



27 October 2021

Code Amendment Team
Planning and Land Use Services Division
Attorney-General's Department
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Riverbank Precinct Code Amendment

Dear Sir/Madam,

The Australian Institute of Landscape Architects, South Australian Chapter (AILA SA) has reviewed the proposed Code Amendments to the *Planning, Development and Infrastructure Act (2016)* for the Riverbank Precinct.

We thank the State Government for the opportunity to provide our assessment and recommendations of the proposed Code Amendments.

Our assessment is that the outcomes of the proposed Code Amendments are unclear and require more clarity, against the endorsed (and current) *Adelaide Park Lands Management Strategy 2015-2025*, which is the governing strategy for the *Adelaide Park Lands Authority*, established under the provisions of the *Adelaide Park Lands Act 2005*.

Our submission outlines feedback relating to the following:

1. Relevance of and lack of acknowledgement of the *Adelaide Park Lands Management Strategy 2015-2025* in the Code Amendment
2. New Women's and Children's Hospital and Code Amendment
3. Riverbank and broader urban design issues

1. Relevance and lack of acknowledgement of the current and endorsed (by the City of Adelaide and the State Government) *Adelaide Park Lands Management Strategy (APLMS) 2015-2025* in the Code Amendment

AILA SA supports development in the Adelaide Park Lands that is consistent with the values outlined in the *Adelaide Park Lands Management Strategy 2015-2025 (APLMS)*, which is a requirement under the *Adelaide Park Lands Act 2005* (the Act).

The Act:

- *'...establish(es) 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'*

The APLMS can be found here.

We note that there isn't any reference in the proposed changes or in any of the Plan SA engagement documents on the importance and currency of the APLMS, which was developed by the City of Adelaide and the State Government through the Adelaide Park Lands Authority (APLA).

AILA SA supports the seven objectives of the APLMS - that any development must ensure that the Park Lands are: Responsive, Iconic, Inclusive, Accessible, Enriching, Diverse and Resilient. These are the objectives aligned with the principles of the *Adelaide Park Lands Act 2005*.



The APLMS acknowledges the significance and importance of the Park Lands to Adelaide and the role it has and plays in helping to create one of the most liveable cities in the world.

The APLMS also recognises that any change to the Park Lands needs to take a balanced approach to a diverse range of environmental, cultural, recreational, and social values and activities.

There is little evidence the APLMS has been used as the current and endorsed master plan for the Adelaide Park Lands in the preparation of the Code Amendment.

AILA SA is concerned that the 'key objectives' and zone changes outlined in the *Engagement Plan* (pages 1 and 2) have not been tested or assessed against the APLMS and the values it espouses.

AILA SA acknowledges that there needs to be a balanced approach to activation and preservation of the Park Lands, and that in some scenarios, sensitive development can support preservation by raising awareness of the Adelaide Plains landscape qualities and by providing access for people to enjoy and become better informed.

It is unclear how First Nations people have been engaged on the Code Amendments, and how the engagement has been incorporated into the Code Amendments. There is no reference of significant or identified cultural heritage in the *Engagement Plan*.

In summary, AILA SA supports the key objectives of the APLMS to:

- optimise the potential of the Adelaide Park Lands as a major city destination;
- encourage development with greater use of the facilities and attractions on offer;
- encourage development that supports population growth in and near the city;
- protect and enhance biodiversity;
- showcase world and national heritage values;
- support tourism;
- provide high quality public spaces for rest and play;
- enhance social connectedness;
- enhance people's connection to nature; and
- mitigate the effects of a changing climate and promotes a carbon-neutral city.

Recommendations

Recommendation 1.1 The Adelaide Park Lands Management Strategy is used to assess the benefits or otherwise of the Code Amendments.

The APLMS is a public document, reflective of a comprehensive engagement process, and is the most current spatial master plan for the Adelaide Park Lands in use by the Adelaide Park Lands Authority.

Recommendation 1.2 All development in the Adelaide Park Lands must be focused on public uses and benefits.

The fundamental premise of the Adelaide Park Lands is for the benefit of all people and the environment. All development must be determined and crafted around the benefits to the public first and foremost.

Recommendation 1.3 All development in the Adelaide Park Lands, including the Code Amendments, must include early engagement and inclusion of First Nations people.

It is unclear how First Nations people have been consulted on the Code Amendments, and we note the importance of significant cultural sites and areas, as well as the early, respectful, meaningful and inclusive engagement of First Nations of the Code Amendments before any changes are proposed.



2. New Women's and Children's Hospital and Code Amendment

AILA SA is concerned that a broader contextual and spatial analysis of the new Women's and Children's Hospital is lacking, and we have specific concerns with the development of the proposed car park and the selection of that site and its intended use/s.

The proposed development needs to demonstrate how it fits into the broader future vision for the Riverbank Precinct, particularly against the framework set by the Greater Riverbank Master Plan and the APLMS.

The new Women's and Children's Hospital is proposed to be built on land west of, and adjacent to the Royal Adelaide Hospital, involving the rezoning of approx. 145,000m² of the Adelaide Park Lands to *City Riverbank Zone (Health Subzone)*.

The proposal outlines a three-storey carpark for 1215 car spaces for hospital staff and visitors, including a bridge over the rail line linking the nWCH with the carpark and Bonython Park. This is not supported.

There is potential to retain, celebrate and improve the Adelaide Gaol site, the existing uses, and celebrating the cultural and historical significance, similar to the recent adaptive reuse outcomes in the Lot Fourteen Precinct.

The Code Amendment and accompanying material includes little or no recognition of the biodiversity, habitat and importance of Karrawirra Parri/River Torrens – this is a failure of the engagement and more importantly the role of the relevant provisions in the Adelaide Park Lands Act 2005.

This must be addressed in the Code Amendment to protect, enhance and improve the biodiversity and habitat of the areas concerned.

Recommendations

Recommendation 2.1 The Code Amendment needs to outline clearly the outcomes sought for the rezoning.

The outcomes of the Code Amendment for the nWCH is not clear, nor how it integrates with the intent of both the Adelaide Park Lands Management Strategy 2015-2025 and the Greater Riverbank Precinct Master Plan. The Code Amendment must clearly state the development outcomes and the public benefits of the proposal and clarify what the term 'appropriate development' actually means.

Recommendation 2.2 The State Government must consider and/or demonstrate alternative plans for car parking, transport access and general access to the nWCH avoiding the need for building car parks on the Adelaide Park Lands.

The fundamental premise of the Adelaide Park Lands is for the benefit of all people and the environment. All development must be determined and crafted around the benefits to the public first and foremost. Multi-storey car parks are not an acceptable form of development on the Park Lands. AILA SA opposes the car park in its current location on the Adelaide Park Lands.

Further, the State Government must consider alternative car park sites, including within the city west area, with direct and clear public access using direct and ample footpaths and connections. Any aims of new government infrastructure must include more options for workers who want to use active and public transport.

Recommendation 2.3 The Code Amendment must address the protection, enhancement and improvement to biodiversity and habitat of Karrawirra Parri/River Torrens.

It is unclear how the ecological importance of Karrawirra Parri/River Torrens and biodiversity and more generally habitat is addressed as part of the Code Amendment.



3. Broader Riverbank Precinct Matters

The Riverbank Precinct identified in the Engagement Plan is one of South Australia's most important public areas, and fully located within the Adelaide Park Lands.

Adelaide's Riverbank could be one of the world's great public spaces, yet the current approach is to divide and separate the very parts that unite the city's place to gather.

The Code Amendment is not backed up by the references to the APLMS and the Greater Riverbank Precinct Master Plan – development plans are not master plans and do not include or assess connectivity, amenity, natural features, integrating biodiversity and habitat nor connections to the city and North Adelaide.

The expanded Entertainment Precinct Code Amendment does not specify or outline minimum open space requirements, maximum development heights and is not backed up with a thorough spatial analysis to confirm where and how development might proceed.

Within the Active Waterfront Precinct, the river's edge could be considered as part of the expanded Entertainment Precinct and there is no clarity if retail development is envisioned as part of the Code Amendment. There is no detail nor assurance that small scale entertainment land uses are unobtrusive and compliment the open character of the Precinct.

There is no reference nor link to the involvement and direction from Green Adelaide in relation to Karrawirra Parri/River Torrens and the impacts on habitat and biodiversity. The Engagement Plan suggests Green Adelaide '*...have an interest in greening metropolitan Adelaide. Will have an interest in impacts on the park lands from the proposed development.*'

Further, AILA SA is not clear on how the Code Amendment might impact or influence the State Government's advocacy for Adelaide to become a National Park City with the proposed Code Amendments.

As such, we strongly recommend a holistic government approach to the Riverbank, which has been subject to many individual efforts over many decades, with not all being successful in creating a unified, productive, and enjoyable destination.

We encourage the State Government to reconsider the public nature of intensively used areas of the Riverbank Precinct, and to prepare a broader Master Plan that acknowledges a vision as a place for people, allows for buildings on the proviso that they are 'guests' in the Adelaide Park Lands and must satisfy a broader public benefit first and foremost, acknowledges and respects First Nations, habitat and biodiversity, minimises car access and promotes active transport, and involves all those relevant in the Riverbank Precinct.

Confirmation of an approach to the Riverbank Precinct which asserts a public benefits test will help define, refine, and reinforce its role as a critically important environmental and economic role with the Adelaide Park Lands.

Recommendations

Recommendation 3.1 The Riverbank Precinct must have a holistic and agreed Master Plan.

We encourage the State Government to reconsider the public nature of intensively used areas of the Riverbank Precinct, and to prepare a broader Master Plan that acknowledges:

- 1. A vision that reinforces the Riverbank Precinct as a place for people and the environment*
- 2. All buildings are 'guests' in the Adelaide Park Lands and must satisfy a broader public benefit first and foremost*
- 3. Engaging with, integrating, and respecting First Nations*



4. *The need for improving biodiversity and habitat, as well as the functions and natural ecologies of Karrawirra Parri/River Torrens*
5. *Remove/reduce and minimise car access and encourage walking and cycling to and from the Riverbank Precinct, and celebrating the importance of people meandering, recreating, staying and playing in the area.*
6. *Involve all government agencies in the master plan process to ensure all objectives are addressed for the benefit of everyone.*

Recommendation 3.2 Ensure Karrawirra Parri/River Torrens is considered more inclusively, as a natural and cultural asset, and is not simply an 'add on'.

Karrawirra Parri/River Torrens is the lifeblood of the Adelaide Plains, with a rich, diverse and culturally important role in shaping and defining life in Adelaide. It must be treated with respect and inclusivity.

4. Summary

AILA SA supports the principles of good design and development in South Australia aligned to clear strategy and policy, especially in the world heritage-listed Adelaide Park Lands. The Park Lands were established for the benefit of all South Australians.

We are unclear on how and why the proposed Code Amendments are not covered by the current planning and design provisions, and we are concerned that the current master plan for the Adelaide Park Lands – the *Adelaide Park Lands Management Strategy 2015-2025* – does not appear to be referenced nor used in assessing any changes to the Code. This is an opportunity to improve any future proposed changes to the Code, referring to the existing and endorsed master plan.

AILA SA is opposed to the new car park associated with the new Women's and Children's Hospital being located on the Adelaide Park Lands – this will set another precedent for development which is not at all appropriate.

The original intent of the Adelaide Park Lands is for the benefit of all South Australians, for recreation and activity. AILA SA is not opposed to considered development within the Riverbank Precinct, evidence suggests it is screaming out for a holistic master plan that is focused on the spaces between developments – not just the development themselves.

I would like to thank the Minister for the opportunity to provide our considered feedback. Should you require any aspect of our submission to be discussed further, please do not hesitate to contact me.

Yours sincerely,

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President, AILA, South Australian Chapter