

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

Strategic Alignment - Dynamic City Culture

Public

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City Planning, Development and Business Affairs Committee

Program Contact:
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Approving Officer:
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EXECUTIVE SUMMARY

The purpose of this report is for the City Planning, Development and Business Affairs Committee to note the submissions to the draft National Heritage Management Plan (National HMP) for the Adelaide Park Lands and City Layout, and to seek the Committee's endorsement to submit the proposed National Heritage Management Plan for the Adelaide Park Lands and City Layout to the Commonwealth Government for approval.

RECOMMENDATION

The following recommendation will be presented to Council on 14 November 2023 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL:

THAT COUNCIL

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 7.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 7 November 2023.
2. Approves the proposed National Heritage Management Plan for the Adelaide Park Lands and City Layout contained in Attachment B to Item 7.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 7 November 2023
3. Notes 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.
4. Authorises the Chief Executive Officer to finalise the National Heritage Management Plan for the Adelaide Park Lands and City Layout as contained in Attachments B, to Item 7.1 on the Agenda for the City Planning, Development and Business Affairs Committee held on 7 November 2023 for submission to the Commonwealth Government.
5. Authorises the Chief Executive Officer to make further amendments to the National Heritage Management Plan for the Adelaide Park Lands and City Layout following feedback from the Commonwealth Government as contained in Attachments B, to Item 7.1 on the Agenda for the City Planning, Development and Business Affairs Committee held on 7 November 2023.

IMPLICATIONS AND FINANCIALS

City of Adelaide 2020-2024 Strategic Plan	Strategic Alignment – Dynamic City Culture 3.2 - Pursue world and state heritage listing for the Adelaide Park Lands and City Layout.
Policy	The National Heritage Management Plan will develop policies for the ongoing management of the Adelaide Park Lands and City Layout in support of the National Heritage Listing.
Consultation	Broad community consultation on the draft National Heritage Management Plan ran from 28 February 2023 to 28 March 2023. Targeted consultation was undertaken with key stakeholders including the Department for Environment and Water, Department for Infrastructure and Transport, Adelaide Park Lands Association, Kaurna Yerta Aboriginal Corporation as well as lands managers including universities, schools, Adelaide Botanic Garden, Adelaide Zoo and the Adelaide Cemeteries Authority.
Resource	Not as a result of this report
Risk / Legal / Legislative	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.
Opportunities	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
23/24 Budget Allocation	Under the Australian Heritage Grants Funding Agreement Council contributed \$25,000 in 2022/23 towards the development of the National Heritage Management Plan.
Proposed 24/25 Budget Allocation	Recommendation of future budget impacts of approximately \$380,000 for consideration across the next 2-5 years, commencing with the 2024/25 financial year.
Life of Project, Service, Initiative or (Expectancy of) Asset	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.
23/24 Budget Reconsideration (if applicable)	The project has been considerably funded by the Federal Government through the 2021-2022 Australian Heritage Grants Program. The agreement for Federal Government funding has been extended until 30 Dec 2023.
Ongoing Costs (eg maintenance cost)	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> .
Other Funding Sources	The project is funded under the Federal Government's Australian Heritage Grants Program.

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 (National HMP) for the Adelaide Park Lands and City Layout which is listed as a National Heritage Place.
2. The Federal Department of Climate Change, Energy, the Environment and Water (DCCEEW) recommends that all National Heritage Listings develop a National Heritage Management Plan.
3. Swanbury Penglase was engaged to develop the 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. The draft National HMP incorporates policies for the ongoing management of the Adelaide Park Lands and City Layout in support of the National Heritage Listing.
4. The project has been undertaken in accordance with the funding agreement with the Federal Government to prepare a National HMP for the Adelaide Park Lands and City Layout.
5. The role of the National HMP is to:
 - 5.1. Provide clear direction, guidance and information for land managers to protect and manage heritage listed values of the National Heritage Place.
 - 5.2. 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.
 - 5.3. Ensure the heritage values and the linked physical components are appropriately cared for.
6. The development of the National HMP provides the opportunity to:
 - 6.1. Ensure greater clarity on National Heritage Values.
 - 6.2. Identify attributes that diminish the National Heritage Values.
 - 6.3. Monitor potential cumulative impacts of land uses and limit further alienation of the Adelaide Park Lands.
 - 6.4. Maintain and enhance the Adelaide Park Lands and City Layout.
 - 6.5. Minimise potential heritage impacts and provide clear policy to guide development in the Adelaide Park Lands and within the City grid.
 - 6.6. Provide policy to guide leasing agreement heritage impacts.
7. 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.

Stakeholder Consultation

8. During the development of the draft National HMP, Swanbury Penglase consulted with key internal and external stakeholders. Workshops were held with the City Planning Development and Business Affairs Committee, Kadaltilla / Adelaide Park Lands Authority and the Reconciliation Committee.
9. The purpose of the engagement process was to:
 - 9.1. Inform key stakeholders about the purpose of the Adelaide Park Lands and City Layout National HMP.
 - 9.2. Seek feedback on proposed management policies that may affect the use, association, and enjoyment of the Adelaide Park Lands and City Layout.
 - 9.3. Build partnerships to support future delivery.
 - 9.4. Create a shared understanding of the National HMP and what it aims to achieve.
10. 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:
 - 10.1. Department for Environment and Water
 - 10.2. Department for Infrastructure and Transport

- 10.3. Adelaide Park Lands Association
 - 10.4. Kurna Yerta Aboriginal Corporate (KYAC)
 - 10.5. Universities
 - 10.6. Schools
 - 10.7. Adelaide Botanic Gardens
 - 10.8. Adelaide Zoo
 - 10.9. Cemeteries Authority.
11. 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

12. In response to the consultant process 24 submissions were received. Copies of all written submissions are contained in **Attachment A**.
13. Some of the key issues raised during public consultation included:
- 13.1. Further description required on the condition and integrity of the National Heritage Values.
 - 13.2. 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*.
 - 13.3. Contemporary threats faced by the Adelaide Park Lands were not adequately addressed including:
 - 13.3.1. Ongoing conservation and management challenges despite National Heritage Listing and *Adelaide Park Lands Act*.
 - 13.3.2. Lack of coherence between legislative frameworks for different levels of government (National, State and Local).
 - 13.3.3. Lack of shared policy for land managers.
 - 13.3.4. Planning system dictating changes to cultural landscape management policy.
 - 13.3.5. Lack of public scrutiny of heritage impact assessment including those for Kurna Country.
 - 13.3.6. Introduction of special legislation to override *Adelaide Park Lands Act*.
 - 13.4. Greater recognition of stakeholder group consultation in ongoing management and review of the National HMP.
 - 13.5. Greater clarity on who will be responsible for each of the policies (contained in Chapter 7 of the National HMP).

Consultation Outcomes

14. Following consultation feedback, and in response to the key issues raised, the following key changes to the National HMP are proposed:
- 14.1. Corrections to text and formatting for ease of use.
 - 14.2. Revisions to **Section 5 – Heritage Significance, ‘Attributes of National Value’** table to include a condition rating for each attribute.
 - 14.3. 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.
 - 14.4. Clearly articulated responsibilities for community and stakeholder engagement including community groups and First Nations people.
 - 14.5. Amendment to policy wording in **Chapter 7 – Conservation Policy** and inclusion of responsibilities and priority for implementation.
 - 14.6. 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 Federal Government that defines an appropriate level of development within and adjacent to the Adelaide Park Lands which does not detract from the National Heritage Values.

- 14.7. Inclusion in **Section 7 - Conservation Policy**, of a Compliance Table with the *EPBC Act* and the *Environment Protection and Biodiversity Conservation Regulations (2003)*.
15. The draft National HMP provided in this report has incorporated feedback from Community and Key Stakeholders.

City of Adelaide responsibilities

16. 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).
17. City of Adelaide will prioritise implementation of:
 - 17.1. 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.
 - 17.2. Management Plan for historic plantings including identification, assessment, maintenance recommendations, replacement species and climate change assessment.
 - 17.3. Strategic assessment (already in progress) on cumulative impacts, encroachment and impact management.
 - 17.4. Heritage survey of Adelaide Park Lands landscape elements.
 - 17.5. Planning Code Amendment to reflect EPBC requirements in SA Planning system.
18. 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

19. The draft National HMP will be submitted to the Australian Heritage Council.
20. Feedback from the Federal Government will be collated into a final draft for Australian Heritage Council approval.
21. On receiving Federal 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.
22. As a public document the National HMP will be referenced in the draft Adelaide Park Lands Management Strategy, and by the City of Adelaide Community Land Management Plans for the Adelaide Park Lands.
23. 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.

ATTACHMENTS

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

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

- END OF REPORT -