



8th April 2026

Ms Pothida Youhorn
Committee Secretary
Foreign Affairs, Defence and Trade References Committee
Parliament of Australia

Via email: Fadt.Sen@apn.gov.au

Dear Ms Youhorn,

Submission – Inquiry into Management of Defence estate assets

I am writing on behalf of National Trust of South Australia (NTSA) in response to your invitation to make a submission to the Inquiry into Management of Defence estate assets. The NTSA's Cultural Heritage Advisory Committee (CHAC) discussed the matter at its meeting held on Wednesday 8 April 2026 and makes its submission with particular reference to:

- e. the heritage significance of Defence estate assets and the adequacy of measures to protect that significance during and following divestment, including the impact on veteran and community connections to sites of military service;
 - f. the Defence estate audit, including its planning, conduct and the potential of the period between its completion and public release to have degraded validity of the audit's findings;
 - g. consideration of an amended policy framework for the use of surplus Defence land that prioritises alternative public uses over private development
- e the heritage significance of Defence estate assets and the adequacy of measures to protect that significance during and following divestment, including the impact on veteran and community connections to sites of military service;**

In relation to the heritage significance of defence estate assets, The National Trust of SA supports a full heritage assessment against ICOMOS criteria of each affected site including buildings, open spaces, trees and other aspects so that items and particular elements are then listed and protected under State or National Heritage legislation.



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In addition to heritage listing, protection should be provided through contractual conditions and appropriate title encumbrances applied at the time of the transfer of the assets.

The four sites (Edinburgh Parks (partial divestment), Hampstead Barracks, Warradale Barracks (Reserves training to remain) and Woodside Barracks) currently affected in South Australia will each have differing elements of heritage significance. We therefore submit that each should be assessed on its own merits. This approach should be applied across all Defence estate asset divestment throughout Australia.

The heritage of the Defence estate assets is relevant to the broader community, to veterans, to members of the Defence Forces and their relatives as well as those who have worked on the particular sites.

Open spaces like parade grounds are often significant elements of Defence sites. The Torrens Parade Ground in Adelaide is a good example. In addition to individual buildings and groups of buildings, the open spaces should be assessed for their heritage value.

The trees and landscape elements of the sites should also be assessed for potential heritage significance and importance to the communities listed above.

f. the Defence estate audit, including its planning, conduct and the potential of the period between its completion and public release to have degraded validity of the audit's findings;

The full assessment of the heritage value of sites is not likely to degrade in validity over the period if it is conducted before any changes to the site are undertaken. The sites should not be altered before such an assessment takes place.

g. consideration of an amended policy framework for the use of surplus Defence land that prioritises alternative public uses over private development

The National Trust of SA supports an amendment to the policy framework that would prioritise alternative public uses over exclusive private development.

This submission to the Inquiry is informed by recent events including the South Australian Land Swap in which the Keswick Barracks were transferred to the South Australian Government. The National Trust of South Australia is concerned that we are not aware that a full heritage assessment of that site was carried out or that all



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buildings, groups of buildings, the site's relationship to the rail corridor access, open spaces and trees were assessed.

The site has been progressively developed since the construction of Building 32 and the Royal Australian Field Artillery Barracks in 1912. Other significant buildings on the site include:

- The Keswick Hospital (No.7 Australian General Hospital) built in 1915 to treat soldiers returning from the Gallipoli campaign. It remained in use until 1946. The Keswick Hospital demonstrates important aspects of the history of military and repatriation medicine in South Australia.
- The detention barracks along Keswick Creek on the southern edge of the site. This was the principal detention barracks for soldiers convicted of serious military offences during the Second World War. It is believed to be the only existing Second World War military detention barracks in the state.

However, only Building 32 is specified in the state heritage listing. The National Trust of South Australia is not aware of any other significant features of the site – buildings, open space or landscaping - that have been put forward for listing recently. This leaves the Keswick Barracks site vulnerable to development that detracts from and diminishes its significance.

In another South Australian area, the extensive private residential development around the Fort Largs Barracks and Drill Hall (a former Defence property) appears to be adversely affecting the heritage significance of those buildings.

The National Trust of SA submits that the heritage of any Defence estate assets should be assessed and protected by appropriate Federal or State statutory mechanisms before any divestment takes place.

Yours sincerely,

Nicolette Di Lernia
Chief Executive Officer
National Trust of South Australia