**REPRESENTATION ON APPLICATION**

*Planning, Development and Infrastructure Act 2016*

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| **Applicant:** | Wee Hur Australia Pte Ltd |
| **Development Number:** | 24003065 |
| **Nature of Development:** | Notified Elements: Other - Residential & ShopDescription: Partial demolition and adaptive reuse of a Local Heritage Place and construction of a multi-level student accommodation building with ancillary shop/cafe on the ground floor and associated amenities, services, underground water tank and landscaping |
| **Zone/Sub-zone/Overlay:** | Capital City Zone |
| **Subject Land:** | 188-196 Grenfell St Adelaide SA 5000Titles:CT5962/461CT6121/144Plan parcels:D38968AL5D38968AL4 |
| **Contact Officer:** | Assessment Panel/Assessment Manager at State Planning Commission |
| **Phone Number:** | +61 1800 752 664 |
| **Close Date:** | Friday, 10 May 2024 at 11:59 pm Australia/Adelaide |

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| My name\*:  | My phone number:  |
| My postal address\*:  | My email:  |

*\* Indicates mandatory information*

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| My position is: | [ ]  I support the development[ ]  I support the development with some concerns (detail below)[x]  I oppose the development |

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| I oppose the development because:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Our city prides itself on its live music culture. We have even been recognised as a UNESCO City Of Music. The Crown & Anchor is a vital part of that history and is critical to its future.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_These cultural and heritage qualities have not been considered by the development proposal.The Capital City Zone seeks for vibrant land uses, and the Crown & Anchor is the embodiment of this. It is a vital part of our city’s cultural heritage. The plans to demolish everything but the façade is a mockery of heritage protection and destroys the things that make the Crown & Anchor so important for SA’s cultural heritage.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_The specific reasons I believe that consent should be refused are:I consider that proposal also fails to meet the **Local Heritage Place Overlay**. More specifically:* **Preservation Failure**: The proposal guts all but two walls of the heritage-listed Crown & Anchor, failing to maintain its heritage and cultural values as sought by Desired Outcome 1 (DO1) in the Overlay, which emphasises and prioritises conservation and ongoing use, over adaptive reuse and demolition. The entire site was Local Heritage Place listed with no exclusions i.e. not just the facade is protected.
* **Heritage Value Reduction**: The Overlay recognizes that heritage value encompasses more than just physical structure, including the preservation of cultural values tied to historical and significant use.
* **Misuse of Adaptive Use**: Adaptive use, intended for disused buildings as is clearly stated in PO 2.2, is unnecessary here as the Crown & Anchor continues to function actively as a pub and music venue, making its current use essential to its heritage value.
* **Design Insensitivity**: The proposed 19-story tower fails to maintain heritage values (PO 1.1, PO 1.2, PO 1.3), appearing as an insensitive addition that clearly dominates the original structure and disrupts the aesthetic and cultural fabric of the East End precinct. The development is also over-height for the zone.
* **Destruction of Character**: The development fundamentally changes the building from a vibrant historical site to a soulless façade, stripping it of its cultural values and ongoing use. Key historical features linked back to colonial times, such as the original water well and stable walls, would be lost in the demolition.
* **Loss of Key Features**: The development plans include demolishing significant interior features such as the historic pub interior, original well, the band stage and dance floor, and original stable walls, are all crucial to the building’s cultural heritage (PO 1.7). The original well may also be an *archaeological artefact* for the purposes of the *Heritage Places Act 1993* and is therefore subject to further special protections in ss 26-28.
* **Inadequate Adaptive Reuse**: The proposed 'adaptive reuse' does not respect or reference the original and ongoing use of the Crown & Anchor, as outlined in PO 2.2. Introducing a small-scale retail store and waste room within the new structure fails to align with the building’s historical and continuous role or contribute similarly to the public realm.
* **Demolition of Local Heritage Place:** PO 6.1 states that Local Heritage Places must not be demolished in total or in part unless the portion demolished is excluded from the heritage listing. The heritage listing for the Crown and Anchor Hotel does not note any exclusions, therefore the entire building must remain intact.
* **Failed Design Quality**: This proposal does not
	+ contribute to the existing quality and future character of the space
	+ add value by creating desirable places that promote community investment
	+ sustain or support the long-term economic productivity of the place

per State Planning Policy (SPP) 2.1 in applying the principles of Good Design. The development proposal itself is of further low quality as it has failed to recognise the unique character of the place and does not even attempt to identify its valued physical attributes per SPP 2.8. It also does not respect the characteristics of the surrounding East End as in SPP 2.9.The applicant’s interpretation of the **Local Heritage Place status** of the building is fundamentally flawed and attempts to skip over 30 years of law. The Local Heritage Place listing includes *the entire* Crown And Anchor Hotel with no exclusions. The applicant’s attempt to argue that only the facade is protected is a fallacy that calls back to a now several times replaced local council ‘Townscapes’ scheme from 1992. They have argued that the absence of a heritage survey at the time of Local Heritage Place listing in 2001 implies that the listing was due solely to a townscapes assessment from a decade prior. There is no basis in law for this assumption. The Local Heritage Place quality is defined by the existence of the listing itself, and all aspects of heritage must specifically be accounted for in the development proposal. In other words, the applicant has not adequately justified the planned demolition of all but the facade. They have made no legal arguments to justify this.The aforementioned are significant and fatal errors in the proposed development. As such, the development *must* be rejected.The Crown and Anchor Hotel has recently been granted **provisional State Heritage Place designation**. The applicant has not justified their proposal against this status or heritage qualities. With consideration for *Planning, Development and Infrastructure Act 2016* s 132(4), the proposal *must* be rejected.I am also concerned about the precedent that would be set for the future of Adelaide by approving this proposal, and what signal this sends to its citizens. This development proposal makes a mockery of the planning and heritage system. If something as old and so beloved as the Crown & Anchor can simply be purchased and all but demolished, then what use are heritage laws and who is being served by South Australia’s planning system? It would certainly not be the people that live in, and love, Adelaide. |

[*attach additional pages as needed]*

Note: In order for this submission to be valid, it must:

* be in writing; and
* include the name and address of the person (or persons) who are making the representation; and
* set out the particular reasons why consent should be granted or refused; and
* comment only on the performance-based elements (or aspects) of the proposal, which does not include the: N/A

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| I: | [x]  wish to be heard in support of my submission\*[ ]  do not wish to be heard in support of my submission |
| By: | [ ]  appearing personally[x]  being represented by the following person:  |

*\*You may be contacted if you indicate that you wish to be heard by the relevant authority in support of your submission*

Signature: Date:

Return Address: The Secretary, State Commission Assessment Panel, GPO Box 1815, Adelaide SA 5001

Email: spcapplications@sa.gov.au

Complete online submission: [plan.sa.gov.au/have\_your\_say/notified\_developments](https://plan.sa.gov.au/have_your_say/notified_developments)