

Historic Area Statement Update Code Amendment for Endorsement

Strategic Alignment - Our Places

Public

Tuesday, 2 September 2025
City Planning, Development and Business Affairs Committee

Program Contact:
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Approving Officer:
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Shaping

EXECUTIVE SUMMARY

The purpose of this report is to seek endorsement of the Historic Area Statement Update Code Amendment (the Code Amendment) (**Attachment A**) that has been amended following public consultation (**Attachment B**).

Council determined through its 2024-2028 Strategic Plan and its submission to the Planning System Implementation Review (PSIR) in January 2023 that stronger heritage protection is desirable to maintain the unique character of parts of the city and North Adelaide.

Council's submission to the PSIR sought to fast track an update to the Historic Area Statements (HAS) as a 'quick win' in creating stronger protection. This was supported by the Minister for Planning who also committed funding towards the Code Amendment.

With this background in mind, the report recommends an approach to the HAS update that provides the maximum protection available under the *Planning, Development, and Infrastructure Act 2016* (SA).

The Code Amendment seeks to:

- Strengthen heritage protection policies in the State Government's Planning and Design Code (the Code) by outlining important historic character elements of the existing Historic Areas in updated Historic Area Statements.
- Enhance the assessment of future development applications and better protect historic character, which includes a proposal to introduce Representative Buildings to demonstrate the valued attributes of the Historic Area/s.

On 10 September 2024, the Council endorsed the draft Code Amendment for the purpose of public consultation ([Link 1](#)). Public consultation commenced on 28 October 2024 and closed on 9 December 2024. A total of 44 submissions were received from key stakeholders and the community. Sixteen of the proposed 55 Representative Building owners objected to their proposed listing.

A report was presented to the City Planning, Development and Business Affairs Committee (the Committee) on 4 March 2025 seeking endorsement of the Engagement Report and amended Code Amendment ([Link 2](#)). The Committee heard three deputations and deferred the matter pending further advice from the Administration in relation to the deputations.

An independent review of the sixteen proposed Representative Buildings that were objected to was undertaken by Grieve Gillett Architects (GGA) and formed a workshop item on the City Planning, Development and Business Affairs Committee Agenda on 2 September 2025.

This report presents three options for Council's consideration in progressing the Code Amendment:

1. Option 1 – Include Representative Buildings as supported by the independent assessment.
2. Option 2 – List only properties supported by the owners as Representative Buildings.
3. Option 3 – Do not include Representative Buildings within the Historic Area Statements.

The report recommends Option 1 – Include Representative Buildings as supported by the independent assessment. The updated Code Amendment and Engagement Report are provided in **Attachment A** and **Attachment B** respectively.

RECOMMENDATION

The following recommendation will be presented to Council on 9 September 2025 for consideration

THAT THE CITY PLANNING, DEVELOPMENT AND BUSINESS AFFAIRS COMMITTEE RECOMMENDS TO COUNCIL

THAT COUNCIL

1. Endorses the amendment to the Planning and Design Code for the Historic Area Statement Update Code Amendment as contained in Attachment A to Item 7.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 2 September 2025.
 2. Notes the independent assessment of Representative Buildings as contained in Workshop Item 6.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 2 September 2025.
 3. Endorses the Historic Area Statement Update Code Amendment Engagement Report as contained in Attachment B to Item 7.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 2 September 2025, based on Option 1 - Include Representative Buildings as supported by the independent assessment.
 4. Authorises the Chief Executive Officer, or delegate, to make minor typographical, syntactical and technical amendments to the documents as contained in Attachment A and Attachment B to Item 7.1 on the Agenda for the meeting of the City Planning, Development and Business Affairs Committee held on 2 September 2025 for the purpose of seeking approval from the Minister for Planning.
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IMPLICATIONS AND FINANCIALS

City of Adelaide 2024-2028 Strategic Plan	Strategic Alignment – Our Places Encourage bold, interesting and purposeful development that supports the changing needs of our community and city. Review the heritage overlays to ensure our heritage places are known and accommodated during development by 2025.
Policy	This Code Amendment seeks to amend the City of Adelaide's existing 14 Historic Area Statements in the Planning and Design Code and introduce Representative Buildings. The Code Amendment progresses Council's submission to the Expert Panel on the State Planning Implementation Review endorsed in January 2023, to seek the urgent update of the City of Adelaide's Historic Area Statements to provide greater context, description and guidance.
Consultation	Public consultation on the draft Code Amendment was undertaken in accordance with the Engagement Report (Attachment B), the City of Adelaide's Community Consultation Policy and the State Government's Community Engagement Charter.
Resource	Not as a result of this report
Risk / Legal / Legislative	Not as a result of this report
Opportunities	The Code Amendment seeks to improve the content of the Planning and Design Code to assist development assessment and conservation of historic character in the City of Adelaide. The Code Amendment proposes amendments to the existing Historic Area Statements to improve the clarity, accuracy and comprehensiveness of descriptions of historic character. The Administration proposes to include Representative Buildings in the eligibility criteria for funding under the Heritage Incentive Scheme (HIS) program as an initiative to support the long-term conservation of Representative Buildings in Historic Areas.
25/26 Budget Allocation	The 2025/26 Annual Business Plan and Budget includes a strategic project allocation of \$100,000 to deliver the Planning and Design Code Amendment Program – Year 3. The Historic Area Statements Update Code Amendment commenced in Year 1 with funding support from the State Government.
Proposed 26/27 Budget Allocation	Not as a result of this report
Life of Project, Service, Initiative or (Expectancy of) Asset	Changes to the Planning and Design Code are made through the State Government's Code Amendment process. The City of Adelaide is one of the first councils to be well advanced with a review of existing Historic Area Statements.
25/26 Budget Reconsideration (if applicable)	Not as a result of this report
Ongoing Costs (eg maintenance cost)	Not as a result of this report
Other Funding Sources	The State Government provided funding of up to \$68,500 (with matching contribution from Council), to support the finalisation of the Historic Area Statement Code Amendment by 30 June 2025.

DISCUSSION

Purpose

1. The purpose of this report is to seek endorsement of the Historic Area Statement Update Code Amendment (the Code Amendment) (**Attachment A**) that has been amended following public consultation (**Attachment B**).
2. The Code Amendment is being undertaken as per the State Government's statutory Code Amendment process.



Code Amendment Process

3. Steps undertaken to date include:
 - 3.1. Council endorsed the 'Proposal to Initiate' for the Historic Area Statement Update Code Amendment on 8 August 2023 ([Link 3](#)).
 - 3.2. The Minister for Planning, the Hon. Nick Champion MP, endorsed the Proposal to Initiate the Historic Area Statement Update Code Amendment on 16 November 2023.
 - 3.3. On 10 September 2024 Council endorsed the draft Code Amendment for public consultation ([Link 1](#)).
 - 3.4. The draft Code Amendment was open for public consultation from 28 October 2024 until 9 December 2024. The consultation draft of the Code Amendment is provided in [Link 4](#).
 - 3.5. On 6 August 2024, a workshop was conducted with Council Members at the City Planning, Development, and Business Affairs Committee (the Committee) to provide an update on the Code Amendment ([Link 5](#)).
 - 3.6. A report was presented to the Committee on 4 March 2025 seeking endorsement of the Engagement Report and amended Code Amendment ([Link 2](#)).
 - 3.7. The Committee heard three deputations and deferred the matter pending further advice from the Administration in relation to the deputations.

Background

4. The existing Historic Area Statements were prepared by the State Planning Commission as part of the introduction of the Planning and Design Code in March 2021.
5. Council determined through its 2024-2028 Strategic Plan and its submission to the Planning System Implementation Review (PSIR) in January 2023 that stronger heritage protection is desirable to maintain the unique character of parts of the city and North Adelaide.
6. Council's submission to the PSIR sought to fast track an update to the Historic Area Statements (HAS) as a 'quick win' in creating stronger protection for historic buildings.
7. This was supported by the Minister for Planning who on 17 March 2023, wrote to all councils supporting an update of the Statements for Historic Areas and Character Areas (the City of Adelaide does not have the latter).
8. The State Government subsequently made a funding contribution of \$68,500 towards the Code Amendment.
9. With this background in mind, the report recommends an approach to the Code Amendment that provides the maximum protection available under the *Planning, Development, and Infrastructure Act 2016* (SA) (PDI Act).
10. This Code Amendment does not include new Historic Areas or Character Areas. Under the 'Proposal to Initiate' the scope did not propose any additional Historic Areas or to modify existing boundaries. New historic areas are being pursued separately by the City of Adelaide.

11. Additional Local Heritage Places are also not within the scope of this Code Amendment and are being pursued separately by the City of Adelaide through its Code Amendment program.

Summary of Consultation

12. Public consultation on the draft Code Amendment opened on 28 October 2024 and closed on 9 December 2024 (6 weeks).
13. A total of 44 submissions were received from community groups, residents, and individuals during the public consultation period.
14. Sixteen of the proposed 55 Representative Building owners objected to their proposed listing.
15. The consultation outcomes are detailed in the report to the City Planning, Development and Business Affairs Committee (the Committee) on 4 March 2025 ([Link 2](#)).
16. The Engagement Report, including information about the deputations, is provided in **Attachment B**.

Representative Buildings

17. Representative Buildings are buildings that display characteristics of importance in a particular area. They support development assessment in the Historic Area Overlay by providing examples of desirable built form and streetscape characteristics.
18. Representative Buildings were introduced by the State Government when 'Contributory Items' contained in former Development Plans were transitions to the Code.
19. The CoA did not have Contributory Items and consequently no buildings in the City of Adelaide are currently designed as Representative Buildings.
20. Identifying Representative Buildings can assist in:
 - 20.1. Interpreting the desired attributes and characteristics identified in the Historic Area Statements.
 - 20.2. Clarifying the degree of assessment and information required to accompany an application for development including demolition.
21. Representative Buildings guide design and development assessment by clearly signalling building elements, scale and materials that contribute to the historic character of an area.
22. On 4 March 2025 ([Link 2](#)), the Committee heard three (3) deputations relating to the proposed identification of the following buildings as Representative Buildings:
 - 22.1. 66 Mills Terrace, North Adelaide
 - 22.2. 47 Stanley Street, North Adelaide
 - 22.3. 424 Gilles Street, Adelaide.
23. Administration subsequently received further advice regarding 99 Palmer Place, North Adelaide seeking to be removed from identification as a Representative Building.
24. At its meeting held on 11 March 2025 ([Link 6](#)), Council resolved that it:
 - 24.1. *Defers consideration of the matter pending further advice from the administration in relation to the submissions from the deputations received at the City Planning, Development and Business Affairs Committee on 4 March 2025.*
25. Following Council's decision, Administration engaged Grieve Gillett Architects (GGA) to independently review the 16 objector Representative Buildings (refer to Workshop Item 6.1 on the Agenda).
26. Based on their review, GGA has recommended that six (6) of the 16 properties objected to warrant the proposed Representative Building list status:
 - 26.1. 174 Ward Street, North Adelaide
 - 26.2. 25 Mann Terrace, North Adelaide
 - 26.3. 293 Halifax Street, Adelaide
 - 26.4. 301 Halifax Street, Adelaide
 - 26.5. 305 Halifax Street, Adelaide
 - 26.6. 307 Halifax Street, Adelaide.

Options for Protection of Historic Areas

27. This report presents three options for Council's consideration in progressing the Code Amendment:
- 27.1. Option 1 – Include Representative Buildings as supported by the independent assessment.
 - 27.2. Option 2 – List only properties supported by the owners as Representative Buildings.
 - 27.3. Option 3 – Do not include Representative Buildings within the Historic Area Statements.
28. All Options result in improved Historic Area Statements which are more detailed than currently exists and provide further guidance for development assessment, the difference being the approach to Representative Buildings.

Option 1 – Include Representative Buildings as supported by the independent assessment:

29. Option 1 will result in 45 Representative Buildings being introduced in the Code. It:
- 29.1. Provides the maximum protection of historic character available under the PDI Act for Historic Areas.
 - 29.2. Introduces Representative Buildings as envisaged by the Code and used in other local government areas.
 - 29.3. Clarifies the degree of assessment and information required to accompany an application for development of the Representative Building including demolition.
 - 29.4. Provides the most comprehensive information available for guiding desired attributes and characteristics for non-designated buildings in the Historic Area.

Option 2 – List only properties supported by the owners as Representative Buildings:

30. Option 2 will result in 39 Representative Buildings being introduced in the Code. It:
- 30.1. Provides comprehensive protection of historic character available under the PDI Act for Historic Areas.
 - 30.2. Introduces Representative Buildings as envisaged by the Code and used in other local government areas.
 - 30.3. Clarifies the degree of assessment and information required to accompany an application for development, including demolition, of the Representative Building.
 - 30.4. Provides the comprehensive information available for guiding desired attributes and characteristics for non-designated buildings in the Historic Area.
31. If Council decides to list only properties where the owner supports the listing, this approach:
- 31.1. Sets a precedent for other heritage-related Code Amendments, and could put at risk the Council's objective of increasing heritage protection.
 - 31.2. Lessens the ability for the community and development assessment process to seek new or replacement buildings that reinforce the prevailing character.

Option 3 – Do not include Representative Buildings within the Historic Area Statements:

32. Option 3 will result in no Representative Buildings being introduced in the Code. It:
- 32.1. Sets a precedent for future Code Amendments seeking to create new Historic Areas.
 - 32.2. Lessens the ability for the community and development assessment process to seek new or replacement buildings that reinforce the prevailing character.

Recommended Option

33. In response to the public consultation feedback and an independent review of the 16 objector Representative Buildings by GGA, the Code Amendment in **Attachment A** has been amended to remove the following 10 proposed Representative Buildings:
- 33.1. 123 Barnard Street, North Adelaide
 - 33.2. 171 Barnard Street, North Adelaide
 - 33.3. 66 Mills Terrace, North Adelaide (subject of a deputation)
 - 33.4. 112 Brougham Place, North Adelaide
 - 33.5. 99 Palmer Place, North Adelaide
 - 33.6. 39-40 Kingston Terrace, North Adelaide

- 33.7. 41 Kingston Terrace, North Adelaide
 - 33.8. 43 Kingston Terrace, North Adelaide
 - 33.9. 47 Stanley Street, North Adelaide
 - 33.10.424 Gilles Street, Adelaide.
34. Minor editorial changes to the Historic Area Statements, including the removal of reference to the school oval on Gover Street, North Adelaide as it is not part of the area's historic character, are also made in **Attachment A**.

Next Steps

- 35. Pending Council's decision, the Code Amendment and Engagement Report will be sent to the Minister for Planning for approval.
- 36. If the Minister decides to adopt the Code Amendment it is then referred to the Environment Resources and Development Committee (ERDC) in Parliament within 28 days of the Code Amendment taking effect.
- 37. Following the outcome of the statutory processes, the Administration will close the public consultation process in accordance with its Engagement Plan.

DATA AND SUPPORTING INFORMATION

Link 1 – [Minutes, Council Meeting, Tuesday 10 September 2024](#)

Link 2 – [Agenda - City Planning, Development and Business Affairs Committee, Tuesday, 4 March 2025](#)

Link 3 – [Minutes, Council Meeting, Tuesday, 8 August 2023](#)

Link 4 – [Draft Historic Area Update Code Amendment – Consultation Version](#)

Link 5 – [Workshop City Planning, Development and Business Affairs Committee, Tuesday, 6 August 2024](#)

Link 6 – [Minutes Council Meeting, Tuesday 11 March 2025](#)

ATTACHMENTS

Attachment A – Amendments to the Planning and Design Code for the Historic Area Statement Update Code Amendment

Attachment B – Historic Area Statement Update Code Amendment Engagement Report

- END OF REPORT -