

ENGAGEMENT REPORT

Section 73(7) of the *Planning, Development and Infrastructure Act 2016*

Riverbank Precinct Code Amendment

By the Chief Executive, Attorney-General's Department



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#17960556

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Executive summary

The Riverbank Precinct Code Amendment (the Code Amendment) seeks to support investment in the new Women's and Children's Hospital and Riverbank Precinct, while ensuring future development is well-managed, consistent and in keeping with the surrounding areas.

These changes will help ensure South Australians have easy access to sporting, health, cultural, environmental and educational facilities along the riverbank.

Consultation was undertaken on the [draft Code Amendment](#) for a period of six weeks from 15 September 2021 to 27 October 2021, giving South Australians and key stakeholders the chance to have their say.

661 written submissions were received regarding the Amendment, with key themes including:

- Concern about development and environmental impacts, as well as impacts on both Kaurna and European heritage in the area
- Concern about development of the new Women's and Children's Hospital (nWCH) and/or associated car park
- Concern about potential future development in areas such as Kate Cocks Park, the olive grove, Pinky Flat / Tarntanya Wama and Adelaide Botanic High School
- Concern about development of a new arena
- Support/positive comments about developing an underutilised site
- Support/positive comments related to the nWCH.

In response, the Chief Executive has recommended the following key changes:

- Remove the Riverbank Subzone, ensuring no change to existing development opportunities along the River Torrens / Karrawirra Pari and Pinky Flat / Tarntanya Wama
- Retain the olive grove in Kate Cocks Park and land west of the Old Adelaide Goal in the Adelaide Park Lands Zone and a portion of Helen Mayo Park within the Adelaide Park Lands Zone, ensuring protection of a greater proportion of the park lands
- Capping maximum building heights in the Health Subzone west of the railway line at 6 building levels
- Including walking and cycling paths through the health and entertainment precincts in a new concept plan
- Align the northern boundary of the Innovation Subzone with the Adelaide Botanic High School to recognise the cultural heritage values of the lands to the north
- Provide greater clarity that residential development is not supported in the Riverbank Precinct
- Change the subzone over the Helen Mayo North and South buildings to the Innovation Subzone, to ensure better integration with the innovation precinct
- Require activation of the ground level of buildings with frontage to the River Torrens / Karrawirra Pari
- Ensure development in the City Riverbank Zone recognises the significance of Karrawirra Pari / Riverbank precinct for traditional indigenous custodians, through authentic and clearly visible means.

1 Purpose

This report has been prepared by the Chief Executive of the Attorney-General's Department (the designated entity) for consideration by the Minister for Planning and Local Government (the Minister) in adopting the Riverbank Precinct Code Amendment (the Code Amendment).

The report details the engagement that has been undertaken, the outcomes of the engagement including a summary of the feedback made, the response to the feedback and the proposed changes to the Code Amendment. In addition, the report evaluates the effectiveness of the engagement and whether the principles of the Community Engagement Charter have been achieved.

2 Introduction

The State Government is progressing initiatives of state significance in the Riverbank Precinct including the development of the new Women's and Children's Hospital (nWCH). The proposed Adelaide Riverbank Arena has also been nominated for the precinct. These initiatives are part of the State Government's wider vision for the Riverbank Precinct as a premier health, entertainment and cultural boulevard and have been the subject of ongoing strategic consideration.

To achieve the wider vision, the Chief Executive has, with the approval of the Minister for Planning and Local Government, initiated a Planning and Design Code Amendment in accordance with section 73(2)(b) of the *Planning Development and Infrastructure Act 2016* (the Act).

Through the Code Amendment investigations, a strategic review was undertaken into the current land uses in the precinct, the current policy and zoning, and the outcomes sought by relevant strategic plans.

As a result of these investigations, the below key changes were proposed and subject to a consultation and engagement process:

- Apply the City Riverbank Zone, Health Subzone to land west of the Royal Adelaide Hospital (RAH) to support the development of the nWCH. While this change impacts the Adelaide Park Lands (park lands), it will facilitate development of an important public facility in a manner which provides unique advantages from co-location with the RAH (including access to clinical services, training, education, research facilities and helipad to provide direct medical retrieval) and direct connections to the park lands and river to benefit patients and visitors.
- Include land west of Montefiore Road in the City Riverbank Zone, Entertainment Subzone to support the development of entertainment-related uses (such as an arena) and also allow for health-related uses to provide an appropriate transition from the Health Subzone to the new entertainment precinct.
- Include the Adelaide Botanic High School in the City Riverbank Zone, Innovation Subzone to more appropriately reflect the land use and form.
- Apply a new Riverbank Subzone in the Adelaide Park Lands Zone to the southern and northern side of the River Torrens / Karrawirra Pari between Kintore Avenue and the Torrens Weir to accommodate appropriate development (both on-water and off-water) that contributes to the activation of the riverfront.
- Update 'Concept Plan 85 – City Riverbank' within the Innovation Subzone to retain the important open space link from Frome Road to the Adelaide Botanic Gardens.
- Amend policy in the City Riverbank Zone to add an arena to envisaged land uses, and seek improved east-west connections through the Royal Adelaide Hospital and over Montefiore Road.
- Insert additional policy within the Health Subzone to provide for an appropriate transition in built form and improved interface with the Park Lands, and adaption and reuse of the Police Barracks and Old Adelaide Gaol in a manner that complements the historic values and park lands setting.
- Insert additional policy within the Entertainment Subzone to also provide for health, education or research type land uses to the west of Montefiore Road adjacent the Health Subzone.
- Insert additional policy in the Entertainment Subzone to ensure that the built form interface of the precinct with the park lands achieves a high amenity, with a transition down in scale to the river, and design to provide an active and appealing edge to the river.
- Insert additional policy within the Entertainment Subzone to maintain connections from North Terrace to the riverbank in the area in front of the Intercontinental Hotel.

- Insert additional policy within the Adelaide Park Lands Zone to enable the development of cycling/pedestrian connections and stormwater infrastructure in a passive and natural landscaped setting.
- Amend City Riverbank Zone, Table 5 – Procedural Matters (PM) – Notification to bring this into line with other City-type zones.

3 Engagement approach

The process for amending a designated instrument (including the process to amend the Planning and Design Code) is set out in the Act. The Act requires public engagement to take place in accordance with the Community Engagement Charter.

The designated entity prepared an engagement plan to apply the principles of the Community Engagement Charter. The purpose of this engagement was to ensure that individuals, businesses, organisations and communities interested in and/or affected by the proposed Code Amendment were engaged in the process of preparing and finalising the Code Amendment.

Engagement on this Code Amendment sought to:

- Raise awareness that a Code Amendment was being prepared.
- Provide information about what was proposed by the Code Amendment including the location of where the proposed changes will apply.
- Enable stakeholders and community to provide feedback on the Code Amendment prior to it being finalised and submitted to the Minister for Planning and Local Government.
- Close the loop with stakeholders and community to inform them of the final version of the Code Amendment.
- Meet statutory requirements as they relate to engagement on a Code Amendment.
- Build relationships and a community of interest to support future activities at the site.
- Maximise the opportunity for the media to be well informed, minimising reporting of inaccuracies.

The engagement period for this Code Amendment ran for six weeks, from Wednesday 15 September 2021 until Wednesday 27 October 2021.

3.1 Engagement activities

The following engagement initiatives were undertaken:

Initial meeting with staff from the City of Adelaide

An initial meeting was held with senior staff from the City of Adelaide on 27 July 2021 to discuss the Code Amendment, investigations undertaken and planned consultation. Council staff were sent consultation material prior to formal consultation commencing.

Written invitation to provide submission on the Code Amendment

The following people and organisations were contacted in writing and invited to provide a submission on the proposed Code Amendment:

Activity	Description and Target Audience
Direct letter/email to owners, occupiers and known leaseholders in and adjacent to the Riverbank Precinct and the affected area	Letters were also sent to directly affected or adjoining landowners/leaseholders in the following precincts subject to rezoning: <ul style="list-style-type: none"> Precinct 1 – SAPOL / Kate Cocks Park / Old Adelaide Gaol rezoning area Precinct 2 – Proposed Riverbank Arena rezoning area Precinct 3 – Adelaide Botanic High School rezoning area Approximately 200 letters were directly mailed or emailed five days before the commencement of public consultation on 15 September 2021.
Letter sent to identified stakeholders	Letters were sent to the following individuals/groups: <ul style="list-style-type: none"> general interest stakeholders¹ high interest stakeholders² Traditional Owners (Kurna Yerta Aboriginal Corporation) City of Adelaide (Lord Mayor) State MP for Adelaide (Hon Rachel Sanderson) state agencies (various) Ministers of relevant state agencies (various) Minister for Planning and Local Government (Hon Vickie Chapman)

Individual briefings on the Code Amendment

Tailored briefings were offered to all high interest stakeholders, state agencies, the City of Adelaide, local MPs and Traditional Owners. The following briefings were undertaken:

Activity	Description & Target Audience
Briefings to key individuals/groups	<ul style="list-style-type: none"> Adelaide Park Lands Authority (APLA) – 26 August 2021 City of Adelaide (Council) – 21 September 2021 Riverbank Entertainment Precinct Advisory Group (REPAC) – 7 October 2021 Commonwealth Department of Agriculture, Water and the Environment (responsible for the EPBC Act) – 18 October 2021 Aboriginal Affairs and Reconciliation staff, Department of Premier and Cabinet (AAR) – 20 October 2021 Reconciliation Committee of the City of Adelaide – 21 October 2021 RAWsa – 1 November 2021 Kurna Yerta Aboriginal Corporation RNTBC – 3 November 2021

¹ The Department sent letters to the following general stakeholders – Art Gallery of SA, SA Museum Board, SA Museum, SA Museum Foundation, Royal Adelaide Zoo, Returned Services League (SA) Inc, Royal Society of SA Inc, Royal Zoological Society of SA Inc, Telstra Corporation Ltd, Adelaide High School, History Trust of SA, Adelaide Uni Sports and Physical Recreation Association Inc, Australian Defence Force, Royal Australian Air Force Association of SA Inc, Vietnam Veterans Association of SA Inc, Combined Ex-Services Mess Association SA Inc, Libraries Board of SA, Department of Infrastructure and Transport, State Governor's Establishment, Department for Communities and Social Inclusion, Renew Adelaide, Jolley's Boathouse Bistro P/L, Lounders Boatshed Café P/L, St Raphael's P/L, Popeye Cruises, Captain Jolley's Paddle Boats, BBQ Buoys, Red Ochre Grill, PAR 3 North Adelaide Golf Course and West End Association.

² The Department sent letters to the following high interest stakeholders – Adelaide Park Lands Authority, Adelaide Park Lands Preservation Association, Riverbank Precinct Advisory Committee, State Planning Commission, State Commission Assessment Panel, Capital City Committee, Green Adelaide, Adelaide Stadium Management Authority, Adelaide Festival Centre, Adelaide Convention Centre, Adelaide Entertainment Centre, Adelaide Venue Management Corporation, Torrens Parade Ground, SA Heritage Council, Adelaide Gaol Preservation Society, Lot Fourteen, Adelaide Botanic High School, Local Government Association and the Commonwealth Department of Agriculture Water and the Environment

Consultation websites (PlanSA portal and YourSAy website)

The proposed Code Amendment documentation and supporting information was publicly available online for the duration of the consultation period. The PlanSA portal and YourSAy consultation website were the primary locations for information and submitting feedback.

A news article and web banner promoting the consultation were also published on the landing page of the PlanSA website, providing greater visibility.



YourSAy page

A dedicated page on the yourSAy consultation website was created to provide a forum for the public to make comment on the Code Amendment.

Activity	Description and Target Audience
YourSAy page	<p>The yourSAy tool allowed people to make comments on a 'guestbook' and a quickpoll was also conducted, asking people:</p> <p>“Do the proposed amendments reflect the vision to create a premier health, entertainment and cultural boulevard?”</p> <p>Yes, I support the proposal Yes, but I have some concerns No, it should not proceed</p> <p>People were directed to the PlanSA web page to make a formal submission.</p>

The yourSAy online consultation was promoted on the PlanSA website consultation page for the Riverbank Code Amendment, as well as yourSAy’s social channels.



Social media campaign

The following social media platforms were used to promote the engagement opportunity and encourage feedback throughout the consultation period:

- PlanSA Facebook
- AGD Twitter.

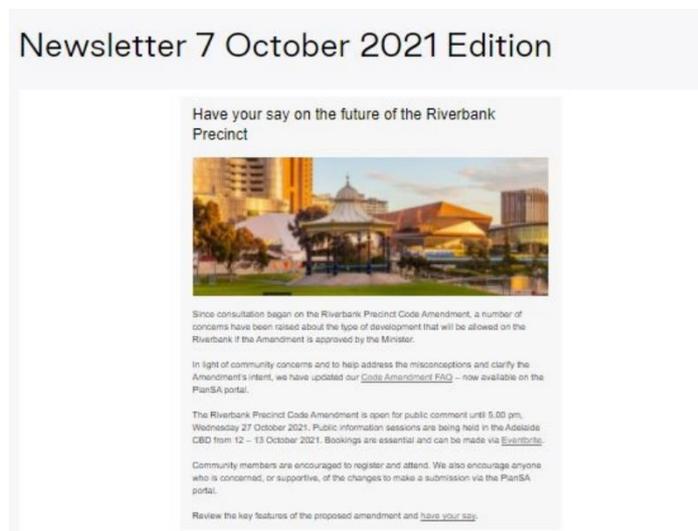


There were 20 social media posts published during the engagement period, with Twitter achieving the greatest reach. There were 14 tweets on the Riverbank Code Amendment, achieving 5379 impressions and 177 engagements, while six Facebook posts achieved a reach of 1676 and 94 engagements.

Planning Ahead newsletter

Planning Ahead is a public digital newsletter prepared by the Planning and Land Use Services division of the Attorney-General's Department. It provides news about the planning system and has 1,845 subscribers (as of 7 October 2021).

An article promoting the engagement opportunity was included in the 7 October 2021 edition.



Information sessions on the Code Amendment

Due to the anticipated interest in the Code Amendment, information sessions were organised over two days and times allocated for those attending (due to COVID-19 restrictions).

Activity	Description & Target Audience
Information drop-in sessions for public/ local residents/ local businesses	<p>These sessions were aimed at all community and stakeholders. 8 sessions were offered across 2 days, detailed below.</p> <p>Tuesday 12 October 2021</p> <p>Session 1 – 4-4.45pm</p> <p>Session 2 – 5-5.45pm</p> <p>Session 3 – 6-6.45pm</p> <p>Session 4 – 7-7.45pm</p> <p>22 attendees across the four sessions</p> <p>Wednesday 13 October 2021</p> <p>Session 1 – 2-2.45pm</p> <p>Session 2 – 3-3.45pm</p> <p>Session 3 – 4-4.45pm</p> <p>Session 4 – 5-5.45pm</p> <p>14 attendees across the four sessions</p>

Availability of consultation materials

The above engagement activities were also supported by the following communications to raise awareness of the Code Amendment:

- Maps showing the areas subject to the proposed rezoning or changes to subzones, a brochure and detailed frequently asked questions document.
- Media release – detailing the Code Amendment, promoting yourSay feedback, opportunity and drop in sessions and how to access more information
- Advertisement in the Advertiser on Saturday 2 October 2021 to publicise the Code Amendment and upcoming information sessions.

The Code Amendment (including supporting investigations), brochure, engagement plan, frequently asked questions document and mapping showing proposed zone and subzone changes were made available at the following places:

- Planning and Land Use Services, Attorney-General's Department, Level 5, 50 Flinders Street, Adelaide
- City of Adelaide Customer Service Centre, 45 Pirie Street, Adelaide
- Various City of Adelaide libraries and local community centres
- Information sessions held during the engagement
- Electronically on the Plan SA website: https://plan.sa.gov.au/en/code_amendments.

Email and telephone enquiries

The PlanSA contact details were provided throughout the consultation period and the public and stakeholders were invited to make contact if they had enquires or wished to set up a meeting to discuss the proposal. 21 enquiries were received.

- Phone: 1800 752 664
- Email: plansa@sa.gov.au

3.2 Mandatory requirements

The following mandatory engagement requirements have been met:

Notice and consultation with council/s

The Community Engagement Charter requires that, a council or councils must be directly notified and consulted on a proposed Code Amendment, where the proposed Code Amendment is specifically relevant to a particular council or councils (and where the council did not initiate the proposed Code Amendment).

The City of Adelaide was engaged in the following ways:

- A letter was sent to the City of Adelaide with notice of the Code Amendment consultation
- A meeting was held with senior staff from the City of Adelaide on 27 July 2021
- A presentation was provided to the City of Adelaide council meeting on 21 September 2021.

Notice and consultation with the Local Government Association

The Community Engagement Charter requires that, the Local Government Association must be notified in writing and consulted, where the proposed Code Amendment is generally relevant to councils.

As this Code Amendment is not generally relevant to councils (rather, only to one council), the Local Government Association did not need to be directly notified and consulted on the Code Amendment, however a letter was still sent advising them of the consultation.

Notice and consultation with owners and occupiers of land which is specifically impacted and adjacent land

Under section 73(6)(d) of the Act, where a Code Amendment will have a specific impact on one or more particular pieces of land in a particular zone or subzone (rather than more generally), the designated entity must take reasonable steps to provide a notice to owners or occupiers of the land (and each piece of adjacent land) as prescribed by the regulations.

Regulation 20 of the PDI (General) Regulations requires such notice to:

- a) identify the piece or pieces of land in relation to which the specific impact will apply; and
- b) describe the impact; and
- c) indicate where and when the relevant amendment to the Planning and Design Code may be inspected; and
- d) provide information about the consultation that is to occur under the Community Engagement Charter.

Owners and occupiers of the land which is specifically impacted were engaged in the following ways:

- Via direct correspondence described in the table in [section 3.1](#) above.

Owners and occupiers adjacent the land which is impacted were engaged in the following ways:

- Via direct correspondence described in the table in [section 3.1](#) above.

Notice of proposal to include local heritage listing to owner of land

The Community Engagement Charter requires that, where a Code Amendment proposes to include a heritage character or preservation policy that is similar in intent or effect to a local heritage listing, the owner of the land on which the places resides, must be directly notified in writing of the proposal and consulted for a minimum period of four weeks.

As this Code Amendment does not include any of these, no engagement to this effect was undertaken.

3.3 Compliance with the engagement plan

The above-described activities were undertaken in accordance with the engagement plan.

The following variances from the engagement plan were noted:

- A letterbox drop to local residents/businesses did not occur given the addresses (either email or post) of owners/occupiers/leaseholders within and adjacent the affected area were obtained, and therefore residents/businesses were given direct notification through other means.
- Although not noted in the engagement plan, a notice was published in the Advertiser on Saturday 2 October 2021, and additional social media content was published, to boost attendance at information sessions.
- The evaluation survey sent to respondents did not seek feedback on whether they were confident their views were heard during the engagement. It was considered inappropriate to ask this question immediately following the close of the consultation period given that the participants had not yet had a chance to review the engagement report, and had not been advised how the Code Amendment had been amended in response to their feedback.

It is noted that post-consultation activities set out in the engagement plan to 'Inform of outcome' and 'Closing the loop and reporting back' are still in progress, pending final determination of the Code Amendment.

4 Evaluation of engagement

To ensure the principles of the Community Engagement Charter (the Charter) are met, an evaluation of the engagement process for the Code Amendment has occurred.

4.1 Performance indicators for evaluation

The minimum mandatory performance indicators have been used to evaluate engagement on the Code Amendment. These measures help to gauge how successful the engagement has been in meeting the Charter's principles for good engagement.

Evaluation of engagement by community members

The following performance indicators required an evaluation of responses from members of the community on the engagement. This includes an evaluation of whether (or to what extent) community members felt:

1. That the engagement **genuinely sought** their input to help shape the proposed Code Amendment.
2. They were given an adequate **opportunity to be heard**.
3. They were given **sufficient information** so that they could take an informed view.
4. **Informed** about why they were being asked for their view, and the way it would be considered.

There was a strong response to the request to provide feedback on the engagement process. The evaluation was undertaken through an online survey provided by email to those who lodged a submission or attended information sessions. Overall, the link to the survey was distributed to 724 email addresses.

The results of the evaluation are contained in [Attachment 1](#) to this engagement report.

Evaluation of engagement by the designated entity

A further evaluation of the engagement process is required to be undertaken by (or on behalf of) the designated entity. The minimum performance indicators require an evaluation by the designated entity of whether (or to what extent) the engagement:

1. **Occurred early enough** for feedback to genuinely influence the planning policy, strategy or scheme.
2. **Contributed to the substance** of the final draft Code Amendment.
3. **Reached those identified** as communities or stakeholders of interest.
4. **Provided feedback to community** about outcomes of engagement.
5. Was **reviewed throughout** the process and **improvements put in place**, or recommended for future engagement.

The evaluation of the engagement was undertaken by the Strategic Communications Unit of the Attorney-General's Department (AGD), on behalf of the designated entity.

4.2 Evaluation against the Charter principles

The following is a summary of the evaluation of the engagement against the five principles of the Charter. The full results of the evaluation can be found in [Attachment 1](#) to this engagement report.

(1) Engagement is genuine

People had faith and confidence in the engagement process

Prior to the consultation, an initial meeting was held with senior staff from the City of Adelaide to discuss the Code Amendment, investigations undertaken and planned consultation. Council staff were sent

consultation material prior to formal consultation commencing, and a pre-consultation briefing was provided to the Adelaide Park Lands Authority.

The engagement was publicly promoted on two websites, promoted through media and social media, a print advertisement and letters to stakeholders identified as having an interest in the Code Amendment.

Opportunities for one-on-one briefings were communicated, and a number of communication materials were developed to help people understand what was proposed, including frequently asked questions, a brochure, and maps.

Evaluation statement	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
I feel the engagement genuinely sought my input to help shape the proposal	23%	27%	25%	23%	2%

(2) Engagement is inclusive and respectful

Affected and interested people had the opportunity to participate and be heard

People could provide feedback on the proposal in multiple ways, both online (two websites), through information sessions, in written submissions and by email. One-on-one briefings were offered to a range of stakeholders. Information sessions were scheduled during the day and evening to ensure those with commitments during the day could attend. Presentations were given to the City of Adelaide and initial meetings held with senior council staff, prior to the engagement taking place.

Evaluation statement	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
I was given an adequate opportunity to be heard	18%	16%	33%	30%	3%

(3) Engagement is fit for purpose

People were effectively engaged and satisfied with the process

People were clear about the proposed change and how it would affect them

A range of communications materials were prepared to help explain the proposed changes, including maps showing the current and proposed zoning and subzones, a frequently asked questions document, a brochure and information panels on display at information sessions. AGD planning staff attended the information sessions to speak to community members and answer questions.

Evaluation statement	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
I was given sufficient information so that I could take an informed view	19%	17%	29%	33%	2%

(4) Engagement is informed and transparent

All relevant information was made available and people could access it

People understood how their views were considered, the reasons for the outcomes and the final decision that was made

The role of community engagement in shaping the Code Amendment, and the steps involved in the Code Amendment process, were clearly outlined in communications. Respondents were advised that their feedback would be summarised and published at the conclusion of the consultation period.

Evaluation statement	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
I felt informed about why I was being asked for my view, and the way it would be considered.	20%	24%	29%	25%	2%

(5) Engagement processes are reviewed and improved

The engagement was reviewed and improvements recommended

Respondents were to complete an evaluation survey of the engagement, as outlined in the above sections. During the engagement period, regular project meetings were held to discuss opportunities for improved understanding and greater reach e.g. revised frequently asked questions, increased promotion of information sessions to boost awareness and attendance, and additional contact with key stakeholders.

5 Engagement outcomes

5.1 Public submissions

661 public submissions were received for this Code Amendment engagement during the consultation period. These ranged from one line of text, to detailed written submissions covering a range of issues. Due to the high number of submissions, in order to best analyse the results of these, they have been categorised into themes. These themes are further explained in [section 6](#) of this report. Many respondents raised more than one theme, and all have been counted.

The most commonly raised issues were concern about development on the park lands generally, concern about environmental impacts on the park lands and concern about impacts on sites of European heritage value. Each of these issues received hundreds of mentions within the public submissions. The table below shows the breakdown of submission by themes and the percentage of submissions which identified these issues:

Issue identified in submissions	No. of submissions which raised issue	% of submissions which raised issue
Concern about development on the park lands generally	577	87%
Concern about environmental impacts on the park lands	410	62%
Concern about impacts on sites of European heritage value	306	46%
Concern about impacts on sites of European heritage value: <ul style="list-style-type: none"> Concern about nWCH (new hospital site) Concern about nWCH (associated car park site) 	49 31	7% 5%
Concern about particular sites being considered in the Code Amendment/or subject to future development: <ul style="list-style-type: none"> Concern about arena site and/or Helen Mayo Park Concern about Pinky Flat / Tarntanya Wama site Concern about olive groves impact (Kate Cocks Park site) Concern about Botanic High Site (or land just south) 	88 40 11 5	13% 6% 2% 1%
Concern about the process or scope of the Code Amendment	55	8%
Concern about impact on sites of Kaurua cultural value or importance	54	8%
Concern about impacts on infrastructure / public access	38	6%
Neutral comments / suggested alternatives	54	8%
Positive comments/supportive <ul style="list-style-type: none"> nWCH Arena 	14 5	2% 1%
Positive comments/supportive of proposal generally	12	2%
Positive comments/supportive of developing an underutilised site	8	1%

5.2 Organisations' submissions

31 submissions from organisations or individuals representing groups were received. Many of these submissions were very detailed and reflect a great investment of time and resources. The following section of this report provides a summary of the salient points of these submissions and should be read in conjunction with the full submissions so that they can be wholly understood and considered. All submissions are included in [Attachment 9](#).

5049 Coastal Community Association

The 5049 Coastal Community Association (5049CC) is a member of the Community Alliance of South Australia and aims to support development which enhances the sustainability of the community and environment. The 5049CC believe that consultation on the Code Amendment is flawed for reasons including:

- Consultation does not comply with the Community Engagement Charter and the timeframe is too short.
- The restricted scope of influence is in effect an information only notification to the general public making the consultation disingenuous.

The 5049CC request that the Minister defer decision and develop a thoroughly consulted, well informed and progressive Master Plan before endorsing the Code Amendment.

Adelaide BioMed City Board

The Adelaide BioMed City Board represents partners The South Australian Health and Medical Research Institute (SAHMRI), The University of Adelaide, University of South Australia, Flinders University, The RAH and The Women's and Children's Hospital (WCH). Adelaide Biomed City (ABMC) are generally supportive of the Code Amendment. They suggest the following enhancements:

- Provide greater specificity on improvements to connectivity and access between the city and park lands including over the railway lines.
- More detail on active transport (by foot and cycle) and public transport connections with ABMC to Lot 14, the railway station, and the hospitals.
- Add the railway yards to the Entertainment Subzone, to allow opportunity for future development in this area, which will in turn improve connectivity.

The ABMC note that they are supportive of the inclusion of the gaol and barracks site in the Code Amendment. They are also supportive of the proposed nWCH car park.

Adelaide Gaol Preservation Society Inc.

The Adelaide Gaol Preservation Society Inc. (AGPS) is a not-for-profit organisation which seeks to promote and preserve the old Adelaide Gaol as an educational museum, tourist attraction and valuable heritage place. The AGPS is opposed to the Code Amendment.

AGPS highlights concerns with the impact of development in proximity of the old Adelaide Gaol and SAPOL Barracks. Specific reference was made to intention of the Code Amendment to facilitate the re-purposing of existing buildings. The submission cites concerns that buildings will be demolished or sold or would be unable to be adapted without impacting on the balance of the Gaol. Specific reference is made to the potential impact that development in this precinct may have upon both the European heritage and Kaurna heritage, including burial grounds.

AGPS nominate alternate locations for the construction of the new Women's and Children's Hospital.

Adelaide Park Lands Association

The Adelaide Park Lands Association (APLA) is a not-for-profit community-based organisation that describes itself as a 'watchdog' to guard the Adelaide Park Lands. The APLA expressed opposition to the Code Amendment, highlighting the following:

- The unique nature of the park lands will be impacted by the Code Amendment and impact on this unique character of the park lands.
- Future development across the four subzones will result in a loss of open green space.

The APLA provides specific endorsement to the submissions made by both Australia ICOMOS and Community Alliance SA.

Australia ICOMOS

The International Council on Monuments and Sites (ICOMOS) is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. Australia ICOMOS is one of many national committees established for this purpose.

Australia ICOMOS is opposed to the implementation of the Code Amendment and prepared a position paper as part of their submission which seeks to address a range of long-term issues for the effective protection and management of the park lands.

The submission made by Australia ICOMOS has been summarised across the key themes identified therein as follows:

National Heritage Place Listing

- Provides an overview of values that gave rise to the National Heritage listing of the park lands
- Notes that the park lands does not have a stand-alone conservation management plan or heritage management plan. Rather, reliance is placed on the Adelaide Park Lands Management Strategy and Planning and Design Code, neither of which specifically address the management of the park lands national heritage values.
- Highlights that the Planning and Design Code does not include a specific overlay, nor mapping applicable to National Heritage places.
- Cites the long and complex history of the park lands along North Terrace, recognising that activities have occurred within land designated in the National Heritage listing and outside of the listed area, however within the setting of the National Heritage Place.
- Notes the previous consideration of the SA Heritage Council on potential listing of the park lands as a State Heritage Area.

Riverbank Code Amendment overview

- Recognises that the Code Amendment's applicability to the park lands, both areas held as a National Heritage Place and those outside however part of the park lands as defined in the *Adelaide Park Lands Act 2005*.
- Highlights the amendments proposed to intended land use list within the Code as enabling substantial development within the park lands both in terms of type and height.

Overarching Issues for the Adelaide park lands and city layout

Australia ICOMOS highlights a number of key issues resulting from the Code Amendment that will affect the park lands including:

- Incremental and substantial development pressure within and adjacent the National Heritage Place which may have adverse impact on the heritage values.
- The erosion of the open and landscape qualities of the park lands in vicinity of Bonython Park arising from major buildings and roadways.
- The inclusion of land uses which are not consistent with the general character of the park lands or result in an imbalance of uses which may affect the overall landscape character and heritage values.
- Significant concern has been expressed by the Code Amendment's potential to place development pressure on the park lands, recognising there is no established carrying capacity for the park lands.
- Recognition that there may be a requirement for a self-assessment and referral under the EPBC Act.
- Uncertainty in relation to the proposed approvals process following rezoning.
- Identifying the absence of a conservation management plan for the National Heritage Place.
- Highlighting the need to carryout heritage impact assessments for proposed future works in or adjacent to the National Heritage Place.

Subzone content

Australia ICOMOS has provided comments on the health, entertainment, riverbank and innovation subzones. Comments relate to:

- Loss of park lands arising from future development.
- Impact of future development on the National Heritage place and State Heritage Places.
- The impact of proposed maximum building heights on the park lands landscape.
- Inconsistency of land uses with the park lands landscape.
- The potential for impact on the Kurna community arising from development of Pinky Flat / Tarntanya Wama which is identified as a place of significance.
- Impact upon Colonial Light's grid layout and the impact of this on the National Heritage Listing.
- Lack of sound rationale for the rezoning of the Adelaide Park Lands Zone to the Innovation Subzone.
- The need to ensure there is no disturbance within Frome Park/Nellie Raminyemmerin Park which contains fully authenticated and documented Kurna Aboriginal burial site.
- Recognition of pre-existing site contamination.

Recommendations

In opposing the Code Amendment, Australia ICOMOS made a series of recommendations including:

- Deferral of the Code Amendment pending resolution of fundamental issues related to the future protection and management of the park lands.
- Undertake consultation with the Kurna community.
- Establish the carrying capacity of the park lands which defines the extent and character of sympathetic development consistent with the protection of the national heritage values.
- Undertake a strategic assessment under the EPBC Act.
- Review how city, state and commonwealth systems can achieve greater coherence in the protection and management of the National Heritage Place, assisting in identifying obligations under the EPBC Act.
- Preparation and public release of heritage impact assessments for proposed works in or adjacent to the National Heritage Place.
- Preparation of a conservation management plan for the National Heritage Place.

Australian Hotels Association SA

The Australian Hotels Association (SA) provides qualified support the Code Amendment, noting:

- Support for the rezoning of land that will enable development of a multipurpose arena, recognising the potential the arena will have in attracting visitation
- Acknowledgement of the need to rezone park lands to enable development of the new Women's and Children's Hospital in proximity of the Royal Adelaide Hospital.
- Opposition to the application of the Riverbank Subzone to the north of the River Torrens / Karrawirra Pari. Concern is expressed that the economic benefits of this change will not flow appropriately if new food and beverage offerings are developed in this location, and such change will exacerbate the already challenging business environment. Government focus should be directed to reviving the existing hospitality sector across the CBD.

Australian Institute of Architects

The Australian Institute of Architects (AIA) are the peak body representing the architecture profession. They raise a lengthy and detailed series of concerns about the Code Amendment in its current form. The main points of their submission are summarised below.

General comments:

- That Adelaide's park lands are world recognised, confirmed by their National Heritage listing.
- That the community do not support development in the park lands.
- That the park lands are valued for their recreational, cultural, and environmental contribution.
- That the precincts that the Code Amendment allow for future development at a density and scale that is inappropriate in the park lands and undermines their value as natural feature.
- That the Code Amendment is worded too ambiguously, which may result in detrimental development outcomes, and ultimately, poor outcomes for the city.
- That the Code Amendment is not underpinned by a coordinated long term vision for the Riverbank, and there is a need for master plans to be prepared for each precinct.
- That the Code Amendment is not compliant with some State Planning Policies relating to engagement with Traditional Owners, supporting biodiversity, water sensitive urban design, climate change resilience, heritage, public and active transport.
- That open space is highly valued and necessary, particularly in context of strategies around urban consolidation.
- That the Code Amendment runs contrary to the commitment to Adelaide as a National Park City.
- That sites that require remediation, should be remediated, and that this not be the reason that future development should be justified.
- The need for a heritage overlay and preparation of conservation management plans for the State Heritage Places within the affected area.
- That the cultural importance of the Riverbank area to Kaurna people needs to be better integrated into Code policies.
- That early engagement with the broader public should be expanded to ensure it aligns with the Community Engagement Charter.
- The AIA suggests the Code Amendment should be put on hold to allow for further consultation and investigations to be undertaken.

Specific comments on subzones:

City Riverbank Zone:

- Expansion of subzone to include existing park lands is not supported.
- Accommodation should only be temporary (ie hotel), not permanent.
- Over height provisions should be removed.
- Expansion of the biomedical precinct beyond the current area is not supported, as this is effectively privatisation of public space.

Cultural Institutions Subzone:

- There are more appropriate locations for student housing, and this should not be contemplated in this subzone.

Entertainment Subzone:

- That it should focus on entertainment uses that create vibrancy, and as such health, education and research facilities not be permitted.
- Extension west of Montefiore Hill is not supported and should be retained for green landscaping and small scale activation.

Health Subzone:

- Health and research facilities do not contribute to the activation or use of public space by the public and the expansion of these is not supported. However, were this to expand over the rail lines, it would be supported.

- Adaptive reuse of sites like the gaol and barracks should be in keeping with their heritage value.
- Heights proposed are not supported and seen to be inappropriate.
- Car parking at the approach to the gaol is not supported.

Innovation Subzone:

- The Code Amendment should directly reflect the Lot 14 master plan – suggesting that this should be an assessment tool.
- Density proposed is not suitable, and may work against connectivity between Frome Street and the Botanic Gardens.
- Retail and tourist accommodation is not supported. Commercial development should be small scale to support existing uses.
- Height and use of transition policies are questioned as being consistent with other policies.
- Parking provisions should be more specific to ensure good outcomes.

Riverbank Subzone:

- Development of the north bank of the Torrens is not supported due to there already being sufficient space and tenancies available on the south bank. It should remain park lands zone.
- Further small scale development of south bank is supported.

Australian Institute of Landscape Architects

The Australian Institute of Landscape Architects, South Australian Chapter (AILA SA) is the professional body that represents South Australia's Landscape Architects. AILA SA is opposed to the proposed car park associated with the new Women's and Children's and is concerned that the current master plan and Adelaide Park Lands Management Strategy does not appear to be referenced or used. AILA is not opposed to considered development within the Riverbank Precinct however, a holistic master plan focusing on spaces between developments is required.

Relevance and acknowledgement of the Adelaide Park Lands Management Strategy 2015-2025 (APLMS)

- AILA supports development in the Adelaide Park Lands that is consistent with the values outlined in the APLMS which is a requirement under the *Adelaide Park Lands Act 2005*. However, there is concern that key objectives and zone changes have not been tested or assessed against the APLMS due to there being no mention of the document in proposed changes and documentation.
- It is unclear how First Nations people have been engaged on the Code Amendment and there is no reference of significant or identified cultural heritage in documentation. The early, respectful meaningful and inclusive engagement with First Nations is highly important prior to any changes being proposed.

New Women's and Children's Hospital

There is concern that a broader contextual and spatial analysis of the hospital is lacking. The proposed car park and associated bridge over the rail line is not supported. Salient points include:

- Little to no recognition of the biodiversity, habitat and importance of Karrawirra Pari
- Potential to retain, celebrate the cultural and historical significance similar to the adaptive reuse outcomes in the Lot Fourteen Precinct.
- Lack of integration with the intent of the ALPMS and recognition of the *Adelaide Park Lands Act 2005*.

Broader Riverbank Precinct

AILA raised that there are some components of the Code Amendment that have not been given appropriate consideration, these include:

- No inclusion and assessment towards connectivity, amenity, natural features, integrating biodiversity and habitat
- The Entertainment Precinct does not specify minimum open space requirements, maximum development heights.
- Is not supported with a thorough spatial analysis of future development patterns.
- A broader contextual and spatial analysis of the precinct is lacking.
- No clarity if retail development is envisaged and that small scale entertainment land uses are unobtrusive along the river's edge.
- Lack of reference to the involvement and direction from Green Adelaide in relation to Karrawirra Park and the impacts on habitat and biodiversity.
- Unclear how the Code Amendment impacts or influences on the State Government's advocacy for Adelaide to become a National Park City.

Australian Rail Track Corporation

The Australian Rail Track Corporation (ARTC) manage and maintain rail assets for freight and passenger trains across five states of Australia. Their submission is neutral with regards to the Code Amendment (subject to concerns being addressed). They state in their submission that they are concerned that the extension of the Health Subzone may have implications on their operations. They are seeking clarity that the Code Amendment will not restrict the rights and obligations of ARTC in managing the interstate Rail Freight Network, including any future development over the land.

Botanic Gardens and State Herbarium

The Board of the Botanic Gardens and State Herbarium of South Australia is a State Government statutory authority that oversees governance of these assets. The Board is in support of the inclusion of Precinct 3 (Innovation Precinct). Key reasons for this support include:

- The proposal will create a focal point in the east end with an emphasis on innovation, education, research and tourism. These values align closely with the institutions strategic aims.
- The resulting precinct will maintain pedestrian and open space links between Frome Road and Adelaide Botanic High.

City South Association

The City South Association represents the interests of resident, businesses and property owners in the southwestern quadrant of the Adelaide CBD. They are opposed to the Code Amendment. They provide a detailed submissions which raises many points, with the salient issues being:

- That the park lands are highly valued for a range of reasons, including health and wellbeing, and should not be decreased through development.
- That the Code Amendment conflicts with other legislation such as the Park Lands Act, and it is unclear how this can override this act, as it runs contrary to that Act.
- That it encourages economic activity to the north of the city, impacting viability of businesses in the south of the city.
- That it impacts on a range of European and Kaurna heritage sites, including the gaol, olive grove and Pinky Flat / Tarantanya Wama.
- The City South Association support the bid for the Adelaide Park Lands to become a world heritage site, and believe this Code Amendment undermines this bid.
- That the consultation process has not been thorough enough – suggesting all city residents and business owners should have been written to, and that greater public debate should have been encouraged. They are also concerned about the lack of engagement with Kaurna representatives.

Committee for Adelaide

The Committee for Adelaide is a not-for-profit membership-based organisation with an objective of making Adelaide the most liveable city. The Committee for Adelaide is supportive of the Code Amendment. Specifically, they support the use of the Entertainment and Riverbank Subzones to activate the river frontage while protecting the park lands. The committee recognise that current events take year-round activation and support creating a policy environment that allows for more permanent, vibrant spaces particularly in the evenings, provides a range of economic and safety benefits. They are also keen to see increased connectivity for pedestrians, cyclists as well as other forms of mobility.

Community Alliance SA Inc.

The Community Alliance SA (CASA) represent 30 resident groups in South Australia. They are opposed to the Code Amendment. They make the following key points:

- The consultation does not comply with the Community Engagement Charter
- That the documents including the Code Amendment are complex for the broader public and require high level of professional planning knowledge
- The PlanSA portal is difficult to access
- That it has not been made clear that these proposed changes will replace existing planning policies
- The scope of influence over the Code Amendment is too narrow – and is effectively, information only
- That engagement was not early enough
- That the preceding strategic reviews that inform this Code Amendment have not been presented
- That the historical and cultural significance of the park lands as being for public use must be retained
- That the Code Amendment envisages a significant change in land uses, that are not supported by the group
- That the park lands should be retained for active and passive recreation and events, and not developed
- That the Code Amendment would allow for future development which would sever a valued walkway along the river
- There are site contamination issues and a Kurna burial site on Frome Park that restrict future development
- That open space in the city is essential for city residents and should be protected for reasons include biodiversity, physically and mental wellbeing and climate change.

Conservation Council SA

The Conservation Council SA is a not for profit organisation representing 60 environment and conservation organisations in South Australia – comprising around 90,000 members. The Conservation Council SA is opposed to the Code Amendment. The salient reasons are as follows:

- That it erodes Colonel Light's vision for the Adelaide Park Lands and is contrary to the *Adelaide Park Lands Act 2005*
- That it would allow for significant development, and this is proposed in the absence of a master plan
- That consultation with Kurna representatives has been inadequate, and that this area is of significant value to First Nations people
- That open space in the park lands should be preserved.

Environmental Defenders Office

The Environmental Defenders Office represents the interests of resident, businesses and property owners in the south-western quadrant of the Adelaide CBD. The EDO is opposed to the Code Amendment. Focus points of the submission included:

- Retention of open spaces for the community and the enhancement not detracting from the unique features. Public access and greening projects should be encouraged rather than the development of buildings.
- The engagement process is not consistent with the Community Engagement Charter.
- The amendment contradicts the seven statutory principles of the *Adelaide Park Lands Act 2005*.
- The proposal does not give sufficient weight to retaining the cultural and historical importance of the park lands.
- Policy is not consistent with the desired outcomes in the Planning and Design Code, namely the Adelaide Park Lands Zone.
- The building policies are inappropriate and would have significant visual impact to the area including state heritage buildings (Adelaide Gaol and the Thebarton Police Barracks).
- The Entertainment Subzone enabling a transition in scale towards the river which does not align with illustration provided for consultation.

In addition, the EDO notes that the rezoning will impact upon an educational Kurna heritage interpretation tour that utilises the narrow stretch of park lands created from disused rail lands to the area south of the weir.

History Council of SA

The History Council of South Australia (HCSA) is an independent, non-government body comprised of individuals, cultural, academic and government institutions, local libraries, museums, and historical societies. The HCSA is opposed to the Code Amendment.

The submission made by HCSA provides an historical overview of the park lands establishment and significance, along with recognition of the Park Lands National Heritage listing in 2008 and the 2018 recommendation to list the park lands on the State Heritage List. The HCSA raises objections to the proposed acquisition and rezoning by the State Government where it decreases the park lands. Namely, objection is raised to the following elements:

- Rezoning land from Adelaide Park Lands Zone to City Riverbank Zone (Health Subzone) – new Women’s and Children’s Hospital.
- Rezoning land from Adelaide Park Lands Zone to City Riverbank Zone (Entertainment Subzone) – Multipurpose arena.
- Rezoning land from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone) – land adjacent Adelaide Botanic High School.
- Application of the Riverbank Subzone to land north of the River Torrens / Karrawirra Pari – retail and hospitality activities.

Separately, the HCSA provides the following comments:

- Development of natural areas is disrespectful to the Kurna community as there remains little undeveloped Kurna land in Adelaide
- The park lands play an important role in addressing the local impacts of global warming by reducing temperatures and retaining water.

Kurna Yerta Aboriginal Corporation RNTBC

The Kurna Yerta Aboriginal Corporation RNTBC (KYAC) is the registered native title body corporate for Kurna People and is one of the peak Traditional Owner organisations who have an interest in the land subject to this Code Amendment.

The following provides a high-level summary of the points made in the submission:

Cultural Importance of the River Torrens to Kurna

It is acknowledged in the submission that the River Torrens or *Karrawirra Pari* (our Red Gum Forest River) is an important part of yerta, their cultural landscape and the ongoing relationship and obligations between

Kaurna people, culture and country. The submission emphasises that *Karrawirra Pari* has mythological and spiritual significance for Kaurna people.

Engagement on the Code Amendment

Overall, KYAC do not consider that an appropriate process of engagement between Kaurna and the State Government has occurred in relation to the Code Amendment as it hasn't allowed KYAC to consult with their broader membership group. KYAC indicate that engagement should have commenced at a much earlier stage and comprises a more open and collaborative dialogue with the State Government.

Notwithstanding the concerns identified here, the KYAC submission does acknowledge and appreciate recent efforts made to open a dialogue with the KYAC on the changes proposed through the Code Amendment – this has included meetings with the Minister for Planning and Local Government and the Department to discuss in greater detail the Code Amendment changes. These meetings / briefings have enabled KYAC to then provide a more informed submission.

Overall position taken with the Code Amendment

The KYAC has indicated that it does not support the Code Amendment as it was released for public consultation for the following key reasons:

- It is inconsistent with Kaurna cultural values and vision of the park lands as an important environmental green space.
- It is inconsistent with the Adelaide Park Lands strategy and also the proposal for Adelaide to be recognised as a National Park City (which KYAC has endorsed).

KYAC has made the following comments in relation to each of the key zoning changes proposed by the Code Amendment as outlined in greater detail below.

Precinct 1 – expansion of the Health Subzone to Old Adelaide Gaol / SAPOL Barracks / Kate Cocks Park

KYAC support the proposed zoning changes in this location to facilitate linkages to the nWCH (including new car park) and broader health precinct.

KYAC also support the repurposing of heritage listed buildings in this Precinct (Gaol and Barracks) but consider that any future change to use of these buildings be directed by further community engagement with Kaurna people being a key participant in any future process.

Precinct 2 – expansion of the Entertainment Subzone to the area west of Montefiore Road

KYAC observes that the location of the proposed Adelaide Riverbank Arena is on a cultural heritage site. It is in this context that the organisation broadly acknowledges that there will be mixed views within the Kaurna community as to the appropriateness of this development occurring at this particular location. It is therefore considered that early engagement with the local Kaurna people should occur prior to the development occurring, consistent with the *Aboriginal Heritage Act 1988*.

In terms of amendments to the Code Amendment, the KYAC has recommended the following key changes to this Precinct:

- Retention of a green buffer between the proposed Adelaide Riverbank Arena footprint and Karrawarra Pari.
- Reducing the extent of the proposed Entertainment Subzone to minimise impacts on existing vegetation / open space west of the Adelaide Riverbank Arena site and to maintain a natural riverine corridor.
- Policy included to ensure that Kaurna people, cultural and country are celebrated in the development and operation of the Adelaide Riverbank Arena.

Precinct 3 – expansion of the Innovation Subzone to the Adelaide Botanic High School

KYAC has confirmed that it supports the rezoning of the Adelaide Botanic High School site to Innovation Subzone but has also requested that the northern boundary of the expanded Subzone be realigned with the extent of the current built form of the school to maintain this area within the Adelaide Park Lands Zone. This is due to the cultural values of this land.

Precinct 4 – inclusion of the new Riverbank Subzone in the Adelaide Park Lands Zone

The inclusion of the new Riverbank Subzone within the Adelaide Park Lands Zone is the part of the Code Amendment that is of most concern to KYAC. This is due to the area's significance for Kurna people as a key location for continued cultural enrichment / nurturing and attachment to country. Pinky Flat / Tarntanya Wama is a location of particular cultural importance and an area where the Kurna people would like to continue to restore and enrich through developing wetlands, walking trails and interpretative facilities.

It is for this reason that the KYAC submission expresses concerns about the intent of the new Subzone to open up this area for small scale development. KYAC consider that this area should be retained as open space with only limited development allowed on the southern side of the river consistent with redevelopment of existing buildings / facilities only.

Kensington Residents' Association

The Kensington Residents' Association represents the interests of residents of the Kensington Village. The Kensington Residents' Association are opposed to the Code Amendment. They see the park lands as an asset for all South Australians, and do not support any further alienation, development or commercialisation of the park lands. They highlight the historical significance of Colonel Light's plan that has created a unique asset for Adelaide and that the park lands should be retained for the use of all the community.

National Trust of South Australia

The National Trust of South Australia has over 6000 members and volunteers across South Australia who collectively work to protect, preserve and promote the state's built, natural and cultural heritage. The National Trust of South Australia are opposed to the Code Amendment.

The Trust provide the following reasons for their opposition:

- It would damage sites of European and Kurna heritage value and importance within the park lands.
- It would undermine the status of the park lands on the National Heritage list.
- They are concerned about impacts due to loss of trees and increased urban warming as a result of development.
- They state that the consultation process was inadequate – particularly with Kurna representatives.
- They strongly advocated that the park lands should not be developed on for these purposes.

The North Adelaide Society

The North Adelaide Society Inc. represents members who advocate for the culture, character and heritage of future development that comprise Adelaide as a city. The society is opposed to the Code Amendment with salient points being:

- Interface within the area must be taken seriously with any changes guaranteed to enhance and not detract/be of detriment.
- The Code Amendment undermines the value of the park lands.
- The society notes support in enhancing and activating the Adelaide Park Lands however, do not agree that the proposed rezoning aligns with the principles outlines in the *Adelaide Park Lands Act 2005*.

- The introduction of high rise-built form will detract from, and undermine, the land economics and commercial zones of the city.
- The car park associated with the new hospital is not supported. The land use is not a genuine well-considered use of the park lands.
- Community land should remain for community use, not for the allowance of a new arena.
- The locality of the proposed new hospital is unfit, not only due to the park lands, but also the proximity of two iconic State Heritage sites. The hospital, car park and associated bridge will have detrimental impacts to these heritage sites and park lands.
- Although there may be some underutilised areas of the park lands, this isn't reason to rezone. Instead, the focus should be on making a public investment to create more accessible public open spaces within the park lands.
- The proposed subzones are not supported as they do not articulate the enhancement of these sites as for park lands purposes but rather for built form.
- The inclusion of the proposed Riverbank Subzone is not supported as temporary events are able to evidently activate the area and operate under the current zoning rules and do not violate the principles of the *Adelaide Park Lands Act 2005*.

Property Council of Australia

The Property Council of Australia represents the full spectrum of the property industry and is a strong public advocate for sustainable economic growth and opportunity. The Property Council supports the progression of state significant infrastructure in the Riverbank Precinct, however, does not support private residential development in the Entertainment Subzone. Salient points of their submission include:

- Potential rezoning of land west of Montefiore Road from Adelaide Park Lands Zone to City Riverbank Zone, Entertainment Subzone to continue the stimulation of visitor spending.
- The proposed amendment at this site will continue to encourage a diverse range of land uses that connect the city centre to the natural environment.
- The inclusion of 'arena' as an envisaged land use under the City Riverbank Zone is supported.
- Improved east-west connections within the City Riverbank Zone, Entertainment subzone are welcomed.
- Support is expressed to the proposal to rezone land to facilitate development of the new Women's and Children's Hospital as it is a form of adaptive reuse of the already developed lands of the Police Barracks and Old Adelaide Gaol. This support is expressed where development complements the historic values and park lands setting.
- Comment that for any loss of park lands, an equal or greater amount of park lands space be rejuvenated to improve biodiversity, tree canopy and ecological outcomes.

Prospect Residents Association

The Prospect Residents Association represents residents of Prospect and makes representations on matters that affect the local government area and environs. The association is opposed to the Code Amendment with key points of objection including:

- The Code Amendment does not meet the statutory principles of the *Adelaide Park Lands Act 2005*.
- The proposed desired land uses will introduce a large range of development that is currently not permitted within the Park Lands, including an arena.
- The proposal will result in the loss of trees and open space.
- The Code Amendment is in direct conflict with Minister Spiers' "Greening SA Program".

The proposed subzones are not supported for the following reasons:

- The Code Amendment will allow deemed-to-satisfy developments which don't require public consultation.

- The changes will permit the allowance of permanent infrastructure on the riverbank. Current activities are managed under existing planning conditions and revert to Park Lands upon completion of the event, this process should remain.
- The changes are a contradiction to the promise of returning land to the Botanic Gardens
- There is a lack of consideration towards significant Kurna sites

The Association does not support the development of the new Women's and Children's Hospital, noting there is a lack of information on the footprint and impacts on the surrounding area, including the heritage setting. Additionally, the car park to be constructed in Park 27 is highly opposed.

Rachel Sanderson MP

The Hon Rachel Sanderson MP is the State Member for Adelaide. Her submission highlights the key issues that her constituents have raised with her, including:

- That the Adelaide Gaol, barracks and olive grove should not be included in the Code Amendment.
- That the nWCH car park will result in the loss of open space and should be located elsewhere.
- That only the land required for the arena be rezoned, and that the remaining areas of Helen Mayo Park remain as Adelaide Park Lands Zone, with no subzone applied.
- That Frome Park should not be included in the Code Amendment due to contamination, a known Kurna heritage site and access to Botanic Gardens.
- That areas north of the river should not be rezoned, but retained as open space, with access to Kurna heritage sites maintained and respected.
- That the Adelaide Park Lands are unique in the world and should be retained.
- That the Code Amendment may jeopardise the World Heritage bid for the Adelaide Park Lands or for Adelaide to become a national park city.
- That open space is highly valued for environmental reasons, as well as physical and mental wellbeing.
- The significance of the Riverbank area to the Kurna people is also acknowledged.

Residents for Environment and Character Conservation

The Residents for Environment and Character Conservation (RECC) is opposed to the Code Amendment. The RECC has raised specific objections to the proposal as it seeks to erode the Adelaide Park Lands which are important to Adelaide's unique character, liveability and contribute to reducing heat and pollution. The submission refers to the broader loss of green space and character buildings throughout Adelaide.

Riverside Rowing Club

The Riverside Rowing Club (RRC) occupies a location fronting the River Torrens / Karrawirra Pari in proximity of the proposed multipurpose arena. The RRC has not specifically identified support or objection to the Code Amendment, rather citing key elements for consideration as follows:

- The land occupied by the club will be included in the proposed Entertainment Subzone. Concern is raised that policy setting applicable to this subzone will not enable development of new RRC facilities, despite previous commitments to accommodate the RRC within the new multipurpose arena development. Namely, the RRC highlights that 'rowing facilities' are not identified specifically within the Subzone's Assessment Provisions.
- The RRC identifies the application of a new Riverbank Subzone within the Adelaide Park Lands Zone as an excellent proposal, commenting that it appears that this subzone overlaps with the Entertainment Subzone. On this basis, the RRC seeks amendments to proposed policy to enable the development of rowing facilities in this location.

Royal Society of South Australia Inc.

The Royal Society of South Australia represents the place of science and scientists in the South Australian community and is opposed to the Code Amendment. The proposal does not align with the society's vision to encourage the community of South Australia to value knowledge and its application for a sustainable future. Further key points of concern regarding the Code Amendment include:

- The resulting detrimental impact to the natural environment which has known benefits for human wellbeing.
- The reduction of the natural environment is a lost opportunity to intensify efforts towards green infrastructure to combat climate change mitigation and heat alleviation.
- The development will jeopardise the value of the Adelaide Park Lands and Riverbank. Liveable cities are not generated by masonry and metal structures.
- Designated areas for creating and growing technology driven industries hasn't been overly successful in South Australia, citing the Northern and Southern Adelaide Technology Parks.
- The Code Amendment will result in fragmentation of habitat, loss of eco-system services and risk increase of voracious fauna.
- Parts of the Riverbank are in need of better management however, these areas should not be regarded as easy sites for development.

South Australian Police Historical Society

The South Australian Police Historical Society (SAPHS) was established for the purpose of collecting, recording, maintaining and promoting the history of the SA Police. SAPHS is opposed to the Code Amendment, raising concerns that the rezoning of the Thebarton Police Barracks will:

- Impact upon the continued operation of the site for policing purposes
- Impact upon the long-term occupancy of the SAPHS at the site. SAPHS notes that the museum is housed within buildings contained in the Thebarton Police Barracks complex which remain under the general management of SA Police. This arrangement provides security to the museum's collection and contributes to the visitor experience.

South West City Community Association Inc.

The South West Community Association (SWCCA) represents residents and community in the South West Quadrant of the City of Adelaide. The SWACCA does not support the Code Amendment and raises significant concern about the loss of another 70 hectares of park lands for more development.

The SWCCA highlights that the proposed desired outcomes that seek to facilitate development of the riverbank in a manner which is small scale, sensitive and of high design quality will blend new developments with the riverbank. It was clearly stated by the SWCCA there is no development that is superior to a natural riverbank setting.

The SWCCA does not support the proposed site for the New Women's and Children's Hospital, with salient reasons being:

- The site results in a building footprint which is too small and will result in difficult pedestrian and vehicle access.
- It is located under a flight path which restricts design and increases building costs.
- Additional facilities such as the car park will severely impact State Heritage buildings.

Tourism Industry Council SA

The Tourism Industry Council SA (TiCSA) is South Australia's peak tourism industry body, representing over 1000 tourism businesses. TiCSA is supportive of the Code Amendment on the basis that this support relates only to those elements that contribute to tourism and the visitor economy. Particularly, the submission relates

to the Entertainment Precinct and Active Waterfront Precinct only. TiCSA has not considered nor holds a position on the other elements of the Code Amendment. Specific policy comments made include:

- Entertainment precinct – in addition to facilitating additional food and beverage opportunities, the policy setting should facilitate activations that deliver desirable visitor experiences.
- Active Waterfront Precinct:
 - the policy setting should also facilitate activation that delivers desirable visitor experiences.
 - questions whether additional policy is warranted to ensure visitor and pedestrian safety within the precinct enabling its activation after dark?
- City Riverbank Zone – supports the inclusion of ‘arena’ as an intended land use and recognises that there may be merit in reviewing land use definitions to broaden the definition of entertainment venue to enable development of any type of venue providing for visitor experiences.

University of Adelaide

The University of Adelaide owns a property which is home to the Helen Mayo North and South Buildings within the current Cultural Institutions Subzone. The university does not specifically oppose or support the Code Amendment, rather it seeks inclusion of these building within the Innovation Subzone. The rationale contained in their submission is as follows:

- All other land on the eastern side of Frome Road will be transferred to the Innovation Subzone.
- The exclusion of the Adelaide Uni buildings does not represent orderly development when the function and character of these buildings provides an education focus through innovative activities and functions. This is consistent with the activities occurring within the Innovation Subzone, particularly Lot Fourteen.
- The current Cultural Subzone does not provide the provision for development potential in regard to the building height if the site were to be redeveloped in the future.

Urban Development Institute of Australia (SA)

The Urban Development Institute of Australia (UDIA) SA is a membership-based representative body for the South Australian development sector. The UDIA is supportive of the Code Amendment. The UDIA are keen to see that the park lands are used for the benefit of South Australians.

5.3 City of Adelaide and Adelaide Park Lands Authority Submissions

City of Adelaide submission

The City of Adelaide is the local government authority directly impacted by the proposed Code Amendment. In this respect, the City of Adelaide has provided a very detailed submission which has been informed by advice provided by the Adelaide Park Lands Authority.

While expressing overall opposition to the Code Amendment progressing to approval, the City of Adelaide’s submission provides detailed commentary against a range of key issues. The City of Adelaide’s submission is contained in [Attachment 9](#).

The following provides a high-level summary of the points made in the submission and should be read in conjunction with the full submission provided by the Council:

Community Engagement Charter:

Council submits that the Code Amendment consultation has failed to meet the requirements of the Community Engagement Charter (the Charter) and therefore the Code Amendment should not proceed any further until the Charter has been properly and appropriately met. Council have questioned the effectiveness of the Code Amendment process in relation to Principle 4 of the Community Engagement Charter – namely that “Engagement is informed and transparent”.

Council considers that the Code Amendment released for consultation does not include significant information and investigations that would enable understanding of the proposed policy changes.

In this context, the Council submission recommends that the Lord Mayor write to the Minister for Planning and Local Government requesting an independent review of the Community Engagement Charter processes and its effectiveness be undertaken in relation to the Code Amendment.

Timeframe for Consultation:

Council considers that the six week timeframe provided by the engagement plan for feedback is inadequate considering the State-wide importance of the Adelaide Park Lands and the need to afford sufficient time for professional experts and lay people to provide meaningful responses to the draft changes.

Council also recommends that targeted, genuine and culturally appropriate consultation occur with the Traditional Owners prior to any decisions being made on the Code Amendment. Time and resourcing should be considered by AGD – PLUS to support any additional consultation.

Inconsistency with the *Adelaide Park Lands Act 2005*:

The outcome of the Code Amendment is inconsistent with the statutory principles of the *Adelaide Park Lands Act 2005* and the Adelaide Park Lands Management Strategy which seek to return developed land to park lands.

The removal of land from the Adelaide Park Lands Zone proposed in the Code Amendment sets up a planning framework which is inconsistent with the park lands values. This could include an increase in buildings of significant scale, less emphasis on open space and public use which, in turn, will lead to alienation of public land.

Investigations:

a) Alignment with State Planning Policies

The State Government has not fulfilled its obligations under the *Planning, Development and Infrastructure Act 2016* for the Code Amendment to be informed by full and proper investigations.

In particular, insufficient investigations and responses have been provided in relation to the State Planning Policies (SPP), particularly with reference to SPP 4: biodiversity, SPP 5: climate change and SPP 7: cultural heritage including consideration of:

- SPP 4: Biodiversity – increasing built form, and thus removing vegetation from the park lands and potentially impacting habitat or known species found within Park 27
- SPP 5: Climate Change – the park lands have a cooling effect and minimise the urban heat island effect of surrounding built form areas.
- SPP 7: Cultural Heritage – the Adelaide Park Lands are nationally heritage listed and also of great significance to the Kaurna people.

The City of Adelaide Submission also emphasises its proposal to list the Adelaide Park Lands and city layout as a State Heritage Area and World Heritage Area.

b) Insufficient documentation provided

The following critical information was omitted from the consultation materials associated with the Code Amendment:

- Assessment tables (allocating policies from the Planning and Design Code to be applied to specific anticipated developments).

With no public notification required for any development types within the zones and subzones proposed in the Code Amendment, Council considers that providing the relevant marked up assessment tables was critical for understanding the impacts of the proposed policy changes.

c) Lack of master plan underpinning the Code Amendment

Council considers that it is a challenge to consider the proposed policy changes in the absence of a broader current master plan.

Council requests that the State Government finalise and release a current master plan for the entire Riverbank Precinct to inform the public of the vision for this area based upon thorough investigations undertaken consistent with the State Planning Policies.

The master plan should be undertaken in conjunction with the City of Adelaide and the process should occur prior to any planning policy changes being implemented.

d) Infrastructure constraints / analysis

The Code Amendment does not recognise that much of the areas proposed for rezoning are current park lands, with limited provision of transport, stormwater, lighting, utilities and safety infrastructure.

The infrastructure analysis provided within the Code Amendment does not adequately acknowledge that development within the proposed zones and subzones may require significant augmentation of infrastructure.

Referral of the Code Amendment to the Commonwealth Department of Agriculture, Water and the Environment:

Council has indicated that the State Planning Commission (the Commission) should have regard to any comments made by the Commonwealth Department prior to any further action being taken on the Code Amendment.

Precinct 1 – expansion of the Health Subzone to Old Adelaide Gaol / SAPOL Barracks / Kate Cocks Park:

The City of Adelaide does not oppose the location for the new Women's and Children's Hospital.

However, the Council does not support the Code Amendment's proposed extension of the City Riverbank Zone, Health Subzone to Kate Cocks Park to facilitate a new car park associated with the new hospital and potentially other commercial buildings to a height of 15 storeys.

Council also does not support the broader rezoning due to the following reasons:

- There is unique biodiversity located within this area.
- The extended Subzone does not provide any policies or vision to connect the area back to the core Central Business District.
- Development within the area may limit the capacity and type of future events in Bonython Park.

The additional built form that the Code Amendment would allow is also considered to be at odds with the *Adelaide Park Lands Act 2005* and Management Strategy.

Council therefore does not support any additional built form on Kate Cocks Park and recommends that the State Government consider alternative locations and design options to provide car parking to the proposed new hospital.

Precinct 2 – expansion of the Entertainment Subzone to the area west of Montefiore Road:

Council has indicated neither support nor opposition to the proposed extension of the Subzone in this location – but does acknowledge that an arena, with active uses at ground level may be appropriate, but only if there is no net loss of park lands.

Council advises that the policies and zone boundaries with respect to this location, which may enable development of an arena or similar, must take into account the impacts on the park lands, transport, access and safety (particularly if development is likely to involve night-time events and liquor licensed venues).

Biodiversity provision and protection is also important in this Precinct to reduce the impacts of the urban heat island effect and maintain the ecological connectivity (corridors) of the park lands. For example, there are several hollow-bearing trees (that are used for nesting) that cannot be replaced by revegetation projects surrounding new built form.

Investigations of innovative ways to provide city green space, and minimise loss of existing significant biodiversity should be undertaken to determine whether any design aspects may be appropriate in this location and result in no net loss of park lands. One option canvassed by Council is the provision of new recreational space over the rail corridor.

Precinct 3 – expansion of the Innovation Subzone to the Adelaide Botanic High School:

The City of Adelaide does not support the extension of the Innovation Subzone to the proposed location.

Council asserts that there has been no valid reason given for the rezoning of this site from Adelaide Park Lands Zone. The School has existing land use rights and if the intent is to retain the open space link then there is no need to rezone this area.

Council also considers that the rezoning of Frome Park / Nellie Raminjemmerin puts it at risk as it enables the transition from open green space to an ancillary area for Lot Fourteen and the Adelaide Botanic High School.

However, Council would support the inclusion of this area as a designated open space link on a concept plan to be applied in the Adelaide Park Lands Zone (rather than the Innovation Subzone).

Precinct 4 – inclusion of the new Riverbank Subzone in the Adelaide Park Lands Zone:

The City of Adelaide does not support the Riverbank Subzone for the following reasons:

- The area is already significantly activated with events under the current zoning and is an area of unique views and vistas.
- The subject area is of cultural significance to the Kaurna people – in particular Pinky Flat / Tarntanya Wama and the adjacent Adelaide Oval area which, together formed an important camp site and corroboree ground.
- It provides important native habitats that require conserving and is inconsistent with a proposal for in-line wetlands proposed for the Torrens Lake.
- Additional built form and canopy loss will negatively impact on the important cooling effect of the park lands at this location.
- There is a lack of clarity about the term 'on-water development'.

Council also advises that increasing permanent built form and development within the Subzone areas will have significant implications for access, parking provision and impacts on and integration with existing pathways and services within the precinct.

If activation is the core reason for the proposed Subzone, the City of Adelaide submits that events, activation, business opportunities and more can occur under the existing Adelaide Park Lands Zone.

Adelaide Park Lands Authority submission

The Adelaide Park Lands Authority (APLA) is principally an advisory body on park lands matters, which also prepares the Adelaide Park Lands Management Strategy. It has its own charter.

As indicated above, APLA's comments on the Code Amendment assisted the City of Adelaide in preparing its own submission, so many of the comments identified in the APLA submission are the same. However the following high level issues have been identified in the APLA submission on the Code Amendment:

Inconsistency with the *Adelaide Park Lands Act* and Management Plan:

APLA asserts that the Code Amendment is at odds with the seven statutory principles of the *Adelaide Park Lands Act 2005* which was developed in the early 2000's.

The purpose of the Act was to "establish a legislative framework that promotes the special status, attributes and character of the Adelaide Park Lands; to provide for the protection of those park lands and for their management as a world-class asset to be preserved as an urban park for the benefit of present and future generations".

Under the Management Plan adopted by the City of Adelaide and the State Government in 2017, APLA asserts that it is incumbent on the Board, Council and the State Government to prevent the erosion of open space and to protect and nurture the park lands.

Inconsistency with the National Heritage Listing of the Adelaide Park Lands:

The inclusion of the Adelaide Park Lands on the National Heritage List is evidence of the Park Lands importance to Adelaide's identity and to the Nation's heritage.

The park lands (and the City Plan) were both listed as they were considered to be "substantiall intact and reflect's Light's design with high integrity".

In this context, APLA considers that the Code Amendment would seriously undermine the integrity of the park lands and further enable the commodification of our public land.

Assessment against the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act):

APLA requests that the State Government undertake a strategic assessment of the Code Amendment under the EPBC Act before progressing the policy changes to ensure the policy directions are consistent with the heritage values of the National Heritage Place.

Lack of master plan to guide the Code Amendment:

APLA asserts that it is difficult to understand the State Government's vision for the Riverbank Precinct without a current master plan.

APLA urges the State Government and the City of Adelaide to engage, finalise and release a current master plan for the entire Riverbank Precinct. This process should occur prior to any planning policy changes being implemented.

Riverbank Subzone:

APLA does not support the creation of a new subzone over the River Torrens / Karrawirra Pari to the north and south banks of the Adelaide Park Lands for the following reasons:

- The City of Adelaide already leases a number of buildings within the precinct for cafes, restaurants etc.
- Many large or small events are already held in Elder Park, Pinky Flat / Tarntanya Wama, Barr Smith Walk and elsewhere each year to make the riverbank a well activated site - all of this already occurs under the existing planning provisions.
- The area is of cultural significant to the local Kaurna people and should therefore be respected and left free from permanent built form.

Health Subzone:

APLA does not oppose the location of the new Women's and Children Hospital but is opposed to the proposed extension of the Health Subzone to accommodate a new car park and other land uses associated with the new hospital adjacent the Old Adelaide Gaol and the SAPOL Barracks.

The proposed form and scale of development at this location is at odds with the spirit and provisions of both the statutory principles of the Adelaide Park Lands Act and the Management Plan.

APLA urges the State Government to work with the City of Adelaide to impement the vision of the Management Plan for Kate Cocks Park (Park 27) and transform the area into a beautiful park setting to complement the Gaol area.

Entertainment Subzone:

APLA advises that an arena, with active uses at ground level may be appropriate for this precinct , but only if there is no net loss of park lands.

One option may be to build over railway lines at this location to provide a new recreational space and no net loss of park lands.

Innovation Subzone:

APLA asserts that there has been no valid reason given for the rezoning of the Adelaide Botanic High School + Frome Park / Nellie Raminemmerin site to City Riverbank Zone and Innovation Subzone.

The new zone and subzone is not required as the high school has existing land use rights.

The rezoning puts Frome Park at risk as it enables the transition from open green space to an ancillary area for Lot Fourteen and the high school.

5.4 Commonwealth agencies / bodies

Two submissions on the Code Amendment have been received from the following Commonwealth agencies / bodies:

- Australian Heritage Council
- Commonwealth Government Department of Agriculture, Water and the Environment

The Australian Heritage Council is the principal advisor to the Australian Government on heritage matters.

The Commonwealth Government Department of Agriculture is responsible for administering the EPBC Act.

Commonwealth Department of Agriculture, Water and the Environment (DAWE) submission

The department notes that a number of matters protected under the EPBC Act potentially occur in the area of the Riverbank Precinct. A compilation of these potentially protected matters is provided in the Protected Matters Search Tool (PMST) report (attached with the DAWE submission).

Departmental guidelines are also available to determine when a referral is required under the EPBC Act.

Australian Heritage Council (AHC) submission

The AHC submission considers that the proposed Code Amendment and the development it facilitates will severely compromise the values on which the National Heritage Listing is based, will be at odds with that listing and, in particular, the facilitated developments would likely trigger a requirement for referral under the EPBC Act.

The AHC provided further detailed comment on the Code Amendment under the following broad headings:

National Heritage Listing:

AHC confirms that both the Adelaide Park Lands and city layout are included as a place in the National Heritage List by Gazettal of 4 Nov 2008 under the provisions of the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and is therefore protected as a Matter of National Environmental Significance (MNES).

AHC asserts that the Code Amendment will establish a master plan for the nominated precinct which in turn will facilitate developments in the park lands Riverbank Precinct. These new developments will alienate park land within the heritage listed boundaries.

Legislation:

AHC is of the opinion that the Code Amendment will likely see development of the park lands contrary to the spirit and detail of the *Adelaide Park Lands Act 2005* and contrary to the intention of Light's vision.

The EPBC Act provides for National Heritage Listing and protection of nominated places and for agreed management plans to be implemented to protect those places. The park lands were found to meet six of the nine criteria and amply qualify for listing that was supported by the South Australian Government and widely by the South Australian Community.

Key concerns identified:

- The loss of park lands.
- The transfer of open space to building sites.
- The diminution of the continuity of the encircling park lands.
- The further interruption of view corridors.
- The undermining of Light's vision.
- The establishment of a damaging precedent.
- The prospect of a universally loved community asset becoming a focus of division.
- Legitimising processes which implicitly value treasured park lands as a zero-cost asset and available for exploitation.
- Devaluing the park lands overall.
- Lowering the bar of protection standards for the park lands.
- Eroding the magic of an intergenerational legacy.
- Devaluing the story of an Adelaide hero.
- Failing to value the international status of the park lands and city layout
- Generating uncertainty about core community social infrastructure.
- Underestimating community aspiration for the park lands
- Compromising the enlightened and progressive reputation of SA.
- Moving the line on acceptable interventions in the park lands
- Giving insufficient voice to indigenous community views.
- Undermining a key Adelaide brand.
- Placing insufficient priority on National Heritage listing.
- Disrespecting the commitment of all those, professionals and volunteers, whose work and passion is the park lands, and that of their predecessors.
- Shrinking a highly valued community park lands asset without compensation.
- Allowing poor management of land to become a precursor to its alienation.

5.5 YourSAy poll

YourSAy was used as an additional mechanism to raise awareness of the consultation, to provide information, and provide multiple ways of providing feedback.

The page received over 3500 visits, and key documents including the information brochure, frequently asked questions and the Code Amendment received hundreds of downloads. Over 1200 people participated in the quick poll, with more than 200 taking the time to leave detailed comments in the guestbook. Contributors were invited to proceed to the PlanSA website to lodge a formal submission, however the sentiment and comments made as part of this quick poll are summarised below.

When asked “Do the proposed amendments reflect the vision to create a premier health, entertainment and cultural boulevard?” the following responses were received:

99 (8.1%) - Yes, I support the proposal

91 (7.4%) - Yes, but I have some concerns

1037 (84.5%) - No, it should not proceed

5.6 Media interest

There has been considerable media interest in the Code Amendment through various articles / opinion pieces in the Adelaide Advertiser, InDaily, City Mag as well as other media outlets (including television and radio).

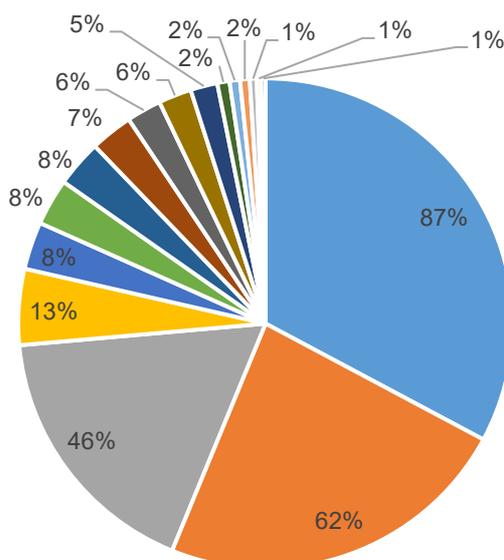
Of note, an online poll contained within the Adelaide Advertiser article *‘Commercial development on River Torrens will be allowed under new zoning for Riverbank Precinct’* demonstrated alternate views to sentiments expressed through the yourSAy website. To the question ‘Should private bars or cafes be able to operate on parts of our parklands in the Riverbank Precinct?’, 71% of respondents answered ‘Yes, it would see more people out enjoying the parklands’ while 29% answered ‘No, our parklands are sacred - not a commercial opportunity’.³

³ As at 3 November 2021 out of 1512 votes

6 Engagement themes: summary, response and recommendations

Given the large number of submissions received on this Code Amendment, engagement has been analysed thematically. The most frequently made comments can be themed in the following ways, and each of these are further described in greater detail below.

Key topics raised in submissions on the Riverbank Precinct Code Amendment



- Concern about development on the park lands generally 87%
- Concern about environmental impacts on the park lands 62%
- Concern about impacts on sites of European heritage value 46%
- Concern about arena site and/or Helen Mayo Park 13%
- Concern about the process or scope of the Code Amendment 8%
- Concern about impact on sites of Kaurna cultural value or importance 8%
- Neutral comments / suggested alternatives 8%
- Concern about nWCH (new hospital site) 7%
- Concern about Pinky Flat site 6%
- Concern about impacts on infrastructure / public access 6%
- Concern about nWCH (associated car park site) 5%
- Positive comments/supportive of nWCH 2%
- Positive comments/supportive of proposal generally 2%
- Concern about olive groves impact (Kate Cocks Park site) 2%
- Positive comments/supportive of developing an underutilised site 1%
- Concern about Botanic High School site (or land just south) 1%
- Positive comments/supportive of Arena 1%

6.1 Concern about development on the park lands generally

The most frequently made comments in submissions received related to a general opposition to changes in planning policy that allow for development in the park lands. There are strong sentiments amongst respondents that the park lands have a critical role in the city as providing highly valued open space which is cited to provide a range of benefits including recreation, leisure, and amenity. The park lands are highly valued as providing a positive contribution to physical and mental wellbeing for the city's residents and visitors.

Several respondents urged that the park lands should not be alienated further but be protected for future generations. Some saw the Code Amendment as leading to the commercialisation of a public asset. Many were concerned that if this Code Amendment permits a new hospital and arena, that it creates a precedent and a 'slippery slope' for allowing further development in the future.

Response:

In response to the substantial amount of submissions raising concern with the potential loss of park lands, significant changes are recommended for the Minister's consideration. These are discussed in more detail in the below recommendations, but in summary include:

- Removal of the proposed Riverbank Subzone in its entirety.
- Pulling back the Health Subzone to retain the olive groves in Kate Cocks Park, and land immediately west of the Old Adelaide Gaol, in the Adelaide Park Lands Zone.
- Pulling back the Entertainment Subzone to retain the western end of Helen Mayo Park in the Adelaide Park Lands Zone.
- Introducing a Concept Plan to show how pedestrian and cycling links will be preserved and enhanced through the western part of the Riverbank Precinct.
- Pulling back the northern end of the Innovation Subzone in accordance with a request of the KYAC to recognise the cultural values of this land.
- Introducing new policy recognising the Karrawirra Pari / Riverbank precinct as a place of gathering and significance for traditional indigenous custodians.
- Deleting serviced apartments as an envisaged land use in the City Riverbank Zone.

Much of the changes seek to be more closely aligned with the State Planning Policies, *Environment Protection and Biodiversity Conservation Act 1999*, Adelaide Park Lands Management Strategy, National Heritage listing, and the vision from the 30-Year Plan for Greater Adelaide (2017 Update).

Changes specifically seek to find the right balance and provide a policy framework that supports the 30-Year Plan for Greater Adelaide's vision for the park lands "as a major recreational, sporting, tourism, natural and open space asset destination for the city and metropolitan Adelaide that connects the city to the suburbs".

The retention of land within the Adelaide Park Lands Zone (no subzones) at Kate Cocks Park, the western end of Helen Mayo Park, and the northern end of the Innovation Subzone shows a commitment to respond to matters raised during consultation.

Other changes, such as the inclusion of a new concept plan and removal of serviced apartments from the list of envisaged land uses, seek to provide more clarity and certainty as to what is expected in terms of land uses, heights and pedestrian connections. This will assist in the interpretation of the policy that seeks a transition in height down from North Terrace. While a number of matters raised in submissions in relation to high rise buildings near park lands and high density residential were never envisaged, these changes will put this beyond doubt.

These commitments to change in response to submissions builds on the government's strong track record in the protection and enhancement of the park lands. Significant State Government funding has been provided to the following projects:

- Adelaide Park Lands trail
- Marshmallow Park Redevelopment (Park 19)
- West Park Lands Redevelopment – Park 25 New Urban Park
- Park 25/Gladys Elphick / Narnungga – City Skate Park
- Whitmore Square/Iparraty Master Plan
- Park 22 – Metropolitan Netball Hub
- Park 24 – Ellis Park Community Recreation Facilities
- Quentin Kenihan Inclusive Playspace – Park 14 Murlawirrapurka
- Events Infrastructure Rundle and Rymill Parks.

State Government funding has also been provided to purchase land for new areas of public open space. This funding was used to return some 5.5 hectares of land at Thebarton (former SA Water Depot) to park lands in 2011 (see images right).

This area (now known as Narnungga Park 25) is located to the south-west of the Police Barracks and Old Adelaide Gaol along Port Road.

The current redevelopment of the Lot Fourteen Precinct (funded largely by the State Government) also seeks to return up to 50% of the site to publicly accessible open space with a significant amount of open space linking with the Adelaide Botanic Gardens.

In addition, in the transition from Development Plans to the Planning and Design Code, the five city squares (Victoria, Light, Whitmore, Hurtle and Hindmarsh) plus Wellington Square in North Adelaide transitioned to the Adelaide Park Lands Zone, whereas they were previously zoned to enable substantial development.

These measures are seeing our park lands enhanced for public benefit so they can continue to be valued and enjoyed by future generations.



Recommendations:

1. **Remove the Riverbank Subzone from the Adelaide Park Lands Zone; no change to the area around the Torrens Riverbank between the Torrens Weir and Kintore Avenue.**
2. **Retain the olive grove in Kate Cocks Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Health Subzone.**
3. **Retain land to the west of the Old Adelaide Gaol within the Adelaide Park Lands Zone; reduce the extent of the proposed expanded Health Subzone.**

- 4. Retain portion of Helen Mayo Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Entertainment Subzone.**

6.2 Concern about environmental impacts on the park lands

The environmental value of the park lands was cited within many submissions, with a concern that the Code Amendment will lead to development that will impact these values negatively. The loss of trees and the value of the park lands for flora and fauna was regularly cited. Some noted the State Government's recognition of Adelaide as a 'national park city' and that allowing further development on park lands is inconsistent with this aim. Several respondents went on to state their concern that development on areas of environmental value (such as the park lands) contributes to or exacerbates climate change impacts. The warming of the city through urban heat loading as a result of increased hard spaces, and less green/open space was also stated. Concerns about increased flooding or impacts on a flood plain were also raised as a concern.

Response:

Further to the above discussion and recommendations, in response to feedback concerned with loss of park lands, some areas of park lands which currently feature green space and vegetation are proposed to be maintained in the Adelaide Park Lands Zone. This change will assist in preserving vegetation and green space, contributing to the mitigation of climate change impacts and urban cooling.

Future development will also be assessed against landscaping policies in the Design in Urban Areas General Development Policies in the Planning and Design Code which seeks soft landscaping and tree planting incorporated in new development to minimise heat absorption and reflection, maximise shade and shelter, maximise stormwater infiltration, and enhance the appearance of land and streetscapes.

Stormwater management will also need to be considered in any future development application. Policies in the Design in Urban Areas General Development Policies in the Planning and Design Code seek for development to include stormwater management systems to ensure that development does not increase peak flows in downstream systems.

Recommendations:

Relevant recommendations from previous theme:

- 1. Remove the Riverbank Subzone from the Adelaide Park Lands Zone; no change to the area around the Torrens Riverbank between the Torrens Weir and Kintore Avenue.*
- 2. Retain the olive grove in Kate Cocks Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Health Subzone.*
- 3. Retain land to the west of the Old Adelaide Gaol within the Adelaide Park Lands Zone; reduce the extent of the proposed expanded Health Subzone.*
- 4. Retain portion of Helen Mayo Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Entertainment Subzone.*

6.3 Concern about impacts on sites of European heritage value

The historical value of the park lands was cited by many respondents as critical to the value, character, heritage and future of the City of Adelaide. Colonel Light's plan for Adelaide was cited by many as being a critical part of our city's heritage and something that should be protected and maintained. Many noted the

national heritage listing of the Adelaide Park Lands, and that allowing further development on them risks or compromises this listing, or future world heritage listing.

Some respondents also highlighted a concern that the Code Amendment runs contrary to certain legislation, with the *Adelaide Park Lands Act 2005* and the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) both cited.

Response:

The current Code Amendment is a proposal to change the policies, rules or mapping within the Planning and Design Code, which in turn can change the way in which future developments are assessed in the area affected.

It should be noted that the Adelaide Park Lands also has a range of other protections, and a range of other legislation and processes that are relevant when building or developing in the park lands. Some of these pieces of legislation / processes have been noted in many submissions as outlined above.

In this context, the Code Amendment does not:

- alter the status of land designated as Park Lands under the *Adelaide Park Lands Act 2005*.
- affect the National Heritage listing as the listing is protected under the EPBC Act.
- comprise a controlled 'action' under the EPBC Act and therefore does not require a referral under the EPBC (although any consequential development proposals may require referral).
- alter land tenure, custodianship or management arrangement including any Community Land Management Plans relating to the park lands.

In relation to the *Adelaide Park Lands Act 2005* specifically, many submissions have asserted that the Code Amendment is at odds with the statutory principles of the Act and associated management plan which both seek to return developed land to park lands.

There are no obligations under the current Code Amendment process which directly impact the *Adelaide Park Lands Act 2005*. The primary reason behind this, is that while the Code Amendment proposes to alter the zoning of some land in the park lands, it does not constitute a proposal to remove land from the park lands under the *Adelaide Park Lands Act 2005*.

The land will still be retained in the park lands under the *Adelaide Park Lands Act 2005*, consistent with other land zoned City Riverbank such as the former Royal Adelaide Hospital. However, it is acknowledged that any areas that are rezoned by this Code Amendment may require a subsequent amendment to the relevant management plan(s) for land that council and/or state agencies are responsible for managing within the area affected.

In addition, there is a separate process outlined under section 23 of the *Adelaide Park Lands Act 2005* that will need to be followed in relation to any proposal to change land use in areas of the park lands affected by this Code Amendment. If the entity who has the care, control or management of land changes, then a process for change of ownership, and /or change of land use, may need to be followed under the *Adelaide Park Lands Act 2005*. This process is separate to the Code Amendment process under the *Planning, Development and Infrastructure Act 2016*.

In relation to the EPBC Act, the Code Amendment was referred to the Commonwealth Department responsible for administering this Act even though there was no requirement to do so. A meeting was also held with the Commonwealth Department during the consultation period to discuss the Code Amendment.

The Commonwealth Department confirmed during this meeting that rezoning through the Code Amendment does not trigger the need for assessment under the EPBC Act, but that any development consequential to the Code Amendment process may require a potential referral. Therefore a decision to refer any future development will need to be considered at the time of a development application.

It's noted the heritage values of existing State-heritage listed items will be preserved as no changes are proposed to the State Heritage Place Overlay. Specific policy is also proposed in this Code Amendment which seeks for the adaptive reuse of the Old Adelaide Gaol and Thebarton Police Barracks in a manner that complements the historic values and park lands setting of the locality.

6.4 Concern about impact on sites of Kurna cultural value or importance

Many respondents acknowledged that many areas of park lands that are subject to the proposed Code Amendment are areas that are of cultural value or importance to First Nations people. Some cited specific burial or special sites that may be at risk of further degradation should this Code Amendment proceed. One of these is Pinky Flat / Tarntanya Wama which is recognised as having been a meeting place for First Nations people for thousands of years.

Several raised concerns about whether consultation with Kurna representatives on this Code Amendment has been sufficient.

Response:

Firstly, it is acknowledged that the area subject to policy change through this Code Amendment - Karrowirra Pari, meaning 'river of the red gum forests' (and official Kurna name for the River Torrens) was the heartland of the Kurna people, who lived along its length and tributaries.

In particular, it is also noted that Tarntanya Wama (Pinky Flat) is an area of particular importance to the Kurna people.

It is in this context that the Code Amendment has been prepared taking into account the areas cultural significance to the local Kurna people.

As an example, locations such as Pinky Flat / Tarntanya Wama are subject to the following policies within the Adelaide Park Lands Zone that protect areas and items of indigenous significance or special landscape character and therefore would be considered in any assessment, should development be proposed:

*PO 2.1 – A contextual design response that complements the open space function, natural and **cultural character of the area** and is suitably screened by landscaping.*

PO 3.1 – Development that protects, enhances and improves public access to:

- (a) areas of special landscape character (such as formal gardens, significant stands of trees, and the like), and*
- (b) areas and **items of indigenous** and post-colonial **cultural significance**.*

In addition, legislated controls also exist within the *Aboriginal Heritage Act 1988* to provide special protection of Aboriginal sites, objects or remains whether previously recorded or not.

In response to dialogue with the Kurna representatives, it is proposed to remove the Riverbank Subzone. The result of this will be retention of Pinky Flat in the Adelaide Park Lands Zone, with no subzone. It is also proposed to pull back the Innovation Subzone at the northern edge to preserve a site of cultural significance. A new policy is also proposed to ensure development recognises the Karrowirra Pari / Riverbank precinct as a place of gathering and significance for traditional indigenous custodians.

In terms of consultation with First Nations People, the engagement plan for the Code Amendment identified the Traditional Owners as being stakeholders of high interest to the Code Amendment. It is on this basis that the following level of engagement was undertaken during the consultation process:

- a letter sent to the Kurna Yerta Aboriginal Corporation Board (KYACB) five days before the commencement of consultation informing them of the Code Amendment and offering a meeting to discuss the changes proposed to policy in the Riverbank Precinct.
- a briefing of the Reconciliation Committee of the City of Adelaide (this Committee includes Traditional Owner representatives) during the consultation period.
- a meeting with staff of Aboriginal Affairs and Reconciliation, Department of Premier and Cabinet during the consultation period.

Several meetings were also held with representatives of the KYABC and the full board during and after the consultation period.

Recommendations:

Relevant recommendations from previous theme:

- 1. Remove the Riverbank Subzone from the Adelaide Park Lands Zone; no change to the area around the Torrens Riverbank between the Torrens Weir and Kintore Avenue.*
- 2. Retain the olive grove in Kate Cocks Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Health Subzone.*
- 3. Retain land to the west of the Old Adelaide Gaol within the Adelaide Park Lands Zone; reduce the extent of the proposed expanded Health Subzone.*
- 4. Retain portion of Helen Mayo Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Entertainment Subzone.*
- 5. Reduce the northern extent of the Innovation Subzone to align with the current built form of Adelaide Botanic High School.**
- 6. Insert new policy in the City Riverbank Zone to ensure new development recognises the Karrawirra Pari / Riverbank precinct as a place of gathering and significance for traditional indigenous custodians.**

6.5 Concern about particular sites being considered in the Code Amendment/or subject to future development (including Kate Cocks Park, the olive grove, Pinky Flat / Tarntanya Wama, Adelaide Botanic High School)

Many respondents were concerned about particular sites being considered in the Code Amendment due to their observed unsuitability or inappropriateness for future development.

The Kate Cocks Park site was desired by many to be left as it currently is and not a site of future development, and hence not to be rezoned. It was cited that the olive grove has recognised historical importance that should also be retained.

Pinky Flat / Tarntanya Wama was identified by several respondents as a valued area of green open space that is already well used by low impact temporary events. This site was also identified to be of value to First Nations people. The environmental impacts on the water as a result of development in this area was a concern.

Finally, rezoning near the Adelaide Botanic High School site was observed as being unnecessary. The green space to the south of the school was valued by many as a green space link to the Botanic Gardens.

Response:

As discussed in [section 6.1](#), it is proposed to change the Code Amendment to minimise change to zoning in Kate Cocks Park by removing the olive grove from the amendment.

The cultural value of Pinky Flat / Tarntanya Wama is acknowledged, and its role as a natural backdrop when viewed from the southern banks of the River Torrens / Karrawirra Pari. For this reason, the new Riverbank Subzone which was proposed to apply to this area is proposed to be removed from the Code Amendment, which means there will be no change to planning policy over Pinky Flat / Tarntanya Wama.

Extension of the City Riverbank's Innovation Subzone to the north is proposed to integrate Adelaide Botanic High School within the Lot Fourteen Innovation Precinct. The High School is already established and the open space link to the south of the School is proposed to be protected through the Code Amendment. The Code Amendment provides up-to-date zoning to reflect the land uses and built form which currently exists in this location. Accordingly, the proposed rezoning is considered appropriate.

Recommendations:

Relevant recommendations from previous theme:

- 1. Remove the Riverbank Subzone from the Adelaide Park Lands Zone; no change to the area around the Torrens Riverbank between the Torrens Weir and Kintore Avenue.*
- 2. Retain the olive grove in Kate Cocks Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Health Subzone.*
- 3. Retain land to the west of the Old Adelaide Gaol within the Adelaide Park Lands Zone; reduce the extent of the proposed expanded Health Subzone.*
- 4. Retain portion of Helen Mayo Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Entertainment Subzone.*

6.6 Concern about development of new arena

Some respondents were opposed a new arena entirely or suggested that it was unnecessary. Many others suggested that it shouldn't be developed in its proposed location at Helen Mayo Park.

Response:

It's important to understand that this Code Amendment does not propose a specific development, but rather deals with planning policy and zoning, and whether a change to such matters is appropriate in the context of the *Planning, Development and Infrastructure Act 2016*.

In relation to the proposed rezoning of Helen Mayo Park, it is noted that a large portion of the proposed rezoned area is currently an at-grade car park and not provided as green space for public recreational activities (see figure 1 below).

In order to ensure that more of the vegetation in the north-west of the area is maintained for green space and passive recreation, the extent of the rezoning is proposed to be reduced, maintaining more of the area within the Adelaide Park Lands Zone. In addition, a new concept plan in this area will seek to keep the river frontage publicly accessible to maintain pedestrian and cycle connections along the river.

Information on the Adelaide Riverbank Arena proposal is available on the Adelaide Venue Management website at www.avmc.com.au/arena.



Figure 1. Helen Mayo Park (SAPPA 2021)

Recommendations:

Relevant recommendations from previous theme:

- 4. Retain portion of Helen Mayo Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Entertainment Subzone.*

6.7 Concern about development of new Women's and Children's Hospital and/or associated car park

Many respondents thought that the current Women's and Children's Hospital in North Adelaide was sufficient, or should be upgraded in its current location. Other respondents suggested that the proposed site adjacent the Royal Adelaide Hospital is not large enough to accommodate the nWCH. Many were concerned about the building height that would be required to accommodate the nWCH on what is considered to be a small area – and the visual impacts of such a tall building in this part of the city.

Several called out the car park associated with the nWCH as a concern, with comments opposed to the location, height, or design of the car park.

This theme is read in conjunction with supportive comments noted in themes 6.12 and 6.13.

Response:

The nWCH delivers on a commitment to provide best practice health services for women and children by building a new hospital, co-located with the Royal Adelaide Hospital (RAH). The co-location of these

principal hospital facilities in a single medical precinct presents a unique opportunity to leverage the dedicated specialist services provided by both.

It's noted that the zoning in the location of the principal nWCH building is not proposed to be altered through this Code Amendment, as the area is already zoned City Riverbank Zone and Health Subzone. However, an expansion of this subzone to the west, west of the railway line and Gaol Road, is proposed to provide for development of complementary facilities to support the hospital and bio-medical precinct.

It's also pertinent to acknowledge that this Code Amendment does not propose a specific development, but rather deals with planning policy and zoning, and whether such a change is appropriate in the context of the *Planning, Development and Infrastructure Act 2016*.

Further information on the master planning and development of the nWCH design is available on the WCH website www.wch.sa.gov.au/nWCH.

As mentioned above, the area of an historic olive grove in Kate Cocks Park is proposed to be removed from this Code Amendment, remaining within the Adelaide Park Lands Zone.

Concerns raised regarding permissible building height in the area west of the railway warrants further scrutiny of the building height policy in the City Riverbank Zone and Health Subzone. The policy released for public consultation sought the following:

City Riverbank Zone: PO 2.1

Building heights provide an orderly transition in scale, with lower buildings located towards the Adelaide Park Lands, Adelaide Botanic Garden and River Torrens / Karrawirra Pari and taller buildings towards North Terrace.

Health Subzone: PO 2.1

Buildings have a positive scale relationship to the North Terrace edge of the Capital City Zone and provide a grand entrance to the city from the west.

Health Subzone: DTS/DPF 2.1

Buildings fronting North Terrace not exceeding 15 building levels and 53m in building height.

Health Subzone: PO 2.6

Building heights on the north-western side of the railway transition down in scale, with lower buildings located towards the Adelaide Park Lands and in a manner that complements the existing heritage features of the adjoining Police Barracks and Old Adelaide Gaol.

Several respondents and media articles throughout the consultation period observed that a building height of 15 storeys would be permitted in this area.

The above policies anticipate a maximum 15 building levels only for buildings which front North Terrace, at the edge of the Capital City Zone, whereas the area in question does not have a frontage to North Terrace and is not in proximity of the Capital City Zone. The policy envisages a transition down in scale, with lower buildings located near the Adelaide Park Lands, and in a manner which complements the scale of the police barracks and gaol.

While review of the policy demonstrates that 15 storeys is not envisaged in this location, to avoid any doubt, additional policy and a concept plan are proposed to be included in this Code Amendment to clarify that a maximum of six building levels (i.e. medium rise development) is envisaged near the railway line, transitioning down to a maximum of two levels (i.e. low rise development) at the interface of the Adelaide Park Lands Zone.

The unique benefits of this location in a park lands setting are acknowledged. In order to ensure future development harnesses and embraces the benefits of the unique natural setting, a new concept plan is recommended to be inserted into the Code which seeks connections between and through the park lands, North Terrace, RAH and nWCH. This will provide visitors and patients of the hospital with the means to access the park lands by promoting pedestrian movement through the area, further activating the western park lands.

Recommendations:

Relevant recommendations from previous theme:

2. Retain the olive grove in Kate Cocks Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Health Subzone.

3. Retain land to the west of the Old Adelaide Gaol within the Adelaide Park Lands Zone; reduce the extent of the proposed expanded Health Subzone.

7. **Insert new 'Concept Plan 125 – City Riverbank Zone - West' into Part 12 of the Code which sets out maximum building heights in the Health Subzone west of the railway line, and pedestrian and cyclist connections which should be maintained and established throughout the health and entertainment precincts – Refer to Concept Plan in [Attachment 5](#)**

6.8 Concern about the process or scope of the Code Amendment

Many respondents expressed their concern or disappointment with the Code Amendment process, scope or consultation. Information was described by many as either insufficient, or too technical and requiring a high level of assumed or professional knowledge. Others thought that the Code Amendment should be based on a master plan which had been endorsed and consulted on.

Many suggested that the engagement process was not genuine and expressed that the Code Amendment was a *fait accompli*, its outcome already determined. Others suggested that the engagement time period was inadequate or not widely promoted. Many suggested that the engagement process was not compliant with the Community Engagement Charter, citing that it did not meet principles such as genuine, or fit for purpose.

Some were concerned that this Code Amendment was being 'rushed through' and that they would not have the opportunity to provide feedback on the key elements of future development proposed (namely the nWCH and Arena).

Response:

The Community Engagement Charter (the Charter) sets out the following five key principles:

1. Engagement is genuine
2. Engagement is inclusive and respectful
3. Engagement is fit for purpose
4. Engagement is informed and transparent
5. Engagement processes are reviewed and improved.

The Charter emphasises that engagement should be focused at the policy setting stage – it “*seeks to strengthen engagement up front in the development of planning policies, strategies and schemes, as it does not have a statutory role in the assessment of development applications*”.

Mandatory requirements relevant to this Code Amendment include the following:

Consultation Category	Mandatory requirement	Notification provided
Proposals that are specifically relevant to a particular Council (where Council did not initiate the proposal)	That Council must be directly notified of the proposal and consulted.	City of Adelaide was directly consulted on the Code Amendment by way of letter emailed on 10 September 2021 (five days prior to consultation commencing). City of Adelaide was also briefed on the Code Amendment at a special meeting held on 21 September 2021 (APLA also briefed on 26 August and Reconciliation Committee of Council briefed on 21 October).
Proposals that are generally relevant to Councils.	The Local Government Association must be notified in writing and consulted.	The Local Government Association was consulted directly on the Code Amendment by way of letter emailed on 10 September 2021 (five days prior to consultation commencing).

The detailed Engagement Plan released as part of consultation on the Code Amendment has addressed all of the following points:

- Meets the principles and performance outcomes of the Charter.
- Describes the persons or bodies to be consulted on the proposed amendment.
- Outlines any relevant previous engagement undertaken to inform the proposal.
- Describes the evaluation framework for the engagement.

However, it is acknowledged that detailed submissions such as those provided by the City of Adelaide and other organisations / individuals have asserted that there were two critical shortcomings of the process undertaken by the Code Amendment in relation to engagement:

- The engagement timeframe of six weeks was inadequate to provide a detailed informed submission, in particular considering:
 - The state-wide importance of the Adelaide Park Lands.
 - The need to offer targeted, genuine and culturally appropriate consultation with the Traditional Owners prior to any decisions on the Code Amendment being finalised.
- Insufficient documentation and analysis provided in the Code Amendment, including:
 - Assessment [classification] tables.
 - Insufficient regard to the State Planning Policies (SPP's) in the drafting of the Code Amendment – particularly SPP 4 – Biodiversity, SPP 2 – Design Quality, and other key SPP's including, but not limited to, Cultural Heritage and Climate Change.

With regard to the six week timeframe for commenting on the Code Amendment, this was considered to be adequate to comment on the full scope of the Code Amendment given the targeted nature of consultation undertaken (letters, briefings and information sessions) and communications released (all outlined in the engagement plan).

The issue of targeted consultation with Traditional Owners on the Code Amendment has been addressed above.

In terms of concerns raised about there being insufficient documentation and analysis provided with the Code Amendment, it is considered that the material provided to the general public and interested

stakeholders was clear and concise in explaining the changes proposed and was provided in a way that is consistent with the Community Engagement Charter.

Provision of assessment/classification tables, which are used for coding policies in the online Code, may have detracted from the community's understanding of the changes due to the highly technical nature of these tables. Instead, a copy of the intended changes to these classification tables was provided directly to the City of Adelaide staff upon request during the consultation period.

It's noted the Code Amendment did not propose any changes to assessment pathways for development in the affected area, so changes to classification tables were limited to consequential changes to policy numbering as per the consulted Code Amendment.

In order to make clear the anticipated changes to the classification tables and how policies are called up through the online Code, any changes to these tables have been listed in the Code Amendment instructions in [section 8](#) and illustrated in [Attachment 7 and 8](#) of this report.

Note: No changes are proposed to the classification tables in the Adelaide Park Lands Zone.

In terms of the concerns expressed about the information provided to accompany the Code Amendment on the Plan SA website, it should be noted that this information was drafted with many target audiences in mind. This ranged from the more technical and detailed Code Amendment document (including the relevant investigations / analysis and policy response) to the less detailed Code Amendment brochure, frequently asked questions document and spatial mapping documents (before and after zone / subzone maps) which were aimed at helping the general community to understand the proposed changes.

In addition, the information sessions held over two days in mid-October 2021 provided an opportunity for members of the public to talk directly to government staff about the proposed changes.

6.9 Concern about impacts on infrastructure / public access

Several respondents provided consistent responses with a concern that the Code Amendment would make way for development that would impact on public access of the park lands. Some suggested that it would lead to privatisation or commercialisation of park lands, restricting public access altogether. Other respondents focused on pedestrian and cycle access along the river needing to be retained. Some suggested that current infrastructure – particularly public transport, and infrastructure for other active transport forms is limited and should be expanded.

Response:

The Code Amendment seeks to maintain and improve public access to park lands and ensure pedestrian and cyclist connections are enhanced throughout the precinct. In order to strengthen this aim, a concept plan is proposed to be introduced to set out the desired connections throughout the entertainment and health precincts.

Recommendations:

Relevant recommendation from previous theme:

7. Insert new 'Concept Plan 125 – City Riverbank Zone - West' into Part 12 of the Code which sets out maximum building heights in the Health Subzone west of the railway line, and pedestrian and cyclist connections which should be maintained and established throughout the health and entertainment precincts. (Themes 6.3, 6.10)

6.10 Neutral comments / suggested alternatives

A number of respondents made comments that didn't clearly indicate support or opposition, but rather provided commentary of a neutral nature. Some respondents suggested additions or alternatives that could be considered. These included an increase in the provision of cycling facilities and infrastructure throughout the precinct. Another suggested that policies should actively encourage building over railway lines – to avoid them being an otherwise unused area that dissects the river from North Terrace. One respondent suggested that an alternative site for the nWCH could be to use empty (existing) office buildings in the CBD instead.

Response:

The role of the Code Amendment is to consider suitability of zoning and policies, in the context of the State Planning Policies and relevant regional plan. Suggestions for alternative sites for specific projects is not within the scope of considerations for this amendment to the planning rules.

6.11 Support/positive comments

Several respondents provided generally positive statements comments of support for the Code Amendment. These comments were generally non-specific with regards to the reasons for support.

6.12 Support/positive comments about developing an underutilised site

There were many supportive and positive comments received relating to the Code Amendment that would allow the development of what was considered by many to be an underutilised part of the park lands. Some cited that it would create a range of spin off opportunities for other businesses and events by bringing activity to these new sites. Some suggested that this contributes to Adelaide being an international city, with world class facilities and that it would also create jobs and economic growth. Some thought the arena would create a new destination, a new heart for the city and a range of tourism opportunities.

Response:

These positive comments are acknowledged in context with others raising differing points of view. The range of abovementioned recommendations seek to address concerns with loss of park lands, while providing for suitable development potential on currently underutilised sites. Activating underutilised land to service the community may help to add value to the park lands to ensure they are enjoyed by more of the South Australian community.

6.13 Support/positive comments related to the nWCH and arena

Many respondents suggested that the current WCH is dated and in need of replacement. The co-location with the RAH was suggested by several respondents to be logical and presenting a range of benefits. Some raised questions about the use of the current WCH once the new one is built, with some suggesting a land swap with replacement park lands would be a good outcome for the community.

With relation to the proposed arena, several respondents used the Code Amendment consultation as an opportunity to indicated their strong support for the arena. Several suggested that this would bring activity and vibrancy to this north-western side of the city, which was seen as valuable. Others noted the opportunities for local and international tourism and the associated economic benefits to the city.

Response:

These comments in support of the Code Amendment as it relates to the nWCH and arena are noted on balance with other comments raising concern with loss of park lands.

The abovementioned recommendations seek to strike a balance between differing points to view, to provide for development of the nWCH and future entertainment land uses in a manner which preserves and enhances the surrounding park lands.

6.14 Other matters

In response to other comments received, as summarised in [section 5](#) of this report, the following changes are proposed:

Residential development in the Riverbank Precinct

Some concern was raised regarding the prospect of allowing residential apartments within the precinct.

Residential development is not considered to be an appropriate land use within the Riverbank Precinct. Accordingly, it is recommended that 'serviced apartments' is removed from the City Riverbank Zone's list of envisaged development, and policy which speaks to the siting and design of residential development in the Entertainment Subzone is deleted.

Recommendation:

8. Delete "serviced apartments" from DTS/DPF 1.1 of the City Riverbank Zone.
9. Expand PO 1.1 of the City Riverbank Zone to make clear that the Riverbank Precinct envisages community, commercial and employment generating land uses (not residential).
10. Delete PO 1.2 from the City Riverbank Zone's Entertainment Subzone.

Active ground level land uses in the Entertainment Subzone

It is important for policy in the Code to encourage active ground level uses fronting the riverbank. Feedback seeking policy to facilitate activation that delivers desirable visitor experiences is supported.

Recommendation:

11. Insert additional policy in the Entertainment Subzone requiring the activation of the ground level of buildings – in particular any development that has a frontage to the River Torrens / Karrawirra Pari.

Helen Mayo North and South buildings

A submission from the University of Adelaide, as land owners of the Helen Mayo North and South buildings located south of Adelaide Botanic High School, requested that these buildings also be incorporated within the Innovation Subzone.

These buildings are currently used by the university to provide facilities related to microscopy, innovative imaging techniques, and medical sciences. These land uses are considered to be compatible with the land uses sought in the Innovation Subzone, including educational and research activities. This change would also avoid a disjointed subzone layout within this precinct.

Recommendations:

- 12. Change the subzone over the Helen Mayo North Building and Helen Mayo South Building from Cultural Institutions to Innovation Subzone.**
- 13. Amend Concept Plan 85 – City Riverbank Zone to include the Helen Mayo North and South building and rename to ‘Concept Plan 85 – City Riverbank Zone – Innovation’.**

7 Summary of recommended changes

As a result of the engagement, the following changes are proposed to the Code Amendment (when compared with the proposal that was engaged on):

Proposed change	Reason
<p>1. Remove the Riverbank Subzone from the Adelaide Park Lands Zone; no change to the area around the Torrens Riverbank between the Torrens Weir and Kintore Avenue.</p>	<p>To respond to concerns regarding opportunity for commercial development on the River Torrens / Karrawirra Pari waterfront and potential impact to culturally significant sites. This change will retain policy in the Adelaide Park Lands Zone in its current form in the area surrounding the River Torrens / Karrawirra Pari waterfront, including Pinky Flat / Tarntanya Wama.</p> <p>(See Engagement Themes 6.1, 6.2, 6.4, 6.5)</p>
<p>2. Retain the olive grove in Kate Cocks Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Health Subzone.</p>	<p>To respond to concerns regarding impact on the historic olive grove in Kate Cocks Park, and submissions seeking to preserve the Adelaide Park Lands for open space.</p> <p>(See Engagement Themes 6.1, 6.2, 6.4, 6.5, 6.7)</p>
<p>3. Retain land to the west of the Old Adelaide Gaol within the Adelaide Park Lands Zone; reduce the extent of the proposed expanded Health Subzone.</p>	<p>To respond to submissions seeking to preserve the Adelaide Park Lands for open space.</p> <p>(See Engagement Themes 6.1, 6.2, 6.4, 6.5, 6.7)</p>
<p>4. Retain portion of Helen Mayo Park within the Adelaide Park Lands Zone; reduce the extent of proposed expanded Entertainment Subzone.</p>	<p>To respond to submissions seeking to preserve the Adelaide Park Lands for open space.</p> <p>(See Engagement Themes 6.1, 6.2, 6.4, 6.5, 6.6)</p>
<p>5. Reduce the northern extent of the Innovation Subzone to align with the current built form of Adelaide Botanic High School.</p>	<p>To ensure the Code Amendment recognises the cultural heritage values of the lands to the north of the proposed expanded Innovation Subzone.</p> <p>(See Engagement Theme 6.4)</p>
<p>6. Insert new policy in the City Riverbank Zone to ensure new development recognises the Karrawirra Pari / Riverbank precinct as a place of gathering and significance for traditional indigenous custodians.</p>	<p>To emphasise the cultural importance of this location and ensure development is sympathetic to these values.</p> <p>(See Engagement Theme 6.4)</p>
<p>7. Insert new 'Concept Plan 125 – City Riverbank Zone - West' into Part 12 of the Code which sets out maximum building heights in the Health Subzone west of the railway line, and pedestrian and cyclist connections which should be maintained and established throughout the health and entertainment precincts – Refer to Concept Plan in Attachment 5</p>	<p>To respond to concerns about potential building height in the new Health Subzone by clarifying the maximum heights of 2-6 storeys, and to address submissions emphasising the importance of pedestrian connectivity through the nWHC and RAH to the Park Lands.</p> <p>(See Engagement Themes 6.7, 6.9)</p>

<p>8. Delete “serviced apartments” from DTS/DPF 1.1 of the City Riverbank Zone.</p> <p>9. Expand PO 1.1 of the City Riverbank Zone to make clear that the Riverbank Precinct envisages community, commercial and employment generating land uses (not residential).</p> <p>10. Delete PO 1.2 from the City Riverbank Zone’s Entertainment Subzone.</p>	<p>To clarify that residential development is not envisaged in the Riverbank precinct.</p>
<p>11. Insert additional policy in the Entertainment Subzone requiring the activation of the ground level of buildings – in particular any development that has a frontage to the River Torrens / Karrawirra Pari.</p>	<p>To encourage active ground level uses fronting the riverbank, improving safety and encouraging public use of the riverbank.</p>
<p>12. Change the subzone over the Helen Mayo North Building and Helen Mayo South Building from Cultural Institutions to Innovation Subzone.</p> <p>13. Amend Concept Plan 85 – City Riverbank Zone to include the Helen Mayo North and South building and rename to ‘Concept Plan 85 – City Riverbank Zone – Innovation’.</p>	<p>To better integrate these buildings with the surrounding Innovation precinct, consistent with the current use of these buildings by the University of Adelaide to provide facilities related to microscopy, innovative imaging techniques, and medical sciences.</p>

In addition, the following changes are proposed based on additional investigations and engagement with State Government agencies.

Proposed change	Reason
<p>14. Amend policy in regarding adaptive reuse of the Old Adelaide Gaol and Thebarton Police Barracks in the Health Subzone to anticipate tourism and community land uses within these buildings, not just health-related land uses.</p>	<p>It has been observed that, in order to provide suitable opportunities for the adaptive reuse of the Old Adelaide Gaol and Thebarton Police Barracks, it would be beneficial to provide for a wider range of land uses within these existing buildings.</p>

A conceptual illustration summarising the key changes proposed is included in figure 2 below.



Figure 2. Summary of key proposed changes in response to consultation feedback (conceptual for illustration purposes only)

8 Code Amendment instructions

The following amendment instructions (at the time of drafting) relate to the Planning and Design Code, version 2021.16 published on 4 November 2021. Where amendments to the Planning and Design Code have been published after this date, consequential changes to the following amendment instructions will be made as necessary to give effect to this Code Amendment.

Amendment Instructions

Amend the Code as follows:

1. *Spatially apply the City Riverbank Zone (in place of the Adelaide Park Lands Zone) to the affected area bounded by the blue line in **Attachment 2 - Map A: Amended Zones – Health**.*
2. *Spatially apply the Health Subzone to the affected area bounded by the blue line in **Attachment 2 - Map B: Amended Subzones – Health**.*
3. *Spatially apply the City Riverbank Zone (in place of the Adelaide Park Lands Zone) to the affected area bounded by the blue line in **Attachment 3 - Map C: Amended Zones – Entertainment**.*
4. *Spatially apply the Entertainment Subzone (in place of the Health Subzone (in part)) to the affected area bounded by the blue line in **Attachment 3 - Map D: Amended Subzones – Entertainment**.*
5. *Spatially apply the City Riverbank Zone (in place of the Adelaide Park Lands Zone) to the affected area bounded by the blue line in **Attachment 4 - Map E: Amended Zones – Innovation**.*
6. *Spatially apply the Innovation Subzone (in place of the Cultural Institutions Subzone (in part)) to the affected area bounded by the blue line in **Attachment 4 - Map F: Amended Subzones – Innovation**.*
7. *In Part 12 – Concept Plans, under the section relating to Adelaide City, insert immediately after ‘Concept Plan 85 – City Riverbank’, new ‘Concept Plan 125 – City Riverbank – West’ contained in **Attachment 5 - Map G: Proposed Concept Plan**. Spatially apply Concept Plan 125 – City Riverbank – West accordingly within the Concept Plan – Technical & Numeric Variations Layer of the SA Property and Planning Atlas.*
8. *In Part 12 – Concept Plans, under the section relating to Adelaide City, replace existing ‘Concept Plan 85 – City Riverbank’ with amended ‘Concept Plan 85 – City Riverbank – Innovation’ contained in **Attachment 6 - Map H: Amended Concept Plan**. Spatially apply Concept Plan 85 – City Riverbank – Innovation accordingly within the Concept Plan – Technical & Numeric Variations Layer of the SA Property and Planning Atlas.*
9. *In Part 2 – Zones and Subzones, amend the Adelaide Park Lands Zone in accordance with the tracked changes shown in **Attachment 7**.*
10. *In Part 2 – Zones and Subzones, amend the City Riverbank Zone and associated subzones in accordance with the tracked changes shown in **Attachment 8**.*

Attachments

Attachment 1 - Evaluation results

Results of the survey of the engagement

Evaluation statement	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
I feel the engagement genuinely sought my input to help shape the proposal	23%	27%	25%	23%	2%
I was given an adequate opportunity to be heard	18%	16%	33%	30%	3%
I was given sufficient information so that I could take an informed view	19%	17%	29%	33%	2%
I felt informed about why I was being asked for my view, and the way it would be considered.	20%	24%	29%	25%	2%

Results and evaluation of designated entity's engagement

The engagement was evaluated by AGD Strategic Communications Unit.

	Evaluation statement	Response options (<i>Select answer</i>)
1	Engagement occurred early enough for feedback to genuinely influence the planning policy, strategy or scheme (Principle 1)	<ul style="list-style-type: none"> Engaged when there was opportunity for input into first draft <p>Early engagement occurred through pre-consultation meetings with the City of Adelaide, as well as a pre-consultation briefing to the Adelaide Park Lands Authority.</p> <p>A six-week consultation period provided multiple ways for people to have their say, both online, through written submissions and email, and by speaking to staff at information sessions and through the PlanSA service desk.</p> <p>Changes to the Code Amendment have been recommended in response to the feedback provided.</p>
2	Engagement contributed to the substance of the Code Amendment (Principle 1)	<ul style="list-style-type: none"> In a significant way <p>The changes recommended to the Code Amendment in response to the engagement process are significant, and respond to the key themes raised by the community.</p>
3	The engagement reached those identified as the community of interest (Principle 2)	<ul style="list-style-type: none"> Representatives from most community groups participated in the engagement <p>Stakeholders identified in the engagement plan were actively engaged to seek their views on what was proposed.</p> <p>The information sessions were not well attended, with 36 people across eight available times.</p>

		However feedback provided through written submissions was significant, from across the community and identified stakeholders.
4	Engagement included the provision of feedback to community about outcomes of their participation	<ul style="list-style-type: none"> ▪ Formally (report or public forum) <p>Respondents will be provided with information about the outcomes of the engagement, and the engagement report will be published online.</p>
5	Engagement was reviewed throughout the process and improvements put in place, or recommended for future engagement (Principle 5)	<ul style="list-style-type: none"> ▪ Reviewed but no system for making recommendations <p>Where an opportunity to improve the reach of the engagement or community awareness was identified, action was prompt. Communications such as the frequently asked questions document were updated, and additional measures were taken to reach particular stakeholders. An advertisement in The Advertiser, and additional social media content was published to boost attendance at information sessions.</p>

Attachment 2 – Zone and Subzone Amendments - Health

Map A: Amended Zones - Health

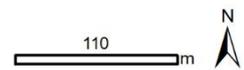


Amended Zones - Health



- Affected area
- Proposed City Riverbank Zone
- Parcel cadastre
- Rail

Date: 12/11/2021



Map B: Amended Subzones - Health

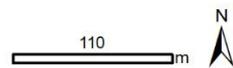


Amended Subzones - Health



- Affected area
- Proposed Health Subzone
- Parcel cadastre
- Rail

Date: 12/11/2021



Attachment 3 – Zone and Subzone Amendments - Entertainment

Map C: Amended Zones - Entertainment

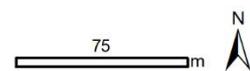


Amended Zones - Entertainment



- Affected area
- Proposed City Riverbank Zone
- Parcel cadastre
- Rail

Date: 12/11/2021



Map D: Amended Subzones – Entertainment



Amended Subzones - Entertainment



Date: 12/11/2021

- Affected area
- Proposed Entertainment Subzone
- Parcel cadastre
- Rail

Attachment 4 – Zone and Subzone Amendments - Innovation

Map E: Amended Zones - Innovation

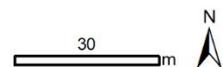


Amended Zones - Innovation

Date: 12/11/2021



- Affected area
- Proposed City Riverbank Zone
- Parcel cadastre



Map F: Amended Subzones – Innovation

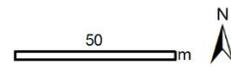


Date: 12/11/2021

Amended Subzones - Innovation

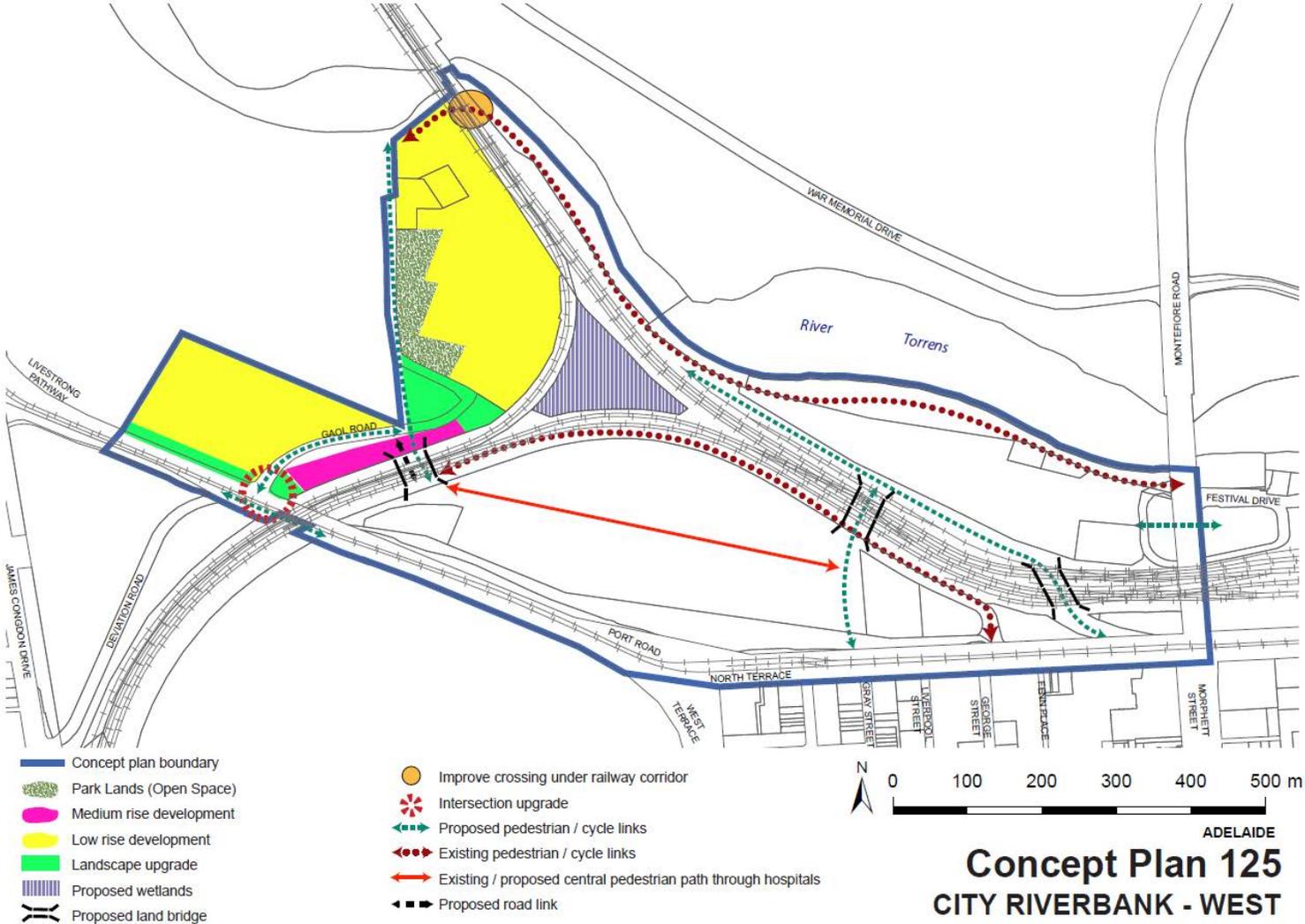


- Affected area
- Proposed Innovation Subzone
- Parcel cadastre



Attachment 5 – New Concept Plan

Map G: Proposed Concept Plan



Attachment 6 – Amended Concept Plan

Map H: Amended Concept Plan



Attachment 7 – Tracked change version of Adelaide Park Lands Zone

Note:

Changes proposed by the Code Amendment are outlined as follows:

- Deletion shown by red text with strikethrough e.g. ~~remove text~~
- Addition shown by green text with underline e.g. add text.

Part 2 – Zones and Subzones

Adelaide Park Lands Zone

Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	A unique publicly accessible and well connected open space system, including the formal city squares, that creates a distinctive landscaped park setting for the City of Adelaide.
DO 2	A range of passive and active recreational activities with a high-level of amenity, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of temporary events, such as festivals, concerts and sporting events.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Use and Intensity	
PO 1.1 A diverse range of open space, recreation and sporting activities.	DTS/DPF 1.1 Development comprises one or more of the following: (a) Advertisement (b) Conservation work

	<ul style="list-style-type: none"> (c) Outbuilding associated with open space maintenance (d) Recreation area (e) Shop (f) Special events (g) Sporting field or club facility (h) Structures associated with a public facility such as bike and vehicle parking, picnic / barbeque area, shelter and toilet.
<p>PO 1.2</p> <p>Shops in appropriate areas of the Adelaide Park Lands:</p> <ul style="list-style-type: none"> (a) provide a range of goods and services for the users of activities in the Adelaide Park Lands and where such goods and services are not otherwise conveniently located and (b) positively contribute to Adelaide Park Lands activation and setting without being visually prominent. 	<p>DTS/DPF 1.2</p> <p>Shops:</p> <ul style="list-style-type: none"> (a) are ancillary to a recreational use, club, sporting facility (b) do not exceed 50m² in gross leasable floor space and (c) do not increase the building footprint.
<p>PO 1.3</p> <p>Community, cultural, tourism, shop or licensed premises located adjacent to the southern bank of the River Torrens between Montefiore Road and King William Road.</p>	<p>DTS/DPF 1.3</p> <p>None are applicable.</p>
<p>PO 1.4</p> <p>Community, cultural and tourism uses in association with the Torrens Training Depot and Parade Ground.</p>	<p>DTS/DPF 1.4</p> <p>None are applicable.</p>
<p>PO 1.5</p> <p>Special events in suitable locations and recreation uses of a temporary or transient nature limiting their impacts</p>	<p>DTS/DPF 1.5</p> <p>None are applicable.</p>

<p>on the open and natural character of the Adelaide Park Lands.</p>	
<p>PO 1.6</p> <p>The adaptive reuse of existing buildings to improve the design quality and appearance of the building, minimise the need to increase the building footprint and positively contribute to the cultural value, amenity and activation of the Adelaide Park Lands.</p>	<p>DTS/DPF 1.6</p> <p>None are applicable.</p>
<p>PO 1.7</p> <p>New buildings seek to minimise the building footprint on the landscaped and open setting of the Adelaide Park Lands and should only be considered where:</p> <ul style="list-style-type: none"> (a) the development is the replacement of an existing building and does not increase the overall building footprint (b) the building design is contextual and of high-quality so that it complements its setting when viewed from all perspectives (c) provides complementary recreation, sporting or tourism facilities that could not otherwise have been provided in the zone and (d) the building is designed to be multi-purpose and can be used by more than one user group 	<p>DTS/DPF 1.7</p> <p>None are applicable.</p>
<p>PO 1.8</p> <p>The redevelopment of existing buildings and structures within the following sites in a way that is ancillary and complementary to existing uses including:</p> <ul style="list-style-type: none"> (a) Adelaide Oval 	<p>DTS/DPF 1.8</p> <p>None are applicable.</p>

<p>(b) Memorial Drive tennis precinct-formal sport related facilities</p> <p>(c) Torrens Lake - boating facilities</p> <p>(d) Police Barracks and Old Adelaide Gaol - adaptation of existing buildings and supportive public uses</p> <p>(e)<u>(d)</u> Adelaide and Botanic High Schools - education and related facilities</p> <p>(f)<u>(e)</u> National Wine Centre - tourism related facilities within the existing site boundaries</p> <p>(g)<u>(f)</u> Adelaide Botanic Garden - restaurants, function facilities and passive recreation facilities</p> <p>(h)<u>(g)</u> Adelaide Zoo - a range of <u>tourism and visitor related facilities ancillary activities</u> that add to the zoo as a key city attraction</p> <p>(i)<u>(h)</u> Golf Course - club facilities and restaurants</p> <p>(j)<u>(i)</u> West Terrace Cemetery - chapel, visitor and interpretative centre and operational facilities</p> <p>(k)<u>(j)</u> North Adelaide Train Station - rail services facilities</p> <p>(l)<u>(k)</u> Victoria Park Grandstand.</p>	
<p>PO 1.9</p> <p>Development at the Adelaide Aquatic Centre site consolidates and replaces existing buildings with recreational sporting clubrooms, facilities and associated administrative functions.</p>	<p>DTS/DPF 1.9</p> <p>None are applicable.</p>
<p>PO 1.10</p> <p>Development of public infrastructure is appropriate:</p> <p><u>(a)</u> -within existing roads, railway corridors or the O-Bahn corridor where it does not create any additional impact on the amenity of the Adelaide Park Lands</p>	<p>DTS/DPF 1.10</p> <p>None are applicable.</p>

<p><u>(b) where it facilitates safe, connected pedestrian and cycle movement</u> (a)<u>(c) where it facilitates the treatment and/or management of stormwater in a passive and natural landscaped setting.</u></p>	
<p>Built Form and Character</p>	
<p>PO 2.1 A contextual design response that complements the open space function, natural and cultural character of the area and is suitably screened by landscaping.</p>	<p>DTS/DPF 2.1 None are applicable.</p>
<p>PO 2.2 Development includes lighting that positively contributes to public safety, activity and amenity within the Adelaide Park Lands.</p>	<p>DTS/DPF 2.2 None are applicable.</p>
<p>PO 2.3 Utility and supply services, holding tanks, sub-stations, power lines and other utility facilities that are unobtrusive and where practicable, placed underground.</p>	<p>DTS/DPF 2.3 None are applicable.</p>
<p>PO 2.4 Development sited and designed to minimise negative impacts on adjacent residential uses.</p>	<p>DTS/DPF 2.4 None are applicable.</p>
<p>Natural / Cultural Landscape Character</p>	
<p>PO 3.1 Development that protects, enhances and improves public access to: (a) areas of special landscape character (such as formal gardens,</p>	<p>DTS/DPF 3.1 None are applicable.</p>

<p>significant stands of trees, and the like) and (b) areas and items of indigenous and post-colonial cultural significance.</p>	
<p>PO 3.2 Development recognises the Park Land's National Heritage Values.</p>	<p>DTS/DPF 3.2 None are applicable.</p>
<p>PO 3.3 Development maintains the visual distinction between the predominantly open landscape character of the Adelaide Park Lands and the built-form of adjacent Zones.</p>	<p>DTS/DPF 3.3 None are applicable.</p>
<p>PO 3.4 Development contributes to the return of alienated land to Adelaide Park Lands where practical.</p>	<p>DTS/DPF 3.4 None are applicable.</p>
<p>PO 3.5 Development sensitive to native biodiversity which incorporates ways to protect and improve biodiversity through its design and siting.</p>	<p>DTS/DPF 3.5 None are applicable.</p>
<p>PO 3.6 Development enhances natural creek channels and watercourses as a major landscape and stormwater management feature.</p>	<p>DTS/DPF 3.6 None are applicable.</p>
<p>Advertisements</p>	
<p>PO 4.1 Permanent advertisements or advertising hoardings only provide interpretive information or directions</p>	<p>DTS/DPF 4.1 None are applicable.</p>

relating to features and facilities within the Adelaide Park Lands-.	
<p>PO 4.2</p> <p>Temporary advertisements relating to a local event of a religious, educational, cultural, social or recreational character or to an event of a political character limited in size and number which do not detract from the open and natural character of the zone.</p>	<p>DTS/DPF 4.2</p> <p>Advertisements:</p> <p>(a) not exceeding 2m² on a building or site</p> <p>(b) not displayed more than 1 month prior to the event and 1 week after the event concludes except for an advertisement that relates to a federal, state or local government election</p> <p>and</p> <p>(c) do not:</p> <p>(i) move or flash</p> <p>(ii) reflect light so as to be an undue distraction to motorists</p> <p>(iii) use internal lighting or</p> <p>(iv) principally advertise brands or products.</p>
Movement, access and parking	
<p>PO 5.1</p> <p>Development does not restrict public access to land within the zone and ensures the Adelaide Park Lands are universally accessible.</p>	<p>DTS/DPF 5.1</p> <p>None are applicable.</p>
<p>PO 5.2</p> <p>Car parking in the Zone is limited to serving activities within the Adelaide Park Lands, and located close to existing road networks to minimise impact on the Adelaide Park Lands character.</p>	<p>DTS/DPF 5.2</p> <p>None are applicable.</p>
<p>PO 5.3</p>	<p>DTS/DPF 5.3</p>

<p>Additional car parking is avoided by utilising on street parking or shared parking areas, locating close to walking and cycling infrastructure, utilising the existing road network and other such means.</p>	<p>None are applicable.</p>		
<p>PO 5.4 Public vehicle access limited to existing roads.</p>	<p>DTS/DPF 5.4 None are applicable.</p>		
<p>Fencing</p>			
<p>PO 6.1 Fencing is open so that Adelaide Park Lands character is maintained, and maintains public access.</p>	<p>DTS/DPF 6.1 None are applicable.</p>		
<p>Concept Plans</p>			
<p>PO 7.1 Development is compatible with the outcomes sought by any relevant Concept Plan contained within Part 12 - Concept Plans of the Planning and Design Code to support the orderly development of land through staging of development and provision of infrastructure.</p>	<p>DTS/DPF 7.1 The site of the development is wholly located outside any relevant Concept Plan boundary. The following Concept Plans are relevant:</p> <table border="1" data-bbox="887 1375 1506 1675"> <thead> <tr> <th data-bbox="887 1375 1506 1451">Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="887 1460 1506 1675"> <p>Concept Plan 79 - Primary Pedestrian Area Concept Plan 125 – City Riverbank – West, Adelaide</p> </td> </tr> </tbody> </table> <p>In relation to DTS/DPF 7.1, in instances where:</p> <p>(a) one or more Concept Plan is returned, refer to Part 12 - Concept Plans in the Planning and Design Code to determine if a Concept Plan is relevant to the site of the proposed</p>	Description	<p>Concept Plan 79 - Primary Pedestrian Area Concept Plan 125 – City Riverbank – West, Adelaide</p>
Description			
<p>Concept Plan 79 - Primary Pedestrian Area Concept Plan 125 – City Riverbank – West, Adelaide</p>			

	<p>development. Note: multiple concept plans may be relevant.</p> <p>(b) in instances where 'no value' is returned, there is no relevant concept plan and DTS/DPF 7.1 is met.</p>
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Table 1 – Accepted Development Classification - No change

Table 2 – Deemed-to-Satisfy Development Classification - No change

Table 3 - Applicable Policies for Performance Assessed Development – No change

Table 4 – Restricted Development Classification – No change

Table 5 – Procedural Matters (PM) – Notification – No change

Attachment 8 – Tracked change version of City Riverbank Zone

Note:

Changes proposed by the Code Amendment are outlined as follows:

- Deletion shown by red text with strikethrough e.g. ~~remove text~~
- Addition shown by green text with underline e.g. add text.

City Riverbank Zone

Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	Exemplary design quality and architecture that is contemporary and innovative and respectful of the heritage buildings, Adelaide Park Lands setting and civic functions of the locality.
DO 2	A fine grained precinct with a quality public realm that is inviting and comfortable for pedestrians.
DO 3	Strong visual and physical connections between important buildings, public spaces, the Adelaide Park Lands and other key destinations.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Use and Intensity	
PO 1.1 A diverse range of <u>community, commercial and employment generating</u> land uses <u>(not including residential development)</u> that connect the city centre to the natural environment of the River Torrens and Adelaide Park Lands	DTS/DPF 1.1 Development comprises one or more of the following: (a) Advertisement (b) <u>Arena</u> (b) (c) <u>Community centre</u> (e) (d) <u>Consulting room</u> (d) (e) <u>Office</u>

<p>with clusters of related activities, such as:</p> <ul style="list-style-type: none"> (a) clinical health, training, education and research (b) entertainment, tourism and accommodation (c) education and administration (d) innovative science and employment (e) community and cultural institutions. 	<ul style="list-style-type: none"> (e)(f) Convention centre (f)(g) Educational establishment (g)(h) Entertainment venue (h)(i) Helicopter landing facility (i)(j) Hospital (j)(k) Hotel (k)(l) Licensed premises in association with hotel, restaurant, shop or the like (l)(m) Land division (m)(n) Light industry (including high technology and research based activity) (n)(o) Pre-school (o)(p) Shop (p) Serviced apartments (q) Tourist accommodation.
<p>PO 1.2</p> <p>Changes in the use of land between similar businesses encourages the efficient reuse of commercial premises and supports continued local access to a range of services compatible to the locality.</p>	<p>DTS/DPF 1.2</p> <p>A change of use to a shop, office, consulting room or any combination of these uses where all of the following are achieved:</p> <ul style="list-style-type: none"> (a) the area to be occupied by the proposed development is located in an existing building and is currently used as a shop, office, consulting room or any combination of these uses (b) if the proposed change of use is for a shop that primarily involves the handling and sale of foodstuffs, areas used for the storage and collection of refuse are sited at least 10m from any neighbourhood-type zone, or the site of a dwelling (other than a dwelling directly associated with the proposed shop) (c) if the proposed change of use is for a shop that primarily involves heating and cooking of foodstuffs in a commercial kitchen and is within 30m of any neighbourhood-

	<p>type zone boundary or a dwelling (other than a dwelling directly associated with the proposed shop), an exhaust duct and stack (chimney) exists or is capable of being installed for discharging exhaust emissions</p> <p>(d) if the change in use involves a gross leasable floor area greater than 250m² and has direct frontage to a state maintained road, it achieves either (i) or (ii):</p> <p>(i) the primary vehicle access (being the access where the majority of vehicles access / egress the site of the proposed development) is from a road that is not an arterial road</p> <p>(ii) the development is located on a site that operates as an integrated complex containing two or more tenancies (and which may comprise more than one building) where facilities for off-street vehicle parking, vehicle loading and unloading, and the storage and collection of refuse are shared.</p>
<p>Built Form and Character</p>	
<p>PO 2.1</p> <p>Building heights provide an orderly transition in scale, with lower buildings located towards the Adelaide Park Lands, Adelaide Botanic Garden and River Torrens and taller buildings towards North Terrace.</p>	<p>DTS/DPF 2.1</p> <p>None are applicable.</p>
<p>PO 2.2</p> <p>Development:</p>	<p>DTS/DPF 2.2</p> <p>None are applicable.</p>

<p>(a) contributes to the activation of the public realm by presenting an attractive human scaled pedestrian-oriented frontage at ground level that adds interest and vibrancy</p> <p>(b) contributes to pedestrian comfort by minimising micro climatic impacts</p> <p>(c) maintains a sense of openness to the sky for pedestrians and allow sunlight access to the public realm, particularly plaza areas during the Spring and Autumn</p> <p>(d) provides a clear sense of address to each building</p> <p>and</p> <p>(e) is compatible with the topography of the site and change in character from a strong city edge on the southern side of North Terrace to the landscaped setting provided by the River Torrens and Adelaide Park Lands.</p>	
<p>PO 2.3</p> <p>Development reinforces the grand boulevard character of North Terrace and King William Road by reflecting the patterns of landscaped spaces and built form, building proportions and scale.</p>	<p>DTS/DPF 2.3</p> <p>None are applicable.</p>
<p>PO 2.4</p> <p>Coordinated development provides public spaces and landscaping, including deep plantings that soften the dominance of buildings and provide a range of spaces that are suitable for group meetings,</p>	<p>DTS/DPF 2.4</p> <p>None are applicable.</p>

<p>social activities and passive enjoyment.</p>	
<p>PO 2.5 Pedestrian shelter, public art, street furniture and the like designed as an integral part of built form, open space and landscaping.</p>	<p>DTS/DPF 2.5 None are applicable.</p>
<p>PO 2.6 The contribution of heritage buildings is enhanced by ensuring:</p> <ul style="list-style-type: none"> (a) buildings can be adapted and reused for modern purposes while protecting important heritage fabric (b) views and physical connections to heritage buildings and their important heritage features is maintained (c) the ground level interface with heritage buildings incorporates publicly accessible spaces and active land uses that support public access where appropriate. 	<p>DTS/DPF 2.6 None are applicable.</p>
<p><u>PO 2.7</u> <u>Development recognises the Karrawirra Pari / Riverbank precinct as a place of gathering and significance for traditional indigenous custodians, through visible, authentic and immersive initiatives that:</u></p> <ul style="list-style-type: none"> <u>(a) celebrate, tell and bring to life the stories of the traditional custodians</u> 	<p><u>DTS/DPF 2.7</u> <u>None are applicable.</u></p>

<p><u>(b) reinforce the identity and purpose of the Karrawirra Pari precinct</u></p> <p><u>(c) rehabilitate the river corridor, that can be used as an educative tool for indigenous culture and practices.</u></p>	
<p>Advertising</p>	
<p>PO 3.1</p> <p>Advertisements designed to achieve an overall consistency of appearance and be of a type, scale and image that complement the zone.</p>	<p>DTS/DPF 3.1</p> <p>None are applicable.</p>
<p>Movement, parking and access</p>	
<p>PO 4.1</p> <p>Pedestrian and cycle movement based on a network of pathways linking the surrounding zones and providing a variety of north-south and east-west links including:</p> <p>(a) connections between North Terrace and the River Torrens linear park at key pedestrian focal points, in particular:</p> <p>(i) the continuation of Bank Street connecting through to the Adelaide Oval footbridge,</p> <p>(ii) along the western side of the Adelaide Railway Station Building connecting through to the Adelaide oval footbridge</p> <p>(iii) the continuation of Gray Street</p> <p>(iv) along Montefiore Road through to Morphett Street</p>	<p>DTS/DPF 4.1</p> <p>None are applicable.</p>

<p>(v) along King William Road through to King William Street</p> <p>(b) the Gawler Greenway, Outer Harbor Greenway and River Torrens Linear Park trail</p> <p><u>(c) the Adelaide Park Lands trail through the Innovation Subzone to connect to the existing trail to the north</u> along the western boundary of the Innovation Subzone</p> <p><u>(d) an east-west connection across the railway line from the Royal Adelaide Hospital through to Gaol Road and beyond to Bonython Park</u></p> <p>(c)<u>(e) improved east-west connections between land located on the eastern and western sides of Montefiore Road.</u></p>	
<p>PO 4.2</p> <p>A central pedestrian pathway designed as a single plane surface and maintained to:</p> <p>(a) allow people to walk and ride through and within the Zone from East to West and connect with the North to South pathways</p> <p>(b) link key buildings and public areas within the Zone.</p>	<p>DTS/DPF 4.2</p> <p>None are applicable.</p>
<p>PO 4.3</p> <p>Pedestrian movement prioritised and designed to be free from vehicle conflict.</p>	<p>DTS/DPF 4.3</p> <p>None are applicable.</p>
<p>PO 4.4</p> <p>Development provides a safe night-time environment along</p>	<p>DTS/DPF 4.4</p> <p>None are applicable.</p>

<p>streetscapes, pedestrian and cycle paths and building surrounds by the arrangement of buildings and active building frontages that enhance casual surveillance and provide appropriate lighting and clear lines of sight.</p>				
<p>Concept Plans</p>				
<p>PO 5.1 Development is compatible with the outcomes sought by any relevant Concept Plan contained within Part 12 - Concept Plans of the Planning and Design Code to support the orderly development of land.</p>	<p>DTS/DPF 5.1 The site of the development is wholly located outside any relevant Concept Plan boundary. The following Concept Plans are relevant:</p> <table border="1" data-bbox="810 896 1490 1196"> <thead> <tr> <th data-bbox="810 896 1490 972">Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="810 974 1490 1084"> <p>Concept Plan 85 - City Riverbank Innovation, Adelaide</p> </td> </tr> <tr> <td data-bbox="810 1086 1490 1196"> <p>Concept Plan 125 – City Riverbank – West, Adelaide</p> </td> </tr> </tbody> </table> <p>In relation to DTS/DPF 5.1, in instances where:</p> <ul style="list-style-type: none"> (a) one or more Concept Plan is returned, refer to Part 12 - Concept Plans in the Planning and Design Code to determine if a Concept Plan is relevant to the site of the proposed development. Note: multiple concept plans may be relevant. (b) in instances where ‘no value’ is returned, there is no relevant concept plan and DTS/DPF 5.1 is met. 	Description	<p>Concept Plan 85 - City Riverbank Innovation, Adelaide</p>	<p>Concept Plan 125 – City Riverbank – West, Adelaide</p>
Description				
<p>Concept Plan 85 - City Riverbank Innovation, Adelaide</p>				
<p>Concept Plan 125 – City Riverbank – West, Adelaide</p>				

Table 1 – Accepted Development Classification - No change

Table 2 – Deemed-to-Satisfy Development Classification - No change

Table 3 - Applicable Policies for Performance Assessed Development

The following table identifies the policies that are applicable to the assessment of the identified Class of Development. Policies referred to are Performance Outcome policies, and any associated Designated Performance Features. Relevant Desired Outcomes are not listed, but automatically apply in relation to a Performance Assessed Development. Where a development comprises more than one Class of Development the relevant policies will be taken to be the sum of the applicable policies for each Class of Development.

Class of Development	Applicable Policies			
	Zone	General Development Policies	Subzone (applies only in the area affected by the Subzone)	Overlay (applies only in the area affected by the Overlay)
Advertisement	Advertising PO 3.1	Advertisements [Appearance] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5 Advertisements [Proliferation of Advertisements] PO 2.1, PO 2.2, PO 2.3 Advertisements [Advertising Content] PO 3.1 Advertisements [Amenity Impacts] PO 4.1 Advertisements [Safety] PO 5.1, PO 5.2, PO 5.3, PO 5.4, PO 5.5, PO 5.6 Clearance from Overhead Powerlines PO 1.1 Infrastructure and Renewable Energy Facilities [Wastewater Services] PO 12.2	Innovation Subzone [Advertising] PO 6.1, PO 6.2	Advertising Near Signalised Intersections Overlay [Advertisements Near Signalised Intersections] PO 1.1 Airport Building Heights (Aircraft Landing Areas) Overlay [Built Form] PO 1.1 Airport Building Heights (Regulated) Overlay [Built Form] PO 1.1 Building Near Airfields Overlay PO 1.3 Character Area Overlay [All Development] PO 1.1 Character Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.5 Character Area Overlay [Ancillary Development] PO 4.3 Character Area Overlay [Context and Streetscape Amenity] PO 6.2 Character Preservation District Overlay [Built Form and Character] PO 2.1, PO 2.2, PO 2.3 Character Preservation District Overlay [Built Form and Character in the Rural Area] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5 Character Preservation District Overlay [Earthworks] PO 4.1 Coastal Flooding Overlay PO 1.1 Defence Aviation Area Overlay [Built Form] PO 1.1 Future Local Road Widening Overlay [Future

				<p>Road Widening] PO 1.1</p> <p>Future Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Gateway Overlay [Advertisements] PO 4.1</p> <p>Hazards (Flooding) Overlay [Flood Resilience] PO 3.1, PO 3.2, PO 3.3</p> <p>Hazards (Flooding) Overlay [Environmental Protection] PO 4.2</p> <p>Heritage Adjacency Overlay [Built Form] PO 1.1</p> <p>Historic Area Overlay [All Development] PO 1.1</p> <p>Historic Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.5</p> <p>Historic Area Overlay [Ancillary development] PO 4.3</p> <p>Historic Area Overlay [Context and Streetscape Amenity] PO 6.2</p> <p>Historic Area Overlay [Ruins] PO 8.1</p> <p>Local Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>Local Heritage Place Overlay [Alterations and Additions] PO 2.1, PO 2.2</p> <p>Local Heritage Place Overlay [Ancillary Development] PO 3.3</p> <p>Native Vegetation Overlay [Environmental Protection] PO 1.1, PO 1.2, PO 1.4</p> <p>Non-Stop Corridors Overlay [Non-Stop Corridor Overlay] PO 1.1</p> <p>Scenic Quality Overlay [Land Use and Intensity] PO 1.1</p> <p>Scenic Quality Overlay [Built Form and Character] PO 2.1</p> <p>Significant Landscape Protection Overlay [Land Use and Intensity] PO 1.1</p> <p>Significant Landscape Protection Overlay [Built</p>
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				<p>Form and Character] PO 2.1, PO 2.2</p> <p>Significant Landscape Protection Overlay [Landscaping] PO 3.1</p> <p>Significant Landscape Protection Overlay [Earthworks] PO 4.1</p> <p>State Heritage Area Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>State Heritage Area Overlay [Ancillary Development] PO 3.3</p> <p>State Heritage Area Overlay [Landscape Context and Streetscape Amenities] PO 5.1</p> <p>State Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6</p> <p>State Heritage Place Overlay [Ancillary Development] PO 3.3</p> <p>State Heritage Place Overlay [Landscape Context and Streetscape Amenities] PO 5.1</p> <p>State Significant Native Vegetation Areas Overlay [Environmental Protection] PO 1.1</p>
Consulting room	<p>Land Use and Intensity PO 1.1</p> <p>Built Form and Character PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7</p> <p>Movement, parking and access PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Concept Plans PO 5.1</p>	<p>Clearance from Overhead Powerlines PO 1.1</p> <p>Design in Urban Areas [All Development [External Appearance]] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>Design in Urban Areas [All Development [Safety]] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Design in Urban Areas [All Development [Landscaping]] PO 3.1</p> <p>Design in Urban Areas [All Development [Environmental Performance]] PO 4.1, PO 4.2, PO 4.3</p> <p>Design in Urban Areas [All Development [On-site Waste Treatment Systems]] PO 6.1</p>	<p>Cultural Institutions Subzone [Land Use and Intensity] PO 1.1, PO 1.2</p> <p>Cultural Institutions Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Entertainment Subzone [Land Use and Intensity] PO 1.1, PO 1.2</p> <p>Entertainment Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7, PO 2.8</p> <p>Health Subzone [Land Use and Intensity] PO 1.1, PO 1.2, PO 1.3, PO 1.4</p>	<p>Aircraft Noise Exposure Overlay [Land Use and Intensity] PO 1.1</p> <p>Airport Building Heights (Aircraft Landing Areas) Overlay [Built Form] PO 1.1</p> <p>Airport Building Heights (Regulated) Overlay [Built Form] PO 1.1</p> <p>Building Near Airfields Overlay PO 1.1, PO 1.2, PO 1.3</p> <p>Character Area Overlay [All Development] PO 1.1</p> <p>Character Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Character Area Overlay [Alterations and Additions] PO 3.1</p> <p>Character Area Overlay [Context and Streetscape Amenities] PO 6.1, PO 6.2</p> <p>Character Preservation District Overlay [Built Form and Character]</p>

		<p>Design in Urban Areas [All Development [Car parking appearance]] PO 7.1, PO 7.2, PO 7.3, PO 7.4, PO 7.5, PO 7.6, PO 7.7</p> <p>Design in Urban Areas [All Development [Earthworks and sloping land]] PO 8.1, PO 8.2, PO 8.3, PO 8.4, PO 8.5</p> <p>Design in Urban Areas [All Development [Overlooking / Visual Privacy (low rise buildings)]] PO 10.1, PO 10.2</p> <p>Design in Urban Areas [All Development [Site Facilities / Waste Storage (excluding low rise residential development)]] PO 11.1, PO 11.2, PO 11.3, PO 11.4, PO 11.5</p> <p>Design in Urban Areas [All Development - Medium and High Rise [External Appearance]] PO 12.1, PO 12.2, PO 12.3, PO 12.4, PO 12.5, PO 12.6, PO 12.7, PO 12.8</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Landscaping]] PO 13.1, PO 13.2, PO 13.3, PO 13.4</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Environmental]] PO 14.1, PO 14.2, PO 14.3</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Car Parking]] PO 15.1, PO 15.2</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Overlooking/Visual Privacy]] PO 16.1</p> <p>Design in Urban Areas [All non-residential development [Water Sensitive Design]] PO 42.1, PO 42.2, PO 42.3</p> <p>Design in Urban Areas [All non-residential development [Wash-down and Waste Loading and Unloading]] PO 43.1</p>	<p>Health Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6</p> <p>Innovation Subzone [Land Use and Intensity] PO 1.1, PO 1.5</p> <p>Innovation Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Innovation Subzone [Building Height] PO 3.1, PO 3.2</p> <p>Innovation Subzone [Open Space] PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Innovation Subzone [Movement and parking] PO 5.1, PO 5.2</p>	<p>PO 2.1, PO 2.2, PO 2.3</p> <p>Character Preservation District Overlay [Built Form and Character in the Rural Area] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5, PO 3.6</p> <p>Character Preservation District Overlay [Earthworks] PO 4.1</p> <p>Coastal Areas Overlay [Hazard Risk Minimisation] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Coastal Areas Overlay [Coast Protection Works] PO 3.1, PO 3.2</p> <p>Coastal Areas Overlay [Environment Protection] PO 4.1, PO 4.2, PO 4.3, PO 4.4, PO 4.5, PO 4.6, PO 4.7</p> <p>Coastal Areas Overlay [Access] PO 5.1, PO 5.2, PO 5.4</p> <p>Coastal Flooding Overlay PO 1.1</p> <p>Defence Aviation Area Overlay [Built Form] PO 1.1, PO 1.2</p> <p>Design Overlay [General] PO 1.1</p> <p>Future Local Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Future Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines Overlay [Land Use and Intensity] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines (Facilities) Overlay [Safety] PO 1.1</p> <p>Gateway Overlay [Built Form and Character] PO 1.1, PO 1.2, PO 1.3</p> <p>Gateway Overlay [Landscaping] PO 3.1, PO 3.2, PO 3.3, PO 3.4</p> <p>Hazards (Acid Sulfate Soils) Overlay [Land Use and Intensity] PO 1.1</p> <p>Hazards (Bushfire - General Risk) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - General Risk) Overlay [Built Form] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - General Risk) Overlay [Vehicle Access – Roads, Driveways and Fire</p>
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				<p>Local Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>Local Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Major Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - Existing Access Points] PO 3.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - New Access Points] PO 4.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Major Urban Transport Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Major Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Major Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Major Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Water Quality] PO 1.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Wastewater] PO 2.1, PO 2.2, PO 2.3, PO 2.4</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Stormwater] PO 3.1, PO 3.2, PO 3.3, PO 3.9</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Landscapes and Natural Features] PO 4.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Water Quality]</p>
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				<p>PO 1.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Wastewater] PO 2.1, PO 2.3, PO 2.4, PO 2.5</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Stormwater] PO 3.1, PO 3.2, PO 3.3, PO 3.9</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Landscapes and Natural Features] PO 4.1</p> <p>Native Vegetation Overlay [Environmental Protection] PO 1.1, PO 1.2, PO 1.4</p> <p>Non-Stop Corridors Overlay [Non-Stop Corridor Overlay] PO 1.1</p> <p>Resource Extraction Protection Area Overlay [Protection of Strategic Resources] PO 1.1</p> <p>River Murray Flood Plain Protection Area Overlay [Wastewater] PO 1.1</p> <p>River Murray Flood Plain Protection Area Overlay [Built Form and Character] PO 4.1, PO 4.3</p> <p>River Murray Flood Plain Protection Area Overlay [Flood Resilience] PO 5.1, PO 5.2</p> <p>River Murray Flood Plain Protection Area Overlay [Environmental Protection] PO 6.1, PO 6.2, PO 6.3</p> <p>River Murray Flood Plain Protection Area Overlay [Access] PO 7.1, PO 7.2, PO 7.3</p> <p>Scenic Quality Overlay [Land Use and Intensity] PO 1.1</p> <p>Scenic Quality Overlay [Built Form and Character] PO 2.1</p> <p>Scenic Quality Overlay [Landscaping] PO 3.1</p> <p>Scenic Quality Overlay [Earthworks] PO 4.1</p> <p>Significant Interface Management Overlay [Land Use and Intensity] PO 1.1</p> <p>Significant Landscape Protection Overlay [Land Use and Intensity] PO 1.1</p>
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				<p>PO 6.1</p> <p>Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Urban Tree Canopy Overlay PO 1.1</p> <p>Water Resources Overlay [Water Catchment] PO 1.1, PO 1.2, PO 1.5, PO 1.6, PO 1.7, PO 1.8</p>
Demolition	None	None	None	<p>Historic Area Overlay [All Development] PO 1.1</p> <p>Historic Area Overlay [Demolition] PO 7.1, PO 7.2, PO 7.3</p> <p>Historic Area Overlay [Ruins] PO 8.1</p> <p>Local Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>Local Heritage Place Overlay [Demolition] PO 6.1, PO 6.2</p> <p>Local Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>State Heritage Area Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Area Overlay [Demolition] PO 6.1</p> <p>State Heritage Area Overlay [Conservation Works] PO 7.1</p> <p>State Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Place Overlay [Demolition] PO 6.1</p> <p>State Heritage Place Overlay [Conservation Works] PO 7.1</p>

Licensed Premises	<p>Land Use and Intensity PO 1.1</p> <p>Built Form and Character PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7</p> <p>Movement, parking and access PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Concept Plans PO 5.1</p>	<p>Clearance from Overhead Powerlines PO 1.1</p> <p>Design in Urban Areas [All Development [External Appearance]] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>Design in Urban Areas [All Development [Safety]] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Design in Urban Areas [All Development [Landscaping]] PO 3.1</p> <p>Design in Urban Areas [All Development [Environmental Performance]] PO 4.1, PO 4.2, PO 4.3</p> <p>Design in Urban Areas [All Development [On-site Waste Treatment Systems]] PO 6.1</p> <p>Design in Urban Areas [All Development [Car parking appearance]] PO 7.1, PO 7.2, PO 7.3, PO 7.4, PO 7.5, PO 7.6, PO 7.7</p> <p>Design in Urban Areas [All Development [Earthworks and sloping land]] PO 8.1, PO 8.2, PO 8.3, PO 8.4, PO 8.5</p> <p>Design in Urban Areas [All Development [Overlooking / Visual Privacy (low rise buildings)]] PO 10.1, PO 10.2</p> <p>Design in Urban Areas [All Development [Site Facilities / Waste Storage (excluding low rise residential development)]] PO 11.1, PO 11.2, PO 11.3, PO 11.4, PO 11.5</p> <p>Design in Urban Areas [All Development - Medium and High Rise [External Appearance]] PO 12.1, PO 12.2, PO 12.3, PO 12.4, PO 12.5, PO 12.6, PO 12.7, PO 12.8</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Landscaping]]</p>	<p>Cultural Institutions Subzone [Land Use and Intensity] PO 1.1, PO 1.2</p> <p>Cultural Institutions Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Entertainment Subzone [Land Use and Intensity] PO 1.1</p> <p>Entertainment Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7, PO 2.8</p> <p>Health Subzone [Land Use and Intensity] PO 1.1, PO 1.2, PO 1.3, PO 1.4</p> <p>Health Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6</p> <p>Innovation Subzone [Land Use and Intensity] PO 1.1, PO 1.3, PO 1.4, PO 1.5</p> <p>Innovation Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Innovation Subzone [Building Height] PO 3.1, PO 3.2</p> <p>Innovation Subzone [Open Space] PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Innovation Subzone [Movement and parking] PO 5.1, PO 5.2</p>	<p>Aircraft Noise Exposure Overlay [Land Use and Intensity] PO 1.1</p> <p>Airport Building Heights (Aircraft Landing Areas) Overlay [Built Form] PO 1.1</p> <p>Airport Building Heights (Regulated) Overlay [Built Form] PO 1.1</p> <p>Building Near Airfields Overlay PO 1.3</p> <p>Character Area Overlay [All Development] PO 1.1</p> <p>Character Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Character Area Overlay [Context and Streetscape Amenity] PO 6.1, PO 6.2</p> <p>Coastal Areas Overlay [Hazard Risk Minimisation] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Coastal Areas Overlay [Coast Protection Works] PO 3.1, PO 3.2</p> <p>Coastal Areas Overlay [Environment Protection] PO 4.1, PO 4.2, PO 4.3, PO 4.4, PO 4.5, PO 4.6, PO 4.7</p> <p>Coastal Areas Overlay [Access] PO 5.1, PO 5.2, PO 5.4</p> <p>Coastal Flooding Overlay PO 1.1</p> <p>Defence Aviation Area Overlay [Built Form] PO 1.1</p> <p>Design Overlay [General] PO 1.1</p> <p>Future Local Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Future Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines Overlay [Land Use and Intensity] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines (Facilities) Overlay [Safety] PO 1.1</p> <p>Gateway Overlay [Built Form and Character] PO 1.1, PO 1.2, PO 1.3</p> <p>Gateway Overlay [Landscaping]</p>
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		<p>PO 13.1, PO 13.2, PO 13.3, PO 13.4</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Environmental]] PO 14.1, PO 14.2, PO 14.3</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Car Parking]] PO 15.1, PO 15.2</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Overlooking/Visual Privacy]] PO 16.1</p> <p>Design in Urban Areas [All non-residential development [Water Sensitive Design]] PO 42.1, PO 42.2, PO 42.3</p> <p>Design in Urban Areas [All non-residential development [Wash-down and Waste Loading and Unloading]] PO 43.1</p> <p>Design in Urban Areas [Laneway Development [Infrastructure and Access]] PO 44.1</p> <p>Interface between Land Uses [Hours of Operation] PO 2.1</p> <p>Interface between Land Uses [Overshadowing] PO 3.1, PO 3.2, PO 3.3</p> <p>Interface between Land Uses [Activities Generating Noise or Vibration] PO 4.1, PO 4.2, PO 4.5, PO 4.6</p> <p>Interface between Land Uses [Air Quality] PO 5.2</p> <p>Interface between Land Uses [Light Spill] PO 6.1</p> <p>Interface between Land Uses [Solar Reflectivity / Glare] PO 7.1</p> <p>Site Contamination PO 1.1</p> <p>Transport, Access and Parking [Movement</p>		<p>PO 3.1, PO 3.2, PO 3.3, PO 3.4</p> <p>Hazards (Acid Sulfate Soils) Overlay [Land Use and Intensity] PO 1.1</p> <p>Hazards (Flooding) Overlay [Flood Resilience] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5</p> <p>Hazards (Flooding) Overlay [Environmental Protection] PO 4.2</p> <p>Hazards (Flooding) Overlay [Site Earthworks] PO 5.1, PO 5.2</p> <p>Hazards (Flooding) Overlay [Access] PO 6.1, PO 6.2</p> <p>Hazards (Flooding – General) Overlay [Flood Resilience] PO 2.1</p> <p>Hazards (Flooding - Evidence Required) Overlay [Flood Resilience] PO 1.1</p> <p>Heritage Adjacency Overlay [Built Form] PO 1.1</p> <p>Historic Area Overlay [All Development] PO 1.1</p> <p>Historic Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Historic Area Overlay [Alterations and additions] PO 3.1, PO 3.2</p> <p>Historic Area Overlay [Context and Streetscape Amenities] PO 6.1, PO 6.2</p> <p>Historic Area Overlay [Ruins] PO 8.1</p> <p>Historic Shipwrecks Overlay [General] PO 1.1</p> <p>Interface Management Overlay [Land Use and Intensity] PO 1.1</p> <p>Key Railway Crossings Overlay [Access, Design and Function] PO 1.1</p> <p>Local Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>Local Heritage Place Overlay [Landscape Context and Streetscape Amenities] PO 5.1</p> <p>Local Heritage Place Overlay [Conservation Works]</p>
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		<p>Systems] PO 1.4</p> <p>Transport, Access and Parking [Sightlines] PO 2.1, PO 2.2</p> <p>Transport, Access and Parking [Vehicle Access] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5, PO 3.6, PO 3.7, PO 3.8, PO 3.9</p> <p>Transport, Access and Parking [Access for People with Disabilities] PO 4.1</p> <p>Transport, Access and Parking [Vehicle Parking Rates] PO 5.1</p> <p>Transport, Access and Parking [Vehicle Parking Areas] PO 6.1, PO 6.2, PO 6.3, PO 6.4, PO 6.5, PO 6.6</p> <p>Transport, Access and Parking [Undercroft and Below Ground Garaging and Parking of Vehicles] PO 7.1</p> <p>Transport, Access and Parking [Bicycle Parking in Designated Areas] PO 9.1, PO 9.2, PO 9.3</p> <p>Transport, Access and Parking [Corner Cut-Offs] PO 10.1</p>		<p>PO 7.1</p> <p>Major Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Major Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - Existing Access Points] PO 3.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - New Access Points] PO 4.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Major Urban Transport Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Major Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Major Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Major Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Non-Stop Corridors Overlay [Non-Stop Corridor Overlay] PO 1.1</p> <p>Resource Extraction Protection Area Overlay [Protection of Strategic Resources] PO 1.1</p> <p>Significant Interface Management Overlay [Land Use and Intensity] PO 1.1</p> <p>State Heritage Area Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>State Heritage Area Overlay [Alterations and Additions] PO 2.1</p> <p>State Heritage Area Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Area Overlay [Conservation Works] PO 7.1</p>
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				<p>State Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>State Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>Stormwater Management Overlay PO 1.1</p> <p>Traffic Generating Development Overlay [Traffic Generating Development] PO 1.1, PO 1.2, PO 1.3</p> <p>Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Urban Transport Routes Overlay [Access - (Location Spacing) - Existing Access Point] PO 3.1</p> <p>Urban Transport Routes Overlay [Access – Location (Spacing) – New Access Points] PO 4.1</p> <p>Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Urban Transport Routes Overlay [Access – Mud and Debris] PO 6.1</p> <p>Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Urban Tree Canopy Overlay PO 1.1</p> <p>Water Resources Overlay [Water Catchment] PO 1.1, PO 1.2, PO 1.5, PO 1.6, PO 1.7, PO 1.8</p>
Light industry	Land Use and Intensity	Clearance from Overhead Powerlines	Cultural Institutions Subzone [Land Use	Adelaide Dolphin Sanctuary Overlay [Land Use] PO 1.1, PO 1.2, PO 1.3

	<p>PO 1.1</p> <p>Built Form and Character PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7</p> <p>Movement, parking and access PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Concept Plans PO 5.1</p>	<p>PO 1.1</p> <p>Design [All development [External Appearance]] PO 1.5</p> <p>Design [All development [On-site Waste Treatment Systems]] PO 6.1</p> <p>Design [All development [Carparking Appearance]] PO 7.1, PO 7.2, PO 7.4, PO 7.5, PO 7.6, PO 7.7</p> <p>Design [All development [Earthworks and sloping land]] PO 8.1</p> <p>Infrastructure and Renewable Energy Facilities [Water Supply] PO 11.1</p> <p>Infrastructure and Renewable Energy Facilities [Wastewater Services] PO 12.1, PO 12.2</p> <p>Interface between Land Uses [Activities Generating Noise or Vibration] PO 4.1, PO 4.2, PO 4.5</p> <p>Interface between Land Uses [Air Quality] PO 5.1, PO 5.2</p> <p>Interface between Land Uses [Light Spill] PO 6.1</p> <p>Transport, Access and Parking [Movement Systems] PO 1.4</p> <p>Transport, Access and Parking [Vehicle Access] PO 3.1, PO 3.5</p> <p>Transport, Access and Parking [Vehicle Parking Rates] PO 5.1</p> <p>Transport, Access and Parking [Vehicle Parking Areas] PO 6.1, PO 6.6</p>	<p>and Intensity] PO 1.1, PO 1.2</p> <p>Cultural Institutions Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Entertainment Subzone [Land Use and Intensity] PO 1.1, PO 1.2</p> <p>Entertainment Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7, PO 2.8</p> <p>Health Subzone [Land Use and Intensity] PO 1.1, PO 1.2, PO 1.3, PO 1.4</p> <p>Health Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6</p> <p>Innovation Subzone [Land Use and Intensity] PO 1.1, PO 1.5</p> <p>Innovation Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Innovation Subzone [Building Height] PO 3.1, PO 3.2</p> <p>Innovation Subzone [Open Space] PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Innovation Subzone [Movement and parking] PO 5.1, PO 5.2</p>	<p>Airport Building Heights (Aircraft Landing Areas) Overlay [Built Form] PO 1.1</p> <p>Airport Building Heights (Regulated) Overlay [Built Form] PO 1.1</p> <p>Building Near Airfields Overlay PO 1.1, PO 1.2, PO 1.3</p> <p>Character Area Overlay [All Development] PO 1.1</p> <p>Character Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Character Area Overlay [Alterations and Additions] PO 3.1</p> <p>Character Area Overlay [Context and Streetscape Amenity] PO 6.1, PO 6.2</p> <p>Character Preservation District Overlay [Built Form and Character] PO 2.1, PO 2.2, PO 2.3</p> <p>Character Preservation District Overlay [Built Form and Character in the Rural Area] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5, PO 3.6</p> <p>Character Preservation District Overlay [Earthworks] PO 4.1</p> <p>Coastal Areas Overlay [Hazard Risk Minimisation] PO 2.1, PO 2.2, PO 2.3, PO 2.4</p> <p>Coastal Areas Overlay [Coast Protection Works] PO 3.1, PO 3.2</p> <p>Coastal Areas Overlay [Environment Protection] PO 4.1, PO 4.2, PO 4.3, PO 4.4, PO 4.5, PO 4.6, PO 4.7</p> <p>Coastal Areas Overlay [Access] PO 5.1, PO 5.2, PO 5.3, PO 5.4</p> <p>Coastal Flooding Overlay PO 1.1</p> <p>Defence Aviation Area Overlay [Built Form] PO 1.1, PO 1.2</p> <p>Future Local Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Future Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines Overlay [Land Use and Intensity] PO 1.1, PO 1.3</p>
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				<p>Gas and Liquid Petroleum Pipelines (Facilities) Overlay [Safety] PO 1.1</p> <p>Gateway Overlay [Built Form and Character] PO 1.1, PO 1.2, PO 1.3</p> <p>Gateway Overlay [Landscape Amenity] PO 2.1</p> <p>Gateway Overlay [Landscaping] PO 3.1, PO 3.2, PO 3.3, PO 3.4</p> <p>Hazards (Acid Sulfate Soils) Overlay [Land Use and Intensity] PO 1.1</p> <p>Hazards (Bushfire - General Risk) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - General Risk) Overlay [Built Form] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - General Risk) Overlay [Vehicle Access – Roads, Driveways and Fire Tracks] PO 5.1, PO 5.2, PO 5.3</p> <p>Hazards (Bushfire - High Risk) Overlay [Land Use] PO 1.1</p> <p>Hazards (Bushfire - High Risk) Overlay [Siting] PO 2.1</p> <p>Hazards (Bushfire - High Risk) Overlay [Built Form] PO 3.1, PO 3.2</p> <p>Hazards (Bushfire - High Risk) Overlay [Vehicle Access –Roads, Driveways and Fire Tracks] PO 6.1, PO 6.2, PO 6.3</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Built Form] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Vehicle Access - Roads, Driveways and Fire Tracks] PO 5.1, PO 5.2, PO 5.3</p> <p>Hazards (Bushfire - Outback) Overlay [Vehicle Access - Roads and Driveways] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - Regional) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - Regional) Overlay [Built Form] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - Regional) Overlay [Vehicle</p>
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				<p>Access -Roads and Driveways] PO 5.1, PO 5.2, PO 5.3</p> <p>Hazards (Flooding) Overlay [Flood Resilience] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5</p> <p>Hazards (Flooding) Overlay [Environmental Protection] PO 4.1, PO 4.2</p> <p>Hazards (Flooding) Overlay [Site Earthworks] PO 5.1, PO 5.2</p> <p>Hazards (Flooding) Overlay [Access] PO 6.1, PO 6.2</p> <p>Hazards (Flooding – General) Overlay [Flood Resilience] PO 2.1</p> <p>Hazards (Flooding – General) Overlay [Environmental Protection] PO 3.1</p> <p>Hazards (Flooding - Evidence Required) Overlay [Flood Resilience] PO 1.1</p> <p>Hazards (Flooding - Evidence Required) Overlay [Environmental Protection] PO 2.1</p> <p>Heritage Adjacency Overlay [Built Form] PO 1.1</p> <p>Historic Area Overlay [All Development] PO 1.1</p> <p>Historic Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Historic Area Overlay [Alterations and additions] PO 3.1, PO 3.2</p> <p>Historic Area Overlay [Context and Streetscape Amenity] PO 6.1, PO 6.2</p> <p>Historic Area Overlay [Ruins] PO 8.1</p> <p>Historic Shipwrecks Overlay [General] PO 1.1</p> <p>Key Outback and Rural Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Key Outback and Rural Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Key Outback and Rural Routes Overlay [Access - Existing Access Points] PO 3.1</p> <p>Key Outback and Rural Routes Overlay [Access -</p>
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				<p>Location (Spacing) PO 4.1</p> <p>Key Outback and Rural Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Key Outback and Rural Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Key Outback and Rural Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Key Outback and Rural Routes Overlay [Public Road Junctions] PO 8.1</p> <p>Key Railway Crossings Overlay [Access, Design and Function] PO 1.1</p> <p>Local Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>Local Heritage Place Overlay [Alterations and Additions] PO 2.1, PO 2.2</p> <p>Local Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>Local Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Major Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - Existing Access Points] PO 3.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - New Access Points] PO 4.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Major Urban Transport Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Major Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p>
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				<p>Major Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Major Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Major Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Water Quality] PO 1.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Wastewater] PO 2.1, PO 2.2, PO 2.3, PO 2.4</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Stormwater] PO 3.1, PO 3.2, PO 3.3, PO 3.9</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Landscapes and Natural Features] PO 4.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Water Quality] PO 1.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Wastewater] PO 2.1, PO 2.3, PO 2.4, PO 2.5</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Stormwater] PO 3.1, PO 3.2, PO 3.3, PO 3.9</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Landscapes and Natural Features] PO 4.1</p> <p>Murray-Darling Basin Overlay PO 1.1</p> <p>Native Vegetation Overlay [Environmental Protection] PO 1.1, PO 1.2, PO 1.4</p> <p>Non-Stop Corridors Overlay [Non-Stop Corridor Overlay] PO 1.1</p> <p>Prescribed Watercourses Overlay PO 1.1</p> <p>Prescribed Water Resources Area Overlay PO 1.1, PO 1.2</p> <p>Prescribed Wells Area Overlay PO 1.1</p> <p>Ramsar Wetlands Overlay [General]</p>
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				<p>PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6</p> <p>Resource Extraction Protection Area Overlay [Protection of Strategic Resources] PO 1.1</p> <p>River Murray Flood Plain Protection Area Overlay [Built Form and Character] PO 4.1, PO 4.3</p> <p>River Murray Flood Plain Protection Area Overlay [Flood Resilience] PO 5.1, PO 5.2, PO 5.3</p> <p>River Murray Flood Plain Protection Area Overlay [Environmental Protection] PO 6.1, PO 6.2, PO 6.3, PO 6.4, PO 6.5</p> <p>River Murray Flood Plain Protection Area Overlay [Access] PO 7.1, PO 7.2, PO 7.3</p> <p>River Murray Tributaries Protection Area Overlay [Land Use] PO 1.1, PO 1.2</p> <p>Scenic Quality Overlay [Land Use and Intensity] PO 1.1</p> <p>Scenic Quality Overlay [Built Form and Character] PO 2.1</p> <p>Scenic Quality Overlay [Landscaping] PO 3.1</p> <p>Scenic Quality Overlay [Earthworks] PO 4.1</p> <p>Significant Landscape Protection Overlay [Land Use and Intensity] PO 1.1</p> <p>Significant Landscape Protection Overlay [Built Form and Character] PO 2.1, PO 2.2</p> <p>Significant Landscape Protection Overlay [Landscaping] PO 3.1</p> <p>Significant Landscape Protection Overlay [Earthworks] PO 4.1</p> <p>State Heritage Area Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>State Heritage Area Overlay [Alterations and Additions] PO 2.1</p> <p>State Heritage Area Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Area Overlay [Conservation Works] PO 7.1</p>
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				<p>State Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>State Heritage Place Overlay [Alterations and Additions] PO 2.1</p> <p>State Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>State Significant Native Vegetation Areas Overlay [Environmental Protection] PO 1.1</p> <p>Traffic Generating Development Overlay [Traffic Generating Development] PO 1.1, PO 1.2, PO 1.3</p> <p>Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Urban Transport Routes Overlay [Access - (Location Spacing) - Existing Access Point] PO 3.1</p> <p>Urban Transport Routes Overlay [Access - Location (Spacing) - New Access Points] PO 4.1</p> <p>Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Urban Transport Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Water Resources Overlay [Water Catchment]</p>
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				PO 1.1, PO 1.2, PO 1.5, PO 1.6, PO 1.7, PO 1.8, PO 1.9
Office	<p>Land Use and Intensity PO 1.1</p> <p>Built Form and Character PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7</p> <p>Movement, parking and access PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Concept Plans PO 5.1</p>	<p>Clearance from Overhead Powerlines PO 1.1</p> <p>Design in Urban Areas [All Development [External Appearance]] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>Design in Urban Areas [All Development [Safety]] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Design in Urban Areas [All Development [Landscaping]] PO 3.1</p> <p>Design in Urban Areas [All Development [Environmental Performance]] PO 4.1, PO 4.2, PO 4.3</p> <p>Design in Urban Areas [All Development [On-site Waste Treatment Systems]] PO 6.1</p> <p>Design in Urban Areas [All Development [Car parking appearance]] PO 7.1, PO 7.2, PO 7.3, PO 7.4, PO 7.5, PO 7.6, PO 7.7</p> <p>Design in Urban Areas [All Development [Earthworks and sloping land]] PO 8.1, PO 8.2, PO 8.3, PO 8.4, PO 8.5</p> <p>Design in Urban Areas [All Development [Overlooking / Visual Privacy (low rise buildings)]] PO 10.1, PO 10.2</p> <p>Design in Urban Areas [All Development [Site Facilities / Waste Storage (excluding low rise residential development)]] PO 11.1, PO 11.2, PO 11.3, PO 11.4, PO 11.5</p> <p>Design in Urban Areas [All Development - Medium and High Rise [External Appearance]] PO 12.1, PO 12.2, PO 12.3, PO 12.4, PO 12.5, PO 12.6, PO 12.7, PO 12.8</p>	<p>Cultural Institutions Subzone [Land Use and Intensity] PO 1.1, PO 1.2</p> <p>Cultural Institutions Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Entertainment Subzone [Land Use and Intensity] PO 1.1, PO 1.2</p> <p>Entertainment Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7, PO 2.8</p> <p>Health Subzone [Land Use and Intensity] PO 1.1, PO 1.2, PO 1.3, PO 1.4</p> <p>Health Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6</p> <p>Innovation Subzone [Land Use and Intensity] PO 1.1, PO 1.5</p> <p>Innovation Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Innovation Subzone [Building Height] PO 3.1, PO 3.2</p> <p>Innovation Subzone [Open Space] PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Innovation Subzone [Movement and parking] PO 5.1, PO 5.2</p>	<p>Aircraft Noise Exposure Overlay [Land Use and Intensity] PO 1.1</p> <p>Airport Building Heights (Aircraft Landing Areas) Overlay [Built Form] PO 1.1</p> <p>Airport Building Heights (Regulated) Overlay [Built Form] PO 1.1</p> <p>Building Near Airfields Overlay PO 1.3</p> <p>Character Area Overlay [All Development] PO 1.1</p> <p>Character Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Character Area Overlay [Context and Streetscape Amenity] PO 6.1, PO 6.2</p> <p>Character Preservation District Overlay [Built Form and Character] PO 2.1, PO 2.2, PO 2.3</p> <p>Character Preservation District Overlay [Built Form and Character in the Rural Area] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5, PO 3.6</p> <p>Character Preservation District Overlay [Earthworks] PO 4.1</p> <p>Coastal Areas Overlay [Hazard Risk Minimisation] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Coastal Areas Overlay [Coast Protection Works] PO 3.1, PO 3.2</p> <p>Coastal Areas Overlay [Environment Protection] PO 4.1, PO 4.2, PO 4.3, PO 4.4, PO 4.5, PO 4.6, PO 4.7</p> <p>Coastal Areas Overlay [Access] PO 5.1, PO 5.2, PO 5.4</p> <p>Coastal Flooding Overlay PO 1.1</p> <p>Defence Aviation Area Overlay [Built Form] PO 1.1</p> <p>Design Overlay [General] PO 1.1</p> <p>Future Local Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Future Road Widening Overlay [Future Road</p>

		<p>Design in Urban Areas [All Development - Medium and High Rise [Landscaping]] PO 13.1, PO 13.2, PO 13.3, PO 13.4</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Environmental]] PO 14.1, PO 14.2, PO 14.3</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Car Parking]] PO 15.1, PO 15.2</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Overlooking/Visual Privacy]] PO 16.1</p> <p>Design in Urban Areas [All non-residential development [Water Sensitive Design]] PO 42.1, PO 42.2, PO 42.3</p> <p>Design in Urban Areas [All non-residential development [Wash-down and Waste Loading and Unloading]] PO 43.1</p> <p>Design in Urban Areas [Laneway Development [Infrastructure and Access]] PO 44.1</p> <p>Interface between Land Uses [Hours of Operation] PO 2.1</p> <p>Interface between Land Uses [Overshadowing] PO 3.1, PO 3.2, PO 3.3</p> <p>Interface between Land Uses [Activities Generating Noise or Vibration] PO 4.1, PO 4.2, PO 4.5, PO 4.6</p> <p>Interface between Land Uses [Air Quality] PO 5.2</p> <p>Interface between Land Uses [Light Spill] PO 6.1</p> <p>Interface between Land Uses [Solar Reflectivity / Glare] PO 7.1</p> <p>Out of Activity Centre Development</p>		<p>Widening] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines Overlay [Land Use and Intensity] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines (Facilities) Overlay [Safety] PO 1.1</p> <p>Gateway Overlay [Built Form and Character] PO 1.1, PO 1.2, PO 1.3</p> <p>Gateway Overlay [Landscaping] PO 3.1, PO 3.2, PO 3.3, PO 3.4</p> <p>Hazards (Acid Sulfate Soils) Overlay [Land Use and Intensity] PO 1.1</p> <p>Hazards (Bushfire - General Risk) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - General Risk) Overlay [Built Form] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - General Risk) Overlay [Vehicle Access – Roads, Driveways and Fire Tracks] PO 5.1, PO 5.2, PO 5.3</p> <p>Hazards (Bushfire - High Risk) Overlay [Land Use] PO 1.1</p> <p>Hazards (Bushfire - High Risk) Overlay [Siting] PO 2.1</p> <p>Hazards (Bushfire - High Risk) Overlay [Built Form] PO 3.1, PO 3.2</p> <p>Hazards (Bushfire - High Risk) Overlay [Vehicle Access –Roads, Driveways and Fire Tracks] PO 6.1, PO 6.2, PO 6.3</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Built Form] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Vehicle Access - Roads, Driveways and Fire Tracks] PO 5.1, PO 5.2, PO 5.3</p> <p>Hazards (Bushfire - Outback) Overlay [Vehicle Access - Roads and Driveways] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - Regional) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - Regional) Overlay [Built Form]</p>
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		<p>PO 1.1, PO 1.2</p> <p>Site Contamination PO 1.1</p> <p>Transport, Access and Parking [Movement Systems] PO 1.2, PO 1.4</p> <p>Transport, Access and Parking [Sightlines] PO 2.1, PO 2.2</p> <p>Transport, Access and Parking [Vehicle Access] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5, PO 3.6, PO 3.7, PO 3.8, PO 3.9</p> <p>Transport, Access and Parking [Access for People with Disabilities] PO 4.1</p> <p>Transport, Access and Parking [Vehicle Parking Rates] PO 5.1</p> <p>Transport, Access and Parking [Vehicle Parking Areas] PO 6.1, PO 6.2, PO 6.3, PO 6.4, PO 6.5, PO 6.6</p> <p>Transport, Access and Parking [Undercroft and Below Ground Garaging and Parking of Vehicles] PO 7.1</p> <p>Transport, Access and Parking [Bicycle Parking in Designated Areas] PO 9.1, PO 9.2, PO 9.3</p> <p>Transport, Access and Parking [Corner Cut-Offs] PO 10.1</p>		<p>PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - Regional) Overlay [Vehicle Access -Roads and Driveways] PO 5.1, PO 5.2</p> <p>Hazards (Flooding) Overlay [Flood Resilience] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5</p> <p>Hazards (Flooding) Overlay [Environmental Protection] PO 4.2</p> <p>Hazards (Flooding) Overlay [Site Earthworks] PO 5.1, PO 5.2</p> <p>Hazards (Flooding) Overlay [Access] PO 6.1, PO 6.2</p> <p>Hazards (Flooding – General) Overlay [Flood Resilience] PO 2.1</p> <p>Hazards (Flooding - Evidence Required) Overlay [Flood Resilience] PO 1.1</p> <p>Heritage Adjacency Overlay [Built Form] PO 1.1</p> <p>Historic Area Overlay [All Development] PO 1.1</p> <p>Historic Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Historic Area Overlay [Context and Streetscape Amenity] PO 6.1, PO 6.2</p> <p>Historic Area Overlay [Ruins] PO 8.1</p> <p>Historic Shipwrecks Overlay [General] PO 1.1</p> <p>Interface Management Overlay [Land Use and Intensity] PO 1.1</p> <p>Key Outback and Rural Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Key Outback and Rural Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Key Outback and Rural Routes Overlay [Access - Existing Access Points] PO 3.1</p> <p>Key Outback and Rural Routes Overlay [Access - Location (Spacing)] PO 4.1</p> <p>Key Outback and Rural Routes Overlay [Access -</p>
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				<p>Location (Sight Lines) PO 5.1</p> <p>Key Outback and Rural Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Key Outback and Rural Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Key Outback and Rural Routes Overlay [Public Road Junctions] PO 8.1</p> <p>Key Railway Crossings Overlay [Access, Design and Function] PO 1.1</p> <p>Limited Dwelling Overlay PO 1.1</p> <p>Local Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>Local Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>Local Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Major Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - Existing Access Points] PO 3.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - New Access Points] PO 4.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Major Urban Transport Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Major Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Major Urban Transport Routes Overlay [Public</p>
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				<p>Road Junctions] PO 9.1</p> <p>Major Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Water Quality] PO 1.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Wastewater] PO 2.1, PO 2.2, PO 2.3, PO 2.4</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Stormwater] PO 3.1, PO 3.2, PO 3.3, PO 3.9</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Landscapes and Natural Features] PO 4.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Water Quality] PO 1.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Wastewater] PO 2.1, PO 2.3, PO 2.4, PO 2.5</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Stormwater] PO 3.1, PO 3.2, PO 3.3, PO 3.9</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Landscapes and Natural Features] PO 4.1</p> <p>Native Vegetation Overlay [Environmental Protection] PO 1.1, PO 1.2, PO 1.4</p> <p>Non-Stop Corridors Overlay [Non-Stop Corridor Overlay] PO 1.1</p> <p>Resource Extraction Protection Area Overlay [Protection of Strategic Resources] PO 1.1</p> <p>Scenic Quality Overlay [Land Use and Intensity] PO 1.1</p> <p>Scenic Quality Overlay [Built Form and Character] PO 2.1</p> <p>Scenic Quality Overlay [Landscaping] PO 3.1</p> <p>Scenic Quality Overlay [Earthworks] PO 4.1</p> <p>Significant Interface Management Overlay [Land Use and Intensity]</p>
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				<p>PO 1.1</p> <p>Significant Landscape Protection Overlay [Land Use and Intensity] PO 1.1</p> <p>Significant Landscape Protection Overlay [Built Form and Character] PO 2.1, PO 2.2</p> <p>Significant Landscape Protection Overlay [Landscaping] PO 3.1</p> <p>Significant Landscape Protection Overlay [Earthworks] PO 4.1</p> <p>State Heritage Area Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>State Heritage Area Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Area Overlay [Conservation Works] PO 7.1</p> <p>State Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>State Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>State Significant Native Vegetation Areas Overlay [Environmental Protection] PO 1.1</p> <p>Stormwater Management Overlay PO 1.1</p> <p>Traffic Generating Development Overlay [Traffic Generating Development] PO 1.1, PO 1.2, PO 1.3</p> <p>Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Urban Transport Routes Overlay [Access - (Location Spacing) - Existing Access Point] PO 3.1</p> <p>Urban Transport Routes Overlay [Access - Location (Spacing) - New Access Points] PO 4.1</p>
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				<p>Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Urban Transport Routes Overlay [Access – Mud and Debris] PO 6.1</p> <p>Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Urban Tree Canopy Overlay PO 1.1</p> <p>Water Resources Overlay [Water Catchment] PO 1.1, PO 1.2, PO 1.5, PO 1.6, PO 1.7, PO 1.8</p>
Shop	<p>Land Use and Intensity PO 1.1</p> <p>Built Form and Character PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7</p> <p>Movement, parking and access PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Concept Plans PO 5.1</p>	<p>Clearance from Overhead Powerlines PO 1.1</p> <p>Design in Urban Areas [All Development [External Appearance]] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>Design in Urban Areas [All Development [Safety]] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Design in Urban Areas [All Development [Landscaping]] PO 3.1</p> <p>Design in Urban Areas [All Development [Environmental Performance]] PO 4.1, PO 4.2, PO 4.3</p> <p>Design in Urban Areas [All Development [On-site Waste Treatment Systems]] PO 6.1</p> <p>Design in Urban Areas [All Development [Car parking appearance]] PO 7.1, PO 7.2, PO 7.3, PO 7.4, PO 7.5, PO 7.6, PO 7.7</p> <p>Design in Urban Areas [All Development [Earthworks</p>	<p>Cultural Institutions Subzone [Land Use and Intensity] PO 1.1, PO 1.2</p> <p>Cultural Institutions Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Entertainment Subzone [Land Use and Intensity] PO 1.1, PO 1.3</p> <p>Entertainment Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7, PO 2.8</p> <p>Health Subzone [Land Use and Intensity] PO 1.1, PO 1.2, PO 1.3, PO 1.4</p> <p>Health Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6</p> <p>Innovation Subzone</p>	<p>Airport Building Heights (Aircraft Landing Areas) Overlay [Built Form] PO 1.1</p> <p>Airport Building Heights (Regulated) Overlay [Built Form] PO 1.1</p> <p>Building Near Airfields Overlay PO 1.1, PO 1.2, PO 1.3</p> <p>Character Area Overlay [All Development] PO 1.1</p> <p>Character Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Character Area Overlay [Alterations and Additions] PO 3.1</p> <p>Character Area Overlay [Context and Streetscape Amenity] PO 6.1, PO 6.2</p> <p>Character Preservation District Overlay [Built Form and Character] PO 2.1, PO 2.2, PO 2.3</p> <p>Character Preservation District Overlay [Built Form and Character in the Rural Area] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5, PO 3.6</p> <p>Character Preservation District Overlay [Earthworks] PO 4.1</p> <p>Coastal Areas Overlay [Hazard Risk Minimisation] PO 2.1, PO 2.2, PO 2.3, PO 2.4</p>

		and sloping land]] PO 8.1, PO 8.2, PO 8.3, PO 8.4, PO 8.5	[Land Use and Intensity] PO 1.1, PO 1.2, PO 1.5	Coastal Areas Overlay [Coast Protection Works] PO 3.1, PO 3.2
		Design in Urban Areas [All Development [Overlooking / Visual Privacy (low rise buildings)]] PO 10.1, PO 10.2	Innovation Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5	Coastal Areas Overlay [Environment Protection] PO 4.1, PO 4.2, PO 4.3, PO 4.4, PO 4.5, PO 4.6, PO 4.7
		Design in Urban Areas [All Development [Site Facilities / Waste Storage (excluding low rise residential development)]] PO 11.1, PO 11.2, PO 11.3, PO 11.4, PO 11.5	Innovation Subzone [Building Height] PO 3.1, PO 3.2	Coastal Areas Overlay [Access] PO 5.1, PO 5.2, PO 5.4
		Design in Urban Areas [All Development - Medium and High Rise [External Appearance]] PO 12.1, PO 12.2, PO 12.3, PO 12.4, PO 12.5, PO 12.6, PO 12.7, PO 12.8	Innovation Subzone [Open Space] PO 4.1, PO 4.2, PO 4.3, PO 4.4	Coastal Flooding Overlay PO 1.1
		Design in Urban Areas [All Development - Medium and High Rise [Landscaping]] PO 13.1, PO 13.2, PO 13.3, PO 13.4	Innovation Subzone [Movement and parking] PO 5.1, PO 5.2	Defence Aviation Area Overlay [Built Form] PO 1.1, PO 1.2
		Design in Urban Areas [All Development - Medium and High Rise [Environmental]] PO 14.1, PO 14.2, PO 14.3		Design Overlay [General] PO 1.1
		Design in Urban Areas [All Development - Medium and High Rise [Car Parking]] PO 15.1, PO 15.2		Future Local Road Widening Overlay [Future Road Widening] PO 1.1
		Design in Urban Areas [All Development - Medium and High Rise [Overlooking/Visual Privacy]] PO 16.1		Future Road Widening Overlay [Future Road Widening] PO 1.1
		Design in Urban Areas [All non-residential development [Water Sensitive Design]] PO 42.1, PO 42.2, PO 42.3		Gas and Liquid Petroleum Pipelines Overlay [Land Use and Intensity] PO 1.1
		Design in Urban Areas [All non-residential development [Wash-down and Waste Loading and Unloading]] PO 43.1		Gas and Liquid Petroleum Pipelines (Facilities) Overlay [Safety] PO 1.1
		Design in Urban Areas [Laneway Development [Infrastructure and Access]] PO 44.1		Gateway Overlay [Built Form and Character] PO 1.1, PO 1.2, PO 1.3
		Interface between Land Uses [Hours of Operation] PO 2.1		Gateway Overlay [Landscaping] PO 3.1, PO 3.2, PO 3.3, PO 3.4
				Hazards (Acid Sulfate Soils) Overlay [Land Use and Intensity] PO 1.1
				Hazards (Bushfire - General Risk) Overlay [Siting] PO 1.1
				Hazards (Bushfire - General Risk) Overlay [Built Form] PO 2.1, PO 2.2
				Hazards (Bushfire - General Risk) Overlay [Vehicle Access – Roads, Driveways and Fire Tracks] PO 5.1, PO 5.2, PO 5.3
				Hazards (Bushfire - High Risk) Overlay [Land Use] PO 1.1
				Hazards (Bushfire - High Risk) Overlay [Siting] PO 2.1
				Hazards (Bushfire - High Risk) Overlay [Built Form] PO 3.1, PO 3.2

		Interface between Land Uses [Overshadowing] PO 3.1, PO 3.2, PO 3.3		Hazards (Bushfire - High Risk) Overlay [Vehicle Access –Roads, Driveways and Fire Tracks] PO 6.1, PO 6.2, PO 6.3
		Interface between Land Uses [Activities Generating Noise or Vibration] PO 4.1, PO 4.2, PO 4.5, PO 4.6		Hazards (Bushfire - Medium Risk) Overlay [Siting] PO 1.1
		Interface between Land Uses [Air Quality] PO 5.2		Hazards (Bushfire - Medium Risk) Overlay [Built Form] PO 2.1, PO 2.2
		Interface between Land Uses [Light Spill] PO 6.1		Hazards (Bushfire - Medium Risk) Overlay [Vehicle Access - Roads, Driveways and Fire Tracks] PO 5.1, PO 5.2, PO 5.3
		Interface between Land Uses [Solar Reflectivity / Glare] PO 7.1		Hazards (Bushfire - Outback) Overlay [Vehicle Access - Roads and Driveways] PO 2.1, PO 2.2
		Out of Activity Centre Development PO 1.1, PO 1.2		Hazards (Bushfire - Regional) Overlay [Siting] PO 1.1
		Site Contamination PO 1.1		Hazards (Bushfire - Regional) Overlay [Built Form] PO 2.1, PO 2.2
		Transport, Access and Parking [Movement Systems] PO 1.4		Hazards (Bushfire - Regional) Overlay [Vehicle Access -Roads and Driveways] PO 5.1, PO 5.2, PO 5.3
		Transport, Access and Parking [Sightlines] PO 2.1, PO 2.2		Hazards (Flooding) Overlay [Flood Resilience] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5
		Transport, Access and Parking [Vehicle Access] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5, PO 3.6, PO 3.7, PO 3.8, PO 3.9		Hazards (Flooding) Overlay [Environmental Protection] PO 4.1, PO 4.2
		Transport, Access and Parking [Access for People with Disabilities] PO 4.1		Hazards (Flooding) Overlay [Site Earthworks] PO 5.1, PO 5.2
		Transport, Access and Parking [Vehicle Parking Rates] PO 5.1		Hazards (Flooding) Overlay [Access] PO 6.1, PO 6.2
		Transport, Access and Parking [Vehicle Parking Areas] PO 6.1, PO 6.2, PO 6.3, PO 6.4, PO 6.5, PO 6.6		Hazards (Flooding – General) Overlay [Flood Resilience] PO 2.1
		Transport, Access and Parking [Undercroft and Below Ground Garaging and Parking of Vehicles] PO 7.1		Hazards (Flooding – General) Overlay [Environmental Protection] PO 3.1
				Hazards (Flooding - Evidence Required) Overlay [Flood Resilience] PO 1.1
				Heritage Adjacency Overlay [Built Form] PO 1.1
				Historic Area Overlay [All Development] PO 1.1
				Historic Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5
				Historic Area Overlay [Context and Streetscape Amenity]

		<p>Transport, Access and Parking [Bicycle Parking in Designated Areas] PO 9.1, PO 9.2, PO 9.3</p> <p>Transport, Access and Parking [Corner Cut-Offs] PO 10.1</p>		<p>PO 6.1, PO 6.2</p> <p>Historic Area Overlay [Ruins] PO 8.1</p> <p>Historic Shipwrecks Overlay [General] PO 1.1</p> <p>Key Outback and Rural Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Key Outback and Rural Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Key Outback and Rural Routes Overlay [Access - Existing Access Points] PO 3.1</p> <p>Key Outback and Rural Routes Overlay [Access - Location (Spacing)] PO 4.1</p> <p>Key Outback and Rural Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Key Outback and Rural Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Key Outback and Rural Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Key Outback and Rural Routes Overlay [Public Road Junctions] PO 8.1</p> <p>Key Railway Crossings Overlay [Access, Design and Function] PO 1.1</p> <p>Limited Dwelling Overlay PO 1.1</p> <p>Local Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>Local Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>Local Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Major Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p>
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				<p>Major Urban Transport Routes Overlay [Access – Location (Spacing) - Existing Access Points] PO 3.1</p> <p>Major Urban Transport Routes Overlay [Access – Location (Spacing) – New Access Points] PO 4.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Major Urban Transport Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Major Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Major Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Major Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Water Quality] PO 1.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Wastewater] PO 2.1, PO 2.2, PO 2.3, PO 2.4</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Stormwater] PO 3.1, PO 3.2, PO 3.3, PO 3.9</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 1) Overlay [Landscapes and Natural Features] PO 4.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Water Quality] PO 1.1</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Wastewater] PO 2.1, PO 2.3, PO 2.4, PO 2.5</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Stormwater] PO 3.1, PO 3.2, PO 3.3, PO 3.9</p> <p>Mount Lofty Ranges Water Supply Catchment (Area 2) Overlay [Landscapes and Natural Features] PO 4.1</p> <p>Native Vegetation Overlay [Environmental</p>
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				<p>Protection] PO 1.1, PO 1.2, PO 1.4</p> <p>Non-Stop Corridors Overlay [Non-Stop Corridor Overlay] PO 1.1</p> <p>Resource Extraction Protection Area Overlay [Protection of Strategic Resources] PO 1.1</p> <p>River Murray Flood Plain Protection Area Overlay [Wastewater] PO 1.1</p> <p>River Murray Flood Plain Protection Area Overlay [Built Form and Character] PO 4.1, PO 4.3</p> <p>River Murray Flood Plain Protection Area Overlay [Flood Resilience] PO 5.1, PO 5.2</p> <p>River Murray Flood Plain Protection Area Overlay [Environmental Protection] PO 6.1, PO 6.2, PO 6.3</p> <p>River Murray Flood Plain Protection Area Overlay [Access] PO 7.1, PO 7.2, PO 7.3</p> <p>Scenic Quality Overlay [Land Use and Intensity] PO 1.1</p> <p>Scenic Quality Overlay [Built Form and Character] PO 2.1</p> <p>Scenic Quality Overlay [Landscaping] PO 3.1</p> <p>Scenic Quality Overlay [Earthworks] PO 4.1</p> <p>Significant Interface Management Overlay [Land Use and Intensity] PO 1.1</p> <p>Significant Landscape Protection Overlay [Land Use and Intensity] PO 1.1</p> <p>Significant Landscape Protection Overlay [Built Form and Character] PO 2.1, PO 2.2</p> <p>Significant Landscape Protection Overlay [Landscaping] PO 3.1</p> <p>Significant Landscape Protection Overlay [Earthworks] PO 4.1</p> <p>State Heritage Area Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>State Heritage Area Overlay [Landscape Context</p>
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				<p>and Streetscape Amenity] PO 5.1</p> <p>State Heritage Area Overlay [Conservation Works] PO 7.1</p> <p>State Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>State Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>State Significant Native Vegetation Areas Overlay [Environmental Protection] PO 1.1</p> <p>Traffic Generating Development Overlay [Traffic Generating Development] PO 1.1, PO 1.2, PO 1.3</p> <p>Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Urban Transport Routes Overlay [Access - On- Site Queuing] PO 2.1</p> <p>Urban Transport Routes Overlay [Access - (Location Spacing) - Existing Access Point] PO 3.1</p> <p>Urban Transport Routes Overlay [Access – Location (Spacing) – New Access Points] PO 4.1</p> <p>Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Urban Transport Routes Overlay [Access – Mud and Debris] PO 6.1</p> <p>Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p>
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				Water Resources Overlay [Water Catchment] PO 1.1, PO 1.2, PO 1.5, PO 1.6, PO 1.7, PO 1.8
Tourist accommodation	<p>Land Use and Intensity PO 1.1</p> <p>Built Form and Character PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7</p> <p>Movement, parking and access PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Concept Plans PO 5.1</p>	<p>Clearance from Overhead Powerlines PO 1.1</p> <p>Design in Urban Areas [All Development [External Appearance]] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>Design in Urban Areas [All Development [Safety]] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Design in Urban Areas [All Development [Landscaping]] PO 3.1</p> <p>Design in Urban Areas [All Development [Environmental Performance]] PO 4.1, PO 4.2, PO 4.3</p> <p>Design in Urban Areas [All Development [On-site Waste Treatment Systems]] PO 6.1</p> <p>Design in Urban Areas [All Development [Car parking appearance]] PO 7.1, PO 7.2, PO 7.3, PO 7.4, PO 7.5, PO 7.6, PO 7.7</p> <p>Design in Urban Areas [All Development [Earthworks and sloping land]] PO 8.1, PO 8.2, PO 8.3, PO 8.4, PO 8.5</p> <p>Design in Urban Areas [All Development [Overlooking / Visual Privacy (low rise buildings)]] PO 10.1, PO 10.2</p> <p>Design in Urban Areas [All Development [Site Facilities / Waste Storage (excluding low rise residential development)]] PO 11.1, PO 11.2, PO 11.3, PO 11.4, PO 11.5</p> <p>Design in Urban Areas [All Development - Medium and High Rise [External Appearance]] PO 12.1, PO 12.2, PO 12.3, PO 12.4, PO 12.5, PO 12.6, PO 12.7, PO 12.8</p>	<p>Cultural Institutions Subzone [Land Use and Intensity] PO 1.1, PO 1.2</p> <p>Cultural Institutions Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Entertainment Subzone [Land Use and Intensity] PO 1.1</p> <p>Entertainment Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6, PO 2.7, PO 2.8</p> <p>Health Subzone [Land Use and Intensity] PO 1.1, PO 1.2, PO 1.3, PO 1.4</p> <p>Health Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5, PO 2.6</p> <p>Innovation Subzone [Land Use and Intensity] PO 1.1, PO 1.5</p> <p>Innovation Subzone [Built Form and Character] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Innovation Subzone [Building Height] PO 3.1, PO 3.2</p> <p>Innovation Subzone [Open Space] PO 4.1, PO 4.2, PO 4.3, PO 4.4</p> <p>Innovation Subzone [Movement and parking] PO 5.1, PO 5.2</p>	<p>Aircraft Noise Exposure Overlay [Land Use and Intensity] PO 1.1</p> <p>Airport Building Heights (Aircraft Landing Areas) Overlay [Built Form] PO 1.1</p> <p>Airport Building Heights (Regulated) Overlay [Built Form] PO 1.1</p> <p>Building Near Airfields Overlay PO 1.3</p> <p>Character Area Overlay [All Development] PO 1.1</p> <p>Character Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Character Area Overlay [Context and Streetscape Amenity] PO 6.1, PO 6.2</p> <p>Coastal Areas Overlay [Hazard Risk Minimisation] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Coastal Areas Overlay [Coast Protection Works] PO 3.1, PO 3.2</p> <p>Coastal Areas Overlay [Environment Protection] PO 4.1, PO 4.2, PO 4.3, PO 4.4, PO 4.5, PO 4.6, PO 4.7</p> <p>Coastal Areas Overlay [Access] PO 5.1, PO 5.2, PO 5.4</p> <p>Coastal Flooding Overlay PO 1.1</p> <p>Defence Aviation Area Overlay [Built Form] PO 1.1</p> <p>Design Overlay [General] PO 1.1</p> <p>Future Local Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Future Road Widening Overlay [Future Road Widening] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines Overlay [Land Use and Intensity] PO 1.1</p> <p>Gas and Liquid Petroleum Pipelines (Facilities) Overlay [Safety] PO 1.1</p> <p>Gateway Overlay [Built Form and Character]</p>

		<p>Design in Urban Areas [All Development - Medium and High Rise [Landscaping]] PO 13.1, PO 13.2, PO 13.3, PO 13.4</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Environmental]] PO 14.1, PO 14.2, PO 14.3</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Car Parking]] PO 15.1, PO 15.2</p> <p>Design in Urban Areas [All Development - Medium and High Rise [Overlooking/Visual Privacy]] PO 16.1</p> <p>Design in Urban Areas [All non-residential development [Water Sensitive Design]] PO 42.1, PO 42.2, PO 42.3</p> <p>Design in Urban Areas [All non-residential development [Wash-down and Waste Loading and Unloading]] PO 43.1</p> <p>Design in Urban Areas [Laneway Development [Infrastructure and Access]] PO 44.1</p> <p>Interface between Land Uses [General Land Use Compatibility] PO 1.1</p> <p>Interface between Land Uses [Overshadowing] PO 3.1, PO 3.2, PO 3.3</p> <p>Interface between Land Uses [Activities Generating Noise or Vibration] PO 4.2, PO 4.3, PO 4.4, PO 4.5, PO 4.6</p> <p>Interface between Land Uses [Light Spill] PO 6.1</p> <p>Interface between Land Uses [Solar Reflectivity / Glare] PO 7.1</p> <p>Site Contamination PO 1.1</p> <p>Transport, Access and Parking [Movement]</p>		<p>PO 1.1, PO 1.2, PO 1.3</p> <p>Gateway Overlay [Landscaping] PO 3.1, PO 3.2, PO 3.3, PO 3.4</p> <p>Hazards (Acid Sulfate Soils) Overlay [Land Use and Intensity] PO 1.1</p> <p>Hazards (Bushfire - General Risk) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - General Risk) Overlay [Built Form] PO 2.1, PO 2.2</p> <p>Hazards (Bushfire - General Risk) Overlay [Habitable Buildings] PO 3.1, PO 3.2, PO 3.3</p> <p>Hazards (Bushfire - General Risk) Overlay [Vehicle Access – Roads, Driveways and Fire Tracks] PO 5.2, PO 5.3</p> <p>Hazards (Bushfire - High Risk) Overlay [Land Use] PO 1.1</p> <p>Hazards (Bushfire - High Risk) Overlay [Siting] PO 2.1</p> <p>Hazards (Bushfire - High Risk) Overlay [Built Form] PO 3.1</p> <p>Hazards (Bushfire - High Risk) Overlay [Habitable Buildings] PO 4.1, PO 4.2, PO 4.3</p> <p>Hazards (Bushfire - High Risk) Overlay [Vehicle Access –Roads, Driveways and Fire Tracks] PO 6.2, PO 6.3</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Built Form] PO 2.1</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Habitable Buildings] PO 3.1, PO 3.2, PO 3.3</p> <p>Hazards (Bushfire - Medium Risk) Overlay [Vehicle Access - Roads, Driveways and Fire Tracks] PO 5.2, PO 5.3</p> <p>Hazards (Bushfire - Outback) Overlay [Habitable Buildings] PO 1.1</p> <p>Hazards (Bushfire - Outback) Overlay [Vehicle Access - Roads and Driveways] PO 2.2</p>
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		<p>Systems] PO 1.4</p> <p>Transport, Access and Parking [Sightlines] PO 2.1, PO 2.2</p> <p>Transport, Access and Parking [Vehicle Access] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5, PO 3.6, PO 3.7, PO 3.8, PO 3.9</p> <p>Transport, Access and Parking [Access for People with Disabilities] PO 4.1</p> <p>Transport, Access and Parking [Vehicle Parking Rates] PO 5.1</p> <p>Transport, Access and Parking [Vehicle Parking Areas] PO 6.1, PO 6.2, PO 6.3, PO 6.4, PO 6.5, PO 6.6</p> <p>Transport, Access and Parking [Undercroft and Below Ground Garaging and Parking of Vehicles] PO 7.1</p> <p>Transport, Access and Parking [Bicycle Parking in Designated Areas] PO 9.1, PO 9.2, PO 9.3</p> <p>Transport, Access and Parking [Corner Cut-Offs] PO 10.1</p>		<p>Hazards (Bushfire - Regional) Overlay [Siting] PO 1.1</p> <p>Hazards (Bushfire - Regional) Overlay [Built Form] PO 2.1</p> <p>Hazards (Bushfire - Regional) Overlay [Habitable Buildings] PO 3.1, PO 3.2, PO 3.3</p> <p>Hazards (Bushfire - Regional) Overlay [Vehicle Access -Roads and Driveways] PO 5.2, PO 5.3</p> <p>Hazards (Flooding) Overlay [Flood Resilience] PO 3.1, PO 3.2, PO 3.3, PO 3.4, PO 3.5</p> <p>Hazards (Flooding) Overlay [Environmental Protection] PO 4.2</p> <p>Hazards (Flooding) Overlay [Site Earthworks] PO 5.1, PO 5.2</p> <p>Hazards (Flooding) Overlay [Access] PO 6.1, PO 6.2</p> <p>Hazards (Flooding – General) Overlay [Flood Resilience] PO 2.1</p> <p>Hazards (Flooding - Evidence Required) Overlay [Flood Resilience] PO 1.1</p> <p>Heritage Adjacency Overlay [Built Form] PO 1.1</p> <p>Historic Area Overlay [All Development] PO 1.1</p> <p>Historic Area Overlay [Built Form] PO 2.1, PO 2.2, PO 2.3, PO 2.4, PO 2.5</p> <p>Historic Area Overlay [Context and Streetscape Amenity] PO 6.1, PO 6.2</p> <p>Historic Area Overlay [Ruins] PO 8.1</p> <p>Historic Shipwrecks Overlay [General] PO 1.1</p> <p>Interface Management Overlay [Land Use and Intensity] PO 1.1</p> <p>Key Railway Crossings Overlay [Access, Design and Function] PO 1.1</p> <p>Local Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>Local Heritage Place Overlay [Landscape Context</p>
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				<p>and Streetscape Amenity] PO 5.1</p> <p>Local Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Major Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - Existing Access Points] PO 3.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Spacing) - New Access Points] PO 4.1</p> <p>Major Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Major Urban Transport Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Major Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Major Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Major Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Major Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Non-Stop Corridors Overlay [Non-Stop Corridor Overlay] PO 1.1</p> <p>Resource Extraction Protection Area Overlay [Protection of Strategic Resources] PO 1.1</p> <p>Significant Interface Management Overlay [Land Use and Intensity] PO 1.1</p> <p>State Heritage Area Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5</p> <p>State Heritage Area Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Area Overlay [Conservation Works]</p>
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				<p>PO 7.1</p> <p>State Heritage Place Overlay [Built Form] PO 1.1, PO 1.2, PO 1.3, PO 1.4, PO 1.5, PO 1.6, PO 1.7</p> <p>State Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Place Overlay [Conservation Works] PO 7.1</p> <p>Stormwater Management Overlay PO 1.1</p> <p>Traffic Generating Development Overlay [Traffic Generating Development] PO 1.1, PO 1.2, PO 1.3</p> <p>Urban Transport Routes Overlay [Access - Safe Entry and Exit (Traffic Flow)] PO 1.1</p> <p>Urban Transport Routes Overlay [Access - On-Site Queuing] PO 2.1</p> <p>Urban Transport Routes Overlay [Access - (Location Spacing) - Existing Access Point] PO 3.1</p> <p>Urban Transport Routes Overlay [Access - Location (Spacing) - New Access Points] PO 4.1</p> <p>Urban Transport Routes Overlay [Access - Location (Sight Lines)] PO 5.1</p> <p>Urban Transport Routes Overlay [Access - Mud and Debris] PO 6.1</p> <p>Urban Transport Routes Overlay [Access - Stormwater] PO 7.1</p> <p>Urban Transport Routes Overlay [Building on Road Reserve] PO 8.1</p> <p>Urban Transport Routes Overlay [Public Road Junctions] PO 9.1</p> <p>Urban Transport Routes Overlay [Corner Cut-Offs] PO 10.1</p> <p>Urban Tree Canopy Overlay PO 1.1</p> <p>Water Resources Overlay [Water Catchment] PO 1.1, PO 1.2, PO 1.5, PO 1.6, PO 1.7, PO 1.8</p>
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Tree-damaging activity	None	None	None	<p>Local Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>Regulated and Significant Tree Overlay [Tree Retention and Health] PO 1.1, PO 1.2, PO 1.3, PO 1.4</p> <p>Regulated and Significant Tree Overlay [Ground work affecting trees] PO 2.1</p> <p>Regulated and Significant Tree Overlay [Land Division] PO 3.1</p> <p>State Heritage Area Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p> <p>State Heritage Place Overlay [Landscape Context and Streetscape Amenity] PO 5.1</p>
All other Code Assessed Development	All	All	All	Any relevant Overlay: All

Table 4 – Restricted Development Classification – No change

Table 5 – Procedural Matters (PM) - Notification

The following table identifies, pursuant to section 107(6) of the *Planning, Development and Infrastructure Act 2016*, classes of performance assessed development that are excluded from notification. The table also identifies any exemptions to the placement of notices when notification is required.

Interpretation

A class of development listed in Column A is excluded from notification provided that it does not fall within a corresponding exclusion prescribed in Column B. In instances where development falls within multiple classes within Column A, each clause is to be read independently such that if a development is excluded from notification by any clause, it is, for the purposes of notification excluded irrespective of any other clause.

Class of Development (Column A)	Exceptions (Column B)
1. A kind of development which, in the opinion of the relevant authority, is of a minor nature only and will not unreasonably impact on the owners or occupiers of land in the locality of the site of the development.	None specified.
<u>2. Any kind of development where the site of the development is not adjacent land to a site (or land) used for residential purposes in a neighbourhood-type zone.</u>	<u>Except any of the following:</u> <u>1. the demolition of a State or Local Heritage Place</u> <u>2. the demolition of a building (except an ancillary building) in a Historic Area Overlay.</u>
<u>2.3.</u> Any development involving any of the following (or of any combination of any of the following): (a) advertisement (b) air handling unit, air conditioning system or exhaust fan (c) consulting room (d) demolition (e) fence (f) light industry (including high technology and research based activity) (g) office	Except development that does not satisfy: 1. Health Subzone DTS/DPF 2.1 in areas where the Subzone applies 2. Entertainment Subzone DTS/DPF 2.1 in areas where the Subzone applies 3. Innovation Subzone DTS/DPF 3.1 in areas where the Subzone applies

<ul style="list-style-type: none"> (h) retaining wall (i) shade sail (j) shop (k) solar photovoltaic panels (roof mounted) (l) temporary public service depot (m) water tank. 	<p>4. Cultural Institutions Subzone DTS/DPF 2.4 in areas where the Subzone applies.</p>
<p>3.4. Any development involving any of the following (or of any combination of any of the following):</p> <ul style="list-style-type: none"> (a) internal building works (b) land division (c) tree damaging activity. 	<p>None specified.</p>
<p>4.5. Demolition.</p>	<p>Except any of the following:</p> <ol style="list-style-type: none"> 1. the demolition of a State or Local Heritage Place 2. the demolition of a building (except an ancillary building) in a Historic Area Overlay.
<p>Placement of Notices - Exemptions for Performance Assessed Development</p>	
<p>None specified.</p>	
<p>Placement of Notices - Exemptions for Restricted Development</p>	
<p>None specified.</p>	

Cultural Institutions Subzone

Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	A vibrant cluster of cultural and institution uses including tertiary education, research, viceregal, libraries and museums that attract students, professionals, workers and visitors to the city.
DO 2	Well designed and functional buildings and public spaces that provide pedestrian and cyclist friendly streetscapes and active street frontages that facilitate positive social interaction.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Use and Intensity	
PO 1.1 A diverse range of cultural and institutional uses including tertiary education and associated student accommodation, research, library, viceregal, museums and galleries.	DTS/DPF 1.1 The types of development envisaged within the zone, except: <ul style="list-style-type: none"> (a) Convention centre (b) Entertainment venue (c) Helicopter landing facility (d) Hospital (e) Motel (f) Serviced apartments (g) Tourist accommodation.
PO 1.2 A limited range of secondary activities that are complementary to the primary purpose of the subzone, such as student accommodation, <u>shops</u> , <u>licensed premises</u> , <u>community facilities</u> .	DTS/DPF 1.2 None are applicable.

and research facilities, and avoid other uses.	
Built Form and Character	
<p>PO 2.1</p> <p>Development that emphasises the horizontal grouping of building elements and uses vertical proportions in projections and in the disposition of openings.</p>	<p>DTS/DPF 2.1</p> <p>None are applicable.</p>
<p>PO 2.2</p> <p>Buildings with modelled and textured facades of predominantly masonry appearance similar to the early buildings that contribute to the established historical character of the zone.</p>	<p>DTS/DPF 2.2</p> <p>None are applicable.</p>
<p>PO 2.3</p> <p>Buildings that complement the form, appearance, materials and finishes of existing buildings in the locality, including the predominant:</p> <p>(a) red brick or masonry walls (b) slate, shingles, terra cotta tiles or copper for exposed roofs.</p>	<p>DTS/DPF 2.3</p> <p>None are applicable.</p>
<p>PO 2.4</p> <p>Building heights within the zone transition down to the Adelaide Park Lands from the height of existing buildings established along North Terrace.</p>	<p>DTS/DPF 2.4</p> <p>Buildings located:</p> <p>(a) along road and Adelaide Park Lands frontages not exceeding 3 building levels and 11.5m in building height (b) away from road and Adelaide Park Lands frontages not exceeding 6 building levels and 22m in building height.</p>

<p>PO 2.5</p> <p>Pleasant and interesting lawn and paved landscaped areas that create spaces suitable for a variety of activities ranging from those suitable for group meetings and social activities to those for quiet retreat and relaxation.</p>	<p>DTS/DPF 2.5</p> <p>None are applicable.</p>
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Entertainment Subzone

Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	A prominent, vibrant and safe public plaza that provides a focal point for the Riverbank precinct and is supported by a vibrant mix of land uses that encourage use by city workers, residents, families, students, youth, children and tourists.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Use and Intensity	
PO 1.1 Development of a range of cultural, parliamentary, office, entertainment, retail, conference and ancillary land uses.	DTS/DPF 1.1 None are applicable
PO 1.2 Residential development only where it is demonstrated that noise, light spill and other impacts on residential amenity associated with the envisaged mix of uses and a vibrant public plaza can be adequately addressed.	DTS/DPF 1.2 None are applicable.
<u>PO 1.32</u> <u>A range of health, education and research facilities may also be developed west of Montefiore Road to complement existing and emerging</u>	<u>DTS/DPF 1.32</u> <u>None are applicable.</u>

<u>health-related activities in the adjacent Health Subzone.</u>	
Built Form and Character	
<p>PO 2.1</p> <p>Buildings of a height and scale that references North Terrace, and minimises impacts on the River Torrens.</p>	<p>DTS/DPF 2.1</p> <p>Except where adjacent to the River Torrens, buildings not exceeding 20 building levels and 71m in building height.</p>
<p>PO 2.2</p> <p>Where buildings exceed 20 building levels or 71m in building height they will:</p> <p><u>(a)</u> be of exemplary design,</p> <p><u>(b)</u> not be located adjacent to the River Torrens.</p> <p>(a)(c) and meet the Commonwealth Airports (Protection of Airspace) Regulations.</p>	<p>DTS/DPF 2.2</p> <p>None are applicable.</p>
<p>PO 2.3</p> <p>Buildings adjacent to the River Torrens, <u>east of Montefiore Road</u>, are designed to provide an active edge to the river and are of a low scale commensurate with its landscape setting.</p>	<p>DTS/DPF 2.3</p> <p>None are applicable.</p>
<p>PO 2.4</p> <p>Buildings along King William Road are designed to enable views through to important State Heritage buildings and the public plaza area.</p>	<p>DTS/DPF 2.4</p> <p>None are applicable.</p>
<p>PO 2.5</p> <p>A new public plaza developed on a single plane minimising grade changes across the site so as to maximise pedestrian connectivity.</p>	<p>DTS/DPF 2.5</p> <p>None are applicable.</p>

<p><u>PO 2.6</u></p> <p><u>Development adjacent to the River Torrens, west of Montefiore Road:</u></p> <p><u>(a) provides an active and appealing edge to the river</u></p> <p><u>(b) achieves a high level of amenity</u></p> <p><u>(c) is of high quality design, particularly when viewed from the northern side of the river</u></p> <p><u>(d) maintains an open, safe and connected pedestrian and cycle route along the river's edge</u></p> <p><u>(e) provides a transition in scale down from North Terrace to the river and complements the scale of development on the eastern side of Montefiore Road.</u></p>	<p><u>DTS/DPF 2.6</u></p> <p><u>None are applicable.</u></p>
<p><u>PO 2.7</u></p> <p><u>Development at ground level within the forecourt area containing the 'Yerrakartarta' public artwork (located to the west of the Adelaide Railway Station building) provides connections between North Terrace and the Riverbank.</u></p>	<p><u>DTS/DPF 2.7</u></p> <p><u>None are applicable.</u></p>
<p><u>PO 2.8</u></p> <p><u>Buildings, particularly those that face the River Torrens, incorporate active land uses and design techniques at ground level that contribute to the vitality, safety and activation of the riverbank precinct.</u></p>	<p><u>DTS/DPF 2.8</u></p> <p><u>None are applicable.</u></p>

Health Subzone

Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	A health precinct that creates an identifiable and unified city precinct with strong connections to the Torrens River, North Terrace, the Royal Adelaide Hospital and the city.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Use and Intensity	
PO 1.1 A range of significant health, education and research facilities that support the establishment of a significant health and biomedical precinct.	DTS/DPF 1.1 None are applicable.
<u>PO 1.2</u> <u>Land on the north-western side of the railway line developed primarily with facilities that:</u> <u>(a) support and complement the range of health, education and research facilities envisaged in the balance of Health Subzone</u> <u>(b) enable pedestrian and cycle movement through to the Adelaide Park Lands Zone.</u>	<u>DTS/DPF 1.2</u> <u>None are applicable.</u>
<u>PO 1.3</u>	<u>DTS/DPF 1.3</u> <u>None are applicable.</u>

<p><u>Adaptation and reuse of the Police Barracks:</u></p> <p>(a) <u>supported through a range of additional uses such as community and tourism activities</u></p> <p>(b) <u>in a manner that complements the historic values and park lands setting of the locality.</u></p>	
<p><u>PO 1.4</u></p> <p><u>Adaptation and reuse of the Old Adelaide Gaol and associated buildings:</u></p> <p>(a) <u>supported through a range of additional uses such as community and tourism activities</u></p> <p>(b) <u>in a manner that complements the historic values and park lands setting of the locality.</u></p>	<p><u>DTS/DPF 1.4</u></p> <p><u>None are applicable.</u></p>
<p>Built Form and Character</p>	
<p>PO 2.1</p> <p>Buildings have a positive scale relationship to the North Terrace edge of the Capital City Zone and provide a grand entrance to the city from the west.</p>	<p>DTS/DPF 2.1</p> <p>Buildings fronting North Terrace not exceeding 15 building levels and 53m in building height.</p>
<p>PO 2.2</p> <p>Where buildings exceed 15 building levels or 53m in building height they will be of exemplary design and meet the Commonwealth Airports (Protection of Airspace) Regulations.</p>	<p>DTS/DPF 2.2</p> <p>None are applicable.</p>
<p>PO 2.3</p> <p>Buildings north of the central pathway provide an active edge to the River Torrens and are of a low scale</p>	<p>DTS/DPF 2.3</p> <p>None are applicable.</p>

<p>commensurate with the landscape setting.</p>	
<p>PO 2.4</p> <p>Development provides a satisfactory interface to roads and railways by addressing issues of access, safety, security, noise, air emissions and vibration so that:</p> <p>(a) the effective and efficient operation of the road system and rail service adjacent to the Zone is not detrimentally affected</p> <p>(b) the potential for adverse impacts on hospital occupants and activities as a result of road traffic and the operation of rail services adjacent to the Zone is minimised.</p>	<p>DTS/DPF 2.4</p> <p>None are applicable.</p>
<p>PO 2.5</p> <p>Development sited and designed to enable the continued operation of rail and road services within and adjacent to the Zone.</p>	<p>DTS/DPF 2.5</p> <p>None are applicable.</p>
<p><u>PO 2.6</u></p> <p><u>Building heights on the north-western side of the railway transition down in scale, with lower buildings located towards the Adelaide Park Lands and in a manner that complements the existing heritage features of the adjoining Police Barracks and Old Adelaide Gaol.</u></p>	<p><u>DTS/DPF 2.6</u></p> <p><u>None are applicable.</u></p>

Innovation Subzone

Assessment Provisions (AP)

Desired Outcome (DO)

Desired Outcome	
DO 1	An innovation precinct accommodating a range of commercial, educational and research activities supported by a mix of compatible employment generating land uses including tourism, hospitality, cultural, entertainment and retail activities.
DO 2	A range of low to high rise buildings with high quality contemporary buildings and public spaces within a landscaped setting that responds to heritage buildings on the site and transition down in height and scale towards the Adelaide Park Lands and the Adelaide Botanic Garden.

Performance Outcomes (PO) and Deemed-to-Satisfy (DTS) Criteria / Designated Performance Feature (DPF)

Performance Outcome	Deemed-to-Satisfy Criteria / Designated Performance Feature
Land Use and Intensity	
PO 1.1 Development of innovative commercial, cultural (including museum and art gallery), educational and research activities supported by a mix of compatible employment generating land uses.	DTS/DPF 1.1 None are applicable.
PO 1.2 Small scale retail development to meet the day to day needs of workers and visitors to the precinct.	DTS/DPF 1.2 Shops not exceeding 250m ² total gross leasable floor area.
PO 1.3	DTS/DPF 1.3

<p>A range of small to medium scale services and facilities serving the area such as child care facilities, <u>pre-schools</u>, personal services, entertainment, hospitality and the like.</p>	<p>None are applicable.</p>
<p>PO 1.4 Child care facilities<u>Pre-schools</u>, hotels, licensed premises, personal services establishments and tourism accommodation established as secondary uses on the site of a lesser scale and prominence.</p>	<p>DTS/DPF 1.4 None are applicable.</p>
<p>PO 1.5 Higher impact land uses such as commercial development (including high technology and research based activity) clustered in key nodes where compatible with adjoining uses.</p>	<p>DTS/DPF 1.5 None are applicable.</p>
<p>Built Form and Character</p>	
<p>PO 2.1 A high standard of contemporary architectural design providing an innovative response to the unique context of the area.</p>	<p>DTS/DPF 2.1 None are applicable.</p>
<p>PO 2.2 Development reinforces the grand boulevard character of North Terrace by reflecting the patterns of landscaped spaces and built form, building proportions and scale.</p>	<p>DTS/DPF 2.2 None are applicable.</p>
<p>PO 2.3 Outdoor eating and drinking facilities associated with cafés and restaurants</p>	<p>DTS/DPF 2.3 None are applicable.</p>

<p>on ground floors contribute to the vitality of the Zone.</p>	
<p>PO 2.4 Buildings in proximity to the Adelaide Botanic Garden or Adelaide Park Lands are sited and designed to create view corridors to and from the Botanic Garden.</p>	<p>DTS/DPF 2.4 None are applicable.</p>
<p>PO 2.5 Buildings in proximity to the Adelaide Botanic Garden or Adelaide Park Lands should seek to minimise impacts on plant collections as a result of overshadowing, stormwater runoff, heat, light or wind direction.</p>	<p>DTS/DPF 2.5 None are applicable.</p>
<p>Building Height</p>	
<p>PO 3.1 Buildings of a height and scale that minimise impacts on the Adelaide Botanic Garden and Adelaide Park Lands as well as referencing the scale of buildings facing North Terrace and Frome Road.</p>	<p>DTS/DPF 3.1 Except where located in the Innovation Centre (identified on the Innovation Subzone Concept Plan), buildings not exceeding 15 building levels and 53m in building height.</p>
<p>PO 3.2 Buildings in the Innovation Centre (identified on the <u>Concept Plan 85 - City Riverbank - Innovation, Adelaide</u>Innovation Subzone Concept Plan) only exceed 15 building levels or 53m in building height where: (a) exemplary standards of architectural merit and environmental sustainability are met</p>	<p>DTS/DPF 3.2 None are applicable.</p>

<p>(b) the building positively contributes to the quality and function of the urban fabric of the precinct overall</p> <p>(c) overshadowing impacts on the Adelaide Botanic Garden are minimised</p> <p>(d) and at least four of the following are provided:</p> <ul style="list-style-type: none"> (i) high quality open space that is universally accessible and is directly connected to, and well integrated with, public realm areas of the street (ii) high quality, safe and secure, universally accessible pedestrian linkages that connect through the development site to the surrounding pedestrian network (iii) no on-site car parking (iv) active frontages are located on at least 75 percent of the ground floor street fronts of the building <p>or</p> <ul style="list-style-type: none"> (v) the building is designed to provide measures that provides for a substantial additional gain in sustainability. 	
<p>Open Space</p>	
<p>PO 4.1</p> <p>Open space:</p> <ul style="list-style-type: none"> (a) is coordinated to provide a variety of pleasant, cohesive, hard and soft, high quality landscaped spaces among and adjacent to buildings (b) incorporates planting themes defined by a mix of exotic and 	<p>DTS/DPF 4.1</p> <p>None are applicable.</p>

<p>Australian native plantings, lawns and garden beds.</p>	
<p>PO 4.2</p> <p>Development on the eastern portion of the site (as shown on Innovation Subzone Concept Plan):</p> <ul style="list-style-type: none"> (a) results in an open park like setting complementary to the Adelaide Botanic Garden (b) is carefully managed to sensitively balance its interaction with surrounding uses such as the Adelaide Zoo, Adelaide Botanic Garden and the Adelaide Park Lands (c) minimises uses or activities that would alienate the area from public usage (d) provides opportunities for tourism, education, research, informal recreation and cultural enjoyment (e) improves pedestrian links through the area, and improve the public realm and use and enjoyment of the Adelaide Park Lands (f) provides greater exposure and accessibility for the Adelaide Botanic Garden and North Terrace frontage. 	<p>DTS/DPF 4.2</p> <p>None are applicable.</p>
<p>PO 4.3</p> <p>Boundary treatments with the Adelaide Botanic Garden are of an open and transparent nature with the use of design features, fencing, landscaping treatments that integrate with the open space setting.</p>	<p>DTS/DPF 4.3</p> <p>None are applicable.</p>
<p><u>PO 4.4</u></p> <p><u>Existing open space at the northern end of the Innovation Subzone (as</u></p>	<p><u>DTS/DPF 4.4</u></p> <p><u>None are applicable.</u></p>

<p><u>shown on Innovation Subzone Concept Plan) is maintained to provide:</u></p> <p><u>(a) a pedestrian link between Frome Road and the Adelaide Botanic Gardens</u></p> <p><u>(b) a continuation of the open vista from the Adelaide Botanic Gardens through to the heritage listed Barr Smith Library within the grounds of the Adelaide University.</u></p>	
<p>Movement and parking</p>	
<p>PO 5.1</p> <p>Development incorporates the connection of the Adelaide Park Lands Trail between the Adelaide Park Lands and North Terrace within the area identified as Public Space and Park Lands Trail on the Innovation Subzone Concept Plan, and:</p> <p>(a) provides a safe, welcoming, connected and convenient experience for people walking and cycling</p> <p>(b) supports interaction with the variety of Park Lands landscapes and activities, including a high amenity interface with the Adelaide Botanic Gardens and buildings within the cultural precinct</p> <p>(c) creates a natural Park Lands experience that blends the edge between the site and Botanic Garden</p> <p>(d) minimises the length of the trail adjacent to a public road.</p>	<p>DTS/DPF 5.1</p> <p>None are applicable.</p>
<p>PO 5.2</p> <p>Where parking for multiple cars is provided, it:</p>	<p>DTS/DPF 5.2</p> <p>None are applicable.</p>

<ul style="list-style-type: none"> (a) is not located at ground floor street frontages or detract from the provision of active street frontages (b) minimises the extent of parking that is visible from public areas to that which is required for emergency service vehicles, temporary event parking and set down (drop off) functions (c) incorporates façade treatments where located along major street frontages or interfacing with the Adelaide Park Lands or Botanic Garden, with the built form sufficiently enclosed and detailed to complement neighbouring buildings and screen vehicle parking from view from public areas and other buildings (d) is comprehensively integrated with high quality landscaping that includes large trees (e) is ancillary to an approved or existing use. 	
Advertising	
<p>PO 6.1</p> <p>Advertisements use simple graphics and be restrained in their size, design and colour.</p>	<p>DTS/DPF 6.1</p> <p>None are applicable.</p>
<p>PO 6.2</p> <p>In minor streets and laneways, a greater diversity of type, shape, numbers and design of advertisements are appropriate provided they are of a small-scale and located to present a consistent message band to pedestrians.</p>	<p>DTS/DPF 6.2</p> <p>None are applicable.</p>

Attachment 9 – Copy of submissions received

Copy of AGENCY Submissions Received

Australian Heritage Council Secretariat - Department of Agriculture, Water and the Environment

Australian Government Department of Agriculture, Water and the Environment

Australian Heritage Council Secretariat - Department of Agriculture, Water and the Environment

Good morning

Please find attached correspondence from the Australian Heritage Council Chair and submission for the Proposed Adelaide Park Lands – Riverbank Precinct Code Amendment 2021.

Grateful if you could acknowledge receipt of this email and attachments.

Regards

Australian Heritage Council Secretariat

Department of Agriculture, Water and the Environment

John Gorton Building

King Edward Terrace, Parkes ACT 2600

GPO Box 858, Canberra ACT 2601

The Department acknowledges the traditional owners of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures and to their Elders both past and present.

awe.gov.au

Code Amendment Team
Planning & Land Use Services Division
Attorney General's Department
GPO Box 1815
ADELAIDE SA 5001

Email: plansasubmissions@sa.gov.au

Dear Code Amendment Team

SUBMISSION – PROPOSED ADELAIDE PARK LANDS – RIVERBANK PRECINCT CODE AMENDMENT 2021

I write as the Chair of the Australian Heritage Council on behalf of the full council, and in regard to the above proposed Code Amendment.

This correspondence constitutes a Submission regarding the proposed Adelaide Park Lands – Riverbank Precinct Code Amendment 2021, in response to the Public Consultation Process.
The submission is made on behalf of the Australian Heritage Council.

An acknowledgement of receipt of this submission would be much appreciated.

Yours Faithfully

Ted Baillieu
Chair
Australian Heritage Council
27 October 2021

Encl.

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SUBMISSION – PUBLIC CONSULTATION PROCESS
PROPOSED ADELAIDE PARK LANDS – RIVERBANK PRECINCT CODE AMENDMENT 2021
Australian Heritage Council 26 October 2021

PROCESS BACKGROUND

In March this year the new State-wide Planning and Design Code came into effect in South Australia. It is under the provisions of this Code that the South Australian State Government is now proposing a Code Amendment to increase the City Riverbank Zone by rezoning land from the Adelaide Park Lands Zone.

A Public Consultation process was established to consider that Proposed Code Amendment.

The AHC makes no comment on the Code itself. This submission is as requested on the proposed Code Amendment only.

THE CODE AMENDMENT

‘The Adelaide Park Lands and City Layout’ were included as a Place in the National Heritage List by Gazettal on the 4th of November 2008 under the provisions of the Commonwealth’s *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

A Place on the National Heritage List is protected as a Matter of National Environmental Significance (MNES) under the provisions of the EPBC Act.

The Park Lands are a striking feature of Adelaide's appeal and a seamless joy to behold. Their place in the pantheon of great urban planning legacies has been widely and long appreciated. The Park Lands are not only an extraordinary civic legacy, but an inspirational gift to the future. They also serve as a daily reminder of the power of great vision, of our own blessings and the obligation we too hold, in that same spirit, to pass on that legacy in better shape than we received it.

This proposed Code Amendment will establish a Master Plan for the nominated Precinct which will facilitate developments (in line with the Master Plan) of new designated buildings in the Park Lands Riverbank Precinct. It is clear these new developments will alienate park land within the Heritage Listed Boundaries. The proposed developments provide for a hospital, car park, and entertainment, community, cultural, retail, hospitality and other buildings.

AUSTRALIAN HERITAGE COUNCIL POSITION

The Australian Heritage Council is the principal adviser to the Australian Government on Heritage matters. In regard to the National Heritage list, it is open for the Council to form a view, at any time, as to whether any proposed development is at odds with a National Heritage listing, and the values on which a listing was based.

The AHC has considered the proposal carefully. We have also reviewed in detail a range of material received including from Australia ICOMOS, the South Australian Heritage Council, the Adelaide City Council and others. We attach our submission to the public consultation.

It is the AHC's firm view that the proposed Code Amendment and the development it facilitates would severely compromise the values on which the National Listing is based, be at odds with that listing and, in particular, the facilitated developments would likely trigger a requirement for referral under the EPBC Act.

Accordingly, it is also the AHC's firm recommendation that the Code Amendment be withdrawn and in any reconsideration, the basis for the National Heritage Listing be fully honoured.

It is the further recommendation of the AHC that all levels of Government recommit to our shared, fundamental and perpetual undertaking to protect and enhance the Adelaide Park Lands and City Layout.

HISTORY

We note the origins of the Park Lands have been well documented since first mapped out in 1837 by Colonel Light.

The concept of surrounding the new settlement with unalienated park land was based on sustainable economics, the good health and enjoyment of the population, flood plains and the development of sophisticated urban planning for colonial settlements.

Other settlements across the world also developed ambitious plans for park land reservations.

But few with the precision, integrity, success and durability of Adelaide. Many cities have seen their bold plans fall away.

In Melbourne, then Superintendent (later Governor) Latrobe set aside large tracts for parkland reservation around the central city grid. With that came a vision for a vast ring of parkland in the same vein as Light's in Adelaide but without the formal process. Sadly, by reason of a succession of subsequent Government decisions, Latrobe's vision was slowly eroded. Even in 1932 (now 90 years ago) the Historical Society of Victoria was moved to publish an article in its journal titled: "The Alienation of the Melbourne Parks" by WA Sanderson. That article detailed the long, slow and sad process by which the grand vision was undermined as, slice by slice, Governments found convenient alternative uses for reservations or failed to make reservations in a timely way.

Melbourne still covets wonderful parklands but not that original vision. And only once has any material attempt to reverse that process taken place. In the 1990s land once taken from parkland for the railways was returned to parkland with the establishment of Birrarung Marr. Aside from that, it has been 180 years in the direction of alienation.

Adelaide Park Lands too have suffered incremental losses. But the original vision is substantially intact.

Adelaide remains a standard bearer for the 'Green City' in terms of urban landscape.

LEGISLATION

Two important pieces of contemporary legislation are particularly relevant to the consideration of the proposed Riverbank Precinct Code Amendment 2021.

The Commonwealth's *Environment Protection & Biodiversity Conservation Act 1999* (the EPBC Act) was gazetted in 1999. Amongst other things, that Act provides for National Heritage listing (and therefore protection) of nominated places deemed to have sufficient importance by the Minister on the

recommendation of the Australian Heritage Council. It also provides for agreed Management Plans to be implemented to protect those places.

In 2005 the South Australian Parliament passed the Adelaide Park Lands Act. That Act provides for the protection of the Park Lands and for their management. The Act has a basis in several core principles all of which elevate the importance of protecting and managing the Park in accord with Light's original vision and the public benefit of the people of South Australia and for their use and enjoyment.

The AHC shares the view that the proposed Code Amendment will likely see development of the Park contrary to the spirit and detail of that SA Act and contrary to the intention of the Light vision. However, the AHC will leave that discussion for others.

REPUTATION

The Adelaide Park Lands and City Layout have long enjoyed international status.

The concept as set out in the Light vision has been recognised as world leading. The urban landscape design of other settlements being established in the same era often drew on the Adelaide example.

The fact that the Adelaide Park Lands remain substantially intact and in accord with the Light vision make for continuing local and international regard.

It has been proposed previously that Adelaide be also nominated as an international National Park City to join just a handful of similarly designated Cities worldwide.

It has also been publicly suggested that the Adelaide Park Lands and City Layout be considered for elevation to World Heritage status under the UNESCO banner and by extension protected as a matter of national environmental significance under the EPBC Act. However, that process first, of course, requires the consent of the South Australian Government.

It is without question that the Adelaide Park Lands are viewed in high esteem around Australia and around the world.

But the AHC notes in particular the deep pride in, and affection for the Park Lands held by every resident of Adelaide. And equally the awe of every visitor for whom this extraordinary legacy is so pleasingly obvious. The fierce conviction of the local community to protect that legacy is also much appreciated and well documented.

It is hardly surprising that there has been widespread public interest and concern about the proposed Code Amendment.

INDIGENOUS HERITAGE

The AHC is also concerned to ensure that the voice of Indigenous interests is clearly heard in this matter.

The launch of *Dhawura Ngilan* "Remembering Country" will reinforce the long-held aspirations of Aboriginal and Torres Strait Islander people for their heritage.

In that vision, emphasis is placed on the voices of indigenous communities being clearly heard as a part of working together.

The Light vision for the Adelaide Park Lands is fast approaching its Bicentennial. That in itself is remarkable. But the connection of the Kaurna Nation to the River Torrens and the higher ground above its banks on both the north and south spans millennia.

The AHC strongly supports the vision of *Dhawura Ngilan* and full voice being afforded to the Kaurna.

SIGNIFICANT CONCERNS

Of the City of Churches and its wonderful Park Lands, glorious things are freely spoken across the world. But the provenance of glory rests both with the vision of its creators and the wisdom of its protectors.

There will be those who argue that that this Code Amendment and the development it facilitates is a good thing with noble ends and public benefits. But at what price if the cost is a loss of even greater public good.

The role of National Heritage listing is to guide and counsel the protectors of great vision and public awe.

If every generation affords itself a moment of weakness, if every generation allows itself to trade away its treasures, the time will come when the treasures are no more.

Entropy bears down on weakness. Great vision endures with clarity and strength. Great heritage, both natural and cultural, flourishes with wisdom and purpose.

The Park Lands and City Layout fast approaches a Bicentenary. It will be an extraordinary achievement. Reflections will rightly credit both the creators and the protectors. But in another 200 years, how will the people of Adelaide reflect on this moment, if this moment marks the point at which the consumption, for other purposes, of parkland in Adelaide's once famous Park Lands was legitimised.

The AHC records its significant concerns accordingly.

In regard to the Code Amendment and the proposed facilitated developments we note in particular:

- The loss of parkland to the Park Lands
- The transfer of open space to building sites
- The diminution of the continuity of the encircling parkland
- The further interruption of view corridors
- The undermining of the Light Vision
- The establishment of a damaging precedent
- The prospect of a universally loved community asset becoming a focus of division
- Legitimising processes which implicitly values treasured parkland as a zero-cost asset and available for exploitation
- Devaluing the Park Lands overall
- Lowering the bar of protection standards for the Park Lands
- Eroding the magic of an intergenerational legacy
- Devaluing the story of an Adelaide Hero
- Failing to value the international status of the Park Lands and City Layout
- Generating uncertainty about core community social infrastructure
- Underestimating community aspiration for the Park Lands
- Compromising the enlightened and progressive reputation of SA
- Moving the line on acceptable interventions in the Park Lands

- Giving insufficient voice to indigenous community views
- Undermining a key Adelaide brand
- Placing insufficient priority on National Heritage listing
- Disrespecting the commitment of all those, professionals and volunteers, whose work and passion is the Park Lands, and that of their predecessors
- Shrinking a highly valued community parkland asset without compensation
- Allowing poor management of land to become a precursor to its alienation.

We further note that the integrity of the Park Lands vision has survived 2 World Wars, depressions, recessions, droughts and Governments of all persuasions. And the Park Lands have played a critical role in catering for the good health of the community through two pandemics.

It should not then be beyond the wit of incumbent decision makers to ensure the Park Lands survive the pressure of predictable growth and contemporary fiscal challenge.

NATIONAL HERITAGE LISTING UNDER THE EPBC Act

The gazetting of the inclusion of The Adelaide Parklands and City Plan on the National Heritage list took place in 2008.

In that process the importance of the 'Parklands' was assessed against each of the 9 legislated values associated with National Listing. In the case of 6 of the 9 available criteria, the 'Parklands' were found to have sufficient importance attached to the particular value to more than qualify for listing.

The recommended value assessments accepted by the Minister for the Environment at the time, The Hon Peter Garrett, then became a fundamental part of the citation for the National Heritage listing.

That listing was supported by the South Australian Government and widely by the South Australian Community.

Peter Garrett, the former Federal Minister for Environment, Heritage and the Arts stated, "I had the privilege of adding the Adelaide Park Lands and City Layout to the National Heritage List and these are one of Australia's greatest examples of planning heritage."

It is the City within a continuous belt of Park Lands that makes Adelaide unique amongst Australia's capital cities.

NATIONAL LISTING SUMMARY and VALUES

The Summary and key values, that comprise the basis of the National Heritage listing of The Adelaide Park Lands and City Layout, are set out here together with the respective original citations. NB: Values designated C,E and I were not enlisted 'Values' for the inclusion of the Adelaide Park Lands and City Layout on the National Heritage List.

The AHC has reviewed each of these citations and notes in particular just some aspects (highlighted) of those citations which underscore the importance of the Park Lands and indeed the City Layout, and our concerns about the proposed Code Amendment.

LISTING ASSESSOR'S SUMMARY OF SIGNIFICANCE

The Adelaide Park Lands and City Layout is a significant example of early colonial planning which has retained key elements of its historical layout for over one hundred and seventy years.

The 1837 Adelaide Plan attributed to Colonel William Light and the establishment of Adelaide marks a significant turning point in the settlement of Australia. Prior to this, settlement had been in the form of penal colonies or military outposts where the chief labour supply was convicts.

The Colony of South Australia was conceived as a commercial enterprise based on Edward Gibbon Wakefield's theory of systematic colonisation. It was to be established by free settlers who would make a society that would be 'respectable' and 'self-supporting'.

The Adelaide Plan was the basis for attracting free settlers, offering certainty of land tenure and a high degree of amenity. Being formally laid out prior to settlement, with a grid pattern and wide streets and town squares, the Plan reflected new town planning conventions and contemporary ideas about the provision of common or reserved land for its aesthetic qualities, public health and recreation.

The Plan endures today in the form of the Adelaide Park Lands and City Layout. The key elements of the Plan remain substantially intact, including the layout of the two major city areas, separated by the meandering Torrens River, the encircling Park Lands, the six town squares, the gardens and the grid pattern of major and minor roads.

The Park Lands, in particular, are significant for the longevity of protection and conservation and have high social value to South Australians who regard them as fundamental to the character and ambience of the city of Adelaide.

The national significance of the Adelaide Park Lands and City Layout lies in its design excellence. The Adelaide Plan is regarded as a masterwork of urban design, a grand example of colonial urban planning. The city grid and defining park lands were laid over the shallow river valley with its gentle undulations, described by Light as the Adelaide Plains. The city layout is designed to take full advantage of the topography, an important innovation for the time. The streets were sited and planned to maximise views and vistas through the city and Park Lands and from the city to the Adelaide Hills. The encircling Park Lands provide for health and recreation for the inhabitants while setting the city limits and preventing speculative land sales on the perimeter.

The emphasis on public health, amenity and aesthetic qualities through civic design and provision of public spaces were to have an influence on the Garden City Movement, one of the most significant urban planning initiatives of the twentieth century. Ebenezer Howard, the founder of the Garden City Movement cites the Adelaide Plan as an exemplar in his *Garden Cities of Tomorrow*.

Even before this influence, however, the Adelaide Plan was used as a model for the founding of many towns in Australian and New Zealand. It is regarded by historians and town planners as a major achievement in nineteenth century town planning.

The Adelaide Park Lands and Historic Layout is also significant for its association with Colonel William Light who is credited with the Adelaide Plan and its physical expression in the form of the Adelaide Park Lands and City Layout.

VALUE A – EVENTS, PROCESSES

The place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is the physical expression of the 1837 Adelaide Plan designed and laid out by Colonel William Light. It has endured as a recognisable historical layout for over 170 years retaining the key elements of the plan; encompassing the layout of the two major city areas separated by the Torrens River, the encircling Park Lands, the six town squares, and the grid pattern of major and minor roads. It is substantially intact and reflects Light's design intentions with high integrity.

The Adelaide Park Lands and City Layout is of outstanding importance because it signifies a turning point in the settlement of Australia. It was the first place in Australia to be planned and developed by free settlers, not as a penal settlement or military outpost. The colony of South Australia was established by incorporation as a commercial venture supported by the British Government, based on Edward Wakefield's theory of systematic colonisation. To be commercially successful, there needed to be contained settlement to avoid speculative land sales and this settlement needed to be designed and planned to attract free settlers and to provide them with security of land tenure. The city layout with its grid plan expedited the process of land survey enabling both rapid settlement of land and certainty of title. The wide streets, public squares and generous open spaces provided amenity and the surrounding park lands ensured a defined town boundary while still allowing for public institutional domains. These elements are discernible today.

The Adelaide Park Lands is also significant for the longevity of its protection and conservation. The Adelaide Municipal Corporation Act (1840) established the city council as the 'conservators' of the city and park lands. The establishment of the Park Lands Preservation Society in 1903, along with successive community organisations marks a continuing pattern in community support for safeguarding the significance of the Park Lands for the Adelaide community.

The Adelaide Plan was highly influential as a model for planning other towns in Australia and overseas. It is acknowledged by town planners and historians as a major influence on the Garden City Planning movement, one of the most important urban planning initiatives.

VALUE B – RARITY

The place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth-century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by parklands and is the most extensive and substantially intact nineteenth-century parklands in Australia.

VALUE D – PRINCIPAL CHARACTERISTICS OF A CLASS OF PLACE

The place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of:

- (i) a class of Australia's natural or cultural places;**
- (ii) a class of Australia's natural or cultural environments.**

The Adelaide Park Lands and City Layout is an exemplar of a nineteenth-century planned urban centre. It demonstrates the principal characteristics of a nineteenth century city including a defined boundary, streets in a grid pattern, wide streets, public squares, spacious rectangular blocks and **expansive public open space for commons and public domains**. The expression of these features with their generous open space reflects the early theories and ideas of the Garden City movement of **an urban area set in publicly accessible open space with plantings, gardens, designed areas and open bushland**.

VALUE F – CREATIVE OR TECHNICAL ACHIEVEMENT

The place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.

Adelaide Park Lands and City Layout is regarded throughout Australia and the world as **a masterwork of urban design**. Elements of the Adelaide Plan that contribute to the design excellence are the use of **the encircling park lands to define the boundary of the development of the city** and to provide for health, public access, sport, recreation and public institutional domains, thereby meeting both economic and social requirements. Designing the city layout to respond to the topography was highly innovative for its time with the northern sections of the city located and angled to take advantage of the rising ground while retaining the Torrens River as a feature within the Park Lands.

The judicious siting and wide streets **maximised views and vistas through the city and Park Lands** and from some locations to the Adelaide Hills. The plan features a hierarchy of road widths with a wide dimension to principal routes and terraces and alternating narrow and wide streets in the east-west direction. **Light's planning innovation is supported by substantial historical documentation**. The formal organisation, **delineation and dedication of the Park Lands space was a pioneering technical achievement of William Light in the Adelaide Plan**. The overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas, formal avenues, plantations, gardens, use of specimen trees, botanically important living plant collections particularly at the Adelaide Botanic Garden and the strategic placement of buildings and statuary in their settings.

The creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills. **The civic design of Adelaide was used as a model for founding many other towns in Australia and New Zealand and it is cited in later seminal Garden City planning texts including Garden Cities of Tomorrow by Ebenezer Howard**.

VALUE G – SOCIAL VALUE

The place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

The Adelaide Park Lands has outstanding social value to South Australians who see it as fundamental to the character and ambience of the city. The Park Lands with their recreation areas, sports grounds, gardens and public facilities provide venues for individual and group activities and events, meetings and passive and active recreation. The Park Lands also have significant social value due to the range of important civic, public, and cultural assets and institutions within it.

The present Adelaide Parklands Preservation Society is the latest in a long history of community groups dedicated to protecting the Adelaide Park Lands. These have included the Park Lands Defence Association (1869-87), the Park Lands Preservation League (1903, 1948) and the National Trust of South Australia. The longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands is exceptional.

VALUE H – SIGNIFICANT PEOPLE

The place has outstanding heritage value to the nation because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history.

Colonel William Light is most famously associated with the plan of Adelaide. He bore the ultimate responsibility, as recorded in his surviving publications and letters.

Australian Government Department of Agriculture, Water and the Environment



Australian Government
**Department of Agriculture,
Water and the Environment**

Ms Caroline Mealor
Chief Executive
Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
ADELAIDE SA 5001

Dear Ms Mealor

Consultation on the Riverbank Precinct Code Amendment, Adelaide, SA

Thank you for providing advance notice of the planning changes for Adelaide's Riverbank Precinct and for inviting comment from the Department of Agriculture, Water and the Environment (the Department) on these changes.

As you may be aware, the Department is Australian Government authority that administers the Commonwealth's central piece of environmental legislation, the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). You may appreciate that the proposed changes to planning policy and zoning sections in the Riverbank Precinct may be followed by development proposals that could interact with or impact on matters of national environmental significance that are protected under the EPBC Act.

Under the EPBC Act, actions that have, or are likely to have, a significant impact on nationally protected matters—such as nationally and internationally important flora, fauna, ecological communities and heritage places—require approval from the Australian Government Minister for the Environment.

The Department notes that a number of matters protected under the EPBC Act potentially occur in the area of the Riverbank Precinct. A compilation of potentially these protected matters is provided in the Protected Matters Search Tool (PMST) report, enclosed with this letter. This report is for information purposes only as it is based on the limited information available to the Department. It may not reflect the true extent of protected matters that may be impacted by any proposed action. You may wish to run your own protected matters search on the Department's website at <http://www.environment.gov.au/epbc/protected-matters-search-tool>.

The Department encourages any person proposing to take an action that is likely to have a significant impact on a matter of national environmental significance must refer their proposal for assessment under the EPBC Act. Guidelines for determining whether the impact of an action is likely to be significant are available from the Department's website at <http://www.environment.gov.au/epbc/policy-statements>. These guidelines are designed to help decide whether a referral under the EPBC Act is required.

Please note that not all actions affecting matters protected by the EPBC Act will have a significant impact, and may not require approval. If the question of significance is unclear, a proponent may wish to arrange a pre-referral meeting to discuss whether the action should be referred. Further information is available at <http://www.environment.gov.au/epbc/publications/pre-referral-meeting-guidance>.

Instructions for submitting a referral through the Department's online services, together with further information on the EPBC Act, is available on the Department's website at <http://www.environment.gov.au/protection/environment-assessments/assessment-and-approval-process>. More information about referrals can also be obtained via email epbc.referrals@awe.gov.au or phone 02 6274 2496.

If you have any questions about this letter or the EPBC assessment process, please email the SA/NT Assessments Section at EADSAandNTSection@environment.gov.au or call Dr Leo Pure (EPBC Senior Assessment Officer) on [REDACTED]

I hope the information provided is of assistance.

Yours sincerely



Tanya Stacpoole
Director, SA/NT Assessments Section
Environment Approvals Division
[REDACTED]

18 October 2021

Enclosed Protected Matters Search report:23/09/2021



EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected.

Information on the coverage of this report and qualifications on data supporting this report are contained in the caveat at the end of the report.

Information is available about [Environment Assessments](#) and the EPBC Act including significance guidelines, forms and application process details.

Report created: 23/09/21 17:08:15

[Summary](#)

[Details](#)

[Matters of NES](#)

[Other Matters Protected by the EPBC Act](#)

[Extra Information](#)

[Caveat](#)

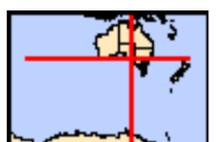
[Acknowledgements](#)



This map may contain data which are
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[Coordinates](#)

Buffer: 0.0Km



Summary

Matters of National Environmental Significance

This part of the report summarises the matters of national environmental significance that may occur in, or may relate to, the area you nominated. Further information is available in the detail part of the report, which can be accessed by scrolling or following the links below. If you are proposing to undertake an activity that may have a significant impact on one or more matters of national environmental significance then you should consider the [Administrative Guidelines on Significance](#).

World Heritage Properties:	None
National Heritage Places:	1
Wetlands of International Importance:	None
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	None
Listed Threatened Ecological Communities:	1
Listed Threatened Species:	15
Listed Migratory Species:	14

Other Matters Protected by the EPBC Act

This part of the report summarises other matters protected under the Act that may relate to the area you nominated. Approval may be required for a proposed activity that significantly affects the environment on Commonwealth land, when the action is outside the Commonwealth land, or the environment anywhere when the action is taken on Commonwealth land. Approval may also be required for the Commonwealth or Commonwealth agencies proposing to take an action that is likely to have a significant impact on the environment anywhere.

The EPBC Act protects the environment on Commonwealth land, the environment from the actions taken on Commonwealth land, and the environment from actions taken by Commonwealth agencies. As heritage values of a place are part of the 'environment', these aspects of the EPBC Act protect the Commonwealth Heritage values of a Commonwealth Heritage place. Information on the new heritage laws can be found at <http://www.environment.gov.au/heritage>

A [permit](#) may be required for activities in or on a Commonwealth area that may affect a member of a listed threatened species or ecological community, a member of a listed migratory species, whales and other cetaceans, or a member of a listed marine species.

Commonwealth Land:	2
Commonwealth Heritage Places:	None
Listed Marine Species:	20
Whales and Other Cetaceans:	None
Critical Habitats:	None
Commonwealth Reserves Terrestrial:	None
Australian Marine Parks:	None

Extra Information

This part of the report provides information that may also be relevant to the area you have nominated.

State and Territory Reserves:	None
Regional Forest Agreements:	None
Invasive Species:	45
Nationally Important Wetlands:	None
Key Ecological Features (Marine)	None

Details

Matters of National Environmental Significance

National Heritage Properties		[Resource Information]
Name	State	Status
Historic		
The Adelaide Park Lands and City Layout	SA	Listed place

Listed Threatened Ecological Communities

[Resource Information]

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Name	Status	Type of Presence
Grey Box (<i>Eucalyptus microcarpa</i>) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia	Endangered	Community may occur within area

Listed Threatened Species

[Resource Information]

Name	Status	Type of Presence
Birds		
Botaurus poiciloptilus Australasian Bittern [1001]	Endangered	Species or species habitat likely to occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
Falco hypoleucos Grey Falcon [929]	Vulnerable	Species or species habitat likely to occur within area
Grantiella picta Painted Honeyeater [470]	Vulnerable	Species or species habitat likely to occur within area
Hirundapus caudacutus White-throated Needletail [682]	Vulnerable	Species or species habitat known to occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat may occur within area
Pedionomus torquatus Plains-wanderer [906]	Critically Endangered	Species or species habitat may occur within area
Rostratula australis Australian Painted Snipe [77037]	Endangered	Species or species habitat likely to occur within area
Sternula nereis nereis Australian Fairy Tern [82950]	Vulnerable	Species or species

Name	Status	Type of Presence
Thinornis cucullatus cucullatus Eastern Hooded Plover, Eastern Hooded Plover [90381]	Vulnerable	habitat may occur within area Species or species habitat may occur within area
Mammals		
Pteropus poliocephalus Grey-headed Flying-fox [186]	Vulnerable	Roosting known to occur within area
Plants		
Caladenia tensa Greencomb Spider-orchid, Rigid Spider-orchid [24390]	Endangered	Species or species habitat likely to occur within area
Prasophyllum pallidum Pale Leek-orchid [20351]	Vulnerable	Species or species habitat may occur within area
Senecio macrocarpus Large-fruit Fireweed, Large-fruit Groundsel [16333]	Vulnerable	Species or species habitat may occur within area
Listed Migratory Species		[Resource Information]
* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.		
Name	Threatened	Type of Presence
Migratory Marine Birds		
Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area
Migratory Terrestrial Species		
Hirundapus caudacutus White-throated Needletail [682]	Vulnerable	Species or species habitat known to occur within area
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Motacilla flava Yellow Wagtail [644]		Species or species habitat may occur within area
Myiagra cyanoleuca Satin Flycatcher [612]		Species or species habitat may occur within area
Migratory Wetlands Species		
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat may occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat may occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area
Gallinago hardwickii Latham's Snipe, Japanese Snipe [863]		Species or species

Name	Threatened	Type of Presence
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	habitat likely to occur within area Species or species habitat may occur within area
Pandion haliaetus Osprey [952]		Species or species habitat may occur within area
Tringa nebularia Common Greenshank, Greenshank [832]		Species or species habitat likely to occur within area

Other Matters Protected by the EPBC Act

Commonwealth Land [\[Resource Information \]](#)

The Commonwealth area listed below may indicate the presence of Commonwealth land in this vicinity. Due to the unreliability of the data source, all proposals should be checked as to whether it impacts on a Commonwealth area, before making a definitive decision. Contact the State or Territory government land department for further information.

Name
Commonwealth Land - Commonwealth Land - Australian National Railways Commission

Listed Marine Species [\[Resource Information \]](#)

* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.

Name	Threatened	Type of Presence
Birds		
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat may occur within area
Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area
Ardea ibis Cattle Egret [59542]		Species or species habitat may occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat may occur within area
Calidris canutus Red Knot, Knot [855]	Endangered	Species or species habitat may occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area
Chrysococcyx osculans Black-eared Cuckoo [705]		Species or species habitat known to occur within area
Gallinago hardwickii Latham's Snipe, Japanese Snipe [863]		Species or species

Name	Threatened	Type of Presence
Haliaeetus leucogaster White-bellied Sea-Eagle [943]		habitat likely to occur within area Species or species habitat known to occur within area
Hirundapus caudacutus White-throated Needletail [682]	Vulnerable	Species or species habitat known to occur within area
Merops ornatus Rainbow Bee-eater [670]		Species or species habitat may occur within area
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Motacilla flava Yellow Wagtail [644]		Species or species habitat may occur within area
Myiagra cyanoleuca Satin Flycatcher [612]		Species or species habitat may occur within area
Numenius madagascariensis Eastern Curlew, Far Eastern Curlew [847]	Critically Endangered	Species or species habitat may occur within area
Pandion haliaetus Osprey [952]		Species or species habitat may occur within area
Rostratula benghalensis (sensu lato) Painted Snipe [889]	Endangered*	Species or species habitat likely to occur within area
Thinornis rubricollis rubricollis Hooded Plover (eastern) [66726]	Vulnerable*	Species or species habitat may occur within area
Tringa nebularia Common Greenshank, Greenshank [832]		Species or species habitat likely to occur within area

Extra Information

Invasive Species [\[Resource Information \]](#)

Weeds reported here are the 20 species of national significance (WoNS), along with other introduced plants that are considered by the States and Territories to pose a particularly significant threat to biodiversity. The following feral animals are reported: Goat, Red Fox, Cat, Rabbit, Pig, Water Buffalo and Cane Toad. Maps from Landscape Health Project, National Land and Water Resources Audit, 2001.

Name	Status	Type of Presence
Birds		
Acridotheres tristis Common Myna, Indian Myna [387]		Species or species habitat likely to occur

Name	Status	Type of Presence within area
Alauda arvensis Skylark [656]		Species or species habitat likely to occur within area
Anas platyrhynchos Mallard [974]		Species or species habitat likely to occur within area
Carduelis carduelis European Goldfinch [403]		Species or species habitat likely to occur within area
Carduelis chloris European Greenfinch [404]		Species or species habitat likely to occur within area
Columba livia Rock Pigeon, Rock Dove, Domestic Pigeon [803]		Species or species habitat likely to occur within area
Passer domesticus House Sparrow [405]		Species or species habitat likely to occur within area
Pycnonotus jocosus Red-whiskered Bulbul [631]		Species or species habitat likely to occur within area
Streptopelia chinensis Spotted Turtle-Dove [780]		Species or species habitat likely to occur within area
Sturnus vulgaris Common Starling [389]		Species or species habitat likely to occur within area
Turdus merula Common Blackbird, Eurasian Blackbird [596]		Species or species habitat likely to occur within area
Mammals		
Bos taurus Domestic Cattle [16]		Species or species habitat likely to occur within area
Canis lupus familiaris Domestic Dog [82654]		Species or species habitat likely to occur within area
Capra hircus Goat [2]		Species or species habitat likely to occur within area
Felis catus Cat, House Cat, Domestic Cat [19]		Species or species habitat likely to occur within area
Lepus capensis Brown Hare [127]		Species or species habitat likely to occur within area
Mus musculus House Mouse [120]		Species or species habitat likely to occur within area
Oryctolagus cuniculus Rabbit, European Rabbit [128]		Species or species habitat likely to occur within area
Rattus norvegicus Brown Rat, Norway Rat [83]		Species or species habitat likely to occur

Name	Status	Type of Presence
Rattus rattus Black Rat, Ship Rat [84]		within area Species or species habitat likely to occur within area
Sus scrofa Pig [6]		Species or species habitat likely to occur within area
Vulpes vulpes Red Fox, Fox [18]		Species or species habitat likely to occur within area
Plants		
Anredera cordifolia Madeira Vine, Jalap, Lamb's-tail, Mignonette Vine, Anredera, Gulf Madeiravine, Heartleaf Madeiravine, Potato Vine [2643]		Species or species habitat likely to occur within area
Asparagus aethiopicus Asparagus Fern, Ground Asparagus, Basket Fern, Sprengi's Fern, Bushy Asparagus, Emerald Asparagus [62425]		Species or species habitat likely to occur within area
Asparagus asparagoides Bridal Creeper, Bridal Veil Creeper, Smilax, Florist's Smilax, Smilax Asparagus [22473]		Species or species habitat likely to occur within area
Asparagus plumosus Climbing Asparagus-fern [48993]		Species or species habitat likely to occur within area
Asparagus scandens Asparagus Fern, Climbing Asparagus Fern [23255]		Species or species habitat likely to occur within area
Chrysanthemoides monilifera Bitou Bush, Boneseed [18983]		Species or species habitat likely to occur within area
Chrysanthemoides monilifera subsp. monilifera Boneseed [16905]		Species or species habitat likely to occur within area
Cylindropuntia spp. Prickly Pears [85131]		Species or species habitat likely to occur within area
Cytisus scoparius Broom, English Broom, Scotch Broom, Common Broom, Scottish Broom, Spanish Broom [5934]		Species or species habitat likely to occur within area
Genista linifolia Flax-leaved Broom, Mediterranean Broom, Flax Broom [2800]		Species or species habitat likely to occur within area
Genista monspessulana Montpellier Broom, Cape Broom, Canary Broom, Common Broom, French Broom, Soft Broom [20126]		Species or species habitat likely to occur within area
Genista sp. X Genista monspessulana Broom [67538]		Species or species habitat likely to occur within area
Lantana camara Lantana, Common Lantana, Kamara Lantana, Large-leaf Lantana, Pink Flowered Lantana, Red Flowered Lantana, Red-Flowered Sage, White Sage, Wild Sage [10892]		Species or species habitat may occur within area
Lycium ferocissimum African Boxthorn, Boxthorn [19235]		Species or species habitat likely to occur within area
Nassella neesiana Chilean Needle grass [67699]		Species or species

Name	Status	Type of Presence
<p>Olea europaea Olive, Common Olive [9160]</p>		<p>habitat likely to occur within area</p>
<p>Opuntia spp. Prickly Pears [82753]</p>		<p>Species or species habitat likely to occur within area</p>
<p>Pinus radiata Radiata Pine Monterey Pine, Insignis Pine, Wilding Pine [20780]</p>		<p>Species or species habitat likely to occur within area</p>
<p>Rubus fruticosus aggregate Blackberry, European Blackberry [68406]</p>		<p>Species or species habitat likely to occur within area</p>
<p>Salix spp. except S.babylonica, S.x calodendron & S.x reichardtii Willows except Weeping Willow, Pussy Willow and Sterile Pussy Willow [68497]</p>		<p>Species or species habitat likely to occur within area</p>
<p>Solanum elaeagnifolium Silver Nightshade, Silver-leaved Nightshade, White Horse Nettle, Silver-leaf Nightshade, Tomato Weed, White Nightshade, Bull-nettle, Prairie-berry, Satansbos, Silver-leaf Bitter-apple, Silverleaf-nettle, Trompillo [12323]</p>		<p>Species or species habitat likely to occur within area</p>
<p>Tamarix aphylla Athel Pine, Athel Tree, Tamarisk, Athel Tamarisk, Athel Tamarix, Desert Tamarisk, Flowering Cypress, Salt Cedar [16018]</p>		<p>Species or species habitat likely to occur within area</p>
<p>Ulex europaeus Gorse, Furze [7693]</p>		<p>Species or species habitat likely to occur within area</p>

Caveat

The information presented in this report has been provided by a range of data sources as acknowledged at the end of the report.

This report is designed to assist in identifying the locations of places which may be relevant in determining obligations under the Environment Protection and Biodiversity Conservation Act 1999. It holds mapped locations of World and National Heritage properties, Wetlands of International and National Importance, Commonwealth and State/Territory reserves, listed threatened, migratory and marine species and listed threatened ecological communities. Mapping of Commonwealth land is not complete at this stage. Maps have been collated from a range of sources at various resolutions.

Not all species listed under the EPBC Act have been mapped (see below) and therefore a report is a general guide only. Where available data supports mapping, the type of presence that can be determined from the data is indicated in general terms. People using this information in making a referral may need to consider the qualifications below and may need to seek and consider other information sources.

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Threatened, migratory and marine species distributions have been derived through a variety of methods. Where distributions are well known and if time permits, maps are derived using either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc) together with point locations and described habitat; or environmental modelling (MAXENT or BIOCLIM habitat modelling) using point locations and environmental data layers.

Where very little information is available for species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc). In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More reliable distribution mapping methods are used to update these distributions as time permits.

Only selected species covered by the following provisions of the EPBC Act have been mapped:

- migratory and
- marine

The following species and ecological communities have not been mapped and do not appear in reports produced from this database:

- threatened species listed as extinct or considered as vagrants
- some species and ecological communities that have only recently been listed
- some terrestrial species that overfly the Commonwealth marine area
- migratory species that are very widespread, vagrant, or only occur in small numbers

The following groups have been mapped, but may not cover the complete distribution of the species:

- non-threatened seabirds which have only been mapped for recorded breeding sites
- seals which have only been mapped for breeding sites near the Australian continent

Such breeding sites may be important for the protection of the Commonwealth Marine environment.

Coordinates

-34.919124 138.580324,-34.914949 138.584244,-34.916403 138.585331,-34.917646 138.592912,-34.915887 138.598663,-34.91645 138.60141,-
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Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

- [-Office of Environment and Heritage, New South Wales](#)
- [-Department of Environment and Primary Industries, Victoria](#)
- [-Department of Primary Industries, Parks, Water and Environment, Tasmania](#)
- [-Department of Environment, Water and Natural Resources, South Australia](#)
- [-Department of Land and Resource Management, Northern Territory](#)
- [-Department of Environmental and Heritage Protection, Queensland](#)
- [-Department of Parks and Wildlife, Western Australia](#)
- [-Environment and Planning Directorate, ACT](#)
- [-Birdlife Australia](#)
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- [-State Herbarium of South Australia](#)
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- [-Australian National Herbarium, Canberra](#)
- [-University of New England](#)
- [-Ocean Biogeographic Information System](#)
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- [-Geoscience Australia](#)
- [-CSIRO](#)
- [-Australian Tropical Herbarium, Cairns](#)
- [-eBird Australia](#)
- [-Australian Government – Australian Antarctic Data Centre](#)
- [-Museum and Art Gallery of the Northern Territory](#)
- [-Australian Government National Environmental Science Program](#)
- [-Australian Institute of Marine Science](#)
- [-Reef Life Survey Australia](#)
- [-American Museum of Natural History](#)
- [-Queen Victoria Museum and Art Gallery, Inveresk, Tasmania](#)
- [-Tasmanian Museum and Art Gallery, Hobart, Tasmania](#)
- [-Other groups and individuals](#)

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

Please feel free to provide feedback via the [Contact Us](#) page.

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Department of Agriculture Water and the Environment

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Copy of COUNCIL Submissions Received

Sandy Vershoor (Presiding Member, Adelaide Park lands Authority)

Adelaide City Council

Sandy Vershoor (Presiding Member, Adelaide Park lands Authority)

Dear PlanSA

Please find attached the advice of the Adelaide Park Lands Authority on the Riverbank Precinct Code Amendment.

Should you have any questions, please contact me as below.

Kind regards

Maddie

Maddie [REDACTED]
Team Leader – City Policy

Kaurna Country
Colonel Light Centre

2nd Floor, 25 Pirie Street, Adelaide, South Australia, 5000

P | [REDACTED]

E | [REDACTED]



The Honourable Steven Marshall MP
Premier of South Australia
GPO Box 2343
ADELAIDE SA 5001

Via email: premier@sa.gov.au

Dear Premier

I write in my capacity as Presiding Member of the Board of the Adelaide Park Lands Authority (the Board). The Board has met on a number of occasions to discuss the proposed Riverbank Precinct Code Amendment which impacts the Adelaide Park Lands and undertaken a field trip to investigate the site more closely.

At its meeting on 14 October 2021, the Board finalized its comments on the Riverbank Precinct Code Amendment and requested that I write to you to outline the Board's advice on this matter.

APLA's Submission on Riverbank Precinct Code Amendment

The Riverbank Precinct lies at the heart of the Adelaide Park Lands, as defined by the *Adelaide Park Lands Act 2005* (the Act).

The Act was developed in the early 2000s at a time when the Adelaide Park Lands were under threat from development, most notably in the form of the National Wine Centre and Next Generation fitness centre. The purpose of the Act was to "*establish a legislative framework that promotes the special status, attributes and character of the Adelaide Park Lands; to provide for the protection of those park lands and for their management as a world-class asset to be preserved as an urban park for the benefit of present and future generations*".

Importantly, the Act contains seven statutory principles, which, in summary, state that the Adelaide Park Lands should:

- Correspond with the general intention of Colonel William Light's first Plan of Adelaide in 1837
- Be held for the public benefit of the people of South Australia, and be available for their use and enjoyment
- Reflect and support a diverse range of environmental, cultural, recreational and social values and activities
- Provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City

- Contribute to the natural heritage and improve the biodiversity and sustainability of the Adelaide Plains
- Be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government
- Reflect the interests of the South Australian community in maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

Subsequent to the establishment of the Act, in 2008 the Adelaide Park Lands and City Layout was included on Australia's National Heritage List, which states:

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth century park lands in Australia.

The inclusion on the National Heritage List, as "a masterwork of urban design", confirmed the importance of the Park Lands to Adelaide's identity and to the Nation's heritage. It was included for many reasons, including that the Park Lands and City Plan is "substantially intact and reflects Light's design intentions with high integrity". In the Board's view, the wholesale changes which could be brought about through the ambitious provisions of the Riverbank Precinct Code Amendment would seriously undermine the integrity of the Park Lands and further enable the commodification of our public land. For this reason it is recommended the State Government undertake a strategic assessment under the *Environment Protection and Biodiversity Conservation Act 1999* prior to progressing the policy changes to ensure the policy directions are consistent with the heritage values of the National Heritage Place.

APLA has also been instrumental in informing and supporting State Government's State Heritage Tourism Strategy "Growing our Heritage Future" and Council's endorsed "Heritage: Our Future - Heritage Strategy 2021-2036 and Action Plan" which **both seek World Heritage Listing for the Adelaide Park Lands and City Layout**. The Draft Code Amendment may jeopardize this strategically important goal.

Over the last 184 years, that stretch of the Adelaide Park Lands between North Terrace and River Torrens / Karrowirra Pari, some 166ha, has been subject to continuous built form encroachments. Over 71ha, or 42%, of that space has been lost to various institutions, venues, hotels, hospital and car parks.

The remaining tenuous strips of green Park Lands between the ever-encroaching built form and River Torrens / Karrawirra Pari need enhancing as open recreational space, to maintain the green connections to and along the River. Colonel Light is often quoted as saying that one of the primary reasons he located Adelaide where he did was because of the superior connections with River Torrens / Karrawirra Pari. Let us not lose those critical green connections.

Under the Act and Adelaide Park Lands Management Strategy (which was adopted by Council and the State Government in 2017) it is incumbent on the Board, Council and State Government to prevent the erosion of open space and to protect and nurture the Park Lands.

The current Planning and Design Code, Adelaide Park Lands Zone provides Desired Outcomes which seek:

- A unique **publicly accessible and well connected open space system**, including the formal city squares, that creates a distinctive landscaped park setting for the City of Adelaide.
- A range of **passive and active recreational activities with a high-level of amenity**, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of temporary events, such as festivals, concerts and sporting events.

Rezoning land within the Adelaide Park Lands Zone will remove these key Desired Outcomes of the Park Lands and instead replace them with Desired Outcomes which envisages built form. Whilst the Desired Outcomes of the proposed City Riverbank Zone recognise connections with the Adelaide Park Lands, **it is the opportunity for increased built form on the Adelaide Park Lands that the Board does not support.**

The Riverbank Precinct Code Amendment clearly envisages more built form and further loss of open space. The removal of land from the Adelaide Park Lands Zone in the Riverbank Precinct Code Amendment sets up a planning framework that could lead to development which is inconsistent with Park Lands values. This could include an increase in buildings, particularly the scale of such buildings, less emphasis on open space and less emphasis on public use which, in turn, will lead to the alienation of public land. It is difficult to understand the State Government's vision for the Riverbank Precinct without a current Master Plan. The Board urges the State Government and the City of Adelaide to engage, finalise and release a current master plan for the entire Riverbank precinct. This process should occur prior to any planning policy changes being implemented.

Riverbank Subzone

The Riverbank Precinct Code Amendment proposes to create a new Riverbank Subzone over the River Torrens and the north and south banks of the Adelaide Park Lands. The Board does not support this proposal for a number of reasons.

In relation to existing uses, the CoA already leases a number of buildings, either former boat sheds converted to cafes or restaurants or still being used as boat sheds. Those buildings, or buildings within those locations date back a hundred years. In addition to the historic built form in this precinct, Council facilitates many large and small events are held in Elder Park, Pinky Flat, Barr Smith Walk and elsewhere each year, making the Riverbank an already well activated site. All this, and more, can occur under the existing planning provisions.

Further, it is well understood that the River Torrens / Karrawirra Pari is of great significance to Kaurna, particularly Pinky Flat and the adjacent Adelaide Oval area which, together, formed an important camp site and corroboree ground. For this reason, the northern banks of the River Torrens should be respected and left free from permanent built form.

Health Subzone

The Board does not oppose the location for the new Women's and Children's Hospital. However, the Riverbank Precinct Code Amendment's proposed Health Subzone extension on to Kate Cocks Park (Park 27) allows for a commercial car park to be built in association with the new Women's and Children's Hospital and potentially other commercial buildings, to a possible height of 15 building levels. This area is the remaining open Park Lands space between the State Heritage sites of the Adelaide Gaol and the Police Barracks. Kate Cocks Park is first and foremost part of the Adelaide Park Lands. The additional built form that the Riverbank Precinct Code Amendment would allow, of such a scale is at odds with the spirit and provisions of both the statutory principles in the Act and the Adelaide Park Lands Management Strategy. For these reasons the Board does not support any additional built form on Kate Cocks Park. The State Government should consider alternative locations and design options to provide car parking to the proposed new Women's and Children's Hospital that does not include another incremental loss of the Adelaide Park Lands. There needs to be a vision for the health precinct that includes protecting the valuable green space that is the Park Lands and linking the precinct back to the city.

The Board urges the State Government to work with the City of Adelaide to implement the vision of the Adelaide Park Lands Management Strategy for Kate Cocks Park (Park 27) and transform this space into a beautiful park setting to complement the historic Gaol and area, incorporating well-designed cycling and pedestrian access to the River Torrens/Karrawirra Pari.

Entertainment Subzone

The Riverbank Precinct Code Amendment's Entertainment Subzone extension on to Helen Mayo Park (Park 27) allows for an entertainment arena, residential,

commercial and health developments. Helen Mayo Park (Park 27) is a slim stretch of green Park Lands re-created out of dis-used rail land. The proposed Entertainment Subzone provides a height guidance of 20 building levels, providing a transition down in scale toward the river, however no further guidance is provided as to an appropriate transition or the interface with the river. Getting this right will be particularly important given the narrowness of the site.

The Board suggests that an arena, with active uses at ground level may be appropriate, but only if there no net loss of Park Lands. Investigations of innovative way to provide city green space should be undertaken to determine whether any design aspects may be appropriate in the context. For example, the famous High Line in New York City is a great example of preservation and innovation coming together, through the adaptive reuse of an existing structure to create new recreational amenity and public promenades. With a master plan for the Entertainment Precinct, perhaps a similar approach by building over the railway lines to provide a new recreational space may mean there would be no net loss of Park Lands to the people of South Australia and may result in an excellent, high quality design outcome.

Innovation Subzone

Frome Park / Nellie Raminyemmerin, between the new Botanic High School and the Lot Fourteen site, was reclaimed as public green space from an old car park in the late 1990s. It forms a valuable green space connection to the Botanic Garden, is used for WOMADelaide and other events and contains a little known, but highly significant site for Kauria. There has been no valid reason given for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone - Innovation Subzone and rezoning is not required as the high school has existing land use rights. The rezoning puts Frome Park at risk as it enables the transition from open green space to an ancillary area for Lot Fourteen and Botanic High School. The Board does not support the extension of the Innovation Subzone to the proposed location and requests that it remain within the more appropriate Adelaide Park Lands Zone.

Summary

Large-scale built form, such as sporting arenas, commercial car parks and residential or commercial buildings, are completely at odds with the statutory principles of the Park Land's Act including:

- the land comprising the Adelaide Park Lands should, as far as is reasonably appropriate, correspond to the general intentions of Colonel William Light in establishing the first Plan of Adelaide in 1837; and
- the interests of the South Australian community in ensuring the preservation of the Adelaide Park Lands are to be recognised, and activities that may affect the Park Lands should be consistent with maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

The Adelaide Park Lands are a key feature of the State Government's bid for Adelaide to become a National Park City. Facilitating further built form development and enabling the commodification of the Park Lands is inconsistent with this ambition.

In 1902, the Adelaide Park Lands inspired the Garden Cities movement through Ebenezer Howard. We should take heart from that inspiration. One of the most liveable cities in the world should not be building on its Park Lands. We should only ever improve parks, make them more beautiful, more rewarding. This is especially so at a time when urban infill in greater Adelaide is increasing, and the wonderful opportunities of the Park Lands are becoming ever more important to the broader community.

In addition, because of the potential impacts on the National Heritage Listing of the Adelaide Park Lands and City, the Board urges the State Government to refer the proposed Riverbank Precinct Code Amendment, Riverbank Arena and commercial car park associated with the new Women's and Children's Hospital to the Australian Government's Minister for the Environment. Such momentous policy proposals and developments deserve consideration as actions which may affect the National Heritage Listing, in accordance with the requirements of the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*.

Kind regards



Sandy Verschoor
Lord Mayor, City of Adelaide
Presiding Member, Adelaide Park Lands Authority

26 October 2021

cc
Minister for Planning and Local Government
Minister for Environment and Water
CEO Attorney-General's Department
State Government's Planning and Land Use Services

Adelaide City Council

Dear PlanSA

Please find attached the advice of the City of Adelaide Council on the Riverbank Precinct Code Amendment.

Should you have any questions, please contact me as below.

Kind regards

Maddie

Maddie [REDACTED]
Team Leader – City Policy

Kaurna Country
Colonel Light Centre

2nd Floor, 25 Pirie Street, Adelaide, South Australia, 5000

P | 08 [REDACTED]

E | [REDACTED]





OFFICE OF THE LORD MAYOR

The Honourable Steven Marshall MP
Premier of South Australia
GPO Box 2343
ADELAIDE SA 5001

Dear Premier

Steven

Thank you for providing the City of Adelaide with the opportunity to comment on the Riverbank Precinct Code Amendment (Code Amendment) by the State Government.

The City of Adelaide acknowledges that the Code Amendment has been drafted to facilitate a series of major projects within the Riverbank Precinct and also provide for additional land uses and built form (including multi-storey buildings in some locations) not currently envisaged within the Adelaide Park Lands.

At its meeting on 26 October 2021 the Council finalise its comments on the Code Amendment. In preparing this advice the City of Adelaide has undertaken substantial consultation with Council Members, Council Administration, and advisory Committees on the Code Amendment in order to identify and understand the impacts and opportunities provided by the Code Amendment. A copy of the City of Adelaide's submission is attached for your consideration, with a brief summary of the key points identified below.

Importance of the Adelaide Park Lands

The Riverbank Precinct adjacent the River Torrens / Karrawirra Pari is central to the Adelaide Park Lands and City Layout. The Adelaide Park Lands (and City Layout) is regarded as the most complete example of nineteenth-century colonial planning. The historical layout also remains clearly legible today and is also the only Australian city to be completely enclosed by park lands. The Adelaide Park Lands are Nationally Heritage listed and of great Kaurna significance, they are unique and valuable green space which provide a significant cooling effect for our city, provide habitat for our valuable flora and fauna, and should be protected for the benefit of future generations.

The Code Amendment proposes to move several areas within the Adelaide Park Lands and rezone them to the City Riverbank Zone. In doing so, it will remove key policies which protect the open, accessible landscaped character of the Adelaide Park Lands.

Given the significance of the Park Lands, the proposed policy outcomes in the Code Amendment are inconsistent with the statutory principles in the *Adelaide Park Lands Act 2005* and the Adelaide Park Lands Management Strategy.

Lack of Investigations to Support the Code Amendment

The City of Adelaide has identified a lack of investigations undertaken by the designated entity in the preparation of the Code Amendment, including the missed opportunity to genuinely engage with the City of Adelaide and Kaurna peoples who have substantial knowledge and expertise of the areas has meant that the context and significant importance of the land proposed to be rezoned has not been fully understood.

This has been demonstrated in the limited assessment and review of the proposed policy changes against all of the relevant State Planning Policies, contrary to the requirements of the *Planning, Development and Infrastructure Act 2016 (SA)*, particularly relating to biodiversity, climate change and cultural heritage.

Community Engagement and Procedural Shortcomings

The nature and extent of the community engagement undertaken is inadequate to enable genuine consideration and feedback to be provided by all affected stakeholders, including the Kaurna peoples.

The draft Code Amendment is missing important information that would enable understanding of the implications of the proposed policy changes. This outcome is inconsistent with Principle 4 of the Community Engagement Charter, namely that "*Engagement is informed and transparent*".

Summary

The City of Adelaide supports appropriate public infrastructure and strategic development of the Riverbank Precinct that will enhance the social, economic and environmental values, however, does not support the Riverbank Precinct Code Amendment released for consultation.

The City of Adelaide welcomes the opportunity to continue to work with the State Government to investigate and develop a Master Plan for the Riverbank Precinct to facilitate appropriate outcomes for this nationally significant part of Adelaide and South Australia.

Yours sincerely



Sandy Verschoor
LORD MAYOR

CC: Minister for Planning and Local Government
Minister for Environment and Water
Chief Executive Officer, Attorney General's Department
Planning and Land Use Services

27 October 2021

RIVERBANK PRECINCT CODE AMENDMENT

City of Adelaide Submission

ENDORSED: 9 November 2021

ACKNOWLEDGEMENT OF COUNTRY

The City of Adelaide acknowledges that we are located on the traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past, present and emerging.

We recognise and respect their cultural heritage, beliefs and relationship with the land. We also extend that respect to visitors of other Aboriginal Language Groups and other First Nations.

DOCUMENT PROPERTIES

Contact for enquiries and proposed changes

If you have any questions regarding this document or if you have a suggestion for improvements, please contact:

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Title: Team Leader - City Policy
Program: City Planning & Heritage
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2	10/11/2021	MF	Revised as per Council decision on 9 November 2021 (Item 17.10) Revision involves changes made to section 9.2 – Entertainment Subzone

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1. EXECUTIVE SUMMARY

The Riverbank Precinct Code Amendment (Code Amendment) by the State Government is drafted to facilitate a series of major projects within the Riverbank Precinct and also provide for additional land uses and high-rise built form not currently envisaged within the Adelaide Park Lands.

The Riverbank Precinct adjacent the River Torrens / Karrawirra Pari is central to the Adelaide Park Lands and City Layout. The Adelaide Park Lands (and City Layout) is regarded as the most complete example of nineteenth-century colonial planning. The historical layout also remains clearly legible today and is also the only Australian city to be completely enclosed by park lands. The Adelaide Park Lands are Nationally Heritage listed and of great Kaurna significance, they are unique and valuable green space which provide a significant cooling effect for our city, provide habitat for our valuable flora and fauna, and should be protected for the benefit of future generations.

Within the limited time available the City of Adelaide has undertaken substantial internal consultation with Council Members, Council Administration, and advisory Committees on the Code Amendment in order to identify and understand the impacts and opportunities provided by the Code Amendment.

The key impacts and opportunities that have been identified are:

1. The importance of the Adelaide Park Lands to the South Australian community and the rationale for their inclusion (along with the City Layout) on the National Heritage List and the need to mitigate the cumulative erosion of Park Lands that has occurred, particularly in the Riverbank Precinct.
2. The proposed policy outcomes are inconsistent with the statutory principles in the *Adelaide Park Lands Act 2005* and the Adelaide Park Lands Management Strategy. There are examples over time where built form in the Park Lands has been returned to Park Lands to conserve Light's vision and provide beautiful open space for the benefit of the South Australian community.
3. The Riverbank Precinct Code Amendment proposes to move several areas within the Adelaide Park Lands and rezone them to the City Riverbank Zone. In doing so, it will remove several relevant key policies which protect the open, accessible landscaped character of the Adelaide Park Lands.
4. The current planning provisions are adequate to appropriately activate the Riverbank Precinct whilst still protecting the open and natural setting of the Adelaide Park Lands to a high amenity.
5. The inadequacy of the investigations and responses to the State Planning Policies (SPP), particularly with reference to:
 - a. SPP4: Biodiversity - Increasing built-form, and thus removing the vegetation and habitat may impact known species found within Park 27. For example, the 'Eastern Water Skink' calls Park 27 home and is a listed vulnerable species. And a 2018 survey recorded a newly found species to Park 27, the 'Australian Emerald' also making it the most western record of the species in South Australia.
 - b. SPP5: Climate Change – the Park Lands have a cooling effect and minimise the urban heat island effect of surrounding built form areas.
 - c. SPP7: Cultural Heritage: The city in a park is highly regarded as “a masterwork of urban design”. The Adelaide Park Lands are of great significance to Kaurna. The City of Adelaide, State Government and Mount Lofty Rangers Group are currently

seeking that the Adelaide Park Lands, City Layout and Mt Lofty ranges settlement story to be a listed World Heritage Area.

6. The draft Code Amendment for consultation does not include significant information and investigations that would enable understanding of the implications of the proposed policy changes. This lack of transparency is inconsistent with Principle 4 of the Community Engagement Charter, namely that “Engagement is informed and transparent”

In regard to the specific Precincts proposed to be rezoned in the Code Amendment the City of Adelaide has identified the following key impacts and opportunities.

This submission details Council’s advice on each area proposed to be rezoned by the Code Amendment, and will cover the following summarised points.

Health Subzone expansion:

- No objection to new Women’s and Children’s Hospital site within the current City Riverbank Zone, however, do not support the expansion of built form into Kate Cocks Park and encourage the State Government to find an alternate location and/or solution for its transit hub/car park.
- Highlight of the unique biodiversity within this area.
- Loss of connection to the city and therefore potential to not contribute economically back to core Central Business District.
- Importance of access and universal design.
- Do not support the rezoning of this land from Adelaide Park Lands Zone.

Entertainment Subzone expansion:

- Request no net loss of Park Lands and suggest that for any additional built form, that open and publicly accessible green space is created possibly by creating new open space over the train corridor.
- Highlight of the unique biodiversity within this area.
- Significant infrastructure, access and emergency management considerations that must be considered by way of whole of precinct planning prior to any planning policy changes occurring.

Innovation Subzone expansion:

- Do not support the proposal to rezone this land as it is not required to facilitate the existing High School and the land is important open space, provides critical connections within the Park Lands, provides habitat for protected species and is a highly significant site for Kaurna.

Riverbank Subzone:

- Do not support this subzone, as the area can already be activated through the existing Adelaide Park Lands Zone principles and hosts many events annually.
- The area is particularly important to Colonel Light’s original plan, with reference to views from North terrace down the banks to the River Torrens.
- The land is highly significant to Kaurna and this should be respected and left free from additional built form.

2. RIVERBANK PRECINCT CODE AMENDMENT – CITY OF ADELAIDE SUBMISSION

Background

A summary of the Riverbank Precinct Code Amendment and observations of the proposed policy was presented to the Committee at their meeting 28 September 2021.

To view this presentation, [please click here](#).

3. IMPORTANCE OF THE RIVERBANK PRECINCT WITHIN THE ADELAIDE PARK LANDS



Figure 1: Helen Mayo Park (Park 25)

21 October 2021. (Source: City of Adelaide)

The Riverbank Precinct lies at the heart of the Adelaide Park Lands, as defined by the *Adelaide Park Lands Act 2005* (APL Act).

The APL Act was developed in the early 2000s at a time when the Adelaide Park Lands were under threat from development, most notably in the form of the National Wine Centre and Next Generation fitness centre. The purpose of the APL Act was to “*establish a legislative framework that promotes the special status, attributes and character of the Adelaide Park Lands; to provide for the protection of those park lands and for their management as a world-class asset to be preserved as an urban park for the benefit of present and future generations*”.

Importantly, the APL Act contains seven statutory principles, which, in summary, state that the Adelaide Park Lands should:

- Correspond with the general intention of Colonel William Light’s first Plan of Adelaide in 1837.
- Be held for the public benefit of the people of South Australia, and be available for their use and enjoyment.
- Reflect and support a diverse range of environmental, cultural, recreational and social values and activities.
- Provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the city.
- Contribute to the natural heritage and improve the biodiversity and sustainability of the Adelaide Plains.
- Be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government.
- Reflect the interests of the South Australian community in maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

Over the last 184 years, that stretch of the Adelaide Park Lands between North Terrace and River Torrens / Karrowirra Pari, some 166ha, has been subject to continuous built form encroachments. Over 71ha, or 42%, of that space has been lost to various institutions, venues, hotels, hospital and car parks.

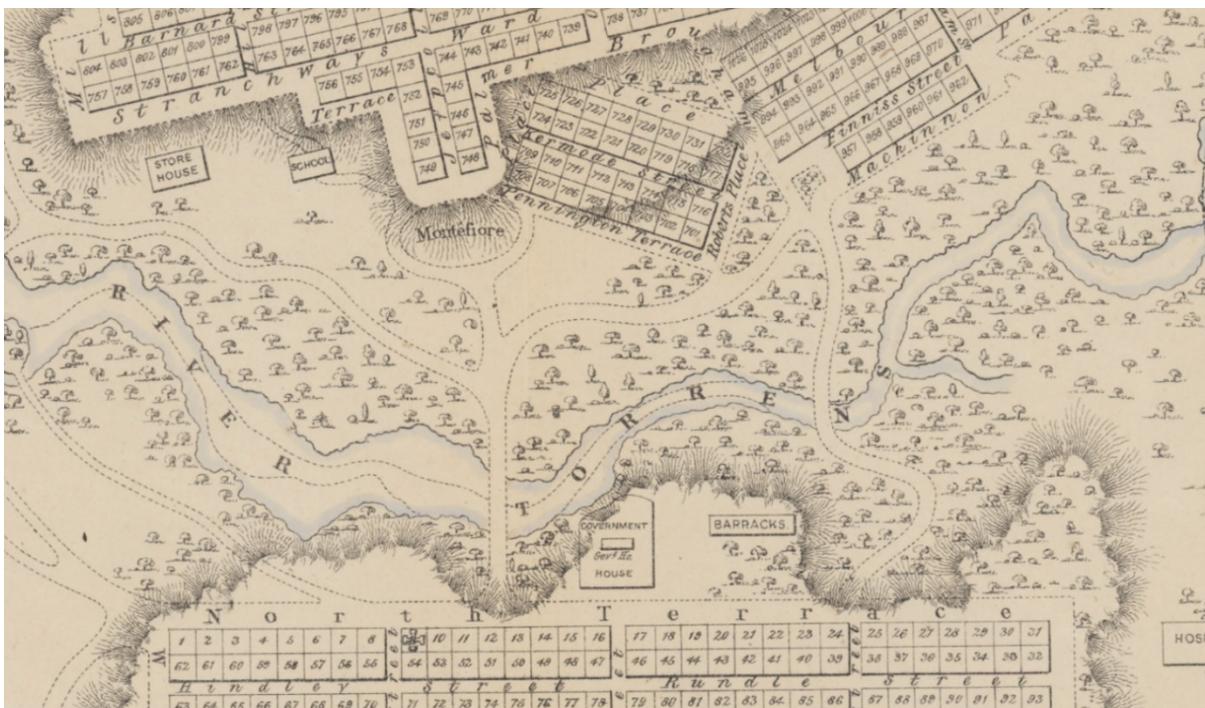


Figure 2: Section from: *Plan of the City of Adelaide*, drawn by Colonel William Light, 1839

(Source: National Library of Australia [Plan of the city of Adelaide \[cartographic material\] : with the acre allotments numbered / surveyed ...](#) | National Library of Australia (nla.gov.au))

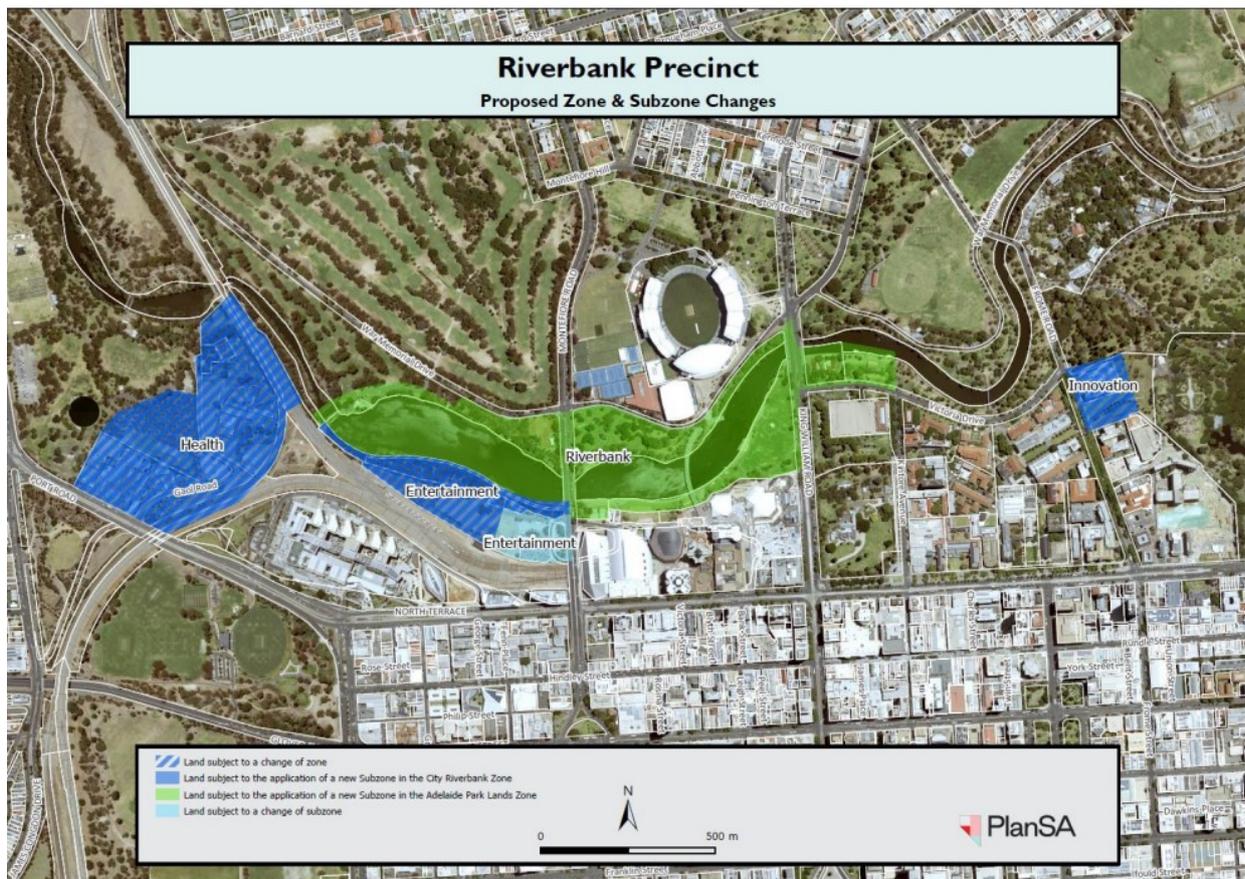


Figure 4: Attorney-General's Department, 'Proposed zone and subzone changes map', 15 September 2021
 (Source: [Riverbank Precinct Code Amendment - proposed zone and subzone changes map \(plan.sa.gov.au\)](https://www.plan.sa.gov.au))

3.1 What We Have Heard

Given the significance of the Adelaide Park Lands and the potential impacts of the proposed Code Amendment the City of Adelaide has prepared this submission on the Code Amendment based on feedback from the following organisations and groups:

- Council Members
- Council Administration
- Adelaide Park Lands Authority
- Reconciliation Committee
- Resident Groups

The extent of supplementary engagement to inform our response was curtailed by the short consultation timeframe available. Responses obtained from each of these groups are incorporated into this submission.

4. MASTER PLAN REQUIRED TO INFORM ANY CHANGES

The Riverbank Precinct Code Amendment (Code Amendment) clearly envisages more built form and further loss of open space. The removal of land from the Adelaide Park Lands Zone proposed in the Code Amendment sets up a planning framework that could lead to development which is inconsistent with the Park Lands values. This could include an increase in buildings, (including buildings of significant scale), less emphasis on open space and less emphasis on public use which, in turn, will lead to the alienation of public land.

It is difficult to understand the State Government's vision for the Riverbank Precinct without a current Master Plan. Any changes of the scale proposed by this Code Amendment should be progressed firstly through a master plan process, undertaken jointly by the City of Adelaide and State Government. Formal policy changes should only be proposed following this process.

The Master Plan should be undertaken in conjunction with the City of Adelaide and seek protection and enhancement of the unique biodiversity and cultural significance of the Riverbank Precinct and ensure any additional built form delivers exemplary design outcomes.

This process should occur prior to any planning policy changes being implemented.

5. REQUEST FOR FURTHER INFORMATION

The City of Adelaide wrote to the Designated Entity (CEO of Attorney General's Department) regarding the Code Amendment on 22 September 2021. The intent of this letter was to request an extension of time to provide a submission on the Code Amendment as well as identify missing information in the Code Amendment on public consultation regarding Assessment Tables and advise that the draft Code Amendment did not respond to the Planning, Development and Infrastructure Act 2016 (SA) s 62A and State Planning Policy 4: Biodiversity.

On 14 October 2021, the CEO of the City of Adelaide received a response letter with attachments of some of the requested information that was missing from the public consultation material. This included an updated table responding to the State Planning Policies, with SPP4: Biodiversity provided and an amended version of Table 3 – Applicable Policies for Performance Assessed Development and Table 4 – Procedural Matters – Notification Table” for the Adelaide Park Lands Zone and City Riverbank Zone”. The response also noted the Draft Code Amendment did not propose any changes to Tables 1 and 2 of either the City Riverbank Zone or the Adelaide Park Lands Zone.

It is noted that this information was provided to Council, however the public consultation material on the State Government's YourSAy page was not updated.

6. ALIGNMENT WITH STATE PLANNING POLICIES

It is a requirement that all Planning and Design Code Amendments identify the 'relevant principles or objectives of the State Planning Policies and an assessment of the proposed Code Amendment's alignment with those State Planning Policies'.¹

¹ State Planning Commission, *Practice Direction 2: Preparation and Amendment of Designated Instruments* – Version 4 (27 May 2021) <[Practice Direction 2 - Preparation and Amendment of Designated Instruments \(plan.sa.gov.au\)](https://www.plan.sa.gov.au/practice-direction-2-preparation-and-amendment-of-designated-instruments)>

As identified in the letter to the CEO of the Attorney-General’s Department on 22 September 2021, the City of Adelaide has identified gaps in the State Planning Policies reviewed in the Code Amendment and in the assessment of the Code Amendment against the State Planning Policies as detailed below.

6.1 State Planning Policy 4: Biodiversity

On 14 October Figure 5 was provided to the City of Adelaide outlining the State Government’s assessment of the Code Amendment against the Biodiversity State Planning Policy.

State Planning Policy (SPP)	Code Amendment Alignment with SPPs
<p>SPP 4: Biodiversity <u>Objective: To maintain and improve our state’s biodiversity and its life supporting functions.</u></p> <p><u>Policy 4.1 Minimise impacts of development on areas with recognised natural character and values, such as native vegetation and critical habitat so that critical life-supporting functions to our state can be maintained.</u></p> <p><u>Policy 4.2 Recognise the value of modified landscapes and allow appropriate scaled development that can co-exist with and safeguard biodiversity values and critical functions.</u></p> <p><u>Policy 4.3 Encourage the reintroduction of biodiversity or its components in development areas to provide life supporting functions at low cost.</u></p> <p><u>Policy 4.4 Enhance the biodiversity of urban areas and townships through a connected and diverse network of green infrastructure systems along streetscapes, major watercourses, linear parks, open space, the coast and other strategic locations.</u></p> <p><u>Policy 4.5 Where impacts to biodiversity cannot be avoided, these impacts should be minimised and where possible, offset.</u></p> <p><u>Policy 4.6 Encourage nature-based tourism and recreation that is compatible with, and at an appropriate scale for, conserving the natural values of that landscape.</u></p>	<p><u>Some targeted rezoning of park lands is proposed by the Code Amendment in relation to locations that already contain a significant development footprint (eg. Old Adelaide Gaol, Police Barracks and Adelaide Botanic High School) or are generally underutilised / inaccessible to the public (eg. area north of the railway line and west of Montefiore Road).</u></p> <p><u>The intent of the Code Amendment is to improve existing built form / landscaped outcomes in these areas while also facilitating greater public accessibility and connectivity between the City, riverbank and park lands in key locations.</u></p> <p><u>Greater activation at these locations (through the introduction of new land uses) will also rejuvenate these areas and make them more publicly accessible.</u></p> <p><u>Key open space links including that located south of the Adelaide Botanic High School will continue to be protected through new policy and inclusion on a Concept Plan.</u></p> <p><u>The central riverbank area which is being retained in the Adelaide Park Lands Zone will retain its primary role as an area for both formal and informal recreational activities but will now be supported with complementary development which contributes to this locations role as a tourist destination / people attractor.</u></p> <p><u>The Code Amendment will continue to enhance the Park Lands at this location by continuing the desire for an open landscaped setting while limiting building floor areas and height, limiting environmental impact and providing new buildings / infrastructure of quality design for public / community benefit.</u></p>

Figure 5: Capture from Attachment 2 to letter from CEO AGD to CEO City of Adelaide, providing their updated table responding to SPP 4: Biodiversity, received via e-mail 14 October 2021.

With respect, the State Government’s response to how this Code Amendment aligns with this State Planning Policy misses the mark. The comments talk about built form, activation and access, but provides no discussion on the existing unique biodiversity within the area and the impacts or opportunities that this Code Amendment may have if finalised.

In response to State Planning Policy 4: Biodiversity, the City of Adelaide provides the following information about the biodiversity within the areas affected within this Code Amendment which must be taken into consideration in any policy development.

Karrawirra Pari, including Torrens Lake falls within the scope (and management actions) of the Council’s Integrated Biodiversity Management Plan – 2018/2023 (IBMP). This plan was approved by Council in 2018 and has 36 actions for the management of the city’s biodiversity.

The ‘Fauna survey of Adelaide Park Lands, Adelaide (SA) – Spring 2017 and Autumn 2018’ identified a number of species that were only located within Park 27. Whilst the survey area within Park 27, was slightly northwest of the area identified within this Code Amendment, due to similar nature of flora within the area and access to the River Torrens, it is believed that the entire Park 27 area would play home to several species. Of mention is the ‘eastern water skink’ which is listed as a vulnerable species and the ‘Australian Emerald’ dragonfly, with this survey identifying Park 27 as the most western record of the dragonfly in South Australia and is a new habitat location for this species in South Australia.



Figure 6: Eastern Water Skink
(Source: Photographer: Victoria McCarron)

Any additional built form on the Park Lands will greatly impact the goal to create ideal habitats for native species that we aim to conserve, attract to the Park Lands and retain here. That is not to say that built form cannot also create animal habitat, it can, but not as effectively or authentically as when habitat is created without the built form i.e. through applied conservation land management including native revegetation.

Built form will also reduce net soil permeability of the Park Lands. Buildings require foundations and paths that will essentially remove the soil ecosystems and the ecological processes that they provide, including but not limited to: food source for birds and other larger animals, soil nutrient cycling (carbon, nitrogen, phosphorus), water cleansing, improved microbiome diversity and associated health benefits, and city cooling.

It is well understood by experts of Adelaide's natural heritage that the Adelaide Park Lands were managed by the Kaurna people as (in simple terms) open woodlands rich in grasses and forbs. Lines of sight were kept relatively open and there were not dense forests. The presence of certain plants (including trees), planted in an open woodland structure have attracted the local native animals, including birds, back into the city.

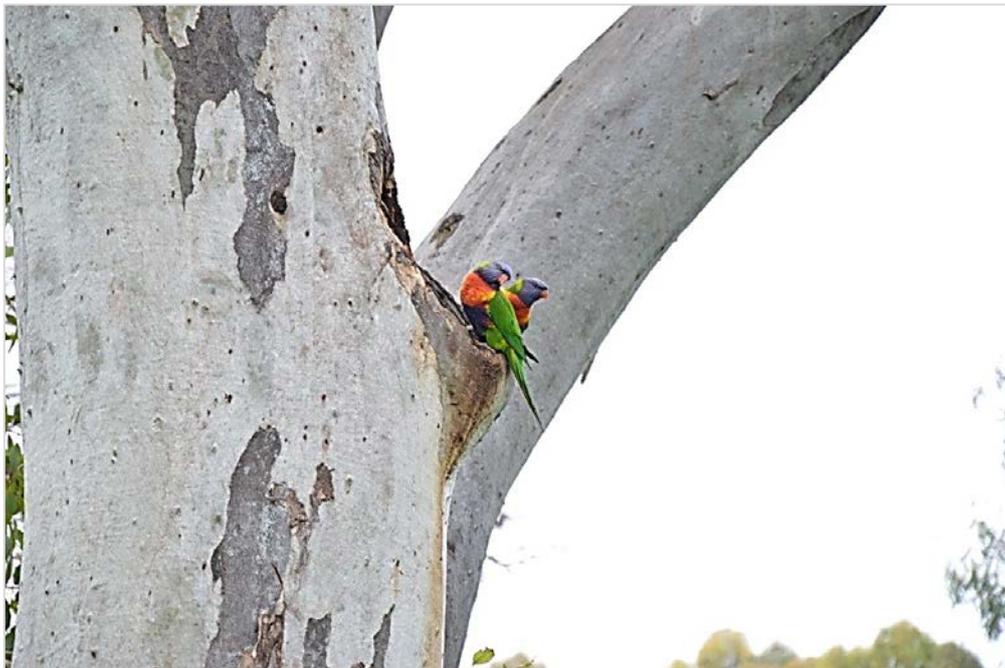


Figure 7: Lorikeets nesting in a hollow within an established tree. Helen Mayo Park, 21 October 2021.

(Source: City of Adelaide)

The proposed Code Amendment appears to make no room for a step in this direction and tend towards increasing built form and a reduction in established trees. Hollow-bearing trees (that are used for nesting) cannot be replaced by revegetation projects surrounding new built form. Planting 50 trees (for example) will not provide the ecological services of a single 100+ year-old tree – at least not for several decades – and by that time the animals could no longer exist in the city.

The concept of ecological connectivity (sometimes called corridors) is very important in creating resilient ecosystems. Establishing, improving or at the very least retaining the green space that we have helps to facilitate movement of plant genetic material (seed/pollen) and animals between patches of higher biodiversity. In times of a changing climate and shrinking/shifting habitats, the movement of genetic material is very important – plants

benefit from cross pollination and exposure to new sites to colonise while animals need to be able to move between sites to find shelter and resources.

The promoted increase in human activity around the river will have unavoidable impacts to the terrestrial and aquatic biodiversity. This will be in the form of increased pollution in various forms: litter, noise, light, toxic contaminants (soil and water). These increases will result in changes to the local biodiversity and surrounding environment that are extremely unlikely to be in line with what our local native species need to survive.

6.2 State Planning Policy 5: Climate Change

Similar to biodiversity, the State Government’s response to State Planning Policy 5: Climate Change has also missed the mark. The response talks of access and references other environmental or sustainability policies within the current Planning and Design Code which may be used in an assessment of an application in this location. However, the investigations fail to examine the unique and important role that the Adelaide Park Lands play in assisting with mitigating the effects of Climate Change.

State Planning Policy (SPP)	Code Amendment Alignment with SPPs
<p>SPP 5: Climate Change Objective: <i>Provide for development that is climate ready so that our economy, <u>communities</u> and environment will be resilient to climate change impacts.</i></p> <p>Policy 5.1 <i>Create carbon-efficient living environments through a more compact urban form that supports active travel, <u>walkability</u> and the use of public transport.</i></p> <p>Policy 5.2 <i>The good design of public places to increase climate change resilience and future liveability.</i></p> <p>Policy 5.3 <i>Facilitate climate-smart buildings to reduce our demand for water and energy.</i></p> <p>Policy 5.4 <i>Mitigate the impacts of rising temperatures by encouraging water sensitive urban design, <u>green infrastructure</u> and other design responses.</i></p>	<p>The Code Amendment will contribute to this policy by encouraging the further development of a State significant health / entertainment / cultural and education precinct <u>in close proximity</u> to established transport networks (including rail / tram / road and pedestrian / bicycle infrastructure).</p> <p>The focus of the Code Amendment in improving shared use pathway connections between the CBD and the riverbank and along the river / linear park will also have a positive impact on general active travel and walkability in the Riverbank Precinct.</p> <p>Future development in the Precinct will also continue to be assessed against the key environment / sustainability policies of the Code, including those captured in relevant Overlays which apply to the Precinct or in general Code policies that apply to different forms of development.</p>

Figure 8: Attorney-General’s Department, ‘Code Amendment – draft for consultation (Attachment D)’, 15 September 2021

(Source: [Riverbank Precinct Code Amendment - for consultation \(plan.sa.gov.au\)](http://plan.sa.gov.au))

In response to State Planning Policy 5: Climate Change, the City of Adelaide provides the following information about the areas provided within this Code Amendment which must be taken into consideration in any policy development in order to meet the State Planning Policy of Climate Change.

City of Adelaide's Strategic Plan 2020-24 has a vision to become ***“the most liveable city in the world”*** with a key outcome of “environmental leadership”, including:

- *“Enhanced greening and biodiversity, and*
- *A climate ready organisation and community”.*

The Strategy specifically identifies a key action of *“increasing street tree canopies and green infrastructure in city hot spots and public spaces.”*

The Adelaide Design Manual for Greening, which governs the design of the public realm in the City of Adelaide, recognises green infrastructure elements as *“fundamental in creating a high quality of life, and play an important role in creating a city that is climate resilient and adaptable to future needs.”* One of the key principles is to *“work towards a continuous and connected tree canopy, which will benefit people by reducing the urban heat island effect, create microclimates and habitat benefits, and beautify the city streets.”*

The 30-Year Plan for Greater Adelaide has a greening target of increasing our tree canopy cover by 20% by 2045, and as such the Council agreed on a public realm Tree Canopy Target in 2017, to increase canopy cover in the CBD (25%) and North Adelaide (40%) by 2040. In March 2019, City of Adelaide set a specific Street Tree Canopy Target for the CBD West of 20% by 2021.

CoA is a member of Resilient East. Resilient East is a Climate Change Adaptation Partnership between 8 Councils and State Government working together since 2012 investigating and responding to the impacts of climate change in our region. *“Our goal is to improve the resilience of communities, assets and infrastructure, local economies and natural environments so we can cope with the challenges and opportunities of climate change.”* As such all partners have committed to a Climate Change Adaptation Action Plan and the Canopy Mission Statement that *“by 2045, Resilient East Councils will increase canopy and green cover by a proportional 20%, compared with 2013 levels, creating cooler more liveable places for comfort, amenity and urban biodiversity”.*

One of the projects instigated by Resilient East is the Urban Heat Mapping project leading to a related Report and the Urban Heat Mapping Viewer. This Report and recent research has demonstrated that different surfaces absorb and release heat at different rates, with canopy proving the coolest surface, up to 10°C cooler than asphalt roads which heat up in the daytime and release heat at night. It has been found that adding moisture and greenery to the urban environment can reduce land surface temperature, air temperature and hence the urban heat island (UHI) effect (Sharifi, E. et al, 2017).

In addition, research conducted by local Universities has concluded that there is an Adelaide UHI effect, and that the temperature difference between the Park Lands and CBD differs by up to 4°C, but significantly reduces when wind speed reaches 3m/s, indicating the cooler air is mixed with hotter air, cooling the CBD (Clay, R et al, 2016, Soltani, A. & Sharifi E., 2017).

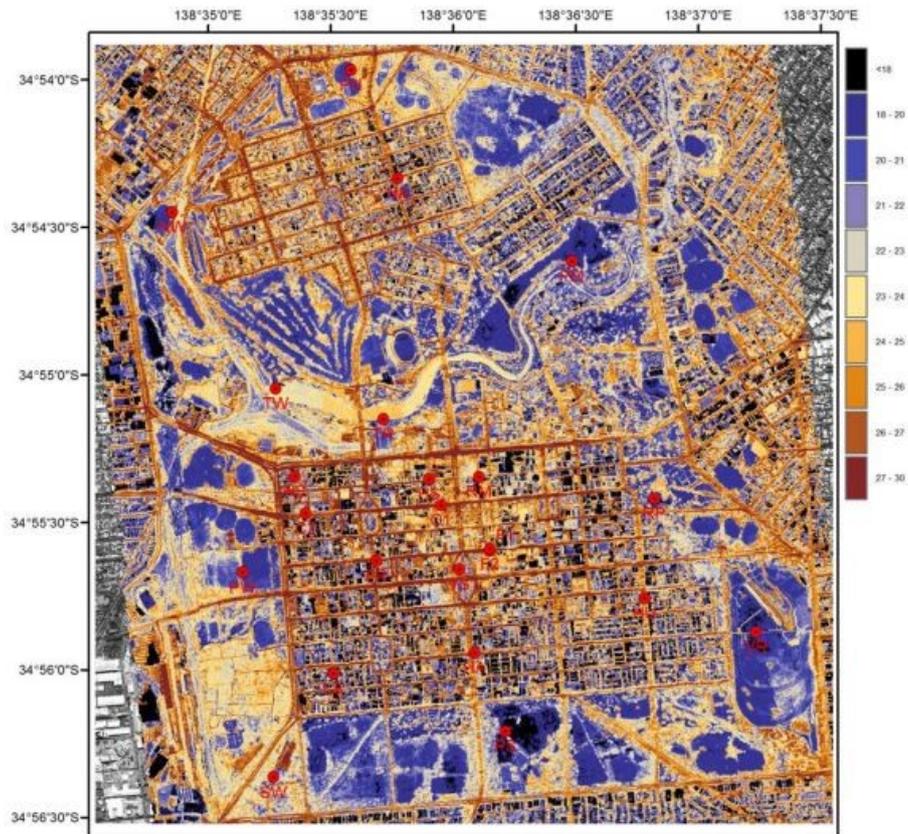


Figure 3.5 Surface brightness temperatures of the CBD and North Adelaide compiled from airborne one-metre resolution measurements made in the early hours (00:30 to 02:30 hrs) of 7 March 2011. The variation in temperature within the built-up regions is clearest along roads, while the Park Lands provide strong contrasts. The red dots indicate air temperature monitoring sites.

Figure 9: Characterisation, Interpretation and Implications of the Adelaide Urban Heat Island.

(Source: Flinders University and University of Adelaide, June 2013)

The Park Lands were found to be cooler than inner and outer suburbs almost all day (Soltani, A. & Sharifi E., 2017). Research also indicates that Adelaide's UHI could be exasperated by a local CO₂ effect (Clay, R et al, 2016). With the predicted increase of a 3-4°C global warming by the end of the century (IPCC, 2021), along with longer heatwaves and less rainfall and the understanding that dark, hard and impervious surfaces exacerbate the UHI effect it is imperative that we preserve existing and increase new canopy and green spaces.

6.3 State Planning Policy 7: Cultural Heritage

The consideration of State Planning Policy 7: Cultural Heritage does not have regard to the layered and significantly important heritage of the Adelaide Park Lands. The analysis on the State Planning Policy 7: Cultural Heritage relates only to built form heritage and does not make mention on the significant Kaurna Heritage or National Heritage Listing of the Park Lands.

State Planning Policy (SPP)	Code Amendment Alignment with SPPs
<p>SPP 7: Cultural Heritage Objective: <i>To protect and conserve heritage places and areas for the benefit of our present and future generations.</i></p> <p>Policy 7.1 <i>The sensitive and respectful use of our culturally and historically significant places.</i></p> <p>Policy 7.2 <i>Recognise and protect Indigenous cultural heritage sites and areas of significance.</i></p> <p>Policy 7.3 <i>Recognise and protect places and areas of acknowledged heritage value for future generations.</i></p> <p>Policy 7.4 <i>The appropriate conservation, continuing use, and as appropriate, adaptive reuse of our heritage places and heritage areas of value to the community.</i></p>	<p>The Code Amendment will further encourage the adaptive reuse of heritage buildings in the Riverbank Precinct for a wider range of purposes.</p>

Figure 10: Attorney-General's Department, 'Code Amendment – draft for consultation (Attachment D)', 15 September 2021

(Source: [Riverbank Precinct Code Amendment - for consultation \(plan.sa.gov.au\)](https://www.plan.sa.gov.au/riverbank-precinct-code-amendment-for-consultation))

In response to State Planning Policy 7: Cultural Heritage, the City of Adelaide provides the following information about the cultural heritage within the areas provided within this Code Amendment which must be taken into consideration in any policy development.

The Kurna peoples are the Traditional Owners of the land. The Karrawirra Pari / River Torrens and surrounds are a living entity to Aboriginal cultures, and this has not been recognised in the State's response to SPP 7: Cultural Heritage. The land surrounding Karrawirra Pari is recognised and recorded Kurna campsites and burial grounds and hold high significance to the Kurna peoples and wider Aboriginal communities.

At a special meeting of the City of Adelaide Reconciliation Committee, on 21 October 2021, the Committee discussed the Code Amendment and provided the following advice to Council:

It is recommended that targeted, genuine and culturally appropriate consultation is undertaken by the Attorney General's Department – Planning and Land Use Services with Traditional Owners, the Kurna peoples, and be deemed as high priority in addition to any online submissions.

Subsequent to the establishment of the APL Act, in 2008 the Adelaide Park Lands and City Layout was included on Australia's National Heritage List, which states:

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth century park lands in Australia.

The inclusion on the National Heritage List, as “a masterwork of urban design”, confirmed the importance of the Park Lands to Adelaide’s identity and to the Nation’s heritage. It was included for many reasons, including that the Park Lands and City Plan is “*substantially intact and reflects Light’s design intentions with high integrity*”.

It is disappointing that the Code Amendment has not addressed or discussed the values associated with the National Heritage Listing. Whilst the National Heritage listing is mentioned in the current Adelaide Park Lands Zone policy, the proposed Code Amendment would remove this policy when land is rezoned to the City Riverbank Zone. The Code Amendment proposes policy that would allow for notable changes to the layout of the National Heritage Listing and envisages development that would permanently remove the fabric of the National Heritage Place by allowing for multi-level car parking and other built form and land uses in the Park Lands which is inconsistent with the relevant values. To say that the Code Amendment will not impact the National Heritage Listing is misleading, the Code Amendment will allow for the permanent removal of open space from the Park Lands, the very essence of the National Heritage listing. The State Government should undertake a strategic assessment under the *Environment Protection and Biodiversity Conservation Act 1999* prior to progressing the policy changes to ensure the policy directions are consistent with the heritage values of the National Heritage Place.

Further to the National Heritage Listing, the City of Adelaide, in partnership with the State Government Department for Environment and Water (Heritage Branch) are currently working towards having the Adelaide Park Lands and City Layout listed as a State Heritage Area. City of Adelaide, the State Government Department for Environment and Water (Heritage Branch) and Mount Lofty Ranges Group are also working together on a bid to have the Adelaide Park Lands, City Layout and Mount Lofty Ranges, settlement story to be World Heritage Listed. This project recognises the significance of the Park Lands.

Further, the Riverbank Precinct Code Amendment has only referred to SPP 7.1, 7.2, 7.3 and 7.4. Key and highly relevant policies have been overlooked during the preparation of the draft policy changes.

- SPP 7.6 “the interpretation potential of heritage places and areas is enhanced to contribute to the economic and cultural sustainability of the state”
- SPP 7.7 “Provide certainty to landowners and the community about the planning processes for heritage identification, conservation and protection”.

The proposed policies only have reference to built heritage, however the intent of SPP 7 – cultural heritage, relates to both European and indigenous cultural heritage sites. SPP 7.6 is highly relevant, because it provides for the creation of Planning and Design Code policies which might seek to encourage cultural heritage interpretation opportunities, which would be particularly of value within the Riverbank Precinct area.

The wholesale changes which could be brought about through the ambitious provisions of the Code Amendment would seriously undermine the integrity of the Park Lands and further enable the commodification of our public land.

7. INFRASTRUCTURE

The Code Amendment does not recognise that much of the area proposed for rezoning is currently Park Lands, with limited provision of transport, stormwater, lighting, utilities and safety infrastructure.

The infrastructure analysis within the Code Amendment does not adequately acknowledge that development within the proposed Zones and Subzones may require significant augmentation of infrastructure.

8. COMMUNITY ENGAGEMENT AND PROCEDURAL SHORTCOMINGS

The engagement approach and timing in relation to the proposed Code Amendment is not consistent with the *Planning, Development and Infrastructure Act 2016* (SA) (PDI Act), including Practice Direction 2 – Preparation and Amendment of Designated Instruments. This is especially concerning due to the state-wide, national and international importance of the Adelaide Park Lands and City Layout.

The Community Engagement Charter (the Charter) is a key instrument under the PDI Act and provides for Code Amendments to be undertaken.

The Charter sets out 5 key principles (SPC, 2018, p.4):

1. Engagement is genuine
2. Engagement is inclusive and respectful
3. Engagement is fit for purpose
4. Engagement is informed and transparent
5. Engagement processes are reviewed and improved



The Charter emphasises that engagement should be focussed at the policy setting stage - it *“seeks to strengthen engagement up front in the development of planning policies, strategies and schemes, as it does not have a statutory role in the assessment of development applications”* (SPC, 2018, p.4).

Practice Direction 2 requires a designated entity (in this case, the CE of the Attorney-General’s Department) to prepare an Engagement Plan which meets the Principles and performance outcomes of the Charter. Upon completion of the Code Amendment the Designated Entity (CE of AGD) must provide a final engagement report to the Department to be “furnished on the Minister”.

We draw your attention to three critical shortcomings of both the process and analysis associated with the Code Amendment which highlight the extent to which the Code Amendment has not met its legislative requirements in state significant areas.

8.1 Engagement Timeframe

The 6 week timeframe provided by the Engagement Plan for feedback is inadequate, particularly considering:

- the State-wide importance of the Adelaide Park Lands and the need to provide sufficient opportunity for people to firstly become aware of the proposed changes,

and secondly to afford sufficient time for professional experts and lay-people alike to read, interpret and compose meaningful responses to the draft changes;

- Local Government responses (both City of Adelaide and adjoining LGAs) take time to prepare, and require endorsement from Council via public meetings, which are publicly notified and conducted within statutory processes and timeframes;
 - The City of Adelaide has engaged and coordinated the advice and/or submissions of the Adelaide Park Lands Authority, Reconciliation Committee and Council.
- Targeted, genuine and culturally appropriate consultation with the Traditional Owners, the Kaurna peoples must be undertaken prior to any decisions on the Code Amendment being finalised. Time and resourcing should be considered by the Attorney General’s Department – Planning and Land Use Services to support any consultation/s conducted.
- Community groups and individuals may need to coordinate a gathering or seek advice to further their understanding of the proposals, undertaken in addition to their existing commitments and responsibilities;
- Information updates during the engagement period require additional review by stakeholders to enable responses to be updated.

City of Adelaide wrote to the Attorney-General’s Department on 22 September 2021 requesting an extension of time, which was acknowledged in a response letter on 14 October 2021 noting the consultation period would not be extended.

8.2 Insufficient Documentation and Analysis

In addition, insufficient documentation was provided publicly to enable meaningful feedback on the proposed Code Amendment. The following critical information was omitted from the consultation materials:

- assessment tables (allocating policies from the Planning and Design Code to be applied to specific anticipated developments), were not included in the Code Amendment. Practice Direction 2 requires a draft Code Amendment to be supported by “(b) an explanation of the amendments to the Code policy proposed for the Affected Area”
- insufficient regard to the State Planning Policies in the drafting of the Code Amendment policies, such as:
 - Principles of Good Planning
 - Disregard for SPP 4 – Biodiversity
 - No consideration of the suite of policies contained within SPP 2 - Design Quality, such as SPP 2.2: “*Promote best practice in access and inclusion planning in the design of buildings and places by applying the principles of University Design, Crime Prevention through Environmental Design, and Access and Inclusion*”
 - lack of regard to other key SPPs including, but not limited to, Cultural Heritage and Climate Change.



8.3 Procedural Concerns

As outlined earlier the City of Adelaide wrote to the Attorney-General's Department early in the consultation period highlighting this missing information.

Whilst additional information was provided on 14 October, this supplementary information has not been publicly provided on the Planning Portal, nor have key stakeholders as documented in the Code Amendment's Engagement Plan been notified of these changes. This lack of transparency is inconsistent with Principle 4 of the Community Engagement Charter, namely that "Engagement is informed and transparent" because the public have not had access to the information, they need to enable them to fully understand the implications of the policy changes and provide informed suggestions and feedback. The principle of equal and transparent access to information has not been adhered to.

Additionally, one of the core objects of the new PDI Act is to "provides a scheme for community participation in relation to the initiation and development of planning policies and strategies"². In other words, the intent is to 'front-load' engagement in the policy 'setting' stage of the planning system, with less community engagement at the development assessment stage of the planning system. To meet this legislative object, it is critical that all information, reasonably required to understand the changes is provided for the entire consultation period.

In this Code Amendment process, the public have not had access to the Assessment Tables to understand what policies within the 4908 page Planning and Design Code will be used to assess the envisaged land uses within the area. Further, not all the envisaged land uses have been included in the amended Assessment Table 3 provided to Council on 14 October 2021.

With no public notification required for any development types within the Zones and Subzones proposed in the Code Amendment, detailing the policies that would be used to assess all the envisaged land uses should be provided at the 'policy setting' stage for comment by the public now. This would mean that the engagement at the 'policy setting' stage was genuine, inclusive and respectful. Without this information, the Code Amendment consultation materials are not fit for purpose and the public have not had the ability to be transparently informed about the potential future for this area.

With the above considerations, Council submits that the Code Amendment consultation has failed to meet the requirements of the Community Engagement Charter and therefore the Code Amendment should not proceed any further until the Community Engagement Charter has been properly and appropriately met.

Further, Council seeks the Minister for Planning initiate an independent review of the Community Engagement Charter processes and its effectiveness urgently with many Code Amendments now taking place, and the clear failings within this process.

² *Planning, Development and Infrastructure Act 2016 (SA)* s 12(1)(a).

9. PROPOSED RIVERBANK PRECINCT EXPANSION AND SUBZONES

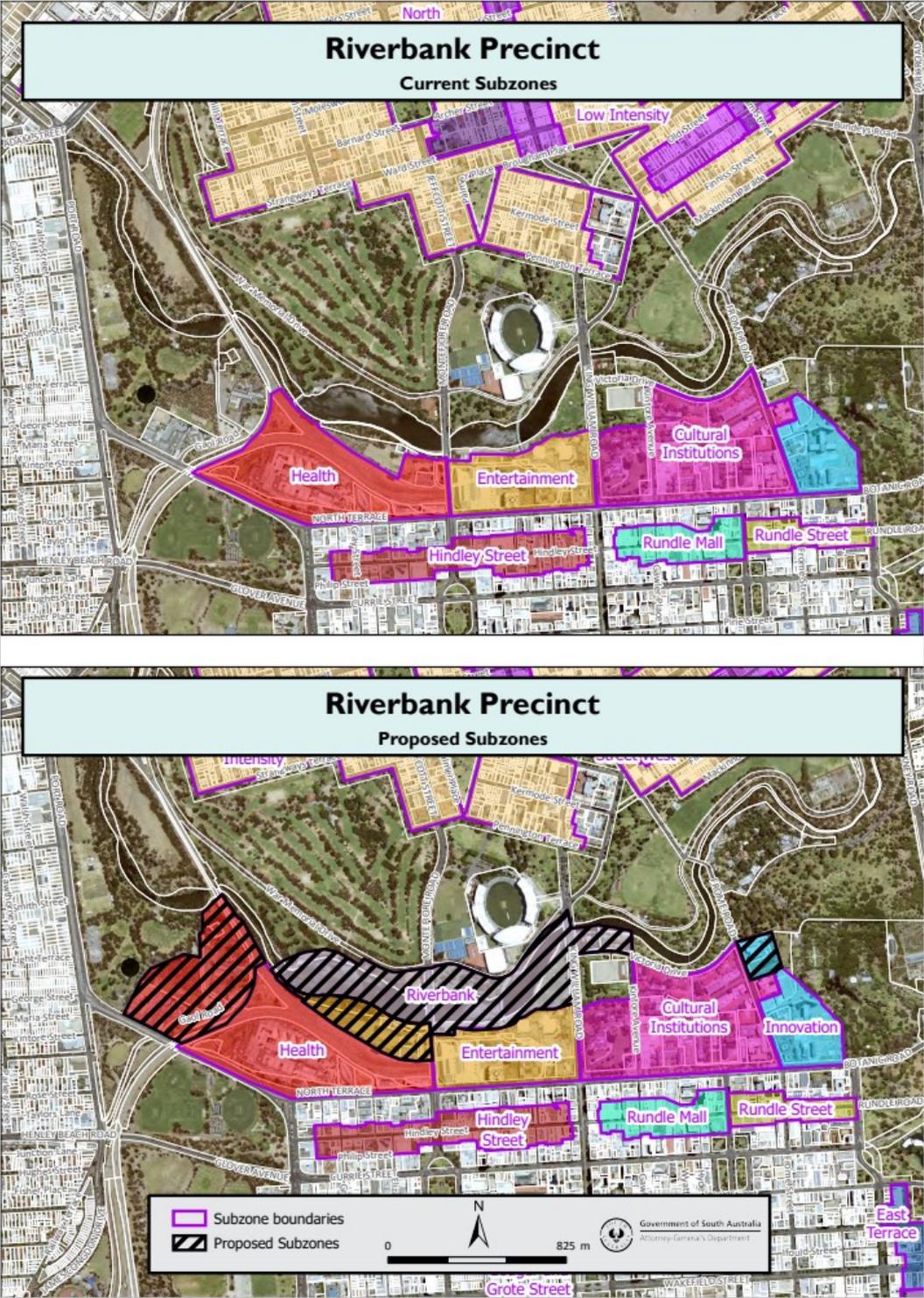


Figure 11: R. Attorney-General's Department, 'Planning for Adelaide's Riverbank Precinct'
 (Source: [Riverbank Precinct Code Amendment Current and proposed sub zones map](#), 15 September 2021)

9.1 Health Precinct

(Adelaide Park Lands Zone > City Riverbank Zone / Health Subzone)



Figure 12: Shaded area: Area proposed to be rezoned City Riverbank Zone and added to the Health Subzone.

(Source: Attorney-General's Department, 'Planning for Adelaide's Riverbank Precinct'

Supporting Materials: Brochure, page 7, 15 September 2021 [Planning for Adelaide's Riverbank Precinct](#))

The City of Adelaide does not oppose the location for the new Women's and Children's Hospital (W&C Hospital). However, the Code Amendment's proposed extension of the City Riverbank Zone / Health Subzone on to Kate Cocks Park (Park 27) allows for a commercial car park to be built in association with the new W&C Hospital, and potentially other commercial buildings, to a possible height of 15 building levels.

This area is the remaining open Park Lands space between the State Heritage sites of the Adelaide Gaol and the Police Barracks. Kate Cocks Park is first and foremost part of the Adelaide Park Lands. The additional built form that the Code Amendment would allow, is of such a scale that is at odds with the spirit and provisions of both the statutory principles in the APL Act and the Adelaide Park Lands Management Strategy.



Figure 13: SA Police Greys Horses under the Olive Grove Trees in Kate Cox Park (Park 27)

21 October 2021, (Source: City of Adelaide)

The proposed area of the extended Health Subzone does not provide any policies or vision to connect back to the core city. The proposed location for the new W&C Hospital is approximately 500m away from the north-west corner of the city and the proposed ‘transit hub’ within Kate Cocks Park (Park 27) is approximately 750m from the north-west corner of the city. Given this distance, it is unlikely that there will be much foot traffic back to the city, and therefore the broader economic benefit of this location for the new W&C Hospital will be negligible. In effect the development of this precinct, in conjunction with the potential development of a new arena in the Park Lands in the proposed expanded Entertainment Precinct has the potential to draw city visitors away from the core city and generate competition with existing CBD businesses.

Increases in trip potential in this precinct resulting from the policy proposals, which may involve a car park, adaptive reuse of heritage buildings and other commercial high-scale buildings could be significant, over and above the estimates for the new W&C Hospital. The impact on congestion, level of service and assets of the surrounding road network, including those under the care and control of Council needs to be considered.

Public transport access to this precinct is currently limited – with no tram, train or bus stops in proximity. Analysis of the walkable catchments for existing public transport stops should be undertaken to determine the accessibility of the site by public transport. The addition of new stops and/or services should be considered to service the precinct to improve accessibility and encourage people to access the precinct by public transport rather than private vehicle.

Gaol Road provides a key connection between the River Torrens Linear Path and the city – this is one of the few places that people on bikes can currently leave the Linear Path and easily access the city’s bike network, via shared paths on Port Road and West Terrace. More broadly Gaol Road provides a critical link in the longer bike connection between the Outer Harbour Greenway and the city, connecting people who live in Woodville, West Croydon and Bowden with safe, easy and fast access by bike into the Health Precinct and the city. This link is currently highly utilised by people riding bikes, both recreational and commuters. It is critical that the Gaol Road connection is retained in any development of the precinct, and if possible improved. Walking and cycling connections between the precinct and the surrounding Park Lands and city should be improved.

Emergency management needs to be carefully considered in this location also. Whilst locating the new W&C Hospital adjacent to the Royal Adelaide Hospital clearly has many benefits, there also needs to be careful planning in the event of an emergency. Locating two major hospitals adjacent to one another in the event of a natural disaster or other major event may have detrimental outcomes.

This precinct currently contains valuable natural community assets, such as natural connections along existing pedestrian and cycle linkages to nature play areas along the River Torrens and biodiversity gardens incorporating a bee hotel, constructed and planted with community input.



*Figure 14: Native Bee Hotel, Magic Forest Garden in the Bonython Park / Tulya Wardli (Park 27)
6 October 2021. (Source: City of Adelaide)*

The City of Adelaide has a Disability Action and Inclusion Plan (DAIP). This identifies getting around and to facilities as being critical for people with disability, ageing, and children. The Health Precinct is critical infrastructure for such groups and more frequent visitors. Access to the Adelaide Park Lands would be valuable to any hospital user and the proposed Code Amendment and new W&C Hospital Master Plan does not appear to value the health benefits of the Park Lands.

Bonython Park / Tulya Wardli is used frequently for events within the Park Lands, as such while this area remains unaffected by the Code Amendment, consideration needs to be given to what may be developed in areas adjacent on the Eastern side. Adding new stakeholders here may limit what is able to be presented in Bonython Park, which would be detrimental to the City - for example Bonython Park / Tulya Wardli is the number one venue of choice for concerts in the City. New tenants/businesses may take issue with concerts/noise/disturbance emanating from Bonython Park. This has been the case in some instances in the City previously and we need to ensure that Bonython Park can continue to be a premium event site for concerts and events.

For these reasons, **Council does not support any additional built form on Kate Cocks Park**. The State Government should consider alternative locations and design options to provide car parking to the proposed new W&C Hospital that does not include another incremental loss of the Adelaide Park Lands. There needs to be a vision for the Health Precinct that includes protecting the valuable green space that is the Park Lands, linking the precinct back to the city, and protecting Bonython Park / Tulya Wardli as a premium event site.

9.2 Entertainment Precinct

(Adelaide Park Lands Zone > City Riverbank Zone / Entertainment Subzone)



Figure 15: Shaded area: Area proposed to be rezoned City Riverbank Zone and added to Entertainment Subzone

(Source: Attorney-General's Department, 'Planning for Adelaide's Riverbank Precinct'

Supporting Materials: Brochure, page 8, 15 September 2021 [Planning for Adelaide's Riverbank Precinct](#))

The rezoning of the Adelaide Park Lands Zone to the City Riverbank Zone / Entertainment Subzone to Helen Mayo Park (Park 27) allows for an entertainment arena, residential, commercial and health developments. Helen Mayo Park (Park 27) is a slim stretch of green Park Lands re-created out of dis-used rail land. The proposed Entertainment Subzone provides a height guidance of 20 building levels, providing a transition down in scale toward the river, however no further guidance is provided as to an appropriate transition or the interface with the river. Getting this right will be particularly important given the narrowness of the site.

The City of Adelaide acknowledges that an arena, with active uses at ground level may be appropriate, but only if there is **no net loss of Park Lands**.

The finalisation of policies and zone boundaries with respect to this location, which may enable development of an arena, or similar, must take into account the impacts on the Park Lands, transport and access as well as safety, particularly if night-time events and liquor licenced venue(s) are anticipated. Policies will also need to address the interface with the existing (and proposed) hospital facilities within the adjacent Health Subzone.

The Park Lands play a very significant role in biodiversity provision and protection as well as reducing the impacts of the urban heat island effect. This part of the Park Lands contains several significant trees and vegetation that are key to the biodiversity and ecological connectivity (corridors) of the Park Lands. As discussed earlier hollow-bearing trees (that are used for nesting) cannot be replaced by revegetation projects surrounding new built form. Planting new trees will not provide the ecological services of a single 100+ year-old tree – at least not for several decades. Further, increasing built form at the expense of established vegetation can significantly impact on the movement of genetic material and impact on the role that the Park Lands play in reducing the Urban Heat Island effect.

Current access to this precinct is very constrained and the arrangements for future access, with an increased demand for movement, are not clear. The proposed changes to this precinct has the ability to significantly alter transport demands in the local area and more broadly across the city, particularly during event times if the Riverbank Arena is approved at this location.

Currently, if events are held at Adelaide Oval, there are significant road closures, such as King William Road, that are required to be in place to assist with the significant people movement through this area. If an arena were to be built in the proposed entertainment precinct, it is likely that Montefiore Road would need to be closed during an event for people management. Therefore, if events were on concurrently at Adelaide Oval and the new arena, both King William Road and Montefiore Road would need to be temporarily closed which would leave the only city connection to North Adelaide via Frome Road.

Any increase in demand for vehicle access, including a car park or drop-off, or increases in demand for access on foot or by bike will require considerable thought. Engagement with Adelaide Metro will be required to ascertain train, tram and bus abilities with this additional capacity increase to this area.



*Figure 16: Linear Path adjacent to River Torrens / Karrawirra Pari Helen Mayo Park (Park 27)
21 October 2021, (Source: City of Adelaide)*

The existing Linear Path and connecting paths to Montefiore Road are very well utilised by people walking and riding bikes at all times of day/year. However, with the introduction of policies enabling the development of a 15,000 (or more) capacity arena, the implications of these additional people in this location needs careful consideration. If an emergency evacuation was required, the land is currently land locked between the railway lines and

river. It will be critical that there is a pathway adjacent the River Torrens / Karrawirra Pari that is a suitable width to accommodate the significant walking and bicycle movements that occur each day, as well as potential emergency evacuation requirements. There is an opportunity to improve the level of service and safety for path users through this precinct. This will require additional infrastructure being put in place, such as lighting and CCTV. Consultation with SAPOL for managing the impacts of another entertainment area will be critical.

Investigations of innovative ways to provide city green space, and minimise loss of existing significant biodiversity, should be undertaken to determine whether any design aspects may be appropriate in this location and can result no net loss of Park Lands.

Options that may be able to provide for development over the railway lines in this area, to provide a new recreational space (similar to the New York High Line (see Figure 17)) as a means to ensuring no net loss of Park Lands to the people of South Australia.



Figure 17: Section of The High Line, New York www.thehighline.org
(Source: Photographer: Iwan Baan Iwan Baan | The High Line)

9.3 Innovation Subzone

(Adelaide Park Lands Zone > City Riverbank Zone / Innovation Subzone)



Figure 18: Area proposed to be rezoned City Riverbank Zone and added to the Innovation Subzone.

(Source: Attorney-General's Department, 'Planning for Adelaide's Riverbank Precinct'

Supporting Materials: Brochure, page 10, 15 September 2021 [Planning for Adelaide's Riverbank Precinct](#))

Frome Park / Nellie Raminyemmerin, between the new Botanic High School and the Lot Fourteen site, was reclaimed as public green space from an old car park in the late 1990s. It forms a valuable green space connection to the Botanic Garden, is used for WOMADelaide and other events and contains a little known, but highly significant site for Kaurna.



Frome Park in 1997 when used for car parking

Frome Park in 2021: reclaimed park land

Figure 19: Comparative aerial photographs of Frome Park area in 1997 and 2021

The area is also near the known grey headed flying-fox habitat, which may be detrimentally impacted by any further development in this location.

There has been no valid reason given for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone - Innovation Subzone, however the rezoning puts Frome Park / Nellie Raminyemmerin at risk as it enables the transition from open green space to an ancillary area for Lot Fourteen and Botanic High School.

Botanic High School has existing land use rights and if the intent is to retain Frome Park /Nellie Raminyemmerin as an open space link between the University of Adelaide and the Adelaide Botanic Garden there is no need to rezone this area.

The City of Adelaide does not support the extension of the Innovation Subzone to the proposed location and requests that it remain within the more appropriate Adelaide Park Lands Zone. The inclusion of Frome Park / Nellie Raminyemmerin as a designated open space link between Frome Road and the Adelaide Botanic Garden on a Concept Plan within the Adelaide Park Lands Zone to further reinforce the importance of this area would be supported.

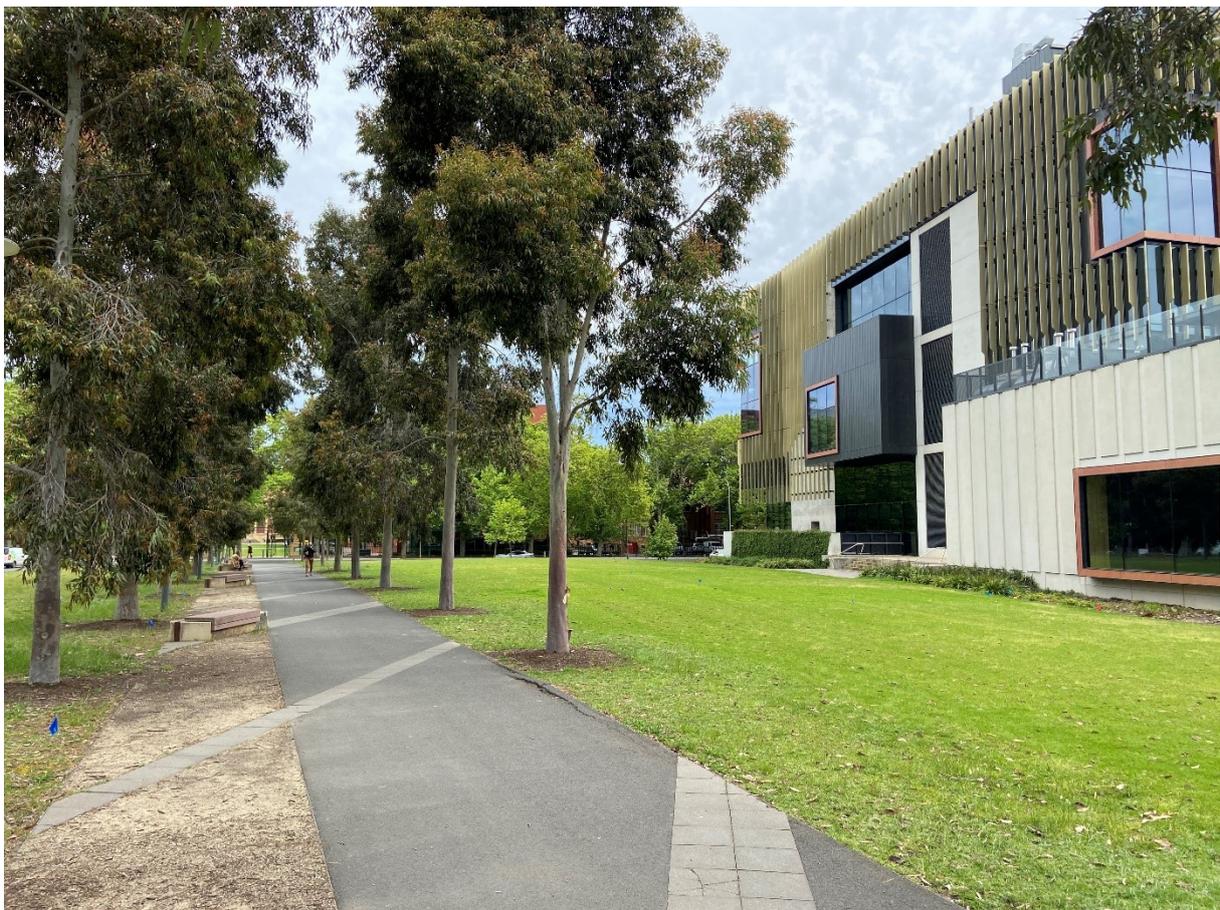


Figure 20: Frome Park / Nellie Raminyemmerin (Park 11, Adelaide Park Lands)

Shaded pedestrian path connecting The University of Adelaide and Adelaide Botanic Garden, and providing green space between Adelaide Botanic High School and Lot Fourteen

20 October 2021 (Source: City of Adelaide)

9.4 Riverbank Subzone

(Adelaide Park Lands Zone (no Subzone) > Adelaide Park Lands Zone / Riverbank Subzone)



Figure 21: Shaded area: Area proposed to apply Adelaide Park Lands Zone's new Riverbank Subzone.

(Source: Attorney-General's Department, 'Planning for Adelaide's Riverbank Precinct'

Supporting Materials: Brochure, page 13, 15 September 2021 [Planning for Adelaide's Riverbank Precinct](#))

The proposed Riverbank Subzone within the existing Adelaide Park Lands Zone covers around 37 hectares over the River Torrens/ Karrowirra Pari and the north and south banks of the Adelaide Park Lands. The rationale given for the proposed Subzone is to enable greater built form and activation on and adjacent the River Torrens / Karrowirra Pari.

The City of Adelaide facilitates many large and small events in Elder Park, Pinky Flat, Barr Smith Walk and elsewhere each year, making the Riverbank an already well activated site. Prior to Covid-19 restrictions, in 2018/19 Council facilitated 27 events in Elder Park/Riverbank and 11 at Pinky Flat. These sites are 'premium' event sites, with events such as Adelaide Festival utilising the space for 2 months over the summer period. Whilst event numbers have reduced since the start of 2020 due to the COVID-19 pandemic, several events are still being planned into 2022.



*Figure 22: Lounders Boatshed Café in Elder Park, alongside the river
21 October 2021, (Source: City of Adelaide)*

In regard to built form within the proposed Riverbank Subzone area, the City of Adelaide leases several buildings, some former boat sheds converted to cafes or restaurants as well as those still being used as boat sheds. These buildings, or buildings within these locations, date back a hundred years. Adding new built form for commercial land uses within this area may limit what is able to be presented in Elder Park as new tenants or business operators may take issue with concerts/noise emanating from Elder Park. While it can bring benefit having additional businesses in the area, we need to ensure Elder Park can still remain a premium event location.

Furthermore, whilst City of Adelaide facilitates a number of events and temporary activations along the Riverbank each year, increasing permanent built form and development will have significant implications for access, parking provision and impacts on and integration with existing pathways and services within the precinct.

If activation is the core reason for this proposed Subzone, the City of Adelaide submits that events, activation, business opportunities and more can occur under the existing planning provisions of the Adelaide Park Lands Zone. Therefore, the City of Adelaide does not support the introduction of the Riverbank Subzone.

In addition, the area affected by the proposed Riverbank Subzone is of very high cultural and environmental significance, that warrants protection from the extent of development anticipated in the Riverbank Subzone. In particular:

- It is well understood that the River Torrens / Karrawirra Pari is of great significance to Kurna, particularly Pinky Flat and the adjacent Adelaide Oval area which, together, formed an important camp site and corroboree ground. For this reason, the northern banks of the River Torrens should be respected and left free from permanent built form

- The subject area as park lands and the Torrens Lake provides unique views and vistas that are important to Adelaide and enjoyed from many vantage points around the area.
- Additional built form over the Park Lands will be steps further away from creating ideal habitats for the native species we aim to conserve and attract to the Park Lands.
- Additional built form and canopy loss in the Park Lands will negatively impact on the important cooling effect of the Park Lands.
- That this area is within the floodplain, with the risk of flooding likely to be exacerbated with climate change predictions of more intense and frequent rain events.
- In-line wetlands are currently proposed in Torrens Lake in order to address water quality and ecological concerns. The proposed rezoning is not compatible with this project.
- there is a lack of clarity about the term 'on-water development'. Any changes to the Adelaide Park Lands Zone should facilitate 'naturalisation' and incorporation of water quality and ecological objectives and requirements.

Policies that recognise the importance and historical significance of Elder Park and Pinky Flat and seek to preserve them as open spaces for events and community use are supported to be included in the Adelaide Park Lands Zone.

The City of Adelaide submits that the banks of the River Torrens are already significantly activated with events through the current Zoning. The subject area of the proposed Riverbank Subzone is of great significance to Kaurna. Further, the area provides unique views and vistas, is an important habitat that we try to conserve. For these reasons, the City of Adelaide does not support the Riverbank Subzone.

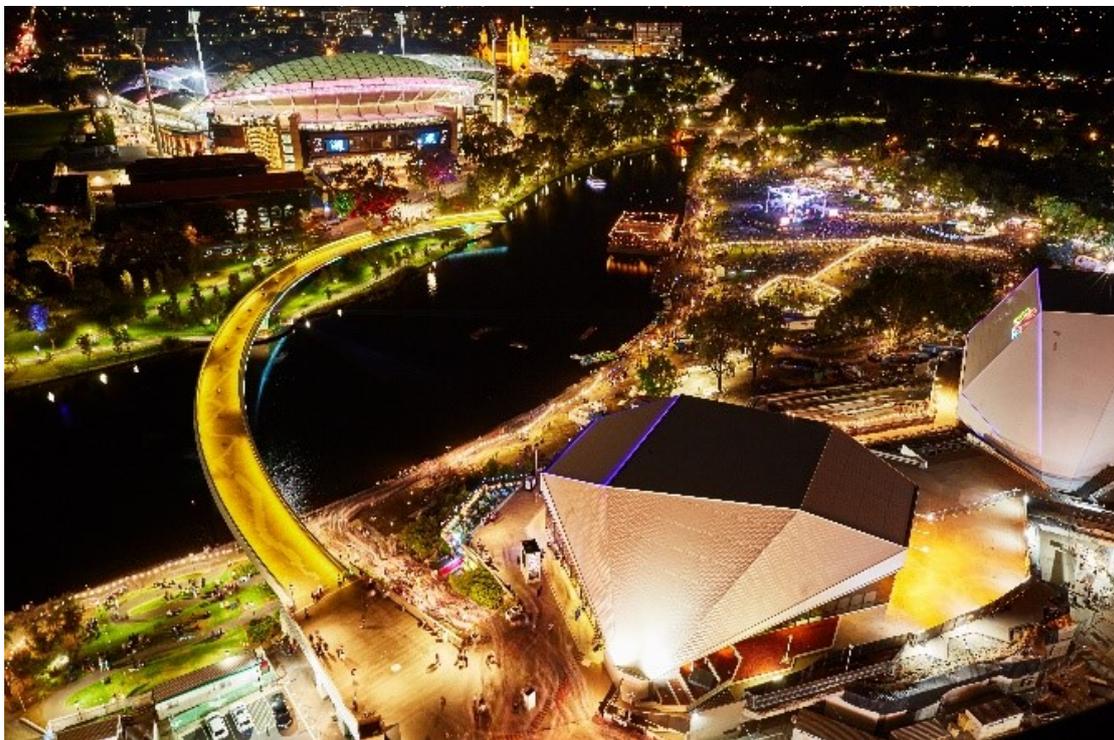


Figure 23: The Riverbank Zone on New Years Eve, 2017.

(Source: City of Adelaide)

10. SUMMARY AND RECOMMENDATIONS

The City of Adelaide does not support the Riverbank Precinct Code Amendment.

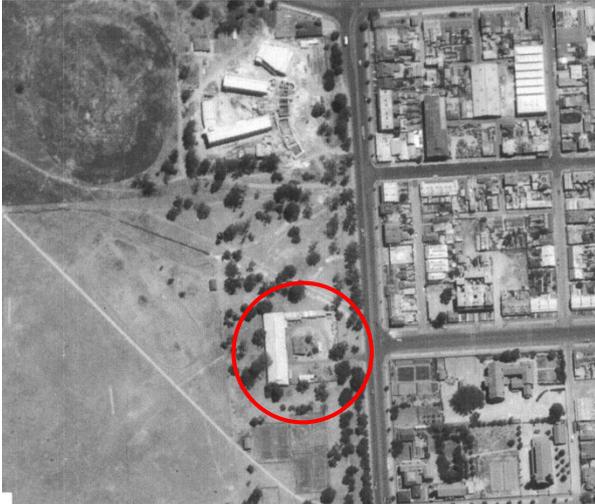
The lack of investigations undertaken by the designated entity in the preparation of the Code Amendment, including the missed opportunity to genuinely engage with the City of Adelaide and Kaurua community who have substantial knowledge and expertise of the areas has meant that the context and significant importance of the land proposed to be rezoned has not been fully understood.

This has been demonstrated in the limited assessment and review of the proposed policy changes against all of the relevant State Planning Policies, contrary to the requirements of the *Planning, Development and Infrastructure Act 2016*. As well as a lack detail provided to exemplify an understanding or the complex considerations of the locality.

In addition, the nature and extent of the community engagement undertaken is inadequate to enable genuine consideration and feedback to be provided by all affected stakeholders.

The City of Adelaide supports appropriate public infrastructure and strategic development of the Riverbank Precinct that will enhance the social, economic and environmental values, however in the absence of a current Master Plan it is premature to undertake policy change.

Examples of areas returned to Adelaide Park Lands and rehabilitated into green space.



Park 24 in 1949. Compound and depot circled.

September 2021 with area returned to park land

Figure 24: Comparative aerial photographs of Ellis Park / Tampawardli (Park 24) at the end of Franklin Street in 1949 and 2021. The 1856 Post and Telegraph Station, later the Post Master General’s compound and transport depot, was demolished in 1987 and returned to Park Lands.



*Figure 25: Location of the former Signals Station, Post and Telegraph site in Park 24
(Source: [45-03 Signals Station – Post and Telegraph site | Adelaide City Explorer](#))*



Rundle Park in 1949. Sewers & Waterworks site circled and in April 2021 with area returned to park land

Figure 26: Comparative aerial photographs of Rundle Park / Kadlitpina (Park 13) in 1949 and 2021. The 1879 Sewers and Waterworks were demolished in 1984 and returned to Park Lands. In 1996 this native garden was formalised as the Peace and Friendship Garden.



2009: SA Water Thebarton Depot

2021: Narnungga Urban Forest (Park 25)

Figure 27: Comparative aerial photographs of Gladys Elphick Park / Narnungga (Park 25)

The area in the triangle was previously the site of the SA Water Thebarton Depot, returned to the Park Lands and transformed into Narnungga Urban Forest in 2011-12.

Copy of MP Submissions Received

Rachel Sanderson MP

Good afternoon

Please find attached the submission to the Riverbank Precinct Code Amendment from the Hon Rachel Sanderson MP, State Member for Adelaide.

Kind regards



Office of Rachel Sanderson MP

State Member for Adelaide

Minister for Child Protection

84 Prospect Road PROSPECT SA 5082

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 please consider the environment before printing this email



Hon. Rachel Sanderson MP

State Member for Adelaide



27 October 2021

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[@AdelaideMP](https://twitter.com/AdelaideMP)

SUBMISSION TO CONSULTATION REGARDING THE RIVERBANK PRECINCT CODE AMENDMENT

As the State Member for Adelaide, I write on behalf of constituents who have contacted me in relation to the proposal to re-zone sections of land adjacent the River Torrens.

01 – Health and Biomedical Precinct

While many constituents noted the need to co-locate the Women's and Children's Hospital (WCH) next to the Royal Adelaide Hospital (RAH), many were extremely concerned about the inclusion of the SAPOL Barracks, Old Adelaide Gaol and the heritage olive grove in the re-zoning proposal.

It has been publicised that there is consideration of a carpark for the new WCH to be located on the site of the current olive grove. Many people who contacted me about the Code Amendment were particularly concerned about the loss of green space and established trees and recommended that parking be considered elsewhere, either over the rail lines or underneath the new WCH.

02 – The Entertainment Precinct

Constituents noted that it would be preferable for only the portion of the land to be used for the Riverbank Arena to be re-zoned and the remaining areas of Helen Mayo Park remain as Adelaide Park Land zone and no sub-zoning applied.

03 – The Innovation Precinct

It is clear that inclusion of the Adelaide Botanic High School into the Innovation Precinct would be beneficial, however, many constituents were extremely concerned that 'Frome Park'/Nellie Raminyemmerin Park would be re-zoned as well.

It was raised by one constituent that the site of 'Frome Park' has several traits that are in contradiction to the move to re-zone the site. These were:

1. The area is extensively contaminated and, under current regulations, the site cannot be disturbed unless extensive works are undertaken to remove the 1.5m deep contamination across the majority of the park.
2. The site has a fully authenticated and documented Kurna Aboriginal burial site with the remains retained in place and capped. It is listed on the Register of Aboriginal Sites and Objects under the *Aboriginal Heritage Act 1988* and therefore the site cannot be disturbed.
3. The site is the only access to the western side of the Botanic Gardens and is used for WOMADelaide and other events.

For these reasons, constituents communicated their opinion that there is no need to re-zone this area due to the extensive restrictions on the use of the land. Constituents would prefer if its zoning remained as it currently is.

04 – The Active Waterfront Precinct

Many constituents contacted me with serious concerns about the re-zoning of this section, particularly sections that are north of the River Torrens.

The bulk of the correspondence from constituents was in relation to the proposed re-zoning of the sections north of the River and the majority were not in favour.

One of the concerns raised is that the present site does not attract many patrons and therefore doesn't need further development of cafes and restaurants as there is not enough patronage to support new businesses.

The loss of open public space at Pinky Flat was mentioned extensively by constituents. Many note that Pinky Flat offers greenery and putting development on this side of the River will not be of much benefit. Similarly point above, there are already cafés located north the River that are adjacent Pinky Flat. Venues at Next Generation Sports Club and Adelaide Oval are already established.

There are no current plans for development on Pinky Flat and the proposal to add sub-zoning has meant that many have communicated their concerns about possible developments on the site. Concerns were raised that there is no need for a zone change as the area is already often activated, for example, the Oz Asia Festival, Moon Lantern Trail and previous Fringe events that have been held on both sides of the River.

Another concern raised was that the addition of sub-zoning under the 'Adelaide Park Lands' zoning for this area would effectively dismantle the 'Figure of 8' for the Park Lands. This type of open green space is the only type in the world – other cities effectively only have a ring, and not a figure of eight of open green space.

Further concerns were raised by constituents in relation to Indigenous burial sites which are documented along the Riverbank and that these may be disrupted with development allowed under this re-zoning.

General Comments and Concerns

Many people who contacted me highlighted the following general concerns in relation to re-zoning the area.

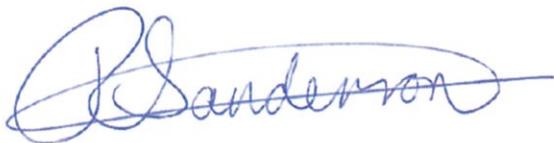
It was identified that re-zoning may jeopardise bids for World Heritage Listing, existing awards of National Heritage Listing and the like. In addition, it may jeopardise the bid for Adelaide to become a National Park City. Contrasts were raised by many in relation to London, New York and Paris where open public space is maintained as an attraction for visitors and city-dwellers alike.

Many raised that future development to be allowed under the new zones and sub-zones will remove open green space and remove established greenery. It is documented that green spaces and established greenery assists in reducing pollution and absorbs heat during hot days. Many constituents were concerned about the impact of the loss of green space in relation to Climate Change in particular. Others raised their concerns about reducing liveability in a time where open space has had heightened importance after the COVID-19 pandemic and lockdowns.

There were many responses that highlighted the area as a whole is of significant importance to the Kurna people.

I would request on behalf of all residents who have raised their concerns with me that these comments and concerns be considered and addressed as part of the consultation process.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'R Sanderson', with a large, stylized flourish at the end.

Hon Rachel Sanderson MP
State Member for Adelaide

Copy of PUBLIC Submissions Received

A Harty	Andrew Phillips	Anthea Taylor
Aaron Malcolm Gray	Andrew Robertson	Anthony Durkin
Aaron Parker	Andrew Stock	Anthony Laube
Abby	Andrew Taylor	Anthony Moore
Adam Murch	Andrew Telfer	Anthony Thomas AC
Adrian Jackson	Andrew Tidemann	Ash McInnes
Ajinder Singh	Andrew Wilkinson	Ashleigh and Rob Younger
Alan Tucker	Angela Menadue	Ashleigh Ryan
Alastair Hunter	Angus Brosnan	Augusta Soteriou
Alex Bradbury	Angus Wallace	Bailey Underwood
Alex Watson	Ann Doolette	Barbara Ludwig
Alexander Wilkinson	Ann Lee	Barry Westin
Alexandra Mannarino	Ann O'Connor	Beck Hoffmann
Alexis Bennett	Ann Schwartz	Becky Llewellyn
Ali Fiske	Ann Sherwell	Belinda Sheldrick
Alison Joseph	Ann Weedall	Ben Ayriss
Alison Smedley	Anna Greaves	Ben Smith
Alison Wood	Anna Leslie	Ben Taylor
Allyson Carpenter	Anne Ballard	Benjamin James
Amy Hulsinga	Anne Gayler	Bernadette Reilly
Amy Martin	Anne Hunt	Bernard Flaherty
Anabella Gigli	Anne Kirk	Bernard O'Neil
Andrew Cannon	Anne Knight	Beth Newman
Andrew Dyson (Kensington Residents' Association)	Anne Monceaux	Beverley Paine
Andrew Hill	Anne Wharton	Bill Prior
Andrew Macintyre	Anne-Marie Meegan	Bjoern Malessa
Andrew McKay	Annie Hastwell	Bonnie Claassen
	Anonymous	Bradley Barrett

Brian Bailie	Chris Ramsden	David Cruickshanks Boyd (5049 Coastal Community Association)
Bridget Price	Chris Taras	David Gomer
Briony Hunt	Chris Thompson	David Grybowski
Briony Hunt	Chris Vounasis	David Jones
Briony Pearce	Chris Wellington	David Ladd
Bronwyn Bentley	Chris Wiley	David Lewis
Bruce Nielsen	Christine Braham	David Monceaux
Cam Longshaw	Christine Francis	David Morgan
Carl Purcell	Christine Pyman	David Ness
Carlsa J Carter	Christine Reid	David Parsons
Carol Bailey	Christopher Rann	David Paull
Carol Faulkner	Christopher Stabolidis	David Rathman
Caroline Chapman	Cliff Flower	David Shannon
Caroline Johnson	Colin Rogers	David Whitten
Caroline Smith	Dale Bagshaw	Dean Philp
Carolyn Markey	Damaris Sheldon	Dean Rowe
Carrol Roberts (Stansbury Museum)	Damien Mugavin	Deane Butcher
Cate Rounsefell	Damien Simmons	Deane Kemp
Catherine	Dan Dunbridge	Deborah Moran
Catherine McMahon	Daniel Gannon (Property Council of Australia)	Demetrios (Jim) Bastiras
Cathi Tucker	Daniel Mabarrack	Denise Moss
Chantal Wiles	Daniel Marx	Denise Wangel
Charles Gilchrist	Daniel Minther (ARTC)	Diane Campbell
Charlotte Hutchesson	Daniel Patingale	Diane Griffin
Charlotte Hy	Daniella Nofi	Dinali Devasagayam
Charlotte Newsome	Darren Peacock (National Trust of South Australia)	Don Murchison
Chris Carrand	Darryl Carpenter	Don Richards
Chris Harris	David Andrewartha	Dr Christina Jarvis
Chris Lloyd		

Dr David Faber	Elizabeth McLeay	Geoffrey Goode
Dr Elizabeth Hotham & Mr Neil Hotham	Elizabeth Rushbrook	Georgia de Lacy
Dr Gillian Dooley (History Council of SA)	Elizabeth Vines	Georgia Meros (Australia ICOMOS)
Dr Ingrid Wangel	Elka Gale	Gerasimos Patitsas
Dr Iris Iwanicki	Elle Vallance	Gillian Dooley
Dr Iris Iwanicki (Community Alliance SA Inc)	Emily Toome	Gillian Saunders
Dr Jennifer Gardner OAM	Emily Winter	Glenyss Steedman
Dr Margaret Furness	Erin Dockrey	Gloria Rainford
Dr Meredith Kaesehagen	Fay Williams	Gordon Ure
Dr Michael Llewellyn Smith AM	Felicia Rasheed	Greg Biddolph
Dr Philip Nicholls	Felicia Whittaker	Greg Lamey
Dr Sharon Mosler	Felicity Sando	Greg Packer
Duncan Crouch	Fiona MacDonald	Gregory Crawford
Dzhoel Drake	Fran Whittingham	Gunta Groves
Edmund Feary	Francene Connor	Hannah Beinke
Elar Kraav	Frances Anderson	Heather Moyes
Elbert Brooks	Francesco Dizazzo	Heather Nott
Elbert Brooks (The North Adelaide Society Inc)	Frank Brown	Heather Smith
Elisa Toome	Frank Nicholson	Heather Smith
Elise Myatt	Fred Mann	Helen Mitchard
Elise Russell	Freya Davies	Hilary Rowe
Elizabeth Crisp (Prospect Residents Association)	Freya Higgins Desbiolles	Hilda and Ron Smith
Elizabeth Farrant	Gael Fraser	Hodges and Linkevics Families
Elizabeth Finck	Garry Morrison	Holly Taylor
Elizabeth Ho	Gaura Bale	Ian & Jeanette Hordacre
	Gavin Bowden	Ian Buckland
	Gavin Trott	Ian Gibbins
	Gemma Hutchinson	
	Geof Nairn	

Ian Horne (Australian Hotels Association (SA))	Jason Goncalves Da Costa	John McCarthy
Ian Milroy and Barbara Mullan	Jean John	John Pockett
Ian Radbone	Jeanne Hurrell	John Turnbull
Ian Rhodes	Jenni Boyle	Jonathan Harry
Ian Stratford	Jennie Wilkinson (Committee for Adelaide)	Jonathan Richer
Ingrid Faber	Jennifer Bandick	Jonathan Wenberg
Ingrid Kellenbach	Jennifer Stokes	Josephine Mercer
Isabella Slevin	Jenny Allport	Jude Scarborough
Ivan Lloyd	Jenny Gallas	Judith Francis
Jack O'Dea	Jenny Pearce	Judith Knott
Jackson Farrow	Jenny Weaver	Judith Thomas
Jae Dalglish	Jesse Coleman	Judy Fander
James Baker	Jessica Lawson	Judy Parham
James Daly	Jill Amery	Judy Rees
James Hughes	Jill Bowden	Judy Thain
Jan Cornish	Jill Cooke	Julia Langrehr
Jane Bailey	Jillian Dellit	Julia Miller
Jane Copeland	Jo Gebhardt	Julie Bennett
Jane Edwards	Jo Seretis	Julie Chamberlain
Jane Lomax-Smith	Joanna Wells	Julie Myers
Jane Mitchell	Joanne Brougham	Julienne Lenain
Jane Paterson	Joanne Thredgold	Justin Ross (Riverside Rowing Club)
Jane Rossetto	John Bridgland	Kalyna Micenko
Janet Boon	John Brown	Karen Griffiths
Janet Scott	John Davidson	Karen Shand
Janet Southern	John Eyre	Kate Elmes
Janice Gamble	John High	Kate Elmes
Jasmin Neophytou	John Lattin	Kate Lawrence
	John Mancheff	Kate Treloar

Katherine Dennis	Leah Kermode	Lyndall Kay
Katherine Grocott	Leanne Prior	Lynette Bacchus
Kathryn Anderson	Leanne Turnley	Lynette Holmes
Katreena Wiszniewski	Lee Lee	Maggie Fletcher
Kay Anderton	Leslie Howard	Mandy Cannon
Kay Hannaford	Lewis Owens	Marcus Beresford
Keith John Rennie	Liam Hanna	Marcus Spronk
Kerry Hallett	Libby Ottaway	Maree Creevy
Kerry Reed	Liesbeth Pockett	Marg Hill
Kerry Thorn	Lisa Allison	Marg Martin
Kerry Watson	Lisa Laycock	Margaret
Kevin O'Leary	Lisa Maeorg	Margaret Allen
Kim Becker	Lisa Schuyler	Margaret Low
Kim Woods	Liz Harfull	Margaret Stratton
Kirin Moat	Liz Traeger & Dennis Dale	Margaret Whelan
Kirstie Murch	Lois Watson	Margie Medlin
Kurt Florimond	Lorraine Rogers	Margot Ayres
Kylie Hood	Lorraine Coomans	Marguerite Leggett
Kym Angerson	Louise Bywaters	Maria Johns
Lachlan Haig	Louise Drummond	Maria Lease
Laraine Ruthborn	Louise Handley	Marian Wicks
Laura	Louise Warin	Marina Duffie
Laura Oneil	Lucy Hood	Marjon Martin
Laura Pieraccini (Residents for Environment and Character Conservation)	Lucy Macdonald	Mark Gishen
	Luke Watson	Mark Matthews
	Lyn Gale	Mark Parnell
Laura Watson	Lyn Hawker	Mark Russell
Lauren Buchanan	Lynda Yates	Martijn Van der Merwe
Lazaras Panayiotou	Lyndal Govey	Mary Chapman

Mary Hood	Michelle Dicker	Patricia Sumerling
Mary Isabel Storer	Mick Telstra	Patrick G Harvey
Mary Richardson	Miriam Hobson	Patrick Moran
Mary Rumbold	Mr D Clarke	Paul Anderson
Matthew Linn	Mrs J Johns	Paul Bulley
Matthew van Giesen	Naomi Doolette	Paul Cudmore
Matthew Wright Simon	Natale Rudland Wood	Paul Duggan
Maureen Joyce	Nathaly Fiallo	Paul Laris
Maurice Crotti	Nathan Cunningham	Paul Turner
Max Harris	Neal Starkey	Pauline McLean
Max Thomas	Nicholas Lawry	Pauline Muir
Maxine Gibbs	Nick Patrick	Pauline Payne
May Bourne	Nicky Page	Peggy Brock
Meliesa Judge	Nicole Flaherty	Penelope Shorne
Melinda Fraser	Nigel Doyle	Penny Wilkinson
Melissa Ballantyne	Nitai Bale	Penny Wilkinson
Meredith Harrison	Norma Carter	(Adelaide Gaol Preservation Society Inc. (AGPS))
Meredith Ide	Norman Etherington	
Mia Hamilton	Norman Weedall	Persia Janzen
Michael Burden	Nynke van der Burg	Peta Conor
Michael Cornish	Oliver Bull	Peter
Michael Evans	Oliver Frank	Peter Adamson
Michael Flaherty	Orlanda Mazzei	Peter Bolton
Michael Hallam	Owen Mace	Peter Bradshaw
Michael Ladd	Pam DiLorenzo	Peter Byrne
Michael Phillips	Pam O'Donnell	Peter Chataway
Michael Pilkington	Pat Wundersitz	Peter Croft
Michael Weightman	Patricia Harvey	Peter Harrison
Michele Slatter	Patricia Michell	Peter Klaosen

Peter Lamb	Richard Twidale	Ruth Russell
Peter Langhans	Richard Webb	Ruth Sims
Peter Lowe	Rita Smith	Ruth Zanker
Peter Nicholls	Rob Cheesman	Sally & Alistair McHenry
Peter Whittaker	Rob Younger	Sally Armstrong
Philip Ekers	Robbie Porter	Sally McLean
Philip Groves	Robert Bartsch	Sally Northwood
Philippe Quoilin	Robert Bauze	Saloni Gadhia
Phillip Tann	Robert Farnan	Sam Harris
Phoebe Azer	Robert Pontifex AM	Samantha Buxton Stewart
Prof Sabine Dittmann (Royal Society of South Australia Inc.)	Robert Prowse	Samuel Pring
Prue Aitken	Robert Riggs	Samuel Wittwer
Prue McElwain	Robert Wishart	Sandra Hilbert
Rachel Stark	Robin Donaldson	Sandra Turner
Rachel Stone	Robyn Byrne	Sarah Kroemer
Rachel Thamm	Roderick Lovibond	Sarah Schmidt
Rae O'Connell	Rodney deHoedt	Sarah Tyson
Ralph Clarke	Roma Schiller	Shane Potter
Ravennat12	Rosalie Day	Shane Sody
Ray Walter	Rosanna Taylor	Shane Sody (Adelaide Park Lands Association)
Rebecca Beasley	Rosemary Coates	Sharon Young
Rebecca Faulkner	Rosemary Hallam	Shaun de Bruyn (Tourism Industry Council South Australia)
Rebecca Wenzel	Rosemary Luke	Sigrid Malessa
Regina Thomas	Rosina Possingham	Silva Larson
Rhiannon Davids	Roslyn Islip	Simon Carless
Richard & Claire Turnbull	Rupa3	Simon Healy
Richard Pomfret	Russell Finney	Simon Tait
Richard Ruffin	Russell Sayers	
	Russell Talbot	

Skye Krichauff	Suzie Bourne	Vedat Erdem
Skye MacDonald	Suzie McCusker	Venita Weir
Sonja Pappagallo	Suzie Moss	Vicki Heinrich
Stacey Thomas	Sylvia White	Vicky Chartres
Stephanie Johnston	Taliesin Attrill	Violet May Rowe
Stephanie Noble	Ted Jennings	Virginia Munro Viviana
Stephen Francis Larkins	Tess Crotti	Nunez Zeballos Garcia
Steve Trabilsie	Tessa Price Brooks	Wai Cheong
Steven Oppes	Thomas Wright	Wendy Campbell
Steven Parker	Tiffany Bolton	Wendy Egan
Stewart Roper	Tim Gunn	Wendy Fuller
Stewart Sweeney	Tim Marriage	Wendy Wright Wilfrid
Stuart Gifford	Tim Rettig	Prest AM William &
Sue Fiedler	Tim Walsh	Kerry Wood Wilson
Sue Giles	Toby Brandenburg	Feltus YiZhong Zhuang
Sue Hammill	Tom Chladek (Botanic Gardens and State Herbarium)	Yuri Poetzl
Sue Lang		Yvette van Berkel
Susan Brame	Tony Curtis	Yvette van Eenennaam (Adelaide BioMed City)
Susan Collins (Chair, South West City Community Association Inc)	Tony Leviston	Zis Ginos
Susan Marsden	Tracey Shorter Davies	Kurna Yerta
Susan O'Neill	Tricia Rabbitt	Aboriginal Corporation
Susan Rennison	Trish Russell	RNTBA
Susan Rooney Harding	Tristan Avella-O'Brien	
Susan Schott	Tsun Wu	
Suzanne Gebhardt	Valdis Dunis	
	Vashti Janzen	

A Harty



"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource."

Aaron Malcolm Gray

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Aaron Malcolm

Family name: Gray

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: See attached submission

Attachment: ADLsubmission.pdf, type application/pdf, 56.9 KB

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sent to proponent email: plansasubmissions@sa.gov.au

“Please note my opposition to any land clearance of the Adelaide Parklands for present purposes.

Indigenous consideration

1. The land presently is of spiritual importance of the Kurna people. Further land clearance and development disregards the spiritual connection with land, form, trees of an ancient people. Has not enough desecration of land and form already occurred within the metropolitan area of traditional lands of these Aboriginal people?

Historic design

2. The Parklands were created for purpose and present as a green belt of land of the Capital city. Encroachment by land clearance forgoes landscape forever without any known environmental offset.

Existing CBD availability

3. The city already evinces significant vacancies of commercial office space and under utilisation of existing carparks and degraded and aged commercial buildings of the last forty years. Land clearance is a path of least resistance for development whereas utilising existing carpark footprints by building up, demolition of dated commercial buildings seeks renewal within the existing CBD square footprint.

Utilisation of availability / like supply

4. Why does the State seek to build another sporting / entertainment stadium? The utilisation and availability of existing basketball, netball, entertainment and Adelaide oval buildings evinces assets already built, underutilised and within nearby city footprints already exists. A further like asset at Helen Mayo Park I'd argue is either a white elephant or makes the other like buildings white elephants.

Capital expenditure

4a. The capital expenditure during the proposed period would occur during a period of elevated market rates labour, materials and scarcity of skilled labour. This is akin to putting petrol onto a fire with existing pipeline of Commonwealth, State, Local and private sector civil construction money in the market. Would the cost per square meter rate be justified, of good value to the taxpayer?

Equity of access

4b. Further by way of equity of access all present facilities and the newly proposed will and do not allow mere members of the public to engage in sport, perform music, present art nor entertainment. The existing assets are an enclave for 'professional' persons only. Presently members of the public can play recreational sport, play music and make artistic display within the parklands area.

4b(1) By way of equity of access all present fee for service sporting and artistic performances are for those of financial means. The proposed structure would be of like fee for service and continue to disenfranchise those who already cannot afford to pay to attend sporting or entertainment performances. As such the assets will by financial demographic become an enclave for those of disposable financial means. Presently the parklands precinct affords recreation, leisure and engagement without financial judgment against a person.

5. Like city example reasons against

5a. Stadium placement Perth

I have recently moved this year from Perth Western Australia where Perth Stadium was built. The footprint of Perth Stadium came at the cost of half a golf course and the environmental amenity provided, could have been built at the rear of Crown Casino complex on existing carpark. It was not and sits completely separate from an existing entertainment and accommodation precinct.

The proposed development would be similar a new build form separate to existing built form and likely incongruous in design.

5b. Noise abatement Perth

Developments in Perth such as the Swan Brewery, East Perth evince incongruity of residential development within entertainment precincts. New property owners became vocal opponents against commercial businesses providing hospitality, dining and liquor provision. As such the commercial businesses have to close early, struggle financially and the areas are ghost towns of later evening. My father previously had commercial ground floor space in East Perth which was envisioned as a new lively entertainment mixed precinct. The proposed installation of a mere ATM machine on one commercial premise was met with vehement opposition by apartment owners above.

Arguably the mixed proposed residential and commercial developments proposed will suffer the same in the proposed Adelaide area whereby residents oppose hospitality created noise.

5c. Utilisation Perth Stadium

Per previous the Perth Stadium is utilised where possible but is arguably under utilised as events have to pay their way for the facility to be open. Arguably a stadium proposed would be of the same in Adelaide seeking for profit private money of taxpayer subsidised events for stadium to be open.

5d. Design form / construction standards Perth

Perth has recently constructed the Elizabeth Quay development which sits separate from existing CBD footprint and has been beset by well known poor construction standards. The proposed Adelaide riverside development will ad jut the existing CBD footprint and form and as such could be viewed at a tack on like Elizabeth Quay.

Construction standards nationally are well known to be of poor standard and not affording the new owners protection against. What prevents the new public / private buildings on new Adelaide precinct from being next Mascot Towers of Sydney?

By design the city of Adelaide like Perth has approved box with balcony tilt panel apartments on masse recently cited in The Age newspaper to be, "crap buildings". To walk the riverside precinct adjacent to Eagle Street Brisbane note a hodge podge of box with balcony buildings without respectful uniformity and show / age poorly. There is little protection against box with balcony constructions, wind creating hodge podge and aged towers.

Within the existing City of Adelaide CBD the area surrounding the central fire station I call the heritage crime zone. Destruction of historic buildings for tasteless built form that has not aged well, there is no prevention against in what is proposed.

Environmental impact

The present Parklands maintenance afford limited environmental impact to afford present form. The proposed land clearance and construction imposes gross in perpetuity environmental impact of scarce non renewable assets without any known environmental offset proposed?

Tall buildings create wind problems, birds are killed by flying into mirrored glass of buildings, loss of perspective of Adelaide hills and riverside is created and non renewable materials are used in construction, construction noise and visual amenity will be lost during

what could be a construction site of a generation if proposed 70 hectares are clearance are proposed.

Political environment

The proposed development is proposed by present Liberal state government with opposition by Labour and Green parties with an Upper House motion planned. An election is coming up with a sense of urgency in present political environment to push this through. What prevents this being a repetition of the Andrews Government in Victoria cancelling major road project of the previous Government at significant financial cost to taxpayer? This feels like desperation of previous Barnett Liberal Government in WA where I recently moved from. Elizabeth Quay and Perth Stadium appeared a 'panic do something statement' from a government that spent and indebted with little to show for it.

Conclusion

For reasons cited previously I am fervently against the proposal and seek protection of present landforms.

Aaron Gray LL.B, CPQM."

Aaron Parker

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Aaron

Family name: Parker

Organisation: NA

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am opposed to the Riverbank Precinct Code Amendment. The Adelaide Parklands should remain as open spaces that are available for the public and not for multi-storey car parking and commercial development.

Attachment: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Submission two:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Aaron

Family name: Parker

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do not support the riverbank code amendment. This will commercialise public space and restrict access to the public. There are other commercial opportunities in front of the Convention Centre that should be developed instead.

Attachment: No file uploaded

sent to proponent email: plansasubmissions@sa.gov.au

Abby

[REDACTED]

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kind regards,
Abby

[REDACTED]

www.adelaidenaturalhealth.com

[Nourish Your Nerves Online Yoga and Meditation Program](#)

Adam Murch

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Adam

Family name: Murch

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Leave our history alone! Enough has been destroyed as it is. It's great to be able to take our kids/grandkids to these places and show them where SA started. But if you keep allowing developers to destroy history we are going to have nothing left. LEAVE IT ALONE!!!!

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Attachment 5: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Adrian Jackson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Adrian

Family name: Jackson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I oppose the rezoning or the changes to the 'sub zoning' of the parklands. This is a unique asset for Adelaide and South Australia. Building more infrastructure on this land, despite how well its 'dressed up with words' is essentially a 'land grab. Once its gone its gone. What the 'developers see as 'underutilised land' is in actual fact a small, but integral, part of the overall parkland presence for this city and State. Not all citizens want yet more coffee shops and eateries. The significance of open space for the future will continue to be even more critical as the Adelaide population grows. Don't destroy this unique asset for short term gain.

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Attachment 5: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Ajinder Singh

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ajinder

Family name: Singh

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am not in favour of the change to extend the Riverbank precinct further. The plans are unimaginative and do not demonstrate how this fits into the future plan for the city. It is not a plan to copy Melbourne or Brisbane with their river precincts as their city design and rivers are completely different environments. Adelaide needs to value the parklands assets and have a plan to invest in them and make them accessible and beautiful drawing in visitors to a natural environment. The parklands have long been neglected and parts have not been looked at for years. The parklands need to be looked at as a whole and seen as a natural asset like Sydney Harbour is or Central Park NYC is. Over the years roads and buildings and leasing to schools has shown little planning to look at this asset as a whole. It also doesn't fit well into the environment. The River Torrens is a small river which has problems with flow. It is already oversized with the current Riverbank buildings. The current Riverbank precinct despite decades of development has not proved a popular area outside of event times. The whole precinct needs to demonstrate it works as a vibrant public space which people can enjoy. Lastly, there are plenty parts of the actual cbd that need investment and the top end of Hindley Street and West Terrace is one area which the government should look to revitalise as part of developing a Medical precinct. Leave the parklands alone and come up with a proper plan and investment for the parklands so they can become iconic part of Adelaide.

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sent to
proponent email: plansasubmissions@sa.gov.au

Alan Tucker



Vicki Chapman had nothing to say about the bill designed to strip ICAC's powers but now wants to strip the citizens of SA of their parklands. You re-zone the parklands and allow developers to build up-to-twenty storey high buildings – and they will. I say no to Vicki Chapman and her proposed changes to the parklands code. Alan Tucker

Sent from [Mail](#) for Windows

Alastair Hunter

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: ALASTAIR

Family name: HUNTER

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Again we have developments proposed to further alienate our precious open space and Parklands. With extraordinary haste, this proposal is insulting to the foresightedness of the planners and founders of Adelaide. It also indicates the limited vision that the proposers of these plans have for this state - entertainment, night life, cafe culture - nothing of real substance or uniqueness. No doubt, as in other cases, the "consultation" will be a sham for public opinion will be ignored.
Yours sincerely Alastair C S Hunter OAM

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sent to
proponent email: plansasubmissions@sa.gov.au

Alex Watson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Alex

Family name: Watson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

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Attachment 4: No file uploaded

Attachment 5: No file uploaded

sent to proponent email: plansasubmissions@sa.gov.au

26 October 2021

DIT

Parkland Code Amendment

per email: plansasubmissions@sa.gov.au

PLANNING SUBMISSION – Sandy Wilkinson

WILKINSON

ALEXANDER

design +
planning by design

Violet Bank
Cnr Old + New Street
North Adelaide, SA 5006

Telephone 0407493192
sandy@alexanderwilkinson.com.au
www.alexanderwilkinson.com.au

The Code amendment is too broad to be considered properly through the Public Consultation process.

Therefore this submission is not as comprehensive as the matter deserves.

Some Key Points

The Adelaide Parklands should be treated as an asset to be preserved not squandered. There should be no net loss of Parklands.

It is staggering that whilst the Adelaide Convention Centre and Hyatt are built over the railway lines, the Code Amendment seems to treat the Railway lines as sacrosanct, rather than treat the Parklands as sacrosanct.

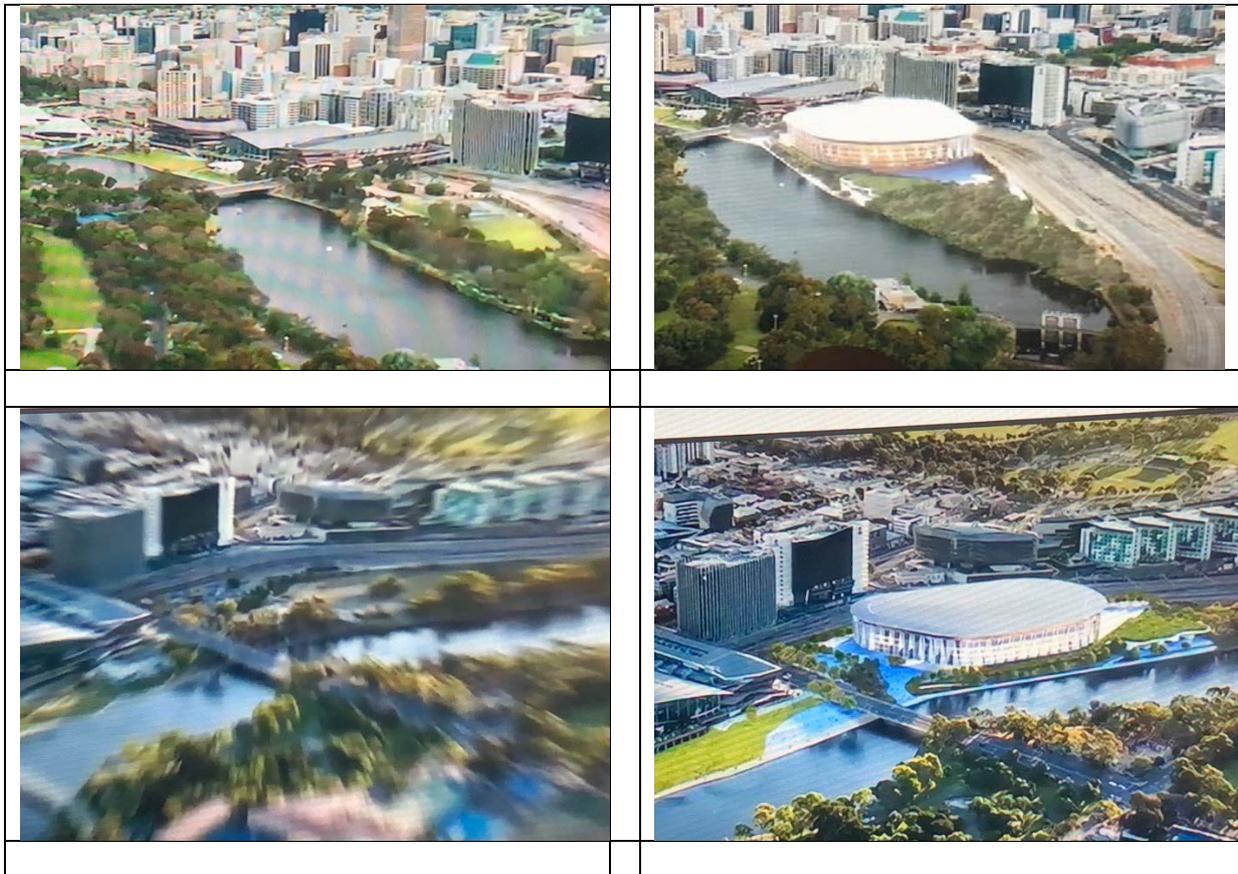
The images attached below, taken from the State Government Promotional video, illustrate how the new Entertainment Centre is built entirely ostensibly on the Park Land north of the railway lines, subsuming the Parklands and boatsheds rather than being built OVER the railway lines.

Whilst it is acknowledged that some of this land is degraded, being used as a car park and storage area, the aspiration is to restore such areas to landscaped Park Lands, not treat such land as fair game for opportunistic government development on free land.

If such an entertainment facility is to be built it should be built OVER the railway lines and perhaps the existing car park north of the railway-lines.

Likewise the WCH is proposed to be built everywhere except OVER the railway lines.

Maintaining optimum river views for the University buildings that were built on the re-zoned Parklands that was where the Skate Park was, or river views from the new RAH is not justification to leave the railway lines undeveloped and instead build on the Parklands as proposed.



I am aware of the Government's intention to sell of the existing WCH site as a 12-storey apartment development site, as I was on the Adelaide City Council when John Rau pushed for this rezoning.

If the Entertainment facility and new WCH were built OVER the railway lines, this visual scar eyesore would be concealed and it would really connect the city to the River Torrens, whilst preserving the Parklands that abut the river.

With such an approach I can see there could be some opportunity to perhaps build some café's into the existing embankment of the railway lines at the interface with the Park Lands adjacent the path leading to the Weir, utilising the significant 4-5m change in topography.

The Train Signal building is a historic structure that could potentially be converted into a viewing platform &/or café. Lounders Boatshed is a great example that I initiated the restoration of in lieu of demolition, that capitalises on the historic structures along the river.



Pinky Flat is of significance to the Kaurua people and all of the area north of the Torrens should preserved and only ever be used for temporary activations.

The concept of the Adelaide Botanic High School Site was sold to the Council on the basis that it would not occupy any more Parkland than the existing building on the site. I see no reason to zone this area to enable any further development of buildings on this area.

It was a rare and great accomplishment that the former at-grade Hospital car park south of the high school was returned to Parklands achieving a wide landscape strip between the Barr-Smith Library of the University with a new western entrance to the Botanic Gardens. The proposed zoning suggests that only a pedestrian access would necessarily be retained, enabling the school to build over parts of this Park land.



Yours Faithfully

ALEXANDER WILKINSON

B.A(Planning)B.Arch.hons(Conservation)

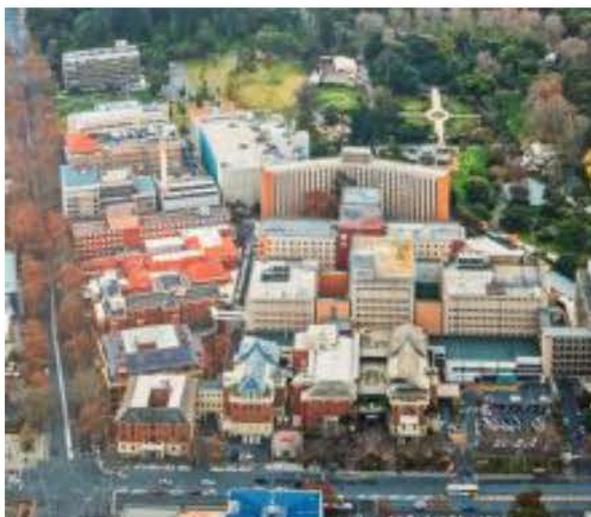
Director

ALEXANDER WILKINSON DESIGN PTY LTD

PARKLAND CODE AMENDMENT SUBMISSION -- SANDY WILKINSON



Not much seems to have been learnt as can be seen from these 1963 & 1966 images



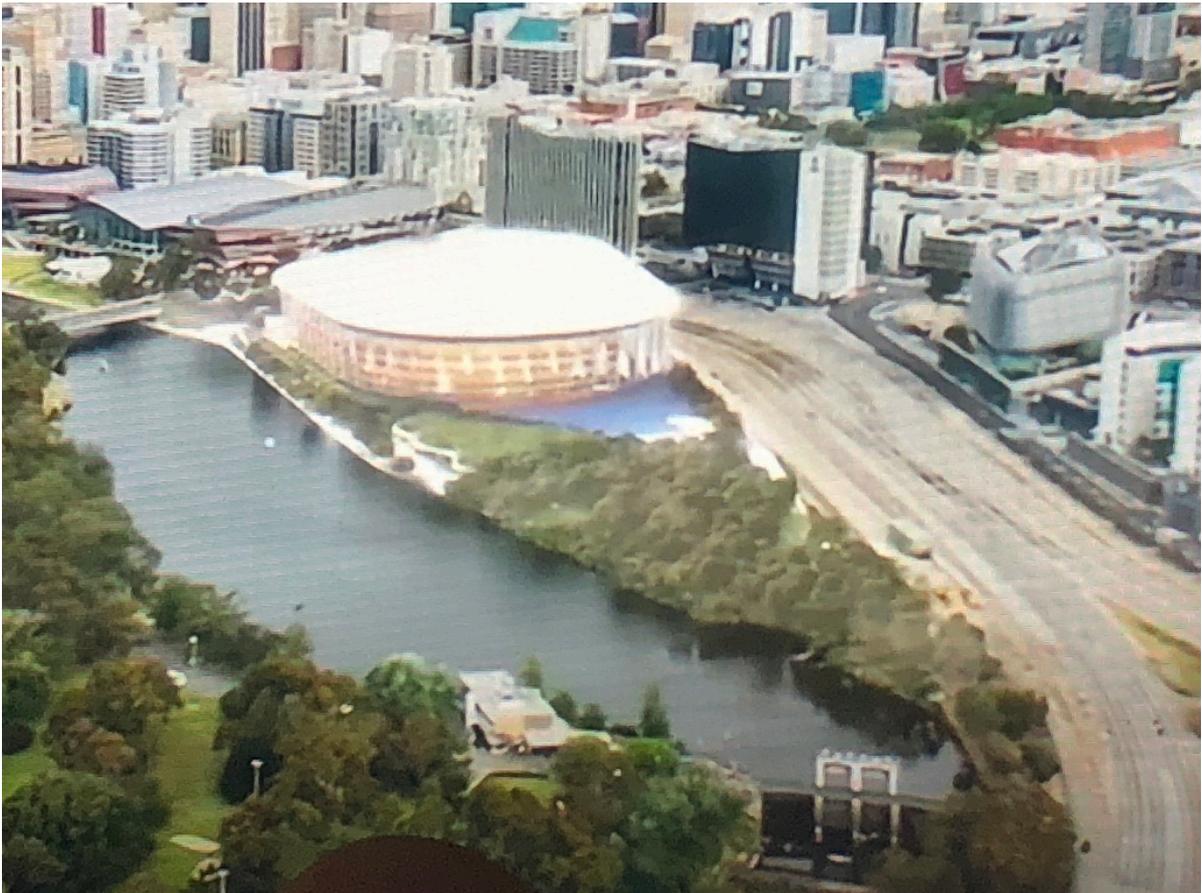
When the Old RAH was proposed to be relocated west to its current location land that was taken from the Botanic Gardens for the East Wing was to be returned to Park Land or Botanic Gardens. This opportunity arose as can be seen in the photos above, but this has not transpired with the land instead being earmarked for more buildings.



Magnificent Archival Railway Station



Now Concealed from view





Alexandra Mannarino



"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Alexandra Mannarino"

Alexis Bennett



“Good morning,

I am writing to express my deep concern regarding the proposed riverbank precinct amendment.

Adelaide is a wonderful state and is known for having a well planned CBD with beautiful surrounding parklands. These parklands not only allow nature to thrive within the city they create surrounding protection and give the city character that is unique to SA... why do you want to destroy this well-working system?!

South Australia is different from the eastern states, why is there a constant push from money hungry professionals to simply create more real estate no matter what the cost?! If money is what you're after utilise what already exists.. don't destroy it.

The events that are held in 'the garden of unearthly delights' in the fringe festival is a great example of how businesses and community groups have drawn on what we already have.. not destroyed it!! They didn't cut down all the trees and flood the park with concrete just so they could get more people in and get more money.. no, they took advantage of what Adelaide already has. Sure, this is an extreme example but if state government allows the parklands to be taken over and rezoning to occur future generations will not get to enjoy what has taken years to establish!

It's so sad to see that bit by bit, building by building Adelaide is losing its character! Do we want to look back years down the track when it's too late and regret what we've done? Compared with other nations, Australia has a very short history. England has gardens and buildings that are hundreds of years old and there is an appreciation of heritage and preservation!

Think of some of the suburbs in Adelaide that people love.. Toorak Gardens, Unley Park, North Adelaide, Malvern.. to name a few, and what are some of the characteristics they have in common? Well-established gardens and trees, heritage homes & businesses, local parks that are full of character. Can state government and local council not see that modernising our city and parklands by paving the bananas out of it takes away this character??!!

My fear is that submission falls on deaf ears and the pursuit of money will reign supreme but if there is any hope.. think of the next generation, think of what prior generations have put their efforts in to build and appreciate before you massacre what already exists!!

Kind regards,

Alexis Bennett”

Ali Fiske

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ali

Family name: Fiske

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The Adelaide Parklands should NOT be rezoned. Adelaide's parklands are unique to our city and must be preserved for all South Australians to enjoy for future generations. There should not be hospitals, medical centres, hotels, cafes, car parks or apartments in our parklands. This proposal is outrageous.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Alison Joseph

[REDACTED]

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours sincerely,

Alison Joseph

[REDACTED] "

Alison Smedley

[REDACTED]

"To Whom It May Concern,

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Sincerely,

Alison Smedley"

Alison Wood

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Alison

Family name: Wood

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: With climate change we need all the green open space we have left. We need open ground for the rain to penetrate and trees to shade and capture carbon emissions and produce oxygen.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Allyson Carpenter



"I reject the re-zoning of any part of the Adelaide Park Lands.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource."

Amy Hulsinga

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Amy

Family name: Hulsinga

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please leave the trees and greenery as they are. The natural space is a wonderful legacy and a huge part of our beautiful city's identity.

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sent to proponent email: plansasubmissions@sa.gov.au

Amy Martin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: amy

Family name: martin

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: No rezoning of any park lands!! Adelaide is unique, it has the only park with a city inside it. Any green public land needs to be restored and reclaimed, remediated and re greened as required. The park lands need to be preserved for all south Australians. There should be no development on parklands - no hospital, no stadium, no hotels, no cafes and no residences.

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sent to proponent email: plansasubmissions@sa.gov.au

Anabella Gigli



"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Annabella Gigli"

Andrew Cannon

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Andrew

Family name: Cannon

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The whole approach is totally misguided. The natural parklands are the thing that sets Adelaide apart. Built form, concrete and bitumen destroy this natural asset. They should be placed on areas of freehold title that have already been alienated from open space. The new stadium, the new hospital, the new school, parking and all forms of accommodation, administration. sporting and restaurant facilities should be place somewhere other than the parklands.

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sent to proponent email: plansasubmissions@sa.gov.au

Andrew Dyson (Kensington Residents' Association)

Attached is our Association's submission regarding the proposed Code Amendment.

Regards

Andrew

Andrew Dyson

Secretary

Kensington Residents' Association Inc.

42 Regent Street, Kensington, 5068

Phone: 8331 9654

contact@kra.org.au

Alternative email: gps.ap@senet.com.au

www.kra.org.au

"KRA - Serving the community since 1977"

Code Amendment Team,
Planning and Land Use Services Division,
Attorney-General's Department,
Adelaide,
SA, 5001

The Secretary,
Kensington Residents' Association Inc.,
Mr A Dyson,
42, Regent Street,
Kensington, 5068.
27th October 2021.

Re: Riverbank Precinct Code Amendment

Dear Sir/Madam,

The Kensington Residents' Association was founded in 1977 and is regarded as one of the most active residents' groups in Adelaide. Our Association represents the interests of the residents of historic Kensington village, the small suburb with the unusual diagonal street pattern.

Our Association believes that the Adelaide Parklands belong to all South Australian residents, not just those that reside within the City of Adelaide or adjacent to the Parklands. We consider it appropriate for our Association to express an opinion on the future of the Parklands.

Throughout our history, the Association has had a strong focus on our environment resulting in significant environmental gains earning recognition of our environmental credentials. We have: secured extensive and significant street tree planting resulting in shady streets; successfully lobbied for the establishment and subsequent extension of Borthwick Park (Kensington's major park); and, since 2010, re-vegetated large areas of Borthwick Park with locally indigenous species to improve and increase biodiversity.

Adelaide was granted a unique and wonderful legacy by our first Surveyor General Colonel William Light in establishing the ring of Park Lands around the city and North Adelaide. No other major city in the world has such a legacy.

Over the years various governments of both political persuasions have stolen portions of the Park Lands for many different reasons. In fact approximately 25% of Light's original Park Lands have been lost or alienated from general public use. Generally, it has been a matter of the gradual loss of little portions of Park Lands to a variety of special interests. They may not appear to be much at the time but they add up. The Park Lands belong to the people of South Australia they do not belong to the government of the day.

Accordingly, our Association is strongly opposed to any plans to alienate any of the Adelaide Park Lands through the proposed rezoning of very significant portions of the Park Lands. The Park Lands should offer free and unrestricted access for all South Australian citizens and our visitors. Portions should not be permanently fenced, restricting public access, and there should not be any privatisation or commercialism of the Adelaide Park Lands.

In conclusion we urge you to abandon the proposed rezoning of any of the Adelaide Park Lands in the Riverbank precinct.

Yours faithfully,



Andrew Dyson
Secretary (8331 9654)

cc Community Alliance SA
Hon Steven Marshall, Premier
Hon Vickie Chapman, Deputy Premier & Minister for Planning
Mr Peter Malinauskas, Leader of the Opposition
Ms Andrea Michaels, Shadow Minister for Planning
Hon Connie Bonaros, MLC
Hon Robert Simms, MLC
National Trust of SA
Protect Our Heritage Alliance
Adelaide Park Lands Association

Andrew Hill

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Andrew

Family name: Hill

Organisation: City of Adelaide property owner (residential)

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am totally opposed to any conversion of land within the City of Adelaide currently assigned as parklands for any other permanent purpose. Whilst not opposed to events and activities upon these lands which may draw in more people and be temporary in nature (fairs, concerts, gatherings etc) I do not wish to see the riverbank converted and built upon, and not given over to ongoing commercial activities. The parklands are a hallmark of our city and in a time of climate change we need to be investing in more green space not building over it. The recent retreat from the cities by huge numbers of our populations is an indication that we must maintain and intensify our green spaces to attract people to the city, not cause them to seek sanctuary in rural areas. Adelaide must maintain its distinctive character around the riverbank and its integrated parklands.

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sent to proponent email: plansasubmissions@sa.gov.au

Andrew Macintyre

[REDACTED]

To the relevant authorities,

I am very much against further reductions of park lands. There has been a 'salami slicing' - taking parkland for commercial and other purposes that's been going on for many years.

If land was added to the park land, it would not be so bad- eg, when the old RAH was demolished, that land could and should have been returned to parkland. This would partly compensate for past park reductions... eg, widening the roads, putting in the OBahn roadworks, etc.

Even adding to the Botanic High School precinct would have been better than most of the planned buildings and infrastructure going up now.

And how about turning the old RAH nurses' quarters into accommodation for the homeless?

But the government's short term greed for cash prevails again.

We seem to be inevitably moving on with a crowded, boring city encroachment of our lovely riverside-and benefiting the wealthy few- rather than making the most of a unique asset, envied by many other cities.

I also want to see protection for the local and dwindling flora and fauna: I'm sure many others will make that part of their submission.

So, please stop encroaching on *our* parklands.

Respectfully yours, Andrew Macintyre,

[REDACTED],

Phone number [REDACTED]

Andrew McKay

[REDACTED]

To Whom it May Concern,

Below is my feedback for the proposed changes to the Adelaide Parklands Rezoning. As a regular visitor to the parklands I am deeply concerned about some of the proposed changes to the current zoning codes.

Firstly I believe that there is no need for a new arena in the Adelaide precinct. I believe it is a waste of money especially when worthwhile areas such as health, aged care and law and order are in greater need of more funding. We already have a wonderful oval nearby which could be further utilised.

Secondly, I am also against the development of permanent cafes and shops on the Pinky Flat river bank. Surely greater use of mobile traders like food and coffee vans would provide employment for a wider range of people. Perhaps a weekend market could provide a form of activation that would have a reduced effect on the area's environment.

The Memorial Drive Complex, which is situated nearby, could also be encouraged to offer more public accessibility for its cafe and restaurant so that visitors of Pinky Flat and surrounds could have food and beverages. One suggestion could be having an entrance on its south western corner for riverbank visitors to have a convenient entry.

The parklands need to be protected from unnecessary permanent developments when viable alternatives are readily available. The need for urban green space has never been greater and it will become more important with climate change and health and wellbeing issues increasing in coming decades.

Yours sincerely,

Andrew McKay

[REDACTED]

Fitzroy 5082.

Andrew Phillips

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Andrew

Family name: Phillips

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please do not develop this parcel of land. Enough is enough with the ugly skyscrapers. Do not give in to greedy developers.

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sent to proponent
email: plansasubmissions@sa.gov.au

Andrew Robertson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Andrew

Family name: Robertson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am opposed to the proposed rezoning of the Park Lands. I could have accepted some rezoning, if limited to ONLY the proposed Stadium and new WCH (but NOT the separate carpark), however I cannot support the proposed rezoning as presented. The Park Lands are on the National Heritage List, and work is currently being done to seek both World Heritage listing and National City Park status - this rezoning would jeopardise all of that. Adelaide is often referred to as a "city in a park" and it is time we recognised that the Park Lands are a valuable economic and marketing asset, they are not just green space. The proposed or possible developments on the Park Lands are clearly contrary to the Adelaide Park Lands Act 2005, so these developments should not even be contemplated - that's also true of the Stadium and WCH, however as stated above, I could accept those developments if the rezoning was limited to them only. There is another pro-business argument that should be considered. The hospitality sector has been among the hardest hit by COVID-19, and still faces capacity restrictions - the last thing it needs is a new State-sponsored precinct to compete against. When public funds are spent on projects, they should repay a dividend to the taxpayers who funded them - as Adelaide Oval did, by increasing trade in the City and North Adelaide. The new Stadium and other components of the Riverbank should also support our existing businesses, not a whole new precinct. If the City and North Adelaide were fully tenanted perhaps there'd be a case for new development (although, frankly, not on the parklands) but as that is not the case, new infrastructure like the Stadium should be designed to support our existing businesses and make the existing businesses more vibrant. All in all, this proposed rezoning is a massive over-reach and impossible to support.

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sent to
proponent email: plansasubmissions@sa.gov.au

Andrew Stock

Please find our submission a

Please provide confirmation of receipt by return email.

A M Stock



27 October 2021

Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

Dear Sir/Madam,

Re: Proposed Riverbank Precinct Code Amendment

Please find attached our submission on the proposed rezoning of the Riverbank Precinct.

We expect that the government will reject in full this seriously flawed proposal which does not have our support. It undermines the heritage nature of the National Heritage Listed Adelaide Parklands and is contrary to a liveable modern city in a park - something Adelaide promotes nationally and overseas.

We would be willing for the attached submission to be made public if required **but not** this cover letter with our address.

Yours sincerely

Andrew and Gay Stock

**Submission AGAINST the proposed Rezoning of the Riverbank Precinct
as per the Code Amendment**

We **strongly oppose** the proposed Rezoning of the Adelaide Riverbank Precinct in its entirety.

This proposed action by the state Liberal Government undermines the integrity of the National Heritage Listed Adelaide Parklands. It is the biggest "land grab" of free parklands in the state's history, earmarking 70 hectares for development with roads, massive concrete buildings, car parks for over a thousand cars, for-profit commercial properties including buildings 15 to 20 stories high.

Adelaide's National Heritage Listed Parklands are the very essence of what makes Adelaide a liveable city. Converting open grassed and treed spaces into built concrete and glass environments will sterilise Parklands for eternity. As we have seen elsewhere (eg the old RAH site), once built form takes Parkland space, it never returns to park again.

This rezoning proposal will see a major park - Helen Mayo Park, with its old trees and open grassed spaces, bulldozed and replaced with a massive concrete and glass monolithic structure and parks for 500 cars. Instead of re-zoning to deliver yet more parkland alienation, the State Government should be rehabilitating the areas surrounding Helen Mayo Park which have been converted by short term thinkers into a dump for river spoil, and construction lay-down areas for North Terrace and Convention Centre building projects (also on what used to be originally Parklands). It is quite practicable to regenerate and re-green such spaces rather than use the presence of things like lay-down spaces and car parks as a feeble pretence to develop that free land for a massive building.

A similar argument applies to the proposal to build the new Women's and Children's Hospital (WCH) adjacent to the RAH by alienating yet more Parklands. By adopting a WCH built form that is low profile and widely spread out, it is guaranteeing that much more land area will be required, and that this hospital will be a repeat of the costly RAH debacle. There are many sites within the Adelaide city itself that are vacant and would allow a multi storey hospital to be built at much lesser cost per bed than the new WCH proposal. The new Calvary hospital has shown what can be achieved in terms of cost - a modern facility at a fraction of the cost of the RAH! The old Newmarket Hotel site marked for redevelopment into large multi-storey building(s) is close to the RAH and would be one such opportunity.

As for the argument that a new "stadium" is required to replace the Entertainment Centre, there has been no business case presented to justify why that could not be achieved through re-developing the existing Hindmarsh sites of either the soccer stadium or the entertainment centre. To permanently usurp and sterilise Parklands for such commercial gain cannot be justified without full and comprehensive disclosure to the public of what would have to be a compelling case. Any arguments presented have been feeble at best.

Indeed, what becomes obvious on reading through the materials and related documents for the WCH and Stadium is that selecting Parklands for both of these sites is driven by a strategy to secure free Parkland space and sell the existing WCH and Entertainment Centre sites to developers for profit. Venues SA website says explicitly that the Hindmarsh site will be "decommissioned" once the stadium is built - ie sold to developers. The old WCH will likely be redeveloped into multi-million \$ apartments.

This theme of profit driven thinking is also reflected in the use of the term "activate" - a word that gets thrown around with abandon by "Team Adelaide", who seem to think that treed and grassed open spaces for quiet family relaxation and reflection are a wasted development opportunity. They would rather see commercial enterprises, like bars, restaurants and clubs take over areas like Pinky Flat. To these people, its all about money for their developer mates.

Adelaide's forefathers built a city centred on free enterprise, but not of the ilk adopted by the current Liberal Government. Our forefathers recognised the importance of open public space for city residents to refresh, recreate and enjoy. That did not mean building permanent massive structures on the Parklands, but rather open treed parks, walking and cycling paths, and the like. This proposed Rezoning of the Riverbank Precinct should be REJECTED OUTRIGHT.

Andrew Taylor



I reject the Government's so-called "vision" for the Adelaide Park Lands.

Open Green Public Spaces do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage.

Your vision for the parklands and intention to rezone is merely pointing out to the public the entire lack of sense of our politicians and their advisors.

I was educated at boarding school in Adelaide and graduated from the University of Adelaide and am dismayed at the damage that has been done In the last 70 years in the parklands and along the river bank.

Andrew Telfer

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Andrew

Family name: Telfer

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please refer to attached submission

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proponent plansasubmissions@sa.gov.au
email:

Submission re Riverbank Precinct Code Amendment

With the possible exception of the nWCH (because the nRAH has already been built on Parklands and there is some health benefit in co-location) I strongly object to the proposed Code amendments. I do not believe that the changes accord with the Statutory principles in Section 4(1) of the Adelaide Park Lands Act 2005 and, in particular, clauses a, b, e and g.

There has already been extensive loss of green parklands over many years and, recently, with the expansion of the Convention Centre, building of nRAH and the university health buildings etc which

have closed in this stretch of former parklands along the Torrens. To allow the building of even more significant buildings, including (and especially) a stadium, would be further misuse of our parklands. I did note that there would be a limit of 2 storeys on buildings along the river but I'm afraid that there have been too many instances in our beautiful city where planning rules have been changed to allow higher buildings than originally allowed for - so I am not happy with this stated limitation.

The parklands around Adelaide are apparently a unique city feature in the world. It is ironic (or, perhaps, crazy) that while an application is being made for them to be World Heritage listed, the State Government is planning to take away even more of the green open space which is so precious and historical to Adelaide.

The building of an arena on parklands with the possibility (as stated in the Q&A on the SA Government website) of "other entertainment-related and health-related uses to activate the area" is a travesty. How do "health-related" uses fit into an Entertainment Sub-zone? This would use a great deal of open parkland.

There are some areas identified in the Q&A as being currently used for such things as discarded soil, storage yards and police horse agistment. These are inappropriate but, rather than putting more buildings in these areas they should be returned to open parklands. I note that one of the stated benefits of rezoning the Police Barracks/Adelaide Gaol etc area is that it "will unlock future public / private investment in infrastructure associated with the Biomedical Precinct and greater Riverbank Precinct". The involvement of private investment is likely to lead great pressure on the Government to bend the rules.

In relation to the Adelaide Botanic High School area it seems to me that the focus of the proposed change is completely wrong. The Q&A states that the land surrounding the High School is being rezoned "to better reflect the existing use of the site as an innovative school with a technology and research focus". Surely, the emphasis should be on preserving the parkland not on providing greater facilities for a new school. The fact that the current open space link between Frome Road and the Botanic Gardens is to be maintained would seem to negate the need to rezone this land. In addition, I query why more parkland will be used to provide integration between this site and Lot Fourteen, as stated in the Q&A, when there is a perfectly good footpath along Frome Road.

In conclusion, I am strongly opposed to the proposed Code Amendment because of the additional loss of Adelaide's unique and significant parklands. A stand must be taken at some time. This proposal simply continues the incessant loss of this wonderful asset to the city of Adelaide.

Thank you.

Andrew Telfer

Andrew Tidemann

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Andrew

Family name: Tidemann

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I oppose the proposed amendments to the Riverbank Precinct Code. The proposed changes will allow for approval of developments out of keeping with the surrounding area, and reduce the amenity and natural beauty of the precinct. I oppose the planned removal of the riverbank rowing clubs, and similarly, the proposed sports stadium. I will look to vote for the opposition at the next election if the government proceeds.

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proponent email: plansasubmissions@sa.gov.au

Andrew Wilkinson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer
type: Other

Given name: Andrew

Family name: Wilkinson

Organisation:

Email address [REDACTED]

Phone
number: [REDACTED]

Comments: The Riverbank zone must be maintained as community space. Having lived in Melbourne and seen the destruction of the Yarra River Southbank precinct, and similarly to that in Brisbane, these developments really introduce filth to the area, both literally and figuratively. A better way to make the area a part of the health and wellbeing of the city would be to encourage pop-up cafes and food outlets with some live music and family activity. Major cities around the world who embrace better community spaces see local economic gains increase significantly.

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proponent plansasubmissions@sa.gov.au
email:

Angela Menadue



"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Angela Menadue.

Angus Brosnan

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Angus

Family name: Brosnan

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: My comments concern the area of Adelaide Botanic High and the adjacent park between the Ginkgo Gate and Frome Rd. I strongly oppose the rezoning of this space. It is my view that both the Uni building that was previously on the site and more so Adelaide Botanic are inappropriate uses of this land. This should be maintained as/returned to parkland. I also understand that closing a brand new school is both a waste and unrealistic however the actions of the council and state government should be to avoid the school encroaching any more onto parkland (as Adelaide Highschool has done). By rezoning the area in front of the Ginkgo Gate this sets precedent for the school to expand onto this land which would be very regrettable. As for the land that the school sits on, I'm less worried about that, however in principle I still believe this should not be rezoned. Given that the school was allowed to be built on land zoned as parkland I can't see why persisting in that state should be a problem. At such time as the school is closed, the parkland zoning that remains would indicate the purpose to which it should be returned. Overall I just worry that the more steps are taken to shift that land away from being parkland the harder it will be to return it when an opportunity arises. I know that you intend to 'retain the important open space link from Frome Road to the Adelaide Botanic Gardens' but I don't trust the government not to use that to try to use some of that space for the school. I'm also opposed to cafés and such being built along the river. That is also public park land and should not be used for private business. I am also somewhat concerned about litter coming from eateries along the river. Food carts and similar temporary or low-impact structures are less of an issue in my view.

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sent to
proponent email: plansasubmissions@sa.gov.au

Angus Wallace

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Angus

Family name: Wallace

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This is a terrible idea. The parklands provide an important green belt around the city and this death-by-1000-cuts needs to stop. It is also the only separated East-West non-vehicular means of accessing the CBD.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Ann Doolette

PlanSA,

Submission Details

Amendment
: Riverbank Precinct Code Amendment

Customer
type: Member of the public

Given name: Ann

Family
name: Doolette

Organisation
:

Email
address: [REDACTED]

Phone
number: [REDACTED]

Comments: I oppose this rezoning in the strongest terms. My reasons are in the attached document.

Attachment: Riverbank_Precinct_Code_Amendment_Consultation_Response_Doolette_Oct_2021.pdf, type application/pdf, 114.2 KB

sent to
proponent plansasubmissions@sa.gov.au
email:

Response to Riverbank Precinct Code Amendment Consultation

I oppose, unconditionally, all aspects of this proposal to rezone the Adelaide Parklands. It is a rapacious land grab with no justification. It is inconsistent with statutory principles set out in the *Adelaide Park Lands Act 2005*.

I remind the Planning Commission and Members of Parliament that the Parklands belong to the people of South Australia. It is not land available to the government of the time to consider this as vacant land available for its own projects or commercial uses.

The Adelaide Parklands are integral to the fabric of South Australia. They are the jewel in Adelaide's crown.

I remind the Government that Colonel Light's 1837 survey included 2,300 acres [930 hectares] of park surrounding the city. This original survey of Adelaide was of a city surrounded on all sides by parks **reserved from sale and dedicated as parklands for the use and recreation of the citizens**. The survey allocated 9 blocks within this 930 hectares for government buildings and facilities that included a government house, a botanic gardens, a hospital and a cemetery. By

1849, these original 9 blocks were expanded to 380 acres [154 hectares] being set aside for Government purposes – a generous allocation.

In 2021, 760 hectares of Parklands—about 80%—are under the custodianship of the City of Adelaide Council and this is open space for all. The South Australia Government is the custodian of the remaining 20% which comprises government buildings and facilities.

I note that the Planning and Design Code, introduced in 2021, designates the 80% as the Adelaide Park Lands Zone and the remaining 20% of the Parklands is divided into different Zones and Subzones with variously named Precincts used by the Government.

This current government bid to take further Parklands is for about 70 hectares or 10% of the total Parklands.

The various South Australian Government strategic plans, summarised in the consultation paper, set out goals to enhance our vibrant city through extending the existing entertainment, education, innovation and health facilities in central Adelaide. And, of course, we want a vibrant city. But the current proposal comes at the cost of our shared open space in the city and the indisputable health, environmental and economic benefits that green, treed, open space within a high-rise city provides the community.

The Adelaide Parklands are part of South Australia's heritage and contribute to Adelaide's character as a planned city ringed by open space that allows the city to breathe. On the one hand, this Government wishes to exploit this through: (1) its current application to become the world's second National Park City, and (2) by being able to boast of Adelaide's richly deserved status as the world's third most liveable city. Both of these are contingent on maintaining our Parklands. On the other hand, this Government is actively destroying our built and natural heritage through insensitive infrastructure development that is contributing to the degradation of our environment. (The examples are numerous, but outside the scope of this response.)

The proposal to rezone the following land from Adelaide Park Lands Zone to City Riverbank Zone and apply the Health Subzone:

- • Port Road, Adelaide (Lot 51 in D56872, CR:6166/588)
- • Port Road, Adelaide (Lot 13 in D85638, CR:6166/588) – portion only
- • North Terrace, Adelaide (Q103 in D111983, CT:6206/719) – portion only
- • War Memorial Drive, North Adelaide (Lot 22 in F14185, CT:5803/625) – portion only
- • Gaol Road, Adelaide (Lot 80 in D56872, CR 5999/489)
- • 18 Gaol Road, Adelaide (Section 549, CR 5756/336)
- • Gaol Road, Adelaide (Part Section 1203, CR 5760/638)
- • Gaol Road, Adelaide (Section 1204, CR 5761/141)

The Government's intention behind this proposal is to extend the so-called medical precinct to take over Parklands on which the old gaol, the police barracks and the historic olive grove now sit.

The Government's wish is to build a car park on the historic olive grove to service the new Women's and Children's Hospital planned for the site adjacent to the Royal Adelaide Hospital (on land already re-zoned from Parklands). Media reports are that the Government considers building a car park on the Parklands is a cheaper option than building an underground car park underneath the planned new hospital. There is no doubt that a car park is needed for the new hospital. But it's not acceptable to build this on the Parklands when a carpark under the hospital is a viable alternative. The longer term cost of losing Parklands is far greater than any short term savings.

The historic but neglected olive grove, with its strong connection to South Australia's early agricultural industry, makes a valuable contribution to this historic precinct and potential tourist destination. While olive trees are not everyone's favourite tree and can't compete with the majesty of our eucalypts, these hard-working trees are very long living and thrive in poor sandy soils where other trees cannot take hold and provide us with the benefits of trees day-in-and-day-out with little attention. The expanded health precinct is heading towards becoming a concrete jungle and these trees, along with the open space, are sorely needed in this section of the Parklands.

The Government's wish to turn the State heritage-listed Old Adelaide Gaol and Police Barracks into facilities for complementary biomedical and ancillary health services will destroy their historic value and tourism potential.

It's a great idea to sensitively develop our historical gaol/police precinct, along with the adjacent olive grove, as a tourist destination (as suggested in the consultation paper). But a re-zoned precinct is not needed for this to occur; the buildings can be redeveloped within their open space Parklands setting.

The proposal to rezone the following land from Adelaide Park Lands Zone to City Riverbank Zone and apply the Entertainment Subzone:

- Montefiore Road, Adelaide (Lot 102 in D33772, CL:6185/34)
- Montefiore Road, Adelaide (Lot 103 in D33772, CR:5220/707)
- Montefiore Road, Adelaide (Lot 104 in D38136, CT:5522/17)
- Montefiore Road, Adelaide (Lot 200 in D73606, CR:6161/289)
- Montefiore Road, Adelaide (Lot 201 in D73606, CR:6102/700)
- Montefiore Road, Adelaide (S1009 in H105100, CR:5765/293)
- North Terrace, Adelaide (Q104 in D111983, CT:6206/719)
- Festival Drive, Adelaide (Q102 in D59055, CT6230/49)

The Government's wish is to expand the City Riverbank Zone to extend the so-called entertainment precinct and claim this section of the Parklands for a sports arena. Another sports arena in Adelaide may well be needed. But it does not need to be built on the riverbank within the open space Parklands. Furthermore, the wish to build associated high rise buildings in this area, with the potential for them to be sold for private or commercial use is not appropriate on the Parklands. It is an environmentally insensitive proposal to build on the riverbank and completely ignores the stands of mature trees river that fill this area allowing the city to breath.

The argument that the land is partially degraded and hence has no value is a shameful admission of the Government that it, and previous governments, have allowed this section of the Parklands to become degraded. Its degradation is certainly not a reason for building on it.

The proposal to rezone the following land from Adelaide Park Lands Zone to City Riverbank Zone and apply the Innovation Subzone:

- Frome Road, Adelaide (Lot 1 in D28393, CT:5988/26)
- Frome Road, Adelaide (Lot 22 in D51367, CT:5696/850) – portion only

The Government's intention behind this proposal is to extend the so-called innovation precinct by claiming a small portion of the Parkland adjacent to the Botanic High School. There is no reason for acquiring this land other than to take control of a piece of Parklands to tidy up the boundary of the precinct.

The proposal to apply the new Riverbank Subzone to the following land in the Adelaide Park Lands Zone:

- War Memorial Drive, North Adelaide (Section 1640 Park 27 CR:6144/507) – portion only
- War Memorial Drive, North Adelaide (Section 1639 CR: 6144/507) – portion of
- Victoria Drive, Adelaide (Pces 20, 21 Pt 22 CT: 5707/711)
- Victoria Drive, Adelaide (Pt Section 1018 CR: 5737/419)
- King William Road, Adelaide (Section 6026 H105100 CR: 6102/717)
- Montefiore Road, Adelaide (Pt Section 769 CR: 5754/512)
- Park Terrace, North Adelaide (Lots 1-6 F41835 Lt 14 CR: 5807/963) – (River Torrens) portion only

The Government's wish is to take over this section of the Parklands and turn it into a riverbank or waterfront precinct, with the intention of sub-letting the riverbank to commercial activities, such as retail and hospitality, and allowing for low rise buildings on the riverbank to house these commercial activities. The Government appears to have grandiose ideas for turning the riverbank into a replica of Melbourne's Southbank. A more honest approach would be to ask South Australians if this is what we want for our riverbank, instead of obfuscation of the proposal hidden in a re-zoning application. I do not want this; I want open, green, treed space accessible by all, like most South Australians. There is no compelling rationale for this type of development. Further enhancement of the natural environment on this section of the riverbank is a great idea, so the Government should fund the Adelaide City Council to enhance the amenity value of this part of the Parklands currently under its custodianship. In doing so, the Adelaide City Council is more likely to improve the riverbank in a manner that recognises the cultural significance of this area to our First Nations people.

This proposed amendment to the zoning of the Parklands is out of step with community expectations.

Australia, like the rest of the world, is facing significant challenges from climate change. The abundant scientific evidence now emerging is that green, treed, open space is one of the most significant mitigations against the impacts of climate change. Adelaide is so fortunate to be ringed by Parklands that cool our city and contribute to the sequestration of carbon. Losing more Parklands will reduce this mitigation. Yet this is totally ignored in this proposed land acquisition.

One of Australia's burning, yet unresolved, social issues is reconciliation with our First Nations. Much of reconciliation is based upon acknowledgement of country. Yet the disrespect to the Kaurna nation of the proposed use of these parts of the Parklands is ignored in this proposal. Shame on the Government.

The built development suggested in the consultation paper can be achieved; it does not have to be on the Parklands. The consultation paper provides no compelling case for any of the developments proposed by the Government. It does, however, highlight that enhancement of the amenities value of the open space Parklands would benefit South Australians. The South Australian Government should be funding the Adelaide City Council, under the guardianship of the Park Lands Authority, to sensitively upgrade the Parklands. In doing so, the unique and highly valued Parklands that are part of Adelaide's heritage will be preserved and the amenity value to the citizens and attraction for tourists will be enhanced.

Ann Doolette 18 October 2021

Ann Lee



"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

ABSOLUTELY OUTRAGEOUS, ANOTHER GRAB BY DEVELOPERS, PARKLANDS ARE A PROTECTED AREA, IT WOULD BE A CRIMINAL ACT TO WRECK A VERY SPECIAL SPACE SET ASIDE BY ORIGINAL COL. LIGHTS PLANNING. ENOUGH BLASTED AREAS PINCHED. NIBBLE NIBBLE AND THEN GONE. HOSPITALS STADIUMS RAILWAYS RACETRACKS ETC STOP IT.

Ann O'Connor



"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource."

Ann Schwartz

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ann

Family name: Schwartz

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: I am opposed to any changes to the existing SA Police Barracks or The Old Adelaide Gaol. These are a part of our history and should be maintained. I do not have confidence that if this was to pass that somewhere down the track if a developer with lots of \$ came along that they would not be sold.

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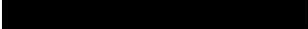
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sent to
proponent plansasubmissions@sa.gov.au
email:

Ann Sherwell



LEAVE OUR PARKLANDS ALONE - THE PARKLANDS ARE FOR THE PEOPLE OF SOUTH AUSTRALIA NOT A RESOURCE TO BE PILLAGED BY GREEDY DEVELOPERS.

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Ann Sherwell



Ann Weedall

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ann

Family name: Weedall

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: No!!!! You shouldn't be changing the zoning to allow building on our parklands. I remember going for picnics when I was a child and feeding the ducks and swans on Pinky Flat, many families do the same thing today. I don't want to see us become another Melbourne concrete canyon, Adelaide was voted the third most liveable city, I think it's fine the way it is.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Anna Greaves



I can't believe the government is planning development in the parklands. Adelaide is a beautiful city especially because it is surrounded by parkland. It is our heritage and we need to care for it, Adelaide is unique Anne Greaves

Anna Leslie



Dear Premier,

I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please reconsider your proposals, and keep the parklands as protected green spaces for public use.
Regards, Anna Leslie

Anne Ballard

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Anne

Family name: Ballard

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: As a city resident who believes the parklands provide important green space for the use of all people in South Australia I am horrified to see this takeover of the parklands for commercial purposes. It is an absolutely appalling idea. Although a Liberal voter for most of my adult life, and for some time a Liberal Party member there is no way I can bring myself to vote for a party prepared to do this. I was please to see in today's paper that the parking area for the new hospital has been re-designed to take up less parklands space, but I cannot support permanent commercial and private structures as proposed in this suggested amendment

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proponent plansasubmissions@sa.gov.au
email:

Anne Gayler

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Anne

Family name: Gayler

Organisation: private citizen

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The proposals for appropriating public land for construction of buildings and an arena are deeply concerning. The Adelaide Oval development removed a significant amount of Park Land space, then a hotel was added. Memorial Drive has gone from a few tennis courts in the parklands, to a massive multi million dollar development for commercial use. That any more publicly owned open land & heritage vegetation should be taken up in a time when we are facing climate change is an affront to the people of SA..now and in future. Our Parklands are world heritage listed. They should be protected and improved for the enjoyment of the people, now and in the future. No politician or public servant has the right to dispose of these assets.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Anne Hunt



Please leave oyr green areas alone. We are lucky to have them. Do something for the planet this one time. A hunt

Anne Kirk

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Anne

Family name: Kirk

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: While I enjoy the different architecture on the southern riverbank side of the Torrens, I value the open spaces & trees along the River Torrens. I've been on a walking tour with a Kurna Elder & I think it is important we do more to acknowledge that the River Torrens area was a meeting place for Aboriginal people for thousands of years. If you have more buildings, we will lose that connection. If we are to become a National Park City & cope with global warming, we need more parks & open spaces. There is an unused boat shed near the Uni bridge that could be used as a cafe/art space/history centre. We are one of the most livable cities in the world, lets not go backwards by trying to imitate other less livable cities.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Anne Knight

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Anne

Family name: Knight

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I strongly oppose the proposed changes to the Parkland zoning which would allow more development in the parklands, particularly in the areas bordering the River Torrens. We need to preserve our open spaces and our beautiful parklands for all people to enjoy, and not to cover them with buildings. The Adelaide Parklands were once called the "lungs" of our city - we need to preserve them as green space for our health and wellbeing. I love to walk along the Torrens Linear Park, but feel it would be ruined by more buildings and commercial activity along the riverbank. It would be shameful to destroy one of the most important things that Adelaide is known for - its beautiful Parklands. Please don't make this change to the zoning.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Anne Monceaux

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Anne

Family name: Monceaux

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do NOT support this development. These proposed plans for development on the parklands are abhorrent. They truly will desecrate the land that has already had too much intrusion by development. This land can never be recovered for the good of all Adelaidians and people who come from further afield to enjoy our parkland city. These parklands are unique. They provide respite from a busy city life. They are good for mental health, for wildlife habitat, for relaxing, exercising, picnicking, contemplating and for artistic opportunities. I oppose such development as it is the complete antithesis of reason that these parklands were placed here in Light's original plan. They are a buffer zone. They are part of our colonial history and the trees like the Moreton Bay figs, the olive groves and the Adelaide Gaol and horse yards are valuable. You need to make parking for the WCH underground to avoid further sprawl or relocate the hospital away from its present location and return the land to parklands. These areas MUST NOT be sacrificed to the developers. Keep our parkland rim around the river safe from multi-storey concrete and glass structures that will only serve a very small and wealthy part of our broader SA community.

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sent to
proponent email: plansasubmissions@sa.gov.au

Anne Wharton

I reject the Government's so-called "vision" for the Adelaide Park Lands. The Park Lands belong to the people of South Australia and should be maintained that way for perpetuity. I am absolutely opposed to any rezoning.

Now more than ever we need open green public space. COVID has highlighted the need for this and it has been further highlighted by the rapid infill and high rise apartments being built all over Adelaide with the concurrent removal of trees, vegetation and green open space. We need to be creating more open green public space, not to have it taken away.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage. Please protect this unique heritage.

Yours faithfully

Anne Wharton

Email: 

Anne-Marie Meegan



Dear Planning SA,

I object to the further organisation of the western end of the River Torrens near the weir.

Sure it needs some basic care, but no more organised structures or buildings.

I live in the city. There are plenty of other places lying derelict for future development.

Leave the park lands as Park Lands. It is our city 'wilderness'.

It is our exercise route and it is already too crowded at times with safety issues and lack of social distancing between exercisers and those that meander.

Yours

Anne-Marie Meegan

Annie Hastwell



Hi,

My question is who has the right to take public land from the people of Adelaide and South Australia?

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Annie Hastwell



Anonymous

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Anthea Taylor

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Anthea

Family name: Taylor

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The plan to repurpose two historic buildings for health facilities ensures that they will lose their tourism value, and conflicts with the consultation paper which outlined a plan to develop this precinct as a tourist destination. While there is no doubt that car parking will be needed for the new hospital, further loss of parkland space and a historic olive grove cannot be justified. The concept of a 'Riverbank Precinct' for the loss of precious open space in our city is unacceptable and I strongly object to the proposal to rezone the areas described from Adelaide Park Lands Zone to City Riverbank Zone/Health Subzone.

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sent to proponent email: plansasubmissions@sa.gov.au

Anthony Durkin

[REDACTED]

Dear Ms Sanderson,

I wish to record my surprise and disquiet at the rezoning proposals being pursued by your Government.

Given the level of their development to date it's surprising that we have the Parklands that we have.

These are not spaces for people to seek to exploit for their own profit. Even public construction on the Parklands needs to be restrained.

If these proposals proceed, the people will not soon forget which political party and which individuals had betrayed the inheritance of our beautiful city.

Car parks? Seriously?

I beg you and your government to reconsider.

With kind regards,

Anthony Durkin
Barrister

Villeneuve Smith Chambers
level 4 • shell house

[REDACTED]
[REDACTED]

Liability limited by a scheme approved under Professional Standards Legislation.

Anthony Laube

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Anthony

Family name: Laube

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: Please do not rezone the riverbank precinct - let it remain green and untouched.
The Council needs to join the fight to combat climate change by NOT pouring more concrete across green places.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Anthony Moore



TO WHOM IT MAY CONCERN

As a long term citizen of Adelaide and a qualified professional architect I am very concerned about the proposed Riverbank Precinct Code Amendment and the impact that it will have on a large area of Adelaide's parklands.

I find it difficult to understand why anyone would support a proposal that risks the loss of a large portion of parkland open space (even if some of that space is currently in a degraded state). I believe that it is very important for the parklands to be preserved for the enjoyment of current and future generations, not covered by buildings.

I suggest that if private enterprise or government wish to undertake development activities they should source and utilize land within the existing built up city zones rather than seeking to erode the parkland ring, one of our city's most unique and recognizable features. As has been demonstrated in the case of Lot 14 once a former parkland site has been developed it is extremely difficult (if not almost impossible) to return it to an open space area.

It is understood that the proposed changes are being "pushed" for two principal reasons:

- initially to allow the development of a new Women's and Children's Hospital (with associated carparking, etc.), and
- secondly to enable the construction of a new sports arena (that the current government proposes to erect if re-elected).

While the government claims that no other developments are proposed at this time it seems hypocritical for a statement of this generalized nature to be made. It is quite apparent that the proposed zoning changes will simply open the door for future developments, whether public or private or combined, placing a large section of prime parkland area at risk of being built over. Once this land is made available for development it will be virtually impossible for it to be returned to pristine parkland for the enjoyment of future generations.

The New Hospital

It is interesting to note that when Calvary Hospital was recently redeveloped the owners/operators selected to use existing land parcels within the city square mile rather than suggesting that they should take over public open space for their development. Why can't the government adopt a similar approach and seek to utilize land within the built up city area rather than attacking the parklands in what appears to be a very poorly thought through proposal that seeks to simply re-zone land and allow future development to spread out by stealth? How far will this sort of ill-considered spread be allowed to creep before it is recognized that the parklands have lost their integrity, intended purpose and heritage value?

It is almost unbelievable that the proponents of the proposed amendments appear to have no appreciation of the value of the parkland ring and the significant contribution that it makes to the very nature and character of Adelaide.

I acknowledge that part of the area to be rezoned has formerly been rail yards and that there are still a large number of active rail tracks running through parts of the area. While I appreciate that it is unrealistic to expect that the rail tracks could be removed, surely a creative designer/architect working with engineers and planners, who are capable of thinking outside the square, could utilize the air space over at least a section of the existing rail tracks to build a new hospital (and associated support facilities) without seeking to invade green space. Such a facility would be in close proximity and easily linked to the new RAH.

It is noteworthy to observe that the new RAH was designed as a low sprawling complex whereas other hospitals have elected a high rise layout with a much smaller footprint. Various governments have already allowed high rise buildings to be constructed in areas that were originally intended to be open space for the enjoyment of the whole community. By its very low profile nature the RAH development has already taken a large area that was originally intended as parkland space - an area that could have been remediated to reinforce the city's green ring.

Furthermore, the government in proposing to allow the redevelopment of the old goal precinct and other park areas towards Bonython Park, seems to be turning its back on a key part of our history. Do we as a community really want the old goal to be swamped by new multi-storey hospital and associated carparking structures rather than being preserved in a green setting which recognizes the existing horse paddocks and olive grove and opens the way for further remediation and environmentally sensitive upgrading of the area. Other sections of degraded parkland (i.e. the old SA Water area) have been successfully reclaimed over recent years enhancing various precincts.

The Sports Arena

I do not support the concept of building a new sports arena in the present economic environment, let-alone grabbing parkland area for such a project.

If such an arena is to be constructed I suggest that the government should be acquiring land in the built up city area. Such a land acquisition would no doubt be very costly and significantly alter the cost benefits that the government claims to be associated with the proposed project. At present it seems that the government feel it can simply grab public land - at no real cost to their proposed project. It is obvious that this situation can only result in a misrepresentation of the real end cost benefits.

I believe that the proposed entertainment zone should be remediated and returned to pristine parkland space possibly with a bushland feel/theme. Additional linkages could be created from North Terrace, across the existing rail tracks, enabling staff and patients from the hospital and other health facilities, staff and students from the nearby university, occupants of inner city residential properties and visitors to Adelaide to enjoy yet another unique environmentally sensitive space that is close to the city centre and within a comfortable walking distance.

General Comments

It disappoints that the proposed re-zoning appears to allow and foster the possible creation of a new "hub" (with cafes, dining venues, etc.) on the fringe of the city at a time when existing businesses within the city are already struggling to survive.

How does the government justify the economic viability of the proposed re-zoning when it seems that no consideration has been given to existing business operations within the city and the likely

impact a new “hub” would have on them. Surely it would be better to concentrate effort and funding on enhancing the appeal of the existing built up areas to promote existing business activities and encourage new ventures within under-developed/under-utilized areas of the built up city zones.

As a concerned citizen I request that the proposed Code Amendment be scraped and the areas of degraded land designated for rezoning be remediated and rehabilitated to enhance, rather than reduce, the areas of parkland surrounding Adelaide.

Thank you for your consideration of my views.

Yours sincerely

Anthony Moore

Architect and Company Director

Anthony Thomas AC

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Anthony

Family name: Thomas AC

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: There should be no destruction of the parklands on the northern side of the river. The southern side is a lost cause but that beautiful natural setting along the southern side of the river is a treasure that must be preserved at all costs. Adelaide does not need more cafes and bars. It has a natural vista seen from the convention centre that is beautiful and impressive, showing that we still have a soul. There will be many who see the chance to make a quick buck from building on the river bank but our parklands are far more valuable than any quick profit they can make. Remember the song: "they took paradise and put in a parking lot", a powerful message. Once the natural beauty is destroyed it's gone forever.

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sent to
proponent email: plansasubmissions@sa.gov.au

Ash McInnes

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ash

Family name: McInnes

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I agree with the re zoning as long as the old Adelaide gaol and police barracks are not included in this area. The gaol and historical area needs to be exempt.

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proponent email: plansasubmissions@sa.gov.au

Ashleigh and Rob Younger



My husband and I STRONGLY OBJECT to the proposed riverbank precinct development.

We cannot actually believe this would be even contemplated.

We are not anti development but do believe our parklands should always be protected and used for what they were intended... free open public space.

Adelaide is so lucky to have them... why nibble away until it's all gone???

I don't think Hyde Park in London or Central Park NYC would ever be carved up for hotels bars stadiums and restaurants.

We should look after them.. not destroy them.

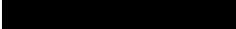
We are Liberal voters but this is testing us to the core. Along with the Cross rd Fullarton road expansion. Let's just rip up a few more trees.. widen the road and then funnel it all back into a two lane road.. what a brilliant idea.

Save the Parklands.

Regards

Ashleigh and Rob Younger.

Ashleigh Ryan



I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

I moved here 7 years ago and the amazing parklands are one of the many reasons I have stayed.

Parking and driving around this area is already a nightmare, why cause more congestion?

So many animals use these spaces as their homes too, I really hope this doesn't go ahead.

Yours sincerely

Ashleigh Ryan

Augusta Soteriou

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Augusta

Family name: Soteriou

Organisation: End2End Consulting

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Response to Proposed Code Zones/subzones: Oppose the Rezone to City Riverbank Zone and apply Entertainment Subzone, an Arena should not dictate the planning zones on such a picturesque and cultural significant parcel of land. Such an imposing structure squeezed into a parcel of land that will not meet the activation criteria expected by the State. An arena is a Destination Only venue and like the AEC and ACC outside of events are empty plazas. Oppose apply the new Riverbank Subzone definition along the northern bank of the River.

Attachment: Issues_with_the_location_of_a_stadium.pdf, type application/pdf, 635.8 KB

sent to proponent email: plansasubmissions@sa.gov.au

ISSUES WITH LOCATION OF NEW ARENA – PROPOSED AMENDMENTS TO FACILITATE THIS



Issues with the location of the Proposed Indoor Arena:

- There is no overall Strategic Masterplan with pedestrian, cycling, links that has driven this Arena;
- the new stadium would be grid locked by rail corridor to south; riverbank to north; parklands to west and Morphett Street to East.
- The Arena is a Destination Only building, activated only during events;
- General public view current Adelaide Convention Centre as intimidating and only destination venues;
- In the event of any future works to be undertaken to rail, flexibility is lost to have space and allocation of sidings to allow for maintenance of upgrade;
- This Entertainment zone needs to extend and encroach close to the Riverbank (to fit the Arena), a huge imposing structure that is not sympathetic to the environment;
- The Indoor Arena will have no street presence, it is back of house overlooking river and golf course
- **Indoor Arena is an enclosed venue with no windows and it's a building that is an INWARD looking facility** requires complete darkness and does not require natural light, no consideration and appreciation of external vistas or views and therefore does not respect and appreciate the setting its within.

There needs to be thought to respect the cultural significance of this Riverbank. Are great opportunities to create low level open space for all to enjoy ie integrate a permanent light cycles integrate cultural heritage (tourist), with lights and sounds tell the story.

Bailey Underwood



I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

The Riverbank, in particular, is an area of grave concern. It should resemble a natural river, not a concrete waterway similar to the Yarra or the Thames, abut with inward-facing stadiums and concrete buildings. No stadium should be built on the banks, as this would permanently erase the public green space currently afforded to residents and visitors.

Likewise, building a hospital carpark in open, green space is the antithesis of Adelaide's image as a carbon-neutral city.

Parklands should be democratic and accessible to all. This means keeping them public. And by nature, they should be parks: green and for public enjoyment among nature.

Signed,

Bailey Underwood

24-year-old, Property Owner, Local Resident, Community Member, ACC Ratepayer



Adelaide 5000

Barbara Ludwig

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Barbara

Family name: Ludwig

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I strongly oppose the idea of using the parklands for commercial development. This area along the River Torrens is a beautiful place to walk, ride a bike and enjoy the open spaces alongside the river. If developers are allowed to build in this pristine area of Adelaide, it will destroy the main purpose of having a parkland...to be used by the public for enjoyment in the natural world! Once a permanent structure is built, the park is destroyed. Do not allow this proposal to proceed. At a time when people need more natural spaces to explore it makes no sense to remove them. Leave the parklands alone!

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sent to
proponent email: plansasubmissions@sa.gov.au

Barry Westin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: barry

Family name: westin

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Opposed to new housing developments in the parkland if these are being proposed. Especially multi storey developments.

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sent to proponent email: plansasubmissions@sa.gov.au

Beck Hoffmann

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Beck

Family name: Hoffmann

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The protection of the old adelaide goal and its surroundings is so very important to our history, do not let anything happen to this amazing place please

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sent to proponent email: plansasubmissions@sa.gov.au

Becky Llewellyn

[REDACTED]

Dear PlanSA

Please find my submission on your Consultation.

Best wishes

Becky Llewellyn

[REDACTED]

[REDACTED]

I acknowledge Aboriginal nations as the First People of Australia. The land I live on was and always will be Aboriginal land.

Submission to PlanSA – Re-zoning the Riverbank

Becky Llewellyn (retired Director, Disability Consultancy Services Pty Ltd)

I have several concerns about the proposed re-zoning of areas along our main river, Karrawirra Parri/Torrens River. My background includes 18 years as the disability access consultant for all the major redevelopment projects in the Riverbank area, including the Adelaide Oval.

The main issue that PlanSA seems to have completely overlooked is the interaction of topography and the potential for a Disability Discrimination Act (DDA) 1992 complaint about the re-zoning.

Topography and Disability Discrimination

There are good reasons why the city's development has not extended through the Morphett St/Victoria Bridge. The city of Adelaide is built on a much higher elevation than the River and North Adelaide. Reconciling this fall is incredibly difficult but crucial to providing equitable movement throughout the proposed re-zoning precinct. Access in and around the 1870 Victoria Bridge and its feeder road over North Terrace from Hindley Street are the prime problem areas.

Access to developments in the re-zoning precinct around Morphett Street will risk exacerbating disability discrimination, forcing people who use mobility aids to go further, find circuitous routes and be disadvantaged to ambulant people who can take more direct routes, including stairs. There are obstacles on both sides of the river to sustaining a continuous accessible path of travel without steps. Any development without addressing circulation and equity of access puts the Government at risk of a DDA complaint.

South Australia was the first State government to feel the power of the Commonwealth DDA in 1994, when three wheelchair-using South Australians laid a complaint against the Minister for Transport, TransAdelaide and the Passenger Transport Board. Their complaint was that 178 new public transport buses would not have low-floor provisions and were not available for them to use, despite them contributing to the tax base for public transport. In 1995, the State Government lost its case against the disabled users and entered into a conciliated thirty-year action plan that now sees its public transport at the highest level of access in Australia.

The power of the federal legislation to overrule state provisions has been well-documented. Corporate memory in PlanSA may not have factored in this vital risk to proposed amendments. The south-north axis from the city to North Adelaide along Morphett Street/Montefiore Road is already discriminating to mobility aid users and development triggers upgrading to current standards.

What will be required if authorising re-zoning provisions that bring more pedestrians into this area is a detailed risk assessment and provisions for remediation before development is undertaken. Without that, the State is at risk of another high-profile DDA case being brought against it. That's not good publicity for SA nor a good outcome for participation by the whole community.

Good Access Exists on the south Riverbank

Although I am now retired, working with my husband, Richard Llewellyn AM as Disability Consultancy Services (DCS), I have contributed for many years to the existing accessible development of the Karrawirra Parri River Torrens area. Our first consultancy in this area was the 2001 east-west Promenade between North Terrace and the River. It developed an accessible 'spine' for development from the Adelaide Festival Centre on the east leading towards the now-fully redeveloped Adelaide Convention Centre on Morphett Street.

DCS has also given advice on all stages of the Convention Centre development, including along the eastern edge of Morphett Street and crucially, creating a public accessible lift on North Terrace that is an acknowledgement of the discriminatory change of levels for non-ambulant people.

The east-west Promenade stopped at Morphett Street. On the west side of this road, DCS was also the consultant for the UniSA Cancer Research Institute building, with its innovative access bridge from the Morphett Street Bridge into an upper level of that building for people who cannot use the extensive stairs up from North Terrace.

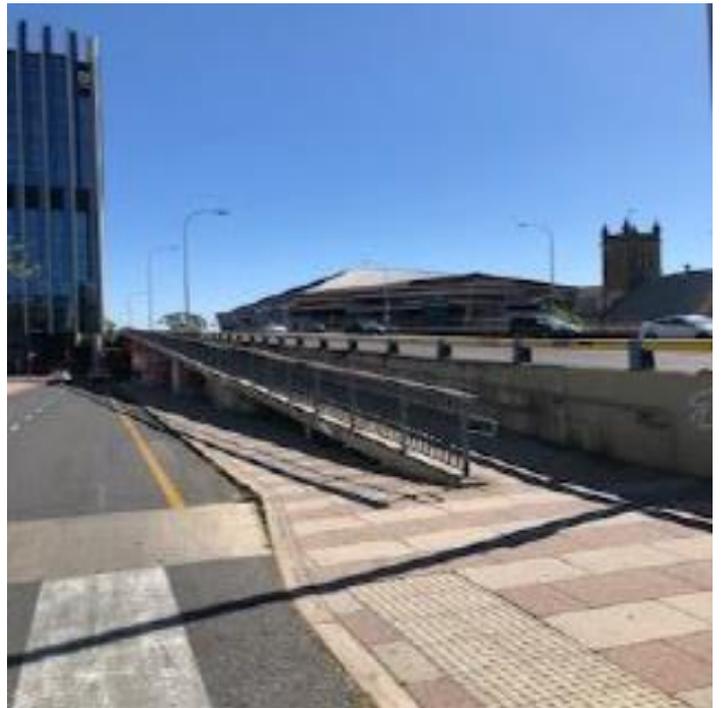
Buildings can only do so much. What is needed if the re-zoning proceeds is a bigger vision to fix pedestrian access routes around Morphett Street and the River area to match the levels of access expected by the Adelaide community. What follows is an indicative look at some of the access issues described going in a loop north clockwise from Hindley Street/Morphett Street west.

Access to Proposed Zone from Hindley Street West

The only ramp access to the Morphett Street bridge from the south is on the west side of Morphett Street, going north from Hindley Street as the roadway ascends over the rail lines and River.

There is a wide zebra crossing marked on the feeder road between Hindley Street and North Terrace, adjacent the Jam Factory and the Mercury Cinema. It has adequate tactile ground surface indicators.

The entry to the approximately 70m long ramp, leading up to the Morphett Street Bridge (which spans North Terrace at its crest) is via a concrete ramp 1560mm wide with handrails on each side. It consists of five 11m long sections coming up from the crossing by the Mercury Cinema and a final 8m section before the section over North Terrace.



Each 11m section is separated by required landings 1440mm long to give people a rest. The gradients are mostly less than 1:20, although some sections are only 1:18. There are no passing spaces on this ramp leading to the elevated level. It also lacks tactile ground surface indicators on the top and bottom.

The handrails are only 30mm diameter and are located 740mm high, much lower than today's access code provides. Current handrails are recommended to be between 30-50mm and be 865 – 1000mm from the ground surface.

The main issue with this ramp, besides its length and slope for someone with restricted energy is that there are no areas for passing spaces nor resting spaces. If a wheelchair user wanted to go down at the same time as someone was going up, which is a possibility when you are talking about major crowds going to a Stadium on the western side of the bridge, they would not be able to pass each other.

Regulations for passing spaces for wheelchairs call for a minimum width of 1800mm for a minimum length of 2000mm. This ramp, the only ramp in the proposed re-zoning area, is insufficient to meet needs of crowds coming from or going to the Stadium from Hindley Street for people going in the two directions at once.

Access to Proposed Zone from North Terrace west side



There is no street access from North Terrace under the Bridge to the upper level. The UniSA Cancer Research Institute has a wide set of stairs with narrow strip for bike users to wheel their bikes.

Wheelchair users who want to get to the top level either need to go further back up towards Hindley Street to join the access ramp previously described or go further forward on North Terrace to take the Convention Centre lift up to the top level.

Western crest of the Bridge and north to Montefiore Road

The footpath widens to 2370mm at the Bridge itself which has a gentle arc shape over North Terrace and rail lines. The width is slightly impeded by the new screens that prevent rock-throwing over the railway tracks.

This is adequate width for pedestrians to pass each other and the gradient is not stressful. If the Stadium, goes ahead, it will hold events at night. Lighting is provided by the existing street lights but could be improved with handrails and lighting underneath, as in the Riverbank Bridge.

To date, there has been little motivation to improve this path because of the lack of development. It has a short concrete section coming off the bridge, leading to much steeper 2m wide bitumen pathway with gradients of 1:15 to 1:20, mostly 1:18, which are acceptable gradients.

The Morphett Street bridge on the western edge over the railway tracks leads to a wide driveway, the outlet of Festival Drive, called Riverside Road on a street sign.

Currently there are non-compliant ramps on either side of this outlet, pushing people using mobility aids or white cane users out towards the bike lanes on both sides of this road.

Getting people safely through the Festival Drive/Riverside Road area and improving pedestrian circulation from its current poor standard is a traffic engineering challenge if larger crowds are expected on this western edge of Morphett Street and Victoria Bridge.



Across Riverside Road, the Victoria Bridge over the River Torrens has durable pedestrian protective bumpers with 1400mm openings at each end.

This is adequate for normal pedestrian traffic but limiting if big crowds are using this footpath over the Karriwirra Parri. They could be pinch points where people could be shoved from behind if it takes them longer to get through with their mobility aid or wide baby stroller.

Analysis of space requirements and traffic flow of pedestrians should examine these accessways for safety in crowd situations and remedy if required by the assessment.



West side, north intersection – War Memorial Drive/Morphett Street/Montefiore Road



This intersection has code-compliant pedestrian crossings on both the southern sides. On the north side, however, there are no kerb ramps on the north-western golf course corner. This corner needs to be improved for pedestrian footpaths generally. It would also be an aid for the hundreds of people who park on War Memorial Drive to access the city, Adelaide Oval or Memorial Drive Tennis Courts.

The path on the southern side of War Memorial Drive also leads to a plaque memorialising Pirtawardli (meaning possum home), the early Kurna school established by Lutheran

missionaries Schurmann and Teichelmann near the modern-day weir restaurant, the River Café.

Nearly all of the recorded language and early written records of Kurna culture stem from this important place, yet it remains virtually unknown to Adelaideans. There are layers of Kurna heritage all around this area and as a minimum, the plan should protect and enhance features that are acknowledged by the Traditional Owners to be of significance.

Eastern footpath from the Adelaide Oval/Memorial Drive Tennis Courts on Montefiore Rd

The footpath coming back from War Memorial Drive to the city on the east side leads to three flights of stairs that come up from the Torrens Linear Park shared bike path north of the River. This array of steps is in poor condition. There are no tactile ground surface indicators and the handrails look very unsafe.



There is no equivalent access provided or signage of alternative ways to reconcile the levels. The principle of the DDA is that if one set of people can use a facility such as stairs, alternative provision should be made for people who cannot use them.



The eastern footpath coming from North Adelaide back into the city has the same treatment as the western edge on the 1870 Victoria Bridge, with robust pedestrian guards on the road side of the footpath and 1400mm wide entries and exits.

This is fine for sparse traffic, but as noted above, requires safety experts to assess for potentially crowded conditions in the future.

North of Victoria Bridge eastern side – Adelaide Convention Centre interface with Morphett St

There is a set of steps coming up from the southern Torrens Linear Park path by the boat sheds. It is in better condition than the steps on the northern side with longer landings making it less steep, but still has the problem of equity – where is the alternative for people who cannot use steps?





The crossing at Festival Drive is plagued with non-alignment of kerb ramps and an intrusive island also blocking a continuous path for white cane users. The centre of the island has a non-compliant slope to deal with water run-off which makes it a dangerous crossing for mobility aid users who do not have trunk control or have balance issues. This needs correction on a potentially busy route.



The Adelaide Convention Centre has code-compliant access from north of Festival Drive. A ramp with a 90-degree landing reconciles the different level from Festival Drive to the Convention Centre footpath. It is 1200mm wide when the minimum code is for 1000mm and has contrasting tactile ground surface indicators and appropriate handrails.

There are four bus bays with level access for unloading ramps on Convention Centre forecourt.

Crossing North Terrace from the upper level of Morphett Street on the eastern side

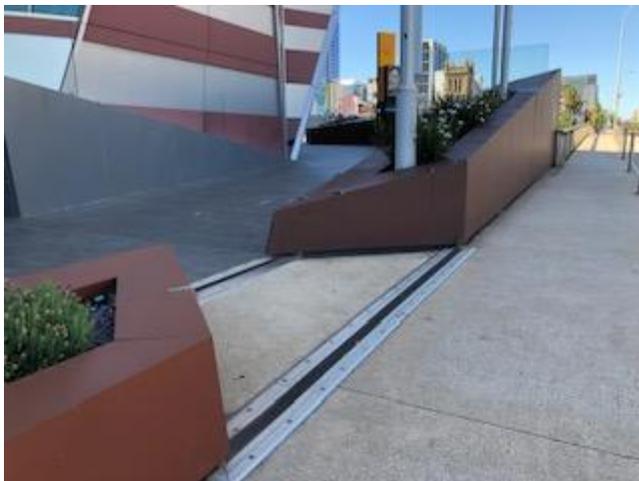
The most obvious access hurdle for a mobility aid user coming back to Adelaide from North Adelaide is the lack of a ramp on the eastern side of Morphett Street. Instead, without any signage back where a decision needs to be made, a person is confronted with this sign and graffitied steps, non-compliant chunky square handrails and most dangerously, no tactile ground surface indicators:



This is hardly up to Adelaide's standards as a top global liveable city. For visitors with disability or who don't know the area, they have gone past an accessible option provided by the Adelaide Convention Centre, their external lift adjacent to the large staircase.

But there is no signage or indication of how to find a way to get down to the North Terrace level. A mobility-aid user needs to go through the baffles (pictured below left) while approaching North Terrace and follow the Convention Centre forecourt through to the external lift shown here at night.

Located next to the large illuminated staircase, these two choices go hand in hand for mobility to change the levels between North Terrace and the bridge for ambulant and non-ambulant people.



This is one solution to access between the levels at North Terrace. It has been provided as a public service by one building, noting the problem described above. A person has to get to the north side of North Terrace to use it.

It is not necessarily the answer to the precinct's problem – the lack of a ramp on the east side from Hindley Street. There are known problems with reliance on lifts for sole access – overheating in summer, electricity blackouts, public-inflicted damage and maintenance issues. Some people have phobias about using them. Waiting times blow out when there are crowds, including families with pushers. It is a shared use facility, but not always easily accessible for all.

A purpose-built pedestrian ramp in this area is long overdue on the east side of Morphett Street and would ameliorate many issues on the south-north access to the Riverbank.

Morphett Street underpass with graffiti and motorcycle parking on the south of North Terrace

A wheelchair user coming from King William Street on the south side of North Terrace crosses into this rather scary underpass, albeit aesthetically better than it used to be. To get to the ramp by the Mercury Cinema in order to cross over North Terrace, a person has to squeeze around bridge pylons with a minimum 1000mm footpath, along a very narrow carriageway to the ramp.



The wide slip road coming down from Hindley Street next to the Lion Arts Factory has taken precedence over adequate pedestrian width along this important accessway. There is no signage to urge people to cross the slip lane to the west side along the Factory. In my opinion, this narrow path should be removed and the extra width given to the Lion Arts Factory footpath.

The whole pedestrian access around this area is compromised by the two slip lanes coming off from and into North Terrace. Using the east side isn't possible to go up to Hindley Street, given the road configuration, so there is no access along Holy Trinity Church. Vehicles have taken precedence in planners minds.

The idea of a Stadium along this road access however means that pedestrians will be moving back into the city for parking, food and drinks and socialising. Currently the pedestrian choices for mobility aid users are poor and require them to go further than non-disabled pedestrians. No planning appears to have been done for these vital linkages that feed into the PlanSA vision.

Language and Policy Oversights

The PlanSA proposal does not mention or make provision for the range of diversity within our community or acknowledge that attention will need to focus on people's various abilities to navigate the Riverbank area with equity. This plan also lacks respect of another important group of people, more than stakeholders, the living and past generations of Kaurna original inhabitants.

An obvious sign of this neglect is that consultation documents make no mention of the dual-name of the river. It was officially dual-named Karrowirra Parri River Torrens in 2001. In twenty years since, there has been plenty of time for planners to integrate this into their reports, their plans and their visions.

It is not dual-named lightly. 'Red gum forest river' is a beautiful name and offers a wonderful suggestion of how this new re-zoning could work to live up to its name, with huge planting efforts to restore the river red gums along its banks and environs. The unique and inspiring Adelaide Airport forecourt shows new visitors that Adelaide is the home of river red gums. New plans could return the Karrawirra Parri to banks full of the myriad of insects, birds, reptiles and bees who would populate new trees. There has already been some planting but there could be much more to make this Green Adelaide, a more natural and cooling system for our city. That would be a legacy.

When embarking on such wholesale changes to the Riverbank environment, there should be reference to the lead agency and its policies on how to make change. The Department of Premier and Cabinet's strategic goal is to lead whole of government policy, major initiatives and projects that deliver outcomes in line with the Premier's and Cabinet's priorities.

They further emphasise that; "We believe that meaningful relationships between Aboriginal and Torres Strait Islander and non-Aboriginal and Torres Strait Islander people, agencies, and communities are based on trust, understanding, and real actions that lead to shared positive outcomes for all of us."

Plan SA, as an instrumentality of the SA Government, seems very far from the vision for Reconciliation espoused in the Department of Premier and Cabinet Reconciliation Action Plan:

"We will:

- Value and celebrate Aboriginal and Torres Strait Islander lives, communities and cultures from across Australia
- Honestly acknowledge the truths about Aboriginal and Torres Strait Islander experiences in post-colonial Australia
- Foster mutual respect between Aboriginal and Torres Strait Islander and non-Aboriginal and Torres Strait Islander people and communities
- Support the economic development and self-empowerment of Aboriginal and Torres Strait Islander people and their communities."

There is nothing in the PlanSA Draft Riverbank Precinct Code Amendment that leads me to think that the Kurna people, Traditional Owners of the riverbank area are being valued and celebrated. Media reports this week show a belated, panicked awareness of this major oversight. It is their place.

Re-working the Plan should incorporate the dual-name or simply call it Karrawirra Parri instead of River Torrens after a man who never even came to SA. This naming would go some way to alerting every stakeholder, visitor, user of the space that it is Aboriginal land, not just a new set of colonists set on making profit from their land, the original stain of dispossession. Using the proper dual-name also shows respect and honesty. We Europeans, with the imprimatur of King William IV, stole this land in a process which is still formally unacknowledged. Making plans to re-zone it for our use without acknowledgement of this action builds on very shaky moral and legal foundations.

Legacy

Colonel Light designed the Park Lands green belt for the future. Instead of fighting to preserve Adelaide's riverbank area as a unique asset unlike the over-developed riverbanks in other States, this Plan proposes a kind of mini-me, 'let's make a Southbank' sort of

development, without any charm or safeguards. Adelaide is unique. Our Park Lands and Karrawirra Parri River Torrens make it so.

Legacy. Is this Government going to be known as the ones who gave up the Park Lands willingly, our precious community asset? The legacy will be much greater in the long run for standing against this proposal that essentially gives up the land forever.

Becky Llewellyn, retired Director, Disability Consultancy Services

Henley Beach

24 October 2021

Belinda Sheldrick

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Belinda

Family name: Sheldrick

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This is yet another example of this appalling Government attempting to prosecute a miserable public policy failure. When will the Government start governing for the people instead of commercial interests. Hands off the Parklands. They are for all South Australians' consumption, not just your mates! It's just like the Government's approach to COVID – sell out on South Australians' health, economic welfare and quality of life for commercial interests. The Government should be ashamed of itself: • it has failed to call for prophylactic and early treatment of COVID (Ivermectin/hydroxychloroquine, vitamin D, vitamin C, zinc, quercetin, melatonin, nasal and mouth washes) • it has failed to defend the use of Ivermectin for COVID, knowing that it is a potent antiviral, being successfully used in many countries, and having been demonstrated to be effective in trials (see bird-group.org or the FLCCC if you've had your head in the sand) • it has failed to call out the lack of efficacy of vaccines in neutralising COVID, thereby failing vulnerable groups and enabling the start of medical and economic apartheid in Australia • it has failed to call out the strong safety signal in relation to the COVID vaccines, leading to the needless, disastrous immediate side effects being experienced by people (death, paralysis, stroke, heart attack, ...). The magnitude and scope of the long-term effects are yet to be realised but the warning signs and conceptual possibilities are already being reported. It is extraordinary that children are being vaccinated. Do not continue with the proposed plan to render parts of the Parklands available to only a few, when the honourable intention at the time of their creation was that it was for all to enjoy.

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sent to
proponent email: plansasubmissions@sa.gov.au

Ben Ayris

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ben

Family name: Ayris

Organisation: Affinity Wealth Advisers

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I would encourage more use in the riverbank area and increase the hospitality options such as cafes and bars however I would not like to see it over developed. It is hard to get the balance right but what I can say is the area is seriously lacking good quality hospitality venues currently and these are needed to bring people to the area. If cost was not an option I would like to see the river widened and some permanent restaurants and bars on the riverfront.

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sent to
proponent email: plansasubmissions@sa.gov.au

Ben Smith

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ben

Family name: Smith

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please leave the parklands alone. There are many things you could focus on to make Adelaide more liveable - it has become a horrendous, traffic dominated city over the last 10 years. Green space is essential - once built on, it is lost forever.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Ben Taylor

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ben

Family name: Taylor

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I find it unbelievable that the government wants to commercialise and develop more of the parklands and that I am therefore compelled to lodge this submission. The residents of Adelaide are sick and tired of having this fight. It is divisive and completely unnecessary. Every square inch of the parklands should be permanently protected as parklands - that is, open space for the benefit of all. We can still have events and temporary structures, but building more unnecessary permanent structures in the parklands is madness - just look around the CBD and inner suburbs at the number of vacant commercial premises. When will you get over your identity crisis, stop trying to be Melbourne, and rejoice in being Adelaide. Please just leave the parklands alone - we love them as they are.

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sent to
proponent email: plansasubmissions@sa.gov.au

Benjamin James

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Development Industry

Given name: Benjamin

Family name: James

Organisation: Curtin University Sustainability Policy Institute

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The Amendment offers opportunity and risk. The Riverbank Precinct balances the city's other precincts by acting as a destination of contrast to its surrounds - being open and geographically interesting, hosting clean parks, and providing flexible-use spaces. I support majority of the sub-zones' inclusion in The Amendment except that of the riverbank itself, unless greater community collaboration is made and greenspaces are maintained and protected. I welcome collaboration and offer future consultation from my team at the Curtin University Sustainability Policy Institute (partially based in Adelaide).

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sent to proponent email: plansasubmissions@sa.gov.au

Submission two:

From: Ben James
Sent: Wednesday, 27 October 2021 3:31 PM
To: plansa@sa.gov.au
Subject: RE Riverbank Precinct Code Amendment

To PlanSA and the South Australian Government,

Regarding the initiatives for developing the Riverbank Precinct, I have some proposals.

A collaboration between the South Australian Government, the Adelaide City Council and my institutions – Curtin University, the University of Adelaide and RACE2030 – can render Adelaide as a world-renowned sustainable and carbon-positive city.

Most things can be created, but this situation and opportunity is unique. The timing of this development amongst the world's race to carbon neutrality coupled with the unique asset of Adelaide's parklands offers the city and the state the opportunity to inspire metropolitan development globally. This is increasingly important and lucrative as 60 percent of the global population will live in cities by 2030 and 70 percent by 2050. The world will eventually adopt sustainable cities in the sixth wave of innovation, and while South Australia has started, the state can continue and establish itself as a global leader with Adelaide as its crown jewel.

The Adelaide Parklands offer a level of liveability to the city unlike any other in the world and must be maintained.

In review of the proposed changes outlined in 'Planning for Adelaide's Riverbank Precinct', there are some concerns. The Amendment offers opportunity and risk. The Riverbank Precinct balances the city's other precincts by acting as a destination of contrast to its surrounds - being open and geographically interesting, hosting clean parks, and providing flexible-use spaces.

I support majority of the sub-zones' inclusion in The Amendment except that of the riverbank itself, unless greater community collaboration is made and greenspaces are maintained. The green and shaded spaces offer balance to the city and serve the community and visitors alike with its freshness and breathability.

I welcome collaboration and offer future consultation from my team at the Curtin University Sustainability Policy Institute.

Balance is tricky, but ultimately most rewarding.

Benjamin James B.E.(Mechanical and Sustainable Energy) (Honours)

Research Assistant, Sustainability Transitions and Urban Development

Curtin University Sustainability Policy (CUSP) Institute | School of Design and Built Environment

Mobile | [REDACTED]

Email | [REDACTED]

Web | <http://sustainability.curtin.edu.au>

Bernadette Reilly



I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Bernard Flaherty

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Bernard

Family name: Flaherty

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am totally opposed to any development of the public space of the parklands. This open space is precious and must be protected as such. There are plenty of private buildings that are adjacent to the parklands which can be purchased and redeveloped if the perceived need is that great. Bernard Flaherty

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sent to
proponent plansasubmissions@sa.gov.au
email:

Bernard O'Neil

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Bernard

Family name: O'Neil

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The alienation of more of the parklands should not be countenanced. Having a stadium on land that could be rehabilitated and utilised for public benefit is not essential - if there is a business case for such a stadium then let the business sector build it and operate it (e.g., on the former West End Brewery site). Another hospital - refurbish and expand the existing one. The area west of the Morphett St bridge needs opening up, not 'filling in' - the medical hub buildings disconnect the river and environs from the city and access to the river via bridges/overways and walkways would make for better use of that area. Having hospitality and retail venues east of the Morphett St bridge is unappealing to those who value public benefit over private profit. This proposed rezonings reek of a land grab that will destroy the uniqueness of the amenity. In the many years that I have used the parklands, including the riverbank precinct regularly, I am yet to hear of the actual users requesting the types of changes that are being proposed. And as for climate change and the necessity of more not fewer green/open spaces, we don't need more concrete and asphalt being laid down. What is required is strong leadership by the government, indeed by Parliament, to preserve the parklands and to prevent incursions such as those in the proposed rezonings.

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sent to proponent email: plansasubmissions@sa.gov.au

Beth Newman

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Beth

Family name: Newman

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: Stop taking the public's green space. It's what makes Adelaide so special. The hospital stole what could've been regenerated parkland. Put the economic energy back into the CBD area. The CBD area is looking pathetic, many closed shops and a lack of people.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Beverley Paine

I am opposed to the re-zoning of any part of the Adelaide Park Lands and in particular the proposed re-zoning of the Riverbank Precinct.

It is vitally important to the vibrancy and life of Adelaide and South Australia that the nature of the Parklands remain a free greenspace to be enjoyed by all in perpetuity.

Re-zoning opens the way for multi-purpose development in the near and far future and would destroy the leafy green natural environment that makes our city stand out as one of the most liveable places in the world.

More than ever we need wide green spaces and zones to buffer the heat experienced in the warmer months of the year, a period of time set to expand. We need cool, shady green spaces to provide calm, reflective and peaceful places for people to recreate – doing so will help to promote and protect our citizens' mental health.

Our greenspaces around the city and, in particular along the Riverbank Precinct, are well known to international and interstate visitors to Adelaide and much loved by them.

These areas should not be exploited and sacrificed as if they vacant development sites – they are not – they are the heritage of our wonderful capital city, delivered to us by the foresight of our early pioneers and settlers.

Please add my voice to the growing number of citizens of South Australia opposed to this proposal to re-zone the Riverbank Precinct and Adelaide's Parklands.

kind regards
Beverley Paine
Yankalilla

Bill Prior

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Community Group

Given name: Bill

Family name: Prior

Organisation: SA Police Historical Society Inc

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments:

COMMENTS: I am the President of the South Australian Police Historical Society Inc (SAPHS). On the basis of the information supplied, the SAPHS wishes to indicate that it is opposed to the proposal to rezone the Thebarton Police Barracks. At this time we have not seen any evidence that the proposed rezoning provides us with any benefits, particularly in regards to our longer term occupancy of our current heritage listed buildings at the Thebarton Barracks. REASONS FOR OPPOSING THE PROPOSED REZONING We understand that there is no current intention to demolish any of the historical buildings within Thebarton Barracks. However, we are extremely concerned with the stated intention to 'examine the buildings to determine if there is scope for future use of the land, consistent with the heritage values of the locality through adaptive reuse'. The Police Historical Society has spent the past 20 years developing the Police Museum to its current high quality. We constantly receive high quality complements from those who visit the Museum for the first time. Most visitors are amazed by the vast range of exhibits contained within the Museum The Historical Society needs to have confidence that the current Museum buildings will continue to remain within the general management of South Australia Police. Thebarton Barracks is an operational policing precinct and is contained within a restricted and secure perimeter. This provides a great deal of security for the many extremely valuable and irreplaceable items on exhibit within the Museum. The Thebarton Barracks buildings were purpose built for policing purposes. As a Historical Society, it gives us an added 'genuine feel' when taking tour groups through the historic buildings. The impact of walking through a historical building cannot be provided in modern buildings It is our view that the Thebarton Police Barracks and the Old Adelaide Gaol should form a stand-alone historical precinct.

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sent to
proponent plansasubmissions@sa.gov.au
email:

PLANNING AND DESIGN CODE AMENDMENT SUBMISSION

NAME: William Laurence PRIOR
ORGANISATION: South Australian Police Historical Society
ADDRESS: 1 Gaol Road, Adelaide SA 5000 (GPO Box 1539 Adelaide SA 5001)
EMAIL: historical@police.sa.gov.au
Phone: [REDACTED]

SOUTH AUSTRALIAN POLICE HISTORICAL SOCIETY INC.

BACKGROUND

The South Australia Police Force was established on 28 April 1838. It is the oldest State-based Police Force in Australia and some researchers claim that it is the third oldest centrally controlled Police Force in the western world.

The South Australian Police Historical Society was established in December 1977, with the purpose of collecting, recording, maintaining and promoting the history of the South Australia Police.

Thebarton Police Barracks were formally opened on 1st March 1917. The Barracks were purpose built as a 'home' for the Mounted Division of South Australia Police. Each of the separate buildings included in the original design remain and each is heritage listed. In 2021, the Thebarton Barracks remains the 'home' of the Mounted Operations Unit.

Thebarton Barracks is also the location in which the South Australian Police Historical Society operates a Museum which consists of 5 separate display Galleries, an Administration area, a comprehensive Archives collection area and a general meeting room/training complex. One of the Galleries contains in excess of 20 historical police vehicles. Another building contains a large collection of historical items, artifacts and records that cannot be exhibited within the Museum.

Each of the remaining buildings within the Thebarton Barracks are currently occupied and used by various operational units of the South Australia Police. I do not intend to put forward any arguments in relation to those areas.

THE ROLE OF THE SA POLICE HISTORICAL SOCIETY INC.

The South Australian Police Museum is the largest Police Museum in Australia. It also contains the most comprehensive display of police related artifacts of any Australian Police Museum.

Most of the display is dedicated to the South Australian Police. However, there is one area dedicated to an international police display. It has been indicated by a number of visitors to the Museum that this International display is the most comprehensive in the Southern hemisphere. In fact, the French Police display is the most comprehensive outside of France.

The South Australian Police Historical Society Inc is operated entirely by volunteers. There are approximately 300 members of the Society. Of these, approximately 70 members are registered as formal volunteers who give their time to conduct the Affairs of the Society. These duties include:

- supporting SAPOL by organizing and/or assisting at major events such as:

Foundation Day (28th April each year)
National Police Remembrance Day (29th September each year)
Police Anzac commemorations
Annual Open Day (suspended in 2020 and 2021 due to Covid)

- providing tours through the Museum
- cleaning the Museum
- servicing the vehicles within the vehicle gallery
- conducting research on behalf of the many people who make enquiries about officers from past eras
- collecting and maintaining historical uniforms
- digitizing historical photographs
- producing a bi-monthly magazine

In addition to the activities conducted at the Therbarton Barracks, many members of the Police Historical Society undertake a series of activities, including driving historical vehicles to Community events and attending community organisations as guest speakers.

Collectively, the volunteer group performs in excess of 10,000 volunteer hours annually.

Bjoern Malessa

Dear Ladies and Sirs

I strongly object to rezoning of Parkland. I value the green belt around Adelaide, that makes Adelaide unique. The parklands were instigated to the enjoyment of all and should not be built on or used for housing.

Kind regards

Bjoern Malessa

Bonnie Claassen

Dear Premier Marshall

I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks.

Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours sincerely
Bonnie Claassen

Bradley Barrett

To whom it may concern,

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards,
Bradley Barrett

Brian Bailie

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Brian

Family name: Baillie

Organisation: n/a

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I most strongly OPPOSE the pproposed planning code changes for the Riverbank precinct, other than those needed for the hospitals. Once again this government AND its planniong advisers simply cannot grasp the critical importance of preserving our heritage parklands as open, green spaces which are a higely important natural backdrop to the otherwise geberally built environment of the CBD. Why on earth do you think geen sopaces require structures to enhance them??? It is just so absurd, and distressing; particularly knowing that my objection, or any objection, will not make the slightest difference. People like and need open space, not man-made entertainment in every corner of the landscape. Our parks are slowly but surely being turned into cheap development sites for various vested interests. Shameful!! Please DROP the proposal. Thank you.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Bridget Price

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Bridget

Family name: Price

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

The Park Lands as parklands are of vital importance to Adelaide and State. I oppose rezoning to permit uses and buildings that are incompatible, inconsistent and contrary to the use of the proposed areas as other than parklands. This is a reprehensible attack and takeover by state government of the heritage and culture and the state government should look outside the Park Lands for land if it wants to spend taxpayer money on an entertainment arena and all that goes with an entertainment arena. I cannot believe that this state government wants to reduce the amount of land that is given over to Park Lands - leave it alone - please! The Park Lands are valuable. They provide a huge benefit to Adelaide, to the city and to the state. They should remain public and accessible and in this time of climate change and thinking more about our environment, they will become even more valuable and important in the future for future generations. That is why there is a Park Lands Act - to protect and conserve the Park Lands for everyone. I object to the Code Amendment. I object to putting yet another hospital on Park Land - fix up the hospital where it is now. I object to the entertainment zone. I object to the arena on the Park Lands. I object to the innovation zone and changing Frome Park. I object to putting structures and commerce etc along the riverbank. For goodness sake State Government, leave the Park Lands alone - get out of the Park Lands! Go buy land in commercial and business zones and contribute to the city like everyone else. That might cost a few extra dollars, but is far more effective and inexpensive than taking public parklands from the public and from the city. I find it unbelievable that there is any sort of proposal for a huge car park on Park Lands. If you want a carpark for a new hospital build it underground!! Of better still, stay out of the Park Lands. I do not support the Code Amendment. It will be a SAD day if Minister Vickie Chapman allows this to happen.

sent to
proponent
email:

plansasubmissions@sa.gov.au

Briony Hunt

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Community Group

Given name: Briony

Family name: Hunt

Organisation: City South Association

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: Please find attached the submission from the City South Association.

Attachment: Submission_from_the_City_South_Association_regarding_the_proposed_changes_to_zoning_of_the_Adelaide_parklands_2.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 30.0 KB

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plansasubmissions@sa.gov.au

Submission from the City South Association regarding the proposed Riverbank Precinct Code Amendment.

The City South Association makes the following submission from the perspective of the value and importance of the Adelaide Parklands to the health and well-being of the community, the identity of Adelaide city and the importance of support for small and local businesses in our area of the city.

In doing so, we do not believe the proposal does not solely impact on communities, organisations and businesses in close proximity to the Torrens Riverbank precinct. The Adelaide Parklands create a unique cityscape that is recognised nationally. There is specific legislation to safeguard the

parklands for the people of Adelaide and South Australia and the Adelaide City Council has a clear role as custodians to protect the parklands as green space for the benefit of the community.

The south west of the city is largely a residential area with an increasing number of small local businesses, including hospitality, retail, food and creative industries. Lifestyle and community are important to the people we represent. Housing density is rapidly increasing with the development and approval of high rise and median density housing. In the southern and western parts of the city, there are now few public spaces and private gardens. The riverbank is therefore more important than ever as a free, publicly accessible open space for residents and is now well- linked by tram and on the route of the free city bus between the south and the north of the city. Electric scooters and bikes have also increased the connection between the Riverbank and the south west corner of the city.

The Riverbank has always been a space open to all as a place to walk, sit, picnic, have community events such as fun runs and festival events for example, Adelaide festival and fringe, Feast Festival etc. It provides a beautiful and unique green, open vista which frames the arts and cultural precincts and the Adelaide Oval. From the Royal Adelaide Hospital, patients can see trees and parks and access fresh air which helps with their recovery.

The timeframe and scope of consultation

The proposed amendment to the code of the Riverbank precinct is a radical shift in policy and land use, yet the process of consultation and public awareness has been extremely short, lacking in transparency and detail, and not inclusive of all those impacted by the proposal.

We believe all residents and businesses in the City of Adelaide should be notified directly by the Planning Commission about this proposal and their feedback sought as it has implications for everyone.

It is our understanding that the Kurna people, as the traditional owners of the Adelaide Plains have not yet been consulted. We believe this should have occurred as one of the very first steps in consultation. The areas identified for possible development are important to the Kurna people and this consultation needs to occur in an appropriate way and not rushed.

Conflict with the objects of the Adelaide Parklands Act

It is unclear as to whether the Planning Act can over-rule the Adelaide Parklands Act 2005 (APA). The APA has very clear objects and the Adelaide Parklands Authority has very specific responsibilities under this act to protect the parklands.

If proposals under the SA Planning Act are able to contradict the APA, and are able to over-ride decisions of the Parklands Authority, inappropriate development could easily occur in other parts of the Parklands. This is of grave concern as it puts the whole of the Adelaide Parklands at risk.

As part of the Adelaide Parklands Act 2005, there is a requirement of the Parklands Authority to regularly publish a plan for the parklands. This has been done and is available on their website. The proposal to amend the code for the riverbank precinct does not comply with the current plan.

There needs to be a clarification of the relative powers of the Adelaide Parklands Authority, the SA Development Commission, the Adelaide City Council, State Government and how these bodies relate to each other. It does not seem right that the SA Development Commission can so easily change a zone in the Parklands area without the agreement of the various bodies attached to the

management of the Adelaide Parklands or at the very least, a parliamentary process which allows for debate.

Well-being and health of Adelaide city residents

It is well known that open spaces and a clean environment contribute to the health and well-being of people. Community spaces that allow for people to feel connected to others are also crucial, especially in cities. Adelaide was declared the most liveable city in Australia and the third most liveable city in the world in the Economist's Global Liveability Index in 2020. The parklands and city landscape, including the Riverbank and the river are very much part of this.

We are unique and have a unique history as a planned city. At the time of planning, parks were considered important for the well-being of its citizens by the visionary early developers. This remains true today.

Historical and cultural impact

Areas impacted by the proposed amendment to the code have significant historical and cultural importance which would be lost if it proceeds. The plans for the new Women's and Children's Hospital were recently viewed by representatives from our Association at an Adelaide City Council meeting. These plans include a multi-storey car park on what is now the bottom end of Tulya Wardli Bonython Park which currently contains the Adelaide Gaol and the Olive Grove.

Both the Adelaide Gaol and the olive grove have historical significance, not just for that corner of the city but also in the social history of the city of Adelaide and South Australia. The proposal intends for the Adelaide Gaol to be preserved as it has a heritage overlay, however the olive grove is also of historic significance as this was one of the groves planted in the very early days of the colony. The olives were harvested by prisoners and local Aboriginal people and crushed at the gaol in the only oil extracting machine in South Australia at the time. Adelaide Olive oil won a prize at the London Agricultural Fair in 1851 for its purity. These trees are over 150 years old. At the moment, the Police Greys also graze in the grove making it a very special for families and children as it is an area with a good playground and space for games and picnics.

Pinky Flat is culturally significant for the Kurna people as a meeting place for thousands of years. Kurna elder Aunty Josie Agius, who has now passed away, often spoke about the significance of this area when she welcomed people to country.

Impact on business

Attracting customers for small and medium sized business in the south west of the city is already challenging. Creating yet another commercial precinct in the north of the city centre shifts our small available population away from city south for entertainment and food. The better model for small business is to create precincts and main streets linked with public transport so people are attracted into all the areas of the city to support local business. How is the proposal intended to support current businesses which are struggling post the impact of COVID?

Adding the possibility for further commercial development on the Riverbank without considering this impact would be counterproductive.

National and international significance

In 2008, the SA Parklands became a National Heritage Site in 2005. At the moment there is a bid for the Parklands to become a World Heritage Site. The proposed amendment to the code has the

potential of undermining this bid. There is enormous benefit to the city if this bid were successful. It would bring people to Adelaide as a special and unique destination which is different and more creative in thinking and planning from other cities in Australia.

Summary

The City South Association is opposed to the amendment of the code for the Riverbank precinct as this proposal:

- Further decreases parkland space for use by people who live in the city and those who visit.
- Over-rides the important role of the Parkland Authority and the City Council in preserving the parklands and conflicts with the objects of the Parklands Act.
- Conflicts with the current agreed and published plan for the parklands as required by the Parklands Act.
- Negatively impacts the health and well-being of South Australian.
- Has a possible negative impact on business in the south west of the city, shifting customers to the north of the city.
- Destroys significantly important historic and cultural sites.
- Undermines the bid for the parklands to become world heritage site.

We ask that the issues we have identified be considered and responded to. We are particularly concerned about the consultation process as there is a lack of community engagement, transparency and it is being conducted too quickly without the opportunity for public debate.

Briony Hunt

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Briony

Family name: Hunt

Organisation: Australian Dance theatre

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please do not allow the Riverbank to change, be built on. The Karna people, the rightful owners on this land would never allow this and the rest of us don't want it. Stop now. Please. For all our futures

Attachment: No file uploaded

sent to
proponent
email: plansasubmissions@sa.gov.au

Briony Pearce

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Briony

Family name: Pearce

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am opposed to anymore development of our Riverbank Precinct. We do not need to look like Melbourne.

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sent to proponent email: plansasubmissions@sa.gov.au

Bronwyn Bentley

I have read the article in the Advertiser today with GREAT concern. How can this constant threat to the Adelaide Parklands be stopped? If only OUR parklands could be recognised world wide and have some legal protection.

The idea of constructing high-rise apartments, unnecessary entertainment centres, hotels, healthcare facilities etc, etc on the banks of the River Torrens should never happen. I am very worried about the proposal and completely against the rezoning of the City Riverbank Zone (Entertainment Precinct).

Yours sincerely,
Bronwyn Bentley

Bruce Nielsen

River bank concert hall - No thankd

Cam Longshaw

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Cam

Family name: Longhsaw

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: We moved from Sydney to Adelaide because the Parklands are a defining feature of Adelaide that sets it apart from other cities. The state was gifted the Parklands to look after on behalf of the people. Rezoning the Parklands to effectively benefit the Casino precinct is not a forward-looking proposal. The government must think we're really stupid to think that this is the only time they'll nibble into the parklands. Give them a few years and they'll nibble into it again, and then again. It's not a magical resource that keeps growing. It will only ever diminish with no foresight and an imagination the size of a shrivelled pea. As the city grows, the Parklands need to be protected. They're precious.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Carl Purcell

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards,

Carl Purcell

Carlsa J Carter

From: carlsa carter [REDACTED] >
Sent: Wednesday, 27 October 2021 4:59 PM
To: AGD:Plan SA <plansa@sa.gov.au>
Subject: Submission on Riverbank Precinct Code Amendment Plan

Dear Sir/Madam

I wish to express my complete opposition to the proposed Riverbank Precinct Code Amendment. I believe that most of the developments over the past two decades that encroach on the open space along the Torrens River have detracted from the beauty and spaciousness of the city. The most beautiful cities in the world are characterized by broad vistas, boulevards, parklands, preservation of beautiful historic architecture, homogeneity of significant precincts and recognizing the importance of lines of vision and curtilage.

The lines of sight through and over Parliament house and Old Parliament House, the gracious Railway Station and beside, along and past the Festival Centre have been destroyed by the Casino and Festival Plaza plan. The views to the northern parklands along Morphett St and the Bridge have been destroyed by allowing mediocre architecture - the Exhibition Centre and SA MOD building to crowd in on each side. This seems incredibly short-sighted and will make it impossible to widen the bridge in future.

Similarly I regard this proposal as hasty, threatening cultural heritage (the Old Gaol) and driven by the same powerful commercial and vested interests rewarded by the new Planning Act.

I am dismayed by the current government's back-flip on its electoral opposition to the Bill, its sidelining of local government and the community and consequently the dozens of unsightly towering apartment blocks under construction in the inner suburbs.

Thank you for this opportunity to comment.

Carlsa J. Carter

[REDACTED]
BRIDGEWATER SA 5155

Carol Bailey

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Carol

Family name: Bailey

Organisation: Community Alliance SA

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Adelaide does not need an entertainment/economic zone in the Adelaide Parklands along the Torrens River Bank precinct. Unlike other Australian capital cities, we are very short on parklands and parks in South Australia and Adelaide in particular. We have ONLY the parklands due to the vision of Colonel William Light and early decision makers. To continue to add more buildings, theatres, schools, entertainment zones and markets in the Adelaide Parklands is to destroy the only green belt we have. Please do not do this! Sydney and Melbourne are well blessed with large parks, Adelaide has only our parklands. Please protect them.

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sent to
proponent email: plansasubmissions@sa.gov.au

Carol Faulkner

Please find attached my submission regarding the Riverbank Precinct Code Amendment.

It would be most appreciated if you could acknowledge receipt of the attached letter, thank you.

Regards,

Carol Faulkner

[REDACTED]

To:

Hon Vicki Chapman MP, Minister for Planning and Local Government

c/-

Code Amendment Team

Planning and Land Use Services Division

Attorney-General's Department

via email: plansasubmissions@sa.gov.au

27 October 2021

Dear Ms Chapman,

Re: Riverbank Precinct Code Amendment

I provide the following reasons why you should not approve the Riverbank Precinct Code Amendment in its current format.

1. The traditional landowners, the Kurna people, have not been adequately consulted.

By your own admission published in The Advertiser ("*Chapman: I'll keep sacred sites safe*", 26/10/21), you have yet to meet with Kurna elders to discuss culturally significant sites that will be impacted by the Code Amendment. In the words of Kurna elder Jeffrey Newchurch, the River Torrens and the Adelaide Park Lands are vitally significant to the Kurna people "not only in a cultural sense, but also in a mental sense, spiritual sense, and wellbeing sense". Their spiritual

connection to the land spans 40,000 years. No decision on the Code Amendment can be made without reaching agreement with the Kurna traditional owners that all their concerns and needs will be met.

2. The Code Amendment is contrary to the Adelaide Park Lands Act 2005.

The Adelaide Park Lands Act 2005 explicitly precludes development of the nature proposed in the Riverbank Code Amendment, beginning with the Act’s description:

“An Act to establish a legislative framework that promotes the special status, attributes and character of the Adelaide Park Lands; to provide for the protection of those park lands and for their management as a world-class asset to be preserved as an urban park for the benefit of present and future generations; and for other purposes.”

Protection of the park lands as an urban park cannot be reconciled with the Code Amendment’s intention to allow the following land uses as detailed on pages 49-50 of the Draft Code Amendment:

Deemed to Satisfy Criteria / Designated Performance Feature	
nd Use and Intensity	Riverbank Code Amendment Draft For Consultation
Development comprises one or more of the following:	
(a) Advertisement	
(b) <u>Arena</u>	
(b)(c) Community centre	
(e)(d) Consulting room	
(d)(e) Office	
(e)(f) Convention centre	
(f)(g) Educational establishment	
(g)(h) Entertainment venue	
(h)(i) Helicopter landing facility	
(i)(j) Hospital	
(j)(k) Hotel	
(k)(l) Licensed premises in association with hotel, restaurant, shop or the like	
(l)(m) Land division	
(m)(n) Light industry (including high technology and research based activity)	
(n)(o) Pre-school	
(o)(p) Shop	
(p)(q) Serviced apartments	
(q)(r) Tourist accommodation.	
DTS/DPF 1.2	
A change of use	

Page 49

Page 50

At a stretch, the South Australian community might be willing to accept development on the park lands that achieves tangible social outcomes associated with health and education. What goes a bridge too far is commercial developments that purely line the pockets of developers and big business. [And yes, the Intercontinental Hotel and the Casino extension are existing examples – I don't know how they were approved – but that's no excuse to allow more of the same.]

The inclusion of "Helicopter landing facility" in the list of proposed development types is particularly galling given the public backlash and defeat of the 2014 proposal by Helistar Aviation to put a helipad on the banks of the Torrens west of the Morphett Street Bridge. South Australians do not have short memories. Any revival of such a proposal will evoke the same backlash and defeat. "Helicopter landing facility" should be the first thing deleted from the current version of the Riverbank Precinct Code Amendment.

The Adelaide Parklands Act 2005 proscribes seven Statutory Principles, none of which support commercial development:

4—Statutory principles

(1) The following principles are relevant to the operation of this Act:

(a) the land comprising the Adelaide Park Lands should, as far as is reasonably appropriate, correspond to the general intentions of Colonel William Light in establishing the first Plan of Adelaide in 1837;

(b) the Adelaide Park Lands should be held for the public benefit of the people of South Australia, and should be generally available to them for their use and enjoyment (recognising that certain uses of the Park Lands may restrict or prevent access to particular parts of the Park Lands);

(c) the Adelaide Park Lands reflect and support a diverse range of environmental, cultural, recreational and social values and activities that should be protected and enhanced;

(d) the Adelaide Park Lands provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City in a manner that should be recognised and enhanced;

(e) the contribution that the Adelaide Park Lands make to the natural heritage of the Adelaide Plains should be recognised, and consideration given to the extent to which initiatives involving the Park Lands can improve the biodiversity and sustainability of the Adelaide Plains;

(f) the State Government, State agencies and authorities, and the Adelaide City Council, should actively seek to co-operate and collaborate with each other in order to protect and enhance the Adelaide Park Lands;

(g) the interests of the South Australian community in ensuring the preservation of the Adelaide Park Lands are to be recognised, and activities that may affect the Park Lands should be consistent with maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

Principle 4(g) in particular leaves no room for privately-owned commercial developments like helicopter landing facilities, hotels, serviced apartments and tourist accommodation.

3. The Code Amendment is contrary to the Adelaide Park Lands National Heritage Listing.

The Adelaide Park Lands and City Layout were granted National Heritage Listing on 7 November 2008. The following extracts are taken from the Australian Heritage Database: [Australian Heritage Database \(environment.gov.au\)](http://australianheritage.gov.au)

The Adelaide Park Lands and City Layout is a significant example of early colonial planning which has retained key elements of its historical layout for over one hundred and seventy years.

The Plan endures today in the form of the Adelaide Park Lands and City Layout. The key elements of the Plan remain substantially intact, including the layout of the two major city areas, separated by the meandering Torrens River, the encircling Park Lands, the six town squares, the gardens and the grid pattern of major and minor roads.

The Park Lands, in particular, are significant for the longevity of protection and conservation and have high social value to South Australians who regard them as fundamental to the character and ambience of the city of Adelaide.

The national significance of the Adelaide Park Lands and City Layout lies in its design excellence. The Adelaide Plan is regarded as a masterwork of urban design, a grand example of colonial urban planning. The city grid and defining park lands were laid over the shallow river valley with its gentle undulations, described by Light as the Adelaide Plains.

The emphasis on public health, amenity and aesthetic qualities through civic design and provision of public spaces were to have an influence on the Garden City Movement, one of the most significant urban planning initiatives of the twentieth century.

[Emphasis mine]

The types of development proposed in the current version of the Riverbank Precinct Code Amendment would seriously impact the characteristics of the Adelaide Parklands that merited National Heritage Listing. Commercial high-rise development has no place in Park Lands that “are significant for the longevity of protection and conservation and have high social value to South Australians who regard them as fundamental to the character and ambience of the City of Adelaide”.

4. The Code Amendment is detrimental to Adelaide’s bid for National Park City status.

The types of commercial development proposed in the Code Amendment would jeopardise Green Adelaide’s bid for Adelaide to become the second National Park City in the world. Green Adelaide’s objective in achieving National Park City status is to “create a city that is rich with nature, and a place where people take action to be better connected with the environment and each other”.

The effect of the proposed Code Amendment would be a substantial reduction in the natural surroundings of the Torrens through destruction of trees, green open space and biodiversity habitat which would be contrary to our bid for National Park City status.

5. The Code Amendment is contrary to State Planning Policy regarding Climate Change

The Riverbank Precinct Code Amendment does not demonstrate adherence to SPP 5: Climate Change.

SPP 5: *Provide for development that is climate ready so that our economy, community and environment will be resilient to climate change impacts.*

SPP 5 requires development that makes our environment resilient to climate change. The proposed Code Amendment would rezone or subzone 71 hectares of the Park Lands, much of it destined to be

built on, meaning a substantial loss of trees, green open space and biodiversity habitat, hence having a negative impact on our environment's resilience to climate change. So in fact, the proposed Code Amendment is in direct contrast to SPP 5: Climate Change.

6. The Code Amendment is contrary to State Planning Policy regarding trees.

The Riverbank Precinct Code Amendment does not demonstrate adherence to Regional Plan Policy 49.

Regional Plan Policy 49: *encourage more trees (including productive trees) and water sensitive urban landscaping in the private and public realm, reinforcing neighbourhood character and creating cooler, shady and walkable neighbourhoods and access to nature.*

The proposed Code Amendment will do exactly the opposite by requiring the destruction of hundreds of mature trees.

I regularly travel to the city on the Outer Harbor train. When I first heard about the Marshall Government's proposed new city stadium, I made a point on my next train ride to look at the area where the stadium would be built. Sadly, I realised that literally hundreds of trees would need to be felled. Even if each felled tree is replaced by planting a new tree, that has no effect with regards to our resilience to climate change until those new trees reach maturity in twenty or thirty years time.

In my view that is wanton environmental destruction and hypocrisy on a grand scale considering the State Government is always banging on about increasing Adelaide's tree canopy cover. A new stadium is not essential infrastructure and does not justify the extreme negative impact on our environment and on our resilience to climate change.

7. The Code Amendment is contrary to State Planning Policy regarding biodiversity.

The Code Amendment does not demonstrate adherence to Regional Plan Policy 92 and Performance Outcome PO 3.5 with regards to biodiversity.

Regional Plan Policy 92: *support the enhancement of urban biodiversity of metropolitan Adelaide through the development of greenways in transit corridors, along major watercourses, linear parks and the coast and in other strategic locations.*

Performance Outcome 3.5: *Development sensitive to native biodiversity which incorporates ways to protect and improve biodiversity through its design and siting.*

Adelaide City Council has published a biodiversity report detailing the negative impacts on wildlife that would arise from implementation of the proposed Riverbank Code Amendment. The habitat of the Eastern Water Skink, deemed of "conservation concern" would be compromised as it lives on water edges in "Tulya Wardli" where the proposed new health and entertainment sub-zones are proposed. Butterfly species, including the flame sedge skipper, the broad-margined and satin azure, and the two-spotted line-blue would also be at risk as they rely on fringing vegetation along Karrawirra Parri River Torrens. Putting these species at risk is in direct contrast to the requirement of Regional Plan Policy 92 to "support the enhancement of urban biodiversity of metropolitan Adelaide through the development of greenways in transit corridors, along major watercourse, linear parks and the coast and in other strategic locations".

8. The Minister has not adequately valued the land subject to the Code Amendment.

University of Adelaide Associate Professor Patrick O'Connor claims that you, Minister Chapman, have not adequately valued the land that is subject to the Code Amendment. Professor O'Connor asserts:

"We don't have a fair contest between what we might predict to be a cost-benefit for building a hotel, or building a recreation centre, or building a sports stadium, compared to the utility that we have now and over time for keeping the space flexible, open, intact, with ecological integrity. It's an imbalance in the way we look at things economically that often says doing things that create bricks-and-mortar results in higher values, but it's not necessarily the case. Rather than looking at the land solely through a monetary lens, the "walks and strips" should be assessed according to the wellbeing, recreation, fitness and aesthetic returns they provide. All of those things have real values." – CityMag article (published in Indaily): *There's a lot at stake in the State Government's Park Lands Grab*, 20 Oct 2021.

I urge you to re-think the proposed Code Amendment in terms of its negative effect on the value of wellbeing, recreation, fitness and aesthetic returns to the people of South Australia.

9. Public consultation for the Code Amendment was not sufficiently advertised.

When I made my multiple submissions during consultation for the introduction of South Australia's new planning system, it did not occur to me to check if there would be any changes to the way Planning Code Amendments (formerly Development Plan Amendments) were required to be advertised.

The old Development Act required that DPAs had to be advertised in the public notices of both *The Advertiser* and the former local *Messenger*. Through a phone call to PlanSA I discovered this is no longer the case.

I submit this is a significant impediment to informing the general public about their opportunity to make submissions on important planning issues. While it's true a lot of older South Australians tend to read *The Advertiser* and would be more inclined, having the time and inclination, to make a submission than younger people who are too busy, but consequently, by not advertising public consultation of Planning Code Amendments in print news, a significant proportion of the South Australian public will miss the opportunity to have their say on important planning matters.

Even in regards to on-line submissions via the Have Your Say website, how are members of the public of any age going to know that a new issue has been released for public consultation? I subscribed to Have Your Say with a sign-in and password in August, yet I didn't get an email or any notification that the Riverbank Code Amendment was on public consultation; I only saw it in the media (I can't remember if it was TV, print or online). It is unrealistic to expect the public to just randomly check the Have Your Say site from time to time to see if there's anything they want to comment on. There has to be a better way to get the information out to as many people as possible.

Caroline Chapman

Please find attached personal submission

supporting

1. zoning for new WnC Hospital but not car park/transit in Kate Cocks Park
not supporting

1. extension of City Riverbank Zone and Health subzone in to Kate Cocks Park or further west.
2. any Arena or additional large building in any extension of the Entertainment subzone just west of Montefiore Road
3. extension of Innovation Subzone north to include Botanic High
4. expansion of Riverbank Subzone of Parklands Zone to the northern bank of the river, or any further types of development on the northern bank.

Regards

[REDACTED]

[REDACTED]

Submission – Riverbank Precinct Code Amendment

C Chapman 27 October 2021

Importance of green open space in cities

Recognition globally of the importance of open green space for both connection with nature, and contributing strongly to creating liveability in our cities. Other Australian cities are retrofitting their green open space to cater for post pandemic, expanding populations and future climate resilience factors, and, recognising the health, wellbeing, and environmental benefits. Sydney is busy rejuvenating its CBD by reclaiming space from buildings to create public spaces, green avenues and slow streets and laneways and prioritise walking, bike riding and public transport in these areas. Commercial buildings are being replaced to create plazas and public open space. Melbourne is also focussing strongly on its open green space.

Adelaide Park Lands are a gift from the past that is valued by the community and will become even more valuable in the future. Adelaide City is radially connected with most of its suburbs by public transport and is well placed to continue to provide socially and economically accessible parklands and open space and places where people can meet and recreate both informally and at events and festivals. This does not require large buildings which can be built on brownfields sites in other locations.

The Adelaide parklands should, in my opinion, be retained with limited additional small scale built form and maximum openness and flexibility for public uses rather than being taken over for public enterprise. The parklands are not the place for hotels, and commercial enterprises. The green spaces are the lungs and air conditioners of our future cities, and provide resources for the resilience of future generations.

It is timely to both retain and strengthen a lasting legacy of Light's Park Lands Vision AND to retain recognisable links with heritage of the local Traditional Owners. The Park Lands are a community resource to be enjoyed freely by current and future citizens and visitors and not be further alienated by large buildings and commercial enterprise.

Despite being a jewel of liveability in our Adelaide Crown, the Park Lands continue to be at risk of further consumption by large buildings, as short term casualties to attract and secure development that will uplift the city but at the long term expense of the value and benefits of the Parklands to the community and future generations. Hence it is suggested that development be confined within the existing zones on the southern side of the river and no further large commercial buildings be permitted.

The attempt to turn more of the Adelaide Parklands in to more Mixed Use area rather than maintaining and returning as much as practical to passive recreation green space is not acceptable and especially so where such mixed use is for large scale commercial purposes rather than predominantly for public benefit (all public) at a people scale.

Summary of comments re Zones

City riverbank Zone

Do not support addition of Arena in this Zone. There are already enough private/commercial arenas of various flavours in that localised precinct - Oval, Tennis centre, Convention Centre, Theatre, that add to the public arenas Parliament House, Elder Park, university halls and gathering places ...

Health Subzone

Accept a new Women's and Children's Hospital site within the current zoning, subject to an independent review of the proposed size of the hospital being realistic for future needs - if it is likely to be short of key services space (ala RAH) then another site south of North Terrace in the city should be found and linked underground to the RAH. This may be costly but so is loss of parklands area particularly if it is for suboptimal outcomes for health.

Do not support the expansion of built form for a transit hub/car park in Kate Cocks Park. An alternate location and/or solution for its transit hub/car park should be found.

Do not support changing the zoning from Adelaide Parklands Zone to the west of the rail line.

Entertainment Subzone

Do not support the proposal to rezone this land to support an Arena and consider that Park Lands area should not be lost to this scale of built form (irrespective of how it has been used in the past) - it is an opportunity to return that land to usable public open space use not commercial entertainment /built form use.

An arena also provides the potential for significant concurrent people and traffic in this proposed subzone area and raises the potential to reduce access to emergency services in the medical precinct.

Would support extension of Entertainment Subzone west of Morphett St Bridge and Montefiore Road if the uses did not include large scale building and instead included low scale buildings in a predominantly open space setting for recreation including on water activities.

Innovation Subzone

Do not support the proposal to rezone the land further north of the existing Innovation Subzone- it is hard to see how this land is required to support the existing High School. The land is an important open space link, which has only be resumed from encroachment by other built form in the last decade or two. It forms significantly improved open space connectivity through and between the university campus, the river, and the Botanic Gardens and North Tce.

Adelaide Park Lands Zone - Riverbank Subzone

Do not support this rezoning as presented, as the area can already be activated through the existing Adelaide Park Lands Zone principles and already hosts many events annually. Partial coverage on the southern bank to activate with small scale amenities and on-water activities is acceptable.

The area is particularly important to Colonel Light's original plan, with reference to views from North Terrace down the banks to the River Torrens. The land is highly significant to Kaurana and this should be respected and left free from additional built form.

The Riverbank subzone uses are not necessary on the northern bank of the River as there is already the Adelaide Oval and hotel and Tennis Centre and associated uses on the northern side of War Memorial Drive, and has been suggestions of redeveloping those facilities too. Such development should not cross over the road toward the river.

Changes to the proposed Policies

Mapping- suggested changes to spatial areas proposed

General

I assume an error on page 23 stating Innovation Precinct 'extends up to the Adelaide Zoo' as all other references to the extension of that Subzone only go north to the school.

I note instead the policy change in the Adelaide parklands Zone to accommodate extra uses in the Zoo.

Zone

Delete proposed extension of Zone north along Frome Road to include the Botanic High School.

Delete the proposed extension of the Riverbank Zone west of the rail lines in to the Gaol and Barracks area for car park and transit hub.

Extend Zone west of Montefiore Road and in to the river **only if the uses are NOT for large scale building** (including Arena). Retain small scale open space and on water uses.

Subzones

Delete proposed extension of Entertainment Subzone west of Montefiore Road unless Arena and large scale built form is excluded.

Reduce size of proposed Riverbank Subzone to only apply to south bank and not extend to within 15m of the northern bank to preclude on river and on bank development on the northern bank.

Delete proposed extension of Innovation Subzone to north to Botanic High. Retain the full width open space linkage between university and Botanic Park.

Code Policy- suggested changes to policies proposed

Pg 49 City Riverbank Zone

DTS/DPF1.1 delete proposed (b) Arena

Pg 57 Cultural Institutions SubZone

DTS/DPF 1.2 [this appears to allow shops and licensed premises etc on land near the school at the north end of the Innovation Subzone]

Pg 59 Entertainment Subzone

PO 2.6 Better define what 'active and appealing edge' means.

P 67 Innovation Subzone

PO 4.4 Important to ensure the open vista linkage is retained - No immediately obvious reason why this is added to the Innovation Subzone in the first place unless the intent is to reduce the width of the space... strengthen the policy if retained in this subzone to retain the existing width link.

Pg 73 Adelaide Parklands Zone

Revert the proposed changes to PO 1.7 except the proposed change re the Zoo.

Caroline Johnson

To Whome it may concern:

I object in the strongest terms to more incremental urbanization of the parklands.

In this case it is the Helen mayo park.

We do not need another stadium or any other ugliness or hard surfaces on our parklands.

Caroline Johnson

Town Planner /Artist

MCRP, Assoc Degree Vis Art

Caroline Smith

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Caroline

Family name: Smith

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: This land is precious. The need for open green spaces has only been further emphasised during the COVID 19 lockdown in other states. Such city landscapes are valued and are important to our health and wellbeing. Green spaces are needed to protect against the urban heat generation from the development as planned in this proposal. The City should be protecting our green spaces, and reducing carbon footprints. We need to protect this for future generations.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Carolyn Markey

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Carolyn Markey



Carrol Roberts (Stansbury Museum)

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Community Group

Given name: Carrol

Family name: Roberts

Organisation: Stansbury Museum

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: We as a community group strongly oppose the use any of the Adelaide Park lands for any permanent commercial development. The idea of considering any National Heritage Listed park lands that has been set aside as a permanent green belt around our beautiful state city is incomprehensible. With the world wide concern of global climate change how would we benefit from buildings and commerce on park lands? Colonel Light planned our city to be surrounded by a belt of park lands that are FREE and accessible to ALL PEOPLE.

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sent to proponent email: plansasubmissions@sa.gov.au

Cate Rounsefell

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Cate

Family name: Rounsefell

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am against any changes to Riverbank Precinct zoning that allows construction of permanent buildings on existing parklands. The natural heritage of our existing riverbank and surrounds are precious assets for our city.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Catherine

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kind regards

Catherine

Catherine McMahon

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Catherine

Family name: McMahon

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am not at all happy about the river precinct and parklands being rezoned for entertainment, sport or parking. Please leave it for the people of Adelaide and afar to enjoy as is. There is already an entertainment centre at Hindmarsh that has a huge capacity and good public access, and there is no need for another. If anything, rezone the Parade Ground and build a much needed Concert Hall for the UNESCO city of music! Pop up events along the river are fun for short periods. Thank you for this opportunity.

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sent to
proponent email: plansasubmissions@sa.gov.au

Cathi Tucker

My family and I reject the planned re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes they will lose their character as Parks.

Re-zoning for the proposed purposes of entertainment, innovation, health etc., would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. They are unique.

I value living in a state where city green space is seen as a vital part of the character of the place, along with heritage. This is our point of difference.

Hands off.

Cathi Tucker

[REDACTED]
[REDACTED]
[REDACTED]

Chantal Wiles

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: chantal

Family name: wiles

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: If your proposal includes OUR Old Adelaide Gaol then you can expect a massive backlash from the public! This is NOT yours to destroy. It is OUR history, there is no other building like the Gaol. It is one of our oldest Adelaide buildings still standing with rich history and in fantastic condition PLUS it is a burial ground of people who are part of our ancestors. This also includes Indigenous people. Are you considering destroying and building on burial grounds? Absolutely disgusting! I am 100% against the destruction of Old Adelaide Gaol and the grounds around it!!! You have lost a vote even considering this!

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sent to
proponent email: plansasubmissions@sa.gov.au

Charles Gilchrist

To whom it may concern,

I am concerned about the proposal to re-zone the Adelaide Park Lands.

If Parks are re-zoned for other purposes, then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kind regards,
Charles Gilchrist

Charlotte Hutchesson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Charlotte

Family name: Hutchesson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

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sent to proponent email: plansasubmissions@sa.gov.au

Dear Sir/Madam,

I would like to voice my opposition to the Riverbank Precinct Code Amendment. I am opposed to areas of the parkland being rezoned, and completely against any commercial development on our parklands.

This open space is a precious resource that belongs to everyone, and can never be replaced

once it is gone. With the density of our city increasing, it is more important than ever to keep

this large area of parklands for the use of all people. That people living in the middle of a city

can easily find solitude and be around nature and wildlife is one of the best things about our

city. The parklands can be used regardless of age or socio-economic position in life. They should not be sold off to the highest bidder.

My submission does not cover issues of environmental destruction and disrespect to our indigenous people, of which I have no expertise on, but these are equally if not more important issues with the proposed amendment.

I have a hard trying to find the words to describe how disgusted I feel about this proposed

amendment, and I would like to add my voice to the thousands of others who share my views.

Yours sincerely,

Charlotte Hutchesson
Stepney
SA 5069

Charlotte Hy

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. We don't need more precincts in Adelaide. Fix and beautify the existing one. The mall is one of the ugliest, most off-putting place in Adelaide. The eastern Part of Hindley street is dirty, dull, in bad taste, etc..... Fix these, do not create more heartless ugly development (eg around the festival center. Burk, it is grey, dead, so not welcoming).

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

I agree with Rex Jory who says ' Turning over areas of open space in the parklands to private developers is reckless and irresponsible, and politically, morally and historically wrong. It verges on urban vandalism. '

Stop the vandalism. Start restoring (without bitumen).

Charlotte Hy

Wayville

Charlotte Newsome

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Charlotte

Family name: Newsome

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: In general I am not supportive of the State Government taking control of the Park Lands and building on them. Particularly for an arena that no one in SA wants or needs. The lack of Kaurna involvement is extremely concerning. They are the owners of this land and their perspective needs to be prioritised above all else. Please leave the Park Lands alone and recognise that the community enjoys them as they are, and real progress would be recognising the importance of them to all people in their current form.

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sent to proponent email: plansasubmissions@sa.gov.au

Chris Carrand

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Chris

Family name: Garrand

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The Liberal Government are a cackle of cowards who seek to privatize the whole public sector, until the entire government is run for profit like a business. The parklands are not prime real estate to be sold off you dimwitted donkeys. You know where else would be a great place to put hotels; central park. But if you do that it stops being New York. Likewise if you build on the Torrens it will cease to be Adelaide and be more like Sydney or Melbourne, we will stop being the most livable city in the world. This project is ill-planned, short-sighted and obviously outside of the public interests.

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sent to
proponent email: plansasubmissions@sa.gov.au

Chris Harris

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Chris

Family name: Harris

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: Adelaide is unique as a city enclosed in a figure of eight of parklands. The parklands should be kept intact for future generations. There should not be developments on the parklands. This includes stadia, car park buildings, further health buildings, schools, shops (on or off the water), tourist accommodation, private residences. There should be no subdivision of the parklands

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sent to proponent email: plansasubmissions@sa.gov.au

Chris Lloyd

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Chris Ramsden

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Chris

Family name: Ramsden

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am opposed to any development of the Riverbank and Parklands precinct. It is public space for the enjoyment of people at all and any time. The development will preclude the public from enjoying the amenity of free and open space, the development of which, will lock away and reduce public space. The proposed development will further reduce the amenity of the precinct by the construction of buildings and infrastructure that will in effect be available to some but not all members of the public. Visually it will be an additional barrier between the public and the Parklands, further severing the visual linkage between the City and the Parklands. Any loss of this public space is a loss to all members of the public, the environment and the heritage of open space that is gifted to all members of the public. The development will only add to the loss of public space as already encroached on the precinct and Parklands, by hospitals, sporting clubs, the oval, a hotel, the convention centre, high school, as some examples of many encroachments that are forever locked away by private and other interests.

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sent to proponent email: plansasubmissions@sa.gov.au

Chris Taras

I object to the re-zoning of any part of the Adelaide Park Lands.

Many sections of the Park Lands have historically been eroded and utilised for development subsequently compromising the extent of public open space and the potential to increase tree canopy cover and this amendment continues the road towards Park Lands neglect and destruction. The so called 'vacant sites' rezoned for the purpose of entertainment, health, education etc and turned into multistorey carparking or arenas, just to name two proposals, is ignoring Government obligation to manage public open space for the future benefits of our whole community. Once development occurs it will be lost and not returned to public open space.

Development opportunities are required for our city however in other locations, not within the Adelaide Park Lands precinct. Typically, this amendment will take land but give very little in return to increase public open space towards our priceless Park Lands precinct.

Also in the Riverbank Precinct Code Amendment, insufficient information has been provided in relation to the detail, discussion and protection of culturally significant sites for the Karna community.

Regards

Chris Taras

██████████

██████████████████

██████████████████████████████

Chris Thompson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Chris

Family name: Thompson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I strongly urge that this proposal be stopped. Our parklands are the cornerstone of an open and healthy environment and must not be further eroded.

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Attachment 5: No file uploaded

sent to proponent email: plansasubmissions@sa.gov.au

Chris Vounasis

On behalf of The University of Adelaide please find attached submission in regard to the Riverbank Precinct Code Amendment.

Kind Regards

CHRIS VOUNASIS

Managing Director



E. chris@futureurban.com.au

W. www.futureurban.com.au

A. Level 1, 74 Pirie Street, Adelaide, SA, 5000

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October 26, 2021

Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
ADELAIDE SA 5001

Dear Code Amendment Team,

SUBMISSION – RIVERBANK PRECINCT CODE AMENDMENT

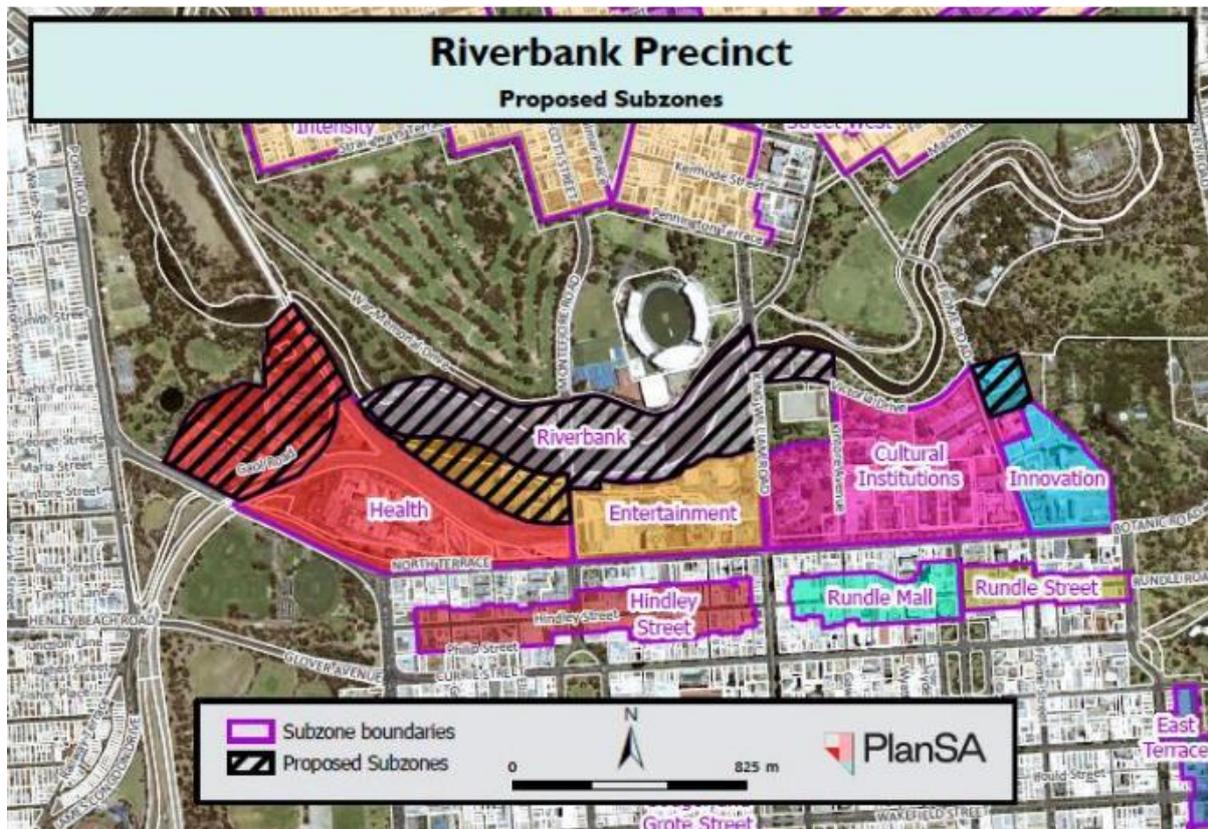
We act for The University of Adelaide (“The University”).

The University is a key stakeholder in the City Riverbank Zone and more specifically, in the Cultural Institutions Subzone.

The University owns a property containing the Helen Mayo North and South Buildings (“the Helen Mayo Site”) located on the eastern side of Frome Road adjoining both Lot Fourteen and the Adelaide Botanic

High School. As a result of the Riverbank Precinct Code Amendment, this property will be the only property which sits outside of the Innovation Subzone, as identified in Figure 1.

Figure 1 Helen Mayo North and South



Cultural Institutions Subzone

The Helen Mayo Site is located in the Cultural Institutions Subzone where a diverse range of cultural and institutional uses, including tertiary education and associated student accommodation, research, library, viceregal, museums and galleries are envisaged. The types of development that are not envisaged include:

- • Convention centre;
- • Entertainment venue;
- • Helicopter landing facility;
- • Hospital;
- • Motel;
- • Serviced apartments; and
- • Tourist accommodation.

With respect to building height, there is a desire to transition down to the Adelaide Park Lands from the height of existing buildings established along North Terrace. Buildings located along road, and Adelaide Park Lands, frontages should not exceed 3 building levels and 11.5m in height. Buildings located away from road, and Adelaide Park Lands, frontages should not exceed 6 building levels and 22m in height.

There is no current policy within the Cultural Institutions Subzone providing the opportunity for development to exceed 6 building levels and 22m in height.

Innovation Subzone

The Innovation Subzone is proposed to be expanded to consume the recently constructed Adelaide Botanic High School. Within the Innovation Subzone, development of innovative commercial, cultural

(including museum and art gallery), educational and research activities are envisaged, supported by a mix of compatible employment generating land uses.

With respect to building height, buildings should be of a height and scale that minimise impacts on the Adelaide Botanic Garden and Adelaide Park Lands, as well as referencing the scale of buildings facing North Terrace and Frome Road. Specifically, buildings should not exceed 15 buildings levels and 53m in height in the Innovation Subzone (except within the confines of the Innovation Centre which is located in a central location within Lot 14).

The only opportunity for development to exceed 15 building levels and 53m in height in the Innovation Subzone exists in the Innovation Centre subject to satisfying a number of design-related criteria. Clearly, there is an opportunity for greater development potential (with respect to building height) in the Innovation Subzone when compared to the Cultural Institutions Subzone. Apart from student accommodation (which is not contemplated on the Helen Mayo Site), the two subzones generally align in their aspirations to encourage innovation and educational activities.

Helen Mayo North and South Buildings

The Helen Mayo North and South Buildings have been significantly redeveloped and refurbished over the last 3 years. In addition to upgrades to amenities and services, the refurbishment involved:

- the relocation of the Health and Medical Sciences Faculty Office from Barr Smith South to the Helen Mayo North Building;
- the creation of the Immersion Room (specialist virtual reality and audio visual facility for teaching and simulation purposes allowing students to learn by participating in realistic medical scenarios);
- the creation of the adjacent Simulation Facility which recreates hospital suites with cutting-edge technology and life-like manikins that enable students to practise clinical scenarios; and
- the consolidation of three museums into the Vernon-Roberts Museum on the ground floor of the Helen Mayo South Building which houses South Australia's most extensive collection of human disease examples and detailed anatomical prosections;
- the creation of state of the art laboratories for research and teaching; and
- the development of specialist teaching facilities to accommodate the University's Allied Health program.

Clearly, the Helen Mayo Site provides an education focus through innovative activities and functions.

The Riverbank Precinct Code Amendment

The Code Amendment builds on previous Development Plan Amendment (DPA) policy refinements which were completed before the new Code was introduced in March, 2021, including the Lot Fourteen (old Royal Adelaide Hospital) Innovation Area Amendment (approved in April, 2020) which implemented key policy changes to guide the future redevelopment of the former Royal Adelaide Hospital Site as an innovative business, education and research precinct that also incorporates tourist accommodation and limited retail facilities. The policy changes also placed emphasis on cultural facilities and the retention and adaptation of State Heritage Places on the site.

The Lot Fourteen Master Plan (Renewal SA on behalf of the State Government) recently updated in 2019, is also relevant. The purpose of the Master Plan was to determine the key development directions for the site including facilitating the development of the site into an exemplar innovation precinct, supporting business entrepreneurship, education, science, technology and creative industries, together with a focus on the public realm including tourism, hospitality and cultural land uses.

The Code Amendment reinforces the outcomes of the Master Plan by seeking to incorporate the Adelaide Botanic High School into the Lot Fourteen Precinct by applying the same zoning and development principles.

The Helen Mayo North and South buildings serve an educational purpose like the Adelaide Botanic High School. Further, these buildings also use innovative technologies to enhance student learning. The function and/or character of these buildings is entirely consistent with those which currently occur, or which will be absorbed within the Innovation Subzone.

The Helen Mayo site is the only site located on the eastern side of Frome Road within the Riverbank Zone that is excluded from the proposed Innovation Precinct. This does not represent orderly development when there is a strategic opportunity to include the innovative education function within the Innovation Subzone where there is *“a focus on innovation, entrepreneurship, research, education, culture, and tourism - to grow jobs and the South Australian economy”*.

The integration of the Helen Mayo Site within the Innovation Subzone will only strengthen the potential opportunities for a vibrant and engaging environment and better diversify, expand and connect new development with the Universities on the western side of Frome Road. Such is entirely consistent with two of the three key objectives for the Precinct, namely:

- Create a focal point of the east end with a focus on innovation, education, research and tourism;
- Recognise the role of Adelaide Botanic High School in contributing to education in the precinct.

Recommendation

Having undertaken our review, there is no sound planning reason to exclude the Helen Mayo Site from the Innovation Subzone when all other land on the eastern side of Frome Road (i.e. the Adelaide Botanic High School) will be transferred across.

The existing activities that occur on the Helen Mayo Site are likely to continue and evolve representing strong alignment with the existing and future activities of Lot Fourteen. For this purpose, the inclusion of the Helen Mayo Site within the Innovation Subzone will not prejudice the continuation and/or expansion of Helen Mayo should this subzone apply to a future redevelopment.

The integration of the Helen Mayo Site within the Innovation Subzone will provide further innovation, education and collaboration opportunities between the University, Lot Fourteen and the Adelaide Botanic High School which is entirely consistent with the relevant objectives for the Precinct.

Finally, the Innovation Subzone has greater development potential, particularly in regard to building height should the Helen Mayo Site be redeveloped in the future.

Accordingly, we trust our recommendation to include the Helen Mayo site within the Innovation Subzone will be favourably considered.

Yours sincerely,

Chris Vounasis Managing Director

Chris Wellington

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: kim

Family name: becker

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: This is one of the most beautiful and central spots in the city please please please do not do this

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sent to proponent email: plansasubmissions@sa.gov.au

Chris Wiley

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Chris

Family name: Wiley

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I strongly oppose the amendment to re-zone public parkland space for private commercial use. This will set a dangerous precedent that will allow the State Government sell off public land and destroy the image of Adelaide being an environmentally responsible city. This is a hypocritical attitude, considering the State Government is pushing for Adelaide to be recognised as the only city in the world to be surrounded by parklands - and yet they want to turn our parks into privately owned commercial and light industrial areas. There has been no consideration for the fact that some of the proposed areas have cultural and spiritual significance to the Kurna people. It seems that the State Government has forgotten that they are public servants and do not have a mandate to sell off public land as they see fit. This is a key issue that will decide my vote at the next State Election.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Christine Braham

The Adelaide Parklands Precinct should not be re-zoned for any other purpose.

The Parklands should not be seen as empty land to be used for any development that commercial interests put forward. We need to retain the Parklands as open green space. They are the lungs of our city and are a priceless heritage to be retained for the whole of the community to enjoy.

The Parklands area proposed for an Arena is not 'degraded' as quoted by the Premier. Rather, the Linear park in this vicinity is enjoyed by countless people from across the whole of Adelaide where friends and families come for healthy, active recreation.

There are many significant trees in this area providing important habitat for birds and animals. We should be trying to increase our green footprint not reduce it. We should be adding to the number of trees to increase canopy and hence reduce the heat of our city. Trees take years to grow. Cutting down one significant tree to be replaced with spindly so called 'mature' trees is hardly an honest attempt to 'green' our city. This is what so often happens when 're-zoning' allows for more built development.

The area near the proposed Arena also has great significance for the local Kurna people. Prior to the redevelopment of the Adelaide Festival Centre, there was beautiful sculpture in the front of the entrance, to represent the significance of this whole area around the River Torrens to the Kurna people. The sculpture has gone and the trail from there, 'The Adelaide Kurna Walking Trail', around the Torrens, which visits places of Kurna importance, is also now at risk of disappearing all together.* Previously I had taken new arrival students on this trail to introduce them to Indigenous understandings. The proposed development would completely decimate any remaining connections this area has or had with the original people of Adelaide.

Many demands have been and are being made for additional uses and buildings on our Parklands. Over the years the open-space nature of our parklands has been greatly eroded. The presence of surveyors in Bonython Park and the adjacent olive grove and Police Grays paddocks to survey for additional roads and use of the Parklands for the carpark for the new Womens and Childrens Hospital is a further example of how the integrity of the Parklands is not being respected.

We urgently need leaders with vision and foresight who have the courage to make a commitment to retain our green space for the benefit of us all now and for future generations.

* <https://maps.cityofadelaide.com.au/journey/62ff5ae1-b9d0-11ea-96fe-067ec0c7e8f4/adelaide-kurna-walking-trail/default>

Yours Respectfully

Christine Braham

██████████
████████████████████

Christine Francis

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Christine

Family name: Francis

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

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sent to proponent email: plansasubmissions@sa.gov.au

Email: plansasubmissions@sa.gov.au
October 26, 2021

RIVERBANK PRECINCT CODE AMENDMENT SUBMISSION

Adelaide is a renowned Garden City, thanks to the visionary survey executed by Colonel William Light, who (apart from a mere 9 blocks dedicated to government buildings and facilities) intentionally reserved surrounding vacant land for the general community's use and pleasure. In 2005 the Adelaide Park Lands Act recognized our unique parklands locally and in 2008 they had the distinction of being added to the National Heritage List.

The Marshall government's Riverbank Precinct Code Amendment proposal, which now envisages re-zoning 70 hectares of land from Adelaide Park Lands to City Riverbank Zone and then applying 4 subzones to accommodate health, entertainment, education, innovation and commercial purposes, is severely at odds with current planning provisions for this area under

the recently implemented Planning and Design Code. Promulgated new land uses including land division, light industry, accommodation, high rise buildings (up to 20 levels) and encroaching carparks are completely out of sync with existing clearly stated desired outcomes for an 'accessible and well-connected open space system'. A massive development footprint along the riverbank will only serve to limit the promised 'range of active and passive recreational activities with a high level of amenity', including walking/cycling tracks, natural areas, events, gardens, public art et cetera, which should be readily enjoyed by people within this state.

Overall I consider this initiative tone deaf to the will and needs of citizens who are constantly forced into battle to preserve their precious but ever diminishing natural heritage and historical connections. It also ignores the well recognised social, mental and physical health benefits that publicly accessible open green space delivers. Surely the past 18 months have demonstrated the importance of the calming outdoors and breathing fresh air... especially for city dwellers in high density accommodation. Moreover, given widespread community desire to conserve the environment and mitigate climate change, greater attention should be given to biodiversity, sustainability and expanding NOT decreasing the existence of trees and open space to improve people's health and minimise heat island effects.

While fostering new commercial interests as part of a major development mix may indeed help stimulate the economy, this particular venture nonetheless comes across as a greedy land grab of cherished public property and one that is totally insensitive to established nearby businesses struggling to recover from hardships caused by government policy during the pandemic.

There are also cultural imperatives for the Kaurna. The sheer bulk of the proposed Arena stadium compromises the continuity of a narrow treed walking path with its regular Kaurna heritage tour, while the extension of the Frome Park/Nellie Raaminymmerin site raises concerns about disturbing a recorded and protected Aboriginal Burial ground.

Existing legislation and Code provisions, cultural, health and environmental considerations all support a strong case against the acquisition of priceless, irreplaceable open space for such large scale development. In reality the land belongs to the people and should remain intact, respected for its intrinsic value and enjoyed as originally intended.

Respectfully,

Christine Francis
NORWOOD SA 5067

Christine Pyman

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Christine Reid

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Christine

Family name: Reid

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I am against all of the Riverbank proposals. We need to value our beautiful riverbanks and heritage areas as well as the Kauna heritage of all the areas. Adelaide is known as the garden city, keep it that way. We do not need more coffee shops or man made edifices. Keep the greenery, keep the natural environment. We are not Melbourne or Sydney, Adelaide does not need to be rebuilt in their likeness. Please keep Adelaide's identity, and identity that is unique and valued by many Australians and overseas visitors.

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sent to proponent email: plansasubmissions@sa.gov.au

Christopher Rann

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Christopher

Family name: RANN

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: I am vigorously opposed to this plan. Imagine if they tried to do this in the parks of any of other major cities of the world. There would be rioting in the streets. So it's NO, NO from me.

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email:

Christopher Stabolidis

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Christopher

Family name: Stabolidis

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: We have an opportunity to become the Paris of the south if we can just develop our riverbank walk ways. There should be a green "highline" from Victoria Square down to both sides of the river with cafes and resturants looking back at the skyline. I not only support this development, this should have been done in the 70s and 80s.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Cliff Flower

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Cliff

Family name: Flower

Organisation: City Resident

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I have no issues with most of the proposed changes, but I am opposed to the new Riverbank Subzone to the northern side of the River Torrens between Kintore Avenue and the Torrens Weir to accommodate development. I run through there often and it is a lovely open green section of parklands, used by many people and occasional events so I disagree that it needs further activation. By all means continue to develop the southern side, but why do we need permanent food/beverage venues located everywhere on the riverbank? With two thirds of the population already overweight or obese it is obvious that most people eat and drink too much, so I dispute that people need more places to do so. It is not far to cross the river and go to the southern side, although sadly that is a significant walk for many people nowadays. I'm sure that supporters of this proposal will claim the benefits of new jobs, but the pandemic has shown us that jobs in the hospitality industry and especially casual ones cannot be relied upon. Also without population growth any new outlets would most likely damage existing businesses nearby and in the city. If people really need to eat and drink on the northern side of the river then I would much prefer allowing pop-ups or food vans at the southern entry to Adelaide Oval. I think Victoria Park is a great example of a place that is used by many people yet does not have catering everywhere, just in one small corner. Kevin Foley's ridiculous plan of permanent structures in the middle of the green space was thankfully rejected, and we all now realise it would have been a waste of money and become a white elephant. Permanent structures obstruct views and get tired and rundown over the years, and will detract from the natural beauty of the area. Please leave some of the riverbank just parklands so that those of us who are capable of cycling, running or walking kilometres without requiring sustenance can enjoy a more natural environment so close to the city.

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sent to proponent email: plansasubmissions@sa.gov.au

Colin Rogers

Sir. The Torrens riverbank belongs to South Australians. It does not belong to the current state government nor does that government have a mandate to change its use from general/flexible parklands recreation to a fixed stadium/entertainment centre.

Too much of the city's green space has been appropriated for purposes not intended by our city forefathers and is now not accessible to the majority of South Australians.

Australia is already lagging behind the world's target of carbon neutrality. The destruction of any parkland trees contradicts attempts to reduce global warming.

The destruction of parkland trees is the destruction of habitat.

The proposal to build an unnecessary stadium/entertainment centre and/or the commercialisation of this resource is a political gesture only and has no commercial, social or ecological merit.

Colin Rogers. [REDACTED]

Dale Bagshaw

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Dr Dale

Family name: Bagshaw

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: 'Rezoning the parklands should never be allowed. I am appalled by the proposal- our parklands are gradually disappearing. It is essential that they are kept intact for the next generation given climate change and our need for more trees surrounding our beautiful city. Why do us our State Development authority have four developers out of five members making decisions about our heritage areas? Surely there is a conflict of interest as their key interest is in development rather than conservation. Our beautiful city is rapidly being depleted of buildings and land which contribute to the city's appeal. I strongly object to the proposed rezoning.

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proponent plansasubmissions@sa.gov.au
email:

Damaris Sheldon

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Damaris

Family name: Sheldon

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I say a strong and emphatic NO to any more building on parklands. I say a particular NO to our parklands being turned into a sports arena or multi-storey carpark. The arena can be built anywhere and much better of being elsewhere. Adelaide Oval has already demonstrated the city's incapacity to deal with an influx of patrons, necessitating street closures etc. This inconveniences the people who ordinarily use the city's facilities on a daily basis. The New RAH is a monstrosity looming over the horizon of the end of my street shutting out the light from what used to be clear view to parklands - and I live in Mile End, not even close. Please be aware of the huge impact these short sighted ideas have if put into effect. How do you think a carpark is going to impact on the rest of the parklands - people won't want to go there any more. This will be more of the Marshall government's Repat debacle - elected on a mandate of saving the Repat only to pull it all down! Cannot be trusted. If you can't have a hospital without a carpark go build it somewhere else!

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sent to proponent email: plansasubmissions@sa.gov.au

Damien Mugavin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Damien

Family name: Mugavin

Organisation: Proxy Board Members, Adelaide Park Lands Authority

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: See attachment

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sent to proponent email: plansasubmissions@sa.gov.au

Riverbank Precinct Code Amendment

Submission: Riverbank Precinct Code Amendment

The change is being proposed via the Planning, Development and Infrastructure Act 2016.

The Adelaide Park Lands Status

The Riverbank Precinct is located in the Adelaide Park Lands, as defined by the Adelaide Park Lands Act 2005 (the Act). The Act remains in force. The Precinct Code Amendment via the Planning, Development and Infrastructure Act 2016 cannot change its status as Park Lands: such a change requires an act of parliament. The Act contains seven statutory principles that remain in force and that *require* that the Adelaide Park Lands should:

- Correspond with the general intention of Colonel William Light's first Plan of Adelaide in 1837

- Be held for the public benefit of the people of South Australia, and be available for their use and enjoyment
- Reflect and support a diverse range of environmental, cultural, recreational and social values and activities
- Provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City
- Contribute to the natural heritage and improve the biodiversity and sustainability of the Adelaide Plains
- Be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government
- Reflect the interests of the South Australian community in maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

Under the Act, the Adelaide Park Lands Management Strategy (endorsed by Adelaide City Council and the State Government in 2017) has instituted measures that establish policies in considerable detail that retain and utilize the green open space and to protect and conserve the Park Lands.

The clear requirements and ambit of the Park Lands is to provide open space, not serve as a land bank for built projects.

It is my submission that the Code Amendment is contradictory to the seven statutory principles of the Adelaide Park Lands Act 2005, and should not proceed.

This is why the statements within the code amendment documents that refer to the Park Lands as merely awaiting (infrastructure for) a range of land uses which elicit a focal point for entertainment, education, health and culture are very wrongheaded and invalid. There is no emphasis at all in the Code Amendment documentation that supports the Park Lands as green open space, and that is a dereliction of responsibility.

National Heritage Status

The Adelaide Park Lands and City Layout is included on Australia's National Heritage List, which states:

The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by Park Lands and is the most extensive and substantially intact nineteenth century park lands in Australia.

The Park Lands and City Plan is "substantially intact and reflects Light's design intentions with high integrity" One very significant aspect of that plan is that the River Torrens bed valley floor is retained as publically accessible continuous open space. This is a key innovation of Light's plan and essential to the National Heritage status. It is not privatised as is / was the case in England and Wales, where still today, less than 4% of rivers have public access. There, the vast majority of rivers are inaccessible to the public and the riverbank - the riparian owner - also owns the river bed.

Parts of the Adelaide Park Lands between North Terrace and River Torrens have been built over for various institutions, a casino, conference venues, hotels, a hospital and car parks. But in essence, it's

a river frontage Park Land. The remaining green Park Lands are used as open recreational space and allow park connections to and along the River.

Riverbank Subzone

Significant areas of the riverbank subzone are frequently utilized for a wide range of community arts and cultural events, without alienation of the parks: Elder Park, Pinky Flat, Barr Smith Walk. There are three cafes and two restaurants and several rowing clubs in the Riverbank Precinct utilizing existing (some heritage listed) buildings. In this arrangement, many large and small events are held on a temporary basis, so the area is essentially an open space with significant activation. There is no imperative to change existing planning provisions.

It is also relevant that the Kaurna significance of the River Torrens valley floor as campsite, ceremonial grounds and burial grounds is noteworthy and should be a prime impediment to widespread built form. More about that later in this submission.

Health Subzone

The zone, which extends to Kate Cocks Park (Park 27) and includes the Police Barracks and Old Adelaide Gaol is intended for the foreshadowed new Women's and Children's Hospital (nWCH) utilizing open space Park Lands to the west of the nRAH. The building would result in the nRAH and the nWCH being left without any open space for patients, other than out along North Terrace / Port Road, hardly conducive to patient well being. Co-location of the nWCH may have some advantages however, that has not been fully established. For example, a land area of 4 hectares was required for the recently rebuilt and standalone Royal Melbourne Children's Hospital. The proposed site is certainly too small.

It is very apparent that the proposed site is significantly under sized and inaccessible and cannot accommodate requisite facilities. It may also necessitate the rebuilding of some components of the nRAH, such as access roads/overpasses, several fire water storage bunkers and the stormwater detention basin, all recently completed as components of the nRAH. The proposed site of the nWCH is problematic to accommodate end of trip facilities, and for establishing a new location for SA Pathology.

The Riverbank Precinct Code Amendment's proposed Health Subzone is therefore envisaged to extend on to Kate Cocks Park (Park 27). A high rise commercial car park, SA Pathology and other essential functioning components of the hospital will abut and visually impinge over the heritage sites, given the bulky nature of car-parks, let alone the built form for the other essential day-to-day functioning components of the hospital.

It is submitted that the areas that accommodates the State Heritage sites of the Adelaide Gaol and the Police Barracks along with Kate Cocks Park is first and foremost part of the Adelaide Park Lands and it is totally contrary to orderly planning to impose a large bulky 'transport hub' into that area. The additional built form that the Riverbank Precinct Code Amendment would allow, is of such a scale it is at odds with the spirit and provisions of both the statutory principles in the Act and the Adelaide Park Lands Management Strategy.

The conclusion is clear: the Health Zone as proposed is inappropriate and too constrained to accommodate a nW&C hospital, and should not proceed .

Entertainment Subzone

The Entertainment Subzone extension throughout Park 27 to accommodate an entertainment arena, along with residential, commercial and health developments is a travesty of grandiose ill-considered delusion. Not only an arena but also the zone envisages a height guidance of 20 building levels and effectively, cannot provide a transition down in scale toward the river. Park 27 is narrow enough as it is, and the arena would inevitably occlude east –west connection of green space, access to the river frontage and the perversely configured pedestrian / cycle path ways. It would also involve removal of numerous substantial trees. Additionally, this area is clearly not readily accessible for spectators and servicing vehicles, being fenced off by the Morphett Street overpass, the rail lines and the River Torrens. It has been suggested that an underpass might be constructed under Morphett Street, however that would necessitate the expensive and disruptive reconstruction of the southern end of the Morphett St overpass, where it is hemmed in by adjoining buildings.

An arena, by its very nature, is an inwardly oriented structure that turns its back on the river. It will inherently not provide an active frontage to the river and likely there will be insufficient setback for a reasonable level of riverine amenity and r east-west pedestrian and cycle access.

It must also be noted that the arena footprint would need to extend well beyond the perimeter to allow for safe spectator egress.

The concept of introducing an arena in this locality is entirely capricious and unreasonable and needs to be entirely reconsidered.

Innovation Subzone

Frome Park / Nellie Raminyemmerin, between the new Botanic High School and the Lot Fourteen site, was remediated and reclaimed as Park Lands from a former car park in the late 1990s, work carried out by Adelaide City Council. ACC owns the site.

The code amendment for the subzone (dated 10/9/21) calls up Desired Outcomes and Performance Outcomes that reflect those of Lot 14. The diagram “Concept Plan 85” clearly shows the same policies applying across the whole of the area including the open space between the new Botanic High School and the Lot Fourteen site. These DO and PO, which envisage commercial high rise buildings, are inappropriate to open space and should not apply to the Park Lands. It’s a slight of hand (i.e. cunning deception) to suggest that the open space character is assured by Concept Plan 85:

The site contains a fully authenticated and documented Kaurna Aboriginal burial site; the human remains have been retained in place and capped. That has been recorded and protected, listed on the Register of Aboriginal Sites and Objects, Aboriginal Heritage Act 1988. It cannot be disturbed. The code amendment is clearly blissfully unaware of the registration and it has emerged that there has been no consultation with elders, which has been rightfully describes as ‘insulting’ and ‘distressing’. It is not sufficient to state that the registration might be dealt with at detailed design because the code amendment assumes that the registered sites do not affect land use and can be ignored during code amendment. It is also of note, since the opening of the high school, some of the registered sites have been commandeered as school grounds used for recess activities.

Rezoning the area that includes the registered sites is a gross travesty and arguably amounts to maladministration. One is reminded of governance surrounding the culpable actions of Rio Tinto at Juujun George in May 2020.

This area of Park Land is also extensively contaminated and had to undergo audited remediation by burial and capping in order to meet the required standard applying to open space. Under current

regulations the site cannot be disturbed unless the whole of the contaminated material (which is about 1.5 M deep across most of the site) is removed to a regulated disposal site.

No valid reason has been established for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone) and indeed, in reality, it's nonsense, in that the area is precluded from such uses for the reasons given above. **The rezoning puts Frome Park at risk as it enables the transition from open green space to an ancillary area for Lot Fourteen and Botanic High School.**

Summary

The Riverbank Precinct Code Amendment clearly envisages more built form and further loss of open space. The removal of land from the Adelaide Park Lands Zone in the Riverbank Precinct Code Amendment sets up a planning framework that could lead to development which is inconsistent with Park Lands values and the requirements of the Act. This includes an increase in buildings, particularly the scale of such buildings, reduction of open space and public use, effectively, alienation of public land.

Large-scale built form, such as sporting arenas, commercial car parks and residential or commercial buildings, are completely at odds with the statutory principals under the Park Land's Act including:

- the land comprising the Adelaide Park Lands should, as far as is reasonably appropriate, correspond to the general intentions of Colonel William Light in establishing the first Plan of Adelaide in 1837; and
- the interests of the South Australian community in ensuring the preservation of the Adelaide Park Lands are to be recognised, and activities that may affect the Park Lands should be consistent with maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

The Adelaide Park Lands are a key feature of the State Government's bid for Adelaide to become a National Park City. Facilitating further built form development and enabling the commodification of the Park Lands is inconsistent with this ambition.

In addition, because of the potential impacts on the National Heritage Listing of the Adelaide Park Lands and City, the proposed Riverbank Precinct Code Amendment, Riverbank Arena and commercial car park associated with the nWCH, such momentous policy proposals and developments deserve consideration as actions which may affect the National Heritage Listing, in accordance with the requirements of the Commonwealth Environment Protection and Biodiversity Conservation Act 1999.

It is submitted that the Code Amendment should be referred to the Aboriginal Lands Parliamentary Standing Committee, which has a current enquiry into Aboriginal Heritage protection. The proposal should also be referred to the Parliamentary Standing Committee Environment, Resources and Development, as a priority.

Damien Simmons

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Damien

Family name: Simmons

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

To be frank, this proposal is appalling. Starting with the newly proposed health zone: How are you going to create space when capacity is reached? We already know the proposal of the hospital barely increased capacity of the ED at the very least. So is your proposition to put the hospital in and then "rezone" more of the area? Second, the Bonython park play space is an area that hosts an LARGE number of ethnic groups during the spring and summer months. This gives those users opportunities to interact where the normally would not. What you propose is going to absolutely affect this area. Third, this area is also home to significant bird and wildlife. Your proposal is going to significantly impact the peacefulness of this area. This zone is short sighted at best, and ecologically and community destroying at worst. The Entertainment zone: You are putting in an Arena, when the last two years, the current one has barely reached capacity. You are MASSIVELY destroying significant areas where people ride and recreate for a development opportunity. The destruction of trees in this area and addition of huge amounts of concrete and steel will result in a hotter Adelaide CBD and due to climate change, your venture will make a "less liveable Adelaide." - don't expect to be third on the "most livable city" list for long. Here is a thought: If you are going to be making a new arena, how about you decommission the old one and turn that into a medical precinct? The River bank precinct: Your report suggests that "The Precinct largely comprises vacant open space along the riverbank." - no, it has trees, opposite the area, let's not muddy the waters with how you define this. Trees area not "Vacant open space" - the contribute significantly the greening of Adelaide and provide a significant mitigation to effects of climate change and urban heat island effects. Proposing to allow "small shops" means you also need "small carparks" and then "small outdoor eating areas"

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Dan Dunbridge

I was born in Adelaide but I now live in Melbourne. I only stay in Melbourne because of work. The rapid building boom in Melbourne has left it a overcrowded and cold business district that cares not for the city or people really and will only ever keep taking from them with little return. Once redeployment is done it is never undone. What is proposed will only erode and can never add.

The proposed hospital district will promise much but similarly fated. Beautiful Hospital designs are all well and good but in the end they are built to budget and over time they are always added to due to operational needs and encroach on the land around it; ie the children's hospital in Melbourne. Contrasting this is the peter Mac building who with much additional funds built a hospital that is a hollow shell ,that can never be expanded and is reliant on the royal Melbourne for services already - but its good p.r opportunities for the (liberal) government of the day.

A much better idea for a health care district, near public transport and services is to utilise some of the vacant modern office buildings in the cbd. Any modern hospital would utilise the same industrial building methods anyway and you are guaranteed floor space.

Adelaide's parklands, whilst nice, are surrounded by a very busy road system and are busy themselves with people, you should be looking to preserve and expand that parkland and not take a decision that alters the character of the whole city irreparably.

Daniel Gannon (Property Council of Australia)

Thank you for the opportunity to make this submission on behalf of the PCA. Please find attached.

Kinds Regards

Richard Fowler | SA Policy and Media Manager

Property Council of Australia

Level 5, 19 Grenfell Street, Adelaide, SA 5000

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Australia's property industry

Creating for Generations

27 October 2021

Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

By Email: plansasubmissions@sa.gov.au

Draft Riverbank Precinct Code Amendment

Thank you for the opportunity to provide a submission in relation to the *Draft Riverbank Precinct Code Amendment*.

The Property Council of Australia is a strong public advocate for social infrastructure and hence we extend our continued support to the State Government in progressing state significant infrastructure in the Riverbank Precinct. This includes the development of the new Women's and Children's Hospital and Riverbank Arena.

The Property Council is particularly interested in focusing on the Code Amendment insofar as it flags a potential rezoning of land west of Montefiore Road from Adelaide Park Lands Zone to City Riverbank Zone, Entertainment Subzone (and a portion of land already in the City Riverbank Zone changed from Health Subzone to Entertainment Subzone).

The current Entertainment Precinct is a key economic activity zone within the Adelaide CBD, stimulating visitor spending from within South Australia, interstate and abroad.

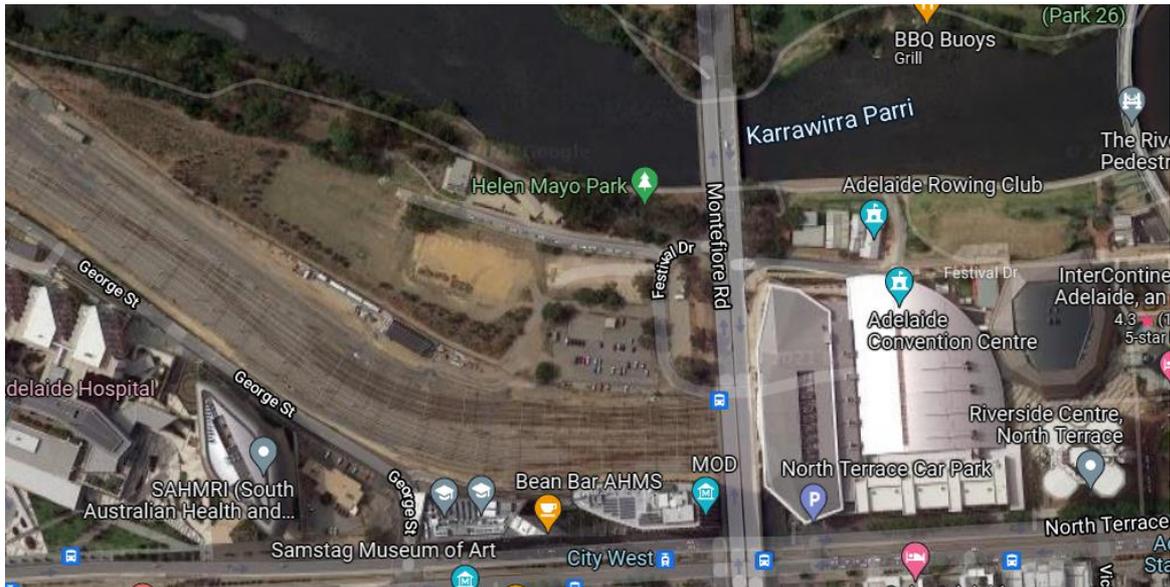
The Property Council recognises the recent and historic non-partisan development of this important precinct which has added to the amenity and economic attractiveness of the Adelaide CBD. This includes the SkyCity Casino redevelopment, the iconic Footbridge, stages one and two of the Adelaide Convention Centre, and the Festival Plaza upgrade.

As part of the State Government's broader vision for the Riverbank precinct as a premier health, entertainment, and cultural boulevard, the Property Council notes that the *Draft Riverbank Precinct Code Amendment* indicates that this land – adjacent to the Entertainment precinct – has "potential to complement existing entertainment, tourism, food and beverage offerings including the Adelaide Convention Centre and Adelaide Oval."

PROSPERITY | JOBS | STRONG COMMUNITIES

Land to the west of the current Entertainment Subzone – north of the rail corridor – provides one of the few remaining sites for additional investment and activation of the Riverbank.

Whilst contained within the Adelaide Park Lands Zone, this portion of land is presently used for a range of non-envisaged activities including car parking, passive materials and equipment storage, open space and buildings utilised by rowing clubs. The map below speaks to this point.



The Property Council has long been committed to environmental sustainability and consultation with traditional owners. The Adelaide Park Lands are a key feature of the city's natural landscape and a key aspect of its ecological and indigenous heritage.

It is important that genuine and meaningful consultation is undertaken throughout the *Code Amendment* process to achieve a set of outcomes that balance the concerns and sensitivities of stakeholders representing these interests with the need to grow, activate and rejuvenate Adelaide's economy.

As an advocate for sustainable economic growth and opportunity, the Property Council therefore takes this opportunity to outline its response to the *Draft Riverbank Precinct Code Amendment* seeking to balance economic opportunity with the need to preserve the environment and character of Adelaide.

1. The Property Council supports the rezoning of the land west of Montefiore Road from City Riverbank Zone, Health Subzone to City Riverbank Zone, Entertainment Zone, which will provide for a higher public use of the area and improved and safer connectivity around the Riverbank precinct and wider parklands.
2. The Property Council supports the rezoning of the small slither of land west of Montefiore Road from Adelaide Park Lands Zone to City Riverbank Zone, Entertainment Subzone. This parcel of land is surrounded by City Riverbank Zone and in its current developed form – an open-dirt car park – serves no public benefit. This proposed amendment will continue to encourage a diverse range of land uses that connect the city centre to the natural environment of the River Torrens and Adelaide Park Lands focusing on entertainment and tourism.

3. The Property Council strongly supports the inclusion of “arena” to the list of envisaged land uses under the City Riverbank Zone, for the same reasons listed above, as well as the amendment seeking improved east-west connections through the New Royal Adelaide Hospital and over Montefiore Hill Road within the City Riverbank Zone, Entertainment Subzone. The proposed Riverbank Arena provides Adelaide with an opportunity to develop a key CBD infrastructure asset that will act as an economic multiplier through events, conferences, concerts, sport, and exhibitions, increasing CBD expenditure and lifting the profile of Adelaide as a premier events destination.
4. It is noted that Performance Outcome 1.2 of the Entertainment Sub Zone allows for “residential development only where it is demonstrated that noise, light spill and other impacts on residential amenity associated with the envisaged mix of uses and a vibrant public plaza can be adequately addressed.” The Property Council **does not** support private residential development in the Zone but does support the development of “entertainment-related uses” that will complement the existing social infrastructure in the City Riverbank Zone. Consideration should be given to the removal of Performance Outcome 1.2.
5. The Property Council supports rezoning of a portion of the Adelaide Park Lands Zone to City Riverbank Zone, Health subzone in the form of adaptive reuse of the already developed lands of the Police Barracks and Old Adelaide Gaol to enable the future expansion of the state biomedical precinct, provided it “complements the historic values and Park Lands setting of the locality” as per the requirements of the Code Amendment.
6. The Property Council proposes that for any loss of Park Lands through development on re-zoned land, an equal or greater amount of Park Lands space be rejuvenated within the Park Lands to improve biodiversity, tree canopy and ecological outcomes and better align them with their Design Outcome of being a safe “publicly accessible and well-connected open space system.”

Riverbank Arena – general

The Property Council firmly believes that the Riverbank Arena will kick-start an exciting wave of urban renewal in Adelaide that utilises the Riverbank as a uniquely South Australian waterfront asset to promote our state. However, if we only view the Arena through its own development lens then we are missing the bigger picture, especially in a post-pandemic world.

South Australia’s COVID performance and ranking as the world’s third most liveable city must be leveraged globally to grow our population and economy.

The Arena has the potential to link the Riverbank and bio-medical precincts while driving jobs-rich private sector opportunities that keep South Australian talent from seeking employment opportunities interstate and abroad.

The ‘helicopter view’ becomes compelling with unique cultural and tourism experiences that tell the Riverbank story, linking visitors and locals alike with the East End, West End and River Torrens.

We cannot simply cross our fingers and hope that investment and tourists will flock to Adelaide in a post-pandemic environment – we have to make it happen.

Adelaide City Council

The policy confusion from South Australia's capital city council has been, to say the least, disappointing, and counterintuitive.

In March this year when Premier Steven Marshall announced a new 15,000-person multipurpose indoor centre in the Adelaide Riverbank precinct, Lord Mayor Sandy Verschoor could not have been more explicitly supportive. *The Advertiser* reported on 19 March 2020:

Lord Mayor Sandy Verschoor said a new concert, sport and major events facility would "obviously generate great economic, social and cultural outcomes for the city."

Ms Verschoor said a bigger entertainment centre would enable Adelaide to "attract larger events and headline acts, which would have positive impacts for our local businesses, particularly our hospitality and tourism industry."

These views were welcome and progressive in terms of augmenting Adelaide's skyline and attracting people and investment to our city. Fast forward to 26 October 2020, when the Lord Mayor used her casting vote to ensure the Adelaide City Council registered its objection to the Arena.

"I used my casting vote as I hold genuine concerns about built form in the entertainment sub zone..."

Furthermore, the Adelaide City Council has been accused in the past of jeopardising inbound investment. *The Advertiser* reported on 19 May 2021:

Overseas investment in Adelaide could potentially be at risk because of comments made by some city councillors, according to an official register.

This is not the right approach if Adelaide is to continue to attract investment in a post-pandemic environment.

If you would like to discuss any of the following, please don't hesitate to contact me.

Yours sincerely



Daniel Gannon | SA Executive Director

Daniel Mabarrack

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Daniel

Family name: Mabarrack

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Fully support the changes. It would be great if the existing pathway around the Torrens from Kintore Avenue to the Weir is retained and landscaping/pathways improved as part of any upgrade work. Would also like to see significant trees in this area retained as it adds a lot of character and greenery to the area. Apart from that, I think the proposed arena, relocation of the Womens and Children's and activation of the riverfront is fantastic for the state. Looking forward to seeing it done!

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sent to
proponent email: plansasubmissions@sa.gov.au

Daniel Marx

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Daniel

Family name: Marx

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: My family and I are very strongly opposed to any development occurring on the Adelaide Parklands, including the Riverbank precinct. Adelaide's Parklands are almost unique in the world and they are one of the only unique selling points Adelaide has compared to other cities. They are one of the reasons my family and I chose to move from overseas and settle in Adelaide and they are always one of the key things that wows our overseas visitors. Government and council have a responsibility to preserve the parklands. Once they are gone, they will be gone forever. It is not as if 15 years after first building apartment buildings and carparks on the parklands, someone will decide to demolish them and return them to parkland. We must keep them as parkland forever. There are so, so many other areas around metropolitan Adelaide that could be developed into stadiums, hospitals, parking buildings, apartment buildings and the like without needing to encroach on the parklands.

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proponent email: plansasubmissions@sa.gov.au

Daniel Minther (ARTC)

Hello

Please find attached ARTC response on the code amendment proposal.

Thank you,

Daniel Minther
Property Officer
Interstate Network

P. 08 8217 4138

M. [REDACTED]

E. DMinther@ARTC.com.au

Australian Rail Track Corporation
11 Sir Donald Bradman Drive
Keswick Terminal SA 5035

artc.com.au

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September 27, 2021

Attention: Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5000

Dear team,

RE – Notice of consultation – Riverbank Precinct Code Amendment

Thank you for the opportunity to comment on this amendment to the Planning and Design Code.

The component of the proposal which we would like to address pertains to the rezoning of land to accommodate the new location of the Women's and Children's Hospital. ARTC is already in discussions with DIT with regard to the construction of the nWCH and associated infrastructure. However, the extension of the Health Zone has raised concerns as to the potential implications on ARTC's operations.

We are seeking clarity from the Planning Authority that the new zone classification will not restrict ARTC's rights and obligations in managing the Interstate Rail Freight Network, including any future development over the land.

If you would like to discuss further, please contact the undersigned.

Kind Regards,



Daniel Minther
Property Officer – Interstate Network

Daniel Pattingale

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Daniella Nofi

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Leave our parklands as originally planned.

Daniella Nofi

Darren Peacock (National Trust of South Australia)

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Community Group

Given name: Darren

Family name: Peacock

Organisation: National Trust of South Australia

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please find submission attached.

Attachment: NTSA_Riverbank_Code_Amendment_27_October_2021_-_Submission_National_Trust_of_South_Australia.pdf, type application/pdf, 162.8 KB

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sent to
proponent email: plansasubmissions@sa.gov.au

27 October 2021

By email:

https://plan.sa.gov.au/have_your_say/general_consultations/public_feedback_on_initiated_code_amendment?aid=Riverbank_Precinct_Code_Amendment

Riverbank Precinct Code Amendment- Submission by the National Trust of South Australia

The National Trust of South Australia is a community-based charity with more than 6 000 members and volunteers across the state. Since its establishment by an Act of Parliament in 1955, the Trust has worked to protect, preserve and promote South Australia's built, natural and cultural heritage. We submit that the Riverbank Precinct Code Amendment should be rejected in its entirety as it proposes land use changes completely at odds with the purpose and public value of the Adelaide Park Lands, fails to acknowledge the cultural heritage values it would damage- both in respect of the Kurna people and in regard to the national heritage values associated with the recognition of the Adelaide Park Lands on the National Heritage list.

The Riverbank Precinct Code Amendment lacks necessary detail and is devoid of any substantive argument, business case, or policy justification. It is instead mostly a string of glib buzz words- "entertainment" (84 times) "innovative/innovation" (48 times) and "activation" (26 times). There is no examination of the impacts of the proposal on heritage, trees or urban warming.

The consultation process is grossly inadequate in terms of the potential impact of the changes proposed and is disrespectful to the Kurna people as the traditional custodians of this area. In summary, the proposal and the consultation around it is an outrageous act of disrespect to all South Australians and should be roundly condemned as the shameless grab of public land for private development that it clearly is.

It marks a new low for the Government's new planning regime with its misuse of powers provided under the *Planning, Development and Infrastructure Act* and presents a compelling justification for the urgent reform of both.

Dr Darren Peacock

Chief Executive Officer

Darryl Carpenter

To Whom It May Concern

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards

Darryl Carpenter

[REDACTED]

Unley 5061

[REDACTED]

David Andrewartha

I have several concerns about the changes. I don't want to see any permanent changes to pinky flat.

I don't want to see too much land taken up with the development of the new wch and i don't see why a roof could be built over the railway lines and the hospital and or carpark built on top of that.

I don't see why the olive grove has to be destroyed to make a car park. The history of the olive grove with the police barracks and adelaide gaol should be preserved for future generations.

I'm not against a sporting arena but it must fit into the area and not overshadow the riverbank or block any paths that go around the river/lake.

I don't want to see any changes in codes around Botanic High school- they have access to the university sporting ovals nearby. I would be disappointed if a change in code could result in another building in the area.

I am not aware of any proposed changes to the entrance to the zoo.

Overall it is critical to preserve the land of the parklands for future generations.

I notice that the promise of extra land returning to the Botanic Gardens has not occurred in the planning of lot 14 so far.

David Andrewartha

Ph [REDACTED]

email: [REDACTED]

David Cruickshanks Boyd (5049 Coastal Community Association)

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Community Group

Given name: David

Family name: Cruickshanks Boyd

Organisation: 5049 Coastal Community Association

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments:

We are deeply concerned that the consultation the Riverbank Precinct Code Amendment is seriously flawed, for the reasons stated below, and: We therefore ask the Minister to defer decision on the Code Amendment, and instruct the department to develop a thoroughly consulted, well informed and progressive Master Plan, consistent with the social, historic, tourism and biodiversity values, before endorsing any Code amendment. Refer attached pdf document

Attachment:

5049CC_submission_to_the_Riverbank_Precinct_Code_Amendment.pdf,
type application/pdf, 536.3 KB

sent to proponent
email:

plansasubmissions@sa.gov.au



5049 Coastal Community *Stronger together*

www.5049coastalcommunity.com
0416 20 5049 5049communicator@gmail.com
PO BOX 902 Brighton 5048

27th October 2021

SUBMISSION BY THE 5049 COASTAL COMMUNITY ASSOCIATION (A MEMBER OF THE COMMUNITY ALLIANCE OF SOUTH AUSTRALIA)

RE: Consultation: Riverbank Precinct Code Amendment

The 5049 Coastal Community Association (5049CC) is a member of the Community Alliance of South Australia (CASA) and our aims are to support developments which enhance the sustainability of the community and the environment, and which ensure that the community's rights to informed participation are preserved. This is essential if we are to **protect and safeguard our heritage for future generations.**

We are deeply concerned that the consultation on the Riverbank Precinct Code Amendment is seriously flawed, for the reasons stated below, and:

We therefore ask the Minister to defer decision on the Code Amendment, and instruct the department to develop a thoroughly consulted, well informed and progressive Master Plan, consistent with the social, historic, tourism and biodiversity values, before endorsing any Code Amendment.

OUR CONCERNS

- Consultation on the Riverbank Precinct Code Amendment does not comply with the Community Engagement Charter as prescribed under the provisions of the Planning, Development and Infrastructure Act because the engagement is not well informed or sufficiently transparent. This is especially of concern given the statewide significance of the Adelaide Parklands.
- The short consultation timeframe assumes high-level professional planning knowledge, which is unreasonable and has potential to alienate the broader South Australian community and thus discourages some respondents from participating.
- The general public, despite the substantial documentation provided, find the portal access to the details difficult. It is almost impossible for the public to comprehend PlanSA's fundamental proposals.
- Although this consultation purports to encourage feedback that has potential to influence the outcome, in reality the scope is tightly restricted by PlanSA. Moreover, this restricted scope is not prominently highlighted. The 'consultation' is, in effect, an

'information-only' notification to the general public. To refer to this as 'consultation' is disingenuous.

The Adelaide Park Lands are unique in Australia, with no known counterparts elsewhere in the world. They date from 1837, when the new town of Adelaide and its dormitory of North Adelaide - completely encircled by Park Lands, as Colonel William Light, the first Surveyor General intended – were surveyed.

The uniqueness of the Adelaide Park Lands was recognised on 7 November 2008 when they received Australia's highest heritage honour by being included in the National Heritage List.

Over time the area of the Park Lands has reduced from 931 hectares to around 233 hectares, and this proposed rezoning will involve a further 70 hectares of Park Lands space. It must not be allowed to proceed without thorough informed community consultation.

Kind regards

Dr David Cruickshanks-Boyd



5049 Coastal Community Association

5049communicator@gmail.com



David Gomer

I reject the Government's so-called "vision" for the Adelaide Park Lands.

Open Green Public Spaces do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage. Not happy, David Gomer

David Grybowski

I am opposed to the planned re-zoning of Adelaide Parklands to facilitate proposed uses including a multi-storey car park, new hospital, a 15,000 or so seat stadium or arena and expansion of the biomedical precinct in Park 27.

The Government must stop using the Park Lands as a land bank for development. They are currently enjoyed and engaged as park lands. The use of green public space - we have found out - is paramount to good mental health for urban dwellers living in increasingly smaller units. We love our parks so much we want them to be heritage-listed. The parks are an important element in what makes Adelaide a place unique in the world. We shouldn't be destroying our best asset.

Importantly, the re-zoning provides the government with a blank cheque for additional and currently unspecified development, which may occur without further public scrutiny if this blank cheque to develop is passed.

David Grybowski

████████████████████

Gratitude, generosity, compassion, forgiveness,
respect, integrity, hope and love of Creation
are the qualities of a good life.

David Jones

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: David

Family name: Jones

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: The parklands must stay as open space. This is a black and white issue. Stop chipping away at the parklands.

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sent to proponent email: plansasubmissions@sa.gov.au

David Ladd

Hello - my thoughts on latest plans for River Torrens City Parklands

I reject the re-zoning plans of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

Areas around the RAH deserve some remediation back to parklands with Adelaide plains vegetation. We have places like the Brewery site that could possibly be used to make an excellent entertainment site adjacent the Parklands. Don't think our valuable open space is just there to be gobbled up by more buildings.

The River Torrens paths are very important to cyclists recreationally and as commuter paths. Cycling transport should be encouraged and indeed with minimal infrastructure to cope with increasing cyclist and share with pedestrians,

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Thanks, David

David Lewis

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: David

Family name: Lewis

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Adelaide has a real opportunity to become a Green City that reinforces a commitment to our parklands and 'greening' the city/suburbs to support the wellbeing of our total environment: wildlife, trees/social wellbeing and a healthy, green heritage for future generations. 'Development' that is simply about economic growth is not necessarily in the best interests of our society and environment over the long term. This is not simply about saying 'no' to any environmental improvements, but more buildings on our parklands are not the answer to a better Adelaide.

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sent to
proponent plansasubmissions@sa.gov.au
email:

David Monceaux

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: David

Family name: Monceaux

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments:

Dear sir I write on behalf of myself, my wife, and our son and his wife. Also I have many friends at the Burnside Historical Society which has 120 members, who agree with us but who are unlikely to make a submission. We all strongly object to the proposed Planning Zoning changes to the Torrens Riverbank Precinct that would allow more structures to be built here and cause the loss of vegetated parkland. We want the existing zoning protection of the parkland to be continued. The joy of the area is that it is undeveloped and an escape to nature. Many other cities have destroyed their parklands to the detriment of people who use it, and just to benefit developers and business. We must learn from their mistakes. We already have a large and successful use of these parklands. The Zoo, Jolley's Restaurant and café, Festival Theatre café, Weir Restaurant and kiosk. It is enough. These facilities could be improved to provide more in their own areas without increasing their footprint and without reducing the area of parkland. If the Women's and Children's Hospital is to be built in the parklands it must have a minimum footprint so that a minimum of parkland is lost. The area west of the railway line is a unique and valuable Historical zone of the Goal and Olives, that must not be built on, overshadowed and crowded out. This area must be retained intact. If necessary, the hospital building can be built partially over the railway lines and all carparking must be underground, so that it does not sprawl out unnecessarily destroying more parkland than is absolutely necessary. The whole Riverbank Precinct is unbuilt, unspoilt and is a beautiful restful area and a refuge for workers in the city, visitors and wildlife. It provides an opportunity for an escape from the hurly burly and noise of city life. This long strip of well vegetated parkland allows for long walks and runs near the soothing river. Additional development would destroy the peaceful atmosphere of the riverside area.

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sent to
proponent
email:

plansasubmissions@sa.gov.au

David Morgan

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: David

Family name: Morgan

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do not support any further alienation of parklands for other uses. Hospitals should be elsewhere. I believe that the old RAH site should have reverted to the Botanic Gardens. Destruction of heritage buildings, and commercial activities on parklands are particularly obnoxious.

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sent to
proponent plansasubmissions@sa.gov.au
email:

David Ness

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: David

Family name: Ness

Organisation: C/- University of South Australia

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The Adelaide Parklands should be used in their natural state for public purposes, and not usurped for commercial purposes. Adelaide should differentiate itself from other cities as a National Park City and Sustainable City. Further encroachment on the Parklands such as this is inconsistent with and will jeopardize those goals. Adelaide also aims to be a carbon neutral city. Again, so called commercial development flies in the face of this objective, especially due to the (overlooked) carbon embodied in production and construction which can equal as much as operational carbon. With COP26 approaching, it is imperative for our Government and Council to reduce absolute carbon emissions. This requires us to restrain further new commercial 'development' and make better use of all the vacant space in the city and surrounds. Thank you Adjunct Prof David Ness

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sent to
proponent plansasubmissions@sa.gov.au
email:

David Parsons

To whom it may concern,

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kind regards,
David Parsons

David Paull

Dear Your Say Chairperson

I am not in favour of encroaching on any of the riverbank or any of the Parklands for any buildings. Especially if the riverbank is part of the River Torrens flood-plain as I don't believe we should have any further buildings on any flood-plain in South Australia. I consider the riverbank is the same as our Parklands and should remain free of buildings.

However, I am in favour of building another Women's and Children's Hospital somewhere, PROVIDING, that the existing W & C Hosp remains as a hospital, even if continues life as a general hospital. We desperately need another public hospital as it was a big mistake that our present government did not reverse the decision of the previous government and keep all or part of the old Adelaide Hospital going.

Yours sincerely

David Paull BSS(ComDev)

[REDACTED]

[REDACTED]

[REDACTED]

David Rathman

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: David

Family name: Rathman

Organisation: N/A

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: As a member of the South Australian community it is important to ensure what open space that remains in the city and suburbs is not eroded by encroaching developments. An open space policy needs to be urgently considered by our community if we are to preserve parks, gardens and native plant reserves. There is an unhealthy belief that if you don't impose developmental principles over country it is wasted space. Adelaide has experienced an unhealthy creep in development on the parklands and it is our civic duty to halt all built structures that remove open space. In regard to having more commercial activity along the River Torrens is a backward step and removes my right of access to enjoy a community space. Alcohol is well represented throughout the many existing licensed premises, further expanding such facilities will fuel more drunkenness and antisocial behaviour. The state needs to be more aligned with creating an international standard green belt that is clean and worthy of a 21st century outlook which preserves the planet and respects country. Development codes are not the answer, because our future requires us all to preserve our green open space to avoid infill the curse of human existence. As an Aboriginal person I agonise over the destruction of natural bush and this continuous growth in development at all cost. Pinky flat was an important camping area for Kurna people as were many areas along the Torrens River. I truly believe the parklands are important as special place for all to enjoy and it is not there for developers and businesses to exploit.

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sent to proponent email: plansasubmissions@sa.gov.au

David Shannon

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: David

Family name: Shannon

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The intent of Light's plan for the City of Adelaide was to have two zones for the city surrounded by open space. Over time this has been eroded by the construction of roads, buildings and other ancillary spaces mostly associated with sporting activities. I do not support any attempt to reduce the area of open space in the parklands. If there is to be any increase in the built form of any type there should be a corresponding equal area of land returned to open space.

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sent to
proponent email: plansasubmissions@sa.gov.au

David Whitten

I oppose any further re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

THESE AREAS SHOULD NOT BE SACRIFICED as if they were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands .

David Whitten. Resident of South Australia.

Dean Philp

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Dean Rowe

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Dean Rowe

[REDACTED]
[REDACTED]

Deane Butcher

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Deane Butcher
Wyndbourne Park

Deane Kemp

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Deane

Family name: Kemp

Organisation: N/A

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: See attached document covering my concerns.

Attachment: Adelaide_Parklands_Rezoning.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 14.1 KB

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sent to proponent email: plansasubmissions@sa.gov.au

Adelaide Parklands Rezoning

Adelaide is a unique City, the world's only city completely surrounded by parklands, or Park Grounds as Colonel Light named them, bisected by the River Torrens.

The Parklands are a significant remnant of the initial planning for Adelaide. The ring of green lands circling the city was conceived by Colonel William Light, Colonial Surveyor General, and was included in the original plan for the city in 1837.

The founders of Adelaide foresaw the need for some special public buildings to be on the Parklands but much damage has been done since then to the extent that parts of the Parklands are excluded from the National Heritage List. The Parklands should be considered for World Heritage Listing.

I object to the rezoning for land west of the Royal Adelaide Hospital. This all a gross infringement on the river bank and its history. Out of respect for the Kaurna people the Entertainment Subzone and the new Riverbank Subzone in particular with cafes and shops should not proceed as this area is of great cultural significance to them. It will also spoil a delightful part of Adelaide.

The picturesque Adelaide Oval was destroyed except for the scoreboard and with the recent redevelopment blocking the view of the City from Light's Vision. Hotels and office buildings also should not be in the Parklands.

The opportunity for the new Women's & Children's Hospital to occupy the former RAH site has been lost. Explore other opportunities within the City and around the outer perimeter of the parklands with easy access to public and private transport.

Deane Kemp FIEAust

Former inaugural member of the State Heritage Authority

2021_10_25

Deborah Moran

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Deborah

Family name: Moran

Organisation: Naturopath/ Health Therapy

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Absolutely NO to any disturbance or alteration to our magnificent Riverbank Precinct, our Adelaide Parklands. Our Adelaide community and tourists love the natural splendour, the wildlife and 'green' natural environment for enjoyment, pleasure, cultural activities, music and mental health.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Demetrios (Jim) Bastiras

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Warmest regards,

Demetrios (Jim) Bastiras.

Denise Moss

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Our parklands are unique and hold National Heritage listing. Adelaide was named as the world's third most liveable city in 2021.

If rezoning and developments continue on our parklands like the proposed stadium, we will turn our parklands into a concrete eyesore.

Please remember, the parklands belong to the people, not politicians and City councillors.

I am proud to be a South Australian and commend the Premier and SA Health for keeping us safe during Covid.

Please don't disappoint the people who support you by destroying Adelaide's beautiful green open public spaces which, play a major part in our health and well being.

Thank you
Denise Moss

Denise Wangel

I am 88 years of age.

Park 2, Denise Norton Park, containing the Aquatic Centre, is named after me.

It is part of the national heritage listed Adelaide Parklands.

Development is the act or process of growing or causing something to grow.

Climate change tells us that we need to grow with plants, in nature, not with concrete.

I look out onto Victoria Park, which is being re-greened.

It warms my heart to see multicultural groups playing sport together here on the weekends, in a safe place.

No concrete needed for this wonderful Parklands entertainment centre, just grass and trees.

This is true development, not concrete buildings.

It is reprehensible that the SA State Government wants to rezone a large area of our heritage listed Parklands to allow building.

Bars and multistorey buildings and hospitals and carparks do not belong in our Parklands.

Parklands mean trees and bees and quiet places to think and play in nature.

I will likely be dead in this decade.

I want to leave behind a living Parklands, not a concrete jungle.

Do not rape and pillage the Parklands. They are not free building land. They are priceless.

A mature government plans for future generations, not for short term perceived monetary gain.

No rezoning. No building. Only re-greening.

Regards

Denise Wangel – Norton

Diane Campbell

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Diane

Family name: Campbell

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please reconsider the proposed rezoning. I often walk with groups - the remnants of the "keep walking SA" groups established I think some years ago under the "Life be in it" umbrella. During the summer we must avoid the Heysen, which is closed, and many of the Hills Conservation Parks which are closed on days of high fire danger. This is when we most value the linear parks, and particularly those along the Torrens which are well maintained, have areas of shade, and have multiple points of access via public transport. Adelaide has, compared with most cities, very limited permanent waterfront space. Those of us who don't live near rivers should be allowed to share the beauty that is there – and it isn't as though the spaces are underutilised; any weekend there are families out and about walking, cycling and picnicking. Conversely, the shops and hotels that are in the CBD keep complaining that they haven't enough customers; the City of Adelaide has been working with them with FOMO and other street parties, but doesn't this mean that no more are needed? If it does appear that there is a need for more accommodation during peak periods or attractions, perhaps the City could advise the outlying hotels – many provide shuttles to airports, there's no reason why they couldn't offer that to Memorial Park for tennis, or to the football stadium, and perhaps Adelaide Metro could assist. I have now lived in each of the Capital cities for some time. Adelaide is, I think, the loveliest, and its because of the parklands and particularly those abutting the Torrens. I believe that the answer to urban sprawl is higher density housing in the CBD and inner suburbs, but that can't be done while decreasing greenspace available without compromising the health and wellbeing of inner city residents.

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sent to proponent email: plansasubmissions@sa.gov.au

Submission two:

Dear Mr Marshall

Please reconsider the proposed rezoning.

I often walk with groups - the remnants of the “keep walking SA” groups established I think some years ago under the “Life be in it” umbrella. During the summer we must avoid the Heysen, which is closed, and many of the Hills Conservation Parks which are closed on days of high fire danger. This is when we most value the linear parks, and particularly those along the Torrens which are well maintained, have areas of shade, and have multiple points of access via public transport.

Adelaide has, compared with most cities, very limited permanent waterfront space. Those of us who don't live near rivers should be allowed to share the beauty that is there – and it isn't as though the spaces are underutilised; any weekend there are families out and about walking, cycling and picnicking. Conversely, the shops and hotels that are in the CBD keep complaining that they haven't enough customers; the City of Adelaide has been working with them with FOMO and other street parties, but doesn't this mean that no more are needed?

If it does appear that there is a need for more accommodation during peak periods or attractions, perhaps the City could advise the outlying hotels – many provide shuttles to airports, there's no reason why they couldn't offer that to Memorial Park for tennis, or to the football stadium, and perhaps Adelaide Metro could assist.

I agree with the Adelaide Parklands Association which has made this statement...

...” reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.”

Thank you for your attention. And by the way, congratulations on moving the Formula 500

Yours faithfully

Diane Campbell



Diane Griffin

I reject the Government's so-called "vision" for the Adelaide Park Lands.

Open Green Public Spaces do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage.

DIANE GRIFFIN

VALLEY VIEW



Dinali Devasagayam

To whom it may concern

I am writing to express my strong opposition to the proposed Riverbank Precinct Code Amendment. The Parklands are an iconic part of the City of Adelaide and provide numerous, irreplaceable benefits in its state of open green space. The Parklands are a beautiful, public open space that all residents and visitors to the city have access to. They also provide vital ecological functions including cooling of city and air filtration.

Too much of the Parklands have already been siphoned off from the public domain by development in the past decades. It is time now to take a stance and ensure this future generations continue to benefit from the wisdom of the early city planners.

Yours sincerely

Ms Dinali Devasagayam, Masters Env Mgt & Sust.

Don Murchison

To Whom it concerns,

I reject 100% the re-zoning of any part of the Adelaide Park Lands.

The Parklands are an essential part of the history and environment that is Adelaide.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

The Parklands should be zoned for permanent status of 'non development', so as to prevent any infringement on the land that has been set aside, as exists now.

Yours Sincerely,

Don Murchison

Don Richards

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Don

Family name: Richards

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: I am opposed to any changes to the zoning of the areas NORTH of the River Torrens.

Attachment: No file uploaded

Attachment 2: No file uploaded

Attachment 3: No file uploaded

Attachment 4: No file uploaded

Attachment 5: No file uploaded

sent to proponent email: plansasubmissions@sa.gov.au

Dr Christina Jarvis

To Whom It May Concern

I reject the re-zoning of any part of the Adelaide Park Lands. To do so will be a 'death by a thousand cuts' for this global treasure.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

With climate change upon us and cities becoming ever more crowded, open and green space has never been more important. Please place our health and that of the environment over the demands of a few wealthy investors and leave our parklands alone!

Christina Jarvis

Dr. Christina H. Jarvis

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Unley BC

UNLEY SA 5061

AUSTRALIA

████████████████████

Dr David Faber

Dear SA Gov: Submission as dated Warmest regards Dr David Faber

From: Susan & Jeff [REDACTED] >
Sent: Friday, 22 October 2021 6:22 PM
To: 'Dr David Faber' [REDACTED] >
Subject: RE: Riverside precinct & Planning code

Hi David

Thank you for copying us in on your email. As we happen to be knee-deep in SWCCA's submission on this topic at the moment, it was a welcome surprise to see your email and to see your thoughts – we have been feeling a bit overwhelmed by this one, and your email has spurred us on.

You might like to send your response to the State Government's Your Say system – the consultation will remain open until 5pm on Wednesday 27 October. You can email your submission to: plansasubmissions@sa.gov.au. The more people who object to this the better!

Kind regards

Susan

Susan Collins

Chair

South West City Community Association Inc.

Telephone: [REDACTED]

Direct [REDACTED]

General email: [REDACTED]

From: Dr David Faber <[REDACTED]>
Sent: Friday, October 22, 2021 4:28 PM
To: 'Keiran Snape' <[REDACTED]>; 'Helen Donovan' [REDACTED] >;
[REDACTED]
Cc: 'Susan & Jeff' <[REDACTED]>; 'Marjon Martin' [REDACTED]
Subject: Riverside precinct & Planning code

Dear Councilors: I would like to refer my views on the above to you directly, rather than through the Yoursay portal, which like some older constituents, I do not find sufficiently user friendly (I was of the generation who took a degree with a fountain pen, before computers were readily available, & have only managed to keep up relatively speaking).

I do not think the Code has benefitted from sufficient community consultation to be implemented as is, despite the fact that the administration will probably already be sick & tired of administering its own IT focused, limited stakeholder processes.

This was a problem during the Dardenelles Cenotaph controversy, which largely consisted of disagreement about process, because Council thought consultation consisted only of sounding out major stakeholders, excluding historians & the community of City South West, which was attached to the monument it had hosted in Park 21 West for over a century. I fear this matter suffers from an analogous process.

I would suggest that Council & its administration overhaul their consultation model, & test it on this matter.

I support the Kurna concerns bruited in *The Advertiser* today. The historical sites therein referred to need to be properly & fully charted with that community & its archeological & historical associates. I hope the response reported amounts to more than belated good intentions. This matter cannot be responsibly rushed through

Warmest regards Dr David Faber 

Dr Elizabeth Hotham & Mr Neil Hotham

Dear Ms Chapman (Attorney General and Minister for Planning and Local Government)

My husband and I came to Adelaide from interstate in the 70s, attracted by many aspects of Adelaide and South Australia, but especially the unique and amazing Park Lands.

It is almost impossible to believe that, all these years later, we are still needing to write in support of their value and the need for their conservation.

The Adelaide City Council is to be congratulated for many recent initiatives to enhance sections of the Park Lands, although Council's dedication to the Park Lands has, unfortunately, faltered on a number of occasions. (A building here, a road there...) However, I note that the Lord Mayor is not in favour of this rezoning proposal.

Many commercial/retail sections of the CBD and North Adelaide are languishing with empty tenancies and struggling small businesses. Therefore, it is impossible to understand a proposal to allow yet more retail and hospitality venues to be established so close by.

Further, the Park Lands are not simply "empty spaces" to be thrown open to developers to construct another series of buildings., whether high or low rise.

As the old song goes: "You don't know what you got 'til it's gone". However, many of us do know what we have and are distressed that short-sighted actions by governments can destroy the amazing legacy that is the Adelaide Park Lands.

In addition, given that the state is on the brink of an explosion of COVID cases, and we already face significant ambulance 'ramping', we are appalled that a reported \$700million is earmarked for a new netball stadium on land which could arguably be remediated and returned to Park Lands.

I trust that you - and your colleagues - will give urgent consideration to our views and those of many others justifiably concerned about our Park Lands heritage.

Regards

(Dr) Elizabeth Hotham & Mr Neil Hotham

████████████████████

Adelaide

SA 5000

Dr Gillian Dooley (History Council of SA)

To whom it may concern,

Attached is a submission from the History Council of SA regarding the rezoning of the Riverbank Precinct.

Yours faithfully,

Gillian Dooley,

President, History Council of SA

Dr Gillian Dooley
Honorary Senior Research Fellow, English

Chair, Music Advisory Committee

Flinders University
South Australia

President, History Council of SA

Phone: [REDACTED] (mob)

Email: gillian.dooley@flinders.edu.au

Website: <http://www.flinders.edu.au/people/gillian.dooley>

Writers in Conversation: <https://journals.flinders.edu.au/index.php/wic/>

Jane Austen's Music site: <https://sites.google.com/site/janeaustensmusic/home>

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OPEN LETTER TO THE PREMIER:
OBJECTION TO PROPOSED REZONING OF ADELAIDE CITY PARK LANDS

26 October 2021

The Honourable Steven Marshall MP
Premier of South Australia
Parliament House
North Terrace
Adelaide, SA, 5000

Dear Premier,

The History Council of South Australia (HCSA) is an independent, non-government body who membership is comprised of individual members, cultural, academic and government institutions, local libraries, museums and historical societies. On behalf of our members, the HCSA opposes the South Australian Government's proposal to change the zoning of north/west sections of the City of Adelaide Park Lands for uses other than open space and community recreational facilities.

HISTORY AND HERITAGE: The Adelaide Park Lands are an integral component of our state's heritage. In his 1837 survey, Colonel William Light included 2,300 acres (930 hectares) of land surrounding the city to be reserved from sale and dedicated as parklands for the use and recreation of the citizens. The exception was 9 blocks of land Light specified for use for government buildings and facilities (including government house, a botanic garden, a hospital and a cemetery).

Light's visionary plan is regarded throughout Australia and the world as a masterwork of urban design. It ensured Adelaide had the world's first public park (10 years ahead of the next public park in Merseyside, England). Light's model is recognised by town planners and historians as a major influence on the Garden City planning movement, one of the most important western urban planning initiatives in history.

The Adelaide Park Lands received National Heritage Listing in 2008, and in December 2018, the State Heritage Council recommended them to the Minister for Planning for State Heritage Listing (although progress has been disappointingly slow). Unfortunately, throughout the history of the city, there has been an ongoing battle to protect the Park Lands from built development.

THE PROPOSED REZONING: In 2021, 760 hectares of Parklands – about 80% – are under the custodianship of the City of Adelaide Council and are mostly open space, with the South Australia Government the custodian of the remaining 20% (comprising government buildings and facilities and the (mostly open space) Adelaide Botanic Gardens).

The highly controversial Planning and Design Code, introduced this year (2021), designates the 80% as the Adelaide Park Lands Zone. The remaining 20% of the Parklands is divided into different Zones and Subzones with variously named Precincts designated by the Government.

The HCSA objects to the Government's proposal to acquire the below listed land for Government purposes, and to rezone it for uses other than open space and community recreational facilities.

The Park Lands proposed for acquisition for Government purposes (stated in Attachment A of the consultation paper) include:

- rezoning land at Port Road, North Terrace, War Memorial Drive and Gaol Road from

Adelaide Park Lands Zone to City Riverbank Zone and apply the Health Subzone. The intention being to extend the designated medical precinct to Parklands on which the old gaol, police barracks and historical olive grove sit to service the proposed Women's and Children's Hospital. The Government proposes converting the State heritage listed Old Adelaide Gaol and Police Barracks into biomedical and ancillary health services.

- Rezoning land at Montefiore Road, North Terrace and Festival Drive from Adelaide Park Lands Zone to City Riverbank Zone and apply the Entertainment Subzone. The intention being to extend the designated entertainment precinct to the west of the Morphett Street bridge and claim this section of the Parklands for a sports arena.
- Rezoning land around Frome Road from Adelaide Park Lands Zone to City Riverbank Zone and apply the Innovation Subzone. The intention being to extend the designated innovation precinct by rezoning a small portion of the Parkland adjacent to the Botanic High School.
- To apply the new Riverbank Subzone to land around War Memorial Drive, Victoria Drive, King William Road, Montefiore Road and Park Terrace which is currently in the Adelaide Park Lands Zone, the intention being to provide opportunities for a riverbank or waterfront precinct, and to sublet sub-let the riverbank to commercial activities, such as retail and hospitality, and allow for low-rise buildings (up to 2 stories) on the riverbank to house these commercial activities.

The HCSA strongly objects to each of these proposals that will decrease the area of the green belt encompassing the city.

We argue that, as a hallmark of the city's original design, which has maintained elements of its historical layout for more than 170 years, the Adelaide Park Lands are of great historical and heritage significance. They continue to be a unique and highly valued aspect of our wonderful city and are important to the identity of South Australia. We also suggest that, as there is little Kaurna land in the Adelaide area that has not been built over or bitumenised, it is disrespectful to build over the few remaining natural areas. In addition, global warming is increasingly recognised as an eminent threat to city dwellers' lifestyles; planners recognise that Green areas decrease the temperature of cities and assist in the retention of water and should be protected and expanded.

The HCSA draws attention to the health, environmental and economic benefits that green, treed and community accessible spaces provide. They also form a major aspect of Adelaide's unique character which appeals not only to residents but to visitors from interstate and overseas.

Accordingly, the HCSA asks the Government to reconsider this proposed rezoning of the Parklands.

Yours faithfully,

Dr Gillian Dooley
President,
History Council of South Australia

Dr Ingrid Wangel

I strongly object to the re-zoning of any part of the (national heritage listed) Adelaide Park Lands.

Parks are supposed to be green, open, public.

Parks are supposed to have plants, trees, water, fauna. Not tons of permanent concrete structures.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands enclosing and protecting both the City and North Adelaide is a wonder found in no other city in the world.

The nature is a tourist attraction. Not buildings, degrading the peaceful park aspect.

It should be valued as such, not sacrificed as if it were merely vacant development sites "for free".

Dr Ingrid Wangel

Submission re Adelaide Park Lands rezoning

Dr Ingrid Wangel

I strongly object to the re-zoning of any part of the Adelaide Park Lands. This is a grab for public land to be turned over to private developers. Once built on, destroyed. My public land. Our public land. A priceless resource. Not for sale.

Parks are supposed to be green, open, public.

Parks are supposed to have plants, trees, water, fauna. Not tons of concrete poured over them. Not permanent buildings.

Our government is supposed to protect our national heritage listed Park Lands. Not abuse and destroy them. Why do we have to keep having this farcical grab for Park Lands land?

My friends overseas ask me why our (federal) government is a climate change denier. This is the perception the world has of us in Australia.

They roll their eyes at the thought of building in National Parks.

The SA State Liberal government is certainly seen as contributing to climate disaster with these rezoning (aka building) plans for acres of the Park Lands.

Pouring tons of concrete onto heritage Park Lands is never a good look at election time. Bulldozing mature native habitat to replace it with “entertainment” centres, high rise buildings, bars, nightclubs, hospitals, carparks is a plot belonging in a dystopian film plot.

There has already been too much building intrusion along the Riverbank area.

It also makes no economic sense, taking business away from struggling existing retailers in the CBD.

The premier speaks of Helen Mayo Park as ‘a degraded park’ and that putting a large building there gives an amenity to the public. A fraction of the money already spent on this building proposal would be ample to re green the existing old carpark area intruding into the Parklands.

The government employs “Yes Minister speak”, calling a proposed hospital carpark “a travel hub” (mooted for the olive grove behind the old gaol where the beloved police horses graze). Re-naming acres of the Parklands into “precincts”, to allow building on them.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands enclosing and protecting both the City and North Adelaide is a wonder found in no other city in the world. The nature is a tourist attraction. Not buildings, degrading the peaceful park aspect.

It should be valued as such, not sacrificed as if it were merely vacant development sites "for free".

Dr Iris Iwanicki

I reject the re-zoning of any part of the Adelaide Park Lands.

The sub-zones proposed will result in developments that are out of kilter with protecting park land space for future generations and seriously detract from the National Estate listing of the Adelaide Park Lands.

Moreover, the public will get no notification or say in the proposed developments.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours sincerely,

Dr iris Iwanicki, PhD, Life Fellow RPIA (retired)

Level 2 accreditation, M.ICOMOS

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Dr Iris Iwanicki (Community Alliance SA Inc)

20TH October 2021

SUBMISSION BY CASA

RE:

Consultation: Riverbank Precinct Code Amendment

Period: 15 September to 27 October 2021

Feedback to:

https://plan.sa.gov.au/have_your_say/general_consultations/public_feedback_on_initiated_code_amendment?aid=Riverbank_Precinct_Code_Amendment

INTRODUCTION

The Community Alliance SA Inc. (CASA) was formed as an umbrella organisation for 25 resident action groups in South Australia. CASA was formed in 2011 following a number of controversial Ministerial Development Plan Amendments (DPAs) that caused widespread community concern. We advocate for our member groups, including lobbying for reform of government, planning and related legislation, and for genuine community engagement.

Ten years on, we now represent 30 resident groups and growing. Ten years on, our economy, environment and communities are facing significant challenges that were unknown back in 2011 or 2016 when the Planning Development and Infrastructure Act was promulgated. SA now has a state wide planning system to replace local council based Development Plans. CASA's aims include to advocate for a sustainable and democratically based planning system, increase accountability and community confidence in decision making; defending the community's rights to informed participation in their system of government, and **protecting and safeguarding our heritage for future generations**. Our overall aim is to 'put people back into Government and Planning'.

Please find our submission as follows:

CONSULTATION FEEDBACK

- The consultation relating to matters contained in the document Draft for consultation, Riverbank Precinct Code Amendment, Chief Executive, Attorney General's Department (approved 10/9/21) does not comply with the Community Engagement Charter as prescribed under the provisions of the Planning, Development and Infrastructure Act because the engagement is not well informed or sufficiently transparent.
- The consultation assumes high-level professional planning knowledge, which is unreasonable and has potential to alienate the 'broader South Australian

community’ and thus discourages some respondents from participating. Many members of the public have contacted CASA bewildered by the method of access to information on line, and confused by the complexity of the information.

- The general public, despite the substantial documentation provided, find the portal access to the details difficult. There is also inability to comprehend that PlanSA’s fundamental proposals seek to replace existing desired planning outcomes for the Adelaide Park Lands Zone in the current Planning and Design Code with alternative desired planning outcomes for existing and re-zoned land on which major built form development is proposed. The content also disregards previous planning and concept reports and does not clarify on what basis the authority to propose changes relies.
- Although this consultation purports to encourage feedback that has potential to influence the outcome, in reality the scope is tightly restricted by PlanSA. Moreover, this restricted scope is not prominently highlighted.
- The ‘consultation’ is, in effect, an ‘information-only’ notification to the SA public that purports to be a ‘consultation’. This is a disingenuous, non-respectful process.
- It is evident that this code revision proposal is at a final draft stage, ready to quickly implement, and the suggestion that it is merely ‘a work in progress’ with no schedule indicates that the consultation is not genuine. The public consultation (‘engagement’) did not occur early enough to allow for feedback that might genuinely influence the proposed planning policy. CASA has issue with the fact that ‘stakeholders’ do not include a concurrent series of public information sessions when pre-consultation workshops were occurring.
- Insufficient information is presented about the content of the strategic reviews preceding this proposal, such as the Renewal SA and State Planning Commission investigations.

WHY DO WE HAVE PARK LANDS?

CASA rejects the Code Amendment in its lack of recognition of the cultural and historical relevance in retaining Park Lands for public use. This move to rezone riverbank areas as subzones is rejected. The subzones if adopted will take precedence over the underlying Adelaide Park Lands Zone’s Desired Outcomes. The Code reflects an appalling attitude and approach by a state government entrusted with the custodianship of the protection of Adelaide Park Lands for our present and future generations, including all those within the community sharing a connection and public interest within its boundaries.

As stated by historian Patricia Sumerling in her introduction to ‘The Adelaide Park Lands- a social history;

‘the Adelaide Park Lands are unique in Australia, with no known counterparts elsewhere in the world. They date from 1837, when the new town of Adelaide and its dormitory of North Adelaide - completely encircled by Park Lands, as Colonel William

Light, the first Surveyor General intended – were surveyed. The uniqueness of the Adelaide Park Lands was recognised on 7 November 2008 when they received Australia’s highest heritage honour by being included in the National Heritage List. The Park Lands surround the city in a green swathe of parks, gardens, ovals and sportsgrounds of approximately 931 hectares (2300 acres) with some acres of around half a kilometre wide swaddling the two parts of the city like a figure of eight. In all the city and the Park Lands comprise areas measuring 13 square kilometres (five square miles). Like a buffer one, the Park Lands separate the approximately 422 hectares (1042 acres) that make up the city from the sprawling metropolitan area...

Michael Williams, author of *The Making of the South Australian Landscape*, claimed the significance of the Adelaide Plan lies not only in its unique character and formalisation of functional zones, but also in its use as a model for over two hundred towns and villages in Australia, and for several towns larger than these in New Zealand.’¹

Over time the area of the Park Lands has reduced from 931 hectares to around 233 hectares with government and institutional buildings, rail terminal and conferences centres constructed along North Terrace. One main aspect of this process of civic change for buildings along North Terrace has been the retention of open spaces in a linear manner both north and south of the River Torrens.

OVERVIEW OF DRAFT CODE AMENDMENT

The proposed rezoning will involve up to 70 hectares of Park Lands space. It includes

1. Four sub-zones vaguely titled generically with little detailed explanation.
2. Significant change in desired land uses, allowing a wide range of developments not currently contemplated by the Planning and Design Code. New proposed land uses include land division, light industry, accommodation, shops, high-rise buildings and other new land uses inconsistent with existing land uses contemplated by the Adelaide Park Lands Zone. These include:
 - Small scale buildings on Pinky’s Flat (Tarntanya Warna Park (Park 26).
 - Large multi- storey buildings or residential apartment buildings.(City Riverbank)
 - A large indoor Riverbank Arena in Helen Mayo Park (Park 27).
 - A multi-storey car park in Kate Cocks site (also Park 27)
 - A second hospital at the western end of the Royal Adelaide Hospital site which the hospital’s Master Plan reserves as open space to strengthen the continuity of the Park Lands.
 - The transfer of Park Land areas into the state government’s proposed new City Riverbank Zone will remove policies which protect the open, accessible landscaped character of the Adelaide Park Lands.
3. As the City Riverbank Zone envisages high-rise buildings, the transfer is totally at odds with the Adelaide Park Lands principles within the Code.

¹ Sumerling, P (2003) *The Adelaide Park Lands, a social history*. Wakefield Press, Adelaide SA p.ix-x

THE PROPOSED AMENDMENT IS CONTRARY TO THE CURRENT PLANNING AND DESIGN CODE PROVISIONS FOR THE ADELAIDE PARK LANDS ZONE.

The Desired Outcomes in the Code seek:

A unique publicly accessible and well connected open space system, including the formal city squares, that creates a distinctive landscaped park setting for the City of Adelaide

A range of passive and active recreational activities with a high level of amenity, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of temporary events, such as festivals, concerts and sporting events.

Comment: the above wording refers to the open space system, providing a range of passive and active recreational activities. The proposed land uses are not supportable, given that the current park lands are able to revert to a well connect dope n space system that is unique and publicly accessible.

STRUCTURE OF THE AMENDMENT

The proposed sub-zones : The intent is that these sub-zones will negate current Planning and Design Code provisions for the Adelaide Park Lands Zone, and include

1. Riverbank Sub-zone.

The Code Amendment proposes:

- Rezoning land west of the Royal Adelaide Hospital from the Adelaide Park Lands Zone to City Riverbank Zone (Health Subzone) to support the development of the new Women's and Children's Hospital.
- Rezoning land west of Montefiore Rd from Adelaide Park Lands Zone to City Riverbank Zone (Entertainment Subzone) and a portion of land already in City Riverbank Zone from Health Subzone to Entertainment Subzone. This will support the development of entertainment- related uses, such as an arena.
- Rezoning land near and on which the Adelaide Botanic High School currently sits, from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone), to better reflect current use.
- Applying a new Riverbank Subzone in the Adelaide Park Lands Zone to the southern and northern side of the River Torrens in the location between Kintore Avenue and the Torrens Weir to accommodate appropriate small-scale development such as cafes and shops (both on-water and off-water) that contributes to the activation of the riverfront, in a way that protects the open landscaped character and heritage values of Elder Park.
- Policy changes to support connections and linkages throughout the precinct.
- Policy changes to support development of high quality and amenity.

- Introduction of a wide range of commercial uses, including high rise buildings, land division, shops, serviced apartments, licensed premises, community facilities, tourism accommodation.
- Attachment C is confusing to the layperson.

On closer examination, the extent and range of introduced developments are detrimental and fatal to the retention of what is recognised as a rare and beautiful town plan with its surrounding open woodland, ovals, sports fields and more formal gardens. The land uses and developments envisaged above are clearly at odds with the Objectives of the Park Lands Zone.

Specifically:

1. Riverbank subzone

The Riverbank sub-zone is already activated, with three cafes and two restaurants in the Precinct. The two restaurants overlook River Torrens/Karrawirra Pari. Pinky Flat hosts many large and small ephemeral events held in Elder Park, Pinky Flat itself, Barr Smith Walk, under existing planning conditions and revert to open park land areas when not in use. More of the same will not reduce the open landscaped character and heritage values of Elder Park.

2. Health Sub-zone.

This area includes the remaining Park Lands space between and on Kate Cocks Park (Park 27) and the Thebarton Police Barracks -west of the railyards to allow for a commercial multi-level car park for the new Women and Childrens Hospital. A height of up to 15 building levels is proposed but not detailed in this area. No additional guidance is provided regarding the transition in height from North Terrace developments on the river side of Terrace towards the western Park Lands. (The CWH Master Plan provides graphic images of the scale and setting of the proposed hospital and carparking Transit Hub but is not referenced in the Code Amendment.) For members of the public not able to access information sessions during business hours, there is insufficient information regarding the visual impact (and specific location) of the area taken up by access and parking, and vague references to the potential use of the two state listed heritage places.

Comment : The setting of the state-listed heritage Adelaide Gaol and the Thebarton Police Barracks should not be compromised by the proposed car parking 'transit hub' and its access ways. The area should be developed as a park setting retaining historic olive groves, a very tough and long lasting Mediterranean species and part of pioneer olive harvesting and food production. Park Land areas north and west of this sub-zone should be retained for passive and active recreation, and ephemeral entertainment events.

4. Entertainment Sub-zone.

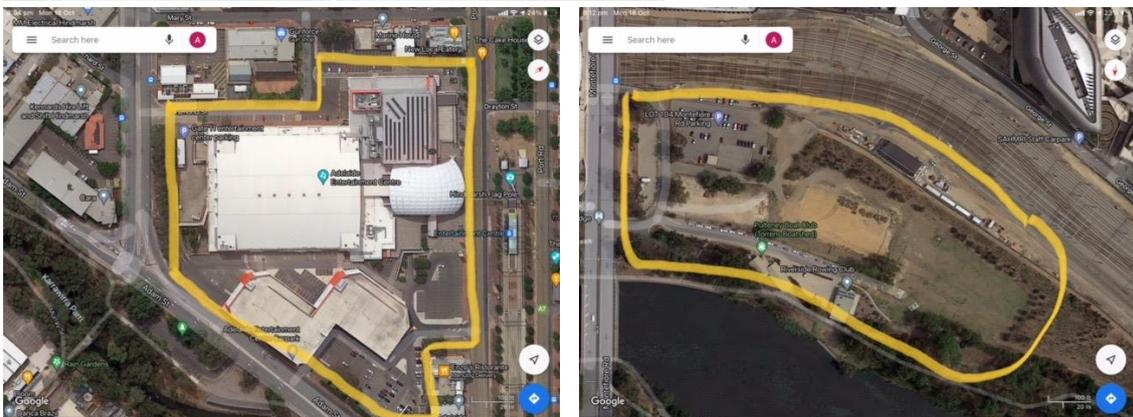
This sub-zone provides a height guidance of 20 building levels providing a 'transition in scale towards the river'. This sub-zone provides a height guidance of 20 building levels providing a

‘transition in scale towards the river’. However, the proposed Adelaide Riverbank Arena illustration consultation material provides no such transition in scale down to the river on Helen Mayo Park (Park 27). Nor does the Code Amendment detail the fact that the Entertainment Centre, which is west of the Park Lands and well accessed by rail, tram and train links on Port Road ‘replacement’ may possibly result in demolition and housing development if the Arena goes ahead at the cost of \$660-700 million cost. There is no cost-benefit analysis of upgrading the existing Entertainment Centre versus the ‘Arena’ –essential background information if the community can make informed comment, being relevant information on which to respond with their views of this Code amendment. This is a very poor trade-off and results in significant increase in the demand for parking close to a Park Lands venue. The proposed Arena is completely contrary to the intent of the Adelaide Park Lands Act, 2005 (refer to page 8).

The affected area currently provides a narrow stretch of treed parklands created from disused rail lands along the edge of the river. The continuity of the walkway through the existing trees on the site of the proposed , which includes a regular Kaurna heritage interpretation tour to access the western area south of the weir, is essential to show respect for Kaurna cultural events, and to provide a public walkway to the western park lands. It appears the pedestrian link’s amenity through riverside walk would be overcome by the bulk and scale development of the proposed stadium. Comments regarding the contamination of the railway site ignores the fact that Adelaide has landscape architects who have won numerous awards in beautifying public spaces, and remediation through design is quite possible.



[Announced in March 2021](#), the Adelaide Riverbank Arena would cost \$700 million to construct and would replace the ageing Adelaide Entertainment Centre.



Note: the image on the RHS indicates very little walkway space and the removal of mature trees worthy of retention and improvement.

However, the proposed new Arena content in the Code Amendment on exhibition provides no such transition in scale down to the river on Helen Mayo Park (Park 27). The park currently provides a narrow stretch of green parklands created from disused rail lands along the edge of the river.

The continuity of this naturally landscaped walking path, which is included in an educational and regular Kaurna heritage interpretation tour to the western area south of the weir, is essential to show respect for Kaurna cultural events, and to provide a public walkway to the western park lands. It appears the pedestrian link's amenity through riverside walk would be compromised by the siting of this large building almost on top of the lake, given its indicative bulk, height and scale.

Comment: Building the stadium in the location proposed is not supported for 2 reasons: It is further alienation of Park Land space and the overall costs are not provided. This is the sort of discussion that 'stakeholders' presumably have in rezoning and identifying suitable policies. It is also the type of information for genuine consultation with the community in the development of such policies.

3. Innovation Sub-zone.

Proposed:

The Code Amendment provides an opportunity for the new school and its curtilage to be better integrated with the nearby innovation precinct located at Lot Fourteen by being rezoned to City Riverbank Zone, Innovation Subzone consistent with this precinct.

The existing important open space link 'Frome Park' (located to the immediate south of the high school) between Frome Road and the Adelaide Botanic Gardens will be maintained through policy and identification on an updated concept plan that integrates the site with Lot Fourteen.

Notes: the area of the High School appears to have doubled, with no clear land use indicated but a number of land uses are proposed – more building replacing open space.

There are no details of an updated concept plan, nor any clear description of Desired Outcomes. Consequently there is insufficient information to provide informed comment and no indication that submissions will be considered in line with stakeholders' contributions to influence policy.

The overall proposed Code amendment displays an ignorance of the traditional interests and connection with the riverbank area.

Frome Park/Nellie Raaminyemmerin between the new Botanic High School and the Lot 14 site, was reclaimed as Park Lands from an old car park. This area was remediated by the Adelaide City Council in the late 1990s and is owned by the ACC. The extension of the site area is proposed but is a highly significant site for the Kaurna People. The extension is strongly opposed for the following reasons:

1. This area is extensively contaminated and had to undergo remediation by burial and capping in order to meet the required standard applying to open space.

2. Under current regulations the site cannot be disturbed unless the whole of the contaminated material (which is about 1.5 M deep across most of the site) is removed to a regulated disposal site.
3. Additionally, the site contains a fully authenticated and documented Kaurna Aboriginal burial site; the human remains have been retained in place and capped. That has been recorded and protected, listed on the Register of Aboriginal Sites and Objects, Aboriginal Heritage Act 1988. Again, it cannot be disturbed.
4. Frome Park / Nellie Raminyemmerin allows the only access to the west side of the Botanic Garden, is used for WOMADELAIDE and other events.
5. No reason has been established for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Sub-zone).
6. The rezoning puts Frome Park at risk as a transition from open green space to an ancillary area for Lot Fourteen and Botanic High School.

CONCLUSION

CASA does not support the rationale for the Code Amendment, being contrary to the public interest and that the Minister for Planning reject this amendment because:

1. The Park Lands provide green and open space which is essential, for the people living in the city's high-density accommodation.
2. Considering the latest IPCC's predictions and warnings, the state government including Renewal SA, the State Planning Commission and the Liberal Cabinet is urged to heed the increased acceleration of Climate Change impacts on increasing temperatures, catastrophic weather events and public health.
3. Moreover, a whole of government approach is recommended to respond urgently to the public need to protect and value open space for its intrinsic benefits to biodiversity, human mental and physical well being.
4. World-best cities value open space for cultural and recreational purposes. New York's Central Park, Vienna's Ringstrasse Park, Paris's Tuilleries, London's Hyde Park, Hampstead Heath and Regent Park are valued for their aesthetic and environmental benefits of green and open space. Adelaide's Park Lands are unique and need to be protected for the same reasons.
5. The proposals are serious at variance with the 7 statutory principles of the **Adelaide Park Lands Act 2005**. (Note that the Act was prepared after the Adelaide Park Lands were under threat from development including the Next generation Fitness Centre at the Adelaide Oval and the National Wine Centre. The latter development was pitched as a crucial building ensuring South Australia's wine industry. The economic benefit was not forthcoming - and failed to bring the business and activation expected.)
6. The above Act is still in force and as relevant as ever. The 7 statutory principles can be summarised as:
 - Honouring the general intention of Colonel Light's original 1837 Plan of Adelaide;
 - Providing open space for the benefit of the people of South Australia, and to be available for their use and enjoyment;

- the Park Lands to reflect and support a diverse range of environmental, cultural, recreational and social values and activities;
- Provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City;
- Contribute to the natural heritage and improve the biodiversity and sustainability of the Adelaide Plains;
- To be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government;
- To reflect the interests of the South Australian community in maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

The Code does not address, either adequately or convincingly, the above principles.

9. It is relevant to note our Park Lands are also an intrinsic aspect of Adelaide's city design, recognised by the National Heritage List. Historically, the park lands were paid for by an early Governor out of his personal income to ensure that ownership of the park lands was linked to public access for passive and active leisure. This intent is reflected in the fact that historic Crown leases enabling buildings (such as the weather station at the corner of West Terrace and the Adelaide High School) required the removal of buildings to restore the open nature and extent of the Park Lands when the use of the building ceased to exist. Furthermore, the value of the National Heritage listing will not be served by the inclusion of uses which are not consistent with the general character of the park lands, or create an imbalance of uses which may affect the overall landscape character and the National Heritage values.

In our opinion that the state government's proposed Code amendment displays a new low in unconscionable and dumb planning - on a par with the expansion of Mount Barker and Buckland Park on the Gawler River floodplain.

Furthermore, once the area is rezoned, the Code amendment material provided does not clearly communicate to people making comment that there is and will be no provision for formal public notification of proposed developments in the public interest if rezoning occurs. Currently Category 1 (no notification) prevails for all significant projects within the Park Lands. This is perverse with respect to democratic process, given the fact that the area is of significant public interest and civic pride.

In conclusion, community engagement undertaken after policies have been consulted and drafted with stakeholders is not consistent with the intent of the PDI Act's Community Engagement Charter. This is intended to engage fully on policy formulation, not merely allow comment on height, land use and functions on outcomes that appear to have already been decided.

We ask the Minister to require a thoroughly consulted, well informed and progressive Master Plan, consistent with the social, historic, tourism and biodiversity values before endorsing any Code amendment, given the current circumstances of climate change and the need to protect the city's heritage for posterity.

It is hoped the recipients of this submission will consider the concerns expressed, and look forward to the Minister's response in due course.

Yours sincerely

Dr Iris Iwanicki
President
Community Alliance SA Inc.
M: [REDACTED]
sa.community.alliance@gmail.com

Dr Jennifer Gardner OAM

My Submission is attached.

Dr Jennifer Gardner OAM

[REDACTED]

[REDACTED]

Dr Jennifer Gardner OAM

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

To: Code Amendment Team - Attorney-General's Department

Subject: Proposed Amendment to the Planning and Design Code

I strongly object to the re-zoning of any part of the Adelaide Park Lands.

The Park Lands belong to the people of South Australia, and must remain **open, green and public**. There should be no private commercial development in our Park Lands.

The Government is custodian of the Park Lands. The proposed Amendment to the Planning and Design Code which alienates 70 hectares of the Park Lands is a breach of trust.

Adelaide is unique as a city built within a park and as such is worthy of World Heritage listing. The Park Lands should be valued as such, not sacrificed as if they were merely vacant development sites.

The proposed alienation of another 70 hectares of our Park Lands puts at risk our bids for World Heritage listing and National Park City status.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the open green public areas of Park Lands - accelerating the current loss of 25% this priceless resource.

The Park Lands contribute to Adelaide being considered one of the most 'liveable' cities of the world. World Heritage Listing and National Park City status would promote tourism.

As green space the Park Lands contribute many environmental benefits. The Park Lands purify the air, counter the heat island effect of buildings and hard stand, and provide a much-needed environment for passive recreation and connection to nature which are so important for human health and wellbeing.

It is incorrect to assert that the Park Lands need to be 'activated' by built structures and commercial development because few people use them. On the contrary, Adelaide City Council estimated that there were 8.87 'visitations' to the Park Lands in 2014. My observation is that there would be many

more visitations now with many more residential buildings in the CBD. I walk in the Park Lands frequently. The Riverbank, and the Park Lands more widely, are always being used by walkers, cyclists, yoga and Tai Chi groups, picnickers, sports teams, garden lovers, children in beautifully landscaped playgrounds, weddings, naturalists, dog owners and more. All these users enjoy free, unrestricted access.

In addition the Park Lands as green, open, public space are host year-round to an abundance of cultural events such as WOMADelaide, Festival Fringe, Illuminate Adelaide, the Lantern Trail, guided walks and other community events. These events enrich city living.

I urge the Government to:

1. Reject the proposed Amendment to the Planning and Design Code
2. Respect the principles under the Park Lands Act
3. Protect, restore, beautify and maintain our precious Park Lands as green, open and public.

Respectfully,

Dr Margaret Furness

The Parklands contribute substantially to Adelaide's standing as one of the world's most livable cities. To put buildings up to 20 storeys high on the banks of the Torrens would be grossly insensitive, and depreciate the amenity of the area.

The opinion of the Kurna people must be sought and respected.

The Parklands belong to the people of South Australia. Democracy is government of the people, by the people, for the people. To allow commercial development on any part of the Parklands is unacceptable.

Dr Margaret Furness



Dr Meredith Kaesehagen

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes, then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. During the current Covid 19 Pandemic, these green spaces have become more important than ever, both for exercise and also for their calming effect, when people are so anxious at times of great uncertainty.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades. The current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Dr Meredith Kaesehagen

████████████████████

████████████████████

Dr Michael Llewellyn Smith AM

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Dr Michael

Family name: LlewellynSmith AM

Organisation: Llewellyns International Pty Ltd

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Submission attached.

Attachment: Park_Lands_submission.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 39.0 KB

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Attachment 5: No file uploaded

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21 October 2021

Code Amendment Team
Planning and Land Use Services Division
Attorney-**General's Department**
GPO Box1815
Adelaide SA 5001

Ref : Riverbank Precinct Code Amendment

I write as the former City Planner and Town Clerk/CEO of Adelaide and more recently a Councillor and Deputy (Acting) Lord Mayor of the City. I am also the author of *"Behind the scenes : the politics of planning Adelaide"* published by The University of Adelaide Press in 2012.

In March this year the new State-wide Planning and Design Code came into effect. It is under the provisions of this Code that the State Government is now proposing to increase the City Riverbank Zone by rezoning land from the Adelaide Park Lands Zone.

I do not propose to comment in detail on this broad-brush approach but in my opinion the Minister, with advice from the State Planning Commission, should determine that this Code Amendment SHOULD NOT PROCEED.

To fully appreciate the impact of the Riverbank Precinct Code Amendment, it is important to understand the background to the Park Lands in terms of the historical context of City/State relations.

When driving you need to look forward to see where you are going. But it is very wise to look regularly in the rear view mirror to see where you have come from. In this submission I am providing a history of the Park Lands in the context of City/State relations as necessary background for the consideration of the proposed Code Amendment. While there are a few examples of cooperation, as described below, for the return of alienated Park Lands to public use, **the overwhelming theme is that the State Government has seen the Park Lands as 'free' land to be developed** and excised from the care and control of the Adelaide City Council. This approach must stop. It is not acceptable to the very many South Australians who value the Park Lands as a highly desirable feature of their State capital city. What other areas of Park Lands are at risk of being alienated if this proceeds?

I would suggest that joint City/State Capital City Committee should work with the Adelaide Park Lands Authority to consider what areas of alienated Park Lands could be returned for public use. Only when some alienated areas have been returned to Park Lands should any Code Amendments be proposed which rezone Park Lands to any other use. Then the State Planning Commission could consider more nuanced and targeted approaches to Code Amendments rather than this broad brush proposed for the City Riverbank Zone.

I would be pleased to clarify any aspects of this submission or provide further information if required.

Yours sincerely,

Michael Llewellyn-Smith

Dr Michael Llewellyn-Smith, AM, KStJ, JP.

PhD (Adelaide), MA (Cantab), MTCP (Sydney), MA (Adelaide), LFAIA, LFPIA, LMLGMA, Dip.Arch (Hons), Dip.LG.

Dr Philip Nicholls

Adelaide's biggest attractions, which distinguish it from the world's concrete jungles, are its wonderful parks and gardens.

Do not prostitute these wonderful assets for the sake of a whole range of anticipated profits.

Dr Philip Nicholls

Dr Sharon Mosler

I wish to make the following comments on the State Government's proposals to amend land use in the Riverbank Precincts:

The Adelaide Park Lands have been an iconic feature of the City of Adelaide since its foundation. In 1837 Surveyor-General Colonel William Light designed the city surrounded by park lands, creating a unique Australian city. As one historian wrote, 'only in Adelaide was there a city plan ... conceived as a noble town design with parklands encircling Adelaide. The separation of the residential suburb, North Adelaide, by the Torrens River made the plan brilliant.'

The proposed 2021 Riverbank Precinct Code amendments are incompatible with the concept of Adelaide's Park Lands espoused by the Adelaide City Council in previous reviews; that is, the Park Lands constitute open space for public recreation. The first City of Adelaide Plan 1976-81 stated that 'the Parklands were to be 'conserved and enhanced exclusively for the relaxation, enjoyment and recreation of the metropolitan population, and the City's workforce, residents and visitors under the Plan'. This concept has been upheld, with amendments, in subsequent Reviews until now.

Health Zone and Entertainment Subzone

It appears the proposal to build a new Women's and Children's Hospital in the Health Zone west of Montfiore Road has been accepted by the community, although staff of the current hospital have expressed disappointment that the number of beds provided is not higher.

However, I object to the proposal to erect a multipurpose Riverbank arena in part of that zone, labeled the Entertainment Subzone, to accommodate cafes and shops.. This proposal will entail the loss of valuable trees at a time when the impacts of climate change and the need for trees to absorb carbon emissions are very high. The construction of an arena in that area will eliminate some of the Park Land and surely would create a demand for parking spaces in the region, against the accepted purposes of the Park Lands. The experience of the stadium in Hindmarsh with inadequate parking places should be an example to avoid this. Moreover, a stadium with noisy spectators would surely impact on the hospitals in the Health Zone.

Riverbank Subzones

I strongly object to the concept of a new Riverbank Subzone in the Adelaide Park Lands Zone to the southern and northern side of the River Torrens between Kintore Avenue and the Torrens Weir 'to accommodate small-scale development such as cafes and shops, on land and water. I fail to understand how such a development could 'protect the open landscaped character and heritage values of Elder Park'. This area of Adelaide was never intended to be a commercial zone, and if it were to attract large numbers of customers on a permanent basis, surely the land would be degraded. On the southern side of the River, there are already several cafes to attract consumers without affecting the landscaped areas.

The northern side of the River Torrens has been used in the past for temporary cafes, during the Adelaide Fringe, which have intruded immensely on residents. Recently, the Royal Croquet Club was granted a lease at Pinky Flat for a café during an Adelaide Fringe. The noise from extremely loud amplified music from that café, which was approved for broadcast

until 3.00am, seriously disturbed the sleep of many North Adelaide residents, who petitioned the Adelaide City Council to limit the hours of amplified music. This practice, often a feature of many cafes, must not reintroduced.

For decades I have ridden my bicycle along the linear park from the Weir to Frome Road. When temporary cafes have been sited on the northern side of the Torrens, patrons have wandered into the linear path, creating a danger to themselves and to me. That path is continuously used by cyclists, joggers and walkers, by people walking their dogs and families pushing small children in strollers. More recently it has been used by riders who have rented scooters near the weir and who use linear park. Inevitably there would be conflicts between them and café patrons on the paths. They may be tolerated during brief Fringe periods but not on a permanent basis. This part of the riverfront is already used extensively by the public.

Many Adelaide residents use these sections of the Park Lands for quiet rest in a natural environment along the riverbank. They may sit on benches or on lawns, observing birds (whose number would surely diminish as a result of the noise from cafes). Many picnic along the riverbank and many more in the Botanic Gardens. They do not need commercial cafes in those areas. At present Jolleys Boathouse and another riverbank café near the King William Street bridge suffice.

The Government must not overlook the fact that the Park Lands along the river contain many Aboriginal burial sites. These sites must be respected and not covered by cafes and entertainment facilities.

These proposals to amend the concept of the Riverbank Zones would destroy the Park Lands, making them parks in name only and turn them into unpleasant experiences for many current users of these open spaces. These are a great asset for the City of Adelaide, and I believe they should not be converted into commercial spaces for the financial gain of governments.

Thank you for your consideration of my submission.

Dr Sharon A Mosler

North Adelaide

██████████

Duncan Crouch

Good morning

I am against the re-zoning of any part of the Adelaide Park Lands, they are what makes Adelaide unique and part of the draw of visitors to our beautiful city.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones and is just the start of the domino effect seen elsewhere.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

As a people we have been poor at protecting our historical buildings and parkland we need to do more to save them for future generations just as Europe has.

Please do not try to build on the parkland as previous government has via back door re zoning.

Thanks Duncan

Dzhoel Drake

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Dzhoel

Family name: Drake

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I think this is a perverse use of land that rezones hectares of publically accessible parks into the hands of private developers and a breach of the cities 184 year history that city planners incorporated into Adelaide all those centuries ago. Tear down paradise all to build yet another parking lot in a city that doesnt even need it, an open air beauty accessible by everyone and for everyone to use just to throw up another Wilsons carpark in a city with ten different parking towers. Who cares about yet another entertainment venue that will just drown out local and smaller acts and pubs in the area either, is it so bad to not care about touring entertainment events the government seems so desperate to always have? What would the Kaurna people say about another slice of nature needlessly destroyed for short term development projects clearly nobody wants! I can argue against this all day.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Edmund Feary

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Edmund

Family name: Feary

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Could not fit comments in the box- see attachment

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sent to proponent email: plansasubmissions@sa.gov.au

City Riverbank Code Amendment- Consultation Response

Edmund Feary

I will split my feedback into sections, addressing the four key changes of the Code Amendment.

General

The general philosophy that I take into this is that development in the Park Lands should be limited to development that facilitates leisure and recreation.

I have one major concern with the application of the public notification provisions of the City Riverbank Zone. This would exempt from notification:

“Any kind of development where the site of the development is not adjacent land to a site (or land) used for residential purposes in a neighbourhood-type zone.”

From my understanding, this would mean that nothing would need to be notified (aside from the demolition of a State Heritage Place), unless it borders a neighbourhood zone, regardless of how it may violate any other provision. This seems like a terrible idea, and I would have the strongest possible objections to this.

Park Lands Zone- Riverbank Subzone

I am supportive of these changes. I support the development of more cafes, bars and restaurants in the Park Lands since these do facilitate leisure in the Park Lands. I would query whether the spatial extent should be greater given that the area in front of Adelaide University reflects a similar character to that of the Jolly’s Boathouse locale, and there may be scope for such development in this area.

Riverbank Zone- Innovation Subzone

I am supportive of this change, given that, realistically, it formalises the existing use, and preserves the key open space of the area over which it is applied.

Riverbank Zone- Entertainment Subzone

I am also supportive of the rezoning of this area, and the proposed changes to the subzone policy. I am glad that there are provisions in a broad sense to support the pedestrian connectivity between the riverbank and North Terrace, but I think there would be benefit to more consideration in this location for pedestrian and cyclist connectivity. It is currently extremely difficult to move between UniSA City West and the riverbank, and some form of connection which would link to the access road below the RAH to this site would be of great benefit. There would of course be substantial cost implications for a bridge over the railway lines, but it would be of great benefit.

For the record, I do not support spending public money on the new arena, but I do not object to the development itself. I think it could be quite good, just as the Adelaide Oval has reinvigorated the Riverbank- but I do not think it is the best use of taxpayer funds.

Riverbank Zone- Health Subzone

Unlike the other sections, I do object to this rezoning in a spatial sense, as well as to some of the provisions (though these provisions do relate to this spatial application).

There are far stronger defenders of the Park Lands than I, but there is a line which I believe this crosses. The Park Lands should be about giving Adelaide a green space where residents can spend their leisure time. Certainly, the gaol and the police barracks do not fit with this concept, and nor does most of the development along North Terrace. But the space along North Terrace was not reasonably useable for such a purpose, and has been put to use for the best reasonable public good.

The gaol and the police barracks should not have been built there in the first place (over 100 years ago), but why compound that mistake by taking more of what should be parks for people, and making it a park for cars?

The other development for Park Lands clearly supports leisure, but a car park does not achieve this. I readily concede that the olive grove at present is not a publicly useable space, but again, why compound that problem by making it a car park when there are surely uses which could benefit the public to a far greater extent?

More specifically, with relation to the proposed policy, I am supportive of adaptive reuse of the police barracks, since it would be pointless to demolish heritage buildings in order to return them to Park Land. However, I am generally sceptical of this being for medical facilities, with tourist accommodation seeming to be more appropriate to me given the nature of the buildings and their location (again, on the basis that this proverbial ship has sailed). Indeed, it might be better for this to be a place to support rough sleepers- but this is probably too radical an idea.

I do not however support the adaptive reuse of the gaol. While I do not profess to be well aware of the viability of continuing the operation of the gaol in its present form, I do not believe that adaptive reuse of this would be appropriate, especially not as healthcare facilities as the policy would suggest. I cannot imagine that many people would appreciate being treated in former gaol, and the only examples of the successful adaptive reuse of former gaols of which I am aware is as a youth hostel.

Again, I do not believe that is an appropriate use of this site (especially given that this would seem more appropriate for the police barracks), and I would urge that the gaol be kept as its present use as a tourist attraction.

Furthermore, the inclusion of the balance of Kate Cocks Park, not proposed to be used for the car park seems unreasonable. While I appreciate that some of the area is presently used for at grade car parking, the balance of the park should, in my view, not be used for any development which does not facilitate leisure and recreation. As such, I would strongly oppose the inclusion of this in the Health Subzone.

I also note a typo in PO 1.2, where the subpoint which should be listed as (b) is listed as (a).

In any event, I do not support PO 1.2, since this would transition the primary purpose of this section of the Park Lands away from leisure to healthcare. I recognise that it could be argued that it has not been used for leisure since the police barracks and gaol were constructed, but again, I believe that this use was itself an aberration (without being too dramatic), and this land could reasonably, and therefore should, be returned to public recreational use.

So, if the car park is a necessary development for the hospital to proceed, but shouldn't be built on the olive grove, surely then it should be built on land that is less able to be used for a more valuable purpose. The question then becomes one of where there may be another opportunity to build such a car park. While the best option may be the surface carparking behind the former Newmarket Hotel, there remains the triangle of land surrounded by the railway lines. This land would otherwise be useless- not reasonably used for recreation and leisure- so why not use this for the car park? It would be slightly less convenient for construction, and linkages to the road network and hospitals would be slightly trickier, but by no means to an impossible extent. It seems to me that this would be a much better compromise solution, on land which is already within the Health Subzone, and could be connected by under or overpasses to either the existing hospital access road and/or to Gaol Road. This seems a much better outcome, and one which I would be supportive of.

Summary

The following summary is presented in dot point form for ease.

- Extremely concerned that all development in the City Riverbank Zone would be exempt from notification unless it involves the demolition of a State Heritage Place, or is adjacent to a neighbourhood type zone;
- Broadly supportive of changes to the Adelaide Park Lands Zone including the addition of the Riverbank Subzone;
- Supportive of the changes to the Riverbank Zone- Innovation Subzone;
- Broadly supportive of changes to the Riverbank Zone- Entertainment Subzone;
 - Would like to see consideration of improvements to pedestrian and cyclist connectivity across the railway lines;
- Opposed to the changes to the City Riverbank Zone- Health Subzone;
 - Believe that this area should be returned for public recreation, when a better option exists in the form of the railway triangle or the development of the existing surface level carparking behind the former Newmarket Hotel;
 - Concerned at the inclusion of the balance of Kate Cocks Park not proposed to be used for the car park or for the adaptive reuse of existing buildings, and would strongly urge that, if the Commission is of a mind to allow the Health Subzone, that this section be deleted.

Elar Kraav

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards,

Elar Kraav

Elbert Brooks

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Elbert

Family name: Brooks

Organisation:

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Phone number: [REDACTED]

Comments:

Proposal is based on a false self-serving premise and detracts from the Adelaide Park Lands Act 2005, ie its purpose & statutory principles, and the statutory functions of its Authority. The PARK LANDS are INTEGRAL to the identity of Adelaide as a City. They contribute to its uniqueness, character and activities, both now and for generations to come, as during preceding generations. It is that land use & future use, that is of state significance and of cultural, environmental & historical significance now & in the future. Riverbank Precinct code amendments detract from & diminish the Park Lands (distinctive, natural, open, enjoyable, and unique benefit to the city). Riverbank Precinct is a bureaucratic artifice of previous governments that ought not be extended to alienate yet more Park Lands (~71ha). The proposed permitted uses can be located on land purchased outside of the Park Lands. Locating on Park Lands a new Women's and Children's Hospital (WCH); entertainment "Arena"; "adaptive re-use" of Park 27 for private investment and buildings; reducing "Frome Park" to a pedestrian link to permit built form like the school and "Lot 14"; and putting built form on the north banks/area, will not 'activate' the Park Lands or contribute to the economy of the City in a manner that would not otherwise occur by using non-Park Lands. To suggest these uses and benefits can only be achieved by alienating Park Lands is disingenuous or obtuse. They can be placed on zoned land outside the Park Lands. Enabling car parking is self-evidently mocking-worthy and gobsmacking; there are non-invasive options, e.g., below any WCH structure or above railway lines. The euphemisms and vagaries of the proposal and extent of permitted uses are anathema to retaining or enhancing the value of the current Park Lands per se, to the city, and to future generations of greater Adelaide and South Australia. This code amendment is objectionable and ought not be supported. (2000 characters; seriously?)

Attachment: No file uploaded

sent to proponent email: plansasubmissions@sa.gov.au

Elbert Brooks (The North Adelaide Society Inc)

Code Amendment Team

c/- Ms Caroline Mealor,
Chief Executive, Attorney-General's Department
Government of South Australia

By email only:

plansasubmissions@sa.gov.au

Dear Ms Mealor

Consultation – Riverbank Code Amendment – Adelaide Park Lands – Submission

Please accept the attached letter (and attachment) as the submission of The North Adelaide Society Inc. in respect of the above matter.

Please kindly confirm receipt of this email and attached letter.

Kind regards

Elbert

Elbert Brooks, Chairperson, The North Adelaide Society Inc. (est. 1970)

My email for TNAS Inc.: northadelaidesociety@gmail.com

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NOTE: personal contact details are not for publication.

cc. State Member for Adelaide, Hon Rachel Sanderson, MP

26 October 2021

Code Amendment Team
c/- Ms Caroline Mealor,
Chief Executive, Attorney-General's Department
Government of South Australia

By email only: plansasubmissions@sa.gov.au

email is the preferred mode of correspondence
northadelaidesociety@gmail.com

Dear Ms Mealor

Consultation – Riverbank Code Amendment – Adelaide Park Lands – Submission

Please accept this letter and the attachment as the submission of The North Adelaide Society Inc. in respect of the above matter.

The North Adelaide Society Inc. (TNAS) has an extensive and diverse membership, and a long history of advocacy in relation to planning, both in the context of urban built form (incl. residential, business, commercial and visitor) and the environmental and cultural aspects of the life of the city (incl. Park Lands, open space, ecology, and people). That advocacy is conducted in the interests of where people live, work, or visit; and the character, culture, heritage and empathetic future development of the diverse precincts and communities that comprise Adelaide as a city, including its nationally and internationally recognised iconic Park Lands.

This submission addresses the concerns of TNAS in relation to the proposed code amendment. Frankly and respectfully, TNAS is aghast at the sheer audacity of the breadth, depth, and scope of the regressive, destructive, and deleterious nature of the proposal amendment. Save for the obvious public interest in a new Women's and Children's Hospital, albeit a public health facility that can be located outside of and without diminishing the Park Lands, there is little if anything that warrants even a modicum of support.

For the reasons addressed in this submission, TNAS vehemently and unreservedly objects to, and does not support, the proposed Riverbank Precinct Code Amendment.

The Park Lands, the city and its commercial, visitor and residential life, and future generations, deserve much better.

With great respect, Colonel Light must surely be turning – spinning – in his grave.

Yours sincerely,

The North Adelaide Society Inc.

(est. 1970)

(electronic signature)

cc. State Member for Adelaide, Hon Rachel Sanderson, MP (adelaide@parliament.sa.gov.au)

RIVERBANK PRECINCT CODE AMENDMENT

Introduction – conserving the value of Park Lands

1. The Riverbank Precinct of the Adelaide Park Lands is one of the state and city's most iconic vistas, a literal postcard image of Adelaide, and is emblematic of the city's unique design that seamlessly marries a sprawling public park with a delineated CBD and adjacent urban areas.
2. Any interference in this area must be taken incredibly seriously, for what is lost may not ever be reclaimed, and any changes must be guaranteed to enhance and not be to the risk of detriment to an invaluable feature that is so central to our city's spirit, success, international standing and iconic status.
3. The comments of the Australian Institute of Landscape Architects¹ about a report of the RMIT Centre for Urban Research,² are apposite and salutary.

“The report found that ... Adelaide, ... actually include[s] comparatively little parkland within [its] metropolitan boundaries. The report ... found Adelaide is the most park-poor capital in Australia, with a mere 10 percent of the city qualifying as parkland. By way of comparison, 57 percent of Sydney's metropolitan area is allocated to parkland, with Perth not far behind at 40 percent. ...

“There is little evidence that contemporary leaders share the foresight of their forebears, in building for generations to come. ...

“Most policy experts would agree ... with access to parkland a broadly accepted and important characteristic of a liveable city. Parks, of course, have long been appreciated from an urban beautification perspective, but research is also increasingly finding they have very direct and quantifiable benefits to public health.”

4. The conservation of the full extent of the Adelaide Park Lands is an imperative for today, tomorrow and the future of Adelaide. The proposed gross carve-out by this proposed Code Amendment, together with incremental erosion, undermines the value of the Park Lands and diminishes Adelaide as a unique and liveable capital city.
5. The North Adelaide Society Inc. (TNAS) has a long history of active participation in the life and interests of the City of Adelaide, its signature Park Lands and the planning systems that have variously supported and assailed the various features of the city, no less so in the last decade as has periodically occurred in the preceding decades.
6. It is in that context that TNAS has reviewed, and provides its submission about, the proposed Riverbank Precinct Code Amendment (the “Amendment”).

¹ “Foreground” – <https://www.foreground.com.au/parks-places/garden-cities-no-australias-leafy-urban-centres-pressure/>

² “Creating liveable cities in Australia: Mapping urban policy implementation and evidence-based national liveability indicators”, Arundel & Others, RMIT University Centre for Urban Research, Oct. 2017

Adelaide Park Lands Act 2005 – code amendment at odds with

7. TNAS supports the principles of seeking to enhance and activate the iconic Adelaide Park Lands so long as all changes are in keeping with the spirit of what make the Park Lands so uniquely valuable, expressed wonderfully by the seven statements of principle that undergird the *Adelaide Park Lands Act 2005* (the “2005 Act”). With due respect to the proponent, TNAS respectfully submits that the proposed rezoning in the Amendment is fundamentally misguided about the extent of value and benefit the Adelaide Park Lands add to the city and the state.

8. While the Amendment would of course mean that the principles of the 2005 Act would no longer apply, it is worth contemplating whether any development that would violate these principles is a wise one. The principles are broad, they promote greater ‘activation’ and ‘enhancement’ of the spaces for the public’s use, and they are not restrictive. These principles would only be seen as restrictive by those who would aim to knowingly erode what makes the Park Lands uniquely and immensely valuable.

9. The most fundamental and overarching issue with the proposed Amendment is that the proposed new uses for this public Park Lands space is completely antithetical to the purpose of the Park Lands. That purpose, as perfectly stated in the second of seven principles in the 2005 Act, is that the Park Lands “*be held for the public benefit of the people of South Australia and be available for their use and enjoyment.*”

Structures antithetical to the Park Lands

10. The Amendment allows for several new buildings of up to 20 storeys. That itself is sufficient to bear the wrath public derision and opprobrium. High rise built form is not within any contemplation of the affected areas of the Park Lands. Its introduction will detract from and undermine the land economics of commercial zones of the city. It will undoubtedly be used for private commercial purposes, which can readily be accommodated within commercial zones of the city. It makes the proposals all the more audacious in the extreme in yet further alienating and removing from public use what are presently parks within the Park Lands. TNAS objects and does not support any code amendment to the foregoing effect.

11. The Amendment allows a 15 storey car park, which seeks justification from being said to be for use by a new hospital. TNAS suggests that no reasonable person could fail to see the perverse irony of giving over Park Lands to a gross multi-level car park that could – if a hospital is to nonetheless be located on Park Land – be built or located underground or in an adjacent area outside the Park Lands. How by any measure of reasonableness can an above ground multi-level car park be proffered as a genuine well-considered use of the Park Lands? TNAS objects and does not support any sort of amendment to the foregoing effect.

12. The Amendment allows a new arena on Park Land – existing parks – for which Adelaideans and South Australians have for many generations – and Kaurana people for countless earlier generations – enjoyed free and unalienated access to open and natural spaces the value of which has been even more accentuated during the current

pandemic. Instead, they will be faced with what some may see as a 'pretty structure' accessibly not by all or anyone, but only by those whose access for a fee whose entertainment will be subsidised by the 'free' but invaluable open space land on which it rests. This must surely be a 'corruption' of what Colonel Light envisioned for our iconic irreplaceable Adelaide Park Lands and what South Australians and visitors understand to be the immeasurable value of the Adelaide Park Lands for this state and this capital city. Community land, if altered at all, should remain for community use. TNAS objects and does not support any amendment to the foregoing effect.

13. Beneath these overarching issues, there are evident specific issues with each proposed subzone.

Heath Subzone

14. The **Health Subzone** developments appear to be entirely to serve the new Women's & Children's Hospital (nWCH), which is proposed to be constructed on Park Land. TNAS acknowledges that there is a social and societal value in a nWCH. That of itself does not require it, and any asserted attendant built form, to be built on Park Land. That does not justify converting Park Lands into a Health subzone to permit all manner of health related entities. Health is not a benign activity; the 'rule of health' is interminable expansion and consumption of resources, and what is contemplated is a self-contained mini-city disconnected from the city, which is grow in the 'name of health'.

15. This locality, however, is unfit for selection not only because it is Park Lands, but it is also home to two iconic heritage sites (Adelaide Gaol and the Police Barracks) and Kate Cocks Park. While the two heritage sites are said to be protected (as has in the past been said vis a vis Park Lands), their value is not solely in their isolated preservation, but their value as contributors to the Park Lands and our history and culture, thus as a potential tourism draw and historical site. The current WCH is not on Park Land. The nWCH can be constructed on nearby commercial or institutional zoned land that is not Park Land.

16. TNAS notes that the carpark structure of some considerable – immense – size is proposed as an adjunct to the nWCH. That of itself is not a basis for acquiring and alienating Park Land on which to park cars; a perverse irony that cannot be lost on even the most blinkered bureaucrat or decision-maker. The construction of a 15-storey car park, as this Amendment permits, and apparently a bridge that will connect with nWCH, will detrimentally impact the atmosphere and effect of the heritage sites indicated, damaging their authentic historical effect and their impressiveness as tourism destinations, a giant leap backwards replete with lost opportunities within a Park Land and historical setting.

17. Furthermore, the potential destruction of Kate Cocks Park, a treed area of the Adelaide Park Lands, to construct a carpark, is so fundamentally misguided that it is challenging to elaborate on beyond stating the simple fact of its proposal. This is Adelaide Park Lands space, there is a park in this space, it is not where carparks go. If the nWCH is known to require, or is dependent on provision of, an additional car park

structure, this should have been considered when choosing the site for the hospital and not only now to be solved after the site has been selected.

18. The appropriate options for a carpark to service this new hospital location might be an underground carpark or purchasing non-Park Lands space nearby. As noted by representatives of the nWCH development team themselves at the ACC Special Meeting on 26th October, they have explored these alternate possibilities and openly stated that the reason they elected not to choose these alternatives was because of “higher cost”. Specifically, they noted the higher construction cost to create an underground car park and the increased energy cost to run an underground car park. It warrants repeating that this was the sole reason they are seeking to take up parts of the Adelaide Park Lands. This bizarrely open admission lays the choice clear: the ‘developer’ is not being forced into the Park Lands by any substantial factors, they simply believe they can get away with taking public land to lower their costs at the expense of the Park Lands, the reputation of the City of Adelaide surrounded by iconic public parks, and the heritage of future generations.

19. Adelaide usually does this much better and more creatively than what is contemplated by this heartless proposal and its callous code amendment. TNAS objects and does not support the rezoning or an Amendment to the foregoing effect, and most certainly not to give over Park Lands to immense car parks; a notion so supercilious as to warrant satire and parody.

Entertainment Subzone

20. The **Entertainment Subzone** developments are proposed on an area of the Park Lands that might not unreasonably be said to be currently not well utilised. That however is not the point. Just as many locations of commercial or residential precincts are not developed to their potential or at all, does not mean they have no value. Over many years, incremental improvements and public investment have largely and increasingly improved and made more accessible public open spaces within the Park Lands. The solution for a so-called underutilised location within the Park Lands is not to throw in the towel and rezone the area, but to put focused effort into reimagining how this park and open space can be used in line with the spirit of the Park Lands spirit and the seven principles of the 2005 Act. Such is the work of the Park Lands Authority and many others in that endeavour.

21. The construction of 20 storey buildings and an arena, as indicated above, are not in keeping with the purpose of Park Lands community space. Furthermore, the vague notion that these buildings will transition in scale down to the waterfront is so self-serving and lacking vital quantitative or qualitative specificity that such developments may easily rise up to achieve characterisation between “fundamentally inappropriate” and “infamous monument to obvious disaster”. Furthermore again, this suggested guideline of transitioning scale is plainly already violated by the proposed arena that shows no transition of scale to the waterfront at all. TNAS submits that yes, this location can be reimagined, but in a way wholly consistent with the Park Lands spirit and the Adelaide Park Lands strategic plan, neither of which has a scintilla of a suggestion of an entertainment arena and all that that entails. TNAS objects to this rezoning within the Amendment.

Riverbank Subzone

22. The **Riverbank Subzone** is, as discussed above, a postcard image of the city. Its aesthetic, as well as its spirit, must be preserved.

23. Over the lifetime of the city, much of the original Park Lands space between North Terrace and River Torrens / Karrawirra Pari has been steadily built upon (particularly between Adelaide Bridge and Morphett Bridge) and become largely if not wholly irretrievable. What remains on the southern riverbank is a sliver of green space that only just preserves the river's natural aesthetic. The proposed code would allow built form up to the water's edge, on-water built form, and built form on the northern riverbank. It is worth noting here that there are currently a handful of venues already allowed to operate in this precinct to assist in activating the area and that do not violate the principles of the 2005 Act. The site also receives additional 'activation' via several events that temporarily utilise the space, as is, on various occasions during a calendar year. If current venues and events can activate the space under the current zoning rules, there is no reason to amend it. If additional activation is desired, it evidently can, and thus should, be done in line with the current code and the 2005 Act. TNAS objects to and does not support, this rezoning within the Amendment.

Innovation Zone

24. The **Innovation Zone** proposal provides essentially no information about why this rezoning is desired, what is problematic with the current zoning, and what would be done consequent on new zoning and removal from the Park Lands. The area is currently an excellent green space that provides not only inherent value but is a perfect connecting space to the Botanic Garden, which would well respond to botanical reimagining and verdant sculpturing as open space within a park. TNAS objects to this rezoning within the Amendment.

Subzone enhancement

25. It is noteworthy that in none of the sub-zoning suggestions has there been any articulation of how to enhance these sites as Park Lands spaces rather than as concrete-based spaces that of themselves have no reconnection to the commercial, business or institutional precincts of the city. Rather they are posited as concrete self-absorbed outposts within what would otherwise be and remain as Park Lands. Future efforts to modify, enhance, or activate Park Lands spaces should be aimed at enhancing the spaces in line with the 2005 Act's principles, not by avoiding or negating them.

Alienation of process

26. It is somewhat astonishing that the proposed Code Amendment would appear to result in there being no requirement (or need) for public notification or consultation for any of the built form impacts planned for these spaces (except where heritage sites are concerned, which is obviously minimal). It is concerning that this amendment fails to recognise that, were it successfully adopted, these spaces should be developed in meticulous consultation with the public.

27. To clarify, TNAS does not seek the passage of the Amendment with consultation added but expressly objects to its adoption altogether and only notes this element to further clarify the Amendment's fundamental misunderstanding of the Park Lands' value and to divorce the public from any consequential participation in resultant built form proposals. There would be, of course, no reason to avoid consultation on any project that would be accepted and welcomed by the populace that a government or bureaucracy purportedly serves. If the fear is that consultation may invite detrimental or negative feedback that may stifle or impede a built form proposal then, put simply, that's why consultation is necessary. In fact, that would in a sense affirm a regressive and arguably oppressive policy desire to continue to preclude public participation in matters of public interest (i.e., publicly funded built form). It would seem contra to contemporary

governance for a public body to prioritise reduced transparency to allow swifter changes that the public would or might wish to have a right to comment upon or object to, such as willingly and knowingly using public resources/funds/land for purposes deliberately at odds with a purpose or use (e.g., the Park Lands) with which the public may be endeared. That might also be considered to undermine or detract from bona fide consultation, including in respect of this code amendment proposal. Naturally TNAS objects to this element, as would any well-intentioned actor.

28. To the extent that any aspect of the Amendment might see 'the light of day' and regrettably cast a shadow over the affected parts and parks of the Adelaide Park Lands, TNAS would support and encourage the maintenance or enhancement of community consultation in all ensuing built form proposals, and would support requisite public consultation processes and substantive rights to be heard in relation to future Park Lands proposals, alienation of land from the Park Lands, impeded public access to Park Land the subject of the Amendment, and all built form proposals if the Amendments are given effect to in due course, regrettable as that may be.

Cultural alienation

29. Last but farthest from least is the issue of the Kurna people and their connection to sites within these rezoning areas covered by the Amendment.

30. TNAS is not a body that can speak with authority on the location or importance of indigenous sites. However, TNAS would join with others in supporting the utmost importance of listening to First Nations groups when they speak on these issues. There appears to be no shortage of outspoken outrage, betrayal, and heartbreak from the Kurna community since this proposal was announced. To the extent that the Riverbank Precinct includes, as is stated to be the case, important burial sites, meeting sites, and other sites of significance that would be destroyed, desecrated, or rendered useless to its people by the Amendment or consequences thereof, those matters are necessarily to be addressed. To not so do would be unworthy of Adelaide and culturally disrespectful. There appears to be some considerable doubt that there has been sufficient or appropriate consultation in that regard.

31. Consultation with the Kurna people on matters like this must not be rushed and it would be completely inappropriate and disrespectful for that to occur merely to expedient the Amendments or any consequential processes vis a vis built form proposals. Although a matter for the Kurna people, TNAS would respectfully lend its support to ensuring effective consultation and giving effect to addressing their concerns in relation to the Amendment.

Objection

32. For the foregoing reasons, both generally and zone-specific, TNAS objects to and does not support the proposed Riverbank Precinct Code Amendment (the areas of which are indicated below).



The North Adelaide Society Inc. (est. 1970)

Elbert Brooks, Chairperson

David Fox, Secretary

Elisa Toome

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Elisa

Family name: Toome

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: There should be NO re zoning of the Riverbank precinct. Adelaide's Park Lands are unique. Adelaide has the only Park with a City inside it. This uniqueness needs to stay. The Park Lands need to be preserved for all South Australians to use. There should be no development of any type on Park Lands. There should be No hospitals, car parks, stadia, apartments, shops, medical centres. If an area of the Park Lands is underutilized then it needs to be reclaimed, re greener & remediated. The State Government must not re zone the Park Lands. The State Government must fight to protect & preserve Adelaide's unique Park Lands.

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Attachment 5: No file uploaded

sent to
proponent email: plansasubmissions@sa.gov.au

Elise Myatt

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Elise

Family name: Myatt

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Dear South Australian Government, My name is Elise, and I am a long-time member of the Adelaide Rowing Club, the oldest and most historic boat club in South Australia. Our club rooms and boat shed are situated on the bank of the River Torrens near the Convention Centre at 1 Festival Drive, and have been since 1882. It is a vital piece of our club's rich history, with many functions being held there over the past 140 years including season openings, boat christenings, and annual club dinners. Our facility is also available to the public to hire out, with many birthdays and weddings receptions held there. Additionally, the downstairs area is a dedicated gym facility, vital to our training and ensuring our regatta success, with our Women's 1st Grade Eight winning the Open Eight Sate title seven years running - the longest winning streak ever in that category. Like all members, I have many happy memories associated with the club rooms, and to take away our club rooms would leave devastating impacts not only on active members but the entire community of athletes past and present. Likewise is true for our neighbouring clubs; Norwood Morialta High School, Adelaide High School, Unley High School, Scotch College, and Pembroke School, who would all be inconsolable if their beloved sheds were demolished for this redevelopment. Therefore, I implore the South Australian Government and the Adelaide City Council to approve the Riverbank Precinct Code Amendment, which would save our club rooms and beloved boat shed. To my understanding, a new facility has been proposed to store our boats in the new development, but that cannot replace the our clubs rich history or the memories we have made at our club rooms. They serve a greater purpose than just a training facility, it is a place to meet, gather, and celebrate with our friends and family, making irreplaceable memories. All would be destroyed if the current redevelopment plan goes ahead. Please, save our shed.

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sent to
proponent email: plansasubmissions@sa.gov.au

Elise Russell

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Elizabeth Crisp (Prospect Residents Association)

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Advocacy Organisation

Given name: Elizabeth

Family name: Crisp

Organisation: Prospect Residents Association

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: SUBMISSION RIVERBANK PRECINCT CODE AMENDMENT The Prospect Residents Association objects to the entire rezoning of the Riverbank and the proposed Code amendment based on the following information. Submission attached. We support the Community Alliance submission and the objections of the Adelaide Parklands Association and also support the majority of the Adelaide Parklands Authority's response to this proposal. We support the sentiments of the Chair of Greening SA. Since 2005 the Park Lands have received protection when the State Government passed the Adelaide Park Lands Act 2005 (SA). At the meeting on 30 September 2021 of the Adelaide Parklands Authority the minutes state "The Board whilst supportive of a new Women's and Children's Hospital development was not supportive of an expansion of built form into the Park Lands."

Attachment: Prospect_Residents_Association_Parklands_submission.pdf, type application/pdf, 5.8 MB

sent to proponent email: plansasubmissions@sa.gov.au

SUBMISSION RIVERBANK PRECINCT CODE AMENDMENT

The Prospect Residents Association objects to the entire rezoning of the Riverbank and the proposed Code amendment based on the following information.

We support the Community Alliance submission and the objections of the Adelaide Parklands Association and also support the majority of the Adelaide Parklands Authority's response to this proposal. We support the sentiments of the Chair of Greening SA.

Since 2005 the Park Lands have received protection when the State Government passed the *Adelaide Park Lands Act 2005* (SA). At the meeting on 30 September 2021 of the Adelaide Parklands Authority the minutes state "The Board whilst supportive of a new Women's and Children's Hospital development was not supportive of an expansion of built form into the Park Lands."

Major Fault in the system: FAIL

We have major concerns that the Minister of Planning, The Honourable Vicky Chapman has the sole power to decide whether to accept or reject this Code amendment. This is a massive change of policy for the parklands and should not lie in the sole responsibility of one Minister. What criteria does she have for making the decision that is so far reaching? The State Planning Commission should stand aside as their bias towards development creates a significant conflict of interest with this proposal. Planning SA cannot be trusted as they are biased towards developers and against the concerns of the general public and have a perverted and suspect commitment to green space. This Code amendment is another example of Plan SA and the State planning Commission trying to manipulate the general public to get an outcome that is of very serious concern.

"State government, the opposition, State agencies and authorities, and the Adelaide City Council, should actively seek to cooperate and collaborate with each other in order to protect and enhance the Adelaide Parklands" Once ruined they cannot be reclaimed.

General glib and meaningless statements.

Do the proposed amendments reflect the vision to create a premier health, entertainment and cultural boulevard, a question asked in the Quick Poll?

What does this mean? This is a leading question that assumes this code amendment will go ahead. The question should read: Do you believe that the proposed code amendments should occur and create a premier health, entertainment and cultural boulevard on our precious Parklands. The answer to that alternative and more accurate question is a resounding NO!!

The words in the Quick Poll statement are misleading. The words are general and glib. You could say or ask this about any place in Adelaide. Where is the detailed proposal and how does this relate to the statutory principals of the Adelaide Park Lands Act 2005:.



**Prospect Residents
Association Inc.**

ABN 18600859844.
Registered No. 12864M

PO Box 287, Prospect,
South Australia 5082

prospect.residents.assoc@gmail.com

Facebook: <https://bit.ly/2Lt8jil>

<https://www.prospectresidentsassoc.org/>

16 October 2021

“An Act to establish a legislative framework that promotes the special status, attributes and character of the Adelaide Park Lands; to provide for the protection of those park lands and for their management as a world-class asset to be preserved as an urban park for the benefit of present and future generations;”

4—Statutory principles

(1) The following principles are relevant to the operation of this Act:

(a) the land comprising the Adelaide Park Lands should, as far as is reasonably appropriate, correspond to the general intentions of Colonel William Light in establishing the first Plan of Adelaide in 1837;

(b) the Adelaide Park Lands should be held for the public benefit of the people of South Australia, and should be generally available to them for their use and enjoyment (recognising that certain uses of the Park Lands may restrict or prevent access to particular parts of the Park Lands);

(c) the Adelaide Park Lands reflect and support a diverse range of environmental, cultural, recreational and social values and activities that should be protected and enhanced;

(d) the Adelaide Park Lands provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City in a manner that should be recognised and enhanced;

(e) the contribution that the Adelaide Park Lands make to the natural heritage of the Adelaide Plains should be recognised, and consideration given to the extent to which initiatives involving the Park Lands can improve the biodiversity and sustainability of the Adelaide Plains;

(f) the State Government, State agencies and authorities, and the Adelaide City Council, should actively seek to co-operate and collaborate with each other in order to protect and enhance the Adelaide Park Lands;

(g) the interests of the South Australian community in ensuring the preservation of the Adelaide Park Lands are to be recognised, and activities that may affect the Park Lands should be consistent with maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

This Code amendment does not meet any of the statutory principles of the Act and therefore should not occur.

The Parklands are for all the people of South Australia not just those that play or watch sport or want to live on stolen land in fancy apartments. It is easy to find fault with parts of the park if it has

not been properly maintained but this is not a reason to turn it into an extension of the city. Rather the government should be looking into the reasons parts of the park have not been maintained properly and fix the problem instead of for example dumping river silt on sections. There are plenty of restaurants in the city that are struggling, The government should be looking at how to help them rather than building more in the Riverbank area and causing more businesses elsewhere to go bust. It is clear that building a large office block next to parliament house will cause more buildings in the city to have vacancy problems. How is this helping the economy? When the government talks about the economic gains through something like this proposed change of use they never include information about the job losses created elsewhere by such a move. Thus it is all spin to argue to make changes that should not be occurring. There are often many job losses and economic losses elsewhere created by plans such as these so the argument that these changes will create employment and jobs is a fallacy.

This just appears to be someone's big picture vision full of assumptions with no real evidence that the rezoning of the parklands will somehow benefit the economic development of the state and no evidence that there has been any exploring of a range of alternative options that might also benefit the economic development of the state. That is appalling. Where is the information that shows other options have been explored and where is the evidence that butchering the parklands will be a better option than other options. Where is the evidence that this is not in contradiction to the principles of the Adelaide Park Lands Act 2005.

This Code amendment recommends significant change in desired land uses and will introduce a large range of developments (including high rise buildings, shops, accommodation, multistorey car park, entertainment and sporting facilities) that are currently not allowed by the Adelaide Park Lands zone in the Planning and Design Code and the Adelaide Parklands Act 2005. This is unacceptable.

Health Subzone – not supported

We are unable to support this rezoning and thus support the development of the Womens and Childrens Hospital next to the Royal Adelaide Hospital due to a complete lack of critical information.

To actually support this rezoning for the nWCH we would need to see and be consulted on the actual plans and know for sure what the footprint will be and that this does not impinge on and destroy the State heritage listed Old Adelaide Gaol, historic olive grove and historic Police Barracks and that there is an alternative to the car park being in Kate Cocks Park (Park 27). Until this information is available we cannot support the rezoning.

- There is no information about the foot print of this building and therefore what its impact on this area will be.
- There is no information about where the relocation of the pathology services will be and whether this area can accommodate yet another health service.
- We have no information on whether the build of the nWCH is fit for purpose and will meet the needs of the women and children of South Australia. At present the medical profession indicates that this building will not be big enough or solve the overcrowding and staff



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16 October 2021

shortage currently experienced by the WCH. It must not repeat the problems with the inadequate build of the Royal Adelaide Hospital.

- We do not support the car park being in Kate Cocks Park (Park 27) so would need to know what alternatives there are to this.
- We need to know that the setting of the heritage area would not be damaged by the WCH and proposed car park and should retain open space parklands for visitors to use public facilities with allow passive and active recreation in this area such as walking, fishing and picnicking.

The statement on p15 of the documentation:

- That a new W&C Hospital, requires new 'accessible connections' (a connecting bridge to a multilevel car park) to provide 'connections to nature for children, women and their families through their hospital journey'

is absolute rubbish. This can be achieved through good design of a building with atriums and courtyards in the ground floor and indoor plants strategically placed. This is just embellished semantics to try to argue for unacceptable planning changes.

What alternative locations have been explored for the placement of the nWCH , the pathology services and the car park. If this current proposal will not work then the new WCH should be built elsewhere

- ie compulsorily acquire the old heaven night club surrounds and instead of building monstrous high rise apartments here build the new vertical WCH and associated car parking (whilst preserving the State heritage hotel building). The government has no problems acquiring properties when it wants to. We understand vertical buildings have more efficiencies than horizontal buildings for hospitals. Views of the Western parklands would be evident by good orientation from such a site. Nature views could be gained in this way.
- Build the new nWCH at Lot 14 on the land that is not being returned to the Botanic gardens as promised. A tram service links this location to the RAH.

The Parklands are the lungs of our city. People are alarmed about losing so many trees and open space with the new planning system and infill development in the surrounding suburbs creating the heat bank affect so why would you build on the Parklands and reduce their capacity to be the lungs of our city by destroying even more trees, vegetation and open space whilst also promoting the Greening SA policy and program? Also the need to keep the parklands is important with so many apartment buildings now in the City and with many more being built. These people need to have access to open space and trees and vegetation. This code amendment is in direct conflict with Minister Speirs Greening SA program. Does that mean the greening program is a smoke screen/farce to pretend that trees and vegetation are important when to this government they really are not?

Riverbank Subzone – Not supported

Pinky flat should only have popup entertainment as appropriate which has been shown to work well but retains the parklands as parklands when not in use. Many large and small temporary events are already hosted in Pinky Flat, Elder Park, Barr Smith Walk. The current uses are managed under existing planning conditions and these locations revert to open park land areas when not in use. This allows for great flexibility in what occurs rather than permanent structures which can severely limit what activities can occur.

In the words of a fellow objector the Code amendment states words to the effect “That the banks of the River Torrens and Torrens Lake (‘the riverbank’) are required to be ‘activated’– an arrangement operational only on a temporary basis, but after rezoning will feature construction of permanent infrastructure, in the form of ‘low-scale’ (undefined) recreational activities... that ‘maximise community benefit’, as well as ‘small-scale’ (undefined) entertainment land uses that are unobtrusive and complement the open character and views of the River Torrens...’.” This is absolutely meaningless. We are sick and tired of the use of the words “activate” and “vibrant” which are not defined and the mere use of the words seem to be taken as they are enough to steadfastly conclude that something should definitely happen.

The view along the river from Elder Park has already been seriously damaged by the building of the bridge despite this being opposed by many members of the public (but supported of course by the sporting fraternity). It is a good example how one development (the Adelaide oval upgrade) impinges on other aspects of the Parklands (the need for a bridge to disperse crowds then substantially changes the beautiful view along the river). For members of the public who loved the peacefulness and calming influence of this view they now have to look at a concrete bridge. It is not the same but is a good example of how making permanent structures along this section of the Torrens will substantially change its use but not necessarily in a good way specially when there is no real plan to comment on. Who knows what permanent structures along this section of the river will do? Probably ruin it just like the bridge has especially when the rezoning will allow deemed to satisfy developments (ie this rezoning will allow developments to be complying in the old language) so that the community will have absolutely no say. If this happens this government will be walking a very fine line of potential negative community support.

Innovation subzone - Not supported

The documentation indicates that the proposal is to rezone the site for the Adelaide Botanical High School and includes the land next to the school which is currently open space. The Marshall government promised that land around Lot 14 would be returned to the parklands which is completely contrary to this code amendment. The government needs to stop lying to the community about their promises and start keeping them.

If this subzone is to continue to be used as open space then why rezone it. This is very dishonest. The rezoning is obviously aimed at deemed to satisfy land uses such as apartment living or accommodation of some kind. Once this Code amendment if approved developments in this space would be deemed to satisfy and would require no consultation with the public. This is dishonest.

This is in complete contradiction to the government promise of returning this area to the botanic gardens, open space and parklands, just one big lie. The government has been approving large numbers of huge apartment blocks in the city many of which have already ruined the look of places like North Terrace. More developments like this are not needed in the Parklands.

Our position on not supporting this amendment is further based on information provided by the Community Alliance our umbrella organization. This information is a significant reason for not rezoning this area. Also if the Premier ignores this evidence and proceeds with the rezoning of this area then he has no real commitment to Aboriginal issues and his words and actions in this area are dishonest and a fraud.

"Frome Park/Nellie Raaminyemmerin between the new Botanic High School and the Lot 14 site, was reclaimed as Park Lands from an old car park. This area was remediated by the Adelaide City Council in the late 1990s and is owned by the ACC. The extension of the site area is proposed but is a highly significant site for the Kurna People. The extension is strongly opposed for the following reasons:

1. This area is extensively contaminated and had to undergo remediation by burial and capping in order to meet the required standard applying to open space.
2. Under current regulations the site cannot be disturbed unless the whole of the contaminated material (which is about 1.5 M deep across most of the site) is removed to a regulated disposal site.
3. Additionally, the site contains a fully authenticated and documented Kurna Aboriginal burial site; the human remains have been retained in place and capped. That has been recorded and protected, listed on the Register of Aboriginal Sites and Objects, Aboriginal Heritage Act 1988. Again, it cannot be disturbed. Frome Park / Nellie Raminyemmerin allows the only access to the west side of the Botanic Garden, is used for WOMADELAIDE and other events.
4. No reason has been established for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Sub-zone) and indeed, in reality, it's nonsense, in that the area is precluded from such uses for the reasons given above.
5. The rezoning puts Frome Park at risk as currently it enables the transition from open green space to an ancillary area for Lot Fourteen and Botanic High School."

The proposal is also contrary to the current **Planning and Design Code, Adelaide Park Lands Zone**. The Desired Outcome in the Planning and Design Code seeks in the parklands :

A unique publicly accessible and well connected open space system, including the formal city squares, that creates a distinctive landscaped park setting for the City of Adelaide

A range of passive and active recreational activities with a high level of amenity, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of temporary events, such as festivals, concerts and sporting events.

Entertainment subzone – Not Supported

In this subzone as proposed we are extremely concerned about the code appendix (Entertainment Subzone pages 59-61) that reveals that this subzone will also allow built-form development up to 20

building levels or 71m in height, but such scale is not to be located adjacent to the River Torrens. However the subzone site (Helen Mayo Park 27) is adjacent to the River Torrens.

The state government has already announced that the arena is proposed at the edge of Torrens Lake. To build this arena this subzone has to allow for a substantial height. This trick can then be used for developers to negotiate for the land in this subzone and build the 20 storey apartments which would then be next to the River Torrens. This is highly misleading and calculating by the people drafting this code amendment.

Further in relation to this misleading content there is no explanation of what minimal deemed-to-satisfy or designated-performance-feature criteria actually means which is another demonstration that the assessment model that will be contained in this subzone is so vague that development applications for this sub-zone will require little to no precision or thoroughness or public consultation ie it will be easy for developers to get whatever they want.

This subzone on its own has been well summarised by some words from the Community Alliance

In our opinion that the state government to contemplate the mis-use of Adelaide's open space in the exhibited Code amendment displays a new low in unconscionable and dumb planning - on par with other examples such as the expansion of Mount Barker and Buckland Park's township on the Gawler River floodplain.

Furthermore, there is no provision for formal public notification once the area is rezoned when the state and favoured developers propose developments on and off water in and along the Torrens River and Lake. Category 1 (no notification) would prevail for all significant projects within the Park Lands, despite being an area of public interest and ownership.

Given the need for community input in policy this amendment is not supported given its inconsistency with existing legislation and the Code's desired outcomes for the Park Lands.

We do not need another sporting arena in the city. Where is the integrated traffic plan that shows there will be no major traffic issues with such a massive development proposal?

We are also most concerned that the only discussion about integrated transport appears on pages 11 and 12 of the report. It suggests that the existing network is adequate, but if there is a need to modify the road network, amendments will emerge "in future development applications". This is atrocious strategic planning practice to rely on future applications to determine transport policy when this area already has significant traffic issues. At peak hour Morphett St has long delays especially from War Memorial Drive through to Flinders Street.

There is also considerable congestion at times on Morphett St and King William Street requiring considerable traffic controls and bus management when there is sport on at the Adelaide Oval. Add the theatre into this mix as well as people eating on streets such as Gouger St and in the two restaurants on the River Torrens and attending nightclubs in Hindley Street. In fact if you attend a



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restaurant on Gouger St on the night of a football match and need to catch a taxi home and live in Prospect you have to take a circuitous route home and struggle to find a taxi on the street. To add an arena into this mix will create traffic chaos and make the city out of bounds for people who are not attending these places. We have also found that traffic management reports in relation to developments in Prospect are highly inaccurate so we would have no faith in any traffic reports in relation to an arena development on Morphett St, a hospital and parking development next to the RAH, and apartments along the river in Helen Mayo Park and then later along war memorial Drive. They usually err in support of the development and the developers and then residents have to put up with significant traffic problems resulting from ill-informed approvals. This problem would be significantly exaggerated with an arena development in Helen Mayo Park.

Instead the government should develop an arena in the surrounding suburbs where the traffic can be managed instead of creating traffic chaos on Morphett St as an arena competes also with the convention centres and city traffic i.e. demolish and rebuild the Entertainment Centre on Port Road or develop the Hindmarsh stadium further or use the Gas works in Brompton which is already owned by the government and managed by Renewal SA. Stop trying to pinch and ruin the parklands and be more creative and use your entrepreneurs who are able to think outside the square and stop using developers and the property council as your consultants who have no interest in anything but development in inappropriate places that benefits them. Increase the membership of the State Planning commission so that it is not dominated by people from the development industry who are working towards wrecking Adelaide as a result of their own greed and include someone who better represents the environment and local government and heritage that proposals such as this receive a more balanced and representative approach.

Scope and Community Engagement

Community Engagement score: FAIL

We are very concerned about the scope of this document is presented as the opportunity for the community to comment and influence decision making when this is in fact a lie. The scope is tightly controlled by Plan SA and as such is very misleading and insulting to the public who vote and is presented as a "*fait accompli*" with the public consultation strictly controlled. In further words from the Community Alliance

"The process of community engagement after policies are consulted with stakeholders and drafted for a 6 week period is not consistent with the intent of the PDI Act's community engagement charter to engage fully on policy formulation, not comment on an already set of restructured provisions relating to height, land use and functions."

For example in the Engagement plan the Scope of Influence is as quoted:

"Aspects of the project which stakeholder and the community can influence are:



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- *Issues and/or opportunities that should be considered in the preparation of the Code Amendment*
- *The Code's spatial layers and policy applying to the subject land as a result of the Code Amendment."*

This is an insult to the community given the parklands belong to the SA public and the community is supposed to be involved in policy development. The parklands do not belong to any political party or to Plan SA or to the State Planning Commission who are all supposed to be the custodians of the parklands not the owners. As such the public should have a defining say in what happens to them.

It is really obvious that community engagement is a farce with restricted scope and complete disdain for the community by the technical complexity and tricky presentation. It is really obvious that the whole system is biased towards developers and business that now have increased ability to hoodwink the community in a system set up for them.

Is this really a consultation that is genuine, inclusive, respectful, well informed and transparent? It appears more to be a token consultation about a proposal that is ready to implement as soon as the consultation process has been finalised and the public opinion ignored. Where is the content of the strategic proposals that Renewal SA and the State Planning Commission (a group that has no objectivity due to being from the development industry with numerous conflicts of interest) have undertaken. Why is this information not available for this consultation? Why have state cabinet and the Capital City Committee hidden this information? What are all the players with vested interests trying to hide or is it just about bulldozing the changes through and tricking the public?

Community engagement is only genuine and respectful when all the information is available to the public in a form that is easy to understand.

One of the greatest failings of the new planning system is that the knowledge that is required to understand it is not held by most members of the public. Instead it requires technical and professional knowledge only available to the planning department, professionals and the development industry. And this new process is even more fatally flawed in that the public is now required to read huge amounts of information namely 88 pages of technical information, yet another way to make sure the public is not engaged as many people do not have the time or skills to read that amount of information. So it is a system that has made the whole planning process too complicated, too demanding of time for busy people, too abhorrent and too insincere to undertake genuine consultation with the public.

Summary

This is a land grab of the worst kind namely 10% of the parklands. This land belongs to the people of South Australia and the government is the caretaker not the owner. It is the government's role along with the Adelaide City Council to protect public land from greedy developers. Already there has been significant damage in the current Riverbank precinct. The new casino building is too close to the festival centre and instead of this being a creative area in peaceful open space it has become crowded and dominated by overbearing buildings. Offices are being built by an interstate developer



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where they are not needed and on public land. There are plenty of empty office places and spaces in the city where it is more appropriate for office workers to be. We should be developing city locations, not turning our parklands into our city.

In the excellent words of another submission writer we commend the following summary as being of completely in sync with our assessment

“Having omitted key information about other proposed Riverbank Precinct built forms (which would emerge in a Master Plan for the entire precinct), the substance of the public consultation focuses on a discussion riddled with academic planning complexities as if respondents are experienced, practising planners fully trained in the purpose and function of planning instruments such as the very recently activated code. In effect this public consultation says to likely respondents: ‘Never mind the park lands’ context and a current Planning and Design Code that features desired outcomes that ostensibly claim to protect the park lands zones from permanent built form. Instead, focus on the intricacies of revising a very recently adopted code that was ostensibly appropriate and fit for purpose for the Riverbank Precinct the day it was brought into operation (19 March 2021) but within six months is not longer fit for purpose in relation to the Riverbank Precinct.”

The government, the State Planning Commission and Plan SA have stooped to an all time low with this Code Amendment especially in lieu of the change from the recently released Planning and Design Code which protects this area. If you can do this to the zoning of the Parklands what’s next we ask that we will no longer have any trust in.

This attempt to deceive the community of South Australia is quite disgusting.

Elizabeth Crisp
President
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Elizabeth Farrant

I strongly reject the re-zoning of any part of the Adelaide Park Lands. We cannot claim to be a national park city if we continue to destroy our parks. If our churches were disappearing at the rate of our green space, we would quickly shed the name "city of churches".

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

I urge you to rethink the plans for our public spaces.

Regards,

- Elizabeth Farrant

Elizabeth Finck

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours sincerely

Elizabeth Finck

██████████

██████████

Elizabeth Ho

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Elizabeth

Family name: Ho

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This process is not acceptable; the timeline is not sufficient to allow the community to fully understand the ramifications. The construction industry has too much power and has shown it cares little for heritage or green space considerations. Our parklands go back to our European settlement beginnings. We are one of the last remaining parkland cities in the world and yet we see scant acknowledgment of this. It is a huge asset if used properly ! The way to go is with pop up opportunities widely used in European parks to support visits and mainly useful in warmer months. There are so many ways this could be approached with creativity. Currently we can see the poverty of design control all over our city and that provides no confidence that built incursions along our riverbank will not be of the same mediocre quality. We see trees being felled all over the inner city suburbs as well and blocks filled with tacky out of character building materials. Regarding hospital alignment - I reserve my opinion on that but would like to know what alternatives have seriously been considered. At the very least, the vacated womens and Childrens site should be devoted to community use if public land is to be sequestered - not given away to developers to make their fortunes. Let's concentrate on being a Parkland City as we approach net zero and witness new thinking across the globe on the value of healthy, green space in urban settings. We have it in place !

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sent to proponent email: plansasubmissions@sa.gov.au

Elizabeth McLeay

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: elizabeth

Family name: McLeay

Organisation: not applicable

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: In an increasingly crowded world we need as much green space as possible amid living/ working/ recreation areas. There are sufficient facilities in the current city space for cafes etc without intruding on the Parklands further. The Torrens is a creek and the current " lake area " retained by the Weir used to be drained and cleaned. It is not a river like the Yarra, Swan or Brisbane. Return the riparian growth and support some wildlife. The Parklands are public space. Stop selling or leasing it to private interests.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Elizabeth Rushbrook

Please find attached the submission from SECRA in regard to the Riverbank Code Amendment.

I would appreciate an acknowledgement of the receipt of this document.

Kind Regards

Elizabeth Rushbrook

SOUTH-EAST CITY
RESIDENTS
ASSOCIATION INC.

strengthening our community

25 October 2021

Riverbank Precinct Code Amendment
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

Attention: Code Amendment Team
Email plansasubmissions@sa.gov.au

The South East City Residents Association (SECRA) represents residents within the southeast precinct of the City of Adelaide and is committed to act on behalf of their concerns.

Of particular interest to SECRA is preserving the Adelaide Park Lands for the enjoyment and recreational use by residents of the south-east precinct of the city and all South Australians. With the current high rise and higher density residential developments within the City of Adelaide and surrounding inner suburbs, all being undertaken without the provision of associated recreational areas, the Adelaide Park Lands are becoming even more important.

It is pointed out that the custodian of the Adelaide Park Lands on behalf of South Australians, is the City of Adelaide and not the South Australian Government, a fact that has been disregarded by the current and past South Australian Governments by the actions and decisions made by them.

It is interesting to note that the South Australian Government's proposal to rezone areas of the Riverbank is to deliver world-class health, sporting, educational and biomedical precinct with strong connections to the city centre and to reinforce North Terrace as a premier cultural boulevard. There is little reference in the

documentation for the need for that area of the Park Lands to be available for the recreational enjoyment of the general public.

SECRA does not intend to comment on whether or not infrastructure such as a stadium, a new Adelaide Children's Hospital and associated car parking together with other proposed commercial projects are needed but is of the view that these should not be located on Park Lands in the Riverbank precinct.

When the South Australian Government proposes projects such as the North-South Corridor, the Government acquires private property to enable the project to proceed. However, when it comes to projects in the vicinity of the City of Adelaide, the current and past South Australian Governments have disregarded this principle. As a result, there has been a continuous reduction in the area of Park Lands accessible by the South Australian public for their enjoyment and recreational use.

If the South Australian Government was to use the same principle that it uses for projects such as the North-South Corridor, then it could have acquired vacated private property opposite the Royal Adelaide Hospital for the Adelaide Children's Hospital and the considerable area of vacated commercial properties alongside the Port Road opposite Bonython Park for the proposed stadium. However, it appears that the Government sees the Park Lands alongside the River Torrens in the Riverbank precinct as being theirs for the taking.

Because of the infrastructure created by successive Governments, visitors can no longer drive along North Terrace to see Adelaide's river flowing through the city. It would be a travesty if this were to also occur along the northern Riverbank.

Applying a new Riverbank Subzone to the northern side of the River Torrens to accommodate small scale development within that area of the Park Lands is inappropriate and is opposed by SECRA.

It is also unbelievable that there is a proposal to investigate the reuse of the state listed Adelaide Gaol and Police Barracks for biomedical and ancillary health services. As with many other cities around the world, the heritage Gaol should be kept as a tourist attraction.

While the heritage component of the Police Barracks should be retained and perhaps become a museum showing the history of the South Australian Police Force, the remainder of the site should be returned to Park Lands as occurred with the old Water Supply Depot at Kent Town and the Sewerage Depot at Thebarton.

In summary, SECRA's message is quite simple. The rezoning of the Riverbank Park Lands currently proposed by the Government should be rejected.

Regards

Elizabeth Rushbrook
Chair
SECRA

Elizabeth Vines

Please find attached my submission on this Code Amendment.

Please confirm that this has been received.

Thank you

Elizabeth Vines

Elizabeth Vines OAM, FRAIA, M.ICOMOS

McDougall & Vines, Conservation and Heritage Consultants

Architect, Partner, Adjunct Professor, Deakin University, Melbourne and Hong Kong University

Member, Australian Heritage Council

48 Seventh Ave, St Peters, South Australia, 5069

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MCDUGALL & VINES

CONSERVATION & HERITAGE CONSULTANTS

Code
Planning & Land Use Services Division
Attorney General's Department
GPO Box 1815
ADELAIDE SA 5001

Amendment Team

27 October 2021

Email: plansasubmissions@sa.gov.au

Dear Code Amendment Team

SUBMISSION – PROPOSED ADELAIDE PARK LANDS – RIVERBANK PRECINCT CODE AMENDMENT 2021

I write as a previous President of Australia ICOMOS (2012 – 2015). I am also now a member of the Australian Heritage Council (AHC). Both these organisations have now filed their submissions and this separate personal submission is to fully support and endorse the recommendations of both these parties. My key points and recommendations are as follows:

- The proposed Code Amendment and the development it facilitates will severely compromise the values on which the National Listing is based,. I consider it will be at odds with that National listing and, in particular, **the proposed resultant developments would likely trigger a requirement for referral under the EPBC Act. I therefore recommend that the Code Amendment be withdrawn**
- **All levels of Government need to commit to protect** and enhance the Adelaide Park Lands and City Layout – rather than seeing this land as “up for grabs” and free to develop. **City, State and Commonwealth systems must achieve greater coherence** in the protection and management of the National Heritage place.
- A comprehensive **heritage impact assessment** of all proposals need to be undertaken. In addition this approach would assist in identifying the obligations under the EPBC Act.
- **Kaurna consultation** is properly undertaken as part of any future proposed Code amendment affecting the Adelaide Park Lands.
- A **conservation management plan** for the National Heritage place should immediately be prepared, consistent with the National Heritage management principles and other requirements under the EPBC Act. The integrated management of the National Heritage place amongst the various land managers within the area is essential, and this should be documented in the conservation management plan.

I repeat that I recommend that that the Code Amendment be withdrawn as it will severely impact on the national heritage values of Adelaide Park lands. It is irresponsible that this Code Amendment even be proposed by the SA Government in its current form. Please be in touch if you require further information.

ELIZABETH VINES OAM

Elka Gale

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kind regards
Elka Gale

Elle Vallance

Hello,

I am writing to you about the proposed rezoning of the parklands.

I am opposed to the amendments to the Planning Code that will allow an open slather destruction of our green spaces.

There is an abundance of existing land within the Square Mile for car parks, sports facilities, health services & cafes. No more land should be carved out of our precious green spaces; certainly none along the River Torrens. Not everything has to be converted to concrete & commercialisation.

With climate change upon us, now more than ever, we need large expansive open green spaces to counter the heat island effect. These green sinks will be vital for discharging accumulated radiated heat during our scorching summers.

I reject the rezoning of any part of the parklands. The parklands are unique in the world. I want to see this government move forward in having the Adelaide Parklands given World Heritage status.

Kind Regards

Elle Vallance

Emily Toome

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Emily

Family name: Toome

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I absolutely oppose the rezoning of any of the Adelaide Park Lands for the purposes of "Entertainment" (e.g. an arena) or "development" (including cafes and shops). Open parkland is a finite and valuable resource. Councils/governments should be doing everything possible to preserve these freely accessible open green spaces. These spaces should not be commodified. These spaces should not be further developed. If anything, a re-wilding of the Adelaide Park Lands should be happening, returning local fauna and flora to the area wherever possible. All citizens of Adelaide deserve the opportunity to freely use the Park Lands, to benefit from the green space and connection to nature. There are ample already developed areas in Adelaide that can be used or repurposed for privatised entertainment and commerce. The Adelaide Park Lands must be kept as Park Lands.

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sent to
proponent email: plansasubmissions@sa.gov.au

Emily Winter

My name is Emily Winter, I am an active member of several Landcare groups, volunteer for several biodiversity groups, and am studying wildlife conservation at Adelaide University. One of the biggest issues I am learning about, and affects every area of my study, is climate change. The Adelaide parklands are one of the biggest weapons we have against climate change, and reducing the urban heat island effect. Removing any of the vegetation in the parklands is unacceptable, and the priority should be on boosting biodiversity, not destroying it.

We could be doing so much better, and truly leading the world in green urban spaces; if this rezoning goes ahead, we have much to lose that we will never get back.

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Erin Dockrey

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Yours truly,

Erin Dockrey

Fay Williams

Simply, I would like to make my vote to NOT CHANGE the zoning for the River Bank

Fay Williams

Felicia Rasheed

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Felicia Whittaker

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Felicia

Family name: Whittaker

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This proposed rezoning from historical to health will impact the historical attractions and parklands of the area. Then how many bike paths, access roads and grounds will be deemed unaccessible due to the hospital and parking lot requiring a not only the land for the building structures but also how much land will be fenced off for security/safety reasons. Then also the traffic which will clog the intersections to and from the city. I do not condone this change and how it will impact residents and the historical enthusiasts.

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proponent email: plansasubmissions@sa.gov.au

Felicity Sando

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: felicity

Family name: sando

Organisation: Private citizen

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: It is extremely disappointing to see the proposed rezoning of our important green and heritage places, significant trees and landscapes (Kaurna and post colonial) being slated for such massive Rezoning. There is plenty of underutilized space for parking and building in adelaide. Use the built areas we already have better. Adelaide should better develop its green credentials and further reinforce its place with caring for its significant parklands and waterways. Such proposals as the proposed planning changes risk Adelaide's world significance for its parklands Open green spaces are much more versatile for everyone to benefit - physically, mentally and environmentally. Giving these immense public spaces over to buildings seriously diminishes the public amenity and landscape potential of these areas. I think it is much more important to retain green open and publicly space in these areas.

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email:

Fiona MacDonald

See personal comments below:

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We do not need another Melbourne, - Adelaide is unique and the Riverbank along the Torrens, from Hackney Road to the Weir in particular (the Active Waterfront area and Entertainment area), is a much enjoyed special space that is wonderful to walk, relax and enjoy the tranquility and quiet in the middle of the city with beautiful views too. At other times this amazing space is used in a flexible way for events such as the recent Moon Lantern Festival, events like the French Festival, Royal Croquet Club, Festival events and other temporary events which are wonderful but are then able to be returned to their natural ambiance. Food and beverage 'outlets' should not be the main focus inspiring construction along the special space. I do not want to see a return either of structures in the water like the ugly floating stage that was present for some time.

I would like the Council to reconsider rezoning along the river banks of the Torrens from the weir to Hackney Road bridge in particular.

Thank you

Fiona MacDonald

Fran Whittingham

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Fran

Family name: Whittingham

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I am opposed to the commercial development and re-zoning of the areas along the riverbank taking in Pinky Flat, West of Montefiore Bridge and on the south side of the river up to the Weir. I am also shocked that there is a proposal to remove the old olive tree area where the police horses are grazed. I am sure that the Aboriginal community are also opposed to this intention to open up to development on these precious areas that currently ensure we maintain our reputation in Adelaide to respect our history. We are known for our green zones and the wonderful peaceful, tree lined walking paths along our river. I understand that the co-location of the Adelaide Children's Hospital is necessary and an improved service and also that extra parking space is needed. However I do not agree that the Olive grove/ green space is the place for a car park to be built. With this desire to centralise all the entertainment precincts and add cafes , shops etc. , this plan ignores the current struggling businesses already along the banks of the river and near the convention centre. A more helpful plan would be to better market, assist and promote the already existing development around the foot bridge, railway station and casino precinct. My final comment is that your quick poll is going to skew results the way it is designed. Hence I am providing my thoughts here.

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sent to
proponent email: plansasubmissions@sa.gov.au

Francene Connor

Dear Sir or Madam,

I wish to register my opposition to the proposed Plan amendment to the Riverbank precinct, which I understand closes at midnight on 27 October 2021.

I have read the documentation published setting out the proposed plan amendments and I cannot see any benefit to the Adelaide or South Australian community for any of the changes that are proposed. The only beneficiaries I can see are the overexcited developers and the SA State Government, which will, if approved, have open slather to desecrate, destroy and monetise our beautiful parklands.

The Adelaide Parklands are a place of sacred significance to the whole community - including, but not limited to local residents, metropolitan and country users of the parklands, tourists and visitors alike. They are a recreational haven for many runners, walkers and soakers enthusiasts who use them regularly to find peace of mind in a noisy City environment, helping to maintain the fitness levels of people of all ages.

You cannot treat the parklands like a vacant space. They are home to birds and other wildlife that rely on them for food and shelter. They are the lungs of our City and act to cool and lower the temperature of the surrounding bitumen-lined streets, which have fewer and fewer trees planted along them, reflecting cutbacks to City Council budgets.

It is an outrage that there has been so little community consultation on this proposed major amendment to the Riverbank Precinct. I have only recently been made aware of the proposed amendments and hence I have lodged this objection without the benefit of drawing on each section of the plan to individualise my objections. I am happy to do so before a public gathering or formal body as appropriate and with further advance notice.

I fail to see what imperative there is for this manic push to force such ill-conceived ideas for development capability onto this pristine part of our City environment. This is precious open green space and it appears that little or no thought had been given to the consequences this plan amendment has for a rapidly warming climate, which most sensible people appreciate shows the need for more, not less, open green space.

Please advise me of what further course of action may be available to me to object further and more strongly than I have been able to do in the current 'consultation phase'.

Yours sincerely

Francene Connor

Local North Adelaide resident and Adelaide City Council ratepayer (former Adelaide City Councillor and Alderman)

██████████
North Adelaide SA 5006

M: ██████████

E: ██████████

11:30pm on 27 October 2021

Frances Anderson

To whom it may concern

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. The Park Lands are what

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource. The Park Lands are what makes Adelaide Special.

Frances Anderson

Francesco Dizazzo

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Francesco

Family name: Dizazzo

Organisation: University of Adelaide

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The parklands are synonymous with the very essence of Adelaide. Generations have preserved them in the spirit of Colonel William Light and understood that they are essential to our standing as a 'garden-city.' With the ever-looming climate crisis, now more than ever is the time to preserve our environment, not "rezone" and develop over it. This proposal is contrary to the culture and history of Adelaide. Please do not ruin something so special to so many.

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proponent email: plansasubmissions@sa.gov.au

Frank Brown

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Frank

Family name: Brown

Organisation: N/A

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I understand that buildings are planned for Pinky Flat. If so it would be totally inappropriate to build ANYTHING permanent there! Seems that anything that is going to generate money for government or investors at the expense of the environment has become popular in Adelaide! Aesthetically it would be horrible to build in this naturally beautiful part of the river precinct, it is unnecessary and it is madness. Don't our governments and developers learn anything from the desecration that has occurred around our world - all in the name of making dollars? Please scrap the whole crazy idea of "uglifying" my city of birth. Enough madness has already taken place with developments around our beautiful city! Leave Pinky Flat alone!

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proponent plansasubmissions@sa.gov.au
email:

Frank Nicholson

I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks.

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Sincerely

Frank Nicholson



Belair, 5052

Fred Mann

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Fred Mann

telephone: [REDACTED]

Freya Davies

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Freya

Family name: Davies

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Any change to the planning code should prioritise the conservation of heritage, including the existing century-plus old trees, olive grove and places of significance to the indigenous Kaurna people. Consultation with First Nations people and acknowledgement of their unceded sovereignty and connection to this land should always be paramount when considering changes to the development planning code.

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proponent email: plansasubmissions@sa.gov.au

Freya Higgins Desbiolles

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Freya

Family name: HigginsDesbiolles

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: The unique asset Adelaide has is its planning as a green city surrounded by planned Parklands. Please do not undo what is our best branding aspect. Please also respect Kaurna interests and do not over develop our city periphery.

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proponent plansasubmissions@sa.gov.au
email:

Gael Fraser

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Gael

Family name: Fraser

Organisation: Community member

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Over the past few years there has been a huge increase in building and infrastructure located on Park Lands space. At the current rate of re-zoning and reconnecting and redevelopment, The Park Lands will become even more reduced, even more alienated from ordinary citizen access. The Riverbank Precinct Code Amendment proposal which will permit huge development to proceed is wrong and should not be supported. Governments should be stewards for our current and future citizens. Both the State Government and City Council are abrogating this role by simply seeing the Park Lands (even the scruffy bits) as "free land" which would be enhanced by more buildings. In planning terms, the notion of amenity as far as The Park Lands are concerned is always up for sale or use by business (sports, health, arts, education, transport). This land resource is finite. It is a gift for future generations, it is a bulwark against city pollution and a haven for nature and citizens. Any work supported by governments on The Park Lands should enhance the natural amenity not build stadiums and car parks, or indeed more hospitals. Use existing city land not free green space which belongs to all South Australians. As a planner, I despair of these endless battles. I have no hope that these consultations will make any difference, there will always be another sporting arena in sight! But if there is any sanity left in our planning process please bring it to bear on the central issue: more green space or more buildings?

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proponent email: plansasubmissions@sa.gov.au

Garry Morrison

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Garry

Family name: Morrison

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: Please keep the parklands as green nature space

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Gaura Bale

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Gaura Bale

Gavin Bowden

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Gavin

Family name: Bowden

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I feel sickened by the grab for even more of the Parklands for permanent commercial and government buildings. This adds to the disquiet that I feel whenever I see the large commercial monstrosity between Parliament House and the Festival Centre.

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proponent plansasubmissions@sa.gov.au
email:

Gavin Trott

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Gavin

Family name: Trott

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please make no changes or amendments to the Parklands, or its current usage, and no new Buildings, including hospitals, with accompanying car parks, and over and adverse use of the Parklands. No new stadia, all of which will/would adversely affect the Parklands and their intended, and best, use. Please simply leave alone all governments.

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proponent plansasubmissions@sa.gov.au
email:

Gemma Hutchinson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Gemma

Family name: Hutchison

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The government should not get rid of historical buildings that are part of a states history and past. All the historical events that have happened within the Goal and historical artefacts must be preserved for future generations also the architecture and buildings in Adelaide Gail are beautiful and it be a terrible thing for it to be destroyed

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email:

Geof Nairn

Submission by Geof Nairn Architect.

Since graduating in Architecture at University of Adelaide in 1964, I have practiced as an architect and urban designer in Canada (1968-73) and throughout Australia.

I was an Adelaide City Councillor (1993-95) and have published a book focused on the environment called 'Save Australia'.

Adelaide is nationally and internationally renowned as a 'Garden City' being surrounded by a parkland that makes it one of the top 10 most liveable cities in the world.

How dare PlanSA,(who ever they are,) and the current Government propose a plan to enable further building encroachment on our precious parkland.

There is plenty of property in the City available for Hospital and Recreation Developments, neither of which are remotely dependent on a relationship to the Torrens. To use the excuse that the Womens and Childrens Hospital has to be adjacent to the RAH and a large Recreation Centre has to be near the Convention Centre is absolute rubbish.

In my view it would be far more sensible to thoroughly renovate/redevelop the exiting Entertainment Centre which has the tram connection and carpark already, for a fraction of the probable \$850,000,000 cost of a new venue, which of course would leave huge existing Entertainment Centre to be locked up or demolished!

How about the Government attract a positive response from the voters by spending \$500mill. on upgrading the Parkland including the planting of half a billion trees and shrubs. A new Recreation Creation Centre will make no money for the State or Country, only the owners and operators. An upgraded Parkland will a massive economic and environmental impact, not to mention the contribution to the removal of CO2 from our atmosphere.

In conclusion, I am wholly against the proposed rezoning and would march against it.

--

Yours Sincerely,

Geof Nairn

██████████

████████████████████

Geoffrey Goode

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Geoffrey

Family name: Goode

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: My wife, Jasmine Goode and I ask that changes to the zoning of the River Bank precinct not be altered. The proposed re-zoning gives too many options for future development, in particular the prospect of high rise development, heli-copter pads, general built forms that would alienate general park land activities. If changes were to be made, we think a new zone classification should be applied that would preserve the nature of the park lands and at the same time, deal with a specific need, provided that need had over whelming public approval for its implimentation.

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proponent plansasubmissions@sa.gov.au
email:

Georgia de Lacy

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Georgia

Family name: de Lacy

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I'm very concerned about the potential re zoning of the Adelaide parklands. The old trees along the riverbank play a vital role in our city. They provide shade, clean air, beauty and much needed habitats for birds, koalas, lizards, helpful pollinators and more. Biodiversity is so important to our city, particularly as we face a changing climate. We don't want our city to be barren and ugly! We don't want another Melbourne riverbank precinct. Adelaide is known for its park lands. Why destroy that? Some times decisions shouldn't come down to money, which let's be honest, is the real reason that projects like this go ahead.

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Georgia Meros (Australia ICOMOS)

Dear Madam or Sir,

Please find attached a letter regarding Australia ICOMOS Position Paper on the Adelaide Park Lands and City Layout National Heritage Place including comments on the Riverbank Precinct Code Amendment 2021.

Regards,

Georgia

Georgia Meros
Secretariat Executive Officer

Australia ICOMOS
Faculty of Arts & Education
Deakin University
221 Burwood Highway
Burwood, Victoria 3125
Ph: 61 3 9251 7131
Email: austicomos@deakin.edu.au
www.icomos.org/australia

Australia ICOMOS Secretariat
Faculty of Arts & Education
Deakin University
221 Burwood Highway
Burwood VIC 3125
ph: +61 3 9251 7131
e: austicomos@deakin.edu.au
w: www.icomos.org/australia

18 October 2021

Code Amendment Team
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

By email: plansasubmissions@sa.gov.au

Dear Madam or Sir

**Australia ICOMOS Position Paper on the
Adelaide Park Lands and City Layout National Heritage Place
including comments on the Riverbank Precinct Code Amendment 2021**

On behalf of Australia ICOMOS I write to provide comments on the Riverbank Precinct Code Amendment 2021, as attached. ICOMOS – the International Council on Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an official Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 750 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia, which provides us with an exceptional opportunity to see best-practice internationally. We have a particular interest in Australia's World and National Heritage places.

In this case, we are focused on the effective protection and management of the Adelaide Park Lands and City Layout as a National Heritage place.

As noted in our submission, Australia ICOMOS is opposed to implementation of the Code amendment while more fundamental issues need to be addressed. Accordingly, we make the following recommendations.

1. The Code amendment process is deferred until a range of fundamental issues are addressed regarding the future protection and management of the park lands.
2. Kaurna consultation is undertaken as part of any future proposed Code amendment affecting the Adelaide Park Lands.
3. An analysis be undertaken to establish the carrying capacity for the park lands which defines the extent and character of sympathetic development consistent with the protection of National Heritage values.
4. Consideration be given to undertaking a strategic assessment under the EPBC Act, as a higher level strategic planning process for the National Heritage place. This might include the carrying capacity analysis recommended above.
5. A review should be undertaken to establish how City, State and Commonwealth systems can achieve greater coherence in the protection and management of the National Heritage place, including with regard to heritage impact assessment. This would assist in identifying owner and proponent obligations under the EPBC Act.
6. Heritage impact assessments prepared by relevant heritage experts for proposed works in or adjacent to the National Heritage place should be prepared and made publicly available at an early stage to enable public scrutiny prior to development approval being granted.

7. A conservation management plan for the National Heritage place should be prepared, consistent with the National Heritage management principles and other requirements under the EPBC Act.
8. A system should be developed to ensure the integrated management of the National Heritage place amongst the various land managers within the area, and this should be documented in the conservation management plan.

We would be willing to provide further comments or clarifications if requested.

Yours sincerely

Helen Lardner
President

Australia ICOMOS Secretariat
Faculty of Arts & Education
Deakin University
221 Burwood Highway
Burwood VIC 3125
ph: +61 3 9251 7131
e: austicomos@deakin.edu.au
w: www.icomos.org/australia

Park Lands and City Layout National Heritage Place including comments on the Riverbank Precinct Code Amendment 2021

12 October 2021

About Australia ICOMOS

ICOMOS – the International Council on Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an official Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 750 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia, which provides us with an exceptional opportunity to see bestpractice internationally. We have a particular interest in Australia's World and National Heritage places.

Background to the Adelaide Park Lands and City Layout National Heritage Place, and the Riverbank Precinct Code Amendment 2021

This paper has been prepared to address a range of long-term issues with the effective protection and management of the Adelaide Park Lands and City Layout National Heritage place. It also provides a response to the current Riverbank Precinct Code Amendment (2021).

In 2008 the Adelaide Park Lands and City Layout was entered in the National Heritage List maintained under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Its National Heritage values include,

The Adelaide Park Lands and City Layout is a significant example of early colonial planning which has retained key elements of its historical layout for over one hundred and seventy years...

The Adelaide Plan... reflected new town planning conventions and contemporary ideas about the provision of common or reserved land for its aesthetic qualities, public health and recreation...

The key elements of the Plan remain substantially intact, including the layout of the two major city areas, separated by the meandering Torrens River, the encircling Park Lands, the six town squares, the gardens and the grid pattern of major and minor roads.

The Park Lands, in particular, are significant for the longevity of protection and conservation and have high social value to South Australians who regard them as fundamental to the character and ambience of the city of Adelaide.

The national significance of the Adelaide Park Lands and City Layout lies in its design excellence. The Adelaide Plan is regarded as a masterwork of urban design, a grand example of colonial urban planning... Features within the Park Lands area included a hospital, Government House, a school, barracks, a store house, a market and a botanic garden and roads.

The tree planting designed and implemented since the 1850s and the living plant collection of the Park Lands, particularly within the Adelaide Botanic Gardens are outstanding features. The encircling Park Lands provide for health and recreation for the inhabitants while setting the city limits and preventing speculative land sales on the perimeter.

The emphasis on public health, amenity and aesthetic qualities through civic design and provision of public spaces were to have an influence on the Garden City Movement, one of the most significant urban planning initiatives of the twentieth century... (Adelaide Park Lands and City Layout, National Heritage place record 105758)

A copy of the full official values and boundary plan are provided at Appendix A.

Many National Heritage places have a conservation or heritage management plan prepared to guide the management and conservation of the place. The 2013-2018 review of the National Heritage List (Department of the Environment and Energy 2019) noted that the management arrangements in place for the National Heritage listing for the park lands were the “2009 Management Strategy and development plans”. However, neither the current “Adelaide Park Lands Management Strategy 2015-2025”, nor the current Planning and Design Code (based on the former Adelaide City Development Plan) appear to be consistent with National Heritage management principles. These documents were never prepared to specifically address the management of the park lands’ diverse National Heritage values.

The Planning and Design Code (the Code) came into effect in Adelaide in 2021, replacing all Development Plans. The Code has several overlays that provide policy for heritage and historic places and areas, including for State Heritage Places, State Heritage Areas, Local Heritage Places and Historic Areas. There is no overlay for National Heritage places to help achieve an integrated approach, and no provisions in the SA planning system to identify if works are within the boundary of a National Heritage place, or to consider potential impacts on National Heritage places.

In September 2019 the South Australian Heritage Council considered the potential listing of the “Adelaide Park Lands, Squares and City Layout” as a State Heritage Area (SHA). It is understood that Heritage Standards will be prepared under the Planning and Design Code for the proposed SHA.

The history of the original area of park lands is complex, especially along North Terrace, where a series of developments have taken place over time. These have included railway facilities, a university and institute of technology, and a hospital from the 19th and early 20th centuries. Later commercial, entertainment and sporting facilities have also been developed or re-developed, and more recently a new hospital constructed. A major high-rise building is to be built behind the Adelaide

Festival Centre. It is noted that many of these facilities are outside of the National Heritage place, although within the Adelaide Park Lands Plan as defined under the *Adelaide Park Lands Act 2005*, and within the setting of the National Heritage place.

Overview of the Riverbank Precinct Code Amendment

This amendment is proposed for the following reasons,

The State Government is progressing initiatives of State significance in the Riverbank precinct including the development of the proposed new Women’s and Children’s Hospital (nWCH). These initiatives are part of the State Government’s wider vision for the Riverbank precinct as a premier health, sporting, entertainment, education, and cultural boulevard and have been the subject of ongoing strategic consideration. (Plan SA, Riverbank Precinct Code, Amendment, draft for consultation, 2021, p. 6).

The amendment partly relates to the National Heritage listed area, as well as other areas which are part of the Adelaide Park Lands Plan as defined under the *Adelaide Park Lands Act 2005*. The total area of park lands impacted by the amendment is approximately 70 hectares. The amendment will apparently enable several substantial developments within the National Heritage listed park lands boundary, including:

- a multi-storey carpark and access road for the proposed Women's and Children's Hospital;
- a major entertainment building;
- expansion of a commercial innovation precinct; and
- a range of community, cultural, tourism, shop and licensed premises located 'on-water and offwater' on the northern banks of the Karrawirra Parri/River Torrens.

These are the current proposals, and it seems likely additional future developments may arise which will be facilitated by the Code amendment, as new land uses include:

- arena;
- community centre;
- consulting room;
- convention centre;
- educational establishment;
- entertainment venue;
- helicopter landing facility;
- hospital;
- hotel;
- licensed premises;
- land division;
- light industry;
- office;
- pre-school;
- shop;
- serviced apartments; and
- tourist accommodation.

In terms of built form, the Code amendment will allow 15-20 storey buildings and 53-71 metre building heights.

The Code amendment will also allow for land subdivisions within the National Heritage place and public notification will no longer be required for any development application except the demolition of a State or Local Heritage Place.

Additionally, a number of current uses that support the National Heritage values will be removed by the proposed Code amendment. These include a range of open space, recreation and sporting activities, as well as special events.

Key General Overarching Issues for the Adelaide Park Lands and City Layout

The key issues affecting the park lands include:

- incremental and substantial development pressure within and adjacent to the National Heritage place, involving major developments in the past, current proposals and possible future developments that may have a cumulative adverse impact on the National Heritage values;

- the development of major buildings and roadways which erode the open and landscape qualities of the park lands, including the meaningful connectivity of the encircling park lands in the vicinity of Bonython Park, preclude the restoration of the park lands, impact on the grid layout, or which are unsympathetic in the setting of the park lands, any of which may adversely impact on the National Heritage values, including its social values; and

- the inclusion of uses which are not consistent with the general character of the park lands, or create an imbalance of uses which may affect the overall landscape character and the National Heritage values.

Of great concern is that the proposed Code amendment is only the latest example of development pressure on the park lands. There is no established carrying capacity for the park lands that defines the extent and character of sympathetic development, and such pressure will continue to arise over time.

It is understood that the proposed Code amendment may not be a matter (an action) that can be considered under the EPBC Act, which is focused on specific projects. In the latter case, the normal process involves undertaking a self-assessment (heritage impact assessment) of a particular action to determine if it is likely to have a “significant impact” on National Heritage values. The proponent determines if a referral under the EPBC Act is required.

An “action” is defined in the EPBC Act as: a project, a development, an undertaking, an activity or a series of activities, or an alteration of any of these things (section 523). Actions include, but are not limited to: construction, expansion, alteration or demolition of buildings, structures, infrastructure or facilities, earthworks and vegetation clearing. However, government authorisations for another person to take an action are not actions (section 524).

Additional concerns include:

- there is uncertainty in relation to the proposed approvals process following rezoning, noting the apparent overall lack of coherence between City planning, State planning legislation and policy, and National Heritage considerations under the EPBC Act, and heritage impact assessment in relation to actions within the boundary of or impacting upon the setting of the National Heritage place and State Heritage Places;

- there is no conservation management plan for the National Heritage place, consistent with the National Heritage management principles and other requirements under the EPBC Act;

- there appear to be nine land managers for the park lands National Heritage place, it is unclear if they all have appropriate policies and processes to protect and manage the place, that they understand their obligations under the EPBC Act, and that these management systems provide for an integrated outcome; and

- heritage impact assessments for proposed works in or adjacent to the National Heritage place must be prepared by relevant heritage experts, they are not always publicly available, or available at an early stage to enable public scrutiny prior to development approval being granted.

Specific Additional Issues with regard to the Sub-Zones in the Code Amendment

Health Sub-Zone

- Potential adverse impacts on National Heritage park lands, and State Heritage Places or potential places (eg. the olive grove).
- Construction of multi-storey carpark on park lands/loss of or impacts on park lands landscape.

- Permits new building heights up to 15 storeys or 53 metres which would impact on park lands landscape.
- Proposed land uses are inconsistent with park lands landscape

Entertainment Sub-Zone

- Construction of arena on park lands/loss of or impacts on park lands landscape.
- Permits new building heights up to 20 storeys or 71 metres which would impact on park lands landscape
- Proposed land uses are inconsistent with park lands landscape.
- Adverse impacts on Colonel Light's grid layout, which is a key component of the National Heritage listing.

Riverbank Sub-Zone

- Potential impacts on Pinky Flat as a place of significance to the Kaurna community.
- May lead to development on park lands/loss of or impacts on park lands landscape.
- Proposed land and water uses are inconsistent with park lands landscape.

Innovation Sub-Zone

- No valid reason has been offered for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone).
- May lead to development on park lands/loss of or impacts on park lands landscape.
- Proposed land uses are inconsistent with park lands landscape.
- Frome Park/Nellie Raminyemmerin Park cannot be disturbed as it contains a fully authenticated and documented Kaurna Aboriginal burial site listed on the Register of Aboriginal Sites and Objects under the *Aboriginal Heritage Act 1988*. It also contains contaminated material to a depth of 1.5 metres.

Recommendations regarding the Future Protection and Management of the Adelaide Park Lands and City Layout

Given all of this context, Australia ICOMOS is opposed to implementation of the Code amendment while more fundamental issues need to be addressed. Accordingly, Australia ICOMOS makes the following recommendations.

1. The Code amendment process is deferred until a range of fundamental issues are addressed regarding the future protection and management of the park lands.
2. Kaurna consultation is undertaken as part of any future proposed Code amendment affecting the Adelaide Park Lands.
3. An analysis be undertaken to establish the carrying capacity for the park lands which defines the extent and character of sympathetic development consistent with the protection of National Heritage values.
4. Consideration be given to undertaking a strategic assessment under the EPBC Act, as a higher level strategic planning process for the National Heritage place. This might include the carrying capacity analysis recommended above.
5. A review should be undertaken to establish how City, State and Commonwealth systems can achieve greater coherence in the protection and management of the National Heritage place, including with regard to heritage impact assessment. This would assist in identifying owner and proponent obligations under the EPBC Act.
6. Heritage impact assessments prepared by relevant heritage experts for proposed works in or adjacent to the National Heritage place should be prepared and made publicly available at an early stage to enable public scrutiny prior to development approval being granted.

7. A conservation management plan for the National Heritage place should be prepared, consistent with the National Heritage management principles and other requirements under the EPBC Act.
8. A system should be developed to ensure the integrated management of the National Heritage place amongst the various land managers within the area, and this should be documented in the conservation management plan.

Appendix A: Adelaide Park Lands and City Layout – National Heritage values and Boundaries

The Adelaide Park Lands and City Layout was included on the National Heritage List in 2008 and was found to meet six of the eight heritage criteria under the EPBC Regulations.

National Heritage Values

Criterion (a) the place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is the physical expression of the 1837 Adelaide Plan designed and laid out by Colonel William Light. It has endured as a recognisable historical layout for over 170 years retaining the key elements of the plan; encompassing the layout of the two major city areas separated by the Torrens River, the encircling Park Lands, the six town squares, and the grid pattern of major and minor roads. It is substantially intact and reflects Light's design intentions with high integrity.

The Adelaide Park Lands and City Layout is of outstanding importance because it signifies a turning point in the settlement of Australia. It was the first place in Australia to be planned and developed by free settlers, not as a penal settlement or military outpost. The colony of South Australia was established by incorporation as a commercial venture supported by the British Government, based on Edward Wakefield's theory of systematic colonisation. To be commercially successful, there needed to be contained settlement to avoid speculative land sales and this settlement needed to be designed and planned to attract free settlers and to provide them with security of land tenure. The city layout with its grid plan expedited the process of land survey enabling both rapid settlement of land and certainty of title. The wide streets, public squares and generous open spaces provided amenity and the surrounding park lands ensured a defined town boundary while still allowing for public institutional domains. These elements are discernable [sic] today.

The Adelaide Park Lands is also significant for the longevity of its protection and conservation. The Adelaide Municipal Corporation Act (1840) established the city council as the 'conservators' of the city and park lands. The establishment of the Park Lands Preservation Society in 1903, along with successive community organisations marks a continuing pattern in community support for safeguarding the significance of the Park Lands for the Adelaide community.

The Adelaide Plan was highly influential as a model for planning other towns in Australia and overseas. It is acknowledged by town planners and historians as a major influence on the Garden City Planning movement, one of the most important urban planning initiatives.

Criterion (b) the place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth-century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth-century park lands in Australia.

Criterion (d) the place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of: (i) a class of Australia's natural or cultural places; or (ii) a class of Australia's natural or cultural environments.

The Adelaide Park Lands and City Layout is an exemplar of a nineteenth-century planned urban centre. It demonstrates the principal characteristics of a nineteenth century city including a defined boundary, streets in a grid pattern, wide streets, public squares, spacious rectangular blocks and expansive public open space for commons and public domains. The expression of these features with their generous open space reflects the early theories and ideas of the Garden City movement of an urban area set in publicly accessible open space with plantings, gardens, designed areas and open bushland.

Criterion (f) the place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.

Adelaide Park Lands and City Layout is regarded throughout Australia and the world as a masterwork of urban design. Elements of the Adelaide Plan that contribute to the design excellence are the use of the encircling park lands to define the boundary of the development of the city and to provide for health, public access, sport, recreation and public institutional domains, thereby meeting both economic and social requirements. Designing the city layout to respond to the topography was highly innovative for its time with the northern sections of the city located and angled to take advantage of the rising ground while retaining the Torrens River as a feature within the Park Lands. The judicious siting and wide streets maximised views and vistas through the city and Park Lands and from some locations to the Adelaide Hills. The plan features a hierarchy of road widths with a wide dimension to principal routes and terraces and alternating narrow and wide streets in the east-west direction. Light's planning innovation is supported by substantial historical documentation.

The formal organisation, delineation and dedication of the Park Lands space was a pioneering technical achievement of William Light in the Adelaide Plan.

The overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas, formal avenues, plantations, gardens, use of specimen trees, botanically important living plant collections particularly at the Adelaide Botanic Garden and the strategic placement of buildings and statuary in their settings.

The creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills. The civic design of Adelaide was used as a model for founding many other towns in Australia and New Zealand and it is cited in later seminal Garden City planning texts including 'Garden Cities of Tomorrow' by Ebenezer Howard.

Criterion G the place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

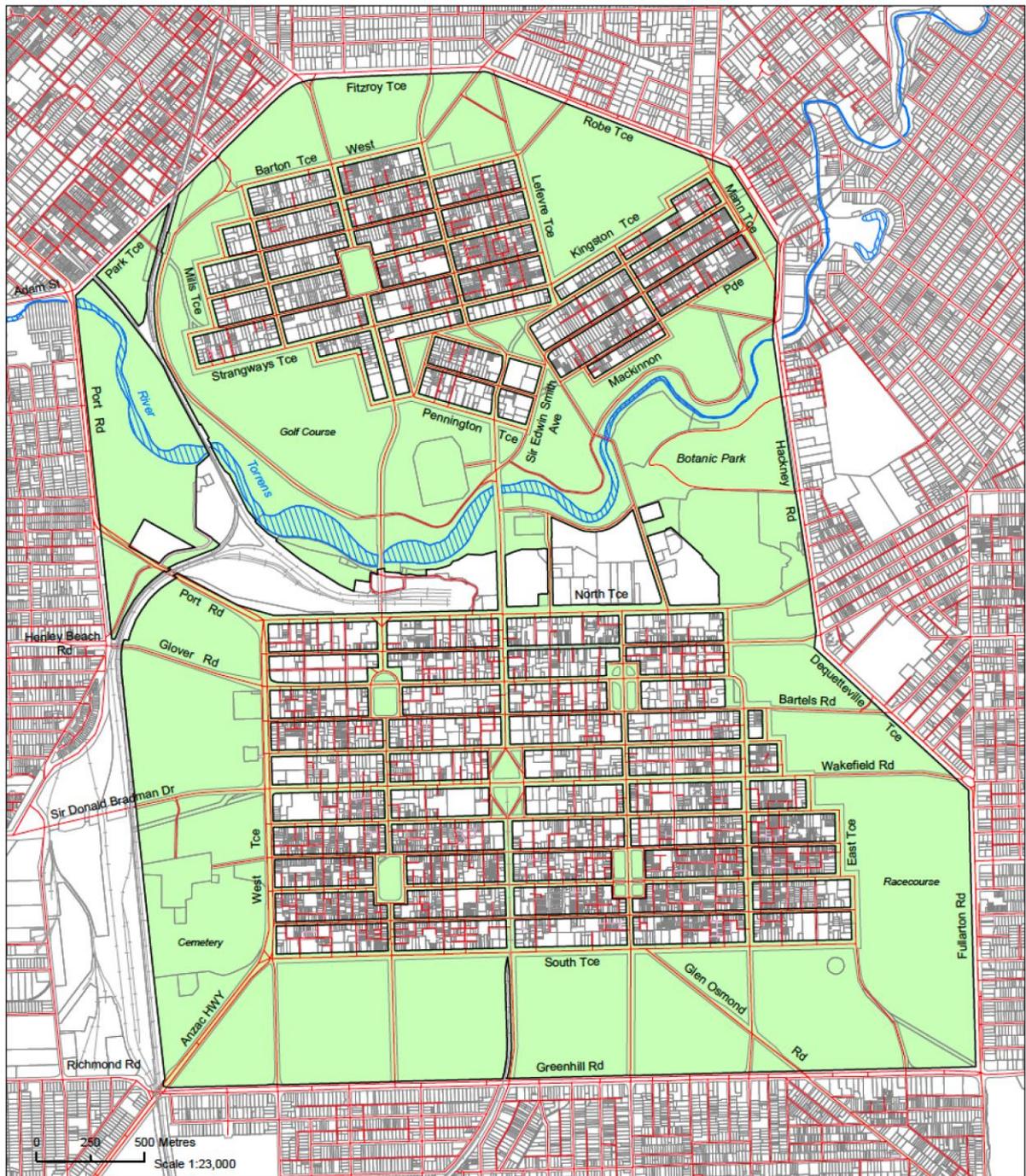
The Adelaide Park Lands has outstanding social value to South Australians who see it as fundamental to the character and ambience of the city. The Park Lands with their recreation areas, sports grounds, gardens and public facilities provide venues for individual and group activities and events, meetings and passive and active recreation. The Park Lands also have significant social value due to the range of important civic, public, and cultural assets and institutions within it.

The present Adelaide Parklands Preservation Society is the latest in a long history of community groups dedicated to protecting the Adelaide Park Lands. These have included the Park Lands Defence Association (1869-87), the Park Lands Preservation League (1903, 1948) and the National Trust of South Australia. The longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands is exceptional.

Criterion H the place has outstanding heritage value to the nation because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history.

Colonel William Light is most famously associated with the plan of Adelaide. He bore the ultimate responsibility, as recorded in his surviving publications and letters.

Boundary Map



<p>LEGEND</p> <p> Listed place</p> <p> Australian Government Department of the Environment, Water, Heritage and the Arts</p>	<p>The Adelaide Park Lands and City Layout</p> <p>National Heritage List</p> <p>Place ID: 105758 File: 3/03/001/0279</p>	<p>Data Sources: Cadastre for Australia (SA) - Cadfile RoadNet Comprehensive - Roads RoadNet Comprehensive - Railways © 2008 MapData Sciences Pty Ltd, PSMA Produced by: Heritage Division Canberra, GDA94, 7/11/2008 © Commonwealth of Australia, 2008.</p>
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Gerasimos Patitsas

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: gerasimos

Family name: patitsas

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: the Adelaide parklands are the most special part of the city of Adelaide, and contribute significantly to its character and the quality of life of its residents. I vehemently oppose any permanent alienation of the parklands. I suggest that every attempt should be made to enhance the natural qualities of the parklands. I also suggest that every attempt should be made to bring more life into the city centre rather than dispersing activities away from it.

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sent to
proponent email: plansasubmissions@sa.gov.au

Gillian Dooley

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Advocacy Organisation

Given name: Gillian

Family name: Dooley

Organisation: History Council of SA

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Official letter from History Council of SA on behalf of its members is attached.

Attachment: hcsa_open_letter_riverbank_rezoning.pdf, type application/pdf, 364.4 KB

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sent to proponent email: plansasubmissions@sa.gov.au

OPEN LETTER TO THE PREMIER:
OBJECTION TO PROPOSED REZONING OF ADELAIDE CITY PARK LANDS

26 October 2021

The Honourable Steven Marshall MP
Premier of South Australia
Parliament House
North Terrace
Adelaide, SA, 5000
Dear Premier,

The History Council of South Australia (HCSA) is an independent, non-government body whose membership is comprised of individual members, cultural, academic and government institutions, local libraries, museums and historical societies. On behalf of our members, the HCSA opposes the South Australian Government's proposal to change the zoning of north/west sections of the City of Adelaide Park Lands for uses other than open space and community recreational facilities.

HISTORY AND HERITAGE: The Adelaide Park Lands are an integral component of our state's heritage. In his 1837 survey, Colonel William Light included 2,300 acres (930 hectares) of land surrounding the city to be reserved from sale and dedicated as parklands for the use and recreation of the citizens. The exception was 9 blocks of land Light specified for use for government buildings and facilities (including government house, a botanic garden, a hospital and a cemetery).

Light's visionary plan is regarded throughout Australia and the world as a masterwork of urban design. It ensured Adelaide had the world's first public park (10 years ahead of the next public park in Merseyside, England). Light's model is recognised by town planners and historians as a major influence on the Garden City planning movement, one of the most important western urban planning initiatives in history.

The Adelaide Park Lands received National Heritage Listing in 2008, and in December 2018, the State Heritage Council recommended them to the Minister for Planning for State Heritage Listing (although progress has been disappointingly slow). Unfortunately, throughout the history of the city, there has been an ongoing battle to protect the Park Lands from built development.

THE PROPOSED REZONING: In 2021, 760 hectares of Parklands – about 80% – are under the custodianship of the City of Adelaide Council and are mostly open space, with the South Australia Government the custodian of the remaining 20% (comprising government buildings and facilities and the (mostly open space) Adelaide Botanic Gardens).

The highly controversial Planning and Design Code, introduced this year (2021), designates the 80% as the Adelaide Park Lands Zone. The remaining 20% of the Parklands is divided into different Zones and Subzones with variously named Precincts designated by the Government.

The HCSA objects to the Government's proposal to acquire the below listed land for

Government purposes, and to rezone it for uses other than open space and community recreational facilities.

The Park Lands proposed for acquisition for Government purposes (stated in Attachment A of the consultation paper) include:

- rezoning land at Port Road, North Terrace, War Memorial Drive and Gaol Road from Adelaide Park Lands Zone to City Riverbank Zone and apply the Health Subzone. The intention being to extend the designated medical precinct to Parklands on which the old gaol, police barracks and historical olive grove sit to service the proposed Women's and Children's Hospital. The Government proposes converting the State heritage listed Old Adelaide Gaol and Police Barracks into biomedical and ancillary health services.
- Rezoning land at Montefiore Road, North Terrace and Festival Drive from Adelaide Park Lands Zone to City Riverbank Zone and apply the Entertainment Subzone. The intention being to extend the designated entertainment precinct to the west of the Morphet Street bridge and claim this section of the Parklands for a sports arena.
- Rezoning land around Frome Road from Adelaide Park Lands Zone to City Riverbank Zone and apply the Innovation Subzone. The intention being to extend the designated innovation precinct by rezoning a small portion of the Parkland adjacent to the Botanic High School.
- To apply the new Riverbank Subzone to land around War Memorial Drive, Victoria Drive, King William Road, Montefiore Road and Park Terrace which is currently in the Adelaide Park Lands Zone, the intention being to provide opportunities for a riverbank or waterfront precinct, and to sublet sub-let the riverbank to commercial activities, such as retail and hospitality, and allow for low-rise buildings (up to 2 stories) on the riverbank to house these commercial activities.

The HCSA strongly objects to each of these proposals that will decrease the area of the green belt encompassing the city.

We argue that, as a hallmark of the city's original design, which has maintained elements of its historical layout for more than 170 years, the Adelaide Park Lands are of great historical and heritage significance. They continue to be a unique and highly valued aspect of our wonderful city and are important to the identity of South Australia. We also suggest that, as there is little Kauria land in the Adelaide area that has not been built over or bitumenised, it is disrespectful to build over the few remaining natural areas. In addition, global warming is increasingly recognised as an eminent threat to city dwellers' lifestyles; planners recognise that Green areas decrease the temperature of cities and assist in the retention of water and should be protected and expanded.

The HCSA draws attention to the health, environmental and economic benefits that green, treed and community accessible spaces provide. They also form a major aspect of Adelaide's unique character which appeals not only to residents but to visitors from interstate and overseas.

Accordingly, the HCSA asks the Government to reconsider this proposed rezoning of the Parklands.

Yours faithfully,

Dr Gillian Dooley
President,
History Council of South Australia

Gillian Saunders

For the planning team,

I write regarding the proposed rezoning of the northern parklands, and to describe my views on how this may have a long term impact to members of the community and both frequent and casual parklands users.

I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not treated as vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal will have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

My view is this should remain green, open and as much as possible, accessible to all members of the public for enjoyment, recreation and as a genuinely shared resource for the community.

Thankyou for taking the time to consider my feedback.

Gillian Saunders

[REDACTED]
[REDACTED]

Glenyss Steedman

To whom it may concern

Please consider that this move is no more than common theft from the people of SA. The parklands are our property placed in the care of the Adelaide City Council. The Council has objected and so do I. Very strongly.

There is other land available for purchase or acquisition in the vicinity. Please use this option - not the option of irresponsible theft of public property.

Without the parklands, Adelaide would be disadvantaged - environmentally and visually. Open space is an increasingly rare amenity, not available in many cities. Your responsibility is to preserve this, not destroy it. That is why we vote for you. Not to behave like property developers. Perhaps our planning Minister who is, I believe, a property developer, should remember that.

Yours sincerely

Glenyss Steedman

Gloria Rainford

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: gloria

Family name: rainford

Organisation: Nil

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Keep the area as it is. Once it has been built on it is gone forever. Never to be returned to open space. There are enough struggling cafes pubs and restaurants already. Once again it seems another "visionary" seems intent on building over our parklands and destroying our dwindling green space.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Gordon Ure

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Gordon

Family name: Ure

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I am strongly opposed to the proposed amendments to the Riverbank Precinct Code Amendment. The riverbank area proposed for development was allocated by our forefathers as protected recreation lands and is currently enjoyed as such by many. The current boathouses form an excellent vista in contrast to the conference building developments.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Greg Biddolph

I am 100 % opposed to any further infringement on Adelaide's unique city parkland.

These proposals should not / must not go ahead.

Do not take away ny more of Adelaide's unique city parks to make us the same as any other city,
keep us unique

Greg Biddolph.

████████████████████

████████████████

Greg Lamey

"I STRONGLY reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Greg Lamey

Cudlee Creek

Greg Packer

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Greg

Family name: Packer

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Keep your hands off our (the people of SA) parklands. You have no right to touch places that do not belong to you. This government is fixated on destroying the beautiful open spaces, parklands, and houses that make SA so unique and a fantastic place to reside. I always have been a Liberal voter but this Liberal Government has deliberately set about to destroy our culture. I will not vote for them this year. HANDS OFF OUR PARKLANDS.

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sent to
proponent email: plansasubmissions@sa.gov.au

Gregory Crawford

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Gregory

Family name: Crawford

Organisation:

Email address:

[REDACTED]

Phone

number:

[REDACTED]

Comments: I oppose any rezoning that will give the opportunity for commercial activities, even "small" scale along the river bank particularly opposite the Entertainment Centre and in front of the oval and into Pinkie Flat. We do not want a Southbank type complex. Any expansion of the new school site must be resisted as well

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sent to

proponent plansasubmissions@sa.gov.au

email:

Gunta Groves

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Gunta

Family name: Groves

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I object to the proposed code amendment and the subsequent rezoning proposal. I don't understand how a Liberal Government, approaching a State election with a decreasing majority and electorates in jeopardy, can be contemplating one of the biggest Park Land grabs in history. I can only imagine that there is a desire to lose government to get back to a more comfortable existence in Opposition benches. The proposal to 'rezone' Park Lands to enable hard-surface and built development is not acceptable and, under current legislation, not legal. The Adelaide Park Lands Act 2005 requires the State Government and the City Council to 'protect and enhance the Adelaide Park Lands'. The code amendment and rezoning proposals contradict this requirement and one can only speculate about the reasons. I know from my past experience that the State Government and commercial developers perceive the Adelaide Park Lands as cheap options for their grand visions. I also know from my past experience and the way this 'public engagement' has been organised that submissions against the Liberal Government's proposals will have no influence on the outcome. It's a pity because, inevitably, the proponents will reap what they sow, and I don't particularly want to see a Labor government at the helm in 2022. We should all remember that the Adelaide Park Lands aren't cheap land, they're priceless.

sent to
proponent
email: plansasubmissions@sa.gov.au

Hannah Beinke

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Hannah

Family name: Beinke

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please do not go ahead with this project. The term that worries me is "further adaptive use" and you gave Lot 14 as an example. That does not fill me with confidence about the future of the Old Adelaide Gaol and Police Barracks. The SA Government's track record with our historical buildings for the sake of progress leaves something to be desired. As a visitor to the Gaol it fills me with great concern that this Government can take something that has been around since before everyone that is planning this project was born and destroy it for the sake of progress. Once it's gone, it's too late, you can't get it back. Please stop this.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Heather Moyes

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Heather

Family name: Moyes

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

Dear Ms Chapman and the Chief Executive, Attorney-General's Department, I appeal to your sense of what is right, and your long-term reputation and legacy, as well as to the conservative ideals of your party. Conservation of the traditional and old ways, a respect for considered rather than radical change has been the party's strength. The moves on the Adelaide Parkland may be seen as insignificant by some, but the park has suffered many insignificant blows and will be tragically diminished if the proposal to rezone 20% of the area goes ahead. Overtime we have lost much, and it is your name and that of the Liberal party, that will be associated with the eventual destruction of our heritage if you continue. The protection of the Adelaide Parklands is not a socialist project. The Parklands are our common heritage and something to be proud of. To protect them is to stand up for the traditions of our forefathers. Do not let economics drive the politics of the day. Our city's amenity was foremost in the mind of Colonel Light when he planned a city with Parklands for all. Before Adelaide's establishment in 1837, the only Parks that existed anywhere in the world were owned by royalty, or private, wealthy landowners. I urge you, do not be a party to the destruction of this unique feature of our cityscape. Its loss will be a loss for all of Adelaide and will be a permanent disgrace. Kind regards, Heather Moyes

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sent to
proponent email: plansasubmissions@sa.gov.au

Heather Nott

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Heather

Family name: Nott

Organisation: N/A

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am not in favor of high rise on the River Torrens. I believe it is out of keeping with the surrounding homes and landscape. It would be unsightly from a distance. I would pity the surrounding homes and neighborhood families.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Heather Smith

i am completely opposed to the re-zoning of any part of the Adelaide Park Lands.

The parklands are the secret key to Adelaide's success as a city. Keeping as much land as possible as parkland is essential. John Hill promised that the RAH site would be returned to parklands and you are renegeing on that promise. Every little change in zoning, every building, undermines the great asset we have. And it never seems to go in the opposite direction. Ie toward parkland and away from development.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

thank you for the opportunity to comment Heather Smith

██████████
████████████████████

Heather Smith

I reject the Government's so-called "vision" for the Adelaide Park Lands.

Open Green Public Spaces do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage.

I have particular concerns regarding space for exercise, trees for air quality, habitat for animals, green space for mental health, given the enormous amount of high rise accommodation allowed in the city now. That has to be balanced by protecting our green 'heritage'.

Two hospitals on the southern side of the Torrens need to be balanced by a peaceful green environment on the northern side. Please leave Pinky flat alone.

Yours sincerely

Heather Smith

Helen Mitchard

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please don't do this.

Helen Mitchard
Urrbrae

Hilary Rowe

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please allow future generations to enjoy the natural environs of the river banks and parklands. If I wish to have endless cafes and shops I can go to Melbourne's South Bank. What is lacking is existing restaurants staying open later to allow post entertainment socialising.

Hilary Rowe

Hilda and Ron Smith

**WE STRONGLY OPPOSE REZONING OF ADELAIDE PARKLANDS/RIVERBANK
PRECINCT.**

Below is a letter written by Professor Chris Daniels, Green Adelaide presiding member - published in The Advertiser.

*I am delighted Green Adelaide is leading the drive for **Adelaide to become the second National Park City in the world after London.***

This is an exciting global initiative designed to inspire action to improve the wellbeing of cities, people and places.

'It's about bringing the whole community, business and government together on a journey to achieve healthier and greener cities . And to grow greater connections with nature. We want this movement to include the whole of metropolitan Adelaide, geographically and socially. We want the natural jewels from across this entire landscape to be treasured.

A healthier city would have a diversity of green places. It also includes innovations to greening and cooling by bringing our amazing plant and animal life into small, and sometimes difficult, spaces such as balconies, roofs and walls. We know we can make cities a great deal healthier and more resilient in the face of a changing climate. And provide better homes for ourselves and the wildlife around us.

There is a long way to go to make it all happen. But the vision of what we can achieve together is what drives this.

PROFESSOR CHRIS DANIELS,

Green Adelaide presiding member

We believe the letter above says it all.

However, we can add our personal perspective :

Adelaide has a long way to go to achieve a national park status and laying concrete over existing parklands is not the way to achieve this objective. There is much more to life than yet more buildings and once the land is gone it is gone for good. There is no price that can compensate for the loss of green space.

London: we have walked through London's parks several times over the years and marvelled at the diversity, the many people enjoying activities - walking, jogging,

cycling, groups of people exercising, children playing, paddling in the Princess Diana's water feature - this, in a city of eight million plus people plus an equal number of visitors annually.

New York City: Central Park - another example of a well used facility.

Singapore: excellent botanic gardens and parks.

All of the above parks are a joy to visit with their variety of plants, trees, bird and animal life and are well worth a visit.

Hilda and Ron Smith

Hodges and Linkevics Families

TWIMC : We want to add our voice to the thousands of South Australians who are absolutely aghast that any government would allow our unique Parklands to be “white-anted” bit by bit, for commercial development.

If ever a city needed to protect this wonderful green space, as the planet warms up, it is now.

Colonel William Light set down a wonderful legacy for the people of Adelaide and to think that a government of politicians with no respect for history or heritage, would seek to allow developers to make commercial gains from this, is unconscionable and absolutely unacceptable.

It is clear to most people that the planning and design codes were altered to suit developers and shut out public consultation ? We don't know why we are bothering.

How much of this pressure is coming from foreign developers ? They ruin their own countries then want to come here and ruin ours, for greed and profits, and they are getting away with it ? It's disgusting !

The Parklands are treasured by South Australians, and the fact that the aboriginal original owners have just been left out of any discussions, is a damn disgrace ! Where's the respect ??? Roll on next election !

The Hodges and Linkevics families Birdwood 5234

Holly Taylor

To whom it may concern

I wish to register my disapproval of the proposed re-zoning of any part of the beautiful and famed Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks.

Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world and it should be valued as such, not sacrificed as if it were merely vacant development sites. Part of the appeal of Adelaide is our urban parklands.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource. Once it is gone this treasure can never be replaced.

Sincerely
Holly Taylor

██████████
██████████

Ian Buckland

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ian

Family name: Buckland

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Due to ongoing efforts to monetise and commercialise more and more of our world heritage worthy Adelaide Parklands, I oppose any changes to any legislation which enables building of any kind (apart from limited recreation or sport activity) on any of the remaining Parklands areas. There is constant pressure from commercial forces to stop more tree cover from being achieved (Victoria park) or to actually remove old established trees from our Parkland (Adelaide Oval area). This constant eating away at our precious Parklands has got to be stopped.

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sent to proponent email: plansasubmissions@sa.gov.au

Ian Gibbins

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ian

Family name: Gibbins

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: The suggest code amendment will allow the destruction of the very amenity it supposedly seeks to promote: namely, the open space, clear sight lines, natural beauty and restorative function of the riverside parklands. While there is potentially room for suitable development on the southern bank associated with the health and medical precinct, the northern bank, including Pinky Flat, and the southern bank east of Morphett St must not be subjected to more permanent building. We should not be trying to emulate the hectic commercially-driven riverbanks of Melbourne or Brisbane, but focus on creating open spaces that nourish the well-being of human and non-human visitors alike.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Ian Horne (Australian Hotels Association (SA))

Good Afternoon

Please find attached the AHA|SA response in regards to the *Adelaide Riverbank Precinct Code Amendment* for your consideration.

Kind Regards

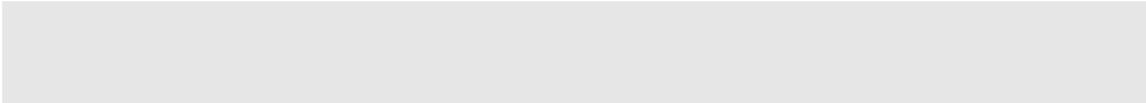
Ian Horne

General Manager/CEO

Australian Hotels Association (SA)

D (08) 8100 2410 | **T** (08) 8232 4525 | **M** 0437 298 258 | **F** (08) 8232 4979

PO Box 3092 Rundle Mall SA 5000 | ihorne@ahasa.asn.au | ahasa.com.au



25 October 2021

Attention: Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
ADELAIDE SA 5001

By email: plansasubmissions@sa.gov.au

RE: RIVERBANK PRECINCT CODE AMENDMENT

The Australian Hotels Association (SA Branch) (AHA|SA) welcomes the opportunity to comment on the South Australian Government's proposal to rezone the Riverbank Precinct.

The AHA|SA understands that the State Government is progressing the initiatives outlined in its *Engagement Plan – Riverbank Precinct Code Amendment* as part of the Government's wider vision for the Riverbank Precinct as a premier health, entertainment and cultural boulevard.

Furthermore, that in order to achieve this wider vision, the Minister for Planning and Local Government has approved the initiation of a Code Amendment in accordance with section 73(2)(b) of the *Planning Development and Infrastructure Act 2016* (the Act). It is noted that the current consultation and associated review is being undertaken to ensure that the current proposed zoning and policy is appropriate and provides the strategic framework to guide future development.

The proposed Code Amendment will deliver a range of key objectives for the riverbank precinct including (and relevant to the AHA|SA's members) improved accessibility and connectivity into and throughout the precinct; appropriate entertainment related land uses north of the railway line, linking to the Convention Centre; and greater activation of the riverbank between the Torrens Weir and Kintore Avenue.

More particularly, it is noted that the draft Code Amendment proposes key changes, which have the potential to impact upon the AHA|SA's members, as follows:

- Rezone land west of Montefiore Road from Adelaide Park Lands Zone to City Riverbank Zone (Entertainment Subzone) and a portion of land already in City Riverbank Zone from Health Subzone to Entertainment Subzone, which will support the development of entertainment related uses, such as an arena; and
- Apply a new Riverbank Subzone in the Adelaide Park Lands Zone to the southern and northern side of the River Torrens between Kintore Avenue and the Torrens Weir to accommodate small scale development such as cafes and shops (both on-water and off-water) that contributes to the activation of the riverfront.

The AHA|SA has previously expressed its support in broad terms for the Riverbank arena proposal. A multipurpose arena will undoubtedly be a huge drawcard, enticing international and interstate acts to perform in Adelaide more often. Such an arena will also give South Australia

an opportunity to win bids for national and international conferences, that require seating capacity well in excess of what current facilities can provide.

The AHA|SA supports the rezoning of land that will allow for the development of a multipurpose Riverbank arena. Development such as this is an essential part of ensuring that South Australia can provide for future business opportunities, not just in sporting areas, but particularly in entertainment and conferences.

An arena that promises to attract 825,000 visitors each year will help to grow the tourism industry, benefiting the hotel and accommodation sector, both in Adelaide and the regions. The AHA|SA is however concerned that these economic benefits will not flow appropriately if new cafes and restaurants are allowed to be developed within the Riverbank precinct. The current policy proposal advocates initiatives that will “activate” the riverfront - but at what cost to South Australia’s existing hospitality providers?

There are currently 841 liquor licence holders (across all categories) within the CBD and North Adelaide, who are currently struggling to keep their doors open and provide employment for South Australians, amid ongoing uncertainty. There are a further 30 licences which are currently suspended. Over the past two years, South Australia’s pubs, clubs and restaurants have experienced some of the toughest trading conditions ever seen. Our industry was amongst the first affected by COVID-19, continues to be amongst the hardest hit, and suffers from ongoing uncertainty regarding restrictions, the re-opening of borders and the still looming threat of further lockdowns.

In an environment where net migration to South Australia fell from 16,630 in 2019 to 4,410 last year¹, the prospect of additional food and beverage outlets within the CBD is cause for concern and requires serious consideration with regard to the impact this will have on businesses outside of the riverbank precinct. In particular, that the broader economic benefits of the Riverbank arena will be lost if patrons are not encouraged to look beyond the riverbank precinct for hospitality offerings – that is former patrons of pre-existing CBD venues are simply displaced to the Riverbank precinct.

The AHA|SA is of course supportive of the creation of vibrant, dynamic hospitality precincts, but is concerned that the current economic climate, coupled with ongoing low population growth, does not support the proposal for additional food and beverage offerings in the riverbank precinct at this time. In the short term, Government resources would be better directed towards reviving the existing hospitality sector, across the CBD, before adding more competition to the industry.

With regard to the commercialisation of Pinky Flat, we note the recent comments of the Lord Mayor Sandy Verschoor in the media, and take this opportunity to reiterate that pop-up entertainment and dining offerings in this area provide little long term benefit to the hospitality sector, especially with regard to employment and training.

¹ South Australian Centre for Economic Studies – *COVID-19 and Potential Impact on South Australia’s Population*

Finally, the AHA|SA understands the need for some of the parklands to be used for the new Women's and Children's Hospital close to the new Royal Adelaide Hospital and the proposed arena development. However, we have serious reservations about the riverbank precinct being opened up for permanent commercial use, and implore the South Australian Government to reconsider proceeding with this aspect of the Code Amendment proposal for the reasons outlined above.

Thank you for taking the time to consider the above response. Please do not hesitate to contact me directly if you would like to discuss any aspect of the submission.

Yours faithfully

Ian Horne
CEO AHA|SA

Ian Milroy and Barbara Mullan

The proposal to rezone several sections of our unique and valuable Parklands, to permit development and construction of number of major buildings including a Sports Stadium, is completely intolerable and must be rescinded. The proposal also makes provision for a number of commercial entities on the Parklands.

The Parklands already have National Heritage protection, and a proposal for World Heritage status is being developed by the Adelaide City Council and already has the strong support of the State Government's Adelaide Parklands Authority and the Adelaide Parklands Association. And yet State Heritage protection, despite numerous submissions for it since 2011, has not been provided.

It is outrageous that our State government should seek to wreck large parts of the Parklands, which were first established by Colonel William Light at the foundation of our City.

Ian Milroy and Barbara Mullan

Ian Radbone

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ian

Family name: Radbone

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: With North Terrace now a no-go zone for cycling, and no separated east-west bike route in the city, we rely heavily on the River Torrens for a safe route east west. My fear is that the "activation" will close this option too, with "cyclist dismount" signs proliferating. Any planning needs to provide a protected bikeway (protected from vehicle traffic, protected from developers) throughout the length of the Park.

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sent to
proponent email: plansasubmissions@sa.gov.au

Ian Rhodes

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ian

Family name: Rhodes

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The only acceptable change is a clear statement that parkland means parkland and that no development is permitted, whatsoever. Furthermore, whoever drafted this rubbish should be dismissed immediately.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Ian Stratford

Do NOT do this please! I am working hard to put more trees back to replace those already cut down. ADELAIDE is noted world wide as one of the few cities left with open spaces. Buildings come and go but open spaces are unique. This is vandalism of the worst sort.

Ingrid Faber

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Ingrid Kellenbach

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, sports stadiums, hotels, apartments, light industry, night clubs, shops, medical suites and more would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. Adelaide has such potential to be a truly 'Green' city however loss of this 70 hectares is just not acceptable and we will potentially lose our bid to be Unesco site.

Our Park Lands should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

I urge you to reconsider this zoning change and protect our precious Park Lands. Adelaide's founders had a vision and our Park Lands which are 4 times the size of New York's Central Park are to be treasured and protected at all costs.

Regards.

Ingrid Kellenbach

Isabella Slevin

To whom it may concern:

Along with the other concerns about this proposal which I'm sure have been raised: heritage, aesthetics, promoting outdoor activities and mental health...I would also like to refer to the aspect of rising temperatures. With the increase in the type of housing and commercial buildings that reduce cooling 'green spaces' in favour of concrete, glass, etc. one of the worrying consequences is the increase in temperature. I only have anecdotal evidence, but our cities and inner suburbs do seem to be getting hotter - reflecting heat and light rather than providing cool and shade.

I ask that this very worrying concern is taken into consideration and that our wonderful Parklands are preserved now and in the future...please do not be the government that promotes 'green energy' but cuts back on green spaces.

Sincerely

Isabella Slevin

Ivan Lloyd

Adelaide, an international garden city - a joke!

Adelaide is among the few capital cities in the world to have bush land within walking distance from the CBD, yet the SA state government doesn't appreciate this unique feature of our city. At the moment there is an obsession by this government to built fancy architecture in one precinct, which is fine if you're utilising degraded land or buildings, but not native trees or public parks. As soon I read of a premier wanting to build a sports stadium, I can't rid my mind of a Banana republic dictatorship building 'sugar for the poor' to prop a tired leadership. Build a stadium if you have to, but not on our parklands, and if the parkland in question is degraded, fix it, not destroy it for concrete and cement. Do I smell corruption?

Have respect for our heritage and our people.

Regards

Ivan Lloyd

Adelaide Hills



Jack O'Dea

Submission one:

With climate change dominating the issues that the world has to deal with and the future for our children and grandchildren.

Your department wants to REDUCE the amount of green space that reduces carbon and provides exercise areas for the residents of Adelaide and the citizens of SA.

What the hell are you thinking that money justifies the end.

I reject the Government's so-called "vision" for the Adelaide Park Lands.

Open Green Public Spaces do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage.

This plan will not auger well for the existing government which is a minority government relying on independents.

Good luck to them at the next election.

Not happy

Jack O'Dea

[REDACTED]

Submission two:

Hi

I am bitterly disappointed that the State Government are attempting to rezone parklands for commercial use.

The parklands are an amazing asset for the people of SA and are not to be traded for some commercial gain.

These parklands should be added to the world heritage listing so that they can never be rezoned or broken up in the future.

One of the reasons that Adelaide has been voted the third most liveable city in the world is because of the parklands.

The current discussion around climate change and keeping all green spaces flies in the face of all those trying to make a better world for their children. What this rezoning does is says future generations don't matter.

PLEASE PLEASE stop this madness for the sake of commercial interests.

Why do sporting venues have to be so close to the city.

Rebuild on existing sites or vacant land the government already holds.. The sports you are discussing do not have a huge following anyway.

The politicians that are making these decisions will most likely not be in politics in 10 years time. What gives you the right to push these unwelcome changes on the SA public.

Is this to be your legacy ???? You will not be viewed in history as being very smart.

The Attorney General has been reported as being involved in decision making to stop a port on KI her home town. How Dows this fit with what she is attempting to do to the city of Adelaide.

STOP THIS MADNESS please.

Yours faithfully

Jack O'Dea

Jacks XS Iphone



Jackson Farrow

"I reject the re-zoning of any part of the Adelaide Park Lands.

Dear Planning Submissions SA,

I have been a resident of Adelaide for nearly 15 years and love my life here. I have a keen interest in nature and green spaces and removing these from the city will be to it's great detriment.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards,

Jackson

Jae Dagleish

Greetings to you all, I hope you are well and recovered from your episode of brain fever.

To try to politely ask what you were thinking is an impossible task.
Every time I think about I become more incensed.

The lack of logic, the lack of respect for the state, the history and the heritage is unendurable.

Firstly, the logic of getting your 'consultants' to do all that work towards a 'World' Heritage listing for our glorious parkland and then annexing part thereof baffles me completely. Did you just ignore the standards to which you will be held, or did you hope to steal a few more acres before the committee met?

Secondly may I enquire who is the wealthy patron of the Adelaide City Council who seems to be driving you towards this foolish endeavour?

Obviously they have never read the old minutes of the council meetings or they would find out they are singing the same song to a different tune. What I am hearing is the same as we heard in the 1960's but they were so staid and stolid that they would not adapt back then and any business that was forward thinking was deemed too adventurous. We said back then that suburban Shopping Centres would take the cream and they did. In case you wonder, "Yes", my mother, father and I all had businesses in the CBD.

Back to our precious heritage. The idea of turning the Riverbank precinct into a cement jungle is repugnant, it is OUR river bank. It is not yours to chop up and allocate to businesses. (BTW have you been to Melbourne's riverbank? It is a miserable area that seems full of small businesses that are sadly failing, and I was there before Covid struck.) No matter what you may think, for every permanent restaurant, cafe, store or building the access to the river front will be limited. the enjoyment of the environment will be gone.

The effect of the temporary structures gets a far different reaction from the walkers and tourists. They bypass a temporary structure, maybe even stop and look but they are aware it will be gone in a week so they ignore that minor irritation. A permanent structure affects them all differently and they tend to do a wider detour if they can, if that is the edge of the water they will not be comfortable.

Permanent structures seem to take ownership of the space around them and the walkers feel like trespassers.

Building a parking station on Parklands is a nonsense. People go there to escape traffic, vehicles and pollution. If you have built a structure without allowance for parking, you wear it. Not the rest of the state. Stop this theft of our park lands.

I no longer have young children, however my memory is good and I know that when I was attending the Children's Hospital the last thing on my mind was the CBD. Visiting, attending clinics or rushing in, in an emergency, the last thing I needed was traffic congestion. I understand building the W&C next to the new RAH might be convenient for access to a couple of machines (maybe?) or the close proximity for pathology results but the anxiety levels of the parents contributes heavily to the recovery of young patients. They need peace and quiet. Siting the W&C hospital close to continuous sirens, heavy traffic, pollution etc. is ludicrous.

Just as a personal opinion - We are not a sporting nation, we have been told we are, it saves anyone finding something else for us to do.

We occasionally like to watch a sport but are not obsessed and certainly do not need a huge new stadium usurping our view and our parklands. You built the Hindmarsh stadium, if it is not big enough then you need to be big enough to admit your mistake. You want something else; build it by the velodrome, easy access and lots of parking. For some inane reason people seem to think the sport mad patrons are wealthy punters who will stop and shop or eat... The majority are simple Jo Blows who travel to their sport; struggle to buy their tickets, bring a snack and then go home. (They even look for the free bus transfer to save driving in to the CBD) They don't have the funds to support all the small businesses praying for a solution.

Sport in the city certainly is not it.

By now you must realise I am against any further incursions onto/into our parklands. You are supposed to be the caretakers, and the protectors, of our heritage. So far you are not doing a very good job of preserving the high standard we expect. It is disgusting that the public only hear about your dastardly deeds via social media, they are all matters that should be discussed with the general public and, at that, statewide. It is not just an Adelaide concern.

The heritage of our state needs preserving, you were all charged with caring for our state, surely you must realise you cannot rebuild history any more than you can return stolen parklands to their pristine condition. Consult with our Botanic Gardens if nature is not your expertise. Stop employing multitudes of expensive consultants when you have staff in your own departments who can help you. If nothing else they will be more honest. Bean counters can make any number do what they/you want.

I sincerely hope reason prevails and these propositions are voted down and this valuable land remains in public domain.

Yours sincerely, Jae Dalgleish

James Baker

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: James

Family name: Baker

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I am not in favour of the Riverbank Precinct Code Amendment, particularly part 4, the active waterbank precinct. I do not support 'the State Government's wider vision for the Riverbank precinct as a premier health, entertainment and cultural boulevard' and therefore the attempt to amend the current zones to align and facilitate this vision. I am not in favour of any zoning changes that facilitate any form of low scale (or any) development along either side of the river bank. The open space of the parklands along our riverbank is a unique characteristic of Adelaide and requires protection not gradual envelopment. Kind regards, James Baker

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sent to
proponent email: plansasubmissions@sa.gov.au

James Daly

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: James

Family name: Daly

Organisation: Private Citizen

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The Adelaide Park Lands need to be protected against alienation. This means that Planners need to respect this basic proposition and plan accordingly. The Riverbank proposed amendment is another grab for park lands on the other side of the river for commercial purposes. Moves to declare Adelaide as a National Park and have the Park Lands as a world heritage site are compromised by these proposed incursions.

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sent to proponent email: plansasubmissions@sa.gov.au

James Hughes

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: James

Family name: Hughes

Organisation: Nil

Email address: [REDACTED]

Phone number [REDACTED]

Comments: Any form of 'development', albeit 'small-scale', on the North side of the river can only be to the detriment of what is a most attractive area used for recreational purposes by many on a daily basis. It should not become necessary to rezone areas to more appropriately reflect existing land use.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Jan Cornish

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: jan

Family name: cornish

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I support the Riverbank Code Amendment for the following reasons: - the Adelaide Riverbank is a highly under-utilised asset acting as a 'walk and cycle through' area (other than when the occasional events are held) - the precinct has the potential to become a centre-piece attracting south Australians and visitors alike into the city. - the precinct could become the major destination (heart) along the River Torrens Linear Park which is metro Adelaides most prized recreational asset stretching from the Hills to the Sea - the Adelaide Oval development has demonstrated how a well developed /world class asset can draw people into the City both from metro Adelaide, interstate and overseas - the Riverbank Precinct Code Amendment will provide the foundation for economic, social, cultural, sporting ventures to thrive, thereby reinvigorating and breathing life to this part of the City - with recent talk of the City of Adelaide CBD dying as a result of COVID and the movement towards working from home in a post COVID world, we will need to rethink the offerings provided by the City (former CBD). The Riverbank Precinct with the planned code amendment will assist the city to move forward beyond COVID and redefine itself. - it will be important that the Code preserves or enhances views, provides for unique design, is environmentally sensitive, allows for events, provides expansive movement corridors and brings the area to life.

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proponent email: plansasubmissions@sa.gov.au

Jane Bailey

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: jane

Family name: bailey

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Hi, I think the riverbanks along the Torrens towards the weir have enough structures on them. Along with Festival Plaza. Any more will look cluttered. I think there are several rather ordinary buildings along the top of Port Road near the Ice Arena which could be acquired, and the old S.A. Brewing site would be fine for a couple more large public buildings or an large arena. The elegant sweeping views across the trees to buildings behind the row of trees (from near the old weir restaurant) are to be kept as is, please. Adelaide should look as gracious as possible. This what Auguste Pelzer would have wished for. Leave Pinky Flat as is too, for the same reasons. Kind regards, Jane

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sent to
proponent plansasubmissions@sa.gov.au
email:

Jane Copeland

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jane

Family name: Copeland

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am opposed to the plans for rezoning the Riverbank for all the reasons that have been so comprehensively articulated by people already in your online guestbook. Adelaide is unique in having so much beautiful open space in the city so why just make it like every other ubiquitous city and build on this open space? It's better for the environment to have green space, particularly in cities and it's better for our mental health. Please stop thinking that if there is open space, it must be commercialised, monetised, activated and built on. We don't want a stadium and more commercial developments along the riverbank. Please just listen to the people and stop being tempted by greedy developers - we have had enough!!!!

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sent to
proponent plansasubmissions@sa.gov.au
email:

Jane Edwards

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jane

Family name: Edwards

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I oppose any rezoning of any area of parkland. The parklands belong to all South Australians and they value them and want them preserved intact for future generations. I hope the government preserves a valuable legacy for all future citizens and maintains the parklands as they currently exist.

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proponent plansasubmissions@sa.gov.au
email:

Jane Lomax-Smith

Submission to Riverbank Precinct Code Amendment Consultation from Jane Lomax-Smith AM
I write as a former City Councillor, Lord Mayor and Minister for the City of Adelaide to express my view that this is the most disgraceful proposition I have seen in the 40 years that I have been involved in public life. Furthermore, it is clearly the most extensive attack on the integrity of our Park Lands since 1836.

The proposition appears to have been developed without acknowledgement of the history of Adelaide, appreciation of the significance of the Adelaide Park Lands or evidence of aboriginal consultation. Furthermore, there is no stated justification for the widespread appropriation of public land.

The key elements of the proposal are the removal of land from any vestige of protection under the previous legislation and denial of the principles of the Adelaide Park Lands Act 2005. The changes will result in open slather for any proposition by people seeking cheap land despite this community asset being priceless and irreplaceable. If allowed, these changes will mean that planning applications will progress to development without public notification or consultation. The changes contemplate an extraordinary list of complying uses. There is to be wide ranging commercial development, residential infill, light industry, and land division.

Land division must surely mean land sales. Land sales of public land? Land sale of a National Heritage Listed asset seeking World Heritage Listing. This alone is inexcusable.

The most disgraceful element of this plan is that without debate in Parliament or adequate public scrutiny or discussion, this proposition can be signed into the planning code by the Minister.

It is being prosecuted at high speed with no political mandate, or social license and does no credit to those involved.

It is hard to believe that this proposal is not also driven by the opportunity to sell land holdings in Thebarton or North Adelaide. However, the metropolitan area has abundant underperforming commercial and industrial assets so that the rush to carve up public land is an unwelcome intervention in property values. What our suburbs lack is open space for recreation and well-being. Not to mention the benefits of additional heat sinks and storm water detention.

Adelaide far from being a generously endowed garden city, has been described as our nation's most park-poor capital city. Adelaide has only 10% of land as public parks, compared with 20% in Melbourne, 40% in Perth and 57% in Sydney. A perhaps surprising comparison is that New York has levels of 27% and London 40%. Policy makers should not be satisfied with the levels in Adelaide, and we would be better served by an aspiration to increase accessible public open space rather than a plan to reduce it.

In my view there is an underlying failure of State Governments and the Health Department to publicly acknowledge their plan to collocate all Health facilities onto North Terrace. A master plan should have been debated and have been developed more than 10 years ago when the North Terrace land between Morphett St and West Terrace could have been designed to accommodate all the requisite health needs, without further Park Lands encroachment.

I believe that the land between Morphett Street bridge the rail lines and the nRAH is incontrovertibly alienated for posterity, and further Park Lands development is not appropriate.

Recognition that this North Terrace land is alienated allows the opportunity to offer some constructive suggestions. I do so in the belief that the Premier and Cabinet were not aware of the details of this proposition, and hope that the situation can be retrieved by them.

Firstly, if the WCH must be relocated and the motive is not a North Adelaide land sale for apartments, then a land swap as achieved in *Royal Children's Hospital (Land) Act 2007* should be enacted. This would demonstrate good faith by a commitment to no associated additional loss of public park land (http://classic.austlii.edu.au/au/legis/vic/consol_act/rcha2007289/)

Some development could happily sit over the rail yards, and could accommodate the transport hub, SA Pathology and some part of the nWCH whilst adaptive reuse might enable greater benefit to be achieved at the SAPOL or Gaol site.

If an additional Arena needs to be built, serious consideration should be given to redevelopment on the land owned by the State at the current Entertainment Centre (or in a metropolitan shopping centre hub)

However, the current proposal to excise land from Adelaide Park Lands protection should be scrapped and the Planning Department instructed that the State Government and the Opposition support the principles of protection and maintenance in the *Adelaide Park Lands Act 2005*, and will not contemplate land division in Adelaide Park Lands

Jane Lomax-Smith AM
27th October 2021



Jane Mitchell

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jane

Family name: Mitchell

Organisation: Adelaide council residents

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: We are a privileged city to be surrounded by parklands. This area is well delegated and under no reason should be developed on for commercial use. The hospital development can be achieved with in the proposed alignment. Underground car parking so not on park lands. I can accept Pop up cafes but not permanent structures with in this present.

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sent to
proponent email: plansasubmissions@sa.gov.au

Jane Paterson

Dear Sir/Madam,

I am writing to you with concerns I have with the proposed stadium in Helen Mayo Park. It should not proceed for the following reasons;

1. My understanding is the stadium would replace the Entertainment Centre at Hindmarsh. If so, the question needs to be asked why can't this site be upgraded? Apparently the build in the Parklands will be double the cost to taxpayers and in the process destroy a big part. Why not the obvious cheaper and less destructive option?
2. Helen Mayo Park is part of the world-unique, National Heritage listed Adelaide Park Lands and should be retained as such, in it's entirety.
3. It's a beautiful Park with many trees and open space which should remain intact for us to enjoy and future generations.
4. By destroying our mature trees it goes against the State Governments own targets of of 20% increased in green urban canopy cover by 2045. Planting new trees will take years to grow and the warming climate is affecting their ability to mature. I've read 891 trees need to be planted to offset the loss of just one big tree!
5. It's contrary to the State Governments own 'Green Adelaide' which is working towards a vision of a cooler, greener, wilder and climate resilient community.
6. A stadium benefits a few members of a society, whereas, a Parklands benefits many. **Some of the benefits include** cooling and greening our city, shade, bird life and habitat, fresh air, carbon sequestering from traffic fumes and a local connection with nature.
7. It will require expensive and disruptive relocation of the rowing club which is a much loved institution.
8. Amenities will be reduced along the Torrens Linear Park such as running, walking and cycling and the Adelaide Kauria Walking Trail.
9. It's contrary to the statutory principles of the Adelaide Parklands Act 2005 which is to protect and enhance the Adelaide Park Lands.

10. It is named after one of South Australia's most famous women - a pioneer in medicine and health education - surely that should mean something. I wonder what Helen Mayo would have thought of the plan to desecrate a Park named in her honour?

Furthermore there seems to be a disconnect between the Governments 30 year plan for Greater Adelaide, the current planning code and this above-mentioned plan for the Park lands eg A Green Liveable City 20% increase in urban green cover in metropolitan Adelaide by 2045. In the State of South Australia, the tree laws are such that the trees always lose out. I'm deeply concerned at this rate of tree destruction and open space. Mature trees are better at adapting to the effects of Climate Change and should be given protection. I do not understand how the State Government can continue with the "business as usual approach" and continue with such an ill conceived plan, especially as Adelaide is getting hotter and drier. Once it's gone, it's gone forever.

Thank you for considering my objections.

Your sincerely,

Jane Preston

Jane Rossetto

I'm writing to express my disapproval of the carving up of the parklands esp the area of Pinky Flat Recently used for a large community event Adelaide doesn't have enough going for it , other than the tranquility of being a large small town with parklands and walks Hands off go redevelop the outer suburbs for profit and keep away from our natural lands

Ill be changing my vote because of this Jane

I phone says

Janet Boon

"I strongly reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Swelling political party coffers by rezoning to allow development is lazy, irresponsible and unimaginative. Do the job properly. The State is in the midst of a health and housing crisis. In addition, construction contracts and external consultants are sourced either interstate or overseas - you don't even keep the work here in SA. It's abysmal and apathetic.

Janet Boon

Janet Scott

Hi all

This is my more detailed submission on the riverbank code submission.

in summary I think we should stop building all over our iconic internationally inspiring parklands and start investing more in the landscaping and fresh air and gardens for the social, and physical and mental wellbeing of the people of Adelaide.

thank you

Janet Scott
[REDACTED]

Janet Scott on Riverbank Precinct Code Amendment 27/10/2021

Submission by Janet Scott, resident of Colonel Light Gardens
[REDACTED] DC 5071

To plansasubmissions@sa.gov.au

RE: Riverbank Precinct Code Amendment
Consultation: Riverbank Precinct Code Amendment
Period: 15 September to 27 October 2021

Summary

The Parklands are the international standard for best practice in town planning for the social wellbeing and health of the people who live in the town or city. And I mean preventative health care – to prevent people ending up in hospital – not by replacing the open spaces, and plants. Fresh air and exercise for everyone are important in preventing diseases of the body and the mind.

Buildings do not have the same benefit for the human existence that open spaces with grass, and trees and gardens and rivers and other natural features do. Neglect of open spaces is not an excuse to sell it off and build all over it. It requires actual landscaping of the open space in a similar way that the Botanic Gardens has gardens and the Waite Arboretum has open spaces and trees with paths for walking. To make it a pleasant place to be as originally intended. For all the people of Adelaide – not just the ones who pay for tickets and accommodation.

Addressing your “intentions”

- *Rezone land west of the Royal Adelaide Hospital from the Adelaide Park Lands Zone to City Riverbank Zone (Health Subzone) to support the development of the new Women’s and Children’s Hospital.*

Maybe the new WCH could be put over the railway lines? Same with any car parking tower. Another good place – is near Flinders Medical Centre on the Tonsley site or what's left of it. Ideally not too close to South Road and the noise and pollution that generates. And Mitchell Park could be the rest and recuperation area. It really should go on land already developed that needs repurposing like the Hills factory site or the LeCornu site and not Adelaide Parklands.

- *Rezone land west of Montefiore Rd from Adelaide Park Lands Zone to City Riverbank Zone (Entertainment Subzone) and a portion of land already in City Riverbank Zone from Health Subzone to Entertainment Subzone. This will support the development of entertainment-related uses, such as an arena.*

Arenas and sports stadiums benefit a small percentage of people of Adelaide and South Australia – and this is a bad place for an Arena anyway. I thought that this area was going to be landscaped for the benefit of patients and staff at the RAH and other buildings. The more intensely built up an area is – the more precious open space is as a place to replenish a human body and mind. This particular area is much abused. If the purpose of putting an arena here is to provide access by public transport – why is half of it given over to car parks. Clearly a lot more investment in safe and frequent public transport, especially when shift workers need it, is a better idea.

- *Rezone land from the Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone) to more appropriately reflect the land use and form of the existing Adelaide Botanic High School and its curtilage.*

No. This area was supposed to be returned to the Botanic Gardens. Not made into a school. Again – land already developed and in need of repurposing should be used. Maybe the Volleyball courts on Frome Road. Or instead of building a sky scraper of apartments in the CBD – we could build a school? I am sure there are some buildings in Adelaide itself that would benefit from redevelopment. Even the old LeCornu site as a school would be better than what they planned.

- *Apply a new Riverbank Subzone in the Adelaide Park Lands Zone to the southern and northern side of the River Torrens between Kintore Avenue and the Torrens Weir to accommodate smallscale development such as cafes and shops (both on-water and off-water) that contributes to the activation of the riverfront, in a way that protects the open landscaped character and heritage values of Elder Park.*

No – it is important to have a green belt along the Torrens from the hills to the coast – This provides an important Linear Park for people and critters to move between spaces by foot or bicycle. Areas that have this are substantially more valuable than areas that are barren and built up.

- *Update the 'Concept Plan 85 – City Riverbank' within the Innovation Subzone to retain the important open space link from Frome Road to the Adelaide Botanic Gardens.*

A lot of this space was also supposed to be returned to the Botanic Gardens in a version of land swap because of the building up of the Western end of North Terrace. New buildings here are inappropriate. The open space link needs to be not a link but the whole.

- *Make policy changes to support connections and linkages throughout the precinct.*

To me it seems like all the amendments support building all over the parklands along the river and will completely destroy connections and links that already exist.

- *Policy changes to support development of high quality and amenity.*

Policy should support landscaping of plants, trees, grass, and gardens as a park lands not a car park and build up area indistinguishable from Adelaide inside the four terraces. Large scale buildings are completely inappropriate. Subdivision is inappropriate, and selling off any part of the Parklands is a crime against the Adelaide Parklands Act and the intentions of the founding fathers of South Australia.

[Background]

The Riverbank Precinct Code Amendment is consistent with the South Australian Government's vision for the Riverbank, delivering a world-class health, sporting, educational and biomedical precinct with strong connections to the city centre and reinforcing North Terrace as a premier cultural boulevard.

The parklands as park – natural plants, and grassland and trees landscaped to provide a relaxing and healthy experience for the people of Adelaide is what the SA founders and Colonel William Light intended. Large scale commercial and residential buildings were supposed to be outside the Parklands. Even most government buildings were supposed to be around Victoria Square. The Parklands are also to provide a buffer from the Urban and City buildings and roads.

We should not be destroying a world class city green belt with buildings.

The parklands are Nationally Heritage listed for their role in modern Town Planning for the benefit of city people. It was the first time a city had been completely surrounded by a green belt intended for the fresh air and exercise of the people who live there.

They are part of the inspiration for the first Town Planning movements and the Garden City movement in particular and the effect much copied around the world. And now you want to destroy the original city green belt. It is on par with building over Hyde Park in London because hospitals and schools and private apartments are somehow more important. I cannot agree with that. This Liberal Government legacy will be the destruction of what makes Adelaide special and important internationally and has done since the city was first laid out.

The parklands must be State Heritage Listed to go with the National Heritage Listing and the principles set out in the Adelaide Parklands Act must be followed.

This code amendment does not do this and I am shocked that the South Australian State Government would propose such destruction of our iconic parklands.

Thank you for reading and I hope you reconsider towards preserving what is best about Adelaide. Green open space of grassland and trees and landscaped gardens for the benefit of the people – including our tourists and visitors.

Yours Sincerely
Janet Scott

[Redacted signature block]

Janet Southern

Hello honourable members,

I would like to add my concern about the proposed redevelopment of the Adelaide parklands. Adelaide is a beautiful and unique place, we do not need to compete with Melbourne or Sydney (places i may visit but would never want to live in). We have no need to be like them, we need to keep our uniqueness and be our own identity, not be another copy of the eastern states! We need to keep our green spaces - so important for our physical and mental health. So so beautiful. I urge you, Please do not go ahead with these developments, I add my voice to others of like mind. The below statement says it much better than I:

"I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

With respect and kind regards

Janet Southern

Janice Gamble

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Janice

Family name: Gamble

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do not support the changes to the parklands. The parklands have been left in trust for the people of South Australia. What will there be left to look at from the cafes and restaurants if the park is built up. I especially do not approve of the change to allow 20 storey buildings. The parklands should be maintained in a better state not built on. The focus of the state government should be on revitalising the city shopping and business precincts. The city is dirty and run down, paving has been lifted and replaced with asphalt leaving a patchwork quilt effect with painted markers for I presume services. The whole effect is run down and the impression is that we do not care what our city looks like and what state it is in. How about we revitalise some of our buildings despite the cost I am sure you would gain support for this. Having listened to the radio and read the newspaper I believe that the majority of South Australians do not want a new stadium or buildings on what is left of our parklands. How about you listen to the people of South Australia instead of going off on a tangent completely at odds with our wishes.

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sent to
proponent email: plansasubmissions@sa.gov.au

Jasmin Neophytou

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jasmin

Family name: Neophytou

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: It is absolutely hypocritical to use the parklands as a point of difference from other states, to use it in tourism campaigns and to apply to be a national park city when the state government is constantly trying to rezone the parklands for development and infrastructure. The parklands are a gift to the city of a Adelaide. They are the backyards of city residents, a retreat for wildlife, they offer tranquility and a slice of serenity for cbd workers. With the government's plan to reduce minimum lot sizes for housing, the parklands are going to become the only bit of nature that people will have access to. If the state government wants to create more space for hospitals, entertainment precincts etc start buying up land that has existing developments within existing built environments. If the state government is trying to control urban sprawl maybe they should start looking at how they are contributing to the destruction of our natural environment within the city. These parklands are critical to the health of the city as a green space, not as "activated" spaces or hospitals.

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sent to proponent email: plansasubmissions@sa.gov.au

Jason Goncalves Da Costa

I'm emailing to inform you as a member of the Adelaide public I do not support your vision to rezone the Adelaide parklands. Something that makes Adelaide so beautiful is how well incorporated so many natural habitats and parks are weaved into this city. A remarkable balance of nature and city and I think rezoning the parklands would be a major irreversible mistake.

Thank you,
Jace Gonçalves Da Costa

[REDACTED]

[REDACTED]

Jean John

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Jean

Family name: John

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I oppose the Riverbank Precinct Amendment Code for the following reasons:- 1 The Parklands were set up by the founding fathers for the people & are of historic value. 2 The Parklands are unique to Adelaide & world renowned. 3 The open spaces & trees that surround the city mitigate the effects of climate change. 4 We should be working to undo the damage done by previously allowing building on them. 5 We don't need a new entertainment centre & if we do, not there. 6 it is an inappropriate place to build a hospital. It is pure greed by the council & developers.

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sent to
proponent email: plansasubmissions@sa.gov.au

Jeanne Hurrell

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jeanne

Family name: Hurrell

Organisation: private citizen

Email address: [REDACTED]

Phone number [REDACTED]

Comments: I am very much opposed to further development on any area of the current Adelaide Parklands with the exception of the space above the railway lines along North Terrace. Too much of the area has already been developed with significant loss of amenity and natural habitat.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Jenni Boyle

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jenni

Family name: Boyle

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please preserve the history, do not distort a valuable asset. It is vital to the city of Adelaide.... A draw card. I can go to many cities to see developments.... But none have the Adelaide Goal , a vital part of Australia's history that must be maintained and protected

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sent to
proponent plansasubmissions@sa.gov.au
email:

Jennie Wilkinson (Committee for Adelaide)

To the Code Amendment team

Please find enclosed the Committee for Adelaide's submission regarding the Riverbank Precinct Code Amendment.

Thank you,

Jennie Wilkinson

Policy Manager

Monday to Thursday

M [+61 \(0\) 414 758 481](tel:+618414758481) | P [+61 \(0\) 8 8410 5301](tel:+61884105301)

jennie@committeeforadelaide.org.au

89 King William Street, Ground Floor (Box 14), Adelaide SA 5000

committeeforadelaide.org.au

27 October 2021

Caroline Mealor
Chief Executive
Attorney General's Department

By Email: plansasubmission@sa.gov.au

Dear Caroline,

The Committee for Adelaide welcomes the opportunity to put forward a submission in response to the Government's proposed Riverbank Precinct Planning and Design Code Amendment.

We are a community of businesses, charities and cultural organisations that are passionate about the future of our state and intent on shaping a brighter future for greater Adelaide, the most liveable city in Australia and the third most liveable city in the world.

Our vision for Greater Adelaide is, by 2032, to be the most liveable, extraordinary, and vibrant global city that people and organisations from all over the world want to be a part of while those who live here are proud to call home.

We recognise that the Riverbank Precinct is a vital part of our city's cultural identity and contributes to the vibrancy that millions of locals and visitors are attracted to each year. Having a vibrant city centre is important for South Australia as it attracts business investment which contributes to our state's economic growth, jobs creation and future prosperity.

We **strongly** support the government's proposed code amendment to further activate the Riverbank Precinct to improve amenity, enhance the public realm and create more vibrancy within the Precinct. In relation to the proposed policy changes we provide the following comments:

- Entertainment Subzone

We **strongly** support the proposal to extend the entertainment use west of Morphett St bridge to provide a more active river frontage whilst ensuring our park lands are protected and enhanced to add further vibrancy and attractiveness to our city. Improving the east-west connection between development on either side of the bridge should enhance accessibility and add value for visitors to the area.

- Creation of a Riverbank Subzone

We **strongly** support the creation of a Riverbank Subzone that enables the extension of the precinct's activation, including on-water and off-water development sensitive to the Park Lands.

Currently, we have some fantastic events that draw visitors to the Riverbank Precinct, including sporting events at Adelaide Oval, OzAsia Festival, Fringe Festival, Carols by Candlelight, however, they do not provide constant year-round activation. A lack of vibrant spaces with poor visibility particularly in the evening can impact safety along the River Torrens and effect utilisation of the precinct by all.

The Committee would like to see year-round activations of the Riverbank Precinct that draw people to the city on a regular basis. Enabling a diverse range of community, cultural, tourism, retail or licensed premises adjacent to the river will significantly enhance visitor offerings and contribute to the year-round activation of the Riverbank Precinct.

Overall, where pedestrian and cycling access and connectivity are noted within the amendment, we would like to see this expanded to other types of mobility to support current and future use. Improving

connections, particularly for pedestrians, cyclists, and other forms of mobility, within the Riverbank Precinct and North Terrace are critical for accessibility and attraction.

We view the proposed changes to the Riverbank Precinct as a step towards enabling Adelaide to become a more vibrant global city.

Should you wish to discuss any issues raised in this submission please contact me directly on [REDACTED]
[REDACTED]

Bruce Djite
Chief Executive
Committee for Adelaide

Jennifer Bandick

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jennifer

Family name: Bandick

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: As custodians of the parklands we should not keep taking away space from this area, it is for all people now and in the future. Surely there is plenty of other places these facilities can be placed. It is for our wellbeing and the flora and fauna of area to thrive, just leave it alone. This is inappropriate for infill and goes against the whole idea of parklands. Large buildings on green space will be forever lost, it's just simply wrong.

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sent to
proponent email: plansasubmissions@sa.gov.au

Jennifer Stokes

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jennifer

Family name: Stokes

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: Please keep the riverbank as is, or with further planting of natives. There is no need to add further commercial development on our parklands or other green space around the city. We are working to be recognised globally for our green space, so let's focus on this asset, rather than chipping away at it. With projected increases in temperature, we need to create more green urban oases throughout the city (and avoid concrete).

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proponent email: plansasubmissions@sa.gov.au

Jenny Allport

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Jenny Gallas

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please protect the nature we have left and build in other parts of the city.

Yours sincerely

Jenny Gallas

Jenny Pearce

Please no more development along the River Torrens and our beautiful parklands, having the natural space is so much more beneficial to Adelaide. Do not under any circumstances remove our magnificent old and young trees which are so beneficial to our health and well-being.

We live with a 400 year old redgum in our rear yard and admire it's beauty everyday. Keep all the trees and parklands free of any further development.

We do not need another stadium.

Over development is not acceptable.

Please consider all alternatives, Adelaide's open space must stay as is.

Concerned

Jenny Pearce

Jenny Weaver

The parklands are a unique feature of Adelaide.

They are precious asset which blesses the city with not just its character but a breathing space; a green area for recreation and the potential to save some of our precious flora and fauna.

I strongly disagree with the proposed code change. Every generation of planners and, it would seem, all developers, want their hands on this beautiful feature of our city but we must resist the temptation to use it to find an easy new space to develop. We must preserve it. Nibbling away at it via the proposed code change sets a very bad precedent. If each generation thinks it can take just a bit more the parklands could well be all gone In a hundred years' time.

Where else can we save our glorious gum trees? All over the suburbs they have been chopped down for one reason or another. No council ever says "no" to an application to eliminate them, and I challenge you to check the statistics on this. Opportunities for development exist elsewhere. Recently as I cycled to the Port on the new Parkway Track through the old industrial suburbs, there were numerous sites left abandoned as manufacturing has left the state. These would be ideal places for new projects.

Please leave the parklands as they are for us all to enjoy. Please preserve "the lungs" of the City of Adelaide. If we are to remain one of the most liveable cities on the planet we must respect this space. Indeed, we should be celebrating the parklands more by making sure they represent and increasingly provide access to the diverse flora and fauna of South Australia.

Jenny Weaver

██████████

██████████ 5031

Jesse Coleman

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: jessw

Family name: coleman

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. to say nothing of the massive environmental impact of losing crucial vegetation that is vital to mitigate the effects of heat traps/heat islands and other adverse effects in urban areas It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Jessica Lawson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jessica

Family name: Lawson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do not support the proposal to rezone/subzone the parklands. I am shocked that the public would be losing ~10% of the city's parklands to this plan. As a GP, I am made aware on a daily basis of the mental health toll that the pandemic is taking on Australians. Our parklands have been one of the main things that sustains Adelaidians during lockdowns and in times of stress. Research strongly supports the importance of nature and exercise in our physical and mental well-being. Losing our greenspaces is detrimental to our health and happiness. Our parklands are what makes Adelaide special, unique, and worth preserving. I vote in support of any candidate whose priority is preserving our green spaces.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Jill Amery

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jill Amery

Family name: Same

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Our Adelaide Parklands are unique in the world and a heritage treasure for those of us living here. Inappropriate building development should not be contemplated in our Parklands without proper consultation with and consideration of the public's viewpoints, and those of their official and expert representatives. Our Parklands must be protected against the type of development being proposed now by government. Development should never be undertaken at the expense of the environment!

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sent to proponent email: plansasubmissions@sa.gov.au

Jill Bowden

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jill

Family name: Bowden

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments:

I submit my objection to the proposed change in land use and request you seriously consider one of the arguments against this change as submitted here. Sincerely, Jill Bowden, Gomersal.

Attachment:

I_submit_my_objections_to_the_change_of_land_use_from_ope
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sent to proponent email: plansasubmissions@sa.gov.au

I submit my objections to the change of land use from open park to the extension of the built upon environment of the CBD upon The Riverbank Parklands known as Karrawirra Pari.

The history of this land is as old as the history of the Kurna nation who lived and hunted on this land until white settlement of the Adelaide area.

In "The Biggest Estate on Earth" by Bill Gammage (2011), the setting of Adelaide is described by explorers and early settlers, as "like a gentleman's park, with extensive grassy patches and pathways..." Aboriginal people cared for the land using land-management techniques passed down through their generations, and had, and continue to have, an attachment to Country which we, as non-indigenous residents, cannot honestly say we fully understand. Theirs is an ancient culture of which we are only recently appreciating the depth, as we truly LISTEN to our Aboriginal brothers and sisters.

I am a comparatively new migrant to South Australia, arriving as a child in 1957, but even as I travel around our state, I have recurrent visions of "the time before", as a superimposed template, of Aboriginal people hunting kangaroos etc and of their intimate connection to the land.

Since European settlement, when Col. Light chose Adelaide to be our state capital, with buildings sited above the Torrens River flood-plain, Aboriginal people, including Kurna people of The Adelaide Plains, were moved off their personal country, to missions distant from their place of birth, with the intent of dislocating them from their historical attachments. An example is Stephen Gadlabarti Goldsmith who believed he was Narungga, but then discovered his family had been moved from Kurna Country to the Point Pearce Mission and Aboriginal Station on Yorke Peninsula. I personally know other indigenous people moved from The River Murray to Point Pearce.

In addition, in 1846, Governor George Grey forbade the use of the Kurna language; it was only saved from extinction by two Lutheran missionaries, Schumann and Teichelmann, who ran a Kurna language school and who recorded about 2000 words and 200 sentences, before their work was stopped by Governor Grey.

In February 2018, June Oscar AO, Aboriginal and Torres Straits Islander Social Justice Commissioner said: "There is more work to be done to support the healing of The Stolen Generation survivors and their communities. We don't make amends by saying Sorry; we must ACT on words. It requires THE WILL of the political leaders to truly LISTEN to what indigenous Australia is saying."

From the Special Board Meeting of 30 September 2021, of the Board of the Adelaide Parklands Authority (APLA), Appendix A: "It is well understood the River Torrens/ Karrawirra Pari is of great significance to Kurna, particularly Pinky Flat and the adjacent Adelaide Oval area which, together formed an important campsite and corroboree ground.'

This Board has not approved the rezoning of one tenth more of the parklands adjacent to The River Torrens, i.e. 70 hectares, to accommodate buildings.

Further, from APLA Thursday 30 Sept 2021 Special Board Meeting, immediately after The Welcome, there is: "APLA acknowledges that we are meeting on traditional country of the Kurna people of the Adelaide Plains and pay respect to elders past and present. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kurna people living today". These words have been assiduously mouthed in acknowledgements generally spoken at the beginning of public meetings in Australia.

Reiterating the above, we must ACT on words spoken. Otherwise the declarations of acknowledgement are at least hypocritical, even farcical. They bring shame on us non-indigenous South Australians when we behave in an opposite fashion, robbing Kurna people of their beloved country!

I have noticed that we are subject to tokenism, when we “crown” individual indigenous people with accolades, but at the same time are unwilling to consult and listen in a truly conciliatory way. We readily impose our Western thinking on people who have a rich culture of community and spiritual thinking often foreign to us, but of no less importance.

The fact that indigenous elders and communities were not consulted prior to this take-over plan should APPAL us by its obvious intent of withholding critical information from them; the government cannot claim ignorance.

The fact that we no longer have widespread public notification of this and similar plans is another fault of our present system. I personally read of this massive proposal 3 days ago, “by chance”.

It is TIME that our government stopped acting like FEUDAL LORDS. “Government owned” land legally belongs to the people of South Australia and if a government wants to build new government buildings, they should be built on land purchased by the government for that purpose, on land that has an appropriate land-use category, and not by co-opting our sacrosanct, to ALL South Australians, Parklands. In addition, to centralise all public buildings is divisive of even our non-indigenous communities, disadvantaging those who live outside the CBD. There is a plentiful supply of land, for example west of the city, accessible to the N-S major roads network and in areas where employees can commute without further congesting the CBD.

Finally, a change as major and impacting as this proposal should only be considered in the context of policies leading up to an election; with approval by both houses of parliament; or by a referendum. These River Torrens Parklands belong to us all and this issue, in all likelihood, has the potential to affect the polls at the 2022 elections.

Jill Cooke

I want to register that I oppose building on the Park Lands, absolutely and completely.

No additional built form should be constructed on the Adelaide Park Lands.

Thanks for your attention,

Jill Cooke

5064

Jillian Dellit

I think it is a mistake to bundle so many changes into one consultation and proposed zoning change. There may be merit in some change in some areas but this is overwhelming. In my view, preserving the natural environment and significant Kaurna sites should be top priority. I can see some changes to facilitate educational activity may be beneficial. I do not see the need to prioritise either entertainment or sporting activity. Nothing should happen without consulting the Kaurna elders and assessing the impact on wildlife and open space. Each proposal should be dealt with separately and be fully consulted and assessed.

Sincerely

Jillian

Jillian Dellit

[REDACTED]

Adelaide

South Australia. 5000

[REDACTED]

[REDACTED]

Jo Gebhardt

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: jo

Family name: gebhardt

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: Adelaide is one of the few designed cities in the world and we have managed not to wreck it, Thanks to the brilliance of William Light and the gutsy colonists, as the world wrestles with climate change, we are surrounded with beautiful natural parklands. Once these are changed, there will be no comeback. Shortsighted, brainless and try hard to put commerce money first. Show respect for the design of Adelaide and stop trying to copy everyone else

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sent to
proponent email: plansasubmissions@sa.gov.au

Jo Seretis

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: jo

Family name: Seretis

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I believe it is morally reprehensible for the government to even consider utilising accommodation &/or large scale commercial enterprises on the parklands. They are a godsend to our city & should remain relatively free of buildings.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Joanna Wells

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Joanna

Family name: Wells

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I'm writing to oppose this code amendment. The people of South Australia generally, and those of us who live in Adelaide in particular, value our Park Lands. The vast majority of us are singularly unimpressed by the efforts of government to get their hands on increasingly large parts of our public space and other public assets. With housing blocks becoming smaller and smaller, open space such as this is increasingly important. If you want to take a site that needs rehabilitation and turn it into a sporting arena, there are plenty of other sites where you can do that. Our Park Lands are unique and there should be no further encroachment on them. They make a significant contribution to the character of Adelaide and are a key attraction for those who visit our (formerly, I'm tempted to say) beautiful city. The people of Adelaide are tired of hearing visitors comment on how much Adelaide has changed for the worse. This should not be allowed to go ahead. Enough damage to the fabric of Adelaide has already been done through government which appears very much to listen more to those sectors of society able to make significant donations to political parties than to the majority of people who live here and who also have a right to have their needs and wants met. This is part of your duty of care to the people. If you allow this to go ahead, you will have failed to meet that cornerstone duty of government. We need our Park Lands more than ever. Joanna Wells

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sent to proponent email: plansasubmissions@sa.gov.au

Joanne Brougham

From: Joanne Brougham [REDACTED] >
Sent: Tuesday, 26 October 2021 2:18 PM
To: AGD:Plan SA <PlanSA@sa.gov.au>
Subject: Riverbank parkland grab

Good afternoon,

I am totally opposed to the proposed changes to the riverbank parkland by PlanSA.

The consultation period is too short. This land grab totally affects all South Australians and the consultation period is a joke. Apparently PlanSA have only just realised that they should be consulting with the Kurna Elders. So not only is the public consultation period too short you failed to consult with a very significant stake holder.

Reading the Advertiser today I am horrified as to what PlanSA propose.

I can not agree on any of the development you propose should occur. Once that land has gone there is no getting it back.

Why not use the land at the old West End Brewery Site for the W&CH or the land in Bowden, room on both sites for a hospital and car parks both serviced by tram also and within easy reach of the Adelaide Hospital. For goodness sake think outside the square.

We do not need any more multi level apartments, let's fill all the ones built in the past couple of years first.

I wish for my opposition to the proposed changes to the parklands to be recorded.

Regards

[REDACTED]

Joanne Thredgold

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Joanne

Family name: Thredgold

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am very concerned about the Riverbank Precinct Code Amendment. This is a public space, owned by the community, which has already been overdeveloped. It should be left as the Parklands that it is, and not sold off to commercial interests with little benefit to the general public. The current use of the site honours the traditional Aboriginal use of this very important location, the proposed use would not. It is clear that this is just another attempted erosion of the Adelaide Parklands, and should not be countenanced. There is already within the CBD areas of underdeveloped retail and business buildings that should be adapted or reused instead of the riverbanks. Please investigate those areas instead.

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proponent email: plansasubmissions@sa.gov.au

John Bridgland

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: John

Family name: Bridgland

Organisation: John Bridgland

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please find attached pdf 14 pages. 'JB submission Riverbank Oct2021.pdf'

Attachment: JB_submission_Riverbank_Oct2021.pdf, type application/pdf, 232.2 KB

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sent to proponent email: plansasubmissions@sa.gov.au

Consultation: Riverbank Precinct Code Amendment

Period: 15 September to 27 October 2021

Feedback to:

[https://plan.sa.gov.au/have_your_say/general_consultations/public_feedback_on_initiated_code_amendment?aid=Riverbank Precinct Code Amendment](https://plan.sa.gov.au/have_your_say/general_consultations/public_feedback_on_initiated_code_amendment?aid=Riverbank_Precinct_Code_Amendment)

Submission: Riverbank Precinct Code Amendment

14 October 2021

John Bridgland

'Omission of reference to lack of policy support by the City of Adelaide for most of the projects proposed for the Riverbank Precinct rezoning bid (via the council's legislated park lands instruments under the Adelaide Park Lands Act 2005) is a major flaw. It has the potential to significantly mislead many respondents.' Extract, page 14.

Summary

Response: the procedure

- The consultation relating to matters contained in the document Draft for consultation, *Riverbank Precinct Code Amendment*, Chief Executive, Attorney General's Department (approved 10/9/21) does not comply with the Community Engagement Charter as prescribed under legislation¹ because the engagement is not genuine, inclusive or respectful, and not well informed or sufficiently transparent.
- The consultation assumes high-level professional planning knowledge, which is unreasonable and has potential to alienate the 'broader South Australian community' and thus discourage some respondents from participating. For example, despite the substantial documentation provided, few respondents will comprehend that PlanSA's fundamental proposal seeks to replace existing desired planning outcomes for the Adelaide park lands zone in the current Planning and Design Code with alternative desired planning outcomes for the zone land on which major built form development is proposed.
- Although this consultation purports to encourage feedback that has potential to *influence* the outcome, in reality the scope is tightly restricted by PlanSA. Moreover, this restricted scope is not prominently highlighted.
- The 'consultation' is, in effect, an 'information-only' notification to the SA public that purports to be a 'consultation'. This is a disingenuous, non-respectful process.
- It is clear that this code revision proposal is at a final draft stage, ready to quickly implement, and the suggestion that it is merely 'a work in progress' with no schedule indicates that the consultation is not genuine. The public consultation ('engagement') is not occurring early enough to allow for feedback that might genuinely influence the proposed planning policy.
- Insufficient information is presented about the content of the strategic reviews preceding this proposal, such as the Renewal SA and State Planning Commission investigations, reviewed subsequently by the Capital City

¹ The *Planning, Development and Infrastructure Act 2016*.

Committee and then endorsed by state cabinet. This has restricted the ability of ‘the broader South Australian community’ to fully understand the background leading to the rationales driving this proposal, and thus to articulate a response.

- The absence of a Master Plan for the whole of the Riverbank Precinct to reflect the recommendations of these reviews illustrates the extent to which this consultation is not well informed or transparent.

Response: personal

- I object to this proposed code amendment and I object to the rezoning proposal.
- The amenity of the Riverbank Precinct will be further damaged if it is approved. (Its existing institutional zones and their built forms already present a confronting, out-of-scale, poorly managed interface with the Adelaide park lands zone’s sites.)
- Existing park lands zone sites should not be rezoned into sub-zones for the purposes of the proposed developments. Sites should remain protected, as open landscapes, accessible to the public by mutual agreement between the state and the City of Adelaide, consistent with the *Adelaide Park Lands Act 2005* statutory principles.²
- I support the Adelaide Park Lands Authority’s resistance to this proposal (as at 30 September 2021 – during the period of consultation).³ Its administrators observed that:
- *“The Riverbank Precinct Code Amendment clearly envisages more built form and further loss of open space. The removal of land from the Adelaide Park Lands Zone in the Riverbank Precinct Code Amendment sets up a planning framework that could lead to development, which is inconsistent with Park Lands values. This could include an increase in buildings, particularly the scale of such buildings, less emphasis on open space and less emphasis on public use, which, in turn, will lead to the alienation of public land. It is difficult to understand the State Government’s vision for the Riverbank Precinct without a current Master Plan available for viewing.”*⁴

² In particular: *“State Government, State agencies and authorities, and the Adelaide City Council, should actively seek to cooperate and collaborate with each other in order to protect and enhance the Adelaide Park Lands.”*

³ Adelaide Park Lands Authority, Special Board meeting, Agenda, Item 3.1, ‘Key messages for submission on Riverbank Precinct Code Amendment’, 30 September 2021 (page 8).

⁴ Ibid, page 9.

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1. Consultation not genuine, inclusive or respectful, not fit for purpose and not well informed or transparent	7
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- Not genuine
- Not fit for purpose
- Not well informed
- *Four examples*

2. Riverbank Strategic Review background material not provided	11
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3. Minimal opportunity to influence the outcome	12
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- Effectively an ‘information only’ procedure
- State correspondence confirms urgency to commence
- The fiction that ‘engagement is occurring early’
- The fallacious assumption that non-expert respondents have a detailed understanding of SA state planning policy and practice
- The misrepresentation of facts relating to legislated park lands policy instruments under the *Adelaide Park Lands Act 2005*

The document sources examined

A key source informing this response was the following document:

Government of SA, Draft for consultation, *Riverbank Precinct Code Amendment*, Chief Executive, Attorney General's Department, approved 10/9/21 (88 pages).

Additionally, other link documents provided on the consultation website during the consultation period were examined, as was the YourSay website. The 'Frequently Asked Questions' document was of particular concern given that, in an attempt by its authors to simplify explanations, it has omitted some detail that would more accurately inform respondents about certain sites and so-called benefits of rezoning.⁵

The 'proposal'

The superficial approach of the YourSay site was of concern. At that site an invitation to quickly respond via digital means appeared, including a "Quick Poll" appearing at the top. Respondents were offered three buttons: "Yes, I support the proposal"; or "Yes, but I have some concerns"; or "No, it should not proceed." But what was 'the proposal'? There wasn't one listed. Instead, only one question appeared:

"Do the proposed amendments reflect the vision to create a premier health, entertainment and cultural boulevard?"

For those departments, agencies and commercial interests seeking the benefits of future development access to the Adelaide park lands zones in the Riverbank Precinct the obvious answer would be yes. The 'vision' is not accompanied by a Master Plan for the whole of the Riverbank Precinct. It is presented as a 'glorious, big picture' concept predicated on the uncontested assumption that, to achieve it, sites in the Adelaide park lands zones must contribute to the economic development of the state via a major rezoning exercise, a revision of recently implemented planning and design code, which includes creation of a special new sub-zone, with newly written code. By any 'broader community' analysis, the proposal is antithetical to the statutory principles of the *Adelaide Park Lands Act 2005*. Many respondents will note this in their responses, appealing to the obvious political and planning contradiction of these principles inherent in the proposal. State planners, however, have adopted an Orwellian rationale, adopting nonsensical semantics:

"There is a recognised strong relationship between the [Riverbank] Zone and the Adelaide Park Lands Zone. [Proposed] policy contained in the zone leverages this

⁵ For example, reference at the FAQ page 3 refers to the proposed site for the Riverbank Arena (Helen Mayo Park) and implies that it is a denuded area in need of 'rejuvenation' in the form of new built-form development. However, until about 2015 it was an Adelaide park lands events area as a result of remediation in 2013 under a 2012 \$1.7m master plan funded by the city council. Remediated landscape and open space was the principal objective. It is only 'neglected' because the council failed to complete the master plan, did not plant many trees as required under the plan, and subsequently used much of the land as a dumping ground for dredged, contaminated river silt.

relationship, while ensuring that the built form, relationship and public realm outcomes value what the park lands bring to the zone.’⁶

State economic development rationales in the proposal include:

- That the Riverbank Precinct needs to be ‘revitalised’ so that activation, accessibility and social amenity of land in the park lands zones can be ‘maximised’.⁷
- That certain park lands zone sites were ‘underutilised’⁸ and that to redress this deficit ‘adaptive reuse’ should occur, ‘to introduce a number of new activities to increase the attractiveness of the area to a broader range of people’.
- That at certain park lands zones some proposals, in particular, a new W&C Hospital, require new ‘accessible connections’ (a connecting bridge to a multi-level car park) to provide ‘connections to nature for children, women and their families through their hospital journey’.⁹
- That the banks of the River Torrens and Torrens Lake (‘the riverbank’) are required to be ‘activated’¹⁰ – an arrangement operational only on a temporary basis, but after rezoning will feature construction of permanent infrastructure, in the form of ‘low-scale’ (undefined) recreational activities... that ‘maximise community benefit’, as well as ‘small-scale’ (undefined) entertainment land uses that are unobtrusive and complement the open character and views of the River Torrens...’¹¹
- That a site described as riverbank (park lands zone) between Kintore Avenue and the Torrens weir needs to be ‘optimised’ ‘to include permanent low-rise (undefined) entertainment, food and beverage built-form development in front of the convention centre ‘to further activate the river frontage’.¹²
- That a site described as riverbank needs ‘additional infrastructure (undefined) to support large events’, and that the rezoning and revision of the code would seek to: ‘Encourage a small-scale, low-rise (undefined) development with land uses such as community, cultural, tourism, shops and licensed premises’ – an arrangement that currently operates on a temporary basis, but after rezoning will become permanent via the construction of new infrastructure.

A more appropriate question?

A more appropriate alternative YourSay question to focus on the central aspect of proposed change could have been:

“Should the existing Planning and Design Code, whose existing Adelaide park land zone’s desired outcomes envisage publicly accessible open spaces, and recreational activities supporting a variety of temporary land use forms, be replaced with new

⁶ Government of SA, Draft for consultation, *Riverbank Precinct Code Amendment*, Chief Executive, Attorney General’s Department, approved Caroline Meador, CE, 10/9/21, page 37.

⁷ Ibid. section 4.1.4, ‘Riverbank Strategic Reviews’, page 13.

⁸ Ibid. page 16.

⁹ Ibid. page 15.

¹⁰ Ibid. page 22 (‘Key objectives for Precinct 2’).

¹¹ Ibid. page 25 (Key objectives for Precinct 4).

¹² Ibid. page 25 (Precinct 4, Active Waterfront Precinct’).

code featuring desired outcomes that envisage permanent built forms in that park lands zone?”

History will record that this question was never asked. The YourSay website consultation model restricted the public to a response to one state planning ‘vision’ – without accompaniment by a Master Plan for the whole of the Riverbank Precinct. It featured a proposed permanent built-form development spree across multiple parks of the Adelaide park lands.¹³

It is obvious that the original question used, and the consultation approach, was manipulative and designed to influence the consultation outcome.

¹³ Parks (west to east) 27, 1, 26 and 11.

DISCUSSION

Discussion below responds to:

Government of SA, Draft for consultation, *Riverbank Precinct Code Amendment*, Chief Executive, Attorney General's Department, approved 10/9/21 (88 pages).

1. Not genuine, inclusive or respectful, not fit for purpose and not well informed or transparent

Not genuine

See comments contained in section 3, commencing on page 12.

Not fit for purpose

The state consultation claims that the 'need for the assessment' is to explain how the state will deliver a range of planning objectives. However, it fails to clearly demonstrate outcomes such as "improved accessibility and connectivity into and throughout the precinct". It also fails to adequately explain how proposed changes would result in "improved built form outcomes", given that at many of the identified sub-zones (with exception to the recently constructed Adelaide Botanic High School) there are no existing built forms at this time.

Not well informed

The presentation of dense reference documents comprising complex planning concepts and discussion is not necessarily evidence that a consultation is 'well informed'. Section 2.3.2 of the above document summarises a range of 'key changes' but the summaries are riddled with planning jargon, and explanatory material relating to various sites is scattered across the document such that a reader must refer to multiple sections to try to comprehend what is being proposed for some sub-zones. The lack of a Master Plan for the whole of the Riverbank Precinct is a key contributor to this. At times, a clear comprehension is impossible to achieve, because some matters are described in ambiguous terms, such as 'activation', 'small scale, low rise', 'land uses that are unobtrusive', 'high amenity', and 'complimentary land uses that are sensitive to the unique park lands.'

Four examples

The following examples illustrating 'not well informed' are not exhaustive. Many others could have been highlighted.

a) The proposed rezoning of the **land occupied by Adelaide Botanic High School, which also includes the land (park lands zone) immediately adjacent** (south; open space).

Future planning policy treatment of the land adjacent to the school becomes clear via reference to two maps provided later in the document¹⁴ that the state intends to

¹⁴ As shown on maps on page 47 (Ibid.): 'Riverbank Precinct, Current Subzones', and (below it), 'Riverbank Precinct, Proposed Subzones'.

simultaneously rezone that adjacent park lands site south of the school, suggesting that, as a result, the state may have other future land-use contemplations for that site. References buried elsewhere imply that the land will continue to be used as open space. (References in the Frequently Asked Questions document claim that ‘an updated concept plan’ for this site would ‘protect the link for pedestrian access’.) But proposed new inclusion of this site into the City Riverbank Zone would immediately introduce complying land use options such as serviced apartments or tourist accommodation. Moreover, reference to Appendix Attachment C – ‘Proposed Code Policy’ and the Assessment Provisions for the proposed **Innovation sub-zone** provide for a range of performance outcomes, including Performance Outcome 3.2¹⁵, which allows for built form up to 15 building levels, with fresh wording stating: “identified on Concept Plan 85 City Riverbank Adelaide”, which embraces the school land as well as land adjacent to the school. This is especially of concern, given that the document reveals in Appendix Table 5¹⁶ that, should the rezoning and code revision go ahead there will be no public notification about ‘*any kind of development* where the site of the development is not adjacent to a site or land used for residential purposes’ (the school is not used for this purpose) or unless it involves demolition of a state or local heritage place (which doesn’t apply at this site). Additionally, nowhere in the document, or elsewhere in other consultation documentation, is there an explanation to benefit the non-expert ‘broader South Australian community’ of the practical consequences of minimal or nil Deemed-to-satisfy or Designated-performance-feature criteria – illustrating what amounts to a rigour-free assessment model for those submitting future development applications under the newly revised code. There are many other instances of this poor level of explanatory information, with explanations by PlanSA scattered across the document relating to specific sites and land uses in a most reader-unfriendly matter.

b) Section 2.3.2¹⁷ introduces material and discusses (among other sub-zones) the **Entertainment sub-zone**. Inclusion into the City Riverbank Zone would allow for construction of a colossal Riverbank Arena, as well as a helicopter landing facility, serviced apartments and tourist accommodation (pages 49–50). The sub-zone wording states: “to ensure that the built form interface of the precinct with the park lands achieves a high amenity with a transition down in scale to the river, and design to provide an active an appealing edge to the river.” These words allow no hint of the proposed reality, revealed in the code appendix (‘Entertainment Subzone’: pages 59–61) that the sub-zone will also allow built-form development up to 20 building levels or 71m in height, but such scale is not to be located adjacent to the River Torrens. However, that sub-zone site (Helen Mayo Park; Park 27) *is adjacent* to the River Torrens. To realise the arena concept (which the state government has already announced is conceptually proposed at the edge of Torrens Lake) there has to be a substantial height and scale allowance in the code, and the creation of the sub-zone is key to this. Additionally, there is no requirement for competent interface management between institutional zones and the park lands zone proposed to be amended to a new sub-zone. For example, on page 59, at PO 2.1 (built form and character) the wording states: ‘Buildings of a height and scale that references North Terrace and *minimises*

¹⁵ Ibid. page 65.

¹⁶ Ibid. page 55 (Table 5, Procedural matters, Column A, *excluded from notification*, Class of Development: see proposed amendment wording in green.)

¹⁷ Ibid. – source: page 8.

impacts on the River Torrens.’ This is meaningless and open to wide, manipulative interpretation. Additionally, nowhere in the document (or elsewhere in other consultation documentation) is there an explanation of the practical consequences of minimal (or nil) Deemed-to-satisfy or Designated-performance-feature criteria – illustrating what amounts to a rigour-free assessment model for those submitting future development applications for this sub-zone under the newly revised code.

c) A discussion about **integrated transport** appears on pages 11 and 12.¹⁸ It suggests that the existing network is ‘adequate’, but if there is a requirement for modification of the road network, amendments will emerge “in future development applications”. It is very poor strategic planning practice to rely on future applications to determine transport policy (and outcomes) and such minimalist explanation highlights a very poor planning standard. Elsewhere, the document makes two excuses: (1): ‘Too restrictive’; and (2): ‘Risks being superseded quickly as development occurs and may limit alternate [sic] design opportunities’.¹⁹ In other words, a public consultation procedure that claims to be ‘well informed’ quietly hedges its bets on this key policy issue, and reveals that the state’s approach as proposed in a major public consultation procedure is to have a transport policy that can change any time in the future at the whim of development applicants, and at the time of October 2021 public consultation cannot illustrate what ought to be a clear and well-articulated integrated transport policy for land subject to a major rezoning proposal.

A consultation such as this must be able to flag clear future integrated transport policy for each zone and sub-zone, especially given that there are at least three described proposed future development concepts: (1) a multi-storey car park near the W&CH, west of the railway corridor; (2) a colossal Riverbank Arena west of the Morphett Street bridge, immediately adjacent to Torrens Lake; and (3) shops and tourism hubs and ‘on water’ forms along the northern side of the river and lake. Two other sites for potential future built forms are hinted at, one adjacent to Botanic High, and others north and south of the Intercontinental Hotel. These are is not described. (At page 29 a particularly opaque statement appears with regard to the Intercontinental site: “Built form policy [refinement] in the area in between the front of the [hotel] to North Terrace *facilitates an appropriate scale of development.*”) Moreover, under the proposed revised City Riverbank Zone, other complying development could comprise multiple other forms, including convention centre, educational establishment, helicopter landing facility, serviced apartments or tourist accommodation ((pages 49–50). Obviously, the lack of a Master Plan for the whole of the Riverbank Precinct is a major flaw of this consultation.

Additionally, nowhere in the document (or elsewhere in other consultation documentation) is there an explanation of the practical consequences of minimal or nil Deemed-to-satisfy or Designated-performance-feature criteria – illustrating what amounts to a rigour-free assessment model for those submitting future development applications under the proposed revised code.

d) The explanatory material in Appendix Attachment D (‘Strategic Planning Outcomes’ makes a claim (page 80) that ‘The code amendment promotes the delivery

¹⁸ Ibid. ‘Analysis’, 4.1 Strategic Planning Outcomes; Integrated Transport, page 11.

¹⁹ Ibid. page 35.

of **quality and contemporary design outcomes/improved public realm** for development in the affected area.’ Several responses to this arise.

Firstly, the consultation documents at no stage present any Master Plan for the entire Riverbank Precinct or even drawings or concept plans for the entire precinct to evidence that the rezoning and code amendment proposal would deliver ‘quality and contemporary design outcomes...’ (whatever that means).

Secondly, if ever they are presented in the form of development applications, if the rezoning and code amendment has been approved there will be no requirement for public notification to the SA public (ie non-adjacent land lessees or owners) because the proposals will be categorised as ‘complying’ development (to use the old language), and given that there will be no public opportunity to participate in the assessment process there will never be any requirement for PlanSA or other commercial development proponent to publicly demonstrate the claim of ‘quality and contemporary design outcomes’.

Thirdly, there is no evidence in the public consultation material that the rezoning and code amendments would deliver an “‘improved public realm’ – whatever that means to non-expert readers. Indeed, there is substantial public suspicion (mutually held by the Adelaide Park Lands Authority in the middle of this public consultation as at 30 September 2021) that the proposal would deliver the opposite result, given the detail already on the public record about likely heights, bulk and scale of contemplated built form development, as well as lack of code rigour that ought to specify detailed zone interface management requirements. Plan SA on page 29 claims that its proposals for code amendment are to be ‘contemporary and [will meet] community expectations’, via ‘appropriate management’ of the interface between zones to achieve ‘high amenity’, presumably contributing to that elusive concept, an ‘improved public realm’. This merely presents as semantic jargon.

Moreover, the concept of ‘appropriate management’ of the interface between zones is not accompanied by rigorous Deemed-to-satisfy or Designated-performance-feature criteria – strong evidence that state planners are offering no practicable mechanism to deliver on the assurance. Far from meeting ‘community expectations’ this weakness underscores a perception that the community anticipates the worst.

2. Riverbank Strategic Review background material not provided

Insufficient background information is provided in relation to investigations and conclusions of the Capital City Committee review²⁰ (informed by investigations through Renewal SA and the State Planning Commission), and subsequent state cabinet determination to change certain sites zoned Adelaide park lands into sub-zone construction sites. The source motivation, to adopt ‘integrated planning’ and to focus it on what PlanSA describes as ‘underutilised areas of the Riverbank’, ought to have been explored in detail in this consultation. This is about transparency – or lack of it. PlanSA ought to have explained how it was able to conclude that, in relation to the Riverbank Precinct, the state could ‘provide an orderly sequence of land development’²¹ (not articulated in this consultation); how it could ‘enable the cost-effective and timely delivery of infrastructure investment’ (also not articulated); and do this in a way that is ‘commensurate with the rate of future population growth’.²² The Renewal SA and State Planning Commission investigations no doubt did explore and analyse this critical information, but it is not accessible through this consultation. This flaw underscores the claim that the consultation is not well informed, and lacks transparency.

The failure to reveal the contents of the planning investigations makes it impossible to fully comprehend the motivations behind the planning change imperative, with exception, perhaps, to the need for a new W&C Hospital (but not an ancillary car park proposed for a site in an adjacent park lands zone, to be rezoned for the purpose, when it might have been placed above the adjacent railway corridor). Having omitted key information about other proposed Riverbank Precinct built forms (which would emerge in a Master Plan for the entire precinct), the substance of the public consultation focuses on a discussion riddled with academic planning complexities as if respondents are experienced, practising planners fully trained in the purpose and function of planning instruments such as the very recently activated code.

In effect this public consultation says to likely respondents: ‘Never mind the park lands’ context and a current Planning and Design Code that features desired outcomes that ostensibly claim to protect the park lands zones from permanent built form. Instead, focus on the intricacies of revising a very recently adopted code that was ostensibly appropriate and fit for purpose for the Riverbank Precinct the day it was brought into operation (19 March 2021) but within six months is not longer fit for purpose in relation to the Riverbank Precinct.’”

²⁰ Ibid, 4.1.4, page 13.

²¹ Ibid. State Planning Policy, extract *Policy 1.2*, as reproduced in table on page 80.

²² Ibid.

3. Minimal opportunity to influence the outcome

Effectively an 'information only' procedure

With exception to high-level technical land-use or code detail, the suggestion that other aspects discussed in this public 'consultation' procedure could be *influenced* by respondents to the consultation is misleading. This consultation is, in effect, an 'information only' notification to the SA public about a Riverbank Precinct state planning determination ready to be implemented in the form of a final draft. On page 10 of the PlanSA document²³ it is made clear that *only two aspects* could be influenced:

- "Issues and or opportunities that should be considered in the preparation of the code amendment";
- "The Code spatial layers and policy applying to land within the affected area."

The preparation of the code amendment arises as a result of a state cabinet determination based on substantial investigations. But as already noted, during this consultation period the public was not informed – in comprehensive detail – of the state investigations leading to state cabinet's determination to rezone. This content is critical, because it is only via full access to such material that likely *unexplored* issues and/or opportunities may be identified.

Policy is presented as a *fait accompli*, as illustrated in the contents of Appendix Attachment C – 'Proposed Code Policy' – a revised planning and design code ready to implement. But there is unlikely to be any opportunity for non-expert public respondents to influence any of the content of these zone and sub-zone Assessment Provisions (APs). This is because very few public respondents from 'the broader South Australian community' are experts in planning policy and the crafting of instruments such as the planning and design code. (Historically, very few potential respondents had experience in the writing of the (now redundant) Adelaide (City) Development Plan's provisions for the Adelaide park lands, before it was replaced by the new code.) The state cabinet 'deliverables' anticipated via this proposal can only be fully realised if the APs in Attachment C survive intact after the close of the public consultation. Notably, there are few Deemed-to-satisfy (DTS) or Designated-performance-feature (DPF) criteria presented in most of the proposed new APs, and this may be for good reason. To allow for quick planning consent approval, and later development consent approval, the lack of rigour could be administratively important for various state portfolios as well as other commercial interests when lodging development applications. In other words, minimally demanding assessment criteria for proposed future land-use development in the newly rezoned sites will be critical if state cabinet's unpublished schedule is to be followed.

State correspondence confirms urgency to commence

The public has no access to this schedule; however, state correspondence with the City of Adelaide in September 2021 made clear that there is already a particular urgency to begin works relating to the W&C Hospital. A council agenda paper confirmed the government's urgency. "On 3 September 2021," it reported, "the Lord Mayor [Sandy Verschoor] received a letter from the Chief Executive of the Department of Health and Wellbeing, requesting the transfer of land that is in council

²³ Ibid, page 10.

care and control that would be required for the [Women’s and Children’s Hospital] proposal to the Minister for Health and Wellbeing.”²⁴ The agenda paper also noted that: “Early [W&CH] site works are proposed to commence by the end of 2021 with construction works to commence in late 2022.”

The fiction that ‘engagement is occurring early’

The state’s correspondence with the City of Adelaide revelation reveals the fiction that PlanSA consultation ‘engagement’ is occurring ‘early’ under Charter criteria 6, that is, ‘Engagement occurred before or during the drafting of the planning policy, strategy or scheme when there was an opportunity for influence.’²⁵ Very clearly, the proposal is not a ‘first draft’. On the basis of state communications with the City of Adelaide, it is obviously a final draft with respect to the W&C Hospital concept and ancillary car park proposal for the Adelaide park lands zone. The *Engagement Plan*’s document ‘indicator’ reads: ‘Engagement occurred early enough for feedback to genuinely influence the planning policy, strategy or scheme’. The evaluation tool wording is not selected by the state author in that document; however, of the four options listed for selection on page 17 the most feasible might be ‘Engaged when there was an opportunity for minor edits to final draft’. But additional delay to incorporate these and repeat the consultation is highly unlikely to occur in a circumstance where the state government is facing a state election in five months’ time (March or April 2022), and where state correspondence with the City of Adelaide has already flagged early site works in relation to the W&C Hospital development. These aspects suggest that the consultation could be more realistically described in mid-October 2021 as ‘Engaged when there was no real opportunity for input to be considered’.²⁶ As such, it is not a genuine consultation, nor is it inclusive or respectful.

The fallacious assumption that non-expert respondents have a detailed understanding of SA state planning policy and practice

In response to the second potential ‘influencer’ (“The Code spatial layers and policy applying to land within the affected area”), it is fallacious that there is a likelihood that public respondents have a detailed understanding of SA state planning policy at a City of Adelaide planning and design code instrument level (assuming perhaps a degree or a doctorate?). Some ‘key stakeholders’ will have the capacity to pay for expert advice, to be transferred to their submissions, but many thousands of public respondents will not have such capacity. Their ability to *influence* will be minimal. They are described in another PlanSA document accompanying the consultation as “the broader South Australian community”.²⁷ For them, the procedure appears arrogant, demanding, and unreasonable. It is not a genuine consultation, nor is it inclusive or respectful.

²⁴ City of Adelaide, Council, Agenda, ‘Riverbank Precinct Projects Strategic Alignment – Enabling Priorities’, Item 10.14, 14/09/2021.

²⁵ Government of SA, *Engagement Plan*, Riverbank Precinct Code Amendment, Chief Executive, Attorney General’s Department (21 pages, undated), ‘Measuring success’, Criteria 1-9, page 17.

²⁶ Ibid, Table: Measuring Success, Evaluation Tool, (fourth of four), page 17.

²⁷ Ibid: list on pages 11–12.

The misrepresentation of facts relating to legislated park lands policy instruments under the Adelaide Park Lands Act 2005

With respect to ‘Policy applying to land within the affected area’, PlanSA in its consultation documentation does not make clear that there is an important distinction between state planning policy (manifested in the proposed code) and local government Adelaide park lands’ management policy, evolution of which is managed by the park lands’ custodian, the City of Adelaide. This is a requirement under the *Adelaide Park Lands Act 2005*. Two policy instruments are mentioned in the consultation.²⁸ But PlanSA disingenuously does not reveal critical facts reflected in these instruments.

For example, PlanSA’s consultation references the *Community Land Management Plan* but does not make clear that this plan does not contemplate the major construction projects described (hospital, hospital car park, arena, river-edge built form). Further, PlanSA’s references to the *Adelaide Park Lands Management Strategy 2015–25* fail to make clear that the Strategy also does not contemplate these specific projects.²⁹

These two documents are the two core policy instruments cited in the *Adelaide Park Lands Act 2005*, but it is clear that PlanSA planners do not see them occupying any critical legal assessment role relating a proposed revision of the design code and future development proposals across the Riverbank Precinct. Omission of reference to lack of policy support by the City of Adelaide for most of the projects proposed for the Riverbank Precinct rezoning bid (via the council’s legislated park lands instruments under the *Adelaide Park Lands Act 2005*) is a major flaw. It has the potential to significantly mislead many respondents.

²⁸ Government of SA, *Riverbank Precinct Code Amendment*, Chief Executive, Attorney General’s Department, approved 10/9/21 – source: page 16.

²⁹ Ibid. Section 4.1.4, “Adelaide Park Lands Management Strategy 2015–25”, page 16.

John Brown

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: john

Family name: Brown

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The parklands remaining a green, open PARK area free from built developments is a mandate and responsibility from previous generations that we must protect for future generations. The parklands are a key heritage aspect of our state which must be preserved under all circumstances. The idea alone of such changes to parklands zoning is dispicable and is a disgrace to the visionaries who established Adelaide. Development should be confined to the CBD area in line with Colonel Light's vision of Adelaide and to assist in supporting struggling CBD businesses. This proposal is a very clear attempt to erode South Australia's heritage parklands for the sake of profits to the business friends of politicians who have no interest in the public good. Under no circumstances should this amendment be permitted!

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sent to
proponent email: plansasubmissions@sa.gov.au

John Davidson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: john

Family name: davidson

Organisation: Nil

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please leave the Adelaide Parklands intact for public recreation and the open space healthy life enjoyment of everyone - do not desecrate this space for lack of planning elsewhere ! This is not and never was allocated for private profiteering.

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sent to
proponent plansasubmissions@sa.gov.au
email:

John Eyre

Please find my submission attached
Wendy Eyre

Link to submission is broken in email.

John High

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: John

Family name: High

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am very concerned by the way that areas of the Parklands are being treated as 'free land' ripe for 'development'. The very idea that Pinky Flats should be used as a site on which to build shops, cafes, and bars is outrageous. It is an ideal picnic spot alongside the river for people to relax and enjoy. With the huge growth of apartments in the CBD, the demand for green space for recreation will become critical. All that Pinky Flats would benefit from is more shady trees, places to sit, a couple of electric BBQ's, and diagonal parking along the roadway similar to that near the Tennis Centre. With the addition of a toilet facility similar to that in Hindmarsh Square the space would become a perfect location for picnic.

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proponent plansasubmissions@sa.gov.au
email:

John Lattin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: John

Family name: Lattin

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The proposed Riverside Arena and the entire Entertainment rezoning is a terribly flawed use of public parklands space. You can't take Parklands. I attended a lovely picnic there on Sunday. If Paul McCartney came to Adelaide he'd pull a much larger crowd than 15,000, the Arena wouldn't be big enough, he'd have to play Adelaide Oval. With the Women's and Children's hospital being built nearby with the RAH already full to the brim, what we need is open space for families attending the hospitals to play, and people to be human in nature. Bonython Park is full, swamped with events half the time and insufficient. To say nothing of the parking and traffic congestion stress. Liveable cities need walkable recreation options. We just need an accessible park there. Preferably without all the dumped building rubbish. And a bridge from the RAH new WCH to allow people to get there. Not a 15,000 seat turkey!

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sent to
proponent plansasubmissions@sa.gov.au
email:

John Mancheff

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: John

Family name: Mancheff

Organisation: N/a

Email address: [REDACTED]

Phone number [REDACTED]

Comments: Before doing making any changes to the riverbank precinct there must be a massive effort to widen the river and deepen the lake then make sure the water is clean and protected from upstream pollution. At the moment it looks like one of the most neglected bodies of water in Australia.

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proponent plansasubmissions@sa.gov.au
email:

John McCarthy

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

John Pockett

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: John

Family name: Pockett

Organisation: former Adelaide Council resident

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am deeply troubled by this Riverbank Precinct Code Amendment proposal because, if the construction of private hotels (IN the Parklands) near the Festival Plaza and Adelaide Oval was was continued encroachment, this code amendment can be likened (and I do not use the term lightly) a "rape of the Parklands". Remember that the Aust. National Heritage listing was "an enduring treasure for the people of South Australia and the nation as a whole" and not for private apartments, hotels, shops, multi-storey carparks, helicopter pads, etc. If I were a hotel owner between Light/Hindmarsh Squares and North Tce. I would be livid that there was the likelihood now for more hotels to be competing (with cheap land) in my turf and, under the code amendments, with no recourse if a State govt of any persuasion wanted to push it through. I also see no reason that the Innovation precinct take over a lovely section of parklands when they would be closer to Lot Fourteen if they were on/near Grenfell St near Tandanya/Squatters?? Arms Hotel. What place is there for "Light Industry" to be taking over parts of the parklands. It is sleight of hand to name the Carpark area over/near the historic Adel Gaol a "Health" useage. Again moving public land into private (presumably Wilson or the like) !! I am not a stick-in-the-mud person but see the pillaging that will happen after the Code Amendments are in place an enablement for privatising the public lands we still have for private cheap land under the whim of the SA Govt. of the time and without any recourse. I love the parklands and use many different parts of them a lot. The nibbling away at them has already been bad enough but this makes the whole game open slather.

sent to
proponent
email: plansasubmissions@sa.gov.au

John Turnbull

Please find Attached.

Can receipt be acknowledged please>

Regards John Turnbull

Submission: Parkland Re-Zoning Proposal: Riverbank Precinct Code Amendment.

John and Ann Turnbull

Gilberton SA 5081

Introduction

Adelaide is rated the world's third most liveable city², based on five categories one of which is 'culture and environment' which would logically include the City Parklands.

The Adelaide Parklands (Colonel William Light's vision for the Adelaide City in 1837) were, in 2008 entered in the Australian National Heritage List. The laying out of the City of Adelaide was Light's greatest achievement.... "his plan was brilliant, in its sites, its sensitive relation to topography and climate, its wide streets and squares and its belt of parklands"³.

There currently is a push to have Adelaide declared a National Park City.⁴

The proposed Zoning changes could jeopardise these national and international standings for Adelaide. (It is noted that the State Government has delayed for over two years acting on a recommendation to give State Heritage protection to our Adelaide Parklands; see later Planning Complexities.)

Our submission rejects the Re-Zoning proposal.

Women's and Children's Hospital

The construction of this hospital appears a fait accompli.

A part of the Re-Zoning proposal is for a three- storey carpark for the new section of the hospital. It should NOT be built on any sector of the Parklands.

Lord Mayor Sandy Verschoor has suggested that a carpark be built over the existing Adelaide Rail Yard.

We advocate the building of a multistorey carpark on either North or West Terrace and provide, from there a dedicated Park and Ride Service to the hospital(s).

Proposed Riverbank Arena

The proposed 'entertainment' Re-Zoning including but not limited to a \$660 million stadium (aka Riverbank Arena / stadium) should NOT be allowed!

² The Economist Intelligence Unit's Global Liveability Index

³Dutton 1960 p. 213 - 17

⁴London based National Parks City Foundation

If such a stadium is to be countenanced (is money available?) then the State Government should consider the present Entertainment Centre site together with the soon to be developed (? zoned) Brewery site.

Premier Marshall opines that the parkland area targeted for the proposed Riverbank Arena is 'degraded' and 'under utilised'. The logical response is to reclaim it with a remediation program and associated planting.

The University of South Australia and the University of Adelaide high rise towers overlook such a proposed rejuvenated parklands section. An upgraded Helen Mayo Park could become a significant attraction for university staff and students (including anticipated increased international enrolments.)

There are many examples of successful parkland reclamation and remediation along the River Torrens – KarrawirraParri. The St. Peters River Park incorporating the Linear Path, the Billabong and the L.G Perriam Oval have been acknowledged as 'a sensitive contribution to the built environment'. The new oval was, for decades, a rubbish dump with all the associated environmental hazards. The reclaimed Billabong is now recognised as 'a valuable recreation and educational facility for the entire community. 'Degraded' parkland becomes 'reclaimed and restored'.

Pinky Flat

Any possible 'upgrade' of Pinky Flat should, firstly be discussed by Council (and possibly the State Government) with Kaurna representatives who historically camped all along the, then, series of waterholes of KarrawirraParri. We oppose any development there.

We support the maintenance of the pedestrian and cycling tracks that presently exist along the riverbank / Linear path. There is no need to add to the present cafes and restaurants at the Festival Centre, the Weir and the Adelaide Oval.

Planning Complexities

Proposed Planning Code: 'baffling complexity'

Bridgland's Opinion piece (October 2021) outlines how for 'the uneducated public the 15/9 to 27/10 consultation essentially capitalises on confusion as a strategy' to fully comprehend the implications of the planning proposal. The bureaucratic jargon and planner semantics are incomprehensible to many of the general public. Further the process has already attracted widespread criticism from private planning experts, as well as many local councils.

City Council V State Government

Who has the final say?

What does the present legislation state?

Is there sufficient funding available for Parkland upkeep?

Would an Adelaide Parkland Lottery be a possibility?

Finally

1. We have outlined our views about carparking for the Women and Children's Hospital and the Riverbank Arena proposal.
2. We reject the Re-Zoning of any part of the Adelaide Parklands.
3. Adelaide's (Light's) figure – eight of parklands is a treasure; it should be valued as such and not continually tampered with.
4. We have serious concerns about the rushed, confusing planning process.

Rally, Helen Mayo Park, Sunday, October 17

We attended this Rally. The speakers – as published were:

Shane Sody, Adelaide Parklands Association President

he noted 'No Government member here today and Lord Mayor unavailable.'

Phillip Martin, Adelaide City Councillor

- Described proposed rezoning as a *'landgrab'*

Robert Simms, MLC The Greens

- Concerned re possibility of private penthouses in proposed residential development... *'A Trojan Horse'*.

Lucy Hood, SA Labour candidate for Adelaide

- *'why cant the Marshall Government justify their stadium at this meeting?'*

Dr. Jane Lomax – Smith, former Lord Mayor, former Member for Adelaide

- *'incremental nibbling' at the Parklands... madness of proposals, massive landgrabs... must not be enshrined in laws... 70 hectares being treated as a development site!*

Reference

Bridgland, John. Opinion: October 2021

Riverbank – Adelaide parklands rezoning bid capitalises on new planning codes baffling complexities – and gambles on a political race against time.

Dutton, Geoffrey. Founder of a City, Melbourne, F.W Cheshire, 1960

Jory, Rex. Why not allow high-rise housing development in the parklands on the northern side of Greenhill Rd? The Advertiser, 2021 – 10 – 04

Marsh, William. What are we preserving? City Mag, The Parklands Edition, Issue 32, Spring 2021

John and Ann Turnbull

[REDACTED]

[REDACTED]

SA 5081

Ph - [REDACTED]

[REDACTED]

Jonathan Harry

The current rezoning is a continuation of the former Government's proposal to consolidate the Health precinct as well as promote other development upon the opposite bank to the RAH as well.

The Planners concept was to emulate the South Bank on the Yarra River, Melbourne.

Unfortunately, in the same bid for populism, the present Government wishes to implement that concept upon a waterway that is basically a creek in summer, not a River. It requires potable water to prevent toxic algae, and a great deal of Taxation Revenue to supply that "lake" within a drying climate.

While there is sense extending the Health precinct, there is none adding further building development apart from that on the Southern bank, and definitely not on the Northern Bank.

Adelaide does not need to reduce its Green Space to emulate very superficially Melbourne.

I urge an absolute embargo on more Stadiums/Convention centre extensions on the South Bank, and retaining for all time the Park Lands on the Northern Bank to enhance the existing development on the South Bank.

It is incredible that the Property Council, its developers etc and certain members of the present Government do not value the South side of the Torrens Lake for its inherent ability to reflect most of the development that has taken place on the North bank.

I hope Parliament brings an end to this inappropriate Planning extension.

Regards,

Jonathan Harry

Jonathan Richer

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jonathan

Family name: Richer

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Great to have some dining / cafes by the river but please keep the running paths unobstructed as I use the Torrens paths most days.

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sent to proponent email: plansasubmissions@sa.gov.au

Submission two:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jonathan

Family name: Richer

Organisation:

Email address:

████████████████████

Phone number:

██████████

Comments: Great to have some dining / cafes by the river but please keep the running paths unobstructed as I use the Torrens paths most days.

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sent to proponent email: plansasubmissions@sa.gov.au

Jonathan Wenberg

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

I find I particularly troubling that the wonderful natural area for all is being treated purely as a developer oportunistic cash cow that well lead to less access for the public to nature within the city.

Sincerely,

Jonathan Wenberg

Josephine Mercer

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Josephine

Family name: Mercer

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Like councillors Martin Moran and Snape I do not support further alienation of parkland. It is for public use and there has been encroachment enough

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sent to proponent email: plansasubmissions@sa.gov.au

Submission two:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Josephine

Family name: Mercer

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am disgusted at the prospect of more “commercialisation” of the parklands. The parklands are one of the most endearing features of Adelaide - wonderful for families, for people just wanting to wander by the river and enjoy the peace, the birds, the gardens and trees. Do not spoil it e.g.by putting shops on Pinky Flat!

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sent to
proponent plansasubmissions@sa.gov.au
email:

Jude Scarborough

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Jude

Family name: Scarborough

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The Adelaide Parklands, together with parklands around other South Australian government towns, are a significant part of South Australia's heritage & identity. For good planning reasons, the open space parklands were established to enhance the living environment of urban residents & the quality of the urban environment more generally. The current proposal to rezone a large percentage of the central parklands provides for the alienation of that land for built up purposes, which is inconsistent with the original purposes of the parklands, and will allow development that restricts public access & reduces natural open spaces. I am a regular user of the open spaces involved in the rezoning proposal for walking, exercising and generally enjoying the open space with my family. This use will be significantly degraded if this proposal proceeds. For these reasons, I strongly oppose the changes, including proposals for land division and seek their rejection.

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proponent email: plansasubmissions@sa.gov.au

Judith Francis

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Judith

Family name: Francis

Organisation: Pioneers Association of SA Inc

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments:

The consultation process of 6 weeks is too short to allow all affected and interested individuals and groups to discuss the proposal and research consequences. This is a proposal of wide-reaching impact on lands which belong to the current and future citizens of South Australia, while also having important cultural links to Kurna peoples and heritage value for all South Australians. They have been under the judicial care of the Adelaide City Council who have created wonderful public spaces. The parklands of Adelaide form an integral part of the plan set out by Colonel William Light for the city in 1837 and were based on the premise that citizens need recreational areas, a space which provides a green border separating commerce and villages, a place for the community to enjoy nature and provide homes for animals and birds. The River Torrens was the life giving water supply for the Kurna people and the early European settlers. It was an irregular supply; often a stream, or a series of waterholes or billabongs and at times a roaring torrent. The river meanders through the now built up city environs and complements the current existing parklands, bringing visual relief from cement and concrete as well as refreshing the air and bringing cool breezes to the city. For millennia the river has wandered down from the hills, making its own path. We have tamed it and channelled it for our own purposes but what remains must be preserved. The natural undisturbed sections are unique in terms of metropolitan infill around the world, we need to cherish and ensure it is sustainable and recognised as a 'point of difference' in a frantic and often turbulent world. Early colonial development with in surrounding lands must also be valued and celebrated. Colonel Light envisaged that public buildings & crops to benefit citizens within the city would be established. The remnant olive groves, the Old Gaol, the Police Barracks, link us to past development and this heritage must remain.

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sent to proponent email:

plansasubmissions@sa.gov.au

Judith Knott

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

The Parklands are necessary for the health and beauty of Adelaide. They are our heritage to pass on to future generations. They have already been decimated unforgivably. Adelaide is full of ugly and under utilised buildings already. It is no longer full of open Green spaces. Shame on this government to even consider such a proposal which benefits developers only.

Sincerely,

Judith Knott

Judith Thomas

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Judith

Family name: Thomas

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I'm against any future changes to our existing parklands. Please look for other sustainable and nature-friendly solutions. We want our children and future people to be refreshed and invigorated by nature in a continuously world of change; technology and despair. People can gather without manmade cafes and the school students can also benefit from a free and natural space. Research around the world has shown the importance of retaining the natural world for not only its people but for the flora and fauna. Please show mercy to the existing parklands.

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sent to proponent email: plansasubmissions@sa.gov.au

Judy Fander

To our representative government in a democratic state,

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

I am appalled by the continual pressure from a few powerful people to override the wishes of the many ordinary citizens who enjoy the present beauty of our heritage park lands, one our most precious assets. Put the build infrastructure elsewhere please, or abandon it. Judy Fander

Judy Parham

Minister,

You have to admit that Adelaide city has very few natural attributes. The Torrens River is really a plugged up creek.

Adelaide and north Adelaide is said to be about 7 square kilometres, and initially the city was surrounded by about 12.95 square kilometres of Park Lands. This has been gradually whittled away by governments over the years!

It is Adelaide's ONLY crowning glory.

Please do not encroach on it any more. Use your imagination to reuse existing commercial land.

Surely in these times with our threatened environment, leaving existing Park Lands is the most positive action you can take for the future.

With heart felt wishes,

Judy Parham

Judy Rees

I want our Adelaide Parks to stay protected for all South Australians.

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Environmentally our parks are essential, to absorb the pollution, cool the city, provide shelter and habitat for birds and wildlife. How much more can subsequent Governments erode our parklands?

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours with concern,

Judy Rees.

Judy Thain

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

I am a country girl, who has lived in the city since 1970, and value very highly the ability to visit and enjoy any and all of the many parklands we currently have. Every weekend we walk our little dog in a different part of the Parklands.

Several years ago, we visited Melbourne for the first time in many years, and were horrified to see the banks of the Yarra filled with multi-storied buildings. People visit, but only to buy lattes & be seen. There is very little open space and room for children to play. Please, please don't let Adelaide become another Melbourne.

I really don't believe you have the moral right to change the gazetted use for buildings, shops and kiosks.

Please reconsider – the beauty and amenity of Adelaide is at stake here.

Sincerely,

Judy Thain

Kingswood 5062

Julia Langrehr

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please don't allow development of these park lands.

Julia

Julia Miller

To Whom It May Concern,

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Thank you,

Julia Miller

Julie Bennett

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Julie

Family name: Bennett

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: 1. Ever heard of Colonel Light? He had a vision for Adelaide CBD to be surrounded by a green zone. You've already taken a chunk of the Botanic Gardens for the old Hospital. Parks and gardens have disappeared under Festival Centres and Adelaide city oval. Enough is enough. Chopping up our green spaces is criminal and should be stopped. 2. North Terrace is the wrong place to build the Womens and Childrens hospital. Build it in Hindmarsh where there is more land for adequate car parking with excellent access to public transport. Leave our parks and gardens alone. Politicians should hang their heads in shame for suggesting it. Future generations will be asking what do trees and lawns look like?

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sent to
proponent email: plansasubmissions@sa.gov.au

Julie Chamberlain

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Julie

Family name: Chamberlain

Organisation:

Email address:

[REDACTED]

Phone

number:

[REDACTED]

Comments: If you want health, entertainment, and culture on the riverbank, why not remediate the degraded parts of it thus improving its health, walk along it in the early morning for the most health-giving entertainment anyone could wish for, and respect the culture of the actual land itself which has been around for many thousands of years. Longterm thinking PLEASE!!!

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sent to

proponent plansasubmissions@sa.gov.au

email:

Julie Myers

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: julie

Family name: myers

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please reconsider this destructive rezoning that will encroach on Adelaide's beautiful History of the Old Adelaide Gaol and SAPOL Barracks. Past history of the Government protecting heritage listed buildings gives me little to no confidence for the future of these beautiful buildings if this plan goes ahead. Not to mention the possible disturbance of graves that are within the gaol grounds. Im sure there is an alternative that would be better suited for the needs of South Australians that can maintain it's amazing and educational History.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Julienne Lenain

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Julienne

Family name: Lenain

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Adelaide has been described worldwide as one of the most liveable cities. The location next to the River Torrens and the Parklands is unique and highly coveted by visitors to our cities. Family members who live in the UK, France and Belgium are envious of this beautiful setting which we need to nurture, holding true to the vision of Colonel Light. The proposal has wide ranging implications and is far more than just addressing the important development of the proposed new Women's and Children's Hospital. To sacrifice land next to the River Torrens for car parking is unforgivable. Alternative thinking, such as underground parking, must be applied to solve this problem, despite the cost. Money, which would have been allocated to an arena, would be far better allocated to a sustainable parking solution. There should be no rezoning for 'small-scale development' along the riverfront. As soon as any rezoning occurs, the public will no longer have any say on what can or can't be put there. Pop-up structures can contribute to the activation of the riverfront simultaneously protecting the Parklands, adding variety and entertainment. Climate Change will have a dramatic effect on all cities in the world. The cooling effect of our Parklands is imperative to help counteract the radiant heat produced by the hard surfaces of our buildings and roads. The biodiversity linked within our Parklands is a critical addition to the health benefits of our inner city. This 'Proposal to Initiate' affects all South Australians. It is changing the vision of our city riverbank and as such the decision should be subject to a Referendum or at least the agreement of both parties of government.

sent to
proponent email: plansasubmissions@sa.gov.au

Justin Ross (Riverside Rowing Club)

Good afternoon,

The attached is a submission by the Riverside Rowing Club Inc. regarding the Riverbank Planning Amendment proposal.

Regards

Justin Ross

President

Riverside Rowing Club.



Riverside Rowing Club Inc.
PO Box 477 Tynte Street North
Adelaide SA 5006

Code Amendment Team Planning and
Land Use Services Division Attorney-
General's Department GPO Box 1815
Adelaide SA 5001

25 October 2021

Dear Sir/Madam

I refer to the planned Riverbank Planning Amendment, and in particular, the extension of the Entertainment Subzone and creation of the new Riverbank Subzone.

The Entertainment Subzone is proposed to be extended west of Montefiore Road and our advice is that it would directly affect the Riverside Rowing Club and Pulteney Boat Club and a proposed future development would further effect 4 other Rowing Clubs to the East of Montefiore Road

On reading the draft amendments to the Entertainment Subzone it is apparent that they do not include provision for Rowing Facilities and indeed while they provide for many other uses including new uses there is no sport, sporting club or rowing use listed. Given that commitments to date are that our Rowing Club would be accommodated into a proposed new development in the Subzone it would seem appropriate that use of the land for the purposes of rowing clubs be incorporated into the Assessment Provisions for the Entertainment Subzone.

Land Use and Intensity	
PO 1.1 Development of a range of cultural, parliamentary, office, entertainment, retail, conference and ancillary land uses.	DTS/DPF 1.1 None are applicable
PO 1.2 Residential development only where it is demonstrated that noise, light spill and other impacts on residential amenity associated with the envisaged mix of uses and a vibrant public plaza can be adequately addressed.	DTS/DPF 1.2 None are applicable.
<u>PO 1.3</u> <u>A range of health, education and research facilities may also be developed west of Montefiore Road to complement existing and emerging health-related activities in the adjacent Health Subzone.</u>	<u>DTS/DPF 1.3</u> <u>None are applicable.</u>

The proposed Riverbank Subzone is an excellent proposal to preserve the River Torrens as a key feature of the city and its landscape. We note from your diagram of proposed Sub Zones that the Riverbank Subzone and Entertainment Subzone overlap west of Montefiore Road. Our comments above related to the Entertainment Subzone therefore apply to the Riverbank Subzone also.

Specifically in relation to the Riverbank Subzone we note the Desired Outcomes below particularly DO 1. While this could be inferred to include the sport of rowing we believe that rowing on the Torrens having a history of over 100 Years that an additional desired outcome should be:

DO 3 Development of the River Torrens in a manner that does not conflict with the long term history of the sport of rowing and enables its continuance.

Riverbank Subzone

Assessment Provisions (AP)

Desired Outcome (DO)

<u>Desired Outcome</u>	
<u>DO 1</u>	<u>Activation of the River Torrens through the provision of both on-water and off-water development sensitive to the Park Lands setting and heritage values of the area.</u>
<u>DO 2</u>	<u>Development maintains an open landscaped character which optimises river views and vistas in key locations.</u>

Further in relation to the Riverbank Subzone due to the overlap with the Entertainment Subzone mentioned above we believe that the land use as written up may not provide for the proposed rowing clubs. While premises including community, cultural, tourism, shops and licenced premises are listed there is no mention of sporting clubs and facilities and specifically rowing clubs. We believe the Assessment provisions would be improved by the inclusion of sporting clubs and preferably rowing clubs more specifically.

<u>Performance Outcome</u>	<u>Deemed-to-Satisfy Criteria / Designated Performance Feature</u>
<u>Land Use and Intensity</u>	
<u>PO 1.1</u> <u>A diverse range of community, cultural, tourism, shop or licensed premises located adjacent to the River Torrens:</u> <u>(a) that are directly related to, and complement, the role and function of the riverbank precinct</u> <u>(b) positively contribute to Adelaide Park Lands activation and setting.</u>	<u>DTS/DPF 1.1</u> <u>None are applicable.</u>

The document pertaining to the Riverbank Precinct fails to provide for the rowing clubs on the Torrens River, and fails to specifically provide for the historical sport of rowing. Rowing has been an integral ingredient of the life of the River Torrens for a period in excess of one hundred years.

Rowing boats can be seen travelling up and down the river, bringing life to the city centre, and encouraging bystanders to participate in a healthy outdoor activity. Clubs hold regattas on the Torrens and these are witnessed with interest by the general public. This activity is an essential part of life in the city. Given its historical significance, Rowing on the River Torrens needs to be provided for in the Assessment Provisions for the Entertainment and River Bank Subzones and possibly more broadly in the Riverbank Precinct.

Riverside Rowing Club would request the opportunity to show our premises and present our views to the Code Amendment Team to ensure that our feedback has been interpreted correctly. If you can advise if this would be possible we will arrange a suitable date and time.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Justin Ross', with a long horizontal flourish extending to the right.

Justin Ross
President
Riverside Rowing Club

Kalyna Micenko

Dear Premier Marshall,

Minister Sanderson and

Planning Submission Authority,

I love our Adelaide Parklands.

I love spending time in the Adelaide Parklands, walking through the Adelaide Parklands, enjoying the trees and being in touch with nature.

I reject the rezoning of any part of the Adelaide Park Lands.

I reject building and development on our Adelaide Parklands.

I want our Adelaide Parklands to continue to be a green belt around our city. A place for people to be at one with nature. A place full of trees, flora and fauna- NOT buildings, carparks and developments.

With more people moving into flats in the city and suburbs- places with no or very little backyards or gardens - it is more important than ever that we retain the Adelaide Parklands that Colonel Light had the vision and foresight to give us. The parklands aren't spare space waiting for developments to be put on them. They are home to so much flora and fauna, they cool our city and warm our hearts each time we see them or spend time in them. In peaceful contemplation, at happy family picnics, as we jog through, walk our dogs, lie down and watch the clouds, hug a tree, breathe, these are the things that make the Adelaide Parklands are a vital part of Adelaide.

It is so very important that we don't keep building on the parklands. you need to stop right now and preserve what parklands we have left.

Can you imagine Central Park in New York being chipped away at for flats, hotels, light industry, entertainment, shops and multi storey car parks- no, the people and politicians there wouldn't have it, they understand how precious green open space full of trees and nature is. We should too, we should revere our Adelaide Parklands for the beautiful unique parks that they are. Take our parklands away and Adelaide is nothing special at all, just another convention capital.

I beg you not to rezone the 70 hectares you are currently considering. I urge you to stop building on our parklands, they are ours, not yours. Leave them alone please. If you don't, when will it stop?

Be the government that becomes applauded for putting a stop to development on our parklands. Please.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards

Kalyna Micenko

██████████

Port Adelaide 5015

██████████

Karen Griffiths

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Karen

Family name: Griffiths

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am saddened and so deeply disappointed reading daily of our history being lost to so called 'modern development'. Is there nothing left that is sacred to our olden times? We hear much about our valued history, yet it is becoming more and more evident that this history is taken by the bulldozer, by the Government grab and most importantly, lost to the Public view. The Adelaide Gaol is now on that endangered list and this is simply not acceptable. Adelaide is losing her beautiful old buildings hand over fist. Please consider how sad the day will be when all we and future generations can experience of our stunning historical buildings, is via a computer screen. Look at Europe and America and how many of their amazing old buildings are still standing and still publicly accessible. Their amazing history relatively intact. Adelaide is small on the scale of world cities, but we who live here love that fact. We love that our city is quieter, safer and still beautiful. We don't want a crowded concrete jungle full of pollution and modern buildings that are simply eyesores. We want our valued, beautiful and very important history left intact and accessible to all.

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sent to proponent email: plansasubmissions@sa.gov.au

Karen Shand

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: KAREN

Family name: SHAND

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Open space, riverbank and natural environment are at a premium now and will become more important for the future due to climate change issues, biodiversity and public health and enjoyment. Removal of the natural environment /riverbank would have a negative impact on these factors and therefore I do not support legislation to change the current status.

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proponent plansasubmissions@sa.gov.au
email:

Kate Elmes

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Kate

Family name: Elmes

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Stop building on the people of South Australia's parklands. As the councillor said it doesn't matter what the people think it's a done deal. I am voting on this one. I thought Rann was a vandal now I realise it's just dirty filthy politics. The Royal Adelaide hospital had a healing garden for the TB epidemic and the foundation of a Botanical garden emerged , one of the best in the world and breathing space parklands all around for the city. My Uncle Peter Hetzel and his brother Basil my father an ENT at the Adelaide Children's Hospital all knew the value of green space for botanical and bird bee flora fauna whatever why can't you leave the parklands be. The Waite institute has just had a toe cut off. This is just devastating again we have no say. A joke. Corrupt to the core. I know leaving a park to degrade is a way of saying it should be used for something productive like building a concrete slab on top with a few proxy token trees. You have no shame and your ugly as. Is Hickenbotham hosting another party for the Premier? Who are the people that build on the peoples park??

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Kate Elmes

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kate Lawrence

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Kate

Family name: Lawrence

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: To the Plan SA Team, I am writing to express my horror at the plan to re-zone the riverbank precinct in the Adelaide CBD to allow development of the area. Adelaide is world-famous as the "city-in-a-park", and is often commented on as one of the most beautiful cities in the world for this reason by those, such as myself, who have travelled widely. Further development of the parklands and riverbank precinct would be a completely inappropriate use of public land. Public land should remain just that, free for all to use and enjoy. With more people, especially around the CBD and immediate suburbs being forced into high-density housing, the importance of the riverbank precinct and associated parklands is more important than ever, for people to be able to engage in outdoor recreation activities and to enjoy green space. Removal of these public spaces would have long term effects on public mental health. These parklands also provide important refuges for wildlife, such as birds and fruit-bats. Development of the riverbank would greatly impact on the aesthetic, recreational and cultural value of Adelaide, and is a betrayal of Governor Hindmarsh's vision for Adelaide. Instead, this area can be activated with public events keeping in line with the areas current parkland status, such as community sporting events, arts and music festivals or even events exploring Adelaide's Kurna and colonial history. Please do not rezone this beautiful, peaceful and vital area. Do not follow in the footsteps of Melbourne's hideous Southbank precinct, but rather keep this area available to all South Australians to enjoy. Regards, Kate Lawrence

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proponent
email: plansasubmissions@sa.gov.au

Kate Treloar

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: kate

Family name: treloar

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource. I just looked through this consultation's Poll results and Guest Book comments and it is beyond clear this rezoning isn't supported. There is something very dodgy going on if it just goes ahead...

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sent to
proponent plansasubmissions@sa.gov.au
email:

Katherine Dennis

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Katherine

Family name: Dennis

Organisation: Mrs

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I reject the rezoning of any part of the Adelaide Parklands. These areas are not under utilised. The Government cannot measure the pleasure and sense of well being that our beautiful green, open and publicly owned parklands bring to a wide variety of people every day. These natural areas are one of the most lovely aspects of our city. The rezoning proposals and accompanying plans for entertainment and complementary activities, comprising ugly, souless buildings along the riverbank are abhorrent, and equate to planned despoilation and degradation, and a blatant push for private gain from areas which belong to the people of South Australia, not to the Government. These plans show great disrespect to all South Australians, and a wilfull desire to deny future generations the natural and unspoilt parklands which are their rightful heritage.

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sent to
proponent email: plansasubmissions@sa.gov.au

Katherine Grocott

To Whom It May Concern,

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

I came to Adelaide to study almost three years now. I now want to stay in this beautiful city. One of its amazing and unique features is the Parklands. They must be allowed to stay. We need green, wild spaces and clearing them for more development is short sighted, fails to think of future generations and destroys the one thing that makes Adelaide so special.

Please don't take that away.

Regards, Katherine Grocott

Kathryn Anderson

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

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Kathryn Anderson

[REDACTED]
[REDACTED]

Katreena Wiszniewski

I am someone who regularly uses and enjoys the green spaces in Adelaide and its surrounds.

I am against further rezoning and development of these green areas. Adelaide city is beautiful precisely because of its green parkland areas.

Pleae do not destroy this beauty by developing these areas for business or other interests. I believe this would go against general public wishes so I am sending in this feedback

The city and surrounding area was designed to have these green spaces. Let's keep them how they are to preserve the history and beauty of Adelaide and it's surrounding parkland.

Regards

[REDACTED]

[REDACTED]

Kay Anderton

Good morning

It seems members of the South Australian government are completely oblivious to the devastating impact climate change is having on not only our country but the whole planet and additionally how damaging rezoning parklands is to the habitat of various species of bird life that live and breed near the riverbank!

With the planned rezoning of parklands for commercial development I'm absolutely appalled by the ignorance and greed of those representing our state government and developers. At a time when we should be preserving green space to prevent further impact of climate change, our ignorant state government and developers decide they want to destroy even more green space? If the reckless destruction of green space continues, there will be a further irreversible increase in climate change.

Trees help maintain a cooler temperature so it is totally incomprehensible why the South Australian government would even consider further destruction of green space in our state when it is a time for planting more trees, not removing them!

For hundreds of years residents in our country have been able to seek refuge from the damaging heat and rays from the sun by sheltering under trees so with more and more trees thoughtlessly being removed, where will residents be able to seek shelter? Where will children be able to play? Where will families be able to gather for recreational activities outdoors? Also, parklands are a vital area where residents can escape to for exercising and unwinding from the stresses of every day living, in a quiet and peaceful environment away from the pollution and noise of the CBD!

Additionally, hasn't enough natural habitat for our birdlife and wildlife been destroyed by humans?! I'm losing all faith in humanity because there are so many who don't give a damn about other species that live on this planet, albeit constantly threatened by human stupidity and greed. What will happen to the lovely bird life that live in that area??!! When will it end? How many more species will die on this planet before humans wake up and realise that humans are not "entitled" to leave a path of destruction everywhere they go!

I want to add that Adelaide is known nationwide for our lovely parklands and many enjoy watching the wonderful birdlife we have near the Torrens. Who will want to come to Adelaide if all they see is CONCRETE structures with NO BIRDLIFE.

Even this morning on ABC News I saw the NSW Premier stating how important preserving flora is to NSW!

If the government proceeds with the planned rezoning and continues to encroach on what little parkland areas we have remaining, voting time won't come around fast enough because ENOUGH IS ENOUGH!

Regards, Kay

Kay Hannaford

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: kay

Family name: hannaford

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: NO, we do NOT want a stadium or high rise apartment towers or any other buildings on our precious parklands. I am appalled at the awfulising of our beautiful small city with brutal, taller than necessary buildings in heritage precincts so valued by South Australians and visitors alike. PLEASE preserve our green spaces and the river bank. We are not Melbourne. We must retain our unique character if we are to retain our prized lifestyles and attraction to visitors. Our human scale and beautiful open spaces are what makes Adelaide unique.

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proponent email: plansasubmissions@sa.gov.au

Keith John Rennie

The re-zoning of the riverside parkland - Helen Mayo Park, will allow further erosion into the parkland of development, contrary to the original planned layout of parkland surrounding the city, thus further destroying the unique character of Adelaide.

Apparently it has been argued that the area contains trees reaching the end of their life. It is important to combat climate change to retain existing and plant more trees to replace those that are dying, NOT to replace them with concrete and structure.

Further we question the need for a stadium. There is an underused Entertainment Centre, suitably located, with a capacity of 11,300, which, with modification, could no doubt be increased to cater for 15,000 as per the proposed stadium. Other proposed uses should be located on brown field sites, not on valuable parkland. Funds earmarked for the stadium would be better spent on resolving the hospital ramping, a brownfield site for the WCH and on the Arts. These would provide greater support for the Premier's re-election.

WE STRONGLY OBJECT TO THE PROPOSED RE-ZONING Keith and Brigitte Rennie

Kerry Hallett

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Kerry

Family name: Hallett

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I support the development of a new W&CH to the west of the newRAH. I strongly oppose changes that would: 1) allow a sports arena or stadium to be built on the parklands or 2) shift ownership of public parkland space to private ownership and 3) provide for parkland to be used for private residential purposes including land previously annexed for a public benefit ie old RAH site.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Kerry Reed

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Kerry

Family name: Reed

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This rezoning should not proceed. The parklands are public land and include many sacred Kurna places. They provide critical freely available open space for recreation and relaxation. They provide habitat and biodiversity, as well as opportunity for people to connect with nature. Even if trees are replaced, they will take an incredibly long time to grow to the same size. Looking at the results of the quick poll you have put up, these proposals clearly do not reflect the views of most people. I do not believe that adequate engagement has been undertaken with Kurna people, nor with the general public. Operating at the consult and inform levels on an issue as significant as this demonstrates a very old-fashioned and inauthentic approach to engagement. It is out of step with contemporary expectations on how the public shapes the decisions that affect them and shows a complete disregard for any true consideration of their opinions and values. If this rezoning is approved, it is unlikely to ever be undone. We cannot afford to lose more of our parklands to development.

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proponent plansasubmissions@sa.gov.au
email:

Kerry Thorn

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kerry Watson

Dear SA Government

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Best Regards,
Kerry Watson

Kevin O'Leary

Please find attached my submission on the above code amendment .

Could you please forward acknowledgement that you have received my submission

Regards

Kevin O'Leary

Submission to the State Government on the Riverbank Precinct Code amendment

Attention Code Amendment Team - Planning and Land Services Division

Introduction

The areas of the park lands proposed to be rezoned are some of the most attractive parts of the park lands because they mainly comprise a natural riverine environment. Being the driest state in the driest country in the world we should be celebrating the fact that this environment has been left in a semi natural state and not covered with buildings and developments that will only compromise its original form and function.

The public consultation process on the rezoning

Once again in Adelaide we are witnessing a very poor public consultation process on the use and development of a key area in the city. The consultation process that has been applied completely undermines the government's environmental and indigenous engagement credentials.

In stark contrast to other consultation processes carried out in other cities, for example on the redevelopment of the Manzanares River in Madrid Spain, where the public was invited to put forward ideas for the redevelopment of the riverine environment at a very early stage, in this instance the redevelopment of the Torrens riverine environment is presented, more or less, as a fait accompli with little or no evidence that other options have been considered let alone being fully analysed.

At the present time the areas of the park lands proposed to be rezoned are used by the public for a wide ranging number of outdoor and open space activities which could be increased exponentially if more thought was given to their current use. The proposed rezonings will limit the public's access to these areas.

The consultation processes with indigenous groups has been particularly poor with aboriginal leaders describing the rezoning process as 'insulting' and 'distressing'. A lot of the development proposed could be near or atop important aboriginal burial grounds.

There's now a common pattern of public consultation in SA being followed at a state level on major development projects and issues. Firstly, the public is never asked upfront for its ideas and suggestions before firm proposals are put in place. Secondly, information about a range of different options for action that have been investigated by the government is not disclosed it would appear because the details could be used to subvert its final decisions. Finally, meetings with aggrieved parties don't take place presumably because it's perceived that this will as only give purpose to the ideology and actions of these groups.

The environmental importance of the River Torrens as a riverine environment

Over the years various studies undertaken of the River Torrens ecology indicate that it has been seriously degraded with considerable loss of indigenous flora and fauna (both terrestrial and aquatic). A study undertaken by the EPA in 2011 revealed that the condition of the Torrens River in the adjoining Bonython Park aquatic ecosystem was 'poor'.

The authors of the *Green City: Sustainable homes sustainable cities*, point out the major benefits of creating environmental corridors in cities along rivers and streams:

- *Water in the landscape attracts people like no other feature*
- *Numerous landscape preference studies have certified water as being very important to landscape attractiveness*
- *The most important characteristics of a successful watercourse corridor are its width and its connectivity. Wider corridors and those with a greater degree of connectivity typically allow better functioning corridors*
- *Wider and densely vegetated watercourse corridors also provide protection from pollutants entering the water system because they act as filters for water draining from developed areas into the watercourse*

The current proposals for the River Torrens environment don't recognise these benefits:

- It's intended that a large proportion of the natural riverine environment be replaced by built environments
- The width of the natural watercourse corridor is being significantly reduced

Overseas experience in protecting and restoring riverine environments in urban areas

There are many other cities in the world, for example Madrid, Los Angeles, Mexico City and Berlin, where Adelaide could learn from more innovative ways of using open space and restoring the ecological balance of riverine environments. Adelaide is in the fortunate position where it doesn't have to remove freeways or built environments to do this. The restoration of the Manzanares River environment in Madrid Spain provides a particularly good illustration of what can be achieved:

- By the 1970's Madrid became one of Europe's largest developed cities and a multilane highway was built, encircling the city and destroying the its river banks
- In 2004, the city government decided to reverse this situation and developed a plan to reconnect the river to the urban centre by relocating the multilane freeway underground and reclaiming the natural landscape for green zones and gardens
- The Madrid Río Project (new recreational zone along the Manzanares River to relax and enjoy) and the Calle 30 Project (remodelling of the roadway and land) were developed concurrently in order to reclaim more than 2,961 hectares of land in Madrid, creating an **ecologic corridor** with a total surface area of 129 hectares.
- The purpose of the Madrid Río Project was to reclaim the river and its surrounding banks as public parks and green spaces for residents
- Both projects were designed with the intention to revitalize degraded and neglected parts of Madrid and to bring back the lost beauty of the city

Assessment of the government's current development proposals

1. Proposed new Women's and Children's Hospital

Although it's accepted that there are major advantages in collocating the Women's and Children's Hospital with the RAH, it has to be recognised that major incursions like this are completely undermining the whole integrity of Colonel Light's original concept of a planned city in a park. Certainly this incursion and all of the other proposed incursions are jeopardising the chances of the parklands ever being placed on the World Heritage list.

To make it onto this list, according to the official UNESCO [website](#), the natural or cultural site must have "*outstanding universal value*" and "*be protected for future generations to appreciate and enjoy.*" With so many encroachments being planned now and in the future, no assurance can be given that they will be protected for future generations.

Quite ironically, even our own Department of Environment and Water has listed out the major advantages of obtaining World Heritage listings:

- attraction of economic development
- increased tourism opportunities and visitation
- increased employment opportunities and income
- the attraction of major investments
- enhanced protection of the rich cultural landscape and cultural sites

It's extremely disappointing that the potential economic loss to the state in not obtaining a World Heritage listing for the parklands was not assessed by the government before it put forward proposals for major encroachments into large segments of them.

2. Proposed Riverbank arena

There appears to be three major problems associated with this proposal: it represents a major incursion into the Adelaide parklands, it conflicts with best practice guidelines for establishing wide ecological corridors along riverine environments and it will be a stand-alone facility when there is purported to be major advantages in locating arenas in mixed land use formats.

○ Major incursion issue

The arena development is such a massive encroachment into the Adelaide Parklands that this development proposal by itself puts at major risk the chance of them ever obtaining world heritage status.

○ The ecological corridor issue

As previously mentioned, wide riverine reserves retained in a natural state provide better functioning ecological corridors. Ecological corridors on land, are a critical conservation designation needed to ensure that ecosystem functioning and ecological processes are maintained or restored. The proposed arena comes right down to the banks of the River Torrens occupying an area that would be critical in re-establishing an effective ecological corridor.

○ The stand-alone facility issue

There are major advantages in not developing arenas like the one proposed as stand-alone facilities, but as mixed use developments comprising apartments offices, shops bars, restaurants and public plazas etc . This has certainly been the case with San Francisco's Chase Centre. According to the developer of this facility: *"The entire development becomes a part of the fabric of the city and a draw even on non-event days."* The relatively disconnected position of the proposed Riverbank Arena, cut-off as it would be from the central city by the RAH buildings, makes it rather difficult to link to the fabric of the city and in this sense is considered to be a poor location for this type of development.

3. Proposed multi storey car park for the Women's and Children's Hospital

There are a number of other locations available for developing a multi storey car park to service the Women's and Children's Hospital rather than siting this facility on the Adelaide Parklands:

- The car park could be developed in the undercroft/basement area of the new hospital

Alternatively, it could be developed over the existing railway lines. Developer and Grocon chief, Daniel Grollo , claims that Media House that was built adjacent to Southern Cross Station in Melbourne proved that large projects could be built over railway tracks without disruption to commuters. He also points out that the cost of creating decks over rail lines to build on - as was done for Media House - was *"no more expensive than buying land"*. (Sydney Morning Herald, Oct 2009, *Media House opens, reviving interest in building over rail lines*)

- Office, retail and apartment blocks have been built over railway lines in London, New York and San Francisco using bridge technology

4. Proposed high-rise buildings, shops , offices , light industry , consulting rooms, licensed premises etc. to be sited in various locations in the parklands

These uses are inappropriate in the parklands and not only will they jeopardise the listing of the Adelaide Parklands on the World Heritage list, but are likely to undermine the commercial, retail and service functions of the city centre.

CONCLUSIONS

1. The current proposal for a range of major developments in the Adelaide Parklands places at great risk their chance of ever obtaining a world heritage listing
2. The government needs to commission immediately a study to find out what the overall economic cost to the state will be if the parklands don't obtain this listing
3. No further action should be taken on the Riverbank Precinct Code Amendment until such time as the government has received advice from UNESCO as to how the

proposed incursions into the parklands will be likely to affect their potential listing as a world heritage site

4. It's clear that the current rezoning proposal will further degrade the River Torrens riverine environment which is at odds with current best practices for developing sustainable cities
5. To improve the state of the River Torrens riverine environment and to create a viable ecological corridor along the river it's imperative that as wide as possible natural corridor be retained
6. The government needs to seriously consider the very innovative riverine redevelopments that have been undertaken in other cities where the natural environment has been restored and enhanced for public use
7. Consideration should be given to finding a new location for the city arena given that the proposed development would jeopardise the chances of the Adelaide Parklands being listed on the World Heritage list, conflict with best practice guidelines for establishing wide ecological corridors along riverine environments and be a stand-alone facility when there's purported to be major advantages in locating arenas in mixed land use formats.
8. To establish a more credible public consultation process the general public needs to be provided with information on why other potential sites for a general purpose arena have been eliminated. The plan amendment process should be placed on hold until a more meaningful consultation process has been completed
9. Parking areas for the Women's and Children's Hospital should be established over existing railway lines or in the undercroft or basement areas of the hospital instead of being located in the parklands.
10. Proposals for the development of apartment buildings, offices, light industry, retail, licensed premises and consulting rooms in the parklands should be abandoned because they will not only be a major incursion in the parklands that will jeopardise their World Heritage listing, but be likely to undermine the retail, service and accommodation facilities in the central city business area

Kevin O'Leary



Kim Becker

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: kim

Family name: becker

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: This is one of the most beautiful and central spots in the city please please please do not do this

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sent to proponent email: plansasubmissions@sa.gov.au

Submission two:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: kim

Family name: becker

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: This is one of the most beautiful and central spots in the city please please please do not do this

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sent to proponent email: plansasubmissions@sa.gov.au

Kim Woods

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours sincerely

Kim Woods

5031

Kirin Moat

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Kirin

Family name: Moat

Organisation: member of the public, city worker

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am against the amendments. I do not think it is necessary for there to be more "icecreams and coffee" available along the Riverbank. I object to the commercialisation and increased built development of this precinct - otherwise called "activation". Seriously? The Parklands and the Riverbank precinct are precious, green, open spaces enjoyed and used by many. Its the unique and appealing aspect about Adelaide. Screw it up and there really will be no reason to visit our little city. You should be putting in stronger protections to enhance this beautiful space not allowing it to be built over - even with little platforms and kiosks and paths and rubbish bins and extra lighting and advertising boards - to make a short-term buck. And the hospital carpark? Really? Can't possibly think of any other solutions than the simple land grab? Can't understand any of the alternatives proposed by the Adelaide City Council or the Adelaide Parklands Association? I will be advising my local Liberal MP that this amendment is short-sighted, unimaginative, boring, stupid, and commercially-driven spin. Yawn!

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sent to proponent email: plansasubmissions@sa.gov.au

Kirstie Murch

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Kirstie

Family name: Murch

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: Leave our history alone! Enough has been destroyed as it is. It's great to be able to take our kids/grandkids to these places and show them where SA started. But if you keep allowing developers to destroy history we are going to have nothing left. LEAVE IT ALONE!!!!

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sent to
proponent plansasubmissions@sa.gov.au
email:

Kurt Florimond

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kylie Hood

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Kylie

Family name: Hood

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am not anti-development, however I object to any further development that encroaches on our unique and precious parklands. As a resident of the city and a healthcare worker at the RAH, I regularly use the parklands for leisure and to maintain mental health. The parklands are currently there for all to enjoy, and any further development runs the risk of removing access to those that can't pay to enjoy them. In our times of climate crisis, where we are supposed to be focusing on re-greening and cooling the local CBD climate, further development of the parklands would be a major step in the wrong direction. Keep the parklands free for all to use, and available for pop up festivals and activities as they have been for all these years. Reading over the guestbook comments, the overwhelming majority of residences are very opposed to the rezoning and development of the parklands, so who is it that is benefiting from this?

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sent to
proponent plansasubmissions@sa.gov.au
email:

Kym Angerson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Kym

Family name: Angerson

Organisation: -

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I live next to the parklands and strongly agree with the sentiments regarding retaining the parklands as they are, if not creating more. As others have said "To build on the Adelaide parklands is extremely disrespectful to The Kurna people as they are the traditional custodians of the Adelaide Plains on which Adelaide is located. To avoid further damaging consequences of climate change and global warming government should not be removing trees as they should be planting more!" "Tree planting is one of the simplest and most effective ways of tackling climate change caused by greenhouse gas. As trees grow they absorb carbon dioxide (CO2), a major greenhouse gas in the atmosphere. So, with the planned development on the riverbank and removal of 200+ trees, this means more CO2 in the atmosphere." and most importantly less Oxygen which is vital to all of us!! Adelaide is renown for it fabulous parklands to destroy them is narrow minded and greedy. We will end up having less and less as developers try to take over more land every few years. Your government is likely to create a 'public space' and then sell it off! Please STOP and let the families and tourists enjoy and be amazed by our beautiful city surrounded by parklands. Due to ongoing efforts to monetise and commercialise more and more of our world heritage worthy Adelaide Parklands, I oppose any changes to any legislation which enables building of any kind (apart from replacing old limited recreation facilities) on any of the remaining Parklands areas. Understanding there is constant pressure from commercial forces to stop more tree cover from being achieved (Victoria park) or to actually remove old established trees from our Parkland (Adelaide Oval area), DON'T give in to it. Money is not going to buy you an environment you can live in if there are no trees or greenery. This constant eating away at our precious Parklands has got to be stopped. Grow more trees and more parks also. Please.

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sent to
proponent email: plansasubmissions@sa.gov.au

Lachlan Haig

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Community Group

Given name: Lachlan

Family name: Haig

Organisation: Flinders Street Housing Co-operative Inc.

Email address [REDACTED]

Phone number: [REDACTED]

Comments: To Whom It May Concern, In response to the proposed changes to the zoning of different public park lands, we are in opposition to the proposed changes with the exception of the Womens and Children's Hospital development. We are members of a Housing Co-operative in the Adelaide CBD who have been residents in the the CBD for over 20 years and have seen a number of changes over those years. In particular the redevelopment of numerous sites to accommodate more inner city living areas for residents, which has been a welcome change. This residential change and increase of overseas students has also seen a much greater need for open green spaces for inner city residents to enjoy, play sport, and exercise. This has especially been evident during the recent lockdowns during Covid, where we particularly noticed an even greater increase in parkland use during lockdown, with family's needing to enjoy an open, clean, safe, and green space to break the monotony of lockdown. Also there is no reason why the parklands cannot be activated for cultural and sporting events, like it already is, with temporary pop up venues. We sincerely hope that the future will be kept firmly in mind when making these sort of decisions, as the decisions of today effect the generations of tomorrow. Lets not be the generation that destroys the unique 'green belt' for a quick gain today. In closing let's also remember we have a global responsibility to keep open green spaces and repopulate the land with more trees rather than more buildings and pollution, we owe that to the generations of tomorrow too. Yours sincerely, Lachlan Haig

Attachment: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Laraine Ruthborn

"I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Laraine Ruthborn

Payneham South SA 5070

--

Laura

I reject the Government's so-called "vision" for the Adelaide Park Lands.

Open Green Public Spaces do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage.

Please reconsider this rezoning and instead preserve our unique and priceless open green public spaces.

Kind regards,
Laura

Laura Oneil

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Laura

Family name: ONeil

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: There is no mention of replanting any of the existing trees and open green spaces in any of the proposals. Given the benefit of trees to environment and Adelaides intent to become a green city I would expect to see consideration of retaining mature trees and the design of new areas around them and other vegetation. NRAH was built with this concept in mind given the old gums on its location that pre date. Consideration to mandate use of materials that reduce urban heat would be good to see. Co location of new WCH will bring significantly more vehicle traffic and congestion to a distinct area and the arterial roads leading to (already busy.)

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sent to
proponent plansasubmissions@sa.gov.au
email:

Laura Pieraccini (Residents for Environment and Character Conservation)

SUBMISSION ON RIVERBANK RE-ZONING

By

Laura Pieraccini

Residents for Environment and Character Conservation

Adelaide has been known overseas as a 'garden city' and as the 'only city built inside a garden' but this paradise-like environment has been eroded systematically by government policies and greed.

While the idea of building the new Children's Hospital near the already inadequate Royal Adelaide may have some merit, the further erosion of the west Parkland must not be allowed under any circumstances.

Our city character and liveability is being relentlessly attacked by the Government with ever more cement replacing our green spaces.

With the Government kow-towing to the development industry, funded by tax-haven money, our private gardens have been condemned to death and so has the character of this once very beautiful city.

The new Development Plan which emphasizes in-fill development, and grants permission against local Councils advices, has overseen the demolition of hundreds of our unique Victorian and Federation houses as well as our stone bungalows.

These heritage buildings, which are the essence of Adelaide and what overseas and interstate visitors come to see together with our beautiful Park Lands, are demolished daily to be replaced by three and sometime just one modernist building that will not last as long.

Just last week an elegant stone bungalow in Parkside, in excellent condition and which could be easily renovated and extended, was advertised as the "ultimate blank canvas" inviting the buyers to demolish and rebuild.

This is outrageous and we ask that our green spaces gardens and trees be protected by law.

In a climate-change environment the destruction of our green spaces, which reduce heat and pollution, is simply CRIMINAL!

Please listen to reason not corrupt money.

Laura Pieraccini

Coordinator

[REDACTED]

[REDACTED]

[REDACTED]

Laura Watson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Laura

Family name: Watson

Organisation:

Email address [REDACTED]

Phone number [REDACTED]

Comments: I do not support rezoning, the parklands were created as a haven for residents and the open public/green space is priceless. I'm extremely disappointed with the erosion of the public space which has been happening over the last several years. It's a cheap land grab by the government.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Lauren Buchanan

To whom it may concern,

I wholeheartedly reject the re-zoning of any part of the Adelaide Park Lands. We need MORE green spaces and old growth trees, not less!!!

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Thank you.

Regards,
Lauren Buchanan

Lazaras Panayiotou

To Whom It May Concern:

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned, then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health, and so on would allow multiple developments over coming years to gradually replace Open Green Public spaces with developments in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found across no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant land.

Many areas of the Park Lands have been lost to development over recent decades. This latest wave of re-zoning would have the effect of diminishing the Open Green Public areas of Park Lands much further — accelerating the loss of this priceless resource.

Thank you for your consideration,

Lazaras Panayiotou

Oakden 5086

Leah Kermode

Hi team

I realise it is past the deadline but I accidentally sent the below to the wrong email address. If there's a chance it could still be considered that would be fantastic.

Thank you

Leah

Begin forwarded message:

From: Leah Kermode [REDACTED]
Date: 27 October 2021 at 5:05:14 pm ACDT
To: planningsasubmissions@sa.gov.au
Cc: premier@sa.gov.au, "DIT:Duty Planner" <DIT.DutyPlanner@sa.gov.au>
Subject: Submission - riverbank precinct code amendment

Dear Planning

My family and I wholly reject the re-zoning of any part of the Adelaide Park Lands. I am actually aghast this is even on the table. The parklands are protected from development so what is being proposed is a massive deviation from their current protections.

If any part of the parklands are re-zoned for any other purposes then they will cease to be parks – open spaces to wildlife and the public, with vegetation and light and calm. It is what makes Adelaide distinct. Re-zoning for the proposed purposes of entertainment, “innovation” or even for health purposes, is a way the governments open the door further to allow multiple developments over the forthcoming years to gradually replace open green public spaces in each one of the four targeted zones. There is enough grey area in the amendment to also allow for other development so really there is no certainty the development will stop with what has been suggested. Apartments? shops? hotels? This is a disgrace to the broader and deeper intentions of what is essentially a land grab.

Currently there are over 200 trees in the area proposed for rezoning. Cutting down these trees for development on public land is contrary to all the green agendas State Government are trying to achieve – especially when a section is proposed to be a banal car park, of all things. I frequently walk through this area and it is beautiful. There is an opportunity to claim back the yard and river sludge in Helen Mayo and re-green it – that should have happened already.

Use other sites to develop. Do not erode our parklands. Leave what's left of our heritage alone. Our parklands are priceless.

Please respond.

Yours faithfully

Leah Kermode

Leanne Prior

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Leanne Turnley

Dear all, please do not remove the beauty that is Adelaide.

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource".

Many thank

Leanne Turnley

Lee Lee

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Lee

Family name: Lee

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: This is ludicrous. Once it's gone, it's gone forever. Plus, we've already given away too much public land to developers for their private profits and greasy hand shake deals. Our Adelaide Parklands are for the people. Both tiers of Government are just the custodians and I think it's a pretty broad brush to be giving our public land away. Colonel William Light would be turning in his grave. Obviously I do not support this land grab.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Leslie Howard

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Leslie

Family name: Howard

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: The parklands need to be left unscathed by all current and future government and commercial ambitions which involve buildings of any kind other than public toilets, and the latter kept at small scale and maintained properly.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Lewis Owens

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Lewis

Family name: Owens

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

I wish to comment on the proposed Amendments to the Zones and sub-zones surrounding the River Torrens and the adjacent Adelaide Parklands. In general, I oppose all the proposed amendments as a complete rejection of the foundation principle behind the creation and design of the Adelaide townscape as envisaged by Light, and a misconception of the role of the River Torrens in the operation of Adelaide as a city. It is not a repetition of the (failed) Southbank exercise in Melbourne: the Torrens has been and should continue to be a casual, informal space to enjoy the River and water in the centre of the city, not a conglomerated, commercial capture of the natural environment. Torrens has always been a fragile environment, and these Amendments will place it and the city in a seriously compromised position. It is hard in 2000 characters to justify these comments, but in brief: 1. the rezoning of area west of new RAH to City R/b could be supported if the car park was located under the Hospital or on the western side of Port Road at the Brewery site: cost should not be the reason for stealing Parkland and heritage sites (proposal to re-use Gaol and Police areas as accomodation is demonstrably impossible and will remove the heritage significance). I do not believe the Heritage Overlay would protect this. 2. the proposal to create a new RiverBank west of Montefiore, and especially on the northern side between Kintore and Torrens Weir, is a complete ambit claim for development which is unjustified, unsubstantiated and unrealistic, with the potential for major destruction of the River environment. The Heritage and River overlay protections would be ignored and ineffective. 3. The change of Policy in the new City Riverbank Zone to accomodate sport, Health to allow the Heritage reuse, and Entertainment to incorporate Health/Education/ Research etc are all consequential changes flowing from the above unjustified and irresponsible proposals: my 2000 limit prevents more substa

sent to
proponent email: plansasubmissions@sa.gov.au

Liam Hanna

Chief Executive, Attorney General's Dept

Please find attached my submission on the above topic.

With thanks

Liam Hanna

[REDACTED]

Glenelg SA

SUBMISSION ON ADELAIDE'S 'RIVERBANK PRECINCT'

(aka Adelaide Park Lands)

Submitted by Liam Hanna

Citizen of Adelaide & Planet Earth

Think global act local

[REDACTED]
Glenelg SA

At the outset I wish to reference and endorse the ICOMOS submission, which in excellent detail presents the necessary historical, heritage, environmental, town planning/design and ownership context for this contested issue affecting the future of the City of Adelaide.

My approach in this submission is to analyse what I, and many others, see as a concerted attack on the integrity and very existence of the Adelaide Park Lands (APL). I contend that this attack is being conducted and coordinated by the government of the day and associated parties. This coordination or "collusion" is being screened from the people of South Australia with the intent of breaking up, by stealth, the integrity of APL. This incremental or "nibbling away" at the Park Lands is designed to escape the notice of the populace who, by and large set great store on the iconic legacy bequeathed to our City by Col William Light's vision of a City in a Park.

This Vision, a 184 year legacy is held in high esteem by the people of SA, who are the rightful owners of the Adelaide Park Lands. Through 184 years this legacy has been held in Trust by successive governments of the day – the present Government role in this present attack is more that of a real estate agent and the appearance of inappropriate relationships with vested interests is a cause for concern.

The Adelaide Park Lands are protected by legislation found in the Adelaide Park Lands Act 2005. Almost every aspect of this current attack is in violation of this legislation set up " ...to

provide for the protection of those park lands and for their management as a world-class asset to be preserved as an urban park for the benefit of present and future generations.”

Further, within this Act are **statutory principles**, up front to ensure that there is no ambiguity in the intent of the Act:

4—Statutory principles *(since they are so widely ignored I must cite in full)*

(1) The following principles are relevant to the operation of this Act:

(a) the land comprising the Adelaide Park Lands should, as far as is reasonably appropriate, correspond to the general intentions of Colonel William Light in establishing the first Plan of Adelaide in 1837;

(b) the Adelaide Park Lands should be held for the public benefit of the people of South Australia, and should be generally available to them for their use and enjoyment (recognising that certain uses of the Park Lands may restrict or prevent access to particular parts of the Park Lands);

(c) the Adelaide Park Lands reflect and support a diverse range of environmental, cultural, recreational and social values and activities that should be protected and enhanced;

(d) the Adelaide Park Lands provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City in a manner that should be recognised and enhanced;

(e) the contribution that the Adelaide Park Lands make to the natural heritage of the Adelaide Plains should be recognised, and consideration given to the extent to which initiatives involving the Park Lands can improve the biodiversity and sustainability of the Adelaide Plains;

(f) the State Government, State agencies and authorities, and the Adelaide City Council, should actively seek to co-operate and collaborate with each other in order to protect and enhance the Adelaide Park Lands;

(g) the interests of the South Australian community in ensuring the preservation of the Adelaide Park Lands are to be recognised, and activities that may affect the Park Lands should be consistent with maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

I contend that the present zoning proposals and the Government’s supposed custodianship of the Adelaide Park Lands are in breach of this legislation.

I illustrate my contention that the current attack on the Adelaide Park Lands is part of a planned strategy of “creep” appropriation of increasing areas of the Park Lands: introduce a small measure that will not cause too much anxiety and be “justifiable” e.g. Riverbank Precinct, then once “toe is in door”, launch wholesale implementation and exploitation of the Adelaide Park Lands.

Adelaide Oval and Stadium Management Authority – a case study

Yes, Adelaide Oval was always an icon of the Adelaide Park Lands. Sell the idea to the public that of course we need an AFL “stadium”, easy so far. Then, of course, we need a powerful organisation to run our beloved Adelaide Oval, so we set up the Stadium Management Authority, giving it great power, independence and authority, with lease options on all the Park Lands bounded by War Memorial Drive, Pennington Terrace and Montefiore

Hill – the Adelaide Oval Hotel was only the “first step” of SMA in utilising the siteto which SMA now claims “entitlement”. SMA now acts as a broker for further development e.g. second stadium.

Entitlement – a case study

Many vested interests now clamour for their “entitlement” to be satisfied: schools given privilege of using Park Lands for sports activity (a fair community use of Park Lands) now insist that they are entitled to build change-rooms – with attached amenities including exclusive restaurants; SACA of course needs a dedicated cricket ground (nicely fenced off so the community does not get too comfortable with the concept of “community access”; Adelaide Golf course is now slated to become a private, and no doubt very exclusive, golf club; a newly off- the-lease proprietor of a baseball commercial franchise strides onto the Park Lands to claim “entitlement” to any one of five sites for a new stadium (wouldn’t have been coached to make this claim before club was sold on by a football franchisejust now and again there is a sniff in the air?); casino and convention centres expand with apparent easebut I hear you protest this is not Park Lands this is Riverbank Precinct – aye there’s the rub: change the language, change reality; Walker Tower becomes two towers (technically not Park Lands but the presence changes perception); the River Torrens needs to be “enlivened”, it’s ‘boring’, so talk of bars and restaurants is the new agenda and the Property Council is emboldened to talk of cinemas and factory outlet stores. Not to mention their suggestion of tearing a strip off the Park Lands on north side of Greenhill Roadideal site for another string of steel and concrete towers! You would not find a civic leader who would even dream of establishing a highly commercial sport club on any of the great Parks of Europe: try to imagine the Niks on Central Park or Arsenal on Hyde Parkthe market place will deliver great shopping centres; search elsewhere for visionary greatnessand surely that’s what we’re talking about!

The only agency with any sense of entitlement to this visionary heritage bequeathed by Col Light is the people of SA – sectional interests should “bugger off” and build their palaces elsewhere.

Riverbank Precinct – a case study

The omni-present Riverbank Precinct was introduced as a “concept” to contain the facilities adjacent to Elder Park; it seems it now embraces both banks of the Torrens all the way to Bonython Park. And now we have multiple agencies launching attacks on the Park Lands, taking the heat off the government and creating the impression that “everyone thinks this is a great idea”. There is even correspondence from the Premier advising that future complaints should be directed to the Convention and Events Corporation – so much for the government being the protector of the Park Lands; one day we’ll ask “when did the development agencies assume “responsibility” for the Adelaide Park Landsmark the date of that correspondence.

So if the Adelaide Park Lands have been held by the government of the day in Trust, for 184 years, and if that Trust has now been breached where to from here? Perhaps the subordinate agencies, Adelaide City Council and Park Planning Authority, can find the community support to take a stand. Perhaps some of our media can get off the pro-development band wagon and help educate the SA community as to how their environmental heritage is being sold off. Perhaps the Courts may have to intervene to investigate (illegal?) breaches of a sound interpretation of the Adelaide Park Lands Act 2005. Or perhaps our various parties who present to form Governments could genuinely cooperate to develop a manifesto on a visionary delivery of Light's Vision – a forty year plan with 10 year segments to develop genuine community facilities: tracks and pathways, formal gardens and woodlands, courts/ovals and recreation facilities, an expanded waterway (cf. Canberra/Lake Burley Griffin), even underground parking! The market can look after itself; to deliver on Great Vision we must have women and men to nurture and protect that Vision. In 100 years time Col Light may look down from Montefiore Hill on a Vision Splendid or he may lament "look on my works ye mighty and despair".

Post-script Ditch the total zoning plan package (most of it is most probably illegal), set up a balanced think tank (Royal Commission not requiredyet!) to negotiate site requirements for Women & Children's Hospital – genuine needs not a catalyst for push-on developments. A couple of community minded lawyers should look at a case before the appropriate Court for breaches of the legislation just in case the political custodians cannot come to their senses. And let's see many cartoons of an unspecified Premier standing on a hose-pipe (impeding flow of water) while pontificating that the dry parched Park Land before him is only "dusty paddocks", "a dump site", a "run down olive grove" or the "waste of a good sheep station" (a beautiful Canberra surrounding Lake Burley Griffin was once so described). Extract the digit and give SA a beautiful, liveable City that is both prosperous and green.

Libby Ottaway

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Libby

Family name: Ottaway

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The Police Museum should stay where it is. It is a first class museum set up in a building that suits the purpose. The police horses should also stay where they are in stables and training yards suitable for the purpose. The historic olive grove should also stay where it is as was intended by Colonel Light. As more and more of the parklands is rezoned for building leave this alone.

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sent to
proponent email: plansasubmissions@sa.gov.au

Liesbeth Pockett

Dear Councillors and Planners,

I am horrified by the Riverbank Precinct Code Amendment that gives a clear light for development for these parklands. Our parklands are not cheap real estate. Our parklands are for the people of SA! Not to have this all commercialised.

We do not want shops etc along the river Torrens.! We do not want an Arena in the Helen Mayo Park . We already have a stadium that can be upgraded to an Arena in Hindmarsh! But I can see the money grab taking place here as the Government can, with these proposed amendments, just do what they like without scrutiny eg, build this proposed stadium and then sell the Hindmarsh stadium land for a great deal of money! Is that what development stands for!

Why should there be private apartments and shops in the community's parklands. The parklands were originally put in place for the use of the general community.

This constant nibbling away of the parklands needs to be stopped ASAP! Soon more accommodation will be build, just like the new one next to the railway station and around the Adelaide Oval! That was bad enough. Existing hotels in the city can be used for this, otherwise those ones will have problems in getting customers and thus will run down. They then might need to be sold for new developments. The same concerns are for all those restaurants, coffee shops etc planned along the river bank. They will take away the present business in Rundle Mall and Hindley Street. The new owners along these planned parklands developments will have huge advantages because the environment is so beautiful. Not good planning here! Letting the present city facilities been run down and transfer them all onto the riverbanks! Why not beautifying the city itself? Why not creating new facilities there and improving quality of life for the city people and businesses?

Existing tourism is well served in the city and now can wander the river banks to get away from the city into nature. This option is going to be destroyed by these plans. In future they will be attacked by commercial stalls etc along the river for their money! Who wants that! The tourism presently enjoys the quietness of nature so close to all facilities. That is what Adelaide stands for! Why destroy that?

Therefore NO NEW DEVELOPMENTS ALONG THE RIVER TORRENTS OR IN THE PARKLAND!

But I really wonder if the voice of the ordinary people in Adelaide will be heard as we do not have the money to bribe the government like big business has. It is really a sad situation here in Australia. quite honestly I believe I have Buckley's change that I can stop this land grab.

Your sincerely
Liesbeth Pockett.

Lisa Allison

Dear Planning SA,

Your plan to build all over the parkland is short-sighted and a huge land grab of parlance that belong to all of us.

Our parkland are what make our city so special. We do not need 20 storey high rise on our river bank, or on any ground spiritually significant to Aboriginal people.

We have enough highrise in the city- happy for you to build it there, or North Adelaide. But not our parkland.

Please leave them alone. It's going to determine my vote,

Regards,

Lisa Allison.

Lisa Laycock

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Lisa

Family name: Laycock

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Keep your grubby hands off our unique world class parklands. In an era of unprecedented climate change, you want to denude our parklands of trees and green open space and build concrete structures all over them which will increase the heat bank generated by the city. Colonel William Light would be turning in his grave. NO more hospitals, hotels, stadiums or car parks on the parklands. They belong inside the square city mile or in the suburbs. If the South Australian Government can ignore legislation like the Environmental Protection and Biodiversity Conservation Act and the Adelaide Parklands Act, what precedent is that setting for the general public? Can we ignore every other law that has been made in this country? Lead by example and adhere to existing state and federal legislation.

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sent to proponent email: plansasubmissions@sa.gov.au

Lisa Maeorg

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Lisa Schuyler

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Lisa

Family name: Schuyler

Organisation: Environmentalconservationnow.com.au

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I'm concerned at the lack of indigenous consultation as well as the loss of habitat for fauna and the environment. I'm concerned the hospital is not fit for purpose. More consultation with medical staff is urgently required.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Liz Harfull

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Liz

Family name: Harfull

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I am outraged about any type of development at all in our parklands, and particularly along the Torrens. The beautiful gardens and open spaces should remain exactly as they are. There have already been too many buildings put up in what was intended by Colonel Light to be open spaces - a very precious legacy which he left us all, and which make Adelaide unique. We DO NOT want to be another Melbourne or Sydney, where they had no choice, having lost the open spaces many decades before through lack of vision and planning. Please note: many of my friends are traditional Liberal voters. More than a few of them are disgusted at a series of decisions disregarding heritage, including the commercial tourism development in the KI national park, the changed planning laws, the Waite gatehouse debacle and Ayers House, and the contempt shown by the minister for decades of volunteer effort. Three of them are Liberal Party members of longstanding, who tell me they are planning to change their vote in the coming election because they've had enough. That is a HUGE thing for these people to say, and someone needs to pay attention.

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proponent email: plansasubmissions@sa.gov.au

Liz Traeger & Dennis Dale

"I reject the re-zoning of any part of the Adelaide Park Lands.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

We are STRONGLY opposed to the rezoning of any part of Adelaide's parklands.

Liz Traeger & Dennis Dale

Lois Watson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Lois

Family name: Watson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: There seems to be a constant 'nibbling away' at the Adelaide Park Lands, areas that once built upon will never be open space again. The new buildings at the western end of North Terrace, as part of the Health Precinct, have created a wind tunnel instead of the clear views across the River Torrens. The current plans for further buildings, entertainment areas, etc. are showing the views from the River Torrens up towards the city. For those trying to look for the River Torrens from a city viewpoint (if not from a RAH room or adjacent office) it will be just more buildings. Please keep our Park Lands as open space, keep the green views for everyone; don't keep building up and over these Park Lands, as once gone they are never regained.

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proponent plansasubmissions@sa.gov.au
email:

Lorraine Rogers

The riverbank precinct along the River Torrens, as it is in the Adelaide Parklands, must be kept solely as Parklands.

If this area needs to be 'cleaned up' then this is what has to happen. Clean it up and plant more Australian trees, bushes and grasses. Bring back the wildlife.

The Adelaide Parklands belong to all South Australians of today and of the future.

The Parklands are owned by the people, not any particular Government. To take this area for commercial purposes, is to steal from the people.

To take this area and use it for any other purpose other than use it as Parklands is THEFT.

Another word that can be used is VANDALISM.

I voice strong opinion against any proposal to change the zoning laws preserving our World Renowned Adelaide Parklands. This Greenbelt must be saved, restored and kept intact for all future generations.

Regards,

Lorraine Rogers

[REDACTED]

[REDACTED]

[REDACTED]

Meadows 5201

Lorraine Coomans

I reject the re-zoning of any part of the Adelaide Park Lands.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Lorraine Coomans

Louise Bywaters

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Louise

Family name: Bywaters

Organisation: private citizen

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I strongly object to any permanent structures being built in the riverbank zone, particularly commercial ones. This is a beautiful and flexible area and is under constant and changing use by families, organisations, cultural groups and other users. It is much loved as our city recreational area and is there as part of the green common around Adelaide. Too much has been given over to corporatised sport, mostly male dominated sports. Family spaces and areas that can be used in a flexible way without permanent bitumen and buildings is much needed. I am disgusted at the planned corporatisation of something that was meant to be for ordinary people to enjoy natural spaces in a variety of ways. There is no hope for the parklands while big business has its eyes on it. The new clay court tennis area on the river bank is an example of that. This is my local park, during covid it was a godsend. Dont build it out! Return it artfully to a natural landscape that can be enjoyed without spending a dollar.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Louise Drummond

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Louise Drummond

████████████████████

████████████████████ 5410

Louise Handley

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Louise

Family name: Handley

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I object to the proposed development along the riverbank.

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sent to proponent email: plansasubmissions@sa.gov.au

Louise Warin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Louise

Family name: Warin

Organisation: N/A

Email address [REDACTED]

Phone number: [REDACTED]

Comments: The Adelaide council needs to realise that the parklands in Adelaide, the historic olive groves, the old Adelaide Gail etc, are a huge asset. They need to be valued as they are our point of difference from other Australian cities. We do not need to be bold & brassy & in your face like Melbourne, Sydney or Brisbane. Our appeal is in the green environment & history of the areas. Don't erase the important details of our past. Once these jewels are gone, they can't be replaced. The overall area loses its appeal & uniqueness. We don't need any more cafes, oversized expensive sporting complexes , or hotels, just to satisfy some greedy developers. Already the cafes & hotels that still remain in the CBD are struggling. Why inflict more pain on them, by adding further competition? Regards, Louise Warin.

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sent to
proponent email: plansasubmissions@sa.gov.au

Lucy Hood

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Lucy

Family name: Hood

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

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sent to proponent email: plansasubmissions@sa.gov.au



Lucy Hood

Your Local Labor Candidate



Attention: Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

Via email: plansasubmissions@sa.gov.au

To whom it may concern,

I write on behalf of the community, as their neighbour and local Labor Candidate, to voice feedback regarding the **Riverbank Precinct Code Amendment**.

I have been contacted by numerous concerned locals, I have personally knocked on hundreds of doors, taken part in a community rally and attended information sessions in relation to this issue.

From these discussions, forums, meetings and rallies, it is overwhelmingly clear the local community opposes this broad and extensive Riverbank Precinct Code Amendment, which has been described as "the single biggest attack on ... Open Green Public Park Lands in their 184-year history".

Members of the community have highlighted to me their frustration that the State Government has not been able to provide adequate justification for this extensive rezoning proposal. They say they are disappointed and angry the State Government has not been able to justify why **Pinky Flat, Elder Park and the River Torrens itself need to be rezoned to pave the way for permanent structures such as nightclubs and bars, tourist shops and cafés on our historic community assets.**

Further, residents have also raised concerns in relation to height, whereby the proposed new 'zones' will enable commercial developments along the riverbank, whether that be shops, bars, residential or office buildings and carparks, of **up to 20 storeys high.**

Residents are overwhelmingly concerned the proposed new Riverbank 'Subzone' would also allow on-water infrastructure to be placed **on the River Torrens itself and overwhelmingly reject the need for a 15,000-seat basketball stadium to be built on Helen Mayo Park - particularly, during a hospital overcrowding and ramping crisis.**

*Together, we
can do better*

0451 689 400 | Lucy.Hood@alpsa.org.au
GPO Box 35, Adelaide SA 5001

lucyhood.com.au



The community has also questioned why the health sub-zone is proposed to move so far west? Many in my community would like the State Government to explain why the sub-zone's expansion is needed and what it plans for the historic olive groves and the old Adelaide Gaol?

While building a new hospital on the Park lands is one thing, allowing commercial developments like 20-storey office blocks, shops and cafes is another.

Just like New York's Central Park is famous for being a park in the middle of a city – Adelaide is renowned for being a city in the middle of a park with its "figure-eight" of Park Lands garlanding the CBD and North Adelaide.

This is something that should be celebrated and protected and act as a drawcard for visitors and tourists to our beautiful city.

Permanent structures on Pinky Flat, Helen Mayo and the river itself, threaten not only this unique attribute, but our case for our Park Lands to receive UNESCO World Heritage Listing.

At an economic level, small business owners in my community question why the State Government is focussed on creating another city business district on the riverbank, when the current CBD is struggling. Moving the nightlife and entertainment foot traffic away from the existing CBD, many fear, will have a detrimental economic impact on our CBD businesses, laneways and historic main streets.

But the Park Lands are more than just economics.

Pinky Flat, in particular, is a site of enormous cultural significance to the Kaurna people. Many share a strong emotional connection to our Park Lands. I have also listened to story after story of people who have cycled, ran or walked along Park Lands trails for decades.

I have listened to those who have shared their family traditions along the riverbank and the countless ways our community enjoy these open green spaces each and every day.

I too have my own story. My husband and I bought our first family home – an apartment – in Adelaide's CBD. We were able to raise our two children in the CBD because the Park Lands were their backyard.

If the Covid-19 pandemic has taught us anything – it's how important open, green space is – and why it must be retained to protect the liveability of our communities and the health and wellbeing of current and future generations.

In summary, our community believes Adelaide is voted one of the **world's most liveable cities – and the most liveable in Australia**, in large part, because of our Park Lands.

We achieved this title without a broad and extensive rezoning of our Park Lands.

On behalf of residents, thank you for considering the concerns of our local community.

Yours sincerely,



Lucy Hood
Local Labor Candidate for Adelaide

¹ <https://www.adelaide-parklands.asn.au/rezoning>

Lucy Macdonald

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Lucy

Family name: Macdonald

Organisation: Resident, ratepayer, voter, user of Parklands daily- Adelaide City Council area for 43 years

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: 1. I CANNOT support two proposed sub-zones on the map, viz a) The Riverbank Precinct, including all parks along both the Northern and Southern sides, including all existing open woodland parks lands, apart from existing rowing sheds. b) The Gaol Road precinct: preserve its historic olive groves and SA significant site. 2. Botanic High's 'subzone' is a fait accompli, occupied with a recent government project built without any consultation about use of Parklands. * Despite the building having architectural merit, unlike the dreary Convention Centres that lack any riverbank vitality, the decision to build Botanic High told the Public that any part of Adelaide's park lands already built on would remain as development land without Parkland protection. 3. Pinky Flat and the Northern side of Riverbank Precinct MUST BE LEFT OUT of the Rezoning Proposal. * Instead of rezoning Riverbank's north side for Gov't controlled activation/development, the Minister could focus on revitalising existing Entertainment Zone parks, Elder Park & Riverbank's south side between the Convention Centres and the river. These parks are dull, exposed & under-used. * Pinky Flat + entire north Riverbank MUST REMAIN IN THE ACC'S CONTROL. Why can't Gov't apply to Council like any other applicant? 4. The Hon Minister's proposals prove & illustrate this Government regards Adelaide's Parklands as free land to take over and use at it wishes. * The Parklands were NOT established as spare land for the Government's entitlement to fill with buildings. *Under this proposal the Parklands are NOT SAFE from Government development, but are vulnerable to the Gov't's disrespect. 5. Adelaide's Parklands are already diminished by significant encroachments for Government projects, which endanger our World Class asset. * This Gov't should be SUPPORTING Adelaide's application as a World Heritage Parkland City, with unique planned parks, instead of undermining their status.

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sent to proponent email: plansasubmissions@sa.gov.au

Luke Watson

Please for the love of god build that River Bank stadium, we are in dire need of it. If not we'll lose high profile events and we'll be left out of Australian tours for the future. Don't listen to the stupid Greens or the old people who oppose it. We really, absolutely, TRULY need it! Please start construction ASAP.

Lyn Gale

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Lyn Hawker

SIRS

To such a level of oversight as having anything build on the River is to set the end of the Green along the city way. If we use

the Oval or the Tennis Site we have to jockey with a high rise.

I think not.. Have you succumbed to a view of another city.

This is Adelaide.

High rises on North Terrace that are all empty are enough for any one. This looks exploitative

Leave the Torrens alone please

Lyn Hawker

Lynda Yates

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Lynda

Family name: Yates

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I was confused by the proposed amendment as a lot of the zoning changes seemed to be to make zones more appropriate to what is there already or has I imagine been recently added - but that is putting the cart before the horse - any changes should have complied with EXISTING zoning regulations. For instance, should the new Hospital be in the Parklands zone at all? The Government is gradually chipping away at the Parklands in order to add new buildings. This is wrong. The Parklands should remain sacrosanct and not have buildings added unless they comply with existing zone restrictions. Changing the zones now means a complete loss of protection against more development in the peoples' precious parklands. Many people do not want more activation of the riverbank area. They don't want to see yet more buildings but to just walk along a fairly natural looking area to see nature. We don't need yet more fast food places or restaurants with the likely increase in food wrappers and rubbish etc along the waterway. If we want that, we go into town. No doubt commercial interests would be happy to add hotels etc. to the area even apartments and they would pay higher rentas but we would lose the breathing space we currently have to slip into a cool green area and relax away from the bustle of the town. There are only many so many meals we can eat so more food places means less customers for the existing city venues. PLEASE DON'T ALTER THE ZONING AND KEEP OUR PARKLANDS AS THEY ARE NOW FOR FUTURE GENERATIONS TO ENJOY.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Lyndal Govey

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Lyndal

Family name: Govey

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: As a member of the public who enjoys using the green space of the Torrens Riverbank from Kintore Ave to the Torrens Weir I strongly object to changes to the zoning which would allow infrastructure, especially an arena, to be built on this parkland. Green space, varied habitat and recognition of cultural identity are more valuable than commercial and economic growth.

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proponent email: plansasubmissions@sa.gov.au

Lyndall Kay

Hi

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource. Kind regards

LyndallKay

Lynette Bacchus

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Please respect the green areas as the lungs of Adelaide.

Lynette Bacchus



Lynette Holmes

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Lynette

Family name: Holmes

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: The Old Adelaide Gaol, police barracks, parkland should not be destroyed. Many people/families enjoy using these areas, visiting these historic areas. Just because something can be done doesn't mean it should be done. We ARE NOT Melbourne or Sydney. We don't need any more high rise buildings. We need people to start protecting our history otherwise there will be nothing left of it. Stop destroying buildings and just leaving a facade. It is totally disgusting what this state is doing to our history.

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sent to proponent email: plansasubmissions@sa.gov.au

Maggie Fletcher

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Maggie

Family name: Fletcher

Organisation: not applicable

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: No No No. This is wrong from any way, anyone can look at it. I am tired of hearing about how 'we are taking the advise of health experts' etc. etc. when clearly the government is not. Do people mentally heal being inside another building or in open green spaces? Do buildings breath clean oxygen into our environment? Do buildings sequester carbon. No they do not. Quite the opposite. Shame on anyone who even suggests this- Now or any time in the future.

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Mandy Cannon

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Marcus Beresford

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: MARCUS

Family name: BERESFORD

Organisation:

Email address:

Phone number:

Comments:

I am strongly opposed to the bulk of the zoning amendments proposed to the Torrens riverbank. The only proposal with any merit is the proposal to create a new subzone along the riverbank for small scale cafe/shop development to activate the river area. In that instance this should only apply to the southern bank, not the northern, and it should be between King William Rd and Morphett St only. The rest of the proposals are completely contrary to the purposes of the parklands. The proposed women's hospital makes sense given the location of the new RAH. However the Gaol precinct should be preserved, and the Police precinct cleared for open space, with the possible exception of the art deco style dormitory building, which could be re-used for a public purpose such as homeless peoples' shelter.

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proponent email: plansasubmissions@sa.gov.au

Marcus Spronk

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Marcus

Family name: Spronk

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: I strongly object to the proposed changes. The Parklands should not be touched and left as open green spaces

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sent to proponent email: plansasubmissions@sa.gov.au

Maree Creevy

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

It's a sad time if this happens.

Maree Creevy

Marg Hill

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks.

Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments to gradually replace Open Green Public spaces in each one of the four targeted zones.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

There are many other vacant sites, not part of the heritage Parklands, in desperate need of development.

M J Hill

Medindie 5081

Marg Martin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Marg

Family name: Martin

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This proposal seems like the vital open spaces intrinsic to the Adelaide parkland area of the Torrens are being seriously undermined, by stealth and rhetoric. Bit by bit the area is being eroded, and it seems that all that will be left will be pedestrian and cycle paths linking commercial areas. It seems that our Torrens will become just like the awful and non inclusive river front in Melbourne which is full of commercial enterprises, with hardly any open spaces for the public to enjoy unless patronising cafes and restaurants.

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Margaret

No more parklands must be transferred by any means of Code Amendments. It's the 'thin edge of the wedge' as more and more ways are being found to reduce the area of our Adelaide parklands and replace more areas with heat-producing bricks and mortar.

Margaret

Margaret Allen

Dear Plan SA

I reject the re-zoning of any part of the Adelaide Park Lands except for the WCH I note how poorly served the inner west suburbs of Mile End and Thebarton are for parks and open space. The widening of Port road and Park terrace have already shaved significant amounts offwBonython Park. The old netball courts there seem to have become a permanent car park. SACA has taken over Gladys Elphick park and many cars are now permitted to park there. Circuses and other events are allowed to use Bonython park for weeks on end. These parks are the lungs of the inner west and it's people. Over almost 50 years our family regularly walks in Bonython park and along the river, a very rare stretch of open and uncluttered space and now you plan to gobble it up pave it and cut down wonderful old trees.

I note that Victoria Park in east has been returned to the public why are we in the west treated so poorly by comparison?

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

I also point out that the short time allowed for public consultation is a disgrace and a travesty of democracy. Shame on your government.

Sincerely

Margaret Allen

Professor Emerita Margaret Allen

Gender Studies and Social Analysis

Faculty of Arts

University of Adelaide

Adelaide

South Australia 5005


CRICOS Provider Number 00123M

Margaret Low

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Margaret

Family name: Low

Organisation:

Email address:

Phone number:

Comments: I am opposed to this development amendment. It destroys our beloved parklands in this area which constitutes 10 % of the total parkland area. The area is of historical significance and is not degraded as Premier Marshall states. It needs to be preserved as precious green space. Renovate the current WCH to high standard, it will be cheaper in the long run and cause less disruption to hospital services. We also do not need another stadium.

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Margaret Stratton

In late 2020 we moved from USA to Adelaide. After travelling extensively in USA and other countries, Adelaide impressed us as a beautiful city, endowed with incredible parklands around the city centre, the Torrens River greenway, plus hills and beautiful beaches. All enhanced by parks, gardens, street plantings, and many beautiful buildings. Wow!

Only a year later, it's apparent developers, including the government, have plans to erode away parkland on the north side of the city centre, and allow tall buildings close to the river.

With climate change at the forefront of news, Adelaide has the opportunity, and must continue to create and preserve as many trees and green spaces as possible to keep our air clean, our temperatures cool in summer, retain water, allow for birds and wildlife, and above all, cater for the population to have as much opportunity as possible to be outdoors within the city, keeping healthy and happy. The proliferation of high rise apartments, and townhouses covering land makes it even more imperative that open space be preserved. In my travel experience – cities with streets of high rise buildings close together are not at all pleasant to be in – shaded in winter, windy all the time, blazing hot in summer.

I plead with you, who have the power to keep Adelaide green, beautiful, liveable, and the envy of other cities, NOT to lose any further parkland to development. In particular this gem of land beside the Torrens, where people can relax, exercise, meet friends and family, and get away from tall buildings.

Margaret Stratton

Mile End SA 5031

Margaret Whelan

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Margaret

Family name: Whelan

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I wish to object to Adelaide Riverbank Precinct proposed Rezoning. The Adelaide Parklands are nationally heritage listed with a proposal to seek World Heritage listing which will not be granted should the rezoning be approved. (World Heritage Listing is certainly a plus for tourism in addition to climate management. Open greenspaces do not need rezoning. Once rezoned there will be no future public notification rights. Shops, bars, night clubs and offices on either side of Torrens between Hackney Rd and west of Morphett Street are unnecessary. Why waste huge money on a new stadium? Update the Entertainment Centre and put the money saved into Health. Public transport to this venue is already in place. In making such huge decisions, consider the legacy this government will leave for future generations, not the egos of the politicians. Is it possible to build the new Women's and Children's Hospital on the current site? Hospitals have been built successfully on existing sites. PLEASE DO NOT REZONE THE RIVERBANK PRECINT.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Margie Medlin

Attention: Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

Please reject the proposed The Riverbank Precinct Code Amendment.

--

Margie Medlin(E) [REDACTED]
<http://unsited.org>
[REDACTED]

Margot Ayres

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Margot

Family name: Ayres

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The Riverbank, along with the entire Adelaide Parklands, should remain as they were intended, ie, untouched open public parklands. Our parklands should not be built upon at all. There is already far too much encroachment on our parklands.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Marguerite Leggett

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Marguerite

Family name: Leggett

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: While I agree with development in principle Please ensure that that you consult the Kurna people about Pinky Flat.

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Maria Johns

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Maria Lease

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Maria

Family name: Lease

Organisation: CoA20

Email address:

Phone number:

Comments: The City of Adelaide is the world's only city within a park. The Park Lands are why Adelaide is one of the world's most liveable cities and the large green belt around the city is critical to help Adelaide be climate ready at to mitigate urban heat in the face of rising temperatures and less rainfall overall. The State Government managed parts of the Park Lands are becoming increasingly built up and inaccessible. No more development in the Park Lands, no more land grab, use existing land (preferably non-parklands) or existing building footprints!

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proponent email: plansasubmissions@sa.gov.au

Marian Wicks

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Marian

Family name: Wicks

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I am shocked and dismayed that anyone could destroy our cherished , world recognised Adelaide Parklands! Already you have built on large areas and now proposing to build on more. Shame on you! In this time of steadily increasing global temperatures the need for more green areas is increasing but you seem to not care for our planet, our only home, but wilfully bent on destroying it.

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proponent plansasubmissions@sa.gov.au
email:

Marina Duffie

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: marina

Family name: duffie

Organisation: education

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am very much opposed to the River bank Precinct code Amendment. This public open space "park" land belonging to and for the use of the people of Adelaide should remain as such. There is no place for commercial/business development to be giving access to this land, eroding the green spaces for which Adelaide is famous and which contributes enormously to the livability of the city. Once it has been developed there is not reclaiming it. There must be alternative solutions to be found to accommodate any essential public buildings such as hospital carparks and or government/private business partnerships such as sports stadiums without targeting the precious public resource that the parklands are. It is a short sighted, easy option that disregards the aesthetic and cultural value of the asset we have here in Adelaide.

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proponent plansasubmissions@sa.gov.au
email:

Marjon Martin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Marjon

Family name: Martin

Organisation: N/A

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I reject all of that which is being proposed. We have been fortunate that our city was designed to be inside a Park Land. We are potentially even more fortunate today with Climate Change impacts being felt ever more strongly. To destroy the benefits of the Park Lands by pouring more concrete, creating more buildings is not helpful to us. It is indicative of the government's lack of understanding of the times we live in. Your old thinking focusing on promising familiar jobs and even older thinking of let's distract them with games, amounts to criminal negligence. The Government needs to focus on what Climate Change effects are likely to be on the city and the whole State and work to the strengths of each area. Adelaide, the capital city, is surrounded by Park Lands; it has the most marvellous head start any city could have. Don't ruin it with your old world thinking.

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Mark Gishen

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Mark

Family name: Gishen

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: I oppose this amendment outright. I do not believe that there is sufficient objective evidence to demonstrate that the proposed changes will have benefits of any type (e.g. financial, social or environment) that would outweigh the costs and negative impacts.

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proponent plansasubmissions@sa.gov.au
email:

Mark Matthews

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Mark

Family name: Matthews

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This proposed plan is contrary to the original established and much lauded concept of the city ringed by Parklands. We have seen the piecemeal erosion of the vision established at the creation of the city. Use of the parkland for other development is a cheap cop-out to the more fundamental requirements of good urban planning and economic development. There is no opportunity cost ascribed to the parklands and no cost to the community or the city for any parklands taken for development. With a proposal that is broad in nature, this cannot be considered appropriately and should be rejected. Individual considerations should take into account a range of factors which have not been properly developed with this proposal. The misuse of parkland for storage and other unintended uses (such as Kate Cocks Park) is a blatant attempt to then say that the area is degraded and therefore should be developed. The return of the SA Water site to Gladys Elphick park is a perfect example of how renewal to original intent should be considered. Whilst there are a lot of documents here in this proposal, there is insufficient detail in so many areas, permitting a swathe of developments which are potentially inconsistent with the ideals of the parklands. It is embarrassing to suggest such a development on one hand, and on the other to seek accreditation as a National Park city. There are many other sound alternatives and considerations for the proposed developments, and the public should be consulted more widely in further consideration and development.

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proponent
email: plansasubmissions@sa.gov.au

Mark Parnell

Dear Planning Minister,

I strongly oppose these changes.

Because of their special significance, the Adelaide Park Lands have special rules that prevent the government from using sneaky methods to bulldoze developments through. Under the old Development Act, this included not being able to declare Major Projects and Crown Developments. These protections have been largely replicated in the new Planning Development and Infrastructure Act 2016.

One glaring loophole remains - the ability of the Government to change the zoning or planning policy via a Code amendment and thereby ensure that their favoured developments can be pushed through with no genuine public consultation and certainly no third party appeal rights.

The solution is simple: amend the Act to provide that changes to zoning or planning policy affecting the Park Lands do NOT come into effect until AFTER the process of Parliamentary scrutiny is completed. That process of Parliamentary Scrutiny also needs to be amended so that the "gate-keeper" - the Government-controlled Environment Resources and Development Committee - does not have exclusive rights of veto, but that either House of Parliament can independently move and vote on disallowance. That is how it works with disallowance of Regulations, so why not with planning policy affecting the unique Adelaide Park Lands?

Once developed, history shows that they won't ever be returned to open space. The Park Lands are too important to allow opportunistic development that is not in the best long term interests of Adelaide and its environment. We need careful checks and balances, which are currently missing from the process.

Mark Parnell LLB BCOM MRUP (former Member of the Legislative Council and longest serving Member of the Parliamentary Environment Resources and Development Standing Committee)

Mark Parnell



Mark Russell

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Mark

Family name: Russell

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am against the further encroachment of major building works into the park lands surrounding Adelaide city. I flew out of Adelaide airport a couple of months ago and the photos that I took show that there is now a huge area of parkland missing around the square mile of Adelaide. As much as I love dining out and entertainment, I do not support the use of parkland for further major building works, hospitals, entertainment centres.

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proponent email: plansasubmissions@sa.gov.au

Martijn Van der Merwe

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Martijn

Family name: Van der Merwe

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I object to the re-zoning of the Adelaide Park Lands. The rezoning will enable significant additional infrastructure to be built on the parklands which will mean a loss of green open space. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's Park Lands garlanding both the City and North Adelaide is has huge social and economical value, and is not free land available for development. The rezoning does not acknowledge, capture or secure the true value of the parklands. The parklands provide many ecological and environmental services that will become even more crucial in the future as the surrounding areas population becomes denser and as we start to feel the effect of global warming. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource. Instead of connecting the city to the river front, past development has merely create a new barrier between the city and the riverfront. Creating spaces that are only accessible to private users or those that can afford the services offered by these insitutions. A far cry from public open space. We should be reversing these past losses, not accelerating the loss of green space.

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proponent
email: plansasubmissions@sa.gov.au

Mary Chapman

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Mary Hood

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Mary

Family name: Hood

Organisation: private user of the Riverbank precinct

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I oppose the Code Amendment to allow the building of the nWCH. I do not have faith that the area allotted for the nWCH will provide a large enough hospital for the needs of women and children's health as well as the parking spaces needed. Parking will take ove too much of the Parklands. I do not have faith in the planing processes govt undertakes to design these sorts of necessary public buildings and their attached services. I do not agree with the use of the parklands to build an arena west of Montiafore Road and therefore oppose the Code Amendment to that area. I am not opposed to Code Amendment that allows small scale shop/cafe development between Kintore Ave and the Weir. I am not opposed to the Code Amendment around the Botanic High School precinct.

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proponent email: plansasubmissions@sa.gov.au

Mary Isabel Storer

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Mary Isabel

Family name: Storer

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: It is proudly written in Nantu Wama Park that in 1837 Colonel Light planned our City of Adelaide to be surrounded by parklands. Adelaide is widely recognised as a major influence on the Garden City Movement, 'one of the most important western urban planning initiatives in history'. In recognition of its significance, the layout of the City and Parklands is now on the National Heritage List. It is unconscionable to rezone any part of the parklands to enable built environment to impinge on our enviable heritage. Would New York allow further building in Central Park. I think not. We should be celebrating our heritage!

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proponent plansasubmissions@sa.gov.au
email:

Mary Richardson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Mary

Family name: Richardson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please retain the riverbank as parklands for the public to enjoy as open space. Enough of this land has been stolen or 'gifted' to developers. Please respect the unique gift that Colonel Light planned. Respect the trees and all the creatures that live here. Let future generations enjoy the rights to nature in the city that we have now.

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proponent plansasubmissions@sa.gov.au
email:

Mary Rumbold

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: MARY

Family name: RUMBOLD

Organisation: CITIZEN

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am totally opposed to the Riverbank Precinct Code Amendment. The Adelaide Parklands surrounding the city are unique and MUST be preserved as a green space NOT turned into a commercial area with high rise buildings, cafés, offices etc à la South bank in Brisbane & the gawdy southern side of the Yarra in Melbourne. These green spaces are correctly heritage listed and I strongly object to the government's stealthy attempts to remove them from the city. I am opposed to the redevelopment of the Women and Children's on the parklands next to the RAH. It is a shameful strategy to start the process of carving up the parklands. Adelaide will need every section of the green parklands for the citizens to enjoy given the urban infill which is currently occurring in the city. Once green space is developed it is gone forever. Poor decision making now will mean a terrible loss for the future citizens of this city. The parklands need more vegetation with promotion of its flora and fauna NOT commercial development.

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Matthew Linn

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Matthew

Family name: Linn

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I support the proposed changes - development along the river provides convenience to users and character this this part of Adelaide.

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email: plansasubmissions@sa.gov.au

Matthew van Giesen

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Matthew

Family name: van Giesen

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I support the plan to place the new Women's and Children's Hospital next to the New RAH but i disagree with new basketball/entertainment stadium. The area can be better used as a regional rail station to create better communter connection for family, friends and patients who will visit family admitted to hospital or attending specialist appointments. People from regional SA come to the city for more than entertainment. They come to visit family, seek specialist medical care and more. Having regional communter trains end in the city NEXT/NEAR major medical, social and other precincts will be a better investment for the economy and people of SA. See examples in Victoria and NSW of regional rail programs improving regional communities access to more tourists, better healthcare and spending money locally.

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Matthew Wright Simon

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Matthew

Family name: WrightSimon

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: As noted with my vote in your poll 83% of more than 1000 respondents have said a flat NO, I am in no way supportive of this proposal. This vital natural space has been open to the elements for thousands of years, where it has been home to the Kurna people – one of the most important groups to consider in your consultation and clearly NOT considered in this! Your job is to work for the people of South Australia, for citizens. Not developers, not commercial enterprises who pay to use land that isn't yours to sell or rent. Our parklands are to be shared for all, to provide green space to support the wellbeing of all living things, not as a backdrop for something else that provides access to a privileged few. If you want any more candour, just get in touch.

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proponent email: plansasubmissions@sa.gov.au

Maureen Joyce

I am a very concerned South Australian and shared owner of the parklands that were planned and provided as part of the vision for our state. The parklands are integral to what gives our city a healthy environment. Trees are critical to the quality of the air we breathe and every incremental destruction of this resource degrades our city and quality of the environment. These trees and open space also provide important safe passageways and connections for bird life and refuge for animal inhabitants critical to the ecosystem. In respect for the public ownership of these spaces it is important that no government simply rezones these areas for their own gain - or purported future planning. It is not simply a matter of the government of the day saying they have the power or the right to desecrate public lands- the parklands are not negotiable. Most importantly these are remaining Kurna lands and we must in our actions pay respects to our Aboriginal peoples by leaving them as they are. The Kurna people are the owners of this land and should be given public recognition of this, not some government lip service to 'consultation' and environmental impacts. I do not consent to any rezoning of parklands for infrastructure and development. It is time for governments to realise that buildings do not improve our city and that the public place enormous value on our environment. Regards Maureen Joyce

Maurice Crotti

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Maurice

Family name: Crotti

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I believe the park lands in total should be protected . Any developments however small will over time greatly diminish the unique nature of what is one of Adelaide's greatest assets, its park lands.

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proponent plansasubmissions@sa.gov.au
email:

Max Harris

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Max

Family name: Harris

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: No rezoning of any park lands!! Adelaide is unique, it has the only park with a city inside it. Any green public land needs to be restored and reclaimed, remediated and re greened as required. The park lands need to be preserved for all south Australians. There should be no development on parklands - no hospital, no stadium, no hotels, no cafes and no residences.

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sent to
proponent email: plansasubmissions@sa.gov.au

Max Thomas

I write this email as a 15-year-old concerned about the future of the Adelaide Parklands, noting the intention to rezone Park 27, Helen Mayo Park, and other parts of the parklands to the 'City Riverbank Zone'. Specifically, I would like to question the intention to allow infrastructure development to take place along more areas of the riverbank, including the construction of a new car park and Women's and Children's Hospital.

Our parklands are arguably the greatest thing about living in Adelaide; they are globally recognised for preventing our city from becoming a concrete jungle like Melbourne or Sydney and are continually heralded as the reason behind Adelaide being named one of the most liveable cities in the world, year after year. Around 25% of our parklands have been lost from Colonel Light's initial plans, and I am concerned this number will increase with the government's intention to change planning codes.

However, that isn't to say that protecting our parklands should get in the way of infrastructure projects necessarily. Take for example, the new Women's and Children's. Although a vital piece of health infrastructure, it needn't be to the detriment of our parklands. Numerous alternative places have been raised (Advertiser article from 2018) as spots for the new hospital such as the corner of North Tce and West Tce.

Usually, laws that dictate where stuff can and cannot be built are concrete. I can't just build a coal processing plant in my backyard in Kensington Gardens. Why? - because planning codes dictate so. Why should the rules be any different for the government? It seems that in order to win the next election by building as much stuff as possible, planning rules have to be changed. This ought not to be the case.

A huge portion of young people within South Australia (including much of my own friendship group who frequent the parklands weekly) feel passionately against these new changes to our parklands. Infrastructure comes and goes - but something as entrenched within our environment such as the parklands can never be replaced.

Yours hopefully,
Max Thomas



Maxine Gibbs

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Maxine

Family name: Gibbs

Organisation: A user

Email address [REDACTED]

Phone number: [REDACTED]

Comments: This is an inappropriate change of usage from what is part of the heritage of all south Australians - an open space accessible to all - to an area for diners, workers, hospital patients and visitors, and paying guests (to the "entertainment "precinct). Many people pass through this river precinct daily, particularly on weekends. A beautiful area with a lovely old olive, old gum trees and you are proposing to replace this no doubts with hard surfaces, smaller trees, tall buildings. We don't need another cafe/restaurant precinct- particularly like Southbank in Melbourne. The Brisbane riverbank development boomed then fizzled out. People do not stroll through this area. They go to a restaurant and leave. This means it is accessed and used by to a few . This also means a need for parking. Open the following link and look at the picture- beautiful blue sky, but where are the people? [:https://yoursay.futuresouthbank.com.au/south-bank-over-time](https://yoursay.futuresouthbank.com.au/south-bank-over-time) They are already "redesigning" their Southbank and asking for ideas. And Brisbane doesn't have beaches so attracting patrons should be easy. You are already compromising the use of playing fields and open areas adjoining these areas due to competing parking needs from the existing hospital and sportspeople. I believe this effect will extend to beautiful and well used by the public Bonython Park. On water development? Not appropriate. Where else has that successfully occurred without compromising the outlook for all. Surely you don't expect the public to swim here and hotel patrons would far prefer their hotel pools where they can get a beer, etc. You are just spreading the city further and further out and we are ending up with dead areas in between those where the city is more vibrant. We already have a number of quiet cafe strips. You should be looking at how we can get patronage back into existing areas which has existing infrastructure rather than allowing more to be built, and most inappropriately on public parklands.

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sent to
proponent email: plansasubmissions@sa.gov.au

May Bourne

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: May

Family name: Bourne

Organisation: Private citizen

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I strongly object to the rezoning of the Pinky Flat area. Many people living and working in the city and near city use this area for recreation in a peaceful, natural and health promoting setting including my self and many of my older friends. The development of this area would further impinge on our parklands which are an attractive feature of our city and commercialisation would spoil this. There are already available cafes and restaurants in the immediate vicinity. I have no objection to the the provision of toilets which are sadly lacking in the area especially for older walkers.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Meliesa Judge

"I reject the re-zoning of any part of the Adelaide Park Lands.

The unique nature of our small city is maintained by the encircling parks. I am horrified that you would consider changing the purpose of the parks. Our city is spectacular and the small green circle of parks is what makes it special.

Development is a mistake. The parks should be left open and free of the clutter of buildings. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Meliesa Judge

LIQUID METAL STUDIOS

[REDACTED]

[REDACTED]. Torrens Park. SA 5062

[REDACTED]

fb. Liquid Metal Studios

[REDACTED]

Melinda Fraser

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

The parklands are for everyone. Stop this vandalism!

Mel Fraser Hot Glass

Melissa Ballantyne

Please see attached submission-would you kindly acknowledge receipt.

Melissa Ballantyne — Managing Lawyer, South Australia
(Tue, Wed, Thu)
Level 1, 182 Victoria Square Adelaide SA 5000

P: [REDACTED]

E: [REDACTED] W: edo.org.au

I use she/her pronouns

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EDO recognises the traditional owners and custodians of the land, seas and rivers of Australia. We pay our respects to Aboriginal and Torres Strait Islander elders past and present, and aspire to learn from traditional knowledge and customs so that, together, we can protect our environment and cultural heritage through law.

26 October 2021

Via email plansasubmissions@sa.gov.au

Re: Amendment to the Planning and Design Code -Proposed Riverbank Precinct

The Environmental Defenders Office (EDO) is the largest environmental legal centre in the Australia Pacific, dedicated to protecting our climate, communities and shared environment by providing access to justice, running ground-breaking litigation and leading law reform advocacy.

The EDO appreciates the opportunity to comment on this proposed Code Amendment which will alter policies affecting the parklands if approved. This is a complex proposal with long term consequences for one of our greatest assets. It is vital they are managed appropriately both for present and future generations. Unfortunately, there has been overdevelopment of the parklands by successive authorities and this amendment has the potential to exacerbate this situation by alienating additional land from public use-up to 70 hectares. In our view it is important for many reasons, including the need to ameliorate the impacts of climate change, to retain open spaces for the community and to enhance not detract from their unique features. Instead of further permanent and impactful buildings, public access and greening projects should be encouraged.

At the outset we submit there has been a flawed community engagement process and if the proposal is endorsed it will have considerable impacts on the rights of the community to comment on proposed development in the area. Fundamentally community engagement has not been consistent with the intent of the Community Engagement Charter. This was introduced to facilitate greater focus on community involvement in the policy formulation process but the process for this proposed amendment is flawed for the following reasons. The six week consultation period is inadequate for the community to be fully informed on such a significant proposal- there have been previous instances of longer periods and that could and should have happened in this process. In addition, the community should have been provided with all information including concept plans together with clear documents showing the potential impacts of development. In addition, there was a lack of early consultation with Kaurna members. Community forums were few in number and were on at limited times. Finally, the documentation does not make it clear that if the amendment proceeds the community will not be notified and therefore not be able to comment on future development proposals which is greatly at odds with the level of public interest in the future of the parklands.

The proposed amendment contradicts the 7 statutory principles of the Adelaide Park Lands Act 2005. It is also at odds with established principles in the Planning and Design Code. The proposal gives insufficient weight to the cultural and historical importance of retaining the parklands for public use which are reflected in the principles currently in the Code. It should be noted that the Code only came into full effect in March this year. For example, the Desired Outcomes in the Adelaide Park Lands Zone provide:

- a) A unique publicly accessible and well connected open space system, including the formal city squares, that creates a distinctive landscaped park setting for the City of Adelaide
- b) A range of passive and active recreational activities with a high level of amenity, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of temporary events, such as festivals, concerts and sporting events.

Further, the proposed building policies are inappropriate in terms of scale and height. The proposed Health Sub-zone, for example, would allow for a commercial multi-level car park up to 15 storeys which would have significant detrimental visual impact in the area. There would also be considerable impact on the setting of two state listed heritage buildings namely Adelaide Gaol and the Thebarton Police Barracks. The EDO suggests that it is much more appropriate to retain the historic olive groves and to promote this area as a site for passive and active recreation, and temporary entertainment events.

The proposed Entertainment Sub-zone provides a height guidance of up to 20 storeys providing a 'transition in scale towards the river'. However, the proposed Adelaide Riverbank Arena illustration consultation material provides no such transition in scale down to the river on Helen Mayo Park (Park 27). There is currently a narrow stretch of green parklands created from disused rail lands along the edge of the river. The continuity of this naturally landscaped walking path is included in an educational and regular Kaurna heritage interpretation tour to the western area south of the weir. This would be compromised by the siting of this large building. A further example is the change to the zoning for Botanic High School which proposes new building opportunities to replace open space. However, there are no details of an updated concept plan, nor any clear description of Desired Outcomes. Consequently, there is insufficient information for the community to provide informed feedback.

Please contact the writer via email should you require clarification of any of the matters raised in this submission.

Yours sincerely

Environmental Defenders Office

Melissa Ballantyne
Managing Lawyer-South Australia

Meredith Harrison

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Meredith

Family name: Harrison

Organisation: Meredith Harrison Architects

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I want to register my strong opposition to the is critical that every remaining sproposed rezoning of the Adelaide parklands river frontagequare metre of parkland be retained as parklands as envisaged by Col. Light. Please don't sell us down the river. The parklands are a real feather in Adelaide s cap. To further degrade them is an act of vandalism in an age where we should and do know better. For the sake of our city and our state, access to open space and natural features for all our residents, and by way of valuing and nurturing our flora and fauna, this must be rejected!

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sent to
proponent plansasubmissions@sa.gov.au
email:

Meredith Ide

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Meredith

Family name: Ide

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

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proponent plansasubmissions@sa.gov.au
email:

The proposed uses of the designated sections of land (subzones) in this Code Amendment (CA) is not appropriate for what is currently deemed a unique, well-connected, publicly accessible open space. The Adelaide Park Lands principles in the Code do not allow for high rise buildings. The proposed 20 storey and serviced apartments, commercial, licensed premises, tourism accommodation and community facilities are at odds with the current Planning and Design Code provisions for the Adelaide Park lands Zones

An announcement was made 14 March this year re the proposed Arena, which will subsume the Helen Mayo Park. There was NO mention that the park is part of the unique World National Heritage listed Adelaide Park Lands (2008). There are details and cost factors missing regarding the proposed Arena project. As with the Arena and the Basketball Stadium, car parks will encroach on the Park Lands. There have been comments about degraded areas in the Park Lands area in question in the Riverbank Precinct CA. They can be remediated and the public parks upgraded with suitable vegetation, for the Public to enjoy. That is the reason the Park Lands were designed. To breath fresh air.

Does Adelaide need to be another Sydney, Melbourne or Brisbane? Cannot OUR CITY be different and enjoy prolific green spaces instead of more concrete which we have enough of along the south side of the Torrens in the City?

The area around the Torrens has been important to the Kurna for much longer than European settlement. They relied on the land and understood how to live WITH the land. This Code Amendment will further wrest away their culture. The citizens of Adelaide will be losing part of their History and Cultural Heritage. The Park Lands were recognised locally (Adelaide Park Lands Act 2005) and nationally (National Heritage listed, Adelaide Park Lands (2008)). Where in this CA is there respect for this recognition.? It is an arrogant move to ignore these FACTS for the sake of development.

Many hectares have already been incrementally lost to buildings along the southern Riverbank precincts. Helen Mayo Park (Park 27) a pioneering, medical, educator was considered worthy of a park named after her. What will be left of that park if the Code Amendment is pushed through?

Conclusion.

There has been **no genuine public consultation with no sessions of explanation to the Public**. There is **no transparent Community Engagement process evident**. It has been a very rushed process. What is being hidden from the Public? Park Lands as valued open green space should be retained for the enjoyment and mental and physical benefit of the Public; not for developers' short-term gains. Where is the stress in the Code Amendment on Climate change; an imperative for more, not less open space?

Adelaide's Park Lands need PROTECTION and not to be diminished by the Riverbank Precinct Code Amendment.

Meredith Ide 

Mia Hamilton

To whom it may concern,

I am emailing in regard to the Riverbank Precinct Code Amendment.

As a worker in the 5000 zone of Adelaide CBD, I am highly against the proposed “vision” for the banks of the River Torrens / Karrawirra Pari. I want to see our public parklands remain for the public, where activity is free for all.

While I appreciate the economic impact that may spread through our state, yet we would be replacing an ecosystem that cannot be replaced without hundreds of years of cultivation. The wealth that is brought by those parks includes but is not limited to enriching the mental health and physical wellbeing of the public. Not all of the public can afford private venues for gatherings, nor gyms for their fitness and in a time that limits the capacity indoors, we should place even more value on shared public outdoor spaces.

Thankyou for your time.

Warm regards,
Mia Hamilton

Michael Burden

To whom it may concern

I reject the re-zoning of any part of the Adelaide Park Lands.

As you can see from the signature, I am resident overseas and have been for many years. But I am Adelaide born and bred and remain committed to the city. I have watched from afar while this desecration has been planned and backed by you, the very public servants who should protect them.

The importance of green spaces in the lives of all of us who reside in cities has become ever more obvious, and parks such those Adelaide possesses are the envy of the world, and yet their reduction is connived at by those who should be their guardians.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Adelaide (legitimately) wishes to be an international player? Then those who have control over it should start acting responsibly.

Yours sincerely,

Michael Burden

Author *Lost Adelaide: a photographic record*

Michael Burden

FAHA; Dean; Professor in Opera Studies

[The London Stage Project](#)

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Michael Cornish

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Michael

Family name: Cornish

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please do not change any more of the parklands from natural space into built environments.

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sent to proponent email: plansasubmissions@sa.gov.au

Michael Evans

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Michael

Family name: Evans

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Why can't we build these structures over the railway line? Removes the rail yard eye sore, retains parkland and we get a bonus partial subway!

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email: plansasubmissions@sa.gov.au

Michael Flaherty

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards

Michael Flaherty

Paradise SA 5075

Michael Hallam

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Michael

Family name: Hallam

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The riverbank parklands are an essential part of what makes Adelaide a great city, and should be preserved for reasons of culture, environment, liveability, and heritage. Adelaide is consistently ranked among the top ten most liveable cities in the world, as measured by the EIU global liveability index. This is in no small part due to public access to wide open green spaces, including the parklands. The parklands provide a place for us citizens to escape the noise of the city, go for a quiet walk, have a picnic with loved ones, or simply lie on the riverbank and watch the world go by. Broad availability of green open spaces is essential for the public's mental health. The parklands encircling the city were part of Colonel William Light's original plan for Adelaide, so are an important part of the city's heritage. These are areas of Kurna land that have been left untouched, and we have a responsibility to preserve them for the sake of the city's history and culture. I love Adelaide. These beautiful spaces give Adelaide its character, and make it a unique and special place to live. We should be doing everything in our power to protect and preserve them, rather than throwing them away. Please don't take our parklands away!

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sent to proponent email: plansasubmissions@sa.gov.au

Michael Ladd

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Michael

Family name: Ladd

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Stop eating away the Parklands piece by piece. Enough has been subsumed already. It is the open green space, the space for nature, in the heart of the city that makes Adelaide unique, not more shops and carparks. Colonel Light had the same battle with developers when he had the visionary idea to design the parklands in the first place. This amendment further betrays that vision. Pop up coffee carts and food and wine events by the river are fine and welcome, but not this proposed scale of development. There are several venues close to the river that already provide refreshments, we don't need more. The grab of green space for another entertainment centre and more car parking is particularly egregious.

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proponent plansasubmissions@sa.gov.au
email:

Michael Phillips

I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource

Michael Pilkington

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Michael

Family name: Pilkington

Organisation: Phillips/Pilkington Architects Pty Ltd

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I strongly disagree with development proposals along the northern bank of the lake, between any adjacent road and the water, eg Pinky Flat especially. It is very important to keep that side at the waters edge free of any built form. It is a public park area that has been enjoyed for millennia. The southern side is built upon, apart from Elder Park, which must stay as it is. If on any water edge site, or any other adjacent site, developments are allowed on that northern bank the viewing impact from the ground plane and multi-storey southern bank will be wasted and totally spoiled. Yes, you can get a great view back over the city from there, but it doesn't need buildings to look at it from. it needs benches and a pop-up coffee stall.

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proponent email: plansasubmissions@sa.gov.au

Michael Weightman

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Michael

Family name: Weightman

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am aghast at this proposal to rezone such a significant and prominent portion of the Adelaide parklands for development. This is an act of bastardry that attacks the core of Adelaide's uniqueness and livability - having such extensive parklands so centrally to the CBD is an enormous asset. Destroying heritage olive groves, replacing Helen Mayo park with a stadium and building a massive multistory car-park across the traintracks from the new hospital are terrible and short-sighted plans. It shows a lack of imagination and vision - for example, the carpark could be incorporated into the site where the new hospital is proposed to go. Even better, the current area taken up by the railyards could be covered and these new facilities be built on top (this was done in Melbourne CBD to great effect with Federation Square and surrounds).

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sent to
proponent plansasubmissions@sa.gov.au
email:

Michele Slatter

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Michele

Family name: Slatter

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I write as a resident and ratepayer of the City of Adelaide and someone who chose to live here (more than two decades ago) because of the city's unique attractions. Foremost among those was, and is, its extreme livability. These proposals seriously compromise Adelaide. They appear short-sighted, counter-productive and against the interests of residents, ratepayers, visitors and workers of the City of Adelaide and state of SA. They are designed to eliminate Adelaide's unique, and uniquely desirable, features. They undercut the current government's work in revitalising Green Adelaide, jeopardise the option of applying for National Park City status internationally and prejudice the city's status as an outstanding (national and international) 'Liveable City'. The proposals ride roughshod over major cultural considerations that demand consultation and respect. They destroy natural habitats. They eliminate major environmental options for the wellness and wellbeing of present and future generations. One thing Covid-19 has taught us is the importance of resources that protect and improve mental health and physical well-being. Adelaide's Parklands play a vital role for the increasing numbers of people living in limited space within the city and surrounding areas. Access to natural/green space has been proved to have intensely positive impacts on well-being: we should be increasing, not destroying, it. The proposals regarding the north side of the River Torrens are especially heinous. Adelaide has a unique and desirable character. The setting of the Oval and its associated sports precinct is famed and admired the world over. The footbridge to the Oval has further enhanced this part of the river. Proposals to exchange these uniquely green urban aspects for commercial constructions simply eliminate its character and convert the site to an anonymous 'cookie cutter' city. Why on earth would there be support for such destruction of identity?

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sent to
proponent email: plansasubmissions@sa.gov.au

Michelle Dicker

"I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Mick Telstra

To whom it may concern

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards

Mick

Miriam Hobson

Dear Planning Team,

I, Miriam Hobson, reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks and their connection across the city as a green zone of flow for the few remaining urban wild life we have left. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. This, and not the usual run of the mill developments are what is highlighted in global listings where we make the top 10 of liveable cities.

Hence, our connected green space should be valued by you as it is globally, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Do listen to people like me who regularly play these spaces and the world rankings professionals who pin our liveable to these spaces. This is our future basis for attracting the brightest workers of the future. We are already more than grown up enough to be top of the leader board.

Regards,

Miriam

Miriam

Mr D Clarke

23th of October 2021

Riverbank Riverbank Precinct Code Amendment

Attention: Code Amendment Team
Planning and Land Use Services Division
Attorney-General's department
GPO Box 1815
Adelaide SA 5001

Mr D Clark
PO Box 49
Athelstone SA 5076

To Whom It May Concern

Hope this finds you well, in enough time to be considered.

Thank you for the chance to respond to plans for the River Torrens Riverbank. Was surprise this been done this way instead of being put the South Australia population at the election which is in less than 6 months. The River Toy tens /parklands for are for all not 1% of the public. So no to MacDonald or large story buildings on the area that being talked about. We need all the green space we can get at the moment, as so much is being lost in the suburbs to ugly urban in filled. I wonder who is really behind this push. I think there is enough resurants in the city already.

I understand we require a new Women's and Children Hospital, which in hindsight should be built with the new Royal Adelaide Hospital. For a number of reasons, reduce cost, time frame and so it planned well for future growth. Should protect the Old Adelaide Goal, the olive garden for the police horse and the police traffic school, which brings a lot of enjoyment for SA children.

It good to have the public consultation, but I think should be longer and made more people aware, as everyone can have an equal say. As well affect people even if they do not realise. Was not advertiser well.

I am curious why the question about Parklands/river Torrens is happening now?

Whose idea was this, as now one come out say it was them, and stand by their idea?

Here is some other idea/suggestion.

- Make sure new hospital meets earthquake and flight path requirements.
- Make sure places are easily pronounceable for people with learning disorders, e.g. Dyslexia
- No to 15 story Buildings.
- No to a preschool in the parklands/ river bank
- Protect the botanic Gardens
- No to the large story building behind parliament house, it does not fit in where the area is an entertainment area, to have an office building here.
- I am worry about the security camera, that we pop up to protect us. Who has access to the footage private buildings, police or security? What training and security clearance will these people have?

How long will footage before and when use, e.g. end upon news. Or film people who just walking down the street but do not entry e any zones.

- Worry about facial recognises camera, are they legal and how the access drivers linces without a warrant.
- No to preschool in the parklands.
- Worry about build on green space will create heat islands.
- How about a green bridge next Morphet bridge to create extra, parklands, and use for cafes.
- Please don't be cashless or paper less, as this does not help the environment it just destroys jobs.
- Not a big fan of the statuim but I think will happen anyway, can be for 20,000 or more instead of 15,000 seats. And reduce the cost. Wil I be built with SA people and product?
- Make for built for future growth and enough storage e.g. for power and computer servers.
- Can scrap the new museum as do not understand the cost and location seem narrow view and might be better to upgrade Tandanya?
- Will all new developments be off the gird and water storage and recycled. E.g. building with batteries and ~ackup. So that running cost are reduced. Solar panels.
- How many full time jobs will the new stadium create?
- Will the stadium be on the railway lines?
- Also is there a plan station at the stadium?
- Will the new hospital have a Christian Chapel and non-Christian quiet space?
- Are there plans in front of one of the hospitals, to place a tribute to people lost and health workers during the Covid -19 pandemic and the Spanish flu pandemic in 1919?
- Protect heritage buildings.
- Would they develop Central Parkin New York City?
- What is Labour position?
- Protect the pathway of honour and The Torrens Parade Grounds. What a memorial to the Volunteer Defence Corp, ~Jolunteer Air Observers Corps, Civil Defence or other groups who train for the defence of Adelaide. As there is a plaque to a group that did not fought long side Australia in war.

Another idea I have would be to create on North Terrace would be a new museum instead of current one plan which should expand Tandanya. But for a number reason going ahead, I do not remember much consultation if so was to a select few with invested interest.

Not sure what to call the new museum idea I have but I thought Civil and sport or Stuff and Sport. But be able to show items that are not normally on display and helps other places with space issues.

A sport museum should have been with the new Adelaide oval plan but did not happen for some reason.

Here are some ideas about the new museum idea.

- Areas that should be covered Music Hall of Fame SA, permanent display of the Beatles tour of Adelaide June 1964. (one of the largest gathering of the fame band and in Adelaide history)
- Large Space for touring exhibits as so much miss Adelaide and plans for visits very couple of years.
- A room dedicated to Colonel William Light, as lot of City council items are not accessible to the public. E.g. his guns and other items.
- Formula One (F1) whin it was in Adelaide before it was stolen by the Victorias. It was a special time in Adelaide and should be remembered for the effect on the town. There could simulator type thing so people can feel like a race driver around the track. .

- Showing a replica of the famous plane of The Smith Brothers that went from London to Darwin the first people, they were from Adelaide. And accompanying display of items. So an interactive way of showing the places they went maybe like a flight simulator.
- Have a large area to showcase large objects, e.g. the large Father Christmas that was on John Martins and things for Christmas Pavement and Royal Adelaide Show. And maybe big Scottie.
- In one area, to be dedicated to war experience with South Australia, covering the Boer War, First World War home front and overseas, second World War home front and overseas, Vietnam war covering the protests, and the after effect of war and ANZAC Parades.
- On a wall to list every South Australian at severed in WW1 and WW2 with hopefully photos and a spot for Virtual War Memorial. The reason behind this is that in SA, there is no list of those who served just those who died in service. Also there is Army Museum in Adelaide but it might change, and gives space for items connect to SA to be here not in Canberra Australian War Memorial. Could have collection of old war medals.
- An area, dedicated to Emergency in South Australia, could have Bushfires, floods and earthquake of 1954. So we can remember and learn lessons from Ash Wednesday fire in 1939. A lot of the talk is about what happened in Victoria. So could have an old Country Fire Service (C.F.S) truck and State Emergency Service (S.E.S) vehicle. So could teach children what to do in such events. If you go to Questacon in Canberra, you can enter a container to experience a cyclone. (it more the noise on the outside)
- A display on country life, as a lot of city people would not know what happens and industry outside Gawler. Country people could contribute things.
- Have a virtual reality experience, of what Adelaide was like for pre 1836 to 2000. Wear glass to experience events in Adelaide history, e.g. before settlement, early settlement, 1933 first Christmas pageant, 1945 end of ww2 and 1964 The Beatles, 1997 crows premiership celebration and New Year's eve 1999. These would be able show the changing landscape in the city particularly King William Street. There is similar thing in Darwin in the Darwin Harbour ww2 museum.
- Explain the link Adelaide has to Federation. There was a conference here.
- Have space for functions?
- The museum should have a large area for the storage of objects in the right conditions to take pressure off other places in Adelaide and for the future, ideal would be under ground.
- Sport, there should be display on Football in SA e.g. Aussie Rules, showing the history, community, country and South Australia national Football leagues,
- Space for sports hall of fames, SA hall of fame and also Football and other sports. Show community sport, SA on world stage and Olympics and commonwealth Games.
- Showcase of Cricket in SA and Soccer and Netball.
- There should be a space to display, over the years jumpers of past football clubs of SA, and also Soccer, Hockey, Tennis and Cricket and Netball, and other important clubs.
- There should be a space where members of the Hall of fame are honour; it could be that there are busts.
- Also a room with the plans that failed to be built in Adelaide.
- The Christmas Carols I think is the oldest in Australia.

Covering big events in Adelaide e.g. Royal visits, Pope Visit 1986 and I think Apollo 11 visited as well.

- Also I was thinking, of increasing the plaques on North Terrace, could add people/ events that were over looked when it was created for 150years in 1986 and also for people/ events that have happened since. E.g. Andy Thomas, Christmas pageant, Tour down under, etc.

In the museum there could be a room, to show children what it was to live like before 2000's. The room would have no security camera, so children can experience what like, not be tape and viewed by people they did not know, and not they were innocent until guilty.

Thank you for allowing submitting on paper. As it protects my data and yours. Also, some people need time to submit so a little box need filled out quickly is not idea. Also I do not need a password or save email, which I will never email again.

Also paper creates more jobs and then online forms. Also we spend so much on data protection when there is a safe and better method. So things do not need be online.

Thank you, for the time. So if it was long, things just flowed.

Will I get a response? Protect the parkland for all.

Kind Regards

Mr D Clark

[REDACTED]
[REDACTED]

Mrs J Johns



4th October 2021



Planning & Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

ATTENTION : Code Amendment Team

To Whom It May Concern

ACQUISITION OF PARKLANDS SURROUNDING ADELAIDE

I wish to state that I do not agree with the government taking more and more of the famed parklands which surround Adelaide, although for how much longer the parklands will be there is extremely debatable. This government is hell bent on acquiring everything in it's path these days all under the guise of "progress" which in turn translates to MONEY.

I came from Darwin many many years ago and Adelaide was such a beautiful place with it's lovely trees, parklands and beautiful old homes. Now all you see as you drive around are concrete boxes going up en masse replacing the old character/designed homes. I realise that progress is paramount but I think more balance could be obtained with the disappearance of these dwellings.

As for the parklands they were meant for the peoples use to walk, exercise, enjoy however they like. It is nice to see some open clean air, grassed and tree covered areas available to walk/sit whatever appeals to people to do. Here's a radical idea; just left open unbuilt on etc. etc.? I can hear the developers/government jumping up and down already at that suggestion. What about better designing being executed in the first place with these buildings/carparks before being built? There are also health benefits in different ways as well for the masses. Surely something could be worked out to stop the taking over of our precious parklands which is what you, the government, are all about these days it's just all done in the name of progress, progress, progress, which seems to make it right in the government's eyes.

Why can't we just have some open land with just trees and grass growing instead of all the cluttering up/taking over of the parklands that is occurring. I guess there is no money to be had, sadly.

Kind regards

A handwritten signature in black ink that reads "J. Johns".

Mrs J Johns

Naomi Doolette

Attention Code Amendment Team

Please refer to my attached submissions regarding the Riverbank Precinct Code Amendment.

Regards,

Naomi Doolette

24 October 2021

Attention: Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001
Via email: plansasubmissions@sa.gov.au

To whom it may concern,

Response to Riverbank Precinct Code Amendment Consultation

Thank you for the opportunity to respond to the proposed Riverbank Precinct Code Amendment Consultation. I am thankful for the opportunity to comment because the Adelaide Parklands is an integral to South Australia and an area where I choose to live close to and visit every day of the year.

I oppose, unconditionally, all aspects of this proposal to rezone the Adelaide Parklands.

The Adelaide Parklands belongs to the people of South Australia and is valuable public open space with biodiversity, historic and First Nations value. The Adelaide Parklands is not vacant land available to the South Australian Government to be considered for its own projects or commercial use. It is outrageous that this is even being considered by democratically elected officials and public Departments.

In my opinion, the proposed Code Amendment is a rapacious land grab with no justification. It is inconsistent with statutory principles set out in the *Adelaide Park Lands Act 2005*.

I would like to highlight that Colonel Light's 1837 survey included 2,300 acres [930 hectares] of park surrounding the city. This original survey of Adelaide was of a city surrounded on all sides by parks **reserved from sale and dedicated as parklands for the use and recreation of the citizens**. The survey allocated 9 blocks within this 930 hectares for government buildings and facilities that included a government house, a botanic gardens, a hospital and a cemetery. By 1849, these original 9 blocks were expanded to 380 acres [154 hectares] being set aside for Government purposes – a generous allocation.

In 2021, 760 hectares of Parklands – about 80% – are under the custodianship of the City of Adelaide and this is public open space for all. The South Australia Government is the custodian of the remaining 20% which comprises government buildings and facilities.

I note that the Planning and Design Code, introduced in 2021, designates the 80% as the Adelaide Park Lands Zone and the remaining 20% of the Parklands is divided into different Zones and Subzones with variously named Precincts used by the Government.

This current government bid to take further Parklands is for about 70 hectares or 10% of the total Parklands.

The proposed changes, summarised in the consultation paper, comes at an indisputable cost of health, environmental and economic benefits that the Adelaide Parklands provides the community. These benefits include, but are not limited to, green, treed, remnant vegetation and cultural significant to our First Nations people.

I reiterate my point that the Adelaide Parklands are part of South Australia's colonised heritage and contribute to Adelaide's character as a planned ringed of green public open space.

I find the Code Amendment from the Planning Commission contradictory to outcomes and objectives set out in the 30 Year Plan for Greater Adelaide; the premises of the newly create Green Adelaide Board; and the current Government's application to become the world's second National Park City. At present the government is actively destroying our built and natural heritage through insensitive

infrastructure development that is contributing to the degradation of our environment and City. The Code Amendment is example of this.

The following comments relate to the proposal to rezone the following land from Adelaide Park Lands Zone to City Riverbank Zone and apply the Health Subzone:

- Port Road, Adelaide (Lot 51 in D56872, CR:6166/588)
- Port Road, Adelaide (Lot 13 in D85638, CR:6166/588) – portion only
- North Terrace, Adelaide (Q103 in D111983, CT:6206/719) – portion only
- War Memorial Drive, North Adelaide (Lot 22 in F14185, CT:5803/625) – portion only
- Gaol Road, Adelaide (Lot 80 in D56872, CR 5999/489)
- 18 Gaol Road, Adelaide (Section 549, CR 5756/336)
- Gaol Road, Adelaide (Part Section 1203, CR 5760/638)
- Gaol Road, Adelaide (Section 1204, CR 5761/141)

I oppose, unconditionally, all aspects of this proposal to rezone the Adelaide Parklands, which includes the proposal is to extend the medical precinct to take over Parklands on which the old gaol, the police barracks and the historic olive grove now sit.

The proposal to build a carpark on Adelaide's Parklands to service the new the Women's and Children's Hospital (planned for the site adjacent to the Royal Adelaide Hospital (on land already rezoned from Parklands)) is ridiculous. The media has reported that this proposal is being consider by the Government because it is a cheaper option than building an underground car park underneath the planned new hospital. But it's not acceptable to build this on the Parklands when a carpark under the hospital is a viable alternative. The longer-term cost of losing Parklands is far greater than any short term savings. I would happily pay more taxes than lose precious public open space such as the Parklands for myself and future generations.

The expanded health precinct is becoming an impermeable concrete jungle at a time when more public green and tree filled open space is sorely needed.

Removing the State heritage-listed Old Adelaide Gaol and Police Barracks to create facilities for complementary biomedical and ancillary health services will destroy their colonised historic value and tourism valve these sites provide the community. Rezoning the Adelaide Parklands is not need to sensitively develop and create a tourism destination for these historic facilities.

The following comments relate to the proposal to rezone the following land from Adelaide Park Lands Zone to City Riverbank Zone and apply the Entertainment Subzone:

- Montefiore Road, Adelaide (Lot 102 in D33772, CL:6185/34)
- Montefiore Road, Adelaide (Lot 103 in D33772, CR:5220/707)
- Montefiore Road, Adelaide (Lot 104 in D38136, CT:5522/17)
- Montefiore Road, Adelaide (Lot 200 in D73606, CR:6161/289)
- Montefiore Road, Adelaide (Lot 201 in D73606, CR:6102/700)
- Montefiore Road, Adelaide (S1009 in H105100, CR:5765/293)
- North Terrace, Adelaide (Q104 in D111983, CT:6206/719)
- Festival Drive, Adelaide (Q102 in D59055, CT6230/49)

I oppose, unconditionally, all aspects of this proposal to rezone the Adelaide Parklands, this includes the proposal to expand the City Riverbank Zone to extend the entertainment precinct to claim this section of the Parklands for a sports arena.

Another sports arena may be required in Adelaide but it does not need, and should not, be built on the riverbank within the public open space of the Adelaide Parklands. Furthermore, the associated high rise buildings in this area, with the potential for them to be sold for private or commercial use is not appropriate on the Adelaide Parklands. I remind you that the Adelaide Parklands was surveyed and reserved from sale and dedicated as parklands for the use and recreation of the citizens.

It is an environmentally insensitive proposal to build on the riverbank and completely ignores the stands of remnant and mature trees. The argument that the land is partially degraded and hence has no value is a shameful admission of the Government that it, and previous governments, have allowed this section of the Adelaide Parklands to become degraded. Its degradation is certainly not a reason for building on it but restoring the natural and historic area to its former glory.

The following comments relate to the proposal to rezone the following land from Adelaide Park Lands Zone to City Riverbank Zone and apply the Innovation Subzone:

- Frome Road, Adelaide (Lot 1 in D28393, CT:5988/26)
- Frome Road, Adelaide (Lot 22 in D51367, CT:5696/850) – portion only

There is no reason for acquiring Adelaide Parklands to extend the innovation precinct adjacent to the Botanic High School. Innovation can take place anywhere, in exciting buildings and facilities or other areas of Adelaide.

The following comments relate to the proposal to apply the new Riverbank Subzone to the following land in the Adelaide Park Lands Zone:

- War Memorial Drive, North Adelaide (Section 1640 Park 27 CR:6144/507) – portion only
- War Memorial Drive, North Adelaide (Section 1639 CR: 6144/507) – portion of
- Victoria Drive, Adelaide (Pces 20, 21 Pt 22 CT: 5707/711)
- Victoria Drive, Adelaide (Pt Section 1018 CR: 5737/419)
- King William Road, Adelaide (Section 6026 H105100 CR: 6102/717)
- Montefiore Road, Adelaide (Pt Section 769 CR: 5754/512)
- Park Terrace, North Adelaide (Lots 1-6 F41835 Lt 14 CR: 5807/963) – (River Torrens) portion only

I oppose, unconditionally, all aspects of this proposal to rezone the Adelaide Parklands, this includes riverbank or waterfront precinct, with the intention of sub-letting the riverbank to commercial activities, such as retail and hospitality, and allowing for low rise buildings on the riverbank to house these commercial activities.

The Government appears to have grandiose ideas for turning the riverbank into a replica of other large cities around the world riverbank areas. May I remind you again, the Adelaide Parklands is public open space for all citizen to use. It is not for commercial development. If the government wished to the develop this area, it should have asked the people of South Australian what we want for our riverbank precinct to look like into the future, instead of obfuscation this proposal hidden in a re-zoning application.

I do not want to see this development in my life time. I want open, green, tree filled public space that is accessible to all South Australians. I cannot find one compelling rational argument for this type of development along Adelaide Parklands or the River Torrens / Karrawirra Parri.

Further natural enhancement and restoration of the natural environment on this section of the riverbank is a great idea, so the current government should fund the City of Adelaide, the custodians of the Adelaide Parklands, in partnership with Green Adelaide to enhance the amenity value. In doing so, the City of Adelaide is more likely to improve the riverbank in a manner that recognises the cultural and environmental significant of this area to our First Nations people.

This proposed amendment to the zoning of the Parklands is out of step with community expectations.

I would like to summaries by saying Australia, like the rest of the world, is facing significant challenges from climate change. The abundant scientific evidence is that green, tree filled, permeable, open space is one of the most significant mitigations against the impacts of climate change from a health, environment and liveability perspective. The place I have called home for my entire life, Adelaide, is so fortunate to be surrounded by Parklands that cools it, contribute to the sequestration of carbon and provide habitat and biodiversity. Losing more of my Parklands to governemnts that wish to turn it into

a concrete jungle for short-term gain will reduce the benefits it provides all South Australian. Yet this proposal of land acquisition totally ignores this. I am appalled that a South Australian government would even consider this proposal.

One of Australia's burning, yet unresolved, social issues is reconciliation with our First Nations. Much of reconciliation is based upon acknowledgement of country. Yet the disrespect to the Kaurna nation of the proposed use of these parts of the Adelaide Parklands is ignored in this proposal. Shame on the government. When will we learn to listen to our First Nations people before it's too late?

The built development suggested in the consultation paper can be achieved elsewhere in Adelaide and not on our Adelaide Parklands.

No compelling case has been made for any of the proposed developments by the government. It does, however, highlight that enhancement of the amenities value of the open space Adelaide Parklands would benefit South Australians.

To conclude and make it abundantly clear, I oppose, unconditionally, all aspects of this proposal to rezone the Adelaide Parklands.

Regards,
Naomi Doolette
Mile End 5031

Natale Rudland Wood

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Community Group

Given name: Natale

Family name: RudlandWood

Organisation: Recipes Of Life

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: In response to the proposed changes to the zoning of different public parklands, we are in opposition to the proposed changes with the exception of the Women's and Children's Hospital development. We are community members and residents in the CBD for over 20 years; witnessing redevelopment to accommodate more inner-city living areas for residents, which has positive but requires open green spaces for inner-city residents to have the quality of life, for mental health and aesthetic importance. This has especially been evident during the recent lockdowns during Covid, where we all utilised the parklands to enjoy an open, healthy, clean, safe, and green space to break the monotony of lockdown. There is no reason why the parklands cannot continue to be activated for cultural and sporting events, with temporary pop up venues. We sincerely hope that care, health and safety will be kept firmly in mind when making these sorts of decisions, as the decisions of today affect the generations of tomorrow. Let's not be the generation that destroys the unique 'green belt' for a quick gain today. In closing let's also remember we have a global responsibility to keep open green spaces and repopulate the land with more trees rather than more buildings and pollution, we owe that to the generations of tomorrow too.

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sent to
proponent email: plansasubmissions@sa.gov.au

Nathaly Fiallo

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Nathaly

Family name: Fiallo

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do not agree with the proposals to rezone parts of the Adelaide Park Lands Zone to City Riverbank Zone (entertainment subzone) nor the rezoning of parts of the Adelaide Park Lands Zone to City Riverbank Zone (Entertainment Subzone). The riverbank has always been a great place to take in nature in the heart of the city and this rezoning to allow for cafés, shops and community/entertainment buildings will significantly take away from what is unique about this area. It is already a functioning area for people to meet up and socialize without more facilities that are already available in the general CBD area. It will also encourage more waste production and improper disposal in the area, further spoiling the river and surrounds, and will further impact on wildlife as with more civilian noise from shops and less bush cover, it will discourage wildlife from the area. In regards to the rezoning of the land from the Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone), I believe this to be excessive and dishonest. Keeping the open space link from Frome Road to the Adelaide Botanic Gardens is already achieved as parklands. It should be sufficient to just rezone the high school itself and keep its surrounding lands in their current state. I am also not in agreement with rezoning lands west of the Royal Adelaide Hospital from the Adelaide Park Lands Zone to City Riverbank Zone (Health Subzone), as it includes a significant part of undeveloped parklands. Further developing on establish parklands will detriment the ambiance of the area. It is also excessive for the current proposed work for the Women's and Children's Hospital and I feel it would make the parklands susceptible to future additional infrastructure and new buildings, further detriminting the parklands.

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sent to
proponent email: plansasubmissions@sa.gov.au

Nathan Cunningham

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Nathan

Family name: Cunningham

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am not going to take a fundamentalist and negative position on this proposal. I do stress that proceeding with caution is important. I respect the views of "once lost it will never be returned" hence the need for careful consideration. Small commercial offerings on the banks of the Torrens could be an amazing activator and is worth moving forward. The design and scale being complimentary to the natural environment is important. I am less concerned about the Hospital site or parking proposals to the North Western corner of the city as i would argue that much of that area is not seen in the same light and valued the same was as the river edge parkland environment. Proceed with caution.

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Attachment 5: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Neal Starkey

Begin forwarded message:

From: "Mail Delivery System - BM" <[REDACTED]>
Subject: Delivery Status Notification (Failure)
Date: 26 October 2021 at 8:50:42 pm ACDT
To: [REDACTED]

The following message to <yoursay.sa.gov.au> was undeliverable.

The reason for the problem:

5.1.1 - Bad destination email address 'invalid domain "": no dot found'

Reporting-MTA: dns; ipmail03.adl6.internode.on.net

Final-Recipient: rfc822;yoursay.sa.gov.au

Action: failed

Status: 5.0.0 (permanent failure)

Diagnostic-Code: smtp; 5.1.1 - Bad destination email address 'invalid domain "": no dot found'
(delivery attempts: 0)

From: Alan [REDACTED] >

Subject: Fwd: Building on Adelaide parklands

Date: 26 October 2021 at 8:50:36 pm ACDT

To: yoursay.sa.gov.au

Begin forwarded message:

From: Alan [REDACTED]

Subject: Fwd: Building on Adelaide parklands

Date: 26 October 2021 at 8:48:15 pm ACDT

My thoughts, As well WHAT is THE IDEA in HURTLE Sq. How does it help The people who use the square SO MUCH as a last resort for their lives..... MUCH money \$\$\$ spent on NO RESULT for the people WE are looking after and should be helping!!!!!! PLEASE.. SHOCKING

Begin forwarded message:

From: Alan [REDACTED] >

Subject: Building on Adelaide parklands

Date: 23 October 2021 at 9:06:51 am ACDT

To: letters@thesaturdaypaper.com.au

Pinky Flat
FREEDOM

It's Time

For

Let us as community give Pinky Flat , a no tending, no lockout gates, no cement, no watering, no clearing litter, Future.

Let's bond together to protect it's freedom , so close to high use 'frozen' land. Our gift of freedom , our support for no use, our learning from observation of an unruly and unclipped plot where insects and critters have space to belong.

Perhaps a 30-40 metre community garden could border our untended plot , giving back the area to the community and the bonus of fresh food.

Making the whole area an expression of our delight in freedom and giving, caring and bonding all . Thanks

NEALE STARKEY. Edwardstown S.A.

Nicholas Lawry

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Nicholas

Family name: Lawry

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: Green spaces are super important. Adelaide is really fortunate to have the river and surrounds as parklands. The benefit to Adelaide residents as a fitness and recreation space is world class. More impervious surfaces and buildings will just push more run off into the river making it even more unhealthy. Also, just don't build on First Nations burial grounds. It's a dick move.

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Attachment 5: No file uploaded

sent to proponent email: plansasubmissions@sa.gov.au

Nick Patrick

Please find my feedback to these amendments in the form of response to the initial (main) amendments as outlined in the Consultation document provided by the AG Dept:

The Code Amendment proposes the following key changes:

1. Rezone land west of the Royal Adelaide Hospital (RAH) from the Adelaide Park Lands Zone to City Riverbank Zone, Health Subzone to support the development of the nWCH. While this change impacts park lands, it will facilitate an important public facility in a manner which provides unique advantages from co-location with the RAH (including access to clinical services, training, education, research facilities and helipad to provide direct medical retrieval) and direct connections to the park lands and river to benefit patients and visitors.

Rather than trapping the nWCH within the Park Lands, inhibiting access due to current and inevitably higher volumes of future traffic, it would be more prudent to locate this important public facility within a near-city premises. Options may include the former West End Brewery site or former LeCornu site in Wayville (the latter with inter-health facilities located at the Ashford Hospital make this particularly attractive).

The only benefit to locating this hospital in the Park Lands would appear to be that this is viewed as “free land” if policy can gerrymander the land zoning.

2. Rezone land west of Montefiore Road from Adelaide Park Lands Zone to City Riverbank Zone, Entertainment Subzone (and a portion of land already in City Riverbank Zone changed from Health Subzone to Entertainment Subzone) to support the development of entertainment-related uses (such as an arena) and also allow for health-related uses to provide an appropriate transition from the Health Subzone to the new entertainment precinct.

There is no evidence to suggest a new arena is feasible/desirable in any location. All current sporting/entertainment facilities are more than adequate in servicing local teams and touring entertainment events. Current sporting venues do not “sell out” and additional dates are not required for touring bands (which is the method used to cater for high demand tickets in eastern cities with many times the population of Adelaide).

Again, the only reason for this being touted for the Park Lands is the “free land” that can be obtained through rezoning.

3. Rezone land from the Adelaide Park Lands Zone to City Riverbank Zone, Innovation Subzone to more appropriately reflect the land use and form of the existing Adelaide Botanic High School and its curtilage.

When the RAH site was abandoned, there was a strong case made for returning much of this site to Park Lands. Re-zoning never acts in that direction. In fact we see the opposite occur whereby this amendment is now seeking to take even more Park Lands to “more

appropriately reflect the land use and form of the existing Adelaide Botanic High School” – a school established way back in 2019!

4. Apply a new Riverbank Subzone in the Adelaide Park Lands Zone to the southern and northern side of the River Torrens between Kintore Avenue and the Torrens Weir to accommodate appropriate development (both onwater and off-water) that contributes to the activation of the riverfront.

I had my wedding in Pinky Flat. Over the years, hundreds of thousands, probably millions, of other Adelaideans have held weddings, birthdays, picnics, reunions and a myriad of other events, not to mention the daily swan and duck interactions, anglers, sunbakers, joggers, sightseers, photographers, etc, etc, etc. I query whether any “development” is required at all to “activate” this area. People already utilise this zone because of, and ONLY because of, the attractive green space.

5. Amend policy in the City Riverbank Zone to add an arena to envisaged land uses, and seek improved east-west connections through the Royal Adelaide Hospital and over Montefiore Road.

The most efficient, cost-effective and comprehensive method of improving connections between the current Riverbank Zone and the Royal Adelaide Hospital is to dismantle the current wasteful, ugly, concrete overlay and return all remaining non-built environs to Park Land. An arena will only increase traffic around our major hospital, making access life-threateningly unviable. (Imagine spending \$2b on a hospital that ambulances can't access because Fleetwood Mac are playing to a half-full “new” Adelaide Arena and the combie vans are clogging up North Tce – now there's some publicity for you)

6. Insert additional policy within the Health Subzone to provide for an appropriate transition in built form and improved interface with the Park Lands, and adaption and reuse of the Police Barracks and Old Adelaide Gaol in a manner that complements the historic values and park lands setting.

In other words, create building guidelines to change the conversation. Instead of being unable to build commercial or residential ventures in the Park Lands, it now becomes possible as long as construction adheres to “an appropriate transition in built form”... as decided upon by a committee of engineers, built-form architects & property developers. Once this loophole slips in, it will create a precedent for private construction anywhere in the Park Lands.

The remaining amendments all further erode our Park Lands and are merely a grouping of sub-clauses built on previous encroachments. The Sky City Casino – I note this is mentioned only twice in the whole 89-page consultation document – gained its foothold in our Park Lands by leeching onto the Railway Station. Now, like a golden amoeba, it has grown and oozed onto the Riverbank to completely dominate the precinct. Yet this is defined on page 21 as being an improvement to our public spaces!

It is quite obvious our Government is looking to emulate Melbourne's Yarra with its bastion to all things corrupt and immoral, Crown Casino. This "consultation" and the rezoning of the former Park Lands are a fait accompli. The moneymakers have spoken and Adelaide can no longer describe itself as a city within a Park. Our most identifiable and uniquely famous feature is irredeemably destroyed.

Yours in disgust

Nick Patrick

[REDACTED]

[REDACTED]

[REDACTED]

Nicky Page

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours sincerely, Nicky Page

Nicole Flaherty

To Planning Dept,

I reject the re-zoning of any part of the Adelaide Park Lands.

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We were fortunate to have recently received a state accommodation voucher and used it to stay at the Intercontinental Hotel, walking along the river in the morning was a lovely treat and we saw many walkers, joggers, bike riders also using the parklands. A couple of week's earlier went on the Popeye Gin Cruise for a friend's before heading up to the bar for nibbles overlooking the river which was lovely - there is no need to build up both sides of the river. Again we went to the OzAsia Moon Lantern Festival on the weekend over on Pinky Flat, what a lovely area and great for those "pop up" events - could see it being used during the football, cricket, tennis and fringe seasons for pop up events, but developing the site takes away the parklands for good and also takes away the access for all South Australians to enjoy our lovely riverbank precinct.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards

Nicole Flaherty

██████████

██████████████████

██████████

Nigel Doyle

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Nigel

Family name: Doyle

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: These changes seem to be taking a protected area of parklands and opening it up to development. Whilst this is only for “things like cafés”, a cafe is a building. This means that buildings will be built on existing green space, causing a reduction in green areas, increase in concrete and fast runoff, and decreases from the tranquility and peaceful uncluttered nature of the area. If people want a cafe they really don’t have to go far nothing existing cafes, entertainment centre and proximity of the CBD. This change will open up opportunities for further justifications to de-green this area as “it’s already been built on”. This is unnecessary and counter to the ethos of the parklands.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Nitai Bale

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Kind regards Nitai Bale

Norma Carter

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Norma

Family name: Carter

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: Proposed Rezoning of the Adelaide Park Lands land to Other Uses As a resident of the City of Adelaide for many decades, I am appalled at this proposed rezoning. The State Government and the City Council are together responsible for the conservation and management of this unique treasure, the Adelaide Park Lands. To rezone ANY of this land for building or commercial use is sacrilege. It is not consistent with the Adelaide Park Land Zone nor with the Adelaide Park Land Act 2005. I am TOTALLY opposed to any of the proposed rezoning. Instead every effort should be made to the conservation and enhancement of the natural environment for the enjoyment of all. The proposed buildings should be sited on brownfield land of which there is plenty.

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sent to proponent email: plansasubmissions@sa.gov.au

Norman Etherington

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Norman

Family name: Etherington

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I oppose the rezoning. Every development in Riverbank Precinct except the pedestrian bridge since 2010 has diminished land for community enjoyment. Instead of activating the precinct, Convention Centre expansion, Casino expansion and Lang Walker office tower have deactivated the Torrens Lake perimeter. In the 1880s Mayor Edwin Smith and Thomas Elder delivered a magnificent Torrens Lake experience. The proposed rezoning will put the final nail in its coffin.

Attachment: B-55421_Elder_Park_glory_days.pdf, type application/pdf, 352.7 KB

Attachment 2: People_in_the_Park_bygone_days.pdf, type application/pdf, 427.5 KB

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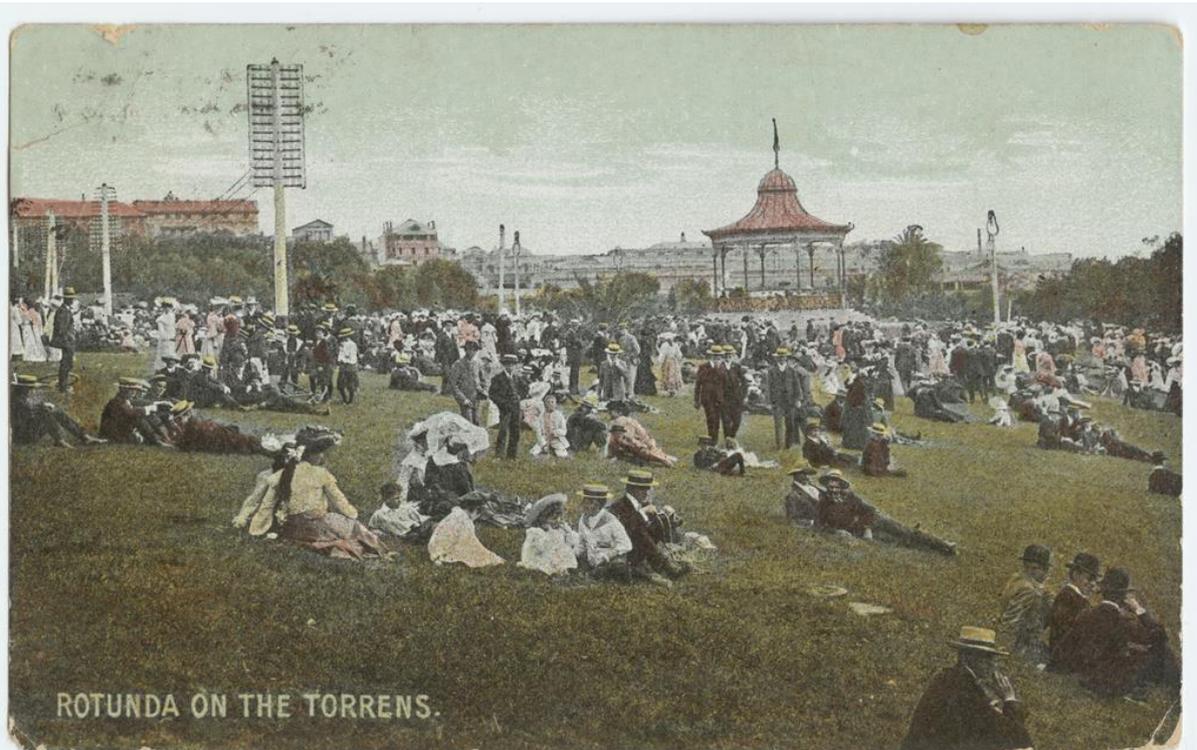
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sent to
proponent email: plansasubmissions@sa.gov.au



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B 39339

Norman Weedall

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Norman

Family name: Weedall

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am against any proposal to change land zoning away from public use parkland! Colonel Light's original design was brilliant, building a city in a park where residents could live, work, play and breathe! Adelaide is already regarded as one of the worlds most liveable cities, why would you want to change it? The verdict from the pub is that this temporary government is more interested in listening to profit motivated developers than acting with integrity and preserving our wonderful liveable city of Adelaide for future generations to enjoy!

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sent to
proponent plansasubmissions@sa.gov.au
email:

Nynke van der Burg

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Nynke

Family name: van der Burg

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource. I am not sure how this is even possible considering Adelaide wants to be a National Park City!

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sent to
proponent plansasubmissions@sa.gov.au
email:

Oliver Bull

To whom it may concern,

I strongly oppose this plan to develop our parklands for commercial use, due to the vacant commercial office space in the city. Also the environmental impact it would have on our flora and fauna.

Kind regards

Oliver Bull

Oliver Frank

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Oliver

Family name: Frank

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: These proposals will help to further destroy the Adelaide park lands that make Adelaide such a great place to live, and belie Adelaide's application to be recognised as a National Park City. All that Adelaide will be able to claim is that it was once a city surrounded by a park. Perhaps the National Park City Foundation can create a category for cities that have destroyed their parks, and Adelaide can be nominated as the first of these.

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sent to proponent email: plansasubmissions@sa.gov.au

Orlanda Mazzei

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Owen Mace

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Owen

Family name: Mace

Organisation: Retired

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This proposal continues the alienation of Light's parklands by adding to the existing sport grounds, playgrounds, coliseums, hotels, "pubs-in-the-park", hospitals, research facilities, universities and so on and on. So much has been lost over the nearly two centuries since Light and his team laid out the parklands that it may as well continue until there are no park lands left at all. Fortunately, I won't see that horrible outcome. No, I don't agree with the planned alienation. In fact I think those parts already alienated should be returned to parkland. Yes, returned to parkland. Have a look at <https://citymag.indaily.com.au/commerce/the-city-council-is-seeking-world-heritage-status-for-adelaides-parklands-and-city-plan/> to see the extent of the alienation.

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sent to proponent email: plansasubmissions@sa.gov.au

Pam DiLorenzo

I could not 'click here' as suggested on the Guestbook. When I clicked, nothing happened. Would appreciate advice re this.

Adelaide Park Lands are WORLD UNIQUE and should be respected if not revered by our elected reps.

I am shocked that Steven Marshall would support destroying our precious park. It is his Hawaii moment as far as I am concerned.

Nana Pam

Pam DiLorenzo
Stepney 5069

Pat Wundersitz

I write as a concerned citizen about the proposed "vision" for the Adelaide parklands. I am really appalled that the State Government considers this land, free to build upon as they wish. Colonel William Light was forward thinking in leaving a band of parkland around the newly designed city of Adelaide, and it has served us well in that time since the late 1830's. I know it was used for grazing animals in the early days and for collection of water to supplement the River Torrens supply, which soon became contaminated.

Over the years the Adelaide City Council has done a splendid job in revegetating with the various stories from grasses to trees, using locally provenanced plants. These encircling lands are the lungs to our city. With rising temperatures and increased traffic we need this space more than ever. The trees absorb CO2 and provide O2, as well as mitigating the effects of road pollution. They are also provide a wind break to the city , a certain degree of temperature control, and very importantly, a place for our urban wildlife. We need this are for our younger generations, so they may enjoy the city as we have been so privileged.

Encroaching on the areas with buildings and amenities is a flagrant regard for the health of those living and working in the city confines. It is also very disturbing that any planner should regard this as a cheap land grab.

I am proud of Adelaide, its lovely old streetscapes, and the surrounding parks, which make it different from other cities. This would not improve our value as a place to visit. We do not need to be like every other overbuilt environs.

Pat Wundersitz

"

Patricia Harvey

"I reject the re-zoning of any part of the Adelaide Park Lands.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Patricia Michell

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Patricia

Family name: Michell

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: Do not let anyone develop any more permanent structures on the Riverbank Precinct! Leave the Riverbank as part of the Parklands with trees and grass, birds & butterflies - an open green space for people to connect with nature.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Patricia Sumerling

TORRENS EMBANKMENT OBJECTION

We reject the re-zoning of any part of the Adelaide Park Lands and wish to lodge our objection to The Riverbank Precinct Code Amendment that permits the SA Government to acquire land in the vicinity of the Adelaide Gaol for its own aggrandisement for the purposes of structures and commercial purposes not needed in this vicinity: a 4 storey car park; a stadium; hospital, and the commercialisation of Pinky Flat.

Although the location was alienated from the Park Lands in 1863 as the Gaol Reserve, (Municipal Corporations Amendment Act 5, 1863), it is still technically part of the Park Lands, of which some part of it, the olive plantation, has been used as such for 158 years.

But now the SA Government is effectively positioning itself to manipulate existing regulations governing the management of the Park Lands, to make a land grab of public land, at no cost whatsoever, to themselves construct inappropriate structures. This act of burglary further diminishes their open access to us, the citizens, and upsets the overall character of the City of Adelaide uniquely swathed with its figure-of-eight Park Lands.

Their costs are 'saved' by 'filching' public lands for their own grandiose purposes by the 'rogue' element of the SA Government. This arm of the government is well aware that to build these structures on land elsewhere, it would actually have to pay the market rate such as the going rate paid for the Le Cornu vacant land in O'Connell Street or the approximate four acres of the Women and Children's Hospital site, that if it were vacated could command prices between 80 and 100 million dollars.

The Adelaide Park Lands are unique in the world. Not only are they already listed on the Register of the National Heritage Places since 2008, they are being considered for State Heritage listing, and further, and most vital of all, being considered for listing on the World Heritage Register.

With them being recognised for registration on three important registers, the State Government has effectively turned its back on this place, now recognised for world, national and local importance.

Yours faithfully

Patricia Sumerling

████████████████████

Maylands SA 5069

██

Author of *The Adelaide Park Lands: A Social History*

Robert Martin

Contact details as above

Author of *Responsible Government in South Australia, Vol.2 Playford to Rann*

Patrick G Harvey

I reject the re-zoning of any part of the Adelaide Park Lands.

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Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world, and should be protected from any development.

It should be valued as such, not sacrificed as if it were merely vacant development sites. Please don't be short sighted, it is a very special resource that belongs to Adelaide not the council, the State Government or any developer

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Sincerely

Patrick G Harvey

Patrick Moran

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Patrick

Family name: Moran

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am very strongly against any building on the parklands

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sent to proponent email: plansasubmissions@sa.gov.au

Paul Anderson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Paul

Family name: Anderson

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Helen Mayo Park should become a healing garden for RAA patients, connected by an elevated plaza. It is the only bit of treed ground within cooe of (W) North Tce., and could combine indigenous and other healing plants/cultures/art etc. Exposure to nature is recognised as having value in health and healing. The symbolism of crossing the rail lines to enter a greened space would bring a sigh of relief to any sufferer. Don't fill this 'under-utilised' park with buildings. Utilise it as a park, we need them.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Paul Bulley

Please do not change the zoning of our parklands. This is absolutely disgusting.

Thank you

Paul Cudmore

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: paul

Family name: cudmore

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: I would ask that all parklands adjacent to Torrens Lake remain free of commercial development. I ask that the Torrens parklands remain open exercise corridors given the rise in mental health concerns which are likely to escalate in future decades.

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proponent plansasubmissions@sa.gov.au
email:

Paul Duggan

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Paul

Family name: Duggan

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: 71 m high buildings in this area will lack balance with the surrounding low rise riverbank structures and create wind tunnels. There is an alarming absence of planning for shaded walkways and separation of pedestrians and cyclists, which will become essential if foot traffic is to be increased. In our deteriorating climate continuing erosion of green space in the absence of compensatory development of new green space can no longer be justified. Traffic congestion cannot be satisfactorily solved at the Port Rd bottleneck that already exists and will be significantly exacerbated by the location of nWCH and new stadium. nWCH is of course too small cannot be increased in height due to air corridor restrictions and will be another expensive rod for our own backs as is the current RAH. I can see how this will satisfy developers but it will further erode the point of difference Adelaide has from any other large city. What fools we are to progressively destroy what's left of the best of Adelaide, namely its undeveloped parklands.

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proponent plansasubmissions@sa.gov.au
email:

Paul Laris

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Paul

Family name: Laris

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: The proposal is incomprehensible to the general public. There is no explanation as to the issue the amendment is aiming to address. The only thing that is clear is an implication that the parklands, the precious green space that makes Adelaide a unique and wonderful place to live, is under threat from a short sighted government dominated by lobbyists from the property development industry. Climate change means we need more green space, more tree canopy, to keep our city liveable. Yet this opaque obfuscatory proposal appears to be about doing the opposite. Please throw it out.

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proponent plansasubmissions@sa.gov.au
email:

Submission two:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Community Group

Given name: Paul

Family name: Laris

Organisation: Western Adelaide Coastal Residents Association

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: WACRA is a member of the Community Alliance of SA and strongly supports the Alliances submission lodged by Dr Iris Iwanicki. We agree that the consultation process is fundamentally flawed in that neither the purpose nor the likely effects of the Amendment are made clear to the public. WACRA concludes that the possible impacts are deleterious to the environment, to the quality of public life, to plans for a greener, less overheated city and are driven by the corporate interests of developers. While its opacity makes it difficult to assess, on the basis of the limited information available, the Amendment appears to be a licence to make things worse. It should be pulled and then resubmitted in a way that makes its purpose and expected impact transparent. Only then will public consultation be useful and honest.

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proponent email: plansasubmissions@sa.gov.au

Paul Turner

I reject the re-zoning of any part of the Adelaide Park Lands.

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Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

At this point in time, any governing body which does not understand the intrinsic value of green space such as parklands, to a healthy and community friendly urban environment, shows a complete lack of judgement.

Yours faithfully

Paul Turner

Pauline McLean

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: pauline

Family name: mclean

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am in favour of developing Pinky Flat into dining places restaurants etc . It works so well in Sth Bank in Qld and brings so many people into the area. Whenever we get to Brisbane we always go there thanks to the city cat ferry Just go for it and stop listening to the people who are against it I am sure more people will want it than those who don't.

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proponent plansasubmissions@sa.gov.au
email:

Pauline Muir

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Pauline Muir

Pauline Payne

I had some difficulties in sending this yesterday - maybe there were too many submissions coming in just before 5 pm! The email did not send at first. However I am in my 80's and spent 5-6 hours researching and working on the submission so would be grateful if someone would check that it was received OK. One of the previous attempts to send it accidentally had two versions but this one is the corrected one with a couple of typos removed. Regards Dr Pauline Payne

From: Pauline Payne

Sent: Wednesday, 27 October 2021 5:19 PM

To: plansasubmissions@sa.gov.au <plansasubmissions@sa.gov.au>

Subject: Submission Consultation Riverbank Precinct Code Amendment

Pauline
Payne

Pauline Payne

[REDACTED]
[REDACTED]
South Australia

BA Dip.Soc.Stud PhD (Adelaide)
Dip.Pub & Soc Admin (Oxon)

Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box1815
Adelaide SA 5001

Submission - Consultation: Riverbank Precinct Code Amendment

I write as an Adelaide based Professional Historian and Visiting Research Fellow in the History Department, University of Adelaide. I have a post graduate qualification in Public and Social Administration from Oxford University, a PhD in History on the Schomburgk era of Adelaide Botanic Gardens (from the University of Adelaide) and work experience in a wide range of areas including university teaching, consultancies in the history and heritage area, health and community work, and local government work. I have worked in the UK, Melbourne and Sydney and am currently President of the Professional Historians Association (SA Branch).

After reading the material provided to the public and after considering comments made by colleagues in the heritage and planning area **I, and many of my colleagues, strongly believe that the Code Amendment should not proceed.**

Adelaide's early planners were world leaders in designing a city with significant access for its citizens to parkland areas and the result made a very desirable feature of the city. However in recent years we have seen a pattern whereby Parkland has been excised from the care and control of the City of Adelaide. **This must stop.** If Parkland areas are alienated, then land previously alienated must be returned to the Parklands in return.

Under the Adelaide Park Lands Act of 2005 the Adelaide City Council is to review its Community Land Management Plan with a report due this November. The present Code Amendment proposal should have been delayed to enable appropriate consultation with the City Council, rather than attempts being made to rush through amendments.

In addition the material made available to the general public has not allowed for proper consultation because it not transparent and clear but instead is badly presented and confusing. This is disrespectful and has

discouraged people from responding. I say this having had experience in carrying out consultation with residents of inner city Sydney in the 1990s.

Given the time constraints of the submission, I will not try to cover material provided by other colleagues, such as Dr Michael Llewellyn-Smith and representatives of the Community Alliance SA inc.

However I strongly believe that the Code Amendment proposals will result in less access for South Australian residents to amenities which at present facilitate health and social and economic well-being. In simple terms our citizens need more access to trees, bushes and grass, not less.

Yours sincerely

Dr Pauline Payne

History and policy consultant

Peggy Brock

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peggy

Family name: Brock

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

There are so many important reasons for not changing the zoning of the Riverbank Precinct from Parklands to a plethora of other zones and sub zones: 1. There is not much that makes Adelaide a unique city. It's most outstanding feature is the ring of parklands creating green open space and enabling a wide variety of outdoor activities. Unfortunately there have been continual encroachments on this space. Rezoning will hasten this trend. 2. Rezoning will impact State heritage listed buildings. Car parks should not be in the parklands. 3. As a historian of Aboriginal and colonial history I am also most concerned about the impact rezoning will have on Kaurna access, especially to Pinky Flat. 4. Why does Adelaide want to blindly copy other cities like Melbourne and Brisbane which lost their riverbanks to industrialisation many years ago and now have redeveloped them? We never lost our riverbank to industry, and we don't want to lose it now. 5. Innovation sub zone- a school should have open space around it, don't rezone the open land currently available to Botanic HS. 6. The past 'entertainment' developments have not brought new life to the riverbank and the bank should not be rezoned so more high rise buildings can crowd the area. 7. The WCH needs open space not a multi storey car park which can be built across North Tce or Port Rd. Adelaide already is a city of car parks. Keep them off the parklands. 8. I have not heard form a single person who is in favour of this rezoning, but plenty of people strongly against it and the government which is going to destroy an important part of our heritage.

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proponent
email: plansasubmissions@sa.gov.au

Penelope Shorne

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Penelope

Family name: Shorne

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This precinct is part of the Park Lands. The Park Lands belong to all South Australians. Park Lands are green space, were always intended to be green space, and should be reserved as such and not built on. The Governments role is to protect the park lands as green space for the enjoyment of all South Australians in perpetuity. This is what you are elected to do. You are our servants and should be protecting our future, not destroying it. It is a totally inappropriate place to be building unnecessary buildings like arenas, office blocks, science buildings, car parks, hospitals and casinos. What the government should be doing instead is protecting the Park lands and returning that that has been alienated already back to park lands. It should be building these up to be as famous as Central park in New York, or Regents Park in London. Green space is essential for the well being and health of the people of this state. This becomes more and more important as the city/state gets smaller and smaller housing blocks and more and more apartments. We lack the kind of large parks that are available in other high density areas, and need to protect what we have remaining, not destroy it. This is far more important to the future of the city and the sate, than entertainment areas. People need somewhere to go, that is outdoors, green and relaxing. Entertainment precincts are not needed and do not perform the vital functions that green space provide. It is also part of Adelaide's heritage and part of what makes it a good place to live. It is what gives us pride in our city and our state. Crummy Office blocks, Casinos, Arenas, Entertainment precincts, etc do not add anything of value to Adelaide and turn it into less livable city. It is short sighted and truly miserable vision of what Adelaide should be. Please do not make these amendments. Put South Australia first, above your political ambitions, and do what you are elected to do. Protect Adelaide's Park Lands.

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proponent email: plansasubmissions@sa.gov.au

Penny Wilkinson

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Penny Wilkinson (Adelaide Gaol Preservation Society Inc. (AGPS))

To Whom it may concern,

While I am not against change or development the plan to re-zone these areas is one of the most appalling ideas I have ever heard. Developers must be rubbing their hands in glee at the thought of getting hold of the most prime land in the city for next to nothing.

What is our State Government thinking? It makes one wonders what sort of deal they have with these developers and if it is moral or even legal.

They will certainly lose countless votes and possibly the next election, if they insist on going ahead with it.

The whole problem started when we were not vigilant enough to stop the building of a major hospital on one of the busiest intersections in the city, against the advice of many medical professionals and others who said it was not adequate. The current proposal to build the Women's and Children's Hospital adjacent to it, is equally ludicrous. Again many medical professionals have said the proposed Women's and Children's Hospital will also not be adequate.

Along North Tce, coming from Port Road towards King William Street we have a number of ugly, concrete high rise buildings on the left hand side of the road, that in no way contribute to the enhancement or beautification of the city.

If we need to have these monstrosities how about we modify them, or pull them down to enable a Women's and Children's Hospital to take their place? High rise parking could also go in that area.

I doubt if any member of the public would object to that plan unless they were either developers or had some pecuniary interest in the sites.

I also doubt the Government would be interested in looking at that idea as they would need to pay for the land they are on. Instead they want to get free land that was set out as parklands and using public monies desecrate not only the Parklands but heritage buildings such as the Adelaide Gaol and The Police Baracks. They say these buildings would be re-purposed. This euphemism is often employed when they intend to destroy or partially destroy these buildings or possibly sell them as has happened with Glenside Hospital.

It would be impossible to use part of the Gaol for redevelopment without destroying the rest of it. Surely the Gaol should stand intact as a testament to the early history of this State and the first settlers lives?

The Government have also not thought about, or ignored the pitfalls of interfering with Kaurna sacred sites. I am surprised that they are even contemplating touching the Aboriginal burials at the Gaol.

I despair that common sense has not prevailed so far and can only hope that this whole idea is dropped.

Please look at other areas to develop that do not destroy our wide open spaces in the city.

Penny Wilkinson

President

Adelaide Gaol Preservation Society Inc. (AGPS)

Persia Janzen

To whom it may concern,

I DO NOT support the re-zoning of the park lands!!! Leave them as they are!

Kind regards,

Persia Janzen

Peta Conor

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peta

Family name: Conor

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Appalling plans - I totally object Leave all as parklands

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sent to proponent email: plansasubmissions@sa.gov.au

Peter

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Peter Adamson

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Peter

Family name: Adamson

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: Our Park Lands are unique and one of the features that enable the University of Adelaide to advertise itself as being in our most livable city. They need to be left intact, including those along the riverbank. The Park Lands were established within 12 months of colonization. Until now their value has been so obvious that they have remained. Who ever thought of the re-zoning proposal thought that that they could improve on a proven winner. They can't. And should be Park Lands be rezoned and built upon the damage will never be able to be undone.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Peter Bolton

Submission one:

To: SA Government -

I wish to express my concern over current SA Government plans to re-zone a large part of the riverbank Parklands – and to build a stadium on Helen Mayo Park. The re-zoning plans would allow multiple types of “development” over a large area of the Adelaide Parklands – such that they would no longer be parklands. The Adelaide Parklands are meant to have been set aside for public use and enjoyment of nature – in perpetuity. The Parklands are one of the features which make Adelaide a desirable place to live, work & study. It is not the role of Council to “rubber stamp” all SA Government plans.

If constructed, the proposed stadium would mean that a large area of public open space would be lost; countless mature trees would be felled: 2 historic rowing clubs would be lost – or have to be rebuilt elsewhere – meaning even more loss of riverbank parklands. Views of the Parklands & river from the RAH – where patients are recuperating - would also be lost. Adelaide already has the Entertainment Centre – which is large & capable of multiple uses. It is also serviced by good transport links & car parking facilities – which have been improved since it was built.

I – and many others - do not support the proposed expenditure of over \$600M of tax-payers’ money on construction of such a stadium – for which there isn’t a clear need. We can see many other more important uses of public funds.

Peter Bolton

(SA resident, Adelaide rate-payer & voter)

Submission two:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peter

Family name: Bolton

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments:

I wish to express my concern over current SA Government plans to re-zone a large part of the riverbank Parklands – and to build a stadium on Helen Mayo Park. The re-zoning plans would allow multiple types of “development” over a large area of the Adelaide Parklands – such that they would no longer be parklands. The Adelaide Parklands are meant to have been set aside for public use and enjoyment of nature – in perpetuity. The Parklands are one of the features which make Adelaide a desirable place to live, work & study. If constructed, the proposed stadium would mean that a large area of public open space would be lost; countless mature trees would be felled: 2 historic rowing clubs would be lost – or have to be re-built elsewhere – meaning even more loss of riverbank parklands. Views of the Parklands & river from the RAH – where patients are recuperating - would also be lost. Adelaide already has the Entertainment Centre – which is large & capable of multiple uses. It is also serviced by good transport links & car parking facilities – which have been improved since it was built. I – and many others - do not support the proposed expenditure of over \$600M of tax-payers’ money on construction of such a stadium – for which there isn’t a clear need. We can see many other more important uses of public funds. I do not support building on the Parklands – or re-zoning large areas of the Parklands for development.

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proponent
email:

plansasubmissions@sa.gov.au

Peter Bradshaw

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peter

Family name: Bradshaw

Organisation: N/A

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am opposed to all these re-zoning changes, which I believe will continue to take parklands away from their original purpose. I would like to see a different approach taken, along similar lines to heritage listing of properties, where development/alterations are forbidden unless certain criteria apply eg vote of parliament. It is time that the community said that enough is enough and the continual whittling away of the parklands has to stop. Can you imagine development being allowed along the edges of Central Park in New York, or in any of the great parks of London, or Kings Park in Perth? Why is it that we seem to think that Adelaide's Parklands are there for the taking? The government should have to work harder to convince people of the need for change in the parklands in order to meet the criteria mentioned above. The changes that are currently proposed are not necessary - the arena could replace Hindmarsh stadium or be built on land acquired in the west end. The car park for the WCH in the west end. Development between Kintore avenue and the Torrens weir is outrageous and completely unnecessary. Think a bit harder about 'linkages'!

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sent to proponent email: plansasubmissions@sa.gov.au

Peter Byrne

I say no to more parkland “development”, particularly fast food outlets and multi-storey buildings.

Thankyou

Peter Byrne

Service Officer,PBS Adelaide

Aged Care and Allied Health Branch/ Health Service Delivery Division

Services Australia

[REDACTED]

[REDACTED]

Peter Chataway

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peter

Family name: Chataway

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The preservation of the City of Adelaide Parklands is fundamental to the character and liveability of our wonderful city. We don't support the re-zonings which would allow any of the following: The building of a Children's hospital in the parklands The building of an arena in the parklands The building of cafés etc on the north side of the river

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sent to
proponent plansasubmissions@sa.gov.au
email:

Peter Croft

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peter

Family name: Croft

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am really concerned that the proposed amendments will substantially reduce the quantum of the parklands and will destroy the character of large segments of the parklands close to the city - particularly the area close to North Terrace. The proposed amendments appear to permit high-rise buildings in significant areas, remove large trees and areas of trees and extend the quantum of buildings in the area. The amendments come across a major land-grab: land at zero cost in a prime space of the city. While there may be some scope for minor amendments to link or "tidy up" existing developments and facilities in the Parklands, the proposed amendments go far too far.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Peter Harrison

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peter

Family name: Harrison

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I think the changes to the zoning will provide a massive benefit to Adelaide, it will mean Adelaide is no longer the only city in the world that hasn't developed the waterway that runs through the city.

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proponent plansasubmissions@sa.gov.au
email:

Peter Klaosen

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Klaosen

Family name: Peter

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Further intrusion into the parklands is totally unnecessary. The development lobby and their political masters seem hellbent on destroying what helps make Adelaide unique. We are one of the most liveable cities in the world- the parklands are a key reason for this. Future generations will look back and shake their heads if we continue destroying the parklands. I saw Steven Marshall was quoted as saying this area is degraded. Even if that is the case, remediate it, not use that cheap throwaway line as a cop-out excuse to destroy it.

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sent to
proponent email: plansasubmissions@sa.gov.au

Peter Lamb

City population growth requires no further Park Lands alienation.

It is the City of Adelaide's policy and the state government's policy to plan for greater population density in and around the city. Currently annual population growth in the city is 2.5%. People who live in the city (like me) live in smaller properties with small or no gardens. To be attractive to city real estate buyers who will increase density, nearby attractive open and green places are necessary. It is not good policy to aim grow the population in and surrounding the city quite quickly while very significantly reducing the green open space available in which people can recreate. The Park Lands are a significant reason why people are interested to move into the city and inner ring suburbs.

City business activation requires more businesses in the city, not in the Park Lands

Each year a significant number of motions and reports presented to the City of Adelaide aim to activate the (capital) city by attracting more residents, workers, shoppers and other visitors to the city. Hospitality businesses in the city are not trading well. The Adelaide Central Market has experienced reduced trade. The proposal to appropriate Park Lands for a hospital and for entertainment and café's removes businesses and customers from the city, and places them outside the city and in the Park Lands. This looks to me like very poor economic policy for growing existing city businesses and increasing people movement around the city. The arrival of Calvary Hospital in the city is stimulating the development new buildings and businesses close to that hospital. There are new hospitality venues, and some that were struggling are now doing better. It makes good sense to place the Women's and Children's Hospital within the square mile, and not to draw more foot traffic out of the city into cafes which further alienate public green space. Eat in the city and be actively and recreate in nature in the Park Lands!!

Reducing overweight and obesity in South Australia requires attractive walking and cycling open green spaces not less?

It is ironic that a hospital for women and children will permanently alienate activity and recreational space where people can exercise and thereby achieve better health.

In South Australia one quarter (25.6%) of children were overweight or obese (18.9% overweight and 7.5% obese) (2017-19). The rates were similar for boys and girls and have remained similar since 2014-15. South Australia had a higher rate of adults who were overweight or obese compared with Australia (69.7% compared with 67.0%). The state cannot afford the poor health outcomes of further alienating natural and recreational space to create a hospital, a massive car park, a stadium and shops. These buildings belong in the capital city of Adelaide and not in Adelaide's famous Park Lands.

In order to make denser inner suburban and city living attractive we need attractive public open spaces. In order to have a thriving and vibrant city more people populating the city for all sorts of reasons is required. Australian has an overweight and obesity health crisis which means quality public green space is required for healthy physical activities and recreation. I am opposed to the Riverbank Code Amendment Proposal for the above reasons. The Proposal is an outrageous land grab, justified for implausible reasons.

Peter Lamb



Peter Langhans

Introduction

Colonel William Light laid out the Adelaide Park Lands over one hundred and eighty years ago for the enduring benefit of the citizens of greater Adelaide. Over the years, sections have been excised for purposes that do not fit the definition of a park, but thankfully, the majority of the Park Lands remain as a park.

However the Riverbank Precinct Code Amendment is a wholesale grab at the remaining vacant parkland along both sides of the Torrens riverbank through the city centre.

The Health and Biomedical Precinct

The expansion of the Health and Biomedical Precinct (City Riverbank Zone, Health Subzone) to the west of the rail yards must not be permitted. This would encroach on the historic Old Adelaide Gaol and Police Barracks that must be retained as heritage tourism destinations.

A parking station for the new Women's and Children's Hospital could be constructed above the rail yards without impacting the proposed new hospital.

The Entertainment Precinct

The proposal to build a new sporting/entertainment arena on the southern riverbank to the west of the Morphett Street Bridge is totally inappropriate (City Riverbank Zone, Entertainment Subzone). Locating a huge new entertainment venue in close proximity to the several others in the area would simply compound the traffic volume to be handled by the Morphett Street Bridge. It would be more appropriate to reconsider the Hindmarsh Entertainment Centre and former West End Brewery sites for an updated arena.

The Active Waterfront Precinct

The proposal to construct numerous café/restaurant facilities along the northern and southern Torrens riverbanks (Riverbank Subzone) is strongly opposed. The riverside areas should largely remain as scenic grassy relaxation areas with pathways for walking and cycling.

It is understood that this precinct is also culturally significant to local indigenous Australians and development in this area would be disrespectful.

Yours faithfully,

Peter Langhans,

████████████████████

██

Peter Lowe

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Peter Nicholls

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peter

Family name: Nicholls

Organisation: Self-employed

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am a retired Recreation Planner after nearly 30 years in that profession. I must strongly oppose the planned amendment that would have the effect of further alienating the public open space that is the Adelaides Parklands. Never was the value of our parklands more greatly emphasised than just a year ago during the period of lockdown in Adelaide when parks kept people of all ages and backgrounds sane! How soon the government forgets! Alienation by attrition causes the public access to the parklands to be slowly eaten away. While demands on (and the value of) land continue to grow daily, LAND ITSELF IS A FINITE RESOURCE. Society today must protect the health and wellbeing needs of future generations. No to the proposed amendments.

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proponent email: plansasubmissions@sa.gov.au

Peter Whittaker

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Peter

Family name: Whittaker

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: This proposed rezoning from historical to health will impact the historical attractions and parklands of the area. Then how many bike paths, access roads and grounds will be deemed unaccessible due to the hospital and parking lot requiring a not only the land for the building structures but also how much land will be fenced off for security/safety reasons. Then also the traffic which will clog the intersections to and from the city. I do not condone this change and how it will impact residents and the historical enthusiasts.

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Philip Ekers

"I reject the re-zoning of any part of the Adelaide Park Lands.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Philip Ekers



Philip Groves

I categorically oppose the Riverbank Precinct Code Amendment proposal. This proposal is the work of a small-minded Marshall Liberal Government bereft of a social conscience regarding the world-famous community-owned Adelaide Park Lands.

The amendment proposal is couched in such meaningless, and in parts, dishonest jargon making it virtually impossible for a lay person to interpret and respond constructively. In fact, I believe it insults the intelligence of the people of South Australia. But then plain english does not suit an unconscionable government's agenda.

The State Liberal Government formed government in March 2018, and proceeded to make its intentions regarding the Adelaide Park Lands very clear by progressing approval for the Adelaide Oval Hotel, despite widespread community and business opposition to the hotel being installed on the Adelaide Park Lands. The Marshall Liberal Government ignored the *Adelaide Oval Redevelopment and Management Act 2011* provisions which many commentators believed prevented the prospect of a hotel development on the Adelaide Oval. It fast-tracked approval for a private company to develop the hotel, and even provided \$42 million in taxpayers' funds for a bridging loan to that company.

It should also be remembered it was the State Liberal Opposition in 2007 who offered to provide the then Labor Government with a private member's bill to progress the construction of a three-story 250 metre long corporate entertainment and pit building in Victoria Park, for private commercial motor racing and horse racing use.

This was after the community and members of the Adelaide City Council fought a long campaign to prevent this development desecrating one of the Adelaide Park Lands' largest and most cherished parks.

It is also publicly known the Marshall Liberal Government has held talks with the Adelaide Crows regarding their long-standing attempts to install their corporate headquarters in an Adelaide Park Lands location, the most recent example being the aborted attempt to takeover the Adelaide Aquatic Centre in the northern Park Lands.

The Marshall Liberal government's 'plans' for the National Heritage Listed Adelaide Park Lands are on full display with the Riverbank Precinct Code Amendment.

It has an undisguised philosophy to use whatever means at its disposal to continue with the privatisation of this priceless, community-owned asset.

I believe the South Australian public, as the owners of the Adelaide Park Lands, must use whatever means at their disposal to prevent this.

Philip Groves

████████████████████

████████████████

Philippe Quoilin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Philippe

Family name: Quoilin

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Adelaide has been described worldwide as one of the most liveable cities. The area alongside the River Torrens and the Parklands is unique and highly coveted by our local community as well as by interstate and international visitors. The area is an oasis of nature and wild life, the lungs of our beautiful city. It is enjoyed by families, children, amateur sport enthusiasts, and is a natural and serene escape to the hectic lifestyle of our city. The proposal has wide ranging implications to the pristine and fragile nature strip of the area and has the potential to benefit developers, and the very few who are wealthy enough to appropriate the area for their selfish and non inclusive lifestyles. I believe that the South Australian Government and Planning SA have no right nor any mandate to make such an important planning decision that will affect so drastically and so permanently our way of life and the beautiful and serene landscape that surrounds the heart of our city. The parklands belongs to the people of South Australia, and to let any government of a limited tenure decide the future of the parklands that will affect future generations is total non sense and dictatorship to the extreme. The only way for the political might to reach an inclusive concensus on this issue is to organise a referendum and seek the opinion of ALL South Australians. But, by sampling the numerous comments posted on social media, I doubt very much that South Australians would tolerate any change to the planning code that would so negatively and so irreversibly affect current and future generations. Let the people of Adelaide, not the politicians, articulate our vision of the parklands as our legacy to our future generations.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Phillip Tann

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Phillip

Family name: Tann

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am deeply concerned that the changes could result in historically significant, heritage buildings such as the Adelaide Gaol and Police Barracks could -- I'm happy to be corrected -- be demolished as part of this. These are important buildings in our history, which threatens so much more if this proceeds.

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proponent plansasubmissions@sa.gov.au
email:

Phoebe Azer

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Phoebe

Family name: Azer

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: The area known as Pinky Flat is a significant Kurna heritage site (Men's business) and should not be further desecrated by further development. it is ultimately hypocritical of the government to leverage Kurna heritage for tourism reasons while proposing to promote is a venue for alcohol consumption. This proposal must, under the Aboriginal Heritage Act 1988 go to the Aboriginal Heritage Committee and through the legislated process of Kurna community consultation. Consultation YourSay is insufficient to inform this proposal.

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sent to
proponent email: plansasubmissions@sa.gov.au

Prof Sabine Dittmann (Royal Society of South Australia Inc.)

Dear Code Amendment Team,

Please find attached a written submission by the Royal Society of South Australia Inc. on the Riverbank Precinct Code Amendment.

We appreciate your consideration and are open to further discussion.

Kind regards,

Sabine Dittmann

Professor Sabine Dittmann (PhD)

President Royal Society of South Australia Inc.

Professor in Marine Biology

Flinders University

College of Science & Engineering

Sturt Road, Bedford Park South Australia 5042

GPO Box 2100 Adelaide SA 5001

P: +61 0 8201 2007

E: Sabine.dittmann@flinders.edu.au

www.flinders.edu.au

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Royal Society SA
C/- South Australian Museum
North Terrace, Adelaide
SOUTH AUSTRALIA 5000
Telephone messaging (08) 8207 7590
Email roysocsa@gmail.com
Web address www.rssa.org.au
ABN 58 648 967 690

Code Amendment Team
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

By email: plansasubmissions@sa.gov.au

27 October 2021

Riverbank Precinct Code Amendment – invitation to comment

The Royal Society of South Australia is one of the State's oldest member-based organisations established for the promotion of science and new knowledge derived from quality research. We now also operate under the trading name "Science South Australia" to better represent the place of science and scientists in the South Australian community. Our Vision for the period 2020-2022 is to encourage the community of South Australia to value knowledge and its application for a sustainable future. We take an active interest in the creation of knowledge-based industries as creators of sustainable wealth and sources of employment and training in South Australia.

We approach the proposed Precinct Code amendments from this statement of our Vision.

The Code Amendments are seeking to convert large sections of the Adelaide Park Land into zones for entertainment, a new hospital, or commercial precincts. Such developments run counter to the known benefit of natural environment for human well-being and the relevance of connectivity in natural landscapes as wildlife corridors. Reducing the natural environment anywhere in the City would also contradict having 'climate smart' landscapes and urban habitats and reduce the potential of the parkland to improve the microclimate in the City. The parklands help climate change mitigation through CO₂ uptake and heat alleviation, thus contributing to reach a net zero target. We consider the proposed changes to the Adelaide Park Land and Riverbank Precinct as a lost opportunity, and instead encourage intensified efforts towards 'Green Infrastructure' and 'Rewilding Adelaide', including restoring the riverine ecosystem of River Torrens.

Our concerns arise further as the proposed rezoning would have impact beyond their immediate area, through parking, traffic, or disturbance and pollution associated with the activities in the proposed developments. The proposals for more built structures such as an 'arena' and other 'activated event spaces' will jeopardise the value the Adelaide Park Land and Riverbank.

Our members know and understand the value of a City environment where knowledge can be developed, shared and applied for the benefit of the community. We suggest "Liveable Cities" are

not generated by masonry and metal structures designed for an occasional special-interest event (referred to in the Code Amendment document as “activated event spaces”) to which some members of the community may attend at some time. The concepts driving the proposed amendments are akin to a stereotypic urban environment and risks losing the uniqueness of Adelaide, which makes it one of the most liveable cities in the world. The Code Amendment document refers to the Park Lands Management Strategy and its focus to “increase the community’s use of the Park Lands (both formal and informal), ensure they are widely accessible to the public and improve the quality of their landscape and facilities.” Parklands and open spaces are significant aspects of our city centre that other jurisdictions envy. Many other cities have irretrievably lost those open spaces, and Adelaide should maintain its lead in the more astute, knowledge-based management of its amenities and their future.

We also respectfully suggest that delineating parts of the area in question as special purpose “precincts”, with further special purpose “subzones” is an artifice. People are not motivated by, and do not limit their activities and their interactions, to an artificial boundary. Consider the failure of establishing two ‘technology parks’ many years ago, one in the northern suburbs, the other in the south. Reflection shows that neither designated area for creating and growing technology-driven industries has been overly successful.

All areas of the Parklands form habitat supporting wildlife. For example, the reed bank between the weir and Morphett St bridge has become habitat to many waterfowl and other reed dwellers that now breed in the area. The plants and animals that inhabit the City Riverbank are locally important systems worthy of protection and promotion as indicators of a healthy, sustainable, knowledge-based “Liveable City”. The proposed changes entail fragmentation of habitat, loss of ecosystem services, and risk an increase of voracious feral cats and foxes.

We acknowledge parts of the Torrens in the City Riverbank Zone are in need of better management. Areas labelled by planners as “degraded” should not to be regarded as easy sites for clearing and the construction of only more buildings. They are opportunities for city planners and governments to show their community what knowledge-based planning can achieve. “Degraded areas” of the city’s Parklands are in need of remediation (or at least stabilisation), rather than loss to yet more of the built environment devoid of open spaces supporting plants and animals.

In summary, we regard the entire Adelaide Park Land and Riverbank Precinct as an important section of Adelaide, one that provides places of learning, the development and exchange of knowledge, and natural support for human and ecosystem health. The cultural institutions housed in the Riverbank Precinct are highly regarded interstate and overseas. We suggest that the area of the Adelaide Park Land and Riverbank Precinct be retained and improved through the application of knowledge and care to function as a climate smart natural environment. A science-based approach can provide a better, more sustainable and liveable city.

Yours sincerely,

Professor Sabine Dittmann
President

Prue Aitken

I reject the Government's so-called "vision" for the Adelaide Park Lands.

Open Green Public Spaces do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage.

Prudence Aitken's

Prue McElwain

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Prue

Family name: McElwain

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please do not go ahead with any development or removal of the parklands or outdoor areas. These areas are an integral park of our beautiful city and once gone they will never be replaced. Please resist the developers and planners as their short sightedness will see our green city turn to concrete. We are renown for our beautiful parklands surrounding the city and we should keep these areas for our future generations and not just show them photographs of what it used to be like.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Rachel Stark

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Rachel

Family name: Stark

Organisation: Custom Wines

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Parklands are not 'vacant land' for Government use. Adelaide is a vibrant and beautiful city and, unlike the riverbank precincts of the other major capital cities of Australia, the green areas are a key feature. Every year more and more parklands are being eroded - this needs to cease. It is a wildlife haven and a place where people can enjoy temporary events and be in touch with nature - please don't steal our heritage.

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sent to
proponent email: plansasubmissions@sa.gov.au

Rachel Stone

To Whom it may concern,

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards

Rachel Stone
NAIRNE S.A.

Rachel Thamm

Dear Sir,

I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please listen.

Please.

Yours Sincerely,

Rachel Stark

Rae O'Connell

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: RAE

Family name: OCONNELL

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: With plans to increase the residence in the CBD then there will be even more importance on the open public spaces we have for their recreation and wellbeing, especially as they will be living in apartments with no gardens or outdoor spaces. If you keep chipping away at these public spaces you will never get them back and the parklands are what makes Adelaide unique. It is the easy way out of planning for the future infrastructure of the city. What would you do if it was not there?

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sent to
proponent plansasubmissions@sa.gov.au
email:

Ralph Clarke

Having studied your plan for the riverbank, count me as being utterly opposed to it. There is no place for the privatisation of public green space. There is too little of it in any event. In an era of climate change with SA and Adelaide destined to be stuck with ever increasing temperature increases we need more open space and greater green canopy cover for the City to be more habitable, let alone being a more attractive place for visitors to come to Adelaide as well as being an attractive place for new migrants to come and settle.

There are more than enough places in Adelaide CBD which offer, food, wine and apartment blocks for people to live in and/ or enjoy. We don't need an arena on the riverbank either, if the Entertainment Centre is too small, why not build a bigger one in situ, the entertainers are not saying they will only come to Adelaide if the Centre itself is not in the Parklands, there are plenty of brown built areas in the Greater Adelaide area which can be used instead.

To have a policy which would allow a privileged few only to be able to afford to live in an apartment on the public lands is obscene! When will we have a State Government of either major party stripe that is not open to the corruption of Developers, whether it be by political donations to their parties or by their threats to campaign against them via sympathetic news organisations such as the Murdoch press, to get their way. Developers by their very nature are greedy and avaricious who act without regard to the public good and should be shunned in this debate, or least make sure anyone dealing with them has been washed with phenol after their meeting!

I refer to the Guardian Weekly 8th October 2021 Vo. 205 No.16, At pages 22 – 23 under the heading "Green Streets" the article commences, " Across the world, people are welcoming wildlife into cities, where more than half of us live. Here are 10 of the most exciting and innovative urban biodiversity projects where nature meets civilisation". The article goes on to describe as to what is happening in cities as diverse as London, Los Angeles, to San Jose Costa Rica and Milan. I commend the article to you to read. No where did I find that the answer to making cities green again include the privatisation of public parklands nor the desire to build cafes, office blocks, sports arena's or privately owned apartments on parklands.

The government's proposals is a throw back to the 1950's when whatever a developer put forward was seen to be progress. We have grown out of that cringeworthy situation today. I hope that the government will see the sense is keeping the parklands for what they are meant to be, an area of tranquillity, recreation passive or active and where families can just get out in the shade and enjoy their parklands, not the developers parklands!

Regards

Ralph Clarke



Ravennat12

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Ray Walter

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: ray

Family name: Walter

Organisation: Nil

Email address| [REDACTED]

Phone number: [REDACTED]

Comments: The land for this proposal belongs to the people, and was bequeathed to them for ever, the parklands are the lungs of Adelaide, and RE Creation of the people. Too much of the Parklands have been stolen by stealth

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sent to
proponent plansasubmissions@sa.gov.au
email:

Rebecca Beasley

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kind regards

Rebecca Beasley

Rebecca Faulkner

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Rebecca

Family name: Faulkner

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: Please see attachment for my submission.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Public Consultation Submission Riverbank Precinct Code Amendment 2021

To members of the consultation committee

I am highly concerned and against the proposed rezoning that are included in this consultation. This doesn't mean that I am against developments such as a new Women's and Children's Hospital. I'm in favour of the new hospital going ahead. I have many concerns some of which relate to the consultation period and process itself, others to do with the new proposed rezoning and what's included or more likely what's not included in the changed zones.

Firstly I believe that the consultation period and process has been inadequate considering the significance of the development proposed and the significant area that will be impacted by the proposed developments and rezoning. I believe that the consultation documents that have been released for comment don't provide enough detail about proposed and future developments to make a clear judgement. For example in the Torrens Riverbank Zone 'applied to better accommodate development that activates the central area of the Torrens riverbank while maintaining the unique park lands setting.' What activities are these? And what future activities are you proposing. There are areas along the current river that allow for some events with limited impact upon the parklands and the natural environment. I don't believe these activities need to be all year round nor that a change is required for more permanent changes.

I don't believe that much of this rezoning is required, nor do I think that much of this development not going ahead will impact the state's finances negatively. I believe some rezoning in regards to building the new hospital is required however wide rezoning across the entire precinct including to build multi story buildings along the River Torrens isn't required. I don't believe that all of this development which is stated as financially imperative for the state's financial future is required nor that it is imperative. I see some of this rezoning as a land grab firstly away from the parklands as the land was originally intended for. That a more targeted development and consultation process would be better suited e.g. one for the new hospital, one for the proposed new stadium. This would allow us to analyse the impact more directly and the process just doesn't give the green light to random unknown development within these proposed zone changes. It's these changes that will have unknown but likely significant impact upon the local area and biodiversity. The proposed rezoning changes result in more deforestation, loss of precious open community space, loss of biodiversity and habitat. It's a loss of more land within the Adelaide Parklands which is currently seeking World Heritage Protection. This development whilst some of which is for the service of the SA Community e.g. a new hospital but others which appears simply for privatisation and a money making scheme for more unneeded development within the parklands and profiteering off of this asset. This goes against Colonel William Light's vision for Adelaide as a park city, surrounded by parklands for the health and benefit of the SA community. Our parklands are already under threat and these proposed developments would further increase the city encroachment on the parklands and an erosion of the lands. In addition we are in increasing need for greenspace which not only provides the essential services of cooling our hot cities but provides the services of supporting a strong local biodiversity.

I'm for the building of the new Women's and Children's Hospital though I am against the proposed location of the carpark into Kate Cocks park, the loss of the significant Olive Grove that was planted by Prisoners of the Old Adelaide goal. I don't believe it will as stated on your consultation site 'provide opportunities to be adapted and reused in a matter that also compliments the historic values and parklands setting'. In fact, I believe it will do the opposite it detracts and removes the historic values and the park lands setting from the site completely. As a student twenty years ago, I ago visited the goal on a school camp and learnt about the heritage of the location. This included the importance of agriculture and that the Olive Grove and the surrounds outside the goal's immediate vicinity was to the functioning, rehabilitation of the prison and the prisoners, which is an important part of SA's history. In addition, this olive grove is used by SA Police horses. I don't see why this significant and important open space and heritage should be lost for a multistory carpark which will indirectly impact on the heritage listed Gaol as well, as such why an alternative location can't be found. Adelaide City Council have a plan to reduce the number of people driving into the city. In a time with increasing climate change where we need to be aware of emissions, when the Adelaide City Council has made it clear that it aims to reduce the number of cars coming into the CBD, increasing ride share availability there isn't a need for the carpark. If there is a need for it which I don't believe there is why can't a more suitable location be sought.

In regards to the development of the new Riverbank Zoning, Medical Zone and Entertainment Zoning there would be an impact upon the biodiversity of the region. Flora and Fauna monitoring of the areas proposed in this rezoning documentation have identified new species. This shows that there is the potential to discover more species in our parklands and surrounds and shows that the true impact across the region is unknown. The ecological survey identified the Chequered Copper Butterfly which is classified as rare and the Eastern Water Skink classified as vulnerable. Furthermore the distraction and removal of habitats e.g. removing vegetation, removal of significant trees (loss of habitat), loss of low level shrubbery for food sources. This would be through not only the development of the region, destruction of habitats, impact of increased human traffic and threat to local endemic species of the region. The loss of many significant trees along the River Torrens that provides hollows, homes and food to many birds and other local wildlife. It takes some of those trees 80years to develop hollows suitable for homes and yet the plan includes the loss of these trees and crucial habitat. In addition Helen Mayo park is already used for community space and for events e.g. circuses and as such I believe it can continue to be used for these purposes without the rezoning.

I hope common sense prevails and we can conserve SA Heritage, protect species and biodiversity, create a city that is adaptable to Climate Change and for the future as well as allowing the development of essential services such as the new Womens and Children's Hospital and minimise the impact of future developments e.g. a new stadium. Making planning processes clearer in the future.

Regards

Rebecca Faulkner

Rebecca Wenzel

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Rebecca

Family name: Wenzel

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: My concern regarding this rezoning is that the area will become subject to extensive development. Whilst advertisements for this rezoning say there will be a focus on retention of natural values and heritage I do not believe this will be the case. None of the rezoning options place value on retaining or enhancing natural assets such as trees planting or revegetation. We absolutely do not need another 'arena' and if we are to make our city more resilient to climate change, we need to prioritise green spaces and mature vegetation in particular as it provides short and long term benefits to increases in temperature. These new developments will add little value to the riverbank if there are no green spaces left save for occasional patches of grass. It is also unclear whether the proposed rezoning has the support of the local Aboriginal groups. The voices of Adelaide's traditional owners should be key in deciding what sort of development if any is undertaken near what little natural features remain. I would support this rezoning if there was a greater focus on enhancement of our natural resources and values, support from traditional owners less focus on development, particularly larger scale/unnecessary developments like an arena. Small scale development that favours local businesses and complements natural values would be more beneficial.

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sent to
proponent email: plansasubmissions@sa.gov.au

Regina Thomas

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: regina

Family name: thomas

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: How dare this government sell off open space parkland unique to this state, country and the world, for the purpose of developers. It is not yours to sell, it belongs to the people to whom you are elected to serve. Maybe thinking outside the box and create more usable space for recreation and enjoyment should be considered. Look at central park in New York, vast parks in China.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Rhiannon Davids

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Rhiannon

Family name: Davids

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I disagree with the proposed Riverbank Precinct Code Amendment. Any loss of park lands will likely never be regained in the future, and there is plenty of vacant and even derelict buildings in the CBD itself. I think it's worth spending more to develop existing CBD buildings then taking the 'easier' route of building on green areas. New York and London do not cut into their core city parks like this, they preserve them as a valuable asset increasing the overall value of all surrounding neighbourhoods and providing a treasured shared space for future generations.

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proponent email: plansasubmissions@sa.gov.au

Richard & Claire Turnbull

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards,

Claire Turnbull

Richard Pomfret

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Richard

Family name: Pomfret

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: The Parklands are Adelaide's greatest heritage. The alienation from public to private use has accelerated over the last generation, starting with the Next Generation private gym/club facility east of Montefiore Hill. It is crucial to draw a line, beyond which further erosion is not permitted; the river is an obvious border. In the area under discussion, no rezoning should occur north of the river. The proposed site for the new Women's and Children's Hospital makes sense, but there should be an offset of returning the current WCH site to Parklands.

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sent to proponent email: plansasubmissions@sa.gov.au

Richard Ruffin

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Richard Ruffin

Family name: Ruffin

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: I am strongly against further development of the northern side of the Torrens between Kintore Ave to the Weir. This area is important parklands for the health of the environment & the community. Commercial or retail development will adversely affect the health of the parklands & the health of the community.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Richard Twidale

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Richard

Family name: Twidale

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I object strenuously to the proposed rezoning of (a) the southern and northern sides of the Torrens between Kintore Avenue and the Torrens Weir for use for cafes, shops and other developments, and (b) the land west of Montefiore Rd. for use for entertainment. Both represent further unwarranted encroachments into the parklands for commercial purposes. The use of the banks of the Torrens for cafes, shops and other developments is particularly offensive given the already grotesque over-development of the area north of the Torrens and west from King William St, with a succession of buildings viewed by many as ugly and over-scale, cramped into too-small plots, in some cases completely overshadowing the few historic buildings remaining along that stretch. This proposal is also insensitive, given the number of similar business in the city centre and elsewhere which are struggling to survive the effects of the pandemic. I urge the authorities to do their duty and drop these proposals.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Richard Webb

REFERRED SUBMISSION BY DR. IRIS IWANICKI (COMMUNITY ALLIANCE SA Inc)

Rita Smith

Dear planners,

I am most concerned about the proposals being aired to add more commercial buildings to the Riverbank area of our lovely city. The monstrosity of building currently being built alongside the Festival Theatre is bad enough. I don't believe there is so much need in the CBD for accommodation, either for people or office space that this area should be dominated by such an eyesore.

I believe, also, that we do NOT need another arena for whatever reason to subsume what is a valuable piece of green parkland across Montefiore Road. We already have an under-utilised Entertainment Centre almost adjacent to the parklands, and the renovated Adelaide Oval, I believe, still has lots of capacity for sporting or rock-concert-like events. And how much more valuable parkland would be snatched to use for parking?

The Police Barracks area has already used up valuable parklands and this was done in a bygone era when perhaps the value of green space was not so precious as it is now. It probably could be re-developed to complement the needs of the nearby health precinct. Likewise, the olive-tree area, probably does not have the intrinsic value of the other parkland areas north of the river. In the hills, olive trees are considered feral because of their propensity to be spread by birds. The Gaol should be retained as an interesting piece of history and promoted for tourism.

For many years of my life I have lived in arid areas and when we moved to Adelaide we delighted in the access to the parklands which is provided by Memorial Drive. The native eucalypts and the grassed areas, particularly the greened ones, have a restorative effect on one's psyche. Already I have seen disused school ovals sold off for housing instead of the opportunity being taken to provide green space in the middle of the urban sprawl. Please do not make the same mistake by allowing commercial interests to take over "Pinky Flat" or any other areas adjacent to the river. These areas are vital to be not only the lungs of the city, but to enhance the attraction of the area for tourists.

Please realize that I am not a lone voice crying in the wilderness, as I have many acquaintances who are similarly horrified by these proposals. Nor am I a killjoy, but I believe there are already plenty of nearby businesses providing food and drink for those who must have alcohol wherever they are. There are already too many brawls, etc in the vicinity of Hindley Street. We do not need our precious riverbank to degenerate to a similar degree.

Sincerely,

Rita Smith

██████████

████████████████████

Rob Cheesman

Sir

Please find my submission attached

The attrition of the Adelaide Park Lands for other than the intended uses has been continuing for over 150 years (see Kingston's letter attached dated 1877)

In recent years SA government has become more aggressive in rezoning the land to other than park land use.

The continuing retention of the park land as originally laid out is entirely valid and essential to the lasting integrity of Adelaide.

The current Code Amendment proposal is invalid, untenable and entirely unsubstantiated.

I wish to make a representation in person against the proposal

Please confirm receipt of this submission

sincerely

Rob Cheesman AM

[Cheesman Architects](#) is taking steps to minimise the spread of Coronavirus (COVID-19)
Business integrity and health safety measures are being updated as evolving circumstances require.
At present we are minimising face-to-face business activities and some staff are working remotely.

Rob Cheesman
Architect, Master Planner

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**Written submission on the
RIVERBANK PRECINCT
PLANNING AND DESIGN CODE AMENDMENT**

To the Chief Executive of the Attorney-General's Department by close of business Friday 22 October 2021.

- Post: GPO Box 1815, Adelaide SA 5001 OR Email: plansasubmissions@sa.gov.au

NOTE: Your submission will be published on the PlanSA website. Personal addresses, email and phone numbers will not be published, however names and company details will be.

Submitter Details (required)

Name: Assoc Prof. Robert CHEESMAN

Organisation Name (where relevant):

Address: 304 The Parade KENSINGTON 5068

Email: [REDACTED] Phone: [REDACTED]

Note: the details supplied above will be recorded as the person / organisation who lodged the submission

Comments / submission details (please attach additional pages and / or supporting documents as required)

• see Attached Statement.

21 October 2021

Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001

Ref : Riverbank Precinct Code Amendment

Submission by
Adjunct Associate Professor Rob Cheesman AM. B.Arch., M.Litt., LFRAIA, PIA, FRSSA

Since graduation in Architecture from University of Adelaide in 1964 and in Urban Design (M.Litt) from Cambridge University 1978, I have practised as an architect and urban designer in Canada, Britain and Australia over a continuous period of more than 50 years. During that time I have taught architecture and urban design at Adelaide and Cambridge Universities

I have served on City and State Planning and Urban Design committees and review panels, often as chair. I have retained memberships of the Planning and Architectural professions. I have been the National President of the RAI (now the Australian Institute of Architects)

As a consultant to the City of Adelaide I drafted the first Review of the City of Adelaide Park Lands in 1985. In 1986 I published a book *Patterns in Perpetuity, New Towns, Adelaide, South Australia; a Study of Adaptive Planning Processes*. (1986). Adelaide: Thornton Press.

I wish to lodge this statement in support of my (and widely held) serious concern regarding the very loose proposal by the South Australian Government to progress the rezoning of sections of the Adelaide Park Lands by a code amendment. The proposed uses are quite contrary to those defined and laid out by William Light and continually reaffirmed by G.S. Kingston, Charles Reade, Stuart Hart, Archie Grenfell Price, Gavin Walkley, George Clarke and many more over the past 185 years.

In the circumstances, the proposal must be rejected.

In purporting uses entirely at difference with the intended and perpetual use, the proposed rezoning will give rise to significant attending standards and requirements which will be detrimental to the Park Lands and to the City of Adelaide, and to the surrounding metropolitan area.

Any suggestion by the State government that there is precedent for such rezoning for example, in the more recent transfers of public Park Lands to private enterprise is unfounded and invalid.

The background, precedent, purpose and evolving policies in relation to the City of Adelaide and the Adelaide Park Lands are thoroughly documented in *inter alia* but more particularly in my book, *Patterns in Perpetuity* (1986). Adelaide: Thornton Press and in Michael LLewellyn Smith's book, *Behind the scenes: the politics of planning Adelaide*" (2012) The University of Adelaide Press.

The Park Lands Act 2005

The passing of the Adelaide Park Lands Act, 2005 represents a reasonable consolidation of the intention and validity of the Adelaide Park Lands as intended. It is widely supported.

The *Adelaide Park Lands Act, 2005* established a legislative framework that promoted the special status, attributes and character of the Adelaide Park Lands. It provides for the protection of the Park Lands and for their management as a world-class asset to be preserved as an urban park for the benefit of present and future generations.

The following Principles of the Act should be noted:

(a) the land comprising the Adelaide Park Lands should, as far as is reasonably appropriate, correspond to the general intentions of Colonel William Light in establishing the first Plan of Adelaide in 1837.

(b) the Adelaide Park Lands should be held for the public benefit of the people of South Australia, and should be generally available to them for their use and enjoyment.

(c) the Adelaide Park Lands reflect and support a diverse range of environmental, cultural, recreational and social values and activities that should be protected and enhanced.

(d) the Adelaide Park Lands provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City in a manner that should be recognised and enhanced.

(e) the contribution that the Adelaide Park Lands make to the natural heritage of the Adelaide Plains should be recognised, and consideration given to the extent to which initiatives involving the Park Lands can improve the biodiversity and sustainability of the Adelaide Plains.

(f) the State Government, State agencies and authorities, and the Adelaide City Council, should actively seek to co-operate and collaborate with each other in order to protect and enhance the Adelaide Park Lands.

(g) the interests of the South Australian community in ensuring the preservation of the Adelaide Park Lands are to be recognised, and activities that may affect the Park Lands should be consistent with maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

Adelaide and the Park Lands, the economic purpose

Both in Douglas Pike's references (*Paradise of Dissent – South Australia 1829 – 1857: 1957* and *Dreams of Adelaide's Founders 1952*), and in my book (*Patterns in Perpetuity*) we describe the significance of E.G. Wakefield's economic theory for settlement.

Immediately prior to the settlement of South Australia, planned colonial settlements (for Canada in particular) had failed because they were not economically resilient. Generally, the land was sold ahead of settlement to absentee landlords and the town acres were not contained ie., adjacent lands were purchased and developed, leaching the primary settlement value and leading to the general devaluation of the settlement.

In 1831 Wakefield approached the social reformer Jeremy Bentham to develop his ideas for the colonization of South Australia. Soon after, Bentham prepared a base principle for the foundation of an ideal settlement. He termed this the "*the vicinity-maximising-and-the-dispersion-preventing-principle*" of settlement. This was the basis for his economic structure and land tenure system for a successful settlement. It was in effect a principle of urban consolidation, a principle of spatial containment and concentration which continued to be upheld throughout the ensuing wrangling and debates surrounding the ideal form of settlement for South Australia.

As a consequence, the (Wakefield) economic plan for Adelaide was purposely realised through

- the containment of the town acres by the common land – The Park Lands
- The sale of the town acres only to landed settlers

These two principles alone provided certainty for a resilient land economy through an increase in land values (limited and contained supply of land and increasing demand for land purchase) and therefore the very economic and social surety of Adelaide. This was in distinct contrast to the failure of so many other colonial settlements world-wide.

The Bentham/Wakefield economic theory as realized in Light's Plan, and with the endorsement of George Fife Angas and the commissioners **is unique in the world**

Subsequent influence of the Adelaide model

Later in the 19th century these principles were espoused as a solution to the "evils" of the industrial revolution in Britain. Ebenezer Howard in proposing an ideal new town for Britain (Letchworth) posed his concept for "Garden Cities". Howard cited Light's Plan for Adelaide as unique in the world, and the primary physical and spatial model for new towns. It was the primary or ideal model for his garden cities.

In particular, Howard highlighted the Adelaide Park Lands (in his text which included illustrations) as established in the Adelaide plan as being essential to his model. It is noteworthy that the extent and distribution of acres between private land and common land for Letchworth, was almost identical to Lights Plan. Like Adelaide Letchworth today is a thriving city.

The New Towns Act (of Britain) was passed in 1946 and in the intervening years more than 30 new towns have been established and contained within designated areas all evolved from the Adelaide/Letchworth precedent.

Today, Lights plan for Adelaide is highly regarded and widely recognized as unique in the world. Its success and survival is by virtue of the containing common or park land and the associated economic policy. It is one of the top ten most liveable cities in the world.

The attending hazards of re- zoning the Park Lands

There is no doubt that the Park Lands have an extremely high inherent value. So long as South Australia's land valuation system is based on potential "highest and best use" regardless of planned purpose, private (and government) development interests will pressure to rezone common land to private and commercial use.

While the open space, parks, water bodies and associated landscapes generally depend on a far less invasive infrastructure than private development, private development generally requires highly intensive services and infrastructure.

These requirements are defined by established codes and standards. They relate in particular to vehicular access and parking (by the developer) impeding traffic control systems and intersections, fire separation requirements, and not least night-light and crime prevention in urban areas constraints. Pollution in the form of traffic, noise, light-spill and anything but park land peace will prevail by law. These are but a few of the “requirements” attending private development. Of course the footprint of any built form displaces park land and contradicts the Act. These and more will impact on ever-diminishing park land. Further, they will disrupt the intended sense of continuity of Adelaide’s unique belt of park land.

Flooding and Flood Mitigation

We are being increasingly exposed to extreme weather events - devastating deluges are becoming commonplace. As we build more hard surfaces, exponential increases in storm water run-off will significantly increase the risk of flooding to heavily populated areas of Adelaide.

The west side of metropolitan Adelaide has always been subject to flooding. Before settlement it was a swamp. William Light spoke of this danger when he resisted Governor Hindmarsh’s attempts to site Adelaide at the Port – a flood plain. He refused to site any part of Adelaide on the flood plain.

Nearly two hundred years ago the South Australian Commissioners realized the dangers of flooding when they drafted Light’s instructions “to reserve land along the water-courses” in case of flooding. Light expressed concern that to fit the specified 1000 acres on his chosen site, lower North Adelaide (along Melbourne Street) would have to be laid out on flood plain. We often note how East Terrace is stepped in plan to avoid the eastern flood plain.

The Park Lands were integral to Light’s interpretation of his flood-mitigation instructions.

In the 1930s the South Australian Government realized the inherent danger of the River Torrens in flood. They opened the River Torrens through the dunes to the sea and later built the Torrens Weir and the earth levees along the Torrens banks to the sea. They naively believed they had solved the problem.

Today, Henley, Grange, Lockleys, and their neighbouring suburbs are offered fragile protection by the Torrens levees. With increasing run-off from urban and city development, and an extreme event such as we all increasingly witness on the TV, the breaching of the levees and flooding of the western suburbs is inevitable.

In 2001 The Advertiser published (on the front page) a far sighted scheme submitted by Michael Harbison to build a new weir on the Torrens at the railway bridge. This proposal at a cost of less than \$80m would have almost doubled the capacity of the Torrens Lake and significantly increased Adelaide’s flood mitigation capability within the Park Lands. This scheme included reed-bed filtration along the western edge of the western Park Lands – a natural precaution against blue-green algae. The Adelaide city council and the State Government have repeatedly ignored the relevance of this proposal.

The imminent Park Lands rezoning proposal by the South Australian Government in the form of a code amendment will permit major hard buildings and land surfaces adjacent to and along the River Torrens. This, with commensurate loss of absorptive surfaces (landscape and Park Land) will exponentially generate un-manageable storm-water runoff.

The Government's park land re-zoning intentions fly in the face of the foresight of Adelaide's founders, and blatantly risk the safety of thousands of residents in the western suburbs.

The proposed zoning other than park land for development along the Torrens (or in fact anywhere within William Light's Park Lands, will stand in the way of our very unique if not life-saving saving flood mitigation opportunity which is the Park Lands.

The requirements and impacts of urban consolidation.

Over the past 20 years we have seen the increasing effects (positive and negative) of urban consolidation.

Urban consolidation is a sensible economic policy within reasonable social parameters. Certainly, urban consolidation makes more cost effective use of existing infrastructure and community services (in contrast to the development costs of new and ever-sprawling infrastructure with attending capital and life-cycle costs). There is precedent in Britain and Europe demonstrating how, while tightening valuable urban communities, urban consolidation saves valuable agricultural land for the production of food and provides for the maintenance of the essential open space.

We have seen how the Bentham/Wakefield urban consolidation policy for establishment of Adelaide ensured the economic and social foundation of our unique city.

As we continue to consolidate and densify our residential land we lose the 'quarter-acre block'. This is discussed by Hugh Stretton (*Ideas for Australian Cities 1969*). Stretton is not the only commentator to argue that densification of our city will require a substantial increase in public parks and open space (see for example the writings of Ray Pahl eg., *Patterns of Urban Life 1970*).

The inevitable outcome of urban consolidation is an increasing need for more park land. This is thoroughly documented elsewhere.

The residential capacity of Adelaide

When William light died in 1839 there were more than 10,000 people living in Adelaide inside the 2,300acres of surrounding park land. Most attended his funeral.

Prior to Stuart Hart's rezoning of Adelaide (*The Planning and Development Act, 1967*) there were about 45,000 people living in Adelaide within the Park Lands. Subsequently the population of the city within the Park Lands dropped below 10,000.

Adelaide's residential population is now on the increase and of the order of 15,000.

It is not inconceivable for Adelaide City to increase in population to well over 100,000 – even to 250,000. This is entirely tenable and would deliver high economic returns.

This increase in population while both growing the land economy and optimising infrastructure costs, will require significantly more open space close at hand for recreation – the lungs of the city. Adelaide as planned can handle this.

Urban consolidation is already leading to the sensible densification of inner-city areas (Unley, Brompton, Prospect, Walkerville, Norwood Kensington St Peters etc). The population of these areas is increasing by more than fourfold. This form of growth is taking up a significant proportion of former quarter-acre blocks, ie., residential land which once included private open space (the back yard).

As a result of urban consolidation and associated policies we urgently need to substantially increase the supply of immediately accessible park land to replace the loss of the 'back yard.'

So the Adelaide Park Lands need to increase in area rather than diminish in area.

Extension and influence of the Adelaide Park Lands idea

It is worth noting that the Adelaide/Wakefield/Light plan not only influenced the settlement of New Zealand but was also the model for the establishment of more than 350 park land towns in South Australia and Northern Territory. Many of these towns would not exist economically today but for the containment of the town acres by park land.

More recently urban developments in the UAE are turning to the Adelaide model, the Adelaide Park Land concept.

A noted international urban designer and landscape architect from Adelaide who has spent more than 30 years living and consulting in the UAE wrote:

“Adelaide is lauded world-wide for its Park Lands. Cities such as Riyadh and Dubai are endeavoring to link park land and rezone non park land to provide for parks that these cities currently miss.

Saudi's new city of Neom is placing itself entirely within Park Land, referencing Adelaide as an example of what to do.

It is extraordinary that as a most liveable city Adelaide will compromise its status by compromising its park lands.

Other Australian highly rated cities would love to see Adelaide knocked off its pedestal by that act alone.”

The impact of Rezoning Adelaide Park Lands

History has shown us that the existence of the Park Lands has given additional value to the town acres and ensured the City of Adelaide's land economy (see the above references). History has also shown us that the sale or rezoning of the Park Lands to private development has devalued the town acres (eg., Christchurch, NZ).

Long-term cost benefit analysis demonstrates that the return on rate revenue for Adelaide with the Park Lands far exceeds the return on rate revenue with the Park Lands lost to private and commercial development.

We know that the social benefits of open space tend to be intangible. Regardless, there is now more than 200 years of evidence world-wide to show the social, environmental and economic benefits of maintaining open space and park land in close proximity to city centres such as in Adelaide. The cost of maintaining this open space is easily off-set by the greater land value of the contained developed land (private or public).

It is already proven that the rezoning of the Adelaide Park Lands to private and public built development will ultimately result in a net devaluation of the existing private land (the town acres).

Available land for private development.

There is plenty of private land available for private development within the town acres. There are significant land holdings both throughout and on the fringe of the City of Adelaide available for development. The cost or value of the land is a reflection of the city as contained within the Park Lands. This land comes at a price and that is the price established by the existing land economy.

The densification of South Adelaide will continue, it will move south, Victoria Square will grow in civic pride and character, it is a work in progress.

The release of the Park Lands to private or public development can be justified by neither private development interests nor government opportunism. Economically, it will never be justified in the long term.

park land is not a land bank

Any idea that the Adelaide's Park Lands are a government held land bank is both fallacious and based on economic ignorance. It is akin to the actions of third world countries, believing they can print money whenever they need to stimulate their economy - their economic downfall is inevitable.

The idea that the South Australian Government believes it is charged to interfere with the Adelaide land economy through rezoning the Park Lands is of serious concern. It demonstrates that it is entirely unaware of the essential economic relationships between land use zoning and the land economy.

If the proposed rezoning proceeds, we will believe that this government is neither fit to manage our economy nor qualified to take charge of our land use planning.

Yet we know that the long-term impacts of its action in ignorance will be borne by others.

Heritage and Adelaide's Unique Character

Would the City of Manhattan permit the development of Central Park?

Would London give up Kew Gardens or Hyde Park or Hampstead Heath to private development?

Would the City of Paris allow private development of Jardin du Luxembourg or any of its variety of parks and gardens?

Would the Arabs of Al Ain give up their central-city date-garden leaseholds to private development?

These cities of permanence are comfortable with their established identity. They are confident in both their special characters and their unique distribution of open space. They understand the relevance of open space and the value of well-designed city buildings off-set and in contrast to superb public commons.

Adelaide does not need to ape the mistakes of Sydney, Melbourne, Brisbane or Christchurch.

Adelaide's Park Lands are not leftover space waiting for myopic opportunists to vandalise them.

Adelaide's (our) Park Lands are an integral component of a brilliant plan which is proven unique in the world. A plan which understands and provides for both economic and environmental values in concert.

In the interests of the future of a viable and liveable Adelaide, the proposed rezoning of the Park Lands by a code amendment is both entirely untenable and invalid.

Just like Mark Twain in his tribute to Adelaide in 1916, Peter Garrett, the former Federal Minister for Environment, Heritage and the Arts noted "I had the privilege of adding the Adelaide Park Lands and City Layout to the National Heritage List and these are one of Australia's greatest examples of planning heritage." It is the City within a continuous belt of Park Lands that makes Adelaide unique amongst Australia's capital cities.

And of course, we know that Adelaide as planned with integral park lands is "unique in the world" and seriously coveted by many others.

Sincerely

Rob Cheesman



THE SOUTH AUSTRALIAN ADVERTISER, MONDAY, NOVEMBER 12, 1877. (page 6, columns E2, F1)

PARK LANDS AND GOVERNMENT RESERVES

TO THE EDITOR

Sir - A discussion has lately been initiated as to the power of the Government to resume portions of the Park Lands for building purposes, and to alter or lay out new roads across the same.

As regards opening up new roads I readily admit that the progress of settlement of the country round Adelaide has rendered necessary (and will again do so) the opening up of new lines of road across the Park Lands in directions not contemplated or laid out by Colonel Light, but think the Corporation, as representing the citizens, and not the Government, should be the body to decide all such questions.

The power of the Government to resume any portion of the Park Lands for Government purposes is, however, a very different question; and on behalf of the citizens generally, and more particularly on behalf of the old colonists present at the selection and sale of the town acres in March, 1837, I deny the right of the Government to interfere with or make use of any portion of the Park Lands not specifically reserved or set apart for Government purposes by Colonel Light, and so described on his original plan of the city. I may I think be excused for claiming to speak as an authority on this subject because of my official position as next to Colonel Light on the survey staff gave me the best opportunity of knowing every detail of his plans, as well as its being my duty to see that his instructions were properly carried out.

Colonel Light's original plan of the city exhibited at the selection and sale of the town acres in March, 1837, showed the city divided into two blocks - that to the south of the river comprising 700 acres, while that to the north comprised 343 acres - surrounded on all sides by a large area of vacant land, which Colonel Light, in pursuance of his instructions and with the sanction of the Resident Commissioner, the late Sir James Hurtle Fisher, described as parks, to be reserved from sale, and dedicated as Park Lands for the use and recreation of the citizens, with exception of nine blocks of land thereon delineated, and which were stated to be reserved out of the Park Lands for various Government buildings or other purposes, the use for which each such block was reserved being in each case printed thereon.

I may add that the outer boundaries of the Park Lands were not then definitely fixed, only roughly sketched in; but as the survey of the country sections proceeded they were marked on the ground, as may be seen on reference to the original map of Districts A and B, and which also shows the numbers and position of the nine Government reserves. The plots thus referred to are as follows:-

No. 1. Government House Reserve.-This was shown on North-terrace, directly facing King William-street; but subsequently on proceeding to mark out the reserve it was seen that owing to the rapid fall of the western half of the ground it was not well adapted for building purposes. It was therefore thought advisable to remove the block a little to the more level ground on the east (the present site of the Government House), without, however, altering the area of the reserve. Had the

original site been adhered to, the present road and bridge leading to North Adelaide would not have been constructed.

No. 2. Barrack Reserve.-This was fixed between North-terrace and the river to the east of the Government House, being as near as may be to the site now occupied by the Police Barracks.

No. 3. Guard House Reserve.-A small block abutting on North-terrace, between the Government House and Barrack Reserve.

No. 4. Hospital Reserve.- situated near the intersections of North and East terraces; but when, under instructions from Colonel Gawler, that building was about to be erected, I pointed out to him that the situation was in a hollow, and suggested the advisability of altering the position to the higher ground on the north, and in accordance with my advice the Hospital was then built on the higher ground (sic). The building on the site thus changed now forms part of the Lunatic Asylum.

5. - Cemetery reserve, situated towards the south end of the West Park Lands, has not been interfered with. It is, however, much to be regretted that owing to the peculiar nature of the ground - land springs being found close to the surface - it is very unsuitable for a cemetery. A Select Committee of the House of Assembly took evidence on the subject some years back, and reported on the necessity of another site being selected, and the opinion of the public has since been often expressed in accordance with the report of the Committee. A late Government, I believe, took steps to purchase a new site, but from what I can learn the land so selected is not suitable. In my opinion the land to be selected should be naturally well-drained dry soil to a depth of not less than 10 feet, and free from rock; nor do I think there is any difficulty in making such a selection on the plains west of Adelaide a little south of the river and north of the line of the railway, the sub-soil of this part of the country being generally a light sandy earth, naturally dry, and retaining water not intersected by land springs.

6. Market-place Reserve. - Situated on West-terrace, opposite Franklin-street, where the Flagstaff and Keeper's cottage are now erected. The site for the Market has been changed to the west end of North-terrace, where the Cattle and Sheep Markets are now held.

7. Botanic Gardens Reserve. - Situated on the south bank of the Torrens and east of Thebarton, extending towards the Gaol. In this instance it has also been thought advisable to exchange the site to the east end of North-terrace, where the Garden is now so beautifully laid out and well managed.

8. Stores Reserve. - Under the hill at North Adelaide, where the iron stores and cottage of the Storekeeper, Mr. Thomas Gilbert, so well known to old colonists, were built, but after standing for many years were abandoned and taken to pieces.

9. School Reserve. - This was also on the North Adelaide Park Lands, a little to the east of the store on the western slope leading to Montefiore Hill, and has never been marked out or made any use of.

Having thus described the various sites reserved out of the Park Lands for Government purposes, and shown how far the original plan of Colonel Light has or has not

been adhered to, it appears to me to be desirable to point out the various instances in which the Government have encroached on the Park Lands without first seeking authority for doing so, leaving it with the public to consider how far it may be advisable to condone the irrecoverable past, or to take such steps as may from time to time be necessary to guard against the right of the citizens being again encroached on. I do not profess to give an accurate list of all the encroachments. Those occurring in my mind at this moment are as follows:- 1. Destitute Asylum - a mass of buildings of all ages, but which, including that now in the course of erection, are most certainly the reverse of ornamental and most unsuited to the locality; 2. Gunshed; 3. Magazine; 4. Stores; 5. Hospital; 6. Exhibition Building; 7. Printing Office; 8. Parliament Buildings; 9. Baths; 10. Rifle Butts; 11. Flagstaff and Cottage; 12. Observatory; 13. Gaol; 14. Slaughterhouse; and various gardens and cottages scattered about the Park Lands near the river.

A detailed history of some of these encroachments would be amusing, showing how from small beginnings the insignificant hut of the squatter, by adding a piece here and squaring a corner there, has gradually grown into a building of respectable dimensions. Much misapprehension prevails as to the relative position and powers of the Government and Corporation in the control and management of the Park Lands. The facts of the case may be summarized thus:- the Act of Parliament constituting the Corporation vests the management of the Park Lands in the Corporation (with the exception of a certain portion situated between North-terrace and the river), not, however, giving the Corporation any powers of alienation, and not in any way altering the purposes for which the Park Lands were in March, 1837, set apart and dedicated for the use and recreation of the citizens. The portion of the Park Lands not then placed in the control of the Corporation is not however, vested by the Acts in the Government; it simply leaves this portion of the Park Lands without attempting to alter the purpose to which it was dedicated or declaring who are to be regarded as trustees in the matter.

The large encroachment on North-terrace occupied by the railway has been made under sanction of an Act of Parliament - the only legal means by which any portion of the Park Lands can be resumed or changed from the original purpose to which they were dedicated, namely, for the use and recreation of the citizens.

I am, however, inclined to think that even in this matter the railway authorities have at various times taken possession of more land than they are legally entitled to, and think it would be as well that this matter should be carefully attended to, more particularly by those who live in the immediate neighbourhood, whose property can be hardly said to be improved by the style of building adopted by the railway authorities.

I am, Sir, &c.,

G. S. KINGSTON.

Adelaide, November 9, 1877.









Rob Younger

Please see email below.

Rob Younger

Begin forwarded message:

From: Rob Younger [REDACTED]
Date: 26 October 2021 at 4:42:47 pm ACDT
To: plansasubmissions@sagov.au
Subject: Submission Riverbank Precinct Code Amendment

To whom it concerns

I reject the re-zoning of any part of The Adelaide Parklands.

Re zoning parks changes for ever their intended use as open green public spaces.
Having parklands surrounding the city and Nth Adelaide is unique to Adelaide and should be
cherished .. not developed into something else.

Many area of the parklands have been lost to development over the years.
More rezoning and development is unacceptable.. eventually there will be nothing left if it continues
to go this way.
Yours sincerely.

Rob Younger.

Robbie Porter

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Robbie

Family name: Porter

Organisation: ACC ratepayer

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: HANDS OFF the Riverbank. ABSOLUTELY OUTRAGEOUS to even think of doing this. We need the Riverbank to stay as it is. Whose bright idea was this? We DO NOT NEED any more high rise buildings in this area. The building between Parliament House & The Festival Theatre will be an eyesore for years to come, with shadows on the plaza and a wind draft effect, so the same things will happen on the riverbank. We need to retain our green space, or even make more available, so BACK OFF on this idea.

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Attachment 3: No file uploaded

Attachment 4: No file uploaded

Attachment 5: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Robert Bartsch

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: robert

Family name: bartsch

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Do not agree with this proposed development. It will look awfull in that enviroment. Where are all the cars going to be parked?? How is development going to be affordable- get a grip.

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Attachment 3: No file uploaded

Attachment 4: No file uploaded

Attachment 5: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Robert Bauze

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Robert

Family name: Bauze

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The decision to have a health/medical precinct having been made should proceed to completion with the building of the new WCH but the area proposed seems much larger than required - larger than the new RAH. The proposed new Riverbank Zone is an attack on the Adelaide Parklands which is shameful and should be abandoned. Expanding the area to include an arena takes away part of our heritage for which Adelaide is famous. If it was something that would bring hundreds of thousands of interstate or overseas tourists it might be acceptable - but I doubt that it would. Our Oval, even with attached hotel, could not attract any major or even half major sporting events in this COVID year. The north side of the river remains an attractive sight and, again, is part of what Adelaide is famous for. Bars and cafes and similar experiences would add nothing and be an eyesore. If Peggy Guggenheim were to offer a Museum of Art for a riverbank site, that might be different as we would join Bilbao and Venice and draw further attention to Adelaide as a city of culture and beauty. I think there was once a failed search for a Southern Hemisphere site? We shouldn't destroy our heritage unless there's a major addition to our character. Views and panoramas are important. -The location of the factory-looking RAH facing West Terrace, which blocks a view of the parklands on the drive north along the Terrace is an example of poor planning. - Another is the black of the windows of Adelaide Health and Medical Sciences Building as seen from Hill St. North Adelaide. Black for medical?? Let's not have more.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Robert Farnan

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: robert

Family name: farnan

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I can find absolutely no reason why our parklands should be diminished further as Adelaide is already the most park-poor of any Australian capital, with only 10% of our metro area parkland, see <https://www.foreground.com.au/parks-places/garden-cities-no-australias-leafy-urban-centres-pressure/> Re the carpark for the projected Childrens' Hospital, many cities build over their railway lines, and this could have the additional advantage of providing a pedestrian over the railway To the river. Any substantial re-purposing of the parklands should involve a plebiscite requiring a substantial majority, perhaps even 70%, for, as this is a serious issue given that they are a nearly 200 year treasure held in our trust, not something for a political party with a temporary life span to gift away.

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sent to
proponent email: plansasubmissions@sa.gov.au

Robert Pontifex AM

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Robert

Family name: Pontifex AM

Organisation: Retired

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please just leave to Adelaide Parklands alone ... why would anyone want to spoil our city any further than the govt and the council already have ??

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email: plansasubmissions@sa.gov.au

Robert Prowse

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Robert

Family name: Prowse

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am concerned about the proposal to amend the code. I only heard about the proposal this week and have not had time to examine details such as the zones in any depth. However, I am concerned: That power is being taken from the ACC, which is in better position to represent the views of its ratepayers. That the changes will result in over-building of the riverbank precinct, especially in Pinky Flat. We are not Melbourne and providing a natural landscape across the Torrens Weir provides a refreshing contrast to the heavily built Southbank and similar watersides in other large Australian cities. In general, any building on the parklands overall should be undertaken only for special reasons and with the general agreement of the Adelaide Community. Any building should take place very gradually, giving time to assess the effect of the change. The major concomitant changes in this amendment are likely to preclude a considered approach. I do accept the building of the W&C Hospital as part of the biomedical precinct, but suggest that following completion of the Bragg building and the WCH, the site is probably essentially full and that further expansion should occur south of North Terrace. Additionally, I am concerned at the suggestion that the ACH will have a carpark on vacant parkland is an inappropriate use and that the new hospital should have an underground carpark like the current RAH. The extra cost would be appropriate if parkland is preserved. I am not in favour of another arena being built on Parklands; there are enough sporting venues on the parklands and other parts of the city would benefit from being the site of a new arena, or indeed a concert hall, which is perhaps a more pressing need than the arena.

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proponent email: plansasubmissions@sa.gov.au

Robert Riggs

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: robert

Family name: riggs

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: There are an excess of food and drink vendors in the CBD that at this point in time are very much in need of customers. The whole purpose of the the footbridge was to enable visitors to the oval to gain quick an easy access to the CBD. A vibrant CBD is a vital cog in the feel of the City and this is where Governments push should be without expanding to Pinky flat that is a very tranquil River Torrens precinct. I am very disappointed with the recent encroachment of the parklands disregarding what is now mooted . The parklands are just that and we will live for many years with the already overbuilt sections. For Government to allow the Lange Walker and the new casino development to happen that now hides the heritage precinct of the railway station and Parliament house is shamefull. Yes Adelaide needs to be different but it is already, but further building on the parklands will only destroy what we have. Lot 14 is being overdeveloped and is an example of what was initially promised has been overridden by greed for commercialisation.

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proponent plansasubmissions@sa.gov.au
email:

Robert Wishart

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Robert

Family name: Wishart

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do not agree to these proposed rezoning amendments nor too any further development in the parklands and in particular this River Torrens area of the parklands. More green open space is needed in this area not less and if any area is underutilised then it can be rejuvenated rather than be build on. The parklands and open space have to be retained for our future generations and these proposed changes put this at risk.

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proponent email: plansasubmissions@sa.gov.au

Robin Donaldson

ADELAIDE RIVERBANK PRECINCT CODE AMENDMENT, or PROPOSED REZONING

I reject the Government's 'Vision' for the Riverbank Precinct of the Adelaide Parklands.

This proposal is outrageous.

The Adelaide Parklands are Nationally heritage listed and there is a proposal to seek World Heritage listing. Adelaide is the only city in the world INSIDE a continuous sweep of parklands. The listing will certainly not be granted if this rezoning eventuates. A World Heritage listing will bring kudos and has high tourism potential - more than cookie cutter high rise buildings, shops and commercial developments on the River Torrens frontage.

Why build a new stadium when that money could be spent on a suitable upgrade to the Entertainment Centre which is served by existing public transport and carpark?

Why not rebuild the Women's and Children's Hospital on its current site? Hospitals overseas are upgraded on existing sites whilst the existing hospital is still in use. Or, build it across the road from the RAH - behind the old Newmarket Hotel.

Why build shops, bars, night clubs, child care centre(s), and offices on either side of the River Torrens anywhere between Hackney Road and west of Morphett Street when there is plenty of space within the existing CBD footprint that should cease at North Terrace?

Look to Lot 14 for further Innovation and Cultural developments.

OPEN GREEN PUBLIC spaces do not need rezoning. Open natural public spaces are the lungs surrounding the CBD. How ironic that Green Adelaide has been formed to encourage maintaining existing, and planting extra trees to assist with climate change management and this current proposal to rezone the Riverbank precinct will erode the existing coverage of trees and greenery we need.

What a legacy this Government and bureaucracy will leave for future generations if this proposal eventuates!

Once rezoned there will be NO future public notification rights.

Please, DO NOT rezone the Riverbank Precinct.

Robin Donaldson

████████████████████

██████████

████████████████████

Robyn Byrne

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

In this time of counting, nay bearing the cost of human activity on natural spaces and places, how dare you.

Roderick Lovibond

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Roderick

Family name: Lovibond

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I oppose the proposed construction of a multi-story carpark (for the new WCH) immediately in front of the old Adelaide Gaol. This carpark would effectively isolate the heritage listed Adelaide Gaol, and reduce visitor numbers as well as being unsightly. I do not support rezoning parklands to build a carpark.

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proponent plansasubmissions@sa.gov.au
email:

Rodney deHoedt

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Rodney

Family name: deHoedt

Organisation: Volunteer

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: A better plan, would include a new, World Class Gallery Building for Modern Art. Great Galleries of the world become magnets for overseas tourist dollars. These are much better than sports stadiums, which tend to have massive crowds attending sports events because they of necessity happen over a short few hours. This causes congestion problems when built in city locations. Most attending the sports events will be locals with little extra money being attracted from overseas tourists. By comparison, great galleries, in addition to being open every day, hold several major exhibitions per year, lasting for weeks or months, which attract overseas and interstate people who spend more money during their stay. Hotels, restaurants, cafes, tour operators and retailers all benefit. The key is to build a Gallery, within our North Terrace Cultural Precinct, that in addition to holding great exhibitions, is an Iconic and impressive structure that attracts admiration and attention world wide. Our existing Gallery has a huge stored collection, which then could be better utilized. The two galleries working together could help make Adelaide a more likely choice for those overseas tourist dollars, all year round.

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Roma Schiller

I reject the re-zoning of any part of the Adelaide Park Lands.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please, please don't destroy our unique city parklands !

Yours Sincerely

Roma Schiller

████████████████████

████████████████

Rosanna Taylor

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Rosemary Coates

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Rosemary

Family name: Coates

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Do not take away even more of the green belt and the history of Adelaide. We are a UNIQUE CITY because we value our history..we value our green spaces. We have something other cities don't have.. accessible park locations.. open spaces and history all within walking distance. We don't need to become a copy of other cities. We need to remain unique. People come her BECAUSE we are not the same as everywhere else. They come here because of our history, culture, accessibility.. they don't come here to pretend to be in another city..

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Rosemary Hallam

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Rosemary

Family name: Hallam

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The parklands which surround the Adelaide CBD and the five squares within the CBD are in my opinion the city's greatest asset. The ability to easily connect with the natural environment so close to the CBD sets Adelaide apart from other capital cities, and contributes to the health and wellbeing of those who work and live in the city. The rezoning of parts of the Adelaide Park Lands Zone to City Riverbank Zone (entertainment subzone), allowing cafes and shops to build on these areas, threatens the ability of citizens to relax in a natural, tranquil setting. From personal experience I have found it invigorating to be able to relax by the River Torrens on a lunch break. The riverbank is also popular with walkers and joggers, who benefit from the natural surrounds. If cafes/shops were present this would completely change the atmosphere, reduce the appeal for joggers, and reduce available public space for non-patrons to sit and relax away from man-made structures and mechanical noise. I do not find this acceptable and strongly object to the rezoning. I further object to the rezoning of parts of the Adelaide Park Lands Zone to City Riverbank Zone (Entertainment Subzone). These areas are popular for recreation and their replacement with an arena reduces public amenity. Regarding the proposed Innovation Zone adjacent the Adelaide Botanic Gardens, it is indeed important to maintain the open space link from Frome Road to the Adelaide Botanic Gardens. As such, I believe it is appropriate to leave the link itself within the Adelaide Park Lands Zone, rezoning only the high school itself.

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proponent
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Rosemary Luke

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Rosemary

Family name: Luke

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I believe that the riverbank land between King William Road and the Morphett Street bridges, on the southern side of the river only, should be activated with both permanent and pop-up cafes to service the Festival Centre and Convention Centre precinct. I am strongly opposed to any built development on the northern side of the river, whether east or west of King William Road. These areas MUST be retained as Parklands. I do not support the development of an arena on the Parkland on the western side of Morphett Street and I do not support any built development on either side of the river west of Morphett Street,

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Rosina Possingham

Attention: Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department

Riverbank Precinct Code Amendment

Hi, please do not take our park lands away.

Thanks, Rosina Possingham

Roslyn Islip

To all State Politicians

I strongly oppose any plan to reduce the area of the Adelaide Parklands, I can not believe that you could even consider it.

The Parklands provide open space for city residents and workers and are the lungs of Adelaide

Please protect this unique area

Yours sincerely

Roslyn Islip



Unley

SA 5061

Rupa3

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Russell Finney

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Russell

Family name: Finney

Organisation: Hospitality and associated recreational consultant and professional

Email address [REDACTED]

Phone number: [REDACTED]

Comments: There has been insufficient business modeling presented to the public on what mid to longer-term benefits (cultural and ROI) this facility will bring to the community. This venture could well mirror the same model and fate of CBD motorsport and the entertainment center - insufficient events & population to provide a sustainable ROI resulting in ticket prices which the community cannot afford and ongoing operating costs (another burden to the taxpayer) excessive to a commercially viable life-cycle. What is the anticipated frequency of use V's the forecast cost of tickets to events? "There's no kudos or community benefit in "owning the biggest fridge in the neighborhood if you can't fill it with food" (products available/have the funds to stock it) Apart from employment offered during construction what are the real benefits to the ongoing employment crisis in SA? These venues are typically managed by a skeleton crew of 5-10 pax and only serve the casual workforce - are there better projects that provide sustainable full-time employment? Seems to me and most, this is a SA government grandiose plan to be funded by the already overtaxed residents clearly timed (and assumed) to garner votes in the upcoming election.

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proponent email: plansasubmissions@sa.gov.au

Russell Sayers

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Russell

Family name: Sayers

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I'm more than happy with this proposal, particularly in relation to the rezoning of land west of the Royal Adelaide Hospital to support the development of the new Women's and Children's Hospital. This is clearly not parklands in the true sense of the word (nor a functioning olive grove) and the re-zoning for health purposes is a worthy cause for the benefit of the SA community.

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Russell Talbot

I am outraged and absolutely appalled at the proposed the re-zoning of part of the Adelaide Park Lands. How ***DARE*** you?! You are stewards, not owners, not even custodians. There is a well-known Native American saying, "We do not inherit the Earth from our ancestors, we borrow it from our children." The parklands are borrowed from our children. Please adjust your egos to that perspective.

Yours very sincerely,
Russell Talbot
26a Wheaton Rd Plympton

--

This email has been checked for viruses by Avast antivirus software.
<https://www.avast.com/antivirus>

Ruth Russell

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ruth

Family name: Russell

Organisation: WILPF SA Branch

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: All these proposals that have been listed go against the whole principle of retaining our precious parklands for recreation, breathing space and nature in the centre of a city. Our parklands are not up for development of any kind. I walk through them regularly and see so many people enjoying the park, playing games, watching the birds, walking their dogs and enjoying nature. The parklands are NOT for development, they are the lungs and pride of our city. NO DEVELOPMENT EVER.

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proponent email: plansasubmissions@sa.gov.au

Ruth Sims

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Ruth

Family name: Sims

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I'm concerned that open and truly public space and access be maintained. I am particularly concerned about any large scale development, such as a sporting arena.

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proponent email: plansasubmissions@sa.gov.au

Ruth Zanker

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: ruth

Family name: zanker

Organisation: public

Email address: [REDACTED]

Phone number [REDACTED]

Comments: We have a world heritage girdle of parklands gifted to us by our forebears from the vision of Colonel Light. We have an imperative to hand this on to our children and grandchildren who do not have a voice at the moment of threat.

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proponent plansasubmissions@sa.gov.au
email:

Sally & Alistair McHenry

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: sally and alistair

Family name: McHenry

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: My husband and I are totally opposed to the proposed rezoning of the parklands , particularly along the Torrens Riverfront Precinct. The genius of our city planners in providing us with a green belt to surround our city is even more prescient in the 21st century as temperatures rise and heat stress becomes a health problem for us all in Adelaide. With climate change now threatening our very survival the green and tree canopy of our beloved parklands is even more important than ever. The Adelaide Parklands are what makes Adelaide unique and the envy of people around the world. Why would your government consider destroying something so precious , something that we have managed and preserved for nearly 2 centuries. Shame on you all. Do Not proceed with this legislation.

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proponent email: plansasubmissions@sa.gov.au

Sally Armstrong

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: sally

Family name: armstrong

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This is a major redevelopment and change of land use, the scale is too big. We lose too much natural environment. Adelaides character is compromised, my vision of Adelaide happily embraces old world charm and green grass. We are not Melbourne with the Yarra. We certainly do not need a second stadium with all the development and construction involved. Why not fix the Adelaide Aquatics Centre instead? Use of The area near the Botanic High School should be discussed by many many more people before any plans are put forward. Please stop destroying the natural environment that Adelaidians find priceless.

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Sally McLean

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Sally

Family name: Mclean

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I think the Precinct should be free of permanent buildings of all sorts. They are excluding, and by their structure change the feeling, and even climate of the precinct. An example. The wind that howls down North Terrace West among the new high rise buildings makes it a horrid place to be on foot. This Precinct should be for all people of the state and any need for food, beverages can be catered for by vans and pop ups.

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Sally Northwood

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Sally Northwood

Saloni Gadhia

To whom it may concern,

I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Thanks.

Kind regards,
Saloni Gadhia

Sam Harris

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: sam

Family name: Harris

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Development or rezoning of the Adelaide River precinct should not be allowed. Adelaide being surrounded by parklands is unique and part of Adelaide's identity. To rezone or develop the parklands will destroy the character of our city. Destruction of our parklands is not needed and any proposal to reduce our open green spaces is a desperate cash grab. Any rezoning of parklands should not be allowed to occur.

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proponent email: plansasubmissions@sa.gov.au

Samantha Buxton Stewart

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Samantha

Family name: Buxton Stewart

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: At a time when we actually need more green space, nature, canopy cover and biodiversity, selling off land is just a completely ridiculous suggestion. Trees are being removed at a rapid rate since the Development and Planning laws changed a year or so ago, and these changes will only encourage that the happen in the parkland space. You cannot offset or replace existing green space. Old trees take over 100 years to get to an age to support hollows for wildlife, and the wildlife won't survive long enough to see those hollows form if you remove existing old trees. Our parklands belong to us all and are what makes Adelaide a unique and beautiful city that people want to visit. How will we become a National Park City if there is nothing left, how will we continue to be Green Adelaide if all we have is a carpark and a bloody casino! Shame on any minister who tries to slide new laws to remove our natural spaces. I do not support these changes, nor my family, friends and colleagues.

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proponent plansasubmissions@sa.gov.au
email:

Samuel Pring

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Samuel

Family name: Pring

Organisation:

Email address:

Phone number:

Comments:

I am in high hopes that the Old Adelaide Gaol will not be affected by the news of amendments in the area. The Old Adelaide Gaol, means a lot to South Australia and is not only an important part of our history but also invites healthy tourism into the state. The Old Adelaide Gaol will play an exciting role post COVID -19 era in which members can travel freely about the country. The historical site offers an incentive to learn about our interesting history when people are here on visit and also offers travellers something just a little bit more to and see on top of everything we already have.

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Samuel Wittwer

"I reject the re-zoning of any part of the Adelaide Park Lands.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kind Regards,

Samuel Wittwer

██████████

██████████████████

Sandra Hilbert

It is totally wrong to rezone this area you will be impacting on our heritage buildings and our future generations , our history will be lost when will you stop is the Botanical gardens next please re think this as I think it's appalling. Yours sincerely Sandra Hilbert moonta mines .home of Elizabeth Woolcock last woman to be hung in Adelaide jail.

Sandra Turner

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Sandra

Family name: Turner

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: This is outrageous and unnecessary especially considering that this beautiful green belt is unique. We owe it to future generations to maintain this area and not destroy it.

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Attachment 5: No file uploaded

sent to
proponent email: plansasubmissions@sa.gov.au

Sarah Kroemer

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Sarah

Family name: Kroemer

Organisation:

Email address:

[REDACTED]

Phone number:

[REDACTED]

Comments: Please leave our parkland as parkland. Do not put buildings there or make areas private.

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sent to proponent
email:

plansasubmissions@sa.gov.au

Sarah Schmidt

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards,

Sarah Schmidt

Sarah Tyson

Please DO NOT rezone any parkland for development. It is park land and must remain as a park.

The only work to do here is to restore it to natural state. With natural vegetation, natural waterways and natural fauna.

Please take your cement elsewhere.

Shane Potter

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Shane

Family name: Potter

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: We need to be extremely careful that there are distinct parameters in re zoning. This means that sites like the Old Adelaide Gaol are protected and untouched by developers. The unique history of our Gaol is an important part of the story of South Australia and therefore should only be "touched: in order to better preserve this history. No demolition or encroachment of the site should be allowed. This site belongs to the people of South Australia and not "developers" or the latest political agenda. Once these things are lost, they are lost forever. As someone who's family have been here since 1838 and who has a great Uncle who worked as a guard at the Gaol from 1899 to 1920 I would be devastated if this heritage was lost!

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sent to
proponent email: plansasubmissions@sa.gov.au

Shane Sody

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Shane

Family name: Sody

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I do not support any of the proposed re-zoning changes within the Adelaide Park Lands. Each one of the proposed changes is intended to allow development by that would be inconsistent with a Park. Parks are valued for their character as Open Green and Public. Developments such as a hospital, a car park, an arena, shops, offices, hotels etc do not belong in a Park. This proposed rezoning would wreak devastation on the world-unique Adelaide Park Lands.

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sent to
proponent email: plansasubmissions@sa.gov.au

Shane Sody (Adelaide Park Lands Association)

Please find attached a submission from the Adelaide Park Lands Association

Shane Sody

President

Adelaide Park Lands Association.

www.adelaide-parklands.asn.au



Adelaide Park Lands Association

c/o BK Partners Pty Ltd
P.O. Box 4056
Norwood South
SA 5067
secretary@adelaide-parklands.asn.au

ABN 19 706 384 386

Chief Executive, Attorney-General's Department
plansasubmissions@sa.gov.au

Riverbank Precinct Code Amendment

The Adelaide Park Lands Association rejects the re-zoning of any part of the Adelaide Park Lands. If Parks were to be re-zoned for other purposes then they would lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

The Adelaide Park Lands Association endorses both of the attached two submissions made separately by:

- **Australia ICOMOS (PDF, 8 pages, 1.4 Mb)** and
- **Community Alliance SA (PDF, 9 pages, 387 Kb)**

Yours sincerely

Shane Sody, President

20 October 2021

www.adelaide-parklands.asn.au



Australia ICOMOS Secretariat
Faculty of Arts & Education
Deakin University
221 Burwood Highway
Burwood VIC 3125
ph: +61 3 9251 7131
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w: www.icomos.org/australia

Australia ICOMOS Position Paper on the Adelaide Park Lands and City Layout National Heritage Place including comments on the Riverbank Precinct Code Amendment 2021

12 October 2021

About Australia ICOMOS

ICOMOS – the International Council on Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an official Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 750 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia, which provides us with an exceptional opportunity to see best-practice internationally. We have a particular interest in Australia's World and National Heritage places.

Background to the Adelaide Park Lands and City Layout National Heritage Place, and the Riverbank Precinct Code Amendment 2021

This paper has been prepared to address a range of long-term issues with the effective protection and management of the Adelaide Park Lands and City Layout National Heritage place. It also provides a response to the current Riverbank Precinct Code Amendment (2021).

In 2008 the Adelaide Park Lands and City Layout was entered in the National Heritage List maintained under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Its National Heritage values include,

The Adelaide Park Lands and City Layout is a significant example of early colonial planning which has retained key elements of its historical layout for over one hundred and seventy years...

The Adelaide Plan... reflected new town planning conventions and contemporary ideas about the provision of common or reserved land for its aesthetic qualities, public health and recreation...

The key elements of the Plan remain substantially intact, including the layout of the two major city areas, separated by the meandering Torrens River, the enclosing Park Lands, the six town squares, the gardens and the grid pattern of major and minor roads.

The Park Lands, in particular, are significant for the longevity of protection and conservation and have high social value to South Australians who regard them as fundamental to the character and ambience of the city of Adelaide.

The national significance of the Adelaide Park Lands and City Layout lies in its design excellence. The Adelaide Plan is regarded as a masterwork of urban design, a grand example of colonial urban planning... Features within the Park Lands area included a hospital, Government House, a school, barracks, a store house, a market and a botanical garden and roads.

The tree planting designed and implemented since the 1850s and the subsequent collection of the Park Lands, particularly within the Adelaide Botanic Gardens are outstanding features. The enclosing Park Lands provide for health and recreation for the inhabitants while settling the city limits and preventing speculative land sales on the perimeter.

The emphasis on public health, amenity and aesthetic qualities through civic design and provision of public spaces were to have an influence on the Garden City Movement, one of the most significant urban planning initiatives of the twentieth century... (Adelaide Park Lands and City Layout, National Heritage place record 105758)

A copy of the full official values and boundary plan are provided at Appendix A.

Many National Heritage places have a conservation or heritage management plan prepared to guide the management and conservation of the place. The 2013-2018 review of the National Heritage List (Department of the Environment and Energy 2019) noted that the management arrangements in place for the National Heritage listing for the park lands were the “2009 Management Strategy and development plans”. However, neither the current “Adelaide Park Lands Management Strategy 2015-2025”, nor the current Planning and Design Code (based on the former Adelaide City Development Plan) appear to be consistent with National Heritage management principles. These documents were never prepared to specifically address the management of the park lands’ diverse National Heritage values.

The Planning and Design Code (the Code) came into effect in Adelaide in 2021, replacing all Development Plans. The Code has several overlays that provide policy for heritage and historic places and areas, including for State Heritage Places, State Heritage Areas, Local Heritage Places and Historic Areas. There is no overlay for National Heritage places to help achieve an integrated approach, and no provisions in the SA planning system to identify if works are within the boundary of a National Heritage place, or to consider potential impacts on National Heritage places.

In September 2019 the South Australian Heritage Council considered the potential listing of the “Adelaide Park Lands, Squares and City Layout” as a State Heritage Area (SHA). It is understood that Heritage Standards will be prepared under the Planning and Design Code for the proposed SHA.

The history of the original area of park lands is complex, especially along North Terrace, where a series of developments have taken place over time. These have included railway facilities, a university and institute of technology, and a hospital from the 19th and early 20th centuries. Later commercial, entertainment and sporting facilities have also been developed or re-developed, and more recently a new hospital constructed. A major high-rise building is to be built behind the Adelaide Festival Centre. It is noted that many of these facilities are outside of the National Heritage place, although within the Adelaide Park Lands Plan as defined under the *Adelaide Park Lands Act 2005*, and within the setting of the National Heritage place.

Overview of the Riverbank Precinct Code Amendment

This amendment is proposed for the following reasons,

The State Government’s progress on initiatives of State significance in the Riverbank precinct includes the development of the proposed new Women’s and Children’s Hospital (nWCH). These initiatives are part of the State Government’s wider vision for the Riverbank precinct as a premier health, sporting, entertainment, education, and cultural boulevard and have been the subject of ongoing strategic consideration. (Plan SA, Riverbank Precinct Code, Amendment, draft for consultation, 2021, p. 6).

The amendment partly relates to the National Heritage listed area, as well as other areas which are part of the Adelaide Park Lands Plan as defined under the *Adelaide Park Lands Act 2005*. The total area of park lands impacted by the amendment is approximately 70 hectares. The amendment will apparently enable several substantial developments within the National Heritage listed park lands boundary, including:

- a multi-storey carpark and access road for the proposed Women’s and Children’s Hospital;
- a major entertainment building;
- expansion of a commercial innovation precinct; and
- a range of community, cultural, tourism, shop and licensed premises located ‘on-water and off-water’ on the northern banks of the Karrowirra Parri/River Torrens.

These are the current proposals, and it seems likely additional future developments may arise which will be facilitated by the Code amendment, as new land uses include:

- arena;
- community centre;
- consulting room;
- convention centre;
- educational establishment;

- entertainment venue;
- helicopter landing facility;
- hospital;
- hotel;
- licensed premises;
- land division;
- light industry;
- office;
- pre-school;
- shop;
- serviced apartments; and
- tourist accommodation.

In terms of built form, the Code amendment will allow 15-20 storey buildings and 53-71 metre building heights.

The Code amendment will also allow for land subdivisions within the National Heritage place and public notification will no longer be required for any development application except the demolition of a State or Local Heritage Place.

Additionally, a number of current uses that support the National Heritage values will be removed by the proposed Code amendment. These include a range of open space, recreation and sporting activities, as well as special events.

Key General Overarching Issues for the Adelaide Park Lands and City Layout

The key issues affecting the park lands include:

- incremental and substantial development pressure within and adjacent to the National Heritage place, involving major developments in the past, current proposals and possible future developments that may have a cumulative adverse impact on the National Heritage values;
- the development of major buildings and roadways which erode the open and landscape qualities of the park lands, including the meaningful connectivity of the encircling park lands in the vicinity of Bonython Park, preclude the restoration of the park lands, impact on the grid layout, or which are unsympathetic in the setting of the park lands, any of which may adversely impact on the National Heritage values, including its social values; and
- the inclusion of uses which are not consistent with the general character of the park lands, or create an imbalance of uses which may affect the overall landscape character and the National Heritage values.

Of great concern is that the proposed Code amendment is only the latest example of development pressure on the park lands. There is no established carrying capacity for the park lands that defines the extent and character of sympathetic development, and such pressure will continue to arise over time.

It is understood that the proposed Code amendment may not be a matter (an action) that can be considered under the EPBC Act, which is focused on specific projects. In the latter case, the normal process involves undertaking a self-assessment (heritage impact assessment) of a particular action to determine if it is likely to have a "significant impact" on National Heritage values. The proponent determines if a referral under the EPBC Act is required.

An "action" is defined in the EPBC Act as: a project, a development, an undertaking, an activity or a series of activities, or an alteration of any of these things (section 523). Actions include, but are not limited to: construction, expansion, alteration or demolition of buildings, structures, infrastructure or facilities, earthworks and vegetation clearing. However, government authorisations for another person to take an action are not actions (section 524).

Additional concerns include:

- there is uncertainty in relation to the proposed approvals process following rezoning, noting the apparent overall lack of coherence between City planning, State planning legislation and policy,

and National Heritage considerations under the EPBC Act, and heritage impact assessment in relation to actions within the boundary of or impacting upon the setting of the National Heritage place and State Heritage Places;

- there is no conservation management plan for the National Heritage place, consistent with the National Heritage management principles and other requirements under the EPBC Act;
- there appear to be nine land managers for the park lands National Heritage place, it is unclear if they all have appropriate policies and processes to protect and manage the place, that they understand their obligations under the EPBC Act, and that these management systems provide for an integrated outcome; and
- heritage impact assessments for proposed works in or adjacent to the National Heritage place must be prepared by relevant heritage experts, they are not always publicly available, or available at an early stage to enable public scrutiny prior to development approval being granted.

Specific Additional Issues with regard to the Sub-Zones in the Code Amendment

Health Sub-Zone

- Potential adverse impacts on National Heritage park lands, and State Heritage Places or potential places (eg. the olive grove).
- Construction of multi-storey carpark on park lands/loss of or impacts on park lands landscape.
- Permits new building heights up to 15 storeys or 53 metres which would impact on park lands landscape.
- Proposed land uses are inconsistent with park lands landscape.

Entertainment Sub-Zone

- Construction of arena on park lands/loss of or impacts on park lands landscape.
- Permits new building heights up to 20 storeys or 71 metres which would impact on park lands landscape.
- Proposed land uses are inconsistent with park lands landscape.
- Adverse impacts on Colonel Light's grid layout, which is a key component of the National Heritage listing.

Riverbank Sub-Zone

- Potential impacts on Pinky Flat as a place of significance to the Kurna community.
- May lead to development on park lands/loss of or impacts on park lands landscape.
- Proposed land and water uses are inconsistent with park lands landscape.

Innovation Sub-Zone

- No valid reason has been offered for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone).
- May lead to development on park lands/loss of or impacts on park lands landscape.
- Proposed land uses are inconsistent with park lands landscape.
- Frome Park/Nellie Raminyemmerin Park cannot be disturbed as it contains a fully authenticated and documented Kurna Aboriginal burial site listed on the Register of Aboriginal Sites and Objects under the *Aboriginal Heritage Act 1988*. It also contains contaminated material to a depth of 1.5 metres.

Recommendations regarding the Future Protection and Management of the Adelaide Park Lands and City Layout

Given all of this context, Australia ICOMOS is opposed to implementation of the Code amendment while more fundamental issues need to be addressed. Accordingly, Australia ICOMOS makes the following recommendations.

1. The Code amendment process is deferred until a range of fundamental issues are addressed regarding the future protection and management of the park lands.
2. Kurna consultation is undertaken as part of any future proposed Code amendment affecting the Adelaide Park Lands.

3. An analysis be undertaken to establish the carrying capacity for the park lands which defines the extent and character of sympathetic development consistent with the protection of National Heritage values.
4. Consideration be given to undertaking a strategic assessment under the EPBC Act, as a higher level strategic planning process for the National Heritage place. This might include the carrying capacity analysis recommended above.
5. A review should be undertaken to establish how City, State and Commonwealth systems can achieve greater coherence in the protection and management of the National Heritage place, including with regard to heritage impact assessment. This would assist in identifying owner and proponent obligations under the EPBC Act.
6. Heritage impact assessments prepared by relevant heritage experts for proposed works in or adjacent to the National Heritage place should be prepared and made publicly available at an early stage to enable public scrutiny prior to development approval being granted.
7. A conservation management plan for the National Heritage place should be prepared, consistent with the National Heritage management principles and other requirements under the EPBC Act.
8. A system should be developed to ensure the integrated management of the National Heritage place amongst the various land managers within the area, and this should be documented in the conservation management plan.

Appendix A: Adelaide Park Lands and City Layout – National Heritage values and Boundaries

The Adelaide Park Lands and City Layout was included on the National Heritage List in 2008 and was found to meet six of the eight heritage criteria under the EPBC Regulations.

National Heritage Values

Criterion (a) the place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is the physical expression of the 1837 Adelaide Plan designed and laid out by Colonel William Light. It has endured as a recognisable historical layout for over 170 years retaining the key elements of the plan; encompassing the layout of the two major city areas separated by the Torrens River, the encircling Park Lands, the six town squares, and the grid pattern of major and minor roads. It is substantially intact and reflects Light's design intentions with high integrity.

The Adelaide Park Lands and City Layout is of outstanding importance because it signifies a turning point in the settlement of Australia. It was the first place in Australia to be planned and developed by free settlers, not as a penal settlement or military outpost. The colony of South Australia was established by incorporation as a commercial venture supported by the British Government, based on Edward Wakefield's theory of systematic colonisation. To be commercially successful, there needed to be contained settlement to avoid speculative land sales and this settlement needed to be designed and planned to attract free settlers and to provide them with security of land tenure. The city layout with its grid plan expedited the process of land survey enabling both rapid settlement of land and certainty of title. The wide streets, public squares and generous open spaces provided amenity and the surrounding park lands ensured a defined town boundary while still allowing for public institutional domains. These elements are discernable [sic] today.

The Adelaide Park Lands is also significant for the longevity of its protection and conservation. The Adelaide Municipal Corporation Act (1840) established the city council as the 'conservators' of the city and park lands. The establishment of the Park Lands Preservation Society in 1903, along with successive community organisations marks a continuing pattern in community support for safeguarding the significance of the Park Lands for the Adelaide community.

The Adelaide Plan was highly influential as a model for planning other towns in Australia and overseas. It is acknowledged by town planners and historians as a major influence on the Garden City Planning movement, one of the most important urban planning initiatives.

Criterion (b) the place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth-century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth-century park lands in Australia.

Criterion (d) the place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of: (i) a class of Australia's natural or cultural places; or (ii) a class of Australia's natural or cultural environments.

The Adelaide Park Lands and City Layout is an exemplar of a nineteenth-century planned urban centre. It demonstrates the principal characteristics of a nineteenth century city including a defined boundary, streets in a grid pattern, wide streets, public squares, spacious rectangular blocks and expansive public open space for commons and public domains. The expression of these features with their generous open space reflects the early theories and ideas of the Garden City movement of an

urban area set in publicly accessible open space with plantings, gardens, designed areas and open bushland.

Criterion (f) the place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.

Adelaide Park Lands and City Layout is regarded throughout Australia and the world as a masterwork of urban design. Elements of the Adelaide Plan that contribute to the design excellence are the use of the encircling park lands to define the boundary of the development of the city and to provide for health, public access, sport, recreation and public institutional domains, thereby meeting both economic and social requirements. Designing the city layout to respond to the topography was highly innovative for its time with the northern sections of the city located and angled to take advantage of the rising ground while retaining the Torrens River as a feature within the Park Lands. The judicious siting and wide streets maximised views and vistas through the city and Park Lands and from some locations to the Adelaide Hills. The plan features a hierarchy of road widths with a wide dimension to principal routes and terraces and alternating narrow and wide streets in the east-west direction. Light's planning innovation is supported by substantial historical documentation.

The formal organisation, delineation and dedication of the Park Lands space was a pioneering technical achievement of William Light in the Adelaide Plan.

The overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas, formal avenues, plantations, gardens, use of specimen trees, botanically important living plant collections particularly at the Adelaide Botanic Garden and the strategic placement of buildings and statuary in their settings.

The creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills. The civic design of Adelaide was used as a model for founding many other towns in Australia and New Zealand and it is cited in later seminal Garden City planning texts including 'Garden Cities of Tomorrow' by Ebenezer Howard.

Criterion G the place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

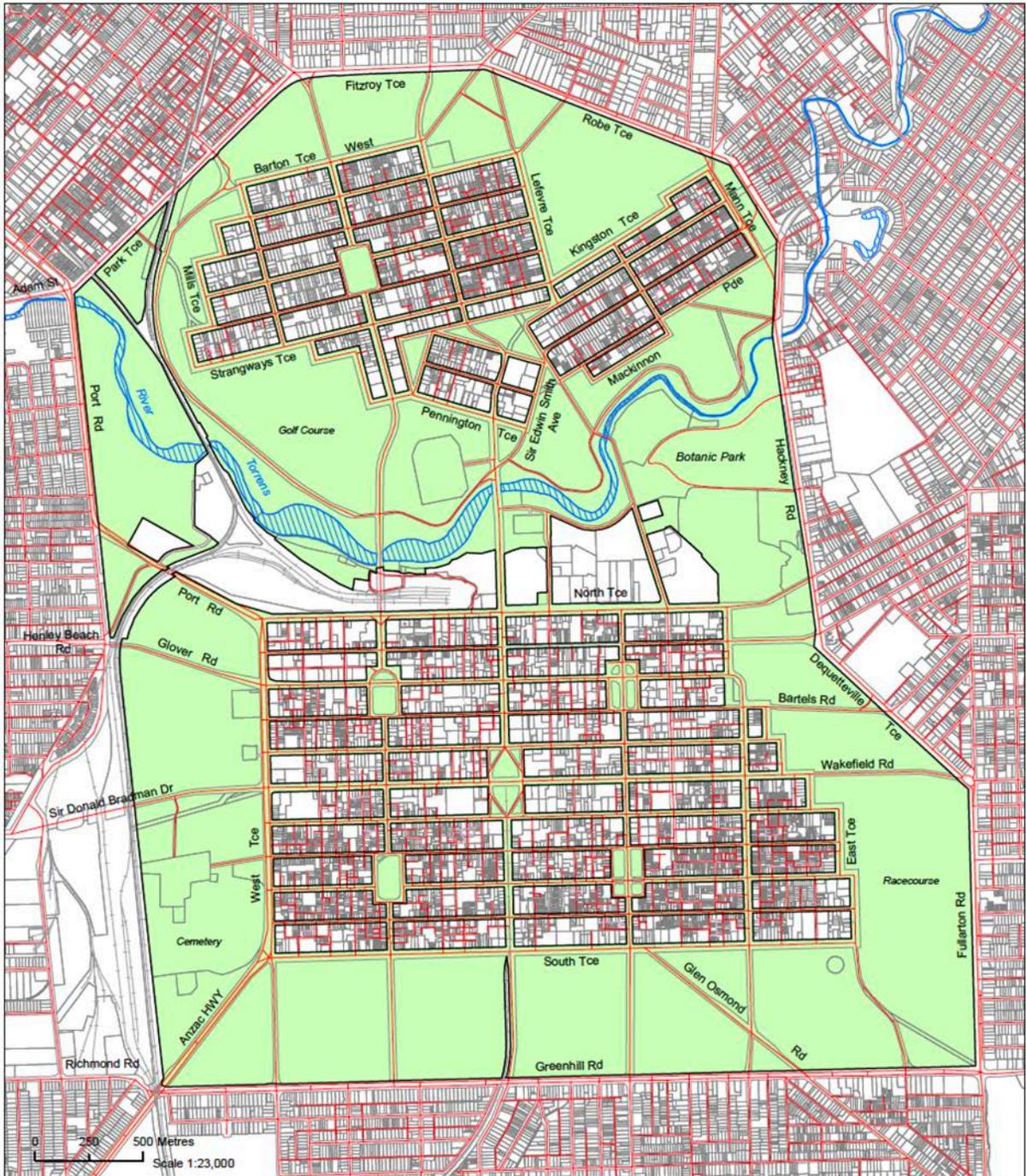
The Adelaide Park Lands has outstanding social value to South Australians who see it as fundamental to the character and ambience of the city. The Park Lands with their recreation areas, sports grounds, gardens and public facilities provide venues for individual and group activities and events, meetings and passive and active recreation. The Park Lands also have significant social value due to the range of important civic, public, and cultural assets and institutions within it.

The present Adelaide Parklands Preservation Society is the latest in a long history of community groups dedicated to protecting the Adelaide Park Lands. These have included the Park Lands Defence Association (1869-87), the Park Lands Preservation League (1903, 1948) and the National Trust of South Australia. The longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands is exceptional.

Criterion H the place has outstanding heritage value to the nation because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history.

Colonel William Light is most famously associated with the plan of Adelaide. He bore the ultimate responsibility, as recorded in his surviving publications and letters.

Boundary Map



<p>LEGEND</p> <p> Listed place</p> <p> Australian Government Department of the Environment, Water, Heritage and the Arts</p>	<p>The Adelaide Park Lands and City Layout</p> <p>National Heritage List</p> <p>Place ID: 105758 File: 3/03/001/0279</p>	<p>Data Sources: Cadastre for Australia (SA) - Cadlite RoadNet Comprehensive - Roads RoadNet Comprehensive - Railways © 2008 MapData Sciences Pty Ltd, PSMA Produced by: Heritage Division Canberra, GDA94, 7/11/2008 © Commonwealth of Australia, 2008.</p>
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Community Alliance SA Inc
PO Box 520
Goodwood, SA 5034
ABN: 56 505 508 381

Engaging for Reform



20TH October 2021

SUBMISSION BY CASA

RE:

Consultation: Riverbank Precinct Code Amendment
Period: 15 September to 27 October 2021

Feedback to:

https://plan.sa.gov.au/have_your_say/general_consultations/public_feedback_on_initiated_code_amendment?aid=Riverbank_Precinct_Code_Amendment

INTRODUCTION

The Community Alliance SA Inc. (CASA) was formed as an umbrella organisation for 25 resident action groups in South Australia. CASA was formed in 2011 following a number of controversial Ministerial Development Plan Amendments (DPAs) that caused widespread community concern. We advocate for our member groups, including lobbying for reform of government, planning and related legislation, and for genuine community engagement. Ten years on, we now represent 30 resident groups and growing. Ten years on, our economy, environment and communities are facing significant challenges that were unknown back in 2011 or 2016 when the Planning Development and Infrastructure Act was promulgated. SA now has a state wide planning system to replace local council based Development Plans. CASA's aims include to advocate for a sustainable and democratically based planning system, increase accountability and community confidence in decision making; defending the community's rights to informed participation in their system of government, and **protecting and safeguarding our heritage for future generations**. Our overall aim is to 'put people back into Government and Planning.

Please find our submission as follows:

CONSULTATION FEEDBACK

- The consultation relating to matters contained in the document Draft for consultation, Riverbank Precinct Code Amendment, Chief Executive, Attorney General's Department (approved 10/9/21) does not comply with the Community Engagement Charter as prescribed under the provisions of the Planning, Development and Infrastructure Act because the engagement is not well informed or sufficiently transparent.

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CASA Riverbank Code Amendment submission

- The consultation assumes high-level professional planning knowledge, which is unreasonable and has potential to alienate the ‘broader South Australian community’ and thus discourages some respondents from participating. Many members of the public have contacted CASA bewildered by the method of access to information on line, and confused by the complexity of the information.

The general public, despite the substantial documentation provided, find the portal access to the details difficult. There is also inability to comprehend that PlanSA’s fundamental proposals seek to replace existing desired planning outcomes for the Adelaide Park Lands Zone in the current Planning and Design Code with alternative desired planning outcomes for existing and re-zoned land on which major built form development is proposed. The content also disregards previous planning and concept reports and does not clarify on what basis the authority to propose changes relies.

- Although this consultation purports to encourage feedback that has potential to influence the outcome, in reality the scope is tightly restricted by PlanSA. Moreover, this restricted scope is not prominently highlighted.
- The ‘consultation’ is, in effect, an ‘information-only’ notification to the SA public that purports to be a ‘consultation’. This is a disingenuous, non-respectful process.
- It is evident that this code revision proposal is at a final draft stage, ready to quickly implement, and the suggestion that it is merely ‘a work in progress’ with no schedule indicates that the consultation is not genuine. The public consultation (‘engagement’) did not occur early enough to allow for feedback that might genuinely influence the proposed planning policy. CASA has issue with the fact that ‘stakeholders’ do not include a concurrent series of public information sessions when pre-consultation workshops were occurring,
- Insufficient information is presented about the content of the strategic reviews preceding this proposal, such as the Renewal SA and State Planning Commission investigations.

WHY DO WE HAVE PARK LANDS?

CASA rejects the Code Amendment in its lack of recognition of the cultural and historical relevance in retaining Park Lands for public use. This move to rezone riverbank areas as sub-zones is rejected. The subzones if adopted will take precedence over the underlying Adelaide Park Lands zone’s Desired Outcomes. The Code reflects an appalling attitude and approach by a state government entrusted with the custodianship of the protection of Adelaide Park Lands for our present and future generations, including all those within the community sharing a connection and public interest within its boundaries.

As stated by historian Patricia Sumerling in her introduction to ‘The Adelaide Park Lands- a social history;

‘ the Adelaide Park Lands are unique in Australia, with no known counterparts elsewhere in the world. They date from 1837, when the new town of Adelaide and its dormitory of North Adelaide - completely encircled by Park Lands, as Colonel William Light, the first Surveyor General intended – were surveyed. The uniqueness of the Adelaide Park Lands was recognised on 7 November 2008 when they received Australia’s highest heritage honour by being

included in the National Heritage List. The Park Lands surround the city in a green swathe of parks, gardens, ovals and sportsgrounds of approximately 931 hectares (2300 acres) with some acres of around half a kilometre wide swaddling the two parts of the city like a figure of eight. In all the city and the Park Lands comprise areas measuring 13 square kilometres (five square miles). Like a buffer one, the Park Lands separate the approximately 422 hectares (1042 acres) that make up the city from the sprawling metropolitan area...

Michael Williams, author of the *Making of the South Australian Landscape*, claimed the significance of the Adelaide plan lies not only in its unique character and formalisation of functional zones, but also in its use as a model for over two hundred towns and villages in Australia, and for several towns larger than these in New Zealand.¹

Over time the area of the Park Lands has reduced from 931 hectares to around 233 hectares with government and institutional buildings, rail terminal and conferences centres constructed along North Terrace. One main aspect of this process of civic change is the retention of open spaces in a linear manner both north and south of the River Torrens.

OVERVIEW OF DRAFT CODE AMENDMENT

The proposed rezoning will involve up to 70 hectares of Park Lands space. It includes

1. Four sub-zones vaguely titled generically with little detailed explanation.
2. Significant change in desired land uses, allowing a wide range of developments not currently contemplated by the Planning and Design Code. New proposed land uses include land division, light industry, accommodation, shops, high-rise buildings and other new land uses inconsistent with existing land uses contemplated by the Adelaide Park Lands Zone.
 - Large scale buildings on Pinky's Flat (Tarntanya Warna Park (Park 26).
 - Large multi-storey buildings or residential apartment buildings.(City Riverbank)
 - A large indoor Riverbank Arena in Helen Mayo Park (Park 27).
 - A multi-storey car park in Kate Cocks site (also Park 27)
 - A second hospital at the western end of the Royal Adelaide Hospital site which the hospital's Master Plan reserves as open space to strengthen the continuity of the Park Lands.
 - The transfer of Park Land areas into the state government's proposed new City Riverbank Zone will remove policies which protect the open, accessible landscaped character of the Adelaide Park Lands.
3. As the City Riverbank Zone envisages high-rise buildings, the transfer is totally at odds with the Adelaide Park Lands principles within the Code.

THE PROPOSED AMENDMENT IS CONTRARY TO THE CURRENT PLANNING AND DESIGN CODE PROVISIONS FOR THE ADELAIDE PARK LANDS ZONE.

The Desired Outcomes in the Code seek:

¹ Sumerling, P (2003) *The Adelaide Park Lands, a social history*. Wakefield Press, Adelaide SA p.ix-x

A unique publicly accessible and well connected open space system, including the formal city squares, that creates a distinctive landscaped park setting for the City of Adelaide

A range of passive and active recreational activities with a high level of amenity, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of temporary events, such as festivals, concerts and sporting events.

Comment: the above wording refers to the open space system, providing a range of passive and active recreational activities. The proposed land uses are not supportable, given that the current park lands are able to revert to a well connect dope n space system that is unique and publicly accessible.

Structure of the Amendment

The proposed sub-zones : The intent is that these sub-zones will negate current Planning and Design Code provisions for the Adelaide Park Lands Zone, and include

1.Riverbank Sub-zone.

The Code Amendment proposes:

- Rezoning land west of the Royal Adelaide Hospital from the Adelaide Park Lands Zone to City Riverbank Zone (Health Subzone) to support the development of the new Women’s and Children’s Hospital.
- Rezoning land west of Montefiore Rd from Adelaide Park Lands Zone to City Riverbank Zone (Entertainment Subzone) and a portion of land already in City Riverbank Zone from Health Subzone to Entertainment Subzone. This will support the development of entertainment- related uses, such as an arena.
- Rezoning land near and on which the Adelaide Botanic High School currently sits, from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone), to better reflect current use.
- Applying a new Riverbank Subzone in the Adelaide Park Lands Zone to the southern and northern side of the River Torrens in the location between Kintore Avenue and the Torrens Weir to accommodate appropriate small-scale development such as cafes and shops (both on-water and off-water) that contributes to the activation of the riverfront, in a way that protects the open landscaped character and heritage values of Elder Park.
- Policy changes to support connections and linkages throughout the precinct.
- Policy changes to support development of high quality and amenity.
- Introduction of a wide range of commercial uses, including high rise buildings, land division, shops, serviced apartments, licensed premises, community facilities, tourism accommodation.
- Attachment C is confusing to the layperson.

On closer examination, the extent and range of introduced developments are detrimental and fatal to the retention of what is recognised as a rare and beautiful town plan with its surrounding open woodland, ovals, sports fields and more formal gardens. The land uses and developments envisaged above are clearly at odds with the Objectives of the Park Lands Zone.

Specifically:

1 Riverbank subzone

The Riverbank sub-zone is already activated, with three cafes and two restaurants in the Precinct. The two restaurants overlook River Torrens/Karrawirra Pari. Pinky Flat hosts many large and small ephemeral events held in Elder Park, Pinky Flat itself, Barr Smith Walk, under existing planning conditions and revert to open park land areas when not in use. More of the same will not reduce the open landscaped character and heritage values of Elder Park.

2 Health Sub-zone.

This area includes the remaining Park Lands space between and on Kate Cocks Park (Park 27) and the Thebarton Police Barracks -west of the railyards to allow for a commercial multi-level car park for the new Women and Childrens Hospital. A height of up to 15 building levels is proposed but not detailed in this area. No additional guidance is provided regarding the transition in height from North Terrace developments on the river side of Terrace towards the western Park Lands. (The CWH Master Plan provides graphic images of the scale and setting of the proposed hospital and carparking Transit Hub but is not referenced in the Code Amendment.) For members of the public not able to access information sessions during business hours, there is insufficient information regarding the visual impact (and specific location) of the area taken up by access and parking, and vague references to the potential use of the two state listed heritage places.

Comment : The setting of the state-listed heritage Adelaide Gaol and the Thebarton Police Barracks should not be compromised by the proposed car parking 'transit hub' and its access ways. The area should be developed as a park setting retaining historic olive groves, a very tough and long lasting Mediterranean species and part of pioneer olive harvesting and food production. Park Land areas north and west of this sub-zone should be retained for passive and active recreation, and ephemeral entertainment events.

3 Entertainment Sub-zone.

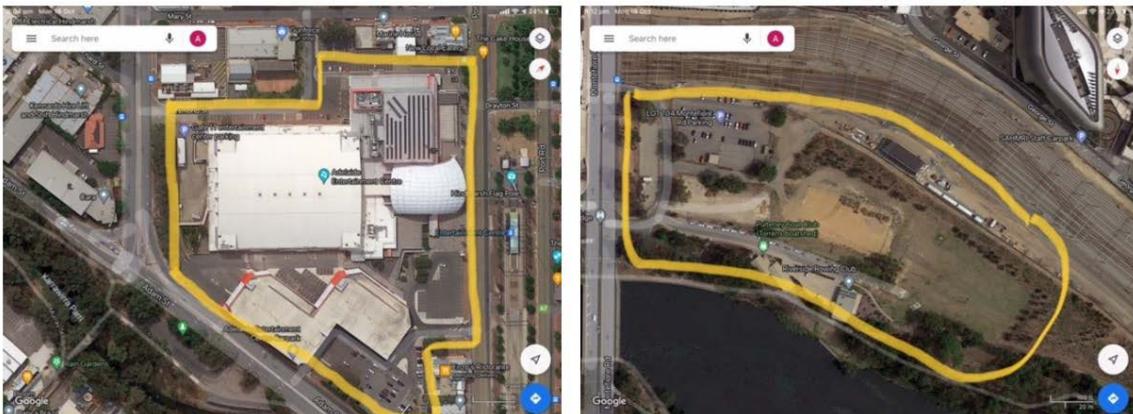
This sub-zone provides a height guidance of 20 building levels providing a 'transition in scale towards the river'. This sub-zone provides a height guidance of 20 building levels providing a 'transition in scale towards the river'. However, the proposed Adelaide Riverbank Arena illustration consultation material provides no such transition in scale down to the river on Helen Mayo Park (Park 27). Nor does the Code Amendment detail the fact that the Entertainment Centre, which is west of the Park Lands and well accessed by rail, tram and train links on Port Road 'replacement' may possibly result in demolition and housing development if the Arena goes ahead at the cost of \$660-700 million cost. There is no cost-benefit analysis of upgrading the existing Entertainment Centre versus the 'Arena' –essential

background information if the community can make informed comment. all relevant information on which to respond with their views of this Code amendment. This is a very poor trade-off and results in significant increase in the demand for parking close to a Park Lands venue. The proposed Arena is completely contrary to the intent of the Adelaide Park Lands Act, 2005 (refer to page 8).

The affected area currently provides a narrow stretch of treed parklands created from disused rail lands along the edge of the river. The continuity of the walkway through the existing trees on the site of the proposed , which includes a regular Kaurna heritage interpretation tour to access the western area south of the weir, is essential to show respect for Kaurna cultural events, and to provide a public walkway to the western park lands. It appears the pedestrian link’s amenity through riverside walk would be overcome by the bulk and scale development of the proposed stadium. Comments regarding the contamination of the railway site ignores the fact that Adelaide has landscape architects who have won numerous awards in beautifying public spaces, and remediation through design is quite possible.



[Announced in March 2021](#), the Adelaide Riverbank Arena would cost \$700 million to construct and would replace the ageing Adelaide Entertainment Centre.



Note: the image on the RHS indicates very little walkway space and the removal of mature trees worthy of retention and improvement.

However, the proposed new Arena content in the Code Amendment on exhibition provides no such transition in scale down to the river on Helen Mayo Park (Park 27). The park currently provides a narrow stretch of green parklands created from disused rail lands along the edge of the river.

The continuity of this naturally landscaped walking path, which is included in an educational and regular Kaurna heritage interpretation tour to the western area south of the weir, is essential to show respect for Kaurna cultural events, and to provide a public walkway to the western park lands. It appears the pedestrian link’s amenity through riverside walk would be

compromised by the siting of this large building almost on top of the lake, given its indicative bulk, height and scale.

Comment: Building the stadium in the location proposed is not supported for 2 reasons: It is further alienation of Park Land space and the overall costs are not provided. This is the sort of discussion that ‘stakeholders’ presumably have in rezoning and identifying suitable policies. It is also the type of information for genuine consultation with the community in the development of such policies.

3 Innovation Sub-zone.

Proposed:

The Code Amendment provides an opportunity for the new school and its curtilage to be better integrated with the nearby innovation precinct located at Lot Fourteen by being rezoned to City Riverbank Zone, Innovation Subzone consistent with this precinct.

The existing important open space link ‘Frome Park’ (located to the immediate south of the high school) between Frome Road and the Adelaide Botanic Gardens will be maintained through policy and identification on an updated concept plan that integrates the site with Lot Fourteen.

Notes: the area of the High School appears to have doubled, with no clear land use indicated but a number of land uses are proposed – more building replacing open space.

There are no details of an updated concept plan, nor any clear description of Desired Outcomes. Consequently there is insufficient information to provide informed comment and no indication that submissions will be considered in line with stakeholders’ contributions to influence policy.

The overall proposed Code amendment displays an ignorance of the traditional interests and connection with the riverbank area.

Frome Park/Nellie Raaminyemmerin between the new Botanic High School and the Lot 14 site, was reclaimed as Park Lands from an old car park. This area was remediated by the Adelaide City Council in the late 1990s and is owned by the ACC. The extension of the site area is proposed but is a highly significant site for the Kaurna People. The extension is strongly opposed for the following reasons:

1. This area is extensively contaminated and had to undergo remediation by burial and capping in order to meet the required standard applying to open space.
2. Under current regulations the site cannot be disturbed unless the whole of the contaminated material (which is about 1.5 M deep across most of the site) is removed to a regulated disposal site.
3. Additionally, the site contains a fully authenticated and documented Kaurna Aboriginal burial site; the human remains have been retained in place and capped. That has been recorded and protected, listed on the Register of Aboriginal Sites and Objects, Aboriginal Heritage Act 1988. Again, it cannot be disturbed.
4. Frome Park / Nellie Raminyemmerin allows the only access to the west side of the Botanic Garden, is used for WOMADELAIDE and other events.

5. No reason has been established for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Sub-zone).
6. The rezoning puts Frome Park at risk as a transition from open green space to an ancillary area for Lot Fourteen and Botanic High School.

CONCLUSION

CASA does not support the rationale for the Code Amendment, being contrary to the public interest and that the Minister for Planning reject this amendment because:

1. The Park Lands provide green and open space which is essential, for the people living in the city's high-density accommodation.
2. Considering the latest IPCC's predictions and warnings, the state government including Renewal SA, the State Planning Commission and the Liberal Cabinet is urged to heed the increased acceleration of Climate Change impacts on increasing temperatures, catastrophic weather events and public health.
3. Moreover, a whole of government approach is recommended to respond urgently to the public need to protect and value open space for its intrinsic benefits to biodiversity, human mental and physical well being.
4. World-best cities value open space for cultural and recreational purposes. New York's Central Park, Vienna's Ringstrasse Park, Paris's Tuilleries, London's Hyde Park, Hampstead Heath and Regent Park are valued for their aesthetic and environmental benefits of green and open space. Adelaide's Park Lands are unique and need to be protected for the same reasons.
5. The proposals are serious at variance with the 7 statutory principles of the Adelaide Park Lands Act 2005. (Note that the Act was prepared after the Adelaide Park Lands were under threat from development including the Next generation Fitness Centre at the Adelaide Oval and the National Wine Centre. The latter development was pitched as a crucial building ensuring South Australia's wine industry. The economic benefit was not forthcoming - and failed to bring the business and activation expected.)
6. This Act is still in force and as relevant as ever. The 7 statutory principles can be summarised as:
 - Honouring the general intention of Colonel Light's original 1837 Plan of Adelaide;
 - Providing open space for the benefit of the people of South Australia, and to be available for their use and enjoyment;
 - the Park Lands to reflect and support a diverse range of environmental, cultural, recreational and social values and activities;
 - Provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City;
 - Contribute to the natural heritage and improve the biodiversity and sustainability of the Adelaide Plains;
 - To be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government;

- To reflect the interests of the South Australian community in maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

The Code does not address, either adequately or convincingly, the above principles.

9. It is relevant to note our Park Lands are also an intrinsic aspect of Adelaide's city design, recognised by the National Heritage List. Historically, the park lands were paid for by an early Governor out of his personal income to ensure that ownership of the park lands was linked to public access for passive and active leisure. This intent is reflected in the fact that Crown leases required the removal of buildings to restore the open nature and extent of the Park Lands outside the institutional, educational and health facilities of North Terrace.

In our opinion that the state government's proposed Code amendment displays a new low in unconscionable and dumb planning - on a par with the expansion of Mount Barker and Buckland Park on the Gawler River floodplain.

Furthermore, once the area is rezoned, the Code amendment material provided does not clearly communicate to people making comment that there is and will be no provision for formal public notification of proposed developments in the public interest if rezoning occurs. Currently Category 1 (no notification) prevails for all significant projects within the Park Lands. This is perverse with respect to democratic process, given the fact that the area is of significant public interest and civic pride.

In conclusion, community engagement undertaken after policies have been consulted and drafted with stakeholders is not consistent with the intent of the PDI Act's Community Engagement Charter. This is intended to engage fully on policy formulation, not merely allow comment on height, land use and functions on outcomes that appear to have already been decided.

We ask the Minister to require a thoroughly consulted, well informed and progressive Master Plan, consistent with the social, historic, tourism and biodiversity values before endorsing any Code amendment, given the current circumstances of climate change and the need to protect the city's heritage for posterity.

It is hoped the recipients of this submission will consider the concerns expressed, and look forward to the Minister's response in due course.

Yours sincerely

Dr Iris Iwanicki
President
Community Alliance SA Inc.
M: 0438535058
sa.community.alliance@ gmail.com

Appendix

Adelaide Park Lands Association

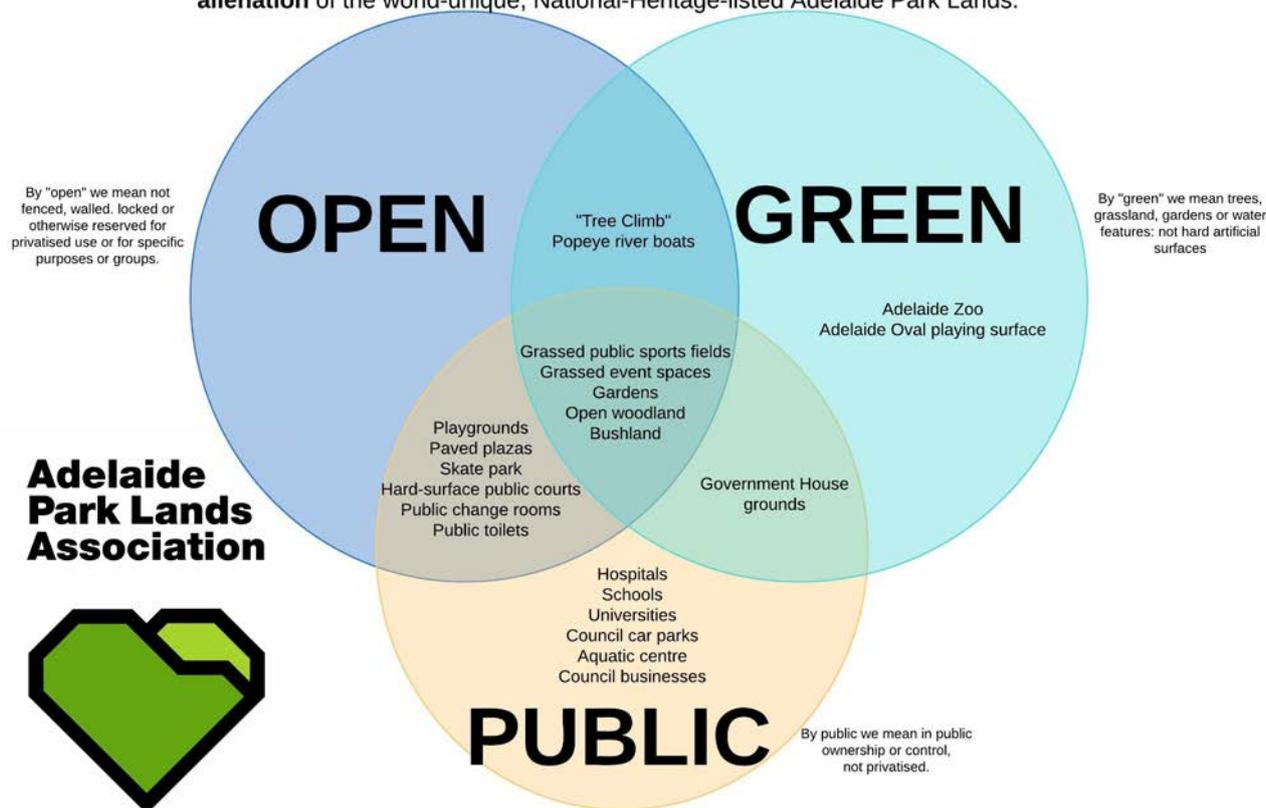
The Adelaide Park Lands Association is a community-based, non-profit organisation, founded in 1987. Under our strategic plan, adopted in 2021, we help the public:

- **explore** with Guided Walks, and trail guides
- become **inspired** with art and images, as we
- **protect** the Park Lands with advocacy campaigns against regular threats, and work to
- **restore** sites with re-greening and regular clean-up days.

There are at least 200 locations within the Park Lands that have been alienated from public use.¹ APA's benchmark diagram (below) proposes an easily-understandable distinction between uses that are consistent with the concept of Park Lands and those that are inconsistent. Hardly a month goes by without additional inconsistent land uses being proposed, considered or authorised.²

PARK LANDS ARE OPEN, GREEN, PUBLIC (at least 2 out of 3)

If a proposed building or other permanent land use can't fit into at least two of these overlapping circles, then it's an **alienation** of the world-unique, National-Heritage-listed Adelaide Park Lands.



Consistent with the above diagram, APA does not object to temporary fenced events within Park Lands, but clearly the duration and area of any public exclusion from Park Lands is relevant to whether a fenced land use would be consistent with the concepts of "public" and "open".

APA's reach and supporter base has been growing rapidly since a re-branding in 2021. We have several hundred full members, and thousands of newsletter subscribers, followers on social media, and unique website visitors. Our Association is the voice of the Adelaide Park Lands. APA is a member organisation of [Community Alliance SA](#) and of the ["Places You Love Alliance"](#).

¹ www.adelaide-parklands.asn.au/open-green-public

² www.adelaide-parklands.asn.au/current-issues

Sharon Young

Dear All

I write to voice my rejection of the planned building and development along the River Torrens. In particular I oppose the planned re-zoning of 70hectares (a whopping 10% of the entire Adelaide Parklands!)

Firstly in this time of climate crisis, and particularly in a hot, dry climate such as the Adelaide Plains experiences, it is a disgrace to be building on green spaces. We should be planning for MORE greened areas not less!

Secondly the current Covid conditions (more restrictive interstate than SA but applicable none-the-less), plus extensive scientific research, has demonstrated that access to nature and natural green environments is ESSENTIAL for mental health and wellbeing. These areas should be accessible for ALL to enjoy.

Lastly from an aesthetic perspective Adelaide should retain the vision of our first town planner – Col William Light – to keep our “Green” credentials and NOT become like every other overbuilt city in the world. Look at the examples of prime tourist cities of London, New York and Paris – their retention of large green open PUBLIC gardens are so much part of their attraction for visitors and city-dwellers alike. A welcome escape from the bustle of city life for students, those living and working in the city, those seeking restorative environments after illness in our city hospitals, as well as the many visitors to our great city.

YOUR “VISION” IS NOT THE VISION OF THE MAJORITY OF SOUTH AUSTRALIANS!

Sincerely,

Sharon Young

Shaun de Bruyn (Tourism Industry Council South Australia)

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Advocacy Organisation

Given name: Shaun

Family name: de Bruyn

Organisation: Tourism Industry Council South Australia (TiCSA)

Email address [REDACTED]

Phone number: [REDACTED]

Comments: Please find out letter of submission attached.

Attachment: TiCSA_Submission_Riverbank_Precinct_Code_Amendment_October_2021.pdf,
type application/pdf, 604.8 KB

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Attachment 5: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Code Amendment Team
Attorney-General's Department
GPO Box 1815
Adelaide SA 5001



plansa@sa.gov.au

19/10/2021

To whom it may concern,

RE: Riverbank Precinct Code Amendment

On behalf of the Tourism Industry Council South Australia (TiCSA), I am writing to provide a submission to the Riverbank Precinct Code Amendment.

TiCSA is the peak body for South Australia's tourism industry and represents over 1,000 tourism businesses across the state. Our purpose is to advocate for, engage with and strengthen tourism businesses to grow the visitor economy.

As you would be aware, the tourism and hospitality sector play a critical role in our state's economy in both driving economic prosperity and employment opportunities, across Adelaide and our regions. Prior to COVID-19, visitor expenditure in South Australia reached a record breaking \$8.1 billion, with 18,000 tourism businesses directly employing over 40,000 workers. Our industry has been hit hard by COVID, with our visitor economy now worth only \$5.8 billion.

As we transition from the health emergency phase into recovery and eventually focus our attention back to growth, our state needs to be well placed to stand out amongst our global competitors. Now is the time to re-imagine how we utilise our city's wonderful assets, to stimulate innovation and investment in the types of experiences and offerings that locals and visitors alike will seek in the future. Revitalising the Riverbank Precinct and maximising the activation, accessibility and social amenity of the area has been identified as a strategic opportunity for over 10 years now. And while great progress has been made in that time, there is far more potential that can be realised if the land is unlocked further.

The flow-on economic activity for Adelaide's visitor economy from the continued activation of the Riverbank Precinct cannot be underestimated. And while the Code Amendment is only an enabler of future investments, it should be recognised that it will contribute to the Government's *South Australian Visitor Economy Sector Plan 2030* which sets a bold ambition to grow our visitor economy to \$12.8 billion by 2030 and generate an additional 16,000 jobs by focussing on six priority areas: Marketing, Experience & Supply Development, Collaboration, Industry Capability, Leisure & Business Events and Promoting the Value of Tourism.

p 0400 379 349 | e info@ticsa.com.au

TiCSA: Tourism Industry Council South Australia

5 Pirie Street, Adelaide South Australia 5000
GPO Box 2071, Adelaide South Australia 5001 | www.ticsa.com.au | www.trusttheticksa.com.au
ABN. 64 992 585 804



In principle, TiCSA is supportive of the Riverbank Precinct Code Amendment, with the caveat that our support and feedback is limited to the two precincts that are directly related to tourism and our visitor economy – the Entertainment Precinct and the Active Waterfront Precinct. We do not make comment or have a position on the Health Precinct or Innovation Precinct proposed in the document.

Specifically, we offer the following comments:

- Precinct 2: Entertainment Precinct. Summary of issues and considerations (page 22 & 23):
 - Policy considerations should not only ‘facilitate additional food and beverage infill opportunities’ but other activations that deliver desirable visitor experiences.

- Precinct 3: Active Waterfront Precinct. Summary of issues and considerations (page 26):
 - Opportunities / issues should not only ‘activate the precinct through food and beverage offerings’ but other activations that deliver desirable visitor experiences.
 - Policy considerations – should a consideration be included for visitor and pedestrian safety around the precinct to support continued activation and vibrancy after dark (noting that safety has been addressed in Performance Outcome 4.4 (page 54) and proposed new Performance Outcome 2.6 (page 60)?

- Recommended policy changes (page 39 & 40):
 - We support all proposed zoning and policy changes relating to Entertainment Subzone.

- Attachment C – Proposed Code Policy
 - City Riverbank Zone:
 - DTS/DFP 1.1 (page 49): We have no objections to the addition of ‘Arena’. However, we question the intent of the existing item of ‘Entertainment venue’ – would an arena not constitute an ‘entertainment venue’? And if not, should terminology ‘entertainment venue’ be broadened to enable development of any type of venue that provides for visitor experiences – this could be entertainment-related but may also be cultural or other innovative experiences that have not yet been imagined.
 - We have no further comments or objections to the other proposed amendments for this Zone.
 - Riverbank Subzone:
 - We support the proposed Desired Outcomes, Performance Outcomes and DTS/DPFs and offer no further comment.

I welcome the opportunity to discuss any of the comments we have provided with you further. Please feel free to contact me directly on [REDACTED]

Warm regards,



Shaun de Bruyn
Chief Executive Officer
Tourism Industry Council South Australia (TiCSA)

p 0400 379 349 | e info@ticsa.com.au

TiCSA: Tourism Industry Council South Australia

5 Pirie Street, Adelaide South Australia 5000
GPO Box 2071, Adelaide South Australia 5001 | www.ticsa.com.au | www.trusttheticksa.com.au
ABN. 64 992 585 804

Sigrid Malessa

Dear Ladies and Sirs

I strongly object to the rezoning of the parklands and the plans to build on the Helen Majo Park in the parklands.

I am appalled that the State Government has been going through a process to amend the Planning Code where it applies to the so-called "Riverbank Precinct" i.e. a large part of the Adelaide Park Lands adjacent to the River Torrens.

The re-zoning would make it possible for a wide range of other, unspecified further projects which might become "part of the State Government's wider vision for the Riverbank precinct as a premier health, entertainment and cultural boulevard.

The parklands are a unique feature of Adelaide and as such should not be built on or minimised in any way. Particular in light of climate change we cannot afford to lose any green areas

Kind regards

Sigrid Malessa

Silva Larson

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. And this treasure belongs to us, residents of Adelaide, not State government.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

So no, you can't do it.

Sincerely

Silva Larson

Adelaide resident

Simon Carless

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Simon

Family name: Carless

Organisation: Popeye

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I'm one of the skippers on Popeye so know and love this area well, and promote it to our passengers. I have no major issues with developing the Entertainment district as it's quite scruffy and under-utilised anyway. I do however have a problem with any development on Pinky's Flat, this is a pristine park both from within and when viewed from the water or across the river. It should be maintained as open space. That is why it is a very popular spot for wedding photos. Temporary 'pop up' style stalls however could be tolerated in my opinion. Thankyou for your consideration.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Simon Healy

The beautiful Adelaide Parklands are unique. They are not free land for building car parks, stadiums, hotels and office buildings that could easily be placed elsewhere. They are crucial to our history. Once they're gone, Adelaide will be little better than numerous hot, drab mid-Western American cities that nobody wants to visit.

If the current land grab succeeds, it will obviously not be the last. This state government will be remembered solely for this because it will completely overshadow any positive achievements.

The state government needs to respect its inheritance and protect into the future what past generations have enjoyed and improved. As Adelaide's climate heats up further, the Parklands are crucial for shade and cooling, as well as providing peaceful, healthy spaces close to busy urban activity.

Show some imagination. Adelaide is not Melbourne and never will be. The Torrens Lake is not the flowing Yarra and never will be. Adelaide's constant attempts to copy Melbourne are pointless, doomed to fail, and are regularly made fun of by Victorians.

Show some pride in what makes our city unique and beautiful.

Simon Healy

████████████████████

████████████████

██

Simon Tait

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Sincerely

Simon Tait

Skye Krichauff

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Skye

Family name: Krichauff

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am shocked and surprised at this proposal being put forward by the current SA Government. Our parklands are a precious asset to the city of Adelaide and should remain as open space. If this is currently an underutilised part of the parklands, they should be landscaped and maintained. Peaceful and thoughtfully designed gardens that could be utilised by RAH staff, patients, visitors and the general public is a more visionary, long term and environmental outcome, rather than a commercial hub with concrete buildings - not something the Adelaide Parklands were ever intended for.

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sent to
proponent email: plansasubmissions@sa.gov.au

Skye MacDonald

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Skye

Family name: MacDonald

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please see attached submission setting out the strongest opposition to this rezoning proposal which is a massive over-reach, disproportionate to measures necessary or appropriate to support a hospital or arena.

Attachment: OPPOSITION_TO_THE_PARKLANDS_REZONING_PROPOSAL.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 33.8 KB

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proponent plansasubmissions@sa.gov.au
email:

OPPOSITION TO THE PARKLANDS REZONING PROPOSAL

Whilst the City Arena and Children's hospital may have a measure of support, the proposal is a MASSIVE OVERREACH beyond anything necessary or appropriate to facilitate those developments.

It would enable 70 hectares of parkland to be divided, sold and developed with no need for further public consultation. Make no mistake that this is the thin edge of the wedge which would allow the government to rezone now, and reveal the details later, when there would be no mechanism to stop it.

This proposal would be unthinkable in the great cities which we aspire to be like such as London and New York. This land doesn't belong to North Adelaide or the CBD but to the State and is one of its iconic features, and national heritage listed.

Detailed proposals for each of these developments should be provided for public scrutiny to demonstrate merit, **prior to rezoning**.

Public green space, in particular one of Adelaide's defining points of difference is not a magic pudding to allow governments of the day to buy the next election or provide favours to mates. This must be stopped.

Proposals on public land need to be dealt with on a case by case basis with full details available to scrutinise, not by the wholesale removal of restrictions, which could never be reversed.

Livable Cities and Climate Change

A key plank in the selection of the city was access to the environment – these needs to be preserved.

Green open space is critical to cooling cities and as the government seeks population growth and greater density these public spaces are more precious than ever.

Consultation Material

This is voluminous and difficult even for trained professionals to understand. It takes careful consideration to uncover what is not being said. This is a case of rezone now and provide details (or not) later when there is no requirement for consultation or role for the City of Adelaide.

Given the breadth of potential uses proposed, the failure to provide the assessment tables against which proposals would be measured is concerning and suspicious and fundamentally inappropriate – what is being hidden?

New Women's and Children's Hospital – whilst there is logic to collocating the hospital with the NRAH, the site is too small so that the proposed hospital is no bigger than the current one, when the government has a plan to grow the population. How can that be future proofing? This is in the context of the NRAH suffering severe ramping with no covid in the community. This is not a time for bread and circuses.

The land is contaminated and the site subject to significant constraints – there is a risk of major cost overruns and the delivery of a white elephant.

Innovation Zone

The attempt to rezone the small park south of Botanic High demonstrates how insidious this rezoning is. This park is one of the rare examples of parklands repatriated (taking years at great cost). It is zoned parklands and cant be built on. On the back of the construction of a school in the parklands the government wishes to rezone the adjacent park "Innovation". The materials make much of the need to preserve access from Frome Road to the Botanic Gardens and map out spaces to be preserved from building, as if they are motivated to protect this space. It currently has all the protection it needs and the only motivation for the rezoning is to allow development in this space.

This behaviour is misleading - wolf dressed in sheep's clothing. Leave this park alone.

I seem to be one of the few people who recalls that Mike Rann and John Hill promised that all of the former RAH would be repatriated except the heritage buildings. This has not occurred.

Entertainment Zone

The current entertainment centre has the benefit of a taxpayer funded tram extension and a footprint equivalent to that the proposed Arena. The current facility should be redeveloped in situ.

I further query 1) the value represented by \$665m to increase capacity by a mere 4000 seats in the riverbank arena (vis the current venue) 2) query the ability to bring it in on budget given the constraints and likely contamination of the arena site.

The intention is to use "free" public parkland for development and then sell off the current entertainment centre and children's hospital to improve the bottom line. Parklands do not belong to the government, they belong to the people each successive government is simply the custodian, tasked with handing them forward in no worse condition than when they took government.

Proposed uses overflow beyond even the new proposed zones – eg health and residential in the Entertainment zone. Why?

Inappropriate uses

The current historical and legislated appropriate park lands land uses such as recreation, sporting field and special events are explicitly removed – this in itself is telling. New uses which are utterly inappropriate include:

- Light industry – why? And no!
- Child care, research – not on public open space;
- Shops along the Torrens – these seem doomed to fail and should not compete with CBD locations where retail and food and beverage are struggling.
- 15- 20 story buildings – even with a step down, given their close proximity to the river this is inappropriate. Also as future Category 1 developments under the new zone, What assurance is there that even these heights will be adhered to, especially in the absence of consultation and oversight.
- Tourist accommodation – absolutely not on parklands. There are ample opportunities for hotels in North Adelaide and the CBD.
- Land division and sale – absolutely no!
- Structures (unlimited in number) and up to a footprint of 200 sqm on Pinkly Flat – how can the proponents describe this as small scale and compatible with existing structures and

indicate that they will be deemed to satisfy if they “complement the role of the river”. What does this mean?

- Cafes in the river? How are these accessed, are rowers to row through or around these?

Much of the ‘logic’ put forward is twisted:

- The fact that some areas have been fenced off from public access for decades, is used as support for permanent alienation rather than repatriation – a great connection could be made from Morphett St bridge to the fenced areas to the west, with out needing multirise development as justification.
- There is the false premise that major redevelopment of tracts of land is needed to deliver certain improvements in pedestrian and cycling access. There is nothing to prevent these from occurring now! Conversely, no public connection is proposed from North Terrace through the new health precinct to the river.
- The footprint of the propose arena is roughly the same as the current Entertainment Centre to benefit which the taxpayers paid for a tram extension. This can be redeveloped in situ for a whole lot less than \$665m.
- Adelaide is full of empty shopfronts, how are shops on the Torrens likely to fare?
- One can’t help but feel cynical that every government or Council event is preceded by a welcome to country yet the Kurna people have not been consulted by Planning SA on this proposal.

In conclusion, given the overreach of this proposal it is necessary to oppose the entire thing, including he NWCH and the Arena until the government come forward with an appropriate and tailored proposal and provide for adequate meaningful consultation.

Sonja Pappagallo

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards,
Sonja Pappagallo
Bowden, 5007.

Stacey Thomas

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Stacey

Family name: Thomas

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I am incredibly concerned by the proposed rezoning of the precinct. Adelaide's riverside areas should be protected as a key feature of our city, areas where any person can walk, exercise or play, year-round, at no cost. Green space is at a premium in cities and we should be conserving ours. I also have concerns at what the over-development would mean for environmental conservation and healthy waterways. Lastly, the cultural significance of the area to Kurna and First Nations should be noted and preserved. At an absolute minimum, a requirement that if a piece of riverside land is developed, an equal sized area of riverside land should be returned to its natural habitat should be enforced.

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Attachment 2: No file uploaded

Attachment 3: No file uploaded

Attachment 4: No file uploaded

Attachment 5: No file uploaded

sent to
proponent email: plansasubmissions@sa.gov.au

Stephanie Johnston

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Stephanie

Family name: Johnston

Organisation: Stephanie Johnston & Associates

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I support the position paper of Australia ICOMOS attached. I also support the position of the Adelaide Park Lands Authority as outlined in Item 3.1 of the attached report. I believe that the proposed Code Amendment (i) transgresses the intention of the Adelaide Park Lands Act to maintain and enhance Adelaide's publicly-owned green belt legacy for future generations, (ii) threatens many of the documented National Heritage values of the Adelaide Park Lands and City Layout National Heritage Place, and (iii) compromises the current bid for World Heritage listing of the Adelaide Plan and Settlement Landscapes. The Code Amendment should be abandoned or put on hold while these issues and impacts are investigated. The long term economic, social and environmental benefit of a successful World Heritage listing to the city of Adelaide (and its regions) has been well documented and would far outweigh any perceived benefit of enabling increased built form development on the north and south banks of the River Torrens. The Adelaide Park Lands and the River Torrens have been successfully activated through festivals and public events over the state's 185 year history, and indeed were the site of Kaurna cultural practices for thousands of years before that. As we approach Adelaide's bicentenary let us not destroy that priceless and continuing public open space heritage.

Attachment: AI_APL_Position_Paper.pdf, type application/pdf, 4.5 MB

Attachment 2: APLA_-_Authority_Special_Board_Meeting_-_Agenda_-_14_October_2021.pdf, type application/pdf, 347.3 KB

sent to
proponent email: plansasubmissions@sa.gov.au



Australia ICOMOS Secretariat
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Australia ICOMOS Position Paper on the Adelaide Park Lands and City Layout National Heritage Place including comments on the Riverbank Precinct Code Amendment 2021

12 October 2021

About Australia ICOMOS

ICOMOS – the International Council on Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an official Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 750 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia, which provides us with an exceptional opportunity to see best-practice internationally. We have a particular interest in Australia's World and National Heritage places.

Background to the Adelaide Park Lands and City Layout National Heritage Place, and the Riverbank Precinct Code Amendment 2021

This paper has been prepared to address a range of long-term issues with the effective protection and management of the Adelaide Park Lands and City Layout National Heritage place. It also provides a response to the current Riverbank Precinct Code Amendment (2021).

In 2008 the Adelaide Park Lands and City Layout was entered in the National Heritage List maintained under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Its National Heritage values include,

The Adelaide Park Lands and City Layout is a significant example of early colonial planning which has retained key elements of its historical layout for over one hundred and seventy years...

The Adelaide Plan... reflected new town planning conventions and contemporary ideas about the provision of common or reserved land for its aesthetic qualities, public health and recreation...

The key elements of the Plan remain substantially intact, including the layout of the two major city areas, separated by the meandering Torrens River, the encircling Park Lands, the six town squares, the gardens and the grid pattern of major and minor roads.

The Park Lands, in particular, are significant for the longevity of protection and conservation and have high social value to South Australians who regard them as fundamental to the character and ambience of the city of Adelaide.

The national significance of the Adelaide Park Lands and City Layout lies in its design excellence. The Adelaide Plan is regarded as a masterwork of urban design, a grand example of colonial urban planning... Features within the Park Lands area included a hospital, Government House, a school, barracks, a store house, a market and a botanic garden and roads.

The tree planting designed and implemented since the 1850s and the living plant collection of the Park Lands, particularly within the Adelaide Botanic Gardens are outstanding features. The encircling Park Lands provide for health and recreation for the inhabitants while setting the city limits and preventing speculative land sales on the perimeter.

The emphasis on public health, amenity and aesthetic qualities through civic design and provision of public spaces were to have an influence on the Garden City Movement, one of the most significant urban planning initiatives of the twentieth century... (Adelaide Park Lands and City Layout, National Heritage place record 105758)

A copy of the full official values and boundary plan are provided at Appendix A.

Many National Heritage places have a conservation or heritage management plan prepared to guide the management and conservation of the place. The 2013-2018 review of the National Heritage List (Department of the Environment and Energy 2019) noted that the management arrangements in place for the National Heritage listing for the park lands were the “2009 Management Strategy and development plans”. However, neither the current “Adelaide Park Lands Management Strategy 2015-2025”, nor the current Planning and Design Code (based on the former Adelaide City Development Plan) appear to be consistent with National Heritage management principles. These documents were never prepared to specifically address the management of the park lands’ diverse National Heritage values.

The Planning and Design Code (the Code) came into effect in Adelaide in 2021, replacing all Development Plans. The Code has several overlays that provide policy for heritage and historic places and areas, including for State Heritage Places, State Heritage Areas, Local Heritage Places and Historic Areas. There is no overlay for National Heritage places to help achieve an integrated approach, and no provisions in the SA planning system to identify if works are within the boundary of a National Heritage place, or to consider potential impacts on National Heritage places.

In September 2019 the South Australian Heritage Council considered the potential listing of the “Adelaide Park Lands, Squares and City Layout” as a State Heritage Area (SHA). It is understood that Heritage Standards will be prepared under the Planning and Design Code for the proposed SHA.

The history of the original area of park lands is complex, especially along North Terrace, where a series of developments have taken place over time. These have included railway facilities, a university and institute of technology, and a hospital from the 19th and early 20th centuries. Later commercial, entertainment and sporting facilities have also been developed or re-developed, and more recently a new hospital constructed. A major high-rise building is to be built behind the Adelaide Festival Centre. It is noted that many of these facilities are outside of the National Heritage place, although within the Adelaide Park Lands Plan as defined under the *Adelaide Park Lands Act 2005*, and within the setting of the National Heritage place.

Overview of the Riverbank Precinct Code Amendment

This amendment is proposed for the following reasons,

The State Government is progressing initiatives of State significance in the Riverbank precinct including the development of the proposed new Women’s and Children’s Hospital (nWCH). These initiatives are part of the State Government’s wider vision for the Riverbank precinct as a premier health, sporting, entertainment, education, and cultural boulevard and have been the subject of ongoing strategic consideration. (Plan SA, Riverbank Precinct Code, Amendment, draft for consultation, 2021, p. 6).

The amendment partly relates to the National Heritage listed area, as well as other areas which are part of the Adelaide Park Lands Plan as defined under the *Adelaide Park Lands Act 2005*. The total area of park lands impacted by the amendment is approximately 70 hectares. The amendment will apparently enable several substantial developments within the National Heritage listed park lands boundary, including:

- a multi-storey carpark and access road for the proposed Women’s and Children’s Hospital;
- a major entertainment building;
- expansion of a commercial innovation precinct; and
- a range of community, cultural, tourism, shop and licensed premises located ‘on-water and off-water’ on the northern banks of the Karrowirra Parri/River Torrens.

These are the current proposals, and it seems likely additional future developments may arise which will be facilitated by the Code amendment, as new land uses include:

- arena;
- community centre;
- consulting room;
- convention centre;
- educational establishment;

- entertainment venue;
- helicopter landing facility;
- hospital;
- hotel;
- licensed premises;
- land division;
- light industry;
- office;
- pre-school;
- shop;
- serviced apartments; and
- tourist accommodation.

In terms of built form, the Code amendment will allow 15-20 storey buildings and 53-71 metre building heights.

The Code amendment will also allow for land subdivisions within the National Heritage place and public notification will no longer be required for any development application except the demolition of a State or Local Heritage Place.

Additionally, a number of current uses that support the National Heritage values will be removed by the proposed Code amendment. These include a range of open space, recreation and sporting activities, as well as special events.

Key General Overarching Issues for the Adelaide Park Lands and City Layout

The key issues affecting the park lands include:

- incremental and substantial development pressure within and adjacent to the National Heritage place, involving major developments in the past, current proposals and possible future developments that may have a cumulative adverse impact on the National Heritage values;
- the development of major buildings and roadways which erode the open and landscape qualities of the park lands, including the meaningful connectivity of the encircling park lands in the vicinity of Bonython Park, preclude the restoration of the park lands, impact on the grid layout, or which are unsympathetic in the setting of the park lands, any of which may adversely impact on the National Heritage values, including its social values; and
- the inclusion of uses which are not consistent with the general character of the park lands, or create an imbalance of uses which may affect the overall landscape character and the National Heritage values.

Of great concern is that the proposed Code amendment is only the latest example of development pressure on the park lands. There is no established carrying capacity for the park lands that defines the extent and character of sympathetic development, and such pressure will continue to arise over time.

It is understood that the proposed Code amendment may not be a matter (an action) that can be considered under the EPBC Act, which is focused on specific projects. In the latter case, the normal process involves undertaking a self-assessment (heritage impact assessment) of a particular action to determine if it is likely to have a "significant impact" on National Heritage values. The proponent determines if a referral under the EPBC Act is required.

An "action" is defined in the EPBC Act as: a project, a development, an undertaking, an activity or a series of activities, or an alteration of any of these things (section 523). Actions include, but are not limited to: construction, expansion, alteration or demolition of buildings, structures, infrastructure or facilities, earthworks and vegetation clearing. However, government authorisations for another person to take an action are not actions (section 524).

Additional concerns include:

- there is uncertainty in relation to the proposed approvals process following rezoning, noting the apparent overall lack of coherence between City planning, State planning legislation and policy,

and National Heritage considerations under the EPBC Act, and heritage impact assessment in relation to actions within the boundary of or impacting upon the setting of the National Heritage place and State Heritage Places;

- there is no conservation management plan for the National Heritage place, consistent with the National Heritage management principles and other requirements under the EPBC Act;
- there appear to be nine land managers for the park lands National Heritage place, it is unclear if they all have appropriate policies and processes to protect and manage the place, that they understand their obligations under the EPBC Act, and that these management systems provide for an integrated outcome; and
- heritage impact assessments for proposed works in or adjacent to the National Heritage place must be prepared by relevant heritage experts, they are not always publicly available, or available at an early stage to enable public scrutiny prior to development approval being granted.

Specific Additional Issues with regard to the Sub-Zones in the Code Amendment

Health Sub-Zone

- Potential adverse impacts on National Heritage park lands, and State Heritage Places or potential places (eg. the olive grove).
- Construction of multi-storey carpark on park lands/loss of or impacts on park lands landscape.
- Permits new building heights up to 15 storeys or 53 metres which would impact on park lands landscape.
- Proposed land uses are inconsistent with park lands landscape.

Entertainment Sub-Zone

- Construction of arena on park lands/loss of or impacts on park lands landscape.
- Permits new building heights up to 20 storeys or 71 metres which would impact on park lands landscape.
- Proposed land uses are inconsistent with park lands landscape.
- Adverse impacts on Colonel Light's grid layout, which is a key component of the National Heritage listing.

Riverbank Sub-Zone

- Potential impacts on Pinky Flat as a place of significance to the Kurna community.
- May lead to development on park lands/loss of or impacts on park lands landscape.
- Proposed land and water uses are inconsistent with park lands landscape.

Innovation Sub-Zone

- No valid reason has been offered for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone).
- May lead to development on park lands/loss of or impacts on park lands landscape.
- Proposed land uses are inconsistent with park lands landscape.
- Frome Park/Nellie Raminyemmerin Park cannot be disturbed as it contains a fully authenticated and documented Kurna Aboriginal burial site listed on the Register of Aboriginal Sites and Objects under the *Aboriginal Heritage Act 1988*. It also contains contaminated material to a depth of 1.5 metres.

Recommendations regarding the Future Protection and Management of the Adelaide Park Lands and City Layout

Given all of this context, Australia ICOMOS is opposed to implementation of the Code amendment while more fundamental issues need to be addressed. Accordingly, Australia ICOMOS makes the following recommendations.

1. The Code amendment process is deferred until a range of fundamental issues are addressed regarding the future protection and management of the park lands.
2. Kurna consultation is undertaken as part of any future proposed Code amendment affecting the Adelaide Park Lands.

3. An analysis be undertaken to establish the carrying capacity for the park lands which defines the extent and character of sympathetic development consistent with the protection of National Heritage values.
4. Consideration be given to undertaking a strategic assessment under the EPBC Act, as a higher level strategic planning process for the National Heritage place. This might include the carrying capacity analysis recommended above.
5. A review should be undertaken to establish how City, State and Commonwealth systems can achieve greater coherence in the protection and management of the National Heritage place, including with regard to heritage impact assessment. This would assist in identifying owner and proponent obligations under the EPBC Act.
6. Heritage impact assessments prepared by relevant heritage experts for proposed works in or adjacent to the National Heritage place should be prepared and made publicly available at an early stage to enable public scrutiny prior to development approval being granted.
7. A conservation management plan for the National Heritage place should be prepared, consistent with the National Heritage management principles and other requirements under the EPBC Act.
8. A system should be developed to ensure the integrated management of the National Heritage place amongst the various land managers within the area, and this should be documented in the conservation management plan.

Appendix A: Adelaide Park Lands and City Layout – National Heritage values and Boundaries

The Adelaide Park Lands and City Layout was included on the National Heritage List in 2008 and was found to meet six of the eight heritage criteria under the EPBC Regulations.

National Heritage Values

Criterion (a) the place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is the physical expression of the 1837 Adelaide Plan designed and laid out by Colonel William Light. It has endured as a recognisable historical layout for over 170 years retaining the key elements of the plan; encompassing the layout of the two major city areas separated by the Torrens River, the encircling Park Lands, the six town squares, and the grid pattern of major and minor roads. It is substantially intact and reflects Light's design intentions with high integrity.

The Adelaide Park Lands and City Layout is of outstanding importance because it signifies a turning point in the settlement of Australia. It was the first place in Australia to be planned and developed by free settlers, not as a penal settlement or military outpost. The colony of South Australia was established by incorporation as a commercial venture supported by the British Government, based on Edward Wakefield's theory of systematic colonisation. To be commercially successful, there needed to be contained settlement to avoid speculative land sales and this settlement needed to be designed and planned to attract free settlers and to provide them with security of land tenure. The city layout with its grid plan expedited the process of land survey enabling both rapid settlement of land and certainty of title. The wide streets, public squares and generous open spaces provided amenity and the surrounding park lands ensured a defined town boundary while still allowing for public institutional domains. These elements are discernable [sic] today.

The Adelaide Park Lands is also significant for the longevity of its protection and conservation. The Adelaide Municipal Corporation Act (1840) established the city council as the 'conservators' of the city and park lands. The establishment of the Park Lands Preservation Society in 1903, along with successive community organisations marks a continuing pattern in community support for safeguarding the significance of the Park Lands for the Adelaide community.

The Adelaide Plan was highly influential as a model for planning other towns in Australia and overseas. It is acknowledged by town planners and historians as a major influence on the Garden City Planning movement, one of the most important urban planning initiatives.

Criterion (b) the place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth-century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth-century park lands in Australia.

Criterion (d) the place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of: (i) a class of Australia's natural or cultural places; or (ii) a class of Australia's natural or cultural environments.

The Adelaide Park Lands and City Layout is an exemplar of a nineteenth-century planned urban centre. It demonstrates the principal characteristics of a nineteenth century city including a defined boundary, streets in a grid pattern, wide streets, public squares, spacious rectangular blocks and expansive public open space for commons and public domains. The expression of these features with their generous open space reflects the early theories and ideas of the Garden City movement of an

urban area set in publicly accessible open space with plantings, gardens, designed areas and open bushland.

Criterion (f) the place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.

Adelaide Park Lands and City Layout is regarded throughout Australia and the world as a masterwork of urban design. Elements of the Adelaide Plan that contribute to the design excellence are the use of the encircling park lands to define the boundary of the development of the city and to provide for health, public access, sport, recreation and public institutional domains, thereby meeting both economic and social requirements. Designing the city layout to respond to the topography was highly innovative for its time with the northern sections of the city located and angled to take advantage of the rising ground while retaining the Torrens River as a feature within the Park Lands. The judicious siting and wide streets maximised views and vistas through the city and Park Lands and from some locations to the Adelaide Hills. The plan features a hierarchy of road widths with a wide dimension to principal routes and terraces and alternating narrow and wide streets in the east-west direction. Light's planning innovation is supported by substantial historical documentation.

The formal organisation, delineation and dedication of the Park Lands space was a pioneering technical achievement of William Light in the Adelaide Plan.

The overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas, formal avenues, plantations, gardens, use of specimen trees, botanically important living plant collections particularly at the Adelaide Botanic Garden and the strategic placement of buildings and statuary in their settings.

The creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills. The civic design of Adelaide was used as a model for founding many other towns in Australia and New Zealand and it is cited in later seminal Garden City planning texts including 'Garden Cities of Tomorrow' by Ebenezer Howard.

Criterion G the place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

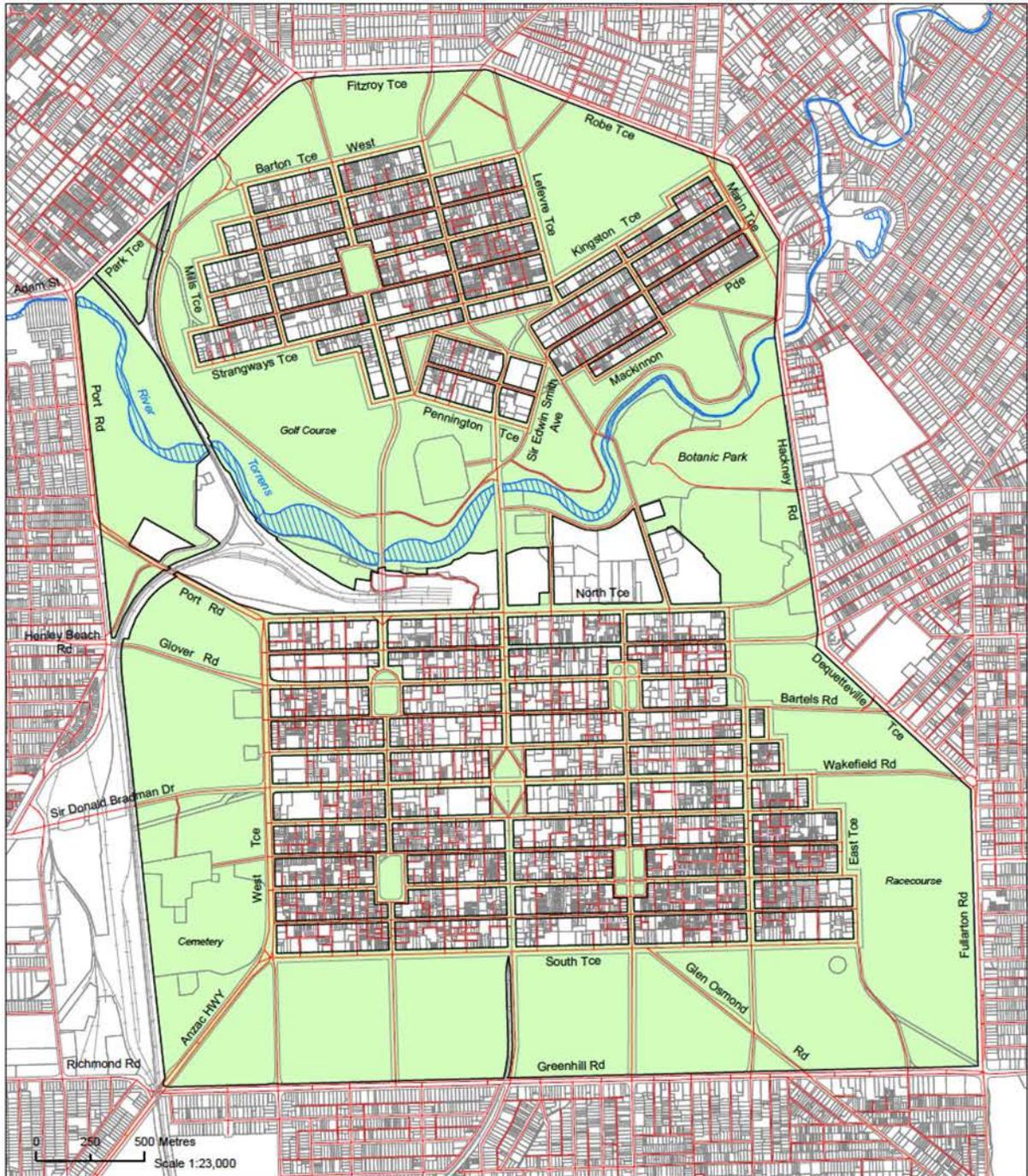
The Adelaide Park Lands has outstanding social value to South Australians who see it as fundamental to the character and ambience of the city. The Park Lands with their recreation areas, sports grounds, gardens and public facilities provide venues for individual and group activities and events, meetings and passive and active recreation. The Park Lands also have significant social value due to the range of important civic, public, and cultural assets and institutions within it.

The present Adelaide Parklands Preservation Society is the latest in a long history of community groups dedicated to protecting the Adelaide Park Lands. These have included the Park Lands Defence Association (1869-87), the Park Lands Preservation League (1903, 1948) and the National Trust of South Australia. The longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands is exceptional.

Criterion H the place has outstanding heritage value to the nation because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history.

Colonel William Light is most famously associated with the plan of Adelaide. He bore the ultimate responsibility, as recorded in his surviving publications and letters.

Boundary Map



LEGEND

 Listed place

 Australian Government
Department of the Environment, Water, Heritage and the Arts

The Adelaide Park Lands and City Layout

National Heritage List
Place ID: 105758 File: 3/03/001/0279

Data Sources:
Cadastre for Australia (SA) - Cadlite
RoadNet Comprehensive - Roads
RoadNet Comprehensive - Railways
© 2008 MapData Sciences Pty Ltd, PSMA
Produced by: Heritage Division
Canberra, GDA94, 7/11/2008
© Commonwealth of Australia, 2008.



The Adelaide Park Lands Authority was established by the *Adelaide Park Lands Act 2005 (SA)* as a subsidiary of the City of Adelaide under the provisions of the *Local Government Act 1999 (SA)*.

As part of the Park Lands governance framework the Adelaide Park Lands Authority is the principle advisory body to the City of Adelaide (CoA) and the South Australian State Government (SG) on Park Lands matters.

The Authority provides guidance around the use of and improvement to the Adelaide Park Lands through the development of the Adelaide Park Lands Management Strategy 2015 – 2025, which can be found [here](#)

Thursday 14 October 2021 Special Board Meeting

Membership

The Lord Mayor
4 other members appointed by the Council
5 members appointed by the Minister

Quorum

6

Presiding Member

The Right Honourable the Lord Mayor Sandy Verschoor

Deputy Presiding Member

Ms Kirsteen Mackay

Board Members

Ms Allison Bretones
Mr Rob Brookman AM
Ms Jessica Davies-Huynh
Mr Stephen Forbes
Councillor Alexander Hyde
Ms Stephanie Johnston
Mr Craig Wilkins
Mr Ben Willsmore

Proxy Board Members

Councillor Arman Abrahamzadeh (for Councillor Alexander Hyde)
Professor Emeritus Damien Mugavin (for Ms Stephanie Johnston)



Special Board Meeting Agenda, Thursday 14 October 2021, at 4:30 pm
Colonel Light Room, Town Hall, King William Street, Adelaide

Agenda

		Purpose	
1.	Welcome and Opening		
1.1	Acknowledgement of Country	To Acknowledge	Page 3
1.2	Apologies	To Note	Page 3
2.	Conflict of Interest	To Note	
3.	Items for Board Decision		
3.1	Riverbank Precinct Code Amendment [2021/01631]	Decision to advise State Government & City of Adelaide	Page 4
3.2	Request for Care and Control of Kate Cocks Park to be transferred to the Minister for Health and Wellbeing [2021/01631]	Decision to advise State Government & City of Adelaide	Page 12
3.3	National Park City (Adelaide) Charter [2007/00341]	Decision	Page 16
4.	Special Meeting Close		
	Next meeting – Thursday, 28 October 2021, 5.30pm	To Note	

1. Welcome and Opening

1.1 Acknowledgement of Country

At the opening of the Special Board Meeting, the Board member presiding will state:

'Adelaide Park Lands Authority acknowledges that we are meeting on traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past and present. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

And we also extend that respect to other Aboriginal Language Groups and other First Nations who are present today.'

1.2 Apologies

Deputy Presiding Member – Ms Kirsteen Mackay (Conflict of Interest disclosed 23 September 2021)

Board Member - Ms Jessica Davies-Huynh (Maternity Leave 3 Months)



Riverbank Precinct Code Amendment

ITEM 3.1 14/10/2021
Board Meeting

Author:

Lara Daddow, Acting Associate
Director, Park Lands, Policy &
Sustainability 8203 7884

2021/01631
Public

Purpose

To facilitate discussion and to seek the Authority's advice to the State Government and the City of Adelaide on the Riverbank Precinct Code Amendment which may affect the values and status of the Adelaide Park Lands.

Recommendation

THAT THE ADELAIDE PARK LANDS AUTHORITY ADVISES THE STATE GOVERNMENT AND COUNCIL:

That the Adelaide Park Lands Authority:

1. Provides its advice regarding the proposed Riverbank Precinct Code Amendment as outlined in Attachment A to Item 3.1 on the Agenda for the Special Meeting of the Adelaide Park Lands Authority held on 14 October 2021.
 2. Notes that the Presiding Member will write to the Premier of South Australia (cc'd to Minister for Planning & Local Government and the Minister for Environment & Water, CEO of the Attorney General's Department and the State Government's Planning and Land Use Services) to outline the Adelaide Park Lands Authority advice on this matter.
-

Implications

<p>Adelaide Park Lands Management Strategy 2015-2025</p>	<p>Adelaide Park Lands Management Strategy 2015-2025</p> <p>The current APLMS does not contemplate:</p> <ul style="list-style-type: none"> • The type of development enabled by the Riverbank Precinct Code Amendment, such as: <ul style="list-style-type: none"> ○ Large scale-built form on Pinky Flat (Tarntanya Wama (Park 26)) ○ Large multi-storey buildings or residential apartment buildings • A large indoor Riverbank Arena in Helen Mayo Park (Park 27) <ul style="list-style-type: none"> ○ Strategy 1.4 only supports buildings in the Park Lands where they provide for outdoor recreation. • A multi-storey car park in Kate Cocks Park (Park 27) <ul style="list-style-type: none"> ○ Strategy 2.8 only contemplates parking on the Park Lands for Park Lands related recreational purposes, which is to be reduced by 5% in the period to 2025. • A second hospital at the western end of the Royal Adelaide Hospital site, which the hospital's Master Plan reserves as open space to strengthen the continuity of Adelaide's Park Lands.
<p>APLA 2020-2025 Strategic Plan</p>	<p>Adelaide Park Lands Authority 2020-2025 Strategic Plan</p> <p>APLA's purpose is stated as:</p> <p><i>To conserve and enhance the environmental, cultural, recreational, and social importance of the Adelaide Park Lands</i></p> <p>Guiding Principles for APLA to use are:</p> <ul style="list-style-type: none"> • <i>Preserve and strengthen the integrity of the Adelaide Park Lands</i> • <i>Promote the values of the Park Lands – as Adelaide's defining feature, and an internationally unique asset</i> • <i>Contribute to the delivery of The City of Adelaide's Strategic Plan and vision, and the State Government's 30-year plan for Greater Adelaide.</i>
<p>Policy</p>	<p>Not as a result of this report</p>
<p>Consultation</p>	<p>Not as a result of this report</p>
<p>Resource</p>	<p>Not as a result of this report</p>
<p>Risk / Legal / Legislative</p>	<p>To enable APLA to fulfill its statutory function to provide advice to the Council and State Government on policy, development, heritage or management issues affecting the Adelaide Park Lands.</p>
<p>Opportunities</p>	<p>Not as a result of this report</p>
<p>City of Adelaide Budget Allocation</p>	<p>Not as a result of this report</p>
<p>Life of Project, Service, Initiative or (Expectancy of) Asset</p>	<p>Not as a result of this report</p>
<p>Ongoing Costs (eg maintenance cost)</p>	<p>Not as a result of this report</p>
<p>Other Funding Sources</p>	<p>Not as a result of this report</p>

Discussion

1. At its meeting on 26 August 2021, the Authority received a presentation from the State Government on the proposed Riverbank Precinct Code Amendment.
2. The Draft Riverbank Precinct Code Amendment was released for public consultation on Wednesday 15 September 2021. Submissions are invited until 27 October 2021.
3. At its meeting on 23 and 30 September 2021, the Authority discussed the proposed Code Amendment and their preference for consultation feedback to be a high-level response reiterating the values of the Park Lands and the importance of the Riverbank Precinct.
4. Section 4 of the *Adelaide Park Lands Act 2005 (SA)* contains seven statutory principles which guide the operation of the Act and therefore guide the management of the Park Lands. These principles are summarised as follows. The Adelaide Park Lands should:
 - 4.1. Correspond with the general intention of Colonel William Light's first Plan of Adelaide in 1837.
 - 4.2. Be held for the public benefit of the people of South Australia and be available for their use and enjoyment.
 - 4.3. Reflect and support a diverse range of environmental, cultural, recreational and social values and activities.
 - 4.4. Provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City.
 - 4.5. Contribute to the natural heritage and improve the biodiversity and sustainability of the Adelaide Plains.
 - 4.6. Be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government.
 - 4.7. Reflect the interests of the South Australian community in maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.
5. The Adelaide Park Lands Management Strategy does not contemplate:
 - 5.1. Large scale permanent multi-storey built form, residential development or tourist accommodation in the Adelaide Park Lands.
 - 5.2. A large indoor Riverbank Arena in Helen Mayo Park (Park 27).
 - 5.3. A multi-storey car park in Kate Cocks Park (Park 27) (Note that car parking on the Park Lands is only contemplated when associated with use of the Park Lands and no reasonable alternative is available).
 - 5.4. A second hospital at the western end of the Royal Adelaide Hospital site.
6. In addition, the relevant Community Land Management Plans do not envisage significant built form on the Park Lands.
7. The current Adelaide Park Lands Zone provides the following Desired Outcomes which sets the general policy agenda for the Zone:
 - 7.1. A unique publicly accessible and well connected open space system, including the formal city squares, that creates a distinctive landscaped park setting for the City of Adelaide.
 - 7.2. A range of passive and active recreational activities with a high-level of amenity, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of temporary events, such as festivals, concerts and sporting events.
8. The Adelaide Park Lands Zone also provides policies which seek to minimise any new building footprint on the Adelaide Park Lands.
9. The Riverbank Precinct Code Amendment proposes to move several areas within the Adelaide Park Lands and rezone it to the City Riverbank Zone. In doing so, it will remove several relevant key policies which protect the open, accessible landscaped character of the Adelaide Park Lands. Additionally, at odds with the Adelaide Park Lands principles, the City Riverbank Zone envisages high rise built form.

10. Council and the Adelaide Park Lands Authority have consistently, when assessing built form in the Park Lands, looked to minimise the built form footprint, either by reducing the base floor plate or by seeking a net offset in another part of the Park Lands.
11. The Authority also requested aerial photos showing the heritage places and land tenure arrangements in the Riverbank Precinct of the Adelaide Park Lands, which can be found Link 1 [here](#).
12. It is recommended that the draft key messages as outlined in **Attachment A** form part of a letter to the Premier of South Australia (cc'd to Ministers for Planning & Local Government and Environment & Water, CEO of the Attorney General's Department and State Government's Planning and Land Use Services) and constitutes the advice of the Authority on this matter.
13. The draft key messages for submission outlines the:
 - 13.1. Board's position, purpose and responsibilities.
 - 13.2. values of the Adelaide Park Lands and the rationale for their inclusion (along with the City Layout) on the National Heritage List.
 - 13.3. erosion of Park Lands that has occurred in the Riverbank Precinct.
 - 13.4. adequacy of current planning provisions to appropriately activate the Riverbank Precinct.
 - 13.5. inconsistency of the policy which may allow a multi-storey car park associated with the new Women's and Children's Hospital and the Riverbank Sports Arena with the statutory principles in the *Adelaide Park Lands Act 2005 (SA)* and the Adelaide Park Lands Management Strategy.
14. The recommended detailed advice on the Riverbank Precinct Code Amendment proposals is summarised as:
 - 14.1. it is very challenging to consider the proposed changes in the absence of a broader Master Plan.
 - 14.2. a strategic assessment under the EPBC Act be undertaken before the Amendment is progressed further to ensure the policy directions are consistent with the heritage values of the National Heritage Place.
 - 14.3. Health Subzone: No objection to new Women's and Children's Hospital site within the current zoning, however, do not support the expansion of built form into Kate Cocks Park and encourage the State Government to find an alternate location and/or solution. Do not support the rezoning of this land from Adelaide Park Lands Zone.
 - 14.4. Entertainment Subzone: Request no net loss of Park Lands and suggest that for any additional built form, that open and publicly accessible green space is created possibly by creating new open space over the train corridor.
 - 14.5. Innovation Subzone: Do not support the proposal to rezone this land as it is not required to facilitate the existing High School and the land is important open space, provides critical connections within the Park Lands, provides habitat for protected species and is a highly significant site for Kaurana.
 - 14.6. Riverbank Subzone: The area is already activated through the existing Adelaide Park Lands Zone principles and hosts many events annually. Do not support the proposal to rezone this land as the land is highly significant to Kaurana and this should be respected and left free from additional built form.

Attachments

Attachment A – Key Messages for Submission on Riverbank Precinct Code Amendment

- END OF REPORT -

Key Messages for Submission on Riverbank Precinct Code Amendment

The Riverbank Precinct lies at the heart of the Adelaide Park Lands, as defined by the *Adelaide Park Lands Act 2005 (SA)* (the Act).

The Act was developed in the early 2000s at a time when the Adelaide Park Land were under threat from development, most notably in the form of the National Wine Centre and Next Generation fitness centre. The purpose of the Act was to *“establish a legislative framework that promotes the special status, attributes and character of the Adelaide Park Lands; to provide for the protection of those park lands and for their management as a world-class asset to be preserved as an urban park for the benefit of present and future generations”*.

Importantly, the Act contains seven statutory principles, which, in summary state that the Adelaide Park Lands should:

- Correspond with the general intention of Colonel William Light's first Plan of Adelaide in 1837
- Be held for the public benefit of the people of South Australia, and be available for their use and enjoyment
- Reflect and support a diverse range of environmental, cultural, recreational and social values and activities
- Provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City
- Contribute to the natural heritage and improve the biodiversity and sustainability of the Adelaide Plains
- Be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government
- Reflect the interests of the South Australian community in maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

Subsequent to the establishment of the Act, in 2008 the Adelaide Park Lands and City Layout was included on Australia's National Heritage List, which states:

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth century park lands in Australia.

The inclusion on the National Heritage List, as “a masterwork of urban design”, confirmed the importance of the Park Lands to Adelaide's identity and to the Nation's heritage. It was included for many reasons, including that the Park Lands and City Plan is *“substantially intact and reflects Light's design intentions with high integrity”*. In the Board's view the wholesale changes which could be brought about through the ambitious provisions of the Riverbank Precinct Code Amendment would seriously undermine the integrity of the Park Lands and further enable the commodification of our public land. For this reason it is recommended the State Government undertake a strategic assessment under the *Environment Protection and Biodiversity Conservation Act 1999* prior to progressing the policy changes to ensure the policy directions are consistent with the heritage values of the National Heritage Place.

Over the last 184 years, that stretch of the Adelaide Park Lands between North Terrace and River Torrens / Karrawirra Pari, some 166ha, has been subject to continuous built form encroachments. Over 71ha, or 42%, of that space has been lost to various institutions, venues, hotels, hospital and car parks.

The remaining tenuous strips of green Park Lands between the ever-encroaching built form and River Torrens / Karrawirra Pari need enhancing as open recreational space, to maintain the green connections to and along the River. Colonel Light is often quoted as saying that one of the primary reasons he located Adelaide where he did was because of the superior connections with River Torrens / Karrawirra Pari. Let us not lose those critical green connections.

Under the Act and Adelaide Park Lands Management Strategy (which was adopted by Council and the State Government in 2017) it is incumbent on the Board, Council and State Government to prevent the erosion of open space and to protect and nurture the Park Lands.

The current Planning and Design Code, Adelaide Park Land Zone provides Desired Outcomes which seek:

- A unique **publicly accessible and well connected open space system**, including the formal city squares, that creates a distinctive landscaped park setting for the City of Adelaide.
- A range of **passive and active recreational activities with a high-level of amenity**, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of **temporary** events, such as festivals, concerts and sporting events.

Rezoning land within the Adelaide Park Land Zone will remove these key Desired Outcomes of the Park Lands and instead replace them with Desired Outcomes which envisages built form. Whilst the Desired Outcomes of the proposed City Riverbank Zone recognise connections with the Adelaide Park Lands, it is the opportunity for increased built form on the Adelaide Park Lands that the Board does not support.

The Riverbank Precinct Code Amendment clearly envisages more built form and further loss of open space. The removal of land from the Adelaide Park Lands Zone in the Riverbank Precinct Code Amendment sets up a planning framework that could lead to development which is inconsistent with Park Lands values. This could include an increase in buildings, particularly the scale of such buildings, less emphasis on open space and less emphasis on public use which, in turn, will lead to the alienation of public land. It is difficult to understand the State Government's vision for the Riverbank Precinct without a current Master Plan. The Board urges the State Government and the City of Adelaide to engage, finalise and release a current master plan for the entire Riverbank precinct. This process should occur prior to any planning policy changes being implemented.

Riverbank Subzone

The Riverbank Precinct Code Amendment proposes to create a new Riverbank Subzone over the River Torrens and the north and south banks of the Adelaide Park Lands. The Board does not support this proposal for a number of reasons.

In relation to existing uses, the CoA already leases a number of buildings, either former boat sheds converted to cafes or restaurants or still being used as boat sheds. Those buildings, or buildings within those locations date back a hundred years. In addition to

the historic built form in this precinct, Council facilitates many large and small events are held in Elder Park, Pinky Flat, Barr Smith Walk and elsewhere each year, making the Riverbank an already well activated site. All this, and more, can occur under the existing planning provisions.

Further, it is well understood that the River Torrens / Karrawirra Pari is of great significance to Kaurna, particularly Pinky Flat and the adjacent Adelaide Oval area which, together, formed an important camp site and corroboree ground. For this reason, the northern banks of the River Torrens should be respected and left free from permanent built form.

Health Subzone

The Board does not oppose the location for the new Women's and Children's Hospital. However, the Riverbank Precinct Code Amendment's proposed Health Subzone extension on to Kate Cocks Park (Park 27) allows for a commercial car park to be built in association with the new Women's and Children's Hospital and potentially other commercial buildings, to a possible height of 15 building levels. This area is the remaining open Park Lands space between the State Heritage sites of the Adelaide Gaol and the Police Barracks. Kate Cocks Park is first and foremost part of the Adelaide Park Lands. The additional built form that the Riverbank Precinct Code Amendment would allow, of such a scale is at odds with the spirit and provisions of both the statutory principles in the Act and the Adelaide Park Lands Management Strategy. For these reasons the Board does not support any additional built form on Kate Cocks Park. The State Government should consider alternative locations and design options to provide car parking to the proposed new Women's and Children's Hospital that does not include another incremental loss of the Adelaide Park Lands. There needs to be a vision for the health precinct that includes protecting the valuable green space that is the Park Lands and linking the precinct back to the city.

The Board urges the State Government to work with the City of Adelaide to implement the vision of the Adelaide Park Lands Management Strategy for Kate Cocks Park (Park 27) and transform this space into a beautiful park setting to complement the historic Gaol and area.

Entertainment Subzone

The Riverbank Precinct Code Amendment's Entertainment Subzone extension on to Helen Mayo Park (Park 27) allows for an entertainment arena, residential, commercial and health developments. Helen Mayo Park (Park 27) is a slim stretch of green Park Lands re-created out of dis-used rail land. The proposed Entertainment Subzone provides a height guidance of 20 building levels, providing a transition down in scale toward the river however no further guidance is provided as to an appropriate transition or the interface with the river. Getting this right will be particularly important given the narrowness of the site.

The Board suggests that an arena, with active uses at ground level may be appropriate, but only if there is no net loss of Park Lands. Investigations of innovative ways to provide city green space should be undertaken to determine whether any design aspects may be appropriate in the context. For example, the famous High Line in New York City is a great example of preservation and innovation coming together, through the adaptive reuse of an existing structure to create new recreational amenity and public promenades. With a master plan for the Entertainment Precinct, perhaps a similar approach by building over the railway lines to provide a new recreational space may mean there would be no net loss of Park Lands to the people of South Australia and may result in an excellent, high quality design outcome.

Innovation Subzone

Frome Park / Nellie Raminyemmerin, between the new Botanic High School and the Lot Fourteen site, was reclaimed as public green space from an old car park in the late 1990s. It forms a valuable green space connection to the Botanic Garden, is used for WOMA Adelaide and other events and contains a little known, but highly significant site for Kaurana. There has been no valid reason given for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone - Innovation Subzone and rezoning is not required as the high school has existing land use rights. The rezoning puts Frome Park at risk as it enables the transition from open green space to an ancillary area for Lot Fourteen and Botanic High School. The Board does not support the extension of the Innovation Subzone to the proposed location and requests that it remain within the more appropriate Adelaide Park Lands Zone.

Summary

Large-scale built form, such as sporting arenas, commercial car parks and residential or commercial buildings, are completely at odds with the statutory principles of the Park Land's Act including:

- the land comprising the Adelaide Park Lands should, as far as is reasonably appropriate, correspond to the general intentions of Colonel William Light in establishing the first Plan of Adelaide in 1837; and
- the interests of the South Australian community in ensuring the preservation of the Adelaide Park Lands are to be recognised, and activities that may affect the Park Lands should be consistent with maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the State.

The Adelaide Park Lands are a key feature of the State Government's bid for Adelaide to become a National Park City. Facilitating further built form development and enabling the commodification of the Park Lands is inconsistent with this ambition.

In 1902, the Adelaide Park Lands inspired the Garden Cities movement through Ebenezer Howard. We should take heart from that inspiration. One of the most liveable cities in the world should not be building on its Park Lands. We should only ever improve parks, make them more beautiful, more rewarding. This is especially so at a time when urban infill in greater Adelaide is increasing, and the wonderful opportunities of the Park Lands are becoming ever more important to the broader community.

In addition, because of the potential impacts on the National Heritage Listing of the Adelaide Park Lands and City, the Board urges the State Government to refer the proposed Riverbank Precinct Code Amendment, Riverbank Arena and commercial car park associated with the new Women's and Children's Hospital to the Australian Government's Minister for the Environment. Such momentous policy proposals and developments deserve consideration as actions which may affect the National Heritage Listing, in accordance with the requirements of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.



Request for Care and Control of Kate Cocks Park to be transferred to the Minister for Health and Wellbeing

ITEM 3.2 14/10/2021
Board Meeting

Author:

Lara Daddow, Acting Associate Director, Park Lands, Policy & Sustainability 8203 7884

2021/01631

Public

Purpose

To seek the Authority's advice to Council and the State Government regarding the Department for Health and Wellbeing's formal request to transfer that section of the Adelaide Park Lands known as Kate Cocks Park (Park 27), currently in the care and control of the City of Adelaide, to the Minister for Health and Wellbeing.

Recommendation

THAT THE ADELAIDE PARK LANDS AUTHORITY ADVISES COUNCIL AND THE STATE GOVERNMENT:

That the Adelaide Park Lands Authority:

1. Acknowledges the benefits of locating the proposed new Women's and Children's hospital adjacent the Royal Adelaide Hospital. However the proposed construction of a large, permanent, multi-storey car park on the Adelaide Park Lands for the new hospital is manifestly inconsistent with both the Adelaide Park Lands Management Strategy and Community Land Management Plan and therefore advises the State Government to provide that facility on a non-Park Lands site.
2. Recommends that the State Government and City of Adelaide cooperatively develop a Master Plan for the Adelaide Park Lands Riverbank Precinct which would allow for a more holistic and contextual consideration of future proposals.

Implications

<p>Adelaide Park Lands Management Strategy 2015-2025</p>	<p>Adelaide Park Lands Management Strategy 2015-2025 The current APLMS does not contemplate:</p> <ul style="list-style-type: none"> • A multi-storey car park in Kate Cocks Park (Park 27) <ul style="list-style-type: none"> ○ Strategy 2.8 only contemplates parking on the Park Lands for Park Lands related recreational purposes, which is to be reduced by 5% in the period to 2025.
<p>APLA 2020-2025 Strategic Plan</p>	<p>Adelaide Park Lands Authority 2020-2025 Strategic Plan APLA's Purpose is stated as: <i>To conserve and enhance the environmental, cultural, recreational, and social importance of the Adelaide Park Lands</i> Guiding Principles for APLA to use are:</p> <ul style="list-style-type: none"> • <i>Preserve and strengthen the integrity of the Adelaide Park Lands</i> • <i>Promote the values of the Park Lands – as Adelaide's defining feature, and an internationally unique asset</i> • <i>Contribute to the delivery of The City of Adelaide's Strategic Plan and vision, and the State Government's 30-year plan for Greater Adelaide.</i>
<p>Policy</p>	<p>Not as a result of this report</p>
<p>Consultation</p>	<p>Not as a result of this report</p>
<p>Resource</p>	<p>Not as a result of this report</p>
<p>Risk / Legal / Legislative</p>	<p>To enable APLA to fulfill its statutory function to provide advice to the Council and State Government on policy, development, heritage or management issues affecting the Adelaide Park Lands.</p>
<p>Opportunities</p>	<p>Not as a result of this report</p>
<p>City of Adelaide Budget Allocation</p>	<p>Not as a result of this report</p>
<p>Life of Project, Service, Initiative or (Expectancy of) Asset</p>	<p>Not as a result of this report</p>
<p>Ongoing Costs (eg maintenance cost)</p>	<p>Not as a result of this report</p>
<p>Other Funding Sources</p>	<p>Not as a result of this report</p>

Discussion

1. In a letter dated 3 September 2021, the Chief Executive of the Department for Health and Wellbeing wrote to the Lord Mayor formally requesting the transfer of the land in the care and control of the City of Adelaide, shown in blue in **Figure 1** (known as Kate Cocks Park (Park 27)).
2. The purpose of the requested transfer, pursuant to section 14 of the *Adelaide Park Lands Act 2005 (SA)*, to the Minister for Health and Wellbeing, is to facilitate the construction of the proposed multi-storey car park for the new Women's and Children's Hospital. The request identifies that the land would remain designated as Adelaide Park Lands, but that it would be occupied by the proposed car park. The rationale for the proposal being to *"realise the excellent opportunity this important project presents to create stronger connections to the Adelaide Park Lands for the benefit of all South Australians"*.
3. Section 14 of the *Adelaide Park Lands Act 2005 (SA)* allows for variations to the Adelaide Park Lands Plan, the instrument which provides for the designation of the custodial arrangements for the Adelaide Park Lands. Under section 14:
 - 3.1. A variation must not be made by virtue of which any land would cease to be included in the Adelaide Park Lands under the plan except in pursuance of a resolution passed by both Houses of Parliament.
 - 3.2. A variation must not be made by virtue of which any land would be placed under the care, control and management of the Adelaide City Council except at the request, or with the concurrence, of the Council.
 - 3.3. A variation must not be made by virtue of which any land would continue to be included in the Adelaide Park Lands but would cease to be under the care, control and management of the Adelaide City Council except at the request, or **with the concurrence, of the Council**.
4. Construction of the proposed multi-storey car park for the new Women's and Children's Hospital on Kate Cocks Park (Park 27) is not contemplated by either the Adelaide Park Lands Management Strategy (APLMS) or the existing Community Land Management Plan (CLMP) for the site.
5. For the area around the Adelaide Gaol, the APLMS envisages an integrated recreational landscape with the Adelaide Gaol and states:
 - 5.1. *"The hub around the Gaol will introduce a number of new activities to increase the attractiveness of the area to a broader range of people. Currently underutilised, the Gaol will undergo adaptive re-use to increase its appeal to park users, which will be reinforced through the creation of new landscaping and improved linkages to Port Road, the Riverbank Precinct and the urban park further north. A well-lit sculpture park, in the area between the Gaol and the new Royal Adelaide Hospital and Riverbank Precinct, will provide for an improved entry statement and greater amenity to highlight the historical significance of this locality."*
6. The Community Land Management Plan for Park 27 states, in relation to the area around the Gaol:
 - 6.1. *"Support the creation of an integrated heritage and cultural hub around the Old Adelaide Gaol, Olive Groves and riverfront through the interpretation of history and heritage through landscapes, artwork and information"*.
7. The proposed car park is also considered to be at variance with the statutory principles in the *Adelaide Park Lands Act 2005 (SA)*. Section 4 of the *Adelaide Park Lands Act 2005 (SA)* contains seven statutory principles which guide the operation of the Act and therefore guide the management of the Park Lands. These principles are summarised as follows.
8. The Adelaide Park Lands should:
 - 8.1. Correspond with the general intention of Colonel William Light's first Plan of Adelaide in 1837.
 - 8.2. Be held for the public benefit of the people of South Australia and be available for their use and enjoyment.
 - 8.3. Reflect and support a diverse range of environmental, cultural, recreational and social values and activities.
 - 8.4. Provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the City.
 - 8.5. Contribute to the natural heritage and improve the biodiversity and sustainability of the Adelaide Plains.
 - 8.6. Be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government.



National Park City (Adelaide) Charter

ITEM 3.3 14/10/2021
Board Meeting

Author:

Lara Daddow, Acting Associate
Director, Park Lands, Policy &
Sustainability 8203 7884

2007/00341

Public

Purpose

To seek the Authority's support for the State Government's bid for Adelaide to become a National Park City by signing the Adelaide National Park City Charter.

Recommendation

That the Adelaide Park Lands Authority:

1. Supports the State Government's bid for Adelaide to become a National Park City.
 2. Be a signatory to the Adelaide National Park City Charter and the Presiding Member provides a letter of support for the National Park City bid to Green Adelaide.
 3. During the current review of the Adelaide Park Lands Management Strategy, consider how to recognise and strengthen the significant role which the Adelaide Park Lands would play in Adelaide being a National Park City (if the State Government's bid is successful during this time).
 4. Integrates the aims of the National Park City Charter into the Board's Strategic Plan (at the next review) should the State Government's bid be successful.
-

Implications

Adelaide Park Lands Management Strategy 2015-2025	Adelaide Park Lands Management Strategy 2015-2025 Should the State Government's bid be successful, the current review of the Adelaide Park Lands Management Strategy would need to consider the significant role which the Adelaide Park Lands would play in Adelaide being a National Park City.
APLA 2020-2025 Strategic Plan	Adelaide Park Lands Authority 2020-2025 Strategic Plan Strategic Plan Alignment – Management and Protection
Policy	Not as a result of this report
Consultation	The State Government has undertaken considerable consultation on the proposal, including with Kaurna.
Resource	Not as a result of this report
Risk / Legal / Legislative	Not as a result of this report
Opportunities	To show public support for the State Government's Adelaide National Park City bid.
City of Adelaide Budget Allocation	Within existing resources
Life of Project, Service, Initiative or (Expectancy of) Asset	Dependant on the outcome of the State Government's bid
Ongoing Costs (eg maintenance cost)	Within existing resources
Other Funding Sources	Not at this stage

Discussion

1. The State Government's '[Adelaide National Park City](#)' bid aims to build awareness of and support for the benefits of living with nature in cities, and to inspire community action to contribute to this.
2. The National Park City Foundation originated in the UK, with London being declared the first National Park City in 2019. National Park City is primarily a movement to improve a city's liveability, through a better connection between people and nature.
3. The State Government, through Green Adelaide, is in the process of applying for Greater Adelaide to be given National Park City status.
4. Other cities with active National Park City bids include Glasgow, Scotland, Newcastle, England and Galway, Ireland.
5. One of the requirements for Adelaide to become a National Park City is to provide evidence of community support for the concept.
6. Green Adelaide has approached councils and other agencies and NGOs in the Green Adelaide Region for support.
7. Based on discussions and advice received through the Environment and Sustainability Network (SA local government staff network), Resilient East and Green Adelaide, the majority of councils in the Green Adelaide region support Adelaide becoming a National Park City. The City of Adelaide has signed the Adelaide National Park City Charter.
8. The [Adelaide National Park City Charter](#) is high-level and consistent with:
 - 8.1. the broad principles of the *Adelaide Park Lands Act 2005 (SA)*, namely:
 - 8.1.1. *the contribution that the Adelaide Park Lands make to the natural heritage of the Adelaide Plains should be recognised, and consideration given to the extent to which initiatives involving the Park Lands can improve the biodiversity and sustainability of the Adelaide Plains;*
 - 8.2. the Vision of the Adelaide Park Lands Management Strategy, namely:
 - 8.2.1. *the Adelaide Park Lands will be a globally recognised park system which surrounds and permeates our city and is central to our identity.*
9. It is therefore recommended that the Board:
 - 9.1. asks the Presiding Member to sign the Adelaide National Park City Charter and send a letter of support to Green Adelaide on its behalf;
 - 9.2. should the State Government's bid be successful during the current review of the Adelaide Park Lands Management Strategy, considers how to recognise and strengthen the significant role which the Adelaide Park Lands would play in Adelaide being a National Park City; and
 - 9.3. should the State Government's bid be successful, integrates the aims of the National Park City Charter into the Board's Strategic Plan (at the next review).

Attachments

Nil

- END OF REPORT -

Stephanie Noble

To whom it may concern

I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Furthermore, green space within urban areas has proven to reduce the urban heat island effect which will be ever more important into the future as this is worsened with climate change. We need to be looking for ways to increase green space and biodiversity within urban areas, not seeking to destroy what little we have left for the sake of development and profit.

Kind regards,
Stephanie

Stephen Francis Larkins

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Stephen Francis

Family name: LARKINS

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am not angry; I am white-hot livid. This Government and their Property lobby donors, aided by a bureaucracy that is conflicted to the eyeballs and has lost its way, know no shame. Nor is there evidence of original thought. Is this some kind of pathetic imitation of the Melbourne and Brisbane Riverbank precincts? The Torrens does not have the width or surface area to make any of what is proposed aesthetically viable in any way shape or form. Now the Torrens will look like an open drain. Congratulations. The moment I hear the words 'Activation', 'Referencing', 'not seriously at variance with' or any of the other disingenuous 'self-interest-drive', doublespeak that the Property lobby is so enamoured of, I know what I am about to read is drivel. Colonel Light's Vision has stood this city in great stead other than to the extent it has been compromised or neglected by previous attempts like this. It has provided our city with the unique attribute of a girdle of parkland. The Property advocates, to whom open space is an anathema, are systematically trying to cannibalise it at an alarming rate, all in the name of unbridled avarice and perpetuation of the unsustainable Ponzi scheme of relentless development. The big questions is where is the capital coming from? It is carpet-bagging of the worst kind - taking something which the proponents had nothing to do with the creation of, then destroying the attributes that made it attractive, then flogging it off and pocketing the proceeds. It's why Australia doesn't have an economy with any depth. The building industry needs to change its business model - it's totally not sustainable. This is about sustainable communities vs greed. Reform - a revolution - is now needed. It needs to go beyond the surface layer and into the bureaucracy. It is clear the current regime will not be happy until we have an urban dystopia. The Government needs to know there will be an electoral price to be paid.

Attachment: No file uploaded

sent to
proponent email: plansasubmissions@sa.gov.au

Steve Trabilsie

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource

Steven Oppes

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Steven

Family name: Oppes

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I strongly oppose any changes to the use of the parklands. The parklands are what make ADELAIDE unique in Australia and are a part of our heritage. They are for the enjoyment of all not just for apartment and business owners and for the profit of developers. Hands off the parklands.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Steven Parker

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Steven

Family name: Parker

Organisation: Steve Parker Audiobooks

Email address| [REDACTED]

Phone number: [REDACTED]

Comments: HELL NO! Adelaide is still beautiful partly because of these restraints set on the greedy developers who want to fill out parklands in with concrete and cafes. Give them an inch and they will take EVERYTHING.

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Attachment 5: No file uploaded

sent to
proponent plansasubmissions@sa.gov.au
email:

Stewart Roper

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Stewart

Family name: Roper

Organisation:

Email address: [REDACTED]

Phone number [REDACTED]

Comments: Parklands are not meant as a cheap land source for continual development till they disappear completely. They are meant to be parklands so leave them alone for all to use. Central Park in New York isn't continually whittled away and nor should our parklands be.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Stewart Sweeney

Dear Planners,

I write to oppose the proposed riverbank planning amendments and to present a more effective, productive and sustainable alternative.

In brief, the riverbank is already over and inappropriately developed, while the CBD is underdeveloped and lacks key and appropriate urban infrastructure.

The proposed riverbank planning amendments are inherently a lose-lose strategy.

On the one hand, the Park Lands will be further eroded, and the riverbank will lose its unique character. Meanwhile, the CBD will lose the potential to cluster economic and social activity, interaction and vitality.

The lure of the 'free' Parklands has for too long eroded actual CBD investment and has contributed to the underdevelopment of city vitality and life. We are on the cusp of a possible final opportunity to readdress this fundamental misdirection of investment that has bedevilled the 19th and 20th centuries.

We should spend the rest of the century improving the ecology, beauty and sustainability of the Park Lands, riverbank and river while focusing all urban development within the actual CBD bounded by north, south, west and east terraces. We should start the above strategy by rejecting the proposed riverbank and associated planning amendments and redirecting proposed developments within the CBD boundaries.

Stewart Sweeney

██████████
██████████
██████████
██████████

Stuart Gifford

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours faithfully,

Stuart Gifford

Sue Fiedler

I do not support putting a carpark, hospital or sports arena in the parklands and the rezoning that is planned to allow these projects to proceed. The parklands are legendary, unique to our state and are being considered for world heritage. Heavily dense building structures such as hospitals, arenas and car parks should be located elsewhere not near the river where biodiversity corridors and green spaces are needed to be restored. Plenty of nearby CBD sites are available that currently have underutilised buildings that could accommodate these facilities. Is a stadium actually required?

Sue Fiedler



Sue Giles

I attach my submission regarding the Riverbank PRecinct Code Amendment

Kind Regards

Sue Giles

Sue Giles

[Redacted]

[Redacted]

Susan Giles

[REDACTED]
[REDACTED]
[REDACTED]
27 October 2021

Submission: Riverbank Precinct Code Amendment

Consultation period: 15 September to 27 October 2021

Feedback sent to: plansasubmissions@sa.gov.au

INTRODUCTION

I am a planner of some 45 years' experience, including over 35 years in State Government, and I support

- a sustainable and democratically based planning system,
- state government and local government accountability, and
- community confidence in decision making.

I strongly support the retention of the Adelaide parklands for free public and community use.

I am very concerned about this rezoning proposal and the speed with which it appears to be proceeding, with very limited consultation.

I do not support rezoning of our renowned public parklands for commercial or private use.

Consultation

I am concerned that the consultation on the proposed Riverbank Precinct Code Amendment, does not comply with the Community Engagement Charter as prescribed under the provisions of the Planning, Development and Infrastructure Act (PDI Act) because the engagement is sufficiently transparent.

The consultation assumes high-level professional planning knowledge, which is unreasonable and has potential to alienate the broader South Australian community. It is likely to discourage some respondents from participating. Many of my highly educated and professional friends and acquaintances have found the draft document and presentation confusing.

In particular it is disingenuous to appear to be retaining the Parklands Zone to the north of the Torrens River, yet introducing a subzone with the name *Riverbank* – the SAME NAME as the Riverbank zone which applies to the land south of the river

There have been insufficient public sessions for something of such significance to the WHOLE of the Adelaide and more broadly, South Australian and even interstate community members. There should have been many sessions, in a range of locations and at different times and days of the week, with plenty of advance notice. Unfortunately, I was unable to attend any of the sessions myself due to earlier commitments.

The consultation is, in effect, an information-only notification to the SA

public dressed up as ‘consultation’. This is not respectful of the community. Indeed, as a practising professional with many years of experience in statutory planning policy amendments it shocks me to observe the apparent disrespect which this process appears to demonstrate.

I note that the FAQs advise that ‘all landowners, occupiers, leaseholders and other relevant stakeholders in the affected area have been directly notified regarding the release of the Riverbank Precinct Code Amendment for public consultation. Traditional Owners of the land within the affected area have also been notified’. Why have they not been engaged before a consultation document was released??

The documentation does not explain the research behind, not the rationale for, these hugely significant amendments. Why do the proposals replace existing desired planning outcomes for the Adelaide Park Lands Zone in the current Planning and Design Code, which was only introduced so recently? The content does not explain why it disregards previous planning and concept reports and does not clarify on what basis the authority to propose changes relies.

The entire Code Amendment document is VERY confusing. It discusses precincts at the start, misleading the reader to think that these are to be the future zones. The tabular analysis of ‘land use analysis, ‘opportunities / issues’ is poorly developed. Simplistic terms like ‘*underutilised space*’ and loaded statements like ‘*Land north of the rail corridor is used for at-grade parking and could provide one of the last remaining large scale development sites along the riverbank*’ make it very clear that this is not a balanced analysis but one with a predetermined outcome.

Naturally Attachment C is confusing to the layperson, as is the entire code. It is drafted for a computer to analyse, not for humans. It does not respect the fact that Planning is a social science requiring human assessment and judgement.

It is evident that this code revision proposal is far advanced. There **has been insufficient staged consultation or engagement with the community seeking to explore the community's broad goals for these areas of the parklands**. This means that the engagement did not occur early enough for the wide range of stakeholders to influence the preparation of draft statutory policy.

Insufficient information is presented about the content of the strategic reviews preceding this proposal, such as Renewal SA and State Planning Commission investigations.

For members of the public not able to access information sessions during business hours, there is insufficient information regarding the visual impact (and specific location) of the area taken up by access and parking, and vague references to the potential use of the two state listed heritage places.

In conclusion, community engagement undertaken after policies have been consulted and drafted with stakeholders is not consistent with the intent of the PDI Act's Community Engagement Charter. This is intended to engage fully on policy formulation, not merely allow comment on height, land use and functions on outcomes that appear to have already been decided.

Public consultation on proposed development applications

The Code amendment material does not clearly communicate that there is and will be no provision for formal public notification of proposed developments in the public interest if rezoning occurs.

Currently Category 1 (no notification) prevails for all significant projects within the Park Lands. This is completely contrary to a democratic process, particularly with respect to land allocated for public use and given that the area is of very significant public interest and civic pride.

Context: The Adelaide Park Lands

I reject most of the Code Amendment partly because it does not seem to recognise, or even acknowledge, the cultural and historical relevance in retaining Park Lands for **public use**.

I disagree with the proposal to rezone riverbank areas as subzones, which will take precedence over the underlying Adelaide Park Lands Zone's Desired Outcomes.

The Code reflects a puzzling attitude and approach by a state government entrusted with the custodianship of the protection of Adelaide Park Lands for our present and future generations.

We all know that the Adelaide Park Lands are unique in Australia, with no known counterparts elsewhere in the world. They provide breathing space and a cooling effect on the city, in the context of a warming climate, in this the hottest, driest Australian capital city.

Not only urban planners, but all residents, are so proud of our start as a planned city; it has served us well, with the wide terraces, our squares and city of Adelaide and North Adelaide - completely encircled by Park Lands, all dating from 1837. I note that the Adelaide Park Lands' uniqueness was recognised in 2008 when they received Australia's highest heritage honour by being included in the National Heritage List.

Our Park Lands are an intrinsic aspect of Adelaide's city design, recognised by the National Heritage List.

The Park Lands have been designated, in perpetuity, to the public.

Yet, over time the area of the Park Lands has reduced from 931 hectares by about a third.

The extent and range of proposed allowable developments will be detrimental to retaining what is recognised as a rare and beautiful town plan with its surrounding open woodland, ovals, sports fields and more formal gardens. The land uses and developments envisaged above are clearly at odds with the Objectives of the Park Lands Zone.

I note that the FAQs advise that the Heritage status of places will not change, but there is no commitment to actually retain the heritage places themselves.

Proposed policy direction

I understand that the proposed rezoning will involve up to 70 hectares of Park Lands space.

It includes the introduction of four new subzones. This is interesting, given that the Code was introduced to minimise the number, and reduce the proliferation, of location specific policy in favour of more generic zoning policy across the State.

I strongly reject the proposed policy changes that will support the development of a wide range of uses not currently permitted, including light industry, accommodation, shops, high rise buildings and land division.

Is land division proposed to facilitate the transfer of the public community's land to private ownership? Why is it proposed? Is this amendment proposed to facilitate another private (casino) development like that on Sydney's public foreshore?

I am very concerned that the proposed Code Amendment is to make it easier for private development interests not only to have the opportunity to develop on public land, but to do so in this prime location without paying the true value of the land. In this way, not only would the SA community lose its precious public space, but **SA taxpayers** will lose the financial value of this land, forever.

I am concerned about the lack of clarity about their policy.

Many of the proposed developments contemplated in the draft subzones are not currently contemplated by the Planning and Design Code and they are inconsistent with existing land uses contemplated by the Adelaide Park Lands Zone. How can a subzone be inconsistent with its overlying zone?

I do not support rezoning that allows

- large multi- storey buildings or residential apartment buildings. (City Riverbank)
- A large indoor Riverbank Arena in Helen Mayo Park (Park 27)
- a multi-storey car park in Kate Cocks site (also Park 27)

The transfer of Park Land areas into the state government's proposed new City Riverbank Zone and the Riverbank Subzone will remove policies which protect the open, accessible landscaped character of the Adelaide Park Lands.

The proposed amendment is contrary to the current planning and design code provisions for the Adelaide Park Lands Zone, which seek the following outcomes:

*A unique **publicly accessible and well-connected open space system** ... that creates a distinctive landscaped park setting for the City of Adelaide*

A range of passive and active recreational activities with a high level of amenity, including a safe and connected walking and cycling network, natural areas, sporting fields and club facilities, formal cultural gardens, public artwork and passive recreation areas, as well as opportunities to support a variety of temporary events, such as festivals, concerts and sporting events.

The focus above is on an **open space system**, providing a range of passive and active recreational activities. The proposed land uses are not supportable.

Because subzone policies generally over-ride zone policies, it appears that the intent is that these sub-zones will negate current provisions for the Adelaide Park Lands Zone.

Health Subzone

I do not object to the use of some of this land for the new Women's and Children's Hospital, on the understanding that there is some return of land that the current W&C's Hospital currently occupies.

I **do not support** the rezoning to allow for a multi storey car park. Both the RAH and the NWCH should be linked into the train service which goes right past their doors. To do otherwise is poor planning and short sighted. Car parking should be integrated within the hospital.

The setting of the state-listed heritage Adelaide Gaol and the Thebarton Police Barracks should not be compromised by the proposed car parking 'transit hub' and its access ways. The area should be developed as a park setting retaining historic olive groves, a very tough and long-lasting Mediterranean species and part of pioneer olive harvesting and food production. Park Land areas north and west of this sub-zone should be retained for passive and active recreation, and ephemeral entertainment events.

It is unclear what sort of bridge is intended between the nWCH and the new car park and the western park lands (Bonython Park and Kate Cocks Park). Is it a pedestrian bridge?

Also, a (maximum?) height of up to 15 building levels is proposed but not detailed in this area. No additional guidance is provided regarding the transition in height from North Terrace developments on the river side of the Terrace towards the western Park Lands. I am advised that the nWCH Master Plan provides graphic images of the scale and setting of the proposed hospital and carparking Transit Hub, but it is not referenced in the Code Amendment.

Riverbank Subzone

I **strongly object to** introducing a new Riverbank Subzone in the Adelaide Park Lands Zone to the southern and northern side of the River Torrens between Kintore Avenue and the Torrens Weir. There is no clarity about what comprises '*appropriate small-scale development such as cafes and shops (both on-water and off-water)*' and there are no clear constraints on them. The concept of '*activating the riverfront*' is very open to interpretation and aiming to protect the open landscaped character and heritage values of Elder Park is insufficient. The open landscaped character and heritage values of the entire area should be protected.

I **strongly object to** the introduction of a wide range of commercial uses, including high rise buildings, land division, shops, serviced apartments, licensed premises, community facilities, tourism accommodation. The words 'high quality and amenity' are meaningless.

I support policy that facilitates pedestrian connections and linkages throughout the precinct.

Entertainment Subzone

I **strongly object to** the rezoning land west of Montefiore Rd from Adelaide Park Lands Zone to City Riverbank Zone (Entertainment Subzone) and a portion of land already in City Riverbank Zone from Health Subzone to Entertainment Subzone, which I understand is to support the development of entertainment related uses, such as an arena.

The policy proposes a height guidance of 20 building levels providing a 'transition in scale towards the river'. Yet, the proposed Adelaide Riverbank Arena illustration consultation material provides no such transition in scale down to the river on Helen Mayo Park (Park 27).

It is important to provide continuity of the walkway through the existing trees on the site of the proposed, which includes a regular Kaurna heritage interpretation tour; we must show respect for Kaurna cultural events, and provide a public walkway to the western park lands. It appears the pedestrian link's amenity through riverside walk would be overcome by the bulk and scale

development of the proposed stadium. Notes about contamination of the railway site ignores the fact that remediation through design is quite possible.

Please note that I **object to the construction of an arena**. The money would be much better spent on public health facilities & resources, and getting people out of poverty, by creating jobs in the northern and southern suburbs and improving public schooling.

The proposed Arena is completely contrary to the intent of the Adelaide Park Lands Act, 2005.

This sub-zone provides a height guidance of 20 building levels providing a 'transition in scale towards the river'. This sub-zone provides a height guidance of 20 building levels providing a 'transition in scale towards the river'. However, the proposed Adelaide Riverbank Arena illustration consultation material provides no such transition in scale down to the river on Helen Mayo Park.

Nor does the Code Amendment detail the fact that the Entertainment Centre, west of the Park Lands and well accessed by rail, tram and train links on Port Road 'replacement' may possibly result in demolition and housing development if the Arena goes ahead at the cost of \$660-700 million cost. There is no cost-benefit analysis of upgrading the existing Entertainment Centre versus the 'Arena'. This is essential background information for the community to make informed comment. This is a very poor trade-off and results in significant increase in the demand for parking close to a Park Lands venue. The proposed Arena is completely contrary to the intent of the Adelaide Park Lands Act, 2005.

Innovation Subzone

The **rationale for rezoning land on /near the Botanic High School**, from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Subzone) **is unclear**. There is no need to rezone land just to reflect existing uses. The whole purpose of zoning is to plan for the future. No reason has been established for the rezoning of this site from Adelaide Park Lands Zone to City Riverbank Zone (Innovation Sub-zone).

How will this proposed policy change provide better integration between the school and the nearby innovation precinct located at Lot Fourteen? It appears that the area of the High School has doubled; there is lack of clarity about uses anticipated / excluded. There are no details of an updated concept plan, nor any clear description of Desired Outcomes. There is insufficient information available to the public.

The existing important open space link 'Frome Park' (located to the immediate south of the high school) between Frome Road and the Adelaide Botanic Gardens is a great boon to the area and should be maintained. It provides a wonderful link between the art gallery / university and the Botanic Gardens, which has impressed our interstate visitors many times (and has led to spending of tourist dollars at all three places). It allows the only access to the west side of the Botanic Garden; and it is used for WOMADELAIDE and other events.

The land between the new Botanic High School and the Lot 14 site, was reclaimed and remediated as Park Lands from an old car park in the late 1990s and is owned by the ACC. The area is a highly significant site for the Kaurna People. I understand that the site contains an authenticated and documented Kaurna Aboriginal burial site; the human remains have been retained in place and

capped. That has been recorded and protected, listed on the Register of Aboriginal Sites and Objects, Aboriginal Heritage Act 1988. It should not be disturbed.

The rezoning puts Frome Park at risk as a transition from open green space to an ancillary area for Lot Fourteen and Botanic High School.

Confidence in policy constraints

I am concerned about the use of the term ‘small scale’ buildings – for example on the Pinky Flat area. Having experience on five development assessment panels I know how difficult it is to define whether a proposal satisfies this criterion. It must be defined through numerical constraints.

I am also concerned that any proposed constraints on, for example, building heights, will not be respected. There is ample recent evidence that height limits are not just ‘cribbed’ but are virtually ignored by local and State Assessment decisions; in this way neither the development industry nor the public can have confidence in numerical provisions within the Code.

Need for the proposed policies

I would argue that many of the proposed developments are allowable under the current policy: for example events are held at Pinky Flat, Elder Park, and Barr Smith Walk under existing planning conditions and revert to open park land areas when not in use. More of the same will not reduce the open landscaped character and heritage values of Elder Park.

Rezoning to allow for the development of yet another sporting / concert arena is unbelievable in the current context. Who is this going to help? We have just been through two years of Covid economic impacts, and we are about to enter a period where there will be great pressure on our public health system and our hospitals. **How can the government justify such expenditure when we do not have enough beds and support for our ambulance system even now? Our top priority should be our public health and education systems.**

CONCLUSION

I do not support the proposed Code Amendment. It is contrary to the public interest. I argue that the Minister for Planning should reject this amendment because:

- The Park Lands provide green and open space, which is a gift to the citizens of South Australia and should not be thrown away for short term financial game by a limited number of individuals
- The government and its instruments like Renewal SA and the State Planning Commission should heed the need to address accelerating climate change impacts, especially on increasing

temperatures and public health. Green open space and vegetation / trees are invaluable in reducing urban heat.

- Open space is increasingly understood to be essential for its intrinsic benefits to biodiversity, human mental and physical well-being.
- We should not waste the wonderful resource that our Park Lands represent. World-best cities value open space for cultural, recreational, and environmental purposes. For example: New York's Central Park, Vienna's Ringstrasse Park, Paris's Tuileries, London's Hyde Park, and Hampstead Heath. Adelaide's Park Lands are unique and need to be protected for the same reasons.
- The proposals are seriously at variance with the statutory principles of the **Adelaide Park Lands Act 2005**.
- The above Act is still in force and as relevant as ever. The State should honour the general intention of Colonel Light's original 1837 Plan of Adelaide, and the parklands should continue to provide **open space** for the benefit of the people of South Australia, and to be available for their use and enjoyment. They should be managed cooperatively and collaboratively for protection and enhancement by the City of Adelaide and State Government.

I am concerned that the overall proposed Code amendment displays an ignorance of the traditional interests and connection with the riverbank area.

In my opinion the proposed Code amendment and the current consultation documentation and process is both disingenuous and unconscionable.

In conclusion I urge the State Government to reach deep into its conscience and reject the proposed Code amendment.

It is the State's responsibility to nurture and protect our parklands and to ensure the lands remain for public open space use.

Thank you for the opportunity to comment on this Code Amendment.

I look forward to your response.

Yours sincerely

Sue Giles B Ec, Grad Dip Town Planning, MPIA

Sue Hammill

We reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world and should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Sue Lang

My 2 cents worth -

I must say I find it hypocritical of the government to tout "Greening Adelaide" and other such talk of climate breakdown awareness, biodiversity concerns, etc. It is sheer green-washing. How can the construction of a baseball stadium, the concept of a Melbourne developer, be of benefit to all the people of Adelaide? What is the carbon footprint of the current construction projects, not to mention future ones? As to the idea that Adelaide should even be considered a National Park City is, if these developments go ahead, laughable. The projects go against the whole concept.

The fact that re-zoning is required only shows that grabbing of free public open park lands for development was never meant to occur. Now, more than ever, we need our park lands - for physical well-being, mental health and the environment.

So, yes, I absolutely stand by the message below and I will not support any person, party or government that takes away our park lands.

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Susan Brame

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Susan Collins (Chair, South West City Community Association Inc)

To Caroline Mealor,

Chief Executive, Attorney-General's Department

C/- Code Amendment Team, Planning and Land Use Services Division

Attached is our Association's submission on this topic, due by 5pm today. Would you please acknowledge receipt in due course.

Yours faithfully

Susan Collins

Chair

South West City Community Association Inc.

[Redacted]

[Redacted]

[Redacted]

27 October 2021

Caroline Mealor,
Chief Executive
Attorney-General's Department

By email: plansasubmissions@sa.gov.au
Code Amendment Team, Planning and Land Use Services Division

Dear Ms Mealor

Submission: Riverbank Precinct Code Amendment: open to feedback until 5pm Wednesday 26 October 2021

South West City Community Association Inc (**SWCCA**) was formed in August 2012 to give a voice to the residents and community in the South West quadrant of the City of Adelaide, in particular regarding the changes to the Development Plan. Over time we have been actively involved with various proposals in this regard and we wish to provide our submission on the above topic which is currently in the consultation period.

As SWCCA represents a large number of residents and community members in the South West City, this submission should not be viewed as one, but as many submissions from the concerned people we represent. ***However, if the Code Amendment Team and your Department takes the view that this is one submission, we at least wish that it to be counted as 6, being the Committee of Management of SWCCA, who endorse this submission.***

The State Government is meant to work with the City of Adelaide (**Council**) to preserve and protect the Park Lands for future generations; not to make them available to developers, and in the South Australian Government's name, for whatever is the latest project. By this amendment the State Government will rob the Council, the custodians of the Park Lands, of even more powers over this tract of land because the Council will be sidelined.

Since 2012 successive State Governments have renamed large areas of the Park Lands allowing for many unsuitable developments to proceed, unfettered. Park Lands should not be treated as free real estate. They are our State's most valuable asset.

The Government is selling, or attempting to sell, assets in the Central Business District (**CBD**), and at the same time encouraging development on the Park Lands to the extent that the existing Riverbank Precinct to the west of Morphett Street Bridge has taken on the appearance of the CBD, while to the south of North Terrace in the area zoned CBD, it contains much smaller low-rise developments. All of the large tall buildings in this area have been built on the Park Lands, not in the CBD. The Park Lands, referred to as the Riverbank Precinct, were rebadged a short 10 years ago and have now been completely infilled with office towers and a difficult-to-access hospital (**RAH**) with more planned for the tiny western tip of Park Lands which has been earmarked for the new Women's and Children's Hospital (**nWCH**).

The *Site Analysis* establishes problems with this new hospital site. It is unsuitable for a number of reasons including:-

- The building footprint is too small, due to the limitations of the proposed location.
- The site and the eventual building will be difficult for pedestrian and vehicles to access due to its isolation.
- It is located under the flight path which restricts design and increases build costs.
- It is not conveniently located to public transport.
- Proposed required additional facilities (car parking and office space) will add significantly to the cost of the project and resemble a shopping centre when built, severely impacting State Heritage buildings, the old Adelaide Gaol and Police Barracks, and will destroy the State Heritage olive grove.

The nWCH will be situated beyond West Terrace, yet the documentation quotes it is “*near the railway station*” and intimates it is close to other transport. The Station is a great distance East of the site, and the tram does not stop nearby – this site is between tram stops.

This is not free land for the taking. Increased construction costs as a result of the difficult site will quickly surpass the perceived savings in land costs. Had the Government purchased the Coca-Cola Site on Port Road, a much cheaper hospital with superior access and containing the required additional office space and car parking, with close and easy access to all modes of transport including tram, bus and taxi, could have been built - and all of this would be outside the Park Lands.

Under *Code Policy Review* (from the Consultation Pack) on Pages 29/30 it provides:-

“The City Riverbank Zone and Entertainment Subzone provides specific guidance on built form and relationship. The City Riverbank Zone Desired Outcomes note that development should be of:

‘DO1 – Exemplary design quality and architecture that is contemporary and innovative and respectful of...Adelaide Park Lands setting...’

The Entertainment Subzone recognises the importance of minimising the impact of built form on the River Torrens, specifically identifying the following guiding policy:

‘PO 2.3 – Buildings adjacent to the River Torrens are designed to provide an active edge to the river and are of a low scale commensurate with its landscape setting’.”

The proposed Amendment spruiks that small scale, sensitive, sympathetic and quality design will blend new developments well with the natural riverbank setting. However, if the 27-storey office tower and Casino Hotel already located in this zone are 2 examples of this benchmark, or what we can expect in the future as sensitive development, what will not be suitable or not accepted? We remind the Minister that there is no development that is superior to a natural riverbank setting.

There are a lot of statements made throughout the documents provided for this consultation implying that the proposed rezoning will have little impact on the area involved. For instance, in the *Engagement Plan; Key messages; General*, the last dot-point provides:-

“While the Code Amendment will result in a change of zoning for some of the affected area (see maps), the land will be retained in the park lands under the Adelaide Park Lands Act 2005, consistent with other areas in the City Riverbank Zone. This means that any proposal to change the land use will require a separate process, as outlined under the Act.”

Has this point been included to make it appear that we have not lost another 70 hectares of Park Lands? It seems incongruent that the Riverbank Precinct Zone is still referred to in the documentation as "Park Lands". The existing Precinct has been totally built out, with developments built on every square metre of space. It has gone from open space and rail yards to total infill.

There seems to be a total disconnect with this Government - and its predecessor - from the:-

- voting public;
- most liveable city;
- effects of Climate Change;
- loss of green open space;
- aspirations of the Kaurana People;
- impact of infill on the precious space remaining.

The total focus on development and profits - above all else - is destroying the appeal that made Adelaide a great place in which to live. This additional loss of Park Lands indicates that the Government does not understand where it is, and what is important to Adelaide, its community and visitors, and the State of South Australia.

The previous Government campaigned strongly and proudly on what they had built on the (Park Lands) Riverbank Precinct and their intention to "... Continue to redevelop the Great Riverbank Precinct..." Then they lost the election. However, the current Government has rapidly progressed the rampant consumption of the newly created Precinct to the point that infrastructure completely fills the area, and they are now proposing to greatly increase that area to allow for more inappropriate out-of-scale development.

The Your Say documentation states the following:-

*"Riverbank Precinct Code Amendment
What's being decided?"*

SWCCA believes it could be not only the demise of the CBD, but also the results of the next election. We hear from our community that destroying the Park Lands is not a vote-winner.

The Park Lands were not gifted to the people of South Australia to provide future developers and the custodians with multiple free development sites. Colonel William Light's intentions with his city layout was to provide Adelaide with what we now realise was a futuristic setting in which to live surrounded by nature. At a time when the true value of green open space is being realised world-wide, we have a misguided administration embarking on a quest to build out another 70 hectares of this precious asset.

The Your Say documentation provides that new development should be climate-ready. No new development will have more impact on Climate Change than that provided by an open Park Lands setting – it is already climate-ready.

Over time the Park Lands have been diminished, but since 2012 the consumption has increased at an alarming rate. The creation of the Riverbank Precinct accelerated this process; we can only imagine what will happen to our green belt if it is diminished by a further 70 hectares.

Since successive governments and planning departments have worked together to utilise the Park Lands for all future development, whilst selling off assets in the CBD, the City has become a poorer place to live, as a result.

The community has been alienated from the planning process over time so that little credence is devoted to opinions raised by people living, working in, or visiting the City. In particular we note that local residents are consulted under the *Charter Principles* and are made aware of Code amendments, but there are 2 different levels of treatment; 1 for them and another for the stakeholders (*Engagement Plan* document). The fact that only Adelaide West End Association is listed as a stakeholder indicates the total disconnect the Government and Planning Section has with the SA community they are meant to represent. This proposed amendment will impact everybody in the State of South Australia as well as visitors, both now and into the future.

If this Code Amendment goes ahead as it is, the list of land uses proposed for the Amendment will be almost identical to the *CBD Capital City Zone* listings, and will enable almost any development proposal to be rubber-stamped without consultation and without any recourse to challenge.

From the *Draft Amendment* we have extracted the following list of land uses which detail what is, and will be, allowed in the re-zoned area:-

- (a) Advertisement
- (b) Arena
- (c) Community centre
- (d) Consulting room
- (e) Office
- (f) Convention centre
- (g) Educational establishment
- (h) Entertainment venue
- (i) Helicopter landing facility
- (j) Hospital
- (k) Hotel
- (l) Licensed premises in association with hotel, restaurant, shop or the like *(this will be struck out)
- (m) Land division
- (n) Light industry (including high technology and research based activity)
- (o) Pre-school
- (p) Shop
- (q) Serviced apartments
- (r) Tourist accommodation.

..... We should all be very afraid.....

We are horrified it appears that our First Nation People were not consulted about this proposal and that due care and consideration was not given to sites of significance within this area.

In 2012 we were told: “...*Vibrant Torrens on the way...*” and we waited. The expected vibrancy from that time has not resulted by rezoning the Park Lands. The new developments have provided for very little activation in the Park Lands; unless you have a specific reason for attending, you would not go there. What the Government spruiked to promote the Riverbank Precinct from the start, and the reality of what has been built, are miles apart. From the Convention Centre West nothing has been built that makes the area more vibrant or provides anyone a reason to visit, tourists included.

Let us take a look at what has been achieved by this development-focused planning reform process in a relatively short period of time. We provide a list of what has been built, or is about to be built, on the existing Riverbank Precinct:-

- 1 expensive hard-to-access hospital (RAH) built under the flight path;

- 3 office towers (SAMRI, UniSA etc) with 1 more, even bigger (Walker Tower), about to be built;
- 3 buildings that morphed westwards and now constitute a mammoth Convention Centre filling in the entire block;
- 1 high-end hotel attached to the Casino;
- Adelaide Botanic High School.

These are all buildings that would have been more appropriately sited within the CBD.

To add to this list another even less-accessible hospital (nWCH) that will need a separate shopping-centre-like carpark and offices, both of which are required to make the hospital viable, with new roadways and access, but built separately because there is no room to accommodate them in the hospital site itself.

- And apparently, we are also going to get a 15,000-seat arena.
Again, all more appropriately sited in the CBD.

We already have an underutilised CBD. PlanSA's solution appears to provide people with even fewer reasons to visit there. By selling off assets in the CBD and concentrating all new development for the last 10 years in the Park Lands, PlanSA has become a major contributor to the demise of the CBD. The Planning Code policy of 'spot' rezoning to provide for new developments on an ad hoc basis is creating a chaotic city layout.

In the *Adelaide Riverbank – Annual Report 2017-18*, it states that the Riverbank apparently covers 380 hectares of land. So, it would appear that this Amendment is just the first of many zoning amendments to come.

What will have been lost? Hectares of Park Lands and open space that provided vistas toward North Adelaide, clean air, heat dissipation, and a beautiful natural space in which to relax and for people to gather.

The consumption of the City's Park Lands by development must be stopped to preserve the amenity of this unique open space for people visiting and living in the City. If you want the City to remain liveable you must put the community that use the City and its Park Lands before what is a land grab. The economy will survive without sacrificing our precious Park Lands, and we can ensure that they are kept in trust for future generations.

Planning Reform deregulation and manipulation of zoning to achieve desired outcomes is turning the City and the surrounding Park Lands into a concrete jungle and is impacting negatively on communities throughout the State who now have no confidence in what can be built in their vicinity or on their Park Lands.

SWCCA reserves the right to be heard at any public hearings on this topic.

Susan Collins
Chair
South West City Community Association Inc.

Susan Marsden

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Other

Given name: Susan

Family name: Marsden

Organisation: Member, Professional Historians Australia

Email address [REDACTED]

Phone number: [REDACTED]

Comments: Since SA.s first Surveyor General laid out the city and Park Lands only public buildings and community uses eg Government House and two universities have been placed on the Park Lands, and mostly in the section between North Terrace and the Torrens. These amendments will end for all time that distinction between the public and the private city and remove general public enjoyment of the open space, see also Marsden, Stark and Sumerling, Heritage of the City of Adelaide, 1996.

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sent to proponent email: plansasubmissions@sa.gov.au

Susan O'Neill

Do you recall seeing multiple black swans on the Torrens River in this area in recent years? I don't but I recall them from ten years ago. The re-zoning and re-use has already seen noise pollution and real water pollution. As exemplified by the attached.

Loss of green space results in death of fauna and flora and that is unacceptable.

Re-zoning of the old RAH saw the death of 100 year old trees where ducks, possums and birds lived.

I therefore reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Many thanks

Susan O'Neill

Video attached with submission of the river.

Susan Rennison

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Susan

Family name: Rennison

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I am opposed to the various rezoning proposals, especially the creation of new Riverbank Subzone which extends to include the River Torrens both northern and southern banks (including Helen Mayo Park). The government has for years pushed for increasing housing density along arterial roads and inner city suburbs. People are forced to live in smaller accommodation, with smaller gardens, courtyards or perhaps only balconies for private space. This makes the provision of wide open, undeveloped public spaces with long vistas, essential to mental health of the community. People need space in which to contemplate, and renew their spirit. This government needs to value and respect the heritage of the parklands area that is unique to Adelaide. It has been upgraded from time to time e.g. to provide better walking paths and access to facilities. Trees must not be valued only in economic terms – in dollars or as dressed lumber. Trees that have taken decades or centuries to grow, provide the essential restorative power of nature that we all need as a tonic for the increasingly pressured urban lifestyle that Adelaide is becoming. We do not need a regimented, sanitised form of nature. Increased development will decrease wildlife, bird, butterfly and insect life - already under threat along the Torrens River and over the metropolitan area. In contrast, see our Japanese Garden in the South Parklands. Japanese culture values the informal, and the uniqueness of . . . individual rocks, flowers, trees, etc, pathways that wander, and where diversity is valued. Nature is by definition, chaotic and it is the contemplation of the unexpected that brings balm to our frenetic, pressurised western lifestyle. I do not think an Active Waterfront Precinct is needed and I am opposed to the building of a further entertainment stadium in this area, which will increase traffic and parking issues. We already have suitable venues spread around the suburbs. Why continue to centralise?

sent to
proponent
email: plansasubmissions@sa.gov.au

Susan Rooney Harding

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Susan

Family name: RooneyHarding

Organisation:

Email address| [REDACTED]

Phone number [REDACTED]

Comments: I do not support the re-zoning i=of the river Bank Precinct in the Adelaide CBD.
Leave the Park Lands and the River Bank alone - This is not your land to Re-Zone, it is the Public Land or indeed Kauna Land - What do they have to say about this?

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sent to
proponent plansasubmissions@sa.gov.au
email:

Susan Schott

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: susan

Family name: schott

Organisation:

Email address [REDACTED]

Phone number: [REDACTED]

Comments: I am totally opposed to any further reasoning of parklands around Adelaide. My reasons for this are: too much parkland and "green space" has been lost already across Adelaide to the detriment of flora and fauna, the character and heritage of our city, our quality of life and the overall visual appeal of Adelaide. Things we should all cherish and preserve. COVID-19 has demonstrated the need for undeveloped "green space" for people to have some space and solitude, especially people residing in high rise buildings such as city apartment. During lockdowns this is very important. Scientists have told us that by 2050 large, over developed cities such as Sydney will be "unliveable" due to high temperatures associated with climate change. Have we learnt nothing from this? Adelaide has its parkland "lungs" and we should be increasing them, not reducing them, especially for inappropriate development that is not necessary (more cafes). Issues around increased traffic, both pedestrian and vehicular, parking (already a problem), noise, destruction of habitat (particularly bird life). In closing, I make the point that there are still many of us who still highly value the river Torrens precinct as a place of peace and natural beauty in the middle of the city. It is, however, very sad for us to see this wonderful legacy left to us by our city founders now being eroded at such an alarming rate. Obviously, our city founders had the foresight that we do not. Please leave the parklands alone for future generations to enjoy.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Suzanne Gebhardt

Adelaide is famous for its beautiful Parklands that encircle the city and as a South Australian I love this part of Adelaide and enjoy the amenity of this green space whenever I am there.

I reject the Government's so-called "vision" for the Adelaide Park Lands.

Open Green Public Spaces do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage.

Suzanne Gebhardt

██████████

██████

S.A 5173

Suzie Bourne

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Suzie Bourne

Suzie McCusker

I reject the re-zoning of any part of the Adelaide Park Lands.

The inner suburbs nearby are being infilled with higher density living, reducing the number of trees for our native bird life and softening the greenhouse effect. This area needs to remain green. It is used and enjoyed not only by the wildlife but so many use it for recreational walking, jogging and cycling. We regularly walk this area for its natural beauty and our connection to nature to revitalise. Its proximity means we can incorporate nature into our busy family life.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

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Many areas of the Park Lands have been lost to development over recent decades and the current rezoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Sincerely Suzie

Suzie McCusker

Suzie Moss

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please respect our heritage parkland.

Sylvia White

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Sylvia

Family name: White

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Leave all our parklands as they are now. NO BUILDING ANYTHING ON THEM OF A COMMERCIAL NATURE please.

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sent to proponent email: plansasubmissions@sa.gov.au

Taliesin Attrill

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Regards,

Taliesin Attrill

Ted Jennings

To whom it may concern,

I reject the re-zoning the 'Riverbank precinct' or any other part of Adelaide's world Unique Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace (death by a thousand cuts) Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world, by acre Adelaide's Park Lands are bigger than the Iconic New York Central Park.

It is horrible that public parks are viewed as wasted space. They should be valued a like an air conditioner on a 43 degree day and not sacrificed as if it were merely a vacant development site(s). On my commute from Glenside to the CDB and return (by bicycle) through the forest on Pakapakanthi/Victoria Park (Park 16), the temperature difference on a hot summers afternoon is indescribable (2nd only to riding from the CDB up Hewitt ave Rose Park.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands, accelerating the loss of this priceless resource.

My aim in life is to leave the planet in better condition than I was born into, I do this by; commuting by bike and teaching my children to be not dependent on fossil fuelled cars, volunteering, organising clean up Australia days, working as an enrolled nurse, home composting, having a large solar system on my roof (battery coming soon when the price is not so cost intensive) and only having one car in my family.

Kind regards, Ted Jennings [REDACTED]

[REDACTED]

[REDACTED]

Tess Crotti

Submission one:

To Whom it May Concern,

Adelaide's Park Lands are a unique asset that should be protected at all costs.

That is why the Park Lands are registered on the National Heritage List.

It is reprehensible for governments, at any level, to allow any part of the Park Lands to be removed and used for other purposes.

The Adelaide City Council and the SA Government should be doing all they can to preserve what is left of the Park Lands - whether degraded or not - not chipping away large chunks for developments that can occur elsewhere.

I Say an emphatic NO to the proposed Riverbank Code Amendment.

Tess Crotti.

Submission two:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Tessa

Family name: Crotti

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Adelaide's Park Lands are a unique asset that need protection. That is why the Park Lands are registered on the National Heritage List. It is reprehensible for any level of government to allow any part of the Park Lands to be removed. The Adelaide City Council and the SA Government should be doing all they can to preserve what is left. I Say NO to the proposed code amendment.

sent to proponent email: plansasubmissions@sa.gov.au

Tessa Price Brooks

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Tessa

Family name: PriceBrooks

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: To whom it may concern, It is of the upmost importance that the parklands remain intact as Colonel Light planned for. Too much of this valuable space - which makes us one of the most liveable cities in the world has already been chipped away at. This new plan is also in direct contradiction with the 2005 Adelaide parklands act. The space is already highly used and regularly activated. The rezoning should not go ahead not only to protect the parklands now but into the future.

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sent to
proponent email: plansasubmissions@sa.gov.au

Thomas Wright

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Tiffany Bolton

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Tim Gunn

I am writing to object most strenuously to the proposed rezoning of the parklands adjacent the Torrens River.

The parklands are Adelaide's star attraction to residents and tourists and probably investors too, particularly as green issues are likely to continue to escalate in importance, nationally and internationally. The parklands are what distinguishes Adelaide from other capital cities, not only here in Australia but also abroad.

I have travelled widely and no other city I have visited comes close to matching what Adelaide already has. It is already "world-class". In fact, it is in a class of its own and the better for it. Covering sections of the parklands with concrete and glass will surely diminish Adelaide's stature in the world, not enhance it.

Specifically, I oppose cafes and shops being erected on the southern and northern sides of the Torrens between Kintore Avenue and the Torrens Weir – there are already plenty of those in the CBD and many are already on the brink. Further competition will likely lead to closure of some of them.

The arena does not need to be built the area to the west of Montefiore Road, if at all. If it is essential (which I doubt – and it clear from community posts that many others share my view), less sensitive areas, outside the parklands, should be investigated. I do not agree with Steve Marshall's view that this area of the parklands is degraded and so not worthy of preservation.

The proposed car park for the WCH should not be built on the olive grove and surrounding area. Surely this can be located underground.

The proposals for the Innovation subzone look fine insofar as they do not encroach on the parklands and are simply replacing space already built on.

However, most of the subzoning proposals are out of order and reflect short-termism and an unwarranted prioritisation of development over community interests.

Please take steps to safeguard this asset for the enjoyment of all Adelaide residents and for future generations.

Yours sincerely,

Tim Gunn

[REDACTED]

[REDACTED]

Tim Marriage

Submission one:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: tim

Family name: marriage

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please retain parkland as open space. The proposed "Vision" is misguided and should not sell out to commercial interests as it will be only short term gains. The Hyatt should never have been built on parklands and the subsequent rot of commercial interests has just intensified the long term degradation of this precious and unique city treasure. There does not need development to make the parklands 'vibrant' they're doing just fine as they are. I oppose the Vision.

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sent to
proponent
email: plansasubmissions@sa.gov.au

Submission two:

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Tim

Family name: Marriage

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I oppose absolutely and completely the erosion of the parklands...particularly for commercial purposes. It undermines the green belt and character of the city as well as making it hotter and less livable. Efforts should instead be made to return existing buildings back to green space.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Submission three:

Hi Keian and Rachel

Just a brief note to stay keep up the good work fighting the erosion and so called 'vision' of Adelaide's erosion of the parklands.

Just how many hotels and gambling institutions does a riverbank need to be 'revitalised'?

I was so pleasantly surprised that the most died in the wool liberal friend and multi million dollar Adelaide business owner of mine lamented Marshalls folly of a second stadium on the parklands and is openly voting otherwise. "It's something no one needs" he said "while the ambulances ramp. It's such a blight on not only the liberal governments and our own state's legacy". Wow. The tide is certainly turning against the cancer of the private use of the parklands. Never mind about the world heritage listing we are risking. Great places to live need green spaces so please Keian and Rachel do all you can to block this misguided mindset. In particular can we:

- Have no more development on the riverbanks. It's a nice place to walk without walking through concrete.
- The Hyatt should never have been build. Don't renew it's lease or the hotel in the stadium... and the casinos... well don't get me started.
- The increasingly during covid and post popular recreational competitive cycling movement needs gov/ council support to give back vic park criterium track and fence it. Head of the lease should not be Motorsport but Cycling Australia. It's the only cycling criterium track in Adelaide. Sports rorts may or may not be alive within the liberal government but send the COVID tent to somewhere more appropriate (if it has to be on the parklands make it on the old netball courts so people can que down Anzac highway or on the cricket pitches opposite the hospital) as it's a couple of years now so no longer 'temporary'. Yes grumpy but can you can you imagine if a Covid station was set up on the only golf course or cricket pitch or even god forbid on Adelaide oval. You've only got to look at the rest of the cycling world to see how it's opened up and we are to restrict not only the TDU 2022 but also to restrict the festival of cycling criterium because we have no parklands left. It's an international laughing stock.
- Open Green Public Spaces everywhere in the parklands. The private schools do not have a right to them..leave them alone.. they do not need re-zoning.

Large new buildings should go in the CBD, not on the priceless garland of Park Lands that is Adelaide's unique heritage. If the government/ Adelaide council had balls of Light then they would use their rezoning rules to encourage development around the centre of the city ie Vic square. Not on north terrace/ Rundle street.

Also just wondering if anyone has any other ideas or people to petition on how we can help transform this misguided mindset on the so called vision.

Thanks for your time

Tim Marriage

██████████

Wayville SA

Tim Rettig

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Tim

Family name: Rettig

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do not support the proposal in any shape or form.

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sent to proponent email: plansasubmissions@sa.gov.au

Tim Walsh

I reject the proposed re-zoning of the Adelaide Park Lands.

The only exception I would support is if it were to make viable a plan to locate the Women's & Children's Hospital to adjoin the current RAH

The Riverbank does not need activation – it is flexible enough to allow for passing festivals, at other times it is a place of quiet retreat within the city, used daily by residents and visitors.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Tim Walsh
Adelaide

Toby Brandenburg

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Toby

Family name: Brandenburg

Organisation: Flinders St. Housing co-op

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Hi all, considering the large amounts of money and business/job involvement involved with this project should it go ahead - I'm not sure how much this community consult will change the outcome if at all; I would like to propose however that the Torrens river be entirely filled in, as it could be used for valuable parking spaces which could provide a lucrative ongoing revenue stream for council. The eastern parklands may as well permanently become an entertainment district for expensive restaurants, And southern parklands kick everybody out and just leave Veale gardens, surrounded by vast arrays of appartments, each which a view to the rose garden. Eventually there will be nobody left within a 2-5km radius from Adelaide city centre who isn't earning a 6-figure salary And the unsightly 'working class' who perform in our festivals and tend our restaurants, bars and sporting facilities, Can all be relocated to the far Northern suburbs. Wishing council and government their best in their endeavours to mitigate blame, and slowly diminish the public parklands, which privatising the profits. Hopefully New York city comes to their senses and installs a world class sporting and entertainment precinct in the North Eastern corner of central park. Regards Toby

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sent to
proponent email: plansasubmissions@sa.gov.au

Tom Chladek (Botanic Gardens and State Herbarium)

To whom it may concern

Please find attached correspondence from the Board of the Botanic Gardens and State Herbarium's Presiding Member, Judy Potter.

Best wishes

Tom

Tom Chladek

On behalf of the Presiding Member of the Board of the Botanic Gardens and State Herbarium

The information in this e-mail may be confidential and/or legally privileged. Use or disclosure of the information to anyone other than the intended recipient is prohibited and may be unlawful. If you have received this email in error please advise by return email.



Board of the
Botanic Gardens and
State Herbarium

North Terrace, Adelaide
South Australia 5000
botanicgardens.sa.gov.au
Telephone: (08) 8222 9320
Fax: (08) 8222 9301

27 October 2021

Attorney-General's Department
GPO Box 464
ADELAIDE SA 5000
Email: plansasubmissions@sa.gov.au

To whom it may concern

Re: Submission – Riverbank Precinct Code Amendment

On behalf of the Board of the Botanic Gardens and State Herbarium we write regarding the recent the recent consultation on the Riverbank Precinct Code Amendment.

The Board has noted that Precinct 3 (the Innovation Precinct) will create a focal point of the east end, with a focus on innovation, education, research and tourism – all values that closely align with our institution's strategic aims.

We trust that these amendments will have a positive impact on the Riverbank Precinct and we are pleased to read that the Innovation Precinct will ensure pedestrian and open space links are maintained between Frome Road and Adelaide Botanic Garden. This space is vital green space, which attracts visitors from the Adelaide Botanic High School, neighbouring universities and the Lot Fourteen precinct.

I trust that this information is of assistance.

Yours sincerely

Judy Potter
Presiding Member
Board of the Botanic Gardens and State Herbarium

Michael Harvey
Director
Botanic Gardens and State Herbarium



Government
of South Australia

Tony Curtis

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Tony

Family name: Curtis

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: 1. The proposed riverbank rezoning fails to recognise the cultural and heritage values of the parklands and how they contribute to Adelaide being listed as one the worlds most liveable cities. 2. The parklands are not free land, they are bound in our cultural identity and as such must be protected. 3. Heritage sites eg the gaol should be treated as such and not be open to demolition or repurposing in the future. Suggestions: 4. I'm not opposed to a new W&CH we clearly need one and given the location of the new RAH it makes sense, however any carpark needs to be incorporated into the building design, not as a separate building. 5. Buildings however small should not be allowed on the northern side of the lake, most of the charm/amenitty looking toward the oval is the open tree lined riverbank. 6. The proposed stadium should be relocated to the Coca Cola/SA Brewery site and be suitable for 25,000 (including soccer) saving the investment in Hindmarsh. Demolition of the Entertainment Centre would provide parking space.

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sent to
proponent email: plansasubmissions@sa.gov.au

Tony Leviston

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Tony

Family name: Leviston

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The proposed Code Amendment is unnecessary and should NOT proceed. The value of the Adelaide Park Lands is as open space, without development. All of the open spaces in the Adelaide Park Lands are valuable, not just Elder Park. There should be NO expansion of the City Riverbank Precinct, nor the creation of a new Riverbank Subzone, nor expansion of existing Subzones. Temporary use of the Adelaide Park Lands for festivals, such as the current and popular Oz Asia Festival which has used Elder Park and Pinky Flat, are a better use of the Park Lands rather than permanent development. The Old Adelaide Gaol and Police Barracks heritage places should be kept completely separate to the Health Subzone. The Women's and Children's Hospital carpark (if the hospital must be located here) should be built over the railway line rather than expanding the City Riverbank Zone west of the railway line and taking valuable Adelaide Park Lands. The development of the Adelaide Convention Centre over the railway lines shows this is clearly possible.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Tracey Shorter Davies

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: tracey

Family name: shorter davies

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: And once this wonderful piece of nature is gone its gone forever! Why is this Govt hell bent on destroying our riverfront All for capital gain! We are blessed with parklands surrounding our city , it was the view of our forefathers and home land of our indigenous folk yet these idiots in Govt can only think of ways to commercialise it ☐.... As someone who regularly drove into the pinky flat and parklands / botanic area from Brighton to walk my great danes im appalled that this whole area is under consideration for ' destruction' . I love walking around the riverbank and green areas/pathways winter, summer taking in the simple beauty with my Danes. I can guarantee those who say its a great idea would rarely ever use this area regularly... Steven Marshall Vickie Chapman MP etc do you use the parklands regularly ? Bet you don't !!! There are plenty of bars, cafes , shops very close by without destroying these areas and the birds/ animals that call the area home. What is wrong with people , these areas are a quiet serene beautiful drawcard and respite for Adelaide - why do you need to fill in every bit of land for commercialisation. And as for a basketball stadium - you have really lost the plot- money that is needed else where to actually benefit ALL of us not a few. All i see is a group of pollies who are more concerned and invested in making a name for themselves with thinking they are leaving Adelaide looking better and trying to be something we are not. Btw who allows a huge ugly structure to overshadow Parliament House ☐☐☐☐, if anyone bothered to look most countries don't do that but regard their parliament buildings more highly. We can create better more imaginative structures and public areas in Adelaide than in the manner being used in some areas and considered - lets not be a mirror image of any other capital city. Protect our green spaces before its too late . No parklands desecration for commercialisation!

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sent to
proponent
email: plansasubmissions@sa.gov.au

Tricia Rabbitt

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Kind Regards

Tricia Rabbitt

████████████████████

██

Trish Russell

I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Please save our precious park lands.

Yours sincerely

Trish Russell

Tristan Avella-O'Brien

To whom it may concern,

I object in the strongest terms to the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Further, research has strongly demonstrated the need to maintain green space in cities for human well-being and the persistence of native wildlife. Adelaide already has little tree cover compared to other capital cities and redevelopment will reduce the green areas that are already functioning in this way. We cannot afford to continue the incremental taking over of green space by grey built structures and surfaces.

If this development proposal continues, it will force me and my community to vote away from Liberal at the next election.

Sincerely,
Tristan Avella-O'Brien

Tsun Wu

Please keep it as a green space and plant more trees. It's what makes Adelaide nice!

Regards,

Tsun

Valdis Dunis

Dear Plan SA,

This opposition is to lodge my opposition to the re-zoning of any part of our Adelaide Parklands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace open green and public spaces in each one of the four targeted zones.

Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world.

It should be valued as such, not sacrificed as if it were merely vacant development sites. There are many underused blocks of land nearby that are much better suited for stadiums, hospitals, car parks and apartment towers.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing another big 10% area of the parklands - accelerating the loss of this priceless resource.

Could you please confirm receipt of my submission.

Thank you.

Regards,

Valdis.

[REDACTED]

[REDACTED]

[REDACTED]

Vashti Janzen

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Vashti

Family name: janzen

Organisation:

Email address| [REDACTED]

Phone number: [REDACTED]

Comments: Please. Leave our natural parklands alone. Not everything needs to be built up and on! In years to come natural spaces will be more valuable. These are not YOUR parklands. They belong to everyone. Stop building on them!

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sent to
proponent plansasubmissions@sa.gov.au
email:

Vedat Erdem

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Venita Weir

"I reject the re-zoning of any part of the Adelaide Park Lands. If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones. Adelaide's figure-eight of Park Lands garlanding both the City and North Adelaide is a treasure found in no other city in the world. It should be valued as such, not sacrificed as if it were merely vacant development sites. Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Vicki Heinrich

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Vicki

Family name: Heinrich

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Park land and green space implies and should be restricted to a natural non built environment of vegetation that is grass and trees. Not buildings, carparks or high rises. The appeal and boast of Adelaide is it's parklands around the city. Greenspace, parklands and gardens are vital for peoples wellbeing and mental health (there is plenty of literature that shows the value). They provide open spaces where people can be immersed in nature, birds, insects and other wildlife can flourish in the the city environment and opportunities for people to exercise as well. Particularly in these covid times, being able to experience nature and the natural environment is vital to people's well being when they otherwise may not have access to private greenspace (i.e., gardens), having public space it even more important. Developments like community gardens and expanding the botanic gardens would be in keeping with the park lands. Not high rises and development of buildings, car parks and other large cement structures.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Vicky Chartres

"I reject the re-zoning of any part of the Adelaide Park Lands.

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It should be valued as such, not sacrificed as if it were merely vacant development sites.

Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Yours sincerely
Inner city resident

Sent from my iPhone

Violet May Rowe

Written submission on the
RIVERBANK PRECINCT
PLANNING AND DESIGN CODE AMENDMENT



To the Chief Executive of the Attorney-General's Department by close of business Friday 22 October 2021.

- Post: GPO Box 1815, Adelaide SA 5001 OR Email: plansasubmissions@sa.gov.au

NOTE: Your submission will be published on the PlanSA website. Personal addresses, email and phone numbers will not be published, however names and company details will be.

Submitter Details (required)

Name: VIOLET MAY ROWE

Organisation Name (where relevant):

Address:

Email:

Phone:

Note: the details supplied above will be recorded as the person / organisation who lodged the submission

Comments / submission details (please attach additional pages and / or supporting documents as required)

THE ADELAIDE PARKLANDS ARE A NATIONAL TREASURE
THAT BELONG TO THE PEOPLE.

SUCCESSIVE GOVERNMENTS OVER THE YEARS HAVE
ALREADY ENCRONCHED ON THE PARKLANDS.
THE DEVELOPMENT THAT IS PROPOSED IS UTTERLEY
INAPPROPRIATE!

IF THIS ILLEGAL AND UNDEMOCRATIC PLAN GOES
AHEAD IT WILL FOLLOW THAT THE REST OF
THE PARKLANDS WILL BE UNDER SIEGE.

WE SHOULD NOT HAVE TO FIGHT THE GOVERNMENT
TO RETAIN OUR HERITAGE.

IT IS ABUSE OF POWER TO RE-ZONE THIS AREA.
I HAVE NO CONFIDENCE IN EITHER THE LIBERAL OR
LABOUR PARTY TO PROTECT HERITAGE IN THIS STATE!
WE NEED MORE INDEPENDENTS TO KEEP
DEMOCRACY ALIVE AND PROTECT US FROM
GREEDY DEVELOPERS.

#17641907

Page 1 / 2

Virginia Munro

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Virginia

Family name: Munro

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: I do not agree with the proposal. I do not think any of the parklands should be rezoned. This will ultimately mean the parklands are further chopped up and built on, changing the character of the city forever. Can you imagine building a be carpark on Central Park? Also if WCH needs to be built near the RAH, plan it north of the RAH over the railway. Same with entertainment zone, put it over the railway. Try to be innovative. And return the old WCH site to a park

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sent to
proponent email: plansasubmissions@sa.gov.au

Viviana Nunez Zeballos Garcia

"I reject the re-zoning of any part of the Adelaide Park Lands.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Wai Cheong

"I reject the re-zoning of any part of the Adelaide Park Lands.

If Parks are re-zoned for other purposes then they will lose their character as Parks. Re-zoning for the proposed purposes of entertainment, innovation, health etc would allow multiple developments over coming years to gradually replace Open Green Public spaces in each one of the four targeted zones.

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Many areas of the Park Lands have been lost to development over recent decades and the current re-zoning proposal would have the effect of diminishing much further the Open Green Public areas of Park Lands - accelerating the loss of this priceless resource.

Wai Cheong

Wendy Campbell

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Wendy

Family name: Campbell

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: There has been more than enough development along the riverside with concrete covering much of the southern side along the promenade. Pinky flat is an oasis of green belt on the northern side that brings the natural world into the city and softens the ugly, harsh built structures behind it. Given the issues with climate change and global warming, especially in a hot place like Adelaide, it is refreshing and necessary to maintain more natural green space wherever we can. The local fauna take advantage of this area especially during the hot days of summer and we humans also gather there. Leave Pinky Flat alone. Stop trying to ingratiate yourselves with the commercial business side of town and give ordinary people, tax payers and voters, not to mention flora and fauna, a thought. We are fed up with governments developing for the sake of doing something and leaving their mark. How about letting nature leave it's mark on our environment for a change.

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sent to
proponent plansasubmissions@sa.gov.au
email:

Wendy Egan

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Wendy

Family name: Egan

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Hi, I am appalled at the proposed plans for the use of the riverbank parklands adjacent the Festival Theatre and Playhouse Theatre and Pinky Flat. Precious green space will be lost forever, leave it alone and leave the irreplaceable trees alone. This is public space for use during festivals and events allowing the general public to partake in free events and daily social activities. Pop up events are all that is needed here. The government is in for a huge downfall if they proceed on the plans for an entertainment complex, and to allow permanent structures on Pinky Flat.

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sent to
proponent email: plansasubmissions@sa.gov.au

Wendy Fuller

I strongly object to any more zoning changes to open space in our city parklands. This space was designed originally for "the people" and should remain entirely for that use. Public use does not require admission and should be open for multiple uses and casual exercise and picnic and quiet spaces. We are the envy of many cities and your proposed changes will change the character of our green belt forever. It also opens up opportunity for more eroding of our green spaces, our grandchildren's heritage at risk.

Sincerely,

Wendy Fuller

Koolunga 5464

Wendy Wright

Regarding this plan to build on water and on the olive grove, why don't you use real innovative architectural collaboration to improve what we already have for greater sustainability and less high rise grandiosity.

We don't need our rivers and trees destroyed by your private career plans and business alliances. One would think that as architectural graduates, you would reach back into the heritage of real architectural innovation, and harness the grandeur of the sun, the light, the natural elements, and real design, instead of demolition and manic showing off, using public property that has been treasured for generations and makes Adelaide, Adelaide.

Wilfrid Prest AM

I welcome the opportunity to register my concern that the current proposed amendment to the Riverbank Precinct Zoning would permit even further built development on Adelaide's parklands. It seems to me that much more use should be made of airspace currently available above the current railway lines to the west of the Adelaide Railway Stations (along similar lines to developments in Melbourne, Chicago and other cities) , before any further alienation of currently green open parklands is contemplated. By the same token, the need for proposed additional car-parking adjacent to the new Women's and Children's Hospital should be accommodated by excavating an underground car-parking facility. Of course these options will be more expensive in the short term, but in the longer term alienated parkland is lost to all future generations of South Australians.

There are numerous well-known environmental and public health considerations which should preclude any further degradation of Adelaide's unique parkland heritage, especially given the prevalence of potential alternative development sites in what is still a relatively low-density CBD.

Kind regards

Wilfrid Prest AM

████████████████████

████████████████████

William & Kerry Wood

The State Government Planning Department

We are quite horrified at the idea that you would want to build on Adelaide's parklands, especially around the river. We do not want you to turn our river precinct into another Southbank like Melbourne. Melbourne's Southbank was put in the centre of the built up area, and there are still parklands along the Yarra.

We enjoy walking along the river in peaceful park surroundings.

We absolutely disagree with this proposal and hope sensible members of your government will throw it out.

If you must use the parklands, surely some of the southern areas that are less used would be better.

On top of your new planning rules which are allowing the destruction of so many lovely old homes, this is just awful. Have any government members driven along Fullarton Road lately? This streetscape is being dominated by grey and white, characterless square boxes, with more to come. We are becoming very disillusioned with the Liberals these days.

William and Kerry Wood

██████████
████████████████████

Wilson Feltus

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Wilson

Family name: Feltus

Organisation: Member of Public

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: The existence of the public open spaces of the River Torrens waterfront precinct are integral to the cultural value of the parkland. This is particularly the case with the Pinky Flat area which is a unique part of the River Torrens precinct. The area containing establish shade trees and grass, is readily accessible from the city, and has views over water to the city skyline. The introduction of private commercial facilities into this space will significantly degrade the unique value of this area of parklands. Adelaide already has multiple established and developing areas within the city that are entertainment precincts with small bars and cafes, (Hindley St and the adjacent lanes, Waymouth St, Rundle St, Gouger St, O'Connell St, Hutt St). If additional areas are required there many areas close to the city with existing tram and/or pedestrian access where this type of development could be further encouraged, (Melbourne St, Kent Town, Hindmarsh, Bowden, Thebarton). Using existing parkland to establish a new area for bars and cafes, both degrades the public amenity of the parkland and reduces the viability of the established areas. These are established areas where businesses have invested and developed in good faith in appropriately zones precincts. The long-term strategy for the Adelaide parkland should endeavour to return commercial or industrial development within the parkland to public usage. The parkland should not be granted for commercial development. The parkland is very valuable land and granting it to commercial entities provides benefits over competitor entities that have invested in appropriately zoned land. Existing public space parkland should not be used for the construction of permanent facilities if alternative developed sites exist. Infrastructure that is essential to be located within the area (for example boat sheds) should repurpose spaces that are already developed. The area west of Morphett Street Bridge on both sides of the river is current

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sent to
proponent plansasubmissions@sa.gov.au
email:

Comments

General

The long-term strategy for the Adelaide parkland should endeavour to return commercial or industrial development within the parkland to public usage. The parkland should not be granted for commercial development. The parkland is very valuable land and granting it to commercial entities provides benefits over competitor entities that have invested in appropriately zoned land. Existing public space parkland should not be used for the construction of permanent facilities if alternative developed sites exist. Infrastructure that is essential to be located within the area (for example boat sheds) should repurpose spaces that are already developed.

Active Water Front Precinct

The existence of the public open spaces of the River Torrens waterfront precinct are integral to the cultural value of the parkland. This is particularly the case with the Pinky Flat area which is a unique part of the River Torrens precinct. The area containing establish shade trees and grass, is readily accessible from the city, and has views over water to the city skyline. The introduction of private commercial facilities into this space will significantly degrade the unique value of this area of parklands.

Adelaide already has multiple established and developing areas within the city that are entertainment precincts with small bars and cafes, (Hindley St and the adjacent lanes, Waymouth St, Rundle St, Gouger St, O'Connell St, Hutt St). If additional areas are required there many areas close to the city with existing tram and/or pedestrian access where this type of development could be further encouraged, (Melbourne St, Kent Town, Hindmarsh, Bowden, Thebarton).

Using existing parkland to establish a new area for bars and cafes, both degrades the public amenity of the parkland and reduces the viability of the established areas. These are established areas where businesses have invested and developed in good faith in appropriately zones precincts.

Entertainment Precinct

The area west of Morphett Street Bridge on both sides of the river is currently parkland with limited accessibility to, and usage by, the public. The area has been degraded as public space with the main uses as open carpark and boat sheds. Public use of the area will remain limited due to the impassable southern boundary formed by the rail corridor, and the lack of a destination to encourage pedestrian through traffic.

Rezoning the area is unlikely to substantially increase public usage without providing connectivity over the rail corridor to the RAH and beyond to the Tram line, Bonython Park, Karen Rolton Oval, and the Adelaide Gaol historic site. This connectivity could be achieved by incorporating walkways and footbridges to link the proposed children's hospital and the western end of the RAH, with this parkland and the weir.

The connections need to be to the riverside of the railway corridor as well as the RAH.

Innovation Precinct

The Adelaide Botanic High School as an education facility would be more appropriate to include with the adjacent university. Including the school in the Innovation Precinct appear to have the sole purpose of rezoning the 'Frome Park' open space immediately south of the school.

YiZhong Zhuang

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: YiZhong

Family name: Zhuang

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: Please ensure there is a dedicated and separated cycling path through this area.

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sent to proponent email: plansasubmissions@sa.gov.au

Yuri Poetzl

Hi

My name is Yuri Poetzl

Please find attached my submission in relation to the Riverbank Precinct Code Amendment

Thank you

Yuri Poetzl

[REDACTED]

[REDACTED]

Images of Helen Mayo Park, below



The Adelaide Parklands have long been for everyone, including visitors from interstate and overseas. Our Parklands are a valuable natural asset, which should remain accessible to everyone.

The rezoning of both sides of the Torrens River from Bonython Park to Botanic park to allow commercial buildings and multistory private residence, goes against the original purpose of the Parklands and appears to be an excessive land grab. Adelaide City Council has voted against the rezoning proposal.

Would New York City residents accept the rezoning of Central Park, allowing wide spread, high rise private developments? Would Londoners accept the privatization of Hyde Park?

There is a perception among the community that our elected members and senior public servants are beholden to developers and realtors.

The Eastern states have banned developers, development consultants and realtors from holding positions on development assessment panels. How many of our Planning Commission members, SCAP (State Commission Assessment Panellists) and senior public servants would still hold their positions, if SA adopted similar laws?

The poor public perception of our elected members is reinforced, when a key driver of the Riverbank rezoning proposal, our Attorney General is currently under investigation for possible conflicts of

interest. If our most senior law official is found to have acted improperly, what bearing does that have on the credibility of the Attorney General and their involvement with the Riverbank scheme?

Witnessing some of our most senior elected members regularly drinking and partying into the late hours, undermines their credibility and raises questions of their priorities and capability to uphold their duties.



Is it really more important to have \$662 million sports arena, before fixing our inadequate health services and appalling ambulance ramping issue?

Will the proposed new Women's and Children's Hospital be large enough to meet the needs of an expanding population?

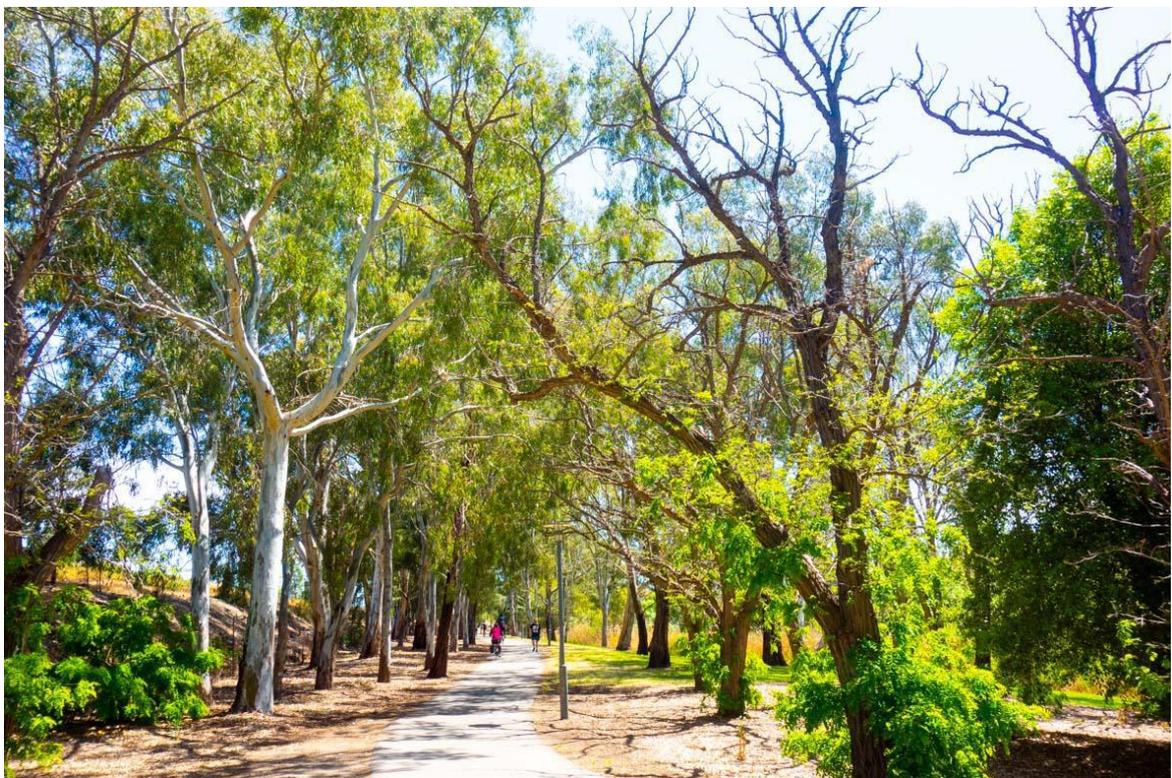
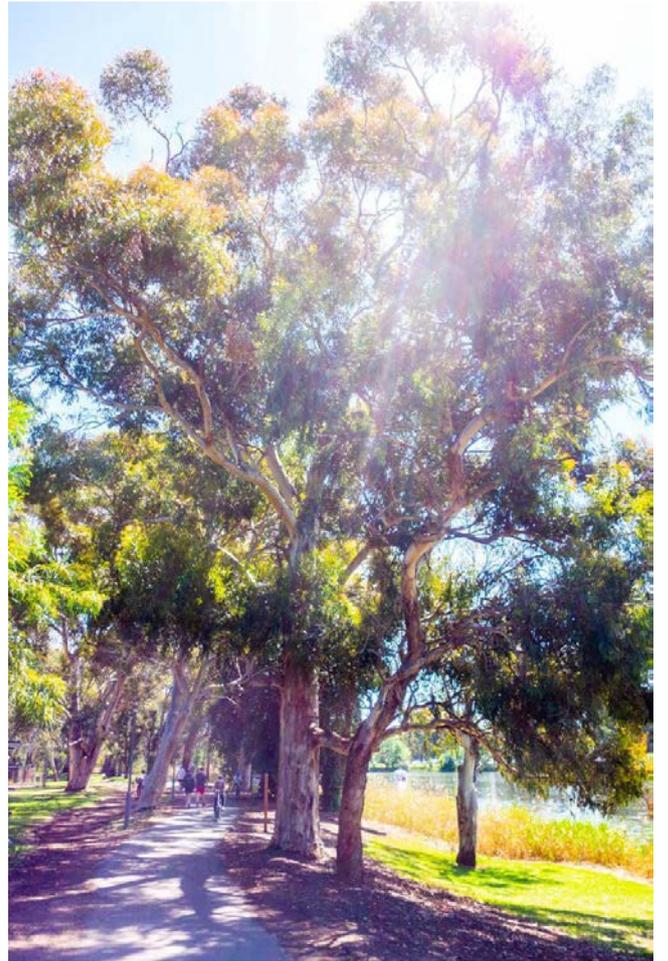
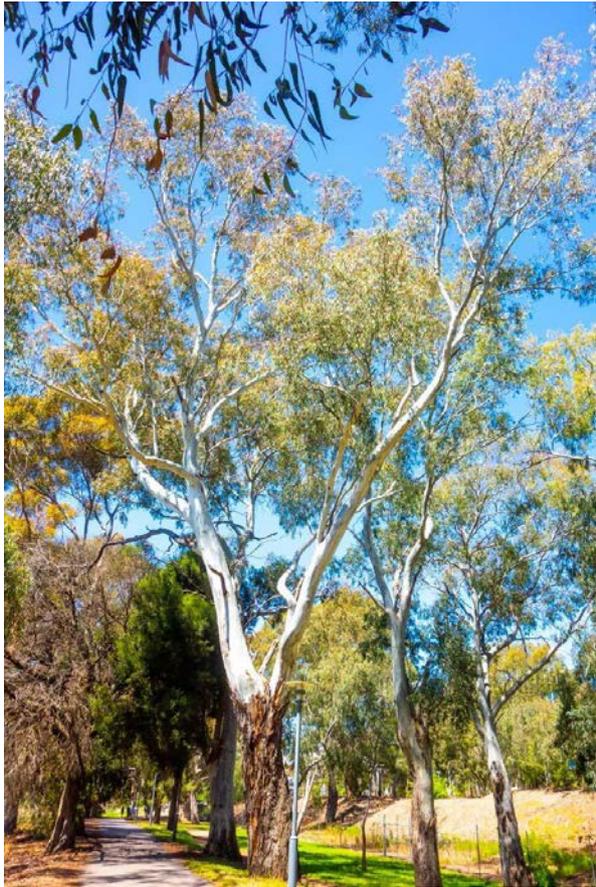
The trees currently at the proposed hospital site were planted to offset Significant and Regulated tree losses incurred for the new RAH. Those recent plantings are unprotected and now face the chop. In a recent Conservation Council Report it was found that Adelaide had a net loss of 75,000 trees, in the space of a year. This suggests that SA's tree protection laws are wholly inadequate.

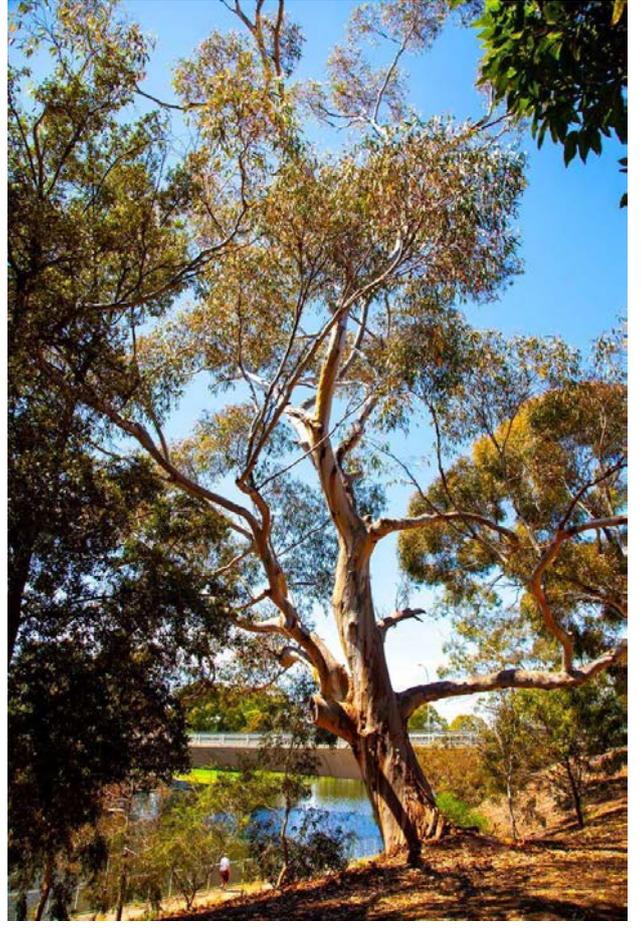
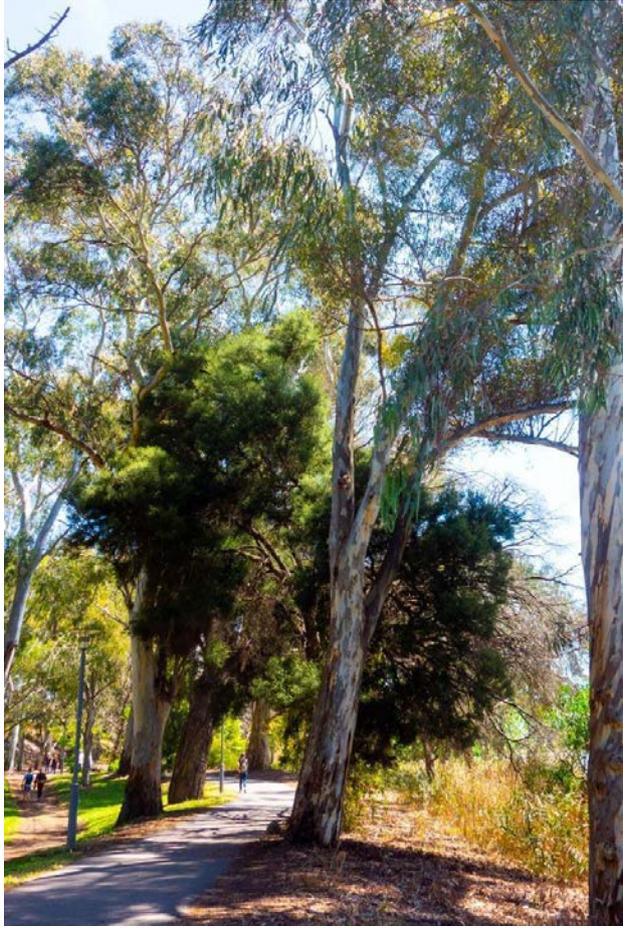
As evident in attached photos, large sections of the Helen Mayo park are healthy and not in need of remediation. Many Regulated native trees appear to be in the way of the new stadium proposal and likely to be destroyed

The acknowledgements and recognition of the Kurna peoples custodianship of the Adelaide Plains which precede official meetings, by and large appears to be nothing more than hollow lip service.

Yuri Poetzl
Christies Beach South Australia 5165







Yvette van Berkel

PlanSA,

Submission Details

Amendment: Riverbank Precinct Code Amendment

Customer type: Member of the public

Given name: Yvette

Family name: van Berkel

Organisation:

Email address: [REDACTED]

Phone number: [REDACTED]

Comments: It is vitally important to maintain the parklands and their national parks heritage status - as green spaces for all of the public to enjoy. The Riverbank Arena, Womens and Childrens Hospital development, and most concerningly, a car park (!) do not in any way fit this use and do not benefit all of the public in preserving green space for their enjoyment and mental and physical wellbeing. These important developments should be planned and implmented, yes, but not on parklands. Green land and parks are not free real estate begging to have buildings on them. And why do we want these things right in the city? Particularly hospitals are better placed outside of the (outside covid) congested CBD area where better parking facilities can be co-placed without impact on green space and creating further congestion. Same for the arena - activate other suburbs! I am comfortable with the activation proposals for the torrens and innovation code amendment changes as these seem to ensure longevity of the parklands and increase usage without impacting the character and intention of the parklands - so separate these and progress, and consider listening to everyone who is saying the parklands are part of what makes Adelaide special and look at how the major developments can be delivered elsewhere where they can add value to other parts of Adelaide and leave the parklands for what they are intended. Thank you for the opportunity to provide feedback.

Attachment: No file uploaded

sent to
proponent
email: plansasubmissions@sa.gov.au

Yvette van Eenennaam (Adelaide BioMed City)

Dear Sir/Madam,

Please find attached the response of Adelaide BioMed City Partners on the Riverbank Precinct Code Amendment.

Kind regards,

Yvette van Eenennaam

General Manager, Adelaide BioMed City

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██████████
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To Whom It May Concern,

Thank you for providing us with the opportunity to respond to the draft planning code amendment for the Riverbank Precinct. We have consulted with all Adelaide BioMed City (ABMC) partners (The South Australian Health and Medical Research Institute (SAHMRI), The University of Adelaide, University of South Australia, Flinders University, The Royal Adelaide Hospital (RAH) and The Women's and Children's Hospital (WCH)) to produce an aligned collective response.

The Adelaide BioMed City Board appreciates the absolute requirement for well-connected infrastructure to achieve full delivery potential from an health innovation district. This of course includes the connections of buildings and social spaces with paths, walkways and bridges, but also extends to the internal structure of buildings. Allowing for multi-disciplinary working spaces and research, academic and clinical facilities that provide space to embed industry. All of these factors organically support the development of large-scale multi-disciplinary projects that have access to industry and commercialisation pipelines to turn discoveries into tangible improved health outcomes.

Furthermore, innovation districts greatly benefit from connectivity to neighbouring districts, resulting in infrastructure, expertise and knowledge sharing, beneficial to the entire neighbourhood, accelerating discovery and translation across many co-localised industries.

**“Innovation districts constitute the ultimate mash-up of entrepreneurs and educational institutions, start-ups and schools, mixed-use development and medical innovations, bike-sharing and bankable investments - all connected by transit, powered by clean energy, wired for digital technology, and fueled by caffeine”
Bruce Katz and Julie Wager,
The Brookings Institution 2017”**

Adelaide BioMed City is supportive of most aspects of the proposed amendment. The proposed changes enable the development of the nWCH which is a key element to the expansion of the district. The adjacent proposed Entertainment Zone supports the expansion and activation of additional areas adjacent to the biomedical district, as does the Active Waterfront proposal, consistent with enhancing opportunities adjacent to ABMC.

Feedback on the proposed code amendment is provided below:

The Collective (ABMC):

- Believes that the code amendment could be more prescriptive regarding the intent to enhance access and connectivity between the CBD and the park lands (including over the railway lines). It is suggested to increase the scope to develop over the railway to ensure the plan effectively improves connection between city and parklands.
- Emphasises that for the ABMC Health Innovation District to thrive, it is integral to improve connectivity with other innovation areas, such as:
 - Connectivity with Lot Fourteen Innovation District via pathways, bike lanes and road
 - Connectivity and access to parking, active transport pathways and public transport, including the Adelaide Railway Station. The partners emphasise the value of an accessible rail platform on the west side, to allow for a short commute to the Royal Adelaide Hospital and the new Women's and Children's Hospital

- Connectivity with the Parklands via a footpath for patients of the RAH and WCH to access the green space and to improve employee access to recreational areas in the parklands
- Suggests that it would be beneficial to include the area over the railway lines to the north of ABMC as part of the Entertainment sub-zone to increase the range of permitted uses for future developments, thereby increasing the likelihood that these future developments will improve connection between ABMC and the parklands.
- Is supportive of the inclusion of the Gaol and Barracks sites as it would give rise to possible expansion/allied industry investment opportunities in the future.
- Notes that there is little detail relating to the frequent use of the word 'access' that would allay the common issues raised in a consultation such as this one. Significant detail on the public transport and parking infrastructure to be improved is necessary. The SA community (including staff and patients) have diverse needs and I am not sure this is entirely reflected in this amendment. The focus on walkways, cycling, ability, bridges and leisure is appreciated, however commitment to making this work for the whole community will be important.
- Suggests that given the current environment perhaps reference to the experiences we have had living with a global pandemic, and how this will shape and influence how we plan, develop and live in the future.
- Is strongly supportive of the proposed WCH car park development as an essential improvement for patients and their families to access required health services.

Thank you again for the opportunity to provide feedback on the proposed Riverbank Planning Code Amendment. We trust that you will find this feedback helpful and we sincerely hope that ABMC's vision is shared by the majority of your stakeholders.

We are keen to engage further with the team and provide deeper insights related to the feedback provided here. Please do not hesitate to reach out if you'd like any additional information or have any comments or queries.

Kind regards,
On behalf of The Adelaide Biomed City Board,

Yvette van Eenennaam

Zis Ginos

Dear Sir / Madam,

Just a short note to express our opposition to the proposed rezoning of park lands areas in the above.

More specifically both sides of the Torrens that adjoins North Tce.

Apart from ruining the open nature of this area the intention to provide commercial uses is beyond belief.

Many of the uses intended already exist in the City and North Adelaide and quite a lot are suffering financial hardship – and not just from Covid – due to a lack of patrons.

Surely if more are required there is ample room in the CBD for such uses AND for multistorey Apartments that are envisaged on the South side of the Torrens.

Don't spoil the uniqueness of Adelaide by trying to make it into a Melbourne or Brisbane.

Regards,

Zis Ginos

Ginos Group

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Kurna Yerta Aboriginal Corporation RNTBC)



Kurna Yerta Aboriginal Corporation RNTBC

11th November 2021

Anita Allen
Director, Planning and Development
Attorney-General's Department
Government of South Australia

Via email: [REDACTED]

Dear Anita

Re: Riverbank Precinct Plan Code Amendment

I am writing on behalf of the Board of the Kurna Yerta Aboriginal Corporation RNTBC (KYAC) regarding the proposed Riverbank Precinct Code Amendment.

KYAC is the registered native title body corporate for the Kurna Peoples determination of native title handed down by the Federal Court on 21st March 2018. The determination and the associated Indigenous Land Use Agreement (ILUA) with the State Government, recognises Kurna People as the native title holders of the Adelaide region, being the First Peoples of the lands and waters on which the City of Adelaide has developed. The determination recognises our laws and customs and our continuing connection to country – to our yerta.

The KYAC Board note that the Code Amendment has been initiated by the Chief Executive of the Attorney General's Department with the approval of the Minister for Planning and Local Government, in accordance with Section 73(2)(b) of the *Planning Development and Infrastructure Act 2016* (the Act). The reasoning for the Riverbank Precinct Code Amendment includes, for example, to:

- improve accessibility and connectivity and activation of the Riverbank
- improve built form outcomes
- consider the land use needs of the new Women's and Children's Hospital
- enable appropriate entertainment-related land uses north of the railway line

This is proposed to be enabled through the Code Amendment to change zoning for some areas of the Riverbank Precinct, while still being retained in the park lands under the *Adelaide Park Lands Act 2005* (SA).

As the State Government is aware, the River Torrens to Kurna is *Karrawirra Pari*, our *Red Gum Forest River*. It is an important part of yerta, our cultural landscape and the ongoing relationship and obligations between Kurna people, culture and country. *Karrawirra Pari* has mythological and spiritual significance for Kurna people. It also has many other cultural values through being a water and food source, providing resources for objects, being a place to live and camp, a place for ceremony and a place where our ancestors are laid to rest.

As the native title determination recognises, Kurna are the First Peoples with a continuous connection to our country on which Adelaide has been built. Development, however, has come at a cost for Kurna People. Furthermore, ongoing development continues to further damage our country, our important places and our old people. Through our peak body in KYAC, Kurna meyunna need to be part of future development to shape the growth of Adelaide in a manner which recognises, protects, and celebrates Kurna culture and country. We need to walk and work together.

KYAC do not consider that an appropriate process of engagement between Kurna and the State Government has occurred in relation to the Code Amendment and some of the proposed developments of the Riverbank Precinct. Firstly, in March this year we had Premier Steven Marshall announce the proposed construction of Riverbank Arena. Not only was there no prior consultation with Kurna, but the cultural significance of the location was dismissed through referring to this important place as a site full of weeds. Progress six months, and the Code Amendment is released to enable the various developments including the Riverbank Arena. Again, Kurna were not afforded an opportunity to consider this proposal prior to public consultation. We expect a stronger, open and more collaborative relationship with the State Government regarding major planning and developments across Kurna yerta. Kurna are not simply another stakeholder alongside say businesses and broader community.

KYAC has nevertheless had the opportunity to review the Code Amendment as part of the consultation process. As Chairperson, I had the opportunity to meet with the Minister for Planning and Local Government, Hon Vickie Chapman MP, and the KYAC Board has met with yourself as Director Planning and Development (Attorney General's Department). We appreciate these opportunities to discuss and clarify aspects of the proposal. Kurna representatives have also had discussions with the Green Adelaide Board and the Adelaide City Council. Given timeframes, we have not had the opportunity to engage as we would have liked with our membership.

The position of the KYAC Board is to not support the Code Amendment as it is currently proposed. KYAC view elements of the proposal as inconsistent with Kurna cultural values, and our vision for Adelaide City to maintain and enhance cultural and environmental values. We see the Riverbank Precinct as an important part of this vision, being an essential green space within the centre of Adelaide to express Kurna culture to residents and visitors and to restore and improve environmental values. This is consistent with Adelaide Park Lands strategy and also the proposal for Adelaide to be recognised as a National Park City -which KYAC has endorsed.

KYAC does, however, understand the desire of the State Government to progress the Code Amendment to ensure that the planning framework supports some key developments, including the new Women's and Children's Hospital (nWCH). Thus, in good faith, we put forward through this submission our position regarding each of the key zoning changes and our requests to revise the Code Amendment. We also acknowledge that any associated developments would still be required to comply with approval processes and requirements under the *Aboriginal Heritage Act 1988 (SA)*.

Health and Biomedical Precinct

KYAC support the proposed zoning to allow for linkages to the nWCH (including car parking) and broader health precinct. We also support repurposing of the heritage listed buildings in the Old Adelaide Gaol and Police Barracks. However, we submit that this be directed by a community engagement and planning process to identify preferred uses in keeping with heritage values, the community interests in this area and proximity to key health services. Some of these identified uses may fall outside the current proposed health zoning. Kurna People must also be part of this process, and afforded the opportunity to identify uses which align with Kurna interests and opportunities.

Entertainment Precinct

The location of the proposed Riverbank Arena is on a cultural heritage site. While being part of the broader cultural values of *Karrawirra Pari*, the area also has particular significance for Kurna men. There will no doubt be mixed views amongst Kurna people as to the appropriateness of constructing the proposed facility in this location. Further discussion with the Kurna community, including pursuant to the *Aboriginal Heritage Act*, will be required prior to the development. The proposed Entertainment Zone over this area adjoins the banks of *Karrawirra Pari*, which again has high cultural heritage values. However, KYAC is willing to support the zoning changes and subsequent development of the Riverbank Arena on the expectation that:

- a buffer is retained as green space between the Riverbank Arena footprint and *Karrawirra Pari*. Consideration should be given to reducing the zone to remove the narrow extension to the west and moving the northern boundary to the south to provide for a river-side corridor.
- Kurna People, our culture, our country is celebrated and expressed in built form and otherwise in the development and operation of the Riverbank Arena.
- There is ongoing compliance with requirements under the *Aboriginal Heritage Act*.

Innovation Precinct

The rezoning of the Innovation Precinct to include the Adelaide Botanic High School is supported. However, given the cultural heritage values of the lands to the north of the proposed zone, we request that the northern boundary be aligned with the extent of the current built form to maintain this area as Park Lands.

Waterfront Precinct

The proposed introduction of the Riverbank Precinct zone is the most concerning for KYAC. This area is of particular cultural significance for Kurna people taking in places such as Pinky Flat. It is also an area of open space, that enables Kurna people to still feel and nurture culture and country. It includes lands and waters which we hope to enrich and restore through cultural and environmental restoration such as developing wetlands, walking trails and interpretation. It is a place to reflect, a

place of uniqueness, a place for family and community. It is vital that such cultural, environmental and community values are maintained and enhanced.

The rezoning appears to open this area up for what is described as small scale development including cafes, shops and licenced premises. KYAC submit that this precinct should be retained as open space and development be far more restricted than what is proposed. The Riverbank Precinct zoning should not allow any further built form development on the northern side of the River (beside redevelopment within current built area footprint). This area should be set aside as green space and for cultural and environmental enhancement. On the south side of the River, our strong view is that development is limited to the redevelopment of existing facilities. In the alternative, development needs to be limited in form, scale and purpose in keeping with Kurna cultural values and community recreation and enjoyment of this area. Furthermore, Kurna engagement needs to occur in planning process with opportunities for Kurna enterprise and wealth creation.

KYAC welcomes the opportunity to provide a submission to the proposed Code Amendment. We thank the Department and the Minister for meeting with Kurna representatives and providing an extension of time for KYAC to make this submission. In the future, we hope that a more collaborative, open relationship can be established between KYAC and the State Government. A leader-to-leader dialogue on matters of mutual interest will help identify and shape positive outcomes for all.

We look forward to working more closely with the you in the future on planning and development initiatives. Please do not hesitate in contacting the KYAC Board should you wish to discuss anything further.

Yours sincerely



Jeffrey Newchurch
Chairperson