

Kadaltilla

National Heritage Management Plan for the Adelaide Park Lands and City Layout

Thursday, 26 October 2023
Board Meeting

Author:

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Public

Purpose

The purpose of this report is for Kadaltilla / Adelaide Park Lands Authority (Kadaltilla) to note the submissions to the draft National Heritage Management Plan (NHMP) for the Adelaide Park Lands and City Layout, and to seek Kadaltilla's endorsement to submit the proposed National Heritage Management Plan for the Adelaide Park Lands and City Layout to the Commonwealth Government for approval.

The draft NHMP provided in this report has incorporated feedback from Kadaltilla, Community and Key Stakeholders.

The Federal Department of Climate Change, Energy, the Environment and Water recommended that all National Heritage Listings develop a National Heritage Management Plan. The draft NHMP incorporates policies for the ongoing management of the Adelaide Park Lands and City Layout in support of the National Heritage Listing.

The project has been undertaken in accordance with the funding agreement with the Federal Government to prepare a National Heritage Management Plan for the Adelaide Park Lands and City Layout.

The benefits of the Plan include greater clarity, promotion and protection of National Heritage Values, monitor any cumulative impacts of land uses to limit alienation of the Adelaide Park Lands, enhance the Adelaide Park Lands and City Layout and minimise potential heritage impacts and provide clear policy to guide development in the Adelaide Park Lands and within the City grid.

The next steps will include submission to the Australian Heritage Council for their approval.

Recommendation

THAT THE ADELAIDE PARK LANDS AUTHORITY ADVISES COUNCIL:

That the Kadaltilla / Adelaide Park Lands Authority:

1. Notes the consultation summary on the draft National Heritage Management Plan for the Adelaide Park Lands and City Layout contained in Attachment A to Item 6.1 on the Agenda for the Board meeting of Kadaltilla held on 26 October 2023.
2. Endorses the proposed National Heritage Management Plan for the Adelaide Park Lands and City Layout contained in Attachment B to Item 6.2 on the Agenda for the Board meeting of Kadaltilla held on 26 October 2023.
3. Requests Council considers the budget requirements outlined by the National Heritage Management Plan as part of future budget processes, commencing from the 2024/25 Annual Business Plan and Budget.

Implications

<p>Adelaide Park Lands Management Strategy 2015-2025</p>	<p>Adelaide Park Lands Management Strategy 2015-2025</p> <p>Outcome - Adelaide Park Lands are valued as a National Heritage site worthy of World Heritage listing.</p> <p>STRATEGY 5.1 - Ensure the values of the National Heritage listing are protected and promoted.</p> <p>Action 1 - Map and document all features of the Park Lands contributing to the values of the National Heritage listing and ensure their protection through:</p> <ul style="list-style-type: none"> • Incorporating these features in relevant Council strategies, plans and processes. • Specifying appropriate tree planting and maintenance regimes in asset management plans. • Development Plan policy protecting these features from development. • Developing trigger mechanisms to ensure that actions defined by the EPBC Act are not undertaken without appropriate prior assessment of their impacts on the National Heritage values.
<p>2020-2025 Strategic Plan</p>	<p>Adelaide Park Lands Authority 2020-2025 Strategic Plan</p> <p>Strategic Plan Alignment – Environment</p> <p>2.1 Design, protect and enhance landscape values and design qualities</p>
<p>Policy</p>	<p>The National Heritage Management Plan incorporates policies for the ongoing management of the Adelaide Park Lands and City Layout in support of the National Heritage Listing.</p>
<p>Consultation</p>	<p>Broad community consultation on the draft National Heritage Management Plan opened on 28 February 2023 and closed on 28 March 2023. Targeted consultation was undertaken with key stakeholders included the Department for Environment and Water, Department for Infrastructure and Transport, Adelaide Park Lands Association, Kaurna Yerta Aboriginal Corporation as well as land managers including universities, schools, Botanic Gardens, Adelaide Zoo, Cemeteries Authority.</p>
<p>Resource</p>	<p>Not as a result of this report.</p>
<p>Risk / Legal / Legislative</p>	<p>The project is being delivered in accordance with the funding agreement with the Federal Government to prepare a National Heritage Management Plan for the Adelaide Park Lands and City Layout.</p>
<p>Opportunities</p>	<p>To improve understanding of the National Heritage Values of the Adelaide Park Lands and City Layout and inform future development, decision making and management strategies for the place. Completion of the National Heritage Management Plan supports the World Heritage Bid nomination.</p>
<p>City of Adelaide Budget Allocation</p>	<p>Under the Australian Heritage Grants Funding Agreement, Council contributed \$25,000 in 2022/23 towards the development of the National Heritage Management Plan.</p> <p>There are recommendations with future budget impacts across the next 2-5 years, for consideration in future budget processes, commencing with the 2024/25 financial year.</p>
<p>Life of Project, Service, Initiative or (Expectancy of) Asset</p>	<p>The National Heritage Management Plan will be used for the ongoing management of the Adelaide Park Lands and City Layout to maintain, protect and enhance the heritage listed values.</p>
<p>Ongoing Costs (eg maintenance cost)</p>	<p>The National Heritage Management Plan is required to be reviewed in 5 years by the <i>Environment Protection and Biodiversity Conservation Act 1999 (Commonwealth)</i>.</p>
<p>Other Funding Sources</p>	<p>The project is funded under the Federal Government’s Australian Heritage Grants Program.</p>

Discussion

Background

1. The City of Adelaide secured Federal Government funding under the Australian Heritage Grants Program in April 2022 to prepare a National Heritage Management Plan (the National HMP) for the Adelaide Park Lands and City Layout which is listed as a National Heritage Place.
2. Swanbury Penglase was engaged to develop the draft National HMP to improve understanding of the National Heritage Values of the Adelaide Park Lands and City Layout and inform future development, decision making and management strategies for the place.
3. The role of the National HMP is to:
 - 3.1. Provide clear direction, guidance and information for land managers to protect and manage heritage listed values of the National Heritage Place.
 - 3.2. Identify and articulate the values of the place to guide day-to-day management and to assist in future decision-making for conservation, interpretation, and visitation by providing clear guidance to ensure no adverse impact on the heritage listed values.
 - 3.3. Ensure the heritage values and the linked physical components are appropriately cared for.
4. The development of the National HMP provides the opportunity to:
 - 4.1. Provide greater clarity on National Heritage Values.
 - 4.2. Identify attributes that diminish the National Heritage Values.
 - 4.3. Monitor potential cumulative impacts of land uses and limit further alienation of the Adelaide Park Lands.
 - 4.4. Maintain and enhance the Adelaide Park Lands and City Layout.
 - 4.5. Minimise potential heritage impacts and provide clear policy to guide development in the Adelaide Park Lands and within the City grid.
 - 4.6. Provide policy to guide leasing agreement heritage impacts.

Stakeholder Consultation

5. During the development of the draft National HMP, Swanbury Penglase consulted with key internal and external stakeholders. Workshops were held with the Kadaltilla/Adelaide Park Lands Authority and the City of Adelaide's Reconciliation Committee and City Planning Development and Business Affairs Committee of Council.
6. The purpose of the engagement process was to:
 - 6.1. Inform key stakeholders about the purpose of the Adelaide Park Lands and City Layout National HMP.
 - 6.2. Seek feedback on proposed management policies that may affect the use, association, and enjoyment of the Adelaide Park Lands and City Layout.
 - 6.3. Build partnerships to support future delivery.
 - 6.4. Create a shared understanding of the National HMP and what it aims to achieve.
7. Consultation opened on 28 February 2023 and closed on 28 March 2023 with the community. Targeted consultation was undertaken with key stakeholders and Adelaide Park Lands land managers including:
 - 7.1. Department for Environment and Water
 - 7.2. Department for Infrastructure and Transport
 - 7.3. Adelaide Park Lands Association
 - 7.4. Kurna Yerta Aboriginal Corporate (KYAC)
 - 7.5. Universities
 - 7.6. Schools
 - 7.7. Adelaide Botanic Gardens
 - 7.8. Adelaide Zoo
 - 7.9. Cemeteries Authority.

8. Feedback has been provided by the Commonwealth Heritage Branch of the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on the National HMP and compliance specific to the *Environment Protection and Biodiversity Conservation Act (1999)* (EPBC Act).

Consultation Feedback

9. In response to the consultation process 24 submissions were received. Copies of all written submissions are contained in **Attachment A**.
10. Some of the key issues raised during consultation included:
 - 10.1. Further description required on the condition and integrity of the National Heritage Values.
 - 10.2. The current strategies with respect to First Nations input to decisions that affect the management of the Adelaide Park Lands were not specific enough to satisfy the requirements of *Schedule 5* of the EPBC Act.
 - 10.3. Contemporary threats faced by the Adelaide Park Lands were not adequately addressed including:
 - 10.3.1. Ongoing conservation and management challenges despite National Heritage Listing and *Adelaide Park Lands Act*.
 - 10.3.2. Lack of coherence between legislative frameworks for different levels of government (National, State and Local).
 - 10.3.3. Lack of shared policy for land managers.
 - 10.3.4. Planning system dictating changes to cultural landscape management policy.
 - 10.3.5. Lack of public scrutiny of heritage impact assessment including those for Kaurana Country.
 - 10.3.6. Introduction of special legislation to override the *Adelaide Park Lands Act 2005 (SA)*.
 - 10.4. Greater recognition of stakeholder group consultation in ongoing management and review of the National HMP.
 - 10.5. Greater clarity on who will be responsible for each of the policies (contained in Chapter 7 of the National HMP).

Consultation Outcomes

11. Following consultation feedback, and in response to the key issues raised, the following key changes to the National HMP are proposed:
 - 11.1. Corrections to text and formatting for ease of use.
 - 11.2. Revisions to **Section 5 – Heritage Significance, ‘Attributes of National Value’** table to include a condition rating for each attribute.
 - 11.3. Revision of **Chapter 6** to include a **‘Key Issues’** section (**Section 6.8**) to include recent actions that may impact the National Heritage Values including discussion about the Royal Adelaide Hospital, new Women’s and Children’s Hospital and Karen Rolton Oval.
 - 11.4. Clearly articulated responsibilities for community and stakeholder engagement including community groups and First Nations people.
 - 11.5. Amendment to policy wording in **‘Chapter 7 – Conservation Policy** and inclusion of responsibilities and priority for implementation.
 - 11.6. Inclusion of a policy in Chapter 7 – Conservation Policy, that encourages the development of a **Conservation Agreement** between the City of Adelaide, State Government and Commonwealth Government that defines an appropriate level of development within and adjacent to the Park Lands which does not detract from their National Values.
 - 11.7. Inclusion in Section 7 - Conservation Policy, of a **Compliance Table** with the EPBC Act and the *Environment Protection and Biodiversity Conservation Regulations (2003)*.

Response to Kadaltilla Feedback

12. In response to Kadaltilla feedback [[Link 1](#)] the following changes have been made to the draft National HMP:
 - 12.1. Inclusion of a new section on development in the Adelaide Park Lands about cumulative impact on the Adelaide Park Lands.
 - 12.2. New policy encouraging development of a Conservation Agreement between the Commonwealth, State and City of Adelaide to protect the National Heritage Values of the Adelaide Park Lands and City Layout.

- 12.3. Recommends expert advice to assist in interpreting the National Heritage Values and through the preparation of a Heritage Impact Statement.
- 12.4. Encourage pre-referral meeting for advice and determine whether referral to the Commonwealth Government is required.
- 12.5. New policy supporting the long-standing role of community groups dedicated to protecting the Adelaide Park Lands.

City of Adelaide responsibilities

13. Implementation priorities proposed to be delivered by the City of Adelaide are contained in Chapter 7 of the document. The recommendations are a combination of policy considerations, legislative requirements and actions (the latter identified by a timeframe for implementation).
14. City of Adelaide's will prioritise implementation of:
 - 14.1. GIS mapping of National Heritage Value items, which will also be included as layers within the City Plan for integration with other key spatial layers.
 - 14.2. Management Plan for historic plantings including identification, assessment, maintenance recommendations, replacement species and climate change assessment.
 - 14.3. Strategic assessment (already in progress) on cumulative impacts, encroachment and impact management.
 - 14.4. Heritage survey of Park Lands landscape elements.
 - 14.5. Planning Code Amendment to reflect EPBC requirements in SA Planning system.
15. The above projects reinforce and strengthen the National Heritage Values in several existing statutory frameworks including the Adelaide Park Lands Management Strategy and Planning and Design Code.

Next Steps

16. Pending decision on the draft National HMP by Council, it will be submitted to the Australian Heritage Council.
17. Feedback from the Commonwealth will be collated into a final draft for Australian Heritage Council approval.
18. On receiving Commonwealth endorsement, all participants will be updated and internal process changes will be enacted for implementation and management of the National HMP for the Adelaide Park Lands and City Layout.
19. As a public document the National HMP is referenced in the draft Adelaide Park Lands Management Strategy by Kadaltilla, and by the City of Adelaide Community Land Management Plans for the Adelaide Park Lands.
20. Implementation of priority actions by the City of Adelaide across the next 2 to 5 years is estimated at \$380,000, which will be progressed for consideration through future budget processes.

Data and Supporting Information

Link 1 – Kadaltilla Feedback on draft National Heritage Management Plan

Attachments

Attachment A – Consultation Summary Report – Draft National Heritage Management Plan dated February 2023

Attachment B – Proposed National Heritage Management Plan for the Adelaide Park Lands and City Layout