



National Heritage Impact Assessment

New Women's and Children's Hospital
Project

DA214098 Issue M

14.07.2023

*dash*architects

1.0	Introduction	8
1.1	Purpose of this Report	8
1.2	Copyright	9
1.3	Key Abbreviations	9
2.0	Project Overview	10
2.1	Core Project Components	11
2.2	Infrastructure Project Components	12
2.3	Temporary Works	12
2.1	Architect's Design Statement	17
2.1	Consequential Works	19
3.0	Overview of National Heritage Matters	19
4.0	Site Location and Description	22
4.1	Site Selection Process	22
4.2	Site Description	23
5.0	National Heritage Listing Details	33
5.1	National Heritage Listing	33
5.2	Management of National Heritage Place	34
5.3	National Heritage Values	35
5.4	Summary of Heritage Attributes	48
5.5	Condition and Integrity of National Heritage Place	49
6.0	Overview History of National Heritage Place	49
7.0	Hospitals and Healthcare Context	58
7.1	Hospitals and Healthcare in the Park Lands	58
7.2	Overview History of Women's and Children's Hospital	62
8.0	Context of Affected Locality	64
8.1	Overview History of Affected Locality	64
8.2	Integrity of Affected Locality	75
8.3	Use and Accessibility	77
8.4	Landscape Character	79
9.0	Summary of Obligations under the EPBC Act	81
9.1	EPBC Act / SIG 1.1 Guidelines	81
9.2	SIG 1.1 Definitions	82
9.3	Cumulative Impacts	84
9.4	Self-Assessment & Referral Process	85
10.0	National Heritage Impact Self-Assessment	86
10.1	Step 1: Proximity	86
10.2	Step 2: Impact Assessment	88
10.3	Step 3 Mitigation	101
10.4	Step 4: Significance of Impacts	108
10.5	Step 5: Referral Requirements	116
11.0	Summary of Findings and Recommendations	118
12.0	Bibliography and References	122

Executive Summary

Purpose

The 'Adelaide Park Lands and City Layout' was inscribed on the National Heritage List by the Commonwealth of Australia in 2008 under the *Environmental Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act). In broad terms, the EPBC Act requires any person undertaking an action to a National Heritage place that may result in a 'significant impact' to undertake a self-assessment in order to determine whether a Section 68 referral to the Minister (responsible for the Act) is necessary. Any referral will then be assessed by the Department of Climate Change, Energy, the Environment and Water (Com) (DCCEEW) to determine whether the action is:

- Clearly Unacceptable
- Controlled Action
- Not a Controlled Action – Particular Manner, or
- Not a Controlled Action.

The purpose of this NHIA is to inform the self-assessment process to inform whether a Section 68 referral under the EPBC Act is warranted. Importantly, this assessment does not consider whether or not the Action should be considered Clearly Unacceptable, Controlled, or otherwise. The responsibility for this subsequent assessment remains vested with DCCEEW.

A large portion of the Project Site accommodates the existing building compound of the South Australian Police (SAPOL) 'Thebarton Barracks' facility. This building compound is on land that has been excised from the National Heritage listing, but is bound to the east, north and west by National Heritage listed Park Lands. The Project Site also extends into portions of land that fall inside the boundary of the National Heritage listed Adelaide Park Lands and City Layout'.

Core components of the new Women's and Children's Hospital include:

- A 10 storey (with roof plant) hospital building located mostly within the footprint of the SAPOL land, but also extending northward into the boundary of the National Heritage place.
- A 8 storey carpark structure (7 storeys above ground) with a footprint of around 5,100sqm
- A 2 storey central energy plant
- Landscaping and a new playground area
- Upgrades to Port Road
- Services and stormwater upgrades
- Temporary works

Use

The use of the Park Lands to accommodate "Hospital" facilities dates back to the earliest days of the Colony. A "Hospital" was identified within the eastern Park Lands of Light's 1837 Plan of Adelaide while other similar uses have included the "Emigrant Location", women's destitute asylum, 'Native location', Adelaide Lunatic Asylum, and the Royal Adelaide Hospital. While the

Women's and Children's Hospital has not historically been located within the Park Lands, it has had a direct spatial relationship with them.

Accordingly, the use of the proposed section of Park Lands for a new hospital is not significantly at odds with historic pattern of encroachments and existing land uses.

Integrity of Affected Locality

The eastern end of Park 27 (Tulya Wardli) has been subject to more utilitarian uses and encroachments than most other perimeter portions of Adelaide Park Lands. Its location along the historically important connection to Port Adelaide has likely been a significant contributing factor. For over a century development along Port Road through the Park Lands effectively bridged the otherwise continuous Park Land green belt encircling the City. Consequently, the integrity of the encircling Park Lands in this location remains compromised and vulnerable. This is particularly the case for the land within the immediate proximity of the Project Site. Historic encroachments to the north of North Terrace resulted in large areas of Light's original Park Lands being excluded from the National Heritage listing in 2008. This includes large areas of the project site and surrounding Park Lands.

National Heritage Impact Assessment

The National Heritage Values of the Adelaide Park Lands and City Layout are complex. An analysis of the National Heritage listing by DASH Architects as identified the following attributes that in our opinion embody these values:

- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- defined inner and outer boundary
- legibility of encircling Park Lands
- six town squares
- streets in a grid pattern, hierarchy and width of streets
- publicly accessible open space
- formal organisation, delineation and dedication of the Park Lands space
- diverse landscape character including formal designed plantings, gardens and areas, informal landscapes and open bushland
- diverse use of the place for recreation, sports, events and meeting spaces
- range of important civic, public, and cultural assets and institutions within the Park Lands
- longevity of conservation and protection of Park Lands
- association with community groups that campaign for its protection and accessibility
- association with Colonel William Light

This NHIA is undertaken in accordance with the Australian Government

Department of Climate Change, Energy, the Environment and Water (DCCEEW) publication 'Matters of National Significance, Significant Impact Guideline 1.1' (SIG 1.1 Guidelines). These guidelines provide a step-by-step process structured as a series of questions to determine whether a "significant impact" to the National Heritage values of the place may arise from the proposed action. This process includes consideration of mitigation measures used to minimise or avoid heritage impacts. The proposed new Women's and Children's Hospital project integrates a range of mitigation measures that were found to be successful in minimising a number of the impacts of the project on the National Heritage Values of the place, particularly with regards to its Landscape Character.

A number of key mitigation measures undertaken by the Project Design Team, including:

- A 50m landscape buffer is being provided to the Port Road interface of the new Hospital building (and approx. 25m for the carpark) that will improve the legibility of the Park Lands belt along this important Port Road interface.
- The new hospital building has been set out and designed to respond to the Park Lands setting and reduce its visual prominence.
- The proposal restores public access to 24,000m² of Park Lands at Kate Cocks Park, approx. 11,000sqm of land excised from the National Heritage listing adjacent the Adelaide Gaol, and 8,100sqm of land along Port Road and around the new carpark. The reclamation of Kate Cocks Park and land around the gaol environs will form part of the accessible recreational facilities for families associated with the new facility, enhancing recovery and wellbeing and improving the Park Lands setting.
- The screening of the eastern and southern façades of the carpark building to visually soften their setting within the Park Lands
- Significant upgrades to pedestrian amenity within the affected environs
- Significant upgrades to pedestrian / cycle connections through and area that is presently unwelcoming and difficult to access by the public.
- Improved vehicular access to the area, and in particular the historically important Old Adelaide Gaol
- Extensive additional landscaping within an area of Park Lands that is in generally poor and unmaintained condition

This NHIA also recommended consideration of the following additional mitigation measures that we understand have been agreed by the project team.:

1. 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.

2. 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 be generally 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.

3. Landscape screening

Landscape design and plant selections used for screening buildings should be mature selections, and suitable for their intended use and location.

4. Temporary works to roadway in Bonython Park

Existing roadways through Bonython Park used to provide temporary access should maintain their current general configuration (free of kerbs, defined by timber bollards). Any tree removal should be kept to a minimum and not impact the overall landscape qualities of the affected areas of Park Land.

5. Port Road design

Further design development of the proposed Port Road upgrades should provide high levels of pedestrian amenity. Any perimeter landscaping removed to facilitate widening should be replanted to maintain the Park Lands setting of the thoroughfare.

6. Landscape remediation following construction

All areas of Park Lands affected by temporary works are to have their landscaping remediated upon completion of the project to ensure the landscape qualities of the Park Lands are maintained.

7. 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.

This Heritage Impact Assessment has concluded that while the project may result in impacts to 7 of the 13 attributes identified as embodying the heritage values of the place, only 4 of these had the potential to result in "significant" impacts as defined by the SIG 1.1 Guidelines.

These four attributes were:

1. Physical expression, integrity, legibility, and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography.
2. Defined inner and outer boundary.
3. Legibility of encircling Park Lands.
4. Landscaped Character.

Of these four, the first three have been grouped together for the purposes of the discussion below.

Physical expression of Light's 1837 Adelaide Plan / Legibility of encircling Park Lands / Definition of the inner and outer park lands boundary

The affected area of the proposed development has been subject to significant historic encroachments since the surveying of the City itself. Its proximity to the important Port Road connection is likely a significant contributing factor. These encroachments include the existing 2 to 3 storey SAPOL Thebarton Barracks facility, built within very close proximity to Port Road (through the Park Lands). This site, along with other historic encroachments such as the Adelaide Gaol and rail corridor, have diminished the legibility of the Park Lands in this locality to such an extent that large areas of Light's original Park Lands along Port Road have been excised from the boundary of the National Heritage place.

Mitigation measures incorporated by this project do address several of the existing and potential impacts on the legibility of the Park Lands in this locality. In particular, the 50m setback of the new buildings from Port Road (through the Park Lands) and inclusion of landscaped buffers improves the legibility of the Park Lands belt along this important thoroughfare when compared to the existing condition.

While the land of the proposed new carpark structure is generally of low integrity and largely disconnected from its surrounds by historic encroachments, it nonetheless provides some legibility to the original extent of the encircling Park Lands. Notably, this land remains within the boundary of the National Heritage place. Development of this land with a new carpark, 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.

The legibility of the encircling Park Lands is defined by the contrast of development along its inner and outer edge to the open landscape characteristics within. Historic encroachments have already diluted the legibility of the encircling Park Lands in this locality. Their redevelopment with larger, taller and additional structures has the potential to further compromise this legibility within the immediate and broader locality.

Landscape Character

The landscape character can also be considered in two contexts:

- Localised Context: The landscaped character within the local context such as that observed by a person travelling through or using the space, and
- Broader Context: the landscaped character of the Park Lands when observed from afar. This could be from other areas of the Park Lands, the City or surrounding suburbs, or even when flying over or from Mt Lofty.

The contrasting open character of the Adelaide Park Lands differentiate them from the built edges of the City and surrounding suburbs. This 'openness' is intrinsic to their landscape character within the broader context.

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.

While much of the landscape character of the project area could best be described as generally poor, inaccessible, under-maintained and un-landscaped, the hospital building encroachment (including its loading bay) into the listed Park Lands, along with the proposed new carpark and central energy plant, will preclude the rejuvenation of these areas in a manner more consistent with the National Heritage values of the place.

While the project will result in large areas of the affected land being relandscaped in a manner that is both desirable and consistent with the National Heritage values, the visual impact of the new structures on the landscape character of the Park Lands has the potential to be significant. Despite the land of the SAPOL building compound falling outside of the boundary of the listing, it remains encircled by the National Heritage listed Park Lands.

The new hospital building and carpark will be visible from a significantly greater area than the existing SAPOL facilities, and has the potential to impact on the 'open' landscape character of the surrounding Park Lands within the broader context.

This is similarly the case for proposed new carpark, except in this instance the new building is located within the boundaries of the National Heritage Place. Its 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. Like the hospital building, the new carpark structure within the encircling Park Lands belt and has the potential to reduce the sense of 'openness' associated with the landscape character of identified National Heritage importance within the broader context.

These attributes are associated with the following identified National Heritage values of the place:

- Criterion (a)** The place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.
- Criterion (b)** The place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.
- Criterion (d)** The place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of: (i) a class of Australia's natural or cultural places; or (ii) a class of Australia's natural or cultural environments.
- Criterion (f)** The place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.
- Criterion (g)** The place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.
- Criterion (h)** The place has outstanding heritage value to the nation because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history.

The Self-Assessment undertaken by this report against the SIG 1.1 Guidelines step-by-step process concluded that a referral under Section 68 of the EPBC Act in relation to potential 'significant impacts' to the National Heritage values of the Adelaide Park Lands and City Layout is necessary and recommended.

1.0 Introduction

1.1 Purpose of this Report

DASH Architects has been engaged by URPS to prepare a National Heritage Impact Assessment (NHIA) of the proposed new Women's and Children's Hospital (nWCH) development on North Terrace, Adelaide.

The development site ('Project Site') is located at the eastern end of the Adelaide City Park Land Park 27 (Tulya Wardli). The site contains portions of land that fall inside the boundary of the National Heritage listed Adelaide Park Lands and City Layout', which was inscribed in 2008 under the *Environmental Protection and Biodiversity Conservation Act 1999* (Com) (EPBC Act). A large portion of the Project Site accommodates the existing building compound of the South Australian Police (SAPOL) 'Thebarton Barracks' facility. This building compound is on land that has been excised from the National Heritage listing, but is bound to the east, north and west by National Heritage listed Park Lands.

In broad terms, the EPBC Act requires any person undertaking an action to a National Heritage place that may result in a 'significant impact' to undertake a self-assessment in order to determine whether a Section 68 referral to the Minister (responsible for the Act) is necessary. Any referral will then be assessed by the Department of Climate Change, Energy, the Environment and Water (Com) (DCCEEW) to determine whether the action is:

- Clearly Unacceptable
- Controlled Action
- Not a Controlled Action – Particular Manner, or
- Not a Controlled Action.

The purpose of this NHIA is to inform the self-assessment process to inform whether a Section 68 referral under the EPBC Act is warranted. Importantly, this assessment does not consider whether or not the Action should be considered Clearly Unacceptable, Controlled, or otherwise. The responsibility for this subsequent assessment remains vested with DCCEEW.

This NHIA is undertaken in accordance with the Australian Government Department of Climate Change, Energy, the Environment and Water (DCCEEW) publication 'Matters of National Significance, Significant Impact Guideline 1.1' (SIG 1.1 Guidelines). As would reasonably be expected, projects of this size and complexity are continually being refined and updated throughout their delivery. This NHIA has been prepared in May 2023, and has been based on the following project information available and provided to DASH Architects at the time:

- Internal Haul Roads and Pedestrian Access— Main Works (MW01/MW02/ MW03/MW04)
- New Women's and Children's Hospital – The Barracks Site Master Plan, 1 March 2023, Heritage Assessment
- nW&CH MP Parklands Site (The Barracks) Landscape Scope of Works

VK

- Draft Integrated Masterplan
- Works Beyond EOW Boundary
- Works Within EOW Boundary (13 drawings)
- Draft New Women’s and Children’s Hospital Master Plan, April 2023, Government of South Australia
- New Women’s and Children’s Hospital Car Park – Concept Development, 05 May 2023, A+
- New Women’s and Children’s Hospital WIP PLP, Woods Bagot (230414)
- New Women’s and Children’s Hospital, State Commission Assessment Panel Briefing (no date)

1.2 Copyright

The copyright and moral rights associated with the NHIA remain vested with DASH Architects. It may not be reproduced or used as a template for any other project without written consent.

1.3 Key Abbreviations

Key abbreviations used in this report are noted below. Key terms are defined where mentioned throughout the report.

Abbreviation	Description
K/PLA	Kadaltilla / Park Lands Authority
CoA	Corporation of the City of Adelaide
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Com)
DIT	Department for Infrastructure and Transport (SA)
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
EPBC Regs	<i>Environment Protection Biodiversity and Conservation Regulations 2000</i> (Cth)
HMP	Heritage Management Plan
NES	National Environmental Significance
NHIA	National Heritage Impact Assessment
NHL	National Heritage List
NWCH	New Women’s and Children’s Hospital
RAH	Royal Adelaide Hospital
SAPOL	South Australian Police
WCH	Women’s and Children’s Hospital

2.0 Project Overview

On 18 January 2023 the *New Women's and Children's Hospital Act 2022 (SA)* was gazetted, coming into operation the following day. The Act identified land ("Project Site") for the New Women's and Children's Hospital at the eastern end of Adelaide City Park Land's Park 27 (Tulya Wardli) (refer Figure 2).

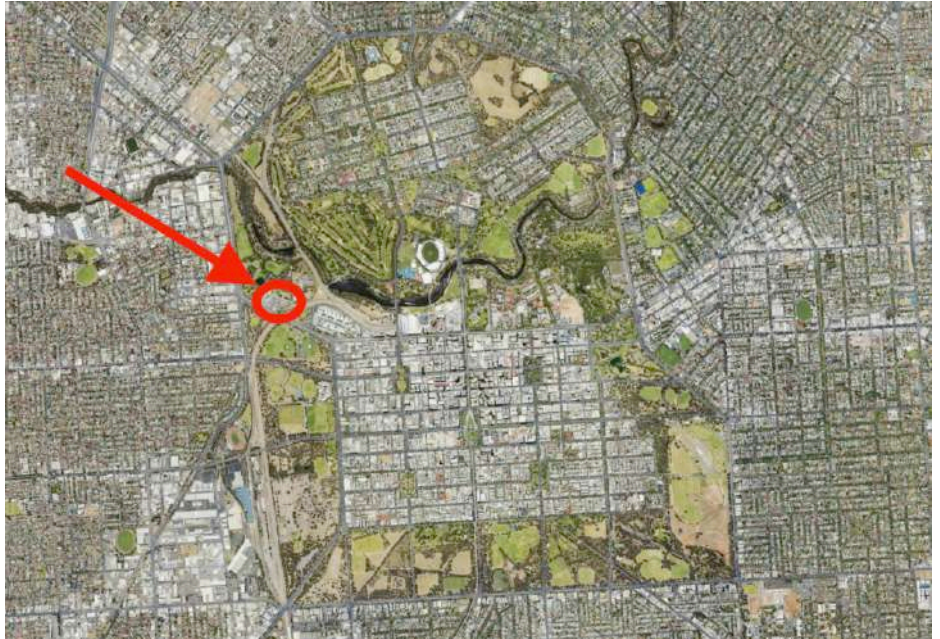


Figure 1 – Site Location Plan [Source: SAPPA, annotated by author]

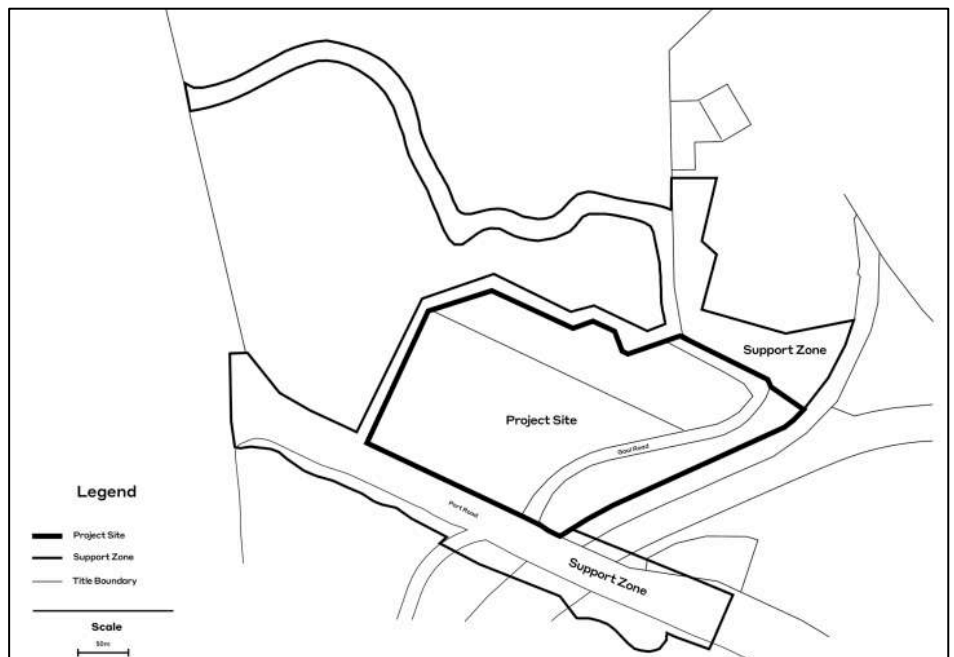


Figure 2 – Plan of project site and support zones for New Women's and Children's Hospital [Source: *New Women's and Children's Hospital Act 2022*, Schedule 1]



Figure 3 – Aerial image identifying the Project Site [Source: SAPPA, annotated by author]

A large portion of the Project Site currently accommodates South Australian Police (SAPOL) 'Thebarton Barracks' facility, including:

- building compound that consists of several buildings (offices, stables, stores and museum) and hard stand areas. This site is secured by a tall palisade perimeter fence.
- Horse training grounds and agistments. These areas have a greater landscape quality, and include the historic Kate Cocks Olive Grove.

The Government of South Australia's New Women's and Children's Hospital Draft Master Plan notes the facility *will be a leading clinical facility dedicated to improving the health and wellbeing of babies, children, young people, women and their families, as well as the diverse communities that make up Adelaide's population.*

2.1 Core Project Components

Core components of the project include:

New Women's and Children's Hospital

- A new hospital building with a podium of 6 storeys with a 10 storey (total) central upper portion.
- The majority of this building is located on the site of the SAPOL building compound, with some portions extending northward into the adjacent horse training and agistment areas.
- The new hospital building is setback from Port Road approximately 50m.

Carpark

- A new 8 storey carpark structure (7 storeys above ground) with a footprint of around 5,100sqm.
- The new carpark structure is to be located on land between the Gaol Road and the rail line on land containing remnant olive trees.

Central Energy Plant

- A new 2 storey central energy plant / fire pump structure to the north of the proposed carpark with a footprint of around 2,500sqm

Landscaping

- Approximately 19,200sqm of landscaped area, including:
 - 8,100sqm along Port Road and around the new carpark and the new hospital building
 - 11,100sqm of land of around the Adelaide Gaol environs

Accessible Land

- The reintroduction of public access to approximately 24,000sqm of Kate Cocks Park (Olive Grove), a currently secured area accommodating SAPOL agistments, and approximately 8,100sqm of land to the west of the Adelaide Gaol.

2.2 Infrastructure Project Components

Known infrastructure upgrades associated with the project include:

Port Road Upgrades

- Road widening and infrastructure works to Port Road

Gaol Road Upgrades

- Upgrades to Gaol Road through the Project Site

Stormwater

- Stormwater outlet works from the site northward to the River Torrens

Services

- New Infrastructure Services to the western side of the proposed new hospital.

2.3 Temporary Works

Construction of a project of this size and complexity, in this location, will require substantial temporary works to be undertaken to accommodate construction site activities. These works and activities are contained within the areas identified as “Support Zone” in Figure 2.

The project team have provided an indicative scoping of these works, and include:

Construction Access

- Utilising existing roadways within Park 27 (Tulya Wardli) for construction access, necessitating (on advice) selected tree removal

Haul Roads

- Temporary roadway around the proposed new hospital

Fencing

- Temporary construction fencing around the Project Site and Support Zones

Compounds

- Establishment of temporary amenities, Site Offices in selected sites across the identified Support Zone or Project Site.

Traffic Control

- Provision of temporary traffic control barriers along Port Road

Heritage Assessment.



Figure 4 – General site plan of proposed development [Source: new WCH Project]



Figure 5 – Precinct Connections [Source: new WCH Project]



Figure 6 – Annotated site plan of proposed development [Source: new WCH Project]

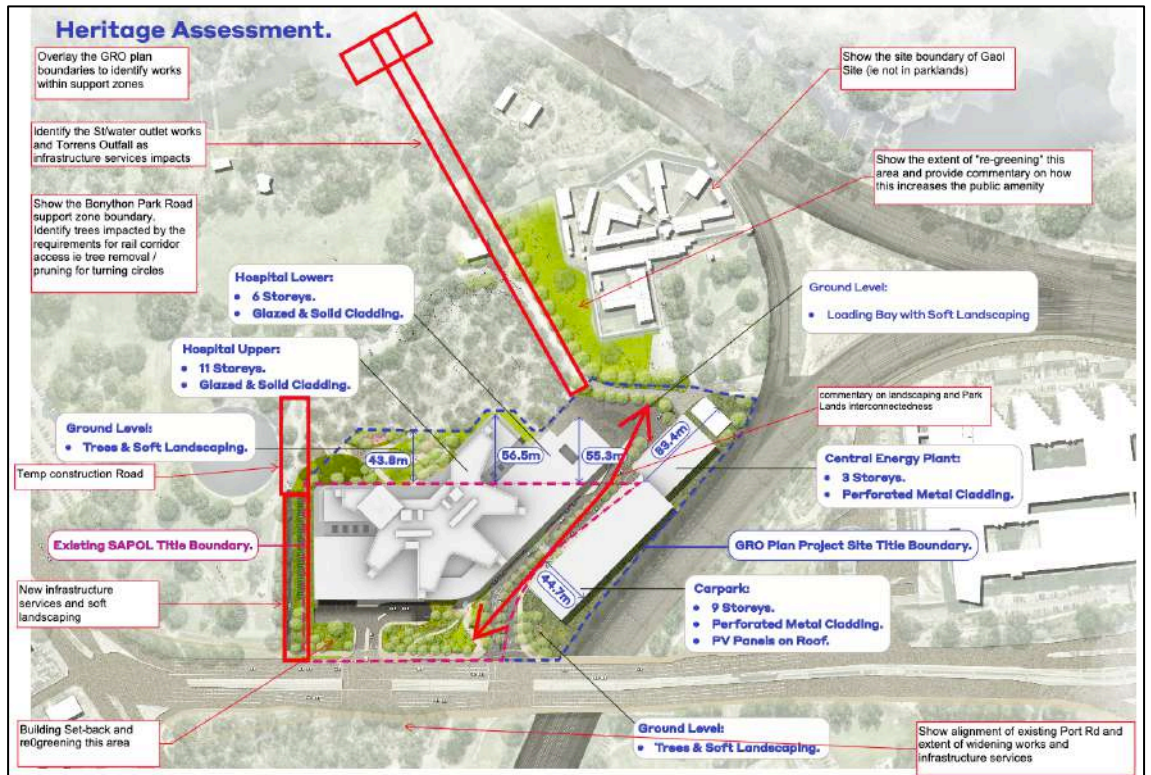


Figure 7 – Annotated site plan of proposed development [Source: new WCH Project]

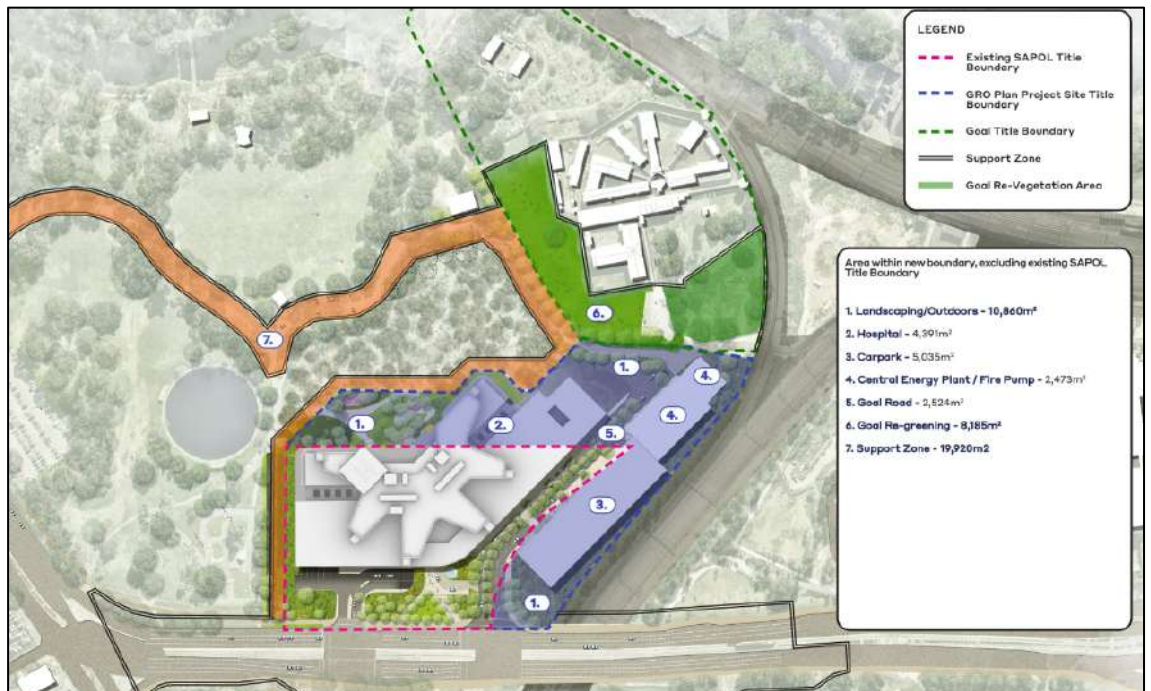


Figure 8 – Annotated site plan of proposed development [Source: new WCH Project]

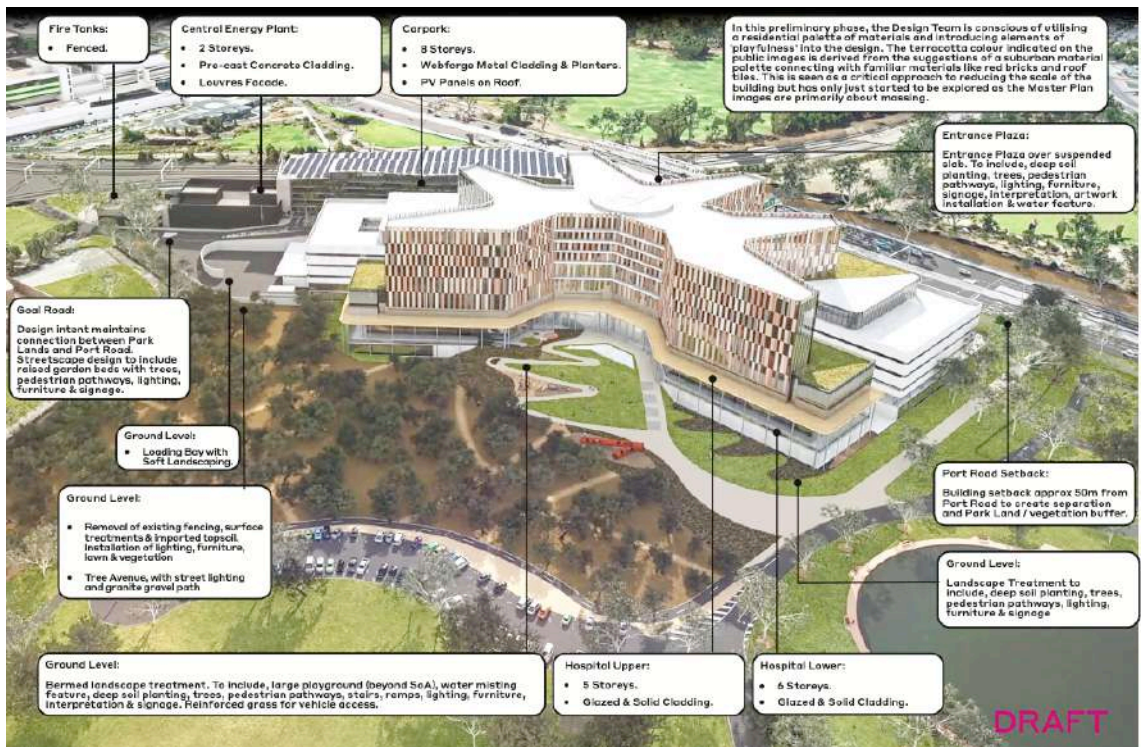


Figure 9 – Annotated 3D image of proposed development [Source: new WCH Project]



Figure 10 – Preliminary 3D imagery of proposed new Hospital Building [Source: new WCH Project]



Figure 11 – Preliminary 3D imagery of proposed new carpark [Source: new WCH Project]

2.1 Architect’s Design Statement

The following extracts relating to the projects design response to its Park Lands setting, and National Heritage values, are taken from the New Women’s and Children’s Draft Master Plan (April 2023):

National Heritage Listing - The Adelaide Park Lands + City Layout

The Master Plan design recognises the National Heritage listing of the Park Lands, responding sensitively to the setting by careful siting of the building envelope and related amenities, minimising the impact and increasing the useable outdoor green space of the Park Lands.

The Project incorporates outdoor upgrades including a Nature Play area to the north of the hospital in a previously closed-off area of the public Park Lands, making the area accessible to the public once again, bringing vibrancy and activation through this outdoor community area and play space. Clear connections are provided to the river and existing cycling and pedestrian networks.

The Project ensures improved access to and through the Park Lands by maintaining and improving existing pedestrian and cycling networks and rejuvenating previously underutilised or denuded areas. The Project recognises the significance of the site to the Kaurna Meyunna, holding prior authorisation of sections 21 and 23 of the Aboriginal Heritage Act and ongoing consultation with the Aboriginal Advisory Group and multiple stakeholder groups. An additional authorisation is being sought to cover the extra area needed on the Barracks site. The design response will continue to be developed to be sympathetic to its unique surrounds.

Urban and Civic Principles

Vision and integration of the Urban and Civic Guiding Principles associated with the New WCH Project.

The Master Plan is to:

- *Plan for a green building that is grounded in and celebrates the great urban park, the Adelaide Park Lands*
- *Create a respectful neighbour and be a catalyst for positive change*
- *Deliver seamless precinct connections for people*

Linkages with Park Lands

Greater Connection:

The Master Plan provides an opportunity to meaningfully engage with the Park Lands and create a greater connection to previously inaccessible areas.

New pedestrian and cycle networks support and strengthen the existing transport and path circulation to the hospital, as well as providing a new connection from the suburbs to the city.

Opportunities to reveal and amplify the ever present pre and post colonial history of the site is being explored to respectfully recognise the ongoing relationship of the place and site with its future use.

Heritage Response

The Master Plan provides a considered response to the National Heritage-listed Park Lands setting, configuring the building so as not to sit on Park Lands terrain, but provide direct access.

The design response will continue to be developed through subsequent stages to deliver an appropriate and sympathetic solution.

The New WCH design also delivers a respectful and sensitive response to the National Heritage-listed Adelaide Gaol. The Master Plan retains access to the Gaol, rejuvenates previously inaccessible public land adjacent the Gaol and allows view corridors to the Gaol from public areas.

The main hospital building form is pulled away from the Gaol, allowing space to view and access the site.

Connections to Park Lands

Access to the New WCH site is provided via generous pedestrian connection as well as vehicle drop-off and pick-up at the Main Entry.

The precinct design will also provide a direct link and connection through to Tulya Wardli, Bonython Park, and specifically renewed access to the Olive Grove. It provides an opportunity for the New WCH to respond to the Vision, Guiding Principles and Strategic Design Principles by providing spaces to:

- *Consider cultural gathering spaces through landscaping*
- *Celebrate Connection to Country and links with Park Lands via direct pathways through the site*
- *Consider nature and opportunities for respite and play for families and the community*
- *Plan for a green building*
- *Act as a generous neighbour and catalyst for change*
- *Deliver seamless connections for people*

2.1 Consequential Works

The *New Women's and Children's Hospital Act 2022* (SA) identified the site of the existing SAPOL Thebarton Barracks site on Port Road for the New Women's and Children's Hospital. The Act also provided for the relocation of the SA Police Mounted Operations Unit to a 'prescribed area within the Adelaide Park Lands' (Section 10(1)) noting 'No compensation is payable by the Minister, the relevant Minister or the Crown' in connection with the vesting of this land for SAPOL use (Section 10(5)).

The site selection and design for the new SAPOL Mounted Operations Unit is being undertaken separately and concurrently with the New Women's and Children's Hospital project. Potential National Heritage Impacts associated with the new SAPOL facility is likewise being assessed separately if required.

At the time of writing this Assessment the South Australian Government had announced a site for the new SAPOL Mounted Operations Unit that was not within the boundaries of the National Heritage listed Adelaide Park Lands and City Layout.

3.0 Overview of National Heritage Matters

The 'Adelaide Park Lands and City Layout' was inscribed on the National Heritage List by the Commonwealth of Australia in 2008 under the EPBC Act, as illustrated below.¹

¹ DCCEEW 2022a

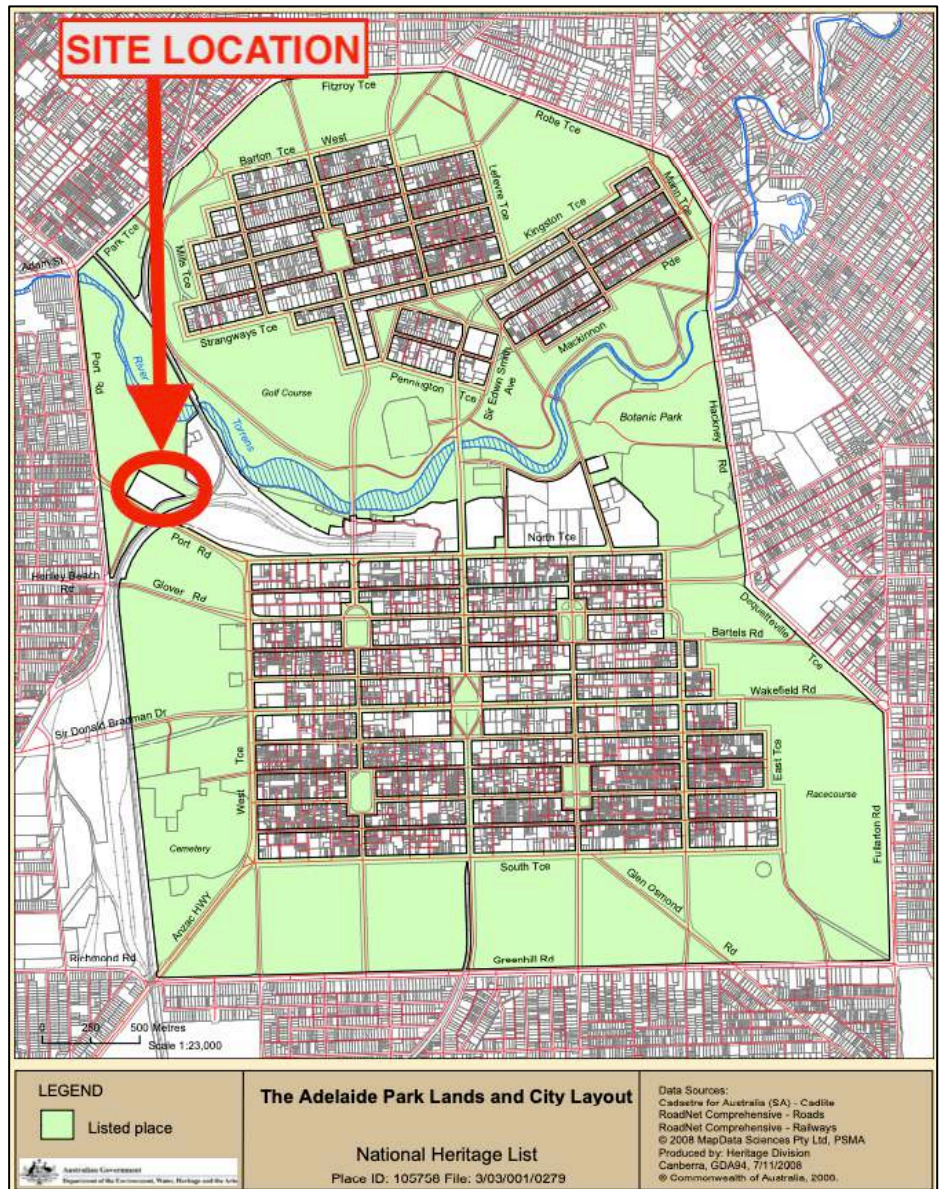


Figure 12 – National Heritage Place boundary [Source: DCCEEW 2022a]

The Project Site contains portions of land that fall inside the boundary of the National Heritage listed Adelaide Park Lands and City Layout, which was inscribed in 2008 under the *Environmental Protection and Biodiversity Conservation Act 1999* (Com) (EPBC Act). These portions of National Heritage listed Park Lands are identified by the Adelaide City Council as Park 27 (Tulya Wardli). A large portion of the Project Site accommodates the existing building compound of the South Australian Police (SAPOL) ‘Thebarton Barracks’ facility. This building compound is on land that has been excised from the National Heritage listing, but is bound to the east, north and west by National Heritage listed Park Lands. Adelaide City Council’s naming of the Park Lands does not extend to land excised from the National listing.



Figure 13 – Overlay of aerial image over boundary of National Heritage Place



Figure 14 – Overlay of proposed development and boundary of National Heritage Place



Figure 15 – Summary of portion of the Project Site that falls outside of the boundary of the National Heritage Place.

A detailed analysis of the National Heritage values of the Adelaide Park Lands and City Layout is provided in Section 5.0 of this assessment.

4.0 Site Location and Description

4.1 Site Selection Process

In early 2022 the Government of South Australia undertook a review of the State’s New Women’s and Children’s Hospital that was slated to be constructed on land directly to the west of the current Royal Adelaide Hospital. This review was triggered due to concerns that had been expressed that the size of the proposed site was too restrictive to meet future demands and that site constraints may result in a significant cost premium over other sites.²

The South Australian Government appointed an independent Chair to lead a new WCH Review Group to undertake a rapid review into the proposed site location for the new hospital.

Six sites (and variations) were considered by this review:

- Option 1 (a) RAH West Site
- Option 1 (b): RAH West Site plus enhanced public transport and future proofing
- Option 2 (a): Thebarton Police Barracks Site adjacent to Port Road
- Option 2 (b): Thebarton Police Barracks Site set back from Port Road
- Option 3 (a): City West site (square building orientation)
- Option 3 (b): City West site (north/south rectangular building orientation)

² SA Health: 3

- Option 4: Hybrid Site (new WCH split across RAH West and the Thebarton Police Barracks site, connected by pedestrian bridge link over the rail corridor).

Review Group established six working groups to progress relevant issues:

- Clinical Reference Group, which advised on the clinical adequacies of each option,
- Master Plan Working Group, which prepared layout concepts for each site,
- Site Issues Working Group, which investigated issues to achieve site clearance,
- Public Transport Working Group, which provided advice on service improvements,
- Rail Working Group, which investigated undergrounding of rail lines, and
- Financial Working Group, which assessed the financial merits of each option.³

The Site Issues working group was tasked with advising the Review Group of the 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.

The Review Group found that the preferred Project Site (Option 2b) *‘provides the best combination of clinical adjacencies and future capacity expansion, but at a substantial cost premium over option 1(a). Option 2(b) was the most preferred option by the Clinical Reference Group. This is the recommended option if future expansion flexibility of both the RAH and the new WCH is a high government priority.’*⁴

4.2 Site Description

The proposed development area for the new Women’s and Children’s Hospital (‘Project Site’) is on the corner of Port Road and Gaol Road, within Park 27 (Tulya Wardli) of the Adelaide Park Lands. Part of the affected land currently accommodates the SAPOL building compound (not within the boundary of the NHL) and part is park lands (that is within the boundary of the NHL), as illustrated in Figure 14 and Figure 15.

As outlined in more detail in Section 8.1, the affected area of the project has been subject to a wide range of historic uses that have resulted in a portion of Park Lands with a mixed and disparate character. This historic pattern of development has resulted in large areas of the locality being alienated and exiled from the National Heritage listing, including land accommodating the historic Adelaide Gaol, the SAPOL building compound, the freight rail line, and (further east) the Royal Adelaide Hospital.

³ SA Health: 3

⁴ SA Health: 30

Of the total Project Site, only Gaol Road is publicly accessible. To the west of Gaol Road the SAPOL building compound being enclosed by a tall palisade security fence while the horse training and agistment areas have lower wire fencing that precludes access. The small area of landscaped ground to the east (containing some remnant olive trees) is also fenced off from public access.

Land beyond the Project Site includes the rail corridor, Kate Cocks Park and land surrounding the Adelaide Gaol (restricted public access), the historic Adelaide Gaol itself (controlled public access).

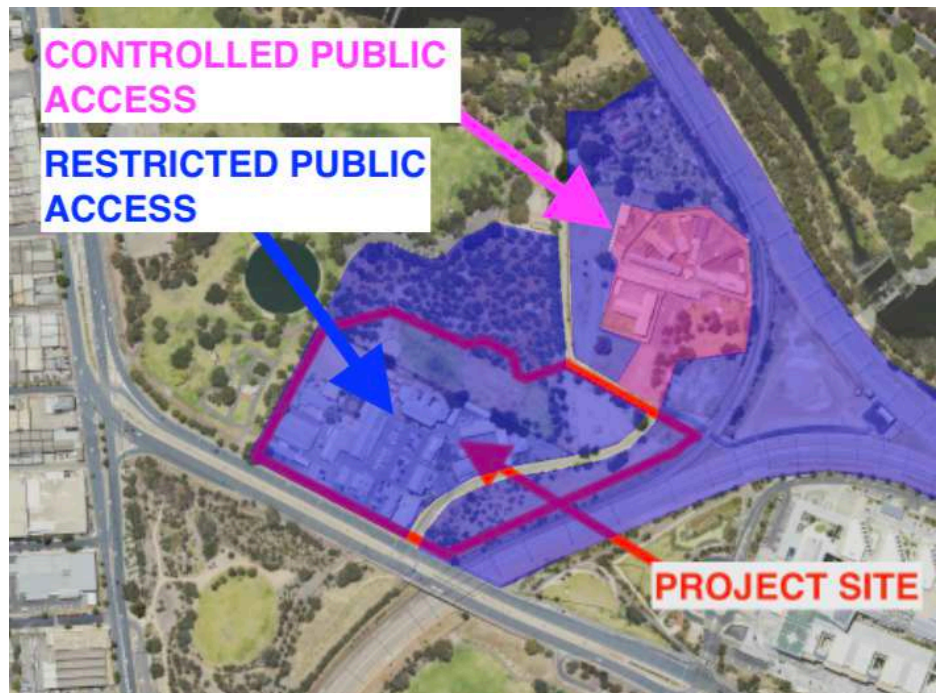


Figure 16 – Aerial image showing extent of affected area indicating current extent of public accessibility

The introduction of the rail lines within the locality has also segregated large areas of nearby Park Lands from each other. This, coupled with other historic encroachments, limited publicly accessible areas, the expansion of Port Road and the tramway extension has resulted in large areas (if not all) of the locality around the Project Site being difficult, or unappealing to publicly access. This lack of public access has likely further contributed towards large areas around Gaol Road being under-maintained and/or un-landscaped.

The majority of the Project Site itself is occupied by the existing SAPOL building compound. These facilities were primarily established between 1915 and 1917 and comprise a collection of single, two and three storey structures and carparking areas / parade grounds enclosed by a high security fence.



Figure 17 – Aerial view of affected area, showing SAPOL building compound to the left and the historic Adelaide Gaol to the right. [Source: Google]

Land to the east of Gaol Road is generally unmaintained, and contains remnant Olive trees. This area was until recently used as part of the SAPOL agistment facilities and remains fenced off from public access. Its landscape character could best be described as ‘under-maintained’.

Land to the northern end of Gaol Road is characterised by gravel hard-stand and has been used in recent times for storage and parking. This includes land to the west of the historic Adelaide Gaol (outside of the boundary of the National Heritage Place).

The historic Kate Cocks Olive Grove is a notable feature within the locality. This grove is presently used as SAPOL agistment and while public access is precluded, it still contributes towards the landscaped qualities of the locality due to the low wire fencing surrounding the area.

This disparate character, coupled with the historic encroachment of the Adelaide Gaol complex, stands in contrast to Bonython Park, that interfaces with the Project Site to the west. Bonython Park was a deliberate initiative by the Adelaide City Council to rejuvenate an area of Park Lands that has historically been prone to utilitarian uses due to its proximity to the important Port Road corridor. Bonython Park is a curated landscape that includes open areas of lawn, gardens, ponds, a playground, kiosk, amenities, roadways and carparks. While the Project Site area has limited public access or appeal, Bonython Park is well patronised by the public, due to quality of facilities, connection by walkways / cycleways and access to parking and public transport.

The limited and difficult access⁵ to the Project Site results in most of the public interface with this area of Park Lands being by motorists as they travel along the very busy Port Road. Project Site presents as a single-to-three storey building compound set very close to the street edge at this interface. The footpath along this interface could best be described as ‘low amenity’, with a tall solid wall or fencing to the SAPOL side, and a very busy road corridor to the other.

⁵ There is no right turn onto Gaol Road from the City



Figure 18 – Gaol Road looking north, with SAPOL building compound to the left and fenced off former agistment to the right



Figure 19 – Fenced off SAPOL building compound from Gaol Road



Figure 20 – Gaol Road looking north, with SAPOL building compound to the left.



Figure 21 – ‘Under-maintained’ former agistment to the east of Gaol Road, with remnant olive trees and fenced off from public access.



Figure 22 – Fenced off ‘un-landscaped’ gravel hard stand to the northern end of the SAPOL compound.



Figure 23 – The historic Adelaide Gaol, with fenced off hard stand areas to left and restricted access carpark to the right.



Figure 24 – Fenced off hard stand area to the west of Adelaide Gaol.



Figure 25 – Hard stand area to northern end of SAPOL site (Royal Adelaide Hospital in back left)



Figure 26 – Kate Cocks Olive Grove (fenced off as SAPOL agistment)



Figure 27 – Adelaide City Council maintenance facility to the north of Kate Cocks Olive Grove



Figure 28 – Interface of Project Site with curated landscapes of Bonython Park



Figure 29 – Roadways and carparking at the interface of Olive Grove (left) and Bonython Park (right)



Figure 30 – Adjacent curated landscapes of Bonython Park



Figure 31 – Olive Grove use as SAPOL agistment

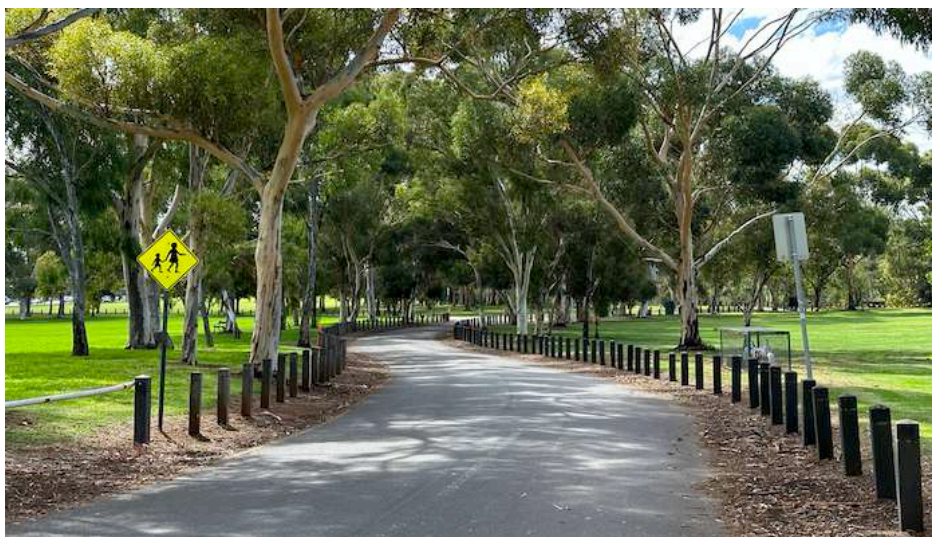


Figure 32 – Roadway through curated landscape of Bonython Park



Figure 33 – Pond within curated landscape of adjacent Bonython Park



Figure 34 – Road Safety Centre to the west of the SAPOL site

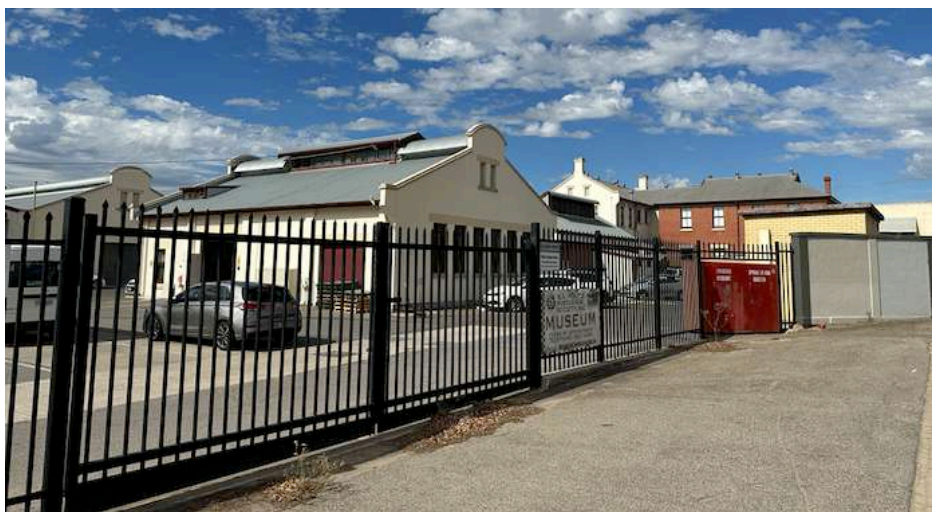


Figure 35 – SAPOL building compound as viewed from Port Road (within Park Lands)



Figure 36 – Port Road (within Park Lands) interface with SAPOL site



Figure 37 – View of SAPOL building compound from Port Road (within Park Lands)



Figure 38 – Port Road (within Park Lands) looking east, with SAPOL building compound to left and road corridor landscaping to right.



Figure 39 – Freight rail corridor to eastern edge of Project Site, interfacing with former SAPOL agistment

5.0 National Heritage Listing Details

This Section details the National Heritage listing, its management arrangements, its gazetted National heritage values, heritage attributes that embody the National Heritage values, and an understanding of its integrity and condition.

5.1 National Heritage Listing

The 'Adelaide Park Lands and City Layout' was inscribed on the National Heritage List by the Commonwealth of Australia in 2008 under the EPBC Act, as illustrated below. ⁶

⁶ DCCEEW 2022a

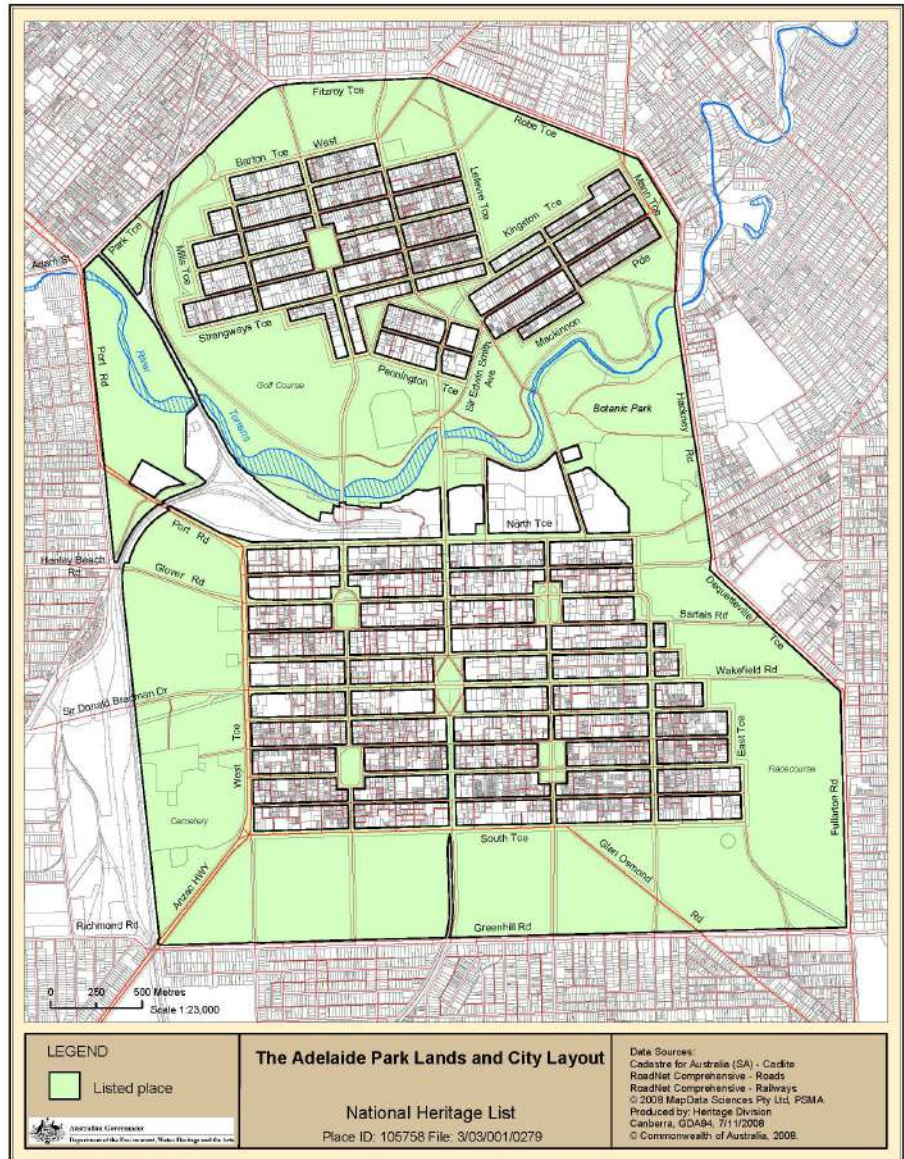


Figure 40 – National Heritage Place boundary [Source: DCCEEW 2022a]

5.2 Management of National Heritage Place

The Department of Climate Change, Energy, the Environment and Water (Com) (DCCEEW) recommend that all National Heritage places develop a Heritage Management Plan (HMP). An HMP is a tool intended to provide sufficient information to protect and manage all of the heritage values of a National Heritage place.⁷

The City of Adelaide (CoA) and the South Australia Government and its agencies protect and manage the Park Lands for all South Australians. In mid-2022 CoA engaged a consultant to prepare a HMP for ‘The Adelaide Park

⁷ DCCEEW 2023b

Lands and City Layout' National Heritage listing. This HMP is still in the process of being prepared at the time of writing this NHIA, and has not been available for review or reference in preparing this assessment.

In the current absence of a dedicated HMP for the National Heritage Place, DCCEEW identifies the City of Adelaide's Management Strategy and the Adelaide (City) Development Plan as the relevant *management arrangements in place* for the National Heritage values.⁸ The latter of these documents has since been superseded by the Planning and Design Code, operating under the *Planning, Development and Infrastructure Act 2016* (SA). These documents, however, were not written with the intent to manage the National Heritage values of the place.

In 2018, DASH Architects was engaged by the Department for Environment and Water (SA) to undertake an 'Issues and Opportunities Analysis' for The Adelaide Park Lands and City Layout National Heritage listing. This study identified the general lack of guidance in the City of Adelaide's Management Strategy and the Adelaide (City) Development Plan in relation to the place's National Heritage listing. It noted that the documents were not written with the intent to manage the place's National Heritage values and they provided no reference to the National Heritage Management Principles.

DASH Architects' 2018 study identified around nine parties that are responsible for the management of the Park Lands within the National Heritage boundary (Figure 40), with CoA having the main responsibility (around 89%) and others including the Minister for Education (Adelaide High School) and Adelaide Cemeteries Authority (West Terrace Cemetery). All the land managers within the National Heritage boundary have obligations under the EPBC Act to protect and manage the National Heritage values of the place under their control.

The CoA is responsible for the administrative reporting of National Heritage impacts to Kadaltilla / Park Lands Authority (K/PLA), formerly known as the Adelaide Park Lands Authority (APLA). K/PLA was established as APLA in 2005 as a subsidiary of the CoA under the *Local Government Act 1999*, and they are the principal advisor to both CoA and the State Government on the protection, management, enhancement and promotion of the Adelaide Park Lands.

The 2018 study provided interim guidance on the management obligations associated with works that have the potential to impact the National Heritage values of the place, which included the self-assessment and referral processes under the EPBC Act. In the absence of a dedicated HMP, and the disconnect of otherwise cited management documents, the proposed action can only be assessed for its impacts against each gazetted criterion, listed below.

5.3 National Heritage Values

The National Heritage listing for 'The Adelaide Park Lands and City Layout' was found to meet six of the eight significance criteria under Division 2

⁸ Department of the Environment and Energy 2019:61

Section 10.01A (2) of the *Environment Protection Biodiversity and Conservation Regulations 2000* (Cth) (EPBC Regs).

Outlined below are extracts from the National listing, accompanied by some contextual discussion and a summary of attributes of the place that are considered to embody these heritage values.

Criterion (a) *The place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.*

Gazetted Heritage Value

The Adelaide Park Lands and City Layout is the physical expression of the 1837 Adelaide Plan designed and laid out by Colonel William Light. It has endured as a recognisable historical layout for over 170 years retaining the key elements of the plan; encompassing the layout of the two major city areas separated by the Torrens River, the encircling Park Lands, the six town squares, and the grid pattern of major and minor roads. It is substantially intact and reflects Light's design intentions with high integrity.

The Adelaide Park Lands and City Layout is of outstanding importance because it signifies a turning point in the settlement of Australia. It was the first place in Australia to be planned and developed by free settlers, not as a penal settlement or military outpost.⁹ The colony of South Australia was established by incorporation as a commercial venture supported by the British Government, based on Edward Wakefield's theory of systematic colonisation. To be commercially successful, there needed to be contained settlement to avoid speculative land sales and this settlement needed to be designed and planned to attract free settlers and to provide them with security of land tenure. The city layout with its grid plan expedited the process of land survey enabling both rapid settlement of land and certainty of title. The wide streets, public squares and generous open spaces provided amenity and the surrounding park lands ensured a defined town boundary while still allowing for public institutional domains. These elements are discernable [sic] today.

The Adelaide Park Lands is also significant for the longevity of its protection and conservation. The Adelaide Municipal Corporation Act (1840) established the city council as the 'conservators' of the city and park lands. The establishment of the Park Lands Preservation Society in 1903, along with successive community organisations marks a continuing pattern in community support for safeguarding the significance of the Park Lands for the Adelaide community. The Adelaide Plan was highly influential as a model for planning other towns in Australia and overseas. It is acknowledged by town planners and historians as a major influence on the Garden City Planning movement, one of the most important urban planning initiatives.

⁹ This statement in the listing is incorrect. Adelaide was the first place to be planned & settled by free settlers in Australia without the use of convict labour. The first free settlement was Fremantle (or Swan River as originally known) where it was developed by free settlers from 1829 to 1842 when 234 juvenile offenders were transported to WA to assist with the labour shortage (Fremantle 2018). Free settlement also occurred early in the Hunter Valley with convict labour (S. Johnston pers. comm.).

DASH Architects' Discussion of Criterion (a)

The key factors recognised as being of historical importance to Australia's cultural history for the place include:

1. recognisable historical layout that has endured for over 170 years

2. legibility of the 1837 Adelaide plan is recognisable

Refers to the recognisable historical layout of the 1837 Adelaide plan. The completion of the suburban land surveys defined the outer perimeter of the Park Lands. Reference to its legibility and the endurance of the layout relate to the overall integrity of this design, namely the elements in the plan that are still discernible today (i.e. six squares, encircling parklands, grid pattern of streets). The 'recognisable historical layout' has endured (now) for over 180 years.

3. turning point in Australian settlement, a planned colony for free settlers

4. based on Edward Wakefield's theory of systematic colonisation

5. established as a commercial venture and supported by the British Government

Refers to the key idea for the settlement. Adelaide was a turning point in Australian settlement being a planned colony for free settlers. However, the listing is slightly incorrect in that it was the first place to be planned and settled by free settlers in Australia without the use of convict labour. The thinking behind the new settlement was a balance of capitalistic ideals and social responsibility, based on Wakefield's theory of systematic colonisation. These factors influenced the 1837 Adelaide plan in terms of the number and size of land parcels in the city centre and surrounding suburbs, to ensure a centralised and regulated control of the sale of surveyed land. They also influenced social and cultural life, such as social inclusion, religious tolerance and self-sustainability. Whilst there has been subdivision of the original town acres, and additional laneways and streets through these land parcels, the overall rectangular form and road hierarchy and width of these original roads in Light's plan is still discernible today.

6. key elements of the plan (principal characteristics) and historical layout

Key elements of the 1837 Adelaide plan are mentioned under several criteria with respect to different heritage values (i.e. under criterion (d) they are linked to the "exemplar of a nineteenth century planned urban centre"). With respect to criterion (a), these elements are linked to the ideals behind the plan and the historical influences still discernible today.

7. longevity of its protection and conservation by the city council and successive community organisations

Refers to the role of City of Adelaide and its 'successive landscape designers/managers' (also mentioned under criterion (f)) and other management, that has played a role in designing, maintaining and protecting the Park Lands since the establishment of the city council in 1840. It also refers to the role of the Park Lands Preservation Society and other successive community organisations who have played a role in safeguarding the Park Lands (also acknowledged under criterion (g) for their social significance).

8. highly influential as a model for planning other towns in Australia and overseas

The 1837 Adelaide plan was a 'model plan' for other towns. In 1864 Surveyor-General George Goyder drew up a standard plan for country towns throughout South Australia in a grid pattern with a parkland perimeter similar to Adelaide's. The town planning principles for the City of Adelaide went on to form the basis of Goyder's model layout for government-designed rural towns in South Australia from the 1860s to the 1910s.

9. major influence on the Garden City Planning movement.

The 1837 Adelaide plan was a 'major influence on the Garden City Planning movement'. Ebenezer Howard's Garden City movement was an early twentieth century town planning ideal. Howard's 1902 text 'Garden Cities of To-morrow' expressed the 1837 Adelaide plan as an 'ideal' town plan. However, there is debate as to whether the Movement was influenced by the 'Adelaide plan'. The Garden City movement had a profound effect on town planning with ideals of creating new parks, boulevards and street beautification by linking aesthetics with growth, and encouraging generous open spaces and other characteristics.

Attributes considered to embody the heritage values of Criterion (a)

- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- encircling Park Lands
- defined inner and outer boundary
- six town squares
- streets in a grid pattern, hierarchy and width of streets
- longevity of conservation and protection of Park Lands

Criterion (b) *The place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.*

Gazetted Heritage Value

The Adelaide Park Lands and City Layout is rare as the most complete example of nineteenth-century colonial planning where planning and survey were undertaken prior to settlement. The historical layout as conceived in the 1837 Adelaide Plan remains clearly legible today. The place is also the only Australian capital city to be completely enclosed by park lands and is the most extensive and substantially intact nineteenth-century park lands in Australia.

DASH Architects' Discussion of Criterion (b)

The key factors recognised as being of rare or uncommon aspects of Australia's cultural history for the place include:

1. most complete example of nineteenth-century colonial planning, where planning and survey were undertaken prior to settlement

The 1837 Adelaide plan being the most complete example of colonial planning and survey that was undertaken prior to settlement refers to the ideals that were discussed under criterion (a). This makes Adelaide different from the design and planning of other capital cities in Australia. Other major Australian settlements, such as Sydney (1788), Hobart (1803), Brisbane (1824), Perth (1829) and Melbourne (1835), began with a small area of rectangular grid planned streets that still exists today, but around that they developed in an irregular way. There was also no vision of how they would develop into larger settlements, and little provision for large areas of open space, which makes the planning and design of the 1837 Adelaide plan unique.

2. historical layout of the 1837 Adelaide Plan remains clearly legible today

Key characteristics, outlined under criterion (d), such as its defined boundary, grid pattern, width of streets, public squares, and expansive public open space for commons and public domains remain legible today in the city's current form.

3. only Australian capital city to be completely enclosed by Park Lands

The planning for the city of Adelaide by Light included the surrounding (or encircling) Park Lands, which is a unique feature. No other Australian capital city has this design. The overall form and layout of the Park Lands is a clearly visible feature when viewing Adelaide from the air or from Mount Lofty, which is specifically mentioned under criterion (f).

4. most extensive and substantially intact nineteenth-century Park Lands in Australia

Refers to the Park Lands as a 'space' with the overall form being important. Comparative examples to the Adelaide Park Lands (822 ha) include Kings Park in Perth (400ha), Albert Park in Melbourne (225 ha) and Centennial Park in Sydney (220 ha).

Attributes considered to embody the heritage values of Criterion (b)

- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- encircling Park Lands

Criterion (d) *The place has outstanding heritage value to the nation because of the place's importance in demonstrating the principal characteristics of: (i) a class of Australia's natural or cultural places; or (ii) a class of Australia's natural or cultural environments.*

Gazetted Heritage Value

The Adelaide Park Lands and City Layout is an exemplar of a nineteenth-century planned urban centre. It demonstrates the principal characteristics of a nineteenth century city including a defined boundary, streets in a grid pattern, wide streets, public squares, spacious rectangular blocks and expansive public open space for commons and public domains. The expression of these features with their generous open space reflects the early theories and ideas of the Garden City movement of an urban area set in publicly accessible open space with plantings, gardens, designed areas and open bushland.

DASH Architects' Discussion of Criterion (d)

The key characteristics recognised as being of a class of Australia's cultural places, being an exemplar of a nineteenth-century planned urban centre, include:

1. defined boundary

Light's 1837 Adelaide plan did not clearly define the outer boundary of the Park Lands; it was drawn as a roughly dotted line. Whereas the inner perimeter along the terraces was sharply defined. The outer boundary was defined the following year as the surrounding interfacing areas were surveyed.

2. streets in a grid pattern

3. wide streets

The 'streets in a grid pattern' and 'wide streets' formed part of Light's 1837 Adelaide plan with nine east-west streets between North and South terraces of one and two chain widths, and four north-south streets in the much longer distance between West and East terraces. A similar pattern and hierarchy of streets was designed in North Adelaide, although the land parcels and streets were designed around the topography. The grid pattern had been used since classical times by the Ancient Greeks and Romans, however Light's response to the topography forms the unusual grid pattern for North Adelaide.

There was a logical hierarchy of the major and minor streets, although Light did not prescribe the connectivity to the urban land parcels. Over time, various roads, lanes and public transport were added through the encircling Park Lands and squares, which had an impact on their form at a micro level, such as it created what we know today as 29 parks. At a macro level there are still six squares and encircling Park Lands.

4. public squares

Many of the characteristics that make Adelaide's planned city so important were part of a series of rules by the Spanish for designing colonial cities called the 'Law of the Indies', which included a geometrical grid pattern with a main thoroughfare, centred around a main square. Adelaide's six public squares

(Victoria, Light, Hindmarsh, Hurtle, Whitmore and Wellington) were part of Light's plan with an underlying understanding and commitment to improving the well-being of new settlers.

Light's 1837 plan shows the squares dotted with trees and meandering paths. The overall form of the six squares remains legible today with minor changes to their configuration to accommodate changing transportation and connectivity requirements for a growing modern city. The internal spaces and uses of the squares have changed over time, however the spaces and their intended uses were never clearly defined in Light's survey or writings.

5. spacious rectangular blocks

The 'spacious rectangular blocks' was formed by the division of land into 1042 town acres, straddling the Torrens River, with two distinct areas: 700 in South Adelaide and 342 in North Adelaide. This specific number and size of allotments was chosen, being contained by the outer ring of Park Lands and the inner squares, to help ensure the commercial success of land sales and security of land tenure for new settlers. Where other colonial settlements were perceived as being unsuccessful, Adelaide's 'planned urban centre' was to be successful through its careful design and planning. Having been substantially subdivided over time, this element of the plan is no longer discernible.

6. expansive public open space for commons and public domains.

The 'expansive public open space for commons and public domains' refers to the outer ring of Park Lands and the land along the Torrens River. Light's 1837 plan illustrates these areas with trees and grassland, and it allocates areas for a number of government or community facilities, including Government House, barracks, hospital, school, cemetery and market.

The above key characteristics reflected the early theories and ideas of the Garden City movement, including:

- publicly accessible open space with plantings
- gardens
- designed areas
- open bushland.

Ebenezer Howard's Garden City movement started in the 1890s. The Adelaide City Plan was identified as an 'ideal' town plan, as it reflected early 19th century ideals about access to public open space. The expression of these features are still clearly discernible throughout the Park Lands and squares. There are multiple areas of 'publicly accessible open space with plantings', such as informal recreation areas, 'gardens', such as Adelaide Botanic Garden and Veale Gardens, and 'designed areas', such as Bonython Park and Elder Park.

There are areas of informal landscape character within the Park Lands that could be considered 'open bushland'. There was a move away from creating formal gardens and exotic plantings in the 1980s, with a focus on replanting parts of the Park Lands with native and indigenous grasses, shrubs and trees. The listing appears to refer broadly to a diversity of landscapes, such as formal and informal gardens, structured and unstructured spaces, all of which sit in contrast to the built form of the city and surrounding suburbs.

Attributes considered to embody the heritage values of Criterion (d)

- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- publicly accessible open space
- diverse landscape character including formal designed plantings, gardens and areas, informal landscapes and open bushland
- encircling Park Lands
- streets in a grid pattern, hierarchy and width of streets
- defined inner and outer boundary

Criterion (f) *The place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.*

Gazetted Heritage Value

Adelaide Park Lands and City Layout is regarded throughout Australia and the world as a masterwork of urban design. Elements of the Adelaide Plan that contribute to the design excellence are the use of the encircling park lands to define the boundary of the development of the city and to provide for health, public access, sport, recreation and public institutional domains, thereby meeting both economic and social requirements.

Designing the city layout to respond to the topography was highly innovative for its time with the northern sections of the city located and angled to take advantage of the rising ground while retaining the Torrens River as a feature within the Park Lands. The judicious siting and wide streets maximised views and vistas through the city and Park Lands and from some locations to the Adelaide Hills. The plan features a hierarchy of road widths with a wide dimension to principal routes and terraces and alternating narrow and wide streets in the east-west direction. Light's planning innovation is supported by substantial historical documentation.

The formal organisation, delineation and dedication of the Park Lands space was a pioneering technical achievement of William Light in the Adelaide Plan.

The overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas, formal avenues, plantations, gardens, use of specimen trees, botanically important living plant collections particularly at the Adelaide Botanic Garden and the strategic placement of buildings and statuary in their settings.

The creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills. The civic design of Adelaide was used as a model for founding many other towns in Australia and New Zealand and it is cited in later seminal Garden City planning texts including 'Garden Cities of Tomorrow' by Ebenezer Howard.

DASH Architects' Discussion of Criterion (f)

The key characteristics of the 1837 Adelaide plan are again referred to in relation to their combination in 'demonstrating a high degree of creative achievement at a particular period', being the new colony for South Australia in the mid-nineteenth century; they include:

1. Use

The Park Lands accommodate a wide range of diverse uses that meet both the economic and social requirements, including sport, recreational and public institutional domains.

2. encircling Park Lands

The 'encircling Park Lands' attribute is well-defined when looking at the Park Lands from the air. However, when reviewing aspects of the encircling Park Lands, there are potential 'broken links', both in relation to the landscape character and what is excluded from the National Heritage listing, being the land in the western Park Lands between Port Road and the River Torrens.

3. response to the topography

Light's topographical response to the terrain was 'highly innovative', as he took these key characteristics and applied them to a specific location to achieve the proposed economic and social foundations for the new colony. These characteristics and the response to the topography are clearly legible today.

4. siting and width of streets that maximised views and vistas

The siting and the width of streets and their formal hierarchy is also mentioned under criterion (d), however reference under criterion (f) relates to how these elements 'maximised views and vistas through the city and Park Lands and from some locations to the Adelaide Hills'.

5. formal organisation, delineation and dedication of the Park Lands space

6. overall landscape planting design

The 'formal organisation, delineation and dedication of the Park Lands space' and 'overall landscape planting design' incorporates various mentioned features, forming part of its aesthetics, overall design, and spatial qualities. This refers to both the original design by Light, and how the Park Lands evolved over the course of the City's history. Early Government and Institutional uses characterised selected locations, in particular the land to the north of North Terrace. Large expanses of Park Lands were divided into smaller parks as roadways connecting the City to the suburbs were constructed. Sections of Park Lands were planned and designed by multiple landscape designers and managers through their employment under the Adelaide City Council.

7. park land design that is viewed from the air or Adelaide Hills

The following 'views and vistas' are mentioned in the listing:

- the judicious siting and wide streets maximised views and vistas through the City and Park Lands and from some locations to the Adelaide Hills
- the overall landscape planting design implemented by several successive landscape designers/managers incorporated designed vistas

- the creativity of the city and parkland design is clearly legible in the contemporary landscape viewed from the air or from the Adelaide Hills.

While the judicious siting and wide streets maximised views and vistas through the City and Park Lands, and in some instances to the Adelaide Hills, it remains unclear whether such views were intentional or incidental. The fact that there are twice as many east-west streets than north-south streets and their width, do however, contribute to the character and amenity of the Park Lands and City Grid Layout, and the views, whether designed, incidental or unintentional, are part of this character and amenity. These views have, of course, evolved over time as the city and surrounding suburbs have grown and densified. Taller buildings within the city have strengthened view corridors, while development on the outer edge, of the Park Lands has provided greater definition to external perimeter of Lights Plan.

Various landscape plantings within the Park Lands have created 'designed vistas', such as along main roads and within the Botanic Gardens. These views and vistas contribute to the landscape character within areas of the Park Lands, however they are not considered to be specifically intrinsic to the National Heritage values themselves. The landscape character of the Park Lands is highly dynamic and has changed considerably over time in response to differing City landscape designers, landscaping and cultural trends, and this curation will continue to evolve through the use of space by subsequent generations.

The Park Lands' design especially is clearly defined within the urban built form, when viewed from the air or Mount Lofty (refer figures below). The importance of these views is essential as a 'greenbelt' surrounding the city.



Figure 41 – Aerial view of Outer ring of Park Lands [Source: City of Adelaide 2018b]

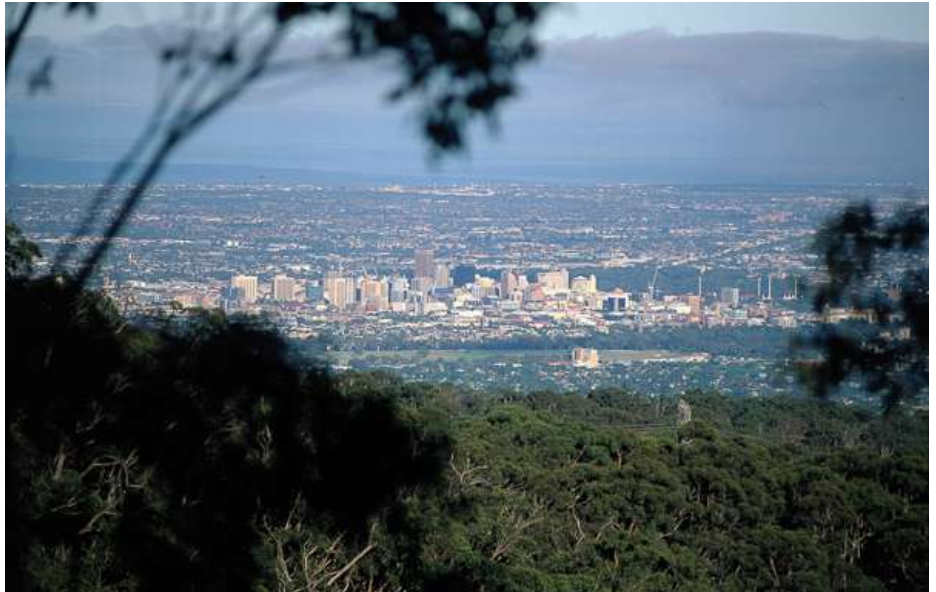


Figure 42 – View of Adelaide CBD and Park Lands from Mount Lofty [Source: Department of Environment and Energy 2018b]

8. 1837 Adelaide plan was used as a model for other towns in Australia and New Zealand

9. 1837 Adelaide plan was cited as an ideal town plan by Ebenezer Howard in his seminal text as part of the Garden City movement.

The '1837 Adelaide plan' was a model for other towns in Australia, such as Gawler, Mylor and Alawoona in South Australia and several places in the Northern Territory, and New Zealand, such as Christchurch. Goyder's established 'model plan' was discussed under criteria (a) (above). Noting that the 1837 Adelaide plan was cited in Howard's seminal text as an 'ideal town', the fact that it was replicated elsewhere in Australia and New Zealand acknowledges its importance in planning and design.

Attributes considered to embody the heritage values of Criterion (f)

- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- diverse landscape character including formal designed plantings, gardens and areas, informal landscapes and open bushland
- formal organisation, delineation and dedication of the Park Lands space
- legibility of encircling Park Lands
- diverse use of the place for recreation, sports, events and meeting spaces
- range of important civic, public, and cultural assets and institutions within the Park Lands

Criterion (g) *The place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.*

Gazetted Heritage Value

The Adelaide Park Lands has outstanding social value to South Australians who see it as fundamental to the character and ambience of the city. The Park Lands with their recreation areas, sports grounds, gardens and public facilities provide venues for individual and group activities and events, meetings and passive and active recreation. The Park Lands also have significant social value due to the range of important civic, public, and cultural assets and institutions within it.

The present Adelaide Parklands Preservation Society is the latest in a long history of community groups dedicated to protecting the Adelaide Park Lands. These have included the Park Lands Defence Association (1869-87), the Park Lands Preservation League (1903, 1948) and the National Trust of Australia (SA). The longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands is exceptional.

DASH Architects' Discussion of Criterion (g)

The key components that are recognised as having social or cultural values for the place include:

1. fundamental to the character and ambience of the city

The Park Lands are acknowledged by many South Australians as having outstanding social value, and are accessed 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.

2. recreation areas, sports grounds, gardens and public facilities that provide venues for individual and group activities and events, meetings and passive and active recreation

The various 'spaces' and 'places' within the Park Lands are acknowledged for their importance in providing diverse areas for various uses and activities. The National Heritage listing does not directly specify what uses directly relate to the significance of the place, but it does mention:

- 'recreation areas', which could include playgrounds, walking and cycling tracks and dog parks
- 'sports grounds', which could include Adelaide Oval, Adelaide Aquatic Centre and various sporting club facilities
- 'gardens', which could include the historic 1850s Botanic Garden and more recent 1980s Himeji Garden
- 'public facilities', which could include playgrounds, fitness equipment, toilets, model aircrafts and boating facilities.

3. range of important civic, public, and cultural assets and institutions within the Park Lands

Various 'places' within the Park Lands are acknowledged for their important civic, public and cultural uses. The National Heritage listing does not directly

specify these places, but it indicates 'cultural assets and institutions' that could include:

- West Terrace Cemetery (established in late 1830s)
- Adelaide Zoo (established in 1880s)
- Torrens Parade Ground (established in late 1890s)
- Adelaide High School (established in early 1950s).

Many of the City's other cultural assets and institutions, such as the South Australian Museum, Art Gallery of South Australia, University of Adelaide, University of South Australia and Adelaide Gaol, are located between the River Torrens and North Terrace. Much of this land has since been excluded from the National Heritage listing.

4. longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands.

Relates to the Adelaide Parklands Preservation Association (1987) and its predecessors, which is a community group that is acknowledged for its long history in advocating for the protection of the Park Lands. These preservation groups grew out of a concern for alienation of the Park Lands with the first society forming in 1903. Some land uses remain controversial and there is still community concern raised at various proposed intrusions into the Park Lands, in particular into publicly accessible open space.

Attributes considered to embody the heritage values of Criterion (g)

- the physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light
- diverse use of the place for recreation, sports, events and meeting spaces
- important civic, public, and cultural assets and institutions within the Park Lands
- publicly accessible open space
- longevity of conservation and protection of Park Lands
- association with community groups that campaign for its protection and accessibility.

Criterion (h) *the place has outstanding heritage value to the national because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history*

Gazetted Significance Assessment

Colonel William Light is most famously associated with the plan of Adelaide. He bore the ultimate responsibility, as recorded in his surviving publications and letters.

DASH Architects' Discussion of Criterion (h)

Colonel William Light is acknowledged as a person of importance in Australia's cultural history. Light was ultimately responsible for the 1837 plan for the City of Adelaide, which laid out the streets, land parcels, squares and parklands for the city centre of the new colony. Whilst others had an influence

in the design, such as Edward Gibbon Wakefield's principles for establishing a colony for South Australia with solid economic and social foundations, and the Colonization Commission's regulations (1835) and instructions (1836) that spelled out certain criteria, it was Light's knowledge of city planning principles and historic precedents, and his combination of these other influences that produced the Adelaide city plan.

Attributes considered to embody the heritage values of Criterion (h)

- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- association with Colonel William Light

5.4 Summary of Heritage Attributes

The following heritage attributes are considered to embody the National Heritage values of the 'The Adelaide Park Lands and City Layout'. These attributes form the basis of the self-assessment in Section 10.0 below:

Light's 1837 Adelaide Plan (a, b, d, f, g, h)

- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- defined inner and outer boundary
- legibility of encircling Park Lands
- six town squares
- streets in a grid pattern, hierarchy and width of streets
- publicly accessible open space
- formal organisation, delineation and dedication of the Park Lands space

Use (f, g)

- diverse use of the place for recreation, sports, events and meeting spaces
- range of important civic, public, and cultural assets and institutions within the Park Lands

Landscape Character (d, f)

- diverse landscape character including formal designed plantings, gardens and areas, informal landscapes and open bushland

Associations (a, g, h)

- longevity of conservation and protection of Park Lands
- association with community groups that campaign for its protection and accessibility
- association with Colonel William Light

5.5 Condition and Integrity of National Heritage Place

Defining and describing a place's condition and integrity is important to assist in the management of that place's heritage values. Condition refers to its current state and may reflect cumulative impacts. A place is said to have integrity if its assessment and Statement of Significance is supported by sound research and analysis, and its fabric and curtilage are largely intact.¹⁰

The National Heritage Place is considered to be generally in good condition. Since the National Heritage listing in 2008, the following 12 projects have resulted in a referral to the Australian Government Minister for the Environment under the EPBC Act:

- 2009/4697: Coast to Coast Light Rail – City West to Adelaide Entertainment Centre (transport project)
- 2009/4848: Café in Rundle Mall (commercial development)
- 2009/4948: Adelaide Central Reinforcement Program (energy generation and supply project)
- 2010/5542: O'Bahn City Bus Route (transport project)
- 2011/6223: Adelaide Oval Redevelopment (tourism and recreation project)
- 2012/6679: Adelaide High School Redevelopment (commercial development)
- 2013/6723: Riverbank Precinct Pedestrian Bridge (tourism and recreation project)
- 2015/7601: O'Bahn City Access Project (transport project)
- 2016/7849: Adelaide Festival Plaza Precinct Upgrade (commercial development)
- 2017/7945: Adelaide Festival Plaza (commercial development)
- 2019/8403: Adelaide Oval Hotel (tourism and recreation)
- 2019/8475: South Parklands Stormwater Project (water management and use).

Whilst all of the referred projects were assessed to be 'Not a Controlled Action', many resulted in incremental impacts to the National Heritage values of the place. Also refer Section 9.3 Cumulative Impacts.

6.0 Overview History of National Heritage Place

The Adelaide Plains are the traditional lands of the Kurna people. The River Torrens was a source of food and water and was known as *Karrawirra Pari*. The Kurna people remained living in the Adelaide area for some time after early development of the colony.¹¹

¹⁰ NSW Heritage Office ND:6; NSW Heritage Office 2001:11

¹¹ History Trust of SA 2023

In 1836, shortly after the new colony was founded, Surveyor-General Colonel William Light commenced the survey for the City of Adelaide, having decided upon a site along the banks of a river. Light's plan divided the land into two distinct areas, North Adelaide and South Adelaide (refer figure below). The land was further divided into 1042 town acres, which were surrounded by Park Lands and included five squares. The plan for the new colony was set out in the Regulations (June 1835) and Instructions (March 1836) by the Colonization Commissions in England, which included advice on precedents (i.e. towns in America and Canada), location (i.e. near a commodious harbour), layout (i.e. streets of ample width), features (i.e. reserves for squares) and other local considerations (i.e. temperature, winds).¹²

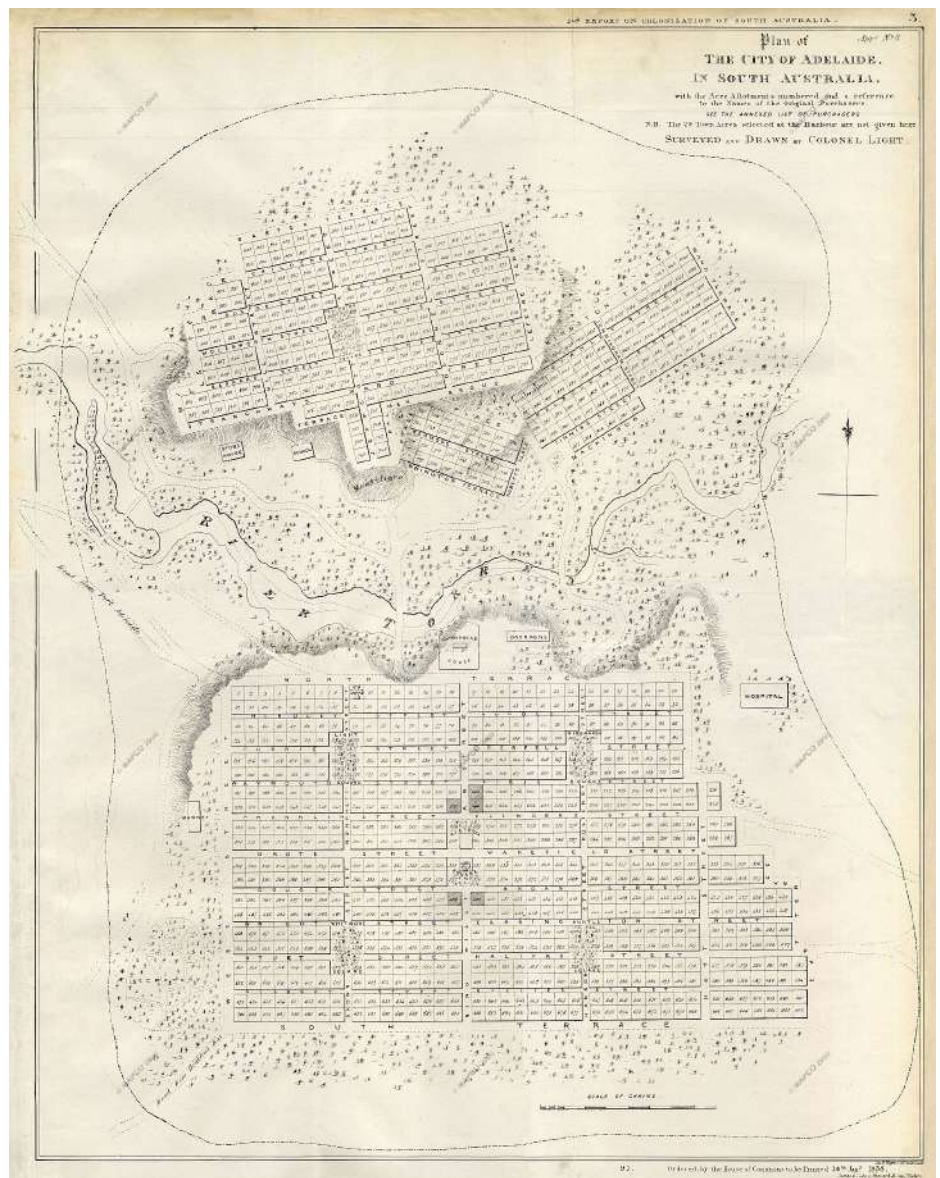


Figure 43 – William Light's 1837 survey of Adelaide [Source: Second report on Colonization of South Australia, House of Commons, 1837]

¹² DASH Architects and Peter Bell 2018:9-10

Of particular interest in Light's 1837 Plan was the belt of lands around the city, as publicly accessible open parkland. This park land serviced several purposes. It was generally viewed in England and North America in the early 19th century as a desirable means to provide relief from the increasingly urbanised old city centres, and was recommended for all new planned towns or cities during this era. They also served as a means to containing the commercial value of the surveyed acre allotments from nearby speculative land sales.

No-one at the time, however, defined in writing the intended uses for the Park Lands. The only official guidance was Light's 1837 plan that identified mostly government uses including Government House, a store house, school, hospital, barracks, market and cemetery (a total of nine Government Reserves). Government uses needed to be accommodated somewhere and it was likely undesirable to generally locate these functions on saleable land.

Shortly after 1838 an area of the Park Lands was established to 'bring together' European and Kaurna people, which was known at the time as the 'Aboriginal (or Native) Location'. Traditional camping grounds extended along the river, mostly on the northern side. The area of Botanic Park was an important camping ground from the 1840s to the late nineteenth century. Other established land uses in the Park Lands in 1838 included a Botanic Garden (not the present one), an Astronomical Observatory and an Immigration Barracks.¹³

The early years of the Colony were starkly different to that we recognise today. Decisions about land uses within the Park Lands were being made from necessity, and within a landscape that looked markedly different to that of today. The Park Lands, the urban land inside them and the suburban land outside them were all covered in open grassland alternating with native scrub. Whereas today we see a sharp urban boundary where the buildings stop and the Park Lands begin. In the early years of settlement that boundary existed only as survey pegs and a line on a paper plan. The outer perimeter of the Park Lands was eventually defined in 1838 when the surrounding suburban areas were surveyed and roads were established (refer figure below).

¹³ DASH Architects and Peter Bell 2018:3-4,10-11; Jones 2007:3.1.9, p.2

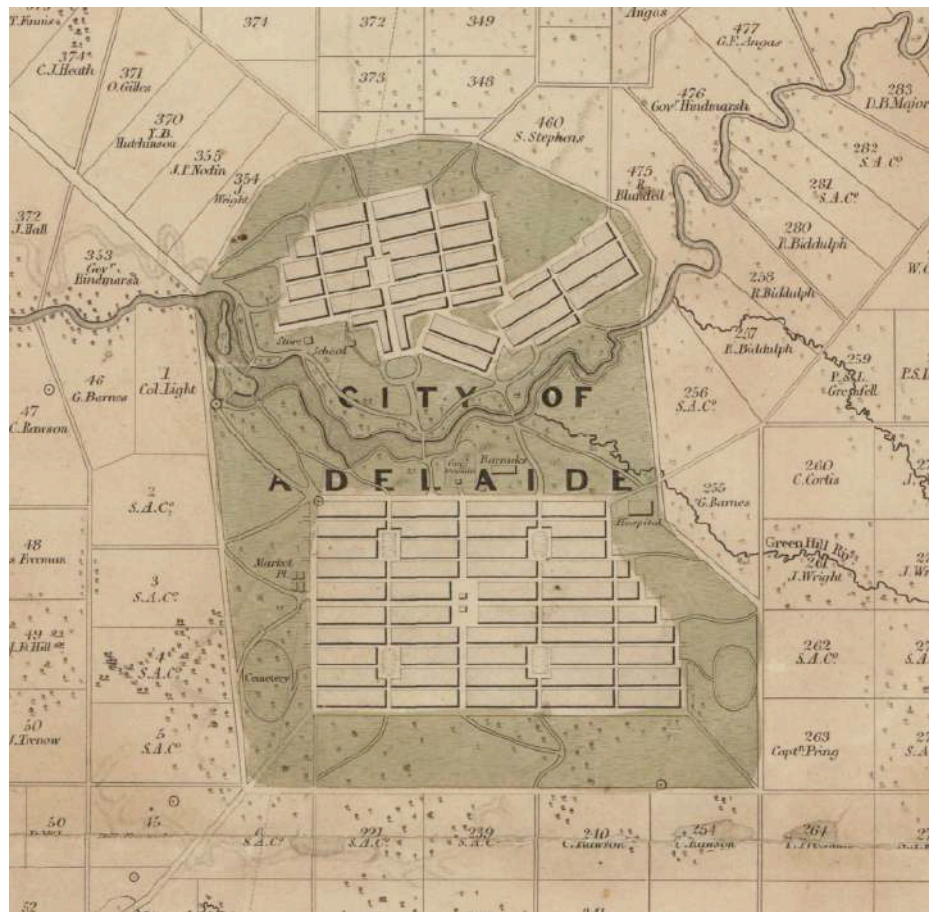


Figure 44 – Districts of Adelaide plan by Arrowsmith, 1839 [Source: Adelaide City Archives]

Some of the deficiencies or lack of detail in Light's 1837 plan were amended over subsequent years with more detailed surveys, such as Kingston's 1842 survey of Adelaide that identifies buildings, fences and newly created laneways. The obstacle of Government House blocking the main northern street was moved aside, and road connections between the city, North Adelaide and the suburbs were strengthened. The evolution of street connections, tramways, railways and bridges would continue for decades, every addition taking up space and redefining the division of the Park Lands into segments. Private landholders also subdivided their town acres for resale, which created smaller allotments and additional north-south private roads and laneways.

The early spread of Park Land encroachments likely caused limited controversy during these early years as the fledgling colony sought to establish the essential services needed to survive. Furthermore, Adelaide began with a small population and there was plenty of land for all purposes. Early encroachments were reflective of the cultural values (and colonial priorities) of the Park Lands at the time, which remained very utilitarian.¹⁴

Early management of the Park Lands was hindered because no-one knew who was responsible. Attempts at forming a local government corporation in

¹⁴ Cheesman 1986:94

1840 and 1849 were short-lived. In 1849 the City Commission took over management of the Park Lands, establishing the precedent that they were under local government control. When the Adelaide Corporation was formed in 1852, one of its first acts was to appoint a Park Lands Ranger. ¹⁵

Light had given no indication to how he envisaged the Park Lands should be landscaped. His 1837 plan shows the Park Lands randomly speckled with trees, but this could be a sketch of what he found there at the time rather than guidance for future management. George Francis, appointed as the first Director of the Adelaide Botanic Garden in 1855, had strong ideas about promoting civic amenity through urban gardens. During Francis' tenure (1855-1865), he co-operated with the Adelaide Corporation by planning formal gardens in Brougham Place, Palmer Place and Victoria Square, and provided plants from the Botanic Garden nurseries for the first tree plantings in the Park Lands and in urban streets. ¹⁶

By 1840 West Terrace Cemetery was in use, and Government House, the military barracks and Adelaide Gaol were all under construction. Adelaide Hospital was built in the Park Lands in 1845 on the eastern side of the Botanic Gardens, however there were two other hospital buildings in the Park Lands until the main hospital site was established in 1856 on North Terrace. Other institutional and government buildings constructed in the 1850s, predominantly on the northern side North Terrace include the first Police Barracks in 1851, Adelaide Lunatic Asylum in 1852, Armoury in 1854 and the Adelaide to Port Adelaide Railway in 1856. At the time no boundary was drawn for the use or containment of these institutional buildings in the Park Lands. The act of surveying for a new Botanic Garden in the 1850s defined the land available for the hospital and asylum for the first time. ¹⁷

By the early 1850s the recreational values of the Park Lands began to be widely recognised, and some areas were fenced, and gardeners appointed to maintain them. William O'Brien was appointed the first City Gardener and he implemented Francis' recommendations with ideas of his own. By this time the outer perimeter of the Park Lands had been defined (by the 1838 surveying of the outer suburbs) and the essential infrastructure needed to operate a new colony had been initially established. A grandstand was built at the racecourse in the east Park Lands in 1855, which caused community concern about the erection of a permanent structure in the Park Lands. ¹⁸

This phase marked a clearly identifiable evolution in community attitudes towards, and the cultural importance of, the Adelaide Park Lands that has continued since. The use and the cultural values of the Park Lands have evolved from their initial utilitarian functions to have a greater cultural and social importance. Growing tensions between the increasing utilitarian use of the Park Lands and their recreational value led to the formation of several community groups who were opposed to alienation of the Park Lands, such as the Park Lands Defence Association in 1869 and first Park Lands Preservation Society in 1903.

¹⁵ Sumerling 2011:173,217

¹⁶ Jones 2007:37

¹⁷ Sumerling 2011:190

¹⁸ DASH Architects and Peter Bell 2018:11; Jones 2007:38-39

The utilitarian use of the Park Lands was not, however, limited to government. The cutting down of trees for firewood was one of several early activities that transformed its appearance. As the settlement grew, demand for domestic firewood increased, and industries such as brick-making and lime burning had a large appetite for fuel. Even after they shifted to the suburbs, firewood cutters continued to harvest the Park Lands without restriction. In the next few decades, virtually all native trees in the Park Lands were cut down. Photographer Townsend Duryea took a series of panoramic photographs of the city in 1865 that show sheep grazing in large areas of grassland in the surrounding Park Lands that is almost entirely bare of trees.

Some early land uses in the Park Lands persisted for a long time. Government sanctioned quarries opened along the banks of the Torrens, which supplied city builders for decades. Extensive areas were used to dump waste and rubbish. From the 1850s farmers paid the Corporation a rental fee to graze animals in most areas of the Park Lands. This practice was discontinued for sheep and cattle in 1972, with areas of land in the north Park Lands still being used as a horse agistment today.¹⁹

In 1860 seven sections of the area between North Terrace and the River Torrens, originally part of the Park Lands, were allocated as a government reserve for various government and institutional purposes. Subsequent developments in these areas include an Institute, City Baths, Art Gallery, Jubilee Exhibition Building, Museum, Botanic Gardens, State Library, University of Adelaide, University of South Australia, Parliament House, Incinerator and Police Barracks. In other areas of the Park Lands, an Observatory was established and the Victoria Park racecourse expanded.²⁰

The legacy of Francis and O'Brien continued on for the remainder of the 19th century by their successors. The emphasis was on formal plantings and civic amenity. North Terrace and other major roadways were lined with trees, around 9,000 trees were planted in Botanic Park, and internal areas of the Park Lands were planted with clumps of trees, as illustrated on the Map of Adelaide below.²¹

¹⁹ Sumerling 2011:217

²⁰ Department of Climate Change, Energy, the Environment and Water 2023a

²¹ Jones 2007:42

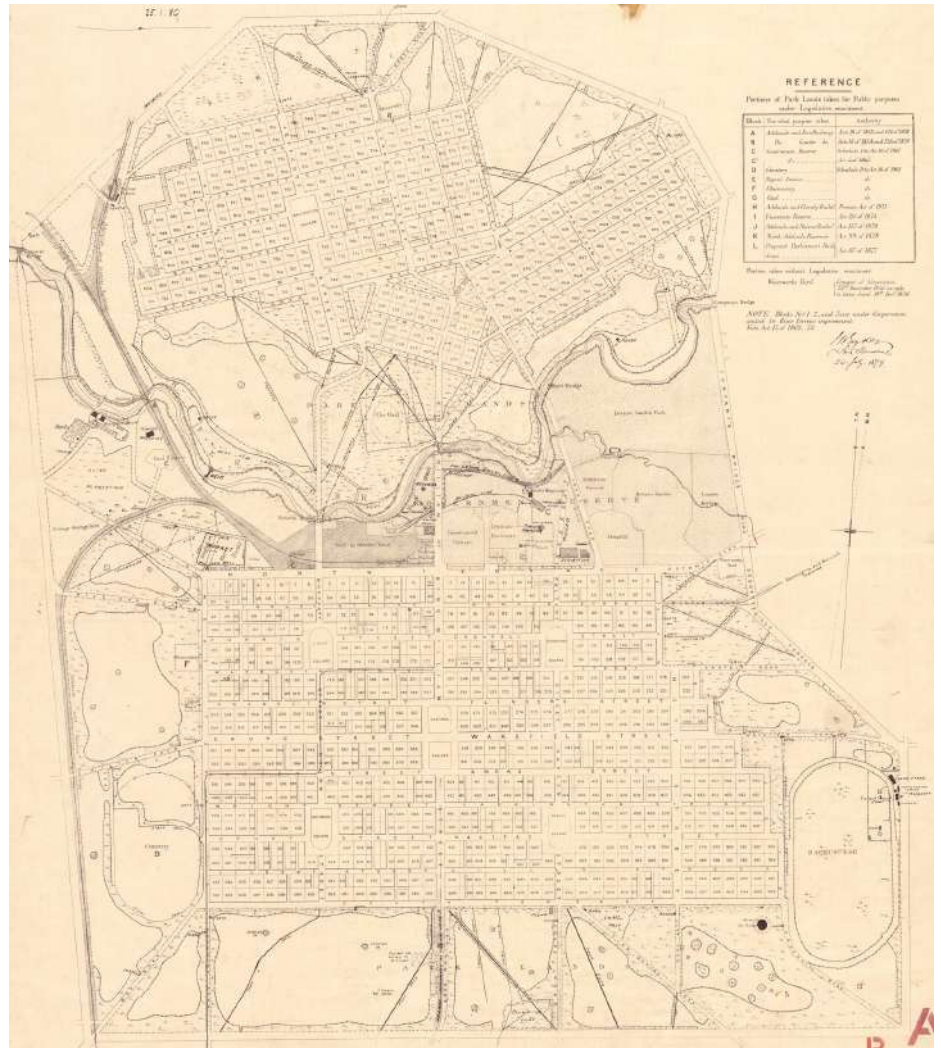


Figure 45 – Map of Adelaide, 1879 [Source: State Records of SA, GRG35_585_0_3_22]

In the early 20th century the Park Lands and squares were further defined by the removal of large numbers of gum trees and their replacement with deciduous exotics. Several playgrounds were established during this period. The city's population peaked during the First World War to nearly 40,000, then steadily dropped as new subdivisions and shopping centres attracted residents to metropolitan areas. The city's population dropped sharply in the 1950s and by the late 1960s it was below 15,000, which was roughly the same as what it was in the 1850s.²²

The merchants and landlords of Adelaide City Council panicked as they watched the city die. The 1960s saw a wave of measures to draw population back into the centre, and in the great age of the motor car, most of these measures took the form of facilitating traffic movement, an aspect of city planning that Light had not foreseen. West Terrace was widened, a new major north-south connector, Frome Street, was created (although its full extension was never completed, creating an odd scenario for the Adelaide grid layout

²² Linn 2006:206-217; DASH Architects and Peter Bell 2018:15

where a key roadway stops mid plan). East Terrace was also linked directly to Grenfell Street by a new loop intruding into the Park Lands. Sporting facilities and the Swimming Centre appeared. The layouts of the squares were streamlined to take more cars, and high-rise car parks proliferated throughout the city. There were significant impacts on the squares and parts of the Park Lands as these measures were carried through.²³

The landscape of the Park Lands further developed into the mid 20th century with the creation of areas of formal plantings, such as Bonython Park, Rymill Park and Veale Gardens. These areas also included new water bodies and statues. New developments in the Park Lands included Adelaide High School on West Terrace and the Adelaide Swimming Centre in the northern Park Lands. The Government Printer's Office, City Baths and part of the former railyards on King William Road were demolished to make way for the Festival Centre between 1969 and 1974. 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.²⁴

By the 1980s there was a move away from creating formal gardens and planting exotic species, and a focus on reinstating native vegetation. The formal Japanese-style Himeji Garden was however created in 1982 on South Terrace. The train marshalling yards on North Terrace were moved to Keswick, and this land was later developed to be inclusive of the Hyatt Hotel, Convention Centre, while the 1928 Railway Station building was refitted as the Adelaide Casino. These facilities were granted long-term leases. There have now been three larger convention centres built and other commercial uses on former railway land at the west end of North Terrace for educational and research activities associated with the universities.²⁵

At the other end of North Terrace, various transport activities were winding up. The Park Lands tram depot was partly demolished and used to park the bus fleet until 1992. In 1998 the Botanic Garden administration and Herbarium moved into the vacant State Transport Authority buildings, and the National Wine Centre was built in 2001 on Botanic Road with its administration taking over the former Adelaide Lunatic Asylum building.²⁶

The fourth community group to protect the Park Lands was formed in 1987 to oppose further intrusion. In more recent decades, the Park Lands began hosting temporary events, such as car races and festivals. The *Adelaide Park Lands Act 2005* was established to provide for the protection and management of the Park Lands, limiting commercial uses.

²³ Linn 2006:206-217; DASH Architects and Peter Bell 2018:15

²⁴ Linn 2006:178-217

²⁵ Mosler 2006

²⁶ Aitken et al 2006:51-53,58-59

Early historic encroachment within the Adelaide Park saw large areas of Light’s original planned open space developed for utilitarian, Government, and institutional use. Land to the north of North Terrace was particularly vulnerable to such development due to its central location, proximity to the River Torrens and access from Port Road. These encroachments along North Terrace resulted in large areas of Light’s original Park Lands being excluded from the National Heritage listing of the Adelaide Park Lands and City Layout in 2008.

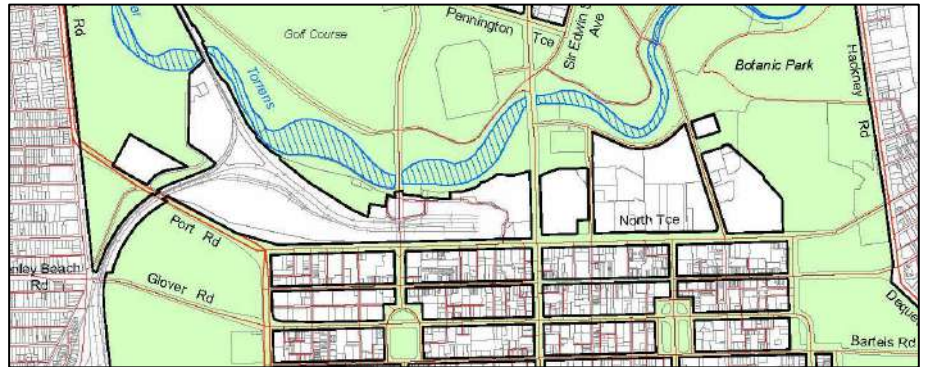


Figure 46 – Part National Heritage Place boundary, showing large areas of Light’s original Park Lands excluded from the National Heritage listing to the northern side of North Terrace due to historic encroachments [Source: DCCEEW 2022a]

Despite this large portion of alienated and excised Park Lands, Light’s 1837 Adelaide plan, including the layout of the two major city areas separated by the Torrens River, encircling Park Lands, six town squares, and the grid pattern of major and minor roads, are still readily discernible (refer figure below).

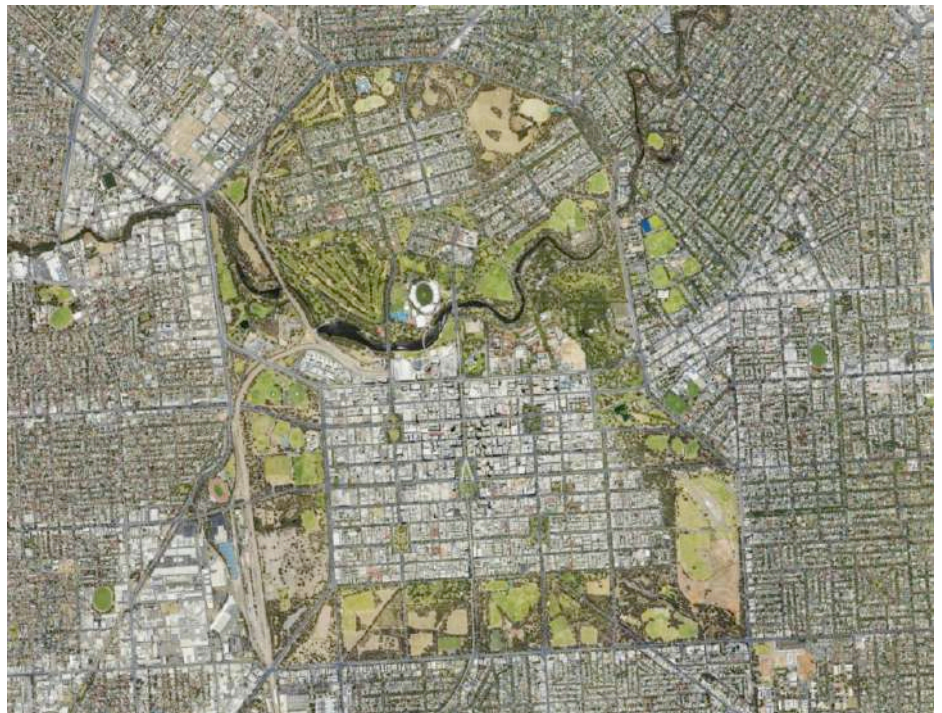


Figure 47 – Aerial view of Adelaide CBD and encircling park lands [Source: SAPP 2023]

7.0 Hospitals and Healthcare Context

7.1 Hospitals and Healthcare in the Park Lands

The South Australian Government has been responsible for the health and welfare of its citizens since European settlement in 1836. The first Colonial Surgeon, Dr Thomas Young Cotter, was appointed by the Colonisation Commissioners for SA in 1835 in England, prior to the proclamation of the new province in December 1836.²⁷

When Surveyor-General Colonel William Light published his plan for the City of Adelaide in 1837, it included a proposed location for a hospital in the east park lands (refer figure below). However, a hospital was not built in this location at the time.

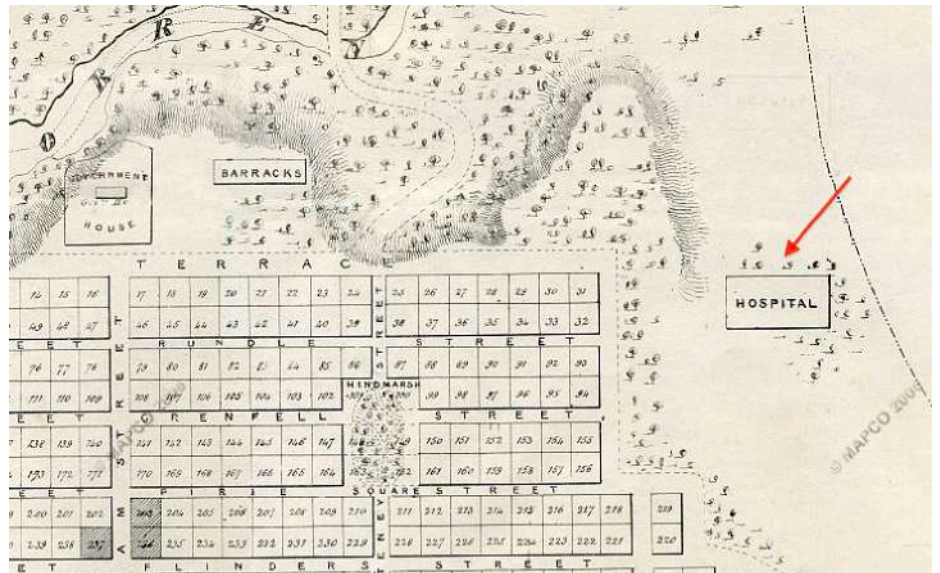


Figure 48 – Section of Light’s 1837 survey for Adelaide showing a hospital initially planned in the Park Lands [Source: Second report on Colonization of South Australia, House of Commons, 1837]

Between 1837 and 1840 the Colonial Surgeon worked out of several buildings that dispensed medical supplies and cared for patients within the city. The first hospital for Adelaide was a rudimentary wooden structure erected c1837 at Emigration Location (as it was known) in the west park lands (refer map below). The hospital facilities included around 40 other temporary wooden structures imported from England. The small hospital was poorly constructed and ventilated, and used for a short time. The site was also used for a few years as a women’s destitute asylum, to support new citizens with no financial means of support, after which time it closed. Indigenous people were treated at the ‘Native location’ in the west park lands, further to the north.²⁸

²⁷ McDougall and Vines 2014:3

²⁸ State Library of SA 2023; Adelaide Economic Development Agency 2023

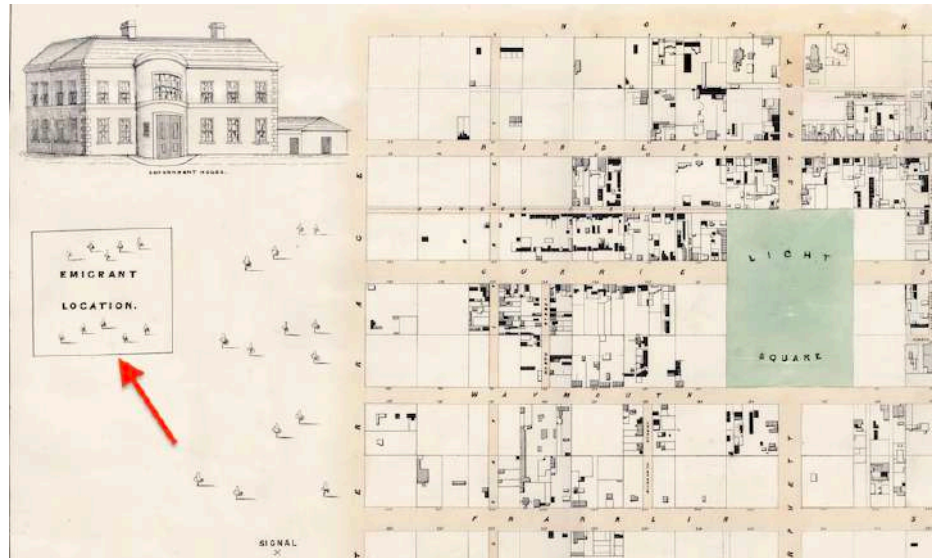


Figure 49 – Section of Kingston’s 1842 Map showing actual location of Emigration Square, which was the site of Adelaide’s first hospital [Source: SLSA, original by JC Hailes, London]

In 1840 the first permanent hospital for Adelaide was built close to the proposed location in Light’s 1837 plan, but north of Botanic Road, off Hackney Road. The Adelaide Hospital was a stone building and was officially opened in February 1841. This hospital, with some additions, served Adelaide until 1857.²⁹

In 1852 the Adelaide Lunatic Asylum opened between the eastern end of the Adelaide Hospital on North Terrace. The adjacent hospital building was used for a short time as part of the Lunatic Asylum, until that institution was moved to Parkside in 1870. After this time, the former hospital building was used for infectious diseases until it was demolished in 1938.³⁰

A new hospital was built in 1855-56 in stone on the western side of the Botanic Gardens in the park lands. This location became the Royal Adelaide Hospital (RAH) site on the corner of North Terrace and Frome Road. Various additions were made to this building complex in subsequent years, illustrated in the 1872 image below. Other buildings were constructed on the RAH site over subsequent years.³¹

²⁹ Painter 2023; McDougall and Vines 2014:5

³⁰ Painter 2023; McDougall and Vines 2014:5

³¹ McDougall and Vines 2014:5-33

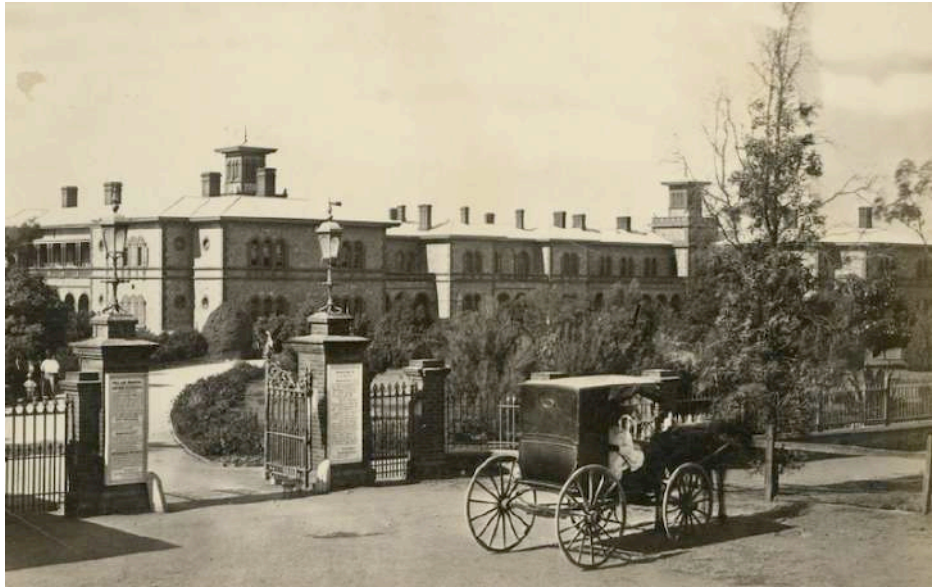


Figure 50 – Adelaide Hospital on the RAH site, 1872 [Source: SLISA, Image No. B_7868]

The first Adelaide Children’s Hospital was built in 1878, but for the first time it was located in one of the city’s land parcels in North Adelaide, not in the park lands. This became the location of the current Women’s and Children’s Hospital, with various subsequent buildings on this site (refer Section 7.2).

The 1880 map below (Figure 49) shows the locations of the 1840 Adelaide Hospital and 1852 Adelaide Lunatic Asylum on the corner of Botanic Road and Hackney Road, the 1856 Adelaide Hospital (later known as the RAH) on the corner of North Terrace and Frome Road, and the 1878 Adelaide Children’s Hospital in North Adelaide. The 1916 map below (Figure 51) shows the expansion of hospital buildings on the RAH site and the North Adelaide site, later known as the Women’s and Children’s Hospital (WCH) site.

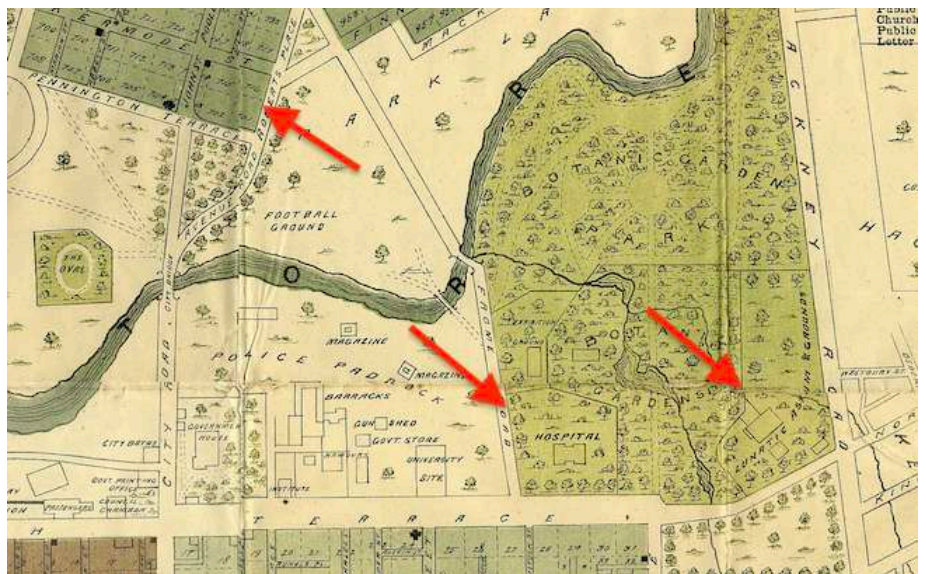


Figure 51 – Section of Fearson’s Plan of Adelaide, 1880 [Source: SLISA, Fearson & Bro., Adelaide]

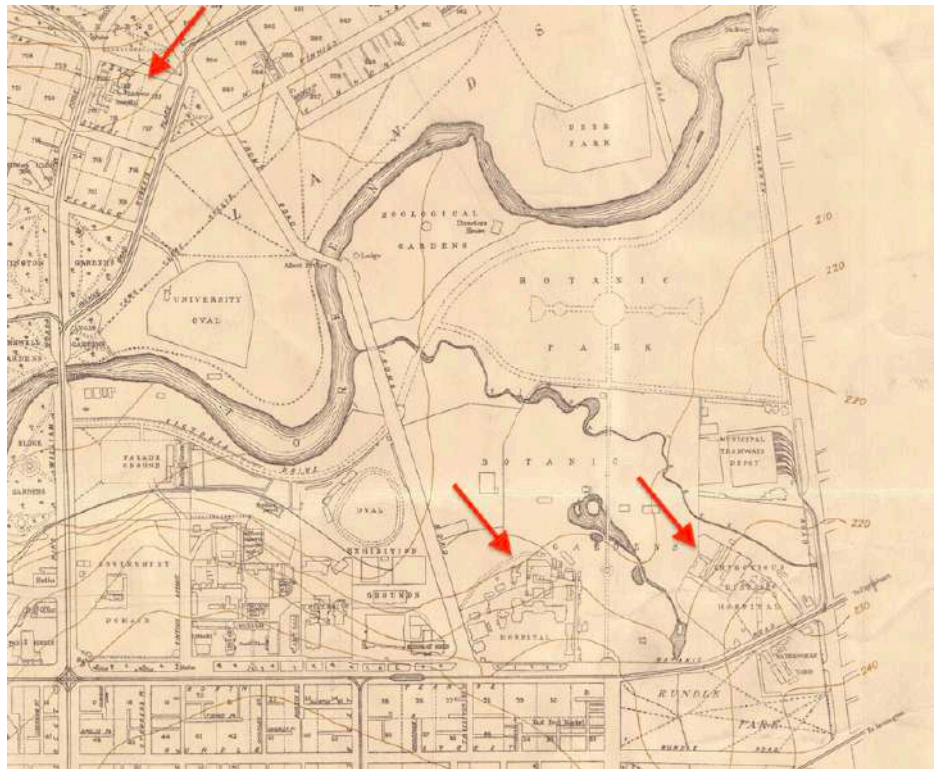


Figure 52 – Section of A. Vaughan's Plan of Adelaide, 1916 [Source: State Records of SA, GRG_35_0_3_28]; additions by author to show locations of hospitals

The RAH and WCH sites were the two public hospitals in the city throughout the late 19th century, the 20th century and early 21st century, expanding rapidly as the colony grew. In 2013 the State Government announced that a new RAH would be built and the RAH site opposite the Botanic Garden would no longer operate as a hospital. The new Royal Adelaide Hospital opened in 2017 on former railway land at the western end of North Terrace. The former RAH site (as shown on plan below) is being transformed with new uses, that includes the retention of State Heritage listed buildings in the south-west corner of the site.

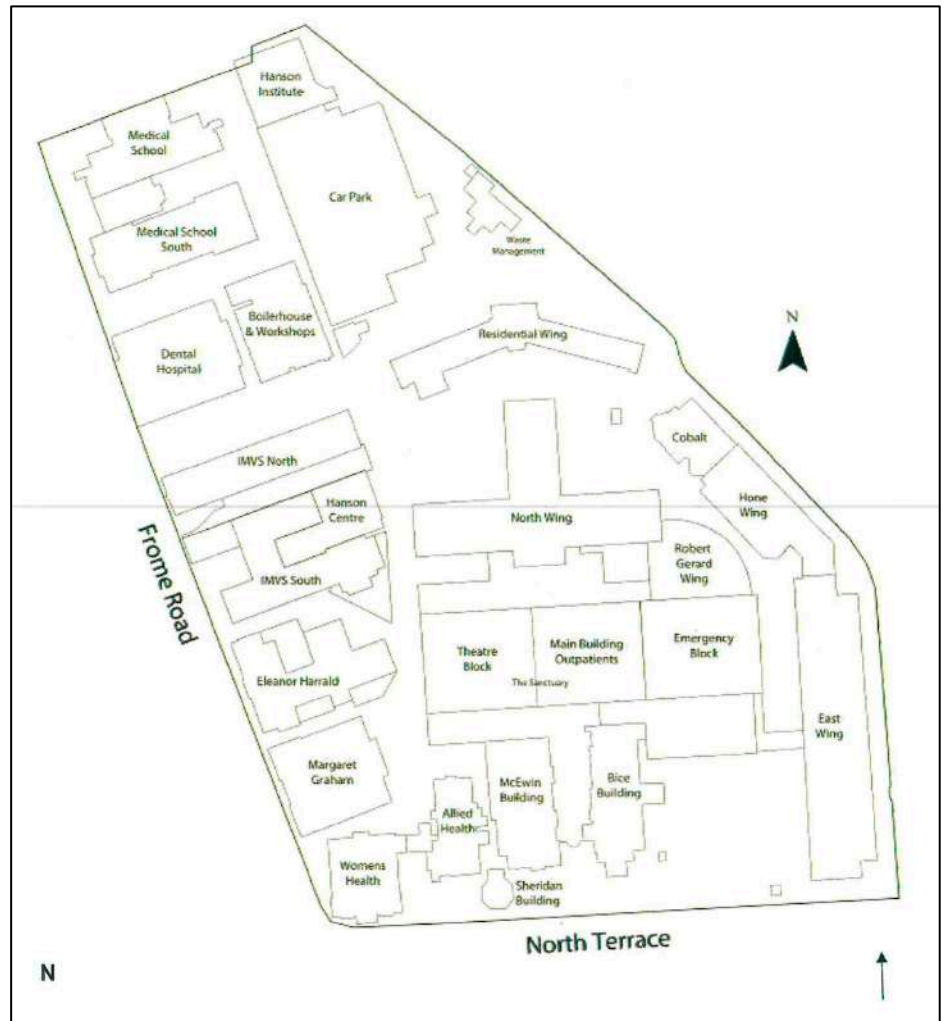


Figure 53 – RAH site plan, 2014 [Source: McDougall and Vines 2014:2]

7.2 Overview History of Women’s and Children’s Hospital

The need for a children’s hospital to address the poor quality of life and high premature death rates among poor and destitute children in the colony was established by a group of wives of prominent citizens in 1876. This group gained support of medical professionals and other influential people in the Colony. Land for the new Children’s Hospital was secured in one of the North Adelaide city blocks at the eastern end of Kermode Street overlooking the Parklands, and remains the current site Women’s and Children’s Hospital today.³²

The first Adelaide Children’s Hospital building was completed in 1878 and it was known as the Samuel Way Building. The Angas Building was built in 1893 fronting King William Street, and was named after philanthropist J.H. Angas.

³² Women’s and Children’s Hospital 2023

In 1897 Alan Campbell Building was constructed on King William Road and named after one of the founders of the Adelaide Children's Hospital. The hospital complex in North Adelaide consists of various buildings constructed at different periods, including the Good Friday Building, Clarence Rieger Building, Rogerson Building, Queen Victoria Building, and the new Samuel Way Building. A three storey Nurses' Home (known as the Mitchell Building) was built on the corner of King William Road and Brougham Place between 1944 to 1946 under otherwise war-time restrictions.³³



Figure 54 – Adelaide Children's Hospital (Samuel Way Building) in North Adelaide, 1894 [Source: SLISA, Image No. PRG_631/2/1238]



Figure 55 – Mitchell Building at the Adelaide Children's Hospital, 1952 [Source: SLISA, Image No. B_12324]

³³ Women's and Children's Hospital 2023; City of Adelaide 1983, Vol 6, pp.84-88

The Samuel Way Building was demolished in 1965. In 1986 the Angas Building and Allan Campbell Buildings were both individually State Heritage listed. In 1989 the Queen Victoria Hospital and the Adelaide Children's Hospital were amalgamated, creating the Women's and Children's Hospital. The photo below illustrates the block of various hospital buildings at the existing Women's and Children's Hospital site. ³⁴

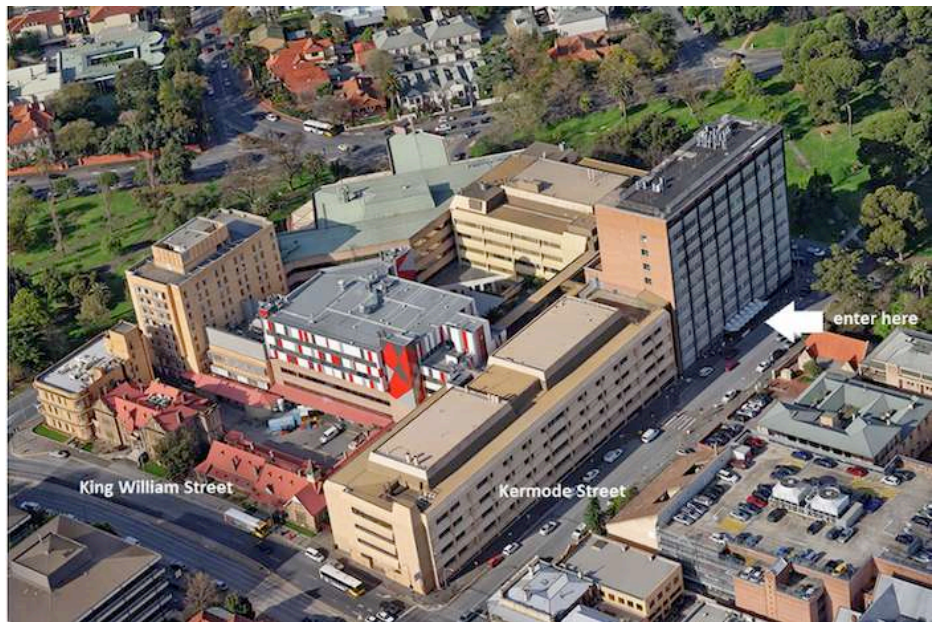


Figure 56 – Current view of Women's and Children's Hospital, North Adelaide [Source: University of South Australia 2023]

8.0 Context of Affected Locality

8.1 Overview History of Affected Locality

Shortly after European settlement of the new colony of South Australia in 1836, an area of the west park lands was established to 'bring together' European and Kaurna people. This area was known at the time as the 'Aboriginal (or Native) Location'. A Lutheran mission was established there, operating up until 1848 (refer Figure 57). Traditional camping grounds extended along the River Torrens, mostly on the northern side. ³⁵

By 1840, Adelaide Gaol was under construction in the west park lands, as can be seen in the 1842 plan below. Adelaide Gaol expanded in 1849. Olive trees were planted around the Gaol in the park lands. This area of the park lands was otherwise relatively sparse, with trees felled for construction and firewood, as can be seen from the 1865 Figure 59 below looking north-west towards the location of where the Thebarton Barracks would be built.

³⁴ Women's and Children's Hospital 2023

³⁵ DASH Architects and Peter Bell 2018:3-4,10-11



Figure 57 – Plan of area, 1842 [Source: Portion of Kingston Map of Adelaide, City of Adelaide Archives]

By 1849 the Corporation's cattle market yards were located south-east of the Gaol, off North Terrace. A slaughter house and the Slaughter Manager's Residence was built west of Adelaide Gaol. Colonial parliament passed an Act in 1851 that enabled construction of a railway line from Adelaide to Port Adelaide. The railway line to Port Adelaide was opened in April 1856, traversing the Affected Area. This would be the first government built and owned steamed railway in the British Empire.³⁶

By 1865 the City Gardener planned for the northern side of North Terrace and both the south and north sides of Port Road to be lined with trees, which were planted in the following two years (Figure 60). Other trees were also planted in this area of the park lands, including along both sides of the River Torrens, along Slaughter House Road and behind the cattle yards on North Terrace.³⁷

³⁶ Jones 2007:3.1.26, p.446; National Railway Museum 2023

³⁷ Jones 2007:3.1.26, p.446-450



Figure 58 – Plan of area, 1849 [Source: Portion of Freeling Map of Adelaide, State Records of SA, GRG 35/585/41]



Figure 59 – Duryea's 1865 photograph of Adelaide looking north-west from the Adelaide Town Hall [Source: State Library of SA, Image No. B5099/13 (part)]

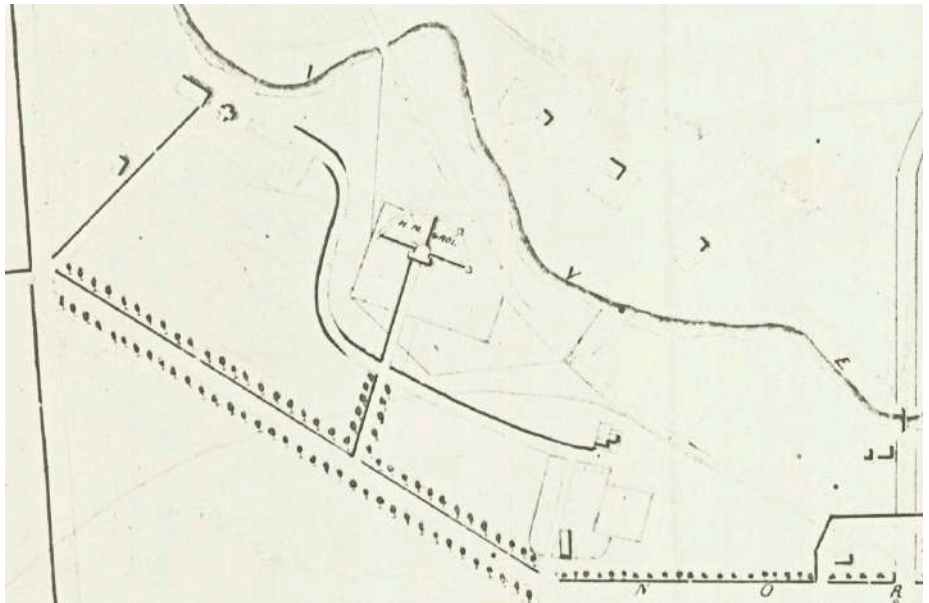


Figure 60 – Plan of area, 1865 [Source: Adelaide City Council Archives, Image No. J/42]

From the mid 1870s to mid 1920s several cottages were built along the western and southern edges of Adelaide Gaol to accommodate guards. These would be eventually demolished in 1971. ³⁸

In 1879 an area of the west park lands was excised by the colonial government under the *Adelaide Sewers and Water Works Amendment Act 1879* in the north-west portion of what is now known as Park 25 (Narnungga) for a SA Water depot, on the south side of Port Road. This land accommodated water and sewer infrastructure for over 100 years, but was remediated back to park lands in 2011. ³⁹

The Torrens Weir opened in 1881, replacing an earlier weir that was built by prison labour. The Powder Magazine was constructed north of the Gaol in 1882. From the 1880s several consecutive City Gardeners commenced a 'system of planting the Adelaide Park Lands' to the plan by John Ednie Brown. Around 600 trees of various species was planted in the west park lands in 1883, with large areas fenced the following year. Further plantings were undertaken in this area in the 1890s and 1900s, including around the edges of the River Torrens. There were several quarries set up along the banks of the river, such as limestone, sand and gravel. ⁴⁰

The embankments of the River Torrens near the slaughterhouse were also historically used for waste and rubbish dumping. In 1903 the Corporation reviewed all depots and rubbish tips in the park lands and recommended various closures. A permanent waste depot was recommended at the Sheep Market on North Terrace. Hedging was added around all depots and dumps in the park lands. ⁴¹

³⁸ Jones 2007:3.1.26, p.450

³⁹ Jones 2007:3.1.24, pp.377; *The Advertiser* 24 August 2011

⁴⁰ Jones 2007:3.1.26, p.460-466

⁴¹ Jones 2007:3.1.26, p.466

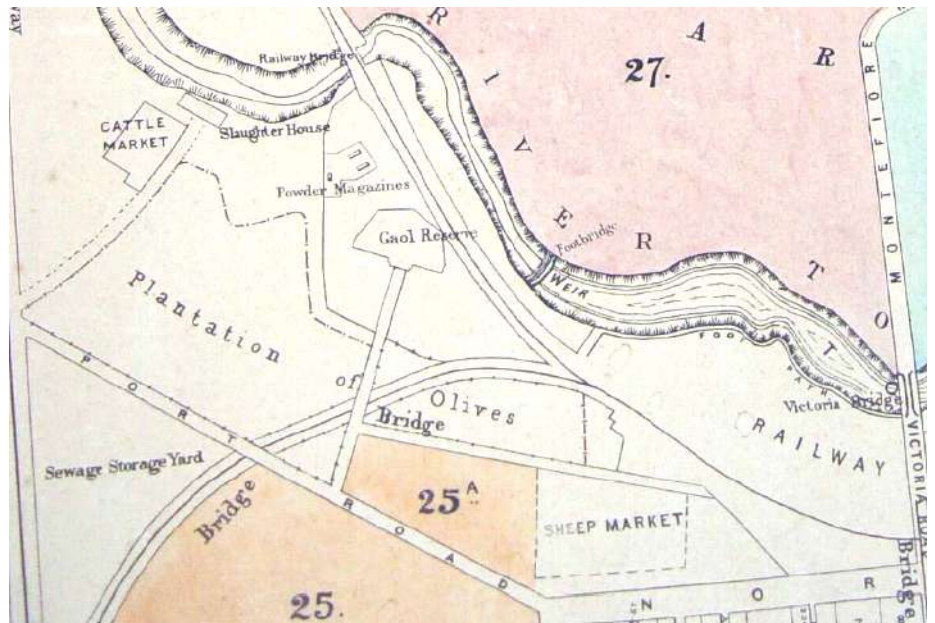


Figure 61 – Plan of area, 1895 [Source: Depasturing Map of Adelaide, City of Adelaide Archives]

Port Road was widened around 1903, and fences along the edge were moved. Additional trees were planted along North Terrace west. The slaughter house west of the Gaol was eventually closed and demolished in 1915, as one was opened several years earlier at Gepps Cross. Following the demolition of the slaughter house building, the slaughter house Manager's Residence was used as a Ranger's Cottage in association with the West Nursery. The cottage would be demolished in 1968.⁴²

The freight railway line was built in 1908-1909 and changed access to the Gaol, markets and the alignment of the roads to these places. The *Adelaide Parklands Alteration Act* was passed in 1913, which enabled the Commission of Public Works to take possession of an area of the park lands towards the western end of North Terrace for additional railway land for marshalling and service yards (Area A, Figure 62) and for a police barracks (Area B).⁴³

⁴² Jones 2007:3.1.26, p.459-461,467-8

⁴³ Swanbury Penglase Architects 2003:11,15,18,42,48

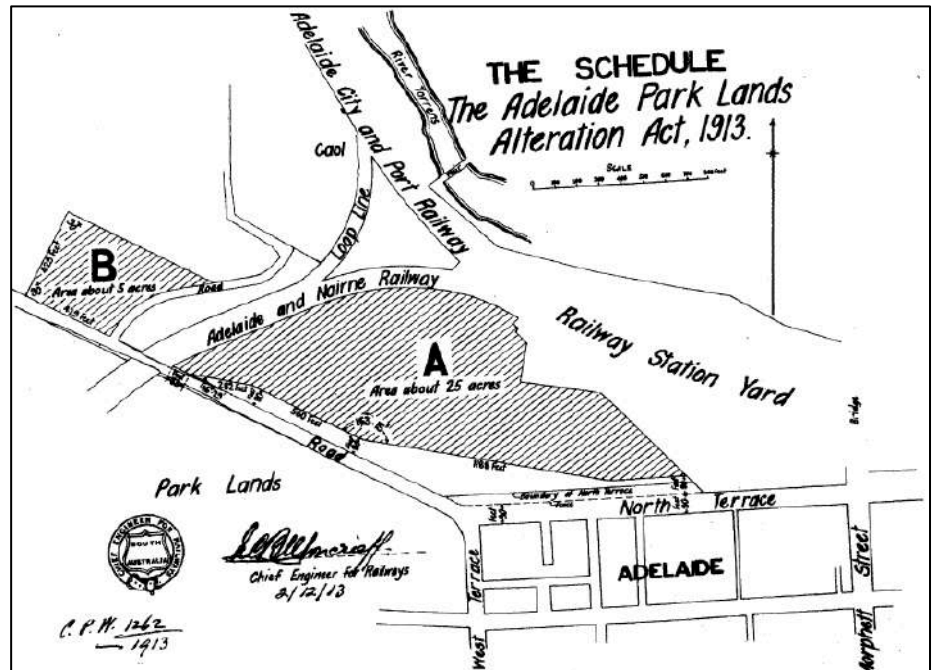


Figure 62 – Excised land from the Park Lands, 1913 [Source: Schedule in The Adelaide Park Lands Alteration Act 1913]

Construction for the new Thebarton Police Barracks on Port Road began in 1915. By 1916 various buildings were completed, with a parade ground among remaining olive trees (refer Figure 63 below). Thebarton Barracks was officially opened on 1 March 1917, accommodating the South Australian Mounted Police and their horses, and the ambulance service.⁴⁴

The Barracks complex originally included administrative quarters, dormitory, kitchen/mess, parade ground, with two stables groups, chaff mill, farriery, saddlery, exercise circuit, Quarantine shed, and an Inspectors residence to the east of the main complex. The primary architectural style was Edwardian.⁴⁵

⁴⁴ Swanbury Penglase Architects 2003:15-19

⁴⁵ Jones 2007:3.1.26, p.469

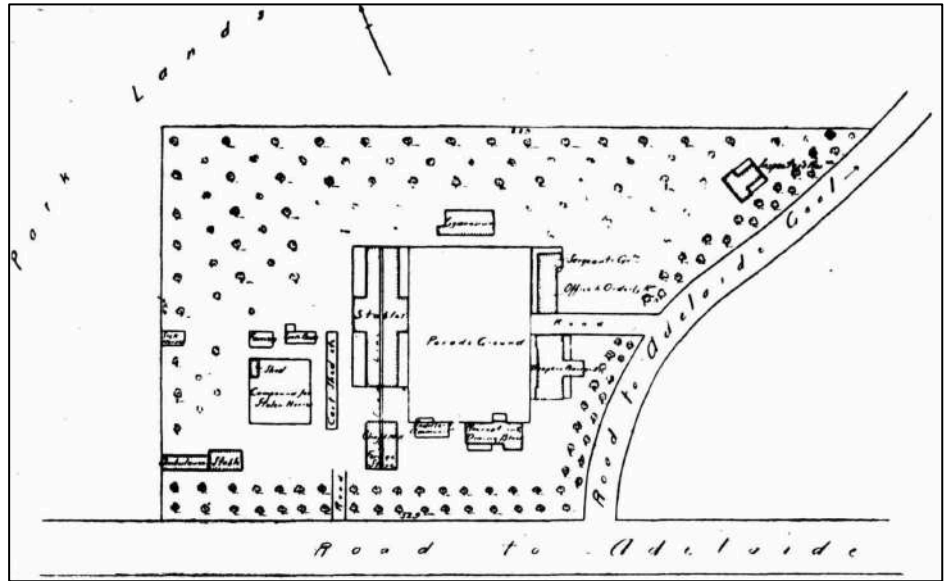


Figure 63 – 1916 plan of Mounted Police Barracks [Source: *Adelaide Observer*, 29 July, p.20]

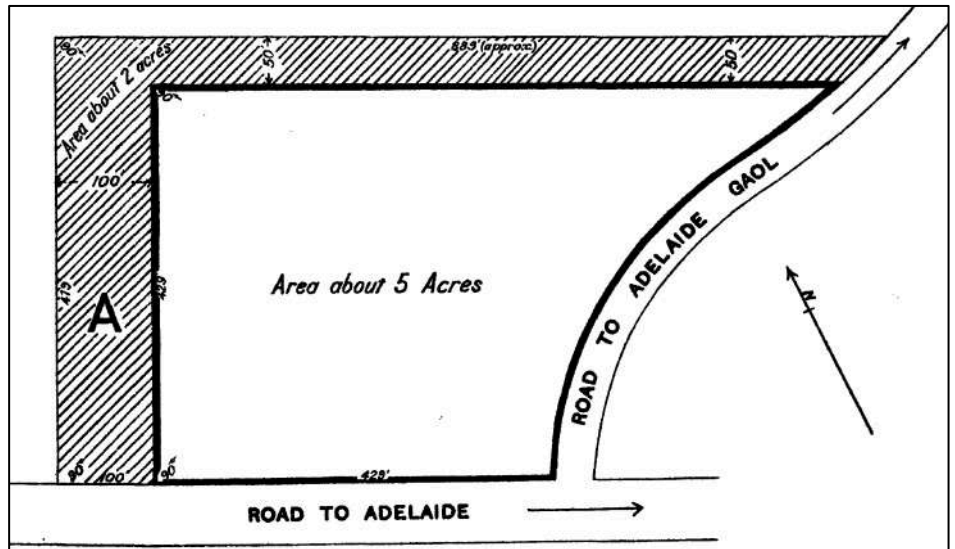


Figure 64 – Area of Park Lands acquired for new Police Barracks and additional hatched area to paddock horses [Source: *Adelaide Parklands Alteration Act 1917, Schedule 1*]

A new railway bridge over the River Torrens was added in 1910-1911, several metres from the original bridge. The Corporation removed 150 Olive trees adjacent the railway line during 1912 that were obstructing the view of railway signals.⁴⁶

City Gardener August Wilhelm Pelzer had access to the entire area of what now forms Bonython Park by 1913, however no landscape works were undertaken until 1917. The land was mostly used as agistment paddocks. While Lord Mayor John Lavington Bonython announced in 1913 that this area could be used by sporting clubs, it appears that other parts of the park lands

⁴⁶ Jones 2007:3.1.26, p.468

were prioritised. Various parts of the park lands were planted with areas of experimental trees to see if they would grow for 'timber purposes' in 1917. ⁴⁷

In 1915 the Western Yard Entrance (WYE) Signal Cabin was erected in the now triangular land east of the gaol between the railway lines. In 1919 War Memorial Drive was proposed as a carriageway on the northern side of the River Torrens, and trees were planted along it. In 1920 a small area of what would later be Bonython Park was planted with trees, and Ash trees were planted along the northern side of Port Road west. Olive plantations in this area were still being harvested into the 1920s by the Gaol. ⁴⁸

In 1928 the Corporation installed a white granite memorial structure with a brass plaque on the corner of North and West Terraces within Park 27 (Tulya Wardli) to honour the survey point of Adelaide and the location of the first colonial Lands and Survey offices. Various trees were planted within parks and along roads in this area over following years. ⁴⁹

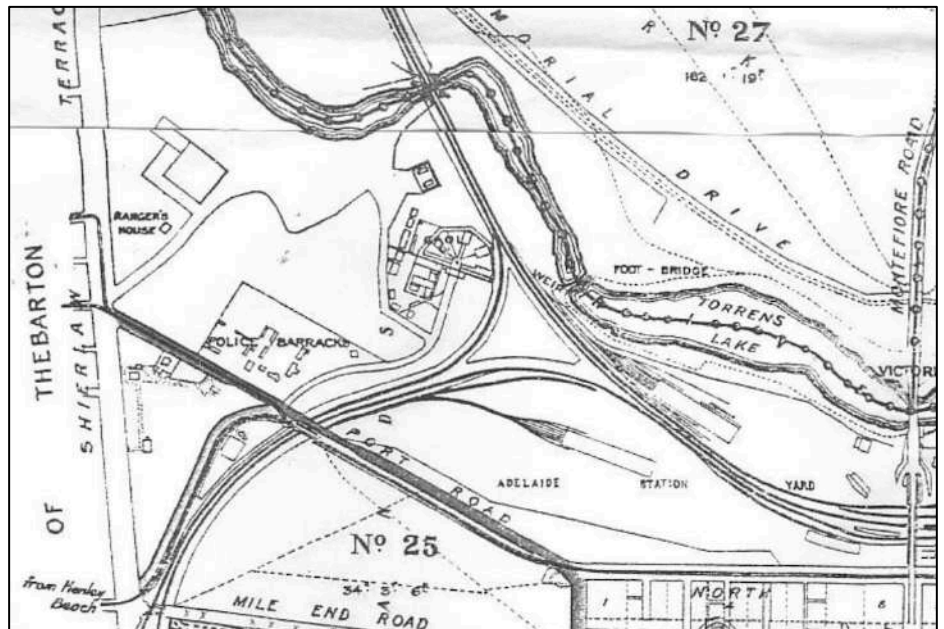


Figure 65 – Improvements plan, 1927 [Source: ACC Archives in Jones 2007:3.1.26, p.471]

⁴⁷ Jones 2007:3.1.26, p.468-469

⁴⁸ Jones 2007:3.1.26, p.470

⁴⁹ Jones 2007:3.1.26, p.471-472



Figure 66 – Aerial photograph, November 1935 [Source: Geosciences Australia]

The SA Mounted Police were originally responsible for rural police stations. Horses were used less by the police from the mid 1930s. Motor cycles started to be used by the Police Force in 1922, initially being stored in the city, later being transferred to the Thebarton Barracks site (at the eastern end of Park 27, Tulya Wardli). There were various additions to the Barracks site including a shelter shed in 1922, a new Quartermaster's Store behind the saddlery in 1935, a large Dormitory in 1937 (later used by the Star Force as their headquarters), a Gymnasium in 1937, and additions to the kitchen block in 1938-39. From the 1940s, Thebarton Barracks became the main Police training facility. The Gaol Road entrance was remodelled around 1945.⁵⁰

In 1940 the Corporation approved a yearly lease of 5 acres of land adjoining the Police Barracks 'for use as a sporting ground by Police trainees' with a cyclone fence erected of no more than 1.2 metres in height. Several changes occurred within the Police Barracks site in the 1950s with the old Chaff Mill converted to a Motor Mechanics Workshop in 1951, the old Stables annex was converted into a Motor Transport workshop in 1954, and the Traffic Division accommodation building was built in 1958.⁵¹

Changes to the nature of policing in the 1950s saw an increase in patrol cars and decline in the use of horses. By 1946, all horses had disappeared from country stations and those remaining were housed at Thebarton Barracks. Horses began to share the site with police cars, and buildings were adapted to suit new uses, such as the Traffic Branch. New buildings were erected at Thebarton Barracks in the 1950s and 1960s. From 1956, all Foot and Mounted Police officers were referred to as Police Constables. Police training was transferred to a facility at Fort Largs in 1962. In 1974 the Police Dog

⁵⁰ Swanbury Penglase Architects 2003:22-26; Jones 2007:3.1.26, p.469-472

⁵¹ Jones 2007:3.1.26, p.472

Patrol Squad was established and in 1978 the STAR Force was formed, with both units being accommodated at Thebarton Barracks.⁵²

William Veale was appointed Town Clerk in 1947. Veale was an enthusiastic amateur gardener with no professional qualifications yet he played a major role in everything that happened in the park lands during his tenure. In the 1950s Veale planned the golf course and the Torrens Weir Restaurant on the northern side of the Torrens, and a shallow lake and playground for Park 27 (Tulya Wardli) in the area adjacent the 'lake ponds' (between the River and Barracks site).⁵³



Figure 67 – Aerial of area showing Mounted Police Barracks (foreground) surrounded by olive trees, c.1955 [Source: State Library of South Australia, Image No. PRG 1712/3/53]

West Terrace was widened in the 1960s and sporting facilities in the park lands increased in numbers. Bonython Park (north and west of Thebarton Barracks) underwent major earthworks, contouring, grading of the banks and new landscape plantings between 1962 and 1967. Bonython Park was officially opened in 1964 as a new formal landscape with recreational spaces, comprising a 17 hectare park with connections under the rail lines to the River Torrens. This connection, along with the provision of car parking and other amenities, saw the recreational use of the park lands in this locality significantly increase.⁵⁴

Between 1965 and 1968 Port Road was further widened, Carey Gully stone walling was erected along the newly created embankments of the Torrens, the road to the former Slaughterhouse (now the Ranger's Cottage) was closed and grassed and the Ranger's Cottage was demolished. Veale's master plan for the changes to Bonython Park included the provision for a permanent site to host visiting circuses, the first being held in 1961. Extensive tree planting in Bonython Park was undertaken in the 1960s, both along the river and in clumps within the west park lands.⁵⁵

⁵² Swanbury Penglase Architects 2003:29-33

⁵³ Jones 2007:3.1.26, p.474-476

⁵⁴ Jones 2007:2.0, pp.80; Jones 2007:3.1.26, p.476; City of Adelaide 2013, Chapter 7, p.

⁵⁵ Jones 2007:3.1.26, p.476-478

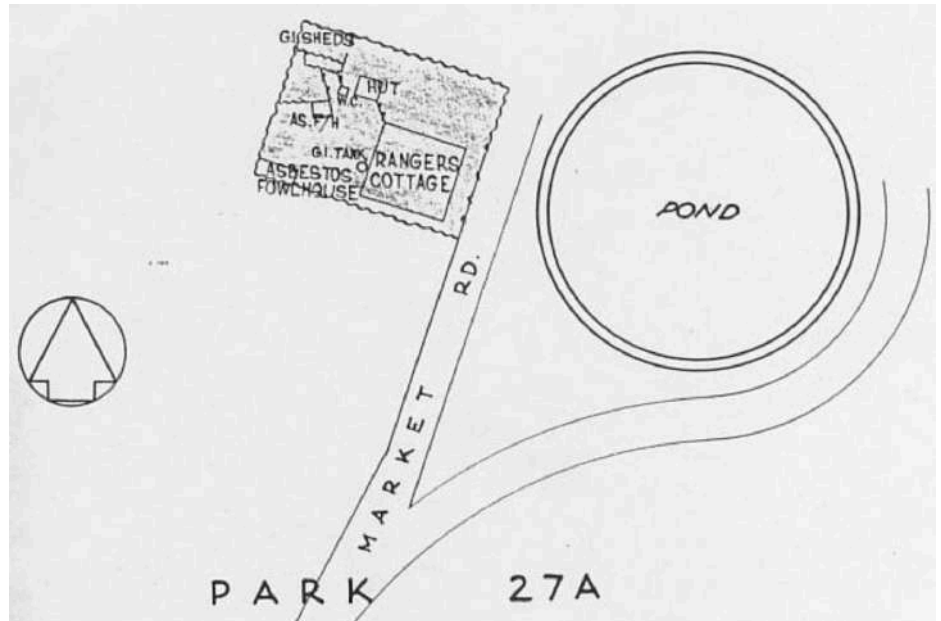


Figure 68 – Plan showing location of Rangers Cottage and road before demolition adjacent to the new pond in Bonython Park, c1965 [Source: ACC Archives in Jones 2007:3.1.26, p.477]

By 1971 most of the gaol cottages along Slaughter House Road were demolished due to security problems associated with their proximity to the gaol. Adelaide Gaol officially closed as a prison in early 1988, however it reopened the same year as a place of cultural tourism. The 1980s also saw a new railway bridge across the River Torrens.⁵⁶

Various changes occurred at the Thebarton Barracks in the 1980s with new buildings constructed and existing buildings upgraded for different Police purposes. In 1996 the South Australian Police Historical Society, initially formed in 1978, was relocated from its site on North Terrace to the Thebarton Barracks location. Since 1917, the Police operations at Thebarton Barracks have responded to changing technology and population growth. Mounted Police have continued to be used for city parades, patrol and crowd control. The figure below shows the buildings at the site in 2003, the year a Conservation Management Plan was prepared to guide management of the site's heritage values.⁵⁷

⁵⁶ Scheiffers 2002:124-125; Jones 2007:3.1.26, p.478

⁵⁷ Swanbury Penglase Architects 2003:34-36

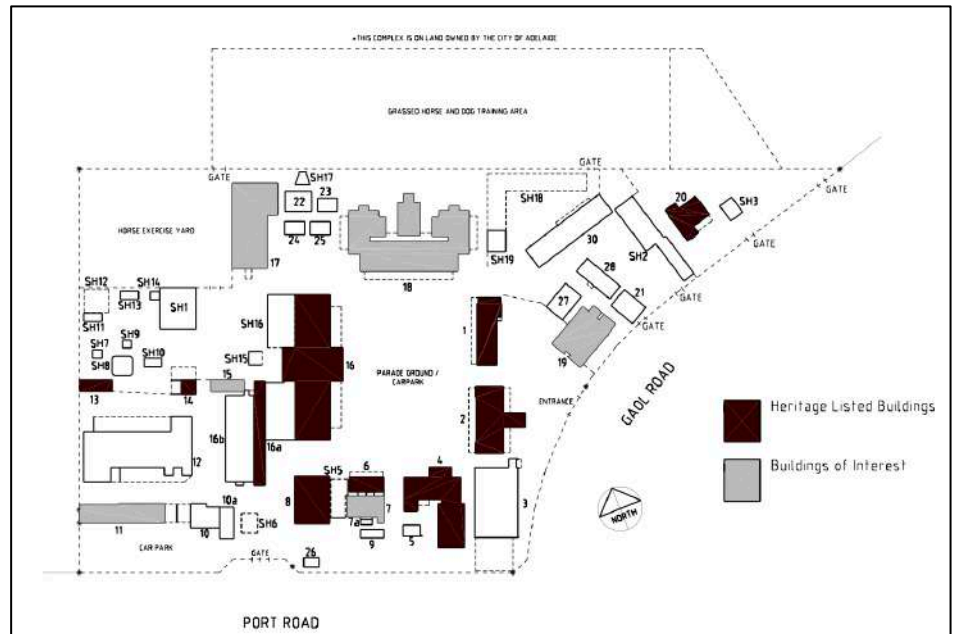


Figure 69 – Thebarton Barracks site plan, 2003 [Source: Swanbury Penglase Architects 2003:257]

The train marshalling yards at the western end of North Terrace remained disused from the 1980s up until 2013 when The South Australian Health and Medical Research Institute (SAHMRI) was opened. This was followed shortly after by the University of Adelaide’s Adelaide Health and Medical Sciences Building and the University of South Australia’s Bradley Building on the south side of the existing railway lines. These buildings on the north side of North Terrace, at its western end, form what the State Government term the Health and Adelaide BioMed City precinct.

A tramline was built along North Terrace to the Entertainment Centre in Hindmarsh as an extension of the Adelaide to Glenelg Tram in 2010. The Road Safety Centre was relocated directly west of Thebarton Barracks in 2013.⁵⁸

The new Royal Adelaide Hospital was constructed between 2012 and 2017. The land between the Thebarton Barracks and Adelaide Gaol, and the narrow land on the east side of Gaol Road was named Kate Cocks Park in 2017 after a prominent advocate for women and the first female police constable in the British Empire.⁵⁹

8.2 Integrity of Affected Locality

The affected area has been subject to more utilitarian uses and encroachments than most other perimeter portions of Adelaide Park Lands. Its location along the historically important connection to Port Adelaide has likely been a significant contributing factor. For over a century development along Port Road through the Park Lands effectively connected bridged the otherwise continuous Park Land green belt encircling the City. This is evident

⁵⁸ *The Advertiser* 2013, 25 Feb

⁵⁹ Mosler 2006; Adelaide Park Lands Association 2023

in Figure 70 (2008), where the SA Water Depot, Thebarton Barracks, Adelaide Gaol, freight rail line, and the railway marshalling yards effectively interconnect. The decommissioning of the SA Water site in 2011, and its remediation back to landscaped Park Lands was a major initiative to remedy this, as evident from Figure 71 below.

Despite this initiative, the integrity of the encircling Park Lands in this location remains compromised. This is particularly the case for the land within the immediate proximity of the Project Site. As noted in Section 6.0, historic encroachments to the north of North Terrace resulted in large areas of Light's original Park Lands being excluded from the National Heritage listing in 2008. This includes large areas of, and surrounding the project site.



Figure 70 – Aerial of area, 2008 [Source: Google Earth]



Figure 71 – Aerial of area, 2015 [Source: Google Earth]

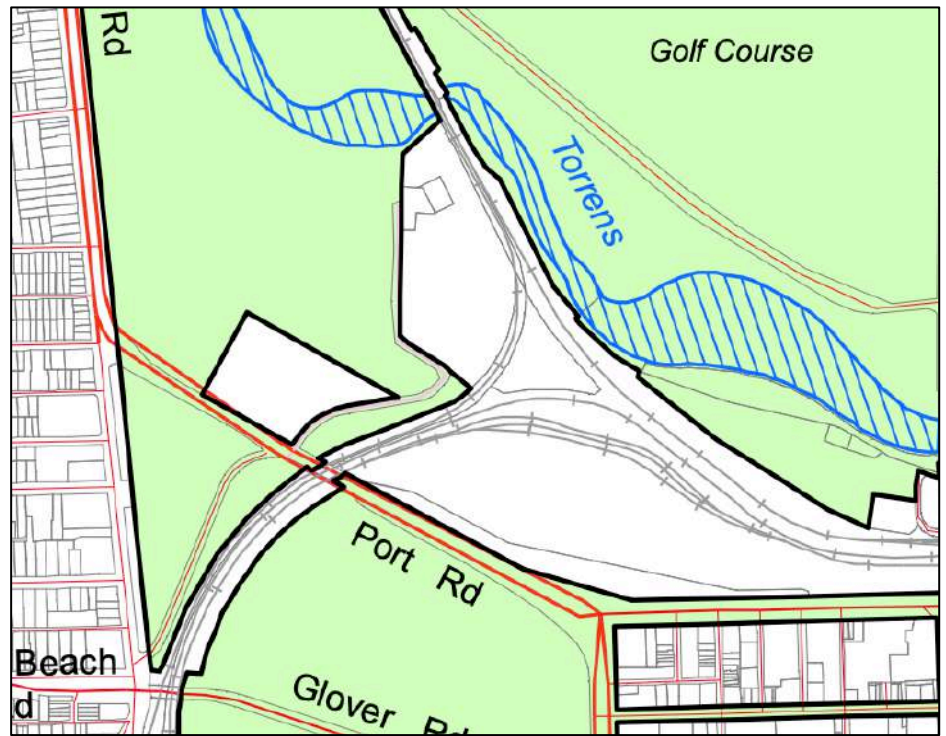


Figure 72 – Part National Heritage Place boundary, showing large areas of Light's original Park Lands excluded from the National Heritage listing along Port Road due to historic encroachments [Source: DCCEEW 2022a]

8.3 Use and Accessibility

The Park Lands have never had a single use in theory or practice. Light's original 1837 plan identified a range of government institutions within these areas, including Government House, a store house, school, hospital, barracks, market and cemetery. These functions, essential for a new Colony, needed to be accommodated somewhere and it was likely undesirable to locate them on saleable land. Over time, these functions expanded with the growth and modernisation of the City, as did the associated encroachments into the Park Lands.

The social and cultural values of the Park Lands have increased over the years, culminating in its National Heritage listing in 2008. The cultural importance of the Park Lands over time is discussed in numerous publications, especially in the cultural landscape study by David Jones (2007) and the social history of the Park Lands by Patricia Sumerling (2011).

Reconciling the tensions between 'utilitarian' and 'recreational' uses is challenging. These terms at times overlap and may mean different things to different people. A grandstand, for example, supports the recreational use of the Park Lands but could similarly be considered a utilitarian structure. A wetland could be considered a recreational use, but has utilitarian functions. Irrespective of how they are defined, the encroachment of utilitarian uses within the Park Lands has steadily increased to the point that the 2008

National Heritage listing excluded large areas of alienated 'original' park land between North Terrace and the River Torrens, and along the Port Road through the western Park Lands.

The National Heritage listing recognises the importance of historic utilitarian functions of the Park Lands, as they were identified in Lights 1837 Plan, albeit most of these are located within the alienated land excised from the listing. Other 'encroachments', such as the Zoological Gardens, Botanic Gardens and Adelaide Oval, unquestionably contribute towards the social and cultural values of the National Heritage Place. 'Encroachments' such as the Goodman Building (and former Tram Barn), the Torrens Weir, the Museum of Botany (Botanic Gardens) and Adelaide High School, have gone on to be listed as State Heritage Places for their own cultural significance. There are over 70 individual State Heritage Places within the Adelaide Park Lands and Squares.

As a consequence, reconciling changes in use of the Park Lands, especially from 'recreational' to 'utilitarian', is complex, with corresponding attributes of National Heritage significance regularly in tension with each other. The Heritage Management Plan currently being prepared for the Adelaide City Council will likely assist managing and balancing these matters. Until then, we can only have regard to the National listing itself.

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.

As outlined in Section 8.1 (above), historic colonial land uses within the proximity of the site include:

- Indigenous campsite (1840s)
- plantation of olive trees (from 1840s)
- Adelaide Gaol (from 1840 to 1988, then place of heritage tourism)
- cattle market and yards (from 1840s to 1910s)
- slaughter house (from 1840s to 1910s)
- railway station yards (from 1850s to 1980s, railway lines remain)
- Torrens Weir built (1881)
- Powder magazine built (1881)
- quarries along river bank (from 1830s to 1850s)
- rubbish dumps (1850s to 1900s) then refuse destructor (1910 to 1950s)
- Thebarton Police Barracks including agistment of police horses in olive grove (1910s to present)
- agistment paddocks (1910s)
- Torrens Weir Restaurant built and golf course (1950s)
- Bonython Park established (1960s to present)
- establishment of various medical buildings on north side of North

Terrace (from 2010s)

- tramline built along North Terrace and Port Road (from 2010)
- road safety centre established (2013 to present)

8.4 Landscape Character

Whilst the Adelaide Park Lands are a single feature, its landscape character varies greatly from area to area. This diverse landscape character is a recognised attribute of the National Heritage listing. As illustrated in the figure below, some areas are laid out as formal or semi-formal gardens, others have sporting uses (hard and turf surfaces), and other areas have a less formal character. Various built form supports this diverse landscape character and its associated uses, ranging from smaller sporting field facilities to larger complexes such as Adelaide Oval, Adelaide Aquatic Centre and Adelaide High School.

This landscape character was last mapped in 2018. Ongoing curation of the Park Lands, and a series of minor and major projects, has seen this landscaped character evolve further since, including:

- the South Parklands Stormwater Project (2019) in the South park Lands
- the Adelaide Botanic High School development in the east Park Lands (2022)
- the proposed New Women's and Children's Hospital in the west Park Lands and
- the relocated Adelaide Aquatic Centre in the northern Park Lands.

Project Site land within the boundary of the National Heritage Place is identified by the City of Adelaide as "informal landscape". A more detailed summary of the landscape character of the locality is provided in Section 4.2 of this report. This National Heritage Impact Assessment does not consider ecological or biodiversity impacts. We understand that any potential such impacts are being advised on separately by an appropriate specialist.



Figure 73 – Landscape Character Map of Adelaide Park Lands and City Layout National Heritage listing [Source: DASH Architects 2018:40]

9.0 Summary of Obligations under the EPBC Act

This Section outlines EPBC Act obligations and provides a summary of the self-assessment and referral process.

9.1 EPBC Act / SIG 1.1 Guidelines

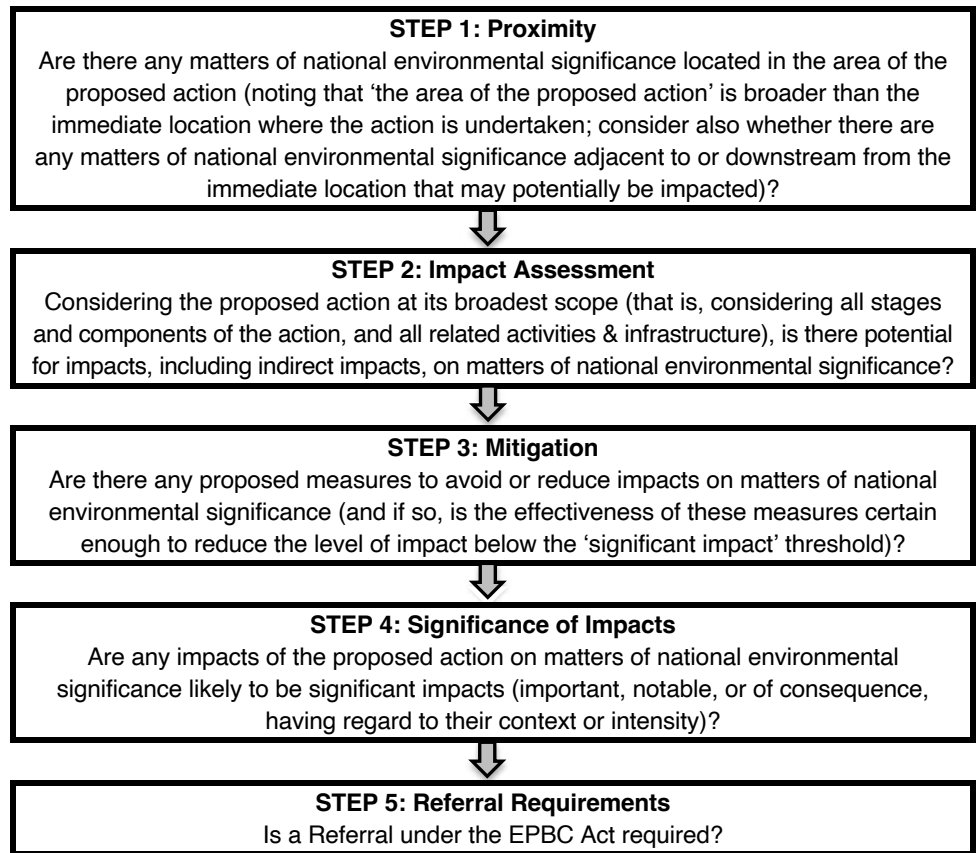
In broad terms under the EPBC Act, any action that a person takes that 'will have or is likely to have' a 'significant impact' on a matter of 'national environmental significance' requires referral to the Department of Climate Change, Energy, the Environment and Water (Com) (DCCEEW) to determine whether the action is:

- Clearly Unacceptable: This decision means that your proposed action has, or will have, a clearly unacceptable impact on protected matters.
- Controlled Action: This decision means that your proposed action has, or will have, a significant impact on protected matters.
- Not a Controlled Action – Particular Manner: This decision means that the particular manner in which you proposed to take your action ensures that it won't, or isn't likely to, have a significant impact on protected matters, or
- Not a Controlled Action: This decision means your proposed action is unlikely to have a significant impact on protected matters.

With respect to this project, the matter of 'national environmental significance' is 'The Adelaide Park Lands and City Layout'.

The DCCEEW publication 'Matters of National Significance, Significant Impact Guideline 1.1' (SIG 1.1 Guidelines) outlines the self-assessment process and detailed criteria to assist a person undertaking an action to decide whether or not a referral may be required. This process is illustrated below and described in greater detail under the following sections.

Step by Step Self-Assessment Process



9.2 SIG 1.1 Definitions

The following definitions from the 'Matters of National Significance, Significant Impact Guideline 1.1' (SIG 1.1 Guidelines) provide context to the self-assessment and referral process in the following sections of this report.⁶⁰

What is an action?

'Action' is defined broadly in the EPBC Act and includes: a project, a development, an undertaking, an activity or a series of activities, or an alteration of any of these things. Actions include, but are not limited to: construction, expansion, alteration or demolition of buildings, structures, infrastructure or facilities; industrial processes; mineral and petroleum resource exploration and extraction; storage or transport of hazardous materials; waste disposal; earthworks; impoundment, extraction and diversion of water; agricultural activities; aquaculture; research activities; vegetation clearance; culling of animals; and dealings with land.

Actions encompass site preparation and construction, operation and maintenance, and closure and completion stages of a project, as well as alterations or modifications to existing infrastructure.

⁶⁰ Department of the Environment 2013a:2

An action may have both beneficial and adverse impacts on the environment, however only adverse impacts on matters of national environmental significance are relevant when determining whether approval is required under the EPBC Act.

What are matters of national environmental significance?

The matters of 'national environmental significance' are:

- world heritage properties
- national heritage places
- wetlands of international importance (often called 'Ramsar' wetlands after the international treaty under which such wetlands are listed)
- nationally threatened species and ecological communities
- migratory species
- Commonwealth marine areas
- the Great Barrier Reef Marine Park
- nuclear actions (including uranium mining)
- a water resource, in relation to coal seam gas development and large coal mining development.

What is a significant impact?

A 'significant impact' is an impact which is important, notable, or of consequence, having regard to its context or intensity. Whether or not an action is likely to have a significant impact depends upon the sensitivity, value, and quality of the environment that is impacted, and upon the intensity, duration, magnitude and geographic extent of the impacts. You should consider all of these factors when determining whether an action is likely to have a significant impact on matters of national environmental significance.

When is a significant impact likely?

To be 'likely', it is not necessary for a significant impact to have a greater than 50% chance of happening. It is sufficient if a significant impact on the environment is a real or not remote chance or possibility. If there is scientific uncertainty about the impacts of your action and potential impacts are serious or irreversible, the precautionary principle is applicable. Accordingly, a lack of scientific certainty about the potential impacts of an action will not itself justify a decision that the action is not likely to have a significant impact on the environment.

What is a referral?

'Referral' of an action involves filling out a referral form and sending it to DCCEE. A referral identifies the person proposing to take the action and includes a brief description of the proposal, the project location, the nature and extent of any potential impacts, and any proposed mitigation measures.

9.3 Cumulative Impacts

A cumulative impact may result from past and current activities, which over time have combined to collectively have a 'significant' and adverse impact to a place's National heritage values.

It is problematic to consider the potential cumulative affect of minor impacts under the EPBC Act and SIG 1.1 Guidelines as projects are considered on a project-by-project basis. This shortcoming was identified in Professor Graeme Samuel AC's Independent Review of the EPBC Act (2020) that noted:

*Cumulative impacts on and threats to the environment [including National heritage] are often not well managed under the current settings of the EPBC Act. Administration of the EPBC Act has contracted to core statutory requirements, with a focus on project-by-project assessment and approvals. Individually, developments may have minimal impact on the national environment, but their combined impact can result in significant long-term damage. Where assessed, the impacts are most often considered in isolation of other current or anticipated projects. These project-level decisions fail to fully factor in other pressures on the environment, resulting in an underestimation of the broadscale cumulative impacts on a species, ecosystem or region..*⁶¹

This review went on to provide the following recommendation:

*Recommendation 25: In the second tranche of reform, the EPBC Act should be amended to support more effective planning that accounts for cumulative impacts and past and future key threats and build environmental resilience in a changing climate...*⁶²

It is our understanding that such reforms are still being considered and are yet to be implemented. As a result, this assessment will consider any potential National Heritage Impact in isolation of any unrelated previous projects or other current projects. It is noted, however, that since the National Heritage listing in 2008 there have been over 15 referrals to the Commonwealth Government under the EPBC Act for the Park Lands. Each one of these actions are assessed on their individual merit. 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.

The 2018 Issues and Opportunity Analysis report for the Adelaide Park Lands prepared by DASH Architects included various recommendations to address the identified issues associated in managing the National Heritage values of the place. One of these recommendations was to track and monitor trends in

⁶¹ Samuel 2020:127

⁶² Samuel 2020:32

relation to use and associated landscape character of the place, to account for impacts of cumulative change that may be inconsistent with the places National Heritage values.⁶³ It would be appropriate for the Heritage Management Plan (currently being prepared) to propose mechanisms to monitor and track these trends and potential cumulative impacts.

9.4 Self-Assessment & Referral Process

The SIG 1.1 Guidelines outlines a step-by-step process with various questions that assist in undertaking a self-assessment to decide whether or not the action is likely to have a significant impact on the National Heritage Place, and whether a referral is required. This NHIA will inform the self-assessment process.

If following completion of the self-assessment process, it is concluded that a particular action 'will have or is likely to have' a 'significant impact' on the National Heritage Place, then the action should be referred to the Minister for assessment under Section 68 of the EPBC Act. Penalties apply for not referring an action that will or is likely to have a significant impact to a matter of 'national environmental significance'.⁶⁴

DCCEEW offers pre-referral meetings as an option to discuss the assessment and approval process, and to further understand potential project impacts, obligations under the Act and costs for referral.

After receiving a referral, the Minister will decide if the action is likely to have a significant impact on the heritage values of the National Heritage Place. If the minister decides that the action is likely to have a significant impact, then the action requires approval under the EPBC Act (it is a controlled action). If the minister decides that the action is not likely to have a significant impact, then the action does not require approval under the EPBC Act (it is not a controlled action). A third category of decision allows the Minister to decide that an action is not likely to have a significant impact because it will be undertaken in a 'particular manner'. The Minister is required to make a decision within 20 business days of receiving a referral.

If the minister decides that an action requires approval, then an environmental assessment of the action must be carried out. If a Bilateral Agreement is in place with the State Government and Australia Government, the State Government can undertake the assessment using the accredited process under the Bilateral Agreement.

There are two Bilateral Agreements between the Commonwealth and South Australian Governments. The 'Assessment Bilateral Agreement', signed in 2014, allows the Commonwealth Minister for the Environment to rely on specified environmental impact assessment processes of South Australia in assessing actions under the EPBC Act. In August 2020, the Commonwealth of Australia gazetted a 'notice of intention to develop a draft approval bilateral agreement with South Australia'.⁶⁵

⁶³ DASH Architects 2018:43

⁶⁴ Department of the Environment 2013a:27-28

⁶⁵ Department of Climate Change, Energy, the Environment and Water 2022a

After considering the environmental assessment report, the Minister decides whether to approve the action and what conditions (if any) to impose.

10.0 National Heritage Impact Self-Assessment

This section provides an assessment of the proposed action against the SIG 1.1 Guidelines for the National Heritage Place.

10.1 Step 1: Proximity

Question 1: Are there any matters of National Heritage significance located in the area of the proposed works?

Note: The 'area of the proposed action' is broader than the immediate locality where the action is undertaken. Consider also whether there are any matters of National Heritage significance adjacent to or downstream from the immediate location that may potentially be impacted.

The Project Site and broader 'support zones' contains portions of land that fall inside the boundary of the National Heritage listed Adelaide Park Lands and City Layout'. A large portion of the Project Site accommodates the existing building compound of the South Australian Police (SAPOL) 'Thebarton Barracks' facility. This building compound is on land that has been excised from the National Heritage listing, but is bound to the east, north and west by National Heritage listed Park Lands.

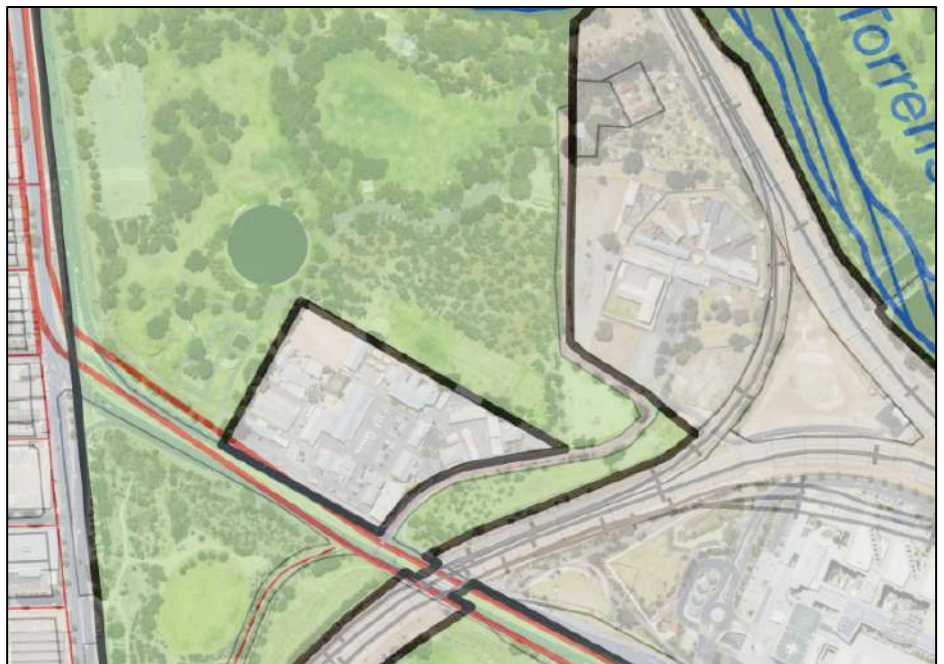


Figure 74 – Overlay of aerial image over boundary of National Heritage Place



Figure 75 – Overlay of proposed development and boundary of National Heritage Place



Figure 76 – Summary of portion of the Project Site that falls outside of the boundary of the National Heritage Place. Source: Base image URPS

Summary

Question 1: Are there any matters of National Heritage significance located in the area of the proposed works?

Answer 1: Yes

10.2 Step 2: Impact Assessment

Question 2: Considering the proposed new Women’s and Children’s Hospital at its broadest scope, is there potential impacts, including indirect impacts, to the National Heritage values of Adelaide Park Lands and City Layout?

Note: The proposed works should be considered at its broadest possible scope. This includes all stages and components of the works, all related activities, and all related infrastructure such as roads and powerlines, if applicable.

Consideration should be given to all adverse impacts that could reasonably be predicted to follow from the action, whether these impacts are within the control of the person proposing to take the action or not. Indirect impacts will be relevant where they are sufficiently close to the proposed action to be said to be a consequence of the action, and they can reasonably be imputed to be within the contemplation of the person proposing to take the action.

This Step 2 assessment identifies all potential direct and indirect impacts to the National Heritage values of the place arising from the project through a systematically against each of the heritage attributes identified in Section 5.3 and 5.4 of this report. These attributes have been grouped in the below assessment where they share common traits.

Step 2 does not evaluate the potential significance of these impacts, which is undertaken in Step 4 Significant of Impacts (Section 10.4).

10.2.1 Light’s 1837 Adelaide Plan

Summary of Attributes

- formal organisation, delineation and dedication of the Park Lands space
- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- defined inner and outer boundary
- legibility of encircling Park Lands
- publicly accessible open space
- six town squares
- streets in a grid pattern, hierarchy and width of streets

The section of Park Lands affected by this development has been subject to a wide range of historic uses and encroachments since the earliest days of colonial settlement. Its location along the historically important connection to Port Adelaide has likely been a significant contributing factor, and has resulted in large areas of land within this locality being excised from the boundaries of the National Heritage place, including a sizable portion of the project site area.



This historic pattern of development has resulted in an important and prominent section of the City's encircling Park Lands being largely bridged by built form and utilitarian encroachments. Despite the reversion of the nearby former SA Water Depot site back into landscaped Park Lands in 2011, the legibility of the encircling Park Lands in this location remains compromised.

10.2.1.1 Formal Organisation, Delineation and Dedication of the Park Lands Space

The extent to which the locating the new Women's and Children's Hospital within Park 27 (and surrounding excised land) is consistent with the formal organisation, delineation and dedication of the Park Lands space is vexed. "Hospital" facilities were identified in Light's 1837 plan as being located with the Park Lands. While their location has changed on several occasions, the Park Lands have accommodated large scale hospital facilities since the earliest days of the Colony.

The Women's and Children's hospital, however, has not historically been located within the Park Lands, but rather on a surveyed allotment fronting the Park Lands. Its relocation to Park 27 (and surrounding excised land) is inconsistent with its historic pattern of development.

Further, the 2008 National Heritage listing's emphasis on recreational (rather than utilitarian) uses is considered a turning point in balancing the impacts and appropriateness of any such additional encroachments.

For this reason, the location of the proposed new Women's and Children's Hospital within Park 27 (Tulya Wardli) (and surrounding excised land) is considered to have an impact on the formal organisation, delineation and dedication of the Park Lands space.

10.2.1.2 Physical expression of 1837 Plan and Legibility of Encircling Park Lands

Proposed Hospital Building

Most of the new hospital building is located on the land of the SAPOL building compound. The site primarily consists of a building compound comprising structures of between one and three storeys, surrounded by carparking / parade grounds and with very minimal landscaped character.

While the present SAPOL building compound is neither small nor low scale in the context of the perimeter Park Lands, it remains relatively visually discrete from most surrounding areas, with the exception of Port Road (through the Park Lands). This Port Road frontage has very poor amenity, with buildings set directly to the street edge with no landscaping and very little consideration to their Park Lands setting. This creates a sense that these areas form an extension to the urban form of the City. As a result, the legibility of the encircling Park Lands in this location is highly compromised. (Figure 77)



Figure 77 – Views of the SAPOL building compound are largely obscured from the east due to the elevated roadway over the rail lines.



Figure 78 – Views of the SAPOL building compound become more prominent in closer proximity along Port Road (through the Park Lands).

The proposed new hospital building will have several impacts on the legibility of the Park Lands in this location. The provision of a landscaped setback to the Port Road frontage will both significantly improve the visual and physical amenity of the locality, but also the immediate landscaped qualities (and legibility) of the encircling Park Lands along this important thoroughfare.

Conversely, the scale and height of the new hospital building (10 storeys) will be notably more prominent both within the immediate environs and from further away than the existing condition. The new building will encroach into the Park Land's skyline and diminish their open landscaped characteristics, and in turn broader legibility.

In addition to this, the footprint of the new hospital building also extends beyond the boundaries of the excised SAPOL land and into the National Heritage Place. Historic encroachments have seen large areas of the affected area being excised from the National listing, creating a vulnerable 'part-bridging' of encircling Park Lands in this location. While the total area of the encroachment is relatively minor (in the context of the scale of the overall Park Lands), the sensitivity of this location amplifies any potential impacts to the legibility of the encircling Park Lands.

Proposed Carpark / Central Energy Plant

The proposed carpark and central energy plant similarly extends this encroachment of built form over currently 'informal landscaped' sections of the National Heritage Place.

Like the hospital structure, the scale of these new buildings (and in particular the carpark at 7 storeys above ground) will be notably taller, larger and more visually prominent than existing structures in this locality, and will similarly impact on the legibility of the encircling Park Lands in this sensitive location.

Infrastructure Upgrades

The scope and detail of infrastructure upgrades associated with the project remain indicative only. Upgrades to Gaol Road will likely see it widened and 'formalised' with kerbs and footpaths. The alignment of Gaol Road appears to remain consistent with the existing, and is unlikely to impact on the legibility of Light's 1837 Plan.

Details of Stormwater and services upgrades are similarly indicative. Stormwater and services upgrades within the Park Lands are not uncommon, albeit the scale associated with this project likely are. Such upgrades will likely require significant excavations through the National Heritage place, but again this is not uncommon. Services upgrades to the west of the Project Site are indicated to be relandscaped and it appears reasonable to assume the same will occur for the new stormwater to the north. For these reasons the new stormwater and infrastructure upgrades associated with this project are unlikely to impact the legibility of Light's 1837 Plan or the encircling Park Lands.

The nature and extent of upgrades to Port Road also remain indicative, however information provided to date notes "Port Road widening to support new turn lanes, intersections, and intersection upgrades, construction of new shared use path bridges over railway and integration with existing footpaths..."⁶⁶

While these Port Road upgrades works will further increase the prominence and scale of this road corridor through the Park Lands, it is not considered to impact the legibility of Light's 1837 Plan nor the encircling Park Lands. The "Road from Port Adelaide" was identified in Light's original 1837 Plan and has remained an important transport corridor through the Park Lands since. As to be expected, Port Road has increased in size and capacity over time with the growth and modernisation of the City. This current upgrade continues this

⁶⁶ Woods Bagot New Women's and Children's Hospital WIP PLP: 19

pattern of development and as a result is not considered to adversely impact on the legibility of Light's 1837 Plan or the encircling Park Lands.

Temporary Works

Site fencing, building compounds and traffic control measures will impact selected areas of the 'Support Zone' surrounding the Project Site during the delivery of the project. Such impacts are, however, temporary and generally limited to areas that are either currently 'un-landscaped' (such as existing hard stand areas), or in locations that will go on to be redeveloped by the project. For these reasons this temporary work is not considered to adversely impact on the legibility of Light's 1837 Plan or the encircling Park Lands.

Details of the temporary alterations to existing roadways through Bonython Park remain indicative only, however it is understood that the existing roads (without kerbs and delineated with timber bollards, refer Figure 32) will remain in their present form. Projects details indicate that some selected trees along this roadway may need to be removed to accommodate larger vehicles. Notwithstanding this, the general legibility of Light's 1837 Plan or the encircling Park Lands are unlikely to be impacted by these limited works.

10.2.1.3 Public Accessible Open Space

The vast majority of the Project Site is presently inaccessible to the public. The historic introduction of the rail lines within the locality largely segregated the affected area from surrounding Park Lands. This, coupled with other historic encroachments, limited publicly accessible areas, the expansion of Port Road and the tramway extension has resulted in large areas (if not all) of the locality around the Project Site being difficult, or unappealing to publicly access.

The proposed development will redress many of these current deficiencies by:

- Significantly improving public connections and accessibility to and through this portion of the Park Lands
- Reverting back large areas of Park Lands back into publicly accessible spaces (for example Kate Cocks and land surrounding the historic gaol)
- Undertaking landscaping upgrades that promote and encourage public access to the affected areas (with new playground and community spaces to the north of the Hospital).

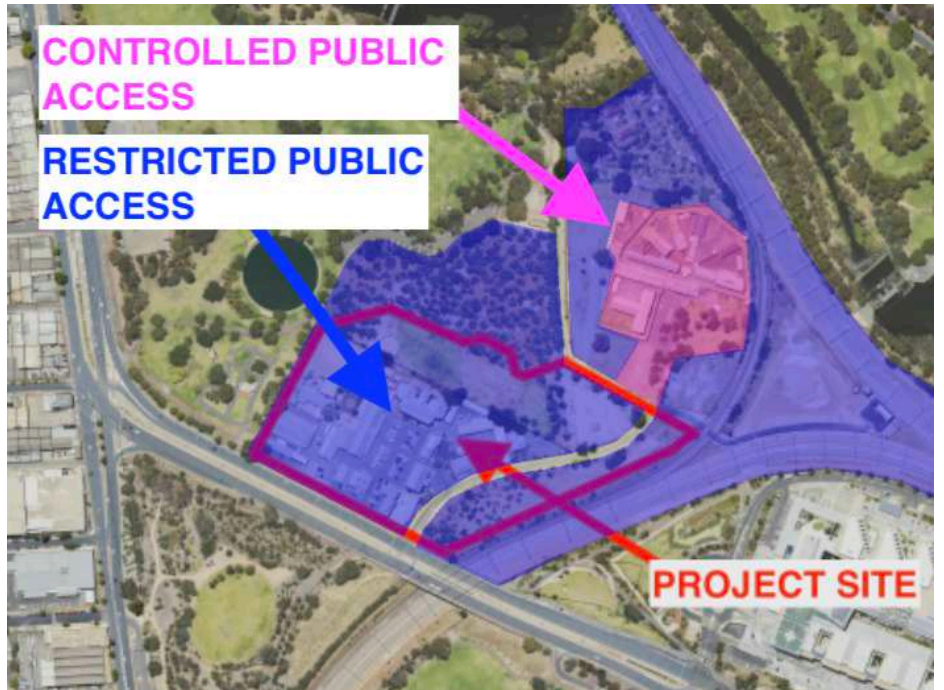


Figure 79 – Aerial image showing current extent of public accessibility with the affected area (indicative)

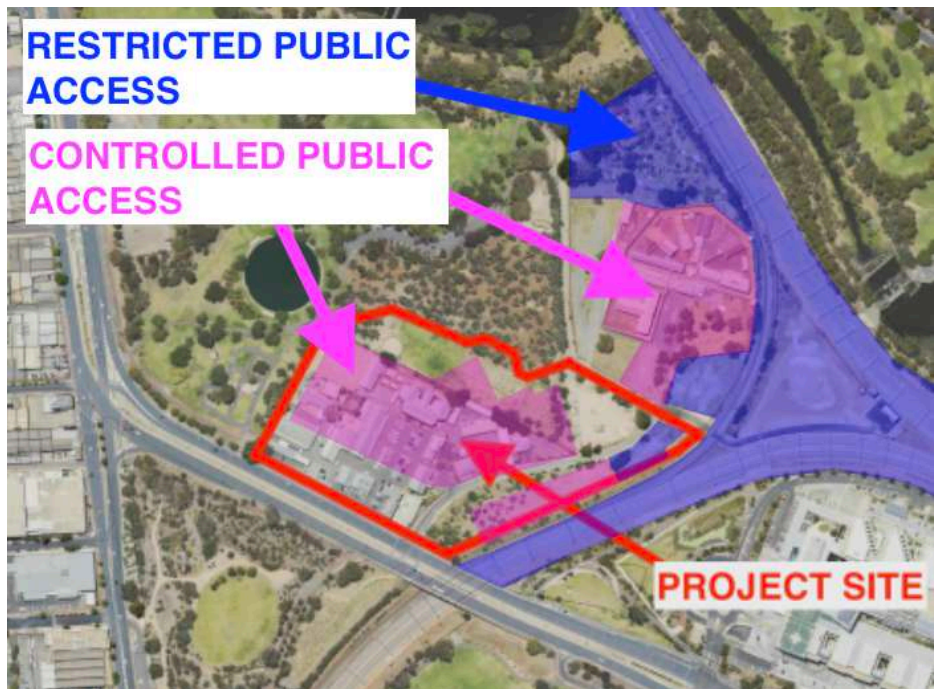


Figure 80 – Aerial image showing proposed extent of public accessibility with affected area (indicative)

10.2.1.4 Town Squares and City Grid Pattern

The proposed works are not considered to impact on the legibility of the town squares or City Grid Layout.

While the works do increase the prominence and scale of Port Road through the Park Lands, such increases are relatively marginal. Further, while the “Road from Port Adelaide” was identified on Light’s 1837 Plan, it does not form part of the formal City Grid layout. For these reasons this attribute is considered to remain unaffected by the proposed project.

10.2.2 Use

Summary of Attributes
<ul style="list-style-type: none">• diverse use of the place for recreation, sports, events and meeting spaces• range of important civic, public, and cultural assets and institutions within the Park Lands

The Park Lands served several purposes during the City’s early years. Given the challenges faced during the initial years of colonial settlement many of these initial uses were very utilitarian in nature. The Park Lands also served a commercial purpose by containing the economic value of the surveyed acre allotments from nearby speculative land sales. Light’s 1837 Plan of Adelaide clearly showed a range of Government uses within the Park Lands, including Government House, a hospital, Barracks, a school, market, store and a cemetery. These facilities were probably located in the Park Lands as they needed to go somewhere, and it was likely undesirable to locate such functions on saleable land.

Early Government encroachments rapidly expanded to include a gaol, an armoury, a railway station, parliament, botanic gardens, the zoological gardens, exhibition grounds, parade grounds, a destitute enclosure and an asylum, to name just some. Institutional encroachments were also located within the land allocated by Light as Park Lands, including an Institute Building / Public Library, Museums, Universities, and additional schools.

The landscape and recreational values of the Park Lands were being recognised as early as the 1850s, when the first City Gardener was appointed. 1869 saw the establishment of the first community group opposed to the ongoing alienation of the Park Lands: the Park Lands Defence Association. This phase marked a clearly identifiable evolution in community attitudes towards, and the cultural importance of, the Adelaide Park Lands that has continued since.

Reconciling the tensions between the ‘utilitarian’ and ‘recreational’ uses of the Park Lands is challenging. Importantly, while the National listing recognises the significance of historic “public institutional domain” encroachments, many of these are now located on land excised from the boundary of the National

Heritage Place due to their impact on, and alienation of, the Park Lands within which they were located. This is the case for the SAPOL building compound, the Adelaide Gaol, and rail corridors adjacent the Project Site.

While existing historic cultural assets and institutions are recognised by the National Heritage listing, its clear the National Listing places great emphasis on the 'recreational' characteristics of the place.

The majority of the Project Site consists of land occupied by the SAPOL. The SAPOL building compound is a historic encroachment, having been established in 1917. This land has been excised from the National Heritage listing and therefore any impacts to the use of the Park Lands from development on this land is limited to those on interfacing areas (that fall within the boundaries of National Heritage Place).

The current SAPOL horse training facilities and agistments fall within the boundaries of the National Heritage Place. While these areas have no public access, their existing uses nonetheless remain consistent with the heritage values of the Park Lands. The proposed use of these areas is affected in several ways by the proposed development:

Northern Olive Grove (Kate Cocks Park)

The horse training facilities and agistments to the north of the new hospital building (Kate Cocks Park) will be mostly reverted back to publicly accessible land, and include a "family hub" that is understood to include accessible play facilities. The historic olive grove will be retained and land previously cleared for the training facilities re-landscaped. This reintroduction of public access will enable the land to be used for passive recreational purposes. This new use is consistent with the National Heritage values of the Park Lands.

A small portion of Kate Cocks Park will also be encroached upon by the new hospital building. This change in use from an agistment to an institutional building is inconsistent with the National Heritage values of the Park Lands.

Eastern Agistment

The land to the east of Gaol Road is currently an 'unused agistment' for the adjacent SAPOL, and contains an under-maintained landscape that includes remnant olive trees from the adjacent grove. Like the northern agistment public access has been excluded from this land. Similarly, the use as an agistment (albeit unused) is also consistent with the National Heritage values of the Park Lands.

There are several proposed change in uses for this eastern agistment:

- **Multideck Carparking Station:** The proposed multideck carpark is necessary to support the new hospital. Carparking within the Park Lands is not uncommon, and often necessary to support their use and activation. Most such carparking is, however, open, low scale and uncovered such as that which supports the adjacent Bonython Park. Carparking is *generally* discrete and supplementary to the existing Park Lands use (to varying degrees of success). While the proposed multistorey carpark is provided to support the proposed hospital use, it is neither open, low scale uncovered or discrete.

- The central energy plant: this facility is needed to support the proposed hospital, and will reduce any proposed reintroduction of public access to this land. While services infrastructure itself is not necessarily inconsistent with the National Heritage values of the Park Lands, such infrastructure is typically associated with compatible land uses (such as the Torrens Weir, council maintenance facilities, kiosk waste areas, stormwater management).
- New publicly accessible landscaped areas: the relandscaping and re-introduction of public uses to the eastern agistment is consistent with the National Heritage values of the Park Lands, and desirable. The upgrade to pedestrian and cycle connections will further improve the public recreational use of both the affected and surrounding land.

In summary, the relandscaping, reintroduction of public access, and improved pedestrian and cycle connections within the eastern agistment are consistent with the National Heritage values of the Park Lands (and desirable). The proposed multistorey carpark and central energy plant, however, are generally inconsistent.

Northern Hard Stand

The gravel hard stand located to the north of the SAPOL is presently fenced off from public access and used for a range of utilitarian purposes by (as we understand it) the Adelaide City Council. Until recently it was used for storage of trailers and equipment, but is currently vacant. The northern hard stand area will become the loading bay for the new hospital building. While there is presently no public access or recreational use of this land, the proposed new loading bay, like the hospital building itself, will limit any future options for this land to be remediated.

Adelaide Gaol Hard Stand

The proposed works also includes the relandscaping and reintroduction of public access to the hard stand areas to the west of the Adelaide Gaol. This land is not within the boundaries of the National Heritage place but it does support the increased recreational use of surrounding land that is. For this reason this change in use is considered to be consistent with the National Heritage values of the Park Lands.

Infrastructure Upgrades

While details of the infrastructure upgrades remain indicative, they will likely have no impact on the use of the Park Lands.

Temporary Works

Much of the land affected by temporary works is presently inaccessible to the public and therefore will have minimal impacts to the use of the Park Lands. Impacts to areas that are publicly accessible include:

- The location of some 'satellite' site amenities to the southern side of Port Road,
- The provision of temporary site fencing to the southern side of Port Road and within sections of Bonython Park.

These facilities and temporary fencing will impact on the use of these sections

of the Park Lands during the delivery of the project.



Figure 81 – Temporary works plans [Source: new WCH Project]

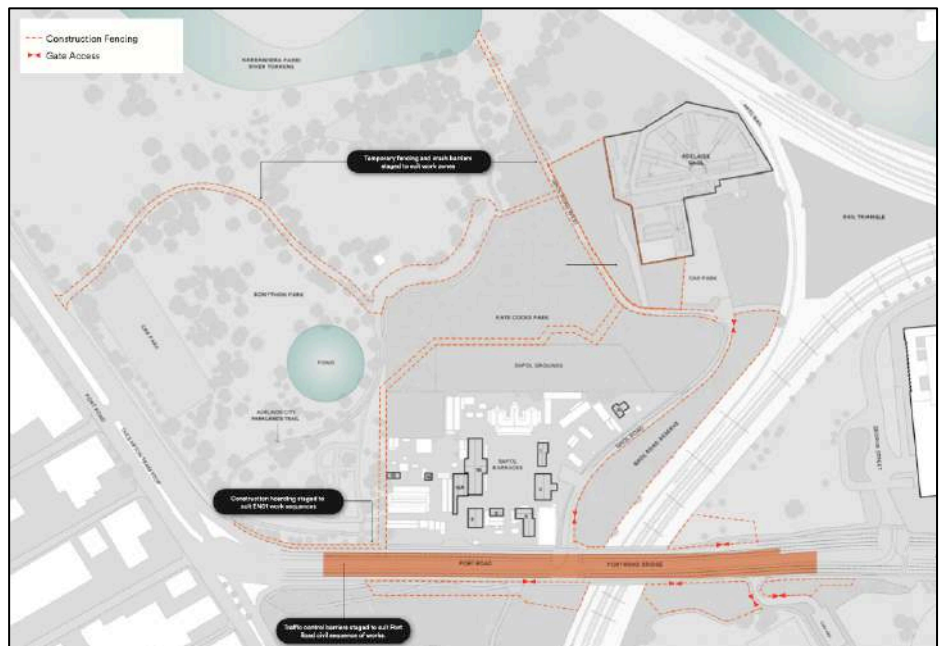


Figure 82 – Temporary works plans [Source: new WCH Project]

10.2.3 Landscape Character

Summary of Attributes
<ul style="list-style-type: none">diverse landscape character including formal designed plantings, gardens and areas, informal landscapes and open bushland.

Whilst the Adelaide Park Lands and City Layout are a single heritage place, it's landscape character varies greatly from area to area. This diverse landscape character is a recognised attribute of the National Heritage listing. This diverse landscape character is born from the Park Lands evolving and changing use and cultural values. The early years of the Colony saw most native vegetation removed, with the southern Park Lands being used for grazing, fire wood collection and agistment.

It wasn't long, however, before the landscape values of the Park Lands were being recognised, with the first City Gardener being appointed in the 1850s. The use and landscape character of the Park Lands has evolved ever since, and include areas of formal and semi-formal gardens, sporting fields (hard and turf surfaces) and open bushland.

Buildings within the Park Lands are also relatively common, and can be loosely categorised as:

- Historic encroachments: depending on their era these buildings were often placed solely as needed with little specific regard to the cultural and social values of the Park Lands (such as the SAPOL and nearby Adelaide Gaol)
- More recent structures: that *generally* are located and designed to support the ongoing use and maintenance of the Park Lands (such as sporting facilities, maintenance facilities, kiosks, amenities).

Historic encroachments display themes associated with the early utilitarian use of the Park Lands during a time when the social and cultural values of the place were perhaps less significant than they are today.

Many of the later structures can often be considered 'buildings in a park'. Ideally, their scale, siting and design responds to their Park Lands setting, and maintain the general 'open' landscape character of the Park Lands that stand in contrast to the built up areas of the City and surrounding suburbs. This has, however, been achieved to varying degrees of success.

This diverse and evolving landscaped character, including buildings and structures therein, is intrinsic to the National Heritage values of the Adelaide Park Lands.

This landscape character can also be considered in two contexts:

- Localised Context: The landscaped character within the local context such as that observed by a person travelling through or using the space, and
- Broader Context: the landscaped character of the Park Lands when observed from afar. This could be from other areas of the Park Lands, the City or surrounding suburbs, or even when flying over or from Mt Lofty.

Both of these landscaped contexts will be considered by this assessment.

SAPOL Building Compound

This land falls outside of the boundaries of the National Heritage place. The site primarily consists of a building compound comprising structures of between one and three storeys, surrounded by carparking / parade grounds. They display historic themes associated with early Government encroachments during an era when perhaps the social and cultural values of the Park Lands were considered to be less significant than they are today. These historic encroachments form part of the diverse landscape character of the Park Lands.

Given the SAPOL building compound falls outside of the boundary of the National Heritage place, its removal should not be considered to impact the landscaped character of the Adelaide Park Lands.

Despite the land fallout outside of the boundaries of the National Heritage place, the reintroduction of a planted landscaping within the SAPOL building compound site, particularly to the interface of Port Road, will have a positive impact on the landscaped qualities (and legibility) of the Adelaide Park Lands along this important and well traversed thoroughfare (ie within the localised context).

As noted above, 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.

While large buildings have encroached into the Park Lands previously, they are either located outside of the portion of Park Lands that encircle the City, and/or are associated with existing historic culturally important land uses (such as Adelaide Oval).

In this instance, 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. This scale and location of built form will adversely impact on the “open” landscape characteristics of the Adelaide Park Lands within the broader context.

Northern Olive Grove (Kate Cocks Park)

The retention of large areas of the historic olive grove, and relandscaping of horse training facilities is consistent with the National Heritage values of the Park Lands both within the localised and broader context. A small section of the olive grove, and the open horse training facility will be impacted by the proposed the new hospital building.

Eastern Agistment

The relandscaping of the 'under-maintained' eastern agistment will remain consistent with the landscaped character of the Adelaide Park Lands in the localised context.

Like the new hospital building, however, the new carpark station (7 storeys above ground) and central energy plant (2 storeys) will notably impact not only on the landscape character of the former agistment, but also the "open" landscape characteristics of the Adelaide Park Lands in the broader context of this locality.

Northern Hard Stand

The northern hard stand area will be utilised as the loading bay for the new hospital. It will receive some additional landscaping to its edge to screen this area. Like the hospital building itself, the loading bay will encroach into an area of National Heritage listed Park Lands. This encroachment is over land of minimal current landscaped character. The proposed new loading area in this portion of the Park Lands will, however, remove the potential for its future landscaping rehabilitation.

Adelaide Gaol Hard Stand

While the hard stand to the west of the Adelaide Gaol falls outside of the boundary of the National Heritage place, its proposed re-planting will significantly improve the landscape qualities of surrounding Park Lands.

Infrastructure Upgrades

While details of the services infrastructure upgrades remain indicative, they will likely have no impact on the landscape qualities of the Park Lands due to their relandscaping after installation.

While some aspect of the Port Road upgrades will alter the landscaping along this corridor, such changes remain consistent with this historic roadway through the Adelaide Park Lands.

Temporary Works

Like the infrastructure upgrades, temporary works will likely have no impact on the landscape qualities of the Park Lands due to their relandscaping after installation.

10.2.4 Associations

Summary of Attributes

- longevity of conservation and protection of Park Lands
- association with community groups that campaign for its protection and accessibility
- association with Colonel William Light.

These attributes are not considered to be affected by the proposed works.

Summary

Question 2: Considering the proposed new Women's and Children's Hospital at its broadest scope, is there potential impacts, including indirect impacts, to the National Heritage values of Adelaide Park Lands and City Layout?

Answer 2: Yes

10.3 Step 3 Mitigation

Question 3: Are there any proposed measures to avoid or reduce impacts of the proposed new Women's and Children's Hospital on the National Heritage values of the Adelaide Park Lands and City Layout?

Note: You should consider impacts on matters of National Heritage significance in relation to the following:

- site selection and the location of buildings or activities on the selected site
- the timing of the action or its component activities, and
- the design of any buildings, or other structures or infrastructure.

The following mitigation measures have been implemented to avoid or reduce potential impacts to the National Heritage values of the Adelaide Park Lands and City Layout.

10.3.1 Site Selection

As would be expected for a specialist facility of this nature, the site selection criteria for the proposed new Women's and Children's Hospital considered a range of clinical, financial, project delivery and site condition factors. 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.

10.3.2 Specialist Advice

DASH Architects, the authors of this NHIA and specialists in the National Heritage values of the Adelaide Park Lands and City Layout, was engaged during part way through the design phase of the project to assist the consulting team to better understand the National Heritage values of the Adelaide Park Lands and their attributes of heritage value. This advice extended to the provision of design guidelines to assist in mitigating potential adverse heritage impacts. These guidelines included:

Siting:	The new infrastructure should be sited to maintain the clear delineation of the encircling Park Lands.
Setout:	Visual definition of the inner and outer edges of the Park Lands, and creates a contrast between the City Layout and the Park Lands
Visual Impact:	Any new infrastructure should 'nestle' into the Park Lands setting and be visually discrete.
Physical Impact:	Any development should seek to minimise the physical impacts on the Park Lands
Use:	Impacts to the recreational use of the Park Lands should be minimised.
Accessibility:	The development should maximise community access and use.

While many aspects of the 'project fundamentals' were established prior to the provision of this advice, it was likely influential in amending and developing the proposed façade treatment to the proposed carpark structure.

10.3.3 Design Measures

The following design measures appear to have been integrated to mitigate potential National Heritage impacts to the Adelaide Park Lands:

Landscape Buffer to Port Road

A 50m landscape buffer is being provided to the Port Road interface of the new Hospital building. The present SAPOL building compound is located directly off Port Road, with no landscaping, resulting in not only an unwelcoming and inhospitable pedestrian environment, but also a reduction in the legibility of the encircling Park Lands and their landscape qualities in this location.

The proposed 50m landscaped buffer in this location will improve the pedestrian amenity and landscape qualities within this location, and in turn the Park Lands setting of the project. It will also improve the legibility of the Park Lands belt along this important Port Road interface.



Figure 83 – Proposed landscaped buffer to Port Road interface with site [Source: new WCH Project]

Setout and Articulation of Hospital Building

The hospital building has been set out and designed to respond to the locality and promote public access to an area of Park Lands that has been unwelcoming and difficult to access. The curved form to the Gaol Road intersection provides sightlines into the precinct and softens the visual presentation of the building from the important City approach.

Despite having an overall height of 10 storeys, the building has a visual bulk and scale dominated by the 6 storey podium. The upper storeys are setback and articulated to reduce their visual prominence.



Figure 84 – Indicative render of building with a visually dominant 6 storey podium and set back and articulated upper storeys [Source: new WCH Project]

Carpark façade and Setback

The new 7 storey (above ground) carpark is setback from Port Road approximately 25m and includes a landscaped buffer to this edge which assist in maintaining some legibility of the Park Lands along this interface. The eastern and southern façades of the building will be screened at a lower level

with landscaping, which will be promoted to grow up the facades at select locations. The design intent for this approach is to visually soften the expanse of façade (particularly the eastern façade) and provide a more compatible visual expression within the Park Lands setting.



Figure 85 – Indicative render of proposed carpark [Source: new WCH Project]



Figure 86 – Indicative render of proposed carpark [Source: new WCH Project]

Improvement of Pedestrian / Cycle connections

The Project Site and the surrounding environs is presently unwelcoming and difficult to access by the public. Public realm upgrades around and through the affected areas will significantly redress these shortfalls.

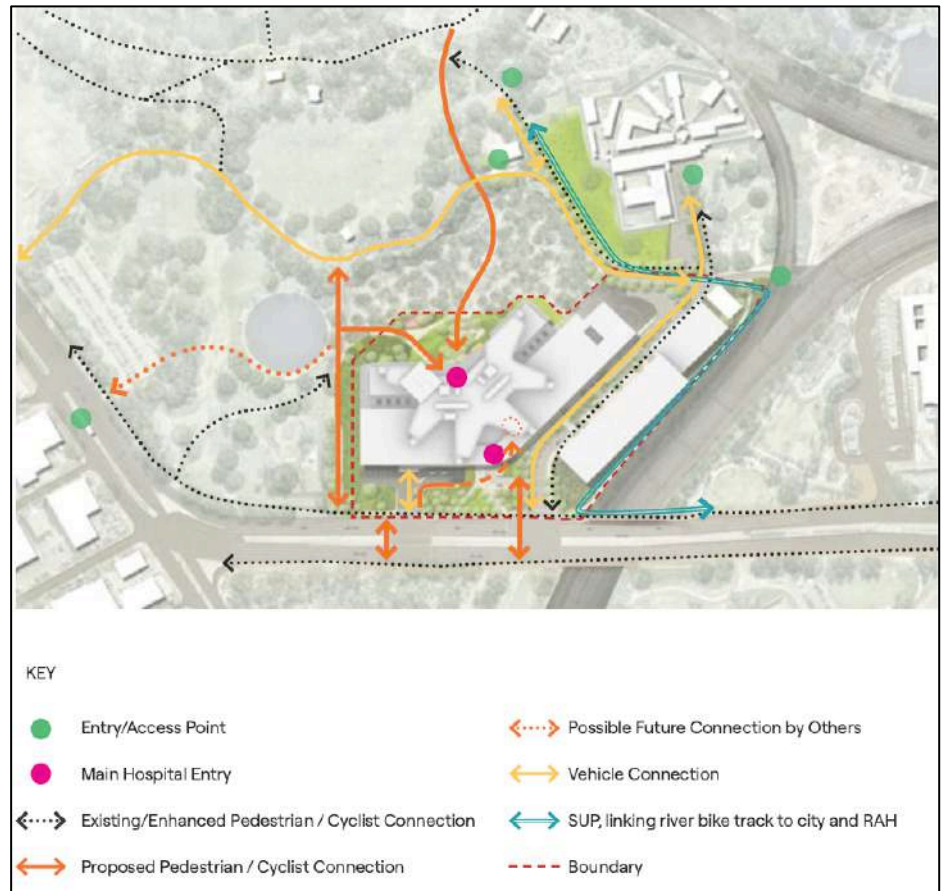


Figure 87 – Proposed upgrades to pedestrian and vehicular circulations around and through the site [Source: new WCH Project]

Increased Public Access and improved amenity to Park Lands

The proposal restores public access to 24,000m² of Park Lands at Kate Cocks Park, and approx. 11,100sqm of land excised from the National Heritage listing adjacent the Adelaide Gaol. These areas will form part of the accessible recreational facilities for families associated with the new facility, enhancing recovery and wellbeing and improving the Park Lands setting.

Port Road Upgrades

Port Road upgrades within the vicinity of the Project Site will include a right turn from the City approach, a feature currently lacking with the existing intersection. This lack of right turn makes vehicular access from the City into Gaol Road highly problematic, and significantly disincentivise access to the historic Adelaide Gaol, and this portion of the affected area generally.

This upgrade will significantly improve public access to this portion of Adelaide Park Lands.

Re-Landscaping

With the exception of Kate Cocks Park (the historic olive grove) being used as SAPOL agistment, the project site area has generally poor and unmaintained landscapes. The proposed works will seek to redress this with extensive additional landscaping, including the provision of the noted landscape buffer to

Port Road, upgraded landscaping along Gaol Road, and the relandscaping of approx. 11,100sqm of land around the Adelaide Gaol. Additional landscaping is also proposed around all new buildings.



Figure 88 – Indicative proposed landscaping [Source: new WCH Project]

10.3.4 Additional Mitigation Recommendations

The following additional mitigation strategies have been recommended to further reduce identified impacts of the project on the National Heritage values of the Adelaide Park Lands and City Lay. It is understood that the Project Team has now committed to these strategies.

1. 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.

2. 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.

3. Landscape screening

Landscape design and plant selections used for screening buildings should be mature selections, and suitable for their intended use and location.

4. Temporary works to roadway in Bonython Park

Existing roadways through Bonython Park used to provide temporary access should maintain their current general configuration (free of kerbs, defined by timber bollards). Any tree removal should be kept to a minimum and not impact the overall landscape qualities of the affected areas of Park Land.

5. Port Road design

Further design development of the proposed Port Road upgrades should provide high levels of pedestrian amenity. Any perimeter landscaping removed to facilitate widening should be replanted to maintain the Park Lands setting of the thoroughfare.

6. Landscape remediation following construction

All areas of Park Lands affected by temporary works are to have their landscaping remediated upon completion of the project to ensure the landscape qualities of the Park Lands are maintained.

7. 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.

Summary

Question 3: Are there any proposed measures to avoid or reduce impacts of the proposed new Women's and Children's Hospital on the National Heritage values of the Adelaide Park Lands and City Layout?

Answer 3: Yes

10.4 Step 4: Significance of Impacts

Question 4: Are any impacts of the new Women's and Children's Hospital to the National Heritage listing of the Adelaide Park Lands and City Layout likely to be significant impacts?

Note: In order to decide whether an action is likely to have a significant impact, it is necessary to take into account the nature and magnitude of potential impacts. In determining the nature and magnitude of an action's impacts, it is important to consider matters such as:

- the sensitivity of the environment which will be impacted
- the timing, duration and frequency of the action and its impacts
- all on-site and off-site impacts
- all direct and indirect impacts
- the total impact which can be attributed to the action over the entire geographic area affected, and over time
- existing levels of impact from other sources, and
- the degree of confidence with which the impacts of the action are known and understood.

A 'significant impact' is an impact which is important, notable or of consequence, having regard to their context or intensity.

The SIG 1.1 Guidelines provide a guidance for assessing whether an impact is considered 'Significant'. Its definitions state:

What is a significant impact?

A 'significant impact' is an impact which is important, notable, or of consequence, having regard to its context or intensity. Whether or not an action is likely to have a significant impact depends upon the sensitivity, value, and quality of the environment which is impacted, and upon the intensity, duration, magnitude and geographic extent of the impacts. You should consider all of these factors when determining whether an action is likely to have a significant impact on matters of national environmental significance.

For National Heritage places it goes on to note:

Significant impact criteria

An action is likely to have a significant impact on the National Heritage values of a National Heritage place if there is a real chance or possibility that it will cause:

- one or more of the National Heritage values to be lost
- one or more of the National Heritage values to be degraded or damaged, or
- one or more of the National Heritage values to be notably altered, modified, obscured or diminished

The guidelines go on to note:

National Heritage places with cultural heritage values

An action is likely to have a significant impact on historic heritage values of a National Heritage place if there is a real chance or possibility that the action will:

- permanently remove, destroy, damage or substantially alter the fabric of a National Heritage place in a manner which is inconsistent with relevant values
- extend, renovate, refurbish or substantially alter a National Heritage place in a manner which is inconsistent with relevant values
- permanently remove, destroy, damage or substantially disturb archaeological deposits or artefacts in a National Heritage place
- involve activities in a National Heritage place with substantial and/or long-term impacts on its values
- involve the construction of buildings or other structures within, adjacent to, or within important sight lines of, a National Heritage place which are inconsistent with relevant values, and
- make notable changes to the layout, spaces, form or species composition of a garden, landscape or setting of a National Heritage place in a manner which is inconsistent with relevant values.
- restrict or inhibit the continuing use of a National Heritage place as a cultural or ceremonial site causing its values to notably diminish over time
- permanently diminish the cultural value of a National Heritage place for a community or group to which its National Heritage values relate
- destroy or damage cultural or ceremonial, artefacts, features, or objects in a National Heritage place, and
- notably diminish the value of a National Heritage place in demonstrating creative or technical achievement

These above guidelines assist to understand the threshold for when an impact becomes a significant impact. Common attributes include “**notable**”, “**substantial**”, and “**important**”.

10.4.1 Light's 1837 Adelaide Plan

Summary of Impacted Attributes

- physical expression, integrity, legibility and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography
- formal organisation, delineation and dedication of the Park Lands space
- defined inner and outer boundary
- legibility of encircling Park Lands

Physical expression of Light's 1837 Adelaide Plan / Legibility of encircling Park Lands / Definition of the inner and outer park lands boundary

The affected area of the proposed development has been subject to significant historic encroachments since the surveying of the City itself. Its proximity to the important Port Road connection is likely a significant contributing factor. These encroachments include the existing 2 to 3 storey SAPOL Thebarton Barracks facility, built within very close proximity to Port Road (through the Park Lands). This site, along with other historic encroachments such as the Adelaide Gaol and rail corridor, have diminished the legibility of the Park Lands in this locality to such an extent that large areas of Light's original Park Lands along Port Road have been excised from the boundary of the National Heritage place.

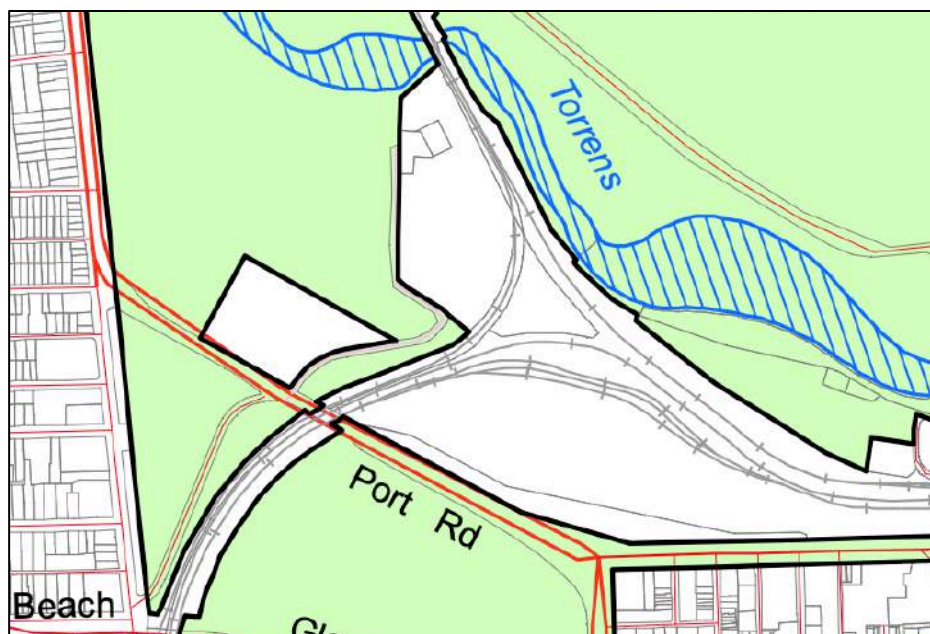


Figure 89 – Part National Heritage Place boundary, showing large areas of Light's original Park Lands excluded from the National Heritage listing along Port Road due to historic encroachments [Source: DCCEEW 2022a]

Mitigation measures incorporated by this project do address several of the existing and potential impacts on the legibility of the Park Lands in this locality. In particular the 50m setback of the new buildings from Port Road (through the Park Lands) and inclusion of landscaped buffers improves the legibility of the Park Lands belt along this important thoroughfare when compared to the existing condition.

While the land of the proposed new carpark structure is generally of low integrity and largely disconnected from its surrounds by historic encroachments, it nonetheless provides some legibility to the original extent of the encircling Park Lands. Notably, this land remains within the boundary of the National Heritage place. Development of this land with a new carpark, 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.

The legibility of the encircling Park Lands is defined by the contrast of development along its inner and outer edge to the open landscape characteristics within. Historic encroachments have already diluted the legibility of the encircling Park Lands in this locality. Their redevelopment with larger, taller and additional structures has the potential to further compromise this legibility within the immediate and broader locality.

For these reasons the project has the potential to result in a significant impact on the legibility of the encircling Park Lands and Light's 1837 Adelaide Plan.

Formal organisation, delineation and dedication of the Park Lands space

Historically, Government and Institutional encroachments into the Park Lands have been primarily concentrated along the northern side of North Terrace, where land had been designated early in the City's history as a Government Reserve. These encroachments have resulted in large areas of Light's original Park Lands being alienated and ultimately excluded from the National Heritage listing of the Adelaide Park Lands and City Layout in 2008 (Figure 46).

Government and institutional encroachments within other areas of the Park Lands have generally been limited, but include West Terrace Cemetery and Adelaide High School. Other notable encroachments have generally been of a recreational or civic use, while minor encroachments have been limited to facilities that support the ongoing maintenance of the Park Lands or support their recreational use.

This pattern of historic development has defined the 'organisation and delineation' of the Park Lands.

While historic Government encroachments 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 prioritised.

Notwithstanding this, the locality of the proposed development has been subject to more historic utilitarian and Government encroachments than most other areas of the encircling Park Lands. As noted, its proximity along the historically important connection to Port Adelaide is likely a significant contributing factor.

The proposed new Women's and Children's Hospital will largely be located on land presently used by the SAPOL for their operations. While the Women's and Children's Hospital has not historically been located within the Park Lands, it has had a direct spatial relationship with them. Further, the Park Lands has historically accommodated a wide range of 'hospital' uses, including the "Emigrant Location", women's destitute asylum, 'Native location', Adelaide Lunatic Asylum, and the Royal Adelaide Hospital.

Given this, the historic pattern of encroachments to the affected area, and the displacement of an existing Government use, the proposed siting of the new Women's and Children's Hospital in Park 27 (Tulya Wardli) (and surrounding excised land) is unlikely to result in notably or substantially alter the formal organisation, delineation and dedication of the Park Lands space.

While the project will likely have some impacts on the formal organisation, delineation and dedication of the Park Lands space, such impacts are unlikely to be "significant".
--

10.4.2 Use

Summary of Attributes
<ul style="list-style-type: none">• diverse use of the place for recreation, sports, events and meeting spaces• range of important civic, public, and cultural assets and institutions within the Park Lands

While the majority of the Hospital building is located within the land of the existing SAPOL building compound, a sizable portion nonetheless extends outside of this area and into the adjacent northern hard stand areas and into boundary of the National Heritage listed Park Lands. While this land is presently underutilised, and restricted from public access, it remains "Park Lands" and retains the potential to be relandscaped and used for passive or active recreational purposes. The proposed extension of the hospital loading bay into this land will limit any such future opportunities.

Likewise, while the eastern agistment is presently under-maintained and has restricted public access, it too also remains "Park Lands" with the potential to be rejuvenated for passive or recreational use. While the proposed works to this area includes the provision of a cycleway (as a highly desirable extension to the existing Park Lands loop), the new carpark and central energy plant structure will similarly limit any substantial future recreational remediation of this land.

While such impacts have the potential to be significant to the affected areas, they will likely have a lesser impact on the overall use of the Park Lands generally. Historic encroachments, existing Government uses, and parcels of excised land from the National Heritage listing has resulted in a portion of Park Lands that is difficult to access and ultimately use for recreational purposes. Realistically, the affected areas of Park Lands will always be small parcels of land connecting adjacent land uses. This is the outcome ultimately achieved by the proposed works.

The use of temporary fencing across sections of Park 27 (Tulya Wardli) will impact the general accessibility to several area sections of surrounding Park Lands. This is similarly the case for the proposed Port Road works. While this fencing, and the temporary amenities, will have some impact on the use of the affected and surrounding spaces, such impacts will be temporary only. It is not uncommon for areas of the Park Lands to be restricted or closed to access during works, and such impacts are generally of a minor and short term nature only. While these temporary works will likely last several years, they nonetheless still considered to be short term only, and will not result in permanent or substantial long term impacts.

So while the project will likely have some impacts on the use of the affected Park Lands space, such impacts are unlikely to be “significant” in the context of the broader National Heritage place.

10.4.3 Landscape Character

Summary of Attributes
<ul style="list-style-type: none">• diverse landscape character including formal designed plantings, gardens and areas, informal landscapes and open bushland.

As noted, the landscape character can also be considered in two contexts:

- Localised Context: The landscaped character within the local context such as that observed by a person travelling through or using the space, and
- Broader Context: the landscaped character of the Park Lands when observed from afar. This could be from other areas of the Park Lands, the City or surrounding suburbs, or even when flying over or from Mt Lofty.

The contrasting open character of the Adelaide Park Lands differentiate them from the built edges of the City and surrounding suburbs. This ‘openness’ is intrinsic to their landscape character within the broader context.

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.

With the exception of Kate Cocks park (historic olive grove) and to a lesser extent the eastern agistment, the landscape character of the area affected by the proposed development could best be described as generally poor,

inaccessible, under-maintained and un-landscaped. This does not, however, preclude their potential relandscaping in a manner more consistent with the National Heritage values of the place.

While the project will result in large areas of the affected land being landscaped in a manner that is both desirable and consistent with the National Heritage values, the some impacts to the landscape character of the Park Lands will still arise:

Loss of existing landscaping

The proposed new carpark and central energy plant will see this landscape removed and replaced by large buildings. While some of these losses will be mitigated by proposed new planting, there will still be a net loss of landscaped National Heritage listed Park Lands. Despite this, the impacts arising from the net loss of landscaped areas within the Park Lands is unlikely to be “significant” within the localised context as:

- Buildings within the Park Lands contribute towards the landscape character of the place and will regularly result in a loss of area available for landscaping.
- The landscape of the Park Lands is continually evolving, and net losses and gains to landscaped areas are to be expected.

As noted under Section 9.3 Cumulative Impacts, it is important to monitor landscaping trends within the Park Lands to ensure that collective minor losses or gains do not result in significant impacts to the National Heritage values of the place. This issue of potential Cumulative Impacts was identified in the 2020 Independent Review of the EPBC Act, that went on to recommend amendments to the legislation to accommodate such considerations. At present, however, any such impacts need to be considered on a project-by-project basis.

For these reasons the loss of landscaped area within the eastern agistment arising from the construction of the proposed carpark and central energy plant is unlikely to result in a “significant” impact to the landscaped character of the Park Lands within the localised or broader context.

Visual Impact of new structures

While the existing buildings within the SAPOL compound are neither small nor low in the context of the perimeter Park Lands, they remain relatively visually discrete within the broader Park Lands context. Further, they display historic themes associated with the early utilitarian use of the Park Lands during a time when the social and cultural values of the place were perhaps less significant than they are today. These historic themes or early encroachments form part of the diverse landscape character of the Park Lands.

While the land of the SAPOL Building Compound falls outside of the boundary of the listing, it remains encircled by the National Heritage listed Park Lands.

While the demolition of the SAPOL buildings is unlikely to impact the landscape character of the Park Lands (due to its limited landscape qualities and the site falling outside of the listed boundary), their replacement with a new 10 storey hospital building likely will. The new hospital building will be a substantially large new building located relatedly within the encircling Park Lands belt. It will be visible from a significantly greater area than the existing SAPOL facilities, and has the potential to impact on the 'open' landscape character of the surrounding Park Lands within the Broader Context

Despite being located on land excised from the National Heritage listing, and integrating design mitigation measures to reduce its visual bulk and scale, including increase landscaping in key locations, the proposed new hospital will be an atypically large and prominent new feature located with the encircling Park Lands. It has the potential to reduce the sense of 'openness' and be generally inconsistent with the landscape character of the National Heritage place within the broader context.

All of these issues equally apply to the proposed new carpark, except in this instance the new building is located within the boundaries of the National Heritage Place. Its size, siting and orientation to the Port Road thoroughfare out of the City will result in the building retaining a very high visual prominence, despite proposed façade design measures that go some way to mitigating such impacts. Like the hospital building, the new carpark structure is located centrally within the Park Lands belt and has the potential to reduce the sense of 'openness' associated with the landscape character of identified National Heritage importance within the broader context.

For these reasons 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.

10.4.4 Summary

This Heritage Impact Assessment has concluded that while the project may result in impacts to 7 of the 13 attributes identified as embodying the heritage values of the place, only 4 of these have the potential to result in "significant" impacts as defined by the SIG 1.1 Guidelines.

These four attributes were:

1. Physical expression, integrity, legibility, and recognisable key elements of the 1837 Adelaide Plan by Colonel William Light as a city layout with grid plan, encircling Park Lands, contained land parcels and its response to local topography.
2. Defined inner and outer boundary.
3. Legibility of encircling Park Lands.
4. Landscaped Character.

Summary

Question 4: Are any impacts of the proposed new Women's and Children's Hospital to the National Heritage listing of the Adelaide Park Lands and City Layout likely to be significant impacts?

Answer 4: The proposed action has the potential to result in significant impacts to the National Heritage values of the Adelaide Park Lands and City Layout.

10.5 Step 5: Referral Requirements

Step 5: Is a referral required under the EPBC Act in relation to a potential 'significant impact' to the National Heritage values of the Adelaide Park Lands and City Layout?

Note: If question 2 identified no potential for impacts to the National Heritage listing of the Adelaide Park Lands and City Layout, there is no need to undertake a referral under the EPBC Act. The final determination as to whether a referral should be undertaken remains vested in the persons undertaking the action. A referral may be desirable for the following reasons:

- due diligence, as heritage assessments are subjective, and a referral would provide certainty to project outcomes
- risk management, especially for high profile or large scale developments, where an EPBC Act referral pre-construction phase can minimise potential delays following commencement of site works.

This National Heritage Impact Assessment has determined that the following attributes of the Adelaide Park Lands and City Layout are at risk of being significantly impacted by the proposed new Women's and Children's Hospital within Park 27 (Tulya Wardli) (and surrounding excised land):

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

These attributes are associated with the following identified National Heritage values of the place:

Criterion (a) The place has outstanding heritage value to the nation because of the place's importance in the course, or pattern, of Australia's natural or cultural history.

Criterion (b) The place has outstanding heritage value to the nation because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history.

Criterion (d) The place has outstanding heritage value to the nation because

of the place's importance in demonstrating the principal characteristics of: (i) a class of Australia's natural or cultural places; or (ii) a class of Australia's natural or cultural environments.

Criterion (f) The place has outstanding heritage value to the nation because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period.

Criterion (g) The place has outstanding heritage value to the nation because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

Criterion (h) The place has outstanding heritage value to the nation because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history.

10.5.1 Significant Impact Criteria

When considered against the SIG 1.1 Guidelines Significant Impact Criteria the proposed new Women's and Children's Hospital was assessed as having a potential significant impact on the following:

SIG 1.1 Significant Impact Criteria

Criteria	Discussion
Extend, renovate, refurbish or substantially alter a National Heritage place in a manner which is inconsistent with relevant values	The hospital building and car park are inconsistent with open, low scaled landscaped attributes of the place.
Involve activities in a National Heritage place with substantial and/or long-term impacts on its values	The impacts on the Park Lands are long-term impacts
Involve the construction of buildings or other structures within, adjacent to, or within important sight lines of, a National Heritage place which are inconsistent with relevant values	The hospital building and car park are inconsistent with open, low scaled landscaped attributes of the place.
Make notable changes to the layout, spaces, form or species composition of a garden, landscape or setting of a National Heritage place in a manner which is inconsistent with relevant values	The hospital and carpark building have the potential to impact on the legibility of the 1837 Plan and encircling Park Lands

Notably diminish the value of a National Heritage place in demonstrating creative or technical achievement

The construction of the 10 storey hospital building and the 7 storey (above ground) carpark within the encircling parklands will likely result in long term impacts to the legibility of Light's Adelaide Plan

This Self Assessment of the proposed new Women's and Children's Hospital has concluded that several of the SIG1.1 Significant Impact Criteria will be satisfied as to warrant a referral of the project under the EPBC Act.

Summary

Question 5: Is a referral required under the EPBC Act in relation to a potential 'significant impact' to the National Heritage values of the Adelaide Park Lands and City Layout?

Answer 5: Yes

11.0 Summary of Findings and Recommendations

Core components of the new Women's and Children's Hospital include:

- An 10 storey hospital building located mostly within the footprint of the SAPOL land, but also extending northward into the boundary of the National Heritage place.
- A 8 storey carpark structure (7 storeys above ground) with a footprint of around 5,100sqm
- A 2 storey central energy plant
- Landscaping
- Upgrades to Port Road
- Services and stormwater upgrades
- Temporary works

Design refinement and design for the project remains ongoing, as is to be expected for a complex undertaking of this scale.

The project includes a range of measures to intended to mitigate potential impacts to the National Heritage values of the Park Lands within which the site is located, including consideration being given to site setout, screening, landscaping, size, building form, materials and colours. Its design has been assisted by National Heritage design guidelines prepared by DASH Architects, authors of this assessment.

In broad terms, the EPBC Act requires any person undertaking an action to a National Heritage place that may result in a 'significant impact' to undertake a self-assessment in order to determine whether a Section 68 referral to the Minister (responsible for the Act) is necessary. Any referral will then be assessed by the Department of Climate Change, Energy, the Environment and Water (Com) (DCCEEW) to determine whether the action is:

- Clearly Unacceptable
- Controlled Action
- Not a Controlled Action – Particular Manner, or
- Not a Controlled Action.

The purpose of this NHIA is to inform the self-assessment process to inform whether a Section 68 referral under the EPBC Act is warranted. Importantly, this assessment does not consider whether or not the Action should be considered Clearly Unacceptable, Controlled, or otherwise. The responsibility for this subsequent assessment remains vested with DCCEEW.

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 by impacting the following attributes of the place of identified National Heritage value:

- Physical expression of Light’s 1837 Adelaide Plan
- Legibility of encircling Park Lands
- Definition of the inner and outer park lands boundary
- Diversity of use of the place for recreation, sports, events and meeting spaces

These attributes are associated with the following identified National Heritage values of the place:

Criterion (a) The place has outstanding heritage value to the nation because of the place’s importance in the course, or pattern, of Australia’s natural or cultural history.

Criterion (b) The place has outstanding heritage value to the nation because of the place’s possession of uncommon, rare or endangered aspects of Australia’s natural or cultural history.

Criterion (d) The place has outstanding heritage value to the nation because of the place’s importance in demonstrating the principal characteristics of: (i) a class of Australia’s natural or cultural places; or (ii) a class of Australia’s natural or cultural environments.

Criterion (f) The place has outstanding heritage value to the nation because of the place’s importance in demonstrating a high degree of creative or technical achievement at a particular period.

Criterion (g) The place has outstanding heritage value to the nation because of the place’s strong or special association with a particular community or cultural group for social, cultural or spiritual reasons.

Criterion (h) The place has outstanding heritage value to the nation because of the place’s special association with the life or works of a person, or group of persons, of importance in Australia’s natural or cultural history.

The SIG 1.1 Guidelines provide a step-by-step process structured as a series of questions to determine whether a “significant impact” to the National Heritage values of the place may arise from the proposed action. This process includes consideration of mitigation measures used to minimise or avoid heritage impacts. These measures were found to be partially successful in minimising the impacts of the project on the National Heritage Values of the place, particularly with regards to its Landscape Character. This assessment also recommended consideration of the following additional mitigation measures:

1. 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.

2. 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 be generally 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.

3. Landscape screening

Landscape design and plant selections used for screening buildings should be mature selections, and suitable for their intended use and location.

4. Temporary works to roadway in Bonython Park

Existing roadways through Bonython Park used to provide temporary access should maintain their current general configuration (free of kerbs, defined by timber bollards). Any tree removal should be kept to a minimum and not impact the overall landscape qualities of the affected areas of Park Land.

5. Port Road design

Further design development of the proposed Port Road upgrades should provide high levels of pedestrian amenity. Any perimeter landscaping removed to facilitate widening should be replanted to maintain the Park Lands setting of the thoroughfare.

6. Landscape remediation following construction

All areas of Park Lands affected by temporary works are to have their landscaping remediated upon completion of the project to ensure the landscape qualities of the Park Lands are maintained.

7. 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.

The final determination as to whether a referral should be undertaken remains vested under the EPBC Act by the persons proposing to undertake the action, as part of the Self-Assessment process. This NHIA, that is used to inform this Self-Assessment, considers such a referral under Section 68 of the EPBC Act is necessary and recommended.

12.0 Bibliography and References

Adelaide City Archives, various images and maps

Adelaide Economic Development Agency 2023a, 'Emigration Square', Ellis Park / Tampawardli (Park 24), viewed 3 May available at: <<https://www.experienceadelaide.com.au/notable-locations/emigration-square/>>.

Adelaide Economic Development Agency 2021, 'Olive Groves: The first agriculture in the colony', viewed 15 Nov, available at: <<https://www.experienceadelaide.com.au/notable-locations/olive-groves-the-first-agriculture-in-the-colony/>>.

Adelaide Observer 1876, 5 Feb, p.18, 'Olive Culture at the Adelaide Gaol'.

Adelaide Park Lands Association 2023, 'Kate Cocks Park', Adelaide City Explorer, viewed 4 Apr, available at: <<https://adelaidecityexplorer.com.au/items/show/352#:~:text=It%20was%20during%20the%20First,often%20unaware%20of%20her%20approach.>>.

Aitken, R., D. Jones & C. Morris 2006, 'Adelaide Botanic Garden Conservation Study', unpublished report to Adelaide Botanic Garden, Adelaide.

Australian National Herbarium 2022, 'Francis, George William (1800 - 1865)', viewed 17 Jan, available at: <<https://www.anbg.gov.au/biography/francis-george-william.html>>.

Cheesman, R. 1986, *Patterns in Perpetuity: New Towns, Adelaide, South Australia, a Study of Adaptive Planning Processes*, Thornton House, Adelaide.

City of Adelaide 2013, 'Construction Land Management Plan', 17 chapters, City of Adelaide, Adelaide.

City of Adelaide 1983, 'Adelaide Heritage Study', Sep., 8 volumes, City of Adelaide, Adelaide.

DASH Architects 2018 and S. Johnson, 'Adelaide Park Lands and City Layout: Issues and Opportunity Analysis for the National Heritage Listing', for Department of the Environment and Water, Adelaide.

DASH Architects and Peter Bell 2018, 'Heritage Assessment – Adelaide Park Lands and City Squares', May, prepared for Department for Environment and Water, Adelaide.

Department of the Environment 2013a, *Matters of National Environmental Significance: Significant Impact Guidelines 1.1, Environment Protection and Biodiversity Conservation Act 1999*, Australian Government, Canberra.

Department of the Environment 2013b, *The National Heritage List and Commonwealth Heritage List: 1 July 2008 – 30 June 2013*, Dec, Australian Government, Canberra.

Department of Agriculture, Water and the Environment 2021a, 'The Adelaide

Park Lands and City Layout, South Tce, Adelaide, SA, Australia' National Heritage listing place details, Canberra, viewed 12 Nov, available at: <http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=105758>.

Department of Agriculture, Water and the Environment 2021b, 'Managing National Heritage Places', Canberra, viewed 12 Nov, available at: <<https://www.awe.gov.au/parks-heritage/heritage/management/national>>.

Department of the Environment and Energy 2019, *The National Heritage List and the Commonwealth Heritage List: 1 July 2013 – 30 June 2018*, Jan, Department of the Environment and Energy, Canberra.

Department of the Environment, Water, Heritage and the Arts 2008, *Working Together: Managing National Heritage Places*, various parts, Australian Government, Canberra.

Department for Health and Wellbeing (SA Health), *Site Reivew of the new Women's and Children's Hospital*

Environmental Protection and Biodiversity Conservation Act 1999 (Com)

Environment Protection Biodiversity and Conservation Regulations 2000 (Com)

History Trust of SA 2021, 'Kaurna people', *Adelaidia*, viewed 15 Nov, available at: <<https://adelaidia.history.sa.gov.au/subjects/kaurna-people>>.

Jones, D. 2007, 'Adelaide Park Lands and Squares Cultural Landscape Assessment Study', (7 volumes), unpublished report to City of Adelaide, available at: <<http://www.adelaideparklands.com.au/plans-policies/cultural-landscape-study/>>.

Linn, R. 2006, *Those Turbulent Years: a History of the City of Adelaide 1929-1979*, Adelaide City Council.

Marsden, S., P. Stark and P. Sumerling (eds.) 1990, *Heritage of the City of Adelaide: An Illustrated Guide*, Corporation of the City of Adelaide, Adelaide.

Mosler, S. 2006, 'Heritage Politics in Adelaide during the Bannon Decade', PhD thesis, University of Adelaide.

National Railway Museum 2023, 'A brief history on Railways in South Australia', viewed 11 May, available at: <<https://nrm.org.au/connect/blog/11-a-brief-history-on-railways-in-south-australia#:~:text=The%20Formation%20of%20the%20South,railway%20in%20the%20British%20Empire.>>>.

NSW Heritage Office 2001, *Assessing Heritage Significance*, Parramatta NSW.

Painter, A. 2023, '24 November 1840 First Adelaide Hospital', Professional Historians Association, viewed 3 May, available at: <<http://www.sahistorians.org.au/175/chronology/november/24-november-1840-first-adelaide-hospital.shtml>>.

State Library of South Australia 2023, 'Adelaide – Hospitals', Manning Collection, viewed 3 May, available at: <<https://manning.collections.slsa.sa.gov.au/adelaide/hospital/hospital.htm>>.

- State Library of South Australia, various images, available at: <slsa.sa.gov.au>.
- State Records of South Australia, various images and maps.
- Sumerling, P. 2011, *The Adelaide Parklands: A Social History*, Wakefield Press, Adelaide.
- Swanbury Penglase Architects 2003, 'Thebarton Barracks Conservation Plan', Oct, prepared for the Department for Administration and Information Services, Adelaide.
- The Advertiser* 2013, 25 Feb, '\$3.5M children's road safety centre opens at Thebarton Police Barracks', viewed 4 Apr, available at: <<https://www.adelaidenow.com.au/news/south-australia/m-childrens-road-safety-centre-opens-at-thebarton-police-barracks/news-story/d1a64e3e874bde938087536bb840c85d>>.
- University of South Australia 2023, 'General Information about the Women's and Children's Hospital (WCH)', viewed 29 Mar, available at: <<https://lo.unisa.edu.au/mod/page/view.php?id=542368>>.
- Women's and Children's Hospital 2023, 'History of the WCH', viewed 29 Mar, available at: <<https://www.wch.sa.gov.au/about/wch-history>>.
- WPS 2021, 'Environmental Protection and Biodiversity Conservation Act (EPBC Act) EPBC Risk Assessment: New Women's and Children's Hospital', Sep, prepared for the Department of Infrastructure and Transport, Adelaide.