# SA Heritage Register

#### Submission form

### South Australian HERITAGE COUNCIL

## 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: <u>Guidelines-for-Interpreting-State-Heritage-Criteria-Final-2024.pdf</u>

#### Criteria

Criteria under the Heritage Places Act	Provide evidence or other information why you believe criteria applies or does not apply to this place	
<i>1993</i> , section 16(1)		
(a) it demonstrates important aspects of the evolution or pattern of the State's history	While the AEU SA Branch (AEUSA) and its predecessors has played an influential role in South Australia's education landscape, its historical impact is not meaningfully tied to this particular building. The work of the union has occurred across many locations – including public rallies, school sites, departmental offices, pubs, and earlier union premises – rather than been specifically connected to 163 Greenhill Road. The AEUSA has historically operated from various sites in both metro and regional areas.	
(b) it has rare, uncommon or endangered qualities that are of cultural significance	The building is not a rare or intact example of Brutalist architecture. Other, less altered examples exist within the state, located in more prominent positions and in better condition. Given the significant internal modifications and deterioration, the building cannot be considered rare or exemplary within its architectural class. Additionally, I am not aware of public or cultural attachment to the building that would elevate its significance.	

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<ul> <li>(c) it may yield information that will contribute to an understanding of the State's history, including its natural history</li> <li>(d) it is an outstanding representative of a particular class of places of cultural cignificance</li> </ul>	There is no evidence to suggest that the building itself yields unique information that enhances our understanding of the State's history. While the work of the AEUSA has contributed to the history of education in South Australia, the relevant records and archives are held digitally or via records separate to the building. The building itself does not, in itself, offer new or valuable historical insights. The building has undergone internal changes that compromise its ability to serve as a representative example of a particular class. Its function as a union office is not unique, nor is it demonstrably superior
significance (e) it demonstrates a high degree of creative, aesthetic or technical accomplishment or is an outstanding representative of particular construction techniques or design characteristics	or more significant than other similar administrative spaces across the state. The building does not retain original design integrity. Internal structures have been modified over time. The exterior and interior are both in a state of visible disrepair. In its current condition, the building does not demonstrate technical or aesthetic merit that warrants heritage protection.
(f) it has strong cultural or spiritual associations for the community or a group within it	This criterion is directly contradicted by the actions of the very group associated with the building. The AEUSA's governing body, comprising elected representatives of its thousands of members, has determined that the building does not meet the needs of the union's members or staff. A decision has been made to redevelop the property into a facility that is modern, accessible, and functional. This demonstrates that the relevance community – union members – does not view the existing structure as having strong cultural or spiritual significance.

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(g) it has a special association with the	While the AEUSA is a significant organisation in South Australia's		
life or work of a person or organisation or	r educational history, the association between the organisation and this		
an event of historical importance	specific building is not of historical importance. The union's work and		
	influence extend far beyond any one physical location. I am not aware		
	of a particular event of state historical significance that is demonstrably		
	linked to the 163 Greenhill Road address.		
	While the AEUSA is a respected and historically important organisation,		
	the 163 Greenhill Road building has neither architectural integrity nor a		
	historical association strong enough to warrant protection. Listing this		
	site would obstruct necessary development and contradict the		
	expressed will of the community most connected to the site.		

#### 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,

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.

do **Add Mat** wish to appear personally before the Council to make oral representations.

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Signature:		Date: 30 5 25	_
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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:

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

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