

File No:
2025/06279/01

5 March 2026

Ref No:
24358371

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For the attention of the State Commission Assessment Panel

254-260 Franklin Street Adelaide

The following advice is in relation to the referral for application 26000407. In my capacity as a referral body for advice, I would like to offer the following comments for your consideration. The proposal was presented to the State Design Review panel on one occasion. The following advice has been informed by the panel's recommendations.

The proposal is for a 13 storey (45.6 metre tall) mixed use residential development, comprising 95 apartments (including up to 36 affordable housing dwellings), ground floor retail and podium car parking.

I am pleased to provide my support for the application, including the aspiration to provide a high-quality residential proposal in this location. However, in my view, the proposal could be further strengthened through refinement of the built form composition and facade detailing and a clear commitment to maintaining the proposed sustainability outcomes.

Site Context

The 1,328 square metre site is located towards the western end of Franklin Street on the west corner of Gray Street. The site is rectangular in plan, amalgamating three allotments, with an approximately 24 metre wide frontage to Franklin Street and 54 metre wide frontage to Gray Street. The existing site comprises at-grade car parking to the northern half of the site, with the southern portion previously containing three attached single storey stone cottages, which have been demolished.

Franklin Street is identified as a 'City Street' in the Adelaide Design Manual, with a high volume of pedestrian, bike, vehicle, and servicing activity, along with parking spaces to support business and retail activity. Gray Street is identified as a 'Small Street', adding to the city's detail and interest and fine-grained network, and provides a north-south linkage through the city, extending between Grote Street and North Terrace.

Adjacent the site to the west at 262-280 Franklin Street is a two storey commercial building owned by the Greek Orthodox Community of South Australia. This site includes a two-way laneway that extends along the north boundary of the subject site. To the north of the laneway is a collection of three storey townhouses in four clusters with an internalised laneway network accessed from Spencer Street. To the east of Gray Street (242-248 Franklin Street) is a five storey mixed use residential building.

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Notable heritage places in the locality include the State Heritage listed Greek Orthodox Church & Bell Tower (282 – 288 Franklin Street) further west of the site and St Mary's Dominican Convent (273 Franklin Street) to the south of the site across Franklin Street. The existing built form context of the locality is diverse, comprising low to mid-scale forms with a mix of commercial, residential, educational and civic uses ranging between one and five storeys. Larger developments of up to 17 storeys are also located within the wider locality on Franklin, Gray and Waymouth Streets.

The site is located within the Capital City Zone where a maximum building height of 53 metres is envisaged and is subject to a Land Management Agreement to provide affordable housing.

Built Form and Height

The building footprint extends to all site boundaries, with ground floor recesses provided for pedestrian entry on Franklin Street and vehicular access centrally along the Gray Street frontage via an existing crossover. The building comprises a three storey podium element with a tower above.

The tower presents a zero setback along the eastern portion of the Franklin Street boundary, with a minor setback of approximately 0.5 metres provided to the western portion of this frontage. Along the remaining boundaries, tower glazing lines are generally setback; however, the effectiveness of these setbacks is reduced where balconies project forward, framed by expressed structural elements. This condition is most evident along the Gray Street frontage and the northern elevation, where expressed structure varies between zero and approximately 1.1 metres from the boundary. Along the western boundary, the glazing line is setback by approximately five metres, reducing to an effective setback of approximately 2.5 metres where balconies project.

I support the design approach for a podium built form that provides a human scale street interface, responds to the generally low scale of nearby built form and screens the above-ground car parking. I also acknowledge the introduction of a more solid corner condition, replacing previously glazed areas, which enhances the sense of a grounded podium. However, in my view, opportunities remain to improve the legibility of the podium through more defined tower setbacks and a clearer relationship to the tower built form.

I also support the proposed height of approximately 46 metres at this location and acknowledge the rationale for remaining below the envisaged maximum height to balance apartment yield and car parking provision. Additionally, I support the generous ground floor height of approximately four metres, enabling retail operation and private waste collection within the site.

I acknowledge the reconfiguration of balconies to the north-facing apartments in response to Design Review Panel recommendations resulting in improved apartment outlook, amenity and shading. I recommend consideration of additional shading measures to the north, noting the extended structural grid provides opportunities for fixed horizontal shading where balconies do not project.

The adjoining site to the west is a potential redevelopment site. While I acknowledge the proposed setbacks, the project team should be aware that a future adjoining development adopting similar setbacks may result in compromised outlook, and access to daylight/sunlight, and may wish to consider strategies to futureproof this interface through modifying orientation and/or increasing the setback of balconies facing west.

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Architectural Expression and Materiality

The three storey podium is defined by light coloured masonry walls that enclose the car park levels incorporating hit-miss brickwork, punctuated openings, black planter boxes and louvres, an expression that is distinct from the tower above. At ground level, the southeast corner of the podium typically comprises full height glazing framed by masonry elements extending to ground. The pedestrian entry is defined above by vertically expressed black battens. At the northeast portion of the podium, a green wall and fixed seating are proposed adjacent the recessed vehicle entry.

The north and west podium facades (boundary walls) are a combination of 'feature brick patterned' and 'feature vertical line patterned' precast concrete panels, with feature masonry facades turning the northeast and southwest corners.

The tower element reflects a contrasting expression and colour, comprising an orthogonal grid with expressed slab edges emphasising every second floor. The structural columns extend through the podium element to ground on the northern portion of the Gray Street facade.

The east and west elevations are characterised by projecting balconies grouped into three vertical framed elements, creating a three-dimensional gridded expression. Services plant is located on the rooftop within screened enclosures.

I support the following aspects of the architectural expression:

- simplicity of the tower expression that presents in-the-round, and the rational architectural expression overall
- visual permeability and a sense of address at ground level
- restrained material palette and contribution to the streetscape through a human scale and varied textural expression including the introduction of hit-miss brickwork supporting natural ventilation to the carparking levels.

In relation to the tower expression, I recognise the potential of the proposed design approach of a consistent grid structure paired with infill elements to achieve a refined and clearly articulated outcome. However, the painted concrete columns and flat precast concrete infill treatment do not yet fully realise this ambition. In addition, the strong tonal contrast introduces a degree of visual weight to the upper levels which risks diminishing the clarity of the overall composition. I recommend further resolution of the grid and infill expression commensurate with the quality indicated in the precedent imagery.

I do not support the use of painted concrete for projects of the proposed scale, in relation to design detail, construction quality, and durability and maintenance considerations, as this finish is unlikely to retain a high-quality appearance over time.

To ensure delivery of a high-quality outcome and development of a more cohesive expression, I recommend consideration of the following:

- establishment of a stronger relationship between the podium and tower by integrating the upper-level framed structure with the podium through a cohesive material strategy and architectural expression, that may improve the overall architectural composition
- development of a finer, more slender expression and detailing in close collaboration with the structural engineer to ensure alignment between structural systems, construction methodology, architectural intent and materiality
- refinement of the material selections to prioritise high-quality, durable finishes that will achieve a more resolved and enduring outcome, contributing positively to the urban streetscape.

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Ground Plane, Access Strategy and Public Realm

Pedestrian access to the residential lobby is located at the southwest corner of the site from Franklin Street via an external recessed area that also includes the fire egress adjacent the residential letterboxes. Entry to the retail tenancy is proposed through multiple entry points on both street frontages.

Vehicular access (residents, visitors, loading and waste collection) is proposed from the Gray Street frontage via a retained two-way crossover. A total of 67 car parking spaces (including two accessible parking spaces) are proposed over three levels (ground, first and second floors).

Within the vehicular entry recess (at the streetscape, outside of the secure line), visitor bicycle parking areas are proposed on each side of the vehicle entry door. An additional secure bicycle parking area is proposed within an enclosure between services rooms on the ground floor for a total of 35 spaces. It is also anticipated that bicycles will also be stored securely within dwellings. I support the provision of external visitor bicycle parking; however, I am concerned about its proposed location, which is close to the vehicle movement area (raising safety concerns), and relatively distant from the pedestrian entrance on Franklin Street, which visitors are likely to use. I recommend review of alternative locations to ensure both safety and convenient access for all users.

The proposal includes a continuous canopy over the footpath to the east end of the Franklin Street frontage (two metres deep) and along Gray Street. The depth of the Gray Street canopy varies from approximately 0.6 to 1.5 metres due to the narrowness of the existing footpath. The proposal seeks to retain all existing street trees and on-street parking spaces on Franklin and Gray Streets.

I support the site configuration with a recessed residential entry and proposed active retail use to the corner of Franklin and Gray Streets with projecting canopies above. I acknowledge the rationale to locate services to the rear of the site, utilising an existing crossover on Gray Street for vehicle access. While the services and vehicle entry occupy a significant proportion of the Gray Street frontage, the impact of these elements are mitigated through the inclusion of landscaping and seating, which help to enhance the pedestrian environment and streetscape. I recommend ongoing review of opportunities to further activate the Gray Street frontage through an additional tenancy or reconfigured resident bicycle store.

Internal Planning and Residential Amenity

I strongly support the provision of affordable housing (36 dwellings/38 percent), and the mix of studio, one, two and three bedroom apartments, with the blend of typologies across floor levels that supports diversity including the intent to distribute affordable housing throughout the building.

I also support the provision of windows to lift lobbies across all levels and the configuration of linear balconies with integrated landscaped planters that are of a sufficient depth to support functional use. Additionally, I commend consideration given to future adaptation of the car park levels, including providing adequate floor-to-floor heights.

I recommend consideration of opportunities to further enhance resident amenity through the review of internal planning and landscape strategies, including the provision of additional communal spaces, such as habitable rooftop spaces, terraces, and garden areas to encourage social interaction and mitigate heat island effects.

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Environmentally Sustainable Design (ESD)

I support the proposed ESD commitments, and recommend they are maintained throughout all stages of the project and encourage opportunities to extend these commitments to demonstrate leadership in the sector.

I also recommend consideration of integrated, flexible shading strategies for the east and west facing balconies to manage solar heat gain within apartments. The grid-based facade structure appears suited to accommodating external shading devices.

Summary

To support delivery of the project ambition and to ensure the most successful design outcome is achieved, the State Commission Assessment Panel may consider conditions or reserve matters to address the following elements of the proposal:

- provision of integrated external solar shading to the north, east and west facades
- further resolution of bicycle parking locations:
 - to ensure ease of access and safety (visitor spaces)
 - to provide additional activation to the Gray Street frontage (resident bicycle store)
- final external material selections, with consideration given to high-quality integral finishes supported by the provision of physical samples
- additional information to ensure delivery of the landscape outcome as presented
- recommendations as detailed in the Principal's Project Requirements - ESD, dated 5 December 2025 prepared by Living Building Solutions, to be fully incorporated into the development.

I trust the above comments assist with making your assessment.

Yours sincerely



Simon McPherson
State Design Review Chair
Delegate of the Government Architect

cc	Damien Heffernan	ODASA	damien.heffernan2@sa.gov.au
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Reid, Joanne (DHUD)

From: Heffernan, Damien (DHUD)
Sent: Friday, 22 May 2026 11:06 AM
To: Reid, Joanne (DHUD)
Cc: Newland, Sophie (DHUD)
Subject: RE: DA 26000407 - 143-151 Gray St and 254-258 Franklin St Adelaide

OFFICIAL

Dear Joanne,

I have reviewed the documentation provided on 6 May 2026 in response to the post-referral Request for Information issued to the applicant by Commission Assessment.

The following comments are to be read in conjunction with the original referral letter dated 5 March 2026.

I acknowledge the applicant's response and the additional material provided in support of the application. In my view, the response demonstrates a genuine effort to address key design matters previously raised through Design Review and the referral advice. I am pleased to provide my continued support for the application.

Shading Strategies

I support the introduction of additional external shading measures to the north, east and west elevations, including fixed horizontal shading devices to exposed window openings, which positively respond to the recommendations regarding solar heat gain and residential amenity. I also acknowledge the potential shading benefit provided by projecting balconies above east and west facing balcony areas. However, noting the low-angle summer sun, I continue to recommend consideration of integrated, flexible, vertical shading devices to balcony edges, particularly those facing west.

In relation to windows on the east and west elevations, I recommend further consideration of solar protection strategies, noting that horizontal shading devices alone may have some limitations in responding to low-angle sun.

Architectural Expression and Materiality

I support the move away from painted concrete finishes toward stained concrete for improved durability and reduced long-term maintenance requirements. I also acknowledge the intent to strengthen the relationship between the podium and tower through revised material and tonal cues.

However, in my view, the revised tower composition warrants further consideration. The detailing of the structural grid elements, and the relationship between the light-toned elements and darker green framing/infill, do not yet achieve the clarity and refinement suggested by the precedent imagery. The composition risks reading as visually heavy rather than slender, and fragmented rather than cohesive, noting that the expressed grid is set on-boundary at both street frontages.

I therefore continue to recommend further refinement of the tower composition, including the tonal relationship between facade elements, and the hierarchy, ordering and detailing of the expressed grid and infill panels, to achieve a finer, more slender expression and ensure the built outcome reads as a cohesive, legible and refined architectural composition.

Western Interface

In relation to the western interface, I refer to the original referral advice and continue to recommend consideration of potential interface outcomes, including future access to daylight, outlook and visual privacy should the adjoining site be redeveloped, to protect the amenity of the residents of this proposal.

Bicycle Parking

I acknowledge the revised bicycle parking arrangement, including improved direct access to the resident bicycle store and the addition of four visitor bicycle parking spaces at the primary residential entry.

However, the majority of visitor bicycle parking remains located adjacent the vehicle entrance. In addition, the northern visitor bicycle parking area appears constrained, with potential conflicts between doors, parked bicycles and pedestrian movement.

I therefore continue to recommend consideration of opportunities to locate additional visitor bicycle parking closer to the primary residential entry, where it is likely to be more convenient, legible and safely accessed by visitors.

Gray Street Activation, Communal Space and Integrated Landscaping

I acknowledge the integration of communal space and landscape within the development, contributing positively to resident amenity and the public realm.

While I acknowledge the current prevailing conditions on Gray Street, I am of the view that any new development should maximise activation and minimise inactive frontages to all streets where possible. As the revised resident bicycle store arrangement now occupies part of the Gray Street frontage, I recommend further consideration of whether this interface could contribute more positively to street activation, legibility and passive surveillance, consistent with the intent of the original referral advice, such as through a glazed or screened wall to the street interface.

This should be carefully balanced with the proposed landscape strategy, noting that any increased visibility or activation of the bicycle store may require modification to the green wall and associated landscape treatment. Further detailed resolution of this interface would help ensure the Gray Street frontage achieves a high-quality pedestrian experience, while maintaining the amenity and public realm benefits of the proposed landscaping.

Affordable Housing

I note the revised proposal reduces the provision of affordable housing from 36 dwellings to 15 dwellings. The previous provision of 36 affordable dwellings was strongly supported in the original referral advice as a positive contribution to housing diversity and affordability in the city.

While the significant reduction is regrettable, I continue to support the inclusion of affordable housing within the proposal.

Summary

Overall, I remain supportive of the proposal and acknowledge the genuine attempt to address matters previously raised. Notwithstanding this, and noting these comments should be read in conjunction with the referral letter dated 5 March 2026, I consider further resolution remains warranted in relation to:

- integrated external solar shading, particularly to east and west facing glazing and balcony edges
- further refinement of the tower composition, including the hierarchy, design and detailing of the expressed grid and infill panels, and material/tonal relationship between facade elements
- final external material selections supported by physical samples
- visitor bicycle parking locations to improve convenience, legibility and safety
- detailed design resolution of the Gray Street public realm interface, including the resident bicycle store, landscape treatment and opportunities for activation/passive surveillance
- detailed resolution of integrated landscaping and facade planting.

Damien Heffernan
on behalf of Simon McPherson
State Design Review Chair
Delegate of the Government Architect