

**Enquiries:** Helen Dand - 8203 7728  
**DA reference:** 26019328



2 July 2026

State Commission Assessment Panel  
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**Kaurna Country**  
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Dear Sir/Madam

**Application:** 26019328  
**Applicant:** Mandala M1 Centre Pty Ltd  
**Addresses:** 195 North Terrace, Adelaide SA 5000  
**Description:** Construction of a 40 storey student accommodation building with ancillary shop on ground floor including verandah and roof-mounted solar photovoltaic panels

I write in reference to the abovementioned Development Application and the referral undertaken to Council's Chief Executive Officer pursuant to Regulation 23(2)(b) of the *Planning, Development & Infrastructure (General) Regulations 2017*.

In accordance with Regulation 23(3), comments can be provided with respect to the following matters:

- Essential infrastructure
- Traffic
- Waste management
- Stormwater
- Public open space
- Other public assets and infrastructure
- The impact on any local heritage place.

Accordingly, the purpose of this referral is to provide comment regarding technical matters outlined above only and not to confirm support or otherwise for the application. Matters relevant to this application are addressed below.

#### **LOCAL HERITAGE**

- The proposed development is located adjacent Tobin House which is listed as a Local Heritage Place.
- The massing and materiality of the proposed development effectively matches the existing building, albeit with a visually well separated tower above.

#### **PUBLIC REALM & INFRASTRUCTURE**

- There are CPTED concerns with the proposed entry doors stacking between columns as this incorporates recesses and concealed areas.
- Will the doors on the ground floor be in line with the adjacent building wall when closed?
- The proposal indicates outdoor dining in the public realm. Any structures shown on the footpath are not approved and should be removed from the plans. Approval for outdoor dining needs to be approved separately by Council.

The City of Adelaide acknowledges the Kaurna People as the Traditional Owners of the Country where the city of Adelaide is situated, and pays its respects to Elders past, present and emerging.



- Further information is required to demonstrate the canopies are suitably setback from all public infrastructure, North Terrace and Gawler Place in accordance with Council's Encroachment Policy.
- Under canopy lighting will be required to Category PA2-AS1158 standard.
- Any works in the public realm require future approval from Council.
- The developer is responsible for all costs associated with public realm impacts.

## TRAFFIC & ACCESS

### Bicycle Parking

- The proposal has a shortfall of 232 bicycle spaces. The 'similar sites' justification in the Transport Impact Assessment is not supported.
- Access to the bicycle store via the ramp and lift to the Level 1 store, should be reviewed to confirm safe and convenient access for residents without conflict with other ground floor uses.

### Waste and Servicing

- The proposal does not satisfy Transport Access and Parking PO 1.4 as suitable on-site loading and servicing facilities, including for commercial waste collection, residential deliveries and removalists has not been provided.
- Suitable on-site loading facilities should be provided, particularly considering the scale of the development.
- The trip generation has not been adequately included or addressed.
- The turn path of the 10.2 metre truck and frequency of this movement is concerning, particularly for the safety of pedestrians. Review of the Traffic Impact Statement for works undertaken to The Angels Lane and Gawler Place in 2019/2020 indicates The Angels Lane was designed for 5.2 metre passenger vehicles and check vehicle 8.8 metres (which still needed to turn left out and complete a 3-point turn).
- There are concerns regarding constructability of the development. Allowing a lane closure along North Terrace for an extended period close to the intersection will significantly impact the efficiency and capacity of the intersection as well as a significant amount of infrastructure (including the traffic signals control box). It is acknowledged there was a lane closure to facilitate a previous development at 203 North Terrace, however the footpath at that location was wider and further from the intersection.
- An update to the Transport Impact Assessment is required and should include the potential trip generation for the development using the NSW Guide to Transport Impact Assessment version 1.1 2024 ('NSW Guidelines') or equivalent trip generation studies to quantify the potential impact on the operation and safety of Gawler Place and the traffic signals at the intersection of North Terrace, Kintore Avenue and Gawler Place.
  - a. For example, according to the NSW Guidelines the potential trips generated from the development are in the order of 1,918 trips per day for 'boarding houses' which includes walking, users of personal mobility devices (PMD) such as cyclists and e-scooter users, public transport, taxi/rideshare and vehicle trips, plus "freight and servicing trips" (an estimated 204 additional trips) which might include waste collection(s), parcel delivery, food and supermarket deliveries.
  - b. If the PM peak for student accommodation (approximately 362 trips) coincides with existing peak pedestrian movements (785 pedestrians crossing North Terrace on the eastern side of Gawler Place from 12.15-1:15pm in a 2018 count), there will be a potential 30%+ increase in trips along the eastern side of Gawler Place.
  - c. An appropriate review needs to be undertaken to ensure there is sufficient capacity at the intersection of North Terrace, Kintore Avenue and Gawler Place and along Gawler Place for the increase in trips generated from all modes of transport to and from the development. This includes, but is not limited to, a parking turnover analysis of Gawler Place, turning count survey which includes pedestrians and PMD users, SIDRA intersection analyses and impacts on the level of service provided to pedestrians to minimise its potential impact on the functional performance of the transport system in accordance with Transport Access and Parking PO 1.1.



- d. Any changes to the intersection of North Terrace, Kintore Avenue and Gawler Place, as well as along Gawler Place shall be at the developer's expense.
- In 2019/2020, changes to The Angels Lane and Gawler Place were undertaken and designed for B85 vehicles and 8.8 metre rigid vehicles, noting the latter will need to turn left and undertake a 3-point turn before continuing north.
  - With low volumes at the time, this was considered acceptable subject to monitoring the median for potential damage and reducing the median should the need become apparent.
  - A higher frequency movement of a larger 10.2 metre truck is proposed which is considered unsafe due to the frequency of the movement and potential conflict with the volume of pedestrians along Gawler Place, both existing and the increase in pedestrians from the development.
  - While it is acknowledged 10.2 metre trucks might be fitted with cameras and sensors, these cannot be relied upon for pedestrian safety as not all vehicles are fitted with this technology and it cannot be guaranteed to be fully functioning at all times.
  - Consideration should be given to removing a portion of the median to facilitate a right turn out movement in a forward direction from The Angels Lane to minimise the number of conflict points between vehicles using The Angels Lane and other road users.
  - The above option could also provide improved compliance with Transport Access and Parking PO 1.4 and PO 11.2 as loading, unloading and turning of all traffic could avoid interrupting the operation of and queuing on public roads and pedestrian paths.
  - Additional information is required regarding the length of time a waste collection vehicle will block The Angels Lane. There are other properties with access to The Angels Lane. As it is a public road, numerous offences under the Australian Road Rules could be committed by stopping a vehicle for extended periods including unreasonably obstructing drivers or pedestrians (ARR 125) and obstructing access to and from a footpath, driveway etc (ARR 198).

#### **STORMWATER MANAGEMENT**

- Estimation of the predevelopment flow rate resulting from the 5% AEP (1 in 20-year ARI) rainfall event. This will be the maximum flow to be allowed out of the site when fully developed.
- Detention is required (against the 1% AEP (allowing 5% AEP predevelopment flow rate out)). Confirm location of the detention and discharge mechanism to the Council drainage system. The proposed detention is estimated on the 1% AEP predevelopment instead of the 5% AEP predevelopment.
- The estimation of the retention volume (WSUD) as per the State Government requirement (retention of stormwater to be used for toilet flushing and landscaping area irrigation) as retention is required.
- The finished floor level which is now at least 300mm above the top of the kerb is supported.
- A Site Management Plan should be prepared and provided to Council for consideration and approval prior to commencing any work on site.

#### **WASTE MANAGEMENT**

- There are no concerns from a waste management perspective, aside from any transport matters.

Please contact Helen Dand on 8203 7728 if you require any clarification.

Yours sincerely



Michael Sedgman  
Chief Executive Officer

