

27th February 2020

Anita Allen
Manager, Planning Reform
Department of Planning Transport and Infrastructure
50 Flinders Street
Adelaide SA 5000

RE: Flinders Village Submission – Planning and Design Code – Innovation Zone.

Dear Ms Allen,

I write to you regarding the draft Planning & Design code and the opportunity to provide comment and feedback. We have prepared the attached submission, with the assistance of URPS, regarding the consideration of our Flinders Village development against the draft code.

We would appreciate the opportunity to meet with you in person and discuss our submission to ensure the Flinders Village development is appropriately accommodated within the new code. As you are aware, Flinders Village is a significant project both for the University and the State, and we are seeking to ensure that the current planning conditions governing this site are retained in the new code.

Shane Jennings (Interim Director – Property, Facilities & Development) is our primary contact for this work so please direct any further enquiries to Shane directly on [REDACTED] or email [REDACTED]

I look forward to continuing to work with DPTI as Flinders delivers this significant project for South Australia.

Yours sincerely,



Mark Gregory
Vice-President, Corporate Services
Flinders University

Ref: 2020-0010



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Anita Allen
Manager Planning Reform
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By email: dpti.planningreformsubmissions@sa.gov.au

Dear Anita,

Flinders Village Submission – Planning and Design Code - Innovation Zone.

Introduction

We make this submission on behalf of Flinders University, and in particular with regard to the Flinders Village precinct in the early stages of development on the western side of University Drive located within the Bedford Park Campus. The following figure depicts the location of the Flinders Village.



Figure 1: Flinders Village Location

About Flinders Village

Flinders University has enjoyed considerable growth in recent years and is well on its way to delivering the ambitious targets of its Strategic Plan, *Making a Difference – The 2025 Agenda*. Flinders University is building on this success through the creation of Flinders Village, enabling future growth and providing a great campus experience in a globally competitive precinct.

The vision is to create a vibrant urban centre that will become a lifestyle focus for southern Adelaide. From high-tech research facilities to cafés, shops and entertainment, Flinders Village will be a place to live, learn, innovate, work and enjoy.

An expanded residential offering for students will be a key part of the Village, with the wider community to share its amenities. This will be a cultural and creative hub that is a beacon of progress, embodying sustainability and sympathetic to its surrounds.

Such a vision cannot be achieved in isolation. The extension of the Flinders rail line, a crucial transport connection, is a critical enabler. The state and federal governments have already made a \$125 million investment in this important infrastructure that is the key to unlock this potential. It is the catalyst that will enable Flinders University to attract \$1.5 billion in investment that will bring this vision to life.

The new transport link will connect Flinders University to an ever-widening community and will improve access to the CBD for students living on campus.

Flinders Village represents a transport-oriented development that will be a magnet for staff and students and a lifestyle hub for our neighbouring communities, delivering significant economic and social benefit for the state.

As Flinders Village evolves, a combination of public and private investments will deliver:

- Retail and services
- Recreation and entertainment
- Commercial and office spaces
- Community gardens
- Student spaces
- Research, and research commercialisation incubators
- Health commercialisation and start-ups
- Innovation incubators, co-working spaces and hubs
- Health and wellness clinics and consulting suites
- Health professional and administrative services
- Art, community and cultural spaces
- Childcare
- Car parking to service Flinders Village
- A hotel and serviced apartments
- Conference facilities

Accommodation within Flinders Village is expected to include:

- New and upgraded student accommodation
- Transitional healthcare accommodation
- Short-term stay for patients' visitors and families
- Longer-term stay for academics and staff
- Aged care and retirement living.

The environment Flinders Village creates will provide seamless integration with local partner hospitals, enhancing the Flinders community experience for patients and staff. This integration also provides invaluable opportunities for Work-Integrated Learning for students, and vital translation of clinical research into solutions for the health industry.

The following figure outlines an indicative overview of the Flinders Village precinct. This is currently being reviewed as part of the initial development planning.



Figure 2: Flinders Village Indicative Master Plan

We have examined the draft Planning & Design Code and assessed that the the zoning proposed by the Code is not fit for purpose when referenced to current and intended operations within the Flinders Village.

Affected Area and Current Development Plan

The Flinders Village site is currently accommodated within Regional Activity Zone within the Mitcham (City) Development Plan and is further supported by a tailored desired character for the Flinders Village Area.

This existing desired character anticipates:

The Flinders Village Area will be focused around the Flinders Link rail station. It will cater for medium to high density, inter-generational residential developments including multi-storey dwellings, residential flats, student accommodation, aged care and affordable housing, as well as tourist accommodation. The Area will also be the focus for a variety of mixed uses that support the daily needs of on-site residents such as retail, entertainment and community facilities; together with offices and consulting rooms that complement the health, education and research activities of the Core Area. Ground level land uses such as entertainment and retail, which provide night and day activation will be concentrated around the Flinders Link station to promote interest, safe movement and convenient access to goods and services. In the short term, this will be provided with temporary activation which will be transitioned to permanent development over the medium to long term. Features and activities that attract people and add vitality to the area such as display windows, retail shopfronts and outdoor dining areas will generally be at street level.

The Flinders Link rail station will provide an important public transport link between the Flinders site, Tonsley and the Adelaide central business district. There will be a significant focus on safe and efficient movement for vehicles (including emergency vehicles and helicopters), pedestrians and cyclists throughout the Area as well as to adjacent areas and key sites. Building design will emphasise movement between the rail station and the Flinders Medical precinct, potentially via a pedestrian overpass, and the Flinders University.

Public open space will play an important role by providing a variety of safe, amenable and functional areas for social, recreational and environmental opportunities. It will incorporate public art and community facilities. Extensive landscaping will be provided throughout the site to ensure a cohesive environment.

The following types of development are envisaged within the Flinders Village Area:

*Active outdoor recreation
Consulting room
Community centre
Educational establishment
Hospital
Office
Parking facility
Recreation area
Student accommodation*

The current Mitcham (City) Development Plan Regional Activity Zone has a separate Principle of Development Control 2, which specifically relates to the Flinders Village Area. It states:

The following additional types of development, or combination thereof, are envisaged in the Flinders Village Area of the zone:

Affordable housing

Aged persons accommodation

Community centre

Educational establishment

Entertainment venue

Indoor recreation centre

Multiple dwelling

Place of worship

Residential flat dwelling

Restaurant

Row dwelling

Shop or group of shops (excluding a bulky goods outlet)

Tourist accommodation.

This policy was clearly drafted having regard to the needs of the Flinders Village precinct. Unfortunately, it appears that the the transition to the new Code, the bespoke planning approach has been lost and we are concerned that this may result in additional public notification processes and in some case may prevent elements of the Flinders Village from being delivered.

The Planning and Design Code

It is our understanding that, barring a few exceptions, the initial implementation of the Planning and Design Code is seeking to establish the nearest policy equivalent to what currently exists, by selecting a compatible type of zone from Planning SA's pre-established policy library/Council's Development Plans.

We have therefore shaped our assessment according to how faithfully this policy transfer reflects the current situation. The existing Regional Activity Zone with its additional specific Flinders Village policy reasonably accommodates the nature of current and intended activities within the Flinders Village area and we would expect the new policy regime to equally do so.

The Phase Three consultation draft of the Planning and Design Code assigns the Flinders Village area to an Innovation Zone.

The zone's policy content relates to a range of sites and associated land uses across broader metropolitan Adelaide. However, the zone's provisions do appear to carry limitations or lack of connection in respect to the specialised master plan for Flinders Village, especially in its treatment of shops, offices and consulting rooms.

Put simply, the vision for the Flinders Village constitutes much more than an extension of a typical university campus.

Flinders University is committed to fostering a vibrant and engaging university experience, with a new mixed-use village as a focal point for research innovation, commercial activity and residential living to complement its exceptional learning environment.

There is a comprehensive mix of activities in and around Flinders, including education, research, health, sport and recreation, retail, business, commercial and residential. In developing our plan for Flinders Village, the University has undertaken a detailed land use demand and supply assessment, and considered the mix of complementary land uses that will provide an optimum urban environment at Flinders Village.

Flinders Village will provide the infrastructure opportunities to support future additional community services, such as childcare, schools, healthcare, parks, places for worship and other general community facilities, to cater to our growing population of students, staff and residents at Flinders.

When reading the provisions for the proposed Innovation Zone, the approach to the assessment shops in particular is problematic. Shops greater than 500 square metres are identified as restricted development. Shops, consulting rooms and offices should not exceed 250 square metres of gross leasable floor area and appear to be limited only to the ground floor of buildings. Such a restriction places a considerable barrier to the delivery of the Flinders Village master plan.

Additionally, the Innovation Zone seeks to limit building heights within the zone and appears to suggest that building height will not be greater than any maximum or minimum specified 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*.

These overlays do not appear to apply to the Flinders Village site, and whilst this is desirable, Flinders University nevertheless seeks clarification as to whether such height restrictions are intended to apply, and if so, what the quantum of such restriction will be.

State Strategic Significance

It seems unfortunate that a site of such strategic importance is encumbered by a generic policy approach that applies to all manner of employment lands and associated uses. The creation and operation of Flinders University is of a high order strategic nature that has been purposefully mandated by Government. It should therefore be reasonable to expect that the strategic purpose of Flinders University operations should not in any way be undermined by a lower order of policy construction.

Accordingly, whilst Flinders University supports the proposed rezoning of land in the most general of terms, it is however extremely concerned that the existing bespoke policy and proposed introduction of restrictive controls presents a real and strongly opposed barrier to the delivery of Flinders Village.

It is the recommendation of Flinders University and URPS that significant activities meeting a high level strategic imperative mandated by Government should be accommodated within the local planning system through the likes of a "Flinders University Sub-Zone", that better reflects the bespoke policy of the existing Development Plan.

Conclusions

We are of the view that the proposed new zoning fails to provide a policy framework that promotes the development of Flinders Village and that exists under current zoning and therefore produces the potential to significantly disadvantage Flinders University's interests.

In summary we recommend:

- All envisaged uses for the Flinders Village precinct should be identified as a "Performance Assessed Development" with reference to associated policies (and thereby generally excluded from notification).
- Shops, should not be listed as a Restricted class of development.
- Shops, consulting rooms and offices should not have a floor area cap be listed in Deemed-to-Satisfy (DTS) /DFP 1.4.
- The Flinders Village policies should be reflected in a "Flinders Village Sub-Zone".

We would appreciate the opportunity to discuss this matter with you to explore the possibilities of accommodating these needs in a more appropriate manner.

Yours sincerely



David Bills, RPIA
Associate Director