



Adelaide Park Lands Association

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Susan Close MP
Minister for Climate, Environment and Water
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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>