ADELAIDE PARK LANDS MANAGEMENT STRATEGY REVIEW

Thank you for the opportunity to comment on the review of the Adelaide Park Lands Management Strategy. I provide this letter as a submission on behalf of Australia ICOMOS.

ICOMOS – the International Council for Monuments and Sites – is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an advisory body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS, formed in 1976, is one of over 100 national committees throughout the world. Australia ICOMOS has over 600 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees, as well as on expert committees and boards in Australia. We have a particular interest in Australia’s world and national heritage places.

Heritage Listing and Values
There is a disconnect between the National Heritage listing (NHL) of the Adelaide Park Lands and City Layout and the Adelaide City Development Plan in terms of physical area and language. The national listing is only mentioned in the preface of the Development Plan and the boundary of the listing does not relate to zonings and policies. The NHL boundary of the Park Lands is split into four zones (Park Lands, City Frame, Capital City and North Adelaide Historic Conservation), therefore has different management objectives. The risk is that the values of the Park Lands may not be consistent with planning policies in some zones.

The National Heritage listing of the Park Lands, Criteria D - Principal characteristics of a class of places, notes the “judicious siting and wide streets maximised views and vistas through the City and Park Lands and from some locations to the Adelaide Hills” (Appendix B in Strategy). Australia ICOMOS is concerned about the potential accumulative adverse impacts on views and vistas to and from the Park Lands in relation to development of the inner-city rim (beyond the city) where some development proposals are non-complying (i.e. over-height provisions in local Development Plans). The process for consideration of development and potential impacts on national heritage values under the Environment Protection and Biodiversity Conservation Act 1999 is proponent driven. With a lack of triggers in local or state planning provisions to consider development affecting national heritage places ‘in the vicinity’, there is a risk that individual development proposals will not consider potential impacts on the Park Lands views and vistas, and for accumulative development along the outer or inner fringe of the Park Lands, where it is approved over existing height provisions, to lead to adverse impacts on the place’s national heritage values.

Australia ICOMOS recommends that a view and vistas study is undertaken for the Adelaide Park Lands to help identify significant views and vistas, both to and from the Parklands, and to provide guidance on development in the vicinity of the Park Lands national listing.
Furthermore, local planning provisions should be amended to make reference to development in the vicinity of statutory National, Commonwealth and World Heritage places, not just State Heritage Places, requiring consideration of heritage impacts on the heritage place and its setting. The definition of setting may not be fully understood by various stakeholders. The Australia ICOMOS *Burra Charter* defines setting as “the immediate and extended environment of a place that is part of or contributes to its cultural significance and distinctive character” (Article 1). The *Burra Charter* further explains that “Setting may include: structures, spaces, land, water and sky, the visual setting including views to and from the place, and along a cultural route; and other sensory aspects of the setting such as smells and sounds. Setting may also include historical and contemporary relationships, such as use and activities, social and spiritual practices, and relationships with other places, both tangible and intangible” (Article 1.12).

Some World Heritage List places include a buffer zone, which is a visual catchment where development is considered in terms of potential impacts on heritage values (i.e. Old Government House in Parramatta, Sydney Opera House). A report was prepared in 2012 to help guide development in Parramatta CBD in consideration of the impacts on Old Government House and the Domain’s world and heritage values. It is recommended that a buffer zone around the Park Lands is established, so that development in the vicinity is considerate of the National Heritage values.

The National Heritage listing of the *Adelaide Park Lands and City Layout* does not include the natural and cultural heritage values of the Park Lands. Australia ICOMOS is not certain if this was originally assessed but recommends that it is considered as part of the appropriate management of the place’s diverse values. For instance, it is noted that areas in the Park Lands have dual Indigenous names, which is recognition of their history and identity to Indigenous peoples. However, recognition of the cultural heritage values of the Park Lands should be part of the listing and management structure.

The Park Lands as a place is not listed on the State Heritage Register in South Australia, which means that with no triggers under local or state planning provisions to consider national heritage values, development in the vicinity of the Park Lands is not sufficiently considered and managed. Recognition of its state heritage values is important to the local community and should be further investigated and supported. Any new or revised listing for the Park Lands should consider its diverse heritage values.

**New Development and Infrastructure**

The Park Lands are a key element and integral to Colonel Light’s plan of Adelaide. Of national cultural heritage value, the spaces comprising the Park Lands should be protected from further built form intrusion in order to retain the cultural value of the place for future generations. In terms of town planning history, Adelaide’s design is of world standard and a rare example of a city divided and encircled by a ring of parklands.

Consequently, the Adelaide Park Lands’ main objective and future management decisions should be driven by:

- the minimisation of permanent structures to only those for community recreational or cultural use,
- avoidance of invasive transport infrastructure
- the removal of obsolete buildings, and
- the reduction of both temporary and permanent car parking facilities. Policies should be strengthened around reducing car parking and no new permanent hardstand areas should be introduced.

The integrity of the Park Lands should be not exempted from the Crown or subject to ‘impact assessed’ or streamlined as part of ‘essential infrastructure’ approval paths, all of which may undermine the protection and value of the Park Lands. Early planning considerations for any development that is likely to impact on the Park Lands directly or indirectly (development affecting) should consider the place’s national heritage values.

**Diverse Uses**

The Park Lands have a variety of uses, which is supported and cherished. There is some concern about non-community based sporting uses of the Park Lands and requirements for associated fencing, clubrooms and signage. Improved links between the Development Plan guidelines and the Adelaide Park Lands Management Strategy is recommended (i.e. corporate signage on temporary event fencing does not comply with Development Plan guidelines).
Interpretation

Interpretation of the Park Lands does not just mean physical interpretation (i.e. plaques and signs). There are opportunities for walking tours or tracks, historical talks, website, various brochures and signs, and self-guided audio tours (to be considered with wireless technology) for the Park Lands.

Australia ICOMOS recommends the preparation of an Interpretation Plan, which would guide all of the values of the Park Lands, not just heritage values. This document would provide policies, strategies and advice on interpreting the natural and cultural heritage of the Park Lands, based on research and analysis.

Thank you again for your consideration of the views of Australia ICOMOS in this important issue.

Yours faithfully

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