development, I am still concerned by this proposal and the extent it departs from the Planning and Design Code (the Code).

I concur with the assessment made by Mr Brunning in that the amended proposal has a number of deficiencies and I still hold the following concerns:

- It proposes more than three times the number of dwellings sought by the Code.
- It exceeds the desired building height.
- It will result a shortage of vehicle parking for residents and visitors.
- It will result in unsafe and inconvenient traffic movements including those by emergency and essential service vehicles.
- A representative building containing two valued community dwellings will be demolished and lost.
- It does not respect and account for the significant trees and beneficial existing vegetation.
- The proposed building design is not complementary to the character of this area.
- Insufficient setbacks from Hawker Street will result in an unattractive entrance to the historic suburb of Bowden
- The resultant development would detrimentally affect the amenity of existing residents.
- The applicant appears to rely upon the good will of the Planning Authority instead of good design.
- The site is not well suited to the proposed development and will not provide good community housing.

My previous representation provides additional discussion of the above matters. I now make the following additional comments in respect to the amended proposal.

Failure to correctly undertake public notification.

As the owner of a property located within 25 metres of the subject development site I would expect to receive direct notification by way of letter as a number of my neighbours did (many located further away). I did not receive any direct notification of the original proposal nor the amended plans. I seek explanation and correction (in future) of this error and consideration as to whether this error is a fatal flaw in the processing of this application. I

confirm that despite correct notification, I was made aware of the proposal by way of word of mouth by neighbours sometime after the commencement of the notification.

Original proposal should not be used as benchmark

While the amended proposal is significantly better than the original it should be set aside and the amended proposal looked upon as a fresh proposal and assessed against the Code accordingly. The original proposal had many extreme departures from the Code and it has taken considerable time and community effort before the applicant has acknowledged the deficiencies of their plans.

Sub-standard vehicular access on Gibson Street

The amended proposal now includes the provision of a double driveway on Gibson Street servicing parking for 6 vehicles at grade and with two way movements. This worsens the already existing non compliant vehicle crossover and will create at least 6 times the vehicle movements in an unsafe location and manner. The applicant should explore the option of closing vehicle access from Gibson Street and providing an exit onto Hawker Street. I acknowledge this will require revision of the building design potentially placing the proposed residences closer to the corner of Gibson and Hawker. This would be more desirable from a streetscape perspective.

On-street parking over estimated

The traffic and parking consultant for this proposal and the nearby proposed expansion of the Greek Orthodox Church on Drayton street are to some extent relying upon the same on street vehicle parking. The various consultants are not allowing for the cumulative effect of this nor the City of Charles Sturt's proposed reduction of on street parking in local streets. For information the Greek Orthodox plans for expansion include a shortfall of at least 32 on-site vehicle parks.

Conclusion

We are all looking for good urban communities. We have been working together in Bowden to improve our community for many years and appreciate and embrace the diversity within. The Uniting SA proposal however does not support these endeavours. More importantly however it departs significantly from the Planning and Design Code and is not worthy of approval without further improvements to address the above matters.

Rod Worthington
128 Gibson Street, Bowden.

Representations

Representor 27 - Susan Mc Govern

Name	Susan Mc Govern
Address	21 Gilbert Street OVINGHAM SA, 5082 Australia
Submission Date	07/05/2025 09:49 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

We all have to follow the rules of the area we love in. People coming into the community make big financial decisions with the safety of knowing these rules are followed. When developers come in and disregard the rules it's simply not fair and affects our properties and our lifestyles. This area has loads of social housing and we paid 7 figures to live here, knowing this information. That's something we were okay with. Now, this site should only have 12 dwellings on it, not 30. If the amount of social housing continues to increase in this already high social housing area, it devalues our property and affects our safety and lifestyle. I say safety because we have small children and there are characters in the area that already do not make us feel safe. The current social housing is not managed well so we don't trust this will be managed any way better, despite promises. This area holds 7 figure properties, it's apartments and dense living has increased, the streets are full of cars, it's too much. The rules need to be followed or what are they for? 12 dwellings max, more off street parking, respect the historic overlay rules and leave significant trees and buildings. Council should know their own rules, it shouldn't be up to residents to ask them to be enforced. If they don't have to follow the rules, can we start knocking our 1910 cottages and building 2 and 3 storey apartments?? So many beautiful homes are gone already. Hold on to the history of the area and let it flourish into a valuable location. By all means, build new homes for social housing, but fit it into the landscape and respect the rules like we all have to.

Attached Documents

Representations

Representor 28 - Skender Bayaziti

Name	Skender Bayaziti
Address	114 Drayton Street BOWDEN SA, 5007 Australia
Submission Date	07/05/2025 11:29 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
I agree that low income housing is needed, especially women/women and their children escaping violence, or to cater for families, which need 3 bedroom dwellings, or even for first home buyers. I do wonder how many houses will truly benefit these groups and not be bought as investment. I would hope there are rules in place to prevent this. However, developers need to meet zoning and heritage overlay rules, and Plan SA needs to ensure this happens.

Attached Documents

Representations

Representor 29 - Brooke Schiller

Name	Brooke Schiller
Address	8 Thirteenth St BOWDEN SA, 5007 Australia
Submission Date	07/05/2025 02:45 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
The proposed 30 dwellings is still significantly above the code provisions, being 12 dwellings. Therefore this development is a non-compliant to the building code as it applies to this Established Neighbourhood Zone. The density proposed is in no way reflective of the density in the ENZ which mandates low rise development. Apartments of this scale are not in keeping with the current character of the Established Neighbourhood Zone which currently supports townhouses and single residential dwellings. The Gibson Street entry point to the car park does not comply with the code. It is too close to Hawker Street and therefore presents a collision risk to the community. All Hawker Street trees are removed between Gibson Street and the railway line and no replacement street trees provided. Most of the vegetation will be removed desecrating the tree canopy.

Attached Documents

Representations

Representor 30 - Sandra Ball

Name	Sandra Ball
Address	106 Drayton St BOWDEN SA, 5007 Australia
Submission Date	07/05/2025 05:37 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 acknowledge that this application has made improvements on the original proposal. However this does not make it acceptable. It continues to be in breach of the SA Planning Code to a very substantial extent. I am particularly concerned about the following ways that it does not conform to the Code. 1. The density for this Established Neighbourhood zone provides for 13 dwellings on this area of land. 30 dwellings breaches this by more than 3 times. This would establish a precedent that could be used by future development to further erode the character and nature of this area. 2. The reduction of tree canopy is disastrous for a suburb which already records some of the highest temperatures in Adelaide. A second significant tree is not acknowledged in the application, which proposes its removal along with all other substantial and established trees currently on that land. Removal of street trees will degrade the physical appearance of the whole area. Proposed landscaping is highly inadequate to compensate for this loss of tree canopy. 3. Traffic flow and parking. The proposal for 28 car parking spaces falls short of the required 31. Each proposal for development in this neighbourhood cites the same street car parks as adequate, as though it is the only development that will use them. Already they are being impacted by town houses and the increased use by the Greek Orthodox Archdiocese on Drayton Street. The access driveway on Gibson St will be dangerous for the number of cars that will need to use it under this development. The back up of traffic along Hawker Street can be substantial and frequent, making this access point close to Hawker street potentially unsafe. In closing, I note that the development is targeted at older women. This is a laudable aim, but I find it potentially discriminatory that it is seen as acceptable that housing for older women can fall so short of minimal requirements of the Planning Code. Sandra Ball

Attached Documents

Representations

Representor 31 - Cheryl Jaeschke

Name	Cheryl Jaeschke
Address	16 Quin Street BOWDEN SA, 5007 Australia
Submission Date	07/05/2025 06:32 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	

Attached Documents

DA-24024441-Uniting-on-Hawker-Development-C-Jaeschke-1497351.pdf

Representation in relation to Development Application 20424441

Application 24024441 by Uniting SA Ltd is for the development of 30 residential flats.

I am a resident living on the corner of Thirteenth Street and Quin Street Bowden, in close proximity to this development. I am an active member of the community with a keen interest in improving our streetscape and tree canopy. I value the historical character of our neighbourhood, the visual streetscape and the people who live in it.

In response to the Application, I am submitting this representation to **reject the application** and explain the reason for this decision.

Introduction

My major concerns are summarised as follows:

- Non-compliance with the Established Neighbourhood Zone code
- Non-compliance with the Ovingham Historical Overlay code
- Poor Integration with the Community
- Site Density and Building Mass
- Reduction of Tree Canopy and Significant and Regulated Trees
- Traffic Flow in Gibson Street and Market Place
- Car Parking

The extent of the request for exclusions from compliance to building codes and overlays including Density, Height and Setbacks, Heritage, Significant and Regulated Trees, Car Parking and Traffic will significantly impact the quiet enjoyment of surrounding residents and pays no consideration to the protections provided by the codes for our neighbourhood.

The Ovingham Historic Area statement should protect Bowden and Ovingham from this type of non-compliant development.

In addition, the developer plans to extensively destroy the existing Tree Canopy and some Significant and Regulated Trees.

Integration with the Community

I value the sensitive integration of social housing in our neighbourhood but not at the density that is proposed. It is noted that:

- ☐ Bowden currently has > 130 social housing dwellings between Gething Place and Seventh Street (north to south) and Drayton Street to the Gawler Railway line (West to East) plus >70 dwellings in Ovingham which are all in the Ovingham Established Neighbourhood Zone.

I understand the need for change with social housing renewal programs. However, the saturation of social housing in Bowden has a limit. The density, poor street interface and lack of diversity of this development, on this very constrained site, is grossly excessive.

The inner north-west is doing the heavy lifting for high density housing in our city, both social and private.

Bowden has finally dispelled the reputation of being the 'slum' of Adelaide. It is now a vibrant suburb with extensive street art and landscaping that links our community. Uniting SA Housings inappropriate development proposed for this site is a significant step back to a very sad chapter for this suburb and risks creating a high density social housing ghetto that sets an alarming precedence for this historic area of Bowden.

Site Density, Building Mass and Historical Overlay

The developer has referred to the red brick fence fronting Hawker Street as a fortress. As a long term resident this is not how I and other residents see it.

When Hindmarsh Council built the three existing houses in circa 1982, they built the red brick fence as a nod to the heritage of the area and to protect the residents from the noise and intrusion of the trainline (freight trains), the Hawker Street train crossing signals and the idling traffic on Hawker Street. The council also built a mound in Market Place for the same reasons and established the small pocket park as a buffer.

Many of the surrounding buildings in Trembath, Hawker and Gibson Streets are built from red brick and stone (refer Architectural Planning Report Page 10 photographs). The developer has put forward a design that is not aesthetically compatible with this palette.

The developer claims that the proposed development is an empathetic and contextually responsive design. I dispute this. The proposed frontage on Hawker Street is predominantly white with non-compliant setbacks, dominating the streetscape with minimal landscaping and minimal tree canopy.

All current frontages on Hawker Street Bowden between the railway line and Brompton are just one storey. The setbacks are insufficient to save this building from being an absolute eyesore at the entrance to Bowden. The height of the buildings exceeds 6 metres and does not meet the code.

If approved, this building will redefine the area, forever changing our historic character suburb and set an unwanted precedence for similar out of character developments.

The intended removal of all street trees and existing tree canopy by the developer will remove any screening of the upper floor balconies which we can expect will house laundry, storage containers, bikes etc. The design of the proposed balcony railing provides no visual buffer from the street and the landscaping planter boxes are unlikely to be irrigated and risk neglect and an unsightly outcome for the community.

The density of the development does not comply with the provisions of the code for ENZ which is limited to 11 flats for this site.

There is a representative building on this site which is deserving of the protection afforded by the Ovingham Historical Overlay provisions. This DA does not comply with the Established Neighbourhood Zone or the Ovingham Historic Overlay.

Reduction of Tree Canopy

The DA only identified one (1) Significant Tree on the site. I have been made aware of a second Significant Tree on the current Gibson Street property. In addition:

- The proposed demolition includes all trees, except for one Significant Tree on a shared boundary and two large shrubs/small trees on Gibson Street boundary.
- All street trees on the Hawker Street frontage and Gibson Street will be removed to make way for the development.

- Over 20 trees with some trees 7-15 metres high will disappear including the second significant tree.

Bowden has been identified as the third hottest suburb in the City of Charles Sturt and the proposal to decimate the tree canopy on this site will make it an even hotter place in the face of climate change and should not be allowed.

Removal of the tall trees will have a huge negative visual impact on the gateway to Bowden for both residents and visitors.

Traffic Flow

Gibson Street - The ingress/egress on to Gibson Street is dangerous due to the close proximity to Hawker Street restricting line of sight. This is non-compliant and creates an unacceptable risk to turning and approaching vehicles.

Market Place – I am particularly concerned about the potential congestion at the Market Place cul-de-sac. With a high number of visitor and residents expected to use the on-street carparks, the potential for conflicts with traffic, parking and particularly the poor turning circle at the cul-de-sac needs to be understood.

The DA only addresses the Garbage Truck management - no other vehicles movements are discussed.

My concerns are:

- Cyclists, of which I am one, frequently use Market Place rather than Gibson Street as this road provides a safe link through to established cycling routes to the city and beaches. The risk of collision between cars and bikes on this narrow road is significant.
- Currently the section of road from the bend to the cul-de-sac services only two (2) driveways for the four (4) houses at the end of the road. Three (3) of the houses have off street parking and one (1) house uses on- street parking
- The ANR technicians who need access to the national freight line signal box adjacent the Hawker Street rail crossover and the council gardener are routine users of the three (3) car parks adjacent the cul-de-sac.
- Parking is allowable on both sides of the entire street from Gibson Street to Market Place cul-de-sac, including adjacent the railway line and the landscaped mound. I have been advised by Council that this mound will not be altered for this development, having just been reconstructed and landscaped following community consultation
- Five (5) new townhouses (all 4 bedroom) have been completed this year on Market Place near Gibson Street. There are now eleven (11) driveway crossovers which has reduced the number of available car parks and residents and visitors are now parking along the railway line and adjacent the mound
- From the bend, Market Place is a narrow road allowing for unimpeded two-way flow but only when there are no cars parked along this street. In addition, there is no footpath

provided on the road (adjacent the railway line or the mound) so people alighting from a vehicle are walking on the road

- In my observation and personal experience, turning manoeuvres for vehicles arriving at the end of the cul-de-sac are tight with cars required to do up to a six-point turn to exit when there are cars in the cul-de-sac parking bays
- Large vehicles, including the Garbage truck rely on the existing crossover into a private driveway to turn around. **This driveway will be removed in the DA proposal making it almost impossible for large trucks to safely turn around.** It is noted in the proposal that parking restrictions will apply to the 3 cul-de-sac car parks on garbage collection days but this does not alleviate the problem for large delivery vehicles (eg Furniture and Food) at other times

The proposed 30 new dwellings will significantly change the parking and volume of traffic on Market Place and it's obvious this highly constrained, small service road was not designed to accommodate this scale of development.

Market Place - Pedestrian Access to the Complex

In order to understand the problems than may arise from Uniting SA Homes' choice to not have an internal driveway to handle their traffic movements, the following information is my reading of issues regarding access to the complex.

The only pedestrian access into the complex for all upper floor residents and visitors is through one external gate on Market Place unless they snag an internal car park.

The cul-de-sac is where:

- 3 times per week a contractor's Garbage Trucks will pick up skip bins which will be placed on the footpath for collection (noted in the Waste Management Plan). This means that the cul-de-sac parking and footpath is interrupted on three days per week. On Thursdays the routine council garbage truck will pick up rubbish bins from Market Place and will require turning at the cul-de-sac as there is not opportunity to turn before the bend
- Pedestrians (including wheelchair users, prams, etc) and cyclists arrive in Market Place from Hawker Street
- Furniture Removal Vans will park and unload, possibly for hours. It appears they must go through the Zen Garden to deliver furniture as there is no access to the internal carpark for this function. Due to the design of the Car Park access from Market Place, there appears to be insufficient height clearance for trucks to access the residential car park.
- Parcel deliveries, Supermarket deliveries, Fast Food etc will deliver to Market Place
- Uber/Taxi Drivers, Council's Community Bus, etc will deliver and pick up people here. There doesn't appear to be any shelter for people waiting for transport or pick up by friends/relatives etc. This is a secluded area with poor lighting which raises the question of a safe environment for 55+ aged vulnerable women while awaiting transport at night

- Emergency vehicles ie Fire & Ambulance access to Market Place is problematic. As this is a Class B building 4 fire trucks will attend any call out

It is easy to see the congestion, conflicts and potential danger that vehicles using this cul-de-sac will create. At times trucks and cars will have to reverse out of Market Place and proceed around the bend to release vehicles from the bottleneck if most car parks are taken. The solution must surely be to have an internal road in the development to alleviate this serious conflict.

Car Parking

I urge SCAP to take into consideration the still live Application 23033068 by The Greek Orthodox Archdiocese of Australia for the planned alteration and addition to place of worship and associated offices which is approximately 140 metres to the north, also on Hawker Street. Both applications rely on the same street parking spaces on Hawker Street and the surrounding streets to justify their non-compliance to parking requirement.

Consideration should also be given to the 5 recently completed town houses at 2a-2d Market Place, Bowden which now impacts the availability of on-street parking spaces.

The code is specific on the parking requirements for residential flats. The DA highlights a 3 car park shortfall with no on site Visitor Parking.

The Federal Government is allocating \$4.3b to support in home care to keep people out of aged care facilities when the new Aged Care Act commences in mid-2025.

All service providers will rely on the limited Market Place on-street parks to access the residential flats as there is no onsite visitor parking.

Conclusion

The proposal put forward by the applicant is just bad development which is evidenced by the number of exemptions requested for this site. The lack of nearby amenity such as pharmacy, medical, food shops and transport support the conclusion that this site does not meet the needs of the intended residents.

It is my view that the proposal is inconsiderate of the quality of life for residents who will be living closely to each other, in that no internal amenity such as BBQ area, suitable landscaping, play area or communal facilities have been provided. These recreational spaces are important for the wellbeing of residents, both adults and children and have been largely overlooked in this DA.

On the basis that the Development Application does not meet the applicable codes and overlays that offer protection to our historical suburb from this type of development, I request that the Application be rejected.

Cheryl Jaeschke

16 Quin Street Bowden

Representations

Representor 32 - Sebastien Ananian-Cooper

Name	Sebastien Ananian-Cooper
Address	PO Box 10231 ADELAIDE BC SA, 5000 Australia
Submission Date	07/05/2025 07:48 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 Please see attached. I support the development because South Australia desperately needs more housing and this a good place for more intensive development.	

Attached Documents

Sebastien-Ananian-Cooper-Submission-1497367.pdf

To whom it may concern,

I am one of the landowners at 2A Hawker Street, Ovingham.

I am supportive of the Uniting SA development on facing Marketing Place and Hawker Street in Bowden.

Our city faces a housing crisis.

A lack of suitable housing affects those at all income levels who don't own a home.

The current housing crisis is corrosive to societal cohesion.

If South Australians face a significant life setback (divorce, break up etc) and struggle to find suitable housing, it delays their ability to get back on their feet.

If South Australians cannot get a foot on the property ladder, they are less likely to feel invested in the community.

It is disappointing that various stakeholders did not put much weight on these broader impacts when urging the downsizing of this development.

We need more well-placed residences. Housing, of all kinds, needs to be built urgently.

This is an area of Adelaide that is well connected to public transport and well suited to more intense development.

It makes little sense that the government is supportive of more intensive development at places like Bowden and Southwark, but not in this area of Ovingham. More intense development can still be undertaken whilst maintaining the community and historical ambience of the surrounding neighbourhood.

There is sufficient car parking for the development, not everyone wants to drive a car these days. This is a neighbourhood where a lot can be reached by foot or bike, including those who work in the city.

I encourage the panel to support this project and I would like to address the Panel in relation to my representation

Yours sincerely,

Sebastien Ananian-Cooper

Representations

Representor 33 - Aaron Ramsay

Name	Aaron Ramsay
Address	2a Hawker Street OVINGHAM SA, 5082 Australia
Submission Date	07/05/2025 08:15 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 support the development
Reasons The development is for a worthwhile purpose. It is appropriate for the location. We look forward to welcoming the residents to our neighborhood.	

Attached Documents

Bowden-Gym-Collective-1497381.pdf

Dear Panel,

I am the owner of the Bowden Gym Collective, located at 2A Hawker Street, located 50 metres away (across the railway line) from the proposed development.

Bowden Gym Collective prides itself on its strong community focus. Many of our members, and some of our staff have been at the gym for more than 30 years.

Our strong attachment to the community means we were kept updated “on the grapevine” about what was occurring with this proposed development.

I was disappointed to hear that the development was scaled back, apparently for carparking and building height reasons.

High quality social housing is something we should all support. And what a perfect location it is - very well connected to the city to amenities by foot, bike and public transport.

I live locally. Amenities that would be useful for women needing housing are plentiful. Access to education, the brand new Botanic High School schools and universities via public transport if they also have children. Medical facilities are close by. There is availability at the local GP. Importantly these places are all accessible without a car. It's hard to think of a better location for social housing.

Car parking is not the be and end all. In our case many of our gym members walk or ride to our classes. I'm no expert in planning rules, but to a casual observer, 3 stories didn't appear too high. We have townhouses across from our gym which are already of that height. We need more modern designed, compact development in the inner suburbs, it seems logical for those that do not want to live in further out growth areas.

We will welcome the new residents of the new Uniting SA development with open arms. It is just a pity that we will not be able to welcome more of them.

I wish to address the Panel in relation to my representation.

Yours sincerely,

Aaron Ramsay

Representations

Representor 34 - Brett Morris

Name	Brett Morris
Address	5007 BOWDEN SA, 5007 Australia
Submission Date	07/05/2025 08:50 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 development does not sit in line with current zoning laws. Setbacks are non existent- bland and ugly buildings facing market place does nothing for the heritage overly of the suburb. Some of us (who live here) think heritage is important. Traffic on Market Place, Gibson and Thirteenth st will be a nightmare - with all vehicles entering and leaving 1 driveway on Marketplace. Insufficient parking is available and will clog up our small roads - suggested parking on Gilbert st is laughable. I believe this is lazy planning, design and everyone thinks it has been rubber stamped by the government so no need to put any thought into it. I support community housing - we had lovely neighbour's who were kicked out months ago and these properties left vacant. Do the right thing by the people currently living locally, return the tenants to these properties or make the development suitable to current council zoning laws

Attached Documents

Representations

Representor 35 - Michael Smiljanic

Name	Michael Smiljanic
Address	16 Quin Street BOWDEN SA, 5007 Australia
Submission Date	07/05/2025 10:05 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	

Attached Documents

Revised-Market-Place-development-Mike-Smiljanic-1497571.pdf

Re: Development Application 24024441, as amended

Two-storey residential flat building comprising community housing dwellings (28) and supported accommodation premises (2) and demolition of buildings including one Representative Building with associated car parking and landscaping

I have been a resident of Bowden since 2018, a relative newcomer by local standards. The eclectic mix of residents living in private and public housing works well for the most part.

I am cognisant of the need for more social and affordable housing, and I would welcome a reasonable proposal for more to be built in the area however I do not support the proposed development application (DA) for the following reasons:

Density and form of the proposed development

While the amended proposal significantly reduces the number of dwellings in this development it is still a very large development and well in excess of what is expected under the code.

The locality is in the Established Neighbourhood Zone and covered by a Historic Area Overlay. There is a requirement for new development to be “sympathetic to the predominant built form.” The applicant has argued that there is no consistency in the existing built form in the area and has chosen to “cherry pick” examples of existing buildings that might support its proposal.

- 2 three storey social housing unit blocks along the railway corridor are used to support the scale of this development. The units are fifty metres away at the closest point, on the other side of two roads, 3 railway tracks and are in a different suburb (Ovingham).
- A former shop on the corner of Hawker and Gibson Street built without a setback is used to justify not doing the same.

These examples are atypical and should not be considered in any discussion of the predominant built form.

There is nothing in the area approaching what is being proposed. The mass of the built form will irrevocably change the character of this part of Bowden.

The applicant claims compliance with an overlay that by their own admission does not even apply as justification for the shortcomings in its proposal:

“the proposal will provide affordable housing outcomes (despite an Affordable Housing Overlay not applying to the site)”

Reduction in tree canopy

The proposal looks to remove nearly all tree cover on the site as well as the street trees planted on Hawker Street

The applicant reports only 1 *regulated* tree, a eucalypt, when it should correctly be recorded as a *significant* tree. There is also a casuarina on the site that I believe qualifies as a significant tree and possibly others that might be considered regulated trees under new legislation.



Trees not considered in this development proposal

The [Western Adelaide Urban Heat Island Mapping Project](#) report * identifies Bowden and Ovingham as two of the hottest suburbs in the City of Charles Sturt Council area. Greening and tree canopy is widely recognised as a necessary means of mitigating the heat island effect. Removing trees on this site runs counter to building resilient communities in the face of climate change.

*Available on Councils website

All the trees in the image below will be removed and no replacement canopy is planned:



Corner of Gibson and Harker Street

The car park entrance at the corner of Gibson and Hawker Streets

The entrance to the proposed open car park at the corner of Gibson and Harker Streets is too close to the corner and I believe unsafe. While the planned entrance will be marginally better than the one that exists currently there are now 6 car spaces to service instead of the 1 and I believe that multiplies the likelihood of accidents occurring at this intersection.

Conclusion

That there is a need for suitable housing for people at risk of becoming homeless is undeniable. I respectfully request however that the panel considers the short comings of this proposal in its current form and denies consent.

Mike Smiljanic, 7th of May 2025

16 Quin St, Bowden SA 5007

Representations

Representor 36 - Jacqui Hunter

Name	Jacqui Hunter
Address	15 Gething Crs BOWDEN SA, 5007 Australia
Submission Date	08/05/2025 09:37 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

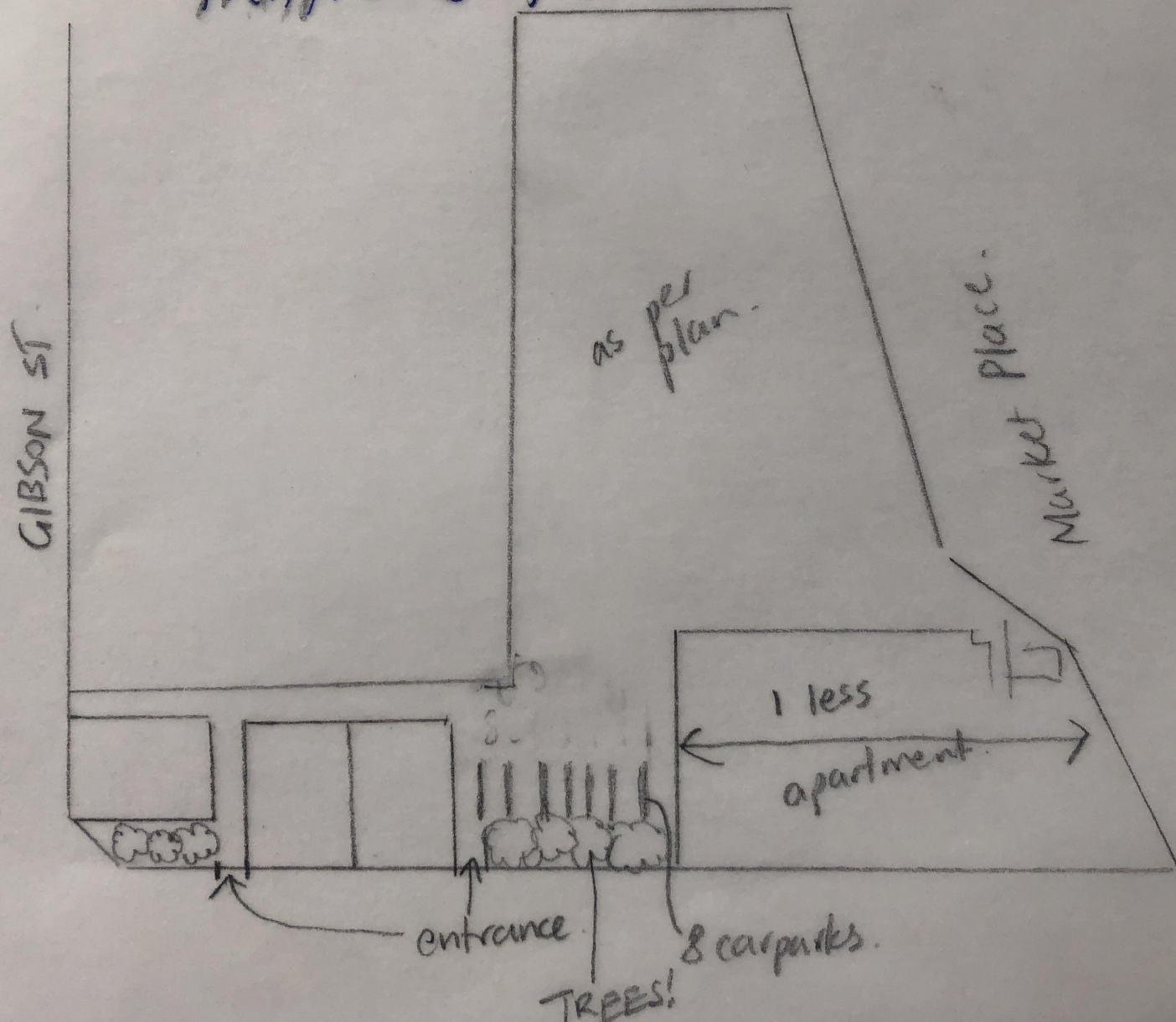
I applaud the plan to create more housing for women at risk of homelessness however I have concerns about this design for both the future residents and the local community. I live in relatively close to this development and walk, cycle or drive past at least once or twice every day. I am an active member of the community and coordinate the Mudge Way community garden down the road as well as instigating many community art projects over the years. In response to the Application, I am submitting this representation to reject the application due to traffic problems and tree/ plant reduction.

- Gibson Street vehicle entrance: The intersection of Hawker Street and Gibson Street is one that I frequently navigate. It can be extremely congested with buses and cars backed up due to train and traffic light delays, as well as cars entering or exiting their property on Gibson Street. It is already very difficult for cars to enter or leave the driveway into an already congested intersection, and additional 6 cars as per the DA would create chaos and possible danger for the many users of this intersection.
- I am concerned about the loss of street trees along Hawker Street, and the loss of other large trees from this site. We need to increase our green canopy - not decrease it. I have attached an alternative idea to address these issues.

Attached Documents

alternative-idea-to-improve-traffic-and-trees-1497614.jpg

Alternative to improve
Traffic & Trees!!



Representations

Representor 37 - Bethany Loates

Name	Bethany Loates
Address	135 Coglin Street BROMPTON SA, 5007 Australia
Submission Date	08/05/2025 10:08 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

Development-Application-24024441-Uniting-on-Hawker-1497623.pdf
Appendix-1-Train-timetable2-1497624.pdf

To: State Planning Commission

RE: Objection to Development Application 10876419 – Market Lane, Bowden

I am writing to strongly object to Development Application 24024441, recently resubmitted by Uniting SA for a two-storey residential development at Hawker Street/Market Lane, Bowden.

As stated in my previous submission, I am not opposed to social or community housing within Bowden, nor to supported residential facilities. However, Uniting SA's continued departure from the Planning and Design Code (the Code) represents a significant overdevelopment of this site. This development risks negative outcomes for both future residents and the broader Bowden community.

While addressing the housing crisis is essential, it must be done thoughtfully and in a way that preserves the character and liveability of our neighbourhoods. Though the design has changed since the previous submission, serious concerns remain.

I make this submission as the property owner and future resident of 109 Drayton Street, Bowden, and as a member of this community for over 16 years.

My key concerns are:

- Non-compliance with the Historic Area Overlay – ChSt2
- Loss of the representative buildings
- Significant overdevelopment of the site
- Loss of tree canopy and regulated/significant trees
- Inadequate parking provision
- Proximity to services

I implore the State Commission Assessment Panel (SCAP) to reject this development as it is grossly at variance with the Code. If approved, Uniting on Hawker will fundamentally alter the historic fabric of the last connected heritage area of Bowden and have negative impacts on the surrounding existing community and residents of the development alike.

Historic Areas Overlay – ChSt2

The Planning and Design Code emphasises that any new development must be contextual—carefully responding to its surroundings and contributing positively to the character of the area. This part of Bowden is recognised for its historically significant character, defined by small, narrow allotments and predominantly single-storey, detached or semi-detached workers' cottages, bungalows, and austerity homes.

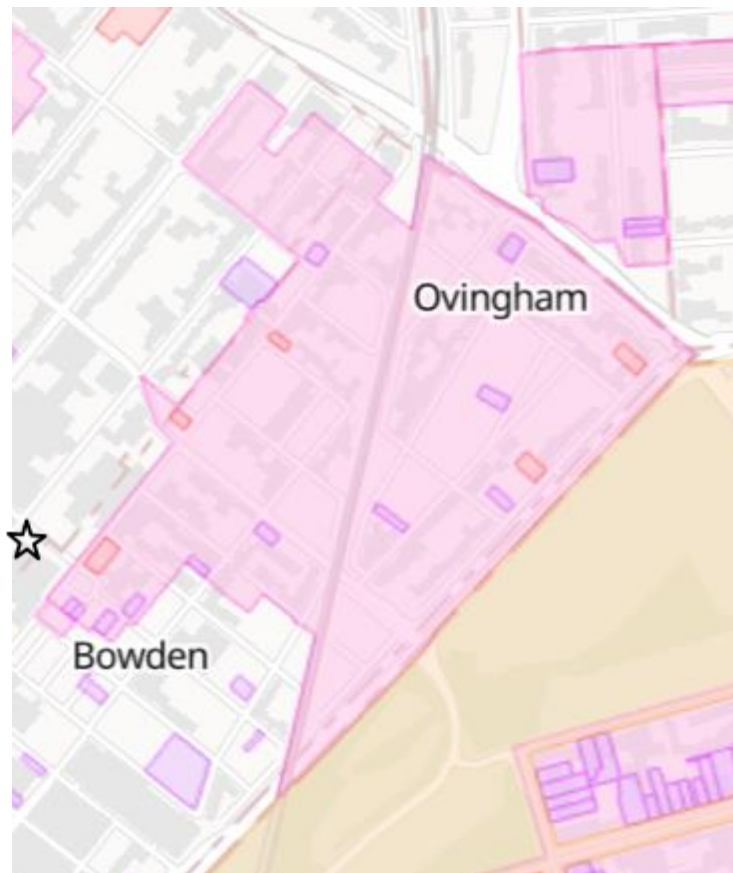


Image 1. Screen capture from the Greater Adelaide Regional Plan heritage overlay for the Bowden and proposed Uniting on Hawker Site with star denoting proposed development site.¹

Key features of homes in the area include:

- Building heights limited to a single storey, with a minimum ceiling height of 3 metres
- Traditional materials such as bluestone, sandstone, and pressed metal or corrugated iron
- Gabled or hipped roofs facing the street, often complemented by separate veranda structures

The proposed development represents a significant and unjustified departure from the heritage requirements outlined in the Code. While it makes a superficial attempt to consider nearby attributes, the overall design continues to ignore the area's established character, introducing a scale and density that are inconsistent with both the historical context and the Code's intent. This is a clear overdevelopment of the site—and on that basis alone, the application should be rejected.

If approved, this building will dominate the entrance to Bowden and Brompton from Hawker Street. Instead of providing a respectful transition into a cohesive, heritage-rich neighbourhood, it will signal that this part of the city is open to poor design and overdevelopment. For many of us,

¹ [Digital Regional Plans](#)

Bowden's heritage isn't just a backdrop—it's the heart of our community. This proposal doesn't honour that; it disregards it entirely.

Rather than responding thoughtfully to its surroundings, the design imposes a bulky, block-like form, a half-hearted attempt to use similar materials, and an aesthetic that clashes with the historic streetscape. While contemporary architecture can be appropriate in heritage areas, the lack of setback from Hawker Street and the building's sheer mass will overwhelm a neighbourhood known for its human scale and charm.

It's true that Bowden has always embraced a mix of affordable housing—from workers' cottages to Housing Trust homes. But historically, these have been sensitively integrated, or "salt and peppered," throughout the suburb in ways that align with prevailing development patterns and design expectations. By contrast, this proposal concentrates high-density housing in a single, highly visible location, undermining the traditions of integration and neighbourhood character. It fails to reflect the Historic Area Overlay or the spirit of the Design Code.

Ultimately, Uniting SA's proposal exploits Bowden's openness to diversity while offering little in return in terms of design quality, environmental performance, or contribution to place. Bowden is evolving—but that evolution must respect its heritage, not erase it. This development does neither.

Demolition of Representative Historic Buildings

The development proposes the demolition of two representative historic dwellings. As someone who owns and lives in a representative building, I understand firsthand the financial and practical challenges involved in their upkeep. However, with that ownership also comes a responsibility—not just to preserve bricks and mortar, but to honour the character and story they represent within our community.

Demolishing a representative building is not a decision that should be taken lightly. It must be justified by a proposal that clearly enhances the area—one that is of the highest architectural quality and deeply respectful of the historic context it replaces. This development does not meet that standard. Rather than elevating or enriching the streetscape, it erases the existing heritage by demolishing these representative buildings and the design further disconnects itself from the heritage character that defines this part of Bowden.

Excessive Density

The proposed development dramatically exceeds the allowable density for this site—nearly three times more than what is permitted under the Planning and Design Code. This is not a minor variation or technical oversight; it reflects a fundamental disregard for the planning rules that every other property owner, including myself, is expected to comply with. These rules are in place to

protect the character, amenity, and liveability of our neighbourhood, and they must be applied consistently if they are to have any meaning.

Under the Code, only 11 dwellings are permitted on this site. Even if the Affordable Housing Overlay were applied, that number would increase to just 13. The proposal to construct 30 apartments is grossly out of step with these limits and with the expectations of the Historic Area Overlay, which does not support apartment buildings in this location.

The impacts of this excessive density include:

- Overdevelopment of the block
- Strain on local infrastructure and streets
- A built form completely out of scale and character with surrounding properties

This level of intensification is not in keeping with the historic, low-scale nature of the area. It risks undermining the integrity of the planning system and sets a dangerous precedent for future overdevelopment. The Code should not be optional—it is there to guide responsible development, and this proposal fails to meet even its most basic requirements.

Urban tree canopy

In February 2021, the South Australian Parliament passed a motion to:

Prioritise the protection of existing urban trees and green open spaces; and develop a comprehensive strategy to increase tree canopy and reduce hard surfaces (led by Green Adelaide) in collaboration with local government and local communities to create healthy and diverse urban forests across metropolitan Adelaide with the aim to, at a minimum, meet the urban green cover targets of the 30-Year Plan for Greater Adelaide along with a particular focus on areas identified as being most vulnerable to heat.

Heat mapping of this area indicates that, even with the current street trees, it remains one of the hottest spots in Bowden. The proposed removal of existing vegetation will only worsen the heat island effect and eliminate valuable shading for pedestrians along Hawker Street and Market Place as well as for the residential buildings.

In today's Climate Emergency, which was declared by the State Government in 2022, it is critical that we actively work to reduce the heat island effect for the wellbeing of residents and the surrounding environment. The proposed development represents an overdevelopment of the site, preventing the retention of the urban tree canopy and directly contravening both the Code as well as local and state policy on the importance of vegetation.

Additionally, it is understood that the proposed development site has two significant trees and two regulated trees – all which should be retained in any future development in this area. The single significant tree proposed to be retained will dramatically have its canopy altered as it will come into

contact – and conflict with – the second story of the development. Despite it being retained, its health will largely be jeopardised into the future.

Provision of Parking

Given the reduction in the number of apartments proposed from the initial application, the development now more appropriately reflects the provision of parking. However, there remains a shortfall of three parking spaces. Whilst this may seem minor to someone unfamiliar with Bowden, this is a shortfall that will have an impact on the community who already heavily on on-street parking including residents, the congregation of the Greek Orthodox Archdiocese on Drayton Street, and those using Parfit Square Park. We are all regularly utilising the same parking, making parking availability in the area increasingly scarce. Additionally, my property – built in 1900 – is landlocked in Parfitt Square and has no off-street parking available and exclusively relies on on-street parking.

The development proposal suggests that preference will be given to residents who do not own cars, but there is no assurance that this preference will continue in the future. The demographic of those in need of social housing may change over time, and it is unreasonable to assume that residents will not eventually acquire vehicles should their circumstances change.

The lack of off-street parking will place a burden on the existing community, and the proposed density of the development should be reduced to meet the Code and ensure appropriate off-street vehicle parking is accommodated.

Accessibility to Public Transportation

As I highlighted in my submission to the previous application – Uniting SA Housing Planning Statement asserts that the site's proximity to high frequency public transport supports a lower parking rate. However, upon reviewing the Traffic and Parking Report submitted by the applicant, there still remain significant discrepancies in both the proximity and the frequency of public transport services available. The report claims that the North Adelaide Railway Station is located approximately 500 metres south of the site and serviced by high-frequency trains on the Gawler Railway Line. It also references the Bowden Railway Station, located 785 metres to the south-west, which is serviced by the Outer Harbor and Grange Railway Lines. It is important to note that the actual walking distance to the North Adelaide Railway Station, as per Google Maps, is 700 metres, not 500 metres as stated.

The North Adelaide Railway Station does not operate on weekends and has limited weekday services, with trains running only every 30-60 minutes during peak hours. There is no service between 9:24am and 2:24pm, and services cease entirely at 6:24pm until the following morning.



Image 2. Screen capture of the Google Maps distance from the proposed development to the North Adelaide Railway Station.

Access to this station is also a concern. The shortest route involves a cut-through under Park Terrace, an area that raises significant safety concerns. As a female cyclist familiar with this route, I can attest to the poor visibility and its frequent use as a dumping ground for items left by people sleeping rough. The area is also marred by graffiti. Given these conditions, I avoid walking through this area alone, even during the day. It is reasonable to assume that women, particularly those aged 55 and over, would feel similarly unsafe navigating this route.

While the Ovingham Railway Station offers services throughout the day and on weekends, these are not frequent. Trains run every 30 minutes on weekdays, reducing to hourly on weekends and public holidays, which falls short of the high-frequency definition of every 15 minutes (Appendix 1). Furthermore, the Ovingham Railway Station is 700 metres from the proposed development site—well beyond the <400 metre benchmark for convenient public transport accessibility.

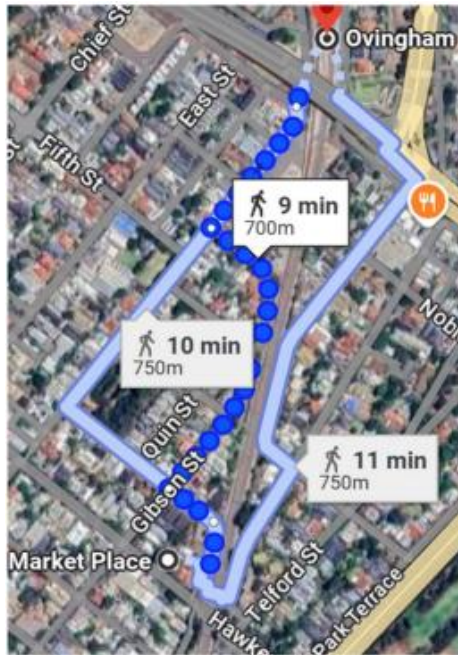


Image 3. Screen capture of the Google Maps distance from the proposed development to the Ovingham Railway Station

Although Bowden Railway Station does provide higher-frequency services, appropriate for the high-density development surrounding it, the actual walking distance to this station is closer to 1 kilometre, not the 785 metres claimed. Given these factors, it is reasonable to expect that residents will rely more heavily on private vehicles for essential trips, such as grocery shopping and larger outings.

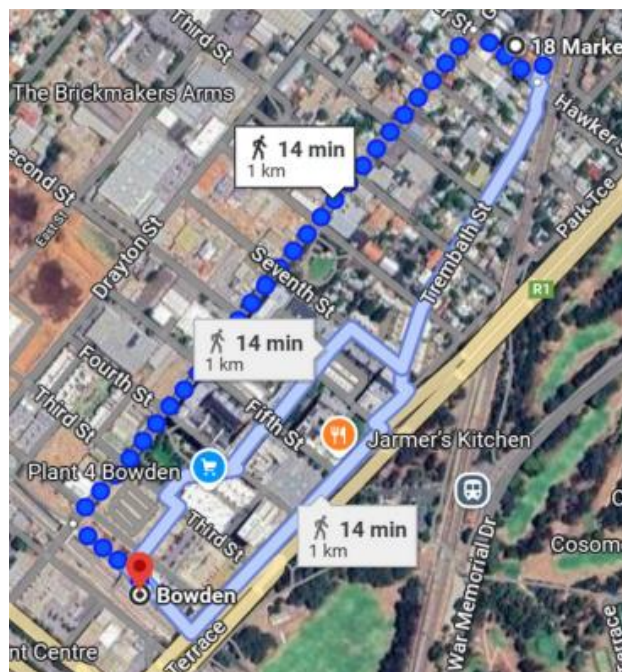


Image 4. Screen capture of the Google Maps distance from the proposed development to the Bowden Railway Station.

Proximity to Services

With the lack of parking infrastructure for motor vehicles and bicycles, as well as the significant reliance on public transportation and walking, it is important to consider the distance to essential services for the potential residents of these developments. Below are common services for residents and the travel times to the nearest available locations:

- ❖ Grocery stores:
 - IGA at Plant 4 Bowden – 1km away; no public transportation available between two locations
 - Foodland Croydon – 1. km away; accessible by bus along Hawker Street
- ❖ General Practitioner: Hindmarsh GP – 1.8km away; no public transportation available between these two locations resulting in minimum 1.1km walk
- ❖ Dentist: Adelaide Smile and Implant Centre – 1.5km away; no public transportation available between these two locations resulting in minimum 1.1km walk
- ❖ Pharmacy: Croydon – 1.9km away; accessible by bus along Hawker Street

The premise of this development is that residents will not rely on private vehicles due to easy access to high-frequency public transport. However, the actual distances to essential services—and the difficulty in accessing many of them by public transport—reveal a lack of genuine understanding of this part of Bowden and consideration for the context in which this development is proposed. This is not the walkable, well-serviced community the applicant suggests—unless one considers basic amenities to be limited to cafés, upscale pizza shops, and boutique cake stores.

General feedback

I have been a resident of Bowden/Brompton for over 16 years. In that time, I've come to deeply appreciate this community—its rich history, diverse built form, and most importantly, its people. We've seen significant changes, and while the rapid gentrification has been challenging, many of us have accepted it, recognising the need to reclaim and revitalise the industrial land near the city.

But one thing has always remained sacred: the small, precious pockets of heritage that tell our collective story. These areas are the fabric of our neighbourhood, connecting the old and the new. Unfortunately, this proposed development shows little regard for the heritage context it seeks to occupy or the community it intends to join. Rather than enhancing the area's amenity, it feels like an imposition—out of place and overbearing—on one of the last remaining connected heritage zones in Bowden. Approving it would set a dangerous precedent for further overdevelopment in the area.

As I stated at the outset, I am not opposed to social or community housing, nor to appropriate development on this site. What I oppose is *poor* development—development that shows no understanding of, or respect for, the community it's being dropped into. This is an obvious overdevelopment, and I urge the State Commission Assessment Panel to reject it in full.

Bowden has long been treated as a dumping ground for social and poorly designed housing, while more affluent inner suburbs remain untouched by this kind of planning. We are already at capacity. Yet proposals like this keep coming—simply because we’re seen as the “poor” neighbourhood. For this kind of development to be pushed into one of the few remaining heritage areas is a step too far.

And to be completely honest, if this development is approved, it will fundamentally change the character of the neighbourhood I’ve grown to love. It would force me to seriously reconsider my future here. We’ve endured a lot, but this proposal sets a deeply troubling precedent. For me—and for many others—it may well be the final straw.

Should any clarification be required, please don’t hesitate to contact me. I would welcome the opportunity to present to the State Commission Assessment Panel when *Uniting on Hawker* is considered.

Kind regards,

A handwritten signature in black ink, appearing to read 'Bethany Loates', with a stylized flourish at the end.

Bethany Loates
Owner – 109 Drayton Street, Bowden



Gawler Central

Effective 29 January 2024

This timetable covers train services linking:



High Frequency Stations



Train services:

See back cover for route descriptions



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Disclaimer

This timetable is correct at the time of publication. Adelaide Metro reserves the right to make amendments when necessary. Refer to adalaidemetro.com.au for latest timetable versions.



Ticket vending machines on trains

• Ticket Vending Machines are located in every train carriage and accept coins or EFTPOS/credit cards (with PIN) to buy a ticket or recharge your metrocard. (Machines do not accept notes or 5c pieces).

• Singletrip & Daytrip tickets are issued already validated.

• Keep your ticket until you have left the station at the end of your trip as ticket checks are conducted **every day** at Adelaide Railway Station and on a random basis at all other stations.

• You will need your ticket or metrocard to exit Adelaide Railway Station.



Route description



Gawler Central to city
via Smithfield, Elizabeth, Salisbury & Mawson Lakes.
Service operates 7 days including public holidays.



High Frequency Stations

Trains stopping at these stations offer services approximately every 15 minutes, 7:30am to 6:30pm Monday to Friday.



Bikes travel free on trains

Bicycles may be carried **FREE** on train services at the following times:

- Monday to Friday – 9:01am to 3pm and 6pm until last service
- Saturday, Sunday and public holidays – all day
- At all other times a separate concession ticket or Metrocard must be validated for bikes carried on board.

For more information visit

adalaidemetro.com.au



Gawler Central

Gawler Central to city

via Smithfield, Elizabeth, Salisbury & Mawson Lakes



Monday to Friday

AM	5:05	5:06	5:09	5:12	5:14	5:17	5:19	5:22	5:25	5:27	5:29	5:31	5:34	5:36	5:38	5:40	5:42	5:44	5:45	5:49	5:53	5:55	5:57	5:59	6:01	6:05
	5:35	5:36	5:39	5:42	5:44	5:47	5:49	5:52	5:55	5:57	5:59	6:01	6:04	6:06	6:08	6:10	6:12	6:14	6:15	6:19	6:23	6:25	6:27	6:29	6:31	6:35
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Gawler Central

Gawler Central to city
via Smithfield, Elizabeth, Salisbury & Mawson Lakes



Monday to Friday (continued)

PM	Gawler Central	Gawler Oval	Gawler	Evanston	Tambelin	Kudla	Munno Para	Smithfield Inter-change	Broadmeadows	Elizabeth Inter-change	Elizabeth South	Nurlutta	Salisbury Inter-change	Chidda	Parafield	Parafield Gardens	Greenfields	Mawson Inter-change	Dry Creek	Kilburn	Islington	Dudley Park	Ovingham	North Adelaide	Adelaide
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7:25	7:26	7:29	7:32	7:34	7:37	7:39	7:42	7:45	7:45	7:49	7:51	7:54	7:56	7:58	8:00	8:02	8:04	8:05	8:09	8:13	8:15	8:17	8:19	-	8:25
7:55	7:56	7:59	8:02	8:04	8:07	8:09	8:12	8:15	8:15	8:19	8:21	8:24	8:26	8:28	8:30	8:32	8:34	8:35	8:39	8:43	8:45	8:47	8:49	-	8:55
8:25	8:26	8:29	8:32	8:34	8:37	8:39	8:42	8:45	8:45	8:49	8:51	8:54	8:56	8:58	9:00	9:02	9:04	9:05	9:09	9:13	9:15	9:17	9:19	-	9:25
8:55	8:56	8:59	9:02	9:04	9:07	9:09	9:12	9:15	9:15	9:19	9:21	9:24	9:26	9:28	9:30	9:32	9:34	9:35	9:39	9:43	9:45	9:47	9:49	-	9:55
9:25	9:26	9:29	9:32	9:34	9:37	9:39	9:42	9:45	9:45	9:49	9:51	9:54	9:56	9:58	10:00	10:02	10:04	10:05	10:09	10:13	10:15	10:17	10:19	-	10:25
9:55	9:56	9:59	10:02	10:04	10:07	10:09	10:12	10:15	10:15	10:19	10:21	10:24	10:26	10:28	10:30	10:32	10:34	10:35	10:39	10:43	10:45	10:47	10:49	-	10:55
10:25	10:26	10:29	10:32	10:34	10:37	10:39	10:42	10:45	10:45	10:49	10:51	10:54	10:56	10:58	11:00	11:02	11:04	11:05	11:09	11:13	11:15	11:17	11:19	-	11:25
10:55	10:56	10:59	11:02	11:04	11:07	11:09	11:12	11:15	11:15	11:19	11:21	11:24	11:26	11:28	11:30	11:32	11:34	11:35	11:39	11:43	11:45	11:47	11:49	-	11:55
11:25	11:26	11:29	11:32	11:34	11:37	11:39	11:42	11:45	11:45	11:49	11:51	11:54	11:56	11:58	12:00	12:02	12:04	12:05	12:09	12:13	12:15	12:17	12:19	-	12:25



High Frequency Stations

Trains stopping at these stations offer services approximately every 15 minutes, 7:30am to 6:30pm Monday to Friday.



See other side for city to Gawler
Central timetable and route map →



Gawler Central

Gawler Central to city

via Smithfield, Elizabeth, Salisbury & Mawson Lakes



Saturday, Sunday & public holidays

AM	6:25	6:26	6:29	6:32	6:34	6:37	6:39	6:42	6:45	6:47	6:49	6:51	6:54	6:56	6:58	7:00	7:02	7:04	7:05	7:09	7:13	7:15	7:17	7:19	7:25
	6:55	6:56	6:59	7:02	7:04	7:07	7:09	7:12	7:15	7:17	7:19	7:21	7:24	7:26	7:28	7:30	7:32	7:34	7:35	7:39	7:43	7:45	7:47	7:49	7:55
	7:25	7:26	7:29	7:32	7:34	7:37	7:39	7:42	7:45	7:47	7:49	7:51	7:54	7:56	7:58	8:00	8:02	8:04	8:05	8:09	8:13	8:15	8:17	8:19	8:25
	7:55	7:56	7:59	8:02	8:04	8:07	8:09	8:12	8:15	8:17	8:19	8:21	8:24	8:26	8:28	8:30	8:32	8:34	8:35	8:39	-	-	-	-	8:52
	8:25	8:26	8:29	8:32	8:34	8:37	8:39	8:42	8:45	8:47	8:49	8:51	8:54	8:56	8:58	9:00	9:02	9:04	9:05	9:09	9:13	9:15	9:17	9:19	9:25
	8:55	8:56	8:59	9:02	9:04	9:07	9:09	9:12	9:15	9:17	9:19	9:21	9:24	9:26	9:28	9:30	9:32	9:34	9:35	9:39	-	-	-	-	9:52
	9:25	9:26	9:29	9:32	9:34	9:37	9:39	9:42	9:45	9:47	9:49	9:51	9:54	9:56	9:58	10:00	10:02	10:04	10:05	10:09	10:13	10:15	10:17	10:19	10:25
	9:55	9:56	9:59	10:02	10:04	10:07	10:09	10:12	10:15	10:17	10:19	10:21	10:24	10:26	10:28	10:30	10:32	10:34	10:35	10:39	-	-	-	-	10:52
	10:25	10:26	10:29	10:32	10:34	10:37	10:39	10:42	10:45	10:47	10:49	10:51	10:54	10:56	10:58	11:00	11:02	11:04	11:05	11:09	11:13	11:15	11:17	11:19	11:25
	10:55	10:56	10:59	11:02	11:04	11:07	11:09	11:12	11:15	11:17	11:19	11:21	11:24	11:26	11:28	11:30	11:32	11:34	11:35	11:39	-	-	-	-	11:52
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PM	12:25	12:26	12:29	12:32	12:34	12:37	12:39	12:42	12:45	12:47	12:49	12:51	12:54	12:56	12:58	1:00	1:02	1:04	1:05	1:09	1:13	1:15	1:17	1:19	1:25
	12:55	12:56	12:59	1:02	1:04	1:07	1:09	1:12	1:15	1:17	1:19	1:21	1:24	1:26	1:28	1:30	1:32	1:34	1:35	1:39	-	-	-	-	1:52
	1:25	1:26	1:29	1:32	1:34	1:37	1:39	1:42	1:45	1:47	1:49	1:51	1:54	1:56	1:58	2:00	2:02	2:04	2:05	2:09	2:13	2:15	2:17	2:19	2:25
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	2:55	2:56	2:59	3:02	3:04	3:07	3:09	3:12	3:15	3:17	3:19	3:21	3:24	3:26	3:28	3:30	3:32	3:34	3:35	3:39	-	-	-	-	3:52
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	3:55	3:56	3:59	4:02	4:04	4:07	4:09	4:12	4:15	4:17	4:19	4:21	4:24	4:26	4:28	4:30	4:32	4:34	4:35	4:39	-	-	-	-	4:52
	4:25	4:26	4:29	4:32	4:34	4:37	4:39	4:42	4:45	4:47	4:49	4:51	4:54	4:56	4:58	5:00	5:02	5:04	5:05	5:09	5:13	5:15	5:17	5:19	5:25
	4:55	4:56	4:59	5:02	5:04	5:07	5:09	5:12	5:15	5:17	5:19	5:21	5:24	5:26	5:28	5:30	5:32	5:34	5:35	5:39	-	-	-	-	5:52
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High Frequency Stations

Trains stopping at these stations offer services approximately every 15 minutes, 7:30am to 6:30pm Monday to Friday.



See other side for city to Gawler
Central timetable and route map →



Gawler Central

City to Gawler Central

via Mawson Lakes, Salisbury, Elizabeth & Smithfield

	North Adelaide	Ovingham	Dudley Park	Islington	Kilburn	Dry Creek	Mawson Inter-change	Green-fields	Parafield Gardens	Parafield	Chidda	Salisbury Inter-change	Nurlutta	Elizabeth South	Elizabeth Inter-change	Womma	Broad-meadows	Smithfield Inter-change	Munno Para	Kudla	Tambelin	Evanston	Gawler	Gawler Oval	Gawler Central	
Monday to Friday																										
AM	6:03	6:07	6:09	6:11	6:13	6:15	6:18	6:22	6:24	6:26	6:28	6:30	6:32	6:34	6:37	6:39	6:41	6:43	6:46	6:48	6:51	6:54	6:56	7:02	7:04	7:06
	6:33	6:37	6:39	6:41	6:43	6:45	6:48	6:52	6:54	6:56	6:58	7:00	7:02	7:04	7:07	7:09	7:11	7:13	7:16	7:18	7:21	7:24	7:26	7:29	-	-
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7:37	7:39	7:41
	6:53	6:57	6:59	7:01	7:03	-	-	7:10	7:12	7:14	7:16	-	7:19	7:21	7:24	7:26	-	-	7:31	7:33	7:36	7:39	-	7:43	-	-
	7:08	-	-	-	7:16	7:18	7:21	7:25	-	7:30	7:32	7:34	-	7:38	7:40	7:42	7:44	7:47	-	-	7:54	7:56	7:59	8:01	8:03	-
	7:23	7:27	7:29	7:31	7:33	-	-	7:40	7:42	7:44	7:46	-	7:49	7:51	7:54	7:56	-	-	8:01	8:03	8:06	8:09	-	8:13	-	-
	7:38	-	-	-	7:46	7:48	7:51	7:55	-	-	8:00	8:02	8:04	-	8:08	8:10	8:12	8:14	8:17	8:19	-	8:24	8:26	8:29	8:31	8:33
	7:51	-	-	-	-	-	-	-	-	-	-	-	8:12	-	-	-	-	-	-	-	-	-	-	-	-	-
	7:53	7:57	7:59	8:01	8:03	-	-	8:10	8:12	8:14	8:16	-	8:19	8:21	8:24	8:26	-	-	8:31	8:33	8:36	8:39	8:43	8:46	-	-
	8:08	-	-	-	8:16	8:18	8:21	8:25	-	8:30	8:32	8:34	-	8:38	8:40	8:42	8:44	8:47	-	-	8:54	8:56	8:59	9:01	9:03	-
	8:23	8:27	8:29	8:31	8:33	-	-	8:40	8:42	8:44	8:46	-	8:49	8:51	8:54	8:56	-	-	9:01	9:03	9:06	9:09	-	9:13	-	-
	8:38	-	-	-	8:46	8:48	8:51	8:55	-	-	9:00	9:02	9:04	-	9:08	9:10	9:12	9:14	9:17	-	9:24	9:26	9:29	9:31	9:33	-
	8:53	8:57	8:59	9:01	9:03	-	-	9:10	9:12	9:14	9:16	-	9:19	9:21	9:24	9:26	-	-	9:31	9:33	9:36	9:39	-	9:43	-	-
	9:08	-	-	-	9:16	9:18	9:21	9:25	-	9:30	9:32	9:34	-	9:40	9:42	9:44	9:47	-	-	9:54	9:56	9:59	10:01	10:03	-	-
	9:23	-	9:29	9:31	9:33	-	-	9:40	9:42	9:44	9:46	-	9:49	9:51	9:54	9:56	-	-	10:01	10:03	10:06	10:09	-	10:13	-	-
	9:38	-	-	-	9:46	9:48	9:51	9:55	-	10:00	10:02	10:04	-	10:10	10:12	10:14	10:17	-	-	10:24	10:26	10:29	10:31	10:33	-	-
	9:53	-	9:59	10:01	10:03	-	-	10:10	10:12	10:14	10:16	-	10:19	10:21	10:24	10:26	-	-	10:31	10:33	10:36	10:39	-	10:43	-	-
	10:08	-	-	-	10:16	10:18	10:21	10:25	-	10:30	10:32	10:34	-	10:40	10:42	10:44	10:47	-	-	10:54	10:56	10:59	11:01	11:03	-	-
	10:23	-	10:29	10:31	10:33	-	-	10:40	10:42	10:44	10:46	-	10:49	10:51	10:54	10:56	-	-	11:01	11:03	11:06	11:09	-	11:13	-	-
	10:38	-	-	-	10:46	10:48	10:51	10:55	-	-	11:00	11:02	11:04	-	11:10	11:12	11:14	11:17	-	11:24	11:26	11:29	11:31	11:33	-	-
	10:53	-	10:59	11:01	11:03	-	-	11:10	11:12	11:14	11:16	-	11:19	11:21	11:24	11:26	-	-	11:31	11:33	11:36	11:39	-	11:43	-	-
	11:08	-	-	-	11:16	11:18	11:21	11:25	-	11:30	11:32	11:34	-	11:40	11:42	11:44	11:47	-	-	11:54	11:56	11:59	12:01	12:03	-	-
	11:23	-	11:29	11:31	11:33	-	-	11:40	11:42	11:44	11:46	-	11:49	11:51	11:54	11:56	-	-	12:01	12:03	12:06	12:09	-	12:13	-	-
	11:38	-	-	-	11:46	11:48	11:51	11:55	-	-	12:00	12:02	12:04	-	12:10	12:12	12:14	12:17	-	-	12:24	12:26	12:29	12:31	12:33	-
PM	11:53	-	11:59	12:01	12:03	-	-	12:10	12:12	12:14	12:16	-	12:19	12:21	12:24	12:26	-	-	12:31	12:33	12:36	12:39	-	12:43	-	-
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	12:23	-	12:29	12:31	12:33	-	-	12:40	12:42	12:44	12:46	-	12:49	12:51	12:54	12:56	-	-	1:01	1:03	1:06	1:09	-	1:13	-	-
	12:38	-	-	-	12:46	12:48	12:51	12:55	-	1:00	1:02	1:04	-	1:10	1:12	1:14	1:17	-	-	1:24	1:26	1:29	1:31	1:33	-	-
	12:53	-	12:59	1:01	1:03	-	-	1:10	1:12	1:14	1:16	-	1:19	1:21	1:24	1:26	-	-	1:31	1:33	1:36	1:39	-	1:43	-	-
	1:08	-	-	-	1:16	1:18	1:21	1:25	-	1:30	1:32	1:34	-	1:40	1:42	1:44	1:47	-	-	1:54	1:56	1:59	2:01	2:03	-	-
	1:23	-	1:29	1:31	1:33	-	-	1:40	1:42	1:44	1:46	-	1:49	1:51	1:54	1:56	-	-	2:01	2:03	2:06	2:09	-	2:13	-	-
	1:38	-	-	-	1:46	1:48	1:51	1:55	-	2:00	2:02	2:04	-	2:10	2:12	2:14	2:17	-	-	2:24	2:26	2:29	2:31	2:33	-	-
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2:08	-	-	-	2:16	2:18	2:21	2:25	-	2:30	2:32	2:34	-	2:40	2:42	2:44	2:47	-	-	2:54	2:56	2:59	3:01	3:03	-	-	
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Monday to Friday



High Frequency Stations

Trains stopping at these stations offer services approximately every 15 minutes, 7:30am to 6:30pm Monday to Friday.



Gawler Central

City to Gawler Central

via Mawson Lakes, Salisbury, Elizabeth & Smithfield



Monday to Friday (continued)

PM	2:38	-	-	2:46	2:48	2:51	2:55	-	3:00	3:02	3:04	-	-	3:10	3:12	3:14	3:17	-	-	3:24	3:26	3:29	3:31	3:33
2:53	-	2:59	3:01	3:03	-	-	3:10	3:12	3:16	-	3:19	3:21	3:24	3:26	-	-	3:31	3:33	-	3:36	3:39	3:43	3:46	-
3:08	-	-	-	3:16	3:18	3:21	3:25	-	3:30	3:32	3:34	-	-	3:40	3:42	3:44	3:47	-	-	3:54	3:56	3:59	4:01	4:03
3:23	3:27	3:29	3:31	3:33	-	-	3:40	3:42	3:46	-	3:49	3:51	3:54	3:56	-	-	4:01	4:03	-	4:06	4:09	-	4:13	-
3:38	-	-	-	3:46	3:48	3:51	3:55	-	4:00	4:02	4:04	-	-	4:10	4:12	4:14	4:17	-	-	4:24	4:26	4:29	4:31	4:33
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4:08	-	-	-	4:16	4:18	4:21	4:25	-	4:30	4:32	4:34	-	-	4:40	4:42	4:44	4:47	-	-	4:54	4:56	4:59	5:01	5:03
4:23	4:27	4:29	4:31	4:33	-	-	4:40	4:42	4:46	-	4:49	4:51	4:54	4:56	-	-	5:01	5:03	-	5:06	5:09	-	5:13	-
4:38	-	-	-	4:46	4:48	4:51	4:55	-	5:00	5:02	5:04	-	-	5:10	5:12	5:14	5:17	-	-	5:24	5:26	5:29	5:31	5:33
4:53	4:57	4:59	5:01	5:03	-	-	5:10	5:12	5:16	-	5:19	5:21	5:24	5:26	-	-	5:31	5:33	-	5:36	5:39	-	5:43	-
5:05	-	-	-	-	-	-	5:20	-	-	-	5:26	-	-	5:33	-	-	5:39	-	-	-	-	5:51	5:53	5:55
5:08	-	-	-	5:16	5:18	5:21	5:25	-	5:30	5:32	5:34	-	-	5:40	5:42	5:44	5:47	-	-	5:54	5:56	5:59	-	-
5:20	-	-	-	-	-	-	5:35	-	-	-	5:41	-	-	5:48	-	-	5:54	-	-	-	-	6:03	6:05	6:07
5:23	5:27	5:29	5:31	5:33	-	-	5:40	5:42	5:46	-	5:49	5:51	5:54	5:56	-	-	6:01	6:03	-	6:06	6:09	-	6:13	-
5:35	-	-	-	-	-	-	5:50	-	-	-	5:56	-	-	6:03	-	-	6:09	-	-	-	-	6:18	6:20	6:22
5:38	-	-	-	5:46	5:48	5:51	5:55	-	-	-	6:00	-	-	6:10	6:12	6:14	6:17	-	-	6:24	6:26	6:29	-	-
5:53	5:57	5:59	6:01	6:03	-	-	6:10	6:12	6:16	-	6:19	6:21	6:24	6:26	-	-	6:31	6:33	-	6:36	6:39	-	6:43	6:47
6:08	-	-	-	6:16	6:18	6:21	6:25	-	6:30	6:32	6:34	-	-	6:40	6:42	6:44	6:47	-	-	6:54	6:56	6:59	7:01	7:03
6:23	6:27	6:29	6:31	6:33	-	-	6:40	6:42	6:46	-	6:49	6:51	6:54	6:56	-	-	7:01	7:03	-	7:06	7:09	-	7:13	-
6:38	-	-	-	6:46	6:48	6:51	6:55	-	7:00	7:02	7:04	-	-	7:10	7:12	7:14	7:17	-	-	7:24	7:26	7:29	7:31	7:33
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7:20	-	7:25	7:27	7:29	7:31	7:34	7:38	7:40	7:42	7:44	7:46	7:48	7:50	7:53	7:55	7:57	8:02	8:04	8:07	8:10	8:12	8:15	8:17	8:19
7:50	-	7:55	7:57	7:59	8:01	8:04	8:08	8:10	8:12	8:14	8:16	8:18	8:20	8:23	8:25	8:27	8:29	8:32	8:34	8:37	8:40	8:42	8:45	8:49
8:20	-	8:25	8:27	8:29	8:31	8:34	8:38	8:40	8:42	8:44	8:46	8:48	8:50	8:53	8:55	8:57	8:59	9:02	9:04	9:07	9:10	9:12	9:15	9:19
8:50	-	8:55	8:57	8:59	9:01	9:04	9:08	9:10	9:12	9:14	9:16	9:18	9:20	9:23	9:25	9:27	9:29	9:32	9:34	9:37	9:40	9:42	9:45	9:49
9:20	-	9:25	9:27	9:29	9:31	9:34	9:38	9:40	9:42	9:44	9:46	9:48	9:50	9:53	9:55	9:57	9:59	10:02	10:04	10:07	10:10	10:12	10:15	10:19
9:50	-	9:55	9:57	9:59	10:01	10:04	10:08	10:10	10:12	10:14	10:16	10:18	10:20	10:23	10:25	10:27	10:29	10:32	10:34	10:37	10:40	10:42	10:45	10:49
10:20	-	10:25	10:27	10:29	10:31	10:34	10:38	10:40	10:42	10:44	10:46	10:48	10:50	10:53	10:55	10:57	10:59	11:02	11:04	11:07	11:10	11:12	11:15	11:19
10:50	-	10:55	10:57	10:59	11:01	11:04	11:08	11:10	11:12	11:14	11:16	11:18	11:20	11:23	11:25	11:27	11:29	11:32	11:34	11:37	11:40	11:42	11:45	11:49
11:20	-	11:25	11:27	11:29	11:31	11:34	11:38	11:40	11:42	11:44	11:46	11:48	11:50	11:53	11:55	11:57	11:59	12:02	12:04	12:07	12:10	12:12	12:15	12:19
11:50	-	11:55	11:57	11:59	12:01	12:04	12:08	12:10	12:12	12:14	12:16	12:18	12:20	12:23	12:25	12:27	12:29	12:32	12:34	12:37	12:40	12:42	12:45	12:49



High Frequency Stations

Trains stopping at these stations offer services approximately every 15 minutes, 7:30am to 6:30pm Monday to Friday.



See other side for Gawler Central to city timetable →



Trains stopping at these stations offer services approximately every 15 minutes, 7:30am to 6:30pm Monday to Friday.



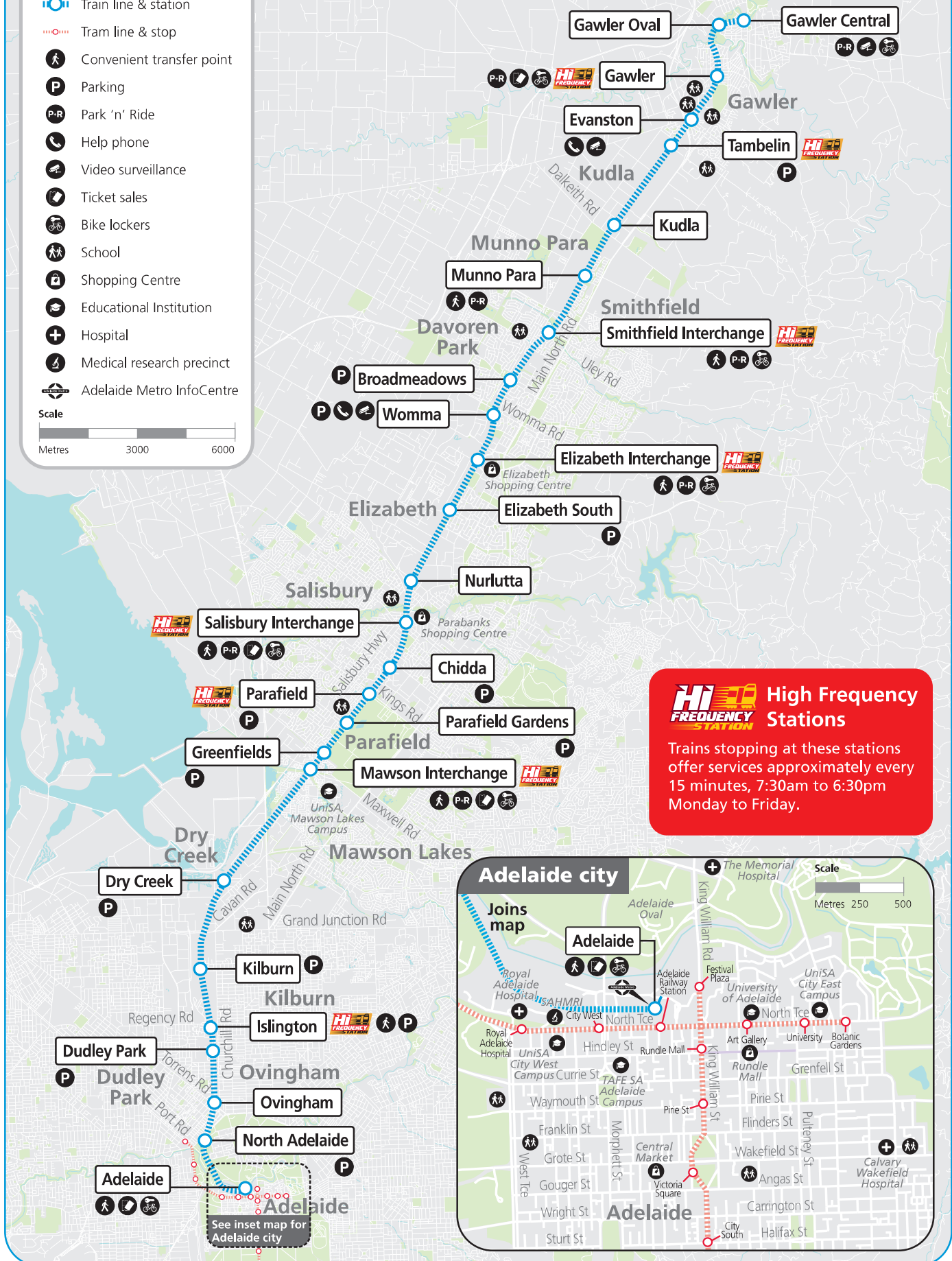
Gawler Central

Legend

- Train line & station
- Tram line & stop
- Convenient transfer point
- Parking
- Park 'n' Ride
- Help phone
- Video surveillance
- Ticket sales
- Bike lockers
- School
- Shopping Centre
- Educational Institution
- Hospital
- Medical research precinct
- Adelaide Metro InfoCentre

Scale

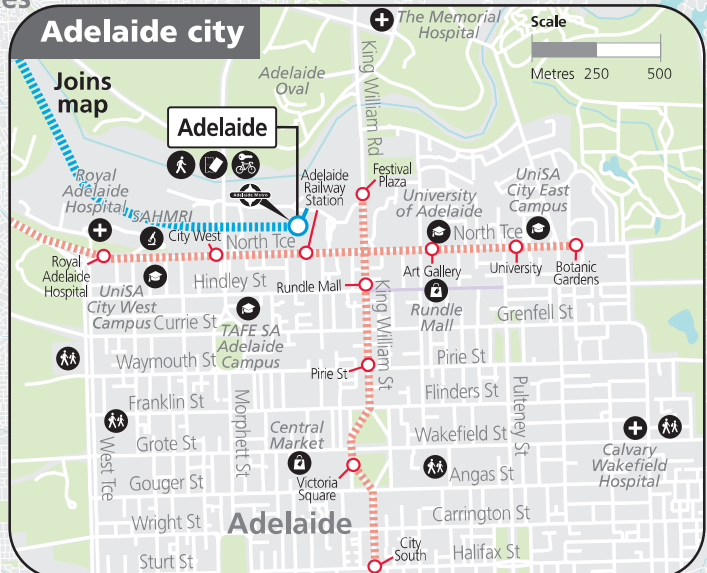
Metres 3000 6000



High Frequency Stations

Trains stopping at these stations offer services approximately every 15 minutes, 7:30am to 6:30pm Monday to Friday.

Adelaide city



Representations

Representor 38 - Craig Auricht

Name	Craig Auricht
Address	22 Tenth Street BOWDEN SA, 5007 Australia
Submission Date	08/05/2025 12:08 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	

Attached Documents

DA-24024441-Submission-from-Craig-Auricht-1497673.pdf

Objection to Development Application DA 42024441 – Uniting on Hawker

To: The Relevant Assessment Panel / Planning Authority

Applicant: Uniting SA Ltd

I wish to lodge a formal objection to Development Application DA 42024441 – Uniting on Hawker. This proposal fails to meet several critical criteria established under the Planning and Design Code for this location. The assessment of this application must be held to the same rigorous standards that apply to any development within this zone.

My specific grounds for objection are as follows:

Excessive Residential Density

The proposed development substantially exceeds the permitted density for this zone, resulting in overdevelopment that is inconsistent with the established and intended character of the neighbourhood.

Loss of Established Tree Canopy

The removal of significant tree canopy undermines local environmental objectives, including the enhancement of urban greening, biodiversity, and heat mitigation in one of the hottest suburbs within the council area.

Non-Compliance with Height Restrictions

The proposed building height exceeds the prescribed maximum and is visually intrusive when viewed in the context of the surrounding built form.

Unsafe Vehicular Access/Egress

The proposed vehicular entry and exit points on Hawker Street present serious safety concerns due to traffic volume, line-of-sight limitations, and existing road conditions.

Inappropriate Housing Typology

The proposal introduces an apartment-style built form that is not appropriate for this site. A development consistent with the Code would comprise a maximum of 12 dwellings in a house or townhouse configuration.

Failure to Respect Visual Amenity and Local Character

The architectural style and massing of the development are wholly unsympathetic to the surrounding residential context. The proposal does not integrate visually or materially with the prevailing neighbourhood character.

In conclusion, the development in its current form is fundamentally inconsistent with the Planning and Design Code and should not be approved. I respectfully request that the Panel refuse this application or require substantial amendments that bring it into compliance with the applicable planning framework and community expectations.

Yours sincerely,

Craig Auricht

[24 Tenth St Bowden SA 5007](#)

7/5/2025

Representations

Representor 39 - Amit Malik

Name	Amit Malik
Address	41 Gilbert Street OVINGHAM SA, 5082 Australia
Submission Date	08/05/2025 05:50 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 am writing to formally object to the planning proposal for Application 24024441, submitted by Uniting SA Ltd, for the development at 105 Gibson St, Bowden, SA 5007. Upon reviewing the proposal, I have identified several significant issues that do not comply with the established planning and heritage guidelines:

- Historical Overlay Rules:** The proposed development is a two-storey building, which is not permissible under the historical overlay rules for this area. The guidelines clearly state that only single-storey buildings are allowed to maintain the historical character of the neighbourhood.
- Established Neighbourhood Zoning Rules:** The site is not zoned for a very high number of dwellings as compared to the area. The current proposal exceeds this limit, which is a direct violation of the zoning regulations.
- Facade and Building Design:** The design of the facades and the overall building does not meet the heritage overlay requirements. The proposed structures do not align with the historical aesthetics and character of the area. Even there are balconies proposed in the building which has been not allowed as per historic character and violates the historic area.
- Height Restriction:** The maximum height allowed in this zone is 6 meters, whereas the proposed development is 8 meters high, which is a clear violation of the historical criteria. My recent development was initially refused due to height restrictions. Additionally, I would like to highlight my personal experience with a recent development application. My proposal was not allowed for including a balcony, and I was required to move the second story a few meters behind the ground floor, incurring significant additional costs. The dwelling was also mandated to appear as a single-storey structure from the front. It is perplexing and unfair that while individual homeowners like myself are held to stringent standards, a business entity is seemingly allowed to contravene these rules. I seek clarification on whether different rules apply to businesses, allowing them to disregard the historical character of the area. If this proposal is approved, will the council compensate me for the extra costs I incurred to comply with the historical laws? I urge the State Planning Commission to reject this application to preserve the integrity and historical character of our neighborhood. Thank you for considering my objection.

Attached Documents

Representations

Representor 40 - Monika Malik

Name	Monika Malik
Address	41 Gilbert Street OVINGHAM SA, 5082 Australia
Submission Date	08/05/2025 06:06 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 opposing the Development Application 24024441, submitted by Uniting SA Ltd, for the proposed construction at 105 Gibson Street, Bowden & 12 Market Place, Bowden SA 5007 After thoroughly reviewing the proposal, I believe the development fails to comply with several critical planning controls, including those set out under the ChSt2 – Ovingham Historic Area Statement, and presents a direct threat to the historical integrity and character of the neighborhood. The proposal includes a two-story building, which is in clear contradiction to the height restrictions outlined in the ChSt2 guidelines. These rules are in place to preserve the single-story streetscape and historic character of the area. Allowing a two-story development here would disregard the planning intent of the historic area and set a dangerous precedent. In addition, the site is currently zoned to accommodate 24 dwellings. The proposal exceeds this limit, constituting a breach of the established neighborhood zoning controls that exist to maintain balanced density and liveability in Bowden. The building's design and facade are also incompatible with the architectural style and heritage values defined in the ChSt2 statement. The proposed structures deviate from the materials, scale, and visual harmony expected in this precinct. I would also like to draw attention to my own recent experience with development compliance. As a property owner in the area, I was required to strictly adhere to the council's planning expectations. In my case, I was denied approval for a modest balcony, instructed to set the upper-level several meters behind the ground floor, and required to ensure that the home appeared as a single-story dwelling from the street. Furthermore, I was held to a strict 6-metre height restriction and had to design a roof so flat and inaccessible that it would not permit even basic maintenance access. These changes resulted in substantial additional costs. In this request, it has been proposed the height of the building up to 2 meters, which is more than a 33% height increase as per ChSt2 regulation. Given these personal experiences, I am troubled by what appears to be a double standard. Is there a separate set of rules for commercial developers that allows them to override the very guidelines the rest of us must follow? If so, will the council offer compensation to those of us who incurred costs complying with rules that are not being uniformly enforced? For the sake of consistency, heritage preservation, and community trust, I strongly urge the State Planning Commission to reject this proposal in its current form. If developments of this nature are permitted, it calls into question the purpose of the ChSt2 – Ovingham Historic Area Statement. In that case, it may be more transparent to remove the area from the historic designation entirely and allow unrestricted construction based solely on financial capacity.

Attached Documents

Representations

Representor 41 - Helen Sutherland

Name	Helen Sutherland
Address	130 Gibson Street BOWDEN SA, 5007 Australia
Submission Date	08/05/2025 07:46 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

Please find attached my comments on Development Application 24024441 by Uniting SA Ltd, for the development of 30 residential flats earmarked for community housing. I believe this development application should be declined consent. My understanding is that the proposal falls substantially short of the Planning and Design Code requirements in a range of fundamental areas. The proposed development would be an egregious overdevelopment of the site. While I am supportive of the need for community housing, this is not an appropriate site for the proposed development.

Attached Documents

Representation-in-relation-to-Development-Application-24024441-May-2025-Helen-Sutherland-1497904.pdf

Comments on Development Application 24024441

RE: Application 24024441 by Uniting SA Ltd, for the development of 30 residential flats earmarked for community housing.

I believe this development application should be declined consent.

My understanding is that the proposal falls substantially short of the Planning and Design Code requirements in a range of fundamental areas.

While I am supportive of the need for community housing, this is not an appropriate site for the proposed development.

The proposed development would be an egregious overdevelopment of the site.

Additionally, there is a significant amount of existing social housing in the immediate area. This includes a halfway house for men on the corner of Gibson Street and Hawker Street which is often the source of antisocial behaviour in the area. I am concerned about the proposed development establishing a facility for women less than 100 metres away from a facility for men – this seems to represent a high likelihood of exposing vulnerable people to more trauma, and/or increasing antisocial behaviour in our community.

I have lived on Gibson Street in Bowden, between Hawker Street and Thirteenth Street, for more than 10 years. I value the community we have built and nurtured over that time, which includes residents of existing community housing in the area. I believe the proposed development would substantially impact on our quality of life, as well as provide poor quality of living to residents of the proposed development. It will also negatively impact on the character and amenity of the area.

My key concerns are:

- **Density and overdevelopment**

- The proposed development represents a significant increase in density from the existing 9 residences, each comprising 1-2 bedrooms, to 30 2-bedroom residences in the same footprint. This is an increase of more than 3 times the current density. I understand it is also nearly 3 times the density required by the Planning and Design Code.

- **Height and footprint of the structure**

- The proposed development exceeds height guidelines for the area and is higher than anything else in the neighbourhood. Given the proposal shows the apartments with virtually no setback from Hawker Street, I fear this development would substantially change the streetscape of the main street, and not for the better.

- The footprint of the proposed development represents a significant reduction in greenspace, open space and soft landscaping, including the removal of 30+ established trees and plants, including at least 1 significant tree that is not listed in the application.
- **Traffic and parking**
 - The proposal readily admits that it falls short of the parking requirements. While the proposal lists reasons for this, and significant improvements have been made from the previous development application, I believe the parking provided is still less than what is required. The street parking identified for use is already being used by existing residents and visitors. In addition to regular traffic and parking required by existing residents, the surrounding streets are also already used for overflow parking to access local businesses (cafes, churches, etc).
 - The Gibson Street entry into the proposed smaller carpark represents the most dangerous aspect of this proposal. The intersection between Gibson Street and Hawker Street is already an extremely challenging intersection – with street parking available on both sides of Gibson Street, cars turning into Gibson Street from Hawker Street are forced into the centre of the road, as are cars exiting Gibson Street onto Hawker Street. Adding an ingress point for 6 additional cars here, so close to the existing intersection, will worsen the bottleneck and is an accident waiting to happen.
- **Precedents**
 - This plan, along with the previous development application submitted for this site by Uniting SA lists some of the less desirable buildings in the area as precedents that should enable further undesirable development. Basing new decisions on the poorest decisions made in the last 50-80 years of development is not the way to ensure high quality liveable spaces for all of us.
 - The many accommodations Uniting SA is requesting are not based on the planning code, but on their word – most importantly, their word that they will pick suitable tenants who will not have cars, despite evidence that car ownership is a lifeline for women facing or experiencing homelessness. These decisions cannot be controlled or policed by Plan SA, and if this development application is endorsed, Uniting SA will essentially have free rein to manage the property as they see fit.
 - If built, this development will pave the way for future developments that also contravene the code, setting a new precedent and, in doing so, also lowering the bar for our suburb and community.

Regards,

Helen Sutherland

Representations

Representor 42 - Jonathan Burke

Name	Jonathan Burke
Address	112 Drayton Street BOWDEN SA, 5007 Australia
Submission Date	08/05/2025 08:09 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 Submission via attached document	

Attached Documents

REPRESENTATION-IN-RELATION-TO-DEVELOPMENT-APPLICATION-24024441-AS-AMENDED-j.-Burke-1497907.pdf



8th May 2025

Presiding Member
State Commission Assessment Panel
State Planning Commission
Via the Plan SA Portal

Attention: Joanne Reid - Planning & Land Use Services

Dear Ms Thomas & Members,

REPRESENTATION IN RELATION TO DEVELOPMENT APPLICATION
24024441 - AS AMENDED

■ **0439 860 258**
■ www.jon-burke.com
■ jon@jon-burke.com

112 Drayton Street
Bowden SA 5007
ABN 55 762 787 980

This letter refers to the above amended Development Application. I do not wish to speak to this proposal but wish the following points to be considered by the panel.

I acknowledge the work undertaken by the Applicant to go some distance towards a more appropriate design and to address some of the issues which have created a large degree of concern in the community.

However, there are still some serious issues that I would like to highlight in relation to the revised design.

Overdevelopment, density and height

- This design is 3 times the density provided in the code for this location.
- The prevailing character of our area is single story and this project would create a harsh frontage on Hawker Street with no ability to be softened through landscaping.
- The buildings still exceed the maximum height for this location even after losing a storey.

Traffic considerations

- Having an entrance and carpark right near the corner of an extremely congested Gibson Street is something that is very courageous and *will* lead to traffic accidents and injuries.
Having an entrance so close to Hawker Street will impact anyone navigating Gibson Street, regardless of the minimalist suggested traffic guidance provided by the consultants.

A plan that shouldn't have seen the light of day

Given the range of non compliance in this second generation proposal, simply saying it could have been worse is to suggest it is a worthy plan with a few rough edges planning wise in its first iteration.

However this plan has once again been submitted to meet an outcome with no regard to the impact of the surrounding historical area or its residents.

The people who take up residence will be a significant walking distance from railway stations, will be subjected to constant traffic and rail noise and be corralled in a development that clearly has no effective open space and poor parking.

If the application is successful this time, there would appear to be very little point in having planning laws when a development can fail on so many levels and still be held up as a great outcome just because it is for a great social purpose.

I urge you to reject this plan which does not have the best interests of its intended residents at heart and even less so the surrounding community in Bowden.

I support social housing and we urge Uniting SA to look again for a location that will deliver more amenities, open space and parking to create a truly great place for the residents to live.

This proposal will forever change our historical area if it progresses and provide encouragement for future developers to go further and further away from what we genuinely believed to be settled planning laws and policies.

Do better. For us all.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jon Burke', written in a cursive style.

Jonathan Burke

Representations

Representor 43 - Rosalind Hannaford

Name	Rosalind Hannaford
Address	134 Gibson Street BOWDEN SA, 5007 Australia
Submission Date	08/05/2025 10:30 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

Application ID:24024441 Rosalind Hannaford 134 Gibson Street Bowden SA 5007 To the Application Committee, This is my second submission regarding the application 24024441 and I wish to outline my concerns regarding the revised plans. Whilst there are modifications to the original application, I do not understand why adhering to building codes has not been followed, in particular the access to the property from Gibson Street which is still too close to the Hawker Street intersection. This is a big safety concern for all who will travel in this area. While the parking has improved, it is still not compliant with the number of dwellings. The frontage from the proposed residences on Hawker Street needs to be set back further from the street. The number of residences is also a concern, as there is minimal outside area for any recreational space or for any environmental garden features. Housing needs to be more than a structure. It needs to be for the body and the soul. My other concerns relating to the new plan has to do with the aesthetics of the build. The design appears very dated and as this is the gateway to Hawker Street, greater consideration to the fencing facing Hawker Street, along with the railings of the balconies. Balcony railing needs to be less open to the street i.e. angled slats would allow more privacy, while still allowing air flow, and also would give some protection to the very hot afternoon summer sun. While the aesthetics may not be of much concern to the developers, this structure is going to have a big impact on the immediate residents and the greater Bowden community. I would like to think it was going to visually improve the area as well as provide housing but I cannot see that this is the outcome of this development. I'm in support of increasing housing and improving our living environment but this development is detrimental to the historic character of Bowden. Consequently, I cannot support this development. Yours sincerely Rosalind Hannaford

Attached Documents

Representations

Representor 44 - BRAG BRAG

Name	BRAG BRAG
Address	PO Box 176 BROMPTON SA, 5007 Australia
Submission Date	08/05/2025 11:48 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

This is a proposed overdevelopment in a small restrictive access area and is not in keeping with the principles of the SA Government's 30 year plan. The magnitude of this proposed development in what is essentially a low density compact residential area will monopolise and alter the character and fabric of this entire area and surrounds. PARKING In isolation of any other planned developments, the applicant has declared ample substitute resident and visitor parking availability in the surrounding streets up to 200 metres away. However every proposed nearby development believes that they have access to these very same parking spaces. There is a significant development application pending at 100 Drayton Street Bowden also with a parking shortfall that has already declared the very same on street car parking spaces are available to them. Both proposed developments cannot takeover all the available on street car parks in the 200 metre surrounding overlapping area leaving the existing residential community with nothing. TRAFFIC The proposed future traffic movements are guesswork. You cannot control what resident and visiting drivers will do to access and be close to their destination. It is a known fact that traffic management and planning will have errors and flaws - the human factor. The suggested traffic movements in this confined area cannot be enforced and relied upon. EMERGENCY SERVICES Have fire and ambulance services been consulted about rapid emergency access in the confined area and if so, what are the requirements. DENSITY The Development Act has clearly defined liveability for different zones and supporting heritage areas. This development proposal is not even close to what is permitted under the ACT and that alone should be reason for refusal. BUILDINGS The appearance, height, colours and locations of the built form are not in keeping with the character and amenity of this local area. This is and should remain a low rise development area. DEMOGRAPHIC Where is the consultation and focus groups with the identified incoming residents that determined that this proposed high density apartment living in this location is what they want to move into? You cannot control who will move into all of these apartments especially long term and the developer will want a return on investment so the apartments will be filled by anyone. DISABILITY DISCRIMINATION ACT The proposed high density development has internal and external staircases and winding pathways at different levels, where is the DDA compliance evaluation report supporting this build? CONSULTATION The developer has not engaged or held workshops about this sizeable development with the local community who live, work, socialise and have intimate knowledge of the area and what works and what doesn't. Many of the existing residents have lived their entire lives or significant amounts of time in the area and have valuable input to help achieve a good result for everyone. CONCLUSION Development application #24024441 is not supported and should be denied.

Attached Documents