



Adelaide Park Lands Preservation Association, Inc.

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Lot Fourteen (old Royal Adelaide Hospital) Innovation Area DPA

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1. About APPA

The Adelaide Park Lands Preservation Association Inc (APPA) was founded in 1987 as a non-profit community based 'watchdog' to guard Adelaide's greatest treasure: the unique open spaces of its Park Lands, which include the city squares. APPA offers a focal point for South Australians to help in the preservation and restoration of Colonel Light's visionary gift.

Apart from current campaigns about specific issues or Park Lands sites, APPA has three ongoing *unique* activities designed to focus community attention on, and raise awareness of the rarity, beauty and world importance of the Adelaide Park Lands. These regular activities are:

- the biennial Adelaide Park Lands Art Prize;
- the Park Ambassadors Program, with guided walks through the Park Lands; and
- provision and maintenance of on-line resources to encourage the community to discover and explore the Park Lands, including:
 - self-guided walking "trail guides,
 - the Adelaide Park Lands 'photo of the day' and 'video of the month.'

Through these activities, APPA is aware of a very strong and widespread community commitment to the long term protection of the Adelaide Park Lands.

2. Definition of Adelaide Park Lands

The Adelaide Park Lands are defined by Part 3 of the *Adelaide Park Lands Act 2005* (APL Act). Under the Act, the area designated as Adelaide Park Lands is defined by a plan deposited in the General Registry Office, Adelaide (GRO 127/2006). See Fig 1. It includes the six squares, Palmer and Brougham Gardens. The area designated as Adelaide Park Lands may be changed only by resolution of both Houses of Parliament.

The APL Act states sites in the Park Lands "should be held for the public benefit of the people of South Australia" (not private interests).

The area of the former Royal Adelaide Hospital ("Lot Fourteen" is part of Adelaide Park Lands.

3. Development Plan amendment

The *Lot Fourteen (old Royal Adelaide Hospital) Innovation Area Development Plan Amendment* (DPA) proposes to amend the Adelaide (City) Development Plan to rezone the former Royal Adelaide Hospital site to permit business, education, research, tourist accommodation and retail facilities.

4. Failure to comply with Section 23 of the APL Act

Section 23 of the APL Act provides:

23—Steps regarding change in intended use of land

(1) If land within the Adelaide Park Lands occupied by the Crown or a State authority is no longer required for any of its existing uses, the Minister must ensure that a report concerning the State Government's position on the future use and status of the land is prepared within the prescribed period.

(2) A report under subsection (1) must include information on the condition of the land and on the action (if any) that would be required in order to make the land suitable for public use as park lands.

(3) The Minister must, after the completion of a report under subsection (1), cause copies of the report—

(a) to be laid before both Houses of Parliament; and

(b) to be furnished to the Adelaide City Council.

(4) The Minister must, either during or after the completion of the report required under subsection (1), enter into discussions with the Adelaide City Council about whether the land should be placed under the care, control and management of the Council.

The Minister has failed to comply with this provision. No report has been prepared nor tabled in Parliament, nor provided to the City Council.

This failure calls into question the validity of the proposed DPA.

5. Content of the DPA

While the Lot Fourteen DPA explicitly acknowledges that “the site also falls within the Adelaide Park Lands” and suggests “maximising the land returned to flexible community open space” there is nothing in the DPA that requires any of the site to be returned to Park Lands.

APPA is most concerned that the DPA allows commercialisation of the site and the construction of high rise buildings in direct contradiction to the provisions of the Adelaide Park Lands Management Strategy 2015-2025, which envisages cultural and community land uses for the site.

APPA does not support the construction of any new buildings on the site but if this is to occur they should complement the existing state heritage-listed buildings that are proposed to remain. APPA supports re-purposing the existing heritage buildings for public (not private) purposes.

Consistent with provisions of the *Environment Protection and Biodiversity Conservation Act 1999 (C'wealth)* (EPBC Act) the view of any new buildings should not impact on views from within the National Heritage-listed area of the adjacent Adelaide Botanic Gardens.

Previous investigations undertaken by the Adelaide Botanic Gardens suggest that a height limits on the site should be restricted to 28 metres (approximately 8 storeys) and transition down to zone boundaries in order to minimise those impacts.

APPA anyway urges the State Government to undertake an assessment of the impacts of the DPA on the National Heritage values of the Adelaide Botanic Garden, as required by the EPBC Act. The Adelaide Botanic Garden is Adelaide’s third most popular tourism attraction (behind the Adelaide Central Market and Glenelg Tram).

APPA would support a high percentage of the so-called “Lot Fourteen” being returned to Park Lands. Unfortunately this is not the intention of the current State Liberal Government nor was it that of the previous State Labor Government. However the previous State Labor Government had proposed to return two hectares of the eastern side of the site to the Botanic Gardens and although this area would not have the same public access as Park Lands it was committed to return part of the site to a Park Land environment. There is no such commitment from the current State Liberal Government to return any of the site to the Park Lands nor to the Botanic Gardens.

The DPA identifies 56% of the site being “Public Realm” which refers to paved tree lined roadways, forecourts, plazas, landscaped open spaces. These areas cannot be compared with the existing grassed and wooded Adelaide Park Lands. The DPA should explicitly state how much of the site is intended to be “Public Realm” and how much, if any, is proposed to be returned to “Park Lands”

6. Adelaide Park Lands in a world context

Adelaide is unique in that it is surrounded by Park Lands that abut East Terrace, South Terrace and West Terrace. Unfortunately because of developments by successive State Governments there is no section of the Park Lands actually abutting North Terrace. The redevelopment of the so-called “Lot Fourteen” represents a once only opportunity to re-establish a section of Park Lands abutting North Terrace. At the very least, there must be a Park Lands corridor alongside the western boundary of the Botanic Gardens to link the Park Lands at the corner of East Terrace and North Terrace with Frome Park on the northern boundary of the so-called Lot Fourteen. This should be a natural grassed and wooded corridor incorporating the Park Lands Trail which currently ends at the corner of North Terrace and East Terrace. Such a corridor would also be able to be used by those persons working within the so-called Lot Fourteen to relax in what should become a pleasant natural Park Lands environment.

The DPA states that it has “a focus on the public realm including tourism, hospitality and cultural land uses that are carefully interfaced and integrated with the surrounding land uses and precincts”. Surely a Park Lands corridor through the site that provides a continuous grassed and wooded link between the eastern Park Lands and Frome Park would satisfy this requirement.

There is nowhere else in the world where tourists can visit a major city that is surrounded by Park Lands incorporating a Park Lands Trail that enables them to walk or cycle around the whole city (except it currently stops at the corner of East Terrace and North Terrace)?

Along this trail tourists can experience the Riverbank Precinct with its many attractions, wooded steep natural banks of the River Torrens downstream of the Adelaide Weir, sports grounds, natural grassed and wooded areas that are equivalent to the South Australian countryside, a trail through the historic West Terrace Cemetery with graves of original settlers and war veterans, the Himeji Japanese Gardens, the old bullock trail to Mount Barker Road, Adelaide’s original water storages and so the list goes on!

Adelaide Park Lands with the right promotion would complement the Government’s promotion of the “Adelaide City Centre as the cultural, entertainment, tourism and economic focus of Greater Adelaide” as identified in the DPA.

The City of Adelaide should be internationally recognised as the city surrounded by Park Lands just as New York is recognised as the city with the iconic Central Park!

7. Summary

The Minister's non-compliance with Section 23 of the APL Act calls into question the validity of this DPA. A report must be prepared to comply with Section 23 of the APL Act and this report must include a report on the "action required to make the land suitable for use as public Park Lands."

The DPA itself does not envisage returning any of the site to Park Lands. It should do so.

APPA does not support construction of any new buildings on the site, but supports repurposing the existing heritage buildings.

If any new buildings are constructed their height should be limited especially adjacent to the Botanic Gardens.

At the very least the Lot Fourteen DPA should include a requirement for a percentage of the site to be returned to Park Lands in order to provide (at an absolute minimum) a grassed and wooded Park Lands corridor linking the eastern Park Lands with Frome Park adjacent to the River Torrens. This corridor would also contribute to maintaining the National Heritage values of, and view lines from within the Adelaide Botanic Gardens.

