

31 October 2023

Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

Dear Madam or Sir

Comments on EPBC No. 2023/09606 New Women's and Children's Hospital, Adelaide Park Lands

Australia ICOMOS welcomes the opportunity to comment on this highly significant project. Our interests lie in the management and protection of heritage values and while the merits of the new hospital are not themselves debatable, we are particularly concerned with an apparent lack of sensitivity given to impacts on both National and State heritage values. The level of these impacts, as provided in Appendix 4 of the Referral documentation, and discussed below, makes the current choice of location unprecedented in a project that has reviewed multiple options for the location of the new hospital.

Our comments below respond primarily to Appendix 4 of the referral documentation: *Dash Architects - National Heritage Impact Assessment, New Women's and Children's Hospital Project, DA214098 Issue M, 14/07/2023*. This work is referenced below as the NHIA.

We particularly note that the conclusion of the NHIA (p. 115) is that the proposed new 10 storey hospital and 7 storey (above ground) carpark structures have the potential to result in a significant impact on the landscaped character of the Adelaide Park Lands to an unacceptable level, and we support this assessment.

We recognise and endorse the NHIA list of potential significant impacts on the outstanding heritage values of the Park Lands, which cumulatively are not acceptable.

When assessed against the SIG 1.1 Guidelines it was found that the proposed new Women's and Children's Hospital within Park 27 (Tulya Wardli) (and surrounding excised land) has the potential to result in significant impacts to the National Heritage values of the Adelaide Park Lands and City Layout:

- Physical expression of Light's 1837 Adelaide Plan
- Legibility of encircling Park Lands
- Definition of the inner and outer park lands boundary
- Landscaped Character
- Diversity of use of the place for recreation, sports, events and meeting spaces. (NHIA p. 119)

We offer more particular comment as follows.

1. **LOCATION SELECTION:** The NHIA notes that the Site Issues working group advised the Review Group of,

costs and time frames to provide site clearances for Options 2 through 4, including consideration of "The extent of planning, heritage and other approvals and their complexity for each option". On advice it is understood these considerations included National Heritage matters at a high level. (p. 24)

The chosen location appears to not support this level to attention to heritage values as a contributory factor. Of concern more particularly is the statement that,

The exclusion of the existing SAPOL building compound land from the boundaries of the National Heritage place was one of the contributing factors in selecting the current site for the proposed development. (NHIA p. 101)

The fact that the SAPOL site is included on the South Australian Heritage Register should suggest the opposite approach. The identified value of the Barracks site makes it of high significance to the people of South Australia and an important place for the history of the State. To suggest that the only heritage values that need to be considered are those at the National Heritage Level does not give due respect to those places listed as otherwise significant, and serves to exacerbate the significant impact already identified for the National Heritage values. It is contradictory to any approach to best-practice heritage management.

2. **LACK OF A HERITAGE MANAGEMENT PLAN:** While National Heritage listing does not make the preparation of a Heritage Management Plan (HMP) mandatory, a HMP is essential in the context of significant development proposals and potential impacts on heritage values. It is understood that a HMP is in preparation for the Adelaide Park Lands, but to have progressed to this stage of the hospital project without such a document reinforces constraints in responsibly protecting the heritage values of the Park Lands. The HMP would consider all the heritage values of the Park Lands, not just those identified in the National Heritage listing. It would also allow an assessment of multiple issues, actions, and cumulative impacts. This is particularly concerning in the light of more than 15 previous referrals under the EPBC Act since 2008 following the National Heritage listing (NHIA p. 84), and the threats are reiterated in the NHIA,

There is potential for some cumulative impacts from these and other developments in the Park Lands to have an adverse impact on the National Heritage values of the place, such as:

- long-term impacts on views and vistas, as identified in the listing
- alienation of the Park Lands that may limit community access
- an imbalance in uses that may affect its landscape character
- encroachments to the grid layout that may affect the integrity of the overall plan. (p. 84)

We acknowledge and support that the complexities and tensions in reconciling changes in use of the Park Lands, especially from 'recreational' to 'utilitarian', will be better managed and balanced through an HMP. In the interim we support the recognition in the NHIA that,

While utilitarian uses (and their associated character) remain intrinsic to the National Heritage values of the Park Lands, the 2008 National Heritage listing should be considered a turning point in balancing the impact of these uses on the open space characteristics recreational use and landscaped character of the Park Lands. *The National Heritage listing's emphasis on these latter 'recreational' characteristics should be given greater weighting.* (p. 78, italics added)

3. **NHL BOUNDARY:** The 2008 boundary of the National Heritage listing of the Park Lands definitively excluded all historical structures that were inconsistent with the outstanding heritage values of the Park Lands. The referral argues that the Park Lands have seen a previous variety of uses and public or commercial buildings, including hospitals, and hence the current proposal is consistent with the history of the site. However, this argument stands in contradiction to the National Heritage listing's categorical exclusion of such encroachments as not being contributory to the National Heritage values of the Park Lands. Furthermore, the NHIA reinforces the point,

While buildings within the Park Lands are not uncommon, they are generally of a low scale and maintain the 'open' landscape character of the Park Lands that stand in contrast to the built up areas of the City and surrounding suburbs.' (p. 6)

This approach also ignores the history of this development that has apparently seen,

'From the 1980s the pace of development accelerated, although the pattern remained *re-utilisation of land being relinquished by another user, rather than intrusion into green space*'. (p. 56, italics added)

It is evident that the proposed project is neither consistent with National Heritage values nor reflective of the design or siting policies of previous approaches.

4. **FUTURE HOSPITAL EXPANSION:** In recognition of the threat of cumulative impacts, it is self-evident that the construction of the hospital in its current position also delivers support for future hospital expansion needs. This will most likely result in a further incursion on the Park Lands and additional impact on the listed heritage values of the Park Lands. Should this project proceed in the current location then the reduction of future impacts should be considered now as part of the decision making processes.

5. **EPBC CONSIDERATION OF IMPACTS INSIDE AND OUTSIDE THE NHL BOUNDARY:** The referral documentation also consistently notes that only a portion of the hospital development intrudes into the National Heritage listed area. However, this neglects one of the strengths of the EPBC Act, which is its consideration of impacts to heritage values that arise outside the NHL boundary. As such, impacts should be considered for the hospital development as a whole, which is particularly concerning on the basis of landscape and visual impacts. This is confirmed in the NHIA,

the introduction of a new 10-storey hospital building will notably change the built form character of the locality when viewed in the broader context, and in particular the 'open' landscape characteristics of the encircling Park Lands along the important Port Road thoroughfare...

The scale of the proposed hospital building will result in a notably larger visual presence of built form within the encircling Park Lands that will be visible from not only the length of Port Road, but also surrounding parks. (p. 99)

The indicative renders provided on pages 102-103 of the NHIA confirm that the form and height of the development will be highly intrusive.

6. **CAR PARK:** The NHIA (p. 5) discusses the carpark structure, and highlights the potential to compromise the heritage values of the Park Lands:

- This land remains within the boundary of the National Heritage place.
- Development of and the associated reduction of landscaped open space has the potential to diminish the legibility of the encircling Park Lands in this location.
- The new carpark and hospital buildings will be significantly larger in scale and height to the existing historic encroachments within this locality and will have a greater visual prominence within both the immediate and broader context.
- Historic encroachments have already diluted the legibility of the encircling Park Lands in this locality.
- Larger, taller and additional structures have the potential to further compromise this legibility within the immediate and broader locality.

In the NHIA discussions relating to potential mitigation, the proposed car park façade treatment is identified as the area where predetermined 'project fundamentals' may have been positively amended and developed following the engagement of Dash Architects to assist the project (NHIA p. 6). Although the NHIA also notes,

[The carpark's] size, siting and orientation to the Port Road thoroughfare out of the City will result in a building of very high visual prominence, despite proposed façade design measures that go some way to mitigating such impacts. (p. 6)

The inclusion of a highly visible, 7-storey car park will clearly impose a huge and detrimental impact on the Park Lands.

7. **COMMUNITY AND SOCIAL VALUES:** We note this is an area of the NHIA and the referral in general that is less well developed. This concern relates most particularly to associative values and we dispute the conclusion that longevity of conservation and protection of Park Lands, and association with community groups that campaign for its protection and accessibility (Criteria (a) & (g)), are not affected by the proposed works (NHIA, p. 101). A more exploratory understanding of heritage values attributed through social value, associations and 'sense of place' would recognise attachments to place, activities and practices – including activities to lobby and protect a place, and uses of places for recreational purposes – as being significant for the Park Lands and under threat of impact from this development. The NHIA (p. 46) recognises that the key components having social or cultural values for the Park Lands include:

- It is fundamental to the character and ambience of the city.
- Acknowledgement by many South Australians as having outstanding social value, and access by many on a regular basis for a variety of activities, sport, recreation, destinations or events.
- The social significance of the Park Lands has evolved over time with different uses.

How these values, and attributes, could be potentially impacted appears not to have been explored in an informed way, and there is a noticeable lack in the referral documentation of a community consultation report that considers either social values or public community opinions and feedback. While it is understood from Section 1.2.7 of the referral document there has been some consultation,

the lack of a report on these outcomes is concerning, particularly in relation to the potential impact on both State and National Heritage values.

8. **INDIGENOUS VALUE AND ARCHAEOLOGY:** Following Point 7, we further note a lack of reporting on Indigenous values. While it is noted that there is an Aboriginal Advisory group (Section 1.2.7), there is no clarity as to what matters have been considered important by this group – and how they have been taken into account – and it appears that no formal heritage assessment has been undertaken for potential Indigenous heritage values. This is a significant omission in this referral documentation and should be rectified. Included in this assessment would be an engagement with potential archaeological values: the potential for Indigenous or historical sub-surface material appears not to have been part of heritage considerations. It is not possible to comment on the potential to impact features or material that may contribute to the National Heritage values without this understanding. Clearly a full recording of the structures and sub-surface material at the Barracks would be essential.
9. **CONTROLLED ACTION:** In the event the proposed hospital project is not relocated, there are a number of mitigation recommendations provided in the NHIA that we strongly urge be included as activities under a Controlled Action, with more detailed information provided for each:
 - I. Further details of proposed stormwater outlet: The design of the proposed site stormwater outlet to the Torrens outfall should minimise any physical and visual impacts to the landscape qualities of the affected area.
 - II. Further design development of the hospital, carpark and central energy plant buildings: The design development of the proposed buildings should seek to mitigate their visual scale and prominence within its Park Lands setting. Any further increase in footprint within the boundaries of the National Heritage place should generally be avoided. Façade treatments should utilise materials and colours that are compatible with its Park Lands setting (natural colours) while façade modelling should remain highly articulated to mitigate its visual prominence within its setting.
 - III. Landscape screening: Landscape design and plant selections used for screening buildings should be mature selections, and suitable for their intended use and location.
 - IV. Any tree removal should be kept to a minimum and not impact the overall landscape qualities of the affected areas of Park Land.
 - V. Further design development of public realm and pedestrian/cycle connections: The design development of the project's public realm, including pedestrian/cycle connections should ensure high levels of public amenity and site connectivity are achieved, and that they are sensitive to the heritage values of the Park Lands.

In addition, we recommend that a Controlled Action should provide for the further studies identified under Points 7 and 8 above.

– ooOoo –

Australia ICOMOS urges that reconsideration be given to the current project and recommends that an alternative location be found that does not significantly impact both National Heritage and State heritage values, noting that there is considerable evidence in the NHIA that the proposed action could be deemed to have a Clearly Unacceptable impact on protected matters under the EPBC Act. If this is not to be pursued then we strongly urge the project become a Controlled Action with further details and assessment provided to DCCEEW for consideration.

We are happy to provide further comment should that be requested.

Yours sincerely



**Professor Tracy Ireland, M.ICOMOS, FSA
President**