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For the attention of the State Commission Assessment Panel

195 North Terrace, Adelaide

The following advice is in relation to Development Application 26019328. 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 two occasions. The following advice has been informed by the panel's recommendations.

The proposal is for a 40 storey Purpose-Built Student Accommodation (PBSA) development with a height of 133.25 metres (excluding rooftop plant), 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 the project team's engagement with the Design Review process and the genuine response to recommendations in relation to the built form composition, refinement of the architectural expression, and the reconfiguration of the ground plane to increase activation and openness. I also acknowledge the applicant's written response to the advice provided at the second Design Review session.

Notwithstanding these positive amendments, the site's prominent North Terrace and Gawler Place address, its historic streetscape context and the scale of the proposed development establish a high expectation for architectural quality, civic contribution, contextual response and public realm performance. In my view, while the proposal has advanced through the Design Review process, further resolution of key design matters is required to fully realise this ambition. I therefore recommend continued review of a series of interrelated matters concerning the proposal's public realm and cityscape contribution, architectural expression, sustainability performance, landscape quality 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, 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 Australian Museum, the

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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' (LHP) – 196 North Terrace immediately adjacent the subject site
 - o seven storey residential (student accommodation) building with additional two levels of setback contemporary private residential apartments above the LHP
- Former 'G&R Wills Warehouse' (SHP) – 201-202 and 203-207 North Terrace
 - o two adjoining sandstone buildings with a 35 storey PBSA tower ('The Switch') above the SHP

West of the site:

- 'Gawler Chambers' (SHP) – 188 North Terrace across Gawler Place
 - o five storey 1914 red brick building with cream horizontal banding, symmetrical design and central Tudor-style castellated parapet
- 'Queen Adelaide Club' (LHP) – 182-184 North Terrace
- Myer Centre (former Verco Building) (SHP) – 178 North Terrace.

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. This site forms part of the L-shaped '200 North Terrace' development site, which was publicly announced in March 2026 as a new development site comprising three towers including a student accommodation building positioned to the rear/south of The Angels Lane.

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 building scale, proportion and material relationships. The corner condition presents an opportunity to anchor the intersection and contribute positively to the civic character and streetscape pattern of North Terrace.

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, includes the recessive ground floor and 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 29 levels of student accommodation units and one communal level at the top of the building.

I support the revised design approach, including the increased podium height and a clearer definition of the podium and singular tower. In my view, this simplifies the overall form, strengthens the corner condition and improves the relationship with 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 red coloured brickwork vertical bands infilled by charcoal coloured aluminium window shrouds and secondary horizontal brickwork bands. Within the grid, levels one to three comprise full height clear glazing,

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while levels four to eight incorporate a mix of clear glazing, awning windows and areas of non-vision/shadow box sections. 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, expressed slab edges at every second floor and staggered charcoal coloured aluminium vertical bands, with the intent to establish a recessive tower form that contrasts with the more articulated and detailed podium.

I acknowledge the significant amendments to the podium and tower architectural expressions made through the Design Review process. While the move towards a simpler and more legible architectural expression is positive, I remain concerned that the overall proposition continues to read as highly commercial and does not sufficiently reflect the development's role as a student living environment.

In relation to the podium, I recommend further review of the architectural treatment within the broader North Terrace context. This should consider opportunities to introduce a more distinctive and expressive response that is not overly constrained by the reference to the existing building to be demolished, and that better reflects the residential use.

In relation to the tower, while I support the intent for a singular and legible expression, I recommend further exploration of a clearer structural or ordering device to strengthen the coherence, legibility and architectural quality of the tower composition.

Ground Plane and Public Realm

The proposal seeks to activate the street frontages through a retail/cafe tenancy addressing North Terrace and student entry from Gawler Place. Reception and administration areas are also proposed along the Gawler Place frontage. Services including the transformer, fire control room and waste room are proposed along The Angels Lane, while the fire booster is located on the North Terrace frontage. The lift and stair core are positioned toward the eastern portion of the building, acknowledging the potential for future development along this boundary. A bicycle store and repair station is proposed in the northwestern corner of level 1, with the remainder of the floor predominantly accommodating building services, including fire tanks and pumps, and air conditioning plant.

I support the amendments made through the Design Review process to improve activation of the street edges, including the reconsideration of a 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 to reinforce civic generosity at this highly pedestrianised and prominent city corner, I continue to 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, noting the existing building includes a partial basement level
- 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
- continued engagement with the City of Adelaide to ensure a permeable, integrated, accessible and universally inclusive ground plane outcome.

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Amenity and Layouts

I support the side core configuration, the provision of natural light and ventilation to the common corridors of the residential levels and the interconnectivity between the communal levels 2 and 3. I note that student room sizes are relatively compact and the proportion of communal facilities to student rooms meets the minimum policy requirements in this regard.

In my view, there remain 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, noting the provision of
 - o one (accessible) wc for the level 2 gym, games room and laundry level
 - o one (accessible) wc for the level 3 study and cinema level
 - o three wcs for the level 9 kitchen, dining and bbq terrace level
 - o two wcs for the level 39 kitchenette, study and media level
- 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
- continued refinement of internal-external relationships, including the size, configuration and usability of the level 9 terrace, and increased greening to maximise amenity, northern outlook and solar access.

Environmentally Sustainable Design (ESD)

While I support the proposed ESD initiatives as outlined in the 'M1 PBSA – Summary of Sustainability Initiatives' prepared by Summation, in my view the proposal should identify clear and measurable sustainability outcomes commensurate with the scale of the development. This should include defined sustainability targets, performance benchmarks and any proposed formal certification pathways to ensure ESD initiatives are embedded across all aspects of the project. In particular, a strong focus on building performance is encouraged, 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 understand that the initiative identified by the consultant 'external shading to selected areas to reduce solar gains while maximising views and daylight' has not been incorporated into the proposal, and that the vertical fins are intended primarily for facade articulation rather than to provide a measurable shading benefit.

I recommend confirmation of the following:

- the aspects of the proposal that will achieve a 20 per cent improvement in energy efficiency compared with NCC-compliant development, as stated in the submitted Sustainability Statement
- a detailed materials and finishes schedule, including glazing specifications, supported by a physical materials board
- detailed facade drawings for both a typical podium level and typical tower level to confirm the location of the curtain wall glazing with one third solid aluminium non-vision insulated panels and detailing of the operable windows.

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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 two waste chutes and recommend consideration of waste rooms per level to facilitate convenient disposal of organic green waste, bulky items and packaging.

Summary

To support delivery of the project ambition and to assist in securing the most successful design outcome, the State Commission Assessment Panel may like to consider conditions or reserve matters to protect the following elements of the proposal:

- a detailed materials and finishes schedule, including glazing specifications, supported by the provision of a physical materials board
- detailed facade drawings for both a typical podium level and typical lower level to confirm the location of the curtain wall glazing with one third solid aluminium non-vision insulated panels and detailing of the operable windows
- detailed landscape documentation including planter soil depths, species selection and irrigation strategy to ensure delivery of the landscape and sustainability outcomes as presented
- clear and measurable sustainability commitments, including incorporation of relevant recommendations in the *M1 PBSA – Summary of Sustainability Initiatives* dated April 2026, prepared by Summation and confirmation of how the 20 per cent improvement in energy efficiency compared with NCC-compliant development will be achieved.

I trust the above comments assist with making your assessment.

Yours sincerely



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