

## South Australian Heritage Council

Submission on whether the entry of **Australian Education Union Building (Raggatt House; SAIT Building)** 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 provide your evidence or further information to explain why you believe the place does or does not meet said criteria. 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-Final-2024.pdf](#)

### Criteria

Criteria under the <i>Heritage Places Act 1993</i> , section 16(1)	Provide evidence or other information why you believe criteria applies or does not apply to this place
(a) it demonstrates important aspects of the evolution or pattern of the State's history	The Australian Education Union (South Australian Branch), formerly the South Australian Institute of Teachers (SAIT), is a union—a collective of education workers who organise through democratic structures to advocate for professional and industrial interests. The power and legacy of the AEU(SA) do not reside in a particular building or site, but in the members themselves and their collective actions. Important milestones in the union's history occurred across various locations, not only at Greenhill Road. The assertion that this site alone encapsulates the evolution of the education union movement in South Australia overstates its significance in the broader pattern of union and education history. Moreover, the current site and the colonial-era building adjacent to it represent a period of Aboriginal dispossession. Any future development of this site offers the opportunity to engage meaningfully with Kurna Elders to restore cultural identity and presence to this land, reflecting a more inclusive understanding of the State's evolving history.

(b) it has rare, uncommon or endangered qualities that are of cultural significance	
(c) it may yield information that will contribute to an understanding of the State's history, including its natural history	
(d) it is an outstanding representative of a particular class of places of cultural significance	<p>While 163 Greenhill Road is one example of brutalist architecture in South Australia, it is not an outstanding or unique representative of this class. Numerous more prominent or well-preserved examples of brutalist architecture exist across Adelaide, including civic and institutional buildings in the CBD. Many of these are of greater public visibility and architectural integrity. Furthermore, other sites hold deeper cultural significance for the education community—for example, 31 Flinders Street, and the Regency TAFE campus—all of which have hosted critical activity in public education and training over decades. The case for heritage listing based solely on architectural typology is therefore weak when compared with these broader and more representative examples.</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>The building at 163 Greenhill Road may reflect elements of brutalist design, but it does not reach the threshold of "outstanding" as required by this criterion. Its current state is one of poor maintenance and functional decline, and it lacks the distinguishing design characteristics or construction innovations that would mark it as a leading or exemplary work of its type. Further, there is limited public visibility or accessibility to the building's features that might contribute to its aesthetic appreciation by the broader community.</p>

(f) it has strong cultural or spiritual associations for the community or a group within it	<p>Unions derive their cultural significance not from physical locations but from the actions and collective efforts of members across generations and sites. The AEU(SA)'s cultural identity is linked to its campaigns, its members, and its work in schools and communities throughout South Australia—not any particular headquarters. Moreover, decisions about the future of 163 Greenhill Road have been made collectively by union members over a number of years. These discussions have involved consultation, deliberation, and a clear democratic mandate to pursue a new future for the organisation, principles that reflect the heart of unionism. Imposing a heritage listing now, against the will of members, undermines the cultural and democratic traditions of the union itself. Imposing a heritage listing on the building against the democratic will of members risks creating serious financial and governance burdens. The building is currently in a state that requires significant maintenance and modernisation. A heritage listing would introduce constraints that may render necessary renovations cost-prohibitive. If the union is unable to bring the building to a usable standard under these restrictions, it may be forced to relocate—leaving a listed building vacant and underutilised. Such an outcome would be neither economically responsible nor consistent with sound heritage stewardship.</p>
(g) it has a special association with the life or work of a person or organisation or an event of historical importance	

## Declaration

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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, [REDACTED]

wish to make a written representation regarding the provisional entry of **Australian Education Union Building (Raggatt House; SAIT Building)**. 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** ~~I do not~~ wish to appear personally before the Council to make oral representations.

Signature:  \_\_\_\_\_ Date: 2/06/2025 \_\_\_\_\_

*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 **4 June 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**