Appendix D: Written Submission Review and Council Consideration

Each submitter was contacted to seek approval for their submission to be published as part of this report. At the time of publication, eight submitters had provided their endorsement.

Where endorsement has not been provided, a summary of the submission is included below, with the matters raised remaining captured in the detailed analysis table.

Submission Summary:

One submission was provided by an existing landowner in Murray Street. The submitter provided high-level feedback on the draft Structure Plan, identifying a series of priority areas they believe should guide future planning and implementation.

These included improving public spaces and accessibility, enhancing transport and green infrastructure, supporting coordinated commercial and residential development, planning for community services and future needs, and ensuring alignment with Council's long-term vision and community aspirations.

[redacted]

From: [redacted]
Sent: Tuesday, 30 June 2026 03:48 PM
To: Council
Subject: Feedback on Draft Gawler Town Centre Structure Plan

Dear Project Team,

Thank you for the opportunity to review the Draft Gawler Town Centre Structure Plan.

The document presents a clear vision for accommodating growth and strengthening Gawler Town Centre's role as a regional centre. In particular, the proposed increase in development intensity, mixed-use opportunities and investment in public realm improvements provide a strong framework for future growth.

One area where further detail would be beneficial relates to the infrastructure implications of the proposed growth scenario. While the Structure Plan identifies significant opportunities for increased residential, commercial and mixed-use development, it is not clear what supporting infrastructure, transport and service upgrades will be required to accommodate this increased intensity of development.

It would be helpful for the final Structure Plan or associated implementation documentation to clarify:

- What key infrastructure upgrades are anticipated to support future growth (e.g. transport, stormwater, water, sewer, power and community infrastructure).
- Whether any capacity assessments have been undertaken to identify infrastructure constraints.
- Which agencies or organisations would be responsible for funding, delivering and maintaining the required infrastructure.
- How infrastructure delivery will be coordinated and staged alongside redevelopment and population growth.

Providing additional clarity on infrastructure servicing requirements and delivery responsibilities would strengthen confidence in the long-term feasibility and implementation of the Structure Plan.

Kind regards,

[redacted]
Professional Infrastructure Nerd

Draft Gawler Town Centre Structure Plan Submission

As a Gawler South resident I wish to make a few comments about the plan, not using the on-line questionnaire which I found rather restrictive.

Structure Plan – Key Moves

The second point in that section is the proposal that town centre land should be rezoned to facilitate large developments. That is not in Gawler's interests. There are already 4 large supermarkets in Gawler - more than is needed. Every housing development in the region has or will have it's own supermarket, e.g. those now at Gawler Green and in Gawler East What will bring people to town centre is the specialist shops and services which are not in every neighbourhood shopping centre.

The loss of a number of small shops for the Aldi development has weakened Gawler's retail offering. Rather than rezoning for large developments, encouraging the creation of smaller allotments will make for a more diverse and active town centre.

Built Form

The attraction of Gawler comes largely from is heritage look, smallish scale buildings and walkable country town atmosphere. The Clock Tower and Civic Centre were intended to be the dominant buildings. In my view it would be a disservice to the community to allow higher buildings than those two so I would prefer height limits to stay as they currently are.

The idea that new buildings should not be made to look old conforms to the view of some heritage professionals but as a throwaway line in the plan it condemns Gawler to be filled with the same glass and concrete buildings as in every other modern place. Eventually the heritage buildings look as if they don't belong. Better would be to use the opportunity to define a style and character for Gawler, something like stone or plaster frontages with plentiful detailing.

Transport

Gawler's town centre will always be constrained by the geography of the river and the rise on it's eastern side. It's inevitable somewhat linear development is something we must accept or we will destroy everything that makes the town attractive.

The consultants correctly point out that there are more commercial vehicles and general traffic in Murray St than is desirable. Other than serious bypass roads such as extensions to Schomburgk Drive, there is no entirely effective solution, there being problems with the two plans suggested.

Making High St one way to encourage commercial traffic away from the main street means more traffic making a sharp right hand turn into busy Calton Road and immediately left into Murray St. The larger vehicles are likely to avoid sharp turns and roundabouts and continue to use Murray St. The illustration of High St with gardens and happy pedestrians in the plan is probably delusional.

The proposal to make Light Square two way to encourage traffic into Reid St is fraught with difficulties. Traffic from Church Hill to Reid St and Murray St to Church Hill will clash with that between Murray St and Reid St, making for a high accident intersection unless lights are installed or Church Hill cut off entirely. Extra traffic on Julian Tce and Reid St is also an issue with the Post Office roundabout already busy with traffic to and from the ford river crossing. Furthermore, that intersection has to deal with muliple pedestrian movements between Post Office, Aldi, Drakes and the park/toilets.

It seems inevitable that the passenger railway services will sooner or later be extended beyond Gawler Central, a very desirable outcome in order to allow people to come to town centre pass through Gawler without using their cars. The consultants have not in any detail considered how to facilitate this in terms, among others things of a possible second platform on the east side of Murray St to reduce the impact on traffic flow of trains crossing the main road.

The existing bus service is designed to get people to and from Gawler Station. A regular service linking Gawler Green, Murray St. and the railway stations would be of value and may have some influence on the amount of traffic. The main stop in Murray St outside the Civic Centre needs a bus shelter and dry seat. Out of the study area, the bus stop on Lyndoch Road down from the hospital where both routes converge also needs a shelter. I had to stand there for twenty minutes after coming out of surgery.

Random Thoughts

Pedestrians on Adelaide Road who are crossing the entrance into Twelfth St do so at considerable risk to themselves. The consultants have indicated a pedestrian crossing there : a safety island or two would be beneficial, as would a couple more crossing places further along the street. On the subject of Twelfth St., it would be really useful to give it a name such as the original Bridge St – when giving directions to people they never know which street number is which. It is, after all, a main road.

When visiting other towns I tend to judge them by the convenience of surface level parking and the quality of their public toilets. The only directly accessible public toilets in Gawler are the tin sheds without toilet seats opposite the post office. That does let Gawler down. A quality toilet block with its own entrance from a public street or lane is much needed, as is an open toilet at Gawler Central station, the lack of which causes a problem for people driving from further afield to catch the train.

Thanks for the opportunity to comment

[redacted]

2nd July 2026

3 July 2026

The Draft Gawler Town Centre Structure Plan is to be commended for attempting to maintain the streetscape character as viewed from Murray Street, including the southern entry vista looking up to the rear of Martindale House on the Gawler East Escarpment. However, the plan fails to protect other important vistas in the broader townscape, arguably more important than Murray Street, and if implemented would result in irreversible destruction to Gawler's unique heritage and landscape character.

The Light, Finniss & Co. plan for Gawler is of outstanding significance as a whole and includes the Church Hill State Heritage Area - the only residential area in Gawler to retain its nineteenth century atmosphere. As planned, Gawler is effectively formed around a triangular valley, with the Church Hill and 'Nob Hill' (Duffield St, Gawler East) escarpments dotted with grand heritage residences overlooking the commercial district below, bounded by the tree studded South Para River on the third side.

In the nineteenth century Gawler was known as the Colonial Athens, and in this respect it occupies a natural amphitheatre similar to that of its namesake, though obviously on a more intimate geographic scale. Historic mansions like Martindale ornament the ridge lines in the manner of pedimented Greek temples, forming key focal points when looking across the valley from one side to the other. A few of the most important historic buildings like the institute and town clock are visible above lower surrounding commercial rooflines, as originally intended given their prominence and function. They should remain so.

The proposed increase of height limits to the commercial areas, particularly on the western side of Murray Street, above the current 2 storeys would effectively sever the town in two, disconnecting the two residential sides of the town by removing these shallow, unbroken views of opposing escarpments and linear parkland trees. It is incompatible with the heritage character of South Australia's first country town.

As a case study, this submission will present examples of significant views from Moore Street, the highest point on the south east face of the Church Hill escarpment in the State Heritage Area. Due to its elevation, if views of the town clock, Institute, Gawler East escarpment and South Para trees can no longer be appreciated from here, they must be considered lost, representing irreversible damage to the historic townscape character [See appendix of photographs].

The landscape views from Moore Street are unique in the Gawler plan, as it contains the only elevated south east facing allotments in the town due to its unique topography. The only historic residential street in metropolitan South Australia of similar architectural integrity, elevation and orientation is Edwin Terrace in Gilberton - frequently rated as Adelaide's most desirable address for these reasons. Indeed, in conversation a former Mayor of Gawler referred to Moore Street as the 'best street in town'. Rightly so. It contains the highest concentration of larger historic residences in Church Hill, and is located at the start of the Church Hill heritage walking tour where interstate and overseas visitors frequently remark on the beauty and integrity of both the immediate streetscape and the broader open views obtained between the houses and from the buildings and private gardens themselves.

The allotments to the south eastern side between Moore and Finniss streets contain six surviving historic dwellings, and in each instance without exception the principal rooms of these houses are located on the rear (town) side, facing the open view to the South Para

River and the Gawler East escarpment across the town below. If this view is lost, the unique architecture of these historic buildings no longer makes sense, and substantial investment in their restoration and maintenance would become much harder for their private owners to justify.

'Winstowe' (13 Finniss Street), once home to many notable citizens of early Gawler, has a transverse plan with entry from Light Square but the main rooms are on the LHS of the hall, presenting a two storey facade overlooking the town. New development height limits as proposed on the opposite side of Reid St and in Baker Reserve below would dwarf this important residence and destroy the context of its prominent elevated site on the threshold of the State Heritage Area.

The pair of conjoined cottages at 2-4 Moore Street literally have their backs turned to the nearby street, with the main facade and entrance doors on the opposite side framing beautiful unbroken views overlooking the valley across to the wooded escarpment of Nob Hill. The internal planning of these cottages is also uniquely adapted to their elevated open setting, with the doorways of between the three principal rooms and hallway of each cottage aligned on the main window to form diagonal 'enfilades' that allow for broader panoramic townscape views to be appreciated beyond the main central axis. If another level was added to the height of the existing Woolworths/Big W complex, the top of that new building would now form the horizon with the landscape beyond rendered completely invisible. Similarly Baker Reserve.

The larger houses at 6 and 8 Moore Street each present a single storey entrance facade to Moore Street, but their largest reception rooms occupy the two storey facades with balconies to the rear, overlooking the view. Interestingly, both houses have matching glazed doorways at both ends of their central hallways, allowing them to be 'seen through' from end to end when open. Remarkably, the hallway of no.6 was built on a direct axis aligned with the town clock, which could thus be seen down the barrel of the hall right through the centre of the house when viewed from the street. Even more remarkably, careful observation shows that the house at no.8, built later and 25 metres further up the street, is set at a slight angle to both the street and no.6 - allowing it to also be centred on the view of the tower in a similar fashion, as much as the constraints of the site allow while still appearing roughly parallel. Today, this axial vista is best appreciated from the side garden of no.6 where it has been carefully framed by trees - ironically the view down the main axis of the house is now partially compromised by the intrusion of one of the numerous imitative faux 'towers' atop the Big W complex, no doubt designed to break up its massive existing form and attempt to blend it into the townscape!

Moving forward, unique, striking geometry and sight lines such as these should be protected, enhanced and celebrated as integral to the historic architecture and beauty of the town. Adding another level to the existing Woolworths/Big W would entirely block the tower and wooded Gawler East escarpment from Moore Street, as would taller buildings further south, particularly in the block between Todd St and Walker Pl, near the current post office. The beauty of the view of the tower and hillside from the area near the Reid/ Todd St roundabout is a further incentive to limit the height of this area to 2 storeys.

It is also worth noting that the aforementioned houses on the south eastern side of Moore Street were built after the north western side of the street was already developed. Again without exception, the newer houses are carefully interleaved so that those on the opposite side retain glimpses of the broader south eastern view. Without this view, the context of the street and its sensitive architectural development would be lost. The strict

enforcement of appropriate two storey height limits in the town centre precinct is imperative. The recent Ginos group development approval illustrates that lower developments can still be financially viable, and additional floorspace can be included below ground if needed.

Baker Reserve

Due to its historical significance, Baker Reserve at the corner of Finniss and Reid streets was donated to the National Trust before being transferred to the Gawler Council on the condition that it remains a public park and is not developed. The Draft Gawler Town Centre Structure Plan ignores the existence of the park and proposes multi-storey development on the site. This must not be allowed. From the perspective of the Moore Street vistas already outlined, the open green space provided by this park is a critical element of the landscape. Multi storey development (even at the southern end of the site on the unencumbered separate title occupied by the majority of the existing carpark) would adversely impact if not completely block a significant portion of the townscape views from the Church Hill escarpment.

Similarly, any development of the nearby land currently used for car parking behind Hyde & Partners medical centre adjacent to Finniss St should be much lower than proposed, and sidelines from the junction of Moore St and Light Square to Martindale house should be considered.

Drakes

Finally, the Drakes site should be restricted to a similar height to the current supermarket building. Without exception the residential heritage buildings surrounding it on Jacob street are all single storey. The imposing Uniting Church should retain its prominence as the only taller building on the block. If second storey was added to the height of the existing Drake's supermarket, it would intrude on the view of the South Para linear trees when viewed from church hill. If a third (or fourth) storey was added, it would sever this horizon and be a blight on the landscape.

Rear of Pile's Buildings (and similar)

The rear elevations of these buildings, and similar shops along Murray street, are a highly significant element of the historic townscape and should not be masked from view by new development, let alone at the increased heights proposed.

Appropriate sites for 3 storey development

The area between Whitelaw Terrace and Murray street, to the south of Kingsford Hotel, is the least intrusive. But any development should not exceed the height of the Fig Trees or obstruct the view of the broader landscape when seen from the Gawler East escarpment.

Light Square / Reid St Traffic

Murray Street should remain the primary traffic thoroughfare as originally intended, and additional traffic should not be diverted along Reid street beside existing residential areas. Ideally Light Square should not be reshaped, and regardless of any future outcome Moore Street should retain two way access (entry and exit) at its eastern end.

Appendix of photographs



Above: Martindale and the Gawler Institute building as viewed from the window of the principal room of a historic house in Moore Street.

Right:

View of town clock and 'Pine Lodge' from the public footpath in front of no. 6 Moore St.

Note the height of the existing Woolworths / Big W rooflines immediately below in both photographs.





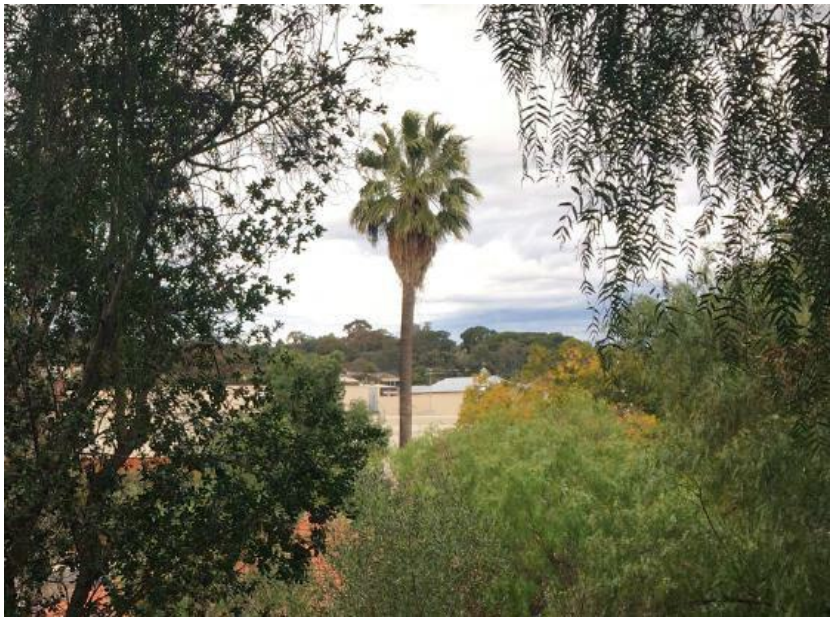
Above: View across Drakes site to South Para River from the Church Hill escarpment. Clocktower and ‘Pine Lodge’ to the far left, Uniting Church to the Right.



Right: Gawler East escarpment with rear of historic main street shops just visible over Woolworths from Church Hill.

Below: View towards Martindale between nos. 6 & 8 Moore Street. Again note height of existing Big W roofline immediately below.





Left:

Distinctive roof and ventilator of the Gawler Institute visible to the right of Baker Reserve palm tree against the backdrop of the Gawler East escarpment.

Stone side wall of Institute building concealed behind Woolworths service baffling.

Right:

A glimpse of Martindale on the Church Hill State Heritage Walking Tour, as seen from the footpath outside no. 4 Moore Street.



Below:

View over Baker Reserve to Gawler East escarpment from the cottages at nos. 2-4 Moore Street. Note existing gradation of height from Fasta Pasta down to the taller Woolworths building. Anything higher on this site would sever the link between the two escarpments.



SUGGESTION FOR ENHANCEMENT OF MURRAY STREET, GAWLER

REQUIREMENTS

16 large pots and planter boxes @ $150 each	$ 2500
Potting soil and compost	$ 1500
Seedlings - annuals, twice yearly	$ 250
Victory Square - 2 garden beds (shrubs & annuals)	$ 350
Fertilizer - granules and liquid	$ 220
Equipment - forks, handtools, watering cans	$ 150
	$ 4970

This is for initial set-up.

For each new season - plants, fertilizer, compost $ 500

Labour

- By volunteers. I am prepared to co-ordinate
- In summer months, water Mon.,Tues., Fri. early morning
- In winter check weekly for weeds and maintenance
- Watering - use of Council graffiti 'ute which has 2 large water containers. The 'ute is used on Tues., Wed., Thurs. by the graffiti team. We can start early on Wed. to ensure availability for Wed. G. team

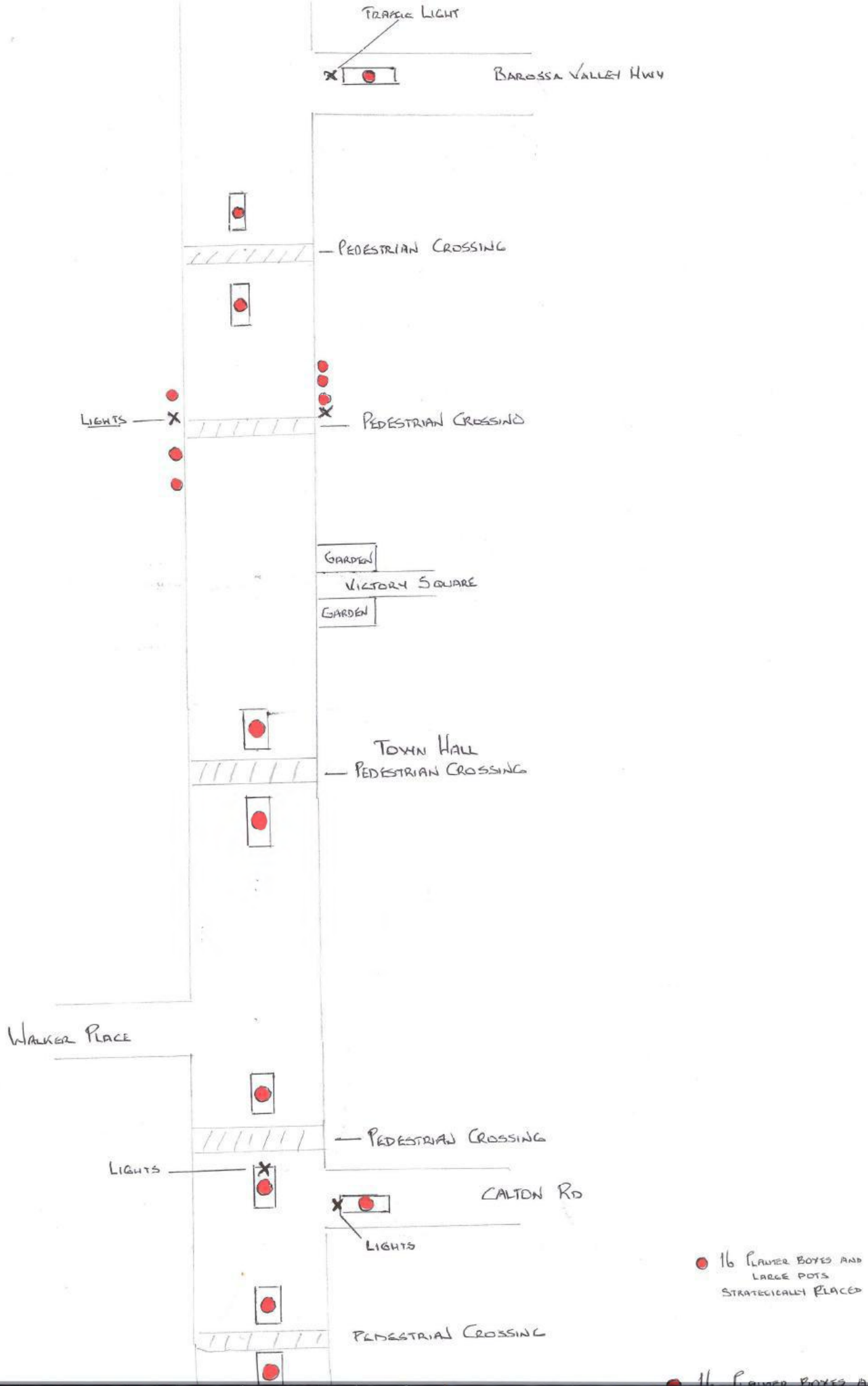
Andrew,

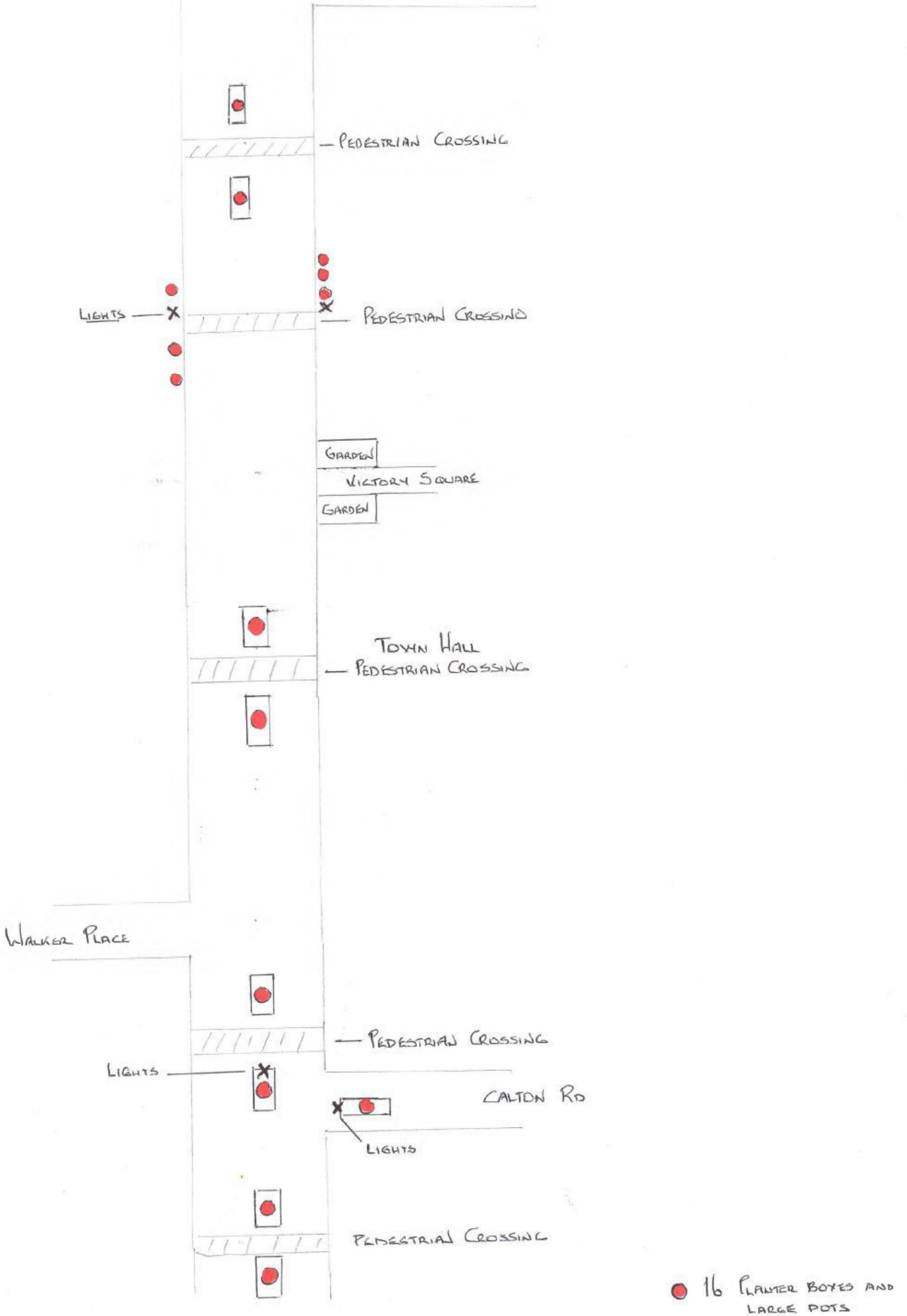
These are my thoughts.
I understand there may be some by-law or restrictions for certain areas.

Kind regards

[redacted]

12/06/2026


TRAFFIC LIGHT
BAROSSA VALLEY HWY
PEDESTRIAN CROSSING
LIGHTS
PEDESTRIAN CROSSING
GARDEN
VICTORY SQUARE
GARDEN
TOWN HALL
PEDESTRIAN CROSSING
WALKER PLACE
PEDESTRIAN CROSSING
LIGHTS
CALTON RD
LIGHTS
PEDESTRIAN CROSSING
16 PLANTER BOXES AND LARGE POTS STRATEGICALLY PLACED


PEDESTRIAN CROSSING
LIGHTS
PEDESTRIAN CROSSING
GARDEN
VICTORY SQUARE
GARDEN
TOWN HALL
PEDESTRIAN CROSSING
WALKER PLACE
PEDESTRIAN CROSSING
LIGHTS
CALTON RD
LIGHTS
PEDESTRIAN CROSSING
16 PLANTER BOXES AND LARGE POTS STRATEGICALLY PLACED

[redacted]

From: [redacted]
Sent: Tuesday, 30 June 2026 01:48 PM
To: Council
Subject: Draft plan comments

Hello
Your plan said 3rd July, but survey has closed.

I would like to note that I object to the 'development' of the old areas parkland (1839). (sites 1 and 2)
RVs need somewhere to park
We still need an ambulance site.

I think any green open space could be further planted out with natives, Apex park, Clonlea park, and Dead Mans Pass

Car parking should definitely be underground, like Woolworths and Hyde Park surgery. Very disappointed that Aldi doesn't have underground parking.

Accommodation could be put over shops on Murray St. Shop frontage being in a heritage style. Sympathetic to local existing heritage buildings.

Keep the 'old world feel' keeping Gawler attractive to tourism. NOT yet another generic suburb. People will come to Gawler because it is different. We can always go anywhere else for shopping malls.

Thank you
[redacted]

Gawler Environment and Heritage Association Inc.
Established 1980. Registered Charity
Email: [redacted]

3 July 2026

Draft Gawler Town Centre Structure Plan Submission

Gawler Environment and Heritage Association [GEHA] is a regional community group (90 members) supporting activities related to history, built and cultural heritage, the natural environment, climate change and environmentally sustainable living. GEHA has been in operation since 1980 actively promoting an understanding of the Aboriginal and European history of our region and particularly involved in the protection of heritage buildings and places in Gawler and the heritage character of the town and region.

Overall view of Draft Town Centre Structure Plan

The leading imperative for the Town Centre should be - **How can the Town Centre be saved from dysfunctional development?**

Gawler town centre layout are locked into a 19th Century country town structure. The Adelaide Metropolitan Plan 1966 for a period spanning 40 years elevated Gawler and its centre but serving a much smaller population than exists now. To respond to the projected growth, modest town and centre movement changes were made, notably reducing heavy transport in the town centre.

Unplanned and completely left field in terms of its impact on Gawler and its community, Gawler East/Springwood has been added, Roseworthy is developing, and Concordia and Kudla are pending. The Centre has struggled to service the current and broader catchment community, and plans for additional internal capacity, mostly commercial, makes no sense because a Centre that does not function well will not attract investment.

The town centre layout and structure with its historical 19th century straight jacket has limited capacity to grow without destruction of its amenity, heritage, and notably as a consequence - commercial appeal.

A reality of the town centre's movement system is that most traffic is through traffic without stopping to shop or do business. As an example south and east residents use the centre to drive to Xavier and northern/eastern residents to Trinity and Gawler College. Similarly for quite a bit of other school and childcare traffic. The Jenson + report fails to quantify and identify this dynamic. Movement systems are near capacity. Additional development in the centre will generate additional movement and consume road capacity.

The premise of the Town Centre Strategy – "Growth" - is misplaced. The correct foundation is to stabilise growth and rebalance the direction of the current trajectory.

Many of the answers to the town centre's functionality, character and appeal reside in external planning decisions and infrastructure outside of the Town Centre. Complementary centres [some existing in Gawler such as at Evanston] and nearby new centres such as Concordia, Roseworthy and Kudla, and a ring route movement system to allow traffic to avoid Gawler Town Centre are part of

the solution. The Lyndoch Road/Sturt Highway connector associated with the development of Concordia is urgently needed to assist with this.

As to how to manage the centre itself, concepts of pedestrianisation, greening, liveliness, and entertainment services like cafes and restaurants need increasing residential presence in the centre.

The amenity ideals for the town centre will be unachievable if the centre is over-developed and its movement system is debilitated. Importantly, investment will not be attracted to disfunction.

The draft strategy in advocating major growth in response to regional population demand is a pathway to the town centre's decay. The foundation of the draft strategy needs to be revisited.

Summary of main proposals/issues

The Draft proposes many good changes to improve pedestrian and cyclist movement, calm traffic flow in Murray Street, and for landscaping and signage. These changes can be made without changing zones or height limits.

Currently the whole Town Main Street Zone has a Guideline height limit of new development of 2 storeys or 8-10 metres but approvals have been given above this – e.g. the recent Ginos proposal on Murray St opposite Kingsford Hotel has a set-back third storey approved.

Essentially the Draft creates a Vision of a massively "bigger" town centre and claims the current zoning is unlikely to achieve this and therefore different zoning and height limits are needed.

Our main concerns focus on:

Traffic and Town Centre functionality – there is tinkering with traffic movement in the Draft Plan [one way in northern part of High St, 40 kph limits in central area] but no serious assessment of traffic impacts and issues in Gawler town centre arising from Springwood, Roseworthy, Concordia, Kudla and other regional development in the next 30 years. Impacts which will undoubtably occur unless there is appropriate matching centre development in these other centres. Because development in these other centres will always lag residential development, there is already a major issue looming in the next 10 years or so.

Currently the town centre is generally described as being at or near capacity for reasonable traffic movement. Even in the last 12 months there has been a noticeable jump in traffic movement and parking usage. How on earth the town centre is expected to cope with very significant traffic impacts from disruption caused by new development and then the extra traffic generated by new development is not dealt with much at all, let alone adequately, in the Consultants' report.

Gawler town centre has major bottlenecks and few options where disruption to traffic occurs from accidents, floods etc. Potential visitors experiencing such events will eventually go elsewhere – so this Plan could be an own goal for the Town Centre.

Car parking is also an issue but in our view most of the car parking associated with bigger new development should be developed on site, including undergrounding. That does not work for many smaller sites and some new areas of car parking will be needed.

Town Centre Character – the current low scale, 2 storey or 8-10 metre limit, protects the historical character of the town centre and should be retained. There is an important rhythm to the town

centre buildings. Given obvious constraints there is no way that more than a handful of major developments imagine in the Draft Plan will occur in the town centre. This rhythm would be completely disrupted by a handful of very large 4-5 storey buildings which would result from this proposal.

The Plan should concentrate on opportunities for redeveloping low scale buildings including significant residential component, especially on sites that are currently detrimental to the town centre character. Financial incentives need to work for this smaller scale but desirable development. Allowing a few larger sites to grab any expansion of town centre capacity has just the opposite effect to what is desired.

Adelaide Road

Current zoning provides for a relatively low-key entrance/exit along Adelaide Road. The proposed change of zoning to encourage 3 storey development and dense residential development goes against what has been in place for many years and zoning and height limit changes would massively impact the character of this part of the town centre. The indicative plans showing much larger footprint buildings are completely out of character with this area currently. The only change is needed is potentially to also create a sub-zone here with appropriate much more detailed subzone planning provisions to ensure good quality development consistent with historic character.

Vista impact

Vistas of historic buildings and vegetation are a major part of the appeal of the Gawler Town Centre. Some of these are shown in the photographs in Appendix 1. The vistas are particularly powerful because of the topography with most of the town centre significantly lower the elevated surrounds comprising the Gawler East escarpment that is lower towards the north but is still present to an extent to Pioneer Park, and to the west and north the higher areas of Church Hill and along Cowan Street to Murray Street. On the southern side the magnificent band of River Red Gums along the South Para and Moreton Bay Figs along part of Julian Terrace.

Views from Light Square to Gawler East houses and trees and the South Para, views from the Lutheran Church/corner of Finniss/Dundas streets to Gawler East and the South Para and Tod Street Uniting Church, views from houses in Church Hill over the town centre and to Gawler East, views from Julian Terrace to Gawler East houses [including prominent heritage places] and trees, views from High, Duffield and Daly streets across the town centre and the tree-lined South Para, views from Pioneer Park of town centre. The ability to see the taller heritage buildings and the vegetation along the South Para and Gawler escarpment are a key reason for locals and tourists to enjoy walking around Gawler. We know this from conducting walking tours around central Gawler for more than 40 years.

It is unacceptable that vistas have not been assessed adequately. Some assessment has occurred [see Appendices pages 41 and 123 of 146] but this is almost entirely focussed on main vehicle movement type positions [noting pedestrians have similar experiences] but ignore many of the vista opportunities into the town centre from its perimeters and the many wonderful views of heritage buildings and perimeter vegetation that occur constantly when walking around the town centre.

If we want a pedestrian attractive town centre this is important. In particular there are many views of the sides and rears of historic buildings that add to the ambience for pedestrians. The Draft Plan has significant assessment as to what setbacks are required to limit the impact of higher buildings on

historic Murray Street buildings but this is entirely inadequate in assessing the impacts more generally except for buildings that only have their front visible which is a negligible proportion.

Apart from the suggested vista protection from Adelaide Road/Bridge St South towards Martindale and the Gawler East escarpment [2 storey limit for Southern Hotel locality shown in Draft Plan page 91 and Appendices page 123 there are no other definite proposals there is no significant protection proposed for existing vistas and the loss of many of them with proposed buildings height changes.

There is commentary on Page 121 of the Appendices document about vistas but it is not followed up with criteria other than think about it, which does not inspire confidence. "Views to landmarks and key heritage buildings should be managed carefully."[Appendices page 41 of 146] firstly is useless for the majority of "non-key" heritage buildings and is more a bit vague and easily ignored unless there are some relevant requirements in subzone policies for example.

Proposed height limits

The map on Draft page 4 and more detailed maps on pages 44-48 shows visually what may occur with layers showing storeys but not that easy to follow. The coloured map appearing in some explanatory Fact sheets and on Draft page 91 is very hard to understand because of shades of blue. East Murray Street at first glance looks like 3 storey colour – turns out this is 4 storey. Easier to see is Draft page 87 which numbers each colour block. A map like this should be upfront - not be found at the end of a long document and missing from Facts Sheets.

Central area. Draft maps page 4 and 44-47. Rezoning is proposed to allow buildings up to 4 storeys on Murray St east, 5 storeys on Murray St west, up to 3 storeys east of High St and on the Bakers cottage Reid St car park and shelter area, up to 5 storeys along Julian Tce , up to 5 storeys at Woolworths and Coles sites and Gawler Central station car park, and generally 4 storeys elsewhere. There are frontage setbacks usually above 2 storeys in Murray St and 3 storeys on Julian Tce.

North of Gawler Central rail line – appears to retain Guideline 2 storey apart from station car park [4 storey]. Maps Page 4 and Page 44.

Adelaide Road generally Guideline of 3 storey limit – see Page 4 and Page 48.

Note. The above maps contain some inaccuracies in relation to heritage listed places and often don't show the places listed as Representative places [formerly Contributory places] which have significance as part of the Planning Code Heritage Overlay. In some places there are multi-storey building options shown all across Representative places. Representative Places are shown on Appendices Map page 123 – but again note discrepancies – e. g. former Gawler South Council office not shown here at all.

Assessment of potential additional development in Draft Plan

Without giving much detail of the parameters and assumptions involved Jensen produce the following suggested outcomes after 25-30 years. – See Draft Page 28

Space demand next 20-30 years	
Retail	16,000
Office	4 to 9,000
Healthcare	2 to 4,000
Accommodation	2,500

Cinemas 1, 2	2 to 4,000
Comm/Library	2,000
Total say	32,000
Additional car parking – not sure how this fits – depends on site design. 880 parks mentioned need to be fitted on sites.	
Residential 200 apartments	
Jensen say 150-200 sqm each. 150-200 sqm is way too high. Harvey near Gawler Station is about 117 sqm and well spread. For town centre allow 100, could be smaller. Ordinary houses in Europe are about this size.	20,000
Total	52,000

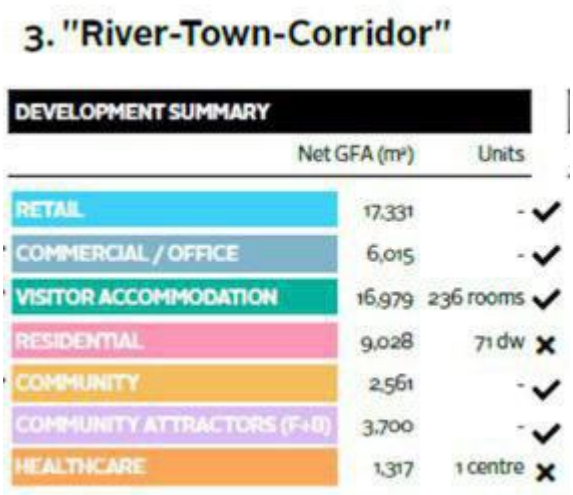
Again, without giving detail of the parameters and assumptions involved, Jensen produce the following suggested outcomes of 4 scenarios that were assessed. {Appendices page 110 of 146]





Total c 16,700 sqm

Total c 34,000 sqm





Total c 55,000 sqm

Total c 75,000 sqm

Jensen conclusions from above – page 33.

"The following observations were made from the testing:

- _ Gawler Town Centre can accommodate future land use demand to 2046 and beyond.
- _ Only larger scenarios with many sites included can meet land use demand.
- _ Not all sites will be developed in next 20-30 years, and we can't predict which will / will not. Allow flexibility in planning.
- _ At least one expanded (or new) shopping centre is needed. Allow flexibility regarding which centre(s) expands.
- _ Building heights up to 5 storeys will help achieve the targets – rezoning required. Include design policies for good urban design and heritage outcomes."

One of the assumptions in the Draft Plan as above is that some major new shopping area is needed like a Kmart. If we have 4 big supermarkets plus Big W and Target why would we "need" more.

We see this opaque analysis as essentially self-serving to justify major development in the Town Centre. Where is the assessment of traffic implications and management of extra traffic? Where is the assessment about how to improve smaller town centre sites which need improvement?

Over the years we have had several town centre studies which provided more detailed assessment of potential changes. In particular the Bechervaise & Associates Murray Street Main Street Study (1989) provided some detailed assessment of ways of protecting and improving the viability and appearance of businesses in Murray Street. We would suggest work like this needs to be done rather than just looking at the big picture opportunities that will suit big developers.

Over the top development potential unleashed in Draft Plan.

The Plan suggests development opportunities that could have the Town Centre multiple time bigger than it is now – astonishing. Starting with the 20 priority sites on Draft page 19.

Sites	1-20 on page 19	Site area	Storeys suggested
1	Parkland area [no separate title, river parklands- see p	7,100	up to 4
	SA Water separate title	3,350	up to 4
2	MFS, Ambulance Main west lot - F217163 A120 no title	4,450	up to 4
	East lot - separate title William Paxton ex 1849	2,750	up to 4
3	Mill complex	5,900	up to 5
4	Caltex fuel station	2,000	up to 5
5	Café Nova, Kindergarten, house	4150	up to 4
6	Steinborner car yard and service centre	4350	up to 5
7	Steinborner car yard	1,650	up to 4
8	Phoenix Plaza	14,200	up to 4
9	Motor vehicle businesses BP, T-mart etc	4,300	up to 5
10	New Development area Ginos	2,900	up to 4
11	Post Office plus Council carpark	2,800	up to 5
12	Victory Square	3,100	up to 4
13	Residential yards on High St	1,400	up to 3
14	Woolworths Big W	16,800	up to 5
15	Cash Converters	1600	up to 4
16	Council Admin carpark	3800	up to 4
17	Woolworths car park Finniss St	1700	up to 5
18	Coles complex	18,000	up to 5

19	Gawler Central train car park	2,700	up to 4
20	Gawler South triangle	3,000	up to 3
	Total footprint	**112,000**	

Total extra floor space achievable [allowing for existing buildings and existing and new car parking] could be double or more the existing total footprint of these sites – i.e. over 200,000 sqm. If underground car parking were implemented then the floor space achievable would increase accordingly.

Next looking at other main town centre sites shown for development but not Page 19 Priority Sites.

Not shown as priority sites on page 19 - usually part lots	**Site area**	**Storeys suggested**
Council Administration centre building area	2,800	up to 4
Visitor Centre and carpark - status not clear – possible 2100 sqm		
Drakes	7,650	up to 4
Aldi	5,050	up to 5
Murray St 2 blocks opposite Coles	2300	up to 4
Sportspower Corner Cowan/Murray	1000	up to 4
Back of Piles buildings 2 sites	800	up to 4
Corner Lyndoch Murray N side	300	up to 4
Fasta Pasta	3000	up to 4
Murray St Lyndoch Rd to ANZ Bank area	5700	up to 4
Finniss St, Commercial Lane, Jacob Lane block behind Murray St	4500	up to 4
Jacob Lane to Tod St rear of buildings	4500	up to 4
Tod St to Walker Place rear of buildings	1500	up to 4
Walker Place to Kingsford rear of buildings	2500	up to 4
Cinema area	4000	up to 4
Dan Murphys west side of church	1500	up to 5
Reid St carpark excluding Bakers cottage shelter	1500	up to 3
Total footprint	**48,600**	

Total extra floor space achievable [allowing for existing buildings and existing and new car parking] again could be double or more the overall footprint – i.e. maybe extra 100,000 sqm. If underground car parking were implemented then the floor space achievable would increase accordingly.

Plus Adelaide Road area

Not shown as priority sites on page 19 - usually part lots	**Site area**	**Storeys suggested**
8 7th St office complex outside Open Space Zone	2700	up to 3
Adelaide Rd east side heading south		
Adelaide Rd StVdeP area	1800	up to 3
Rear yards facing Water lane	1000	up to 3
More rear yards to Water lane	1800	up to 3
Car Parts site etc	1000	up to 3
Back of house	500	up to 3

McDonalds	2600	up to 3
Car wash	800	up to 3
		up to 3
Adelaide Rd west side heading south		up to 3
10th St podiatrist	400	up to 3
Mitre 10	4600	up to 3
Several sites Bunyip office area	2800	up to 3
KFC	2300	up to 3
Total	**22300**	

Development on fringe of Adelaide Road town centre area.

New 10 7th St Medical Centre can probably be added in since it has defacto been treated as part of zone now. Area outside Open Space Zone - 2700 sqm making total 25,000.

If underground car parking were implemented then the floor space achievable would increase accordingly – not likely here except perhaps Mitre 10 site.

Total extra floor space achievable [allowing for existing buildings and existing and new car parking] likely to exceed 25,000 sqm.

Adding above - total additional floor space in Jensen Draft could be in order of 350,000 sqm.

Compare this to bigger commercial centres in northern metro area:

Smithfield encompassing the Munno Para Shopping Centre c. 30,000 sqm c. 1800 car parks

Elizabeth City Centre and the Prince Charles Street precinct c. 80,000 sqm. c. 3,000 car parks

Modbury Precinct, largely Tea Tree Plaza area c. 120,000 4,200 car parks – c. 1200 park n ride

Salisbury – Parabanks and Hollywood Plaza c 50,000 sqm c. 2500 car parks

These figures for nearby centres are AI generated so not vouching for accuracy.

GREAT NEWS – GAWLER TOWN CENTRE COULD BE BIGGER THAN MOST OF THESE PUT TOGETHER.

"Heart of the Region"

This is the sort of civic pride and business marketing presentation that needs to be carefully examined. The Draft has a priority for Gawler Town Centre to retain its leading place as a regional commercial centre – always popular when trying to get support of Council and locals.

Reality - apart from the centres at Munno Para and Elizabeth there is no way that new centres in Springwood, Evanston Park, Concordia, Roseworthy, Virginia or Two Wells will have anything like the size and complexity of current Gawler Town Centre even without significant future expansion in Gawler. There is no way that current Gawler Town Centre will not remain "Heart of the region".

Zoning changes proposed

Proposed Urban Activity Centre Zone – page 85-88

D O 1 A cohesive and legible environment supporting a broad spectrum of regional level business, shopping, entertainment and recreational facilities that can cater for large crowds, smaller social gatherings and events over extended hours.

D O 2 Primary business, shopping and entertaining areas are integrated with public transport facilities, pedestrian and cycling networks, and community transport infrastructure, and designed to enhance the quality of the public realm.

This is the zoning for other larger centres at Munno Para, Elizabeth, Modbury and Parabanks. Hollywood is Suburban Activity Centre Zone.

The Munno Para area has recently had a significant change to suggested maximum building heights.

The Smithfield Regeneration Code Amendment has been finalised and adopted by the Minister for Planning. A number of changes were made to the code amendment following consultation, including:

- *applying a maximum building height of 15 storeys across the Renewal SA site and the 'Urban Activity Centre Zone', which includes the Munno Para Shopping Centre, Smithfield railway station and bus interchange, and other private and public properties*
- *applying a maximum building height of 9 levels across Lot 19 Morialta Drive*
- *applying a maximum building height of 6 levels across the existing residential areas to the north and south of the Renewal SA site*

While this 6 – 15 storeys might appeal to the state government and the rather beleaguered Playford Council, those sort of building height limits are entirely out if we want Gawler Town Centre to retain its appeal.

By comparison also, the Concordia apparently has a 2 storey 9 metre limit for commercial centre and potentially 3 storey residential development [which can produce similar to 9 metre heights] in its centre.

It seems to be the case that an Urban Activity Centre Zone can have significant limits on built heights – e.g. Port Adelaide seems to have a suggested 11 metre height limit.

But equally the current Township Main Street Zone could have provision that maintain existing height limits but carefully described when heights above 2 storey 8-10 metres could be assessed if that is desired e.g. sites identified via topography such as the lower level of the Coles site if impacts were otherwise acceptable. Equally storeys can be layered up a slope without adding extra storeys. That is the sort of change we could support. The Draft Plan should examine how an option for minor variations of the existing height limits could work rather than chasing the massive opening up for future development proposed. Letting "the market" decide these issues is in reality letting major developers decide Gawler's future.

Gawler Town Centre Subzone

The proposal for a Gawler Town Centre Subzone is fully supported. This can re-introduce similar provisions as were previously in the Gawler Development Plan pre 2021 to deal with the specific requirements for Gawler, including heritage and historic character protection. Also setbacks, green space, overshadowing, retention of vistas, undercover/underground car parking etc as set out in the Draft – noting that removal of higher storeys will remove or reduce the need for some. General disaster when the Planning Code introduced one size fits all zoning provisions needs to be reversed.

Urban Corridor (Living) Zone as proposed for Adelaide Road Page 89

> *Zone outcome wording related to Code. This zone supports the development of high-intensity, vibrant, mixed-use corridors which include a variety of new housing choices along with a range of complementary retail and commercial activities. Development will generally have a greater proportion of housing than retail or commercial activities. Non-residential forms of development will typically be located on ground and lower building levels. Where it applies Adjacent a number of main road corridors where new housing is envisaged above non-residential uses (e.g. Fullarton Road, Anzac Highway, Henley Beach Road, Prospect Road and Lower North East Road).*

It is simply inappropriate to have a zoning as exists for the roads listed here [Fullarton Road, Anzac Highway, Henley Beach Road, Prospect Road and Lower North East Road]. The current zoning with an added Subzone with more detailed policies would be best for Adelaide Road.

Representative Places

One of the changes that a Zone/Subzone should bring in is to list and have a map for the Representative [former Contributory] places in each zone/subzone. It is extremely unhelpful to have to refer to separate on-line maps for this information - maps which currently have mistakes. For example, on Adelaide Road the former Gawler South Council office is shown on the wrong title – it is the adjacent title. If the places are listed this problem can be rectified. Then the Heritage Overlay referring to historic buildings etc can do the work it is intended to do. In addition to the 66 State and Local Heritage Places in the current town centre there are 51 Representative Places on our count.

We note that the partial Phillips Pilkington Map on page 31 of 94 of the Draft does show Representative Places in pink/red. Also the map on Page 123 of 146 in Appendices. The Map on page 8 Phillips Pilkington Background_Study_Part_1 contains a full depiction of Representative heritage places. Excerpts from Phillips Pilkington Background Study:

> *The aim of this study is to inform any redevelopment work to existing Heritage Places, together with Representative Buildings and also development of existing and proposed infill buildings within Gawler's Town Centre.* **Page 5** Phillips Pilkington Background_Study_-_Built_Heritage_and_Adaptive_Reuse_Analysis_opt_-_Part_1
>
> *Practice Guideline 3 of the State Planning Commission provides guidance on how representative buildings are to be considered in the assessment of development applications.* **Page 5** Phillips Pilkington Background_Study_Part_1

Representative Places should be on all relevant maps for the Plan. Noting at least one error in the State Government mapping – the former Gawler South Council office Local Heritage Place is shown on the adjacent block. The mapped numbers for Representative Places could usefully be added. We also note 1 omission for the Representative Places – the Albion Mill millstone. This millstone could have been a Local Heritage Place in 2020 update if it had hadn't "disappeared" See Appendix 2.

Priority Sites 1 and 2 on Page 19

While on zoning – the current Draft proposes to rezone the area of original park land at the south end of Murray Street to town centre – areas marked as Priority Sites 1 and 2 on Page 19 and elsewhere.

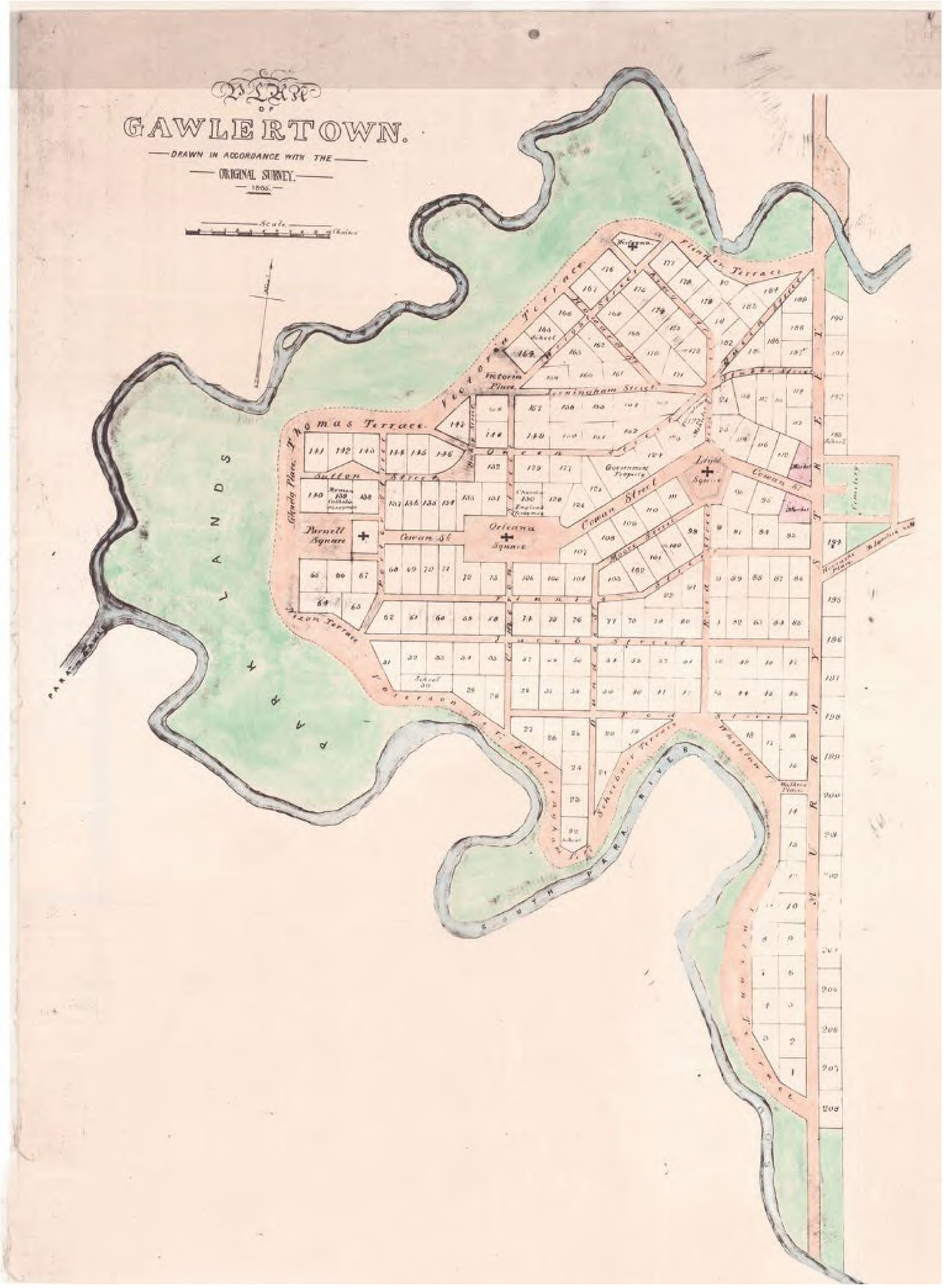


Figure 1. Original town park lands 1839 Light Finniss & Co plan shown in green



Figure 1. Original park lands with added land now recorded as "Limited Certificate of Title - Volume 6085 Folio 777" as below – shown as the parcel related to FP 163065 in next figure.

This change followed the 1849 subdivision of land described as "Gawler East". The land was owned by William Paxton. It appears the land was intended to become part of town park lands as shown in Figure 2 above but the title was never transferred.

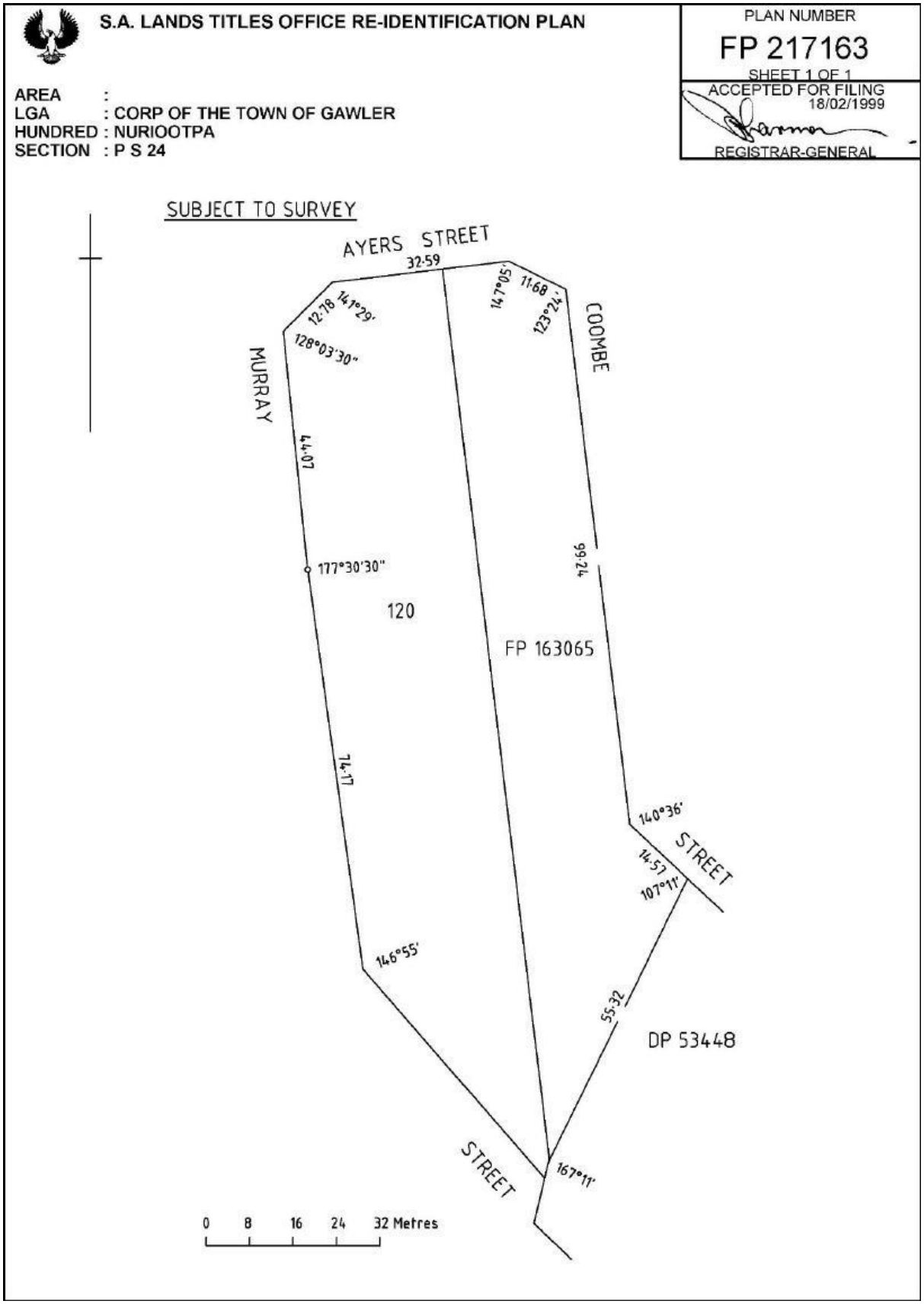


Figure 3. Plan showing both the parcels of land comprising Priority Site 2 on Page 19.

The Registrar-General certifies that this Title Register Search displays the reco
maintained in the Register Book and other notations at the time of searching.

Limited Certificate of Title - Volume 6085 Folio 777

Parent Title(s) LT H/167
Creating Dealing(s) RT 11627736
Title Issued 24/10/2011 **Edition** 1 **Edition Issued** 24/10/2011

Estate Type

FEE SIMPLE

Registered Proprietor

WILLIAM PAXTON OF ADELAIDE SA 5000

Description of Land

ALLOTMENT 96 FILED PLAN 163065 IN THE AREA NAMED GAWLER HUNDRED OF NURIOOTPA

Conditions

THIS TITLE IS LIMITED AS TO DESCRIPTION OF LAND AND TITLE REFER SEARCH NO. 2421

Easements NIL

Schedule of Dealings NIL

Notations

Dealings Affecting Title NIL

Priority Notices NIL

Notations on Plan NIL

Registrar-General's Notes
FOR INFORMATION PURPOSES ONLY FX261581

Administrative Interests NIL

Limited Certificate of Title

Title Reference: CT 6085/777
Status: CURRENT
Parent Title(s): LT H/167
Dealing(s) Creating Title: RT 11627736
Title Issued: 24/10/2011
Edition: 1

Figure 4 Land title for western parcel of Site 2. Owner William Paxton from 1849.

The land shown as Sites 1 and site 2 on Draft Plan page 19 should remain outside the Town Centre Zone. The Site 1 Green Parcel is Gawler Park lands and has been since 1839. **It is also subject to flooding**. The SA Water land was used for a government well c. 1880 placed on the park lands because that gave easy access to underground water. The site still contains within the main building the original c 1880 well and is a State Heritage Place. Also at least in part likely to flood. No need for development.

Site 2. There is no Certificate of Title for the Lot marked 20 in Figure 3. The parcel should have been part of CT/5985/685 which was the parcel comprising all remaining original town park lands from the 1839 Gawler town survey. This land was held originally by Trustees for the original Gawler Special Survey owners. The arrangement was not working and in 1864 Gawler Council obtained an order from the SA Supreme Court appointing 2 councillors as replacement trustees. The history since then is rather opaque but Council did not have powers to do anything with the land apart from park lands or roads until the Local Government Act was changed in relation to land held on trust.

The original dealing with the land by Gawler Council in the late 1990s involved Council doing a "land swap" with the Metropolitan Fire Service whereby Council obtained land in Jacob St that comprised the MFS station in exchange for some purported lease of Site 1 to MFS. Council undertook the very doubtful arrangement to assist with Woolworths acquiring land for their supermarket/Big W project. [Later Woolworths dudded Council of about $200,000 for footpath improvements around the Supermarket site when the land under the supermarket site was on-sold and the agreement with Woolworths apparently became difficult to enforce]. Later also the St Johns Ambulance moved onto the Site 2 under some other similar doubtful arrangement. Having now obtained title information, including Mr Paxton being owner of part, it is still not clear what the legal situation is with the land. Regardless it is not appropriate that the land should be rezoned into the Town Centre.

Traffic proposed changes – general analysis

There does not appear to be a useful or comprehensive assessment of traffic impacts of the proposed major expansion of activity in the town centre. There must be.

Proposed general traffic changes

The change to re-route traffic in Light Square is the most problematic – see page 86 of 146 Appendices. Consultants are correct to an extent in saying that separating Light Square from the general Church Hill State Heritage Area because of the existing traffic flow is an issue. However there are also difficulties with the suggested change – particularly managing traffic in and out of the Coles site with the much shortened and less visible approach to the current Coles entry for vehicles following the Reid Street to Cowan Street movement and potential for a lot of banking up of traffic.

Making High Street a one way south from Lyndoch Road to Calton Road may be worth a try but it will redirect more traffic through residential streets especially Daly East Terrace and Cheek.

Tod Street - needs some more detailed thinking. One of the diagrams prevents 2-way access into the NAB/Council car park on the south side – that cannot be workable.

40 kph along parts of Murray St and High St [page 93 and ?] is good.

Public transport

One of the answers to traffic in the town centre is a much smarter public transport. The current very circuitous bus routes need to change. Having a very regular shuttle bus between Gawler Central and Gawler stations along Murray St and Adelaide Road could be very beneficial. Combine that with shorter out and back routes Willaston/Hewett to Gawler Central station, Gawler East to Gawler Central station, Evanston Park to Gawler Station and Gawler West/Hillier/Evanston Gardens to Gawler Station [and probably Tambelin] are worth investigating.

Having a shuttle train service from east of Gawler [Concordia, Lyndoch, Tanunda?] to Murray Street is also worth investigating properly. Options for grade- separation at Murray St seem too expensive and also having major potential negative impacts on entry/exit view into and out of Murray Street.

Set backs

The setbacks along Murray St are useful work although not much needed if building height is mainly limited to 2 storey. Other setbacks also need more attention. The example shown here of an apparently 4 storey building at rear of Piles Building and adjacent Finniss St has problems. Allowing new buildings too close to the rear of heritage buildings blocks views of the very interesting details of the rear areas. That is an issue especially with State Heritage Places like Piles buildings.

Not having setbacks off side streets such as Finniss St as shown below also has potential to impact historic character as well as creating too much shade. Having general instructions in a Plan for thinking about the issues doesn't seem very helpful in the development assessment process currently – some definite rules and guidelines are needed.



Consultants indicative view of potential development. Not a good look. The upper levels of this building and similar will be plainly visible from areas other than Murray St – in this case from Pioneer Park, Finniss St and other vista places such as High St and parts of Church Hill.

Clock tower view

There are some images in the Draft showing how views of the clock tower can be preserved. Not much of a problem if heights remain as now.

Two concerns with the Draft – the height of the clock tower seems to be higher in the images than actual. The top of tower is about 15-16 metres with the clock face down 2-3 metres below that. The images look like it is being represented as about 2 metres taller than it actually is.

Over-shadowing – solar access

Only Murray St and High St looked at – easy on NS streets – need to look at east-west streets. Overshadowing is a major concern with infill and taller buildings. As with setback comments above, there doesn't seem to be appropriate analysis of overshadowing in east west streets such as Finniss Street. The image above for rear of Piles building would produce high levels of shade in Finniss St during winter which is not desirable. This overshadowing also affects ability to landscape the east west streets.

Page 43 of 146 Appendices Development since 2017

Since 2017 there have been only 16 developments with construction costs >$100,000.

This page produces an incorrect impression of significant development in recent years. How about a more general collection of significant development? It seems the data might relate to new development applications not delayed or ongoing ones. Misleading picture.

Missing [$ figures are only estimates or guesstimates]

- 1 Light Square Medical – this whole project only recently opened would have cost $2m plus? – only figure quoted relates to rebuilding of heritage barn and some other minor work.
- Whole of Civic Centre, Council Admin Centre – total about $15m
- Old Spot Hotel Murray St – not shown – major money – a few million?
- New Car repair place corner High St and Lyndoch Rd
- Exchange Hotel – only a canopy cost shown. Big redevelopment not too long ago.
- Dan Murphys no mention – bit over 10 years?
- 10 7th St – Eye/medical centre – just on edge of Town Centre Zone - should be included $2m or so?
- Several developments on Adelaide road south of the TC Zone. Taylor & Forgie major one - $1m plus? And other smaller ones – after Council planners decided that residential zone didn't mean much and pretty much any commercial development could be serving the "local" population.

Residential separation

The proposal for 3 storey development in the car park – Bakers park reserve should be deleted and left as is. There is also a National Trust covenant over much of this land based on the land being transferred to Council by National Trust after historic Bakers Cottage was demolished by Council while still owned by national Trust. Seems unlikely to be development there.

Urban canopy

The Plan talks about Canopy and Green Space. This needs to be better explained. The definition of canopy is generally only plants taller than 3 metres. It is not helpful to ignore lawn and gardens which should be picked up as Green Space. For urban area in terms of heat reducing benefits, health benefits of cleaner air and general amenity lawn and gardens are often more beneficial than stand-alone trees without understorey plantings.

Alinea Retail & Commercial Market Analysis 2023 and David Snoswell Property Advisory November 2025 Gawler Town Centre Market Assessment

We have looked at these reports and don't find them at all convincing. We consider it appropriate that other existing and emerging town centres in the region should take all of the new "big box" commercial development in future. That will assist with analysis of traffic expansion associated with proposed new development which generally seems to have been ignored.

Town Centre subzone and planning/heritage policies

We would recommend looking at the policies contained in the Town Centre Historic Conservation Zone which applied for the town centre area from 2000-2021. Added to this could be some of the Phillips Pilkington proposals in their work for this Draft Plan – minus the parts which are associated with expanding height levels above 2 storey/8-10 metres – although some of these could be modified to be useful for lower scale development.

It is unfortunate that the whole of the original 1839 Light plan for Gawlertown was not made a State Heritage Area in thew 1980s when this was considered. The adoption of the National Trust SA nomination of the "Gawler Conservation Area" [essentially the 1830 plan area including High St addition] onto the Register of the National Estate – accepted in 1980 for a State Heritage Area would have given Gawler as SA's first and most significant early country town its appropriate recognition.

154 Murray Street redevelopment.

We have been watching closely the work to restore this State Heritage listed property. We see the project to convert this previous single use commercial property into 2 residential apartments and one or possibly commercial places [counting the underground basement area] plus the historic shed fronting Commercial Lane as an ideal prototype for quite a few existing 2 storey places in Murray Street. Re-establishing residential use in the town centre is a key to many of the goals to activate the town centre with more diverse activities that are part of Gawler's Community Plan as well as the Draft Structure Plan.

For related information, Appendix 3 contains information about conversion of a commercial property in Mount Gambier from ABC News 2 July 2026

Incentives and Council assistance

We would argue strongly for a mixture of incentives and disincentives to assist with appropriate restoration of heritage properties in the town centre. Heritage guided restoration is vital to maintain town centre character and commercial appeal. The Council policy of refusing rate rebates for commercial properties that are neglected has been effective – Petite Pear is now operating in one of these sites after change of ownership and excellent restoration work.

Council incentives can look at a number of ways to assist - via discretionary rate rebates or grants, car parking levy variation for restoration projects, and assistance via Council staff including new commercial promotion officer and help with getting grants from elsewhere are all ways in which smaller operators can get the confidence to undertake projects that will significantly benefit broader community goals.

Thank you for Council assistance with provision of information, having a representative on the Reference Group, the street walk/talk activity and extending submission time.

We look forward to being able to present discussion and respond to other submissions at a future Council or Community meeting.

Kind regards

[redacted]

Convenor, Gawler Environment and Heritage Association

Attached.

Appendix 1

Vistas around town centre photographs compiled June 2026. Including some examples of inappropriate street frontages.

Appendix 2

Coles site Albion Mill millstone information.

Appendix 3

Recent ABC news article on Mount Gambier conversion of former commercial building for residential use.

Appendix 1 – Vistas around Gawler main Town Centre area. On a circuit from Light Square Moore St Finniss St Reid St, Tod St, Julian Terrace, Bridge St South, Murray St southern end, Ayers St, High St southern end, Calton Rd, Martindale off Duffield St, High St northern end, Lyndoch Rd, Pioneer Park to Light Square. Higher new buildings behind heritage buildings will be obvious from many places.



1 Light Square over Coles River Red Gums and Gawler East trees etc. Taken in poor light.



2 Light Square over Coles Gawler East trees etc



3 Light Square Cowan Street and part over Coles



4 Light Square over Woolworths Riggs Hill Road, Gawler East



5 Light Square over Woolworths Martindale, Pine Lodge [Grand Views] Gawler East. Big Red Gum



6 Light Square Reid Street over Bakers Cottage park, Drakes South Para trees



7 Moore St south Drakes, Uniting Church



8 Moore Street between houses Clock tower Martindale, Pine Lodge



9 Dundas Finniss St Lutheran Church yard South Para trees Gawler East Escarpment



10 Julian Terrace over Drakes Church Hill



11 Julian Terrace closer up over Drakes Church Hill St Georges Church, Lutheran Church



12 Julian Terrace Tod Street over car park in part– the magnificent three plus National Bank.



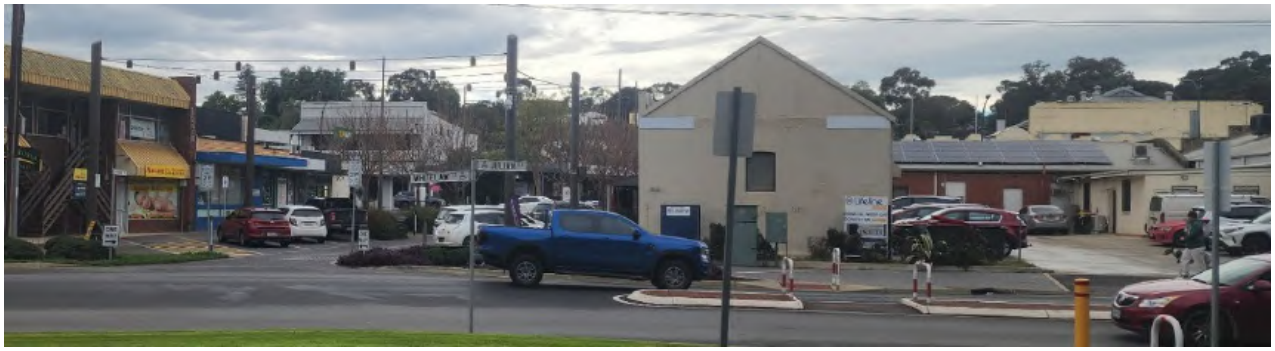
13 Julian Terrace Tod Street over car park Institute Town Hall National Bank and Neds



14 Tod Street Post Office River Moreton Bay Figs and Red Gums



15 Julian Terrace Clock Tower Martindale Pine Lodge native pine trees



16 Julian Terrace Old Spot/Golden Fleece James Martin Shed Ozone Theatre



17 Julian Terrace James Martin Shed Institute



18 Julian Terrace James Martin Shed Ozone Theatre Clock Tower



19 Julian Terrace Kingsford Hotel Clock Tower Martindale



20 Julian Terrace Kingsford Hotel Clock Tower Rear of heritage buildings



21 Julian Terrace Kingsford Hotel Martindale Ex BankSA



22 Julian Terrace Ex BankSA, Rudalls chimney Escarpment trees



23 Julian Terrace Rudalls Escarpment trees



24 Bridge Street South – propose protected view over Southern Hotel to Martindale



25 Bridge Street South entering Murray St –Southern Hotel, Rudalls, Petite Pear, ex BankSA



26 Murray Street south Theatre Escarpment trees



27 Murray Street South towards escarpment Heritage cottage, Mars Hill



28 Murray Street south across Caltex Baptist Church Moreton Bay Figs and South Para Red Gums



29 Murray Street South looking SE south end of Mill site, South Para Red Gums, Sugar Gums



30 Murray St Moreton Bay Figs c 20m high behind Steinborner



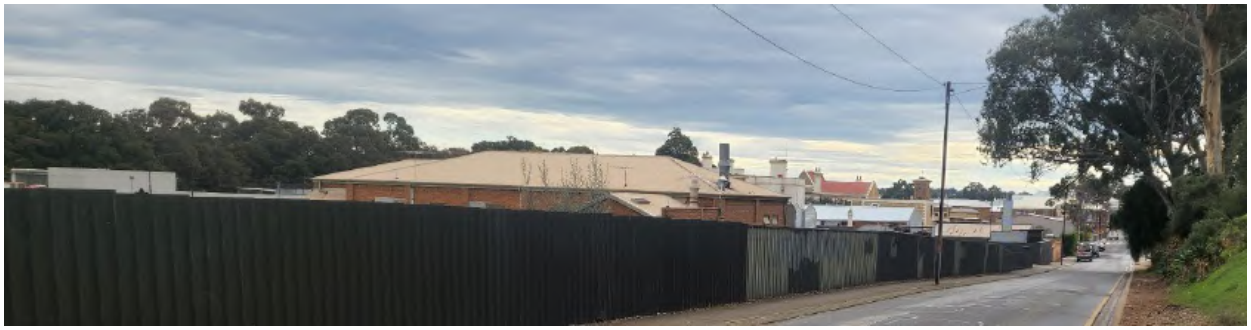
31 High Street heritage cottages Mill and Julian Terrace trees



32 High Street heritage cottage Mill and Julian Terrace trees



33 High Street Mill and Julian Terrace trees



34 High Street Julian Terrace trees Café Nova ex BankSA, Rudalls



35 High Street Julian Terrace trees ex BankSA ex Munno Para East Council office



36 High Street Clock tower ex Post Office, Oddfellows Hall, smaller heritage building, Ozone Theatre Julian Terrace trees



37 From Martindale yard Phoenix car park Views of town centre Julian Terrace trees and across to Church Hill



38 From Martindale stairs – view across town centre



39 From Martindale yard Views of Bridge Street south entrance – reverse of proposed protected vista – see Draft Plan page 92 and Appendices page 123 Mill southern town centre Julian Terrace trees



40 From Martindale yard Views of Phoenix Centre Bridge Street south entrance Mill ex Baptist Church southern town centre Julian Terrace trees



41 From Martindale yard Views of Phoenix Centre Clock Tower southern town centre Julian Terrace trees



42 Calton Road entrance to Murray St. Phoenix Foundry Julian Terrace trees



43 High Street Clock tower Ozone Theatre Julian Terrace trees



44 High Street yard Rear Old Spot/Golden Fleece Julian Terrace trees



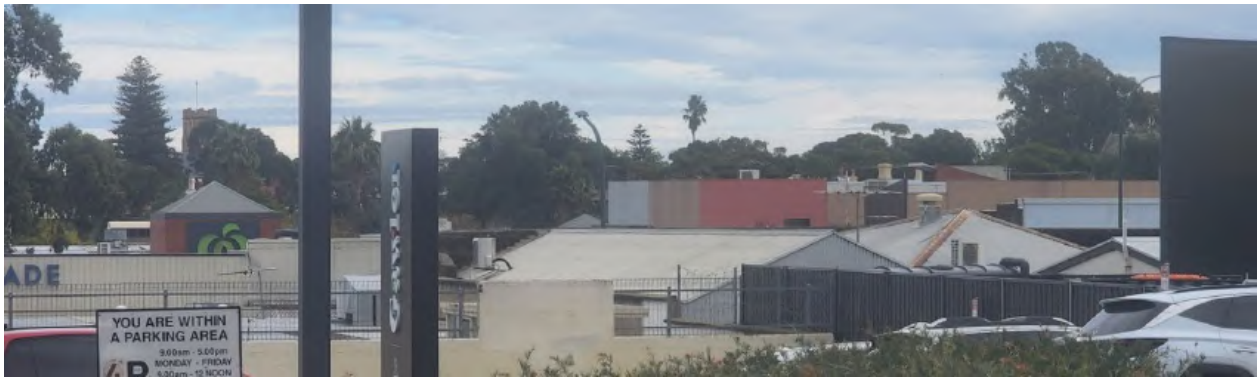
45 High Street historic rear views of buildings – PA Hotel, Restaurant, Crosbys across Murray St



46 High St looking south west Institute, ANZ Bank, National Bank



47 High St top of 2 storey Wilcox Buildings including Bunyip building - mostly hidden by Cash Converters facade



48 High Street yard Council car park across Woolworths Wilcox Building Julian Terrace Church Hill trees Big Red Gum right hand side



49 High Street yard Council car park across Woolworths South end of Piles buildings Julian Terrace trees Big Red Gum



50 Lyndoch Road looking to Murray St – River Red Gum tree, South Para/Julian Tce trees, Uniting Church



51 Lyndoch Road looking to Murray St [closer] – River Red Gum tree, South Para/Julian Tce trees, Uniting Church



52 Pioneer Park car park area. Exchange balcony Piles building, St Georges tower, Congregational Church Light Sq.



53 Pioneer Exchange Hotel Park Piles building, Exchange Hotel shed



54 Pioneer Park Presbyterian Church Old Bushman trees



55 Pioneer Park across Coles site trees including North Para Red Gums Arbor Day Sugar Gums

Not good frontages on Julian Terrace. The battle for appropriate development.



56 Woolworths – Reid St - blocking off Jacob St - part of the Light 1839 town plan removed. Approved Gawler Council 1999



57 Dan Murphys – Julian Tce approved by Gawler Council Assessment Panel 2015/6



58 Aldi Julian Tce 2025 approved by SA Planning Commission 2025

Appendix 2 Coles site millstone listing mystery

Gawler Heritage Survey 1998 — 9 Inventory of places including previous and current recommendations

No.	St no.	Address	Place	NT	1976	1979	1980	1982	1988	1995	SHR	other	1998
94	33	Cowan St	House	-	-	TS	66T	-	-	-	-	AA	A
95	35	Cowan St	House	-	-	TS	67T	-	-	-	-	AA	A
96	37-9	Cowan St	Attached houses	-	-	TS	68T	-	-	-	-	AA	A
97	49	Cowan St	House	-	-	TS	80T	-	-	-	-	AA	A
98	51	Cowan St	House	-	-	TS	81T	-	-	-	-	AA	A
99	55	Cowan St	House	-	-	TS	82T	-	-	-	-	AA	A
100	57	Cowan St	House	-	-	TS	83T	-	-	-	-	AA	A
101	59	Cowan St	House	-	-	TS	84T	-	-	-	-	AA	A
102	61	Cowan St	House	-	-	TS	85T	-	-	-	-	AA	A
103	lot 214	Cowan St	Millstone in Coles carpark	-	-	-	-	-	-	-	-	AA,AS	C

As above [extract from 1998 Gawler Heritage Survey, the Albion Mill millstone that was uncovered as part of excavations for the Coles development in the 1980s was recommended as a Contributory Place in the 1998 Danvers Gawler Heritage Study and subsequently included in the 2000 Heritage PARs that became part of the Gawler Development Plan.

At the time the owner of the Coles site put in an objection to the listing on the basis that did not believe there was millstone on their site. Our representative at the objection hearing was able to state the location of the millstone on the site and the owner's representative withdrew their objection. The listing was confirmed. Why it doesn't appear in the Gawler Development Plan version immediately preceding the Planning Code or current Planning Code listing is a mystery but there are known errors and mistakes do occur.

The millstone is still in the same place. Now seems a good chance to correct the omission. The millstone is on Lot F7306 A215 on the Coles site.

A similar correction occurred at some stage for the timber Gawler Central station building when its listing was missed.



Millstone from Albion Mill on Coles site



Plaque with millstone information 1980.

Appendix 3

ABC News article – minus the pictures.

Government looks at encouraging turning empty shops into regional housing

Josh Brine ABC South-east 2 July 2026

Melissa Amin and her partner bought a disused main street building and turned it into a living space

In short:

The SA government is pursuing a strategy of turning disused commercial spaces into housing in the regional city of Mount Gambier. A couple who have turned an old shop into an Airbnb say people enjoy inner-city living, even in the regions.

What's next?

A housing expert says, despite some opposition, increasing density will benefit regional towns. As small businesses along regional main streets close, there are calls to turn empty CBD premises into living spaces to ease pressure and diversify housing markets. In Mount Gambier, on SA's Limestone Coast, a number of shops have left the city's main street in recent years, but a new regional plan has suggested "adaptive re-use of existing buildings for new housing".

Melissa Amin and her partner bought a disused building on Commercial Street East, turning the top floor into a living space they make available as short-stay accommodation on Airbnb.

The space used to function as a dance hall. "It was originally built as a social club/dance hall and photography studio," she said. "There's been maybe a health food store downstairs, a sewing shop, potentially shoes. "It was a jack-of-all-trades this building in its previous life … As soon as we walked upstairs and saw the view, we knew that we wanted to make it accommodation."

Transforming the space took about 18 months. While Ms Amin and her family live on a rural property, she said there was plenty of appeal to regional CBD living. "I'd be quite happy to live here; that seems to be everyone's consensus when they're up here," she said.
"That central living, there is something about it that you can fall in love with too." Ms Amin's Airbnb overlooks Mount Gambier's Commercial Street.

Changing housing needs

As part of the Limestone Coast Regional Plan, the state government has flagged investigating opportunities for infill in towns across the region to provide higher-density housing options. The Adelaide University School of Management Dean, Andrew Beer, said there was not enough supply to meet current housing demands across regional Australia, let alone into the future.

Professor Andrew Beer says infill will improve regional communities. Professor Beer said more urban forms of housing, or housing based around main streets, were needed as the population ages. "You can actually generate more vibrant communities that provide both more housing, but also housing that is more fit for purpose for that particular stage of life," Professor Beer said.

He said many different people were moving to the country, and not all of them wanted a big house and block. "Increasingly there'll be people coming out of inner urban environments, who very much want the peace and quiet of a country town, but don't necessarily want to take on the challenge of a large property," he said.

Like many country towns, Mount Gambier has seen a number of businesses leave the main street. "By looking to diversify housing stock … you will see growth because new types of migrants will be attracted." Professor Beer said while there were challenges involved with retrofitting older commercial buildings for housing, it could save money and work. "You're probably going to save $200,000 just in infrastructure costs alone by not building on the fringe of a country town," he said.

Challenges to overcome

One of the challenges with infill efforts was often community sentiment. "There's pushback by some members of the community who are worried about relatively minor issues like car parking or change in land use or what it might mean for their rates," Professor Beer said. "These communities need to see that infill-type developments strengthen their country town, rather than weaken it.

Historic regional CBDs, like Mount Gambier's, were more dense before the invention of cars. "Many old country towns were built at quite high density around railway lines. "This is just returning to a different way of living and a different way in which we organise our towns and cities."

Ms Amin said she thought attitudes around higher-density housing were shifting. "It's not always everyone's dream to have the house and the block," she said. "They may want the low maintenance and the energy you can get from living in the middle of the city, and Mount Gambier's not any different."

SA Housing Minister Nick Champion said the push for more infill came out of public consultation, as more people looked to "age in place". Nick Champion says increasing regional housing supply is vital. "We're not forcing it on anybody, but it's something that's come out of the feedback that people need and want this housing," he said. "We just have to adopt a case-by-case scenario for each town as we go forward."

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Department for Environment and Water

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Dear Town of Gawler

Thank you for the opportunity to provide feedback on the draft Gawler Town Centre Structure Plan (the Structure Plan).

Heritage South Australia, within the Department for Environment and Water, acknowledges this important strategic project for the Town of Gawler over the next 10 – 20 years and notes the draft Structure Plan has been developed following extensive engagement undertaken in late 2025.

The Structure Plan establishes an appropriate framework for future development, while strengthening the Town of Gawler's heritage character, local identity, and function as a vibrant civic and community centre.

It is essential that any development impacting heritage within the area considers not only the physical design but also how the proposal should protect identified heritage values, enhance community life, and preserve the character of the place.

The Structure Plan recognises the heritage places/buildings within the subject area generally. However, it is important to note that is many instances proposed works to State Heritage Places are subject to an approval process that must be obtained prior to commencement.

Heritage South Australia is pleased to provide the following feedback and recommendations for your consideration, which are focussed on the retaining identified heritage values and the setting of the subject area.

- In Project (5) as referred to in the Structure Plan (page 72), it comprises a change in the streets pattern. It is recommended that a sufficient buffer distance from the roadway be provided to protect the heritage site's character and setting (Light Square and The Old Bushman's Hotel).

- Directing freight vehicle via Reid Street and Cowan Street, through the State Heritage Area, as an alternative to Murray Street requires further assessment and to be carefully designed to preserve the integrity and significance of the area's heritage fabric.

- It is noted that the Structure Plan does not clearly identify McKinlay Memorial and Pioneer Park as an area of focus in the Structure Plan. The urban features such as

street trees and paving along Murray Street should be integrated with the Pioneer Park Heritage Wall and McKinaly Memorial recognising these are important heritage elements.

- In improving shopfronts and displays as referred to in Project (1) (Page 54) the project should be mindful to ensure improvements do not dominate or unduly impact on the setting of the State Heritage Place.

- The Structure Plan appears to be missing details for the section from the intersection of Walker Place and Murray Street to the intersection of Bridge Street South and Murray Street. This section includes several Heritage Places; The former Gawler Post Office (Shops), National Trust Museum (former Gawler Telegraph Station), The Kingsford Hotel, Solicitors' Offices (former Bank of South Australia), and The Gawler Baptist Church. It would be useful to highlight the scale of change in this area and its reflection on adjacent Heritage Places.

- The Structure Plan identifies the location and total number of Heritage Places and buildings. However, greater emphasis could be placed on individually identifying each State Heritage Place and explicitly referencing its name within the Structure Plan. The 19 State Heritage Places that are included within the proposed Structure Plan of the subject area, constitute the foundational elements of heritage and play a critical role in defining its historical significance, character, and identity.

- The current precinct description in the Structure Plan does not clearly identify Light Square as one of the focal public squares and public realm. Despite its location within the Gawler Church Hill State Heritage Area, the square appears disconnected from the surrounding commercial development as a public space, limiting its visibility and significance as a public place within the area. It provides an opportunity to advance a key planning opportunity to promote placemaking and encourage the activation of community spaces, enhancing their social and cultural value.

- An adaptive reuse approach is essential to ensure the town centre does not become a museum-like setting. The Structure Plan suggested adaptive reuse and redevelopment of heritage places/buildings as a key opportunity to be applied along and around Murray Street, potentially subject to rezoning and specific urban design and architectural design policies. Whilst this is supported further information is required as the Structure Plan does not clearly identify the heritage places to which this approach would apply. Adaptive reuse enables heritage places to remain functional and relevant while preserving their cultural and architectural significance and the Structure Plan references this. Accommodating contemporary uses within existing places would contribute to urban regeneration of the heritage area, maintaining its distinctive character and sense of the place.

- Applying the Movement + Place approach to the framework supports historic urban environments where streets contribute significantly to the character and identity of the heritage area. The Structure Plan recognises the street as both a movement corridor and a destination, seeking to create a more vibrant, accessible, and attractive public space while preserving and enhancing heritage values. This approach supports economic activity, encourages walking and cycling, improves public realm quality, and strengthens the relationship between heritage places and the surrounding streetscape.

  The proposed activated pedestrian path that is proposed from Cowan Street to Gawler Central Station would create a vibrant pedestrian route, it will link the pedestrian movement from Cowan Street and establish a public space.

- New buildings adjacent to Gawler Central Station and along Murray Street and Cowan Street as referred to on Page 44, will need to be designed referencing the heritage values and setting of the adjacent Gawler Church Hill Heritage Area. Significant views and sightlines should be maintained.

- It is suggested that it may be better to include the State Heritage Place, Former Provincial Gas Company (later SA Gas Co) Gawler Gas Works, in the proposed Structure Plan as it will lay along the suggested boundary of the subject area (Southeast).

- It is considered essential to maintain the dominance of the State Heritage Places and strengthen their role as reference points through being key identifiable landmarks in the public space.

- Connections between key heritage places can be strengthened to show the strategic points into which the observer can enter, and which are the foci of other paths.

- Signage as indicated in Location 6 on page 78 should be designed to not dominate or unduly impact the setting of the adjacent State Heritage Place.

- Adequate seating, shading, lighting, and other amenities are essential components for accommodating pedestrians in outdoor spaces. These features can play a significant role in revitalising State Heritage Places and adjacent public spaces, enhancing its presentation within the urban context, reinforcing its prominence, and helping to preserve the character of heritage in the area. Any designed or installed streetscape elements should not dominate or unduly impact on the setting of the State Heritage Place.

- The street character is a key component in maintaining the overall identity of heritage in the area. It should be consistent with traditional streetscape. Historic streetscape elements, including kerbing, paving, lighting, and signage, should be retained, with any necessary replacements carried out on a like-for-like basis to preserve and reinforce the existing character of the place. The structure plan should be amended to ensure this is readily understood.

Heritage South Australia wishes the Town of Gawler all the best in finalising the draft Structure Plan.

For further information regarding any of the points raised above, please contact [redacted] Heritage South Australia, Department for Environment and Water at [redacted]

Yours sincerely

[redacted]

Department for Environment and Water

30 / 06 / 2026

LEYTON FUNDS

17 July 2026

Stacey Mills
Senior Strategic Planner
Town of Gawler
PO Box 130 GAWLER SA 5118

By Email: Stacey.Mills@gawler.sa.gov.au

Dear Stacey,

RE: RESPONSE TO DRAFT GAWLER TOWN CENTRE STRUCTURE PLAN

Wakefield Properties Gawler Pty Ltd ("Wakefield") is the owner of the **Gawler Central Shopping Centre**, located at the intersection of Murray Street, Cowan Street and King Street, Gawler. This submission is made on behalf of Wakefield in response to the **Draft Gawler Town Centre Structure Plan** ("the Structure Plan"), which was released by the Town of Gawler for public consultation in June 2026. As a significant landowner and long-term investor within the Gawler Town Centre, Wakefield welcomes the opportunity to provide comments on the Structure Plan and its proposed strategic direction for the future growth, development and revitalisation of the town centre.

The preparation of the Structure Plan is both timely and important in ensuring that the Gawler Town Centre is well positioned to respond to emerging opportunities and challenges associated with the significant population and employment growth forecast across Adelaide's northern growth corridor.

As a major consolidated landholding within the Town Centre and strategically located adjacent to the Gawler Central Railway Station, the Gawler Central Shopping Centre presents a significant opportunity to support the long-term growth, renewal and revitalisation of the Town Centre. The size, configuration and location of the site provide a range of opportunities that are unlikely to be replicated elsewhere within the centre.

The purpose of this submission is to express support for the Vision, Strategic Directions and Key Moves identified in the Draft Structure Plan, while recommending a number of refinements to ensure that the significant strategic opportunity presented by the Gawler Central Shopping Centre is appropriately recognised and enabled through the final Structure Plan.

1. Gawler Central Shopping Centre

The Gawler Central Shopping Centre has a site area of approximately 20,000m² and is currently occupied by a Coles supermarket, specialty retail shops and offices, supported by approximately 300 at-grade on-site car parking spaces. The existing shopping complex was constructed circa~ 1980, with more recent renovations and extensions, and contains approximately 6,300m² of gross leasable floor area (GLFA).

The free-standing building at 5 King Street is a single-storey Local Heritage listed building currently used as an office, with dedicated car parking accessed through the shopping centre car park.

Immediately north of the site is Gawler Central Railway Station, the terminus of the Adelaide–Gawler railway line. To the south, Cowan Street and Murray Street form key parts of the local movement network and provide access to frequent local bus services. Pioneer Park and Light Square are local parks located opposite the site.

The site generally falls from south to north, creating a change in level between the Murray Street and Cowan Street frontages and the northern part of the site adjacent to Gawler Central Railway Station.

Figure 1.1 illustrates the subject site and its immediate environs.

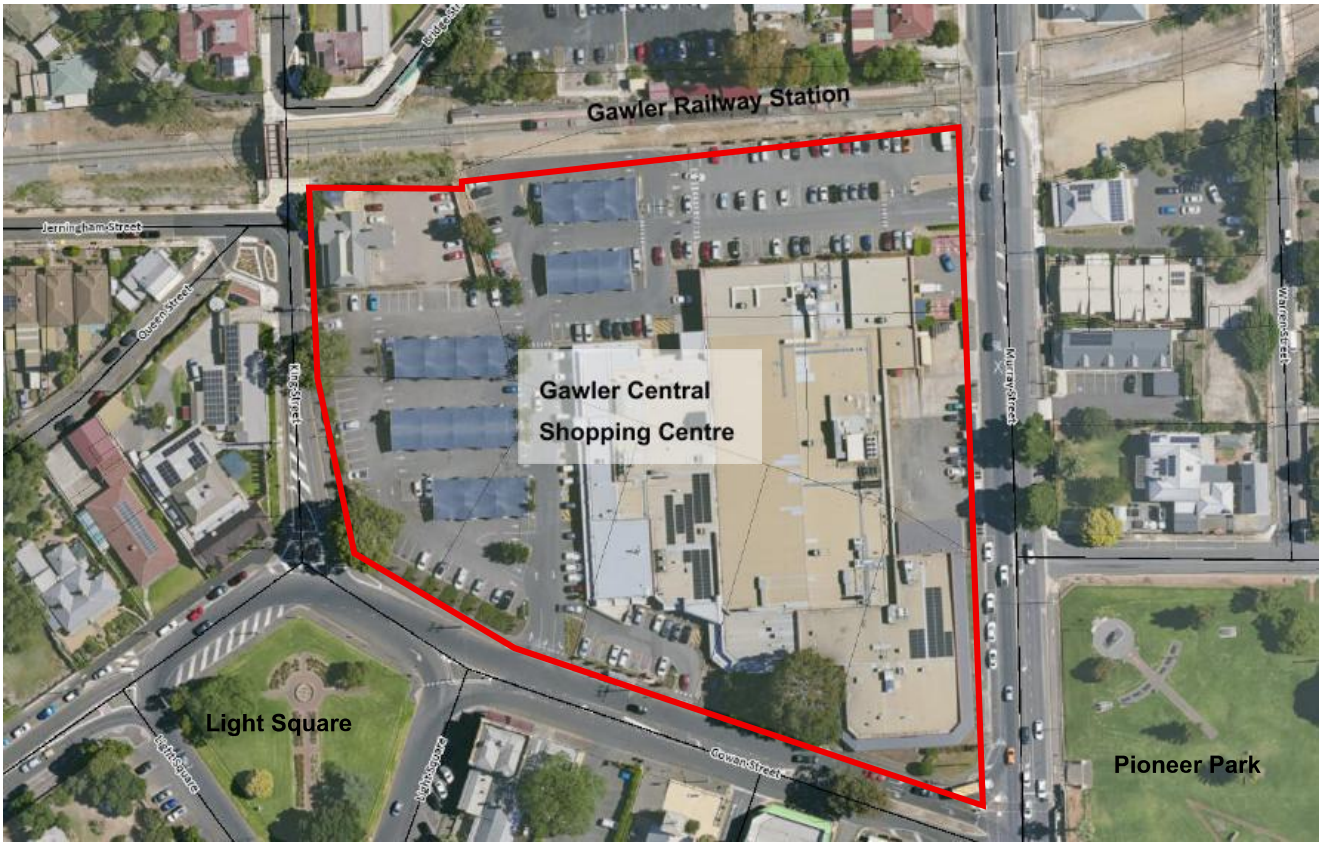


Figure 1-1 - Site Plan (Source: SAPPA)

2. Strategic Context

The Greater Adelaide Regional Plan (GARP) identifies Gawler Town Centre as a 'District Centre' serving the 'Outer North' of Greater Adelaide, an area identified as one of the fastest growing regions in South Australia, with projected annual growth of between 3.29% (medium growth scenario) and 4.53% (high growth scenario).

In this context, the Town Centre is expected to continue supporting a concentration of retail, commercial, community, civic, employment and transport functions for Gawler and its surrounding district. The broader Gawler area is also expected to experience continued growth, including through major growth fronts at Roseworthy, Concordia and Gawler East, which will increase demand for housing diversity, employment, services, retail activity and public transport connections.

The GARP also recognises this expected future growth, with Gawler and the surrounding areas identified as a 'Growth Area Mass Transit Investigation Area' and the existing rail corridor, including potential extensions to Concordia and Roseworthy, identified as 'Mass Transit Reserve Investigation Areas'.

As a large, consolidated landholding of approximately two (2) hectares, this creates a clear opportunity for the Gawler Central Shopping Centre to transition over time from a largely single-purpose retail and commercial use format to an integrated mixed-use and transit-oriented precinct that makes a much broader contribution to the future role, activity and growth of the Gawler Town Centre. This includes the potential to support medium to higher density housing in a highly accessible location, aligned with broader State and regional objectives to increase housing supply, housing diversity and activity around established centres and public transport infrastructure.

The site's physical characteristics further reinforce its strategic redevelopment potential. Multiple road frontages and separation from adjoining residential properties by public streets provide flexibility to achieve appropriate built form transitions, vehicle access arrangements and interface outcomes. In addition, the site's natural topography, which falls from south to north, presents opportunities to efficiently integrate built form, access and parking solutions. The level change across the site is particularly well suited to the incorporation of undercroft or partially concealed parking, enabling higher-intensity development while maintaining active frontages, reducing the extent and visual presence of at-grade parking, and supporting high-quality public realm and urban design outcomes.

3. Strategic Site Opportunity

The Draft Structure Plan has identified 20 strategic redevelopment sites across the Town Centre based on land size, ownership and current land use (or under use). Of the 20 sites identified, the 'Gawler Central Shopping Centre' site is one of two (2) existing supermarket centres that have been identified as opportunities to '*play a major role in a growing town centre*'.

The Gawler Railway Station Precinct is identified as a key renewal precinct, as shown in ***Figure 3.1***, and as a '*Transit Oriented Development Opportunity*' that can act as a catalyst for nearby development. The precinct is intended to support a mix of retail, office, community, residential and structured car parking uses, transitioning from large-format development and surface parking toward more integrated mixed-use development.

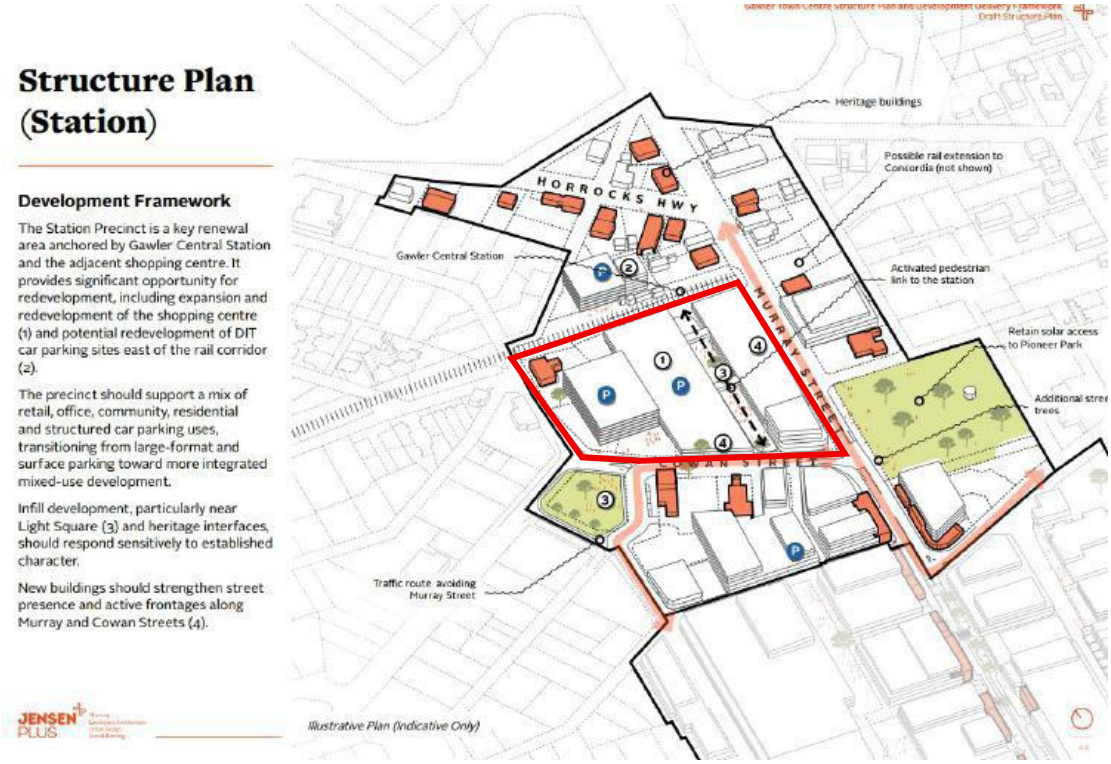


Figure 3-1 - Station Precinct Key Renewal Area (Source: Draft Gawler Town Centre Structure Plan)

Wakefield supports this approach and seeks the opportunity to work collaboratively with all levels of Government to deliver a project that would provide a high-quality public transport-oriented outcome for the Gawler region, attract investment, create employment opportunities and support a sustainable and resilient community in this important northern regional centre.

In addition, the analysis of the existing context and built form undertaken by Phillips Pilkington, dated May 2026, identifies that redevelopment of the Gawler Central Shopping Centre provides "*a major opportunity for a mixed-use development that can create a positive entrance experience to Gawler's historic Town Centre*". The analysis further identifies that the site offers significant redevelopment potential with minimal heritage impact, provided that an appropriate transition is achieved to adjoining lower-scale residential areas and the adjoining State Heritage Area.

The site is identified as an opportunity for an iconic gateway development incorporating a mix of land uses and increased building scale of up to five (5) storeys. Wakefield supports this strategic direction. However, it is considered important that sufficient flexibility be retained to consider additional building height and development intensity where this would facilitate a high-quality built form outcome, improve the feasibility and deliverability of a comprehensive mixed-use redevelopment, support the provision of improved public realm, amenity, structured car parking and pedestrian connections, and contribute to the broader economic development, housing and revitalisation objectives of the Structure Plan.

4. Planning & Design Code Recommendations

The following recommendations are directed to the future Planning and Design Code Amendment process and are intended to ensure that the strategic opportunity presented by the 'Gawler Central Shopping Centre' is translated into an appropriately flexible policy framework.

Wakefield supports the proposed scope of future Planning and Design Code Amendments identified in the Draft Structure Plan, including the proposed application of the 'Urban Activity Centre Zone', the creation of a new 'Gawler Town Centre Subzone' and the use of a supporting 'Concept Plan' to guide future built form, movement, interface and public realm outcomes.

This approach provides an appropriate planning framework to translate the Structure Plan vision into Code policy, while recognising that the detailed expression of the Subzone, Concept Plan and any associated technical and numerical variations will require further careful resolution through the Code Amendment process.

4.1. Proposed rezoning to 'Urban Activity Centre Zone'

Wakefield concurs with Council that the proposed change in zoning from the current 'Suburban Main Street Zone' to the 'Urban Activity Centre Zone' will provide a better alignment with the vision, flexibility of land uses and role of the Gawler Town Centre as a 'District Centre'. This change aligns with the zone hierarchy set out in the '*Guide to the Planning and Design Code, June 2022*', which identifies that the 'Urban Activity Centre Zone' is applied to large urban centres servicing a broad region that commonly incorporate public transport interchanges.

In particular, we note that the following key outcomes are sought for development in the 'Urban Activity Centre Zone':

- Supports a wider range of land uses to provide a comprehensive range of goods and services to the region (Zone PO 1.1), rather than to the local community and surrounding district (Suburban Main Street Zone PO 1.1), including car parking facilities, education facilities, emergency services facilities, hospitals, licensed premises and light industry uses, as identified in DPF 1.1 of the Urban Activity Centre Zone.
- Supports residential development at 'medium to high densities' (Zone PO 1.5) in locations where other relevant performance outcomes in the Code can be resolved. Based on the initial site analysis undertaken to date, the 'Gawler Central Shopping Centre' is of a size and dimension that can support additional development while addressing the key built-form and design parameters identified in the Draft Structure Plan.

4.2. Proposed 'Gawler Town Centre Subzone'

Wakefield agrees in principle with the proposed scope and content of the Subzone, subject to further resolution of the overall building height framework for the 'Gawler Central Shopping Centre' site. In particular, the Subzone should retain sufficient flexibility to allow the site's strategic role, consolidation, topography, multiple frontages and proximity to Gawler Central Railway Station to be fully considered through future development assessment.

4.2.1. Building height & built-form framework

Appendix 1 and ***2*** provides a review and analysis undertaken by 'Ekistics Planning and Design' and 'Bell Architecture' of the proposed building height against the built-form framework identified in the Draft Structure Plan, and the suitability of additional building height. This analysis indicates that the 'Gawler Central Shopping Centre' site is capable of accommodating built-form above five (5) storeys while continuing to achieve the proposed urban design outcomes of the Draft Structure Plan.

In particular, the site's large area, substantial depth, multiple street frontages, separation from adjoining properties by public roads, and topographical fall from south to north provide significant flexibility in managing height, setbacks, visual bulk, solar access and interface outcomes. The site's natural level change also provides opportunities to efficiently integrate undercroft or partially concealed parking within any future redevelopment, enhancing project feasibility while reducing the extent and visual impact of at-grade parking and supporting a high-quality built form and public realm outcome.

This preliminary analysis indicates that a maximum building height in the order of eight (8) building levels (and potentially higher) can comfortably satisfy the relevant built-form parameters, including protection of heritage and character, reinforcement of the street wall, appropriate upper-level setbacks, maintenance of streetscape ratios, solar access to key streets and public open spaces, and sensitive management of residential and heritage interfaces.

On this basis, Wakefield recommends that the future Subzone and Concept Plan should enable additional height where a future development can demonstrate that it achieves the relevant built-form parameters, manages interfaces appropriately and supports the intended mixed-use, transit-oriented role of the precinct.

4.2.2. Concept Plan

The Draft Structure Plan includes a Concept Plan to guide the spatial and urban design characteristics of future development, including maximum building heights, interface types, solar access and key view corridors. An extract of the Concept Plan as it is proposed to apply to the 'Gawler Central Shopping Centre' is included in ***Figure 4.1.*** Wakefield supports the use of a 'Concept Plan', provided it remains outcome-focussed and sufficiently flexible to guide future development without unnecessarily prescribing built-form, circulation, staging or redevelopment options for the 'Gawler Central Shopping Centre' site.

We provide specific feedback on elements of the Concept Plan below:

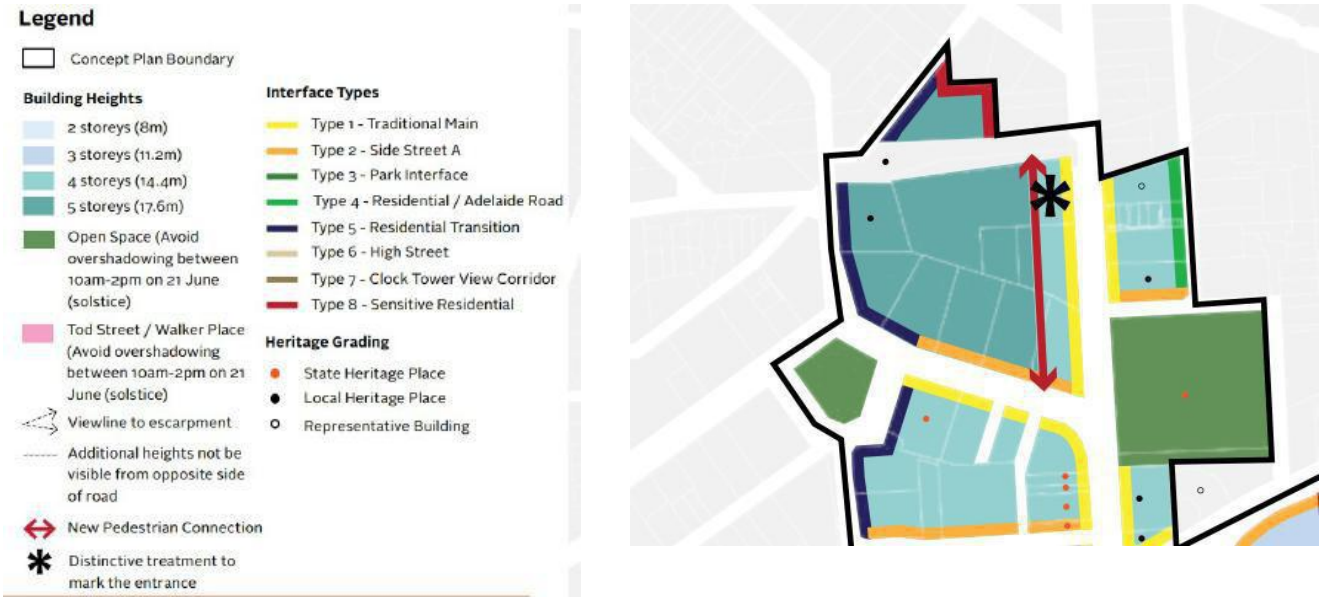


Figure 4-1 - Extract of Proposed Concept Plan (Source: Draft Gawler Town Centre Structure Plan, p91)

Building height

As outlined above, Wakefield recommends that the 'Concept Plan' retain flexibility to accommodate additional building height on the 'Gawler Central Shopping Centre' site where a future development can demonstrate that it satisfies the built-form parameters identified in the Draft Structure Plan. This position is supported by the review and analysis in ***Appendix 1***, which indicates that additional height can be considered in a manner that responds appropriately to heritage, streetscape, solar access, interface and topographical considerations, while supporting the delivery of a high-quality mixed-use and transit-oriented redevelopment outcome.

Measurement of building height

The Draft Concept Plan identifies building heights of up to 17.6 metres for five (5) storey buildings. To provide a reasonable allowance for suitable floor-to-floor ceiling heights as well as associated servicing and structural requirements for mixed-use, multi-level buildings, Wakefield recommends that this be increased to a minimum of 19 metres for five (5) storey buildings, and similarly for any additional building levels that may be the final outcome of the Structure Plan.

Sunlight into Light Square and Pioneer Park

The proposal to avoid any overshadowing to Light Square and Pioneer Park between 10am-2pm is more restrictive than the current controls in the Code for low-scale residential development. Wakefield recommend Council consider adopting a consistent policy approach to existing Code Policies. Notwithstanding, Wakefield's own analysis identifies that additional building levels can be developed on the Gawler Central Shopping Centre site without casting any greater loss of sunlight at the winter solstice than the proposed Concept Plan and built-form framework (with the appropriate siting and setback of additional building levels).

New Pedestrian Connection

The Concept Plan identifies a '*New Pedestrian Connection*' through the Gawler Central Shopping Centre. The indicative alignment passes directly through the existing shopping centre complex. Wakefield understands from discussions with Council staff that the intent of this notation is to signal a desire to improve pedestrian connections between the railway station and the broader Town Centre, rather than to prescribe a specific future alignment through the site.

Wakefield supports the intent of improving pedestrian permeability through the precinct and acknowledges that the landholding presents an opportunity to support improved pedestrian connectivity, in addition to the existing surrounding public streets. However, the identification of a specific 'pedestrian route' through the site where that location has not been fully tested through detailed site planning, design, staging and redevelopment feasibility works, could unnecessarily constrain future redevelopment opportunities. Wakefield therefore requests that the location and expression shown on a 'Concept Plan' is expressed as an indicative, outcome-based connection rather than a prescribed alignment, so that is supports and does not restrict future site redevelopment opportunities.

Distinctive Treatment to mark the entrance

Wakefield understands from discussions with Council staff that the '*Distinctive treatment to mark the entrance*' identified in the 'Concept Plan' is intended to refer to a street entry treatment within Murray Street, rather than an entry feature located on the 'Gawler Central Shopping Centre site'. On this basis and subject to the necessary refinements to the Concept Plan to clarify this intention, Wakefield supports the inclusion of this treatment as a useful measure to reinforce the identification of the Town Centre, and understands that similar treatments may also be identified at other key entry points.

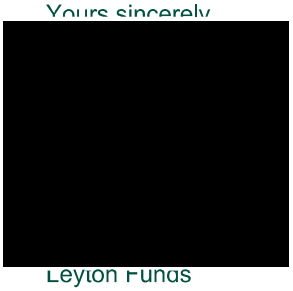
5. Summary

The redevelopment of the 'Gawler Central Shopping Centre' represents a significant opportunity to deliver a more integrated and contextually responsive outcome than the existing large-format retail and at-grade car parking arrangement. A future mixed-use redevelopment could strengthen the northern end of Murray Street, improve pedestrian connections to Gawler Central Station and Pioneer Park, create a stronger street edge to Cowan Street and King Street, and support greater activity beyond traditional retail trading hours.

Wakefield supports the overall vision and intent of the Draft Structure Plan and welcomes the opportunity to work with Council through the future Code Amendment process. In particular, Wakefield seeks further engagement on the proposed Concept Plan, built-form parameters, pedestrian connections, development intensity and policy settings so that the strategic redevelopment potential of the Gawler Central Shopping Centre is fully recognised and appropriately enabled, including through a flexible approach to building height where additional height can be demonstrated to satisfy the relevant built-form, interface, public realm, housing and economic development outcomes.

Please do not hesitate to contact the undersigned at [redacted] if you would like to discuss this submission or require any further information.

Yours sincerely



Leyton Funds

APPENDIX 1

Analysis of Built-Form Parameters

APPENDIX 2

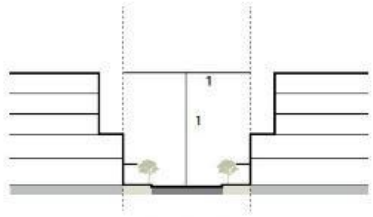
Preliminary Site Built-Form Modelling (Bell Architecture)

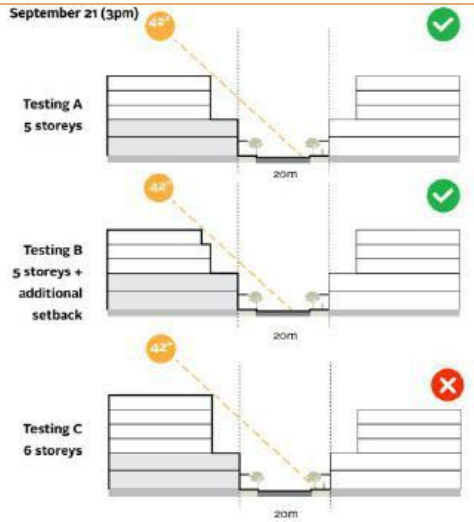
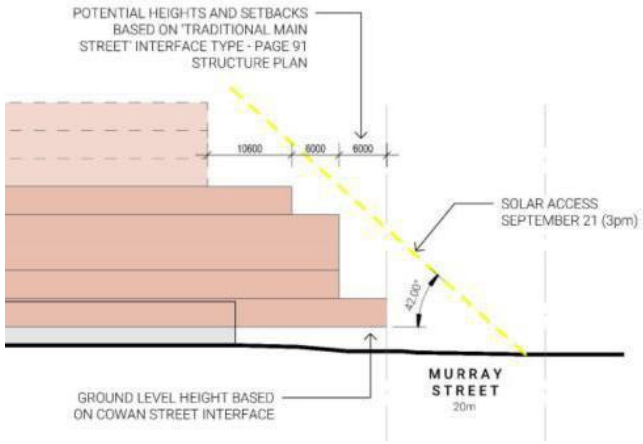
Appendix 1 – Review against Built-Form Parameters in Draft Structure Plan

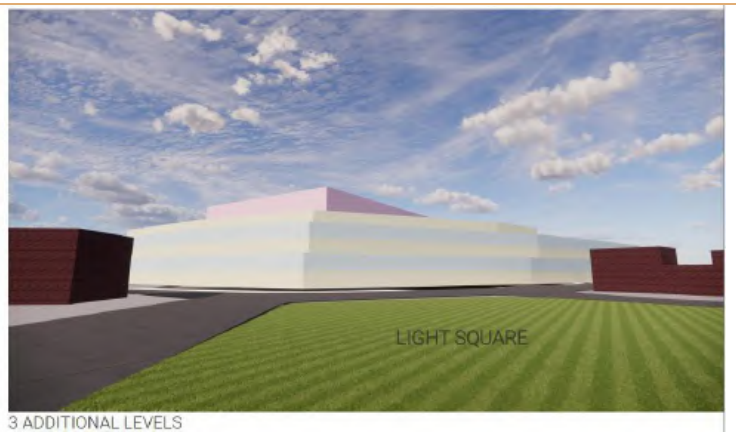
Section 2.9 – Built Form Framework of the Draft Structure Plan identifies 10 design parameters that have been used to assess and review the Recommended Built Form Framework.

The table below provides an analysis of the each of the Design Parameters for the Gawler Central Shopping Centre site, with a focus on the potential and suitability for buildings above 5 building levels to continue to satisfy the relevant Design Parameter.

Built-Form Parameters	Explanation of Design Parameters – as per the Investigations informing the Draft Structure Plan.	Analysis of the Gawler Central Shopping Centre Site
Heritage + Character	The Draft Structure Plan seeks to protect and enhance Gawler's heritage and character by reinforcing the Murray Street streetwall, setting back taller elements, managing height transitions to sensitive heritage areas, retaining the legibility of historic residences and front gardens, and protecting important views such as those to the Gawler East Escarpment.	• The site includes an existing Local Heritage Place at 5 King Street occupying a small area located in the north-western corner of the site, or 25m of an 85m overall site frontage to King Street. Existing Code provisions (Local Heritage Place Overlay, Heritage Adjacency Overlay) apply to ensure suitable relationship is achieved with new development. • The site is separated from the Church Hill State Heritage Area by Cowan Street, and new development could occur within the 'building envelope' identified in the Draft Structure Plan. Existing Code provisions (Heritage Adjacency Overlay) would apply to new development proposals. • The site is not located in an area of the Gawler Main Street where the protection of important views of the Gawler East Escarpment have been identified in the Draft Concept Plan.
Streetwall	The Draft Structure Plan seeks to maintain a consistent human-scale street edge that responds to Gawler's heritage fabric, generally through a 2 storey streetwall across the centre, with a 3 storey streetwall recommended along Apex Park to provide a stronger and well-proportioned built edge to the open space.	• The proposed street wall heights are supported. Any buildings above 2 building levels are able to be stepped back from the site frontage due to the large allotment depth, as illustrated in Appendix 2

Streetscape Ratio	The Draft Structure Plan seeks to balance building height with street width to create comfortable, pedestrian-scaled public spaces, applying a general 1:1 streetscape ratio along Murray Street (as per image below) and a more enclosed ratio on narrower side streets to support density, passive surveillance and pedestrian amenity while retaining sky views.  Murray Street (20m)	• The dimensions of the site enable the proposed streetscape ratio's to be achieved. Any building elements above 5 storeys could be setback further from street boundaries to maintain the desired balance between street enclosure, passive surveillance and sky views. • The sections and building envelope images in Appendix 2 demonstrate that the site size and dimensions present opportunities for a 'developable' building enveloped above five (5) building levels.
Solar Access to Murray Street	The Draft Structure Plan seeks to maintain appropriate sunlight to Murray Street footpaths, recognising their importance to comfort and activity, with testing indicating that a 5 storey outcome can maintain reasonable solar access while a 6 storey outcome is likely to unacceptably reduce sunlight at key times, as per the diagrams below.	• As a large and amalgamated site with a depth of over 100m from Murray Street, a building of greater than 5 storeys in building height with a further setback above 5 storeys and maintain solar access to the footpaths on the opposite side of Murray Street, as illustrated below in Section C in Appendix 2.

			
Visual Bulk	The Draft Structure Plan seeks to minimise the visual bulk of taller development so that new buildings do not overwhelm the historic streetscape, key view corridors or valued low-rise streetwall character, with upper-level setbacks used to balance development capacity with visual relief.	• The large site creates opportunity for buildings above the proposed 5 storey height building to avoid the excessive enclosure leading to a change of street character. As illustrated below, additional building levels above 5 storeys can be located on the site away from street frontages and not interfere with view corridors as illustrated below (and in Appendix 2). • Resolution of any aspects of detail could addressed, if required, in the preparation of policy in the proposed Gawler Town Centre Subzone and Concept Plan as part of a future Code Amendment process.	



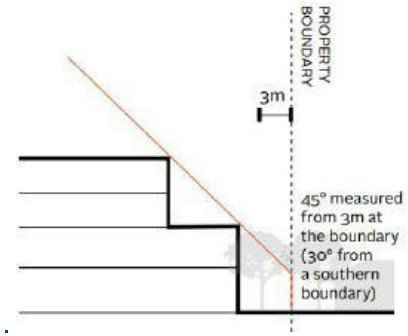
View from Light Square towards the site with 3 additional building levels

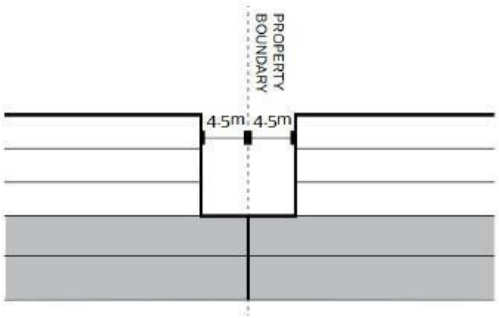


View from Murray Street looking north towards the site with 3 additional building levels.

Relationship between streetwall and upper levels	The Draft Structure Plan seeks to ensure that heritage and main street streetwalls remain visually dominant, with upper levels set back behind the street edge to preserve façade prominence, maintain the rhythm	• The subject site is not in a section of the Gawler Town Centre where a low scale historic streetscape character exists. As commented above, as a large and amalgamated site, there is a flexibility in how future buildings across the site are

	and scale of the streetscape, and clearly distinguish taller contemporary development from the lower streetwall.	sited and arranged to achieve a suitable streetscape relationship, including the setting back of upper levels from the public streets so that new buildings fit with the desired streetscape character.
Solar access to Open Space	The Draft Structure Plan seeks to protect solar access to key public open spaces between 10am and 2pm on 21 June, including Light Square, Pioneer Park, Goose Island, Apex Park, Fifth Street Reserve, Tod Street, Walker Place and future open spaces, so that these areas remain comfortable, usable and attractive year-round.	• As illustrated in Appendix 2, additional building height could be achieved on this site without casting additional shadow to Light Square or Pioneer Park. • The inclusion of a design requirement to achieve this outcome in a future Concept Plan is supported.
Transition and Skyline	The Draft Structure Plan seeks to manage transitions in building height and skyline form so that development steps down toward heritage, residential and other sensitive interfaces, while protecting landmark views, townscape character and the broader legibility of Gawler's historic setting.	• The large and amalgamated site provides opportunity to ensure the buildings are positioned to avoid visually dominating the skyline. • We note that the Draft Subzone policies and Concept Plan do not identify any important view lines across the subject land. Existing Code policies would already apply where related to the setting of a heritage place.
Residential Interface	The Draft Structure Plan seeks to manage residential interfaces by requiring building scale, setbacks, landscaping and separation to respond sensitively to nearby dwellings, maintaining reasonable amenity in terms of privacy, outlook, daylight, solar access and perceived scale	• The site is separated from any adjoining properties by public streets and is generally surrounded by commercial uses, such that there are limited interfaces with low-density residential properties.



Building Separation	The Draft Structure Plan seeks to establish appropriate side and rear setbacks, as well as separation between buildings within larger sites, to maintain outlook, daylight and solar access, provide clear views to the sky, and ensure future development opportunities on adjoining land are not unreasonably constrained. 	• The site is separated from adjacent land by public streets, such that any requirements for building separation would be unlikely to apply.

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GAWLER TOWN CENTRE

STRUCTURE PLAN RESPONSE

16 JULY 2026

Proposed Gawler Town Centre Sub-Zone







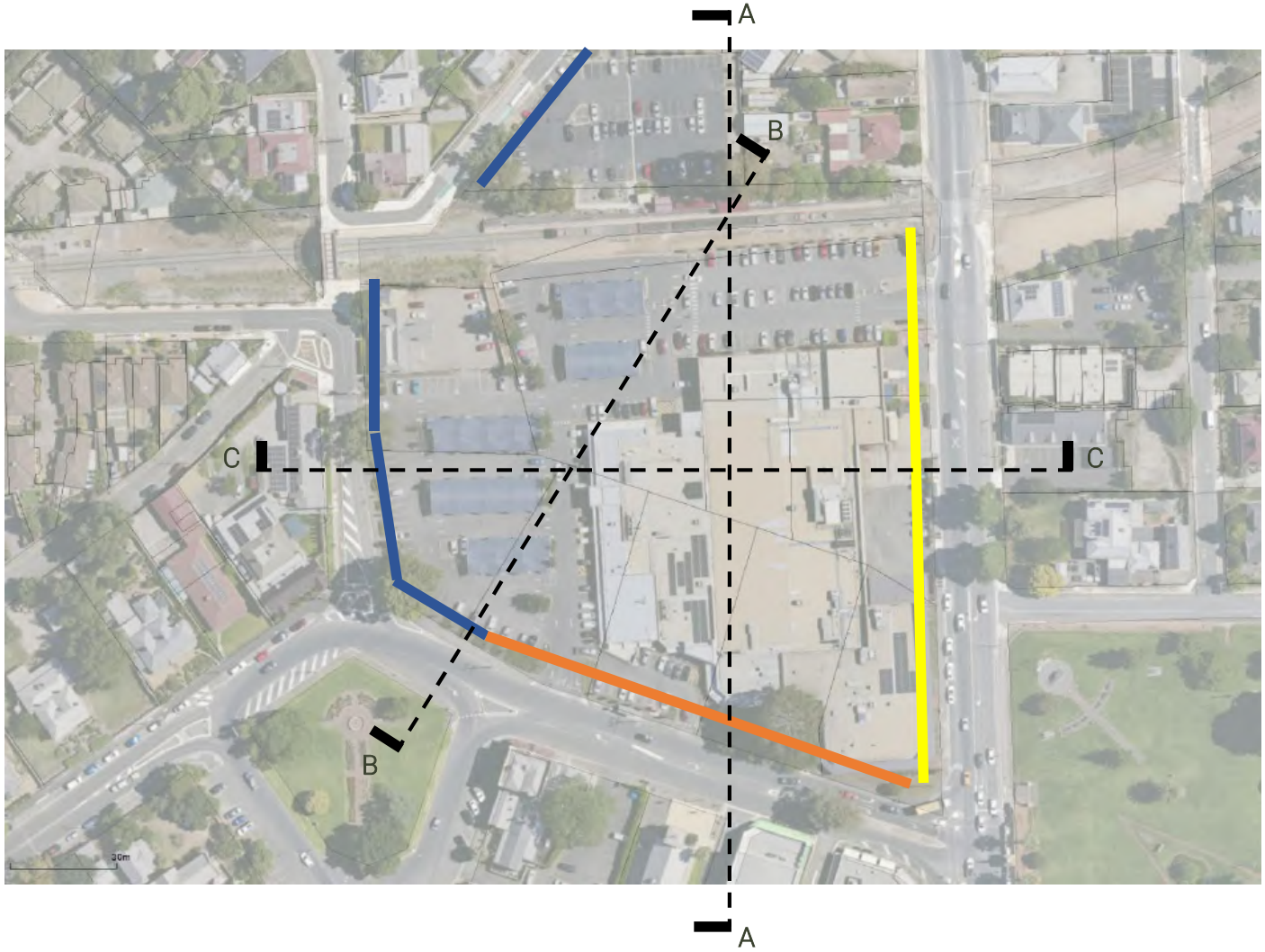
Interface Types

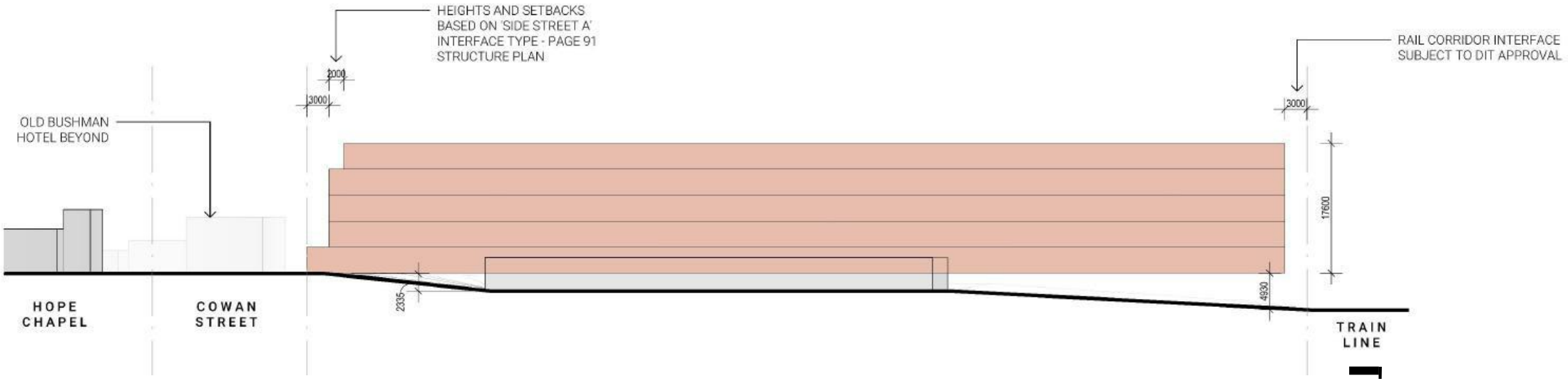
- Type 1 - Traditional Main
- Type 2 - Side Street A
- Type 3 - Park Interface
- Type 4 - Residential / Adelaide Road
- Type 5 - Residential Transition
- Type 6 - High Street
- Type 7 - Clock Tower View Corridor
- Type 8 - Sensitive Residential



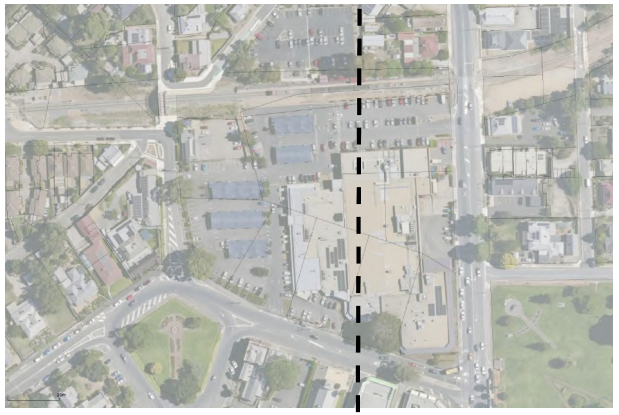
Building Heights

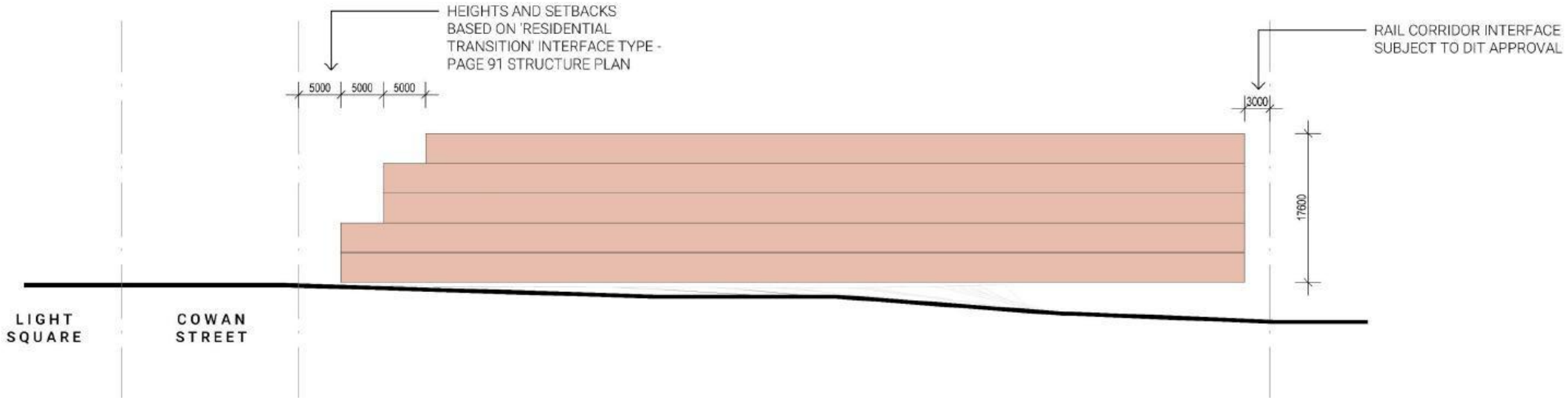
- 2 storeys (8m)
- 3 storeys (11.2m)
- 4 storeys (14.4m)
- 5 storeys (17.6m)


A
B
C
C
B
A

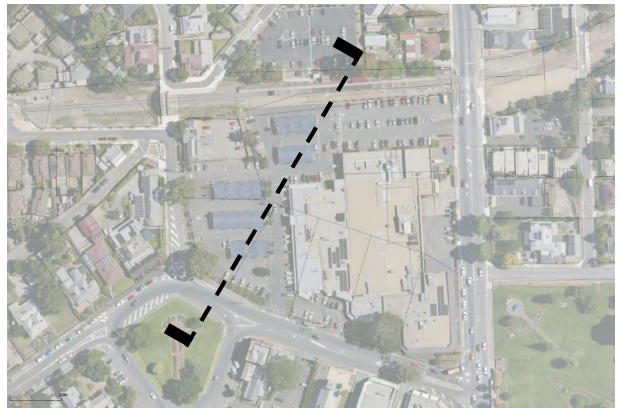

HEIGHTS AND SETBACKS
BASED ON 'SIDE STREET A'
INTERFACE TYPE - PAGE 91
STRUCTURE PLAN
RAIL CORRIDOR INTERFACE
SUBJECT TO DIT APPROVAL
OLD BUSHMAN
HOTEL BEYOND
2000
3000
3000
17600
2335
4930
HOPE
CHAPEL
COWAN
STREET
TRAIN
LINE

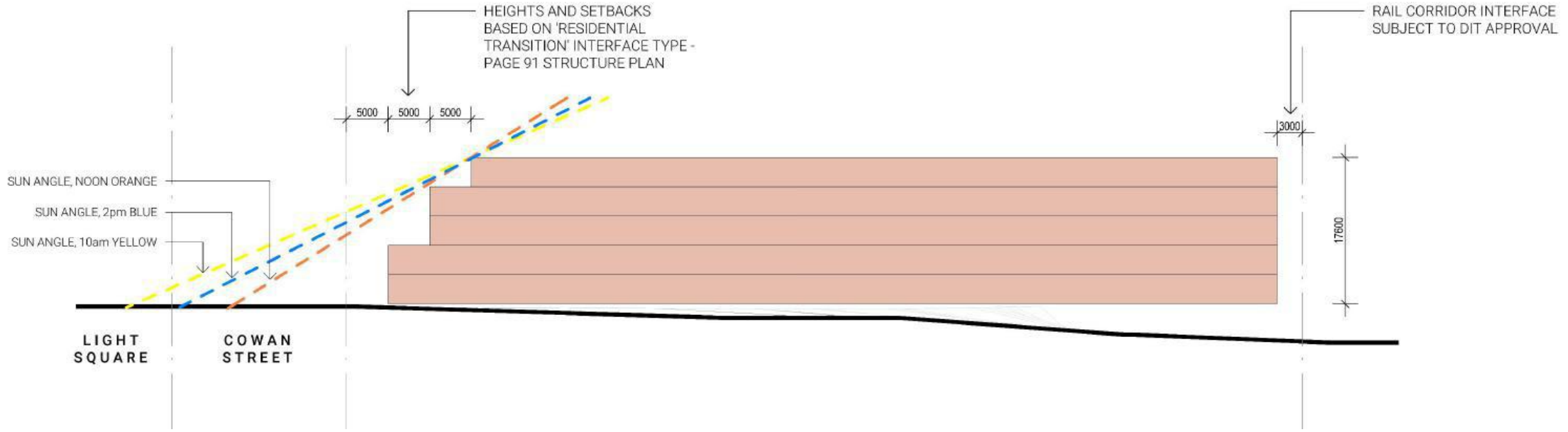
SECTION A



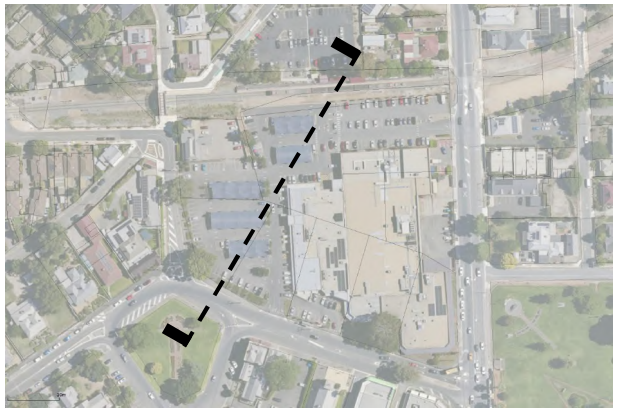

HEIGHTS AND SETBACKS
BASED ON 'RESIDENTIAL
TRANSITION' INTERFACE TYPE -
PAGE 91 STRUCTURE PLAN
5000
5000
5000
RAIL CORRIDOR INTERFACE
SUBJECT TO DIT APPROVAL
3000
17600
LIGHT
SQUARE
COWAN
STREET

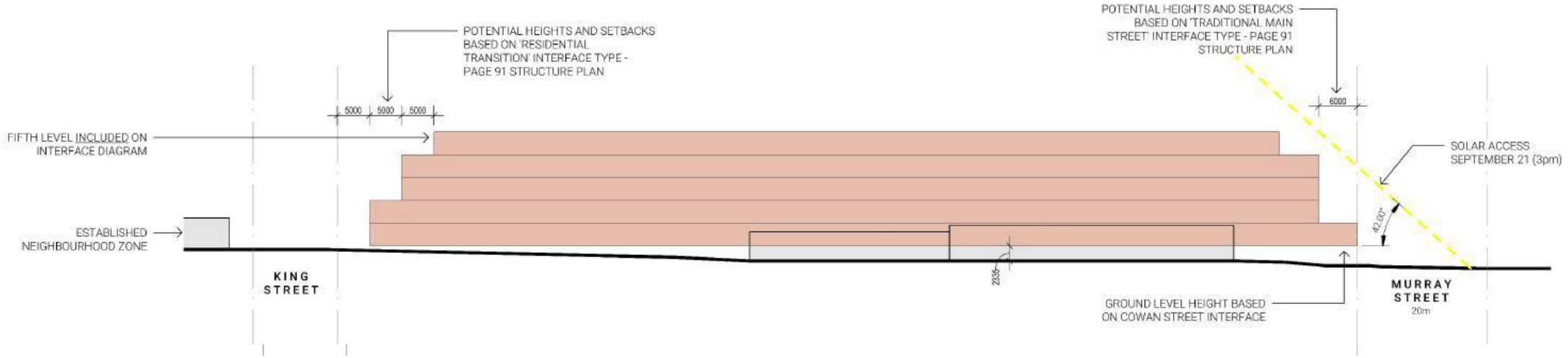
SECTION B



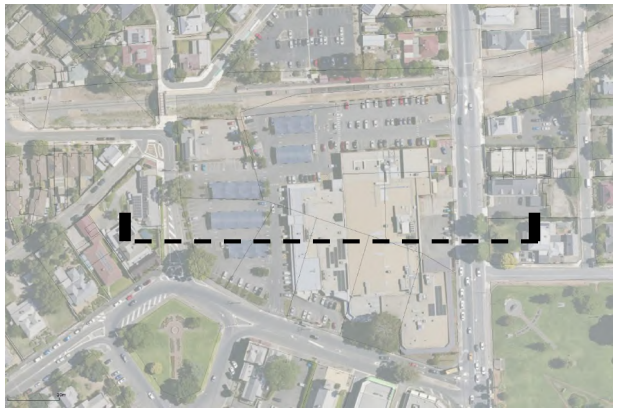


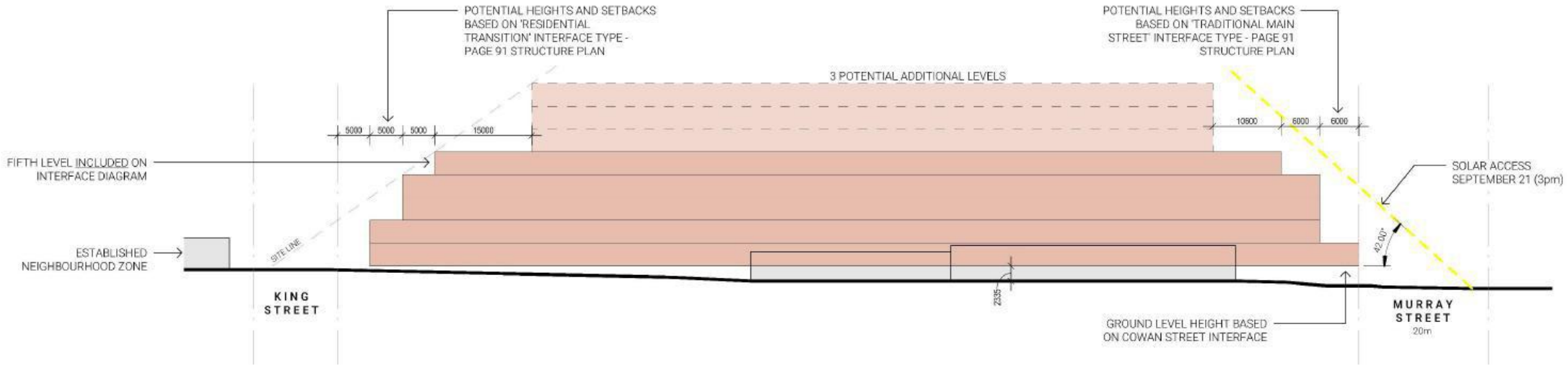
SECTION B –WITH SOLAR ACCESS



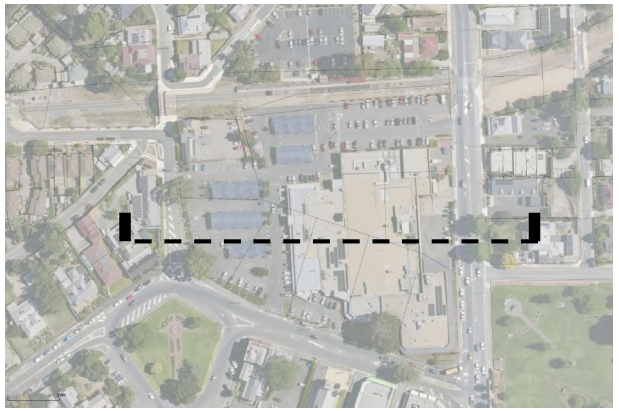

POTENTIAL HEIGHTS AND SETBACKS BASED ON 'RESIDENTIAL TRANSITION' INTERFACE TYPE - PAGE 91 STRUCTURE PLAN
5000
5000
5000
FIFTH LEVEL INCLUDED ON INTERFACE DIAGRAM
ESTABLISHED NEIGHBOURHOOD ZONE
KING STREET
2335
POTENTIAL HEIGHTS AND SETBACKS BASED ON 'TRADITIONAL MAIN STREET' INTERFACE TYPE - PAGE 91 STRUCTURE PLAN
6000
SOLAR ACCESS SEPTEMBER 21 (3pm)
42.00°
GROUND LEVEL HEIGHT BASED ON COWAN STREET INTERFACE
MURRAY STREET
20m

SECTION C





SECTION C – ADDITIONAL 3 LEVELS



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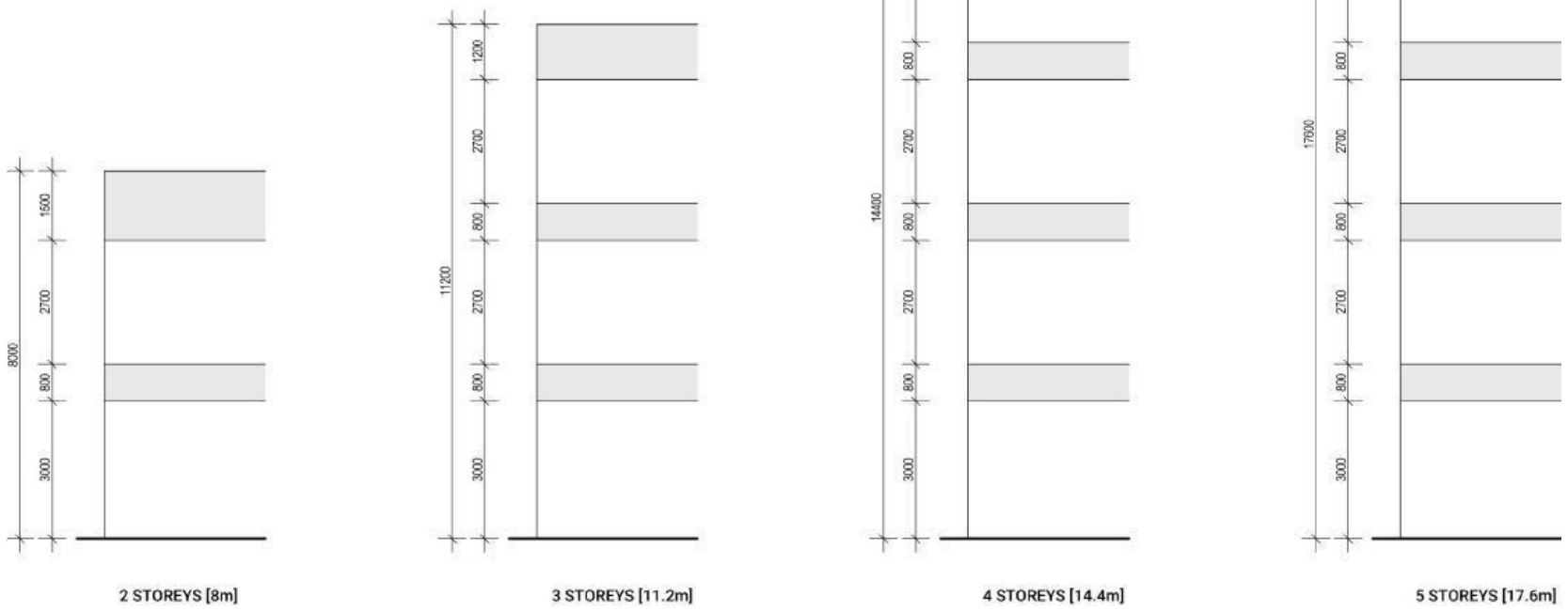
FLOOR LEVELS

SUGGEST ADDITIONAL HEIGHT ALLOWANCE IS MADE TO ALLOW FOR HIGHER CEILING AT GROUND FLOOR LEVEL, AND REASONABLE ALLOWANCE FOR ROOF STRUCTURE.

SUGGEST 15.5m FOR 4 STOREYS AND 19m FOR 5 STOREYS

Building Heights

- 2 storeys (8m)
- 3 storeys (11.2m)
- 4 storeys (14.4m)
- 5 storeys (17.6m)



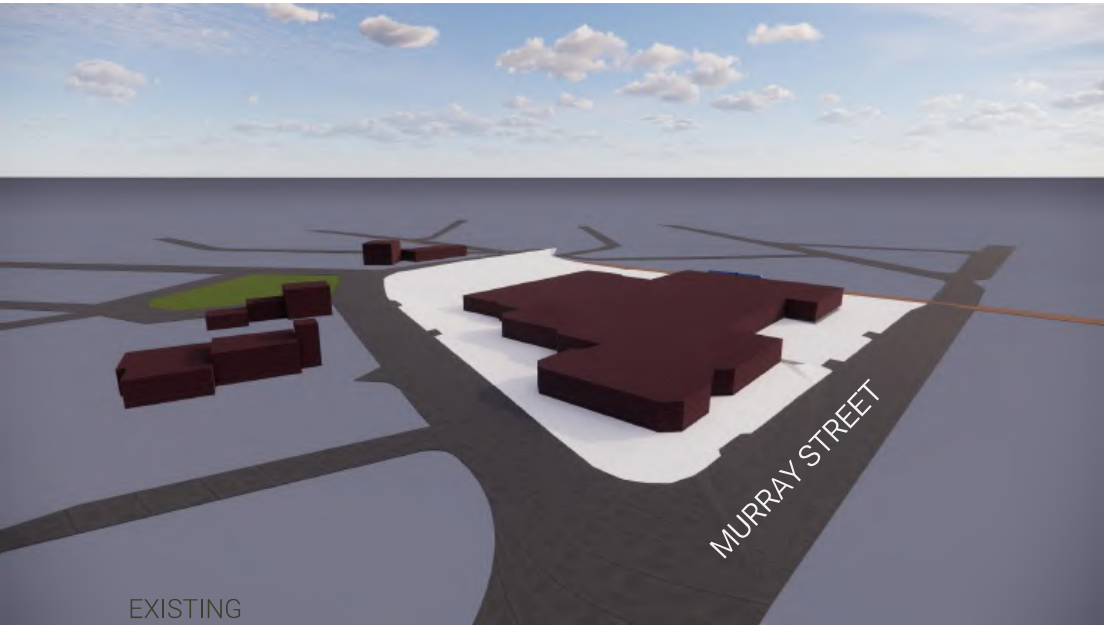
2 STOREYS [8m]

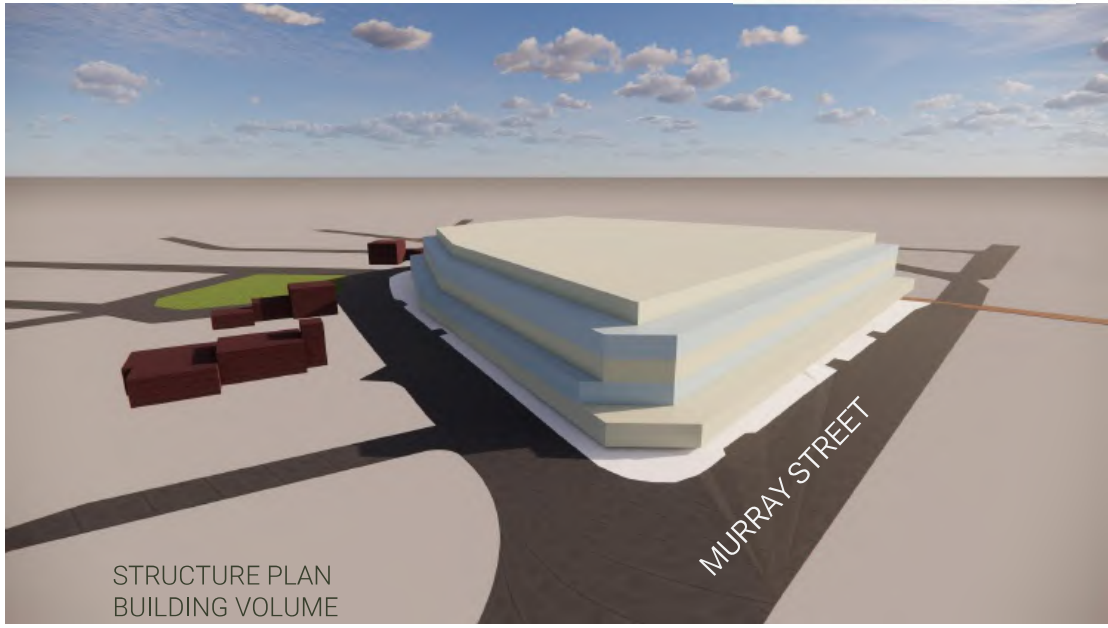
3 STOREYS [11.2m]

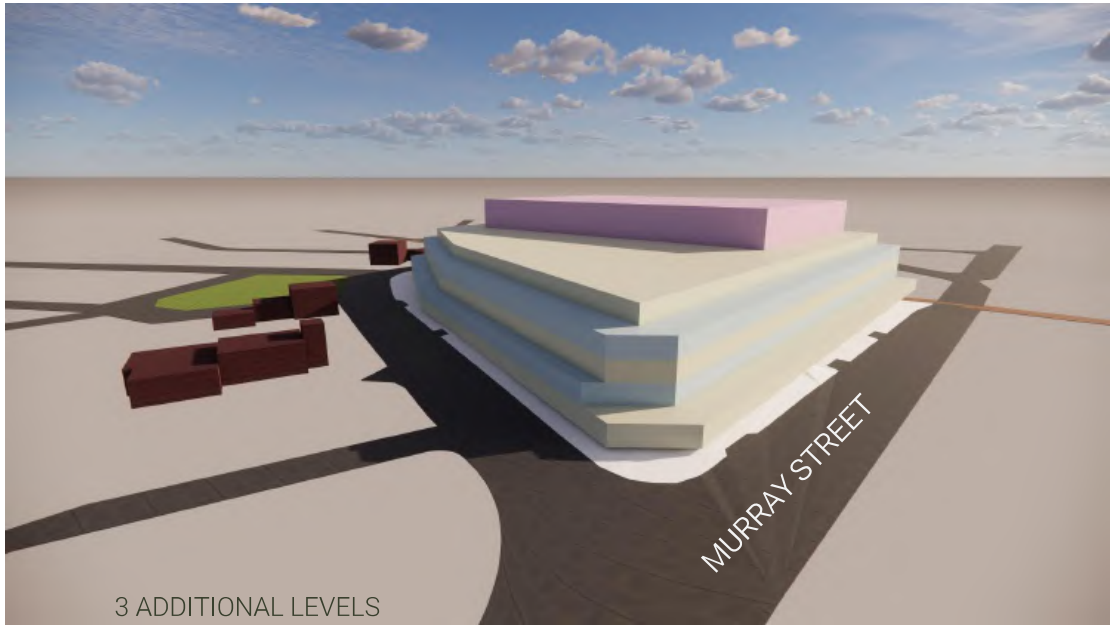
4 STOREYS [14.4m]

5 STOREYS [17.6m]

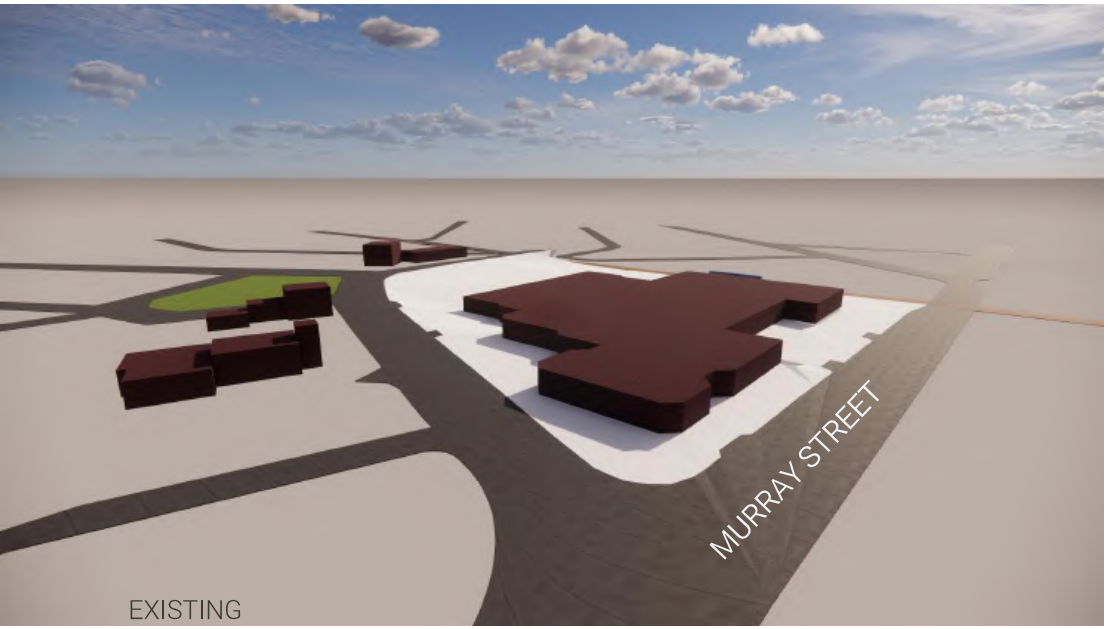
MURRAY STREET
21 June 10am

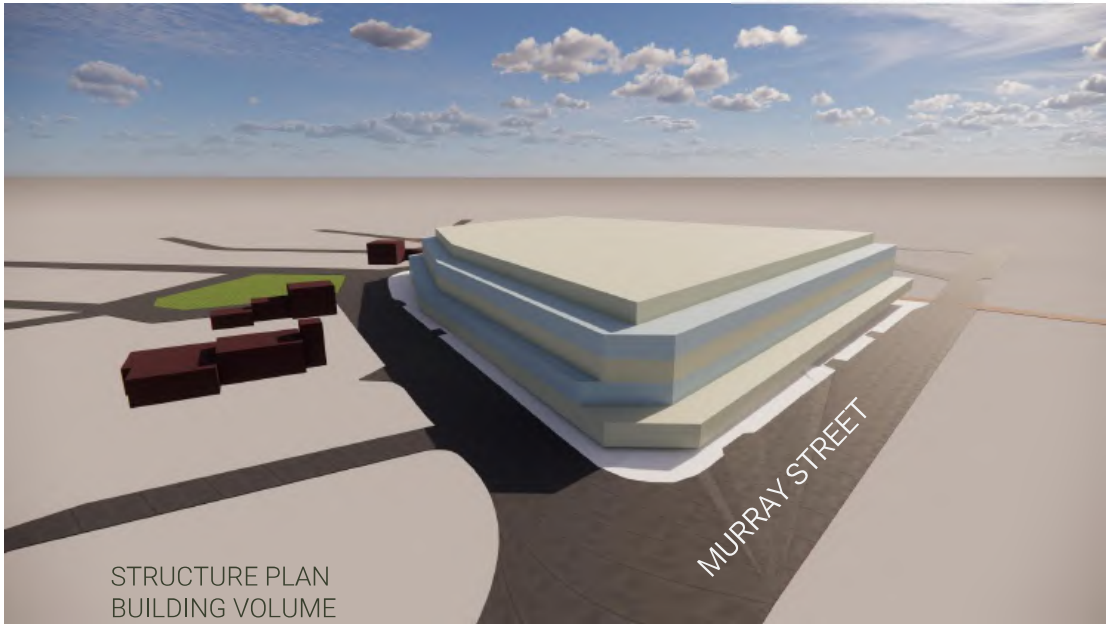


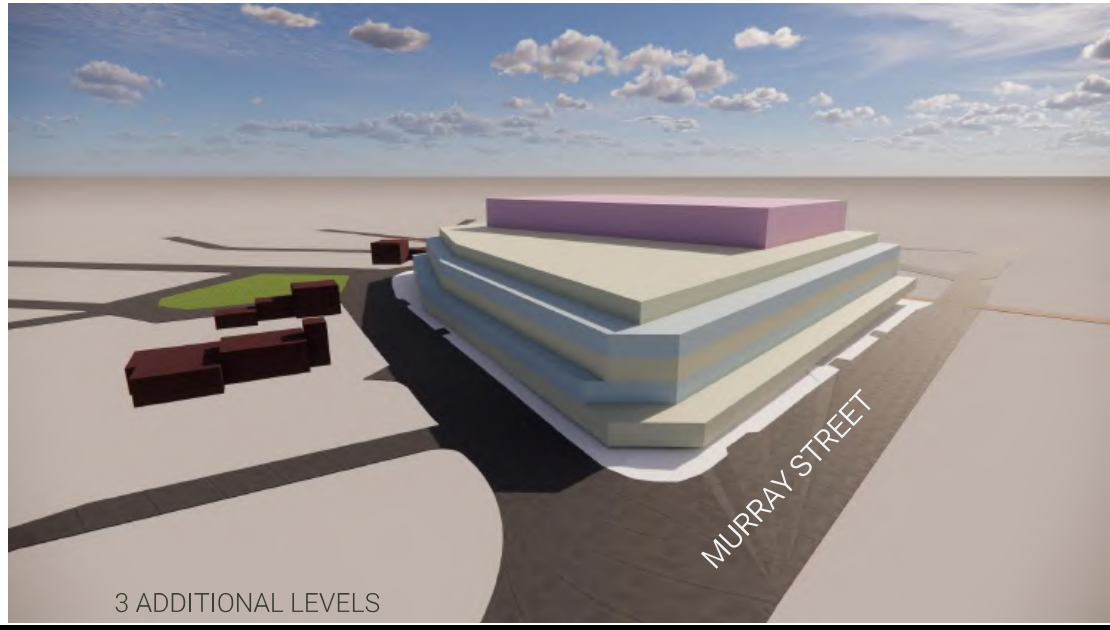




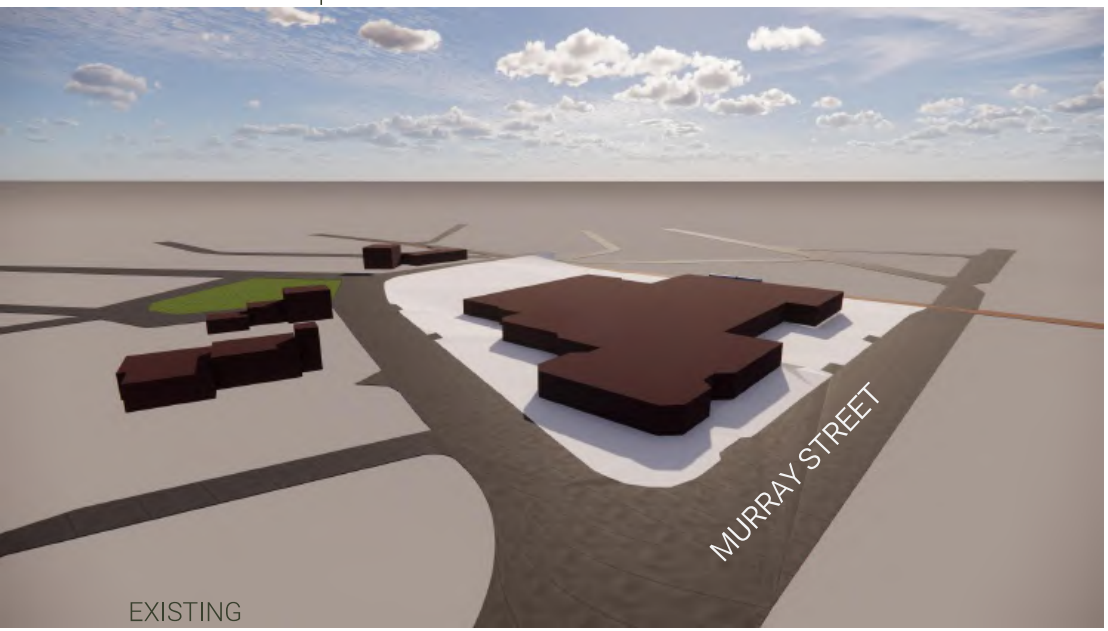
MURRAY STREET
21 June Noon

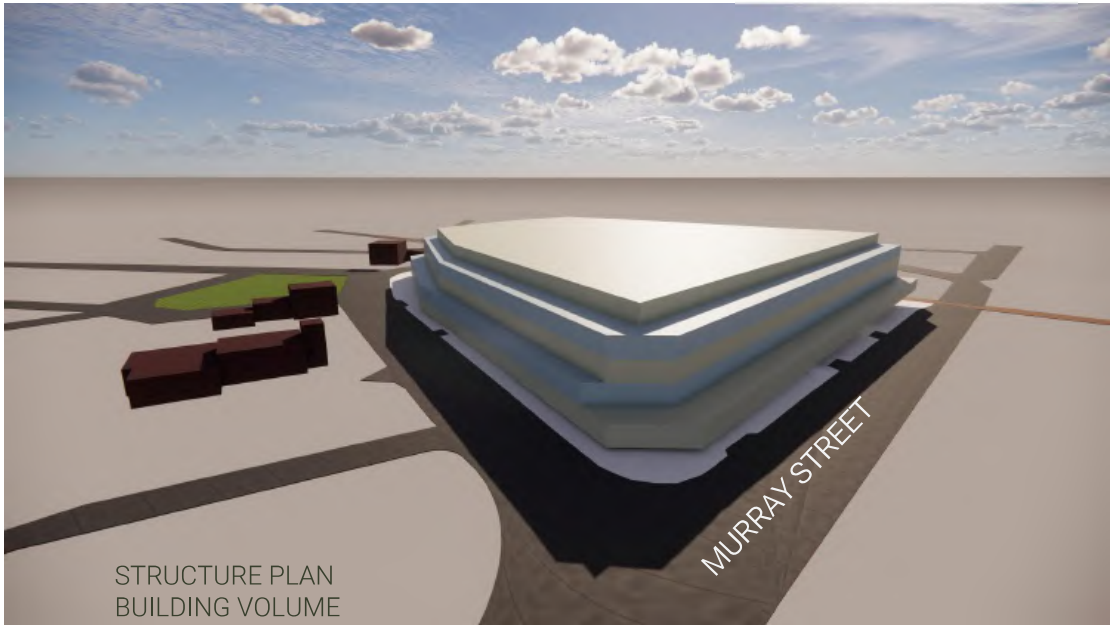


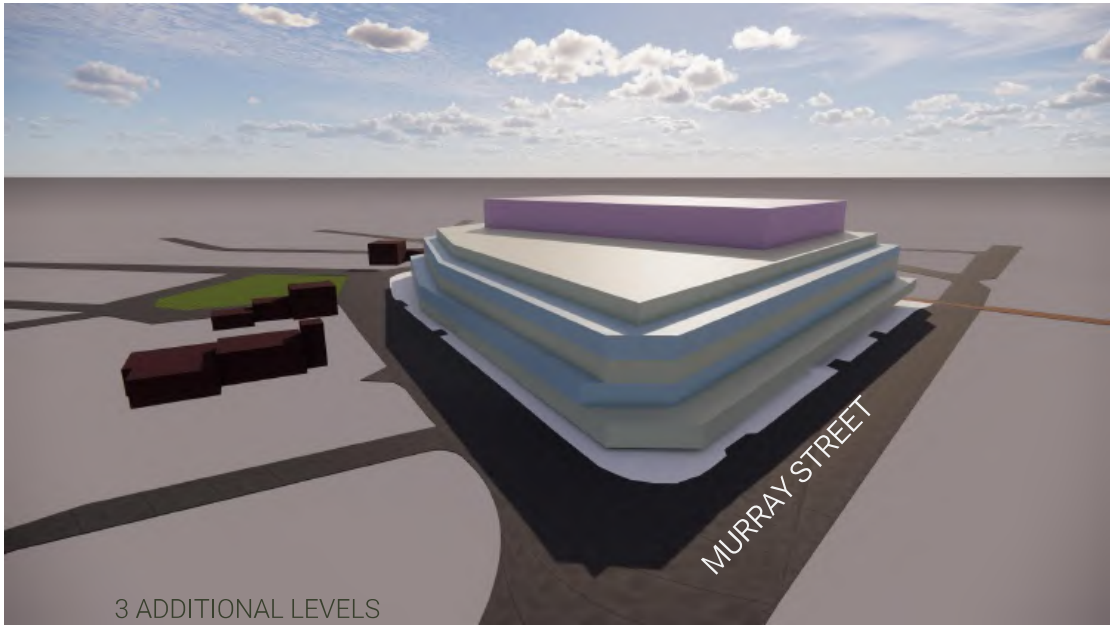




LEYTON FUNDS



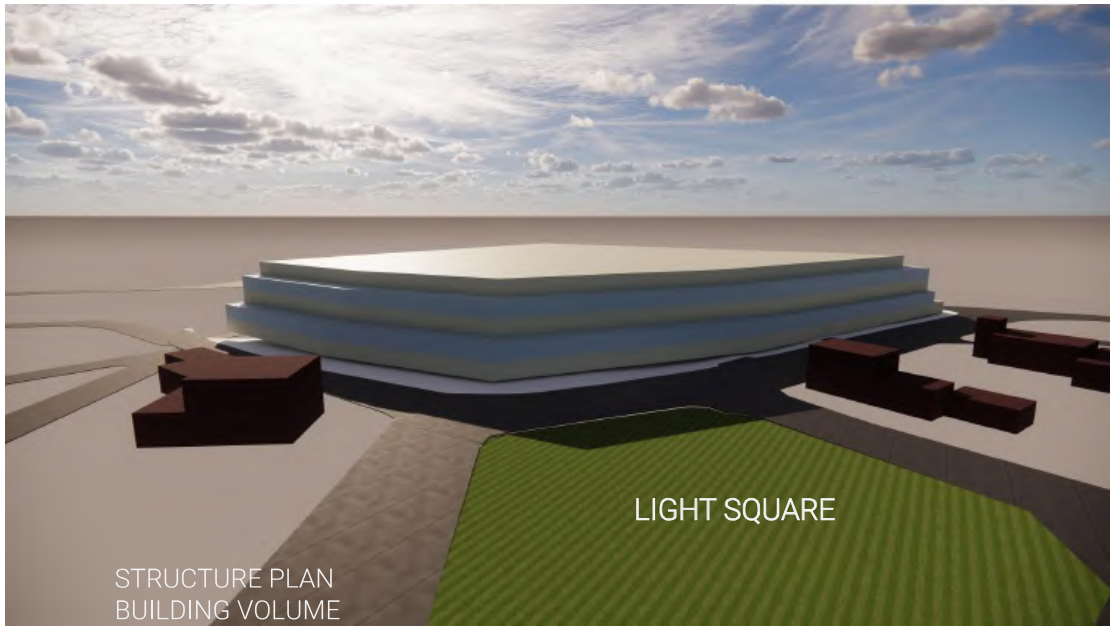


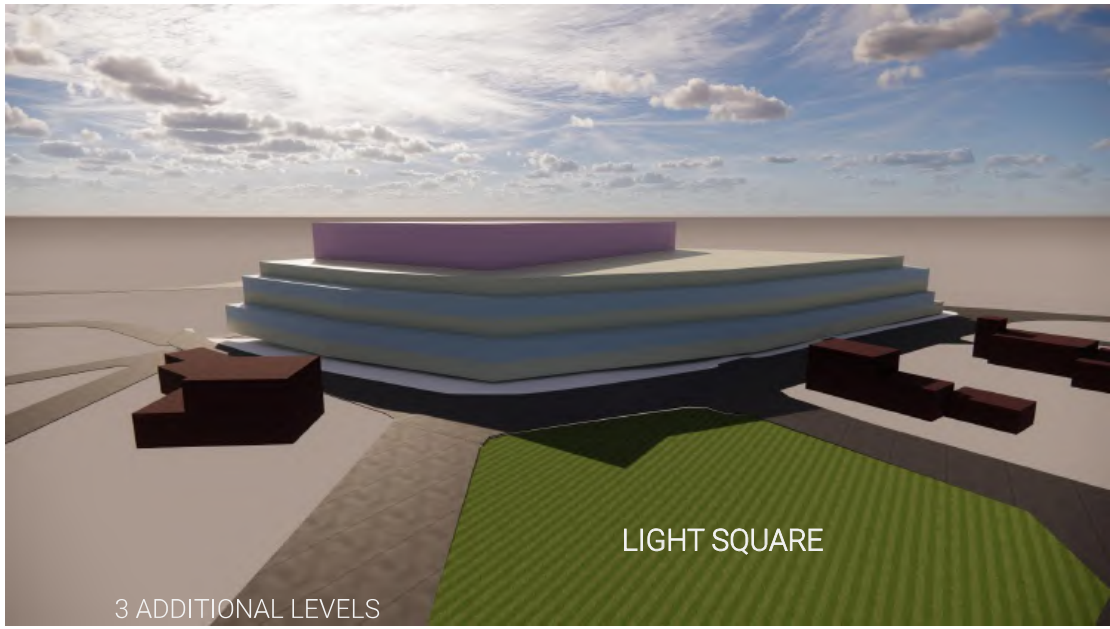


LIGHT SQUARE
21 June 10am

LEYTON FUNDS



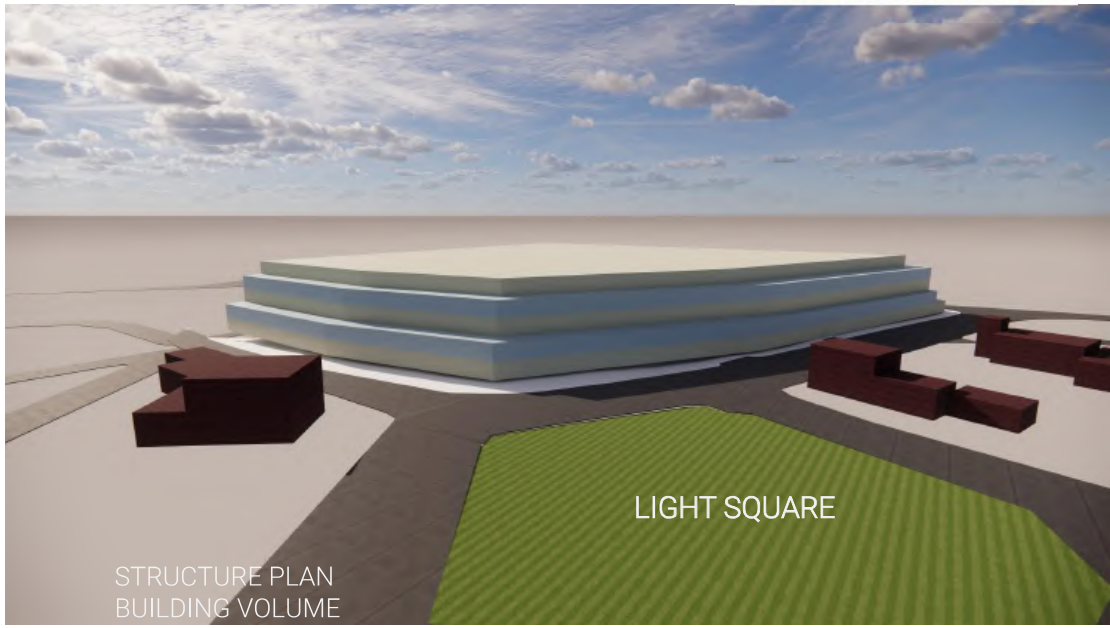


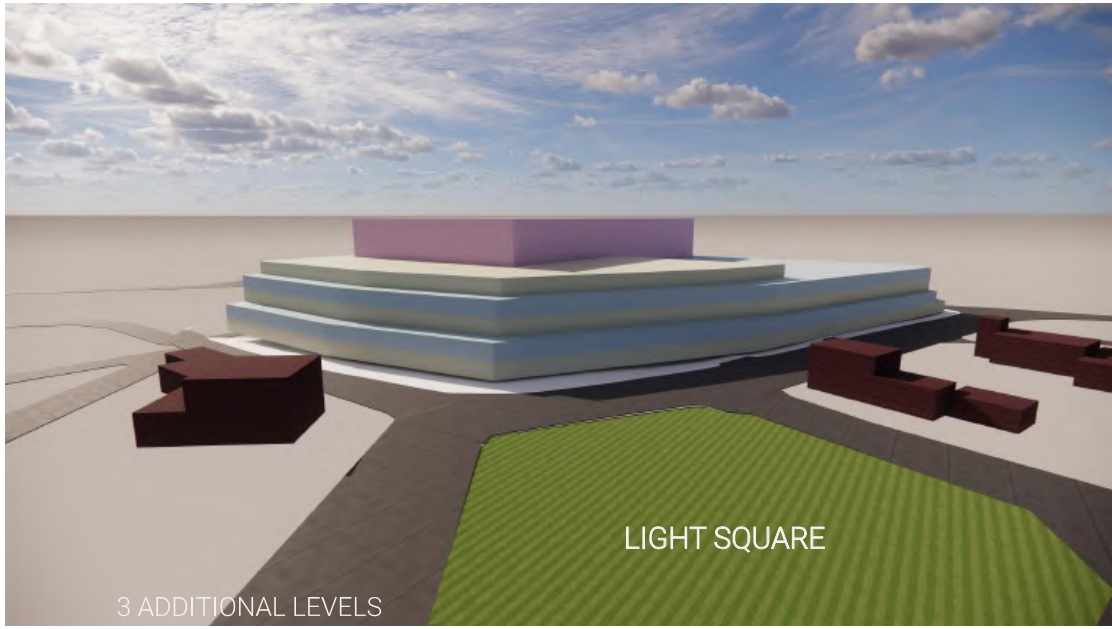


LIGHT SQUARE
21 June Noon

LEYTON FUNDS





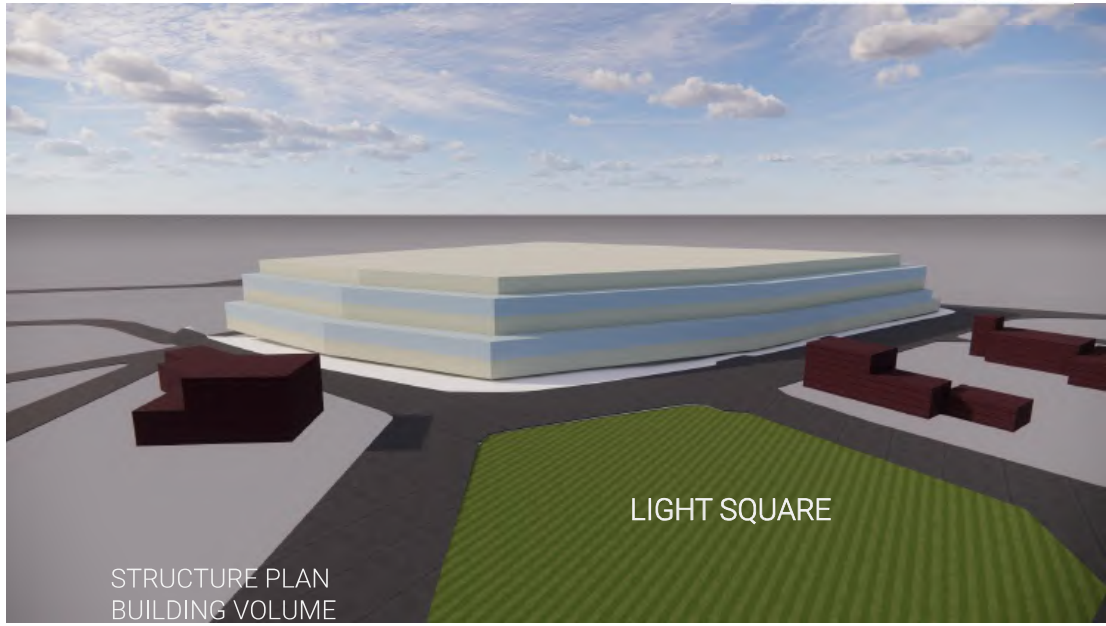


LIGHT SQUARE
21 June 2pm

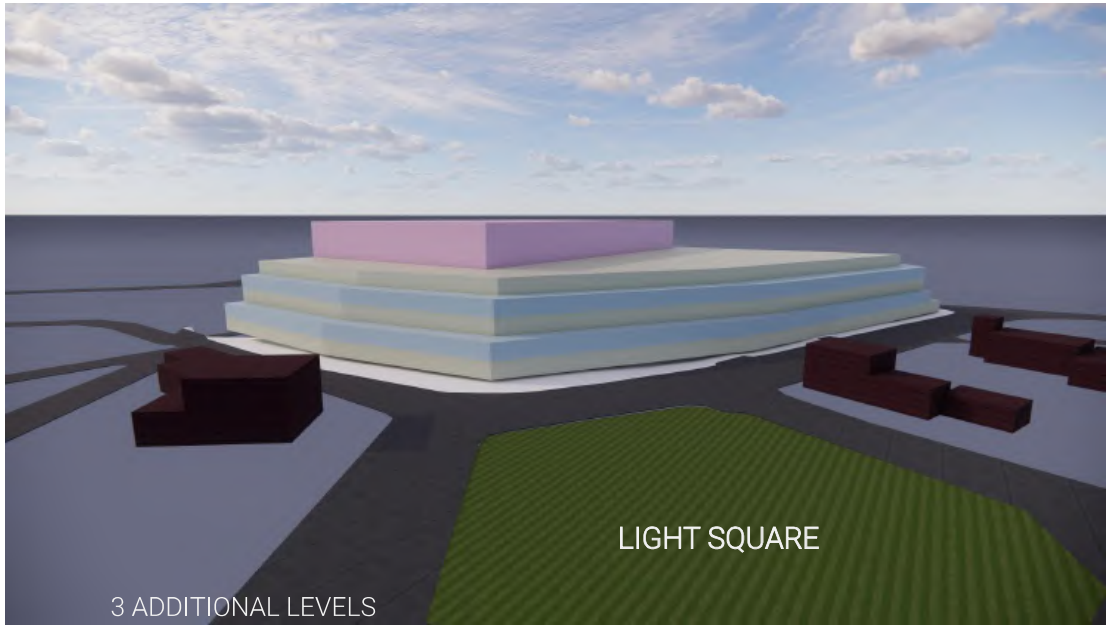
LEYTON FUNDS



EXISTING



STRUCTURE PLAN
BUILDING VOLUME



3 ADDITIONAL LEVELS

LEYTON FUNDS

MURRAY STREET



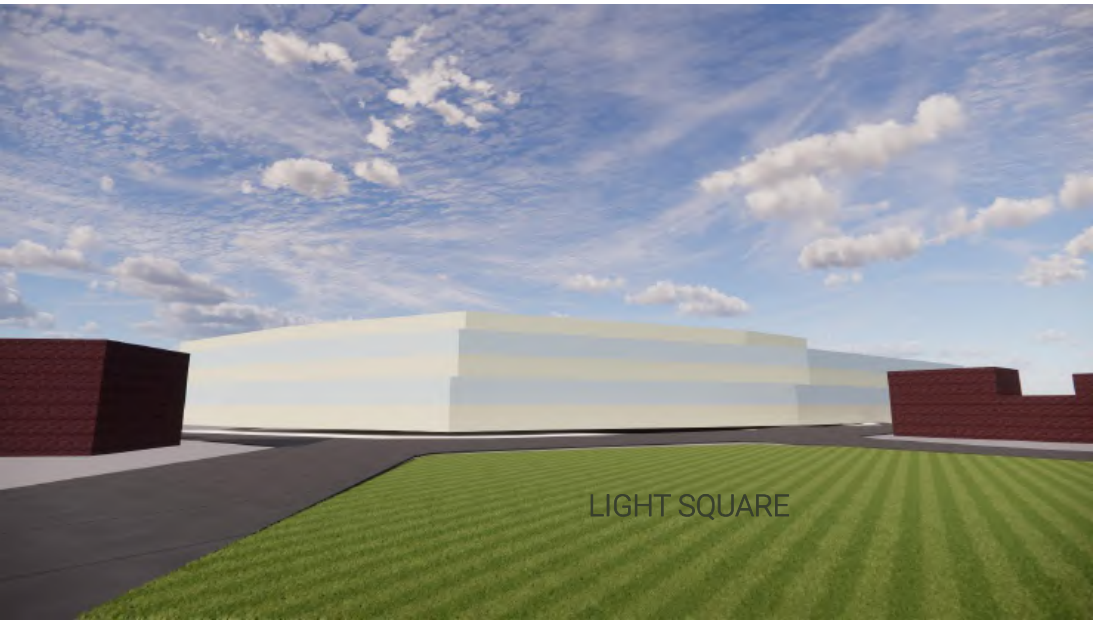
STRUCTURE PLAN
BUILDING VOLUME



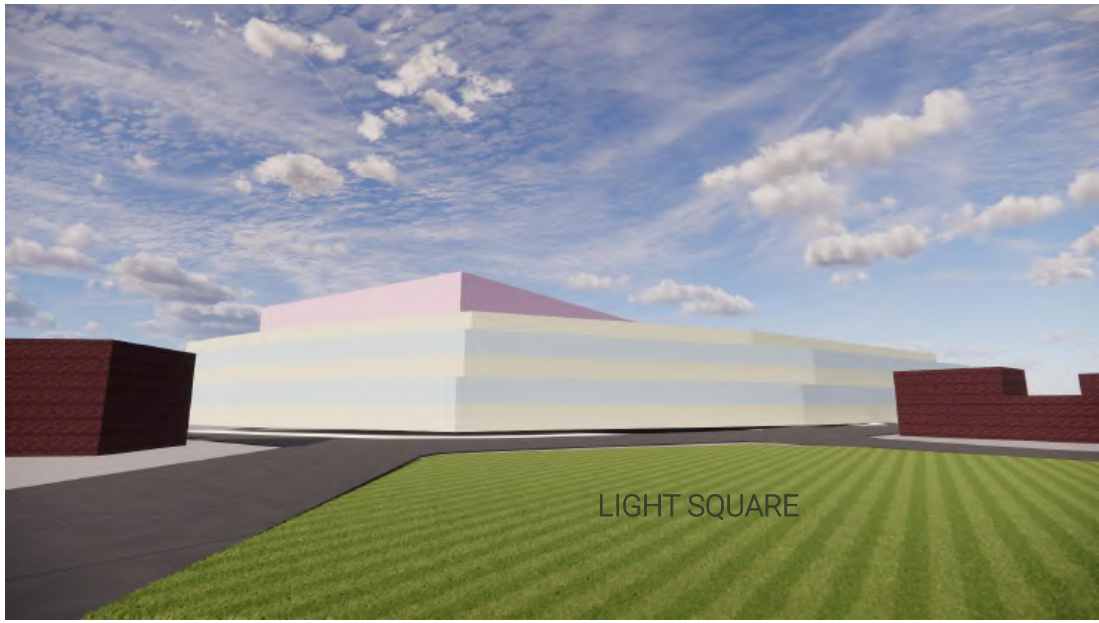
3 ADDITIONAL LEVELS

LEYTON FUNDS

LIGHT SQUARE



STRUCTURE PLAN
BUILDING VOLUME



3 ADDITIONAL LEVELS

Table: Summary of Written Submissions and Response

	Detailed Comment	No. of Mentions	Structure Plan Response
Overall Support			
1.	Supports the vision and the general intent of the Structure Plan.	7	**Noted.**
Planning & Land Use			
2.	Opposed to rezoning Town Centre land for large-format development, noting Gawler already contains multiple supermarkets. The submission suggests the Town Centre should focus on specialist retail, services and smaller-scale businesses.	2	**Noted.** The proposed zoning framework is intended to better reflect the role of the Gawler Town Centre as a District Centre and provide opportunities for a broader mix of land uses, increased residential development and economic activity within the centre. The proposed Urban Activity Centre Zone also provides a more appropriate policy framework for larger-scale commercial and retail activities, noting that bulky goods outlets with a gross leasable floor area exceeding 500m² are not envisaged. There are a range of retail gaps in the Town Centre beyond supermarkets which will require adequate site area for development to occur.
3.	Need to retain recreational vehicle (RV) parking.	1	**Noted.** The comment will be considered as part of future parking and visitor access planning to ensure the needs of visitors and different user groups are appropriately considered. This site also has a significant number of physical constraints including flooding which need to be further considered, likely foreshadowing that the current (temporary) RV parking site is not ideal for significant re-development.
4.	Support for retaining the ambulance service site.	1	**Noted.** Site 2 is no longer required for ambulance services following the relocation of operations to the new purpose-built ambulance station on Main North Road, Willaston, in late 2025. Future use of the site warrants further investigation, noting there are a range of potential future uses that could occur on this land.
5.	Support for accommodation above shops along Murray Street.	5	**Noted.** Thank you for the feedback. Increasing residential and accommodation opportunities within the town centre, including shop-top and upper-level development, aligns with the Structure Plan's objectives to support activity, visitation and economic vitality.
6.	Planning for community services and future needs.	4	**Noted.** The Structure Plan adopts a long-term strategic approach that seeks to identify and responding to the future service, infrastructure and community needs of the town centre.
Traffic, Public Transport and Movement Network			
7.	Feedback provided on specific street designs including High Street, Light Square and Julian Terrace.	4	**Noted. Partial change recommended.** Streetscape designs have not been amended at this stage; however, relevant notations have been incorporated into the refined Structure Plan. Detailed feedback will inform future traffic investigations, modelling and design development.

8.	Adelaide Road and Twelfth Street intersection design support, including a pedestrian refuge island.	1	**Noted.**
9.	Broader regional bypass solutions are required to improve Town Centre traffic.	2	**Noted.** Regional transport planning and bypass investigations continue to be undertaken by the State Government, Council and neighbouring councils.
10.	Suggested improvements relating to increased rail and public transport needs.	4	**Noted.** Public transport planning is primarily led by the State Government. The comments will be considered as part of ongoing advocacy and integrated transport planning discussions.
Infrastructure Planning & Delivery			
11.	Requested greater clarity regarding the infrastructure required to support town centre growth and development, including capacity assessments and staging for delivery.	5	**Noted.** The purpose of the Structure Plan is to establish a strategic land use and development framework for the Town Centre. Detailed infrastructure investigations, capacity assessments and staging plans would typically occur through implementation planning, infrastructure master planning, capital works programming and individual development assessments once Council has endorsed the Structure Plan and its priority projects. Ongoing coordination with infrastructure providers, utility agencies and State Government stakeholders will be required to support future growth.
Building Height and Design			
12.	Development should contribute to a distinctive Gawler character through design, materials and façade treatments, rather than adopting generic contemporary building forms.	3	**Noted.** As part of the project implementation, Design Guidelines will be prepared to provide guidance for new development and adaptive reuse of heritage places. This document will be prepared by specialist heritage architects and urban designers to ensure it reflects the vision and unique character of the Gawler Town Centre.
13.	Referenced the recently approved Ginos development as an example of a lower-height development that can still be financially viable.	1	**Noted.** The approved Ginos development demonstrates that moderate-scale (three-storey) with sub-basement parking redevelopment (making it effectively a four-storey development) can be viable in appropriate circumstances, although outcomes will vary depending on site-specific opportunities and constraints.
Greening			
14.	Support for additional native planting in parks and open spaces.	1	**Noted.** Increasing urban greening, tree canopy and biodiversity, while enhancing public open spaces, is consistent with the objectives of the Structure Plan.

Heritage & Character			
15.	Desire for retention of Gawler's 'old world' character.	2	**Noted.** Protecting and celebrating Gawler's distinctive heritage character and sense of place is a key principle of the Structure Plan. The subzone controls likely to be applied are a key element of ensuring any future development has adequate regard and delivers a street sensitive design that responds appropriately to this character.
Feedback from Heritage SA / DEW			
16.	Streetscape improvements adjoining McKinlay Memorial and Pioneer Park should be integrated with adjoining heritage elements.	1	**Noted. Change recommended.** The Station Precinct Plan is recommended to be updated to include a notation identifying the McKinlay Memorial and Pioneer Park, to ensure any future changes are appropriately integrated with and respectful of their significance and character.
17.	Improved shopfronts, displays (pg 54), signage or street furniture should not dominate or unduly impact on the setting of a State Heritage Place.	2	**Noted.** Any works associated with, or adjacent to, a State Heritage Place would remain subject to relevant planning and heritage assessment processes, including consideration of impacts on heritage values, setting and presentation.
18.	Light Square design should include sufficient setbacks from the roadway to protect the heritage character and setting of Light Square and the Old Bushman's Hotel.	1	**Noted.** The draft Structure Plan included concept transport projects for consultation and community feedback. Should they proceed, further traffic investigations, modelling and detailed design will be undertaken to assess potential impacts and inform future decision-making, including further analysis and design considerations regarding heritage matters.
19.	Streetscape design not included for Murray Street between Walker Place and Bridge Street South.	1	**Noted.** The concept plans included within the Structure Plan are indicative and are not intended to provide detailed design responses for every section of the Town Centre. Further investigation and design work would be undertaken as projects progress.
20.	Light Square's role as a public space and civic destination could be more strongly articulated within the Structure Plan.	1	**Noted. Change recommended.** Light Square is an important public space within the Church Hill State Heritage Area. Minor changes are recommended to the refined Structure Plan to recognise its role as a destination and place for community activation. Notwithstanding, the foreshadowed civil works proposed relating to traffic movement give considerable scope to better achieve the objectives outlined.
21.	Development adjacent to Gawler Central Station and Cowan Street should respond to the heritage values and setting of adjoining State Heritage Areas.	1	**Noted.** The Structure Plan includes illustrative built form guidance prepared with input from heritage and urban design specialists to demonstrate how appropriate interfaces and heritage outcomes may be achieved. These concepts will be refined through future project stages and design processes. The location of the key development site relative to the train station, significant

			site fall from Cowan Street give considerable scope to both respond to the State Heritage Area's historic values and more efficiently use the site than currently occurs.
22.	Significant views and sightlines should be maintained to State Heritage Places.	3	**Noted. Partial change recommended.** The refined Structure Plan Concept Plan should be updated to identify additional key sightlines and vistas. Further technical investigations will explore how planning policy and urban design guidance can support high-quality building design, protect the setting and appreciation of important landmarks and heritage assets, and maintain significant views, while avoiding unnecessary constraints on redevelopment opportunities. Existing heritage listings and policy documents will also be reviewed to ensure that recognised vistas and sightlines have been appropriately considered.
23.	Physical connections between key heritage places should be strengthened and better interpreted.	1	**Noted.** Opportunities to strengthen heritage interpretation, wayfinding and connections between key destinations will be considered as part of future public realm upgrades, visitor experience improvements and future development opportunities.
24.	Include the Former Provincial Gas Company (later SA Gas Co) Gawler Gas Works within Structure Plan mapping due to its proximity to the project boundary.	1	**Noted**. **No change recommended.** The Structure Plan boundary has been established to focus on the Town Centre and its immediate areas of influence. While the Former Provincial Gas Company (later SA Gas Co) Gawler Gas Works is located adjacent to the project area, its proximity alone does not warrant inclusion within the Structure Plan boundary. Any future development affecting the State Heritage Place would remain subject to the relevant Planning and Design Code provisions and heritage assessment requirements.
25.	Support for adaptive reuse to ensure the town centre does not become a "museum-like setting".	1	**Noted.** Encouraging adaptive reuse is a key principle of the Structure Plan and supports ongoing investment, activation and conservation of heritage places.
26.	Support for Movement + Place approach used to inform the Structure Plan.	1	**Noted.**
27.	Requests specific sites suitable for adaptive reuse opportunities be clearly identified.	1	**Noted. No change recommended.** The Structure Plan promotes adaptive reuse as a preferred approach across the entire Town Centre rather than identifying specific heritage buildings. This provides flexibility for landowners and future investment opportunities while ensuring all proposals remain subject to relevant planning and heritage assessment processes. The Built Heritage and Adaptive Reuse Analysis Background Study provide a detailed analysis of each site and its potential suitability for adaptive reuse and has informed the preparation of the Structure Plan.
28.	Request to include all State Heritage Place names within the Structure Plan.	1	**Noted. No change recommended.** Information on State and Local Heritage Places is detailed in the *Built Heritage and Adaptive Reuse Analysis Background Study* and through established

			planning overlays. Any future development affecting a State Heritage Place will remain subject to relevant Planning and Design Code and heritage assessment requirements.
29.	Concern was raised regarding the potential diversion of freight traffic from Murray Street to Reid Street and Cowan Street, including impacts on the State Heritage Area.	1	**Noted.** Heavy vehicles exceeding 5 tonnes are already restricted from Murray Street through existing traffic controls. The current designated route is via Julian Terrace, Reid Street and Cowan Street. The Structure Plan seeks to reinforce and improve the use of designated freight routes rather than direct heavy vehicles through other heritage areas and Murray Street where load limits are currently in place.
30.	Support for improved pedestrian connection between Cowan Street and Gawler Station.	2	**Noted.**
31.	Support for retention of traditional streetscape elements such as kerbing, paving, lighting and signage, including support for replacement using a like-for-like approach to maintain consistency and reinforce the historic identity of the area.	1	**Noted. Partially Supported.** Streetscape character is recognised as an important contributor to the Town Centre's heritage significance and sense of place. Consideration should be given to strengthening guidance regarding heritage streetscape elements, including paving, kerbing, lighting, signage and street furniture. Where upgrades are required, designs should seek to respect and reinforce heritage character while accommodating contemporary accessibility, safety and operational requirements.
Gawler Environment and Heritage Association (GEHA)			
32.	Concern that the Structure Plan prioritises growth over town centre functionality and capacity. The submission requests the Town of Gawler "stabilise growth and rebalance the current trajectory".	1	**Noted.** Population growth projections reflect State Government forecasts and housing targets for the Town of Gawler and the broader Outer North Region, set by the Greater Adelaide Regional Plan (GARP). While Council does not determine the broader regional growth trajectory, it has an important role in planning for and managing how future growth and change are accommodated locally. The Structure Plan provides a long-term strategic framework to help guide this change while considering Town Centre functionality, heritage and character, economic vitality, infrastructure and community needs. Future implementation will be supported by further investigations into matters including infrastructure capacity, traffic and movement, servicing and development feasibility.
33.	Opposition to applying the Urban Corridor (Living) Zone approach to Adelaide Road and recommendation for a sub-zone.	1	**Noted. Change recommended.** The refined Structure Plan retains the Township Main Street Zone for the Adelaide Road precinct. Recommended building heights will be investigated further through a future sub-zone or Technical and Numeric Variations review, with any proposed changes subject to community consultation through a Code Amendment process.

34.	Full support for Gawler Town Centre Sub-Zone.	4	**Noted.**
35.	Submission supports many pedestrian and cyclist movement recommendations and notes many can occur without zoning or building height changes.	1	**Noted.** Many of the proposed pedestrian and cycling initiatives can be delivered independently of zoning or building height changes. However, some public realm improvements proposed are intended to align with and support private investment, helping maximise community benefit and town centre revitalisation. These specific project areas have been identified and carried forward within the refined Structure Plan.
36.	Concern that traffic impacts of future regional growth have not been adequately assessed.	3	**Noted.** The Structure Plan included concept transport projects for consultation and community feedback. Should the Structure Plan be endorsed, next steps include further traffic investigations, modelling and detailed design to assess potential impacts, design development and inform future decision-making.
37.	Larger development should provide car parking onsite, including underground car parking.	3	**Noted.** The Structure Plan identifies opportunities to improve parking outcomes, including support for underground car parking. Generally, the provision of parking will be site specific for each development, depending on slope of the land, local context and the design response. But the design approach suggested is broadly supported. Design guidelines and the code amendment are where parking design is best addressed.
38.	Support for reducing speed limits within the town centre.	1	**Noted.** Improvements to pedestrian safety and movement, including recommendations for reduced vehicle speeds within the town centre, are recognised as important objectives of the Structure Plan.
39.	Support for improved public transport connections and town centre shuttle services.	2	**Noted.** Public transport planning is led by the State Government. The comments will be considered as part of ongoing advocacy and integrated transport planning discussions.
40.	Concern that smaller sites may not be able to accommodate on-site parking and may require additional public parking.	1	**Noted.** Car parking requirements for new development are assessed through the Planning and Design Code. While smaller sites may present challenges for on-site parking provision, public car parks and on-street parking are generally not recognised as satisfying private development parking requirements.
41.	Opposition to building heights above two-storey.	4	**Noted. Partial change recommended.** The Structure Plan identifies opportunities to further investigate building heights in appropriate locations to support mixed-use development, economic activity, housing diversity and Town Centre activation, while recognising the importance of Gawler's heritage character and streetscapes. The Draft Structure Plan included a proposed building height framework for the purpose of seeking community and stakeholder feedback. The framework provided a strategic basis for considering potential built form outcomes rather than representing a predetermined planning policy outcome. Specific references to proposed maximum building heights have now been

			removed pending further investigation. Any future changes to building height or planning policy would be considered through further technical investigations and a future Code Amendment process, including consideration of built form, heritage and character, infrastructure, movement and design outcomes, and appropriate planning policy mechanisms such as subzones. Any proposed Code Amendment would also be subject to the relevant statutory process and further community and stakeholder engagement.
42.	Concern regarding setbacks, overshadowing and built form impacts on heritage streetscapes.	3	**Noted.** The proposed built form interfaces are intended to ensure new development responds sensitively to adjoining heritage places and streetscapes, while supporting appropriate growth and renewal. Existing heritage protections would continue to apply alongside any future planning policy changes and will be investigated further.
43.	Support for adaptive reuse of heritage buildings.	4	**Noted.** Encouraging adaptive reuse of heritage places aligns with the objectives of the Structure Plan.
44.	Recommendation to provide incentives and disincentives to encourage restoration of heritage properties.	1	**Noted.** Opportunities to support heritage conservation and adaptive reuse can be considered through future Council programs, advocacy and partnerships.
45.	Concern regarding impacts of taller buildings on important townscape views and vistas.	4	**Noted. Partial change recommended.** The refined Structure Plan Concept Plan is recommended to be updated to consider additional sightlines for further investigation. Existing heritage listings and relevant policy documents will also be reviewed to ensure identified vistas and sightlines are appropriately considered through any future Code Amendment process. Further technical investigations are also recommended to consider how planning policy and urban design guidance can support high-quality building design, the appreciation of important landmarks and heritage settings, and the management of key views, while avoiding unnecessary constraints on redevelopment opportunities.
46.	Gawler South Council Office not referenced as a heritage place; submission identified a mapping error.	1	**Noted.** The mapping discrepancy reflects an error in the State Government dataset. Council will liaise with the relevant agencies to seek correction of the mapping. As the issue originates from the State mapping, no amendment to the Structure Plan can be undertaken at this time.
47.	Concern that future major retail expansion should occur in emerging regional centres rather than Gawler Town Centre.	1	**Noted.** The Structure Plan seeks to reinforce Gawler Town Centre's role as the region's primary civic, cultural and commercial centre while recognising the complementary role of other activity centres. Analysis undertaken as part of the Structure Plan indicates there is capacity for additional retail and commercial activity within the town centre. Future retail development is expected to respond to market demand and may occur through the expansion and redevelopment of existing centres, while larger format retail development is anticipated to continue locating outside the town centre.

48.	Reference to the Bechervaise & Associates Murray Street Main Street Study (1989).	1	**Noted.** While strategic planning studies naturally become less relevant over time, the report recommendations have been reviewed by the project team. Importantly, the Structure Plan remains strongly aligned with many themes identified in the 1989 study, including strengthening Murray Street, improving pedestrian amenity, managing traffic, celebrating heritage character, enhancing public spaces and supporting long-term town centre vitality, specifically: • Planning changes to support a doubling of the population (projected to reach 26,000) • Need to create between 15,000-20,000sqm of additional retail and commercial floor space to service the population at that time • Recognition that the Coles Central site would likely require further expansion; and • Infill development along Murray Street. The Structure Plan has been informed by the *Built Heritage and Adaptive Reuse Analysis Background Study*, which provides a detailed and contemporary assessment of the town centre buildings, including quality, integrity and opportunities.
49.	Notes that full development of all identified opportunity sites would result in excessive development outcomes.	1	**Noted.** This is an unrealistic scenario and is inconsistent with experience. As stated in the Structure Plan, only a small number of identified opportunity sites are anticipated to redevelop in the foreseeable future. Major site redevelopment is complex and costly and, in many cases, requires lot consolidation. The proposed planning framework is intended to provide flexibility and equitable opportunities for landowners, rather than anticipate redevelopment of all sites. As such, the development yield calculations presented by the submission is considered a theoretical capacity assessment rather than an estimate of likely future development outcomes.
50.	Notes there is no realistic prospect that Gawler Town Centre will cease to be the "Heart of the Region".	1	**Noted.** The Structure Plan seeks to proactively plan for future growth and investment rather than rely solely on market forces to determine future outcomes. This approach allows Council to better coordinate infrastructure, public realm improvements and future investment priorities.
51.	Request improved notation of heritage and representative places on mapping within the Structure Plan.	2	**Noted.** Detailed information on State and Local Heritage Places is provided in the *Built Heritage and Adaptive Reuse Analysis Background Study* and will continue to be available through SAPPA mapping and relevant planning overlays used for development assessment.
52.	Objection to the inclusion of Sites 1 and 2 as a Strategic Site.	3	**Noted. Partial change recommended.** Site 1 is recommended to be removed as a potential strategic site from the Structure Plan. Site 2 remains proposed for future investigation, noting that no change is anticipated before 2041 due to existing lease arrangements.
53.	Omitted construction cost information.	1	**Noted.** The additional information will be provided to project team for consideration.

54.	Bakers Reserve unlikely to be developed due to an existing National Trust covenant.	2	**Noted.** Any existing covenant, heritage agreement or other legal encumbrance affecting Bakers Reserve would continue to apply regardless of future planning policy changes and would need to be considered as part of any future proposal.
55.	Seeks clarity on urban canopy and inclusion of understory planting.	1	**Noted.** The canopy target referenced in the Structure Plan relates to tree canopy coverage, consistent with industry practice. Future landscaping initiatives may also incorporate understory planting and broader greening outcomes where appropriate.
56.	Acknowledgement of Council's inclusion of a GEHA representative on the Business + Community Reference Group.	1	**Noted.**
Landowner Coles Central Site			
57.	Support for the overall vision, strategic directions and key moves of the Draft Structure Plan, including the role of Gawler as a District Centre and the identification of the Gawler Central Shopping Centre as a significant redevelopment opportunity.	1	**Noted.**
58.	Support for the proposed Urban Activity Centre Zone.	1	**Noted.** The proposed zoning framework is intended to better reflect the role of the Gawler Town Centre as a District Centre and provide opportunities for a broader mix of land uses, increased residential development and economic activity within the centre.
59.	Support for the proposed Gawler Town Centre Subzone, subject to further resolution of the overall built height framework.	1	**Noted.** Support for the proposed Gawler Town Centre Subzone is acknowledged. Matters relating to the proposed building height framework are addressed separately within this response.
60.	Support the inclusion within the Railway Station Precinct as a potential location for transit orientated development / integrated mixed-use development.	2	**Noted.**
61.	Request to increase building heights beyond the proposed five storeys. Seeking flexibility to	1	**Noted. Requires further consideration.** The Draft Structure Plan identified a proposed building height framework for the purpose of seeking community and stakeholder feedback. Following

	additional height to facilitate a high-quality built form outcome, improve the feasibility, and deliverability of a comprehensive mixed-use redevelopment. Suggests development of up to eight storeys may be achievable while satisfying the identified built-form parameters.		consultation, specific references to proposed maximum building heights have been removed pending further investigation. The site has characteristics that warrant consideration as part of future built form investigations, including its size, topography and proximity to public transport. However, no specific building height or development intensity is recommended for the site through the Structure Plan at this stage. Any future consideration of increased building height would be undertaken through further technical investigations and a future Code Amendment process, including assessment of built form and interface transitions, heritage and townscape impacts, significant views, solar access, infrastructure, movement and urban design outcomes. Any proposed planning policy changes would also be subject to the relevant statutory process and further community and stakeholder engagement.
62.	Request for a more flexible performance-based approach that would allow additional height where urban design outcomes can be demonstrated.	1	**Noted. Requires further consideration.** The Structure Plan and Planning and Design Code already adopts a performance-based approach through the identification of urban design principles and built-form parameters. However, the recommended height framework remains an important strategic tool for establishing future development expectations and providing certainty to the community, landowners and decision-makers. Opportunities for additional flexibility may be explored as part of any future Code Amendment process, informed by detailed technical investigations and strategic policy considerations.
63.	Request to increase maximum building heights from 14.4m to 15.5m for four-storey buildings and from 17.6m to 19m for five-storey buildings to accommodate floor-to-floor heights and servicing.	1	**Noted. Requires further consideration.** The submitter raises a valid consideration regarding floor-to-floor dimensions for contemporary mixed-use buildings and associated servicing requirements, particularly at the ground level. Floor-to-floor heights and servicing requirements are recommended to be explored as part of any future Code Amendment process.
64.	Request to review requirements related to overshadowing, arguing the controls may be more restrictive than existing Planning and Design Code provisions.	1	**Noted. Requires further consideration.** The protection of solar access to important public open spaces is a key urban design objective of the Structure Plan. Further review is recommended to confirm the appropriateness of the proposed solar access provisions, their consistency with broader Planning and Design Code policy, and whether alternative policy approaches could achieve similar public realm outcomes while providing greater flexibility for redevelopment.
65.	The submitter supports improved pedestrian connectivity but requests that the proposed pedestrian connection be shown	1	**Noted. Change recommended.** The intent of the Concept Plan in this location is to identify a desired pedestrian movement outcome rather than predetermine a detailed development solution. It is recommended the Concept Plan be amended to identify the connection indicatively, allowing flexibility for future site planning and design.

	indicatively rather than as a fixed alignment through the site.		
66.	Requests review of the Concept Plan's distinctive treatment marker.	1	**Noted. Change recommended.** The Concept Plan is recommended to be amended to remove the distinctive treatment marker on the site.
67.	The submitter supports the Concept Plan but seeks a more outcome-focused and less prescriptive approach to redevelopment, circulation, staging and built form.	1	**Noted.** The Concept Plan is intended to provide strategic direction while allowing detailed design solutions to evolve over time. The recommendation for additional flexibility is acknowledged; however, an appropriate level of prescription remains necessary to ensure the Structure Plan's built form, heritage, movement and public realm objectives are achieved. The Concept Plan will continue to be reviewed to ensure it provides sufficient flexibility while maintaining clear strategic direction and certainty regarding intended development outcomes as part of the Code Amendment process.