



Adelaide Park Lands Preservation Association, Inc.

www.adelaide-parklands.asn.au
secretary@adelaide-parklands.asn.au

P.O. Box 7334
Hutt Street, Adelaide SA 5000

Patron: Rev Dr Lynn Arnold AO

ABN 19 706 384 386

Submission to Adelaide City Council, regarding
SA Cricket Association proposal for Narnungga (Park 25)

The Park Lands are for all South Australians¹

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).²

1. Excessively long lease

This proposal “locks up” a very significant acreage of Park Lands for use by SACA for 42 years, beyond 2050. Effectively, the general community will be excluded from the whole of Park 25, so that SACA can take it over for cricket, with some limited use of one oval for football during winter. There will be extremely limited public access. The lease provisions for public access are so loose as to be almost worthless. The truth is that all of Park 25 is proposed to be exclusively controlled and managed by SACA, there is no effective provisions in the draft lease that gives any assurance of public access nor “community sports experience.” There is no public benefit to this proposal. This is an extraordinary proposal which must be modified if it is to go ahead at all. At the same time as consideration of this proposal, in contrast, the Management Strategy provides that: the “West Park Lands Precinct shall primarily be devoted to *accessible informal open space including community recreation and open woodlands.*”

2. Contrary to Park Lands Management Strategy

In the Adelaide Park Lands Management Strategy 2015 - 2025, the development of the new Royal Adelaide Hospital (RAH) and bio-medical precinct, revitalisation of the western end of Hindley Street and the University of South Australia’s expanding City West campus will see a substantial increase in the number of people accessing the north-west corner of the City, while the resident population in the west and south-west sectors of the CBD is forecast to grow more than any other area in the City over the next twenty years.

¹ Adelaide Park Lands Management Strategy 2015-2025. Adopted by Adelaide Park Lands Authority, May 2016. p 4.

²The Adelaide Park Lands Act 2005, Statutory Principal 1 b).

Within the same document, the Highest Priority for Narnungga (Park 25, at p41) is:

“Deliver a high quality formal park in Park 25 that is comfortable, aesthetically pleasing and provides amenity and attractions to appeal to residents and workers from the City’s west, and the broader community and that integrates with a community sporting hub providing a place of tranquillity and contemplation for staff, patients and visitors to the hospital and staff, students and visitors to the University’s City West campus. Additional recreational opportunities will be created to serve the anticipated growth in residents in the north-west of the CBD.”

Contrary to the outline quoted above, the SACA proposal is assuredly exclusionary to the wider community. That is clear from a careful reading of the lease. The title applied in the public consultation: “Community Sports Hub” is entirely misleading.

3. Inadequate provision for cycle linkages connecting Park 25 to adjoining parks

This proposal neglects to make proper provisions for cycle connections. The consultation documents do not show any at all. (See Fig 2). The Management Strategy calls for:

“re-orienting and improving the existing path network with lighting and pleasant areas in which to sit, reflect and relax provide pedestrians and cyclists with safe and convenient linkages to the park from the new RAH and Hindley Street in the east and from Thebarton and Mile End to the west.”

4. Car Parking on the Park Lands

This proposal includes permanent parking space for 136 cars. This is by far the largest car park in the Park Lands, excepting only temporary parking for the Royal Agricultural & Horticultural Society of SA. In the documentation, the only justification given is that there are already parking spaces in the vicinity on Park Lands. However it must be recognised that the existing spaces do not appear to have approval. They have been allowed to occur informally: “ad hoc and unsightly.”

Additionally, as any casual inspection will show, parking is spilling out onto park lands despite ‘no standing’ signs. Infringements appear to be ignored. Is it any wonder then that the existing car parking is flourishing?

Council Wide Objectives and Principles of Development Control within the Adelaide Development Plan (under the Development Act) clearly discourage car parking on Park Lands :

Objective 93: Reduce the visual, spatial and environmental impact of permanent car parks and other associated infrastructure for recreational facilities within the Park Lands.

Objective 100: Encourage the utilisation of non Park Land car park sites in the City or adjoining Council areas supported by expanded public transport and event services.

Clearly, authorising and constructing permanent parking space for 136 cars will not in any way meet these objectives. The number of 136 might well be increased when the proposal is assessed by the Development Assessment Commission.

The consultation document is inadequate where it says:

” the larger southern car park will be managed to prioritise access by people using the facilities in Narnungga (Park 25). Over the coming months, Council will be investigating ways to ensure this occurs”.

This begs the question, how will car parking be restricted to people using the facilities. Isn't that a bit of wishful thinking? Fig 2 shows the realigned access road as being outside of the SACA project works, so presumably Council will have to pay for that.

5. Inadequate details within consultation documents

The purposes of consultation, that is, informing the public about a proposal, is very poorly served by the consultation documents. Rather than impartially presenting adequate information, the documents contain some level of concealment of what is being proposed and how the proposal meets or fails to meet Council's own policies. Indeed, within the consultation document, there is no evaluative procedure at all.

For example, there is no floor plan of the proposed building included in the documents, just some generalised perspectives and a complicated section drawing.



Figure 1 Cross section but no floor plans

The various proposed uses of the building, and the lease document, cannot be fully understood. For example:

- There appears to be no public accessible toilets (compared to the University of Adelaide graduates club rooms on Warnpangga, Park 10).

- It appears that SACA will be the one and only sports organization able to use the building- The Old Ignatians Football Club (the sub-licencee) may use the change rooms only, and no other organisation or community group;
- above the basement, there are two floor levels., The uses of these areas appear to be for holding functions (licenced?) rather than for sports related activities but it is not at all clear in the documents.
- It needs to be noted, the text refers to the building being open during sporting functions, but surely that would mean it is exclusively for SACA uses.
- It might be noted that SACA already has significant areas within Adelaide Oval for conducting functions.
- The total floor area of the building is a significant increase over the floor area of the existing buildings. Objective 89 of the Development Plan stipulates:
“Enhance the Park Lands through the reduction in building floor areas, fenced and hard paved areas.
 (Building footprint, mentioned in the documents, is a different criterion).

At the very least, the proposal needs to be properly documented for the purposes of consultation as Community Land. As it has been presented to date, it is unclear as to what is proposed, and as such might be seen as not meeting the requirement for consultation.

6. Proposal is contrary to Development Plan

The proposal will be required to be assessed under the City of Adelaide Development Plan. As it stands, the proposal does not meet several of the Principles of Development Control for the Park Lands zone:

280 Development should ensure that the desired character and environment of the Park Lands Zone is enhanced and reinforced by:

(f) a reduction in building floor areas, fenced and hard paved areas;

286 Development should not further restrict public access to land within the Park Lands, including access for people with disabilities.

287 A comprehensive bicycle and pedestrian path network shown in Map Adel/1 (Overlay 8) should be provided within the Park Lands to increase the safety, convenience and enjoyment of the Park Lands for the City’s workers, residents and visitors.

289 Development should be limited to ensure that car parking sufficient to serve the needs of permanent activities in the Park Lands can be provided on roads through and around the Park Lands unless otherwise described in the relevant Policy Area.

Each of these principles together would be possible grounds for DAC rejection of the proposal as it stands.

7. Conclusion

To allocate all of Narnungga (park 25) to SACA for 42 years runs counter to all the benefits of the west Park Lands:

- The Adelaide Park Lands should be held for the public benefit of the people of South Australia;
- It locks up a very significant acreage of Park Lands for use by SACA for 42 years; the lease is far too long and there is no proper justification for such a long lease;
- The West Park Lands Precinct should be primarily be devoted to accessible informal open space including community recreation and open woodlands;
- The Highest Priority for Narnungga (Park 25, Page 41) calls for:

“Deliver a high quality formal park in Park 25 that is comfortable, aesthetically pleasing and provides amenity and attractions to appeal to residents and workers from the City’s west, and the broader community.”

The proposal is way beyond Council’s various policy documents, and importantly, does not benefit residents’ and visitors’ use and enjoyment of the Park Lands. As such, it needs to be rejected or at the very least highly modified.



Figure 2. Published for consultation: Overall plan for Park 25