



Australian  
Institute of  
Architects

# DRAFT RIVERBANK PRECINCT CODE AMENDMENT



PlanSA

[plansa@sa.gov.au](mailto:plansa@sa.gov.au)

South Australian Chapter

Submission date: October 2021

## ABOUT THE INSTITUTE

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 12,000 members across Australia and overseas.

The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

## PURPOSE

- This submission is made by the Australian Institute of Architects (the Institute) in response to the Draft Riverbank Precinct Code Amendment.
- At the time of this submission the National President is Tony Giannone and the SA Chapter President is Anthony Coupe.
- The Chief Executive Officer is Julia Cambage.

## CONTACT DETAILS

Australian Institute of Architects  
ABN 72 000 023 012  
15 Leigh Street  
Adelaide SA 5000  
[sa@architecture.com.au](mailto:sa@architecture.com.au)

### Contact

Name: Nicolette Di Lernia | SA Executive Director  
Email: [nicolette.dilernia@architecture.com.au](mailto:nicolette.dilernia@architecture.com.au)

## TABLE OF CONTENTS

---

1	Introduction.....	3
2	DETAILED RESPONSE – General principles.....	5
3	DETAILED RESPONSE – Proposed Subzones.....	11
4	Conclusion.....	14
5	Recommendation summary.....	14
	REFERENCES.....	16

# 1 INTRODUCTION

The Australian Institute of Architects (the Institute) is the peak body for the architectural profession in Australia, representing around 12,000 members. The Institute works to improve our built environment by promoting quality, responsible, sustainable design. Architecture influences all aspects of the built environment and brings together the arts, environmental awareness, sciences and technology.

By combining creative design with technical knowledge, architects create the physical environment in which people live, which in turn, influences quality of life. Through its members, the Institute plays a major role in shaping Australia's future.

Architects are a key component of Australia's \$100 billion built environment sector and there are around 13,500 architectural businesses in Australia with about 40,000 employees. Approximately 25,000 people in the labour force hold architectural qualifications (Bachelor degree or higher) and architectural services in Australia in 2017-18 had revenue of \$6.1 billion and generated \$1.1 billion of profit<sup>1</sup>

Australian architects have a worldwide reputation for creative and innovative design leadership and Australia is known for producing contemporary and breakthrough architecture. We have a well-recognised, high quality and liveable built environment. To maintain this into the future and support our burgeoning population in both urban and regional centres, we must create buildings and public spaces that are environmentally, economically and socially sustainable and culturally rich.

The Institute, therefore, welcomes the opportunity to make a submission to this consultation on the *Draft Riverbank Precinct Code Amendment* (the Code Amendment).

## Background and Overarching positions on the draft (SA) Riverbank Precinct Code Amendment

The Adelaide Park Lands and City Layout National Heritage Listing states that 'Adelaide is the only Australian city to be completely enclosed by park lands and has the most extensive and intact 19th century park lands in Australia. Adelaide Park Lands also has strong links to the Adelaide community as a place for many leisure activities and civic events. .... Community groups have campaigned for the protection of the park lands as far back as 1869.'

George Kingston's letter to Parliament<sup>1</sup> confirms the longstanding community support for maintaining the Park Lands as designed by Light when he laid out the City of Adelaide. This resource is highly valued, and the significant number of negative responses to the Draft Riverbank Precinct Code Amended that have already been submitted demonstrates that the community does not support this asset being used as a land bank for development purposes.

The listing goes on to state that 'The Adelaide Park Lands and City Layout is regarded throughout Australia and the world as a masterwork of urban design and the model has been used widely by other towns in Australia and overseas. It 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 picturesque Adelaide Park Lands is important to the identity of South Australia. It is a hallmark of the city's original design, which has maintained elements of its historical layout for more than 170 years.'

In addition to being a world recognised feature of the city of Adelaide and of great significance to the local community, the Park Lands have provided an organising structure for the development

of Adelaide since Europe settlement was initiated. They have assisted in regulating property values, provided recreational, cultural and community resources, mitigate environmental and climatic impacts and are a unique feature that is recognised locally and internationally.

Parks are an increasingly valued commodity for the world's large cities. Whether it is for recreational purposes like cycling, adventure playgrounds or paddling pools or they may have an environmental aspect like community gardens, wetlands or flower meadows. They may serve as sanctuary for native plants and wildlife. There is also increasing evidence that access to green landscaped space provides both physiological and mental health benefits to people who have contact with these spaces.

Few cities have parklands on the scale we enjoy in Adelaide. It can accommodate endless activities and features that will support future growth of the City's population, as well as urban consolidation in the surrounding suburbs. To support this growth and maintain Adelaide's reputation for liveability, public access to substantial areas of open green space without fees or required memberships must be a key objective.

The Park Lands were designed as and must continue to be thought of as one, as described in Jan Gehl's 2011 report: *Public Spaces & Public Life Study*<sup>ii</sup>. Carving the parklands into distinct zones or even sub-zones that are planned independently is compromising the essence of this world-renowned feature.

The proposed Code Amendment of Adelaide's Riverbank Precinct's stated aim is to allow future development of "infrastructure initiatives of state significance". The Institute, in principle, supports vital infrastructure necessary to ensure the economic, health, education and amenity infrastructure of the state. However, future infrastructure proposals and associated code amendments must have a balanced approach to ensure the preservation of Adelaide's heritage, culture, and identity.

There is concern that the formation of the Health Precinct, Innovation Precinct, and Entertainment Precinct, while providing desirable amenity, have compromised the continuity and public accessibility of the Park Lands by turning the park into an urban structure. There is concern that the proposed expansions of these precincts will further negatively impact on the completeness of this natural feature.

The proposed new Riverbank Precinct and proposed zoning to sections of the Park Lands, have the biggest cultural impact. These areas have the strongest interface with the densest population, and provide an escape from the busy CBD. There is a lack of clear articulation within the proposed Code Amendment as to the nature and potential future urban planning and built environment impact within these areas. There is concern that this lack of articulation potentially enables a significant degree of flexibility in interpretation.

There is further concern that the proposed Code Amendment will facilitate future development at a significant scale and density which will be contradictory with the intent of the Park Lands and significantly impact on their public accessibility and availability as a natural resource for the city. The Parklands, through their National Heritage Listing, are regarded as a national treasure, and thus need to be carefully managed, protected and sensitively improved over time with due regard to its historic purpose and beyond.

The Institute advocates for a clearly defined planning system that brings certainty to its inhabitants as to the nature of future development, encourages innovation, good design and is collaborative in its process.

## 2 DETAILED RESPONSE – GENERAL PRINCIPLES

### 2.1 Legislative Issues

As noted, the Institute is concerned that the lack of clear articulation of the framework guiding permissible future development within the proposed Code Amendment, will not deliver the intended high quality, well considered outcomes. The proposed Code Amendment requires rigorous wording that avoids open ended and ambiguous statements to ensure a robust framework and for future development application assessments and eliminate unacceptable flexibility of interpretation.

The Institute recommends that the Code Amendment, be rewritten to provide a wholistic and rigorous framework for shaping future development. It must provide a robust assessment rubric with critical objectives mandated and not left to the discretion of future government, developers, or approval authorities. This is required to provide the community with a clear understanding of what they can expect from future development and should strongly reflect community aspirations for this exceptional public resource.

Clear definition of the objectives for the Riverbank Precinct accompanied by a robust, explicit planning framework is critical to achieving best practice outcomes. It will enable future development to be objectively assessed and avoid amending the planning system to support pre-determined outcomes.

---

#### BEST PRACTICE EXAMPLE

City of Melbourne Design Guide and the associated Plan Scheme Amendment C308 in an example of best practice planning legislation, providing clear, explicit set of parameters for future development.

---

### 2.2 Overarching vision

A coordinated long-term vision for the area of Park Lands fronting the River Torrens is not evident in the proposed Code Amendment.

Considering the significance of the area subject to the Code Amendment and the complexity and scale of some of the proposed development, the Institute recommends that individual, detailed masterplans be developed for each of the proposed projects – the Arena, The Women’s and Children’s Hospital, additional health, research and education facilities and adaptive reuse of the heritage listed sites - as a separate exercise to the Code Amendment. This is critical to ensuring that these facilities are appropriately scoped, as opposed to being scoped to suit their proposed locations.

Having determined optimal parameters for each project, it will be possible to assess whether they are best suited to the sites proposed in the Code Amendment, or whether an alternative site would be more appropriate. If this is not done, there is a significant risk that these facilities will be operationally compromised and that the environment in which they are locate will also be negatively impacted.

---

## CASE STUDY

The National Wine Centre (NWC) was initially proposed to be located on the former Goodman Building and Tram Barn site. The site was selected on the basis that it was a degraded area of government-controlled land and provided an opportunity to realise a significant development supporting a key industry section in a way that mitigated site procurement costs. However, the proposal did not align with the objectives of the wine industry or the neighbouring Botanic Gardens. The decision to swap the proposed NWC site for land under the control of the Botanic Gardens on the corner of North Terrace and Hackney Road resulted in significant benefits for both stakeholders and the community. It improved the amenity of the corner site, facilitated high quality adaptive reuse of five State Heritage Listed buildings, increased connection and visibility into the Botanic Gardens from the east, provided best practice administrative and herbarium facilities for the Botanic Gardens and enabled the NWC to be designed as a distinctive, landmark building that reflected the stakeholder aspirations

---

The master-planning process ideally will inform the appropriate scale, density, mass, height, location and type of development. There are concerns that the proposed potential intensity of development in the proposed Code Amendment is inappropriate and unjustifiable. Significant areas suited to development exist in the western sector of Adelaide and in Hindmarsh. Compromising the Riverbank Precinct and Park Lands for development is unsympathetic to the intent of these significant assets. We would recommend re-prioritisation of revitalisation of degraded and underutilised urban areas within and close to the City.

### 2.3 Compliance with State Planning Policies

It is stated on page 12 of the consultation document that the 'Code (including any Code Amendment)' must comply with any principle prescribed by a State Planning Policy. While some areas of alignment have been provided, the Code Amendment is ambiguous with regards to addressing several policies, namely:

- Policy A21: "Work with the traditional owners to identify and protect sites and areas of significance to Aboriginal heritage and culture and, where appropriate, incorporate identified sites into regional and other plans." It is not clear how this policy has been addressed by proposed Code Amendment.
- Policy P92: "Support the enhancement of the 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." It is not clear how the proposed Code Amendment will mitigate any conflicting outcomes stemming from this policy.

- Policy P115: “Incorporate water-sensitive urban design in new developments to manage water quality, water quantity and water use efficiency and to support public stormwater systems”. It is unclear how the proposed code amendment will mitigate risks associated with negatively impacting on the objectives of this proposal, particularly in the “Riverbank Subzone” area.
- Policy 5.2: “the good design of public places to increase climate change resilience and future liveability.” It is not clear how this Policy is supported, with the Code Amendment proposing a significant increase in the amount of hard landscaped and building development in what is currently soft landscape that controls run off to a water course and assists in reduction of urban heat build-up.
- Policy 7.1: “The sensitive and respectful use of culturally and historically significant places.” and Policy 7.4: “The appropriate conservation, continuing use and, as appropriate, adaptive reuse of our heritage places and heritage areas of value to the community.” It is not clear how these Policies will be met in the context of adaptive reuse of the Formal Adelaide Gaol site as a part of the proposed Health Precinct. This site is intrinsically linked to incarceration and capital punishment, and may be interpreted as poorly suited, physically, and contextually, to use as health care facilities. While the Institute supports adaptive reuse of listed buildings, it notes that the proposed use needs to be appropriate to the intrinsic nature of the place. In the case of the Old Adelaide Gaol, reuse for cultural, interpretive and memorial purposes is recommended. This position is supported by the transition of the former Glenside Hospital listed buildings, with similar layouts and cellular construction, from Health to Arts, where they have been adaptively reused for cultural functions.
- Policy 11.5: “Encourage development that supports the increased use of a wider variety of public transport modes, including public transport, walking and cycling, to facilitate the reduced reliance on private vehicle travel and promote beneficial health outcomes.” This Policy is not met by the Code Amendment, where there is a focus on the requirement for increased road capacity and carparking in response to the proposed land uses. As evidenced in the nRAH project, the development of health facilities comes with a high stakeholder and visitor expectation for parking. Therefore, the proposed expansion of the Biomedical Precinct works against the intent of this Policy.

The Institute recommends a thorough rubric assessment review of Code Amendment against the State Planning Policies to ensure public policy and vision for Adelaide is maintained.

## 2.4 Urban Consolidation

Urban consolidation is a stated objective of the South Australian government and the planning system. On one hand urban consolidation provides a confined extent for the city, preserving surrounding natural un-developed land. The unintended consequence, however, is that of reducing the private open space available to residents and increasing the proportion of land covered by impervious surfaces. The result of this consequence is the increased risk of flooding and increased urban heat gain.

We advocate for the preservation of green open space as a priority to mitigate the above stated consequences. Openly accessible landscape provides valuable public recreation space and assists with mitigation of the environmental impacts associated with urban consolidation. We recommend a review of the Code Amendment with an intent to retain open space within the existing City Riverbank Zone and mitigate rezoning of the existing Park Lands, with the exception of the area on the northeast corner of the current City Riverbank Zone currently occupied by the link to the Botanic Gardens and the Botanic High School.



## 2.5 Appropriate development within the Parklands

Activation of the Park Lands to generate vibrancy and support events should not presuppose construction of permanent structures and buildings. Development of the Park Lands should prioritise publicly accessible, open space projects supported by selective and highly curated supporting structures. We re-iterate our recommendation for precinct master plans to ensure appropriate balance between open space, permanent and temporary structures.

---

### CASE STUDY

South Bank in Brisbane – an activated, landscaped precinct with strong visual and physical links to Brisbane CBD and the Brisbane River. Built form is predominantly low scale and low density with the river frontage preserved as freely accessible open space.

---

## 2.6 Forest City/Adelaide as a National Park City

The SA Government’s commitment to nomination of Adelaide as a National Park City is to be commended. This initiative is fully supported by the Institute who have advocated as such. The objectives to “improve a city’s liveability, through a better connection between people and nature” to achieve “... a greener, healthier and wilder city, where people take action to be better connected with nature” has tangible environmental, social and economic benefits.

We see the current Code Amendment working directly against this nomination and suggest that the public will also see it in this light. Step 2 in achieving National Park status is Demonstrating Public Support to the nomination. We see the PDC Amendment as contrary to the objectives of a greener Adelaide by replacing open public space with privatised and semi-privatised development located on one of the city’s most prominent sites.

## 2.7 Remediation of degraded / underutilised sites

The Code Amendment has attempted to rezone subject areas that are ‘underutilised’ or ‘degraded’. We recommend remediation and activation of these areas in the first instance, to ensure appropriate demonstrated management and investment in these national and state cultural assets. Future proposed development must be focused on what is most suitable for these, not what is most expedient, under the lens of cultural significance and identity.

---

### BEST PRACTICE EXAMPLE

Redevelopment of the former SA Water Depot as Narnungga Urban Forest. This returned previously hard paved, privatized land to open and accessible landscaped space that supports biodiversity and provides space for active and passive recreation.

---

## 2.8 Heritage Management

Proposed changes to zoning will impact in part on the Adelaide Park Lands and City Layout National Heritage Place. Several 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. For example, a number of the rowing clubs, which have a long association with the Riverbank Precinct, are not protected by the Code Amendment and are located on sites proposed for development.

The Code Amendment does not provide an overlay plan identifying overlap with national heritage places. Such an overlay is necessary to ensure transparency and identification of scope of impact on heritage places to the various stakeholders, future developers and community. We recommend such an overlay be prepared as a matter of priority to ensure an integrated approach between infrastructure, heritage and cultural identity.

The proposed Code Amendment may not be a jurisdictional matter (an action) that can be considered under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), which is focused on specific projects. Despite this, it is strongly advised that an evaluation of the potential adverse impact of zone changes be undertaken, in consultation with the relevant authority, to ensure future development resulting from zone changes doesn't impact on national heritage values.

We recommend that a Conservation Management Plan for the national heritage places be prepared, consistent with National Heritage management principles and other requirements under the EPBC Act, to inform any zone changes and potential adverse impacts on national heritage values. Preparation of a Conservation Management Plan is a requirement of the EPBC Act and reflects Australian best practice heritage management, as outlined in The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance<sup>iii</sup>.

We note that the proposed zoning changes will also impact on several State Heritage Places, namely:

- Thebarton Police (originally Mounted Police) Barracks Complex, Port Road
- Former Adelaide Gaol, Gaol Road
- Former Powder Magazine & Surrounding Walls, Old Adelaide Gaol, Gaol Road
- Former Powder Magazine Keeper's Residence, Water Tank, Toilet, Fence, Garden and Curtilage, Old Adelaide Gaol, Gaol Road
- Torrens Weir (Weir No. 1), Adelaide, Park Lands
- Elder Park Rotunda, King William Road
- Adelaide Bridge over the River Torrens, King William Road
- Former Torrens Lake Police Station, Victoria Drive

The Institute supports in principle adaptive reuse of State Heritage Places, reflecting State Planning Policies and the ongoing interpretation and maintenance of heritage buildings. However, we foresee that the proposed zoning changes will result in development which will directly affect the heritage values of Thebarton Police Barracks and the former Adelaide Gaol. The heritage setting of both places of significance may be substantially compromised if development is undertaken in the expanded zones. Reference to Conservation Management Plans prepared for both places is required, to understand the impact of proposed zone changes.

## 2.9 Kurna Significance

Members of the Australian Institute of Architects in the South Australian Chapter encourage The Attorney General's Department and the South Australian Planning Commission to acknowledge and value the strength of our First Nations people's knowledge system in its consideration of the Draft Riverbank Precinct Code Amendment. First Nations knowledge of caring for Country will add value to the future utilisation and management of this area.

The Institute strongly supports all efforts and practical measures to realise co-creation by First Nations people and communities in SA's infrastructure. A co-creation process will also demonstrate respect for the continuing significance that this area has for the Kurna people.

The importance of the Torrens River to the Kurna people is acknowledged in the Code Amendment, but is not translated into the policy frameworks. The cultural importance needs to be explicitly recognised in the assessment of proposed development. The proposed development of the north bank of the River and open areas on the south bank of the river are of major concern in this context.

The level of change that has already occurred, which is cited in the Code Amendment, does not justify increasing the intensity of construction in the future.

---

### CASE STUDY

The NSW Government will incorporate a "Connecting with Country" element into the Design and Place State Environmental Planning Policy (SEPP) consequent to the recent review of this SEPP.

---

Considering the acknowledged significance of Karrawirra Parri (The Torrens River) and Tarntanya (the area occupied by the city and park lands) to the Kurna people, the Institute supports preparation of a Cultural Heritage Management Plan for the Park Lands, including the areas that are the subject of the Draft Riverbank Precinct Code Amendment. The Cultural Heritage Management Plan should be completed prior to any further consideration of development of the Park Lands and Riverbank Precinct (State Controlled Areas) and should be a primary resource in guiding future development.

---

### BEST PRACTICE EXAMPLE

The KKW compact engagement model (which translates as Head, Heart, Talking) used by Dr Richard Walley for the re-development of Yagan Square in Western Australia.<sup>iv</sup>

---

## 2.10 Engagement Process

The *Community Engagement Charter*<sup>v</sup> defines the principles for engagement with the community and stakeholders. These are defined as being inclusive, genuine, informed, and transparent. The pre-engagement process appears to have been restricted to select stakeholder groups with no reporting available as to the outcomes of this engagement. There appears to have been no community or first nations pre-engagement.

The Institute advocates for an engagement process that reflects the principles of the Charter and is inclusive and genuine consultation. This is particularly important where a Code Amendment relates to public land such as the Park Lands and Riverbank Precinct. In such instances, it is recommended that the public be included as a principal stakeholder with the same prioritisation as government agencies and parties with financial interests.

---

### CONSULTATION PRECEDENT

The 5000+ *An integrated Design Strategy of Inner Adelaide*<sup>vi</sup> included a public consultation process prior to development of outcomes to facilitate open conversations and ideas generation. It did not pre-suppose specific outcomes or seek to validate existing decisions but provided a genuine opportunity for the community to express its aspirations for the future development of Adelaide. This represents a best practice model for consultation.

---

## 3 DETAILED RESPONSE – PROPOSED SUBZONES

### 3.1 City Riverbank Zone

The draft policy for the City Riverbank Zone is generally supported and appear conducive to the development of a generous and high-quality public realm, with exception to specific notes as outlined:

- Expansion of the City Riverbank Zone to include areas of existing Park Lands is not supported. The Park Lands are a public asset, not a land bank for government development.
- PO1.1 includes accommodation in the list of land uses, which is supported on the proviso that the accommodation is solely for short stay purposes (i.e., a hotel). Long term accommodation within the Zone is not compatible with the existing and proposed publicly focused land use which should be prioritised within the Zone.
- PO 2.1 should be strictly applied, with DTS criteria added. Over-height provisions in the Subzones should be removed.
- Further expansion of the Biomedical Precinct beyond the area currently defined in the Health Subzone is not supported on the basis that it will result in further privatisation of the riverbank and that these uses are not compatible with the publicly focused entertainment and tourism land uses that are appropriate to the location.

### 3.2 Cultural Institutions Subzone

The draft policy for the Cultural Institutions Subzone is generally supported, except as noted below:

- The inclusion of student accommodation in the list of uses in PO1.1 is not supported. The inclusion of student accommodation in PO1.1 contradicts the inclusion of student accommodation in PO2.1, where it is listed as permitted as a limited secondary activity. Opportunities exist for more appropriate sites for student housing south of North Terrace, with significant supply and associated amenity already available in that location.

### 3.3 Entertainment Subzone

The draft policy for the Entertainment Subzone is supported, except as noted below. We recommend that the Planning policy for this subzone should focus on strengthening this precinct as the entertainment hub for Adelaide and exclude development that is primarily commercial (i.e., office buildings, retail outlets) or which substantially exclude public access.

- Permitting development of health, education and research facilities within the Entertainment Zone is not supported. This privatised development is at odds with existing use and may lead to restrictions being placed on events and other activities currently held within the subzone due to noise and security concerns.
- Extension of the Entertainment Subzone west of Montefiore Hill is not supported. This area should remain in the Adelaide Park Lands Zone. The areas that have been alienated provide opportunities for new green landscape and small-scale activation as permitted in the Adelaide Park Lands Zone, which could also screen the rail lines to the south.

### 3.4 Heath Subzone

We question the benefit of further development of the Biomedical Precinct between the rail lines and the river. Health and research facilities contribute little to the public realm or activation of the precinct and are largely closed to public access. The existing Biomedical Precinct buildings, including those developed by Adelaide University and UniSA, further reinforce the barrier created by the rail lines. We would recommend consideration of further extension of the Biomedical Precinct should be considered in the northwest section of the City, which has significant development potential. Alternatively, consider construction over the rail lines to facilitate connection between North Terrace and the River.

Development that extends the existing Biomedical Precinct over the rail lines and bridges this existing barrier between North Terrace and the River Torrens is strongly encouraged. This is most likely to deliver the desired outcome for the Health Subzone and provide capacity for expansion without extending west beyond Gaol Road and east into the Entertainment Subzone.

- Extension of the Health Subzone west of Gaol Road is not supported. This area should remain in the Adelaide Park Lands Zone. Accessible connections between the Park Lands and River and the health care facilities has been stated as an objective in the nWCH Masterplan and was also an objective in the nRAH development. The Health Subzone policy needs to enable this outcome to be realised, and this will be compromised by the re-zoning of these areas of Park Lands.
- Adaptive reuse of the Police Barracks and Old Adelaide Gaol for supportive health uses is not supported. However, adaptive reuse that fosters public engagement and is aligned with the significance of these heritage listed assets is strongly supported.
- PO 2.2 is not supported. Proposed development height is out of context with the existing development within the Subzone and the location within the Riverbank Zone, which forms part of the Park Land as established by Light.

- Construction of a car park in the approach to the Old Adelaide Gaol is not supported. Parking should not be permitted in areas currently defined as Park Lands, preservation of which should be prioritised. Alternative methods of providing access to the proposed activity centres should be considered or the proposed activities should be located on other more suitable sites if car parking is a core requirement for the development. The proposed site for the carpark will also significantly compromise the physical approach and views of the Old Adelaide Gaol site and primary entry.

### 3.5 Innovation Subzone

We recommend the direct application of the Lot 14 Masterplan as an assessment tool for the subzone.

- The density of proposed development is not supported. It will not provide the desired porosity between Frome Street and the Botanic Gardens.
- Retail development is not supported within the Innovation Subzone. The East End retail precinct is located adjacent to this Subzone and provides workers and visitors with a range of retail options.
- Commercial development should be restricted to small scale facilities directly related to the core cultural, research and education uses.
- Tourism accommodation is not supported within the Innovation Subzone. There is capacity to accommodate short term workers and visitors in existing and future hotel developments within the East End of the City and the inner eastern suburbs.
- PO 3.2 is not supported. It directly contradicts Innovation Subzone Do2 as well as other Performance Objectives for the Subzone. We question whether there is insufficient demand in Adelaide to warrant development of this scale outside the City.
- The transition zone between the developed area and the Botanic Gardens as shown on Updated Concept Plan 85 is insufficient to provide a 'natural Park Lands experience' as stated in PO 5.1.
- DTS Criteria for parking need to be included to explicitly define what is acceptable. The City of Melbourne Design Guide provides an example of the level of detail envisioned.

### 3.6 Riverbank Subzone

- Development of the north bank of the River Torrens is not supported. Tenancies within the Home Ground food precinct and the new entry to the Railway Station are unoccupied and we recommend the re-focus on activation of these existing assets on the south bank. These areas will be further augmented by the Festival Plaza development which includes significant retail and hospitality areas.
- The North Bank of the River Torrens should remain within the Park Lands Zone. It should not be included in the Riverbank Subzone.
- Further activation of the South Bank should focus on small scale development to screen the lower levels of the Convention Centre Carpark from the lawns adjacent the riverbank. Controlled development in this area would improve the transition of between the buildings and the landscape.

## 4 CONCLUSION

The potential of development within the draft Code Amendment presents significant risk to the key cultural, heritage and identity asset of Adelaide. Further investigation is required subject to spatial testing.

The Institute strongly advocates for the Draft Riverbank Precinct Code Amendment to be put on hold until an inclusive and comprehensive community consultation process is undertaken and supporting documents, including a Cultural Heritage Management Plan and a Cultural Heritage Masterplan for the Park Lands, are developed.

This will enable genuine engagement with the community and key stakeholders, provide the opportunity to develop an inclusive and robust planning framework for this key public asset and ensure that the resulting development is of high-quality and has strong community support.

## 5 RECOMMENDATION SUMMARY

1. Ensure rigorous articulated framework for shaping future development via assessment rubric and clear definitions of limitation.
2. Develop individual, detailed masterplans for each of the proposed project precincts. The masterplans need to inform proposed Code Amendments.
3. Review the impacts of the proposed Code Amendment against the State Planning Policies to ensure public policy and vision for Adelaide is maintained. Report findings in a rubric assessment matrix with clear justifications where any policies are compromised.
4. Remediate and activate underutilised and degraded assets first, prior to consideration of appropriate future use, development and zoning.
5. Prepare an overlay plan of the considered sites within the draft Code Amendment identifying overlap with National Heritage places to identify impact.
6. Prepare a Conservation Management Plan for the places of national heritage significance in accordance with *EPBC Act* and best practice outlined in the *Burra Charter*.
7. Assess adaptive reuse proposals for state heritage places, with reference to their Conservation Management Plans to ensure future use is compatible with heritage values of these places.
8. Prepare a Cultural Heritage Management Plan for the Park Lands and adopt a co-creation process with Kurna people prior to undertaking detailed master-planning, or zoning proposals.
9. Pre-engage with public, First National people and stakeholder in accordance with the principles of the Community Engagement Charter. Make engagement summary outcomes accessible as part of the Code Amendment consultation process.
10. City Riverbank Zone:
  - limit expansion into existing Park Lands,
  - define accommodation as 'short-stay accommodation' in the proposed land uses,
  - remove over-height provision within the subzones,
  - restrict expansion of the Biomedical Precinct.

---

11. Cultural Institutions Subzone:

- remove student accommodation from permissible land uses.

12. Entertainment Subzone:

- limit land use compatible with the identity of place as the 'entertainment hub' – exclude commercial, education, health land use,
- limit expansion into Park Lands.

13. Health Subzone:

- prioritise connection of city to river in future master-planning of precinct;
- limit expansion into parklands,
- consider appropriate use for state listed heritage assets that provide public access,
- review height and scale permissible in precinct in relation to context,
- relocate proposed parking area and consider other access options.

14. Innovation Subzone:

- apply Lot 14 Masterplan as an assessment tool for the precinct,
- prioritise connection between Frome Street and the Botanic Gardens,
- limit retail and tourist accommodation land uses in the subzone,
- restrict commercial land use in the subzone,
- ensure sight line from the Botanic Gardens to the Barr Smith Library is maintained where there is expansion into parklands,
- limit over-height provisions in the subzone,
- provide clearly defined DTS provision for car parking in the subzone.

15. Riverbank Subzone:

- prohibit development to the north bank of the river,
- prioritise activation of existing south bank assets,
- encourage future small scale development along the south bank of the river.



## REFERENCES

---

<sup>i</sup> Kingston, GS, *Adelaide Parklands Unique in the World*, November 1877, republished Adelaide Parklands Preservation Association Inc Newsletter December 1998, page 4.

<sup>ii</sup> Gehl, Jan, *Public space and public life: City of Adelaide: 2002*, Planning SA, South Australia Capital City Committee, Adelaide Council July 2002.

<sup>iii</sup> Australia ICOOS Incorporated International Council on Monument and Sites, Burra Charter, 2013. [Available online](#)

<sup>iv</sup> Read more:

[https://www.parliament.wa.gov.au/publications/tailedpapers.nsf/displaypaper/4012795a33bc56a5bb6ede844825848000165d6f/\\$file/2795.pdf](https://www.parliament.wa.gov.au/publications/tailedpapers.nsf/displaypaper/4012795a33bc56a5bb6ede844825848000165d6f/$file/2795.pdf) and <https://www.pressreader.com/australia/indesign-34kn/20191107/282080573767551>

<sup>v</sup> [https://plan.sa.gov.au/our\\_planning\\_system/instruments/community\\_engagement\\_charter](https://plan.sa.gov.au/our_planning_system/instruments/community_engagement_charter)

<sup>vi</sup> Read more: <https://apo.org.au/sites/default/files/resource-files/2011-12/apo-nid60027.pdf>