

The Chair
Heritage Council
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Wednesday 13 February 2019

RE: Submission Against the ANZAC Oval Proposed Heritage Declaration

Dear Chairperson,

Please find following a submission in relation to the ANZAC Oval proposed heritage declaration. Tourism Central Australia does not believe the site encompassing the ANZAC Oval meets the Northern Territory Heritage Act requirements for being listed as a Heritage Site.

Firstly, I will outline who our organisation is and what we do, to provide context to this submission. I will then provide the reasons why Tourism Central Australia (TCA) believes that the proposal to include ANZAC Oval on the Heritage Register should not proceed.

Tourism Central Australia

TCA is one of two official Regional Tourism Organisations (RTOs) in the Northern Territory (NT), with the other being Tourism Top End. TCA is a not for profit membership-based organisation, with over 340 tourism business members from around Australia. Members are primarily located in the areas of Uluru/Yulara, Kings Canyon, Alice Springs, the MacDonnell Ranges, Tennant Creek, the Barkly and up to and including Elliot and Newcastle Waters. We are responsible for marketing the Red Centre region (#RedCentreNT on social media channels), providing member businesses with advice and industry insights, operating the Alice Springs Visitor Information Centre and advocating to Government and stakeholders on behalf of our members for pro-tourism policies and developments. It is in the context of the latter purpose of our organisation that we offer this submission.

Northern Territory of Australia Heritage Act (As in force 1 May 2016)¹

According to the act, there are eight main criteria for the consideration of a place for heritage listing (Chapter 1, Part 1.2, Division 2, Section 11, Pages 8-9). These eight criteria can be summarised as follows:

- a) Importance to the course of the Northern Territory's (NT's) history
- b) Features rare aspects of the NT's history
- c) Has potential to yield information that will help understand the history of the NT
- d) Is important in demonstrating the principal characteristics of natural places or environments

¹ See <https://legislation.nt.gov.au/Legislation/HERITAGE-ACT>

- e) Has important aesthetic characteristics
- f) Demonstrates a high degree of technical achievement
- g) Has a strong association with a group of people, including Aboriginal cultural traditions
- h) Has a special association with a person or group of importance to the history of the NT

The concerns TCA have if the heritage listing goes ahead for the ANZAC Oval site are several. According to the Act, the provisions of the heritage agreement may include (but are not limited to) the following²:

- Restriction of use of the site
 - The site has many uses, particularly as an events space. To regulate the use of the site would endanger the significant events hosted on the site.
- Restriction of work on the site
 - As the site has had many modifications over the years and is even undergoing modification at the time of the heritage proposal (fencing), restrictions on the work conducted on the site would hamper its ongoing functionality.
- Regulation of admission charges
 - The hosting of events on the grounds are often organised by not for profit organisations, and sometimes by significant commercial interests. Regulation of the fees charged for access would hamper their ability to recover costs and make money on their events.
- Protection of built assets and infrastructure on the site, restricting them from being relocated if required in future.
 - Both Rugby Union and Rugby League have publicly stated that they require a new site, and their expansion will require two fields and better change room facilities. Expansion to two fields is not workable on the ANZAC Oval site, and so new fields will need to be found to accommodate them. Existing infrastructure such as the stadium may not be able to be moved to a new site if the place is heritage listed, increasing costs for these not for profit clubs. As well as this, with the clubs moving to other premises, heritage listing of the site will restrict the ability for it to be repurposed for other activities and events. Even if the two clubs do not move, works on the existing infrastructure may be restricted if heritage listing is approved, making the site unworkable into the future.

Heritage Act Statement of Heritage Value, ANZAC Oval, Alice Springs³

According to the Statement of Heritage Value, the ANZAC Oval site has the following attributes (own summary):

² As per Chapter 3, Part 3.2, Section 69, Page 29, at

<https://legislation.nt.gov.au/Legislation/HERITAGE-ACT>

³ See https://dta.nt.gov.au/_data/assets/pdf_file/0008/638684/Statement-of-Heritage-Value-Anzac-Oval.pdf

- Established in the 1930s by returned service people
- Was a sporting facility prior to the war, and then hosted soldiers during World War II
- The Totem Theatre, with its Sidney Williams huts, is on the site
- Has since World War II been a sporting facility and hosted events and festivals, including being home to Rugby League, Rugby Union and the first site for the Alice Springs Show
- Was the first grassed sporting and event facility in Alice Springs, developed by community members
- Is in a picturesque setting
- Is considered a local landmark
- Has held sporting events, including ones with Aboriginal participants
- Contains several sacred sites

Following, each of these bullet points will be compared with the Heritage Act, to understand if Heritage Listing is required to protect these values.

Established in the 1930s by returned service people

This value seems to relate to items g) and h) of the Heritage Act. It is true and important that Alice Springs and the NT have a proud tradition of honouring military service personnel. However, the site has been so altered in the intervening years that it has rendered the preservation of the existing site irrelevant, as it does not resemble what it once did⁴.

Was a sporting facility prior to the war, and then hosted soldiers during World War II

This value seems to relate to item a) of the Act. The site has, since World War II, been reshaped as a sporting facility again. Whilst the site is no longer resembles what it did in World War II, interpretation of the military service and history of Alice Springs has been preserved on the protected site known as ANZAC Hill (protected both as an Aboriginal Protected Area and on the Heritage Register for its military honouring significance), and also on a cycle and pedestrian path that runs along the bank of the Todd River north to the site known as the Alice Springs Old Telegraph Station. The military significance of the area is therefore already interpreted through the heritage listed ANZAC Hill memorial⁵, and through the walkway along the Todd River. It must be considered also that the pathway with military history interpretation on it at several points runs within protected sacred sites that are protected. These sacred sites will be considered later in this submission.

⁴ For examples of this, view the following photos in successive order:

https://cdn.exploroz.com/images/forum/uploads/72151_262_TN1000x800.jpg?gid=131022, taken during World War II and therefore after when it was first established, <http://www.bonzle.com/pictures-over-time/pictures-taken-in-1962/page-2/picture-7yyc43xs/size-4/alice-springs/northern-territory-alice-springs>, and then its current form at <https://www.austadiums.com/stadiums/stadiums.php?id=259>.

⁵ See

http://www.ntlis.nt.gov.au/heritageregister/f?p=103:302:3360608034921814::NO::P302_SITE_ID:9

The Totem Theatre, with its Sidney Williams huts, is on the site

This item seems to relate to e) in the Act. Thankfully, the significant Totem Theatre historic site, that is a physical reminder of exactly what the area looked like during World War II, is already protected under the Heritage Act⁶. Nominated for heritage listing in 2001, and gazetted as a heritage listed site in 2006, this important piece of the NT's history is already protected, and so does not require further protection.

Has since World War II been a sporting facility and hosted events and festivals, including being home to Rugby League, Rugby Union and the first site for the Alice Springs Show

The seems to relate to item a) of the Act. The sporting history of the site is interesting, but in TCA's opinion, does not warrant heritage listing. In fact, with the plan for both Rugby League and Rugby Union to move to a venue with more space and the potential to have two playing fields, heritage listing ANZAC Oval could create an unused and unkept site in the middle of Alice Springs (given that the site has little room for expansion).

Events and festivals are an important part of the fabric of Alice Springs life. Many venues host these; ANZAC Oval being one of them. The Alice Springs Show is now hosted at Blatherskite Park, due to how large the event is. The ability to host festivals and events is important, however does not align with any of the items in the Act for which heritage listing is granted. In fact, if heritage listing goes ahead, there is the potential for caveats and restrictions to be placed on events and activities at the site, making it more difficult for those to be hosted successfully.

Was the first grassed sporting and event facility in Alice Springs, developed by community members

This seems to relate to item g) of the Act and is a similar value to the one mentioned earlier about the establishment of the site. The community's involvement in the establishment of the facility is interesting, however in itself does not warrant heritage listing. That it was the first grass oval in Alice Springs is also interesting, however does not directly relate to any of the items in the Act. It could be argued that it relates to item a), but heritage listing of the site will not just protect the grass but could place unnecessary restrictions on the whole site including built infrastructure with arguable heritage value.

Is in a picturesque setting

The beauty of the area is certain. Therefore, it is good that the Anzac Hill site and the Todd River, which provide the aesthetic qualities around the site being referred to, are protected given the number of sacred sites situated on, in and around them. The protection listings for these areas are available via a non-public search and enquiry through the Aboriginal Areas Protection Authority.

⁶ See

http://www.ntlis.nt.gov.au/heritageregister/?p=103:302:1561787766175873::NO::P302_SITE_ID:145

Is considered a local landmark

The ANZAC Oval is definitely considered a local landmark, and this seems to relate to item d) of the Act. The issue with this, though, is that the ANZAC Oval is a human changed landscape. It is not a natural place or environment. As has been demonstrated earlier in this letter, the site has been changed several times throughout the years, and so does not resemble the natural environment it once was, nor does it resemble its original modification.

Has held sporting events, including ones with Aboriginal participants

This has been discussed when addressing the item regarding being a sporting facility and having hosted and continuing to host events. The addition of Aboriginal sporting participants to this value may relate to items g) and h) of the Act, although it is difficult to find any evidence of the ANZAC Oval being a site that is incorporated into cultural traditions as per item g).

Contains several sacred sites

The ANZAC Oval site features several Aboriginal sacred sites, and so it is good that these sites are protected. A non-public search and enquiry through the Aboriginal Areas Protection Authority reveals a range of Restricted Area of Works (RAWs) around the sacred sites. This means that the sacred sites within the ANZAC Oval precinct are protected given their significance to Aboriginal culture. It is good that these sites are already protected, and therefore don't require further protection.

Summary

As can be seen, when considering the Heritage NT Act, the ANZAC Oval is an interesting and important site, however, does not meet the requirements of the Act for heritage listing. The heritage listing of this site would create negative impacts on the events potential of the area, plus limit works that may be necessary and beneficial to the place.

Thank you for your consideration of this document, and if you have any questions, please do not hesitate to contact me at stephen.schwer@discoverca.com.au.

Yours sincerely,



Stephen Schwer
CEO