

Details of Representations

Application Summary

Application ID	25040461
Proposal	Five-level residential flat building containing 14 dwellings, basement car parking and landscaping
Location	3 PATAWALONGA FRTG GLENELG NORTH SA 5045

Representations

Representor 1 - Mary Louise McCann

Name	Mary Louise McCann
Address	2/5 North Esplanade GLENELG NORTH SA, 5045 Australia
Submission Date	18/02/2026 08:42 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

Reasons

Refused: 1. Do not agree with application for rezoning. Our area is Zone 3 for a reason. All buildings to taper down to the weir. A 5 story dwelling of 14 units would blockout nearly all sunlight to our property gardens at number 5 North Esplanade Glenelg North. Our committee (all 4 unit holders) are extremely concerned about the proposed 5-level multi-unit dwelling and its impact on our personal privacy. We have grave concerns and believe high risks associated with such a development on the underlying water table. Such a development would need to provide 28 carparks for unit holders or if not provided have a significant impact to availability street parking in the precinct from King Street bridge down to the marina weir. We (the Committee) at 5 North Esplanade Glenelg North strongly refuse and oppose this application. Sincerely Mary Louise McCann, Presiding Officer, 5 North Esplanade Glenelg North SA 5045.

Attached Documents

Representations

Representor 2 - Michael Burdett

Name	Michael Burdett
Address	32/7 Patawalonga Ftg GLENELG NORTH SA, 5045 Australia
Submission Date	18/02/2026 04:46 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I support the development with some concerns

Reasons

I have 3 concerns with the development but otherwise support it. Concern 1: Traffic This will be an expensive clientele and as such it is likely most appartments will have 2 cars. Effectively once the visitor parking is allocated there is only one carpark per apartment which will add another dozen cars to the on street parking. With the marina across the road and other high density development already in the street the Patawalonga Frontage cannot cope with this addition. How will the developer and Council deal with this? Water: The Moorings development close by has had issues with low water pressure which has deminished significantly over the past 20 years since it was built. As a community we have added a couple of hundred apparments in Adelphi Terrace and another major high rise will open this year near by. SA Water have provided no system upgrades to cope with the demand of hundreds of new properties coming on line. The current infrastructure is already failing with the Moorings building now having below specification pressure for fire fighting as highlighted by Council's own Building Fire Safety Committee. How is this being addressed with the addition of this development??? Waste: The plans show that waste bins will traverse through a neighbouring property. They will not be able to get industrial size bins, or even residential bins down the side and then down half a dozen steps. This needs a re-think.

Attached Documents

Representations

Representor 3 - Glen and Duzette Butler

Name	Glen and Duzette Butler
Address	3/6 North Esplanade GLENELG NORTH SA, 5046 Australia
Submission Date	20/02/2026 12:09 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons Overlooking the whole of rear 6 North Esplanade gross invasion of property not to mention destroying the rear views Thought was an existing restriction on height not more than 3 stories	

Attached Documents

Representations

Representor 4 - Alan Wilkins

Name	Alan Wilkins
Address	31 The Esplanade TORQUAY VIC, 3228 Australia
Submission Date	23/02/2026 09:59 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

In examining the documents attached to this submission I would like to highlight some false statements and pictures that have been submitted regarding our apartment at 5North Esplanade . 1. page 18 East Elevation records No % residential 3 Storey Building. Our building has 4 apartment is two storey and we occupy the ground floor. 2.page 23 South East Image of No 5 North Esplanade behind No 2 Patawalonga Tce is nothing like what is there. 3. page 33 East Street Scape The Image of No 5 has three windows assuming there are 3 levels Considering that we are a two storey apartment block I believe it would be highly inappropriate to approve this structure causing shadows to our building and creating a precedent for the property at No 2 which is now for sale. This would change the whole landscape of the area. Also in looking at the design to support such a building, the foundational structures would need to be a lot deeper than any other building and therefore such foundations would penetrate the water table given the close proximity to the river and hence would create weakness in all of the foundations in the surrounding buildings.

Attached Documents

Representations

Representor 5 - Louise van der Merwe

Name	Louise van der Merwe
Address	36/8 North Esplanade GLENELG NORTH SA, 5045 Australia
Submission Date	24/02/2026 11:28 AM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development

Reasons

The large size of the building on the small land size will increase additional traffic and ongoing noise to an overbuilt area already. During the 18 years living here I have noticed the increase in traffic in the area and more importantly the noise from constant building in the area and also neighbourhood noise has increased. The view and all the privacy from my main bedroom will be affected – The room only has a sliding door that opens for fresh air and no windows. The bathroom is open plan adjoining the bedroom and therefor curtains will have to always be closed – no natural light and fresh air! The bedroom sliding door is facing south and looking at the plans the balconies of the back North/Western side of proposed building will look straight into my bedroom.

Attached Documents

Representations

Representor 6 - William Marshall

Name	William Marshall
Address	U34 8-9 North Esplanade GLENELG NORTH SA, 5045 Australia
Submission Date	26/02/2026 11:21 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

1. Height Non-Compliance The proposal comprises five levels with a height of approximately 17.75 metres, exceeding the Urban Renewal Neighbourhood (URN) Zone maximum by two levels and about 7.25 metres. This is a substantial departure from the intended built form outcomes of the Planning and Design Code. Height limits provide certainty, manage scale transitions and protect residential amenity. An exceedance of this scale cannot reasonably be considered minor and undermines the URN framework.

2. Inaccurate Contextual Analysis The Architectural Plans document (Existing Site Context) relies on surrounding buildings to justify the proposed scale, yet misstates their height. For example:

- 6 North Esplanade is four storeys, with the fourth storey within the roof space.
- 7 North Esplanade is three storeys.
- 8–9 North Esplanade is four storeys, with the fourth set back from street view.

Describing these as five-storey buildings materially overstates the prevailing context and appears to be an attempt to mislead the planning commission. The document also includes references to buildings that are in different zones, e.g. several buildings on Adelphi Terrace which are zoned for High Density. These buildings are irrelevant in the context of the proposed development.

3. Density and Site Size PO 8.1 of the URN Zone seeks medium-density housing. PO 8.2 anticipates higher-density development primarily on sites over 1,200m² with frontages greater than 35 metres. The subject site is approximately 854m² with a frontage of 21.32 metres. It falls well below the size and frontage anticipated for higher-density outcomes. The proposal reflects a higher-density form not supported by the site's dimensions and represents significant overdevelopment.

4. Siting and Setbacks While some lower-level setbacks comply, the fourth and fifth levels do not achieve required setbacks to the western boundary and include shortfalls to the northern and southern boundaries. Upper-level non-compliance increases visual bulk, dominance and overlooking. Ground-level compliance does not offset upper-level impacts.

5. Overshadowing The assessment relies on shadow diagrams for 22 December and 23 September, which do not represent peak impact. The report acknowledges winter shadowing beyond the site, including to 1C and 2 Patawalonga Frontage. Winter sunlight access is most critical, and increased height and reduced upper setbacks will intensify winter shading.

6. Hypothetical Future Development The report suggests neighbouring dwellings may be redeveloped and that a compliant future building could cause greater overshadowing. This is speculative. Assessment should be based on the existing environment, not hypothetical scenarios. The possibility of future impacts does not justify approving current non-compliance. The assertion regarding "economic lifecycle" of 2 neighbouring properties is not supported by independent evidence and is not a relevant planning consideration in assessing overshadowing or amenity impacts.

7. Privacy and Amenity Additional height and elevated upper levels increase potential overlooking into adjoining private open space and habitable room windows.

8. Precedent Approving a two-level height exceedance on a site significantly smaller than that envisaged for higher-density outcomes would set an undesirable precedent, weaken URN provisions and reduce planning certainty.

Conclusion For these reasons — height exceedance, inconsistency with density provisions, inaccurate context, upper-level setback shortfalls, winter overshadowing, privacy impacts and precedent concerns — I respectfully request that the proposal is refused..

Attached Documents

Representations

Representor 7 - Bruno Arboit

Name	Bruno Arboit
Address	28a Williams Ave ST MORRIS SA, 5068 Australia
Submission Date	28/02/2026 11:27 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

Submission to PlanSA re proposed development at 3 Patawalonga Frontage Glenelg North SA 5045 ("Proposed Development"). Application ID:25040461 Further to my telephone conversation with PlanSA on 26 February 2026, I understand that the Proposed Development is subject to the Urban Renewal Neighbourhood Zone as appearing on PlanSA website, relevant link below: <https://code.plan.sa.gov.au/home/property-details?type=valuation&sid=1257544008> Through my company, Tithe Barn Pty Ltd, I own a property nearby the Proposed Development at Unit 13/5 Patawalonga Frontage Glenelg North. I wish to raise an objection to the above development application. The grounds for my objection are as follows: 1. The area in which the Proposed Development stands is a triangle of land bounded by King St, Patawalonga Frontage and North Esplanade and is almost fully developed with homogenous design, and the residents have in the past endorsed the retention of current zoning and development parameters. 2. The Proposed Development appears to contravene the assessment provisions provided per the Urban Renewal Neighbourhood Zone in a number of areas including the following: 2.1 Building Height – the Proposed Development significantly exceeds the allowed maximum building height of 3 levels thereby intruding on neighbouring properties and in total disregard of the homogenous design of existing neighbouring buildings. 2.2 Primary Street Setback – the frontage of the Proposed Development is not sufficiently set back from primary street boundary that stipulates a minimum 3 metre setback. 2.3 Boundary Walls and Setbacks – the Boundary walls and setbacks of the Proposed Development do not adhere to zoning regulations thereby intruding on neighbouring properties. 3. The application has been made to the State Planning Commission, but there is no impediment to a complying development under the existing Council zoning. 4. The application describes the Proposed Development as comprising five floors, but this is a misconception as it comprises six floors when the basement is taken into account. 5. The 'photographic' representations at page 5 "Precinct Context Existing Overheight" and page 29 "Precedents and Materiality" appear misleading with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. The balance of samples are not appropriate comparisons as they are not in the same precinct or were developed before existing zoning regulations. 6. There is a lack of adequate landscaping. The garage 'bunker' extends from boundary to boundary a metre above ground level. This along with vehicle driveway, paths, and power transformer appear to cover 95% of the site in concrete, precluding the illustrated "11-and-12-metre trees". Reference is also made to planter boxes for individual apartments shown containing overhanging plants and foliage, but in reality such gardens are virtually impossible to maintain in coastal environments. 7. The Proposed Development includes 14 car parks in addition to 3 double car parks. There is no indication of which car parks are designated as visitor car parks. The double car parks cannot be utilised as visitor car parks or shared amongst different apartment owners as they require end to end parking. The extent of parking provided appears inadequate, particularly given that most apartment owners will likely require parking for more than one vehicle. This will force occupants and visitors to park their vehicles on the street, primarily Patawalonga Frontage, thereby adding significantly to street congestion and traffic management issues. This issue is not adequately addressed in the submission. Thank you Bruno Arboit

Attached Documents

260228-Submission-to-PlanSA-1-1589931.pdf

Submission to PlanSA re proposed development at 3 Patawalonga Frontage Glenelg North SA 5045 (“Proposed Development”). Application ID:25040461

Further to my telephone conversation with PlanSA on 26 February 2026, I understand that the Proposed Development is subject to the Urban Renewal Neighbourhood Zone as appearing on PlanSA website, relevant link below:

<https://code.plan.sa.gov.au/home/property-details?type=valuation&sid=1257544008>

Through my company, Tithe Barn Pty Ltd, I own a neighbouring property at Unit 13/5 Patawalonga Frontage Glenelg North.

I wish to raise an objection to the above development application.

The grounds for my objection are as follows:

1. The area in which the Proposed Development stands is a triangle of land bounded by King St, Patawalonga Frontage and North Esplanade and is almost fully developed with homogenous design, and the residents have in the past endorsed the retention of current zoning and development parameters.
2. The Proposed Development appears to contravene the assessment provisions provided per the Urban Renewal Neighbourhood Zone in a number of areas including the following:
 - 2.1 **Building Height** – the Proposed Development significantly exceeds the allowed maximum building height of 3 levels thereby intruding on neighbouring properties and in total disregard of the homogenous design of existing neighbouring buildings.
 - 2.2 **Primary Street Setback** – the frontage of the Proposed Development is not sufficiently set back from primary street boundary that stipulates a minimum 3 metre setback.
 - 2.3 **Boundary Walls and Setbacks** – the Boundary walls and setbacks of the Proposed Development do not adhere to zoning regulations thereby intruding on neighbouring properties.
3. The application has been made to the State Planning Commission, but there is no impediment to a complying development under the existing Council zoning.
4. The application describes the Proposed Development as comprising five floors, but this is a misconception as it comprises six floors when the basement is taken into account.

5. The 'photographic' representations at page 5 "Precinct Context Existing Overheight" and page 29 "Precedents and Materiality" appear misleading with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. The balance of samples are not appropriate comparisons as they are not in the same precinct or were developed before existing zoning regulations.
6. There is a lack of adequate landscaping. The garage 'bunker' extends from boundary to boundary a metre above ground level. This along with vehicle driveway, paths, and power transformer appear to cover 95% of the site in concrete, precluding the illustrated "11-and-12-metre trees". Reference is also made to planter boxes for individual apartments shown containing overhanging plants and foliage, but in reality such gardens are virtually impossible to maintain in coastal environments.
7. The Proposed Development includes 14 car parks in addition to 3 double car parks. There is no indication of which car parks are designated as visitor car parks. The double car parks cannot be utilised as visitor car parks or shared amongst different apartment owners as they require end to end parking. The extent of parking provided appears inadequate particularly given that most apartment owners will likely require parking for more than one vehicle. This will force occupants and visitors to park their vehicles on the street, primarily Patawalonga Frontage, thereby adding significantly to street congestion and traffic management issues. This issue is not adequately addressed in the submission.

Thank you

Bruno Arboit

Director, Tithe Barn Pty Ltd

Representations

Representor 8 - Catherine Papandrea

Name	Catherine Papandrea
Address	PO Box 380 HOVE SA, 5048 Australia
Submission Date	01/03/2026 02:09 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

Application ID: 25040461 Subject Land: 3 Patawalonga Frontage, Glenelg North, SA, 5045 Thank-you for the opportunity to present my views: 1. Overshadowing and amenity impacts The five-level structure, including basement parking, may result in increased overshadowing of neighbouring properties and public spaces, impacting residential amenity and sunlight access. Even where the proposal meets technical compliance requirements, the overall effect on neighbouring amenity may be significant, including loss of open space, reduced garden or lawn areas, and diminished streetscape quality. 2. Streetscape, visual bulk, and neighbourhood character The scale and height of the proposed building represent a substantial increase compared with surrounding dwellings. The description of floor levels is inconsistent, as it appears that the five-level proposal with basement is not fully represented in the documentation, making it difficult to accurately assess visual bulk. The limited landscaping and large areas of concrete, driveway, and garage close to boundaries may exacerbate the perceived bulk and reduce streetscape cohesion. The street currently has a consistent lower-rise scale, and the proposed building may be out of character with this established context. Residents and visitors are already experiencing such impacts from the more recently completed, under-construction, and proposed multi-story apartment developments nearby. The cumulative effect of these developments, together with the proposed building, may further affect neighborhood cohesion, streetscape character, and local amenity. The cumulative effect of the building's scale, bulk, and design may also diminish public sentiment. 3. Context and precedent The photographic and precedent examples provided in the documentation appear to reference properties outside the immediate precinct or in different zoning areas, limiting their relevance. Consideration of the immediate neighborhood context suggests that the proposed building is significantly larger than adjacent dwellings and may be considered an overdevelopment relative to the precinct. 4. Traffic, access, and parking The proposed basement and five-level building may increase vehicle movements on the street, potentially affecting traffic safety, pedestrian access. Residents and visitors are already experiencing significant increases in traffic, noise and congestion from the more recently completed and under-construction multi-story apartment developments nearby, especially the Adelphi strip and surrounds. The cumulative effect of these developments, together with the proposed building, may further impact access to the nearby shopping centres, as it is already very challenging for residents and visitors to find parking in the nearby shopping precincts. The development may also increase demand for on-street parking, which could impact availability for residents and visitors and may have safety implications for street users. 5. Landscaping and site coverage The proposal has minimal vegetation and substantial site coverage, with concrete areas, driveway, garage, and utility structures occupying the majority of the site. This may limit ecological and aesthetic benefits, reduce streetscape amenity, and conflict with the objectives of the Planning and Design Code related to landscaping, open space, and neighborhood character. 6. Stormwater and drainage impacts The extent of hard surfaces and site coverage may affect stormwater management and contribute to localized flooding or drainage issues, potentially impacting neighboring properties and street conditions, which locals have already experienced some issues. Thank you for considering my feedback.

Attached Documents

Representations

Representor 9 - Jodie Veldhoen

Name	Jodie Veldhoen
Address	3 Filmore Ave MORPHETTVILLE SA, 5043 Australia
Submission Date	01/03/2026 08:40 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 14 dwellings on this site is too many. It will cause too much congestion in the area. The parking will end up in the street as there are not enough parks onsite for the number of bedrooms. The council car park opposite is meant for visitors to the area but will end up full of the residents, which is not the intended use.	

Attached Documents

Representations

Representor 10 - David Veldhoen

Name	David Veldhoen
Address	3 FILMORE AVENUE MORPHETTVILLE SA, 5043 Australia
Submission Date	02/03/2026 07:23 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 intended development does not provide for sufficient off street parking. 14 2 double bedrooms, will mean on average tenants will have a minimum of 2 vehicles. I also question the wisdom in building a car park below the water level of the Patawalonga. This road is narrow, and a development of the nature will cause unreasonable congestion, will see the public car park used for a purpose for which it is not designed. A development of this scale should be required to provision for a minimum of 2 off street car parks like other similar developments in the area.

Attached Documents

Representations

Representor 11 - Steve Dantalis

Name	Steve Dantalis
Address	1 C Patawalonga Frontage GLENELG NORTH SA, 5045 Australia
Submission Date	03/03/2026 12:47 PM
Submission Source	Online
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons Please refer to the supporting document PDF "Objection DA 25040461 01.02.2026"	

Attached Documents

Objection-DA-25040461-01.02.2026-1590740.pdf

OBJECTION SUBMISSION

Development Application ID 25040461

Date: 1 March 2026

3 Patawalonga Frontage, Glenelg North SA 5045

To:

The State Planning Commission

GPO Box 1815

Adelaide SA 5001

From:

Steve and Theodora Dantalis

1C Patawalonga Frontage

Glenelg North SA 5045

Pages 1 to 22 for objection submission to The State Planning Commission

1. FUNDAMENTAL NON-COMPLIANCE WITH THE URBAN RENEWAL NEIGHBOURHOOD ZONE

Desired Outcome (DO 1) – URN Zone

Housing density is to increase without compromising residential amenity.

This proposal fundamentally compromises residential amenity due to excessive height, bulk, overshadowing, and visual dominance.

2. GROSS BREACH OF BUILDING HEIGHT CONTROLS – PO 2.1 & DPF 2.1

PO 2.1 – Buildings are generally 2–3 levels, with taller buildings located on sites of suitable size and dimension.

DPF 2.1 – Maximum building height:

- 11.5 metres
- 3 building levels

An exception allowing 4 levels and 15 metres applies only where:

- Site area is at least 1,200m²; and
- Site frontage is at least 35 metres.

Subject site:

- 854m²
- 21.27 metre frontage

Proposed development:

- 17.75 metres in height
- 5 building levels (excluding basement)

This exceeds the maximum permitted height by:

- Approximately 6.25 metres (54%)
- Two additional levels (67%)

The site does not qualify for the 4-level exception. There is no planning basis within the URN policy that permits a five-level building on an 854m² allotment.

This is not a minor variation. It is a substantial and fundamental departure from the height framework established under the Technical and Numeric Variation (TNV) layer.

3. MISAPPLICATION OF CONTEXTUAL PRECEDENT

The Planning Report asserts that “the horse has effectively bolted” in relation to contextual height.

This is not a recognised planning principle under the PDI Act or Planning and Design Code.

Existing buildings that exceed current URN controls:

- Were constructed prior to the current Code implementation;
- Exist under previous zoning regimes;
- Do not override current TNV height limits.

Planning law does not operate by escalation. Historical non-compliance does not justify further non-compliance.

4. EXCESSIVE DENSITY – PO 8.1 & PO 8.2

The proposal achieves approximately 164 dwellings per hectare, classified as high density.

PO 8.1 anticipates medium density for typical URN sites.

PO 8.2 anticipates higher density primarily on sites exceeding 1,200m² with wide frontages.

At 854m², this allotment is not contemplated for high-density apartment development of this scale.

5. OVERSHADOWING – DESIGN IN URBAN AREAS (PO 10.1, PO 10.2, PO 4.1, PO 4.2)

Winter overshadowing materially impacts:

- 1B Patawalonga Frontage
- 1C Patawalonga Frontage
- 2 Patawalonga Frontage

The Planning Report makes speculative and inaccurate claims that neighbouring dwellings are “nearing the end of their economic lifecycle.”

1B and 1C Patawalonga Frontage:

- Are Torrens Titled;
- Were completed in 1999;
- Are structurally modern;
- Include significant renewable energy infrastructure (13kW solar system with battery storage).

Overshadowing directly impacts:

- Residential amenity;
- Solar access;
- Financial return on renewable infrastructure;
- Property value.

PO 10.1 and PO 10.2 require development to minimise overlooking and overshadowing impacts. This proposal fails to meet that obligation.

Speculation about future redevelopment of neighbouring properties is legally irrelevant. Assessment must be based on existing lawful use.

6. DESIGN OVERLAY – MASSING AND VISUAL DOMINANCE

The site is captured by the Design Overlay and referred to the Government Architect.

PO 12.2 (Design in Urban Areas) requires development to reinforce human scale at ground level.

A five-storey façade on a 21.27 metre frontage does not represent human-scale development. The bulk and vertical dominance are inconsistent with the established 2–3 level compliant development along Patawalonga Frontage.

7. INCONSISTENCIES AND MISLEADING REPRESENTATIONS

We note several inconsistencies within the application material:

- The Stormwater Plan refers to a “4-storey” building (incorrect).
- Dwelling levels appear renumbered to minimise the perception of five levels.
- Visitor car parking calculations are inconsistent.
- Neighbouring Torrens Titles (1B and 1C) are incorrectly depicted as a single site in context drawings.
- Contextual diagrams include buildings outside the URN Zone.

These discrepancies materially affect assessment transparency and integrity.

8. CAR PARKING – TRANSPORT, ACCESS AND PARKING (TABLE 1)

Code requirements:

- 1 space per dwelling (14 spaces)
- 0.33 visitor spaces per dwelling (approximately 5 spaces)

Total theoretical demand: 19 spaces.

While 20 spaces are provided:

- 17 are allocated to residents;
- Only 3 are available for visitors.

This does not satisfy functional visitor demand.

Practical consequences include:

- Overflow into street parking;
- Increased congestion;
- Reduced on-street capacity due to widened crossover;
- Repetition of parking pressure already experienced in nearby developments.

PO 1 (Transport, Access and Parking) requires development not to adversely affect the road network. This proposal fails that objective.

9. WASTE MANAGEMENT – PO 11.1 & PO 11.3

Bulk bins are proposed to be wheeled to the kerb weekly.

This will:

- Block the roadway during collection;
- Create traffic hazards;
- Reduce neighbourhood amenity.

This is inconsistent with the URN objective of a high-quality urban neighbourhood.

10. STORMWATER MANAGEMENT OVERLAY

The finished floor level is stated as 3.25m AHD.

However:

- Height calculations appear to be measured from elevated finished levels;
- The relationship to natural ground level is not clearly documented.

Flood resilience measures cannot justify substantial exceedance of TNV height limits.

11. PRECEDENT AND CASCADING IMPACT

Approval of this development would:

- Set a vertical precedent;
- Encourage further 4–5 level proposals on undersized allotments;
- Permanently alter the established streetscape.

This is precisely what the URN height controls were designed to prevent.

12. FAILURE TO SATISFY ORDERLY AND PROPER PLANNING

Section 65 of the PDI Act requires assessment against the Planning and Design Code.

This proposal:

- Exceeds TNV height limits;
- Exceeds permitted building levels;
- Exceeds intended density;
- Causes unreasonable overshadowing;
- Fails to appropriately manage bulk and massing;
- Relies on irrelevant contextual arguments.

It therefore fails the statutory test for orderly and proper planning.

CONCLUSION

This proposal represents:

- A 54% height exceedance;
- A 67% building level exceedance;
- High-density intensity on an undersized allotment;
- Significant overshadowing impacts;
- Non-compliance with PO 2.1, DPF 2.1, PO 8.1, PO 10.1, and PO 12.2;
- Departure from Design Overlay expectations;
- Parking and infrastructure strain.

The Urban Renewal Neighbourhood Zone height and dimensional controls must be strictly enforced.

Accordingly, we respectfully request that the State Planning Commission REFUSE Development Application ID 25040461.

We further request that representatives of the Commission conduct a physical site inspection of Patawalonga Frontage (Kings Bridge to Cygnet Court) to properly assess the established streetscape character and human-scale built form.

COMPREHENSIVE DETAILED OBJECTION

TRAFFIC AND PARKING OBJECTION (FULL VERSION)

Urban Renewal Neighbourhood Zone

Prepared in response to: Traffic & Parking Report – CIRQA (Project 25200, V1.0, 11 December 2025)

This submission itemises and disputes traffic, access and parking matters raised (or omitted) in the CIRQA Traffic & Parking Report and references the Planning and Design Code (PlanSA) Transport, Access and Parking (TAP) policies, including Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) provisions.

1. 1. DOCUMENT AND ASSESSMENT SCOPE DEFICIENCIES

1.1 The CIRQA report is framed as a traffic and parking assessment, however it predominantly asserts compliance and provides limited evidence-based testing. It does not include base traffic counts, intersection modelling, queue analysis, sight distance diagrams, pedestrian conflict analysis, or seasonal/cumulative assessment.

1.2 The report references an adjacent road speed limit as '50 km/h applies on xx' (i.e., incomplete text), which indicates the report is not fully quality-checked and cannot be relied upon for statutory decision-making.

1.3 The report states the assessments are based on plans prepared by Enzo Caroscio Architecture (Drawing A2.00 dated 12 Dec 2025). This dependency means any later plan changes invalidate conclusions unless the traffic report is reissued.

Relevant Planning and Design Code references: TAP PO 2 (network function and safety not adversely affected), TAP PO 5 (safe on-site movements), and associated DTS requiring evidence of safe design.

2. 2. ROAD FUNCTION AND NETWORK CONTEXT – COLLECTOR ROAD IMPACTS

2.1 CIRQA identifies Patawalonga Frontage as a 'collector road' controlled by the City of Holdfast Bay, with an approx. 9.2 m carriageway and two-way traffic flow; parking generally unrestricted on the western side and restricted on the eastern side by yellow line marking; the southern end transitions into one-way southbound operation.

2.2 A collector road performs a distribution function and is sensitive to new crossovers, kerbside interruptions, and manoeuvring conflicts. The report does not evaluate the operational sensitivity of the one-way transition or any downstream intersections.

2.3 Under TAP PO 3 (access appropriate for road hierarchy) and TAP DTS 3.1 (access points minimise disruption and maintain safety), the applicant must demonstrate that the access arrangement will not compromise collector-road

function. The report provides no Level of Service analysis or intersection performance assessment.

2.4 The report also omits assessment of how development traffic interacts with on-street parking demand on the western side (where parking is generally unrestricted). This is critical because any shortfall in visitor parking or internal parking usability will displace demand to the street.

3. 3. TRAFFIC GENERATION AND DISTRIBUTION – INSUFFICIENT EVIDENCE

3.1 CIRQA uses TfN 'Guide to Transport Impact Assessment' rates for medium density residential dwellings (0.39 AM / 0.37 PM peak hour) and forecasts approximately 6 AM and 6 PM peak hour trips for 14 dwellings.

3.2 Under TAP PO 2, the proponent must demonstrate the development does not adversely affect safety, efficiency or function of the transport network. Generic trip rates alone do not establish compliance for this site context (coastal precinct, marina activity, beach visitation, seasonal peaks).

3.3 The development provides 20 car parks for 14 two-bedroom dwellings. This parking quantum implies higher car ownership and use than assumed by a 'medium density' generic rate. Without local census/ownership benchmarking or sensitivity testing, the 6 trips claim is not robust.

3.4 The report provides no distribution assumptions (turning movements north/south), no turning counts, and no consideration of peak overlap with beach/marina peaks or refuse collection operations.

4. 4. ACCESS ARRANGEMENTS – CROSSOVER WIDTH, LOCATION AND PEDESTRIAN CONFLICT

4.1 CIRQA proposes a 6.0 m wide two-way crossover on Patawalonga Frontage and states redundant crossovers will be reinstated as upright kerb. Under TAP PO 4 and TAP DTS 4.1, access widths should be minimised to what is necessary to operate safely and should minimise pedestrian conflict and on-street parking loss.

4.2 A 6.0 m two-way crossover increases pedestrian crossing distance across the driveway, increases the likelihood of higher entry/exit speeds, and removes kerb length that could otherwise accommodate on-street parking and verge landscaping.

4.3 The report does not provide: (a) pedestrian desire line mapping; (b) driveway sightline triangles to pedestrians/cyclists; (c) risk assessment of vehicle/pedestrian conflict given the footpath on the western side and cyclists sharing the carriageway.

4.4 The report asserts vehicles can enter/exit in forward direction. However, the safety outcome depends on real-world behaviour and sightlines; these are not demonstrated.

4.5 Under TAP PO 1 (safe and convenient access for pedestrians/cyclists) and TAP PO 4, the absence of evidence means compliance is not established.

5. 5. BASEMENT RAMP DESIGN – STEEP GRADIENT, SAFETY AND AMENITY

5.1 CIRQA states the basement ramp will have a maximum gradient of 1:4 with transitions at 1:8 and a 1:20 section for the first 6.0 m.

5.2 While CIRQA references AS/NZS 2890.1 and 2890.6, dimensional compliance does not automatically satisfy TAP PO 5 (safe on-site vehicle movements).

5.3 Steep ramps (1:4) commonly create: traction issues in wet conditions; scraping/bottoming for low-clearance vehicles; increased acceleration noise; and headlight glare spill to the street environment. None of these impacts are assessed.

5.4 The ramp cross-sections illustrate tight vertical geometry and transitions. The report does not include a sight-distance assessment at the property boundary demonstrating drivers can observe pedestrians on the footpath before crossing it.

5.5 Under TAP DTS 5.1 (parking areas comply with AS/NZS 2890 and safe manoeuvring), the applicant should provide driveway sight triangles, grade transition checks, and swept path validation for simultaneous movements (enter/exit) — not provided.

6. 6. TURN PATH ASSESSMENT – LIMITED CONDITIONS AND REAL-WORLD CONSTRAINTS

6.1 Appendix drawings show B85 and B99 vehicle paths (realistic minimum radius).

6.2 The drawings include a disclaimer that they are 'concept plan only' and 'not suitable for construction purposes'. This undermines reliance unless final design is certified and re-tested.

6.3 The turn path diagrams do not show key real-world constraints: (a) on-street parked vehicles opposite/adjacent the crossover; (b) the effect of simultaneous entry/exit; (c) driver hesitation due to pedestrian crossing; (d) service vehicles stopping kerbside for refuse collection.

6.4 Under TAP PO 5 and DTS 5.1, the assessment should demonstrate all critical user classes (including emergency/service vehicles where relevant) and operational scenarios — not shown.

7. 7. PARKING PROVISION – NUMERICAL DTS VS STRATEGIC/OPERATIONAL OUTCOMES

7.1 CIRQA applies Code rates: 1 space per two-bedroom dwelling and 0.33 visitor spaces per dwelling, concluding a theoretical requirement of 19 spaces and stating 20 spaces satisfies requirements.

7.2 Even where a DTS numeric rate is met, TAP PO 2 and PO 4 require that parking and access arrangements do not cause adverse on-street impacts or safety issues. The report does not address whether visitor spaces are dedicated, clearly signed, conveniently located, and enforceable via strata management.

7.3 The report provides no assessment of likely overflow parking to the street at peak visitation times (weekends/holiday periods) given proximity to marina/beach attractions.

7.4 The design appears to include internal constraints (plant, transformer, bicycle spaces) within a basement footprint. Without a usability assessment (turning, clearance, column placement), the claimed 20-space supply may not be fully functional in practice.

7.5 Strategic inconsistency: Urban Renewal Neighbourhood Zone Desired Outcomes (e.g., integration with movement networks and reduced car dependence) can be undermined by over-provision of parking. The report does not address how the parking strategy aligns with the Zone's movement objectives.

8. 8. BICYCLE PARKING – PARTIAL INFORMATION AND COMPLIANCE GAPS

8.1 CIRQA states the Code does not identify bicycle rates for the Zone and that nine bicycle spaces will be provided, considering this 'more than sufficient'.

8.2 Under TAP PO 6 (support active transport), provision must be safe, secure and practical. The report does not identify whether bicycle parking is secure (cage/lockers), weather-protected, accessible without conflict with vehicles, and compliant with relevant standards/guidance.

8.3 The absence of detail prevents assessment against TAP PO 6 outcomes.

9. 9. REFUSE COLLECTION AND KERBSIDE OPERATIONS – NETWORK AND SAFETY IMPACTS

9.1 CIRQA states refuse collection will be undertaken by Council's contractor; bulk bins will be wheeled to Patawalonga Frontage via a southern pathway; and no refuse vehicles will access the site.

9.2 Kerbside collection on a collector road can create temporary obstruction, lane narrowing, and visibility constraints. This is a transport impact and must be assessed under TAP PO 2.

9.3 The report does not address: where bins will be staged; whether this conflicts with the yellow line restrictions; whether collection requires truck stopping in the traffic lane; how pedestrian access is maintained; and whether there are compounded risks near the one-way transition at the southern end.

9.4 Absent this, the report does not demonstrate compliance with TAP PO 2 or TAP PO 1 (safe pedestrian movement).

10. 10. PUBLIC TRANSPORT CONTEXT – NOT A SUBSTITUTE FOR EVIDENCE

10.1 CIRQA notes bus stops within 220 m and a tram station approx. 800 m away.

10.2 While public transport proximity is relevant, it does not replace the need to assess actual vehicular impacts created by the proposed parking supply and access

design. The report does not link transport availability to a reduced parking demand justification or travel demand management measures.

11. 11. REQUIRED FURTHER INFORMATION / CONDITIONS (PLANNING POSITION)

11.1 In the absence of the missing analyses, the traffic and parking component should be considered incomplete for assessment. At minimum, the following should be required before any approval is contemplated:

- Current traffic counts on Patawalonga Frontage (weekday + weekend, AM/PM peaks, seasonal consideration).
- Intersection / access operational assessment (including queueing and sight distance) appropriate to a collector road.
- Pedestrian/cyclist conflict assessment at the crossover (sight triangles, risk controls, driveway design treatments).
- Verified swept path assessment for simultaneous entry/exit and realistic on-street parking conditions.
- Basement parking usability assessment (columns/clearances/ramps) confirming all 20 spaces are functional.
- Kerbside refuse collection impact assessment (truck stopping, sightlines, pedestrian path continuity).

11.2 If the development is approved notwithstanding the above, conditions should address: crossover narrowing where feasible; pedestrian priority treatments; driveway warning signage; lighting and drainage for ramp safety; management of visitor parking; and enforceable waste presentation arrangements.

12. 12. STATUTORY CONCLUSION (PO/DTS NON-DEMONSTRATION)

12.1 For the reasons above, the traffic and parking report does not demonstrate compliance with the following Planning and Design Code provisions (non-exhaustive):

- TAP PO 1 (safe pedestrian/cyclist access) – not demonstrated due to missing sightline/conflict evidence.
- TAP PO 2 (no adverse network impact) – not demonstrated due to lack of counts/modelling/cumulative & kerbside operations assessment.
- TAP PO 3 and DTS 3.1 (appropriate access for road hierarchy) – not demonstrated for a collector road context.
- TAP PO 4 and DTS 4.1 (minimise access conflict and width impacts) – 6.0 m crossover not justified or minimised.
- TAP PO 5 and DTS 5.1 (safe on-site manoeuvring / AS2890 interface) – ramp/exit safety and practical usability not demonstrated.
- TAP PO 6 (support active transport) – bicycle facilities not specified sufficiently to confirm outcome.

12.2 Accordingly, the traffic and parking material should be afforded limited weight and the application should not be supported on traffic grounds until the above matters are rectified.

PART – DETAILED WASTE MANAGEMENT OBJECTION (INCORPORATED IN FULL)

Prepared in response to: Waste Management Plan – CIRQA (11 December 2025)

1. 1. STRATEGIC NON-COMPLIANCE WITH PLANNING AND DESIGN CODE

The Waste Management Plan (WMP) focuses primarily on bin volumes and servicing frequency.

However, under the Planning and Design Code, waste management must also satisfy broader built form, amenity, transport, and interface Performance Outcomes.

Relevant Code provisions include:

General Development Policies – Interface Between Land Uses:

- PO 1 – Development mitigates adverse impacts on adjoining land.
- PO 3 – Development does not unreasonably detract from residential amenity (including noise, odour, visual impact).

Transport, Access and Parking (TAP):

- PO 1 – Safe pedestrian access.
- PO 2 – No adverse impact on road function.

Urban Renewal Neighbourhood Zone:

- DO 1 & DO 3 – Integrated design, high amenity, and orderly renewal.
- Performance Outcomes relating to design quality and streetscape presentation.

The WMP does not demonstrate compliance with these outcomes.

2. 2. WASTE GENERATION CALCULATION – GENERIC AND POTENTIALLY UNDERSTATED

The report applies Zero Waste SA 2014 rates (30L general waste per bedroom per week, etc.)

resulting in:

- 840 L/week general waste
- 700 L/week recycling
- 280 L/week organics

Objection:

The adopted waste generation rates are based on a 2014 guideline and may not reflect

current waste volumes for multi-storey residential developments.

No sensitivity testing has been undertaken to account for:

- Full occupancy scenarios
- Short-term rental usage (if applicable)
- Holiday/seasonal occupancy spikes (coastal location)

Under Interface PO 3, developments must not create unreasonable odour or waste overflow impacts.

If volumes are underestimated, bin overflow and kerbside spillage may occur.

3. 3. BIN STORAGE AREA – DESIGN AND AMENITY DEFICIENCIES

The WMP proposes an at-grade bin storage area on the ground floor accommodating:

- 2 × 660L general waste bins
- 3 × 660L recycling bins
- 3 × 240L organics bins

Ventilation is stated to comply with AS 1668 but no mechanical ventilation specifications are provided.

There is no:

- Odour modelling
- Acoustic assessment of bin movements
- Drainage detail for washdown
- Evidence of acoustic separation from habitable rooms

Under Interface PO 1 & PO 3, the development must mitigate noise and odour impacts.

Bulk 660L bins generate significant rolling noise, impact noise during lid operation, and early morning collection disturbance. These impacts are not assessed.

4. 4. ON-STREET BIN PRESENTATION – FAILURE TO MITIGATE PUBLIC REALM IMPACT

The WMP confirms bulk bins will be wheeled to Patawalonga Frontage and green organics bins presented by a nominated tenant. No refuse vehicle access is provided on-site.

Objection:

The proposal relies entirely on kerbside collection.

Under TAP PO 2, development must not adversely affect road function.

Kerbside collection on a collector road creates:

- Temporary traffic lane obstruction
- Pedestrian path conflict
- Reduced sightlines
- Visual clutter in streetscape

The WMP states up to three truck movements per week. This equates to weekly general waste and fortnightly recycling and organics.

The assertion that impacts are “relatively low” is not supported by traffic modelling.

No staging diagram is provided showing exact bin placement location, distance from crossover, impact on pedestrian clear path, or interaction with yellow line restrictions.

This fails to demonstrate compliance with TAP PO 1.

5. 5. TRANSFER PATHWAY LENGTH AND GRADIENT

The WMP indicates bins will be wheeled approximately 28 metres to the kerb via a southern pathway.

Objection:

A 28m transfer path increases:

- Manual handling risk
- Noise impact
- Likelihood of bins being left on street overnight

No gradient analysis is provided. If slopes or irregular surfaces exist, this creates safety and compliance issues.

Under General Development PO relating to safe and functional site design, this arrangement may not represent best practice.

6. 6. HARD WASTE MANAGEMENT – INADEQUATE PROVISION

Hard waste is to be placed kerbside using Council’s at-call service.

For 14 dwellings, hard waste events are likely to be frequent.

No designated hard waste holding area is provided.

Under Interface PO 3, visible bulk waste on the street detracts from amenity and creates vermin risk.

The proposal externalises waste impacts to the public realm.

7. 7. RELIANCE ON BEHAVIOURAL MANAGEMENT RATHER THAN DESIGN SOLUTION

The WMP assigns responsibilities to residents and building management including:

- Residents transporting waste
- Tenants presenting organics bins
- Management ensuring compliance

The Code requires design-based mitigation, not reliance on behavioural compliance.

No enforceable management framework is provided.

No strata management plan is attached.

Under Interface PO 1, mitigation must be embedded in physical design.

8. 8. VISUAL IMPACT AND STREETScape DEGRADATION

The WMP does not assess:

- Streetscape presentation on collection days
- Interaction with pedestrian access
- Impact during peak beach visitation periods

Under Urban Renewal Zone Performance Outcomes relating to high quality design, development must positively contribute to streetscape. Rows of bulk bins on collection days are inconsistent with this objective.

9. 9. CUMULATIVE IMPACT – NOT CONSIDERED

The WMP considers only this site and does not consider:

- Other apartment developments nearby
- Aggregate bin presentation on collection days
- Collector road capacity for multiple refuse stops

Under TAP PO 2, cumulative impact must be considered.

10. 10. FAILURE TO PROVIDE ALTERNATIVE WASTE STRATEGY

No assessment is provided of:

- On-site compactor systems
- Basement collection
- Private waste contractor solutions
- Enclosed on-site pickup bays

Reliance on kerbside wheeling appears to be a design compromise rather than best practice. Under Urban Renewal Desired Outcomes relating to integrated design excellence, alternative servicing strategies should be explored.

11. CONCLUSION

The Waste Management Plan:

- Relies on generic waste generation assumptions
- Externalises waste impacts to the public realm
- Fails to demonstrate compliance with Interface PO 1 & PO 3
- Fails to demonstrate compliance with TAP PO 1 & PO 2
- Relies on behavioural management rather than built-form mitigation
- Does not adequately address amenity, noise, odour or traffic impacts
- Does not consider cumulative impacts on a collector road

Accordingly, the waste management strategy does not demonstrate sufficient compliance with the Planning and Design Code and should not be relied upon in its current form.

PART – DETAILED LANDSCAPE / URBAN CANOPY OBJECTION (INCORPORATED IN FULL)

FORMAL OBJECTION – LANDSCAPE / URBAN CANOPY / AMENITY (PLAN SA / PLANNING AND DESIGN CODE)

1. PURPOSE AND SCOPE

This submission constitutes a detailed planning objection focussed specifically on the Landscape Plan and associated landscape / interface assertions relied upon in the Planning Report for the proposed residential flat building at 3 Patawalonga Frontage, Glenelg North. The submission disputes the adequacy, deliverability, and Code-alignment of the proposed landscape works, including claims that planter-based screening and balcony planting will adequately mitigate overlooking, provide meaningful urban canopy contribution, and achieve an acceptable public realm / streetscape outcome.

2. DOCUMENTS REVIEWED

- Landscape Plan – Landskap, 'Patawalonga Apartments', Ref No. 25.029, dated 09.12.2025 (including Ground Floor landscape layout, Levels 1–4 balcony details, and species schedules).
- Planning Report – Ref No. 25.029 (sections 4.13 'Landscaping' and 6.7 'Building Design').

- Architectural Plans / Ground Floor plan noting basement extent and deep planting at rear (as referenced within the landscape overlays).

3. RELEVANT CODE MATTERS (PERFORMANCE ASSESSMENT CONTEXT)

The Planning Report confirms the proposal is ‘performance assessed’ within the Urban Renewal Neighbourhood (URN) Zone. In a performance-assessed pathway, it is not sufficient to merely state that landscaping elements will be provided; the applicant must demonstrate that the landscape response achieves the intent of relevant Performance Outcomes (POs) and overlay objectives, and that any claimed mitigation measures (screening, canopy contribution, deep soil areas) are feasible and enforceable in the as-built and ongoing operational condition.

4. APPLICANT’S LANDSCAPE CLAIMS RELIED UPON IN THE PLANNING REPORT

The Planning Report asserts that the Landscape Plan: (a) provides ‘deep soil garden areas and raised planters’ with species suited to the coastal environment; and (b) provides ‘integrated planters and irrigated pots’ on all balconies (Levels 1–4).

Further, in the design assessment, the Planning Report claims that screening has been ‘thoroughly addressed’ through deep planter boxes on west-facing balconies, tall vegetation within the deep soil planting area at ground level, and perforated screens along the northern and southern elevations, said to satisfy the intent of PO 10.1 and PO 10.2 in the Design in Urban Areas section.

These assertions are disputed below on the basis that the Landscape Plan is largely reliant on raised planters and balcony pots, with limited quantification and unclear deliverability of deep soil canopy outcomes, and with no demonstrated performance evidence that the proposed planting can achieve the intended privacy / overlooking mitigation at relevant heights and timeframes.

5. ITEMISED LANDSCAPE OBJECTIONS (LANDSCAPE PLAN – LANDSKAP)

5.1 Reliance on balcony pots and integrated planters in lieu of genuine ground-level deep soil canopy

The Planning Report explicitly relies on ‘integrated planters and irrigated pots’ on all balconies (Levels 1–4) as part of the landscaping response. The Landscape Plan provides a ‘Typical 01 Balcony Details’ sheet with irrigated pots and minimum planting depth not clearly tied to mature screening performance, and a ‘Typical 02 Balcony Details’ sheet with an integrated planter with ‘min 800mm of topsoil’.

However:

- Balcony pots and planters are inherently limited in soil volume, root development, wind resilience, and irrigation reliability, particularly in a coastal, salt-laden environment.

- Balcony planting is subject to private maintenance behaviour and is not a durable substitute for at-grade canopy and deep soil zones.
- The documents do not quantify how many balconies are west-facing, which balconies carry 'integrated planters' versus only 'pots', or what mature height/density is assumed for screening.

Accordingly, the reliance on balcony planting does not demonstrate achievement of the stated screening / privacy intent, and should not be treated as satisfying PO 10.1 and PO 10.2 merely by the presence of planters.

5.2 Limited demonstrated deep soil area and constraints created by basement extent

The ground floor landscaping key denotes 'Deep soil garden bed' and also notes 'Basement extent – deep planting at rear'. This indicates that the basement footprint materially constrains true deep soil areas across the site, with most planting likely occurring in raised planters above structure.

Key concerns:

- The Landscape Plan does not provide a deep soil schedule (area in m²), soil depth profiles, or tree planting volumes demonstrating that canopy trees can reach and sustain mature canopy within structural constraints.
- Raised planters (including those described as 450H seating wall planters / steel-edged planters) are not equivalent to deep soil zones for canopy contribution.
- Where deep planting is limited to the rear, the capacity for the development to contribute meaningfully to the public realm streetscape canopy is diminished.

Absent quantified deep soil extents and structural soil volumes, the landscape response is not substantiated against relevant canopy and amenity objectives.

5.3 Unsubstantiated urban canopy outcomes (Urban Tree Canopy overlay captured)

The Planning Report identifies that the site is captured by the 'Urban Tree Canopy' overlay. In that context, a landscape response must demonstrate more than decorative planting; it must show feasible canopy establishment (species selection, soil volumes, spacing, irrigation, and maintenance).

The Landscape Plan provides imagery and a generalised 'Landscape Character' page, but does not provide the technical substantiation typically required for canopy overlays, including:

- proposed canopy cover at maturity (e.g., projected canopy area)
- deep soil volumes per tree and minimum rooting zones
- structural soil design where basement is present
- long-term maintenance/irrigation arrangements (particularly for balcony planting)

Given the acknowledged basement extent and the reliance on raised planters and balcony pots, the proposal is unlikely to achieve meaningful canopy uplift consistent with overlay intent, without major redesign to increase unencumbered deep soil zones and tree planting volumes.

5.4 Privacy and overlooking mitigation claims are not demonstrated (PO 10.1 / PO 10.2 – Design in Urban Areas)

The Planning Report claims that deep planter boxes on west-facing balconies, tall vegetation in ground-level deep soil areas, and perforated screens on side elevations 'satisfy the intent' of PO 10.1 and PO 10.2.

This is disputed because:

- No sightline analysis is provided demonstrating that the proposed planting and screens actually prevent direct overlooking into adjoining private open space and habitable room windows.
- The Landscape Plan does not specify planting heights at installation, growth rates, or time-to-effect for screening.
- Balcony planters are vulnerable to pruning/removal by occupants, and are therefore not an enforceable privacy control without binding management conditions.
- The documents are silent on whether the perforated screens are fixed, their visual permeability, and whether their locations align with key overlooking points.

Accordingly, compliance with PO 10.1 / PO 10.2 is not demonstrated; at best it is asserted. A performance-based objection is that the application does not provide sufficient evidence to conclude that overlooking impacts are appropriately mitigated.

5.5 Species selection and coastal resilience / maintenance risk

The Landscape Plan includes a 'Balcony Species' schedule (including, for example, *Banksia integrifolia* 'Sentinel' noted with H 3m / W 2m, and other species such as *Olea* 'Swan Hill' and *Myoporum* 'Fine Leaf'). While species may be generally suited to coastal conditions, the document does not provide:

- pot/planter volumes for each species
- wind loading considerations for balcony planting at height
- salt spray exposure assumptions and mitigation
- irrigation design and redundancy

The performance concern is that balcony planting is at high risk of failure (die-back, poor establishment, wind damage) which would undermine both amenity and any relied-upon privacy screening.

5.6 Streetscape interface and public realm contribution is unclear and potentially undermined by services and hardscape

The ground floor plan depicts a landscape response that includes raised planters at entry and notes the presence of a transformer and exposed fire boosters. The Planning Report also notes removal of the fire booster enclosure, leaving exposed booster pipes.

This raises streetscape and public realm concerns:

- the public realm edge can become dominated by hard infrastructure and retaining/planter walls rather than meaningful ground-level planting and canopy.
- raised planters with seating walls can be attractive, but only if they are large enough and planted with durable species that thrive long-term.
- the extent of basement under the site (and the need for services) reduces opportunities for substantial street trees.

The Landscape Plan does not include a streetscape section demonstrating

verge/footpath interface, sightlines, or how planting will soften and screen services infrastructure.

5.7 Lack of measurable landscape performance commitments and absence of an implementation / maintenance plan

The Landscape Plan is presented as 'Issue: Planning' and contains drawings and schedules, but does not include a landscape maintenance plan, establishment period commitments, replacement planting obligations, or governance mechanisms (e.g., strata management responsibilities).

Given the heavy reliance on balcony-based planting and planter screening for privacy mitigation, Council cannot reasonably rely on these elements without clear, enforceable conditions and an implementation/maintenance framework.

A performance objection is that the proposal does not demonstrate that the landscape will be delivered and maintained so as to achieve the outcomes relied upon in the Planning Report.

6. SPECIFIC REQUESTS / RELIEF SOUGHT

On landscape grounds, the relevant authority should refuse the application or, at minimum, require substantial redesign and/or further information. The following information is sought as a minimum to enable lawful and evidence-based performance assessment:

- A quantified deep soil schedule (m²) and section details confirming soil depth and unencumbered rooting volume (including where basement is present).
- A canopy projection plan demonstrating expected canopy cover at maturity and at 5- and 10-year timeframes, including tree species, spacing and crown spread assumptions.
- A privacy and overlooking sightline assessment demonstrating that proposed screening (planters/vegetation/perforated screens) prevents direct views into adjoining sensitive receivers, including at upper levels.
- A landscape establishment and maintenance plan (including irrigation design, responsibilities under strata/management, replacement obligations, and an enforceable regime for balcony planting that is relied upon for screening).
- A streetscape interface plan/section demonstrating how services infrastructure (transformer, fire boosters) is screened and how meaningful ground-level planting is achieved at the public realm edge.

7. CONCLUSION

The Landscape Plan and associated claims in the Planning Report do not demonstrate that landscaping, canopy uplift, streetscape contribution, and privacy/overlooking mitigation outcomes will be achieved in a reliable and enforceable manner. The proposal is overly reliant on raised planters and balcony pots, with limited demonstrated deep soil capacity due to basement extent, and with unsubstantiated screening claims (including those linked to PO 10.1 and PO 10.2). On these grounds, the landscape response should be rejected or substantially redesigned, with further evidence required for proper performance assessment.

PART – DETAILED ACOUSTIC IMPACT OBJECTION (INCORPORATED IN FULL)

1. Overview of Assessment Scope Deficiencies

The Acoustic Assessment S8707C2 (December 2025) prepared by Sonus Pty Ltd considers aircraft noise ingress, mechanical plant noise emissions and car parking noise emissions. However, the assessment is incomplete and does not comprehensively address all potential acoustic impacts associated with the proposed five-storey residential flat building.

The assessment relies upon provisional mechanical plant selections, assumes operational scenarios without sensitivity testing, does not evaluate tonal, impulsive or low-frequency characteristics, does not assess cumulative plant operation under peak load conditions, does not assess construction phase acoustic impacts, and does not assess balcony and communal outdoor space amenity under aircraft noise exposure.

Accordingly, the assessment fails to robustly demonstrate compliance with the Planning and Design Code and relevant statutory instruments.

2. Aircraft Noise – DTS Reliance and Overlay Compliance

The site is confirmed to be located within the ANEF 20 contour band and Sound Exposure Category 2 (SEC 2) has been applied pursuant to Ministerial Building Standard MBS 010.

While Building Rules Consent may apply DTS provisions, Planning assessment must consider the Aircraft Noise Exposure Overlay PO 1.1, which requires buildings accommodating sensitive receivers to minimise aircraft noise intrusion and provide appropriate interior acoustic amenity.

The assessment does not evaluate balcony usability under aircraft overflight events, external communal open space noise levels, frequency of aircraft noise events, sleep disturbance potential, speech interference, or maximum event characteristics.

Reliance solely upon façade insulation does not satisfy the intent of PO 1.1 in performance terms.

3. Mechanical Plant Assessment Deficiencies

Mechanical plant selections are provisional and include Daikin REYQ16BYM9, RZAV140F2V1, and VRV IV S RXYMQ9AY1 units with sound power levels of 86 dB(A), 70 dB(A), and 76 dB(A) respectively.

Final plant selection may materially alter acoustic performance. No tonal penalty assessment has been undertaken.

No low-frequency assessment has been undertaken. No vibration transmission modelling has been undertaken.

No assessment of simultaneous peak-load or emergency override scenarios has

been undertaken.

The modelling utilises ISO 9613-2 methodology but is dependent upon assumed inputs which are not finalised, and therefore compliance conclusions are conditional and uncertain.

4. Car Park Noise Assessment Issues

Car park modelling assumes 15 vehicle movements per 15-minute period and a sound power level of 82 dB(A) per vehicle.

No justification is provided for the 15-movement assumption. Peak event scenarios, weekend loading, holiday traffic, reversing alarms, door slamming, tyre squeal, ramp transition noise, and roller door impacts are not assessed.

Maximum outdoor noise at 4 Patawalonga Frontage is predicted at 69 dB(A) L_{max}, exceeding the 60 dB(A) WHO outdoor criterion.

The assessment relies upon façade insulation at the receiving property to justify compliance, which is not appropriate for planning purposes.

5. Improper Reliance on WHO Guidelines

The assessment references the Local Nuisance and Litter Control Act 2016 and WHO Guidelines for Community Noise (1999).

The Planning and Design Code DTS pathway for PO 4.1 references the Environment Protection (Commercial and Industrial Noise) Policy 2023.

The substitution of WHO 1999 criteria does not align with the Code's DTS pathway. WHO 1999 guidance has been superseded by WHO Environmental Noise Guidelines (2018), which are more stringent.

6. Failure to Assess Low-Frequency Noise and Vibration

No assessment has been undertaken of low-frequency HVAC hum, vibration transmission through slab structures, lift motor vibration, or basement exhaust fan vibration.

Under Interface Between Land Uses PO 4.1, development must not unreasonably impact the amenity of sensitive receivers, including vibration impacts. The absence of vibration modelling is a material omission.

7. Acoustic Louvre Specification Uncertainty

The report recommends full-height acoustic louvres equivalent to Fantech SBL1 units.

However, no insertion loss performance specification is provided.

No airflow trade-off assessment is provided.

No enforceable condition framework is proposed.

If louvre specification changes at detailed design stage, predicted compliance may not be achieved.

8. Internal Amenity and Ventilation Conflict

Ventilation is proposed via openable windows. If windows are opened during aircraft overflight or peak plant operation, internal noise levels will increase and may exceed SEC 2 performance expectations.

This creates a conflict between acoustic compliance, occupant comfort, and energy efficiency which has not been resolved in the assessment.

9. Cumulative Impact Not Assessed

The assessment does not evaluate cumulative mechanical plant contributions from other Urban Renewal Neighbourhood developments, nor future infill scenarios. The absence of cumulative modelling is inconsistent with strategic renewal context.

10. Planning Conclusion and Relief Sought

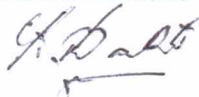
The Acoustic Assessment S8707C2 does not comprehensively demonstrate compliance with:

- Aircraft Noise Exposure Overlay PO 1.1
- Interface Between Land Uses PO 4.1
- General Development Policies DO 1
- DTS/DPF 4.1 referencing the EP Noise Policy

The application should not be approved without:

1. Final mechanical plant confirmation and revised modelling
2. Tonal and low-frequency penalty assessment
3. Vibration assessment
4. Outdoor private open space noise assessment
5. Updated WHO 2018 comparison
6. Enforceable acoustic louvre performance specifications

Steve Dantalis



Theodora Dantalis



1C Patawalonga Frontage

Glenelg North SA 5045

Representations

Representor 12 - Sara and Richard Layland

Name	Sara and Richard Layland
Address	4A Patawalonga frontage GLENELG NORTH SA, 5045 Australia
Submission Date	03/03/2026 07:41 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 It does not comply in many ways	

Attached Documents

image33-1590969.jpg
image34-1590970.jpg
image35-1590971.jpg
image36-1590972.jpg
image37-1590973.jpg

Submission to PlanSA re proposed development at 3 Patawalonga Frontage Glenelg North SA 5045 ("Proposed Development"). Application ID:25040461

I wish to raise an objection to the above development application.

The grounds for my objection are as follows:

1. The area in which the Proposed Development stands is a triangle of land bounded by King St, Patawalonga Frontage and North Esplanade and is almost fully developed with homogenous design, and the residents have in the past endorsed the retention of current zoning and development parameters.
2. The Proposed Development appears to contravene the assessment provisions provided per the Urban Renewal Neighbourhood Zone in a number of areas including the following:
 - 2.1 **Building Height** – the Proposed Development significantly exceeds the allowed maximum building height of 3 levels thereby intruding on neighbouring properties and in total disregard of the homogenous design of existing neighbouring buildings.
 - 2.2 **Primary Street Setback** – the frontage of the Proposed Development is not sufficiently set back from primary street boundary that stipulates a minimum 3 metre setback.
 - 2.3 **Boundary Walls and Setbacks** – the Boundary walls and setbacks of the Proposed Development do not adhere to zoning regulations thereby intruding on neighbouring properties.
3. The application has been made to the State Planning Commission, but there is no impediment to a complying development under the existing Council zoning.
4. The application describes the Proposed Development as comprising five floors, but this is a misconception as it comprises six floors when the basement is taken into account.
5. The 'photographic' representations at page 5 "Precinct Context Existing Overheight" and page 29 "Precedents and Materiality" appear misleading with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. The balance of samples are not appropriate comparisons as they are not in the same precinct or were developed before existing zoning regulations.
6. There is a lack of adequate landscaping. The garage 'bunker' extends from boundary to boundary a metre above ground level. This along with vehicle driveway, paths, and power transformer appear to cover 95% of the site in concrete, precluding the illustrated "11-and-12-metre trees". Reference is also made to planter boxes for individual apartments shown containing overhanging plants and foliage, but in reality such gardens are virtually impossible to maintain in coastal environments.
7. The Proposed Development includes 14 car parks in addition to 3 double car parks. There is no indication of which car parks are designated as visitor car parks. The double car parks cannot be utilised as visitor car parks or shared amongst different apartment owners as they require end to end parking. The extent of parking provided appears inadequate particularly given that most apartment owners will likely require parking for more than one vehicle. This will force occupants and visitors to park their vehicles on the street, primarily Patawalonga Frontage, thereby adding significantly to street congestion and traffic management issues. This issue is not adequately addressed in the submission.



SIDE VIEW
OVERLOOKING
OUR POOL

14.378m

5.902m

FLOOR 5

FLOOR 4

FLOOR 3

9,790
ABOVE

5 LEVEL

4 LEVEL

3 LEVEL

2 LEVEL

RL 10,490 m
NOT RL 13,59 m
AS SHOWN ON
PLANS



REF LEVEL

LEVEL 5

LEVEL 4

LEVEL 3

LEVEL 2

9,790 M
ABOVE

14,378 M
ABOVE

THE 2 REAR
TOP FLOORS
WILL OVER LOOK
POOL



Representations

Representor 13 - John Smedley

Name	John Smedley
Address	16/7 Patawalonga Frontage GLENELG NORTH SA, 5045 Australia
Submission Date	04/03/2026 11:40 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 Please refer to the accompanying letter	

Attached Documents

State-Planning-Commission-The-Moorings-Response-3-Patawalonga-Ftg-1591138.pdf

Community Corporation 22480 Inc.
C/- 16/7 Patawalonga Frontage,
Glenelg North SA 5045

State Planning Commission
The Moorings
GPO Box 1815
Adelaide SA 5000

2nd March 2026.

Dear Sir/Madam,

Re: 3 PATAWALONGA FTG GLENELG NORTH SA 5045
Application ID: 25040461
Residential Flat Building

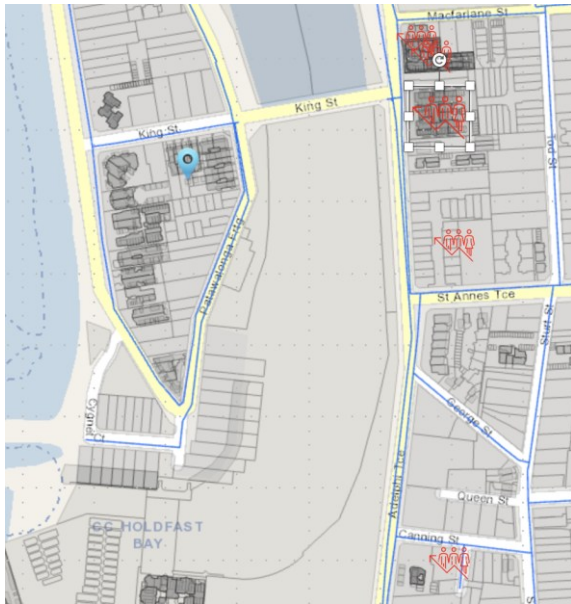
As a neighbour to the above site and representing the 33 apartments within the Moorings building, we provide comment on the proposed development at 3 Patawalonga Frontage, Glenelg North.

In general, we support the development as submitted although have concerns to some detail provided and ask the Assessment Panel to consider these in their deliberation.

Item 1:

The Moorings building has been in place for some 20 years. At the time of building, the fire system was based on the water pressure available from the water main in King Street and Patawalonga Frontage. Over the intervening period the water pressure has significantly declined to point where the pressure is below that required by the MFS to fight a fire within the building. The matter was recently raised with our corporation by the Building Fire Safety Committee of Council, and a recent on-site inspection by the committee was undertaken.

There have recently been two significant apartment towers brought on line in Adelphi Terrace and a third is well advanced in construction. These are all part of the water system that serves the buildings in Patawalonga Frontage. This is on top of the general increase in housing density within Glenelg North.



Water mains and the increased housing density nearby

SA Water have not been able to keep pace with infrastructure upgrades to support the additional draw on the system. Another 14 dwellings in Patawalonga Frgt cannot be supported without this being addressed. The existing dwellings will be further impacted which affects the use of water at a personal level and more importantly from a fire safety perspective.

Item 2:

The roof plan shows no plant on the roof other than solar panels. Given the building already exceeds the building height limits, any plans for roof plant needs to be sited so that it is not visible from the frontage and must be fully screened.

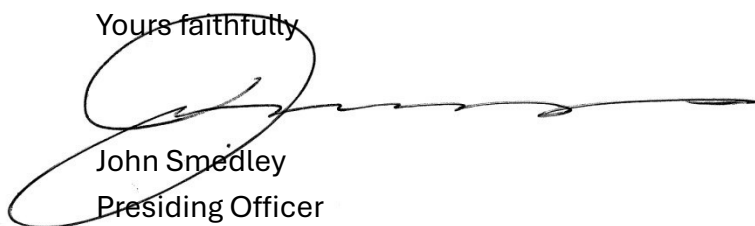
Item 3:

Car parking is already an issue in Patawalonga Frgt exacerbated by the daily activities of those accessing the adjacent marina. One on street carpark will be lost through the widening of the cross-over. The development shows a total of 20 carparks for the 14 apartments. 4 will be allocated to the top-level apartments, 12 to the remaining apartments, leaving 4 visitor parks (which should have 5). Two of these will be double depth which is not workable for a visitor park. This will be a luxury development where most of the new apartments will be two car residents. This will place significant strain on the already well utilised on street parking.

With the car park having a one-way access/egress there will likely at times be queuing of traffic in the street adding to the congestion within Patawalonga Frontage.

We respectfully ask that these matters be fully addressed in the assessment of this development. We do not wish to make a personal representation.

Yours faithfully

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a series of horizontal strokes that taper off to the right.

John Smedley

Presiding Officer

The Moorings Corporation Committee

Representations

Representor 14 - Robert Cleary

Name	Robert Cleary
Address	1/10 north esplanade GLENELG NORTH SA, 5045 Australia
Submission Date	04/03/2026 11:49 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 support the development with some concerns
Reasons In line with other residences I believe height should be no higher than the existing residences along the street.	

Attached Documents

Representations

Representor 15 - Greg Molfetas

Name	Greg Molfetas
Address	179 Greenhill Road PARKSIDE SA, 5061 Australia
Submission Date	04/03/2026 03:40 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 Refer to attached	

Attached Documents

iBS_LETTER_SCAP-ID25040461-OBJECTION-SUBMISSION-4.3.26-1591401.pdf
Representation-on-Application-1591402.pdf



4 March 2026

State Commission Assessment Panel
State Planning Commission
GPO Box: 1815
ADELAIDE SA 5001

Dear Presiding Member

APPLICATION ID: 25040461 – REPRESENTATION AGAINST APPLICATION FOR PROPOSAL AT 3 PATAWALONGA FRONTAGE, GLENELG NORTH

We act for the property owner, GSM Glenelg Pty Ltd (ACN 669 761 326) of Unit 43, 8-9 North Esplanade, Glenelg North. We have been instructed to review and assess the proposed development comprising a five-level residential flat building containing 14 dwellings, basement car parking and landscaping at 3 Patawalonga Frontage, Glenelg North.

Following our review of the development application, including the planning report, architecture drawings and supporting documentation, we provide this written representation objecting to the proposal.

1. Introduction

This submission objects to the proposed five level residential flat building with a maximum height of 17.75 metres on a site of 854 square metres within the Urban Renewal Neighbourhood Zone.

The proposed development involves multiple and significant departures from the Planning and Design Code, including exceedances in building height, density, setbacks and built form scale relative to the capacity of the site.

For the reasons outlined in this submission, the proposal fails to demonstrate compliance with a number of relevant Performance Outcomes and Deemed-to-Satisfy / Designated Performance Feature provisions of the Planning and Design Code.

When assessed against the applicable provisions, and having regard to the scale of the departures proposed, the development represents a level of intensity and built form mass that is inconsistent with the intended character of the immediate locality and the development framework established under the Code.

Accordingly, it is submitted that the proposal does not achieve the outcomes sought by the Planning and Design Code and should not be supported in its current form..

2. Relevant Provisions under the Planning & Design Code

The following provisions of the Planning and Design Code are relevant to the assessment of the proposal.

- (a) Urban Renewal Neighbourhood Zone
 - PO 2.1, DTS/DPF 2.1 – Building Height
 - PO 6.1, DTS/DPF 6.1 – Side Boundary Setback

- PO 7.1, DTS/DPF 7.1 – Rear Boundary Setback
- PO 8.1, DTS/DPF 8.1 – Net Density
- PO 8.2, DTS/DPF 8.2 – Higher Density Thresholds

(b) Design in Urban Areas

- PO 1.1
- PO 1.3
- PO 12.1
- PO 12.3
- PO 16.1
- PO 18.1
- PO 27.1, DTS/DPF 27.1
- PO 28.3, DTS/DPF 28.3
- Table 1 – Open Space

3. Height Non Compliance

Under PO 2.1, DTS/DPF 2.1, the Code prescribes:

- Maximum 11.5 metres
- Maximum 3 levels

The proposal is:

- 17.75 metres
- 5 levels

This constitutes a 7.25 metre exceedance and two additional storeys.

PO 2.1, together with Design in Urban Areas PO 1.1, PO 1.3 and PO 12.1, requires building height and scale to be consistent with the desired character of the zone and streetscape.

Irrespective of taller buildings elsewhere in the **broader** locality, assessment must be undertaken against the Code and the immediate streetscape context.

The Planning Report does not demonstrate why a compliant three level building could not achieve the policy intent, nor how five levels is justified where the prevailing character along Patawalonga Frontage facing the Glenelg Yacht Club between King Street and North Esplanade is predominantly two to three levels.

4. Density Non Compliance

PO 8.1 and DTS/DPF 8.1 provides that allotments achieve a net density of up to 70 dwellings per hectare.

The subject site is 854 square metres, which equates to 0.0854 hectares.

Applying the DTS rate:

- $0.0854 \text{ ha} \times 70 \text{ dwellings per hectare} = \text{approximately } 6 \text{ dwellings}.$

Accordingly, the site supports approximately 5 to 6 dwellings under DTS 8.1.

The proposal delivers 14 dwellings, equating to approximately 164 dwellings per hectare. This is **more than double** the DTS benchmark density.

PO 8.2 and DTS/DPF 8.2 anticipate higher density development primarily on sites:

- Exceeding 1,200 square metres
- With frontages greater than 35 metres

The subject site is:

- 854 square metres
- 21.27 metre frontage

It does not meet either threshold.

The Planning Report does not reconcile how a five level, 14 dwelling outcome on a sub threshold site satisfies PO 8.1 or PO 8.2. The density proposed is fundamentally inconsistent with the scale anticipated for this allotment under the Code.

5. Streetscape Character between King Street and North Esplanade

PO 1.1, PO 1.3, PO 12.1

The defined streetscape between King Street and North Esplanade exhibits a clear and consistent built form pattern. Development within this segment is overwhelmingly characterised by two to three storey new dwellings and residential flat buildings across almost all allotments.

The subject land and 2 Patawalonga Frontage to the south comprise single storey detached dwellings, reinforcing the lower scale character at this particular point within the streetscape.

The prevailing and emerging character of this specific streetscape segment is therefore unequivocally two to three levels. This reflects and reinforces the anticipated character under PO 1.1, which seeks development consistent with the zone's intended scale. It also aligns directly with PO 1.3 and PO 12.1, which require new development to complement the streetscape and respond appropriately to local context.

A five level building cannot be characterised as a compatible transition in height. It represents a substantial and abrupt escalation in scale that materially departs from the established two to three storey streetscape pattern and introduces a visually dominant built form that overwhelms the immediate locality.

The proposal would disrupt the coherent height rhythm, create a pronounced vertical discontinuity and undermine the consistent scale that defines this portion of Patawalonga Frontage. It does not complement the streetscape. It materially conflicts with it.

In planning terms, the proposal fails to properly respond to the immediate streetscape context and is therefore inconsistent with PO 1.1, PO 1.3 and PO 12.1 of the Design in Urban Areas provisions.

6. Rear Boundary Setback Non Compliance

PO 7.1 and DTS/DPF 7.1

DTS/DPF 7.1 requires rear setbacks of:

- 3m for first level
- 5m for second level
- 5m plus any increase in wall height above 7m for buildings of three levels and above

For a building of 17.75m height, the formula requires, the upper levels do not achieve proportional separation consistent with this requirement.

PO 7.1 requires rear setbacks to provide:

- Separation to minimise visual impact
- Access to light and ventilation
- Open space opportunity
- Landscaping space

Even if the structural wall were argued to comply numerically, projecting balconies form part of the building and materially reduce effective separation. In the context of five levels, this intensifies visual dominance and undermines the functional purpose of rear boundary setbacks.

7. Side Setbacks and Visual Mass

PO 6.1 and DTS/DPF 6.1

Under DTS/DPF 6.1, side boundary setbacks are intended to increase proportionally with building height to ensure adequate spatial separation, manage interface impacts and maintain amenity for adjoining properties.

The proposal provides side setbacks as low as approximately 1.25 metres for a five level building with a height of 17.75 metres.

For a development of this scale, such minimal lateral separation is manifestly inadequate. PO 6.1 requires development to be sited to provide appropriate separation from side boundaries having regard to building height, scale and potential impacts on adjoining land.

The clear intent of the provision is that increased building height must be accompanied by increased spatial separation to mitigate visual bulk, overshadowing, overlooking and sense of enclosure. Articulation, facade treatment and landscaping do not compensate for insufficient spatial separation. The physical proximity of a 17.75 metre building to the side boundary materially increases visual mass and enclosure effects.

In planning terms, the proposed side setbacks are inconsistent with the proportional separation principle embedded in DTS/DPF 6.1 and fail to achieve the interface management outcomes required under PO 6.1.

8. Private Open Space Non Compliance

PO 27.1, PO 28.3 and Table 1

Table 1 – Private Open Space requires:

- Two bedroom dwellings – minimum 11sqm with minimum dimension of 2.4m
- Three bedroom dwellings – minimum 15sqm with minimum dimension of 2.6m

Apartments 2A, 2B, 2C and 2D provide significantly less than 11sqm and fail to achieve the required minimum dimension. The incorporation of planter boxes further reduces usable width by nearly 500mm.

PO 27.1 and PO 28.3 require private open space to be functional and usable. The proposed balconies do not satisfy these requirements.

9. Contextual Argument Misapplied

The Planning Report relies heavily on the existence of taller buildings elsewhere in the locality as justification for the proposed five level form. That approach is fundamentally flawed.

Under a Code based assessment, pointing to surrounding development as justification does not replace statutory compliance. The Planning and Design Code is the governing instrument. The existence of taller buildings in the broader locality does not amend or override the prescribed height, density and setback controls applicable to this site.

Where a proposal involves substantial departures from the numeric controls, including a 7.25 metre height exceedance and more than double the anticipated DTS density, the proponent must provide objective, quantified and comparative analysis demonstrating that the development satisfies the relevant provisions of the Code.

The Planning Report fails to provide that level of structured and evidence based justification.

It does not provide a comparative envelope analysis between a compliant three level building and the proposed five level form. It does not demonstrate how 14 dwellings on an 854m² site complies with PO 8.1 or satisfies the higher density criteria under PO 8.2. It does not establish how the increased height and reduced separation achieve the functional purposes of rear setbacks under PO 7.1 or the height expectations under PO 2.1.

Instead, the report assumes that because taller buildings exist in the broader locality, a five-level building on this site is acceptable.

In simple terms, saying the proposal fits the area is not enough. That argument has little weight unless it is supported by clear evidence showing the development complies with the Planning and Design Code, including both the Performance Outcomes and the relevant DTS/DPF provisions.

10. Cumulative Impact

The report assesses each non compliance separately.

The Planning Report isolates each area of non compliance and attempts to address them individually. That approach fails to properly deal with the central planning issue, which is the combined built form outcome.

The proposal must be assessed as a whole, not as a series of discrete departures.

In combination, the development comprises:

- Two additional storeys beyond the prescribed limit
- More than double the DTS density benchmark
- Side setbacks as low as approximately 1.2 metres
- Reduced rear boundary separation relative to building height
- Five storeys of continuous vertical mass on a constrained 854sqm site

These elements do not operate independently. Together, they significantly amplify visual bulk, dominance, intensity and interface impacts on the immediate locality.

When assessed holistically, the cumulative effect is a building of excessive scale and intensity that is incompatible with the established two to three storey streetscape pattern and inconsistent with the intended streetscape character of the immediate locality.

The Planning Report does not properly assess the combined effect of these non-compliances. Instead, it considers each issue separately and does not address the cumulative impact of increased height, excessive density and reduced setbacks occurring together.

When considered as a whole, the resulting built form is excessive for the size of the site and inconsistent with the scale of development anticipated under the Planning and Design Code for this section of the Patawalonga Frontage.

Conclusion

Irrespective of existing height and density within the broader locality, the proposal must be assessed against the Planning and Design Code.

The proposal:

- Exceeds maximum height by 7.25 metres
- Exceeds maximum levels by two storeys
- Delivers 14 dwellings where DTS 8.1 supports approximately 6
- Imposes high density on a sub threshold site contrary to PO 8.2
- Disrupts the prevailing two to three level streetscape character of the immediate locality
- Fails to achieve rear boundary separation consistent with DTS/DPF 7.1 and PO 7.1
- Fails to demonstrate compliance with PO 15.1 in relation to visual mass
- Provides inadequate private open space contrary to PO 27.1 and PO 28.3

The Planning Report relies on contextual assertions rather than objective demonstration of compliance with the relevant Performance Outcomes.

For these reasons, the proposal is inconsistent with the Planning and Design Code and should not be approved.

Yours sincerely,



Dennis Chung

Director / Principal

BA Planning / Grad. Dip. Urban & Regional Planning / Grad. Dip. Business Management

REPRESENTATION ON APPLICATION

Planning, Development and Infrastructure Act 2016

Applicant: GSM Glenelg Pty Ltd ACN 669 761 326 *[applicant name]*

Development Number: 25040461 *[development application number]*

Nature of Development: Five Level Residential Flat Building *[development description of performance assessed elements or aspects of outline consent application]*

Zone/Sub-zone/Overlay:

Subject Land: 3 Patawalonga Frontage Glenelg North SA 5045 *[street number, street name, suburb, postcode]*
[lot number, plan number, certificate of title number, volume & folio]

Contact Officer: Gregory Molfetas *[relevant authority name]*

Phone Number: 0418 806 948 *[authority phone]*

Close Date: 05/03/2026 *[closing date for submissions]*

My name*: Gregory Molfetas

My phone number: 0418 806 948

My postal address*: 179 Greenhill Road, Parkside SA 5063

My email: greg.molfetas@tritan.com.au

** Indicates mandatory information*

My position is:

- ☐ I support the development
- ☐ I support the development with some concerns
- ☒ I oppose the development



Government of South Australia

Department for Housing
and Urban Development

The specific reasons I believe that consent should be granted/refused are:

Refer to attachment

[attach additional pages as needed]

Note: In order for this submission to be valid, it must:

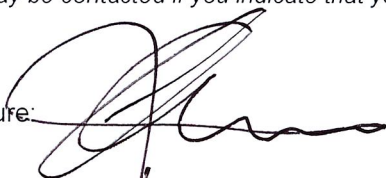
- be in writing; and
- include the name and address of the person (or persons) who are making the representation; and
- set out the particular reasons why consent should be granted or refused; and
- comment only on the performance-based elements (or aspects) of the proposal, which does not include the:
 - Click here to enter text. *[list any accepted or deemed-to-satisfy elements of the development]*.

I: ☐ wish to be heard in support of my submission*
☒ do not wish to be heard in support of my submission

By: ☐ appearing personally
☐ being represented by the following person: Click here to enter text.

**You may be contacted if you indicate that you wish to be heard by the relevant authority in support of your submission*

Signature:



Date: 04/03/2026

Return Address: 179 Greenhill Road, Parkside SA 5063 *[relevant authority postal address]* or

Email: greg.molfetas@tritan.com.au *[relevant authority email address]* or

Complete online submission: plan.sa.gov.au/have_your_say/notified_developments

Representations

Representor 16 - Dawn Eastwood

Name	Dawn Eastwood
Address	UNIT 5 6 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	16/03/2026 03:40 PM
Submission Source	Post
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 See attached document	

Attached Documents

RepresentationByDawnEastwood-13758985.pdf
RepresentationByDawnEastwood-13758999.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

The Holdfast Bay Planning and Design Code 2016 was adopted by the correct procedure of exhibition, comment, and approval by the State Planning Authority in 2016.

The King St./Patawalonga Frontage/North Esplanade 'triangle' is almost fully developed with homogenous design, and the residents overwhelmingly endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

Summary of the Objections:

- 1 The proposal does not satisfy the terms of Permissible Development under the zoning.
- 2 There is no impediment to a complying development under the existing Council zoning.
- 2 The proposal is a GROSS OVERDEVELOPMENT by a factor of 250% to 280%.
- 3 The proposal describes existing -2floors with garage under as '3 floors', 3 floors with garage under, as '4 floors', but fails to describe the 5-story proposal with parking as SIX FLOORS
- 4 The 'photographic' representations p5, Precinct Context and p29 Precedents and Materiality are designed to **Mislead the Planning Commission** with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. the balance of samples are irrelevant as they are NOT in this precinct, 40yo pre zoning, on opposite side of the river, different Zoning and one is 400m away!

- 5 NO LANDSCAPING - the garage 'bunker' extends from boundary to boundary a meter above ground level plus vehicle driveway, paths, and power transformer **covering 95% of the site in concrete!** --- **precluding** the illustrated "11-and-12-meter trees" ????

- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s Dawn Eastwood

Address 5/6 North Esplanade, Glenelg 5045

Signed Dawn Eastwood

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

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- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s Dawn Eastwood

Address 5/6 North Esplanade, Glenelg 5045

Signed Dawn Eastwood

Representations

Representor 17 - Carlene Vine

Name	Carlene Vine
Address	UNIT 1 6 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	16/03/2026 03:44 PM
Submission Source	Post
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 See attached document	

Attached Documents

RepresentationFromCarleneVine-13759105.pdf
--

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

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The King St./Patawalonga Frontage/North Esplanade 'triangle' is almost fully developed with homogenous design, and the residents **overwhelmingly** endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

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- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s

Carlene Vine

*Contracted
over 15/26/16*

North Esplanade, Glenelg North 5045

Signed

Carlene

Representations

Representor 18 - Margaret Hokin

Name	Margaret Hokin
Address	UNIT 9 1 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	16/03/2026 03:46 PM
Submission Source	Post
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons	

Attached Documents

RepresentationFromMargaretHokin-13759137.pdf
--

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

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- 2 The proposal is a GROSS OVERDEVELOPMENT by a factor of 250% to 280%.
- 3 The proposal describes existing -2floors with garage under as '3 floors', 3 floors with garage under, as '4 floors', but fails to describe the 5-story proposal with parking as SIX FLOORS
- 4 The 'photographic' representations p5' Precinct Context and p29 Precedents and Materiality are designed to **Mislead the Planning Commission** with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. the balance of samples are irrelevant as they are NOT in this precinct, 40yo pre zoning, on opposite side of the river, different Zoning and one is 400m away!
- 5 NO LANDSCAPING - the garage 'bunker' extends from boundary to boundary a meter above ground level plus vehicle driveway, paths, and power transformer **covering 95% of the site in concrete!** --- **precluding** the illustrated "11-and-12-meter trees" ????
- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s MARGARET HOKIN

Address 911 NORTH ESPLANADE GLENELG NORTH

Signed A. Hokin

Representations

Representor 19 - Mjaem Drew

Name	Mjaem Drew
Address	UNIT 26 4 KING STREET GLENELG NORTH SA, 5045 Australia
Submission Date	16/03/2026 03:47 PM
Submission Source	Post
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 See attached	

Attached Documents

RepFromMjaemDrew-13759167.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

The Holdfast Bay Planning and Design Code 2016 was adopted by the correct procedure of exhibition, comment, and approval by the State Planning Authority in 2016.

The King St./Patawalonga Frontage/North Esplanade 'triangle' is almost fully developed with homogenous design, and the residents **overwhelmingly** endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

Summary of the Objections:

- 1 The proposal does not satisfy the terms of Permissible Development under the zoning.
- 2 There is no impediment to a complying development under the existing Council zoning.
- 2 The proposal is a GROSS OVERDEVELOPMENT by a factor of 250% to 280%.
- 3 The proposal describes existing -2floors with garage under as '3 floors', 3 floors with garage under, as '4 floors', **but fails to describe the 5-story proposal with parking as SIX FLOORS**
- 4 The 'photographic' representations p5' Precinct Context and p29 Precedents and Materiality are designed to **Mislead the Planning Commission** with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. the balance of samples are irrelevant as they are NOT in this precinct, 40yo pre zoning, on opposite side of the river, different Zoning and one is 400m away!
- 5 NO LANDSCAPING - the garage 'bunker' extends from boundary to boundary a meter above ground level plus vehicle driveway, paths, and power transformer **covering 95% of the site in concrete!** ---- **precluding** the illustrated "1-and-12-meter trees" ????
- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s M. J + C M. D. V. E. N

Address 26/4 King St, Glenelg North SA

Signed E. V. O. D. V. E. N

Representations

Representor 20 - Kerry Zervas

Name	Kerry Zervas
Address	UNIT 2 4 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	16/03/2026 03:49 PM
Submission Source	Post
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 See attachment	

Attached Documents

RepFromKerryZervas-13759237.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461
5 Patawalonga Frontage Glenelg Nth 5045

I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

The Holdfast Bay Planning and Design Code 2016 was adopted by the correct procedure of exhibition, comment, and approval by the State Planning Authority in 2016.

The King St./Patawalonga Frontage/North Esplanade 'triangle' is almost fully developed with homogenous design, and the residents overwhelmingly endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

Summary of the Objections:

- 1 The proposal does not satisfy the terms of Permissible Development under the zoning.
- 2 There is no impediment to a complying development under the existing Council zoning.
- 2 The proposal is a GROSS OVERDEVELOPMENT by a factor of 250% to 280%.

- 3 The proposal describes existing -2floors with garage under as '3 floors', 3 floors with garage under, as '4 floors', **but fails to describe the 5-story proposal with parking as SIX FLOORS**
- 4 The 'photographic' representations p5' Precinct Context and p29 Precedents and Materiality are designed to **Mislead the Planning Commission** with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. the balance of samples are irrelevant as they are NOT in this precinct, 40yo pre zoning, on opposite side of the river, different Zoning and one is 400m away!

- 5 NO LANDSCAPING - the garage 'bunker' extends from boundary to boundary a meter above ground level plus vehicle driveway, paths, and power transformer **covering 95% of the site in concrete!** --- **precluding** the illustrated "11-and-12-meter trees" ????

- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds! - **Definitely won't!!**

Name/s----- Kerry Zervas

Address----- 2/4 North Esplanade Glenelg North

Signed----- 

* Traffic across King Bridge is already banked up daily without additional daily users.

Representations

Representor 21 - Garrin Ross and Mandy Jarrett

Name	Garrin Ross and Mandy Jarrett
Address	1B PATAWALONGA FRONTAGE GLENELG NORTH SA, 5045 Australia
Submission Date	16/03/2026 05:43 PM
Submission Source	Email
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	Yes
My position is	I oppose the development

Reasons

Attached is our completed Public Notification Representation on Application document. We very strongly object to this proposed 5-storey residential flat building and trust that it will be refused after considered review of our legitimate objections, the multiple incorrect and misleading statements in the application, and its many gross violations of the Urban Renewal Neighbourhood (URN) Zone for this section of Patawalonga Frontage. It does not comply with or satisfy the Urban Renewal Neighbourhood Zone regulations in any way whatsoever, will be a massive and dominant eyesore to the streetscape of Patawalonga Frontage, and will significantly affect the neighbouring properties in quality of living, value of their properties, and financial benefits they receive from current/future solar electricity generation due to overshadowing. Compliance to current building regulations is a critical requirement to prevent the future duplication of poor decisions in the past. Trying to bypass the current URN Zoning regulations by comparing this development application to buildings erected under previous regulations is simply an effort to run roughshod over the current regulations and neighbouring property owners/residents for the financial benefit of the developer. We request the following: • State Planning Commission carefully consider all the objections we've explained in the following pages and uphold the URN Zoning regulations so the streetscape of Patawalonga Frontage is maintained for the enjoyment and financial benefit of all current owners in the street who have invested and are living there with the understanding that the current URN Zoning regulations would be fully complied with in the future. • A representative from the State Planning Commission visit, walk and assess the streetscape along both Patawalonga Frontage and North Esplanade (from King Street to Cygnet Court) to gain a firsthand understanding of the many valid objections explained in this letter. • Refuse this Proposed Development Application and only allow a development that fully complies with the current Urban Renewal Neighbourhood Zone regulations.

Attached Documents

Representation-on-application-id-25040461-garrinross-mandyjarrett-13761441.pdf

REPRESENTATION ON APPLICATION

Planning, Development and Infrastructure Act 2016

Applicant:	Garrin Ross & Mandy Jarrett <i>[applicant name]</i>
Development Number:	25040461 <i>[development application number]</i>
Nature of Development:	5-Level Residential Flat Building <i>[development description of performance assessed elements or aspects of outline consent application]</i>
Zone/Sub-zone/Overlay:	Urban Renewal Neighbourhood Zone <i>[zone/sub-zone/overlay of subject land]</i>
Subject Land:	3 Patawalonga Frontage, Glenelg North, 5045 <i>[street number, street name, suburb, postcode]</i> <i>[lot number, plan number, certificate of title number, volume & folio]</i>
Contact Officer:	State Planning Commission <i>[relevant authority name]</i>
Phone Number:	+61 1800 752 664 <i>[authority phone]</i>
Close Date:	Thursday 5 March 2026 at 11:59 pm <i>[closing date for submissions]</i>

My name*: Garrin Ross	My phone number: 0438 944 204
My postal address*: 1b Patawalonga Frontage, Glenelg North SA 5045	My email: garrin.ross@bigpond.com

* Indicates mandatory information

My position is:	☐ I support the development
	☐ I support the development with some concerns
	☒ I oppose the development



Government of South Australia

Department for Housing
and Urban Development

To: **State Planning Commission**
GPO Box 1815, Adelaide SA 5001

Monday 2nd March 2026

Re: **Proposed Development Application ID 25040461**
3 Patawalonga Frontage, Glenelg North S.A. 5045



From: **Garrin Ross & Mandy Jarrett**, owners and residents of
1b Patawalonga Frontage, Glenelg North S.A. 5045

We **very strongly object** to this proposed 5-storey residential flat building and trust that it will be refused after considered review of our legitimate objections, the multiple incorrect and misleading statements in the application, and its many gross violations of the Urban Renewal Neighbourhood (URN) Zone for this section of Patawalonga Frontage.

It does not comply with or satisfy the Urban Renewal Neighbourhood Zone regulations in any way whatsoever, will be a massive and dominant eyesore to the streetscape of Patawalonga Frontage, and will significantly affect the neighbouring properties in quality of living, value of their properties, and financial benefits they receive from current/future solar electricity generation due to overshadowing.

Compliance to current building regulations is a critical requirement to prevent the future duplication of poor decisions in the past. Trying to bypass the current URN Zoning regulations by comparing this development application to buildings erected under previous regulations is simply an effort to run roughshod over the current regulations and neighbouring property owners/residents for the financial benefit of the developer.

We request the following:

- State Planning Commission carefully consider all the objections we've explained in the following pages and uphold the URN Zoning regulations so the streetscape of Patawalonga Frontage is maintained for the enjoyment and financial benefit of all current owners in the street who have invested and are living there with the understanding that the current URN Zoning regulations would be fully complied with in the future.
- A representative from the State Planning Commission visit, walk and assess the streetscape along both Patawalonga Frontage and North Esplanade (from King Street to Cygnet Court) to gain a firsthand understanding of the many valid objections explained in this letter.
- Refuse this Proposed Development Application and only allow a development that fully complies with the current Urban Renewal Neighbourhood Zone regulations.

Yours sincerely,

Garrin Ross
1b Patawalonga Frontage, Glenelg North S.A. 5045
M: 0438 944 204
E: garrin.ross@bigpond.com

Part 2 – Zones and Sub Zones

Urban Renewal Neighbourhood Zone

Assessment Provisions (AP)

Desired Outcome (DO)

- DO 1 Housing and other land uses which no longer meet community preferences are replaced with new diverse housing options. Housing density increases, taking advantage of well-located urban land. Employment and community services will improve access to jobs, goods and services without compromising residential amenity.

Performance Outcomes (PO) and Deemed to Satisfy (DTS) / Designated Performance Feature (DPF) Criteria:

PO 1 Land Use and Intensity

- PO 1.1 Predominantly residential development with complementary non- residential uses that support an active, convenient, and walkable urban neighbourhood.

DTS/DPF 1.1 (k) Residential flat building

PO 2 Building Height:

- PO 2.1 Buildings generally 2-3 levels with taller buildings located on sites that are a suitable size and dimension to manage massing and impacts on adjoining residential development.

DTS/DPF 2.1 Building height (excluding garages, carports and outbuildings) is no greater than:

- (a) the following:
 - Maximum Building Height (Metres): Maximum building height is 11.5 m
 - Maximum Building Height (Levels): Maximum building height is 3 levels
- (b) in all other cases (i.e. there are blank fields for both maximum building height (metres) and maximum building height (levels)):
 - i. 4 building levels and 15 m where the site:
 - A. is at least 1200 m² in area and
 - B. has a frontage of 35 metres
 - or
 - ii. 3 building levels and 12 m in all other circumstances

In relation to DTS/DPF 2.1, in instances where:

- (c) more than one value is returned in the same field, refer to the *Maximum Building Height (Levels) Technical and Numeric Variation layer* and *Maximum Building Height (Metres) Technical and Numeric Variation layer* in the SA planning database to determine the applicable value relevant to the site of the proposed.
- (d) only one value is returned for DTS/DPF 2.1(a) (i.e. there is one blank field), then the relevant height in metres or building levels applies with no criteria for the other.

The specific reasons I believe that consent should be refused are:

1. Gross violation of the Maximum Building Height.

- a) The proposed building height is 17.75 metres in height. This is 6.25 metres (54%) higher than the TNV maximum building height!
- b) The proposed building height is 5 levels (not including basement car parking). This is 2 levels (67%) more than the TNV maximum number of building levels!

2. Gross violation of exceptions for 4 building levels and 15 m maximum building height.

- a) The site area is 854 m². This is well short (71%) of the minimum 1,200 m² site area for a 4-level building exception to the maximum building height levels.
- b) The site frontage is 21.27 metres. This is well short (61%) of the minimum 35 metre frontage for a 4-level building exception to the maximum building height levels.

3. Misleading references to 'Beyond' buildings behind the proposed development.

- a) 5 North Esplanade is referenced as a 3-storey building. However, it's a 2-storey frontage building with a roofed living area.
- b) 6 North Esplanade is referenced as a 5-storey building. However, it's a 3-storey frontage building with a roofed living area and semi-underground car park.
- c) 7 North Esplanade is referenced as a 5-storey building. However, it's a 3-storey frontage building with a setback 4th level (that cannot be seen from street level) and semi-underground car park.

If this proposed development was for a 3-story frontage building with a single setback penthouse on the 4th level, then and only then could it be considered comparable to 6 and 7 North Esplanade, and even then, it would be violating the current URN Zoning requirements.

4. Irrelevant comparison to the proximity to seven buildings along Patawalonga Frontage, North Esplanade and King Street.

- a) All Patawalonga Frontage buildings comply with the maximum building height for the street of 11.5 meters and 3 levels. The only exception is 7 Patawalonga Frontage with a single penthouse set back on level 4 that complies with zoning exceptions (for site area at least 1200 m² and frontage of 35 metres).
- b) Current zoning regulations for North Esplanade are the same as for Patawalonga Frontage, and buildings that exceed the current zoning heights were build prior to the current regulations. As such they have no relevance to the proposed excessive height of the proposed development application at 3 Patawalonga Frontage.
- c) The 12-storey flat building on the corner of northern corner of King Street and North Esplanade is not in the near proximity and is not even visible from 3 Patawalonga Frontage, so any reference to this building is simply misleading.

5. Planning Report clause 6.4 Building Height

Report statement *"existing developments in the locality do not reflect the height prescribed by the URN Zone and that the horse had effectively bolted from a contextual perspective. As illustrated on Page 5 of ECA's compendium of drawings, there are 10 buildings in close proximity to the site that already exceed the maximum building height, thereby rendering this planning policy somewhat*

redundant.”

This statement is simply ridiculous – any buildings built prior to and exceeding the maximum height of the current URN Zone requirements cannot be used as a precedent for new building developments. If this were the case, there would be no point in having the current URN Zone requirements. If current URN Zone requirements were ignored, then any development application up to 12-storeys in height would likely get approval simply to match the 12-storey height of the residential flat building corner of King Street and North Esplanade.

6. Setback of South-East corner balconies over Levels 2 to 5 is not in keeping with the street.

The SE dwelling corner balconies on levels 2, 3, 4, and 5 have a setback of around 1.0 metre. While this may be technically compliant, a 1.0 metre setback over 3.7 to 17.0 metres height it is certainly out of character with properties on the Patawalonga Frontage (especially over this height) and will be an eyesore in the street. This sort of setback creepage in building approval leads to dilution of street character and should be avoided at all costs. Once a development like this goes ahead it's there for many generations and permanently changes the character of the street. We strongly oppose it.

7. Planning Report clause 6.6 Building Siting and Overshadowing

Report statement *“Whilst winter shading will extend beyond the site immediately to the south (2 Patawalonga Frontage, Glenelg North) and onto **1C Patawalonga Frontage, Glenelg North, it is important to note that both sites currently contain dwellings nearing the end of their economic lifecycle** and, similar to this site, the property at 2 Patawalonga Frontage is highly likely to be redeveloped in the future, particularly as it is neither heritage-listed nor classed as a representative building”.*

This statement is totally false and misleading! 1C and 1B Patawalonga Frontage, Glenelg North is a 3-storey dual Torrens Title townhouse maisonette building that was completed in December 1999 – it is only 26 years old and is nowhere near the end of its economic lifecycle. This building has at least another 50 years, probably 75 years, before it would be considered nearing the end of its economic lifecycle! These two townhouses have separate titles and separate ownership.

There will be very significant overshadowing to the buildings at 2 and 1C Patawalonga Frontage, especially during winter. This will have a large effect to the lifestyle of the residents in these buildings and a large financial loss to their electricity generation from solar panels. Who will compensate these residences for their living and financial loss for decades to come? How can this proposed building that grossly violates zoning regulations be approved for the profit of the developer while causing decades of loss and reduction in property values to owners of neighbouring properties?

Report statement *“Additional shadow diagrams confirm that a building constructed within the DTS envelope on that site would, in fact, result in greater overshadowing of 1C Patawalonga Frontage, Glenelg North than the proposed development. Therefore, restricting this proposal on the basis of shadowing that is comparable, or even less than what future development would produce, would not constitute a sound planning outcome.”*

This statement is demonstrably false and totally misleading! The orange dashed line showing the DTS envelope overshadowing of 1C Patawalonga Frontage shows the opposite to this statement.

See final page of this objection letter (page 7 of 7) for these winter overshadowing details.

8. Redevelopment of 2 Patawalonga Frontage.

This 635 m² site is currently up for sale (auction to be held on Saturday 7th March 2026). If this 5-level building at 3 Patawalonga Frontage is approved, or even this approval is reduced to a 4-level building, it will set a precedence for 2 Patawalonga Frontage causing a cascading of these issues for the street and additional overshadowing of 1C and 1B Patawalonga Frontage.

9. Incorrect numbering of Dwelling Levels in the Planning Report.

The dwelling levels are located on levels 2, 3, 4, and 5. However, the Planning Report states they are located on levels 1, 2, 3, and 4 respectively – this is another incorrect and misleading representation to have it considered as a 4-level building (rather than a 5-level building).

10. Planning Report clause 4.3.2 and 4.3.3 specify two 3-bedroom Dwellings.

Dwelling 13 and Dwelling 14 (located on Level 5, not Level 4 as stated) are specified as each containing 3 bedrooms with two tandem car parking spaces. This is in stark conflict with the Architectural Plans that clearly show 2 bedrooms only for these two dwellings.

We can only conclude that this is yet another attempt to mislead the State Planning Commission to issue approval for a development that violates so many of the URN Zone regulations.

11. On-site parking for visitors does not meet the Planning and Design Code.

The Planning and Design Code has on-site parking requirements of 1 space per 2-bedroom dwelling (i.e. 14 spaces) and 0.33 spaces per dwelling for visitor parking (i.e. 5 spaces).

However, the 20 on-site basement car parks are allocated as 17 resident spaces (11 x single spaces and 3 x tandem parking spaces) resulting in only 3 visitor parks. This does not meet the minimum on-site visitor parking.

Also the specification is for 12 x 2-bedroom and 2 x 3-bedroom dwellings, and this requires 16 spaces for residents plus 5 spaces for visitors, a total of 21 spaces to meet the Planning and Design Code. Yet due to the configuration of the three tandem parking spaces (each needing to be allocated to one dwelling) it is not possible to achieve the required 5 parking spaces for visitors in this development. The only solution is to reduce the number of dwellings and levels in the development down to the URN Zone requirements.

12. Car Parking congestion in Patawalonga Frontage.

We know from experience that each residence will typically have two cars – so it is expected there will be around 28 (or more) resident's cars resulting in around 10 or more cars that will use off-site car parking for their permanent parking requirements. This is exactly what happened after the 2016 development of 14 townhouses at 5 Patawalonga Frontage with the street used for excess residential car parks most of the time.

This section of Patawalonga Frontage has street parking on the western side only, with barely enough space for 22 vehicles in total from King Street to Cygnet Court. Most of these are currently used by residents in 7 Patawalonga Frontage (The Moorings apartment complex) and by residents in 5 Patawalonga Frontage (14 townhouses) with peak usage outside working hours and on weekends. If this development proceeds there will be very little available street parking for excess resident's

cars and virtually no available street parking for our visitors and our neighbour's visitors. This will cause us and our neighbours considerable grief and make it very difficult for all of us to have visitors who typically come outside working hours and on weekends.

NOTE: High density housing typically doubles the driveway access width reducing the on-street parking capacity for an increased number of vehicles – this is becoming a critical issue in most Adelaide suburbs and must be addressed now to limit on-street car parking constraints for decades to come.

13. Car Parking congestion in the Marina Council Car Park

This car park has a total of 24 parking spaces (including one disabled parking space). Its primary function is to provide parking for guests of Marina boat owners when taking their boat out to sea. Its secondary function is to provide additional parking for Adelaide Scuba diving expeditions (Wed, Fri, Sat, Sun over the peak Spring/Summer/Autumn period), people attending/working at the many Holdfast Marina restaurants (not wanting to pay the high pricing from Wilson Parking in the car park underneath), and for people attending the many weekend functions at Wigley Reserve, Colley Reserve and other functional at Glenelg. This car park is usually at capacity on weekends and would likely lose up to half of its capacity for these primary and secondary functions if this development proceeds. We consider this totally unacceptable, especially considering the limited options for parking elsewhere in this vicinity.

14. Planning Report clause 6.10 Car Parking.

Report statement *"this development generates a theoretical demand for 19 spaces (14 for the prospective residents and five for their guests)"*

Yet the Planning Report specifies elsewhere that 17 of the 20 spaces in the car park will be allocated to residents leaving only 3 car parks for guests. Yet another inconsistency designed to mislead the decision makers into approving this development.

15. Planning Report clause 7 Conclusion.

Report statement *"the density, design, height and siting of the proposed building is appropriate, as it has been designed to mitigate visual and amenity impacts on surrounding properties"*

We strongly object to this statement as the height of the building is not appropriate as it grossly violates the URN Zone regulations, and will have massive visual and amenity impacts on surrounding properties.

16. Waste Management Plan clause 5.1 Bin Storage and Transfer Provisions

Report statement *"Given the constraints of the site, it is not feasible to accommodate a refuse collection vehicle on-site. It is therefore proposed that waste be collected by Council's waste contractor. The bulk bins are proposed to be wheeled from the bin room to Patawalonga Frontage by Council's contractor via the southern pathway adjacent the building."*

The street adjacent 3 Patawalonga Frontage will have resident cars parked in it virtually all the time. This means the hard rubbish truck will block the road every Friday for extended periods (for driver to wheel two bulk 660 litre rubbish bins out, empty them, and wheel back in) and the recycling rubbish truck will block the road every second Friday for a longer extended period (for driver to wheel three bulk 660 litre rubbish bins out, empty them, and wheel back in). This will be an

extended traffic hazard for all vehicles using this section of Patawalonga Frontage during these times.

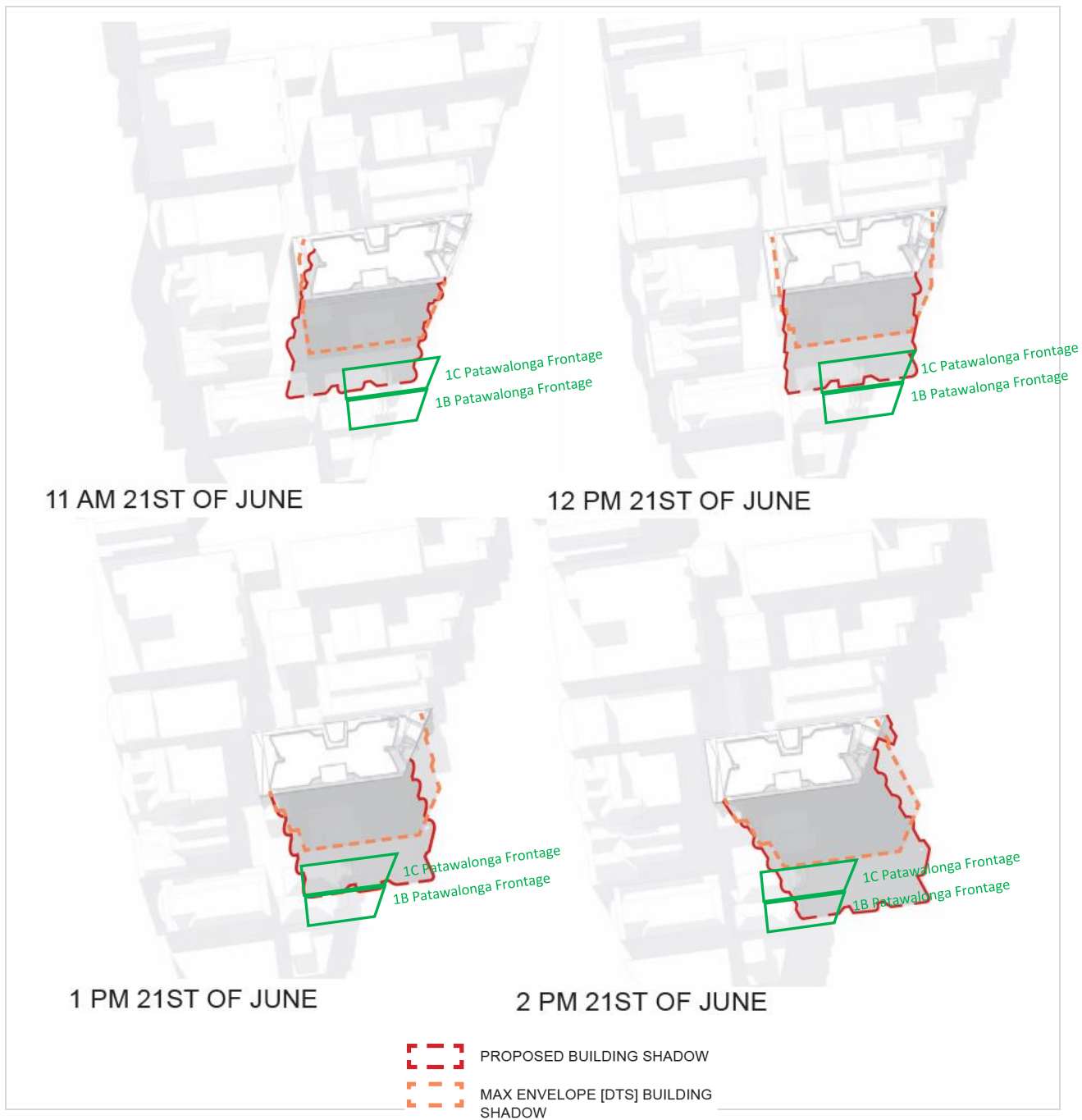
17. Stormwater Management Plan clause 1.2 Proposed Development

Report states *"The proposed development covers approx. 0.085ha and includes a 4-storey residential apartment building, and basement-level car parking."*

This statement is blatantly incorrect as the proposal is for a 5-storey residential apartment building, and basement-level car parking. Yet another attempt by the developers to obfuscate and misrepresent the application for the State Planning Commission to try and increase the chances of development approval.

Overshadowing of No. 2 and No. 1C Patawalonga Frontage during Winter





[attach additional pages as needed]

Note: In order for this submission to be valid, it must:

- be in writing; and
- include the name and address of the person (or persons) who are making the representation; and
- set out the particular reasons why consent should be granted or refused; and
- comment only on the performance-based elements (or aspects) of the proposal, which does not include the:
 - [Click here to enter text.](#) *[list any accepted or deemed-to-satisfy elements of the development]*.

I: ☒ wish to be heard in support of my submission*

☐ do not wish to be heard in support of my submission

By: ☒ appearing personally

☐ being represented by the following person: [Click here to enter text.](#)

**You may be contacted if you indicate that you wish to be heard by the relevant authority in support of your submission*



Signature:

Date: Tuesday 2nd March 2026

Return Address: GPO Box 1815, Adelaide SA 5001 *[relevant authority postal address]* or

Email: spcapplications@sa.gov.au *[relevant authority email address]* or

Complete online submission: plan.sa.gov.au/have_your_say/notified_developments

Representations

Representor 22 - Richard and Laura Stranger

Name	Richard and Laura Stranger
Address	1A PATAWALONGA FRONTAGE GLENELG NORTH SA, 5045 Australia
Submission Date	16/03/2026 05:47 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 oppose the development
Reasons See attached	

Attached Documents

RepresentationDevelopmentNumber25040461RLStranger040326002-13761482.pdf

REPRESENTATION ON APPLICATION

Planning, Development and Infrastructure Act 2016

Applicant:	Okin Capital C/- Enzo Caroscio Architecture
Development Number:	25040461
Nature of Development:	Five-level residential flat building containing 14 dwellings, basement car parking and landscaping
Zone/Sub-zone/Overlay:	Urban Renewal Neighbourhood
Subject Land:	3 Patawalonga Frontage GLENELG NORTH SA 5045 Title Ref: CT5842/93 Plan Parcel: F1091AL41
Contact Officer:	State Planning Commission
Phone Number:	1800 752 664
Close Date:	Thursday 5 March 2026

My name*: Richard & Laura Stranger	My phone number: 0466 960 866
My postal address*: 1A Patawalonga Frontage GLENELG NORTH SA 5045	My email: richie@adam.com.au

* Indicates mandatory information

My position is:	☐ I support the development
	☐ I support the development with some concerns
	☒ I oppose the development

The specific reasons we believe that consent should be refused are:

We object to the approval of the proposed apartments at 3 Patawalonga Frontage, Glenelg North on the basis that:

- The proposed 5-storey development is significantly at variance to the prescribed maximum building height of 3-levels and the density limit of 70 dwellings per hectare and will have a significant detrimental impact on the amenity of the immediate locality.*
 - PO 2.1 requires that buildings are "generally 2-3 levels with taller buildings located on sites that are a suitable size and dimension to manage massing and impacts on adjoining residential development".*
DTS/DPF 2.1 allows for a building height "no greater than" 3-levels or 11.5m.
 - DTS/DPF 2.1(b) (i) allows additional building height to 4-levels for lots greater than 1200m² in area and a frontage of 35m or (ii) 3 building levels in all other circumstances. With a site area of 854m² and a frontage of 21m, 3 Patawalonga Frontage falls significantly short of these requirements.*
 - DTS/DPF 3.2 of The Planning and Design Code also provides for uplift of one additional level where affordable housing is provided. The Planning Report states that no Affordable Housing will be provided, therefore the building height increase of one additional level does not apply to this application.*



Government of South Australia

Department for Housing
and Urban Development

- 4) *The immediate and most relevant context is the section of Patawalonga Frontage extending from King Street the North to the apartments fronting 1 North Esplanade to the South. The only building of greater height than 3-storeys within this area is 'The Moorings' on the corner of King Street and Patawalonga Frontage which has a small 4th level with substantial setbacks to reduce the visual impact. The corner location of the 4th level also has no impact on adjoining properties. Without exception, buildings in the vicinity use podiums, upper level setbacks and other visual cues to reduce the impact of upper levels. All other buildings along this section of Patawalonga Frontage are 3 levels or less including every house within Cygnet Court immediately to the South.*
 - 5) *Most of the buildings proposed to demonstrate 'Existing Overheight' (Architectural Drawings Page 5) were either constructed under a previous planning framework and/or are located within a different zone which specifically allows greater height. These 'overheight' examples are also located on significantly larger land parcels which allow for greater setbacks on all boundaries. Older buildings demonstrating urban design qualities that would not comply with the requirements of the current Planning and Design Code have little relevance to justify further non-complying outcomes. The horse has not "effectively bolted" from this section of Patawalonga Frontage which to date has been sensitively developed generally in conformance with the current requirements of the Planning and Design Code.*
 - 6) *PO 8.1 and DTS/DPF 8.1 allow for medium density housing with a net density of **up to 70** dwellings per hectare. The application at 3 Patawalonga Frontage results in a net density of 164 dwellings per hectare, more than double the limit established by the Planning and Design Code. The subject land is not of sufficient size to apply the density uplift beyond 70 dwellings per hectare where sites have a minimum area of 1200m² and minimum frontage of 35m.*
 - 7) *The property would have been purchased in the clear knowledge that a 3-level height limit and 70 dwellings per hectare density limits apply to the subject site. The Planning and Design Code must be applied consistently to ensure certainty for residents, to remove ambiguity for developers and to avoid setting a precedent for the potential future redevelopment of similar properties.*
2. *Visitor parking is insufficient and is located behind a roller door and will not be accessible to visitors.*
- 1) *A total of 20 carparks are provided at Basement level although 3 carparks are not available to other than the resident as they are tandem parks and therefore provide no opportunity for visitor parking. Therefore, there are only 17 car parks available. 14 carparks are required for the apartments (assuming all apartments are 2-bedrooms) and a further 5 visitor parks the total required is therefore 19 car parks. Excluding the 3 tandem parks, the proposal is deficient by 2 carparks. As all carparks are located behind a roller door no carparks will be accessible to visitors.*
 - 2) *Contradictory information within the Planning Report refers to 3-bedroom apartments at the upper level suggesting that this is a future consideration which will put further pressure on local parking.*
 - 3) *Existing on-street parking is limited to the Western side of Patawalonga Frontage and public car parking in the area is already at capacity on many evenings, most weekends and during the many events held in the vicinity which already puts pressure on existing parking. Overflow parking from any new development must comply with owner and visitor parking requirements to ensure that the existing marina and dive shop operations are not detrimentally impacted.*
3. *Insufficient Front Setback*
- 1) *The balconies to the South-Eastern apartments appears to exceed the maximum allowable intrusion of 1.5m into the required 3-metre front boundary setback. Due to the angle of the front boundary, this is the most intrusive point of the building. Most buildings*

along Patawalonga Frontage are designed to address the angle to provide greater front setbacks to reduce the impact of the building on the street.

4. *Privacy and overlooking*

- 1) *Upper level windows and balconies to the North, South and West Elevations have not been designed to reduce overlooking as required by PO 10 and DTS/DPF 10.1 which requires permanently obscured glazing or sill heights greater than 1.5m above finished floor level. This will significantly impact the amenity of adjoining properties.*

We support the redevelopment of suitable well-located urban land to achieve housing diversity and density increases subject to compliance with the requirements of the Planning and Design Code as outlined above.

Our objection can be largely resolved by:

- 1) *Enforcing the 3-level height limit,*
- 2) *Providing sufficient visitor car parking which is directly accessible to visitors, and*
- 3) *Ensuring compliance with overlooking requirements.*

[attach additional pages as needed]

Note: In order for this submission to be valid, it must:

- be in writing; and
- include the name and address of the person (or persons) who are making the representation; and
- set out the particular reasons why consent should be granted or refused; and
- comment only on the performance-based elements (or aspects) of the proposal

I: ☐ wish to be heard in support of my submission*
☒ do not wish to be heard in support of my submission

By: ☐ appearing personally
☐ being represented by the following person: [Click here to enter text.](#)

**You may be contacted if you indicate that you wish to be heard by the relevant authority in support of your submission*



Signature:

Date: 3 March 2026

Return Email Address: scapreps@sa.gov.au

Representations

Representor 23 - Ann Ewer

Name	Ann Ewer
Address	UNIT 9 11-12 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	16/03/2026 05:50 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 oppose the development
Reasons See attached	

Attached Documents

AnnEwerRep-13761496.pdf

Ann Ewer
9/11-12 North Esplanade
Glenelg North SA 5045
Tel: 0414 364 100
E: annewer9@gmail.com

3 March 2026

State Planning Commission
GPO Box 1815
ADELAIDE SA 5001

TO WHOM IT MAY CONCERN

RE: Proposed Development Application ID25050561
3 Patawalonga Frontage, Glenelg North SA 5045

We absolutely object to this development. It is a non-complying, gross overdevelopment of the site and does not fit in with the existing streetscape.

The developer has circumvented the normal process of seeking approval from Council in the first instance. I understood that an approach direct to State Planning was purely for major projects, which surely this is not a major project. This approach is merely to avoid Council regulations.

In addition, our reasons are:

- This development totally contravenes the existing building planning regulations.
- There are only 20 car parks (6 of which are tandem style) allocated for 14 units. I thought the State Government was bringing in a law where every property had to provide two off-street car parks per dwelling.
I am unable to determine how many car parks are provided for Visitors, which regulations stipulate a required number. There is very limited street parking in the area and this development will create major problems in a very narrow street.
- It is in fact a 6 storey development, not five.
- The entire site is being developed, which will add pressure to the local storm water systems, which already struggle to cope in heavy rain conditions.

This proposal is only of benefit to the developer.

This proposal definitely should NOT be approved. There is plenty of scope for a complying development.

Yours faithfully



Ann Ewer

Representations

Representor 24 - Laurie and Veronika Hearn

Name	Laurie and Veronika Hearn
Address	UNIT 6 6 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	17/03/2026 09:22 AM
Submission Source	Post
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 See attached	

Attached Documents

Representationdevelopmentnumber25040461lvhearn-13763914.pdf

OK 1

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

3 Patawalonga Frontage Glenelg Nth 5045

I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

The Holdfast Bay Planning and Design Code 2016 was adopted by the correct procedure of exhibition, comment, and approval by the State Planning Authority in 2016.

The King St./Patawalonga Frontage/North Esplanade 'the triangle' is almost fully developed with homogenous design, and the residents **overwhelmingly** endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

Summary of the Objections:

- 1 The proposal does not satisfy the terms of Permissible Development under the zoning.
- 2 There is no impediment to a complying development under the existing Council zoning.
- 2 The proposal is a GROSS OVERDEVELOPMENT by a factor of 250% to 280%.
- 3 The proposal describes existing -2floors with garage under as '3 floors', 3 floors with garage under, as '4 floors', **but fails to describe the 5-story proposal with parking as SIX FLOORS**
- 4 The 'photographic' representations p5' Precinct Context and p29 Precedents and Materiality are designed to **Mislead the Planning Commission** with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. the balance of samples are irrelevant as they are NOT in this precinct, 40yo pre zoning, on opposite side of the river, different Zoning and one is 400m away!
- 5 NO LANDSCAPING - the garage 'bunker' extends from boundary to boundary a meter above ground level plus vehicle driveway, paths, and power transformer **covering 95% of the site in concrete! --- precluding** the illustrated "11-and-12-meter trees" ????
- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Page by page comment on Application

The detailed investigation of the Application, reveals the following conflicts with the planning parameters of 'THE TRIANGLE'

Page 3 'Site Context' clearly the street scape DOES NOT IN ANY WAY CONFORM WITH A PROPOSAL FOR A SIX STORY DEVELOPMENT!!!

Page 4 "Precinct Context" The overall view of "the triangle" that was specifically excised out of the nearby zoning and confirmed as CONTINUING to welcome 3 story with garage under . There are a variety of building solutions all carefully vetted and approved by the local council over the years.

Good planning has encouraged variations to avoid a "barracks" or 'Boxlike' solution to development which has resulted in partial height increases offset against generally lower heights and /or complete subterranean car parking.

THIS HAS NOT PRODUCED AN ENVIRONMENT WHERE A SIX STORY BUILDING IS IN ANY WAY ACCEPTABLE!

Page 5 Precinct Context 'Existing Over height' The precinct is clearly defined by the exise of **"The Triangle"** out of the general Council Plan **ie King St, Patawalonga Frontage, North Esplanade** ,at the time of adoption of the council plan after proper consultation and exhibition.

The photos presented on Page 5 are obvious misrepresentations designed to mislead the Planning Commission.

A couple of photos show edited parts of buildings that are variations as outlined in the architectural give and take as outlined above !!

There are examples of recently completed 7-8 level developments on the other side of the River with totally different planning parameters!

One building outside this zone was built 40 years ago prior to any cohesive planning and prior to formation of this council!

Another is built on the edge of a commercial zoning almost 400 meters away!!!

These 'examples' totally lack credibility when considering a site conforming to the zoning within 'the triangle'

Page6 Extols the benefits of SUNLIGHT AND VIEWS pertaining to the proposed development

BUT IS SILENT on the obvious detrimental effect on surrounding buildings by the imposition of a SIX STORY building amongst the much lower , **conforming developments** in the triangle

Page 7 'Existing Site Context' demonstrates the complete lack of SIX STORY buildings in the locality

Page 13 "Basement" shows limited access height of "1900 OR LESS" in an environment where the top selling vehicles are 'Ford Ranger' or similar large 'trucks'

Page 17 **No AIRCONDITIONING** in evidence on any of pages 13, 14, 15, 16, or 17

2/3

Does this indicate an intention for residents to retrofit 1960's metal boxes in every window ?

The low ceiling heights proposed with minimum slabs and apparent lack of ceiling space do not appear to allow for any ducting ?

Page 20 **'IllusionaryTrees'** 4 stories tall growing out of concrete on the boundary to boundary concrete bunker and the 95 % concrete coverage[when including drive way ,electricity Transformer, Paths ,garbage access ,stairs]

Page 22 Once misdescription of proposal as 5 story instead of SIX STORY with no acknowledgement of the boundary to boundary 'bunker'

Page 23 the streetscape needs recognition of North Esplanade constructed on the top of a sand dune and Patawalonga Frontage an historic floodprone river plane .

Page 24 appears to be a nonsense that sounds good "" a water retention initiative on a flat concrete rooftop that is covered with solar panels?

Page 29 Precedents and Materiality Photos of buildings NONE OF WHICH ARE IN THIS AREA OR REMOTELY EXQUIVALENT TO ANY PART OF THE AREA IN QUESTION ! IS THIS MEANT TO DECIEVE?

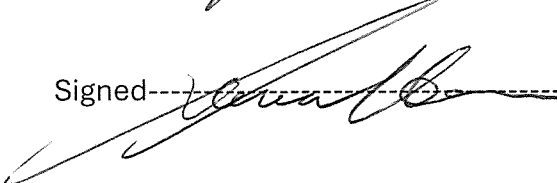
Page 30 'Offset windows to 'prevent looking in' but looking into bedrooms of No 6 at rear ✗

Very scenic "hanging gardens" a figment of imagination an inspection of the surrounding developments underlines the impossibility of such adornment in the harsh coastal weather!!

THE NONCOMPLYING DEVELOPMENT SHOULD BE REFUSED WITH A RECCOMENDATION THAT THE APPLICANT BE REFERRED TO THE CORRECT AUTHORITY BEING THE HOLDFAST BAY COUNCIL.

Name/s LAVIE & VERONICA HEARN

Address 6/6 NORTH ESPLANADE GLENELG NT

Signed  

Representations

Representor 25 - Mary Louise McCann

Name	Mary Louise McCann
Address	UNIT 2 5 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	17/03/2026 09:26 AM
Submission Source	Post
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 See attached	

Attached Documents

Representationdevelopmentnumber25040461mmccann-13763989.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

The Holdfast Bay Planning and Design Code 2016 was adopted by the correct procedure of exhibition, comment, and approval by the State Planning Authority in 2016.

The King St./Patawalonga Frontage/North Esplanade 'triangle' is almost fully developed with homogenous design, and the residents **overwhelmingly** endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

Summary of the Objections:

- 1 The proposal does not satisfy the terms of Permissible Development under the zoning.
- 2 There is no impediment to a complying development under the existing Council zoning.
- 2 The proposal is a GROSS OVERDEVELOPMENT by a factor of 250% to 280%.
- 3 The proposal describes existing -2floors with garage under as '3 floors', 3 floors with garage under, as '4 floors', **but fails to describe the 5-story proposal with parking as SIX FLOORS**
- 4 The 'photographic' representations p5' Precinct Context and p29 Precedents and Materiality are designed to **Mislead the Planning Commission** with samples of partial extra height offset against lower height, development into roof space within height limit with subterranean carpark etc. the balance of samples are irrelevant as they are NOT in this precinct, 40yo pre zoning, on opposite side of the river, different Zoning and one is 400m away!
- 5 NO LANDSCAPING - the garage 'bunker' extends from boundary to boundary a meter above ground level plus vehicle driveway, paths, and power transformer **covering 95% of the site in concrete!** --- **precluding** the illustrated "11-and-12-meter trees" ????
- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s-----

Mary Louise McCann (owner)

Address-----

Unit 2, 5 North Esplanade Glenelg North

Signed-----

Representations

Representor 26 - Peter Bucklow

Name	Peter Bucklow
Address	UNIT 35 8-9 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	17/03/2026 09:29 AM
Submission Source	Post
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 See attached	

Attached Documents

Representationdevelopmentnumber25040461pbucklow-13764049.pdf



To State Planning Commission GPO Box 1815 Adelaide SA 5000:

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

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- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s-----PETER BUCKHAW-----

Address-----35/8-9 NORTH ESPLANADE, GLENELG NORTH-----

Signed-----Pete Buckhaw-----

P.T.O.,

We had previously been advised by the Council
that any development would be limited to three floors!
We are strongly against this development!

Representations

Representor 27 - John and Anne Barker

Name	John and Anne Barker
Address	2 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	17/03/2026 09:32 AM
Submission Source	Post
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 See attached	

Attached Documents

Representationdevelopmentnumber25040461jabarker-13764125.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461



3 Patawalonga Frontage Glenelg Nth 5045

I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

The Holdfast Bay Planning and Design Code 2016 was adopted by the correct procedure of exhibition, comment, and approval by the State Planning Authority in 2016.

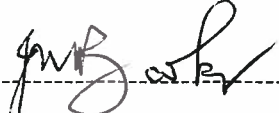
The King St./Patawalonga Frontage/North Esplanade 'triangle' is almost fully developed with homogenous design, and the residents **overwhelmingly** endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

Summary of the Objections:

- 1 The proposal does not satisfy the terms of Permissible Development under the zoning.
Council's desire is to taper down the height from King Street to the southern end of North Esplanade!
- 2 There is no impediment to a complying development under the existing Council zoning.
- 2 The proposal is a GROSS OVERDEVELOPMENT by a factor of 250% to 280%.
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Name/s JOHN BARKER, ANNE BARKER

Address 2 NORTH ESPLANADE, GLENELG NORTH SA 5045

Signed  

Representations

Representor 28 - Lorna Karjalainen and Matti Pentinkorpi

Name	Lorna Karjalainen and Matti Pentinkorpi
Address	UNIT 15 4 KING STREET GLENELG NORTH SA, 5045 Australia
Submission Date	17/03/2026 09:39 AM
Submission Source	Post
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 See attached	

Attached Documents

Representationdevelopmentnumber25040461lkarjalainenmpentinkorpi- 13764269.pdf



To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

~~we~~ Object to the **SIX STORY PROPOSAL** and seek to have it refused.

The Holdfast Bay Planning and Design Code 2016 was adopted by the correct procedure of exhibition, comment, and approval by the State Planning Authority in 2016.

The King St./Patawalonga Frontage/North Esplanade 'triangle' is almost fully developed with homogenous design, and the residents **overwhelmingly** endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

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Name/s LORNA KARTALAINEN / MATTI PENTINKORPI

Address 15 / 4 KING STREET, GLENELG NTH 5045

Signed L. Kujala, Matti Penttinkorpi

Representations

Representor 29 - Ashley Tolmer

Name	Ashley Tolmer
Address	UNIT 14 4 KING STREET GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:17 AM
Submission Source	Post
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

AshleyTolmer-13778554.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



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Name/s

Ashley Tolme

Address

14/4 King St, Glenelg North 5045

Signed

A. J. Tolme

PTO

Patawalonga Frontage. is a narrow street. Already it can be quite narrow to drive down due to parked cars.

It can also be a very busy street when activities are held on the Colley Reserve or Wigley Reserve.

This will also add to more congested parking on King St which is a very busy thoroughfare.

A. J. Palmer.

Representations

Representor 30 - Bill and Anne May

Name	Bill and Anne May
Address	UNIT 20 7 PATAWALONGA FRONTAGE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:19 AM
Submission Source	Post
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 See attached	

Attached Documents

BillAndAnneMay-13778628.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

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The King St./Patawalonga Frontage/North Esplanade 'triangle' is almost fully developed with homogenous design, and the residents **overwhelmingly** endorsed the retention of current zoning and development parameters. [only the two least attractive historically flood prone sites remain]

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Name/s-----

BILL & ANNE MAY

Address-----

APT 20 / 7 PATAWALONGA FRONTAGE G. NTH

Signed-----

WRMg

ANMg

Concerns Relating to development ID 25040461

Parking and traffic

On street parking seems to be fully utilized and I am concerned that this building will add to to further congestion on this portion on the Patawalonga Frontage. The developer could Add Parking to the development without adding Height to the building by installing an undercover parking similar to that of "The Moorings" Building.

Water Pressure

There is also evidence that water pressure in this street is approaching, or has approached low levels of pressure, this is a safety concern as the high-rise buildings in the area require sufficient pressure to allow their fire sprinklers to work efficiently

Bill May and Anne May

Apt 20 7 Patawalonga Frontage

Glenelg North

O419866676

Bill May

A handwritten signature in black ink, appearing to read 'Bill May', with a stylized, cursive script.

Anne May

A handwritten signature in black ink, appearing to read 'Anne May', with a stylized, cursive script.

Representations

Representor 31 - Margaret Hokin

Name	Margaret Hokin
Address	UNIT 9 1 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:24 AM
Submission Source	Post
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 See Attached	

Attached Documents

MargaretHokin-13778770.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

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- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s- MARGARET HOKIN

Address- 9/1 NORTH ESPLANADE GLENELG NORTH

Signed- Margaret Hokin

Representations

Representor 32 - Pamela and Anthony Davis

Name	Pamela and Anthony Davis
Address	APARTMENT 30 7 PATAWALONGA FRONTAGE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:26 AM
Submission Source	Post
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 See attached	

Attached Documents

PamelaAndAnthonyDavis-13778825.pdf



To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

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Name/s-----

Pamela & Anthony Davis

Address-----

30/7 Patawalonga Frontage North
Glenelg

Signed-----

P Davis A Davis

Representations

Representor 33 - Glenn and Melanie Minear

Name	Glenn and Melanie Minear
Address	31 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:29 AM
Submission Source	Post
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 see attached	

Attached Documents

GlennAndMalanieMinear-13778905.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

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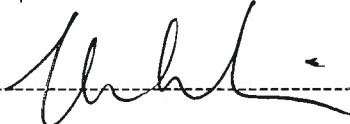
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Name/s GLENN + MELANIE MINEAR

Address 31/8 NORTH ESPLANADE, GLENELG NORTH

Signed  

Representations

Representor 34 - Sep Barila

Name	Sep Barila
Address	UNIT 6 1 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:31 AM
Submission Source	Post
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 see attached	

Attached Documents

SeppBarilla-13778935.pdf

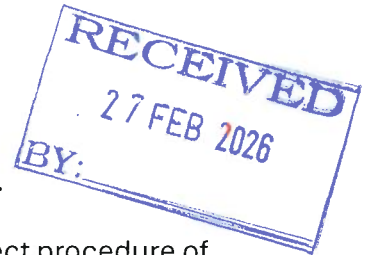
Totally Disagree with this Development Application

25/2/26

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

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Name/s SEPP BARUA

Address APARTMENT 6/1 NORTHESPLANADE GLENELG NORTH 5045

Signed [Signature] 25/02/26

Representations

Representor 35 - Ann Hill

Name	Ann Hill
Address	UNIT 2 6 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:38 AM
Submission Source	Post
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 see attached	

Attached Documents

AnnHill-13779106.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

3 Patawalonga Frontage Glenelg Nth 5045



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Name/s-----

ANN HILL

Address-----

2/6 North Esplanade Glenelg Nth
5045

Signed-----

Ann Hill.

Representations

Representor 36 - Jane and David Birch

Name	Jane and David Birch
Address	UNIT 17 8-9 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:40 AM
Submission Source	Post
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 see attached	

Attached Documents

JaneAndDavidBirch-13779128.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5006

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



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Name/s-----

Jane + David Birch

Address-----

17/ 8-9 North Esplanade Glenelg North

Signed-----

JBirch

DBirch

Representations

Representor 37 - Ann Wilkins

Name	Ann Wilkins
Address	UNIT 1 5 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:42 AM
Submission Source	Post
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 see attached	

Attached Documents

AnnWilkins-13779210.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

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Name/s----- ANN WILKINS -----

Address----- 1/5 NORTH ESPLANADE GLENELG NORTH -----

Signed----- Ann Wilkins -----

Representations

Representor 38 - Kay and Brian Carey

Name	Kay and Brian Carey
Address	UNIT 4 4 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:43 AM
Submission Source	Post
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 see attached	

Attached Documents

KayAndBrianCarey-13779229.pdf

1
To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

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Name/s----- Kay + Brian Carey

Address----- 4/4 North Esplanade Glenelg North

Signed----- K.E. Carey

3 or 4 levels Only.

Representations

Representor 39 - Michael Tattoli

Name	Michael Tattoli
Address	UNIT 6 4 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:45 AM
Submission Source	Post
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 see attached	

Attached Documents

MichaealTattoli-13779271.pdf
MichaealTattoli-13780121.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

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Name/s MICHAEL TATTOLI

Address 6/4 NORTH ESP GLENELG 5040

Signed Michael Tattoli

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

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Name/s MICHAEL TATTOLI

Address 6/4 NORTH ESP GLENELG 5040

Signed Michael Tattoli

Representations

Representor 40 - Astrid Erb

Name	Astrid Erb
Address	UNIT 24 8-9 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:48 AM
Submission Source	Post
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 see attached	

Attached Documents

AstridErb-13779304.pdf
AstridErb-13780068.pdf

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Name/s Astrid Erb

Address 24 / 8-9 North Esplanade, Glenelg North SA 5048

Signed A. Erb

To State Planning Commission GPO Box 1815 Adelaide SA 5000

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Name/s Astrid Erb

Address 24 / 8-9 North Esplanade, Glenelg North SA 5048

Signed A. Erb

Representations

Representor 41 - Michael and Sarah Goldblatt

Name	Michael and Sarah Goldblatt
Address	42/8-9 North Esplanade GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:52 AM
Submission Source	Post
Late Submission	No
Would you like to talk to your representation at the decision-making hearing for this development?	No
My position is	I oppose the development
Reasons	

Attached Documents

MicahelAndSarahGoldblatt-13779398.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

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- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s----- MICHAEL and SARAH GOLDBLATT -----

Address----- 42/8-9 NORTH ESPLANADE 5045 -----

Signed----- M Goldblatt -----

P70

Representations

Representor 42 - Christal Dimaglidis

Name	Christal Dimaglidis
Address	APARTMENT 4 5 PATAWALONGA FRONTAGE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:53 AM
Submission Source	Post
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 see attached	

Attached Documents

ChristalDimaglidis-13779437.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

3 Patawalonga Frontage Glenelg Nth 5045



I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

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Name/s-----

Christal Dimaglis

Address-----

Town house 4/5 Patawalonga Frontage
Glenelg North - 5045

Signed-----

Dimaglis

Representations

Representor 43 - Julia Hill Kregar

Name	Julia Hill Kregar
Address	1 North Esplanade GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:55 AM
Submission Source	Post
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 see attached	

Attached Documents

JuliaHillKregar-13779464.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



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Name/s- JULIA HILL KREGAR

Address- 1 NORTH ESPLANADE, GLENELG

Signed- [Signature] NORTH

Representations

Representor 44 - Mark Burns

Name	Mark Burns
Address	UNIT 5 11-12 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:57 AM
Submission Source	Post
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 see attached	

Attached Documents

MarkBurns-13779513.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



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Name/s-----

MARK BURNS

Address-----

APARTMENT 5, 11/12 NORTH ESPLANADE, GLENELG

Signed-----

MB

Representations

Representor 45 - Julie Burns

Name	Julie Burns
Address	UNIT 5 11-12 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:58 AM
Submission Source	Post
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 see attached	

Attached Documents

JulieBurns-13779539.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



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Name/s-----

JULIE BURNS

Address-----

APARTMENT 5, 11/12 NORTH ESPLANADE, GLENELG

Signed-----

Representations

Representor 46 - Margaret Del Fabbro

Name	Margaret Del Fabbro
Address	UNIT 1 4 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 09:59 AM
Submission Source	Post
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 see attached	

Attached Documents

MargaretDelFabbro-13779567.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000
Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



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Name/s MARGARET DEL FABRO

Address Unit 1 - 4 North Esplanade, Glenelg North
5045

Signed Margaret Del Fabro

Representations

Representor 47 - Jon and Lyn Trenwith

Name	Jon and Lyn Trenwith
Address	APARTMENT 21 7 PATAWALONGA FRONTAGE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:01 AM
Submission Source	Post
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 see attached	

Attached Documents

JonAndLynTrenwith-13779603.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



I/we Object to the **SIX STORY PROPOSAL** and seek to have it refused.

The Holdfast Bay Planning and Design Code 2016 was adopted by the correct procedure of exhibition, comment, and approval by the State Planning Authority in 2016.

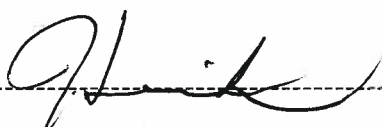
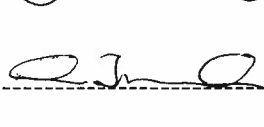
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Name/s-----Jon & Lyn Trenwith-----

Address-----21/7 Patawalonga Ftg Glenelg North 5045-----

Signed----- -----

Representations

Representor 48 - Halia C Silins and William T Lucas

Name	Halia C Silins and William T Lucas
Address	UNIT 6 10 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:03 AM
Submission Source	Post
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 see attached	

Attached Documents

HaliaSilinsAndWilliamLucas-13779640.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045



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Name/s-

Helia C. Silins + William T. Lucas

Address-

6/10 North Esplanade Glenelg North

Signed-

Helia C. Silins William T. Lucas

We ABSOLUTELY ENDORSE THESE OBJECTIONS. THANKS FOR YOUR CONSIDERATION.

Representations

Representor 49 - Suzette Butler

Name	Suzette Butler
Address	UNIT 3 6 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:05 AM
Submission Source	Post
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 see attached	

Attached Documents

SuzetteButler-13779672.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461



N03- 3 Patawalonga Frontage Glenelg Nth 5045

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Name/s-----

Address-----

Signed-----

Suzette Butler

316 North Esplanade Glenelg North SA
5045

Representations

Representor 50 - Marilyn Ann Mitchell

Name	Marilyn Ann Mitchell
Address	UNIT 1 6 NORTH ESPLANADE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:06 AM
Submission Source	Post
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 see attached	

Attached Documents

MarilynMitchell-13779732.pdf



To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

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Name/s-----

Marilyn Ann Mitchell

Address-----

1/6 NORTH ESPRANADE GLENELG NORTH 5045

Signed-----

[Signature]

Representations

Representor 51 - Emma-Jane Sutter

Name	Emma-Jane Sutter
Address	APARTMENT 10 7 PATAWALONGA FRONTAGE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:08 AM
Submission Source	Over Counter
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 see attached	

Attached Documents

EmmaJaneSutter-13779780.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

3 1/2 Patawalonga Frontage Glenelg Nth 5045

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Name/s--- Emma-Jane Sutter

Address--- Unit 10/7 Patawalonga Frontage
Glenelg North. SA. 5045

Signed--- Emma Sutter

~~***~~ I completely oppose the proposed development.

Representations

Representor 52 - K J Swan

Name	K J Swan
Address	26/8-9 North Esplanade GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:10 AM
Submission Source	Over Counter
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 see attached	

Attached Documents

KjSwan-13779810.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

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Name/s----- K.J. SWAN-----

Address----- u26 / 8-9 North Esplanade, GLENELG NTH 5045-----

Signed----- K. Swan-----

I totally concur with all the comments above and believe that this proposed structure is totally inappropriate for this small pocket of Glenelg North AS.

Representations

Representor 53 - Franco Napoli

Name	Franco Napoli
Address	4 PATAWALONGA FRONTAGE GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:12 AM
Submission Source	Over Counter
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 see attached	

Attached Documents

FrancoNapoli-13779841.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

3 Patawalonga Frontage Glenelg Nth 5045

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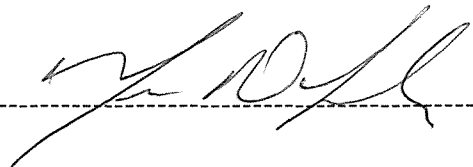
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- 6 As residents we can confirm that the illusion of lush hanging gardens in non-existent planter boxes do not survive the harsh Coastal winds!

Name/s-----FRANCO NAPOLI-----

Address-----4 PATAWALONGA FRONTAGE GLENELG NORTH-----

Signed----------

Representations

Representor 54 - Jacqueline Scholz

Name	Jacqueline Scholz
Address	UNIT 3 4 KING STREET GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:13 AM
Submission Source	Over Counter
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 see attached	

Attached Documents

JacquelineScholz-13779881.pdf

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

✍ 3 ✖ Patawalonga Frontage Glenelg Nth 5045

I/✖ Object to the **SIX STORY PROPOSAL** and seek to have it refused.

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Name/s-----Jacqueline Scholz-----

Address-----Apt. 3/4 King Street, Glenelg North, SA, 5045.-----

Signed-----Jo Scholz-----

Representations

Representor 55 - Lisa Gower

Name	Lisa Gower
Address	41/8-9 North Esplanade GLENELG NORTH SA, 5045 Australia
Submission Date	18/03/2026 10:17 AM
Submission Source	Post
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 see attached	

Attached Documents

LisaGower-13779983.pdf



To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

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Name/s----- DR LISA GOWER

Address----- 41/8-9 NORTH ESPLANADE, GLENELG NORTH SA

Signed----- 

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

~~3.5~~ Patawalonga Frontage Glenelg Nth 5045

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Name/s-----

Tamryn & David Alley

Address-----

4/1 North Esplanade Glenelg North

Signed-----

[Signature]

To State Planning Commission GPO Box 1815 Adelaide SA 5000

Re Proposed Development Application ID 25040461

5 Patawalonga Frontage Glenelg Nth 5045

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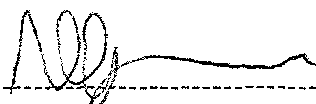
Name/s-----

Vicki Greaves

Address-----

Unit 4 10 North Esplanade Glenelg North 5045

Signed-----



To State Planning Commission GPO Box 1815 Adelaide SA 5000

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Name/s Christine Rayner

Address 8-9 North Esplanade
North Glenelg,

Signed CR