

## Adelaide Park Lands Preservation Association, Inc.

[www.adelaide-parklands.asn.au](http://www.adelaide-parklands.asn.au)  
[secretary@adelaide-parklands.asn.au](mailto:secretary@adelaide-parklands.asn.au)

c/o BK Partners Pty Ltd  
Chartered Accountants  
P.O. Box 4053, Norwood South SA 5067

Patron: Rev Dr Lynn Arnold AO

ABN 19 706 384 386

David Speirs MP  
Minister for Environment and Water  
GPO BOX 1047  
Adelaide SA 5001

Dear Minister Speirs

### Heritage Listing for Adelaide Park Lands

I am writing to you at an historic cross-roads in the history of the world's first public parks. It is a cross-roads which gives you the opportunity to make a decision, in 2019, that should be celebrated for generations to come.

A decade after the Adelaide Park Lands received *National* Heritage listing, the State Heritage Council resolved on 6 December 2018 to recommend that the Park Lands should also be acknowledged as a *State* Heritage Area.

We understand that the Heritage Council has written (or will soon write) to you, urging you to recommend to your colleague the Minister for Planning that the Park Lands be identified as a Heritage Area within the Adelaide City Development Plan.

The recommendation was made by the Heritage Council after receiving a comprehensive assessment, by a contracted consultant, of the match between the Park Lands and the statutory criteria for heritage listing. A process of public consultation in 2017 also featured a record number of public submissions in support of State Heritage listing.

The recommendation coincides with recent initiatives by the Park Lands Authority to investigate the potential for World Heritage listing. A paper prepared for a Park Lands Authority meeting in October 2018 estimated that World Heritage listing of the Park Lands would lead to a 20 to 30 per cent boost in tourism to Adelaide.

Among the arguments to support World Heritage listing are the little-known fact that the Adelaide Park Lands, established in 1837, were the world's first public park (10 years ahead of the next public park in Merseyside, England); and in 2019 Adelaide is still the only city in the world that is garlanded by Parks.

I encourage you to act upon the Heritage Council's recommendation by recommending to the Minister for Planning the recognition of the Adelaide Park Lands as a State Heritage Area within the Adelaide City Development Plan under the *Development Act 1993*.

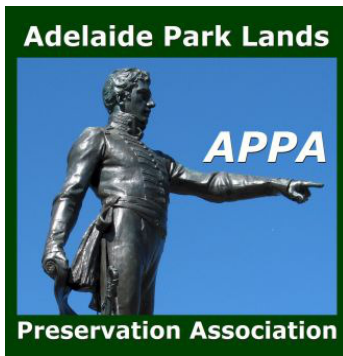
Yours sincerely

A handwritten signature in blue ink, appearing to be 'John S.', written over a light grey rectangular background.

28 December 2018

cc:

- Rachel Sanderson, MP, (Member for Adelaide)
- Susan Close, MP, Shadow Minister for Environment and Water
- Lord Mayor, Sandy Verschoor



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Patron: Rev Dr Lynn Arnold AO

ABN 19 706 384 386

Stephan Knoll MP  
Minister for Transport, Infrastructure and Local Government  
Roma Mitchell House  
PO Box 1533  
Adelaide SA 5001

Dear Mr Knoll

### Heritage Listing for Adelaide Park Lands

I am writing to you at an historic cross-roads in the history of the world's first public parks. It is a cross-roads which gives you the opportunity to make decisions, in 2019, that should be celebrated for generations to come.

I wrote to you on 9 April 2018 and again on 15 July 2018. I have not received a reply (other than a brief acknowledgement) to either of those letters although I did have a meeting with your advisor Cameron Henderson on 24 September 2018.

As I anticipated in my letter to you of 9 April and in my meeting with Mr Henderson, after a delay of more than nine years, the Heritage Council on 6 December 2018 finally recommended that the Adelaide Park Lands be formally recognised as a State Heritage Area.

This complements the existing National Heritage listing, which was achieved in 2008. It is also consistent with recent initiatives by the Park Lands Authority to investigate the potential for World Heritage listing. A paper prepared for a Park Lands Authority meeting in October 2018 estimated that World Heritage listing of the Park Lands would lead to a 20 to 30 per cent boost in tourism to Adelaide.

Among the arguments to support World Heritage listing are the little-known fact that the Adelaide Park Lands, established in 1837, were the world's first public park (10 years ahead of the next public park in Merseyside, England); and in 2019 Adelaide is still the only city that is garlanded by Parks.

I believe that the Heritage Council has conveyed its recommendation to your colleague the Minister for Environment and Water, David Speirs MP, to whom the *Heritage Places Act 1994* is committed.

It is expected that Mr Speirs will soon write to you, recommending that you reflect the Heritage Council's recommendation with an appropriate Ministerial amendment to the City of Adelaide Development Plan under the *Development Act 1993*.

Consistent with my letter to you of 9 April 2018 this represents an excellent opportunity for you to respond positively, by:

1. Making such a Ministerial Development Plan amendment; and
2. Announcing the Government's co-operation with the Adelaide City Council in examining a bid for potential World Heritage Listing of the Park Lands; and
3. Commissioning a review of the *Adelaide Park Lands Act 2005*. As I suggested on 9 April, a review of this Act should at least aim to:
  - insert a specific amendment to prevent further accumulation of Park losses; and
  - strengthen current ineffectual Park Lands return provisions.

The Adelaide Park Lands Preservation Association would be delighted to work with you and with the City of Adelaide to assist in realising these historic opportunities.

Yours sincerely



Shane Sody  
President

28 December 2018

cc:

- Rachel Sanderson, MP, (Member for Adelaide)
- Tony Piccolo, MP, Shadow Minister for Planning and Local Government
- Lord Mayor, Sandy Verschoor, Town Hall, Adelaide



Government  
of South Australia

The Hon Stephan Knoll MP  
Member for Schubert

19MPL0007

Mr Shane Sody  
President  
Adelaide Park Lands Preservation Association, Inc.  
C/O - KB Partners Pty Ltd  
Chartered Accountants  
PO Box 4053  
NORWOOD SA 5067

*Shane*  
Dear Mr Sody

Thank you for your letter regarding the recommendations of the Heritage Council to recognise the Adelaide Park Lands as a State Heritage Area and your request for a number of actions to be undertaken, including a Ministerial Development Plan Amendment.

I am advised that the Minister for Environment and Water, the Hon David Speirs MP, is currently considering the proposal.

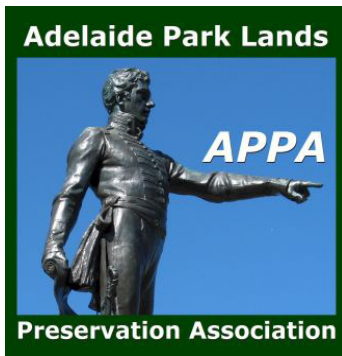
Once I have received advice on the State Heritage listing process from the Minister for Environment and Water, I will be in a position to further consider this matter, and I will provide a more detailed response to your proposal.

I trust this information is of assistance.

Yours sincerely

**HON STEPHAN KNOLL MP**  
**MINISTER FOR TRANSPORT, INFRASTRUCTURE AND LOCAL GOVERNMENT**  
**MINISTER FOR PLANNING**

17 April 2019



## Adelaide Park Lands Preservation Association, Inc.

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ABN 19 706 384 386

David Speirs MP  
Minister for Environment and Water  
GPO BOX 1047  
Adelaide SA 5001

Dear Minister Speirs

### Heritage Listing for Adelaide Park Lands

I am writing to follow up on the enclosed letter, which was sent on 28 December 2018. It appears we have received no reply to this correspondence.

We have received correspondence from the Minister for Planning, the Hon Stephan Knoll (24 April 2019, enclosed) confirming that he is awaiting a recommendation from you on this matter.

Our nomination of the Park Lands for State Heritage listing was made 10 years ago, in 2009. The continued delay in dealing with this matter seems perplexing.

The Adelaide City Council has approved \$100,000 in the current year's budget to investigate the possibility of pursuing World Heritage listing for the Park Lands.

We are hoping that the recommendation from the Heritage Council, for State Heritage recognition, on 6 December 2018, will be acted upon without further delay.

Yours sincerely  
Shane Sody, President

26 August 2019

cc:

- Rachel Sanderson, MP, (Member for Adelaide)
- Susan Close, MP, Shadow Minister for Environment and Water
- Lord Mayor, Sandy Verschoor

18EW0003559



**Government  
of South Australia**

**Office of the Minister for  
Environment and Water**

81-95 Waymouth Street  
Adelaide SA 5000

GPO Box 1047  
Adelaide SA 5001

Tel 08 8463 5680  
minister.speirs@sa.gov.au

Mr Shane Sody  
President  
Adelaide Park Lands Preservation Association, Inc  
Email: [secretary@adelaide-parklands.asn.au](mailto:secretary@adelaide-parklands.asn.au)

Dear ~~Mr Sody~~ *Shane*

Thank you for your email expressing support for the state heritage recognition of the Adelaide Park Lands. I apologise for the delay in responding.

I acknowledge the work of the Adelaide Park Lands Preservation Association in its role of advocating for one of Adelaide's most unique assets.

The inclusion of the Adelaide Park Lands and City Layout in the National Heritage List in 2008 is clear recognition that our park lands demonstrate a well-considered urban landscape design.

As you are aware, the state government commissioned a comprehensive assessment of the Adelaide Park Lands, Squares and City Layout in 2017, to inform suitability assessments against the statutory criteria under the *Heritage Places Act 1993*. I understand this process received considerable community support.

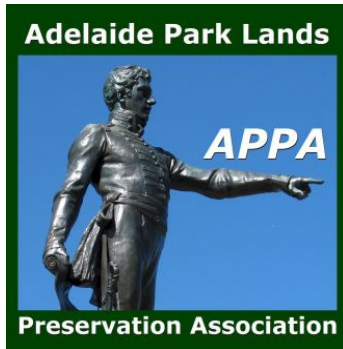
As a measure to progress this initiative, I intend to raise the matter of state heritage recognition for the Adelaide Park Lands with the Minister for Planning.

Thank you for writing to me and your commitment to the protection and conservation of our park lands.

Yours sincerely

  
**DAVID SPEIRS MP**  
Minister for Environment and Water

Date: *19/09/2019*.



## Adelaide Park Lands Preservation Association, Inc.

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*Patron: Rev Dr Lynn Arnold AO*

ABN 19 706 384 386

David Speirs MP  
Minister for Environment and Water  
GPO Box 1047  
Adelaide SA 5001

Dear Minister Speirs

### **Your Action needed for State Heritage Listing of the Adelaide Park Lands**

I am writing to follow up on your letter of 19 September 2019 (Your ref: 19EW0003559), requesting your action to ensure the Adelaide Park Lands become State Heritage listed.

As you would be aware, the Adelaide Park Lands and City Squares were nominated for State heritage listing in 2009. After eight years of delay, a State heritage assessment of the Adelaide Park Lands and City Squares finally began in April 2017. A period of public consultation occurred from June to September 2017. 1,747 people responded to a public survey. Of these respondents:

- 97% agreed that the Adelaide Park Lands were important to them, and
- 88% thought that the Adelaide Park Lands should be State heritage-listed.

A heritage assessment report was delivered to the South Australian Heritage Council (SAHC) in May 2018. The assessment is a comprehensive 91-page document that examines the history, features, and values of the Park Lands. Not surprisingly, the independent assessment found that the Park Lands meet not just one, but most of the legal criteria for State Heritage recognition.

The report was considered by the SAHC on 6 December 2018, after which the SAHC recommended to you, that you consider listing the Adelaide Park Lands as a State Heritage Area.

On 24 April 2019, the Minister for Planning, the Hon Stephan Knoll advised that he was awaiting a recommendation from you on this matter. On 19 September 2019 you advised that you intended "to raise the matter with the Minister for Planning." However, I am led to believe that this has not yet occurred.

It is very disappointing that for more than 18 months, there appears to have been no action or any further information provided to the public on this matter. The 1,747 people who responded to the Government's survey should be advised what action, if any, will be taken on the SAHC's recommendation.



The continued delay in dealing with this matter over more than ten years is perplexing, particularly in the context of existing National Heritage recognition and the City of Adelaide's current aspiration for World Heritage listing of the area.

Could you please let us know your next steps and time table for securing State Heritage recognition for our Park Lands?

Yours sincerely  
Shane Sody, President



*30 June 2020*

cc:

- Rachel Sanderson MP (Member for Adelaide)
- Susan Close MP (Shadow Minister for Environment and Water)
- Sandy Verschoor (Lord Mayor, and Chair of Adelaide Park Lands Authority)



**Government  
of South Australia**

**Office of the Minister for  
Environment and Water**

81-95 Waymouth Street  
Adelaide SA 5000

GPO Box 1047  
Adelaide SA 5001

Tel 08 8463 5680  
minister.speirs@sa.gov.au

20EW0009746

Mr Shane Sody  
President  
Adelaide Park Lands Preservation Association Inc.  
Email: [shane.sody@gmail.com](mailto:shane.sody@gmail.com)

Dear Mr Sody

Thank you for your letter dated 30 June 2020 regarding the status of the proposal to recognise the heritage significance of the Adelaide Park Lands.

As I indicated to you in my letter on 19 September 2019, I have written to the Minister for Planning regarding the establishment of the Adelaide Park Lands as a State Heritage Area.

The Planning Minister has subsequently advised that to support such a proposal, an appropriate first step would be to consider that any existing Conservation Management Plan (CMP) for the Adelaide Park Lands (and any associated guidelines) be updated, particularly to provide clarity around what types of 'development' would or would not require development applications and subsequent referral to me as the Minister responsible for the *Heritage Places Act 1993*.

As you are aware the state government is currently undertaking an extensive reform of South Australia's planning system by transitioning the *Development Act 1993* to the *Planning Development and Infrastructure Act 2016* (PDI Act). As such, it is accepted that any planning policy amendment to establish the Adelaide Park Lands as a State Heritage Area is unlikely to occur until the full implementation of the PDI Act, and its associated Planning and Design Code.

I am informed that though there is not currently a CMP for the Adelaide Park Lands, a number of related investigations/reports have been recently completed, which can contribute to a CMP. This together with further supplementary analysis will inform any amendments to planning policy for the Adelaide Park Lands and provide the Planning Minister with the information required to make a decision on whether or not to progress the proposal.

For further information regarding this matter, please contact Beverley Voigt, Manager Heritage South Australia within the Department for Environment and Water on [beverley.voigt@sa.gov.au](mailto:beverley.voigt@sa.gov.au) or 8124 4760.

Thank you for writing to me and I trust this information is of assistance.

Yours sincerely

**DAVID SPEIRS MP**  
Minister for Environment and Water

Date: 30/07/2020

cc: Hon Rachel Sanderson MP, Member for Adelaide  
Hon Susan Close MP, Member for Port Adelaide  
Lord Mayor Sandy Verschoor, City of Adelaide



Shane Sody &lt;shane.sody@gmail.com&gt;

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**20EW0009746: Letter from the Minister for Environment and Water [DLM=For-Official-Use-Only]**

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**Shane Sody** <shane.sody@gmail.com>  
To: [beverley.voigt@sa.gov.au](mailto:beverley.voigt@sa.gov.au)  
[REDACTED]

3 August 2020 at 11:45

Dear Ms Voigt

Please see the attached letter from the Minister in which he suggests further inquiries should be directed to you,

The Minister refers to correspondence he has received from the Minister for Planning on this matter.

He advises that the view of the Planning Minister is that it would be an "appropriate first step" to have a Conservation Management Plan (CMP) for the Adelaide Park Lands.

Would you please share with us the correspondence on this matter from the Planning Minister to the Environment Minister?

The Minister's letter to me does not indicate the legislative basis for the view that a CMP would be an "appropriate first step", nor who has legislative responsibility for preparing such a plan.

Can you please advise?

Kind regards

Shane Sody  
**President**  
Adelaide Park Lands Preservation Association.  
[www.adelaide-parklands.asn.au](http://www.adelaide-parklands.asn.au)



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**20EW0009746 Sody.pdf**  
152K



Shane Sody &lt;shane.sody@gmail.com&gt;

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**20EW0009746: Letter from the Minister for Environment and Water [DLM=For-Official-Use-Only]**

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Voigt, Beverley (DEW) <Beverley.Voigt@sa.gov.au>  
To: Shane Sody <shane.sody@gmail.com>  
Cc: "Angas, Hamish (DEW)" <Hamish.Angas@sa.gov.au>

4 August 2020 at 12:44

**For Official Use Only**

Dear Mr Sody

Thank you for your email, dated 3 August 2020, regarding the next steps to recognise the heritage value of the Adelaide Park Lands at a State level.

At the outset I am not at liberty to share with you any correspondence between the former Minister for Planning and the Minister for Environment and Water.

In answer to your main question, there is no legislative basis for the view that a Conservation Management Plan (CMP) would be an "appropriate first step", it is purely a means to an end. It was, from what I understand, the process by which the last State Heritage Area was progressed for Mount Torrens, back in 2002. Heritage South Australia wishes to facilitate a streamlined process for the Adelaide Park Lands to be established as a State Heritage Area (SHA). Based on the response of the former Minister for Planning, who ultimately makes this decision, we accept that defining the planning policy considerations, prior to the SHA designation, is now a necessary "first step".

As expressed in the Minister's letter to you, in order to create a State Heritage Area for the Adelaide Park Lands, the Planning Minister will need to alter the planning policy for the Park Lands, by undertaking a Code Amendment to the new Planning and Design Code (under the provisions of the *Planning Development and Infrastructure Act 2016*). Though the State heritage values of the Adelaide Park Lands have been determined and agreed upon by the SA Heritage Council, there is no appropriate document that sets out how those values are going to be protected and managed into the future. In accordance with the Australia ICOMOS' *Charter for Places of Cultural Significance* (The Burra Charter), a CMP is generally the document that describes the management of places/areas of heritage value. Whilst we acknowledge that a CMP normally follows the listing, in this case the CMP will be done prior and will inform to what extent the planning policy for the Adelaide Park Lands needs to be updated/revised, so as to protect and manage the State heritage values of the Adelaide Park Lands.

As the State's principal heritage agency, Heritage South Australia, in partnership with the City of Adelaide, will take the responsibility for preparing such a CMP.

Should you require any further advice, please do not hesitate to contact me again.

Regards  
Bev

Manager, Heritage SA



Shane Sody <shane.sody@gmail.com>

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## Progress on State Heritage Listing of the Adelaide Park Lands?

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**Shane Sody** <shane.sody@gmail.com>

1 March 2021 at 10:39

To: [beverley.voigt@sa.gov.au](mailto:beverley.voigt@sa.gov.au)

Cc: [Redacted]  
[Redacted]

Hello Beverley

I am just following up on correspondence from you dating back to 3 August 2020 [20EW0009746] re progress towards State Heritage Listing of the Adelaide Park Lands

You advised at the time that the listing would require preparation of a Conservation Management Plan.

Can you please advise what, if any, progress towards this goal has been achieved in the past seven months?

Kind regards

Shane Sody  
**President**  
Adelaide Park Lands Preservation Association.  
[www.adelaide-parklands.asn.au](http://www.adelaide-parklands.asn.au)



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Shane Sody &lt;shane.sody@gmail.com&gt;

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**RE: Progress on State Heritage Listing of the Adelaide Park Lands? [DLM=For-Official-Use-Only]**

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Voigt, Beverley (DEW) &lt;Beverley.Voigt@sa.gov.au&gt;

2 March 2021 at 10:23

To: Shane Sody &lt;shane.sody@gmail.com&gt;

Cc: [REDACTED],  
[REDACTED],  
[REDACTED]**For Official Use Only**

Dear Shane

Appreciate your follow-up and interest in the Adelaide Park Lands being made a SHA. It is also important outcome that we at Heritage SA and the SA Heritage Council wish to realise.

With stretched resources the progression of the Adelaide Park Lands CMP hasn't happened as quickly as originally anticipated with the priority for my team to develop and release (soon) the Heritage Standard for Colonel Light Gardens.

This work has been pioneering around how a State Heritage Area (SHA) will be managed under the Code and the work will also be foundational in how we now proceed with the Adelaide Park Lands. So while much hasn't progressed specifically, a lot of work has happened that I anticipate will stream line things moving forward.

The issue as I understand (but mostly my opinion) is that the management tool / policy of the Adelaide Park Lands if it becomes a SHA needs to be established to support the listing by the Planning Minister. Without it the consideration for it as a SHA won't be progressed.

Originally the instrument to support its management was understood to be the CMP however the Heritage Standard will now become the authorising tool under the Code. Hamish has met with City of Adelaide recently to determine what policies exist already that can be used as a starting point.

We expect that the development of what hopefully will be endorsed as the Heritage Standard for the Adelaide Park Lands will be delivered under a similar framework as what has occurred for Colonel Light Gardens. We are currently seeking the necessary approvals to proceed along these lines.

Kind regards

Bev



Shane Sody &lt;shane.sody@gmail.com&gt;

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**RE: Progress on State Heritage Listing of the Adelaide Park Lands? [DLM=For-Official-Use-Only]**

---

**Shane Sody** <shane.sody@gmail.com>

8 July 2021 at 10:04

To: "Voigt, Beverley (DEW)" &lt;Beverley.Voigt@sa.gov.au&gt;

Cc: [REDACTED],  
[REDACTED],  
[REDACTED]

Hello Beverley

I am just following up from this advice of yours from 2 March.

Is there any progress to report on the likelihood of State Heritage listing? Or the preparation of a "Heritage Standard" rather than a "Conservation Management Plan"?

It is more than two and a half years since the State Heritage Council recommended this listing.

The apparent lack of progress might be perceived, by some, as a lack of commitment by the State Government to heritage protection of the Adelaide Park Lands.

Kind regards

Shane Sody

**President**

Adelaide Park Lands Association.

[www.adelaide-parklands.asn.au](http://www.adelaide-parklands.asn.au)**Adelaide  
Park Lands  
Association**

[Quoted text hidden]



Shane Sody <shane.sody@gmail.com>

**RE: Progress on State Heritage Listing of the Adelaide Park Lands? [DLM=For-Official-Use-Only]**

Voigt, Beverley (DEW) <Beverley.Voigt@sa.gov.au>  
To: "shane.sody@gmail.com" <shane.sody@gmail.com>  
Cc: [REDACTED]

15 July 2021 at 18:50

[REDACTED]

**For Official Use Only**

Dear Shane, Iris, Michelle, Martin, Stephanie

After launching the Heritage Standards for Colonel Light Gardens State Heritage Area (SHA) in mid-March 2021, Heritage South Australia, DEW, in partnership with the City of Adelaide, has recently commissioned DASH Architects, to do some early policy work in relation the on-going management of the State heritage values of the Park Lands. It is proposed this work would then be incorporated into a Heritage Standards document for the proposed Adelaide Park Lands + City Layout SHA. You will be aware that DASH Architects undertook the heritage assessment for the Adelaide Park Lands + City Layout.

For your information I have attached the Heritage Standards for Colonel Light Gardens SHA, which will give you an indication of the scope/ content of a Heritage Standards document, bearing in mind the Adelaide Park Lands + City Layout is a very different SHA to the Colonel Light Gardens SHA.

We are currently seeking support from the Minister that once we have a draft Heritage Standards document Heritage South Australia, DEW will release it to a list of key stakeholders (including APPA) for initial comment/input, prior to broader public consultation, probably via the State Government's YourSAy website.

I appreciate that it has been a period of time, since the SA Heritage Council determined that the Adelaide Park Lands + City Layout should be recognised at a State level, however it is difficult to give you a timeline for completing this work. I would like to reassure APPA that Heritage South Australia, DEW and the Minister for Environment and Water regards the creation of a State Heritage Area for the Adelaide Park Lands + City Layout as an State Government important initiative to protect its heritage values.

Kind Regards

Bev