

Greater Adelaide Regional Plan Kadaltilla Submission

October 2024

Acknowledgement of Country

The Kadaltilla / Adelaide Park Lands Authority (Kadaltilla) acknowledges the Kurna people as the traditional owners of the Adelaide Plains and pays respect to Elders past and present. Kadaltilla recognises and respects the cultural heritage, beliefs and relationship which the Kurna people have with the land and acknowledges that they are of continuing importance to the Kurna people living today.

Kadaltilla extends that respect to other Aboriginal Language Groups and other First Nations.

Kadaltilla is the principal advisor to both the Council and the State Government on the protection, management, enhancement and promotion of the Adelaide Park Lands.

Kadaltilla is a traditional Kurna word meaning Green place / Green lands / Park Lands.



Table of Contents

Acknowledgement of Country	2
Introduction	4
1. Protection of the Adelaide Park Lands: A Consistent and Strengthened Commitment	5
2. Governance and Funding Models for Regional Open Space	5
3. Clarify State Significant Infill Areas and Adelaide Park Lands Boundaries.....	5
4. Championing Biodiversity and Climate Resilience.....	6
5. Prioritise Design-Led Responses: Shaping Sustainable Urban Growth.....	6
6. Support World Heritage Listing and Heritage Places.....	6
7. Ancillary and Typographical Errors.....	7
8. Conclusion	7



Introduction

On 9 September 2024, the State Planning Commission advised the Kadaltilla / Adelaide Park Lands Authority (Kadaltilla) that the Greater Adelaide Regional Plan (the Plan) would be open for consultation from Monday, 23 September 2024 until 5:00 pm Monday, 4 November 2024. This submission provides Kadaltilla's response to the Plan.

The Plan will provide a vision and comprehensive strategy for the sustainable development of Greater Adelaide over the next 30 years. The Plan will identify where an extra 315,000 homes can be located and where jobs will be created as the state's population expands. It also addresses the maintenance of green spaces and tree canopies, modernising essential services and infrastructure, recognising neighbourhood character, and prioritising environmental sustainability.

Kadaltilla recognises the importance of this Plan in addressing the unique challenges and opportunities facing Greater Adelaide, particularly concerning the Adelaide Park Lands, which are a treasured asset that embodies our region's historical, cultural, and environmental heritage. As we advocate for the preservation and enhancement of the Park Lands, we believe it is essential to align the objectives of the Plan with a vision that prioritises ecological integrity, community well-being, and cultural significance. Through this submission, we aim to contribute constructive insights and recommendations that will strengthen the Plan's commitment to protecting the Park Lands for current and future generations.



1. Protection of the Adelaide Park Lands: A Consistent and Strengthened Commitment

Kadaltilla notes the Plan's reference on p.88 to "*recognising and protecting the Adelaide Park Lands as historically, culturally, and environmentally significant while providing a range of recreation and sport facilities for the community.*" While this is a positive inclusion, we believe the wording can be strengthened and made more consistent with the **Adelaide Park Lands Management Strategy (APLMS)**.

The Adelaide Park Lands serve as a critical environmental and cultural asset. They are globally unique, holding deep Aboriginal significance and contributing substantially to biodiversity and climate resilience. The language used in the Regional Plan should reflect a commitment to holistically protect and celebrate the Adelaide Park Lands, consistent with their status as a living landscape.

Recommendation:

- Revise the statement on p.88 to include specific commitments to biodiversity conservation, cultural heritage preservation, and community engagement, ensuring it aligns more closely with the APLMS. Consider language such as: "Recognise and protect the Adelaide Park Lands not only as historically, culturally, and environmentally significant but also as essential for biodiversity conservation, community well-being, and ecological health."

2. Governance and Funding Models for Regional Open Space

Action 13 in the Plan proposes to investigate new governance and funding models to establish, manage and equitably distribute regionally significant open space, including the Adelaide Park Lands and to facilitate a new 'Northern Parklands'.

As the principal advisor to the City of Adelaide and the State Government on the protection, management, enhancement and promotion of the Adelaide Park Lands, Kadaltilla recommends legislative reform to ensure that governance and funding of the Adelaide Park Lands recognises the range of roles the Adelaide Park Lands play in recreation and sport, biodiversity, tourism and major events, sustainability as well as impacts from development on growth corridors adjacent to the City.

The APLMS identifies a range of priority projects to guide future investment in the enhancement and protection of the Adelaide Park Lands. Kadaltilla recommends a greater emphasis on partner funding arrangements and the consideration and establishment of new funding mechanisms to support the coordination and delivery of the Adelaide Park Lands Management Strategy, noting the limited operating and capital investment beyond the recent commitments of the City of Adelaide.

Recommendation:

- Any changes to governance and funding of the Adelaide Park Lands should be done in consultation with the Kadaltilla / Adelaide Park Lands Authority and the City of Adelaide.

3. Clarify State Significant Infill Areas and Adelaide Park Lands Boundaries

The diagram on p.40, which identifies State Significant Infill Areas, appears to show these infill areas overlapping with the Adelaide Park Lands. This lack of clarity could lead to misunderstandings about the intention to develop within Adelaide Park Lands boundaries, which would be at odds with the statements about their protection.

We urge the Commission to clarify the boundaries of these infill areas, ensuring that the Adelaide Park Lands remain off-limits to development. Infill areas must be sensitively located and designed to preserve the integrity of the Adelaide Park Lands, aligning with the broader goals of conservation, green space protection, and cultural preservation.

Recommendation:



- Provide a detailed explanation and mapping of the boundaries of State Significant Infill Areas outside of the Adelaide Park Lands.

4. Championing Biodiversity and Climate Resilience

Kadaltilla is particularly supportive of “*Outcome 4: A Greener, Wilder, and More Climate-Resilient Environment*”, but we have concerns about the weighting of priorities within this vision. While the Plan acknowledges the importance of green spaces, there seems to be an emphasis on the Adelaide Park Lands as spaces for ‘open space’ and ‘sport and recreation’.

This approach, while valuable, overlooks the critical biodiversity and ecosystem services that the Adelaide Park Lands provide. From urban cooling and stormwater management to habitat protection and carbon sequestration, the Adelaide Park Lands play a vital role in Adelaide's environmental resilience.

Recommendation:

- Incorporate biodiversity targets and strategies into the Plan, ensuring that policies reflect the Adelaide Park Lands’ importance for biodiversity. This could include actions such as developing a biodiversity action plan, conducting regular ecological assessments, and enhancing habitat connectivity within and around the Adelaide Park Lands.

5. Prioritise Design-Led Responses: Shaping Sustainable Urban Growth

Kadaltilla commends the emphasis on ‘design’ and ‘design-led responses’ throughout the Plan. Design is a crucial tool in reconciling the complex demands of urban growth, heritage protection, environmental sustainability, and liveability.

The use of design-led approaches is particularly important in the Adelaide Park Lands, noting the role it plays framing the CBD and North Adelaide and the interface with inner metropolitan Adelaide. Additionally careful thought must be given to balancing development with conservation. Thoughtfully designed infrastructure can support the liveability and community and public amenity sought from the Adelaide Park Lands in balance with biodiversity, improved water management, and enhancing the cultural and historical significance of the Park Lands.

Recommendation:

- Establish design guidelines for developments adjacent to the Adelaide Park Lands that prioritise ecological integrity, cultural heritage, and community use. This could involve setting criteria for landscape architecture, sustainability practices, and community engagement processes to ensure that design contributes positively to the Adelaide Park Lands.

6. Support World Heritage Listing and Heritage Places

Kadaltilla commends the inclusion of the UNESCO World Heritage Listing Bid for Adelaide and its rural settlement landscapes and the greater promotion of the heritage values of National, State and Local heritage-listed places.

Kadaltilla fully supports the ongoing efforts toward the World Heritage Listing for the Adelaide Park Lands and Greater Adelaide's cultural landscapes. We reaffirm our commitment to ensuring that the Adelaide Park Lands are recognised for their global significance. Achieving this status will further solidify the need for strong protective measures within the Regional Plan.

World Heritage listing of the Adelaide Park Lands would be an enabler of tourism for South Australia, as per other World Heritage Listed landscapes.

In addition, State Heritage listing would enhance the protection of the Adelaide Park Lands and recognise the value of the Adelaide Park Lands to the people of South Australia.



Recommendation:

- Include specific strategies within the Plan that support the World Heritage Bid, such as promoting community awareness and involvement in heritage conservation efforts, conducting regular assessments of heritage values, and ensuring that any development aligns with the objectives of the World Heritage status.
- State Heritage Listing of the Adelaide Park Lands and City Layout is a Strategic Priority in the Adelaide Park Lands Management Strategy - Towards 2036 and Kadaltilla Strategic Plan 2023-2028 and should be included in the GARP as a strategic objective as this would further support the UNESCO bid.

7. Ancillary and Typographical Errors

Correct an error concerning the name of the Adelaide Park Lands in the “Infrastructure Considerations” section, where the advisory board “Kadaltilla” is incorrectly referenced in relation to the Adelaide Park Lands.

Recommendation:

- On page 282, in the “Infrastructure Considerations” section, revise the sixth paragraph to state, “The Adelaide Park Lands are...”.

8. Conclusion

Kadaltilla believes that the Greater Adelaide Regional Plan offers a valuable opportunity to shape a sustainable future for Adelaide, one that recognises the importance of the Adelaide Park Lands as a global, cultural, environmental, and recreational asset. However, we urge the Commission to consider the following recommendations:

- **Strengthen and clarify the commitment of the draft GARP to the Adelaide Park Lands** by using consistent language that aligns with the APLMS.
- **Consult with Kadaltilla/Adelaide Park Lands Authority** on any changes to governance or funding of the Adelaide Park Lands.
- **Clarify the boundaries of State Significant Infill Areas** to prevent any potential threat to the integrity of the Adelaide Park Lands.
- **Elevate biodiversity and ecological resilience** as core components of the Adelaide Park Lands' role in the region's climate strategy.
- **Prioritise design-led responses** to ensure sensitive, sustainable urban growth that enhances the character and values of the Adelaide Park Lands.
- **Support the World Heritage Bid and Heritage Place** with specific strategies that align with heritage conservation efforts.

Kadaltilla remains dedicated to collaborating on these important issues and looks forward to working with the Commission to ensure the Adelaide Park Lands are protected and enhanced for future generations.

