



Adelaide Park Lands Association

c/o BK Partners Pty Ltd
P.O. Box 4056
Norwood South
SA 5067
secretary@adelaide-parklands.asn.au

ABN 19 706 384 386

Susan Close MP
Minister for Climate, Environment and Water
GPO Box 11071
Adelaide SA 5001

OfficeOfTheDeputyPremier@sa.gov.au

Dear Minister Close

Adelaide Park Lands: Heritage listing; and construction sites

I note recent media comments attributed to you on Monday 28 November. (*'Under-threat' park lands need world heritage protection: Libs*)¹

In that article you are quoted as saying that the Government did not support the *Heritage Places (Adelaide Park Lands) Amendment Bill 2022* because "it circumvents normal heritage listing process by not recognising the role of the South Australian Heritage Council nor allowing for public consultation".

These comments suggest that you might have been poorly briefed on this subject.

The Adelaide Park Lands were nominated for State Heritage listing back in 2009. Belated public consultation on that nomination was carried out by Heritage South Australia in 2017. There were 1,747 public respondents to the Heritage South Australia survey. Of those respondents, 88% thought that the Adelaide Park Lands should be State heritage-listed.

In the same year (2017) Heritage SA engaged a consultant, Dash Architects, to consider whether the Adelaide Park Lands met the statutory criteria for State Heritage listing. The consultant's report, dated May 2018, was not released publicly until after it had been considered by the State Heritage Council.

The assessment is a comprehensive 91-page document² that examines the history, features, and values of the Park Lands. Not surprisingly, the assessment found that the Park Lands do meet most of the legal criteria for State Heritage recognition.

After considering the assessment, the State Heritage Council reported to the then-Minister for Environment and Water (David Speirs, MP) on 6 December 2018 "recommending the Adelaide Park Lands, Squares and City Layout be recommended to the Minister for Planning, for State Heritage Area consideration."

It is now four years since the State Heritage Council recommended to the previous Government that the Adelaide Park Lands should be declared a State Heritage Area. In four years there appears to have been no progress towards achievement of State Heritage listing. The private members Bill moved by Robert Simms MLC was effectively an effort to get belated action on this recommendation.

If the Government is not inclined to support the *Heritage Places (Adelaide Park Lands) Amendment Bill 2022* then I would appreciate your advice about if and when the Government might act upon the State Heritage Council's 2018 recommendation.

1 <https://indaily.com.au/news/2022/11/28/under-threat-park-lands-need-world-heritage-protection-libs/>

2 <https://cdn.environment.sa.gov.au/environment/docs/her-gen-adelaide-park-lands-heritage-assessment-report.pdf>

Adelaide Park Lands: "Protect and Restore"

I also note your comments, reported in the same InDaily article, that "the Malinauskas government is committed to protecting and restoring the Adelaide Park Lands."

The Adelaide Park Lands Association shares this goal of protecting and restoring. I am finding it difficult to reconcile your statement with the State Government's actions in 2022 to choose Park Lands sites (and reject brownfield sites) for:

- an extension of Botanic High School on Park 11;
- a new Aquatic Centre in Park 2;
- an eight-storey car park and new hospital in Park 27; and
- legislation allowing new police facilities on Park Lands.

If the Government was committed to "protecting and restoring the Adelaide Park Lands" then the Government would be pursuing brownfield sites for these new proposed developments. That course of action is still open to you. I urge the Government to put words into action, and protect and restore the Adelaide Park Lands by switching attention to one or more brownfield sites.

In the case of the proposed Aquatic Centre, 682 survey respondents voted overwhelmingly (more than 85%) to endorse a brownfield site, rather than the Government's proposed Park Lands site.³ These survey respondents have had their views ignored. A petition seeking that outcome has attracted almost 1,000 signatures.⁴

One appropriate near-city brownfield site is the old West End brewery site on Port Road, currently for sale.⁵ This site - more than 8.4 hectares - is in easy reach of the City on the tram line, and is large enough to accommodate at least a new Aquatic Centre, a new High School building, and new Police barracks, if not a new hospital as well.

I look forward to hearing from you on both:

- State heritage listing of the Adelaide Park Lands, and
- selection of one or more brownfield sites rather than Park Lands for each of the proposed new Government-funded buildings.

Yours sincerely

Shane Sody, President



29 November 2022

3 <https://www.adelaide-parklands.asn.au/new-aquatic>

4 <https://www.change.org/p/save-these-trees-choose-a-brownfield-site-for-new-aquatic-centre>

5 <https://www.realcommercial.com.au/for-sale/property-the-old-west-end-brewery-site-107-port-road-thebarton-sa-5031-504167591>

OFFICIAL



Government
of South Australia

Reference: CEW22/02238

The Hon Susan Close MP
Deputy Premier
Minister for Climate, Environment and Water
Minister for Industry, Innovation and Science
Minister for Defence and Space Industries
Level 13, State Administration Centre
200 Victoria Square, Adelaide SA 5000
Tel (08) 8226 8520
Email: OfficeoftheDeputyPremier@sa.gov.au

Mr Shane Sody
President
Adelaide Park Lands Association
Email: secretary@adelaide-parklands.asn.au

Dear Mr Sody

Thank you for your letter, 29 November 2022, regarding the heritage listing of the Adelaide Park Lands and the use of sites in the Park Lands for various State government sponsored development projects. I have forwarded your correspondence to the office of the Hon Chris Picton MP, relating to the matter of the selection of more brownfield sites.

As you note in your letter, the State government did not support the *Heritage Places (Adelaide Park Lands) Amendment Bill 2022* when it was recently debated in Parliament. This decision was based on the view that including the Adelaide Park Lands in the South Australian Heritage Register through an amendment to the *Heritage Places Act 1993* inappropriately circumvented the involvement of the South Australian Heritage Council and any necessary public consultation.

I want to reassure you that despite that decision the State government recognises that the Adelaide Park Lands are an important asset for the people of South Australia and therefore we included a commitment, prior to the 2022 State Election, to 'Protect Adelaide's unique Park Lands' by:

- Restoring full protection to Helen Mayo Park;
- Investigating creating an uninterrupted walk, run and cycle circuit around the Park Lands; and
- Ensuring membership of the Kadaltilla/ Park Lands Authority reflects the skills and experience required by the *Adelaide Park Lands Act 2005*, including knowledge of biodiversity and cultural heritage.

As you are aware the Adelaide Park Lands are a complex mix of tenures, buildings, infrastructure and landuses. Following the recommendation of the South Australian Heritage Council, work is being undertaken on developing a draft Heritage Standard to guide development and activities in the Adelaide Park Lands into the future. Public consultation will occur on the draft Heritage Standard in due course.

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

Yours sincerely



Hon Susan Close MP
Deputy Premier
Minister for Climate, Environment and Water

10/1/2023





Adelaide Park Lands Association

c/o BK Partners Pty Ltd
P.O. Box 4056
Norwood South
SA 5067
secretary@adelaide-parklands.asn.au

ABN 19 706 384 386

Susan Close MP
Minister for Climate, Environment and Water
GPO Box 11071
Adelaide SA 5001

OfficeOfTheDeputyPremier@sa.gov.au

Your reference: **CEW22/02238**

Dear Minister Close

Adelaide Park Lands: State Heritage listing

Thank you for your letter of 10 January 2023, responding to my letter of 29 November 2022. On the matter of brownfield sites for proposed new developments, you have indicated that the Health Minister, Chris Picton, will respond. I look forward to receiving Mr Picton's reply.

On the matter of State Heritage listing of the Adelaide Park Lands, I am afraid that your letter of 10 January 2023 merely repeats, without any explanation, the misunderstandings that I identified in my letter of 29 November 2022.

Your letter of 10 January posits that the *Heritage Places (Adelaide Park Lands) Amendment Bill 2022* would have "inappropriately circumvented the involvement of the South Australian Heritage Council and any necessary public consultation."

Your letter fails to acknowledge that the South Australian Heritage Council undertook its assessment of the Adelaide Park Lands (including wide public consultation) more than four years ago and made its recommendation to the (former) State Government on 6 December 2018. Your letter does not respond to my request for advice about "if and when the Government might act upon the State Heritage Council's 2018 recommendation."

You have referred to development of a "draft Heritage standard". The lack of such a standard has been used for more than four years as an excuse to delay State Heritage listing, despite the fact that such a standard is not a pre-requisite for interim heritage listing. Nor does your letter indicate what progress, if any, has been made on development of this standard over the past four years, nor offer any proposed time-line for completion of this task.

Your letter of 10 January also mentions SA Labor's pre-election commit to "full protection" for Helen Mayo Park. I note that the re-zoning of Helen Mayo Park announced in November 2022 does not achieve "full protection" for this part of the Adelaide Park Lands. An arbitrary zoning line has been maintained across Helen Mayo Park, so that the eastern portion of the Park, closest to Montefiore Road, is still liable to future Park Lands loss, as an "Entertainment sub-zone." This is not consistent with SA Labor's commitment to "full protection" for Helen Mayo Park.

Yours sincerely

Shane Sody, President

11 January 2023

www.adelaide-parklands.asn.au