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CITY OF ADELAIDE

CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE

Agenda and Reports

for the meeting on

Tuesday, 5 November 2024

at 6.30 pm

in the Colonel Light Room, Adelaide Town Hall

Our Adelaide.
Bold.
Aspirational.
Innovative.

CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE
Meeting Agenda, Tuesday, 5 November 2024, at 6.30 pm

Members – The Right Honourable the Lord Mayor, Dr Jane Lomax-Smith

Councillor Noon (Chair)

Councillor Martin (Deputy Chair)

Deputy Lord Mayor, Councillor Snape and Councillors Abrahimzadeh, Couros, Davis, Elliott, Giles, Hou, Li and Dr Siebentritt

Agenda

Item **Pages**

1. Acknowledgement of Country

At the opening of the City Planning, Development and Business Affairs Committee meeting, the Chair will state:

'Council acknowledges that we are meeting on traditional Country of the Kaurna people of the Adelaide Plains and pays respect to Elders past and present. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.

And we also extend that respect to other Aboriginal Language Groups and other First Nations who are present today.'

2. Apologies and Leave of Absence

Nil

3. Confirmation of Minutes - 1/10/2024

That the Minutes of the meeting of the City Planning, Development and Business Affairs held on 1 October 2024, be taken as read and be confirmed as an accurate record of proceedings.

View public 1 October 2024 Minutes.

4. Declaration of Conflict of Interest

5. Deputations

6. Workshops

Nil

7. Reports for Recommendation to Council

7.1	Adelaide Park Lands Management Strategy - Towards 2036 for Approval	4 - 189
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7.4	Adult Entertainment Premises Code Amendment for Endorsement	238 - 325
7.5	Draft Social Infrastructure (Assets) Policy for Public Consultation .	326 - 342
7.6	City Safety Compliance and Enforcement Policy	343 - 369
7.7	Catalyst Site Policy Review Framework and Principles	370 – 379

8. Reports for Noting

Nil

9. Exclusion of the Public 380 - 383

In accordance with sections 90(2), (3) and (7) of the Local Government Act 1999 (SA) the City Planning, Development and Business Affairs will consider whether to discuss in confidence the reports contained within section 10 of this Agenda.

10. Confidential Reports for Recommendation to Council

10.1 Proposal to Initiate Waste Code Amendment [S90(3) (m)] 384 - 413

10.2 City of Adelaide Property Strategy [S90(3) (b), (d)] 414 - 463

11. Closure

Adelaide Park Lands Management Strategy - Towards 2036 for Approval

Tuesday, 5 November 2024

City Planning, Development and Business Affairs Committee

Strategic Alignment - Our Environment

Program Contact:
Sarah Gilmour,
Associate Director,
Park Lands, Policy & Sustainability

Public

Approving Officer:
Ilia Houridis,
Director, City Shaping

EXECUTIVE SUMMARY

The purpose of this report is to present the Adelaide Park Lands Management Strategy – Towards 2036 (APLMS) (**Attachment A**), to the Council for adoption.

Following community and stakeholder consultation (including with the Minister for Planning and the City of Adelaide), Kadaltilla has amended the APLMS based on the consultation undertaken and submissions received.

Kadaltilla approved the consolidated APLMS at its meeting on 24 October 2024 (Link 1), and a report on the matter is being furnished to the Minister for Planning and the City of Adelaide.

The APLMS is prepared and maintained by Kadaltilla / Adelaide Park Lands Authority (Kadaltilla). Kadaltilla must undertake a comprehensive review of the APLMS at least once in every five years. The current APLMS 2015-2025 was completed and adopted by the Minister and the City of Adelaide on 7 August 2017.

On 22 February 2024, Kadaltilla proposed to vary the management strategy through substitution with the APLMS in accordance with Section 18(4) and Section 18(12) of the *Adelaide Park Lands Act 2005* (SA) (the Act).

The review was undertaken on behalf of Kadaltilla by the City of Adelaide (CoA) with support from the Office for Design and Architecture SA (ODASA) and a Project Steering Committee which includes members from the City of Adelaide, adjoining Councils, Kaurna Yerta Aboriginal Corporation (KYAC), Department of Environment and Water (DEW) and Green Adelaide.

The proposal was referred to the Minister for Planning in February 2024, and the City of Adelaide, State authorities and adjoining Councils with a direct interest in the proposal in March 2024.

On 23 May 2024, Kadaltilla endorsed the draft APLMS - Towards 2036 for the purposes of undertaking public consultation (Link 2). Public consultation took place from 17 June to 9 August 2024. A public hearing was held at the Kadaltilla meeting on 25 July 2024. A workshop (Link 3) update and detailed Consultation Engagement Report (Link 4) on the public consultation were presented to Kadaltilla at its meeting on 26 September 2024 (Link 5). A summary table outlining the key changes made in response to community and stakeholder consultation is provided in Link 6.

A workshop on the draft APLMS - Towards 2036 was held with the City Planning, Development and Business Affairs Committee on 2 July 2024. A summary of the key changes arising from the feedback provided by the Council is provided in Link 7.

At its meeting on 24 October 2024, Kadaltilla approved the proposal to vary by substitution the APLMS in accordance with the *Adelaide Park Lands Act 2005*.

In accordance with Section 18 subsection (8) of the Act, the Minister and the City of Adelaide must confer on the report and proposal and may then adopt the proposal with or without amendment.

This report seeks approval from Council to confer with the Minister for Planning to adopt the APLMS.

Pending agreement between the City of Adelaide and the Minister for Planning to adopt the APLMS, finalisation of the APLMS is anticipated to occur in early 2025, including the legislated parliamentary processes and publication.

RECOMMENDATION

The following recommendation will be presented to Council on 12 November 2024 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Adopts the Adelaide Park Lands Management Strategy - Towards 2036 as contained in Attachment A to Item 7.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024.
2. Authorises the Chief Executive Officer, or delegate, to write to the Minister for Planning advising that Council adopted the Adelaide Park Lands Management Strategy - Towards 2036 as contained in Attachment A to Item 7.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024 and confer, via exchange of letters, on the report and proposal.
3. Authorises the Chief Executive Officer, or delegate, to make minor or typographical amendments to the document contained in Attachment A to Item 7.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024 for the purposes of finalising the documents.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Environment Deliver the Adelaide Park Lands Management Strategy (APLMS)
Policy	Section 18(12) of the *Adelaide Park Lands Act 2005* allows Kadaltilla to vary the management strategy by substituting a new management Strategy. Given the comprehensive nature of the review and the extent of proposed changes, APLMS – Towards 2036 substitutes the existing Adelaide Park Lands Management Strategy 2015 – 2025. Sections 18(4), (6), (7) and (8) of the Act, set out legislative requirements to vary the APLMS including: • Preparing a draft of the proposal. • Referring the proposal to the Minister, the City of Adelaide, and any State authority or adjoining council that has a direct interest in the proposal. • Amending the proposal. • Preparing a report and furnishing copies of the proposal to the Minister for Planning and City of Adelaide. • Adopting the proposal with or without amendment. • Laying copies of the proposal before both Houses of Parliament.
Consultation	At its meeting on 23 May 2024, Kadaltilla determined to undertake public consultation on the draft APLMS for an 8-week period commencing on 17 June 2024. In accordance with Section 18(4)(c) of the Act, Kadaltilla held a public meeting in relation to the proposal on 25 July 2024. At its meeting on 26 September 2024, Kadaltilla considered the outcomes of the public consultation on the draft APLMS. Following the public consultation Kadaltilla has, on the basis of consultation undertaken and submissions received, amended the APLMS and prepared a report on the matter.
Resource	CoA is undertaking the review of APLMS 2015 – 2025 on behalf of Kadaltilla.
Risk / Legal / Legislative	As required under Section 18(14) of the *Adelaide Park Lands Act 2005*, Kadaltilla must undertake a comprehensive review of the APLMS at least once in every five years as required under Section 18(14) of the *Adelaide Park Lands Act 2005.* The Strategy must contain the information set out in Section 18(3) of the *Adelaide Park Lands Act 2005 (SA).*
Opportunities	The review delivers the legislative requirement to review the APLMS every five years and provides an opportunity to ensure that the APLMS continues to address key themes contained in the APLMS, whilst contemporising these same themes.
24/25 Budget Allocation	The CoA's 2024/25 Annual Business Plan and Budget includes funding for a range of strategic priorities identified in the APLMS including: • $500,000 for lighting and footpaths renewals in Wellington Square / Kudnartu. • $250,000 for detailed design of the Light Square / Wauwi Master Plan. • $250,000 for detailed design of the Victoria Park / Pakapakapanthi (Park 16) Master Plan. • $352,845 for Botanic Catchment Water Course Rehabilitation. • $80,000 for an Adelaide Park Lands Strategic Water Resources Study. The APLMS – Towards 2036 recognises the financial commitment by the CoA to invest in Community Buildings in the Adelaide Park Lands.

Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	In accordance with the *Adelaide Park Lands Act 2005,* the APLMS must be reviewed every five years. Pending decision on the draft APLMS – Towards 2036 in 2024/25, the next review would be due in 2029/30.
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	The APLMS – Towards 2036 introduces new content relevant to the planning of, and investment in, the Adelaide Park Lands, including consideration of funding and investment pathways.

DISCUSSION

Purpose

1. Following community and stakeholder consultation (including with the Minister for Planning and the City of Adelaide), Kadaltilla (the Authority) has amended the APLMS based on the consultation undertaken and submissions received.

2. The consolidated APLMS – Towards 2036 was presented and adopted by Kadaltilla at its meeting on 24 October 2024 (Link 1).

3. The purpose of this report is to present the consolidated APLMS – Towards 2036 (APLMS) (Attachment A), to Council for its consideration and adoption.

    3.1. As allowed for under Section (18)(8)(b) of the Act, Council may refer the proposal back to the Authority for further consideration and, if appropriate, amendment and then subsequently adopt the proposal, with or without amendment, after taking into account any report or recommendation from the Authority

Background

4. At its meeting on 23 May 2024, Kadaltilla endorsed the draft APLMS - Towards 2036 being released for the purposes public consultation (Link 2).

5. Public consultation took place from 17 June to 9 August 2024.

6. The public consultation invited the community and key stakeholders from previous engagements to provide feedback on the draft APLMS – Towards 2036. Participants were able to share their input through various channels, including responding to survey questions, submitting written feedback, or attending engagement sessions and public hearings to provide their views in person.

7. A public hearing was held at the Kadaltilla meeting on 25 July 2024.

8. A workshop update (Link 3) and detailed Consultation Engagement Report (Link 4) on the public consultation were presented to Kadaltilla at its meeting on 26 September 2024 (Link 5).

APLMS – Towards 2036

9. Kadaltilla considered the proposed changes to the APLMS on 24 October 2024 (Link 1) under the consultation themes of:

    9.1. Biodiversity and First Nations

    9.2. Adelaide Park Lands Protection and Access

    9.3. Heritage and Cultural Values

    9.4. Built Form and Land Use

    9.5. Stormwater Management and Pathways

    9.6. Adelaide Park Lands Hubs and Major Events

    9.7. Community Facilities and Car Parking

    9.8. Governance and Legislative Context

    9.9. Design and Safety.

10. The APLMS is updated for consistency with recently developed and/or endorsed plans and strategies including the City Plan – Adelaide 2036, the draft Greater Adelaide Regional Plan, land tenure advice from the Surveyor General and multiple typographical, figure and image edits.

11. A summary table outlining the key changes made in response to community and stakeholder consultation is provided in Link 6.

12. A summary of the key changes arising from the feedback provided by the Council is provided in Link 7.

The Role of Council and the Minister (for Planning)

13. Having adopted the APLMS, in accordance with Section (18)(7)(a) and (b) of the *Adelaide Park Lands Act 2005*, Kadaltilla (the Authority) must furnish copies of the report ((incorporating the proposal, as finalised by the Authority) to the Minister and the City of Adelaide.

14. Pursuant to Section (18)(8) of the *Adelaide Park Lands Act 2005,* the Minister and the City of Adelaide must confer on the report (and proposal) and may then:

14.1. Adopt the proposal with or without amendment; or

14.2. Refer the proposal back to the Authority for further consideration and, if appropriate, amendment and then subsequently adopt the proposal, with or without amendment, after taking into account any report or recommendation from the Authority.

15. The purpose of this report is to seek Council's adoption of the APLMS (the proposal) and authorise the Chief Executive Officer, or delegate, to confer via exchange of letters with the Minster for Planning on the report (and proposal).

15.1. As allowed for under Section (18)(8)(b) of the Act, the City of Adelaide may refer the proposal back to the Authority for further consideration and, if appropriate, amendment and then subsequently adopt the proposal, with or without amendment, after taking into account any report or recommendation from the Authority.

16. Concurrently to Council's consideration of the APLMS, the report (and proposal) will be furnished to the Minister for Planning seeking adoption of the APLMS.

16.1. As allowed for under Section (18)(8)(b) of the Act, the Minister for Planning may refer the proposal back to the Authority for further consideration and, if appropriate, amendment and then subsequently adopt the proposal, with or without amendment, after taking into account any report or recommendation from the Authority.

17. Within 6 sitting days after the proposal is adopted by the Minister of Planning and City of Adelaide, the Minister for Planning must cause copies of the APLMS to be laid before both Houses of Parliament.

17.1. The laying of the APLMS before both Houses of Parliament is a procedural matter and does not provide the opportunity for either House of Parliament to review and comment on the adopted Strategy.

18. The adoption of the APLMS is completed upon tabling of the APLMS before both Houses of Parliament.

19. Council and the Minister must then ensure that copies of the revised APLMS are kept available for public inspection.

20. In accordance with the *Adelaide Park Lands Act 2005*, the APLMS must be reviewed every five years.

20.1. Pending a decision on the draft APLMS – Towards 2036 in 2024/25, the next review would be due in 2029/30.

DATA AND SUPPORTING INFORMATION

Link 1 – Kadaltilla / Adelaide Park Lands Authority Meeting – Agenda – Thursday, 24 October 2024

Link 2 – Kadaltilla / Adelaide Park Lands Authority Meeting – Agenda – Thursday, 23 May 2024

Link 3 – Draft Adelaide Park Lands Management Strategy (APLMS) - Towards 2036 - Consultation Summary Workshop

Link 4 – Draft Adelaide Park Lands Management Strategy – Towards 2036 - Consultation Engagement Report

Link 5 – Kadaltilla / Adelaide Park Lands Authority Board Meeting 26 September 2024

Link 6 – Summary of the key changes arising from community and stakeholder consultation

Link 7 – Summary of the key changes arising from feedback provided by Council

ATTACHMENTS

Attachment A – Adelaide Park Lands Management Strategy - Towards 2036

- END OF REPORT -









Adelaide Park Lands Management Strategy

Towards 2036

Government of South Australia

CITY OF ADELAIDE

Kadaltilla
Adelaide Park Lands Authority

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Minister's Foreword (Placeholder)

Subject to decision and final approval by the Minister.

Message from the Presiding Member



Dr Jane Lomax-Smith AM
Lord Mayor
Presiding Member

The Kadaltilla/Adelaide Park Lands Authority (Kadaltilla) is excited to introduce the **Adelaide Park Lands Management Strategy – Towards 2036** (the Strategy), a document that reflects Kadaltilla's collective vision for one of Adelaide's most precious features.

The Adelaide Park Lands are a masterpiece of urban design and serve as a remarkable example of nineteenth-century colonial planning. These beautiful green spaces, held in trust for the people of South Australia, invite individuals to walk, run, ride, explore, celebrate, and play across their diverse natural environments.

The Strategy is a joint State Government and Council owned document, which is prepared and maintained on their behalf by Kadaltilla. As stewards of this globally recognised open space, preserving and celebrating the Adelaide Park Lands is essential. The Strategy sets out a long-term vision for Adelaide's open space and provides guidance on how to protect and manage these areas through the next decade.

The Strategy promotes a balanced approach to decision-making around the Adelaide Park Lands, but ensures we are always striving to retain their natural, social, and recreational values.

Guided by the community's input, this Strategy lays out a bold vision for the Adelaide Park Lands, one that focuses on defending their environmental, cultural, and historical significance.

Approximately 3000 people provided their ideas, visions, and goals across many drop-in sessions, workshops, informal gatherings, online surveys, and presentations to help shape the Strategy. This invaluable feedback has enabled Kadaltilla to prioritise the initiatives that are of the most importance to our community.

As we look toward 2036, Kadaltilla recognises that the Adelaide Park Lands will become increasingly valuable as Adelaide's population increases. It is more important than ever to safeguard their natural, cultural, and historical significance, ensuring they remain vibrant and accessible for all.

Ultimately, this Strategy enables a bold and ambitious vision for the future of the Adelaide Park Lands, guiding decision-making and planning for their ongoing protection and enhancement.

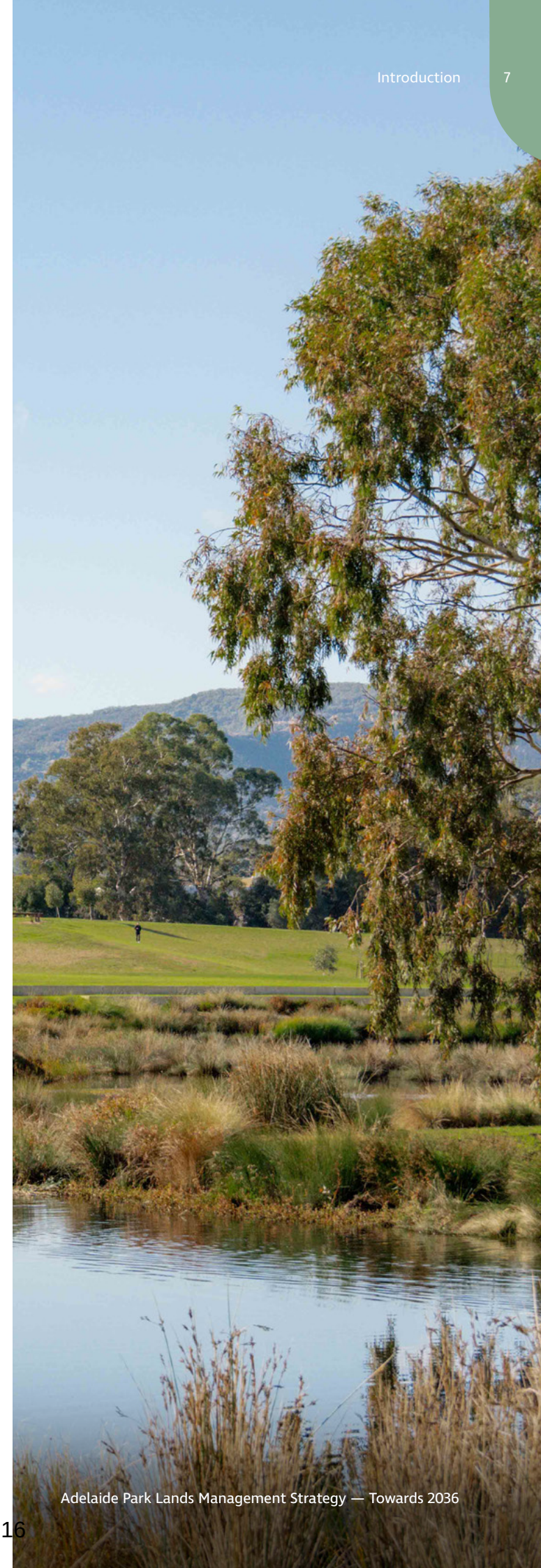
Adelaide Park Lands



Source: Metromaps Aerial Imagery 2024

Partnering to preserve and celebrate our precious Adelaide Park Lands

Adelaide Park Lands Management Strategy – Towards 2036 (the Strategy) has been developed by Kadaltilla/Adelaide Park Lands Authority in accordance with the requirements of the *Adelaide Park Lands Act 2005* to prepare a Management Strategy to determine the Adelaide Park Lands directions and priorities.




NIKE





This guide has been prepared to assist in understanding how the *Adelaide Park Lands Management Strategy – Towards 2036* can be used and provide a general overview of the Strategy's structure and content.

Part A — Background, governance, consultation

Part A provides the context, the purpose and objectives of the Strategy.

This section outlines why the Strategy was developed, the vision and Governance for the Adelaide Park Lands, and the consultation undertaken to inform it.

This section includes

- Vision
- Executive Summary
- Governance
- Consultation

Part B — Priorities, directions, goals

Part B provides the core directions and priorities for the Adelaide Park Lands as a system of open space. It describes the guiding strategies that will inform Kadaltilla, the Government of South Australia and the City of Adelaide's future planning of the Adelaide Park Lands under three goals.

- Goal 1. Places and Spaces
- Goal 2: Connections and Networks
- Goal 3: Natural Systems, Cultural Landscapes and Climate Resilience

The directions, priorities and goals inform infrastructure and strategic planning for the Adelaide Park Lands.

Part C — Implementation, partnerships, investment

Part C outlines how the Strategy will inform future implementation, partnerships, and investment in the Adelaide Park Lands.

The Precinct Plans form the basis for future detailed master planning of parks and precincts.

Part C sets out the intent for the Strategy to be implemented in partnership, including how the Adelaide Park Lands will help support the growth of the city and metropolitan Adelaide, its relationship to the Greater Adelaide Open Space System, areas of the Adelaide Park Lands that could return to the care and control of the City of Adelaide and an investment framework.

This section includes

- Adelaide Park Lands Precinct Plans
- Partnerships, Planning and Investment
- Greater Adelaide Open Space System
- Return Areas
- Investment Framework

Appendices

The appendices provide the reader with the land tenure (ownership) and leases and licences that exceed five years for the Adelaide Park Lands. These elements are requirements under the *Adelaide Park Lands Act 2005.* This section also includes the National Heritage Values for the Adelaide Park Lands and City Layout.

Kaurna Peoples Native Title Determination Area



Figure 1 Kaurna Peoples Native Title Determination Area

Acknowledgement of Country

The Kadaltilla/Adelaide Park Lands Authority (Kadaltilla) acknowledges the Kaurna people as the traditional owners of the Adelaide Plains and pays respect to Elders past and present. Kadaltilla recognises and respects the cultural heritage, beliefs and relationship which the Kaurna people have with the land and acknowledges that they are of continuing importance to the Kaurna people living today.

Kadaltilla extends that respect to other Aboriginal Language Groups and other Aboriginal and Torres Strait Islander peoples.



Caring for Country

Aboriginal and Torres Strait Islander cultures are the oldest living cultures in the world, and the Adelaide Plains landscape, including the areas now defined as the Adelaide Park Lands have been cared for and managed by the Kaurna people (Miyurna) for tens of thousands of years.

Respecting Kaurna Miyurna rights as Native Title holders, and their relationships with Country (Yarta), as well as taking an Aboriginal and Torres Strait Islander lens to planning and managing the Adelaide Park Lands as Yarta, benefits community health and wellbeing, education, cultural knowledge protection, and ecological resilience.

This means engaging with Kaurna Miyurna, including through site visits on Yarta and listening and integrating Kaurna knowledge into the planning, design and management of the Adelaide Park Lands.

The Adelaide Park Lands must provide opportunities for ongoing connection to Yarta for Kaurna and other Aboriginal and Torres Strait Islander peoples and provide places to share their rich and abiding cultures with visitors and the South Australian community.

Kaurna Miyurna rights, knowledge and living cultures are respected and valued recognising that the Adelaide Park Lands are part of Yarta and can be accessed and used by Aboriginal and Torres Strait Islander peoples to support their connection and reconnection with Yarta for cultural, social, spiritual and economic purposes.

The *Adelaide Park Lands Management Strategy – Towards 2036*, aims to promote the cultural values of the Adelaide Park Lands and respect Kaurna culture, heritage and wellbeing.

What have we already learned?

For more than 60,000 years, Aboriginal and Torres Strait Islander peoples have followed cultural practices, including the use of fire to care for their Country (the term 'Country' in this context refers to the cultural connection that Aboriginal and Torres Strait Islander peoples have with the lands of their ancestors).

The forced separation of Aboriginal and Torres Strait Islander peoples from their traditional lands, as well as European colonisation has drastically altered the Australian landscape. Including:

- Significant land and vegetation clearing
- Introduction of non-native flora and fauna
- Alternate land management practices.

This Strategy recognises the important role of cultural burning in urban areas. Cultural burns not only reduce the amount of fuel which can result in devastating bushfires, but these low and controlled burns produce smoke which is important for germination of seeds and regeneration of native plants.

A Kaurna cultural burn was held at Carriageway Park in Tuthangga (Park 17) of the Adelaide Park Lands on Friday 14 May 2021. The burn was a powerful example of healing together. It was the first cultural burn in an Australian capital city and the first on Kaurna Yarta (Country) since European colonisation.

The *Adelaide Park Lands Management Strategy – Towards 2036* supports Kaurna Miyurna Caring for Country and returning traditional practices such as cultural burning for management of the Adelaide Park Lands. These traditional practices will be guided by Kaurna Miyurna with support from the City of Adelaide.

> **"To be able to have fire in the City of Adelaide, what that does for me as an Aboriginal man, is it empowers me. It gives me strength, it lets me know that, hey we have a voice here and we're part of some of that decision making around what happens to our country on the Adelaide Plains."**
>
> **Allan Sumner**
> Kaurna, Ngarrindjeri, Yankununytjatjara man

Indigenous Weather Knowledge - Kaurna Calendar

The Adelaide Park Lands provide a landscape to observe seasonal change occurring throughout the Adelaide plains. The Kaurna calendar recognises four distinct weather periods, as well as winds which indicate seasonal change.

Warltati - Summer
January to March

Hot season
Warlta – Hot, heat and warmth

Pulturru
Dry breeze

Parnati – Autumn
April to June

Windy season
Waitpi - Windy

Pukarra
North/west wind

Kudlila – Winter
July to September

Wet season
Kudlinthi – To wash the earth

Wartapukarra
North/west wind, tempestuous weather

Wirltuti – Spring
October to December

Mild warm season
Wirltu – The Eagle's Foot constellation (the Southern Cross)

Purta
To burn and blaze/rage like a storm (refers to the seasonal winds)



Figure 2 Kaurna Calendar

Source: Australian Government – Bureau of Meteorology / Permission to use the Kaurna seasonal calendar and related information on the Indigenous Weather Knowledge website is given by the Elders/Directors of Kaurna.



Part A

Background
Governance
Consultation

Adelaide Park Lands Snapshot

Situated on the Adelaide Plains between the Mount Lofty Ranges and the Gulf St Vincent, Adelaide is located on Kaurna Yarta (Kaurna Country) and is the capital city of South Australia.

Covering 932 hectares, the Adelaide Park Lands are a nationally and internationally recognised network of parks.

The Adelaide Park Lands, Squares and City Layout provides a tangible and direct lineage back to the earliest planning and establishment of the settlement of South Australia, a point of difference to other major Australian settlements.

The Adelaide Park Lands and City Layout is inscribed on the Australian National Heritage List as a place of outstanding national heritage significance. It was founded on Edward Wakefield Gibbon's principles of Systematic Colonisation and embodies Colonel William Light's 1837 plan defined by its layout of North and South Adelaide incorporating gridded street pattern (including hierarchy of roads), six town squares separated by the River Torrens/Karrawirra Pari and encircled by the Adelaide Park Lands.

The landscaping and beautification of the Adelaide Park Lands has a long history, with significant influence of design, formal gardens, tree planting and maintenance being influenced by William O'Brien (1861–1874), William Pengilly (1867–1883), John Ednie Brown (1878–1890) and August Wilhelm Pelzer (1899–1932) who were appointed as City Gardeners. Many of these influences are still evident today.

Today the Adelaide Park Lands consist of 29 individual Parks and six City Squares all with a variety of different features and facilities that form the heart of the Greater Adelaide Open Space System (formerly the Metropolitan Open Space System) for Greater Metropolitan Adelaide.

The Adelaide Park Lands form a cohesive network of open spaces that are managed at a whole of Park Lands scale, in precincts, and at individual park scale.

The City of Adelaide is within the Green Adelaide urban landscape management region which contains 17 metropolitan councils. Green Adelaide works towards a cooler, greener, wilder and more climate-resilient metropolitan South Australia. Green Adelaide led the successful application for Adelaide to be awarded National Park City status in 2021. Adelaide is the first city in Australia and the second in the world to have this status with an aim to improve liveability by connecting people with nature through everyday actions.

Data and Insights

Adelaide Park Lands Allocation

The following figures have been derived using Geographical Information Systems (GIS) and are based on the registered Adelaide Park Lands Plan.

Adelaide Park Lands (Managed by City of Adelaide)	691 ha
Adelaide Park Lands Roads (Managed by City of Adelaide)	70 ha
Adelaide Park Lands (Managed by Government of South Australia)	171 ha
Adelaide Park Lands Plan (Total)	932 ha

Figure 3 Adelaide Park Lands Allocation

Kaurna Yarta

- Kaurna Kardla Parranthi (cultural burn) held in Carriageway Park/Tuthangga (Park 17)
- Annual Kids on Country event held in G S Kingston Park/Wirrarninthi (Park 23)
- Created the Place of Reflection in Rymill Park/Murlawirrapurka (Park 14)

Biodiversity (Survey 2024)

- 12% of the Adelaide Park Lands are classified as Key Biodiversity Areas
- 7 Key Biodiversity Areas
- High diversity of native habitats and species
- 337 tree species
- Over 250 native plant species
- 5 pre-European ecological communities
- 12 threatened or near-threatened species
- 7 microbat species, and 71 native bee species, including the discovery of at least 2 new species of bees



Vision

Located on Kaurna Yarta, the Adelaide Park Lands support our environment, provide connections to nature and offer places for people to participate in events, cultural experiences, sporting and recreational activities. We will work together to enhance and protect the Adelaide Park Lands for future generations.

Adelaide Park Lands Trees (2022 audit)

- 56,022 trees surveyed
- 33.9% of the Adelaide Park Lands are covered by tree canopy
- Canopy cover has increased from 27.3% to 33.9% in the period 2015 – 2022
- 72% of the total City of Adelaide tree canopy is located in the Adelaide Park Lands

Water Use

- 185 hectares of irrigated area
- 71 points provide recycled water for irrigation, water features and buildings
- 775 megalitres of recycled wastewater used to irrigate Adelaide Park Lands open spaces in 2022
- On average 220 megalitres of water is extracted from River Torrens/Karrawirra Pari to irrigate the North Adelaide Golf Course

Aquatic Ecosystems

- 4 major aquatic habitats (river, lake, creek, wetland)
- 8 native fish species, 2 native turtle species and yabbies found in River Torrens/Karrawirra Pari
- 1 native aquatic mammal, Rakali (water rat)
- 50 distinct riparian vegetation associations
- 1 sighting of the short-finned eel (Anguilla australis above Torrens Weir (very rare occurrence)
- 23 native plant species

Urban Stormwater

- 5,260 megalitres of urban stormwater is discharged into Adelaide Park Lands water courses every year
- 279 tonnes of gross pollutants were captured by traps before entering Adelaide Park Lands watercourses in 2021
- 143 tonnes of gross pollutants (litter, leaves and branches) were collected by traps stopping them from entering Karrawirra Pari

Adelaide Park Lands Hardstand and Built Form (2023 audit)

- 3.4% of the total Adelaide Park Lands is hard surface (not including roads)
- 4.1% of the total Adelaide Park Lands is built form
- 411 buildings

Adelaide Park Lands Lease/Licences (2024)

- 31 leases which exceed five years (including rights of extension)
- 57 lease/licences for sporting facilities
- 17 leases for community business purposes
- 9 ministerial leases/licences
- 100+ event licences granted annually

Adelaide Park Lands Facilities

- 28 formal gardens
- 13 playgrounds
- 2 skate parks

Sporting Facilities

- 36 general sports fields
- 35 cricket pitches
- 4 basketball facilities (5 leased courts, 3 community courts and 3 half courts)
- 5 netball facilities (32 leased courts and 2 community courts)
- 22 tennis facilities (83 leased courts and eight community courts)

Events

- 135 medium/major events held (2023)

Access and Connections

- 19.5km Adelaide Park Lands Trail
- 15 on-ramps connecting Metropolitan Adelaide to Adelaide Park Lands and the city
- Sealed and unsealed pathways

Adelaide Park Lands Car Parking (2022 audit)

Car parking adjacent to the Adelaide Park Lands

- 6,478 spaces of on-street parking managed by City of Adelaide
- 1,318 spaces of on-street parking (managed by adjoining councils/other authorities)

Car parking on the Adelaide Park Lands

- 2,346 spaces – designated car parks
- 4,929 spaces – temporary/event/permit parking
- 1,413 spaces – designated car parks (managed by other authorities)

City of Adelaide Operational Management of the Adelaide Park Lands

- 25,000+ rose bushes pruned annually
- 60,000 annuals grown and planted annually
- 32 garden beds with 4 different displays annually
- 540 ha of turf mown and over 150km of turf edged annually
- 75km of shared paths and bike tracks maintained
- 10,500 irrigation sprinklers maintained
- Over 15,600m3 of green organics recycled annually

Existing Uses of the Adelaide Park Lands



Source: City of Adelaide 2024



Adelaide Park Lands Definitions

The following definitions have been developed with guidance from the Statutory Principles of the *Adelaide Park Lands Act 2005* and will provide consistency when referencing to the Adelaide Park Lands.

Adelaide Park Lands
In accordance with the *Adelaide Park Lands Act 2005*, Adelaide Park Lands refers to the land shown on the Adelaide Park Lands Plan (GRO) (refer to Appendix A – Adelaide Park Lands Tenure) and includes the City Squares; Brougham Gardens/Tantutitingga (Park 29) and Palmer Gardens/Pangki Pangki (Park 28); roads running through or bordering the Adelaide Park Lands; and any other land vested in or under the care, control or management of, the Crown, a state authority or a local government body.

The Adelaide Park Lands do not include:

1. Parliament House, the premises known as Old Parliament House, or the land appurtenant to Parliament House, or Old Parliament House
2. Government House or the land appurtenant to Government House
3. Any land vested in the Commonwealth, or an agency or instrumentality of the Commonwealth.

Park Lands Purposes
Adelaide Park Lands Purposes align with the Statutory Principles outlined under section 4(1) of the *Adelaide Park Lands Act 2005*, including:

- The Adelaide Park Lands should be held for the public benefit of the people of South Australia, and should be generally available to them for their use and enjoyment (recognising that certain uses of the Adelaide Park Lands may restrict or prevent access to particular parts of the Adelaide Park Lands)
- The Adelaide Park Lands reflect and support a diverse range of environmental, cultural, recreational and social values and activities that should be protected and enhanced.

Adelaide Park Lands uses that do not meet this definition should be limited and where appropriate returned to Park Lands Purpose.

Restricted Public Access (Alienation)
Restricted Public Access (Alienation) refers to areas of the Adelaide Park Lands which are not publicly accessible.

Permanent Net loss of Adelaide Park Lands
The Adelaide Park Lands Plan is a registered plan through the General Registry Office (GRO).

A 'net loss' of the Adelaide Park Lands would occur if the boundary of this plan is amended resulting in land currently being registered within the Plan being removed from the Plan.

Return to Publicly Accessible Adelaide Park Lands
Land registered within the Adelaide Park Lands Plan that has previously been used for a purpose that does not meet the definition of a Park Lands Purpose being permanently returned to the public for a 'Park Lands Purpose'.

Executive Summary

Kadaltilla/Adelaide Park Lands Authority



Dr Jane Lomax-Smith AM
Lord Mayor
Presiding Member



Elinor Walker
Deputy Presiding Member



Justyna Jochym



Mitzi Nam



Ashley Halliday



Allison Bretones



Ben Willsmore



Stephanie Johnston



Craig Wilkins



Keiran Snape
Deputy Lord Mayor
Councillor

The Kadaltilla/Adelaide Park Lands Authority (Kadaltilla) is the principal advisor to the City of Adelaide and the Government of South Australia on the protection, management, enhancement, and promotion of the Adelaide Park Lands. Kadaltilla is established pursuant to section 5 of the *Adelaide Park Lands Act 2005 (SA)* and operates as a subsidiary of the City of Adelaide, pursuant to section 42 of the *Local Government Act 1999 (SA)*. Kadaltilla acts in accordance with its Charter and the *Adelaide Park Lands Act 2005 (SA).*

On 11 May 2023, the Minister for Planning approved a change to Kadaltilla's Charter so that it would be branded as the 'Kadaltilla/Adelaide Park Lands Authority'(Kadaltilla).

Kadaltilla Membership:

Pursuant to section 6 of the *Adelaide Park Lands Act 2005*, membership of the Kadaltilla/Adelaide Park Lands Authority comprises:

- The Lord Mayor (as Presiding Member) or, if the Lord Mayor chooses not to be a member of Kadaltilla, a person appointed by the City of Adelaide (as the Presiding Member)
- Four other members appointed by the City of Adelaide
- Five members appointed by the Minister (one of whom will be the Deputy Presiding Member).

Adelaide Park Lands Management Strategy – Update

The Adelaide Park Lands Management Strategy (the Strategy) has been developed by Kadaltilla/Adelaide Park Lands Authority and sets the strategies, projects and planning considerations that will be used by Kadaltilla/Adelaide Park Lands Authority, the City of Adelaide, the Government of South Australia, cultural institutions, and community stakeholders to guide decisions relating to the Adelaide Park Lands.

Using a spatial planning approach and focusing on key themes identified through stakeholder and community

consultation, the Strategy provides a bold vision towards 2036 for the overall enhancement and protection of the Adelaide Park Lands.

The Strategy relates to all land managed by state agencies, authorities and City of Adelaide in the Adelaide Park Lands Plan and aims to:

1. Protect the integrity of the Adelaide Park Lands National Heritage Values
2. Manage the Adelaide Park Lands in an environmentally and financially sustainable manner
3. Increase the community's use of the Adelaide Park Lands
4. Ensure the Adelaide Park Lands are widely accessible to the public
5. Safeguard and celebrate the natural, cultural and recreational values of the Adelaide Park Lands
6. Improve the quality of landscapes and facilities
7. Improve the community's awareness of the natural and cultural heritage of the Adelaide Park Lands through interpretation.

In planning for the future of the Adelaide Park Lands the Statutory Principles of the *Adelaide Park Lands Act 2005* (the Act) must be observed.

a. The land comprising the Adelaide Park Lands should, as far as is reasonably appropriate, correspond to the general intentions of Colonel William Light in establishing the first Plan of Adelaide in 1837.
b. The Adelaide Park Lands should be held for the public benefit of the people of South Australia, and should be generally available to them for their use and enjoyment (recognising that certain uses of the Park Lands may restrict or prevent access to particular parts of the Park Lands).
c. The Adelaide Park Lands reflect and support a diverse range of environmental, cultural, recreational and social values and activities that should be protected and enhanced.
d. The Adelaide Park Lands provide a defining feature to the City of Adelaide and contribute to the economic and social well-being of the city in a manner that should be recognised and enhanced.
e. The contribution that the Adelaide Park Lands make to the natural heritage of the Adelaide Plains should be recognised, and consideration given to the extent to which initiatives involving the Park Lands can improve the biodiversity and sustainability of the Adelaide Plains.
f. The State Government, state agencies and authorities, and the City of Adelaide, should actively seek to co-operate and collaborate with each other in order to protect and enhance the Adelaide Park Lands.
g. The interests of the South Australian community in ensuring the preservation of the Adelaide Park Lands are to be recognised, and activities that may affect the Park Lands should be consistent with maintaining or enhancing the environmental, cultural, recreational and social heritage status of the Park Lands for the benefit of the state.

The Strategy takes into account a range of trends and changes affecting the Adelaide Park Lands, including: climate, population growth in City of Adelaide and Greater Adelaide, and increasing demand for use. It also takes into account a growing demand for their protection due to public recognition of their uniqueness.

As the heart of our vibrant state, Adelaide is immersed in the Adelaide Park Lands which are a defining feature of the city and all it has to offer. Beyond the picturesque landscapes of high biodiversity and heritage value, arts and music festivals, rich cultural heritage, major sporting and cultural events, the Adelaide Park Lands are a much-loved natural asset that must be protected for future generations.

As the venue for many of Adelaide's and South Australia's premier events and tourist attractions, the Adelaide Park Lands are critical to promoting and enhancing the social, cultural and economic life of the city.

The Strategy secures this future and responds to the critical challenges of:

- Embedding Kaurna culture
- Respecting and acknowledging the past
- Improving climate resilience
- Learning from management of parks across the world.


Welcome
to
Nyon
Zoo

Kadaltilla Strategic Plan

Kadaltilla's Strategic Plan 2024–2028 includes the following guiding principles and pillars:

Guiding Principles

- Preserve and strengthen the integrity of the Adelaide Park Lands
- Promote the values of the Adelaide Park Lands – as Adelaide's defining feature, and an internationally unique asset
- Partner with Council and the state government to advocate the benefits of the Adelaide Park Lands
- Advise government at all levels on the management and usage of the Adelaide Park Lands for the benefit of all South Australians.

Pillars



Figure 4 Kadaltilla Strategic Plan Pillars

Governance

Governance of the Adelaide Park Lands is shared between state government and the City of Adelaide. Kadaltilla/Adelaide Park Lands Authority is the principal advisor to the state government and the City of Adelaide on the Adelaide Park Lands and is responsible for preparing the Adelaide Park Lands Management Strategy.

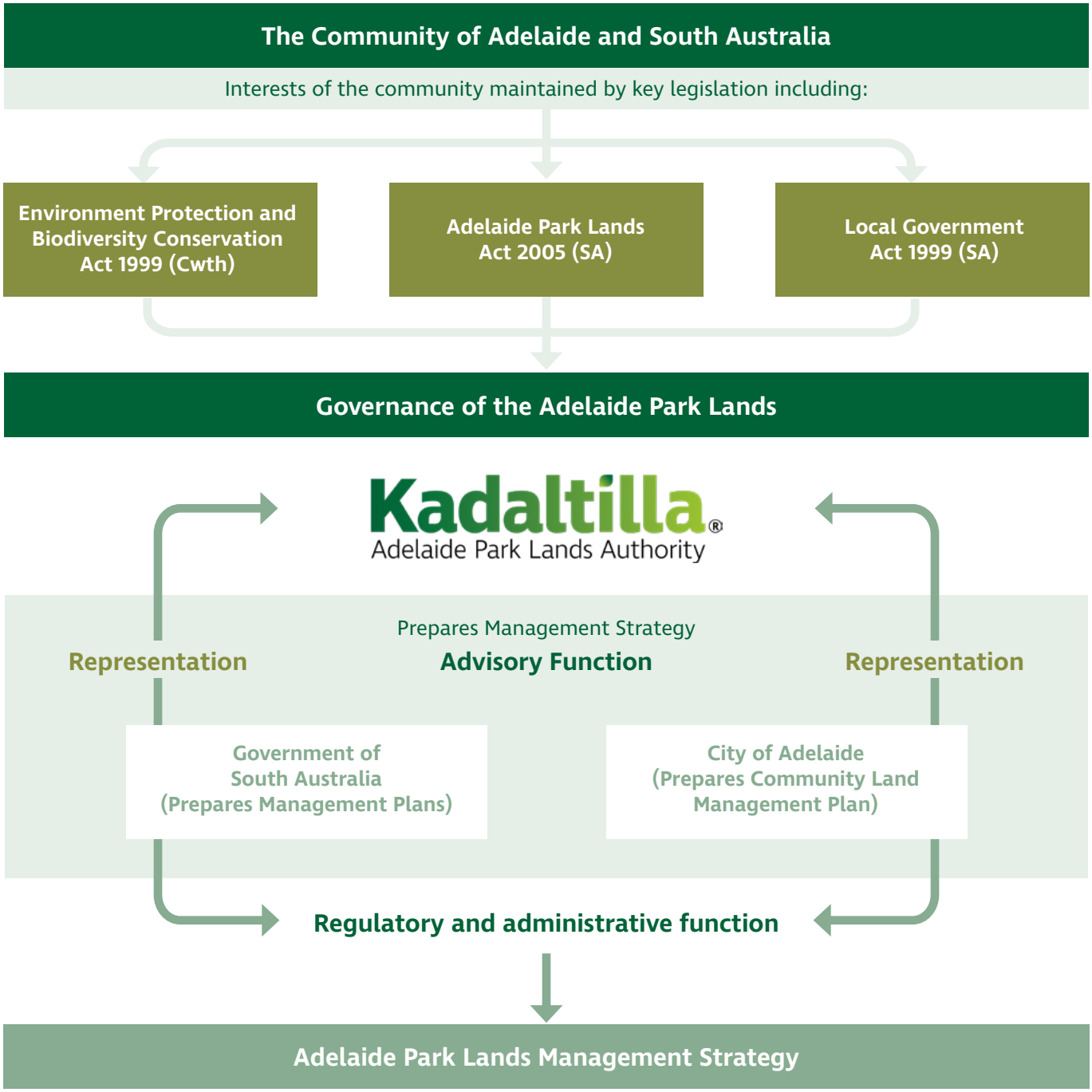


Figure 5 Adelaide Park Lands Governance

Consultation

The Strategy has been informed by extensive community and stakeholder engagement where we gathered thousands of individual comments and ideas.

To deliver on what we heard, the Strategy retains core strategies from the Adelaide Park Lands Management Strategy 2015–2025 whilst providing additional opportunities for the enhancement and protection of the Adelaide Park Lands.

To share the Strategy as well as provide up-to-date data about the Adelaide Park Lands, at different scales, the update includes an interactive digital version accessible for the community.

Community and stakeholder engagement included

- 2 drop-in sessions
- 10 workshops
- One informal gathering
- 3 online surveys
- 4 presentations
- Monthly Steering Group meetings

We heard from

- 18 stakeholder groups
- 246 forum attendees
- 356 community submissions
- 2,500 YourSay comments

Listening to Kaurna

- Relationship with Kaurna Yerta Aboriginal Corporation



What we learnt from you

We heard that the Adelaide Park Lands play a vital role in creating a healthy, respectful and vibrant lifestyle for Adelaide and South Australia.

Places and Spaces

- Mental health and wellbeing
- Connection and community spaces
- Improve existing and create new facilities

Natural Systems, Cultural Landscapes and Climate Resilience

- Kaurna land management and culture
- More natural spaces
- Climate resilience
- Health of Karrawirra Pari

Connections and Networks

- Safety
- Active transport
- Connections to inner metropolitan Adelaide

Partnerships, Planning and Investment

- Better governance
- Protect for future generations
- More volunteers and community involvement
- Shared investment


ADELAIDE
CITY OF



Part B

Priorities
Directions
Goals

Design Quality

Design quality relates to the 'look and feel' of the natural environment, places and spaces, as well as how successfully they meet the needs of the people who use and experience them.

High quality design helps to improve our quality of life, attract investment and reduce our impact on the environment. Within the Adelaide Park Lands, designs for natural landscapes, the upgrade or redevelopment of community buildings and infrastructure must respond to their site and context, sitting comfortably within and enhancing the broader experience of its park setting.

South Australia's Principles of Good Design

These Principles help us recognise, discuss and support the role that design plays in making our buildings and places better for people, the environment and economy.

Context
Good design is contextual because it responds to the surrounding environment and contributes to the existing quality and future character of a place.

Inclusive
Good design is inclusive and universal because it creates places for everyone to use and enjoy, by optimising social opportunity and equitable access.

Durable
Good design is durable because it creates buildings and places that are fit-for-purpose, adaptable and long-lasting.

Value
Good design adds value by creating desirable places that promote community and local investment, as well as enhancing social and cultural value.

Performance
Good design performs well because it realises the project potential for the benefit of all users and the broader community.

Sustainable
Good design is sustainable because it is environmentally responsible and supports long-term economic productivity, health and wellbeing.

Source: Office for Design and Architecture SA

Crime Prevention Through Environmental Design (CPTED)

The Adelaide Park Lands will be designed taking the principles of Crime Prevention Through Environmental Design into consideration, including but not limited to supporting sight lines through vegetation placement and management.

Universal Design

Universal design principles ensure that as many people as possible of all ages and abilities can use a space. For Adelaide Park Lands it means planning and design is inclusive, healthy and safe for everyone to use as part of their everyday life. This includes design that responds over time to changing needs and values, facilitating more opportunities for participation and enjoyment of the Adelaide Park Lands. For example, increasing female participation in sport and considering the needs of children.





This Strategy contains three goals that guide the Adelaide Park Lands directions and strategies.

Planning for the Adelaide Park Lands occurs at a Park Lands wide level as well as at a precinct level.

The Park Lands wide strategies have been grouped under three goals.

Adelaide Park Lands Directions and Priorities

Goal 1

Places and Spaces

Places of activity, creativity and tranquillity for everyone that support our changing lifestyles, health and wellbeing; offer diverse landscapes and natural beauty and provide a range of sport, recreational, sensory and stimulating experiences.

Goal 2

Connections and Networks

A system of connected and legible places and spaces enabling safe movement via paths and trails linking the city to the suburbs, hills and coast.

Goal 3

Natural Systems, Cultural Landscapes and Climate Resilience

Places that thrive in the face of a changing climate and celebrate Adelaide's unique natural and cultural heritage.





Goal 1
Places and Spaces

Goal 1 — Places and Spaces

Strategies

The Adelaide Park Lands are a place to meet and enjoy diverse experiences

Strategy 1.1
Create a network of hubs that respond to the needs of growing and changing communities in the city and neighboring suburbs to create spaces for all South Australians and visitors to enjoy.

Strategy 1.2
Create places and attractions that set the Adelaide Park Lands apart.

Strategy 1.3
Promote the Adelaide Park Lands as a visitor and tourist destination.

Strategy 1.4
Upgrade or redevelop community buildings that provide for a diversity of uses including recreational, sporting, educational and cultural uses that prioritise community access and inclusion.

Strategy 1.5
Create healthy ecosystems that encourage appreciation, connection and use and improve health, wellbeing and liveability.

The Adelaide Park Lands will host diverse events, from small to large, in more places more often

Strategy 1.6
Create spaces to accommodate cultural, sporting, artistic and recreational events of varying types and sizes that are planned and delivered to minimise environmental impacts and that promote active and public transport.

Strategy 1.7
Provide both permanent and temporary infrastructure to attract and service world-class events in the Adelaide Park Lands.

The Adelaide Park Lands are Adelaide's hub for sport and recreation

Strategy 1.8
Strengthen the role of the Adelaide Park Lands as a regional destination for competitive sport and a variety of active and passive forms of recreation.

Strategy 1.9
Optimise the community use of sport and recreation areas outside formal game and training times.

Community Buildings

Community buildings in the Adelaide Park Lands consist predominantly of sport and recreation, public amenity buildings and small-scale structures. These facilities are extensively utilised by community sport and recreation groups, schools, and the community.

As community buildings reach the end of their useful asset life, they may no longer respond to community needs. Consideration of the future of these buildings and how their upgrade or redevelopment can best serve user groups and the public will be imperative.

The City of Adelaide has committed to a program of annual investment to upgrade or redevelop community buildings in the Adelaide Park Lands so that community buildings respond to current and future needs. Joint investment in the upgrade or redevelopment of community buildings will be required in order to provide exemplary development outcomes.

Community building upgrades or redevelopment will be prioritised based on asset condition, functionality and the capacity of the building to benefit multiple eligible community organisations into the future.

Community buildings will be of an appropriate height and form within their landscape context including consideration of topography, vegetation, tree canopy, sight lines to adjacent heritage and built forms, balanced with a building's intended use.

Community buildings will be created as welcoming spaces that offer the facilities required to meet community expectations, changing values and needs and minimum sporting code requirements for the intended use.

Sharing resources, services and facilities through collaboration will help create more sustainable and efficient community buildings, as well as provide opportunities to increase diversity of activity and maximise investment in the Adelaide Park Lands. Community buildings will support a range of community organisations including sport and recreation clubs, community education and community service providers. This will ensure that buildings are activated throughout the day and evening, providing opportunities for people to play, learn and interact with the Adelaide Park Lands.

Public Amenities

Public amenities (toilets) in the Adelaide Park Lands will be designed to accommodate diverse needs and support the participation of all community members in the Adelaide Park Lands through inclusion of a range of appropriate facilities and universal design.

Public toilets should be well sited, conveniently located to enhance community activity and visitor enjoyment. They should consider both current and future needs.

The redevelopment of public amenities should, where possible, provide for an even distribution of facilities throughout the Adelaide Park Lands and areas of high use.

Design, position and management of public amenities will ensure that everyone feels included and safe including at night and/or when they are alone.

Public amenities shall complement their Adelaide Park Lands setting and where appropriate be incorporated into community buildings.

Hubs

Hubs are a combination of open space elements that complement surrounding uses and landscape character, and support people to visit and prolong their stay in the Adelaide Park Lands.

The Adelaide Park Lands contain a range of existing hubs, such as the one in Bundey's Paddock/Tidlangga (Park 9), which includes barbecue facilities, picnic tables, shelter and play features. An upgrade of existing or development of future hubs within the Adelaide Park Lands will respond to the needs of growing and changing communities and age groups in the city and neighbouring suburbs. Hubs will vary in what they include and be designed to respond to community needs and climate change impacts.

Hubs may be complementary to community buildings or exist on their own. Where a community building is proposed, consideration should be given to the provision of a hub to support active outdoor recreation and passive relaxation. This will optimise the benefits from community buildings and support the improved health and wellbeing of the community.

Hubs may include a combination of the following elements:

- Play features
- Natural shaded areas
- Landscaped setting
- Picnic setting
- Seating
- Open shelter or pavilion (where there is community support or need)
- Rubbish bins
- Barbecues
- Fitness equipment
- Wayfinding and interpretive signage
- Public art
- Bicycle parking, pump, and repair stations
- Drinking fountains
- Lighting for evening use and safety
- Defibrillator
- Event infrastructure – such a power and water supply.

Formal Parks

Formal Parks offer high levels of amenity to attract users and encourage them to stay, providing places for respite with comfort and facilities, and areas for activity, play and amusement. They are well connected to the surrounding suburbs and the city and generally include sustainably irrigated open space for activity and play opportunities.

Formal Parks often provide services and facilities to attract, and in turn, cater for high levels of visitation. Formal Parks complement the existing cultural landscapes within the Adelaide Park Lands and create new landscapes that reflect our diverse cultural identity, offer beauty and delight, and provide opportunities for active and non-active recreation. Formal Parks provide opportunities for socialisation and the development and strengthening of communities and our collective identity.

Formal Parks include ornamental garden areas containing both native and exotic plant species and may include paved plazas and opportunities for events of various sizes.

Sport and Recreation

The Adelaide Park Lands is the home of metropolitan sport and caters for the needs of organised competitive sport, as well as more casual sporting pursuits and informal recreation opportunities.

Sporting areas in the Adelaide Park Lands typically consist of large areas of irrigated open space for ovals and pitches, hard surface and courts, and are partially bounded by trees providing a visual backdrop and shade for spectators.

Recreation areas include riparian corridors, walking and cycling trails, formal and informal open spaces.

The Adelaide Park Lands will continue to provide for sport and recreation opportunities and prioritise open accessible spaces for the public to enjoy outside of programmed sport and recreation times.

Identified through master planning, increasing the offering of active recreation facilities will provide residents and visitors access to infrastructure such as running loops, urban nature trails and equipment-based exercise. These offerings will be in close proximity to community buildings, Adelaide Park Lands Trail and public transport networks.

Acknowledging that certain uses may temporarily restrict access to particular parts of the Adelaide Park Lands ensures that uses such as organised sport can occur.

Playspaces

The Adelaide Park Lands are home to a number of highly valued playspaces which are used by city residents and visitors to the Adelaide Park Lands.

Planning for the renewal of playspaces will be identified through master planning of parks and precincts and provide the opportunity for innovation and contemporary design considerations to achieve interesting and dynamic outdoor playspaces.

Playspaces in the Adelaide Park Lands will be designed to:

- Consider Kaurna culture and heritage
- Be equitable, inclusive, accessible and promote flexible use and incorporate elements that allow for challenge and risk, augmented, intergenerational and nature play
- Provide diversity in learning and play experiences and minimise duplication of play experiences with adjoining councils
- Where appropriate, use the natural landscape features as the basis for play, including creeks and water bodies and other natural systems and minimise the use of non-natural materials, elements and impervious surfaces
- Where appropriate, playspaces will be linked to the Adelaide Park Lands Trail, within close proximity to active transport or co-located with other facilities, such as community buildings.

Events

With a dynamic cultural life, Adelaide has an enviable reputation as one of the world's most liveable cities. It hosts a year-round calendar of events and activities that delight, inspire and engage local, national and international audiences.

The Adelaide Park Lands offers a wonderful backdrop for a huge variety of events. Its diverse range of beautiful open spaces host major events through to small-scale community events and weddings.

Acknowledging that certain uses may temporarily restrict or prevent access to particular parts of the Adelaide Park Lands ensures that uses such as ticketed events can occur.

Indicator	Target	Baseline
Community Access	Return Helen Mayo Park/Tulya Wardli (Park 27C) to Park Lands Purpose	Limited community access and use
Landscape Types	Clearly identified landscape types appropriate to location	Five pre-European typologies

Figure 6 Places and Spaces – Targets





Priorities

The following new moves are identified to guide improvements towards 2036:

Helen Mayo Park/Tulya Wardli (Park 27C)
Deliver a master plan and commence return of Helen Mayo Park/Tulya Wardli (Park 27C) to an Adelaide Park Lands destination connecting the North Terrace Health and Education Precinct and Karrawirra Pari to the city.

New Women's and Children's Hospital Integration
The site will be developed over the next 10 to 15 years and requires integration and connectivity within the wider Bonython Park and Riverbank Precincts.

Community Buildings
Upgrade prioritised buildings within the Adelaide Park Lands to offer purpose-designed, safe and accessible facilities, whilst also providing multi-function spaces for flexible community use.

Adelaide Aquatic Centre Integration
A new Adelaide Aquatic Centre will be built immediately south of the existing facility at Denise Norton Park/Pardipardinyilla (Park 2) in the northern Adelaide Park Lands as an all electric, sustainable and contemporary aquatic facility. The integration and connectivity of the new facility with the wider Adelaide Park Lands will be a key priority and deliverable of master planning for the Northern Park Lands.

Light Square/Wauwi Master Plan
Deliver a master plan for Light Square/Wauwi that explores connection and Care for Country, improved tree canopy, succession planting, heritage values, transport, walking and cycling connectivity, events, adjacent uplift and future uplift potential, climate change mitigation, artwork and cultural celebrations, smart technology and increased residential population and changing demographics.



Northern Park Lands Master Planning
Undertake master planning for the Northern Park Lands (Parks 2, 3, 4, 5, 6) that provides for consideration of Kaurna culture, improved connections to surrounding suburbs and delivers a high quality natural asset for the community.

Bonython Park/Tulya Wardli (Park 27) Master Plan
Deliver a master plan for Bonython Park/Tulya Wardli (Park 27) that provides improvements to the broader Precinct including Kaurna culture, greening, playspaces, connectivity and integration with the New Women's and Children's Hospital.

Master Plans for the Squares
Prepare master plans for Hurtle Square/Tangkaira, Hindmarsh Square/Mukata and Wellington Square/ Kudnartu to respond to growth in the city and changing community needs.

Whitmore Square/Iparrityi Stage 2 Implementation
Deliver the Whitmore Square/Iparrityi Master Plan through asset renewal and succession planting, to build upon improvements already delivered through lighting and path upgrades.

Victoria Park/Pakapakanthi (Park 16) Implementation
Commence the staged implementation of recommendations within the Victoria Park/ Pakapakanthi (Park 16) Master Plan in collaboration with the local community, stakeholders and land managers to improve accessibility and amenity throughout Victoria Park/Pakapakanthi (Park 16).

Reimagining Rymill Park/Murlawirrapurka (Park 14)
Continue improvements aligned to the Rymill Park/ Murlawirrapurka (Park 14) Master Plan including new landscaping and tree planting and creation of promenades. Enhance the kiosk to improve the quality of experience for users.







Goal 2
Connections and Networks

Goal 2 — Connections and Networks

Strategies

The Adelaide Park Lands are a network of connected parks

Strategy 2.1
Improve the Adelaide Park Lands Trail linking all parks and providing a pleasant and convenient cycling and walking route.

The Adelaide Park Lands connect the city to the inner suburbs

Strategy 2.2
Connect the Adelaide Park Lands with the hills, coast and Greater Adelaide open space network.

Strategy 2.3
Improve public and active transport connections with Adelaide Park Lands and work with neighbouring councils to reduce access barriers.

Strategy 2.4
Improve safety, universal design and connectivity within and to the Adelaide Park Lands.

The Adelaide Park Lands are easily identifiable

Strategy 2.5
Develop an identifiable landscape character for Adelaide Park Lands edges (urban address).

Strategy 2.6
Create a strong, cohesive overall Adelaide Park Lands identity.

The Adelaide Park Lands invite exploration and are safe and easy to access and move around in, day and night

Strategy 2.7
Install wayfinding signage enhancing the legibility of paths and connections across the Adelaide Park Lands.

Strategy 2.8
Develop a network of bicycle parking and bicycle facilities across the Adelaide Park Lands.

Strategy 2.9
Establish shared walking and cycling paths throughout the Parks that include safe connections and crossing points and designed to accommodate different travel modes.

Strategy 2.10
Create a path network within each park that complements the landscape character and desired use of the park.

Strategy 2.11
Where appropriate return car parking on the Adelaide Park Lands to a Park Lands Purpose and consider temporary uses of existing car parking to provide greater community benefit.

Strategy 2.12
Incorporate smart technology in priority locations across the Adelaide Park Lands including technologies such as pedestrian counters and charging facilities.

Strategy 2.13
Strengthen the urban address of the Adelaide Park Lands through large tree species and native plantings.

Strategy 2.14
Promote the Adelaide Park Lands Trail and enhance to provide greater connections, safer crossings, greening and improved wayfinding with an aim to develop a continuous/unbroken trail linking the Adelaide Park Lands.

Strategy 2.15
Provide lighting to support safe movement throughout the Adelaide Park Lands balanced with preservation of environmental values and biodiversity.

Movement Types

The spatial planning approach for movement explains the variety of ways in which safe and legible connections into and through the Adelaide Park Lands

are provided, allowing users to access the diversity of activities and attractions that are on offer.

Promenades

Promenades provide key pedestrian and cycle connections into significant activity centres within the Adelaide Park Lands, linking to both the surrounding suburbs and the city, tying in with major metropolitan pedestrian routes and bikeways and cross-city links. Promenades provide important connections through the Adelaide Park Lands connecting the city to Greater Adelaide and beyond.

Promenades are typically tree-lined with ornamental planting, lighting, seating, wayfinding and interpretive signage.

Urban Address

The urban address provides a structured, designed perimeter to the Adelaide Park Lands with a level of amenity to attract and welcome people. It is a transitional space designed to encourage and entice exploration deeper into the Adelaide Park Lands. More legible entries and open views (where appropriate) visually and physically connect people to the opportunities within. It provides comfort and amenity for use as a place in its own right.

The urban address plays an important wayfinding role, paying particular attention to major pedestrian and cycle links connecting the city to Greater Adelaide.

It responds to anticipated growth to inner-rim suburbs surrounding the Adelaide Park Lands and to outer edges of the city. The urban address reverses the focus from the city providing an interface that looks outward to the inner suburbs.

Adelaide Park Lands Trail

The Adelaide Park Lands Trail provides an iconic recreational circuit linking Adelaide Park Lands Precincts and offering varying levels of amenity. In some locations, the Trail provides connectivity to the Greater Adelaide strategic walking and cycling network.

Typically it includes a 3 metre to 3.5 metre sealed surface, tree-lined edges and a consistent character at path intersections, road crossings and rest points. Lighting is strategically provided to key sections of the Trail based on levels of night-time use.

Where the Adelaide Park Lands Trail location coincides with another movement type, the Trail will take precedence, except where the other movement type is of a higher quality or amenity, for example a promenade.

Edge Paths

Edge paths provide routes along the Adelaide Park Lands where they interface with roads, providing pedestrian and cycle links associated with the road network.

Edge paths provide connections along the Adelaide Park Lands perimeter creating a variety of informal recreational circuits and providing transition between built form, transport infrastructure and park.

The design of edge paths will prioritise the use of permeable surfaces that respond to climate change impacts and reduce urban heat storage rather than black asphalt.

Walking and Running Trails

Walking and running trails within the Adelaide Park Lands are developed to provide a variety of experiences across a range of park types.

Typically these trails provide connections within a park or informal planting area and connect more broadly via other path networks.

Walking trails and running tracks include wayfinding and interpretive signage that may range from information regarding biodiversity in the Adelaide Park Lands, to distance markers for runners and walkers.

The design of walking and running trails will prioritise the use of permeable surfaces that respond to climate change impacts.

Shared Paths

Shared paths provide the balance of connections in the Adelaide Park Lands. They provide a base level of connection for walking and cycling, offering varying levels of amenity depending on location.

Typically they include a sealed surface with a consistent width to enable shared use. Shared paths often connect to active transport routes linking active cross-city links through to greater Adelaide and beyond. These may be lit depending on location and frequency of night-time use.

Access Roads

Access roads allow for vehicular access into some sections of the Adelaide Park Lands.

The creation of new access roads will be minimised and only provided where no alternative exists and provide safety and accessibility outcomes (eg emergency service access).

Where appropriate access roads will be narrowed to a consistent width to reduce impervious surfaces and the impact on the natural landscape.

Access roads will minimise their impact on the landscape, incorporating trees and other plantings, as well as Water Sensitive Urban Design techniques.

Car Parking

The Strategy supports an overall reduction in existing car parking in the Adelaide Park Lands.

Existing car parking is accommodated in some locations in the Adelaide Park Lands. Where appropriate, existing car parking will encourage multiple uses such as market stall, events, community sport and recreation opportunities and electric vehicle charging to maximise public access to existing infrastructure.

Car parking will minimise its impact on the landscape, provide for additional greening and trees and incorporate Water Sensitive Urban Design.

Fencing

Fencing in the Adelaide Park Lands will provide for safety, temporary event purposes or where it is a requirement of a sporting code.

If fencing is provided for sporting purposes the priority will be to maintain public access to these spaces outside of programmed usage. Fencing should not be provided for security purposes.

Heritage fencing may be maintained to preserve heritage connections.

Low scale, open fencing is the preferred option that retains visual amenity, visual permeability and public accessibility.

Smart Technology

The incorporation of smart technology will be considered to assist in the planning and management of the Adelaide Park Lands, including sensors to capture visitor numbers, path usage, dwell time and micro-climate data.

Priorities

The following priorities will enhance and protect the Adelaide Park Lands.

Greenhill Road Corridor
Provide improvements to the Greenhill Road Corridor including an expanded east-west walking and cycling connection, wayfinding and storytelling, safer road crossings, shade and amenities

Great Connections
Improve pedestrian and cycling networks with regular and safe crossing points, amenity along the route and path lighting.

The Urban Address
Provide an increased level of amenity and attraction along Adelaide Park Lands frontages to both the city and inner-rim suburbs with a focus on park entries to encourage and entice further exploration deeper into the parks.

Amazing Art
Consider permanent and temporary displays of art including art trails and interactive artworks across the Adelaide Park Lands.

Lights, Lights, Lights
Provide wildlife appropriate lighting along key paths, at hubs, sporting ovals and the urban address to support increased night-time use and improve safety.

Shade Avenues
Protect and enhance heritage planting avenues and review opportunities for new avenue planting to provide shade for users.

Wayfinding and Interpretation
Continue to install wayfinding and interpretive signage across all parks as necessary, particularly when associated with other park upgrades, including opportunities for the expression of Kaurna culture.

Adelaide Park Lands Trail Improvements
Enhance the Adelaide Park Lands Trail through greater connections, safer crossings, greening and improved wayfinding. Aim to deliver a continuous/unbroken trail linking the Adelaide Park Lands and an iconic trail experience.

Indicator	Target	Baseline
Clear path hierarchy across Adelaide Park Lands	Provide clear path hierachy for all new projects from 2024.	Adopt an Adelaide Park Lands path and trail asset hierarchy.
Safe road and path crossing points	Undertake safety upgrades to all road crossings by 2036.	Prioritise crossings with the highest traffic volumes over 20,000 vehicles per day.
Active transport users	Increase number of active transport users by improving Adelaide Park Lands pathways, lighting and signage.	1,342 movements (2022 Super Tuesday counts)
Car parking	Reduce existing car parking on land managed by the City of Adelaide by 5%.	2,346 car parking spaces (2022 Audit)
Connectivity with surrounding bicycle networks	Ensure connections are maintained and where possible improved with all surrounding bicycle networks with a preference for off-road connections.	River Torrens Linear Path Marino Rocks Greenway/ Mike Turtur Bikeway Rugby/Porter Bikeway Outer Harbor Greenway

Figure 7 Connections and Networks – Targets





Goal 3
Natural Systems, Cultural Landscapes and Climate Resilience

Goal 3 — Natural Systems, Cultural Landscapes and Climate Resilience

Strategies

The Adelaide Park Lands are a place of natural beauty and Kaurna cultural significance

Strategy 3.1
Recognise, promote and protect sites of Kaurna cultural heritage and significance and work with Kaurna Miyurna to provide education to the community about these sites.

Strategy 3.2
Work with Kaurna Miyurna to return Caring for Country practices to the Adelaide Park Lands, such as promoting and facilitating Cultural Burns as effective land management in grassland and woodland settings.

Strategy 3.3
Provide a positive visitor experience of sites of cultural significance.

Strategy 3.4
Establish a range of natural, ornamental and cultural landscapes celebrating the diversity of the Adelaide Park Lands.

Strategy 3.5
Seek to incorporate regenerative practices into the planning, design, and management of the Adelaide Park Lands to improve social and environmental wellbeing.

The Adelaide Park Lands celebrate biodiversity

Strategy 3.6
Through Biodiversity Sensitive Urban Design enhance biodiversity in the Adelaide Park Lands and provide food, resources and habitat.

Strategy 3.7
Continue to protect and enhance habitats and ecosystem health to achieve a net increase in biodiversity.

Strategy 3.8
Seek opportunities to improve the quality and condition of sites with remnant vegetation.

Strategy 3.9
Participate and lead in global urban biodiversity initiatives and research.

Strategy 3.10
Continue to survey, monitor and improve our knowledge of Adelaide Park Lands biodiversity. Share data and report findings.

The Adelaide Park Lands are water sensitive, with healthy watercourses

Strategy 3.11
Enhance the ecological health of Adelaide Park Lands watercourses including slowing the flow, improving water quality and greater diversity of aquatic and terrestrial flora and fauna.

Strategy 3.12
Ensure sustainable water use across the Adelaide Park Lands.

Strategy 3.13
Enhance and promote the role of of submerged native aquatic vegetation in river, lake and wetland settings.

The Adelaide Park Lands are climate resilient

Strategy 3.14
Strengthen the Adelaide Park Lands' role in developing a climate resilient city and in reducing the urban heat island effect.

Strategy 3.15
Design and manage the Adelaide Park Lands to recognise the increasingly important value of open space in response to a growing population.

Strategy 3.16
Retain and strengthen distinctive mature tree species through succession planting.

Strategy 3.17
Seek opportunities to increase greening and tree canopy, including through community participation.

Strategy 3.18
Understand the risks for tree species and biodiversity from pests, diseases and climate change and develop adaptation responses.

Strategy 3.19
Ensure climate change risks and opportunities are assessed and integrated in decision making and management of the Adelaide Park Lands.

The Adelaide Park Lands are valued as a National Heritage site worthy of World Heritage Listing

Strategy 3.20
Ensure the values of the National Heritage Listing are protected and promoted.

Strategy 3.21
Progress World Heritage Listing of the Adelaide Park Lands and City Layout.

Strategy 3.22
Demonstrate best practice in managing heritage assets.

Strategy 3.23
Retain existing spatial layouts and pathway alignments which are part of the National Heritage Values of the Adelaide Park Lands.

Strategy 3.24
Maintain and enhance views and vistas to the skyline and Adelaide Hills through carefully planned tree planting and spatial arrangements to reinforce the open and expansive character of the Adelaide Park Lands.

The Adelaide Park Lands are a place of shared appreciation and knowledge

Strategy 3.25
Share knowledge, provide education and promote Adelaide Park Lands values to ensure the Adelaide Park Lands are appreciated and recognised as a unique asset for South Australia.

Biodiversity

The natural heritage and biodiversity within the Adelaide Park Lands is one of its most valuable components. Adelaide is fortunate to have pockets of vegetation that have lineage back to pre-European times when Kaurna Miyurna were primary custodians of Kaurna Yarta.

These vegetation pockets, along with soil indicators, provide important clues to how we can manage the land and encourage and support more native species and biodiversity to return to the city.

Planting of diverse native species will be according to the five pre-European planting associations occurring in the Adelaide Park Lands to enhance and expand Key Biodiversity Areas.

The Adelaide Botanic Garden contributes to South Australia's biodiversity and conservation efforts. The State Herbarium, located within the grounds of the Adelaide Botanic Garden, undertakes research and gathers information for the various collections within the Herbarium. This includes research under the themes of: biodiversity discovery, species populations, climate change, and history and collections. Also located within the Adelaide Botanic Garden is the South Australian Seed Conservation Centre that helps to protect the state's threatened plant species from extinction and supports the restoration of habitats across the state.

Key Biodiversity Areas

A Key Biodiversity Area is a management boundary that prioritises high value native biodiversity. At least one Key Biodiversity Area is in each of the five recognised pre-European vegetation communities across the Adelaide Park Lands.



Key Biodiversity Areas contain medium and high-quality biodiversity with remnant vegetation or native revegetation. This improves ecological connectivity and facilitates movement of animals and plant material (eg seed) across and between Key Biodiversity Areas. Creating space for plants and wildlife to move makes the Adelaide Park Lands more resilient to threats presented by climate change, disease and pests.

Plant species that have adapted to the local conditions of soil, temperature and rainfall are most likely to survive with little additional intervention. These landscapes and species have also been shaped by Kaurna cultural practices for millennia, including the skillful use of fire. Kaurna fire management or Culture Burning, benefits the biodiversity within Key Biodiversity Areas. These plants also attract and support native fauna species that assist with pollination, relying on them for food and shelter.

Key Biodiversity Areas are not irrigated, relying on rainfall and watercourses. They embrace the open woodland and grassland aesthetic of the original Adelaide Plains. They enhance and protect areas of significant biodiversity and remnant vegetation while providing a recreation opportunity to escape from the city and suburbs into a natural landscape experience for walking and discovery, picnicking and playing, roaming and relaxing.

Woodlands / Grasslands

Woodlands and grasslands are characterised by a highly diverse ground-layer of vegetation. Woodlands have large shrubs and a 20-50% canopy coverage of medium to large trees while grasslands will have an almost complete lack of trees.

The Woodland/Grassland landscape offers a high diversity of habitats and resources, and therefore high native biodiversity. Engagement opportunities are presented through interpretation and events/activities to gain a deeper understanding of Adelaide's pre-European vegetation and ecosystems.

Tree Canopy and Greening

The City of Adelaide defines tree canopy in the Adelaide Park Lands as green infrastructure (trees and shrubs) identified with a height of 1 metre and above.

The Adelaide Park Lands has varied levels of tree canopy cover. The aim is to provide an overall increase in canopy cover and understorey that is balanced with the open space and recreational requirements of the community. This will include succession planting in existing areas as well as new climate resilient canopy trees. Natural shade will be provided adjacent playing fields for spectator comfort and along trails and paths to improve shading, cooling and amenity.

Climate Resilience

Projected changes to seasonal conditions and frequency of extreme weather events will impact the Adelaide Park Lands. The quality of open spaces and capacity of natural systems will evolve as the climate changes.

The Adelaide Park Lands themselves mitigate the urban heat island as they surround the City of Adelaide with irrigated gardens, lawns and vegetation which provide a cooling effect. They also play a role in flood mitigation, with features such as the Torrens Lake and Pakapakanthi Wetland.

Riparian

Riparian landscapes exist in the Adelaide Park Lands as remnants of original watercourses as well as the purposeful construction of new features such as wetlands, basins and swales to manage stormwater.

Brown Hill Keswick Creek Catchment

The southern area of Adelaide is within the Brown Hill Keswick Creek water catchment, where Gleeson Creek and other waterways west of Mount Osmond enter the City of Adelaide via Victoria Park/Pakapakanthi (Park 16) and flow westward along Park Lands Creek across to Blue Gum Park/Kurangga (Park 20). Now part of the urban drainage network, these flow paths connect with the City of Unley and ultimately contribute stormwater runoff to Keswick Creek. In the western Park Lands, the city also contributes stormwater runoff to Keswick Creek, via GS Kingston Park/Wirrarninthi (Parks 23), Ellis Park/Tampawardli (Park 24) and Gladys Elphick Park/Narnungga (Park 25).

River Torrens/Karrawirri Pari Catchment

The River Torrens/Karrawirra Pari catchment extends from the upper reaches of the Torrens Valley from the north, east and also via smaller creeks on the south eastern side of the city, ultimately draining through the centre of Adelaide, filling the Torrens Lake and discharging downstream beyond Bonython Park/Tulya Wardli (Park 27) to the coast via the City of West Torrens. Several tributaries discharge into the river, notably Botanic Creek which captures rainfall from suburbs in the City of Burnside and First Creek, a major urban waterline connected to Waterfall Gully.

The catchment is managed across multiple local government boundaries and is collectively used as a stormwater conveyance system with a majority of Adelaide's urban stormwater discharging via the Torrens Lake. In periods of high rainfall, substantial volumes of silt and debris is transported into waterways and is deposited into the lower reaches, where it accumulates just beyond the Torrens weir, creating a dynamic and ever changing environment.

Stormwater

Throughout the Adelaide Park Lands, stormwater from urban roads and properties is discharged into drainage channels connected to riparian landscapes and directly enters primary water systems such as:

- River Torrens/Karrawirri Pari
- Park Lands Creek
- Botanic Creek

- Wirrarninthi Wetlands
- Pakapakanthi Wetlands
- First Creek Managed Aquifer Recovery and Storage System
- Main Lake/Kainka Wirra.

These drainage networks offer opportunity to re-establish riparian features and use water sensitive urban design approaches to minimise stormwater contaminants from polluting waterways and improve water quality.

Water Features

Constructed water features are located throughout the Adelaide Park Lands for amenity purposes and stormwater detention. Key water features include:

- Light Square/Wauwi water feature
- Rymill Lake and fountain
- Bonython Park/Tulya Wardli (Park 27) Boat Pond
- Veale Gardens creek
- Himeji Gardens
- Victoria Square/Tarntanyangga Three Rivers Fountain
- Hindmarsh Square/Mukata fountain.

Water Use

Water used to irrigate the Adelaide Park Lands includes a mix of recycled wastewater, groundwater, potable mains, and surface water from the River Torrens/ Karrawirra Pari.

The City of Adelaide is a major customer of the Glenelg to Adelaide Park Lands recycled water network using 85% of non-potable water for irrigation. Expanding the use of sustainable water resources to support Adelaide Park Lands amenity and recreation.

Heritage

Heritage includes natural assets and built form together with cultural associations and practices. Enhancing heritage provides the opportunity to increase awareness and protection of the Adelaide Park Lands to ensure values are retained into the future.

The cultural significance of a place is defined as the aesthetic, historic, scientific, social, or spiritual value for past, present, or future generations. It is embodied in the place itself, in its fabric, its setting, its contents, in the associated documents, in its use, and in people's memories and association with the place

UNESCO World Heritage

The City of Adelaide is leading a bid for World Heritage Status for Adelaide and its rural settlement landscapes, including the Adelaide Park Lands.

The nomination will be finalised jointly by the state government and Australian Government and submitted to the World Heritage Centre.

National Heritage

The Adelaide Park Lands and City Layout was included on the National Heritage List on 7 November 2008.

The following National Heritage conservation principles apply to the Adelaide Park Lands:

- The National Heritage values are the basis for the future conservation and management of the Adelaide Park Lands and City Layout.
- Conserve the Adelaide Park Lands and City Layout in accordance with the principles and practices of the Australia ICOMOS Charter of Places of Cultural Significance (the Burra Charter) and its future revisions.
- Retain, conserve, and restore the identified heritage attributes of the Adelaide Park Lands and City Layout, including their form, spatial arrangements and fabric.

- Retain the Adelaide Park Lands and City Squares as public land for the use and enjoyment of all South Australians.
- Ensure the Park Lands and City Squares retain their cultural heritage significance when considering the ongoing use, change, development and maintenance of the place.
- Fulfil the objectives and statutory principles of the *Adelaide Park Lands Act 2005*.
- Observe and comply with the legislative requirements arising from the *EPBC Act 1999*, *Heritage Places Act 1993* and *Planning, Development and Infrastructure Act 2016.*
- Promote the National Heritage Values of the Adelaide Park Lands and City Layout through education and interpretation programs to enhance appreciation of their significance to all Australians.
- Record changes to the Adelaide Park Lands and City Layout which affect their National Heritage value.
- Regularly monitor the condition and integrity of the National Heritage Values.

The Adelaide Park Lands and City Layout National Heritage Management Plan will be used by the City of Adelaide, Government of South Australia and Federal Government agencies to guide decision making in the Adelaide Park Lands.

National Heritage Values are Park Lands wide considerations. Advice will be sought from the Australian Government for actions with the potential to impact on National Heritage Values.

State Heritage

The South Australian Heritage Council has recommended the Adelaide Park Lands, Squares and City Layout be recommended to the Minister for Planning for State Heritage Area consideration.State and Local Heritage Places are found throughout the Adelaide Park Lands.

Kaurna Cultural Heritage

The Adelaide Park Lands are located on Kaurna Yarta (Country). The land that forms the Adelaide Park Lands and the River Torrens/Karrawirra Pari have significant cultural and spiritual value for Kaurna Miyurna. Information regarding Kaurna heritage is included in the Precinct Plans section of this Strategy.

Priorities

The following priorities will enhance and protect the Adelaide Park Lands:

KYAC Country Plan
The KYAC Country Plan will encompass the whole of the Kaurna Peoples Native Determination Area. Once developed it will help inform approaches to Caring for Country.

Restore Riparian Corridors
Realign and naturalise creek networks to improve water quality, biodiversity movement and fauna habitat. Incorporate opportunities for informal recreation and nature play, boardwalks and walking trails, and wayfinding and interpretive signage.

Strategic Water Resources
Improve the sustainable sourcing and use of water throughout the Adelaide Park Lands for sport, recreation, planting, amenity and cooling.

Greening and Canopy Cover
Increase tree canopy cover and understorey vegetation and reduce hard surfaces in the Adelaide Park Lands, prioritising areas that are the most vulnerable to heat and where tree canopy is at risk from climate change.

UNESCO World Heritage Bid
Recognised as one of the most complete examples of nineteenth-century colonial planning, achieving UNESCO World Heritage status for the Adelaide Park Lands and City Layout would bring international recognition and attention to our region, be a source of local, state and national pride, and boost optimism and investment.

State Heritage Listing
Progress the South Australian Heritage Council's recommendation for State Heritage nomination of the Adelaide Park Lands.

Biodiversity Monitoring Program
Establish and implement a biodiversity monitoring program and investigate methods to accurately plan and report on biodiversity.

Indicator	Target	Baseline
Kaurna Knowledge and Capacity Building	Aboriginal people employed to work in the Adelaide Park Lands.	Aboriginal rangers engaged
Water Quality	Across the three receiving water bodies in the City of Adelaide: 80% reduction in suspended solids 90% reduction in gross pollutants 60% reduction in phosphorus 45% reduction in nitrogen.	 1,122,282 kg/yr 307,939 kg/yr 2,391 kg/yr 13,068 kg/yr
River Health	Reduce Torrens Lake carp density to 50 kg/ha by 2026 and maintain the density below this threshold to 2030.	65 kg/ha

Figure 8 Natural Systems, Cultural Landscapes and Climate Resilience – Targets

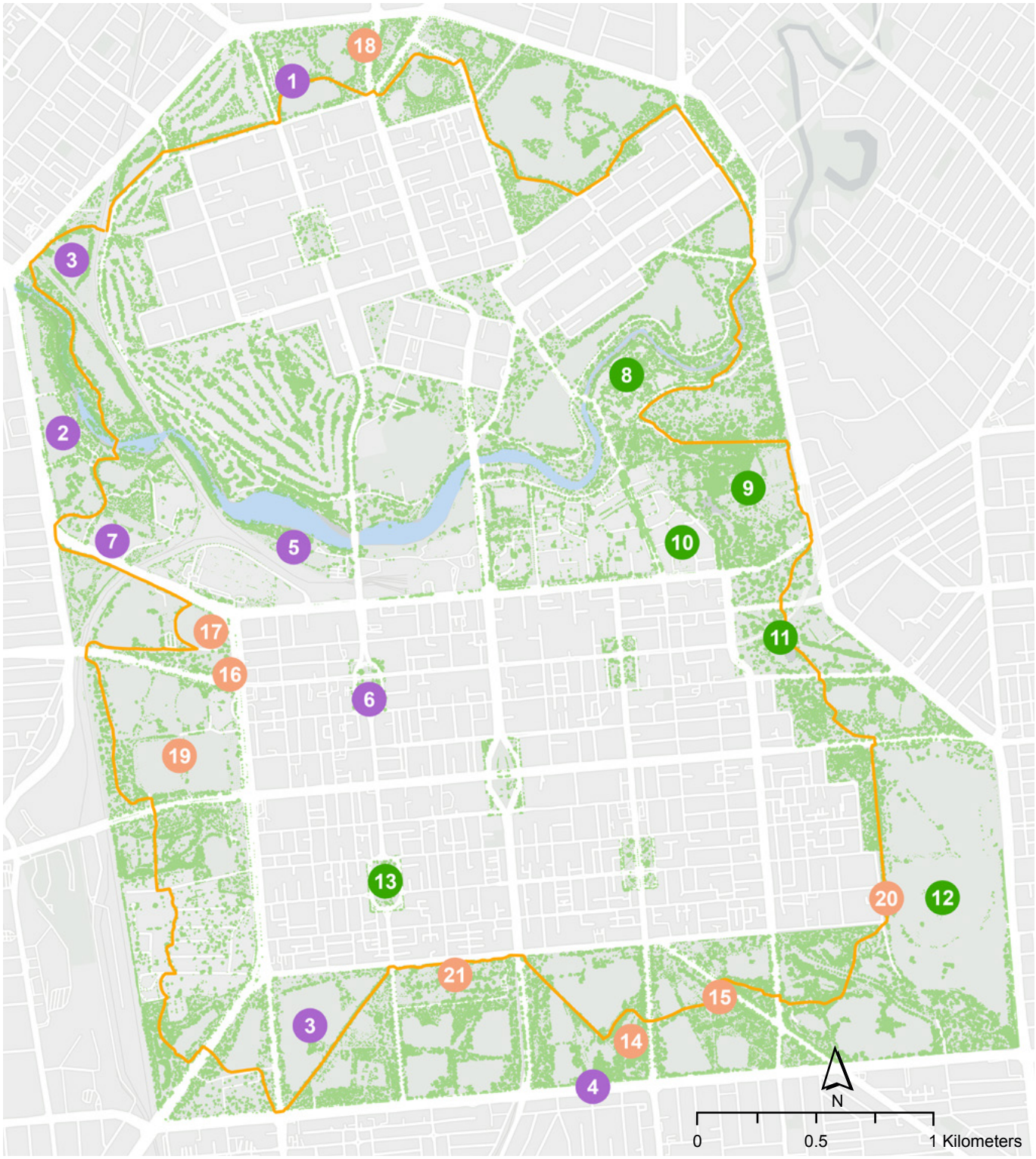


The following Strategic Priorities have been identified through the development of this Strategy. The priorities have been identified through community and stakeholder consultation and through the Government of South Australia and City of Adelaide priorities.

Also highlighted are Strategic Priorities which are currently In Progress or have been Achieved that were identified through the Adelaide Park Lands Management Strategy (2015–2025) or through state government priorities. Projects without numbers are not location specific, they are Adelaide Park Lands wide priorities.



Strategic Priorities

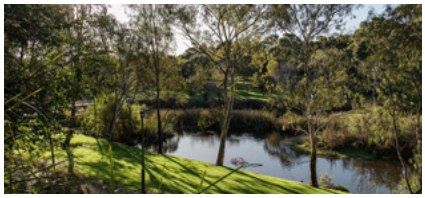


Achieved
New Moves
In Progress
Tree Canopy 2022
River Torrens / Karrawirra Pari
Adelaide Park Lands Trail

New moves



1 **Adelaide Aquatic Centre Integration**



2 **Bonython Park/ Tulya Wardli (Park 27) Master Plan**



3 **Community Buildings**



4 **Greenhill Road Corridor**



5 **Helen Mayo Park/Tulya Wardli (Park 27C)**



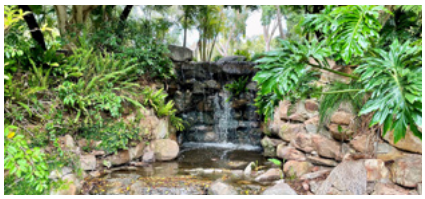
KYAC Country Plan



6 **Light Square/ Wauwi Master Plan**



7 **New Women's and Children's Hospital Integration**



Strategic Water Resources



Biodiversity monitoring program



State Heritage Listing



Adelaide Park Lands Trail Improvements

In progress



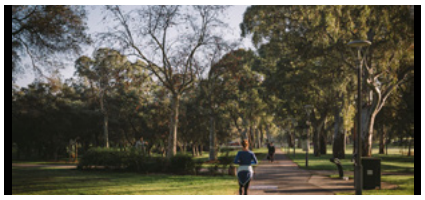
8 **Adelaide Zoo Master Plan Implementation**



9 **Adelaide Botanic Garden Master Plan Implementation**



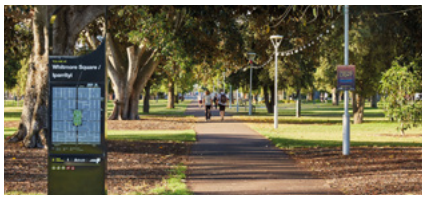
Amazing Art



Great Connections



Greening and Canopy Cover



Lights Lights Lights



10 **Lot Fourteen Implementation**



Master Plans for the Squares



11 **Reimagining Rymill Park/ Murlawirrapurka (Park 14)**



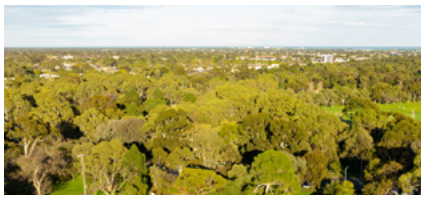
Restore Riparian Corridors



Shade Avenues



The Urban Address



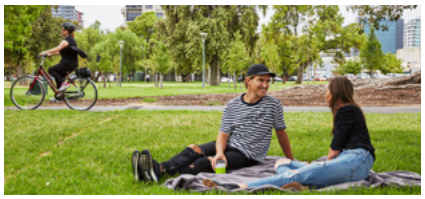
UNESCO World Heritage Bid



12 **Victoria Park/Pakapakanthi (Park 16) Implementation**



Wayfinding and Interpretation



13 **Whitmore Square/Iparrityi Stage 2**

Achieved



14 BMX and Youth Activity Hub

An expanded BMX track including multiple skill level training tracks creates a significant destination in Blue Gum Park/Kurangga (Park 20). Associated attractions include nature and adventure play complemented by the adjacent Tree Climb course and kiosk.



15 Central Park in the South

Nestled under the protective boughs of an expansive Moreton Bay fig, the much loved Pelzer Park/Pityarilla (Park 19) playspace has undergone a major refurbishment. Interactive water play elements allow children to weave a flow of water through rock and sand paths. Traditional play equipment sits alongside cubby house structures inspired by Aboriginal Wurlies.

The creek bed weaves through the centre of the hub and is home to thousands of new plants.



16 City Skate Plaza

Located next to West Terrace and nestled in the Adelaide Park Lands, City Skate is a facility built for skating, BMX and other wheeled sports from beginner to advanced skill levels.

City Skate is the largest skate park in South Australia and attracts local, national and international events.



17 Newmarket Urban Park

Gladys Elphick Park/Narnungga (Park 25) provides a wide range of user experiences serviced by high quality infrastructure including the sports hub and new skate facility.

The park has been transformed with high quality irrigated lawn areas together with natural settings providing a range of passive and recreational pursuits. The urban address has been enhanced attracting people and providing a transition between the Adelaide Park Lands and the north-west sector of the city.



18 Northern Activity Hub

The Northern Activity Hub includes upgraded tennis courts, new fencing, basketball rings and tennis nets.

A community hub provides a small plaza, seating, BBQs, and outdoor exercise facility.

Newly planted trees, entry statement plantings and landscape treatments create a shaded setting with improved shared paths and pedestrian lighting increasing accessibility for the community.



19 People's Park of the West

Ellis Park/Tampawardli (Park 24) continues to be used for a wide range of sporting and cultural uses. With a large amount of open space the plateau continues to provide an ideal location for large events and concerts.

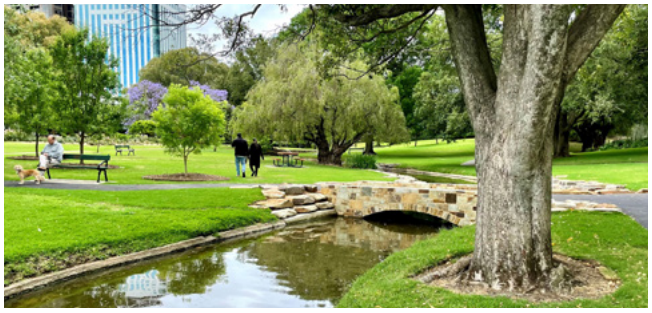
Improvements to user experience included consolidation of buildings, upgrades to vehicular and pedestrian access and safety to the Adelaide High School and new community sports building.



20 Victoria Park/Pakapakanthi (Park 16) Master Plan

The Victoria Park/Pakapakanthi (Park 16) Master Plan sets a vision for Victoria Park to:

- Be greener, cooler and more climate resilient
- Celebrate cultural and social values
- Provide space for community use and connection to
- Be biodiverse and improve Adelaide's open grassy woodland landscape character
- Provide quality community sports and recreation
- Attract and support diverse events and activities.



21 Vibrant Veale

Veale Gardens, located within Veale Park/Walyu Yarta (Park 21), continues to be a popular place for wedding ceremonies as well as informal recreation.

Accessibility has been improved with replacement footbridges, and improvements to the creek were made to prevent water overflow and soil erosion, ensuring users can continue to enjoy the gardens.



Part C

Implementation
Partnerships
Investment

Adelaide Park Lands Precinct Plans

Individual parks within the Adelaide Park Lands have been grouped into Precincts which are unique to the Adelaide Park Lands Management Strategy and allow for planning considerations to be provided at the Precinct level.

The boundaries of the 11 Precincts, Squares and Gardens were determined using the following factors:

- Existing and proposed landscape character
- Communities of interest in the city and inner suburbs
- Adjacent council boundaries
- Major infrastructure and transport corridors
- Management arrangements including third party responsibilities.

All Precincts are informed with reference to existing state and local government strategies and plans.

Each Precinct Plan provides a high level overview of site context, Heritage Places and natural systems and identifies future drivers for change.

Master planning will generally be the next stage of planning for the Precincts. The Precinct Considerations identified in the Precinct Plans will assist in site analysis and identifying future opportunities. Once a master plan is approved by the relevant landowner for a Park or Precinct, this information will take precedence.

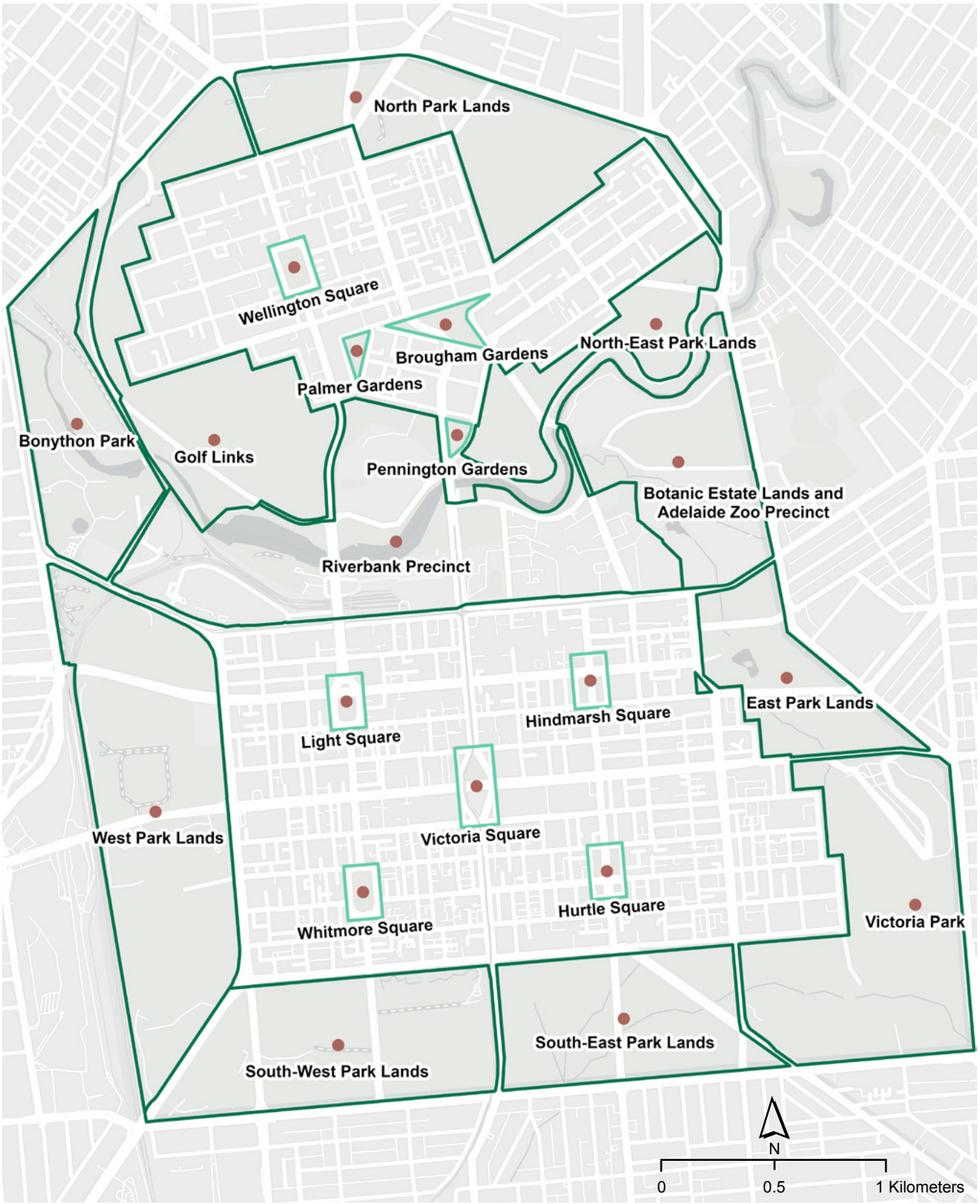
Descriptions of Kaurna and Historic Heritage draws on the work of:

- National Heritage Management Plan for the Adelaide Park Lands and City Layout
- Community Land Management Plan for the Adelaide Park Lands
- Adelaide Park Lands and Squares Aboriginal Heritage (Australian Cultural Heritage Management, 2005)
- Adelaide Park Lands and Squares Cultural Landscape Assessment Study (David Jones 2007) which highlights the works of landscape designers and gardeners John Ednie Brown, August Pelzer and William Pengilly.

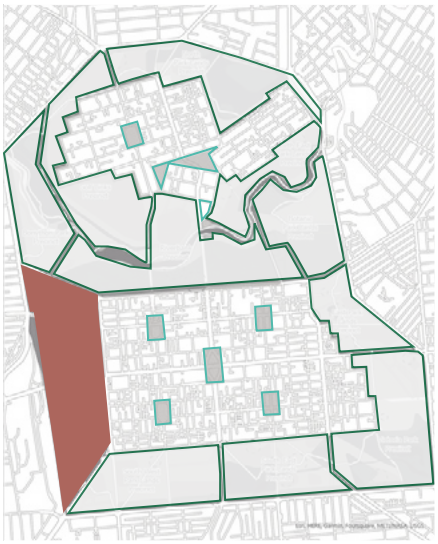
The Precincts are:

- West Park Lands Precinct
- South-West Park Lands Precinct
- South-East Park Lands Precinct
- Victoria Park Precinct
- East Park Lands Precinct
- North Park Lands Precinct
- Golf Links Precinct
- Bonython Park Lands Precinct
- River Bank Precinct
- Botanic Estate Lands and Adelaide Zoo Precinct
- North-East Park Lands Precinct
- Squares and Gardens

Adelaide Park Lands Precincts, Squares and Gardens



West Park Lands Precinct



Precinct Snapshot

Parks included in Precinct

- G S Kingston Park/Wirrarninthi (Park 23)
- Ellis Park/Tampawardli (Park 24)
- Gladys Elphick Park/Narnungga (Park 25)

Size of Precinct

121 hectares or 13% of the total area of the Adelaide Park Lands

Tree Count and Canopy

22.5% canopy cover provided by 6,846 trees

Key Precinct Uses

- West Terrace Playground
- City Skate
- Narnungga Urban Forest
- Karen Rolton Oval
- Wirrarninthi Wetland and Education Trail
- West Terrace Cemetery
- Adelaide High School

Context

The West Park Lands Precinct is bordered by rail lines to the west, West Terrace to the east and several arterial roads dissecting the Precinct. Despite containing a diverse range of places and landscapes, including two State Heritage Places (Adelaide High School and West Terrace Cemetery), four city gateways, a large dedicated events space, over 18 hectares of playing fields, three important biodiversity sites and around 48 hectares of open woodland, the West Park Lands Precinct has one of the lowest levels of visitation of all the Adelaide Park Lands Precincts.

Kaurna

There are general references to regular use of this area as a camping venue by Aboriginal peoples pre-contact and post-contact and there is also a record of a stone flake artefact found on these grounds. In 1844 Ellis Park/Tampawardli (Park 24) was the site of a planned fight between Kaurna people and Ngarrindjeri people which was prevented by police.

Aboriginal people are buried in West Terrace Cemetery and the playground in G S Kingston Park/Wirrarninthi (Park 23) was frequented by Aboriginal children living in the West End of Adelaide during the 1930s to 1950s.

Historic Heritage

G S Kingston Park/Wirrarninthi (Park 23) retains its general shape and form as planned by Colonel William Light, and has substantial early tree planting including perimeter plantations. The park is dominated by the highly significant West Terrace Cemetery, a State Heritage Place which contains remnant exotic and indigenous vegetation as well as built features.

Ellis Park/Tampawardli (Park 24) and Gladys Elphick Park/Narnungga (Park 25) retain their original shape and form as devised by Colonel William Light. They reflect the philosophies, spatial and planting design intent, including species plantings and pathway alignments, of early landscape designers, Brown and Pelzer.

Ellis Park/Tampawardli (Park 24) and Gladys Elphick Park/Narnungga (Park 25) were originally used for soil and stone extraction, agistment, temporary

encampment and council works before being used for recreational purposes and more organised sporting grounds in the 1920s and beyond. A tree planting program intermittently occurred.

Landscape

A number of specimen trees are scattered throughout the Precinct. The designed Kingston Gardens with its bandstand and remnant exotic tree plantings, is a significant cultural heritage feature in G S Kingston Park/Wirrarninthi (Park 23). The West Terrace Playground was designed by Pelzer in 1915.

Current access into the parks and movement through, particularly north-south, is limited.

Karen Rolton Oval and the City Skate Park provide key activity hubs. Amenity and activity are spread throughout the Precinct with a diversity of offerings.

Drivers for Change

Situated between a growing city and rapidly growing resident and worker populations in West Torrens, the opportunity to create attractive places and spaces that draw people to and activate the West Park Lands has never been greater. The development of the new Royal Adelaide Hospital and biomedical precinct, revitalisation of the western end of Hindley Street and the University of South Australia's City West campus will see a substantial increase in the number of people accessing the north-west corner of the city. The resident population in the combined west, north-west and south-west areas of the Central Business District is forecast to grow more than any other area in the city to 2036.

Creating new attractions and facilities to meet the needs of this increased population and improving connections to, between and within each park presents both challenges and opportunities to transform the appearance and increase activation of the West Park Lands Precinct.

There is opportunity to investigate a shared-use bridge over the train lines to connect the South Australian Sports Institute with Adelaide Park Lands Trail. This opportunity links key state government investment to the Adelaide Park Lands whilst also providing the missing link to the western suburbs for commuter cyclists and pedestrians.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

1. Wirrarninthi wetlands
2. Desert Ash plantings
3. Grove of Moreton Bay Figs
4. Row of Desert Ash
5. Canary Island Palms
6. Row of Desert Ash
7. Hill's Fig
8. Row of Morton Bay Figs
9. Row of Pepper Trees
10. Former tram lines
11. Manage car parking availability in Wylde Street to ensure use for park users

Consider Local Heritage Listing of

12. Kingston Gardens and bandstand
13. Emigration Square/Bureau of Meteorology Memorial interpretive site
14. Adelaide High School

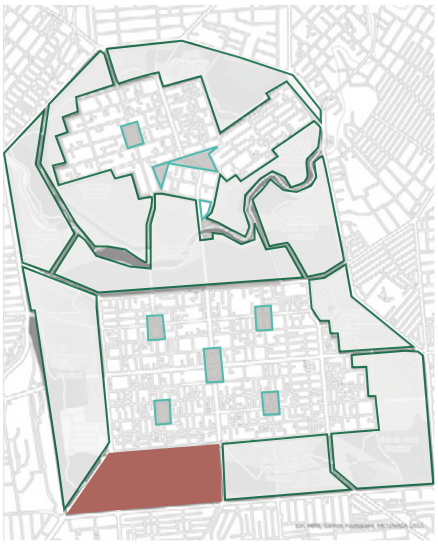
Future Considerations

15. Enhance landscaping of Sir Donald Bradman Drive and Glover Avenue with planting of large eucalyptus
16. Create a hub to support environmental education and manage as a Key Biodiversity Area into the future
17. Improve water quality and mitigate downstream urban stormwater impacts
18. Enhance the Wirrarninthi Interpretive Trail
19. Investigate opportunity to connect Adelaide Park Lands Trail to South Australian Sports Institute via shared-use bridge
20. Create an urban address as a response to a growing population in the city's west
21. Improve connectivity across Sir Donald Bradman Drive via land bridges/wildlife bridges
22. Link the Adelaide Park Lands to the Squares
23. Investigate opportunities to construct a footbridge over Glover Terrace
24. Upgrade existing hub to better service the South West corner of the city
25. Upgrade existing hub and manage City Skate Park as a regional/state level facility
26. Consider future requirements for the Cemetery through master planning
27. Create a hub and continue to enhance the Narnungga Urban Forest. Explore additional uses of this space, especially regarding its potential biodiversity values
28. Investigate removal of hardstand areas in Edwards Park/Wirrarninthi (Park 23 South) and return to a Park Lands Purpose.

West Park Lands Precinct



South-West Park Lands Precinct



Precinct Snapshot

Parks included in Precinct

- Josie Agius Park/Wikaparntu Wirra (Park 22)
- Golden Wattle Park/Mirnu Wirra (Park 21 West)
- Veale Park/Walyu Yarta (Park 21)

Size of Precinct

88 hectares or 9.4% of the total area of the Adelaide Park Lands

Tree Count and Canopy

32% canopy cover provided by 7,222 trees

Key Precinct Uses

- Veale Gardens
- Princess Elizabeth Playspace
- Regional Netball Facility
- Key Biodiversity Area
- Lundie Gardens
- Adelaide Pavillion
- Walyu Yarta Community Garden

Context

The South-West Park Lands Precinct is bordered by South Terrace, Anzac Highway, Greenhill Road and Peacock Road. The land use is relatively balanced between high to medium quality remnant native grassland and woodland and a mixture of dedicated sports (netball, soccer, tennis and multi-use fields). The northern section has high-quality play spaces and formal gardens while the facilities and some landscape values in southern section are in need of revitalisation.

Kaurna

The Precinct was regularly used as a camping venue, a source of food and site for burials. Traditional camping stopped in this area in the 1860s when Aboriginal peoples were forced from the south Park Lands.

Some Kaurna people associate areas in Golden Wattle Park/Mirnu Wirra (Park 21 West) with spiritual danger and believe this park has historical links to suspected colonial violence in the dispossession of their ancestors.

Historic Heritage

Golden Wattle Park/Mirnu Wirra (Park 21 West) and Veale Park/Walyu Yarta (Park 21) were once considered a single park, however upon the introduction of Sir Lewis Cohen Avenue (1902–1903) the two parks were separated. The area is bound by Peacock Road, Greenhill Road, South Terrace and Sir Lewis Cohen Avenue.

The remainder of the Precinct retains its original shape and form as devised by Colonel William Light.

Substantial tree planting that accords with the design and species intent of Brown and Pelzer, such as species plantings and pathway alignments are intact today.

Landscape

Featuring large areas of open woodland, smaller dispersed areas of remnant native vegetation and playing fields, the South-West Park Lands Precinct accommodates a mix of dedicated sport facilities for netball, soccer and tennis with less emphasis on multi-use playing fields.

Veale Gardens boasts highly refined landscaping features, including creeks, fountains and exotic vegetation. There are several contemporary structures within the gardens, including the Walyu Yarta Community Garden, and the Adelaide Pavilion.

North-south and east-west routes are limited and do not connect well to the city or the suburbs.

Activation, other than that provided by sporting uses, Veale Gardens, and Princess Elizabeth Playspaces, is limited.

The management of Key Biodiversity Areas will be primarily focused on their conservation and sustainable expansion rather than activation.

The Precinct will continue to support environmental education and provide a space for the engagement of community volunteers and education groups.

Drivers for Change

Nestled between a strong and growing south-west city community to the north and an increasingly intensive corridor of mixed-use development along Greenhill Road in the south, the South-West Precinct is well positioned to attract city and suburban residents and workers from Keswick, Wayville and Unley into the Adelaide Park Lands for a variety of recreational and sports activities. The community's positive response to the redevelopment of the Princess Elizabeth Playspace attests to the potential benefits to be realised from improving the appearance and functionality of areas fronting South Terrace.

Ensuring that the urban address provides an attractive frontage to the Adelaide Park Lands' northern and southern edges will be critical in enticing more people into the Precinct, especially in the south as these sections of the Adelaide Park Lands are currently under-utilised with low visitation rates.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors, remnant plant species and associated biodiversity from the Mallee Box Woodland and Grey Box/SA Blue Gum Woodland that was managed by Kaurna Miyurna.

1. Pine trees south of the Princess Elizabeth Playground
2. The Sugar Gum avenue
3. Remnant wattle and white cypress pines grove plantings
4. Lundie Garden
5. Perimeter woodland planting
6. Veale Gardens
7. Moreton Bay Fig Avenue
8. Nurses Memorial Garden
9. Manage car parking for the Royal Adelaide Show according to the Deed of Agreement with the Royal Agricultural and Horticultural Society of SA
10. Manage Key Biodiversity Areas towards their corresponding pre-European vegetation communities (composition and structure)
11. Continue to manage as an informal recreation area

Consider Local Heritage Listing of

12. Princess Elizabeth Playspace, including sign, original trees and shelter shed

Future Considerations

13. Investigate the removal of access road and return to a Park Lands Purpose
14. Create an urban address to incorporate off-road cycling movement, and improved public transport accessibility
15. Align shared-use path with lighting that is appropriate/sensitive to biodiversity
16. Link the Adelaide Park Lands to the city and suburbs by developing strong 'green street' connections
17. Realign the Adelaide Park Lands Trail and investigate signalised crossing over Goodwood Road
18. Improve pedestrian crossing points at Greenhill Road / Anzac Highway intersection
19. Create a hub and continue to support the Community Garden
20. Investigate consolidation of hardstand and buildings within the Precinct in consultation with stakeholders and adjoining councils
21. Provide a fenced, off-leash dog park that is able to utilise facilities and car parking associated with the adjacent netball hub
22. Investigate upgrade or redevelopment of community buildings
23. Provide a new playspace within the park

South-West Park Lands Precinct

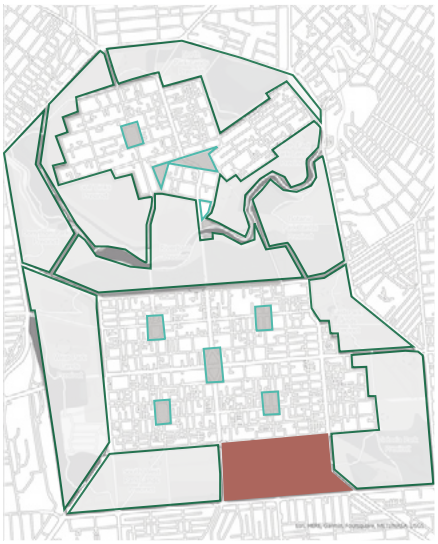


Precinct Boundary
Existing Features
Future Considerations

Movement
Active Transport Connections
Active Transport Paths
Adelaide Park Lands Trails
Potential Adelaide Park Lands Trail Realignment
Edge Paths
Shared Paths
Promenade
Green Street
Bikeway

Landscape
Existing Hub
Future Hub
Urban Address
Sport and Recreation
Woodland / Grassland
Formal Park
Views + Vistas

South-East Park Lands Precinct



Precinct Snapshot

Parks included in Precinct

- Part of Carriageway Park/Tuthangga (Park 17)
- Peppermint Park/Wita Wirra (Park 18)
- Pelzer Park/Pityarilla (Park 19)
- Blue Gum Park/Kurangga (Park 20)

Size of Precinct

57 hectares or 6.1% of the total area of the Adelaide Park Lands

Tree Count and Canopy

39% canopy cover provided by 4.002 trees

Key Precinct Uses

- Sporting fields and courts
- Petanque piste
- Glover Playground
- Marshmallow Park and Oxbow playspace
- City Dirt – BMX Park
- Fenced dog park
- TreeClimb Adelaide
- Himeji Gardens
- Osmond Gardens
- South Park Lands Creek
- Contributory historic features such as memorials, exotic species, avenues and corridor

Context

The South-East Park Lands occupy the area between Peacock Road and Hutt Street. These parks primarily accommodate sporting fields which are used by schools and clubs for hockey, soccer, tennis, Australian Rules Football, basketball, cricket, athletics, softball and petanque. In order to support these activities, the usability of sports fields and playing courts across the Precinct needs to be improved with their associated buildings revitalised. Areas of open woodland surrounding the sports fields and courts are prominent landscape features with many large, beautiful trees fronting Park Land edges.

Kaurna

The Precinct was regularly used as a camping venue, a source of food and site for burials. Traditional camping stopped in this area in the 1860s when Aboriginal peoples were forced from the south Park Lands.

Historic Heritage

The Precinct maintains the shape designed by Colonel William Light and substantial tree planting, incorporating perimeter pathways and sweeping paths, including a large mass planting in the southern corner.

The introduction of Osmond Gardens in 1907, provided a formal gardenesque landscape and considerably change the landscape.

The Himeji Garden, opened in 1985, represents Japanese garden design principles. The grounds are frequently used for formal events and weddings.

There is evidence of Brown and Pelzer's design intent throughout the Precinct.

Landscape

The Precinct is characterised by a combination of open woodlands and sports fields. The landscape is characterised by large open grassed spaces semi-enclosed by predominantly native groves of trees, with open spaces generally used for sporting activities.

The area is renowned for its significant vegetation elements, particularly avenues such as Kurrajong Avenue, Sellar Avenue of White Cedars, Lombardy Poplar Avenue, and White Poplar Avenue.

Significant changes have been made to the creek system in an attempt to naturalise it and encourage public visitation. This includes bank lay-backs and native revegetation to increase biodiversity, facilitate wildlife movement, and improve water quality.

Drivers for Change

Growing resident and worker populations in the south of the city and the north of Unley, Parkside and Eastwood provide the impetus for a reimagined Adelaide Park Lands environment that will enable more people to participate in a variety of recreational and sports activities.

The urban address plays an important role in drawing people into the Precinct while access to the various amenities supporting recreation and sport will be enhanced to activate the parks, facilitate higher levels of social interaction and provide for casual surveillance.

As a pre-eminent sport and recreation precinct in the Adelaide Park Lands, improvements to playing fields, courts and sports infrastructure will fuel the community's capacity to participate in a wide range of physical activities with positive health and wellbeing outcomes.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Sugar Gum Avenue – Ponder Avenue
2. English Elms and Desert Ash in playground
3. Stone Pines
4. Kurrajong Avenue
5. Sellar Avenue (White Cedar)
6. Manage Osmond Gardens and Himeji Gardens as significant public attractions
7. Continue stormwater management and flood mitigation
8. Manage car parking availability for Precinct visitors
9. Manage Marshmallow Park as a major regional activity hub for informal recreation

Consider Local Heritage Listing of

10. Osmond Gardens
11. Himeji Gardens
12. Glover Playground

Future Considerations

13. Explore opportunities to naturalise the drainage line along Glen Osmond Road whilst retaining important historic features
14. Pursue convenient and safe access across adjoining main roads (Greenhill Road)
15. Improve the long-term management of creek and drainage lines by removing weeds and continuing to pare back creek banks and reintroduce native vegetation
16. Create an urban address to incorporate off-road cycling movement, an improved public transport accessibility
17. Link the Adelaide Park Lands to the city and suburbs by developing strong 'green street' connections
18. Manage the BMX track as a regional youth activity hub and seek opportunities to upgrade including increased amenities
19. Integrate community courts further into the Precinct and promote community use of courts
20. Create a hub that delivers an urban gateway plaza to the city
21. Transform this area into a Formal Park with a number of prominent sculptures
22. Investigate upgrade or redevelopment of community buildings
23. Investigate consolidation of hardstand and buildings within the Precinct in consultation with stakeholders and adjoining councils

South-East Park Lands Precinct



Precinct Boundary
Existing Features
Future Considerations

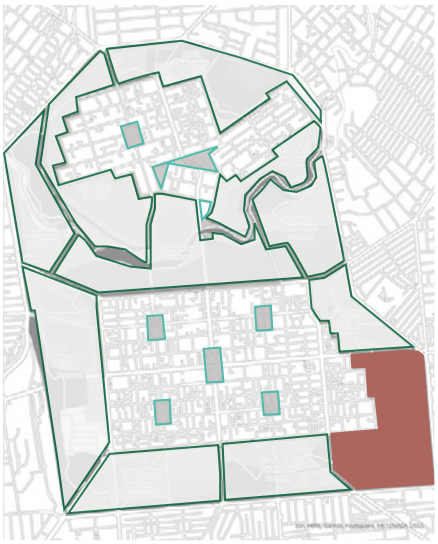
Movement

Active Transport Connections
Active Transport Paths
Adelaide Park Lands Trails
Edge Paths
Shared Paths
Promenade
Green Street
Bikeway

Landscape

Existing Hub
Upgrade Existing Hub
Future Hub
Urban Address
Riparian
Sport and Recreation
Woodland / Grassland
Formal Park
Views + Vistas

Victoria Park Precinct



Precinct Snapshot

Parks included in Precinct

- Victoria Park/Pakapakanthi (Park 16)
- Carriageway Park/Tuthangga (Park 17)

Size of Precinct

42 hectares or 4.5% of the total area of the Adelaide Park Lands

Tree Count and Canopy

26% canopy cover provided by 4,045 trees

Key Precinct Uses

- Major event space for motor racing and Adelaide Equestrian Festival
- Criterium cycling track
- Botanic and Park Lands Creek
- Pakapakanthi Wetlands
- Sporting fields
- Walking and running loops
- Victoria Park Precinct – grandstand and surrounding buildings State Heritage Places
- Historic Elm Carriageway
- Historic Glenelg Service Water Reservoir
- Contributory historic features such as memorials, exotic species, avenues and corridor

Context

The Victoria Park Precinct occupies the area between Hutt Street, Greenhill Road, Fullarton Road and Wakefield Road.

The Precinct provides for a diverse range of formal and informal activities, with Victoria Park/Pakapakanthi (Park 16) providing an important regional open space.

The Precinct plays an important role in affording uninterrupted views from the city to the Adelaide Hills – one of the key National Heritage Values.

Previously home to horse racing, the Precinct hosts motor sport events and the cycling criterium track, both unique assets of regional importance.

Kaurna

History held by members of the Kaurna community indicates that the area was used for camping and corroborees.

In 1980, members of the Pitjantjatjara, Yankunytjatjara, and other Aboriginal Elders from the north-west of the state converged here to protest for Aboriginal Land Rights. This stand ultimately led to the passage of the *SA Pitjantjatjara Land Rights Act, 1981* and the establishment of the freehold Aboriginal Lands in the north-west of the state.

On 14 May 2021, the Kaurna community and the City of Adelaide collaboratively delivered the first Kaurna Kardla Parranthi Cultural Burn Project in Carriageway Park/Tuthangga (Park 17).

Historic Heritage

The Precinct retains its original shape and design from Colonel William Light's Plan.

The area south of Botanic Creek holds state and national significance, hosting the inaugural Arbor Day Plantings in 1889 and reviving them in the late 1980s. The 1880s Grandstand, Victoria Park Racecourse is registered as a State Heritage Place.

Landscape

The Precinct comprises of open woodlands and sports with a riparian corridor. There are two watercourses

through the Precinct including the Park Lands Creek and Botanic Creek.

It is characterised by large open grassed spaces, generally used for sporting activities, that are semi-enclosed by predominantly native groves of trees.

Victoria Park/Pakapakanthi (Park 16) contains a Key Biodiversity Area with remnant and rare vegetation including important grasslands. Expansion of the Key Biodiversity Area aims to restore the site to a Grey Box Grassy Woodland.

There will be an ongoing commitment to the management of the conservation values for the remnant vegetation site and the protection of the Chequered Copper Butterfly (Lucia limbaria) habitat in the park.

Carriageway Park/Tuthangga (Park 17) contains significant areas of remnant native vegetation currently managed by community volunteers, an avenue of mature Elm trees and the upper reaches of the Park Lands Creek network. The Precinct also accommodates playing fields, courts and spaces for active and passive activities.

The 3.2 hectare Pakapakanthi Wetlands is a key feature of the Precinct and provides water quality improvements, fauna habitat, flood risk mitigation and a high-quality natural asset for outdoor recreation and fauna habitat.

A network of pathways provide access to and through the Precinct including primary commuter routes from the eastern suburbs.

Activity occurs throughout the Precinct with high demand during events and festivals.

Amenity and activities will be introduced more broadly across the Precinct in accordance with the 2024 Master Plan for Victoria Park/Pakapakanthi (Park 16) which prioritises the following principles:

- Be greener, cooler and more climate resilient
- Celebrate cultural and social values
- Continue to provide space for unprogrammed community use and connection to nature
- Be biodiverse and improve Adelaide's open grassy woodland landscape character
- Provide consistent quality community sports and recreation
- Be a park that attracts and supports a diverse range of events and activities.

Drivers for Change

Located opposite an increasingly diverse south-east community and expanding health and medical precinct in the city, and increasing inner-suburban resident and worker populations in Unley, Eastwood and Dulwich to the south and east, the Victoria Park Precinct will continue to attract users for a diverse range of sport and recreation pursuits. Improving connections and wayfinding to Hutt Street main street could also encourage visitors to the Precinct.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors with significant native revegetation.

1. Major stands of River Red Gums
2. Sugar Gum Avenue – Ponder Avenue
3. Olive Grove with heritage value
4. Arbor Day Tree Planting
5. Manage Key Biodiversity Area 1 as a Grey-box Woodland and continue to support community initiatives
6. Former offices of the Adelaide Racing Club
7. Kiosk and café
8. The white concrete planter bowl (horse racing history)
9. Former Glenelg Reservoir and fencing
10. Tuthangga Survey Benchmark
11. Butterfly conservation zone
12. High quality Grey-box Woodland remnant vegetation

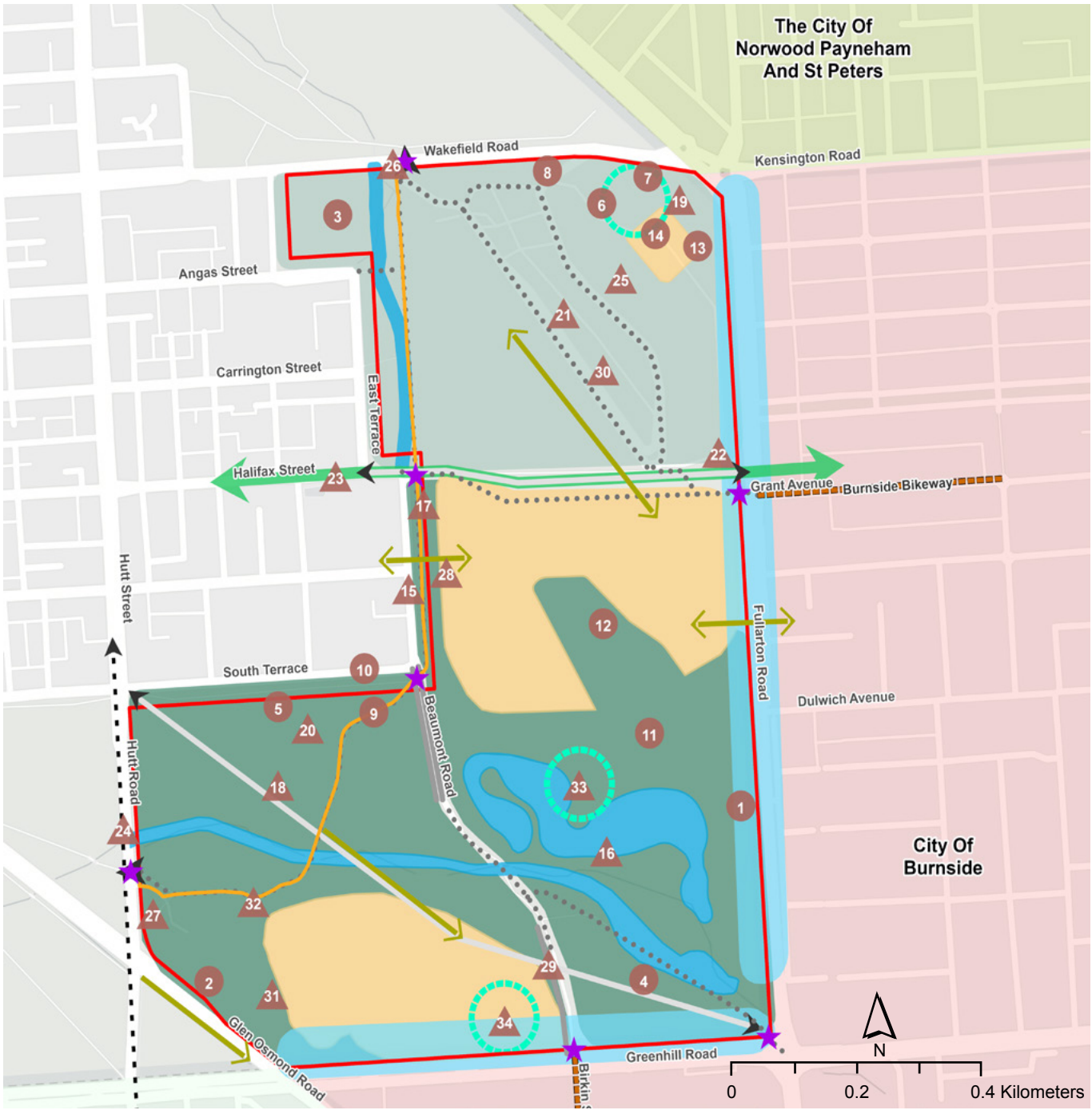
Consider Local Heritage Listing of

13. Turnstile Building and Grandstand Entrance Gates
14. Heritage Grandstand

Future Considerations

15. Reveal existing stormwater drains and increase opportunities for interaction with the existing Botanic and Park Lands Creek to the south
16. Continue to monitor Pakapakanthi wetland and seek opportunities to capitalise on its novel ecosystems for species conservation
17. Reinforce the distinct landscape of Victoria Park/ Pakapakanthi (Park 16) through additional tree planting to pathways while maintaining open areas for grassland and biodiversity planting
18. Capitalise on Elm Avenue
19. Provide additional cultural history signage and interpretive material
20. Enhance Kaurna Kardla Parranthi – cultural burn site
21. Improve the path network to reduce conflicts between pedestrians, cyclists and joggers through new and improved pathways
22. Create new and enhance the existing nodes along key pedestrian access points and strengthen connectivity into the city from neighbouring suburbs
23. Create strong 'green street' connections linking with key walking and cycling networks
24. Install signalised crossing to enhance safety of Adelaide Park Lands Trail
25. Create a strong physical and visual connection between the Grandstand and the adjacent Adelaide Park Lands spaces by creating a new hub
26. Investigate opportunities for safer crossing point for Wakefield Road
27. Create a Formal Park to frame Glen Osmond Road and Hutt Street gateways
28. Incorporate elements of play along a restored creek line
29. Implement smart technologies and environmental monitoring
30. Continue to work with SA Motor Sport Board to minimise disruption to community access including pre and post events and minimise environmental impact

Victoria Park Precinct



Precinct Boundary
Existing Features
Future Considerations

Movement
Active Transport Connections
Adelaide Park Lands Trails
Edge Paths
Shared Paths
Promenade
Green Street
Access Road
Bikeway

Landscape
Future Hub
Urban Address
Riparian
Sport and Recreation
Woodland / Grassland
Formal Park
Views + Vistas

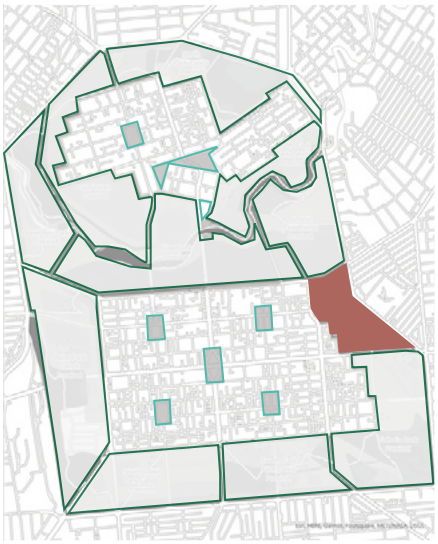
31 Relocate amenities block closer to the Pakapakanthi Wetland

32 Investigate consolidation of hardstand and buildings within the Precinct in consultation with stakeholders and adjoining council

33 Create a hub to support environmental education at the Pakapakanthi wetland

34 Investigate upgrade or redevelopment of community buildings

East Park Lands Precinct



Precinct Snapshot

Parks included in Precinct

- Rundle Park/Kadlitpina (Park 13)
- Rymill Park/Murlawirrapurka (Park 14)
- King Rodney Park/Ityamai-itpina (Park 15)

Size of Precinct

42 hectares or 4.5% of the total area of the Adelaide Park Lands

Tree Count and Canopy

37% canopy cover provided by 2,036 trees

Key Precinct Uses

- Major event spaces
- Botanic Creek
- Rymill Lake
- Quentin Kenihan Inclusive Playspace
- Petanque piste
- Peace and Friendship Garden
- Adelaide Bowling Club
- Sporting fields
- Glover East Playground
- O-Bahn busway tunnel entrance/exit
- Basketball courts and skate park
- Contributory historic features such as memorials, exotic species, avenues and corridors

Context

One of the most visited Precincts of the Adelaide Park Lands, the East Park Lands hosts a diverse range of events including the Adelaide Fringe Festival, motor racing, the Australian International Three Day (Equestrian) Event and various food and community festivals.

These events attract large numbers of local, national and international visitors to its gardenesque and attractive semi-natural landscapes.

The Precinct provides a key gateway into the city from eastern Adelaide.

Kaurna

The Precinct was a major camping area (1840s–1900) for Kaurna People and would have been an area of swamp leading into the waterhole in the Botanic Garden providing a wealth of food and resources.

The 'Place of Reflection' in Rymill Park/Murlawirrapurka (Park 14) is a dedicated space for members of the Stolen Generations, and their family, friends and wider community to meet and support each other. The space is designed to highlight the important links between the natural world and cultural lives of Aboriginal and Torres Strait Islander peoples.

Historic Heritage

Overall Rundle Park/Kadlitpina (Park 13), Rymill Park/Murlawirrapurka (Park 14) and King Rodney Park/Ityamai-itpina (Park 15) retain their original shape and form as devised by Colonel William Light. There is evidence of substantial tree planting that accords with the general spatial and species intent of Brown, Pelzer and Pengilly, including pathway alignments and species plantings that reinforce a semi-formal Victorian style.

A cross-axial pathway lined with white cedars dissects Rundle Park/Kadlitpina (Park 13) and has been evident since the 1870s.

Two cross-axial pathways, evident since the 1870s, and lined with Oriental Planes and White Cedars, dissect Rymill Park/Murlawirrapurka (Park 14). Both pathways constitute important Precinct aesthetic and design elements.

In the 1950–1960s, Rymill Park/Murlawirrapurka (Park 14) was transformed to accommodate a lake, picnic and recreation grounds, as well as a large formal rose garden planting layouts.

The Precinct contains Local Heritage Places of significance. The War Horse Memorial Trough and Obelisk are located near Wakefield Road. The Valve House, which was moved and rebuilt in the eastern end of RundlePark/ Kadlitpina (Park 13), is the last remaining structure from the Kent Town Waterworks, demolished in the 1980s.

The Alice in Wonderland Statue and the Picanniny Statue in Rymill Park/Murlawirrapurka (Park 14) are considered to be of cultural and historic importance and are potential Local Heritage Places.

The Rymill Park/Murlawirrapurka (Park 14) 1961 design features including the lake, footbridges, sign, rose gardens and sundial, are also considered to be of cultural and historic importance.

Landscape

Rundle Park/Kadlitpina (Park 13) and Rymill Park/ Murlawirrapurka (Park 14) are structured and highly utilised parks.

King Rodney Park/Ityamai-itpina (Park 15) is characterised by large open grassed spaces semi-enclosed by predominantly native groves of trees. Open spaces are generally used for sporting activities. Significant areas of native vegetation and revegetation exist in this Park including native grasses.

The southern section of Rundle Park/Kadlitpina (Park 13) functions as an open public garden, containing the well-maintained Rymill Park Rose Garden and picnic facilities.

Enhancement of Adelaide Park Lands Trail and key promenades will further reinforce primary north-south and east-west connections. This will occur within a defined path hierarchy.

Activated temporarily by key Adelaide events, the Precinct has temporary hubs as well as defined sporting hubs.

The Rymill Lake renewal project, reopening of the Rymill Park Kiosk and Botanic Creek rehabilitation will further activate an already well-loved Precinct.

Drivers for Change

Population growth in the city's east and in Kent Town and Norwood provide a strong impetus for reimagining the future of the East Park Lands and building on its proximity to a number of key state government investment sites.

The O-Bahn busway extension running underneath and through Rymill Park/Murlawirrapurka (Park 14) will continue to have a significant impact on how the Precinct will develop in the future, while Lot Fourteen will shape many of the activities occurring in Rundle Park/Kadlitpina (Park 13).





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors with significant native revegetation.

1. Aleppo Pine stand
2. White Cedar avenues
3. Camphor Laurel circle
4. Northern Rose Garden
5. Southern Rose Garden
6. London Plane Tree avenue
7. Olive grove
8. SA Blue Gum avenue
9. Pepper Tree avenue
10. Manage car parking availability to ensure use by patrons visiting the Precinct including the public car park adjacent the Adelaide Bowling Club
11. Retain community access to Quentin Kenihan Inclusive Playspace for daylight hours during event times
12. Manage the Glover East Playgrounds recognising its heritage value and provide upgrades to this hub to for additional community benefit

Consider Local Heritage Listing of

13. Valve house
14. Alice in Wonderland statue
15. The 1961 landscape design of Rymill Park Murlawirrapurka (Park 14) including the lake, footbridges, sign, rose gardens and sundial
16. Glover Playground including shelter shed, sign and original trees
17. Manage the war memorial horse trough and obelisk

Future Considerations

18. Complete the Rymill Lake renewal project
19. Reveal existing stormwater drains and increase opportunities for interaction with the existing Botanic Creek and Park Lands Creek to the South
20. Create a promenade which strengthens the east-west links
21. Create strong 'green street' connections
22. Link the Adelaide Park Lands to the city
23. Provide active transport connection linking to King William Street
24. Support the re-opening of the Rymill Park Kiosk
25. Investigate opportunity to reimagine the skate park in King Rodney Park/Ityamai-itpina (Park 15)
26. Open up the bowling club to engage with its Adelaide Park Lands surroundings

East Park Lands Precinct



Precinct Boundary
Existing Features
Future Considerations

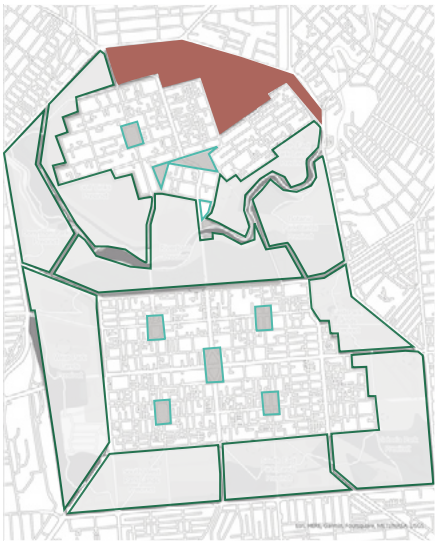
Movement

Active Transport Connections
Active Transport Paths
Adelaide Park Lands Trails
Edge Paths
Shared Paths
Promenade
Green Street
Access Road
Bikeway

Landscape

Existing Hub
Upgrade Existing Hub
Urban Address
Riparian
Sport and Recreation
Woodland / Grassland
Formal Park
Views + Vistas

North Park Lands Precinct



Precinct Snapshot

Parks included in Precinct

- Denise Norton Park/Pardipardinyilla (Park 2)
- Yam Daisy Park/Kantarilla (Park 3)
- Reservoir Park/Kangatilla (Park 4)
- Bragg Park/Ngampa Yarta (Park 5)
- Lefevre Park/Nantu Wama (Park 6)
- The Olive Groves/Kuntingga (Park 7)
- The Olive Groves/Parngutilla (Park 8)

Size of Precinct

84 hectares or 9% of the total area of the Adelaide Park Lands

Tree Count and Canopy

33% canopy cover provided by 5,303 trees

Key Precinct Uses

- Bush Magic Playground
- Glover Playground
- Adelaide Aquatic Centre
- North Adelaide Dog Park
- Sport and recreation playing fields
- Horse depasturing
- Key Biodiversity Areas
- Biodiverse Carbon Offset Planting
- Contributory historic features such as exotic species, avenues and corridors

Context

The North Park Lands encompass the area between Jeffcott Street in the west to the intersection of MacKinnon Parade with Hackney Road in the east. The precinct accommodates a diverse range of facilities and activities for public use. These include the increasingly popular North Adelaide Dog Park, the large horse paddocks and the State Heritage Place Olive Groves off Mann Terrace and the redevelopment of the Adelaide Aquatic Centre.

High quality recreation spaces exist within the Precinct to serve North Adelaide and the open space needs of adjoining communities.

Kaurna

There is general reference that points to the regular use of the Adelaide Park Lands as a camping area and there probably would have been camp sites in the Precinct. It has been noted that it is likely that Aboriginal trade routes passed through Denise Norton Park/Pardipardinyilla (Park 2), Yam Daisy Park/ Kantarilla (Park 3), Reservoir Park/Kangatilla (Park 4) and Bragg Park/Ngampa Yarta (Park 5) and that they would have been traditional hunting country. Some sites in the Precinct may contain Aboriginal burials.

Historic Heritage

The Precinct does not contain any State or Local Heritage Places, however Kangatilla contains the SA Water Reservoir site which was nominated as a State Heritage Place by the City of Adelaide.

Overall the Precinct retains the original shape and form as devised by Colonel William Light. The only variation is the realignment of Lefevre Road to intersect with Main North Road, but its original alignment is still evident by the retention of some of the original street tree plantings.

There is evidence of underlying planting structures by Brown and Pelzer throughout the Precinct which contains a variety of vegetation and natural elements of heritage value.

Landscape

The Precinct is characterised by large open grassed spaces semi-enclosed by predominantly native groves of trees, with open spaces generally used for sporting activities.

Significant areas of native vegetation and revegetation exist. There are two Key Biodiversity Areas within the Precinct which will continue to be enhanced and protected.

Nineteenth-century perimeter planting contains some of the largest and most significant trees in the Precinct.

Densely planted pines, Red Gums and Sugar Gums stand in excellent condition along the north and east perimeter of the Precinct.

The Glover Playground is situated central to the western perimeter, established in 1920 with a donation from the then Lord Mayor Charles Glover.

Enhancements to the Adelaide Park Lands Trail and alignment with the new Adelaide Aquatic Centre provide the main pedestrian and cycling access to the Precinct.

There is some distance between the few points of activity that are predominantly focused around playspaces, the North Adelaide Dog Park and the Adelaide Aquatic Centre. Works along Prospect Road have improved access to the playing courts.

The redevelopment of the Adelaide Aquatic Centre, renewal of the Bush Magic Playground and the Adelaide Park Lands interface will provide for a hub within the Precinct.

There has been a long association with horse depasturing in Lefevre Park/Nantu Wama (Park 6) along with a bridle track. The bridal track originally opened in 1939.

Depasturing is grazing of the natural resources of the land and is managed by the City of Adelaide through a depasturing licences.

Lefevre Park/Nantu Wama (Park 6) will continue to include areas for horses to depasture and a bridle track. This area also contains significant areas of biodiversity which will continue to be managed as Key Biodiversity Area 4.

Drivers for Change

The Adelaide Aquatic Centre in Denise Norton Park/ Pardipardinyilla (Park 2) is currently under redevelopment by the Government of South Australia. The new facility will ensure this park remains a key destination in the North Park Lands Precinct and will provide state of the art aquatic facilities at a regional scale.

Denise Norton Park/Pardipardinyilla (Park 2) also contains a range of recreational and sporting landscapes for formal and informal facilities for cricket, tennis and family picnics. The Bush Magic Playground, which is due for renewal, will form part of a wider urban design upgrade to Denise Norton Park/ Pardipardinyilla (Park 2) as part of the Adelaide Aquatic Centre redevelopment.

Growing resident and worker populations in Fitzroy, Prospect, Medindie, Gilberton and North Adelaide provide a significant opportunity to increase activation of the Precinct by adding value to existing facilities and creating new attractions.

The redevelopment of the Adelaide Aquatic Centre is likely to draw people into the Precinct from across the metropolitan area. The potential development of a light rail connection through North Adelaide extending north along Prospect Road, together with planned improvements to greenways and bikeways connecting the city with the northern and western suburbs, will result in greater numbers of people moving through the Precinct.

The renewal of the Bush Magic Playground with contemporary design and the inclusion of outdoor learning opportunities will provide further activation of the Precinct. There is an opportunity to investigate the return of Lefevre Road between Main North Road and Lefevre Terrace, which is under the care, control and management of the City of Adelaide to Park Lands Purpose. This would reconnect Reservoir Park/Kangatilla (Park 4) and Bragg Park/Ngampa Yerta (Park 5).

Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. River Red Gums and SA Blue Gums
2. Norfolk Island Pines
3. Canary Island Date Palms
4. Aleppo Pines
5. Port Jackson Fig
6. Tree species along Jeffcott Road
7. Horse depasturing and paddock configuration
8. Pedestrian pathways
9. Remnant native vegetation
10. Kingston Terrace woodland
11. Sugar Gum plantation
12. Aleppo Pine plantation
13. Maintain stormwater detention basin adjacent Robe Terrace
14. The Olive Groves/Kuntingga (Park 7) and The Olive Groves/Parngutilla (Park 8)
15. Habitat of rare Chequered Copper Butterfly (Lucia limbaria)
16. Biodiverse Carbon Offset Planting Demonstration Site
17. Key Biodiversity Area #3 and #4
18. Protected Conservation Zone – Remnant Mallee Box Woodland
19. Manage Key Biodiversity Areas as Mallee Box Woodland

Consider Local Heritage Listing of

20. SA Water reservoir
21. Glover Playground signage and fence posts

Future Considerations

22. Support planting of additional screening vegetation around SA Water and SAPN facilities
23. Undertake traffic modeling and consultation with community and Department for Infrastructure and Transport to investigate the closure of Lefevre Road and return to a Park Lands Purpose
24. Undertake enhancement and required realignment to the Adelaide Park Lands Trail to support movement across and in the Precinct
25. Upgrade the existing Glover Playground hub for informal recreation and include further nterpretation of heritage elements
26. Relocation and development of a new aquatic facility (incorporating upgraded landscaping and other works to surrounding areas) within Denise Norton Park/Pardipardinyilla (Park 2)
27. Return former Adelaide Aquatic Centre to a Park Lands Purpose
28. Renew playspace and integrate into a hub with links to the new Adelaide Aquatic Centre
29. Support enhancement of the former sports field in Reservoir Park/Kangatilla (Park 4) into a biodiversity-focus hub that prioritises community use

North Park Lands Precinct



Precinct Boundary
Existing Features
Future Considerations
Movement
Active Transport Connections
Adelaide Park Lands Trails
Edge Paths
Shared Paths
Green Street
Bikeway
Landscape
Existing Hub
Upgrade Existing Hub
Future Hub
Urban Address
Sport and Recreation
Woodland / Grassland
Formal Park
Views + Vistas

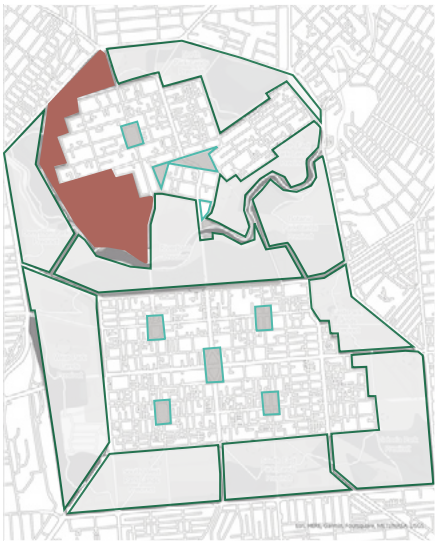
30 Investigate the removal of under-utilised tennis courts and return to a Park Lands Purpose

31 Investigate upgrade or redevelopment of community buildings

32 Investigate consolidation of hardstand and buildings within the Precinct in consultation with stakeholders and adjoining councils

33 Upgrade the North Adelaide Dog Park hub to improve accessibility

Golf Links Precinct



Precinct Snapshot

Parks included in Precinct

- Possum Park/Pirltawardli (Park 1)

Size of Precinct

72.4 hectares or 7.8% of the total area of the Adelaide Park Lands

Tree Count and Canopy

34.4% canopy cover provided by 3,289 trees

Key Precinct Uses

- Two full-size, 18-hole golf courses (referred to as 'North Course' and 'South Course')
- Par 3 golf course
- North Adelaide Golf Clubhouse
- Mills Terrace community tennis courts
- Historic Strangways Terrace fence posts
- Contributory historic features such as exotic species, avenues and corridors
- Remnant vegetation
- Views and vistas

Context

The Golf Links Precinct occupies the area bordered by War Memorial Drive, Park Terrace, Jeffcott Road, Barton Terrace, Mills Terrace, Strangways Terrace, Railway lines and Montefiore Road.

Accommodating mostly golfing activities associated with the City of Adelaide Golf Links, Possum Park/ Pirltawardli (Park 1) is characterised by wide open spaces surrounded by magnificent boulevards of large trees.

Kaurna

As part of the Red Kangaroo Dreaming this area is significant to Kaurna people and plays a central role in our shared history.

A portion of Pirltawardli or 'Native Location' was located in this park and has importance to the Kaurna community. Subsurface archaeological deposits may exist.

History held by members of the Kaurna community indicates that this was a site for boxing tournaments up until the 1960s. North of the weir is where Aboriginal people used to gather and were not allowed to cross to the south side of the river in the early 1900s.

It was the place of the first Colonial Iron Store, Tinninyawodli and later became a place of hangings for Aboriginal and European people.

Prior to European settlement, the landscape of the area would have been characterised by River Red Gum and SA Blue Gum Woodland in the southern section of the Park and Mallee Box Woodland in the northern section of the Park.

Historic Heritage

North Adelaide Golf Course developed early in the twentieth century, expanded in the 1920s, and further extended northwards in the 1940s. A smaller Par 3 course to the south was added in the 1960s.

The planting implemented to service the golf course was introduced by August Pelzer, following from

Brown's species selection proposal, but adapted to suit the golf course design.

The area is highly significant to the early history of Adelaide's establishment, being located on one of the main transport routes from Port Adelaide.

Landscape

The landscape is predominantly irrigated golf fairways and greens set amongst an open woodland.

Greater variety is proposed through the introduction of Formal Parks and an urban address to the edges of the Precinct.

There is currently very little access around or through the golf links.

A number of key connections are proposed providing links to North Adelaide, Bonython Park/Tulya Wardli (Park 27) and Bowden. Formalised edge paths are provided for improved pedestrian amenity.

The focus will be on improving the North Adelaide Golf Course Club House to increase amenity within the Precinct.

Drivers for Change

Expanding resident and worker populations in Bowden and Brompton, and a maturing population in North Adelaide will fuel the demand for a broader range of recreational and sporting activities, particularly in the northern sections of the Precinct. The Bowden Urban Village development, extension of the Adelaide Aquatic Centre and revitalisation of the Riverbank is likely to attract more people (local residents and visitors) into the Precinct. Establishing better facilities and connections will be an important way of encouraging people to stay longer and explore the diverse cultural and natural landscapes that characterise Possum Park/Pirltawardli (Park 1).



Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

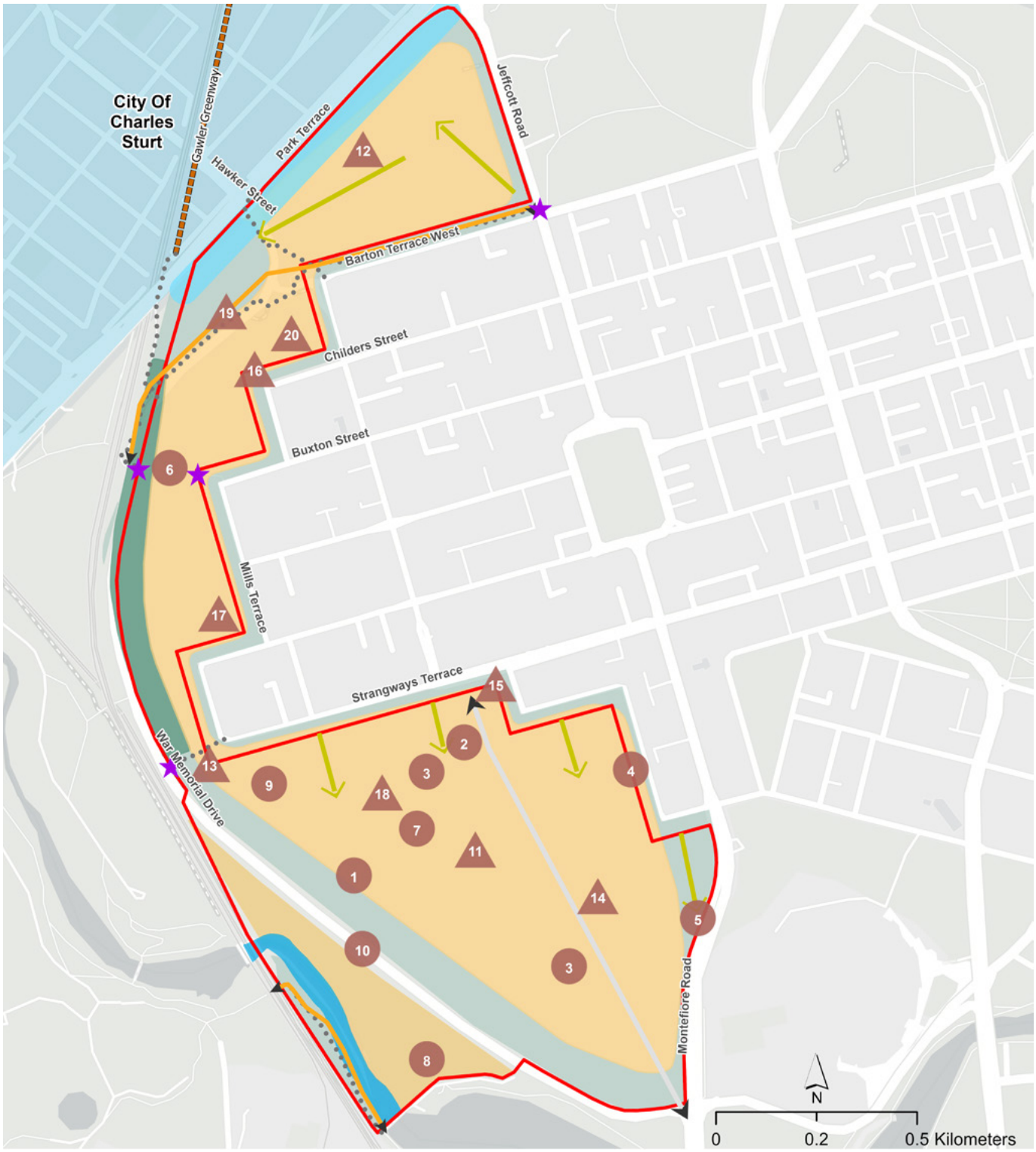
The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Moreton Bay Fig avenues
2. Oriental Plane avenue north-east of the golf course clubhouse
3. Italian Poplar avenues
4. Strangways Terrace olive grove dating from 1870s
5. Lemon-Scented Gum grove
6. North Course Ironbarks
7. Golf course use and layout
8. Pirltawardli Aboriginal area
9. Site of Colonial Iron Store
10. Manage car parking availability for park visitors including users of golf courses and tennis facilities

Future Considerations

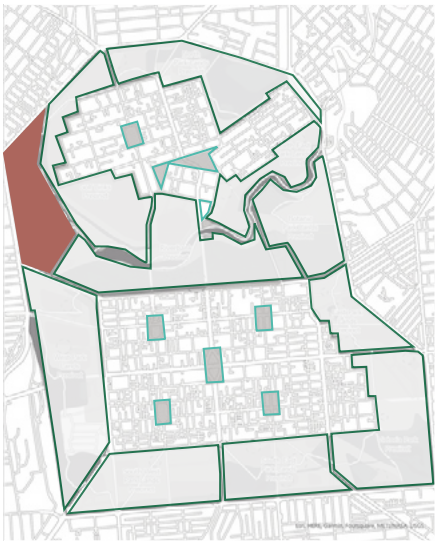
11. Undertake succession planting between the golf course fairways to strengthen ecosystem processes, improve biodiversity values, and increase visual amenity
12. Explore opportunities to naturalise the drainage line along Park Terrace to increase wildlife movement, and improve safety and appearance
13. Seek opportunities to heritage list, celebrate and interpret historic park features such as Strangways Terrace fence posts
14. Provide a promenade between Montefiore Hill and Hill Street linking to the North Adelaide Golf Course clubrooms
15. Investigate options to strengthen connection from Ward Street across the Golf Course to Bonython Park / Tulya Wardli (Park 27)
16. Connect Childers Street to the North Adelaide Railway Station, café and beyond to the community facilities in Bonython Park/Tulya Wardli (Park 27) and Bowden
17. Improve access and amenity to the community courts adjacent Mills Terrace
18. Support enhancement and increased usage of the North Adelaide Golf Links golf courses, clubhouse and supporting facilities to broaden opportunities for social activity and other sporting activities
19. Investigate an alternative Park Lands Purpose for all or part of the northern section of the North Adelaide Golf Course
20. Revegetate and enhance vegetation and understorey of the vegetated areas of the golf course.

Golf Links Precinct



Precinct Boundary
Existing Features
Future Considerations
Movement
Active Transport Connections
Adelaide Park Lands Trails
Shared Paths
Promenade
Bikeway
Landscape
Urban Address
Riparian
Sport and Recreation
Woodland / Grassland
Formal Park
Views + Vistas

Bonython Park Precinct



Precinct Snapshot

Parks included in Precinct

- Bonython Park/Tulya Wardli (Park 27)

Size of Precinct

59 hectares or 6.3% of the total area of Adelaide Park Lands

Tree Count and Canopy

37.4% canopy cover provided by 2,395 trees

Key Precinct Uses

- River Torrens (Karrawirra Pari), Torrens Lake, Torrens Weir
- Large open woodland areas and stands of trees of historic, botanical and aesthetic merit
- Event space for large music festivals, visiting circuses and many smaller community events
- Model boat pond, playspaces, picnic grounds, kiosk
- Learn to ride facility
- Contributory historic features such as exotic species, avenues and corridors
- Remnant vegetation
- Police Barracks
- Old Adelaide Gaol

Context

The Precinct occupies the area bordered by Park Terrace, Port Road, the Royal Adelaide Hospital Precinct, Montefiore Road, War Memorial Drive, Mildred Road and Barton Road.

Traditionally serving as a recreational space for both the wider metropolitan community and locals from the Cities of West Torrens and Charles Sturt, the Precinct boasts prominent natural features.

The surrounding road and rail infrastructure, as well as the River Torrens/Karrawirra Pari itself, pose accessibility challenges for many of the Park's attractions, particularly for nearby communities in North Adelaide, Thebarton, Hindmarsh, Brompton, and Bowden. This issue is particularly significant considering the limited availability of quality open spaces for these communities.

The Precinct serves the leisure and recreation needs of the community through the provision of facilities including three soccer pitches, two playgrounds, boating lake, Skate Park, the Adelaide Park Lands Trail and the River Torrens Linear Park path. It hosts a number of licence holders and is major and unique location for a range of community events.

Kaurna

The Park is known as Bonython Park/Tulya Wardli (Park 27), the Kaurna component of which loosely translates as 'blue gum place'. Tulya Wardli has significance as one of the many parks which comprise the Adelaide Park Lands as a place where the Kaurna people lived.

Along the Karrawirra Pari at a location called Pilta Wodli, the first then-named 'Native Location' or 'Aboriginal Location' was formally established and intended by colonial governments to concentrate local Aboriginal people in one place and provide education. Given the restriction to their way of life, Kaurna and Ngarrindjeri people did not cooperate. At this location, in 1845, children were separated from their parents and relocated, creating the first of the Stolen Generations. This location has strong cultural values to the Kaurna and South Australian Aboriginal communities.

The Precinct is culturally significant to Kaurna people, incorporating several elements that are relevant to heritage management planning, including:

- The physical status of the river, banks and environs including native vegetation, associated physical evidence (such as traditional burials and archaeological sites)
- Historic associations of the area as an important place of pre-colonial habitation, ceremony and hunting.

These factors make the Park equally important for the future as an ongoing part of Kaurna cultural life and relationship to their cultural landscape, and should be considered in management of the Park and project planning.

Historic Heritage

Bonython Park/Tulya Wardli (Park 27) consists of a highly modified landscape that experienced complete clearing during the initial years of colonial settlement. While the Park possesses general spatial integrity of the form devised by Colonel William Light in his Adelaide Park Lands and City Layout, it has been slowly reduced over time.

The olive plantation, Adelaide Gaol, Railway lines and marshalling yards reflect government infrastructure history that underpinned the development of the state.

Bonython Park/Tulya Wardli (Park 27) has historic significance and was the venue for cattle and sheep to be agisted, watered and grazed awaiting sale or slaughtering in the Slaughter House. Olives were also extensively planted, maintained and harvested by Adelaide Gaol prisoners.

The Olive Plantations are a significant manifestation of the horticultural advancement and vision of the emerging colony.

The Precinct contains State Heritage Places and important Kaurna and Historic Heritage archaeological features.

Landscape

Bonython Park Precinct is currently segregated into large areas of open space used for events, the playspace and surrounds, Old Adelaide Gaol and the river corridor.

Greater integration of spaces is achieved through Formal Parks, with increased activation to the north and connection with the Old Adelaide Gaol to the south.

Current movement is not well defined and access to some areas is problematic. Key connections can be investigated linking Karrawirra Pari to Port Road.

Improving the movement network and connections linking Thebarton to North Adelaide will be an ongoing priority.

Providing a greater number of flexible hubs, specifically rest nodes, will be an ongoing priority to serve the expanding City of West Torrens, City of Charles Sturt and Bowden Urban Village communities and activate the river edge and centre of the Precinct.

Drivers for Change

The Bonython Park Precinct will continue to see significant change driven by the state government's New Women's and Children's Hospital on the former Police Barracks site.

While expanding resident and worker populations in the inner western suburbs and North Adelaide provide a solid platform for reimagining the future of Bonython Park/Tulya Wardli (Park 27), it is the nature and scale of the development occurring in close proximity to the park that will play a major role in its ongoing activation.

The development of the new Women's and Children's Hospital, Bowden Urban Village, and the urban corridor along Port Road including the former West End Brewery site, will lead to a substantial increase in the number of people accessing areas adjacent to Bonython Park/Tulya Wardli (Park 27).

Creating appealing attractions and facilities that through collaboration between City of Adelaide, adjoining councils and the state government will be critical in facilitating greater use of the Precinct and providing valuable open spaces to these communities.

Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Sugar Gum plantation
2. Moreton Bay Fig, Hackberry and Lemon-Scented Gums
3. Olive Plantation A
4. Olive Plantation C
5. Olive Plantation Hedge
6. River Red Gum Grove
7. Sheoak grove
8. Ash plantation
9. Pre-European vegetation in biodiversity conservation area
10. Continue to support the restoration and rehabilitation of the River Torrens/Karrawirra Pari
11. Continue succession planting with River Red Gum and SA Blue Gum to replace willows and poplars
12. Bunyip Trail and woodland revegetation site
13. Manage Key Biodiversity Area #6 as a River Red Gum Woodland

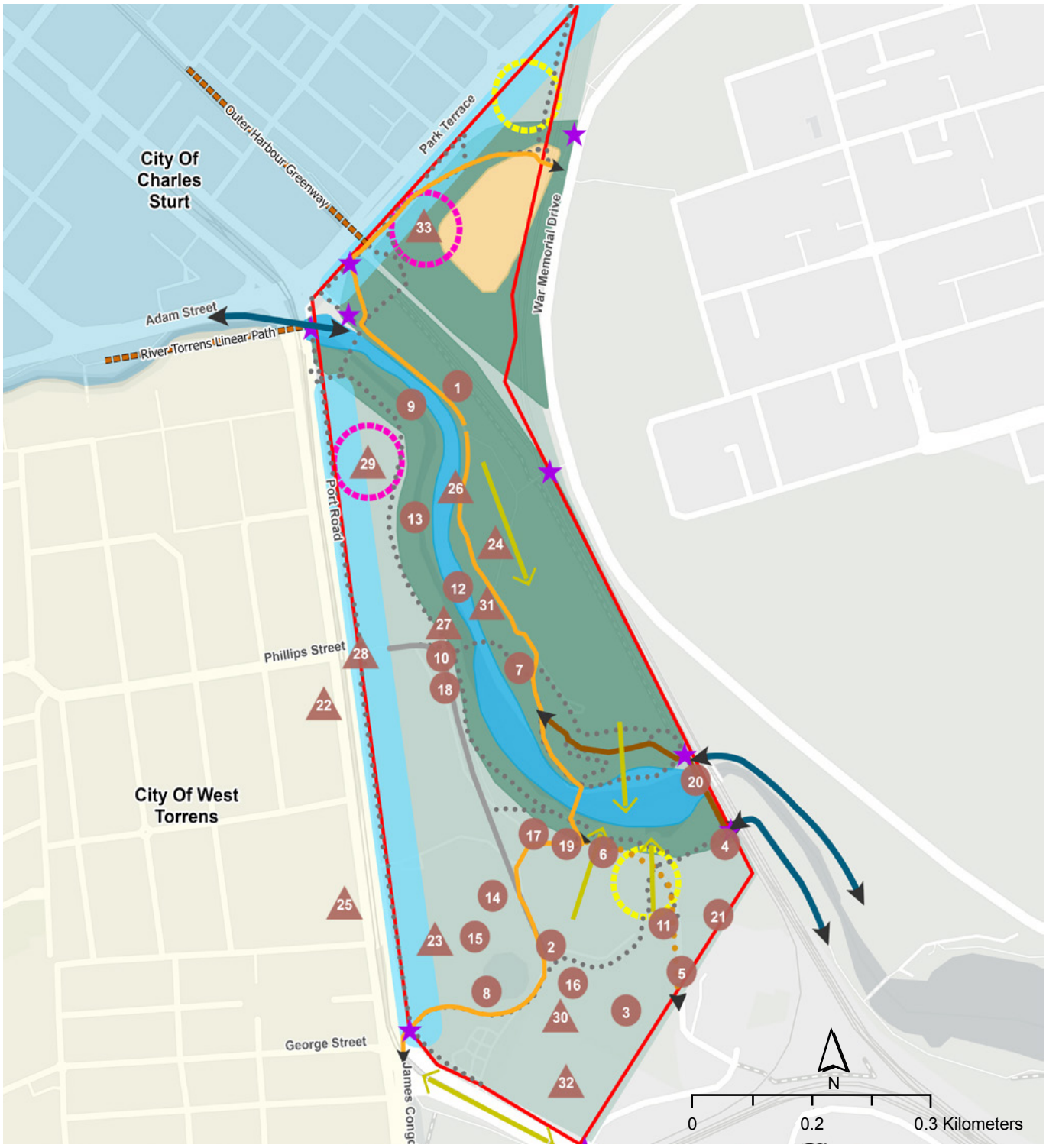
The Precinct includes locations of cultural and historic importance including

14. Slaughterhouse
15. Cattle Market
16. Slaughterhouse Manager's residence
17. Kaurna location (Bromley's Camp)
18. Buffalo Row
19. Coromandel Row
20. Railway bridge
21. Former powder magazine and Powder Keeper's cottage

Future Considerations

22. Encourage innovative water management practices and effective stormwater management including connections with City of West Torrens
23. Investigate the removal of the former netball courts and return to a Park Lands Purpose
24. Create a native grass meadow with selected local native species for biodiversity and seed production
25. Work with adjoining councils to provide effective walking and cycling connections through the Adelaide Park Lands
26. Reimagine the existing access road by providing a consistent road width and reducing hardstand where appropriate and maintaining cycling and walking connections
27. Provide walking trails and boardwalks along and over the river within a regenerated riparian environment
28. Provide pedestrian and bicycle priority at vehicle entry points into the park through improved signage and intersection design
29. Work with adjoining councils and community to plan and deliver a hub to respond to the population growth along Port Road
30. New contemporary play settings around the New Women's and Children's Hospital
31. Investigate consolidation of hardstand and buildings within the Precinct in consultation with stakeholders and adjoining councils

Bonython Park Precinct

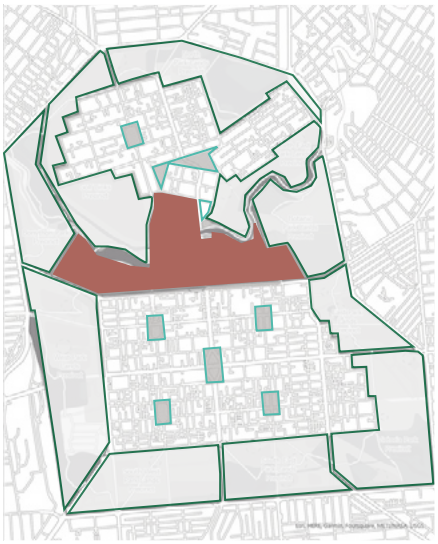


Precinct Boundary
Existing Features
Future Considerations
Movement
Active Transport Connections
Active Transport Paths
Adelaide Park Lands Trails
River Torrens Linear Park Trail
Potential Adelaide Park Lands Trail Realignment
Shared Paths
Access Road
Bikeway
Landscape
Existing Hub
Upgrade Existing Hub
Urban Address
Riparian
Sport and Recreation
Woodland / Grassland
Formal Park
Views + Vistas

32 Support the integration of the new Women's and Children's Hospital with the landscape.

33 Investigate upgrade or redevelopment of community buildings

Riverbank Precinct



Precinct Snapshot

Parks included in Precinct

- Part of Red Gum Park/Karrawirra (Park 12)
- Tarntanya Wama (Park 26)
- Part of Bonython Park/Tulya Wardli (Park 27)
- Frome Park/Nellie Raminyemmerin Park

Size of Precinct

132 hectares or 14% of the total area of Adelaide Park Lands

Tree Count and Canopy

19% tree canopy cover provided by 3,703 trees

Key Precinct Uses

- South Australian Parliament
- Adelaide Festival Centre
- Adelaide Railway Station
- Adelaide Convention Centre
- Elder Park
- Adelaide Oval
- Memorial Drive Tennis Centre
- South Australian Museum
- Migration Museum of South Australia
- Art Gallery of South Australia
- State Library of South Australia
- Health and medical research and services
- Adelaide Botanic High School
- Lot Fourteen
- Old Adelaide Gaol Police Barracks
- The University of Adelaide
- University of South Australia

Context

Occupying the area between Port Road in the west and Hackney Road in the east. The Riverbank Precinct is a strategically important part of the Adelaide Park Lands. Its location between the Central Business District and North Adelaide, and its accommodation of the River Torrens, Festival Centre and Parliament House, make it an important part of the lives of all South Australians.

The Riverbank Precinct is the subject of a major state government revitalisation initiative, which seeks to transform the Precinct into a mixed-use Precinct accommodating a host of health, research, cultural, entertainment, government, commercial, tourism, educational, recreational and sporting activities designed to activate the area and showcase its natural attributes.

Within the Riverbank Precinct the Government of South Australia has identified four distinct subzones, including:

- Health Subzone centred on the Royal Adelaide Hospital, South Australian Medical Research Institute (SAHMRI) and two world-class medical research centres developed by the University of Adelaide and University of South Australia.
- Entertainment Subzone features a redeveloped plaza area, with restaurants, cafés, water features, public artwork, seating, shelters and improved lighting, linking Elder Park and the Riverbank Footbridge to the Adelaide Railway Station and North Terrace.
- Cultural Institutions Subzone accommodates universities, Art Gallery of South Australia, South Australian Museum, Migration Museum and State Library.
- Innovation Subzone contains Lot Fourteen, Adelaide Botanic High School, and Frome Park Nellie Raminyemmerin Park.

For the purposes of this Strategy, the Riverbank Precinct occupies the area bordered by Montefiore Road, Pennington Terrace, King William Road and North Terrace. It includes most of the Health Subzone, the Entertainment Subzone, Cultural Institutions Subzone and Innovation Subzone. The central feature of the Precinct is the River Torrens/Karrawirra Pari, of significant cultural heritage value to Kaurna people and long recognised as a major focal point of the city's historical development.

Kaurna

There were traditional camps and burial grounds along both banks of the River Torrens/Karrawirra Pari and there is a high potential for burials or archaeological sites to be disturbed by landscaping and earthworks along both sides of the river. These traditional Kaurna camping and ceremonial areas, also used for firewood and construction timber, were heavily impacted by the growth of Adelaide. Red gum forests were rapidly transformed into bare grasslands.

Pingku (Pinky Flat) was an important traditional camp site with strong associations to the cultural power and significance of the River Torrens/Karrawirra Pari. It was a traditional ceremonial and corroboree grounds, before and after the establishment of the City of Adelaide.

There are highly significant cultural sites and associations in parts of the Precinct that are complex and confidential and cannot be reported or included in Park interpretation and signage or material.

Urban Landscape

The Urban Landscape is a highly modified landscape setting of the Adelaide Park Lands and is limited to the southern side of the Riverbank Precinct. The Urban Landscape consists of urban features including significant built form, plaza spaces, promenade connections and some areas of natural elements that provide for a Formal Park setting. It offers a high quality public realm and supports opportunities for events of various sizes.

Drivers for Change

The Riverbank Precinct is at the centre of a major state government initiative to revitalise the area including the development of the new Women's and Children's Hospital, continued development of Lot Fourteen and the revitalisation of Festival Plaza. Higher education is also a focus of this area including the new Flinders University Campus in Festival Plaza and merged Adelaide University.

These developments, as well as those envisaged in the future, will see a substantial increase in the number of people (locals and visitors) accessing and using the Riverbank Precinct for a diverse range of social, recreational, sporting, entertainment, commercial and government activities. Ensuring that people can safely and conveniently access and enjoy the various attractions on offer, while strengthening the visual connection to and showcasing the environmental importance of the river's natural attributes, will be critical in facilitating the sustainable use of the Precinct.

Tarntanya Wama (Park 26)

A reimagined river frontage, incorporating a series of activity hubs on its northern and southern banks, will enable people to interact with the river and engage in many different on and off water activities.

Opportunities to develop wetlands to improve water quality and increase people's engagement with and understanding of the importance of the river ecosystem will also be explored. The hubs will offer a range of facilities and attractions for local people and visitors to the Precinct, including play opportunities, interpretive trails, boardwalks and well-provisioned viewing areas, encouraging longer stays during the day and night.

A new, centrally located shared-use path extending from the Botanic Garden in the east through to Bonython Park/Tulya Wardli (Park 27) in the west will seamlessly connect these activity hubs and provide additional links to shaded paths running north-south between North Adelaide and North Terrace.

To the north, an enhanced interface along Pennington Terrace will draw people into a hub established around Adelaide Oval. Improved access between Pennington Terrace and the Adelaide Oval will also be created to improve accessibility to Adelaide Oval and to encourage greater use of its northern park setting.

To the south, an extended frontage along North Terrace between the new Royal Adelaide Hospital and Kintore Avenue in the east will activate the southern edge of the Precinct by providing safe and convenient crossings to a re-designed Festival Plaza, supported by a host of restaurants/cafés and retail outlets. The frontage to North Terrace will also allow for the development of transitional spaces into the Central Business District, highlighting the connectivity between the Riverbank with the business and tourist districts of the city centre.

East-west connections from the Precinct into Tulya Wardli, the new Royal Adelaide Hospital and the Old Adelaide Gaol will be upgraded and will include lighting to illuminate the bridge structures and other

prominent features of the built environment as well as increase the safety of the path connections. The River Torrens Linear Path will also be improved to link the riverfront with areas further east and west. Identifying ways to improve connection between the new Royal Adelaide Hospital and the River will be investigated.

Lot Fourteen

Lot Fourteen is a growing innovation district which targets sectors with an emphasis on technology-enabling and creative industries.

The opportunity exists to create a new and exciting environment at Lot Fourteen including contributing public space to the Adelaide Park Lands and transforming adjacent areas. New development within the Precinct should be integrated into the Adelaide Botanic Garden, Adelaide Riverbank and the Adelaide Park Lands more broadly.

The Lot Fourteen site should be planned and managed to optimise the open space, community and cultural benefits generated by the diverse community and cultural attractions and events across the broader North Terrace and East End precincts. Identifying opportunities to celebrate Aboriginal and Torres Strait Island culture will contribute to sharing this area with a range of audiences. Overall, plans for the site should maximise the land returned to flexible community open space.

Innovative adaptive reuse of heritage buildings will maximise their contribution to the economic viability of the site and the East End as a whole.

Frome Park/Nellie Raminyemmerin Park, located north of Lot Fourteen, provides opportunities for general and informal recreation and landscaping should continue to complement that of the Adelaide Botanic Gardens and Botanic Park. The remaining significant sight line from the Barr Smith Library of the University of Adelaide through this park to the Botanic Garden should be maintained.

Strategic Priorities

Master plans have been developed for much of the Precinct and strategic moves include to

1. Deliver the Riverbank Master Plan
2. Deliver the Lot Fourteen Master Plan

Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

3. War Memorial Oak
4. Remnant White Cedar pathway
5. Moreton Bay Figs
6. River Red Gums
7. Pennington Gardens West
8. Creswell Gardens
9. Stella Bowen Park
10. Elder Park and Elder Park Rotunda
11. Light's Vision
12. Statue of Hercules
13. Memorial to Captain Ross Smith
14. Cultural sites in the Precinct are protected under the *Aboriginal Heritage Act 1988*
15. Due to cultural associations, interpretation of Red Kangaroo Rock site should not be included in Park signage or material

16 Maintain and seek to strengthen sight line from Frome Park/Nellie Raminyemmerin Park

17 Riverbank Precinct Footbridge

18 Barr Smith Walk

19 Fireman Gardener's Memorial Fountain

20 Pennington Gardens Fountain

21 Reedman Memorial Drinking Fountain

22 Creswell Garden Sign

23 Sir Donald Bradman statue

24 Artworks and sculptures

25 Aboriginal and Torres Strait Islander Memorial

26 Vietnam War Memorial

27 Pioneer Women's Memorial Garden

Future Considerations

28 Create open woodland north of Oval No. 2

29 Improve water quality and biodiversity of the River Torrens/Karrawirra Pari and incorporate opportunities to engage with the river

30 Consider the impact of any re-landscaping or earthworks on any culturally significant site

31 Reinforce perimeter planting along War Memorial Drive, Pennington Terrace and Montefiore Road

32 Enhance interface along Pennington Terrace to draw people into Tarntanya Wama (Park 26)

33 Restrict the existing roadway to its current width and alignment and exclude any new buildings from Oval No. 2

34 Improve connectivity and accessibility to other Precincts and Central Business District

35 Deliver a Master Plan for Helen Mayo Park/Tulya Wardli (Park 27C)

36 Investigate potential return of the state government car park in Helen Mayo Park/Tulya Wardli (Park 27C) to Park Lands Purpose

37 Reimagine the river frontage to enable greater interaction with the river and encourage diverse activities and tourism

38 Retain a mix of formal and informal recreational use of the River Torrens Karrawirra Pari and provide related infrastructure

39 Provide for informal recreation, including the River Torrens Linear Trail

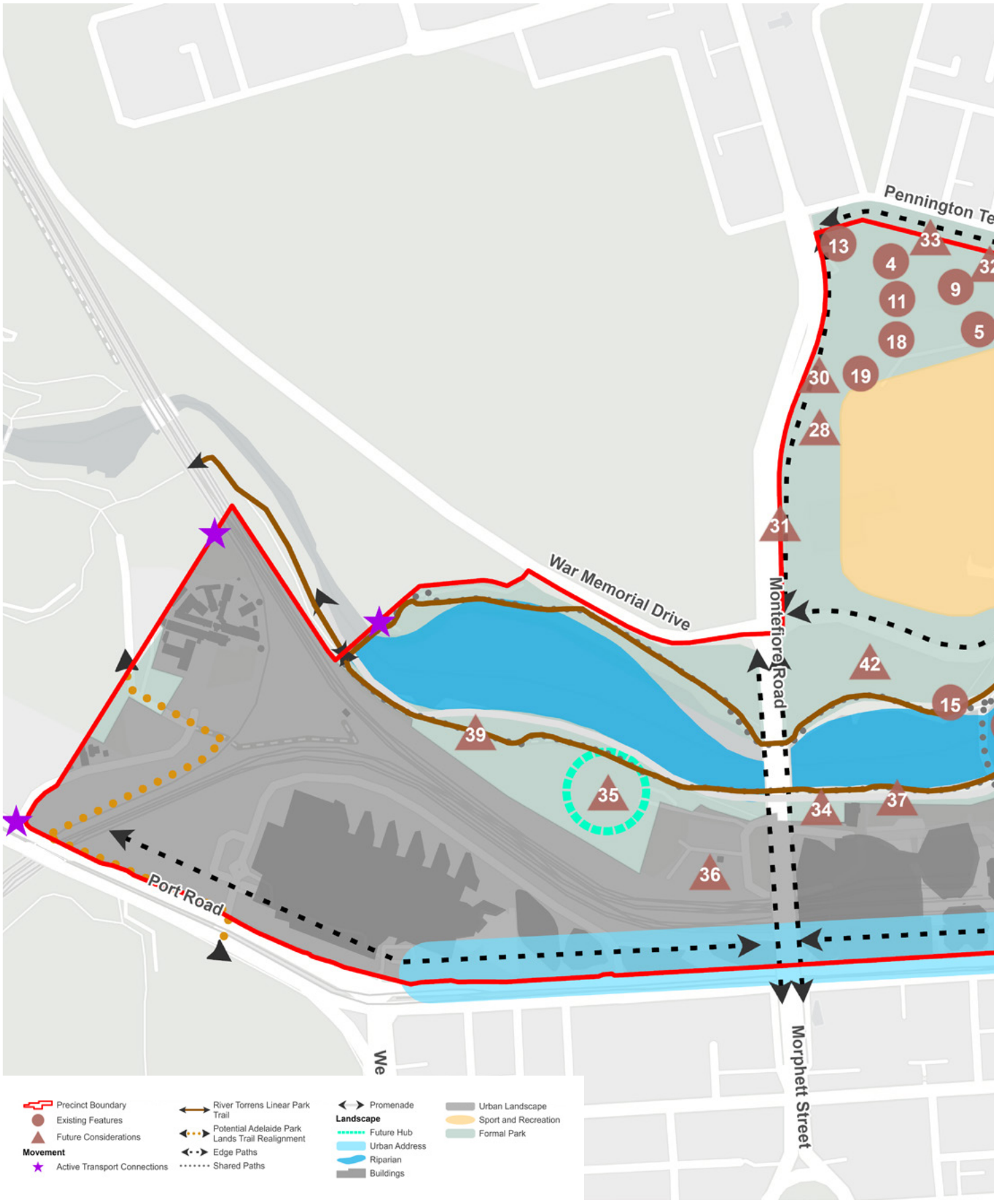
40 Provide public facilities, furniture and amenities to support activities and events held in Tarntanya Wama (Park 26)

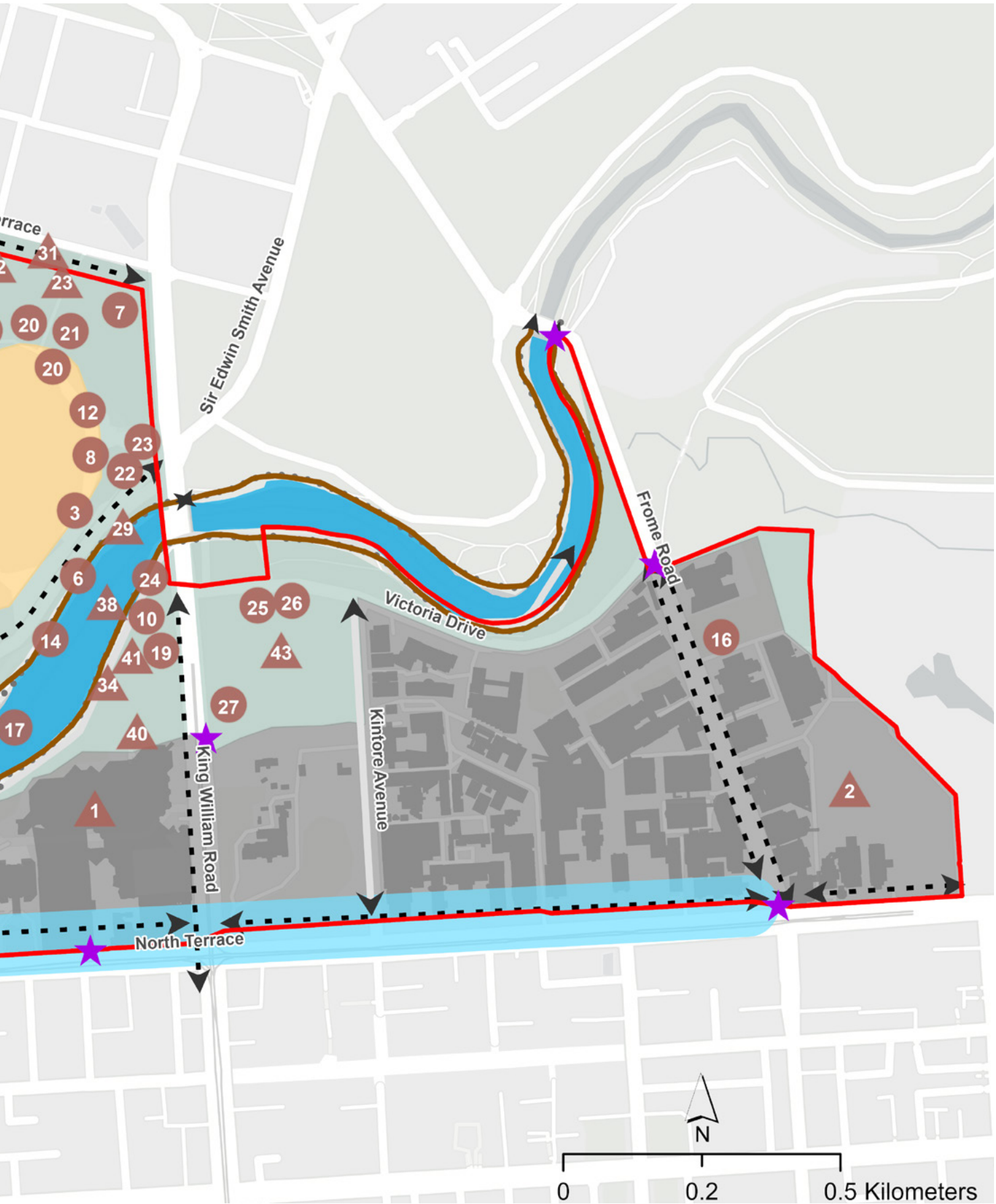
41 Retain Elder Park as a major event venue for temporary community cultural and sporting events

42 Provide shade tree plantings to define the Pingku (Pinky Flat) space

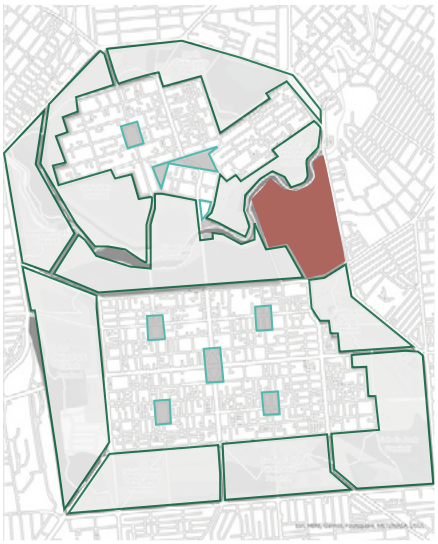
43 Investigate opportunities to increase public use of the Torrens Parade Ground

Riverbank Precinct




Sir Edwin Smith Avenue
Frome Road
Victoria Drive
Kintore Avenue
King William Road
North Terrace
N
0
0.2
0.5 Kilometers

Botanic Estate Lands and Adelaide Zoo Precinct



Precinct Snapshot

Size of Precinct
71.8 hectares or 7.7% of the total area of the Adelaide Park Lands

Parks included in Precinct
Mistletoe Park/Tainmuntilla (Park 11)

Tree Count and Canopy
45.9% canopy cover provided by 5,900 trees

Key Precinct Uses
- Adelaide Zoo
- Adelaide Botanic Garden
- Botanic Park
- National Wine Centre
- State Heritage Places including the Goodman Building, Tram Barn, Bicentennial Conservatory, North Lodge, East Lodge, Palm House, Simpson Kiosk, Museum of Economic Botany, former Asylum Medical Officer's Residence
- Grey-headed Flying fox colony in Botanic Park
- Contributory historic and cultural features such as exotic and native species, avenues and corridors
- First Creek Managed Aquifer Recovery and Storage System and Main Lake/Kainka Wirra

Context

Comprised of several state government managed areas, the Botanic Estate Lands and Adelaide Zoo Precinct includes the Adelaide Zoo, Adelaide Botanic Garden, Botanic Park and National Wine Centre.

As a major drawcard for tourists and visitors to Adelaide, the Precinct experiences the highest rates of visitation of all the Adelaide Park Lands with the Adelaide Zoo, Adelaide Botanic Garden and National Wine Centre scoring highly on overall levels of satisfaction amongst visitors. While it is important to sustain and build on the quality of experiences available, it is equally important to apply a 'light touch' to any future development within the Precinct to maintain and ensure its ongoing popularity as a special place within the Adelaide Park Lands.

Kaurna
The Botanic Creek waterway and particularly the waterhole that is now the Main Lake Adelaide Botanic Garden/Kainka Wirra were important for Kaurna people. Kainka Wirra was the main waterhole of Parnatatya 'King Rodney,' one of the leading Kaurna men of the Adelaide Plains, as told by his daughter Iparrityi.

The areas within the Adelaide Zoo, Adelaide Botanic Garden, Botanic Park and surrounds were culturally significant to Kaurna people and were used for burials, camping, ceremonies and other activities

Drivers for Change

The delivery of the Adelaide Botanic Garden Master Plan, Botanic Park Management Plan and Zoos Master Plan are key initiatives generating change in the Precinct.

Adelaide Botanic Garden

The Adelaide Botanic Garden Masterplan 2021 was developed with a deep understanding of the role of botanic garden in contemporary society and the site's natural topography, its structure and heritage and its management by the Board of the Botanic Gardens and State Herbarium appointed by the Minister, under the *Botanic Gardens and State Herbarium Act (2024)* and Regulations (2021).

The Adelaide Botanic Garden and State Herbarium offer a range of education opportunities for students and teachers of all ages. This allows for discovery about plants, culture, science and connecting to nature to contribute to health and wellbeing.

Key initiatives in the Masterplan include:

- The Main Lake/Simpson Kiosk precinct upgrade
- North Lodge and East Lodge heritage restoration and activation projects
- Classgrounds and Simpson Shade House upgraded
- Bicentennial Conservatory restored and renovated
- International Rose Garden upgrade to World Federation of Rose Societies Garden of Excellence status
- Managed aquifer storage and recovery system enhancements
- Continued improvements to the new Eastern Entrance through the Outback Garden
- Kitchen Garden extended
- Niobe Hill precinct upgrades
- New themed and interpreted rare and endangered seed production garden
- North Terrace entrance entry and precinct
- Francis Arbor building upgrade providing new entrance to the site
- Sustainable long-term waterways management
- Visitor experience and facilities infrastructure upgraded
- Key living collections expanded and enhanced including local provenance species.

The details of the 110 priority actions arising from the Adelaide Botanic Garden Masterplan 2021 can be read at Adelaide Botanic Garden Masterplan.

Botanic Park

Botanic Park was gazetted as a botanic estate under the care and control of the state in 1855 and is one of four botanic estates managed by the Board of the Botanic Gardens and State Herbarium under the *Botanic Gardens and State Herbarium Act (2024)* and Regulations (2021). Aspects of future priorities for Botanic Park are included in the Adelaide Botanic Garden Masterplan 2021, a Botanic Park Management Plan (2002) and Botanic Park Event Vegetation Management Plan (2002).

Botanic Park contains a state significant living tree collection, displayed in an arboretum landscape. It also has a River Torrens/Karrawirra Pari frontage which is the focus of an ongoing project to revegetate with local provenance species. The park is a popular recreation facility for family gatherings and the venue for significant major outdoor events, such as WOMADelaide, which now utilise all areas of the park. The site is an integral part of the operations of the Adelaide Botanic Garden. Botanic Park is more recently the location of the Grey-headed Flying-fox colony in Adelaide, and future activation concepts under consideration include the creation of 'Botanic Loop', a high treetop level walk to enable visitors to learn about the importance of the work of the Botanic Garden and the threatened flying-fox.



Adelaide Zoo Precinct

Adelaide Zoo opened to the public on 23 May 1883, making it the second oldest zoo in Australia. Since that time, many generations of South Australians have passed through its gates. Adelaide Zoo has retained many original and significant architectural, heritage and botanical features, giving it a style and character of its own. This city-based zoo occupies eight hectares of the Adelaide Park Lands and is home to more than 250 species of exotic and native animals. In 2015, a 20-year master plan was developed for Adelaide Zoo (Zoos SA Master Plan 2015–2035), with a mid-term review and addendum developed in 2023 (Adelaide Zoo Master Plan Addendum 2023). The master plan is focused on developments reflective of a vibrant city oasis showcasing life's diversity, and offering visitors an accessible, intimate and rich experience that complement the offerings of the adjacent Riverbank Precinct.

Strategic Priorities

Master Plans have been developed for much of the Precinct and strategic moves include to

1. Deliver the Zoos South Australia Master Plan
2. Deliver the Adelaide Botanic Garden Master Plan
3. Deliver the Botanic Park Management Plan

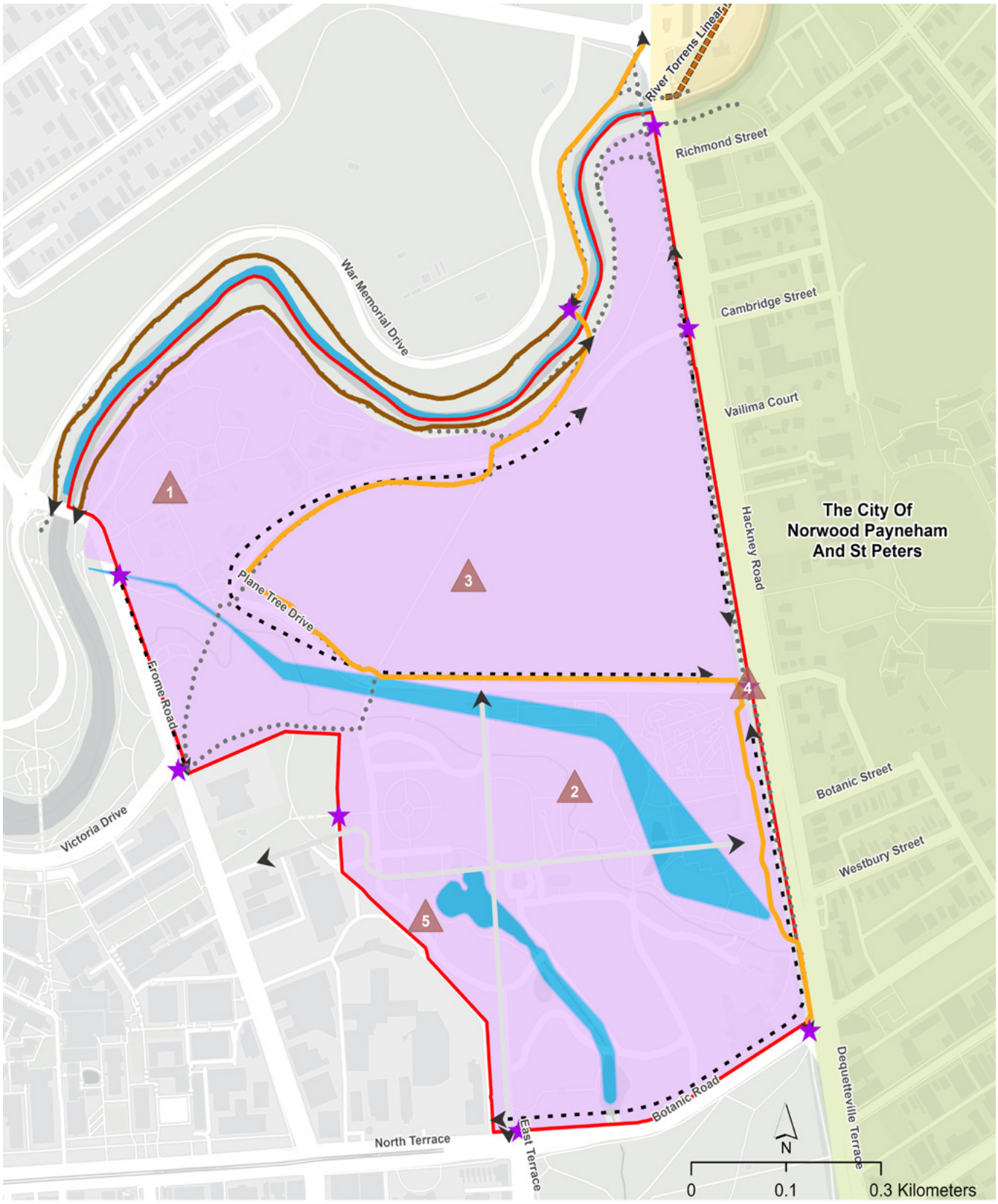
Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

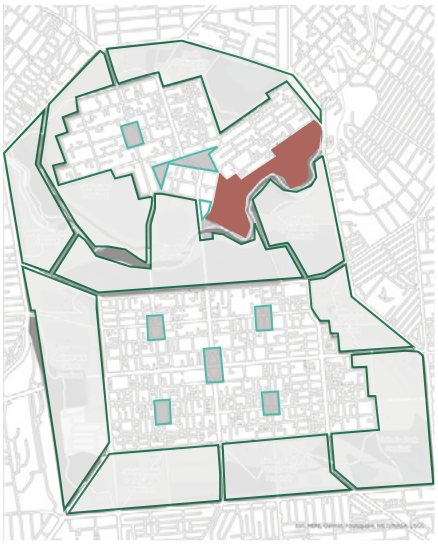
4. Assess options to increase safe crossing across Hackney Road to the Botanic Garden and Botanic Park for walkers, cyclists and users of mobility aids, and for an increase in public transport connections
5. Deliver the proposed Adelaide Botanic Garden and Lot Fourteen interface projects to enhance and add value to the eastern end of the North Terrace cultural boulevard.



Botanic Estate Lands and Adelaide Zoo Precinct



North-East Park Lands Precinct



Precinct Snapshot

Parks included in Precinct

- Bundey's Paddock/Tidlangga (Park 9)
- Bullrush Park/Warnpangga (Park 10)
- Mistletoe Park/Tainmuntilla (Park 11)
- Red Gum Park/Karrawirra (Park 12)

Size of Precinct

36 hectares or 3.9% of the total area of the Adelaide Park Lands

Tree Count and Canopy

23% canopy cover provided by 1,149 trees

Key Precinct Uses

- Significant sports ovals used by licensees
- Lower North Adelaide Playground
- Petanque piste
- Archery field
- Grass tennis courts
- City of Adelaide Nursery
- Key Biodiversity Area
- Contributory historic features such as exotic species, avenues and corridors
- Remnant vegetation

Context

The North-East Park Lands occupy the area between King William Road and Sir Edwin Smith Avenue to the west, Finniss Street and MacKinnon Parade to the north, Mann and Hackney Roads to the east and the River Torrens/Karrawirra Pari to the south. This Precinct contains sporting grounds held under licence by the University of Adelaide and a number of popular recreational facilities, including the Lower North Adelaide Playground, Peace Park, a semi-ornamental areas, petanque piste and archery field.

Kaurna

River Torrens/Karrawirra Pari flows through the Precinct which provided an important source of food, and a place to meet and camp. Red Gum Park/ Karrawirra (Park 12) has been a significant meeting site for Aboriginal peoples including, in recent times, meetings related to Reconciliation and Native Title.

Historic Heritage

Overall, the Precinct retains the original shape and form of the Parks as devised by Colonel William Light.

From the 1850s to the late 1870s areas of the Precinct were used for grazing, fire wood collection, and agistment.

Tree planting that aligns with the general spatial and species intent of Brown's treatise on South Australian tree culture (1880) including pathway alignments are still evident through the Precinct.

Landscape

While Bundey's Paddock/Tidlangga (Park 9), Bullrush Park/Warnpangga (Park 10) and Red Gum Park/ Karrawirra (Park 12) have a predominantly structured recreational and sporting character, Mistletoe Park/ Tainmuntilla (Park 11) is characterised by a semi-natural landscape containing important areas of remnant vegetation and sites of significant restoration and revegetation.

Bundey's Paddock/Tidlangga (Park 9) and Bullrush Park/Warnpangga (Park 10) are characterised as structured and maintained sports grounds.

Mistletoe Park/Tainmuntilla (Park 11) contains an identified Key Biodiversity Area.

Minor connections and edge paths are already well established within the Precinct.

A defined river pathway connection along the river front would provide an improved connection to the River Torrens/Karrawirra Pari.

Drivers for Change

As sporting activities continue to expand in the Precinct there is likely to be further demands for facilities such as clubrooms to support these uses.

Care will be needed to ensure facilities do not adversely affect residential areas in North Adelaide and that they are available for broader community use outside formal sporting times.

While adjacent residential areas in North Adelaide house a relatively stable population, an intensification of development in the Town of Walkerville will see more people accessing the Precinct from the east to participate in the variety of recreational and sporting activities.

Lot Fourteen and Adelaide Botanic High School are likely to attract more people into the North-East Park Lands. Ensuring that there are safe connections through to this Precinct from these developments and from Melbourne Street will be a key driver.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

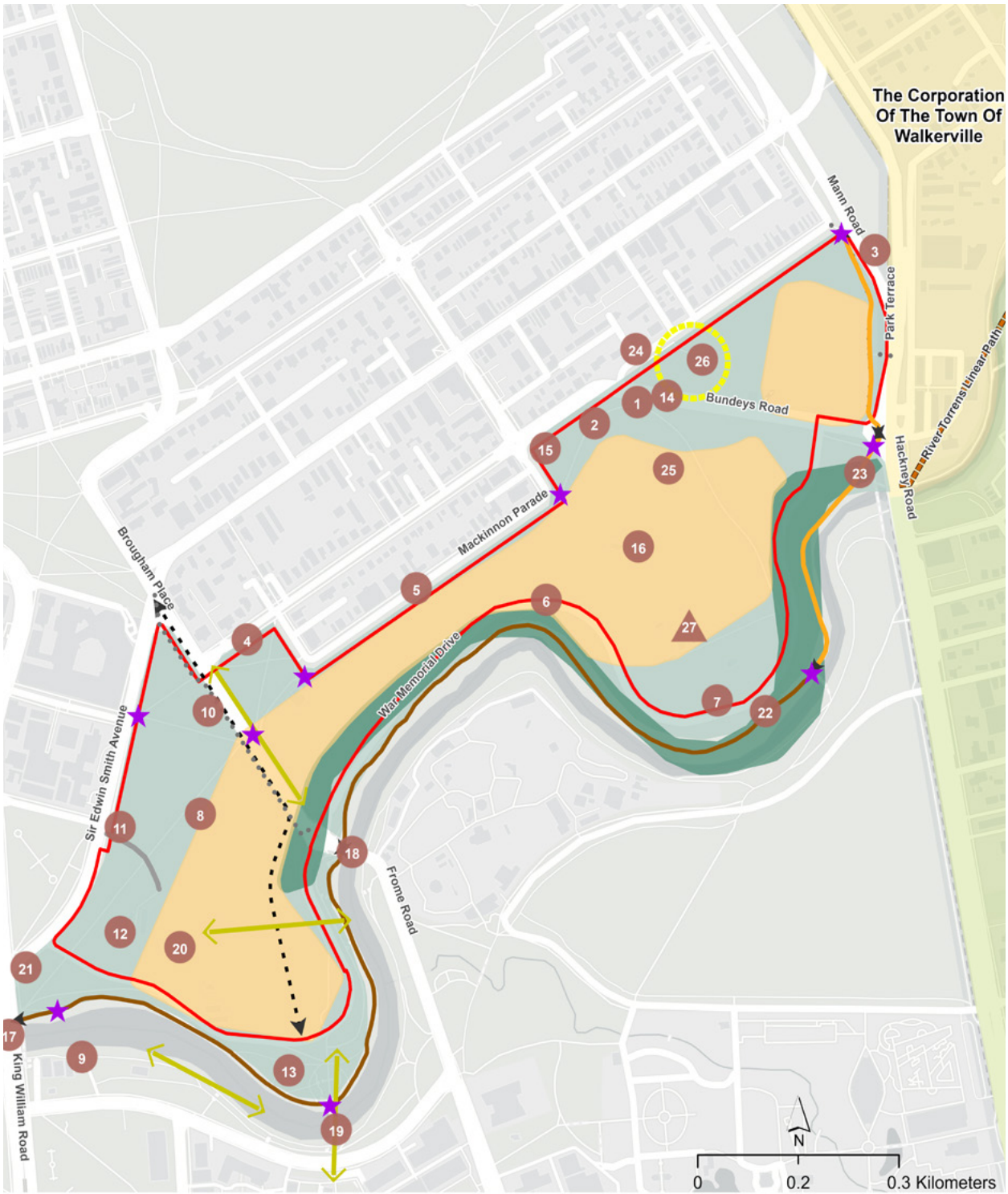
The Precinct contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Aleppo Pine and River Red Gum grove of trees
2. English Elm plantation
3. Group plantation of Sugar Gum, Moort, Melaleuca spp., Weeping Bottlebrush, and She Oak
4. English Elm Grove
5. River Red Gum plantation
6. Key Biodiversity Area
7. Sculptures and picnic area within River Torrens/ Karrawirra Pari banks
8. Drainage swale north of Adelaide University Oval
9. River Torrens/Karrawirra Pari Watercourse and lake
10. Aleppo Pine row located on the southern flank of MacKinnon Parade
11. Moreton Bay Fig grove located on side of Sir Edwin Smith Avenue
12. Kei Apple hedge behind the University of Adelaide 'pavilion'
13. Remnant McEwin Arboretum trees
14. Two gate posts and series of eight fence posts on MacKinnon Parade
15. Lower North Adelaide War Memorial
16. Former Teachers Training College Grandstand
17. Adelaide Bridge over the River Torrens/ Karrawirra Pari
18. Albert Bridge over the River Torrens/ Karrawirra Pari
19. The University of Adelaide Footbridge
20. University of Adelaide Grandstand, War Memorial Drive, North Adelaide
21. Memorial to G.F. Angas and J.H. Angas
22. Manage Key Biodiversity Area #5 as a River Red Gum Woodland
23. Stormwater detention basin and urban address
24. Manage car parking availability in MacKinnon Parade to ensure availability for users of park facilities
25. Maintain running and fitness loops and associated facilities
26. Manage courts for community use and further enhance the hub

Future Considerations

27. Work with community and licence holders to develop a master plan to address future community, sport and recreation needs

North-East Park Lands Precinct



Precinct Boundary
Existing Features
Future Considerations

Movement
Active Transport Connections
Adelaide Park Lands Trails
River Torrens Linear Park Trail
Edge Paths
Shared Paths
Access Road
Bikeway

Landscape
Existing Hub
Sport and Recreation
Woodland / Grassland
Formal Park
Views + Vistas

Adelaide Squares and Gardens

The city's Squares and Gardens are a highly valued element of the city's fabric and its distinctive heritage-listed layout. In order to optimise their value to the South Australian and local resident community, it is important that the Squares and Gardens are enhanced in ways that better serve a growing and increasingly diverse city community.

To that end, the following sections put forward a series of planning considerations for the Squares and Gardens that are designed to enhance their attractiveness to a wide cross-section of the resident, worker and visitor populations and, as a result, to increase their use.

In time, the Squares and Gardens will be master planned to determine the appropriate level of infrastructure and enable an integrated and coordinated approach to their future enhancement.

Movement within each Square and Garden is generally well defined via pathways. Vehicle movements are generally to the perimeter of Squares with some roads bisecting the Squares into segments.

Where practical, return of road to Squares to align with the National Heritage Values is desirable.

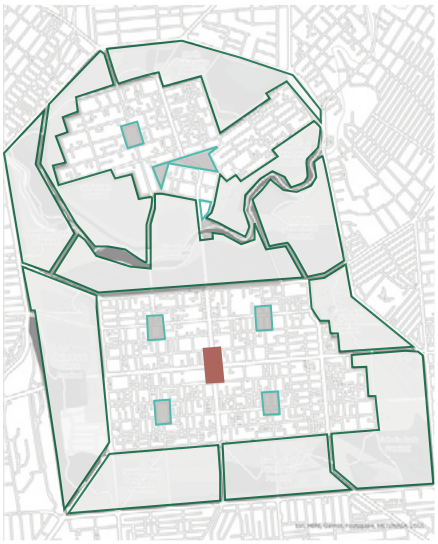
Each Square and Garden is considered a hub due to their attraction for residents and visitors as green open space within the city.



Adelaide Squares and Gardens



Victoria Square/Tarntanyangga



Precinct Snapshot

Size
2.94 hectares

Tree Count
18% tree canopy cover provided by 174 trees

Key Precinct Uses
- Major event spaces
- John Dowie's 'Three Rivers' fountain
- Australian Aboriginal Flag
- Australian National Flag
- Queen Victoria Statue
- John McDouall Stuart Statue
- Captain Charles Sturt Statue
- Charles Cameron Kingston Statue
- Public toilet
- Desert Ash Corridor
- Ngaru mularta/Chalk Sticks
- Victoria Square/Tarntanyangga Fountain

Context

Victoria Square/Tarntanyangga is the geographic and civic centre of the city and regarded as one of its great public places.

The first stage of the Victoria Square/Tarntanyangga Master Plan has reinforced its status as Adelaide's premier gathering place and venue for a diverse range of local, national and international events.

The second stage of the Master Plan will enhance connections between the Square and the Adelaide Central Market, activate its western and eastern edges and provide for a more appealing and versatile public space.

Kaurna
Victoria Square/Tarntanyangga is of high cultural, spiritual and physical significance to the Kaurna people and to the wider Aboriginal community.

Victoria Square/Tarntanyangga has special associations as the central camp and traditional meeting place of the Tarntanyangga Clan of Kaurna community and for Aboriginal visitors.

The Square is linked to Tarnda Kanya, the Red Kangaroo rock site on the south side of the River Torrens/Karrawirra Pari, a highly significant cultural heritage site concerned with this Creation Ancestor. From the 1960s Victoria Square/Tarntanyangga became a focus for Aboriginal activities. These activities included its role as a central meeting place for Aboriginal people from all over Australia, becoming a social and gathering point outside the central Police Station (now the Commonwealth Law Courts building) and Court House.

Victoria Square/Tarntanyangga is where the National Aboriginal Flag (the red, black and yellow Aboriginal flag) designed by Harold Thomas, was flown for the first time anywhere on National Aboriginal and Islander Day on 9 July 1971. It now flies permanently alongside the Australian flag on one of the two tall flagpoles in the centre of the Square.

Historic Heritage

Victoria Square/Tarntanyangga was created in Colonel William Light's Adelaide Park Lands and City Layout of 1836 resulting in an area of approximately now six hectares, including a park and roadway, comprising the Square. The design incorporated a central square to function as Adelaide's focal point and provide open space for recreational activities. On his first map, Light called the Precinct 'The Great Square'. It was eventually named in honour of Princess Victoria before her accession in 1837.

Light surveyed the Square as a rectangle on a north-south axis and sketched an approximate internal spatial configuration of two rectangular park areas with a rectangular encircling an east-west movement system. This spatial configuration remained from 1864 until 1883 when King William Street was constructed north-south through the Square, with the Queen Victoria statue being unveiled in its present location in 1894.

The Square was a dusty, treeless paddock until 1854, when the City of Adelaide embarked on a planting program, constructed four broad diagonal pedestrian paths and erected a wooden fence. Other work on the Square included construction of an east-west roadway that created two garden areas. A fountain was also considered, but it took 100 years for this idea to come to fruition.

By 1883, plans were underway to extend King William Street directly through Victoria Square/Tarntanyangga, dividing it into four garden areas. The original wooden fence was replaced by ornate iron railings which were relocated to the University of Adelaide. A statue of Queen Victoria, who had ascended to the throne in June 1837, was erected in the centre of the Square in 1894. The layout remained unchanged until 1967 when the Square assumed its present diamond form Landscape design remodelling works again transpired in 1945–46 and 1966.

Landscape

Victoria Square/Tarntanyangga reflects the staged implementation of the Victoria Square/Tarntanyangga Master Plan. Open turf spaces are regularly renewed following impacts from major events and festivals.

Drivers for Change

Master Plan recommendations are the primary drivers of change although the steady diversification of uses surrounding the Square, including more residential development and the establishment of local and international education providers, is seeing its increased use. Residential development in the King William Street area is projected to continue to grow and house almost 20% of city growth to 2036. The Square's proximity to the Adelaide Central Market, one of the city's most treasured facility, creates opportunities for Victoria Square/Tarntanyangga to improve access to the Adelaide Central Market precinct and to host a program of events and activities that will attract people to the locality with benefits to local retailers and businesses.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands planning considerations.

Existing Features

The Square contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. John Dowie's 'Three Rivers' fountain
2. Australian Aboriginal Flag
3. Australian National Flag
4. Queen Victoria Statue
5. John McDouall Stuart Statue
6. Captain Charles Sturt Statue
7. Charles Cameron Kingston Statue
8. Public toilet
9. Desert Ash Corridor
10. Ngaru mularta|Chalk Sticks
11. Victoria Square/Tarntanyangga Fountain

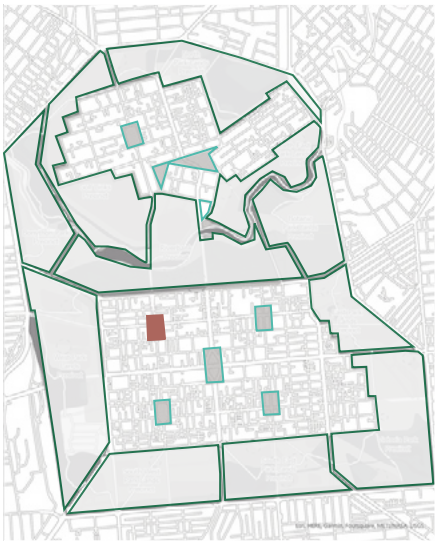
Future Considerations

12. Improve connections to the Adelaide Central Market Precinct and facilitate opportunities for Adelaide Central Market events to occur in the Square
13. Establish two new promenades in the south of the Square to connect with the central plaza existing northern promenades
14. Realign the surrounding roads to create a consolidated Square
15. Create an active interface to the eastern edge
16. Provide opportunities for events in the south of the Square including celebrations of Kaurna culture

Victoria Square/Tarntanyangga



Light Square/Wauwi



Precinct Snapshot

Size
1.56 hectares

Tree Count
27% tree canopy cover provided by 191 trees

Key Precinct Uses
- Colonel Light Monument and Grave
- Artworks
  - 'The Eternal Question' Richard Tipping
  - 'Knot' Bert Flugelman
  - 'Catherine Helen Spence' – Ieva Pocuis
- Pride Walk

Context

Despite having some 55,000 vehicles travelling through and around the Square each day, Light Square/Wauwi provides high quality open spaces catering for major events through to small community gatherings. The Square features a range of distinctive mature tree species, important public art installations and the State Heritage Place Colonel William Light's Grave and monument, the area is surrounded by a range of uses including health, education, entertainment, accommodation and the arts and supports day and night-time economy.

Kaurna
The Square served as the main community meeting place for Aboriginal and Torres Strait Islander peoples, including local Kaurna Miyurna and neighbouring Narungga and Ngarrindjeri peoples from the 1900s where people socialised, shared stories and organised rallies and protests. Wauwi was named to commemorate the wife of Kadlitpina. Wauwi is the Kaurna name for female Kangaroo.

Historic Heritage
Light Square/Wauwi was named after Colonel William Light, the first Surveyor-General of Adelaide, responsible for its planning and layout. When he died in 1839, he was buried in the Square. Over his grave there now stands a memorial in the form of a marble column surmounted by the representation of a surveyor's theodolite.

Landscape
The original layout was compromised in 1910 when Currie Street was cut through the Square.
The Square is now split into two parts and consists of a large southern rectangle and a small northern semi-circle.

In 1983 council embarked on an improvement program of Light Square/Wauwi and a redesign plan was developed and later implemented. The program included the undergrounding of power lines, the widening of footpaths around the perimeter, planting of extra street trees, and elms around the perimeter, work on the memorial, construction and landscaping

of the southern median strips and the northern quadrant, incorporation of the Catherine Helen Spence Statue and the resurfacing of all internal footpaths.

Improving walking and cycling connections to, through and from the Square will encourage local residents and workers to adopt more active travel options, while increasing the safety of crossings to the northern section of the Square from the adjacent Arts SA and TAFE sites is a priority.

Drivers for Change

There has been a substantial increase in the number and diversity of residents living in and around Light Square/Wauwi in recent years, providing a strong platform to reimagine the character and benefits of the Square. Light Square/Wauwi will continue to support a growing population in the city's north-west, which could house 8% of the city's residents to 2036. As population and density increase the importance of this green space will grow. Along with residential development, the area will change through an increase in higher education, health and medical uses.

The capacity for Light Square/Wauwi to meet the diverse needs of users provides the opportunity to transform the Square to better connect to its surrounding uses and River Torrens/Karrawirra Pari and support community wellbeing. A master plan is being developed to guide investment and partnerships and aims to rebalance the public space for greening, cooling, biodiversity, events and activities and to create a safer, inclusive and welcoming environment for people to meet, stay, walk, wheel and cycle.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands planning considerations.

Existing Features

The Square contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Indian Coral Tree
2. Carob
3. Swamp Sheoak
4. Morton Bay Fig
5. Hills Weeping Fig
6. Italian Poplar Avenue
7. Irish Strawberry
8. Chinese Elm Avenue
9. Golden Ash
10. Colonel William Light Grave and Monument
11. The Eternal Question sculpture by Richard Tipping
12. Knot sculpture by Bert Flugelman
13. Catherine Helen Spence sculpture by Ieva Pocuis
14. Pride Walk

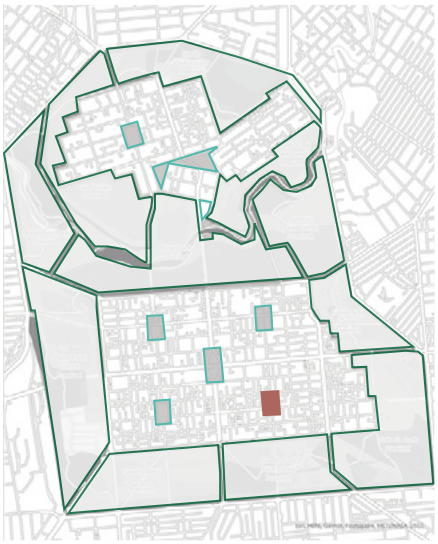
Future Considerations

15. Support opportunities to improve the connection of the Square with the Adelaide Park Lands
16. Minimise parking around the Square
17. Through master planning seek opportunities to reconfigure the surrounding roads and improve safety, active transport, and crossing points, reduce traffic impacts and identify any opportunities to return Adelaide Park Lands Roads to Park Lands Purpose
18. Define the unique character of the Square and create flexible spaces for gathering and events
19. Improve amenity by increasing greening for cooling and biodiversity and to contribute to health and wellbeing
20. Consider opportunities for play within the Square through universal landscape design such as surrounding public art and water feature.
21. Improve comfort throughout the seasons and resilience to climate change through increased tree canopy and passive design principles.
22. Interpret and reflect a diversity of cultures including Kaurna and Historic Heritage.

Light Square/Wauwi



Hurtle Square/Tangkaira



Precinct Snapshot

Size
1.83 hectares

Tree Count
27% tree canopy cover provided by 434 trees

Key Precinct Uses
- Artworks
    - The Forest of Dreams – Anton Hart
    - Ceramic Birdbath – Stephen Bowers
    - Hurtle Square sign and plinth

Context

Located within the south-east of the city, Hurtle Square/Tangkaira is surrounded by predominantly residential uses yet experiences low visitation. Hurtle Square/Tangkaira is heavily dominated by through-traffic running north-south along Pulteney Street and east-west along Halifax Street.

The impact of this traffic adds to the disconnection between residents and workers and the open space offerings of the Square, despite its formal garden character and magnificent trees.

Kaurna
The Precinct has also been referred to as 'Memory Square' by Kaurna people. It was a central meeting place for Indigenous peoples from the 1920s and 1960s but not as popular as Victoria Square/Tarntanyangga, Light Square/Wauwi or Whitmore Square/Iparrityi due to higher number of Aboriginal residents in the west end of Adelaide.

Tangkaira was named to commemorate the wife of Ityamai-itpina, Tangkaira or 'Charlotte, from the Clare District'.

Historic Heritage
Hurtle Square/Tangkari was named after Sir James Hurtle Fisher, the first Resident Commissioner and pioneer founder of the colony of South Australia. The South Australian Commissioners appointed Fisher to organise the local constitution. In 1837, Fisher saved the Adelaide Park Lands from land speculators. Fisher was elected the first Lord Mayor of the City of Adelaide (1840–1842).

Landscape
The original layout for the Square was compromised in 1909 when electric tram tracks were laid, dividing the Square into its current four quadrants.

Hurtle Square/Tangkaira has been a focus for public art, with the inclusion of a pigeon fountain and 'The Forest of Dreams' art installation.

Drivers for Change

As the south-east sector of the city continues to grow its resident population, the potential for Hurtle Square to host community events and provide more contemplative spaces away from a heavily trafficked environment will increase. Providing amenities, improved access to the Square and attractive vistas into and out of the Square will be essential if this potential is to be realised.



Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands planning considerations.

Existing Features

The Square contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Captain Cook Pines
2. Desert Ash Lines
3. Pepper Trees
4. Morton Bay Figs
5. The Forest of Dreams artwork by Anton Hart
6. Untitled sculpture by Stephen Bowers
7. Hurtle Square sign and plinth

Future Considerations

8. Reimagine the east, west and southern perimeter roads to manage car parking and deliver pedestrian spaces
9. Investigate treatments to the Halifax Street intersection to better integrate it into the Square and visually connect the northern and southern areas
10. Provide opportunities along the northern edge to encourage activation and connection with surrounding commercial activities
11. Support opportunities to improve the connection of the Square with the Adelaide Park Lands
12. Minimise parking around the Square
13. Consider the inclusion of local play opportunities including water play and climbable artworks
14. Develop a master plan for the Square including a strategy for succession planting, investigate opportunities to reconfigure the surrounding roads and identify opportunities to return Adelaide Park Lands roads to Park Lands Purpose.

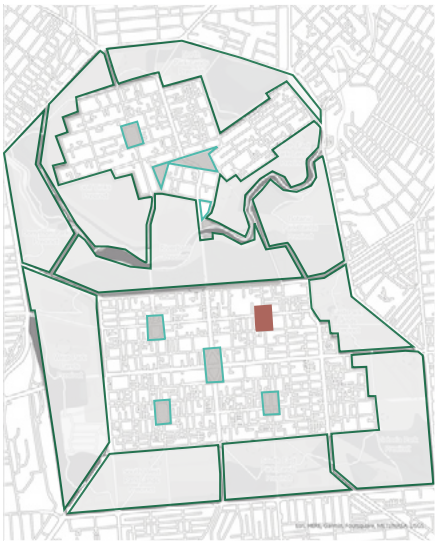




Hurtle Square/Tangkaira



Hindmarsh Square/Mukata



Precinct Snapshot

Size
1.4 hectares

Tree Count
29% tree canopy cover provided by 201 trees

Key Precinct Uses
- Untitled – Paul Trappe Statue
- Hindmarsh Square/Mukata Playspace

Context

Surrounded and bisected by wide roadways which effectively cut the Square into four discrete sections, Hindmarsh Square/Mukata is dominated by 125 car parks that encircle the southern sections of the Square. Nonetheless the Square offers a beautiful gardenesque and cultural heritage landscape featuring large Moreton Bay Figs, Jacaranda tree planted in memory of Margaret Tobin, Hackberry, Silky Oaks, Captain Cook Pines, Golden Ashes and Desert Ashes. The addition of the Hindmarsh Square/Mukata Playspace and Paul Trappe Statue have enhanced the usability of the Square and broadened its appeal to residents, workers and visitors to the city.

Kaurna
History held by members of the Aboriginal community indicate that the Precinct was an important meeting place for Aboriginal Elders prior to colonisation.

Mukata was King John's wife, a prominent member of the Kaurna community.

Historic Heritage
Anecdotal evidence suggests this is the most heavily-used Square reflecting its proximity to Rundle Mall, the East End and surrounding office buildings. The original layout of the Square has changed. When established by Light, the Square was one large grassed area, curved to the north to accommodate the tram and the roads. It is now comprised of four quadrants divided by Grenfell and Pulteney Streets.

Landscape
The Hindmarsh Square/Mukata Master Plan commenced implementation with removal and replacement of trees as part of the upgrade of Pulteney Street, and removal of the toilet and gardeners' facility. Since then, the Hindmarsh Square Playspace has been installed with subsequent landscaping of the north-west quadrant, and landscaping of the north-east quadrant.

Drivers for Change

The Hindmarsh area will continue to see mixed-use growth. Hindmarsh Square/Mukata is well placed to contribute to the significant surrounding green space of the Eastern Adelaide Park Lands and Adelaide Botanic Gardens while being uniquely positioned to provide a green refuge for visitors to Rundle Street and Rundle Mall and neighbouring workers and residents.

Through future master planning, the investigations into the narrowing of roadways and a reduction in car parking and prioritising pedestrian access would help the interface of the Square with surrounding land uses and provide a more enticing environment for people.



Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

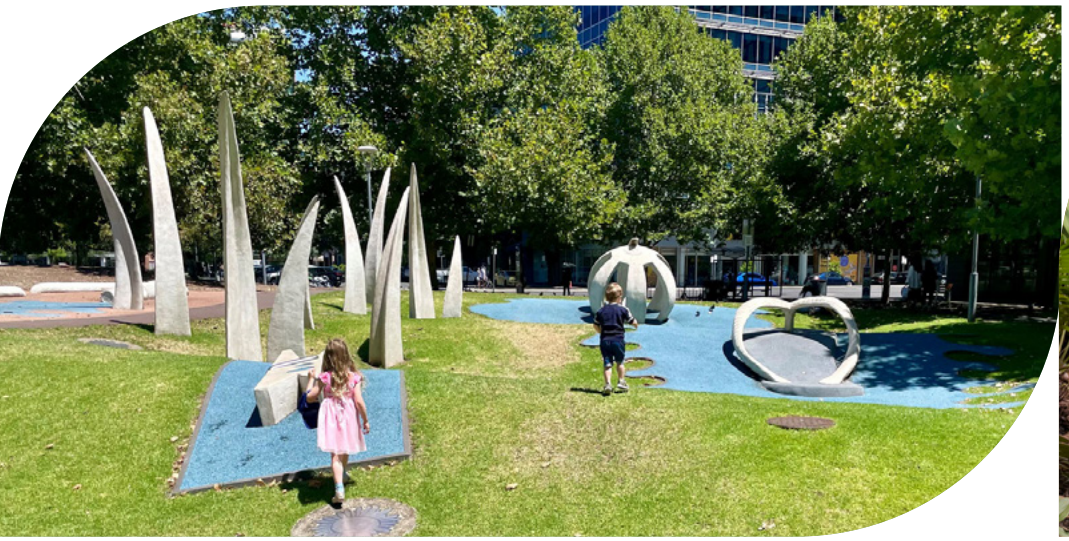
Existing Features

The Square contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Moreton Bay Figs
2. Row of Hackberries
3. Group of Silky Oaks in north-eastern quadrant
4. Captain Cook Pine
5. Desert Ash Avenues
6. Untitled sculpture by Paul Trappe
7. Hindmarsh Square/Mukata Playspace

Future Considerations

8. Reduce or remove car parking to the eastern and western edges
9. Consider more structure to the park including tree planting, seating and shelter
10. Support opportunities to integrate adjoining uses and businesses to add vibrancy and improve urban environment
11. Develop a strategy for succession planting and investigate opportunities to reconfigure the surrounding roads and identify any opportunities to return Adelaide Park Lands roads to a Park Lands Purpose
12. Explore upgrading to services to accommodate a range of small and medium-sized events.

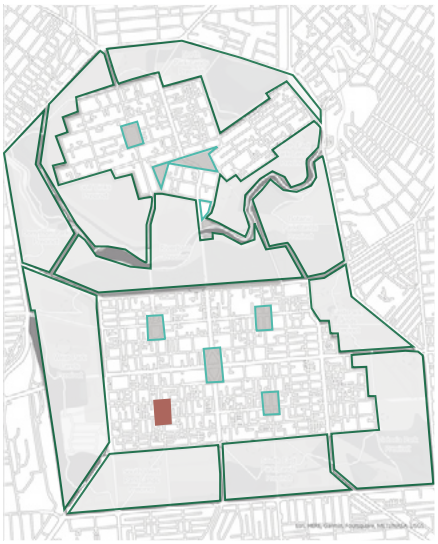




Hindmarsh Square/Mukata



Whitmore Square/Iparrityi



Precinct Snapshot

Size
2.05 hectares

Tree Count
26% tree canopy cover provided by 305 trees

Key Precinct Uses
- Artworks
- Community spaces
- Community basketball court and table tennis table

Context

Nestled within the south-west of the city, Whitmore Square/Iparrityi has traditionally served the open space needs of the community. Characterised by a gardenesque landscape containing magnificent trees including Moreton Bay Figs, Arizona Cypresses, Pepper Trees, Desert Ashes, Camphor Laurels and Holm Oaks, Whitmore Square/Iparrityi has been identified as a place providing a range of play opportunities for local residents.

Amenities such as the table tennis tables and 3-on-3 basketball courts have reinforced the role of the Square as an important focal point for active play, local events and community gatherings for the south-west city community.

The Whitmore Square/Iparrityi Master Plan establishes a high-level vision for the future of the Square, and a plan for improvements to achieve that vision. The Master Plan is a framework for planning and design that will:
- Help to guide future works
- Help the public visualise the Square's potential
- Enable the City of Adelaide to plan and implement staged improvements.

Delivery of the Master Plan will be progressed over a number of years through asset renewal and succession planting.

Kaurna
In 2003 the Square was renamed Whitmore Square/Iparrityi to honour Iparrityi, a Kaurna ancestor born in the 1840s and recognise its significance as a meeting place for Aboriginal peoples, particularly in the 1930–1940s.

Ipparrityi was a principal female Kaurna informant, sharing her knowledge about Kaurna culture and language including place names and important sites throughout Adelaide. Iparrityi died in 1929 and is referred to as 'the last woman of the Adelaide Tribe'.

Historic Heritage

Whitmore Square/Iparrityi was named after Mr William Woolryche Whitmore, one of the Colonisation Commissioners for South Australia and a member of the House of Commons. The original layout of the Square has remained remarkably intact from when first laid out in Colonel William Light's Plan. The only changes are the reduced angles of the corners of the Square, leaving some small traffic islands.

Landscape

The Square provides a large open space, surrounded by mature exotic trees and is well used by residents. The Square has also become a focus for public art initiatives in the city, including the Shaun Kirby sculpture 'Voyagers'.

Drivers for Change

As the resident population in the south-west sector of the city is forecast to grow there is a significant opportunity to build on the range of facilities available in the Square to enhance its role as a place that the local community values. Its accessibility to the Adelaide Central Market adds to the Square's appeal as a dynamic open space catering for an increasingly diverse population.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

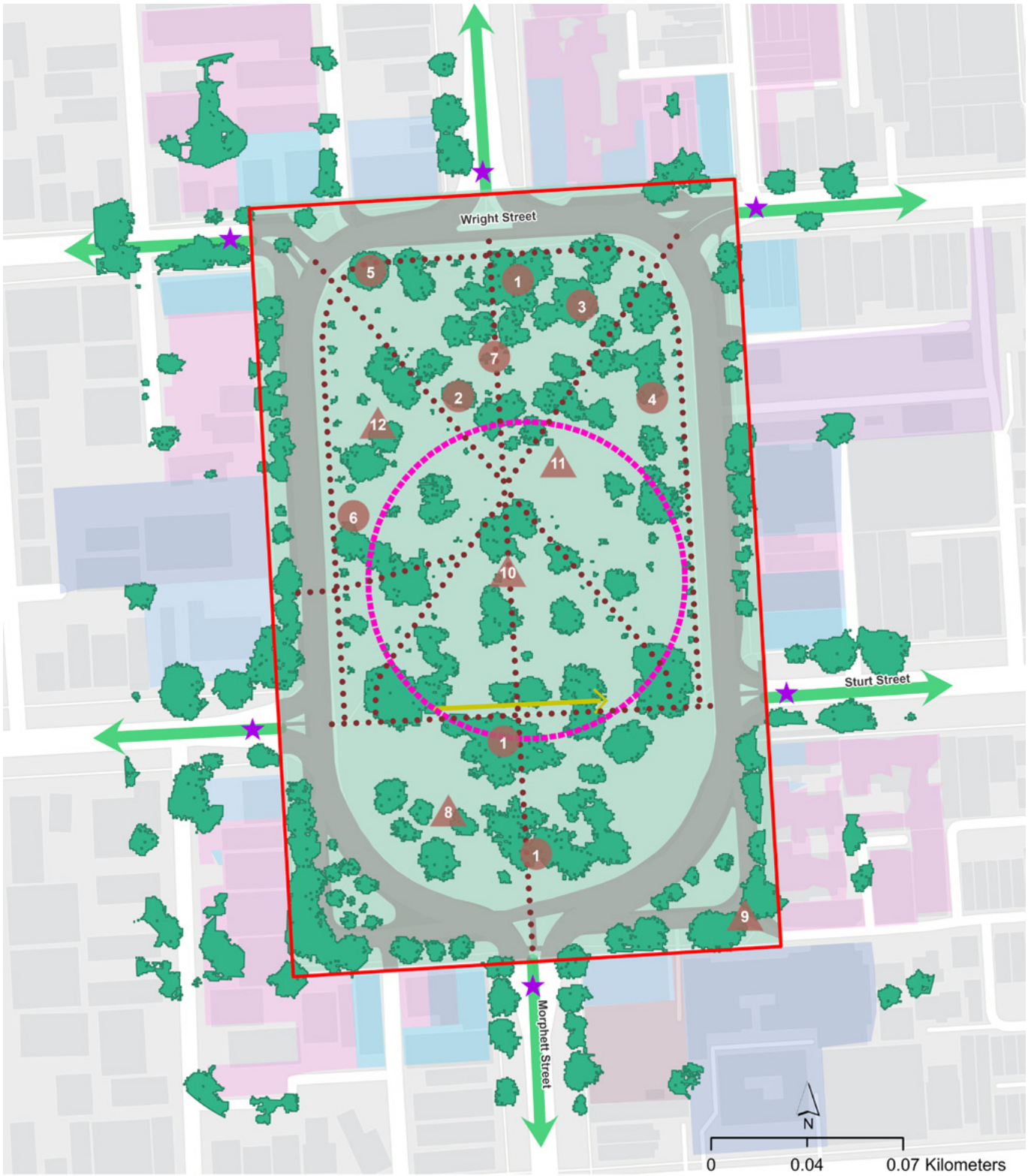
The Square contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Moreton Bay Figs
2. Arizona Cypresses
3. Pepper Tree Avenue
4. Desert Ash Lines
5. Holm Oak
6. Voyagers artwork by Shaun Kirby
7. John Ednie Brown Memorial

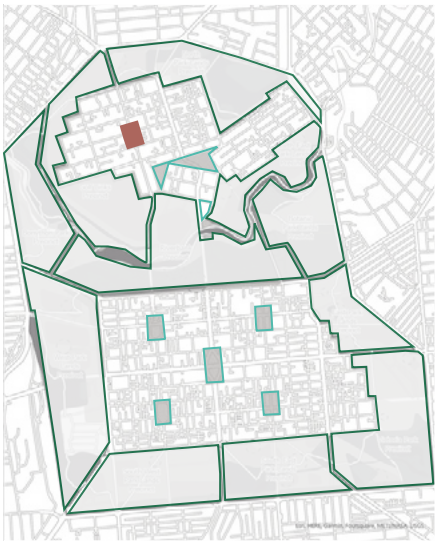
Future Considerations

8. Provide new path networks that are located as part of a master planning exercise that considers broader movement patterns and any changes to road alignments and vehicle movements
9. Reduce bitumen in and around the Square and integrate possible services or transport systems
10. Consider a central promenade that addresses key movement patterns across the Square and provides a central spine from which the Square's spatial arrangements can be developed
11. Expand on the community basketball court and table tennis to create a hub which may include a central plaza and additional opportunities for community activities, including children's play
12. Consider more structure to the park and the creation of outdoor rooms including tree planting, seating and shelter.

Whitmore Square/Iparrityi



Wellington Square/Kudnartu



Precinct Snapshot

Size
2.74 hectares

Tree Count
29% tree canopy cover provided by 276 trees

Key Precinct Uses
- Gardens

Context

As a key focal point for the residents and workers of North Adelaide, Wellington Square/Kudnartu has been identified as providing opportunities for additional play and nature play elements as well as more contemplative spaces for the community.

Kaurna
Knowledge held by members of the Kaurna community indicates that the Precinct used to connect what is now the golf course, as part of a travelling and hunting area used by Aboriginal peoples.

The Kaurna name for the Square commemorates Kudnartu, a Kaurna woman from the Crystal Brook area in the northern-most region of Kaurna country.

Her marriage in 1848 to Thomas Adams, a shepherd, was the first official marriage between a settler and an Aboriginal person in South Australia. She became known as Mary Anne Adams.

Historic Heritage
Wellington Square/Kudnartu has Historic Heritage significance as an integral part of the Adelaide Park Lands and City Layout, and it is also the only Square located in North Adelaide. The spatial arrangement and plantings are substantially the same as when the city was laid out by Colonel William Light in 1836. The Square was named after Field Marshal the Duke of Wellington, who recommended the appointment of Light. The layout of the Square (according to the Smith Survey of the 1880s) has altered little since it was established, with the same path pattern and style of Victorian tree plantings.

Landscape
Featuring a range of exotic and native tree species set within an open, semi-natural and gardenesque landscape, Wellington Square/Kudnartu displays a distinct 'village green' character complemented by highly structured plantings and pathway alignments.

Drivers for Change

Wellington Square/Kudnartu will increasingly become a place for communities to engage in a diverse range of recreational activities.

Improving pedestrian connectivity and safer crossing points should be the main focus whilst retaining the Square's historical layout of pathways and continuing to provide a high quality formal garden landscape.


YOU ARE AT:
Wellington Square / Kudnartu
Adelaide Aquatic Centre
11 min
O'Connell Street
6 min
Lefevre Terrace
12 min
Walk Adelaide
CITY OF ADELAIDE
Adelaide Park Lands

Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

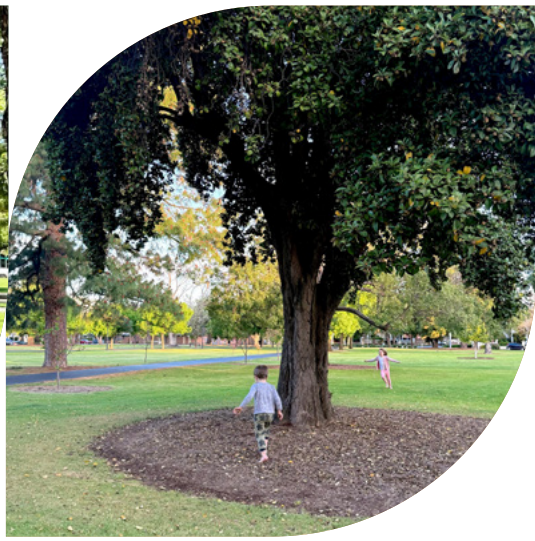
The Square contains cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Kurrajongs
2. Arizona Cypress
3. Canary Island Pine
4. Carob
5. Elms
6. Bluestone kerbing and bollards

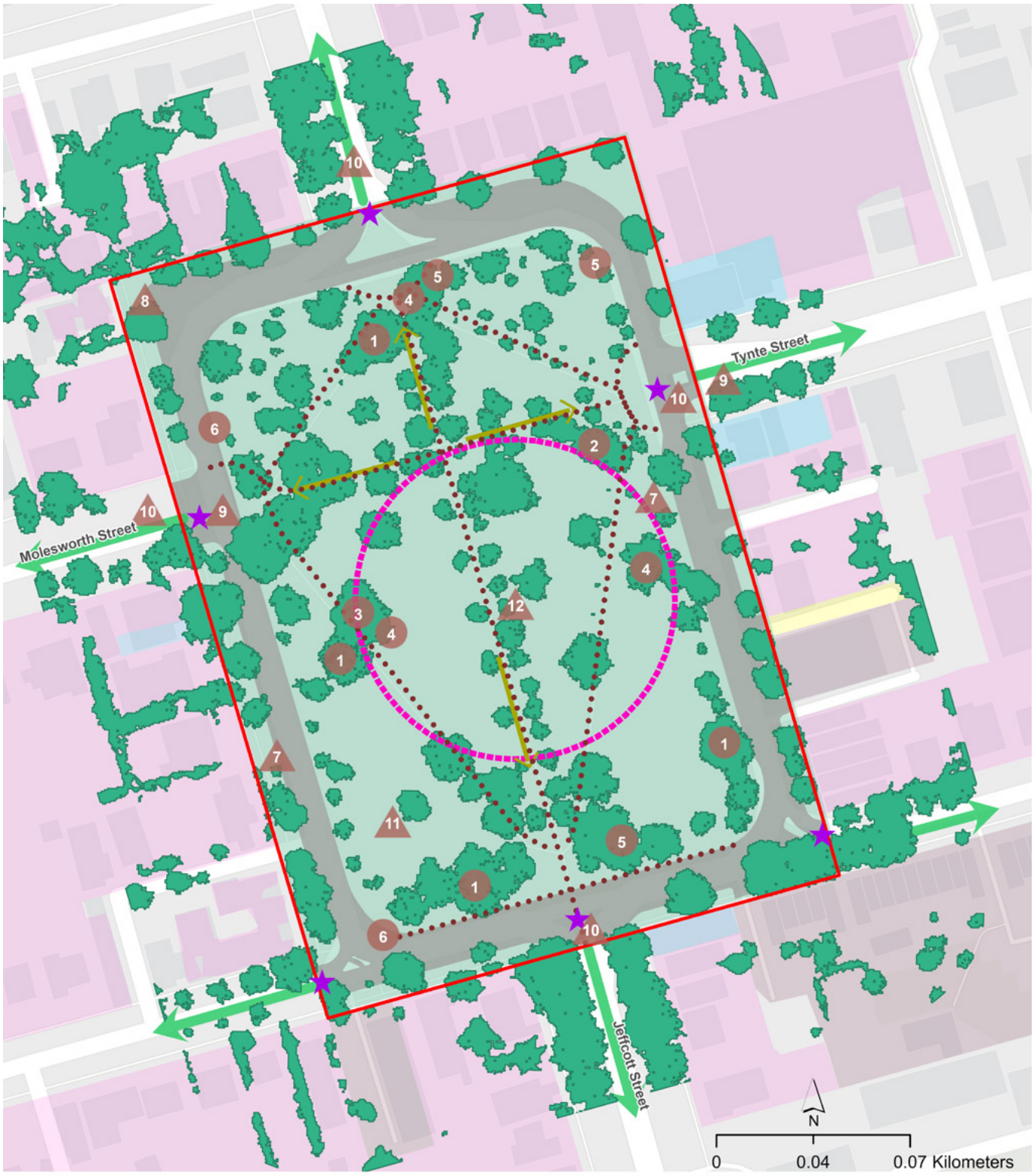
Future Considerations

7. Minimise parking around the Square
8. Seek opportunities to reduce bitumen in the Square
9. Investigate traffic changes, pedestrian crossings and road surface treatments to improve pedestrian and cycle connections
10. Support opportunities to improve the connection of the Square with the Adelaide Park Lands
11. Provide play opportunities for local residents
12. Create more structured outdoor spaces through tree and garden planting that offer areas for relaxing and contemplation.





Wellington Square/Kudnartu



Gardens Precinct



Precinct Snapshot

Gardens included in Precinct

- Palmer Gardens/Pangki Pangki (Park 28)
- Brougham Gardens/Tantutitingga (Park 29)
- Pennington Gardens

Size

7.6 hectares or 0.8% of the total area of the Adelaide Park Lands

Tree Count

21% canopy cover provided by 539 trees

Key Precinct Uses

- Formal gardens
- Lawn areas
- Notable plant specimens
- Women's War Memorial Garden, Cross of Sacrifice and Stone of Remembrance

Context

Brougham Gardens/Tantutitingga (Park 29) and Palmer Gardens/Pangki Pangki (Park 28) are formal gardens providing attractive and high quality open spaces within the most densely populated areas of the city. Both gardens have largely retained their original shape and form and are characterised by substantial tree planting, including a significant palm collection, reinforcing a Victorian gardenesque landscape. The Gardens also accommodate a distinctive axial pathway system dating from the 1870s which complements the nineteenth century character of the surrounding Victorian mansions, churches and slate kerbing.

Kaurna

In 1972 an Aboriginal Tent Embassy was set up in the Precinct in support of the national tent set up on the lawns of Parliament House.

The Kaurna translation of Tantutitingga is Native Lilac Place (Hardenbergia violacae). Pangki Pangki was a Kaurna tracker and guide.

Historic Heritage

Overall, the Precinct retains the original shape and form of the Parks as devised by Colonel William Light.

Palmer Gardens/Pangki Pangki (Park 28) and Brougham Gardens/Tantutitingga (Park 29) do not contain any State or Local Heritage Places.

The Women's War Memorial Garden, Cross of Sacrifice and Stone of Remembrance are located in Pennington Gardens East and a State Heritage Place. This garden, dating from the early 1920s is a tribute to the women of South Australia and their contributions during the First World War.

Landscape

Brougham Gardens/Tantutitingga (Park 29) has vegetation and natural elements of merit including:

- Palm (Phoenix species) collection dating from 1890s arising from a donation from Sir Samuel Way

- Italian Cypresses *(Cupressus sempervirens)* act as a frame to the entry path on the northern flanks of the Garden.
- Carob *(Ceratonia siliqua)* on eastern triangle of the gardens.

Palmer Gardens/Pangki Pangki (Park 28) contains the following vegetation and natural elements of heritage value:

- Camphor Laurel (Cinnamomum camphora) located in the north-west corner of the gardens dated around the 1920s is of medium significance visually and botanically.
- The palm collection dating from 1890s arising from a donation from Sir Samuel Way. Four date palms are still evident and these have some historic and botanic significance.

Pennington Gardens was designed by Pelzer in the gardenesque style, with formal paths and garden beds. The redevelopment of Adelaide Oval has changed the layout but it retains its formality set with historic statues and a fountain.

Drivers for Change

Surrounded by growing resident and worker populations, Brougham Gardens/Tantutitingga (Park 29) and Palmer Gardens/Pangki Pangki (Park 28) will continue to provide appealing places of respite for local residents and visitors alike. The relocation of the Women's and Children's Hospital may change visitation to this area. Future uses of the Women's and Children's Hospital site will influence considerations for the Gardens Precinct. However, residential colleges adjacent Brougham Gardens/Tantutitingga (Park 29) and Palmer Gardens/Pangki Pangki (Park 28) will continue to see a need for informal recreation spaces for students and members of the public. Enhancing both Gardens with attractive planting regimes comprising a mix of exotic and native trees will provide residents and visitors with an appealing setting for a range of enriching outdoor activities and relaxation. The Gardens Precinct will continue to be attractive and well-designed oases in dense parts of the city, with high quality formal gardens, open vistas across playing fields, to the southern horizon, and towards the city centre.





Precinct Considerations

The following considerations will provide guidance for planning at the Precinct level and should be considered along with the Adelaide Park Lands wide planning considerations.

Existing Features

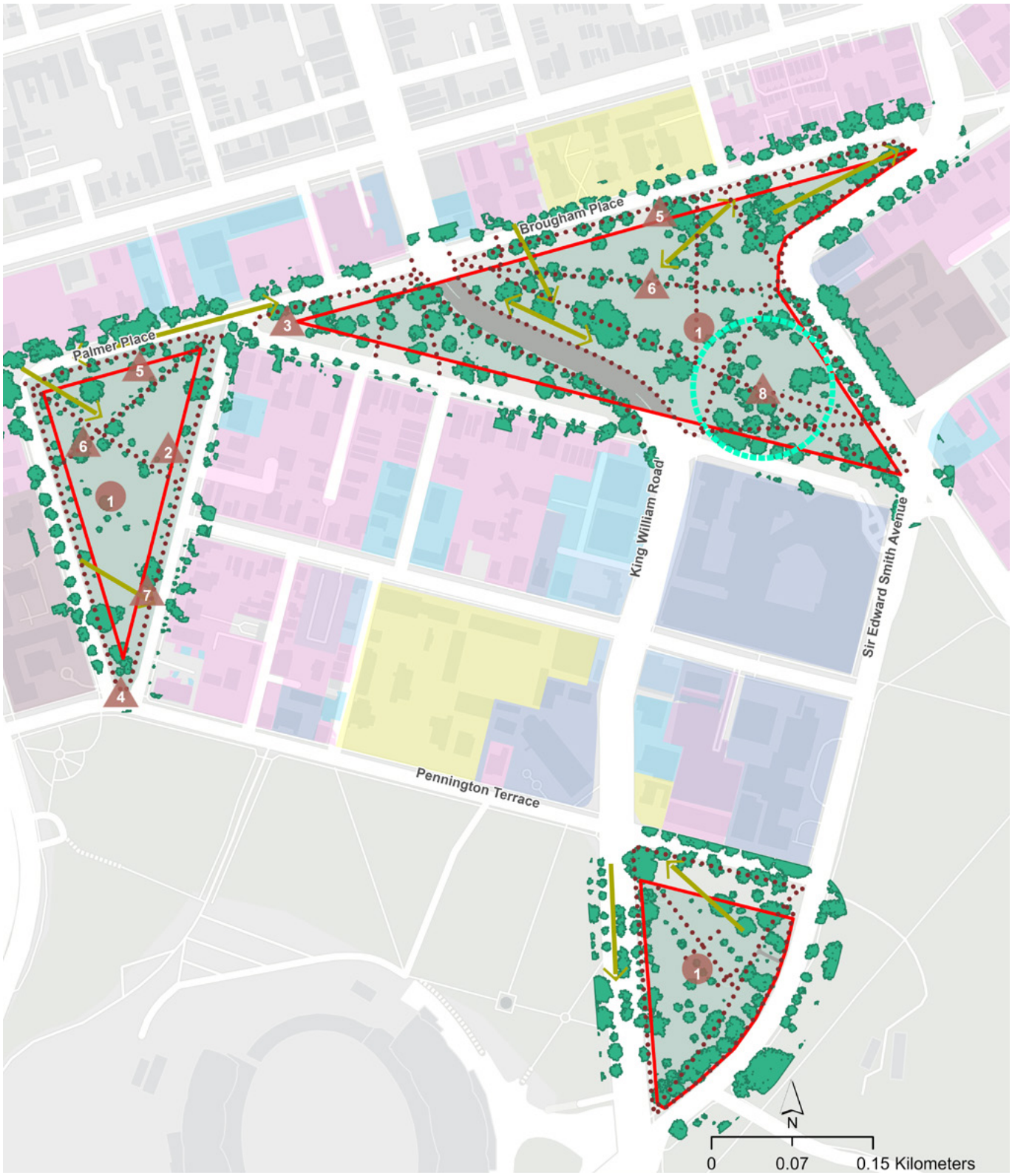
The Gardens contain cultural heritage landscape and contributory features such as exotic species, avenues and corridors.

1. Maintain and reinforce the structure and formal landscape character

Future Considerations

2. Improve path connections generally and increase the number of through routes
3. Improve connections between Palmer Gardens/ Pangki Pangki (Park 28) and Brougham Gardens/ Tantutitingga (Park 29)
4. Improve connections with Montefiore Hill and Light's Vision
5. Provide more places and spaces for relaxing and socialising along the northern interface
6. Provide more strategically located seating within the gardens and to its edges
7. Investigate potential locations for a significant piece of public art
8. Provide a hub with shelter, seating and opportunities for congregation and investigate opportunities for pop-up/plug in catering.

Gardens Precinct



Partnerships, Planning and Investment

In planning for the future of the Adelaide Park Lands, the following planning policy documents are relevant.

Strategic Planning Context

Management Plans for Adelaide Park Lands

The Government of South Australia and City of Adelaide are required to prepare Management Plans for the Adelaide Park Lands.

The City of Adelaide Community Land Management Plans (CLMP) for the Adelaide Park Lands set out objectives, policies and proposal for management of the Adelaide Park Lands, states performance targets and measures, provide information on any restrictions to public use or movement through the Adelaide Park Lands, and include specific information on relevant policies for the granting of leases and licences.

The CLMP must be consistent with the Adelaide Park Lands Management Strategy.

The state government's Management Plans for the Adelaide Park Lands outline the management for the Adelaide Park Lands under state government or Agency/Authority ownership.

Planning and Design Code – Adelaide Park Lands Zone

Development in the Adelaide Park Lands is assessed against the state government's Planning and Design Code.

The Adelaide Park Lands Zone provides the legislative planning framework and regulations for development within the Adelaide Parks Lands. The Zone covers all of the Adelaide Park Lands, and includes an Aquatic Centre subzone for part of Denise Norton Park/ Pardipardinyilla (Park 2).

Greater Adelaide Regional Plan (GARP)

The Greater Adelaide Regional Plan (GARP) provides the overall planning framework for the growth and development of the Greater Adelaide Region.

The GARP recognises the need for the protection of the Adelaide Park Lands as an important historical, cultural and environmental significant state asset whilst providing a range of recreational and sporting facilities for the community and surrounding state-significant strategic infill developments.

The GARP sets principles for connecting people with nature and places, creating quality open spaces for everyone and increasing climate resilience through green open spaces, biodiversity, increased tree canopy and reducing heat island impacts.

The GARP will allow for a holistic view of growth for the Greater Adelaide Region which must be considered in the planning for the Adelaide Park Lands, as an open space system for all South Australians.

City of Adelaide – City Plan

City Plan is an urban design and strategic planning process that outlines the spatial vision, goals, and strategies for future sustainable growth and development across the City of Adelaide into the next decade to achieve a target population of 50,000 residents by 2036.

The City Plan links with the Adelaide Park Lands Management Strategy through Strategy 2 – Open Space at Your Doorstep. This City Wide Strategy outlines the need for The Adelaide Park Lands and the City Squares to provide places for active and passive recreation and social engagement with a mix of urban uses around the Squares.

City Plan contains data and insights for the Adelaide Park Lands through a range of spatial data layers. These layers provide contextual strategic planning information to assist in evidence-based decision making for the Adelaide Park Lands.



Greater Adelaide Open Space System

Much of what makes Adelaide such a unique and beautiful city is its open spaces and landscapes, including the Adelaide Park Lands.

The underpinning strength of open space for Greater Adelaide is the Greater Adelaide Open Space System (formerly the Metropolitan Open Space System) which is a network of parks and open spaces located throughout Greater Adelaide.

The Adelaide Park Lands and the River Torrens/ Karrawirra Pari are at the heart of the Greater Adelaide Open Space System.

The Adelaide Park Lands are a unique, National Heritage Listed landscape that require a holistic approach to increased greening, water sensitive urban design, stormwater management, water quality and climate resilience. The Adelaide Park Lands will be responsive to the needs of a growing population in the city, and continue to support the Greater Adelaide Open Space System.

Population Growth

The importance of enhancing and protecting the Adelaide Park Lands will increase as Greater Adelaide grows. As will the need for the expansion of the Greater Adelaide Open Space System with quality open green spaces in surrounding metropolitan Adelaide areas.

The Adelaide Park Land's surrounding suburbs of Bowden, Brompton, Thebarton, Kent Town, Keswick and Glenside are experiencing or anticipating significant population growth. They are identified as State Significant Infill areas in the Greater Adelaide Regional Plan.

Further growth along and south of Greenhill Road and selected locations in Burnside, Walkerville and Prospect Local Government Areas will increase demand for use of the Adelaide Park Lands and local open space provisions.

Prioritising works in the Adelaide Park Lands serving the largest population concentrations and areas of largest population increase will become important over the next 5 to 10 years.

Comparison of Open Space Systems

In South Australia there is a legislative requirement for new developments to contribute 12.5% of land toward public open space. A population-ratio standard is a method which can be applied to describe the provision of open space relative to the level of population.

12.5% of open space applied to 35 hectares of a low density development area equates to around 4 ha per 1,000 people (based on 15 dwellings per hectare and 1.9 persons per household). This figure is consistent with benchmarks used in the Australian Capital Territory (4 ha) and Queensland (4–5 ha) but greater than the New South Wales benchmark.

Forecast population increases vary from 3% in City of Unley to 43% in the City of Adelaide. Projected growth on the western, southern and northern boundaries of the Adelaide Park Lands is likely to have a significant impact on demand for quality and accessible open space.

As Greater Adelaide's population grows the proportion of open space per 1,000 people will reduce. It is imperative that there is shared investment in the Adelaide Park Lands and increased investment in open space provision through the expansion of the wider Greater Adelaide Open Space System. This public open space is required to support communities and is essential to the physical and social health and wellbeing of the community.

The following table outlines the allocation of open space for the City of Adelaide (Adelaide Park Lands) and the adjoining councils. The table highlights the adjoining councils that currently meet the benchmark of 4 hectares per 1,000 people.

Adjacent Council Comparison	Open Space (Hectares)	Ha per 1,000 people
City of Adelaide (Adelaide Park Lands - Community Land)	691	26.5
City of Norwood, Payneham and St Peters	180	4.85
Town of Walkerville	33	4.32
City of Burnside	190	4.18
City of Charles Sturt	403	3.39
City of West Torrens	173	2.84
City of Prospect	23	1.15
City of Unley	30	0.76

Figure 9 Adjacent Council Open Space Comparison
Source: Relevant Council Websites

The following table outlines the allocation of open space for four capital cities in Australia. The comparison highlights the significance of the open space provision in the capital city, which is one significant factor to the liveability of the City of Adelaide.

Capital City Comparison	Open Space (Hectares)	Ha per 1,000
City of Adelaide (Adelaide Park Lands - Community Land)	691	26.5
City of Melbourne	555	7.38
City of Perth	547	3.18
City of Sydney	377	2.36

Figure 10 Capital City Open Space Comparison
Source: Relevant Council Websites

Adelaide Park Land's Investment

Through the Strategy, the City of Adelaide and the Government of South Australia will investigate amendment of the Planning and Design Code, to introduce an Adelaide Park Lands Open Space Offset Scheme or Adelaide Park Lands Overlay to unlock investment in the Adelaide Park Lands. This initiative would apply to future developments that will rely on the Adelaide Park Lands for open space provision.



Return Areas

Continue to identify land within the Adelaide Park Lands that does not meet the definition of a 'Park Lands Purpose' and offers limited or restricted public access. It is a key priority that this land be returned to a 'Park Lands Purpose'.

Notable Return to Park Lands Areas

Outlined below are notable return to Park Lands Areas by the City of Adelaide and the Government of South Australia.

Road from Mills Terrace and Barnard Street to North Adelaide Station in Possum Park/ Pirltawardli (Park 1) in 1980	0.5 ha
Victoria Park/Pakapakanthi (Park 16) Racecourse built form and car park in 2008	1.6 ha
Fitzroy Croquet Club building in Reservoir Park/Kangatilla (Park 4) in 2004	121 m^2
Veale Gardens Conservatory in 2016	51m2

Figure 11 Adelaide Park Lands return areas by City of Adelaide

SA Water land in Gladys Elphick Park/Narnungga (Park 25) in 2015	5.4 ha
Hackney Bus Depot to Botanic Garden (not including the Tram Barn or Goodman Building) in 1988	5.46 ha
Land West of Morphett Street bridge – (Helen Mayo Park/Tulya Wardli) in 1992	3.2 ha
Former Royal Adelaide Hospital car park in Frome Park/Nellie Raminyemmerin in 1990	1.8 ha
E&WS depot in Rundle Park/Kadlipina (Park 13) in 1984	1.3 ha
Old Bureau of Meteorology in Ellis Park/Tampawardli in 1979	0.3 ha
Post-tel Recreational Institute in Ellis Park/Tampawardli (Park 24) in 1990	0.8 ha
Land either side of North Adelaide Station Road (including woodyard site) in Mary Lee Park Tulya Wardli (Park 27B) in 1990	1.1 ha
North Adelaide Railway Station in Possum Park/Pirltawardli (Park 1) in 1989	0.2 ha

Figure 12 Adelaide Park Lands return areas by Government of South Australia and Australian Government

Return Areas Schedule

A review has been undertaken to identify opportunities to return areas of the Adelaide Park Lands. The following assessment criteria has been used as part of this review.

The transfer of any land from the Government of South Australia to the City of Adelaide would be dependent on a case being made to the relevant registered custodian of the land.

- Land that is currently under the care, control or management of the Crown or a state authority that could be transferred to the care, control and management of the City of Adelaide to allow for increased public access.
- Hardstand areas that no longer meet their intended use (eg sports courts that are no longer used for sport), and could be returned to a Park Lands Purpose.

Consultation with stakeholders will be undertaken to further investigate the opportunities outlined in the Return Areas Schedule.



Site No.	Park No.	Custodian	Current Description	Opportunity	Priority/ Timing
1	27	Corporation of the City of Adelaide	Informal Car Parking (next to North Adelaide Train Station)	Investigate opportunities to return to a Park Lands Purpose	Medium 5–10 Years
2	27	Corporation of the City of Adelaide	Vacant land	Investigate opportunities to return to a Park Lands Purpose	Medium 5–10 Years
3	27	Corporation of the City of Adelaide	Former sports courts	Investigate opportunities to return to a Park Lands Purpose – removal of hardstand surface	High 1–5 Years
4	27	Corporation of the City of Adelaide	SAPOL Road Safety Centre	Undertake feasibility to maintain Mock Roadway or return to Park Lands Purpose following the relocation of SAPOL facilities in 2024	High 1–5 Years
5	27	Corporation of the City of Adelaide	SAPOL – horse agistment area	Investigate opportunities to return to a Park Lands Purpose post the new Women's and Children's Hospital completion	Medium 5–10 Years

Site No.	Park No.	Custodian	Current Description	Opportunity	Priority/ Timing
6	27	Minister for Climate, Environment and Water	Adelaide Gaol, Powder Magazine and Roma Mitchell Garden	Investigate opportunities to increase public access to the Adelaide Gaol Precinct	Medium 5–10 Years
7	27	Minister for Climate, Environment and Water	Linear strip of land on edge of River Torrens Trail	Investigate opportunities to return to City of Adelaide	Medium 5–10 Years
8	27	Corporation of the City of Adelaide	Helen Mayo Park/ Tulya Wardli (Park 27)	Through master planning, return to Park Lands Purpose and increase public accessibility	High 1–5 Years
9	27	Minister for Infrastructure and Transport	Car Park	Investigate opportunities to return to City of Adelaide and return to Park Lands Purpose	High 1–5 Years
10	23	Corporation of the City of Adelaide	Former sports courts	Investigate opportunities to return to a Park Lands Purpose	High 1–5 Years
11	22	Corporation of the City of Adelaide	Former sports courts	Investigate opportunities to return to a Park Lands Purpose – removal of hardstand surface	High 1–5 Years
12	21	Corporation of the City of Adelaide	Access driveway	Investigate opportunities to return to a Park Lands Purpose – removal of hardstand surface	High 1–5 Years
13	21	Corporation of the City of Adelaide	Former sports courts/club room	Investigate opportunities to return to a Park Lands Purpose	High 1–5 Years
14	12	Minister for Climate, Environment and Water	Torrens Parade Ground	Investigate opportunities to increase public use of this space	Low 10–20 Years
15	15	Corporation of the City of Adelaide	Temporary skate park	Investigate opportunities to formalise the temporary skate park or remove hardstand areas and return to a Park Lands Purpose	High 1–5 Years
16	6	Corporation of the City of Adelaide	Sports courts	Investigate opportunities to return to a Park Lands Purpose – removal of hardstand surface	High 1–5 Years
17	4 and 5	Corporation of the City of Adelaide	Lefevre Road	Undertake traffic modelling and consultation with community and Department for Infrastructure and Transport to investigate the closure of Lefevre Road and return to a Park Lands Purpose	Low 10–20 Years
18	2	Corporation of the City of Adelaide	Adelaide Aquatic Centre	Post completion of the new Adelaide Aquatic Centre – return existing Adelaide Aquatic Centre to a Park Lands Purpose	High 1–5 Years
19	Victoria/ Tantanyangga, Hindmarsh/ Mukata, Hurtle/ Tangkaira, Light/Wauwi, Wellington/ Kudnartu, Whitmore/ Iparrityi	Corporation of the City of Adelaide	Adelaide Park Lands roadways	Through master planning, investigate opportunities to return portions of Adelaide Park Lands roadways around the Park Lands Squares to a Park Lands Purpose through the narrowing of Park Lands roads	Low 10–20 Years

Figure 13 Return Areas Schedule

Return Areas Map



Return Area Priorities to 2036

Helen Mayo Park/Tulya Wardli (Park 27C)
Helen Mayo Park/Tulya Wardli (Park 27C) is an under-utilised park with little amenity offered for community benefit. A master plan is required to guide the strategic improvement of the site and integration with the city and surrounding built and natural form.

SAPOL Horse Agistment Area
The relocation of the South Australian Mounted Police Unit provides an opportunity to return the former horse agistment area to a Park Lands Purpose and to integrate with the surrounding open space, recreation and health precincts.

Former Hard Courts (Tennis, Netball, Basketball) and Carparking
Hard court spaces that are no longer in use provide an opportunity to increase permeable surfaces, water retention and tree canopy in the Adelaide Park Lands.



Investment Framework

To achieve the Strategy's outcomes, clear pathways for investment are required.

Investment Opportunities

The following are identified as the key funding sources for investment in the Adelaide Park Lands.

- Capital City Committee
- Government of South Australia
- City of Adelaide
- Adjoining councils
- Lease/licence holders in the Adelaide Park Lands

In addition to the City of Adelaide's annual investment in the maintenance of the Adelaide Park Lands and ongoing infrastructure maintenance and improvement program, the City of Adelaide has committed to a program of annual investment to upgrade or redevelop community buildings in the Adelaide Park Lands.

The City of Adelaide's substantial capital investment in the Adelaide Park Lands enhances and protects the Adelaide Park Lands as a highly valued green space, ensuring its ecological integrity and providing vital recreational opportunities for the community.

Partnerships/Co-Investment (all or combination of)

- City of Adelaide and Government of South Australia
- City of Adelaide and Lease/Licence holders
- City of Adelaide and adjoining councils
- City of Adelaide and community organisations
- City of Adelaide and Australian Government
- Philanthropy
- Community organisations – Sporting Clubs
- Volunteering

Partnerships

The implementation of this Strategy will be overseen by Kadaltilla in conjunction with the City of Adelaide and the Government of South Australia. It involves the participation of many delivery partners, including Kaurna Yerta Aboriginal Corporation, Government of South Australia departments, agencies, adjoining local councils, volunteers and the broader community.

Investment Pathways

Investment in delivering this Strategy will be pursued as follows:

Asset renewal or improvements
- City of Adelaide/Government of South Australia/ Australian Government
- Partnerships/Co-investment

Environmental/Natural System
- City of Adelaide/Government of South Australia
- Partnerships/Co-investment
- Volunteering
- Philanthropy

Community Sports
- Partnerships/Co-investment
- Community organisations/Sporting clubs
- Philanthropy

Tourism and Heritage
- City of Adelaide/Government of South Australia/ Australian Government
- Partnerships/Co-investment
- Philanthropy

Major public infrastructure
- City of Adelaide/Government of South Australia/ Australian Government
- Partnerships/Co-investment

Investment Assessment Criteria

Future investment in the Strategy seeks to:

- Reflect growth in the city and adjoining council areas
- Provide trail, path connectivity and improving active transport access to the Adelaide Park Lands
- Resolve gaps in the quantity, quality, mix and type of open spaces
- Provide opportunities to enhance connectivity through waterways and biodiversity corridors
- Protect and enhance Aboriginal and Historic Heritage

- Improve Connection to Country and reconciliation
- Protect and enhance National Heritage Values
- Service the South Australian community
- Acknowledge current trends and future population and demographic projections
- Improve climate resilience
- Meet conservation and biodiversity priorities, based on comprehensive biodiversity survey data
- Improve vegetation quality and increase tree canopy coverage
- Reduce and mitigate urban heat effects
- Improve water quality and flood mitigation
- Align with state and federal strategic open space objectives.

4-Year Investment Priorities

Priority projects have been identified to guide future investment in the enhancement and protection of the Adelaide Park Lands. Projects should leverage state and federal investment in community infrastructure to address societal change, population increase and the need for climate resilience.

Projects

- Strategic Water Resources
- Helen Mayo Park/Tulya Wardli (Park 27C)
- Victoria Park/Pakapakanthi (Park 16) Master Plan implementation
- Adelaide Aquatic Centre Development
- Adelaide Park Lands Trail improvements
- New Women's and Children's Hospital
- Bonython Park/Tulya Wardli (Park 27) Master Plan including Kate Cocks Park/Port Road Development
- Golden Wattle Park/Mirnu Wirra (Park 21 West) Community Building Redevelopment
- Mary Lee Park/Tulya Wardli (Park 27B) Community Building Redevelopment
- Increasing greening and canopy cover
- Light Square/Wauwi event infrastructure
- Greenhill Road Corridor
- Northern Park Lands Master Planning
- Whitmore Square/Iparrityi Stage 2
- River Torrens/Karrawirra Pari Restoration
- Establish and implement a biodiversity monitoring program
- State Heritage Listing of the Adelaide Park Lands



Appendices

Appendix A – Adelaide Park Lands Tenure



Appendix A – Adelaide Park Lands Tenure

In accordance with Section 18(3)(a) of the *Adelaide Park Lands Act 2005* the following table outlines; (i) the occupation, tenure and existing use of the land; and (ii) provides information about the State Government's or the Council's (as the case may be) plans for the use and management of the land into the future; and (iii) identifies any plans or feasible options for increasing public access to the land for recreational purposes (taking into account the existing or proposed use of the land); and (iv) if the land is owned, occupied or under the care, control or management of the Crown or a State authority—provide information about its suitability for use as park lands under the care, control and management of the Adelaide City Council, or through transferring the land to the Council, and, if appropriate, a program for its future use as park lands.

The Land Tenure list is current as at August 2024.

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
D24125Q1	CR5667/595	The Corporation of The City of Adelaide	G S Kingston Park/ Wirrarninthi (Park 23)	Continue existing use
D24125Q2	CR5667/595	The Corporation of The City of Adelaide	G S Kingston Park/Wirrarninthi (Park 23)	Continue existing use
D28392A33	CR5739/885	Minister for Environment and Water	Bonython Park/Tulya Wardli (Park 27) Linear reserve and olive grove adjacent to the River Torrens/Karrawirra Pari and rail corridor and between the weir and rail bridge	Potential transfer to City of Adelaide for care, control and management subject to resolution of potential contamination concerns.
D28393A1	CR6245/913	Minister for Education	Adelaide Botanic High School	Current use to continue
D30327A51	CR6102/709	The Corporation of The City of Adelaide	Mary Lee Park/Tulya Wardli (27B)	Current use to continue
D30327A53	CR5260/214	Transadelaide	Railway corridor between the River Torrens/Karrawirra Pari and North Adelaide Railway Station. Vested for railway purposes pursuant to the *Railways Act 1878*.	Current use to continue
D33772A102	CL6185/34 OM021309	Riverside Rowing Club Inc.	Riverside Rowing Club – west of Morphett Street bridge	Current use to continue. Transfer to City of Adelaide as part of Adelaide Botanic High land swap – Future consideration of site as part of master planning for Helen Mayo Park/Tulya Wardli (Park 27C)

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
D33772A103	CR5220/707	Minister for Environment and Water	Pulteney Boat Club – west of Morphett Street bridge	Current use to continue. Transfer to City of Adelaide as part of Adelaide Botanic High land swap – Future consideration of site as part of master planning for Helen Mayo Park/ Tulya Wardli (Park 27C)
D34345A5	CT5320/362	Minister for Transport, Infrastructure and Local Govt	Railway corridor north of North Adelaide Railway Station.	Continue existing use
D34345A6	CR5373/132	The Corporation of The City of Adelaide	North Adelaide Railway Station	Opportunity to repurpose North Adelaide Railway Station building and return southern portion of allotment to an Adelaide Park Lands Purpose
D35577A100	CR5220/421	The Corporation of The City of Adelaide	Unley High School and Norwood International High School Rowing Shed	Continue existing use
D35577A101	CL 6229/569	Adelaide Rowing Club Inc.	Adelaide Rowing Club	Current use to continue – Potential transfer to City of Adelaide for care, control and management
D35577A102	CR5220/422	The Corporation of The City of Adelaide	Adelaide Riverbank Lawns	Continue existing use
D38136A104	CT6260/649	Minister for Infrastructure and Transport	Car park	Opportunity for transfer to City of Adelaide as part of master planning for Helen Mayo Park/Tulya Wardli (Park 27C)
D51367A11	CT6077/8	The University of Adelaide	The Faculty of Health and Medical Sciences, University of Adelaide — Helen Mayo North Building	Continue existing use
D51367A12	CT 6203/478	Urban Renewal Authority	Hanson Institute. Dedicated as a reserve for the purposes of the Institute of Medical and Veterinary Science pursuant to s.5 of the Crown Lands Act 1929.	Continue existing use
D51367A13	CT 6203/493	Urban Renewal Authority	EziPark Car Park. Dedicated as a reserve to be used for the purposes of car parking pursuant to s.5 of the Crown Lands Act 1929.	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
D51367A14	CT 6203/582	Urban Renewal Authority	Lot Fourteen development	Innovation Precinct
D51367A22	CT5696/850	The Corporation of The City of Adelaide	Frome Park/Nellie Raminyemmerin	Portion of allotment for Adelaide Botanic High expansion
D56872A51	CR6166/588	The Corporation of The City of Adelaide	Bonython Park/Tulya Wardli (Park 27) – vacant land east of SAPOL Barracks	To form part of the New Women's and Children's Hospital Site (car park)
D56872A54	CR6166/588	The Corporation of The City of Adelaide	Gladys Elphick Park/ Narnungga (Park 25)	Continue existing use
D56872A62	CT5999/487	Minister for Transport, Infrastructure and Local Govt	Railway land under Port Road bridge	Continue existing use
D56872A63	CT5999/494	Minister for Transport, Infrastructure and Local Govt	Railway land under Port Road bridge	Continue existing use
D56872A72	CT6171/219	Minister for Transport, Infrastructure and Local Govt	Railway land under Port Road bridge	Continue existing use
D56872A74	CR6112/377	The Corporation of The City of Adelaide	Gladys Elphick Park/ Narnungga (Park 25)	Continue existing use
D56872A80	CR5999/489	The Crown	South Australian Police Barracks	To form part of the New Women's and Childrens Hospital Site (Main Building)
D59055Q101	CT 6260/651	Urban Renewal Authority	Roadway east of Montefiore Road	Continue existing use
D59055Q102	CT 6260/651	Urban Renewal Authority	Roadway east of Montefiore Road	Continue existing use
D66751A101	CR5943/442	Board of the Botanic Gardens and State Herbarium	Botanic Garden of Adelaide	Continue existing use
D73209A60	CT6181/304	Minister for Education and Child Development	Adelaide High School	Continue existing use
D73209A65	CT6102/724	The Corporation of the City of Adelaide	Ellis Park/Tampawardli (Park 24)	Continue existing use
D73209A66	CT6181/304	Minister for Education and Child Development	Adelaide High School	Continue existing use
D73209Q61	CR6102/722	The Corporation of the City of Adelaide	Ellis Park/Tampawardli (Park 24)	Continue existing use
D73209Q62	CR6102/722	The Corporation of the City of Adelaide	G S Kingston Park/Wirrarninthi (Park 23)	Continue existing use
D73209Q63	CR6102/722	The Corporation of the City of Adelaide	G S Kingston Park/Wirrarninthi (Park 23)	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
D73606A200	CR6161/289	The Corporation of the City of Adelaide	Helen Mayo Park/Tulya Wardli (Park 27C)	Future master planning of site to determine opportunities
D73606A201	CR6102/700	The Corporation of the City of Adelaide	Bonython Park/Tulya Wardli (Park 27) – river bank	Future master planning of Helen Mayo Park/ Tulya Wardli (Park 27C) to determine opportunities
D73606A204	CR6102/701	The Corporation of the City of Adelaide	Bonython Park/Tulya Wardli (Park 27) – car park	Future master planning of Helen Mayo Park/ Tulya Wardli (Park 27C) to determine opportunities
D81642A100	CR6102/703	The Corporation of the City of Adelaide	Tarntanya Wama (Park 26) – Adelaide Oval surrounds and Pennington Gardens	Continue existing use
D81642A105	CR6102/711	The Corporation of the City of Adelaide	Mary Lee Park/Tulya Wardli (Park 27B)	Continue existing use
D81642A106	CR6102/711	The Corporation of the City of Adelaide	Possum Park/Pirltawardli (Park 1) – Golf Course	Continue existing use
D81642A107	CR6102/710	The Corporation of the City of Adelaide	Possum Park/Pirltawardli (Park 1) – Golf Course	Continue existing use
D81642A108	CR6102/710	The Corporation of the City of Adelaide	Denise Norton Park/ Pardipardinyilla (Park 2) – Adelaide Aquatic Centre	New Adelaide Aquatic Centre – Future master planning of broader site to consider opportunities
D81642A109	CR6102/710	The Corporation of the City of Adelaide	Yam Daisy Park/Kantarilla (Park 3) – Key Biodiversity Area	Continue existing use
D81642A110	CR6102/713	The Corporation of the City of Adelaide	Bragg Park/Ngampa Yarta (Park 5)	Continue existing use
D81642A111	CR6102/713	The Corporation of the City of Adelaide	Lefevre Park/Nantu Wama (Park 6) – Horse depasturing	Continue existing use
D81642A112	CR6102/713	The Corporation of the City of Adelaide	The Olive Groves/Kuntingga (Park 7)	Continue existing use
D81642A113	CR6102/713	The Corporation of the City of Adelaide	The Olive Groves/Parngutilla (Park 8)	Continue existing use
D81642A114	CR6302/315	The Corporation of the City of Adelaide	Bundey's Paddock/Tidlangga (Park 9)	Continue existing use
D81642A115	CR6302/315	The Corporation of the City of Adelaide	Mistletoe Park / Tainmuntilla (Park 10)	Continue existing use
D81642A119	CR6182/535	The Corporation of the City of Adelaide	Victoria Park/Pakapakanthi (Park 16)	Continue existing use
D81642A120	CR6102/704	The Corporation of the City of Adelaide	Josie Agius Park/ Wikaparntu Wirra (Park 22)	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
D81642A121	CR6102/705	The Corporation of the City of Adelaide	Light Square/Wauwi (Northern section)	Continue existing use
D81642A122	CR6102/705	The Corporation of the City of Adelaide	Light Square/Wauwi (Western section)	Continue existing use
D81642A123	CR6102/706	The Corporation of the City of Adelaide	Hindmarsh Square/Mukata (all parts)	Continue existing use
D81642A124	CR6102/706	The Corporation of the City of Adelaide	Hindmarsh Square/Mukata (North East Corner)	Continue existing use
D81642A125	CR6102/706	The Corporation of the City of Adelaide	Hindmarsh Square/Mukata (South West Corner)	Continue existing use
D81642A126	CR6102/706	The Corporation of the City of Adelaide	Hindmarsh Square/Mukata (South East Corner)	Continue existing use
D81642A127	CR6102/702	The Corporation of the City of Adelaide	Whitmore Square/Iparrityi	Continue existing use
D81642A128	CR6137/492	The Corporation of the City of Adelaide	Hurtle Square/Tangkaira (South West Corner)	Continue existing use
D81642A129	CR6102/703	The Corporation of the City of Adelaide	Adelaide Oval Precinct	Continue existing use
D83004A8 (PART)	CT6145/130	Minister for Transport, Infrastructure and Local Govt,	Rail Corridor – West of Cemetery	Continue existing use
D85638A11	CR6166/588	The Corporation of the City of Adelaide	Southern section of New Royal Adelaide Hospital (open space)	Continue existing use
D85638A12	CR6112/475	The Corporation of the City of Adelaide	Gladys Elphick Park/ Narnungga (Park 25) – Urban Forest	Continue existing use
D85638A13	CR6166/588	The Corporation of the City of Adelaide	Bonython Park/Tulya Wardli (Park 27)	Portion of allotment will accommodate New Women's and Children's Hospital
D85638A14	CR6112/473	The Corporation of the City of Adelaide	Karrawirra Pari - River Torrens - North Western Section	Continue existing use
D85645A20	CT6238/315	Minister for Transport, Infrastructure and Local Govt	Australian Bragg Centre for Proton Therapy and Research (SAHMRI 2)	Continue existing use
D85645A30	CT6229/257	Minister for Transport, Infrastructure and Local Govt	SAHMRI (South Australian Health and Medical Research Institute)	Continue existing use
D85645A60	CT6072/231	Minister for Health and Wellbeing	South West section of New Royal Adelaide Hospital (open space)	Continue existing use
D86067A17	CR6144/507	The Corporation of the City of Adelaide	John E Brown Park/Tulya Wardli (Park 27A)	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
D86132A200	CR6074/282	Treasurer	National Wine Centre – Leased to Adelaide University	Continue existing use
D86132A201	CR6074/283	Board of the Botanic Gardens and State Herbarium	State Herbarium of South Australia – First Creek Wetland	Continue existing use
D88232A51	CR6159/446	The Corporation of the City of Adelaide	Victoria Square/Tarntanyangga – North west corner	Continue existing use
D88232A52	CR6159/446	The Corporation of the City of Adelaide	Victoria Square/Tarntanyangga – Northern portion	Continue existing use
D88232A53	CR6159/446	The Corporation of the City of Adelaide	Victoria Square/Tarntanyangga – North-eastern corner	Continue existing use
D88232A54	CR6152/729	Minister for Transport, Infrastructure and Local Govt	Tram corridor	Continue existing use
D88232A55	CR6159/446	The Corporation of the City of Adelaide	Victoria Square/Tarntanyangga – South-west corner	Continue existing use
D88232A56	CR6159/446	The Corporation of the City of Adelaide	Victoria Square/Tarntanyangga – Southern portion	Continue existing use
D88232A57	CR6159/446	The Corporation of the City of Adelaide	Victoria Square/Tarntanyangga – South-east corner	Continue existing use
D88232A58	CR 6152/729	Minister for Transport, Infrastructure and Local Govt	Tram corridor	Continue existing use
D88255A50	CR 6161/905	The Corporation of the City of Adelaide	Closed roadway (Deviation Road) form part of Narnungga Urban Forest	Continue existing use
D90434A23	CT 6145/121	Minister for Transport, Infrastructure and Local Govt	Rail Corridor - West of Cemetery	Continue existing use
D90434A24	CT 6145/122	Minister for Transport, Infrastructure and Local Govt	Rail Corridor - West of Ellis Park / Tampawardli	Continue existing use
D90434A25	CT 6145/123	Minister for Transport, Infrastructure and Local Govt	Rail Corridor - Section over Glover Avenue - Ellis Park / Tampawardli	Continue existing use
D90434A28	CT 6145/128	The Corporation of the City of Adelaide	Rail Corridor - Section over Glover Avenue - Ellis Park / Tampawardli	Continue existing use
D90434A31		The Corporation of the City of Adelaide	Rail Corridor - Section over Glover Avenue - Ellis Park / Tampawardli	Continue existing use
D90434A30	CT 6145/126	Minister for Transport, Infrastructure and Local Govt	Rail Corridor - West of Narnungga Urban Forest	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
D90661A100	CT 6125/317	Adelaide Cemetery Authority	Adelaide Cemetery	Continue existing use
D90661A101	CR 6125/318	The Corporation of the City of Adelaide	Linear strip in front of Adelaide Cemetary	Continue existing use
D92795A2	CR 6132/226	The Corporation of the City of Adelaide	King Rodney Park/Ityamai-itpina (Park 15)	Continue existing use
D111983A100	CT 6274/622	Minister for Transport and Infrastructure	Adelaide Medical School - North Terrace	Continue existing use
D111983A101	CT6274/623	Minister for Transport and Infrastructure	University of SA Bradley Building/MOD	Continue existing use
D111983A102	CT 6280/799	Minister for Health and Wellbeing	Royal Adelaide Hospital	Continue existing use
D111983Q103	CT 6260/652	Minister for Transport and Infrastructure	Rail Corridor - North of Health Precinct	Continue existing use
D111983Q104	CT 6260/652	Minister for Transport and Infrastructure	Rail Corridor - North of Health Precinct	Continue existing use
D121055A50	CR6302/307	The Corporation of the City of Adelaide	O-Bahn Corridor	Continue existing use
D121055A51	CR6302/308	Minister for Transport and Infrastructure	O-Bahn Corridor	Continue existing use
D121055A52	CR6302/309	The Corporation of the City of Adelaide	Rymill Park/Murlawirrapurka (Park 14)	Continue existing use
D121055A53	CR6302/317	The Corporation of the City of Adelaide	Rundle Park/Kadlitpina (Park 13)	Continue existing use
D121055A54	CR6302/311	Board of Botanic Gardens & The State Herbarium	Botanic Garden - Buildings and wetlands	Continue existing use
D121055A55	CR6302/312	Board of Botanic Gardens & The State Herbarium	Botanic Park	Continue existing use
D121055A56	CR6302/313	The Corporation of the City of Adelaide	Karrawirra Pari - River Torrens - section between Frome Rd Bridge and Hackney Road	Continue existing use
D121055A57	CR6302/314	The Corporation of the City of Adelaide	Karrawirra Pari - River Torrens - Bullrush Park/Warnpangga (Park 10)	Continue existing use
D128908A601	CT 6283/654	Adelaide Festival Centre Trust	Adelaide Fesitval Centre	Continue existing use
D128908A602	CT 6277/532	Urban Renewal Authority	Festival Plaza/Festival Tower	Continue existing use
D128908A603	CT 6283/655	Urban Renewal Authority	Portion of Festival Plaza/ Adelaide Casino	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
D128908A607	CT 6277/535	Urban Renewal Authority	Portion of Festival Plaza	Continue existing use
D128908Q604	CT 6277/534	Urban Renewal Authority	Adelaide Convention Centre/ Riverside Centre/ InterContinental Adelaide	Continue existing use
D128908Q605	CT 6277/534	Urban Renewal Authority	Adelaide Convention Centre/ Riverside Centre/ InterContinental Adelaide	Continue existing use
D128908Q606	CT 6277/534	Urban Renewal Authority	Adelaide Convention Centre/ Riverside Centre/ InterContinental Adelaide	Continue existing use
F11089A23 (PART)	CT5722/148	Minister for Transport, Infrastructure and Local Govt	Small section of railway corridor under Anzac Highway	Continue existing use
F218068A100	CR5779/242	The Corporation of the City of Adelaide	Wellington Square/Kudnartu	Continue existing use
F218072A109	CR6137/492	The Corporation of the City of Adelaide	Hurtle Square/Tangkaira - North-West Corner	Continue existing use
F218072A110	CR6137/492	The Corporation of the City of Adelaide	Hurtle Square/Tangkaira - North-East Corner	Continue existing use
F218072A114	CR6137/492	The Corporation of the City of Adelaide	Hurtle Square/Tangkaira - South-East Corner	Continue existing use
F219636A50	CT6141/463	Minister for Transport, Infrastructure and Local Govt	Small section of railway corridor - West of G S Kingston Park/Wirrarninthi (Park 23)	Continue existing use
F38386A23	CT5948/489	Minister for Environment and Water	Torrens Parade Ground and Buildings	Investigate opportunities to increase public use of this space
F38386Q20	CR6102/717	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12) - Torrens Parade Ground surrounds	Continue existing use
F38386Q21	CR6102/717	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12) - Torrens Parade Ground surrounds	Continue existing use
F38386Q22	CR6102/717	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12) - River Bank north of Adelaide University	Continue existing use
F41835A2	CR5807/962	The Corporation of the City of Adelaide	Karrawirra Pari - River Torrens - section between Lightning Bridge/Karntu Waadlakatha and Torrens Wier	Continue existing use
F41835A3	CR5807/963	The Corporation of the City of Adelaide	Karrawirra Pari - River Torrens - section between Torrens Wier and Montefiore Rd Bridge	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
F41835A4	CR5807/964	The Corporation of the City of Adelaide	Karrawirra Pari - River Torrens - section between Montefiore Rd Bridge and King William Rd Bridge	Continue existing use
F41835A5	CR5807/965	The Corporation of the City of Adelaide	Karrawirra Pari - River Torrens - section between King William Rd Bridge and Frome Rd Bridge	Continue existing use
F48969A100	CR6166/587	The Corporation of the City of Adelaide	Tramway adjacent Peacock Road	Continue existing use
F58800A10	CT6141/289	Minister for Transport, Infrastructure and Local Govt	Small section of railway corridor under Port Rd Bridge	Continue existing use
H105100S1007	CR5754/513	The Corporation of the City of Adelaide	Carriageway Park/Tuthangga (Park 17) - Glenelg Service Reservoir Historic Site	Continue existing use
H105100S1008	CR5754/514	The Corporation of the City of Adelaide	Bonython Park/Tulya Wardli (Park 27) - linear strip south of Torrens Wier	Continue existing use
H105100S1009	CR5765/293	The Corporation of the City of Adelaide	Bonython Park/Tulya Wardli (Park 27) - linear strip south of Torrens Wier - part of River Torrens trail	Continue existing use
H105100S1018	CR5737/419	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12) - Jolley's Boathouse, Adelaide High School Rowing Club, Torrens Rowing Club	Continue existing use
H105100S1187	CR6043/263	Royal Zoological Society of South Australia Inc	East end of Adelaide Zoo	Continue existing use
H105100S1198	CR5766/798	The Corporation of the City of Adelaide	G S Kingston Park/Wirrarninthi (Park 23)	Continue existing use
H105100S1203	CR5760/638	Minister for Environment and Water	Part of Old Adelaide Goal site	Current use to continue. Investigate opportunities to increase public access to the Adelaide Gaol Precinct post completion of the new Women's and Children's Hospital
H105100S1204	CR5761/141	Minister for Infrastructure	Portion of former Powder Magazine	Current use to continue. Investigate opportunities to increase public access to the Adelaide Gaol Precinct post completion of the new Women's and Children's Hospital

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
H105100S1205	CT6129/107	The University of Adelaide	The University of Adelaide	Continue existing use
H105100S1206	CT6129/107	The University of Adelaide	The University of Adelaide	Continue existing use
H105100S1207	CT6077/7	The University of Adelaide	The University of Adelaide	Continue existing use
H105100S510	CR5759/861	Libraries Board of South Australia	State Library	Continue existing use
H105100S519	CR5754/509	The Corporation of the City of Adelaide	Small portion of Adelaide High School - North East corner	Continue existing use
H105100S549	CR5756/336	Minister for Environment and Water	Old Adelaide Goal. Declared for Adelaide Goal purposes pursuant to the *Municipal Corporations Amendment Act 1863*.	Current use to continue. Investigate opportunities to increase public access to the Adelaide Gaol Precinct post completion of the new Women's and Children's Hospital
H105100S561	CR5759/681	South Australian Museum Board	SA Museum and old Armoury Building	Continue existing use
H105100S562	CR5759/863	Art Gallery Board	State Gallery	Continue existing use
H105100S590	CR6043/263	Royal Zoological Society of South Australia Inc	Adelaide Zoo	Continue existing use
H105100S591	CR5754/510	The Corporation of the City of Adelaide	Mistletoe Park/Tainmuntilla (Park 11) - Karrawirra Pari riverbank (Southern side)	Continue existing use
H105100S592	CT6129/107	The University of Adelaide	The University of Adelaide	Continue existing use
H105100S593	CR5251/900	University of South Australia	University of SA - City East Campus	Continue existing use
H105100S6017	CR6102/717	The Corporation of the City of Adelaide	Carriageway Park/Tuthangga (Park 17)	Continue existing use
H105100S6018	CR6102/717	The Corporation of the City of Adelaide	Peppermint Park/Wita Wirra (Park 18)	Continue existing use
H105100S6019	CR6102/717	The Corporation of the City of Adelaide	Pelzer Park/Pityarilla (Park 19)	Continue existing use
H105100S6020	CR6102/717	The Corporation of the City of Adelaide	Blue Gum Park/Kurangga (Park 20)	Continue existing use
H105100S6021	CR6102/717	The Corporation of the City of Adelaide	Veale Park/Walyu Yarta (Park 21) and Golden Wattle Park/ Mirnu Wirra (Park 21W)	Continue existing use
H105100S6023	CR6102/717	The Corporation of the City of Adelaide	G S Kingston Park/Wirrarninthi (Park 23) - Edwards Park	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
H105100S6026	CR6102/717	The Corporation of the City of Adelaide	Tarntanya Wama (Park 26) - Elder Park	Continue existing use
H105100S6028	CR5754/517	The Corporation of the City of Adelaide	G S Kingston Park/Wirrarninthi (Park 23) - North Eastern section	Continue existing use
H105100S610	CR6257/171	Minister for Education	Migration Museum and Chapel Café	Continue existing use
H105100S614	CR5756/657	Minister for Health and Ageing	Institute of Medical & Veterinary Science	Continue existing use
H105100S693	CT5685/768	The University of Adelaide	The University of Adelaide	Continue existing use
H105100S694	CT5685/769	The University of Adelaide	The University of Adelaide	Continue existing use
H105100S695	CT6077/7	The University of Adelaide	The University of Adelaide	Continue existing use
H105100S737	CT6129/107	The University of Adelaide	The University of Adelaide	Continue existing use
H105100S745	CR5759/682	South Australian Museum Board	The Science Centre and ArtLab	Continue existing use
H105100S756	CR5754/511	The Corporation of the City of Adelaide	National War Memorial	Continue existing use
H105100S762	CT6205/154	Urban Renewal Authority	Former SA Dental Hospital.	Lot Fourteen development
H105100S769	CR5754/512	The Corporation of the City of Adelaide	Tarntanya Wama (Park 26) - Pembroke, Unley High and Norwood High Rowing Club	Continue existing use
H105100S771	NA	The Corporation of the City of Adelaide	Tarntanya Wama (Park 26) - Pembroke, Unley High and Norwood High Rowing Club	Continue existing use
H106100S1191	CR5766/849	The Corporation of the City of Adelaide	Possum Park/Pirltawardli (Park 1) - unmade roadway through Golf Course	Continue existing use
H106100S1192	CR5744/254	The Corporation of the City of Adelaide	Brougham Gardens/ Tantutitingga (Park 29)	Continue existing use
H106100S1193	CR5896/254	The Corporation of the City of Adelaide	Brougham Gardens/ Tantutitingga (Park 29)	Continue existing use
H106100S1194	CR6142/421	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12)	Continue existing use
H106100S1604	CR6144/507	The Corporation of the City of Adelaide	Reservoir Park/Kangatilla (Park 4)	Continue existing use
H106100S1611	CR6144/507	The Corporation of the City of Adelaide	Mistletoe Park/Tainmuntilla (Park 10)	Continue existing use
H106100S1612	CR6144/507	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12)	Continue existing use

Parcel Identification	Title	Occupation	Existing Use	Future Plans or Feasible Options
H106100S1627	CR6144/507	The Corporation of the City of Adelaide	Possum Park/Pirltawardli (Park 1) - Golf Course	Continue existing use
H106100S1628	CR6144/507	The Corporation of the City of Adelaide	Possum Park/Pirltawardli (Park 1) - Golf Course	Continue existing use
H106100S1630	CR6144/507	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12)	Continue existing use
H106100S1631	CR6144/507	The Corporation of the City of Adelaide	Mistletoe Park/Tainmuntilla (Park 11) - Karrawirra Pari riverbank (Northern side)	Continue existing use
H106100S1633	CR6144/507	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12) - Norther portion	Continue existing use
H106100S1634	CR6144/507	The Corporation of the City of Adelaide	Brougham Gardens/ Tantutitingga (Park 29)	Continue existing use
H106100S1635	CR6144/507	The Corporation of the City of Adelaide	Brougham Gardens/ Tantutitingga (Park 29)	Continue existing use
H106100S1636	CR6144/507	The Corporation of the City of Adelaide	Brougham Gardens/ Tantutitingga (Park 29)	Continue existing use
H106100S1637	CR6144/507	The Corporation of the City of Adelaide	Brougham Gardens/ Tantutitingga (Park 29)	Continue existing use
H106100S1638	CR6144/507	The Corporation of the City of Adelaide	Palmer Gardens/Pangki Pangki (Park 28)	Continue existing use
H106100S1639	CR6144/507	The Corporation of the City of Adelaide	Tarntanya Wama (Park 26) - Pinky Flat	Continue existing use
H106100S1640	CR6144/507	The Corporation of the City of Adelaide	Possum Park/Pirltawardli (Park 1) - Par 3 Golf Course	Continue existing use
H106100S1641	CR6144/507	The Corporation of the City of Adelaide	Mary Lee Park/Tulya Wardli (Park 27B)	Continue existing use
H106100S1643	CR6059/925	Minister for Infrastructure	SA Water Reserve	Continue existing use
H106100S1644	CR6144/507	The Corporation of the City of Adelaide	Possum Park/Pirltawardli (Park 1) - Golf Course	Continue existing use
H106100S1648	CR6144/507	The Corporation of the City of Adelaide	Red Gum Park/Karrawirra (Park 12) - North West portion	Continue existing use
X1		Minister for Transport and Infrastructure	Forms part of Morphett Street Bridge	Continue existing use
X2		The Corporation of the City of Adelaide	Forms part of Morphett Street Bridge	Continue existing use

Figure 14 Adelaide Park Lands Tenure Schedule

Appendix B – Excluded Land

Parcel Identification	Title	Registered Proprietor/Custodian
D112570A1	CR6183/88	Minister for Environment and Water
D112570A2	CR6183/89	Minister for Environment and Water
D128908A608	CR6277/536	Minister for Infrastructure and Transport
D128908A609	CR6277/537	Minister for Infrastructure and Transport
D15497A29	CT5432/944	Australian Rail Track Corp Ltd
D56872A61	CT5999/486	Australian Rail Track Corp Ltd
D90434A26 (PART)	CT6148/335	Australian Rail Track Corp Ltd
D90434A29	CT6145/125	Australian Rail Track Corp Ltd
F14185A22	CT5803/625	Australian Rail Track Corp Ltd
F22072A23	CT5444/119	Australian Rail Track Corp Ltd
F22072A24	CT5444/119	Australian Rail Track Corp Ltd
F22072A25	CT5444/119	Australian Rail Track Corp Ltd
D90434A23 (PART)	CT6145/121	Minister for Infrastructure and Transport

Figure 15 Adelaide Park Lands Excluded Land



Appendix C – Adelaide Park Lands Leases Exceeding Five Years

In accordance with section 18(3)(b) of the *Adelaide Park Lands Act 2005* the following table identifies any land within the Adelaide Park Lands that is, or that is proposed to be (according to information in the possession of the Authority), subject to a lease or licence with a term exceeding 5 years (including any right of extension).

This table is current as at August 2024.

Lessor	Lessee	Term	Details	Comment
City of Adelaide	Prince Alfred College	21 years	Commenced 1/10/2021	Park 9
City of Adelaide	The University of Adelaide	42 years	Commenced 1/07/2013	Parks 10 and 12
City of Adelaide	Adelaide High School	21 years	Commenced 1/09/2013	Park 12 Rowing Club
City of Adelaide	Prince Alfred College	21 years	Commenced 1/03/2011	Park 12 Rowing Club
City of Adelaide	Jolley's Restaurant	3 + 5 + 5 + 5 years	Commenced 1/08/2021	Park 12 – east of King William Street bridge
City of Adelaide	Lounders Boatshed Café	15 years	Commenced 1/01/2023	Park 12 – east of King William Street Bridge
City of Adelaide	Popeye Motorboats	9 years 11 months	Commenced 1/01/2017	Park 12 – east of King William Street bridge
City of Adelaide	Adelaide Bowling Club	15 years	Commenced 1/01/2014	Adelaide Park 14 (Rymill Park/Murlawirrapurka) – Dequetteville Terrace
City of Adelaide	The Velo	9 years 11 months	Commenced 1/10/2015	Park 16 – Basement Grandstand Building
City of Adelaide	Victoria Park Social Club	9 years 11 months	Commenced 1/01/2017	Park 16 – Old Bookmakers and Entrance Building
City of Adelaide	Kiosk on 16	9 years 11 months	Commenced 12/01/2017	Park 16 – Victoria Park Kiosk
City of Adelaide	Adelaide Pavilion	4 + 6 + 5 years	Commenced 7/01/2019	Park 21
City of Adelaide	Bureau of Meteorology	42 years	Commenced 1/01/2017	Park 24
City of Adelaide	Comets Football Club Inc	21 years	Commenced 1/01/2019	Park 24
City of Adelaide	Adelaide High School	42 years	Commenced 7/01/2015	Park 24 – to facilitate the extension of Adelaide High School over Adelaide Park Lands
City of Adelaide	South Australian Cricket Association	21 + 21 years	Commenced 1/01/2017	Park 25
City of Adelaide	War Memorial Drive Tennis Club	50 years	Commenced 1/01/1999	Sublease to David Lloyd Leisure (Next Generation) – also for 50 years
City of Adelaide	SA Tennis Association	21 + 21 years	Commenced 7/01/2015	Park 26 – War Memorial Drive

Lessor	Lessee	Term	Details	Comment
City of Adelaide)	Minister for Transport and Infrastructure (DPTI)	80 years	Expires 16/11/2091	Park 26 – Adelaide Oval East and West. Subleased to Stadium Management Authority (SMA)
City of Adelaide	Minister for Transport and Infrastructure (DPTI)	80 years	Expires 16/11/2091	Park 26 – Adelaide Oval #2
City of Adelaide	Minister for Police (SAPOL)		Expires 28/02/2030	Park 27 – SAPOL mock roadway
City of Adelaide	Minister for Health	42 years	Commenced 1/01/2016	Land in front of the New Royal Adelaide Hospital
Government of South Australia	Adelaide Rowing Club – east of Morphett Street bridge	5 x 7 years extensions	Expires 1/03/2026	
Government of South Australia	Adelaide Festival Centre Trust	20 years plus 10 year extension	Expires 30/06/2038	Adelaide Festival Centre (Festival Theatre, Dunstan Playhouse, Amphitheatre, Space Theatre)
Government of South Australia	Pon Choung Law or Nominee	5 year term plus 2 x 5 year extensions	Expires 30/06/2038	Elder Park Kiosk
Government of South Australia	Commercial Operations Pty Ltd	10 year term plus 2 x 5 year extensions	Expires 30/12/2037	Malt Shovel Taphouse
Government of South Australia	Royal Geographical Society of South Australia	10 year term plus 3 x 10 years extensions	Expires 1/11/2056	State Library (within Mortlock wing)
Government of South Australia	Writers SA	5 year term plus 3 + 2 years extension	Expires 1/01/2028	State Library (within Institute Building)
Government of South Australia	National Archives of Australia – Adelaide office of the Australian Government agency	5 year term plus 5 year extension and annual renewal from 2023	Commenced 4/08/2014	State Library (within Mortlock wing)
Government of South Australia	ARTKW Pty Ltd (trading as AGSA Eats)	5 year term plus 3 + 2 year extensions	Commenced 1/06/2021	Art Gallery
Government of South Australia	RSL, Vietnam Veterans Association, RAAFA	5 year term plus 5 years extension (each lessee)	To commence in 2024	Torrens Parade Ground building

Figure 16 Adelaide Park Lands Leases Exceeding Five Years

Appendix D – National Heritage Values for the Adelaide Park Lands and City Layout

(as gazetted on 7 November 2008)

Criterion A: the place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is the physical expression of the 1837 Adelaide Plan designed and laid out by Colonel William Light. It has endured as a recognisable historical layout for over 170 years retaining the key elements of the plan; encompassing the layout of the two major city areas separated by the Torrens River, the encircling Park Lands, the six town squares, and the grid pattern of major and minor roads. It is substantially intact and reflects Light's design intentions with high integrity.

The Adelaide Park Lands and City Layout is of outstanding importance because it signifies a turning point in the settlement of Australia. It was the first place in Australia to be planned and developed by free settlers, not as a penal settlement or military outpost. The colony of South Australia was established by incorporation as a commercial venture supported by the British Government, based on Edward Wakefield's theory of systematic colonisation. To be commercially successful, there needed to be contained settlement to avoid speculative land sales and this settlement needed to be designed and planned to attract free settlers and to provide them with security of land tenure. The city layout with its grid plan expedited the process of land survey enabling both rapid settlement of land and certainty of title. The wide streets, public squares and generous open spaces provided amenity and the surrounding park lands ensured a defined town boundary while still allowing for public institutional domains. These elements are discernible today. The Adelaide Park Lands is also significant for the longevity of its protection and conservation. The Adelaide Municipal Corporation Act (1840) established the city council as the 'conservators' of the city and park lands. The establishment of the Park Lands Preservation Society in 1903, along with successive community organisations marks a continuing pattern in community support for safeguarding the significance of the Park Lands for the Adelaide community.

The Adelaide Plan was highly influential as a model for planning other towns in Australia and overseas. It is acknowledged by town planners and historians as a major influence on the Garden City Planning movement, one of the most important urban planning initiatives.

Criterion B: the place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth century park lands in Australia.

Criterion D: the place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of: (i) a class of Australia's natural or cultural places; or (ii) a class of Australia's natural or cultural environments.

The Adelaide Park Lands and City Layout is an exemplar of a nineteenth century planned urban centre. It demonstrates the principal characteristics of a nineteenth century city including a defined boundary, streets in a grid pattern, wide streets, public squares, spacious rectangular blocks and expansive public open space for commons and public domains. The expression of these features with their generous open space reflects the early theories and ideas of the

Garden City movement of an urban area set in publicly accessible open space with plantings, gardens, designed areas and open bushland.

Criterion F: the place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.

Adelaide Park Lands and City Layout is regarded throughout Australia and the world as a masterwork of urban design. Elements of the Adelaide Plan that contribute to the design excellence are the use of the encircling park lands to define the boundary of the development of the city and to provide for health, public access, sport, recreation and public institutional domains, thereby meeting both economic and social requirements. Designing the city layout to respond to the topography was highly innovative for its time with the northern sections of the city located and angled to take advantage of the rising ground while retaining the Torrens River as a feature within the Park Lands. The judicious siting and wide streets maximised views and vistas through the city and Park Lands and from some locations to the Adelaide Hills. The plan features a hierarchy of road widths with a wide dimension to principal routes and terraces and alternating narrow and wide streets in the east-west direction. Light's planning innovation is supported by substantial historical documentation.

The formal organisation, delineation and dedication of the Park Lands space was a pioneering technical achievement of William Light in the Adelaide Plan.

The overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas, formal avenues, plantations, gardens, use of specimen trees, botanically important living plant collections particularly at the Adelaide Botanic Garden and the strategic placement of buildings and statuary in their settings.

The creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills. The civic design of Adelaide was used as a model for founding many other towns in Australia and New Zealand and it is cited in later seminal Garden City planning texts including Garden Cities of Tomorrow by Ebenezer Howard.

Criterion G: the place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

The Adelaide Park Lands has outstanding social value to South Australians who see it as fundamental to the character and ambience of the city. The Park Lands with their recreation areas, sports grounds, gardens and public facilities provide venues for individual and group activities and events, meetings and passive and active recreation. The Park Lands also have significant social value due to the range of important civic, public, and cultural assets and institutions within it.

The present Adelaide Parklands Preservation Society is the latest in a long history of community groups dedicated to protecting the Adelaide Park Lands. These have included the Park Lands Defence Association (1869-87), the Park Lands Preservation League (1903, 1948) and the National Trust of South Australia. The longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands is exceptional.

Criterion H: the place has outstanding heritage value to the nation because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history.

Colonel William Light is most famously associated with the plan of Adelaide. He bore the ultimate responsibility, as recorded in his surviving publications and letters.

Glossary of Terms

In the context of the Adelaide Park Lands, the following explanation of terms apply:

Accessible
Removing barriers to enable all people to participate in their communities.

Activation / Activity / Activated
Activation of the Adelaide Park Lands refers to a diverse range of people feeling welcome and invited to use the spaces for a variety of purposes.

Places can be activated by inviting people to use them on a permanent or temporary basis.

Active transport
A physical activity undertaken as a means of transport and not purely as a form of recreation. It generally refers to walking, cycling and wheeling for travel, but may also include other activities such as the incidental activity associated with the use of public transport.

Adelaide Park Lands and City Layout
The physical expression of the Plan designed and laid out by Colonel William Light in 1837 which remains substantially intact.

Adelaide Park Lands Precincts
Individual parks within the Adelaide Park Lands that are grouped together to form Precincts for the purposes of the Adelaide Park Lands Management Strategy.

Building Footprint
The area of a building measured to the outside wall line, not including hardstand areas.

Concept Plan
A concept plan shows design ideas in a drawing. The concept should outline the proposed development and the potential use of a site. A concept plan will not generally contain detailed drawing of a proposal and may be for a whole Park, Precinct or single element (eg playspace).

Destination
A destination in the Adelaide Park Lands is a high quality place that has a distinctive landscape, design features, facilities and activities that respond to the needs of the public. These destinations form the basis of an Adelaide Park Lands hub.

Drivers for Change
Drivers for change refer to external factors that may affect the Adelaide Park Lands as a whole network or at a Precinct level, including population growth, climate change and societal changes.

Hardstand
Areas of impervious surfaces, not including building footprint.

Hub
A hub within the Adelaide Park Lands refers to destinations and centres of activity that respond to community needs and may be permanent, or temporary. Hubs contain a combination of publicly accessible amenities, such as picnic settings, shade structures and play spaces.

Key Biodiversity Area
The Key Biodiversity Areas (KBA) in the Adelaide Park Lands are a management boundary that prioritises high value native biodiversity. At least one Key Biodiversity Area is in each of the five recognised pre-European vegetation communities across the Adelaide Park Lands.

Landscape Typology / Character
Landscape Typology or Character of the Adelaide Park Lands refers to the interplay of vegetation, water bodies and other natural features, combined with the effects of land use and built development, which makes one landscape different from another.

Master Plan
A master plan is a long-term planning framework that presents a vision for the future and sets out priorities for change and planning principles for a defined Park or Precinct of the Adelaide Park Lands.

Open Space
Areas of grass, trees, or other vegetation, riparian areas, or hardstand set apart for recreational or aesthetic purposes in an otherwise urban environment that are freely accessible to the public.

Open Shelter/Pavilion
An open shelter/pavilion refers to a structure that is not enclosed, publicly accessible and not under lease or licence. The size of open shelters/pavilions will be a design response to the landscape typology/character and prioritise the use of natural materials.

Planning Considerations
Planning considerations both Park Lands wide and at the Precinct level provide future guidance for master plans or concept plans for parks or Precincts of the Adelaide Park Lands. Planning considerations are developed based on societal changes, population growth or where opportunities have been identified.

Regenerative Planning
Focusing on restoring the natural environment and encouraging long-term sustainability, increased biodiversity, and enhanced climate resilience.

Tree Canopy
Tree canopy in the Adelaide Park Lands as green infrastructure (trees and shrubs) identified at 1 metre and above.

Water Sensitive Urban Design (WSUD)
Water Sensitive Urban Design is an approach to the planning and design of urban environments that supports restoration of the natural water cycle and integrates more sustainable use of water resources such as stormwater and wastewater to protect water quality.

Kadaltilla®
Adelaide Park Lands Authority

P (08) 8203 7203
E kadaltilla@cityofadelaide.com.au
W cityofadelaide.com.au/Kadaltilla

Submission on draft Greater Adelaide Regional Plan – for approval

Strategic Alignment – Our Places

Public

Tuesday, 5 November 2024

City Planning, Development and Business Affairs Committee

Program Contact:
Sarah Gilmour, Associate Director Park Lands, Policy & Sustainability

Approving Officer:
Ilia Houridis, Director City Shaping

EXECUTIVE SUMMARY

The purpose of this report is to seek endorsement of a submission to the State Government's engagement on the draft Greater Adelaide Regional Plan (the draft GARP). The draft GARP is available in pdf format (Link 1) and digital online format (Link 2).

The State Planning Commission released the draft GARP on 23 September 2024 and is undertaking community engagement until 4 November 2024. The City of Adelaide submitted its draft submission on the draft GARP by the close of consultation on 4 November 2024. Pending the Council's decision, the endorsed submission will be submitted to the State Planning Commission by an agreed timeframe of 15 November 2024.

The State Planning Commission is seeking feedback on:

- The location of new housing and employment
- Major infrastructure required to support growth
- Specific areas that should be protected from future development.

Council Members were notified and invited to attend an online local government briefing held by the State Government on the draft GARP on 24 September 2024.

The City of Adelaide's submission (Attachment A) responds to the key considerations for local government identified by the State Planning Commission in making submissions, summarised as follows:

- Alignment with the City of Adelaide's strategic land use and local area planning and infrastructure strategies.
- Progress made by the City of Adelaide between the release of the GARP Discussion Paper and the draft GARP.
- Additional work by local governments relating to planning and specifically delivering on proposed targets and actions.

The City of Adelaide's submission outlines the role of the Capital City in Greater Adelaide, includes the Greater Adelaide Open Space System, that replaces the former Metropolitan Open Space System (MOSS), and makes 15 key recommendations for finalising the GARP. Specific commentary is provided on the targets and actions contained in the draft GARP.

The submission aligns with the strategic land use planning and spatial analysis in the *City Plan – Adelaide 2036* as well as relevant matters raised by the City of Adelaide in submissions on the Greater Adelaide Regional Plan Discussion Paper endorsed 14 November 2023 (Link 3) and the Expert Panel on the Planning System Implementation Review (January 2023).

The City of Adelaide seeks further collaboration with the State Planning Commission to include relevant data and outcomes from the *City Plan – Adelaide 2036*, and other strategies, in finalising the GARP.

The GARP relies on the State Infrastructure Strategy and State Transport Strategy to ensure coordinated planning and delivery of the outcomes. These key supporting strategies will not be finalised until 2025.

The City of Adelaide's submission seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.

RECOMMENDATION

The following recommendation will be presented to Council on 12 November 2024 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the submission on the draft Greater Adelaide Regional Plan as contained in Attachment A to Item 7.2 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024.
2. Authorises the Chief Executive Officer, or delegate, to make minor editorial or formatting amendments to finalise the submission on the draft Greater Adelaide Regional Plan as contained in Attachment A of Item 7.2 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Places Encourage bold, interesting and purposeful development that supports the changing needs of our community and city.
Policy	The recommendations proposed in this report align with the City of Adelaide's Strategic Plan 2024-2028, *City Plan – Adelaide 2036*, *Adelaide Park Lands Management Strategy*, *Integrated Climate Strategy*, *Economic Development Strategy* and *Housing Strategy*.
Consultation	This report responds to the State Planning Commission's consultation process regarding the development of a new Greater Adelaide Regional Plan (GARP). The City of Adelaide's draft submission is informed by endorsed Council strategies with input from across the organisation. Council Members were notified on 20 September 2024 of an invitation to attend an online local government briefing run by the State Government on 24 September 2024. Kadaltilla / Adelaide Park Lands Authority approved a submission on the draft GARP at its meeting held on 24 October 2024.
Resource	Not as a result of this report
Risk / Legal / Legislative	Not as a result of this report
Opportunities	Council endorsed the *City Plan – Adelaide 2036* as the strategic land use planning and urban design framework for the city and North Adelaide. The *City Plan – Adelaide 2036* was informed by extensive consultation, including with the State Government, and is a key City of Adelaide evidence base and input to the GARP. The submission contained in Attachment A is also informed by the City of Adelaide's submissions on the Greater Adelaide Regional Plan Discussion Paper (November 2023) and the Expert Panel on the Planning System Implementation Review (January 2023).
24/25 Budget Allocation	Not as a result of this report
Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	The GARP is a 30-year plan to strategically guide planning and land use planning across the Greater Adelaide Region.
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (e.g. maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

Background

1. The purpose of this report is to seek endorsement of a submission to the State Government's engagement on the draft Greater Adelaide Regional Plan (the draft GARP). The draft GARP is available in pdf format (Link 1) and digital online format (Link 2).
2. On 14 November 2023, the Council endorsed a response (Link 3) to the GARP Discussion Paper (Discussion Paper) which made 37 recommendations across the following seven focus areas:
    2.1. A climate resilient city
    2.2. Prioritise city growth
    2.3. Recognise Adelaide Park Lands and Karrawirra Pari
    2.4. A city of neighbourhoods
    2.5. Better infill outcomes
    2.6. Better connections to and around the CBD
    2.7. Respect traditions, heritage and culture.
3. The draft GARP responds at a high level to the majority of recommendations made by the City of Adelaide. Where matters are outstanding, these are reiterated in the submission to the draft GARP, including:
    3.1. Recognition and demonstration of alignment with *City Plan – Adelaide 2036*, *Housing Strategy – Investing in our Housing Future*, and *Economic Development Strategy*.
    3.2. Recognition of the important role of the Adelaide Park Lands and strengthening the alignment with the Adelaide Park Lands Management Strategy, including the need for funding contributions and capital investment.
    3.3. Acknowledgement of the need to review catalyst site policy as recommended by the Expert Panel on the State Government's Review of the Implementation of the Planning System.
    3.4. Strengthening and broadening references to adaptive reuse.
4. The draft GARP's key focus is to guide the growth and sustainable development of the Greater Adelaide Planning Region over the next 15-30 years. It aims to ensure a consistent supply of affordable land and diverse housing options while offering clear direction to the community, councils, and developers on Greater Adelaide's long-term growth.
5. The GARP focuses on preserving green spaces and tree canopies, modernising essential services and infrastructure, recognising neighbourhood character, and prioritising environmental sustainability.
6. The draft GARP identifies five (5) themes, six (6) outcomes and four (4) targets.
    6.1. The *City Plan—Adelaide 2036*—was developed in alignment with these themes and outcomes. Link 4 provides an assessment of the themes, outcomes, and targets.
7. The draft GARP identifies 37 actions over the next 5 years, with actions to be updated on a rolling basis. Key actions relevant to the City of Adelaide are addressed in **Attachment A**.
8. There is only one action (Action 6) that is specific to the City of Adelaide. This action proposes a State Government Code Amendment to increase building heights in the CBD, in conjunction with the Commonwealth Government and Adelaide Airport Ltd, within 2 years of finalising the GARP (ie by 2027).
9. The City of Adelaide has developed a multi-year Code Amendment Program to improve development policy in the Planning and Design Code. The Code Amendment program is designed to efficiently progress key issues-based amendments and enable meaningful public engagement on each issue.
10. The City of Adelaide's submission requests that the building heights Code Amendment be undertaken in collaboration with Council through its Code Amendment Program, and that *City Plan – Adelaide 2036* is used to guide where and to what extent building heights are reviewed.

Consultation on the draft GARP

11. The State Planning Commission released the draft GARP on 23 September 2024 and is undertaking community engagement and seeking feedback by 4 November 2024 to inform the GARP's finalisation.
12. The State Planning Commission is seeking feedback on:
    12.1. The location of new housing and employment

12.2. Major infrastructure required to support growth

12.3. Specific areas that should be protected from future development.

13. The State Planning Commission has indicated that the key considerations for local government in making submissions are:

13.1. Alignment with local government strategic land use and local area planning, and infrastructure strategies.

13.2. Progress made by local government between the release of the GARP Discussion Paper and the draft GARP.

13.3. Additional work by local governments relating to planning and specifically delivering on proposed targets and actions.

13.4. Feedback on growth assumptions used to inform the preparation of the draft GARP and principles (such as living locally) is not required as this was widely consulted on through the Discussion Paper.

The City of Adelaide's Submission

14. The City of Adelaide's submission (Attachment A) is structured to respond to the key considerations for local government identified by the State Planning Commission in making submissions.

15. It also outlines the role of the Capital City in Greater Adelaide, includes the Greater Adelaide Open Space System, that replaces the former Metropolitan Open Space System (MOSS), and makes 15 key recommendations, as follows:

15.1. Incorporate the strategic planning undertaken by the City of Adelaide through *City Plan – Adelaide 2036* and associated strategies when finalising the GARP in March 2025, including collaborating on the integration of local area planning outcomes and digital mapping layers.

15.2. The City of Adelaide seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.

15.3. Greater recognition of the role of the Capital City in supporting the Greater Adelaide Region's liveability.

15.4. The City of Adelaide (excluding the Adelaide Park Lands) is identified as a State Significant infill area (mapping on page 40 of the pdf version).

15.5. Well-timed infrastructure upgrades to meet future housing demand in the City of Adelaide, including investment by SA Water infrastructure and other essential utilities.

15.6. Infrastructure schemes should apply to State Significant infill areas in addition to growth areas.

15.7. Consideration is given to an urban renewal area in the CBD where there is a concentration of government land holdings and high ownership by the South Australian Housing Trust.

15.8. Include a review of the policies in the Affordable Housing Overlay as part of Action 11, and a wholesale review of the Affordable Housing Program as part of Action 12.

15.9. Missing Middle housing includes additional housing typologies that apply to the City of Adelaide to encourage diversity and housing choice (pages 77 to 80 of the pdf version).

15.10. Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.

15.11. Create an additional Action to undertake a Catalyst Site Policy Review Code Amendment (in accordance with the recommendations of the Expert Panel).

15.12. The Commission incorporates relevant *City Plan* data and outcomes into the Stage 1 GARP in March 2025 as a resource for State and local governments aligned with Action 4 – Local Government Strategic Planning; and that data-sharing agreements are resolved between levels of government.

15.13. Strengthen and broaden recognition of the role of the National Heritage listed Adelaide Park Lands within the open-space system for its contribution to biodiversity, canopy cover, recreation, tourism and Aboriginal and cultural heritage.

15.14. Strengthen the application and consideration of heritage policies at all levels of assessment including reference to opportunities for State Heritage listing of the Adelaide Park Lands to support Council's goal in achieving World Heritage listing, and recognition and management of the impact of infill on built heritage.

15.15. Master planned and infill sites near the Adelaide Park Lands provide on-site local open-space and mechanisms for investment in the Adelaide Park Lands.

16. The submission seeks further collaboration between the City of Adelaide and the State Planning Commission to include relevant data and outcomes from the *City Plan – Adelaide 2036* and other strategies, in finalising the GARP.

17. The GARP relies on the State Infrastructure Strategy and State Transport Strategy to ensure coordinated planning and delivery of the outcomes. These key supporting strategies will not be finalised until 2025.

18. Many of the outcomes are reliant on additional investigations and/or based on investigations that are not referenced or provided as part of the consultation process and have therefore not been reviewed (e.g., Open Space Strategy).

19. The GARP has limited strategically significant 'big moves', noting that further work/investigations, including input from local government, are still to be delivered in the next stage.

20. The City of Adelaide's submission seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.

Next Steps

21. The City of Adelaide's draft submission on the draft GARP was submitted by the end of consultation period on 4 November 2024.

22. Pending the Council's decision, the City of Adelaide's endorsed submission on the draft GARP will be finalised and submitted to the State Planning Commission by the agreed timeframe of 15 November 2024.

23. Administration will provide additional technical advice to the State Government Agency, Planning and Land Use Services, to strengthen or add technical detail to the strategies across a range of themes and outcomes consistent with endorsed Council strategies.

24. The State Government is expected to release the final GARP in the first quarter of 2025.

DATA AND SUPPORTING INFORMATION

Link 1 – Draft Greater Adelaide Regional Plan (pdf format)

Link 2 – Draft Greater Adelaide Regional Plan (digital online format)

Link 3 – Council's Greater Adelaide Regional Plan Discussion Paper Submission

Link 4 – Analysis of Themes, Outcomes and Targets in the draft GARP

ATTACHMENTS

Attachment A – Draft submission on the Draft Greater Adelaide Regional Plan

- END OF REPORT -

Enquiries: Sarah Gilmour
Reference:

November 2024

Planning and Land Use Services
Attention: Growth Management Team
Department for Housing and Urban Development
GPO Box 1815
ADELAIDE SA 5001

By email: plansasubmissions@sa.gov.au

Attention: State Planning Commission

Thank you for the opportunity to contribute to the development of the Greater Adelaide Regional Plan (GARP).

The City of Adelaide actively engaged with the State Planning Commission (the Commission) and Planning and Land Use Services (PLUS) during the GARP's development and welcomes the opportunity to further contribute to its finalisation.

The Council decided its submission on the draft GARP at its meeting held on 12 November 2024 (Enclosure 1).

The City of Adelaide's submission is structured to respond broadly to the key considerations for local government identified by the State Planning Commission in making submissions, summarised as follows:

- Alignment with the City of Adelaide's strategic land use and local area planning and infrastructure strategies.
- Progress made by the City of Adelaide between the release of the GARP Discussion Paper and the draft GARP.
- Additional work by local governments relating to planning and specifically delivering on proposed targets and actions.

It also outlines the role of the Capital City in Greater Adelaide, comments on the Greater Adelaide Open Space System, and makes 15 key recommendations for finalising the GARP.

The City of Adelaide's submission aligns with the strategic land use planning and spatial analysis in the *City Plan – Adelaide 2036.*

The City of Adelaide seeks further collaboration with the State Planning Commission to include relevant data and outcomes from the City Plan – Adelaide 2036, and other strategies, in finalising the GARP.

The City of Adelaide seeks a further round of consultation on the GARP when key State Government strategic documents are available and are proposed to be incorporated into the GARP.

*A*dditional technical advice prepared by Administration to strengthen or add technical detail to the strategies across a range of themes and outcomes is provided in Enclosure 2.

Specific commentary is provided on the targets and actions contained in the draft GARP.

The City of Adelaide's contact for further information about the submission is Sarah Gilmour, Associate Director Park Lands, Policy and Sustainability.

Kind regards

Michael Sedgman

Chief Executive Officer

Enc.

1 City of Adelaide submission to the draft Greater Adelaide Regional Plan

2 City of Adelaide administrative and technical detail for the draft Greater Adelaide Regional Plan

Enclosure 1. City of Adelaide submission to the draft Greater Adelaide Regional Plan

Alignment with the City of Adelaide's strategic land use and local area planning, and infrastructure strategies

During the draft GARP's development, the City of Adelaide completed comprehensive strategic land use and spatial planning.

The City of Adelaide acknowledges strong alignment between the themes and targets in the draft GARP and the City of Adelaide's strategies.

The City of Adelaide and the State Government are also key stakeholders in the Adelaide Park Lands Management Strategy. Following an extensive period of joint review by the City of Adelaide and the State Government, the Kadaltilla/Adelaide Park Lands Authority endorsed a comprehensive review of the strategy on 24 October 2024.

Work has commenced on the City of Adelaide's Integrated Transport Strategy and Social Infrastructure (Assets) Policy which are to be completed in 2025.

In accordance with Action 4 of the draft GARP the City of Adelaide submits the following to be addressed in the GARP:

- *City of Adelaide Strategic Plan – 2024-2028*
- *City Plan – Adelaide 2036*
- *Housing Strategy – Investing in our housing future*
- *Economic Development Strategy – A thriving economy for all*
- *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*
- *Homelessness Strategy – Everyone's Business*
- *Adelaide Park Lands Management Strategy – Towards 2036.*

Incorporate the strategic planning undertaken by the City of Adelaide through City Plan – Adelaide 2036 and associated strategies when finalising the GARP in March 2025, including collaborating on the integration of local area planning outcomes and digital mapping layers.

Progress made by the City of Adelaide between the release of the GARP Discussion Paper and the draft GARP

The City of Adelaide acknowledges that many of the recommendations made by the City of Adelaide on the Greater Adelaide Regional Plan Discussion Paper (the Discussion Paper) have been addressed in the draft GARP. Where outstanding recommendations remain relevant to the City of Adelaide these are reiterated in this submission for further consideration, with additional context showing alignment with the strategic planning work undertaken by the City of Adelaide in the intervening time.

The City of Adelaide supports the following elements of the draft GARP:

- Place-based and digital planning frameworks
- Housing as a fundamental right
- Aboriginal culture and collaboration
- Moving beyond sustainability to a regenerative future
- Living locally
- Expansion and review of affordable housing tools
- Recognition of the potential for adaptive reuse
- Recognition of the UNESCO World Heritage Listing bid
- Opportunities for collaboration between the City of Adelaide and the State Government to facilitate affordable housing in the city.

The Commission's submission on the City Plan in July 2024 identified strong alignments with the draft GARP, noting both the State Government and the City of Adelaide are focussed on population and housing growth, economic development and sustainable outcomes.

The City of Adelaide's submission to the GARP is directed towards these key alignments, particularly in regard to the actions, outcomes and targets.

The City of Adelaide acknowledges the significant investigations undertaken in the preparation of the draft GARP as outlined in the Technical Paper. This includes background research documents, including the Open Space Strategy, the State Infrastructure Strategy and State Transport Plan (proposed for 2025). These are key inputs into the draft GARP around future infrastructure and transport requirements and vital for consideration of the overall growth, liveability and climate impact of the region.

The City of Adelaide acknowledges that the draft GARP highlights the vital role local government plays in shaping the Greater Adelaide Region and emphasises a collaborative approach between State and local governments to achieve liveable, accessible, and inclusive communities.

The City of Adelaide seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.

The Role of the Capital City

The city centre will be increasingly important in providing housing, infrastructure, and services such as transport, social infrastructure, and open space to support the forecast growth of 670,000 people and 315,000 additional homes across Greater Adelaide.

The City of Adelaide supports the GARP's use of high-growth population projections and notes this growth is below the aspirational target of 50,000 people by 2036 set by the City of Adelaide.

The GARP seeks to balance population, housing, and job growth across the Greater Adelaide Region. The draft GARP reads as a metropolitan strategy with a focus on suburbs and future land supply in outer Greater Adelaide. The Capital City should be better recognised in vision statements and *Outcome 1: More housing in the right places*.

The draft GARP section on 'State-significant infill areas' makes multiple references to the Adelaide City Centre as a significant infill area; however, this is not shown in the corresponding mapping. Government land holdings and specifically ownership by the South Australian Housing Trust in the CBD, provide an opportunity to identify an urban renewal area.

The City of Adelaide seeks greater emphasis and detail regarding the role of the city centre in supporting Greater Adelaide's liveability based on the City Plan – Adelaide 2036.

The City Plan includes city-wide strategies that aim to unlock the growth potential of the city which is pivotal in supporting the Greater Adelaide Region through economic development and as the location for the largest educational institutions, healthcare providers, tourist accommodation, retail and innovation precincts.

The City Plan's definition of the 'Missing Middle' of housing is broader than the draft GARP and recognises additional typologies that are particularly suitable in the city context.

Similarly, the GARP's support for the adaptive reuse of existing buildings and heritage places should extend to policy that requires future developments to be designed for future alternative uses with mandatory adaptable floorplates.

The City of Adelaide seeks:

- Greater recognition of the role of the Capital City in supporting the Greater Adelaide Region's liveability.
- The City of Adelaide (excluding the Adelaide Park Lands) is identified as a State Significant infill area (mapping on page 40 of the pdf version).
- Well-timed infrastructure upgrades to meet future housing demand in the City of Adelaide, including investment by SA Water infrastructure and other essential utilities.
- Infrastructure schemes should apply to State Significant infill areas in addition to growth areas.
- Consideration is given to an urban renewal area in the CBD where there is a concentration of government land holdings and high ownership by the South Australian Housing Trust.
- Include a review of the policies in the Affordable Housing Overlay as part of Action 11, and a wholesale review of the Affordable Housing Program as part of Action 12.
- Missing Middle housing includes additional housing typologies that apply to the City of Adelaide to encourage diversity and housing choice (pages 77 to 80 of the pdf version).
- Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.
- Create an additional Action to undertake a Catalyst Site Policy Review Code Amendment (in accordance with the recommendations of the Expert Panel).
- The Commission to incorporate relevant City Plan data and outcomes into the Stage 1 GARP in March 2025 as a resource for State and local governments aligned with *Action 4 – Local Government Strategic Planning*; and that data-sharing agreements are resolved between levels of government.

Greater Adelaide Open Space System

The shared State Government and City of Adelaide, Adelaide Park Lands Management Strategy – Towards 2036, identifies urban renewal areas and State-Significant Infill Areas within 400 metres of the Adelaide Park Lands as partnership opportunities to ensure that the Adelaide Park Lands can respond to growth both within the City of Adelaide and surrounding Local Government areas.

These partnerships will require joint investment from both State and Local Government to ensure that the Adelaide Park Lands continue to be recognised not only for their aesthetic value but also for the social, cultural, heritage, environmental and economic benefits they provide for all South Australians.

The City of Adelaide seeks to:

- Strengthen and broaden recognition of the role of the National Heritage listed Adelaide Park Lands within the open space system for its contribution to biodiversity, canopy cover, recreation, tourism and Aboriginal and cultural heritage.
- Strengthen the application and consideration of heritage policies at all levels of assessment including reference to opportunities for State Heritage listing of the Adelaide Park Lands to support Council's goal in achieving World Heritage listing, and recognition and management of the impact of infill on built heritage.
- Ensure master-planned and infill sites near the Adelaide Park Lands provide on-site local open space provision and mechanisms for investment in the Adelaide Park Lands.

Summary of Key Recommendations

The City of Adelaide submits the following key recommendations in finalising the GARP.

- Incorporate the strategic planning undertaken by the City of Adelaide through City Plan – Adelaide 2036 and associated strategies when finalising the GARP in March 2025, including collaborating on the integration of local area planning outcomes and digital mapping layers.
- The City of Adelaide seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.
- Greater recognition of the role of the Capital City in supporting the Greater Adelaide Region's liveability.
- The City of Adelaide (excluding the Adelaide Park Lands) is identified as a State Significant infill area (mapping on page 40 of the pdf version).
- Well-timed infrastructure upgrades to meet future housing demand in the City of Adelaide, including investment by SA Water infrastructure and other essential utilities.
- Infrastructure schemes should apply to State Significant infill areas in addition to growth areas.
- Consideration is given to an urban renewal area in the CBD where there is a concentration of government land holdings and high ownership by the South Australian Housing Trust.
- Include a review of the policies in the Affordable Housing Overlay as part of Action 11, and a wholesale review of the Affordable Housing Program as part of Action 12.
- Missing Middle housing includes additional housing typologies that apply to the City of Adelaide to encourage diversity and housing choice (pages 77 to 80 of the pdf version).
- Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.
- Create an additional Action to undertake a Catalyst Site Policy Review Code Amendment (in accordance with the recommendations of the Expert Panel).
- The Commission incorporate relevant City Plan data and outcomes into the Stage 1 GARP in March 2025 as a resource for State and local governments aligned with *Action 4 – Local Government Strategic Planning*; and that data-sharing agreements are resolved between levels of government.
- Strengthen and broaden recognition of the role of the National Heritage listed Adelaide Park Lands within the open space system for its contribution to biodiversity, canopy cover, recreation, tourism and Aboriginal and cultural heritage.
- Strengthen the application and consideration of heritage policies at all levels of assessment including reference to opportunities for State Heritage listing of the Adelaide Park Lands to support Council's goal in achieving World Heritage listing, and recognition and management of the impact of infill on built heritage.
- Master planned and infill sites near the Adelaide Park Lands provide on-site local open-space provision and mechanisms for investment in the Adelaide Park Lands.

Enclosure 2 City of Adelaide administrative and technical detail for the draft Greater Adelaide Regional Plan

The following administrative feedback is provided on the draft GARP. City of Adelaide is referred to as CoA. Red text denotes suggested editorial changes. **Key recommendations in bold** align with the Council endorsed submission.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Vision and Context			
Introduction	Heritage and character buildings and places are valued by the community and contribute to Greater Adelaide placemaking and identity. Reference to this key part of Greater Adelaide should be included in the Introduction	*Heritage Strategy* *City Plan – Adelaide 2036*	**Change requested** Recommend referencing the role that heritage and character buildings and places play in Greater Adelaide placemaking and identity.
Pathways towards a regenerative future	Support moving beyond sustainability to regenerative futures noting adaptive reuse and retrofitting existing building stock should form an essential part of a regenerative future framework. The Adelaide Park Lands Management Strategy—Towards 2036 includes regenerative planning principles to help inform future master planning and management of the Adelaide Park Lands.	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Adelaide Park Lands Management Strategy – towards 2036* *Adaptive Reuse City Housing Initiative*	**Support and encourage further investigations** City of Adelaide would welcome future engagement in developing a regenerative planning framework and toolkit, and development of a promotional strategy that encourages implementation of adaptive reuse in other local government areas.
The urban form to deliver the vision	To retain character and to support circular economy and regenerative planning principles, adaptive reuse is another urban form to identify as an opportunity in urban renewal areas. Recognise the primacy of the city centre and that the future urban form relies not only on retrofitting existing low-density neighbourhoods and new communities but unlocking significant growth potential in the CBD.	*City Plan – Adelaide 2036* *Adaptive Reuse City Housing Initiative*	**Change requested** Recommend promoting adaptive reuse in areas of renewal, to retain character and support circular economy and regenerative planning principles. **Key recommendation - Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
People Housing and Liveability			
Outcome 1 – More Housing in the right places	Adaptive reuse can provide an additional mode of housing supply across the existing housing spectrum. Conversion of vacant or underutilised building stock has been identified as one way to deliver more housing in the city where residents can access services, work, education, entertainment and green space.	*City Plan – Adelaide 2036* *Adaptive Reuse City Housing Initiative*	**Change requested** Recommend policy refinements to support and incentivise adaptive reuse as a mode of housing supply. **Key recommendation - Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.**
Future housing land supply	The City of Adelaide supports housing diversity and choice.	*City Plan - Adelaide 2036* *Housing Strategy – Investing in our housing future* *Adaptive Reuse City Housing Initiative* *Code Amendment Program*	**Change requested** Specifically reference CBD development in addition to infill, greenfield and township development (page 32 of the pdf version).
State Significant Infill Areas	This should be reinforced by mapping the whole of the City of Adelaide (excluding the Adelaide Park Lands) in the State Significant Infill Areas mapping layer.	*City Plan - Adelaide 2036* *Housing Strategy – Investing in our housing future*	**Change requested** **Key recommendation - The City of Adelaide (excluding the Adelaide Park Lands) is identified as a State Significant infill area (mapping on page 40 of the pdf version).**
State Significant Infill Areas	The Expert Panel Implementation Program released by the Department of Housing and Urban Development in September 2024 identified that the GARP would provide direction for the City of Adelaide on catalyst sites. The City of Adelaide seeks to progress this policy review as a matter of priority and can assist in the Code Amendment.	*Housing Strategy – Investing in our housing future.* *Code Amendment Program*	**Change requested** New Action Review and refine catalyst site policies in accordance with the recommendations of the Expert Panel (within 2 years). **Key recommendation - Create an additional Action to undertake a Catalyst Site Policy Review Code**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			Amendment (in accordance with the recommendations of the Expert Panel).
State Significant Infill Areas - Adelaide City section	Support collaborative opportunities that facilitate more affordable housing in the city as this aligns with several City of Adelaide Plans and Strategies. Reference to catalyst site policies in this section does not reflect that the Expert Panel, State Government and the City of Adelaide agree that catalyst site policies need to be reviewed. The City of Adelaide requests this sentence be reworded. An amendment to wording in the lead paragraph is recommended to reflect that essential workers and students can also be permanent residents. In addition, the City of Adelaide has a strategic objective to increase the number of families living in the city which should also be reflected here.	*City Plan - Adelaide 2036* *City of Adelaide Strategic Plan – 2024-2028* *Housing Strategy – Investing in our housing future* *Economic Development Strategy – A thriving economy for all*	**Changes requested** Remove reference to catalyst sites facilitating well planned growth. Include an additional sentence that captures the intent to review and refine policies in the City of Adelaide that addresses concerns about the lack of interface management and local context considerations in the current policy whilst enabling opportunity for innovative, and site-responsive design of larger sites Recommend changing to "Adelaide City is the heart of our state's civic, cultural and commercial life and is a key contributor to infill growth. It will play a more important role in delivering convenient and affordable housing opportunities for all, including essential workers, families and students."
State Significant Infill Areas - Adelaide City section	There is opportunity to unlock dwelling potential through adaptive reuse, however there is a need for longer term investment in adaptive reuse at national, state and local government levels.	*City Plan - Adelaide 2036* *Housing Strategy – Investing in our housing future.* *Adaptive Reuse City Housing Initiative*	**Support** Recommend further investigation into adaptive reuse investment. **Key recommendation - Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.**
State Significant Infill Areas - Adelaide City section	A number of the identified State-Significant Infill Areas are within proximity (400m) to the Adelaide Park Lands and will receive great benefit from this landscape by way of	*Adelaide Park Lands Management Strategy – towards 2036* (draft) *City Plan - Adelaide 2036*	**Support** Opportunity for partnerships **Key recommendation - Master planned and infill sites near the Adelaide Park**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	provision of open space, cooling and opportunities to engage with nature. The *Adelaide Park Lands Management Strategy – Towards 2036* identifies these urban renewal areas as partnership opportunities to ensure that the Adelaide Park Lands can respond to growth both within the City of Adelaide and surrounding Local Government areas. These partnerships will require joint investment from both State and Local Government to ensure that the Adelaide Park Lands continue to be recognised not only for their aesthetic value but also for the social, cultural, heritage, environmental and economic benefits they provide for all South Australians. Consideration also needs to be given to the impacts additional growth will have on infrastructure and service provision within the City of Adelaide.		**Lands provide on-site local open space provision and mechanisms for investment in the Adelaide Park Lands.**
Local Infill Investigations Areas	The long-term strategic objectives and the section on local coordination and delivery aligns with City Plan and Housing Strategy investigations and outcomes. Consider including adaptive reuse as another housing option to be investigated in local area planning (including shop-top housing). The City of Adelaide is not identified for local infill. The mapping could include the development potential sites identified in *City Plan – Adelaide 2036*	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our housing future* *Adaptive Reuse City Housing Initiative*	**Support with change** Include development potential sites in the mapping layer *from City Plan – Adelaide 2036*. Promote shop-top housing/conversion of underutilised spaces for residential uses. **Key recommendation - Incorporate the strategic planning undertaken by the City of Adelaide through City Plan – Adelaide 2036 and associated strategies when finalising the GARP in March 2025, including collaborating on the integration of local area planning outcomes and digital mapping layers.**
Strategic Infill co-ordination and incentives	There is alignment with City of Adelaide City Plan and Housing Strategy, particularly in seeking partnerships with State Government to facilitate master planning, and co-ordination of larger sites.	*City Plan - Adelaide 2036* *Housing Strategy – Investing in our housing future*	**Support with change** Include adaptive reuse as a housing option.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	Whilst the scale of sites in the City of Adelaide may be smaller than in other areas of the region, the same principles apply. Adaptive reuse is another housing option that could be included here.	*Adaptive Reuse City Housing Initiative*	**Key recommendation - Incorporate the strategic planning undertaken by the City of Adelaide through City Plan – Adelaide 2036 and associated strategies when finalising the GARP in March 2025, including collaborating on the integration of local area planning outcomes and digital mapping layers.**
Housing Diversity and Affordability	Long-term strategic objectives are supported. The City of Adelaide seeks to collaborate on policy to facilitate missing middle housing. Some refinements to the objectives are recommended to provide greater opportunities.	*City Plan - Adelaide 2036* *Housing Strategy – Investing in our housing future*	**Support with change** Objective 2 - Include universal design Objective 3 – include partnerships as another mechanism to facilitate affordable and social housing **Key recommendation - Missing Middle housing includes additional housing typologies that apply to the City of Adelaide to encourage diversity and housing choice (pages 77 to 80 of the pdf version).**
Housing Diversity and Affordability	There is an emphasis on increasing the housing supply but greater emphasis should be placed on providing quality living environments, including acknowledgement that quality and sustainable building practices helps facilitate long-term housing affordability. Guidance is needed to ensure that new buildings are designed and built so that they can be adaptable to changes in market demands. For example, serviced apartments, student accommodation and hotel accommodation.	*City Plan - Adelaide 2036* *Housing Strategy – Investing in our housing future* *Code Amendment Program*	**Support with change** Consider as part of future updates to the Planning and Design Code **Key recommendation - Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.**
Housing Diversity and Affordability	The City of Adelaide recommends further investigations and expansion of design considerations for apartments is needed as part of providing certainty and incentives for more diverse housing, including for adaptive reuse (this is	*City Plan - Adelaide 2036* *Housing Strategy – Investing in our housing future* *Code Amendment Program*	**Changes recommended** Further investigations into design of apartments. **Key recommendation - Stronger adaptive reuse policy that provides for**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	in addition to the Accommodation Diversity Code Amendment).		**the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.**
Housing Diversity and Affordability	The City of Adelaide strongly supports the commitment to delivery of more social and affordable houses and affordable rental opportunities, review of affordable housing policies, extension of the Affordable Housing Overlay and affordable housing offset scheme. This will support increased supply of affordable housing to rent or buy that is designed for affordable living and located across the Greater Adelaide Region to be accessible for people in all communities/localities.	*City Plan - Adelaide 2036 Housing Strategy – Investing in our housing future.*	**Support** **Key recommendation – Include a review of the policies in the Affordable Housing Overlay as part of Action 11, and a wholesale review of the Affordable Housing Program as part of Action 12.** **Key recommendation - Consideration is given to an urban renewal area in the CBD where there is a concentration of government land holdings and high ownership by the South Australian Housing Trust.**
Outcome 2 – Liveable, accessible and inclusive communities	The City of Adelaide supports the Living Locally approach	*City Plan – Adelaide 2036*	**Support** Additional emphasis on the CBD could be provided.
Regional Open Space	Support the long-term strategic objectives for regional open space through the introduction of Open Space Principles and the Greater Adelaide Open Space System. Long-term strategic objective 2 could be further developed to acknowledge that the Adelaide Park Lands are National Heritage Listed and include the significant biodiversity contribution to the city and surrounding areas.	*Adelaide Park Lands Management Strategy – Towards 2036*	**Change recommended** Update Objective 2 to acknowledge that the Adelaide Park Lands are National Heritage Listed and are essential for biodiversity conservation, community well-being and ecological health. Consider introducing a 'no-net loss of open space' as a strategy or objective. **Key recommendation - Strengthen and broaden recognition of the role of the National Heritage Listed Adelaide Park Lands within the open space system for its contribution to biodiversity,**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			canopy cover, recreation, tourism and Aboriginal and cultural heritage. **Key recommendation - Master planned and infill sites near the Adelaide Park Lands provide on-site local open space provision and mechanisms for investment in the Adelaide Park Lands.**
Regional Open Space	The concept of Greenways is supported, however the definition of Greenways does not align with current South Australian legislation '*Recreational Greenways Act 2000' which* defines what a 'greenway' is in South Australia and that these must be proclaimed under the Act.	*Adelaide Park Lands Management Strategy – Towards 2036*	**Change recommended** Amend the definition of Greenways to align with the *Recreational Greenways Act, 2000* or the term 'Greenway' should be re-thought to refer to Green Corridors, Wildlife Corridors, Biodiversity Corridors, Recreation Corridors or similar.
Regional Open Space	The reimagining of the existing Metropolitan Open Space System (MOSS) is conditionally supported. The draft Greater Adelaide Open Space Strategy (GAOSS) has not been provided so it is difficult to understand how the Adelaide Park Lands fits within this system and if there are any future expectations on the role in which the Adelaide Park Lands will play for metropolitan Adelaide. It is also unclear if there are any governance or funding linkages between the Adelaide Park Lands and the proposed Northern Park Lands.	*Adelaide Park Lands Management Strategy – Towards 2036*	**Further information is needed** to be able to comment constructively on this approach.
Regional Open Space	The Open Space network – Green Space layer identifies Possum Park / Pirltawardli (Park 1) in the Adelaide Park Lands.	*Adelaide Park Lands Management Strategy – Towards 2036*	**Further information is needed** to be able to comment constructively on this approach. Mapping of the Adelaide Park Lands in the GARP to be subject to future discussions with the City of Adelaide and Kadaltilla/Adelaide Park Lands Authority.
Regional Open Space	Further clarification or guidance is needed in regard to the following:	*City Plan – Adelaide 2036*	**Clarification and changes recommended**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	• A definition of 'open space' to clarify that it may also include 'hard spaces' such as plazas and it is not only 'green space'. • Guidance on the development of local open space planning from the Office for Recreation, Sport and Racing or ODASA would allow neighbouring Councils to consider Open Space supply and demand holistically and more strategically. • The Greater Adelaide Park Lands and the Greater Adelaide Open Space System. • Clarify the definition of Public Space – this should refer to all open space that is publicly accessible. • Local Open Space Targets should be explored to support increased access to Open Space for communities. This will provide spaces to reach the tree canopy targets.	*Adelaide Park Lands Management Strategy – Towards 2036*	Ensure clarity and consistency Update or provide definitions **Key recommendation - Strengthen and broaden recognition of the role of the National Heritage Listed Adelaide Park Lands within the open space system for its contribution to biodiversity, canopy cover, recreation, tourism and Aboriginal and cultural heritage.** **Key recommendation - Master planned and infill sites near the Adelaide Park Lands provide on-site local open space provision and mechanisms for investment in the Adelaide Park Lands.**
Aboriginal cultural and heritage values	This section is supported but could be further expanded to provide long-term strategic objectives to develop Caring for Country Frameworks, Designing with Country Frameworks and Healthy Country Plans. Cultural mapping of Aboriginal heritage and value should also be expanded to include investigations into an Aboriginal Heritage overlay in the Planning and Design Code.	*City Plan – Adelaide 2036* *Adelaide Park Lands Management Strategy – Towards 2036* *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Support with change** Expand scope of Action 9
State and Local Heritage	Commend the inclusion of the UNESCO World Heritage Listing Bid for Adelaide and its Rural Settlement Landscapes. However, it is noted that there is no specific action associated with this bid. The UNESCO World heritage listing bid is a Strategic Priority in the Draft - *Adelaide Park Lands Management Strategy - Towards 2036*. This requires a partnership approach between the State Government and Local Government.	*Heritage Strategy* *City Plan – Adelaide 2036* *Adelaide Park Lands Management Strategy – Towards 2036* *Kadaltilla / Adelaide Park Lands Authority Strategic Plan*	**Change recommended** New Action Identify an action to promote/support the UNESCO World Heritage Listing Bid Include the opportunity for State Heritage Listing of the Adelaide Park Lands and City Layout in the GARP. **Key recommendation - Strengthen the application and consideration of**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	State Heritage Listing of the Adelaide Park Lands and City Layout is also a Strategic Priority in the *Adelaide Park Lands Management Strategy - Towards 2036* and should be included in the GARP as a strategic objective as this would support the UNESCO bid.	*National Heritage Management Plan for the Adelaide Park Lands and City Layout*	**heritage policies at all levels of assessment including reference to opportunities for State Heritage listing of the Adelaide Park Lands to support Council's goal in achieving World Heritage listing, and recognition and management of the impact of infill on built heritage.**
State and Local Heritage	Long-term strategic objective 1 needs to apply to development assessed by the State Commission Assessment Panel. An additional action is suggested to ensure heritage considerations for development assessed at this level.	*Heritage Strategy* *City Plan – Adelaide 2036*	**Change recommended** New Action That PLUS provides independent heritage advice to SCAP and be available to provide responses at SCAP meetings.
State and Local Heritage	The long-term strategic objectives are recommended to be strengthened and amended as follows: • Stronger language is needed around contextually responsive development adjacent development and zoning that retains heritage values. • Embed State-level planning protections for National Heritage Places	*Heritage Strategy* *City Plan – Adelaide 2036* *National Heritage Management Plan for the Adelaide Park Lands and City Layout*	**Change recommended** Review and amend objectives: • The words 'sympathetic', 'appropriate' need to be used in sentences relating to development and adaptive reuse. • Add ‘and protect’ to Objective 6. **Key recommendation - Strengthen the application and consideration of heritage policies at all levels of assessment including reference to opportunities for State Heritage listing of the Adelaide Park Lands to support Council's goal in achieving World Heritage listing, and recognition and management of the impact of infill on built heritage.**
State and Local Heritage	Further acknowledgement is needed of the impacts of housing and growth targets on the planning policy framework that applies to heritage places and areas.	*Heritage Strategy* *City Plan – Adelaide 2036*	**Clarification requested** An additional action may be needed to recognise and investigate any changes needed – consideration should be given

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			to Historic Area Overlays, Building Style Guidelines, Extent of listing, curtilage, buffers etc
Landscape and Neighbourhood Character	In general, the long-term strategic objectives are supported and are in alignment with *City Plan – Adelaide 2036*, in particular Strategy 8 – Designing for Urban Life, Diversity and Density	*City Plan – Adelaide 2036*	**Support**
Landscape and Neighbourhood Character	The Long-term Strategic Objectives should include the Adelaide Park Lands as a landscape of high scenic quality that is safeguarded by legislation - *Adelaide Park Lands Act 2005* as well as recognising their regional and national significance.	*City Plan – Adelaide 2036* *Adelaide Park Lands Management Strategy – Towards 2036* *National Heritage Management Plan for the Adelaide Park Lands and City Layout*	**Changes recommended** Objective 3 should include in the long-term strategic objectives the protection of the Adelaide Park Lands landscapes, views and vistas. Insert new Objective 8. Retain the special qualities of the Adelaide Park Lands whilst recognising their regional and national significance.
Landscape and Neighbourhood Character	Support for demolition controls based on replacement building approval.	*Planning System Implementation Review Submission* *Code Amendment Program*	**Change recommended** Consider review of demolition controls in Historic Areas in addition to Character Areas.
Productive Economy			
Employment Lands	Recognition of the City of Adelaide's capital city role and large contribution to the State economy is needed. Complementary growth is supported whilst ensuring that investment is viable and supportive of the city's growth and investment aspirations. The continued clustering of economic activity in the city is paramount to the other growth aspirations across the state. The Employment map provides no context, detail or significance of the city as a key element to the State's growth.	*Economic Development Strategy – A thriving economy for all* *City Plan – Adelaide 2036*	**Changes Recommended** Request additional context about the important role of the capital city in the region. Insert new Objective 6 - Maintain and enhance the City of Adelaide's role in growth, and investment attraction and supporting a thriving, dynamic economy. Replace the content under Adelaide Central Business District (CBD)

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			Employment Lands heading with the following: *The City of Adelaide is at the heart of the Greater Adelaide region. It is the CBD, the economic epicentre, cultural core, higher education hub, centre of transit and supports liveability for all Greater Adelaide. The primacy of the city centre in Greater Adelaide has an important role in leading the direction of and supporting the growth of South Australia.* *As South Australia's state capital, Adelaide is a major employer and economic driver, representing 18% of South Australia's GSP and generating Gross Regional Product (GRP) of around $23.95 billion (2022–23).* *The city provides opportunities for business growth and amenities in the public realm, attracting the skilled workers that will further grow businesses and increase population in Greater Adelaide.* *World class facilities add to the city's attraction. The city hosts the Biomedical Precinct, Lot Fourteen Innovation Precinct as well as premier destinations for learning, entertainment, recreation and sporting activities.* *The Nationally Heritage Listed Adelaide Park Lands and Squares provide space for festivals and events whilst simultaneously increasing the city's biodiversity and sustainability. The Adelaide Park Lands are a major recreational, sporting and tourism destination, providing an open space that connects the city to the surrounding*

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			suburbs. They are also home to the Adelaide Botanic Gardens and Botanic Park/Tainmuntilla.
Employment Lands	The City of Adelaide recognises and supports the alignment of Long-term Strategic objectives 3 and 5 with the outcomes anticipated in City Plan.	*City Plan – Adelaide 2036*	**Support**
State Innovation Places	The City of Adelaide supports the focus on State Innovation Places and welcomes opportunities to partner and promote the important city-based innovation places, Lot Fourteen and BioMed City and their links to the city-based universities. The City of Adelaide also notes the release of South Australia's Innovation Places Leadership Framework 2024-2034 and the Lot Fourteen Master Plan 2024.	*Economic Development Strategy – A thriving economy for all*	**Support**
Activity Centres and Retail	Recognition of the CBD is supported.	*City Plan – Adelaide 2036*	**Change recommended** Amendments to acknowledge that within the City of Adelaide there are a number of main street activity centres that function at a similar level to local and neighbourhood activity centres. Recognise the primacy of the CBD for retail.
Activity Centres and Retail	The City of Adelaide recommends that further investigations and recognition of the importance of the nighttime economy, including planning for city's use at night by residents and workers, not only for activities related to hospitality and visitor economies.	*Economic Development Strategy – A thriving economy for all*	**Changes recommended** Undertake further investigations on the night-time economy and reflect in the final GARP.
Tourism and Events	The City of Adelaide as the capital city should be included in this section as a key tourist zone in the opening sentence. Specific tourist attractions should be mapped - particularly those of State and Regional significance.	*Economic Development Strategy – A thriving economy for all*	**Change recommended** Recognise the CBD as 'More than the gateway to South Australia' (as per the City of Adelaide Economic Development Strategy).

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			Increase the profile of the City of Adelaide as a tourist destination for recreation as well as an important destination for business events. Potential to expand the mapping to include key tourist attractions, including - Adelaide Oval, Adelaide Zoo, Botanic Gardens, Adelaide Park Lands.
Waste and Resource Recovery	Long-term strategic Objectives 3 and 4 align with a number of City of Adelaide strategies and plans.	*City Plan – Adelaide 2036* *Economic Development Strategy – A thriving economy for all* *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Adaptive Reuse City Housing Initiative*	**Support**
Waste and Resource Recovery	Given the significant housing growth proposed, with a focus on higher-density housing options, an additional strategic objective is recommended that ensures high and medium-density housing is designed to provide space for waste management / resource recovery systems and storage on site.	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Code Amendment Program*	**Change recommended** New Objective Include an additional strategic objective to ensure new developments, particularly multi-unit dwellings are designed to provide space for at minimum 3-stream waste management / resource recovery systems and storage on site.
Waste and Resource Recovery	In addition to promoting adaptive reuse and designing new buildings for adaptability and/or disassembly, as part of the role of the planning system, greater importance needs to be placed on waste management plans and resource recovery of new building sites. This should be captured in the Waste Recovery section. It is recommended that this section acknowledge that the circular economy is much more than waste management	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Economic Development Strategy – A thriving economy for all*	**Change recommended** Review language and update.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	facilities. It is about systems and how they are interconnected so wider consideration is needed. A review of language is recommended to reflect more proactive terminology – i.e. 'circular economy', rather than 'waste recovery' which is considered reactive. The City of Adelaide supports recognition of the role of adaptive reuse in reducing greenhouse emissions but recommends expanding this statement to reference broader circular economy outcomes including material choice and connection to waste management facilities. In addition, space is needed to build the industries that will support collection/aggregation of materials for various outcomes like reuse, repair, sharing, repurposing and processing materials for recycling - not just management of the waste. Rather than an economic growth opportunity, it is suggested that waste management is becoming an economic development opportunity.		
Environment Resources Landscape			
Biodiversity	The strategies for Biodiversity are supported with opportunity for further alignment with City of Adelaide strategies.	*Adelaide Park Lands Management Strategy - Towards 2036 – Draft* *City Plan – Adelaide 2036* *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Support with changes** Acknowledge the relationship between the natural landscapes and their traditional owners and include strategies or objectives to include cultural burning into the management of the natural landscapes. Embed (rather than investigate how to embed) Biodiversity Sensitive Urban Design
Climate change	The long-term strategies for climate change are supported, however strengthening wording from 'consider' and 'encourage' to 'ensure' and 'support' is required especially when referring to decarbonising master planned neighbourhoods and investment in existing neighbourhoods, as well as avoiding carbon-based	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Housing Strategy – Investing in our housing future*	**Change recommended** Review and update language.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
	energy supplies and ensure adequate public transport, walkability and active travel. The City of Adelaide's *Integrated Climate Strategy 2030* aims to triple the number of workers who cycle to work and double the number of local residents who walk to work; and aims for all home and business to be electrified and powered by renewables by 2030. As at the State-level, transport is now the largest contributor to the City of Adelaide community's climate impact. Carbon emissions from transport have increased 71% from FY2020 to FY2024, driven by private vehicle travel to and from the city, requiring an interconnected approach to support public and active transport beyond the CBD.		
Climate change	There is an opportunity to reiterate circular economy principles and language in reference to public realm elements and public infrastructure – for example through procurement decisions that localise supply, prioritise reuse and drive green industries	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Change recommended** Review and update language.
Urban Greening and Cooling	Support the strategies for urban greening and cooling, however, these particularly focus on public realm cooling, whereas it is known that cooling of homes is critical to ensure comfort and affordability of running costs. The current tree policy work has a suburban focus, and further collaboration is required relating to establishing tree canopy in the CBD. The City of Adelaide Integrated Climate Strategy 2030 aims for a cool city with no urban heat island effect facilitated by shading and materials changes and greening that is supported by sustainable water resources.	*City Plan – Adelaide 2036* *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Change recommended** Recommend an additional strategy relating to thermal comfort inside homes. Establish specific tree policy for the city context.
Emissions and Hazardous Activities	Support for the strategies.	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Support**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Transport & Infrastructure			
Outcome 5: An integrated and connected region	Many cities internationally set a clear intent to provide accessibility for children (to school, shops, playground, open space) and this would be welcomed.	*City Plan – Adelaide 2036*	**Changes recommended** Consider refinements to language to reflect the people and communities that land use planning will support.
Outcome 5: An integrated and connected region	Relevant transport layers should be inserted in the GARP to enable strategic coordination and delivery which will be further detailed though the State's Transport Strategy for South Australia and the City of Adelaide's updated Integrated Transport Strategy.	*City Plan – Adelaide 2036*	**Changes recommended** Administration will provide the GIS-compatible layers.
Strategic Transport Networks	There is positive reference to coordination of land use and transport planning which should be evident along corridors through planning for mass public transport.	*City Plan – Adelaide 2036* *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Change recommended** Amend Strategy 1 as below: Residential and employment growth areas are sequenced and planned, to integrate and capitalise on existing and planning strategic transport infrastructure."
Strategic Transport Networks	The Strategies should identify the importance of new development supporting the transition to low-carbon transport through adequate facilities such as storage and charging of e-bikes, e-vehicles, micro mobility, as well as providing opportunities for shared vehicle options in high-density areas to reduce the cost of living and the need for private vehicle storage and ownership.	*City Plan – Adelaide 2036* *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Changes recommended** Amend Strategy 4 as below: Support the increased use of a wider variety of low emission transport modes including public transport, micro mobility, shared vehicles, walking and cycling to reduce the reliance on private vehicles. Amend Strategy 5 as below: Support an efficient transport system that contributes to reducing emissions and active travel for healthy communities.
Strategic Transport Networks	City Shaping infrastructure includes the City Loop and Tram connecting North Adelaide and the City and active transport investments.	*City Plan – Adelaide 2036*	**Changes recommended** Greater focus on Light Rail and alternative public transport modes.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
		Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable	
Local Transport Networks	It is recommended that the Strategies be strengthened to include greater reference to Living Locally principles that underpin the GARP.	*City Plan – Adelaide 2036*	**Changes recommended** Review language to strengthen links to Living Locally principles.
Local Transport Networks	Strengthen policy support for people with a disability and people who have lower levels of mobility, as well as end-of-trip facilities for active transport.	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Change recommended** Amend Strategy 6 as below: Growth areas to provide a local road network and urban form (such as storage for personal mobility devices, bikes and e-bikes) to support active travel.
Social Infrastructure	Define social infrastructure in consideration in infrastructure schemes.	*City Plan – Adelaide 2036*	**Changes recommended** Refer to State Development Co-ordination and Facilitation Bill.
Social Infrastructure	Recreation and sports facilities are key social infrastructure but also relate to open space. Further State-level guidance for Local Government on preparation of Local Sport and Recreation Plans would assist Councils in the prioritising and investment for sport infrastructure planning and highlight the role of significant open spaces, such as the Adelaide Park Lands.	*Adelaide Park Lands Management Strategy – Towards 2036*	**Change recommended** Recommend that a State-wide sporting infrastructure plan be developed to guide Local Government sport and recreation infrastructure planning. This may include indoor sport and recreation facilities in the CBD.
Energy	Demand reduction through passive design, retrofitting and adaptive reuse of existing buildings and compact walkable urban forms will play a large role in playing our part in the global effort to halt climate change and support a net zero city. Electrification is also key in South Australia where we have the world's leading variable renewable electricity grid.	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Investing in our Housing Future – Housing Strategy*	**Change recommended** New Strategy: Support low-carbon energy systems by ensuring developments reduce energy demands through passive building design, adaptable designs and support low-carbon transport options. New Strategy

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
			Preference electrification for all existing and new developments where technology permits.
Infrastructure Reserves and Corridors	The City of Adelaide has experienced a number of pressures on the Adelaide Park Lands for infrastructure such as health, education and police facilities rather than regional open space. Accordingly, any land banking and allocation to support infrastructure demands are welcomed to ensure coordination of growth and infrastructure provision.	*Adelaide Park Lands Management Strategy – Towards 2036*	**Support**
Delivery and Implementation			
Target 1 Residential land supply	Most of the current city zoning includes opportunity for residential development. The City of Adelaide has identified sufficient capacity for anticipated residential growth with current zoning.	*City Plan – Adelaide 2036*	**Support**
Target 2 Regional and Local Area Housing	CoA is not included in a Land Supply Region. The City of Adelaide has housing targets that exceed the annual targets sought through the draft GARP.	*Housing Strategy – Investing in our housing future*	**Support** The City of Adelaide encourages that this target includes diversity targets, and/or ensure measurement of homes built also captures housing type, housing size and tenure type.
Target 3 Employment Land Supply	Current zoning in the city facilitates employment without any changes required. Increased employment growth can occur in the city through densification rather than requiring land rezoning.	*City Plan – Adelaide 2036* *Economic Development Strategy – A thriving economy for all*	**Support**
Target 4 Urban Tree Canopy	By 2030 all local government areas to increase tree canopy (3m or >) cover by 2% over residential and open space areas (excluding industrial and infrastructure). The City of Adelaide has set tree canopy targets. Currently there is 33% canopy cover in streets and parks up from 27.6% in 2022.	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Support** CoA encourages separate consideration and targets for government and private land.

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Action Table - The City of Adelaide acknowledges the 37 actions that will be taken to deliver the GARP outcomes. The following actions are applicable to the CoA (coastal and greenfield/township actions etc are excluded)			
Short Term Actions	An adaptive reuse planning framework and toolkit (like the proposed regenerative planning framework and toolkit) and development of a promotional strategy that encourages implementation of adaptive reuse is recommended.	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our Housing Future* *Adaptive Reuse City Housing Initiative*	**Change requested** New Action: Formalise an adaptive reuse planning framework and toolkit and develop a promotional strategy that encourages implementation of adaptive reuse. **Key recommendation - Stronger adaptive reuse policy that provides for the mandatory design of buildings for future alternative uses, supported by an adaptive reuse planning framework and toolkit.**
Action 1 – Strategic Sites	The City of Adelaide supports the proposed investigations and welcomes the opportunity to assist the State Government's investigations. It notes previous advice to the State Planning Commission that the Council does not support existing catalyst site policy and seeks to review the definition and policy for strategic sites.	*City Plan – Adelaide 2036* *CoA Code Amendment Program*	**Support** **Key recommendation - The City of Adelaide (excluding the Adelaide Park Lands) is identified as a State Significant infill area (mapping on page 40 of the pdf version).**
Action 4 – Local Government Strategic Planning	*Local Governments to undertake strategic planning for their local area to plan for the implementation of housing and employment growth targets and identify infrastructure requirements (2 years).* The City of Adelaide has finalised the following strategies and plans in the past 12 months. • City Plan – Adelaide 2036 • Housing Strategy • Economic Development Strategy • Integrated Climate Strategy • Homelessness Strategy	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our Housing Future* *Economic Development Strategy – A thriving economy for all* *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Homelessness Strategy – Everyone's Business*	**Change requested** **Key recommendation - Incorporate the strategic planning undertaken by the City of Adelaide through City Plan – Adelaide 2036 and associated strategies when finalising the GARP in March 2025, including collaborating on the integration of local area planning outcomes and digital mapping layers.**

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	• Social Infrastructure Assessment Investigations are currently underway for an Integrated Transport Strategy and a Social Infrastructure (Assets) Policy to be finalised in 2025. Together these plans and strategies fulfil Council's obligations under Action 4.	*Social Infrastructure Assessment*	
Action 6 – Code Amendment to increase building heights in the CBD	*City Plan – Adelaide 2036* should be used to guide where building heights are reviewed and to what extent. This will ensure that the development potential created, through increased building heights, matches the spatial outcomes identified in *City Plan – Adelaide 2036* and that the land economics do not adversely impact on development and infrastructure outcomes in the city. The 'Missing Middle' concept also applies to the city. City of Adelaide would also like to explore whether there are areas of the city where heights could be reviewed (increased and/or decreased). Research undertaken through the development of the Housing Strategy and the City Plan suggests that alternate housing models are more likely to be achieved where the policy supports medium-rise development.	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our Housing Future* *Economic Development Strategy – A thriving economy for all*	**Support** The City of Adelaide seeks to collaborate on this Code Amendment to ensure alignment with *City Plan – Adelaide 2036*.
Action 7 – Code Amendment and Policy Review for Urban Corridors	While not specifically relevant to the City of Adelaide this policy review relates to similar issues raised by the City of Adelaide about catalyst site policies (5 years).	*City Plan – Adelaide 2036* *Planning System Implementation Review*	**Change requested** **Key recommendation - Create an additional Action to undertake a Catalyst Site Policy Review Code Amendment (in accordance with the recommendations of the Expert Panel).**
Action 11 – Affordable Housing Overlay	City Plan – Adelaide 2036 and the Housing Strategy – Investing in our housing future both seek greater provision of affordable housing within the city.	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our Housing Future* *Code Amendment Program*	**Change requested** **Key recommendation - Include a review of the policies in the Affordable Housing Overlay as part of Action 11, and a wholesale review of the Affordable Housing Program as part of Action 12.**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Action 12 – Affordable Housing Offset Scheme	The development of an Affordable Housing Offset Scheme is supported in principle, and the City of Adelaide would welcome the opportunity to work with the State Government on the development of the Scheme to ensure that outcomes are delivered in proximity to the main development sites. The City of Adelaide recommends a review of the Affordable Housing program as part of the development of an Offset Scheme as the current program, where the majority of affordable housing products are only available off the plan, is not achieving the desired outcome.	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our Housing Future* *Code Amendment Program*	**Change requested** **Key recommendation - Include a review of the policies in the Affordable Housing Overlay as part of Action 11, and a wholesale review of the Affordable Housing Program as part of Action 12.**
Action 13 – Governance and Funding Models for Regional Open Space	A new funding and governance arrangement for the Adelaide Park Lands would need to result in new or additional funding pathways to support the enhancement and protection of the Adelaide Park Lands. There is a need for Capital Investment to align with the *Adelaide Park Lands Management Strategy – Towards 2036* and priorities of Council for the Adelaide Park Lands and Squares. This should take into consideration the important role that the Adelaide Park Lands play and the significant commitment and contribution the City of Adelaide has in place for the Adelaide Park Lands. Significant opportunities exist to review the funding of the Adelaide Park Lands, including through mechanisms such as: Adelaide Park Lands Fund (Part 5 of the *Adelaide Park Lands Act 2005*) Investigate the establishment of an Adelaide Park Lands Open Space Off-set Scheme through the *Planning, Development and Infrastructure Act 2016* Yearly allocation from the Planning and Development Fund.	*City Plan – Adelaide 2036* *Adelaide Park Lands Management Strategy – Towards 2036*	**Further information required** Any changes to the funding or governance of the Adelaide Park Lands must be undertaken in consultation with Kadaltilla/Adelaide Park Lands Authority and the City of Adelaide.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Action 16 – Biodiversity Mapping	The City of Adelaide has recently undertaken a Biodiversity Survey of the Adelaide Park Lands which includes detailed spatial mapping and a Technical Findings Report that highlights the important role the Adelaide Park Lands play to biodiversity, including identifying rarely-recorded and threatened species. 15.8% of the Adelaide Park Lands are managed as Key Biodiversity Areas.	*Adelaide Park Lands Management Strategy - Towards 2036* *Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable*	**Change recommended** Include areas of high Biodiversity in the spatial mapping of the GARP that fall outside of national parks and native vegetation areas – e.g. Adelaide Park Lands. Add a Strategy or Action to investigate a biodiversity Overlay in the Planning and Design Code.
Action 21 – Pilot Infrastructure Scheme	The City of Adelaide encourages the implementation of infrastructure schemes across the state to ensure that value is captured from rezoning to enable infrastructure to be sequenced with the delivery of new housing.	*City Plan – Adelaide 2036*	**Support**
Action 22 – State Transport Strategy	The City of Adelaide supports the development of the State Transport Strategy and welcomes the opportunity to provide feedback when it is released for public consultation.	The City of Adelaide is preparing an Integrated Transport Strategy for finalisation in 2025.	**Key recommendation - The City of Adelaide seeks a further round of consultation on the draft GARP once key State Government strategic documents are available and incorporated into the GARP.**
Action 25 – Social Infrastructure Benchmarks	Social Infrastructure Benchmarks are applicable across all areas, not just growth areas, given the infill potential in existing suburbs. The City of Adelaide has undertaken a Social Infrastructure Assessment, including benchmarking of key social infrastructure. The City of Adelaide would welcome the opportunity to assist in informing the development of benchmarks and the implementation of a scheme of measurement.	*Social Infrastructure Assessment* *GARP Discussion Paper submission*	**Support** An agreed definition of social infrastructure is also recommended to be developed.
Action 27 – Infill Design Guidelines	The City of Adelaide recommends that the timeframe for the development of these Guidelines is brought forward to support anticipated growth.	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our Housing Future*	**Support** Bring forward the timeline for implementation.

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Action 28 – General Infill Design Quality	Design-quality guidance is needed in the Planning and Design Code as a matter of high priority relating to all housing types, particularly medium and high-density, including for new 'missing middle' housing forms and apartments. The Code Amendment should include adaptive reuse opportunities and waste-management design policies for all forms of housing.	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our Housing Future*	**Support** Bring forward the timeline for implementation.
Action 30 – Adaptive reuse of heritage places	The City of Adelaide advocated for this outcome in our submission to the GARP Discussion Paper.	*City Plan – Adelaide 2036* *Housing Strategy – Investing in our Housing Future* *Adaptive Reuse City Housing Initiative* *GARP Discussion Paper submission*	**Support**
Action 33 – Land Supply Dashboard – Employment and Infrastructure Reporting	Updates to the Land Supply Dashboard to provide greater transparency and reporting on land supply and infrastructure provision.	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Adaptive Reuse City Housing Initiative*	**Support**
Action 35 – Urban Tree Canopy Overlay	This action does not propose any changes to application of the Overlay within the City of Adelaide; measures to increase urban tree canopy across the region are supported.	*City Plan – Adelaide 2036*	**Support**
Action 37 – Regenerative Toolkit	Support moving beyond sustainability to regenerative future.	*Integrated Climate Strategy 2030 – Resilient, Protected, Sustainable* *Adelaide Park Lands Management Strategy – Towards 2036*	**Support**

GARP Section	City of Adelaide Administrative Comment	City of Adelaide Alignment	Recommendations and Opportunities
Greater Adelaide Land Supply Regions Adelaide City	The introduction to 'Adelaide City' should include reference to the National Heritage-listed Adelaide Park Lands, that provide significant quality open space to the city and surrounding suburbs; and recognise that housing diversity in the City is more than purpose-built student accommodation.	*Adelaide Park Lands Management Strategy – Towards 2036* *City Plan – Adelaide 2036*	**Change requested** Refine description of Adelaide City with the City of Adelaide.

Digital Mapping

A key element of City Plan is the digital explorer (CoADE) that includes over 400 data layers of spatial information. The City of Adelaide sees an opportunity for some of these layers to be included in the GARP.

Technical/Editorial comments

- References to City of Adelaide as the Local Government Area need to be clearly differentiated from Metropolitan Adelaide or Greater Adelaide.
- *Figure 41 - Population projection for City of Adelaide LGA* uses has incorrect population numbers.
- The map icon of the CBD should be located near King William Street and Rundle Mall to better reflect the CBD location.
- References to the Adelaide Park Lands need to be checked for consistency throughout.
- The user experience of the Digital Portal would be improved with the ability to do comprehensive 'word searches'.
- Adelaide City - Infrastructure considerations – remove the word Kadaltilla from paragraph 6 – this is an incorrect reference.

Festival Plaza Code Amendment Consultation Submission

Strategic Alignment - Our Places

Public

Tuesday, 5 November 2024

City Planning, Development and Business Affairs Committee

Program Contact:
Sarah Gilmour, Associate Director Park Lands, Policy & Sustainability

Approving Officer:
Ilia Houridis, Director City Shaping

EXECUTIVE SUMMARY

The purpose of this report is to seek endorsement of a submission to the Chief Executive of the State Government Department for Housing and Urban Development on the Festival Plaza Code Amendment (the Code Amendment) that is on interim operation and open for consultation until 24 October 2024 (Link 1).

The City of Adelaide has notified Planning and Land Use Services that Council's formal submission will be made following the Council decision on 12 November 2024.

The Code Amendment proposes to amend the City Riverbank Zone and Entertainment Subzone to facilitate the redevelopment of Festival Plaza. The Code Amendment removes existing building height restrictions and includes a new Concept Plan to guide the location of new buildings in relation to Parliament House and the Adelaide Festival Centre.

The City of Adelaide's draft submission includes consideration of the National Heritage Management Plan and impacts on the National Heritage Listed Parliament House, Adelaide Park Lands and City Layout, outcomes identified in the City Plan, and public spaces.

The City of Adelaide's submission is also informed by the submission on the Code Amendment by the Kadaltilla / Adelaide Park Lands Authority endorsed at its meeting held on 24 October 2024.

Based on the above considerations the draft submission does not support the Code Amendment and recommends the following changes to mitigate development impacts, and show greater regard for State Planning Policy 2 – Design Quality and State Planning Policy 7 – Cultural Heritage, if the State Government chooses to proceed with the Code Amendment:

- Reduce the maximum building height to less than the height of the 29 level Festival Tower 1.
- Increase the setbacks from Parliament House to increase visibility to the State Heritage Place and retain valuable public space.
- Emphasise public realm outcomes including canopy and greening, pedestrian wayfinding and connectivity, and street-level design to make a positive contribution to its setting, disability access, and safe night-time use for an area of the city that interfaces with cultural institutions, festivals and events.
- Provide an exemplar architectural response in built form noting the position any future new buildings to Parliament House and the Adelaide Festival Centre and the view of the city and its skyline from Adelaide Oval and Elder Park, incorporate principles of ecologically sustainable development, including a fully electric development, and open-ground plane that improves surveillance to the laneways to the north and west of Parliament House for greater alignment with State Planning Policy 2 – Design Quality.
- Identify views to the Adelaide Park Lands on the Concept Plan.
- Identify the building heights in the policy as well as on the Concept Plan (currently indicated as 40 levels).

RECOMMENDATION

The following recommendation will be presented to Council on 12 November 2024 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the submission to the Chief Executive Officer of the Department for Housing and Urban Development on the Festival Plaza Code Amendment as contained in Attachment A of Item 7.3 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024.

2. Authorises the Chief Executive Officer, or delegate, to make minor technical or typographical amendments to the submission on the Festival Plaza Code Amendment as contained in Attachment A of Item 7.3 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024 for the purposes of finalising and lodging the submission.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Places Encourage bold, interesting and purposeful development
Policy	The recommendation proposed in this report aligns with the City Plan – Adelaide 2036, National Heritage Management Plan for the Adelaide Park Lands and City Layout, and draft Adelaide Park Lands Management Strategy – Towards 2036.
Consultation	This report responds to a consultation process being undertaken by the Chief Executive Officer of the State Government Department for Housing and Urban Development in relation to a State-led amendment to the Planning and Design Code (Code Amendment).
Resource	Not as a result of this report
Risk / Legal / Legislative	Not as a result of this report
Opportunities	To align Planning and Design Code policies with Council policy relating to the Adelaide Park Lands, National Heritage Management Plan and City Plan.
24/25 Budget Allocation	Not as a result of this report
Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	The Code Amendment commenced operation on an interim basis on 12 September 2024. The policies proposed in the Code Amendment apply for 12 months from the date of commencement or until they are adopted (or otherwise) by the Minister for Planning.
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

Background

1. The State Government has prepared a Code Amendment to revise planning policy applying to Festival Plaza within the City Riverbank Zone of the State Government's Planning and Design Code. The Code Amendment is referred to as the Festival Plaza Code Amendment.
2. A submission to the Code Amendment is being made as part of the City of Adelaide's Code Amendment program which includes Code Amendments led by Council and submission to relevant State-led Code Amendments.
3. The Code Amendment is open for consultation until 24 October 2024. The City of Adelaide has notified Planning and Land Use Services that Council's formal submission will be made following the Council decision on 12 November 2024.
4. The Code Amendment commenced operation on an interim basis on 12 September 2024. The policies proposed in the Code Amendment apply for 12 months from the date of commencement or until they are adopted (or otherwise) by the Minister for Planning.
5. The Affected Area is within the Entertainment Subzone of the City Riverbank Zone. The Subzone currently allows buildings of unlimited height, subject to buildings taller than 20 levels being of exemplary design and not located adjacent to the River Torrens / Karrawirra Pari.
6. The Code Amendment seeks to remove the 'deemed to satisfy' height of 20 levels and introduces a new Concept Plan to guide the location of new built-form relative to Parliament House and the Adelaide Festival Centre with a nominated height of 40 building levels.
7. The Entertainment Subzone currently seeks a prominent, vibrant and safe public plaza that provides a focal point for the Riverbank precinct and is supported by a vibrant mix of land uses that encourage use by city workers, residents, families, students, youth, children and tourists.
8. The area affected by the Code Amendment and the proposed Concept Plan are reproduced from the consultation documents below:



Figure 2: Affected Area Festival Plaza Code Amendment



9. The Code Amendment has been approved for early commencement to prevent development applications contrary to its intent from being lodged while the policy changes are being consulted.
10. The Code Amendment states the rationale for the amendment is to ensure that the policy in the Entertainment Subzone is consistent with and supports the State Government's vision for the Riverbank Precinct and Festival Plaza Redevelopment Project.

11. The Code Amendment does not consider specific proposed developments but would provide building height and design guidance for any future development in Festival Plaza as part of the Festival Plaza Redevelopment Project by the State Government.

12. Whilst a formal development application has not been submitted, in April 2024 the Premier announced that *"A sleek, modern 38-storey high-rise tower is set to be built in Festival Plaza, with significant additional public space - bringing in thousands of visitors and workers and more than $1 billion in annual economic activity."*

13. A draft submission on the Code Amendment has been prepared (**Attachment A**) based on relevant Council plans and investigations as detailed below and is also informed by the submission prepared by Kadaltilla / Adelaide Park Lands Authority.

City Plan – Adelaide 2036

14. Council endorsed its City Plan – Adelaide 2036 on 10 September 2024.

15. The Festival Plaza is within the North Terrace Local Area of the City Plan which is envisaged as the cultural, institutional and governance heart of South Australia.

16. Development of the scale facilitated through the Code Amendment is not envisaged within this Local Area, with growth primarily anticipated on the south side of North Terrace.

17. Key place principles include:

    17.1. Public spaces are accessible and well-defined with active and visually permeable frontages to create a sense of address, destination and identity at pedestrian level particularly on the northern side of North Terrace west of King William Street.

    17.2. Retain the prominent views of the significant National Heritage and State Heritage Places.

    17.3. High quality contemporary and innovative architecture that is respectful of the local area's Heritage Places, Adelaide Park Lands character and civic uses.

    17.4. On the northern side of North Terrace, where there are long range views from North Adelaide, Montefiore Road, Memorial Drive, Adelaide Oval and North Terrace, buildings should be designed to address all frontages and be viewed from all sides with open spaces between adjoining buildings.

    17.5. Leverage significant investment into the northern side of North Terrace to reinforce its role as the premier cultural and institutional boulevard. This includes prioritising pedestrian amenity and safety to take advantage of the significant and growing event infrastructure including to:

        17.5.1. Regenerate the existing carpark under the southern plaza along Festival Drive to address its structural and functional deficiencies and reinforce its sense of safety for public use as a high-quality space to help reinforce the area as an entertainment hub.

18. Strategy 8 – Designing for Urban Life, Diversity and Density of the City Plan, introduces the city-wide place principle to transition height around heritage built-form interfaces to ensure that new developments respect and complement existing architectural character.

19. The view analysis in the Code Amendment suggests a taller building height for Tower 2 will demonstrate clustering with Tower 1 when viewed from the footbridge. The City of Adelaide submits the second tower should respond to the dominant height of Tower 1 rather than being the dominant height.

National Heritage Values

20. The National Heritage Management Plan for the Adelaide Park Lands and City Layout (NHMP) identifies:

    20.1. The Adelaide Park Lands and City Layout as highly sensitive to new developments within or adjacent to the National Heritage Place, and inappropriately designed developments threaten its conservation values.

    20.2. The Adelaide Park Lands' views and vistas as important elements of the appreciation, understanding and enjoyment of the National Heritage Values, and are often affected by inappropriate development within or adjacent the boundary of the heritage place.

    20.3. The 2020 *Adelaide Park Lands Building Design Guidelines* as a guide for all building development in the Adelaide Park Lands as they establish expectations for design quality.

21. The City of Adelaide submits that the Code Amendment will unreasonably impact the National Heritage Values of the place relating to views and vistas and compromises the juxtaposition between the city and the Adelaide Park Lands that form part of the Listing.

22. The City of Adelaide supports the State Government's intent to refer the Code Amendment to the Federal Department of Climate Change, Energy, the Environment and Water (DCCEEW) as the agency responsible for administering the *Environment Protection and Biodiversity Conservation Act 1999* (Commonwealth).

    22.1. The City of Adelaide encourages the DCCEEW to consider the impact of the policy changes on the National Heritage Listed items, including Old and New Parliament House and the Adelaide Park Lands and City Layout, as well as the cumulative impact of development affecting the Adelaide Park Lands on the National Listing.

    22.2. The City of Adelaide acknowledges that State Heritage Buildings (such as Parliament House) will be referred to the Minister responsible for the *Heritage Places Act 1993* (SA).

23. The City of Adelaide has committed to pursuing World Heritage inscription for Adelaide and its Rural Settlement Landscapes. The Code Amendment (and the development it pre-empts) reduces the integrity of the potential World Heritage attributes of the Adelaide Park Lands and City Layout, with implications for the feasibility of attaining World Heritage status.

Adelaide Park Lands Management Strategy

24. The draft Adelaide Park Lands Management Strategy (APLMS) was approved by Kadaltilla / Adelaide Park Lands Authority on 24 October 2024 and is being referred to the Council and the Minister for Planning for approval.

25. Development of the scale facilitated through the proposed policy changes in the Code Amendment is not envisaged in the Riverbank Precinct of the APLMS.

26. The Code Amendment has not considered the *Adelaide Park Lands Act 2005* (SA), regarding development within the Adelaide Park Lands, particularly an assessment against the statutory principles relating to the public benefit of the Adelaide Park Lands.

Kadaltilla / Adelaide Park Lands Authority Submission

27. The submission endorsed by Kadaltilla / Adelaide Park Lands Authority on 24 October 2024 (Link 2) identified the following key matters:

    27.1. Alignment with the Principles of the *Adelaide Park Lands Act 2005 (SA)* and the Adelaide Park Lands Management Strategy.

    27.2. Protection of the National Heritage Values and referral under the *Environment Protection, Biodiversity Conservation Act 1999 (Commonwealth).*

    27.3. Achievement of the principles of good planning as set out in the Planning, Development and Infrastructure Act 2016 (SA) and State Planning Policies (SPP), including SPP 1 – Integrated Planning, SPP 2 – Design Quality, and SPP 7 – Cultural Heritage.

Draft Submission

28. A draft submission is provided as **Attachment A –** Submission on the Festival Plaza Code Amendment.

29. Given that the outcomes facilitated by the Code Amendment are not envisaged by the City Plan or the APLMS and the potential impacts on the National Heritage Values, the Code Amendment is not supported in its current form.

30. The draft submission outlines the reasons for not supporting the Code Amendment based on the above and recommends further consideration of the City Plan, draft APLMS and NHMP if the Code Amendment proceeds, including seeking amendments to:

    30.1. Reduce the maximum building height to less than the height of the 29 level Festival Tower 1.

    30.2. Increase the setbacks from Parliament House to increase visibility to the State Heritage Place and retain valuable public space.

    30.3. Emphasise public realm outcomes including canopy and greening, pedestrian wayfinding and connectivity, and street-level design to make a positive contribution to its setting, disability access, and safe night-time use for an area of the city that interfaces with cultural institutions, festivals and events.

    30.4. Provide an exemplar architectural response in built form noting the position any future new buildings to Parliament House and the Adelaide Festival Centre and the view of the city and its skyline from Adelaide Oval and Elder Park, incorporate principles of ecologically sustainable development, including a fully electric development, and open-ground plane that improves surveillance to the laneways to the north and west of Parliament House for greater alignment with State Planning Policy 2 – Design Quality.

30.5. Identify views to the Adelaide Park Lands on the Concept Plan.

30.6. Identify the building heights in the policy as well as on the Concept Plan (currently indicated as 40 levels).

31. The draft submission aligns with the submission on the Greater Adelaide Regional Plan (GARP) (see separate Agenda Item) that seeks to incorporate the strategies of City Plan and strengthen recognition and policy protection for the Adelaide Park Lands.

DATA AND SUPPORTING INFORMATION

Link 1 – Festival Plaza Code Amendment

Link 2 – Kadaltilla / Adelaide Park Lands Authority – Submission on the Festival Plaza Code Amendment

ATTACHMENTS

Attachment A – Submission on the Festival Plaza Code Amendment

- END OF REPORT -

Enquiries: S Gilmour 8203 7033

Reference: ACC2024/123718

XX November 2024

Code Amendment Team
Planning and Land Use Services Division
Department for Housing and Urban Development
GPO Box 1815
ADELAIDE SA 5001

By email: plansasubmissions@sa.gov.au

Response to Consultation on Festival Plaza Code Amendment

Thank you for the opportunity to provide input to the Festival Plaza Code Amendment (the Code Amendment).

It is understood that the purpose of the Code Amendment is to amend the City Riverbank Zone and Entertainment Subzone to facilitate redevelopment of Festival Plaza as part of the wider Riverbank Precinct Redevelopment Project.

The City of Adelaide supports appropriate public infrastructure and strategic development of the Riverbank Precinct that will enhance social, economic, and environmental values; however, it does not support the Festival Plaza Code Amendment released for consultation, given the scale of the built form and the State, National, and World Heritage implications and outlines its response below.

The Code Amendment removes existing building height restrictions and includes a new Concept Plan to guide the location of new built form of up to 40 levels, having regard to Parliament House and the Adelaide Festival Centre.

The City of Adelaide has recently finalised its *City Plan – Adelaide 2036* (City Plan) which sets out the spatial vision for the city. The area affected by the Code Amendment is within the North Terrace Local Area in the City Plan. This area is envisaged as the cultural, institutional and governance heart of South Australia.

City Plan Strategy 8 – Designing for Urban Life, Diversity and Density emphasises the city-wide place principle of transitioning height around heritage built form interfaces to ensure that new developments respect and complement existing architectural character. Development of the potential height and scale facilitated through the Code Amendment is not envisaged within the North Terrace Local Area, with growth primarily anticipated on the south side of North Terrace.

The view analysis in the Code Amendment suggests a taller building height for Tower 2 will demonstrate clustering with Tower 1 when viewed from the footbridge. The City of Adelaide submits the second tower should respond to the dominant height of Tower 1 rather than being the dominant height.

DRAFT

The area affected is set within the context of the Nationally Heritage listed Adelaide Park Lands and City Layout, of which City of Adelaide is a custodian. Whilst the draft *Adelaide Park Lands Management Strategy – Towards 2036* (draft APLMS) envisages the Riverbank Precinct to be maintained and developed as a highly modified urban landscape it does not envisage development of the scale anticipated through the Code Amendment in the Riverbank Precinct of the Adelaide Park Lands.

The draft APLMS commits the City of Adelaide and the Government of South Australia to investigate opportunities to return areas to Park Land purposes. It also includes strategies to minimise building footprints and reduce car parking in the Adelaide Park Lands.

In addition, the *National Heritage Management Plan for the Adelaide Park Lands and City Layout* was finalised in July 2024 and identifies:

- The Adelaide Park Lands and City Layout as highly sensitive to new developments within or adjacent to the National Heritage place, and inappropriately designed developments threaten its conservation values.

- The Adelaide Park Lands' views and vistas as important elements of the appreciation, understanding and enjoyment of the National Heritage Values, and are often affected by inappropriate development within or adjacent the boundary of the heritage place.

- The 2020 *Adelaide Park Lands Building Design Guidelines* as a guide for all building development in the Adelaide Park Lands and they establish a set of expectations for design quality.

The City of Adelaide submits that the Code Amendment will unreasonably impact the National Heritage Values of the place relating to views and vistas and compromises the juxtaposition between the city and the Adelaide Park Lands that form part of the Listing.

The City of Adelaide supports the referral of the Code Amendment to the Federal Department of Climate Change, Energy, the Environment and Water (DCCEEW) as the agency responsible for administering the *Environment Protection and Biodiversity Conservation Act 1999.*

- The City of Adelaide encourages the DCCEEW to consider the impact of the policy changes on the National Heritage listed items, including Old and New Parliament House and the Adelaide Park Lands and City Layout, as well as cumulative impact of development affecting the Adelaide Park Lands on the National Listing.

- The City of Adelaide acknowledges that State Heritage Buildings (such as Parliament House) will be referred to the Minister responsible for the *Heritage Places Act 1993 (SA)*.

The City of Adelaide has committed to pursuing World Heritage inscription for Adelaide and its Rural Settlement Landscapes. The Code Amendment (and the development it pre-empts) reduces the integrity of the potential World Heritage attributes of the Adelaide Park Lands and City Layout, threatening the feasibility of attaining World Heritage status.

The City of Adelaide recommends that the Code Amendment include an analysis against the statutory principles of the *Adelaide Park Lands Act, 2005*, particularly in relation to the Adelaide Park Lands continuing to be held for the public benefit of the people of South Australia and demonstrating no net loss of public open space.

If the State Government progresses with the Code Amendment, Council requests further consideration of the outcomes sought through the City Plan, the National Heritage Management Plan, and the *Adelaide Park Lands Act 2005* (SA), as well as the outcomes proposed in the draft Adelaide Park Lands Management Strategy—Towards 2036.

Specifically, the City of Adelaide seeks the following changes to the Code Amendment, showing greater regard to State Planning Policy 2 – Design Quality and State Planning Policy 7 – Cultural Heritage:

- Reduce the maximum building height to less than the height of the 29 level Festival Tower 1.
- Increase the setbacks from Parliament House to increase visibility to the State Heritage Place and retain valuable public space.
- Emphasise canopy and greening, pedestrian wayfinding and connectivity, and street level design to make a positive contribution to its setting, the public realm, disability access and safe night-time use.
- Provide an exemplar architectural response incorporating principles of ecologically sustainable development, including a fully electric development, and open ground plane that improves surveillance to the laneways to the north and west of Parliament House.
- Identify views to the Adelaide Park Lands on the Concept Plan.
- Identify the building heights in the policy as well as on the Concept Plan (currently indicated as 40 levels).

To discuss this further, please contact Sarah Gilmour, Associate Director, Park Lands, Policy and Sustainability, at 8203 7033 or s.gilmour@cityofadelaide.com.au.

Yours sincerely

Michael Sedgman

Chief Executive Officer

Adult Entertainment Premises Code Amendment for Endorsement

Strategic Alignment - Our Places

Public

Tuesday, 5 November 2024

City Planning, Development and Business Affairs Committee

Program Contact:
Sarah Gilmour, Associate Director Park Lands, Policy & Sustainability

Approving Officer:
Ilia Houridis, Director City Shaping

EXECUTIVE SUMMARY

The purpose of this report is to seek endorsement of the Adult Entertainment Premises Code Amendment (the Code Amendment) that has been amended following public consultation (**Attachment A**).

The draft Code Amendment that was on consultation is provided in Link 1. The Code Amendment consultation outcomes and proposed updates to the Code Amendment were presented at a workshop of the City Planning, Development and Business Affairs Committee meeting held on 1 October 2024 (Link 2).

Currently, a proponent can make an application for an Adult Entertainment Premises anywhere in the City of Adelaide and will continue to be able to do so if the draft Code Amendment is endorsed by the Council and approved by the Minister for Planning.

The difference with the introduction of the Code Amendment will be that the relevant planning authority (usually the City of Adelaide's Assessment Manager) will have criteria against which to assess Adult Entertainment Premises and Adult Entertainment Products and Services Premises. There are currently no such criteria.

This is important as all other land uses, such as hotels, petrol stations or consulting rooms have criteria which allow informed, transparent decision making based on land use issues relevant to that use. Without the Code Amendment an application can only be assessed against general policies within the State Government's Planning and Design Code.

The draft Code Amendment does not introduce any new zones or preclude or stop Adult Entertainment as a land use.

Consultation feedback on the draft Adult Premises Code Amendment identified opposing views on the policy framework proposed in the Code Amendment.

The Engagement Report is provided in **Attachment B** and includes the key themes identified during the consultation and the proposed changes to the Code Amendment.

The Administration received a diverse range of views through consultation, and in response to the public consultation feedback, it is proposing to amend the draft Code Amendment policies to focus on reducing land use conflicts. Key changes arising from the consultation include:

- Preferencing the use of policy statements and criteria that address proximity to sensitive land uses in place of buffers as a tool from land uses such as schools, childcare facilities, places of worship and residences.
- Additional policy to manage interface issues between adult entertainment premises and other land uses by guiding adult entertainment uses to be in areas with compatible land uses, and hours of operation, and avoid the interface of neighbourhood-type zones.
- Additional policy to limit the style of advertisements and signage, as exists for other land uses in relation to adult entertainment premises.

The changes primarily relate to Adult Entertainment Premises and changes to the Capital City Zone. The proposed policy framework for Adult Services and Products remains largely unchanged.

The Code Amendment is being undertaken as per the State Government's statutory Code Amendment process (Link 3).

Pending the Council's decision, the Code Amendment and Engagement Report will be submitted to the Minister for Planning for approval.

RECOMMENDATION

The following recommendation will be presented to Council on 12 November 2024 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the amendments to the Planning and Design Code for the Adult Entertainment Premises Code Amendment as contained in Attachment A to Item 7.4 on the Agenda for the meeting of City Planning, Development and Business Affairs Committee held on 5 November 2024.
2. Endorses the Adult Entertainment Premises Code Amendment Engagement Report as contained in Attachment B to Item 7.4 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024.
3. Authorises the Chief Executive Officer, or delegate, to make minor typographical, syntactical and technical amendments to the documents as contained in Attachment A and Attachment B to Item 7.4 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 5 November 2024 for the purpose of seeking approval from the Minister for Planning.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Places • Encourage bold, interesting and purposeful development • Facilitate and activate our places in a safe and accessible way for our community
Policy	The Code Amendment seeks to amend planning policy in the Planning and Design Code relating to existing Zones and Subzones in the City of Adelaide. The Code Amendment responds to a Council priority made through the Planning System Implementation Review submission in January 2023 to seek improvements to land use policy in relation to adult entertainment.
Consultation	The draft Adult Entertainment Premises Code Amendment was released for public consultation from 11 June 2024 to 23 July 2024 (6 weeks). The purpose of the engagement was to inform and consult on the proposed policies to guide the development of adult entertainment premises and adult products and services premises within the City of Adelaide. Administration updated content on the Our Adelaide website and had follow-up meetings with two key stakeholder groups following the close of consultation to clarify matters raised in their submissions.
Resource	Not as a result of this report
Risk / Legal / Legislative	The draft Adult Entertainment Premises Code Amendment seeks to introduce robust policies to guide land uses within the City of Adelaide, to ensure that they are sited and developed appropriately.
Opportunities	The Code Amendment seeks to introduce planning policy contained in the Planning and Design Code to assist development assessment in the City of Adelaide, including greater certainty for residents and development proponents in relation to Adult Entertainment and Adult Products and Services Premises. The amendments to the Planning and Design Code will support a cross-section of objectives contained in the City of Adelaide Strategic Plan 2024-2028 and the Council's submission endorsed in January 2023 to the State Planning System Implementation Review. The Code Amendment supports the City of Adelaide's strategic context and desire to create a vibrant city that attracts and supports a growing population through the provision of entertainment and music venues, a thriving night-time economy and high-quality residential amenity.
24/25 Budget Allocation	The City of Adelaide Annual Business Plan and Budget includes $240,000 for delivering year 2 of the Planning and Design Code Amendment Program 2023-2026.
Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	Changes to planning policy in the Planning and Design Code is through a Code Amendment Process. The policies developed through this Code Amendment will be used for the ongoing assessment and management of these land uses within the City of Adelaide.
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (e.g. maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

Background

1. The purpose of this report is to seek endorsement of the Adult Entertainment Premises Code Amendment (the Code Amendment) that has been amended following public consultation (**Attachment A**).
2. The Code Amendment is being undertaken as per the State Government's statutory Code Amendment process. Steps undertaken to date include:
    2.1. The Minister for Planning, the Hon. Nick Champion MP, endorsed the Proposal to Initiate the Adult Entertainment Premises Code Amendment on 5 December 2023.
    2.2. On 11 March 2024 Council endorsed the draft Code Amendment for public consultation.
    2.3. The draft Code Amendment was open for public consultation from 11 June to 23 July 2024.
3. The draft Code Amendment that was on consultation is provided in Link 1.
4. The Code Amendment consultation outcomes and proposed updates to the Code Amendment were presented at a workshop of the City Planning, Development and Business Affairs Committee meeting held on 1 October 2024 (Link 2).
5. Currently, a proponent can make an application for an Adult Entertainment Premises anywhere in the City of Adelaide and will continue to be able to do so if the draft Code Amendment is endorsed by the Council and approved by the Minister for Planning.
6. The difference with the introduction of the Code Amendment will be that the relevant planning authority (usually City of Adelaide's Assessment Manager) will have criteria against which to assess Adult Entertainment Premises and Adult Entertainment Products and Services Premises. There are currently no such criteria.
7. This is important as all other land uses, such as hotels, petrol stations or consulting rooms have criteria that allow informed, transparent decision-making based on issues relevant to that use. Without the Code Amendment, an application can only be assessed against general policies within the State Government's Planning and Design Code.
8. The draft Code Amendment does not propose any new zones within the Planning and Design Code or propose to preclude or stop Adult Entertainment as a land use.
9. Consultation feedback on the draft Adult Premises Code Amendment identified opposing views on the policy framework proposed in the Code Amendment.

Summary of Consultation

10. The Engagement Report is provided in **Attachment B** and includes the key themes identified during the consultation and the proposed changes to the Code Amendment.
11. Consultation was undertaken in accordance with the approved Engagement Plan and the State Government's Community Engagement Charter and Practice Direction 2.
12. The City of Adelaide undertook early engagement with the following agencies at the request of the Minister for Planning:
    12.1. Consumer and Business Services
    12.2. SA Police
    12.3. State Government Agency, Planning and Land Use Services (PLUS).
13. Public consultation on the draft Code Amendment opened on 11 June 2024 and closed on 23 July 2024 (6 weeks).
14. Public consultation activities included:
    14.1. Letters/electronic direct mail to relevant state, regional and local government agencies, Members of Parliament, First Nations, and local business and community groups.
    14.2. Notices on the SA Planning Portal and the City of Adelaide Engagement Platform.
    14.3. Public notice via the Advertiser and SA Government Gazette.
    14.4. Face to face/online briefings by request.

14.5. Phone and email enquiries.

15. A total of 36 submissions were received during the public consultation period from industry groups, community groups, residents, and individuals.

    15.1. Seventeen (17) written submissions were received:

        15.1.1. One of these submissions had 16 signatories.

        15.1.2. One of these submissions had 6 signatories.

    15.2. Nineteen (19) participants provided their feedback via a survey relating to the Code Amendment.

16. The City of Adelaide also received an email that was distributed by 90 individuals to various members of Parliament in South Australia.

17. A diverse range of views were provided through the consultation, and the majority of the 36 submissions to the consultation sought changes to the Code Amendment.

18. Administration updated content on the Our Adelaide website and had follow-up meetings with two key stakeholder groups following the close of consultation to clarify matters raised in their submissions.

Proposed Amendments to the Code Amendment

19. In response to the public consultation feedback, the Administration is proposing to amend the draft Code Amendment policies. The proposed amendments are depicted in red in **Attachment B**.

20. Key changes arising from the consultation include (refer to Map 1):

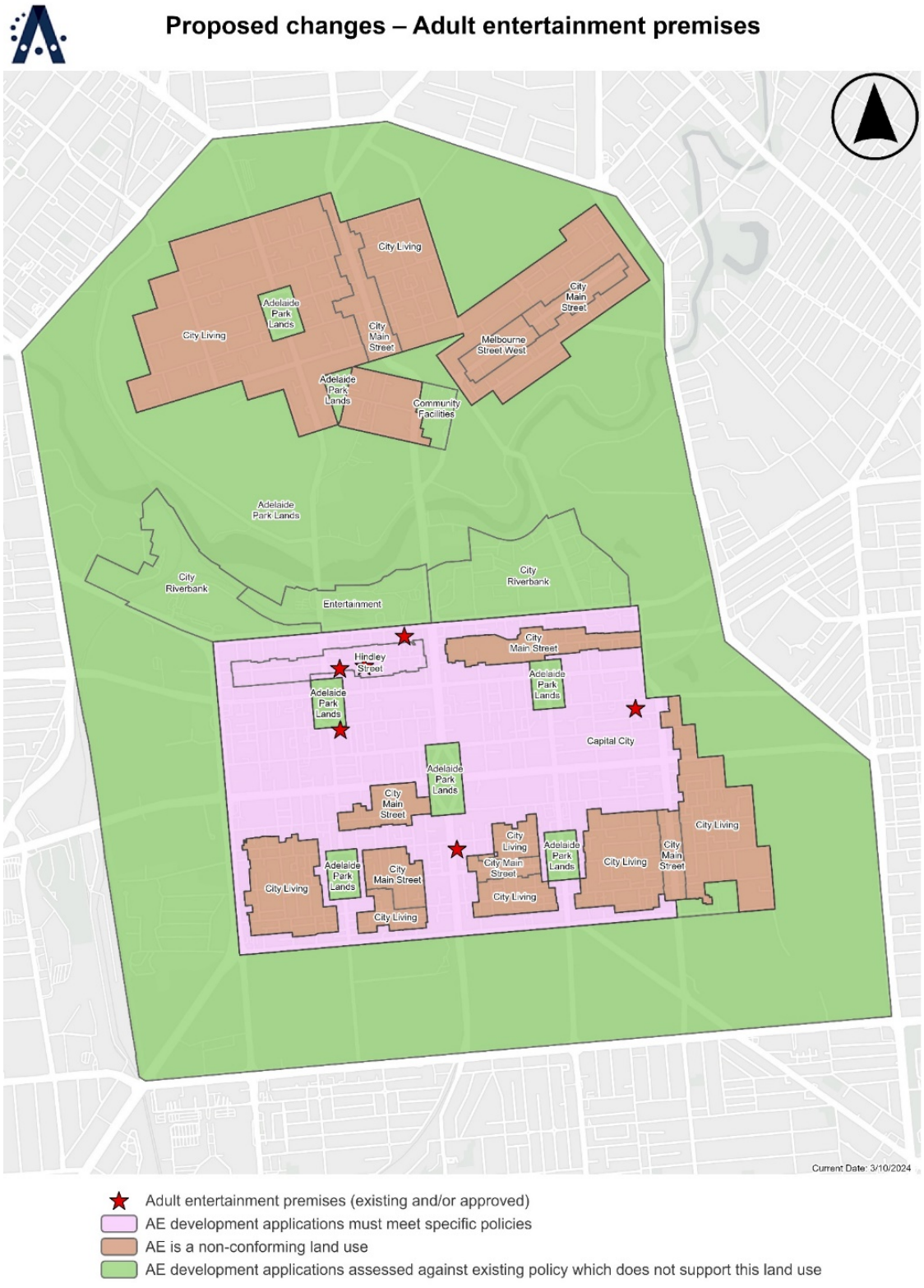
    20.1. Removal and replacement of buffer distances from schools, childcare facilities, places of worship and residential land uses, with additional policies that address proximity to sensitive land uses.

    20.2. Additional policy to manage interface issues between adult entertainment premises and other land uses by guiding adult entertainment uses to be in areas with compatible land uses, and hours of operation, and avoid the interface of neighbourhood-type zones.

    20.3. Additional policy to limit advertisements in relation to adult entertainment premises.

21. The changes relate to Adult Entertainment Premises. The proposed policy framework for Adult Services and Products remains largely unchanged.

Map 1 – Adult Entertainment Premises – proposed policies



Next Steps

22. Pending Council decision, the Code Amendment and Engagement Report will be sent to the Minister for Planning for approval.

23. If the Minister decides to adopt the Code Amendment it is then referred to the Environment Resources and Development Committee (ERDC) in Parliament within 28 days of the Code Amendment taking affect.

24. Following the outcome of the statutory processes, the Administration will close the public consultation process in accordance with its Engagement Plan.

DATA AND SUPPORTING INFORMATION

Link 1 – Draft Adult Entertainment Premises Code Amendment – Consultation Version

Link 2 – Draft Adult Entertainment Premises Code Amendment Consultation Summary Workshop, Tuesday, 1 October 2024

Link 3 – State Government's statutory Code Amendment process

ATTACHMENTS

Attachment A – Amendments to the Planning and Design Code for the Adult Entertainment Premises Code Amendment

Attachment B – Engagement Report

- END OF REPORT -

Attachment A

Adult Entertainment Premises Code Amendment

City of Adelaide

Policy Amendments Post Consultation

Table 1: Proposed changes to Hindley Street Subzone Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria / Designated Performance Feature	
Built Form and Character		
PO x.x For adult entertainment premises, adequate design measures that ensure safety and security of employees and visitors must be provided. Where appropriate, this should include: a) reception and visitor assessment areas that incorporate design measures and management procedures to ensure the safety and security of employees and visitors; and b) interior and exterior design which minimises alcoves and entrapment spaces; and c) adequate lighting of entry and exit ways; and d) any objects in front of entrances or exits must not exceed 1.1m in height, and e) landscaping should not obstruct the visibility of entrances and exits.	**DTS/DPF X.X** None are applicable	
PO x.x For adult entertainment premises or adult products and services premises, adequate design measures that minimise the impact on the public realm and streetscape, including: a) the interior must not be visible from any place in the public domain; and b) reception and visitor assessment areas should be located inside the premises.	**DTS/DPF X.X** None are applicable	
Advertisements		
PO x.x Advertisements and displays for adult entertainment premises and adult products and services should be limited in size and scale, and be visually discreet.	**DTS/DPF X.X** None are applicable	
PO x x Advertisements for adult entertainment premises should be discreet and limited to advertisements that identify the location of premises and business name.	**DTS/DPF X.X** None are applicable.	**INSERT**
Interface		
P O x x Land uses typically open during night-time hours, including adult entertainment premises are located in areas that have land uses with compatible hours of operation.	**DTS/DPF X.X** None are applicable	**INSERT**
P O x x Adult Entertainment Premises are designed and sited to mitigate off-site impacts so as to not unreasonably impact the amenity of places of worship, childcare facilities or schools in the locality.	**DTS/DPF X.X** None are applicable.	**INSERT**

Table 2: Proposed changes to Capital City Zone - Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature	
Land Use		
~~PO x.x Adult entertainment premises should be located an appropriate distance from residential use or land used for a place of worship, childcare centre, primary school or secondary school.~~	~~**DTS/DPF X.X**~~ ~~At least 50 metres from the site boundary of subject site.~~	**DELETE**
Built Form and Character		
PO x.x For adult entertainment premises, adequate design measures that ensure safety and security of employees and visitors must be provided. Where appropriate, this should include: a) reception and visitor assessment areas that incorporate design measures and management procedures to ensure the safety and security of employees and visitors; and b) interior and exterior design which minimises alcoves and entrapment spaces; and c) adequate lighting of entry and exit ways; and d) any objects in front of entrances or exits must not exceed 1.1m in height; and e) landscaping should not obstruct the visibility of entrances and exits.	**DTS/DPF X.X** None are applicable	
PO x.x For adult entertainment premises or adult products and services premises, adequate design measures that minimise the impact on the public realm and streetscape, including: a) the interior must not be visible from any place in the public domain; and b) reception and visitor assessment areas should be located inside the premises.	**DTS/DPF X.X** None are applicable	
Advertisements		
PO x.x Advertisements and displays for adult entertainment premises and adult products and services should be limited in size and scale, and be visually discreet.	**DTS/DPF X.X** None are applicable	
Interface		
P O x x Land uses typically open during nigh-ttime hours, including adult entertainment premises, are located in areas that have land uses with compatible hours of operation.	**DTS/DPF X.X** None are applicable	**INSERT**
P O x x Adult Entertainment Premises are designed and sited to mitigate off-site impacts so as to not unreasonably impact the amenity of: • places of worship, childcare facilities or schools in the locality; or	**DTS/DPF X.X** None are applicable	**INSERT**

• residential development in adjacent neighbourhood-type zones.	
P O x x Adult Entertainment Premises do not operate during the day-time hours of places of worship, childcare facilities or schools in the locality.	**DTS/DPF X.X** None are applicable

INSERT

Table 3: Proposed changes to City Frame subzone - Assessment Provisions

Performance Outcome	**Deemed-to-satisfy Criteria/Designated Performance Feature**
Land Use and Intensity	
PO x x Adult Entertainment premises that: a) are small in scale b) secondary to the primary land uses mix of the street c) are located above ground level d) limited in number do not detract from the street's daytime activation e) minimise negative impacts on nearby residential development; and f) are avoided at the interface with the City Living Zone.	**DTS/DPF X.X** None are applicable

INSERT

Table 4: Proposed changes to City Main Street Zone (excluding Hindley Street Subzone) – Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Other than where located within the Hindley Street Subzone, development does not include adult entertainment premises.	**DTS/DPF X.X** None are applicable
Built Form and Character	
PO x.x For adult products and services premises, adequate design measures that minimise the impact on the public realm and streetscape, including: a) the interior must not be visible from any place in the public domain; and b) reception and visitor assessment areas should be located inside the premises.	**DTS/DPF X.X** None are applicable
Advertisements	
PO x.x Advertisements and displays for adult products and services should be limited in size and scale, and be visually discreet.	**DTS/DPF X.X** None are applicable

Table 5: Proposed changes to Gouger and Grote Street Subzone – Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises.	**DTS/DPF X.X** None are applicable
Built Form and Character	
PO x.x For adult products and services premises, adequate design measures that minimise the impact on the public realm and streetscape, including: a) the interior must not be visible from any place in the public domain; and b) reception and visitor assessment areas should be located inside the premises.	**DTS/DPF X.X** None are applicable
Advertisements	
PO x.x Advertisements and displays for adult products and services should be limited in size and scale, and be visually discreet.	**DTS/DPF X.X** None are applicable

Table 6: Proposed changes to Rundle Mall Subzone – Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises.	**DTS/DPF X.X** None are applicable
Built Form and Character	
PO x.x For adult products and services premises, adequate design measures that minimise the impact on the public realm and streetscape, including: a) the interior must not be visible from any place in the public domain; and b) reception and visitor assessment areas should be located inside the premises.	**DTS/DPF X.X** None are applicable
Advertisements	
PO x.x Advertisements and displays for adult products and services should be limited in size and scale, and be visually discreet.	**DTS/DPF X.X** None are applicable

Table 7: Proposed changes to Rundle Street Subzone – Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises.	**DTS/DPF X.X** None are applicable
Built Form and Character	
PO x.x For adult products and services premises, adequate design measures that minimise the impact on the public realm and streetscape, including:	**DTS/DPF X.X** None are applicable

a) the interior must not be visible from any place in the public domain; and b) reception and visitor assessment areas should be located inside the premises.	
Advertisements	
PO x.x Advertisements and displays for adult products and services should be limited in size and scale, and be visually discreet.	**DTS/DPF X.X** None are applicable

Table 8: Proposed changes to City High Street Subzone –Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises.	**DTS/DPF X.X** None are applicable
Built Form and Character	
PO x.x For adult products and services premises, adequate design measures that minimise the impact on the public realm and streetscape, including: a) the interior must not be visible from any place in the public domain; and b) reception and visitor assessment areas should be located inside the premises.	**DTS/DPF X.X** None are applicable
Advertisements	
PO x.x Advertisements and displays for adult products and services should be limited in size and scale, and be visually discreet.	**DTS/DPF X.X** None are applicable

Table 9: Proposed changes to Melbourne Street West Subzone – Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises.	**DTS/DPF X.X** None are applicable
Built Form and Character	
PO x.x For adult products and services premises, adequate design measures that minimise the impact on the public realm and streetscape, including: a) the interior must not be visible from any place in the public domain; and b) reception and visitor assessment areas should be located inside the premises.	**DTS/DPF X.X** None are applicable
Advertisements	
PO x.x Advertisements and displays for adult products and services should be limited in size and scale, and be visually discreet.	**DTS/DPF X.X** None are applicable

Table 10: Proposed changes to City Living Zone – Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises or adult products and services premises.	**DTS/DPF X.X** None are applicable

Table 11: Proposed changes to Medium-High Intensity Subzone - Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises or adult products and services premises.	**DTS/DPF X.X** None are applicable

Table 12: Proposed changes to North Adelaide Low Intensity Subzone - Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises or adult products and services premises.	**DTS/DPF X.X** None are applicable

Table 13: Proposed changes to East Terrace Subzone - Assessment Provisions

Performance Outcome	Deemed-to-satisfy Criteria/Designated Performance Feature
Land Use and Intensity	
PO 1.x Development does not include adult entertainment premises or adult products and services premises.	**DTS/DPF X.X** None are applicable

Adult Entertainment Premises Code Amendment

Engagement Report

Section 73(7) of the *Planning, Development and Infrastructure Act 2016*

City of Adelaide

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1 Purpose

This report has been prepared by *City of Adelaide* (the Designated Entity) for consideration by the Minister for Planning and Local Government (the Minister) in adopting the *Adult Entertainment Premises Code Amendment* (the Code Amendment).

The report has been prepared in accordance with Section 73(7) of the *Planning, Development and Infrastructure Act 2016* (SA) and Part 6 of Practice Direction 2: Preparation and Amendment of a Designated Instrument (Practice Direction 2).

The report includes:

- Details of the engagement process undertaken
- A summary of the feedback received
- A response to the feedback including recommended amendments, an evaluation of the effectiveness of the engagement, and whether the principles of the Community Engagement Charter have been achieved.

The report also confirms that engagement has been undertaken in accordance with the Engagement Plan, prepared under part 2(5) of Practice Direction 2. The report recommends amendments to the proposed Code Amendment in response to the submissions received.

2 Introduction

The City of Adelaide seeks to amend the SA Planning and Design Code (the Code Amendment) by introducing policies to several existing Zones and Subzones to control the use of land for the purposes of adult entertainment premises and adult products and services premises.

The Planning and Design Code recently introduced land use definitions for 'adult entertainment premises' and 'adult products and services'. These land uses are not directly referred to in the existing Zones, Subzones or Overlays applying to land in the City of Adelaide.

The proposed Code Amendment relates to land within the following existing Zones and Subzones within the City of Adelaide:

- Capital City Zone, including the City Frame Subzone
- City Living Zone, including Medium-High Intensity Subzone; North Adelaide Low Intensity Subzone; and East Terrace Subzone
- City Main Street Zone, including Gouger and Grote Street Subzone; Hindley Street Subzone, Rundle Mall Subzone; City High Street Subzone
- Melbourne Street West Subzone
- Entertainment Subzone.

The purpose of the Code Amendment is to introduce robust policies to guide these land uses within the City of Adelaide, to ensure that they are sited and developed appropriately. The Code Amendment supports the City of Adelaide's strategic context and desire to create a vibrant city that attracts and supports a growing population through the provision of entertainment and music venues, a thriving night-time economy and high-quality residential amenity.

The draft Adult Entertainment Premises Code Amendment was released for public consultation on 11 June 2024 to 23 July 2024 (6 weeks). The purpose of the engagement was to inform and consult on the proposed policies to guide the development of adult entertainment premises and adult products and services premises within the City of Adelaide.

3 Engagement Approach

The process for amending a designated instrument (including the process to amend the Planning and Design Code) is set out in the *Planning, Development and Infrastructure Act 2016* (SA) (the Act). The Act requires public engagement to take place in accordance with the Community Engagement Charter.

The City of Adelaide prepared an engagement plan (the Engagement Plan) to apply the principles of the Community Engagement Charter. The Minister approved the Engagement Plan on 5 December 2023. The purpose of the engagement was to provide individuals, businesses, organisations and communities interested in and/or affected by the proposed Code Amendment an opportunity to provide feedback and influence particular elements of the proposed Code Amendment during the preparation stage, and prior to the finalisation of the Code Amendment.

3.1 Engagement Objectives

The engagement objectives were:

- Ensure stakeholders are aware of the Code Amendment and have the opportunity to comment.
- To make information available about the Code Amendment in ways that enable ease of understanding about what a Code Amendment is, what this Code Amendment is proposing, the rationale, how the Code Amendment relates to future development of land, and how people can comment.
- Ensure engagement of community and stakeholders so as to inform the Code Amendment in its preparation.
- Encourage stakeholders to ask questions in order to understand how it might impact them.
- Provide opportunities for the general public, landowners and occupants to comment.
- Maintain constructive relationships with stakeholders and the community through timely and direct communication.
- Follow through on commitments made over the duration of the consultation process and ensure that all documentation is easily accessible to the public.
- Integrate a feedback loop and evaluation process into the engagement process.
- Ensure that engagement with stakeholders and the community is sufficiently resourced and managed to deliver high-quality results.
- Implement an engagement approach that is directed by the principles of IAP2 and the State Community Engagement Charter in accordance with the requirements of the Planning, Development and Infrastructure Act 2016.

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3.2 Engagement Activities

Public Engagement for the Adult Entertainment Premises Code Amendment was held for six weeks from 11 June to 23 July 2024. Engagement activities included:

Engagement Activity	Description	Target audience
Webpage on the Plan SA Portal	Relevant information including draft Code Amendment and information on the multiple ways that feedback could be accepted was included on the webpage.	All audiences
Community engagement page on City of Adelaide website	The City of Adelaide's online community engagement platform included the draft Code Amendment, FAQs, information brochure, link to Engagement Plan and Interactive Map. The frequently asked questions were in plain English. The interactive map was a useful visual tool to illustrate the impacts of the proposed policy, locations of adult entertainment premises and sensitive receivers.	All audiences
Letters/electronic direct mail	Letters were sent to relevant state, regional and local government agencies, Members of Parliament, First Nations, and local business and community groups. *56 letters/emails were sent to stakeholders*	Key stakeholders
Public Notice	An advertisement was placed in the Advertiser and SA Government Gazette advising of the consultation.	All audiences
Online Survey	An online survey form was linked to the website. The online survey included open ended questions to seek broad views on the draft Code Amendment	All audiences
Online and face to face meetings by request	The City of Adelaide held two meetings with key stakeholders by request.	Identified stakeholders
Phone and email contact	A phone number and dedicated email address was promoted through all correspondence as well as on the fact sheet, as a way further information could be requested or feedback provided.	All audiences
Post Engagement Evaluation Survey	A link to a post engagement survey was sent to all respondents who provided feedback to the consultation.	Those who provided feedback on Code Amendment

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4 Engagement Outcomes

The engagement approach for this Code Amendment was designed to provide multiple ways for information to be accessed and feedback provided. Consultation feedback on the draft Code Amendment identified opposing views on the policy framework proposed in the Code Amendment. The majority of the 36 submissions received recommended changes to the draft Code Amendment. The nature of the submissions received can be categorised as follows:

Nature of the Submission	**Count**
Support the Code Amendment subject to increasing the buffer distance or increasing the number of zones where the buffer distance applies	12
Do not support the Code Amendment as it is perceived to negatively impact the sex worker industry	10
Neutral	5
Adult Entertainment should not be directed primarily to Hindley Street which should have the same controls as the rest of the city	3
Support the Code Amendment	2
Opposed to Adult Entertainment in the city	2
Do not support the Code Amendment (no reason provided)	2

The key themes/policy issues raised through the consultation process was as follows:

- Identify more locations where these uses are not appropriate and/or increase the buffer distances from sensitive uses.
- The Code Amendment creates a perceived 'Red Light District' in Hindley Street and Hindley Street should be treated the same as the rest of the city.
- The Code Amendment is discriminatory and will impact business and the sex worker industry.
- The Code Amendment will result in fewer purpose-built premises and result in more unregulated activities.
- Support for Adult Entertainment venues having limited advertising and discrete advertising.
- *Concerns regarding definition of Adult Products and Services Premises (beyond the scope of the Code Amendment)*
- *Other Zoning/Planning and Design Code comments (beyond the scope of the Code Amendment)*

Attachment 1 provides a summary of the submissions and detailed responses to each submission. Consultation responses were primarily collected through written submissions and the online survey.

4.1 Online Survey

The online survey was available through the City of Adelaide's Engagement platform, Our Adelaide. The engagement response was as follows:

- Twenty-eight (28) participants undertook a survey relating to the Code Amendment with nineteen (19) participants providing feedback.
- Eight (8) of the survey respondents noted in principle support for the draft Code Amendment and the concept of spatially restricting adult entertainment premises and ensuring appropriate distance

between adult entertainment premises and product and services premises and uses such as schools, childcares, places of worship and residential land uses

- Eleven (11) of the survey respondents were in opposition to the Code Amendment.
- Survey respondents included residents of the City of Adelaide, visitors, city workers, sex industry workers, patrons of adult entertainment venues and people with a general interest in the Code Amendment.

The survey included free-form responses that identified opposing views on the policy framework proposed in the Code Amendment. Most of the survey respondents recommended changes to the draft Code Amendment.

4.1.1 What we heard

Some respondents considered that the policy controls should exclude land uses from more areas.

> *"I would suggest reducing this distance requirement or considering additional locations outside of simply Hindley Street"*
>
> *"A 50 metre distance is hardly a buffer zone as the proposed premises could still be located within the same city block as the above uses. Therefore, the buffer zone should be 200 metres"*

Conversely, other respondents were concerned about the impacts of the Code Amendment on the sex work industry.

> *"These proposed changes will negatively impact sex workers and strippers trying to earn a living. This further stigmatises them and makes it intentionally difficult for them to work safely and easily"*

At least one respondent acknowledged the need to address a gap in planning policy.

> *"It will address a gap in the current Code and provide greater clarity for Development Applications for Adult Premises"*

The survey included a response recommending changes to planning policy and zoning in the city, including the expansion of the City Living Zone which is beyond the scope of this Code Amendment.

4.2 Written Submissions

There were multiple ways for the community to provide feedback including via written submission through the PlanSA Portal, email or post.

A total of seventeen (17) written submissions were received. One of these submissions had 16 signatories who requested their submission be counted individually. Another submission had 6 signatories.

The City of Adelaide was also a recipient of an email distributed to various Members of Parliament. The email, containing identical wording, was distributed by 90 individuals.

The concerns raised in this email and other written submissions, have been summarised in Attachment 1 with all written submissions included in Attachment 3.

4.2.1 What we heard

Identify more locations where these uses are not appropriate and/or increase the buffer distances from sensitive uses.

> *"Increase the 'buffer distance' from existing residential uses or land used for a place of worship, childcare centre, primary school or secondary school from 50 metres to a minimum of 200 metres"*
>
> *"A distance of 50 metres is not at all adequate to provide a reasonable buffer between a venue or business providing adult entertainment or products etc, and a school or residential building"*

The Code Amendment creates a perceived 'Red Light District' in Hindley Street and Hindley Street should be treated the same as the rest of the city.

"*Concerned by the decision to omit Hindley Street from this buffer zone, reinforcing the negative perceptions that have long held back the development of this part of the city. This distinction from the rest of the city is in effect a sanctioning of a redlight district in Adelaide's West End"*

"With the only viable location available to anyone wanting to open a purpose-built adult entertainment premises being the Hindley Street sub-zone, this has the potential to create a Red-Light district"

The Code Amendment is discriminatory and will impact business and the sex worker industry.

"*The proposed Adult Entertainment Premises Code Amendments are discriminatory"*

"*The proposed amendments to the planning code seek to push adult entertainment premises/industries (and those that work within the industry) into constrained, restrictive spaces, severely impacting the safety, rights,* and agency of workers"

"The adult retail industry is a growing sector that emphasizes education, inclusivity, and the positive impact on clients' sexual and mental health"

"This will significantly impact both business and individuals who are both employed by and seek these services"

The Code Amendment will result in fewer purpose-built premises and result in more unregulated activities.

"In significantly limiting suitable land for Adult Entertainment premises, the Code Amendment would restrict and impede opportunity for new venues (including sex-worker lead businesses) to gain a foothold in Adelaide's Live Adult Entertainment landscape"

"the restriction upon purpose-built venues, in combination with the specific exclusion of premises where sexually explicit entertainment is undertaken temporarily within the proposed amendments, directly forces workers into a gig economy".

"purpose-built premises bolster workplace health and safety, but it gives us greater freedom of choice as workers"

Buffer Distances

"When using the interactive map provided by the Adelaide City Council it becomes apparent that these amendments are nothing more than a thinly veiled ban on adult entertainment establishments"

"*It is inappropriate to suggest that adult entertainment and adult products and service premises could be safely regulated based on distance from a nominated type of premises in some zones along Hutt Street. Firstly, it is a complex and challenging schema for the residents (and others) to understand. Secondly, it isn't easy to implement."*

Definitions and Terms

"*Recommends removing the disclaimer in the definition given for Adult Entertainment and Adult Products and Services premises that such spaces "does not include premises used for prostitution." Not only does this language not reflect that used within the industry, but this could also present issues in future should the sex industry finally be fully decriminalised in South Australia."*

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4.3 Key themes

Several themes/planning policy matters were raised in the consultation that require further consideration and response. A summary of key issues raised, and responses follows.

4.3.1 Buffer distances

Submissions from stakeholders and the community raised concerns with the application of planning policy that sought Adult Entertainment Venues be located a minimum of a 50-metres from residential land uses, places of worship, schools and childcare centres.

The submissions highlighted the opposing viewpoints on the policy approach. Some respondents who supported the Code Amendment suggested an increase setback/buffer from land uses and/or use of buffers in additional locations (such as Hindley Street). Some respondents who opposed the Code Amendment suggested the buffers were too restrictive. Some respondents also noted concern about the methodology of the buffer distance and its implications, whilst others noted that buffer distances should also be applied to Adult Products and Services Premises.

Response

The Code Amendment recognises that adult entertainment premises and adult products and services are anticipated within a capital city and are part of the economy. Following consultation, the policy framework for Adult Entertainment Premises is amended to focus on managing interface issues between land uses.

The 'buffer' policy that sought Adult Entertainment Premises locate 50 metres from childcare centres, schools, residential land uses and places of worship was replaced with additional policy provisions to manage interfaces between different uses. The policy amendments apply to the existing Capital City Zone and the existing Hindley Street Subzone.

The policy seeks to:

- Guide Adult Entertainment Premises to be in areas with compatible land uses and hours of operation and avoid being located at the interface of neighbourhood-type zones
- Improve the design and sitting of Adult Entertainment Premises to mitigate conflict between different land uses
- Limit and provide discretion for advertising
- In the Capital City Zone, if adult entertainment premises are proposed near schools, childcare centres and places of worship, they are closed during daytime hours to minimise land use conflicts.

The proposed buffer distances, while a useful communication tool, would rely on data outside of the Planning and Design Code leading to uncertainty in the development assessment process. As the mix of land uses evolves in the city, the implications of the proposed 'buffers' could result in unintended consequences of concentrating Adult Entertainment Premises. It is not the intent of the Code Amendment to preclude or stop Adult Entertainment Premises but to introduce planning policy to support development assessment of these land uses.

The purpose of the Code Amendment is to introduce robust policies to guide the development of Adult Entertainment Premises and Adult Products and Services Premises to ensure interface issues are managed and land uses conflicts are minimised.

It is noted that some respondents provided feedback that buffer distances should be applied to adult products and services premises. The policy proposed in the Code Amendment in respect to adult

product and services premises is considered to minimise the impact of these uses on the public realm and streetscape, as such, no amendments to this policy is proposed.

In the existing Capital City Zone and existing Main Street Zones (and associated Subzones), adult products and services premises would be considered appropriate subject to addressing specific policies. The policy proposed in the Code Amendment would mean adult products and services premises are not considered to meet performance outcomes in the existing City Living Zones.

4.3.2 The Code Amendment creates a perceived 'Red Light District' in Hindley Street and Hindley Street should be treated the same as the rest of the city.

Several respondents expressed concerns with the proposed policy approach for the existing Hindley Street Subzone, including that the buffers did not extend to this area. Many noted that the distinction of Hindley Street Subzone would create a perceived 'Red Light District' leading to undesirable outcomes for the Street, businesses within the areas and for individuals who work at Adult Entertainment Venues.

Response

The Code Amendment policy be amended to replace buffers with additional policies that guide Adult Entertainment Premises to locate in areas with compatible land uses and hours of operation such as nightclubs, bars and other late-night venues.

The amendments result in the existing Capital City Zone and the existing Hindley Street Subzone being subject to a consistent policies and assessment designed to manage interface issues.

4.3.3 Advertising for Adult Entertainment Premises and Adult Products and Services Premises

Respondents were generally supportive of Adult Entertainment venues having limited or discrete advertising.

Response

The Code contains existing policy in respect to assessing advertisements from which the policy for Adult Entertainment Premises was modelled.

Following public consultation, the policy in the Code Amendment will be strengthened such that advertisements for Adult Entertainment Premises will be visually discreet and limited in size and scale.

4.3.4 The Code Amendment is discriminatory and will impact business and the sex worker industry

Several submissions raised concern that the Code Amendment was discriminatory. Respondents noted that Adult Entertainment Premises and Adult Products and Services were being treated differently from other land uses and proposed policies were unjustly restrictive. Those who opposed the Code Amendment noted that the policies proposed in the draft Code Amendment contribute to stigmatisation.

Response

The Planning and Design Code introduced in 2021 did not include definitions for 'adult entertainment premises' or 'adult products and services premises'. Consequently, these land uses were categorised as 'licensed premises' and 'shop' and assessed as such. In June 2023, the State Government introduced definitions for Adult Entertainment Premises in the Code in response to community and local government feedback about the need for specific policies to assess these land uses, including submission by the City of Adelaide.

To be consistent with how other land uses are assessed, for example, a petrol station, dwelling, night club or hospital, the Code Amendment will introduce policies to support development assessment of Adult Entertainment Premises and Adult Products and Services Premises.

Adult Entertainment Premises and adult products and services premises are land uses that exist in a capital city. The Code Amendment does not propose to preclude or stop Adult Entertainment Premises and Adult Products and Services as a land use, it proposes to provide policy to assess such land uses.

5 Summary of recommended changes

Key changes to the Code Amendment arising from consultation are:

- Removal and replacement of buffer distances from schools, childcare facilities, places of worship and residential land uses, with additional policies that address proximity to sensitive land uses.
- Additional policy to manage interface issues between adult entertainment premises and other land uses by guiding adult entertainment uses to be in areas with compatible land uses and hours of operation and avoid the interface of neighbourhood-type zones.
- Additional policy to limit advertisements in relation to adult entertainment premises.

The changes relate to Adult Entertainment Premises. The proposed policy framework for Adult Services and Products remains largely unchanged.

6 Evaluation of Engagement

To ensure the principles of the Community Engagement Charter (the Charter) are met, an evaluation of the engagement process for the Code Amendment has occurred.

5.1 Performance Indicators for Evaluation

The minimum mandatory performance indicators have been used to evaluate engagement on the Code Amendment. These measures help to gauge how successful the engagement has been in meeting the Charter's principles for good engagement.

Evaluation of Engagement by Community Members

The minimum mandatory performance indicators required an evaluation of responses from members of the community on the engagement. This includes an evaluation of whether (or to what extent) community members felt:

1. That the engagement **genuinely sought** their input to help shape the proposed Code Amendment.
2. **Confident their views were heard** during the engagement.
3. They were given an adequate **opportunity to be heard**.
4. They were given **sufficient information** so that they could take an informed view.

5. **Informed** about why they were being asked for their view, and the way it would be considered. This evaluation was undertaken through a post engagement online survey.

This evaluation was undertaken via a survey provided to respondents to the engagement process that provided their contact details (including signatories of submissions). The survey received 14 responses (27% response rate).

In addition to the above mandatory performance indicators, respondents were also asked whether they would like to provide any additional feedback on the consultation process.

A copy of the engagement survey can be found in Attachment 2.

Evaluation of Engagement by the Designated Entity

A further evaluation of the engagement process is required to be undertaken by (or on behalf of) the Designated Entity. The minimum performance indicators require an evaluation by the Designated Entity of whether (or to what extent) the engagement:

1. **Occurred early enough** for feedback to genuinely influence the planning policy, strategy or scheme.
2. **Contributed to the substance** of the final draft Code Amendment.
3. **Reached those identified** as communities or stakeholders of interest.
4. **Provided feedback to community** about outcomes of engagement.
5. Was **reviewed throughout** the process and **improvements put in place or** recommended for future engagement.

The evaluation of the engagement was undertaken by Colleen McDonnell, Manager City Planning & Heritage Park Lands Policy & Sustainability on behalf of the Designated Entity. The results of the evaluation are contained in Attachment 2 to this Engagement Report.

5.2 Evaluation against the Charter principles

The following is a summary of the evaluation of engagement against the five principles of the engagement charter.

Evaluation results – Community Members

	Evaluation statement	Strongly disagree	Somewhat disagree	Not sure	Somewhat agree	Strongly agree
1	**I feel the engagement genuinely sought my input to help shape the proposal (Principle 1)**	14.29%	14.29%	35.71%	28.57%	7.14%
2	**I am confident my views were heard during the engagement (Principle 2)**	7.14%	0%	71.43%	14.29%	7.14%
3	**I was given an adequate opportunity to be heard (Principle 3)**	21.43%	0%	50.00%	21.30%	7.14%
4	**I was given sufficient information so that I could take an informed view. (Principle 3)**	7.14%	7.14%	35.71%	50.00%	0%
5	**I felt informed about why I was being asked for my view, and the way it would be considered. (Principle 4)**	14.29%	7.14%	42.86%	21.43%	14.29%

Charter Principle 1 - Engagement is genuine

People had faith and confidence in the engagement process

- The engagement process provided an opportunity for any person to identify their issues through a submission (via letter, e-mail or on-line submission through the SA Planning Portal and Council's our Adelaide website) that were reviewed and considered before finalising the Code Amendment.
- Engagement was encouraged by directly contacting key stakeholders including government agencies, community groups, industry representatives and business owners.

Community members were able to provide feedback via

- A website, direct letters, e-mails, contact City of Adelaide employees by telephone and arrange meetings by request.
- The engagement material articulated the policy proposed, potential impacts of the engagement process and how interested persons could provide their feedback. The information provided aimed to be in plain English.
- An interactive map tool was used to spatially illustrate the impacts of the proposed policy.
- The engagement process provided an opportunity for any person to identify their issues through a submission (via letter, e-mail or on-line submission through the SA Planning Portal and Council's our Adelaide website) that were reviewed and considered before finalising the Code Amendment.

The engagement evaluation survey noted that 35% of respondents were unsure if engagement genuinely sought input to shape the proposal. Public engagement occurred at the draft Code Amendment stage where there was an opportunity for feedback to genuinely shape planning policy.

The engagement evaluation survey was conducted following the consultation period, prior to a decision being made on the Code Amendment and engaegment report being published. As such, respondents of the survey would unlikely be aware of how their views were considered and their impact on the the finalisation of the Code Amendment.

Evaluation statement	Strongly disagree	Somewhat disagree	Not sure	Somewhat agree	Strongly agree
I feel the engagement genuinely sought my input to help shape the proposal (Principle 1)	14.29%	14.29%	35.71%	28.57%	7.14%

(2) Engagement is inclusive and respectful

Feedback was received from various people/interested parties, including community groups, industry representatives, business owners, Member of Parliament, government agencies and the public. The feedback was received via written submissions and an online survey. Meetings were also conducted with key stakeholders to ensure understanding of the Code Amendment and their views.

The variety of engagement techniques were considered suitable for the identified stakeholder groups to be informed and provide feedback on the Code Amendment.

The engagement evaluation survey indicated that most respondents were not sure if their views were heard. As previously discussed, due to the timing of the engagement evaluation survey, respondents would have been unclear of how their views had influenced the outcome.

Additional comments in the feedback noted that City of Adelaide employees listened and demonstrated that they heard their views, although they were unsure if views were heard by Council. One respondent noted that they were not contacted following consultation. Written submissions were acknowledged via email. The engagement evaluation survey was sent to those all who provided feedback and contact details. The City of Adelaide Engagement Platform was also updated following consultation.

Evaluation statement	Strongly disagree	Somewhat disagree	Not sure	Somewhat agree	Strongly agree
I am confident my views were heard during the engagement	7.14%	0%	71.43%	14.29%	7.14%

(3) Engagement is fit for purpose

The engagement information aimed to be presented in plain English and included graphical representation of the proposed policy changes, a frequently asked questions page, and supporting written material. An interactive map was provided to illustrate the spatial impacts of the proposed policy. Information was available in hard copy and electronically and interested parties could speak to a representative in person, via phone or email. Information was available from a range of sources, including the Planning SA Portal, City of Adelaide website and Our Adelaide Engagement webpage. The public consultation period was open for six weeks.

The survey results indicate that many of the respondents felt that sufficient information was provided to take an informed view of the decision. One third of the respondents felt that they had sufficient opportunity to be heard. Half of respondents indicated that they were unsure if they were given adequate opportunity to be heard. One respondent expressed concern that key stakeholders weren't consulted prior to public consultation. Two respondents noted that they strongly disagree that they were provided an adequate opportunity to be heard. One of these respondents noted that they only had a week to respond. The public engagement period was six weeks. Given the scale and complexity of the Code Amendment, six weeks is considered a sufficient consultation period. Based on the feedback noted, it is concluded that this respondent was not contacted directly, and as such they were unaware of the start of the public consultation period.

Evaluation statement	Strongly disagree	Somewhat disagree	Not sure	Somewhat agree	Strongly agree
I was given an adequate opportunity to be heard	21.43%	0%	50.00%	21.3%	7.14%
I was given sufficient information so that I could take an informed view	7.14%	7.14%	35.71%	50.00%	0%

(4) Engagement is informed and transparent

All information, including the Code Amendment report, was available to any interested party via the PlanSA portal and the City of Adelaide's Our Adelaide Engagement webpage. Simplified information was made available via an interactive map, FAQs and graphical representation of proposed policies.

Engagement material included information regarding the Code Amendment process and how the Minister would decide on the proposed Code Amendment. As indicated in the responses received, 35% of respondents understood how their views would be considered. Although, it was apparent that there was some uncertainty about how their views would inform the final decision.

Evaluation statement	Strongly disagree	Somewhat disagree	Not sure	Somewhat agree	Strongly agree
I felt informed about why I was being asked for my view, and the way it would be considered.	14.29%	7.14%	42.86%	21.43%	14.29%

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(5) Engagement processes are reviewed and improved

All feedback has been reviewed and considered as part of this Engagement Report. Following Council decision on the Code Amendment correspondence will be provided to each party to inform them of the engagement outcomes and submission of the Code Amendment to the Minister. The City of Adelaide's Our Adelaide Engagement platform will also be updated.

7 Refer to the Minister for Planning and Local Government

On *11 November 2024* the Designated Entity approved the Code Amendment and this Engagement Report to be furnished on the Minister for Planning and Local Government.

Attachments

1 Summary of Written Submissions

2 Evaluation Results

3 Copy of Submissions Received

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Attachment 1 - Summary of Written Submissions

	Stakeholder	Summary	City of Adelaide Administrative Response
1	**SA Police**	No comment	Noted
2	**Environment Protection Authority**	No comment	Noted
3	**Lucy Hood MP Member of Adelaide**	• On behalf of East End Residents advocated for including 'adult products and services premises' and 'adult entertainment premises' in the Planning and Design Code • Advocated for Council to consider Adult Entertainment Code Amendment for the East End • Notes the City of Adelaide Code Amendment, which affects the entire city including Hindley Street, is a council decision.	Acknowledge advocacy on behalf of East End residents. The Code Amendment aims to provide policy to guide the development of these land uses across the city. Applications for Adult Entertainment Premises and Adult Products and Services will be performance assessed. This method allows the City of Adelaide Assessment Manager/Council Assessment Panel to make decisions, ensuring that local issues are effectively addressed.
		• East End Residents strongly oppose the presence of adult entertainment and/or adult products and services venues near the East End and support the proposed Code Amendments. • Residents have requested an increase in the buffer distance from residential areas and locations used for places of worship, child care, and schools.	The Code Amendment lists Adult Entertainment Premises as a non-conforming use within the existing City Living Zones, Rundle Mall Subzone and Rundle Street Subzone that are in the East End. Policy has been included for Adult Entertainment Premises that seeks to: • Guide Adult Entertainment uses to be in areas with compatible land uses and hours of operation and avoid being located at the interface of neighbourhood-type zones • Improve the design and siting of Adult Entertainment Premises to mitigate off-site impacts • Limit advertising • In the Capital City Zone, if adult entertainment premises are proposed near schools, childcare centres and places of worship, they are closed during daytime hours to minimise land use conflicts • Do not operate at the interface of the City Living Zone This policy approach recognises that these land uses are anticipated in a capital city and seeks to manage interface issues.
		Feedback from West End hospitality and accommodation businesses • Concerns regarding Code Amendment effectively confining adult entertainment to the Hindley Street precinct	The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues.

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	Stakeholder	Summary	City of Adelaide Administrative Response
		• A specific zone for adult entertainment venues risks creating the impression of a "red light district" within the CBD	Replacement of the buffer distances and additional policies to guide Adult Entertainment premises to be in areas with compatible land uses and hours of operation.
		Feedback from Sex Industry Network (SIN) • Concerns related to the Hindley Street Zone creating a perceived 'red light district"	The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues. Replacement of the buffer distances and additional policies to guide Adult Entertainment premises to be in areas with compatible land uses and hours of operation.
4	**A Watson**	• Support Code Amendment • Important in terms of management and maintain social amenity to restrict the area for adult entertainment venues. • Makes supervision and compliance oversight of risk much easier. • "Amenity of other city areas and the peaceful environments of residential areas can be enhanced"	Noted. Policy guides adult entertainment premises to locate in areas with compatible land uses and hours of operation.
5	**East End Presiding Officers Group –** N Scarvelis, Dr L Ryan, G Woollard B Holton, K Hooey, C Cann, V Schulz, F Beauchamp, D Hill, D Simmons, M Young, B Jenner, R Wiskich, I Pasoce, J Linn, D Williams	• Strongly opposed to any Adult Entertainment and/or Adult Products and Services venues in or near the East End precinct. • We therefore strongly support both proposed Code Amendments, in respect to both Adult Entertainment Premises and Adult Products and Services Premises. • Recommend a variation to both proposed amendments, as follows: increase the buffer distance from existing residential uses or land used for a place of worship, childcare centre, primary school or secondary school from 50 metres to at least 100 metres, but preferably 200 metre.	Acknowledge support for the Code Amendment. The Code Amendment lists Adult Entertainment Premises as a non-conforming use within the existing City Living Zones, Rundle Mall Subzone and Rundle Street Subzone that are in the East End. Policy has been included for Adult Entertainment Premises that seeks to: • Guide Adult Entertainment uses to be in areas with compatible land uses and hours of operation and avoid being located at the interface of neighbourhood-type zones • Improve the design and siting of Adult Entertainment Premises to mitigate off-site impacts • Limit advertising • In the Capital City Zone, if adult entertainment premises are proposed near schools, childcare centres and places of worship, they are closed during daytime hours to minimise land use conflicts • Do not operate at the interface of the City Living Zone This policy approach recognises that these land uses are anticipated in a capital city and seeks to manage interface issues.

	Stakeholder	Summary	City of Adelaide Administrative Response
6	**D Williams**	• For health, safety and best management that the Hindley Street precinct should be the only area for adult entertainment and services in the City. • I agree with therefore strictly limiting where such services should be. They definitely must not be allowed where residents, churches, schools exist." • Propose extending the buffer to 100 metres to secure the safety, the liveability and overall health of residents and workers for now and into the future as the city grows and develop. • New facilities only to be allowed in Hindley Street precinct and existing premises not within Hindley precinct will not be allowed to extend their current leases.	The Code Amendment lists Adult Entertainment Premises as a non-conforming use within the existing City Living Zones, Main Street Zones (excluding Hindley Street Subzone) and Melbourne Street West Subzone. Policy has been included for Adult Entertainment Premises that seeks to: • Guide Adult Entertainment uses to be in areas with compatible land uses and hours of operation and avoid being located at the interface of neighbourhood-type zones • Improve the design and siting of Adult Entertainment Premises to mitigate off-site impacts • Limit advertising • In the Capital City Zone, if adult entertainment premises are proposed near schools, childcare centres and places of worship, they are closed during daytime hours to minimise land use conflicts • Do not operate at the interface of the City Living Zone This policy approach recognises that these land uses are anticipated in a capital city and seeks to manage interface issues. Leasing and tenure of Adult Entertainment Premises are beyond the scope of the Code Amendment.
7	**Adult Bliss Erotica**	• Unsupportive of the Code Amendment. • Adult entertainment businesses are important to the local economy. • Implementing restrictive planning policies could lead to the closure of many businesses, resulting in significant job losses and economic downturn for the industry. • Displacing these businesses to less visible areas might increase unregulated activities, which could pose greater risks to public safety.	Noted, the proposed policy changes do not impact on the rights of existing approved premises to continue operating. The policies are designed to recognise that these land uses are anticipated in a capital city and seeks to manage interface issues. The policy framework has been amended following consultation and the existing Hindley Street Subzone and Capital City Zone are considered appropriate locations for Adult Entertainment venues, subject to meeting specific policies.
		• The adult entertainment industry offers cultural and social value by hosting community events and providing diverse entertainment options, enhancing Adelaide's vibrancy and appeal.	Noted, the proposed policy changes do not impact on the rights of existing approved premises to continue operating. The policies are designed to recognise that these land uses are anticipated in a capital city and seeks to manage interface issues.
		Instead of implementing restrictive planning policies, recommend the following: 1. Engage with Industry Stakeholders	Engagement has occurred with stakeholders during the engagement on the Code Amendment in accordance with the Community Engagement Charter.

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	Stakeholder	Summary	City of Adelaide Administrative Response
		2. Enhance Current Regulations: 3. Promote Education and Awareness.	Regulation of the industry and education and business promotion is outside the scope of the Code Amendment.
8	**Scarlet Alliance**	The Council's planning code amendments, which aim to restrict purpose-built strip clubs to the existing limited locations and prevent new venues or renovations, represent a political stance against new strip clubs. By treating fixed-site adult entertainment venues differently from other permanent entertainment venues solely due to their involvement in explicit sex work (such as stripping), the Council is discriminating against individuals engaged in sex work.	Since the introduction of the definition for Adult Entertainment Premises and Adult Product and Services Premises in the Code, there has been no specific policy to guide the development of these uses (as they no longer can be referred to as licensed premises under the Code). The proposed policy changes do not impact on the rights of existing approved premises to continue operating. The policies are designed to recognise that these land uses are anticipated in a capital city and seeks to manage interface issues.
		The proposal would: • Prevent assessment of adult entertainment, products and services premises development applications outside Hindley Street Subzone. • Entrench the adult entertainment industry duopoly in the Hindley Street Subzone for the foreseeable future. • Stigmatise workers in adult entertainment venues.	The existing Hindley Street Subzone and the Capital City Zone are considered appropriate locations for Adult Entertainment venues, subject to assessment. The amended policy seeks adult entertainment premises to be located in areas with compatible uses and similar hours of operation (e.g licensed venues).
		The Code Amendment would create numerous negative impacts on work health and safety in Adult Entertainment Premises, and the safety of visitors. Work Health and Safety approaches are now the primary means of regulating sex work in the decriminalised states and territories; NSW, Victoria, Northern Territory and Queensland.	Noted. The Code Amendment include requirements that Adult Entertainment Premises minimise alcoves and entrapment, provide adequate entry and exit lighting and visibility, and reception and visitor assessment areas consider safety and security of employees and visitors. These requirements seek to improve the safety of adult entertainment venues for employees and visitors. Internal fit outs and work health and safety measures of the venues is beyond the scope of the Code Amendment and the Planning and Design Code.
		Anti-sex work policy result in discrimination, stigmatisation, and potential corruption in the planning process and lead to the disregard of planning staff expertise and reasonable development proposals for sex industry premises.	Noted.
		Critical of the consultation process for the code amendment not aligning with the spirit of South Australia's planning engagement policies.	The City of Adelaide met all mandatory requirements of the Engagement Charter and consultation was in accordance with an approved Engagement Plan. Consultation involved letters to owners/operators who held a prescribed entertainment license, key industry stakeholders and

	Stakeholder	Summary	City of Adelaide Administrative Response
			government agencies. An advertisement was also placed in the Government Gazette and Advertiser newspaper.
		The code amendment would worsen the concentration of ownership of adult entertainment venues in South Australia and should be rejected for that reason. The proposal discourages the development of new, purpose-built adult entertainment venues in Adelaide, favouring a gig economy model over stable employment in the industry. Scarlett Alliance argues that adult entertainment workers need more options and that the amendment would unfairly push them into precarious gig work, compromising workplace health, safety, and human rights.	The existing Hindley Street Subzone and Capital City Zone are considered appropriate location for adult entertainment venues subject to assessment. The Code Amendment does not restrict development of new premises, the policy seeks to manage interface issues and adult entertainment premises to be located in areas with compatible uses and similar hours of operation (e.g licensed venues).
9	**Sex Industry Network (SIN)**	Strongly opposes the proposed changes to the Planning and Design Code.	Acknowledge opposition to the Code Amendment.
		The restrictive nature of these amendments will negatively impact our community's industrial rights, safeguards, health, and wellbeing.	Noted. The policy framework has been amended to focus on managing interface issues and improving the design and siting of Adult Entertainment Premises.
		The Adelaide City Council has provided an interactive map for the purposes of investigating the impact of proposed "buffer zones" for Adult Industry premises use or development. When using the interactive map provided by the Adelaide City Council it becomes apparent that these amendments are nothing more than a thinly veiled ban on adult entertainment establishments.	Noted. The existing Hindley Street Subzone and the Capital City Zone are considered appropriate locations for Adult Entertainment venues, subject to assessment and appropriate management of interface issues. References to setback distances from other land uses has been removed.
		Code amendments will confine adult entertainment premises and their workers to restricted areas, negatively affecting their safety, rights, and agency. The only viable location for new purpose-built venues would be the Hindley Street sub-zone, potentially creating a red-light district. Such a red-light district could exacerbate stigma and discrimination and reinforce the duopoly of ownership of strip clubs.	The existing Hindley Street Subzone and the Capital City Zone are considered appropriate locations for Adult Entertainment venues, subject to assessment and appropriate management of interface issues. References to setback distances from other land uses has been removed.
		The amendments conflict with the Adelaide City Council's 2023 $15 million investment in transforming Hindley Street into a family-friendly area, is a contradiction and absurd misuse of taxpayer funds.	The City of Adelaide's Hindley Street revitalisation seeks to widen footpaths, improve street lighting and CCTV, plant additional trees and create more space for outdoor dining to encourage active daytime businesses. The project seeks to improve the street for all users.
		Recommend removal of terminology "premises used for prostitution" from the planning code as while full-service sex work is currently	Noted.

	Stakeholder	Summary	City of Adelaide Administrative Response
		criminalised it will present future planning code issues when South Australia inevitably updates sex industry laws.	Updating the definition of Adult Products and Services premises is beyond the scope of this Code Amendment.
		If discarding the amendments is not feasible, SIN suggests removing the proposed buffer zones and/or the language used in the explanation and delineation of the buffer zones. We suggest amending the wording to indicate certain restrictions apply during the "business hours" of prescribed premises, for example, adult entertainment premises must restrict all external advertising during the "business/opening hours" of prescribed premises (schools, child care centres, places of worship) or adult entertainment premises must restrict all external advertising during 8am and 6pm, for example. Again, if discarding the amendments is not feasible, we would also like to suggest a revision to and extension of the allocated sub-zone. Certain streets in the city centre, predominantly the business district, should be included in the allocated provisions for land use and design for adult entertainment venues. Currie, Waymouth, and Franklin Streets are not residential and may be flagged for use. Certain sections of King William Street, Pirie, and Flinders Streets may also be appropriate.	The Code Amendment was amended following consultation. The 'buffer policy' referencing setback distances to other land uses was removed and replaced with additional written policy. Policy has been included for Adult Entertainment Premises that seeks to: • Guide Adult Entertainment uses to be in areas with compatible land uses and hours of operation and avoid being located at the interface of neighbourhood-type zones • Improve the design and siting of Adult Entertainment Premises to mitigate off-site impacts • Limit advertising • In the Capital City Zone, if adult entertainment premises are proposed near schools, childcare centres and places of worship, they are closed during daytime hours to minimise land use conflicts • Do not operate at the interface of the City Living Zone This policy approach recognises that these land uses are anticipated in a capital city and seeks to manage interface issues.
10	**General Managers of West End**	We are extremely concerned by the decision to omit Hindley Street from this buffer zone, reinforcing the negative perceptions that have long held back the development of this part of the city. This distinction from the rest of the city is in effect a sanctioning of a redlight district in Adelaide's West End.	Noted The Code Amendment was amended following consultation. The 'buffer policy' referencing setback distances to other land uses was removed and replaced with additional written policy.
		Hindley Street faces high vacancy rates and disrepair, yet it is central to Adelaide's tourism hub, with many international hotels, a convention centre, a medical precinct, and a major stadium. The condition and tenant mix of Hindley Street affect Adelaide's reputation locally and internationally. The street serves a diverse range of visitors, including experts attending conferences, corporate travellers, families, not just 18-24 years for a few hours on the weekends. With the highest vacancy rate in the city and with some visitors only attending their hotel and place for the purpose of their travel, do we want a red-light district to represent Adelaide, South Australia A complete review of the planning policy and its applications to Hindley Street should occur.	The scope of this Code Amendment is planning policy relating to Adult Entertainment Premises and Adult Product and Services. Reviewing the zoning and policy requirements of Hindley Street is beyond the scope of this Code Amendment. The City of Adelaide will consider other policy amendments through its Code Amendment Program.

	Stakeholder	Summary	City of Adelaide Administrative Response
11	**The North Adelaide Society Inc**	Each proposed "Adult" land use is directed to an "adult" age-based cohort and purpose, and ought not be permitted, or capable of being permitted, to be at a location, or in a precinct, zone or area that is not for that purpose (i.e., an "adult" only age-based land use).	Noted.
		Neither "adult" land use (premises / services) ought to be permitted within: a) Adelaide Park Lands b) City Living c) City Main Street (incl. Melb. Street West) d) Community Facilities e) That part of the Capital City that is contiguous with, or immediately adjacent to, the above zone/s or localities f) City Riverbank and other zone within the care and control of a government entity. "Adult" land uses ought not at any time or in any respect: be in a location or zone that may result in direct, indirect, transient or accidental visual or physical interaction with pre-school and school age children, and non-adults; be within a 100 metre buffer zone of a land use incompatible with an "adult" only land use (e.g., Park Land; place of worship, childcare centre, school, residential, main street).	Noted. The existing Hindley Street Subzone and the Capital City Zone are considered appropriate locations for Adult Entertainment venues, subject to assessment and appropriate management of interface issues.
		Subject to the buffer zone indicated herein, it is acknowledged that currently the Hindley Street zone is primarily known as an 'adult' based land use, albeit not confined to an "adult" only age-based cohort and purpose. Presumably, appropriate planning conditions will be imposed. To provide certainty of effect and intent, the language and expressions used in the draft code amendment ought to be clear and unambiguous	Noted. The scope of this Code Amendment is planning policy relating to Adult Entertainment Premises and Adult Product and Services. The Code Amendment introduces specific policy to assess these land uses. When development applications are submitted for Adult Products and Services Premises and Adult Entertainment Premises, they will be assessed against all relevant requirements of the Planning and Design Code including requirements related to advertising, noise, design and zoning requirements. If granted approval, applicable conditions will be placed.
12	**West End Association**	• Perplexed and concerned by the decision to omit Hindley Street from this buffer zone, especially given the significant presence of vulnerable and important tourism and community institutions within and around this area.	Noted. The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment

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	Stakeholder	Summary	City of Adelaide Administrative Response
		• Hindley Street is frequented not only by 18-25 year olds at night but also by families and visitors attending major arts institutions, including underage events at venues like the Hindley Street Music Hall.	premises, subject to assessment and appropriate management of interface issues. References to setback distances from other land uses have been removed.
		• This distinction from the rest of the city is in effect a sanctioning of a redlight district in Adelaide's West End • Reinforces the negative perceptions that have long held back to development of this part of the city • Maintaining this perception has led to the current dire circumstances of the street with the highest vacancy rate of any city main street. • Adverse effects on land values have been expressed to us by concerned landlord	The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues. References to setback distances from other land uses have been removed.
		State Government planning documents describe Hindley Street (east of Morphett Street) as a prime evening and late-night entertainment hub with shopping, hospitality, mixed business, and high-density living. However, this description is outdated, as there is minimal shopping or mixed business left, and evening and late-night venues are only busy 1 to 1.5 nights a week	The scope of this Code Amendment is planning policy relating to Adult Entertainment Premises and Adult Product and Services. Reviewing the zoning and policy requirements of Hindley Street is beyond the scope of this Code Amendment. The City of Adelaide will consider other policy amendments through its Code Amendment Program.
		• Is essential that there is equity in the Council's view of our city, and we believe there cannot be a different rule for the West End alone.	Noted. The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues.
13	J. Hamilton	• This will significantly impact both business and individuals who are both employed by and seek these services.	Noted.
		• Curious whether the proposed changes will affect Fringe venues and other adult entertainment, including cabaret and burlesque, or if the City of Adelaide will ignore these impacts due to their financial significance. There are also questions about whether major theatres hosting 13+ and 18+ events will be exempt from the restrictions because they are not "strip clubs."	When the Planning and Design Code was introduced in 2021, it did not include definitions for 'adult entertainment premises' or 'adult products and services premises'. Consequently, these land uses were categorised as 'licensed premises' and 'shop'. In June 2023, definitions for these premises were introduced into the Code. The purpose of this Code Amendment is to introduce policies to address the land use. The Code Amendment applies to land uses that require a development application. The proposed changes do not include premises where sexually explicit entertainment is undertaken temporarily and in a private or ticketed event

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	Stakeholder	Summary	City of Adelaide Administrative Response
			space. These uses are likely to be considered ancillary to the primary use of the venue as a theatre, event space, bar etc and do not trigger a need for a development application. Therefore, it is unlikely that most Fringe Shows that operate under the above conditions, will be impacted.
		• The ad nauseum for "venues to affect schools and childcare" is a joke - none of the current or proposed venues are within that context. Many city-based artists who use these services daily are also aware of the discrimination faced in their professions.	Noted.
		• The City of Adelaide's claim to support a vibrant city with a thriving night-time economy is undermined by the recent closure of several long-term entertainment venues, with no support or clear guidance from the council.	Noted.
		• The council's actions to further regulate the arts and entertainment sector while promoting the Fringe Festival seem contradictory and gross misuse of council power.	The Code Amendment does not propose to preclude or stop Adult Entertainment Premises and Adult Products and Services as a land use, it proposes to improve how those land uses are assessed. In June 2023, definitions for these premises were introduced into the Code. The purpose of this Code Amendment is to introduce policies to address the land use.
14	**South Australian Stripper Hub (SASH) (late submission)**	South Australia Stripper Hub (SASH) maintains that sex work is valid employment and provides valid services in all its forms	Noted.
		SASH welcomes policies and reform which supports greater safety, well-being, and autonomy for workers, including that which seeks to actively counter stigmatisation and marginalisation which harms workers in the sex industry (the Industry).	Noted.
		The Live Adult Entertainment landscape at present is dominated by a duopoly operating three of the four venues in Adelaide's CBD. SASH would like to note that confining Adult Entertainment premises to the Hindley Street Subzone would further entrench the hold the duopoly has over the industry; consolidating their free rein to dictate industry norms which significantly impact workers and clientele.	Noted. The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues. Buffer distances are replaced with additional written policies to guide development assessment.
		The Code Amendment would significantly limit suitable land for adult entertainment venues, reducing competition and potentially lowering standards for workers. This could discourage voluntary compliance with workplace health and safety (WHS) obligations, worsening	Noted. Work health and safety measures of the venues is beyond the scope of the Code Amendment and the Planning and Design Code.

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	Stakeholder	Summary	City of Adelaide Administrative Response
		power imbalances between venue owners and workers and undermining efforts by SafeWork SA and SASH to encourage proactive WHS practices and shift industry norms.	
		• City of Adelaide Strategic Plan (2024 – 2028)3 espouses values of inclusivity, equality, and safety, the Code Amendment indicates these ideals do not extend to sex workers in the community. The Code Amendment also reflects multiple methods by which local and state Governments have historically been unsupportive of sex workers	When the Planning and Design Code was introduced in 2021, it did not include definitions for 'adult entertainment premises' or 'adult products and services premises'. Consequently, these land uses were categorised as 'licensed premises' and 'shop'. In June 2023, definitions for these premises were introduced into the Code. The purpose of this Code Amendment is to introduce policies to address the land use.
		• The Code Amendment would in practice further restrict sex workers and reinforce stigmatising rhetoric which propagates harm against them	Noted. Policy has been included for Adult Entertainment Premises that seeks to: • Guide Adult Entertainment uses to be in areas with compatible land uses and hours of operation and avoid being located at the interface of neighbourhood-type zones • Improve the design and siting of Adult Entertainment Premises to mitigate off-site impacts • Limit advertising • In the Capital City Zone, if adult entertainment premises are proposed near schools, childcare centres and places of worship, they are closed during daytime hours to minimise land use conflicts • Do not operate at the interface of the City Living Zone This policy approach recognises that these land uses are anticipated in a capital city and seeks to manage interface issues.
		Where the presence of Adult Entertainment and Product and Services premises is sought to be contained by the Code Amendment, there are alternatives to restricting land use. Adult Entertainment venues can exercise discretion, for example if advertising during daytime hours (e.g., 7am to 5pm) was to limit or exclude adult themes, or by limiting their venue advertising to include only the businesses' hours. Another option includes Adult Entertainment businesses refraining from advertising during the daytime (where the business itself is not open during daytime hours), or during opening hours of nearby premises (such as schools, childcare centres). Please note that where restrictive advertising is still discriminatory in effect towards sex workers, it presents a safer alternative to the proposed limitations on land use.	Noted. The references to setback differences to other land uses has been removed post consultation. The proposed policy framework seeks to limit advertising and guide hours of operations to minimise the impact of adult entertainment premises on the amenity of a locality.

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	Stakeholder	Summary	City of Adelaide Administrative Response
		The City Council of Adelaide proceeds in implementing the Code Amendment, SASH asks “areas where the land use is allowed” be added beyond solely the Hindley Street Subzone. This extension would allow more opportunity for prospective venues and greater agency for workers in line with our concerns. While Hindley Street presently acts as a ‘hub’ of Adelaide’s nightlife, it is not necessarily the most nor only suitable Subzone for Adult Entertainment, nor Products and Services venues.	The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues. In the existing Capital City Zone and Main Street Zones (and associated Subzones), adult products and services premises would be considered appropriate subject to meeting specific policies. The policy proposed in the Code Amendment would mean Adult Products and Services Premises are not considered to meet performance outcomes in the existing City Living Zones.
		We recommend extending beyond just the Hindley Street Subzone, this could include Currie, Waymouth, Franklin, Rundle, Pirie and Flinders Streets, in addition to sections of King William Road. Pertaining to the East End of the CBD, it is worth noting the ongoing success of Fringe shows produced by and featuring the talents of sex workers. Where adult entertainment has been recognised and awarded during Fringe season, there is some hypocrisy in classifying this Subzone as “unsuitable” during all other times of the year.	Noted. The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues.
15	**E Rushbrook**	Adult entertainment is not an appropriate land use along either side of Hutt Street from South Terrace to Bartels Road, Adelaide. This applies no matter which zone applies to Hutt Street, such as main street, capital city zone, or city living zones.	Noted.
		Inappropriate to suggest that adult entertainment and adult products and service premises could be safely regulated based on distance from a nominated type of premises in some zones along Hutt Street. Firstly, it is a complex and challenging schema for the residents (and others) to understand. Secondly, it isn't easy to implement.	Buffer distances are replaced with additional written policies to guide development assessment. The policy was amended to strengthen policies relating to advertising, interface and hours of operation to help guide the development of these land uses.
		Regulations and planning policy is complex - responsibility of different bodies and their underpinning legislation. This will undoubtedly lead to confusion about who regulates what. I also note that using the Internet and home-based entertainment may reduce the need for adult entertainment zones.	Noted. When the Planning and Design Code was introduced in 2021, it did not include definitions for 'adult entertainment premises' or 'adult products and services premises’. Consequently, these land uses were categorised as 'licensed premises' and 'shop'. In June 2023, definitions for these premises were introduced into the Code. The purpose of this Code Amendment is to introduce policies to address the land use.
16	**East End Coordination Group**	• Strongly support Code Amendments • Recommend increase the ‘buffer distance’ from existing residential uses or land used for a place of worship, childcare	Acknowledges support of the Code Amendment.

	Stakeholder	Summary	City of Adelaide Administrative Response
		centre, primary school or secondary school from 50 metres to a minimum of 200 metres.	Replacement of the buffer distances and additional policies to guide Adult Entertainment premises to be in areas with compatible land uses and hours of operation.
		Support of expanding the boundary of our East End Adelaide "City Main Street" to include Pirie Street to the South, East Terrace to the East and Pulteney Street to the West. With the objective of State Government and Adelaide City Council looking to double the residential population of our City, it is more apparent than ever that forward planning and design, to suit the use and classification of our precinct as "City Living", be implemented into strategic plans and of course premises code amendments.	The scope of this Code Amendment is planning policy relating to Adult Entertainment Premises and Adult Product and Services. Reviewing the zoning and policy requirements of Hindley Street is beyond the scope of this Code Amendment. The City of Adelaide will consider other policy amendments through its Code Amendment Program.
17	**Adelaide Oval**	• No comment	Noted.
Our Adelaide Online Survey Submissions			
18	**Our Adelaide Submission**	Support the Code Amendment The boundary for City Living should be extended into consideration for upcoming potential investment into wider city living areas, like in the West-North corner of the CBD. The West End has gained significant investment through gov and local business owner to activate the area, with further city living expansion taking place around the Light Square district with more than 2,000 new residents moving into that area in the coming months with more apartment living opportunities. Please consider covering future city living areas to future proof.	The scope of this Code Amendment is planning policy relating to Adult Entertainment Premises and Adult Product and Services. Reviewing the zoning and policy requirements of Hindley Street is beyond the scope of this Code Amendment. The City of Adelaide will consider other policy amendments through its Code Amendment Program.
19	**Our Adelaide Submission**	I live in the City and I don't want any expansion of sexually explicit premises anywhere in the City.	Noted. The Code Amendment does not propose to preclude or stop Adult Entertainment Premises and Adult Products and Services as a land use, it proposes to improve how those land uses are assessed.
		Simply – no Premises within the Adelaide City Centre will be granted permission to build or operate any sexually explicit Adult Entertainment	Noted. The Code Amendment does not propose to preclude or stop Adult Entertainment Premises and Adult Products and Services as a land use, it proposes to improve how those land uses are assessed.
20	**Our Adelaide Submission**	Do not support the Code Amendment Create safe areas for sex workers	Noted. The Code Amendment does not propose to preclude or stop Adult Entertainment Premises and Adult Products and Services as a land use, it proposes to improve how those land uses are assessed.

	Stakeholder	Summary	City of Adelaide Administrative Response
21	**Our Adelaide Submission**	The suggestion of buffer zones around certain land uses and the proposal of Hindley Street as a 'red light district' promotes a conservative approach to the adult entertainment industry, creating a culture of secrecy and shame further contributing to archaic social norms that reproduce patriarchal violence, in direct opposition to the progressive, open and inclusive city Adelaide should be aiming for.	Buffer distances are replaced with additional written policies to guide development assessment. Policy has been included for Adult Entertainment Premises that seeks to: • Guide Adult Entertainment uses to be in areas with compatible land uses and hours of operation and avoid being located at the interface of neighbourhood-type zones • Improve the design and siting of Adult Entertainment Premises to mitigate off-site impacts • Limit advertising • In the Capital City Zone, if adult entertainment premises are proposed near schools, childcare centres and places of worship, they are closed during daytime hours to minimise land use conflicts • Do not operate at the interface of the City Living Zone This policy approach recognises that these land uses are anticipated in a capital city and seeks to manage interface issues.
		Restricting the use of land for adult products and services premises disregards the safety of workers and the volume of people who deserve inclusive and safe access to adult products and services. Sex is a basic human right and need for wellbeing and health. It should be promoted as such rather than restricted in its place and advertisement.	Noted. Adult Products and Services premises are not considered to meet performance requirements of the Code in the existing City Living Zone.
22	**Our Adelaide Submission**	Do not support Code Amendment Perhaps legislation that makes it easier for venues to open and stay open would be preferable? If the council is unable to provide this, perhaps legislation that protects the women who provide this entertainment would be a bare minimum	Noted. Legislation change is beyond the scope of this Code Amendment.
23	**Our Adelaide Submission**	It could negatively impact my industry and the community	Noted. The policy framework has been amended in response to the consultation process.
		Just don't do it	Noted. The policy framework has been amended in response to the consultation process.
24	**Our Adelaide Submission**	These proposed changes will negatively impact sex workers and strippers trying to earn a living. This further stigmatises them and makes it intentionally difficult for them to work safely and easily.	Noted. The proposed policy changes do not impact on the rights of existing approved premises to continue operating.

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	Stakeholder	Summary	City of Adelaide Administrative Response
			The policies are designed to recognise that these land uses are anticipated in a capital city and seeks to manage interface issues.
25	**Our Adelaide Submission**	Do not support the Code Amendment Support a safer environment for strippers and burlesque performers rather than outright banning the activity	Noted. The proposed policy changes do not impact on the rights of existing approved premises to continue operating. The policies are designed to recognise that these land uses are anticipated in a capital city and seeks to manage interface issues. The Code Amendment include requirements that Adult Entertainment Premises minimise alcoves and entrapment, provide adequate entry and exit lighting and visibility, and reception and visitor assessment areas consider safety and security of employees and visitors. These requirements seek to improve the safety of adult entertainment venues for employees and visitors. Internal fitouts and work health and safety measures are beyond the scope of the Code Amendment and the Planning and Design Code.
26	**Our Adelaide Submission**	Support Code Amendment I wish to maintain the quiet enjoyment of our area	Noted.
27	**Our Adelaide Submission**	To keep Adult Entertainment Premises out of the East End	The Code Amendment lists Adult Entertainment Premises as a non-conforming use within the existing City Living Zones, Rundle Mall Subzone and Rundle Street Subzone that are in the East End.
28	**Our Adelaide Submission**	I am a long-term resident of East End of Adelaide. This is a long-established, quality residential area complemented by a quality mix of retail, services, and hospitality. The area attracts a diverse demographic and has strong appeal to women of all ages, and families. It is important to keep the area attractive and safe for residents and visitors. Also, as the East End is the hub of events in Adelaide and South Australia it is essential to provide local, national, and international visitors with a positive impression of the precinct.	Noted The Code Amendment lists Adult Entertainment Premises as a non-conforming use within the existing City Living Zones, Main Street Zones (excepting Hindley Street subzone) and Melbourne Street West Subzone. Additional policy has been included for Adult Entertainment Premises the Policy has been included for Adult Entertainment Premises that seeks to: • Guide Adult Entertainment uses to be in areas with compatible land uses and hours of operation and avoid being located at the interface of neighbourhood-type zones • Improve the design and siting of Adult Entertainment Premises to mitigate off-site impacts • Limit advertising • In the Capital City Zone, if adult entertainment premises are proposed near schools, childcare centres and places of worship, they are closed during daytime hours to minimise land use conflicts

	Stakeholder	Summary	City of Adelaide Administrative Response
			• Do not operate at the interface of the City Living Zone This policy approach recognises that these land uses are anticipated in a capital city and seeks to manage interface issues.
		It will address a gap in the current Code and provide greater clarity for Development Applications for Adult Premises.	Noted.
		A 50 metre distance is hardly a buffer zone as the proposed premises could still be located within the same city block as the above uses. Therefore, the buffer zone should be 200 metres.	Noted. Buffer distances are replaced with additional written policies to guide development assessment.
29	**Our Adelaide Submission**	I wouldn't like to see such venues near to where I live. The areas designated as living zones do not include the parts of Adelaide that have the highest density of residents. That is the huge number of apartment buildings in the north west of the city. These contain both elderly residents and young students who do not mix very well with the sort of people attending adult entertainment.	Noted. The Code Amendment lists Adult Entertainment Premises as a non-conforming use within the existing City Living Zones, Main Street Zones (excepting Hindley Street subzone) and Melbourne Street West Subzone.
30	**Our Adelaide Submission**	As long as there is both discrete and non-obvious signage and appropriate security, I think these business are non-intrusive and do not cause an issue	Noted. The Code Amendment includes policy to ensure advertising is discrete and limited in size, scale and number.
		I would like these business to be discrete and low visibility, as these are normally more visible.	Noted. The Code Amendment includes policy to ensure advertising is discrete and limited in size, scale and number.
31	**Our Adelaide Submission**	We should be like other cities and be promoting our night adult entertainment …not everyone wants to go to Hindley Street ..mature age people like to be discreet and go to other parts of the city .	The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues.
32	**Our Adelaide Submission**	Do not support the Code Amendment.	Noted.
33	**Our Adelaide Submission**	Support the Code Amendment in part. A buffer distance should also apply to adult products and services premises; location should be 100 metres from residential or land used for a place of worship and to 200m for schools and childcare centres.	Noted. Replacement of the buffer distances and additional policies to guide Adult Entertainment premises to be in areas with compatible land uses and hours of operation.
34	**Our Adelaide Submission**	Do not support the Code Amendment.	Noted.

	Stakeholder	Summary	City of Adelaide Administrative Response
35	**Our Adelaide Submission**	Do not support the code Amendment Realistically, with the proposed distance requirements, is there anywhere in the CBD that an adult entertainment venue would be allowable? I would suggest reducing this distance requirement or considering additional locations outside of simply Hindley Street. How do these proposed changes sit in line with festival season, for example Adelaide Fringe? Will venues that host shows be subject to same requirements, if the reasons for these are genuine?	Noted. The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues. A development application is not often required for venues where sexually explicit entertainment is undertaken temporarily and in a private or ticketed event space. These uses are likely to be considered ancillary to the primary use of the venue as a theatre, event space, bar etc Therefore, it is unlikely that most Fringe Shows that operate under the above conditions, will be impacted.
36	**Our Adelaide Submission**	Support Code Amendment. Resident of East End.	Noted.
Other Submissions			
	Letter to Members of Parliament and Legislative Council (distributed by 90 individuals)	Oppose the proposed code amendments.	Noted.
		Preventing the development of new strip clubs will negatively impact adult entertainers' ability to earn an income, reduce health and safety at work, is blatant discrimination and promotes stigma against sex workers.	Noted. The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues.
		Combating gender-based violence and promoting respect for women includes ensuring adult entertainers are treated with dignity and have safe working conditions.	Noted. Internal fitouts and work health and safety measures are beyond the scope of the Code Amendment and the Planning and Design Code.
		Catering to a small number of homeowners and restricting new strip clubs while not affecting temporary venues like Fringe and Feast Festival highlights a lack of fairness and double standard.	Noted. The policy was amended and proposes the existing Capital City Zone and Hindley Street Subzone, as appropriate locations for adult entertainment premises, subject to assessment and appropriate management of interface issues. A development application is not often required for venues where sexually explicit entertainment is undertaken temporarily and in a private or ticketed event space. These uses are likely to be considered ancillary to the primary use of the venue as a theatre, event space, bar etc Therefore, it is unlikely that most Fringe Shows that operate under the above conditions, will be impacted.

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Attachment 2 - Evaluation Results

Results of the community minimum mandatory evaluation indicators

	Evaluation statement	Strongly disagree	Somewhat disagree	Not sure	Somewhat agree	Strongly agree
1	**I feel the engagement genuinely sought my input to help shape the proposal (Principle 1)**	7.14%	0%	71.43%	14.29%	7.14%
	Comments: 2 responses *"The staff were very friendly, however we are concerned that the workers rights implications of the proposal have been buried by Councillors who are more interested in keeping East End residents happy."* *"I heard about this from a 3rd party and had to reach out to the concerned parties on my own"*					
2	**I am confident my views were heard during the engagement (Principle 2)**	7.14%	0%	71.43%	14.29%	7.14%
	Comments: 2 responses *"The staff listened and demonstrated they heard our views, however we are yet to see if the Council as a representative body is at all interested in the negative impacts of the proposal. Uncertain if our views were heard where it mattered."* *"No one got back to me?!"*					
3	**I was given an adequate opportunity to be heard (Principle 3)**	21.43%	0%	50.00%	21.30%	7.14%
	Comments: 3 responses *"We should have adult entertainment venues all over Adelaide ...there is a market for these venues"* *"The staff listened and were respectful. However it is still surprising that the issue made it as far as a proposal without consultation BEFORE hand. The prioritisation of East End interests over the workers in Adult Entertainment (not just venues, but festivals, one-night shows, one-off events etc) remains a major concern"* *"I was given less then a week"*					
4	**I was given sufficient information so that I could take an informed view.(Principle 3)**	7.14%	7.14%	35.71%	50.00%	0%
	Comments: 3 responses *"We need to be open minded not have old council members who live a sheltered life not to support these venues"* *"I would have preferred to know more about the proposal prior to it being mooted with government"* *"No one seems to be providing any actual evidence for the proposal, seems like a witch hunt to me!"*					
5	**I felt informed about why I was being asked for my view, and the way it would be considered. (Principle 4)**	14.29%	7.14%	42.86%	21.43%	14.29%
	Comments: 3 responses *"We need another adult cinema , male sex venue , open minded adult stores and more strip clubs"* *"I had to become an expert on planning law in order to realise that the wording in the proposal did not match the impact of the proposal."* *"Again, no one contacted me after"*					

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Results and Evaluation of Designated Entity's engagement

The engagement was evaluated by Colleen McDonnell, Manager City Planning & Heritage
Park Lands Policy & Sustainability, City of Adelaide

	Evaluation statement	Response options
1	Engagement **occurred early enough** for feedback to genuinely influence the planning policy, strategy or scheme **(Principle 1)**	▪ Engaged when there was opportunity for input into first draft • *Early engagement occurred in accordance with the approved Engagement Plan* • *Public engagement occurred at the draft Code Amendment stage where there was an opportunity for feedback to genuinely shape planning policy.*
2	Engagement **contributed to the substance** of the Code Amendment **(Principle 1)**	• In a significant way *Following public consultation, the policy framework was amended.*
3	The **engagement reached** those identified as the community of interest **(Principle 2)**	• Representatives from most community groups participated in the engagement *The targeted stakeholders were reached, noting twelve responses to direct letters sent.*
4	Engagement included the **provision of feedback to community about outcomes** of their participation	• Formally (report or public forum) • *Following consultation, City of Adelaide's Our Adelaide Engagement webpage was updated to inform respondents of the outcome.* • *Those who made a submission on the draft Code Amendment advised how to access the report when made publicly available (which will detail any proposed amendments and summary of submissions) following the consultation process.* *At the time of completing this evaluation, it is noted that further feedback to the community will be provided following Council decision and decision by the Minister. The City of Adelaide's engagement platform will be updated, and emails will be sent to those who provided feedback advising of outcomes to close the loop.*
5	**Engagement was reviewed** throughout the process and improvements put in place, or recommended for future engagement **(Principle 5)**	• Reviewed and recommendations made in a systematic way • *A review of the engagement process was undertaken at the completion of the consultation process in accordance with endorsed Engagement Plan to gauge the views of those who provided submissions on the Code Amendment engagement process.*
	Identify key strengths of the Charter and Guide	The key strength of the Charter and Guide is that it encourages the engagement process to be reviewed and improved.

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	Identify key challenges of the Charter and Guide	The timing for the feedback evaluation is difficult as it requires communicating with participants before Council has formally endorsed the final position and response. Feedback and closing the loop are valued and should form part of the process, although cannot be reflected in their entirety as part of the Engagement Report.

Evaluation of Designated Entity's engagement against Charter Principles

	Charter Principle	How the engagement approach/ activities met the principle
1	Engagement is genuine	• People were provided the opportunity to participate via website, direct letters, e-mails, contact City of Adelaide emplouues by telephone and arrange meetings by request. • The engagement material articulated the policy proposed, potential impacts the engagement process and how interested persons could provide their feedback. The information provided aimed to be in plain English. • An interactive map tool was also provided to illustrate the spatial application of the policy. • The engagement process provided an opportunity for any person to identify their issues through a submission (via letter, e-mail or on-line submission through the SA Planning Portal and Council's our Adelaide website) that were reviewed and considered before finalising the Code Amendment.
2	Engagement is inclusive and respectful	• Engagement activities tailored to different groups, with key stakeholders contacted directly. • An Engagement Report was prepared summarising the feedback received and how it was used to inform the decision. • Meetings were offered with key stakeholders.
3	Engagement is fit for purpose	• Engagement activities are tailored to different groups. • Identified contact for further assistance, information and advice. • Information provided on how to be involved in engagement process. • The engagement material articulated the policy proposed, potential impacts of the engagement process and how interested persons could provide their feedback. • An interactive map tool was also provided to illustrate the spatial application of the policy.
4	Engagement is informed and transparent	• The City of Adelaide provided information (online and hard copy) in basic language clearly articulating the policy proposed in the draft Code Amendment, potential impacts, the engagement process and how interested persons could provide their feedback/participation. • An interactive map tool was also provided to illustrate the spatial applicaiton of the policy. • An Engagement Report was prepared summarising the feedback received and how it was used to inform the decision. The Engagement Report was made publically available prior to a decision being made. • Identified contact for further assistance, information and advice.
5	Engagement is reviewed and improved	• An Engagement Report was prepared to evaluate the engagement process. • At the conclusion of the engagement process, lessons learned have been identified.

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Attachment 3 – Copy of Submissions Received

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Gabriella Cutri

From: Leonie McNeil
Sent: Friday, 12 July 2024 2:01 PM
To: PDCSA Amendments
Subject: FW: Adult Entertainment Premises Code Amendment - Public Consultation
Attachments: Adelaide Oval.pdf; CoA_Adult Entertainment CA_ Adult Entertainment.pdf; CoA_Adult Entertainment CA_ Adult products.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear City of Adelaide

Thank you, we acknowledge receipt of the email below received on 11th June 2024.

We wish to advise that we do not have any feedback on this matter.

Kind regards
Leonie

Adelaide Oval



This email message and any attachments are confidential and may contain legally privileged information. If you are not the intended recipient of this message please notify the sender immediately by return email, and destroy this message and any attachments. Although the Adelaide Oval SMA Limited has made every endeavour to ensure documents are virus free, you should scan this message for viruses. The Adelaide Oval SMA Limited will accept no liability for any loss that may occur, resulting from your recipient of this message or any attachments. You must not copy or distribute this message or any part of it or otherwise disclose its contents to anyone without the prior consent of the sender.

From: PDCSA Amendments <>
Sent: Tuesday, June 11, 2024 2:38 PM
To: Enquiries <>
Subject: Adult Entertainment Premises Code Amendment - Public Consultation

Please find attached correspondence related to the proposed Adult Entertainment Premises Code Amendment.

Planning and Design Code Amendments
City of Adelaide

CITY OF ADELAIDE
cityofadelaide.com.au

The City of Adelaide acknowledges the Kaurna people as the Traditional Owners of the Country where the city of Adelaide is situated, and pays its respect to Elders past, present and emerging.



Think before you print

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From: david williams Friday, 5 July 2024 1:04 PM
Sent: PDCSA Amendments
To: PDCSA Amendments
Subject:

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I have lived in the East End of the City of Adelaide for approximately 24 years and was President of the EECG for about 10 years.

I have always considered that, for health, for safety and for the best management that the Hindley Street precinct is the best, and should be, the only area for adult entertainment and services in the City.

I agree with therefore strictly limiting where such services should be. They definitely must not be allowed where residents, churches, schools exist.

In the given plans, however, even with the proposed 50meter buffer, areas slip through where such premises could be placed and I consider this totally inappropriate and unsafe. If Council really wants more residents then it must be very sure its planning does not allow for adult entertainment and services to slide into the cracks as demonstrated in its map.

I therefore propose extending the buffer to 100 metres to secure the safety, the liveability and overall health of residents and workers for now and into the future as the city grows and develops.

However, the other possibility is to declare that the above sites and services are to be only in the Hindley precinct, no new facilities are to be allowed outside this area and existing facilities which are at present not within the Hindley precinct will not be allowed to extend their current leases.

Thank you for this opportunity to comment.

Yours faithfully,

David Williams

east end adelaide

EST. 1837

REVEL IN THE CULTURE

15h July 2024

Julie Thomson
Code Amendments Consultation
GPO Box 2252
ADELAIDE SA 5001
Pdcsa.amendments@cityofadelaide.com.au

Dear Julie,

RE: ADULT ENTERTAINMENT PREMISES CODE AMENDMENT

Please accept this submission to the Adult Entertainment Premises Code Amendment on behalf of the 15 traders and residents who make up the East End Coordination Group Committee and all the Stakeholders who live and work in East End Adelaide.

The precinct of East End Adelaide has a vibrant balance of fashion, retail, coffee and premium wine and dine destinations; it is also the residential postcode for over two thousand executives, corporates, students and creatives.

We are strongly opposed to any adult entertainment venues, suppliers or providers of adult entertainment products/services and anything related to this industry, whether it be online, in-house, exhibitions, displays, products or performances operating in or near East End Adelaide.

We strongly support both proposed Code Amendments by the City of Adelaide to Adult Entertainment Premises and Adult Products and Services Premises. We further recommend a variation to both proposed amendments as follows:

To increase the 'buffer distance' from existing residential uses or land used for a place of worship, childcare centre, primary school or secondary school from 50 metres to a minimum of 200 metres.
A distance of 50 metres is not at all adequate to provide a reasonable buffer between a venue or business providing adult entertainment or products etc,. and a school or residential building.

In addition to increasing the buffer zone above, we are also in support of expanding the boundary of our East End Adelaide "City Main Street" to include Pirie Street to the South, East Terrace to the East and Pulteney Street to the West. With the objective of State Government and Adelaide City Council looking to double the residential population of our City, it is more apparent than ever that forward planning and design, to suit the use and classification of our precinct as "City Living", be implemented into strategic plans and of course premises code amendments.

We appreciate the opportunity to provide our submission and look forward to further correspondence when it becomes available.

Yours sincerely

Frank Hannon-Tan
President, East End Coordination Group

EAST END PRESIDING OFFICERS GROUP

Representing 16 Strata and Community Corporations
East End, Adelaide

2 July 2024

The City of Adelaide
Code Amendments Consultation
Attn: Julia Thomson, per email: PDCSA.amendments@cityofadelaide.com.au

Planning and Design Code Amendments
Adult Entertainment Premises *and* Adult Products and Services Premises

This letter is submitted on behalf of sixteen (**16**) Strata and Community Corporations in Adelaide's East End – 9 corporations in Garden East and a further 7 nearby corporations, all of whom have a direct interest in the East End precinct as well the City more generally.

Jointly we represent **712** residential apartments or townhouses, housing a residential population of (up to) approximately 1,400 people, many of whom are long term city residents (some for over 20 years).

We are strongly opposed to any Adult Entertainment and/or Adult Products and Services venues in or near the East End precinct.

We therefore strongly support *both* proposed Code Amendments, in respect to both Adult Entertainment Premises *and* Adult Products and Services Premises.

Further, we recommend a variation to both proposed amendments, as follows:

> **To increase the buffer distance from existing residential uses or land used for a place of worship, childcare centre, primary school or secondary school from 50 metres to at least 100 metres, but preferably 200 metres.**

It is our strong view that a distance of 50 metres is completely inadequate to provide a reasonable buffer between such incompatible premises as "adult" establishments on the one hand and schools, places of worship and private residences on the other.

The rationale for our support of these Code Amendments and our proposed variation is as follows:

We fully recognise that any city of scale, such as Adelaide, should provide a diversity of entertainment venues and cater to all reasonable lifestyle choices. We are therefore not opposed to adult establishments per se.

The need is to balance competing interests to ensure that all sectors of the community can co-exist in relative harmony – which is why successful cities have effective Planning and Design Codes.

Given that the State Government and Adelaide City Council have the stated objective of doubling the residential population of the city, it will now be more necessary than ever to ensure that different precincts within the city are treated differently in terms of planning and design to suit different uses, in order to provide the lifestyle choices to attract those additional residents.

The East End today is a very successful, integrated mixed use precinct that comprises:

- a prime residential neighbourhood
- high end fashion and other quality retail
- professional services, office and other commercial businesses
- sophisticated dining, small bars and other diverse hospitality venues
- a hub for major tourism events such as the Adelaide Fringe, Illuminate Adelaide, Tour Down Under, Three Day Event horse trials, CheeseFest and many other events in the East Park Lands
- proximity to universities and schools
- proximity to the North Terrace cultural institutions, Botanic Gardens and Adelaide Zoo

Premises for Adult Entertainment and Adult Products and Services are clearly incompatible with the nature and character of the East End as it is today.

This is not just about those of us who are residents in and around the East End, it is also about the people who work in the East End, and the many visitors who attend East End events and attractions throughout the year – this includes people of all ages, including families.

In respect to major events attended by national and international visitors, the East End is integral to Adelaide's tourism brand, so it is essential that it is presented in the most favourable light.

Adult establishments are simply incompatible with this, not only in their own right but also as a result of the anti-social behaviour sometimes associated with such venues, particularly in the evening when East End dining and many of the events are in full swing, and later when hospitality workers are going home.

We therefore applaud the proposed Code Amendments and look forward to their implementation, along with our proposed variation to increase the buffer zone to at least 100 metres, but preferably 200 metres.

For further information, please contact:

- Nick Scarvelis:
- Andrew Robertson:

Submitted by the Presiding Officers of the 16 East End strata and/or community corporations listed below:

Presiding Officer	**Corporation**	**Building**	**Residences**
Nick Scarvelis	Community Corp. 20133 Inc.	"Magarey"	29
Andrew Robertson	Community Corp. 20707 Inc.	"Maxwell"	16
Dr Lindsay Ryan	Strata Corp. 13337 Inc.	"The Townhouses"	13
Graham Woollard	Strata Corp. 13516 Inc.	"Ridgway"	37
Bob Holton	Community Corp. 20389 Inc.	"The Square"	19
Kathleen Hoey	Strata Corp. 14014 Inc.	"Brooker"	37
(Ms) Chris Cann	Community Corp. 21058 Inc.	"Union St Apartments"	24
Vern Schulz	Community Corp. 20233 Inc.	"Astoria"	34
Fiona Beauchamp	Community Corp. 20838 Inc.	"Ebenezer Apartments"	40
Diana Hill	Community Corp. 23295 Inc.	"Domain"	63
David Simmons	Community Corp. 22806 Inc.	"Alpha"	46
Mu Young	Community Corp. 23946 Inc.	"Palais"	100
Barry Jenner	Community Corp. 42062 Inc.	"Adelaidean"	74
Robert Wiskich	Community Corp. 20189 Inc	"Botanic"	93
Ian Pascoe	Community Corp. 20863 Inc.	"Brewery"	60
Joanne Linn	Community Corp. 21197 Inc.	"Malthouse"	27

Ms Colleen McDonnell,
Manager City Planning and Heritage,
City of Adelaide

Email PDCSA.amendments@cityofadelaide.com.au

Dear Ms McDonnell

Thank you for your letter bringing to SECRA's attention the proposed Draft Code Amendment on Adult Entertainment and Adult Products and Services. I understand that the Planning and Development Code (The Code) does not currently include a planning policy on where adult entertainment premises or adult products and services premises should be located or assessed within the City of Adelaide. The Code Amendment proposes introducing a policy to improve the assessment of development proposals for adult entertainment and adult products and services premises.

Personally, I believe that :

- Adult entertainment zones are not an appropriate land use along either side of Hutt Street from South Terrace to Bartels Road, Adelaide.
- This applies no matter which zone applies to Hutt Street, such as main street, capital city zone, or city living zones.

This reflects the existing use of Hutt Street.

It is inappropriate to suggest that adult entertainment and adult products and service premises could be safely regulated based on distance from a nominated type of premises in some zones along Hutt Street. Firstly, it is a complex and challenging schema for the residents (and others) to understand. Secondly, it isn't easy to implement.

Hutt Street has commercial (such as Sofia), residential (Rymill House) and medical premises (Hutt Street General Practice), as well as social justice facilities (YWCA affordable housing), all of which may find close location to an adult entertainment and adult products and service premises inappropriate.

It would also compromise Hutt Street branding as a family-friendly retail strip. Schoolchildren may use Hutt Street to walk to school (CBC), as do southeast residents who go for a walk, cycle, or microtransport to the CBD. Visitors walk the street to admire the historical buildings such as the Bray residence.

As if this regulation is not complex enough, regulating other adult entertainment activities is the responsibility of different bodies and their underpinning legislation. This will undoubtedly lead to confusion about who regulates what.

I also note that using the Internet and home-based entertainment may reduce the need for adult entertainment zones.

Therefore, I believe the proposed method of regulating adult entertainment and adult products and service premises along Hutt Street is flawed.

If you should want to discuss the matter further, please email me in the first instance, Elizabeth Rushbrook, at

Yours sincerely

(Signed)

Elizabeth Rushbrook

Date 18 July 2024

Environment Protection Authority
GPO Box 2607 Adelaide SA 5001
211 Victoria Square Adelaide SA 5000
T (08) 8204 2000 F (08) 8204 2020
Country areas 1800 623 445

EPA 866-525

Ms Colleen McDonnell

Manager, City Planning & Heritage

Adelaide City Council

GPO Box 2252

ADELAIDE SA 5001

Dear Ms McDonnell

Adult Entertainment Premises Code Amendment

Thank you for providing the Environment Protection Authority (EPA) with the opportunity to comment on the Adult Entertainment Premises Code Amendment (CA).

The EPA has reviewed the CA to ensure that all environmental issues within the scope of the objects of the *Environment Protection Act 1993* and the State Planning Policies (pursuant to the *Planning, Development, and Infrastructure Act 2016)* are identified and considered. The EPA is primarily interested in ensuring that the proposed rezoning is appropriate and that any potential environmental and human health impacts that would result from future development are able to be addressed at the development authorisation stage.

The EPA provides the following comments for your consideration.

The EPA has no concerns with the proposed code amendment.

For further information on this matter, please contact Scott Douglas

Yours sincerely

Scott Douglas

PRINCIPAL ADVISER, PLANNING POLICY & PROJECTS

PLANNING AND IMPACT ASSESSMENT

ENVIRONMENT PROTECTION AUTHORITY
Date: 23/07/2024

Printed on 100% recycled paper using vegetable-based inks

From: Jaime Hamilton < Friday, 19 July 2024 12:22
Sent: PM
To: PDCSA Amendments
Subject: Opposed - Adult Entertainment Ammendment

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Julia,

I am writing to express my complete disappointment in the City of Adelaide council's proposed changes to the Adult Entertainment Premises Code amendment as this will significantly impact both business and individuals who are both employed by and seek these services.

I am also curious to see how this impacts Fringe venues will the requirements and proposed changes affect cabaret, burlesque and other "adult entertainment" during fringe or is CofA willing to overlook that because it directly affects their bottom line? Including places such as the festival theatre and other major theatres who display work in both a 13+ and 18+ year old capacity - or are they exempt because they aren't "strip clubs".

The ad nauseum for "venues to affect schools and childcare" is a joke - surely as none of the current or proposed venues are within that context - I think you'll also find a lot of the artists the reside in the city use those services for their children on a daily basis and are well aware of the discrimination faced on their professions. Also "city of Adelaide strategic desire to create a vibrant city that attracts and supports a growing population through the provision of entertainment and music venues, a thriving night-time economy" is laughable considering the council have aided and watched as more then several long term entertainment venues across the city - which is referenced in your map have closed in the last year and CoA has done absolutely nothing to support them, aided in any financial way nor provided clear or concise instructions when it comes to planning.

Should I also mention the "cranker" as well as the abysmal rates of occupancy along Hindley street, Pirie Street and other once bustling streets in the city that are now ghost towns?

For a City that spruks Fringe with all its glory i'm not sure its the best idea to push this through and further regulate the arts and entertainment sector whilst simultaneously boasting that you are here to support and create spaces for artists, it is very on the nose and quite frankly a gross misuse of your power as a council.

Should you need to contact me to discuss my details are as follows,
Email communication preferred:

Kind Regards,
Jaime Hamilton.

Lucy Hood MP
MEMBER FOR ADELAIDE

To whom it may concern,

I write to provide feedback from residents and businesses regarding the City of Adelaide's proposed Adult Entertainment and Adult Products and Services Code Amendment.

As you would be aware, the State Planning Commission through what was called a "Miscellaneous Technical Enhancement Code Amendment" last year proposed to add definitions for "adult products and services premises" and "adult entertainment premises" to the Planning and Design Code.

As a result of my advocacy, and that of East End residents, the Minister for Planning approved these changes.

Following this, I advocated to the City of Adelaide, again on behalf of residents in the East End, for the council to consider an Adult Entertainment Code Amendment for the East End.

I suggested this could be in the form of an "East End" subzone, which would designate adult entertainment premises as a "restricted" class of development in the East End.

The City of Adelaide's proposed Code Amendment went further than this, proposing a Code Amendment for the entirety of the City of Adelaide, including a specific zone for Hindley Street.

It is important to note that this was a decision of council and not a policy action local residents or I called for. Our focus has been entirely on the East End of the CBD.

East End Residents

In regard to local residents in the East End, they see the Code Amendment for their area as vital in protecting its unique character as a premiere retail and hospitality destination, and residential precinct.

In addition to these primary land uses, the east of the CBD is home to more than six places of worship, four educational institutions and two child-care centres.

In contrast it has only one existing Adult Entertainment Venue (Pole Position).

I have received feedback from the presiding officers of 16 Strata and Community Corporations in Adelaide's East End who represent 712 residential apartments or townhouses, housing a residential population of up to about 1400 people.



8269 1838 | adelaide@parliament.sa.gov.au
84 Prospect Road, Prospect SA 5082

LucyHoodAdelaide

They have made it clear they strongly oppose any Adult Entertainment and/or Adult Products and Services venues in or near the East End precinct and support the proposed Code Amendments, in respect to both Adult Entertainment Premises and Adult Products and Services Premises.

They have provided feedback that they would like to see an increase in the buffer distance from existing residential uses or land used for a place of worship, childcare centre, primary school or secondary school "from 50 metres to at least 100 metres, but preferably 200 metres".

Residents understand the Code Amendment will not impact the current practice of issuing Prescribed Entertainment Consent for the hosting of one-off activities that may be sexually explicit in nature, for example Burlesque shows during the Fringe Festival.

However, residents would ask that there is a robust compliance system in place to ensure venues using this consent to host, for example, a Buck's Party or Hen's Night, are doing so correctly, and that these activities do not become the primary use of the venue.

West End Businesses

I have also received feedback from hospitality and accommodation businesses in the West End, who have raised concerns regarding the Hindley Street zone within the proposed Code Amendment, which would effectively confine adult entertainment precincts to this precinct.

They say a specific zone for adult entertainment venues risks creating the impression of a "red light district" within the CBD. They believe this is at odds with the City of Adelaide's significant $15 million investment to upgrade Hindley Street. According to council, the investment is designed to improve the amenity and safety of the street, stimulate day-time activity, and encourage renewed business investment. The businesses' feedback also referenced the West End's strong links to tertiary and vocational education, and the significant hotel accommodation in the area, which in particular provides for conference and exhibition guests to our city. They say the Hindley Street upgrade is important in improving the vibrancy and safety of the area to attract more of these visitors to our CBD and the West End.

SIN – Adelaide (South Australian Sex Workers Peer Industry Network)

The Peer Industry Network representing Sex Workers in Adelaide has also contacted me to provide their feedback regarding the City of Adelaide's Code Amendment.

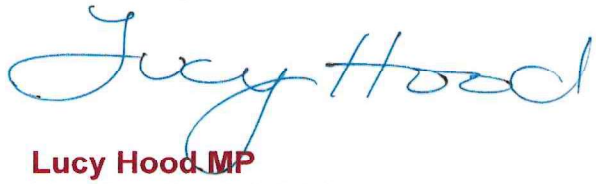
Whilst SIN will provide its own in-depth submission to Council, one of its concerns related to the Hindley Street zone creating a perceived "red light district" where *"workers who work in red light district are often pathologized, pitied, and seen as victims"*.

They also highlighted the direct opposition of the council's policies to invest $15m "to *re-invent Hindley Street as a family friendly area, while simultaneously branded the Hindley Street sub-zone as the only zone for adult entertainment".*

Thank you for considering the feedback I have received from the local community, CBD businesses and industry organisations as part of your consultation.

If you have any questions, or would like to discuss my submission further, please contact my office on 8269 1838 or adelaide@parliament.sa.gov.au.

Kindest regards,



Lucy Hood MP
Member for Adelaide

22 July 2024

From: Adult Bliss Admin <>
Sent: Friday, 19 July 2024 1:18 PM
To: PDCSA Amendments
Cc: Premier@sa.gov.au; Lord Mayor; Minister.Cregan@sa.gov.au; bragg@parliament.sa.gov.au; adelaide@parliament.sa.gov.au
Subject: Submission in Opposition to Proposed Adult Entertainment Premises Code Amendment

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To Whom It May Concern,

I am writing to express my strong opposition to the proposed amendments to the Planning and Design Code concerning adult entertainment premises and adult products and services premises within the City of Adelaide.

Impact on Local Businesses and Employment

Adult entertainment businesses play a crucial role in the local economy, providing jobs and contributing to the vibrancy and diversity of the community. Implementing restrictive planning policies could lead to the closure of many businesses, resulting in significant job losses and economic downturn for the industry. Many employees rely on these establishments for their livelihood, and restrictive measures would unfairly target a sector that is already heavily regulated during a cost of living crisis. Unfairly impacting lowing income residents.

Support for Inclusivity and Diversity

The adult industry is known for its commitment to inclusivity, diversity, and providing safe spaces for individuals of all sexual orientations and gender identities. By imposing restrictive zoning laws, the City risks marginalizing an already stigmatized industry and its patrons. It is essential to promote an inclusive environment that respects the rights and choices of all community members.

Contribution to Public Safety

Contrary to common misconceptions, well-regulated adult entertainment venues contribute to public safety by providing controlled environments for adult activities. These establishments operate under strict guidelines and are regularly monitored to ensure compliance with laws and regulations. Displacing these businesses to less visible or accessible areas could inadvertently increase unregulated activities, posing greater risks to public safety.

Cultural and Social Value

The adult entertainment industry offers more than just economic benefits; it provides cultural and social value. These venues often host events and activities that foster a sense of community and

provide entertainment options for adults. They contribute to the diverse cultural fabric of Adelaide, making it a more vibrant and appealing city for residents and visitors alike.

Growth, Education, and Mental Health

The adult retail industry is a growing sector that emphasizes education, inclusivity, and the positive impact on clients' sexual and mental health. These businesses focus on providing safe, consensual, and educational environments that help individuals explore and enhance their sexual well-being. The industry operates free from criminal elements and prioritizes the health and safety of its clients, offering products and services that support mental health and foster healthy relationships.

Recommendations

Instead of implementing restrictive planning policies, I recommend the following:

1. Engage with Industry Stakeholders: Establish a dialogue with industry representatives to better understand the unique needs and challenges faced by adult entertainment businesses.

2. Enhance Current Regulations: Focus on enhancing existing regulations to ensure compliance and safety without imposing undue restrictions on the location and operation of these businesses.

3. Promote Education and Awareness: Increase public awareness about the positive contributions of the adult entertainment industry to counteract stigmas and misconceptions.

In conclusion, I urge the City of Adelaide to reconsider the proposed amendments and work collaboratively with the adult entertainment industry to develop balanced policies that support economic growth, inclusivity, and public safety.

Thank you for considering my submission.
In reference to https://www.cityofadelaide.com.au/community/get-involved/adult-entertainment-premises-code-amendment/

On a personal note I find it sincerely disappointing and upsetting that my industry, an industry that provides so much culture, education, pleasure, and so many quality services to South Australia residents is once again being discriminated against. This legislation will drastically negatively impact our industry and not improve the life of anyone else.

Let's call a spade a spade, this is an unconstitutional witch hunt and goes against anti discrimination practice's. Don't you have better things to do?

Sincerely,
Monique T Turmine and Simon J Mawson
Co owners at Adult Bliss Erotica

Your reference: 2023/00540

Ms Colleen McDonnell
Manager, City Planning and Heritage
GPO Box 2252
ADELAIDE SA 5001
PDCSA.amendments@cityofadelaide.com.au

Dear Ms McDonnell

SAPOL wish to make no comment in relation to the Adelaide City Council Adult Entertainment and Adult Products and Services Code Amendment Public Consultation Document received on 14 June 2024.

If you or anyone at Adelaide City Council wish to discuss this further please contact Chief Inspector Brett Humphrey, Officer in Charge Licensing Enforcement Branch on

Yours sincerely

Assistant Commissioner Narelle Kameniar
OPERATIONS SUPPORT SERVICE

1 July 2024

SASH
South Australia Stripper Hub

9 August 2024

Dear Colleen McDonnell, Members of Adelaide City Council, and other Stakeholders,

Regarding the Adult Entertainment and Adult Products and Services Premises Code Amendment

We are writing to express our opinion on the Adult Entertainment and Adult Products and Services Premises Code Amendment proposed in the City Council of Adelaide.

South Australia Stripper Hub (SASH)[1] maintains that sex work is valid employment and provides valid services in all its forms. Further, SASH welcomes policies and reform which supports greater safety, well-being, and autonomy for workers, including that which seeks to actively counter stigmatisation and marginalisation which harms workers in the sex industry (the Industry). Since mid-2023, SASH has been working with the Attorney General's Department to promote safer workplace health and safety (WHS) practices in Live Adult Entertainment venues.

It is our belief that the proposed Premises Code Amendment (the Code Amendment) would undermine efforts SafeWork SA has undertaken with SASH to improve WHS practices in South Australia's Live Adult Entertainment venues.

We have outlined below our concerns and recommendations pertaining to the Code Amendment.

Firstly, workers in the Industry continuously persevere in face of numerous physical and psychosocial risks in their workplaces. SASH's working with SafeWork SA reinforces that current WHS practices in Live Adult Entertainment venues do not meet acceptable standards, which will be further exacerbated by the Code Amendment.

The Live Adult Entertainment landscape at present is dominated by a duopoly operating three of the four venues in Adelaide's CBD. SASH would like to note that confining Adult Entertainment premises to the Hindley Street Subzone would further entrench the hold the duopoly has over the industry; consolidating their free rein to dictate industry norms which significantly impact workers and clientele.

[1] SASH is a peer-led industry resource hub that assists strippers in South Australia exercise their rights and access their workplace entitlements (www.southaustraliastripperhub.com).



Figure 1: *The limited options remaining after implementing 50m zoning, with applications to use these remaining spaces for Adult Entertainment still subject to meet additional criteria*[2].

In significantly limiting suitable land for Adult Entertainment premises (see Figure 1), the Code Amendment would restrict and impede opportunity for new venues (including sex-worker lead businesses) to gain a foothold in Adelaide's Live Adult Entertainment landscape. The critical consequences of this are two-fold; firstly, in preventing and minimizing competition between venues to offer workers a higher standard of working conditions. Crucially, workers have greater power to negotiate terms and conditions of their engagement when they have options for where they can work. Further, in reinforcing the standing of the duopoly, the Code Amendment would disincentivise voluntary compliance with WHS obligations by current venue owners and management. The amendment would thus exacerbate already disproportionate power disparities between venue owners/management and the workers; while undermining efforts by SafeWork SA and SASH to encourage proactive WHS practices and shift Industry norms.

We also wish to note our concern regarding broader social and economic consequences of the Code Amendment. Where the City of Adelaide Strategic Plan (2024 – 2028)[3] espouses values of inclusivity, equality, and safety, the Code Amendment indicates these ideals do not extend to sex workers in the community. SASH is concerned the Code Amendment would in practice further restrict and 'other' sex workers and reinforce stigmatising rhetoric which propagates harm against them. The Code Amendment also reflects multiple methods by which local and state Governments have historically been unsupportive of sex workers[4].

Finally, to contextualise economic repercussions for workers it must noted many sex workers in South Australia are small business owners, and that workers and patrons often travel interstate to attend

[2] City of Adelaide Council (2024), *Adult Entertainment Code Amendment*, https://experience.arcgis.com/experience/9bd3218997fe4361b10662c5c4f2ca99
[3] City of Adelaide Council (2024), *Strategic Plan 2024* – 2028, https://www.cityofadelaide.com.au/about-council/plans-reporting/strategic-planning/
[4] Scarlet Alliance & Australian Federation of AIDS Organisations (2019), *Unjust and Counter-Productive: The Failure of Governments to Protect Sex Workers from Discrimination*, p 6-7

Live Adult Entertainment venues. Impacts to the safety and agency of sex workers yields physical, psychosocial and economic consequences, all of which restricts their engagement with South Australia's economy. For example, when WHS obligations are not met and workers are at greater risk of physical or psychosocial risk, sex workers require greater (unpaid) time away from work, and their productivity when on shift is significantly impeded. These impacts are also further reaching, to include the appeal of Adelaide's venues for interstate sex workers, and are reflected in client experiences and investment.

SASH recommends discarding the Code Amendment. Alternately, we recommend you request the following revisions:

Recommendation 1: Focusing on visibility of Adult Entertainment services and venues rather than land use.

Where the presence of Adult Entertainment and Product and Services premises is sought to be contained by the Code Amendment, there are alternatives to restricting land use. Adult Entertainment venues can exercise discretion, for example if advertising during daytime hours (e.g., 7am to 5pm) was to limit or exclude adult themes, or by limiting their venue advertising to include only the businesses' hours. Another option includes Adult Entertainment businesses refraining from advertising during the daytime (where the business itself is not open during daytime hours), or during opening hours of nearby premises (such as schools, childcare centres). Please note that where restrictive advertising is still discriminatory in effect towards sex workers[5], it presents a safer alternative to the proposed limitations on land use.

Recommendation 2: Revising proposed 'zoning' for Adult Entertainment Services and Venues.

If The City Council of Adelaide proceeds in implementing the Code Amendment, SASH asks "areas where the land use is allowed" be added beyond solely the Hindley Street Subzone. This extension would allow more opportunity for prospective venues and greater agency for workers in line with our concerns. While Hindley Street presently acts as a 'hub' of Adelaide's nightlife, it is not necessarily the most nor only suitable Subzone for Adult Entertainment, nor Products and Services venues.

We recommend extending beyond just the Hindley Street Subzone, this could include Currie, Waymouth, Franklin, Rundle, Pirie and Flinders Streets, in addition to sections of King William Road. Pertaining to the East End of the CBD, it is worth noting the ongoing success of Fringe shows produced by and featuring the talents of sex workers[6]. Where adult entertainment has been recognised and awarded during Fringe season, there is some hypocrisy in classifying this Subzone as "unsuitable" during all other times of the year.

[5] Scarlet Alliance & Australian Federation of AIDS Organisations (2019), p 6

[6] Including Weekly Best Dance Award 2023 'Red District' (https://glamadelaide.com.au/award-winning-red-district-returns-to-fringe-in-a-sensual-spectacle-of-dance-and-aerial-acrobatics/) and BANKSA Best Dance Award 2021 'HÜMAN' (https://adelaidefringe.com.au/awards-archive).

Recommendation 3: Revision of given definitions

Finally, SASH recommends removing the disclaimer in the definition given for Adult Entertainment and Adult Products and Services premises that such spaces "does not include premises used for prostitution." Not only does this language not reflect that used within the Industry, but this could also present issues in future should the sex industry finally be fully decriminalised in South Australia.

SASH welcomes policies and reform which promote greater safety, well-being, and autonomy for sex workers in South Australia. We feel the best outcomes for workers will extend from industry regulation rather than restrictions.

We want to thank you for your attention on this issue and the space for SASH to share our thoughts and recommendations. If you would like to contact us to discuss this further, you can do so via our email below.

In solidarity,

SASH
South Australia Stripper Hub

Website: www.southaustraliastripperhub.com.au

Australian Sex Workers Association

Phone – 02 9517 2577
Fax – 02 9517 2488
Post – PO Box 854
Newtown NSW 2042
Street – Suite 203, 1 Erskineville Road
Newtown NSW 2042
Email – info@scarletalliance.org.au
Web – www.scarletalliance.org.au
ABN - 86 612 112 065

23 July 2024

pdcsa.amendments@cityofadelaide.com.au

To: Colleen McDonnell, Manager City Planning and Heritage, City of Adelaide

Re: Planning Code Amendment, Adult Entertainment

Thank you for the opportunity to submit to the engagement process of the Planning Code proposed Amendment on Adult Entertainment.

Scarlet Alliance, Australian Sex Workers Association, is the national peak sex worker organisation.
Formed in 1989, our membership includes state and territory-based and national sex worker organisations and individual sex workers across unceded Australia.

Scarlet Alliance uses a multifaceted approach to strive for equality, justice and the highest level of health for past and present workers in the sex industry. We achieve our goals and objectives by using best practices including peer education, community development, community engagement and advocacy.

Scarlet Alliance is a leader when it comes to advocating for the health, safety and welfare of workers in Australia's sex industry. Through our work and that of our member organisations and projects, we have the highest level of contact with sex workers and access to sex industry workplaces throughout Australia. Scarlet Alliance represents sex workers on a number of government and non-government committees and advisory mechanisms.

Scarlet Alliance opposes the planning code amendment and looks forward to engaging productively with this process.



Mish Pony
Chief Executive Officer

Executive summary **2**
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Policies to best guide City of Adelaide assessment of Adult Entertainment, Adult Products and Adult Services Premises. **3**
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The Chilling Effect of Zoning 4
Potential for Council corruption 4
Do you support the draft amendment? **5**
The spirit of engagement has not been adhered to 5
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The proposed should be rejected because it favours the gig economy 7

Executive summary

Adult entertainment venues are sex worker workplaces. While South Australia does have the capacity for state-wide standardisation of planning codes and rules, in this instance the Adelaide City Council proposal is specific to their own zones and subzones.

By seeking planning code amendments to confine purpose built stripper workplaces to the tiny duopoly already in existence and exclude other venues from renovation or permanency, Council is taking a political stance against new strip clubs. [1] [2] [3]

By seeking planning code amendments to treat permanently-located fixed-site adult entertainment venues differently to other permanent-located fixed-site entertainment venues, over the attribute of explicit sex work taking place (in the form of stripping), Council is discriminating against people undertaking sex work. [4] [5] [6]

[1] Tarla Lambert. 2023. "Sussan Ley misses fundamental point in calling for strip club ban." *Women's Agenda*. 15 November 2023.

[2] Harry Sekulich. 2023. "Senior Liberal woman wants to stop new strip clubs from opening." *The Daily Aus*. 15 November 2023.

[3] The Project. 2023. "Calls for Ban on New Strip Clubs across Australia." *The Project*. 12 November 2023.

[4] Scarlet Alliance. 1999. *Unjust and Counter Productive; The Failure of Governments to Protect Sex Workers from Discrimination*.

[5] Hunt & Hunt Lawyers. 2022. *Sex Work Decriminalisation Bill 2021: Whythe legislative reform?*

[6] Victorian Equal Opportunity and Human Rights Commission. 2024. *Profession, trade or occupation*.

What is your interest in the draft amendment?

Scarlet Alliance members include SIN in South Australia, as well as individual sex workers, many who work in Adult Entertainment venues. We note the Engagement Plan listed our organisation as a stakeholder with 'medium' level interest in this amendment. This submission outlines why the issue is of high level importance to our organisation, our members, and the work health and safety of all those working and visiting adult entertainment venues in Adelaide city.

Policies to best guide City of Adelaide assessment of Adult Entertainment, Adult Products and Adult Services Premises.

The Engagement Plan describes City of Adelaide's proposal as 'robust' policies to guide land use. The proposal would:

- ***Prevent*** assessment of adult entertainment, products and services premises development applications outside Hindley Street Subzone.
- ***Entrench*** the adult entertainment industry duopoly in the Hindley Street Subzone for the foreseeable future.
- ***Stigmatise*** workers in adult entertainment venues.

In addition, the City of Adelaide would be able to limit any new purpose-built adult entertainment, products or services premises from being assessed outside the proscribed area and those locations would not be protected with the usual SCAP accountability measures, appeals processes or transparency.

Negative Impacts on WHS

The Code Amendment would create numerous negative impacts on work health and safety in Adult Entertainment Premises, and the safety of visitors to the same. Work Health and Safety approaches are now the primary means of regulating sex work in the decriminalised states and territories; NSW, Victoria, Northern Territory and Queensland. The following observations are relevant:

- Permanently-located workplaces at fixed-sites are able to implement structural improvements in response to WHS risks
- Workplaces with ongoing viability and security of location are more likely to be able to invest in structural improvements in response to WHS risks
- Workplaces that are temporary, fear closure, are operating without planning approval or excluded from applying for approval are less likely to invest in renovations to address safety
- When the industry is dominated by one or two operators, without alternative workplaces for workers to adopt, WHS standards are at risk of dropping
- Monopoly or duopoly ownership reduces workers ability to report WHS breaches or hazards

The Chilling Effect of Zoning

The City of Adelaide proposal excludes all workplaces outside of Hindley street from applying for approval. Such anti-sex work zoning has a chilling effect on other, similar venues and workplaces, promoting non-compliance across the board and suggesting the local government is a foe, not a friend. The knock-on effect into other local government jurisdictions is unavoidable, and the available methods of checking compliance are all unethical. While the literature refers mainly to private sex work, massage shops and brothels, the problems with enforcement of the Planning Code Amendment as proposed by City of Adelaide should be seriously considered. Does City of Adelaide propose hiring private investigators to pretend to be customers, surreptitiously film or trick strippers into providing a service (as Victoria[7] and NSW[8] local councils have done with contact sex work)?

Potential for Council corruption

Anti-sex work zoning policy creats a platform for corruption of Council planning processes. While the literature focuses almost solely on contact sex work, the lessons can be applied to the Planning Code Amendment. Evidence shows when Councils are permitted to act in deliberate bad faith against sex work premises, they will.

- New South Wales sex industry businesses applications, even when compliant with planning codes, have been refused by Councils for illogical moralistic reasons.[9]
- Queensland local authorities behaved in 'needlessly obstructionist' ways toward brothel applications for decades without fear of repercussion. [10]
- A Gold Coast City Councillor raised potentially fraudulent complaints against the location of the sex worker organisation and avoided censure because she had the numbers.[11]
- A Fairfield brothel in-situ for almost a decade then treated by the Council as undesirable, planning code applied disingenuously for forced relocation.[12]
- New South Wales local councils arguing predictive estimates of amenity impact in the Land and Environment Court rather than fairly evaluating actual impacts of sex industry premises.[13]

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[7] 2007. 'Some Vic councils paying for brothel sex.' *Sydney Morning Herald*. 25 Jan 2007. https://www.smh.com.au/national/some-vic-councils-paying-for-brothel-sex-20070125-gdpbol.html

[8] Eamonn Duff. 2014. ' Councils hire sex spies to catch parlours in the act.' *Sydney Morning Herald*. 21 September 2014.

[9] Crofts, P. (2006) Visual contamination: Disgust and the regulation of brothels. Available at SSRN: https://ssrn.com/abstract=2826908 or http://dx.doi.org/10.2139/ssrn.2826908

[10] Easton, R. & Fear, J. (2001). Queensland Parliamentary Library Research brief: 2001/29 The Prostitution Amendment Bill 2001 (Qld), p. 23. https://documents.parliament.qld.gov.au/explore/ResearchPublications/ResearchBriefs/2001/2001029.pdf

[11] Gold Coast City Council. (2020). Council Meeting Minutes. 18 February 2020. Pgs 75-97.

[12] SWOP NSW, ACON. (2002). Unfinished business, achieving effective regulation of the NSW sex industry.

[13] Crofts, P. && Prior, J. (2012). 'Intersections of planning and morality in the regulation and regard of brothels in New South Wales', *Flinders Law Journal*, vol 14, pp. 329-357.

Anti-sex work policies at a local council level result in planning staff expertise being overlooked when reasonable development proposals for sex industry premises are submitted for approval.[14] Instead of being treated fairly like any other business, anti-sex work policies create blatant discrimination, high-profile stigmatisation and allow corruption of planning processes.

For example:

- Queensland Chief Magistrate Tim Carmody challenges expansion of Halo Lounge Bar and Honey B's strip club near his Petrie Terrace home (2013)
- The impending arrival of another strip club at the heart of Brisbane's Caxton Street precinct has ruffled high-profile feathers, from Queensland's Treasurer down (2010)
- A campaign started by opposition to Toowoomba's CBD strip club has ended with local councils getting the power to stop adult entertainment venues (2014)

Do you support the draft amendment?

Scarlet Alliance does not support the draft amendment.

The spirit of engagement has not been adhered to

Scarlet Alliance asserts the engagement activity for the code amendment on Adult Entertainment has not been promoted with the same or comparable dedication as the other Hindley Street consultation running concurrently.

The other Hindley Street consultation was promoted on the City of Adelaide 'X' account, the code amendment was not:



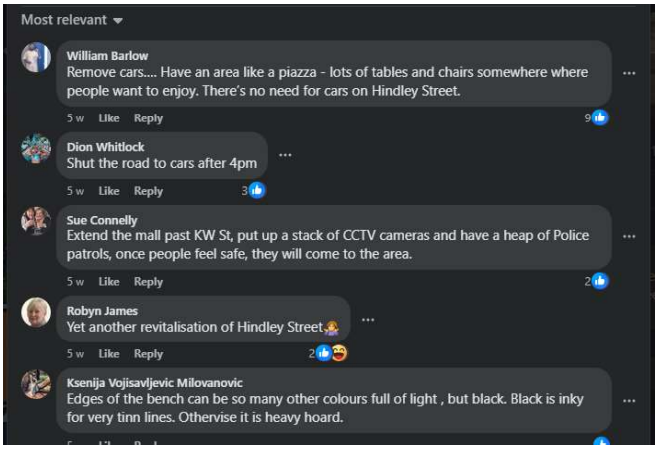
[14] Papadopoulos, C. & Steinmetz, C. (2011). 'Why is sex so complex? An examination of commercial sex premises in the New South Wales planning system'. Paper presented at the *World Planning Schools Congress*, Perth, 4-7 July 2011. https://apo.org.au/sites/default/files/resource-files/2011-12/apo-nid60050.pdf

The other Hindley Street consultation was promoted on the City of Adelaide 'FaceBook' account, the code amendment was not:









Scarlet Alliance obtained a face to face meeting by request, thank you. Overall however Scarlet Alliance observes that the level of promotion of consultation on this code amendment does not match the spirit of engagement described in South Australia planning engagement policy documentation.

The proposal should be rejected because it concentrates ownership

This code amendment will amplify existing concentration of ownership of adult entertainment venues in South Australia, and should be rejected on that basis alone. A lack of options of working locations contributes to working conditions becoming stagnant or moving backwards. This is not good for our members who work at those venues and, we propose, it is not good for those venues because it results in complacency in WHS. While not suggesting there is any corruption in those venues currently, Scarlet Alliance would like to put it on the record that concentrated ownership in *any* industry risks promoting corruption.

The proposed should be rejected because it favours the gig economy

The proposal will create disincentives against new purpose built venues being developed in Adelaide city. Scarlet Alliance rejects the proposal because a planning system that favours the gig economy over more stable work in adult entertainment would create negative outcomes for our members. Adult entertainment workers should have a range of options to choose from for work; and at minimum should have the choice of more than two permanent venues in the whole of Adelaide. The code amendment, if successful, relegates adult entertainment workers to the gig economy *except for two venues*. Being pushed into the gig economy ***due to a code amendment*** and experiencing workplace health and safety risks and reduced human rights as a result, would be a wholly unacceptable outcome for our members.

(08)
Mile End, South Australia
5031 Email -
info@sin.org.au

Manager City Planning and Heritage
City of Adelaide.
Code Amendment Consultation
GPO Box 2252
Adelaide SA 5001
Email - PDCSA.amendments@cityofadelaide.com.au

22/07/2024

To Colleen McDonnell

Re: SIN submission to the Adelaide City Council - Adult Entertainment and Adult Products and Services Code Amendment

Thank you for the opportunity to provide a submission addressing the proposed changes to the Adult entertainment and adult product and services code.

This submission does not support the proposed amendments to the adult entertainment and adult product services code.

SIN is a peer-based organisation funded to promote the health, rights, and wellbeing of sex workers in South Australia. We are funded within the Sexually Transmissible Infection (STI) and Blood Borne Virus (BBV) sector to provide best practice service delivery within a harm reduction framework. Funded by SA Health since 1986 as an arm of the now defunct AIDS Council of SA, SIN became an independent and incorporated entity in 2017. SINs ethos is to be informed, always, by the needs of the sex work community. We value strong community ownership of our programs and seek to build capacity and power within our cohort. Sex work is real work, and all legislative frameworks must always align with this principle.

Q1. What is your interest in the draft Code Amendment?

SIN was contacted by the City of Adelaide for feedback as an identified priority population. As the only 100% sex worker peer led organisation in South Australia, SIN is best placed to provide commentary and feedback regarding the proposed amendments. SIN is interested in anything that interests sex workers, and these amendments will impact the industrial, personal, and professional interests of sex workers. Sex workers are diverse, and work in varied settings. The sex worker rights movement identifies erotic dancing, stripping, peep show work, and lap dancing as sex work.Sex work is real work, and legislative frameworks must always align with this principle.

SIN is committed to advocating for the rights of sex workers and we are deeply invested in policy that speaks to empowerment and agency for sex workers; policy that recognises the industrial and human rights of sex workers from all sectors of our industry.

Q2. Do you support the draft Code Amendment?

SIN strongly opposes the proposed changes to the Planning and Design Code.

Stigma and Discrimination

We believe the proposed Adult Entertainment Premises Code Amendments are discriminatory and fed by an alarmist and prejudiced narrative embraced by a tiny number of Adelaide City residents. We know that the restrictive nature of these amendments will negatively impact our community's industrial rights, safeguards, health, and wellbeing[1]. We view these amendments as a political move which panders to a vocal minority pushing their morals on others. It is this type of uninformed feedback, coupled with nimbyism, which promotes stigma, discrimination, and prejudice by framing adult entertainment (and those that work within the industry) as "other"[2].

Sex workers from all sectors of the industry experience deep seated and casual discrimination and prejudice. Policy makers must take the lead on eradicating systemic and social discrimination and prejudice by embracing inclusive legislation. If these amendments pass, the Adelaide City Council will send a clear message to constituents and other business owners that sex workers and sex industry establishments sit outside of social "norms", thereby perpetuating discrimination, stigma, and prejudice.

Buffer Zones

The Adelaide City Council has provided an interactive map for the purposes of investigating the impact of proposed "buffer zones" for Adult Industry premises use or development. *When using the interactive map provided by the Adelaide City Council it becomes apparent that these amendments are nothing more than a thinly veiled ban on adult entertainment establishments.* The buffer zone proposal, i.e adult entertainment premises needing to be 50 metres from prescribed premises, all but abolishes the creation of new adult entertainment venues. There is, quite literally, nowhere that a purpose-built adult entertainment premises may be approved except for the Hindley Street sub-zone. This is targeted and discriminatory towards sex workers as the amendments restrict our workplaces and suggest our industry requires separate and bespoke planning laws. We support adult entertainment premises being given the same considerations as licenced restaurants or bars. The implication that proximity to a sex industry business is 'undesirable' or 'dirty' is a regressive notion and perpetuates stigma and discrimination which impacts the sex industry on a daily basis[3].

Red Light District and CPTED

The proposed amendments to the planning code seek to push adult entertainment premises/industries (and those that work within the industry) into constrained, restrictive spaces, severely impacting the safety, rights, and agency of workers. With the only viable location available to anyone wanting to open a purpose-built adult entertainment premises being the Hindley Street sub-zone, this has the potential to create a Red-Light district. The creation of a red-light district perpetuates stigma and discrimination, as workers within red light districts are often pathologized, pitied, and seen as victims. There is also a failure to consider the safety of workers if a red-light district is created, with one example of negative fallout due to the creation of a red-light district being workers may not be able to arrange transport to and from work (Ubers, taxi's) due to stigma, discrimination, and fear.

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[1] Scarlet Alliance. 1999. *Unjust and Counter Productive; The Failure of Governments to Protect Sex Workers from Discrimination*.
[2] Hunt & Hunt Lawyers. 2022. *Sex Work Decriminalisation Bill 2021: Whythe legislative reform?*
[3] Crofts, P. (2006) Visual contamination: Disgust and the regulation of brothels. Available at SSRN: https://ssrn.com/abstract=2826908 or http://dx.doi.org/10.2139/ssrn.2826908

We believe that the creation of a red-light district through the proposed amendments do not align with Crime Prevention Through Environmental Design (CPTED) principles as set out by both Adelaide City Council and SA Police (SAPOL). It is important to note that the CPTED encourages legitimate activities, *and adult entertainment is a legitimate activity under the law.,* Adult industry workers must be treated with dignity and respect, and we ask the Adelaide City Council to recognise the industrial and human rights of sex workers Workplace health and safety in adult venues is not less worthy than any other workplace.

Duopoly

There are currently three (3) strip clubs within the Hindley Street sub-zone. Of these three (3) premises, there are two (2) owners. The proposed restrictions upon purpose-built adult entertainment premises and segregation to the Hindley Street sub-zone further plays into this adult entertainment duopoly. Intel gathered from adult entertainment workers demonstrates that owners of current Hindley Street establishments will (and have) actively lobby against the opening of any new premises. Only having two workplace options (regarding ownership) to choose from is problematic economically, but more importantly it removes agency from workers. The proposed amendments will allow this duopoly to remain without challenge, creating space for collusion and corruption. Moreover, the restriction upon purpose-built venues, in combination with the specific exclusion of premises where sexually explicit entertainment is undertaken temporarily within the proposed amendments, directly forces workers into a gig economy. Not only do purpose-built premises bolster workplace health and safety, but it gives us greater freedom of choice as workers[4].

Family Friendly Investment

The proposed amendments, specifically the flagging of the Hindley Street sub-zone as the only viable area for adult industry establishment use or development, are in direct contrast to the Hindley Street Main Street Project. In 2023 the Adelaide City Council announced a 15-million-dollar investment into re-inventing Hindley Street as a family friendly area[5]. This family friendly investment in Hindley Street, while simultaneously restricting all adult entertainment into the Hindley Street sub-zone, is a contradiction, and an absurd waste of taxpayer funds. The idea that Adult Industry establishments are solely night-time activities is a misguided myth. Does the Adelaide City Council feel confident that an evening red-light district (as will be created by the proposed changes to the planning code) will easily pivot to a family friendly space during the day? The investment plan and the proposed amendments are incongruous at best, and strategically designed at worst. We have serious concerns that the million-dollar investment will further cement the existing duopoly paradigm.

Q3. Do you have any suggested changes to the draft Code Amendment?

We recommend the Adelaide City Council discard the proposed amendments.

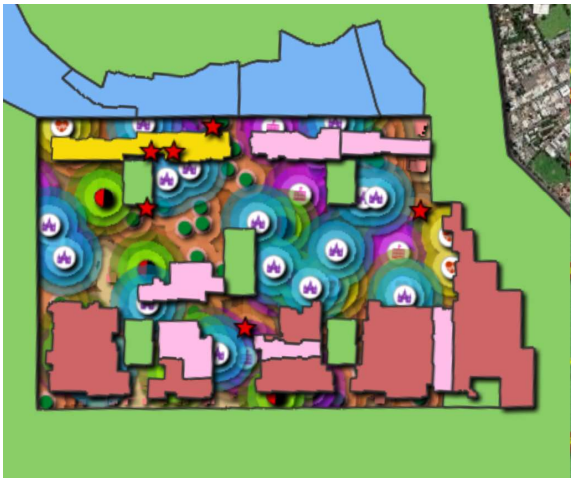
We also recommend removal of terminology “premises used for prostitution” from the planning code as while full service sex work is currently criminalised it will present future planning code issues when South Australia inevitably updates sex industry laws.

If discarding the amendments is not feasible, SIN suggests removing the proposed buffer zones and/or the language used in the explanation and delineation of the buffer zones. We suggest amending the wording to

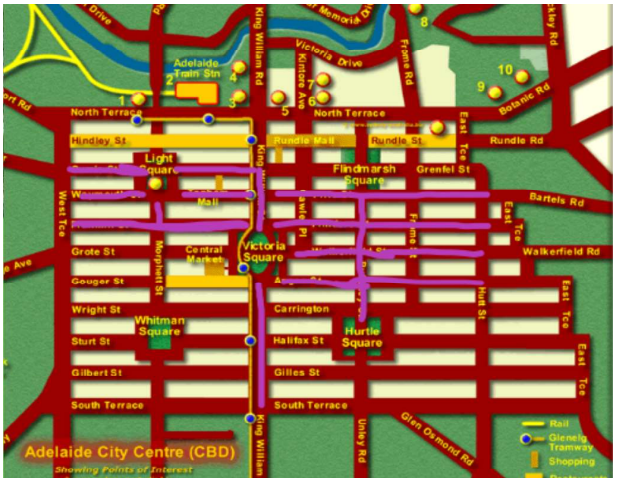
[4] Tarla Lambert. 2023. “Sussan Ley misses fundamental point in calling for strip club ban.” *Women’s Agenda*. 15 November 2023.
[5] City of Adelaide, 2023, Hindley Street Revitalisation, available at: www.cityofadelaide.com.au/development-infrastructure/infrastructure/infrastructure-projects/hindley-street-revitalisation/

indicate certain restrictions apply during the “business hours” of prescribed premises, for example, adult entertainment premises must restrict all external advertising during the “business/opening hours” of prescribed premises (schools, child care centres, places of worship) *or* adult entertainment premises must restrict all external advertising during 8am and 6pm, for example.

Again, if discarding the amendments is not feasible, we would also like to suggest a revision to and extension of the allocated sub-zone. Certain streets in the city centre, predominantly the business district, should be included in the allocated provisions for land use and design for adult entertainment venues. Currie, Waymouth, and Franklin Streets are not residential and may be flagged for use. Certain sections of King William Street, Pirie, and Flinders Streets may also be appropriate.



Current proposed Buffer Zones
Interactive map supplied by Adelaide City Council
Adult Entertainment Code Amendment (arcgis.com)



Suggested additional zones for Adult Entertainment Premises use (in purple)

If you would like to to discuss this further please contact:

Kat Morrison - SIN GM

SUBMISSION

THE NORTH ADELAIDE SOCIETY Inc.

23.07.2024
By email only

TO: Corporation of the City of Adelaide
PDCSA.amendments@cityofadelaide.com.au

Attn: Julia Thomson
Code Amendments Consultation

Re: **draft Adult Entertainment Premises Code Amendment**

The draft code amendment in respect of:

1. "Adult Entertainment Premises"; and
2. "Adult Products and Services",

are conditionally supported, subject to the comments herein.

COMMENTS

1. Each proposed "Adult" land use is directed to an "adult" age-based cohort and purpose, and ought not be permitted, or capable of being permitted, to be at a location, or in a precinct, zone or area that is not for that purpose (i.e., an "adult" only age-based land use).

2. City Living (i.e. residential) zones and sub-zones, and their adjacent "main street" or neighbourhood centre (howsoever described), and the Adelaide Park Lands, contemplate and promote use of land by non-adults (i.e., children), who ought not be subjected to a land use that is wholly for an "adult" age-based cohort and purpose.

2.1 Neither "adult" land use (premises / services) ought to be permitted within:

a) Adelaide Park Lands
b) City Living
c) City Main Street (incl. Melb. Street West)
d) Community Facilities
e) That part of the Capital City that is contiguous with, or immediately adjacent to, the above zone/s or localities
f) City Riverbank and other zone within the care and control of a government entity.

3. Each of the proposed "adult" land uses ought **not** at any time or in any respect:

3.1 be in a location or zone that may result in direct, indirect, transient or accidental visual or physical interaction with pre-school and school age children, and non-adults;

3.2 be within a 100 metre buffer zone of a land use incompatible with an "adult" only land use (e.g., Park Land; place of worship, childcare centre, school, residential, main street).

4. Subject to the buffer zone indicated herein, it is acknowledged that currently the Hindley Street zone is primarily known as an 'adult' based land use, albeit not confined to an "adult" only age-based cohort and purpose. Presumably, appropriate planning conditions will be imposed.

5. To provide certainty of effect and intent, the language and expressions used in the draft code amendment ought to be clear and unambiguous (e.g., not use "in general" or "generally").

J

From: PlanSA Submissions <noreply@plan.sa.gov.au>
Sent: Thursday, 20 June 2024 4:14 PM
To: PDCSA Amendments
Subject: Public Consultation submission for Adult Entertainment Premises Code Amendment

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Colleen McDonnell, Manager City Planning and Heritage, City of Adelaide,

Submission Details

Amendment:	Adult Entertainment Premises Code Amendment
Customer type:	Member of the public
Given name:	Andrew
Family name:	Watson
Organisation:	
Email address:	
Phone number:	
My overall view is:	I support the Code Amendment
Comments:	I that it is very important in terms of both management of risk and maintaining social amenity to restrict the area for adult entertainment venues. By restricting such developments to the Hindley Street area, it makes supervision of compliance and oversight of risk much easier. It also means that the amenity of other city areas and the peaceful environment of residential areas can be enhanced.
Attachment 1:	No file uploaded
Attachment 2:	No file uploaded
Attachment 3:	No file uploaded
Attachment 4:	No file uploaded
Attachment 5:	No file uploaded
Sent to proponent email:	PDCSA.amendments@cityofadelaide.com.au

The Right Honourable The Lord Mayor of Adelaide
Dr Jane Lomax-Smith AM
City of Adelaide
GPO Box 2252

Dear Lord Mayor, City Councillors and Stakeholders

Re: The Draft Adult Entertainment Premises Code Amendment released for public consultation from **11 June to 23 July 2024**

On behalf of the Adelaide West End Association, I am writing to express concerns regarding the Adult Entertainment Premises Code amendments proposal to implement a buffer zone in the city, which notably excludes Hindley Street.

We understand and fully support the Council's efforts to enhance the urban environment and ensure safety and liveability for all residents and visitors. However, we are perplexed and concerned by the decision to omit Hindley Street from this buffer zone, especially given the significant presence of vulnerable and important tourism and community institutions within and around this area.

This distinction from the rest of the city is in effect a sanctioning of a redlight district in Adelaide's West End.

This reinforces the negative perceptions that have long held back to development of this part of the city and as we stand on the precipice of an important evolution for Hindley Street, it is imperative that any amendments to urban planning policies take into consideration the future aspirations and needs of this community.

Maintaining this perception has led to the current dire circumstances of the street with the highest vacancy rate of any city main street. Given its adjacency to Rundle Mall this is clearly an unacceptable situation.

Hindley Street and its immediate surroundings are home to numerous educational institutions and schools, including those servicing students under 18. Additionally, the street abuts various student accommodation buildings, many of whom are young residents and international students. The area also boasts the largest concentration of international hotels, they are also a key provider of accommodation services to major conventions at the Adelaide Convention Centre.

The Condition and tenancy mix of Hindley Street effects the local, national and international reputation of the city as a whole.

Hindley Street is not just for 18-25 year olds visiting the area at night for 6 hours/week. It is also frequented by families visiting Adelaide, and major arts institutions that regularly hold underage programming, including nighttime events at venues like the Hindley Street Music Hall.

adelaide west end association
PO BOX 10502
Adelaide, BC
SA 5000
m: +61 0419 852 518
e: coordinator@adelaidewestend.com.au
w: www.adelaidewestend.com.au

Furthermore, the potential adverse effects on land values have been expressed to us by concerned landlords. The exclusion of Hindley Street from the buffer zone could lead to a decline in property values and deter future investments, undermining the long-term growth and development plans for the area.

These realities raise substantial concerns about the rationale behind the exclusion of Hindley Street from the proposed buffer zone. Not only does this decision overlook the diverse demographic that frequents the area, but it also poses a risk to the significant investments being made into the redevelopment of Hindley Street.

We need to change the narrative if the future vision and potential for the West End is to be achieved. It is crucial to understand that the West End is not merely a nighttime adult economy and it never in truth has been, it is at its best a genuine mixed-use community at its worst a street of empty shops; it is a vibrant and diverse community that deserves equitable consideration to rest of the city.

We note that the current State Government planning documents describe Hindley Street (east of Morphett Street) as the pre-eminent evening and late-night entertainment hub for metropolitan Adelaide with complimentary shopping, hospitality, mixed business and high density living" If only this was the case, there is very little shopping or mixed business left on the street and the evening and late night venues only are busy for 1 to 1.5 nights a week.

In any instance does the pre-eminent evening and late-night entertainment hub imply it is also the red-light district? The community needs some leadership from the City of Adelaide to challenge this assumption

The Association are eager to work collaboratively with Council and State Government towards a solution that benefits all stakeholders. We hope to schedule a meeting with all concerned parties to discuss these issues in greater depth, involving representatives from tourism, education, hospitality, and the arts sectors.

It is essential that there is equity in the Council's view of our city, and we believe there cannot be a different rule for the West End alone. Let us work together to ensure a thriving, inclusive, and vibrant future for all of Adelaide.

Yours sincerely,

Taren Hocking
President
for and on the behalf of The Adelaide West End Association inc.

adelaide west end association

PO BOX 10502
Adelaide, BC
SA 5000

m: +61 0419 852 518
e: coordinator@adelaidewestend.com.au
w: www.adelaidewestend.com.au

The Right Honourable The Lord Mayor of Adelaide
Dr Jane Lomax-Smith AM
City of Adelaide
GPO Box 2252

Dear Lord Mayor, City Councillors and Stakeholders

CC: Minister Zoe Bettison – Minister for Tourism, Minister Lucy Hood Minister for Adelaide

Re: The Draft Adult Entertainment Premises Code Amendment released for public consultation from **11 June to 23 July 2024**

On behalf of the Accommodation General Managers of the West End, including Hotel Grand Chancellor Adelaide, Holiday Inn Express, Miller Apartments, Mayfair Hotel, Rockford Hotel, Sofitel Adelaide, Chancellor on Currie, The Playford Hotel – M Gallery and Mercure Grosvenor, I am writing to express concerns regarding the Adult Entertainment Premises Code amendments proposal to implement a buffer zone in the city, which notably excludes Hindley Street.

We understand and fully support the Council's efforts to enhance the urban environment and ensure safety and liveability for all residents and visitors. However, we are extremely concerned by the decision to omit Hindley Street from this buffer zone, reinforcing the negative perceptions that have long held back the development of this part of the city. This distinction from the rest of the city is in effect a sanctioning of a redlight district in Adelaide's West End.

As we embark on an important evolution for Hindley Street, it is imperative that any amendments to urban planning policies take into consideration the future aspirations and needs of this community.

Hindley St is in dire straits; it has the highest vacancy rate of any city main street and is in a state of disrepair. However, Hindley St and its surrounding areas also boast the Tourism Hub of Adelaide. With 10 international hotels feeding into this street (The largest concentration of hotels within the city), a Convention Centre, a World Class Medical Precinct, as well as the Adelaide Oval, arguably the best stadium in Australia, it is perplexing to make any economic sense of why this decision would be made.

The condition and tenancy mix of Hindley Street effects the local, national and international reputation of the city. Hindley Street is no longer a street dedicated to the nighttime economy, nor is it just for 18–25-year-olds visiting the area at night for 6 hours/week. It is visited by world class experts in their fields attending conventions, heads of companies on corporate travel, families attending world class events, underage visitors attending Hindley Street Music Hall and ASO to name but a few. With the highest vacancy rate in the city and with some visitors only attending their hotel and place for the purpose of their travel, do we want a red-light district to represent Adelaide, South Australia?

These realities raise substantial concerns about the rationale behind the exclusion of Hindley Street from the proposed buffer zone. Not only does this decision overlook the diverse demographic that frequents the area, but it also poses a risk to the significant investments being made into the redevelopment of Hindley Street by council as well as the push by Renew Adelaide to secure tenants into the vacant tenancies within Hindley St.

We note that the current State Government planning documents describe Hindley Street (east of Morphett Street) as the "pre-eminent evening and late-night entertainment hub for metropolitan Adelaide with complimentary shopping, hospitality, mixed business and high density living" If only this was the case, there is very little shopping or mixed business left on the street and the evening and late night venues only are busy for 1 to 1.5 nights a week. In any instance does the pre-eminent evening and late-night entertainment hub imply it is also the red-light district? The community needs some leadership from the City of Adelaide to challenge this assumption

Now is the time to change the narrative of Hindley St. Not only should a buffer be applied to Hindley St, a complete review of the zoning of Hindley St needs to be undertaken. If the Adelaide City Council and the South Australian Government are serious about attracting international and domestic conferences and events along with permanent investment from these markets into Adelaide, Hindley St needs a new story.

We call on Adelaide City Council to no longer single out Hindley St and allow Hindley St to be treated like the rest of the city. Furthermore, we call on the South Australian State Government to review the zoning of Hindley St, allowing the street to live up to its potential as one of the great West Ends of the world.

Yours sincerely,

Tony Scrivener

General Manager – Hotel Grand Chancellor Adelaide

On behalf of

Alex Schumann	**Group General Manager Miller, Franklin and Frome Apartments**
Alison Baker	**Hotel Manager Mayfair Hotel**
Hope Donaldson	**Hotel Manager Holiday Inn Express Adelaide**
Neil Paterson	**General Manager Grosvenor Hotel Adelaide**
Peter Emery	**General Manager Rockford Adelaide**
Scott Eger	**General Manager Sofitel Adelaide**
Steve Finlayson	**General Manager The Playford Adelaide**
Tim Shih	**Hotel Manager The Chancellor on Currie**
Tony Scrivener	**General Manager Hotel Grand Chancellor Adelaide**

Draft Social Infrastructure (Assets) Policy for Public Consultation

Tuesday, 5 November 2024

City Planning, Development and Business Affairs Committee

Strategic Alignment - Our Community

Program Contact:
Sarah Gilmour, Associate Director Park Lands, Policy & Sustainability

Public

Approving Officer:
Ilia Houridis, Director City Shaping

EXECUTIVE SUMMARY

The purpose of this report is to seek endorsement of a draft Social Infrastructure (Assets) Policy (the draft Policy) (Attachment A), for the purposes of public consultation.

Development of the Policy is a strategic target in the City of Adelaide Strategic Plan 2024-2028:

> *"Develop a Social Infrastructure Policy by 2024 to support our current and emerging community needs".*

The endorsed City Plan - Adelaide 2036, was informed by a detailed social infrastructure assessment and identifies locations for social infrastructure based on factors such as population growth, accessibility, land availability, and integration with other land uses.

To support the City of Adelaide in delivering social infrastructure, the draft Policy focuses on the buildings and spaces that facilitate the delivery of social services by governments and other service providers (referred to as social infrastructure assets).

The draft Policy aims to guide the planning and development of social infrastructure assets to better serve community needs and population growth through the timely delivery of, and equitable access to, social infrastructure.

The draft Policy is proposed to be applied through a planning framework that includes:

- Direction setting through the City Plan - Adelaide 2036
- Investment planning through developing a Community Facilities Investment Plan (proposed Investment Plan) that will inform the Long-term Financial Plan (future stage of work)
- Service planning to ensure community needs are met, including marginalised and vulnerable population groups.

Pending Council decision on the draft Policy, public consultation will be undertaken in early 2025. The consultation will seek feedback on the draft Policy objectives and principles and stakeholders' priorities for social infrastructure asset planning and delivery.

Consultation feedback on the draft Policy will inform the development of a Community Facilities Investment Plan which will prioritise investment in the development, upgrade or consolidation of community facilities to meet current and future needs. The Community Facilities Investment Plan is a future stage of work and will be subject to a separate Council decision.

RECOMMENDATION

The following recommendation will be presented to Council on 12 November 2024 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the draft City of Adelaide Social Infrastructure (Assets) Policy as contained in Attachment A to Item 7.5 on the Agenda for the City Planning, Development and Business Affairs Committee held on 5 November 2024, for the purposes of public consultation.
2. Endorses the draft City of Adelaide Social Infrastructure (Assets) Policy, Engagement Plan as contained in Attachment B to Item 7.5 on the Agenda for the City Planning, Development and Business Affairs Committee held on 5 November 2024.
3. Authorises the Chief Executive Officer, or delegate, to make minor, typographical or syntactical updates to Attachment A and Attachment B as contained in Item 7.5, on the Agenda for the City Planning, Development and Business Affairs Committee on 5 November 2024 for the purposes of finalising the documents for public consultation.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Community Develop a Social Infrastructure Policy by 2024 to support our current and emerging community needs
Policy	This report seeks endorsement to proceed to public consultation on a draft Social Infrastructure (Assets) Policy. The draft Policy is informed by a social infrastructure assessment, the City Plan – Adelaide 2036 and the Strategic Plan 2024-2028.
Consultation	Pending Council decision, consultation will be undertaken in accordance with the Community Consultation Policy.
Resource	Implementation of the Policy will be considered through the proposed Community Facilities Investment Plan (proposed Investment Plan). The proposed Investment Plan will prioritise investment in the development, upgrade or consolidation of community facilities to meet current and future needs. The Investment Plan is a future stage of work and will be subject to a separate Council decision. It will inform Council's Long-term Financial Plan.
Risk / Legal / Legislative	Not as a result of this report
Opportunities	The development of a Social Infrastructure (Assets) Policy will clarify the role of Council, other levels of government, the community and private sector in the planning and development of social infrastructure for the City of Adelaide.
24/25 Budget Allocation	Not as a result of this report
Proposed 25/26 Budget Allocation	Implementation of the draft Policy and proposed Investment Plan would be subject to prioritisation through the Annual Business Plan and Budget processes.
Life of Project, Service, Initiative or (Expectancy of) Asset	The draft Social Infrastructure (Assets) Policy has a ten-year planning horizon. The proposed Investment Plan has a ten-year delivery focus from 2025-2035.
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

Background

1. The purpose of this report is to seek endorsement of a draft Social Infrastructure (Assets) Policy (the draft Policy) (**Attachment A**), for the purpose of public consultation.
2. Development of the Policy is a strategic target in the City of Adelaide Strategic Plan 2024-2028 (Strategic Plan):
    2.1. Develop a Social Infrastructure Policy by 2024 to support our current and emerging community needs.
3. The endorsed City Plan - Adelaide 2036, was informed by a detailed social infrastructure assessment and identifies locations for social infrastructure based on factors such as population growth, accessibility, land availability, and integration with other land uses.
4. The City Plan defines social infrastructure broadly, based on definitions used in State Planning Policies and by Infrastructure Australia:
    4.1. Social infrastructure is the interdependent mix of facilities, places, spaces, programs, projects, services and networks that maintain and improve the standard of living and quality of life in a community.
5. The draft Policy focuses on the buildings and spaces that facilitate the delivery of social services by governments and other service providers (referred to as social infrastructure assets).
6. For the purposes of the draft Policy, Community Buildings in the Adelaide Park Lands are excluded as they are addressed through the Adelaide Park Lands Community Buildings (Sport and Recreation) Policy and Investment Plan.

Draft Social Infrastructure (Assets) Policy (Attachment A)

7. The draft Policy aims to guide the planning and development of social infrastructure assets to better serve community needs and population growth through the timely delivery of, and equitable access to, social infrastructure. The draft Policy:
    7.1. Acknowledges the role of social infrastructure in creating an equitable, inclusive and liveable city, as per the Strategic Plan.
    7.2. Defines social infrastructure and the Policy's role in planning for buildings and spaces. Service delivery is addressed in the application of the Policy through service planning.
    7.3. Sets out three Policy objectives:
        7.3.1. Place-based planning: Take a place-based approach to planning and developing social infrastructure assets at the neighbourhood and city-wide scale to address community needs now and for future generations.
        7.3.2. Equitable access: Ensure users' access to social infrastructure assets is convenient, easy, and affordable, recognising that marginalised and vulnerable populations benefit most from equitable access.
        7.3.3. Coordination and delivery: Enable shared investment, programming, and timely delivery of social infrastructure assets to strengthen their community value and support sustainable city growth.
    7.4. Includes four policy principles:
        7.4.1. Responsive: Responsive to current and future community need.
        7.4.2. Accessible: Well located and designed for access and social inclusion.
        7.4.3. Adaptable: Designed to be flexible and adaptable to changing needs.
        7.4.4. Sustainable: Sustainable delivery and operation of facilities.
    7.5. Outlines the City of Adelaide's roles in social infrastructure asset provision:
        7.5.1. Owner/Custodian/Direct Provider
        7.5.2. Leader
        7.5.3. Partner
        7.5.4. Facilitator

7.5.5. Advocate.

8. Application of the draft Policy is proposed to occur through a policy framework that includes:

8.1. Place-based planning and assessment:

8.1.1. The City Plan – Adelaide 2036 sets the long-term vision and strategic goals for the development and enhancement of social infrastructure, ensuring alignment with the city's overall objectives for growth and community well-being.

8.1.2. The City Plan digital tool (CoADE) will be used to determine suitable locations for social infrastructure facilities based on factors such as accessibility, land availability, and integration with other land uses.

8.2. Community Facilities Investment Plan (proposed Investment Plan). The proposed Investment Plan is a future stage of work. It will:

8.2.1. Prioritise investment in the development, upgrade or consolidation of community facilities to meet current and future needs.

8.2.2. Include details on population and floorspace benchmarks and elaborate on design guidelines based on the agreed principles.

8.2.3. Discuss funding and investment mechanisms such as government funding, developer contributions, public/private partnerships and social impact investment.

8.2.4. Inform the City of Adelaide's Long-term Financial Plan.

8.3. Service Planning:

8.3.1. Planning services to address community needs, recognising marginalised and vulnerable population groups benefit most from equitable access.

8.3.2. Recognising that in a capital city context, the City of Adelaide provides services at a regional, district and local level.

Next Steps

9. Subject to Council decision on the draft Policy, public consultation will be undertaken in early 2025 to:

9.1. Seek feedback on the draft Policy objectives and principles.

9.2. Understand key stakeholders' priorities for social infrastructure asset planning and delivery.

10. A high–level Engagement Plan is provided in Attachment B.

11. Consultation feedback on the draft Policy will inform the development of a Community Facilities Investment Plan as a future stage of work which will be subject to a separate Council decision.

ATTACHMENTS

Attachment A – Draft City of Adelaide Social Infrastructure (Assets) Policy

Attachment B – Draft City of Adelaide Social Infrastructure (Assets) Policy, High-Level Engagement Plan

- END OF REPORT -

SOCIAL INFRASTRUCTURE (ASSETS) POLICY

Date this document was adopted *non-legislative*

PURPOSE

This Policy guides strategic investment in social infrastructure assets to achieve outcomes aligned with agreed-upon objectives and principles, delivering community resilience, and social impact.

Social infrastructure is the interdependent mix of facilities, places, spaces, programs, projects, services and networks that maintain and improve the standard of living and quality of life in a community.

This Policy focuses on the buildings, enabling infrastructure and community spaces that facilitate the delivery of social services by governments and other service providers (social infrastructure assets). While assets are often considered individually, social infrastructure networks play a significant role in supporting liveability, sustainability, and the economy.

This Policy excludes Community Buildings in the Adelaide Park Lands which are informed by the Adelaide Park Lands Community Buildings (Sport and Recreation) Policy and Adelaide Park Lands Management Strategy.

STATEMENT

This Policy acknowledges the role of social infrastructure in creating an equitable, inclusive and liveable city.

It aims to guide the planning and development of social infrastructure assets to better serve community needs and population growth through the timely delivery of, and equitable access to, social infrastructure.

Investing in social infrastructure assets in the right place at the right time will support community facilities that contribute to social fabric, identity, and connection.

Policy Objectives

1. Place-based planning**:** Take a place-based approach to planning and developing social infrastructure assets at the neighbourhood and city-wide scale to address community needs now and for future generations.

2. Equitable access**:** Ensure users' access to social infrastructure assets is convenient, easy, and affordable, recognising that marginalised and vulnerable populations benefit most from equitable access.

3. Coordination and delivery: Enable shared investment, programming, and timely delivery of social infrastructure assets to strengthen their community value and support sustainable city growth.

Policy Principles

Responsive **Responsive to current and future community need**	Planning and addressing community need at a neighbourhood and capital city scale. Using population benchmarks, including population forecasts, to assist in determining facility level and floor space requirements. Recognising the role of social infrastructure in emergency management such as extreme weather response for people sleeping out.
Accessible **Well located and designed for access and social inclusion**	Sharing and integrating facilities through co-location, partnerships and a mix of services (such as social services with residential and/or commercial development). Using existing well-located infrastructure including reuse of buildings. Locating assets where there is access to active and public transport (such as centrally located within neighbourhood or main street settings), including end of trip facilities. Applying universal design and access principles to the design and management of community facilities (such as sensory spaces).
Adaptable **Designed to be flexible and adaptable to changing needs**	Ensuring that by design and management, social infrastructure assets are flexible and adaptable to changing needs. Enhancing visibility, comfort, and safety for access day and night. Connecting to the public realm, private and public outdoor spaces, and natural elements for enhanced user experience. Contributing to the provision of public amenities including public toilets, drinking water, technology, charging points and places to shelter; and spaces for functions including kitchen facilities, storage, loading areas and limited on-site car parking. Using public art and design elements for cultural expression and interpretation.

Sustainable **Sustainable delivery and operation of facilities**	Promoting sustainable practices in the development and management of social infrastructure, including financial responsibility, economic and social returns. Maximising the value of social infrastructure assets through programming, maintenance, and renewal. Staging the delivery of assets to enable timely responses to existing and future community needs. Enabling community-led approaches, capacity building and cultural recognition.

City of Adelaide Roles

Role	Description	Social Infrastructure Asset Type/Function
Owner/Custodian/ Direct Provider	Provide funding, planning and operation of social infrastructure assets.	Community centres and libraries (community hubs), public toilets and playspaces
Leader	Lead policy settings to enable social infrastructure assets delivery through appropriate land use and land economics within the City of Adelaide. Adequate allocation of social infrastructure assets to enable economic delivery and thriving communities.	Social infrastructure assets
Partner	Partner with government, non-government, community and private sector partners to deliver social infrastructure outcomes.	Sport and recreation facilities, arts and culture facilities, community gardens, maker spaces, youth spaces

Facilitator	Facilitate social infrastructure outcomes through coordination, brokerage and support.	Sport and recreation facilities, arts and culture facilities, community gardens, maker spaces, youth spaces
Advocate	The City of Adelaide, as the capital city, provides facilities for the Greater Adelaide region, which is also experiencing population growth. Advocate to the State and Federal government for social infrastructure asset outcomes within the remit of other levels of government. Represent community interests to influence social infrastructure outcomes.	Early childhood education and care, education and training, primary and community health

APPLICATION

The City of Adelaide will implement this Policy through a policy framework (Appendix A) that includes:

1. Place-based planning and assessment
2. Community Facilities Investment Plan (proposed Investment Plan)
3. Service planning.

Place-based planning and assessment

The City Plan – Adelaide 2036 provides a long-term vision and strategic goals for the development and enhancement of social infrastructure, ensuring alignment with the city's overall objectives for growth and community well-being.

The City Plan integrates social infrastructure considerations into broader urban planning and development policies, ensuring that infrastructure development supports the city's strategic aims and recognises social infrastructure delivery as a city shaping investment.

The City Plan digital tool (CoADE) will be used to determine suitable locations for social infrastructure facilities based on factors such as accessibility, land availability, and integration with other land uses.

Community Facilities Investment Plan

The City of Adelaide will implement this Policy through the Community Facilities Investment Plan. The Plan will prioritise investment in the development, upgrade or consolidation of community facilities to meet current and future needs.

The Plan will include details on population and floorspace benchmarks, elaborate on design guidelines based on the agreed principles, and discuss funding and investment mechanisms such as government funding, developer contributions, public/private partnerships and social impact investment.

Service Planning

The City of Adelaide will plan services to address community needs, recognising marginalised and vulnerable population groups benefit most from equitable access.

The City of Adelaide recognises and that in a capital city context, it provides services at a regional, district and local level.

OTHER USEFUL DOCUMENTS

Related documents

- Active City Strategy
- Adelaide Park Lands Building Design Guidelines
- Adelaide Park Lands Community Buildings (Sport and Recreation) Policy (in development)
- Adelaide Park Lands Management Strategy
- Assessment Management Plans
- City Plan – Adelaide 2036
- Economic Development Strategy – A thriving economy for all
- Disability Access and Inclusion Plan
- Future Fund and Investment Policy
- Homelessness Strategy – Everyone's Business
- Housing Strategy – Investing in our housing future
- Property Strategy (In development)
- Public Toilets Operating Guidelines
- Reconciliation Action Plan
- Social Infrastructure Assessment (Internal)
- Public Toilet Assessment (Internal)

Relevant legislation

- *Local Government Act 1999 (SA)*
- *Planning, Development and Infrastructure Act 2016 (SA)*
- *Public Health Act 2011(SA)*

GLOSSARY

Adelaide Park Lands: Those areas of the Adelaide Park Lands defined by the Adelaide Park Lands Plan under the *Adelaide Park Lands Act 2005*, and including the City Squares and Gardens, roads running through or bordering the Adelaide Park Lands; and any other land vested in or under the care, control or management of, the Crown, a state authority or a local government body.

Integrated Planning: Integrated planning coordinates the strategic use of land with the necessary services and infrastructure.

Neighbourhood: The City Plan – Adelaide 2036 provides a Local Area Framework that describes the unique attributes and identity, place principles and investment priorities for thirteen neighbourhoods across the City of Adelaide, including key social infrastructure assets.

Main Street: The City Plan – Adelaide 2036 references creating a series of main streets to be the vibrant arteries of urban life in the city, serving as the heart of the city's commercial and social activity.

Social Services: Also known as human services, the formal services that provide support, advice, education and information to a wide range of groups within a community.

Social Infrastructure: Social infrastructure is the interdependent mix of facilities, places, spaces, programs, projects, services, and networks that maintain and improve the standard of living and quality of life in a community. (*Definition: State Planning Policies for SA*).

Social Infrastructure Assets: The buildings and spaces that facilitate the delivery of social services by governments and other service providers. While assets are often considered individually, social infrastructure networks play a significant role in supporting liveability, sustainability, and the economy (*Definition: Infrastructure Australia*).

ADMINISTRATIVE

As part of Council's commitment to delivering the City of Adelaide Strategic Plan, services to the community, and transparent information, all policy documents are reviewed as per legislative requirements. When no such provision is made, a risk assessment approach is taken to guide the review timeframe.

This Policy document will be reviewed every **five years** unless legislative or operational change occurs beforehand. The next review is required in **2029.**

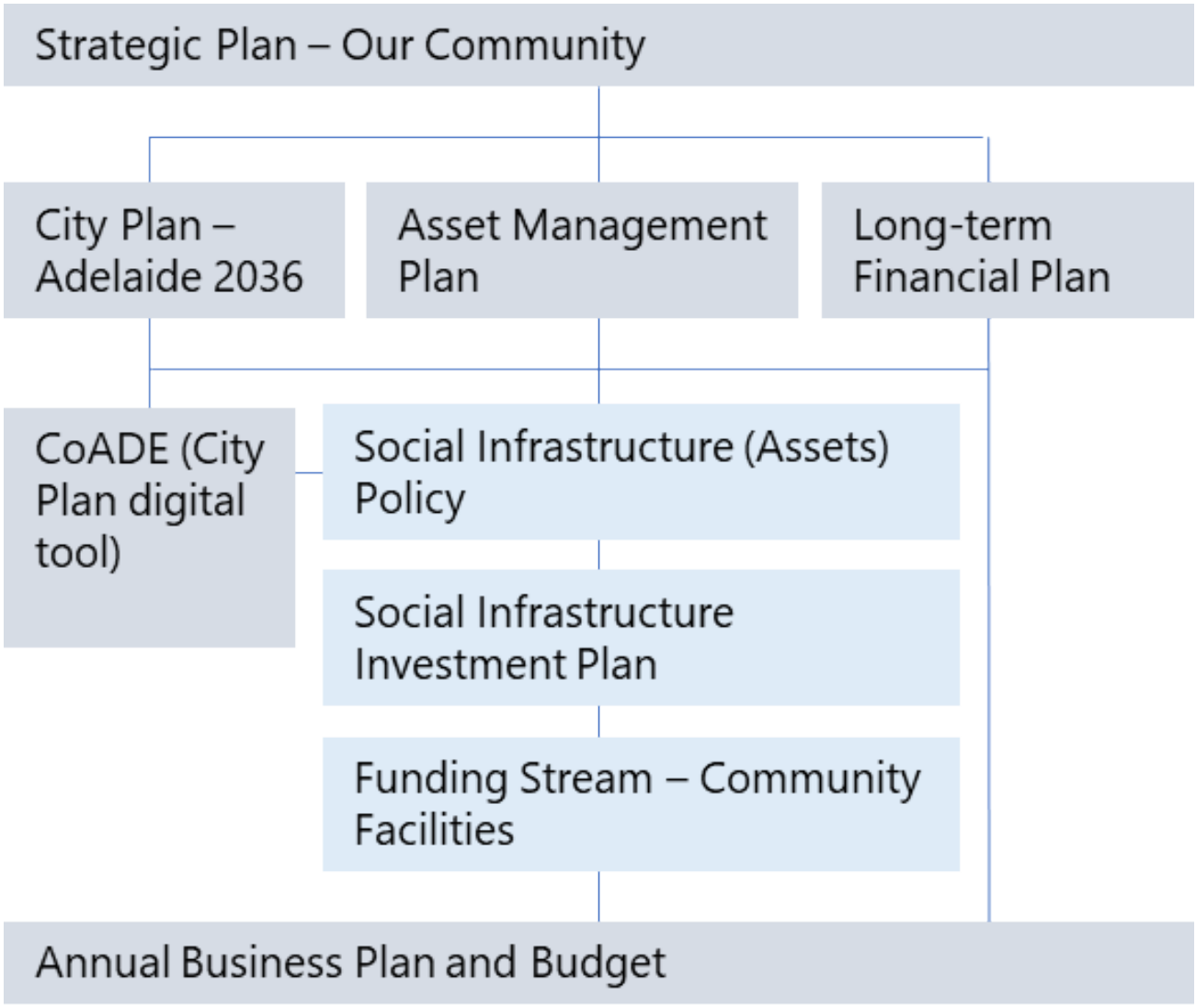
Review history:

Trim Reference	Authorising Body	Date/ Decision ID	Description of Edits
ACC2024/126364	Council	Pending	NA

Contact:

For further information contact the Park Lands, Policy & Sustainability Program.
City of Adelaide
25 Pirie ST, Adelaide, SA
GPO Box 2252 ADELAIDE SA 5001
+61 8 8203 7203
city@cityofadelaide.com.au

Appendix A – Policy Framework



High Level - Engagement Plan

PURPOSE OF YOUR ENGAGEMENT

The engagement process seeks feedback on the Policy proposed objectives and principles and seeks to understand key stakeholders' priorities for social infrastructure asset planning and delivery.

Feedback will also inform the development of a Community Facilities Investment Plan. The proposed Investment Plan is a future stage of work and will be subject to a separate Council decision. The proposed Investment Plan will prioritise investment in the development, upgrade or consolidation of community facilities to meet current and future needs.

The proposed Investment Plan excludes Community Buildings in the Adelaide Park Lands which are informed by the Adelaide Park Lands Community Buildings (Sport and Recreation) Policy and Adelaide Park Lands Management Strategy.

Feedback from stakeholders will be sought to:

- Inform the community about the development of the Social Infrastructure (Assets) Policy and seek feedback on proposed objectives and principles from key stakeholders.
- Consult with key stakeholders about their priorities for social infrastructure assets to inform the development of a draft Community Facilities Investment Plan.

BACKGROUND INFORMATION

The Social Infrastructure (Assets) Policy will guide strategic investment in social infrastructure to achieve outcomes aligned with agreed objectives and principles related to community health, well-being, social inclusion, sustainability, and economic development.

Social Infrastructure Definition

Social infrastructure is comprised of the facilities, spaces, services and networks that support the quality of life and wellbeing of our communities. It helps us to be happy, safe and healthy, to learn, and to enjoy life. The network of social infrastructure contributes to social identity, inclusion and cohesion and is used by all people at some point in their lives, often on a daily basis. (Definition: Infrastructure Australia).

Social Infrastructure Assets Definition

This policy focuses on social infrastructure assets, the buildings and spaces that facilitate the delivery of social services by governments and other service providers. While assets are often considered individually, social infrastructure networks play a significant role in supporting liveability, sustainability, and the economy (Definition: Infrastructure Australia).

STRATEGIC LINK

This policy aligns with the Strategic Plan 2024-2028, which highlights social infrastructure as essential for meeting current and future community needs. It supports the 'Our Community' outcome of an inclusive, equitable, and welcoming environment where people feel a sense of belonging.

Social infrastructure is also emphasised in local, state, and federal strategic documents, including the City Plan (CoA), Greater Adelaide Regional Plan (State Government), and the 2021 Australian Infrastructure Plan (Federal Government), as crucial for sustainable population growth.

LEGISLATIVE REQUIREMENTS

Council has no legislative requirement to engage on this policy. Council's Community Consultation Policy will be used to guide the process.

TIMEFRAMES

Timeframes	Action	Comment
5 November 2024 and 12 November 2024	Report to Committee and Council on the draft Social Infrastructure (Assets) Policy.	Identify key opportunities for change to Council policy.
6 January 2025 to 28 February 2025	Engagement (eight weeks)	A range of tools will be used to communicate and seek feedback these include: Social and digital platforms Our Adelaide Engagement Pack with Survey (hardcopy and online) Targeted stakeholder engagement including government agencies, city service providers, local government networks and

		with key resident and precinct groups Emails and website.

LEVEL OF ENGAGEMENT

Level of Engagement	Inform	Consult	Involve	Collaborate	Empower
Goal	One way communication to provide balanced and objective information to assist understanding about something that is going to happen or has already happened.	Two way communications designed to obtain feedback on ideas, alternatives and proposals to inform our decision making.	Participatory process designed to help identify issues and views to ensure that concerns and aspirations are understood and considered prior to our decision making.	Working together to develop an understanding of all issues and interests to work out alternatives and identify preferred solutions for joint decision making.	We may facilitate the process and/or upskill community. Places final decision-making in the hands of the community.
Approach	We will share information about a decision or direction.	We will explore options, gain feedback and an understanding of your concerns and preferences.	We will involve you in the process so your ideas, concerns and aspirations are reflected in the alternatives developed or the final decision.	We will collaborate with you so your advice, innovation and recommendations are included in the final decision that we make together.	We will implement, or support you to implement what you decide.
Role of Stakeholder/ Community	Listen	Contribute	Participate	Partner	Decide

EVALUATION PLAN

Feedback received through the consultation process will be collated and reported to Council via the finalised Social Infrastructure (Assets) Policy and proposed Community Facilities Investment Plan.

The consultation will be evaluated with the following performance indicators:

- Feedback from stakeholders and community members
- Feedback about the process
- Consultation timeframes followed.

City Safety Compliance and Enforcement Policy

Strategic Alignment - Our Corporation

Public

Tuesday, 5 November 2024

City Planning, Development and Business Affairs Committee

Program Contact:
Steve Zaluski, Associate Director Regulatory Services

Approving Officer:
Ilia Houridis, Director City Shaping

EXECUTIVE SUMMARY

The City of Adelaide has responsibilities for monitoring compliance and ensuring public safety and amenity under various pieces of legislation. This includes responding to requests from community members regarding alleged instances of non-compliant activity.

This report follows findings from an Internal Audit on Community Safety (the Audit) completed in December 2023. The Audit identified opportunities to provide improved documentation regarding the prioritisation of alleged instances of non-compliant activities reported in the public realm.

In response to the Audit, a review has been undertaken encompassing a series of documents that govern Council's approach to compliance and enforcement. As a result, updates or changes to several documents are outlined in the report.

A summary of the updates provided in this report is as follows:

- Order Making Policy – reviewed with very minor changes proposed
- City Safety Compliance and Enforcement Policy – new document outlining the principles of our approach, superseding the Environmental Health Management Policy
- Environmental Health Management Policy – proposed to be rescinded and incorporated into the new City Safety Compliance and Enforcement Policy
- City Safety Compliance and Enforcement Guideline – operational guidelines enhanced to increase information to the community regarding how alleged breaches are prioritised.

The City Safety Compliance and Enforcement Policy provides transparency in how compliance matters are approached and how Council's resources are deployed. The Policy also outlines the roles of the Administration, Council Members, and members of the public during investigations and compliance matters.

The City Safety Compliance and Enforcement Guideline and accompanying Prioritisation Framework are shared for noting and Council awareness. The operational guidelines are based on legislative obligations in addition to a risk assessment of the broad types of compliance issues that can occur within the city. The intent of providing this as a public document is for community transparency in how actions are prioritised. The Framework is a broad guide and does not dictate nor detract from using discretion in responding to context-specific circumstances.

Related to this work, Council's Order Making Policy has undertaken its scheduled review, with minor amendments proposed in line with Section 259 of the *Local Government Act 1999 (SA).* Given that this policy reflects legislated functions, public consultation is not required.

The review of these documents continues Council's approach of delivering a safe and accessible City for all, while adopting an educational approach to achieve voluntary and informal compliance as a first preference, followed by enforcement and expiation where relevant.

RECOMMENDATION

The following recommendation will be presented to Council on 12 November 2024.

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the City Safety Compliance and Enforcement Policy, as Attachment A to Item 7.6 on the Agenda for the meeting of City Planning, Development and Business Affairs Committee held on 5 November 2024.
2. Approves the amendments to the Order Making Policy, as Attachment B to Item 7.6 on the Agenda for the meeting of City Planning, Development and Business Affairs Committee held on 5 November 2024.
3. Approves the rescinding of the Environmental Health Management Policy 2020.
4. Notes the City Safety Compliance and Enforcement Guideline as Attachment C to Item 7.6 on the Agenda for the meeting of City Planning, Development and Business Affairs Committee held on 5 November 2024.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Corporation – Effective Leadership and Governance. Enable effective governance, risk management, accountability and transparency at all times in decision making.
Policy	The Order Making Policy has been reviewed and the amendments made are minor in nature and remain in line with Section 259 of the *Local Government Act 1999 (SA)*. The City Safety Compliance and Enforcement Policy will supersede the existing Environmental Health Management Policy. Each of the revised documents reflect current practice and are not intended to alter Council's approach to these matters.
Consultation	Not as a result of this report
Resource	The Policy assures alignment of current resources to ensure that activities are scheduled to manage the highest risks as a priority.
Risk / Legal / Legislative	Council has legislative responsibilities under various legislation to address safety issues.
Opportunities	To provide increased transparency to the community of Council's approach to supporting a safe environment and efficient service.
24/25 Budget Allocation	Not as a result of this report
Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	Ongoing through business-as-usual activities.
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

Background

1. The City of Adelaide (CoA) has legislated responsibilities relating to public safety and compliance under various Acts, including but not limited to:
    1.1. *The Local Government Act 1999 (SA)*
    1.2. *The Local Nuisance and Litter Control Act 2016*
    1.3. *The Planning, Development and Infrastructure Act 2016*
    1.4. *The Dog and Cat Management Act 1995*
    1.5. *The Fire and Emergency Service Act 2005*
    1.6. *The Public Health Act 2011*
    1.7. City of Adelaide By-laws.
2. An Internal Audit on Community Safety (the Audit) conducted in December 2023 identified the opportunity to provide improved documentation on how alleged instances of non-compliant activities in the public realm are prioritised and actioned within CoA.
3. CoA prides itself on being responsive to customer requests, meeting legislative obligations appropriately and proactively mitigating public safety risks while working with community and stakeholders to create a vibrant city.
4. While noting the large volume of requests received, the Audit identified that determining responses to such matters was documented internally, rather than made transparent publicly.

Actioning the Audit Findings

5. The City Safety Compliance and Enforcement Policy (the Policy), **Attachment A,** has been developed in response to these findings and is submitted to Council for endorsement. This policy supersedes the current Environmental Health Management Policy (Link 1), providing increased transparency and consistency to our community.
6. The City Safety Compliance and Enforcement Guideline (the Guideline) has been updated, which is attached for noting as **Attachment C**.
7. Council's Order Making Policy has also been reviewed, with the revised version provided in **Attachment B**.
8. The Order Making Policy is a required document under Section 259 of the *Local Government Act 1999 (SA)*.
9. The review found this policy remains appropriate, and as such only minimal changes have been made to reflect current legislation and organisational structure. Track changes are highlighted in the revised draft document in Link 2.

Community Safety Compliance Facts and Figures

10. The scope of the documents encompass compliance across community safety, environmental health, development and building functions. They do not reflect our response to On-Street Parking Compliance, which is covered in other documents.
11. For context of the volume and breadth of scope, in 2023/24:
    11.1. CoA's Community Safety team received over 4,000 requests from the community relating to concerns or potential non-compliant activities in the public realm. These requests related to:
        11.1.1. 16% - Local Nuisance (general, noise, dust, smoke, odour)
        11.1.2. 14% - Dog Management (barking, harassment, attacks, wandering, registrations)
        11.1.3. 13% - Hard Rubbish/Illegal Dumping
        11.1.4. 11% - Reporting a hazard (no damage/injury)
        11.1.5. 11% - Rough sleeping
        11.1.6. 5% - Accidents (injury or property damage)
        11.1.7. 30% - Miscellaneous.
    11.2. CoA's Environmental Health Officers conducted in excess of 1350 inspections and requests:
        11.2.1. 800 scheduled food inspections

11.2.2. 450 scheduled cooling tower inspections

11.2.3. 130 responses to community requests, mainly concerning food businesses.

11.3. CoA's Development Compliance Officers, dealt with over 800 matters including:

11.3.1. Conducting 245 scheduled building inspections

11.3.2. Responding to 600 community requests relating to building matters.

12. In the delivery of each of these core local government services, Administration continually monitors response times, resolutions, and our inspection frequency rates in comparison to other jurisdictions to ensure we maintain an appropriate level of service for the community.

Purpose of the City Safety Compliance and Enforcement Policy

13. CoA's Strategic Plan 2024-2028 (the Plan) sets out our vision as a capital city and a local government. To deliver on the Plan's aspirations for Our Community, Our Economy, Our Environment and Our Places, CoA ensures our legislated and regulatory obligations are undertaken to keep the city safe, clean and accessible.

14. The Policy and operational guidelines provide a framework for approaching compliance and enforcement activities in a fair, balanced and consistent manner.

15. The Policy's intent is to clarify, rather than limit, the approach for Authorised Officers to act appropriately under legislation, using their professional expertise in assessing responses to the unique circumstances of each case.

16. The Policy guides Council's response and distribution of resources to manage the highest risks to safety as a priority. It sets out the following principles for managing regulatory compliance matters:

16.1. acting in accordance with the principles of natural justice and the rule of law.

16.2. deploying a risk-based prioritisation to the allocation of compliance and enforcement resources.

16.3. delivering a proportionate response to compliance matters, scaling our actions to the seriousness of a breach.

16.4. seeking voluntary compliance and using education first, undertaking formal action only when necessary and appropriate to do so.

16.5. collecting, using and storing all investigative information appropriately.

16.6. seeking inter-agency cooperation with other compliance and enforcement agencies at a Local, State and Federal level to achieve compliance outcomes.

17. The Policy defines the roles of other parties in the process, such as the community and Council Members.

18. In support of the Policy, the accompanying Guideline has been updated and now includes a public-facing 'Prioritisation Framework', that:

18.1. has been developed from legislated obligations and a risk assessment on the inherent risk to public safety of various activities or offences.

18.2. is developed to provide improved community awareness and transparency of how legislated activities are prioritised as per the Internal Audit recommendation.

18.3. acts as a broad guide and does not encompass all possible requests.

18.4. does not dictate nor detract from the approaches taken by Authorised Officers in responding to context-specific circumstances.

18.5. contemporises, rationalises and formalises former policies and Administration's approach in a public document.

19. If endorsed, the Policy will supersede Council's Environmental Health Management Policy, providing transparency and consistency for our community.

20. The Policy and Guideline formalise the currently adopted approach and practice. No changes proposed in this report materially alter CoA's current approach to compliance and enforcement activities.

DATA AND SUPPORTING INFORMATION

Link 1 – Environmental Health Management Policy

Link 2 – Draft Order Making Policy with tracked changes

ATTACHMENTS

Attachment A – City Safety Compliance and Enforcement Policy

Attachment B – Order Making Policy

Attachment C – City Safety Compliance and Enforcement Guideline

- END OF REPORT -

CITY SAFETY COMPLIANCE AND ENFORCEMENT POLICY

November 2024 *non-legislative*

PURPOSE

This policy outlines Council's approach to delivering community safety compliance and enforcement activities in a fair, balanced and consistent manner. The policy complements Council's Order Making Policy in administering a range of legislation, regulations and by-laws that enable a safe, healthy, welcoming and vibrant environment for all.

The policy encompasses both proactive monitoring and undertaking investigations into concerns raised by members of the public.

The policy supports the Council's Authorised Officers to exercise judgement and act in accordance with the legislation, taking into account their professional expertise and the unique circumstances of each case. The scope covers community safety functions across a wide range of legislative obligations, including but not limited to Council's role in administering the:

- *Planning Development Infrastructure Act 2016*
- *Local Government Act 1999 (SA)*
- *Local Nuisance & Litter Control Act 2016 (SA)*
- *Public Health Act 2011*
- *Food Act 2001*
- National Construction Code
- Council By-laws, Policies and Guidelines.

The policy does not address Council's approach to enforcing offences relating to on-street parking.

PRINCIPLES

The intent of Council's approach to compliance and enforcement is to undertake our legislated and regulatory obligations with due diligence – and in doing so to keep the city safe, clean and accessible for all.

The City of Adelaide is committed to the following principles in all compliance and enforcement activities:

- Acting in accordance with the principles of natural justice and the rule of law.
- Deploying a **risk-based prioritisation** to the allocation of compliance and enforcement resources.
- Delivering a **proportionate response** to compliance matters, scaling our actions to the seriousness of a breach.

- Seeking voluntary compliance and using **education first**, undertaking formal action only when necessary and appropriate to do.
- Collecting, using and storing all investigative information and **data sensitively and appropriately**.
- Seeking **inter-agency cooperation** with other compliance and enforcement agencies at a Local, State and Federal level to achieve community outcomes.

APPLICATION OF POLICY PRINCIPLES

Risk-based Prioritisation

City of Adelaide will undertake proactive compliance monitoring activities and respond to reports of alleged breaches ensuring we:

- assess each matter on its individual circumstances
- prioritise activities according to the seriousness of the issue and the degree of community benefit as a result of successful resolution
- deliver regulatory services and the response to concerns raised in a financially responsible manner, considering the appropriate use of limited resources.

Risk assessment categories include considerations regarding:

- public safety and wellbeing
- environment and amenity
- Council's liability and legislative compliance
- Council's assets and capacity to deliver services
- Council's reputation.

While each case is determined on its merits, the City Safety Compliance and Enforcement Guideline includes a 'Prioritisation Framework', providing transparency to the community in how certain breaches and activities are considered.

A Proportionate Response, Focused on Education

There are a range of enforcement actions available to address non-compliance, ranging from informal to formal.

A proportionate response requires enforcement action and investigations to be scaled to the nature of a breach, generally escalating if breaches are not corrected once raised.

Most community members do not deliberately seek to breach the law. Compliance can often be achieved by educating and providing an opportunity to correct concerns raised. Unless breaches are significant, pose a high risk to public safety, or are deliberate, City of Adelaide adopts an 'education first' approach.

Notwithstanding the above, City of Adelaide will take immediate and firm action against those who flagrantly and/or repeatedly breach the law when circumstances warrant it, and risks to public safety are evident.

A proportionate approach means breaches of lower impact/lower risk or first-time offences are likely to result in less intense forms of enforcement action. In contrast,

higher risk or repeated/serious breaches are likely to result in more intense enforcement action. An example of this approach is summarised in the table below.

Table 1 – Example of a proportionate approach to enforcement action

	Enforcement Action	Seriousness of Breach		
		Low	Medium	High
Level of Enforcement Action	Prosecution		X	X
	Expiation		X	X
	Statutory Notice or Order	X	X	X
	Warning	X	X	X
	Informal action	X		
	No Action	X		

**The table is a broad guide only. Unique circumstances exist in all scenarios, with enforcement action for specific breaches potentially differing to the above guide.*

Data Privacy and Inter-Agency Cooperation

Outside of the requirements of relevant legislation, the City of Adelaide aims not to provide specific details of investigations or enforcement action to members of the public, unless approval from the alleged offender is given.

City of Adelaide acknowledges that those lodging a report will seek to be informed of the outcome, however respects the right to privacy of any person under investigation or who has been the subject of enforcement action.

At all times Council aims not to disclose the identity of a complainant during an investigation. If information is to be shared with an individual alleged to be in breach, personal identifying information will be redacted.

Information relating to alleged offences and investigations may be shared with other government agencies, when deemed appropriate and within legislation. Information will only be shared with the intent to deliver effective community safety and compliance outcomes, noting responsibility for enforcing offences can cross different levels of government. Example agencies that may be involved include, but are not limited to, SAPOL, Consumer and Business Services, the Environment Protection Agency and Safework SA.

TYPES OF ENFORCEMENT ACTION

Enforcement means a combination of advice together with possible actions that can be taken after a breach has been identified. Enforcement action may follow the investigation of a concern raised by the public or from proactive monitoring activities undertaken by City of Adelaide.

While not an exhaustive list, types of enforcement action can include: No Action, Informal Warnings/Advice, Formal Warnings, Expiations, Statutory Enforcement Notices or Orders, or Prosecution.

Council's City Safety Compliance and Enforcement Guideline describes each of these actions, and the situations in which they may be appropriate to be used, in more detail.

When determining appropriate means of enforcement, City of Adelaide will consider, amongst other relevant factors:

- the seriousness of the offence
- the consequences of continued non-compliance
- the degree of wilfulness involved
- the offender's history
- individual circumstances (facts of the matter)
- the likely effectiveness of the various enforcement options
- consistency of approach to similar breaches/offences.

Factors not to be considered include:

- the alleged person's ethnicity, nationality, political association, age, religion, appearance, gender, physical or mental ability, sexuality or beliefs
- personal or professional associations with the alleged offender or any other person involved.

THE ROLE OF OTHER PARTIES

Community Members Lodging Reports

City of Adelaide will assess all reports relating to alleged non-compliant activities and determine whether an investigation is to be commenced.

If it is determined not to investigate a request, the person lodging the report will be notified along with the reasons for the decision. If persistent and continued requests are made in relation to a matter that has been previously determined or not warranting further action, Council may cease further communication about the issue in line with Council's Complaint Handling Guidelines.

Council may seek the continued cooperation of a complainant during an investigation process. This may involve access to a complainants' property or the request for further information including the provision of admissible evidence.

While cooperation during an investigation may not always be necessary, failure to cooperate may result in the investigation being unable to proceed and closed.

Any person not satisfied with Council's response to reports of non-compliant activities may refer the matter for review.

Council Members

Council Members have a role in reinforcing the City Safety Compliance and Enforcement Policy.

It is acknowledged that members of the public may choose to report non-compliant activities observed in the public realm directly to a Council Member.

Non-compliant activities referred to individual Council Members are to be referred to the CEO or their delegate via the approved process, for investigation and appropriate action.

Once referred, Council Members can seek status updates, but remain responsible for acting in line with the Council Member Policies, Procedures and Guidelines.

Individual Council Members are not able to exert pressure, influence or interfere with the investigation, prioritisation or enforcement in relation to an alleged non-compliant activity.

Decision-making in relation to individual investigations, prioritisation and enforcement action for any alleged non-compliant activity remains at all times the responsibility of the CEO, the relevant Authorised Officer, or Council itself.

Council Members can assist the community by satisfying themselves that Council's City Safety Compliance and Enforcement Policy is appropriate and being adhered to.

OTHER USEFUL DOCUMENTS

Related documents

- City Safety Compliance and Enforcement Guideline
- Corporate Complaint Handling Operating Guideline
- Order Making Policy
- Council By-Laws
- Council Member Behavioural Support Policy
- Council Member Staff Interaction Policy

Relevant legislation

- *Planning Development Infrastructure Act 2016*
- *Local Government Act 1999 (SA)*
- *Local Nuisance & Litter Control Act 2016 (SA)*
- *Public Health Act 2011*
- *Food Act 2001*
- *National Construction Code*

GLOSSARY

Throughout this document, the below terms have been used and are defined as:

Authorised Officer: a person appointed by a council as an authorised person.

natural justice: basic or fundamental judicial rights extended to a person involved in a dispute. Proceedings should be unbiased and undertaken in good faith, and each party should have equal access and should be aware of the facts.

ADMINISTRATIVE

As part of Council's commitment to deliver the City of Adelaide Strategic Plan, services to the community and the provision of transparent information, all policy documents are reviewed as per legislative requirements or when there is no such provision a risk assessment approach is taken to guide the review timeframe.

This Policy document will be reviewed every **3** years unless legislative or operational change occurs beforehand. The next review is required in **2027.**

Review history:

Trim Reference	Authorising Body	Date/ Decision ID	Description of Edits
ACC2024/122297	*Council*	*12 November 2024*	*Initial Policy created to provide clarity in relation to compliance and enforcement approach*

Contact:

For further information contact the Regulatory Services Program

City of Adelaide

25 Pirie Street, Adelaide, SA

GPO Box 2252 ADELAIDE SA 5001

+61 8 8203 7203

city@cityofadelaide.com.au

ORDER MAKING POLICY

November 2024 *legislative*

PURPOSE

In accordance with Section 259 of the *Local Government Act 1999 (SA)* (the Act) Council must adopt an Order Making Policy governing the City of Adelaide's (CoA's) responsibilities to take measures to protect the area from hazards and to improve the amenity of the City. The City of Adelaide is committed to utilising the order making powers provided for by the Act to consistently facilitate a safe and healthy environment, and to ensure decisions are fair and equitable.

Further to the above and in accordance with the requirements of the Act, this Policy also applies in respect of orders issued by Council under *Division 4 – Power to require others to carry out work*; Sections 216, 217, and 218 of the Act.

OPERATION

This policy informs the actions of persons who are authorised under the provisions of Section 260 of the Act.

This Policy will apply to:

- Circumstances listed in Section 254 of the Act which states that Council may order a person to do, or refrain from doing, a thing under certain circumstances, as specified in the table included within that section of the Act.
- Circumstances set out in Sections 216, 217 and 218 of the Act which states that Council may order the owner of a road or structure installed in, on, across or under a road to carry out specified under certain circumstances.
- Conduct that constitutes a contravention of the Act or By-laws under the Act as provided for in Section 262 of the Act which states that Council may order an offender to stop the conduct and/or remedy the contravention.
- The above sections of the Act are provided for reference in Attachment A.

Application of this document

Each instance which may result in the use of Council's order making powers will be considered on its merits.

Factors to be considered include:

- severity of the incident
- hazard/danger posed to the community
- risk to health/safety of the community
- detraction from the amenity of the locality
- repeated occurrence of the activity/incident (e.g. duration, previous offences)
- impact of any previous actions to overcome the problem
- significance of the breach
- likely effectiveness of alternative enforcement options
- issues of public interest

- whether there is sufficient evidence upon which Council may rely to exercise its order making powers
- number and nature of reports received in respect of the matter (if any).

Council will take reasonable steps to resolve issues by negotiation and agreement before issuing an order.

Before making an order (except in the case of an immediate risk to safety described below) Council will give notice of its intention to make an order in accordance with Section 255 of the Act by:

- Giving the person(s) to whom an order is intended to be directed a notice in writing stating the:
  - proposed action;
  - terms of the proposed order (i.e. what it requires the person to do or refrain from doing);
  - period within which compliance with the order will be required;
  - penalties for non-compliance; and
  - reasons for the proposed action.
- Inviting the person notified of the opportunity to give reason/s, within a specified time, why the proposed action should not be taken.

  Council will proceed to make an order without negotiation or notice, in accordance with Section 255(12) of the Act where Council considers the circumstance or activity constitutes, or is likely to constitute:
  - a threat to life;
  - an immediate threat to public health or public safety; or
  - an emergency situation.

Further detail on Council's approach to issuing orders and/or utilising other methods to monitor and enforce compliance are outlined in Council's City Safety Compliance and Enforcement Policy.

Right of review

Pursuant to Section 256 of the Act any person to whom an order is issued has a right to appeal against the order. Any such appeal must be lodged with the South Australian Civil and Administrative Tribunal (SACAT) within fourteen (14) calendar days of service of the order. Council will ensure that reference to this right of review will form part of the order document. This will include details of how an appeal must be lodged with the Council.

Non-compliance with an order

If an order is not complied with within the time fixed for compliance (or if there is an application for review, within fourteen (14) calendar days from the determination of the review) Council may (subject to the outcome of any review) take the action required by the order.

The reasonable costs and expenses incurred by Council in taking this action may be recovered by Council as a debt from the person who failed to comply with the requirements of the order.

Where an amount is recoverable by Council, Council may, in accordance with Section 257(5) of the Act, by notice in writing to the person fix a period, being not less than

twenty eight (28) days from the date of the notice, within which the amount must be paid. If the amount is not paid by the person within that period, the person is liable to pay interest on the outstanding amount. Council may impose a charge over the land for the unpaid amount, together with interest.

Non-compliance with an order of Council is an offence under the Act for which a person may incur a statutory penalty.

This policy does not apply to

Local nuisances and littering offences (other than those found in the *Local Government Act 1999 (SA)*) are contained in the *Local Nuisance and Litter Control Act 2016 (SA)*. Nuisance and littering enforcement fall within the jurisdiction of the *Local Nuisance and Litter Control Act 2016 (SA)* and will be dealt with in accordance with the procedures set out in that Act.

OTHER USEFUL DOCUMENTS

Relevant legislation

- *Local Government Act 1999 (SA)*
- *Local Nuisance and Litter Control Act 2016 (SA)*

Related documents

- City Safety Compliance and Enforcement Policy
- City Safety Compliance and Enforcement Guideline

GLOSSARY

Throughout this document, the below terms have been used and are defined as:

Authorised Person: a person appointed by a Council as an authorised person.

Expiation fee: amount payable as set by the relevant legislation which, once paid to the Council, will expiate an alleged offence.

Order: a binding directive from an Authorised Person of the Council to another party, requiring action of the cessation of an activity of some sort, to rectify an alleged breach of an Act, or to improve amenity or functionality of an area.

Notice in writing means written notice given:

- personally
- by leaving it at the last residential or business address of the person known to the serving authority (including, in the case of a corporation, the registered address of the corporation)
- by post addressed to the person at the last residential or business address of the person known to the serving authority (including, in the case of a corporation, the registered address of the corporation)
- by leaving it in the letter box to which the document could be sent
- by a means indicated by the person as being an available means of service
- if the document is to be served on a person as the owner of land, the land is unoccupied, and the identity or address of the owner is unknown to the Council — by placing the document on a conspicuous part of the land.

ADMINISTRATIVE

As part of Council's commitment to deliver the City of Adelaide Strategic Plan, services to the community and the provision of transparent information, all policy documents are reviewed as per legislative requirements or when there is no such provision a risk assessment approach is taken to guide the review timeframe.

This Policy document will be reviewed every **3** years unless legislative or operational change occurs beforehand. The next review is required in **2027.**

Review history:

Trim Reference	Authorising Body	Date/ Decision ID	Description of Edits
ACC2023/155002	Council	12 November 2024	Minor amendments to reflect current structure and legislation, typographical edits
ACC2019/42036	Council	19557 13 August 2019	Full review to include changes to *Local Government Act 1999* order making provisions and the introduction of the Local *Nuisance and Litter Control Act 2016*
ACC2003/1221	Strategy & Policy Committee	5 August 2002	First version

Contact:

For further information contact the Regulatory Services Program

City of Adelaide

25 Pirie Street, ADELAIDE, SA

GPO Box 2252 ADELAIDE SA 5001

+61 8 8203 7203

city@cityofadelaide.com.au

Attachment A

Excerpts from *The Local Government Act 1999 (SA)* relevant to this Policy:

Section 254—Power to make orders

(1) *A Council may order a person to do or to refrain from doing a thing specified in Column 1 of the following table if in the opinion of the Council the circumstances specified opposite it in Column 2 of the table exist and the person comes within the description opposite it in Column 3 of the table.*

Column 1	***Column 2***	***Column 3***
To do or to refrain from doing what?	***In what circumstances?***	***To whom?***
1. Unsightly condition of land *Refer to Local Nuisance and Litter Control Act 2016*		
2. Hazards on lands adjoining a public place		
(1) To fence, empty, drain, fill or cover land (including land on which there is a building or other structure).	*(1) A hazard exists that is, or is likely to become, a danger to the public.*	*(1) The owner or occupier of the land.*
(2) To remove overgrown vegetation, cut back overhanging branches, or to remove a tree.	*(2) The vegetation, branches or tree create, or are likely to create, danger or difficulty to persons using a public place.*	*(2) The owner or occupier of the land.*
(3) To remove or modify a flag or banner, a flagpole or sign, or similar object or structure that intrudes into a public place.	*(3) The relevant object or structure creates, or is likely to create, danger or difficulty to persons using a public place.*	*(3) The owner or occupier of the land.*
(4) Where the public place is a road—to take action necessary to protect the road or to remove a hazard to road users.	*(4) A situation exists that is causing, or is likely to cause, damage to the road or a hazard to road users.*	*(4) The owner or occupier of the land.*
Examples— · *To fill an excavation, or to prevent drainage of water across the road.*		

Column 1	***Column 2***	***Column 3***
To do or to refrain from doing what?	***In what circumstances?***	***To whom?***
· *To construct a retaining wall or to remove or modify a fence.* · *To fence land to prevent the escape of animals.* · *To remove a structure or vegetation near an intersection.*		
3. Animals that may cause a nuisance or hazard *Refer to Local Nuisance and Litter Control Act 2016*		
4. Inappropriate use of vehicle		
To refrain from using a caravan or vehicle as a place of habitation.	*A person is using a caravan or vehicle as a place of habitation in circumstances that—* *(a) present a risk to the health or safety of an occupant; or* *(b) cause a threat of damage to the environment; or* *(c) detract significantly from the amenity of the locality.*	*The owner or occupier of the land or a person apparently occupying the caravan or vehicle.*

(2) A reference in the table to an animal or animals includes birds and insects.

Section 216—Power to order owner of private road to carry out specified roadwork

(1) A Council may, by order in writing to the owner of a private road, require the owner to carry out specified roadwork to repair or improve the road.

(2) Divisions 2 and 3 of Part 2 of Chapter 12 apply with respect to—

(a) any proposal to make an order; and

(b) if an order is made, any order, under subsection (1).

Section 217—Power to order owner of infrastructure on road to carry out specified maintenance or repair work

(1) A Council may, by order in writing to the owner of a structure or equipment (including pipes, wires, cables, fittings and other objects) installed in, on, across, under or over a road, require the owner—

(a) to carry out specified work by way of maintenance or repair; or

(b) to move the structure or equipment in order to allow the Council to carry out roadwork.

(2) If the order is not complied with within a reasonable time fixed in the order—

(a) the Council may itself take the action required by the order and recover the cost of doing so as a debt from the owner; and

(b) the owner is guilty of an offence and liable to a penalty not exceeding $5 000.

(3) Subsection (1) and (2) do not apply to the owner of electricity infrastructure, public lighting infrastructure or gas infrastructure if the Commission has determined, on application by the owner, that there are reasonable grounds for not requiring the owner to take the action specified in the order.

(4) In this section—

***Commission** means the Essential Services Commission established under* the Essential Services Commission Act 2002;

***electricity infrastructure** has the same meaning as in the* Electricity Act 1996*;*

***gas infrastructure** has the same meaning as in the Gas Act 1997, but does not include a transmission pipeline within the meaning of the* Petroleum Act 2000;

***owner** of a structure or equipment includes a lessee or licensee;*

***public lighting infrastructure** has the same meaning as in the* Electricity Corporations (Restructuring and Disposal) Act 1999.

218—Power to require owner of adjoining land to carry out specified work

(1) A Council may, by order in writing to the owner of land adjoining a road, require the owner to carry out specified work to construct, remove or repair a crossing place from the road to the land.

(2) Divisions 2 and 3 of Part 2 of Chapter 12 apply with respect to—

(a) any proposal to make an order; and

(b) if an order is made, any order, under subsection (1).

Section 262—Power of enforcement

1) If a person (the offender) engages in conduct that is a contravention of this Act or a by-law under this Act, an authorised person may order the offender—

(a) if the conduct is still continuing—to stop the conduct; and

(b) whether or not the conduct is still continuing—to take specified action to remedy the contravention.

CITY SAFETY COMPLIANCE AND ENFORCEMENT GUIDELINE

November 2024 *administrative*

PURPOSE

This guideline supports the City Safety Compliance and Enforcement Policy in providing a clear framework for approaching City of Adelaide's community safety compliance and enforcement activities in a fair, balanced and consistent manner.

The guideline encompasses Council's approach to both proactive monitoring activities and undertaking investigations into concerns raised by members of the public.

The intent of the guideline is to support the Council's Authorised Officers to exercise judgement and act in accordance with the legislation, taking into account their professional expertise and the unique circumstances of each case. The scope of this guideline reflects community safety functions across a large number of Acts, Regulations, Guidelines, Codes and Standards, including but not limited to:

- *Planning Development Infrastructure Act 2016*
- *Local Government Act 1999 (SA)*
- *Local Nuisance & Litter Control Act 2016 (SA)*
- *Public Health Act 2011*
- *Food Act 2001*
- National Construction Code
- Council By-Laws, Policies and Guidelines

This guideline does not address our approach to enforcing breaches relating to on-street parking.

PRINCIPLES

The intent of Council's approach to compliance and enforcement is to undertake our legislated and regulatory obligations with due diligence – and in doing so to keep the city safe, clean and accessible for all.

The City of Adelaide is committed to the following principles in all compliance and enforcement activities:

- Acting in accordance with the principles of natural justice and the rule of law.
- Deploying a risk-based prioritisation to the allocation of compliance and enforcement resources.
- Delivering a proportionate response to compliance matters, scaling our actions to the seriousness of a breach.

- Seeking voluntary compliance and using education first, undertaking formal action only when necessary and appropriate to do.
- Collecting, using and storing all investigative information and data sensitively and appropriately.
- Seeking inter-agency cooperation with other compliance and enforcement agencies at a Local, State and Federal level to achieve community outcomes.

TYPES OF ENFORCEMENT ACTION

Enforcement

Enforcement means a combination of advice together with possible actions that can be taken after a breach has been identified. Enforcement action may follow the investigation of a concern raised by the public or from proactive monitoring activities undertaken by City of Adelaide.

When determining appropriate means of enforcement, City of Adelaide will consider, amongst other relevant factors:

- the seriousness of the offence
- the consequences of continued non-compliance
- the degree of wilfulness involved
- the offender's history
- individual circumstances (facts of the matter)
- the likely effectiveness of the various enforcement options
- consistency of approach to similar breaches/offences.

Factors not considered include:

- the alleged person's ethnicity, nationality, political association, age, religion, appearance, gender, physical or mental ability, sexuality or beliefs
- personal or professional associations with the alleged offender or any other person involved.

No Action

While all requests will be considered, there may be occasions when it is appropriate to take no action. This includes circumstances such as:

- the alleged offence is outside City of Adelaide's jurisdiction or considered trivial
- upon investigation, breaches are not found
- taking action may prejudice larger considerations or outcomes
- insufficient facts/evidence/information exist to determine that an offence has been committed or that the responsible person/business can be identified
- when considering best use of resources, there are higher priorities to deliver.

Informal Action

Informal action is the most common response to minor or first-time alleged offences and is often effective in efficiently achieving compliance. This may include:

- offering verbal or written advice
- education through meetings, references to websites/material or on-site meetings
- verbal warnings and requests for action
- written warnings
- mediation.

The circumstances in which informal action may be appropriate include:

- the breach is not serious enough to warrant formal action
- the consequences of non-compliance will not pose a significant risk
- past history reasonably suggests that informal action will achieve compliance
- confidence in the ability and willingness to achieve compliance is high.

Statutory Notices, Orders or Actions in Default

Statutory Notices, Orders or Actions in Default are formal instruments governed by Council's Order Making Policy that will be issued when required and/or when the matter cannot be resolved through informal action. There are a wide range of such instruments available, and their use will be in accordance with the relevant legislation, the Policy, and individual authorisations.

Statutory Notices/Orders generally require actions to be carried out by the offending party in a specific timeframe, or that activities must be modified/ceased. Should this not occur, legal action of further escalated penalties will usually apply.

Issuing a Statutory Notice/Order requires a certain threshold of admissible evidence to be obtained. In most cases, anyone receiving a Statutory Notice can appeal to the appropriate Court.

Expiation Notices

Expiation Notices attract a legislated fee to be paid due to the breach identified. Expiations can be issued at the same time as a Statutory Notice/Order or independently. This form of enforcement action may be appropriate in the following circumstances:

- failure to correct an identified problem or the requirements of a Statutory Notice or Order having been given a reasonable opportunity to do so
- severity of the breach identified and the risk to public safety
- failure to comply with a specific regulation or requirement
- confidence of the Authorised Officer of the ability to achieve compliance without an Expiation being issued.

To issue an Expiation there must be substantial, reliable, and admissible evidence that an identifiable person or business has committed the alleged offence. Anyone receiving an Expiation is entitled to elect to be prosecuted for the alleged offence.

Prosecution

Prosecutions and legal proceedings will rarely be used to respond to minor breaches. Prosecution will only proceed where there is a reasonable prospect of a conviction being secured, and other enforcement options have been exhausted.

The following circumstances may warrant consideration for prosecution:

- a flagrant breach(es) of the law such that the health, safety, and welfare of members of the public have been put at risk
- a failure to correct an identified serious problem having been given a reasonable opportunity to do so
- a history of repeat behaviour and/or similar offences
- an unwillingness to prevent a recurrence of the problem.

Before prosecution proceedings are initiated, there must be substantial, reliable, and admissible evidence that an identifiable person or business has committed an offence.

Prosecutions often incur large costs and require a significant investment of time and resources. This can involve City of Adelaide resources, and other parties involved or impacted by the alleged offence. As such, a decision to prosecute must be in the public interest. In considering whether prosecution is in the public interest, the following factors are considered:

- whether the offence was deliberate or premeditated
- the need to influence the offender's future behaviour
- the availability and efficacy of any alternatives to prosecution
- the prevalence of the alleged offence and the need for deterrence
- the likely length and expense of a trial.

PRIORITISATION FRAMEWORK

The Prioritisation Framework, provided in Attachment A, is provided for the purpose of community transparency in how compliance resources are deployed.

The framework is a guide and does not encompass all possible requests, nor does it detract from City of Adelaide using discretion in responding to individual circumstances and context-specific issues, which may differ from the framework.

Prioritisation is undertaken based on considerations of the requirements of each piece of legislation, in addition to a risk assessment of the broad categories of activities listed.

OTHER USEFUL DOCUMENTS

Related documents

- City Safety Compliance and Enforcement Policy
- Corporate Complaint Handling Operating Guideline
- Council Member Behavioural Support Policy
- Council Member Staff interaction Policy
- Council By-laws and Guidelines
- Order Making Policy

Relevant legislation

- *Planning Development Infrastructure Act 2016*
- *Local Government Act 1999 (SA)*
- *Local Nuisance & Litter Control Act 2016 (SA)*
- *Public Health Act 2011*
- *Food Act 2001*
- *National Construction Code*

GLOSSARY

Throughout this document, the below terms have been used and are defined as:

procedural fairness: procedures used by a decision-maker requiring a fair and proper process be used when making a decision. A decision-maker who follows a fair procedure is more likely to reach a fair and correct decision.

natural justice: basic or fundamental judicial rights extended to a person involved in a dispute. Proceedings should be unbiased and undertaken in good faith, and each party should have equal access and should be aware of the facts.

Authorised Officer: a person appointed by a council as an authorised person.

public realm: areas of the City of Adelaide which are publicly accessible and not privately owned.

ADMINISTRATIVE

As part of Council's commitment to deliver the City of Adelaide Strategic Plan, services to the community and the provision of transparent information, all policy documents are reviewed as per legislative requirements or when there is no such provision a risk assessment approach is taken to guide the review timeframe.

This Guideline will be reviewed every **3** years unless legislative or operational change occurs beforehand. The next review is required in **2027.**

Review history:

Trim Reference	Authorising Body	Date/ Decision ID	Description of Edits
ACC2024/98716	*Associate Director Regulatory Services*	*12 November 2024*	*Amended to provide clarity in relation to compliance and enforcement approach*
ACC2021/182239	*CEO*	*12 April 2022*	*Minor amendments made to illustrate a change in organisation structure*
ACC2019/15637	*ELT*	*20 February 2020*	*Full review and amendments made to include all enforcement processes*

Contact:

For further information contact the Regulatory Services Program

City of Adelaide

25 Pirie Street, Adelaide, SA

GPO Box 2252 ADELAIDE SA 5001

+61 8 8203 7203

city@cityofadelaide.com.au

Attachment A: City Safety Compliance and Enforcement Prioritisation Framework

The framework supports Council's City Safety Compliance and Enforcement Guideline in outlining the risk and prioritisation approach under core pieces of legislation. The framework provides community transparency in how resources are deployed.

The framework provides a guide for prioritisation of response and does not encompass all possible requests, nor does it detract from City of Adelaide exercising judgement to respond to individual circumstances and context-specific issues as required.

	Community Safety (e.g. *Local Govt Act; Local Nuisance and Litter Control Act*, permits, by-laws etc**)**	**Environmental Health** (e.g. *Public Health Act, Food Act, PDI Act)*	**Development Compliance** (e.g. *PDI Act*, National Construction Code, by-laws)
Priority Category	**Example activities/matters included within each priority category**	**Example activities/matters included within each priority category**	**Example activities/matters included within each priority category**
Priority 1	Dog attacks Wandering dogs (Dangerous and or menacing) Public realm hazards (major) Illegal dumping and litter (hazardous litter) as outlined in Section 22(5) *Local Nuisance and Litter Control Act* 2016	Monitoring of Food Safety audits for businesses serving high-risk foods to vulnerable populations Provision of public immunisation services Annual inspection regime of cooling towers and warm water systems Inspection and monitoring of food businesses in line with SA Health risk classification and associated frequency	Dangerous/hazardous structures Unauthorised works/land uses with potential life safety impacts Building fire safety defects Swimming pool safety defects Unauthorised works to heritage places Excavation near listed or significant trees
Priority 2	Local nuisances: Noise, dust, odour, smoke, vibration Wandering dogs (Not dangerous, and or menacing) Barking dogs	Inspection and monitoring of tattoo parlours and body piercing studios Inspection and monitoring of public swimming pools and spas (water quality) Inspection and monitoring of wastewater and contaminated land	Annual legislated building inspection regime: • 66% of Class 1 buildings • 90% of Class 2-9 buildings • 100% of swimming pools Class 10 buildings – complaint based

	Illegal dumping and litter (non-hazardous litter and general litter) Vacant blocks (fire prevention)	Customer requests based on risk to public safety (e.g. instances of communicable disease, reported insanitary conditions etc.)	Unnotified, but approved, development Maintenance of Essential Safety Provisions Scheduled Building Fire Safety inspections Unauthorised land use/building work – no life safety risks present Condition audits of Heritage Buildings Squatter activity
Priority 3	Problem owned/unowned cats Public realm hazards (minor) Bins on street Unattractive laneways Non-compliant busking, smoking, use of wheeled recreation devices Non-compliant outdoor dining areas/ moveable signs	Non-commercial insanitary condition e.g. severe domestic squalor Supported residential facilities Education and health promotion (general)	Compliance with Development Approvals – no life safety risk present Development condition compliance audits Lodging House licence audits Proactive Joint Task Force inspections Compliance for temporary events/structures Proactive audits of fire safety/ accessibility
Priority 4		Hoarding and squalor (not severe) Vermin reports in commercial/private premises Hairdressers	Neighbour fencing disputes Private stormwater runoff Encroachments on private land Requests regarding non-life safety issues e.g. information requests, Certificates of Occupancy, building classifications etc.

Catalyst Site Policy Review Framework and Principles

Strategic Alignment - Our Places

Public

Tuesday, 5 November 2024

City Planning, Development and Business Affairs Committee

Program Contact:
Sarah Gilmour, Associate Director Park Lands, Policy & Sustainability

Approving Officer:
Ilia Houridis, Director City Shaping

EXECUTIVE SUMMARY

The purpose of this report is for Council to note the steps taken in response to Council's August 2023 decision to review catalyst site policy and to seek endorsement of principles and a framework for collaborating with the State Government to review existing catalyst site policy in the State Government's Planning and Design Code (the Code).

The report provides a review of the existing catalyst site policy as requested by Council in August 2023, as follows:

> *That Administration bring forward a review of catalyst site policy and seek State Government support for a Code Amendment in the 2023/24 financial year to enact Council's decision on 31 January 2023 that catalyst sites "should not be permitted within or adjacent to residential areas, including from main streets or business zones within the wider residential locality."*

Catalyst sites are sites of 1500m^2 with a different set of rules than other sites in the same zone. The aim of catalyst sites, when they were introduced into the Development Plan, was to achieve greater density and increase housing outcomes due to the ability to build taller buildings than the surrounding zone. The catalyst site policy is considered to be lacking in policy that addresses the interface with surrounding development.

Administration has been advocating since January 2023 for a review of catalyst site policy and had completed a review of catalyst site policy for consideration by Council in April 2024. This coincided with the release of the Expert Panel on Planning Reform recommendation that the State Planning Commission should review the size and purpose of catalyst sites and that there is the opportunity to prescribe additional criteria for the creation of catalyst sites.

The draft Greater Adelaide Regional Plan (GARP) identifies the city as an area of "State-Significant Infill" and as such is looking at ways to facilitate growth including an action to increase building heights in the CBD. The draft submission to the Greater Adelaide Regional Plan (refer to separate 5 November agenda item) reinforces the position of Council and Administration that catalyst site policy needs to be reviewed to be effective in stimulating housing growth while managing impacts on surrounding development.

Administration has actively sought to collaborate with the State Government since April 2024 and through this report is seeking direction from Council on the principles and framework to pursue a State-led Code Amendment or a Council-led Code Amendment.

City of Adelaide's City Plan and Housing Strategy identify that subject to appropriate policy to control the interface, larger or amalgamated sites provide an opportunity to achieve the planned city growth with fewer impacts on surrounding development. The principles and framework (**Attachment A**) have been developed with reference to the City of Adelaide's submission to the State Government's Planning System Implementation Review and align with the City of Adelaide's Strategic Plan, City Plan – Adelaide 2036 (Link 1), and Housing Strategy – Investing in Our Housing Future.

The proposed principles are:

- Recognise that the City of Adelaide and the State Government through its Expert Panel Review on the Planning System Implementation agree changes are required to the criteria and framework for catalyst site policy.
- Review the definition of a catalyst site in the Code to ensure that it reflects the appropriate minimum site area (and any other relevant parameters) for the policies to apply.

- Revise the policy framework for larger sites with stronger policy and design criteria that is consistent with the objects of the *Planning, Development and Infrastructure Act 2016* (SA), and aligns with creating an effective, efficient and enabling planning system.
- Develop replacement policy based on criteria to manage building height and interfaces, which could support development at higher intensity in appropriate locations in the city and North Adelaide.
- The replacement policy to consider site area, building height opportunities (and possible cap on height limit), stronger interface/design and local context requirements, density/site coverage, and other relevant measures such as higher standards of public realm and/or street activation.
- Recognise that larger sites provide opportunity for significant integrated development to occur which meets the growth targets in the Greater Adelaide Regional Plan and the City of Adelaide's Strategic Plan, City Plan – Adelaide 2036, and Housing Strategy – Investing in our Housing Future.

This report and ongoing activity to revise catalyst site policy form part of the City of Adelaide's Code Amendment program. In 2024/25 the Code Amendment program includes a review of Historic Area Statements, Adult Entertainment Premises and Adult Products and Services Premises, Local Heritage investigations, and Waste Management investigations being led by the City of Adelaide.

The Code Amendment Program also includes responding to Code Amendments that will have an impact on the CoA led by the State Government and external parties such as the Accommodation Diversity Code Amendment, Future Living Code Amendment, Ancillary Accommodation and Student Accommodation Definitions Review Code Amendment, Festival Plaza Code Amendment, Glenside Urban Corridor (Living) Code Amendment, and 107 Port Road Thebarton (Thebarton Brewery Precinct) Code Amendment.

RECOMMENDATION

The following recommendation will be presented to Council on 12 November 2024 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the principles and framework as contained in Attachment A to Item 7.7 on the Agenda of the City Planning, Development and Business Affairs Committee held on 5 November 2024, for the purposes of collaborating with the State Government to progress a review of catalyst site policy.
2. Notes the outcomes of the review of catalyst site policy in the State Government's Planning and Design Code as presented in Item 7.7 on the Agenda of the City Planning, Development and Business Affairs Committee held on 5 November 2024.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Places Encourage bold, interesting and purposeful development that supports the changing needs of our community and city.
Policy	The review of catalyst site policies has been taken in alignment with Council's commitments in *City Plan – Adelaide 2036*, the Housing Strategy – *Investing in our Housing Future*, as well as Council's submissions to the Expert Panel on the Planning System Implementation Review and the State Planning Commission on the Greater Adelaide Regional Plan Discussion Paper.
Consultation	Any future changes proposed through a Code Amendment will be required to undergo public consultation.
Resource	Not as a result of this report
Risk / Legal / Legislative	Not as a result of this report
Opportunities	To improve the planning policy contained in the State-wide Planning and Design Code relating to built form and development outcomes in the City of Adelaide, including greater certainty for residents and development proponents regarding development on larger or amalgamated sites.
24/25 Budget Allocation	The City of Adelaide Annual Business Plan and Budget includes $240,000 for delivering the Code Amendment Program.
Proposed 25/26 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	Changes to planning policy in the Planning and Design Code is through a Code Amendment.
24/25 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	Not as a result of this report

DISCUSSION

Background

1. The City of Adelaide's submission to the Planning System Implementation Review (PSIR) in January 2023 identified that policy improvements are needed to address community concerns about catalyst site policy.

2. At its meeting on 8 August 2023 Council resolved:

   That Administration bring forward a review of catalyst site policy and seek State Government support for a Code Amendment in the 2023/24 financial year to enact Council's decision on 31 January 2023 that catalyst sites "should not be permitted within or adjacent to residential areas, including from main streets or business zones within the wider residential locality."

3. Since the Council decision in August 2023, the following advocacy, investigations and opportunities relevant to catalyst site policies have been undertaken:

   3.1. November 2023 - the City of Adelaide's submission on the Greater Adelaide Regional Plan Discussion paper reiterated the request for catalyst policy review and identified the Council's intention to progress a Code Amendment to amend catalyst site policy.

   3.2. February 2024 - Council endorsed its Housing Strategy – Investing in our Housing Future, that seeks to improve catalyst site policy, review building height limits and implement policies that allow for alternative housing models.

   3.3. March 2024 – the State Government released the Expert Panel's report and its response (Link 2). The State Government supported the Expert Panel's recommendation that the State Planning Commission should review the size and purpose of catalyst sites and that there is opportunity to prescribe additional criteria for the creation of catalyst sites. This could include, but is not limited to, considering the merits of:

      3.3.1. Applying additional incentive policy through both planning and non-planning mechanisms to encourage the creation of catalyst sites.

      3.3.2. Including additional design parameters and/or expectations to ensure catalyst sites satisfactorily transition into the urban landscape.

      3.3.3. Requiring the provision of a structure plan for catalyst sites to bring the community into the conversation at the policy level before approvals are sought and obtained.

      3.3.4. Requiring an outline consent to be obtained for catalyst sites (acknowledging the need for a Practice Direction to be prepared in accordance with section 120 of the PDI Act) to give both the applicant and community certainty.

      3.3.5. Preparing additional guidance material pertaining to catalyst sites and what is and is not capable of being deemed catalytic.

      3.3.6. Providing for appeal rights in certain circumstances.

   3.4. April 2024 – a Catalyst Site Policy Review Options Report was prepared for the April 2024 City Planning, Development and Business Affairs Committee Meeting. The report item was withdrawn following release of the Expert Panel Recommendations on the State Planning System Implementation Review and the State Government's response which supports working with the City of Adelaide to review catalyst site policy.

   3.5. May 2024 – an overview of the State Government's response to the Expert Panel's report and alignment with the City of Adelaide's submission was presented to the City Planning, Development and Business Affairs Committee in May 2024 (Link 3).

   3.6. June 2024 – the Administration wrote to the State Planning Commission seeking to collaborate with the State Planning Commission as a matter of priority on the commencement of the catalyst policy review. To date no response has been received.

   3.7. September 2024 – Council endorsed its City Plan – Adelaide 2036 which identifies a review of catalyst site policy and sets principles for height and overall city form (Strategy 7 – New Housing Models and Strategy 8 – Designing for Urban Life, Diversity and Density).

   3.8. September 2024 - the State Government released the implementation program for the Expert Panel's recommendations that indicates that the Greater Adelaide Regional Plan (GARP) would provide direction for the City of Adelaide on catalyst site policy review.

3.9. October 2024 – the State Government released the draft GARP which is silent on a review of catalyst site policy. The City of Adelaide's submission to the draft GARP is a separate report item in the City Planning, Development and Business Affairs Committee Agenda for 5 November 2024.

Existing Catalyst Site Policy

4. The State Government definition of catalyst sites in the Planning and Design Code (the Code) is as below:

   Catalyst site: Means a site greater than 1500m^2, which may include one or more allotments.

5. Development applications on sites that meet this definition (within the subzones identified in Figure 1 below) are exempt from the building height limits that would otherwise be applicable.

6. Within the affected subzones, some policies seek proposed developments on catalyst sites to be designed to manage the interface with existing lower rise residential amenity, however these policies are very limited.

7. Catalyst site policies only apply in the following locations within the City of Adelaide, as shown in Figure 1:

   7.1. Melbourne Street West Subzone (Business Neighbourhood Zone)

   7.2. East Terrace Subzone (City Living Zone)

   7.3. City High Street Subzone (City Main Street Zone)

   7.4. Community Facilities Zone (St Andrews Hospital Precinct Subzone).

8. Other than parts of the City High Street Subzone in Sturt Street and Wright Street, catalyst site policy mainly applies in Subzones within or adjacent to residential areas in the City Living Zone, as shown in Figure 1.

9. Catalyst site policies do not prescribe limits to building heights, other than in the Melbourne Street West Subzone which has a building height limit of 6 storeys for catalyst sites (development is limited to 14 metres [approximately 4 storeys] for the balance of the Subzone).

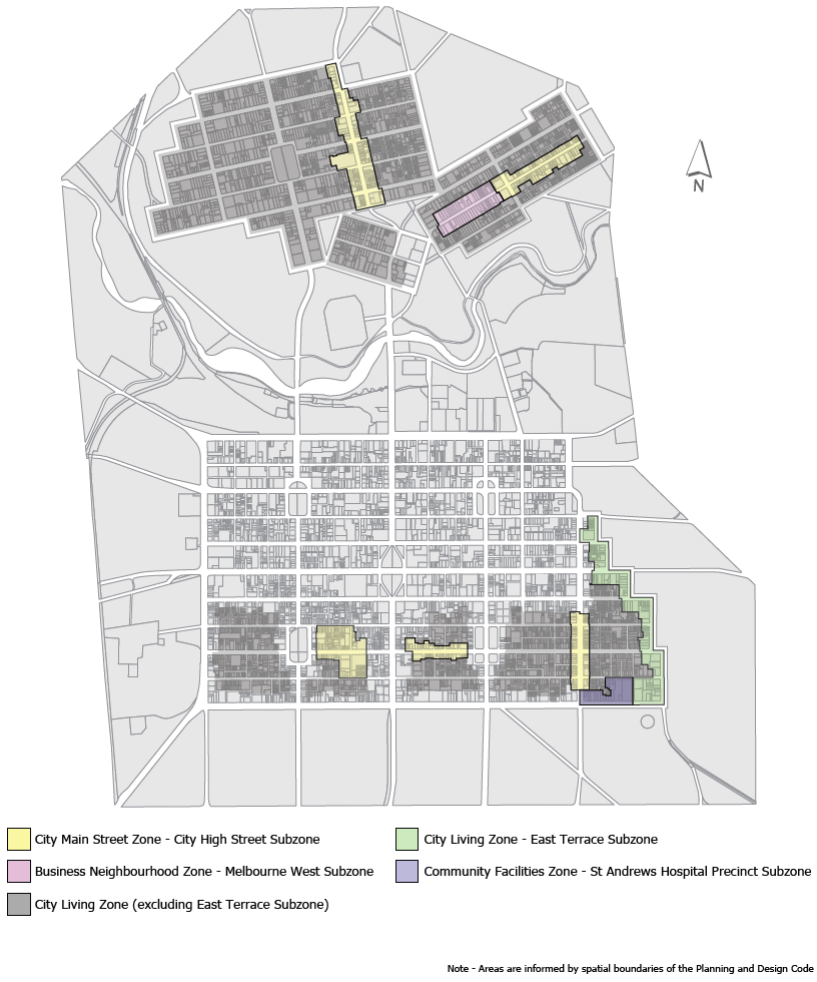


Figure 1: Subzones in the City of Adelaide with catalyst site policies

10. Across the Subzones, there are approximately 44 allotments that are greater than 1,500m^2 including seven sites with State Heritage Places and one with a Local Heritage Place. This number does not account for the potential amalgamation of allotments to facilitate the use of the catalyst site policy.

Catalyst Site Policy Review

11. Owing to their large site area, catalyst sites provide opportunity for significant integrated development to occur. The intent of catalyst sites is to ensure land available in appropriate locations is not underutilised and underdeveloped, allow for residential development in concert with small scale commercial development and incentivise amalgamation and master planning of larger development sites.

    11.1. The above objectives for development of larger sites are consistent with the objectives in the City of Adelaide's Strategic Plan, City Plan – Adelaide 2036 and Housing Strategy – Investing in our Housing Future.

12. The premise of catalyst site policy was that the building design, setback and interface of higher scale development allowed by the dispensation to maximum height could be appropriately managed using the large area of the site.

    12.1. In practice, this approach needs a suite of supporting policies to guide building design and interface management to ensure that development on larger or amalgamated sites delivers the desired growth outcomes without adverse impacts on existing streetscape character.

13. Whilst catalyst site policy is unique in the City of Adelaide, there is a similar mechanism for 'significant development sites' in inner metropolitan local government areas.

    13.1. Compared with catalyst site policy, policy in inner metropolitan Adelaide includes additional prescribed criteria, such as site area, adaptive reuse, design quality, private open space provision, provision of community services, affordable housing or sustainability measures, that are assessed in determining additional building height allowance (and include a cap on additional height).

14. Across Australian cities there are varied policy mechanisms that provide flexibility to facilitate appropriate development outcomes on larger sites. Consideration of the local context is given to ensure interface management, building design, housing and land use outcomes, and community benefit is assessed.

15. The key findings of the review are:

    15.1. Effective policy for large and/or amalgamated sites requires appropriate supporting policies to guide urban design and interface management issues such as local character, overlooking and overshadowing.

    15.2. Removing the mechanism to incentivise larger sites within or adjacent to residential areas in the Code altogether, may limit opportunities for additional housing supply and innovative design outcomes that align with the City of Adelaide's Strategic Plan, City Plan, and Housing Strategy.

    15.3. Amendment of the Code is warranted to give effect to policy for larger sites in a manner that protects the interface with existing built form and is cognisant of the local context.

Catalyst Site Policy Review Framework and Principles

16. Attachment A contains a framework and principles for collaborating with the State Government to review existing catalyst site policy. The principles are:

    16.1. Recognise that the City of Adelaide and the State Government through its Expert Panel Review on the Planning System Implementation agree changes are required to the criteria and framework for catalyst site policy.

    16.2. Review the definition of a catalyst site in the Code to ensure that it reflects the appropriate minimum site area (and any other relevant parameters) for the policies to apply.

    16.3. Revise the policy framework for larger sites with stronger policy and design criteria that is consistent with the objects of the *Planning, Development and Infrastructure Act 2016* (SA), and aligns with creating an effective, efficient and enabling planning system.

    16.4. Develop replacement policy based on criteria to manage building height and interfaces, which could support development at higher intensity in appropriate locations in the city and North Adelaide.

    16.5. The replacement policy to consider site area, building height opportunities (and possible cap on height limit), stronger interface/design and local context requirements, density/site coverage, and other relevant measures such as higher standards of public realm and/or street activation.

16.6. Recognise that larger sites provide opportunity for significant integrated development to occur which meets the growth targets in the Greater Adelaide Regional Plan and the City of Adelaide's Strategic Plan, City Plan – Adelaide 2036, and Housing Strategy – Investing in our Housing Future.

17. The replacement policy framework aligns with the City Plan – Adelaide 2036

17.1. Strategy 7 of the City Plan highlights Council's ambition to facilitate growth of housing supply in the city through methods including development of large, underutilised sites which are suitable for potential amalgamation and master planning and advocating for development in strategic locations.

17.1.1. A policy framework guiding development on large sites directly aligns with this strategy and will assist in achieving the objectives of the City Plan.

17.2. Strategy 8 of the City Plan articulates the built form principles for enabling growth outcomes in the city while considering local context and place.

17.2.1. A replacement policy framework will assist in strengthening the consideration of built form and interface while achieving desired growth outcomes.

Next Steps

18. Administration will continue discussions with the State Planning Commission and Planning and Land Use Services on progressing the implementation of the Expert Panel recommendation to review catalyst sites.

19. Discussion will be based around the policy framework and principles identified in City Plan – Adelaide 2036, as outlined in **Attachment A**.

20. Pending discussions with the State Government, the City of Adelaide is seeking to initiate a proposal to amend the Code in 2025 to commence within the current 2024/25 financial year.

DATA AND SUPPORTING INFORMATION

Link 1 – City Plan – Adelaide 2036

Link 2 – Response of the South Australian Government to the Expert Panel Recommendations

Link 3 – Agenda - City Planning, Development and Business Affairs Committee - Tuesday, 7 May 2024

ATTACHMENTS

Attachment A – Framework and principles for discussion with State Planning Commission and Planning and Land Use Services.

- END OF REPORT -

Attachment A

Catalyst Site Policy Review Framework and Principles

Principles for collaborating with the State Government to review existing catalyst site policy

- Recognise that the City of Adelaide and the State Government through its Expert Panel Review on the Planning System Implementation agree changes are required to the criteria and framework for catalyst site policy.
- Review the definition of a catalyst site in the Code to ensure that it reflects the appropriate minimum site area (and any other relevant parameters) for the policies to apply.
- Revise the policy framework for larger sites with stronger policy and design criteria that is consistent with the objects of the *Planning, Development and Infrastructure Act 2016* (SA), and aligns with creating an effective, efficient and enabling planning system.
- Develop replacement policy based on criteria to manage building height and interfaces, which could support development at higher intensity in appropriate locations in the city and North Adelaide.
- The replacement policy to consider site area, building height opportunities (and possible cap on height limit), stronger interface/design and local context requirements, density/site coverage, and other relevant measures such as higher standards of public realm and/or street activation.
- Recognise that larger sites provide opportunity for significant integrated development to occur which meets the growth targets in the Greater Adelaide Regional Plan and the City of Adelaide's Strategic Plan, City Plan – Adelaide 2036, and Housing Strategy – Investing in our Housing Future.

Framework to be guided by the City Plan – Adelaide 2036

Strategies 7 and 8 (in particular) of the City Plan highlight Council's ambitions and intentions to facilitate improvements to the Planning and Design Code, including the following specific actions relevant to good design outcomes and interface management:

- Lead changes to the Planning and Design Code to facilitate development that prioritises good design outcomes and improves the relationship between buildings and public spaces and the interface with neighbours, particularly for strategic sites and places.
- Lead changes to the Planning and Design Code to facilitate development at the interface between higher built form with more traditional low-rise built forms, including through the management of streetscape character, access to natural light, visual and acoustic privacy, massing and proportions.

Strategy 7 – New Housing Models

City Plan Strategy 7 outlines an objective to facilitate the introduction of new housing models and the conversion of underutilised sites and buildings for housing to accommodate residential growth.

The City Plan identifies underutilised areas and high-potential strategic sites throughout the city which can contribute to city-wide place outcomes. These sites include large and underutilised sites such as open lot car parks, warehouses, and expansive vacant allotments which are suitable for potential amalgamation and master planning.

A revised catalyst site policy framework is required to guide development in line with the objectives of Strategy 7. The investigation seeks to develop policy that assists in achieving the following strategies:

- 7.4 - Advocate for growth in areas connected to and integrated with, existing and proposed public transport routes, infrastructure, and services (SPP 5.1).
- 7.5 - Advocate for mixed use development around activity centres, public transport nodes and strategic transport corridors to encourage greater use of active transport options such as walking, cycling and public transport (SPP 1.8 & 1.9).
- 7.7 - Partner on changes to the Planning and Design Code to facilitate development that implements the policies of State Planning Policy 2 – Design Quality.
- 7.8 - Facilitate recognition of the unique character of areas by identifying their valued physical attributes in consultation with communities (SPP 2.8).
- 7.10 - Lead changes to the Planning and Design Code to facilitate development that improves the relationship between buildings and public spaces and the interface with neighbours (SPP 2.12).
- 7.14 - Facilitate opportunities for innovative design and housing form in strategic locations through amendments to planning policy in the Planning and Design Code (SPP 2.7).

Strategy 8 – Designing for Urban Life, Diversity and Density

City Plan Strategy 8 outlines an objective to consider local context and place for the built form that enables growth outcomes. This strategy aims to guide future development outcomes and protect existing character by managing built form as well as the interface between development and the adjacent public realm and neighbouring sites.

A revised catalyst site policy framework will assist in strengthening the basis for consideration of built form and interface of development on larger sites in line with Strategy 8. The investigation seeks to develop policy that assists in achieving the following strategies:

- 8.3 - Facilitate recognition of the unique character of areas by identifying their valued physical and cultural attributes in consultation with communities (SPP 2.8).
- 8.4 - Lead changes to the Planning and Design Code to ensure development respects culturally and historically significant places and reflects the unique character of the local area (SPP 7.1).
- 8.8 - Lead changes to the Planning and Design Code to facilitate development that prioritises good design outcomes and improves the relationship between buildings and public spaces and the interface with neighbours, particularly for strategic sites and places (SPP 2.5 & 2.12).

- 8.9 - Lead changes to the Planning and Design Code to facilitate development at the interface between higher built form with more traditional low-rise built forms, including through the management of streetscape character, access to natural light, visual and acoustic privacy, massing and proportions (SPP 2.11)
- 8.13 - Reinforce the inner and outer built form edge of the Adelaide Park Lands terraces by encouraging quality medium to high-rise mixed use developments that increase the diversity of housing while also contributing to, and activating, the public realm.
- 8.14 - Sustain the heritage, character and scale of valued residential precincts (including North Adelaide and the south-east and west corners) with contextually appropriate development that contributes to the needs of our growing population and provides services to the community.

Exclusion of the Public

Agenda Item 9

Tuesday, 5 November 2024

City Planning, Development and Business Affairs Committee

Program Contact:
Anthony Spartalis, Chief Operating Officer

Approving Officer:
Michael Sedgman, Chief Executive Officer

Public

EXECUTIVE SUMMARY

Section 90(2) of the *Local Government Act 1999 (SA)* (the Act), states that a Council may order that the public be excluded from attendance at a meeting if the Council considers it to be necessary and appropriate to act in a meeting closed to the public to receive, discuss or consider in confidence any information or matter listed in section 90(3) of the Act.

It is the recommendation of the Chief Executive Officer that the public be excluded from this City Planning, Development and Business Affairs Committee meeting for the consideration of information and matters contained in the Agenda.

For the following Reports for Recommendation to Council seeking consideration in confidence

10.1 Proposal to Initiate Waste Code Amendment [section 90(3) (m) of the Act]

10.2 City of Adelaide Property Strategy [section 90(3) (b) & (d) of the Act]

The Order to Exclude for Items 10.1 and 10.2:

1. Identifies the information and matters (grounds) from section 90(3) of the Act utilised to request consideration in confidence.
2. Identifies the basis – how the information falls within the grounds identified and why it is necessary and appropriate to act in a meeting closed to the public.
3. In addition, identifies for the following grounds – section 90(3) (b), (d) or (j) of the Act - how information open to the public would be contrary to the public interest.

ORDER TO EXCLUDE FOR ITEM 10.1

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE:

1. Having taken into account the relevant consideration contained in section 90(3) (m) and section 90(2) & (7) of the *Local Government Act 1999 (SA)*, this meeting of the City Planning, Development and Business Affairs Committee dated 5 November 2024 resolves that it is necessary and appropriate to act in a meeting closed to the public as the consideration of Item 10.1 [Proposal to Initiate Waste Code Amendment] listed on the Agenda in a meeting open to the public would on balance be contrary to the public interest.

   Grounds and Basis

   This Item is confidential as it contains information regarding the draft Code Amendment that is not appropriate to be made public prior to the commencement of public engagement, particularly due to the potentially sensitive nature of the draft Code Amendment

   The disclosure of information in this report could reasonably breach confidentiality of information prior to public engagement with the draft Code Amendment.

Public Interest

The Committee is satisfied that the principle that the meeting be conducted in a place open to the public has been outweighed in the circumstances because the disclosure of this information will release the draft Code Amendment prior to Council endorsement of the policy approach and public engagement plan.

2. Pursuant to section 90(2) of the *Local Government Act 1999 (SA)* (the Act), this meeting of the City Planning, Development and Business Affairs Committee dated 5 October 2024 orders that the public (with the exception of members of Corporation staff and any person permitted to remain) be excluded from this meeting to enable this meeting to receive, discuss or consider in confidence Item 10.1 [Proposal to Initiate Waste Code Amendment] listed in the Agenda, on the grounds that such item of business, contains information and matters of a kind referred to in section 90(3) (m) of the Act.

ORDER TO EXCLUDE FOR ITEM 10.2

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE:

1. Having taken into account the relevant consideration contained in section 90(3) (b) & (d) and section 90(2) & (7) of the *Local Government Act 1999 (SA)*, this meeting of the City Planning, Development and Business Affairs Committee dated 5 November 2024 resolves that it is necessary and appropriate to act in a meeting closed to the public as the consideration of Item 10.2 [City of Adelaide Property Strategy] listed on the Agenda in a meeting open to the public would on balance be contrary to the public interest.

   Grounds and Basis

   This Item contains certain information of a confidential nature (not being a trade secret) the disclosure of which could reasonably be expected to confer a commercial advantage on a person with whom the council is conducting business, prejudice the commercial position of the council and prejudice the commercial position of the person who supplied the information and confer a commercial advantage to a third party.

   More specifically, the disclosure of certain information in this report could reasonably prejudice the commercial position of the council including its future commercial dealings given that it contains financial information and further direction with regard to Council's assets and strategic holdings.

   Public Interest

   The Committee is satisfied that the principle that the meeting be conducted in a place open to the public has been outweighed in the circumstances given that the information in this report, including certain financial information and further direction, may prejudice its future commercial dealings with regard to its assets and strategic holdings. On this basis, the disclosure of such information may severely prejudice the City of Adelaide's ability to influence the proposal for the benefit of the City of Adelaide and the community in this matter.

2. Pursuant to section 90(2) of the *Local Government Act 1999 (SA)* (the Act), this meeting of the City Planning, Development and Business Affairs Committee dated 5 October 2024 orders that the public (with the exception of members of Corporation staff and any person permitted to remain) be excluded from this meeting to enable this meeting to receive, discuss or consider in confidence Item 10.2 [City of Adelaide Property Strategy] listed in the Agenda, on the grounds that such item of business, contains information and matters of a kind referred to in section 90(3) (b) & (d) of the Act.

DISCUSSION

1. Section 90(1) of the *Local Government Act 1999 (SA)* (the Act) directs that a meeting of Council must be conducted in a place open to the public.
2. Section 90(2) of the Act, states that a Council may order that the public be excluded from attendance at a meeting if Council considers it to be necessary and appropriate to act in a meeting closed to the public to receive, discuss or consider in confidence any information or matter listed in section 90(3) of the Act.
3. Section 90(3) of the Act prescribes the information and matters that a Council may order that the public be excluded from.
4. Section 90(4) of the Act, advises that in considering whether an order should be made to exclude the public under section 90(2) of the Act, it is irrelevant that discussion of a matter in public may -

   '(a) cause embarrassment to the council or council committee concerned, or to members or employees of the council; or

   (b) cause a loss of confidence in the council or council committee; or

   (c) involve discussion of a matter that is controversial within the council area; or

   (d) make the council susceptible to adverse criticism.'
5. Section 90(7) of the Act requires that an order to exclude the public:

   5.1 Identify the information and matters (grounds) from section 90(3) of the Act utilised to request consideration in confidence.

   5.2 Identify the basis – how the information falls within the grounds identified and why it is necessary and appropriate to act in a meeting closed to the public.

   5.3 In addition identify for the following grounds – section 90(3) (b), (d) or (j) of the Act - how information open to the public would be contrary to the public interest.
6. Section 83(5) of the Act has been utilised to identify in the Agenda and on the Report for the meeting, that the following report is submitted seeking consideration in confidence.

   6.1. Information contained in Item 10.1 – Proposal to Initiate Waste Code Amendment

   6.1.1 Is not subject to an existing Confidentiality Order.

   6.1.2 The grounds utilised to request consideration in confidence is section 90(3) (m) of the Act

   (m) information relating to a proposal to prepare or amend a designated instrument under Part 5 Division 2 of the *Planning, Development and Infrastructure Act 2016 (SA)* before the draft instrument or amendment is released for public consultation under that Act.

   6.2 Information contained in Item 10.2 – City of Adelaide Property Strategy

   6.2.1 Is not subject to an existing Confidentiality Order.

   6.2.2 The grounds utilised to request consideration in confidence is section 90(3) (b) & (d) of the Act

   (b) information the disclosure of which –

   (i) could reasonably be expected to confer a commercial advantage on a person with whom the council is conducting, or proposing to conduct, business, or to prejudice the commercial position of the council; and

   (ii) would, on balance, be contrary to the public interest;

   (d) commercial information of a confidential nature (not being a trade secret) the disclosure of which –

   (i) could reasonably be expected to prejudice the commercial position of the person who supplied the information, or to confer a commercial advantage on a third party; and

   (ii) would, on balance, be contrary to the public interest;

ATTACHMENTS

Nil

- END OF REPORT -

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