Our Ref:

BY E-MAIL <u>DEWHeritage@sa.gov.au</u>

26 September 2025

South Australian Heritage Council

Dear Sir/Madam

Former Malcolm Redi's Emporium, 187-195 Rundle Street Adelaide SA ('property')

We act for the property.

In accordance with the terms of agreement between our client and the terms, this is a formal response to the Heritage Council's Assessment Report for the listing of 187-195 Rundle Street, Adelaide (the Malcolm Reid Building) pursuant to Section 17(4) of the Heritage Places Act.

Our client strongly objects to the Confirmation of the Provisional listing of the building and this objection is supported by the expert opinion of a copy of which is attached and is included as a part of our formal objection.

When considering the matter, it is imperative in our submission, that all members the Council are aware of the circumstances and background leading up to the provisional listing which has placed our client in this situation.

The commencement of the listing process commenced after a lengthy hearing in the ERD Court in relation to the removal of the Sign on the building and before any decision by the Court. The sign is not the subject of the current proposed listing.

On 12 December 2024, the Council held an in-camera meeting to discuss the property. The unredacted parts of those minutes provided to our client state that "The Council gave consideration to the listing of the entire property given the integrity of heritage fabric within. The Council considered doing an assessment of the entire building given only the façade is listed. Council noted that the interior is likely to have significant heritage fabric and requested an assessment to occur."

On 15 January 2025 emailed the Chair of the Council recommending that under delegation from the Council, the Chair should, as an emergency, provisionally enter the building in the Register under sec. 17(2)(b) of the Act to protect the place while it is being assessed as the place is likely to meet s.16 criteria (a)and (b).

On the same date the Chair emailed her that she was happy to provisionally list under her delegation, under criteria (a)and (b).

Included in that email of the 15 December 2025 was the statement "Given recent

experiences with the owner and the potential for works to take place that would potentially result in the loss of significant fabric."

The events set out above and the statements made to justify the provisional listing were in circumstances where there was no development proposed other than the removal of the sign which was awaiting decision and where the internal records show that our client looked after the State heritage Place and was a "Heritage Advocate". The reference to "an emergency" is not only unjustified ,but also wholly misplaced. This is coupled with the reference to "recent experiences with the owner". The only experiences were involved with removal of the sign, and which was the subject of an appeal to the Court.". Our client is rightly concerned that the manner in which the matter arose and then pursued is not only highly inappropriate, but most prejudicial and casts doubt on the integrity of the process.

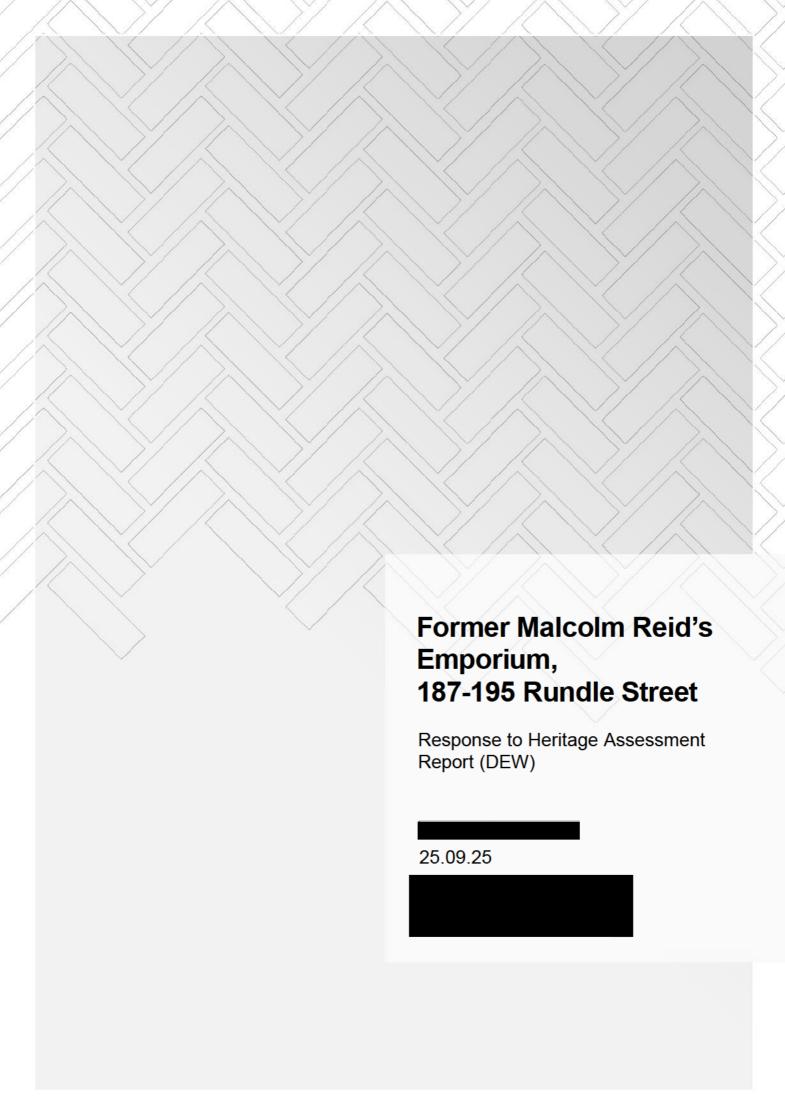
The attached expert report speaks for itself to the lack of merit justifying a confirmation of the listing.

In our submission, the acknowledgment that the basis from the beginning of the process relates to the internal fabric of the building, does not warrant the listing of the entire building as a place on the register and the provisional listing should **not** be confirmed. This is reinforced by the specific rejection of the building on previous occasions as set out in the attached expert report. Given the extent to which the internal fabric of the building has been significantly changed over the years, which provided the basis for rejection in previous assessments, and the fact that its current state bears no resemblance to its historical original state, it is difficult to see how a permanent listing could conceivably be justified. The Assessment report provided to the Council extensively canvasses the history of the Malcolm Reid firm and its operations and activities over the years but fails to cogently identify the relevance of the building to the criteria relied upon under section 17 of the Act.

It has been agreed that our client will be given an opportunity to speak to the objection and submission at the meeting of the council on the 30 October 2025.

Our client will be represented by that meeting. We understand from your guidelines that it is the practice of the Council to limit speakers to 5 minutes. Given the circumstances in this case, we request that our client is not limited in this way. Will you please confirm that will not be limited to 5 minutes to put the case for our client. Thank you.				
Please direct any queries regarding this matter to the writer.				
Yours faithfully				

Enc.



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1.0 Introduction

On 15 January 2025 the Chair of the South Australian Heritage Council (SAHC) provisionally entered the former Malcolm Reid's Emporium, 187-195 Rundle Street Adelaide (the Site) on the State Heritage Register under s17(2)(b) of the *Heritage Places Act 1993* (SA). Minutes of the SAHC meeting dated 14 August 2025 note this provisional listing was "to protect the place while it is assessed as it is likely to meet s16 criteria (a) and (b) of the Act."

At the time provisional listing the Site was subject to an appeal before the Environment Resources and Development Court relating to the refusal of Planning Consent for the removal of the neon sign box from its street façade.

In August 2025 Heritage South Australia, Department for Environment and Water (DEW), prepared a Heritage Assessment report to support the January 2025 s17(2)(b) provisional listing. DEW's report recommended that the place fulfilled the following criterion under Section 16(1) of the *Heritage Places Act* 1993 (SA) (Heritage South Australia 2025:8-14):

- **Criterion (a):** it demonstrates important aspects of the evolution or pattern of the State's history
- **Criterion (b):** it has rare, uncommon or endangered qualities that are of cultural significance, <u>and</u>
- **Criterion (g):** it has a special association with the life or work of a person or organisation or an event of historical importance.

has been engaged by the property owner of the Site to review DEW's Heritage Assessment report and determine whether confirmation of the State Heritage listing is warranted.

In undertaking this review the following is noted:

- The Site is already subject to a State Heritage listing, made in 1986:
 Malcolm Reid's Emporium (Facade) ID 11579
- We are advised that in March 2025 the Crown wrote to the property owner on behalf of the SAHC to advise: 'The Council does not intend that this provisional entry — or, if confirmed, the subsequent confirmed entry — include that sign'.

was founded in 1964 and has established itself over the last 50 years as one of South Australia's leading practices specialising in the provision of heritage architectural services, and design in a heritage context.

provide expertise in the following specialist heritage fields:

- Heritage Conservation
- Heritage Assessment and Impact Assessment
- Heritage Advisory Services
- Heritage Policy Development
- Condition and Compliance Audits
- Adaptive Reuse
- Conservation Management Plans

- Expert Witnessing
- Professional Desktop Historical Archaeological Services.

Our expertise extends across the full range of historic character and heritage listings to include:

- Historic Character
- Local Heritage Places
- State Heritage Places
- State Heritage Areas
- Commonwealth Heritage Places
- National Heritage Places.

This report has been prepared by the practice's director, is one of the State's leading and most respected heritage architects, with over 30 years' experience in undertaking heritage assessments of this nature. served on the South Australian Heritage Council for 10 years between 2011 and 2021, and is well versed with the assessment and listing processes.

2.0 1986 State Heritage Listing

The former Malcolm Reid Emporium was already subject to a State Heritage listing prior to its s17(2)(b) provisional listing in January 2025:

Registered Name: Malcolm Reid's Emporium (Façade)

SHP No. 11579

Date listed: 5-June-1986

At the time of listing in 1986, under different legislation, the *Heritage Act 1978* (SA), there was no gazetted assessment criteria. The listing, noted in the South Australian Government Gazette (1986:1495) included the following information:

Name: Façade of Malcolm Reid's Emporium

Address: 187-193 Rundle Street, Adelaide 5000. CT volume

1461 folio 190. Portions of Town Acres 88 and 89.

City of Adelaide.

The 1986 Heritage listing was also subject to a Better Heritage Information Summary (BHI) during the aforementioned appeal, that was endorsed by the SAHC in Sept 2024. This BHI Summary provides additional information to the register entry under s14(6) of the Heritage Places Act, including

- the place's name and address
- SHP number and date it was confirmed in the Register
- a statement of heritage significance, to better understand the significance of the place
- a site plan showing outline of elements of significance of SHP
- a description, history and chronology of the place
- other site details, such as the date of construction, architect, builder, current and previous uses, and photographs.



3.0 Previous Assessments

The assessment report prepared for the South Australian Heritage Committee in 1982 formed the basis of the 1986 State Heritage listing. While the criteria and its analysis pre-dates the current legislation, this assessment does provide an insight to the integrity (and noted heritage values) of the place while it was still tenanted and operated by the Malcolm Reid Emporium.

Points of interest relevant to this current assessment include:

This report has been prepared as part of the Heritage Conservation Branch's processing of City of Adelaide items reviewed by the Lord Mayor's Heritage Advisory Committee for possible inclusion on the State Register. This item was recommended by the Lord Mayor's Advisory Committee's consultants and subsequently recommended by the Lord Mayor's Heritage Advisory Committee as well.

<u>Historically</u>, the Malcolm Reid Emporium is important because of its association with the company, Malcolm Reid & Co., a leading merchant from the 1880's. Branches were established both Interstate and overseas.

<u>Architecturally</u>, the Malcolm Reid Emporium is strongly related to the adjoining Austral Hotel which is similarly detailed. The complete row is typical of a substantial "boom period" commercial terrace with stuccoed Italianate detailing.

<u>Environmentally</u>, the Malcolm Reid Emporium is significant as a major element on the Rundle Street East streetscape. It is also architecturally one of the best and largest facades.

The <u>Integrity</u> of the Malcolm Reid Emporium is high, although the lower shop front and verandahs have been modernised.

The 1987 data summary for the interim State Heritage¹ listing went on to note "interior is of little interest, although flooring supported by cast iron columns".

The heritage listing for the building in 1986 went on to be limited to its "façade" only.

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¹ Department for Environment and Water 2025, Research Pack for SHP 11579.

4.0 2025 State Heritage Provisional Entry

The minutes of the SAHC meeting dated 14 August 2025 note:

...on 15 January 2025, Chair of the South Australian Heritage Council, provisionally entered Malcolm Reid's Emporium, 187-195 Rundle Street, Adelaide in the South Australian Heritage Register under s17(2)(b) of the Heritage Places Act 1993, to protect the place while it is assessed as it is likely to meet s16 criteria (a) and (b) of the Act.

presented an Assessment Report for the Former Malcolm Reid's Emporium for the Council's consideration and recommended that the place meets s16 criteria (a), (b) and (g) and that "Former" is added to its Register name in accordance with the Council's Naming Policy.

The Council discussed the report and determined this place did not meet criteria b), c), d), e) or f). [Note 1]

The Council unanimously agreed it met criterion a) and b).

The Council agreed by majority that it met criterion g).

The Council requested Heritage SA strengthen the text for criterion g) when it prepares the draft Summary of State Heritage Place document to accurately reflect the importance the Malcolm Reid Emporium held across South Australia.

...The owner has been given the opportunity to make both a written representation and to appear and speak to this matter at the 30 October 2025 meeting of Council.

RESOLUTIONS

The South Australian Heritage Council:

- Noted the Assessment Report prepared for Former Malcolm Reid's Emporium, 187-195 Rundle Street, Adelaide Sa 5000 (CT 6167/606 D37943 A53, CT 6167/607 D37943 A54, Hundred of Adelaide).
- **Determined** criteria (a), (b) and (g) of the Heritage Places Act 1993 are met.
- Halted further consideration of the matter to afford the owner the
 opportunity to make further representation, with any representation
 by the owner to be submitted to Heritage South Australia within six
 weeks of providing them the assessment report.
- Noted that this matter does not change the existing listing of Malcolm Reid's Emporium (Façade) (SHP 11579), which remains a State Heritage Place.

[Note 1: while the minutes note that Council both recommended and rejected criterion (b) it is understood the former to be accurate]



The August 2025 Heritage Assessment Report for the Site provided the following Statement of Heritage Significance for the Place:

Built between 1882 and 1883 for the South Australian Company, Former Malcolm Reid's Emporium, demonstrates the dominance of the city department stores that defined South Australian's shopping experience from the late nineteenth to mid-twentieth centuries. Established by merchant Malcolm Donald Reid, Malcolm Reid & Company's Furniture Emporium occupied the building for approximately 80 years. Typical of department stores of the period, it was also one of the first stores in the state to introduce the concept of a gallery of fully furnished and priced model showrooms which could be inspected without the help of a sales assistant and without pressure to purchase. It remains as an uncommon example of this style of shopping and shopkeeping that is no longer practiced in South Australia. Not only does the place demonstrate the growth of the state's retail trade and the rise of mass consumption during the first half of the twentieth century, but it also represents the success of one of the state's longest running furniture manufacturers and retailers, Malcolm Reid and Company Limited.

DEW's Heritage Assessment Report goes on to provide the following summary of Elements of Significance for the place:

- Malcolm Reid's Emporium (Façade) (SHP 11579)
- Stone and brick buildings, including the single storey warehouse
- Timber flooring
- Timber staircase and balustrade on western side of the building between the ground and second floor
- 1960s lift, lift buttons and red acrylic 'LIFT' signs to each floor
- Pressed metal ceilings to internal spaces
- Timber-framed windows to the first and second floors of the southern elevation along York Street (including louvred panes of glass)
- Painted 'Malcolm Reids' signage above rear entrance along York Street
- Model showroom partitions with numbered lights.

5.0 Summary of Relevant Background History

DEW's 2025 Heritage Assessment provides an overview of the history of the former Malcolm Reid's Emporium, 187-195 Rundle Street, Adelaide which includes (in summary):

Early history of the building:

• The South Australian Company commissioned architect William McMinn to design a row of fourteen shops and dwellings and hotel on



Rundle Street, halfway between Pulteney Street and Frome Road. The building was constructed in stages. The first section, comprising the present Austral Hotel and row of shops, was built between 1879 and 1880. The second, consisting of seven shops and dwelling houses, were drawn to the same design by firm Grainger, Naish and Worsley and completed in early 1883. It was the second stage that later became Malcolm Reid's Emporium.

• In its original configuration, each shop had a cellar of 60 x 19 feet; a ground floor comprising a shop 46 x 15 feet, a dining room and office, a sitting room and three large bedrooms; a closet and bath on the first floor; and an open 'long room' on the second floor which could be subdivided into smaller compartments if required. Two warehouses forming the centre of the whole block also had their own cellars.

History of Malcolm Reid (and Company Limited):

- Malcolm Reid and Company Limited was founded by Port Adelaideborn Malcolm Donald Reid. Reid's business began as a timber yard in St. Vincent Street, Port Adelaide.
- Reid opened a furniture manufacturing warehouse in Franklin Street, and by the mid-1890s, his company employed over 100 workers.
- Reid opened another furniture warehouse on 55 Rundle Street, Adelaide, in 1892. In addition to selling timber mantels, dining tables, and chests, this warehouse also stocked perambulators, mattresses and cooking stoves. Within a year, the business had outgrown the premises, moving to 148 Rundle Street. It was at this location that Reid began selling imported furniture from England.
- In 1902, he moved to Johannesburg, South Africa, where he opened a timber business under the name of Malcolm Reid and Son before travelling to London where he established another branch of the firm.
- Upon his return from overseas in 1909, Malcolm Reid moved his furniture emporium from 148 Rundle Street to new premises next to Messrs. Foy and Gibson in Rundle Street, with a warehouse on the corner of Bent and York Streets (behind the Austral Hotel) where furniture was made. These new premises were the western end (no 187) of the Site.
- Malcolm Reid & Company Limited purchased the 187-195 Rundle Street from the South Australian Company in 1927, and contributed to trade from the site until the early 1990s.



Alterations to the building during Malcolm Reid tenure include:

- In the early 1930s, the walls in between the ground floors of the two buildings were demolished and the resulting openings supported by steel girders, increased the floor space. The shopfront was also updated to create a spacious island windows. In March 1934, a neon sign was installed onto the building's façade.
- Further alterations were made to the shopfront in 1953 by Woods, Bagot, Laybourne-Smith and Irwin. These alterations resulted in the reconstruction of the western display windows and improvement of the ramped entrance. The following year several longitudinal walls on the first and basement levels were removed and steel columns and joists inserted to support the structure. The basement floor was also removed and lowered to allow additional headroom.
- In 1963, a new lift and stairwell was installed to the rear of the building and the following year a single-storey permanent store was constructed at the rear of the shop. Further alterations were made to the rear of the building in 1972, when an overhead walkway was installed connecting the department store to a new, multi-storey warehouse and factory on York Street.
- In the late 1980s, the island display windows to the Adelaide store were demolished, bringing the ground level shop floor forwards towards Rundle Street.
- Malcolm Reid's Furniture Emporium continued to operate until approximately 1990, whereafter it closed.

Recent History of the Building:

 Following the Emporiums closure, the building was converted into office and retail spaces.

6.0 Review of Historic Photos

Historic photographs of the Rundle Street façades indicate:

Upper facades:

- The upper portions of the Rundle Street façade have retained generally high integrity, noting the central upper pediment (Figure 1) is no longer present.
- Painted sign-writing on the façade was used to promote tenancies during the early years prior to Malcolm Reid's tenure, which was common or the era (Figure 3). This signage was adapted to promote Malcolm Reid by c1929 (Figure 4).
- Figure 5 and Figure 7 indicate that these upper façades were painted both white and blue at some stage during Malcolm Reid's tenure.



Shopfronts:

- Early shopfronts reflected the tenancy divisions through the building, featuring traditional display windows with recessed entrances (Figure 3).
- Figure 7, likely c1980s, shows expansive glazed shopfronts with clear views to the open tenancy within. These 'island' shopfronts allowed pedestrians to walk around the shop displays and were likely present when Malcolm Reid closed for trading in early 1990s.

Verandah:

- The original verandah was concave in design, pitching down to an eaves gutter and supported off pairs of likely cast iron posts (Figure 2).
- By c1909 the verandah to the northern end had been rebuilt, increasing its height and design of the adjacent Foy Gibson's.
- Figures 6 and 7 illustrate the verandah closer towards the end of Malcolm Reid's tenure, column free with curved ends and a modest fluted fascia that included signage.

Interiors:

 Limited internal images of the Malcolm Reid Emporium were able to be sourced. Figure 8, from the 2025 DEW Assessment report shows the open retail floor created through the removal of internal walls, with an open void connecting ground and first floors. Steel columns with pressed metal ceilings are evident, with rear windows appearing to the York Street frontage. This image also identified a staircase to the right of frame, that will be discussed later in this assessment.



Figure 1 – 187-195 Rundle Street, c1908. [Source: SLSA, B_8129]

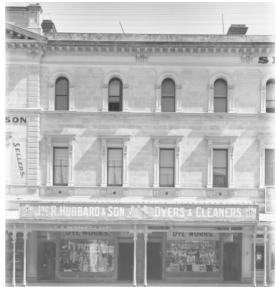


Figure 2 – 187 Rundle Street, c1901. [Source: SLSA, PRG 631/2/268]





Figure 3 – 187-195 Rundle Street, c1909. [Source: SLSA, PRG 631-2-448]



Figure 4 – 187-195 Rundle Street, c1929. [Source: SLSA, B_5819]





Figure 5 – 187-195 Rundle Street, date unknown. [Source: Experience Adelaide]



Figure 6 – 187-195 Rundle Street, c1980s. [Source: Experience Adelaide]



Figure 7 – 187-195 Rundle Street, c1980s. [Source: Experience Adelaide]



Figure 8 - Malcolm Reid Emporium interiors, c1930s. [Source: 2025 DEW Assessment Report]

7.0 Site Observations

' undertook a site inspection of the premises on 3 Sept 2025 where the following was observed:

Rundle Street façade:

The upper façade of 187-195 Rundle Street remains readily legible as part of the overall 'shop / dwellings terraces' that extend east to the Austral Hotel. This façade, along with the that of the State Heritage listed shops at 197-203 Rundle Street and the Austral Hotel are a prominent historic feature within the local streetscape (Figure 9). This attribute of the place is addressed by the 1986 State Heritage listing.

Shopfronts:

The expansive shopfront of the Malcolm Reid Emporium (Figures 6 and 7) has all been removed and replaced a series of individual frontages that reflect current tenancy configurations (Figure 10, 12, 13).

Verandah:

 The current verandah structure is almost entirely concealed behind contemporary lining to its underside and fascia signage (Figure 14).
 Its height and general setout match that evident in Figures 6 and 7 however the extent of remnant finishes remains unclear. There is no discernible evidence of the former Malcolm Reid use present.

Interiors:

- The open floor plates created by Malcolm Reid to accommodate their Emporium have been subdivided up into smaller tenancies, as evident in the floor plans provided below (Figure 11).
- There is very little visible evidence of the Emporiums' 'department store' characteristics remaining, and what does remain could be best described as 'remnants'.
- Remnant fabric includes those items summarised in the DEW Report, namely:
 - Visible remnants at ground floor level are some steel columns in one tenancy (Figure 13) and the staircase (Figures 15, 16) as identified in Figure 8
 - First floor level remnants are limited to isolated steel columns, and possibly some floor boards (although the provenance of the floor remains unclear) (Figure 17)
 - Lift shaft and "Lift" signage (Figure 20)
 - Sections of pressed metal ceilings, some steel columns and decorative features within bulkheads to Second Floor (Figure 19, 22).
- Importantly, these remnant elements are isolated fragments only and have lost all context of being associated a 'city department store' or having any direct association with the Malcolm Reid Emporium itself.



Figure 9 - 187-195 Rundle Street, c1908. [Source: SLSA, B8129]



Figure 10 – 187 Rundle Street, c1901. [Source: SLSA, PRG 631/2/268]

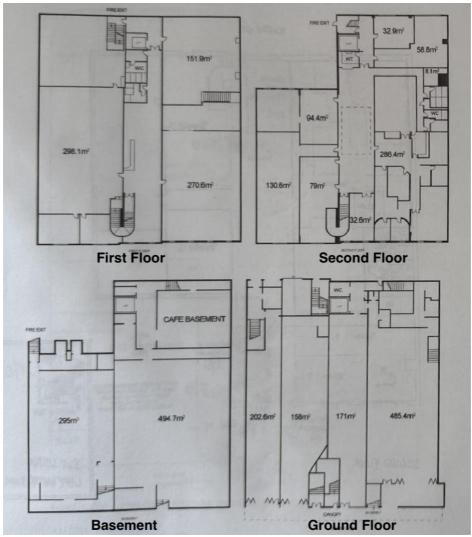


Figure 11 – Current floor plans, 187-195 Rundle Street Adelaide



Figure 12 – Typical small ground floor tenancy



Figure 13 – Ground floor tenancy with remnant steel columns



Figure 14 - Current awning / verandah, 187-195 Rundle Street Adelaide



Figure 15 – Remnant staircase within ground floor tenancy



Figure 16 – Remnant staircase within ground floor tenancy



Figure 17 – First floor tenancies. Provenance of floor unknown, as it includes the infill of the original void. Glazed tenancy walls also clearly contemporary



Figure 18 – Second floor tenancies. Provenance of floor unknown. Glazed tenancy walls also clearly contemporary, as is skylight

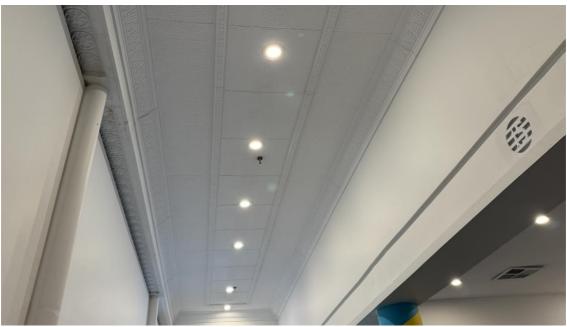


Figure 19 – Remnant second floor pressed metal ceilings and bulkhead detail



Figure 20 – Remnant lift sign



Figure 22 - Remnant columns to rear of second floor



Figure 21 – York Street windows.

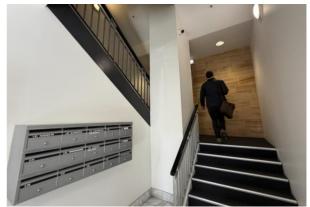


Figure 23 – Current first and second floor entrance.

8.0 Significance Assessment

The 2025 DEW Heritage Assessment report, as considered by the SAHC at its meeting on 14 August 2025, determined that the former Malcolm Reid's Emporium located at 187-195 Rundle Street satisfied s16 criteria (a), (b) and (g) of the Heritage Places Act. "review of this assessment is provided below. This review has been structured in accordance with DEWs 2024 Guidelines for Interpreting State Heritage Criteria – Assessing Places for State Heritage listing (the Guidelines), which were endorsed by the SAHC.

8.1 Historic Themes

The DEW Heritage Assessment report cites the following historic themes as being relevant to the assessment of heritage values of the place. *Italics* text is sourced from the Historic Themes for South Australia (South Australian Heritage Council 2022):

5. Developing South Australia's economies

Building the South Australian economy through primary, secondary and tertiary (service) industries, and the institutions that support economic development such as banking and finance.

5.1 Developing South Australia's economy

Types of places represented under this theme include: Shops, banks, office buildings, financial institutions, insurance companies.

6. Developing Social and Cultural Life (Supporting and building communities)

Highlights the role of churches, schools, hospitals, philanthropic and community organisations and institutions in transferring oldworld belief systems to a new colony. It also covers the rich legacy of creative culture and the arts as a part of South Australia's history and identity including arts, sports, popular culture and science.

6.5 Participating in sport, leisure and recreation (including eating, drinking and holidays)

Types of places represented under this theme include: Ovals, grandstands, sporting clubs and buildings, theatres, cinemas, galleries, public art, clubs, showgrounds, fairgrounds, restaurants, hotels, beach infrastructure.

Historic theme 5 and 5.1 appear relevant to this assessment. While we are not sure if the former Malcolm Reid's Emporium could be reasonably described as a "department store", we acknowledge it was a 'large retail store' and that such places were important to the economic development of the City and State.

Historic theme 6 and 6.5 do not appear relevant. DEW's Heritage Assessment report classified the place as a "City Department Store" and goes on to say department stores were places of entertainment and leisure as they included such offerings as galleries, musical performances and fashion parades. Although these uses existed, they were peripheral to the main purpose of the store, and used to attract shoppers and enhance the shopping experience, rather than service as a specific venue for leisure and entertainment. 'Department stores' are not comparable venues for leisure and recreation to other examples cited under this theme, namely theatres, cinemas, galleries, showgrounds and fairgrounds.

8.2 Criterion (a)

(a) it demonstrates important aspects of the evolution or pattern of the State's history

The 2025 DEW Heritage Assessment report notes under this criterion:

Former Malcolm Reid's Emporium, including the Façade of Malcom Reid's Emporium (SHP 11579), is associated with the historical themes Developing South Australia's economies and its subtheme, Developing South Australia's economy; and the theme Developing Social and Cultural Life (Supporting and building communities) and its subtheme, Participating in sport, leisure and recreation (including eating, drinking and holidays).

Originally a row of shops and attached dwellings constructed in the early 1880s for the South Australian Company, the building was occupied by Former Malcolm Reid's Emporium from approximately 1909 to c.1990. The Emporium was established for the sale of furniture and household goods, and included departments such as drapery, ironmongery, plated wares and saddlery. Typical of department stores of the period, Malcolm Reid's store featured a diverse range of stock, fixed and ticketed pricing, live musical performances, circumnavigable arcade window displays, quality guarantees and returns, and home delivery. It was also one of the first stores in the state to introduce a gallery of fully furnished and priced model showrooms. These could be inspected without the help of a sales assistant and without pressure to purchase.

Department stores like Malcolm Reid's transformed the way that South Australians shopped during the first half of the twentieth century, offering their patrons not only a place to shop, but a place to socialise. Department stores defined the retail landscape from the mid-1870s to mid-1960s and contributed to the emergence of mass consumption in the state. When compared to other early city department stores such as Charles Moore's in Victoria Square (SHP 13412) and Hooper's Furnishing Arcade on Hindley Street (SHP 11739), Malcolm Reid's retains a larger number of internal features such as pressed metal ceilings, timber finishes, exterior signage, and model showroom partitions with numbered lights, allowing the heritage values of the place to be clearly understood and appreciated. As a result, the place represents the evolution of South Australia's mercantile industry, in particular the dominance of the city department store, during the

twentieth century.

It is recommended that the nominated place fulfils criterion (a).

We generally agree that city-based Department stores demonstrate important aspects of the evolution and pattern of the State's history (criterion (a)) through their association the development of South Australia's economies (historic theme 5, 5.1). We <u>do not</u> agree, however, that the former Malcolm Reid Emporium is representative of this theme or attribute.

The former Malcolm Reid building was not built as a 'department store', or large retail store, but rather as a series of smaller 'terrace' shops and dwelling houses in 1880. This use is reflected in the external appearance and styling of the building facades, which utilises domestic styled and scale windows spaced closely together in a vertical rhythm reflecting the original tenancy arrangements accommodated within the building.



Figure 24 –Rhythm and spacing of fenestration reflects original 'terrace' shop and dwelling use, rather than large floor plate retail.

Malcolm Reid modified the building interiors in the early 1930s to accommodate its 'large floor plate' retail by:

- Removing internal walls to create large floor plates within the building, necessitating the installation of steel columns and beams.
- Creating new expansive 'island shopfronts' across the street frontage that afforded views through to the retail floor
- Providing a visual connection between the ground and first floors, connected by a staircase towards the rear of the tenancy
- Pressed metal ceilings throughout.

These large floorplates, intrinsic to 'department stores' are no longer legible, with the building reverting back to smaller tenancies separated by internal walls after 1990. This is particularly evident at the ground floor level, where the expansive department store shopfront has similarly been removed and replaced with a series of narrower contemporary shopfronts that reflect the current smaller tenancy layouts.

The void between the ground and first floor (visible in Figure 8) has also been infilled. While some remnant features of the former Malcom Reid tenancy remain, they are generally scattered within the building and have no spatial or contextual relationship to the Department Store use of the site.

The DEW Heritage Assessment report schedules a series of 'key physical characteristics of city department stores' (2025:4). Many of these characteristics are not unique to department stores, while many others are not present in the existing building, clearly demonstrating its lack of association with this building type, and in turn the historic theme, as discussed below:

Table 1: Key Physical Characteristics of City Department Stores

Key Physical Characteristic	Comment	Applicable?
Prominent location along main shopping streets	This characteristic is not unique to Department Stores, but rather is shared by most city retail uses, as demonstrated by the fact that 187-195 Rundle Street was neither originally built or operated as a department store, but rather as a series of narrow 'terrace' shops and dwellings.	No
Exteriors designed to attract customers with impressive street facades	This characteristic is not unique to Department Stores. The street façade is also not representative of a department store, having been designed as a series of narrow 'terrace' shops and dwellings. While the Malcolm Reid adaptation did feature expansive and 'impressive' shopfronts, these have all be removed and replaced by narrow contemporary frontages reflecting the current tenancy configuration.	No
Multi-storey buildings	This characteristic is not unique to Department Stores, with the building design reflecting its original 'terrace' shop and dwelling layout.	No
Plate glass windows to ground floor frontage to enable an extensive display of goods, including arcade window	These shopfronts are no longer present, having been replaced with narrow contemporary frontages reflecting the current tenancy configuration.	No
Prominent, eye-catching signage, including neon signs from the late-1920s onwards	The neon sign to the street façade remains and is representative of 'city department stores', however does not form part of this assessment on advice from the Crown dated March 2025.	N/A

Opulent interiors	The vast majority of the Malcolm Reid interiors have since been removed from the building, with only scattered remnant elements remaining. The current building interiors cannot be described as 'opulent' or representative of its previous 'department store' use.	No
Cafeterias and other public amenities to supplement the shopping experience	None of these features remain.	No
Large, open interior spaces fitted out with smaller departments	The original large open interior spaces are no longer present, having been subdivided up into smaller tenancies.	No
Innovative technological features such as vacuum tubes, flying fox change dispensers, escalators, lifts, dumb waiters and public announcement systems	The 'lift' sign (c1963) is the only remnant of such 'technology' and it does not date from an era where such features were innovative.	No
Provision of good lighting and ventilation, initially through light wells and air shafts and later through artificial lighting, heating and cooling	None of the original lighting and ventilation systems remain.	No
Warehousing, stock storage, mail order and associated departments, often located at the rear of the building with direct access to a laneway	Some of the rear 'stock storage' areas remain to the rear of the site (fronting York Street), and are identified by a 'Malcolm Reid' painted sign. There is nothing particularly noteworthy of these spaces or structures.	To a minor and indirect extent only

With the exception of the neon sign to the Rundle Street frontage, which on instruction from the Crown is excluded from this assessment, the only 'key physical characteristics' of city department stores present at 187-195 Rundle Street is the red brick 'stock storage' areas to the rear of the building. These features alone are insufficient to render the entire site representative of a city department store, particularly given they are appended to the rear of a building that was designed and built as a series of smaller 'terrace' shops and dwellings.

187-195 Rundle Street is not representative of a city department store, nor the historic theme such a building type represents, be that theme 5 and 5.1 (Developing South Australia's economies) or the contested themes of 6 and 6.5 (Developing Social and Cultural Life). The building was designed and constructed as a series of 'terrace' shops and dwellings and was later adapted to a 'city department store' in the 1930s. Very little evidence of this adaptation remains today.

For these reasons the Former Malcolm Reid's Emporium is **not considered** to fulfil criterion (a)

8.3 Criterion (b)

(b) it has rare, uncommon or endangered qualities that are of cultural significance.

The 2025 DEW Heritage Assessment report notes under this criterion:

Former Malcolm Reid's Emporium is an uncommon example of the city department stores that defined the retail experience for South Australians from the late nineteenth century until the 1960s.

Rapid social and economic progress beginning in the late nineteenth century witnessed the retail landscape of Adelaide evolve from small, family-run specialty stores into large-scale, shopping destinations. Department stores transformed the way South Australians shopped. Complete with a diverse-range and quick-turnover of mass-produced goods, fixed and ticketed pricing, extended payments, quality guarantees and returns, city department stores also offered entertainment such as musical concerts, picture galleries and fashion parades. New merchandising standards and sales methods utilised by the department store contributed to the emergence of mass consumption, and by the 1920s, department stores in South Australia had carved out a unique market, offering their patrons not only a place to shop, but a place to socialise.

The emergence and rise of suburban shopping centres and strip malls from the early 1960s lead to the decline of the city department stores in Adelaide that were unable to compete with the new shopping experiences being offered. Most closed over the following decades with the larger national brands becoming 'anchor tenancies' in city-based shopping centres as evidenced by the opening of the Myer Centre in 1991 and the Adelaide Central Plaza in 1998 which included a new David Jones department store.

Former Malcolm Reid's Emporium is an uncommon example of the city department stores that once thrived in South Australia between the mid-1870s to mid-1960s. Many notable stores have since been demolished or substantially altered. Only five department store buildings, including Former Malcolm Reid's Emporium survive to demonstrate the way South Australians shopped during the first half of the twentieth century. As such, Former Malcolm Reid's Emporium, including the façade, represents a way of shopping and shopkeeping that is no longer practiced in the state. Signage to the exterior of the building, its prominent position between Rundle Street and York Street, and surviving internal features such as the timber staircase, pressed metal ceilings, and model showroom numbers provide evidence of the exuberance of the period and the consumer culture that sustained it.

It is recommended that the nominated place **fulfils** criterion (b).

The DEW Heritage Assessment report also notes with regards to city department stores:

A majority of the city department stores that thrived in Adelaide between the mid-1870s to mid-1960s have been demolished. Those that remain have been repurposed and substantially modified internally. None remain as department stores.

It is unclear why the assessment limits its analysis to the era of 1870s to 1960s. While acknowledging department stores in the city went into decline after the 1960s with the emergence and rise of suburban shopping centres, several department stores nonetheless remain operating out of the city, including:

- David Jones, 100 Rundle Mall, Adelaide
- Myer, 22 Rundle Mall, Adelaide
- Kmart, 127 Rundle Mall, Adelaide
- Target, cnr Rundle and Pulteney Streets, Adelaide.

The decentralisation of large retail outlets to the suburbs is likely a primary reason why these stores, and in particular Myer and David Jones needed to modernise their facilities. They remain, however, directly related to this historic theme and building type.

The DEW Heritage Assessment report also notes that there are approx. 113 retail shops and/or stores listed as State Heritage Places and 644 listed as Local Heritage Places. Clearly "shops" (as identified in historic theme 5.1) are neither rare nor underrepresented on the South Australian Heritage Register.

The DEW Assessment narrows this historic theme to:

5. Developing South Australia's economies

Building the South Australian economy through primary, secondary and tertiary (service) industries, and the institutions that support economic development such as banking and finance.

5.1 Developing South Australia's economy

Types of places represented under this theme include: Shops, banks, office buildings, financial institutions, insurance companies.

Shops

City based retail

City based department stores

City Department stores between 1870-1960

The assessment report goes on to provide the following other examples of State Heritage Places that align with this narrowed sub-theme:

City based retail:

 Waterhouse Chambers, 42-46 King William Street, Adelaide (SHP 13371). Built between 1847 and 1850



- The Gallerie Shopping Centre (former G. and R. Wills Warehouse), 201-202 North Terrace, Adelaide (SHP 13365, SHP 13367). Constructed between 1865 and 1880
- Adelaide and Gays Arcade, 111-117 Rundle Mall, Adelaide (SHP 10795). Opened in 1885
- Beehive Corner Building, 31-40 King William Street, Adelaide (SHP 11702). Opened 1897.

City Department stores between 1870-1960:

- **Sir Samuel Way Building**, 241-259 Victoria Square, Adelaide (SHP 13412). Built between 1913 and 1916 as the Charles Moore Department Store
- John's Period Furniture (former Hooper's Furnishing Arcade), 41-47
 Hindley Street (SHP 11739). Built in two stages between 1929 and 1931
- Former Miller Anderson Building, 12-22 Hindley Street, Adelaide (LHP). Constructed c.1911
- Former Coles Department Store, 112-118 Rundle Mall, Adelaide (LHP) (subject of a future assessment). Built 1939.

It remains questionable as to whether DEW's Assessment has excessively narrowed the historic theme (*City Department stores between 1870-1960*), or if indeed such places representative of this sub-theme are in fact "rare". Irrespective, however, the analysis undertaken by under criterion (a) clearly demonstrates that 187-195 Rundle Street is <u>not</u> representative of a City based department store.

As noted, the façade of 187-195 Rundle Street is representative of a series of smaller 'terrace' shops and dwellings. While the site was adapted into a 'department store' in the 1930s, very little of these attributes remain today. Of those features that do remain:

- The neon sign to the Rundle Street frontage does not form part of this assessment
- The rear 'stock storage' facilities which have a minor and indirect association only, having no spatial or contextual relationship to a department store complex, being appended to the rear of a building that was designed and built as a series of smaller 'terrace' shops and dwellings
- Scattered remnant elements (some columns, a stair, some ceilings, a lift sign) of the former fitout.

DEWs assertion that "surviving internal features such as the timber staircase, pressed metal ceilings, and model showroom numbers provide evidence of the exuberance of the period and the consumer culture that sustained it" is highly misleading. Remnant elements of this former use are scattered within the building, with many having no spatial context to each other (due to later tenancy subdivisions) significantly limiting any interpretation of them as being representative of *City Department stores between 1870-1960*.

187-195 Rundle Street is not representative of a city department store and therefore not a rare example of these types of facilities operating between 1870 and 1960s in the City.

For these reasons the Former Malcolm Reid's Emporium is **not considered to fulfil criterion (b).**

8.4 Criterion (g)

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

The 2025 DEW Heritage Assessment report notes under this criterion:

Former Malcolm Reid's Emporium is associated with the South Australian Company, Malcolm Reid (and Malcolm Reid and Company Limited), architect William McMinn, and firm Grainger, Naish and Worsley Civil Engineering, Architects and Surveyors. Each is considered in turn.

The South Australian Company commissioned architect William McMinn to design a row of fourteen shops and dwellings and a hotel on Rundle Street in the late 1870s (subject of this assessment). Established by George Fife Angas in 1835, the company became the 'economic backbone of the province' encouraging preliminary purchase of land in the colony, providing infrastructure such as roads, bridges, ports and mills, and establishing a flourishing livestock industry. While the significance of the South Australian Company to South Australia's history is indisputable, the wide breadth of their numerous contributions to the establishment of the early colony are better represented by places such as their bespoke headquarters, Gawler Chambers (SHP 13104), and the location of the first settlement, Reeves Point Settlement Site (SHP 10980).

William McMinn was commissioned by the South Australian Company to design the hotel, shops and dwellings on Rundle Street, with the final design being completed by architectural firm Grainger, Naish and Worsley. While McMinn's architectural career was relatively brief, only practicing between 1869 and 1884, he carried out many prominent works around South Australia, including the Mitchell Building, The University of Adelaide (SHP 10879) and the Governor's Former Summer Residence, Marble Hill (SHP 10884). Even shorter was the partnership formed between architects John Grainger and Francis Naish, and licensed surveyor Henry Edward Worsley, who practiced together between 1881 and 1883. As the extent of the influence of each of the architects or firms on the final design of Former Malcolm Reid's Emporium is considered tenuous, their association cannot be defined as either close or enduring. Each practitioner is better represented by their respective projects and designs which include the Albert Bridge over the River Torrens (Grainger and Worsley, SHP 10765) and Elephant House, Adelaide Zoo (Naish, SHP 13650).

The building was home to Malcolm Reid's Furniture Emporium from

1909 until approximately 1990. Beginning as a timber business in Port Adelaide, Malcolm Reid's furniture store on Rundle Street next to Messrs. Foy and Gibson introduced a new style of shopkeeping to South Australia with its gallery of fully furnished model rooms. Selling predominantly Australian-made furniture, Malcolm Reid's emporium on Rundle Street was one of South Australia's longest-operating city department stores, maintaining a reputation for producing high-quality, locally produced goods at attractive prices for approximately 80 years.

Former Malcolm Reid's Emporium is considered to demonstrate a special association with Malcolm Reid and Company Limited. The fabric of the building was heavily influenced by the company over the course of the twentieth century and several original features survive. These include remnants of the pressed metal ceiling, timber staircase, lift, model showroom numbers, and painted 'Malcolm Reids' signage at the building's rear marking the back entrance to the store. These features together with the adjoining associated Malcolm Reid's Emporium (Façade) (SHP 11579) enables a special association with Malcolm Reid, and the Malcolm Reid and Company Limited, to be discerned, understood and appreciated.

It is recommended that the nominated place fulfils criterion (g).

DEWs assessment concludes that the site's associations with South Australian Company, architect William McMinn, and firm Grainger, Naish and Worsley Civil Engineering, Architects and Surveyors is insufficient to satisfy this criterion. We agree.

DEWs assessment goes on to consider the site to "demonstrate a special association with Malcolm Reid and Company Limited".

DEWs assessment Guidelines provide the following threshold test for this criterion:

Question G1: Who/what is the person, organisation or event associated with the place?

Threshold test G1: To what extent has the person, organisation or event made a strong, notable or influential contribution to the course of South Australia's history? [Consider whether the significance is at the state level]

This is a very high threshold and merely being 'well known' or an operating business for an extended period of time does not satisfy this test. Rather, the person or organisation needs to have made a "notable or influential contribution to the course of South Australia's history".

For comparative purposes, organisations and businesses that may reasonably be said to meet this threshold would likely include:

- Elder Smith & Co. (later Elders Limited) Founded in the 19th century, Elders became a giant in wool broking, pastoral services, and rural finance, shaping the development of South Australia's agricultural sector and national pastoral expansion.
- Holden Established in Adelaide in 1856 as a saddlery, Holden



- evolved into Australia's first car manufacturer (building its first all-Australian car in 1948). For decades, Holden was a major employer and symbol of national industry until closure in 2017.
- Hills Hoist (Hills Industries) Inventor Lance Hill's rotary clothesline became an Australian cultural icon, produced in Adelaide from 1945 and exported widely.
- Adelaide Steamship Company Founded in 1875, it became one of the most powerful shipping and later diversified conglomerates in Australia, central to South Australia's maritime trade.
- **Balfours** Established in 1853, Balfours became one of the state's most famous bakeries, creating the iconic Balfours frog cake (now heritage listed as a South Australian icon).
- Penfolds Wines Founded in 1844, it became one of the world's most famous wine producers, with its Grange label recognised globally and central to South Australia's reputation as a wine state.
- Coopers Brewery Established in 1862, Coopers remains familyowned and is the largest Australian-owned brewery, playing a central role in both the economy and cultural life.
- The Advertiser (newspaper) Since 1858, it has been the state's most influential daily paper, shaping public opinion and political debate.
- Bank of Adelaide (founded 1865) Provided the financial infrastructure that supported the growth of commerce and industry until merging with ANZ in 1979.
- Gerard Industries (Founded 1920s, Adelaide): It played a significant role in South Australia's manufacturing identity and was a major employer for decades, especially in Bowden and later Park Holme.

In a retail context, organisations may include:

- John Martin's (est. 1866) Adelaide's legendary department store, fondly remembered for "Magic Cave" and the Christmas Pageant, which became major cultural traditions.
- Harris Scarfe (founded 1849) One of the oldest retailers in Australia, providing household goods and textiles; played a major role in shaping Adelaide's retail character.

While DEWs Heritage Assessment report provides a detailed history of Malcolm Reid and Company Limited, it fails to demonstrate how it made a notable or influential contribution to the course of South Australia's history, particularly when compared to those organisations summarised above.

The extent to which Malcolm Reid and Company Limited satisfies the assessment Threshold test G1 is "weak".

Threshold test G2 of the Guidelines goes on to note:

Question G2: To what extent is the place considered to have special and direct associations with the life or work of the person/organisation or event? [Refer to reference tool G1]

Threshold test G2: How well does the place represent those associations when compared to other places with similar associations [comparative analysis, including evidence in the fabric or documentary resources]

The assessment report goes on to identify the following places with associations with Malcolm Donald Reid, the company he formed and its subsidiaries (noting one is interstate):

- Malcolm Reid's Emporium (Façade) (SHP 11579)
- St Corantyn Clinic (SHP 13460). Malcolm Reid occupied the house from 1912 to 1928. Confirmed as a State Heritage Place on 3 November 1988 for its association with Reid
- Administration building, Malcolm Reid and Co. timber yard, Port River Expressway (now Chevron Traffic Management) (unlisted)
- Former Malcolm Reid furniture store (now Quest on Bourke, 1936), 151-163 Bourke Street, Melbourne.

The only elements of 187-195 Rundle Street that have any association with Malcolm Reid and Company Limited are:

- The neon sign to Rundle Street (which does not form part of this assessment)
- The rear 'stock storage' structures (and painted Malcolm Reid sign) to the rear of the site (which are of minor and indirect association only)
- Remnant elements of the former adaptation of the building (which lack any context to their former association).

The extent to which Malcolm Reid and Company Limited satisfies the assessment Threshold test G2 is similarly "weak".

While Malcolm Reid and Company Limited was a well-known a South Australian business that operated for over 100 years, there is no evidence to support that it made a specific *notable or influential contribution to the course of South Australia's history*, particularly when compared to other similar organisations. The primary feature of the building connecting the organisation to the site is the Rundle Street sign, which does not form part of this assessment. Other features consist of remaining elements without clear contextual association, or the rear 'stock storage' structures that have only a minor and indirect connection.

For these reasons the Former Malcolm Reid's Emporium is **not considered** to fulfil criterion (g).

8.5 Summary

187-197 Rundle Street was neither designed nor constructed as a city based department store, but rather a row of 'terrace' shops and dwellings that were adapted in the early 1930s to accommodate the Malcolm Reid Emporium. While internal walls were removed and the interiors of the building refurbished to accommodate the Emporium, the Rundle Street façade remained its original form and legibility as 'terrace' shops. The exception to this was the Emporium's expansive shopfront (which is no longer extant) and the large neon sign (which does not form part of this assessment).

Internally, little remains of the Emporium's fitout. Openings in floors connecting levels have been infilled, shopfronts replaced, and the large floor plates subdivided up into smaller tenancies, more consistent with the buildings original design.

While a scattering of remnant elements remain of the Emporium's fitout (steel columns, sections of timber floor, some pressed metal ceilings and "lift" signage) they retain no spatial context to each other (due to later tenancy subdivisions) inhibiting the legibility of their former use.

For these reasons, 187-195 Rundle Street is not considered representative of either a department store, a city based department store, nor a city department store representing the eras of 1870-1960. For these reasons, the place fails to satisfy the Heritage Places Act s16(1) criterion (a) and (b).

DEWs assessment report has failed to establish that Malcolm Reid and Company Limited is an organisation that has made a notable or influential contribution to the course of South Australia's history, as sought by the assessment Guidelines. Further, the extent to which 187-195 Rundle Street has legibly associations with the company has been significantly weakened by most of the 1930s adaptations having been removed or reverted. For these reasons the place fails to satisfy the Heritage Places Act s16(1) criterion (g).

9.0 Merits of an Additional Listing

187-195 Rundle Street, Adelaide, is already a State Heritage Place, having been listed in 1986 for its associations with the Malcolm Reid Emporium, its architectural merit as an example of 'commercial terraces' associated with the economic "boom period" of the 1880s. This listing is limited to the "façade" of the building, with assessments of the era noting the interiors were of "little interest", despite Malcolm Reid's Emporium ongoing operation from the site.

It is understood that the Heritage Places Act does not afford the SAHC opportunities to alter existing State Heritage listing. Instead, an additional and separate new listing is required if any updates or refinements to a State Heritage listing are needed to better represent a place's heritage significance. This approach is administratively cumbersome and often confusing. The merits of pursuing an additional State Heritage listing for a site must accordingly be weighed against these shortcomings.

DEW's Assessment report identifies the following Elements of Significance that are <u>additional</u> to that encompassed by the 1986 State Heritage listing:

DEW's Elements of Significance (not limited to)	DASH Architects' Comment	
Stone and brick buildings, including the single storey warehouse	Stone structures are not associated with the 'city department store' use while brick structures are of minor and indirect association only.	
Painted 'Malcolm Reids' signage above rear entrance along York Street		
Timber-framed windows to the first and second floors of the southern elevation along York Street (including louvred panes of glass)		
Timber flooring	The provenance of some of this flooring back to the Emporium use is questionable.	
Timber staircase and balustrade on western side of the building between the ground and second floor	This is a remnant feature to the rear of one of the tenancies and lacks spatial context to other remnant features or the former Emporium use.	
1960s lift, lift buttons and red acrylic 'LIFT' signs to each floor	Of limited interest of historic importance, as such features were common place in the 1960s	
Pressed metal ceilings to internal spaces	Isolated features, primarily to the second floor.	
Model showroom partitions with numbered lights	These are remnant bulkhead to the second floor only.	

' review of the 2025 Provisional State Heritage listing has determined that 187-195 Rundle Street is not representative of the noted themes of historic importance (city department store) and that none of the cited s16(1) criteria of the Heritage Places Act have been satisfied to warrant an additional State Heritage listing for the site.

These findings are further reinforced when considering the cited Elements of Significance otherwise not encompassed by the existing listing. These additional elements, including timber flooring, some pressed metal ceilings and stock rooms, fall well short of any threshold for State Heritage listing in their own right.

For these reasons, there appears to be no justification or merit in pursing an additional State Heritage listing for this site.

10.0 References

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Heritage South Australia 2025, 'Heritage Assessment Report, Former Malcolm Reid's Emporium', SHP 26610, prepared for South Australian Heritage Council, Adelaide.

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