

26 November 2019

The Presiding Member
State Planning Commission
Lot 14 Innovation Area DPA
GPO Box 1815
ADELAIDE SA 5000

Dear Ms Fogarty,

The South East City Residents Association (SECRA) considered the Development Plan Amendment (DPA) for *Lot Fourteen (Old Royal Adelaide Hospital) Innovation Development Plan Amendments* released for consultation at the SECRA meeting held on 21 November 2019. These comments are provided after consultation with SECRA Committee members, one of whom attended one of the two public information sessions held at the Old Royal Adelaide Hospital Chapel.

We also note that the *Implementation Plan for the Adelaide City Deal*, a joint initiative between federal, state and local governments was released on 14 November 2019 which is during the consultation period for the DPA.

The Adelaide City Deal is a 10-year agreement between the Australian Government, the Government of South Australia and the City of Adelaide to grow Adelaide as an innovative and vibrant city. Governments will work together to deliver projects and initiatives that support the growth of businesses and jobs, encourage the growth of Adelaide's population, and build on the city's global reputation in the arts and culture.¹

SECRA is concerned about the development of Lot 14 on two main grounds.

Firstly, Lot 14 is seven hectares of Adelaide CBD located in the Adelaide Park Lands. With the removal of the health focus from the site, the proposal is to have a staged development of both commercial and government activity.

However, SECRA notes that there is no reference in these high-level goals for any of the site to be returned to Park Lands. The identification of spaces in the "public realm" within the DPA includes tree-lined roads, plazas, forecourts and landscaped open spaces which are not consistent with the general understanding of a "Park Land" environment.

SECRA can provide an example of the apparent lack of concern about the Park Lands within the project.

SECRA representatives met with two members of the Renewal SA Project Team on 2 April 2019 to discuss the provision of a Park Lands corridor through Lot 14. Such a corridor would ensure the continuation of the Park Lands trail around the Adelaide Park Lands which currently ends at the corner of East Terrace and North. At that meeting SECRA was advised that it was impractical to provide a Park Lands corridor incorporating a trail along the western boundary of the Botanic Gardens because of the different ground levels and that roadways through the Lot 14 site would provide a continuation of the Park Lands Trail.

SECRA representatives advised that they disagreed with the statement that different ground levels would not allow a Park Lands corridor and also that there was no comparison between a grassed and

¹ <https://www.infrastructure.gov.au/cities/city-deals/adelaide/>

wooded Park Lands corridor and trail along the eastern boundary of Lot 14 linking the eastern Park Lands with the River Torrens and a paved tree-lined streets in between buildings. Comments by the two Project Team members made it clear that they had no interest in responding to this request despite the fact that it would complete the Park Lands Trail circuit around the City of Adelaide. What did not seem to be appreciated is that Adelaide is the only major city in the world that offers both residents and visitors with such a unique experience.

It is experiences such as this that have led SECRA to the view that Lot 14 provides an opportunity to be able to place an innovative repurposing of the existing heritage buildings with some minor new builds within a Park Land setting which is managed by the City of Adelaide within the existing Park Land framework. A management plan required under s20 of the Act would assist in the development of the Park Land component of Lot 14.

SECRA would like to be reassured that there is no duplication in the development of new facilities at Lot 14 and that limited government resources are being well utilised. For instance, other established government initiatives have established Technology Park to develop innovation and technology while TAFE SA Regency International Centre already delivers a range of hospitality, travel and tourism courses for careers in food production and preparation. Both of these concepts also appear in the DPA for Lot 14.

SECRA would like to address a few of the specific issues we found in the DPA as we were unable to deliberate on all of the matters contained in the DPA due to time constraints. They include:

- SECRA believes the list of development types outlined in the DPA should be reduced, minimising commercial operations. SECRA suggests that this list of approved uses should be reduced to exclude uses such as hotels, serviced apartments, tourist accommodation, light industry, and motels.
- In the same context, SECRA believes that allowing a landmark building of greater height and iconic identity than the existing tallest building on the site containing historical buildings is undesirable in the Park Lands. The lower skyline will also make a distinction with the city zones and should retain the upper height limit established by the existing buildings.
- SECRA supports a DPA which frames transport in terms of walking, cycling and limited vehicular movement. While the DPA seeks strong linkages with nearby destinations and direct links to the public transport network it is unable to link to existing Park Lands through a Trail or similar. (see above).
- SECRA supports the opportunity that the development of Lot 14 presents in the
 - recognition of indigenous culture through the protection of items and places of Aboriginal heritage, and
 - strengthening relationships with Aboriginal peoples which then can inform the building of a purpose-built national gallery. Further, the *Adelaide City Deal Implementation Plan* suggests that Aboriginal employment and small business outcomes will be sought.
- SECRA supports the establishment of visually transparent and open style permanent fencing integrating the Adelaide Botanic Garden into the open space in Lot 14.

SECRA's other policy matter relates to concern about the competitive neutrality of the activities in Lot 14. By using Adelaide Park Lands as the site for future commercial operations such as accommodation, hotels, restaurants and conference facilities, the State Government may not be passing on the full costs of the facilities including an estimate of the cost of the land in their leasing arrangements. In turn, this provides unfair competition to those established business and services, some of which are found in the East End of the city. A similar view on the role of government in the provision of commercial activities was strongly articulated by sections of the hotel sector opposing

the development of the hotel on the site of the Adelaide Oval in the Legislative Council's *Select Committee into the Redevelopment of Adelaide Oval*.

Thank you for the opportunity to comment and SECRA accepts the invitation to make a further verbal submission.



Elizabeth Rushbrook
Chair

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