



Adelaide Park Lands Association

c/o Affinity Business Advisers
Level 1, 458 Morphett Street
Adelaide SA 5000
secretary@adelaide-parklands.asn.au

ABN 19 706 384 386

Submission
Draft Park Lands Community Buildings (Sport and Recreation) Policy

<https://yoursay.cityofadelaide.com.au/park-lands-community-buildings>

OPEN, GREEN PUBLIC?

[The Objectives of the Adelaide Park Lands Association](#) (“APA”) specified in the Association’s Constitution, relevantly include “to ensure that:

- “i) the Park Lands are reserved as a place for public recreation, leisure and enjoyment;
- “ii) the public, so far as practicable, has free and unrestricted access to and use of the Park Lands;
- “iii) the Park Lands are preserved and maintained to give priority to biodiversity, including gardens, grassland, water, wetlands, trees and other vegetation rather than buildings, fences or artificial surfaces;
- “iv) alienated areas of the Park Lands are restored to Park Lands
- “v) the open space character of the Park Lands as a place dividing the City of Adelaide from the suburbs is preserved;
- “vi) the Park Lands are preserved and maintained in a manner that enhances their special place in the design of the City of Adelaide;
- “vii) the amenity of the Park Lands is not impaired by inappropriate development on Park Lands.”

APA simplifies and portrays the general thrust of these Objectives with the slogan “Open, Green, Public” and the diagram that appears on the last page of this submission.

It follows, therefore that the Association supports any new or amended legislation or policy that would advance these Objectives. Conversely, of course, APA would be critical of moves to hinder or thwart these Objectives.

The *Draft Park Lands Community Buildings (Sport and Recreation) Policy* (“the Draft Policy”) contains five principles, none of which advance these Objectives. Rather, when read together, the principles in the Draft Policy would tend to thwart or hinder some of these APA Objectives, (e.g. Objectives ii, iii, and vii).

www.adelaide-parklands.asn.au

Principle 1

Neither Draft Principle 1, nor any of its three draft Performance criteria suggests any limit on the extent to which the demands of “local community sport” would allow more and more of Open Green Public Park Lands to be lost under a proliferation of new “community sport” buildings. The principle is entirely concerned with the demands of community sport, without recognising the public interest in “free and unrestricted access to and use of the Park Lands”.

Principle 2

This Draft Principle suggests that delivering new community buildings should “prioritise”... “no net loss of Park Lands.” However it stops short of insisting on “no net loss” and fails to even suggest the possibility of restoring any public Park Lands previously lost to buildings. As drafted, this principle is not consistent with APA’s Objective (iv).

- Performance criteria 2.1 and 2.3 both fall short of requiring “no net loss”. Requiring “design features to reduce scale” begs the question: “reduced from what?” Criteria 2.1 suggests further loss of Park Lands should be “minimised” rather than prohibited.
- Performance criteria 2.2 envisages “engagement” with multiple stakeholders but falls short of prescribing that new buildings MUST be shared-use.

Principle 3

The suggested design features of proposed new buildings may be supported but are not directly relevant to any of APA’s Objectives.

Principle 4

Likewise, this principle is concerned with the design of buildings, rather than the separate matter of quantity, size, operation and control of buildings. Any building “*designed* to be accessible to all” may be easily rendered inaccessible by a lessee who is permitted to keep gates and doors locked, to exclude the public.

Principle 5


The proposed project co-funding criteria contain no reference to the public interest in “free and unrestricted access to and use of the Park Lands”. The reference to “benefits more than one user group or organisation” is welcome but the principle falls short of requiring any part of any proposed new facility to allow public use.

RECOMMENDATIONS:

APA suggests revising these principles to include or incorporate the following principles and complementary performance criteria:

- New sports buildings will be permitted only when development of the proposed new facility:
 - would be accompanied by demolition of old buildings to effect a net **increase** in Park Lands accessible to the public;
 - would be available to multiple sports organisations;
- Co-funding will be offered only when, and to the extent that public access is allowed and maintained during the entire term of any lease. (e.g. if only 25% of the building floor area is available to the public then Council’s contribution will not exceed 25%).

Shane Sody, President



25 November 2023

About the Adelaide Park Lands Association

Our Association was founded in 1987 as a non-profit community based organisation - a 'watchdog' to guard Adelaide's greatest treasure: the world-unique, National Heritage-listed Adelaide Park Lands.

But we are much more than a watchdog. We offer a focal point for South Australians to explore, be inspired by, protect and restore the Open Green Public spaces that are matched nowhere else in the world.

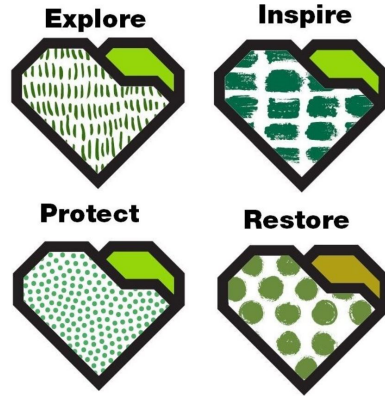
Our support comes from a broad cross-section of the South Australian community, across the political spectrum - people who Love Your Park Lands, as Open, Green, Public spaces.

On 25 November 2023, our newsletter subscription list contained 3,909 active subscribers.

Our following on Facebook was 5,429, and on Instagram 1,470. Our list of full (paid-up) members contained 560 names.

These numbers do not include sponsors, donors and subscribers to separate feeds for our Adelaide Park Lands Art Prize competition.

We "Explore, Inspire, Protect, Restore"
www.adelaide-parklands.asn.au/what-we-do



We simplify our Constitutional Objectives with this diagram:

PARK LANDS ARE OPEN, GREEN, PUBLIC (at least 2 out of 3)

If a proposed building or other permanent land use can't fit into at least two of these overlapping circles, then it's an **alienation** of the world-unique, National-Heritage-listed Adelaide Park Lands.

