

Festival Plaza Code Amendment Kadaltilla Submission

October 2024

Acknowledgement of Country

The Kadaltilla / Adelaide Park Lands Authority (Kadaltilla) acknowledges the Kurna 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 Kurna People have with the land and acknowledges that they are of continuing importance to the Kurna People living today.

Kadaltilla extends that respect to other Aboriginal Language Groups and other First Nations.

Kadaltilla is the principal advisor to both the Council and the State Government on the protection, management, enhancement and promotion of the Adelaide Park Lands.

Kadaltilla is a traditional Kurna word meaning Green place / Green lands / Park Lands.



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Introduction

On 12 September 2024 the Department for Housing and Urban Development wrote to Kadaltilla / Adelaide Park Lands Authority (Kadaltilla) advising that the draft Festival Plaza Code Amendment has been released for public consultation from 12 September to 24 October 2024.

The draft Festival Plaza Code Amendment proposes changes to the Planning and Design Code to guide future development in the Festival Plaza precinct, situated between Adelaide Railway Station, SkyCity Casino, Parliament House, and King William Road.

This submission outlines Kadaltilla's feedback regarding the draft Festival Plaza Code Amendment.

Key matters to be submitted to the consultation are set out in this submission under the following considerations:

- Alignment with the Principles of the *Adelaide Park Lands Act 2005 (SA)* (APL Act) and the Adelaide Park Lands Management Strategy (APLMS).
- Protection of the National Heritage Values and referral under the *Environment Protection, Biodiversity Conservation Act 1999* (Commonwealth) (the EPBC Act).
- Achievement of the principles of good planning as set out in the *Planning, Development and Infrastructure Act 2016 (SA)* (the PDI Act) and State Planning Policies (SPP), including SPP 1 – Integrated Planning, SPP 2 – Design Quality, and SPP 7 – Cultural Heritage.



1. Alignment with the APL Act and APLMS

The draft Code Amendment should be consistent with the principles outlined in the APL Act and the APLMS. The APLMS emphasises the importance of preserving public spaces, maintaining clear sightlines to the Adelaide Park Lands, and protecting heritage values. Any future development should aim to enhance community enjoyment and connection to nature, and not undermine these objectives by encroaching on valuable green space, obstructing views or diminishing the public's experience of the Adelaide Park Lands.

Development in the Riverbank Precinct should demonstrate exemplary design of the public realm and maintain public accessibility. Kadaltilla seeks for the Code Amendment to consider future development in the context of the Adelaide Park Lands and ensure that across the Adelaide Park Lands any losses to public access be offset through investment in restoring alienated areas of the Adelaide Park Lands and exploring alternative access to open space such as opening sections of Government House grounds.

Kadaltilla submits that:

- The scale and design of the development enabled by the Code Amendment should demonstrate stronger alignment with the APL Act and APLMS including preserving public spaces, maintaining clear sightlines to the Adelaide Park Lands, minimising encroachment on green areas, and protecting heritage values.
- Access to open space should be strengthened to offset any loss of public open space through the Code Amendment framework, such as investing in restoring alienated areas of the Adelaide Park Lands and exploring alternative access to open space such as opening sections of Government House grounds.
- The State Government should make its full vision for the Riverbank Precinct publicly available.

2. Protection of the National Heritage Values and referral under the EPBC Act

The Adelaide Park Lands and Parliament House are on the National Heritage List and as such the draft Code Amendment and any future development should be referred to the Federal Government for review under the *Environment Protection and Biodiversity Conservation Act 1999* (Cwth) for impact assessment.

Further consideration should be given to the separation between future development and Parliament House to preserve its heritage value while ensuring visual and physical connections are maintained. The setback proposed in The Code Amendment does not sufficiently demonstrate how the proposed setback to Parliament House respects heritage significance and visual connection to the Adelaide Park Lands.

Kadaltilla submits that:

- The State Government should undertake a referral to the EPBC Act as it relates to the National Heritage Values.
- The Code Amendment should specifically address vistas to and from the Adelaide Park Lands, including the view corridor for Elder Park.
- A greater distance should be maintained from Heritage Places, particularly Parliament House, to protect their visual prominence and historical context.

3. Alignment of the principles of good planning and SPPs

The prominence of One Festival Tower sets a new landmark within Festival Plaza and future development should be of a lower scale and visually subordinate to the dominance of Tower 1.

The view from Elder Park, set at a lower level, is significant. Elder Park is a key event space for Adelaide, and future development must be sensitive to its role in major state events. Large buildings should not unreasonably disrupt visual connection to the Karrawirra Pari / River Torrens and the Adelaide Park Lands.

Pedestrian activity at the street level and activation at the lower levels is encouraged, including active frontages, green spaces, and public amenities.



Kadaltilla supports the involvement of the Office for Design and Architecture SA (ODASA) in the design review process and adherence to the highest standards of architectural design, particularly given the cultural and environmental importance of the Festival Plaza precinct.

Kadaltilla recommends close examination of international precedents of sustainable and regenerative development such that future development in the Festival Plaza precinct complements its iconic cultural and heritage status, promotes biodiversity, reduces urban heat and achieve certification for sustainability.

Kadaltilla submits that:

- The building height allowance should be reduced to respond to the dominant height of Tower 1 rather than establishing the dominant height. The concept plan boundary should be minimised such that building footprint is constrained.
- Greater regard be given to SPP 7 and maintaining the context of a place of heritage value through appropriate and compatible design solutions.
- Future development should deliver a landmark architectural response with reference to leading international practice and adhering to the principles of ecologically sustainable and regenerative design, including green star certification.
- Future development should make a positive contribution to the public realm and at pedestrian scale, including pedestrian connectivity, greening at podium height, continuous canopies and shade cover, natural spaces and landscaping.

Conclusion

This section provides a consolidated response to the draft Code Amendment. Kadaltilla submits that:

- The scale and design of the development enabled by the Code Amendment should demonstrate stronger alignment with the APL Act and APLMS including preserving public spaces, maintaining clear sightlines to the Adelaide Park Lands, minimising encroachment on green areas, and protecting heritage values.
- Access to open space should be strengthened to offset any loss of public open space through the Code Amendment framework, such as investing in restoring alienated areas of the Adelaide Park Lands and exploring alternative access to open space such as opening sections of Government House grounds.
- The State Government should make its full vision for the Riverbank Precinct publicly available.
- The State Government should undertake a referral to the EPBC Act as it relates to the National Heritage Values.
- The Code Amendment should specifically address vistas to and from the Adelaide Park Lands, including the view corridor for Elder Park.
- A greater distance should be maintained from Heritage Places, particularly Parliament House, to protect their visual prominence and historical context.
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