

APPENDIX 9. DESIGN REVIEW PANEL RESPONSE LETTER

File No:
2025/08574/01

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24492138

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Dear Mr Dreosti

Thank you for consulting the Office for Design and Architecture SA (ODASA) in relation to this proposal which was presented at its second Design Review session on 26 March 2026. As Chair of the panel, my recommendations, informed by the panel, are set out below. This letter supersedes all view that may have been expressed previously.

195 North Terrace, Adelaide

The proposal is for a 40 storey tall Purpose-Built Student Accommodation (PBSA) development with an overall height of 135.5 metres, comprising 612 apartments with 635 beds (96 percent single-occupancy studios including accessible units, and four percent twin shares), multi-level communal amenities, and retail tenancies.

I acknowledge and support the project team's ongoing and constructive engagement with the Design Review process including the genuine response to recommendations in the first Design Review session, particularly in relation to the built form composition, simplification of the architectural expression, and the reworking of the ground plane to increase activation and openness.

Notwithstanding, the site's prominent North Terrace and Gawler Place address, its historic streetscape context and the scale of the proposed development collectively establish a responsibility to deliver an exemplary architectural and public realm outcome. In its current form, in my view the proposal does not yet meet this expectation and requires substantive further design resolution to fully realise this ambition. Key interrelated matters include contextual responsiveness, public realm and cityscape contribution, architectural expression, sustainability performance and residential amenity.

Site Context

The site is located on the southern side of North Terrace, with frontages to North Terrace (north, 18.75 metres), Gawler Place (west, 30.5 metres) and The Angels Lane (south, 18.75 metres). Rectangular in plan, it covers 572 square metres and is currently occupied by a 12 storey mixed-use retail and commercial building, proposed for demolition. This building features a predominantly glazed ground floor level beneath a red brick facade with cream-coloured grid frames to the north and west elevations, and modular and modelled window reveals providing articulation and depth. A partial basement and electrical infrastructure servicing the precinct from The Angels Lane are also present.

North Terrace is Adelaide's premier cultural and historic boulevard, running east-west along the northern edge of the city centre. It features major State Heritage listed institutions including Government House, the State Library of South Australia, the South

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Australian Museum, the Art Gallery of South Australia and the Adelaide University campus on the northern side of North Terrace. The National War Memorial sits diagonally on the northwest corner of the intersection.

This portion of North Terrace contains a number of State Heritage Places (SHPs) and Local Heritage Places (LHPs) on the southern side including:

East of the site:

- 'Tobin House' – 196 North Terrace immediate adjacent the subject site (LHP)
 - o seven storey residential (student accommodation) building with additional two levels of setback private residential apartments above the LHP
- Former 'G&R Wills Warehouse' – 203-207 North Terrace (SHP)

West of the site:

- 'Gawler Chambers' – 188 North Terrace across Gawler Place (SHP)
 - o five storey 1914 red brick building with cream horizontal banding, symmetrical design, central Tudor-style castellated parapet and four balconies on the two upper levels
 - o currently vacant; a 2012 development approval for adaptive reuse of the SHP and a 15 storey office building behind has expired
- 'Queen Adelaide Club' – 182-184 North Terrace (LHP)
- Myer Centre (former Verco Building) – 178 North Terrace (SHP).

To the south of the subject site, across The Angels Lane, is the five storey red brick 'Galleries' building which extends retail activation along Gawler Place toward Rundle Mall. A 2017 development approval for the Galleries site to facilitate a 19 storey (85 metre) mixed-use commercial (office) building connecting through to North Terrace and Fisher Place, incorporating the adaptive reuse of the former G&R Wills Warehouse, has lapsed. In March 2026, a public announcement was made to develop the 200 North Terrace site, comprising three towers, including a student accommodation building positioned to the rear/south of The Angels Lane. I strongly encourage the project team to engage with the developer to identify mutually beneficial outcomes, particularly in relation to basement levels, servicing and interface conditions.

Adelaide's CBD particularly along North Terrace is rapidly evolving into a student living precinct, supported by rising enrolments and the merged universities. Several PBSA developments have been approved or constructed in the past 12 years.

The site is within the Planning and Design Code's Capital City Zone, which promotes high-quality, dense, mixed-use development that activates the street frontage. No height limits apply.

Context and Design Drivers

The proposal introduces a tall student accommodation building on a prominent corner within a heritage rich and civically significant precinct. Due to its significant urban location, development of the site carries a high degree of civic responsibility and heightened expectations in relation to public realm contribution, architectural quality and contextual response. The adjacency to heritage places and established material context reinforce the importance of careful scale, proportion and material relationships. The corner condition presents an opportunity to 'hold' and anchor the intersection, create a meaningful dialogue with and positively contribute to the civic character and streetscape pattern of North Terrace.

While I acknowledge the design team's exploration of the podium as a defining element that anchors the intersection, in my view, the approach to 'recreate' the existing corner building as the podium does not fully realise the potential of this condition. I recommend

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holistic review of the conceptual approach, with the view to fulfill the building's role as a bookend element, its responsibility in addressing a major civic corner and the clarity of its architectural character, including the articulation and expression of its use.

To strengthen the development's contextual response, I recommend the following:

- clear articulation of the site-specific design drivers and principles that respond specifically to the site's civic role and prominence
- additional streetscape analysis, including long-range views and street elevations, to demonstrate a considered response to the broader urban fabric, including heritage buildings and the National War Memorial along North Terrace
- continued development of the base as a distinct building element.

Height and Built Form Composition

The built form comprises a podium and tower composition. The nine storey podium, with an approximate height of 35 metres, extends to the site boundaries. Above the podium, level 9 is proposed as a transitional level, articulated through a setback facade line and open terrace, creating a clear break in the overall built form. The tower element extends to all site boundaries and comprises 30 levels of apartments and communal spaces.

I support the revised design approach for increasing the podium height and creating a defined podium and singular tower composition following the first Design Review session, as in my view this reduces compositional complexity, strengthens the corner condition and improves the relationship of the built form to adjacent buildings.

Architectural Expression

The design intent is for the podium to form a substantial base that grounds the building, expressed through a grid composition of thick vertical light-coloured brickwork bands infilled by champagne-coloured aluminium window shrouds and secondary horizontal brickwork bands. Within the grid, levels one to three comprise full height clear glazing, while levels four to eight incorporate a mix of clear glazing, awning windows and areas of non-vision/shadow box elements. The ground floor is intended to present as an elevated and visually permeable interface to the street, articulated through full height glazing and black aluminium cladding with vertical expression. Black aluminium-clad canopies are proposed to the north and west elevations.

The tower is proposed as a building in the round, expressed as a simple glass box through curtain wall and shadowbox detailing, with the intent to establish a recessive tower form that contrasts with the more articulated and detailed podium. The east elevation includes a centralised vertical band of glazed louvres to screen mechanical plant.

I acknowledge the significant amendments to the design approach to the podium and tower architectural expressions. While I consider the revised approach for a simpler expression positive, I am concerned by the overall proposition, which appears highly commercial and does not reflect the development's role and characterisation as a place for student living. I am also concerned that the impact of internal programming, including wall and window placement, is not yet adequately considered in the facade design or supporting visualisations.

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In relation to the podium, I recommend further review of the broader North Terrace context and introduce more characterful, expressive and potentially more playful architectural treatment that is not restricted by the reference to the existing building and better reflects the residential use.



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In relation to the tower, while I support the intent for a singular and legible expression, I recommend the following:

- overlay of internal layouts with facade studies to inform the facade composition and external expression
- exploration of the potential for a structural or ordering device to provide greater coherence and legibility to the tower composition.

I also recommend further review of the plant and services screening on the east elevation to resolve the balance between servicing and sustainability requirements and impact on the architectural expression and clarity of the concept for a building in the round.

Ground Plane and Public Realm

The proposal seeks to activate the street edges with a retail/cafe tenancy to North Terrace and student entry to Gawler Place. The reception and administration areas are also proposed along the Gawler Place frontage. Services including a transformer, fire booster, fire control room and waste room are proposed along The Angels Lane. The lift and stair core are positioned toward the eastern portion of the building, acknowledging the potential for future development along this boundary.

I support the amendments made since the first Design Review session to improve activation of the street edges, including the reconsideration of the previously proposed high-end retail use and increased focus on public access, permeability and connectivity.

To further strengthen the project's contribution to the public realm and reinforce civic generosity at this highly pedestrianised and prominent city corner, I recommend consideration of the following:

- relocation of waste, servicing, and back-of-house functions to a basement level to maximise ground level space for public use
- relocation of the bicycle store area and introduction of a more active use or publicly engaging use on level one to strengthen visual connection with the street at this prominent corner condition
- confirmation of strategies to manage stormwater levels within the site, and continued engagement with the City of Adelaide to ensure a permeable, integrated, accessible and universally inclusive ground plane outcome.

Amenity and Layouts

I support the side core configuration, the provision of natural light and ventilation to the common corridors and the interconnectivity between the upper communal levels. However, I note that student room sizes are relatively compact and the proportion of communal facilities to student rooms has been reduced. I recommend confirmation that the proposal affords sufficient residential amenity and meets the minimum policy requirements in this regard.

In my view, there are opportunities to improve the amenity of student rooms, communal spaces and facilities, including consideration of the following:

- provision of smaller, quieter communal spaces distributed across all levels to complement larger shared areas and offer a greater diversity of use
- exploration of varied room typologies within the podium to introduce diversity in accommodation and contribute to facade articulation
- ensuring adequate bathroom provision to all communal facilities levels
- incorporation of soft landscaping and planters with strong visual and physical connections to the level 9 terrace space, to enhance resident amenity and the overall student experience

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- continued refinement of internal-external relationships, including the size, configuration and usability of terraces, and increased greening to maximise amenity, northern outlook and solar access.

Environmentally Sustainable Design (ESD)

I recommend greater clarity regarding the project's ESD commitments and further exploration of opportunities relating to passive design, building performance, occupant comfort, material selection and landscaping that are integrated with the architectural proposition. I also recommend the establishment of clear project sustainability targets, informed by a sustainability consultant, to ensure ESD initiatives are embedded across all aspects of the development. In particular, I encourage a strong focus on building performance, with regard to occupant comfort and wellbeing. In my view, a student accommodation development presents a valuable opportunity for residents to actively engage with sustainability. As such, I encourage ongoing consideration of strategies that allow ESD initiatives to be visibly demonstrated and meaningfully experienced throughout the project.

I acknowledge the low provision of bike parking within the development in recognition of the site's central location with good walking and public transport access, however, I recommend further review of the space allocation and location as noted above.

I also acknowledge the provision of three waste chutes and recommend consideration of waste rooms per level to facilitate convenient disposal of bulky items and packaging.

Summary

I thank the proponent team for engaging in the Design Review process and strongly encourage exploration of the issues and opportunities outlined in this letter. In my view, the proposal is yet to meet the expectations associated with this significant urban location and would benefit from continued participation in Design Review to support the delivery of a high quality architectural outcome.

Yours sincerely



Kirsteen Mackay
Government Architect

cc

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