

NATIONAL HERITAGE MANAGEMENT PLAN FOR THE ADELAIDE PARK LANDS AND CITY LAYOUT

SUMMARY OF SUBMISSIONS AND RESPONSE

VERSION - 17 OCTOBER 2023

Background

In 2008 'The Adelaide Park Lands and City Layout' was inscribed on the National Heritage List (NHL) by the Commonwealth of Australia and defined in Environment Protection and Biodiversity Conservation (EPBC) Regulations 2000 (Com).

The requirements of a management plan for a National Heritage Place and the fundamental principles for appropriate heritage management are contained in the EPBC Regulations (schedules 5A and 5B). Schedule 5B requires that:

5. The management of National Heritage places should make timely and appropriate provision for community involvement, especially by people who:

(a) have a particular interest in, or association with, the place; and

(b) may be affected by the management of the place.

The consultation draft of the National Heritage Management Plan (HMP) for the Adelaide Park Lands and City Layout was prepared by Swanbury Penglase dated February 2023.

In response to Schedule 5B the engagement had the following purpose:

- Inform key stakeholders about the purpose of the Adelaide Park Lands and City Layout HMP.
- Seek their views and gather responses to proposed management policies that may affect their use, association, and enjoyment of the Park Lands and City Layout.
- Build partnerships to support future delivery.
- Create a shared understanding of the objectives of the HMP.

The **goals and methodology of engagement** were:

- Seek feedback from stakeholders on proposed draft policies to manage the national heritage values of the Park Lands and City Layout.
- Offer a range of opportunities for stakeholders to give an opinion through Your Say Adelaide and written submissions following a formal presentation of the draft policies.
- Consult with directly affected stakeholders via a survey to identify how they currently use/manage the Park Lands and how their needs can be considered in the development of heritage policy.
- Invite stakeholders to identify key issues and opportunities that affect the conservation of the Park Lands and its ongoing use.

The resultant feedback and comments from the engagement process were provided to the consultants and Council for consideration in the evolving HMP.

Public Consultation

Consultation ran from 28 February 2023 to 28 March 2023.

Submissions were invited from a range of State Government agencies, Commonwealth Heritage agencies, adjacent local government areas, institutions, and environment and community organisations including:

- Department for Environment and Water
- Department for Infrastructure and Transport
- Surrounding local Councils
- Adelaide Park Lands Association
- Kurna Yerta Aboriginal Corporate (KYAC)
- Universities
- Schools
- Adelaide Botanic Gardens
- Adelaide Zoo
- Cemeteries Authority.

Response to Engagement & Submissions

A brief summary of the engagement response is provided below while details of specific responses to the engagement process reflected in the updated HMP are provided in the table in the following section. Feedback was received from:

- Heritage, Reef & Ocean Division| Heritage Branch | Cultural Heritage Section, Department of Climate Change, Energy, the Environment and Water
- Green Adelaide
- Heritage SA (DEW)
- Department of Infrastructure and Transport (SA)
- SA Water
- Minister for Planning (Nick Champion)
- Adelaide Cemeteries Authority
- University of Adelaide
- Botanic Gardens and State Herbarium
- Central Adelaide Local Health Network
- City of West Torrens
- City of Charles Sturt
- South West City Community Association
- The North Adelaide Society
- Adelaide Park Lands Association
- South East City Residents Association
- 6 x email respondees
- 8 x Your Say submissions
- 1 x community member letter

A total of 31 submissions were received and are detailed in the **Appendix**.

Council Boards & Committees

Council sought comment and feedback on the draft HMP from the following board/committee meetings:

- Kadaltilla / Adelaide Park Lands Authority (30 March 2023)
- Reconciliation Committee (22 March 2023)
- City Planning, Development and Business Affairs(7 March 2023)

Swanbury Penglase assisted in the preparation and delivery of content for these workshops.

Following the presentations, members were invited to provide further responses. Following this presentation, Kadaltilla / APLA submitted a revised version of their original submission.

Community consultation

Online engagement was undertaken through YourSay promoted through various Council social media and online platforms. The engagement response was as follows:

- **493 'Aware' visitors:** These are unique visitors which could be individuals, or individuals visiting on behalf of organisations. These visitors have made 810 visits to the Your Say Adelaide page which means some visitors will have visited the page more than once.
- **241 'Informed' visitors:** These are visitors that have explored the available consultation materials more closely to learn more about your project e.g. browsed the FAQs, viewed the draft management plan etc.
- **8 'Engaged' visitors:** These are the people who have submitted feedback through the survey.

Additional to these submissions, a further 8 community responses were received through the consultation email address:

NatHeritMgmtPI@cityofadelaide.com.au

Kadaltilla / Adelaide Park Lands Authority Submission to Draft National Heritage Management Plan on 30 March 2023

Summary of Submission	Response
<p>1. Kadaltilla/APLA requests that the following issues be clearly identified and policy to address the issues considered.</p>	
<p>1.1 Zoning and the Planning & Design Code Changes to the zoning provisions for the Adelaide Park Lands Zone through a state-controlled Code Amendment process can undermine National Heritage management policy contained in those provisions.</p>	<p>Reference to concurrence of Planning and Design Code with NHMP policies/EPBC Act requirements within document.</p> <p>Include in implementation to review the provisions of the South Australian Planning and Design Code for concurrence with the polices of this Heritage Management Plan and prepare appropriate amendments for integration in future Code revisions including associated online spatial mapping and reference to all heritage levels such as world, commonwealth, national, state and local heritage listings on the heritage layer.</p>
<p>1.2 Community Land Management Plans Community Land Management Plans are routinely changed retrospectively (or simultaneously) to accommodate developments, rather than the plans guiding development.</p>	<p>Community land management plans to be updated in regular update cycle to reflect 5yr NHMP review cycle.</p> <p>Include reference to update for concurrence in revision cycle for CLMPs.</p>
<p>1.3 Adelaide Park Lands Management Strategy The Strategy is prepared by Kadaltilla/APLA and is endorsed by both Adelaide City Council and the State Planning Minister, however the provisions of this Strategy and the advice of Kadaltilla/APLA is regularly ignored.</p>	<p>The draft NHMP strengthens references to the Act and the roles required of State Government. Whilst the comment does not relate directly to content of the NHMP, the feedback is noted.</p>
<p>1.4 State Heritage Listing - The need for heritage management policy to be in place has been put forward as the reason for the delay of the State Heritage listing of the Adelaide Park Lands despite the fact that such listings have historically occurred ahead of the drafting of management plans or heritage standards.</p>	<p>The National HMP in Section 7.1.4 of Chapter 7 advocates support for State Heritage listing of the Adelaide Park Lands and City Layout.</p> <p>Refer to Chapter 7 Section 7.4.1 - Policy and Recommendations Table (page 208).</p>
<p>2. Kadaltilla/APLA notes that the recommendation to align the state Adelaide Park Lands Act boundary with the National Heritage listing boundary may be contentious and suggests that there be extensive consultation on this recommendation ahead of any redefinition and suggests the following wording:</p> <p><i>In consultation with the broader community</i> Kadaltilla/APLA should review and consider redefining the boundary of the Adelaide Park Lands under the Adelaide Park Lands Act 2005 to align to the National Heritage List boundary.</p>	<p>Any changes to the Adelaide Park Lands Act would be done in consultation with Kadaltilla / APLA.</p> <p>Delete 7.1.5 - any changes to the Adelaide Park Lands Act would be done in consultation with Kadaltilla / APLA.</p>
<p>3. Kadaltilla/APLA requests consideration of the following with regard to the discussion and recommendations around the EPBC Act referral process:</p>	<p>Additional detail about the referral process included in sections:</p>

<p>3.1 Insert some discussion or case studies of how to relate the values and attributes of the National Heritage listing to development applications (especially for buildings and other infrastructure)</p> <p>3.2 Identify and give examples or guidelines on the assessment of significant impact, <u>including incremental impacts</u> that may become significant over time.</p> <p>3.3 Provide clear information on how and in what context bodies such as the City of Adelaide and/or Kadaltilla/APLA might instigate federal referrals or Ministerial intervention under the EPBC Act where the proponent neglects to do so</p>	<ul style="list-style-type: none"> - 6.2.1 <i>Environment Protection and Biodiversity Conservation (EPBC) Act 1999 (Cth)</i> - 6.8.1 Encroachment and Development - 6.8.2 Past Referrals to the Commonwealth <p>Add a new section 6.2.2 – Instigating a Referral to within Chapter 6 include discussion on referrals.</p> <p>Add a further new section 6.8.2 – Past referrals to the Commonwealth to identify some of the issues that have been encountered.</p> <p>Refer to Chapter 6 Section 6.2.2 – Instigating a Referral (page 179) and 6.8.2 - Past Referrals to the Commonwealth (page 196)</p>
<p>4. Acknowledge and support the role of community advocacy and volunteerism as a National Heritage value</p> <p>Provide a recommendation to support advocacy and volunteerism (such as Kaurna-led education and tourism programs, Trees for Life biodiversity projects and the Adelaide Park Lands Association's Guided Walks and Park Ambassador programs).</p>	<p>Integrate recommendation to support advocacy and volunteerism (such as Kaurna-led education and tourism programs, Trees for Life biodiversity projects and the Adelaide Park Lands Association's Guided Walks and Park Ambassador programs) into Implementation Strategy table</p>
<p>5. Alter the following recommendations on the grounds that there can be tension between (i) the need to restore and protect areas of native vegetation and re-generation and (ii) proposals for activation</p> <p>2.1.5 Identify areas at risk of encroachment within the Park Lands and prioritise these for activation projects and events to encourage community use, appreciation, and connection with the Park Lands.</p> <p>2.3.2 Identify areas at risk of alienation and prioritise these for activation projects and events to encourage community use, appreciation, and connection with the Park Lands.</p> <p>Instead of suggesting only "activation projects" for alienated sites, better wording for 2.1.5 and 2.3.2 might be</p> <p>Identify areas at risk of alienation/encroachment and prioritise these for restoration projects, cultural programming and temporary events to encourage community use, appreciation, and connection with the Park Lands.</p>	<p>Refine policies in Chapter 7.</p> <p>Delete 2.3.2 (duplication) and amend Recommendation 2.1.5 (now 1.1.5) within Chapter 7 as follows:</p> <p>Recommendation 1.1.5 - Identify areas at risk of <u>alienation/encroachment within the Park Lands</u> and prioritise these for <u>restoration projects, cultural programming and temporary activation projects</u> and events to encourage <u>a more diverse</u> community use, <u>broader</u> appreciation, and connection with the Park Lands, <u>with the aim that these areas are not seen as areas for development.</u></p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 20)</p>
<p>6. In addition to the above Kadaltilla/APLA suggests consideration of the following recommendations:</p>	
<p>6.1 That the P&D Code include an overlay or trigger for all levels of heritage listings for South Australia: World; Commonwealth; National; State; and Local Heritage, and that these heritage places are also identified in appropriate spatial mapping.</p>	<p>Add spatial mapping policy.</p> <p>Revise Recommendation 7.3.3 (now 6.3.2) within Chapter 7 as follows:</p> <p>Recommendation 6.3.2 - Review the provisions of the South Australian Planning and Design Code for concurrence with the polices of this Heritage Management</p>

	<p>Plan and prepare appropriate amendments for integration in future Code revisions <u>including associated online spatial mapping and reference to all heritage levels such as world, commonwealth, national, state and local heritage listings on the heritage layer.</u></p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 209)</p>
<p>6.2 Analysis be undertaken to establish the carrying capacity for the Adelaide Park Lands which defines the extent and character of sympathetic development consistent with the protection of National Heritage values, (recognising that the Adelaide Park Lands are likely already close to capacity)</p>	<p>Refer response to Kadaltilla/APLA 6.4</p>
<p>6.3 Consideration be given to undertaking a strategic assessment under the EPBC Act, as a higher level strategic planning process for the National Heritage place. This might include the carrying capacity analysis recommended above.</p>	<p>Recommend a 'Conservation Agreement is recommended in Chapter 7.</p> <p>Revise Chapter 7 as follows and insert the following policies and recommendations:</p> <p>Policy 6.10 – Form a Conservation Agreement under the EPBC Act between the Commonwealth Minister for the Environment and the South Australian state government, in consultation with Kadaltilla / Adelaide Park Lands Authority, to protect the National heritage values of the Adelaide Park Lands and City Layout. The agreement should describe an appropriate level of development in the Park Lands as well as in adjacent previously alienated areas of Park Land</p> <p>Recommendation 6.10.1 - Engage an expert consultant to facilitate and establish a Conservation Agreement under the EPBC Act between the Commonwealth Minister for the Environment and the South Australian state government, in consultation with Kadaltilla / Adelaide Park Lands Authority and other relevant stakeholders with the purpose of defining acceptable levels of development within and adjacent to the Park Lands.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 210)</p>
<p>6.4 That the tracking of cumulative impacts be undertaken with specific reference to the National Heritage listing boundary of the Adelaide Park Lands in a methodical and measured fashion that considers:</p> <ul style="list-style-type: none"> - potential impacts; - historical trends; - projected trends, with carrying capacity '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 carrying capacity 'bandwidths'. 	<p>The Park Lands have had varied uses historically, many of which have disappeared while others have emerged.</p> <p>A condition assessment is a requirement of the HMP review, and policy can be strengthened to include mention of cumulative impacts and historical trends.</p> <p>Change Policy wording to Policy 8.3 to strengthen consideration of cumulative impacts and use trends.</p> <p>Amend Policy 8.3 within Chapter 7 as follows:</p> <p>The Heritage Management Plan is reviewed every five years, consistent with Section 341X of the EPBC Act, or sooner should major change <u>or significant cumulative impacts</u> occur in the interim.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 212)</p>

	<p>Also, refer above to DCCEEW comments regarding cumulative change and suggested new Policy and Recommendation as per below:</p> <p>Policy 1.7 - Protect the Park Lands from future potential cumulative impacts of land use.</p> <p>Recommendation 2.7.1 - Reduce potential cumulative impacts on the Park Lands by monitoring and evaluating changes in land use and implementing a holistic view of tracking any proposed changes. This HMP should act as a snapshot in time and provides a record of the state of the National Heritage values by which a comparison should be made with any future changes.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 202)</p>
<p>6.5 A review be undertaken to establish how City, State and Commonwealth systems can achieve greater coherence in the protection and management of the National Heritage place, including with regard to heritage impact assessment, and to assist in identifying owner and proponent obligations under the EPBC Act.</p>	<p>As noted above, include in discussion of referral process. Include as a recommendation within Chapter 7 to investigate options to develop a strategic approach at State, Commonwealth and local level to manage development impact on the Adelaide Park Lands and City Layout. Option could include Conservation Agreement between the three levels of government.</p>

External Submission

	Stakeholder	Summary of Submission	Response
Federal Government			
1.	<p>Heritage, Reef and Ocean Division Heritage Branch Cultural Heritage Section</p> <p>Department of Climate Change, Energy, the Environment and Water</p>	<p>Overall document</p> <p><i>Commonwealth and State government departments</i></p> <p>In 2022 the Commonwealth Government created a new department with responsibility for World, National and Commonwealth heritage places and the EPBC Act. Please change all references currently to the Department of Agriculture, Water and the Environment to: the Department of Climate Change, Energy, the Environment and Water (DCCEEW).</p> <p>When referencing government departments, we recommend specifying if they are Commonwealth or State departments. This is to avoid confusion regarding responsibility as some departments have the same name.</p>	<p>Replace 'Department of Agriculture, Water and the Environment– Historic Heritage Section (Federal Government)' with 'Department of Climate Change, Energy, the Environment and Water (DCCEEW) (Commonwealth Government)' where referenced.</p> <p>Replace 'Australian Department of Agriculture, Water and the Environment' with 'Commonwealth Government Department of Climate Change, Energy, the Environment and Water where referenced.</p> <p>Edit HMP to ensure there is a clear distinction when referencing Commonwealth or State Government Departments by making specific reference.</p>
		<p><i>Factual and grammatical errors</i></p> <p>The HMP includes factual and grammatical errors in chapters 1,2,5 and 6. These include misnaming Edward Gibbon Wakefield in Background 2.1, as well as inconsistencies with the use of abbreviations, naming conventions, capitalisation and incomplete sentences. Recommend these chapters are reviewed and thoroughly proofread and edited for consistency and accuracy.</p>	<p>Review, edit and rewrite to ensure:</p> <ul style="list-style-type: none"> • Correct factual and grammatical errors in chapters 1,2,5 and 6. • Correct the naming of Edward Gibbon Wakefield • Consistent use of abbreviations, naming conventions, capitalisation and incomplete sentences.
		<p><i>Difficulty in navigation</i></p> <p>At nearly 300 pages the document is large and difficult to navigate. With HMPs of this size the department recommends 'bookmarking' the document when saving it as a PDF, so that a navigation pane acts as a contents page and allows for ease in accessing information. This is particularly important for the daily management of</p>	<p>Implement bookmarking for the PDF.</p> <p>CoA separated chapters for the purpose of community consultation. All chapters were publicly available.</p>

Recommendation 1 - Item 7.1 - Attachment A

	Stakeholder	Summary of Submission	Response
		heritage places to ensure accurate and efficient decision making.	
		<p><i>Useability</i></p> <p>The aim of a HMP is to guide the management of a heritage listed place to ensure that all people involved with the place have ready access to policies they must follow and the context for why. Whilst the HMP is necessary for place managers and decision makers to make decisions and guide changes or development at a heritage place, it must also be useable for tradespeople, local councils and anyone interested in using or maintaining the place.</p> <p>The useability of the HMP could be improved in several ways including:</p>	
		<ul style="list-style-type: none"> Reducing the length of Chapter 3 – Historical background. This chapter is well written but would recommend only including the necessary context and not as much detail. Alternatively, a separate detailed history may be provided as an appendix. 	<p>Retain Chapter 3 but relocate Section 3.11 – key Historical Plans of Adelaide and Section 3.12 – Key Plans of Park Lands Alienation to Appendix F.</p> <p>Relocate Section 3.10 - Chronology of Major Events to Appendix E.</p> <p>These changes will reduce Chapter 3 by 54 pages making the document easier to read and more useable.</p> <p>Refer to Appendix E and F.</p>
		<ul style="list-style-type: none"> Move all end notes and footnotes throughout the HMP to the end of the document, as they currently detract from the readability of the document. It should also be noted the HMP inconsistently uses footnotes or end notes, recommend using only one form of referencing for usability. 	<p>Replace Footnotes with Endnotes.</p> <p>All Endnotes will be located at the end of the document.</p> <p>Refer to Endnotes.</p>
		<ul style="list-style-type: none"> Remove Section 3.11 Key Historical Plans of Adelaide and 3.12 Key plans of the Park Lands Alienation to be appendices to the HMP. 	<p>Relocate Section 3.11 - Key Historical Plans of Adelaide and Section 3.12 - Key Plans of the Park Lands Alienation in the Appendix F.</p> <p>Refer to Appendix F.</p>

	Stakeholder	Summary of Submission	Response
		<ul style="list-style-type: none"> Recommend page numbers are continuous throughout the document, not restarting for each chapter. 	Page numbering to be continuous.
		<p>Section 1.2 - Recommendations</p> <p>If recommendations are placed at the front of the document, it is recommended that the policy they align to is included for reference. These policies should guide the daily operations of the place and provide advice for decision makers during times of change or development. The recommendations will be most useful if they all align with a dedicated policy and are referenced as such. If the recommendation does not align to a policy, then consider whether they may be removed to reduce the number of recommendations.</p>	<p>Include Policy number reference to each recommendation within Chapter 1, Section 1.2 of the HMP.</p> <p>Refer to Chapter 1, Section 1.2 - Recommendations (page 6).</p> <p>Refer to Chapter 7 Conservation Management Policy for further information.</p>
		<p>Section 2.5 - Methodology</p>	
		<p><i>Statutory obligations</i></p> <p>Under the EPBC Act, a HMP for a National Heritage listed place must be compliant with the Environment Protection and Biodiversity Conservation Regulations 2003 Schedule 5A – Management Plans for National Heritage Places and Schedule 5B – National Heritage Management Principles. The methodology in the HMP incorrectly references this as ‘Schedule 5A of the Environment Protection and Biodiversity Conservation Regulations (Aus) 2000: ‘Management Plans for Commonwealth Heritage Places’. The Commonwealth Heritage List is a separate list on which Adelaide Park Lands and City Layout is not included. To ensure compliance with the EPBC Act, and to assist the City of Adelaide in ensuring National Heritage values are not significantly impacted, it is important that the HMP references the correct statutory obligations and seeks to fulfill them within the HMP.</p>	<p>Delete entire para – It is also guided Implementation plan.</p> <p>Insert new para – The HMP complies with the Environment Protection and Biodiversity Conservation Regulations 2003 Schedule 5A – Management Plans for National Heritage Places and Schedule 5B – National Heritage Management Principles.</p> <p>Refer to Chapter 2, Section 2.6 – Methodology (page 14).</p>

	Stakeholder	Summary of Submission	Response
		<p><i>First Nations heritage</i></p> <p>Under this section the author has referenced seeking guidance from the publication <i>Ask First – A Guide to Respecting Indigenous Heritage Places and Values</i> prepared by the Australia Heritage Commission. This document was published in 2002 and more recent publications have been released on best practice engagement with First Nations peoples regarding their heritage. The department recommends reviewing the following documents for a more contemporary understanding of First Nations heritage:</p> <ol style="list-style-type: none"> 1) <u><i>Dhawura Ngilan: A vision for Aboriginal and Torres Strait Islander heritage in Australia</i></u>. Heritage Chairs of Australia and New Zealand, 2020. 2) <u><i>Partnering with Indigenous organisations for a sustainable environment: Guidance for non-Indigenous organisations seeking to build effective and respectful partnerships with Indigenous organisations and communities</i></u>. Australian Government, Department of the Environment and Energy, 2019. 3) <u><i>Engage Early: Guidance for proponents on best practice Indigenous engagement for environmental assessments under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i></u>. Australian Government, Department of the Environment, 2016 	<p>Delete sentence – The document ... Commission.</p> <p>Insert the following new para –</p> <p>The document was also prepared in light on the following First Nations heritage publications: <u><i>Dhawura Ngilan: A vision for Aboriginal and Torres Strait Islander heritage in Australia</i></u>. Heritage Chairs of Australia and New Zealand, 2020; <u><i>Partnering with Indigenous organisations for a sustainable environment: Guidance for non-Indigenous organisations seeking to build effective and respectful partnerships with Indigenous organisations and communities</i></u>. Australian Government, Department of the Environment and Energy, 2019; and <u><i>Engage Early: Guidance for proponents on best practice Indigenous engagement for environmental assessments under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i></u>. Australian Government, Department of the Environment, 2016.</p> <p>Refer to Chapter 2, Section 2.6 – Methodology, page 14.</p>
		<p>Section 2.5.1 – Consultation and Process</p> <p>The list of internal and key stakeholders does not include representatives from the Kurna nation. In producing the HMP did the authors consult with the Kurna nation as the traditional owners of the land on which Adelaide Park Lands and City Layout is located? If so, they should be included. If not, the authors should seek to consult directly with the Kurna nation in line with National Heritage Management Principle 6: <i>Indigenous people are the primary source of information on the value of their</i></p>	<p>The CoA has consulted with and invited feedback from KYAC and the draft National HMP was presented and workshopped with the Reconciliation Committee.</p> <p>Include aspirational management procedures and Policies. Indicate current level of consultation City of Adelaide is undertaking and future consultation goals.</p> <p>Refer new Policies below.</p>

	Stakeholder	Summary of Submission	Response
		<p><i>heritage and that the active participation of indigenous people in identification, assessment and management is integral to the effective protection of indigenous heritage values.</i></p>	
		<p>Chapter 5 – Heritage Significance</p> <p><i>Matters of National Environmental Significance</i></p> <p>Under the EPBC Act an action will require approval from the Australian Government Environment Minister if the action has, will have, or is likely to have, a significant impact on a matter of national environmental significance. There are nine 'matters' of significance, one of which is National Heritage. As this applies to Adelaide Park Lands and City Layout it is important that this information is clear within the HMP. The references to Matters of National Environmental Significance (MNES) throughout Chapter 5 need revision to ensure they are accurately represented otherwise the HMP risks providing confusing information to decision makers, particularly regarding changes, developments, and the need to refer actions. Further information is available online: Matters of National Environmental Significance: Significant Impact Guidelines 1.1 (dcceew.gov.au).</p>	<p>Include the following section within the HMP to provide explanation regarding National Environmental Significance:</p> <p>5.2.3 National environmental significance (NES)</p> <p>Under the EPBC Act an action will require approval from the Australian Government Environment Minister if the action has, will have, or is likely to have, a significant impact on a matter of national environmental significance. There are nine 'matters' of significance, one of which is National Heritage. A search has been undertaken to identify the other if there are any matters of national environmental significance or other matters protected by the Environment Protection and Biodiversity Conservation Act 1999 in the area namely the Local Government Area of the City of Adelaide. A copy is included in the Appendix. Further information is available online: Matters of National Environmental Significance: Significant Impact Guidelines 1.1 (dcceew.gov.au)</p> <p>Refer to Chapter 5, Section 5.2.3 - National environmental significance (page 140)</p>
		<p><i>National Heritage listing</i></p> <p>Whilst referring to the National Heritage significance of Adelaide Park Lands and City Layout there is reference to the 'Indigenous Heritage Register' (5.1 and 5.2.4). This is not a Commonwealth register and should not be included in this section as it does not apply to the National Heritage listing and should instead be included under State heritage significance.</p> <p>Section 5.2.5 references the use of the South Australian list of Threatened Species of Flora and Fauna. This too</p>	<p>Note that the Commonwealth List of Threatened Species of Flora and Fauna is referred to in the NES section and referenced to the Appendix.</p> <p>Move 5.2.4 Indigenous Heritage Register to new 5.3.4 in the section 5.3 State and Local Heritage Values.</p> <p>Refer Chapter 5, 5.3.3 Register of Aboriginal Sites and Objects (page 169)</p> <p>Move 5.2.5 List of Threatened Species of Flora and Fauna to new 5.3.4 in the section 5.3 State and Local Heritage Values.</p> <p>Refer Chapter 5, 5.3.4 - List of Threatened Species of Flora and Fauna (page 169)</p>

	Stakeholder	Summary of Submission	Response
		<p>should be included under the State not National Heritage information.</p> <p>The Commonwealth also maintains a list of Threatened Species of Flora and Fauna, and we recommend referencing the Commonwealth list of Threatened Species for the National Heritage values and the South Australia list for the State Heritage listing.</p>	
		<p>Chapter 6 – Opportunities & Constraints</p>	
		<p>Section 6.21- recommend highlighting that the reason Adelaide Park Lands and City Layout is protected under the EPBC Act is because it is included in the National Heritage list for outstanding value to the nation – as opposed to because of where it is located or who the place manager is.</p>	<p>Include the following sentence within the introductory sentence in Section 6.2.1 and outline that the Adelaide Park Lands and City Layout have been included on the National Heritage list because of its outstanding value:</p> <p>The Adelaide Park Lands and City Layout is included in the National Heritage list for outstanding value to the nation and is protected under the Commonwealth EPBC Act 1999. Approval is required under the EPBC Act for any ‘action’ occurring within, or outside, the Adelaide Park Lands and City Layout that has, will have, or is likely to have a significant impact on its National Heritage values.</p> <p>Refer to Chapter 6, Section 6.2.1 - Environment Protection and Biodiversity Conservation (EPBC) Act 1999 (Cth) (page 179)</p>
		<p>Recommend expanding on end of Section 6.2.1 on what the Minister for the Environment is making a decision about. The Minister’s decision is for approval for the action to proceed, and the Minister may choose not to approve an action. You may choose to also note that there are penalties for individuals and/or organisations who do not refer actions to the Minister for the Environment that may have a significant impact on Matters of National Environmental Significance.</p>	<p>Amend Chapter 6 to provide further information about the Minister’s decision making.</p> <p>Revise sentence within section 6.2.1.as follows:</p> <p>If so, that action must be referred to the Minister of the Environment for a decision. The Minister may decide to approve the action to proceed or may choose not to approve the action. It is important to note that there are penalties for individuals and/or organisations who do not refer actions to the Minister for the Environment that may have a significant impact on Matters of National Environmental Significance.</p> <p>Refer to Chapter 6, Section 6.2.1 - Environment Protection and Biodiversity Conservation (EPBC) Act 1999 (Cth) (page 179).</p>
		<p>We would also recommend removing the link in the HMP as this relates to all areas of managing a National Heritage place and instead replace it with a link specific</p>	<p>Revise Chapter 6, page 2 as follows:</p> <p>Remove link within section 6.2.2 Instigating a referral and insert the following new link:</p>

Recommendation 1 - Item 7.1 - Attachment A

	Stakeholder	Summary of Submission	Response
		to guidance on approvals: Referrals under the EPBC Act - DCCEEW	Referrals under the EPBC Act - DCCEEW Refer to Chapter 6, Section 6.2.2 – Instigating a Referral (page 179).
		<i>Definitions</i> In Section 7.2 the words listed under ‘Definitions’ have been used frequently throughout the HMP with the same meaning as intended in this chapter. If using a list of definitions for frequently used words, recommend placing this at the start of the HMP.	Relocate Section 7.2 - Definitions to Chapter 2 in place of 2.6 and renumber sections within Chapter 2 accordingly. Refer to Chapter 2, Section 2.7 – Definitions (page 15).
		<i>Compliance table</i> Recommend including a compliance table in this chapter that highlights which policy comply with Schedule 5A and Schedule 5B of the EPBC Regulations 2003. This ensures you are following best heritage practice, but also allows for ease of reviewing and updating the HMP in five years.	Include “EPBC Act 1999 and Regulations 2003 Compliance Table” after 7.4.1 Policy and Recommendation Table. Refer to Chapter 7, Section 7.5 – Compliance Table (page 180)
		<i>Policy recommendations</i> Policies 2.5 and 3.4 are the same lead policy. Each policy should identify a different issue and as such should not be duplicated.	Delete 3.4. and 3.4.1 (duplicates) Retain 2.5 (now policy 1.5). Refer to Chapter 7, Section 7.4.1 – Policy and Recommendation Table (page 201).
		Recommend specifying in policies whether heritage values being referenced are at a National, State or Local level.	Amend policies to reflect heritage values. Revise Chapter, Section 7.4.1 – Policy and Recommendation Table to ensure that the heritage values are referenced at National, State or Local level. Refer to Chapter 7, Section 7.4.1 – Policy and Recommendation Table (pages 200 – 212).
		Recommend including a policy regarding pursuing a more strategic approach to protection of the Park Lands in the future to address cumulative impacts.	Add new Policy and Recommendation within Chapter 7 as follows: Policy 2.7 - Protect the Park Lands from future potential cumulative impacts of land use. Recommendation 2.7.1 - Reduce potential cumulative impacts on the Park Lands by monitoring and evaluating changes in land use and implementing a holistic view of tracking any proposed changes. This HMP should act as a

	Stakeholder	Summary of Submission	Response
			<p>snapshot in time and provides a record of the state of the National Heritage values by which a comparison should be made with any future changes.</p> <p>Refer to Chapter 7 Section 2.41 – Policy and Recommendation Table (pages 202).</p>
		<p>Context</p> <p>It is best practice that the HMP for a place on the National Heritage list is not inconsistent with Schedule 5A (Management Plans for National Heritage Places) and Schedule 5B (National Heritage Management Principles) of the Environment Protection and Biodiversity Conservation Regulations 2003, as set out in the EPBC Act. The HMP is not currently consistent with Schedule 5A and 5B, therefore it is recommended that the following areas need to be strengthened and/or amended:</p>	<p>Amend to comply with Schedule 5A.</p> <p>Refer below.</p>
		<p><i>(e) describe the condition of the National Heritage values of the place</i> – this is partly satisfied as an assessment of the condition of the National Heritage values is spread throughout Chapters 4 and 6. Recommend including a summarized table of all the National Heritage values and their current condition. This acts as a reference for efficient decision making, and to review changes to the condition of the values.</p>	<p>Add the following to Chapter 5:</p> <p>Add in condition and integrity column (with ranking –poor, fair, good) to 5.2.5 - Attributes of National Heritage Value and include an explanatory comment covering useability.</p> <p>Refer to Chapter 5, Section 5.2.5 - Attributes of National Heritage Value (pages 142 – 156).</p>
		<p><i>(h) have policies to manage the National Heritage values of a place</i> - the following policies are not consistent with the EPBC Act:</p> <p><i>iii) the stakeholder and community consultation and liaison arrangements</i> - There is no policy on stakeholder and community consultation and liaison arrangements.</p> <p>Policy 7.8.1 states community will be involved in CLMP review process, however community and stakeholders should be consulted on any significant changes to policy and/or management.</p>	<p>Insert new Policy to “7.4.1 Policy and Recommendations Table” and update numbering.</p> <p>Add new Policy 8.2 - Land managers will consult with relevant stakeholders, including community groups, on significant changes to management policy and proposed development affecting the Park Lands and City Layout. They will seek to actively consult prior to decisions directly impacting on the National Heritage values.</p> <p>Add new Recommendation 8.2.1 - Refer policy for implementation strategy.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations (page 211).</p>

	Stakeholder	Summary of Submission	Response
		<p><i>iv) the policies and protocols to ensure that Indigenous people participate in the management process – There needs to be a policy that specifically highlights how the Kurna community will be able to participate in the management process of Adelaide Park Lands and City Layout.</i></p>	<p>Insert new Policy and Recommendation to “7.4.1 Policy and Recommendations Table” under “Community and Stakeholder Engagement”.</p> <p>Insert new Policy.</p> <p>Add new Policy 8.3 - Appropriate opportunities will be provided for Aboriginal people to be consulted on and involved in the management of their cultural heritage places and values, including intangible aspects.</p> <p>Insert the following new Recommendations:</p> <p>8.3.1 - Ensure that the City of Adelaide’s Reconciliation Committee is regularly updated and consulted on changes and actions which may impact on Aboriginal cultural values in the Park Lands and City Layout to ensure the Kurna people are involved in the ongoing management of the Adelaide Park Lands and City Layout.</p> <p>8.3.2 - Maintain a permanent role for a Kurna representative on the Kadaltilla/ Adelaide Park Lands Authority to ensure the Kurna people are involved in the ongoing management of the Adelaide Park Lands and City Layout.</p> <p>8.3.3 - Engage people with relevant expertise and experience in consultation to develop processes that ensure meaningful and effective engagement with the Kurna people.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 212).</p>
		<p><i>v) the protocols for the management of sensitive information - There is a policy for sensitive and confidential First Nations heritage values and places located in the area, but this is insufficient to manage such a large place. Recommend separate policies for sensitive information regarding First Nations peoples and a policy for sensitive information relating to the management of Adelaide Park Lands and City Layout by the City of Adelaide.</i></p>	<p>Insert following new Policy and recommendation within Section 7.4.1:</p> <p>Policy 9.2 - In consultation with the Kurna people, seek cultural consent and recognise the Indigenous Cultural and Intellectual Property protocol to appropriately manage sensitive or confidential information about Aboriginal Heritage values and places.</p> <p>Recommendation 9.2.1 - Ensure that protocols are in place to appropriately manage sensitive or confidential Aboriginal information.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 212).</p>
		<p><i>vi) the planning and management of works, development, adaptive reuse and property divestment proposals – There are policies relating to development.</i></p>	<p>Insert the following new Policies and Recommendations:</p> <p>Policy 3.12 - Adaptive reuse of heritage places is encouraged and preferred over the development of new buildings and sites.</p>

	Stakeholder	Summary of Submission	Response
		<p>However, there are no specific policies for adaptive reuse and property divestments.</p>	<p>Recommendation 3.12.1 - Encourage opportunities for adaptive reuse of heritage places in preference to new development.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 206).</p>
		<p><i>vii) how unforeseen discoveries or disturbances of heritage are to be managed</i> – Section 6.2.5 highlights the processes for historical archaeology under the Heritage Places Act (1993) (SA) but a specific policy is needed to advise decision makers on unforeseen discoveries or disturbances of heritage.</p>	<p>Include specific policy on unforeseen discoveries or disturbances of heritage.</p> <p>Include the following new Policies and Recommendations within Chapter 7:</p> <p>Policy 3.13 - Historical archaeological remains in the Park Lands and City Square are protected in accordance with the Heritage Places Act 1993 and its guidelines.</p> <p>Recommendation 3.13.1 - Where there is reasonable suspicion that archaeological artefacts could be present, a risk assessment is carried out in the planning of development proposals and earth works, in accordance with the Archaeological Provisions Guideline published by the Department of Environment & Water.</p> <p>Recommendation 3.13.2 - In the event of an unforeseen discovery of historical archaeological remains, work should immediately cease in the area and the discovery reported to Heritage SA, for advice, prior to continuing work. Heritage SA will determine if a permit may be required under Section 27 of the Heritage Places Act and what actions are required by the applicant to attain a permit. Works must not re-start in the area until confirmation is received from State Government’s DEW.</p> <p>Policy 4.2 - Conserve and manage Aboriginal sites and objects in the Park Lands area.</p> <p>Recommendation 4.2.1 - Ensure that prior to the preparation of development proposals, the potential for sub-surface deposits of Aboriginal cultural material is subject to archaeological assessment in consultation with the Kaurna people.</p> <p>Recommendation 4.2.2 - Ensure that works and maintenance service contracts include notice of the potential for unforeseen discovery of Aboriginal cultural heritage, including human remains, and the relevant statutory obligations and notification procedures if a discovery occurs. In addition, work with the Kaurna people and other relevant stakeholders to develop follow-up procedures, within the required statutory obligations, should a discovery be made. Refer also Implementation Strategy 7.5.2 for staff training provisions.</p>

	Stakeholder	Summary of Submission	Response
			<p>Recommendation 4.2.3 - In the event of an unforeseen discovery of an Aboriginal object, site or remains, work should immediately cease in the area and the discovery reported to the Aboriginal Heritage Branch of the Aboriginal Affairs Reconciliation Division (AARD) of the Attorney General's Department of, as required by Section 20(1) of the Aboriginal Heritage Act 1988 (SA), The Aboriginal Heritage Branch will advise on the appropriate process, which may include recording the site and further action under Sections 12 and/or 23 of the Act. Works must not re-start in the area until confirmation is received from AARD.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (pages 205 - 206).</p>
		<p><i>xi) the research, training and resources needed to improve management</i> – Policy 7.5 relates to understanding and complying with the EPBC Act, but the sub policies relate to training. Under (h) xi a policy is required that demonstrates what research, training and resources are needed to improve management. This should be a separate policy to a policy that ensures all people managing and making decisions regarding Adelaide Park Lands and City Layout are aware of their obligations under the EPBC Act.</p>	<p>Add in the following new Policy and recommendations within Chapter 7:</p> <p>Policy 7.5 - Ensure that the asset managers and lease holders of lands in Adelaide Park Lands and City Layout are aware of and comply with the obligations that arise from the protections under the EPBC Act.</p> <p>Recommendation 7.5.1 - New leases and licences granting use of lands in the Park Lands and service contracts include a description of the obligations and constraints that arise from the protections under the EPBC Act 1999.</p> <p>Recommendation 7.5.2 - Provide training opportunities for land managers and those responsible for maintenance in the Park Lands and City Squares in heritage management, including the requirements and obligations under the EPBC Act 1999, the identification of Aboriginal sites and objects, together with the preparation of a guide for their internal use to help facilitate this understanding.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (pages 210).</p>
		<p><i>(i) include an implementation plan</i> – Policy 7.4.1 states the need to develop a strategy for the implementation of the actions in the HMP. An implementation plan is a necessary element of a HMP to be compliant with the EPBC Act. Recommend that the next version of the HMP includes the implementation plan.</p>	<p>Implementation Plan to be included in the Policy and Actions Table.</p> <p>Revise Chapter 7 as follows:</p> <p>Add column to 7.4.1 Policy and Recommendations Table to the right of the "Actions" column. New column to be "Implementation - Responsibility".</p> <p>Add new column to the right of "Implementation -Responsibility". New column to be "Priority for Implementation" and add in High, Medium, or Low ranking for each Action.</p>

	Stakeholder	Summary of Submission	Response
			<p>Change existing “Priority” column to “Timeframe for Implementation”.</p> <p>Refer to Chapter 7, Section 7.4.1 (page 200).</p>
		<p><i>2. The management of National Heritage places should use the best available knowledge, skills and standards for those places, and include ongoing technical and community input to decisions and actions that may have a significant impact on their National Heritage values.</i></p> <p>The HMP does not comply with this management principle as there needs to be further involvement of the Kurna community and further evidence of ongoing technical and community input into decisions and actions that may have a significant impact on Adelaide Park Lands and City Layout. This can be addressed through specific policies.</p>	<p>Insert the following policies and recommendations within Chapter 7, Section 7.4.1:</p> <p>Policy 8.3 - Appropriate opportunities will be provided for Aboriginal people to be consulted on and involved in the management of their cultural heritage places and values, including intangible aspects.</p> <p>Recommendation 8.3.1 - Ensure that the City of Adelaide’s Reconciliation Committee is regularly updated and consulted on changes and actions which may impact on Aboriginal cultural values in the Park Lands and City Layout to ensure the Kurna people are involved in the ongoing management of the Adelaide Park Lands and City Layout.</p> <p>Recommendation 8.3.2 - Maintain a permanent role for a Kurna representative on the Kadaltilla/ Adelaide Park Lands Authority to ensure the Kurna people are involved in the ongoing management of the Adelaide Park Lands and City Layout</p> <p>8.3.3 Engage people with relevant expertise and experience in consultation to develop processes that ensure meaningful and effective engagement with the Kurna people.</p> <p>Refer to Chapter 7, Section 7.4.1 (page 211).</p>
		<p><i>3. The management of National Heritage places should respect all heritage values of the place and seek to integrate, where appropriate, any Commonwealth, State, Territory and local government responsibilities for those places.</i></p> <p>Compliance with this management principle could be strengthened through greater clarity around the responsibilities of the Commonwealth and the State in managing National Heritage places. Recommendations in the ‘General feedback’ seek to assist with strengthening the HMP under this management principle.</p>	<p>Insert the following policies and recommendations within Chapter 7:</p> <p>Policy 6.10 – Form a Conservation Agreement under the EPBC Act between the Commonwealth Minister for the Environment and the South Australian state government, in consultation with Kadaltilla / Adelaide Park Lands Authority, to protect the National heritage values of the Adelaide Park Lands and City Layout. The agreement should describe an appropriate level of development in the Park Lands as well as in adjacent previously alienated areas of Park Land</p> <p>Recommendation 6.10.1 – Engage an expert consultant to facilitate and establish a Conservation Agreement under the EPBC Act between the Commonwealth Minister for the Environment and the South Australian state government, in consultation with Kadaltilla / Adelaide Park Lands Authority and other relevant stakeholders with the purpose of defining acceptable levels of development within and adjacent to the Park Lands.</p>

	Stakeholder	Summary of Submission	Response
			Refer to Chapter 7, Section 7.4.1 (page 210).
		<p><i>5. The management of National Heritage places should make timely and appropriate provisions for community involvement, especially people who:</i></p> <p><i>a) have a particular interest in, or associations with, the place; and</i></p> <p><i>b) may be affected by the management of the place.</i></p> <p>Compliance with this management principle could be strengthened by increased policies relating to community involvement under Policy 7.8. For example, what can the City of Adelaide do to involve communities that have a particular interest in or may be affected by their management of Adelaide Park Lands and City Layout?</p>	<p>Include the following new set of policies and recommendations within 7.4.1 Policy & Recommendations Table to manage Community and Stakeholder Engagement, including:</p> <p>Policy 7.5 - Ensure that the asset managers and lease holders of lands in Adelaide Park Lands and City Layout are aware of and comply with the obligations that arise from the protections under the EPBC Act.</p> <p>Recommendation 7.5.1 - New leases and licences granting use of lands in the Park Lands and service contracts include a description of the obligations and constraints that arise from the protections under the EPBC Act 1999.</p> <p>Recommendation 7.5.2 - Provide training opportunities for land managers and those responsible for maintenance in the Park Lands and City Squares in heritage management, including the requirements and obligations under the EPBC Act 1999, the identification of Aboriginal sites and objects, together with the preparation of a guide for their internal use to help facilitate this understanding.</p> <p>Policy 8.2 - Land managers will consult with relevant stakeholders, including community groups, on significant changes to management policy and proposed development affecting the Park Lands and City Layout. They will seek to actively consult prior to decisions directly impacting on the National Heritage values.</p> <p>Policy 8.3 - Appropriate opportunities will be provided for Aboriginal people to be consulted on and involved in the management of their cultural heritage places and values, including intangible aspects.</p> <p>Policy 8.4 - Land managers of the Adelaide Park Lands and City Layout will maintain regular contact with DCCEEW, including informal consultations where appropriate, and formally refer any action that potentially impacts on any heritage values or places as required by the EPBC Act.</p> <p>Recommendation 8.4.1 - Establish a communications policy and timeframe and format for regular consultations with DCCEEW.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (pages 210, 211, 212).</p>
		<p><i>6. Indigenous people are the primary source of information on the value of their heritage and that the active participation of indigenous people in identification,</i></p>	<p>Refer to Schedule 5A Item h (iv) for new management Policy.</p> <p>Refer to Schedule 5B Item 2 for new consultation Policy.</p>

Recommendation 1 - Item 7.1 - Attachment A

	Stakeholder	Summary of Submission	Response
		<p><i>assessment and management is integral to the effective protection of indigenous heritage values.</i></p> <p>The HMP is not compliant with this management principle. A policy is required on Kurna nation representation and involvement in the management of Adelaide Park Lands and City Layout. A policy is also recommended on increased consultation with the Kurna nation on the HMP.</p>	<p>Refer to Chapter 7, Section 7.51 - EPBC Act 1999 and Regulations 2003 Compliance Table (pages 214, 215).</p>

State Government			
	Stakeholder	Summary of Submission	Response
2	Green Adelaide Dept of Environment and Water	Generally supportive of the HMP.	No change requested.
		Concerned about the lack of policies or actions regarding:	
		<ul style="list-style-type: none"> Maintaining or enhancing the biodiversity value of the Park Lands. Recommend inclusion of actions for the development of a management plan to improve biodiverse plantings through revegetation to enhance habitat and resources and conserve the biodiversity value of the Park Lands. This would not only help acknowledge the vegetation and biodiversity value of the Park Lands prior to European settlement, it would also acknowledge the current role the Park Lands play to support ecological processes. 	<p>Although the HMP supports the Adelaide Park Lands contribution to biodiversity, biodiversity is not a National Heritage Value and is comprehensively addressed in other CoA strategies and management plans for the Adelaide Park Lands.</p> <p>This use and value have developed over time and may change without affecting the National Values.</p>
		<ul style="list-style-type: none"> Include additional action in 3.1 regarding conservation of biodiverse Park Lands landscape character including areas for native vegetation or revegetation. 	"As Above"
		<ul style="list-style-type: none"> Urban Watercourse Management Program occurring upstream meaning timeframes for action 5.2.4 (Chapter 7) may need to be amended, 	<p>Revise wording to support water quality improvements:</p> <p>Policy 5.1.3 - Continue to monitor and manage the water quality of Karrawirra Parri / River Torrens and other water ways within the Park Lands to enable continued use for recreational activities and support biodiversity.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 207).</p>
		<ul style="list-style-type: none"> Recommend that the 'conservation' policies and actions be prioritised, particularly those related to: <ul style="list-style-type: none"> Karrawirra Parri / River Torrens, and conserving the diverse landscape character of the Park Lands including native plantings. 	<p>Included within Chapter 7 Section 7.4.1 - Policy and Recommendations Table Recommendation 3.11.</p> <p>Refer to Chapter 7 Section 7.4.1 - Policy and Recommendations Table, Recommendation 3.11 (page 202).</p>
<ul style="list-style-type: none"> Update 6.2.8 to reflect Green Adelaide's Vision around WSUD and green urban infrastructure. 	Noted. Green Adelaide's Vision Statement regarding WSUD has been acknowledged in Chapter 6, Section 6.2.12.		

			Refer to Chapter 6, Section 6.2.12 (page 185).
3	Heritage SA Dept of Environment and Water	The Conservation Policy focuses on the historic value of the landscape plans of Brown (1880) and Pelzer, proposing these be retained or reinstated through the Park Lands. The National Heritage values do not focus on this value – they encapsulate the plan and Park Lands as a creative planned work; as a facilitator of concentrated, systematic settlement and as an ongoing public open space for recreation. Focusing policy on an 1880s park plan seems contrary to these values and will limit the future use and social importance of the place for the community. Further, the remnant 1880s planned parks would not be of National Heritage Value.	<p>The values statement under criteria (f), refers directly to designed nineteenth century landscapes, including use of specimen trees. Surviving elements are proposed retained, not restored nor reconstructed.</p> <p>Brown is only one of the successive landscape designers who worked for the City of Adelaide.</p> <p>Revise and add the following policies and recommendations within Section 7.4.1:</p> <p>Policy 3.3 - Undertake further research to understand the high integrity and intact remnant historic designed landscapes of successive landscape designers.</p> <p>Recommendation 3.3.1 - Undertake further research to understand the high integrity and intact nineteenth century to present day remnant underlying plantings, spatial structure and vistas developed in the Park Lands. Plantings identified in poor condition in Opportunities, Constraints and Key Issues are assessed as a priority.</p> <p>Recommendation 3.3.2 - Maintain reference to the National Heritage Values in the Adelaide Park Lands Community Land Management Plan to recognise the cultural significance of the high integrity and intact nineteenth century to present day spatial designs where these are best represented in the Park Lands. Future revegetation zones should be planned to conserve the integrity of the spatial design and visual intent.</p> <p>Refer to Chapter 7 Section 7.4.1 - Policy and Recommendations Table (page 203).</p>
		The HMP proposes that Heritage SA and DEW review and support this document – while it is appropriate for these organisations to ‘review’ the document Heritage SA (DEW) does not agree that they should ‘support’ it.	Delete Policy 7.1.2 within Chapter 7, Section 7.4.1.
		Heritage SA supports the principles and intent of the HMP but has concerns with the direction of some Conservation Policy where it could constrain development based on matters beyond National values. The table below provides more detail on some of these concerns.	
		The HMP references the future listing of the Park Lands and City Layout as a State Heritage Area, references to this should be removed from current, short-term recommendations.	Noted. As the State Heritage Area Overlay would add another layer of protection consistent with the national Heritage Listing values it is important the HMP supports any future Heritage Overlay for the Adelaide Park Lands and City Layout and therefore 7.1.4 (Chapter 7) should be revised to reflect this.

Recommendation 1 - Item 7.1 - Attachment A

			<p>Revise 7.1.4 (Chapter 7) to support a State Heritage Area Overlay for the Adelaide Park Lands and City Layout.</p> <p>Policy 7.1.3 - Support the creation of an Adelaide Park Lands and City Layout State Heritage Area Overlay for the Adelaide Park Lands and City Layout.</p> <p>Refer to Chapter 7 Section 7.4.1 - Policy and Recommendations Table (page 208).</p>
		<p>The HMP discusses the values inherent in views/vistas associated with the Adelaide Plan. It is recommended that this discussion be qualified, as it is unclear whether Light’s design decisions included consideration of views/vistas – they may be consequential, rather than intentional.</p>	<p>Designed views/vistas are mentioned in the National Values under Criteria (f). Agree that there is no record that Light considered views and vistas in formulating his design, other later speculation that the stepped nature of portions of the city layout may have been partially informed by advantage views to the Park Lands. Views and vistas within the Park Lands and City Layout have developed over time because of the overlay of subsequent designers and by consequence of greater city density.</p> <p>Revise wording around views/vistas to qualify/clarify policy.</p> <p>Revise comments for views and vistas attributes within Chapter 5, Section 5.2.5 page 149 as follows:</p> <p>Views and vistas of the city and within the city were unlikely to be intentionally designed by Light, and were more likely <u>consequential and</u> evolved. Later landscape designers intentionally created views and vistas through planting (i.e. Pelzer’s Cross of Sacrifice in the eastern part of Pennington Gardens). <u>Thus, both consequential and intentional</u> views and vistas developed over time in the contemporary city and holds increasing importance nowadays.</p> <p>Refer to Chapter 5, Section 5.2.5 (page 149)</p> <p>Revise Chapter 6, Section 6.4.4 page 188 as follows: Views and vistas were <u>consequential and</u> were not a consideration in Light’s planning of the city layout and have developed over time as the form of the city evolved. ...</p> <p><u>Many successive landscape designers intentionally designed views and vistas within the Park Lands such as Schomburgk, Brown, and Pelzer.</u> In the Park Lands, John Ednie Brown’s master plan intended gardenesque scenes including winding and treed pleasure ways and picturesque views to stands of specimen trees framed in open spaces. Many of these are still evident in less developed parts of the Park Lands, although many are obscured by later revegetation efforts. There is an opportunity to further understand <u>restore the remnant</u> historic nineteenth <u>and twentieth century landscape design scenes and potentially incorporate it through</u> by careful future planning of revegetation <u>to conserve the space</u> around early tree groupings, and through a replacement program.</p> <p>Refer Chapter 6, Section 6.4.4 (page 188)</p>

			<p>Revise Chapter 7, Section 7.4.1 page 202 as follows:</p> <p>Consider <u>consequential and intentional</u> views and vistas when planning new work and plantings within the Park Lands. Views and vistas within the Park Lands were developed to the design of John Ednie Brown and August Pelzer in which the Parks were structured around ‘Gardenesque’ scenes and included views to the Mt Lofty Ranges, views from Terraces to the Park Lands, treed ways and stands of specimen trees as featured highlights within large open spaces surrounded by perimeter planting within the Park Lands.</p> <p>Refer to Chapter 7, Section 7.4.1 page 202</p>
		<p>Conservation policy identifies that alienated Park Land be returned where possible, or at least ‘swapped’ where new development occurs. Discussion reinforcing why this is important would assist in this argument.</p>	<p>The integrity of the original Colonel Light Plan includes the portions previously designated Park Lands and subsequently alienated for various purposes. Returning alienated Park Lands will assist with the interpretability of the original layout. As an interim solution swapping portions so that no further net loss occurs, in a sense maintains the status quo.</p> <p>Expand discussion on benefits of reclaiming Park Lands.</p>
		<p>Any time the document refers to heritage values it should be prefaced with ‘national’ to differentiate between any future State or local heritage values associated with the Park Lands and City Layout.</p>	<p>Make revisions throughout the HMP to differentiate ‘National’ values from state and local heritage values.</p>
		<p>1.1 Background</p> <p>Second paragraph – Heritage SA may/ may not use this as a tool for development assessment referrals – would only relate to SHP listings at present.</p>	<p>Revise fourth paragraph from ‘It will...’ to ‘It is intended to be used...’</p> <p>Refer to Chapter 2 Section 2.1 – Background (page 9)</p>
		<p>1.2 Recommendations</p> <ul style="list-style-type: none"> • Dot point 4 – next 12 months – primary focus for conservation/ reinstatement is Brown’s 1880 Master Plan. <p>The HMP focuses on the historic value of garden designs and layouts, since 1837, but particularly 1880. The Statement of Significance for the place does not focus on this – it is simply the design and layout of the city/ park lands, retained open space for public use. Focusing on a particular planting/ design period, many years after the establishment of the Park Lands, sets the area in a specific time, unrelated to the period of significance of the place.</p>	<p>The values statement under criteria (f), refers directly to designed nineteenth century landscapes, including use of specimen trees. Surviving elements are proposed retained and conserved, not reconstructed. This does not constrain changes or other values being developed.</p> <p>Minor refinement of polices in Chapter 7 section 7.4.1 (pages 200 – 212)</p>

Recommendation 1 - Item 7.1 - Attachment A

	<ul style="list-style-type: none"> • Dot point 8 – next 12 months – Heritage SA and DEW can review, encourage, but not support/ adopt – as per comments in first row above. 	Delete dot point 8 in Chapter 1
	<p>Chapter 5 – Heritage Significance</p> <ul style="list-style-type: none"> • The Statement of Significance for the proposed State listing as a State Heritage Area is incorrect, the South Australian Heritage Council approved an updated Statement of Significance for the Adelaide Park Lands and City Layout at its meeting 7 April 2022, with further changes approved 11 April 2022. The updated Statement is provided in Attachment 2. 	<p>Update Section 5.4.1 to refer to most current statement dated 11 April 2022 as supplied by Heritage SA.</p> <p>Refer to Chapter 5, Section 5.4.1 (page 170)</p>
	<ul style="list-style-type: none"> • Chapter content sets expectations not in alignment with much of what is included in chapter 7. 	<p>Chapter 7 conservation policies protect the places of heritage significance identified in Chapter 5.</p> <p>Refer to Chapter 7, Section 7.4.1 (pages 200 – 215)</p>
	<ul style="list-style-type: none"> • Under (f) – para 3 – is the ‘landscape planting design’ of outstanding heritage value to the nation? This suggests that the design schemes/ layouts were typical to the period and commonly found in many large gardens/ parks in Australia. This paragraph sets the focus for the conservation of all 1880+ park designs and may not be a robust argument (same for ‘attributes of heritage value’ section). 	<p>The HMP is guided by the criteria statements and national values statement. This is the Commonwealth assessment of the place’s values and not able to be revised by the consultant.</p> <p>Section 5.2.1 is extracted from the official values of the listing.</p> <p>Minor refinement of policies in Chapter 7.</p> <p>Refer to Chapter 7, Section 7.4.1 (pages 200 – 215)</p>
	<ul style="list-style-type: none"> • Statements of Cultural Significance – Individual Parks – need to make it clear here that these statements have no statutory standing, nor are they endorsed by the South Australian Heritage Council. 	<p>Revise title of section 5.4 to note ‘Non-Legislative’ Values Statements.</p> <p>Refer to Chapter 5, Section 5.4 (page 170)</p>
	<ul style="list-style-type: none"> • 5.2.7 - The heritage assessment includes a list of ‘elements of heritage value’. A more comprehensive list of ‘intrusive’ elements would also assist understanding, with reasons why the elements are intrusive. A list of intrusive elements would be useful, to support the arguments for Conservation Policy. 	<p>Include a comprehensive list of intrusive elements.</p> <p>Refer to Chapter 6, Section 6.4.3 (page 187)</p>

	Chapter 6 - Opportunities and Constraints	
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		<ul style="list-style-type: none"> • 6.2.5 – State Heritage Areas – a Heritage Standard is not considered a Conservation Plan. 	<p>Delete reference to Conservation Plan.</p> <p>Refer to Chapter 6, Section 6.2.7 (page 181)</p>
		<ul style="list-style-type: none"> • 6.2.5 – State Heritage Places – 2nd paragraph – this is triggered by the PDI Regulations and Planning and Design Code, not the Heritage Places Act – definition of development (PDI Act) and referral processes (Schedule 9 under PDI Regs) – suggest making this clearer or move to PDI Act section. 	<p>Move section on PDI Act to Section 6.2.9</p> <p>Refer to Chapter 6, Section 6.2.9 -Planning, Development and Infrastructure Act 2016 (page 183)</p>
		<p>Chapter 7 - Conservation Management Policy</p>	
		<ul style="list-style-type: none"> • 2.3 – define areas ‘alienated’ so these are separate from built areas of cultural heritage value. 	<p>Noted. Further context added around ‘alienated’ lands.</p> <p>Revise Policy 2.3 within Section 7.4.1 as follows:</p> <p>Policy 2.3 - Restore previously alienated land <u>which is not of State or Local Heritage value in the Park Lands</u> when the opportunity arises.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 201)</p>
		<ul style="list-style-type: none"> • 3.1.3 – It is not known if Light considered views/ vistas as part of his design of the city layout – so this is not a heritage issue – it may be a landscape issue though, as values have emerged over time – should be developed further in ‘views’ section of HMP. 	<p>Addressed in Section 6.4.4. which identifies that views and vistas were not part of Light’s planning of the city and Park Land layout and have developed over time</p> <p>Refer to Chapter 6, Section 6.44 – Views and Vistas (page 188)</p>
		<ul style="list-style-type: none"> • 3.3.1 – <i>“Conserve remnant underlying spatial structure and vistas developed following JE Brown’s 1880 landscape master plan where this is represented in the Park Lands”</i> – <p>Integrity and intactness threshold needs to be determined to support this and evidence to demonstrate what aspects remain as at 2023.</p>	<p>The values statement under criteria (f), refers directly to designed nineteenth century landscapes, including use of specimen trees. Surviving elements are proposed to be retained and conserved, not reconstructed. This does not constrain changes or other values being developed.</p> <p>Minor refinement of policies in Chapter 7.</p> <p>Revise Policy 3.3.1 - <u>Undertake further research to understand the high integrity and intact</u> Assess the nineteenth century and twentieth century to present day <u>remnant underlying plantings, spatial structure and vistas developed in the Park Lands.</u> Plantings identified in poor condition in Opportunities, Constraints and Key Issues are assessed as a priority.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 203)</p>
		<ul style="list-style-type: none"> • 3.3.2 – “Assess and conserve the 19th century plantings identified in poor condition in Opportunities, 	<p>“As Above”</p>

		<p>Constraints and Key Issues as a priority.” - Why are the 19th century plantings being given primacy over other plantings in the Park Lands?</p> <ul style="list-style-type: none"> ○ The National Statement of Significance states ‘The tree planting designed and implemented since the 1850s and the living plant collection of the Park Lands....’ <p>The Park Lands thus far reflect 187 years of use and thinking about landscape design and planting philosophies as identified by the Statement of Significance. While Brown’s 1880 plan is the first comprehensive landscape plan for the Park Lands, most of it wasn’t implemented until after Pelzer became the City Gardener in 1899. Consequently, the implementation of much of the 1880 plan took place in the first decades of the 20th century. The focus on the 1880 plan ignores other planting philosophies implemented in the Park Lands before and after the 1880 plan, this is not the intent of the National Statement of Significance, which very clearly states since 1850 and without end date. In conserving remnant landscape design/plan plantings those remnants should be able to demonstrate sufficient integrity and intactness to meet significance at the National threshold.</p>	<p>Section 3.3.2 does not suggest that other layers of planting are not important, rather that some nineteenth century plantings are in poor condition and their setting has been affected by later planting. Most later plantings are in good condition.</p>
		<ul style="list-style-type: none"> ● 3.3.3 - “Review Adelaide Park Lands CLMP to recognise cultural significance of the 19th century spatial designs where these are represented in the Park Lands. Future revegetation zones should be planned to conserve the integrity of the spatial design and visual intent.” – as above – integrity and intactness threshold needs to be devised to protect the areas that demonstrate significance at the national level. <p>The focus on 19th century plantings and 1880 master plan (largely implemented in the 20th century) could be viewed as a bid to reinstate the 1880 plan to the detriment of future open space uses, this does fit with the national statement in part. Only those areas that still demonstrate National values at threshold should be the focus of this statement (and clearly define what</p>	<p>The values statement under criteria (f), refers directly to designed nineteenth century landscapes, including use of specimen trees. Surviving elements are proposed retained and conserved, not reconstructed.</p> <p>Revise Policy 3.3.3 and change numbering as follows:</p> <p>Policy 3.3.2 – <u>Review the Adelaide Park lands CLMP Maintain reference to the National Heritage Values in the Adelaide Park Lands Community Land Management Plan to recognise the cultural significance of the high integrity and intact nineteenth and twentieth century to present day spatial designs</u> where these are best represented in the Park Lands. Future revegetation zones should be planned to conserve the integrity of the spatial design and visual intent.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 203)</p>

Recommendation 1 - Item 7.1 - Attachment A

		they are) so that management isn't used as a means to reinstate an 1880s master plan in areas where it has ceased to exist for decades thereby locking future South Australians into a 19th century concept of acceptable open space uses for leisure and recreation.	
		<ul style="list-style-type: none"> • 3.7 - This policy needs to be clearer – is it about removing buildings from the Park Lands or maintaining the 2023 balance of built form vs open space? Need (heritage) justification for the policy position. 	<p>Revise Policy 3.6 wording from 'Maintain the balance of the existing....' To 'Maintain a balance of building to..</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 204)</p>
		<ul style="list-style-type: none"> • 3.11 - As per previous comments – expand on what the 'intrusive elements' are. 	<p>Include a comprehensive list of intrusive elements in Section 6.4.3.</p> <p>Refer to Chapter 6, Section 6.4.3 – Intrusive Elements (page 187)</p>
		<p>7.1.2 and 7.1.3 -</p> <ul style="list-style-type: none"> • The HMP proposes that Heritage SA and DEW review and support this document – while it is appropriate for these organisations to 'review' the document Heritage SA (DEW) does not agree that they should 'support' it. 	<p>Delete 7.1.2.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 208)</p>
		<ul style="list-style-type: none"> • Concerned that the National Heritage Management Plan's focus on aspects not recently 'ground truthed' with thresholds for integrity and intactness clearly defined will result in hampering on-going uses of the Park Lands into the future as open space and a place for leisure and recreation. There are concerns that the National Heritage Management Plan as written may not enable a change in open space uses (for example vegetated park to playing field and vice versa). The Plan may make it difficult for the Adelaide City Council, who is responsible for managing and maintaining the Park Lands, to make decisions. Note: the State Heritage significance around landscape character doesn't give primacy to any particular period of time or designer – 'The association with and cultural significance of the Park Lands and squares has continued to evolve and has been reinforced by the myriad of ways South Australians use the public open space with its distinctive landscape character created by its parks and gardens, formal and informal sporting grounds and areas, and leisure and recreational 	<p>As above. the values statement under criteria (f), refers directly to designed nineteenth century landscapes, including use of specimen trees. Surviving elements are proposed retained and conserved, not reconstructed. It is not the intention of the plan to restrict change of use.</p> <p>Include in implementation strategy need to undertake further research to understand the high integrity and intact nineteenth century to present day remnant underlying plantings, spatial structure and vistas developed in the Park Lands</p>

		facilities.' See also Statement of Significance prepared for the proposed State Heritage Area in Attachment 2.	
		<ul style="list-style-type: none"> • 7.1.4 - Progress the creation of an Adelaide Park Lands and City Layout State Heritage Area as recommended by the South Australian Heritage Council – this is not within the remit of the HMP however, the plan could support the listing of the Park Lands and City Layout as a State Heritage Area in the Planning and Design Code by the Planning Minister. 	<p>Revise Recommendation 7.1.4 now 7.1.3 (Chapter 7) to support a State Heritage Area Overlay for the Adelaide Park Lands and City Layout.</p> <p>Recommendation 7.1.3 - <u>Progress Support</u> the creation of an Adelaide Park Lands and City Layout State Heritage Area Overlay for the Adelaide Park Lands and City Layout as recommended by the South Australian Heritage Council.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 208)</p>
4	Department of Infrastructure and Transport (SA)	Congratulated CoA on a well presented and highly ambitious HMP.	Comment does not request changes.
		Concerned the HMP supports State Heritage Area creation; this would create an additional legislative assessment on top of existing rigorous planning processes particularly for existing DIT operational / maintenance processes, street tree planting and road widening projects that would need to be able to continue under a similar arrangement to existing.	<p>The State Heritage Area Overlay is an important tool in the protection of the National Heritage Listing values as such Recommendation 7.1.4 (Chapter 7) is revised to support the Overlay.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 208)</p>
		Check document to ensure correct names of Aboriginal organisations and legislation.	Revise the HMP to include correct names of Aboriginal organisations and legislation are used.
		Recommended approval of references to Kaurna people burial sites by KYAC.	<p>Noted. These sites are publicly available through previous reports but agree to make these references more generic.</p> <p>Revise to obscure burial site locations.</p> <p>Refer to Chapter 4, Section 4.2.2 – Aboriginal Evidence (page 57)</p>
		<p>General Comment</p> <p>The Attorney-General's Department, Aboriginal Affairs and Reconciliation (AGD-AAR) have provided advice that the strong preference of the South Australian Aboriginal community is that the term "Aboriginal" is preferable to "Indigenous". Recommend this amendment is applied throughout the document.</p>	<p>Noted. The word Indigenous has only been used in the document when it is quoted from historic sources or in legislation. Will add [Aboriginal] where this occurs.</p> <p>Revise the HMP replace "indigenous" with Aboriginal or add "[Aboriginal]". The CoA also uses ' First Nations'.</p>
		<p>Contents page</p> <p>Include page numbers within contents page.</p>	<p>Add page numbers to contents page.</p> <p>Refer to Contents Page.</p>

		<p>1.2 - Recommendations (page 1)</p> <p>As the Park Lands include Aboriginal cultural and heritage values, the Department recommends the AGD-AAR is included as a key agency for review and seeking support, in addition to the agencies already mentioned; Heritage SA and the Department for Environment and Water.</p>	<p>Although AGD-ARR will be included in any future review, the recommendation is not required as part of this HMP.</p> <p>DEW and Heritage SA have requested removal of these recommendations.</p> <p>Delete recommendation for consistency across State Government agencies.</p> <p>Refer to Chapter 1, Section 1.2 – Recommendations (page 7)</p>
		<p>Recommendations (page 1) and 7.4.1 Policy and Actions Table (Action 7.1.4) (page 248)</p> <p>Notes the intention to progress the creation of an Adelaide Park Lands and City Layout State Heritage Area however is concerned the State Heritage Area listing may potentially add an additional legislative assessment and approval process on top of the existing Commonwealth legislative assessment and approval process. The Department’s operational and maintenance activities within a new Adelaide Park Lands and City Layout State Heritage Area would need to be able to continue under a similar arrangement to the exemptions in the Planning, Development and Infrastructure (General) Regulations 2017:</p> <ul style="list-style-type: none"> • Schedule 13 - State agency development exempt from approval, 5 - Certain development within the Park Lands, or • Schedule 5 - Exclusions from definition of development - State heritage areas, 2 - Council works. <p>Further, the Department is currently liaising with the Australian Government on a number of South Australian Government initiatives in the Parklands and would not support additional process on top of an already rigorous assessment process.</p>	<p>Revise Recommendation 7.1.4 now 7.1.3 (Chapter 7) to support a State Heritage Area Overlay for the Adelaide Park Lands and City Layout.</p> <p>Recommendation 7.1.3 - Progress Support the creation of an Adelaide Park Lands and City Layout State Heritage Area Overlay for the Adelaide Park Lands and City Layout as recommended by the South Australian Heritage Council.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 208)</p>
		<p>4.2.2 - Aboriginal Evidence (page 132)</p> <p>References to locations of Kaurna burial sites should be approved by the Kaurna Yerta Aboriginal Corporation (KYAC) Board to determine if they allow this information to be made publicly available. This is information that is protected by the Aboriginal Heritage Act 1988.</p>	<p>Noted. These sites are publicly available through previous reports but agree to make these references more generic.</p> <p>Revise to obscure burial site locations.</p> <p>Refer to Chapter 4, Section 4.2.2 – Aboriginal Evidence (page 57)</p>

		<p>5.2.4 - Indigenous Heritage Register</p> <p>Update the name of this section (and other references in the document) to reflect the correct name of the Register: Register of Aboriginal Sites and Objects</p>	<p>Change wording from 'Indigenous Heritage Register' to 'Register of Aboriginal Sites and Objects'.</p> <p>Refer to Chapter 4, Section 4.2.2 – Aboriginal Evidence (page 57)</p>
		<p>6.2.3 - Aboriginal Heritage Act 1988 (amended 2016) (page 226)</p> <p>Amend to include recent Machinery of Government changes; the Aboriginal Heritage Act 1988, is administered by the Attorney-General's Department, Aboriginal Affairs and Reconciliation.</p>	<p>Revise HMP to include administration Machinery of by the Attorney-General's Department, Aboriginal Affairs and Reconciliation.</p> <p>Refer to Chapter 2, Section 2.6.1 – Consultation and Process (page 14) and Chapter 6, Section 6.2.4 – Aboriginal Heritage Act 1988 (Version 1.1.2021) (page 181)</p>
		<p>6.2.4 - Native Title Act 1994 (page 226)</p> <p>Amend to Commonwealth Native Title Act 1993, or Native Title (South Australia) Act 1994.</p>	<p>Change of wording to <i>Commonwealth Native Title Act 1993, or Native Title (South Australia) Act 1994</i>.</p> <p>Refer to Chapter 6, Section 6.2.5 - Aboriginal Heritage Act 1988 (Version 1.1.2021) (page 181)</p>
		<p>6.3 - Aboriginal Heritage (page 232)</p> <p>The opportunities nominated in the Stretch Reconciliation Action Plan 1 July 2021 - 30 June 2024, are well considered and demonstrate practical ways to acknowledge Kurna connection to this area.</p>	<p>Reconciliation Plan has been addressed in Chapter 7.</p> <p>Refine policies in Chapter 7.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table Policy 4.1 and Recommendation 4.1.1 (page 206)</p>
		<p>7.4.1 - Policy and Actions Table (Action 2.2.2)</p> <p>Supports the proposed partnership with Green Adelaide to conserve and manage the Karrawirra Parri/River Torrens. The Department suggests that the strategies and policies developed through this partnership reflect the recreation and movement value of the area, in addition to the natural environment, water quality and biodiversity</p>	<p>Reference the need for wholistic management of the River Torrens as a river system.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Recommendation 2.2.2 (page 201)</p>
		<p>7.4.1 - Policy and Actions Table (Action 2.6) (page 244)</p> <p>Notes the intention to restrict new surface transport corridors (roads, train lines) and further widening of corridors in or through the Park Lands. The Department supports and acknowledges the national heritage values of the Park Lands, however, the Department would strongly recommend reframing this Action away from</p>	<p>Revise the wording but retain the intent of the policy as follows:</p> <p>Policy 2.6 – <u>Restriet Balance future infrastructure and transport needs such as new surface transport corridors (roads, train lines) and further widening of corridors in or through the Park Lands, with the protection of the National Heritage values while acknowledging that multi-lane roads are a major physical and visual intrusion on the Park Lands and reduce their connectivity.</u></p>

		specifically restricting new and widened transport corridors. This might unintentionally restrict sustainable transport options, such as tram extensions, any new walking/cycle paths or alternative transport solutions that reduce reliance on private vehicles, that may be proposed or restrict the need to implement infrastructure and transport solutions that address urban congestion and mitigate road user crash numbers and severity. In addition, the Metropolitan Adelaide Road Widening Act 1972, and associated Plan outlines provisions for identifying road widening requirements.	Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Policy 2.6 (page 202)
		<p>7.4.1 - Policy and Actions Table (Action 3.2.1) (page 244)</p> <p>Suggests consideration of the continuation of tree planting adjacent roads into the city and through the Park Lands, where that planting can provide canopy cover and shade, especially to the active transport network.</p>	<p>Noted the HMP does not intend to restrict planting to corridors – policy refers to continuous avenues.</p> <p>Planting is a key feature of policies in Chapter 7, revise Recommendation 3.2.1 as follows for greater clarity:</p> <p>Recommendation 3.2.1 - Ensure a distinction between the landscape character and planting of the city streets and edges and that of the Park Lands. Avoid continuing strong avenues of trees along streets along through roads into the city and extending which extend into the Park Lands. The avenues should stop at the Park Land edge.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Recommendation 3.2.1 (page 203)</p>
		<p>7.4.1 - Policy and Actions Table (Action 3.11.1)</p> <p>Acknowledges the desire to remove intrusive elements, including several roads, from the Park Lands to restore form and setting. Suggests that the function of these intrusive elements is considered prior to their alteration or removal. If the functionality is an ongoing requirement, then less intrusive solutions that respect the form and setting of the Park Lands may be considered.</p>	<p>Include a comprehensive list of intrusive elements in Section 6.4.3.</p> <p>Refer to Chapter 6, Section 6.4.3 – Intrusive Elements (page 187).</p>
		<p>7.4.1 - Policy and Actions Table (Action 5.3.1 and 5.3.2)</p> <p>Recognises that the existing bicycle and pedestrian links through the Park Lands will be maintained and supports the development of a strategic plan to improve connectivity for bicycle and pedestrian access.</p>	<p>Addressed in Chapter 7.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Recommendation 5.2.1 (page 207)</p>
5	Minister for	Advised that the draft HMP is an important milestone to assist the City of Adelaide in protecting the National	General comment that did not request a change to the National HMP.

Planning	Heritage listed Adelaide Park Lands and City Layout for future generations.	
	The document should be reviewed by Kurna community representatives, for accuracy of narrative and terminology used throughout the document particularly in reference to Kurna and Aboriginal peoples.	<p>The CoA has consulted with and invited feedback from KYAC and the draft HMP was presented and workshopped with the Reconciliation Committee.</p> <p>Revise Chapter 7 as follows and insert the following policies and recommendations:</p> <p>Policy 8.3 - Appropriate opportunities will be provided for Aboriginal people to be consulted on and involved in the management of their cultural heritage places and values, including intangible aspects.</p> <p>Recommendation 8.3.1 - Ensure that the City of Adelaide's Reconciliation Committee is regularly updated and consulted on changes and actions which may impact on Aboriginal cultural values in the Park Lands and City Layout to ensure the Kurna people are involved in the ongoing management of the Adelaide Park Lands and City Layout.</p> <p>Recommendation 8.3.2 - Maintain a permanent role for a Kurna representative on the Kadalilla/ Adelaide Park Lands Authority to ensure the Kurna people are involved in the ongoing management of the Adelaide Park Lands and City Layout</p> <p>8.3.3 Engage people with relevant expertise and experience in consultation to develop processes that ensure meaningful and effective engagement with the Kurna people.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 211)</p>
	Consider including an introductory statement noting that this document respectfully and deliberately does not include pre-settlement history, from either the Kurna community (preferred) or from the authors. It is important the absence of Kurna history in this HMP relative to the detail provided on post-settlement history is not perceived as a diminishment of Aboriginal history.	<p>There are several sections that demonstrate the enduring connection of the Aboriginal people to their lands including (but not limit; 3.1 Kurna Country, 4.2.2 Aboriginal Evidence.</p> <p>Consider recommendation for an introductory statement in context of broader document and purpose.</p>
Working with Kurna Miyurna is an essential aspect of managing the Adelaide Park Lands. Using terminology which is predictive of the preferred approach such as "working with", "in collaboration with", "in partnership with" instead of "assist" or "for" is important in empowering and giving voice, agency and mutual benefit to the Kurna community.	<p>Refine policies in Chapter 7 to use appropriate terminology.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 200 - 212)</p>	

Recommendation 1 - Item 7.1 - Attachment A

		<p>Sharing of information about Kurna culture, heritage or knowledge should only be undertaken with Kurna Miyurna consultation and cultural consent, including ongoing recognition of Indigenous Cultural and Intellectual Property (ICIP). Kurna Miyurna should be included in discussions and planning for all potential opportunities in the Park Lands and squares. Engagement with Traditional Owners can celebrate and embed cultural richness to create more holistic outcomes.</p>	<p>Refine Chapter 7, policy 8.2 (now 9.2) as follows: <u>Policy 9.2 - In consultation with the Kurna people, seek cultural consent and recognise the Indigenous Cultural and Intellectual Property protocol to appropriately manage sensitive or confidential information about Aboriginal Heritage values and places.</u> Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Policy 9.2 (page 212)</p>
		<p>Consider opportunities to provide an area or areas of Park Land that can be co-managed by the Kurna community for teaching and practicing of culture, showing what the plains/river area looked like and how it was managed prior to settlement. Noting a cultural burn was facilitated in Tuthangga/Carriageway Park (Park 17) in 2021. An area such as this could be used as an education tool within and outside of the Kurna community for all. The Dept for Environment and Water (DEW) has working models of co-managing National Parks with Traditional Owners which could be reviewed as an exemplar for an Adelaide Park Lands Management model.</p>	<p>Mentioned as an opportunity in the plan and in policy and is addressed in Chapter 7. Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Policy 8.3, Recommendations 8.3.1, 8.3.2 (page 212)</p>
		<p>Aboriginal Heritage Act 1988 - Several sites across the Park Lands and City Layout area are registered in the Register of Aboriginal Sites and Objects. Consider the inclusion of a map indicating these areas, to complement the other maps already in the document of the Local and State built Heritage Places within the National heritage listed area. Consult with Kurna Miyurna for appropriateness to share this information in this document.</p>	<p>Revise Section 4.1.1 (Chapter 7) to support the actions within the City of Adelaide Reconciliation Action Plan 2021 – 24 which includes the development of a Kurna Cultural Map. Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Recommendations 4.1.1 (page 206)</p>
		<p>Ensure that works and maintenance service contracts include not only 'notification procedures' upon discovery of Aboriginal cultural heritage but include clear follow up management procedures prepared in collaboration with the Kurna Miyurna and other relevant stakeholders which also works within the required statutory obligations. Consider including reference to the Draft Aboriginal Heritage (Miscellaneous) Amendment Bill currently out for public consultation which will change reporting procedures.</p>	<p>Include reference to Draft Aboriginal Heritage (Miscellaneous) Amendment Bill. Alternately consultant to note revision number of legislation.</p>

Recommendation 1 - Item 7.1 - Attachment A

	<p>Consider how to prioritise the delivery of on-ground works to preserve and enhance the Park Lands utilising existing reports, such as the Adelaide Park Lands Management Strategy, and minimise the funds spent on further reporting. It is noted that the Adelaide Park Lands Management Strategy is currently being updated by the City of Adelaide on behalf of Kadaltilla / Adelaide Park Lands Authority under the Adelaide Park Lands Act 2005.</p>	<p>Key projects for delivery are being considered throughout the update to the Adelaide Park Lands Management Strategy 2015-25. Note recommendation to streamline planning and delivery of projects in the Park Lands.</p>
	<p>The following recommendations directly relate to the planning system:</p> <ul style="list-style-type: none"> • Progress the creation of an Adelaide Park Lands and City Layout State Heritage Area – within the next 12 months. • Assess the designated landscapes identified in the HMP for State or Local Heritage listing – within the next 2 to 5 years. • Review the provisions of the Planning and Design Code (the Code) for concurrence with the policies of the HMP and prepare appropriate amendments for integration in future Code revisions – within the next 2 to 5 years. <p>The actions recommended in the draft HMP are high level and as such, it is difficult to comment on the implications of this document on the day-to-day operation of the planning system. However, it is considered that the HMP, once finalised, can be used to inform the Regional Planning program (in particular, review of The 30-Year Plan for Greater Adelaide), and could also be useful in informing future development assessments affecting the Adelaide Park Lands and City Layout.</p>	<p>The National HMP can inform the CoA's submission to the Greater Regional Adelaide Plan (in development).</p> <p>Refine Recommendation 7.3.3 (now 7.3.2) within Chapter 7 as follows:</p> <p>Recommendation 7.3.2 - Review the provisions of the South Australian Planning and Design Code for concurrence with the policies of this Heritage Management Plan and prepare appropriate amendments for integration in future Code revisions <u>including associated online spatial mapping and reference to all heritage levels such as world, commonwealth, national, state and local heritage listings on the heritage layer.</u></p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Recommendations 7.3.2 (page 209)</p>

Land Managers			
	Stakeholder	Summary of Submission	Response
6	Adelaide Cemeteries Authority	<p>Noted the alienation of the West Terrace Cemetery. Advised of their ongoing commitment to management of the Cemetery with regard to Burra Charter Principles. Requested the finalised HMP reflect:</p> <ul style="list-style-type: none"> • ACA investment in conservation projects, • ACA's ongoing management of flora and fauna including remnant vegetation • challenges securing funding for restoration of memorials / monuments • development of new burial areas • existing West Terrace Cemetery CMP objectives. 	<p>Add section within the HMP about ACA's role, issues, constraints and opportunities to relevant section, as noted in submission,</p> <p>Refer to Chapter 6, Section 6.6.4 (page 192)</p>
7	The University of Adelaide	<p>Advised of the University's Park 10 / 12 Sports Master Plan and that the HMP policies may limit expansion of university facilities.</p>	<p>The National HMP does not intend to limit future planning of facilities in the Park Lands. This is addressed through the City of Adelaide plans and processes.</p> <p>The submission does not request changes to the National HMP.</p>
		<p>Noted University's involvement in the Common Development Framework relating to South Australian Health and Biomedical Precinct, Lot 14.</p>	<p>The submission does not request changes to the National HMP.</p>
		<p>Noted University's involvement in developing the Victoria Drive/Frome Road heritage precinct.</p>	<p>The submission does not request changes to the National HMP.</p>
		<p>Noted also that the University is a major tenant of the National Wine Centre.</p>	<p>The submission does not request changes to the National HMP.</p>
8	Botanic Gardens and State Herbarium	<p>BGSH board feels their organisation is under-represented in the HMP, with opportunities to improve coordination, operational and planning linkages between Park Lands and BGSH management.</p> <p>Made the following recommendations relating to:</p> <p>1.3 – Recommendations</p>	<p>Add further discussion on contribution of BGSH to National Values.</p> <p>Refer to Chapter 5, Section 5.2.5 - Attributes of National Heritage Value (page 148).</p>
		<p>Page 1 – Point 3 - Those additional opportunities for additional bus stops near BGSH be included in DIT considerations</p>	<p>Noted. Location of bus stops is not a National Heritage consideration however public transport is important to reduce car parking.</p> <p>Alternative transport to reduce reliance on private vehicles is addressed in Recommendation 2.5.1.</p>

Recommendation 1 - Item 7.1 - Attachment A

			Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Recommendation 2.5.1 (page 201).
		Page 2 - Point 11 - Support BGSB staff to meet with Adelaide Park Lands Management Authority annually,	Noted. This feedback has been forwarded to the Kadaltilla / Adelaide Park Lands Authority Advisor. This opportunity is available to any agency.
		Page 2 and 4 - Points 18 and 64 - BGSB should be noted as a potential partner for the collaborative River Torrens riverbank remediation programs.	Relates to implementation of specific recommendations in Chapter 7. Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table, Policy 2.2, Recommendations 2.2.1, 2.2.2 (page 201).
		Page 2 - Point 27 - Street parking is an important revenue income stream for BGSB and request that the Hackney Road and Plane Tree Drive parking be considered outside of the car parking reduction target of the Park Lands.	Noted. This matter is outside the scope of the HMP as detailed transport and car parking arrangements are not national heritage considerations. On-street parking changes to be considered through separate processes (if and as required).
		Page 3 – Point 37 - Support for statue of Queen Iparrityi to be within the Adelaide Botanic Gardens rather than the CBD.	Amend reference in Chapter 6, Section 6.3 to a “location in the City of Adelaide”. Refer to Chapter 6 Section 6.3 – Aboriginal Heritage (page 186)
		2.3 Location - Page 3 Map - Ensure consistency of boundaries of defined area of Park 11/ Mistletoe Park,	Amend Park 10 and 11 boundaries. Refer to Chapter 2, Section 2.3 – Location map (page 10)
		Page 38 - ABG should be acknowledged as a place for its contributions to community, culture and tourism.	Minor change to include BGSB. Refer to Chapter 4, Section 4.2.7 - Park Lands- Landscape Character (page 61). Refer to Chapter 5, Section 5.2.5 - Attributes of National Heritage Value (page 148)
		Page 39 - The Board of the Botanic Gardens and State Herbarium should be recognised more formally as sustaining and protecting Adelaide Botanic Garden and Botanic Park in the parklands as a manager of 20% of the parklands	Minor change to better describe BGSB contribution. Refer to Chapter 4, Section 4.2.7 - Park Lands- Landscape Character (page 61).
		Section 4.2.7 - Park Lands (Page 9 Landscape Character (pdf page 137)) - The ABG and Botanic Park are significant contributors to the Park Lands character and botanical integrity but are not listed here as worthy of mention. We recommend that they are included in this context.	Minor change to better describe BGSB contribution. Refer to Chapter 4, Section 4.2.7 - Park Lands- Landscape Character (page 61).

		Section 4.3.10 Tainmunda / Botanic Gardens / River Torrens Park (Park 11) Page 22 (pdf page 150) - Correct name to Adelaide Botanic Garden throughout HMP	Correct name to Adelaide Botanic Garden throughout the National HMP.
		Pdf Page 185 - The importance of ABG is noted in the values statements but is generally under-acknowledged in other key areas of this document e.g. the table on page 192 discusses allowance for civic, public, cultural and institutional buildings and domains and publicly accessible landscaped open space and designers and does not list the Adelaide Botanic Garden site contribution nor the many Directors and Managers which contributed to both the botanic gardens and more general parklands landscape design.	Acknowledge the ABG and Botanic Park site contribution to the Park Lands Design by identifying and including the Adelaide Botanical Garden in Section 5.2.5 as an attribute of National Heritage value. Refer to Chapter 5, Section 5.2.5 - Attributes of National Heritage Value (page 148)
		Pdf Page 195 Park 11 - To “Reflects landscape design of John Ednie Brown and August Pelzer” ADD “and the Directors of the Adelaide Botanic Garden and Botanic Park”.	Include reference to the Directors of ABG and Botanic Park within the table of Section 5.2.5. Refer to Chapter 5, Section 5.2.5 - Attributes of National Heritage Value (page 148)
		Pdf Page 201 - Review references from DASH Architects included in HMP (pg 201) that do not accurately reflective of organisation and land uses	The HMP references the DASH Report and the purpose of the HMP is not to edit previous reports by other consultants. However references to the report will be reviewed.
		Pdf Page 224 - Include Botanic Gardens & State Herbarium Act 1979 and associated regulations in list of management acts	Include Botanic Gardens & State Herbarium Act 1979 and associated regulations in list of management acts. Refer to Chapter 6, Section 6.2.10 - Botanic Gardens and State Herbarium Act 1978 (page 185)
9	Central Adelaide Local Health Network	Support the proposed plan and commend the Adelaide City Council on this initiative and its intent to be a resource to inform future developments, decision making and management strategies.	General comments that do not request a change to the National HMP.
		Chapter 4, page 41 - East of rail line, Karen Rolton Oval. First paragraph refers to 'the New Royal Australian Hospital' this should read 'Royal Adelaide Hospital'.	Change 'new Royal Australian Hospital' to 'Royal Adelaide Hospital'
		Chapter 4 - page 43 - Bonython Park west of the Railway Line - although currently accurate this may need to reflect the future site of the new Women's and Children's Hospital site.	Amend to reference future site of the new Women's and Children's Hospital.

Local Government			
	Stakeholder	Summary of Submission	Response
10	City of West Torrens	Advised there were no issues arising from the HMP that affect City of West Torrens.	No changes to National HMP were requested.
11	City of Charles Sturt	Commend the approach that has been taken.	No changes to National HMP were requested.
Community Groups			
	Stakeholder	Summary of Submission	Response
12	South-West City Community Association	Have little faith the HMP will produce stronger protections for the Park Lands, given the recent State Government projects ignoring existing protections.	It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for. General comment about recent developments in the Park Lands that does not request a change to the National HMP.
		SA's Planning and Design Code, and recent changes to the legislation allowing infrastructure of virtually any kind on Park Lands. Protection of the Park Lands should be paramount, and should exclude the State Government of the day, and any others for that matter, from having 'carte blanche' over decisions regarding developments on the Park Lands, particularly with regard to heritage. Once it is gone, that is it.	This is a comment about the State Government Planning and Design Code and legislations. General comment about recent developments in the Park Lands that does not request a change to the National HMP
		There should be clear and enforceable legislative protection of the Park Lands to allow it to be, and remain, the Open Green Public Adelaide Park Lands	"As Above" The relevant legislation is the Adelaide Park Lands Act (SA) 2005.
		It does not matter what new documents are created or updated to afford protection to the Park Lands if state and local governments, and planners, continue to 'spin' the contents of these documents to provide for whatever outcomes they desire. This needs to be addressed as the highest priority because without adequate protection going forward anything put into this proposed document will not matter.	"As Above"

Recommendation 1 - Item 7.1 - Attachment A

13	The North Adelaide Society	TNAS acknowledged the significant work undertaken in preparation of the report.	General comment that does not request a change to the National HMP.
		Noted State Government projects have not been sympathetic to the heritage values of the Park Lands.	It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for. General comment about recent developments in the Park Lands that does not request a change to the National HMP
14	Adelaide Park Lands Association	The APL Assoc wholeheartedly endorse the HMP.	General comment supporting National HMP.
		For the integrity of the HMP further identification and discussion of the following is essential: <ul style="list-style-type: none"> · ongoing conservation and management challenges despite National Heritage Listing and Park Lands Act · lack of coherence between legislative frameworks for different levels of government (National, State and Local) · lack of shared policy for land managers · planning system dictating changes to cultural landscape management policy, · lack of public scrutiny of heritage impact assessment including those for Kaurna Country · introduction of special legislation to override Adelaide Park Lands Act. 	Add a new section 6.8 – Key Issues within Chapter 6 to identify and discuss current issues. Refer to Chapter 6, Section 6.8 – Key Issues (pages 194 - 196) Revise Chapter 7 as follows and insert the following policies and recommendations: Policy 6.10 – Form a Conservation Agreement under the EPBC Act between the Commonwealth Minister for the Environment and the South Australian state government, in consultation with Kadaltilla / Adelaide Park Lands Authority, to protect the National heritage values of the Adelaide Park Lands and City Layout. The agreement should describe an appropriate level of development in the Park Lands as well as in adjacent previously alienated areas of Park Land Recommendation 6.10.1 - Engage an expert consultant to facilitate and establish a Conservation Agreement under the EPBC Act between the Commonwealth Minister for the Environment and the South Australian state government, in consultation with Kadaltilla / Adelaide Park Lands Authority and other relevant stakeholders with the purpose of defining acceptable levels of development within and adjacent to the Park Lands. Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 210)
		Noted recommendation to amend the Adelaide Park Lands Act boundary with the National Listing is contentious. Amend to read: <i>“In consultation with the broader community Kadaltilla / Adelaide Park Lands Management Authority should review and consider redefining the boundary of the Adelaide Park Lands under the Adelaide Park Lands Act 2005 to align to the National Heritage List boundary.”</i>	Delete 7.1.5 - any changes to the Adelaide Park Lands Act would be done in consultation with Kadaltilla / Adelaide Park Lands Authority.
		Requested the HMP provide guidance around the EPBC Act referral process, including actions that would require	More detail can be added around the referral process. All activities that may impact on the national values require self-assessment. It would be difficult (with

Recommendation 1 - Item 7.1 - Attachment A

		<p>self-assessment (including cumulative incremental impacts).</p>	<p>possible unintended consequences) to develop a definitive list of activities that require self-assessment/referral and those that don't. Suggest further discussion is added on this in the 'Current Issues' section, as noted above, with reference to the Attributes of National Heritage Values.</p> <p>Add a new section 6.2.2 – Instigating a Referral to within Chapter 6 include discussion on referrals.</p> <p>Add a further new section 6.8.2 – Past referrals to the Commonwealth to identify some of the issues that have been encountered.</p> <p>Refer to Chapter 6 Section 6.2.2 – Instigating a Referral (page 179) and 6.8.2 – Past Referrals to the Commonwealth (page 196).</p>
		<p>Provide clear information on how bodies such as the City of Adelaide and/or APLA might instigate federal referrals or Ministerial intervention under the EPBC Act where the proponent of a development (such as the State Government) may neglect to do so.</p>	<p>Add a new section 6.2.2 – Instigating a Referral to within Chapter 6 include discussion on referrals.</p> <p>Refer to Chapter 6 Section 6.2.2 – Instigating a Referral (page 179)</p>
		<p>Amend 2.1.5 and 2.32 regarding activation project for alienated sites to <i>“Identify areas at risk of alienation / encroachment and prioritise these for restoration projects, cultural programming and temporary events to encourage community use, appreciation, and connection with the Park Lands.”</i> (emphasis in red original).</p>	<p>Delete 2.3.2 (duplication) and amend Recommendation 2.1.5 (now 1.1.5) within Chapter 7 as follows:</p> <p>Recommendation 1.1.5 – Identify areas at risk of <u>alienation/encroachment within the Park Lands</u> and prioritise these for <u>restoration projects, cultural programming and temporary activation projects</u> and events to encourage <u>a more diverse community use, broader appreciation, and connection with the Park Lands, with the aim that these areas are not seen as areas for development.</u></p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 20)</p>
		<p>The P&D Code include an overlay for all levels of heritage listings in South Australia: World; Commonwealth; National; State; and Local Heritage, and that these heritage places are also identified in appropriate spatial mapping.</p>	<p>Add spatial mapping policy.</p> <p>Revise Recommendation 7.3.3 (now 6.3.2) within Chapter 7 as follows:</p> <p>Recommendation 6.3.2 – Review the provisions of the South Australian Planning and Design Code for concurrence with the polices of this Heritage Management Plan and prepare appropriate amendments for integration in future Code revisions <u>including associated online spatial mapping and reference to all heritage levels such as world, commonwealth, national, state and local heritage listings on the heritage layer.</u></p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 209)</p>
		<p>Tracking of cumulative impacts be undertaken with specific reference to the National Heritage listing</p>	<p>As above, a condition assessment is a requirement of the HMP review.</p>

		<p>boundary of the Park Lands in a methodical and measured fashion that considers:</p> <ul style="list-style-type: none"> • 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’. 	<p>Change Policy wording to Policy 8.3 to strengthen consideration of cumulative impacts and use trends.</p> <p>Amend Policy 8.3 within Chapter 7 as follows:</p> <p>The Heritage Management Plan is reviewed every five years, consistent with Section 341X of the EPBC Act, or sooner should major change or <u>significant cumulative impacts</u> occur in the interim.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 212)</p> <p>Also, refer above to DCCEEW comments regarding cumulative change and suggested new Policy and Recommendation as per below:</p> <p>Policy 1.7 – Protect the Park Lands from future potential cumulative impacts of land use.</p> <p>Recommendation 2.7.1 – Reduce potential cumulative impacts on the Park Lands by monitoring and evaluating changes in land use and implementing a holistic view of tracking any proposed changes. This HMP should act as a snapshot in time and provides a record of the state of the National Heritage values by which a comparison should be made with any future changes.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (page 202)</p>
		<p>An analysis should be undertaken to establish the carrying capacity for the Park Lands which defines the extent and character of sympathetic development consistent with the protection of National Heritage values, (recognising that the Park Lands are likely already close to capacity)</p>	<p>“As Above”</p>
		<p>Consideration should be given to undertaking a strategic assessment under the EPBC Act, as a higher-level strategic planning process for the National Heritage place. This might include the carrying capacity analysis recommended above</p>	<p>Revise Chapter 7 as follows and insert the following policies and recommendations:</p> <p>Policy 6.10 – Form a Conservation Agreement under the EPBC Act between the Commonwealth Minister for the Environment and the South Australian state government, in consultation with Kadaltilla / Adelaide Park Lands Authority, to protect the National heritage values of the Adelaide Park Lands and City Layout. The agreement should describe an appropriate level of development in the Park Lands as well as in adjacent previously alienated areas of Park Land</p> <p>Recommendation 6.10.1 - Engage an expert consultant to facilitate and establish a Conservation Agreement under the EPBC Act between the Commonwealth Minister for the Environment and the South Australian state government, in consultation with Kadaltilla / Adelaide Park Lands Authority and other relevant</p>

Recommendation 1 - Item 7.1 - Attachment A

			<p>stakeholders with the purpose of defining acceptable levels of development within and adjacent to the Park Lands.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 210)</p>
		<p>A review be undertaken to establish how City, State and Commonwealth systems can achieve greater coherence in the protection and management of the National Heritage place, including with regard to heritage impact assessment. This would assist in identifying owner and proponent obligations under the EPBC Act.</p>	<p>"As Above".</p>
		<p>Ensure all heritage impact assessments prepared by relevant heritage experts publicly available.</p>	<p>Assessments are available through the Department of Climate Change, Energy, the Environment and Water.</p> <p>Addressed within Recommendation 2.6.1 and 6.6.1 within Chapter 7.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 204 and 210)</p>
15	South-East City Residents Association	<p>Supports the submission by the Adelaide Parklands Association to the CoA regarding Draft National Heritage Management Plan for the Adelaide Park Lands and City Layout. In particular, the provision of better safeguards and monitoring to assess new development proposals and the ongoing health and amenity of the Park Lands in accordance with National Heritage values; and to recognise the important heritage value of community volunteerism and advocacy.</p>	<p>The submission of the Adelaide Park Lands Association has been considered and in response a number of changes have been recommended to the National HMP as suggested by the Association.</p> <p>Refer to responses to Adelaide Park Lands Association.</p>
		<p>Concerned about the continued incremental loss and degradation of this precious urban green space in Adelaide. The loss and degradation are not only occurring from the erection of new permanent buildings such as hospitals, police barracks, schools (facilitated in many cases by the state government rezoning parts of the Park Lands or enacting special legislation that overrides other statutory protections), but also from the laying of more heat retaining hardstand surfaces (e.g. bitumen and concrete for motor sports in Victoria Park), access roads and car parks.</p>	<p>It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for.</p> <p>General comment that does not request a change to the National HMP.</p>

Other Stakeholders			
Community Emails			
	Stakeholder	Summary of Submission	Response
16	Email responsee	Supports the ideas suggested for improving the security of our Parklands. It appears that not enough citizens realise the present and future value of our Parklands. If we do not reverse this, our Parklands will continue to be 'picked off' by State Governments for projects that they deem will attract more positive votes for them than negative. It is a very serious and important issue and Council is right to endeavour to encourage debate.	It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for. General comment about recent developments in the Park Lands that does not request a change to the National HMP.
17	Email responsee	Supports the draft National Heritage Management Plan for the Adelaide Park Lands.	Supportive comment that does not request a change to the National HMP.
18	Email responsee	Supports APA submission to the City Council on the Swanbury Penglase draft report.	The submission of the Adelaide Park Lands Association has been considered and in response a number of changes have been recommended to the National HMP as suggested by the Association. Refer to response to submission by Adelaide Park Lands Association.
19	Email responsee	Supports development in the Park Lands that is for community use, does not support anything that creates private spaces (including office and housing).	It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for. General comment that does not request a change to the National HMP.
20	Email responsee	Noted inadequacy of self-assessment provisions of National Heritage listing. Should ensure there are no new buildings, no fencing of parklands for extended periods of time for short term financial gain and no dicing of existing parkland areas. They are a precious resource and once trampled upon gone forever.	It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for. Additional information is included in the National HMP on self-assessment requirements
		The Park Lands need to be protected from alienation and unsympathetic development and Infrastructure.	General comment about recent developments in the Park Lands that does not request a change to the National HMP
21	Email	Supports the submission by the Adelaide Parklands Association.	The submission of the Adelaide Park Lands Association has been considered and in response a number of changes have been recommended to the National HMP as suggested by the Association. Refer to response to submission by Adelaide Park Lands Association.

Recommendation 1 - Item 7.1 - Attachment A

		<p>The important aspects are:</p> <ol style="list-style-type: none"> 1. To preserve the world-unique nature of the Adelaide Parklands 2. To ensure continued free public access to nature in all parts of the Adelaide Parklands 3. To prevent further loss of Parklands to building of any permanent nature – whether for public or private facilities. 4. To maintain Adelaide’s attractive/ green appearance – which makes it a desirable place to live in and/or visit for many purposes. 	<p>It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for.</p> <p>General comment that does not request a change to the National HMP.</p>
		<p>Concerned the State Government have recently overridden Council and planning regulations to select sites within the Parklands for development – including permanent buildings and fenced-off areas within the Parklands – and appears empowered to do so</p>	<p>General comment about recent developments in the Park Lands that does not request a change to the National HMP</p>
		<p>Believe the Parklands should have State Heritage listing, National and World Listings – as these should protect the Parklands from further threat of development.</p>	<p>The Park Lands have National Heritage listing and the City of Adelaide is currently working towards developing a Tentative World heritage Listing Bid.</p> <p>The Adelaide Park Lands Management Strategy supports State Heritage listing.</p> <p>The issues raise have been addressed in Policy 6.9 and Recommendation 6.1.3, 6.91 within Chapter 7.</p> <p>Refer to Chapter 7, Section 7.4.1 - Policy and Recommendations Table (page 208 and 210)</p>
Your Say Summary			
22	YourSay Submission	<p>No comment specific to HMP.</p> <p>Concerned that heritage status can be overridden by Government and heritage listing should have permanency.</p>	<p>It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for.</p> <p>General comment that does not request a change to the National HMP.</p>
23	YourSay Submission	<p>No comment specific to HMP.</p> <p>Made queries around removing eucalypt trees due to fire risk and removing the Aquatic Centre to create an oval.</p>	<p>General comment that does not request a change to the National HMP.</p>
24	YourSay Submission	<p>In respect of: "Identify areas at risk of encroachment within the Park Lands and prioritise these for activation projects and events to encourage community use, appreciation, and connection with the Park Lands."</p>	<p>It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for.</p> <p>Addressed in Chapter 7 of the National HMP.</p>

Recommendation 1 - Item 7.1 - Attachment A

		Suggested activation of the Park Lands through events may threaten the conservation of the Park Lands.	
25		Have little faith the HMP will produce stronger protections for the Park Lands given recent State Government projects ignoring existing protections.	General comment about recent developments in the Park Lands that does not request a change to the National HMP
26	YourSay Submission	Advised the Park Lands should be 'left untouched' for the enjoyment of the people.	It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for. General comment that does not request a change to the National HMP.
27	YourSay Submission	Questioned the wisdom of having so many overlapping Management Plans for the Park Lands.	It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for. It is intended that there will be alignment between the different Management Plans.
		Noted the HMP supports the intention of the Park Lands to provide access to nature, clean air, and relaxation to the Public. Highlighted the need to maintain open green space in response to climate change and increasing urban temperatures.	This has been addressed and identified in the National HMP.
		Concerned the State Government overrides the role of the City of Adelaide to look after the Park Lands.	General comment about recent developments in the Park Lands that does not request a change to the National HMP, noting the NHMP provides additional protections.
28	YourSay Submission	Supported greater protection of the Park Lands for its heritage value but also societal value of the open space, particularly in light of recent Government and developer projects affecting the Park Lands.	It is intended the HMP will clearly identify and articulate the values and guide future decision making. It also aims to ensure these values and physical components are appropriately cared for. General comment about recent developments in the Park Lands that does not request a change to the National HMP.
		Highlighted the importance of River Torrens to Adelaide and suggested Park Lands Boundary and protections should include full length of River from Hills to Sea.	The full length of the Karawirra Peri / River Torrens is outside the scope of the National Heritage values.
29	YourSay Submission	They feel the current Government doesn't value heritage or Park Lands. The highest priority is advocating for and promoting the return of alienated land to Park Lands.	Addressed in Section 7.4.1 – Policy and Recommendations Table within Chapter 7. Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (pages 200 – 212).

30	YourSay Submission	Noted the policies within the HMP are only as useful as the agencies that are prepared to apply them in their decision making. The highest priority is prohibition of alienation and further erosion of Park Lands	It is intended the HMP will clearly identify and articulate the values and guide future decision making including the return of alienated land. It also aims to ensure these values and physical components are appropriately cared for. Addressed in Section 7.4.1 – Policy and Recommendations Table within Chapter 7. Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (pages 200 – 212).
Community Letters (via consultation on the Land Management Plan for the Adelaide Park Lands)			
31	Community member	<p>Key issues and opportunities that affect the conservation of the park lands and their ongoing use that have not been included in the HMPlan</p> <p>There is clear policy overlap and alignment between the CLMP draft and this draft HMPlan because both play a key role in one of the mutually shared key purposes:</p> <p>The HMPlan has multiple references to the park lands’ CLMP. Now is the time to align content, to avoid misalignment between the two policy docs.</p> <p>The process of better aligning the policy documents’ content during the March to May 2023 window of opportunity will be beneficial to each.</p> <p>The following CLMP references appearing in the HMPlan require alignment now – not in “two to five years” as is currently planned:</p> <ul style="list-style-type: none"> · Review the Park Lands CLMPs and all other master plan documents to ensure that the heritage value of the natural topography is described. · Ensure that master plans and other strategic documents for the City Squares contain objectives for strengthening their rectilinear form and allow for the return of land removed by dissecting roads. · Review the Adelaide Park Lands CLMP to recognise the cultural significance of the nineteenth century spatial designs where these are represented in the Park Lands. Future revegetation zones should be planned to conserve the integrity of the spatial design and aesthetic intent. 	<p>Amendments have been made to the CLMPs to ensure there is alignment between the Management Plans. Refer to Policy 6.3.</p> <p>Alignment with CLMP has been addressed in Policy 6.3 within Chapter 7.</p> <p>Refine and combine Recommendation 7.3.4 (now 6.3.1) and 7.3.2 as follows:</p> <p>Recommendation 6.3.1 - Review the Park Lands Management Strategy and the Adelaide Park Lands Community Land Management Plan for concurrence with the policies of the National Heritage Management Plan.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (pages 209).</p>

Recommendation 1 - Item 7.1 - Attachment A

		<p>· Review the Adelaide Park Lands Community Land Management Plan for the Park Lands and City Squares for concurrence with this Heritage Management Plan.</p> <p>Integrate the heritage management guidelines into future CLMPs, lease and licencing agreement, maintenance service contracts, and other management documents.</p>	
		<p>The matter of related revegetation and biodiversity also needs attention and inclusion in the current (March) draft of the HMPlan. For example: Excerpt sourced from HMPlan section 6.4.2: Integrity ... The integrity and legibility of nineteenth century and early twentieth century landscape designers such as John Ednie Brown and August Pelzer has been obscured by later revegetation. Revegetation and biodiversity of the Park Lands is valued by the local community and an important community building activity. Large areas of the Park Lands have been set aside for this purpose through the CLMP process. An opportunity exists to review the CLMPs5 to plan future revegetation to conserve and restore the earlier layers of significance, including the replacement of historic plantings.</p>	<p>Policy 6.3 in Chapter 7 seeks to Integrate the policies contained in this Heritage Management Plan into all future planning documents including the Park Lands Management Strategy, Community Land Management Plans, and future statutory planning controls.</p> <p>Refer to Chapter 7, Section 7.4.1 – Policy and Recommendations Table (pages 209).</p>
		<p>The reference on page 11 about the Langmead and Johnson 'authorship of the Adelaide Plan' claim has been addressed more recently than 2008 and the authors might benefit from the new information (as would the draft HMPlan). Heritage architect Peter Bell revisited this academic squabble in 2018 and wrote an appendix piece with compelling content. (Peter Bell, 'Was it really Light's Plan?' – appendix essay in: Heritage Assessment – Adelaide Park Lands and City Squares, DASH Architects and Peter Bell, 17 May 2018, pages 77–82.) Bell's work threw much doubt on Langmead and Johnson's 1986 thesis and left little doubt that it was, after all, Light's Plan.</p>	<p>Retain as Peter Bell's assessment is referenced several times throughout the history section, beginning page 30. The document supports that Light is the author of the Adelaide Plan.</p>
		<p>Acreage of the Adelaide park lands: see Section 4, page 8 at 4.2.7. The authors are in error claiming that the park lands' total area comprises 9.31ha (should be 931ha, or as is more commonly claimed, 930ha). Similarly, a reference to 7.6ha is almost certainly meant to be 760ha</p>	<p>Correct 931ha to 930ha and 7.6ha to 760ha.</p> <p>Refer to Chapter 4, Section 4.2.7 – Park Lands (page 61)</p>
		<p>List of park lands state heritage places: page 207 of the HMPlan pdf doc. There is no reference to the 10 places</p>	<p>The Thebarton Mounted Police Barracks is not within the boundaries of the National Heritage place and is no longer a State Heritage place..</p>

Recommendation 1 - Item 7.1 - Attachment A

		at the SAPOL barracks in Park 27. Is this because the 'New Women's and Children's Hospital Act 2022' promptly removed these from the listing once proclaimed? Is it assumed then that the interacting Heritage Places Act has been already amended to formalise this? Worth checking	
		PDF page 225: reference to the operational date of the Adelaide Park Lands Management Strategy 2015–25. This was signed off by council in 2016, but not until August 2017 by the minister. The reference to '2018' is puzzling.	Retain as the published issue is dated January 2018. Refer to Chapter 6, Section 6.2.3 – Adelaide Park Lands Act 2005 (page 180)
		Page 3 of Chapter 6 (and pages to follow) authors claim that “a conservation plan [is] defined as a Heritage Standard”, but communications seen, provided by the SA Heritage Council in 2021, is that a Heritage Standard might be a substitute for a conservation plan, but it is apparently not the same thing. (Email letter: SA Heritage Council to APA President, Shane Sody, 2 March 2021.)	Correct the wording in accordance with advice from Heritage SA. Refer to Chapter 6, Section 6.2.7 State Heritage Areas (page 181)
		Page 5 of Chapter 6 (PDF page 228) there is reference to park lands zones (plural) but there is only one park lands zone (one of seven zones for planning purposes in the City of Adelaide)	Within Section 6.2.9, change “Adelaide Park Lands Zones” to “Adelaide Park Lands Zone”. Refer to Chapter 6, Section 6.2.7 State Heritage Areas (page 183)
		Chapter 6 (PDF page 224): section 'Governance and Management' Land Use Management, the text is “Corporation of the City of Adelaide (approximately 89%)”. The commonly accepted ratio (within ACC) is ACC 74% and state government the remainder. This is ACC's printed view in many of its park lands policy docs (even though it is not accurate because other agencies such as the commonwealth government are responsible registered proprietors of some small parcels of land perceived as 'park lands'. There are other agencies, too	Correct “approximately 89%” to “approximately 80%”. Refer to Chapter 6, Section 6.2.7 State Heritage Areas (page 189)
		Author/typesetter: reader navigation Amendment of document footers would improve reader accessibility. A lack of sufficient footer detail mean that the reader cannot easily tell where he or she is. A page number is insufficient. Better to amend footers to show chapter number, title, and page number (and of total pages), eg: Chapter 4, chapter title, page 3 (of 12)	Page numbering to be continuous.