

SA Heritage Register

Submission form

South Australian
HERITAGE COUNCIL

South Australian Heritage Council

Submission on whether the entry of the Place **Former Sisalkraft Factory Complex** should be confirmed in the South Australian Heritage Register

A place is eligible for entry in the Heritage Register if it meets one or more of the criteria in Section 16(1) of the *Heritage Places Act 1993* (Act). Using the table below, please explain why you believe the place should or should not be entered into the Register, using the said criteria. The South Australian Heritage Council invites your submission regarding the entry of this place. For help in making a submission, please refer to the *Guidelines for Interpreting State Heritage Criteria (Attachment E)* and also available online: [Guidelines-for-Interpreting-State-Heritage-Criteria-2024.pdf](#)

Criteria

Criteria under the <i>Heritage Places Act 1993</i> , section 16(1)	Provide evidence or other information to support your submission
a) it demonstrates important aspects of the evolution or pattern of the State's history	REFER ATTACHED OBJECTION RESPONSE.
b) it has rare, uncommon or endangered qualities that are of cultural significance	REFER ATTACHED OBJECTION RESPONSE.

<p>c) it may yield information that will contribute to an understanding of the State's history, including its natural history</p>	<p>REFER ATTACHED</p> <p>OBJECTION RESPONSE.</p>
<p>d) it is an outstanding representative of a particular class of places of cultural significance</p>	<p>REFER ATTACHED</p> <p>OBJECTION RESPONSE.</p>
<p>e) it demonstrates a high degree of creative, aesthetic or technical accomplishment or is an outstanding representative of particular construction techniques or design characteristics</p>	<p>REFER ATTACHED</p> <p>OBJECTION RESPONSE.</p>
<p>f) it has strong cultural or spiritual associations for the community or a group within it</p>	<p>REFER ATTACHED</p> <p>OBJECTION RESPONSE.</p>

(g) it has a special association with the life or work of a person or organisation or an event of historical importance

REFER ATTACHED

OBJECTION RESPONDED

Declaration

The South Australian Heritage Council is committed to transparency in relation to the listing process and wishes to enhance public confidence in the nomination, listing and decision-making process. The Council's policy is to make nominations for State heritage listing and submissions on provisional entries publicly available via webpage or to interested parties. The Council will adhere to the Privacy Principles and your name and personal details will not be released.

I/We

wish to make a written representation regarding the provisional entry of **Former Sisalkraft Factory Complex**. The Information I have provided is correct to my knowledge.

☐ I support the confirmation of this provisional entry.

☒ I do not support the confirmation of this provisional entry.

I do / ~~not~~ wish to appear personally before the Council to make oral representations.

Signature:

Date: 17TH AUGUST 2025

Please attach any relevant documents and be aware that a heritage officer may contact you to discuss your submission.

Please provide your contact details here:

Phone:

Email

Address:

This form must be received by 5pm on **15 August 2025**.

Please return completed submission form to the

Board and Policy Officer, South Australian Heritage Council

Via email: **DEWHeritage@sa.gov.au**

Or via post: **GPO Box 1047, Adelaide SA 5001**

Executive Summary

This document outlines the owner's objection to the provisional entry of the property situated and known as 356 Torrens Road, Kilkenny SA 5009, into the South Australian Heritage Register under Section 16 (1) of the Heritage Places Act 1993. The objection challenges the claims made by the South Australian Heritage Council regarding the property's significance based on criteria (d) and (e), which assert that the property is "an outstanding representative of a particular class of culturally significant places" and "demonstrates a high degree of creative, aesthetic, or technical accomplishment".

Accordingly, this objection is summarised as :

1. **Ordinary Design and Materials:** The property, constructed in 1956, is a poorly designed, average structure made of common materials such as concrete blocks, asbestos sheeting, and iron roofing. These materials and design elements are neither unique nor exceptional.
2. **Lack of Heritage Significance:** The office and workshop are ordinary in design, with unattractive facades, ineffective layouts, and outdated poorly designed features. The property does not exhibit any rare or uncommon qualities, nor does it contribute significantly to the understanding of South Australia's history.
3. **Disputed Claims of Architectural Merit:** The submission's description of the property as an example of "Postwar International Style architecture and Modernist design" is refuted. The parabolic arch, while unusual, is in poor condition and does not elevate the property to a level of heritage significance.
4. **Comparison to Similar Properties:** The objection highlights the existence of numerous similar 1950's buildings in South Australia, arguing that the property is not unique or exemplary within this context.
5. **Condition and Preservation:** The property is in poor condition, with issues such as concrete cancer, ineffective sun-control devices, and outdated amenities. It has not been well-preserved and does not meet the criteria for heritage listing.
6. **Bias and Exaggeration in Submission:** The objection criticises the submission for using exaggerated and colourful language to describe the property, which does not align with its actual state or significance.

Objection Response :

The following confirms the owner's objection to the Heritage Council considerations that the subject property meets the criteria of significance for the Provisional Entry in the South Australian Heritage Register, under Section 16(1) of the Heritage Places Act 1993. Throughout the representative submission the terminology has been repetitively duplicated. This objection response, to the submission, is similar in repetitive duplication to address the various items listed.

Attachment A – Notice of Provisional entry in the South Australian Heritage Register :

The South Australian Heritage Council considers items "d" and "e" significant, in

"(d) it is an outstanding representative of a particular class of places of culture significant", and

"(e) it demonstrates a high degree of creative aesthetic or technical accomplishment or is an outstanding representative of particular construction techniques or design characteristics."

Accordingly, and working through the Submission, the owners wish to comment as follows:

(d) The relevance of this building being "a representative of a particular class or place of cultural significance" is incorrect, more particularly described as :

- the Office - constructed of concrete blocks, with rusted jammed unopenable metal framed windows, some painted out, many with cracked glass panes, the lower panes replaced, prior to ownership, with asbestos sheeting, together with flat iron roofing. Nothing realistically outstanding. *Therefore nothing to do with Heritage.*
- the Workshop – constructed of concrete blocks, corrugated (deep 6) asbestos sheeting (now prohibited as a building product), with skylight windows, some cracked and/ or clad. Nothing realistically outstanding. *Therefore nothing to do with Heritage.*

(e) The relevance of this building "demonstrates a high degree of creative aesthetic or technical accomplishment or is an outstanding representative of particular construction techniques or design characteristics", is incorrect :

- the Office – with a flat roof and concrete blockwork has an unattractive ordinary facade and shows no relevance to a structure worthy of heritage consideration. The structure does not demonstrate "a high degree of creative aesthetic or technical accomplishment or an outstanding representative of particular construction techniques or design characteristics". The structure is not unique. It is simply a common, very plain concrete block ordinary building and shows no relevance to a structure worthy of heritage consideration. *Nothing to do with Heritage.*
- the Workshop – of an ordinary design, constructed of concrete blocks, corrugated (deep 6) asbestos sheeting (now prohibited as a building product), has supporting internal columns restricting clear-span activities, therefore reducing its overall usefulness. This poor design does not demonstrate "a high degree of creative aesthetic or technical accomplishment or an outstanding representative of particular construction techniques or design characteristics". The gable truss roof pattern and use of concrete blocks are typical of industrial buildings from this period and do not demonstrate exceptional technical or creative accomplishment. The structure is not unique. It is simply a common, very plain concrete block ordinary building and shows no relevance to a structure worthy of heritage consideration. *Nothing to do with Heritage.*

Attachment B- Summary of State Heritage Place :

The statement of Heritage significance is incorrect.

The premises was in fact constructed in 1956, potentially considered modern as at the date of its construction but in reality, is a poorly designed average unimaginative structure, with ordinary concrete block work, still commonly used in buildings today, however with now prohibited asbestos containing products, used throughout the building.

The building is described in your Submission as a "rectilinear shape, structural frame and curtain walls", my client feels colourful words describing an ordinary structure. The structure of the building most definitely does not demonstrate any (form of) "high degree of creative achievement through the holistic application of Modernist design", nor is it "an outstanding representative of a mid-twentieth century factory", and doesn't "exhibits many of the key attributes typical of factories erected during the industrialisation of South Australia c 1936-1965". The structure is one of many common builds currently erected in the western districts. The description that the "Complex is also an outstanding example of post war International Architecture" ridiculous. Again, exceptionally colourful words depicting something in fact, which does not actually exist.

Refer to the previous comments made in the Attachment A items "d" and "e" above regarding what actually exists.

It does indeed have a "parabolic Arch". This structure is in poor condition with concrete cancer, regularly painted with an attempt to keep this structure intact and from deteriorating further.

Relevant criteria (under Section 16 of the Heritage Places Act 1993)

(d) "it is an outstanding representative of a particular class of place of cultural significance":

There are a large number of similar 1950's builds to the subject property. This is not a unique structure, it is simply an average build of a poor design, using ordinary building materials in its construction.

Principle characteristics of common mid-century factories:

- The property is not "Modernist or of International Style", not offering "architectural elements". The office workshop is constructed of ordinary materials, particularly concrete block walling, poor quality windows and Asbestos roofing. Colourful words embellishing something that in reality does not exist.
- The office is not of a "Bespoke design", nor "stand alone". The ineffective design offers small closed office areas. Colourful words embellishing something that in reality does not exist.
- The property does not "standout architecturally". Totally untrue. It is a common concrete block building. Your representative suggesting "landmark signage", which my client is bemused, as there is none, "the artwork", not evident "and / or landscaping" which is grass and common crazy paving. There is an old metal flag pole in an exceptionally poor unusable condition. There is an exceptionally shallow (approximately 150mm) water feature which does not retain any water. Colourful words embellishing something that in reality does not exist.
- The property does not display "standalone or integrated showrooms". The original showroom has now been partitioned. Colourful words embellishing something that in reality does not exist.
- The property does not "demonstrate stand alone or integrated drafting, engineering or designed office". Repeating earlier descriptions, the offices are small, with inadequate windows. Colourful words embellishing something that in reality does not exist.

- The workshop does not “display effective usable manufacturing and or assembly showrooms” due to the excessive number of structural supporting columns within this workshop area. This area has cement and bitumen flooring, in poor condition. There are no “showrooms” within this area, and the suggested showroom in the office area small. Colourful words embellishing something that in reality does not exist.
- The property does not demonstrate “Corporate Landscaping for staff and or customer usage, including outdoor recreation and leisure areas”. This area has crazy paving with missing supporting cement holding these pavers in place. There is the remains of a shallow water feature that in poor condition and not able to hold water. Colourful words embellishing something that in reality does not exist.
- The “Staff amenities” are poor, including an exceptionally small open kitchen area, with male and female facilities – both having only one enclosed cubicle. This was poorly designed in its day, and totally outdated and ineffective for these modern times. Colourful words embellishing something that in reality does not exist.
- There is a car parking area at the front, with internally located outdoor parking between the offices and the workshop. These areas are bitumen and concrete.

Therefore, other than the Arch, which is in poor condition, due to the evident concrete cancer, the property does not demonstrate the characteristics as suggested in item (d) as “Relevant Criteria” and certainly does not warrant the proposed Heritage consideration. As previously suggested, the description does not realistically depict what actually exists.

The complex has not been “well preserved”, in fact is in poor condition, other than new modern timber flooring installed and a number of the walls repainted. The representative description depicting what is, is in fact not correct, an embellishment of the actual fact.

The property is a common concrete block building, poorly designed, as previously described, The property has actually been described by many as “ugly” and “an eyesore”.

(e) It demonstrates a high degree of creative, aesthetic or technical accomplishment or is an outstanding representative of particular construction techniques or design characteristics:

The property is not “an outstanding representative of Postwar International architecture and demonstrates a high degree of creative accomplishment”, and considered by the owners, ridiculous to even conceive this suggestion.

- “Cubiform (rectilinear) overall shape” – most definitely offices of shoe box proportions and a flat roof. How does such a common design of this period, with a large number of similar properties, represent something of a heritage nature ? It in fact doesn't.
- “Structural frame expressed through steel beams and alternating gable trusses on the workshop roof that forms rhomboid skylight (workshop)”. This is a common construction of numerous similar properties, certainly not unique by any means and therefore not up for heritage consideration.
- “Curtain walls built of Besser blocks” (within the workshop) are not unique even in today's construction and “glass window panels” (within the office) how is this relevant. How does something of a common structure like this be considered heritage. It doesn't.
- “Large areas of glass expressed as glass window panels (office) overhung at the south front elevation of the office”. This no longer actually exists and therefore not an item to be considered.
- “Plain smooth wall surfaces built from Besser Block masonry and glassed panels”. Concrete (Besser) block is not smooth, in fact rough plus many windows, 50% of these, covered over with asbestos outside and gyprock panels inside, most unable to be opened. Accordingly, this should not be considered as a heritage item.
- “External sun-controlled devices”. These welded metal plates are ineffective. This item should not be up for heritage consideration.
- “Contrasting nonrectangular shape expressed through the Parabolic Arch”. Previously commented on. This Arch is in poor condition but regularly painted to maintain this structure. The only item somewhat different to other similar properties.
- “Cantilever expressed by the end of the canopy”. Yes, this timber and steel structure again is in poor condition, but why would a cantilever structure, such as this, be considered heritage. It is a simple verandah. Therefore not to be considered.

This building definitely does not demonstrate “a high degree of creative accomplishment”, as alleged by the submission “through, its application of Modernist design ideas and elements to a factory complex”. This has previously been adequately disputed and to repeat something, as has been repeated constantly throughout the submission, simply repetitive and depicting something that is not factual.

Describing the property as “holistic” is an over exaggeration. The design totally ineffective in usable spaces, certainly not unique, due to the large number of similar properties. The history of the short-term tenancies clearly demonstrate this.

The submission attempts to embellish something which is not.

Pages 9-39 depicts the history of buildings constructed during the Mid-Twentieth Century 1930-1960, the vast majority of (not) comparable buildings are totally irrelevant to 356 Torrens Road, Kilkenny and therefore should not be used as a comparison, attempting to create a description which isn't factual.

It is considered by my client that the cut and paste commentary in the submission has been adequately commented on previously in this objection to the subject property being listed for provisional Heritage purposes.

The history of other "Mid-Twentieth Century International Style Architecture" is irrelevant and to even conceive the idea that the subject property is of an international comparison, again an embellishment, irrelevant and should not to be considered.

Attachment C – Please refer to the contents of this letter.

Attachment D – Fact Sheet – information only.

Attachment E – Guidelines – not included in the attachments sent. My client has in fact Googled this and respond accordingly :

From the five main criterion guidelines, the property falls short of relevance, more particularly:

Criterion "(a) Demonstrates important aspects of the evolution or pattern of the States history".

This office workshop is one of numerous properties built in the 1950's, an era of low grade building construction with ordinary building materials, more particularly cheap concrete block, a common brick, being used even today, metal framed poor quality windows, flat iron and asbestos roofing.

Criterion "(b) Has rare, uncommon, or endangered qualities of cultural significance".

The building is common with other 1950's properties within the near city western localities. It is not rare, nor unique, as the same materials are used today, however the Asbestos situations within the building is now a prohibited materials used in construction.

Criterion "(c) May yield information contributing to an understanding of the state's history".

With numerous other similar properties it is difficult to understand how this has relevance yielding information to the state's history, certainly with its ordinary construction.

Criterion "(d) Is an outstanding representative of a particular class of places of cultural significance".

The property has no relevance of a particular class of places of cultural significance, certainly in relation to cultures pertaining to any Aboriginal or European significance.

While the site is an example of a 1950's office workshop, it is most definitely not something unique or rare. Many similar factories from this period exist in South Australia, and the subject building does not demonstrate features that are significantly more representative or exemplary to other comparable 1950's builds.

Criterion "(e) Demonstrates a high degree of creative, aesthetic, or technical accomplishment".

Other than the unusual Arch, at the front of the property, which stands in poor condition, it is difficult to understand any degree of creative, aesthetic or technical construction. The offices, divided into eight small office areas, with a workshop offering limited serviceable areas due to the roof supporting columns, reducing any free serviceable clear span working areas. This therefore clearly demonstrates the lack of creativity, clearly no aesthetic consideration and certainly no technical accomplishment.

The architectural features of the site are not groundbreaking or unique enough to warrant a State Heritage listing. The Modernist design elements, such as the parabolic arch, is interesting, but not exceptional within the broader context of Postwar International Style architecture.

In summary, the submission representative is totally bias, unfounded and using colourful embellishing words depicting something which does, in fact, not realistically exists. The property is not unique in any form, in fact common as demonstrated with the number of other similar 1950's buildings within the near city western districts.

It is noted a substantial amount of referencing, many situations not depicting actual page numbers of the referenced material.

I confirm that [REDACTED] object to the proposal of this provisional entry into the State Heritage listing and requests that same is removed.

We, [REDACTED] [REDACTED] [REDACTED] concur with the comments made in this objection noted herein.

Dated 4th day of August, 2025

[REDACTED]

[REDACTED]