

Agenda Report for Decision

Meeting Date: 25 November 2021

Item Name	Advice to the Minister for Planning and Local Government – Riverbank Precinct Code Amendment
Presenters	Brett Steiner and Rhiannon Hardy
Purpose of Report	Decision
Item Number	3.2
Confidentiality	Not Confidential (Release Delayed) – to be released following final decision by the Minister on the Code Amendment. Anticipated mid-December 2021
Related Decisions	24 June 2021: Item 3.2 – Initiation Advice to the Minister – Riverbank Precinct Code Amendment

Recommendation

It is recommended that the State Planning Commission (the Commission) resolves to:

1. Approve the designation of this item as Not Confidential (Released Delayed). To be released following the final decision by the Minister for Planning and Local Government (the Minister) on the Code Amendment – anticipated mid-December 2021.
2. In response to consultation with the Commission by the Minister under section 73(10)(a) of the *Planning, Development and Infrastructure Act 2016* (the Act), approve and authorise the Chair of the Commission to sign the advice to the Minister.
3. Delegate to the Director, Planning and Development, Planning and Land Use Services, Attorney-General's Department (the Department), the power under section 74(3) of the Act to prepare a report on the Code Amendment and to furnish such report on the Minister to refer to the Environment, Resources and Development Committee (ERDC) of the Parliament of South Australia.
4. Authorise the Chair of the Commission to finalise any minor amendments to the advice and attachments as required.

Background

On 16 July 2021, the Minister initiated the Riverbank Precinct Code Amendment (the Amendment) (**Attachments 1 and 2**).

The Amendment was led by the Chief Executive of the Department (the Designated Entity), pursuant to section 73(2)(b)(i) of the Act.

The Commission had previously provided advice to the Minister on the Proposal to Initiate (**Attachment 3**).

On 15 September 2021, the draft Amendment (**Attachment 4**) was released for public consultation for a period of six weeks in accordance with the Engagement Plan (**Attachment 5**).

The Chief Executive has prepared an Engagement Report (**Attachment 6**) which:

- Details of the engagement undertaken and how that engagement met the Engagement Plan.
- The outcome of the engagement, including a summary of the written submissions and feedback received.
- Proposed changes to the proposal to amend the Planning and Design Code (when compared with the proposal that was engaged on) and the reasons for those proposed changes.
- Evaluation of the effectiveness of the engagement that considers whether the principles of the Community Engagement Chart (the Charter) have been achieved and whether all mandatory requirements identified have been met.

After being furnished the Engagement Report, the Minister has now consulted with the Commission on the Code Amendment in accordance with section 73(10)(a) of the Act because she considered the matter to be of significance (**Attachment 7**).

The purpose of this report is to seek the Commission's advice to the Minister in relation to the Amendment.

Delegation is also sought to prepare a report on the Amendment for the purposes of review by the ERDC in accordance with section 74(3) of the Act.

Discussion

Scope of the Amendment

The Amendment seeks to ensure any future development in the Adelaide Riverbank Precinct, such as the new Women's and Children's Hospital (nWCH), is well-managed, consistent and in keeping with the surrounding areas. The proposed changes will also help ensure the Riverbank Precinct's sporting, health, cultural, environmental and educational facilities are easy to access and well connected.

Engagement feedback

A total of 661 written submissions were received regarding the Amendment. A copy of these public submissions are attached to the Engagement Report.

The public feedback received on the Code Amendment is summarised in the Engagment Report (**Attachment 6**) and can be summarised as follows:

- Concern about development and environmental impacts, as well as impacts on both Kaurna and European heritage in the area.

- Concern about development of the new Women's and Children's Hospital (nWCH) and/or associated car park.
- Concern about potential future development in areas such as Kate Cocks Park, the olive grove, Pinky Flat/Tarntanya Wama and Adelaide Botanic High School.
- Concern about development of a new arena.
- Support/positive comments about developing an underutilised site.
- Support/positive comments related to the nWCH.

Seven responses from State agencies were also received in response to the Amendment, but these are not considered public submissions as they came from within the Government of South Australia. A summary of the key matters identified by these agencies is provided for the Commission's reference in **Attachment 8**.

Recommended Amendments in response to engagement

The Engagement Report (**Attachment 6**) sets out recommendations about how the Amendment is proposed to be altered in response to the feedback received. A summary of the changes is set out below:

- Remove the Riverbank Subzone, ensuring no change to existing development opportunities along the River Torrens/Karrawirra Pari and Pinky Flat/Tarntanya Wama.
- Retain the olive grove in Kate Cocks Park and land west of the Old Adelaide Goal in the Adelaide Park Lands Zone and a portion of Helen Mayo Park within the Adelaide Park Lands Zone, ensuring protection of a greater proportion of the park lands.
- Capping maximum building heights in the Health Subzone west of the railway line at six building levels.
- Including walking and cycling paths through the health and entertainment precincts in a new concept plan.
- Align the northern boundary of the Innovation Subzone with the Adelaide Botanic High School to recognise the cultural heritage values of the lands to the north.
- Provide greater clarity that residential development is not supported in the Riverbank Precinct.
- Change the subzone over the Helen Mayo North and South buildings to the Innovation Subzone, to ensure better integration with the innovation precinct.
- Require activation of the ground level of buildings with frontage to the River Torrens/Karrawirra Pari.
- Ensure development in the City Riverbank Zone recognises the significance of Karrawirra Pari/Riverbank precinct for traditional indigenous custodians, through authentic and clearly visible means.

The final Code Amendment instructions are provided in section 8 of the Engagement Report and describes how the Planning and Design Code is proposed to be amended as a result of the Amendment.

Community Engagement Charter

The engagement activities were undertaken in accordance with the Engagement Plan and in alignment with the following key principles of the Charter:

1. Engagement is genuine
2. Engagement is inclusive and respectful
3. Engagement is fit for purpose
4. Engagement is informed and transparent
5. Engagement processes are reviewed and improved.

The Engagement Plan sets out how the engagement was planned to satisfy these principles (**Attachment 5**).

Evaluation of the engagement was undertaken by an online survey sent to those who lodged a written submission or attended an information session. 25 per cent of respondents agreed that the engagement process genuinely sought their input to shape the proposal, while 33 per cent agreed that they were given an adequate opportunity to be heard. In addition, 25 per cent and 33 per cent of respondents provided a neutral response to each of these questions, respectively.

Full evaluation results are contained within the Engagement Report provided in **Attachment 6**.

Advice to the Minister

Based on the above information, the Commission may now wish to provide advice to the Minister. A draft response is provided in **Attachment 9** for the Commission's consideration. This draft response advises that:

- The Commission is of the view that the engagement complied with the principles, performance outcomes and mandatory requirements of the Charter.
- It is the Commission's view that the proposed Code Amendment, as varied in the Engagement Report, suitably aligns with the strategic directions of the State Planning Policies and *The 30 Year Plan for Greater Adelaide: 2017 Update*.
- The Commission is satisfied that the changes proposed to the Code Amendment in response to feedback received through the engagement process demonstrates an appropriate balance between addressing the concerns raised while providing for the key strategic outcomes of the Code Amendment to be realised.

As a result of the current evolution of conceptual plans for the transit hub (car park) associated with the nWCH, SA Health has advised that the extent of rezoning shown in the Chief Executive's Engagement Report (Map A and Map B in Attachment 2 – Zone and Subzone Amendments – Health) may not capture the entirety of the proposed transit hub structure within the City Riverbank Zone and Health Subzone. Accordingly, a portion of the transit hub structure may encroach within the Adelaide Park Lands Zone (which is proposed to be expanded). This has arisen from more detailed design, which has created a better interface with the Park Lands, improved pedestrian linkages, and a better relationship to the adjacent heritage listed Gaol.

Such a change would provide procedural clarity in any future development application for the nWCH (ensuring the development does not straddle two different zones). On 22 November 2021, SA Health wrote to the Commission requesting that the zone/subzone boundary of the City Riverbank Zone/Health Subzone between the Thebarton Police Barracks and the Old Adelaide Gaol is realigned to be perpendicular with the northern boundary of the Barracks instead of angled (**Attachment 10**). Consequential amendment to proposed Concept Plan 125 – City Riverbank West in Attachment 5 of the Engagement Report would also be required to ensure it is consistent with the revised transit hub plans for the nWCH.

This outcome would still be consistent with the response to public submissions (and overall position taken in the Engagement Report) with regard to retention of the olive grove part of Kate Cocks Park in the Adelaide Park Lands Zone (rather than its inclusion in the City Riverbank as consulted on).

A map in **Attachment 11** illustrates the recommended change.

Next steps

Should the Amendment be approved by the Minister, the Commission will be required to provide a report on the Code Amendment for review by the ERDC in accordance with section 74(3) of the Act. This report will be furnished on the Minister, who is then required to provide the report to the ERDC within 28 days of the Amendment taking effect. Delegation is sought for this report to be prepared by the Director, Planning and Development, on behalf of the Commission to ensure the legislated time frames are met.

Attachments:

1. Proposal to Initiate Riverbank Precinct Code Amendment – approved 16 July 2021 (#17397076).
2. Letter from the Minister to the Chief Executive, 16 July 2021 – initiation of the Riverbank Precinct Code Amendment (#17397079).
3. State Planning Commission advice to the Minister – initiation of the Riverbank Precinct Code Amendment, 29 June 2021 (#18015880).
4. Draft Riverbank Precinct Code Amendment – for consultation (#17642150).
5. Engagement Plan – Riverbank Precinct Code Amendment (#17642151).
6. Engagement Report – Riverbank Precinct Code Amendment, signed 18 November 2021 (including public submissions) (#18037428).
7. Letter from the Minister consulting the State Planning Commission on the Riverbank Precinct Code Amendment, 18 November 2021 (#17960808).
8. Summary of State agency feedback on the Riverbank Precinct Code Amendment (#18016051).
9. Draft State Planning Commission advice to the Minister on the Riverbank Precinct Code Amendment (#18011398).
10. Letter from Mr Brendan Hewitt, SA Health – 22 November 2021 (#18047584).
11. City Riverbank Zone – Alignment with Transit Hub (#18033203).

Prepared by: Andrew Mitchell

Endorsed by: Anita Allen

Date: 23 November 2021

The Hon Vickie Chapman MP



**Government
of South Australia**

Deputy Premier

Attorney-General

**Minister for Planning
and Local Government**

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2021/05852/02

18 November 2021

Mr Craig Holden
Chairperson
State Planning Commission

By email: saplanningcommission@sa.gov.au

Dear Mr Holden

I refer to the Riverbank Precinct Code Amendment (the Amendment) by the Chief Executive of the Attorney-General's Department (Designated Entity for the Amendment).

The Amendment seeks to ensure any future development in the Adelaide Riverbank Precinct, such as the new Women's and Children's Hospital, is well-managed, consistent and in keeping with the surrounding areas. The proposed changes will also help ensure our sporting, health, cultural, environmental and educational facilities are easy to access and well connected.

The draft Amendment was released for public consultation for a period of six weeks from 15 September 2021 to 27 October 2021. 661 written submissions were received on the Amendment.

The Chief Executive has now prepared an Engagement Report and furnished a copy of the report to me.

Section 73(10) of the *Planning, Development and Infrastructure Act 2016* (the Act) states that I may, after receiving a copy of the Engagement Report, consult the State Planning Commission (the Commission) if I consider the matter to be of significance.

The Riverbank Code Amendment is a significant policy proposal that has generated a high level of interest across a range of stakeholder groups. Given its importance, I wish to seek the advice of the Commission on the Amendment.

As such, please find attached the Chief Executive's engagement plan and engagement report to inform this advice. Upon receipt of the Commission's advice, I will consider whether to adopt, alter, divide into parts, or not proceed with the Amendment under section 73(10)(c) of the Act.

I await the Commission's response.

Yours sincerely



VICKIE CHAPMAN MP
DEPUTY PREMIER
MINISTER FOR PLANNING AND LOCAL GOVERNMENT

Att: Engagement Plan - Riverbank Precinct Code Amendment
Engagement Report - Riverbank Precinct Code Amendment

Summary of State Agency feedback on the Riverbank Precinct Code Amendment

SA Tourism Commission

- Provides in-principle support for the Code Amendment as it will create an enabling environment that will support tourism and other small businesses to grow and enable the full potential of the Riverbank Precinct to be realised.

SAPOL

- Does not object to the Code Amendment on the proviso that existing police use provisions for occupancy at the Barracks continue, including ability for future SAPOL redevelopment of the site.
- Notes that the rezoning of the Barracks and surrounding area to a Biomedical Precinct (and construction of the NWCH and associated car park) is expected that to negatively impact SAPOL's operations at the Barracks but that discussions are underway with SA Health in relation to these matters.

State Aboriginal Heritage Committee (Department of Premier and Cabinet)

- Provides details of several Aboriginal historical / archaeological / cultural sites that intersect with many of the areas subject to policy change through the Code Amendment.
- Acknowledges that areas such as Pinky Flat were important places of historical Kurna occupation.
- Opposes the Code Amendment on the basis that it has the capacity to impact on undisturbed Kurna heritage.

Green Adelaide Board (Department of Environment and Heritage)

- Recommends full, respectful and honest consultation with the Kurna Yerta Aboriginal Corporation prior to any formal decisions being made regarding the Code Amendment.
- Recommends that the proposed extension of the Health Subzone be restricted to the current footprint of the proposed transit hub / car park associated with the nWCH.
- Does not support the proposed Riverbank Subzone (and potential for on-water development) as it will negatively impact riparian vegetation and aquatic plants.
- Seeks strengthening of policy to increase and enhance biodiversity and environmental outcomes.

Department for Environment and Water

- Submission highlights the large number of State Heritage Places affected by the Code Amendment.
- Does not support the application of the Health Subzone to the area around the Police Barracks and Gaol as it considers that this will overly restrict future adaptive reuse opportunities of both State Heritage Places
- Also concerned about proposed scale and height of development in the proposed Health Subzone.

- Highlights that the SA Heritage Council is currently proposing to designate the Adelaide Park Lands and City Layout as a State Heritage Area.
- Concerns expressed about the proposed Riverbank Subzone from the perspective of potential impacts on riparian vegetation and the continuous river corridor in the areas affected.
- Supports the proposed changes to the Innovation Subzone.

South Australian Heritage Council

- Submission contends that there is no overriding need to change the existing zoning for the Adelaide Riverbank Precinct as proposed.
- Considers that the intent of the Code Amendment is contrary to the National heritage listing of the Adelaide Park Lands and City Layout.
- The Code Amendment allows significant development opportunities, alienating large swathes of public Park Lands, without the strategic guidance of an overall Master Plan.
- The Council has recommended to the Minister for Planning and Local Government that the Adelaide Park Lands be declared a State Heritage Area – the Code Amendment could adversely affect this proposal.
- Recommended that appropriate consultation occur with Kaurna elders / representatives given the significance of the area for traditional peoples.
- Various comments made in relation to each of the Precincts subject to the Code Amendment with little or no support given for any of the proposed changes to Subzone – including the creation of a new Subzone in the Adelaide Park Lands Zone.

Department for Infrastructure and Transport

- Notes that relevant transport assessment / studies should be undertaken at the development application stage for any development in the areas subject to the Code Amendment to understand any future land use implications on State transport networks.

18011398



7 December 2021

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Hon Josh Teague MP
Minister for Planning and Local Government

By email: AttorneyGeneral@sa.gov.au

Dear Minister

Riverbank Precinct Code Amendment by the Chief Executive, Attorney-General's Department

On 18 November 2021, the former Minister for Planning and Local Government, the Hon Vickie Chapman MP, wrote to the State Planning Commission (the Commission) regarding the Riverbank Precinct Code Amendment (the Code Amendment) by the Chief Executive of the Attorney-General's Department (the Designated Entity) pursuant to section 73(10) of the *Planning, Development and Infrastructure Act 2016* (the Act).

The Commission has reviewed the Engagement Plan and Engagement Report prepared for the Code Amendment and has considered the changes proposed by the Chief Executive in response to the engagement feedback.

The Commission is of the view that any amendment to planning policy which may impact on the Adelaide Park Lands (the Park Lands) should be carefully considered. The Park Lands have a rich history, both as a cultural site and gathering place for the Kaurna people, and more recently, as an example of early planning innovation. This has provided Adelaide with one of the world's great urban parklands and the legacy of having the world's first and only planned city in a park.

In addition to the rich history and cultural significance, the Park Lands also provide important environmental, amenity and health benefits to Adelaide's centre. Therefore, serious consideration should be given to retention of Park Lands wherever possible, including options to maximise the retention of green space.

The Commission appreciates that striking the right balance between establishing the Riverbank as a world-renowned health, entertainment, sporting, educational and biomedical precinct while also protecting the Park Lands for recreation and open space is challenging. There is no doubt that investment in the Riverbank over the last decade has provided significant public benefit and has supported public participation in recreation, arts, cultural and sporting events. It has also played a critical role in supporting significant investment and growth in the State in key industries such as tourism, biomedical research, space, defence and technology.

The Commission also appreciates that feedback received through the engagement process demonstrates that some people are looking to the Code Amendment to safeguard against decisions about land management, investment and tenure. While these matters cannot be addressed through the Planning and Design Code (the Code), the Commission has had regard to the broader goals for the Park Lands that have been expressed by the City of Adelaide and the Adelaide Park Lands Authority (APLA) relating to land management and tenure, such as the goal of avoiding overall increases in the built form footprint. In this context, the role of the Code Amendment is to provide an assessment framework for built form proposals, but not to seek to govern land tenure, land management, or to trade off built form footprint changes across different areas.

To assist you in considering these complex matters, the Commission provides the following further advice for your consideration.

Firstly, the Commission supports a number of amendments proposed by the Chief Executive in response to engagement feedback. In particular:

- The introduction of a concept plan that will improve pedestrian and cyclist connections between the Park Lands, Riverbank and Adelaide CBD, and clarify expected building heights for development north of Gaol Road.
- New policy in the Entertainment Subzone to encourage active ground level land uses and design techniques to achieve greater activation along the Riverbank, improving safety and encouraging public use.
- Greater recognition of Kaurna culture through additional policy to recognise the Indigenous connection to country and removal of key cultural sites, such as Pinky Flat, from the proposed Amendment.
- Removal of the Riverbank Subzone from the proposed Amendment so there is no change to policy along the River Torrens waterfront.

The Commission supports the ambition for expansion of the entertainment precinct in a way that activates the River Torrens' waterfront and provides greater opportunities for underutilised land. The Commission appreciates that proposed policy in the Entertainment Subzone seeks 'a transition in scale down from North Terrace to the river' and 'complements the scale of development on the eastern side of Montefiore Road'.

However, the Commission is of the view that the Code Amendment should go further to protect the natural waterfront environment along the River Torrens by encouraging future building footprints to develop further south, ensuring suitable transition to the natural environment of the River Torrens and enabling use of the airspace above the railway.

The Commission recommends that the Minister consider additional changes to the Amendment that address the following matters:

1. Ensure development maintains a setback from the River Torrens to maintain the natural waterfront edge and its walking/cycling connections, linking into the waterfront setting to the east. It is recommended this is achieved by either:

- a) Reducing the northern extent of the proposed City Riverbank Zone and Entertainment Subzone (i.e. leaving lot 201 in the Adelaide Park Lands Zone); or
 - b) Amending proposed 'Concept Plan 125 – City Riverbank – West' to clearly nominate the green corridor adjacent the River Torrens as landscaping or open space.
2. Encourage additional opportunities to utilise the airspace over the railway by expanding the Entertainment Subzone south over the railway yards (replacing the current Health Subzone).

The Commission is supportive of amendments to the Code to facilitate the new Women's and Children's Hospital (nWCH), particularly those which strengthen pedestrian/cyclist connections throughout the precinct and in to Bonython Park. It is also important that the design response respects the heritage values of the Old Adelaide Gaol and Thebarton Police Barracks. This should be done in a manner which maximises the retention of green space within the health and bio-medical precinct.

Currently, these sites have a high proportion of hardstand and provide limited community access. Adaptive reuse of these sites has the potential to improve community access to the Park Lands and increase green space providing those future uses are carefully considered and well designed.

The Health Subzone should define the types of land uses which are appropriate in the subzone to support health-related land uses, particularly when considering the adaptive reuse potential of the Old Adelaide Gaol and Thebarton Police Barracks.

Following a request from SA Health, the Commission understands that the extent of the Health Subzone/City Riverbank Zone shown in the Chief Executive's Engagement Report may lead to a small portion of the car park structure associated with the nWCH encroaching into the Adelaide Park Lands Zone. The Commission supports amendment to address this matter, providing more flexibility for the nWCH as the design response evolves, and to enable a more positive interface with the Adelaide Park Lands, stronger relationship to the State heritage listed Old Adelaide Gaol, and improved pedestrian connectivity.

Accordingly, the Commission recommends that the Minister also considers the following amendments:

3. Increase the proportion of land identified for green space by:
 - a) Altering the proposed 'Concept Plan 125 – City Riverbank – West' to nominate green space around the Old Adelaide Gaol (e.g. land west of the railway line and north of Gaol Road nominated as landscaping or open space, except where currently covered by buildings); or
 - b) Reducing the northern and eastern extent of the proposed City Riverbank Zone and Health Subzone (e.g. leaving the northern and eastern portions of section 549 in the Adelaide Park Lands Zone that currently comprise green space).

4. Realign the zone/subzone boundary of the City Riverbank Zone/Health Subzone between the Thebarton Police Barracks and the Old Adelaide Gaol (and undertake any consequential amendments to Concept Plan 125) to be perpendicular with the northern boundary of the Barracks instead of angled, to provide more flexibility for the nWCH as the design response evolves.

Finally, the Commission recommends that the Minister consider changes that more clearly protect the green space around the pedestrian link between Frome Road and the Adelaide Botanic Gardens:

5. Amend 'Concept Plan 85 – City Riverbank – Innovation' to nominate land surrounding and south of the Frome Road – Adelaide Botanic Gardens Open Space Link as part of the Adelaide Park Lands Trail.

In relation to procedural matters, the Commission has formed the view that the engagement undertaken by the Chief Executive complied with the principles, performance outcomes and mandatory requirements of the Community Engagement Charter, and other requirements identified in the Act and *Practice Direction – 2 Preparation and Amendment of Designated Instruments*.

The Commission is also satisfied that the changes proposed to the Code Amendment in response to feedback received through the engagement process demonstrates an appropriate balance between addressing the concerns raised while providing for the key strategic outcomes of the Code Amendment to be realised, subject to the recommendations described above.

If you would like any further information, or wish to discuss this matter in person, please do not hesitate to contact me via mobile on [REDACTED]. I trust this information is of assistance in your deliberations.

Yours sincerely



Craig Holden
Chair

In reply please quote:

Doc No: A3201121
File No: 2018-12775



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Mr Craig Holden
Chair, State Planning Commission
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Dear Mr Holden

RE: Riverbank Precinct Code Amendment Advice

The Riverbank Precinct Code Amendment has been prepared, in part, to support the new Women's and Children's Hospital (nWCH) which has been sited to maximise the benefits of co-location with the Royal Adelaide Hospital. Through the consultation process on the Code Amendment, and in response to Council, community and stakeholder feedback, the concept has naturally evolved to improve the overall design approach.

In particular, recent coordination with the City of Adelaide and Adelaide City Council has resulted in a modified design for the western precinct from that shown in the nWCH Master Plan, dated June 2021.

The new concept design delivers a number of community benefits, including:

- A minimisation of the impact to Park Lands through reducing the built form footprint by over 40%;
- Greater public amenity within the Park Lands;
- A more sensitive approach to heritage and the environment;
- Improved public access to and from the Park Lands;
- Activation of bike and pedestrian pathways; and
- No net loss of Park Lands under City of Adelaide custodianship.

As part of our collaboration with Planning and Land Use Services, it has been brought to our attention that the Code Amendment Engagement Report has recommended adjustments to the Riverbank Zone and associated Health subzone to reduce the overall impact on the Adelaide Park Lands, which we support in principle.

However, the proposed zone/subzone boundary amendment has inadvertently impacted on the current design approach which will encroach into the proposed Park Lands boundary.

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Accordingly, I request that the zone/subzone boundary of the City Riverbank Zone/Health Subzone between the Thebarton Police Barracks and the Old Adelaide Gaol be realigned to be perpendicular with the northern boundary of the Barracks instead of angled, as outlined in Attachment 1.

I understand that a consequential amendment to proposed Concept Plan 125 – City Riverbank West in Attachment 5 of the Engagement Report will also be required to ensure it is consistent with the revised nWCH western precinct plans.

The adjustment as described is supported by PLUS. I note that PLUS has advised that this realignment is consistent with the response to public submissions (and overall position taken in the Engagement Report) with regard to retention of the olive grove part of Kate Cocks Park in the Adelaide Park Lands Zone (rather than its inclusion in the City Riverbank as consulted on).

Yours sincerely



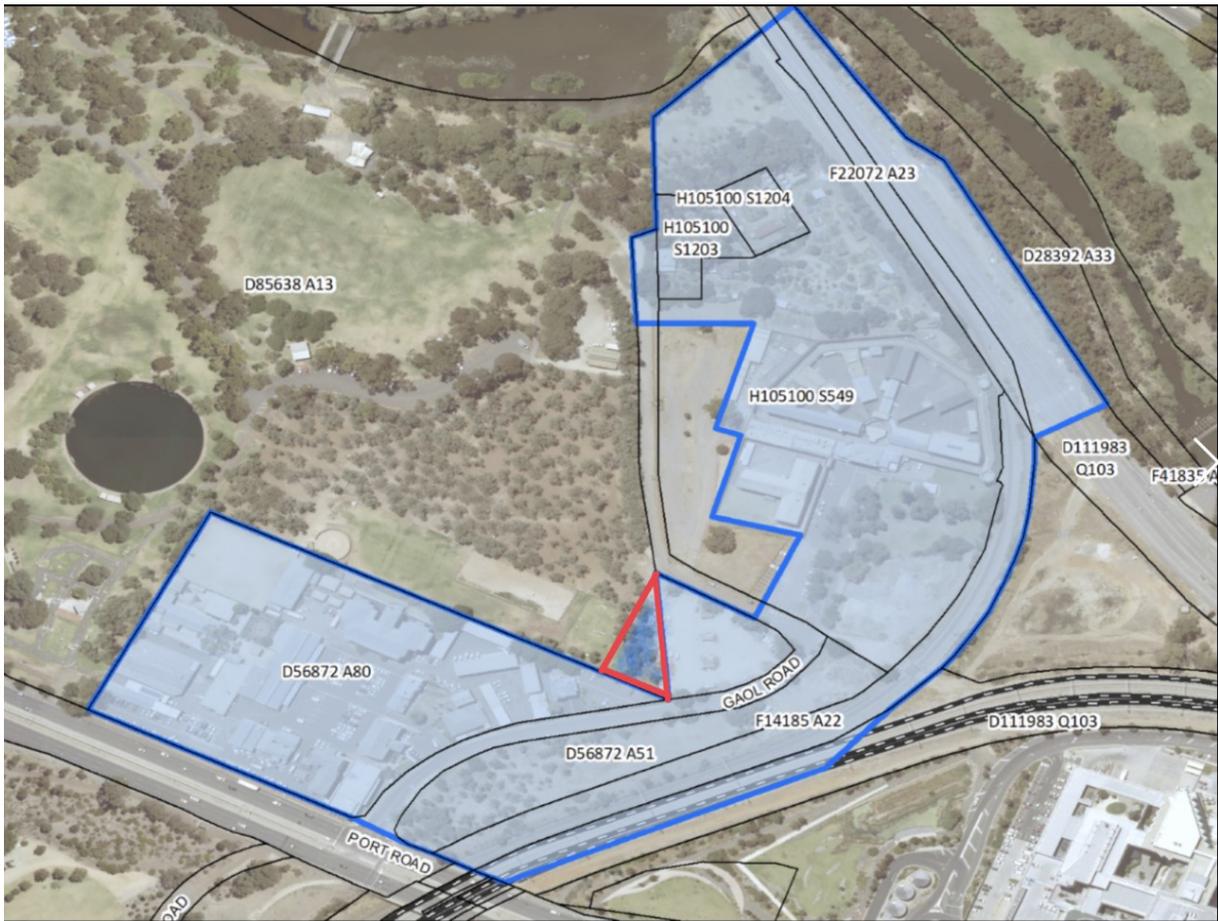
BRENDAN HEWITT
Project Director, nWCH Project
Executive Director, Infrastructure

22 /11/2021

Att Proposed Health zone/subzone adjustment

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ATTACHMENT 1



Proposed Health zone/subzone adjustment outlined in red.