

# INQUIRY INTO HERITAGE

Submission

**ENVIRONMENT, RESOURCES AND  
DEVELOPMENT COMMITTEE**

14 September 2018



CITY OF  
ADELAIDE

## DOCUMENT PROPERTIES

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The City of Adelaide acknowledges the traditional country of the Kaurna people of the Adelaide Plains and pays respect to Elders past and present. We recognise and respect their cultural heritage, beliefs and relationship with the land. We acknowledge that they are of continuing importance to the Kaurna people living today.



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## EXECUTIVE SUMMARY

The City of Adelaide welcomes the Committee's initiation of this Inquiry and considers the timing to be opportune given the current reform of the State's planning and development system.

Built heritage contributes economically, culturally, historically, aesthetically and environmentally to the City and the State.

This submission has been informed by a long-term commitment of successive City Councils who have worked with owners, peak bodies, government and the city community to protect, preserve, celebrate and promote the City's heritage.

SA has a proud history of acknowledging the cultural, social and architectural value of heritage.

Council seeks a future heritage system that:

- Enables the full economic, tourism, cultural, community and sustainability value of our built heritage to be realised.
- Provides for consistent and transparent decision making based on merit and that meets community expectations.
- Enables the appropriate conservation, adaptation, sensitive re-use and development of heritage assets.

To fulfil these outcomes, Council seeks a single integrated system for the identification of heritage places. This would replace the current separation of State and Local heritage listing processes which results in two authorities, two administrative systems and two sets of differing processes.

Such an approach will provide the best platform for effective reform to enable consistency of approach, enhance opportunities for streamlining and administrative efficiencies.

## 1. INTRODUCTION

Council acknowledges that the South Australian Parliament's Environment, Resources and Development Committee (ERDC) resolved at its meeting on 30 June 2018 to conduct an Inquiry into the operation of the Heritage System in South Australia.

In conducting this Inquiry, we understand that the ERDC will investigate and report on the existing arrangements and desirable reforms for local, state and national heritage listings.

Council supports the need for this Inquiry and considers its timing to be opportune. We expect that it will influence the built heritage agenda in South Australia's new planning system.

### **Terms of Reference**

*That the Committee investigate and report on the existing arrangements and desirable reforms for local, state and national heritage listings, with reference to collaborating and supporting the best outcomes for SA.*

1. *Highlighting the differences in, and consistency of, processes and criteria between listing and assessing local, state and national heritage;*
2. *How heritage should be managed in the future; including, but not limited to investigating:*
  - a. *How should the process for listings (from initiation to final placement on the appropriate register) be managed, and by whom;*
  - b. *Who should have the right to be heard in relation to listings;*
  - c. *Who should be the decision maker for listings and review; and*
  - d. *What processes should be in place for the review of listings;*
3. *What is the relationship and distinction between 'character' and 'heritage';*
4. *Have there been unexpected or perverse outcomes; and*
5. *Any other relevant matter.*

## 2. THE VALUE OF HERITAGE

Built heritage contributes economically, culturally, historically, aesthetically and environmentally to the City.

**The City of Adelaide's identity is bound up with the Kaurna people, Light's Plan of 1836, and the buildings that remain today.** These inform our society's cultural identity<sup>1</sup> and establish a sense of belonging and community identity.

**Light's Plan of 1836 forms a basis for marketing Adelaide locally, nationally, and internationally.** Council recently adopted 'Adelaide – Designed for Life' as the marketing platform for its City brand. This brand positions the City in a unique way, in the highly competitive national and international environments.

In 2017, Council commissioned a study<sup>2</sup> estimating the economic impact of built heritage on the City. Conducting this study was part of marking 30 years of the Heritage Incentives Scheme. The study concluded **that every \$1 spent conserving heritage fabric generates a \$1.68 return within the SA economy**, a return that economists view as a good return.

Council's Heritage Incentives Scheme (HIS) indirectly **boosts gross state product by an estimated \$395M annually, supporting some 3,000 jobs**<sup>2</sup>. This is premised on the HIS playing a vital role in retaining the asset base underpinning Adelaide's significant exports in heritage/cultural tourism.

The HIS **directly creates local value added and employment** by diverting some household savings from imports to local construction projects. This impact is estimated<sup>2</sup> to be approximately \$8M for the 2006-2017 period, equating to an average of \$730,000 per annum. **Overseas studies<sup>3</sup> affirm that new construction generates fewer jobs than the same level of expenditure on rehabilitation of a historic buildings.**

Around 200 development applications are received for heritage listed buildings each year. Annually, one in every ten heritage listed buildings has development approved to be undertaken. Since 2010, the total annual value of development applications on heritage sites has varied between \$50M and \$300M.

In 2015, Council commissioned a study<sup>4</sup> to address an information gap in relation to the tourism benefits of the City's cultural heritage. For the study, cultural heritage encompassed all the historic buildings and streetscapes as well as cultural institutions. **It identified that based on the results of a survey of visitors, the upper bound value of annual direct tourist expenditure attributable to cultural heritage places was estimated to be in the order of \$375M per annum within the City of Adelaide.** The value of annual direct tourist expenditure that would be lost if the heritage tourism places in the City did not exist is estimated to be in the order of \$111 million.

***"I've worked in 50 countries and I don't think I've been in a city where there was a bigger gap between the high quality and quantity of heritage, and the less effective use of it. That's not a criticism, it's an identification of a huge upside in opportunity"***<sup>5</sup>  
Donovan Rypkema, Principal, Place Economics and Heritage Strategies International,

<sup>1</sup> *Cultural Strategy 2017–2023* (City of Adelaide, 2017), p3

<sup>2</sup> *The Economic Value of Built Heritage in the City of Adelaide* (SGS Economics & Planning, 2017), pIV, p24

<sup>3</sup> *Submission to Local Heritage Discussion Paper* (City of Adelaide, 2016), p16

<sup>4</sup> *Economic Value of Heritage Tourism – Adelaide* (City of Adelaide, 2015), p11

<sup>5</sup> *The City Messenger* (By Donovan Rypkema, in Adelaide, May 2018)

Washington DC speaking about Adelaide as part of the History Festival 2018. Mr Rypkema also presented on the 'Economic Value of Heritage to Cities'<sup>6</sup>. Mr Rypkema's visit was auspiced by the National Trust SA, History Trust SA and the City of Adelaide.

Built heritage is sustainable, with international research<sup>7</sup> identifying **that older buildings are more operationally carbon efficient when compared to newer construction**. Local research affirms the carbon capture value of established built heritage.

Many people engage with built heritage. Established in 2004 as History Week, History Festival has become a month-long celebration of SA's history. Held in May each year, in 2018, the History Festival had 139,000 visits to 666 events presented by 374 different event organisers. The Council's history festival posts had 345,000 total impressions across social media. The 2018 Festival was the biggest ever, with an 11% increase on 2017. Council is a key partner with History SA in fostering this Festival.

<sup>6</sup> Donovan Rypkema at the *Heritage Community Forum "Economic value of Heritage to our cities"* (City of Adelaide, History Trust of SA and National Trust SA, 2018)  
<https://www.facebook.com/HistoryFestival/videos/10160231254830065/>

<sup>7</sup> *Submission to Local Heritage Discussion Paper*, p16

### 3. COUNCIL'S LEGACY IN HERITAGE PROTECTION

In 1981, Council commenced a comprehensive approach to built heritage management in the City. The idea emanated from (former) Lord Mayor Jim Bowen, who was keen to gain an understanding of the community's expectations regarding which places in the City should be protected, and by inference, provide developers with some certainty regarding potential development sites.

At the time, the context for this decision had been the subject of fierce debate that had surrounded the demolition or threatened demolition of some of the City's landmark buildings resulting in the establishment of the *South Australian Heritage Act 1978* (SA) and Register.

The Register of State Heritage Places had been established in 1978 and was steadily growing in numbers of places that were protected with statutory protection.

In 1981, the Council employed a team of consultants (Donovan Marsden Stark) to conduct a heritage study; *the City of Adelaide Heritage Study*.

The study comprised:

- A list of heritage places that should be protected
- A study to address the economic aspects of heritage listing
- A program of heritage interpretation.

In short, the aims were to protect, preserve and promote the City's heritage.

Successive City Councils have worked with owners, peak bodies, the wider community and other spheres of government to conserve, protect and promote the value of the City's heritage.

In the 1990s, Council supported the possible national heritage listing of the Adelaide Park Lands and City Layout. In 2008, these were recognised for their heritage value to Australia, being placed on the National Heritage list established under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth).

In 2016, Council adopted a Position on Heritage Reform<sup>8</sup> as part of the review of the SA planning system. That position has formed the basis of this submission.

In 2017, Council's Heritage Incentives Scheme (HIS)<sup>9</sup> celebrated 30 Years of partnering with owners of heritage listed places. This Scheme was awarded a national commendation by the Planning Institute of Australia<sup>10</sup>. Council has invested approximately \$20M over its 30 year history into conservation works, with these contributions matched by building owners.

In 2018, the City has 2,497 heritage listed places<sup>11</sup>. These constitute 27% of all heritage listed places in SA. These are the outcome of listing criteria and processes by three spheres of government over the last 40 years. Each listing was justified by the criteria, processes and consultation in statutory effect at the time. Legislation has changed over that time.

Protecting heritage and enabling population growth are not mutually exclusive. The City of Adelaide has much of its built heritage listed as well as significant capacity for population growth<sup>12</sup>.

<sup>8</sup> *Position on Heritage Reform* (City of Adelaide, 2016)

<sup>9</sup> *Heritage Incentives Scheme* (City of Adelaide website, 2018), [www.cityofadelaide.com.au/your-council/funding/heritage-incentive-schemes-his](http://www.cityofadelaide.com.au/your-council/funding/heritage-incentive-schemes-his)

<sup>10</sup> *30 Years of Built Heritage Management – Nomination for Planning Institute of Australia Award* (City of Adelaide, 2017)

<sup>11</sup> *Heritage Listings* (City of Adelaide website, 2018), [www.cityofadelaide.com.au/planning-development/city-heritage/heritage-listings/](http://www.cityofadelaide.com.au/planning-development/city-heritage/heritage-listings/)

<sup>12</sup> *Spatial Vision for the Future of the City* (City of Adelaide, 2014), p23



## 4. RESPONSE TO THE COMMITTEE'S TERMS OF REFERENCE

The Terms of Reference are to investigate and report on the existing arrangements and desirable reforms for local, state and national heritage listings.

### 1. *Highlighting the differences in, and consistency of, processes and criteria between listing and assessing Local, State and National Heritage*

#### 1a. *Process and Criteria*

In 2018, the following SA Government and Commonwealth Government legislation provides the statutory framework for identification of heritage 'value' and how that value is 'managed':

- *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC)
- *Heritage Places Act 1993* (SA)
- *Development Act 1993* (SA) / *Planning, Development and Infrastructure Act 2016* (SA)

**It is important to recognise that the heritage value represented by different places represents heritage value within historical contexts. All levels of heritage are important, but in different ways.**



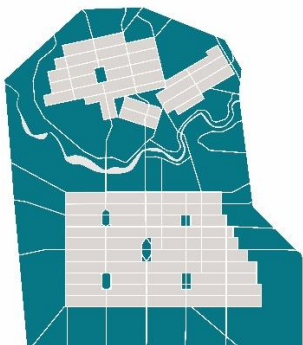
#### Places of Heritage Value Nationally

The Park Lands and City Layout are on the National Heritage list, as are old and new Parliament Houses, the Adelaide GPO and also the North Adelaide GPO



#### Places of Heritage Value to South Australia

Given settlement pattern of SA, many places of heritage value to SA are also of heritage value to the City. Both Parliament Houses and both GPOs are on the State Heritage list and whilst not 'local heritage listed', would've been important in the life of the City.

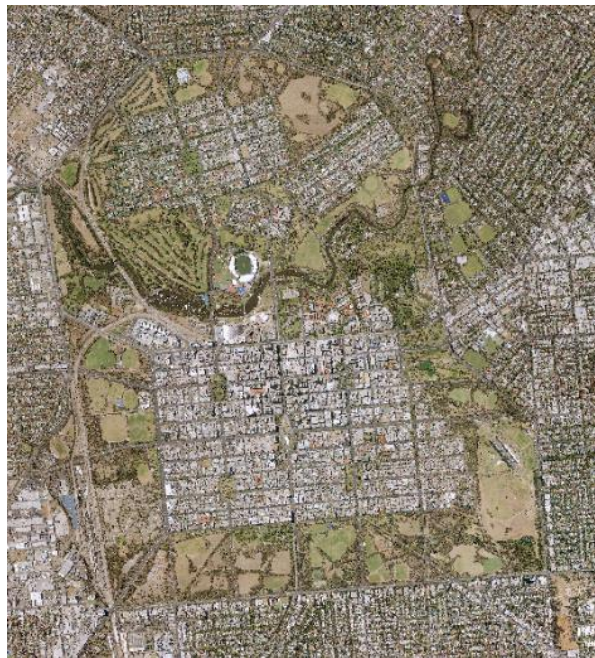


#### Places of Heritage Value to the City

Given settlement pattern of SA and within the City itself, many places are of heritage value within the City and parts of the City. This could be called a local context.

An example of heritage value in different contexts is the Adelaide Park Lands.

- The Park Lands are part of the national heritage value under the Commonwealth EPBC Act, triggering referral for certain works that might impact that value.
- The Park Lands were assessed in 2017 for their state heritage value under the *SA Heritage Places Act 1993* (SA). This assessment has yet to be formally considered and decided by the SA Heritage Council
- Individual buildings and structures, such as statues and bridges, are listed as either State Heritage Places or Local heritage places.



This heritage status has informed the Adelaide Park Lands Strategy prepared by the Adelaide Park Lands Authority, a statutory authority established under the *Adelaide Park Lands Act 2005* (SA). This also informs Community Land Management Plans prepared by the City of Adelaide under the *Local Government Act 1999* (SA).

At the SA Government level, the Minister for Heritage, SA Heritage Council and Department of Environment and Water administer the *Heritage Places Act 1993* (SA). The Minister for Planning, SA Planning Commission, and Department of Planning, Transport and Infrastructure administer the *Development Act 1993* (SA) and its transition to the *Planning, Development and Infrastructure Act 2016* (SA).

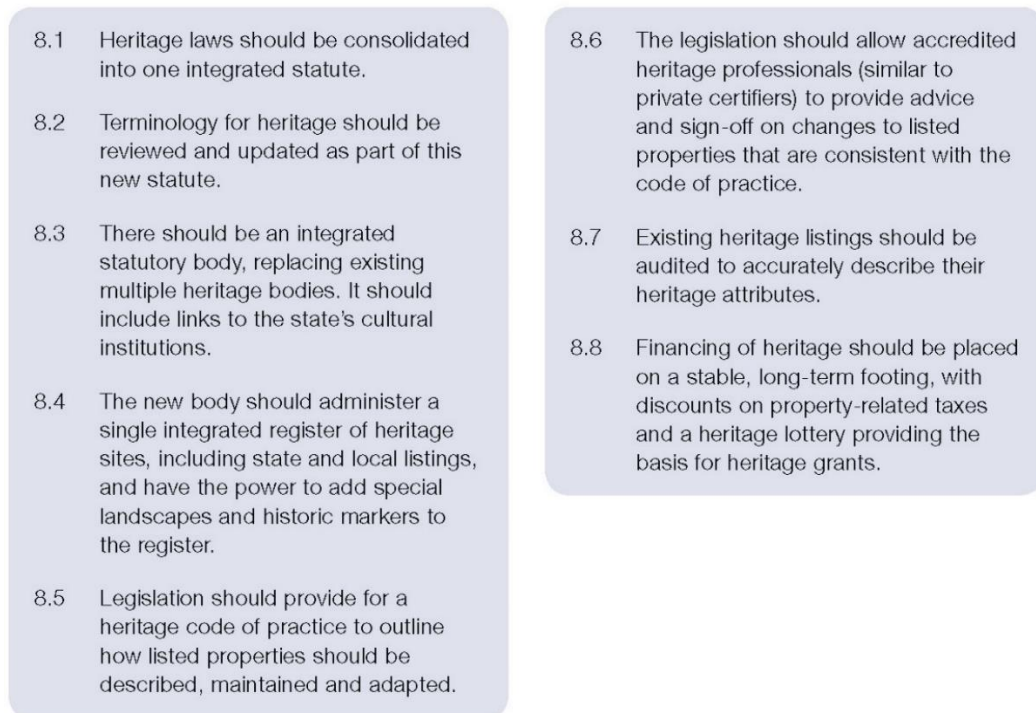
In 2013, Council prepared a Discussion Paper<sup>13</sup> as part of its participation in the review by the Expert Panel for Planning Reform. Sections 3.4.1, 3.4.2, 3.4.5 and 3.5 summarise the processes and criteria for the different tiers of national, state and local heritage.

In 2013, the observation was that the State heritage listing process is simpler in comparison to the process for local heritage listing involving the Development Plan Amendment process under the *Development Act 1993* (SA). This has been Council's experience subsequently and has informed Council's position of 2016<sup>14</sup> for a single integrated system for the identification of heritage places.

<sup>13</sup> *Research and Observation Paper: Historic Heritage and Character* (City of Adelaide, 2013), p11, p12, p17, p20

<sup>14</sup> *Position on Heritage Reform*

Council's position seeking a single integrated system has also been informed by South Australia's Expert Panel for Planning Reform<sup>15</sup> recommendations (refer Figure 1), as well as the former Government's support<sup>16</sup> in 2015.



**Figure 1** REFORM – Place Heritage on Renewed Foundations extract

Council's 2016 submission<sup>17</sup> to the Local Heritage Discussion Paper was that a review of criteria should not raise the threshold for statutory recognition. Raising the threshold for recognition would erode the statutory basis of current properties that are listed. Council's 2016 submission contained a minimum position in relation to heritage.

### ***Minimum Heritage Position***

*Any changes in relation to arrangements for the listing of State or local heritage places and areas should:*

- *not involve any changes to the existing listing criteria for State or local items which would make it more difficult to obtain listing and protection of the State's valued heritage whether of State or local significance;*
- *permit the listing of local character items and areas to reflect the importance which local character items and areas have to local communities, the broader community and tourists;*
- *not result in the delisting of any existing item of State or local heritage; and*
- *not change or diminish the central role which Council's and their elected members have in relation to the listing of local heritage items or areas or local character items or areas.*

<sup>15</sup> *The Planning System We Want on Planning Reform* (South Australia's Expert Panel, 2014), p64

<sup>16</sup> *Transforming our Planning System: Response of the South Australian Government to the final report and recommendations of the Expert Panel on Planning Reform* (Government of South Australia, 2015), p20

<sup>17</sup> *Submission to Local Heritage Discussion Paper*

**The criteria and process for identification of heritage value should sit within the *Heritage Places Act 1999* (SA). Local heritage criteria in the *Development Act 1993* (SA) needs review along with the contemporary guidelines being created. In considering updating criteria, Council affirms its minimum heritage position.**

#### **1b. Local Heritage Processes with Anomalies**

Council's experience as a proponent of places for local heritage designation is characterised by incomplete and anomalous listing processes. 'Shifting goal posts' is the short hand term.

This experience is in marked contrast to the experience of nominating buildings for State heritage designation, where such proposals are considered and finalised with limited fuss.

Over the last 12 years, statutory processes for considering buildings of possible local heritage value for local heritage designation have been characterised by deviating from what is standard, normal, or expected. This is the definition of anomaly.

The Minister and Council have negotiated, with Council having the experience of accepting an outcome for reasons other than a professional review through a due and transparent process of a heritage listing proposal regarding the *Development Act 1993* (SA) criteria.

The Chronology of Local Heritage Listing Processes in the City of Adelaide 2004–2018 (refer to **Attachment A**) summarises the various processes and Council's experience.

Prudent use of public funds can't be ignored. As one example, the 2008 heritage survey and listing proposal was commenced with a formal Council/Minister for Planning agreement. In good faith Council expended \$0.5M on consultants plus significant administrative resources.

Of the 430 buildings identified by independent consultants in 2008, in 2018, 63% of the proposals have not been properly considered for local heritage designation, with goal posts shifting through the process. These places – as well as those in the Park Lands – remain at risk of inappropriate change, possible demolition. These proposals – being around 310 properties – need to be formally considered through a proper process.

DPA processes are administered by the SA Planning Commission/DPTI, with heritage expertise that is limited, and that has varied overtime. The establishment of the Local Heritage Advisory Committee equivalent in recent times had no terms of reference or clarity as to how current members were selected.

**Council's experience has been of changing processes between different DPAs in application of local heritage criteria in the *Development Act 1993* (SA). This has involved moving goal posts midway through an agreed DPA process, a transparency deficit regarding no access to the information being provided to the body making the decision, and of variable and limited heritage expertise at the State planning level.**



### **1c. Out of Date Local Heritage Listing Criteria and Guidelines**

The *Development Act 1993* (SA) introduced the ability for buildings and places to be assessed for their local heritage value in relation to the criteria in S23 of the *Development Act 1993* (SA). If determined to be of value regarding at least one of the criteria, such places could be local heritage listed and changes to them managed through the planning system.

The criteria introduced in 1993 have been in place for 25 years and are not consistent with national guidelines. Overtime, particularly in recent years, the application of local heritage criteria has suffered from insufficient guidance. For example, the Planning SA Heritage Bulletin of 2001 produced by the then Planning SA had no formal role, has not been updated and is largely irrelevant.

The following needs addressing:

- Historic Themes – Assessing buildings for their heritage value involves assessing how a building is important historically. Historians refer to important historical themes, for example, the residential growth of the City in the latter 19th century is one theme. When assessing a building for its heritage value, an assessment needs to be made regarding its importance in representing historical themes. Noting the City of Adelaide contains 27% of all listed buildings in SA, an assessment of the heritage value of a proposed individual listing can be made with regards to the heritage value represented by other already listed buildings which represent those themes.
- Our observation of more recent practice by the State has been a 'Noah's Ark' approach to not support a proposed individual listing, on the basis that enough other buildings already represent those themes. The current system lacks guidelines on this topic.
- Alterations – Buildings being assessed for heritage value in 2018 have invariably had alterations. These alterations mean a building can be close to, or far, from original. How to consider alterations in the consideration of a building's heritage value, and therefore, prospects for being listed, needs consideration in terms of criteria and guidelines. This includes superficial and reversible physical changes that potentially preclude the heritage listing of buildings.
- Physical Fabric – The identification of heritage value identifies 'what' is the physical fabric of the heritage place. Greater guidance is needed on how that identification influences the 'policy' description of 'heritage' value in the planning system.
- There also needs to be more protection for the interiors of local heritage places and rear of local heritage places where applicable.

**The local heritage criteria in the *Development Act 1993* (SA) need updating and contemporary guidelines created. In considering updating listing criteria, Council affirms its minimum heritage position.**

**2 How heritage should be managed in the future; including, but not limited to investigating:**

**2a. How should the process for listings (from initiation to final placement on the appropriate register) be managed, and by whom**

Council has been and continues to be an active participant in the process of reform of the SA Planning System. Council has prepared various papers and submissions to the Expert Panel for Planning Reform and SA Government.

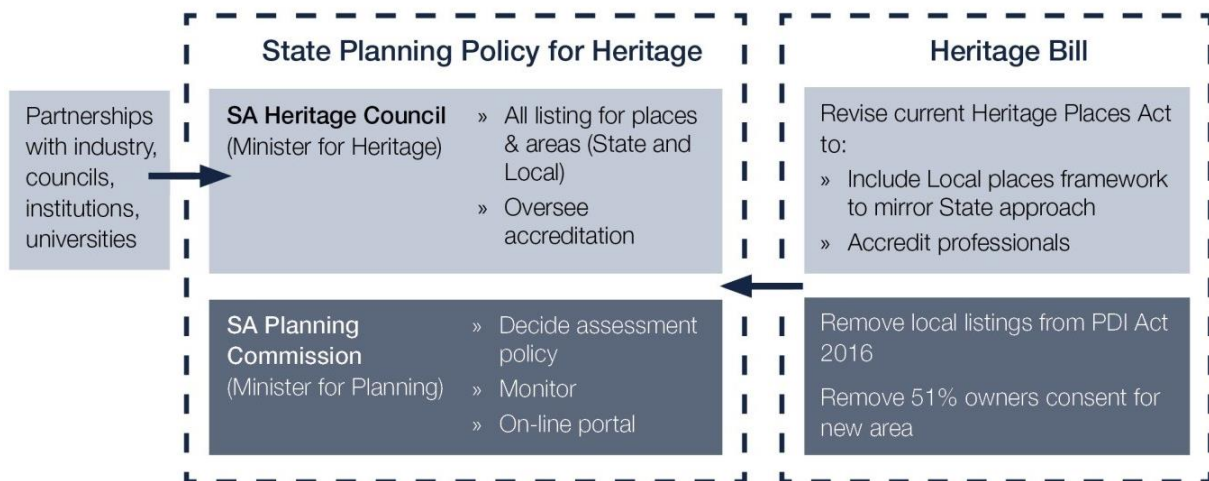
During this time, Council's approach and submissions regarding Council's experience, challenges observed and suggested solutions – be they legislative, policy, or practice – have been informed by planning system guiding principles<sup>18</sup>. The intent of the principles are to act as a yardstick for Council's approach and submissions to detailed reform proposals.

Drawing on Council's heritage reform position<sup>19</sup> and informed by the planning system guiding principles, Council seeks a heritage system that:

- Enables the full economic, tourism, cultural, community and sustainability value of our built heritage to be considered and realised.
- Provides for consistent and transparent decision making based on merit and that meets community expectations.
- Enables the appropriate conservation, adaptation, sensitive re-use and development of heritage assets.

Council's ideal system is illustrated in **Figure 2**, Framework for Heritage Management in SA.

*Integrated — Transparent — Community Value — Certain — Enabling — Consistent*



**Figure 2 Framework for Heritage Management in SA**

<sup>18</sup> *Planning System Guiding Principles*, (City of Adelaide, 2017)

<sup>19</sup> *Position on Heritage Reform*

This ideal system would comprise:

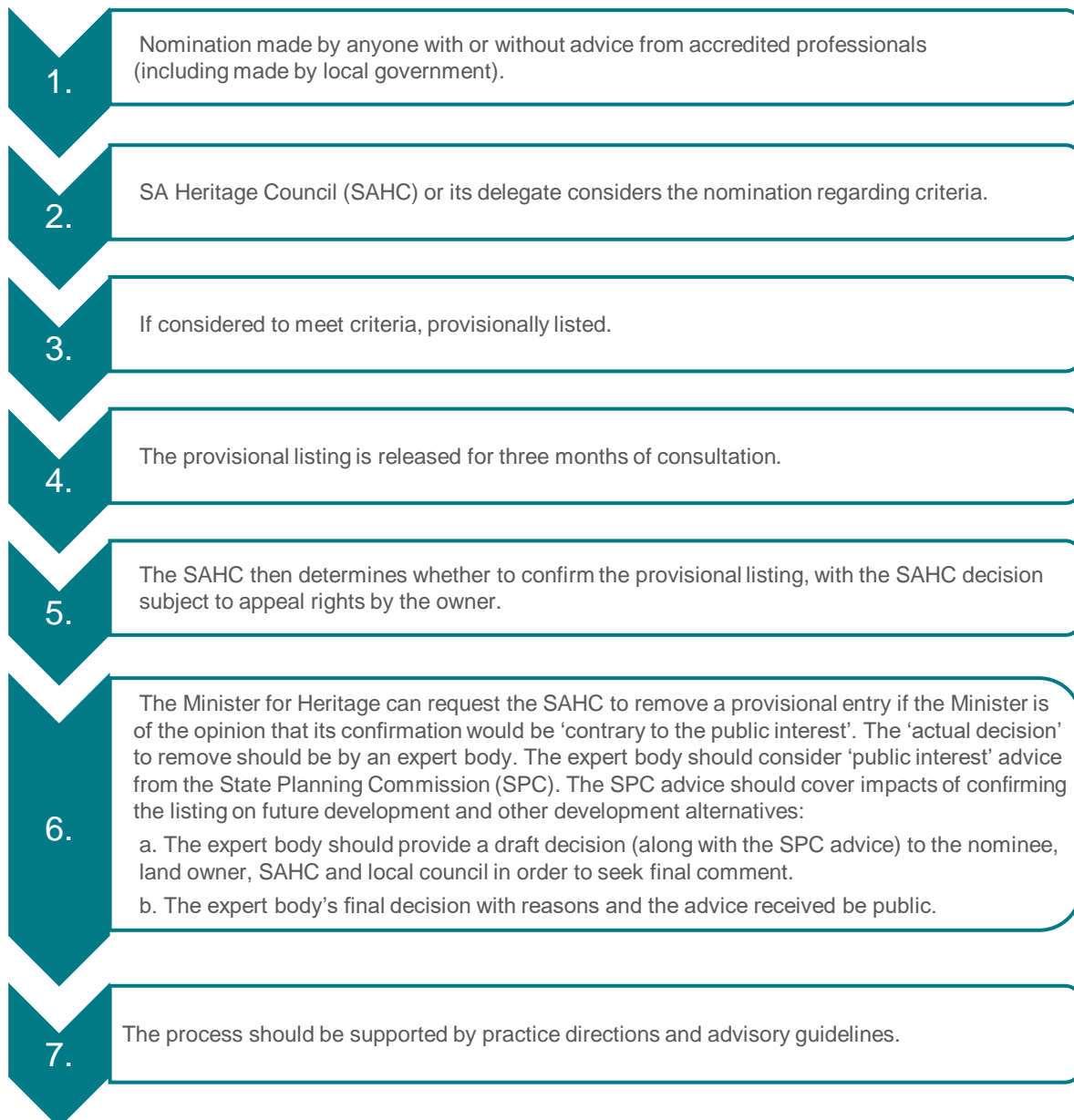
- A single authority for heritage listing and a separate authority for heritage management.
- Merging of the local heritage listing and identification of historic conservation zone/areas into the existing state heritage listing processes. This merging can be enabled through adjustments to the current *Heritage Places Act 1993* (SA) and removal of local heritage listing criteria from the *Planning, Development and Infrastructure Act 2016* (SA).
- A new State Planning Policy under the PDI Act for heritage and character to provide high level guidance for heritage management.
- Determination of policy and development applications regarding heritage places and areas by planning authorities under the PDI Act. The heritage authority should provide input into policy development as well as development applications.
- Accreditation of heritage professionals by a single heritage authority.
- A partnership approach with government, industry, universities and cultural institutions to support the identification, understanding, measuring, celebrating and synergising of the acknowledged value of heritage. Education of the community, professions and specialist trades is part of this. Head powers already exist for the SA Heritage Council in the *Heritage Places Act 1993* (SA). Council is prepared to partner in this.

The SA Planning Commission role would be in high level policy and 'management' of built heritage places and areas.

This ideal system meets the recommendations of the Expert Panel on Planning Reform and can be achieved through amendments to existing legislation.

Draft State Planning Policies are under preparation by the SA Planning Commission, including a policy on adaptive reuse and cultural heritage Council has made a separate submission on the draft State Planning Policies seeking various changes.

Council's preferred listing process is illustrated overleaf (**Figure 3**).



**Figure 3 Preferred Listing Process**

It is acknowledged that the current State listing process provides a 'public interest' test, exercised in recent years regarding, for example, Maughan Church and Union Hall. If a public interest test is to continue, it is Council's position that the:

- legislative test be reviewed to be weighed as high as possible; and
- decision-making body to 'weigh' the public interest has a range of expertise in weighing 'development and heritage'. A political role is not supported.

To support strengthening exercise of 'public interest', Council proposes the:

- Decision maker receives advice from the State Planning Commission (SPC) around 'public interest'. The intent would be that the SPC's expert planning advice would cover economic, social, cultural and environmental themes, as well as alternatives. As a decision to not confirm a provisional listing is invariably associated with a 'development', it makes sense that such advice be considered.



- Decision maker's draft decision with reasons be provided to the nominee, owner, SA Heritage Council, and local council to enable comment within defined times.
- Final decision with reasons be made public.
- Above process steps be transparent.

It is acknowledged that community awareness and attention will likely be high but a process needs to be established that enables open consideration.

**Council seeks a single system for the identification of which buildings, places and areas are of heritage value.**

**This single system would replace the current separation of State and Local heritage listing processes which results in two authorities, two administrative systems and two sets of differing processes.**

**Such an approach provides the best platform for effective reform to enable consistency of approach and administrative efficiencies.**

## ***2b. Who should have the right to be heard in relation to listings***

As a principle of natural justice, heritage listing processes should enable anyone with an interest in 'listings' to be heard. Typically, interested people involve the owner of the property (or representatives for the owner), historians, heritage architects, local government and interest groups, be it National Trust SA, Property Council SA, Urban Development Institute of Australia (SA) or the International Council on Monuments and Sites.

Council's 2016 position<sup>20</sup> is also that it seeks the removal of the requirement that 51% of owners agree to a proposed heritage character or preservation zone or sub zone (as provided in section 64(4) and (5) of the PDI Act 2016. Council affirms that it is the 51% requirement that is the issue, not the intent for significant engagement and support for the introduction of a policy seeking the 'conservation' of the historic character of a suburb or part of a suburb.

**Anyone should have the right to be heard in relation to listings. This includes the owner of the land, and any interested parties, organisations or individuals.**

## ***2c. Who should be the decision maker for listings and review***

Council's position is that a single heritage authority should be responsible for listings and review.

<sup>20</sup> *Position on Heritage Reform*, p7

## 2d. What processes should be in place for the review of listings

### Owner Initiated Review

Over the last 10 years, following consideration of owners input and the particular circumstances, Council has reviewed the local heritage designation of three properties and recommended to the Minister for Planning to remove the local heritage designation.

The local heritage designation removal of the dwellings at 27 Vincent Place and 136-137 MacKinnon Parade were agreed (in separate DPAs) following the preparation, consultation, and consideration of an amendment to the Development Plan (a process with considerable resources). The local heritage designation of 40 Margaret Street was removed as the circumstances of its listing justified utilising the correction of error authority in S29 of the *Development Act 1993* (SA).

**As a matter of natural justice, owners of buildings that are heritage listed should have the right to ask the heritage authority to review the listing. This means the authority considers the circumstances – including any new information – around whether there is a case for removal or variation of the heritage listing. A review does not automatically mean the authority removes or varies the listing.**

### Council Initiated Review

In light of the current protections for listings in the City, Council is cautious about the potential impact of revised criteria on existing listings and any whole sale review. This is based on:

- Existing heritage listed places<sup>21</sup> having been bought and sold in the knowledge of the heritage designation.
- Many listed places have been the recipient of public funds through Council's Heritage Incentives Scheme as well as State Government funding.

With planning reform to replace Development Plans with a single Planning and Design Code, Council acknowledges the undertaking by the former Minister for Planning (Rau) to 'grandfather' across all existing heritage listings – both State and Local – from the Development Plan to the Planning and Design Code. This undertaking was in the House of Assembly on 28 October 2015 *"... the intention is, yes. I think I also mentioned that with respect to heritage we have only just lightly touched here because it is a topic all of itself. But the intention is that, in effect, if you are a heritage place now, once the transitional arrangements are finished you will continue to be a heritage place."*

Accurate and up to date identifiers of what is the listing and where it is located is critical for good customer service and effective public administration. A scope of review around this is appropriate and means there should be an easy process for a heritage authority to undertake this updating of listing identifiers. The heritage authority should delegate this updating to effectively determine whether an update is straightforward or has unintended legal or heritage value consequences.

<sup>21</sup> *Heritage Listings*

**The updating and correction of heritage listing identifiers, such as address or land identification details, should be an administrative task delegated to an appropriate level.**

### **3. What is the relationship and distinction between ‘character’ and ‘heritage’**

The *Planning Reform Issues Paper: Heritage & Character*<sup>22</sup> prepared for the LGA SA states:

*“The terms ‘heritage’ and ‘character’, are regularly confused and intertwined but have distinct meanings:*

- *‘Character’ – All areas have a character that can be analysed and described. Character is a value neutral concept that captures the interrelationship between built form, vegetation and topography in the public and private domains that distinguishes one place from another. The concept of character is broader than just architectural style or the era of development. It is also about recognising the distinctive characteristics or urban forms and their relationship to topography, vegetation and other natural features (i.e. the buildings and the spaces and features around them and how they relate to each other).*
- *‘Heritage’ – Heritage on the other hand has an established international frame of reference (ICOMOS / Burra Charter) and is about how a place represents history and evolution of an area and its people or activities that have taken place. Heritage and cultural significance is embodied in the fabric and setting of the place.”*

SA’s situation of heritage and character is an outcome of successive legislative frameworks. In the 1970’s, State Heritage places were initially allowed to be identified, followed in 1994 by Local Heritage Places, and then Historic (Conservation) Zones. In parallel, from the 1970s, Council lead planning practice in SA by establishing ‘desired future character’ statements for all spatial areas of the City. This included spatial areas where a new character was envisaged as well as spatial areas where the existing character – often historic built form in nature - was valued and was sought to be maintained by new ‘development’.

The current *Adelaide (City) Development Plan* contains a North Adelaide Historic (Conservation) Zone and an Adelaide Historic (Conservation) Zone. Each of these zones comprises a high proportion of buildings that are Heritage Places. These zones do not contain ‘contributory places’. A *Development Plan* Amendment to establish area-based policy for historic conservation in southern parts of the City remains undecided. *Development Plans* in other councils contain area based historic conservation policy (some of which contain ‘contributory places’) as well as what are called Residential ‘Character’ zones.

In 2017, Council’s submission to the draft update to the *30 Year Plan for Greater Adelaide* sought terminology clarity around historic character and heritage. The 30 Year Plan is the lead strategy for the development of Greater Adelaide, including, areas of historic character that are planned to continue that way with limited change. The 30 Year Plan was not amended to provide terminology clarity.

<sup>22</sup> *Planning Reform Issues Paper: Heritage & Character* (Jensen PLUS, formerly Planning + Design, 2014), p8, p9

**The problem with the current situation around ‘heritage’ and ‘character’ is lack of criteria to identify what is ‘character’, part of which involves considering the role of ‘heritage places’ within that ‘character’. Current practice involves historic areas being identified either as a ‘character area’ or a ‘conservation area’. Criteria are needed and would bring clarity.**

#### **4. Have there been unexpected or perverse outcomes**

##### **4a. Heritage Value Oriented Policy**

Heritage buildings need policy to guide physical changes to ensure what makes the buildings of heritage value is maintained by the planning authority when considering whether to consent to proposed ‘development’.

The current policy applicable to local heritage in the City reflects the listing processes to date. These are as follows:

- Local Heritage Places – City Significance – the substantial whole of the building
- Local Heritage Places – exterior of the whole original building
- Local Heritage Places (Townscape) – façade and roof visible from the street
  - In non-residential zones – 6m retention depth
  - In residential zones – 4m retention depth

Over the last five years, Council and the Minister for Planning have different opinions around the appropriate statutory policy terminology around proposed development in the nature of part demolition of a heritage place. The matter has to do with the wording of non-complying policy.

Assessment policy able to be established under the *Planning, Development and Infrastructure Act 2016* (SA) does not include ‘non-complying’, with different policy and procedural tools. There is opportunity for further investigation and a settled position to be established in the proposed Planning and Design Code.

**If the heritage authority considers a building to be of heritage value to warrant listing, the policy settings to guide ‘development’ should have the highest policy bar possible for the assessment of proposed changes. This includes the policy settings of the proposed Planning and Design Code.**

#### **4b. Heritage Value Oriented Planning Assessment**

A key role of the current planning system is to make decisions about proposed development impacting State and Local heritage places. Development impacting a heritage place can be:

- directly impacting the fabric that comprises the building (such as part demolition or alteration)
- development 'adjacent' to the heritage building.

In the City of Adelaide, development valued above \$10M is assessed and determined by the State Commission Assessment Panel (formerly the Development Assessment Commission). Development less than \$10M in value is determined by the Council Assessment Panel (formerly the Council's Development Assessment Panel).

Schedule 8 of the *Development Regulations 1993* (SA) requires statutory referral to the Minister administering the *Heritage Places Act 1993* (SA) for 'development which directly affects a State heritage place, or development which in the opinion of the relevant authority materially affects the context within which the State heritage place is situated'. Schedule 8 obliges the planning authority to have 'regard' to the advice from the Minister. If the planning authority is a council (or a council appointed Panel) and that authority does not totally adopt the recommendation, or any condition proposed by the Minister, the concurrence of the now State Commission Assessment Panel is required by Schedule 8.

The 'Table of Developments valued over \$10M Granted Consent and Impacting Heritage Places in City of Adelaide 2012–2018' (refer **Attachment B**) details information pertaining to such development impacting State and/or Local heritage places. It is based on information available to Council at the time of preparation of this submission. These have been granted planning consent. The table contains comments provided by the delegate for the Minister regarding development impacting State heritage places in response to statutory referral. Noting that no formal referral exists for local heritage places, the table contains known comments provided by Council's professional heritage architects.

The following observations and questions based on the information are raised for consideration:

- A planning authorities assessment of a development is an on balance assessment in relation to the policies in the Development Plan, including heritage policies. The assessment weighs and balances the facts of a situation, including in relation to heritage value and fabric. The processes of considering alternatives invariably involves considering trade-offs. This means that an 'ideal' heritage outcome the planning system cannot always deliver. It is suggested that more consideration is undertaken to determine what package of policy, practice, and resources is needed to achieve a more ideal heritage outcome.
- There are examples of heritage buildings with conservation management plans (e.g. 261 – 266 South Terrace) that informed the design of the new development. This management plan enabled the development to maintain the heritage value and also approved with more certainty.
- There are examples of development 'adjacent' to heritage buildings (e.g. 200 - 206 East Terrace) that have been considered appropriate.
- There are examples of development proposals that have involved removal of a significant extent of heritage fabric, that is often at odds with expert heritage advice.

- The current statutory referral involves consideration of impact on State heritage places only. There is no statutory referral for development impacting Local heritage places. Past assessment practices have considered the local heritage value but with a variety of practices that are not consistent. For example, Council's heritage adviser's written advice was relied on by DAC to support the full demolition of a Local Heritage Place (Townscape) (e.g. 174- 180 Wright Street). This differs to where there was a substantial demolition of most of a Local Heritage Place (City) – in the case of Queen Adelaide Club - a building recognised as having heritage value – Council's heritage advisers had no role. This demonstrates an inconsistent practice.
- Planning professionals providing advice on development are not heritage professionals (be it a heritage architect or historian).
- It is practice for proponents of major development to engage professional heritage advice. Is it appropriate that a major development – with or without professional heritage advice provided by the applicant – be determined by a planning authority in the absence of that authority receiving its own independent heritage advice?
- For some developments, heritage advice questions the extent of proposed height, with concern that the extent of height dwarfs the much lower heritage fabric (e.g. 1 – 8 North Terrace). Heritage advice has suggested refinement to façade design to better resolve the scale difference through appropriate architectural treatment and design. It's not known if these have been incorporated into the consents by the planning authority.
- Some developments involve demolition of heritage fabric, such as a standalone structure or fabric at the rear of the site (e.g. 48-51 Brougham Place). In some cases, development involves reuse of heritage fabric facing the street with new building behind and upwards. However, to enable this, the historic fabric at the rear needs to be demolished. The heritage advice has either opposed this due to heritage value represented or taken the approach that the demolition at the rear 'lessens' the heritage value but does not remove it. The concern that arises is 'incremental' loss of heritage value, and at what point should the authority say no. In the 1980's, the planning system experienced this with the heritage listed former Working Women's Creche on Gouger Street. In 1985, demolition occurred with its façade left to the depth of one room and in 1988, demolition of the remnant was approved upon appeal. This observation underscores the importance of independent heritage advice being received, in particular for major developments.
- For some developments, the proposed new building has been consented and developed but the consent did not require conservation works to the heritage fabric prior to occupation of the new building (e.g. 318 South Terrace, and 69 Light Square). This enables the proponent to bring to market the new building with some risk that the heritage building languishes. This risk should be further investigated.
- Statutory reform should be considered to enable power of direction for development impacting heritage places, and thereby overriding conservation values, in certain circumstances.

Council administers a Council Assessment Panel (formerly Development Assessment Panel). The practice of Council administration is that officers bringing reports to the Panel do so after having regard to professional heritage advice.

In terms of a future planning system, based on Council's position of 2016 <sup>(1)</sup>, an ideal system should have mechanisms to ensure 'independence' of advice received by a planning authority making decisions on development impacting a heritage place. This includes both State and



Local heritage places. Mechanisms need to be established to ensure ‘arms-length’ decisions by a planning authority when receiving advice from accredited professionals acting for proponents of development. Council has strong reservations about the use of private certification in heritage development assessment decisions and expects it will lead to inconsistent, convenient or inconclusive advice on applications involving heritage. The heritage advisory system is well-regarded and recognised as independent best practice.

**These observations and questions regarding the practice of planning assessment regarding heritage should be considered by the Inquiry.**

## 5. Any Other Relevant Matter

### *Plan for Heritage as part of Planning for Population Growth and Future Development*

Heritage contributes economically, culturally and socially. Where built heritage has been listed or zoned, planning authorities should establish long term strategies – such as the 30 Year Plan for Greater Adelaide – and development policies – such as the Planning and Design Code – to guide new development to appropriately coexist with heritage and character.

The planning system must enhance heritage values to ensure that the economic benefits can be multiplied for the benefits of our communities and future generations.

It is a role for planning authorities to ensure that the statutory planning system enables anticipated population growth to occur successfully with heritage. This will mean careful policy setting for new buildings in character suburbs and adjacent to heritage buildings, as well as additions and alterations to heritage buildings.

Greater Adelaide is forecast for ongoing steady growth. It has significant opportunity to accommodate new buildings of a scale and design that complement established heritage and character. Objectives of population growth and heritage protection are not conflicting. This will take work by planning authorities to establish appropriate planning policy. In the case of the City of Adelaide, investigations<sup>23</sup> undertaken have affirmed that with the City's current heritage listings and Development Plan, the City has significant capacity to accommodate planned population (refer **Figure 4**).

	30 Year Plan Targets (additional population)	Potential Yield under October 2012 Development Plan	Planned Total Population for 2040 (being 2012 population plus targets)
Additional Residents	27,300	60,140	47,300
Additional Workers	50,000	80,230	170,000
Additional Dwellings	15,040	33,411	

**Figure 4      Planned Population Capacity to Accommodate Forecast Growth**

Engagement undertaken to inform the future of the City has affirmed fundamental support for City population growth in terms of businesses, workers, residents, students and visitors. This position is contained in the City of Adelaide 2016–2020 Strategic Plan<sup>24</sup>.

The proportion of potential heritage listed places compared to capacity for new construction across SA is negligible. It is a myth that keeping old buildings is a limit on progress.

**Long term planning and policy setting should plan for heritage as part of planning for population growth and future development.**

<sup>23</sup> *Adelaide: One City, Many Places: A Spatial Vision for the Future of the City*, (City of Adelaide, 2014), p23

<sup>24</sup> *City of Adelaide 2016-2020 Strategic Plan*, (City of Adelaide, 2016)



### ***Heritage Reform Roundtable***

In June 2018, the Minister for Environment and Water, David Speirs MP, advised Council of the Minister's intent to explore a heritage reform roundtable for the conservation of the State's heritage for future generations.

Acknowledging that the heritage recommendations of 2014 of the Expert Panel for Planning Reform<sup>25</sup> have not progressed, Council's position<sup>26</sup> supports the establishment of a roundtable of industry, government and community.

A roundtable enables a collaborative approach across different sectors.

**Council looks forward to the establishment of the heritage reform roundtable.**

### ***Historic Elements in the Public Realm***

Currently, historic elements in the public realm are not necessarily heritage listed. These historic elements can include the historic footpaths, kerbing, seating, light poles and markers etc. Given the current legislative framework, these items/elements can be removed without consideration for their heritage value.

Removal can occur, for example, through local traffic works, state-wide traffic works, and other construction works. In addition, road widening, or street design can affect the heritage value of the area or a heritage place. This could be through placement of new urban elements that are not sensitive to their context.

Note that the Expert Panel for Planning Reform recommended<sup>25</sup> that 'A new integrated heritage register should be established to include existing state and local listings and have an expanded capacity to recognise special landscapes, building fabric and setting and to place historic markers'

**Given the PDI Act enables more players in the public realm through design standards and encroachments, there is a risk of a negative impact on historic elements.**

### ***Incentives, Information and Research Are Important***

As one of the key heritage management agencies for over 30 years, it is Council's experience that built heritage regulation and policy is only successful when accompanied by information, professional advice for property owners, incentives for conservation works and heritage promotions. This is all part of the Council's Heritage Incentives Scheme.

Without these, regulation and policy will not enable property owners and occupiers to be able to best utilise their building in contemporary ways, and the wider community to understand and then appreciate the value of our built heritage.

<sup>25</sup> *The Planning System We Want*

<sup>26</sup> *Position on Heritage Reform*, p7

The SA Government has been active in the past in support of built heritage. A recent activity is the 'Building Upgrade Finance' statutory mechanism providing a different funding mechanism for building upgrades. Whilst the mechanism is principally aimed for sustainability outcomes, the legislation explicitly enables the conservation of heritage fabric.

Heritage listing is only successful when accompanied by information, professional advice for property owners, incentives for conservation works and heritage promotions.

**Heritage listing is only successful when accompanied by information, professional advice for property owners, incentives for conservation works and heritage promotions.**

### *Heritage Lottery*

The Local Government Association is liaising with the State Government to investigate the feasibility of establishing a state-based lottery to assist in subsidising heritage projects and heritage property upgrades. Establishing a heritage lottery was recommended by the Expert Panel for Planning Reform<sup>27</sup>.

Lottery based schemes to support conservation works for heritage buildings exist in the UK and Western Australia.

**Council supports a heritage lottery mechanism being scoped for establishment in SA.**

### *Skills Gap in Heritage Conservation Trades*

The conservation of built heritage places requires specialised trade skills which differ from normal building practice e.g. stonework, plasterwork, carpentry and joinery. Whilst there are currently a handful of individuals with these specialised skills, many are close to retirement and there are limited pathways available for this expertise to be passed on.

This looming skills gap presents a training and employment opportunity. Research indicates these specialised trades are a valuable niche in a local economy.

**An ideal system integrates fostering of specialised trades in heritage conservation. Work is needed to identify the best role for the public sector to foster these trades.**

### *Coordinated Repository of Heritage Value Investigations*

Professional heritage surveys and building assessments are undertaken to inform the process of evaluating the heritage value of a building or buildings. On occasion, there are multiple professional assessments undertaken about the same building by different professionals.

<sup>27</sup> *The Planning System We Want*

Whilst these assessments are typically public information, such assessments are not always easily available.

The actual documents that are the 'heritage list' are statutory in nature and contain limited information, typically a summary of what is listed, and location information.

**An ideal system would have a coordinated repository of all professional heritage investigations evaluating heritage value in SA.**

### ***Negotiating Fire Safety and Disability Access in Heritage Buildings***

Changes impacting heritage buildings also need to satisfy the National Construction Code and disability access standards. Council's building surveying officer's statutory role – including the Building Fire Safety Committee – is to achieve important outcomes for the community around managing risk of fire and life safety, disability access, and ensuring buildings are safe to occupy. This includes heritage buildings.

**Satisfying building code and disability standards for heritage buildings involves a case by case, negotiated approach.**

## ATTACHMENT A – CHRONOLOGY OF LOCAL HERITAGE LISTING PROCESSES IN THE CITY OF ADELAIDE 2004–2018

The following summarises the listing processes for local heritage proposals. The comments in grey boxes are intended for the Inquiry.

### Adelaide – City Centre/Capital City Zone Part

#### 2008

Council adopted two Statements of Intent to commence a City Heritage & Character Central Business Area/Mixed Use Zones DPA (renamed City Centre DPA in 2012) as well as a City Heritage & Character Residential & Main Street (Hutt) Zones DPA. After some variations in 2009, the Minister agreed to both Statements of Intent.

Donovan and Associates commenced a heritage survey to identify unlisted buildings that they assessed as meeting the local heritage criteria.

Council endorsed briefs for Population Growth and Business Impact Studies.

In late 2008, Council considered the investigations and prepared the DPA.

#### 2009

In mid-2009, Council formally consulted government agencies regarding the DPA

In late 2009, the Minister advised of his referring the 251 listings to the Development Policy Advisory Committee with terms of reference regarding *whether the listings amplify or duplicate the levels of representation achieved by current listings, the appropriateness of listings part of originally larger buildings as well as those altered, and the relationship of the listings to the 30 Year Plan for Greater Adelaide and the then commencing Integrated Design Strategy.*

This request was in effect applying 'additional tests' to review listing proposals that had been independently supported as meeting the local heritage criteria in S23 *Development Act 1993* (SA). This is an experience of moving goal posts.

#### 2010-2011

The Development Policy Advisory Committee (DPAC) considered the City Centre DPA listings during 2010. The Minister considered DPAC's advice as well as advice from DPTI during 2011.

The City Centre DPA did not progress at all for two years.

#### 2012

Concurrent with the Capital City DPA, the Minister split the DPA. A City Centre Part 1 DPA with 78 listings the Minister approved for consultation and interim development control.

The City Centre Part 2 DPA 170 listings remained under consideration by the Minister and Council. As the Statement of Intent has the same timeframe as the Residential Hutt Part 2 DPA, this City Centre Part 2 DPA lapsed in 2014.

Council has no information as to the basis regarding local heritage criteria for the 170 listings being separated from the 78. This is an experience of a transparency deficit.

## 2013

The City Centre Part 1 DPA underwent consultation.

- Following consideration of objections and advice from LHAC, 37 listings were approved by the Minister for gazettal and 41 listings not proceeded with.

In December, the City Centre Part 2 DPA was granted a two year extension by the Minister. This occurred to enable the final report on the Expert Panel to be considered.

## 2014

The City Centre Part 2 DPA with 170 proposed listings lapsed in February.

The basis for not progressing these proposed listings was unrelated to the local heritage criteria in S23 of the *Development Act 1993* (SA).

## Adelaide – Residential and Main Street (Hutt) Part

### 2008

Council adopted two Statements of Intent to commence a City Heritage & Character Residential & Main Street (Hutt) Zones DPA as well as a City Heritage & Character Central Business Area/Mixed Use Zones DPA (renamed City Centre DPA in 2012). After some variations in 2009, the Minister agreed to both Statements of Intent.

Donovan and Associates commenced a heritage survey to identify unlisted buildings that they assessed as meeting the local heritage criteria.

Council endorsed a brief for Business Impact Study.

In late 2008, Council considered the investigations and prepared the DPA.

### 2009

In mid-2009, Council formally consulted government agencies regarding the DPA.

The Residential/Hutt DPA with 180 proposed listings and the Central Business Area/Mixed Use Zones DPA with 251 proposed listings were forwarded to the Minister seeking approval for community consultation with concurrent interim control.

In late 2009, regarding the Residential/Hutt DPA, the Minister advised of support for 64 of the 180 and requested 116 be reviewed *“to distinguish those with historical significance from those with more marginal history, in addition to those that are isolated or have been damaged by changes since their construction”*.

This request was in effect applying ‘additional tests’ to review listing proposals that had been independently supported as meeting the local heritage criteria in S23 of the *Development Act 1993* (SA). This is an experience of moving goal posts.

Following various negotiations with the Minister, 84 listings were supported by the Minister for consultation in a Part 1 Amendment, 23 listings were included in a Part 2 Amendment, and Council resolved to not proceed with 73 listings.

## **2010**

The Residential/Hutt Part 1 DPA with 84 listings underwent consultation.

- Following consideration of objections and advice from LHAC, 64 listings were approved by the Minister for gazettal and 20 listings were not proceeded with.

## **2011**

Regarding the Residential/Hutt Part 2 DPA with 23 listings, the Minister (Holloway) advised of not being prepared to support its release for consultation. Reasons articulated – in summary - as being over-representation of historic themes, compromised physical integrity and possible inconsistency with the 30 Year Plan for Greater Adelaide. In mid-2011, the Minister (Rau) affirmed the position and the 23 proposed listings did not progress, with the DPA eventually lapsing three years later in 2014.

## **2012–2013**

The Residential/Hutt Part 2 DPA did not progress at all for two years.

## **2014**

Residential/Hutt Part 2 DPA with 23 proposed lapsed in February.

The basis for not progressing these proposed listings was unrelated to the local heritage criteria in S23 of the *Development Act 1993* (SA).

## **North Adelaide**

### **2003 and 2004**

The North Adelaide Heritage Survey was undertaken by heritage consultants, McDougall and Vines. In parallel, Council and a delegate for the Minister agreed to a Statement of Intent to commence an amendment to the Development Plan. This agreement enabled Council to release the Amendment for consultation without seeking the Minister's prior approval.

The North Adelaide Heritage and Character Amendment to the Development Plan was released for consultation.

### **2006 and 2007**

The North Adelaide Heritage and Character Part 1 and Part 2 DPAs were approved by the Minister for gazettal

- All existing local heritage listings reviewed and updated
- Around 220 previously unlisted buildings local heritage listed
- The North Adelaide HCZ established.

## **2016**

Council submitted a Heritage Places (Institutions and Colleges) DPA Statement of Intent to the Minister. The Minister agreed.

## **2017**

The Heritage Places (Institutions and Colleges) DPA underwent consultation and interim development control

- Following consideration of objections and advice from the State Planning Commission, no listings were approved by the Minister to be proceeded with.

Regarding the decision to not proceed, Council found out the decision through the media rather than a formal advice of the decision to the Council. The reason Council was advised the places were not listed was due to lack of information from Council which Council was not asked to provide.

Also, as the Ministerial decision to not list the nine buildings was not statutorily brought to the Environment, Resources and Development Committee, there was no opportunity for formal review of the Ministerial decision or opportunity for the basis for decisions and any additional information to be reviewed.

The advice to the Minister for Planning is not publicly reviewed and is not open for scrutiny prior to a decision being made. This is an experience of a transparency deficit. This experience also illustrates a questionable administrative process.

## **Park Lands**

### **2007**

The Adelaide Park Lands and Squares Cultural Landscape Assessment Study (October 2007) by Dr David Jones. This informed Community Land Management Plans.

### **2013**

In the Park Lands, in parallel with the eventual State Heritage designation of 14 places, consultants identified a number of places as being of local heritage value.

### **2014**

Council submitted a Local Heritage in the Park Lands Statement of Intent to the Minister in order to designate the consultants identified local heritage places. The Minister did not agree to it. This was in light of the upcoming heritage review via the Expert Panel as well as regard for the level of protection already applicable through Community Land Management Plans, the public ownership of buildings in the Park Lands, the recognition of the Park Lands in the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 and the pending consideration of the Park Lands as a State Heritage Place.

The basis for not progressing these proposed listings was unrelated to the local heritage criteria in S23 of the *Development Act 1993* (SA).

## Attachment B – Table of Developments valued over \$10M, Granted Consent and impacting Heritage Places in City of Adelaide 2012–2018

## ATTACHMENT B – TABLE OF DEVELOPMENTS VALUED OVER \$10M GRANTED CONSENT AND IMPACTING HERITAGE PLACES IN CITY OF ADELAIDE 2012–2018

Address	Council / SCAP No.	Description of Proposed Development	\$ Value of Development	Heritage Place	Decision	Decision Date
<b>1-8 North Terrace ADELAIDE</b>	S10/55/2015 / 020/A081/15	<b>Partial demolition of a State Heritage</b> place and conversion to a hotel; construction of a mixed use development comprising retail, consulting rooms and residential apartments, supported by basement car parking.	150,000,000	State Heritage Place	Planning Consent Granted	21/01/2016
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Advice from Delegate for Minister (extract):</p> <p>'The proposed demolition of the two-storey rear wing, the two-storey outbuilding and the yard wall <b>will diminish</b> the historic integrity and heritage values of the Newmarket Hotel.</p> <p>The proposed internal and external works to the remaining three-storey section of the hotel, and its proposed use, will benefit the heritage values and longer term care of the place.</p> <p>The lack of set-back of the northern tower from the eastern alignment of the Newmarket Hotel is likely to be perceived as visually overbearing, both in views from the north and in the approach along Port Road.</p> <p>The design of the two podiums and their interrelationship with the Newmarket Hotel should undergo further design development.</p> <p>The height of the proposed development is inconsistent with neighbouring development, with a consequential increase in its impact on the setting of the Newmarket Hotel.</p> <p>The façade design of the north tower is considered appropriate as a visual backdrop to the Newmarket Hotel in the approach along Port Road.'</p>						
<b>13-20 East Terrace ADELAIDE</b>	S10/20/2015 / 020/A022/15	Mixed Use development comprising works <b>affecting local and State Heritage places</b> and the construction of a residential tower above with associated car parking.	20,000,000	State and Local Heritage Places	Planning Consent Granted	5/08/2017
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Advice from Delegate for Minister (extract):</p> <p>'The proposed development is considered to <b>negate the landmark quality</b> of the Stag Hotel (State heritage place).</p> <p>The proposed development is considered to be incompatible with and to diminish the historic low-rise urban context of the many State heritage places within the East Terrace precinct between Pirie Street and North Terrace.'</p> <p>The DPTI report to DAC stated 'The Government Architect and the State Heritage Unit do not support the proposal, forming the view that the proposal is inconsistent with the scale, quality and fine grain of Rundle Street East and the existing streetscape qualities which define the historic low-rise urban character of the precinct. The State Heritage Unit also considers that the proposal negates the landmark quality of the State Heritage listed Stag Hotel.'</p> <p>Note: DAC refused the development and upon appeal and consideration of amended plans, the development was granted consent.</p>						



## Attachment B – Table of Developments valued over \$10M, Granted Consent and impacting Heritage Places in City of Adelaide 2012–2018

Address	Council / SCAP No.	Description of Proposed Development	\$ Value of Development	Heritage Place	Decision	Decision Date
<b>141-159 King William Street ADELAIDE</b>	S10/33/2015 / 020/A047/15	Works <b>affecting the State Heritage listed GPO Building</b> , construction of a 15 storey office building above the existing GPO, a new archway entrance building, retail tenancies, alterations to the telephone exchange building, a ground level piazza space and associated works, loading dock (Stage 1 of the GPO redevelopment)	97,600,000	State Heritage Place	Planning Consent Granted	29/10/2015
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Advice from Delegate for Minister (extract):</p> <p>'The State Heritage Unit is a mandatory referral in accordance with Schedule 8 of the Development Regulations 2008 and the Commission must have regard to their comments. As previously advised the heritage advice only relates to the parts of the building not owned by Australia Post but may include consideration of any material effect of the proposed works (being undertaken on land not owned by Australia Post) on the context in which the State Heritage listed buildings (including both the Telephone Exchange building and the GPO Building proper) are situated. The <b>SHU concurs with the advice provided by Dash Architects in the State Heritage Impact Assessment</b>. This is subject to conditions and advisory notes as recommended.'</p>						
<b>174-180 Wright Street ADELAIDE</b>	S10/3/2014 / 020/0038/13A	<b>Demolition of a local heritage place (townscape)</b> and the construction of a mixed use development, comprising basement display space, retail uses on ground floor (cafe/hotel reception), 8 levels of hotel rooms above and three townhouses	11,500,000	Local Heritage Place (Townscape)	Planning Consent Granted	30/01/2015
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>The DPTI report presented to the DAC stated:</p> <p>'Accordingly, the proposal will be assessed on its merits, taking into account the significance of the local heritage place. Qualified opinions from acknowledged heritage experts, including the opinion of Council's local heritage advisor as well as the view proffered by the proponent's consultant will assist to inform the assessment. Flightpath Architects Pty Ltd, acting for the proponent, advises that Local Heritage Places (Townscape) were identified in a townscape Survey undertaken between 1988 and 1990 and listed in the early 1990s. The heritage values of these places relate to those parts of the building that can be seen from the street (i.e. the front façade and side walls of the building). It is notable the listing of the buildings occurred without the application of the Development Act 1993 Section 23(4) Criteria. The Development Plan indicates (PDC 140) that for townscape places the depth of the building to be retained as part of any redevelopment (referred to as the retention depth) is six metres. A Local Heritage Place (Townscape) is listed for the contribution it makes to the street and therefore any development, including demolition is assessed against any impact the loss has on the street.</p> <p>Of particular importance is whether the proposed demolition of the local heritage place is justifiable. In considering the report prepared by Flightpath Architects, the reasoning provided within the report regarding the basis for the buildings listing, the current criteria and approach taken to listings, the affected state of the buildings structural fabric, the progressive transformation of the original buildings physical appearance and resultant diminished heritage integrity, I am of the opinion that there is sound reason to consider supporting the proposed demolition. The demolition should not however be considered in isolation and a degree of weight must be given to the merits of the proposal that is to replace the existing development.</p> <p>Adelaide City Council comments</p> <p>Following a resolution of the Council, a response has been provided through the Category 2 notification process opposing the demolition of the local heritage place, seeking its retention and conservation. This response is the formal resolution of the Council from its meeting of 10 December 2013. The Administration's advice to the Council members conveyed within the agenda item included an assessment by Council's heritage architect, of the proposed demolition of the heritage places in the context of the relevant Development Plan provision guiding the assessment of proposals that seek to demolish a local heritage place (PDC 139). <b>The report by Council's heritage advisor is both detailed and balanced. The advice provided to Council makes note of the (current) integrity of the remaining fabric to both buildings is no longer</b></p>						

## Attachment B – Table of Developments valued over \$10M, Granted Consent and impacting Heritage Places in City of Adelaide 2012–2018

Address	Council / SCAP No.	Description of Proposed Development	\$ Value of Development	Heritage Place	Decision	Decision Date
<p><b>reasonably capable of adequately representing their heritage value as local heritage places.</b> It suggests that in reality any heritage value, in this case townscape value, relates to the potential of the buildings to be reconstructed rather than their current intrinsic value. In conclusion Council's heritage advisor notes the current description within the Development Plan of what is actually listed is ambiguous and confusing. In addition, the integrity of both buildings has been seriously compromised by past alterations such that the remaining building fabric could be argued to no longer be capable of adequately representing their heritage value as local heritage places. This is further exacerbated for 174-176 Wright Street due to extensive salt damp, which has caused serious damage.'</p>						
<b>2-12 King William Street ADELAIDE</b>	S10/33/2012 / 020/0040/12A	Additions and alterations including <b>partial demolition</b> and change the use from office to office/retail and hospitality.	10,500,000	State Heritage Place	Planning Consent Granted	20/12/2012
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Advice from Delegate for Minister <b>supported</b> with reserved matters.</p>						
<b>203-205 North Terrace ADELAIDE</b>	S10/1/2014 / 020/0003/14A	The <b>adaptive reuse of a State Heritage</b> listed building and construction of a tower above, with a combined total of 19 levels and basement, comprising residential, office and commercial uses, roof top garden and ancillary car parking	20,000,000	State Heritage Place	Planning Consent Granted	12/06/2014
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Advice from Delegate for Minister (extract): 'Considering the purpose of the heritage referral to provide expert heritage advice to assist the Commission in reaching its decision in the context of the Development Plan, I confirm my opinion that the project overall <b>has a significant impact on the heritage values of the place.</b> The irreversibility of the changes, in conjunction with the degree of fabric loss and intervention into the place, is contrary to the objects of the Heritage Places Act, and to the Burra Charter principles of conserving cultural significance, appropriate use, appropriate adaptation and reversibility. This position is consistent with the advice I have offered and issues I have identified throughout the pre-lodgement process, but I also acknowledge that the project has gained favourable support in planning and urban design terms as it has evolved through the Prelodgement and design review processes.'  The DPTI report to DAC stated 'The professional opinion of the Minister's delegate is that <i>the proposal has a significant impact on the heritage values of the place. The irreversibility of the changes, in conjunction with the degree of fabric loss and intervention into the place, is contrary to the objects of the Heritage Places Act, and to the Burra Charter principles of conserving cultural significance, appropriate use, appropriate adaptation and reversibility.</i>'</p>						
<b>261-266 South Terrace ADELAIDE</b>	S10/40/2014 / 020/A053/14	<b>Demolish rear sections of existing building</b> and use as offices, construct 15 level residential building at rear of property with carparking from basement to level 2, offices on ground floor and roof garden - 60 apartments.	13,000,000	State Heritage Place	Planning Consent Granted	18/12/2014
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Advice from Delegate for Minister (extract): 'The Conservation Management Plan and Heritage Impact Statement included with the application together provide a comprehensive assessment of the cultural significance of the place, appropriate conservation policies for retention and recovery of cultural significance, and the impacts of the proposed development on the cultural significance and visual context of the place. <b>The findings of the two documents are supported</b>, with one exception — the timing and decision-making process for adaptive re-use interventions, as detailed in the recommendation below.</p>						

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The proposal provides for the commercial viability of the place in a manner that generally retains its identified cultural values, recovers lost cultural values and retains its visual prominence within its setting.'						
<b>48-51 Brougham Place NORTH ADELAIDE</b>	S10/54/2015 / 020/A080/15	The demolition of existing buildings and the construction of a mixed use development comprising of the following: a) Three towers for retirement living with ground level cafe and wellness centre b) A tower for serviced apartments with ground level retail, cafe and restaurant land uses c) Basement carparking and site works d) <b>Works affecting State and Local heritage places.</b>	69,398,450	State and Local Heritage Places	Planning Consent Granted	11/02/2016
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Advice from Delegate for Minister was not provided in the statutory timeframe.</p> <p>The DPTI report to DAC stated 'Although there was no referral response, there were <b>concerns raised</b> throughout the Pre Lodgement Service process in relation to the partial demolition of the State Heritage fabric of the building. In addition, it was indicated that the stables are historically linked to the main dwelling, and therefore, any severance of this link, (such as the proposed stage 1 tower) will significantly impact on the heritage value of the place and its setting.'</p> <p>Council provided informal advice 'Retention of the Local Heritage Place and front fence is <b>supported</b> as this retains the heritage value of the Local Heritage Place and reinforces the 'dress circle of grand dwellings' on Palmer Place and Brougham Place' 'Demolition of the remnant stone wall and cresting of the Local Heritage Place is <b>not supported</b> noting that the intent is to open views in this location. This wall is part of the heritage listing for this site and should be retained. (The wrought iron palisade is non-original and may be removed).'</p>						
<b>Former Channel 9, 202-208 Tynte Street, NORTH ADELAIDE</b>	020/A076/17	A mixed use development comprising the demolition of non-heritage buildings, <b>Adaptive reuse of heritage buildings</b> construction of serviced apartments, residential apartments, row dwellings, cafe, bakery and shop-top residence, associated off street parking and landscaping and the removal of one significant tree.		State and Local Heritage Places	Planning Consent Granted	Deferred in June 2018: Consented 9/08/2018
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>On 14 June 2018, the DPTI report presented to the SCAP states:</p> <p>'From a land use and density perspective, the application is supported. However, <b>Heritage South Australia does not support the excising of the State Heritage listed former Primitive Methodist Church from the overall site. This has the potential to result in this building not being conserved or adapted to a future use and therefore not realising the potential of the heritage place.</b> While there are design and heritage adjacency concerns with the proposal, and some shortfalls in car parking provision, on balance the proposal is considered to be acceptable and satisfies the intent for the zone and policy area.'</p> <p>Council was able to comment as an adjoining landowner through the Category 2 notification process. As part of that process, the DPTI report to SCAP stated 'The City of Adelaide has also provided a formal Category 2 representation in relation to a number of planning matters, including land use, heritage impacts, design and bulk and scale, lack of car parking, traffic, overlooking and waste (refer to Section 6 of this report). It is noted that Council was provided with the amended plans as a result of the notification process but did not make any further comment.'</p> <p>Council's heritage comments as part of the Category 2 process were:</p>						

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Multi storey serviced apartments

Overall the **massing, scale and appearance of the development in relation to the Zone is considered to support** the objectives for the North Adelaide Historic (Conservation) Zone. Design refinement is required to some elevations to achieve compatibility with the heritage values of the Zone:

The three-level glazed curtain wall on the south elevation introduces a hard-edged commercial character to the streetscape; it is not considered to achieve a compatible visual relationship with the adjacent the state heritage place: the former Primitive Methodist Church and the local heritage place at 198-200 Tynte Street.

The extent of blank walling on the North elevation, which will form a backdrop to dwellings in Gover Street is not considered to achieve the principles for new development within the Zone;

new development should reinforce the desired character by compatible: ... form and visual level of interest as determined by length and size of unbroken walling, articulated and modulated frontages...

The Mansfield Street edge of the serviced apartments with angled precast concrete blade walls and a wide garage opening is out of character with the low scale heritage character of Mansfield Street. The northern portion of Mansfield Street retains high heritage integrity with 10 modest single storey local heritage places. The ground level frontage does not meet the Desired Character of development to the Mansfield Street frontage will be low scale, and create a cohesive streetscape that enhances the historic pattern of development and development which should reflect: the more intimate scale and siting of historic and established form. It is recommended that the form, height and finishes of the angled wall and the design of the garage door are

revised to maintain the historic character of the Mansfield Street locality.

Bakery and Apartment - corner of Mansfield Street

The scale of the proposed new two storey building on the corner of Mansfield Street is considered appropriate for the Policy Area. The built form and frontages require further refinement to achieve a compatible visual relationship with the local heritage places at 198-200 and 188-190 Tynte Street.

Local Heritage Place -Tynte Street

The local heritage place at 198-200 Tynte Street is situated between the proposed multi-storey serviced apartments and the two storey Bakery and apartment on the corner of Mansfield Street. **The siting of the adjacent new buildings is considered to retain the heritage significance of the local heritage place.** Conservation and adaptive re-use of the local heritage place is supported. The Tynte Street elevation (drawing no. 15.225.DA.12) shows a new pergola in front of the local heritage place which will obscure the front facade from the street and have a negative impact on the heritage value of the place. This element should be omitted and a low open front fence compatible with the style of the dwelling provided.

Gover Street Apartments

The proposed apartments are within a finger of the Tynte Street Policy Area 4 which extends into the Childers Street East Policy Area 2. The apartments replace a 1960's store building formerly associated with Channel Nine. The Desired Character for the Policy Area is that the building will be: replaced with low scale dwellings. The built form of dwellings on this portion of the site will reinforce the character of the historic development pattern of detached dwellings and complement the more generous scale and siting patterns of Heritage Places within Gover Street. The historic character of the immediate locality is high. The four local heritage places west of the development site are all Victorian era villas with similar front setbacks, traditional palisade front fences and side setbacks. The two local heritage places east of the development are turn of the century dwellings also with side setbacks and low front fences. **The built form, massing, finishes and visual interest of the proposed apartments fail to reference or acknowledge the adjacent local heritage places and prevailing character of the locality. The proposed four apartments are an overdevelopment of the site which clearly conflicts with the desired character for the adjacent Policy Area and will have a negative impact on the historic streetscape of Gover Street.** The proposed private open space at the front of the ground floor dwellings will necessitate a high fence along Gover Street which conflicts with the Development Plan principles of low fencing or fencing with an open character for the zone. It is recommended that the design is revised to:

- accommodate a maximum of two dwellings on this site;
- pay regard to Principle of Development Control 3 for the Zone and
- be compatible with the prevailing character of the locality

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<p>Wellington Square cottages</p> <p>The Wellington Street cottages are a row of modest former worker's cottages in the north-eastern corner of Wellington Square, situated behind a later unattractive brick and palisade fence. Front fencing would have originally been simple timber pickets. The cottages are an important visual element in Wellington Square, providing a stark contrast with the grandeur of the adjacent former Primitive Church and grand dwellings on the western side of the Square. <b>Refurbishment of the Wellington Street cottages is supported</b>, however the floor plan of the two northern cottages with living spaces at the front and an additional bedroom creates very poor quality open space at the rear. The plans indicate private open space at the front of the cottages, which will result in high fencing along the frontage and loss of the public view with a resultant negative impact on the Wellington Square streetscape. It is recommended that the western boundary of the cottages is extended and that the floor plan is reconsidered to achieve private open space at the rear.</p> <p>Former Primitive Methodist Church, Wellington Square</p> <p><b>The proposal to excise this State Heritage Place from the site is of concern. Excluding the building from the development leaves it with an uncertain future and places it at risk of further deterioration.</b> This landmark building should be a centrepiece of the proposed mixed-use development which complements the overall Channel Nine site redevelopment. The building could be revitalised for many uses such as arts and performance spaces, which would allow continued public access to the building and achieve the Desired Character for the Policy Area of development which reinforces the dignity and quality of public buildings in the street.</p>						
<b>ADELAIDE FESTIVAL CENTRE</b> King William Road ADELAIDE	S10/7/2016 / 020/A012/16	<b>Demolition works</b> and the construction of a car park over 5 basement levels a 27 level office tower (including ground level retail two levels of plant rooms); and a retail building of up to three levels.	230,000,000	State Heritage Place	Planning Consent Granted	10/11/2016
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Advice from Delegate for Minister (extract):</p> <p>'The principal heritage issues are summarised as follows.</p> <p>Notwithstanding the highly desirable gains that the redevelopment of the plaza and increased activation of the precinct are expected to bring, the introduction of a commercial land use into a precinct defined by cultural values grounded in the arts, civic governance and public transportation comes at the cost of a considerable loss of heritage fabric, visual setting and cohesive scale relationships.</p> <p>The proposed tower's height and physical presence is a dramatic intervention into the low-scale heritage precinct of unusually high integrity and cultural value and <b>diminishes the heritage significance of the Adelaide Festival Centre</b> that, by truncating its original expansive setting to the extent that the Festival Theatre and Drama Centre lose the breathing space needed to appreciate such visually significant buildings.</p> <p>The proposal <b>also diminishes the visual presence of the four State heritage places</b> within their context, through the dramatic contrast in scale between the tower building and the low-scale heritage buildings, by crowding the immediate settings of Parliament House and Old Parliament House and by interrupting the visual cohesion between the heritage places that is currently afforded by the open views between them.</p> <p>The proposal <b>will affect the State heritage places with regards to views from the vantage points</b> within the precinct and medium range and long range views. The silhouette of the tower will fundamentally alter the skyline in medium to long range vistas from North Terrace, King William Street, King William Road, Elder Park and the northern side of the river.</p> <p>The demolition of a sizeable portion of the northern plaza and the underlying terrace level north of the existing Festival Drive alignment <b>will result in the irreversible loss of fabric</b> and design attributes of 'Considerable' and 'Exceptional' significance. Salvaging components of high significance is likely to involve difficult technical challenges due to the in-situ nature of the original construction. The extent to which this lost fabric and design attributes might be reinstated or reconstructed is not within the scope of this application. <b>There is therefore currently no proposal to mitigate this significant loss.</b></p>						

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<p>The demolition of the southern portion of the plaza and original underground carpark <b>affects fabric of relatively low significance</b> (noting that the exceptionally significant Hajek environmental sculpture has been dealt with under a separate application).</p> <p>Notwithstanding the height for the tower and retail buildings, <b>support is given for the architectural design of the development</b> which exhibits skill and finesse in its response to their localised context, with design attributes—such as the articulation of the retail building's form; the towers podium's scale, articulation and materiality relative to Parliament House and the Adelaide Railway Station; and the four-storey lobby that aligns with the northern face of Parliament House and the new garden — that exemplify a sophisticated and highly competent design sensibility.'</p>						
<b>ADELAIDE HIGH SCHOOL West Terrace ADELAIDE</b>	S10/15/2012 / 020/0021/12A	<b>Construct 3 level</b> learning centre, extend existing building and minor internal alterations.	15,000,000	State Heritage Place	Planning Consent Granted	13/12/2012
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Advice from Delegate for Minister <b>supported</b> with conditions</p>						
<b>BANK SA 97-105 King William Street ADELAIDE</b>	S10/30/2015 / 020/A042/15	Internal refurbishment, installation of gas metre enclosure to southern façade and conservation repairs to western façade.	10,350,000	State Heritage Place	Development Approval Granted	17/09/2015
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Data unavailable at this time.</p>						
<b>69-71 Light Square ADELAIDE</b>	S10/4/2012 / 020/005/12A	<b>Partial demolition of the state heritage listed former 'City Mission Hall'</b> and the construction of a mixed use development which incorporated a ground floor café, first floor gymnasium and a 15 level apartment building comprising 60 one (1), two (2) and three (3) bedroom apartments.	19,000,000	State Heritage Place	Planning Consent Granted	15/02/2013
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Advice from Delegate for Minister <b>supported</b> with conditions.</p> <p>The DPTI report to DAC contains the State heritage delegates advice: 'The advice focuses mainly on the relationship between the old and new buildings.'</p> <p>The revised design is an improvement, in that it reduces the visual weight of the tower's lower storeys. There is both an actual, physical reduction in the building's mass—with the open two-storey frame taking the place of the solid transfer structure and balconies—as well as a perceived reduction in that the open views through the frame take the eye back to the plane of the main glazed wall line as the predominant face of the building at levels 4 and 5.</p> <p>There is still the heaviness of the deep piers running from the fourth floor down to the roof line of the heritage building. It is recommended that be a reserved matter to find a better answer here. For instance, reducing the deep piers to columns of minimum dimensions determined by their structural function, and cantilevering the third floor balconies completely independently as tapered-edge slabs, would greatly lighten these levels.</p> <p>One of the dilemmas in this project concept is that the zone between ground level and the sixth floor is having to accommodate both the function of a backdrop to the heritage building and of a height transition between the strong four-storey height line of the Cobbs/Sands &amp; McDougall buildings and the higher Common Ground development. The proposal before us has three layers happening within this zone—the heritage building itself, the level perched above its roofline, and the two-level</p>						

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<p>transition above that. Conceptually, a completely neutral backdrop (eg glass curtain wall, green wall, perforated screen) for the whole height might have made it easier to work with the unusually small scale of the heritage building within the Light Square context.</p> <p>The very nature of the project—in perching a tall tower through the roof of a diminutive heritage building—is an inevitably uncomfortable one from the outset. There is compromise both in the integrity and context of the heritage place, and in the architectural design integrity of the new building. The project has evolved in a series of reluctant iterations that have gradually shifted the balance between the two. It has reached the middle ground of acceptability more or less, according to individual opinion, without being laudable.'</p>						
<b>Electra House 131-137 King William Street ADELAIDE</b>	S10/12/2012 / 020/0016/12A	<b>Refurbish existing building</b> and use as a licensed hotel including restoration work – Electra House	10,200,000	State Heritage Place	Extensio n of Time (12 Months)	24/01/2014
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.</p>						
<b>Post Office Lane ADELAIDE</b>	S10/32/2015 / 020/A047/15	Construction of a 22 storey office building including 3 levels of above ground car parking and plant room and loading dock (Stage 2 of the <b>GPO</b> redevelopment)	102,700,000	State Heritage Place	Planning Consent Granted	29/10/2015
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.</p>						
<b>Queen Adelaide Club 6 Stephens Place ADELAIDE</b>	S10/23/2014 / 020/0021/14A	<b>Partial demolition of the existing Queen Adelaide Club building</b> and integration of the remaining element within a new 21 level mixed-use building that comprises club facilities, ground floor retail, residential apartments and accommodation.	25,000,000	Local Heritage Place (City Significance) and State Heritage Places	Planning Consent Granted	20/05/2016
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Advice from Delegate for Minister (extract): 'The proposed development comprises partial demolition of a Local Heritage Place (2 storey) and construction of a 21 storey glazed tower adjacent to the above State heritage places, and within the vicinity of the following State heritage places. 175 North Terrace (former Liberal Club building); 170 North Terrace (former Shell House); 172 North Terrace (former Goldsbrough House); 165 North Terrace (Adelaide Club); and 2-12 King William Street (former Bank of New South Wales). Although there is some variance in building heights, the State places form a fairly consistent urban wall of 6-8 storeys built hard up to the street and side boundaries. The buildings maintain a consistent rhythm of vertical proportioned facades with a void-to-solid ratio generally greater than 50% solid. I consider that this is the established pattern that forms the context and setting of the immediately adjacent Gawler Chambers on which the proposed development has the potential for the greatest impact. State heritage impacts There are no direct physical impacts on a State heritage place other than the potential for construction activity to disturb the adjacent Gawler Chambers. The</p>						

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<p>proposed development is however a considerable change in the context and setting of the adjacent State places as it is substantially higher than that of the established pattern. Nonetheless consideration has been given in the proposed development to tempering the impact. In the composition of the tower, verticality is expressed by its overall proportion and by vertically proportioned glazing which responds to the proportions of the neighbouring buildings. The tower building acknowledges the height of the adjacent buildings by a variation in the materiality and texture up the rise of the tower building, with a more distinct break at about the same height as the adjacent Gawler Chambers parapet. This change in material and overlay of glass facades supports the legibility and continuity of the 6-8 storey building height along North Terrace and replaces a small scale building that is an anomaly in that pattern. Subject to the recommendation set out below, I consider its <b>heritage impact to be acceptable</b> for the following reason/s.</p> <p>There is no direct impact on the physical fabric of the various State listed places.</p> <p>The proposed tower design acknowledges and supports the pattern of adjacent building heights by changes in materials and glazing types.'</p> <p>The DPTI report to DAC stated 'Partial demolition is supported for the following reasons:</p> <ul style="list-style-type: none"> <li>• given the strategic direction of the Capital City Zone seeking a more active edge to North Terrace and improved street condition</li> <li>• the historical value largely associated with the presence of the club rather than the built fabric itself</li> <li>• the proposed reuse of an existing place for the express purpose described in its listing, the demolition is considered to be supportable.</li> </ul> <p>Further, the design response provides a contemporary approach to a culturally significant site and is a high quality addition to the North Terrace streetscape.'</p> <p>The applicant provided a professional heritage assessment.</p> <p>Regarding impact on local heritage, the report to DAC advised 'Council staff have provided ... no formal position has been offered with respect to the planning merits of the proposal or the impact on the local heritage items.'</p>						
<b>SECURITY HOUSE 233-236 North Terrace ADELAIDE</b>	S10/9/2015 / 020/A010/15	Internal alterations, external alterations including new roller doors to Austin Street and new disabled access and shop entrance and a two level addition at roof level to contain two dwellings.	11,000,000	Local Heritage Place	Planning Consent Granted	26/03/2015
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Council's heritage advisers supported the proposal:</p> <p>'This is a <b>really good adaptation</b> for this building. I support the creative solution for the new disabled access and the minor adaptation to create the new shop entrance at the eastern end (matching the west side). The rear vehicle access to the rear is appropriately located and handled with minimal impact up the fabric. The apartments will have virtually no visible impact from North Tce or Austin St and will only be visible over Scots Church. The design form is reasonable. I am fully supportive of this overall approach. It shows what can be achieved with an informed owner and architect.'</p>						
<b>ST MARYS DOMINICAN CONVENT 255-299 Franklin Street ADELAIDE</b>	S10/20/2017 / 020/A046/17	Demolition of existing gymnasium and construction of new multipurpose school building, alterations to existing heritage building, new entry pavilion including fencing, landscaping and associated site works.	12,025,480	State Heritage Place	Development Approval Granted	15/12/2017
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Data unavailable at this time.</p>						



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<b>11-19 Austin Street ADELAIDE</b>	S10/22/2015 / 020/A002/15	Demolition of existing structure excluding facade of local heritage item construct thirty(30) storey mixed use building and five(5) level basement car parking and services.	50,000,000	Check	Planning Consent Granted	12/02/2015
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						
<b>111-119 Angas Street ADELAIDE</b>	S10/27/2015 / 020/A039/15	To demolish all existing structures and: a) Construct a 13 storey hospital with allied health tenancies, retail and 3 level basement b) Construct an 8 storey multi level car park with retail and office tenancies c) Install advertisements and associated site works	115,000,000	Adjacent Local Heritage Place	Planning Consent Granted	22/10/2015
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						
<b>126 Wright Street ADELAIDE</b>	S10/9/2017 / 020/A025/17	Demolition of existing buildings and structures, construction of an eighteen storey mixed use building comprising of commercial tenancy, residential apartments, car parking, landscaping and associated site works.	11,895,000	Adjacent Local Heritage Place	Planning Consent Granted	5/04/2018
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Council's local heritage staff comments: 'The following areas of the proposed development are considered <b>detrimental to the heritage value</b> or context of the adjacent Local Heritage Places: The setback from the street boundary is less than the (nominal) 4 metre setback to the front wall of the adjoining Local Heritage Place and fails to address the nature of built form along Wright Street or the width of the street itself. The built form of the proposed podium will consequently still dominate the streetscape, particularly as viewed from the east, in front of and over the LHPs. There is a real lack of any significant contextual analysis (with the exception of recent multi-storey development) and particularly that of the south side of Wright Street. The design response is therefore weakened and would appear to address the excessive height only. The 4 storey podium has no contextual basis. The materials selection, within the context of Wright Street, fails to address the fine grain nature of the predominant built forms. The over development of the site results in a limited design response for the east and west facades, with limited opportunity to explore an exemplary design response as called for by the Desired Future Character.'						
<b>16-20 Bentham Street ADELAIDE</b>	S10/21/2018 / 020/A033/18	Construction of an 18 storey building comprising tourist accommodation, hospitality facilities and associated landscaping.	25,000,000	Adjacent Local Heritage Place	Planning Consent Granted	28/06/2018
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Council Local heritage comments:						

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<p>'I have considered the proposed development including the supporting Heritage Impact Statement prepared by Bruce Harry &amp; Associates.</p> <p>In short, I <b>concur with the heritage assessment</b>. The physical separation of the proposed building from the adjacent Heritage Places will result in no significant physical impact upon their respective heritage value. In addition the use of a podium design which incorporates vertical articulation and the selection of compatible materials will assist with reinforcing the existing townscape character of Bentham Street.'</p>						
<b>162-178 Frome Street ADELAIDE</b>	S10/26/2014 / 020/0031/14	Demolition of existing buildings and structures and construction of a commercial building comprising ground floor retail, one level of above ground car parking (Level 1) and two levels of commercial office (Levels 2 & 3) together with related site works.	15,000,000	Local Heritage Place	Planning Consent Granted	27/11/2014
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Local Heritage Place is adjacent to the eastern side.</p> <p>Council's heritage advisers advice was 'The proposed development <b>will not directly impact</b> upon the heritage value of the adjacent Local Heritage Place.'</p>						
<b>171-207 Gouger St ADELAIDE</b>	S10/30/2012 / 020/0034/12A	Mixed use development comprising residential, commercial, student accommodation, hotel and retail land uses with landscaping and basement car parking	80,000,000	Adjacent Local Heritage Place	Planning Consent Granted	28/03/2013
<p>Adjacent local place.</p> <p>Heritage adviser comments in Council Development Assessment Panel report (COCO 2013/837):</p> <p>'Council's Heritage Architect was re-consulted with the amended plans. While a number of positive comments were made in relation to the amendments, the massing, siting and design of the student accommodation building is not supported in relation to the heritage listed cottages on Claxton Street. The comments are summarised as follows:</p> <p><b>The amendments are generally positive</b></p> <p>The reduced podium height and the introduction of masonry on the corner of Gouger and Claxton Streets provides for an easier transition to the single storey cottages</p> <p>The repositioning of the tower eastward and the <i>reduction in mass lessens the visual bulk</i> and dominance of the tower adjacent to the cottages</p> <p>Moving the student accommodation tower 4m north <b>lessens its dominance</b> over the rear of the cottages</p> <p>The massing and repetitive nature of the floor plans of the student accommodation tower is still at odds with the massing and fine grain building proportions of the cottages (high solid to void ratio, pitched roofs, verandahs, narrow fronted facades which are similar but with individual differences)</p> <p>In summary, the <b>overall massing, siting and repetitive detailing</b> of the student accommodation tower <b>is out of context with the character and heritage value of Claxton Street'</b></p>						
<b>200-206 East Terrace ADELAIDE</b>	S10/24/2014 / 020/0009/14A	Demolish existing office building and construct residential flat building with basement car parking	40,000,000	Adjacent State Heritage Places	Planning Consent Granted	26/06/2014
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Adjacent State heritage place.</p> <p>Advice from Delegate for Minister DID support.</p> <p>'The proposed development does not involve any changes to the two State heritage places, or any work within their boundaries. Subject to appropriate management of ground vibrations and retention of structural support during excavation and construction, the proposed development will not directly affect either State heritage place.</p>						

## Attachment B – Table of Developments valued over \$10M, Granted Consent and impacting Heritage Places in City of Adelaide 2012–2018

Address	Council / SCAP No.	Description of Proposed Development	\$ Value of Development	Heritage Place	Decision	Decision Date
<p>The subject site sits within a hybrid, mostly contemporary, built townscape. There is no heritage imperative for the proposed development to adopt historic design motifs or construction materials in its architectural composition</p> <p>The physical separation of the proposed development from the State heritage places, in conjunction with the massing and modulation of the proposed built form, establishes a satisfactory visual relationship with the State heritage places. The massing, building propositions and façade detailing will provide a suitable interface with the State heritage places</p> <p>The proposed development <b>will not affect the identified heritage values of the two State heritage places</b> their historical context or their built form contribution to their locality.'</p>						
<b>22-40 Blyth Street ADELAIDE</b>	S10/19/2015 / 020/A032/15	Demolish existing building and construct a 245 room hotel and retail.	32,450,000	Adjacent Local Heritage Place	Planning Consent Granted	11/06/2015
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Data unavailable at this time</p>						
<b>248-253 East Terrace ADELAIDE</b>	S10/2/2016 / 020/A094/15	Demolition of existing building and construction of an eight storey residential building with ground and basement car parking and removal of one significant tree.	15,000,000	Adjacent Local Heritage Place	Planning Consent Granted	23/06/2016
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Data unavailable at this time</p>						
<b>318 South Terrace ADELAIDE</b>	S10/10/2012 / 020/0014/12A	<b>Construction of an eight level hotel building (with associated demolition and restoration works to a local heritage place).</b>	15,000,000	Local Heritage Place	Planning Consent Granted	22/03/2013
<p>[Heritage Advice received as part of Assessment Process – BOLD added by CoA]</p> <p>Applicants proposal supported by a Bruce Harry heritage impact statement.</p> <p>The DPTI report to DAC of December 2012 stated: 'The Adelaide City Council DAP considered the matter at its meeting of 12 August 2012. The Council did not provide a formal planning comment, on the basis that "The Development Assessment Panel is not in a position to provide comments due to insufficient information included in documents referred to the Council". However the Council did receive a comprehensive staff report on the proposal. This report noted the following internal council advice on the proposal: § The <b>Council's heritage advisor supported the restoration and refurbishment of Davaar House</b>, including the glazed connection with the new hotel building, but <b>concerns were raised about the proposed eight storey height and its visual dominance.</b>'</p> <p>The DPTI report to DAC of December 2012 stated 'The findings of the Heritage Impact Statement are supported. The proposed development is seen to be consistent with the intent of the Development Plan, in that it does conserve and restore the principal heritage elements of Davaar House (indeed these elements are "showcased" with the removal of previous additions and alterations and the opening-up of the eastern and southern facades to public view). The <b>heritage concerns raised in the Council's report, most notably relating to the proposed height of the new building, are not shared by this report</b> (noting previous comments on catalyst sites). The "jewel box" design metaphor outlined in the applicant's Planning Statement is an appropriate one, with the "curved face of the new development sitting behind and forming a soft enclosure to heritage building", which at the proposed height allows the significance of Davaar House to be commendably reinforced. It is a simple but effective backdrop, whilst at the same time providing a notable gateway element into the city.'</p> <p>The DAC consent was conditional on preparation of a conservation management plan for the alterations to Davaar House, with the management plan to be prepared in consultation with the City of Adelaide. This management plan was prepared.</p>						

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<b>318 South Terrace ADELAIDE</b>	S10/13/2015 / 020/A054/14	Construction of a 14 level building (including terrace level), comprising 10 levels of apartments, ground level cafe/restaurant, two levels of Sleep Apnoea Medical Suites and basement and subbasement car parking. <b>Restoration of existing local heritage listed building (including demolition of non-historic additions to this building)</b> to be used for consulting rooms.	19,000,000	Local Heritage Place	Planning Consent Granted	26/02/2015
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time that is specific to this development. A development application (020/A054/14 V1) to vary the planning consent was lodged and the DPTI report to DAC references the Bruce Harry reports from the 8 level consent.						
<b>41-47 Currie Street ADELAIDE</b>	S10/24/2013 / 020/0026/13A	Construct residential apartment tower over existing car parking building, refurbish existing office building reconfigure ground floor tenancies, upgrade facade and construct outdoor dining terrace.	15,000,000	State Heritage Place	Planning Consent Granted	14/11/2013
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						
<b>42-56 Franklin Street ADELAIDE</b>	S10/13/2018 / 020/A023/18	Construction of a twenty one (21) storey office building comprising one (1) basement level, ground level retail tenancy and 21,000 square metres of office accommodation over upper levels.	60,000,000	Adjacent Local Heritage Place (Townscape)	Planning Consent Granted	9/08/2018
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						
<b>76-80 Wright Street ADELAIDE</b>	S10/32/2017 / 020/A059/17	Construction of an 18 storey building with basement car parking, <b>retention and reuse original fabric of Hotel Wright Street</b> , hotel at ground first floors with a roof top terrace, atrium providing pedestrian link between Compton and Wright Street being licensed as hotel: retail tenancy ground floor: fifteen (15) levels offices: two (2) storey penthouses levels 16 and 17.	57,000,000	Local Heritage Place	Planning Consent Granted	23/11/2017
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						
<b>89-109 Gray Street ADELAIDE</b>	S10/26/2017 / 020/A053/17	Staged construction of student accommodation building of ground and 16 upper floors with 2 shops and ancillary facilities.	52,000,000	Adjacent Local Heritage Place	Planning Consent Granted	10/11/2017
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time						

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<b>9-10 North Terrace ADELAIDE</b>	S10/21/2013 / 020/0024/13A	Mixed use development including 13 level hotel building fronting West Terrace and 16 level office building with basement fronting North Terrace with ancillary car parking.	120,000,000	State Heritage Place		
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						
<b>BOHEM 150-160 Wright Street ADELAIDE</b>	S10/8/2015 / 020/0045/14A	Construction of 22 level residential tower with ground floor commercial and associated car parking	26,000,000	Local Heritage Place	Planning Consent Granted	13/11/2014
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Adjacent Local heritage place Data unavailable at this time						
<b>BURKE BUILDING 228-230 Wakefield Street ADELAIDE</b>	S10/7/2017 / 020/A022/17	Construction of a three storey building, fencing, landscaping and ancillary works.	11,380,000	State Heritage Place	Development Approval Granted	25/10/2017
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						
<b>DWELL ADELAIDE 12-18 Synagogue Place ADELAIDE</b>	S10/22/2016 / 020/A033/16	Demolition of existing structures and construction of a multi-level mixed use development comprising retail and commercial uses, hotel, student accommodation, residential and serviced apartments, including car parking, landscaping and site works.	100,000,000	Adjacent Local Heritage Place	Planning Consent Granted	14/12/2016
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time						
<b>FS HONE WING/COBALT WING North Terrace ADELAIDE</b>	S10/21/2017 / 020/L050/17	Stage 1 demolition of the Old Royal Adelaide Hospital (Hone, Cobalt and East Wings)	20,000,000	State Heritage Places	Development Approval Granted	7/11/2017
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						

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<b>Roxies 188 Grenfell Street ADELAIDE</b>	S10/5/2013 / 020/0010/13A	Demolish existing building and construct 13 level residential/serviced apartment building with basement carparking, ground floor commercial, office tenancy on 1st floor and apartments above - 90 apartments.	17,500,000	Adjacent Local Heritage Place	Extension of Time Other	23/05/2014
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time						
<b>Skycity Adelaide North Terrace ADELAIDE</b>	S10/26/2013 / 020/0027/13A	Internal and external alterations to Ground and 1st Floor of Skycity Casino.	11,400,000	State Heritage Place	Planning Consent Granted	17/02/2014
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] This package of works <b>supported</b>						
<b>SKYCITY ADELAIDE CASINO North Terrace ADELAIDE</b>	S10/56/2015 / 020/A084/15	Construct 9 level addition to the north of the existing casino building containing hotel entry, gaming and cafes (Plaza level) gaming and restaurants (Levels 1 and 2), hotel rooms and entry foyer, (Levels 3-7), gaming salons and balcony (Level 8), roof plant and future rooftop bar and restaurant (Level 9) as well <b>demolition works to the northern portion of the existing heritage building</b>	175,400,000	State Heritage Place	Planning Consent Granted	21/01/2016
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Data unavailable at this time.						
<b>ST ANDREWS HOSPITAL 341-364 South Terrace ADELAIDE</b>	S10/47/2015 / 020/A068/15	Expansion of existing hospital.	28,660,000	State Heritage Place	Planning Consent Granted	8/10/2015
[Heritage Advice received as part of Assessment Process – BOLD added by CoA] Prelodgement agreement; State heritage <b>support</b> with conditions.						

