



**Adelaide
Park Lands
Association**

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Department for Infrastructure and Transport
Government of South Australia
Circuit Development Consultation
Email: circuitredevelopment@sa.gov.au

RE: SUBMISSION ON THE ADELAIDE CIRCUIT REDEVELOPMENT

Adelaide is world renowned as a city within a park. The Park Lands are nationally listed heritage, a defining feature of Adelaide's identity, and a critical piece of climate-resilience infrastructure. They are the "green lungs" of the city and a daily refuge for thousands of residents and visitors. Their protection is a duty owed to future generations.

The Adelaide Park Lands Association (APA) is a community organisation concerned with the protection, conservation and public enjoyment of the Adelaide Park Lands (the Park Lands). APA's longstanding guiding position is that the Park Lands should remain open, green and public. Since 1987, APA and its predecessor organisation have advocated for the Park Lands to be protected from alienation, inappropriate development, excessive commercialisation, loss of open space, loss of public access and damage to their landscape and heritage character.

Over many years, APA has engaged in public education, community advocacy, guided walks, research, publications, submissions, media commentary, public forums, rallies and campaigns concerning the Park Lands. These activities have included campaigns and publications about the history, heritage, cultural landscape, biodiversity, public use and civic value of the Park Lands.

As a preliminary but important point APA is of the view that a development of this significance in a sensitive location calls for meaningful and transparent engagement with interested stakeholders. This includes the release of expert evidence outlining the potential impacts of the redevelopment and affording opportunities for the public to make submissions. This has not occurred with this survey process.

APA is opposed to the location of the MotoGP project (the project) in the Park Lands due to its many unacceptable impacts as discussed below. APA is very concerned about the permanent changes to the Park Lands which are not justified for an event held for only a few days each year.

APA strongly urges the South Australian government to abandon this project in the Park Lands and relocate the event to a purpose-built venue such as The Bend as a practical, lower-impact and economically viable solution. This venue could be used for the event and not cause any damage to the Parklands or disruption in Adelaide.

The Bend already has international-standard facilities, accommodation, medical infrastructure and scope for tourism packages linking Monarto Safari Park, wine regions and river tourism. Attendees could take bus services to the Bend and still stay in the CBD. This would have the added benefit of spreading economic benefits to regional centres such as Murray Bridge and Mount Barker.

From our advocacy work APA is aware that many in the community share our opposition to the project in the Park Lands when an alternative location is readily available. Many South Australians connect Park Lands protection to statewide priorities: climate leadership, health, housing, and regional development. Regardless of where they live, they treat the Park Lands as a shared state asset and concerns about this project go beyond the personal. It is a project with broader concerns about climate, heritage, fiscal responsibility and democratic integrity.

A. ECONOMIC AND FISCAL CONCERNS

Costs v Benefits

The proposed circuit is largely a city circuit in a park. It will require extensive remodelling of the Eastern Adelaide Park Lands, including a new 12-metre-wide racetrack carved through the southern end of the park down to South Terrace. The circuit will loop across playing fields, cut through the central garden, and remove trees before joining the V8 pit

lane and exiting onto Wakefield Street, likely removing more trees in the process.

The project will require extensive infrastructure: pit lane facilities, paddock areas, team garages, hospitality zones, medical centres, media centres, grandstands and spectator areas. The track and run-off areas require removal of every streetlight, stobie pole, bus stop, kerb, traffic light, street sign, manhole cover and storm drain along the racing line. For safety reasons FIM regulations require gravel run-off areas 25 cm deep, temporary pits must be dug, lined, filled and later restored.

The costs will be significant and the benefits are uncertain. The South Australian Government has not released a cost benefit analysis for the project which has led to concerns that it is overstating the benefits and ignoring significant costs. APLA is very concerned that the project will consume far more public resources than it generates.

The government has said that the project circuit will cost \$96 million, however there are many additional costs including construction of a temporary pit building, drainage, stormwater, power works and gravel logistics. Hosting fees, annual costs, penalties, and contractual guarantees remain undisclosed. There will be extra costs created in other budgets such as police and health. Ultimately it is unclear what will be the actual financial, economic and environmental costs of building a MotoGP standard racetrack within the Park Lands and on major city arterial roads and holding races on it every year for the next six years.

Andrew Milazzo's "Is the MotoGP Worth the Gain?" report, notes that MotoGP could cost taxpayers up to \$360 million over six years rather than delivering a net windfall. He estimates the following costs:

- Specialised Gravel Purchase: \$1.5M – \$3.0M (Initial one-off cost to source ~10,000+ tonnes of FIM-spec, pre-washed rounded stone)
- Park Lands Excavation & Prep: \$1.5M – \$2.5M (Annual cost to dig temporary 25–30cm pits into park land zones and install liners)
- Laying & Leveling: \$400K – \$700K (Annual cost to haul stone into the CBD and fill trap zones flush to the track edge)
- Vacuum Removal & Transport: \$600K – \$1.0M (Annual cost for heavy industrial vacuum equipment to extract gravel post-race)
- Washing, Screening & Storage: \$300K – \$500K (Annual cost for off-site cleaning to remove dirt/debris and secure yard storage outside the CBD)

- Park Lands Remediation: \$1.0M – \$2.0M (Annual cost to refill excavated zones with soil and returf grass areas post-event)
- Total Initial Setup Cost: \$3.0M – \$5.5M (Year 1)
- Ongoing Recurrent Annual Cost: \$3.8M – \$6.7M (Yearly removal, washing, storage, and park restoration)

There are also opportunity costs associated with this project. The government projected expenditure of at least \$96 million could instead support ambulance ramping reduction, hospital capacity, housing affordability, aged and disability care, climate resilience and arts and cultural infrastructure. These investments provide enduring public benefit, unlike a short annual event.

The government has said the benefits amount to \$200m annually from both the project and the Supercars event but it is unclear how this \$200m is calculated.

Doubt has been raised as to whether fans will want to come as the design may not excite them. Many MotoGP riders and fans have described the proposed circuit as boring, stop-start and not suited to high-speed motorcycle racing, increasing the risk of rider withdrawal or refusal. Balaton Park in Hungary saw its MotoGP round collapse after two years due to poor attendance and a stop/start circuit design.

In addition, questions have been raised about longevity of the event particularly if it does not bring the estimated financial returns or another city lures the event away from Adelaide. What might the Government offer in terms of inducements to keep the event, for example a larger or longer event or greater upfront fee?

B. ENVIRONMENTAL AND HERITAGE IMPACTS

Heritage Impacts

The Park Lands are nationally listed and have national heritage values under the Environment Protection and Biodiversity Conservation Act. The Adelaide Park Lands and City Layout have been on the National Heritage List since 2008. The Commonwealth describes them as:

“a masterwork of urban design” “the most extensive and intact nineteenth-century Park Lands in Australia.”

This occurred after the work of urbanist Jan Gehl and numerous others. It also represents a pinnacle of *contemporary* urban design and is not simply a historical curiosity.

A permanent MotoGP circuit would fundamentally alter this nationally recognised cultural landscape.

The Park Lands are also being advanced for future World Heritage nomination. Permanent motorsport infrastructure, tree removal and landscape alteration would significantly weaken the integrity and authenticity required for UNESCO assessment.

Tree Removal

Nearly three quarters of the proposed track is in the Park Lands with the net loss of Park Lands green space estimated to be 26.7 acres. Along with lost green space will be the removal of at least 377 trees which is greater than the 45 announced by the South Australian government in February 2026. The bulk of the trees would be removed between Wakefield and Bartels Road.

Trees to be removed include 42 significant trees, along with a further 335 categorised as "regulated, unregulated, invasive, dead or poor health" trees. A further 88 trees will be relocated while another 22 are "under investigation". Of the 22 trees under investigation 15 are significant trees. Many have been there for over 100 years.

The proposed tree removal could result in the loss of approximately 1300 mature trees, a significant percentage of the estimated 9,000 trees across the Park Lands when combined with the losses occurring with the North Adelaide Public Golf Course redevelopment works and the construction of the new Women's and Children's Hospital.

Proposed tree removal includes the Eastern Park Lands olive grove. The heritage olive groves are not weeds under South Australian legislation and should be regarded as significant. Not only a public amenity they are of social significance as a living link to South Australia's Mediterranean agricultural and multicultural heritage. Olive trees were introduced to the Park Lands in the mid-1800s as a source of commercial oil. Today, there are more than 1,600 olive trees across the Park Lands, according to the City of Adelaide. It has been announced that the removed trees would be replaced on a 10 to 1 basis,

however, a 10:1 planting ratio does not equate to ecological equivalence. Mature canopy is essential for shade, cooling, habitat, carbon sequestration and stormwater management at a time when Adelaide is already experiencing extreme heat. Replacement trees will take decades to replace the benefits of mature trees. The cost and delayed benefit of replacement trees using 45L and 200L plants does not in any way ameliorate the tree loss associated with this project, the full extent of which is still unknown.

Tree loss is being proposed at a time when we have a global climate crisis. There is a serious contradiction here. In 2022 the State Government declared a climate emergency which emphasised the need for increased tree canopy and urban cooling. Removing mature trees directly undermines these commitments and increases urban heat island effects. At this time government decisions should be strengthening, not reducing Adelaide's climate resilience. Concerns about climate change should be the driver of all decision making. Tree removal should not occur for an event that has an uncertain future.

C. OTHER IMPACTS

This project will result in impacts on ancient native grasslands which are part of a nationally listed threatened ecological community. These remnant Adelaide Plains grasslands cover some 7.8 acres and contain direct descendants of plants that lived here 12,000 years ago. The grasslands conservation zone is relatively new and has been improved through recent conservation work.

The government has announced that the project will result in the removal of nearly 30% of this ancient native grassland which will be replaced thereby expanding the biodiversity area by a further 180m² resulting in more native grassland habitat overall.

However, impacts of this plan for both the grasslands and for the habitat of the Chequered Copper butterfly may be extensive. This very rare butterfly managed to survive within this patch. Is it in fact realistic for grassed areas to be rehabilitated quickly between events? The butterfly habitat is extremely sensitive to noise, vibration and microclimate changes. There is also a symbiotic relationship of the Chequered Copper butterfly with the Black Tyrant Ant (*Iridomyrmex rufoniger*).

During construction and the event itself there will be impacts to cultural heritage together with impacts arising from noise, vibration, dust and night works.

Recent cultural burning practices have restored native grasslands. The project would destroy these areas and reverse years of cultural and ecological work.

Back-to-back events amplify noise, pollution, habitat disruption and access restrictions, creating prolonged environmental stress. The project will increase heat and worsen Adelaide's urban heat-island effect.

MotoGP motorcycles produce around 130 dB — twice as loud as V8s. Noise will disrupt wildlife, breeding patterns and human amenity. The noise impacts are right at the threshold of physical pain for humans. Fauna may be severely impacted. Birds may abandon nests and the foraging and breeding patterns of the nationally listed threatened Grey Headed Flying Fox may be disrupted.

However key documents which would assist the public in understanding these impacts have not been released for public scrutiny. The government has shown a lack of transparency by not releasing Environmental Impact Assessments, the Construction Environmental Management Plan and the Cultural Heritage Management Plan.

D. DISRUPTION TO IMPORTANT SOCIAL INFRASTRUCTURE

The Park Lands are an important place for cultural and personal wellbeing, public amenity and community use. The Park Lands are not just scenery but also critical social infrastructure. They provide significant benefits to community members including mental health benefits, decompression, family life and safe spaces for vulnerable people. For many the Park Lands are somewhere they can feel comfortable, safe and connected to the world. There are countless people who visit for quiet reflection, and connection with nature.

Many people use the Park Lands for running and other sporting events. A popular activity is Parkrun where hundreds of people participate every Saturday morning as walkers or runners. Other activities include cycling, commuting, dog-walking and quiet recreation. The Park Lands are one of the few places in the city where dogs can run off leash, drawing people from all over Adelaide. Several sporting clubs will be affected including the East Adelaide Football Club and the Pashtun Cricket Club. The latter has more than 20 teams playing T20 cricket every weekend and further this group have already been relocated once due to the development of the Aquatic Centre.

The South Australian government has announced that it proposes to begin project construction in December 2026, with restrictions before, during and after November 2027. The race will occur ahead of the Supercars event. The track could require around 40,000 m² of parkland green space to be converted to bitumen road. This suggests that both the MotoGP and Supercars event will need to occupy around an additional 750,000m² of parkland over 150 days to construct and deconstruct the track, and for use as grandstands, parking, concert and other facilities.

These will be extensive infrastructure works. Due to the new track alignment, the long line of constructor compounds — previously on the eastern side — will likely be shifted to the western side of the park. There will be significant fencing, compounds, closures and restricted access — far beyond typical major events. It is also unclear as to the timeframe for constructing and then dismantling the pit building after the race. There will be impacts on stormwater and power works.

This means that for several months every year as large sections of the park will be fenced off, occupied, and made unusable not for one event, but two, held only weeks apart, with months of construction and deconstruction.

There will be impacts for residents, lessees, businesses and social users. Disruption will occur at a time when the State Government is promoting higher density living in the city and its surrounds. There will be cumulative impacts from year-round infrastructure and event builds including impacts on city's street and footpath network.

Road closures will cause major traffic disruptions for thousands of people needing to access the city and /or surrounding suburbs – as well as the Park Lands themselves. It will take much longer getting to and from work and other activities. Many vehicles are likely to be displaced from closed roads and redirected to what are ordinarily much quieter streets. It will be harder to drop off and pick up children from school and childcare. School buses and public transport will also be impacted by closed or congested routes. Tertiary students could face difficulty attending compulsory classes, placements or exams due to unpredictable commute times. Families will face reduced time together.

Sporting clubs may lose access for weeks or months. A sporting ground might technically remain “open” but players, parents, coaches and volunteers might not be able to get there. Training and competition at community clubs could be disrupted for weeks. Access to

hospitals and other medical facilities will be impacted, such as specialist rooms, St Andrews Hospital on South Terrace, and Calvary Adelaide Hospital in Angas Street. Community members may have difficulty attending hospital appointments, medical treatments or specialist appointments and must factor in additional travel time together with time to park and walk. There will be pressure on the Royal Adelaide Hospital due to use of the proximate burns unit which is a requirement for the MotoGP event. Emergency services such as ambulances could be impacted during peak congestion if they must move through roads carrying traffic displaced by closures.

CONCLUSION

The location of the project in the Park Lands is environmentally damaging, heritage-eroding, fiscally unsound and democratically compromised. The Bend Motorsport Park offers a safer, more sustainable, more economically rational alternative that avoids environmental destruction and community disruption. This alternative location will help to ensure the Park Lands as a legacy for future generations.

Please feel free to contact APA Committee Member Melissa Ballantyne on 0431 398 452 or ballantynem180@gmail.com with any questions or to request further information.

Sincerely,

Mat Monti
President
Adelaide Park Lands Association