Comment on Adelaide Circuit Redevelopment (ACR) Project 2026/10637

Introduction:

1. Adelaide's South East City Residents Association (SECRA) believes the above action is likely to have notable impacts on a matter of national environmental significance, hence is a 'controlled action' requiring ministerial approval under the EPBC Act. Accordingly we contest the 'Adelaide Circuit Redevelopment EPBC Act Self-Assessment Report' (compiled by URPS), the 'Adelaide Circuit Redevelopment EPBC Act National Heritage Self-Assessment' (by Stenhouse Heritage) and the summary 'Project Description' of the South Australian Motor Sports Board (SAMSB),

2. Inclusion of the 'Statement of Reasons for EPBC 2023/09606' as Appendix C to the URPS Self-Assessment report (see also ibid., p. 16) suggests that the proponents may wish to rely on the same basis as that set out in paras. 47-52 of the same Statement. But the reasons why sections 15B and 15C were held not to apply to that proposed action are irrelevant to the present case. For SAMSB is clearly a constitutional corporation, and engaged in international trade or commerce for the purpose of staging motor sports events. Hence sections 15B and 15C of the EPBCA are relevant controlling provisions for the proposed action, which would have a significant impact upon the National Heritage values of the Adelaide Park Lands, a National Heritage place.

3. The Department of Environment's 'Matters of National Environmental Significance Significant impact guidelines 1.1' recommends that, when determining the likely impact of a projected action, persons 'should be as objective as possible' (p. 3). However, the extensive supporting material submitted by the proponent is highly partisan throughout. Thus the opening sentence of the summary project description, claiming that 'South Australia is recognized as Australia's motorsport capital', might well be questioned on behalf of Victoria's Formula 1 Gran Prix or NSW's Bathurst 1000.

4. It would be tedious to identify every dubious assertion propounded by these documents. But an immediate further example occurs in the second paragraph, which states that it is proposed to create the 'first modern **city centre** MotoGP circuit... through **adaptation** of existing infrastructure and road corridors within Adelaide, including sections of the Adelaide Park Lands' [emphasis added]. Yet the proposed 'redevelopment' (more accurately, extension) of the existing circuit includes no more than the East Terrace low-rise fringe of Adelaide's central business district.

5. More important, the greater part of its 4.1 km estimated length would be constructed not only within Park 16 (where motor sport events have been based since 1985, with an intermission 2018-2022) but by laying 12-15 metre wide bitumen pavement and associated run-off areas through Parks 14 and 15, hitherto completely untouched in this fashion. Indeed the actual street portion of the envisaged circuit (running from Wakefield Street via Rundle Street East to East Terrace, then crossing Bartels Road and Wakefield Street) appears to account for only some 1.5 km of its total length.

6. The SAMSB 'Project Description' devotes several paragraphs to 'key benefits identified for the ACR project'. These include the seemingly contradictory provision of a 'street circuit' for the

MotoGP, and ‘showcasing the city street circuit in a parkland setting’. It is also asserted that the event will attract ‘a global audience of more than 630 million people’, without indicating how that figure is calculated (any more than the claimed economic benefits). Yet the document concludes by emphasizing that ‘annual Event activities’ do not form part of the proposed action. This is an unconvincing attempt to avoid discussion of the disruption to the amenity of adjacent residents and the community at large likely to result from traffic congestion, unprecedented noise levels, lack of access to public parklands, impact on wildlife and other detrimental effects during the MotoGP.

With respect to National Heritage:

7. The two longer and equally tendentious commissioned self-assessment report maintain that the envisaged action will result in only ‘localised changes to the Adelaide Park Lands and City Layout’ without ‘significant impact on the National Heritage values of the place’ (Executive Summary, Stenhouse, p. iv; Conclusion, URP, p. 51). Both documents follow a broadly similar approach in reaching negative conclusions on the crucial issue of significant impacts. But both make it clear that they are reporting on a proposal still in preliminary design phase; indeed the Stenhouse report (dated 31 August 2026) relies on data current in mid-July 2026 (p. 9), while the URP self-assessment is based on ‘functional characteristics of the proposed circuit...rather than a fully detailed final design’(p. 2).

8. The contingent and even tentative nature of Adelaide Circuit Redevelopment planning was borne in on two SECRA representatives who attended a meeting on 12 September 2026 with other south-east city residents, convened by the Minister and member for Adelaide, Ms Lucy Hood, and attended by representatives of SAMSB and the Premier of South Australia, Mr Peter Malinauskas. On this occasion the Premier made a verbal commitment to examine the feasibility of moving the proposed circuit track in Park 15 from the southern to the northern side of Botanic Creek, thereby sparing the existing olive grove and easing the impact on residents of East Terrace. Such apparent flexibility, even at a relatively late stage before the scheduled commencement of works on 1 December, helps explain the markedly vague and non-specific nature of the two commissioned self-asssessment reports, which must be regarded as premature.

9. The overall strategy adopted by both reports is to emphasize the relative insignificance of the area directly affected by the proposed action, purportedly less than 1 per cent of approximately 1000 hectares (in relation to the Adelaide Park Lands and City Layout as a whole National Heritage Place) and the long-established diversity of use of the Park Lands proper (Stenhouse, p. iv). By way of a general response, before considering the detailed impact assessment tables of the two reports, the distinctive nature and unique qualities of the Adelaide Park Lands and City Layout are recognized by its National Heritage listing (especially under criteria a, b,d, and f).

But while aerial photography, maps and plans can convey the image of a figure-of-eight green belt surrounding Light’s planned city street layout, the everyday experience of the Parklands for both residents and visitors is inevitably localized, confined to what they can see and sense when they enter or pass by a particular park or parks. Further, the various uses to which these parks have been put in the past (including public executions, to take an extreme example) obviously cannot and should not determine how they are treated today and into the future. Social norms and cultural perspectives obviously change over time. But preserving the

essentially natural (or park like) character of Adelaide's unique Park Lands must be a given. That is why the proposed extension of the existing motor-racing circuit both within Park 16 and into Parks 4 and 15 has aroused so much opposition.

10. Table 4 of the Stenhouse report and Tables 3.2, 3.3 and E.3 of the URPS report both seek to demonstrate that neither actual nor potential significant impact on the National Heritage Values of the Adelaide Parklands stems from the proposed action. The URPS report claims to be informed by the specialist assessment of Stenhouse but to 'represent an independent project level assessment' of the possibility of significant impact on Matters of National Environmental Significance (MNES) as defined by the EPBC Act. As such, it is the prime focus of the following comments and discussion.

11. Table 3.2: Construction Phase (URPS, pp. 31-3)

•Construction is said not to affect the spatial structure established by the 1837 Adelaide plan. But the proposed insertion of a 12 -15 metre wide bitumen track through the south-west corner of Park 14, between East Terrace and Bartels Road, creates an isolated or at least distinct small triangle of park land, morcellation incompatible with Light's plan.

•The 'Landscape Character' entry refers to 'localised vegetation removal and ground disturbance', albeit 'confined to a discrete area within a broader and continuous Park Lands system'. Since not 'at a Park Lands scale' it is said 'not to meet the EPBC significant impact threshold'. This seems to ignore the Significant Impact Guidelines, which note (p. 22) that 'it is not necessary for an action to impact upon the whole of a National Heritage place, all of the values of a National Heritage place, or the whole value of a National Heritage place, It is sufficient if an action is likely to have a significant impact on a part, element, or feature of a National Heritage place which embodies, manifests, shows or contributes to the values of that place'.

•Under the same heading, removal of 'a number' of olive trees within Park 15 is identified as 'the most notable change associated with the proposed works'. This may well be so, as it involves the loss of an unknown number of olives (*Olea europea*) planted more than 150 years ago to provide the basis of a new industry, and subsequently curated by the Adelaide City Council. This olive grove (like its equally threatened counterpart in the north-western corner of Park 16,which the 2024 National Heritage Management Plan characterises as 'notable due to its lack of alterations evident dating as far back as 1936... The grid on which the trees have been planted is still quite defined and maintained'), is not specifically identified as an attribute contributing to the National Heritage values of the Adelaide Park Lands and City Layout on the National Heritage List. But that is hardly surprising, since the 2008 *Gazette* notice of inclusion of the Adelaide Parklands and City Layout in the National Heritage List runs to only two and a half pages, which mention no specific landscape features other than the Torrens River. However, value (f) does include 'plantations' as significant elements in the 'overall landscape planting design'. See also the previous bullet-point and paragraph 9 above.

•Delineation of the Park Lands and City layout is affected by the intrusion of wide pavement track through Parks 14 and 15, and envisaged earthworks of considerable scale required to create

an elevated level but slightly sloping surface in the undulating landscape of Park 15. This would destroy the integrity of its current natural, even sylvan character, and effectively divide Park 15 on either side of the circuit track.

•The sole purpose of the proposed action is to enable an effective doubling of annual motor sport events from one to two weeks by staging the MotoGP, a commercial operation which like the existing car race is accessible only to paying customers. This seems incompatible with the long-term function of the park lands as publicly accessible open space. Until 1985 the only racing events staged in Park 16 were horse races, which the public could freely watch, while car races were discontinued by the previous state government between 2018 and 2022. So as the National Heritage Management Plan notes, Victoria Park/Pakapakanthi (Park 16) has been 'a venue for equestrian events for most of its history'. Further, when various popular events are staged in Parks 13 and 14 (e.g. The Adelaide Fringe, Gluttony, Garden of Unearthly Delights) the parks themselves remain freely open to the public.

12. Table 3.3 Ongoing Presence and Use of Infrastructure Works (URPS, pp. 33-6)

•1837 Adelaide Plan: it is claimed that the infrastructure works 'do not modify the arrangements of roads, blocks, squares, or park lands that contribute to the expression of the 1837 plan. But see above re the division of Parks 14 and 15 by the insertion of bitumen track and related earthworks.

•Landscape Character: the proposed permanent changes to the Park Lands are said to occur 'within an already modified and intensively managed landscape', to be 'localised' and without effect on the 'broader topography, spatial structure or landscape framework of the Adelaide Parklands'. But as with the same entry in Table 3.3, this seems to ignore the relevant note on p. 22 of the Significant Impact Guidelines. It is indeed hard to visualise how much change and of what kind to how many individual parks would be required to meet the stated threshold level of 'fundamental or enduring change to landscape character at a Park Lands scale'.

•Delineation of Park Lands: see first bullet point above.

13. Conclusion

The more recent URPS report does not mention National Heritage List Value (g), regarding the 'place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons'. However the Stenhouse report does address this matter, albeit in somewhat oblique fashion, maintaining that divers uses of the Parklands will be maintained, despite 'minor changes' to 'Longevity of the involvement of community groups in campaigning for the protection and safeguarding of the Park Lands' (p. 64).

The meaning of this last clause is unclear. It probably does not intentionally refer to the massive groundswell of public opposition and protest directed against the present action and its proposed purpose, involving not only SECRA but the Adelaide Parklands Association (immediate descendant of the Adelaide Parklands Preservation Society), and other community groups. Protest marches and rallies on a scale seldom seen in Adelaide have united around the slogan 'Stop the Chop' (referring to the proposed removal of at least several hundred trees in Parks 14,15 and 16 to make way for the expanded circuit). A recent hard-copy petition calling for a

state parliamentary enquiry into the MotoGP attracted 43,784 attested signatures, the largest number of any such petition in the past quarter century, while social media posts and letters to the editor of the *Advertiser* continue to question the rationale of the MotoGP on many grounds, and advocate its removal from Adelaide to the purpose-built motor-sports facility at Tailem Bend.

In light of all the above considerations, SECRA urges the Minister and his advisers to recognise the need of ensuring that the current action becomes the subject of a truly independent environmental assessment, as provided by the EPBC Act.

Respectfully submitted

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