

EPBC Act Self-Assessment Summary

North Adelaide Public Golf Course Redevelopment

Purpose and Overview

This document is a summary of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) self-assessment undertaken for the North Adelaide Public Golf Course Redevelopment Project (the Project). It explains what was assessed, how the assessment was undertaken, and the basis on which conclusions were reached.

The Project comprises the comprehensive redevelopment and upgrading of the existing North Adelaide Public Golf Course within the Adelaide Park Lands, including the delivery of a championship course. It involves the reconfiguration of the course layout, replacement and renewal of ageing infrastructure, and delivery of contemporary facilities to support ongoing public use, recreation and future events. The Project builds upon the long-established use of the site as a golf course, retaining its function as open, predominantly vegetated recreational land, while modernising facilities and improving usability for current and future generations.

Under the EPBC Act, the Project constitutes an 'action', that being a development and associated activities carried out within the Adelaide Park Lands. An 'action' must be referred to the Commonwealth Environment Minister where it is likely to have a significant impact on Matters of National Environmental Significance (MNES). The EPBC Act does not prohibit impacts, rather, it establishes a threshold test requiring referral only where impacts are important, notable, or of consequence.

The self-assessment was undertaken to determine whether the Project gives rise to a real chance or possibility of a significant impact on MNES. The assessment considered the Project as a whole, including construction and ongoing operation.



Matters Considered in the Self-Assessment

As part of the self-assessment, a structured scoping exercise was undertaken to identify which MNES required further consideration within the self-assessment. This included drawing on Commonwealth database searches, technical investigations, and site-specific studies.

The process confirmed that all MNES categories were considered, including heritage places, threatened species and ecological communities, migratory species, wetlands, and other prescribed matters under the EPBC Act.

Two MNES were identified as requiring further consideration within the self-assessment:

- National Heritage values of the Adelaide Park Lands and City Layout.
- Grey-headed Flying Fox (a listed threatened species).

Assessment Approach and Methodology

The self-assessment was undertaken in accordance with the EPBC Act and relevant Commonwealth guidance, including the Significant Impact Guidelines.

Assessment framework

Both the construction and operational aspects of the Project were assessed. A conservative approach was adopted, including consideration of a worst-case impact scenario, particularly in relation to vegetation removal.

Information sources

The self-assessment was informed by a combination of:

- Commonwealth database searches, including the Protected Matters Search Tool.
- Review of relevant legislation, policy and heritage frameworks.
- Technical investigations and advice from independent specialists.
- Site inspections and targeted ecological and heritage studies.

This process established an evidence-based understanding of the environmental context and the presence (or absence) of relevant MNES.

Impact evaluation

Potential impacts were assessed having regard to their:

- Scale
- Intensity
- Duration
- Spatial Extent

The self-assessment considered both direct and indirect impacts, including cumulative effects where relevant.

Key Findings – National Heritage Values

The Adelaide Park Lands and City Layout is included on the National Heritage List for its outstanding heritage value to the nation under multiple criteria. These values relate to:

- The enduring expression and legibility of Colonel Light's 1837 Plan.
- The encircling parkland structure and clearly defined city boundary.
- The principal characteristics of a planned colonial city, including spatial layout and open space.
- The landscape character and setting of the Park Lands as a continuous green belt.
- Its role as a place for public use, recreation and community life.
- Its historical associations, including with Colonel William Light.

These criteria collectively reflect the Park Lands as a large scale, integrated landscape system defined by its structure, openness, and ongoing recreational use.

Assessment outcome – National Heritage Values

The assessment considered whether the Project gives rise to a real chance or possibility of a significant impact on the National Heritage values of the Adelaide Park Lands and City Layout. In this context, the Project does not result in changes to the key attributes that underpin the National Heritage listing. Specifically:

- The spatial structure and legibility of Colonel Light’s 1837 Plan are not altered, with no changes to the broader city layout or its relationship to the Park Lands.
- The encircling form and extent of the Park Lands remain intact, with no encroachment into new areas or alteration to the city–park boundary.
- The open, predominantly vegetated character of the landscape is maintained, with the golf course continuing to function as part of the broader green belt surrounding the city.

While the Project involves vegetation removal and landscape modification, these changes:

- Occur within an existing, highly modified recreational landscape.
- Are spatially dispersed and localised within the golf course footprint.
- Do not affect identified landscape structures or defining features of the Park Lands.
- Are offset through a minimum 3:1 tree replacement requirement, ensuring long term canopy renewal.

As a result, the majority of the existing tree canopy and landscape framework remains in place, and the overall composition and visual continuity of the Park Lands are retained. The tree removal does not alter the overall treed character or spatial composition of the Park Lands at a scale relevant to its National Heritage significance.

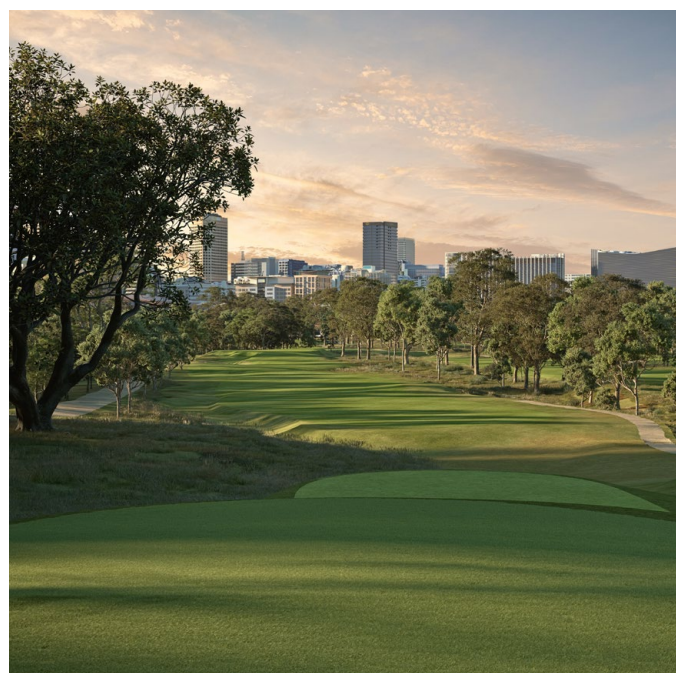
Potential impacts to landscape character and public access are:

- Temporary or limited in duration.
- Managed through established environmental controls secured by State legislation.
- Consistent with the ongoing recreational use of the site.

Having regard to the scale, extent and context of these changes, the Project does not result in the loss, degradation, or notable modification of the National Heritage values of the Park Lands. Accordingly, the impacts do not meet the threshold of a significant impact under the EPBC Act.

Cumulative impacts – National Heritage Values

The potential for cumulative and incremental impacts was considered as part of the self-assessment of National Heritage Values. The Project represents a single, coordinated redevelopment within an existing and established recreational use, rather than a series of incremental or piecemeal changes. As such, the Project does not contribute to cumulative impacts of the type that would erode the structure, continuity or defining characteristics of the Park Lands at a landscape scale relevant to its National Heritage significance.



Key Findings – Grey-headed Flying Fox

The Grey-headed Flying Fox is a listed threatened species that utilises urban landscapes, including the Adelaide Park Lands, for foraging. No roosting camp is present within the Project area, with the nearest known camp located approximately 1.5 kilometres away. The species is highly mobile and relies on a broad regional network of foraging resources across the wider metropolitan landscape.

The Project will result in some localised reduction in foraging habitat due to vegetation removal. However, the scale of this impact is small in the context of the available regional habitat. Extensive alternative foraging resources remain accessible, and replacement planting will support the long-term regeneration of foraging habitat. Construction and operational impacts, including potential disturbance, are managed through established State legislated environmental measures.



Assessment outcome – Grey-headed Flying Fox

The Project does not affect population viability, breeding or roosting behavior, or any critical habitat for the species. Having regard to the scale, extent and context of impacts, there is no real chance or possibility of a significant impact on the Grey-headed Flying Fox under the EPBC Act.

Mitigation Measures and Certainty of Outcomes

A range of environmental management measures have been developed for the Project and are secured through statutory approvals under the Planning, Development and Infrastructure Act 2016 and legislative requirements of the North Adelaide Public Golf Course Act 2025. These include construction and operational environmental management plans and a mandated minimum 3:1 tree replacement requirement.

Importantly, these measures are not conceptual. They are formally approved, enforceable, and embedded within the statutory framework governing the Project, including requirements under State legislation. This provides a high level of certainty that potential impacts will be avoided, minimised and appropriately managed.

Conclusion

An EPBC Act self-assessment was undertaken through a structured and evidence-based process, supported by technical specialists and investigations considering the Project as a whole. The assessment identified relevant MNES, applied the Significant Impact Guidelines, and evaluated potential impacts having regard to their scale, extent and context, including cumulative effects.

The EPBC Act establishes a threshold test requiring referral only where there is a real chance or possibility of impacts that are important, notable or of consequence to MNES. The presence of MNES, in itself, does not trigger referral.

On this basis, the self-assessment finds that there is no real chance or possibility of the Project resulting in a significant impact on MNES. Impacts are localized in scale, occur within an existing and modified landscape, and are subject to enforceable management measures secured through statutory approvals.