



Date: 20th June 2025

To: [REDACTED]
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From: John Byleveld Architects (JBA)

Re: Response to State Heritage Nominations for No. 1 Cargo Shed (Place No. 26461),
Fisherman's Wharf, Port Adelaide

Executive Summary

This submission, prepared on behalf of the site owner, provides a comprehensive response to the recently lodged nominations for No. 1 Cargo Shed (formerly the Fishermen's Wharf Market Building), Port Adelaide. These nominations fail to present new or substantive evidence of State Heritage significance and instead rely on previously assessed and dismissed claims.

1. Lack of Change Since Previous Assessment

Under the Heritage Places Act 1993 (SA), Section 16, places may be entered in the Register only if they satisfy at least one of seven criteria for heritage significance. The prior independent Heritage Assessment prepared by Swanbury Penglase Architects (c.2016), which remains the most detailed and authoritative evaluation to date found that No. 1 Cargo Shed does **not** meet **any** of the criteria (a) through (g). These findings remain valid, with:

- No significant alterations to the physical structure or its context since the prior rejection;
- No new archaeological or documentary evidence presented; and
- No unique architectural, aesthetic, technical, cultural, or associative attributes uncovered.

The nominations rely upon previously discounted themes, such as community association and maritime history, without addressing the fundamental deficiencies previously identified. The *Guidelines for Interpreting State Heritage Criteria (2024)* require clear, demonstrable evidence that meets the threshold for **State-level** significance. These are not met in either nomination.

2. Contextual Misrepresentation & Loss of Integrity

The 2016 Swanbury Penglase report correctly notes the structure has been **substantially altered**, including truncation, additions of mezzanines, balconies, and glass entries that obscure original forms. It has also lost its visual and functional association with the suite of wharf sheds which gave it any contextual maritime relevance.

Moreover, the site is primarily built on **1950s dredged fill** to realign Queen's Wharf with McLaren Wharf – not on original 19th-century wharf alignments. Assertions of archaeological potential are speculative and without evidentiary support. Indeed, unlike Shed 2 (built on the original McLaren Wharf), Shed 1 lacks both depth of history and archaeological substrate.



3. Comparative Analysis & Better Representatives Elsewhere

The Dock 2 sheds, wharf infrastructure, and cranes provide a vastly superior and intact representation of Port Adelaide's industrial maritime era. These assets:

- Demonstrate the full operation of shipping and cargo handling;
- Retain strong spatial, visual and functional integrity; and
- Have greater documentary and social evidence supporting significance.

By contrast, Cargo Shed No. 1 does not meet the applicable criteria for State Heritage listing due to its isolation, substantial alterations, and lack of demonstrable, State-level significance.

4. Community Association Claims Overstated

While the building operated as a weekend market for a time, its function was commercial, not civic or ceremonial. It lacks enduring community rituals or spiritual association as required under Criterion (f). Use of the site for isolated events, such as tall ships or royal visits, cannot confer significance on a building not integral to those events.

The Guidelines exclude places from Criterion (f) where associations are:

- Commonplace,
- Recent,
- Not strongly held, or
- Not demonstrably unique to the place.

All apply here.

5. Concluding Position

On behalf of the owner, JBA asserts that these nominations:

- Present no new material;
- Rely on already discredited grounds;
- Misapply the State Heritage Criteria;
- Seek to undermine planning outcomes achieved through public, professional, and governmental processes.

Given the absence of new material evidence and the failure to satisfy State Heritage thresholds, there is no justification for proceeding to provisional listing. We respectfully urge the Heritage Council to uphold the intent and standards of the Heritage Places Act 1993 by **rejecting the nominations outright**. Should any further clarification or supporting material be required, John Byleveld Architects remains available to assist.

Yours Sincerely,

John Byleveld

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Addendum – Response to Third Nomination (23 June 2025)

This third nomination reiterates prior arguments about the historic role of Port Adelaide in South Australia's development while introducing a new focus on the **Port Adelaide Centre Joint Committee (PACJC)** and its activities during the 1970s and 1980s. It asserts that the Cargo Shed is closely associated with this period of urban revitalisation and therefore meets Criterion (a) of the Heritage Places Act 1993.

However, this argument does not meet the threshold for State Heritage listing for the following reasons:

1. **PACJC's significance does not reside in this structure**

While the PACJC played an important strategic role in Port Adelaide's revitalisation, its work is **not uniquely or demonstrably embodied** in Cargo Shed No. 1. The nomination itself notes that the PACJC sold the shed into private hands due to funding constraints. If anything, the shed's later market reuse was **commercial and incidental**, rather than integral to the PACJC's core contributions (such as the Maritime Museum, lighthouse relocation, or restoration of earlier buildings).

2. **Adaptive reuse for a market is not heritage-defining**

The nomination overstates the significance of the market era, suggesting that the temporary economic benefits of weekend trade confer long-term heritage value. While the market was a popular local attraction, such use does **not constitute a lasting cultural phase** that meets State criteria under the 2024 Guidelines. Many buildings are repurposed successfully without those uses becoming heritage-defining.

3. **Continued absence of fabric association with historical themes**

Even if one were to accept the PACJC's historical significance, the nomination does not demonstrate how Cargo Shed No. 1 **physically embodies** or illustrates that significance through its built form, integrity, or historical narrative. The 2024 Guidelines for Criterion (a) explicitly state that:

"The place should be closely associated with events... and ideally it should demonstrate those associations in its fabric."

As the earlier Swanbury Penglase assessment confirms, much of this shed's original context, fabric and setting has been lost or altered beyond interpretive recognition.

4. **Misplaced comparison to No. 2 Dock listing**

The nomination compares Shed 1 to the listing of Dock 2 and its cranes. This comparison is inapposite. Dock 2 remains an intact, contiguous precinct with wharf structures, cranes, rail alignments, and working port infrastructure. Shed 1 by contrast stands **in isolation, altered, and lacking integrity** in form or setting. It does not offer comparative or representative value.



5. **Conclusion: planning history ≠ State heritage significance**

The broader planning history of Port Adelaide is already well acknowledged through the Port Adelaide State Heritage Area. Individual buildings must still meet the thresholds for **distinct State-level significance**, which Cargo Shed No. 1 demonstrably does not.