



ACKNOWLEDGEMENT TO COUNTRY

Ekistics respectfully acknowledges the traditional owners and custodians of the land on which we work and we pay our respects to Elders past and present.



PROPRIETARY INFORMATION STATEMENT

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Revision	Description	Author	Date
Version 1	Draft Planning Statement	BS	14 February 2025
Version 2	Draft Planning Statement	BS	19 March 2025
Version 3	Review Draft Planning Statement	RT / BS	20 March 2025
Final	Planning Statement	BS	20 March 2025

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1. EXECUTIVE SUMMARY

Category	Details
PROJECT	Festival Plaza Tower 2
ADDRESS OF SITE	Festival Plaza, Adelaide
FIRST NATIONS COUNTRY	Kaurna
CERTIFICATE OF TITLE	Certificate of Title Volume 6277 Folio 532 (Allotment 602 Deposited Plan 128908)
LOCAL GOVERNMENT	City of Adelaide
RELEVANT AUTHORITY	State Planning Commission delegated to the State Commission Assessment Panel (SCAP)
PLANNING AND DESIGN CODE	Version 2025.5 (Published on 13 March 2025)
ZONE	City Riverbank Zone
SUBZONE	Entertainment Subzone
OVERLAYS	<ul style="list-style-type: none"> • Airport Building Heights (Regulated) (All structures over 90 metres AHD) / (All structures over 100 metres AHD) / (All structures over 110 metres AHD) • Building Near Airfields • Design • Heritage Adjacency • Hazards (Flooding - Evidence Required) • Noise and Air Emissions • Prescribed Wells Area • Regulated and Significant Tree • State Heritage Place (1370 – Adelaide Festival Centre) • State Heritage Place (1639 – Adelaide Railway Station) • State Heritage Place (1641 – Parliament House)
TECHNICAL & NUMERIC VARIATIONS (TNVs)	Concept Plan (Concept Plan 153 – City Riverbank – Festival Plaza)
EXISTING USE	Vacant former public plaza & approved for a three storey retail pavilion building as part of the former DA 020 /A012/16.

Category	Details
PROPOSAL DESCRIPTION	Construction of a 38 storey mixed use building comprising 'office', 'shop', 'civic space and office', 'hotel' uses and an elevated public plaza, nomination of three (3) signage zones with ancillary landscaping and solar photovoltaic panels (roof mounted) and associated alterations to basement and public plaza
CLASSIFICATION OF DEVELOPMENT	<div>Offices</div> <div>Shop</div> <div>Civic space and office</div> <div>Hotel (Licensed Premises)</div> <div>Advertising displays</div> <div>Public realm works</div> <div>Solar photovoltaic panels (roof mounted)</div>
PUBLIC NOTIFICATION	Excluded from public notification pursuant to Clause 2 of Table 5 (Procedural Matters – Notification) of the City Riverbank Zone.
REFERRALS	<ul style="list-style-type: none"> Government Architect Heritage SA (DEW) Adelaide Airport Limited City of Adelaide
APPLICANT	Walker Riverside (Retail) Pty Ltd
CONTACT PERSON	Ben Schnell (BS) – Planning Consultant
OUR REFERENCE	01473-007

2. PROJECT UNDERSTANDING

This planning statement has been prepared in support of a development application by 'Walker Riverside (Retail) Pty Ltd' ('the applicant') to construction of a 38 storey mixed use building comprising 'office', 'shop', 'civic office', 'hotel' uses and an elevated public plaza, nomination of three (3) signage zones with ancillary landscaping and solar photovoltaic panels (roof mounted) and associated alterations to basement and public plaza at Festival Plaza, Adelaide (the 'subject site'), refer to **Figure 2-1** over-page.

This planning statement provides information about the subject site and proposed development. The planning statement will address the merits of the development application, as assessed against the relevant provisions of the Planning and Design Code (Version 2025.5 – dated 13 March 2025).

For the purposes of this statement, the Planning, Development and Infrastructure Act, 2016 will be referred to as the 'PDI Act', the Planning, Development and Infrastructure (General) Regulations, 2017 will be referred to as the 'PDI Regulations' and the Planning and Design Code will be referred to as the 'Code'.

Importantly, this Planning Statement has been informed by an inspection of the site and its immediate locality and been prepared on the basis of the attached plans, elevations and supporting documentation as summarised below:

Appendix	Documentation	Consultant
Appendix 1	Certificate of Title	
Appendix 2	Architectural Plans	JPW
Appendix 3	Design Statement	JPW
Appendix 4	Public Realm & Landscape Plan	Aspect Studios & Mantirri Design
Appendix 5	Heritage Impact Statement	Hosking Willis Architecture
Appendix 6	Sustainability Strategy Report	Dsquared
Appendix 7	Wind Impact Assessment	MEL Consultants
Appendix 8	Aviation Assessment	Thompson GCS
Appendix 9	Waste Management Plan	Rawtec
Appendix 10	Loading & Car Parking Assessment	WGA
Appendix 11	Stormwater Management Plan	Mott MacDonald

Based on our assessment of the proposed development, in conjunction with the considerable level of supported technical reports and advice, we have formed the opinion that the proposed development satisfies the relevant provisions under the Planning and Design Code, and therefore warrants the granting of Planning Consent.



Figure 2-1 Tower 2 Render (Source: JPW)

2.1. Previous Approvals & Project Background

2.1.1. Festival Tower

On 10 November 2016, Development Plan Consent was issued for demolition works and construction of a car park over five (5) basement levels, a 27 level office tower and three (3) storey retail pavilion building at Festival Plaza.

Since obtaining Development Plan Consent, various variation applications for Festival Tower were submitted and obtained Development Approval to accommodate two (2) additional building levels, a change in land use to educational establishment (Flinders University), ground level facades and more.

Similarly, various Variation applications have received Development Approval to undertake alterations within the basement to the car park layout, refining plant rooms and the central core and amendments to Festival Drive entrance. The current approved basement layout (level 01) relevant to the proposed Tower 2 is referenced below in **Figure 2-2**.

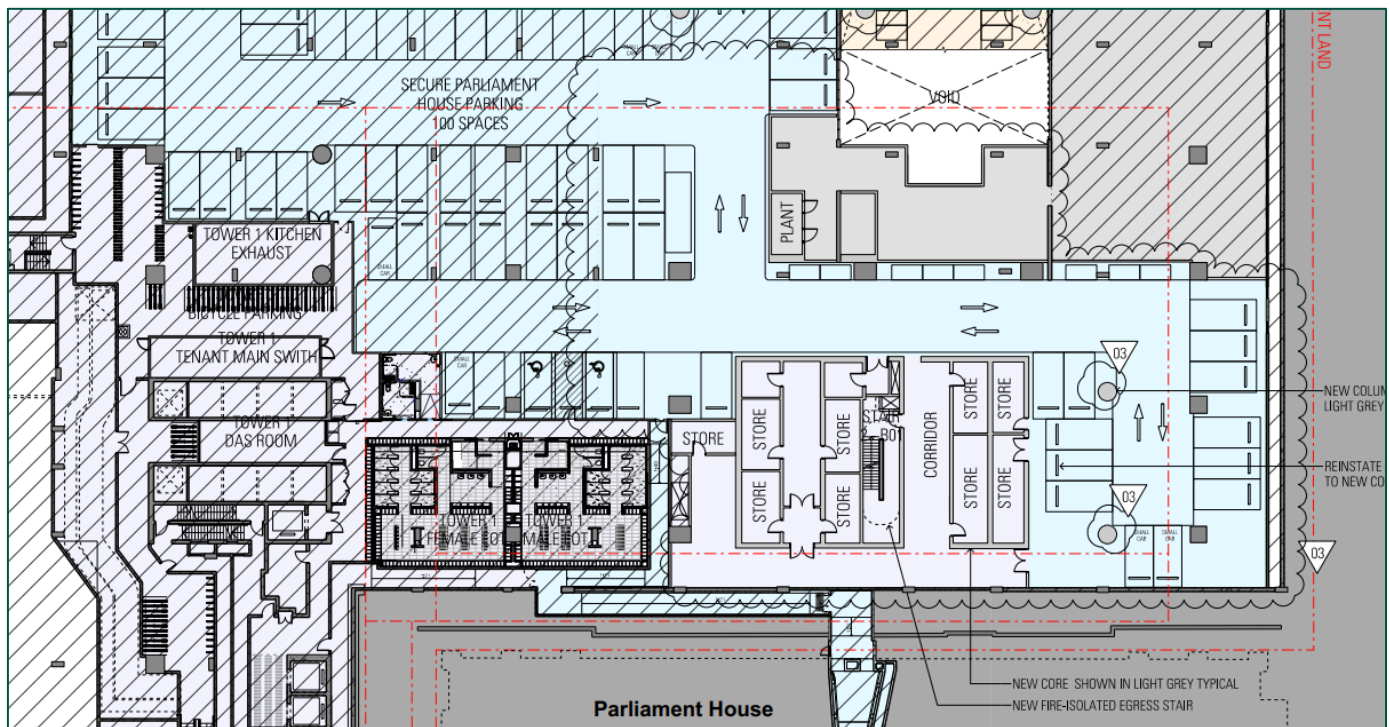


Figure 2-2 Approved Basement Layout – Application ID 24010215 (Source: JPW)

The applicant has completed construction of the basement and recently completed Festival Tower in 2024. Photos of Festival Tower are included below in **Figure 2-3**.







Figure 2-3 Festival Tower Photographs

The applicant is yet to carry out works involving the retail pavilion building and proposes to instead replace the retail pavilion building with the new 38 storey tower. The previous approved ground floor plan for the retail pavilion and elevations/renders are referenced below in **Figure 2-4, Figure 2-5 & Figure 2-6**.

The approved retail pavilion building was designed to be three (3) storeys high, have a building frontage width of approx. 56m and depth of approx. 31m. The retail pavilion building was approved to accommodate shops, restaurants and café uses.

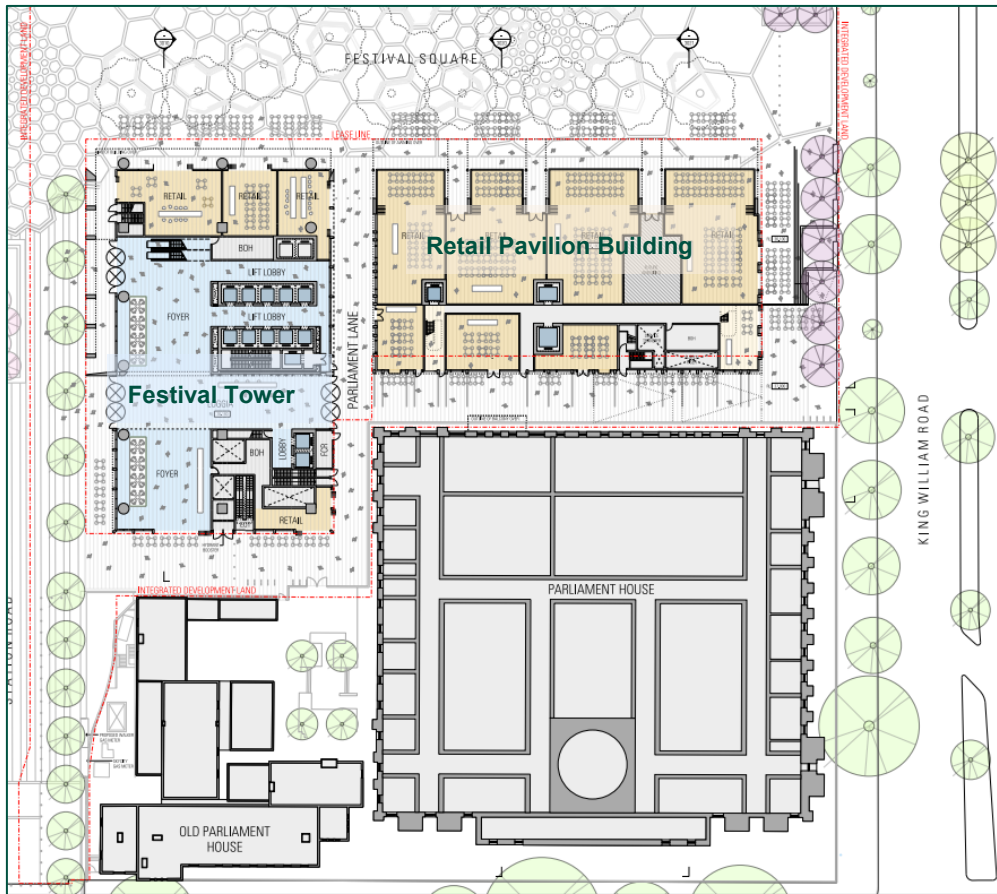


Figure 2-4 Current Approved Festival Tower & Retail Pavilion Building Ground Floor (Source: JPW)

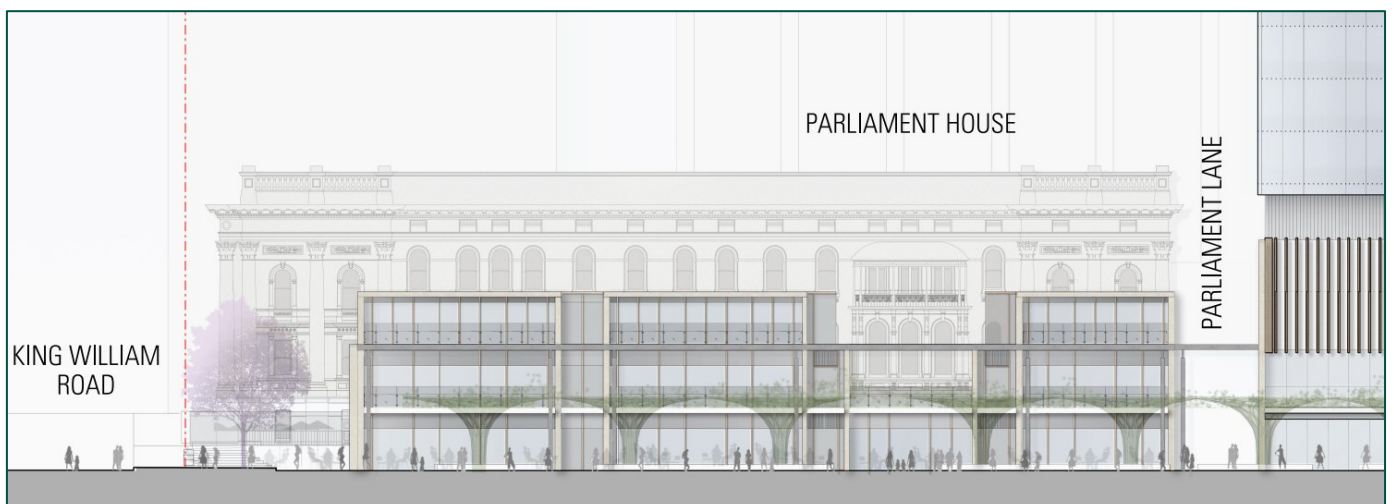


Figure 2-5 Current Approved Retail Pavilion Building Southern Elevation (Source: JPW)



Figure 2-6 Current Approved Retail Pavilion Building Renders (Source: JPW)

2.1.2. Festival Plaza

Crown Application 020/V091/15, which proposed the installation and extension of a new public plaza and other associated works across the land known as Adelaide Festival Plaza, was approved by the Minister for Planning on 4 May 2016.

Works associated with this application are close to completion. The bulk of the redesigned Plaza was undertaken a few years ago in conjunction with the adjacent Sky City project and the subterranean Festival Square carpark. Remaining elements to be completed include the space between Festival Theatre and Dunstan Playhouse (known as the Western Stair), Parliament Lane and the remaining arbours and public realm edge around the now proposed Tower 2 building.

Since 2016, a number of plaza design refinements have been explored and multiple variations submitted to respond to latent factors and changing design elements.

In order to ensure a fully integrated outcome of the spaces in and around Tower 2, RSA and DIT agreed that the final design of this public realm edge, including Parliament Lane, should be included in the 'development site area' of the Tower 2 development application. This way both the design and any final planning conditions can be managed via a single application, improving communication, coordination and efficiency.

2.1.3. Pre-lodgement Process and Engagement

The applicant and project team has undertaken comprehensive consultation with relevant stakeholders for this project.

Three (3) Pre-lodgement Panel Meetings were undertaken with PLUS administration and stakeholders including ODASA, Heritage SA, Adelaide Airport Limited and City of Adelaide.

Three (3) Design Review Panel sessions were undertaken with ODASA. Members of the original Design Review Panel sessions for Festival Tower and the retail pavilion building development application were re-appointed for consistency, given their familiarity with the site.

Separate pre-lodgement meetings with relevant stakeholders including Heritage SA were undertaken as part of the pre-lodgement process.

The applicant and project team undertook on-going liaison with Renewal SA and relevant stakeholders regarding the relationship with the built form of Festival Plaza.

3. SITE & LOCALITY

3.1. Subject Site

The subject site is located at Festival Plaza which is land comprised between the Adelaide Festival Centre, Parliament House, Old Parliament House, Adelaide Casino (Skycity) and the Adelaide Railway Station.

Development is not proposed across the entire subject site, as majority of works at Festival Plaza have been previously constructed including the public realm works constructed by DIT and Walker and Festival Tower constructed by Walker. Notwithstanding, the 'subject site' references these areas as the land is collectively under the care, control and management of Government Agencies with relevant leasing agreements. Further and of most importance is to ensure that the proposed tower is designed to integrate with these existing features in a seamless manner and that together, the buildings, plaza and public realm spaces ultimately deliver a cohesive, appealing and legible destination within the City of Adelaide.

The proposed development will involve a combination of above and below ground works.

The above ground works are contained within Lot 602 King William Road, Adelaide (formally described as Certificate of Title Volume 6277 Folio 532 – Deposited Plan 128908 Allotment 602). This area of the subject site will be referred to as the '**development site**' throughout the report. The development site will accommodate the majority of the proposed works.

The balance of works are located below ground within the existing basement car park.

A plan that identifies the scope of the 'subject site', 'development site' and the 'basement car park extent' has been prepared - refer **Figure 3-1** below. Photographs of the subject site and development site are included within **Figure 3-2**.

For clarity we have nominated the 'basement parking extent', as workers and service / refuse vehicles associated with Tower 2 operations will utilise the existing basement car park. Notwithstanding, majority of the proposed works within the basement are located immediately below the development site, except for some of the end of trip facilities on Level B1.

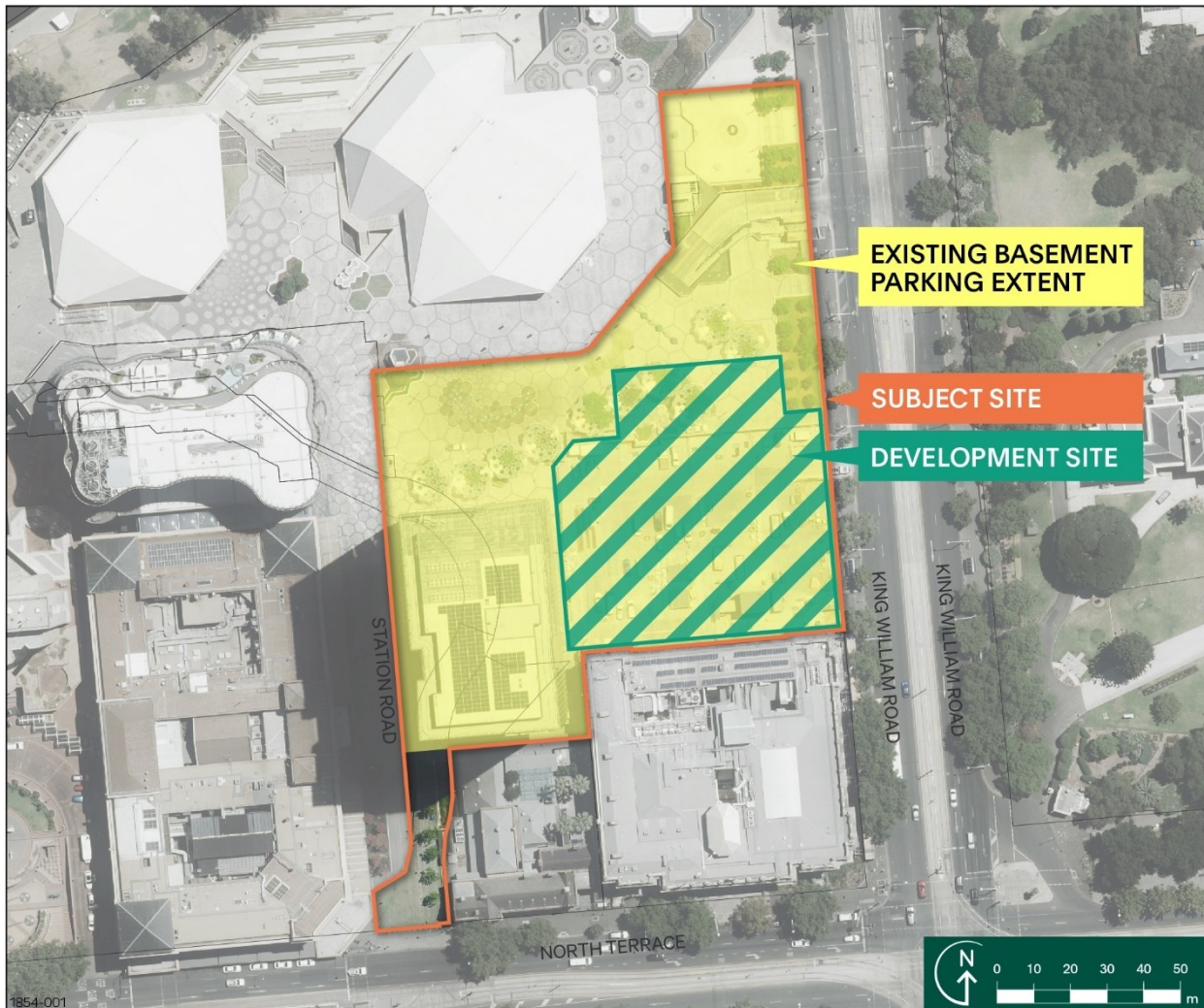


Figure 3-1 Subject site, development site and basement car park extent



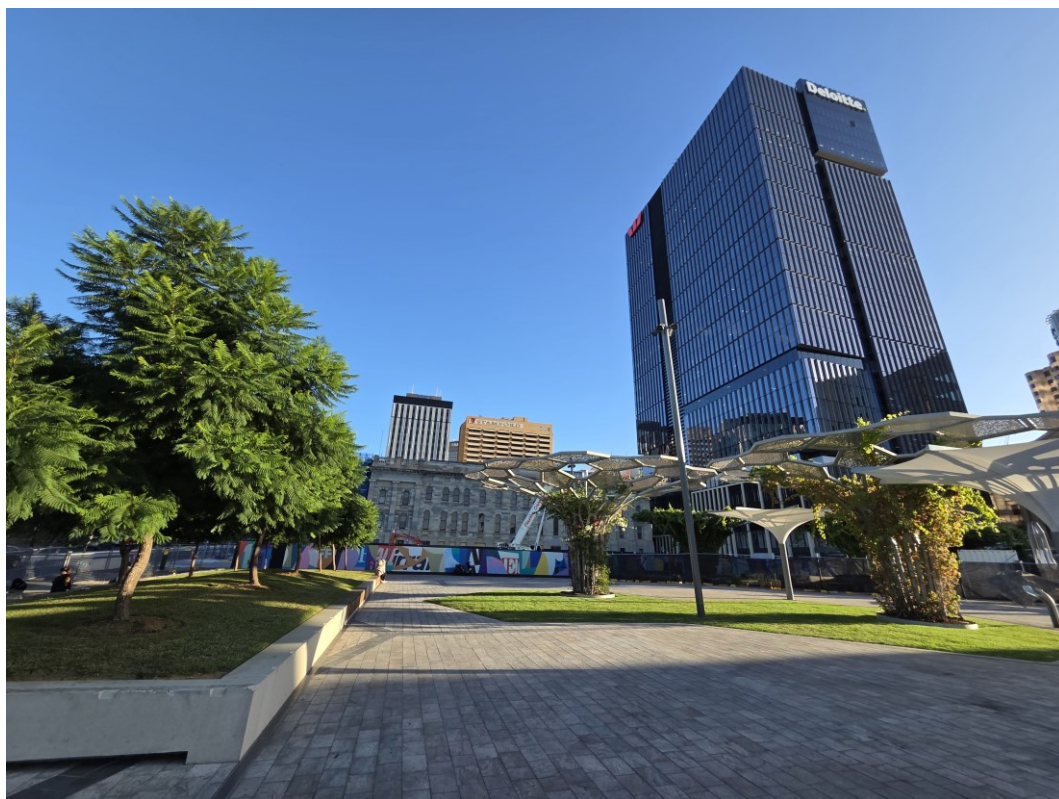


Figure 3-2 Subject site photographs

3.2. Locality

The subject site is located within the 'Riverbank Precinct' which is one of South Australia's most important and significant public places in terms of its social, economic and cultural value to the State.

The site also forms part of the Festival Plaza which is designed to be an accessible, high-quality public realm space, incorporating a newly designed Plaza and promenade bounded by North Terrace, Old Parliament House, New Parliament House, King William Road, Elder Park, The Adelaide Casino (Sky City) and Adelaide Railway Station. The Plaza and promenade are designed to integrate and link with the waterfront along the River Torrens.

To the north and north-west of the subject site is the Adelaide Festival Centre and Dunstan Playhouse respectively. The Adelaide Festival Centre (including the Festival Theatre, Dunstan Playhouse, Space and Amphitheatre, Restaurant and Convention Facilities) is a State Heritage Place (ID 1370).

Elder Park is located further north within the Adelaide Parklands and is defined by the River Torrens. To the north of the River Torrens is Adelaide Oval which is utilised for Cricket, Australian Rules Football, major sporting events and entertainment with a seating capacity of approximately 50,000 people. Adelaide Oval is accessible from the subject site via the Riverbank pedestrian footbridge.

To the south of the site is Old Parliament House and Parliament House which are both State Heritage Places (ID10874 and ID 10845 respectively) with frontages to North Terrace.

To the west of the site is the Adelaide Railway Station and Adelaide Casino which is also a State Heritage Place (ID10844). The Sky City Casino hotel incorporates a wellness centre, restaurants and bars located to the immediate west of the site.

To the east of the site, over King William Road, is Government House which is a State Heritage Place (ID10873).

Photographs of the locality and key landmarks are referenced in **Figure 3-3** and **Figure 3-4**.

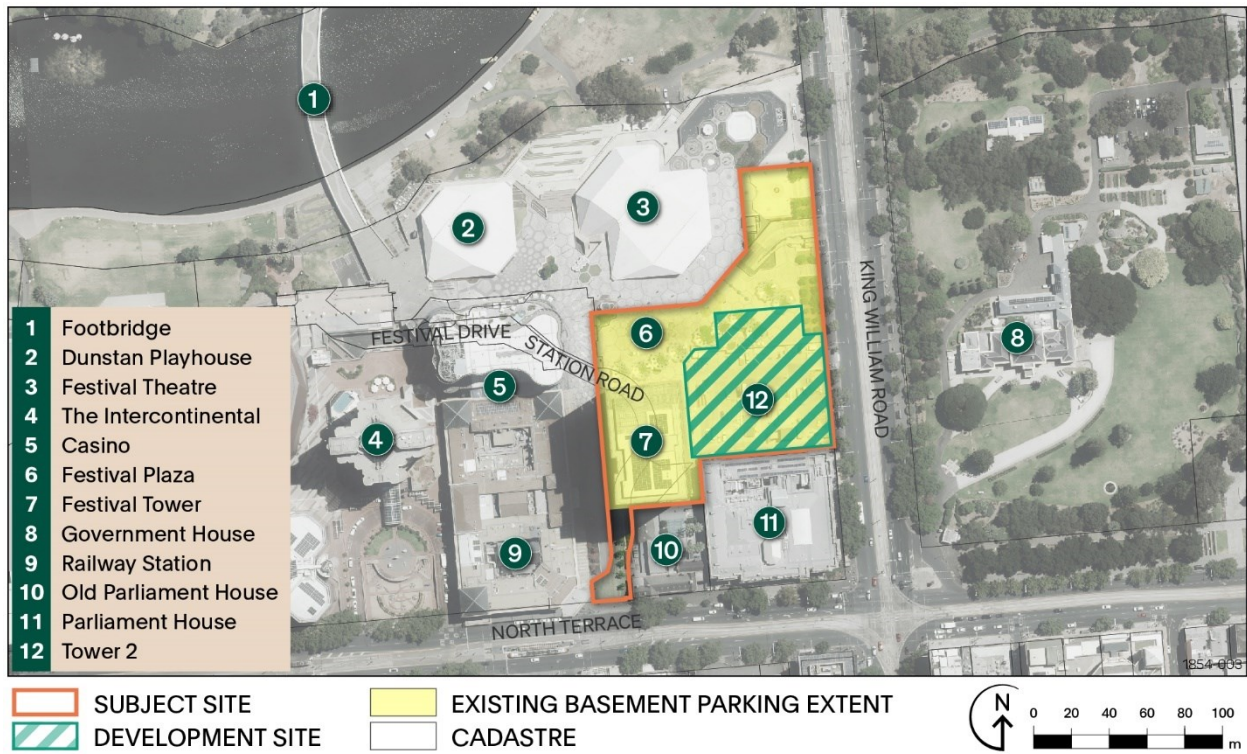


Figure 3-3 Surroundings to Festival Plaza





Figure 3-4 Locality photographs

4. PROPOSED DEVELOPMENT

The proposed development is discussed under relevant sub-headings below, and has been summarised as follows:

- Construction of a 38 level commercial tower with four (4) proposed land uses: 'office', 'shop' (including 'café' and 'restaurant'), 'civic space and office' and 'hotel' (licensed premises).
- Public realm upgrades with the construction of an elevated public plaza integrated with the tower design and amendments to Festival Plaza at the northern and eastern interface of the tower, a revised design to Parliament Lane, public toilets and various landscaping.
- Amendments within the basement relate to upgrading previously approved core structures for lifts to accommodate the proposed tower, inclusion of end of trip facilities (incl 243 bicycle parking spaces) and minor alterations to car park layout (comprising a total of approximately 1,350 car parking spaces).

4.1. Tower Design

The proposed 38 level tower achieves a maximum building height of 160.77m. The proposed land uses of each level of the tower are summarised below in **Table 4-1**:

Table 4-1 Tower Composition

Level(s)	Proposed Land Use
Ground Level to Level 01	Building Foyer, 'Shop/s' (including 'restaurant' & 'café'), elevated public plaza, and public realm
Levels 02 to 05	'Civic Spaces and Offices' (& plant room included on Level 04)
Levels 06 to 16	'Offices'
Levels 17 to 18	Mid rise plant room
Levels 19 to 34	'Offices'
Level 36	Rooftop 'restaurant' and 'hotel' (licensed premises) accessed via Level 35
Level 37	Rooftop plant

Overall, the composition of land uses within the tower can be broken down as follows:

- Approx. 800m² of gross leasable floor area ('GLFA') to 'shop' uses (including a combination of restaurants, cafes and shops) at ground level and level 01;
- Approx. 50,000m² of GLFA to a combination of 'civic space and office' and commercial 'offices' between levels 2-16 and 19-35; and
- Approx. 750m² of GLFA of roof top restaurant and hotel (licensed premises) located at level 36.

The 'shop' uses will likely form a combination of 'shops', 'cafés' and 'restaurants' and will be selected to assist with activating the ground level and level 01 (refer to **Figure 4-1**). The applicant's intention is to include a variety of 'shops' to cater for the needs of all workers and visitors within this precinct, including quick take-away meals, casual sit down dining and the option for more formal sit down dining.

The proposal includes a roof-top style restaurant and/or bar at level 36, providing the opportunity for patrons to benefit from the eastern and northern views of Adelaide CBD and the Adelaide Hills.

The 'office' floorplates have generally been designed to accommodate one (1) tenancy per floor or multiple floors per tenancy. JPW have prepared indicative floor plates for the 'office' uses to demonstrate how each level may function, refer to **Figure 4-2**.

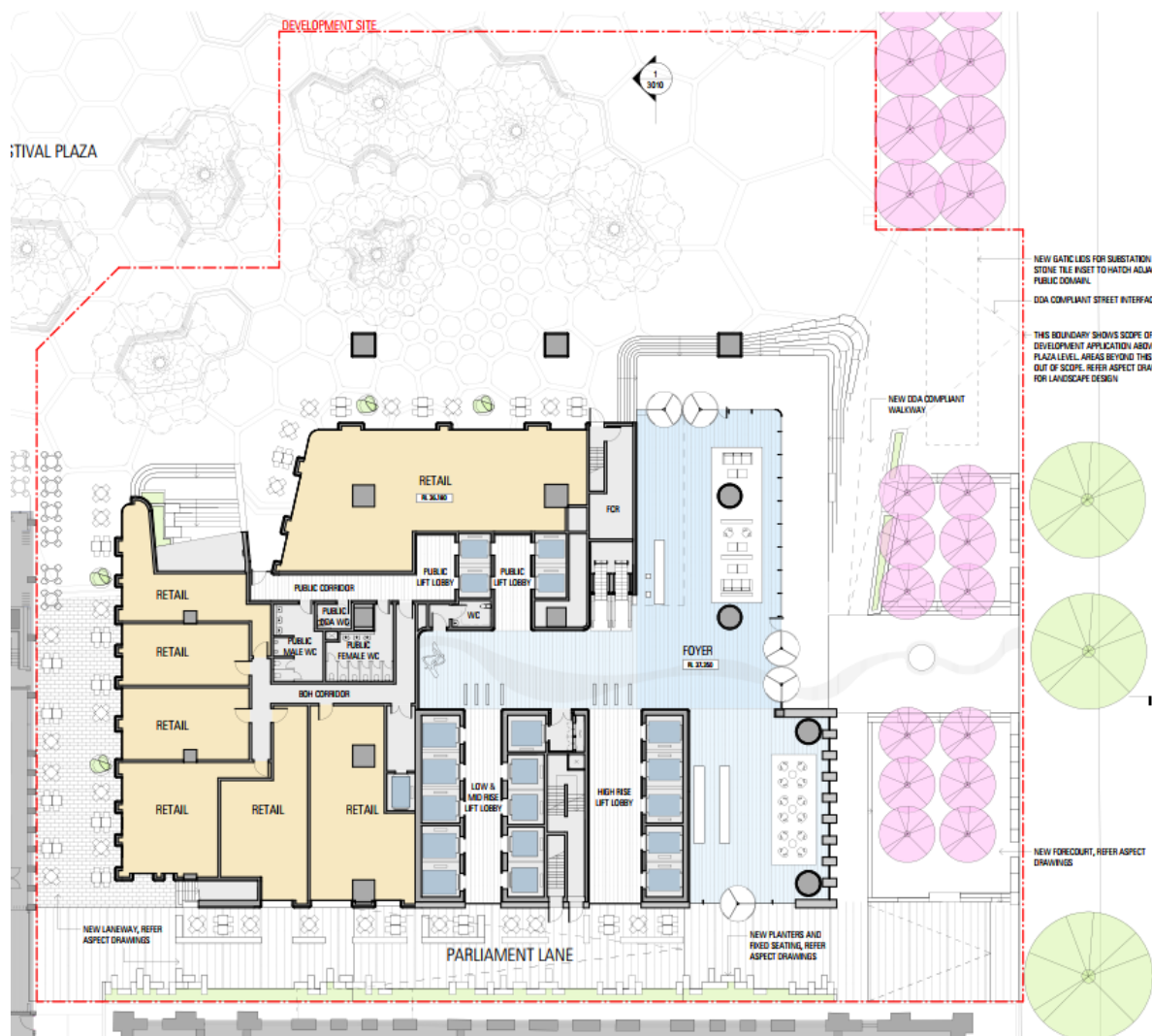


Figure 4-1 Ground Floor Plan (Source: JPW)



Figure 4-2 Indicative floor plates for 'office' uses (Source: JPW)

The main foyer has three (3) entrances. The King William Road and Parliament Lane entrances are designed to be at-grade whilst the northern entry point includes a small set of stairs. The main foyer provides access to the offices, civic space and offices and rooftop restaurant and bars accessed via the lift lobbies.

The 'civic space and office' use has a separate escalator leading upstairs within the lobby and additional lift lobby accessed via Festival Plaza and the elevated public plaza. The final operations for the civic office use are still being determined but are expected to include a combination of traditional civic space that can be used for community events/functions, displays and/or awards, whilst also providing office space for the relevant Government Agency managing the civic space.

Solar panels are proposed on the roof of the building, with the final number and design set to be determined at the detailed design stage of the project.

Three (3) signage zones are proposed to the northern, western and southern façades located at the top of building. Signage will be designed once tenants are locked and a subsequent Section 128 variation application will be submitted.

Rendered images of the tower capturing the northern and southern façades are referenced in **Figure 4-3**.



Figure 4-3 Rendered Images (Source: JPW)

4.2. Elevated Public Plaza & Public Realm Works

The proposed elevated public plaza and public realm works are a key component to achieving a high quality design at this site and have led to informing the design of the tower's lower levels.

The elevated public plaza concept has undergone several design iterations. The first concept presented at Design Review Panel session #1 proposed an at-grade plaza space between the two towers, essentially an extension of the Festival Plaza. In response to design feedback from the Government Architect, as well as engagement with ARM Architecture ('ARM') and Mantirri Design Landscape Architects (cultural heritage design advisor) the space between the two towers evolved to a raised feature and now presents as an elevated public Plaza.

ARM are the Architects for the redesign of Festival Plaza. They were engaged by the Government to inform the Festival Plaza Code Amendment and prepared a 'Festival Plaza Urban Design Review' as part of the investigations. ARM recommended further exploration of multi-level public spaces with distinct character. ARM recommended an elevated public plaza design to 'bridge the gap' and provide spatial definition to the public realm. ARM considered an elevated public plaza and resulting enclosure would improve the sense of security and safety, with the overlooking of buildings and the elevated public plaza providing passive surveillance. In addition to these design features, the elevated public plaza provides improved visibility to the northern façade of Parliament House and Parliament Balcony.

As the project progressed JPW, Aspect Studio and the applicant engaged with Mantirri Design to further understand the cultural history and storytelling of the site, through walking country with Uncle Mickey Kumatpi Marrutya O'Brien. Mantirri Design, JPW and Aspect Studio have prepared a visual explanations to advise how designing with country has informed the project (refer to **Figure 4-4**).

Tarntanya (translated to 'Red Kangaroo Place') represents the Adelaide area and is importantly located along Karrawirra Parri ('Redgum Forest River', the River Torrens). Tarntanya relies on the supply and connection of water from Mukurta ('Hill/Mountain', the Mount Lofty Ranges) down to Wonggayerlo ('Western Sea', the Gulf St Vincent).

Karrawirra Parri provided several waterholes that communities would use and camp nearby.

Kaurna people would meet within the vicinity of the project site, which is known as Tarnda Kanya (Red Kangaroo Rock), a large rocky outcrop on the southern bank of the river, where the Adelaide Festival Centre now sits. Tarnda Kanya was a natural escarpment south of Karrawirra Parri, and has changed over the years as a result of it being quarried in the early days of colonisation for the sandy to white coloured limestone rock.

Storytelling of the site informed Aspect Studio, Mantirri Design and JPW that prior to light pollution, on a clear night the Wodlipari ('Home River' – the Milky Way) would be reflected in the Karrawirra Pari, further signifying the importance of the river, and this has been reflected in the landscape design.

JPW prepared a section (looking east) of the site and broader locality (North Terrace to Adelaide Bridge) to further understand the existing levels and how the proposed elevated public plaza complements the escarpment of the Riverbank precinct (refer to **Figure 4-5**).

As identified by ARM, the introduction of an elevated public plaza has assisted with defining Festival Plaza's primary public realm space and Tower 2's public space whilst still providing an integral linkage between the two spaces via the public Grand Stairs. Additionally, the elevated public plaza creates a unique laneway opportunity between the Towers and Parliament House and provides opportunities for retail tenancies to front the laneways, complemented by outdoor dining and public seating infrastructure.

The public realm elements relevant to the proposal and Festival Plaza can be broken up into the following four (4) elements and are identified in **Figure 4-6**:

- Festival Plaza;
- The elevated public plaza and public Grand Stairs connecting to Festival Plaza;
- King William Road forecourt; and
- The laneways.

The proposed works relevant to each public realm element are described below under relevant sub-headings.

The public realm interface is designed to ensure that the levels surrounding the perimeter of the tower will result in an at grade design, apart from the Public Grand Stairs to the elevated public plaza and at the north-eastern corner of the tower leading into the foyer.

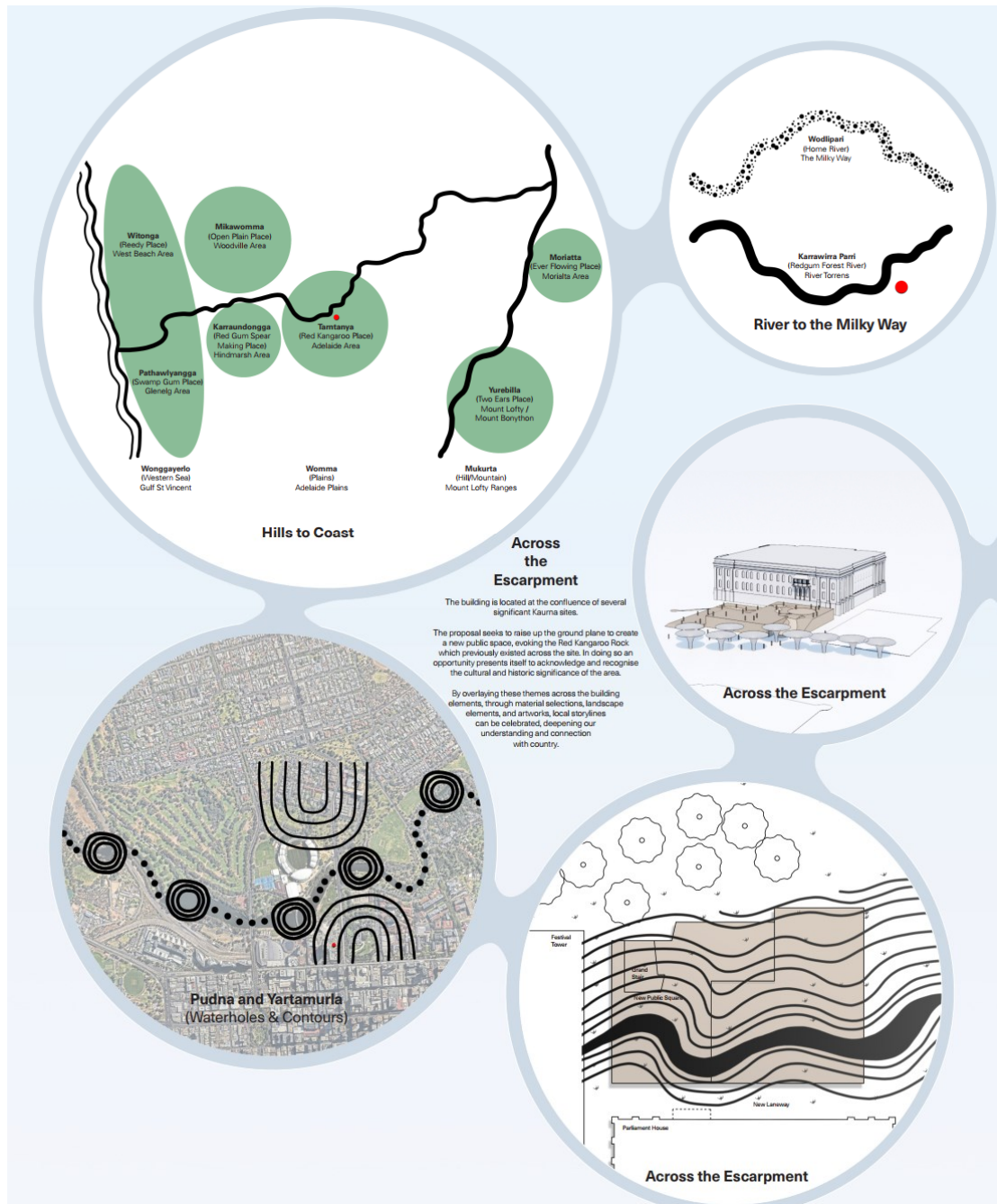


Figure 4-4 Tarntanya cultural significance (Source: JPW, Mantirri Design & Aspect Studio)



Figure 4-5 Riverbank precinct topography (Source: JPW)

Five distinct places surrounding Tower 2 will complete the public realm vision articulated in the Adelaide Festival Plaza Precinct Master Plan.

The Forecourt - a new precinct entrance along King William Road that reinforces the active edge of the plaza

Festival Plaza - stitching the Tower into the Festival Precinct

The Elevated Plaza - an elevated new public space within a garden setting that overlooks Festival Plaza

Grand Stairs - with cascading planters and terraced seating, connecting Parliament Court to the Plaza

The Lanes - new north-south and east-west laneways with active shop frontages.

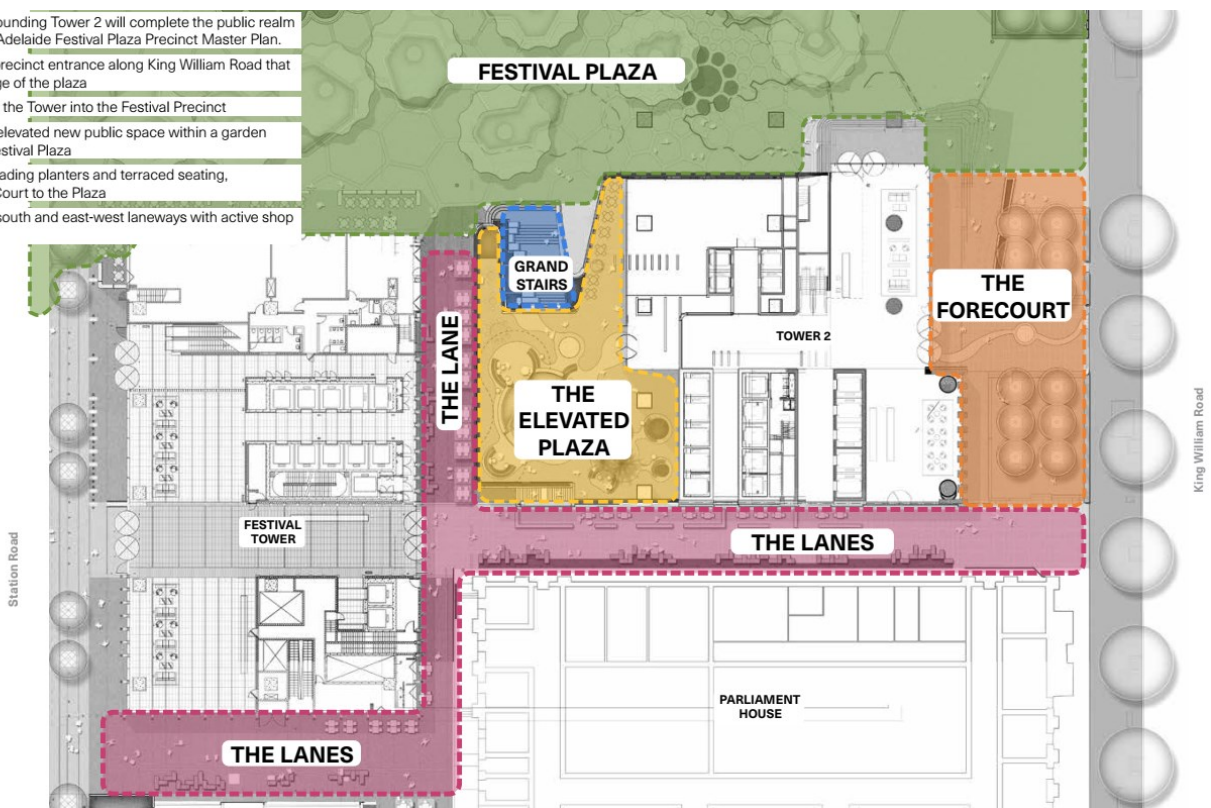


Figure 4-6 Public realm elements (Source: Aspect Studio & Mantirri Design)

4.2.1. Festival Plaza

To accommodate the proposed development, Festival Plaza will require amendments, relocation and removal of arbours and planters (a combination of existing and yet to be constructed). Aspect Studio and Mantirri Design has worked closely with ARM, RSA and DIT regarding amending Festival Plaza's harbour layout.

Aspect Studio and Mantirri Design has prepared a plan identifying the proposed changes to the harbour layout and design, in **Figure 4-7**. Ultimately, the proposal will result in the removal of four (4) approved arbours (annotated as red and blue in the plan below) that are located beneath the northern projection of the building. These four (4) arbours are yet to be constructed. Three (3) existing arbours are proposed to be relocated (identified as green and purple in the plan below) to improve the layout of the public

realm and interface with the siting of Tower 2. All paving and materials associated with the harbour and Festival Plaza public realm amendments will match existing (approved) materials currently constructed within the plaza.

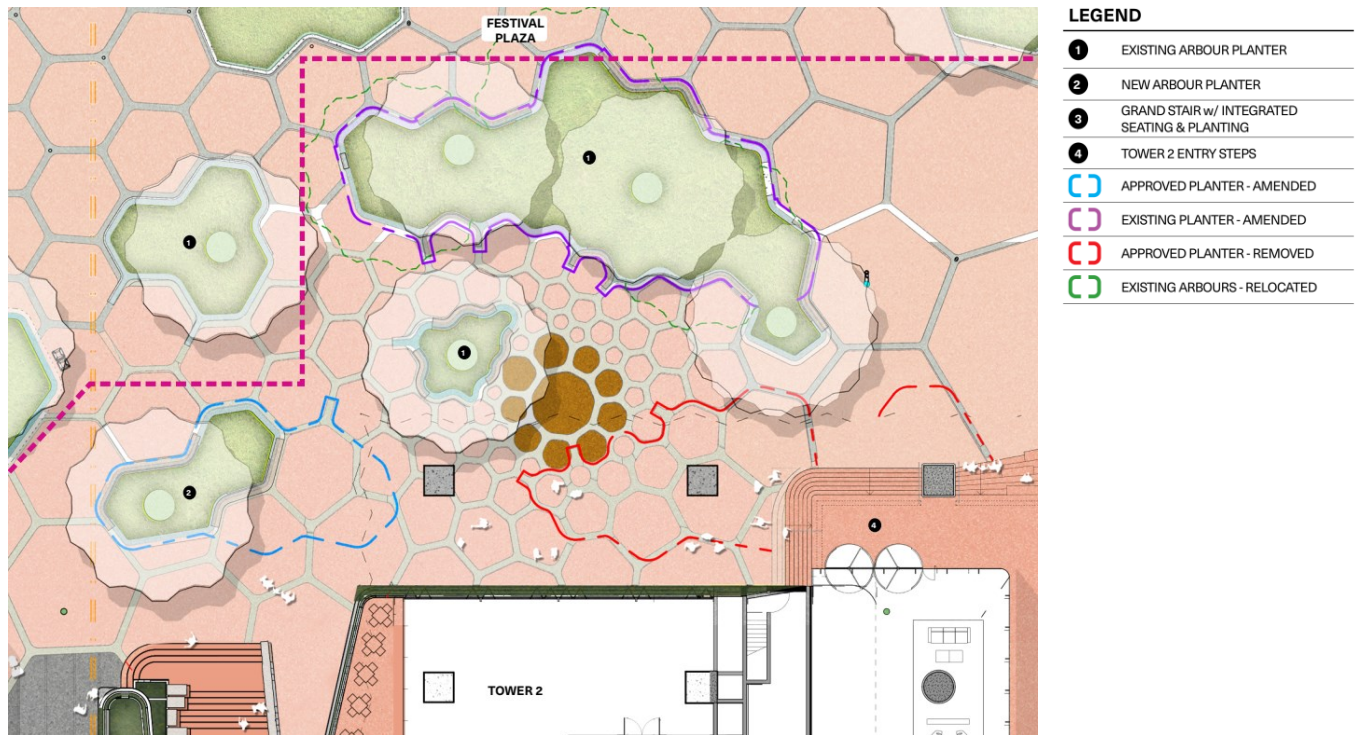


Figure 4-7 Arbour layout (Source: Aspect Studio & Mantirri Design)

4.2.2. Elevated Public Plaza & Stairs

The proposed elevated public plaza has been designed to be accessible and used as public open space, extending on from Festival Plaza. The elevated public plaza is universally accessed via the public Grand Stairs that connects to Festival Plaza, a secondary staircase to the rear of the building access via Parliament Lane and visitors can also use the public lift lobby accessed from Festival Plaza. Abutting this public lift are proposed public toilets that will be open in line with the shop tenancies or for special events..

The elevated public plaza has been designed to include:

- A space that will be accessible by the general public at all times and function as an extension to the existing Festival Plaza public realm.
- Public informal seating opportunities throughout the elevated public plaza and on the public Grand Stairs.
- A dedicated lawn and deck platform for visitors to congregate and use. The deck platform includes a DDA access ramp providing access for all visitors.

- The elevated public plaza features two (2) primary garden beds that will accommodate indicative tree species that include Large-fruited Yellow Gum and Cabbage-tree palm trees. Various shrubs and ground covers are proposed and nominated in the Landscape Report. Garden beds are located along the public Grand Stairs and integrated with the seating provided.
- Opportunities for outdoor dining associated with the 'shop' tenancy at Level 01 that will assist with activating the site throughout the day and night.
- The elevated public plaza design includes reflective Kaurna themed public artwork. One of the artworks will be a feature piece located at the top of the public Grand Stairs (and could be a sculpture or similar), however it will require further consultation with a suitable artist to design this piece of work. The paving of the elevated public plaza includes a pattern representing the Karrawirra Parri that flows through the lobbies of the building (ground level and level 01) and connects to King William Road and the forecourt.
- The balance of the paving across the elevated public plaza and stairs will consist of a 'light paving' option.

An indicative layout of the elevated public plaza is referenced below in **Figure 4-8** and an artist's impression when viewed from the laneway in **Figure 4-9**.

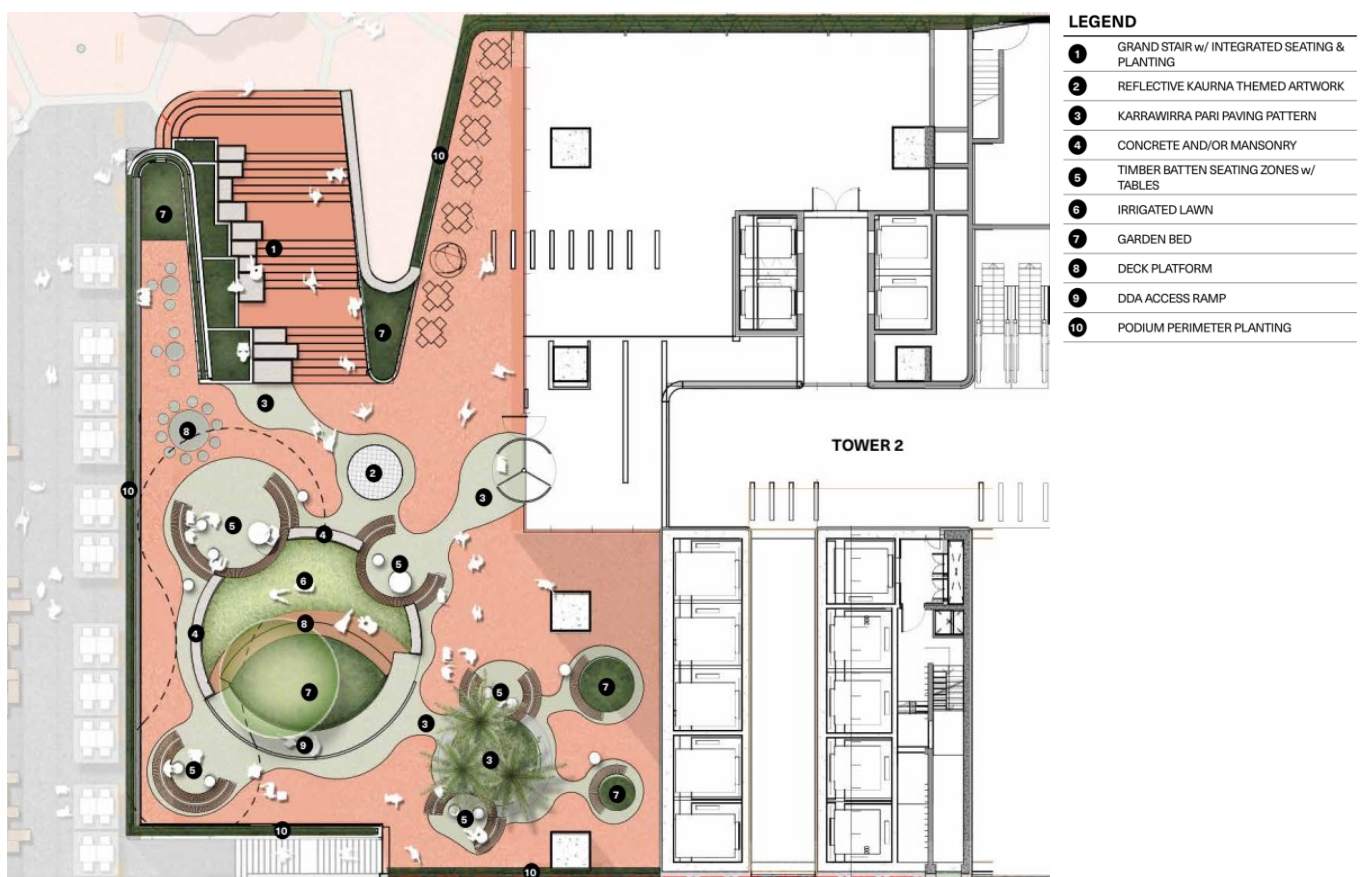


Figure 4-8 Elevated public plaza layout (Source: Aspect Studio & Mantirri Design)



Figure 4-9 Artist impression of the elevated public plaza and laneways (Source: Aspect & Mantirri Design)

4.2.3. King William Road Forecourt

A previous Variation Application for the retail pavilion building reduced the number of Jacaranda trees to a single row of six (6) at the King William Road frontage. The proposal restores the King William Road Jacaranda tree avenue with an additional six (6) trees (two rows) to align with the existing landscaping treatment along King William Road. Garden beds are dispersed throughout the forecourt and along the stairs to soften the hard stand surfacing.

Surrounding the building is a combination of stairs, a DDA access ramp and at-grade access with King William Road.

As discussed, with the elevated public plaza, the paved pattern of the Karrawirra Parri will continue through the forecourt and directly connect to King William Road. Similarly, the forecourt proposes a feature reflective Kaurna themed public artwork at the King William Road entrance (and could be a sculpture or similar), however it will require further consultation with a suitable artist to design this piece of work.

Sandstone block wall and seating are proposed at the King William Road frontage.

An artist impression of the King William Road forecourt has been prepared by Aspect Studio and referenced below **Figure 4-10**.



Figure 4-10 Artist impression of King William Road forecourt (Source: Aspect Studios)

4.2.4. The Laneways

The proposal will result in creation of laneways between the Towers and Parliament House, which has previously been referred to as Parliament Lane across various projects.

The laneways provide opportunities for outdoor dining associated with the shop tenancies and public seating for workers and visitors, that will activate these spaces and encourage pedestrian movements throughout. Parliament Lane south of the building has a generous amount of space to accommodate these public realm features.

The laneway designs are conceptual at this time and will be further developed once the tenants are secured and further consultation is undertaken regarding the interface with Parliament House to ensure security requirements are met.

4.3. Basement & Servicing

Majority of previously approved basement works have been constructed to date. Subsequent variations to the basement have obtained Development Approval over time and these variations are currently being constructed on site, with the key element being the core structure to this development site.

The proposed works within the basement include:

- Conversion of approved core structure to facilitate access (via lifts) to Tower 2.
- Inclusion of end of trip facilities to Level 1 of basement for Tower 2 workers that are accessible via the existing Festival Drive staircase. The facilities will provide 243 bicycle parking spaces, along with ancillary gym equipment for workers to use.
- Alterations to layout of car park to accommodate the end of trip facilities and relocation of plant room, the basement will retain approximately 1,350 car parking spaces on site.

5. PROCEDURAL CONSIDERATIONS

5.1. Applicable Policies

The Planning and Design Code (Version 2025.5 – dated 13 March 2025), in conjunction with the SA Property and Planning Atlas (SAPPA), identifies that the site is situated within the **City Riverbank Zone** and **Entertainment Subzone**.

The following **Overlays** apply to the site:

- Airport Building Heights (Regulated) (All structures over 90 metres AHD) / (All structures over 100 metres AHD) / (All structures over 110 metres AHD)
- Building Near Airfields
- Design
- Heritage Adjacency
- Hazards (Flooding - Evidence Required)
- Noise and Air Emissions
- ~~Prescribed Wells Area~~
- ~~Regulated and Significant Tree~~
- State Heritage Place (1370 – Adelaide Festival Centre)
- State Heritage Place (1639 – Adelaide Railway Station)
- State Heritage Place (1641 – Parliament House)

The above Overlays that have a strikethrough are applied to the site but are not relevant to the assessment as the proposal does not include land uses reliant on water supplies, and the site does not include regulated or significant trees in close proximity to the development site.

Local Variation (TNV) ‘Concept Plan (Concept Plan 153 – City Riverbank – Festival Plaza)’ applies to the site providing guidance to assist with the built form design and maintaining key principles of the Festival Plaza (refer to **Figure 5-1**).

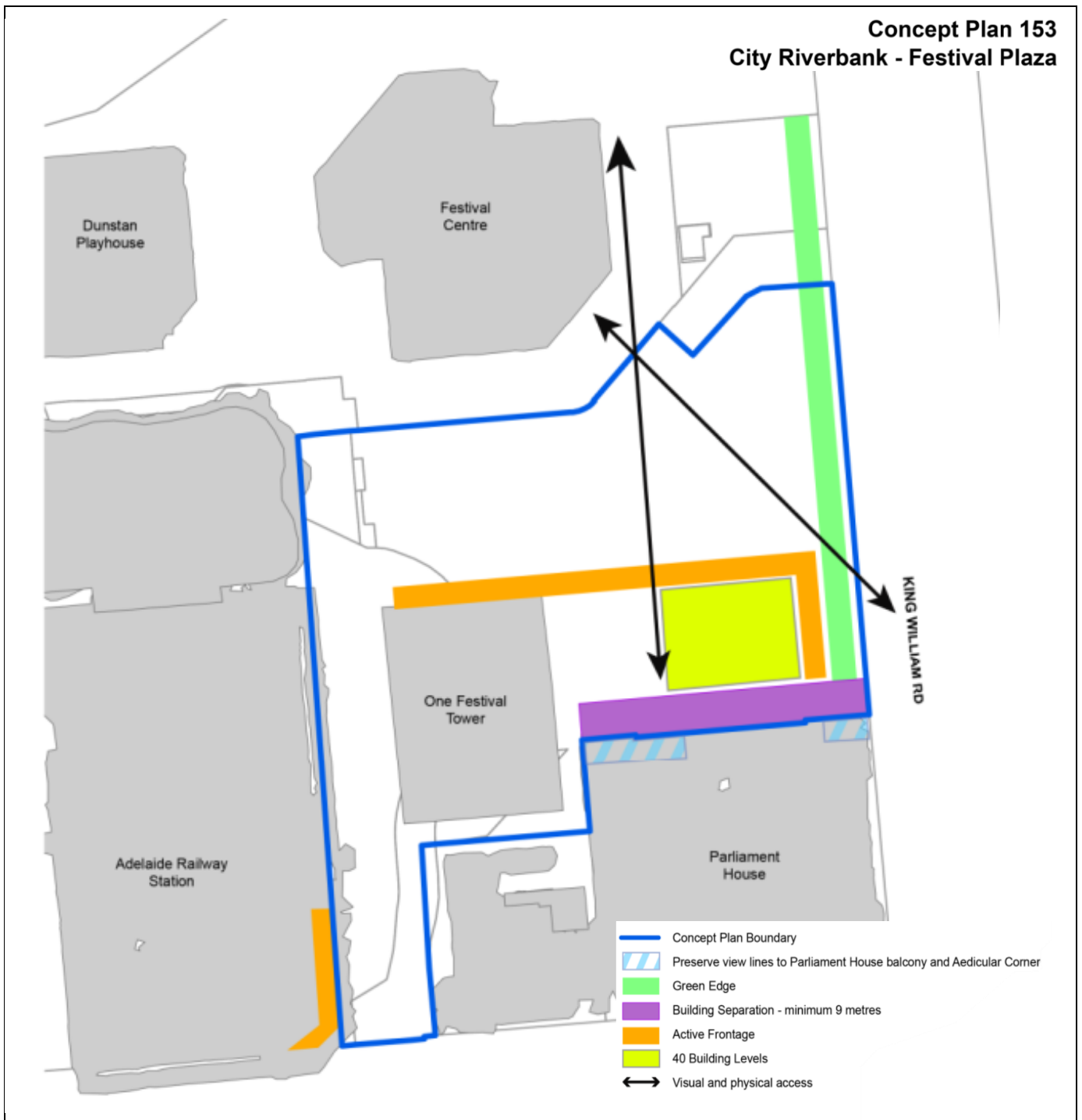


Figure 5-1 Concept Plan 153 (Source: Planning and Design Code)

5.2. Nature of Development

It is considered that the proposal is best described as:

“Construction of a 38 storey mixed use building comprising ‘office’, ‘shop’, ‘civic space and office’, ‘hotel’ uses and an elevated public plaza, nomination of three (3) signage zones with ancillary landscaping and solar photovoltaic panels (roof mounted) and associated alterations to basement and public plaza”

The proposed development consists of the following elements:

- ‘Shop’ (including ‘café’ and ‘restaurant’);
- ‘Office’;
- ‘Civic space and office’;
- ‘Hotel’ (licensed premises);
- ‘Advertising display’;
- ‘Public realm’; and
- ‘Solar photovoltaic panels (roof mounted)’.

5.3. Classification of Development

‘Office’, ‘shop’ and ‘advertisement’ are classified as ‘Code Assessed – Performance Assessed’ forms of development within Table 3 (Performance Assessed Development) of the City Riverbank Zone.

‘Civic space and office’, ‘public realm’, ‘hotel’ and ‘solar photovoltaic panels (roof mounted)’ are neither classified as ‘Accepted’, ‘Deemed-to-Satisfy’ nor ‘Restricted’ forms of development and therefore default to ‘Code Assessed – Performance Assessed’ forms of development.

5.4. Relevant Authority

The relevant authority to determine the development application will be **State Planning Commission** delegated to the **State Commission Assessment Panel (SCAP)**, pursuant to Schedule 6, clause 3(1) of the *Planning, Development and Infrastructure (General) Regulations, 2017* as the total development costs (when all stages of the development are complete) exceeds \$10M.

5.5. Notification

The proposed development does not include the demolition (or partial demolition) of a State or Local Heritage Place and is not adjacent to land used for residential purposes in a neighbourhood-type zone. The proposal is therefore exempt from public notification in accordance with Clause 2 of Table 5 (Procedural Matters – Notification) of the City Riverbank Zone.

5.6. State Agency Referral

5.6.1. Heritage SA

The 'State Heritage Place Overlay' and 'Heritage Adjacency Overlay' apply to the site, a State Agency referral to **Heritage SA** will be required as the development *'may materially affect the context of the State Heritage Place'*.

The heritage impact assessment for the proposal is discussed in further detail within **Section 6.3**.

5.6.2. Government Architect

The 'Design Overlay' applies to the site within the City of Adelaide and the development exceeds \$10M, therefore triggering a State Agency referral with the Government Architect.

The project team undertook three (3) Design Review Panel sessions as part of the pre-lodgement process and evolution of the architectural and landscape plans.

5.6.3. Adelaide Airport Limited

The 'Airport Building Heights Regulated Overlay' applies to the site, with varied height limits of 90m, 100m and 110m. The proposed 160.77m high tower exceeds these building heights specified in the Overlay and will therefore trigger a State Agency referral to Adelaide Airport Limited.

Thompson GCS were engaged and prepared an Aviation Assessment for the proposal (refer to **Appendix 8**), an aviation assessment has been provided below in **Section 6.10**.

5.6.4. Environment Protection Authority

The previous use of the site was the former Festival Plaza which is classified as 'open space/recreation area' within the land use sensitivity hierarchy of Practice Direction 14 (Site Contamination). The proposed land uses are not classified as 'sensitive uses' and in accordance with Practice Direction 14 (Site Contamination Assessment) the proposal will not result in a change in the use of land to a more sensitive uses.

6. CODE ASSESSMENT

The subject land is located within the **City Riverbank Zone** and **Entertainment Subzone** as indicated within the Planning and Design Code (Version 2025.5). **Figure 6-1** below illustrates the relevant zoning framework for the site and the surrounding land.

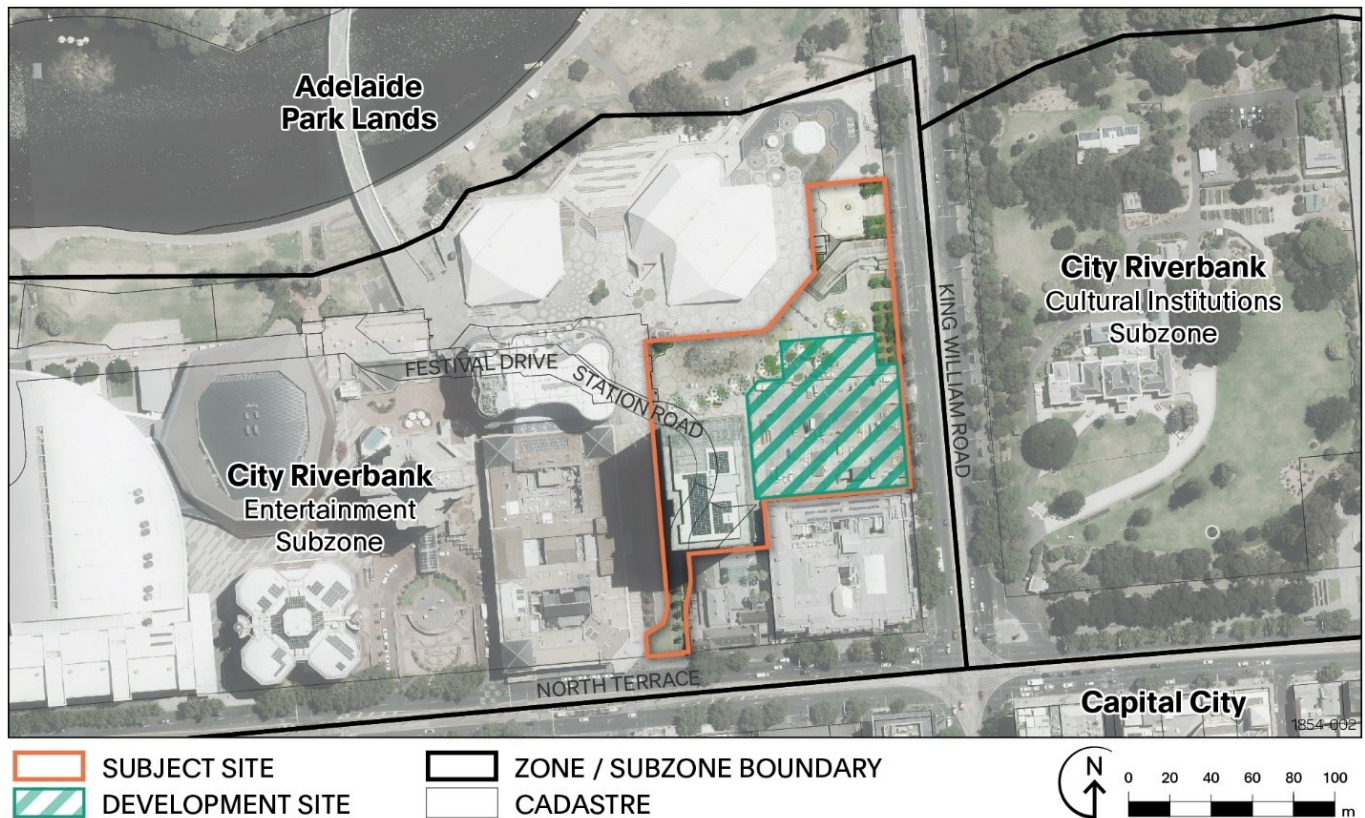


Figure 6-1 Zoning Map

The following section provides an assessment of the proposal against the relevant Planning and Design Code Desired Outcomes (DOs) and Performance Outcomes (POs). This assessment is grouped under a series of headings which address specific aspects of the proposed development.

6.1. Land Use

PO 1.1 of the Entertainment Subzone and PO 1.1 of the City Riverbank Zone are the two key land use policies for consideration of the proposed development.

The Entertainment Subzone seeks “a range of cultural, parliamentary, office, entertainment, retail, conference and ancillary land uses” (PO 1.1). Similarly, PO 1.1 of the City Riverbank Zone seeks similar land uses with an emphasis connecting the city centre to the natural environment of the River Torrens and Adelaide Parklands.

The proposed development primarily consists of ‘office’ use that will accommodate a significant number of office employees located at the site. The introduction of further office employees at the site will assist with activating the existing Festival Plaza and supporting the ‘shop’ uses during non-peak periods (such as events at the plaza or Adelaide Oval).

A combination of restaurants, cafes and/or small shop tenancies are proposed at ground level and level 01. These future businesses are critical to the activation of Festival Plaza and the surrounding laneways. During office work hours, the shops will be supported by Tower 2’s office employees and provide opportunities to entertain visitors or other workers of the CBD to visit Festival Plaza as part of their travels or lunch breaks. During the evening hours, these shops will operate and provide a night-life entertainment opportunity for patrons and contribute to activating the public plaza with passive surveillance and additional pedestrian movements throughout. The rooftop restaurant and bar will provide an additional destination to the site that patrons may seek out and visit Festival Plaza.

The ‘civic space and offices’ will similarly generate office workers on-site but also provide the opportunity for civic activities such as community events and the like. The final selection of civic activities to occupy this space is still to be determined however the space will provide the opportunity for cultural and/or parliamentary activities as sought by PO 1.1 of the Entertainment Subzone.

Overall, the proposed development incorporates suitable and complementary land uses that support Festival Plaza and the Riverbank precinct through activation of the public realm with an increase in patronage and the creation of a unique State significant destinations. Additionally, the direct connection to Festival Plaza connects the development to the public realm and flows onto the Adelaide Park Lands to the north and North terrace to the south.

The proposed land uses align with both PO 1.1 of the Entertainment Subzone and City Riverbank Zone.

6.2. Built Form

The Planning and Design Code seeks to ensure that development achieves an exemplary design quality that is contemporary and innovative within the City Riverbank Zone. The following Code provisions are considered most relevant when assessing the built form component of the proposal.

Zone & Subzone	Overlays	General Development Policies
Subzone: PO 2.1, 2.2, 2.4 Zone: PO 2.1-2.3, 2.5 & 5.1	Design: PO 1.1	Design in Urban Areas: PO 1.3, 1.4, 12.1 to 12.3 & 12.5 to 12.8

JPW have prepared the Architectural Plans (**Appendix 2**) and Architectural Design Report (**Appendix 3**) for the proposed development.

The built form assessment has been broken down into separate sub-headings.

6.2.1. Siting

The Entertainment Subzone seeks development along King William Road to enable views through to important State Heritage buildings and Festival Plaza (PO 2.4).

We understand that PO 2.4 of the Subzone and key landmarks assisted with the preparation of ‘*Concept Plan 153: City Riverbank – Festival Plaza*’ (‘Concept Plan 153’). Regarding the siting assessment, Concept Plan 153 recommends:

- Future development at the site to provide a minimum setback of 9m to Parliament House.
- Preserve view lines to Parliament House’s balcony and north-west corner and the Aedicular Corner (north-east corner).
- Maintain visual and physical access of Festival Centre entrance from King William Road and north-south visual and physical access to Festival Centre from the west of the future building site.
- Green edge maintained and extended to Parliament House along King William Road.

The proposal achieves a setback of 9m to Parliament House between ground level and level 07 to maintain sufficient separation between the State Heritage Place and provide a suitable width for a laneway.

The building provides a staggered setback of approx. 15m and 19m to King William Road, accommodating the additional plantings of Jacaranda trees, while also preserving views of the aedicular corner of Parliament House.

The Parliament House balcony will not be entirely visible from a north-south orientation due to the building footprint of the upper levels. The inclusion of an elevated public plaza opens the design and provides alternative viewpoints to the balcony and will maintain sightlines to Festival Centre. When patrons are located to the north-west in Festival Plaza, the visibility of the balcony will be retained and importantly patrons will have an improved and new viewpoint of the balcony when accessing the elevated public plaza providing a closer perspective.

It is important to note that the approved retail pavilion building resulted in a similar outcome, where the balcony and north-western corner of Parliament House was partially screened and only visible from particular locations within Festival Plaza (as evident in **Figure 2-5** and **Figure 2-6**).

The proposal incorporates a cantilevered design to ensure the visibility of the Adelaide Railway Station is maintained.

The proposed siting of the building enables views to key State Heritage Places and Festival Plaza and is compatible with the outcomes recommended by Concept Plan 153 to achieve orderly development at the site (PO 2.4 Subzone & PO 5.1 Zone). Further assessment of views to State Heritage Places are discussed in **Section 6.3 (Heritage Assessment)**.



Figure 6-2 View to Parliament House Balcony (Source: JPW)

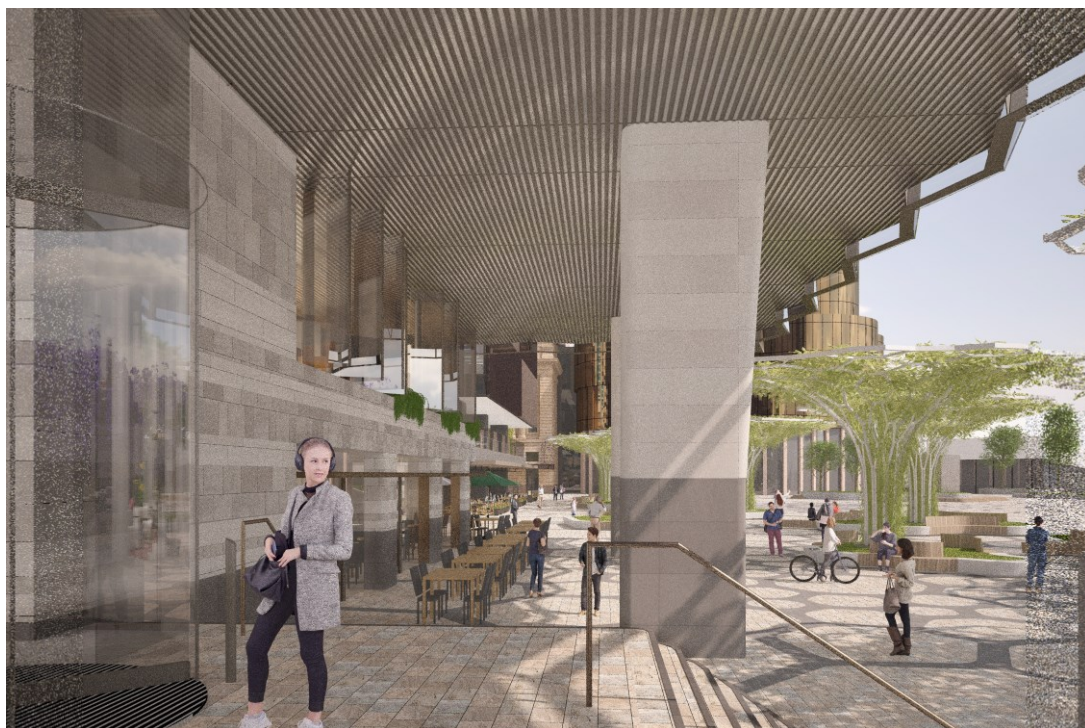


Figure 6-3 Adelaide Railways Station Sightline (Source: JPW)

6.2.2. Scale

The Entertainment Subzone and City Riverbank Zone both seeks taller buildings that are located closer to North Terrace and not adjacent to the River Torrens (PO 2.1 Subzone & Zone). The proposed building is setback approximately 185m to the River Torrens providing sufficient separation, and will form part of the increase in height transition with Festival Tower (115m building height) and Intercontinental Hotel (97m building height).

Tower 2 has a maximum building height of 38 storeys (approximately 160.77m). Concept Plan 153 recommends that a building up to 40 levels could be constructed at the site, we understand this has been informed from investigations undertaken by ARM Architecture and consultation with ODASA. The proposed development is compatible with the Concept Plan 153 with a height of 38 storeys, as sought by PO 5.1 of the Zone.

The Subzone (PO 2.2) does support buildings exceeding a building height of 20 levels or 71m where they will:

- *“Be of exemplary design*
- *Not be located adjacent to the River Torrens*
- *Positively respond to the local context and achieve the design outcomes of the zone”*

The proposed 38 level building height is considered to meet PO 2.2 Subzone’s criteria as the development:

- Is not located adjacent to the River Torrens.
- The proposal is compatible with Concept Plan 153 achieving a similar maximum building height and aligns with the siting of the building.
- The building will positively respond to the local context with an exemplary design and not dominate, encroach or unduly impact on the adjacent State Heritage Places as further analysed in **Sections 6.2.3 & 6.3**.

King William Road’s grand boulevard character shall be maintained with Tower 2’s staggered setbacks of 15m and 19m allowing the open vista, existing street trees and proposed Jacaranda trees to remain key features of the boulevard (PO 2.3 Zone).

PO 2.2 of the Zone seeks to maintain a sense of openness to the sky for pedestrians and allow sunlight to the public plaza. Festival Plaza will remain an open public space with King William Road to the east, Station Road laneway to the west and south-west and the open built environment to the north surrounding Festival Centre. Tower 2 located to the south of the plaza will ensure sunlight to Festival Plaza is maintained throughout the year.

6.2.3. Architectural Expression & Design

Tower 2 has undergone several revisions of the design through a comprehensive design process with three (3) Design Review Panel sessions. Further revisions of the project have been driven by selecting appropriate materials that reflect the existing local context of Festival Plaza and the adjacent heritage buildings.

JPW have prepared two (2) material schedules for the lower levels and upper levels of Tower 2 (as referenced in **Figure 6-4** and **Figure 6-5**) and include:

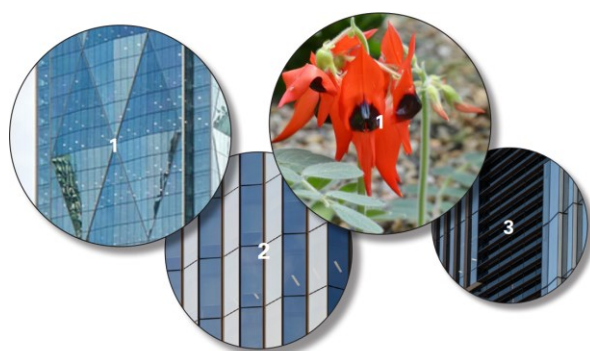
- An escarpment façade surrounding the elevated public plaza and ground level, with striated masonry expression to reflect the significance of escarpment on site.
- Masonry column cladding with rough texture to the lower sections and smooth textures above, providing variation in the design.
- Vertical masonry cladding at the podium and transition floors with bronze elements, located at eastern, southern and western facades of the building, reflecting similar characteristics to Parliament House.
- The civic office levels include a pleated façade forming a visually striking design as a key feature of the building.
- The primary façade incorporates a diagrid pleated façade with silver grey performance glass. This façade has taken inspiration from the South Australian floral emblem the Sturt Desert Pea and reflected its shape with the façade design. This primary façade is the key feature to the north-western and south-western corners of the building. The north-western corner's façade has larger Sturt Desert Pea's to identify this is the prominent façade of the tower and contributes to the crown of the tower.
- Vertical pleated façade with silver grey performance glass as a secondary façade to the eastern half of the building.
- Connecting the primary and secondary façade cladding is silver grey performance glass with a horizontal design and body tint. This provides a darker material that visually separates the two main facades and adds composition and articulation to the design.





- 1 **Escarpment Facade**
Striated masonry expression inspired by local topography and geology, warm in colour.
- 2 **Column Cladding**
Shaped masonry elements, rough texture to lower sections, with smooth texture above, warm in colour.
- 3 **Podium & Transition Floors**
Vertical masonry elements, warm in colour, with bronze elements.
- 4 **Civic Floors Pleated Facade**
Low-iron performance glass facades with expressive geometry responding to Festival Plaza geometry.
- 5 **Tower Secondary Facade**
Silver grey performance glass with body tint for darker appearance than adjacent surfaces. Additional applied sunshading. Single stack joint with ghost transom.

Figure 6-4 Lower Levels Material Schedule (Source: JPW)



Diagrid Pleated Facade:	
1	Silver Grey performance glass with triple low-e coating. Single stack joint with ghost transom. Diagonal patterning references Sturt's desert pea.
Vertical Pleated Tower Facade:	
2	Silver-grey performance glass with triple low-e coating with expressed sunshading. Single stack joint with ghost transom.
Tower Secondary Facade:	
3	Silver Grey performance glass with body tint for darker appearance than adjacent surfaces. Additional applied sunshading. Single stack joint with ghost transom.

Figure 6-5 Upper Levels Material Schedule (Source: JPW)

Tower 2 incorporates a combination of material types and styles at both the lower and upper levels of the tower. The lower levels in particular include varied materials to highlight particular elements and characteristics such as the elevated public plaza and

civic office space. The ground level and elevated public plaza includes facades with a high proportion of fenestration complementing the shop uses to activate Festival Plaza (refer to **Figure 6-6**), King William Road and the laneways activating these spaces. Through a combination of materials and building layouts the tower will result in an activated design that encourages pedestrian activity and interaction, as sought by PO 2.2 of the Zone and PO 12.2 of the Design in Urban Areas module.

The varied glazing facades at upper levels and the definition of lower level materials assist with reducing the visual mass of the tower and breaks components of the design with distinct and feature elements in accordance with PO 12.3 (Design in Urban Areas module).

The King William Road and Festival Plaza foyer entrances are designed to be easily identified for patrons with a generous amount fenestration and awning above the King William Road entrance. Additionally, the stairs leading to the northern foyer from Festival Plaza and the Karrawirra Parri paving pattern leading from King William Road to the tower's entrance will further identify access and assist with wayfinding. PO's 1.3, 12.6 & 12.7 (of the Design in Urban Areas module) seek buildings facing the public realm to convey purpose, clearly identify main accesses and have a pedestrian friendly street frontage whilst complementing the streetscape character, which has been incorporated into Tower 2's design.



Figure 6-6 North-Eastern Corner Façade (Source: JPW)

The lift cores and toilet amenities (within the building) are located in the southern end of the building's footprint to minimise views to these elements from the public realm, whilst the facades fronting King William Road and Festival Plaza are visually more

interesting through their articulated designs. Plant equipment is contained within the mid-rise levels and at level 37, minimising visibility from the public realm (PO 1.4 and 12.8 Design in Urban Areas module).

Through a combination of material types and style, and articulation to define the upper and lower levels of the building has led to an exemplary design that responds positively to the local context of Festival Plaza and adjoining State Heritage Places, satisfying PO 2.2 of the Subzone.

PO 1.1 of the Design Overlay seeks development to demonstrate a high quality design. Tower 2 achieves this through its appropriate siting, scale and architectural expression (and in collaboration with the public realm and landscaping design) as evident in the Architectural Plans and Architectural Design Report.

6.2.4. Sustainability

The Planning and Design Code seeks to ensure that development is sustainable by integrating ecologically sensible design and siting features into the of development. The following Code provisions are considered most relevant when assessing the environmental performance of the proposal:

Zone & Subzone	Overlays	General Development Policies
N/A	N/A	Design in Urban Areas: PO 4.1 to 4.3 & 14.1 & 14.2

D Squared was engaged to prepare a Sustainability Strategy Report and recommend ESD initiatives to the project (refer to **Appendix 6**).

The Sustainability Strategy Report outlines several verified high performance initiatives (and referenced in **Figure 6-7**) that the proposed development shall comply with:

- The proposal shall obtain a minimum 5 Star Green Star certification from the Green Building Council of Australia ('GBCA') using the Buildings v1 Tool.
- The building will be carbon neutral ready following the GBCA Climate Positive Pathway, with a zero net energy carbon outcome, embodied carbon reduced by at least 20%, and water and refrigerant emissions offset to zero via the purchase of Australian A-Grade carbon offset credits.
- The building will be designed and constructed to achieve a minimum 6 Star NABERS Energy rating. The building is also being designed to achieve an overall reduction in energy consumption of at least 20% lower than a 2022 NCC deemed-to-satisfy building.
- The building will be designed and constructed to achieve a minimum 5 Star NABERS Water rating. The building will also achieve a minimum 10% reduction in potable water usage compared to a GBCA reference case.
- The project will obtain WELL Gold certification from the International WELL Building Institute ('IWBI') using the WELL Building Standard v2 Tool. The WELL Building Standard factors in nine categories for consideration including: air, water, nourishment, movement, light, thermal comfort, sound, mind and community.
- The façade design is a thermally broken double-glazed curtain wall system and comprises a carefully engineered balance of insulated spandrel panels (35%) and vision glazing panels (65%) which optimises the balance between energy performance,

thermal performance, and daylight amenity. The façade will be air leakage pressure tested in accordance with AS/NZS ISO 9971:2015 using an ATTMA Licenced testing contractor.

- The building provides excellent daylight access to all occupied areas and exceeds the requirements of the Green Star Buildings v1 and WELL Building Standard v2 daylight criteria.



Figure 6-7 Sustainability Strategy (Source: D Squared)

The building proposes installation of solar panels on the roof of the building, with further details of the panels to be provided at the detailed design stage of the project.

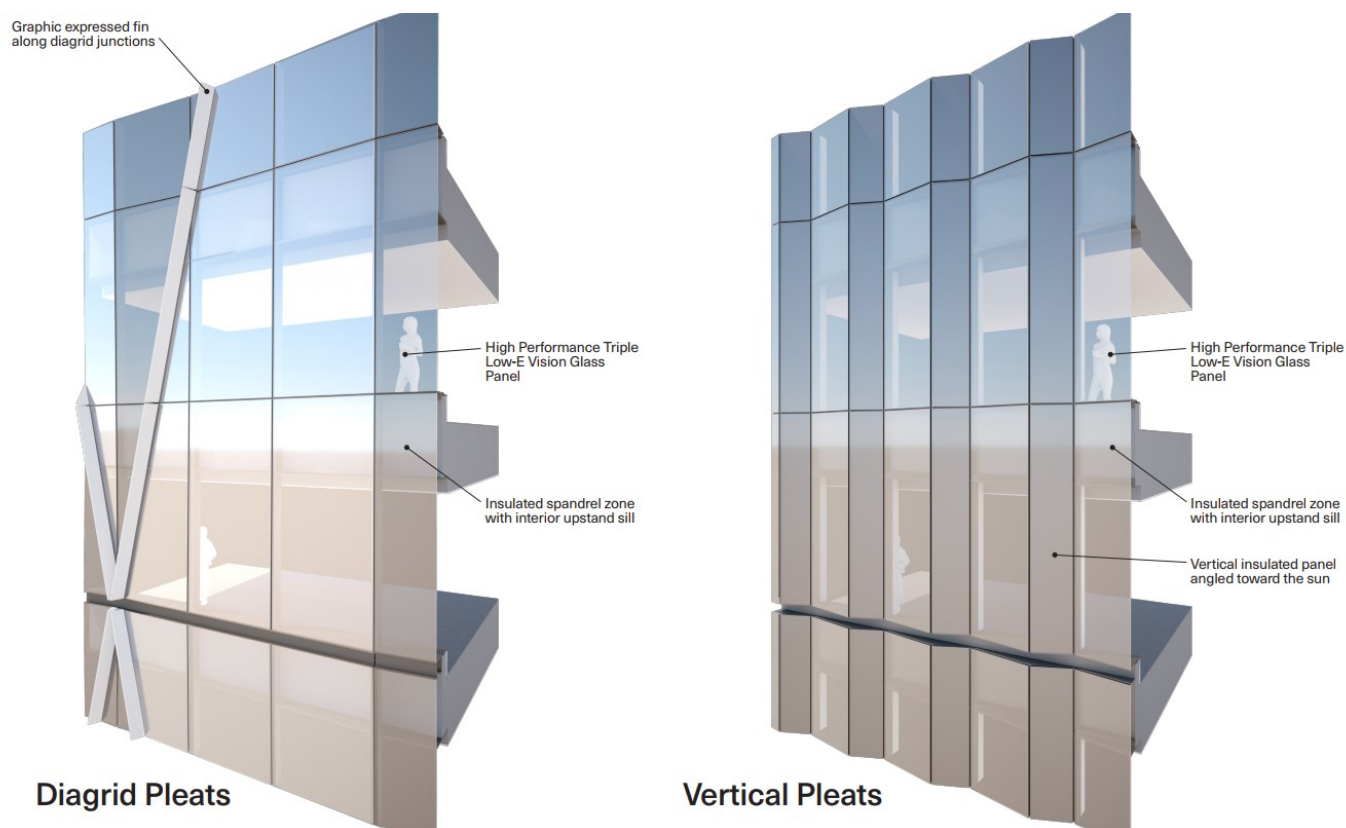


Figure 6-8 Window Diagrams (Source: JPW)

Through the collaboration of D Squared and JPW the project has been designed to maximise natural sunlight access and passive environmental performance with minimising energy and water consumption through a high quality layout, materials and design. JPW have prepared a high level window diagram identifying sustainability benefits of the selected materials (refer to **Figure 6-8**). The proposal demonstrates significant sustainability outcomes will be achieved and is considered to satisfy the environmental Performance Outcomes of the Design in Urban Areas module.

6.2.5. Crime Prevention through Environmental Design

The Planning and Design Code seeks to ensure that development provides a safe and welcoming built form environment for pedestrians and visitors. The following Code provisions are considered most relevant when assessing the environmental performance of the proposal:

Zone & Subzone	Overlays	General Development Policies
Subzone: PO 2.8	N/A	Design in Urban Areas: PO 1.3, 2.1, 2.3 to 2.5, 12.6 & 12.7
Zone: PO 4.4		

The Design in Urban Areas module Performance Outcomes referenced above can be summarised as seeking to:

- Convey purpose and identifying main access points that include passive surveillance opportunities.

- Maximise passive surveillance of the public realm with clear lines of sight and appropriate lighting.
- Ensure street-facing building elevations have pedestrian-friendly and welcoming street frontages.

The proposed development achieves a pedestrian-friendly design as sought by the Design in Urban Areas module provisions for the reasons discussed in **Section 6.2.3 (Architecture Expression & Design)** above.

The Ground Level and Level 01 floorplates include a combination of shops, cafés, restaurants, the elevated public plaza space and the foyer to the tower. The applicant's intention will be to have a combination of shops, cafes and restaurants that operate during the day and/or evening to create a consistent flow of patrons throughout the day. The pedestrian activities will assist with contributing passive surveillance to Festival Plaza, the laneways and King William Road to assist with creating a safe environment.

The elevated public plaza design will provide spatial definition of the public realm that will assist with providing clear sightlines visible within the public realm. ARM's investigations considered the elevated public plaza and enclosure of buildings would improve the sense of security and safety with the overlooking of buildings and the elevated public plaza providing passive surveillance and provide clear sightlines visible within the public realm.

The applicant will work closely with DIT and Renewal SA for a consistent lighting design across the development site and the balance of Festival Plaza.

The proposed development will generate activity during day and night-time to create a safe environment for patrons and workers of Festival Plaza through suitable land uses, passive surveillance of the building, appropriate lighting and clear lines of sight as sought by PO 2.8 of the Subzone and PO 4.4 of the Zone.

The laneways will be further reviewed as part of the detailed design stage of the project and will factor in any additional CPTED upgrades that can be incorporated.

6.3. Heritage Assessment

The Planning and Design Code seeks to ensure that development maintains heritage and cultural values of State Heritage Places. The following Code provisions are considered most relevant when assessing the heritage impact of the proposal:

Zone & Subzone	Overlays	General Development Policies
Subzone: PO 2.4	Heritage Adjacency: PO 1.1	N/A
Zone: PO 2.6, 5.1	State Heritage Place: PO 1.1 to 1.7	

Hosking Willis Architecture ('Hosking Willis') prepared a Heritage Impact Assessment to review and assess the heritage impact of the proposed development, refer to **Appendix 5**.

Hosking Willis determined that the Adelaide Railways Station and Old Parliament House were not part of the heritage assessment as they are sufficiently separated from Tower 2 and factored in the recent completion of Festival Tower.

Hosking Willis has undertaken extensive background history of the site including a review of the 'Adelaide Festival Centre Conservation Management Plan Policies' ('Festival Centre CMP'), 'Parliament House Conservation Management Plan Policies'

(‘Parliament House CMP’) and the progressive development of both Parliament Houses, Adelaide Railway Station and Festival Plaza over the years.

The Festival Centre CMP identified the exceptional significant views from the Festival Centre to King William Road as being a priority policy (refer to **Figure 6-9**), and has since been identified in Concept Plan 153 with the ‘visual and physical access’ recommendations.



Figure 6-9 Significant Views to Festival Centre (Source: Festival Centre CMP, DASH Architects, 2014)

The Parliament House CMP provided the following commentary regarding significant views of Parliament House:

- “Traditionally the most important views of the building have been from North Terrace and King William Street (refer Figure 6-10, View 1, View 2 and View 3). This is reflected by the original design intent of the building in that it was designed to address North Terrace and this hierarchy in importance is visible in the elevations, with south being the most important followed by the east which faces King William Road...
- Distance views of the north elevation, including from King William Road when approaching from the north (refer Figure 6-10 View 4) and from the Festival Centre and associated Festival Centre Plaza (refer Fig 6.2 View 5), have historically been limited by development in the immediate area, and was traditionally considered to be the ‘back’ of the building. When the west wing of Parliament House was completed in 1889, the view from the north was already obstructed by buildings and structures associated with the railway yards and the Government Printing Office... Hence the north elevation was traditionally neither prominently viewed or of high importance, as reflected by its lower level of architectural detail in comparison to the south and

east elevations and the use of artificial granite to the lower ground level of this elevation in the 1939 works... The north elevation as a whole is currently a prominent elevation as a result, despite the view of the lower level being partly obstructed by the height of the plaza which is higher than the original ground level on this side of the building. This view is therefore considered to be of some significance...

- While there are a number of important views of the building which have been generated since 1970, it is not considered that these represent the historically significant views which were important during design and development of the building. The most significant views of the building are those from North Terrace and King William Street (i.e. Views 1, 2 and 3) but Views 1 & 3 has been negatively impacted by the street trees planted in the vicinity of these elevations...
- Although views of the north elevation are currently more prominent due to the relatively recent creation of the plaza associated with the Festival Centre, as these are of less significance it is considered that some future development in the areas immediate adjacent to these elevations should not be discounted if deemed necessary in order to maintain the current Parliamentary use of the building and work is done in accordance with the conditions outlined within this report (refer Section 6.3 – Use). Any new development to the north should still maintain the legibility of the building which should remain evident from the north, both to King William Road and the Riverbank precinct."

[our emphasis]

We understand that the North Terrace and King William Road facades of the State Heritage Place are considered to provide the most important views due to the additional detailing and architectural features on these elevations.

The Parliament House CMP states that the northern façade was traditionally considered as the 'back' of the building and acknowledges that views towards this elevation have previously been obstructed from former development. Notwithstanding, the CMP identifies that the northern façade is 'considered to be of some significance'.

The Parliament House CMP therefore does not discount future development to the north of Parliament House where these views are of less significance. Notwithstanding, new development should still maintain legibility of the building from the north both to King William Road and the Riverbank precinct.

Concept Plan 153 references a 'visual and physical access' arrow that is sited east of Festival Centre to Parliament House. Notwithstanding, we understand and highlight that from the Parliament House CMP this particular viewpoint was not specifically identified in **Figure 6-10**. Instead, the Parliament House CMP broadly identifies the significant view is taken from the northern elevation of Festival Centre and associated southern plaza (refer to View #5 in **Figure 6-10**).



Figure 6-10 Significant Views of Parliament House (Source: Parliament House CMP, Swanbury Penglase 2011)

Festival Centre

The Festival Centre is separated from Tower 2's footprint by approximately 47m with Festival Plaza located in between. The distance between the two (2) is considered to be sufficient for the proposed massing, scale and siting of the development so as to not dominate or unduly impact the heritage value of Festival Centre.

Notwithstanding, Hosking Willis has reviewed any potential impacts to significant views of Festival Centre from the proposed development. The 'exceptional significance' view will remain unimpeded (as evident in **Figure 6-11**). Whilst the 'considerable significance' view will be partially impeded but mitigated through the ground level north-eastern glazed façade facilitating reasonable views of Festival Centre.



Figure 6-11 Proposed development and significant views (Source: Hosking Willis)

Parliament House

Parliament House is sited in closer proximity to Tower 2, and has required further refinement to the built form to develop in a contemporary design that is complementary to the existing surroundings and will not unduly impact the setting of the State Heritage Place.

Hosking Willis and JPW have developed a 9m setback of Tower 2 and Parliament House, as recommended by Concept Plan 153, refer to **Figure 6-12**. The upper levels of the tower (Level 08 and above) will be cantilevered over Parliament Lane. However, the cantilevered portion of the tower maintains visual separation with a 10m high 'clearance zone' above Parliament House's parapets.

Vertical column elements are proposed to the eastern, southern and western elevations to reflect the bracket details of Parliament House, as evident in **Figure 6-13**. The materiality to the backdrop is neutral masonry that reflects the vertical expression of the classical columns from North Terrace and King William Road. Above this, the façade is glazed and the floorplates of the development step out over Parliament Lane.

The material colours and finishes selected respond to those of the surrounding buildings including Parliament House and Festival Tower.

The proposed detailing of the masonry backdrop to Parliament House, when viewed from North Terrace, will provide a neutral and recessive transition in the background to the State Heritage Place.

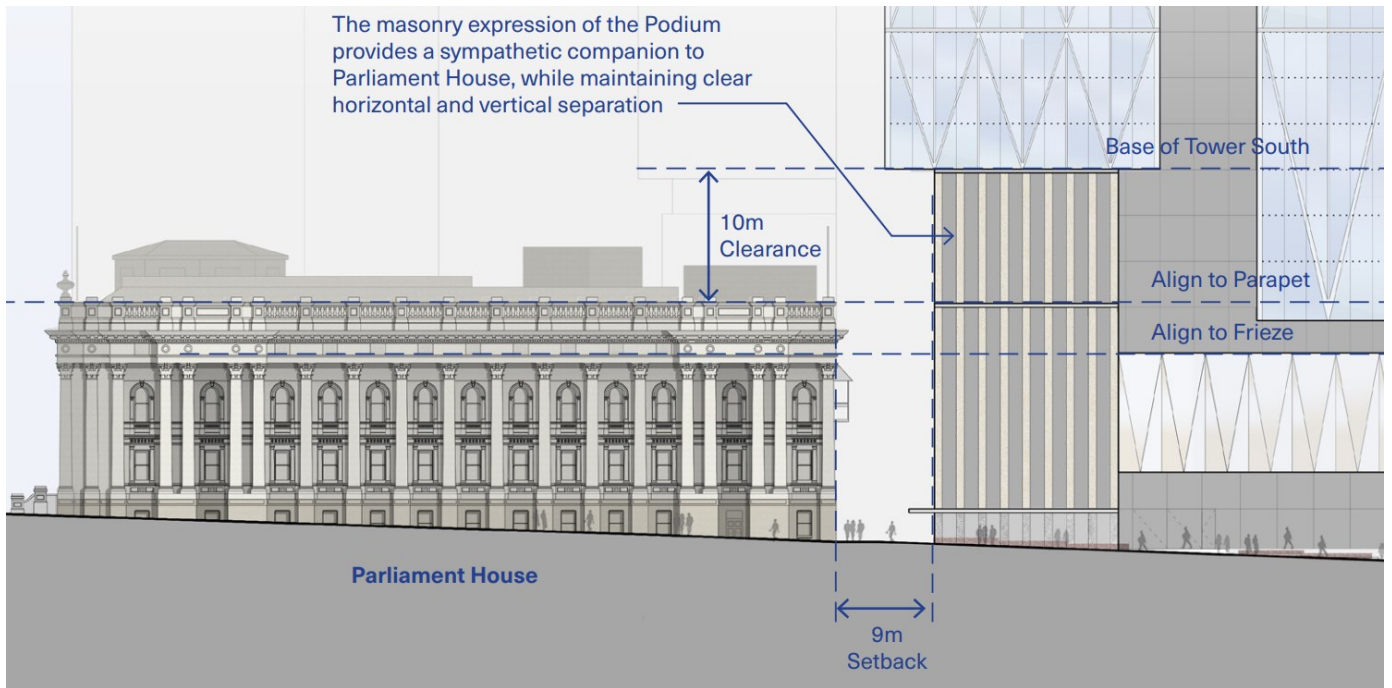


Figure 6-12 East Elevation & Setback to Parliament House (Source: JPW)

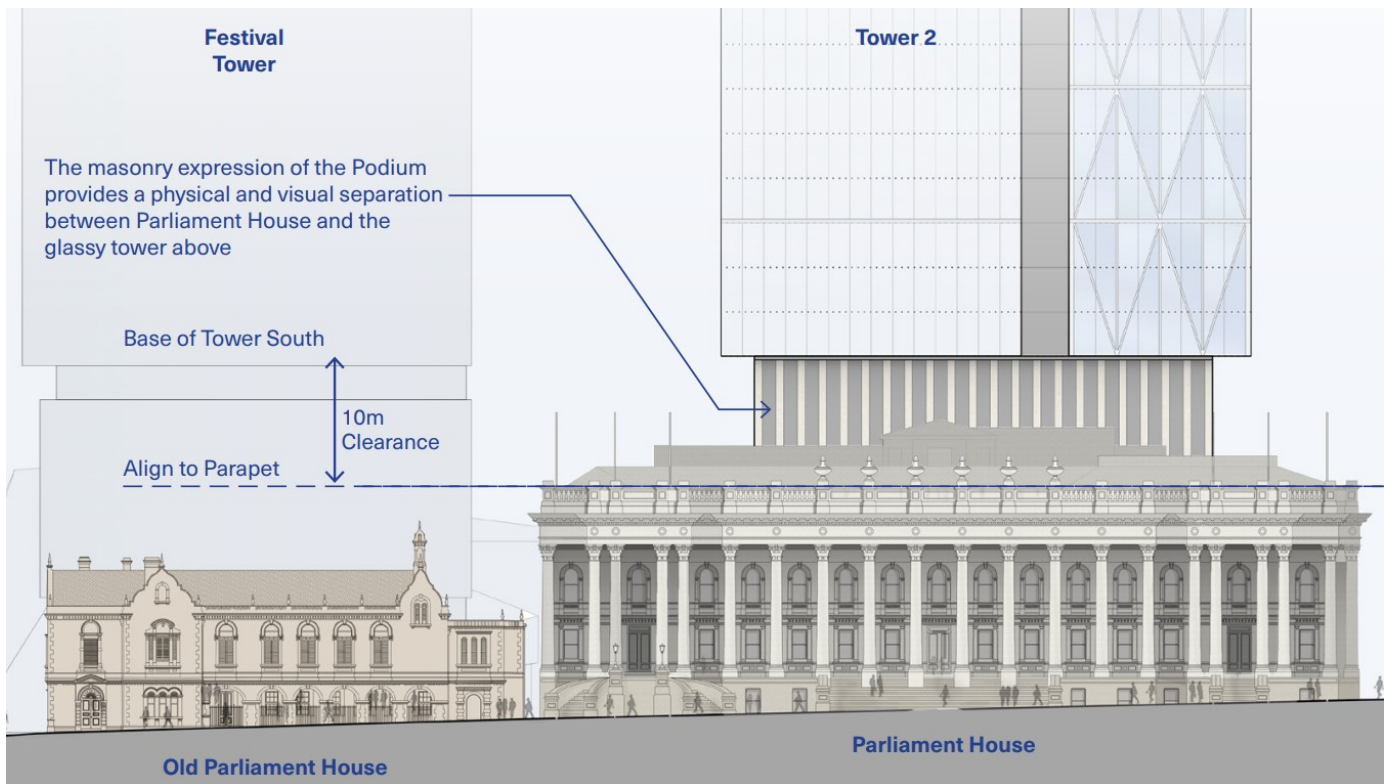


Figure 6-13 Tower 2 & Parliament House Southern Elevations (Source: JPW)

Tower 2 will result in some restriction of northern elevation views of Parliament House, however, will provide improved views of the State Heritage Place in comparison to the existing approval of the retail pavilion building. These views are not considered to have been traditionally prominently viewed or of high importance as stated in the Parliament House CMP. The development is considered to still maintain an appropriate visibility of Parliament House through:

- Setbacks of 15m and 19m from King William Road and glazing facades to retaining key views of the aedicular corner of Parliament House.
- Views from Festival Centre and the north-western area of Festival Plaza will still benefit from views of Parliament House's north-west corner and balcony.
- The elevated public plaza provides a new and closer viewing point for visitors given its height and clear line of sight to the building.
- Parliament Lane will retain existing views of the entire northern façade of Parliament House and assist with defining the lane.



Figure 6-14 Parliament House views from elevated public plaza (Source: JPW)

We consider the proposal appropriately manages views of the State Heritage Place which can continue to be enjoyed and appreciated by visitors.

Through a combination of building siting, architectural expression and material selection, Hosking Willis concluded that the proposed development will not diminish the heritage values of the adjacent State Heritage Places and impacts on views to Parliament House from the north have been minimised.

On review of Hosking Willis' comprehensive assessment, we are of the opinion that the development satisfies the relevant provisions of the State Heritage Place Overlay, Heritage Adjacency Overlay and Entertainment Subzone listed in the table above with the retention of important views of State Heritage Places.

The development provides the opportunity for the elevated public plaza to improve the interface with Parliament House with a publicly accessible space viewing Parliament House from a higher vantage point, in accordance with PO 2.6 of the Zone.

To conclude, the proposal is compatible with Concept Plan 153 aligning with its key recommendations to mitigate impacts to adjacent State Heritage Places, satisfying PO 5.1 of the Zone.

6.4. Public Realm & Landscaping

The Planning and Design Code seeks to ensure that development incorporates a high quality landscaping and public realm design. The following Code provisions are considered most relevant when assessing the environmental performance of the proposal:

Zone & Subzone	Overlays	General Development Policies
Subzone: PO 2.5	Design Overlay: PO 1.1	Design in Urban Areas: PO 3.1, 13.1 to 13.3 & 44.1
Zone: PO 2.4, 2.5, 2.7		

Aspect Studios have previous background knowledge of the site having worked on Festival Plaza and Festival Tower. They have prepared a Landscape Plan and Statement for the proposal, refer to **Appendix 4**.

6.4.1. Landscaping

The proposal has incorporated soft landscaping into the public realm and building design where possible, to enhance the appearance of the streetscape and the public realm.

The King William Road Forecourt incorporates the planting of twelve (12) Jacaranda trees contributing towards deep soil planted trees fronting King William Road. This is an increase of six (6) Jacaranda trees compared to the previous retail pavilion building approval. Importantly, the proposed Jacaranda trees will contribute to the avenue of plantings defining the site along King William Road.

Garden beds are located amongst the Jacaranda trees and the stairs leading to the tower's foyer providing a break in hard surfacing and enhancing the forecourt.

The elevated public plaza's landscaping design is important as a welcoming invitation for the public to visit. The Public Grand Stairs includes garden beds integrated into the design, perimeter plantings to the north and west of the elevated public plaza. A central grassed and decking congregation area with intimate seating areas is a key feature and includes the planting of medium to large trees that will provide shade to patrons.

Parliament Lane provides opportunities for plantings along Parliament House's rear fence to provide a physical buffer (to assist with security measures) and also soften the physical environment and encourage patrons to visit and use future public seating.

Although some of the originally approved arbours (some yet to be built) will be removed to reconfigure the alignment of Festival Plaza, the development supports the use of the existing arbours and proposes to adjust the grove of arbours to enhance the relationship between the building and the plaza.

The inclusion of medium to large trees within the elevated public plaza and at the King William Road forecourt and amended layout to the arbours will assist to reduce the dominance of buildings in the area, provide shading and enhance the spaces for patrons to visit and enjoy. The development satisfies PO 2.4 of the City Riverbank Zone and PO's 3.1, 13.1 and 13.2 of the Design in Urban Areas module.

The Jacaranda trees will thrive with access to sunlight from the east and north, while the elevated public plaza trees will receive northern and partial western sunlight to facilitate healthy growth (PO 13.3 of the Design in Urban Areas module).

The proposed landscaping is dispersed across the development site particularly at key features including the forecourt, the Public Grand Stairs and the elevated public plaza to attract visitors and use the space. A high quality landscaping scheme is proposed to ensure the spaces will function successfully as intended and to complement the existing Festival Plaza design with species (apart from the Jacarandas) to be confirmed at the detailed design stage of the project. Overall, the landscaping aligns with PO 3.1 of the Design in Urban Areas module by enhancing the appearance of the site and streetscape, providing shading opportunities, minimising heat absorption and reflection and assisting to mitigate stormwater with pervious surfaces.

6.4.2. Public Realm

The primary intent of the public realm elements of the development and for Festival Plaza is to create a place of gathering for everyone, similarly to how the Kaurna people would meet at the Karrawirra Pari. The proposal will encourage gathering at the Karrawirra Pari precinct to create a social meeting destination through the means of public infrastructure (seating and tables), hard and soft landscaping, construction of shops, cafés and restaurants and a coordinated design that is complementary to Festival Plaza's existing design and character, to align with PO 2.4 and 2.5 of the Zone.

Aspect Studio and Mantirri Design has identified how the public realm could potentially be used with patrons visiting the site at various times of the day (refer to **Figure 6-15**). The patron activity and pedestrian movements have been guided by the active frontages, envisaged land uses and connectivity through the Riverbank and Adelaide Oval to Festival Plaza to the CBD and to the Adelaide Railway Station as evident in **Figure 6-16**. Importantly, the elevated public plaza will remain open to the general public at all times and function as an extension to the existing Festival Plaza public realm.

Ultimately the laneways could be populated throughout all times of the day and with the elevated public plaza being used more during midday to evening where it receives direct sunlight and views to the river at night. The development encourages opportunities for patrons to connect with Festival Plaza as a result of the patron activity and activation of the site providing passive surveillance and through upgrade of public realm amenities including public toilets and seating. Notably, the development will not restrict the operation and function of Festival Plaza and still allow for larger scale events and functions to occur within the public realm, with the opportunity for the development to be incorporated to these activities.

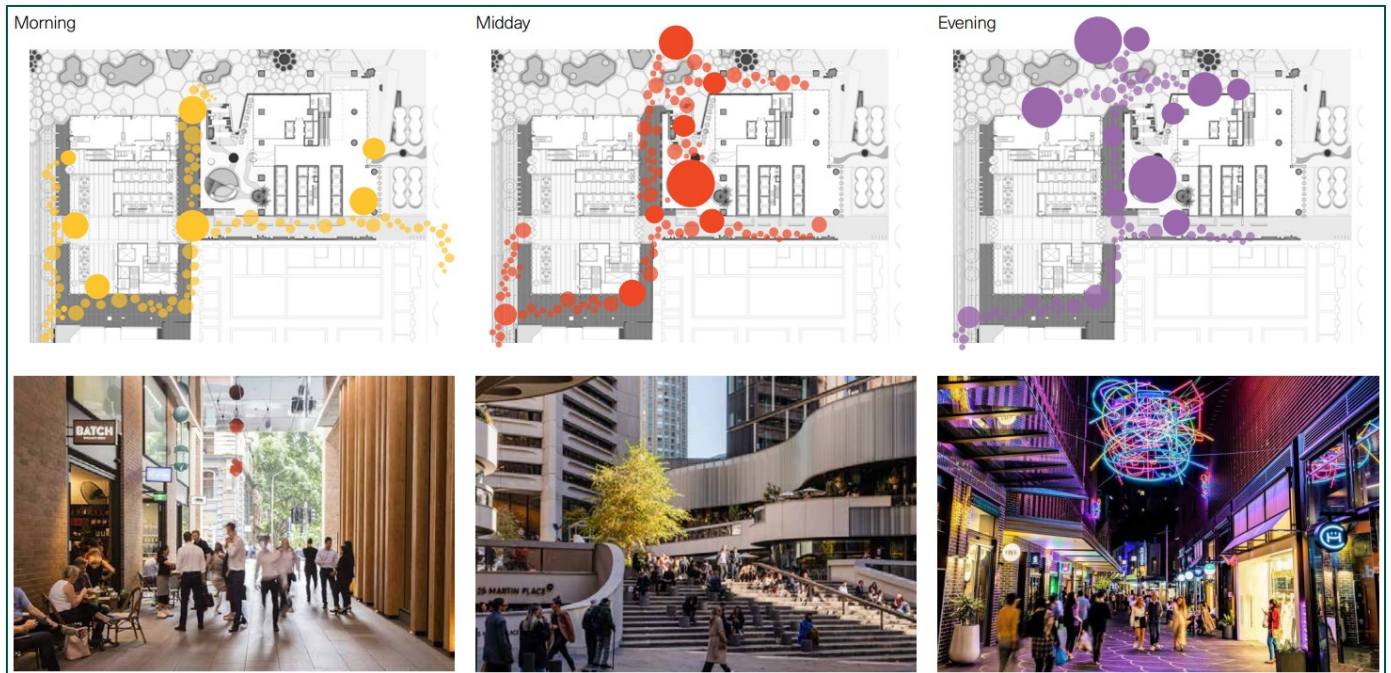


Figure 6-15 Public realm user experience (Source: Aspect Studios & Mantirri Design)

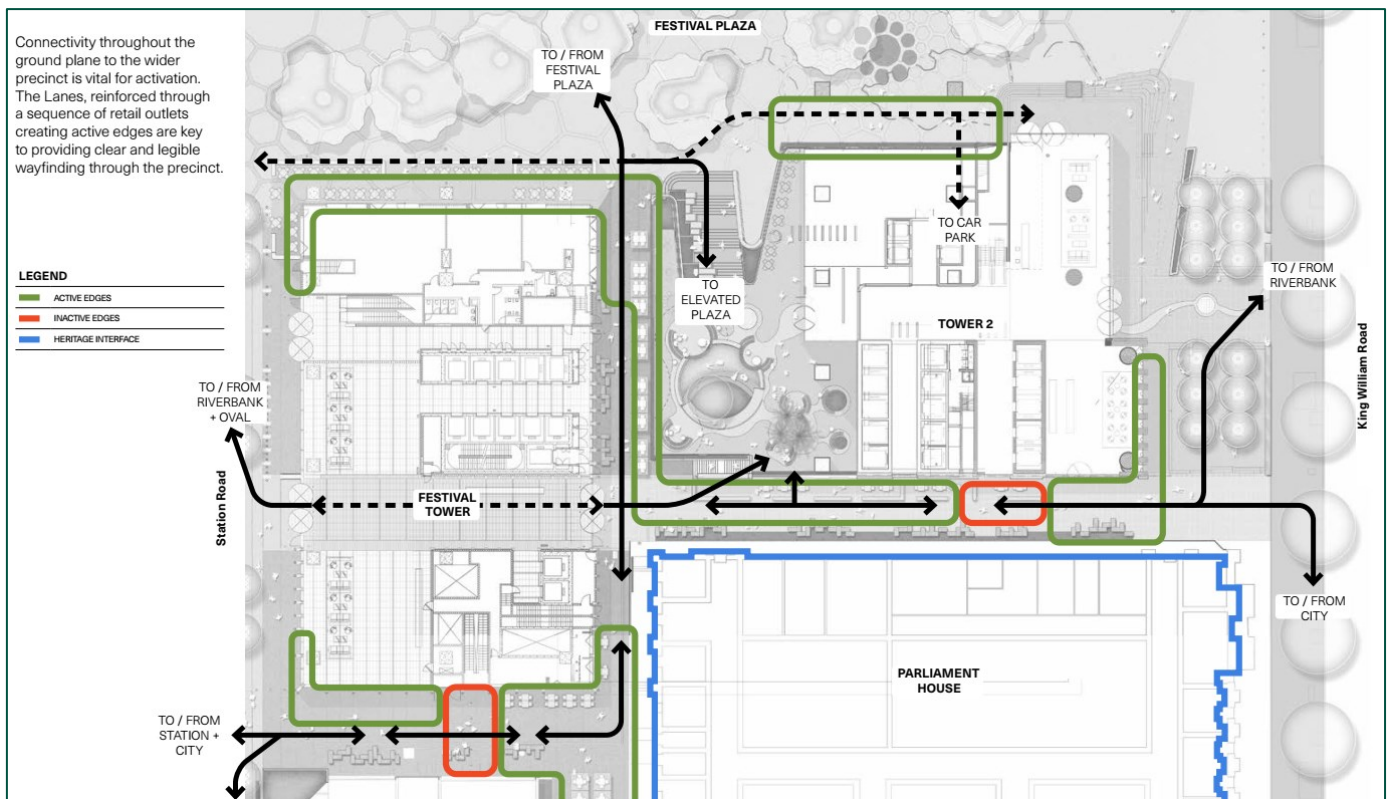


Figure 6-16 Pedestrian Movements (Source: Aspect Studios & Mantirri Design)

The perimeter of the building, apart from the Public Grand Stairs and northern foyer's entrance, has been designed to maintain a single plane grade with existing Festival Plaza levels and future laneway and forecourt levels, as envisaged by PO 2.5 of the Subzone to maximise pedestrian activity opportunities.

The public realm areas (and foyer of the building) have incorporated reflective Kaurna themed public artwork as part of design. The Karrawirra Parri and Wodlipari paving pattern flows through the King William Road forecourt to the building's foyer and out onto the elevated public plaza. The circular paving within the elevated public plaza represents the ephemeral waterholes that are significant within Karrawirra Parri. Both the elevated public plaza and forecourt provide a reflective Kaurna themed public artwork or sculpture, that will be further developed and consulted with a local artist and stakeholders. The proposal recognises the Karrawirra Parri's significance with it being reflected in the paving design of the building and provides opportunities further story telling and reinforcing identity of the Karrawirra Parri precinct, in accordance with PO 2.7 of the City Riverbank Zone.

The proposed laneways are intended for pedestrian use only (with the exception of maintenance and service cleaning vehicles, i.e. street cleaners) to create a friendly and safe environment for patrons. The levels of the laneways will be designed to match the public realm at King William Road, Festival Plaza to the north and Festival Tower to the west. The laneways will be further reviewed at the detailed design stage of the project, notwithstanding, the concept designs satisfy the intent of PO 44.1 (Design in Urban Areas module).

The proposed public realm and landscaping scheme are of a high quality design to complement Tower 2, Festival Tower, King William Road streetscape and most importantly Festival Plaza to ensure the existing public use of the plaza will be enhanced (PO 1.1 Design Overlay).

6.5. Advertising

Three (3) nominated building signage zones are located on the northern, western and southern facades. The northern signage zone is located on the subordinate façade and not the main (north-eastern corner) façade and crown. The signage zone is designed to be of a scale similar to other examples in the Adelaide CBD (and Festival Tower) and will complement the proposed building's design without detracting from the high quality design, as sought by PO 3.1 of the City Riverbank Zone.

6.6. Wind Assessment

MEL Consulting ('MEL') undertook a Wind Study of the proposed development at Festival Plaza, refer to **Appendix 7**.

A wind tunnel model study was commissioned by the applicant to investigate the environmental wind effects of the proposed development and, if necessary, to develop wind amelioration features to achieve conditions satisfying the recommended environmental wind criteria. This study was undertaken in the MEL's 400kW Boundary Layer Wind Tunnel during March 2025.

As part of MEL's methodology and assessment criteria, it was noted that the Planning and Design Code does not recommend a particular set of criteria for pedestrian wind comfort or safety. MEL's assessment utilises the comfort and safety criteria specified in the Victorian Planning Schemes which are internationally recognised to inform their assessment.

MEL has used the following wind criteria suggested for the surroundings of the building and public realm:

- Public Transit Areas = Walking Comfort Criterion

- Building/Tenancy Entrances = Standing Comfort Criterion
- Outdoor Terraces = Walking Comfort Criterion
- Outdoor Seating Area (e.g. Café) = Sitting Comfort Criterion

The wind study results are summarised below in **Table 6-1**.

Table 6-1 Summary of wind study results (Source: MEL)

King William Road	The wind conditions along King William Road were demonstrated to pass the walking comfort criterion as a minimum.
North Terrace	The wind conditions along North Terrace were demonstrated to pass the walking comfort criterion as a minimum.
Station Road	The wind conditions along Station Road were demonstrated to pass the walking comfort criterion as a minimum. Wind conditions were shown to be similar to those of the existing wind conditions, indicating the Proposed Festival Plaza Tower 2 Development has little adverse impact on wind conditions along this street.
Festival Plaza	<p>The wind conditions within Festival Plaza were demonstrated to pass the walking comfort criterion except for test locations #24 and #31 (located at the north-west corner of Festival Tower and directly north of Festival Tower within the plaza).</p> <p>Test locations #24 and #31 have been shown to exceed the walking comfort criterion and with conditions at Test Location 31 failing the pedestrian safety criterion. Wind mitigation measures for these locations are currently being reviewed and developed by Walker in a separate exercise.</p> <p>Notwithstanding, the wind conditions have been shown to be comparable to the Existing Configuration at these test locations, indicating the Proposed Festival Plaza Tower 2 Development has no significant influence at these locales.</p>
Perimeter of Tower 2 (i.e. 'Adjacent to the Development')	The wind conditions around the perimeter of Tower 2 were demonstrated to pass the walking comfort criterion, with the exception of test locations #45 and #47 which have been shown to fail the walking comfort and pedestrian safety criteria respectively. Test location #45 is located at the south-western corner of Tower 2 and location #47 is sited south of the elevated public plaza within Parliament Lane.

MEL's investigations demonstrate that the inclusion of a 3m wide canopy around the south-eastern corner of Tower 2 (refer to **Figure 6-17**) will improve wind conditions to achieve walking comfort criterion at location #45 and standing comfort criterion at location #47.

As potential locations for outdoor seating (test locations #40, #41, #47 and #49), the use of local screening (solid, and of typical height of 1.5m) around these areas for wind mitigation would be effective in achieving the sitting comfort criterion thereby satisfying the recommended wind conditions for outdoor seating.



Figure 6-17 Recommended wind mitigation measures (Source: MEL)

Old Parliament House & Government House (i.e. Neighbouring Premises)

The wind conditions at Old Parliament House and Government House were demonstrated to pass the walking comfort criterion as a minimum.

Elevated public plaza (i.e. Podium at Level 1)

The wind conditions for elevated public plaza (test locations #56-61) have been shown to pass the walking comfort criterion as a minimum.

Inclusion of solid screens near test locations #56 and #58 (refer to **Figure 6-18**) would be effective in achieving the sitting comfort criterion thereby satisfying the recommended wind conditions for outdoor seating and building entrance at these locations.

The conditions at the additional location on the elevated public plaza (test locations #59–61) were shown to achieve the walking and standing comfort criteria. Should an improvement in the wind conditions at these locations be required, then additional screening, landscaping features and canopy elements (already shown on current drawings) would be expected to provide a beneficial mitigation effect. Such mitigation measures should be developed and tested for effectiveness with further wind tunnel testing.

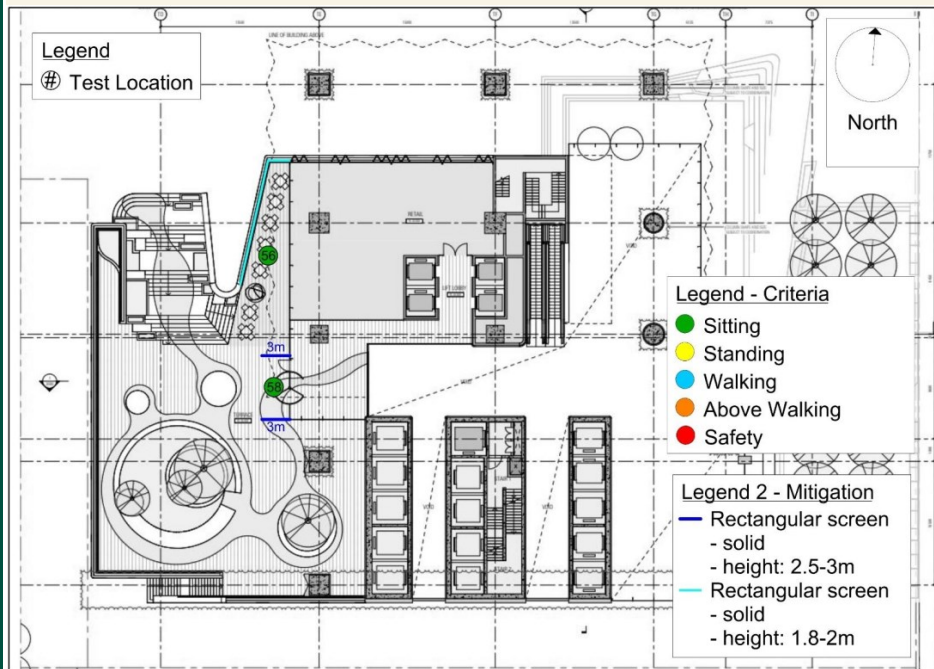


Figure 6-18 Elevated public plaza Mitigation Measures (Source: MEL)

Podium at Level 04

The wind conditions at the level 4 terrace (test locations #T1-T3) have been shown to pass the standing comfort criterion as a minimum, with test location #T2 also passing sitting comfort criterion.

MEL's assessment generally concludes that the test locations will meet the minimum comfort criterion prescribed and at times are an improvement to the existing conditions. MEL has recommended mitigation measures for JPW and the applicant to consider as part of the design. The architectural plans have been updated to incorporate a canopy to the south-eastern and southern façade of Tower 2 as recommended by MEL to improve the wind conditions.

On review of MEL's wind study assessment, the proposal demonstrates that the development site and surrounding areas will not be unreasonably impacted by wind conditions following construction of Tower 2. Further mitigation measures will be reviewed by the applicant and project team as part of the detail design stage of the project to further improve wind conditions where possible. For these reasons, the proposed design satisfies PO 2.2 of the Zone and PO 14.1 and 14.3 of the Design in Urban Areas module to ensure that the site and adjacent locations will remain safe and functional for their intended purposes.

6.7. Loading & Parking

The Planning and Design Code seeks to ensure that development can appropriately manage loading and deliveries, and provides an appropriate basement layout for end of trip facilities and car parking. The following Code provisions are considered most relevant when assessing the loading and parking of the proposal:

Zone & Subzone	Overlays	General Development Policies
N/A	N/A	Transports, Access & Parking module: PO 4.1, 5.1, 6.6 & 9.1-9.3

Wallbridge Gilbert Aztec ('WGA') prepared a brief loading and car parking assessment to review the amendments proposed within the basement car park (refer to **Appendix 11**).

6.7.1. Loading Considerations

The loading dock will remain as existing, apart from the inclusion of one (1) additional small rigid vehicle loading dock.

WGA has reviewed existing data of vehicles using the loading dock used by Festival Tower and prepared projected volumes of loading vehicles attending the site to service Festival Tower and Tower 2. The loading dock is expected to accommodate up to 13 vehicles per hour.

On the basis of projected figures, WGA expects that during periods of high loading activity (i.e. 9:00am to 10:00am) the loading dock will likely be at capacity, with loading vehicles required to wait. In order to satisfactorily accommodate the post development loading and waste collection activities, WGA recommends the adoption of the following operational measures to mitigate any delays and congestion within the dock:

- *"Implement a dock management system (e.g. Veyor or similar) which provides a consolidated booking system and allows the building / dock manager to specify which vehicles can access specific loading bays, as required.*
- *The implementation of a dock management system would enable the peak loading and waste collection activity to be distributed evenly throughout the day and will minimise queuing and delays within the dock.*
- *Coordinate longer durations, such as maintenance or fit-out works, to occur outside of peak loading periods such as 9:00am to ensure sufficient turnover of loading bays.*
- *Employ a dock manager or dock hand to ensure compliance with the dock management system and limit the occurrence of overstay.*
- *Request that visitors conduct a site induction prior to accessing the loading dock so that they are aware of the necessary procedures and expectations."*

WGA supports the proposed loading dock arrangement with the above recommendations implemented to adequately service the loading and waste collection activities generated by Tower 2 and Festival Tower (PO 6.6 Transport, Access and Parking module).

Refuse management is specifically assessed below in **Section 6.8 (Waste & Service Management)**.

6.7.2. Parking

The proposed development will reduce car parking numbers from 1,382 to 1,354 spaces throughout the basement. Following the amended layout within the basement the car park design has been updated to align with 'Australian Standard for Parking Facilities: Off-street Car Parking' (AS2890.1) and 'Australian Standard for Parking Facilities: Off-street Parking for People with Disabilities' (AS2890.6), as confirmed by WGA (PO 4.1 of the Transport, Access and Parking module).

Table 2 (Off-Street Car Parking Requirements in Designated Areas) does not prescribe a minimum nor maximum theoretical parking rate to development within the City Riverbank Zone. The proposed reduction in car parking therefore aligns with PO 5.1 of the Transport, Access and Parking module, with the site benefiting from access to public transport opportunities abutting the site.

The proposed basement amendments include 243 bicycle parking spaces to Tower 2 with end of trip facilities including lockers, toilets, and showers.

Table 3 (Off-Street Bicycle Parking Requirements) of the Transport, Access and Parking module prescribes the following relevant theoretical minimum parking rates:

- *"Office: 1 space for every 200m² of gross leasable floor area plus 2 spaces plus 1 space per 1000m² of gross leasable floor area for visitors.*
- *Shop: 1 space for every 300m² of gross leasable floor area plus 1 space for every 600m² of gross leasable floor area for customers."*

'Civic space and office' is an undefined land use and therefore does not have a prescribed theoretical minimum parking rate. We understand the 'civic space and office' will have a GLFA of approximately 3,000m². As the land use will have a combination of office use and traditional civic space, we have applied the 'office' theoretical minimum parking rate to half of the GLFA (1,500m²), and expect the balance of the site to be used for a traditional civic space.

To determine the theoretical minimum of bicycle parking spaces on site, the following GLFA break down of land uses has been considered:

- Approximately 47,000m² of 'office' use;
- Approximately 1,500m² of 'civic office' use (i.e. using the 'office' prescribed theoretical minimum parking rate); and
- Approximately 1,550m² of 'shop' use.

Based on these GLFAs and theoretical minimum bicycle parking rates we have determined the Code recommends a theoretical minimum of approximately 301 bicycle parking spaces.

Although the theoretical parking minimum has not been achieved the proposal provides a high quality end of trip facility with plenty of showers, lockers and toilets for employees to benefit from. The facility includes an ancillary wellness centre and gymnasium. These additional facilities encourage employees to utilise the end of trip facilities due to their quality. The development will be designed to obtain relevant 5 Star Green Star certification which will review the end of trip facilities as part of this assessment and ensure they are of a high quality standard for workers.

The site is located next to the most accessible public transport hub in Adelaide. Employees have access to all Adelaide railway networks, both tramline networks and bus stops along North Terrace and King William Road and Street. The site is very accessible to high frequency public transport and the proposed number of bicycle parking spaces is sufficient with the balance of area accommodating high quality end of trip facilities to promote active transport modes (including walking). For these reasons the proposed development satisfies PO 9.1 to 9.3 of the Transport, Access and Parking module, regarding bicycle parking.

6.8. Waste & Service Management

The Planning and Design Code seeks to ensure that development can appropriately manage waste and accommodate all envisaged refuse and service vehicles. The following Code provisions are considered most relevant when assessing the service and waste management of the proposal:

Zone & Subzone	Overlays	General Development Policies
N/A	N/A	Design in Urban Areas: PO 1.5, 11.1 to 11.5 & 35.3 to 35.5

Rawtec prepared a Waste Management Plan to demonstrate how the proposal will be appropriately serviced (refer to **Appendix 9**).

Festival Tower's waste is collected and stored within the western half of Level B2 of the basement. Refuse vehicles access the basement via Festival Drive. Tower 2 will continue to collect refuse from this loading dock and convert a former store into a waste storage room. Refuse will be screened from the public located within the back of house facilities of the basement, as sought by PO 1.5, 11.2, 35.3 & 35.4 of the Design in Urban Areas module.

The proposal includes one (1) additional small rigid vehicle bay within the existing loading dock, and refuse and service vehicles will continue to enter and exit in a forward motion (PO 11.4 & 35.5 Design in Urban Areas module). The loading dock will therefore provides two (2) medium rigid vehicle bays, three (3) small rigid vehicle bays and a separate Parliament House loading dock to service the refuse and delivery vehicles.

Festival Tower's refuse area will continue to operate as per the current arrangement within the basement and loading dock. Rawtec has identified potential upgrades to Festival Tower's waste room with amended doors and layout, improving access for collection of bins. These upgrades will not increase or decrease the number of bins stored on site. This is not proposed on the architectural plans but may be reviewed in the future.

Refuse will be taken down the basement via the goods lift and stored within the waste room in close proximity to the loading dock, the waste transfer pathway is referenced in **Figure 6-19**.

Tower 2 will have the same waste services as Festival Tower, additional services such as compaction/baling and comingled/mixed recycling services may be considered in the future.

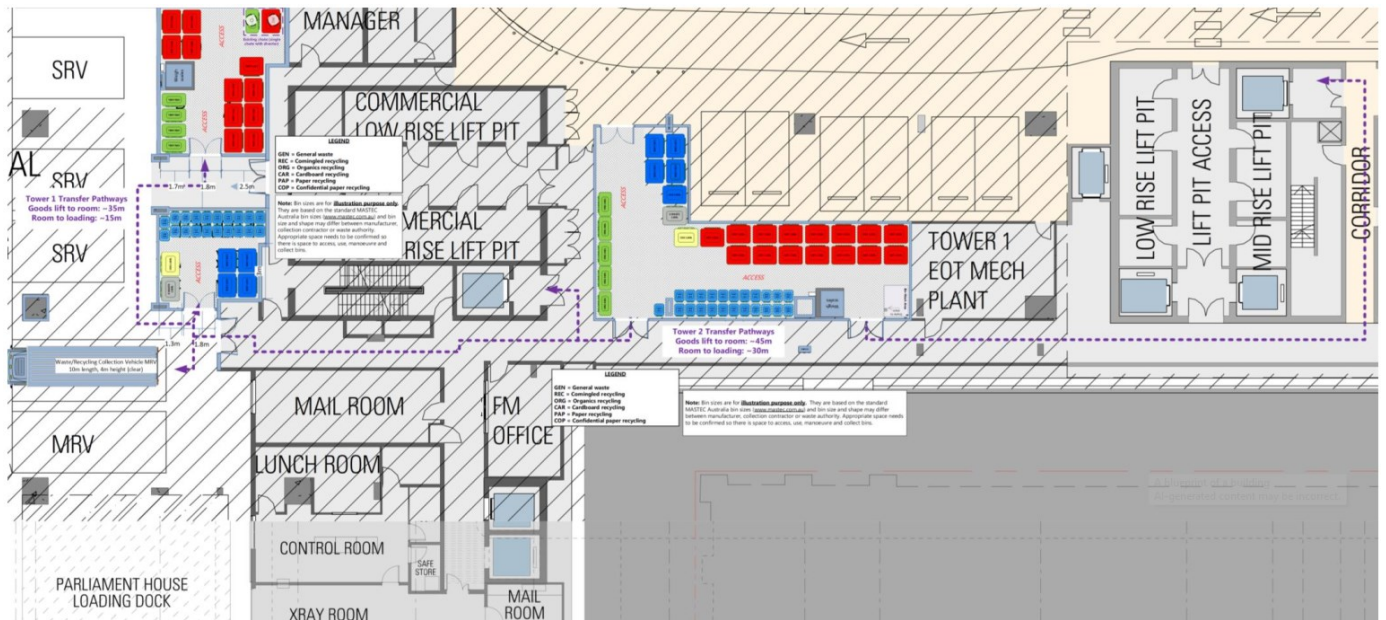
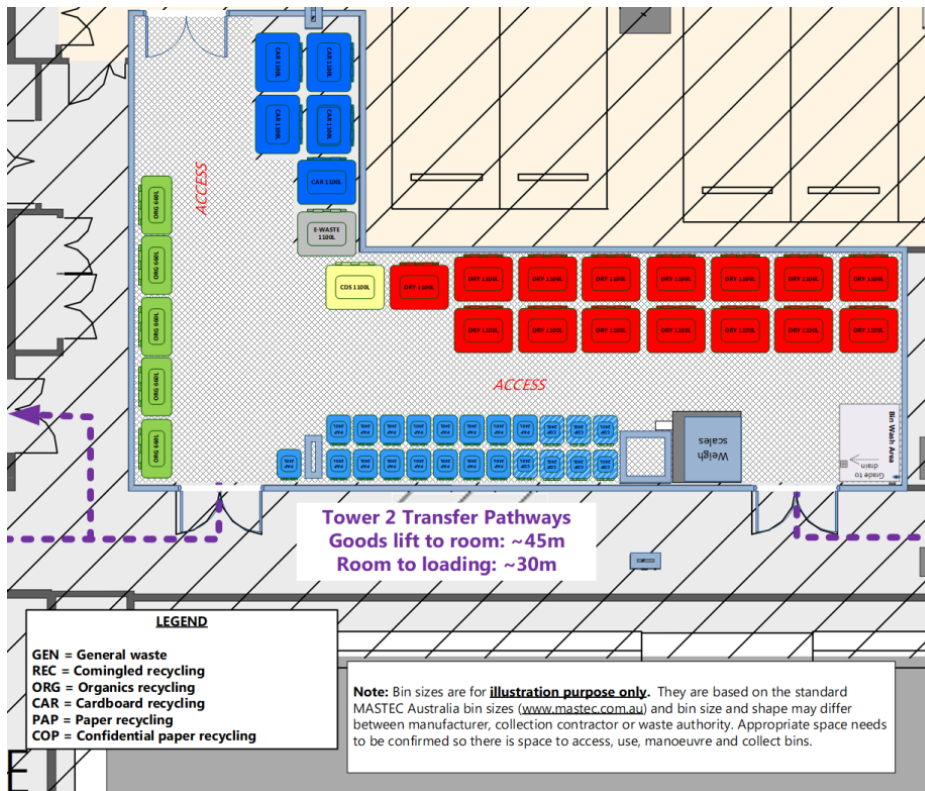


Figure 6-19 Tower 2 Waste Room Layout & Transfer Pathway (Source: Rawtec)

Rawtec's assessment has considered waste generated from tenants of both Festival Tower and Tower 2, to ensure that the existing loading dock will be able to accommodate their estimated volume of waste and recycling generated. Rawtec's estimations have used existing waste data from Festival Tower which was at 70% occupation at the time of preparing their report.

Rawtec estimates that Festival Tower generates 140,000 litres of waste per week, whilst Tower 2 is estimated to generate 169,700 litres of waste per week. Resulting in a total of 309,700 litres of waste per week, as referenced in **Figure 6-20**.

To store the estimated waste generated the proposal will require 95 bins (of various sizes) on site, each building requires 26 waste collections per week. The applicant can therefore coordinate collection of waste to occur on the same day, to not result in an increase in frequency of refuse vehicles attending the site.

The proposed waste storage room has sufficient room to accommodate the estimated number of bins (and variety of bins) required to service Tower 2, and includes a wash bay facility for ongoing maintenance, as sought by PO 11.1 and 11.5 (Design in Urban Areas module).

The proposed service and waste management plan will utilise the existing loading dock and provide a waste storage room that will sufficiently accommodate enough bins to service Tower 2 appropriately whilst also factoring in the existing requirements of Festival Tower.

Estimated waste generation volumes (litres per week)									
Land use type	Tower 1				Tower 2				
Development land use	Tower 1 - Offices	Tower 1 Restaurant	Tower 1 Retail	Tower 1 Total	Tower 2 Offices	Tower 2 Restaurant	Tower 2 Retail	Tower 2 Total	Total
WRGR classification	<i>Festival Tower 1 Offices</i>	<i>Festival Tower 1 Restaurant</i>	<i>Retail - Less than 100m2</i>		<i>Festival Tower 1 Offices</i>	<i>Festival Tower 1 Restaurant</i>	<i>Retail - Less than 100m2</i>		
Organics recycling	14,300	500	30	14,830	14,900	1,300	200	16,400	31,200
Mixed paper/cardboard recycling	20,500	1,500	100	22,100	21,400	3,500	1,000	25,900	48,000
Paper recycling	18,400	NE	NE	18,400	19,100	NE	NE	19,100	37,500
CDS recycling	1,600	NE	NE	1,600	1,600	NE	NE	1,600	3,200
Dry waste	73,300	4,800	700	78,800	76,300	11,700	5,000	93,000	171,800
Confidential paper recycling	4,300	NE	NE	4,300	4,500	NE	NE	4,500	8,800
Total site volume	132,400	6,800	800	140,000	137,800	16,500	6,200	160,500	300,500

*Totals have been rounded and may not equate

NE = Not Estimated as Not Required

Figure 6-20 Estimated volume of waste and recycling generated at the development (Source: Rawtec)

6.9. Stormwater Management

The Planning and Design Code seeks to ensure that development can appropriately manage stormwater and mitigate flood impacts. The following Code provisions are considered most relevant when assessing the stormwater management of the proposal:

Zone & Subzone	Overlays	General Development Policies
N/A	Hazards (Flooding – Evidence Required): PO 1.1	Design in Urban Areas: PO 42.2 & 42.3

Mott Macdonald have prepared a Stormwater Management Plan for the proposed development, refer to **Appendix 12**. Mott MacDonald were involved with preparing the Festival Square Stormwater Management Plan in 2015 for Festival Tower.

Majority of stormwater infrastructure has been implemented on site as part of the Festival Plaza and Festival Tower works. Mott Macdonald notes that all under-slab drainage has been constructed as part of the carpark works completed in 2020 with capped connections at the top of slab (refer to **Figure 6-21**). Exact locations of these connections will be coordinated during the detailed design stage of the project.

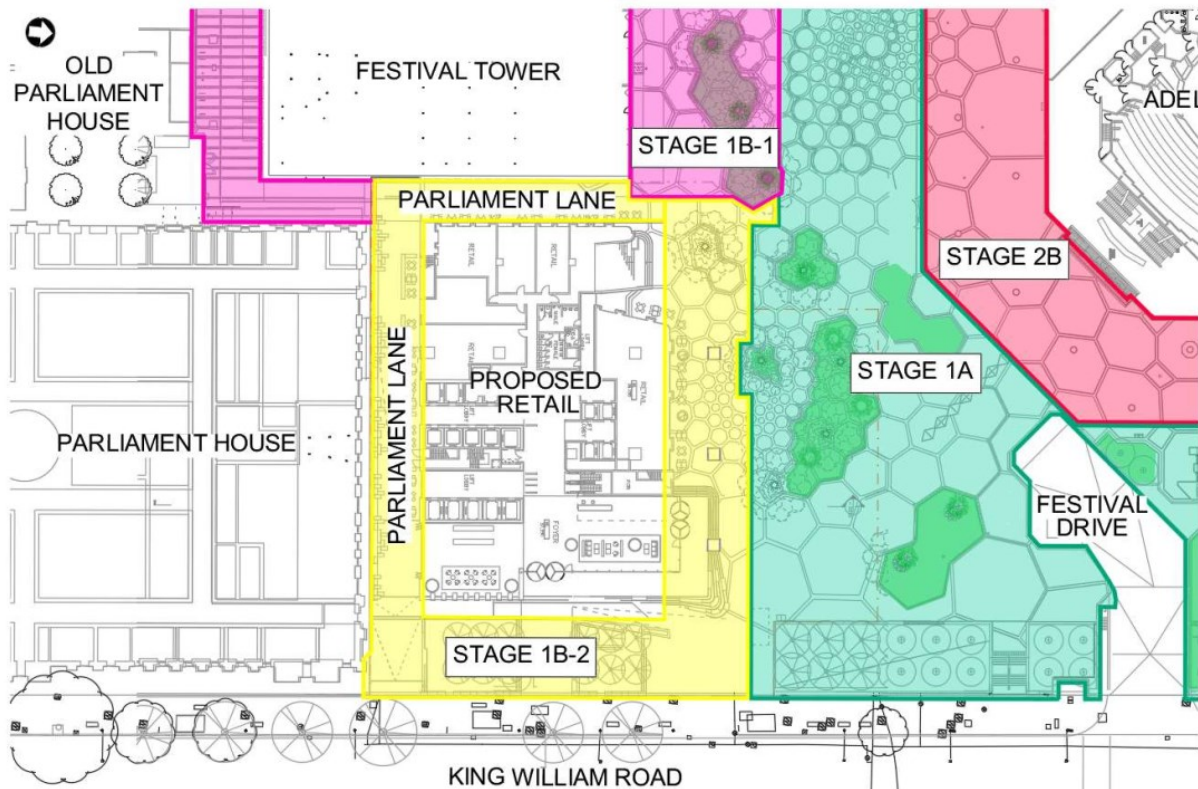


Figure 6-21 Festival Plaza stormwater management stages (Source: Mott Macdonald)

The proposed drainage system for Tower 2 and the surrounding incomplete public realm works will include:

- 100mm wide trench drain along the low point of Parliament Lane between Festival Tower and Tower 2 connecting to the existing B1 drainage pipes.
- Series of 100mm wide trench drain along south Parliament Lane between Tower 2 and Old Parliament House. These trench drains will have new connection to the existing B2 DN375 drainage pipe.
- DN150 uPVC pipes on the plaza level to be provided for downpipe connections on the east and western ends of Tower 2. The location of the downpipe connection pipes are shown indicatively and will need to be further coordinated in the detail design stage. These pipes will connect to the existing DN375 pipe in B2 basement.
- 100mm trench drain along the boundary between Stage 1A and Stage 1B-2 as the low point between the two stages. There will be multiple trench drain outlets connecting to the existing B1 basement drainage pipes.

The existing stormwater pipes within the plaza area (on basement levels) were designed and constructed to cater for storms up and including 100 year ARI storm events. The capacity and freeboard requirements for the pit and pipe network had previously

been assessed on DRAINS and demonstrated compliance to the freeboard requirements in the minor storm and overland flow criteria for the major storm.

As per the previous Festival Square Stormwater Management Plan, there is no requirement for stormwater detention for this development which includes Tower 2. The proposed Tower 2 buildings will have an equivalent impervious area to the existing site and therefore the amount of runoff generated will remain unchanged. As such the pre-development and post-development peak flows for the plaza area would be the same and hence stormwater detention is not required.

Similarly, Mott Macdonald has identified there is no requirement for stormwater quality treatment for Tower 2. Stormwater collected from this development is from building roofs and will generally be clean water. Mott Macdonald has determined there are no water quality targets that are required to be met before discharging into the Council's stormwater network. Stormwater will connect to existing Council drainage network before discharging to the River Torrens.

Mott Macdonald's Stormwater Management Plan will appropriately manage the discharge of water and connect into existing infrastructure within Festival Plaza to satisfy PO 42.2 and 42.3 of the Design in Urban Areas module.

The finished floor level to the eastern half of Tower 2 closest to King William Road will be located greater than 300mm above the top of kerb and will therefore minimise risk of entry to potential flood waters, as sought by PO 1.1 of the Hazards (Flooding – Evidence Required) Overlay. Retail tenancies located beneath the elevated public plaza may not achieve this finished floor level but will be reviewed at the detailed design stage of the project to implement appropriate flood mitigation measures (if required).

6.10. Aviation Assessment

Thompson GCS has prepared an Aviation Assessment Report (refer to **Appendix 8**) considering the proposed development height and building methodology to determine if the proposal will impact the safety and efficiency of air transportation operations.

The Aviation Assessment Report identifies the following prescribed airspace heights above the building footprint:

- Obstacle Limitation Surface (OLS) 112m AHD;
- Procedures for Air Navigation Services Aircraft Operations (PANS-OPS) 184.7m AHD and increasing to 199.3m AHD at the north-east corner of the building (this was further reviewed from engagement with Airservices' Procedure Design Unit to accurately determine the PANS-OPS); and
- Radar Terrain Clearance Chart (RTCC) 243.8m AHD.

The proposed building has a maximum building height of 196.95m AHD and will exceed the OLS.

Walker proposes to use two (2) hammerhead cranes to undertake construction of the building, reaching a maximum height of 220.6m AHD. Subject to approval, both cranes will penetrate the PANS-OPS surface for three (3) months (the maximum allowable period of approval for PAN-OPS encroachment). The cranes will be required once construction commences at level 35 of the tower, cranes will then be increased to their maximum heights to complete levels 35 to 37. Works to be undertaken while cranes penetrate in the PANS-OPS surface include: removal of safety screens, completion of roof steelwork, façade completion and loading roof plant. To achieve work within this three (3) month period cranes will be operated by two (2) shifts each day from 6am to 10:30pm. Once the upper levels are completed Crane #1 will dismantle Crane #2, and Crane #1 will then be lowered to

below PANS-OPS surface and disassembled by a mobile crane. The mobile crane will not operate above 100m AHD (and not penetrate the OLS).

The impact of the proposed building and cranes penetrating the OLS and lowest PANS-OPS surfaces are referenced in **Figure 6-22**.

Overall, the proposed impacts can be summarised as:

- The building will penetrate the OLS by 70.8m, whilst the cranes will penetrate the OLS by 98.6m (Crane #1) and 83.6m (Crane #2).
- The building is located 1.9m below the PANS-OPS.
- The cranes will temporarily (up to 3 months) penetrate the PANS-OPS by 25.9m and 10.9m.
- The RTCC will never be penetrated by the proposed development or cranes.

Table 7: Impact of Building and Cranes on OLS and Lowest PANS-OPS Surfaces

	Operating Height	Max. Height	Impact on Adelaide Prescribed Airspace
Building		197.0m AHD	Penetrate OLS by 85.0m 2.3m below PANS-OPS 46.8m below RTCC
TC1	180.6m AHD	220.6m AHD	Penetrate OLS by 108.6m Penetrate PANS-OPS by 21.3m 23.2m below RTCC
TC2	165.6m AHD	210.6m AHD	Penetrate OLS by 98.6m Penetrate PANS-OPS by 11.3m 33.2m below RTCC

Figure 6-22 Impact of Building and Cranes on OLS & Lowest PANS-OPS Surface (Source: Thompson GCS)

Instrument flight procedures impacted have been identified by Thompson GCS and are summarised below in **Figure 6-23**. Three (3) instrument flight procedures will be impacted by the crane penetration of the PANS-OPS surface to a maximum height of 210.6m AHD. Mitigation measures incorporated into these instrument flight procedures will not materially impact the safety and efficacy of air transport operations.

The building and cranes will not significantly impact Visual Flight Rules ('VFR') operations over the CBD or transiting Adelaide airspace. Instrument Flight Rules and VFR operations at Parafield Airport are not impacted.

Table 8: Procedures Impacting Crane Penetration of PANS-OPS Surface

Procedure	PANS-OPS Height	Notes
Circling C/D	184.7m (606ft) AHD	Need to increase minima by 118ft (35.9m) to accommodate crane penetration of PANS-OPS surface at 220.6m AHD. Procedure seldom used by jet air transport operations
SID Rwy 05 West	197.5m (634ft) AHD (DEP West)-4.4% from DER. Increases over site from 648ft to 654ft (flat surface).	Able to make modest increase to climb gradient (5%) for crane penetration of PANS-OPS. SID Rwy 05 East has 5.5% climb gradient to achieve 260m PANS-OPS surface
ILS Rwy 23	Outside of splay area (using OAS)	Does not impact development site
VOR 23	199.3m (654ft) flat surface	Non-core aid mainly used by training aircraft. Able to increase minima without impacting air transport operations
APV 23	FAS above 197.5m AHD	Need to increase minima by 10m (33ft) (AAL 210m AHD). Minimal impact from PANS-OPS penetration
RNP Approaches	All above 197.5m AHD	No impact from PANS-OPS penetration (AAL all above 240m)

Figure 6-23 Procedures Impacting Crane Penetration of PANS-OPS Surface (Source: Thompson GCS)

Overall Thompson GCS' assessment determined that a temporary increase in the height of the PANS-OPS surface (i.e. to accommodate the crane height) can be achieved without impacting the safety and efficiency of air transport operations.

The proposed development has sufficiently demonstrated that it will not pose a hazard to Adelaide's air transport operations and satisfies PO 1.1 of the Airport Building Heights (Regulated) Overlay.

7. CONCLUSION

This development application seeks Planning Consent to construct a 38 storey mixed use building comprising 'office', 'shop', 'civic space and office', 'hotel' uses and an elevated public plaza, nomination of three (3) signage zones with ancillary landscaping and solar photovoltaic panels (roof mounted) and associated alterations to basement and public plaza located at Festival Plaza, Adelaide.

Following an inspection of the subject site and locality, a review of the proposed plans and associated specialist reports accompanying the application and a detailed assessment of the proposed development against the relevant provisions of the Planning and Design Code, we have formed the opinion that the proposed development represents appropriate and orderly development which accords with the relevant provisions of the Code for the reasons summarised below:

- The proposed development incorporates suitable and complementary land uses that support Festival Plaza and the Riverbank precinct through activation of the public realm with an increase in patronage and the creation of a unique State significant destinations. Additionally, the direct connection to Festival Plaza connects the development to the public realm and flows onto the Adelaide Park Lands to the north and North Terrace to the south.
- Tower 2 has an exemplary and high quality design that positively responds to the local context and achieves the desired outcomes of the Zone through appropriate siting, scale and architectural expression of the building as evident in the Architectural Plans and detailed Architectural Design Report. The building will achieve verified high performance initiatives as outlined by D Squared's assessment to provide an appropriate sustainability strategy for a building of this scale.
- CPTED considerations have been factored in as part of the design providing active uses and frontages at ground level and level 01 and creating a welcoming built form environment.
- Hosking Willis has undertaken a comprehensive heritage assessment, to demonstrate that the development will not diminish the heritage values of the adjacent State Heritage Places and impacts on views to Parliament House from the north have been minimised. The development satisfies the relevant provisions of the State Heritage Place Overlay, Heritage Adjacency Overlay and Entertainment Subzone listed in the table above with the retention of important views of State Heritage Places.
- The landscape design is carefully designed to complement the existing Festival Plaza and built form. The public realm works associated with Tower 2 provide an elevated public plaza introducing new opportunities for patrons to visit Festival Plaza and use this new public space. The elevated public plaza allows for improved views of Parliament House, additional seating areas and public artwork. The elevated public plaza assists with the creation and forming of public laneways. Overall the public realm and landscape work will increase pedestrian activity at Festival Plaza.
- On review of MEL's wind study assessment, the proposal demonstrates that the development site and surrounding areas will not be unreasonably impacted by wind conditions following construction of Tower 2. Further mitigation measures will be reviewed by the applicant and project team as part of the detail design stage of the project to further improve wind conditions where possible.
- Thompson GCS' assessment determined that a temporary increase in the height of the PANS-OPS surface (i.e. to accommodate the crane height) can be achieved without impacting the safety and efficiency of air transport operations.

- The loading and waste management will be appropriately accommodated in the existing loading docks with the new refuse store room and WGA's loading dock recommendations to be implemented to ensure both Tower 2 and Festival Tower will be adequately serviced.
- Tower 2 provides adequate on-site bicycle parking spaces for the proposed land uses, factoring in the high quality end of trip facilities provided and the close proximity to high frequency public transport opportunities.
- Stormwater management proposed new infrastructure and will connect into existing infrastructure implemented as part of Festival Plaza and Festival Tower works.