

Enquiries: Janaki Benson - 8203 7283
DA reference: 26000407



11 February 2026

State Commission Assessment Panel
GPO Box 1815
Adelaide SA 5001

Karna Country
25 Pirie Street, Adelaide
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South Australia 5001

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ABN 20 903 762 572

Dear Sir/Madam

Application: 26000407
Applicant: Beausight Investment Pty Ltd
Addresses: 143-151 Gray Street & 254-260 Franklin Street, Adelaide SA 5000
Description: Construct 13 level mixed use building with ground level retail, 10 levels of dwellings including affordable housing and associated ground and above-ground car parking, communal areas and landscaping.

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.

TRAFFIC

- The carpark roller door should be set back 6 metres from the boundary to prevent vehicles from queuing over the footpath.
- A lack of bicycle parking spaces and end of trip facilities is a concern.
- Vehicular access should provide clear sight lines to pedestrians in accordance with the requirements of Clause 3.2.4(b) of AS/NZS 2890.1-2004 – Figure 3.3.
- The proposed northern crossover removal and widening of the southern crossover should be included on the civil plan (with dimensions) to meet the requirements of AS/NZS2890.1.

STORMWATER

- Calculations provided are based on the Rational methodology to determine the pre-post development flow rates for the 20% AEP (1 in 5-year ARI) and 10% AEP (10-year ARI) however, Council's requirement is 1 in 5-year ARI (20%) for a minor storm event and 1 in 100-year ARI (1%) for a major storm event.
- The Mass Curve Technique (below) for the detention required should be revised to reflect Council's requirements.
- The finish floor level of the building along Gray Street is less than 300mm above the top of the kerb. An assessment needs to be provided to advise why it is not possible to achieve the

The City of Adelaide acknowledges the Karna 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.



300mm above top of kerb or any mitigation strategies in accordance with the Hazards (Flooding – Evidence Required) Overlay.

- For Council to assess the management of proposed site stormwater drainage, the following issues should be considered:
 - The hydrological calculations should take into consideration the contributing catchment due to the height of the building (critical side of the building), refer to “AS/NZS 3500.3.2025 plumbing and drainage guideline”
 - Information on the current drainage system of the site (how the existing site currently drains)
 - No more than 15L/s should be discharged to a single outlet on the water table of any adjacent street (noting a discharge rate of 24L/s is proposed)
 - The detention volume of water required against the 1% AEP (allowing 5% AEP predevelopment flow rate out)
 - Estimation of the retention volume (WSUD) as per the State Government’s requirement (retention of stormwater to be used for toilet flushing and landscaping irrigation)
 - Ensure runoff being discharged to the Council drainage structure is free of pollutants (the use of “on-site tool “program can be utilised)
 - Connection details to the Council drainage system should be submitted to Council for consideration and approval. They mentioned pipe to pipe connection per City of Adelaide DR054; the correct detail is CoA354.

WASTE MANAGEMENT

- Council does not regulate waste collection activities undertaken by private contractors wholly within private land.
- As collections are proposed to occur outside of peak traffic periods, the operation is not anticipated to adversely impact the surrounding road network.

STREET TREE

- The installation of an awning over the Franklin Street footpath may require pruning to an established regulated street tree.
- If ‘tree-damaging activity’ is proposed, an assessment against relevant provisions of the Regulated and Significant Tree Overlay will be required.

ENCROACHMENTS

- The ‘landscaped pods’ are proposed to encroach into the public realm at levels 1 and 2. To meet Section 4.2.7 of Council’s Encroachment Policy, the applicant should confirm that the pods will be maintained, pruned and watered to ensure ongoing plant health and pedestrian safety.
- The awning to Gray Street is likely to be hit by vehicles with a setback less than 600mm from the kerb. This should be amended to ensure the awning meets Section 4.2.4 of Council’s Encroachment Policy as follows:
 - be setback a minimum of 600mm from the kerb
 - be setback a minimum of 1 metre from a trunk and/or major limb of a street tree
 - have a minimum vertical clearance between the top of the footpath and lowest underside of 5 metres (if setback less than 600mm from the kerb)
 - incorporate lighting on the underside of the awning.

Please contact Janaki Benson on 8203 7283 if you require any clarification.

Yours faithfully



Michael Sedgman
Chief Executive Officer



Reid, Joanne (DHUD)

From: Janaki Benson <J.Benson@cityofadelaide.com.au>
Sent: Monday, 25 May 2026 10:28 AM
To: Reid, Joanne (DHUD)
Cc: Seb Grose
Subject: Council Comments (Re-Referral) DA 26000407: 143 -151 Gray St and 254-260 Franklin St Adelaide

Dear Jo

Council Comments (Re-referral) 26000407: 143 -151 Gray St and 254-260 Franklin St Adelaide

Please see below Council's comments in response to the applicant's referral response sent to Council on 6 May 2026. These comments are in addition to Council's previous referral comments dated 11 February 2026 and those comments still stand where relevant.

- **Street Tree**

- Noting commentary regarding the setback of the canopy to the street tree limbs, no detail of the encroachment of the building into the Tree Protection Zone (approximately 4.3 metres) of the Styphnolobium (a.k.a Sophora) japonicum Pagoda Tree has been provided. As outlined in Council's previous comments, if 'tree-damaging activity' is proposed, an assessment against the *Regulated and Significant Tree Overlay* should occur.

- **Transport, Access and Parking**

- Council comment
 - *'The carpark roller door should be set back 6 metres from the boundary to prevent vehicles from queuing over the footpath.'*
 - Council response to applicant's response:
 - The proposed queuing length of 4.6 metres between the boundary and roller door does not satisfy the 6 metre per vehicle requirement of AS/NZS 2890.1:2004 Clause 3.4.
- Council comment
 - *'A lack of bicycle parking spaces and end of trip facilities is a concern.'*
 - Council response to applicant's response:
 - The shortfall of 67 bicycle parking spaces is not supported
 - End of trip facilities have not been provided for the retail component.
- Council comment
 - *'The proposed northern crossover removal and widening of the southern crossover should be included on the civil plan (with dimensions) to meet the requirements of AS/NZS2890.1.'*
 - Council response to applicant's response:
 - Not addressed, please provide civil design plan.

- **Stormwater & Flooding**

The following matters remain unresolved:

- The finished floor levels do not meet the requirement of 300mm above the top of the kerb adjacent streets
- Retention is required (WSUD) per the State Government requirement (retention of stormwater to be used for toilets flushing and landscaping area irrigation)
- 225 RCP connecting into trunk main on Franklin Street from new catch pit is required to be a 375 RCP which is the minimum size of RCP required

- Clarify the purpose of the grated trench and how it connects into drainage system
- Access driveway must have a high point to channel the runoff back to the street
- Please provide Drains and Music model for Council consideration

I trust this assists, and please contact me if you require any further clarification.

Kind Regards

Janaki Benson

Senior Planner

Regulatory Services

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