



Adelaide Park Lands and City Layout

Issues and Opportunity Analysis for the
National Heritage Listing

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1.0 Introduction

DASH Architects and Stephanie Johnston were engaged by Heritage South Australia, Department of Environment and Water (DEW) to prepare a high-level Issues and Opportunities Analysis for the National Heritage listing of the 'Adelaide Park Lands and City Layout'. Reference to the 'Park Lands' throughout this report refers to the area encompassed by the National Heritage listing.

The aim of the project is to:

- improve City of Adelaide (COA) understanding of the National Heritage values of the place;
- improve COAs understanding of what affects the National Heritage values of the place and where they may be vulnerable;
- provide guidance for safeguarding the National Heritage values of the place; and
- develop a precursor to a comprehensive Heritage Management Plan (HMP) for the place's National Heritage listing.

1.1 The Brief

The brief for the project is as follows:

- understand the National Heritage values of the place;
- document uses in the Park Lands, and review the extent to which use is intrinsic to the National Heritage listing;
- identify actions or uses that may have an adverse effect on the National Heritage values of the place;
- discuss potential risks to the National Heritage values of the place through cumulative or incremental impacts;
- identify key issues that may require policy development to manage potential impacts to the place's National Heritage values;
- identify opportunities to enhance or conserve the National Heritage values of the place;
- identify obligations of land managers under the *Environment Protection Biodiversity and Conservation Act 1999* (Com) (EPBC Act) in relation to the National Heritage listing;
- identify when referrals to the Commonwealth Department of Environment and Energy (DEE) are required;
- document past referrals to DEE and their outcomes; and
- discuss what an indicative HMP may look like in terms of structure and content.

1.2 Methodology and Limitations

Due to the limited timeframe, budget and brief, this is a high-level report that has undertaken a preliminary review of key documents and targeted consultation.

Further to the National Heritage listing, the Adelaide Park Lands have other identified values and importance (i.e. biodiversity, Aboriginal cultural heritage), which is identified in various management plans, and managed under different legislation or other sections of the EPBC Act.

The following material was reviewed for this report:

- key COA management plans including:
 - Adelaide Park Lands Management Strategy 2015-2025;
 - The Park Lands Community Land Management Plan 2013;
 - Adelaide Park Lands Sports Infrastructure Master Plan 2014;
 - Adelaide Park Lands Master Landscape Plan 2011;
 - Adelaide Park Lands and Squares Cultural Assessment Study 2007;
 - Adelaide Park Lands Events Management Plan 2016-2020;
- Adelaide (City) Development Plan;
- *Adelaide Park Lands Act 2005* (SA);
- Gazettal of inclusion of place in NHL; and
- past referrals to the Commonwealth Government under the EPBC Act.

Targeted consultation was undertaken with the following individuals:

- Beverly Voigt, Hamish Angas and Michael Queale, Heritage South Australia, DEW;
- Martin Cook, City of Adelaide; and
- Adelaide Park Lands Authority (APLA).

The following key questions were asked as part of the targeted consultation, and responses were incorporated into Section 4:

- What potential issues do the Adelaide Park Lands face in terms of their use and management?
- Are there any cumulative or incremental impacts that could have an adverse impact on the National Heritage values of the Adelaide Park Lands?
- What is your understanding/opinion on the extent of 'views and vistas', as noted under Criterion (f) in the National Heritage listing for the Adelaide Park Lands?

Several brief Case Studies were undertaken to highlight specific matters throughout the report, such as:

- **Case Study 1:** Adelaide Botanic Garden and Botanic Park – brief review of management plans and strategies in relation to the National Heritage listing (Section 3.2);
- **Case Study 2:** City of Newcastle (NSW) – reference to their Heritage Impact Statement guidelines (Section 5.1); and
- **Case Study 3:** Bondi Beach (NSW) – how the National Heritage listing of Bondi Beach is integrated into their planning system (Section 5.1).

The report is structured as follows:

Section 1 – Introduction

Section 2 – National Heritage Listing

Section 3 – Management Obligations and Referrals

Section 4 – Analysis of Use and Potential Impacts

Section 5 – Recommendations and Policy Development

Section 6 – Heritage Management Plan Structure

Section 7 – Bibliography and References

Section 8 – Abbreviations and Definitions

Appendix A – Location and Boundary of National Heritage Listing

Appendix B – Summary of National Heritage Listing

Appendix C – Background Information to National Heritage Listing

Appendix D – Landscape Character Category Breakdown.

The report was reviewed by the steering group, consisting of Martin Cook, COA, and Hamish Angas and Beverly Voigt, Heritage South Australia, DEW.

A presentation on the purpose of the report and to seek input from APLA members in relation to key questions (above) was undertaken on 18 October 2018 and findings in the final report are to be presented to APLA at their January 2019 meeting.

1.3 Authorship and Acknowledgement

This report has been prepared by Deborah Lindsay, Senior Heritage Consultant and Jason Schulz, Director of DASH Architects, in conjunction with consultant Stephanie Johnston.

The authors wish to thank the following for their assistance in the preparation of this report:

- Lucas Trevisan, Planning Student Placement, Heritage South Australia, DEW;
- Beverly Voigt, Michael Queale and Hamish Angas, Heritage South Australia, DEW;
- Martin Cook, City of Adelaide; and
- Members of the Adelaide Park Lands Authority.

2.0 National Heritage Listing

This Section details the heritage values for the National Heritage listing of the Adelaide Park Lands and provides a discussion to understand each of the gazetted heritage values.

2.1 National Heritage Listing Gazettal

‘The Adelaide Park Lands and City Layout’ was inscribed on the National Heritage List by the Commonwealth of Australia in a special gazettal on 7 November 2008. This included a description of the location and boundary, and an assessment against significance criteria under Division 2 Section 10.01A (2) of the *EPBC Regulations 2000* (Com). The place was found to meet six of the eight significance criteria. The location and boundary description are provided in **Appendix A** for reference.¹

A summary of the National Heritage listing for the place is available on the Department of Environment and Energy’s website, which included various photographs and the location and boundary map (Figure 1). The summary information to the National Heritage listing is provided in **Appendix B**.²

The Australian Heritage Database record includes further background information to the National Heritage listing for the place, including photographs, a Summary Statement of Significance, its official values under the significance criteria, a description, history, condition and integrity, location and bibliography. This background information is provided under **Appendix C**.³

¹ Commonwealth of Australia 2008a

² Department of Environment and Energy 2018a; No photographs have been included in this report

³ Department of Environment and Energy 2018b

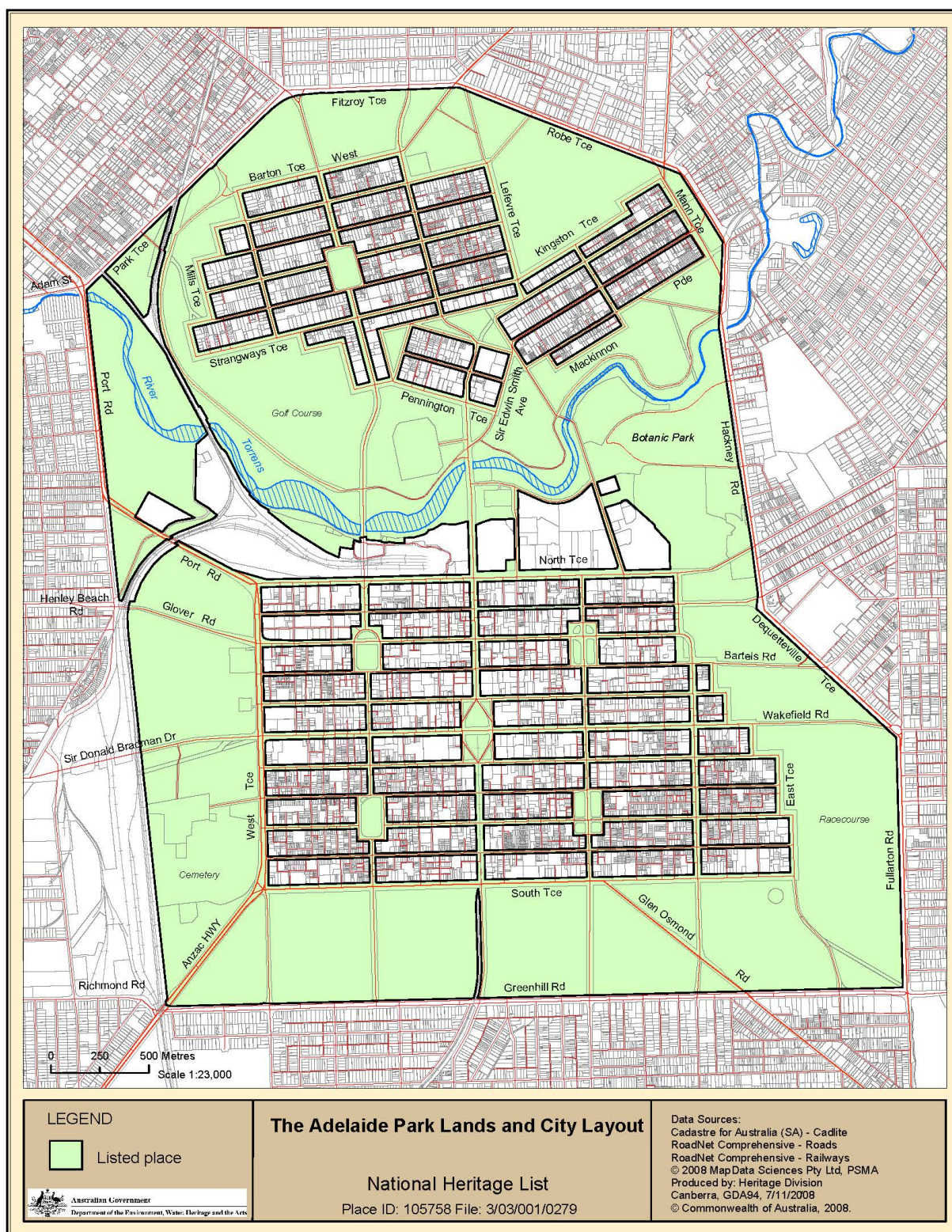


Figure 1 – National Heritage listing boundary (Source: Department of Environment and Energy 2018a)

2.2 Significance Assessment and Discussion

The significance criterion and assessment as gazetted for 'The Adelaide Park Lands and City Layout' National heritage listing is provided below, followed by a discussion and clarification of the meaning of these heritage values. The discussion is broken-down to further understand each of the factors mentioned in the 'gazetted significance assessment' for each criterion.

This report does not reassess the place against the National Heritage criteria, which is sometimes undertaken as part of a HMP if there is new research that reveals potential new heritage values for the place.⁴ It also does not attempt to define certain elements, which may be implied, such as views and vistas. It provides a discussion of intent of certain statements in the significance assessment, and where necessary, recommendations to further define and manage these values.

Criterion (a) the place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.

Gazetted Significance Assessment

The Adelaide Park Lands and City Layout is the physical expression of the 1837 Adelaide Plan designed and laid out by Colonel William Light. It has endured as a recognisable historical layout for over 170 years retaining the key elements of the plan; encompassing the layout of the two major city areas separated by the Torrens River, the encircling Park Lands, the six town squares, and the grid pattern of major and minor roads. It is substantially intact and reflects Light's design intentions with high integrity.

The Adelaide Park Lands and City Layout is of outstanding importance because it signifies a turning point in the settlement of Australia. It was the first place in Australia to be planned and developed by free settlers, not as a penal settlement or military outpost.⁵ The colony of South Australia was established by incorporation as a commercial venture supported by the British Government, based on Edward Wakefield's theory of systematic colonisation. To be commercially successful, there needed to be contained settlement to avoid speculative land sales and this settlement needed to be designed and planned to attract free settlers and to provide them with security of land tenure. The city layout with its grid plan expedited the process of land survey enabling both rapid settlement of land and certainty of title. The wide streets, public squares and generous open spaces provided amenity and the surrounding park lands ensured a defined town boundary while still allowing for public institutional domains. These elements are discernable [sic] today.

⁴ Department of the Environment, Water, Heritage and the Arts 2008:4, *Developing Management Plans* (part)

⁵ This statement in the listing is incorrect. Adelaide was the first place to be planned and settled by free settlers in Australia without the use of convict labour. The first free settlement was Fremantle, or Swan River as it was originally known, where in 1829 it was developed by free settlers until after 1842 when 234 juvenile offenders were transported to WA to assist with the labour shortage. (Fremantle 2018) Free settlement also occurred early in the Hunter Valley with convict labour. (Stephanie Johnston pers. comm.)

The Adelaide Park Lands is also significant for the longevity of its protection and conservation. The Adelaide Municipal Corporation Act (1840) established the city council as the 'conservators' of the city and park lands. The establishment of the Park Lands Preservation Society in 1903, along with successive community organisations marks a continuing pattern in community support for safeguarding the significance of the Park Lands for the Adelaide community. The Adelaide Plan was highly influential as a model for planning other towns in Australia and overseas. It is acknowledged by town planners and historians as a major influence on the Garden City Planning movement, one of the most important urban planning initiatives.

Discussion of Criterion (a)

The Adelaide Park Lands and City Layout is recognised for being of *historical importance to Australia's cultural history*. The key factors mentioned include:

1. it is a recognisable historical layout that has endured for over 170 years;
2. the legibility of the 1837 Adelaide plan is recognisable;
3. it was a turning point in Australian settlement, a planned colony for free settlers;
4. it was based on Edward Wakefield's theory of systematic colonisation;
5. it was established as a commercial venture and supported by the British Government;
6. its key elements of the plan (principal characteristics) and historical layout;
7. its longevity of its protection and conservation by the city council and successive community organisations;
8. it was highly influential as a model for planning other towns in Australia and overseas; and
9. it was a major influence on the Garden City Planning movement.

The first and second points refer to the recognisable historical layout of the 1837 Adelaide plan. Figure 4 illustrates the city layout in 1839 when the outer perimeter of the Park Lands was defined following the completion of the suburban land surveys. Reference to its legibility and the endurance of the layout is the overall integrity of this design. The integrity refers to many elements in the plan which are still discernible today, such as the six squares, encircling park lands, grid pattern of streets, wide streets, rectangular land parcels and the defined boundary. Of course today the 'recognisable historical layout' has endured for over 180 years, which any amendment to the listing could update.

The third, fourth and fifth points refer to the key idea for the settlement. Adelaide was a turning point in Australian settlement being a planned colony for free settlers. However, the listing is slightly incorrect in that it was the first place to be planned and settled by free settlers in Australia without the use of convict labour. The underlined words are recommended to be added to the listing. The first free settlement in Australia was Fremantle, or Swan River as it was originally known, where in 1829 it was developed by free settlers until after 1842 when 234 juvenile offenders were transported to Western Australia to assist with the labour shortage. Free settlement also occurred earlier than 1837 in the Hunter Valley with the help of convict labour.⁶

⁶ Fremantle 2018; Stephanie Johnston pers. comm.

The thinking behind the new settlement was a balance of capitalistic ideals and social responsibility, based on Wakefield's theory of systematic colonisation. These factors influenced the 1837 Adelaide plan in terms of the number and size of land parcels in the city centre and surrounding suburbs, to ensure a centralised and regulated control of the sale of surveyed land. They also influenced social and cultural life, such as social inclusion, religious tolerance and self-sustainability. Whilst there has been subdivision of the original town acres, and additional laneways and streets through these land parcels, the overall rectangular form and the road hierarchy and width of these original roads in Light's plan is still discernible today.

The design of the Park Lands 'contained' the specific number of regular sized allotments for sale. The South Australian Colonization Commissioners in the United Kingdom offered potential purchasers one acre in the future capital plus 80 country acres. It was designed to attract free settlers and provide them with security of land tenure, and it was intended that the sale of Crown land would make a profit to be commercially successful and proceeds would be used to fund the immigration of free settlers to the colony, rather than granting free land to settlers.⁷

The sixth point is the key elements of the 1837 Adelaide plan or the principal characteristics. These characteristics are mentioned in several criteria with respect to different heritage values (i.e. under **criterion d** they are linked to the "exemplar of a nineteenth century planned urban centre"). With respect to **criterion a**, these characteristics are linked to the ideals behind the planning of the history, the historical influences that are still discernible today.

The seventh point is the longevity of protection and conservation. This refers to the role of City of Adelaide and its "successive landscape designers/managers" (mentioned under **criterion f**) and other management, who has played a role in designing, maintaining and protecting the Park Lands since the establishment of the city council in 1840. It also refers to the role of the Park Lands Preservation Society and other successive community organisations who have played a role is safeguarding the Park Lands, which is also acknowledged under **criterion g** for their social significance.

Reference to the Society under this criterion is to the 'Park Lands Preservation Society', while under **criterion g** it is to the 'Adelaide Parklands Preservation Society'. The correct name of the organisation is the 'Adelaide Park Lands Preservation Association', which was founded in 1987 (pre-National Heritage listing of the Park Lands). This is recommended to be amended in the listing.⁸

The eighth point is that the 1837 Adelaide plan was a 'model plan' for other towns. In 1864 Surveyor-General George Goyder drew up a standard plan for country towns throughout South Australia in a grid pattern with a parkland perimeter similar to Adelaide's (Figure 2). The town planning principles for the City of Adelaide went on to form the basis of Goyder's model layout for government-designed rural towns in South Australia from the 1860s to the 1910s. Adelaide as a model plan is also referred to under **criterion f**, where several examples are cited in New Zealand in the NHL assessment report.

⁷ Dutton 1960

⁸ Adelaide Parklands Preservation Association 2018

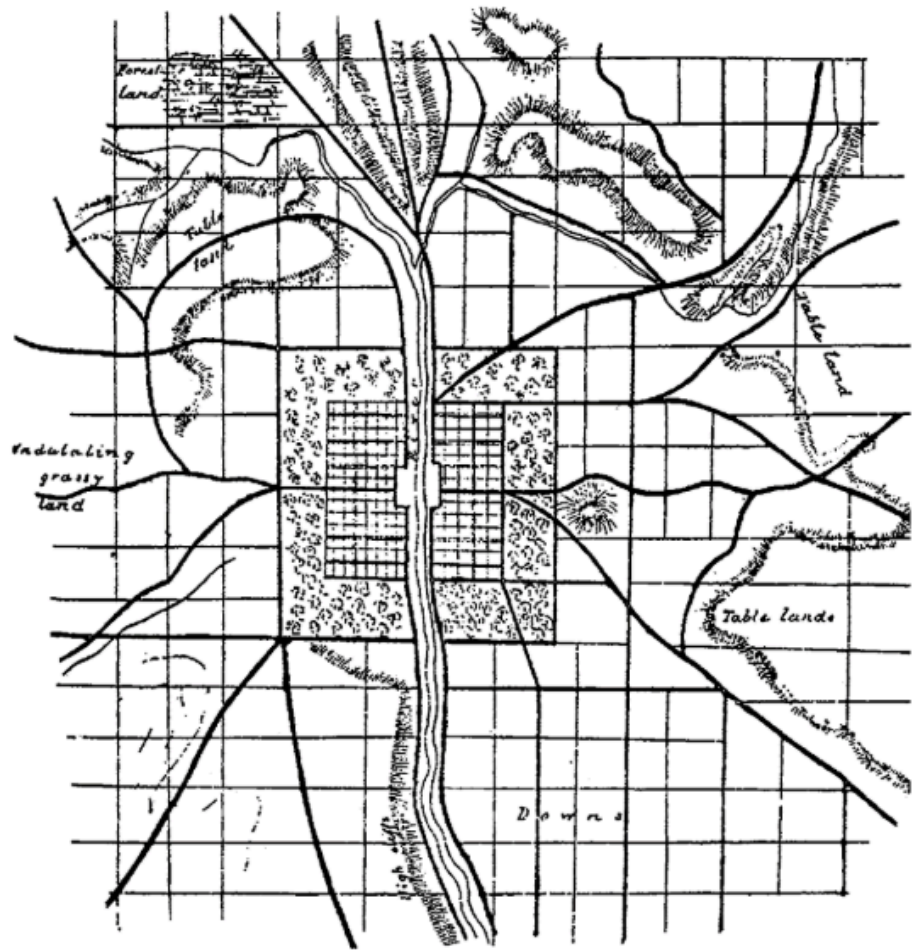


Figure 2 – Goyder's ideal town planning model, 1864 [Source: Amati 2008:112]

The last point noted that the 1837 Adelaide plan was a “major influence on the Garden City Planning movement”. Ebenezer Howard's Garden City movement was an early twentieth century town planning ideal. Howard's 1902 text ‘Garden Cities of To-morrow’ embodied the 1837 Adelaide plan as an ‘ideal’ town plan. However, there is debate as to whether the Movement was influenced by the ‘Adelaide plan’. This is recommended to be clarified in the listing. The Garden City movement had a profound effect on town planning with ideals of creating new parks, boulevards and street beautification by linking aesthetics with growth, and encouraging generous open spaces and other characteristics.⁹

Criterion (b) the place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.

Gazetted Significance Assessment

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth-century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837

⁹ Mumford 1961:586 and Sulman 1919 in Department of Environment and Energy 2018b

Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth-century park lands in Australia.

Discussion of Criterion (b)

The assessment acknowledges *rare and uncommon aspects of Australia's cultural history*, specifically as:

1. the most complete example of nineteenth-century colonial planning where planning and survey were undertaken prior to settlement;
2. the historical layout of the 1837 Adelaide Plan remains clearly legible today;
3. the only Australian capital city to be completely enclosed by park lands; and
4. the most extensive and substantially intact nineteenth-century park lands in Australia.

Summary information received in support of the NHL nomination provided comparative analysis, which was incorporated into the NHL assessment report. This report has not substantiated these facts with further research, which is recommended as part of a detailed comparative analysis as part of any HMP for the place.

Firstly, the comment that the 1837 Adelaide plan is the most complete example of colonial planning and survey that was undertaken prior to settlement refers to the ideals that were discussed under **criterion a** (above). This makes Adelaide different from the design and planning of other capital cities in Australia.

Other major Australian settlements, such as Sydney (1788), Hobart (1803), Brisbane (1824), Perth (1829) and Melbourne (1835), began with a small area of rectangular grid planned streets, which still exists today, but around that they developed in an 'untidy' manner. There was also no vision of how they would develop into larger settlements, and there was little provision for large areas of open space. This makes the planning and design of the 1837 Adelaide plan unique.

Secondly, the 'legibility' of the 1837 Adelaide plan is also recognised as part of its *rarity*. This refers to the key characteristics, outlined under **criterion d**, such as its defined boundary, grid pattern and width of streets, public squares, spacious rectangular blocks, and expansive public open space for commons and public domains. Although the city centre has developed and grown, these key characteristics are still definable elements when looking at the city's current form. Although the use, design and landscape character of the squares and surrounding park lands has changed over time, the overall form remains readily legible.

Thirdly, the planning for the city of Adelaide by Light included the surrounding (or encircling) park lands, which is a unique feature. No other Australian capital city has this design. The overall form and layout of the park lands is a clearly visible feature when viewing Adelaide from the air or from Mount Lofty, which is specifically mentioned under **criterion f**.

The last point notes that it is the most extensive and substantially intact nineteenth-century park lands in Australia. Again this criterion refers to 'park lands' as a space or the overall form as being important. Examples of

comparison in the NHL assessment report included Adelaide Park Lands (822 ha), Kings Park in Perth (400ha), Albert Park in Melbourne (225 ha), Centennial Park in Sydney (220 ha).¹⁰

Criterion (d) the place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of: (i) a class of Australia's natural or cultural places; or (ii) a class of Australia's natural or cultural environments.

Gazetted Significance Assessment

The Adelaide Park Lands and City Layout is an exemplar of a nineteenth-century planned urban centre. It demonstrates the principal characteristics of a nineteenth century city including a defined boundary, streets in a grid pattern, wide streets, public squares, spacious rectangular blocks and expansive public open space for commons and public domains. The expression of these features with their generous open space reflects the early theories and ideas of the Garden City movement of an urban area set in publicly accessible open space with plantings, gardens, designed areas and open bushland.

Discussion of Criterion (d)

The Adelaide Park Lands and City Layout has been assessed as a *class of Australia's cultural places*, being an 'exemplar of a nineteenth-century planned urban centre'. Specific principal characteristics mentioned include:

1. defined boundary;
2. streets in a grid pattern;
3. wide streets;
4. public squares;
5. spacious rectangular blocks; and
6. expansive public open space for commons and public domains.

The first characteristic is the 'defined boundary'. There was no defined outer Park Lands boundary in Colonel William Light's 1837 Adelaide plan (Figure 3). The inner perimeter along the terraces was sharply defined, however the outer perimeter was drawn as a roughly dotted line. The outer boundary of the Park Lands was defined the following year as the as the surrounding interfacing areas were surveyed (Figure 4).

The second and third characteristics are the 'streets in a grid pattern' and 'wide streets' that formed part of the 1837 Adelaide plan. Light's plan had nine east-west streets between North and South terraces one and two chain widths, and four north-south streets in the much longer distance between West and East terraces. A similar pattern and hierarchy of streets was designed in North Adelaide, although the land parcels and streets were designed around the topography. The grid pattern had been used since classical times by the Ancient Greeks and Romans, however Light's response to the topography forms the

¹⁰ Department of Environment, Water, Heritage and the Arts 2004:17; The National Heritage Listing Gazettal on page 2 stipulates approx. 900ha. for the Adelaide Park Lands. The exact area should be confirmed and amended in the listing in appropriate places.

unusual grid pattern in North Adelaide, as discussed further under **criterion f** (below).



Figure 3 – William Light’s 1837 survey of Adelaide [Source: Second Report on Colonization of South Australia, House of Commons, 1837]

There was a logical hierarchy of major and minor streets, although Light did not prescribe the connectivity to the urban land parcels. Over time, various roads, lanes and public transport were added through the encircling park lands and squares, which had an impact on their form at the micro level (i.e. creating what we know today as 29 parks)¹¹ (Figure 6). However, at the macro level there are still six squares and encircling park lands.

¹¹ Pers Comm. Martin Cook

The fourth characteristic is the public squares. Six squares were part of Light's plan: Victoria, Light, Hindmarsh, Hurtle, Whitmore and Wellington. They were part of an underlying understanding and commitment to improving the well-being of new settlers. On Light's 1837 plan the squares were shown dotted with trees and meandering paths (Figure 3 above).



Figure 4 – Section of Districts of Adelaide plan by Arrowsmith, 1839 [Source: Adelaide City Archives]

Many of the characteristics that make Adelaide's planned city so important were part of a series of rules by the Spanish for designing colonial cities called the 'Law of the Indies'. This included a geometrical grid pattern with a main thoroughfare and centred around a main square. There are numerous historical precedents for five squares, including Philadelphia in America in 1682 by surveyor Thomas Holme. Philadelphia's rectangular plan also had five city squares and several wide streets, however its legibility has been affected by later development. Similarly, the 1788 plan of Toronto in Canada has a square plan with five squares, surrounded by a Government Park and beyond which were suburban subdivisions, however the plan was never implemented as designed due to costs.

The overall form of these six squares in Adelaide remains today with minor changes to their configuration to accommodate changing transportation and

connectivity requirements for a growing modern city. The internal spaces and uses of these squares have changed over time, some more than others, however these spaces and their intended uses were never clearly defined in Light's survey or writings.¹²

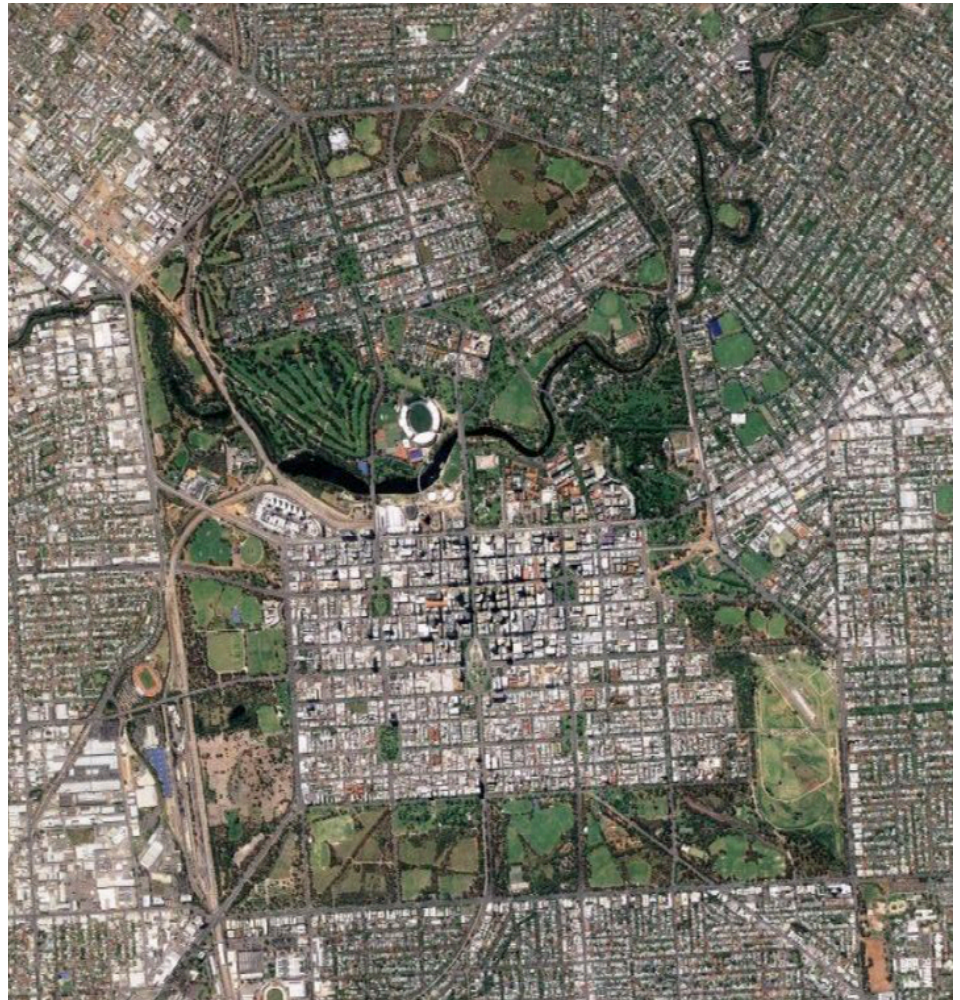


Figure 5 – Aerial view of Adelaide, 2018 [Source: Google Maps 2018]

The fifth characteristic is the 'spacious rectangular blocks'. The land was divided into 1042 town acres, straddling the River Torrens, with two distinct areas: 700 in South Adelaide; and 342 in North Adelaide. This specific number and size of allotments was chosen, being contained by the outer ring of park lands and the inner squares, to help ensure the commercial success of land sales and security of land tenure for new settlers. Where other colonial settlements were perceived as being unsuccessful, Adelaide's 'planned urban centre' was to be successful through its careful design and planning.

The last characteristic of the Adelaide Park Lands and City Layout is the 'expansive public open space for commons and public domains'. This refers to the outer ring of parklands and the land along the River Torrens. Light's 1837 plan shows trees and grassland and it allocates areas for a number of

¹² Hutchings 2006

government or community facilities, including Government House, barracks, hospital, school, cemetery and market.

January 2018



Figure 6 – Adelaide Park Lands, park names and numbers, 2018 [Source: City of Adelaide 2018a]

The assessment then examines how these identified characteristics are expressed in terms of nineteenth century theories and ideas of the Garden City movement, including:

- publicly accessible open space with plantings;
- gardens;
- designed areas; and
- open bushland.

The Garden City movement started in the 1890s by Ebenezer Howard, and the Adelaide City plan was embodied as an 'ideal' town plan. The Adelaide plan reflected early 19th century ideals about access to public open space.¹³

The above mentioned 'expressions' of town planning characteristics are evident throughout the park lands and squares today. There are multiple areas of 'publicly accessible open space with plantings'. Many of the parks are surrounded by tree lined streets and informal recreation areas. There are multiple 'gardens', such as Botanic Garden, Veale Gardens and Himeji Garden, and 'designed areas', such as Bonython Park, Rymill Park and Elder Park.

There are areas of informal landscape character within the Park Lands that could be considered as 'open bushland'. There was a move away from creating formal gardens and exotic plantings in the 1980s, with a focus on replanting parts of the Park Lands with native and indigenous grasses, shrubs and trees.

The listing appears to refer broadly to a diversity of landscapes, such as formal and informal gardens, structured and unstructured spaces, all of which sit in contrast to the built form of the city and surrounding suburbs.

Criterion (f)	the place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.
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Gazetted Significance Assessment

Adelaide Park Lands and City Layout is regarded throughout Australia and the world as a masterwork of urban design. Elements of the Adelaide Plan that contribute to the design excellence are the use of the encircling park lands to define the boundary of the development of the city and to provide for health, public access, sport, recreation and public institutional domains, thereby meeting both economic and social requirements. Designing the city layout to respond to the topography was highly innovative for its time with the northern sections of the city located and angled to take advantage of the rising ground while retaining the Torrens River as a feature within the Park Lands. The judicious siting and wide streets maximised views and vistas through the city and Park Lands and from some locations to the Adelaide Hills. The plan features a hierarchy of road widths with a wide dimension to principal routes and terraces and alternating narrow and wide streets in the east-west direction. Light's planning innovation is supported by substantial historical documentation.

The formal organisation, delineation and dedication of the Park Lands space was a pioneering technical achievement of William Light in the Adelaide Plan.

The overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas, formal avenues, plantations, gardens, use of specimen trees, botanically important living plant collections particularly at the Adelaide Botanic Garden and the strategic placement of buildings and statuary in their settings.

¹³ Howard 1902; Johnson 2013

The creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills. The civic design of Adelaide was used as a model for founding many other towns in Australia and New Zealand and it is cited in later seminal Garden City planning texts including 'Garden Cities of Tomorrow' by Ebenezer Howard.

Discussion of Criterion (f)

The key characteristics of the 1837 Adelaide plan are again referred to in relation to their combination in 'demonstrating a high degree of creative achievement at a particular period', the period being the new colony for South Australia in the mid-nineteenth century, including:

1. encircling park lands;
2. response to the topography;
3. siting and width of streets that maximised views and vistas;
4. formal organisation, delineation and dedication of the Park Lands space;
5. overall landscape planting design;
6. park land design that is viewed from the air or Adelaide Hills;
7. the 1837 Adelaide plan was used as a model for other towns in Australia and New Zealand; and
8. the 1837 Adelaide plan was cited as an ideal town plan by Ebenezer Howard in his seminal text as part of the Garden City movement.

The first characteristic is the encircling park lands. This attribute is well defined when looking at the Park Lands from the air, as referred to under point 6. However, when reviewing aspects of the encircling park lands, there are potential 'broken links', both in the landscape character and what is excluded from the National Heritage listing, being the land in the western Park Lands between Port Road and the River Torrens.

The second characteristic is Light's topographical response to the terrain being 'highly innovative', as it took these key characteristics and applied them in a specific location to achieve the proposed economic and social foundations for the new colony. These characteristics and the response to the topography, are clearly legible today. Whilst there have been changes over time to the micro landscape (individual spaces), at the macro level, being the overall layout of the primary streets, essentially encircling park lands and squares, it retains high legibility. At the micro level there have been new roads, uses and changes to the landscape.

The third characteristic is the siting and the width of streets and their formal hierarchy, which was discussed under **criterion d** (above). Reference under **criterion f** however is to how they "maximised views and vistas through the city and Park Lands and from some locations to the Adelaide Hills". Views and vistas are also mentioned as part of the sixth attribute, and both points are jointly discussed below.

The fourth and fifth characteristic is the 'formal organisation, delineation and dedication of the Park Lands space' and 'overall landscape planting design' that incorporates various mentioned features, which forms part of its aesthetics and overall design. This refers to both the original design by Light, which was essentially just a plan with little detail, and the planning and design by multiple landscape designers and managers through their employment under the Adelaide

City Council. Light's 1837 plan may have showed his vision for the Park Lands landscape with randomly speckled trees, or he may have been illustrating retained existing trees (Figure 3 above).

The landscape designers and managers, such as George Francis, William O'Brien, Richard Schomburgk, John Ednie Brown, William Pengilly and August Pelzer, and engineer William Veale, were responsible for shaping the character and aesthetic of the Park Lands as we know them today. Their influence over the past 180 years created the 'designed vistas, formal avenues, plantations, gardens, use of specimen trees, botanically important living plant collections particularly at the Adelaide Botanic Garden and the strategic placement of buildings and statuary in their settings'. Their designs established different spaces and places for the community to use for different purposes throughout the park lands and squares.

Views and vistas are mentioned in the assessment as follows:

- the judicious siting and wide streets maximised views and vistas through the City and Park Lands and from some locations to the Adelaide Hills;
- the overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas; and
- the creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills.

While the judicious siting and wide streets maximised views and vistas through the City and Park Lands, and in some instances, to the Adelaide Hills, it remains unclear whether such views were intentional or incidental. The fact that there are twice as many east-west streets than north-south streets and their width, do however, contribute to the character and amenity of the Park Lands and City Grid Layout, and the views, whether designed, incidental or unintentional, are part of this character and amenity. These views have, of course, evolved over time as the city and surrounding suburbs have grown and densified. Taller buildings within the city have strengthened view corridors, while development on the outer edge of the Park Lands has provided greater definition to external perimeter of Lights Plan.

Various landscape plantings within the Park Lands have created "designed vistas", such as along main roads and the Botanic Gardens. These views and vistas contribute to the landscape character within sections of the Park Lands, however are not considered to be specifically intrinsic the National Heritage values themselves. The landscape character of the Park Lands is highly dynamic and has changed considerably over time in response to differing City landscape designers, landscaping and cultural trends. This curation will continue to evolve through the use of space by subsequent generations.

Notwithstanding this, however, the National Heritage listing is somewhat vague with regards to the specific significance of views and vistas within the place. It is recommended that this attribute be further considered and clarified by any subsequent Heritage Management Plan.

The Park Lands design, especially the outer ring of park lands, is clearly defined with the urban built form, when viewed from the air or Mount Lofty (Figure 5, Figure 7 and Figure 8). The importance of this particular view is essentially as a greenbelt surrounding the city.

The last two characteristics refer to the 1837 Adelaide plan as being a ‘model’ town and an ‘ideal’ town. In terms of the 1837 Adelaide plan being a *model for other towns in Australia and New Zealand*, the NHL assessment report cites examples, such as Gawler, Mylor and Alawoona in South Australia, several places in Northern Territory and Christchurch in New Zealand.

Goyder’s established ‘model plan’ is discussed under **criterion a**. Noting that the 1837 Adelaide plan was cited in Howard’s seminal text as an ‘ideal town’, the fact that it was replicated elsewhere in Australia and New Zealand acknowledges its importance in planning and design.



Figure 7 – View of Adelaide CBD and Park Lands from Mount Lofty [Source: Department of Environment and Energy 2018b]



Figure 8 – Aerial view of Outer ring of Park Lands [Source: City of Adelaide 2018b]

Criterion (g) the place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

Gazetted Significance Assessment

The Adelaide Park Lands has outstanding social value to South Australians who see it as fundamental to the character and ambience of the city. The Park Lands with their recreation areas, sports grounds, gardens and public facilities provide venues for individual and group activities and events, meetings and passive and active recreation. The Park Lands also have significant social value due to the range of important civic, public, and cultural assets and institutions within it.

The present Adelaide Parklands Preservation Society is the latest in a long history of community groups dedicated to protecting the Adelaide Park Lands. These have included the Park Lands Defence Association (1869-87), the Park Lands Preservation League (1903, 1948) and the National Trust of Australia (SA). The longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands is exceptional.

Discussion of Criterion (g)

The significance assessment against **criterion g** can be broken-down under the following components of social or cultural values:

1. it is fundamental to the character and ambience of the city;
2. for its recreation areas, sports grounds, gardens and public facilities that provide venues for individual and group activities and events, meetings and passive and active recreation;
3. for its range of important civic, public, and cultural assets and institutions within it; and
4. the longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands.

Firstly, the Park Lands is acknowledged by many South Australians as having outstanding social value. The Park Lands are accessed by many on a regular basis for a variety of activities, sport, recreation, destinations or events. The social significance of the Park Lands has evolved over time with different uses.

Secondly, the various 'spaces' and 'places' within the Adelaide Park Lands are acknowledged for their importance in providing diverse areas for various uses and activities. The National Heritage listing does not directly specify what uses directly relate to the significance of the place, but it does mention:

- recreation areas, which could include playgrounds, walking and cycling tracks and dog parks;
- sports grounds, which could include Adelaide Oval, Adelaide Aquatic Centre and various sporting club facilities;
- gardens, which could include the historic 1850s Botanic Garden and more recent 1980s Himeji Garden; and
- public facilities, which could include playgrounds, toilets, dog parks, fitness equipment, model aircrafts and boating facilities.

Thirdly, various ‘places’ within the Park Lands are acknowledged for their important civic, public, and cultural uses. Again, while the National Heritage listing does not directly specify these places, it indicates ‘cultural assets and institutions’, which could include:

- West Terrace Cemetery (established in late 1830s);
- Adelaide Zoo (established in 1880s);
- Torrens Parade Ground (established in late 1890s); and
- Adelaide High School (established in early 1950s).

Many of the City other cultural assets and institutions, such as the South Australian Museum, Art Gallery of South Australia, University of Adelaide, University of South Australia and Adelaide Gaol, are located between the River Torrens and North Terrace, but they are located within the Riverbank and Institutional Zone under the Adelaide (City) Development Plan.

Lastly, the Adelaide Parklands Preservation Association, and its predecessors, is a community group that is acknowledged for its long history in advocating for the protection of the Park Lands. These preservation groups grew out of a concern for alienation of the Park Lands with the first society forming in 1903. Some land uses remain controversial and there is still community concern raised at various proposed intrusions into the Park Lands, in particular into publicly accessible open space.

Criterion (h)	the place has outstanding heritage value to the national because of the place’s special association with the life or works of a person, or group of persons, of importance in Australia’s natural or cultural history.
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Gazetted Significance Assessment

Colonel William Light is most famously associated with the plan of Adelaide. He bore the ultimate responsibility, as recorded in his surviving publications and letters.

Discussion of Criterion (h)

Colonel William Light is acknowledged as *a person of importance in Australia’s cultural history*. Light was ultimately responsible for the 1837 plan for the City of Adelaide, which laid out the streets, land parcels, squares and parklands for the city centre of the new colony. Whilst others had an influence in the design, such as Edward Gibbon Wakefield’s principles for establishing a colony for South Australia with solid economic and social foundations, and the Colonization Commission’s regulations (1835) and instructions (1836) that spelled out certain criteria, it was Light’s knowledge of city planning principles and historic precedents, and his combination of these other influences that produced the Adelaide city plan.

Whilst the influence of other persons is not specifically noted as having a special association under this criterion, such as Edward Gibbon Wakefield, the principles are acknowledged under **criterion (a)** of the National Heritage listing.

3.0 Management Obligations and Referrals

This Section briefly discusses the obligations of all land managers with regard to the management of the National Heritage values of the Park Lands under the EPBC Act, reviews past EPBC Act referrals to the Commonwealth Government, and it provides a step-by-step process for self-assessment referrals for any activity impacting on the National Heritage listed Park Lands.

3.1 Management of the Park Lands

The City of Adelaide (COA) and the South Australia Government and its agencies protect and manage the Park Lands for all South Australians.

Local Councils are required to prepare and adopt a Community Land Management Plan (CLMP) for all their community land under Division 4 of the *Local Government Act 1999* (SA). COA's current CLMP identifies a management framework for its planning and management of the Adelaide Park Lands.¹⁴

Various legislation is mentioned in the CLMP planning framework with further details under Appendices, including the EPBC Act, Adelaide Park Lands Act, Local Government Act and Development Act.¹⁵ Reference to the National Heritage listing of the Park Lands in the CLMP is minimal with a focus on its 'overall layout' as being significant and 'recognising the importance of views and vistas'. As discussed under Section 2.2 of this Report, the National Heritage listing have other aspects that are part of its identified National Heritage values, which are not covered under the Framework or Chapters of the CLMP.¹⁶

Each Chapter in the CLMP provides detailed plans for each Park and Square. Various areas defined as are 'State Managed' are excluded from the CLMP (Figure 9). Some State Managed Areas are located outside the boundary of the National Heritage listing boundary of the Park Lands, such as the New and Old Royal Adelaide Hospital (latter now known as Lot Fourteen) and the University of Adelaide, and some State Managed Areas, such as the Torrens Parade Ground and Botanic Park, are located within the National Heritage listing boundary.

Management Plans are required to be prepared by each State Government agency for the area of Park Lands they own or occupy or under their care, control or management, under s.20 of the *Adelaide Park Lands Act 2005* (SA).¹⁷

All Management Plans are required to be updated every five years under the Adelaide Park Lands Act, so there is an opportunity to improve the identification and connection between the National Heritage listing of the Park Lands and policy and procedures to conserve these values in updated documents. A review of CLMPs for each area and Management Plans by State Government agencies was outside the remit of this report.

¹⁴ City of Adelaide 2018c:4-5

¹⁵ The PDI Act superseded the Development Act in 2016

¹⁶ City of Adelaide 2018c:11

¹⁷ Pers. Comm. Martin Cook

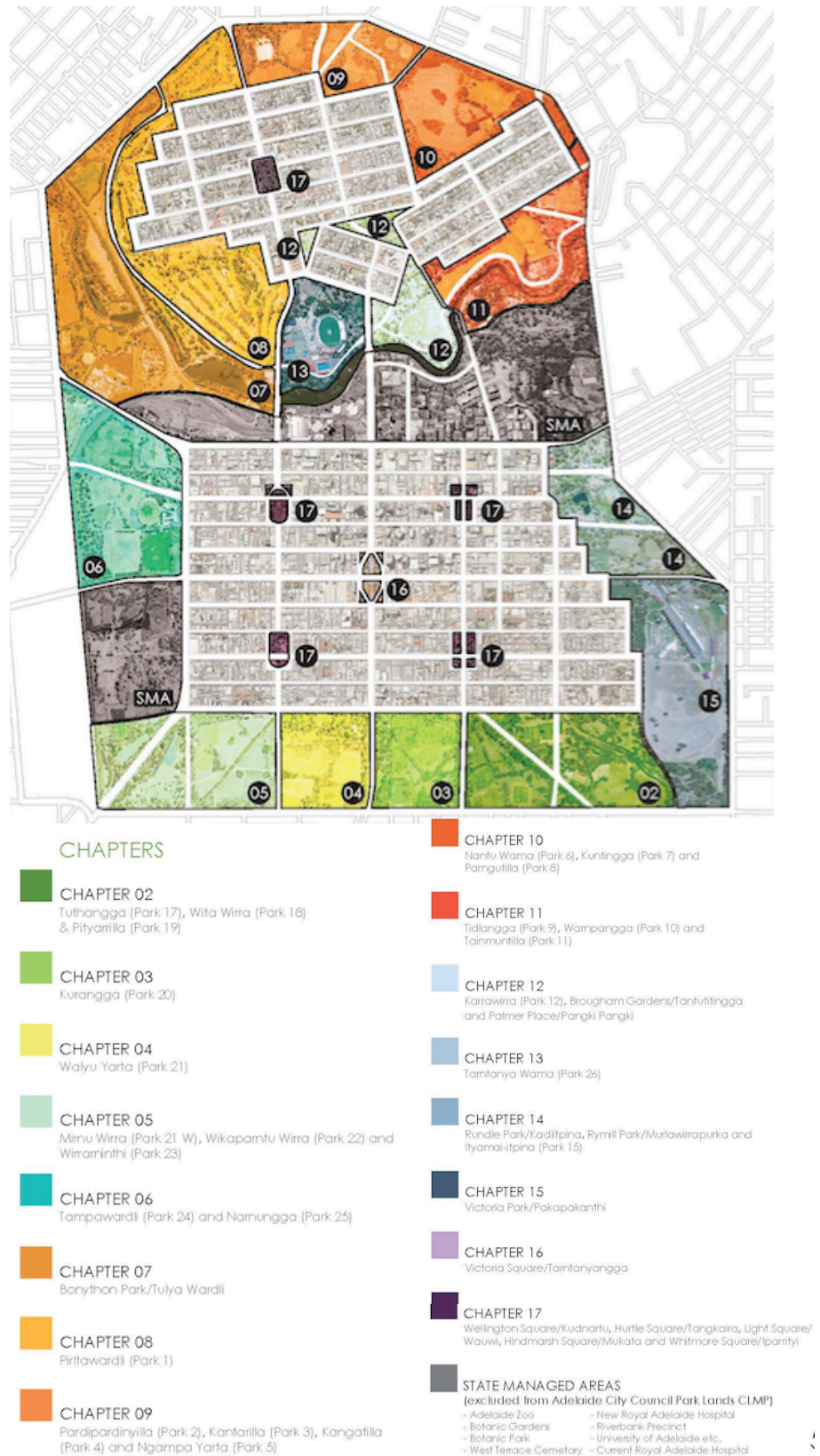


Figure 9 – Adelaide Park Lands CLMP Chapters [Source: City of Adelaide 2018c]

3.2 Role of Land Managers

There are various responsible parties for the management of the Park Lands within the National Heritage boundary, including: ¹⁸

- Corporation of the City of Adelaide (approximately 89%);¹⁹
- Minister for Environment and Water (portion of land in Park 27);
- Minister for Education (Adelaide High School);
- Minister for Transport, Infrastructure and Local Government (Torrens Parade Ground);
- Treasurer (National Wine Centre);
- Renewal SA and Riverbank Authority (Greater Riverbank Precinct);
- Board of the Botanic Gardens and State Herbarium (Botanic Park, Adelaide Botanic Garden);
- Adelaide Cemeteries Authority (West Terrace Cemetery); and
- Zoos SA (Adelaide Zoo).

Each of these Land Managers are likely to have their own management plans, strategies and policy to manage the areas that are part of the National Heritage listed Park Lands. It is outside the remit of this project to review any management plans/strategies of other land managers, however **Case Study 1** briefly reviews how the National Heritage values are managed by the Board of the Botanic Gardens and State Herbarium.

Case Study 1 – Botanic Garden and Botanic Park:

There are several management documents, including: ²⁰

- Board of the Botanic Gardens and State Herbarium: Strategic Plan 2017-2022;
- Master Plan Report: Adelaide Botanic Gardens and Botanic Park and Mount Lofty Botanic Garden (2006); and
- Adelaide Botanic Garden Conservation Study (2006).

Many of these documents predate the National Heritage listing of the Park Lands. Those developed post-listing generally do not refer to the National Heritage listing. The Master Plan mentions various State Heritage Places and features at a high-level. The Conservation Study provides details of State Heritage Places, significance, history, features and conservation policy. There may be an opportunity to update the Master Plan and the Conservation Study to incorporate the National Heritage listing, and amend strategy, policy and procedures in relation to development assessment for all levels of heritage places for the land holdings of the Board of the Botanic Gardens and State Herbarium. It is not known if a Management Plan for the Park Lands under the care, control and management of the Board of the Botanic Gardens and State Herbarium has been prepared, as required under s.20 of the Adelaide Park Lands Act. Reg. 7 in the *Adelaide Park Lands Regulations 2006* (SA) requires Management Plan's to be made available to the public on the internet within a reasonable period.

Further analysis of Management Strategies, Master Plans and other management documents for all Land Managers in the Park Lands should be

¹⁸ Source: Adelaide Park Lands Map, GRO 01 / 2014; The preparation of a HMP should cross check that these land owners and managers are correct for the NHL boundary of the Park Lands.

¹⁹ Pers. Comm. Martin Cook

²⁰ Taylor Cullity Lethlean 2011; Board of the Botanic Gardens and State Herbarium 2017:11

undertaken, to identify any gaps in recognising and protecting the National Heritage values of the Park Lands, and ensuring appropriate processes are undertaken for development assessment against the National Heritage values. These recommendations are incorporated under Section 5.1 below.

All land managers within the Park Lands' National Heritage boundary have obligations under the EPBC Act to protect and manage the National Heritage values of the place under their control. Section 5.1 of this Report provides recommendations for all land managers within the Park Lands' National Heritage boundary to:

- ensure they understand their obligations under the EPBC Act;
- improve their understanding of the Park Lands' National Heritage values;
- ensure they have appropriate policy and processes in place to protect and manage the National Heritage values;
- ensure they understand what potential actions may impact on the National Heritage values of the Park Lands;
- improve the rigour in the self-assessment process of actions that may affect the Park Lands' National Heritage values; and
- understand when an action may require referral to the Commonwealth Government and what steps are required.

3.3 Role of APLA and COA

The Adelaide Park Lands Authority (APLA) was established by the *Adelaide Park Lands Act 2005* as a subsidiary of the City of Adelaide (COA) under the *Local Government Act 1999*. APLA is the principal advisor to both COA and the State Government on the protection, management, enhancement and promotion of the Adelaide Park Lands. The Strategic context of APLA is established under s.9 of the Adelaide Park Lands Act.²¹

APLA's statutory functions include commenting on any proposals or management plans for any areas of the Park Lands managed by either COA or the State Government.

COA approve proposals for land under their management and control. Some minor proposals are dealt with administratively by COA regarding landlord consent. National Heritage impacts are considered as part of the COA's administrative reporting process to APLA.

Neither APLA nor COA comment on development applications, which are assessed either by the Council Assessment Panel or by the State Commission Assessment Panel (SCAP), nor referrals for proposals to the Commonwealth Department of Environment and Energy on possible NHL value impacts to the Park Lands.²²

3.4 Bilateral Agreement

In South Australia there are two Bilateral Agreements between the Commonwealth and South Australian Governments; 'Assessment' (in-force); and 'Approval' (in-draft).

²¹ Preamble to APLA Agendas, such as APLA 2018:a

²² City of Adelaide 2018d

The 'Assessment Bilateral Agreement' allows the Commonwealth Environment Minister to rely on specified environmental impact assessment processes in South Australia when assessing actions under the EPBC Act. The Department of Environment and Energy have a signed copy of the 'Assessment Bilateral Agreement' dated 2014 on their website.²³

The 'Approval Bilateral Agreement' provides for accreditation of South Australia's processes for approval of proposed actions that would otherwise be assessed by the Australian Government for approval under the EPBC Act. The 'Approval Bilateral Agreement' is still in draft on the Department's website.²⁴

The following statement is noted from DPTI's Major Development Assessment Guidelines:²⁵

A Bilateral Agreement was signed between the South Australian and Australian Governments in 2008 in relation to the assessment of proposals that trigger both the Commonwealth EPBC Act and the 'Major Developments' provisions of the Development Act 1993. The bilateral agreement allows for the State and the Commonwealth to agree to the assessment of a Major Development or Project under the Major Development provisions of the Development Act 1993.

The approval decision still falls with the relevant Minister for the respective legislation. The Bilateral Agreement means the proponent can prepare one set of documents and conduct one public consultation process to meet the requirements of both Acts. While the decisions are separate, consultation will occur between State and Commonwealth agencies seeking consistency. Further detailed information of this process is available from the DPTI or on the Australian Government's website.

3.5 Role of DEW in National Heritage Impact Assessment

As there is no 'Approval Bilateral Agreement' between the Commonwealth South Australian Governments, the current process involves the Commonwealth Government referring all EPBC Act referrals for South Australia to DEW to coordinate comments from various State Government agencies. Heritage South Australia generally input into the process by providing comment on EPBC Act referrals affecting National Heritage Places to DEW's Strategic Policy and Impact Assessment Branch, as part of a whole-of-government response.²⁶

Heritage South Australia, DEW also advise owners of State Heritage Places or Areas if there are also obligations under the EPBC Act in relation to a National Heritage Place (i.e. Burra and Moonta).²⁷

²³ Department of Environment and Energy 2018c

²⁴ Department of Environment and Energy 2018c

²⁵ Department of Planning, Transport and Infrastructure 2017:27

²⁶ Pers. Comm. Hamish Angas, 2018

²⁷ Pers. Comm. Michael Queale, 2018

The new Planning and Development Code under the PDI Act will include a Local and State heritage overlay. There is no intention to include a National heritage overlay.²⁸ It is recommended that the Code include an overlay for all levels of heritage listings for South Australia: World; Commonwealth; National; State; and Local Heritage places (refer to recommendations in Section 5.1 below), and that these heritage places are also identified in appropriate mapping. The Planning and Development Code will become fully operational by June 2020, and Development Plans will no longer be in effect.²⁹

It is also recommended that DEW liaise with the Commonwealth Government to determine the status of the 'Approval Bilateral Agreement' between State and Commonwealth authorities to ensure that an acceptable process is established under the South Australian planning system for the impact assessment of actions against the National Heritage values in relation to development applications affecting matters of national environmental significance (NES) under the EPBC Act (refer to recommendations in Section 5.1 below).

3.6 Legislative and Policy Framework

The assessment of development within the Park Lands is governed by multiple tiers of legislation and policy documents, with bilateral agreements between State and Commonwealth Governments, and specific exemptions and referrals under the *Development Regulations 2008* (SA). To add further complication, the legislation is in the process of transitioning from the current Development Act to the PDI Act by June 2020.

The *Adelaide Park Lands Act 2005* (SA) establishes a legislative framework that:

- promotes the special status, attributes & character of the Adelaide Park Lands;
- provides for the protection and management of the Adelaide Park Lands;
- establishes the Adelaide Park Lands Authority and its functions; and
- amends various other legislation.

In addition to State legislation, the EPBC Act provides a legislative framework for the National Heritage listing of the Park Lands. Various Commonwealth Government guidelines provide details and advice on the assessment and development process (refer Section 3.8 for further details).

A detailed analysis of this legislation and planning structure requires both legal and planning expertise that is beyond the scope of this report. It is recommended that a detailed analysis of the legislation and planning framework for works undertaken within the National Heritage listing of the Park Lands be prepared as part of any HMP for the place.

3.7 Past Referrals to Commonwealth

A summary of past referrals to the Commonwealth Government in relation to the National Heritage listing of the Park Lands is provided in Table 1.³⁰

²⁸ Pers. Comm. Michael Queale, 2018

²⁹ Department of Planning, Transport and Infrastructure 2018

³⁰ Two EPBC Act referrals were not included in this table; 2012/6580 for the Adelaide High School Redevelopment was withdrawn and a new application submitted; 2016/7787 for the 2016/7787 had the referral accepted but later deemed to be invalid and is therefore no longer active.

The following summary comments are made in relation to these referrals:

- there appears to be an overall lack of rigour in the self-assessment process in relation to consideration of potential impacts of actions to the Park Lands' National Heritage values;
- there appears to be a general lack of understanding of the Park Lands' National Heritage values;
- 2 out of 10 referrals stated incorrect facts (i.e. that roads did not form part of the listing or values);
- 4 out of 10 referrals provided mitigation measures for potential impacts, as required;
- 6 out of 10 referrals included input or detailed assessment by heritage professionals in relation to impacts to National Heritage values;
- 6 out of 10 referrals did not consider potential impacts to views and vistas;
- 8 out of 10 referrals had encroachments into the Park Lands National Heritage listing, with all being assessed as a minor impact, however collectively these works may have adverse cumulative impacts on the grid layout, and some works may have impacted on views and vistas; and
- although the self-assessment process is not required to be undertaken by heritage professionals, it is highly recommended that a suitably qualified heritage professional assist with the impact assessment to provide the necessary rigour and with a clear understanding of the Park Lands' National Heritage values.

Proposed works associated with the new Royal Adelaide Hospital on North Terrace or the Torrens Rail Junction projects were not referred to the Commonwealth Government under the EPBC Act, therefore it is unknown if a self-assessment of all actions against the National Heritage values of the Park Lands was undertaken. For example, even though works may have been outside the boundary of the National Heritage listing for the Park Lands, there may have been minor impacts to the grid layout or views and vistas.

The extent to which self-assessments of actions are undertaken against the National Heritage values of the Park Lands is unknown, as there is no requirement to submit them to the relevant planning authority as part of the State's approvals process. As such, it is difficult to assess whether this process is being undertaken in a rigorous manner across all actions within the boundary or in the immediate vicinity of the National Heritage boundary of the Park Lands.

Table 1 – Summary of past referrals to the Commonwealth for the National Heritage listed Park Lands

REF No.	Project Title	Project Type	Address	Person proposing the action	Description	Referral Decision	Decision Date
2009/4697	Coast to Coast Light Rail - City West to Adelaide Entertainment Centre	Transport – land	Victoria Square, North Terrace and Port Road, Adelaide	Department for Transport, Energy and Infrastructure	To extend Adelaide's existing light rail (tram) network from City West to the Adelaide Entertainment Centre	Not a controlled action	9/02/2009
2009/4848	Café in Rundle Mall	Commercial development	Rundle Mall, Adelaide	Adelaide City Council	Construction of a free-standing café in the eastern end of Rundle Mall	Not a controlled action	13/05/2009
2009/4948	Adelaide Central Reinforcement Program	Energy Generation and Supply (non-renewable)	Port Road, Adelaide	Electranet SA	Construction of substation and 18km of underground cable	Not a controlled action	13/08/2009
2010/5542	O'Bahn City Bus Route	Transport – land	Hackney Road, Adelaide	Department for Transport, Energy and Infrastructure	To construct new express bus lanes in the centre of Hackney Road and a combination of kerbside and centre land alignments through the CBD	Not a controlled action	19/07/2010
2011/6223	Adelaide Oval Redevelopment	Tourism and Recreation	Adelaide Oval, War Memorial Drive, North Adelaide	Boulderstone Pty Ltd	To redevelop Adelaide Oval, including expanding the eastern and southern grandstands to increase seating capacity, realigning pedestrian access and new landscaping works	Not a controlled action	19/01/2012
2012/6679	Adelaide High School Redevelopment	Commercial development	West Terrace, Adelaide	JPE Design Studio Pty Ltd	To undertake redevelopment works to the Adelaide High School complex on West Terrace, Adelaide, including the provision of a new Learning Centre, car parking and associated landscape works	Not a controlled action	11/01/2013

REF No.	Project Title	Project Type	Address	Person proposing the action	Description	Referral Decision	Decision Date
2013/6723	Riverbank Precinct Pedestrian Bridge	Tourism and Recreation	Torrens River, Adelaide	McConnel Dowell Constructors Australia Pty Ltd	To construct a new pedestrian bridge across the River Torrens in Adelaide, South Australia	Not a controlled action	12/02/2013
2015/7601	O'Bahn City Access Project	Transport – land	Gilberton to Adelaide CBD	McConnell Dowell Constructors (Aust) Pty Ltd	To extend the O'Bahn public transport corridor from Gilberton to the Adelaide CBD	Not a controlled action	15/12/2015
2016/7849	Adelaide Festival Plaza Precinct Upgrade	Commercial Development	King William Road, Adelaide	Lend Lease Building Contractors Pty Ltd	To redevelop the Festival Plaza and neighbouring public spaces, and upgrade the Festival Centre	Not a controlled action	28/02/2017
2017/7945	Adelaide Festival Plaza	Commercial Development	Adelaide Festival Centre, King William Street, Adelaide	Walker Riverside Development Pty Ltd	To redevelop the Adelaide Festival Centre Plaza with a new five storey below ground car park (with connection to New Parliament House), new 26 storey commercial tower, 2-3 storey retail buildings and upgrades to the surrounding public realm	Not a controlled action	15/06/2017

3.8 Process for Assessment of National Heritage Values and Referral to Commonwealth

3.8.1 Referral Process

Actions to or in the vicinity of a place of National Heritage significance should be assessed in relation to potential impacts. This process is through a self-assessment process outlined in Section 3.8.2 (below). Section 4.2 provides recommendations for policy to be developed to address certain areas, where proposals may need to undertake a self-assessment process. The person appointed with the responsibility for a proposed action needs to undertake the self-assessment.³¹

If following completion of the self-assessment process, it is concluded that a particular action is likely to have a 'significant impact' on the National Heritage listing of the Park Lands, or if you are unsure, you should refer the action to the Commonwealth Government Environment Minister (Minister).³² The EPBC Act referral process is illustrated in Figure 10 below.

Penalties apply for not referring an action that will have, or is likely to have, a significant impact on the National Heritage listing of the Park Lands. Referral forms and further guidance can be found on the Department's website or through contacting their community information unit on 1800 803 772.³³

After receiving a referral the Minister will decide if the action is likely to have a significant impact on a matter of national environmental significance. If the Minister decides the action is likely to have a significant impact on the National Heritage listing of the Park Lands, the action will require approval under the EPBC Act (it is a controlled action). If the Minister decides that the action is not likely to have a significant impact on the National Heritage listing of the Park Lands, the action does not require approval under the EPBC Act (it is not controlled action). A third category of decision allows the Minister to decide that an action is not likely to have a significant impact on the National Heritage listing of the Park Lands, because it will be undertaken in a 'particular manner'.

If the action requires approval under the EPBC Act, an environmental assessment is required to be undertaken. If the 'Approval Bilateral Agreement' was in place (refer Section 3.5), the action could be assessed by the South Australian Government, using the accredited process under that agreement.³⁴

After considering the environmental assessment report, the Minister decides whether to approve the action and what conditions (if any) to impose. The EPBC Act assessment and approval process is illustrated in Figure 11 below.

³¹ Department of Environment and Energy 2018f

³² Department of Environment 2013:27-28

³³ Department of Environment and Energy 2018d

³⁴ Department of Environment and Energy 2018d

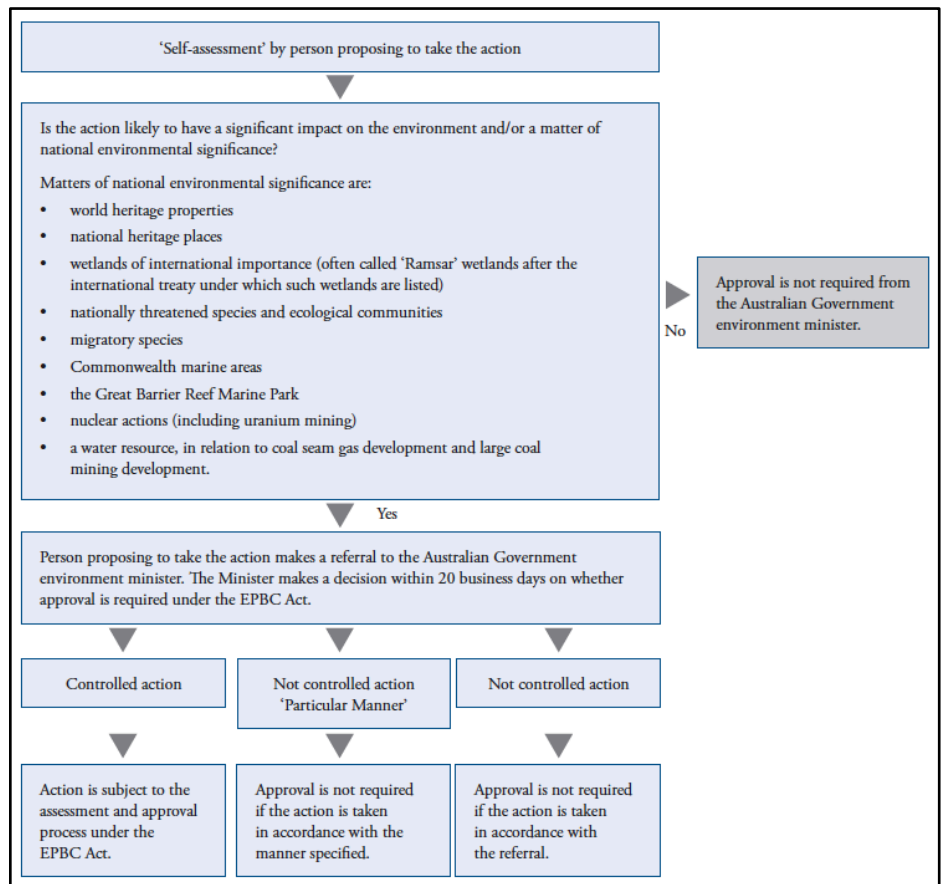


Figure 10 – EPBC Act referral process [Source: Department of Environment 2013:27]

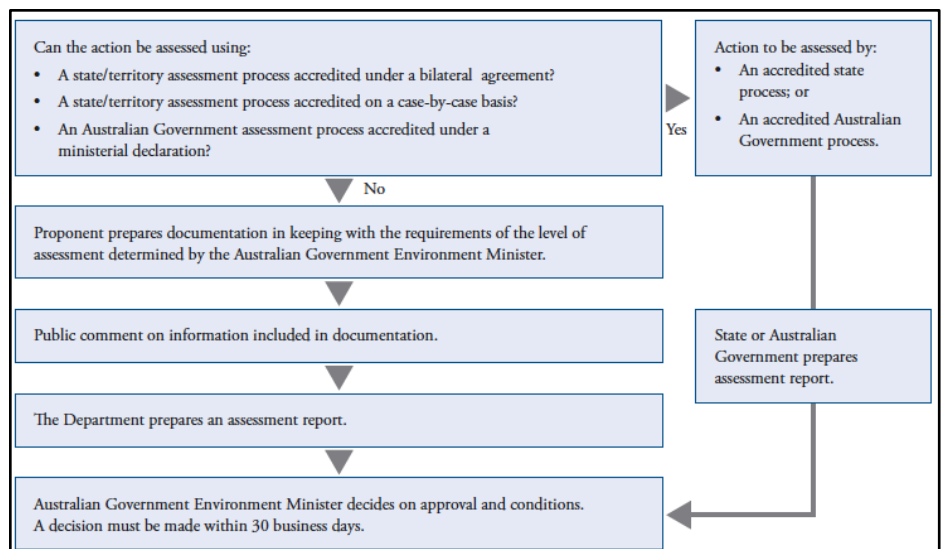


Figure 11 – EPBC Act assessment and approval process [Source: Department of Environment 2013:29]

3.8.2 Self-Assessment

The following step-by-step assessment process has been prepared to assist with any action within the National Heritage boundary of 'Adelaide Park Lands and City Layout' listing (or in the vicinity), whether defined as 'development' or not. This process follows steps outlined in the 'Matters of National Environmental Significance: Significant Impact Guidelines'.³⁵ Examples provided are not intended to be comprehensive, nor replace more detailed procedures that would be established as part of the preparation of a Heritage Management Plan for the Park Lands National Heritage listing. The same process can be applied in the review of any management plans and strategies.

Step-by-step Assessment Process

Aim: To undertake a self-assessment of an action to determine if a referral to the Commonwealth Government is required and to ensure that actions to or in the vicinity of the Park Lands National Heritage place are sufficient to mitigate potential impacts to National Heritage values

Requirement: Under the EPBC Act any action that a person takes that may result in a 'significant impact' to the 'national environmental significance' of a National Heritage place is considered a 'controlled action' and it requires approval from the Commonwealth Environment Minister. The EPBC Act requires persons undertaking the action to complete a 'self-assessment' to determine whether a referral is required.

Definitions: A summary of the definitions are provided below – refer to guidelines for further information.³⁶

Action – 'Action' is broadly defined in the EPBC Act and includes: a project, a development, an undertaking, an activity or a series of activities, or an alteration of any of these things. Actions include, but are not limited to: construction, expansion, alteration or demolition of buildings, structures, infrastructure or facilities, earthworks and vegetation clearing.

Controlled action – If the proposed action is likely to be significant, it is called a 'controlled action'. Consequently, the proposed action will require approval under the EPBC Act and is subject to further assessment and approval processes by the Commonwealth Environment Minister.

Matters of National Environmental Significance – National Heritage places are one of many matters of 'national environmental significance'.

Referral – 'Referral' of an action involves filling out a referral form and sending it to the Department of Environment and Energy. A referral identifies the person proposing to take the action and includes a brief description of the proposal, project location, nature and extent of potential impacts and proposed mitigation measures.

Significant impact – A 'significant impact' is an impact that is important, notable or of consequence, having regard to its context or intensity. Whether or not an action is likely to have a significant impact depends upon the sensitivity, value and quality of the environment that is impacted, and upon the intensity, duration, magnitude and geographic extent of the

³⁵ Department of Environment 2013

³⁶ Department of Environment 2013:2-3; Department of Environment and Energy 2018d

impacts. All of these factors should be considered when determining whether an action is likely to have a significant impact on matters of national environmental significance.

Steps in self-assessment process:

1. Is the area of the proposed action located within the boundary, or in the immediate vicinity, of the National Heritage listing for the 'Adelaide Park Lands and City Layout'?

Download the 'Location and Boundary Map' here:

<http://www.environment.gov.au/heritage/places/national/adelaide-parklands>

Note: The 'area of the proposed action' is broader than the immediate location where the action is undertaken. Consider whether the Park Lands National Heritage listing is adjacent to the immediate location that may potentially be impacted. Other works may be downstream or upstream of the River Torrens, but actions may impact on the riparian areas within the Park Lands National Heritage boundary.

Example: Is there potential for the action, whether within the boundary or in the immediate vicinity of the Park Lands, to impact on the identified views and vistas in the Park Lands National Heritage listing?

Yes / No

[Identify location and extent of activity area on Park Lands National Heritage map](#)

2. Considering the proposed action at its broadest scope, is there potential for impacts or indirect impacts, to affect the National Heritage values of the 'Adelaide Park Lands and City Layout'?

Note: Consider all stages and components of the action, and all related activities and infrastructure in terms of scope of work.

Example: Particular actions, unless appropriate mitigations measures are in place, may have the potential to impact on National Heritage values even if works are not located within the boundary of the listing, such as incremental impacts (i.e. views and vistas). See Table 2 below for examples of actions.

Yes / No

[Provide map of Park Lands National Heritage listing boundary and location of proposal](#)
[Provide discussion of potential impacts](#)

3. Are there any proposed measures to avoid or reduce impacts of proposed actions to the National Heritage values of the 'Adelaide Park Lands and City Layout'?

Note: If so, is the effectiveness of these measures certain enough to reduce the level of impact below the 'significant impact' threshold?

Example: If the project has not established this level of detail, list aspects that may require mitigation measures to be established to deal with identified or potential impacts, explain the process for developing and issuing these measures, and the process for their review as part of the State approvals process.

Yes / No

[Discuss proposed mitigation measures](#)

4. Are any impacts of the proposed action to the National Heritage listing of the 'Adelaide Park Lands and City Layout' likely to be significant impacts? Will the action:

- a) permanently remove, destroy, damage or substantially alter the fabric of a National Heritage place in a manner which is inconsistent with relevant values?
- b) extend, renovate, refurbish or substantially alter a National Heritage place in a manner, which is inconsistent with relevant values?
- c) permanently remove, destroy, damage or substantially disturb archaeological deposits or artefacts in a National Heritage place?
- d) involve activities in a National Heritage place with substantial and/or long-term impacts on its values?
- e) involve the construction of buildings or other structures within, adjacent to, or within important sight lines of, a National Heritage place which are inconsistent with relevant values?
- f) make notable changes to the layout, spaces, form or species composition of a garden, landscape or setting of a National Heritage place in a manner which is inconsistent with relevant values?
- g) restrict or inhibit the continuing use of a National Heritage place as a cultural or ceremonial site causing its values to notably diminish over time?
- h) permanently diminish the cultural value of a National Heritage place for a community or group to which its National Heritage values relate?
- i) destroy or damage cultural or ceremonial, artefacts, features, or objects in a National Heritage place?
- j) notably diminish the value of a National Heritage place in demonstrating creative or technical achievement?

Note: Significant impacts are those that are important, notable or of consequence, having regard to their context or intensity. The assessment should be undertaken with reference to these questions (relevant to historic heritage places) and considering the identified heritage values under each criterion for the Park Lands National Heritage place.

Yes / No

If yes, provide discussion of potential significant impacts and summarise relevant mitigation measures

If no, provide discussion of how impacts are not considered to be significant impacts

Table 2 – Examples of actions that would or would not require a self-assessment³⁷

CATEGORY A ACTIONS Actions that should be self-assessed in terms of their impacts to the National Heritage values of the Park Lands, and that may require referral	CATEGORY B ACTIONS Actions that are unlikely to have any impact on the National Heritage values of the Park Lands, and would not likely require a self-assessment
Significant infrastructure, such as rail, tram, helipad	Minor infrastructure, such as street furniture, lighting or traffic lights
Change of land use and associated landscape character	Below ground infrastructure, including cabling, pipelines & water recycling outlets
Major road alignment or widening and new roads, including elevated roads	Small sized signage, including Council signage

³⁷ List provided by DEW and amended by authors

CATEGORY A ACTIONS Actions that should be self-assessed in terms of their impacts to the National Heritage values of the Park Lands, and that may require referral	CATEGORY B ACTIONS Actions that are unlikely to have any impact on the National Heritage values of the Park Lands, and would not likely require a self-assessment
Permanent road closures	Interpretative or way-finding signage
New buildings and additions to existing buildings (greater than 30m ²)	New pedestrian or bicycle paths (less than 1.5m wide)
New bridges or footbridges	Visually permeable fencing
Open air car parks	Post-event landscape remediation works
Any new development within the squares, including buildings, structures, fences and plazas	Maintenance of existing buildings (i.e. reroofing, painting) or minor works (i.e. installation of solar panels)
Extensive landscaping, including additional hard surfaces, or new or enlarged areas of biodiversity management	Installation or maintenance to sport or exercise equipment, including goal posts and oval markings
Utilities infrastructure, including above ground pipelines and telephone towers	Minor landscaping (i.e. planting and paving in association with a redesigned playground or returfing an existing oval)
Any development described in an approved master plan	Toilet blocks (if in accordance with COA design guidelines)
Public artworks, monuments, statues and plaques	Minor riparian works, such as replanting aquatic vegetation, installing bird netting or pollutant traps
Land division	Temporary structures for events
Major changes to the River Torrens basin or other major riparian works	
Any encroachment in the street grid	
Solid fencing	
Large loss of open green space	
Land use adjacent to the Park Lands that may impact on views and vistas (e.g. building height limits)	

5. Is a referral required under the EPBC Act in relation to a potential significant impact to the National Heritage values of the 'Adelaide Park Lands and City Layout'?

Note: If question 2 identified no potential for impacts to the National Heritage listing of the 'Adelaide Park Lands and City Layout', there is no need to undertake a referral under the EPBC Act. **The final determination as to whether a referral should be undertaken remains vested in the persons undertaking the action.** A referral may be desirable for the following reasons:

- due diligence, as heritage assessments are subjective, and a referral would provide certainty to project outcomes; and
- risk management, especially for high profile or large scale developments, where an EPBC Act referral pre-construction phase can minimise potential delays following commencement of site works.

Yes / No
Provide discussion

4.0 Analysis of Use and Potential Impacts

This section reviews the extent to which ‘use’ in the Park Lands may impact on the National Heritage values. It considers if there is any risk of cumulative and incremental impacts, identifies key issues that may require policy development to manage potential impacts, and discusses opportunities to enhance or conserve the heritage values of the National Heritage place. Several case studies are included to highlight particular matters.

4.1 Uses in the Park Lands

Various management plans detail existing uses in the Park Lands, and some discuss trends and demands for areas of informal recreation, events and organised sports, and proposed hubs (micro to major in scale and intensity).

The 2015 Management Strategy also has a landscape character approach to describe different areas of the Park Lands, based on their current use and vision for future use, such as:³⁸

- Woodland: open woodland, grassland;
- Formal Park: gardens, parks, paved plazas;
- Sport and Recreation: ovals, pitches, courts, associated amenities and multi-purpose buildings, areas for informal recreation;
- Riparian: creeks, rivers, wetlands, lakes, stormwater detention basin; and
- Urban Address: structured & designed perimeter, pedestrian & cycle links.

Specific uses of the Park Lands have the potential to impact on the National Heritage values of the place in several ways:

- differing uses have differing impacts on the visual qualities and landscape characteristics of the place; and
- differing uses have social and cultural associations for the community.

Uses within the Park Lands have changed over time, some in response to the growing demands of a modernising capital city, some to changing cultural and social trends. Some of these changes have contributed to, and reinforced, what is now recognised as a place of National Heritage significance, while others have had an adverse impact. Understanding the impacts of use on social and cultural associations and landscape characteristics will be important to managing the National Heritage values of the Park Lands. It is similarly important to recognise that these trends are not static, but evolve in a dynamic fashion in response to cultural, social, economic and technological factors. As a result, any social and landscape analysis should also monitor such trends and consider whether they too are consistent with the heritage values of the place.

Many of the attributes associated with use are discussed under **criterion (g)** of the National Heritage listing: recreation areas, sports grounds, gardens and public facilities. Different ‘spaces’ within the Park Lands provide areas for

³⁸ City of Adelaide 2015:30-35,40

different uses and activities. Some spaces have multiple uses, such as sports fields accommodating informal recreation at other times and events at certain times.

The breakdown of different uses is being tracked in annual reports to APLA and COA on the 'State of the Park Lands'. The reports prepared to date include a pie graph on areas within the Park Lands with a breakdown on different recreation and sporting uses, and all other uses in the Park Lands with their spatial analysis. These and other reports have generally categorised uses in the Park Lands as follows: ³⁹

- **informal recreation** (i.e. parks, gardens, plazas, woodland, grassland, playgrounds, walking tracks, dog park, biodiversity and riparian areas);
- **recreational destinations** (Adelaide Aquatic Centre, Adelaide Botanic Garden, Adelaide Oval, Adelaide Zoo, National Wine Centre, North Adelaide Golf Links);
- **organised sports and schools' sports** (i.e. sports' courts, ovals and pitches, and associated infrastructure, including Adelaide Bowling Club);
- **events** (i.e. Adelaide Festival and Fringe, Carols by Candlelight, Adelaide-500, Pedal Prix, Splash Adelaide, Tour Down Under, WOMADelaide);
- **commercial offerings – kiosks & restaurants** (i.e. Adelaide Pavilion, Simpson Kiosk, Fig Tree Cafe);
- **roads** (that form the city grid);
- **other – car parking**;
- **other – cemetery** (West Terrace Cemetery); and
- **other – school** (Adelaide High School).

It is not within the scope of this report to undertake a detailed analysis of the evolving uses of the Park Lands, their trends, or the impact of these uses and trends on the National Heritage values of the place. Such an assessment may include:

- mapping historic uses of the Park Lands for key periods of the city's development based on historic research and aerial photography;
- identifying historic trends for changing uses, and assessing their impact on the currently recognised National Heritage values of the place;
- projecting trends for changing uses based on historical data;
- Assessing the impact of projected trends on the National Heritage values of the place;
- identifying projection 'bandwidths' for current uses which remain consistent with the National Heritage values of the place;
- monitoring uses within the Park Lands on a regular basis (for example every 5 years) against the projected bandwidths. This review would also include reassessing whether the projected bandwidths remain consistent with the evolving social and landscape attributes of the National Heritage place; and
- establishing protocols for any exceedance of the projected bandwidths to ensure the preservation of the social and landscape National Heritage values of the place.

³⁹ These categories are based on those identified in the 2015 Management Strategy and the 2014 Visitor Research Study.

The Landscape Character Map below is an example of the potential mapping of uses within the Park Lands, which could form the basis for this comparative analysis and trend projection. It categorises uses based on social and cultural importance and impacts on the landscape qualities on the place as follows (refer **Appendix D** for a breakdown of areas under each category):












1. **built structures;**
2. **car parking;**
3. **roads;**
4. **utilities;**
5. **formal landscape;**
6. **semi-formal landscape;**
7. **informal landscape;**
8. **biodiversity areas;**
9. **riparian areas;**
10. **sport and recreation areas – hard surface;**
11. **sport and recreation area – turf surface.**

Note: Event areas are not mapped. Reference should be made to COA's Event Management Plan that includes mapping of current events and preferred areas for future events.

Note: The Riverbank and Institutional Precincts, rail corridors, minor roads and land parcels that do not form part of the National Heritage listing, and land on the outer boundary of the listing, are left white on the map.



Legend

- | | | | |
|---|----------------------------------|---|------------------------------------|
|  | Built Structures |  | Semi Formal Landscapes |
|  | Car Parking |  | Informal Landscapes |
|  | Roads |  | Sport & Recreation - Hard Surfaces |
|  | Riparian Areas |  | Sport & Recreation - Turf Surfaces |
|  | Bio-diversity Conservation Areas |  | Utilities |
|  | Formal Landscapes | | |

Adelaide Parklands and City Layout

dasharchitects

Landscape Character Map



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4.2 Key Issues in Managing Potential Impacts

A high-level review of the management and policy documents for Park Lands has identified the following key issues that may require further policy development to manage potential impacts on the National Heritage values of the place:

Documentation and Process

- There is no dedicated agency to manage and improve the Park Lands as a whole;
- The lack of a detailed Heritage Management Plan (HMP) limits guidance on the management of the National Heritage values of the place;
- The preparation of a HMP or review other management documents for consistency with the National Heritage management principles for the Park Lands National Heritage listing, has not been identified in COA's Management Strategy;⁴⁰
- There are a multitude of documents that inform and guide the management of the Park Lands, including Community Land Management Plans, Adelaide (City) Development Plan and COA's Management Strategy. Each of these documents contribute towards managing differing aspects of the Park Lands to varying degrees. Existing Community Land Management Plans (that were prepared with limited National Heritage consideration) are at times misguidedly considered to fulfil this function, however these documents only consider a narrow understanding of the National Heritage values of the place. Other documents were not written with the intent to manage the National Heritage values of the place. This disconnect, and the absence of a HMP, can create policy tensions or conflicts between the ongoing management of the place, and the management of its National Heritage values;
- Community Land Management Plans only consider limited attributes of the National Heritage values of the place, and accordingly may provide policy recommendations that may be in tension with the broader National Heritage values of the place;
- Not all State Government agencies within the National Heritage boundary of the Park Lands have prepared Management Plans, as required under s.20 of the Adelaide Park Lands Act;⁴¹
- Exclusion of large sections of the Park Lands, such as the Riverbank and Institutional Precincts from Council custodianship and the National Heritage listing;
- DPTI's *Cultural Heritage Guidelines* (1999) are out-of-date and do not refer to the National Heritage List, which was inscribed in 2008;
- Heritage responsibilities under the EPBC Act for the National Heritage listing of the place are not mentioned under some of the COA Plans (i.e. Biodiversity and Water Quality Action Plan 2011, Sports Infrastructure Master Plan 2014) or the Community Land Management Plan;

⁴⁰ s.324X(2) of the EPBC Act

⁴¹ Pers. Comm. Martin Cook

- National Heritage places are not mentioned in the Adelaide (City) Development Plan, and there is no trigger to assess the potential impacts of proposals on the National Heritage values of the Park Lands;
- There is a lack of integration between the Adelaide (City) Development Plan and various other Management Plans and Strategies, which leads to a lack of connection between APLA advice and COA's Assessment Panel and State Commission Assessment Panel decision-making process;
- There is a lack of integration and consistency between policy applied to COA's administration assessment of proposals, APLA's Assessment, Elected Member Assessment and COA's Assessment Panel (and State Commission Assessment Panel) assessments;
- The cumulative effect of minor activities with the Park Lands, that in themselves may neither trigger the need for a self-assessment under the EPBC Act, or would be considered to not be a 'controlled action' under such an assessment, may have overall impacts to the National Heritage values of the place (refer Section 4.3 for further information);
- There is a lack of awareness of different land managers (and potentially facility managers) in terms of their responsibilities for managing the National Heritage values of the place under their control, and incorporating these responsibilities into their processes and policies;
- There is a lack of clear strategy and direction in managing leases with Park Lands in relation to community accessibility, and managing the cumulative effect of restricted access of such facilities;
- There is a signed 'Assessment Bilateral Agreement' (2014) between the Commonwealth and State Government relating to environmental assessment, however there is no signed 'Approval Bilateral Agreement'; this means that potential impacts to the Park Lands National Heritage values are not being assessed through any approval authority unless they are referred to the Commonwealth Government; when applications are referred, the process does not appear to impose conditions unless they are considered to be 'controlled actions';⁴²
- There is a lack of understanding of when a self-assessment is required against the National Heritage values, and a lack of transparency in the process;
- There is a general lack of rigour in the self-assessment process against the gazetted National Heritage values, and a general lack of mitigation measures;
- The voluntary nature of the self-assessment process against National Heritage values with no integration with the State's planning system;
- The extent and specifics of any heritage values attributable to views and vistas associated with Park Lands is neither well defined by the National listing, nor generally understood. This raises the risk of actions or development not being appropriately assessed against impacts to these potential National Heritage values;
- There is a lack of appreciation of potential actions that may have impacts on the National Heritage values of the Park Lands, which may include:
 - o use (permanent or temporary, expanded or new, hard or soft surface);

⁴² Department of Environment and Energy 2018c

- alteration of the place (infrastructure upgrades (stormwater, roads), landscaping, expanded existing use);
- additions to the place (buildings, structures, infrastructure, artworks);
- alienation (restriction on access / use, further excised land);
- impacts on views and vistas from and to the National Heritage place.

Use and Management

- Achieving an appropriate balance of use and landscape character that is consistent with the heritage values of the place. Trends of these attributes should be tracked, projected and monitored to account for the impact of cumulative incremental change (refer Section 4.1);
- Impacts of temporary events within the Park Lands, large or small, short term or long term. These impacts include physical, visual (i.e. structures, fences, signage), social and impacts on general accessibility; and
- Consideration of any impacts associated with lease agreements within Park Lands (e.g. privatisation, restricted access, improvements).

4.3 Potential Cumulative or Incremental Impacts

A cumulative impact is one that is the result of past and current activities, which over time is combined to collectively impact the environment. There is potential for some cumulative or incremental impacts to have an adverse impact on the National Heritage values of the Park Lands, such as:

- alienation of the Park Lands, which generally limits community access and may impact on the integrity of the grid layout, a significant component of the listing;
- long-term impacts on views and vistas identified in the National Heritage listing;
- an imbalance in the uses in the Park Lands (i.e. too much formalised sporting and recreation areas and less informal areas), which affects the overall landscape character, a significant component of the listing; and
- minor encroachments to the grid layout through road widening and other projects (i.e. Adelaide Oval redevelopment, Adelaide High School redevelopment), that are not being considered in EPBC Act referrals as having a potential impact to the National Heritage values of the Park Lands, and which may affect the integrity of the overall plan.

Tracking cumulative impacts is an important factor in the ongoing management of the heritage values of the place. It is recommended that this be undertaken with specific reference to the National Heritage listing boundary of the Park Lands in a methodical and measured fashion that considers:

- potential impacts;
- historical trends;
- projected trends, with established 'bandwidths' that are considered to be consistent with the heritage values of the place;
- periodical review of both the cumulative effect of potential impacts; and
- periodical review of projections and 'bandwidths'.

This analysis is outlined in more detail in Section 4.1 of this report.

4.4 Opportunities to Enhance or Conserve National Heritage Values

The following opportunities have been identified to enhance or conserve the National Heritage values of the Park Lands:

- improved interpretative signage and other media;
- enhanced landscape treatment, such as tree planting;
- identification and protection of significant views and vistas;
- reinstate portions of alienated Park Lands (i.e. railway yards along River Torrens, car park on the bank of the River Torrens in Helen Mayo Park, and the large hard surface in Edwards Park, Park 23, on Anzac Highway);
- improve the 'green link' on the northern side of Port Road between West Terrace and James Congdon Drive; and
- reassessment of the National Heritage listing to correct minor errors and to potentially identify other aspects of its National heritage significance.

Many of these opportunities are already acknowledged in COA's Management Strategy. While there appears to be a general consistency between the Park Lands Management Strategy and the National Heritage values of the place, such consistency can only be to a 'high level' in the absence of a detailed HMP for the place. It is recommended that the Management Strategy be reviewed and updated following completion of the HMP for the Park Lands National Heritage listing.

The 2011 Landscape Master Plan by Taylor Cullity Lethlean discusses the protection of key views and vistas through the Park Lands through their identification in relation to the National Heritage listing and recommendations to enhance views from roads and paths to highlight the landscape character.

⁴³ This work would be clearly assisted by the HMP for the place.

Several areas of lost park lands have already been reinstated, including former SA Water land and South Australian Cricket Association building and car park removal from Car Park 25. There are opportunities to reinstate other alienated areas of the Park Lands through greening and landscaping sites, such as the former railway yards along the River Torrens and areas of Lot Fourteen (Former RAH site). There may be further opportunities to improve the central western edge of the Park Lands along Port Road where there is a 'lost' link in the greenbelt with the new Royal Adelaide Hospital, Adelaide Gaol and Thebarton Police Barracks. Reinstating alienated land and improving links through the Park Lands and to the surrounding suburbs was identified as strategies and actions under the Management Strategy. ⁴⁴

Further research, consultation and assessment can consider if there are other aspects of significance of the Park Lands, such as a special association of Edward Wakefield (**criterion h**) or Aboriginal significance (*criterion i*). Minor corrections would include the accurate name of the 'Adelaide Park Lands Preservation Association' and that Adelaide was the first place in Australia to be developed as a free settlement 'without the use of convict labour'.

⁴³ Taylor Cullity Lethlean 2011:13,18

⁴⁴ City of Adelaide 2015:20

5.0 Recommendations and Policy Development

This Section identifies recommendations to improve the understanding and management of the Park Lands' National Heritage listing, and areas to develop policy and guidance as part of a Heritage Management Plan for the place.

5.1 Recommendations

This report has identified several issues and opportunities associated with the management of the National Heritage values of the 'Adelaide Park Lands and City Layout'. The most important issues to address are to:

- prepare a comprehensive Heritage Management Plan to guide the protection and management of the Park Lands' National Heritage listing;
- improve the understanding of what the National Heritage values are for the Park Lands for all land managers;
- ensure that all land managers of the Park Lands' National Heritage listing have appropriate policy and processes in place to protect and manage the National Heritage values, and that all land managers understand their obligations under the EPBC Act; and
- improve the rigour in the self-assessment processes of actions that may affect the Park Lands National Heritage values.

Many of the issues identified in Section 4.2 of this report already form part of COA's Management Strategy. However, there is still a lack of integration between the Adelaide (City) Development Plan and other COA management plans in terms of managing the Park Lands' National Heritage values.⁴⁵

Furthermore, around 89% of the Park Lands' National Heritage listing is managed by COA, with other land managers potentially applying different priorities and strategies. The extent to which these other strategies similarly have regard to the National Heritage values of the place is unknown.

The first priority should be the preparation of a detailed Heritage Management Plan (HMP) for the Park Lands' National Heritage listing, which will underpin and inform the management strategies and various management plans of all land managers within the National Heritage boundary, or whose activities may impact on the National Heritage values from outside the boundary. The HMP will provide clear guidance and a well-defined framework for the management of the National Heritage values of the place, including policy to guide actions of potential heritage impacts, such as use, alteration of the place, additions to the place, further alienation and impacts on views and vistas.

Existing management strategies, management plans, Development Plans and CLMPs, should be reviewed and updated as necessary following the preparation of the HMP to both better recognise the National Heritage values of

⁴⁵ Management Plans prepared for the Park Lands by State Government agencies were not reviewed as part of this project, however they should be as part of any HMP for the place.

the Park Lands and identify any tensions or conflicts in policy that may be contrary to these values.

Recommendations are provided below to improve the process and impact assessment against the National Heritage values for any actions in the Park Lands' National Heritage listing or in the vicinity.

Recommendation: Seek funding to prepare a detailed Heritage Management Plan (HMP) for the National Heritage listing of the 'Adelaide Park Lands and City Layout' in accordance with the 'Managing National Heritage Places' guidelines. The HMP should include targeted stakeholder consultation, including but not limited to:

- Heritage South Australia, DEW;
- City of Adelaide (relevant departments);
- Adelaide Park Lands Authority;
- all other land managers within the boundary of the National Heritage listing;
- major facility managers (i.e. Adelaide Oval Stadium Management Authority);
- Adelaide Park Lands Preservation Association; and
- relevant Aboriginal groups.

Recommendation: Develop policy, procedures and guidelines to help all land managers of the Park Lands' National Heritage listing understand their obligations under the EPBC Act, what activities require self-assessment against the National Heritage values of the 'Adelaide Park Lands and City Layout' and the steps required for impact assessment. This should include that heritage impact assessment be undertaken by a suitably qualified heritage professional, and the assessment should be thorough in considering all actions against the identified National Heritage values and provide detailed mitigation measures to ensure potential issues are alleviated (where required). This policy should be disseminated to all land managers and available to applicants that undertake works within the boundary of the Park Lands' National Heritage listing. APLA may have a role in this process under their current terms of reference.

Recommendation: COA should develop policy and procedures around the assessment of National Heritage values for the Park Lands for all actions, including those not classified as development. These policies should be documented in Council's reports to APLA and SCAP, and within the Council to ensure that appropriate assessment processes are undertaken and that this information is provided in a clear manner to decision makers. Any policy should ensure that development in the vicinity of the Park Lands is appropriately assessed in terms of potential impact to the National Heritage listing (i.e. road or open space encroachment).

Recommendation: COA may consider the preparation of Heritage Impact Assessment guidelines in relation to National, Commonwealth, State and Local Heritage places in the Adelaide CBD. [See **Case Study 2**]

Case Study 2 – City of Newcastle HIS Guidelines: The City of Newcastle in NSW has prepared their own Heritage Impact Assessment (HIA) guidelines, which state when a Heritage Impact Statement (HIS) is required, why it is required, and what minimum information should be included. The form and content of any HIS should be noted in accordance with the NSW Heritage Branch guidelines.⁴⁶

Noting the number and level of heritage places within the Adelaide CBD, City of Adelaide may like to consider the preparation of similar HIA guidelines that refer to the South Australian HIS guidelines (2013).

Recommendation: DPTI should review and update their environmental impact assessment guidelines, and other relevant guidelines, used for major development in South Australia to ensure that appropriate guidance is provided in relation to impact assessment of National Heritage places. For example, DPTI's *Cultural Heritage Guidelines*, which are referred to in Section 6.5.1 – Non-Aboriginal Heritage of the *Environmental Approval Procedures* guideline were published in 1999, and they refer to the Register of the National Estate, which was closed in 2007. There is no mention in the guidelines of the National Heritage List which was created in 2003.⁴⁷

Recommendation: DEW to liaise with the Commonwealth Government to determine the status of the 'Approval Bilateral Agreement' between State and Commonwealth authorities in relation to ensuring that relevant provisions in the EPBC Act are established in the South Australian planning system (i.e. for National Heritage places), and to develop a strategy to sign the Approvals Bilateral Agreement and to establish process and timeframes to integrate the process into the current and new SA planning system.

Recommendation: Existing management strategies, management plans, Development Plans and CLMPs, should be reviewed and updated as necessary following the preparation of the HMP to both recognise the National Heritage values of the Park Lands, and to identify and rectify any tensions or conflicts in policy that may be contrary to these values. This applies to all land managers of the Park Lands National Heritage listing, and Development Plans and CLMPs of Councils that abut the external boundary of the 'Adelaide Park Lands and City Layout' National Heritage place.

Recommendation: Review merits of including the identification of National Heritage listings in planning documents and portals, such as the Adelaide (City) Development Plan or the pending Planning and Design Code, to assist in identifying owner and proponent obligations under the EPBC Act, especially in relation to step 1 in the self-assessment process. This could include recognition of National Heritage places in mapping, such as illustrated in Figure 12, and to ensure that processes for impact assessment of development against National heritage values are in place. [See **Case Study 3**].

⁴⁶ Newcastle City Council 2010; NSW Heritage Office 2005

⁴⁷ Department of Environment and Energy 2018e; Transport SA 1999

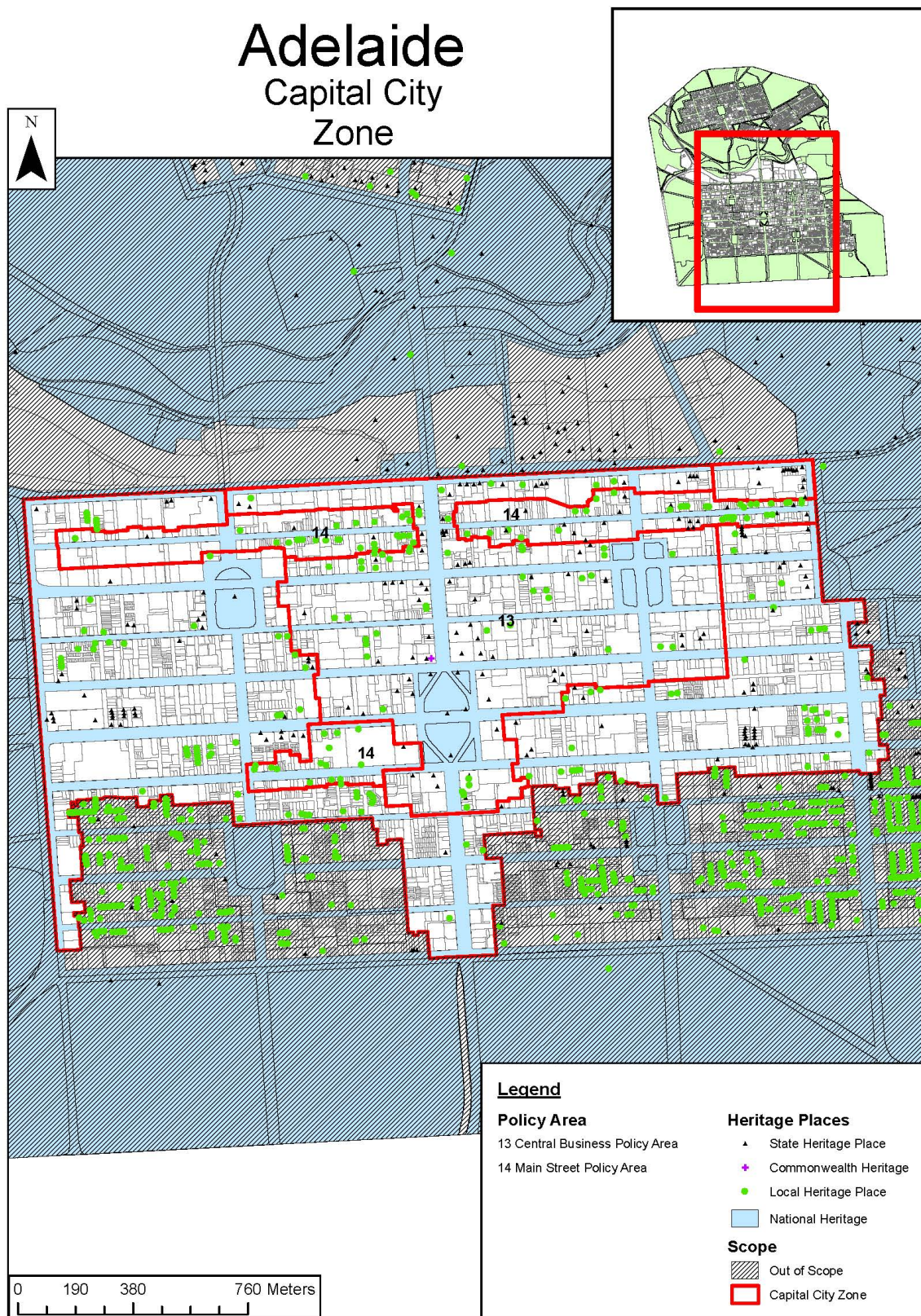
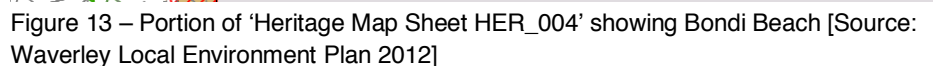


Figure 12 – Example of new map for Capital City Zone in the Adelaide (City) Development Plan showing National, State and Local Heritage places [Source: Lucas Trevisan, for Heritage South Australia, DEW 2018]

The area that encompasses Bondi Beach has a Local [I503], State [I94] and National [I93] Heritage listing, all of which are listed in Schedule 5, Part 1 – Heritage Items in the Waverley Local Environment Plan 2012. Standard heritage provisions in the LEP (5.10) refer to “the environmental heritage of Waverley”. Provision 5 refers to the ability of the ‘consent authority’ to request a ‘heritage document’ that considers heritage impacts. Figure 13 is a map showing how heritage items are identified under the LEP for Bondi Beach.

This Case Study identifies two ways that the National Heritage listing for Bondi Beach is identified under the local planning scheme and the online State Heritage List.



5.2 Key Issues and Opportunities for the HMP

This high-level report into the issues and opportunities associated with the National Heritage listing of the 'Adelaide Park Lands and City Grid Layout' has identified the following matters for consideration in the preparation of a Heritage Management Plan (HMP) for the place:

- Provide clarity to the National Heritage values of the Park Lands and its attributes that contribute towards those values, including understanding what views and vistas within and to the Park Lands are intrinsic to the National Heritage values of the place;
- Establish and guide appropriate uses within the Park Lands that are consistent with the National Heritage values;
- Identify any current attributes that diminish the National Heritage values of the Park Lands and provide policy and guidance for their mitigation or remediation;
- Establish a monitoring program in relation to uses in the Park Lands to assess potential cumulative impacts to the landscape character, views and vistas and alienation of land from the Park Lands against the National heritage values;
- Identify any procedural gaps and risks in assessing potential National Heritage impacts for the Park Lands;
- Limit further alienation of the Park Lands and provide opportunities to return alienated land to the Park Lands;
- Develop policy and guidance to conserve the grid pattern of Light's 1837 plan;
- Develop policy and guidance for built form, scale, footprint and material of new buildings or structures in the Park Lands, and shared facilities;
- Develop policy and guidance for new hard surface areas, such as promenades, plazas, hubs and car parking;
- Develop policy and guidance in relation to accessibility to facilities and spaces within the Park Lands;
- Develop policy and guidance for managing potential heritage impacts associated with leasing agreements within the Park Lands;
- Develop policy and guidance for assessing the potential heritage impacts associated with the installation of new artworks, monuments, statues and plaques in the Park Lands;
- Develop policy and guidance for managing potential heritage impacts associated with events within the Park Lands;
- Develop policy and guidance to improve opportunities for interpretation of the Park Lands' National Heritage values.

6.0 Heritage Management Plan Structure

This Section provides an understanding of what a Heritage Management Plan is and an indicative report structure for a Heritage Management Plan for the Park Land's National Heritage listing.

6.1 What is a Heritage Management Plan?

The Commonwealth Department of Environment and Energy recommend that “all National Heritage places develop a management plan”. It further recommends that “...all relevant staff and those involved in the management of the place should be trained in the use and implementation of the management plan.” Particular events may also trigger the review of a management plan, such as any major change to the place.⁴⁸

Further, the EPBC Act states:

Section 324X(2): The Commonwealth must use its best endeavours to ensure a plan for managing the place, that is not inconsistent with the National Heritage management principles, is prepared and implemented in co-operation with the State or Territory.

Section 324ZB(1): The Commonwealth may give financial or other assistance for the identification, promotion, protection or conservation of a National Heritage place to:

- (a) a State or self-governing Territory in which the place or part of the place is located; or
- (b) any other person.

Schedule 5A and 5B in the EPBC Regulations detail requirements and principles for a Heritage Management Plan (HMP). There are also various Commonwealth guidelines in relation to managing National Heritage Places and preparing Heritage Management Plans.

Heritage Management Plans can be accredited by the Commonwealth Environment Minister as part of an Approvals Bilateral Agreement between the Australian and South Australian Governments. Through an accredited Heritage Management Plan and an associated Approvals Bilateral Agreement, the Commonwealth Environment Minister in-effect delegates his approval powers under the EPBC Act to the relevant State Minister.⁴⁹

⁴⁸ Department of Environment and Energy 2018f; Department of the Environment, Water, Heritage and the Arts 2008:4, *Developing Management Plans* (part)

⁴⁹ Department of the Environment, Water, Heritage and the Arts 2008:13, *Developing Management Plans* (part)

The Commonwealth guidelines define a Heritage Management Plan as:⁵⁰

...a tool intended to provide sufficient information for managers to protect and manage the heritage values (Local, State and National) of heritage places.

It is in an owner's interest to prepare a management plan to guide day-to-day management, assist in decision-making and to support local, state and Commonwealth approval processes.

A management plan should comprehensively describe the place, state its official National Heritage values and identify any other heritage listings. It should specify the objectives, policies and principles that will govern the management of the place's heritage values and provide guidance on the preparation of project proposals to ensure that there are no adverse impacts on heritage values. It may also identify areas and items that do not embody heritage values or that are intrusive, and allow these to be removed or altered without affecting the values of the place.

Broadly, the objectives of a Heritage Management Plan are to:

- review, identify, analyse, protect, conserve, present and transmit the National heritage values of the place;
- use best available knowledge, skills and standards for National heritage place management, including ongoing technical and community input to decisions and actions that may have a significant impact on their National heritage values;
- respect all the heritage values of the place and seek to integrate Commonwealth, State and Local responsibilities for the management of the place;
- develop conservation policies that are concise and user-friendly;
- make practical recommendations for the ongoing conservation, management and promotion of the place;
- ensure that the use and presentation of the place is consistent with the National heritage values;
- contribute to the community's sense of identity – its past, present and future;
- provide the basis for ongoing cultural resource management; and
- provide for regular monitoring, review and reporting on the conservation of the National Heritage values of the place.

6.2 Indicative HMP Structure

The following indicative report structure is provided for a Heritage Management Plan for the 'Adelaide Park Lands and City Layout' National Heritage listing.

Note: In 2018 DASH Architects completed a heritage assessment to consider the 'Adelaide Park Lands, Squares and City Layout' for State Heritage listing.

⁵¹ Whilst this matter is still to be considered by the South Australian Heritage Council, any such future listing should be incorporated into the HMP for the National Heritage place, so the State Heritage values are understood and managed accordingly with the National Heritage values in one consolidated

⁵⁰ Department of the Environment, Water, Heritage and the Arts 2008:3, *Developing Management Plans* (part)

⁵¹ DASH Architects 2018

report. The development assessment process outlined in the HMP should consider both listings.

Recommendation: Any future State Heritage listing for the Adelaide Park Lands should be incorporated into the Heritage Management Plan for the place.

Executive Summary

1. Introduction

- Objectives of Heritage Management Plan
- Brief description and location of National Heritage place
- Current Heritage listings for the place
- Methodology and Limitations
- Authorship and Acknowledgement
- How to use this Heritage Management Plan

2. Historical Background

- Historical overview of the settlement of South Australia
- Historical overview of the Adelaide Park Lands
- Chronology of major events associated with the place
- Summary of economic and social influences associated with the place
- Summary of geographical influences on the development of the place
- Summary of current and former uses
- Annotated list of reports on the place

3. Place Description

- National Heritage Listing and Boundary
- Land Managers
- Context of the place (Geography, Topography, Landscape Character, Parks, Squares, Grid Layout and Streets, and Views and Vistas)
- Condition and Integrity
- Framework to measure any change in condition or heritage values
- Areas for further research on the place
- Other Statutory or Non-Statutory heritage listings within the National Heritage place boundary

4. Analysis

- Thematic Analysis
- Comparative Analysis
- Views and Vistas Analysis
- Alienated Land Analysis

5. Consultation

- Land Manager Stakeholder Consultation
- Indigenous Stakeholder Consultation
- Community and User Group Consultation

6. Significance

- What is heritage significance?
- National heritage values and Statement of Significance (*official*)
- Assessment of other National Heritage values (*if relevant*)
- Discussion of the National heritage values
- State Heritage Place/Area Significance (*for whole of PLs; not*

individual listings)

7. Opportunities, Constraints and Obligations

- *Environment Protection and Biodiversity Conservation Act 1999 (Com) and Environment Protection and Biodiversity Conservation Regulations 2000 (Com)*
- *Heritage Places Act 1993 (SA) and Heritage Places Regulations 2005 (SA) (if relevant)*
- *Development Act 1993 (SA) and Development Regulations 2008 (SA) (or PDI Act/Regs if in force)*
- *Adelaide Park Lands Act 2005 (SA) and Adelaide Park Lands Regulations 2006 (SA)*
- *Adelaide (City) Development Plan (or Planning and Design Code if in force)*
- Obligations Arising from Identified National Heritage Values
- Factors Affecting the Use and Future of the Place
- Managing Impacts to the National Heritage Values
- Opportunities to Enhance National Heritage Values
- Condition, Integrity and Authenticity
- Management Framework
- Owner and Occupier Needs and Operations Requirements
- Process for making decisions about matters that may impact on National Heritage values

8. Conservation Policy

- What is conservation policy?
- National Heritage values policy
- Condition and integrity policy
- Impact on National Heritage values and surrounding development policy
- Maintenance policy
- Use policy
- Interpretation policy
- Management policy (*refer NH place guidelines for breakdown*)
- Future development policy
- Community and Stakeholder involvement policy (*if relevant*)
- Views and vistas policy
- Alienated lands policy
- Utilities policy
- State Heritage values policy

9. Management and Implementation

- Administering the Heritage Management Plan
- Review of the Heritage Management Plan
- Implementation of conservation policies
- Monitoring of potential cumulative impacts
- Monitoring and reporting of impacts to National Heritage values

Reference and Bibliography

Abbreviations and Definitions

Appendices (*as relevant*)

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8.0 Abbreviations and Definitions

Common **abbreviations** used throughout the report include:

CLMP – Community Land Management Plan

COA – City of Adelaide (Local Gov)

DEW – Department of Environment and Water (SA Gov) (*from March 2018*)

DEWNR – Department of Environment, Water and Natural Resources (SA Gov)

DPTI – Department of Planning, Transport and Infrastructure (SA Gov)

Heritage South Australia – current name of State Heritage Unit in DEW (SA Gov)

SAHC – South Australian Heritage Council

SCAP – State Commission Assessment Panel (established August 2017 under the PDI Act, assumed functions and powers of the Development Assessment Commission).

The following **definitions** have been adapted or taken directly from various guidelines, such as the *Burra Charter* (2013) or *Design in Context* (2005), or directly from legislation (i.e. *Heritage Places Act 1993*).

Amenity	The ‘liveability’ of a place that makes it pleasant and agreeable to be in for individuals and the community. Access to facilities and services impacts on a place’s amenity. A building’s amenity is affected by its features, access to sunlight, views and general design.
Archaeological Artefact	<i>Heritage Places Act 1993</i> s.3(1): means any matter forming part of an archaeological deposit, or any artefact, remains or material evidence associated with an archaeological deposit, that relates to the non-Aboriginal settlement of South Australia, or to an activity undertaken by a person as part of the exploration of South Australia, but does not include the remains of a ship or an article associated with a ship.
Archaeological Assessment	A study undertaken to establish the archaeological significance (research potential) of a particular site and to identify appropriate management actions.
Archaeological Potential	The degree of physical evidence present on an archaeological site, usually assessed on the basis of physical evaluation and historical research.
Archaeology	The study of past human cultures, behaviours and activities through the recording and excavation of archaeological sites and the analysis of physical evidence.
Associations	The connections that exist between people and a place.
Character	Character is defined by the combination of the particular characteristics or qualities of a place.

Compatible use	Means a use which respects the cultural significance of a place. Such a use involves no, or minimal, impact on heritage significance.
Conservation	All the processes of looking after an item so as to retain its cultural significance. This may include maintenance and may, according to circumstances, include preservation, restoration, reconstruction and adaptation, and will be commonly a combination of more than one of these.
Context	The specific character, quality, physical, historical and social characteristics of a building's setting. Depending on the nature of the proposal, the context could be as small as a suburban street or as large as a whole suburb or town.
Curtilage	The area of land surrounding a place of heritage significance that is essential for retaining and interpreting its heritage significance (i.e. its listed boundary). The curtilage does not always align with land title boundaries.
Development	The <i>Development Act 1993</i> defines development as: s.4 <i>development</i> means— (e) in relation to a State heritage place—the demolition, removal, conversion, alteration or painting of, or addition to, the place, or any other work that could materially affect the heritage value of the place
Development Approval	The <i>Development Act 1993</i> defines development approval as: 32—Development must be approved under this Act Subject to this Act, no development may be undertaken unless the development is an approved development.
Development Consent	A Development Approval could be made up of one or more of six consents. In this regard, the required number of consents depends on the nature and kind of development proposal. When all necessary consents have been issued, the relevant authority can issue a development approval to the applicant. Section 33 of the Development Act describes the types of consent that may need to be obtained for development approval.
Fabric	All the physical material of the place including elements, fixtures, contents and objects.
Form	The form of a building is its overall shape and volume and the arrangement of its parts.

Heritage significance	<p>The <i>Heritage Places Act 1993</i> defines significance as:</p> <p>s.16 Heritage Significance</p> <p>(1) A place is of heritage significance if it satisfies one or more of the following criteria:</p> <ul style="list-style-type: none"> (a) it demonstrates important aspects of the evolution or pattern of the State's history; or (b) it has rare, uncommon or endangered qualities that are of cultural significance; or (c) it may yield information that will contribute to an understanding of the State's history, including its natural history; or (d) it is an outstanding representative of a particular class of places of cultural significance; or (e) it demonstrates a high degree of creative, aesthetic or technical accomplishment or is an outstanding representative of particular construction techniques or design characteristics; or (f) it has strong cultural or spiritual associations for the community or a group within it; or (g) it has a special association with the life or work of a person or organisation or an event of historical importance. <p>(2) An object is of heritage significance if—</p> <ul style="list-style-type: none"> (a) it is an archaeological artefact, or any other form of artefact that satisfies 1 or more of the criteria set out in subsection (1); or (b) it is a geological, palaeontological or speleological specimen that satisfies 1 or more of the criteria set out in subsection (1); or (c) it is an object that is intrinsically related to the heritage significance of a State Heritage Place or a State Heritage Area.
Heritage value	Often used interchangeably with the term heritage significance.
Integrity	A heritage place is said to have integrity if its assessment and statement of significance is supported by sound research and analysis, and its fabric and curtilage are still largely intact. Loss of integrity or condition of fabric may diminish significance.
Interpretation	Explains the heritage significance of a place to the users and the community. The need to interpret heritage significance is likely to drive the design of new components and/or the layout or planning of the place.

Interpretation Plan	Interpretation plan is a document that provides the policies, strategies and detailed advice for interpreting a heritage place. It is based on research and analysis and plans to communicate the significance of the place, both during a conservation project and in the ongoing life of the place. The plan identifies key themes, storylines and audiences and provides recommendations about interpretation media. It includes practical and specific advice about how to implement the plan.
Maintenance	The continuous protective care of a place and its setting. Maintenance is to be distinguished from repair, which involves restoration or reconstruction.
Preservation	Maintaining a place in its existing state and retarding deterioration.
Rare	A place may be rare if it is the only example of its type. A place may always have been rare or may become rare through subsequent loss or destruction.
Reconstruction	Returning a place to a known earlier state and is distinguished from restoration by the introduction of new material.
Restoration	Returning a place to a known earlier state by removing accretions or by reassembling existing components without the introduction of new material.
Setback	The horizontal distance from the building to a prescribed boundary (such as a site boundary) or other relevant marker (such as the alignment of houses in a street).
Setting	The immediate and extended environment of a place that is part of or contributes to its heritage significance and distinctive character. It may include views to and from the heritage place. The curtilage does not always include the whole of its setting.
State Heritage Place	The <i>Heritage Places Act 1993</i> defines: s.3(1) State Heritage Place means— (a) a place entered, either as a provisional or confirmed entry, in the Register under Part 4; or (b) a place within an area established as a State Heritage Area; or (c) a place taken to be entered in the Register under Schedule 1 (as enacted on the commencement of this Act)
Use	The functions of a place, including the activities and traditional and customary practices that may occur at the place or are dependent on the place.
Views and Vistas	May form part of the significance of a heritage place. Significant views and vistas may be from and to outside the curtilage of the heritage place.

Appendix A – Location and Boundary of National Heritage Listing

The location and boundary of the National Heritage listing for 'The Adelaide Park Lands and City Layout' is provided below from the gazetted listing.⁵²

Location and Boundary

State: South Australia

Local Government: Adelaide City

Name: The Adelaide Park Lands and City Layout

Location / Boundary: About 900ha in Adelaide and North Adelaide, defined as follows:

1. an area with an outer boundary defined by the boundary of the City of Adelaide local government area.
2. Within 1. above, the following areas are excluded. Areas 1. and 2. have boundaries that are defined by the road reserve boundaries of the named streets, such that each road reserve is included in the place:

Area 1: North Terrace, East Terrace, South Terrace and West Terrace

Area 2: Three smaller grid areas located in North Adelaide bounded by the following streets: Barton Terrace West, O'Connell Street, Barton Terrace East, Lefevre Terrace, Kingston Terrace, Kingston Terrace East, Mann Terrace, MacKinnon Parade, Brougham Place, Sir Edwin Smith Avenue (originally named Roberts Place), Pennington Terrace, Montefiore Hill, Strangways Terrace, Mills Terrace.

Area 3: Railway land owned by Rail Track Corp Ltd, Australian National Railways or SA Minister for Transport comprising the following Lots: (D34345 A5, D15497 A29, D30327 A53, F22072 A23, A24 and A25, D46426 Q5, F14185 A22, F14184 A19, A20, D56872, A58 and A59, F1485, A16 and A17, D58245 A20, F11089 A23, and portion of closed road marked X3 on GRO127/2006).

Area 4: University of Adelaide North Terrace campus comprising the following Lots: Lots H105100 S1205, S1206, S1207, S737, S694, S693, S695, S592, D51367 A11.

Area 5: University of South Australia City East Campus comprising Lot D28393 A1 and Lot H105100 S593.

Area 6: Royal Adelaide Hospital precinct comprising Lots D51367 A12, A13 and A14; H105100 S614 and S762.

Area 7: State Library (H105100 S510), Museum (H105100 S561), Art Gallery of South Australia (H105100 S562) and Lots H105100 S610 and S745.

⁵² Commonwealth of Australia 2008a

Area 8: Government House and grounds (H105100 S755 and S757), Old and New Parliament Houses and grounds (H105100 S747 and S748).

Area 9: The Festival Theatre, Adelaide Casino, Convention Centre and Adelaide Railway Station Area comprising the following Lots: D46426 Q3, D46426 A9, D59055 A100, D59055 Q101 and Q102, D46426 Q1, D46426 Q2 and Q6, D38136 A104.

Area 10: Lots H105100 S1015, S549, S1203, S1204, that part of S6027 between D46426 Q5 and North Terrace/Port Road, Port Road railway bridge; that part of Montefiore Road and road reserve extending from its intersection with North Terrace in the south and its intersection with the northern loop of Festival Drive in the north, and Lot H105100 (Tramway).

3. Notwithstanding the areas excluded in 2. above, the following areas are included in the place:

(a) six squares and three gardens being: In North Adelaide - Wellington Square, Palmer Gardens and Brougham Gardens and in Adelaide - Victoria Square, Hindmarsh Square, Hurtle Square, Whitmore Square, Light Square and East Terrace Gardens (comprising F217542 A50 and F39233 Q1), and

(b) the grid of major roads (including the whole of each road reserve) consisting of the City centre grid defined by four major roads: East Terrace, North Terrace, West Terrace and South Terrace; the following streets traversing the City east-west: Hindley, Currie, Waymouth, Franklin, Grote, Gouger, Wright, Sturt, Gilbert, Rundle (Street and Mall), Grenfell, Pirie, Flinders, Wakefield, Angas, Carrington, Halifax and Gilles, the following streets running north-south: Morphett, King William, Pulteney and Hutt; and

(c) three smaller grids in North Adelaide including the following major streets (including the whole of each road reserve): Barton Terrace East, Barton Terrace West, Mills Terrace, Strangways Terrace, Montefiore Hill, Lefevre Terrace, Hill, Jeffcott, O'Connell, Childers, Buxton, Gover, Molesworth, Tynte, Barnard, Archer, Ward, Brougham Place, Palmer Place, Kermode, Pennington Terrace, King William Road, Sir Edwin Smith Avenue, Kingston Terrace, Kingston Terrace East, Mann Terrace, MacKinnon Parade, Jerningham, Stanley, Melbourne and Finnis.

Appendix B – Summary of National Heritage Listing

The summary information to the National Heritage listing for 'The Adelaide Park Lands and City Layout' is provided below from the Department of Environment and Energy's website.⁵³

National Heritage Places - Adelaide Park Lands and City Layout

The Adelaide Park Lands and City Layout is widely regarded as a masterwork of urban design and signifies a turning point in the settlement of Australia. Adelaide was the first city in Australia to be planned and developed, not as a penal settlement or military outpost, but as a place for free settlers.

Free settlement

The colony of South Australia was founded in 1836, after the colonies of New South Wales, Western Australia and Tasmania had been established. Unlike the other colonies, South Australia was not established as penal settlement, but rather as a commercial venture. Instead of granting free land to settlers, land was sold, and the proceeds used to fund the immigration of free settlers to the colony.

Surveyor Colonel William Light planned and founded the new capital city (named by royal request after Queen Adelaide) in only eight weeks. His vision, outlined in the 1837 Adelaide Plan, was for a metropolitan city surrounded by more than 900 hectares of park lands, wide streets, gardens, grid pattern of major and minor roads, several town squares, and the flowing Torrens River separating two major city areas. These lasting elements of his 1837 plan are still in existence today.

A city in a park

Adelaide is the only Australian city to be completely enclosed by park lands and has the most extensive and intact 19th century park lands in Australia. Adelaide Park Lands also has strong links to the Adelaide community as a place for many leisure activities and civic events. There is evidence that the first game of Australian Rules football in South Australia was played in the northern Park Lands in April 1860. Community groups have campaigned for the protection of the park lands as far back as 1869.

Inspirational design

The Adelaide Park Lands and City Layout is regarded throughout Australia and the world as a masterwork of urban design and the model has been used widely by other towns in Australia and overseas. It is recognised by town planners and historians as a major influence on the Garden City planning movement, one of the most important western urban planning initiatives in history. The picturesque Adelaide Park Lands is important to the identity of

⁵³ Department of Environment and Energy 2018a

South Australia. It is a hallmark of the city's original design, which has maintained elements of its historical layout for more than 170 years.

Location

Adelaide Park Lands and City Layout site includes 900 hectares in total and is defined by the 1837 layout of streets including parks in the city centre and significant areas such as Victoria Square, Hindmarsh Square, the Botanic Gardens, Palmer Gardens and Brougham Gardens in North Adelaide.

Privately owned land between the road reserves in the city layout, the railway reserves and State Government lands and institutions have not been included in the National Heritage Area.

Further information

Location and Boundary map (PDF - 947.16 KB) ([weblink](#))

Gazettal notice (PDF - 818.46 KB) ([weblink](#))

Australian Heritage Database record ([weblink](#) – see *Department of Environment and Energy 2018b*)

Adelaide City Council ([unlinked](#))

Appendix C – Background Information to National Heritage Listing

The background information to the National Heritage listing from the Australian Heritage Database record is provided below, excluding the location (refer Appendix A) and heritage values under each criterion (Section 2.2).⁵⁴

Australian Heritage Database

Place Details: The Adelaide Park Lands and City Layout, South Tce, Adelaide, SA, Australia

List: National Heritage List

Class: Historic

Legal Status: Listed place (7/11/2008)

Place ID: 105758

Place File No.: 105758

Summary Statement of Significance:

The Adelaide Park Lands and City Layout is a significant example of early colonial planning which has retained key elements of its historical layout for over one hundred and seventy years.

The 1837 Adelaide Plan attributed to Colonel William Light and the establishment of Adelaide marks a significant turning point in the settlement of Australia. Prior to this, settlement had been in the form of penal colonies or military outposts where the chief labour supply was convicts.

The Colony of South Australia was conceived as a commercial enterprise based on Edward Gibbon Wakefield's theory of systematic colonisation. It was to be established by free settlers who would make a society that would be 'respectable' and 'self-supporting'.

The Adelaide Plan was the basis for attracting free settlers, offering certainty of land tenure and a high degree of amenity. Being formally laid out prior to settlement, with a grid pattern and wide streets and town squares, the Plan reflected new town planning conventions and contemporary ideas about the provision of common or reserved land for its aesthetic qualities, public health and recreation.

The Plan endures today in the form of the Adelaide Park Lands and City Layout. The key elements of the Plan remain substantially intact, including the layout of the two major city areas, separated by the meandering Torrens River, the encircling Park Lands, the six town squares, the gardens and the grid pattern of major and minor roads.

⁵⁴ Department of Environment and Energy 2018b

The Park Lands, in particular, are significant for the longevity of protection and conservation and have high social value to South Australians who regard them as fundamental to the character and ambience of the city of Adelaide.

The national significance of the Adelaide Park Lands and City Layout lies in its design excellence. The Adelaide Plan is regarded as a masterwork of urban design, a grand example of colonial urban planning. The city grid and defining park lands were laid over the shallow river valley with its gentle undulations, described by Light as the Adelaide Plains. The city layout is designed to take full advantage of the topography, an important innovation for the time. The streets were sited and planned to maximise views and vistas through the city and Park Lands and from some locations to the Adelaide Hills. A hierarchy of road widths with a wide dimension to principal routes and terraces and alternating narrow and wide streets in the east-west direction were featured on the historic plan. Features within the Park Lands area included a hospital, Government House, a school, barracks, a store house, a market and a botanic garden and roads.

The tree planting designed and implemented since the 1850s and the living plant collection of the Park Lands, particularly within the Adelaide Botanic Gardens are outstanding features. The encircling Park Lands provide for health and recreation for the inhabitants while setting the city limits and preventing speculative land sales on the perimeter.

The emphasis on public health, amenity and aesthetic qualities through civic design and provision of public spaces were to have an influence on the Garden City Movement, one of the most significant urban planning initiatives of the twentieth century. Ebenezer Howard, the founder of the Garden City Movement cites the Adelaide Plan as an exemplar in his *Garden Cities of Tomorrow*.

Even before this influence, however, the Adelaide Plan was used as a model for the founding of many towns in Australia and New Zealand. It is regarded by historians and town planners as a major achievement in nineteenth century town planning.

The Adelaide Park Lands and City Layout is also significant for its association with Colonel William Light who is credited with the Adelaide Plan and its physical expression in the form of the Adelaide Park Lands and City Layout.

Description:

The City of Adelaide is divided into two distinct sectors that straddle the River Torrens, the City centre to the south, and suburban North Adelaide. The City has a hierarchical grid street pattern, contains six town squares and is entirely surrounded by Park Lands. The city of Adelaide was originally laid out as 1042 town acres and in some instances the original boundaries are still evident. South Adelaide, the city centre comprises 700 acres while the North Adelaide residential area covers the remaining 342 acres. Six squares were laid out within the City of Adelaide.

The city streets are organised into four blocks, with the City centre encompassing one large block, and North Adelaide three smaller blocks. The siting of the blocks reflects the topography of the area, with the main block situated on generally flat ground and the other three blocks, each at an angle

with the others, on higher land in North Adelaide. The main block, the City centre, is defined by four major roads: East Terrace, North Terrace, West Terrace and South Terrace. In total, eleven original streets traverse the City east-west and six original streets traverse it north-south. Nine streets which traverse the City east-west culminate in the centre at King William Street which also defines name changes for the streets running east-west. The streets are primarily named after key historical figures: Rundle, Grenfell, Pine, Flinders, Wakefield, Angas, Carrington, Halifax, Gilles, Gilbert, Start, Wright, Gouger, Grote, Franklin, Waymouth, Currie and Hindley Streets. The central streets in this grid, Wakefield and Grote Streets are marginally wider than the others, to illustrate their greater importance. The City also contains numerous minor streets that were constructed within a few years of survey, but were not part of the original plan.

North Adelaide comprises three smaller grids in which the majority of original streets run east-west. The major grid of North Adelaide is defined by Barton Terrace, Lefevre Terrace, Ward Street and Hill Street, with O'Connell Street as the major thoroughfare and Wellington Square in the centre.

The streets in both the City centre and North Adelaide are broken up intermittently by six town squares before they culminate at the Park Lands. Five squares, Victoria, Hurtle, Whitmore, Hindmarsh and Light Squares are located within South Adelaide, while Wellington Square is in North Adelaide. Some squares have been altered with the road ways around and through some of the squares changed, both from an urban design perspective and to address traffic management issues. The substantial design of each Square, except Victoria Square, remains intact. These changes reflect changing aesthetic tastes and requirements in the twentieth century.

Each square retains a distinct character, with different development on the edges. The form of Victoria Square remains, but its design, driven primarily by traffic changes, has changed markedly. It is no longer a focus for the City for pedestrians. It has retained a primarily public function with and office development around its perimeter. Hurtle and Whitmore Squares are more residential, while Hindmarsh and Light Squares accommodate more commercial uses. Wellington Square, the only square in North Adelaide, is surrounded by primarily single storey development, but of a village character, which includes a former shop, former Church and public house.

The squares contribute to the public use of the City, providing open green spaces for residents, workers and visitors who value them highly.

The Park Lands comprise over 700 hectares providing a continuous belt which encircle the City and North Adelaide. The Park Lands vary in character from cultural landscapes, to recreational landscapes, and natural landscapes. Some areas are laid out as formal gardens, other areas have a rural character and others are used primarily for sporting uses.

The Park Lands act as a buffer to the City Centre, and also provide both passive and active recreational uses to the community. They are the setting for numerous public functions, and serve an aesthetic function in defining the city. The Park Lands are visible from many parts of the City and North Adelaide and form end points for vistas through the City streets. They contribute to views out of the City, together with the distant views of the Adelaide Hills in the background, as well as providing views into the City. The

visual character of the Park varies with its many uses - formal gardens and lawns, informal parks of turf and trees, a variety of sports fields, with associated buildings and facilities. The Adelaide Park lands have been valued by many South Australians over time for their aesthetic qualities, and as a place for recreation and other community activities.

The Park Lands are described as a single feature, yet they vary in character greatly from area to area. Some areas are laid out as formal gardens, others have a rural character and others are used primarily for sporting uses. The Park Lands also accommodate many other, mostly public, uses in areas identified as reserves by Light, such as the West Terrace Cemetery and the Governor's Domain, as well as in other areas alienated from the original Park Lands as defined by Light, such as the civic uses of North Terrace and Victoria Park Racecourse. Many cultural institutions occupying the Park Lands: the Botanic Gardens, Zoo, the State Library, Migration Museum, the Art Gallery, the SA Museum, Government House, Parliament House, the Festival Theatre and Playhouse, the Convention Centre, the Parade Ground, the hospital, Adelaide University and Adelaide High School. Other reserves include the Torrens linear park, Government Walk, the Parade Ground, the Pioneer Women's Gardens, the Adelaide Oval and two public golf courses.

Today there is little physical archaeological evidence remaining in the Adelaide Parklands of Aboriginal occupation and of the pre-colonial landscape.

The South Australian Old and New Parliament Houses is entered into the National Heritage List (Data Base No. 105710). The Adelaide Park Lands and the City of Adelaide Historic Layout and Park Lands are listed in the Register of the National Estate (RNE) (Register Nos: 6442 and 102551). The following places are individually listed within the RNE: the Zoological Gardens (Register Nos: 8593 and 18585), the Botanic Gardens (Register No. 6433), the Elder Park Bandstand (Register No. 6351), the Women's War Memorial Gardens (Register No. 14568), the Adelaide Oval and Surrounds (Register No. 19236), Victoria Park Racecourse (Register No. 18546), Art Gallery of South Australia (Register No. 6396), Barr Smith Library (within the University grounds) (Register No. 6365), Bonython Hall (within the University grounds) (Register No. 6368), Brookman Hall (Register No. 6382), Catholic Chapel, West Terrace Cemetery (Register No. 6357), Cross of Sacrifice/Stone of Remembrance (Register No. 14568), Elder Hall (Register No. 6367), Government House and Grounds (Register No. 6328), Union Building Group, Margaret Graham Nurses Home, Adelaide Oval Scoreboard, Yarrabee, River Torrens (outside Adelaide City), Institute Building (former), Bank of Adelaide (former), Tropical House, Main Gates, Botanic Gardens, Watch House, Catholic Chapel, Chapel to Former Destitute Asylum, Mitchell Building, Albert Bridge (road bridge), Schoolroom to Former Mounted Police Barracks, Historical Museum, Mortlock Library, South Australian Museum, Art Gallery of South Australia, Old Parliament House, Old Mounted Police Barracks, Adelaide Gaol (former), Powder Magazine (former) and Surrounding Walls, North Adelaide Conservation Area, Victoria Square Conservation Area, River Torrens (within Adelaide City), Mitchell Gates and Fencing, Adelaide Railway Station, Administration Building and Bays 1 - 6 Running Shed, South African War Memorial, Royal Adelaide Hospital Historic Buildings Group, North Adelaide Railway Station, Old Grandstand, Hartley Building, Torrens Training Depot, University Foot Bridge, Adelaide Bridge, Torrens Lake Weir and Footbridge,

Rose Garden Fountain and Botanic Garden Toolshed.

Over 70 places in the Adelaide Park Lands are entered in the South Australian Heritage Register. Most notably these include the institutions along North Terrace, including the Adelaide Railway Station, Old and New Parliament Houses, and buildings belonging to the State Library and South Australian Museum, Art Gallery of South Australia, University of Adelaide and Royal Adelaide Hospital (SA Heritage Branch, 2005).

History:

Background

At the time of settlement, the Adelaide Plains were occupied by Kaurna people, whose descendants continue to maintain connections with their traditional lands. It is unclear as to how long the Kaurna people have occupied the area, however it would be thousands of years as sites on Kangaroo Island have been dated to the Pleistocene at 21,000 years (Jones 2007:32). The River Torrens or Karrawirra Parri was an important resource for Aboriginal people that provided the most reliable water source in the area and abundant marine and bird life. It is believed that occupation patterns across the area would have been between the estuary and the hills (Jones 2007:32).

The colony of South Australia was founded in 1836, after the colonies of New South Wales, Western Australia and Tasmania had been established. Unlike the other colonies, South Australia was not established as penal settlement, but rather as a commercial venture. Established fifty years after the colony of New South Wales, the colonisation of South Australia was carefully considered by the British government.

Edward Gibbon Wakefield was concerned about the instability that land speculation and social problems had caused in these earlier settlements, and sought to find the right conditions for the success of new colonies. Wakefield developed his theory of systematic colonisation, believing that careful planning would provide a balance between land, capital and labour and thus the conditions for economic and social stability. He promoted the establishment of South Australia as a model colony that would be settled on this basis.

In 1834, Wakefield's ideas were partially realised when legislation was passed that provided for the establishment of South Australia. The colony would be overseen by the British Government through the Colonial Office, but with land, emigration, labour and population matters managed by a Board of Colonisation Commissioners. The South Australian Company was established in 1835 to expedite the sale of land in the colony, and much of the colony of South Australia had been planned, advertised and sold before the colony was settled.

The Board of Colonisation Commissioners was formed in May 1835. GS Kingston (1807-1880), civil engineer, architect and later politician, was employed as Deputy Surveyor. The Commissioners appointed Colonel William Light (1786-1839) as Surveyor-General early in 1836. He had experience in 'infantry, cavalry, navy, surveying, sketching and [an] interest in cities' and had initially been recommended for the position of Governor of South Australia. BT Finniss (1807-1893) and H Nixon were also employed with Kingston as

surveying staff, and they arrived in South Australia in August 1836.

The Commissioners gave Light sole responsibility for choosing the site of the colony's first town and clear instructions about its planning:

'When you have determined the site of the first town you will proceed to lay it out in accordance with the Regulations...' and 'you will make the streets of ample width, and arrange them with reference to the convenience of the inhabitants, and the beauty and salubrity of the town; and you will make the necessary reserves for squares, public walks and quays' (Johnson 2004:12-13).

The Commissioners also directed Light to 'look to any new town precedent in America and Canada' for guidance. The grid plan was by then an established planning convention for colonial new towns in the English-speaking world. It probably had its origins in Roman military camps, and was first used by the English for fortified towns or bastides during the twelfth and thirteenth centuries, the grid pattern making it easy to collect property taxes. The grid plan was later evident in the plans developed for colonial new towns. Many of the new towns established in Upper Canada and in the southern colonies of North America in the eighteenth century had gridded plans and one or more town squares. William Penn's Philadelphia (1687) was followed by Charleston (1672). In Savannah (1733), and a number of other towns in Georgia, a belt of encircling parkland was also provided. Savannah was laid out by social reformer Oglethorpe who influenced Granville Sharp, a British anti-slavery campaigner and utopian who attempted to establish model towns for freed slaves in which he promoted the benefits of the grid and greenbelt (The Adelaide Review 2004:2).

In around 1789, the Governor-General of Canada, Lord Dorchester, developed a model town plan for use by surveyors in Upper Canada, probably with the assistance of Captain Gother Mann, a commander of the Royal Engineers in Upper Canada. The model for inland sites was one-mile square, with regularly spaced roads and one-acre lots. It was encircled by a belt of reserved land that provided a barrier between the township and surrounding farm lots.

In 1788, Mann prepared a plan for Toronto, in which the town would be one mile square, with a grid system of streets, five symmetrically positioned squares and a sixth square that opened to the waterfront. As with Dorchester's model, it was provided with a belt of reserved land. This plan, which was not actually used for Toronto, has been described as 'a blueprint for successive new towns in Canada, Australia and New Zealand'.

In the 1790s, the newly appointed Lieutenant-Governor of Upper Canada, Colonel John Graves Simcoe, promoted the use of Dorchester's and Mann's town designs, including the 'park belt' idea, as a model for the surveying of Upper Canada. It has been argued that the use of common or reserved land for 'enclosure and separation' became an established planning convention during this period.

A number of model plans for new towns were also developed in the late eighteenth and early nineteenth centuries with provision for a belt of park lands around the town. In 1794, a model plan was developed by the English social reformer Granville Sharp, outlined in A General Plan for Laying Out Townships on the New Acquired Lands in the East Indies, America, or

Elsewhere. It had a grid road pattern, a central square and a strip of common land that surrounded the town lots.

In 1830, retired English naval officer Allen Gardiner published *Friend of Australia* under the name of TJ Maslen, outlining his idea of a model town for the Australian colonies. He suggested that 'a park [should] surround every town, like a belt one mile in width' and that 'all entrances to every town should be through a park, that is to say a belt of park of about a mile or two in diameter, should entirely surround every town, save and excepting such sides as are washed by a river or lake'. He included the park lands for health, recreation and aesthetic reasons.

In 1833 the House of Commons Select Committee considered 'the best means of securing Open Spaces in the vicinity of Populous Towns, as Public Walks and Places of exercise' ...to study 'the relationship between general health in densely populated towns and the psychological and recreational value of public open spaces' (Johnson 2004). The report found that there was a need for more open spaces in cities, and that 'during the last half century many enclosures of open spaces in the vicinity of towns have taken place and little or no provision has been made for public walks or open spaces, fitted to afford means of exercise of amusement to the middle and humbler classes'. Reformers like John Arthur Roebuck campaigned against the enclosure of traditional commons and argued that towns should be provided with parks and gardens for 'health and recreational purposes'.

The Board of Colonisation Commissioners were possibly influenced by the social utopian and utilitarian ideas of Robert Owen and Jeremy Bentham. Wakefield and Bentham had collaborated in developing ideas for the colonisation of South Australia, and Bentham advocated a 'principle of spatial containment and concentration with social and economic control'. Around ten years before the settlement of South Australia, Owen wrote about his ideas for self-supporting cooperative communities or 'villages of unity and mutual cooperation'. The idea was essentially for a 'town in a building set in open space' and was similar to Bentham's 'industry-house establishment'. In both instances, spatial elements would shape and control the social relations within the town.

The Adelaide Park Lands may have been provided as a form of enclosure that would concentrate the population in the City and control the supply and value of land, ideas that could have been derived from the work of Wakefield and Bentham. It has also been argued that South Australia's planners sought to control social relations by utilising a town layout that maximised the visibility of the population and encouraged people to form small social groups within well-defined areas. Possibly it was used as a form of concentric zoning that was intended to shape economic and social relationships. Providing democratic access to public lands for health and recreation were other reasons. It has also been suggested that the park belt was intended to provide protection from a perceived threat of attack by Aborigines.

Social and economic context

The study by City Futures Research Centre (2007 Vol 2:183) notes that the design of Adelaide was a crucial part of British planning for the new colony of South Australia as a self-supporting land settlement, and the city's plan forms the most enduring and tangible evidence of that colonial experiment. South

Australia was the last of the colonies to be settled and was intended as a free settlement. British intentions for establishing South Australia were different to those for New South Wales and Western Australia.

The colony was founded by British legislation in 1834. Control of all the land was delegated to a Board of Colonization Commissioners with proceeds from the sale of land to be put towards an Emigration Fund. This new approach to planting a colony applied the Wakefield principles of systematic colonisation, concerning land, labour and capital. Instead of granting free land to settlers, land was to be sold, and the proceeds used to fund the emigration of free settlers (labourers) to the colony. The scheme involved advanced planning, and controlled land survey before settlement. The new city (named by royal request after Queen Adelaide) was planned as 'bait' to attract capitalist investors by purchase of cheap city sections, while the generous layout also reflected the aspirations of British reformers, and their hopes of developing a new, more civilized, social order in Australia (City Futures 2007 Vol 2:183).

In 1836, the Commissioners appointed Colonel William Light as Surveyor General, and instructed him to select the site and plan the new capital. Light's plan of 1837 included nine 'Government Reserves', and indicated the likely future routes of roads through an encircling belt of park lands to the port and country lands. Other areas of the park lands have also since been alienated for uses including new street alignments, railways and public and recreational buildings, but most of these functions have played significant roles in the historical development of South Australia, and in terms of the Adelaide Plan, they have maintained, or increased, the intended public use of the park lands and squares (City Futures 2007 Vol 2:183).

Planning history

The Garden City Movement had a profound effect on town planning in the early twentieth century. Social reformer Ebenezer Howard had referred to the Adelaide Park Lands in his influential book *Garden Cities of Tomorrow* (1902). Mumford believed that Howard had introduced the Greek concept of colonisation by fully equipped communities, in line with the views of social reformers like Robert Owen and Edward Wakefield (Mumford 1961:586). The London based Garden City Association advanced Howard's ideas as a model for city planning and organisation. The City Beautiful movement promoted the creation of new parks, boulevards and street beautification by linking aesthetics with growth. The Garden City movement endorsed garden suburbs with generous open spaces amongst other characteristics. Influenced by Howard, the ideology of civic beautification started to develop at the start of the twentieth century in Australia (Sulman 1919).

Reflecting the significance of the Adelaide Plan, there has been intense debate both about the plan's origins, and its planners. The principal role of South Australia's first Surveyor General, Colonel William Light, has been affirmed, with acknowledgement of major contributions by George Strickland Kingston. Light, as instructed, looked at other examples of the planting of towns of this kind for ideas about its layout, and several sources can be identified. The South Australian Colonization Commission in London appointed Kingston Assistant Surveyor in 1835, and he supervised preparation of a preliminary 'Plan of Town' by other surveying staff, Boyle Travers Finniss and Edward O'Brien. This notional plan was used to raise funds for the new colony through 'preliminary purchases' of town acres (City

Futures 2007 Vol 2: 183-184).

Light was appointed Surveyor General in 1836, and departed in that year with a group of surveyors, including Kingston and Finniss. They were sent ahead of the first settlers to locate and lay out the new capital and survey the surrounding country lands in advance of other development. Light was given clear responsibility for selecting the site, but little was said in his instructions about the plan except that it was to be spacious, with wide streets, squares and public reserves, and in accordance with 'Regulations for the preliminary sales of colonial lands in the country'. These included the requirement of creating a town of 1,000 one-acre lots (the final total, including the squares and places, was 1,042), and these Town Acres are still recognized by the city's planners (City Futures 2007 Vol 2:184).

The choice of site was critical, and was done only after careful reconnaissance. Light's selection of the site of the capital city and seat of government was decided in December 1836, and the city was laid out in January-March 1837 with opportunism informing the placement of the layout on the landscape. Light reserved encircling 'Park Lands' on his Map of 'The Port And Town of Adelaide' (1837) which also delineated nine Government Reserves on the park lands. Two of these, the Government Domain (including the present site of Government House), and the (West Terrace) Cemetery were used as designated, and remain in those locations today, forming significant elements of the surviving Adelaide Plan. Another Government Reserve was indicated for a Botanic Gardens. Although these were established elsewhere in the park lands, they represent another feature of the original Adelaide Plan, as well as a significant designed element in their own right, dating from the preparation of the first botanic gardens plan (1850s) for Australia (City Futures 2007 Vol 2:184).

With a grid street pattern, systemic provision of town squares, and defining parkland, the 1837 city plan of Adelaide combined numerous physical planning ideas and innovations of the colonial era. Many influences have been identified, from ancient Roman camps to ideal city plans such as William Penn's Philadelphia and James Oglethorpe's Savannah, as well as more abstract models including Granville Sharp's ideal township of 1794 and T.J. Maslen's ideal town in his *The Friend of Australia* (1830). Most of the Adelaide Plan's elements were not novel but their arrangement on the ground was an inspired response to site and opportunity, and represented the culmination of the whole colonial planning movement of the time (City Futures 2007 Vol 2:184).

The Adelaide plan, with its three layers of town land, parkland and suburban land, was later used as a model for many of the towns surveyed in South Australia, such as Gawler, Mylor and Alawoona, and the Northern Territory, particularly between 1864 and 1919. The government had a substantial role in creating and planning South Australia's towns, unlike the other Australian colonies where speculative development led to more varied results. South Australia's surveyors provided some parkland in around half of the towns established prior to 1864, probably in imitation of the Adelaide plan. In 1864, Surveyor-General G W Goyder provided instructions to his staff that all new towns should have encircling park lands, and that town land should be laid out in the form of a square, with the roads at right angles to each other, and with five public squares. The parkland town remained popular until 1919, when

South Australia's newly appointed town planner, Charles Reade, recommended that it no longer be used.

The study by City Futures (2007 Vol 1:97) notes that 'the town was surveyed in two stages. The major portion of 700 acres south of the river was laid out first. The fretted edge on the eastern side took advantage of the local topography and provided more lots with a parkland outlook. The northern section was broken into three parts to reflect the land form and address the river: a small section of 32 lots closest to the river, a larger section with a western edge serrated by steep slopes, and a third eastern section whose layout secures the required number of lots 'in a triumphant coda in the north-east where the last three lots turn west with a final flourish'. North Adelaide was destined to be predominantly residential and South Adelaide commercial. The rectangular grid plan oriented to the cardinal directions is distinguished by the encircling parklands and six town squares, five in South Adelaide. Government offices and other civic buildings were to be grouped around the largest, central square. The street layout features an alternating system of narrow and wide streets in the east-west direction, with the two principal routes and the terraces being made wider still. Few north-south streets were inserted apparently due to Light's concern with the effect of hot northerly summer winds'.

The Adelaide Plan displayed all of the key elements that made up the 'grand modell' of the era, including: a policy of deliberate urbanisation, or town planning, in preference to dispersed settlement; land rights allocated in a combination of town, suburban and country lots; the town planned and laid out in advance of settlement; wide streets laid out in geometric form, usually on an area of one square mile; public square; spacious, standard-sized rectangular plots; plots reserved for public purposes; and a physical distinction between town and country, by common land or an encircling green belt (City Futures 2007 Vol 2:184).

The Adelaide Plan has provided a robust framework for the development of the central city and has been an important influence on its attractive and scenic character. Whilst the Plan was essentially a one-off morphological design rather than a comprehensive urban plan, it was also lauded from the nineteenth century onwards within modern town planning circles. The 1893 meeting of the Australian Association for the Advancement of Science recorded universal credit to Light for his selection of the site and for the design of Adelaide. The early Australian planning movement celebrated its originality. The leading architect-planning advocate John Sulman singled out Adelaide as an exception to the usual prosaic planning of Australian towns, and A.J. Brown and H.M. Sherrard made the same assessment in their 1951 textbook for a later generation of planners (City Futures 2007 Vol2:184).

The Adelaide Plan was interconnected with the international and post-colonial planning movement when used in Ebenezer Howard's manifesto, *Garden Cities of Tomorrow* (1902) to illustrate 'the correct principle of a city's growth'. The plan also influenced the Garden City movement that developed at the turn of the century. In *Garden Cities of Tomorrow*, Ebenezer Howard cited Adelaide as an example of an existing city that conformed to the Garden City idea, 'Consider for a moment the case of a city in Australia which in some measure illustrates the principle for which I am contending. The city of Adelaide, as the accompanying sketch map shows, is surrounded by its 'Park

Lands'. The city is built up. How does it grow? It grows by leaping over the 'park-lands' and establishing North Adelaide. And this is the principle which it is intended to follow, but improve upon, in Garden City.

Based on ideas of cellular and constrained expansion, Howard's garden city movement had an international impact. The plan of Adelaide was an undoubted influence on Howard's thinking, and the connection underpins its planning heritage significance (City Futures 2007 Vol 2:184).

A number of towns in New Zealand were also based on the Adelaide plan, including Wellington, Christchurch, Dunedin, Invercargill, Wanganui, Hamilton, Alexandra, Clyde, Cromwell, Gore, Port Chalmers and New Plymouth. In Wellington, a crescent-shaped town belt was provided, and in conjunction with the harbour it encloses the city and separates it from the surrounding land. It remains substantially intact.

History of the Adelaide Park Lands

The site for the City of Adelaide was selected by Colonel William Light, South Australia's first Surveyor General, in 1836. The city was laid out as two distinct sectors on either side of the River Torrens and the whole area was surrounded by a continuous belt of parkland, now known as the Adelaide Park Lands.

The original plan for Adelaide set aside 2300 acres for the Park Lands, with provision for nine blocks to be 'received out of the Park Lands for various government building or other purposes'. These included the Government domain, Botanic Gardens, School, Store House, Guard House, Barracks, Hospital, Cemetery and Immigration Square.

In 1839 Governor George Gawler purchased the Park Lands to ensure that they remained intact 'for the inhabitants of the city'. The Park Lands came under the care, control and management of the Adelaide City Council in 1849. At that time a large area had already been claimed for governmental functions. In 1856 the South Australian Institute was created by Act of Parliament and land sought for an Institute Building. In 1860 seven sections of the area between North Terrace and the River Torrens, originally part of the Park Lands, were allocated as a government reserve for various government and institutional purposes (Adelaide: A brief History: 2-3). Since then the total area alienated for all purposes is approximately one third of the 2300 acres. These developments include the Art Gallery, Festival Centre, Museum, Botanical and Zoological Gardens, State Library, University of Adelaide, Royal Adelaide Hospital, Police Barracks, Observatory, the Railway Station and Adelaide High School. In recent times, a number of commercial developments have been permitted in the Park Lands, including the Hyatt Regency Hotel and the Adelaide Convention Centre.

During the first decades after European settlement, the Park Lands accommodated stone quarries, clay and lime pits, a mill, extensive olive plantations and rubbish dumps, all of which altered its original character and landform. In 1840, a slaughterhouse was established in Bonython Park and it remained in operation until 1910. Adelaide's first cemetery was established in the western Park Lands in 1837, and there is evidence that the first game of Australian Rules football in South Australia was played in the northern Park Lands in April 1860. The Park Lands were also used for the pasturing of

sheep, cattle and horses.

Especially in the early days of the colony, the Park Lands were under constant threat of land acquisition, and activities such as tree felling and quarrying. From some of these activities, substantial Council revenue was generated and by the 1850s the Park Lands had been denuded of trees to such an extent that a Council replanting program was commenced.

A number of formal gardens, recreational facilities and sporting grounds were established in the Parklands, including the Zoological Gardens (RNE Nos. 18593 and 18585), the Botanic Gardens (RNE No. 6433), the Elder Park Bandstand (RNE No.6351) and the Women's War Memorial Gardens (RNE No.14568). The South Australian Cricket Association began to develop the Adelaide Oval after it was established in 1871 (RNE No.19236) and the South Australian Jockey Club established Victoria Park Racecourse in 1847 (RNE No.18546).

The Adelaide Botanic Garden developed from 1855 by the inaugural director George William Francis who also established foundational tree plantings in the Park Lands. Francis was succeeded by Dr Richard Moritz Schomburgk in 1891 who provided trees from the Garden's nursery for planting in the Park Lands and squares (Jones 2007: 37-40).

William O'Brien was appointed as City Gardner in 1861, implementing the horticultural and design frameworks of the Park Lands and Squares work that was continued by William Pengilly (Jones 2007). Large-scale tree planting schemes were further encouraged by Adelaide's Lord Mayor, Sir Edwin Smith, in the 1870s to beautify the Park Lands. John Ednie Brown proposed a planting design, A Report on a System of Planting the Adelaide Park Lands (1880) that illustrate the Gardenesque planting style and as Conservator of Forests was a principal source of trees (Jones 2007, 40) Jones (2007) notes how the gardener August Pelzer implemented the Brown plan and undertook continuous landscape design improvements. The Park Lands landscape development was continued by Owen Smyth and to the mid 20th Century William Charles Douglas Veale. (Jones, 1998:36) (Jones 2007, 38-50, Volumes 2 and 3).

At this time, many eucalypts were replaced with ashes, elms, poplar and other exotics. By the late 1930s, much of the present road network was in place, and roads now define the edges of the Park Lands. After World War II the use of the Park Lands intensified considerably. During the 1950s the City Council initiated a number of projects to develop the Park Lands, including a large landscape garden (Veale Gardens) in the South Park Lands in 1958, a swimming centre in the North Park Lands in 1967, a par 3 golf course, a restaurant overlooking the River Torrens in 1960 and the Festival Theatre complex in Elder Park in 1974.

At the time of settlement, the Adelaide Plains were occupied by Kaurna people, whose descendants continue to maintain connections with their traditional lands. The natural ecosystems which made up the country prior to European settlement were swamp, woodland, mallee, grasslands and forests. In part the landscape was the result of Aboriginal occupation, which included seasonally burning of the land to reduce undergrowth and regenerate plant growth. European settlers were attracted to the Adelaide plains, according to Ellis (1976: 7) because its lightly-timbered open grassland resembled English

countryside. With the establishment of Adelaide, the park lands gained particular significance for Aboriginal people as places to gather and camp on the fringes of the city.

The River Torrens was a major corridor of economic and cultural activity for camping, gatherings and ceremonies, burials, and the movement of food and resources. The river corridor continued to be an important gathering place after European settlement. For example, Tarndanya Womma/Park 26 was where Aboriginal people met before visiting Government House for rations and blankets, and prior to enlistments for World War I.

There are two important Kaurna sites within the Park Lands including the red kangaroo dreaming, or Tarnda Kanya in Tarndanya Womma/Park 26, which is associated with the Torrens River and a former excavated rock, referred to as the red kangaroo rock which was once located at what is now the Festival centre (Jones 2007). While the other important site is a central camping place, or headquarters for the Tarndanya clan, located at Tarndanyangga/Victoria Square (Jones 2007:32).

With the establishment of Adelaide, the Park Lands gained particular significance for Kaurna people as places to gather and camp on the fringes of the city. The Park Lands continue to be significant to Kaurna and other Aboriginal people because of the pre-historic and historic association with the place. Such representative places include the camping sites where people camped prior to and since European settlement; the gathering and meeting places; the various stone artefacts uncovered in the area; and the West Terrace Cemetery where many Aboriginal people were buried since Europeans arrived.

The Aboriginal Flag designed by Harold Thomas, was first flown at Victoria Square, in Adelaide, on National Aboriginal Day on 12 July 1971. The flag later became universally recognised as a representation of Aboriginal identity, and its association with many Aboriginal activists and protests, including its long association with the Aboriginal Tent Embassy, Canberra.

The Adelaide Parklands have been valued by many South Australians over time for their aesthetic qualities, and as a place for recreation and other community activities. The community groups included the Park Lands Defence Association (1867-87) and the Parklands Preservation League formed in 1903 which was succeeded by the Adelaide Parklands Preservation Association.

The Adelaide Park Lands Act 2005 arose from political debate and friction between the State Government and City Corporation about the management, identity and role of the Park Lands. The scope of the Act includes both the Park Land blocks as well as the Squares including the North Terrace promenade (Jones 2007:62).

Condition and Integrity:

The Park Lands and the layout of the City of Adelaide remain substantially intact and still recognisable as the 1837 Plan. The original plan is evident in the boundaries of the City, the width and layout of the main streets, the belt of Park Lands, the squares and remnant town acres.

The alienation of the Park Lands from general public access has been occurring since they were laid out, primarily for public uses. Approximately one third of the original area has now been alienated for other purposes. The Adelaide City Council has the 'care, control and management' of approximately 74 percent of the originally designated Adelaide Park Lands, which is around 1700 acres, and these areas are generally well maintained (RNE No.102551: June 2001). New road routes, primarily through the Park Lands link the City and North Adelaide with the suburbs.

The City and North Adelaide were originally divided into one-acre blocks. Few entire one acre blocks remain although it is possible to discern the original boundaries of the town acres in some instances (particularly in North Adelaide where the town acres were often subdivided into four blocks). These sites tend to primarily be in the ownership of government and church, including use by schools and hospitals.

The area now known as the cultural and institutional precinct along North Terrace contains institutions such as the University of Adelaide and the Art Gallery of South Australia which form a visual barrier between the northern and southern parts of the Light Plan. These institutions have also acquired heritage significance. The Railway Station, a hotel and convention centre adjoining it were alienated from Park Lands in the western part of North Terrace.

The City contains numerous minor north-south streets constructed within a few years of survey, that were not part of the original plan. In addition, Frome Road was cut through the western part of the City in the 1960s, and runs from Angas Street to North Terrace. In other instances, streets were realigned or extended through the Park Lands to link Adelaide with the surrounding suburbs. For example, King William Street was realigned in the early twentieth century to link North Adelaide and the City, Kintore Avenue was extended from North Terrace down to the River Torrens and the alignment of Montefiore Hill which leads to Light's Vision, an outlook point at North Adelaide over the City, was changed to create a major thoroughfare from Morphett Street to Jeffcott Street. Numerous roads were built through the Park Lands to connect with the suburbs, including Glover Avenue, Burbridge Road, Goodwood Road, Sir Lewis Cohen Avenue, Peacock Road, Unley Road, Hutt Road, Wakefield Street and Rundle Road. War Memorial Drive was built as a war memorial along the River Torrens. Medindie Road, Lefevre Road, Main North Road, Prospect Road and Jeffcott Street were all extended from North Adelaide through the Park Lands to link with the suburbs.

Of the six squares, the changes to Victoria Square, the central and largest Square, are the most noticeable. Victoria Square was planned to be a focal point for the City but it has become surrounded by office development around its perimeter. The Square has been encroached upon by King William Street, which has had an impact on views through the square. Hindmarsh, Light and Hurtle Square have also been subdivided by roads. Whitmore Square and Wellington Square are the most intact of the squares.

Appendix D – Landscape Character Map Categories Breakdown

The following tables provide a breakdown of each area of landscape character categories, which was mapped in Section 4.1, and sources were the aspects were identified from.

Built structures
buildings
pavilions
rotundas
grandstands
Adelaide Oval scoreboard
Adelaide High School
Adelaide Aquatic Centre
Sources: CLMPs and Google maps 2018

Car parking
Source: COA 2017 'Parking in the Park Lands' map; permanent only

Roads
Source: Google maps 2018

Utilities
COA Nursery (Park 10)
North Adelaide Reservoir (Park 4)
ETSA facilities (Park 4)
Source: CLMPs and Google maps 2018

Formal landscape
Adelaide Botanic Garden
Veale Garden
Osmond Gardens
Himeji Garden
Rymill Rose
Kingston Gardens
Pennington Gardens
Creswell Gardens
Angas Gardens
Grundy Gardens
Brougham Gardens
Palmer Gardens
Prince Henry Gardens

Ester Lipman Gardens
Pioneer Women's Memorial Garden
Naval Gardens
Light's Vision
Victoria Park (north-east & central areas only)
Adelaide Zoo
West Terrace Cemetery
six squares (Victoria, Light, Hindmarsh, Hurtle, Whitmore and Wellington)
Playgrounds (West Terrace, Princess Elizabeth, South Terrace Glover, Marshmallow, East Terrace Glover, Rymill Park, Soldier's Memorial Gardens, Tidlangga Playspace, The Glover (North Adelaide), Bush Magic, Bonython Park Playspace)
dog parks (in Parks 5 & 18)
Source: Google maps 2018

Semi-formal landscape
Lundie Gardens
Denise Norton Park
Bullrush Park
Peace Park
Botanic Park
Frome Park
Rundle Park
Rymill Park (excl. Rose Garden)
King Rodney Park (north-west corner)
Victoria Park (East Terrace strip)
Ellis Park (West Terrace strip)
Bonython Park
Elder Park
Helen Mayo Park
Popeye area
Torrens Parade Ground
Olive Groves (Parks 7 & 8)
north and west areas around Adelaide Oval
Pinky Flat
Sources: CLMPs and Google maps 2018

Informal landscape
areas between sporting grounds and courts
woodland areas (excl. biodiversity conservation areas)
grassland areas (excl. biodiversity conservation areas)
depasturing areas
Victoria Park (excl. north-east & central areas)
Source: All other areas not identified as other categories

Biodiversity areas

Definition: COA is focusing efforts on biodiversity conservation in six key areas
Area 1 - Victoria Park
Area 2 - South-west
Area 3 - North 1
Area 4 - North 2
Area 5 - Botanic Park, Adelaide Zoo, North-east
Area 6 - Bonython Park
Source: Integrated Biodiversity Management Plan 2018–2023, p.26

Riparian areas
Definition: various water courses or bodies
River Torrens
ponds
creeks
wetlands
lakes
stormwater detention basin
swales
Sources: CLMPs, Google maps 2018 and maps in other land manager's management plans/strategies

Sport and recreation areas – hard surface
netball courts
basketball courts
tennis courts
Victoria Park criterium circuit
skate parks
Sources: CLMPs and Google maps 2018

Sport and recreation areas – turf surface
Adelaide Oval (excluding buildings)
sports ovals
sports pitches
archery range
bowling greens
North Adelaide Golf Course
Sources: CLMPs and Google maps 2018