

strengthening our community

1 February 2019

Ms Leslie Guy
Secretary
Select Committee Adelaide Oval Hotel Development
C/o Parliament House
GPO Box 572
ADELAIDE SA 5001

Dear Ms Guy

RE: Select Committee - to 'inquire into and report on a redeveloped Adelaide Oval', including the proposed hotel development'.

The South East City Residents Association (SECRA) wishes to express to the Select Committee our deep concern at the hotel proposal for the Adelaide Oval located in the Park Lands at North Adelaide.

SECRA is an independent, voluntary body with substantial membership which

- promotes the interests of residents of the south-east precinct of the City of Adelaide and adjoining areas
- works to preserve and enhance the inherent character and heritage of the neighbourhood including the Adelaide Park Lands, and in particular, Victoria Park, and
- supports the provision of local retail and service facilities whilst retaining the "village atmosphere" of Hutt Street.

SECRA believes that the proposed Adelaide Oval Hotel development demonstrates that the existing legislative system is entirely inadequate to protect our National Heritage listed Park Lands from commercialised use.

SECRA members are ratepayers of the City of Adelaide Council. As such, we value and financially support the ongoing maintenance and development of the Park Lands as a social good not only for residents in our increasingly densely populated urban environment but also for the wider South Australian community and the many tourists who visit Adelaide.

SECRA wishes to comment on following Terms of Reference:

(c) The corporate governance of the Oval, including the Stadium Management Authority, and

(h) the legislative, regulatory and other legal frameworks governing the operations of the Adelaide Oval, and any opportunities for improvement

SECRA's recommendation: That the *Adelaide Oval Redevelopment and Management Act 2011 (SA)* is refreshed and among other things incorporates a mandatory community consultation process on significant matters affecting the operation of the Adelaide Oval.

The relationship between the City of Adelaide Council, the government through the Minister for Transport and Infrastructure, and the Stadium Management Authority is underpinned by the *Adelaide Oval Redevelopment and Management Act 2011 (SA)*. SECRA notes that the Adelaide Oval redevelopment was to be completed by 2014.

Therefore, before a new stage in the development of Adelaide Oval is finalized it is an appropriate time to refresh this legislation which, among other matters, should incorporate a mandatory community consultative process on significant matters affecting the Adelaide Oval. The recent press coverage, public demonstrations, extensive Ministerial correspondence and the establishment of the Select Committee all illustrate that South Australians have a want, and have an expectation of a greater say in major developments that are planned for their city, particularly those which impinge upon the Park Lands.

(i) the impact of the Oval and its operations on the surrounding Park Lands and the legislative, regulatory and other legal frameworks governing further development in the Park Lands;

SECRA's recommendation That as the *Adelaide Park Land Act 2005* has not been able to attain its objectives amendments are required to protect the Park Lands from further loss of public land and amenity. Further, the *Major Events Act 2013* and the *Planning, Development and Infrastructure Act 2016* require amendments to ensure that public consultation processes are available on significant matters relating to the use of, or development in, the Park Lands to improve the existing governance and regulatory system.

SECRA concurs with the City of Adelaide Council which wrote in its submission that the

"Park Lands have always been a highly contested space and over the last 181 years Adelaide has lost approximately 20% of this highly valued public land. Primarily through the Adelaide Park Lands Act 2005 (SA), a detailed and complex regime has developed about the use and management of the Adelaide Park Lands. The overall aim of this regime is to stem, and indeed reverse, the loss of Park Lands and to preserve their integrity and values."

The Act has not been successful in retaining the Park Lands as open space and so in the face of continued development pressure and commercialization it requires amending.

SECRA appreciates being consulted on matters by the Adelaide City Council which relate to the development and management of the Park Lands in the south-east corner. Recent examples include the design and location of an amenities block in Victoria Park and input to the plan for Park 21W. However; we note that the City of Adelaide Council's use of confidential provisions within the *Local Government Act* has at times hindered public input into the use of the Park Lands. This should be addressed in the amendments to the *Adelaide Park Land Act 2005*.

There is a common theme to two pieces of legislation which impact upon the use of the Park Lands by overriding the existing powers held by the City of Adelaide City Council and thereby severely restrict community consultation processes. One is the *Major Events Act 2013 (SA)* which overrides the City of Adelaide Council's planning and traffic powers by allowing inappropriate motor sporting events to be held in the Park Lands. There appears to be no need to retain these powers for such events as a fit for purpose world class facility is now available at Tailem Bend. These powers should only be available when there is a demonstrated need and should be renewed regularly to reduce their misuse.

The other Act that is of concern is the *Planning, Development and Infrastructure Act 2016* (SA) and in particular the role of the State Commission Assessment Panel in matters relating to Category One projects which do not require public consultation process developments which affect the very fabric of our city. These projects include, but are not exclusive to, the Adelaide Oval Hotel.

SECRA notes that this development of the Park Lands for major projects of a commercial nature is now becoming accepted. Media speculation on a Crows Clubrooms, an expanded tennis facility, the redevelopment of the "old RAH" to Lot 14, and a golf clubrooms redevelopment complete with a major stadium provide recent examples.

(j) any other related matters.

SECRA's recommendation: That a study is undertaken by an independent body on establishing the economic value of the Adelaide Park Lands to the city.

SECRA believes that it is very telling that no government has assessed the economic value of the Park Lands open space in terms of a reduction in physical and mental health costs, valuing its environmental and biodiversity worth, the opportunities provided by walking and cycling tourism, provision of sporting and leisure activities, and the provision of open space for those living in high density buildings. With this information, the value of the Park Lands will be demonstrated in a way which will provide additional information about the unquantified opportunity costs of significant developments seeking to use them.

In closing, SECRA joins in the condemnation of the construction of the proposed hotel on the site of Adelaide Oval. We believe that openness and transparency are essential ingredients to build accountability and trust between all levels of government and their citizens, which in turn is necessary for the functioning of our democracy and economy.

Further, SECRA would be pleased to address the Select Committee on this matter to present a more detailed proposal on the matters raised in this submission which will enable current and future generations to enjoy Adelaide's unique heritage Park Lands.

Yours sincerely



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