File No: 2023/03638/01

9 May 2025

Ref No: 23110028

Ben Scholes
Senior Planning Officer
Commission Assessment
Planning and Land Use Services
Department for Housing and Urban Development
Level 10, 83 Pirie Street
Adelaide SA 5000
Kaurna Country

benjamin.scholes@sa.gov.au

For the attention of the State Commission Assessment Panel

Festival Plaza East Commercial Site (Tower 2)

The following advice is in relation to Development Application 25008091. 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 three occasions. The following advice has been informed by the panel's recommendations. I acknowledge the project team's genuine effort to respond to the recommendations and the place-based thinking and investigations, including engagement with cultural knowledge holders and deeper exploration of the significant cultural, heritage and topographic context that have informed the design approach.

The proposal is for a 38-level (approximately 160-metre tall) tower and podium building (Tower 2), constructed on top of the existing basement car park, to replace the currently approved three-storey retail pavilion.

I strongly support the project team's ambition and intent to deliver the highest quality outcome commensurate with the significant civic, historic and cultural precinct and location.

Development of this site has a responsibility to deliver a world class civic space, an accessible and inviting public realm as well as an exemplary contemporary architectural addition to the precinct. Fulfilling this responsibility will require due consideration of, but not limited to, the interrelated issues of built form massing and architectural expression informed by its context, public realm contribution and relationship with surrounding buildings, particularly those of high heritage value.

91 Halifax Street Adelaide SA 5000 Kaurna Country

I recognise the potential of this project to integrate storylines of Country and deliver a city defining project in relation to its built form, contribution to the public realm and the broader city skyline as well as emphasising the significance of the proposed cultural coalescence relevant to this unique location.

T- +61 8 7133 3235 E- odasa@sa.gov.au

Site context

This cultural precinct of national and state significance includes some of the state's most prominent and important heritage assets. The precinct includes a diverse mix of public, entertainment, cultural and institutional buildings. The Plaza and existing buildings within



File No: 2023/03638/01

Ref No: 23110028

the precinct including Adelaide Festival Centre and Adelaide Railway Station are State Heritage Places. Old Parliament House and Parliament House are both National and State Heritage Places.

I understand the proposal is located at the confluence of several significant Kaurna sites, in particular a former escarpment landform in this location known as 'Tarnda Kanya', Red Kangaroo Rock.

The overall Festival Plaza area is also a key site in relation to critical connections and multi-level public spaces between the city and the Riverbank Precinct and is bound by King William Road to the east, Station Road to the west, Old Parliament House, Parliament House and North Terrace to the south and Adelaide Festival Centre to the north. To the west of the Tower 1 development, separated by Station Road, is the 14-storey tall SkyCity Casino expansion and Adelaide Railway Station building.

The 29-storey tall Tower 1 has been completed, including a new hospitality offering at the north portion of the building at ground level which includes a canopy/external blind system and low level walls/planters. 10 of the 16 arbours proposed within the plaza (to the north of the subject site) have also been constructed. This proposal seeks to relocate three of the constructed arbours, remove four of the proposed (not yet constructed) arbours from the scope of works, resulting in a total of 12 arbours.

Project background

The overall Adelaide Festival Plaza redevelopment commenced in 2016 with the ambition of creating a revitalised public realm, essential links to other parts of the Riverbank precinct and a contemporary cultural destination.

The current approval for the 'Festival Plaza over site development' includes a car park over five basement levels, 29-storey tall Tower 1 office building, and a three-storey tall retail pavilion. This proposal seeks to replace the retail pavilion.

In January 2025, the Festival Plaza Code Amendment was formally adopted. Through a Concept Plan, the Code Amendment provides planning policy for the site in relation to building height, public open space, activation, building alignments and visual and physical connections within the precinct. The Code Amendment was informed by a 'Festival Plaza Urban Design Review' study, commissioned by the state government. The study builds on the foundational principles established by the 2014 Festival Square Strategic Framework, including building setbacks from the surrounding heritage buildings, retention of view corridors and development location/footprint.

In my opinion, the introduction of a second tower, in this location outside of the city grid, that exceeds the height of Tower 1 warrants a thorough interrogation of its merit in terms of its contribution to the public realm, urban form and broader urban fabric.

Podium/Building base

Ground plane and civic spaces

The proposal includes a five-level podium form. The ground level setbacks to the west, east and south reflect the arrangement of the approved retail pavilion scheme. The alignment of the northern columns and podium form protrudes beyond the northern edge of Tower 1 and the north facade of the Railway Station building.

A single storey plinth with a 'grand stair' to an elevated plaza is proposed to the west of the main building envelope, reflecting one of the recommendations from the Festival Plaza Urban Design Review study. The west edge of the plinth is consistent with the existing approved retail pavilion alignment, redefining a ground floor retail/hospitality

91 Halifax Street Adelaide SA 5000 Kaurna Country

T- +61 8 7133 3235 E- odasa@sa.gov.au



File No: 2023/03638/01

Ref No: 23110028

edge and laneway between the two towers. It is proposed as a predominantly solid, masonry element ('escarpment facade') with a series of punched window and door openings. The base of the grand stair and northern recess (entrance to public amenities) are proposed with curved corner geometry.

I understand the intent of the elevated plaza is to capture an approach to place that emerges from the topography and vertical layering from Karrawirra Parri to city and references the cultural importance of the escarpment landform Tarnda Kanya. The raised ground plane is intended as a new public place that creates an opportunity to connect with Country and express the cultural significance of the river as a dreaming site. It is envisaged as a series of dwell spaces that express local storylines (spiritual connection of the Karrawirra Parri to Wodlipari/the Milky Way, and Pudna and Yartamurla/Waterholes and Contours) through material selections, soft and hard landscape elements and artwork. A 'metal wind canopy' is proposed to the west portion of the elevated plaza to provide shelter and mitigate anticipated wind impacts. The elevated plaza also provides an opportunity for closer engagement with the refined northern elevation of Parliament House and a variety of genuine public and active spaces within the precinct. A new public foyer is also proposed at the elevated plaza level, with visual connectivity through to the ground floor public foyer and King William Road.

The King William Road frontage (east) is dedicated to a public foyer and cafe with a main centralised entry point and secondary entry points from the north. Alfresco areas are proposed to the perimeter of the ground plane, including to the southeast cafe. Along the King William Road frontage and wrapping to the northeast corner, a series of platforms and feathered steps are proposed to achieve level transition. Two planters with a double row of Jacaranda trees are intended to provide a consistent landscape strategy with the open plaza further north of the building and define the east entry point to the building. The spacing of the Jacaranda trees and northern planter increases the aperture of the plaza entry from King William Road with the intent to provide a welcoming arrival to the precinct and reinforce the 45-degree ceremonial axis and views to the Adelaide Festival Centre. The narrative of contours, waterholes and river are also proposed to be expressed through materiality and water features, extending from King William Road through the main foyer and up to the new elevated plaza and foyer.

Public amenities are proposed at the ground floor level beneath the elevated plaza, with access from the north. The vertical transportation strategy includes a podium escalator and lift core at the northern end, and a tower lift core located centrally at the southern end.

Above the hospitality tenancies on the ground and first floors, levels two to four include civic spaces and a double height 'sky lobby' within a fully glazed pleated facade. I strongly support the intent to include a civic use within the building base. In my view, the civic use function and its physical and visual connectivity with the elevated plaza will be critical to the success of the raised public realm. I anticipate ongoing consultation and consideration of the civic space functions in the next phase of design development with a view to creating a contemporary public space that genuinely reflects the significance of the democratic nature of the precinct.

91 Halifax Street Adelaide SA 5000 Kaurna Country

T- +61 8 7133 3235 E- odasa@sa.gov.au I also support the following aspects of the ground plane and civic spaces:
- inclusion of the ground floor publicly accessible lobby, supported by a

- inclusion of the ground floor publicly accessible lobby, supported by visual connections to Parliament House
- provision of a new public lobby at the elevated plaza level with visual connectivity through to the ground floor lobby and King William Road
- inclusion of a double row of Jacaranda trees and increased aperture to the plaza entry



File No: 2023/03638/01

Ref No: 23110028

- consideration of the role of landscape elements and materiality to connect the ground plane to the elevated plaza
- provision of public amenities at the ground floor level with northern connection to the plaza
- intent to increase activation of the plaza, including programming and curation considerations
- intent for highly visible light transmission to the pleated facade to visually connect these spaces to the plaza and public realm.

I recognise the potential for the podium/building base to support the design intent to create a city-defining project, acknowledge and reflect the significant cultural and historic importance of place, and provide genuine and active indoor and outdoor public spaces. I support the layering and topographic approach to place and the development's relationship with the topography and spatial qualities of the broader precinct (from city to the Karrawirra Parri), as demonstrated by the section drawing. In my view, it is critical that this project, as a significant built form addition to the precinct, delivers a legible, accessible and genuinely public building base that positively contributes to activation of the plaza. I support the amendments through the Design Review process to provide a generous and permeable edge to the northern retail frontage to the plaza.

I recommend consideration of the following aspects:

- provision of additional visual and physical connectivity from the elevated plaza to the civic space, including:
 - o increased generosity to the elevated plaza public foyer
 - review of opportunities to provide physical connection to the upper levels of the civic space and further express the notion of the escarpment and support legibility of the storyline through materiality, spatial experience and architectural expression
- universal access from ground floor level to the elevated plaza, ensuring genuinely public, safe and seamless level transitions
- refinement of the built form geometry to support legibility of the topographic concept and storytelling that is visually connected to the plaza and distinctive from the tower form above
- ongoing consideration of the elevated plaza/garden experience as an 'outdoor room' including the role of soft landscaping, water and artwork, in deepening our connection to Country through expression and legibility of the storylines
- review of the design approach to the metal wind canopy, noting the highly exposed location and radiant heat due to material selection
- review of the large masonry-clad columns and west wall of the upper podium (tower lift core wall) to reduce their scale and visual impact on the elevated plaza
- consultation with the civic space curator to ensure delivery of the design intent for highly transparent glazing to visually connect to the plaza level
- confirmation of the impact of wind report recommendations (including vertical barriers to the elevated plaza).

Heritage interface and transition zone

The floor plates gradually increase in size between levels two and six, resulting in an approximately four metre built form overhang to the south, six metres to the west and four metres to the north for levels seven and above.

The architectural expression of the southern portion of the podium and transition zone/lower tower section intends to reflect the varying built form context and historic datum lines, including:

 pleated glass facade to the civic space with top edge aligned with the frieze of Parliament House

91 Halifax Street Adelaide SA 5000 Kaurna Country

T- +61 8 7133 3235 E- odasa@sa.gov.au



File No: 2023/03638/01

Ref No: 23110028

 approximately 10-metre tall transition zone between podium and tower at the southern end to provide visual distinction through a masonry expression and use of vertical blades (east, west and south elevations) with the intent to provide a backdrop and visual separation to Parliament House.

In relation to the built form, I support the retention of the building alignment along the King William Road frontage and the intent to maintain visibility of the northeast corner of Parliament House.

I also support the following amendments through the Design Review process that in my view assist in achieving a more respectful relationship with Parliament House:

- reduction of the upper-level floorplates to the transition zone at the southern end
- revised architectural expression and materiality of the 10-metre tall transition zone
 of the south elevation as the main backdrop to Parliament House and consideration
 of a building in the round.

In my view, opportunities exist to improve the development's relationship to Parliament House and reinforce a human scale at the ground floor/plaza level. To this end, I recommend ongoing review of the east and south elevations of the tower base, including consideration of the following:

- extension of the masonry expression to ground/anchor the development
- height and materiality of the canopy to the east elevation, informed by the overall composition and datum lines of Parliament House
- detailed consideration of the relationships between the masonry expression, recessive ground floor glazing, pleated facade and soffits of the base.

Tower

The composition of the tower is intended to be articulated as a grouping of slender forms to provide an urban marker for the precinct, create a dynamic silhouette within the skyline, and respond to PANS-OPS height opportunities. The northeast corner of the tower increases in height, and the facades of the taller eastern forms employ a diagonal geometry of varying modules (three-storey tall modules to the southeast, six-storey tall modules to the northeast) to create a distinctive expression that reflects the geometries of the plaza, Adelaide Festival Centre, and South Australia's floral emblem (Sturt's Desert Pea). The western forms employ a pleated vertical expression to reflect the expression of Tower 1. The four forms are articulated by vertical recesses with horizontal shading elements.

I support the following aspects of the tower form and expression:

- intent for grouping of slender forms within the city skyline
- concept for the western forms to be related to but distinct from Tower 1 through architectural expression (verticality) and facade colour (lighter)
- concept for the eastern forms to provide a marker for the precinct through height differentiation and facade expression (diagonal)
- roofline treatment and its relationship to the overall planar language and contribution to the unique expression.

To deliver the design intent for an exemplary and city-defining project, I recommend ongoing review of the following opportunities to simplify elements of the tower architectural expression and materiality:

- review of the facade of the eastern forms as a planar/folding of the surface rather than expression of the diagrid structure
- review and refinement of the geometries utilised (curved and diagonal) to ensure a coherent architectural expression for the development as a whole

91 Halifax Street Adelaide SA 5000 Kaurna Country

T- +61 8 7133 3235 E- odasa@sa.gov.au



File No: 2023/03638/01

Ref No: 23110028

 review of the opportunity to further express the storylines within the publicly accessible rooftop hospitality space (ceiling and lighting).

In my view, it is also critical that this proposal is being considered and developed together with the recently completed Tower 1, as a significant backdrop to Parliament House and the wider civic and historic precinct.

I acknowledge the proposal for external building signage zones to the south, north and west elevations. Noting the existing Tower 1 building signage, I am not convinced by the signage numbers and size for Tower 2, as in my view, more discrete or a reduced number of signs would be appropriate given the proximity to Parliament House and distinct architectural expression and scale of the building.

Environmentally Sustainable Design (ESD)

I support the design team's ambition and intent to embed practical and simple design solutions to achieve a climatically, socially, and economically sustainable outcome. To ensure an integrated ESD and architectural outcome, I urge ongoing consideration and integration of passive design principles, including development of the solar shading strategy, acknowledging the proposal for use of high-performance glazing and perforated metal shading elements. Management of glare impacts on the surroundings, including Government House to the east, should also be carefully considered.

Advice summary

In my view, the success of this project is contingent on upholding the integrity of the project's cultural and design principles, to deliver an exemplary and integrated public realm, architectural and landscape response.

To ensure the most successful design outcome is achieved the State Commission Assessment Panel may like to consider particular aspects of the project, which would benefit from protection as part of the planning permission, such as:

- final external material selections, including confirmation of high-quality integral finishes supported by the provision of physical samples
- confirmation of the design, materiality and detailing for the elevated plaza including surface treatments, plant species selection, public artwork, wind canopy, and detailed consideration and integration of wind barriers (as recommended in the wind consultant's report)
- development of the design and detailing through prototyping of the podium elements (escarpment facade, shaped column cladding)
- development of the design and detailing through prototyping of the three tower facade types (diagrid pleats, vertical pleats, tower secondary facade)
- detailed design of the public laneway including soft and hard landscape elements and the fence to the north of Parliament House
- detailed design of the canopies to the public laneways
- review of the number and size of the external building signage zones.

Yours sincerely

91 Halifax Street Adelaide SA 5000 Kaurna Country

T- +61 8 7133 3235 E- odasa@sa.gov.au Kirsteen Mackay Government Architect

cc Belinda Chan ODASA belinda.chan@sa.gov.au

