

26 February 2020

Mr Michael Lennon
Chairperson
State Planning Commission

Via email: DPTI.PlanningReformSubmissions@sa.gov.au

Dear Mr Lennon

Re: Planning and Design Code – Royal Adelaide Showgrounds

This submission has been prepared by MasterPlan SA Pty Ltd on behalf of the Royal Agricultural & Horticultural Society of SA Inc. in relation to the Royal Adelaide Showgrounds located at Goodwood Road, Leader Street and Rose Terrace, Wayville.

The Royal Adelaide Showground site operates as a multi-function public venue and is located within the Showgrounds Zone of the Unley Council Development Plan. It is also divided into three (3) Policy Areas including the Core Policy Area 21, Rose Terrace Policy Area 22 and Leader Street Policy Area 23.

On behalf of our client, we have reviewed the Draft Planning and Design Code – Phase 3 consultation documents in relation to the subject land. A comparison table has been prepared showing the existing zoning and planning policy and the corresponding zoning and planning policy in the Code (**attached**).

The Planning and Design Code transitions the Showgrounds Zone and the existing Policy Areas to a Recreation Zone with no reference whatsoever to the unique function and activities that take place on the subject land and even no reference to Showground in general. This is a totally unacceptable transition.

Current Situation

The Showground site operates as a multi-function public event venue, holding a variety of activities and functions throughout the year including concerts, displays, events, exhibitions, markets and shows. The events are not limited to any one particular activity with a range of different activities being held on the site within a broader land use term of multi-function venue.

The Showground is located on a number of allotments, with the principle site (21.8 hectares) being legally described as Allotment 506 in Deposited Plan 86063, Hundred of Adelaide in Certificate of Title Volume 6083, Folio 257. This Certificate of Title is in the ownership of the Minister for Sustainability, Environment and Conservation and subject to a long-term lease to the Royal Agricultural & Horticultural Society of SA Inc.



The unique nature of the subject land was recognised many years ago when the Showgrounds Zone was established in the 1980's. The original objective for the zone was the "*accommodation of showground facilities, agricultural and horticultural shows and industrial and commercial exhibitions*".

The current zoning and planning policy relating to the Showground site was established by the Adelaide Showgrounds Development Plan Amendment, a Ministerial DPA that was authorised on 9 September 2010. The Adelaide Showgrounds DPA expanded the policy of the original Showgrounds Zone to recognise the variety of activities and functions that take place on the subject land and created the three (3) Policy Areas which expand on the function and character of the separate areas within the zone.

The Core Policy Area 21 takes up the majority of the area and accommodates a diverse range of activities including concerts, displays, events, exhibitions, functions, markets and shows.

The Rose Terrace Policy Area 22 relates to the frontages to Rose Terrace and Johnstone Terrace and is promoted as a "*vibrant, active, intense and dense mixed use strip*".

The Leader Street Policy Area 23 relates to the southern boundary frontages of Leader Street and is promoted as a "*mixed use, landscape character*" area.

Planning and Design Code

The Planning and Design Code transitions the whole of the subject land to a Recreation Zone, which we understand is the standard transition for all showgrounds within the State. While this may be a reasonable transition for most regional showgrounds which are traditionally located in conjunction with the town's recreation facilities, the transition to a Recreation Zone is entirely unsuitable for the Adelaide Showground site.

The standard Recreation Zone module in the Planning and Design Code has a Desired Outcome for the provision of a range of accessible recreation facilities and a Performance Outcome of "*development is associated with or ancillary to the provision of structured, unstructured, active and/or passive recreational facilities*". The Desired and Performance Outcomes have no relevance to the showgrounds use, nor is "*showgrounds*" listed as a suitable land use within the zone.

Given the unique and diverse nature of the use of the subject land, it is considered that the Recreation Zone is not a suitable match in the proposed transition process, even if it was to be modified to include reference to the generic Showground use. We also consider that there is no other generic land use zone that could be a suitable alternative option.

For all of these reasons we consider that there is suitable justification to establish a new Zone or Subzone specifically for the Adelaide Showgrounds site.



Subzones have been established to set out additional policies or rules relating to the character of a particular part of a zone and have already been used a number of times in other zones.

It is considered that a separate Zone or Subzone for the subject land would provide the opportunity to retain the unique features of the subject land and in particular recognise the different function and character of the Policy Areas.

This approach is consistent with the views of the Unley City Council which are expressed as follows in their submission to the Planning and Design Code for the whole of their Council Area:

"The current Showgrounds Zone is not effectively represented with the suggested Recreation Zone not reflecting the nature, diversity and intensity of activity. A specific zone is required for this iconic unique activity based upon the existing zone and policy areas."

It is recognised that the Planning and Design Code does not include Desired Character Statements and some of the existing policy in the current Showgrounds zone and the Policy Areas will be included in the relevant Overlays and General Policy.

However, the Overlays and General Policy do not include the unique land use and built form character policy that exists in the current zoning. These need to be transitioned into the relevant policy in a specific subzone to include Desired Outcomes, Performance Outcomes and Deemed to Satisfy/Designated Performance Outcome Criteria.

On behalf of the Royal Agricultural & Horticultural Society of SA Inc. we request that the existing planning policy relating to the Adelaide Showground located at Goodwood Road, Leader Street and Rose Terrace, Wayville be retained in the transition to the Planning and Design Code. It is requested that substantial amendments be made to recognise the specific nature of the Showgrounds site. It is recommended that this be done with the introduction of a new Zone or Subzone with appropriate Desired Outcomes, Performance Outcomes and Deemed to Satisfy/Designated Performance Outcome Criteria.

Should you require any further details on this submission, please do not hesitate to contact the undersigned.

Yours sincerely

Greg Vincent
MasterPlan SA Pty Ltd

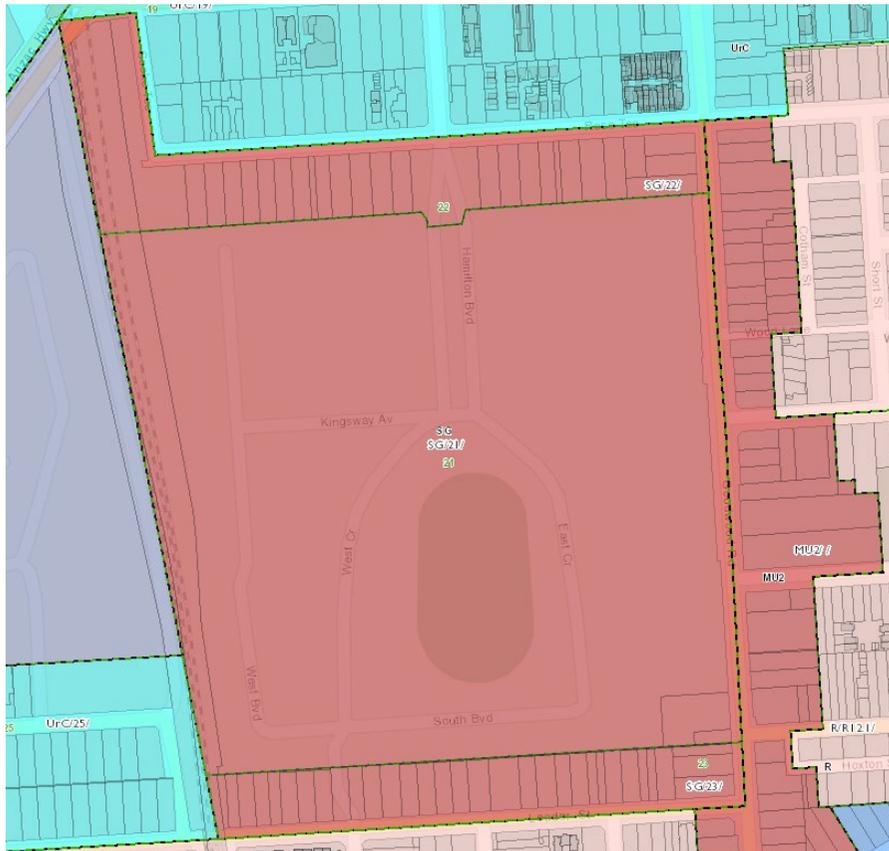
enc: Comparison Table.

cc: John Rothwell RA&HS Society.

ADELAIDE SHOWGROUD, WAYVILLE

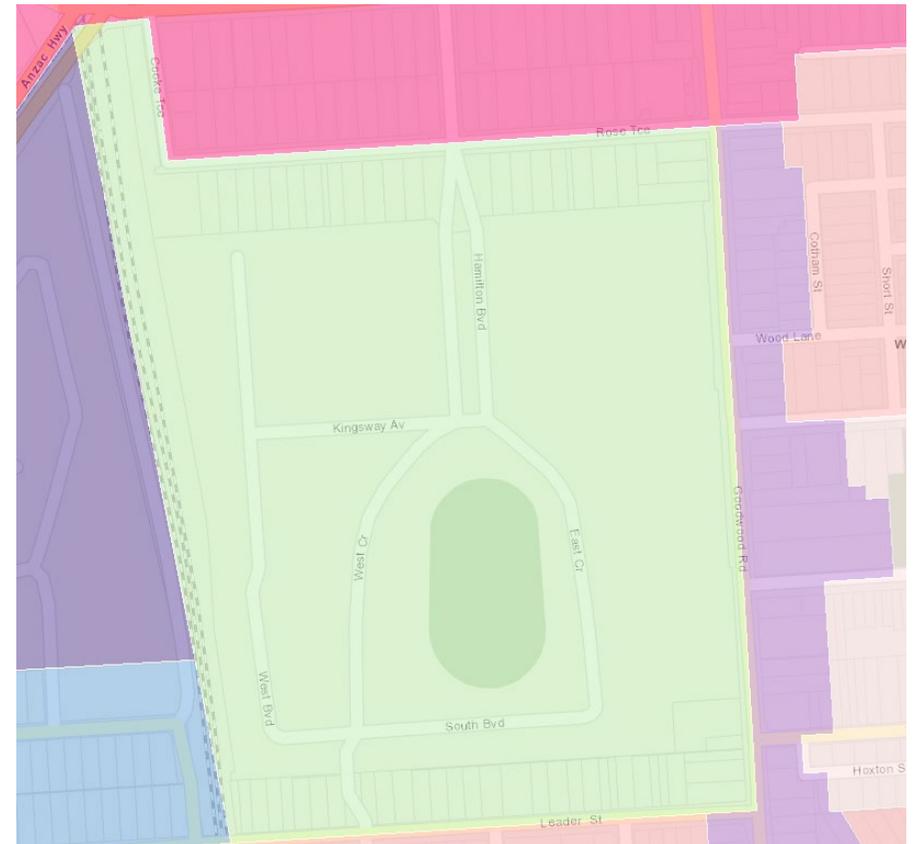
Existing Council's Development Plan

Development Plan: Unley Council
Showground Zone (SG)



New Planning and Design Code

Planning and Design Code Phrase 3
Recreation Zone





Existing Council's Development Plan	New Planning and Design Code
<p>Policy Area Core Policy Area 21 Rose Terrace Policy Area 22 Leader Street Policy Area 23</p> 	
<p>OBJECTIVES</p> <p>Objective 1: A zone accommodating a diverse range of land uses and forms of development within designated areas.</p> <p>Objective 2: Enhanced general appearance of the zone.</p> <p>Objective 3: Development that supports the viability of community services and infrastructure.</p> <p>Objective 4: Enhanced integration of the zone with surrounding areas through active road frontages and safe and convenient access to public transport systems.</p> <p>Objective 5: Development that protects the functionality of and safe movement along the arterial road system. Objective 6: Development that contributes to the desired character of the zone.</p>	<p>DESIRED OUTCOME (DO)</p> <p>DO 1: Provision of a range of accessible recreational facilities.</p>



Existing Council's Development Plan	New Planning and Design Code
<p>DESIRED CHARACTER</p>	<p>N/A There are no Desired Character Statements in the P&D Code.</p>
<p>PRINCIPLES OF DEVELOPMENT CONTROL</p> <ol style="list-style-type: none"> 1. A diverse range of activities and kinds of development are envisaged within the zone. 2. Development listed as non-complying is generally inappropriate. 3. Development should not be undertaken unless it is consistent with the desired character for the zone. 4. Development should be of a high architectural standard that responds to and reinforces positive aspects of the local environment through appropriate contemporary design. 5. Building facades should be well articulated particularly where adjacent zone boundaries. 6. Buildings addressing public roads bounding the zone should incorporate architectural features and landscaping that result in a human scale at street level. 7. Development at the periphery of the zone should be designed to overlook road reserves and other public spaces in order to promote the personal safety of people. 8. Development at the periphery of the zone should be sited and designed to provide an acoustic buffer to surrounding zones. 9. Development should minimise direct access to the arterial road system, avoid the need for additional traffic signals on the Strategic Road Network and provide internal movements to avoid the need for right turn movements out onto the arterial road system. 10. Development should be sited and designed to maximise the provision of off-street car parking facilities. 11. Off-street car parking should be provided in accordance with Table Un/5, unless it can be demonstrated that fewer car parks would meet the car parking needs associated with the development. Such a decision may have regard to one or more of the following: <ol style="list-style-type: none"> (a) the provision of shared use car parking where the peak parking demand for different activities occurs at different times (b) evidence is provided that a lesser parking demand has been applied to similar uses elsewhere (c) ease of access to public transport. 12. Car parking facilities should be sited and designed in order to facilitate shared use by adjoining activities whether within or outside the zone. 	<p>PERFORMANCE OUTCOMES AND DEEMED TO SATISFY / DESIGNATED PERFORMANCE OUTCOME CRITERIA</p> <p><u>Land Use and Intensity</u></p> <p>PO 1.1: Development is associated with or ancillary to the provision of structured, unstructured, active and / or passive recreational facilities.</p> <p>DTS/DPF 1.1 Development comprises one or more of the following land uses:</p> <ul style="list-style-type: none"> • Change rooms • Golf course • Indoor recreation facility • Open space • Outdoor sports courts • Recreation area • Sporting clubrooms • Sporting ovals and fields <p>PO 1.2 Shops including restaurants are of a scale that is subordinate to the principal recreational use of land.</p> <p>DTS/DPF 1.2 Shop gross leasable floor area does not exceed 80m².</p> <p>PO 1.3 Offices are of a scale that is subordinate to the principal recreational use of land.</p> <p>DTS/DPF 1.3 Office gross leasable floor area does not exceed 80m².</p> <p>Note: There are no vehicle parking rates in the Recreation Zone provision. Reference is made to the General Development Policies (Part 4) Transport, Access and Parking [Vehicle Parking Rates] DTS/DPF 5.1</p> <p>There is no numeric building height and lot frontage constraint. Adelaide Show Ground is not in the Maximum Building Height Levels Technical and Numeric Variation Overlay, the Maximum Building Height Metres Technical and Numeric Variation Overlay, or the Minimum Building Height Levels Technical and Numeric Variation Overlay, reviewed on 20/02/2020</p>



Existing Council's Development Plan	New Planning and Design Code
<p>13. Subject to the provision of land for the widening of pedestrian footways where desirable, buildings occupying corner sites should be situated close to and address both street frontages.</p> <p>14. Buildings should be set-back at least 3.0 metres from the Goodwood Road, Rose Terrace and Leader Street frontages of the zone to enable provision of a pedestrian walkway and environment of sufficient width and amenity to safely and conveniently accommodate expected pedestrian movements.</p> <p>15. Development should be consistent with the relevant provisions in the current Environment Protection (Noise) Policy.</p> <p>16. Sensitive land uses should be separated from animal keeping and other activities likely or having potential to cause air quality impacts.</p> <p>17. Animal keeping and other activities involving animals should be sited, designed and managed to avoid adverse impacts on surrounding uses through, amongst other things, appropriate use of: (a) management of effluent and other wastes; (b) dust suppression techniques in sand and other like filled areas; and (c) fodder storage areas capable of withstanding vermin infestation.</p> <p>18. Retail development in the zone should not hinder the development or function of any centre zone.</p>	<p><u>Built Form and Character</u></p> <p>PO 2.1 Buildings designed and sited to manage visual impacts.</p> <p>DTS/DPF 2.1 Buildings are set back:</p> <p>(a) 50m or greater from a primary street frontage; and</p> <p>(b) 50m from the boundary of an allotment containing, or zoned to primarily accommodate, a sensitive receiver in other ownership.</p> <p>PO 2.2 Outbuildings of a scale that manages visual impacts.</p> <p>DTS/DPF 2.2 Outbuildings have a:</p> <p><u>Concept Plans</u></p> <p>PO 4.1 Development is compatible with the outcomes sought by any relevant Concept Plan contained within the <i>Concept Plans Technical and Numeric Variation Overlay</i>.</p> <p>DTS 4.1 None are applicable.</p>
<p>PROCEDURAL MATTERS</p> <p><u>Complying Development</u></p> <p>19. Those kinds of development listed in Table Un/7, together with the following kind of development (including combinations thereof, or more than one of a particular kind) are complying in the Showground Zone, other than in respect of a Local Heritage Place identified in Table Un/3 or Table Un/4, subject to the conditions prescribed in Table Un/1.</p> <p>Advertisement</p> <p><u>Non-complying Development</u></p> <p>20. The following kinds of development (including combinations thereof, or more than one of a particular kind) are non-complying in the Showground Zone, with the exception of alterations and additions to an existing building or structure on its existing site:</p> <ul style="list-style-type: none"> • Detached Dwelling • General Industry • Group Dwelling • Hospital • Major Public Service Depot 	<p><u>Development types refer to Recreation Zone Tables:</u></p> <p>Table 1 Accepted Development Classification</p> <p>Table 2 Deemed-to-Satisfy Development Classification</p> <p>Table 3 Performance Assessed Development Assessment Table</p> <p>PROCEDURAL MATTERS</p> <p><u>Notification of Performance assessed development</u></p> <p>Performance assessed development is excluded from notification except where it involves any of the following:</p> <p>(a) the development is located adjacent to the boundary of a zone that primarily intends to accommodate sensitive receivers; or</p> <p>(b) the development falls within the category of 'all other code assessed development' in <u>Placement of Notices – Exemptions for Performance Assessed Development</u></p> <p>None specified.</p> <p><u>Placement of Notices – Exemptions for Restricted Development</u></p> <p>None specified.</p>



Existing Council's Development Plan	New Planning and Design Code
<ul style="list-style-type: none"> • Motor Repair Station • Multiple Dwelling • Petrol Filling Station • Road Transport Terminal • Row Dwelling • Semi-detached Dwelling • Special Industry • Waste reception, treatment, storage or disposal <p><u>Public Notification</u></p> <p>21. The following kinds of development are assigned as Category 1 Development in the Showground Zone: All development except:</p> <ul style="list-style-type: none"> (a) development in Rose Terrace Policy Area (b) development in Leader Street Policy Area 23 (c) development having a frontage to Goodwood Road (d) non-complying development. <p>22. The following kinds of development are assigned as Category 2 Development in the Showground Zone: All development (except non-complying development):</p> <ul style="list-style-type: none"> (a) in Rose Terrace Policy Area 22 (b) in Leader Street Policy Area 23 (c) having a frontage to Goodwood Road. 	
<p>There is no land division policy in the Showground Zone. Refer to DPA->Council Wide->Land Division Policy.</p>	<p><u>Land Division</u></p> <p>PO 3.1 Land division supports the provision of recreational facilities</p> <p>DTS/DPF 3. Land division is for the purposes of:</p> <ul style="list-style-type: none"> (a) the creation of a public road or a public reserve; or (b) a minor adjustment of allotment boundaries to remove an anomaly in existing boundaries with respect to the location of existing buildings or structures.



Existing Council's Development Plan	New Planning and Design Code
<p>CORE POLICY AREA 21</p> <p><u>Desired Character</u></p> <p>The Core Policy Area will have a vibrant character resulting from the accommodation of a diverse range of activities including concerts, displays, events, exhibitions, functions, markets and shows. Such activities will often be of a temporary nature.</p> <p>Forms of development which support activities accommodated by the policy area will be arranged in a cohesive and coordinated manner to facilitate convenient movement of high volumes of pedestrians within, into and out of the policy area. Pedestrian comfort will be facilitated by the provision of suitably sized, covered and attractive walkways and like spaces and street furniture.</p> <p>Development within the policy area will take advantage of separation from low-density residential environs.</p> <p>The frontage of the Policy Area to Goodwood Road will be attractive, active, open and inviting. To this end, development at the eastern periphery of the policy area will include a range of commercial land uses (such as a community centre, a child care centre/pre-school, exhibition facilities, a gymnasium, a hotel, a motel, offices and restaurants) and will be orientated towards Goodwood Road.</p> <p>Security fencing visible from Goodwood Road will be located behind the primary building frontage line and will be of an open and decorative nature as opposed to purely utilitarian in nature.</p> <p>Uses within the policy area will, when appropriate, be designed and constructed to withstand noise from events and vehicle movements along Goodwood Road to an appropriate degree.</p> <p><u>Objectives</u></p> <p>Objective 1: A policy area accommodating a range of land uses and forms of development.</p> <p>Objective 2: An active, open and inviting frontage to Goodwood Road.</p> <p>Core Policy Area 21</p> <p><u>PRINCIPLES OF DEVELOPMENT CONTROL</u></p> <p>1. The following forms of development are envisaged in the policy area:</p> <ul style="list-style-type: none">• Active Outdoor Recreation• Amusement Machine Centre• Animal Keeping• Caravan Park• Community Centre• Consulting Room	<p>N/A</p> <p>There is no distinction in policy between the two areas that are currently separate precincts. The proposed policy for the zone applies to the whole area.</p>



Existing Council's Development Plan	New Planning and Design Code
<ul style="list-style-type: none">• Convention Centre• Educational Establishment• Hall• Hotel• Indoor Recreation Centre• Market• Motel• Office• Recreation Area• Restaurant• Special Event• Sports Ground <p>2. Development should not be undertaken unless it is consistent with the desired character for the policy area.</p> <p>3. Development that has frontage to Goodwood Road should be orientated towards Goodwood Road.</p> <p>4. Development adjacent the Goodwood Road frontage of the Policy Area should not comprise less than 3 storeys above natural ground level.</p> <p>5. Where visible from Goodwood Road, security fences should:</p> <ul style="list-style-type: none">(a) be located behind the primary building frontage line;(b) be of an open nature;(c) be articulated to add visual interest. <p>6. Tourist accommodation in the form of a caravan park should:</p> <ul style="list-style-type: none">(a) be of a temporary nature and sited and designed to be screened from view from public roads;(b) incorporate access to appropriate multiple use facilities including amenity blocks and catering areas;(c) be equipped with a safe and convenient network of paths for combined convenient pedestrian and low-speed vehicle movement;(d) be equipped with sufficient vehicle parking where parking spaces are either associated with individual sites or grouped in a location convenient to users.	



Existing Council's Development Plan	New Planning and Design Code
<p>Rose Terrace Policy Area 22</p> <p><u>Desired Character</u></p> <p>The Rose Terrace Policy Area will emerge as a vibrant, active, intense and dense mixed use strip.</p> <p>Development within the policy area will be of a high density to support proximate infrastructure, services, facilities and concentrations of employment opportunities and take advantage of separation from established residential environs where low density housing prevails.</p> <p>Rose Terrace will develop a townscape character through the construction of buildings close to street frontages. Buildings will be orientated to Rose Terrace and include ground level uses such as cafes, restaurants and local shops selling convenience goods that generate pedestrian activity and span day and night time hours in order to achieve active road frontages. Uses established within the policy area will nevertheless be sensitive to residential and other sensitive activities through their nature, design and operating hours.</p> <p>Buildings occupying corner sites, including those at the intersection of Rose Terrace and the Johnstone Terrace entrance to the Core Policy Area, will be orientated towards both frontages to the public realm. The Johnstone Terrace entrance to the Core Policy Area will be a focal point within the policy area through it, in particular, being framed by uses such as cafes, restaurants and local shops.</p> <p>Car parking developed within the policy area will be shielded from view from street level through it being located either below ground level, above active land uses occupying ground level or behind building facades.</p> <p>Uses within the policy area will, when appropriate, be designed and constructed to withstand noise from events, vehicle movements along Goodwood Road and train movements along the railway corridor to an appropriate degree.</p> <p><u>Objectives</u></p> <p>Objective 1: Accommodation of car parking, consulting room, hotel, office, residential, restaurant, shop and tourist accommodation uses.</p> <p>Objective 2: Accommodation of high density residential development, including a minimum 15 percent affordable housing, in conjunction with non-residential development.</p> <p><u>Principles Of Development Control</u></p> <p>1. The following forms of development are envisaged in the Rose Terrace Policy Area:</p> <ul style="list-style-type: none">• Car Parking• Consulting Room• Educational Establishment• Hotel	



Existing Council's Development Plan	New Planning and Design Code
<ul style="list-style-type: none"> • Motel • Office • Residential Flat Building • Restaurant • Shop • Tourist Accommodation <ol style="list-style-type: none"> 2. Development should not be undertaken unless it is consistent with the desired character for the policy area. 3. Development should not comprise less than three and more than seven storeys (or 24.5 metres) above natural ground level. 4. Development should be sited and designed with a view to promoting after-hours use to reinforce the policy area as an area of social activity within the district. 5. Residential development, including affordable housing, and development comprising a variety of residential and non-residential uses should be developed only if it does not prejudice the operation of existing or future activity within the Core Policy Area. 6. Car Parking facilities should: <ol style="list-style-type: none"> (a) only be at grade and of an open nature if not prominent from public roads; (b) include active uses adjacent Rose Terrace. 7. Loading spaces should be located and designed to: <ol style="list-style-type: none"> (a) limit impacts on adjacent and nearby uses; (b) be screened from view from Rose Terrace. <p>Leader Street Policy Area 23</p> <p><u>Desired Character</u></p> <p>The Leader Street Policy Area will attain a mixed use, landscaped character.</p> <p>Development within the policy area will be of medium density to support proximate infrastructure, services and facilities and concentrations of employment opportunities.</p> <p>Buildings will be orientated towards Leader Street and include ground level uses such as cafes, restaurants and local shops selling convenience goods that generate pedestrian activity and span day and night time hours in order to achieve active road frontages. Uses established within the policy area will nevertheless be sensitive to residential and other sensitive activities through their nature, design and operating hours.</p> <p>Shops and other land uses expected within centre type zones should be of a small scale and serve a local function only so as to preserve the role and function of designated centres.</p> <p>The policy area will provide the majority of the access options for loading required to support activities undertaken in the Core Policy Area. Spaces for loading may also be established in the</p>	



Existing Council's Development Plan	New Planning and Design Code
<p>policy area but will be carefully located and designed to ensure avoidance of impacts on adjacent and nearby activities within and outside the policy area and to be screened from view from Leader Street.</p> <p>Uses within the policy area will, when appropriate, be designed and constructed to withstand noise from events, vehicle movements along Goodwood Road and train movements along the railway corridor to an appropriate degree.</p> <p>Development near to the railway corridor and associated level crossing at the western end of the policy area will not impede the ability to improve this level crossing through grade separation or other means.</p> <p><u>Objectives</u></p> <p>Objective 1: Accommodation of car parking, consulting room, hotel, office, residential, retail showroom, service industry and warehouse uses.</p> <p>Objective 2: Accommodation of residential development, including a minimum 15 percent affordable housing, in conjunction with non-residential development.</p> <p>Objective 3: Development that minimises adverse impacts on the amenity of adjacent land in residential zones.</p> <p><u>Principles of Development Control</u></p> <p>1. The following forms of development are envisaged within the Leader Street Policy Area:</p> <ul style="list-style-type: none">• Car Parking• Consulting Room• Educational Establishment• Hotel• Motel• Office• Residential Flat Building• Retail Showroom• Service Industry• Shop• Tourist Accommodation• Warehouse	



Existing Council's Development Plan	New Planning and Design Code
<ol style="list-style-type: none"> 2. Development should not be undertaken unless it is consistent with the desired character for the policy area. 3. Development should not comprise less than two and more than three storeys (10.5 metres) above natural ground level. 4. Development should be sited and designed with a view to promoting after-hours use to reinforce the policy area as an area of social activity within the district. 5. Shops and or groups of shops should not have a gross leasable floor area greater than 500 square metres. 6. Residential development, including affordable housing, and development comprising a variety of residential and non-residential uses should be developed only if it does not prejudice the operation of existing or future activity within the Core Policy Area. 7. Car parking facilities should: <ol style="list-style-type: none"> (a) only be at grade and of an open nature if not prominent from public roads; (b) include active uses adjacent Leader Street. 8. Access to loading spaces supporting activities undertaken in the Core Policy Area should be provided from Leader Street. 9. Loading spaces should be located and designed to: <ol style="list-style-type: none"> (a) limit impacts on adjacent and nearby uses; (b) be screened from view from Leader Street. 10. Development at the western end of the policy area should be set-back from Leader Street and the railway corridor a distance which would preserve options to improve the Leader Street crossing of the railway corridor. 	
<p>OVERLAY</p> <ul style="list-style-type: none"> • Affordable Housing Overlay 	<p>OVERLAY</p> <ul style="list-style-type: none"> • Local Heritage Place Overlay • State Heritage Place Overlay • Airport Building Heights (Regulated) Overlay • Building Near Airfields Overlay • Major Urban Transport Routes Overlay • Traffic Generating Development Overlay • Urban Transport Routes Overlay • Future Road Widening Overlay • Prescribed Wells Area Overlay • Regulated Trees Overlay • Sloping Land Overlay