

9.2 AMENDMENT TO THE MUNICIPAL HERITAGE INVENTORY: 40 GUILDFORD ROAD, MOUNT LAWLEY

- Attachments:**
1. **Submission Letter**
 2. **Main Roads Approved Land Dealings Plan - Guildford Road and East Parade**
 3. **Applicant's Heritage Impact Statement**
 4. **Photographic Archival Record**
 5. **Applicant's Response to Design Review Panel's Comments**
 6. **Applicant's Response to Administration Comments**
 7. **Summary of Submissions**

RECOMMENDATION:**That Council:**

1. **RESOLVES that No. 40 (Lots 254 and 403) Guildford Road, Mount Lawley be removed from the City's Municipal Heritage Inventory (MHI) pursuant to Schedule 2, Part 3, Clause 8(3)(d) of the *Planning and Development (Local Planning Schemes) Regulations 2015*; and**
2. **NOTES that Administration will notify the Heritage Council of Western Australia and the owner of the place of this decision pursuant to Schedule 2, Part 3, Clause 8(4) of the *Planning and Development (Local Planning Schemes) Regulations 2015*.**

PURPOSE OF REPORT:

For Council to consider a request to remove No. 40 Guildford Road, Mount Lawley from the City's Municipal Heritage Inventory.

BACKGROUND:

In July 2023, the City received an application from a planning consultancy acting on behalf of the Department of Planning, Lands and Heritage (DPLH) for the removal of No. 40 Guildford Road, Mount Lawley (the subject site) from the City's Municipal Heritage Inventory (MHI). The applicant's supporting report for the proposal is included as **Attachment 1**.

The subject site contains a single-storey brick and corrugated zincalume residence designed in the Federation Queen Anne style and was constructed circa 1904.

In 2000 the subject site was added to the City's MHI and is currently listed as a Management Category B – Conservation Recommended.

In August 2007, a request was received from Main Roads Western Australia (MRWA) for the demolition of the house on the subject site. The City conducted a review at the time and determined the subject site met the threshold for its retention on the MHI. As part of this review, the following Statement of Significance was prepared:

The house at 40 Guildford Road is a substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity.

At its [4 December 2007 Ordinary Meeting](#), Council resolved to retain the subject property as Management Category B - Conservation Recommended on the MHI. This listing affords the property statutory protection as a heritage listed place. The subject site abuts Guildford Road, which is reserved for Primary Regional Roads (PRR) under the Metropolitan Region Scheme (MRS).

As shown in Figures 1 and 2 included below, MRWA has additional land requirements beyond the existing PRR reserve which will impact the subject site. The applicant has advised that the final MRS reservation reflecting these additional land requirements will be gazetted through an omnibus amendment following construction of the road upgrades. The applicant has also advised that to ensure the land is protected, Department of Planning, Land and Heritage (DPLH) have agreed with MRWA for the required road widening to be excised and set aside through a plan of subdivision which is currently being prepared for lodgement with the WAPC.



Figures 1 and 2: Primary Regional Road Reservation - Ultimate Land Requirements

The subject site forms part of a wider government landholding comprising 34 lots situated along Guildford Road and East Parade. A plan showing these 34 lots is included within the applicant's report (**Attachment 1**). These lots have been identified for the delivery of social housing as part of the State Government [Housing Diversity Pipeline \(HDP\) program](#). The form and scale of the future development has not yet been determined.

The subject site is zoned Residential R100 under the City's Local Planning Scheme No. 2, and is located within the Transit Corridor Built Form Area and has a building height limit of three storeys under Policy No. 7.1.1 – Built Form.

The DPLH has advised that following Council's determination, the State Government will be inviting detailed proposals from proponents for the next stage of the Mount Lawley HDP project. This project will enable the renewal of vacant land along Guildford Road and East Parade and provide for additional social housing.

DPLH deem the demolition of the dwelling on the subject site necessary to achieve the aims of the HDP program as well as cater for future widening of Guildford Road. The approved extension of Guildford Road is shown in **Attachment 2**.

In support of the application, the applicant has provided a Heritage Impact Statement (**Attachment 3**), and a Photographic Archival Record (**Attachment 4**).

DETAILS:

Administration, in consultation with City's Design Review Panel heritage specialist member, assessed the proposal in accordance with:

- Local Planning Policy No. 7.6.2 – Heritage Management – Assessment (LPP 7.6.2);
- Local Planning Policy No. 7.6.5 – Heritage Management – Amendments to the Municipal Heritage Inventory (MHI) (LPP 7.6.5); and
- The Heritage Council of Western Australia (HCWA) Guidelines for the Assessment of Local Heritage Places.

LPP 7.6.5 outlines the following three scenarios for the deletion of a property from the MHI:

1. Cultural Heritage Significance

The cultural heritage significance of the place in the existing heritage assessment was erroneous.

2. Condition

The poor state of a place should not in itself be a reason for removal from MHI. Deletion of a place from MHI will only be considered if a structural condition report conducted by a registered structural engineer states that the structural integrity of the place has failed to the point where it cannot be rectified without the removal of a majority of its significant fabric.

3. Social or Historic Significance Only

Where the heritage value is historic and/or social only, the owner/applicant can demonstrate that it cannot practically be retained in its entirety or in part because:

- (a) The location of the building on the site; or
- (b) The limited Vehicular Access to the site and non-compliance with Australian Standards; or
- (c) The inability to comply with the National Construction Codes Series e.g. ramps, corridor widths etc.; or
- (d) The inability of the existing building structure or materials to be incorporated into the new development; or
- (e) The inability of the existing building to support additional height and bulk to the intention of the locality as prescribed in the relevant planning policy.

A summary of the DRP member's heritage assessment is included below.

- The subject site is a Category B place on the City's MHI meaning that it is on the heritage list and 'conservation is recommended'. It was originally listed in 2006 as a 'substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity'. This Statement of Significance identified its aesthetic value as a Federation Arts and Craft building and therefore has more than just 'social and historic' significance as detailed in Figure 1 of LPP 7.6.5.
- Over the last 17 years the subject site has been neglected, which has resulted in degradation of the building and a significant loss of its heritage values. The Heritage Impact Statement prepared by Hocking Heritage + Architecture in 2023 (**Attachment 2**) states that the building is in a very poor condition and supports demolition. There is no structural engineer's report that supports the assessment of condition or whether the remediation of the building would impact on its significance.
- The property could be restored back into a residential function without irreversible impact to the significance of the property. However, the road widening is a relevant consideration for future development proposals, if the façade of the building was demolished then it would have an irreversibly negative impact on the significance of the place.

The DRP member's comments and assessment against LPP 7.6.5 as well as the applicant's response is included in **Attachment 5**.

In response to the DRP member's comments, the applicant provided further information on the planned road widening of Guildford Road. These are summarised below.

- The subject lot was originally acquired by the State for the purpose of delivering major road upgrades along Guildford Road and East Parade. Other properties acquired for the same purpose have previously been demolished in preparation for the future upgrades.
- The subject dwelling has been retained as far as practicable in the interim to allow for the final land requirements to be determined in order to understand the impact to the dwelling and the potential for retention.
- The primary frontage of the dwelling including the front room, steps, verandah and associated footings encroach into the road reserve (refer Figure 1).

- The ultimate changes to the street layout and the proximity of the dwelling to the street edge will fundamentally alter the context and relationship of the dwelling to the streetscape, further diminishing its authenticity, original character and historic value.

The applicant's response in detail is found in **Attachment 6**.

LPP 7.6.4 Heritage Management – Interpretation

In accordance with clause 4.1 of LPP 7.6.4, applicants are required to prepare an interpretive plaque or an alternative interpretive proposal. In response the applicant has provided a photographic archival record found in **Attachment 4**.

CONSULTATION/ADVERTISING:

Community consultation was undertaken from 28 July to 18 August 2023 in accordance with Community and Stakeholder Engagement Policy and included the following:

- Advertisement placed in the Perth Voice newspaper;
- A sign placed on site;
- Notice displayed on Imagine Vincent website.
- Letters were sent to adjoining and adjacent neighbours in accordance with the Community and Stakeholder and Engagement Policy; and
- A referral being sent to the heritage division of the Department of Planning, Lands & Heritage.

Seven submissions were received from the community, three in support of the property's removal from the MHI and four objecting. One submission was received from the heritage division of the DPLH which noted that the place is not in the State Register of Heritage Places, is not in the vicinity of a place on the Register, is not subject to a heritage agreement, and is not identified as a place warranting assessment by the Heritage Council.

The submissions in support of the property's removal noted its current state of disrepair and antisocial activities which have occurred in the property.

The submissions opposing the property's removal referred to the need to retain the City's heritage and that the property's current condition has been caused through demolition by neglect. Concerns were also raised regarding the potential loss of mature vegetation from the redevelopment of the Mount Lawley HDP site.

A summary of submissions, including a response from Administration and the applicant is included in **Attachment 7**.

LEGAL/POLICY:

- *Heritage Act 2018*;
- *Planning and Development (Local Planning Schemes) Regulations 2015*;
- City of Vincent Local Planning Scheme No. 2;
- Local Planning Policy No. 7.6.2 – Heritage Management – Assessment;
- Local Planning Policy 7.6.4 – Heritage Management – Interpretation; and
- Local Planning Policy No. 7.6.5 – Heritage Management – Amendments to the Municipal Heritage Inventory (MHI).

RISK MANAGEMENT IMPLICATIONS

Low: It is low risk for Council to remove the place from the MHI.

STRATEGIC IMPLICATIONS:

This is in keeping with the City's *Strategic Community Plan 2022-2032*:

Connected and Healthy Community

We are an inclusive, accessible and equitable City for all.

Thriving Places

We encourage innovation in business, social enterprise and imaginative uses of space, both public and private.

Sensitive Design

Our planning framework supports quality design, sustainable urban built form and is responsive to our community and local context.

Innovative and Accountable

We engage with our community so they are involved in what we are doing and how we are meeting our goals.

FINANCIAL/BUDGET IMPLICATIONS:

There are no budget implications to remove the place from the MHI.

COMMENTS:

Administration is of the opinion that the dwelling's current degraded state has been caused through neglect and that the dwelling could be restored without impacting its significance.

Notwithstanding the above, MRWA's ultimate land requirements to facilitate future upgrades to Guildford Road and East Parade will necessitate partial demolition and substantial modification of the existing dwelling. This is due to the location of the dwelling on the site. The extent of demolition and modification will have a material impact on the fabric of the existing dwelling such that the original character, authenticity and significance of the dwelling will be irreversibly impacted and cannot practically be retained. The removal of the place from the MHI can be supported against Clause 3(a) of LPP 7.6.5 for this reason.

If determined by Council consistent with the officer recommendation, Administration will notify the HCWA and the owner of the place of this decision pursuant to Schedule 2, Part 3, Clause 8(4) of the *Planning and Development (Local Planning Schemes) Regulations 2015*. Administration will also notify those who made a submission.

Our Ref: 23-212

5 September 2023

Chief Executive Officer
 City of Vincent
 244 Vincent Street
 LEEDERVILLE WA 6902

Attention: Karsen Reynolds – Coordinator Planning Services

Dear Karsen,

PROPOSED DEMOLITION OF EXISTING HERITAGE LISTED SINGLE DWELLING – LOTS 254 & 403 (NO. 40) GUILDFORD ROAD, MOUNT LAWLEY

element acts on behalf of the Department of Planning, Lands and Heritage ('DPLH') in relation to the above matter. Please find enclosed an Application for Development Approval for the demolition of the existing residential dwelling situated on Lots 254 & 493 (No. 40) Guildford Road, Mount Lawley (the 'subject site').

In accordance with the City of Vincent's requirements, please find enclosed:

- A completed and signed City of Vincent Application for Development Approval form;
- A completed and signed MRS Form 1;
- A current copy of the Certificate of Title for the subject site;
- A copy of the proposed demolition plan; and
- Supporting justification contained within this correspondence.

1.0 SITE DETAILS

The subject site comprises two (2) lots, legally defined as set out in Table 1 below.

Table 1 – Certificate of Title Details

Lot	Plan	Vol	Folio	Street Address	Land Area	Registered Proprietor
403	31182	2209	507	40 Guildford Road, Mt Lawley	312m ²	WA Planning Commission
254	2001	2209	507	40 Guildford Road, Mt Lawley	417m ²	WA Planning Commission

Refer Attachment One – Certificate of Title.

The subject site forms part of a wider government landholding comprised of 34 lots situated along Guildford Road and East Parade (Attachment Two) which have been identified for the delivery of social housing as part of the Housing Diversity Pipeline.



2.0 BACKGROUND – THE HOUSING DIVERSITY PIPELINE

The Housing Diversity Pipeline (HDP) is part of the State Government’s commitment to improve the quality and accessibility of social housing in Western Australia. Several agencies including DPLH) are working collaboratively to identify and offer suitable surplus Government-land to the market for innovative housing developments that provide for social housing and deliver more housing choice for our communities.

Project delivery methods may include (but are not limited to) long-term ground leases, partnership models, and design and construct models for either build-to-rent or build-to-sell housing. All developments must deliver a minimum of 20 per cent of social housing dwellings across the development.

The broader landholding (herein referred to as the “Mount Lawley HDP site”) of which the subject site forms a part was one of nine sites released to market through an Expression of Interest (EOI) process in August 2022. The EOI process has been completed and the shortlist of respondents to progress to the next phase of procurement has been approved and successful proponents have been informed.

The Mount Lawley HDP site received submissions that were shortlisted. The next stage will involve a request for detailed proposals where multiple suitable proponents have been shortlisted, or a direct negotiation process where only one proponent has been shortlisted. The Mount Lawley HDP site received submissions that were deemed to meet the State Government’s social housing objectives and will proceed to this stage.

3.0 PROPOSED DEMOLITION

This Development Application proposes the full demolition of the existing residential dwelling and all associated infrastructure at the subject site to facilitate comprehensive re-development of the wider Mount Lawley HDP site.

For reasons that will be detailed in this submission, full demolition of the existing residential dwelling is proposed (i) for the purpose of improving housing choices and access to suitable and affordable homes – particularly for the most vulnerable, and (ii) to accommodate road widening required for the delivery of major road upgrades at the Guildford Road / East Parade intersection.

The form and scale of the development has not been determined at this stage and will be subject to detailed design development as part of the next stage of the procurement process.

4.0 ZONING AND RESERVATIONS

Metropolitan Region Scheme

The Metropolitan Region Scheme (‘MRS’) is the overriding statutory land use planning scheme for the Perth Metropolitan Region and provides the legal basis for the applicable development control and use of land at the regional level.

Under the provisions of the MRS, the subject site is zoned ‘Urban’ (Figure 1).

Road Widening Requirement

The subject site abuts Guildford Road, which is reserved for ‘Primary Regional Roads’ (PRR) under the MRS (Figure 1).

The subject lot was originally acquired by the State along with all other properties fronting Guildford Road between Stanley Street and Pakenham Street in 1997 to allow for upgrades to Guildford Road and East Parade. Between 2000 and 2001 minor upgrades were complete for the addition of a turning lane on Guildford Road.

Land has previously been excised from the subject lot and set aside for road reserve abutting Guildford Road in preparation of future major capacity upgrades at the intersection of Guildford Road and East Parade. The current MRS reservation delineates additional land requirements for a number of lots along Guildford Road over and above the land which has previously been excised (Figure 1).



Figure 1 – Metropolitan Region Scheme

Main Roads WA (MRWA) has developed plans for the proposed ultimate upgrades at the Guildford Road / East Parade intersection and has issued an ultimate land take requirement plan for the required road widening which shows land requirements affecting the subject lot beyond the current extent of the PRR and beyond that of the land previously excised (Figure 2).

Refer Attachment Two – Endorsed Main Roads Land Take Requirements Plan

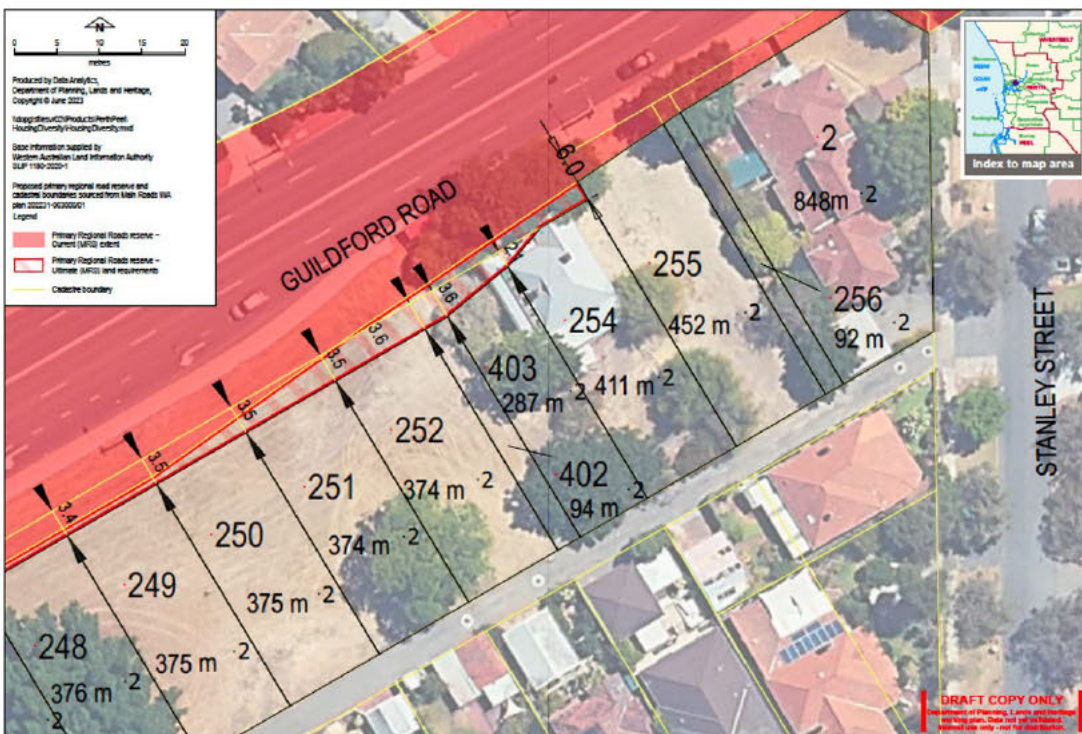


Figure 2 – Primary Regional Road – Ultimate Land Requirements

MRWA have advised that an MRS amendment to reserve the land as PRR will not be progressed prior to delivery of the road upgrades as there is no immediate need to protect the required land via a statutory mechanism due to the fact that the State is currently the sole landowner for all affected land. It is standard practice that the final MRS reservation will be gazetted through an omnibus amendment following construction of the road upgrades.

To ensure the land is protected, DPLH have agreed with MRWA for the required road widening to be excised and set aside through a plan of subdivision which is currently being prepared for lodgement with WAPC. A deposited Plan has been prepared for the subdivision showing the amalgamation of 34 lots abutting Guildford Road and East Parade between Stanley Street and Gardiner Street to create 4 balance lots for future redevelopment and set aside land for road widening. The extent of land proposed to be set aside for road widening is consistent with the current land take requirements plan issued by MRWA.

Refer Attachment Three – Draft Deposited Plan

Road Widening Impact

The planned road widening affecting the subject lot will necessitate modification of the existing dwelling to eliminate any encroachment into the future road reserve. The primary frontage of the dwelling including the front room, steps, verandah and associated footings will be an encroachment in the road reserve and require partial demolition and substantial modification.

The extent of these required modifications will have a material impact on the fabric of the existing dwelling such that it is considered the original character of the dwelling will be detrimentally impacted and cannot practically be retained. Figure 4 shows an overlay of the endorsed road widening requirements in relation to the surveyed location of the dwelling, highlighting the affected areas.

Refer Attachment Four – Road Widening Requirements Overlay



Figure 3 – MRWA Road Widening Overlay

City of Vincent Local Planning Scheme No. 2

The City of Vincent Local Planning Scheme No. 2 ('LPS 2') sets out the provisions for development control and land use within the City. Pursuant to the provisions of LPS 2, the subject site 'Residential' and has an applicable density coding of 'R100' as contemplated under the Residential Design Codes of WA (the 'R-Codes').

The objectives of the Residential zone as contemplated under LPS 2 are detailed below:

- *To provide for a range of housing and a choice of residential densities to meet the needs of the community;*
- *To facilitate and encourage high quality design, built form and streetscapes throughout residential areas;*
- *To provide for a range of non-residential uses, which are compatible with and complementary to residential development;*
- *To promote and encourage design that incorporates sustainability principles, including but not limited to solar passive design, energy efficiency, water conservation, waste management and recycling;*
- *To enhance the amenity and character of the residential neighbourhood by encouraging the retention of existing housing stock and ensuring new development is compatible within these established areas;*
- *To manage residential development in a way that recognises the needs of innovative design and contemporary lifestyles;*
- *To ensure the provision of a wide range of different types of residential accommodation, including affordable, social and special needs, to meet the diverse needs of the community.*

Lots 254 and 403 form part of an overall WAPC landholding comprising 34 lots (Mount Lawley HDP site), forming an area of approximately 13,638m² located alongside East Parade and Guildford Road, as detailed in the Figure 4 below.

The proposed demolition will facilitate the future development of the landholding, contributing significantly to housing choice and affordability in a key location in proximity to public transport and amenities.

Development of the land holdings which are predominately vacant will enhance amenity in the locality by activating an underutilised area and improve safety through removal of the existing dwelling at the subject site which is currently derelict.



Figure 4 – Landholding for Future Development

5.0 HERITAGE CONSIDERATIONS

City of Vincent Municipal Heritage Inventory

The City’s Municipal Heritage Inventory (‘MHI’) lists the existing dwelling at the subject site as a ‘Moderate Level of Significance’ which is described as:

Contributes to the heritage of the locality. Has some altered or modified elements, not necessarily detracting from the overall significance of the place.

Management Category B – Conservation Recommended

Consider for inclusion on the MHI (Heritage List) if owner/applicant consents to inclusion.

The City of Vincent prepared the following statement in 2006 with regard to the dwelling:

The house at 40 Guildford Road is a substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity.

The dwelling is in a state of disrepair and currently boarded up. Graffiti is evident internally and externally.

City of Vincent Heritage Management Local Planning Policies

Local Planning Policy 7.6.1: Heritage Management – Development Guidelines

The City’s ‘Local Planning Policy 7.6.1: Heritage Management – Development Guidelines for Heritage and Adjacent Properties’ (‘LPP 7.6.1’) seeks to assist owners in undertaking alterations and additions to places listed on the City’s MHI.

LPP 7.6.1 notes that planning approval from the City is required where demolition of a heritage place is proposed. Consistent with the requirements of the policy, this application seeks approval from the City for demolition of the existing dwelling at the subject site to facilitate the future development of social housing.

Local Planning Policy 7.6.4: Heritage Management – Interpretive Signage

As contemplated under the City’s ‘LPP 7.6.4 – Heritage Management – Interpretive Signage’ (‘LPP 7.6.4’), we understand that the City may require Interpretive Signage to recognise the history of the place as a condition of the approval. However, given a photographic archival record of the dwelling has been undertaken, this is considered adequate in terms of capturing the historical record of the site. No interpretation signage is considered necessary as part of the demolition and future redevelopment of the site.

Local Planning Policy 7.6.5: Heritage Management – Amendments to the Municipal Heritage Inventory

The City’s ‘LPP 7.6.5: Heritage Management – Amendments to the Municipal Heritage Inventory’ (‘LPP 7.6.5’) outlines that the City may consider amendments to the MHI through the Demolition Planning Application process. LPP 7.6.5 outlines where a building is requested to be removed from the MHI, at least one (1) of the following conditions must be met, as detailed in the table below.

Table 2 – Conditions for Removal of a Building from the Municipal Heritage Inventory

Policy Condition	Comment
<p>Cultural Heritage Significance</p> <p><i>The cultural heritage significance of the place in the existing heritage assessment was erroneous.</i></p>	<p>The cultural heritage significance of the place was not erroneous in 2007 when last assessed.</p> <p>It was noted at that time that the integrity of the historic setting had been compromised. Since then, the increased traffic on Guildford Road has led to an acceleration in the changes to the streetscape and its original neighbourhood context.</p> <p>In 2007, the place was occupied and demonstrated its original use and much of its original detail. In 2023, the place is no longer habitable and original fabric has been stripped from the place and the remaining fabric is in poor condition.</p> <p>To make the place viable for use would require removal of the structures across the rear of the property and replacement of much of the remaining fabric in the front rooms of the place. These changes would have an impact on the cultural heritage significance.</p>
<p>Condition</p> <p><i>A structural condition report conducted by a registered structural engineer states that the structural integrity of the place has failed to the point where it cannot be rectified without the removal of a majority of its significant fabric. Note: The poor state of a place should not in itself be a reason for removal from MHI.</i></p>	<p>A structural engineer’s report has not been prepared. The application does not seek to demolish the building based on its current structural condition.</p> <p>The subject lot was originally acquired by the State for the purpose of delivering major road upgrades along Guildford Road and East Parade. Other properties acquired for the same purpose have previously been demolished in preparation for the future upgrades. The subject dwelling has been retained as far as practicable in the interim to allow for the final land requirements to be determined in order to understand the impact to the dwelling and the potential for retention.</p>

Social or Historic Significance only

Where the heritage value is historic and/or social only the owner/applicant can demonstrate that it cannot practically be retained in its entirety or in part because:

- a) The location of the building on the site; or*
- b) The limited Vehicular Access to the site and non-compliance with Australian Standards; or*
- c) The inability to comply with the National Construction Codes Series e.g. ramps, corridor widths etc.; or*
- d) The inability of the existing building structure or materials to be incorporated into the new development; or*
- e) The inability of the existing building to support additional height and bulk to the intention of the locality as prescribed in the relevant planning policy.*

The primary planning justification for proposing the removal of the dwelling from the MHI and supporting its demolition fall within sub-clauses (a) and (d).

(a) The location of the building on the site

Main Roads have progressed development of plans for major road upgrades at the Guildford Road / East Parade intersection and now have an endorsed land requirement plan which confirms the extent of additional road widening necessary to facilitate the upgrades. The plan confirms that the road widening will materially impact on the fabric of the dwelling. As outlined in Figures 2 and 3 and Attachments 2 and 4, the existing dwelling is incompatible with the future MRS PRR reservation as it will encroach into the road reserve.

The existing dwelling will require partial demolition and significant modification affecting the primary frontage including the front room, steps, verandah and associated footings to in order to eliminate encroachment into the future road reserve and attempt to retain remaining portions of the dwelling. The brick and metal roof dwelling cannot be relocated to account for the road widening.

Hocking Heritage + Architecture considered that the identified historic value of the dwellings role in demonstrating the creation of a neighbourhood clustered around Guildford Road is no longer evident because of existing changes to the original streetscape character. The ultimate changes to the street layout and the proximity of the dwelling to the street edge will fundamentally alter the context and relationship of the dwelling to the streetscape, further diminishing its authenticity, original character and historic value.

Hocking Heritage + Architecture conclude that due to the extent of required modifications, the historical fabric and character of the dwelling will be impacted to a point where it is not considered that the dwelling could be sustained and retain its heritage values.

The planned road widening and major upgrades of the East Parade / Guildford Road intersection is an important piece of transport infrastructure as identified in the Perth and Peel@3.5million Central Sub-Regional Framework. Subsequently, the existing dwelling will need to be demolished and removed.

(d) The inability of the existing building structure or materials to be incorporated into the new development.

The existing dwelling cannot be incorporated into the proposed Mount Lawley HDP development mainly due to its location and incompatibility with the existing and proposed MRS PRR reservation. The location of the dwelling in proximity to the existing MRS PRR reservation is non-compliant with the R100 primary street setback requirement of 2.0m. The proposed MRS PRR reservation falls within front portions of the dwelling itself.

The removal of the dwelling will allow for a comprehensive redevelopment of the wider development site for the delivery of new housing supply through an active State Government initiative in line with priority State Government policy objectives.

There may be opportunity as part of the demolition of the dwelling to recycle materials for use in future developments.

As demonstrated above, the existing dwelling cannot practically be sustained and retain its heritage values. We respectfully request that Council approve the proposed demolition and remove the property from the City's MHI.

Heritage Impact Statement

A Heritage Impact Statement ('HIS') and archival photographic record have been prepared by Hocking Heritage + Architecture (Hocking) in support of the proposed demolition of the dwelling.

Refer Attachment Five – Heritage Impact Statement.

The HIS notes that the decline in the condition of the building has meant a significant loss of aesthetic values. The evolution of Guildford Road to a busy main road has meant that any connection with the former community has long been absent. The HIS also assesses the impact that the additional road widening will have on the dwelling and concludes that:

'the demolition of the portion of the building will result in the loss of authenticity and integrity of the building. The remainder of the building could not be sustained and retain its heritage values.'

In summary, the incremental change to the function of Guildford Road and the associated streetscape including the properties adjoining the subject lot over time has resulted in a diminishing of the significance and character of the original streetscape and dwelling. The modifications that will be required as a result of additional road upgrades planned for Guildford Road will result in the authenticity of the character, style and physical fabric of the dwelling being reduced to a point where it no longer holds a practical value of retention.

As recommended in the HIS, Hocking have prepared a detailed archival photographic record which captures the remaining aesthetic heritage values evident at the place.

Refer Attachment Six – Archival Photographic Record

6.0 DEMOLITION METHODOLOGY

The demolition works will be completed in one stage and will include removal of all buildings and associated infrastructure.

At this juncture, a demolition contractor has not been appointed for the proposed works. Demolition methodology will be determined by the contractor, however, it is expected that the methodology will include:

- Service disconnections and rodent baiting;
- Site establishment and securing of the subject site;
- Removal of any hazardous materials (as required);
- Removal of ancillary structures, fittings, salvageable materials, deleterious materials etc;
- Vegetation removal and protection of trees to be retained;
- Further breakdown of demolished material or deconstructed structures; and
- Transport of demolished or deconstructed materials from the site.

Working hours for demolition are to be confirmed, but it is expected that works will be undertaken between the hours of 7am to 7pm Monday to Saturday (excluding public holidays), in accordance with the standard construction hours under the *Environmental Protection (Noise) Regulations 1997*. Any work outside these hours will require approval of an Out of Hours Noise Management Plan by the City.

It is expected that most vehicular movements associated with the demolition works will be via the laneway (removal of the rear fencing) and Stanley Street given Guildford Road is a busy regional road.

A more detailed Demolition Management Plan will be prepared by the appointed demolition contractor and will be submitted with the Demolition Permit application lodged with the City. This will include further details in relation to:

- Demolition methodology;
- Vegetation retention and protection;
- Noise and vibration management;
- Traffic management;
- Dust management;
- Safety and security; and
- Dilapidation surveys and reports.



8.2 X 8.2
TRUNCATION

STANLEY STREET

GUILDFORD ROAD

EAST PARADE

EAST PARADE

GARDINER STREET

PAKENHAM STREET

EBSWORTH STREET

AMENDMENT	DESCRIPTION	DATE	AUTHORISED	MICRO DATE

LEGEND

- LAND REQUIRED FOR ROAD PURPOSES
- BOUNDARY TO BE SURVEYED.

NOTES

- DIMENSIONS AND AREAS ARE APPROXIMATE ONLY AND ARE SUBJECT TO SURVEY.
- S.L.K. IS A M.R.W.A. STRAIGHT LINE KILOMETRE AND IS APPROXIMATE ONLY.
- CADASTRAL MODEL : CAD1123A
- HORIZONTAL DATUM IS MGA94.

PLANNING & TECHNICAL SERVICES

APPROVED FOR IMPLEMENTATION

FILE NUMBER	DATE	APPROVAL NUMBER

AUTHORISED	
APPROVED	

DRAWN/DESIGNED	W.M. ROLLINGS	DATE	17/8/23
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AUDITED IN ACCORDANCE WITH STANDARD 47-88-48 IN THE ROAD AND TRAFFIC ENGINEERING MANUAL.

GUILDFORD ROAD H026
LAND DEALINGS
0.9 - 1.5 SLK

LOCAL AUTHORITY	(130) CITY OF VINCENT
DRAWING TYPE	7200
DRAWING NUMBER	

FILE NUMBER	18/114.25	AMEND.	
			2360-203

ITEM	DESCRIPTION	C/T	OWNERSHIP	TOTAL AREA REQUIRED
1	LOT 202	1868/517	WAPC	158 m ²
2	LOT 203	1418/87	SPC	142 m ²
3	LOT 204	1887/420	WAPC	127 m ²
4	LOT 58	2720/303	METROPOLITAN WATER SUPPLY SEWERAGE & DRAINAGE BOARD	54 m ²
5	LOT 205	SP 4137	WAPC	225 m ²
6	LOT 88	SP 18967	CMR, WAPC	166 m ²
7	LOT 207	2178/84	CMR	173 m ²
8	LOT 208	1265/648	MRPA	180 m ²
9	LOT 209	1265/649	MRPA	187 m ²
10	LOT 233	SP 58926	WAPC, PRIVATE	243 m ²
11	LOT 234	1464/800	MRPA	194 m ²
12	LOT 235	1286/319	MRPA	194 m ²
13	LOT 236	1187/471	SPC	194 m ²
14	LOT 237	2208/548	WAPC	21 m ²
15	LOT 238	2208/546	WAPC	20 m ²
16	LOT 239	2208/549	WAPC	28 m ²
17	LOT 240	2208/550	WAPC	34 m ²
18	LOT 241	2208/551	WAPC	32 m ²
19	LOT 400	2208/540	WAPC	21 m ²
20	LOT 401	2208/541	WAPC	26 m ²
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22	LOT 244	2209/505	WAPC	42 m ²
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31	LOT 252	2209/506	WAPC	41 m ²
32	LOT 402	2209/506	WAPC	10 m ²
33	LOT 403	2209/507	WAPC	25 m ²
34	LOT 254	2209/507	WAPC	8 m ²
35	LOT 255	1701/915	SPC	42 m ²
36	LOT 256	2009/635	SPC	6 m ²
37	LOT 12	SP 8042	WAPC	76 m ²
38	LOT 50	1609/685	WAPC	2493 m ²

SCALE 1:500
SCM DATE A1

Plan Information

Tenure Type	Freehold
Plan Type	Deposited Plan
Plan Purpose	Subdivision

Plan Heading

Lots 501-504 & 801-805

Locality & Local Government

Locality	Mount Lawley
Local Government	City of Vincent

Department of Planning, Lands and Heritage

File Number

Examination

Examined _____ Date _____

Planning Approval

Planning Authority XXXXX

Reference

Delegated under S. 16 P&D Act 2005 _____ Date _____

In Order For Dealings

Subject To

For Inspector of Plans and Surveys _____ Date _____

Plan Approved

Inspector of Plans and Surveys / Authorised Land Officer _____ Date _____

Former Tenure Interests and Notifications

Subject	Purpose	Statutory Reference	Origin	Land Burdened	Benefit To	Comments
⑥	EASEMENT (SEWERAGE)	SEC 27A OF THE T.P & D ACT REGULATION 6	D 75898	LOT 503	WATER CORPORATION	SEE NOTE

Survey Details

Field Records	
Declared as Special Survey Area	NO

Survey Certificate - Regulation 54

I, NICHOLAS KAITSE hereby certify that this plan is accurate and is correct representation of the -
 (a) survey; and
 (b) calculations from measurements recorded in the field records,
 undertaken for the purposes of this plan and that it complies with the relevant written law(s) in relation to which it is lodged.

Licensed Surveyor _____ Date _____

Survey and Plan Notation

NOTE Z: THE DIMENSIONS AND POSITIONS OF THIS EASEMENT ARE BASED ON ACCURATE SURVEYED ALIGNMENTS.

Survey Organisation

Name	Land Surveys
Address	P.O BOX 746, Belmont 6984
Phone	94774477
Fax	94774499
Email	projects@landsurveys.net.au
Reference	2300903

Amendments

Version	Lodgement Type	Amendment Description	Authorised By	Date

Former Tenure

New Lot / Land	Parent Plan Number	Parent Lot Number	Title Reference	Subject Land Description		
501	P 2001	Pt 247	2208 / 552			
	P 2001	Pt 248	2208 / 543			
	P 2001	Pt 249	2209 / 504			
	P 2001	Pt 250	2208 / 544			
	P 2001	Pt 251	2209 / 508			
	P 2001	Pt 252	2209 / 506			
	DP 31182	Pt 402	2209 / 506			
	DP 31182	Pt 403	2209 / 507			
	P 2001	Pt 254	2209 / 507			
	P 2001	Pt 255	1701 / 915			
	P 2001	Pt 256	2009 / 635			
	DP 426938	Pt 552				
	502	P 2001	Pt 234		1464 / 800	
		P 2001	Pt 235		1286 / 319	
P 2001		Pt 236	1187 / 471			
P 2001		Pt 237	2208 / 548			
P 2001		Pt 238	2208 / 546			
P 2001		Pt 239	2208 / 549			
P 2001		Pt 240	2208 / 550			
P 2001		Pt 241	2208 / 551			
DP 31179		Pt 400	2208 / 540			
DP 31179		Pt 401	2208 / 541			
P 2001		Pt 243	2208 / 542			
P 2001		Pt 244	2209 / 505			
P 2001		Pt 245	2208 / 545			
P 2001		Pt 246	2208 / 547			
503	DP 426937	Pt 550				
	DP 426937	Pt 551				
	P 2001	Pt 207		2178 / 84		
	P 2001	Pt 208		1265 / 648		
	P 2001	Pt 209		1265 / 649		
504	P 2001	Pt 202	1868 / 517			
	P 2001	Pt 203	1418 / 87			
	P 2001	Pt 204	1887 / 420			
801	P 2001	Pt 255	1701 / 915			
	P 2001	Pt 256	2009 / 635			
	DP 426938	Pt 552				
802	P 2001	Pt 247	2208 / 552			
	P 2001	Pt 248	2208 / 543			
	P 2001	Pt 249	2209 / 504			
	P 2001	Pt 250	2208 / 544			
	P 2001	Pt 251	2209 / 508			
	P 2001	Pt 252	2209 / 506			
	DP 31182	Pt 402	2209 / 506			
	DP 31182	Pt 403	2209 / 507			
	P 2001	Pt 254	2209 / 507			
	803	P 2001	Pt 234		1464 / 800	
		P 2001	Pt 235		1286 / 319	
		P 2001	Pt 236		1187 / 471	
		P 2001	Pt 237		2208 / 548	
		P 2001	Pt 238		2208 / 546	
P 2001		Pt 239	2208 / 549			
P 2001		Pt 240	2208 / 550			
P 2001		Pt 241	2208 / 551			
DP 31179		Pt 400	2208 / 540			
DP 31179		Pt 401	2208 / 541			
P 2001		Pt 243	2208 / 542			
P 2001		Pt 244	2209 / 505			
P 2001		Pt 245	2208 / 545			
P 2001		Pt 246	2208 / 547			
804	DP 426937	Pt 550				
	DP 426937	Pt 551				
	P 2001	Pt 207		2178 / 84		
	P 2001	Pt 208		1265 / 648		
	P 2001	Pt 209		1265 / 649		
805	P 2001	Pt 202	1868 / 517			
	P 2001	Pt 203	1418 / 87			
	P 2001	Pt 204	1887 / 420			

UNLOGGED VERSION SUBJECT TO LANDGATE AUDIT & WAPC APPROVAL
 This plan is
 -Current as at REVISION A
 -Subject to change without notice
 -Not intended for design use, a LANDGATE CERTIFIED CORRECT copy should be obtained for such purposes.

DRAFT ONLY

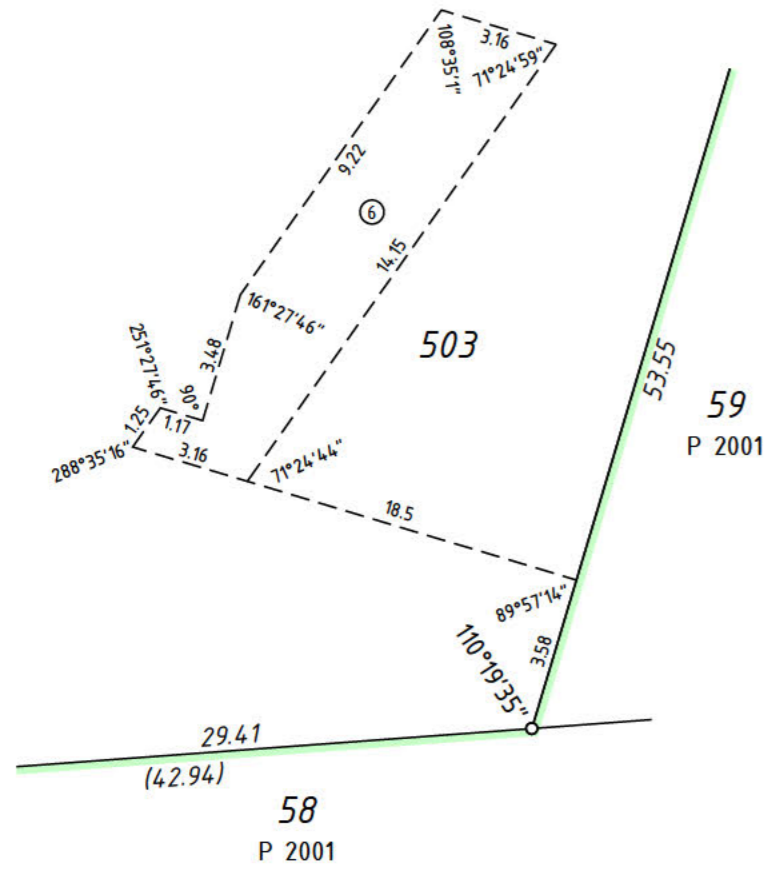


19 Brennan Way
 Belmont WA 6104
 PO Box 746 Belmont WA 6984
 T (08) 9477 4477 E projects@landsurveys.net.au CAD File: DP 426939.dwg
 F (08) 9477 4499 www.landsurveys.net.au JOB No: 2300903

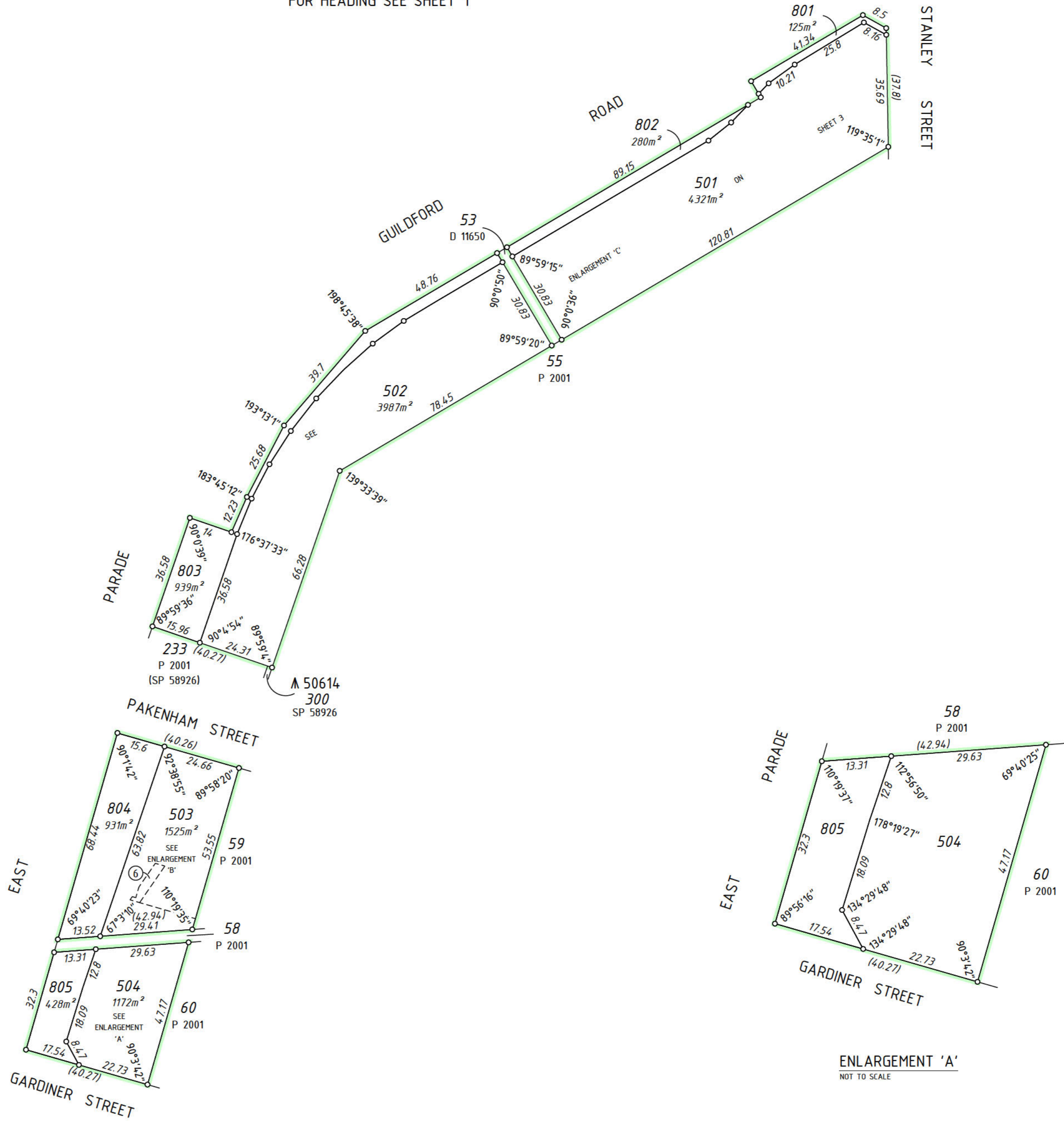
SHEET SHEETS VERSION NUMBER
1 OF 3 1

DEPOSITED PLAN
426939

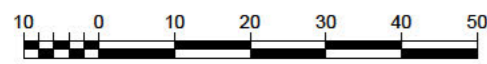
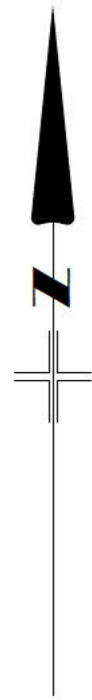
FOR HEADING SEE SHEET 1



ENLARGEMENT 'B'
NOT TO SCALE



ENLARGEMENT 'A'
NOT TO SCALE



1:1000 @ A2

ALL DISTANCES ARE IN METRES

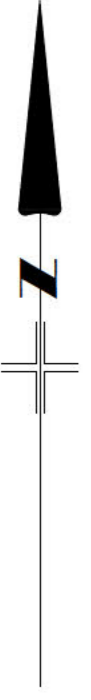
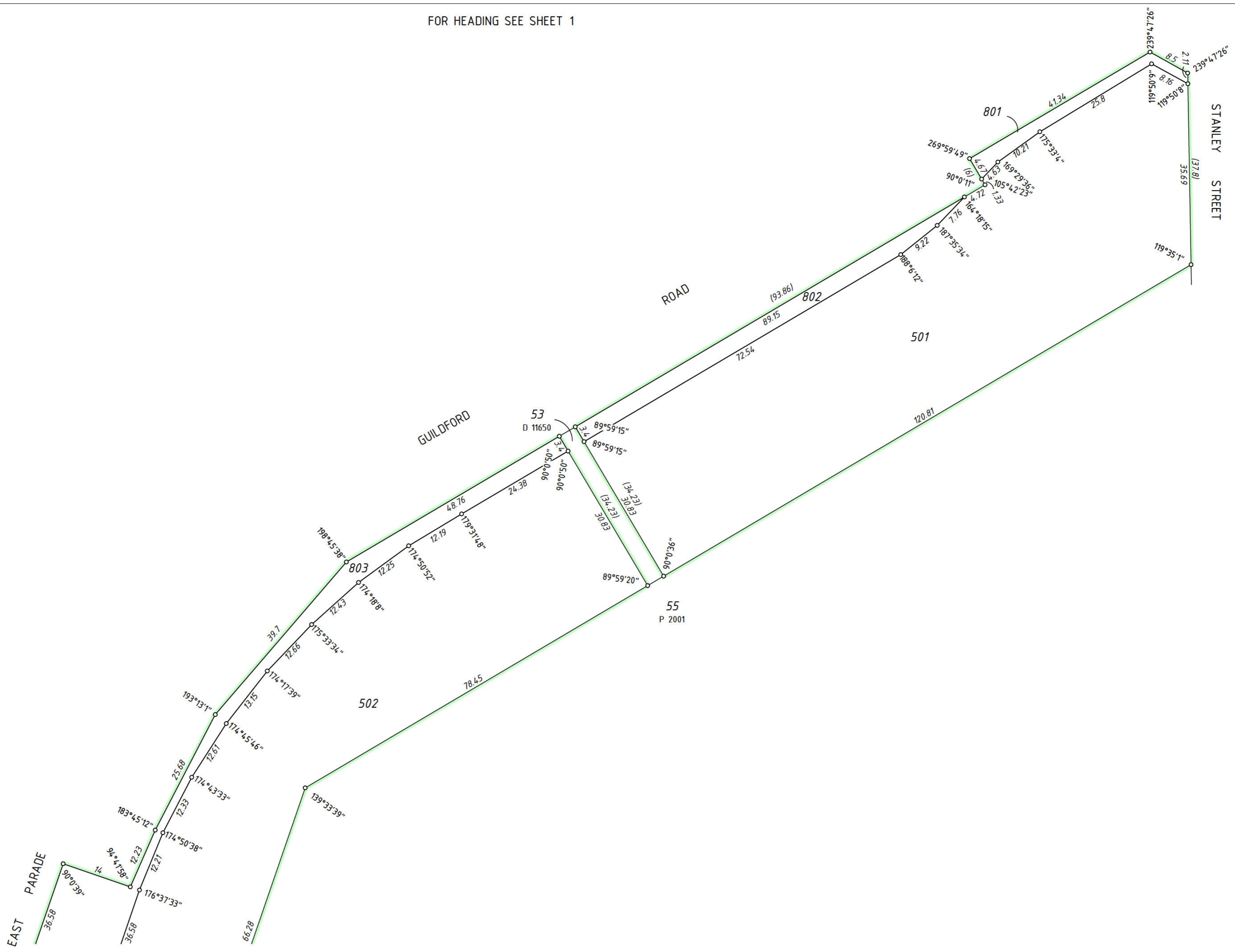


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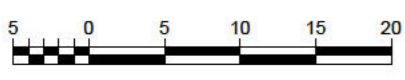
SHEET	SHEETS	VERSION NUMBER
2	OF 3	1

DEPOSITED PLAN
426939

FOR HEADING SEE SHEET 1



ENLARGEMENT 'C'



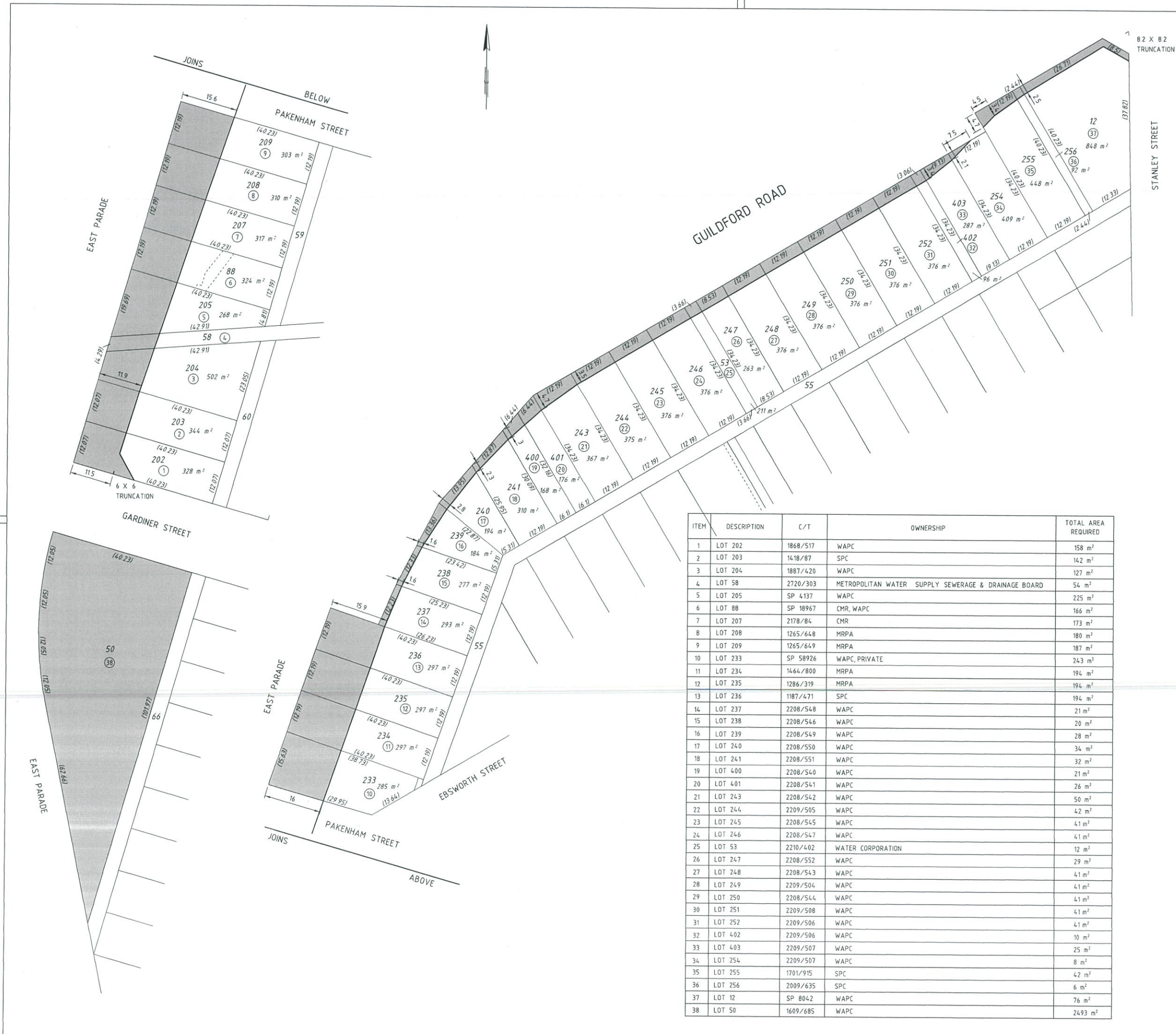
1:500 @ A2

ALL DISTANCES ARE IN METRES



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 Belmont WA 6104
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SHEET	SHEETS	VERSION NUMBER	DEPOSITED PLAN
3	OF 3	1	426939



8.2 X 8.2 TRUNCATION

STANLEY STREET

ITEM	DESCRIPTION	C/T	OWNERSHIP	TOTAL AREA REQUIRED
1	LOT 202	1868/517	WAPC	158 m ²
2	LOT 203	1418/87	SPC	142 m ²
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36	LOT 256	2009/635	SPC	6 m ²
37	LOT 12	SP 8042	WAPC	76 m ²
38	LOT 50	1609/685	WAPC	2493 m ²

AMENDMENTS

NO	DESCRIPTION	AUTHORISED	DATE	MICRODATE

LEGEND

- LAND REQUIRED FOR ROAD PURPOSES
- BOUNDARY TO BE SURVEYED

NOTES

- DIMENSIONS AND AREAS ARE APPROXIMATE ONLY AND ARE SUBJECT TO SURVEY.
- SLK IS A MRWA STRAIGHT LINE KILOMETRE AND IS APPROXIMATE ONLY
- CADASTRAL MODEL CAD1123A
- HORIZONTAL DATUM IS MGA94.

PLANNING & TECHNICAL SERVICES

APPROVED FOR IMPLEMENTATION
 FILE NUMBER 22/7309 DATE 5/09/2023 APPROVAL NUMBER
 AUTHORIZED
 APPROVED

mainroads
WESTERN AUSTRALIA
FINANCE & CORPORATE SERVICES
TRANSPORT PORTFOLIO LAND & PROPERTY SERVICES
Telephone 9323 4500

DRAWN/DESIGNED W.M. ROLLINGS DATE 17/8/23
 AUDITED IN ACCORDANCE WITH STANDARD S7-88-48 IN THE ROAD AND TRAFFIC ENGINEERING MANUAL

**GUILDFORD ROAD H026
LAND DEALINGS
0.9 - 15 SLK**

LOCAL AUTHORITY (130) CITY OF VINCENT	DRAWING TYPE 7200	DRAWING NUMBER	AMEND.
FILE NUMBER 18/11425	2360-203		

SCALE 1:500
 SCAN DATE
 A
 1



Department of Planning,
Lands and Heritage



P3138, LOT 254 (40) GUILDFORD RD, MOUNT LAWLEY
Heritage Impact Statement



HOCKING HERITAGE + ARCHITECTURE

August 2023

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HHA Job No. 2023-08

Rev No	Author	Reviewer	Date
-	Prue Griffin	Grady O'Brien, DPLH Nick Bertone, City of Vincent	March 2023
A	Prue Griffin	Blake Rawlinson	August 2023
B	Prue Griffin		

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1. Introduction

This Heritage Impact Statement has been prepared at the request of the Department of Planning Lands and Heritage. Demolition of the building is proposed to enable future development of this site and adjacent properties on Guildford Road and East Parade, Mount Lawley for social housing.

Alongside the proposed development of the large parcel of land owned by the DPLH, Main Roads WA have assessed that Guildford Road needs to be widened along the southern side of Guildford Road to accommodate increased volume of vehicle traffic. The volume of traffic is also predicted to increase with any proposed development of the land held by DPLH. The widening will require resumption of portion of all lots on the south side of Guildford Road between Stanley Street and Pakenham Street.

The proposed resumption for road widening will require portion of the subject property at 40 Guildford Road to be removed.

40 Guildford Road was considered by the Department of Planning Lands and Heritage for inclusion in the State Register of Heritage Places in 2002 and was found to be below threshold for inclusion.

This heritage impact statement seeks to assess the impact on the cultural heritage significance of the place and some consideration of the wider impact on the streetscape. The report has been prepared following the guidelines established by the Heritage Council in their publication *Heritage Impact Statement – A Guide*.

2. Site Analysis

2.1 Location

The property is located on the southeast side of Guildford Road in the block bound by Stanley Street and East Parade.

The property is located across two lots; lot 254 (40) on Plan 2001 and lot 403 on Deposited Plan 31182 as designated on Certificate of Title Volume 2209 Folio 50.

On either side of the lot are vacant lots where former residences of a similar age were located.

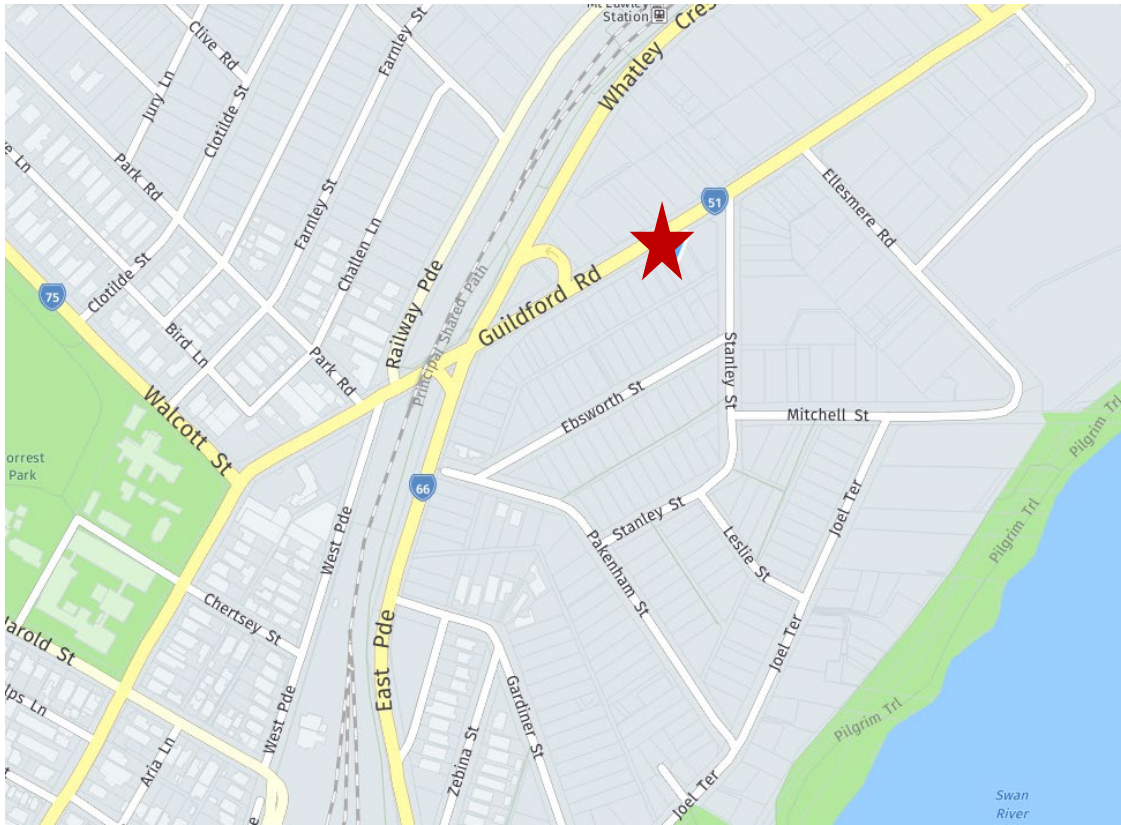


Figure 1: Location Map
Courtesy Google Maps, accessed 21 October 2022



Figure 2: Lots 254 and 403 (40) Guildford Road Mount Lawley.
COURTESY CITY OF VINCENT INTRAMAPS

2.2 Heritage Listing

The place has been identified by the City of Vincent as a Moderate Level of Significance which is described as:

Contributes to the heritage of the locality. Has some altered or modified elements, not necessarily detracting from the overall significance of the place.

Management Category B - Conservation Recommended

Consider for inclusion on the MHI (Heritage List) if owner/applicant consents to inclusion.

Type	Status	Date	Category
Local Heritage Survey		12 Sept 2006	Category B
Heritage List	Adopted	12 Sept 2006	
Heritage Agreement	None		
State Register	Below Threshold	30 Nov 2001	-----
Register of National Estate	-----	-----	-----
Classified by the National Trust	-----	-----	-----

2.3 Statement of Significance

The City of Vincent prepared the following statement in 2006.

The house at 40 Guildford Road is a substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity.

3. Subject Property

3.1 Physical Description

This substantial single storey brick and corrugated zincalume residence demonstrates the Federation Queen Anne style. It is an asymmetric floor plan with a verandah wrapping the front and portion of the western side of the building.

It features an elaborate gable infill on the projecting bay and a bullnose verandah roof supported on turned posts. The verandah is brick paving on sand infill that is contained by limestone foundations. The original timber verandah has been removed although the steps to the main entry do remain.

Internally the place retains its original floor plan with some additions across the rear. In general, there is little evidence of any original finishes as the place has been stripped of all architectural details, such as architraves, skirtings and the majority of the floorboards. Windows are all broken and some window frames have been completely removed. On the eastern elevation there is evidence of failed brickwork.

The place is in very poor condition and graffiti is evident internally and externally.

The garden shows no evidence of any formal planting and although some trees are large specimens there are not species of any particular rarity or merit.

3.2 Streetscape



Figure 3: View southwest on Guildford Road and vacant lot adjacent.



Figure 4: View southwest on Guildford Road towards the Mount Lawley subway.



Figure 5: View northeast on Guildford Road towards subject property.



Figure 6: View of the western elevation across the adjacent vacant lots.



Figure 7: View showing relationship to Guildford Road.



Figure 8: View showing relationship to Guildford Road.

3.3 Elevations and Landscape

The majority of the exterior of the original residence still demonstrates the brick construction with concrete bands and some remnants of tuckpointing. Large areas of the external walls have graffiti and the surrounding grounds are in poor condition with some mature trees.



Figure 9: Front Elevation



Figure 10: Front Elevation



Figure 11: Front Elevation



Figure 12: Front Elevation



Figure 13: Rear Elevation.



Figure 14: Rear Elevation.



Figure 15: West Elevation.



Figure 16: East Elevation.

3.4 Internal Photographs

The interior of the property was poorly lit and difficult to navigate because of the removed floorboards and accumulation of debris. The following photographs demonstrate that the majority of detail has been removed. Apart from some original floorboards there are no architraves, skirtings or doors. There is also asbestos sheeting in the rear of the building.



Figure 17: Front Door.



Figure 18: Hallway.



Figure 19: Bedroom



Figure 20: Bedroom.



Figure 21: Bedroom



Figure 22: Bedroom 1.



Figure 23: Bedroom 2.

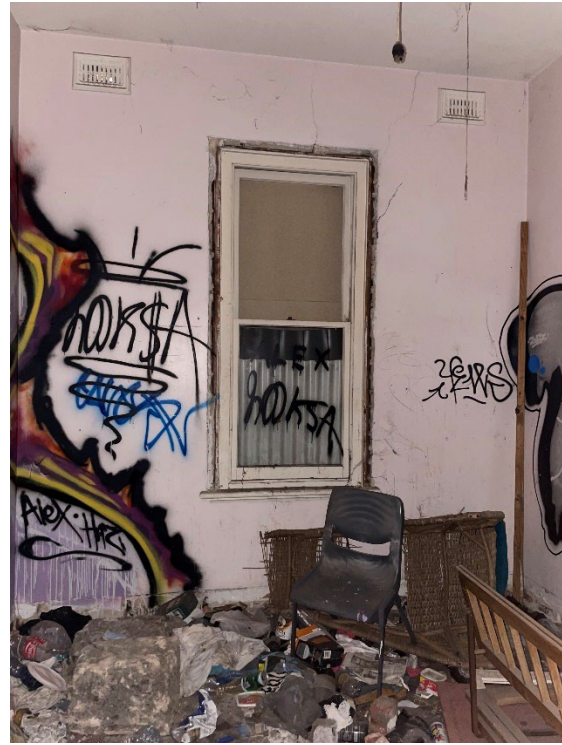


Figure 24: Bedroom 3.



Figure 25: Lounge Room.



Figure 26: Lounge Room.



Figure 27: Lounge Room



Figure 28: Lounge Room



Figure 29: Dining Room (former kitchen)

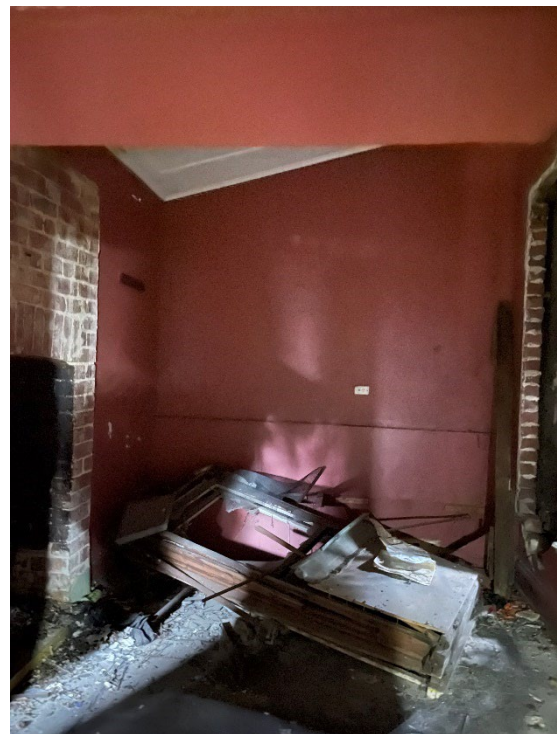


Figure 30: Dining Room (former kitchen)



Figure 31: Kitchen.



Figure 32: Kitchen ceiling.



Figure 33: Kitchen alcove.



Figure 34: Kitchen.

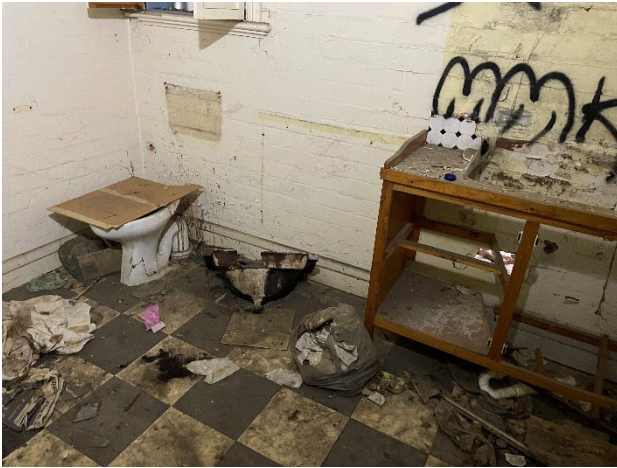


Figure 35: Bathroom.

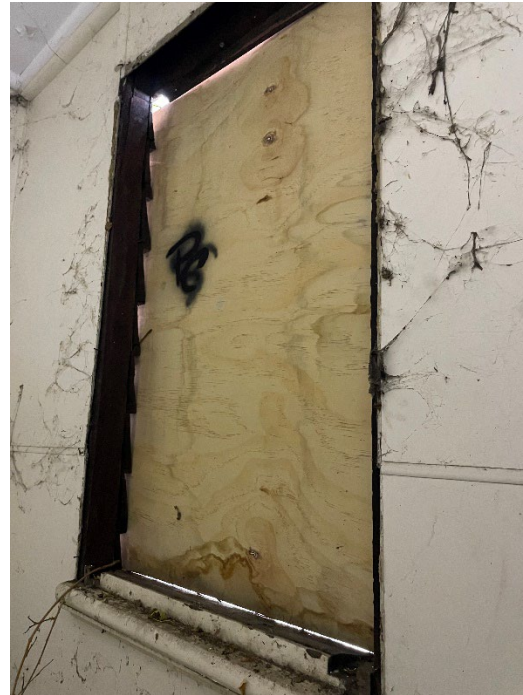


Figure 36: Bathroom window.

3.5 History

This place was built c1904 as a private residence. It was used for that purpose until its declining condition made it uneconomic to repair. The place was closed and has been accessed by vagrants for some years and been stripped of any original detail.¹

The adjacent residences on Guildford Road have been demolished in the early 2000s leaving the place isolated within cleared lots to the north and south.

4. Proposed Development

The Department of Planning Lands and Heritage are proposing to develop this site and adjoining lots for future social housing. The form and scale of the development has not been finalised at this stage. Nevertheless, it is a requirement of the new development that the site is cleared to enable optimum occupancy of the site.

Alongside the proposed development of the large parcel of land owned by the DPLH, Main Roads WA have assessed that Guildford Road needs to be widened along the southern side of Guildford Road to accommodate the current increased volume of vehicle traffic. The volume of traffic is also predicted to increase with any proposed development of the land held by DPLH. The widening will require resumption of portion of all lots on the south side of Guildford Road between Stanley Street and Pakenham Street.

Specifically, the proposed resumption for road widening will require portion of the subject property at 40 Guildford Road to be removed.

Therefore the subject property is required to be removed for future development of the site and because it will hamper the road widening which is required for the ongoing safety and amenity of the community.

¹ Refer to the Archival Record for 40 Guildford Road, Mount Lawley, May 2023.

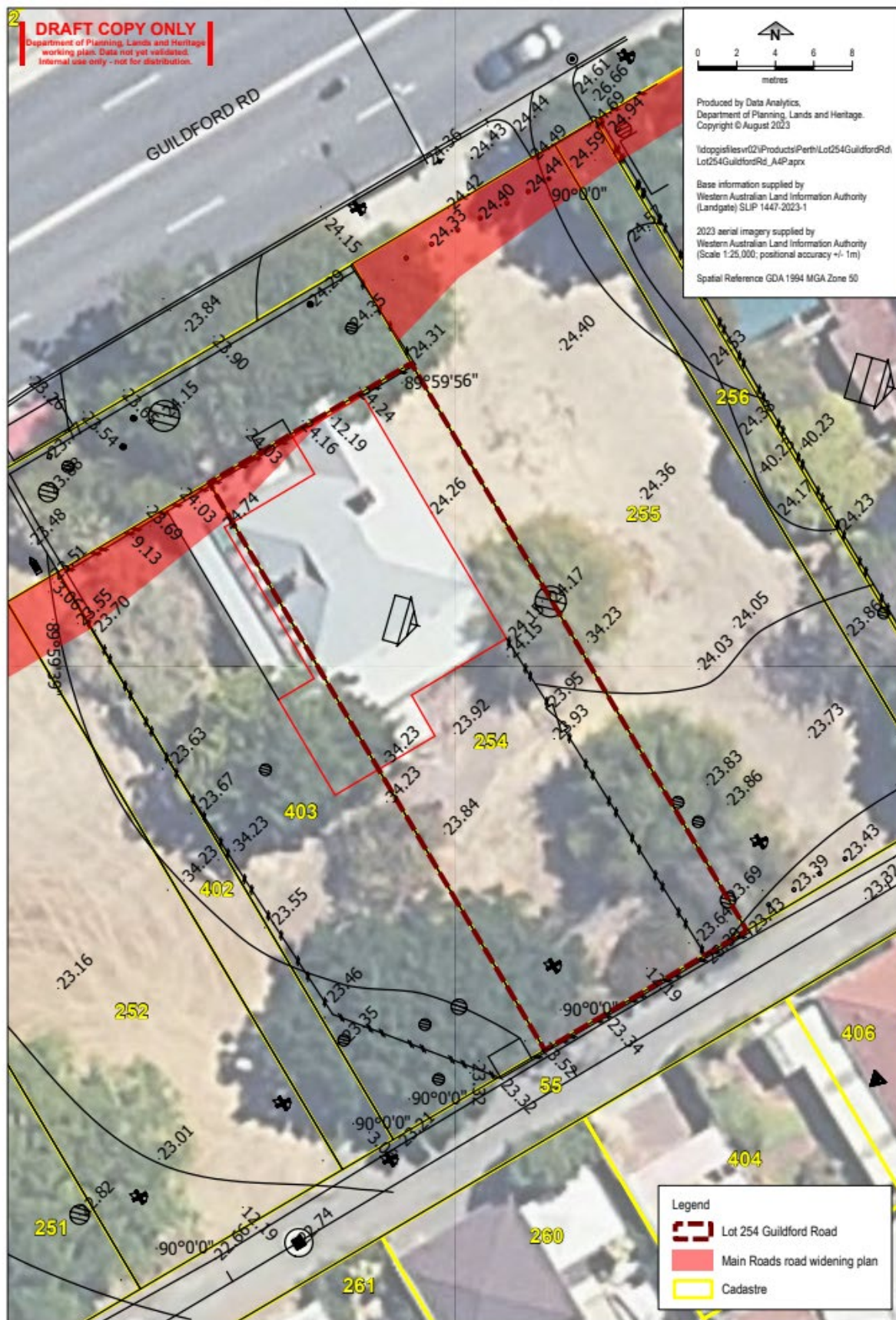


Figure 37: Road Widening Plan prepared by Main Roads.

5. Assessment of Impact

The development application is seeking to remove the building from the City's Municipal Heritage Inventory (MHI) to enable demolition of the building.

Under Clause 2 of the City of Vincent's Heritage Policy 7.6.5, amendments can be made to the MHI to accompany applications for demolition.

The requirements under Figure 1 of that policy state that to delete a building from the MHI, the application would be to demonstrate **one** of the following

- *The cultural heritage significance of the place in the existing heritage assessment was erroneous.*
- *A structural condition report conducted by a registered structural engineers states that the structural integrity of the place has failed to the point where it cannot be rectified without the removal of a majority of its significant fabric. Note: The poor state of a place should not in itself be a reason for removal from MHI*
- *Where the heritage value is historic and/or social only the owner/applicant can demonstrate that it cannot practically be retained in its entirety or in part*

RATIONALE FOR REMOVAL FROM THE MHI	RATIONALE
<p><i>The cultural heritage significance of the place in the existing heritage assessment was erroneous.</i></p>	<p>The cultural heritage significance of the place was not erroneous in 2007 when last assessed.</p> <p>It was noted at that time that the integrity of the historic setting had been compromised. Since then, the increased traffic on Guildford Road has led to an acceleration in the changes to the streetscape and its original neighbourhood context.</p> <p>In 2007, the place was occupied and demonstrated its original use and much of its original detail. In 2023, the place is no longer habitable and original fabric has been stripped from the place and the remaining fabric is in poor condition.</p> <p>To make the place viable for use would require removal of the structures across the rear of the property and replacement of much of the remaining fabric in the front rooms of the place. These changes would have an impact on the cultural heritage significance.</p>
<p><i>A structural condition report conducted by a registered structural engineers states that the structural integrity of the place has failed to the point where it cannot be rectified without the removal of a majority of its significant fabric. Note: The poor state of a place should not in itself be a reason for removal from MHI</i></p>	<p>A structural engineer's report has not been prepared.</p>
<p><i>Where the heritage value is historic and/or social only the owner/applicant can demonstrate that it cannot practically be retained in its entirety or in part</i></p>	<p>The heritage values of the place were determined to be in part the aesthetic value of its Federation Arts and Crafts style which is no</p>

	<p>longer apparent because of the loss of original detail.</p> <p>The historic and social values of the place were identified in the remaining form and fabric of the place. This has now been significantly diminished through vandalism and the deterioration of the condition of the remaining fabric.</p> <p>The identified historic value of its role in demonstrating the creation of a neighbourhood clustered around Guildford Road is no longer evident.</p>
--	---

In addition to the above requirements of the Heritage Policy 7.6.5 an assessment of the impact of demolition on the heritage values of the place has been determined through the values designated in the 2006 Heritage Assessment for the Local Heritage Survey.

The house at 40 Guildford Road is a substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity.

The decline in the condition of the building has meant a significant loss of aesthetic values and the evolution of Guildford Road to a busy main road has meant that any connection with the former community has long been absent.

HERITAGE VALUE	ASSESSMENT OF IMPACT
<p><i>The house at 40 Guildford Road is a substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity</i></p>	<p><i>The demolition of the building will lead to a loss of the building fabric but its degraded state has meant its heritage values are already diminished from the 2006 statement.</i></p> <p><i>The association with the original development has long been absent because of the changing nature of the adjacent properties on Guildford Road.</i></p> <p><i>The future road widening of Guildford Road will have a further impact on the heritage value associated with the former streetscape and community which formerly lived adjacent.</i></p>

6. Conclusion

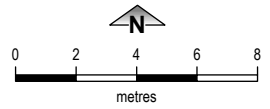
The demolition of the building at 40 Guildford Road, Mount Lawley is supported.

The road widening is essential for the safety and amenity of the wider community. Demolition of portion of the building will result in the loss of authenticity and integrity of the building. The remainder of the building could not be sustained and retain its heritage values.

The preparation of an archival photographic record will capture any remaining aesthetic heritage values evident at the place.

ATTACHMENT FIVE – ROAD WIDENING REQUIREMENTS OVERLAY

2 **DRAFT COPY ONLY**
Department of Planning, Lands and Heritage
working plan. Data not yet validated.
Internal use only - not for distribution.



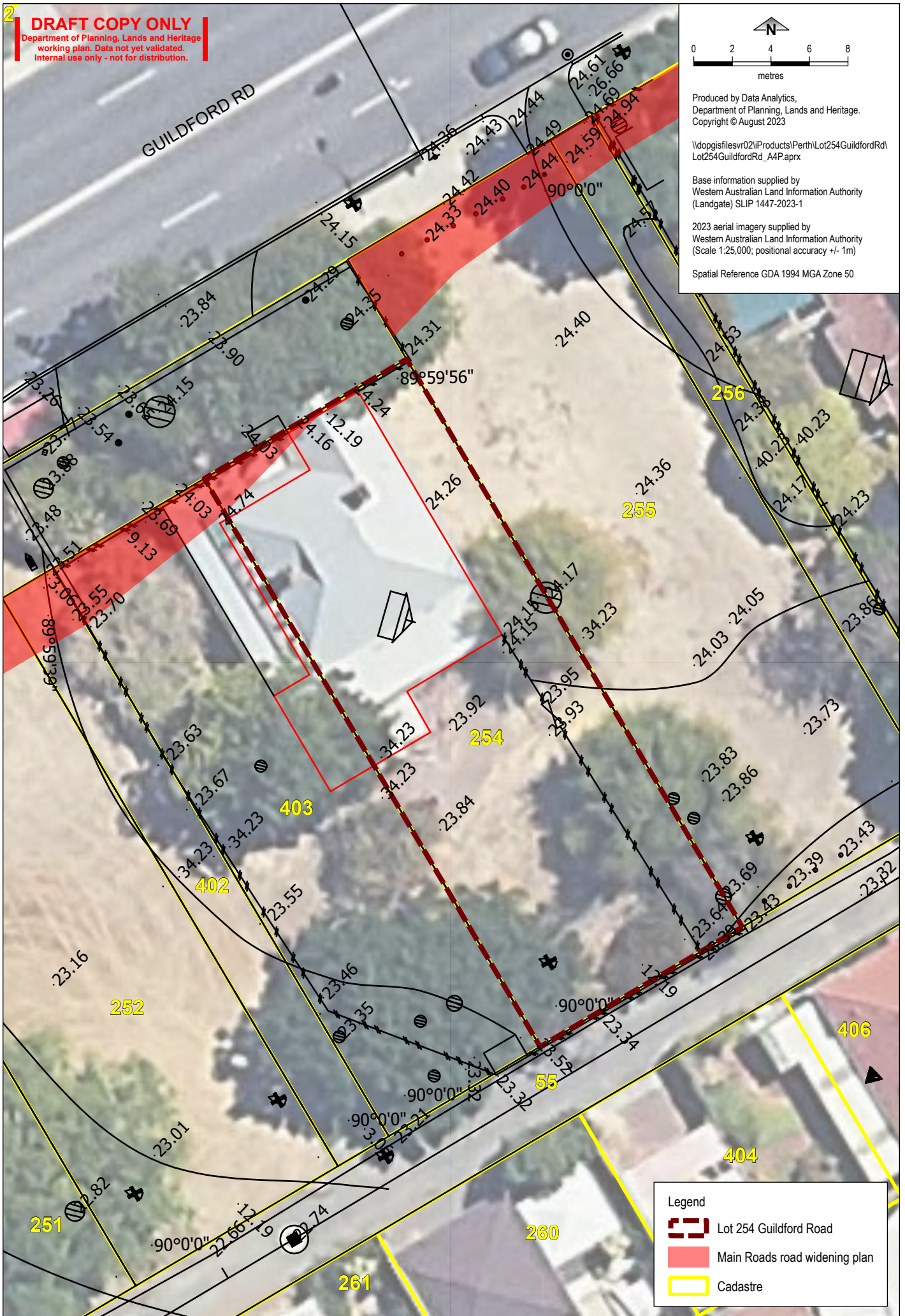
Produced by Data Analytics,
Department of Planning, Lands and Heritage.
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\\dogisfilesvr02\Products\Perth\Lot254GuildfordRd\Lot254GuildfordRd_A4P.aprx

Base information supplied by
Western Australian Land Information Authority
(Landgate) SLIP 1447-2023-1

2023 aerial imagery supplied by
Western Australian Land Information Authority
(Scale 1:25,000; positional accuracy +/- 1m)

Spatial Reference GDA 1994 MGA Zone 50



Legend

- Lot 254 Guildford Road
- Main Roads road widening plan
- Cadastre

Lot 254 Guildford Road, Mount Lawley

ATTACHMENT SIX - ARCHIVAL PHOTOGRAPHIC RECORD



Department of Planning,
Lands and Heritage



P3138, LOT 254 (40) GUILDFORD RD, MOUNT LAWLEY
Photographic Archival Record



HOCKING HERITAGE + ARCHITECTURE

March 2023

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HHS Job No. 2023-08

Rev No	Author	Reviewer		Date
-	Prue Griffin	Grady O'Brien	DPLH	March 2023



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1.0 Background

This photograph archival record has been prepared at the request of the Department of Planning Lands and Heritage. Demolition is proposed for the building to enable future development of this site and adjacent properties on Guildford Road and East Parade, Mount Lawley.

This place was considered by the Department of Planning Lands and Heritage for inclusion in the State Register of Heritage Places in 2002 and was found to be below threshold for inclusion.

The place has been identified by the City of Vincent as a Moderate Level of Significance which is described as:

Contributes to the heritage of the locality. Has some altered or modified elements, not necessarily detracting from the overall significance of the place.

Management Category B - Conservation Recommended

Consider for inclusion on the MHI (Heritage List) if owner/applicant consents to inclusion.

This Archival Record has been prepared to enable the development of the site whilst recognising the heritage values of the place.

2.0 Statement of Significance

The City of Vincent have prepared the following statement.

The house at 40 Guildford Road is a substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity.

3.0 Location

The property is located on the south east side of Guildford Road in the block bound by Stanley Street and East Parade.

The property is located across two lots; lot 254 (40) on Plan 2001 and lot 403 on Deposited Plan 31182 as designated on Certificate of Title Volume 2209 Folio 50.

On either side of the lot are vacant lots where former residences of a similar age were located.



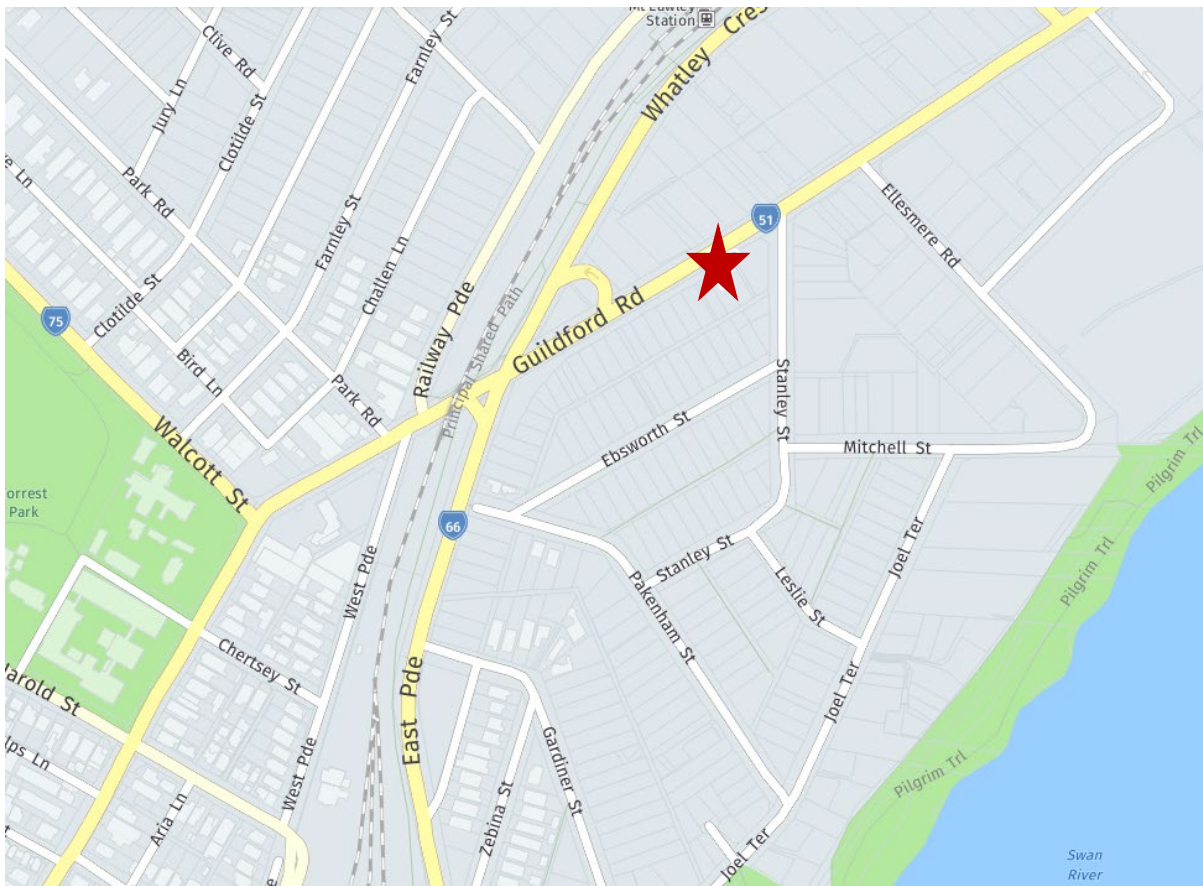


Figure 1: Location Plan

COURTESY NEARMAP



Figure 2: Lots 254 and 403 (40) Guildford Road Mount Lawley.

COURTESY CITY OF VINCENT INTRAMAPS



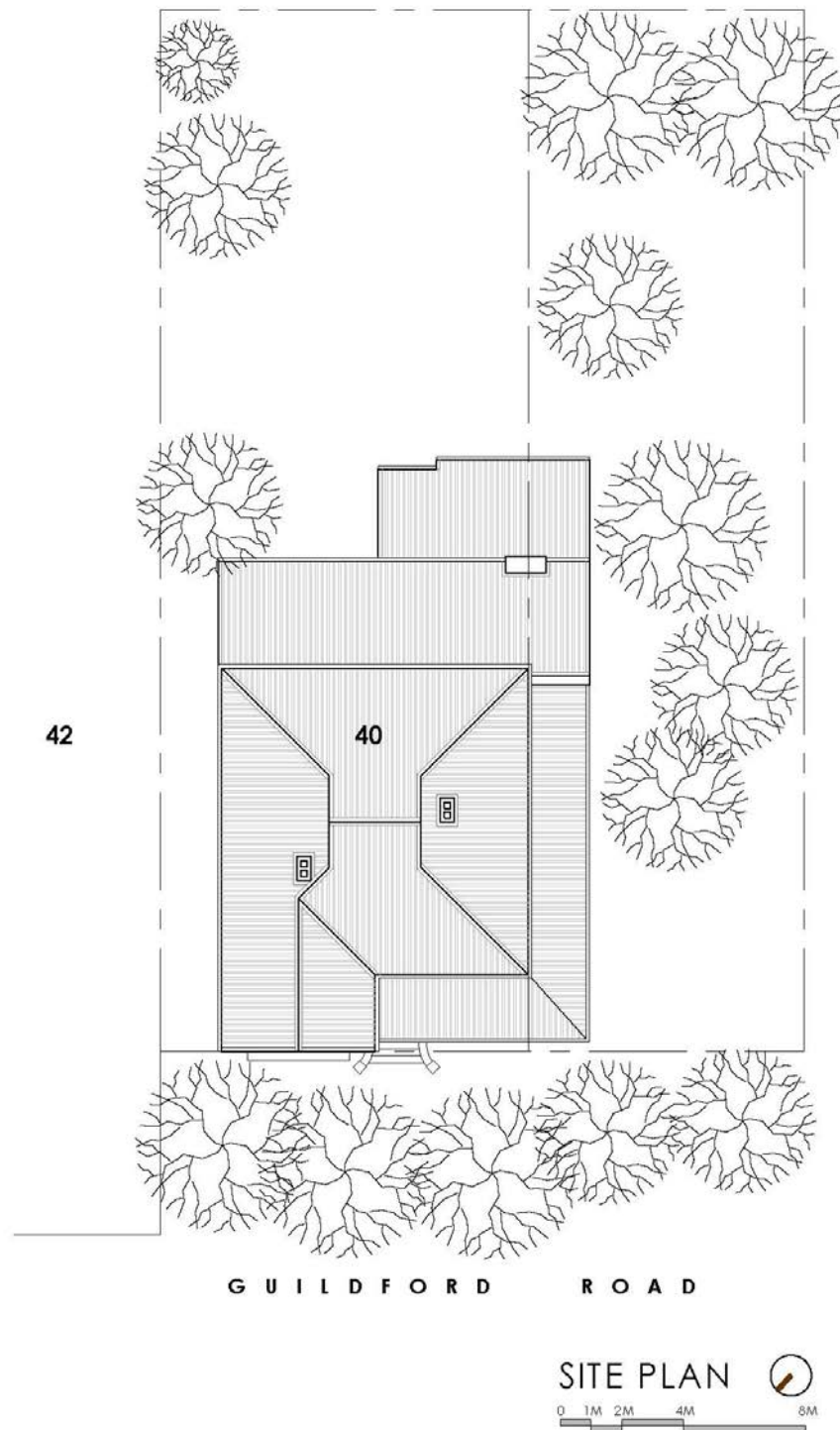


Figure 3: Site Plan



4.0 Brief History

*This history has been expanded from the research prepared for the City of Vincent Local Heritage Survey. Acknowledgement is extended to the authors of that documentation.*¹

This section of Guildford Road is part of the East Norwood Estate which was developed in 1898, on part of Locations A4 and A5, on the eastern side of the Fremantle-Guildford Railway line, in the East Perth/Mt Lawley area. The subdivision was carried out by surveyors Crossland & Hardy on behalf of the Perth (WA) Estate Company Limited of 364 Hay Street.

The strong demand for new housing was a result of the population boom created by the gold discoveries in the State. One member of the Perth (WA) Estate Company was Zebina Lane, who was an engineer and mine owner at the Great Boulder mines, and one of a number of people who made money in gold mining and reinvested it in land developments during this period. The Company had previously developed the adjoining Westralia Estate on the west side of the railway line on Location A4. The estate was promoted as having 'splendid building lots', 'made roads' and 'river frontages'. In the latter case these were the larger blocks along Joel Terrace which were expected to attract the wealthier buyers. It is evident from the subdivision map that this was not one of the earliest blocks sold, the earliest being those used for 'spec' and rental housing along the railway line (East Parade), Bramall and Summers Street.

The estate's boundary nearest to the subject place was Stanley Street (two house blocks from No. 40), which later became the boundary between the Town of Vincent (formed 1995) and that portion of Mount Lawley which is in the City of Stirling. This section of Guildford Road was listed in the Wise's Post Office Directories initially as 'Guildford old road' and by 1905 it was known as 'Old Guildford Road' and listed in conjunction with Lord Street. Around 1908 it became known as 'Guildford Road, Norwood' and it remained so until the 1940's.

No 40 Guildford Road, was well positioned for access to Perth's train system via the nearby Mount Lawley Station. Then in 1924 a single tram track was laid from the tram terminus on the corner of Lord and Lincoln Streets through the Mount Lawley Subway to Maylands. In 1939 this line was duplicated, and the Subway widened to accommodate the second track. This further improved access to the city.

In 1925 the resident was Herbert Illingworth. At that time the area around the Mount Lawley Subway (just a street block away) was a thriving village. The shops and businesses also listed in the Directories were No. 1 Guildford Road Methodist Church, No. 3 plumber, No. 5 Laundry, Nos. 8 - 10 butcher, No. 12 fancy goods and draper, No. 14 confectioner and grocer, No. 15 newsagent, stationer, tobacconist and State Savings Bank agency, No. 18 tobacco and fancy goods and No. 19 butcher. In 1.

The subdivision plan for this property was approved in 1898 and lots were purchased from the developer British Westralia Syndicate Limited.² Lots 253 and 254 were purchased in 1902 by Alice Victoria McColl.³

Alice Victoria McColl (c1863-1914) was the wife of railway employee, Stawell Austral McColl (c1861-1916). From the available evidence in the Post Office Directories and Electoral Rolls the place was built in 1904 as A. McColl is recorded living in Guildford Road in 1905. The builder or architect of the residence has not been determined. It is likely that a local builder, such as John Berne Hawkins who lived in Guildford Road, constructed the home in accordance with readily available plans from pattern books that were in common usage at the time. The plan form and remaining detail of the building indicate that the home was of some quality and not a cottage for occupants of limited

¹ Place 3818 House, City of Vincent InHerit database entry. Adopted 2006.

² Certificate of Title, 161/20, Landgate.

³ Certificate of Title, 161/20, Landgate.



income. This conclusion is also supported by the evidence that the residence occupied more than one lot it and was set in a more expansive garden setting.⁴

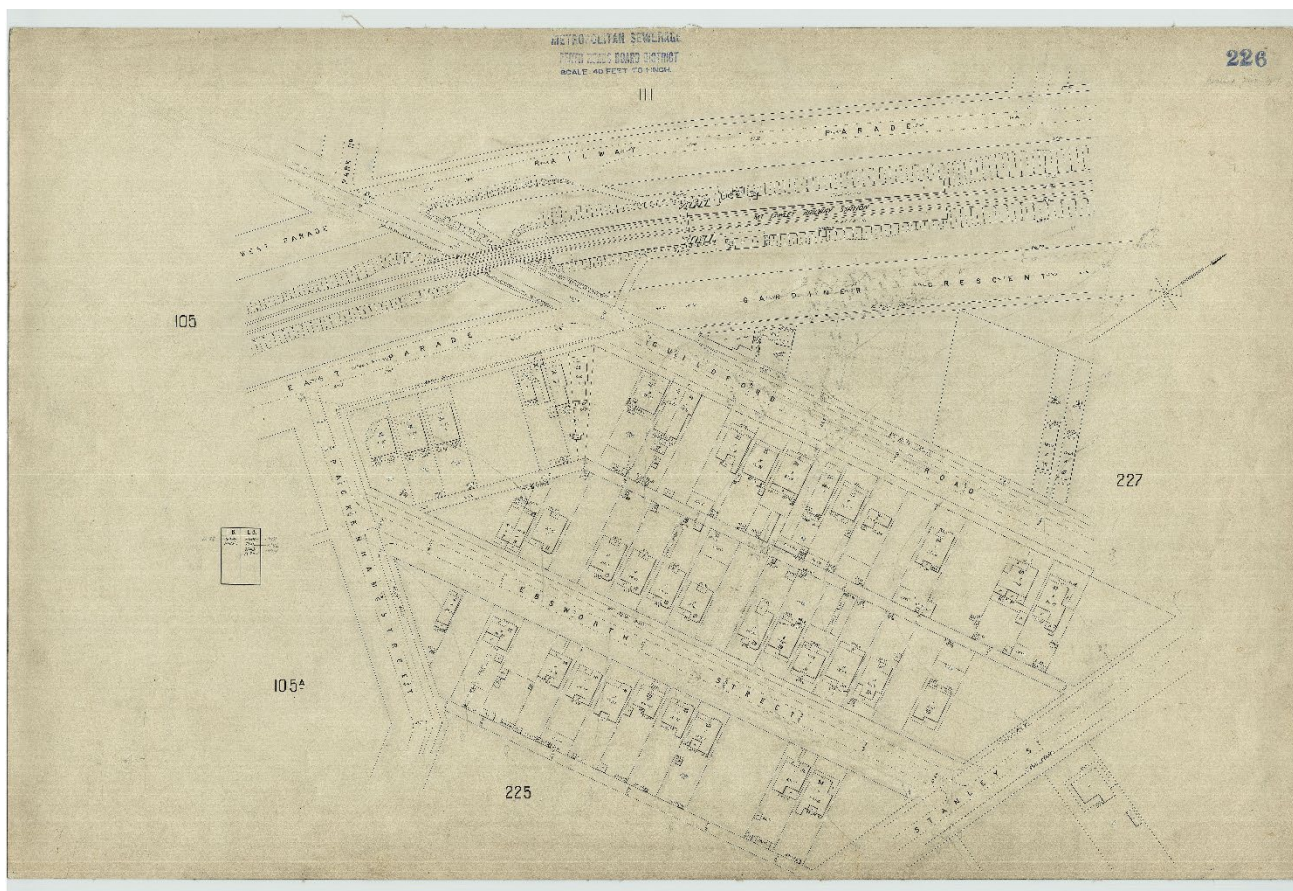


Figure 4: Sewerage Plan Sheet 226, 1917.

COURTESY SROWA SERIES 634 CONS 4156 ITEM 0226

The McColls appear to have lived in the place until c1911 and subsequently leased the place to tenants. A newspaper article from March 1911 records that Stawell and Alice McColl were living in St Georges Terrace Perth at that time.⁵

Post Office Directories record that there was a rapid turnover of occupants between 1912 and 1915 and was then occupied by caterer Andrew Cavanagh and his wife Jane until 1918.

In 1914, Alice McColl died, and the property transferred to Stawell McColl, and on his death in 1916 the property was transferred to their children, Alice Sophia McColl and Archibald Dougald McColl.⁶ The siblings continued to lease the property to tenants, traveller Herbert Illingworth and his wife Ethel Illingworth from 1919 to 1926.⁷

In 1926, the property was transferred to clerk Frederick William James Joyce (c1893-1973) and his wife Eunice Hilda Joyce, nee Bevan (c1895-1977). The couple married in 1914 and had at least four children and lived at this house until the 1970s. Frederick Joyce died in 1973 and Eunice lived on in the house until at least 1975 when the place was transferred to draftsman William Richard Marks and

⁴ Sewerage Plan Sheet 226 shows the width of the lot is larger than the majority of the housing lots adjacent.

⁵ *The West Australian*, 29 March 1911, p. 4.

⁶ Certificates of Title, 682/184 and 682/185, Landgate.

⁷ Post Office Directories, State Library of WA, [Post office directories | State Library of Western Australia \(slwa.wa.gov.au\)](https://www.slsa.wa.gov.au/post-office-directories) accessed February 2023.

Public Relations Officer Lynette Marks.⁸ The couple lived at the house until 1986 when the house was transferred to the Western Australian Planning Commission.⁹ With the transfer of the property to the WAPC the residence was leased to tenants.

Aerial photographs from the mid 20th century indicate that the extent and form of the residence have not changed considerably since that time. The WAPC and its subsequent authorities maintained the property when it was occupied by tenants including the replacement of the roof cladding in the late 1980s.

The physical evidence suggests that the timber verandah was replaced in the late 1980s with the current verandah which is brick laid on sand.

The houses located to the south of the 40 Guildford Road were demolished in 2000, and the house to the north was demolished c2009. The original residential context of this portion of Guildford Road has been lost as a result of these changes.

The residence has been unoccupied for several years and is in a very poor condition.

4.1 Occupants and owners

DATE	OWNERS	OCCUPANT
1898 - 1902	British Westralia Syndicate Limited	None
1902 - 1918	Alice Victoria McColl	1905 – 1911 Stawell Austral McColl and Alice Victoria McColl. 1912 William J Franz 1913 Frederick W Koeppe 1914 John Dillon and Haswell Bromley 1915 - 1918 Andrew and Jane Cavanagh
1918 - 1926	Alice Sophia McColl and Archibald Dougald McColl	1919 - 1926 Herbert Illingworth
1926 – 1975	Frederick William Joyce and Eunice Hilda Joyce.	Frederick William Joyce (until 1973) and Eunice Hilda Joyce.
1975 - 1986	William Richard Marks and Theresa Barbara Marks	William Richard Marks and Theresa Barbara Marks
1986 - 2001	Western Australian Planning Commission	Various
2001 – 2023	Western Australian Planning Commission (Dept of Planning Lands and Heritage)	Various and vacant

⁸ Certificate of Title 1033/111, Landgate.

⁹ Certificate of Title 1070/301, Landgate.

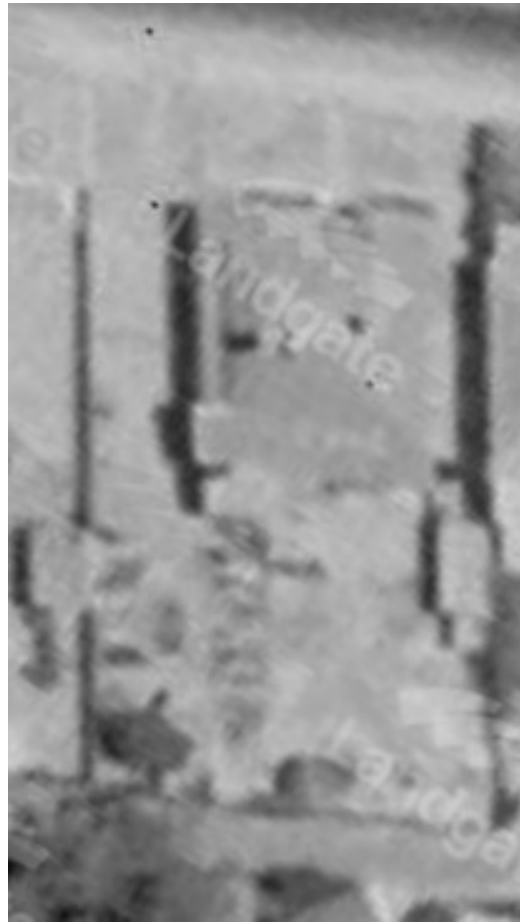
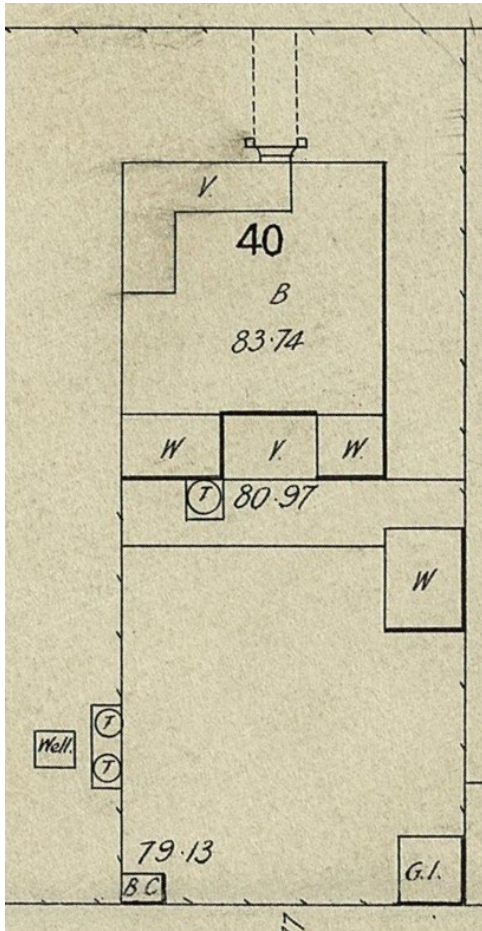


Figure 5: Sewerage plan of the property, 1917.
COURTESY SROWA. SERIES 634 CONS 4156 ITEM 0226.

Figure 6: Aerial photograph, 1965
COURTESY LANDGATE

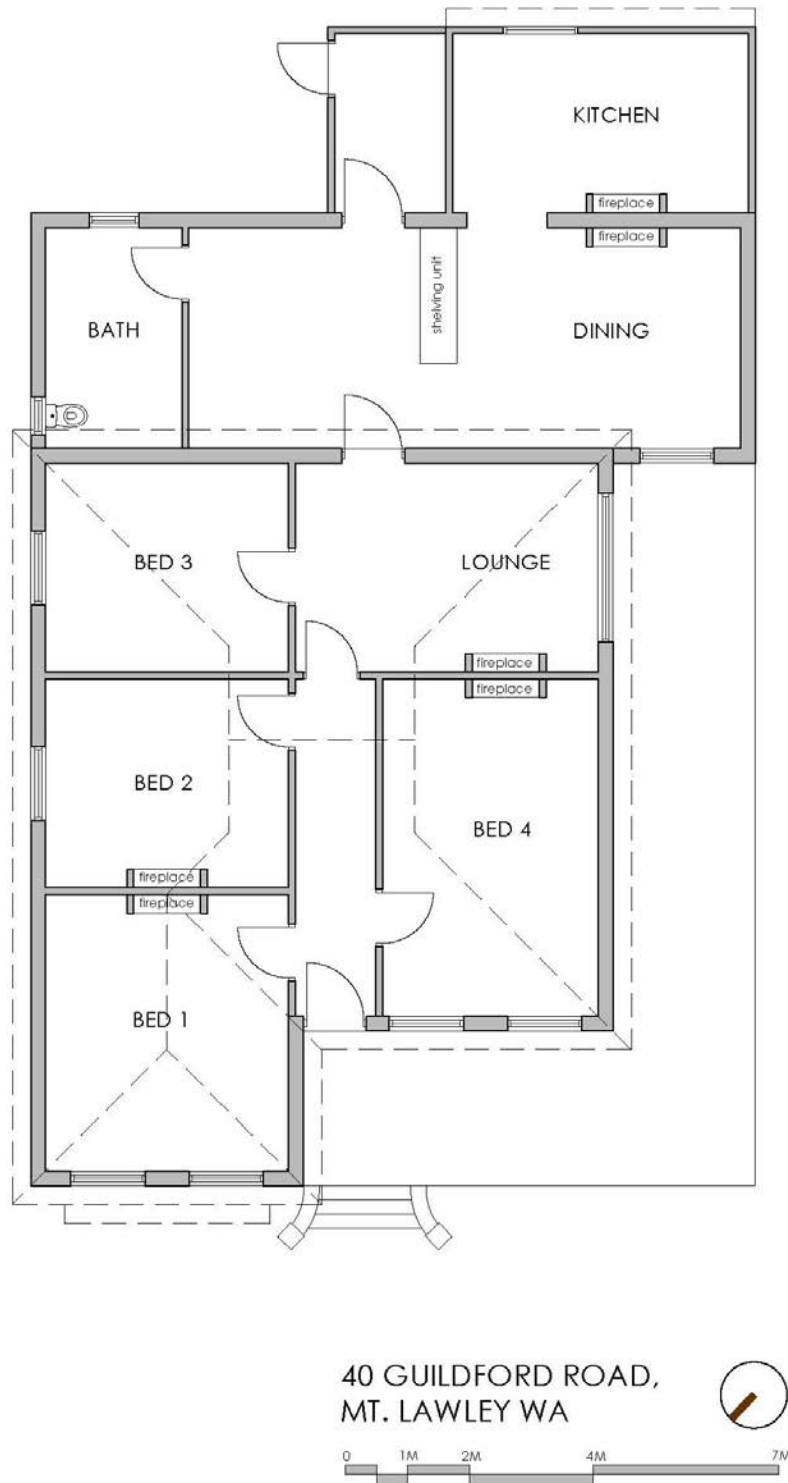


Figure 7: Floor Plan



5.0 Photographs

The following images were taken on 8 March 2023 by Hocking Heritage + Architecture. No access was available to the roof space or underfloor space.

5.1 Streetscape



Figure 8: View southwest on Guildford Road and vacant lot adjacent.



Figure 9: View southwest on Guildford Road towards the Mount Lawley subway.



Figure 10: View northeast on Guildford Road towards subject property.



Figure 11: View of the western elevation across the adjacent vacant lots.



Figure 12: View from the lane at the rear of the property.



Figure 13: View from the lane at the rear of the property.



Figure 14: View from the lane showing the rear property fence and planting.



Figure 15: View from the lane to the western elevation.



Figure 16: View showing relationship to Guildford Road.



Figure 17: View showing relationship to Guildford Road.



Figure 18: Properties on the northern side of Guildford Road.



Figure 19: View to buildings on the northern side of Guildford Road.

5.2 Elevations and Landscape

The majority of the exterior of the original residence still demonstrates the brick construction with concrete bands and some remnants of tuckpointing. Large areas of the external walls have graffiti and the surrounding grounds are in poor condition although there are some mature trees.



Figure 20: Front Elevation



Figure 21: Front Elevation



Figure 22: Front Elevation.



Figure 23: Front Elevation.

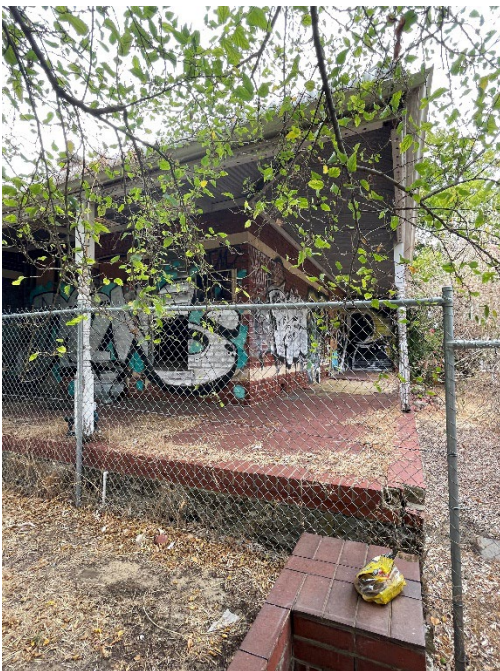


Figure 24: Front Elevation showing verandah.



Figure 25: Front Elevation showing original steps.



Figure 26: Rear Elevation.



Figure 27: Rear Elevation.



Figure 28: Rear Elevation.



Figure 29: Rear Elevation.



Figure 30: West Elevation.



Figure 31: East Elevation.



Figure 32: Remnant planting on the east side of the house



Figure 33: Overgrown creeper on the west elevation.



Figure 34: Rubble and degraded plants on the west side of the lot.



Figure 35: Fenced western side of the lot and some remnant hardscaping.



Figure 36: View of the mature trees in the backyard from the lane.



Figure 37: Back yard.

5.3 Internal Photographs

The interior of the property was poorly lit and difficult to navigate because of the removed floorboards and accumulation of debris. The following photographs demonstrate that the majority of detail has been removed. Apart from some original floorboards there are no architraves, skirtings or doors. There is also asbestos sheeting in the rear of the building.



Figure 38: Front Door.



Figure 39: Hallway.



Figure 40: Hallway.



Figure 41: Hallway.



Figure 42: Bedroom



Figure 43: Bedroom.



Figure 44: Bedroom



Figure 45: Bedroom 1.



Figure 46: Bedroom 1.

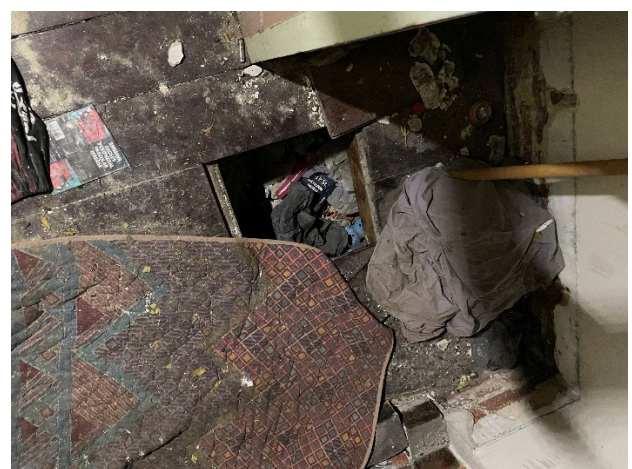


Figure 47: Detail of floorboards.



Figure 48: Bedroom 2.

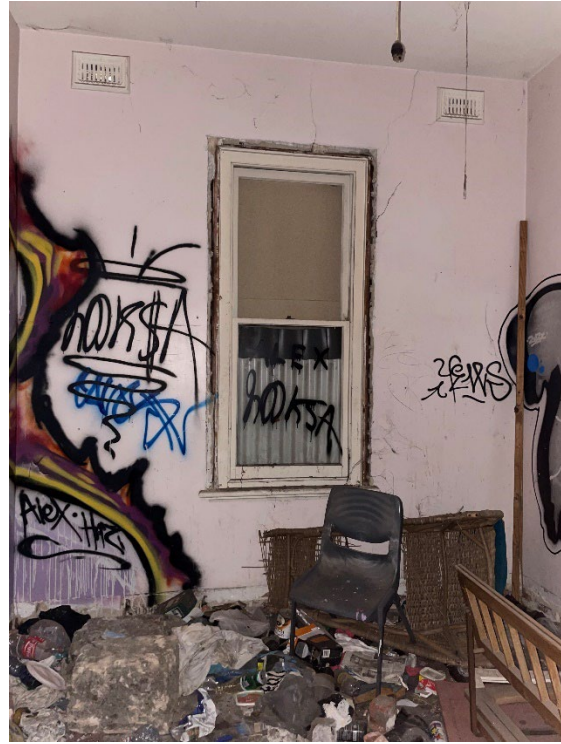


Figure 49: Bedroom 3.



Figure 50: Lounge Room.



Figure 51: Lounge Room.



Figure 52: Lounge Room



Figure 53: Lounge Room



Figure 54: Dining Room (former kitchen)

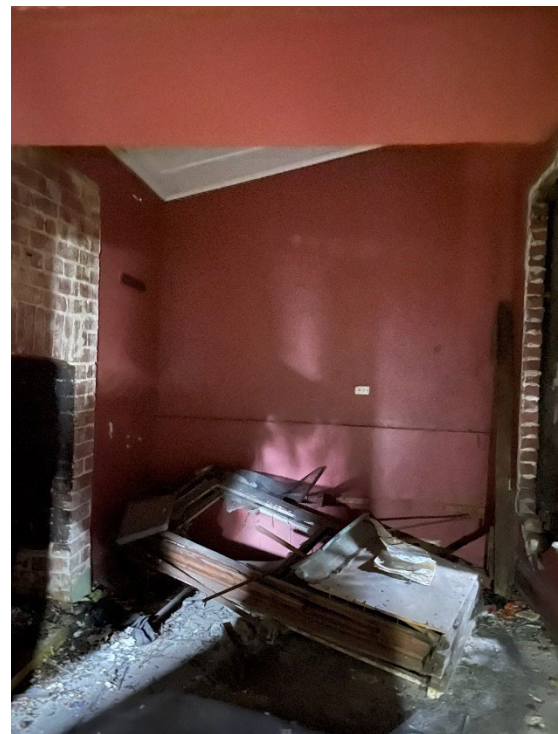


Figure 55: Dining Room (former kitchen)



Figure 56: Kitchen.



Figure 57: Kitchen ceiling.



Figure 58: Kitchen alcove.



Figure 59: Kitchen.



Figure 60: Sleepout looking through to Dining Room.



Figure 61: Sleepout looking through to Dining Room.



Figure 62: Bathroom door and ceiling.



Figure 63: Bathroom.

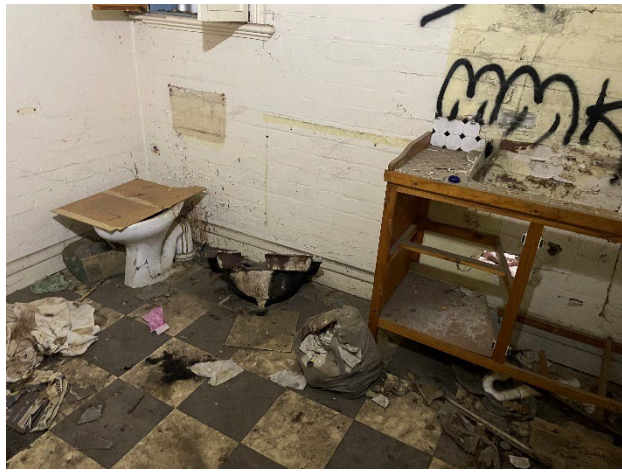


Figure 64: Bathroom.



Figure 65: Bathroom window.

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Department of Planning,
Lands and Heritage



P3138, LOT 254 (40) GUILDFORD RD, MOUNT LAWLEY
Photographic Archival Record



HOCKING HERITAGE + ARCHITECTURE

March 2023

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Figure 54:	Dining Room (former kitchen)	23



Figure 55: Dining Room (former kitchen)23
 Figure 56: Kitchen.24
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 Figure 60: Sleepout looking through to Dining Room.25
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 Figure 62: Bathroom door and ceiling.25
 Figure 63: Bathroom.25
 Figure 64: Bathroom.26
 Figure 65: Bathroom window.26



1.0 Background

This photograph archival record has been prepared at the request of the Department of Planning Lands and Heritage. Demolition is proposed for the building to enable future development of this site and adjacent properties on Guildford Road and East Parade, Mount Lawley.

This place was considered by the Department of Planning Lands and Heritage for inclusion in the State Register of Heritage Places in 2002 and was found to be below threshold for inclusion.

The place has been identified by the City of Vincent as a Moderate Level of Significance which is described as:

Contributes to the heritage of the locality. Has some altered or modified elements, not necessarily detracting from the overall significance of the place.

Management Category B - Conservation Recommended

Consider for inclusion on the MHI (Heritage List) if owner/applicant consents to inclusion.

This Archival Record has been prepared to enable the development of the site whilst recognising the heritage values of the place.

2.0 Statement of Significance

The City of Vincent have prepared the following statement.

The house at 40 Guildford Road is a substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity.

3.0 Location

The property is located on the south east side of Guildford Road in the block bound by Stanley Street and East Parade.

The property is located across two lots; lot 254 (40) on Plan 2001 and lot 403 on Deposited Plan 31182 as designated on Certificate of Title Volume 2209 Folio 50.

On either side of the lot are vacant lots where former residences of a similar age were located.



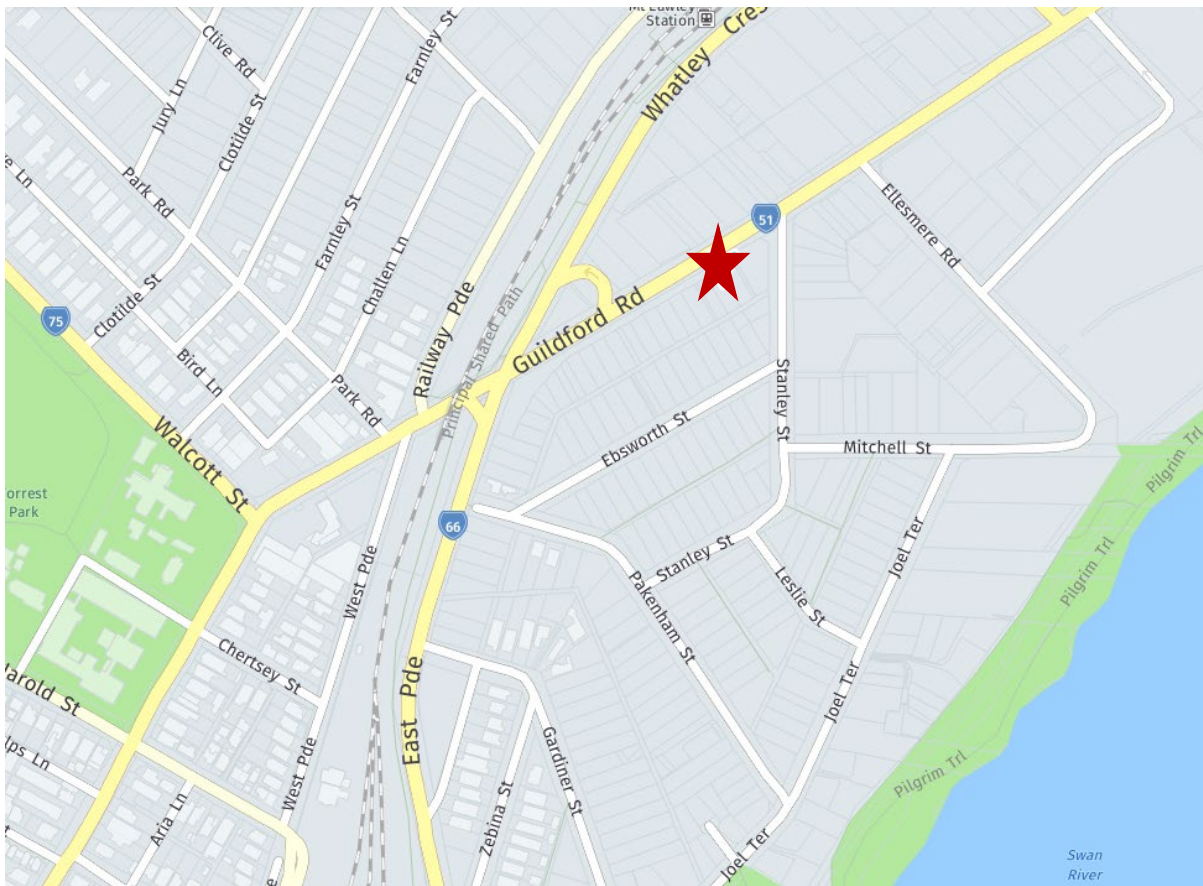


Figure 1: Location Plan

COURTESY NEARMAP



Figure 2: Lots 254 and 403 (40) Guildford Road Mount Lawley.

COURTESY CITY OF VINCENT INTRAMAPS



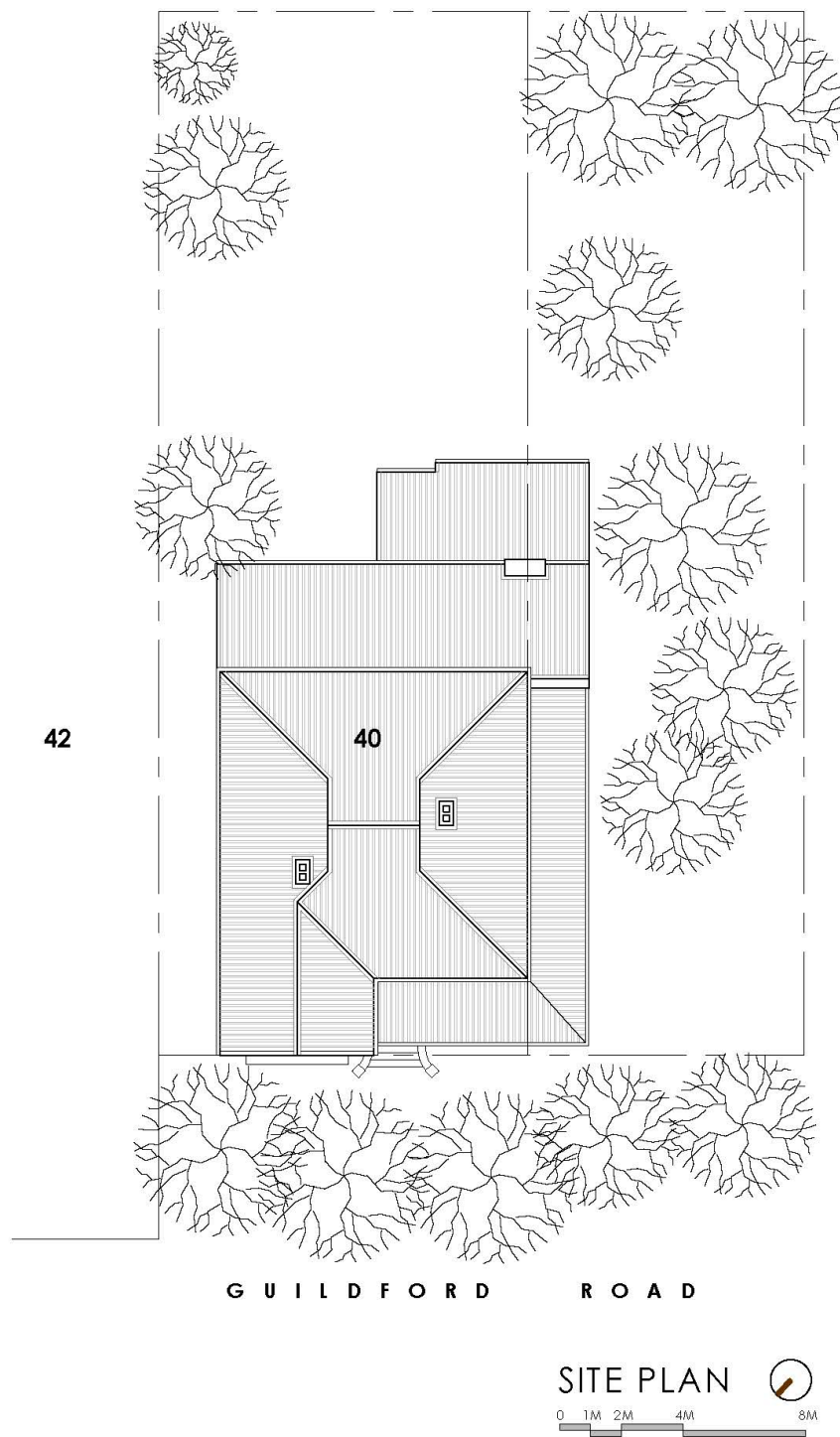


Figure 3: Site Plan



4.0 Brief History

*This history has been expanded from the research prepared for the City of Vincent Local Heritage Survey. Acknowledgement is extended to the authors of that documentation.*¹

This section of Guildford Road is part of the East Norwood Estate which was developed in 1898, on part of Locations A4 and A5, on the eastern side of the Fremantle-Guildford Railway line, in the East Perth/Mt Lawley area. The subdivision was carried out by surveyors Crossland & Hardy on behalf of the Perth (WA) Estate Company Limited of 364 Hay Street.

The strong demand for new housing was a result of the population boom created by the gold discoveries in the State. One member of the Perth (WA) Estate Company was Zebina Lane, who was an engineer and mine owner at the Great Boulder mines, and one of a number of people who made money in gold mining and reinvested it in land developments during this period. The Company had previously developed the adjoining Westralia Estate on the west side of the railway line on Location A4. The estate was promoted as having 'splendid building lots', 'made roads' and 'river frontages'. In the latter case these were the larger blocks along Joel Terrace which were expected to attract the wealthier buyers. It is evident from the subdivision map that this was not one of the earliest blocks sold, the earliest being those used for 'spec' and rental housing along the railway line (East Parade), Bramall and Summers Street.

The estate's boundary nearest to the subject place was Stanley Street (two house blocks from No. 40), which later became the boundary between the Town of Vincent (formed 1995) and that portion of Mount Lawley which is in the City of Stirling. This section of Guildford Road was listed in the Wise's Post Office Directories initially as 'Guildford old road' and by 1905 it was known as 'Old Guildford Road' and listed in conjunction with Lord Street. Around 1908 it became known as 'Guildford Road, Norwood' and it remained so until the 1940's.

No 40 Guildford Road, was well positioned for access to Perth's train system via the nearby Mount Lawley Station. Then in 1924 a single tram track was laid from the tram terminus on the corner of Lord and Lincoln Streets through the Mount Lawley Subway to Maylands. In 1939 this line was duplicated, and the Subway widened to accommodate the second track. This further improved access to the city.

In 1925 the resident was Herbert Illingworth. At that time the area around the Mount Lawley Subway (just a street block away) was a thriving village. The shops and businesses also listed in the Directories were No. 1 Guildford Road Methodist Church, No. 3 plumber, No. 5 Laundry, Nos. 8 - 10 butcher, No. 12 fancy goods and draper, No. 14 confectioner and grocer, No. 15 newsagent, stationer, tobacconist and State Savings Bank agency, No. 18 tobacco and fancy goods and No. 19 butcher. In 1.

The subdivision plan for this property was approved in 1898 and lots were purchased from the developer British Westralia Syndicate Limited.² Lots 253 and 254 were purchased in 1902 by Alice Victoria McColl.³

Alice Victoria McColl (c1863-1914) was the wife of railway employee, Stawell Austral McColl (c1861-1916). From the available evidence in the Post Office Directories and Electoral Rolls the place was built in 1904 as A. McColl is recorded living in Guildford Road in 1905. The builder or architect of the residence has not been determined. It is likely that a local builder, such as John Berne Hawkins who lived in Guildford Road, constructed the home in accordance with readily available plans from pattern books that were in common usage at the time. The plan form and remaining detail of the building indicate that the home was of some quality and not a cottage for occupants of limited

¹ Place 3818 House, City of Vincent InHerit database entry. Adopted 2006.

² Certificate of Title, 161/20, Landgate.

³ Certificate of Title, 161/20, Landgate.

income. This conclusion is also supported by the evidence that the residence occupied more than one lot it and was set in a more expansive garden setting.⁴

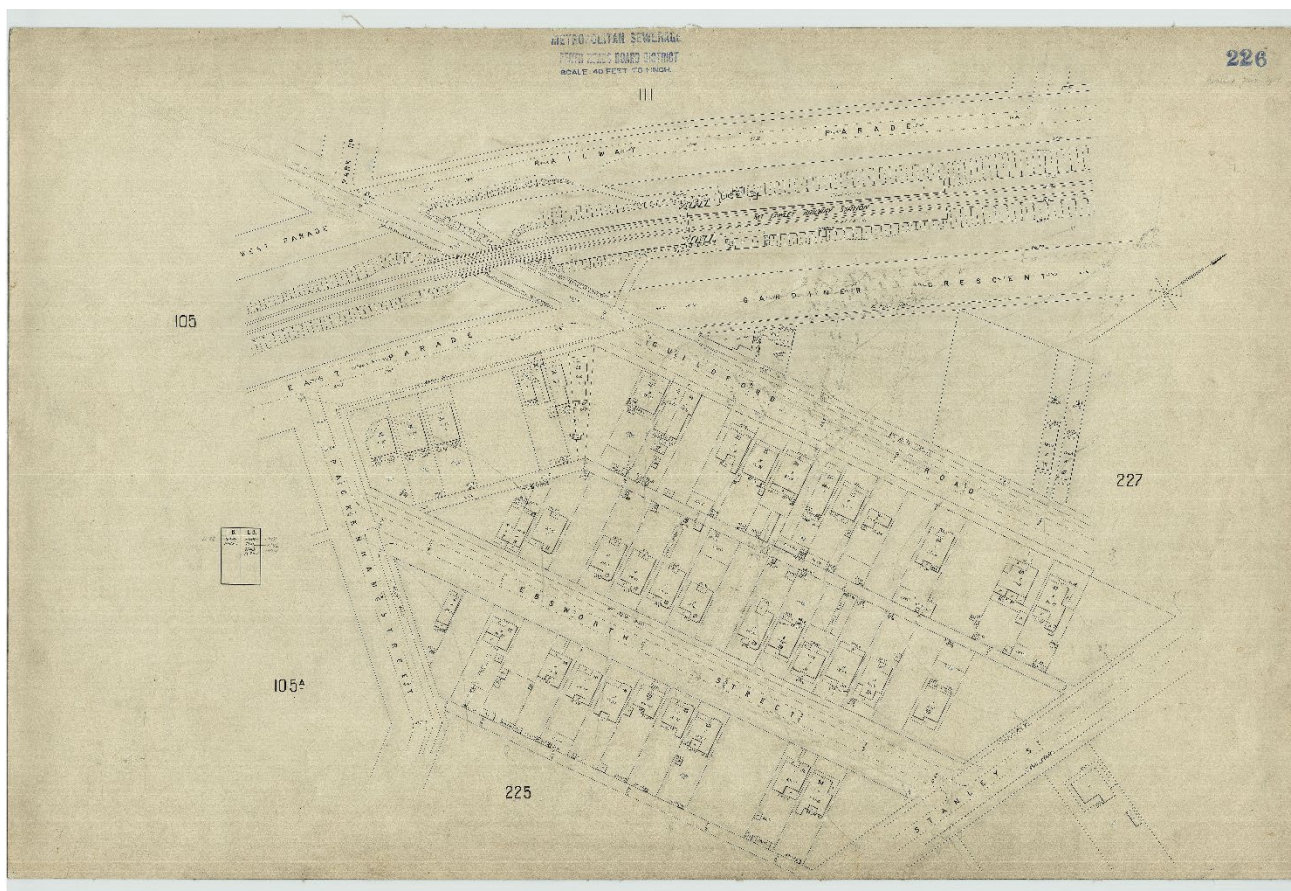


Figure 4: Sewerage Plan Sheet 226, 1917.

COURTESY SROWA SERIES 634 CONS 4156 ITEM 0226

The McColls appear to have lived in the place until c1911 and subsequently leased the place to tenants. A newspaper article from March 1911 records that Stawell and Alice McColl were living in St Georges Terrace Perth at that time.⁵

Post Office Directories record that there was a rapid turnover of occupants between 1912 and 1915 and was then occupied by caterer Andrew Cavanagh and his wife Jane until 1918.

In 1914, Alice McColl died, and the property transferred to Stawell McColl, and on his death in 1916 the property was transferred to their children, Alice Sophia McColl and Archibald Dougald McColl.⁶ The siblings continued to lease the property to tenants, traveller Herbert Illingworth and his wife Ethel Illingworth from 1919 to 1926.⁷

In 1926, the property was transferred to clerk Frederick William James Joyce (c1893-1973) and his wife Eunice Hilda Joyce, nee Bevan (c1895-1977). The couple married in 1914 and had at least four children and lived at this house until the 1970s. Frederick Joyce died in 1973 and Eunice lived on in the house until at least 1975 when the place was transferred to draftsman William Richard Marks and

⁴ Sewerage Plan Sheet 226 shows the width of the lot is larger than the majority of the housing lots adjacent.

⁵ *The West Australian*, 29 March 1911, p. 4.

⁶ Certificates of Title, 682/184 and 682/185, Landgate.

⁷ Post Office Directories, State Library of WA, [Post office directories | State Library of Western Australia \(slwa.wa.gov.au\)](https://www.slsa.wa.gov.au/post-office-directories) accessed February 2023.

Public Relations Officer Lynette Marks.⁸ The couple lived at the house until 1986 when the house was transferred to the Western Australian Planning Commission.⁹ With the transfer of the property to the WAPC the residence was leased to tenants.

Aerial photographs from the mid 20th century indicate that the extent and form of the residence have not changed considerably since that time. The WAPC and its subsequent authorities maintained the property when it was occupied by tenants including the replacement of the roof cladding in the late 1980s.

The physical evidence suggests that the timber verandah was replaced in the late 1980s with the current verandah which is brick laid on sand.

The houses located to the south of the 40 Guildford Road were demolished in 2000, and the house to the north was demolished c2009. The original residential context of this portion of Guildford Road has been lost as a result of these changes.

The residence has been unoccupied for several years and is in a very poor condition.

4.1 Occupants and owners

DATE	OWNERS	OCCUPANT
1898 - 1902	British Westralia Syndicate Limited	None
1902 - 1918	Alice Victoria McColl	1905 – 1911 Stawell Austral McColl and Alice Victoria McColl. 1912 William J Franz 1913 Frederick W Koeppe 1914 John Dillon and Haswell Bromley 1915 - 1918 Andrew and Jane Cavanagh
1918 - 1926	Alice Sophia McColl and Archibald Dougald McColl	1919 - 1926 Herbert Illingworth
1926 – 1975	Frederick William Joyce and Eunice Hilda Joyce.	Frederick William Joyce (until 1973) and Eunice Hilda Joyce.
1975 - 1986	William Richard Marks and Theresa Barbara Marks	William Richard Marks and Theresa Barbara Marks
1986 - 2001	Western Australian Planning Commission	Various
2001 – 2023	Western Australian Planning Commission (Dept of Planning Lands and Heritage)	Various and vacant

⁸ Certificate of Title 1033/111, Landgate.

⁹ Certificate of Title 1070/301, Landgate.



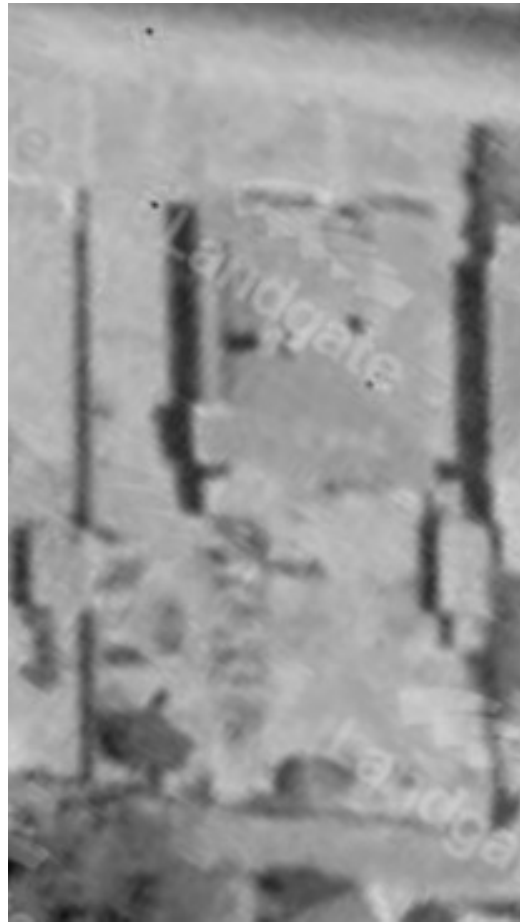
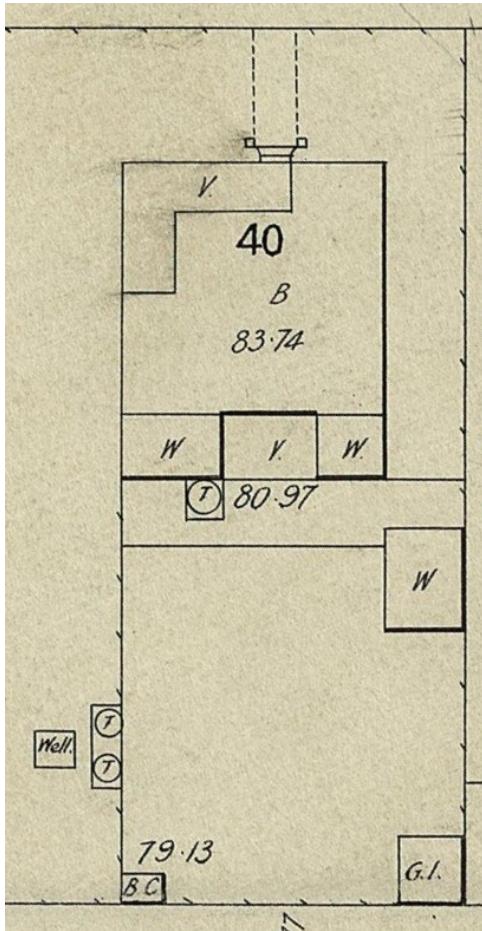


Figure 5: Sewerage plan of the property, 1917.
COURTESY SROWA. SERIES 634 CONS 4156 ITEM 0226.

Figure 6: Aerial photograph, 1965
COURTESY LANDGATE

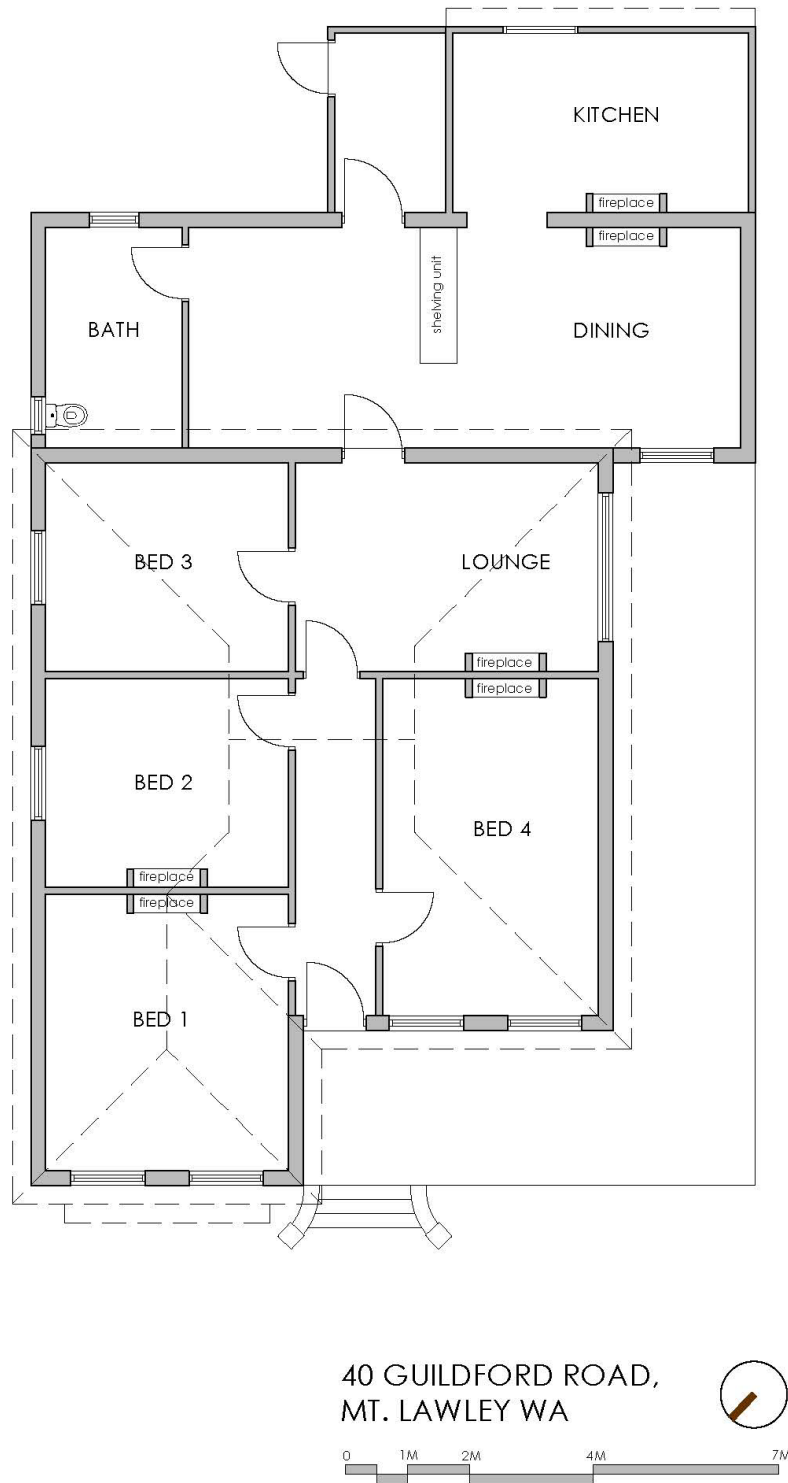


Figure 7: Floor Plan



5.0 Photographs

The following images were taken on 8 March 2023 by Hocking Heritage + Architecture. No access was available to the roof space or underfloor space.

5.1 Streetscape



Figure 8: View southwest on Guildford Road and vacant lot adjacent.



Figure 9: View southwest on Guildford Road towards the Mount Lawley subway.



Figure 10: View northeast on Guildford Road towards subject property.



Figure 11: View of the western elevation across the adjacent vacant lots.



Figure 12: View from the lane at the rear of the property.



Figure 13: View from the lane at the rear of the property.



Figure 14: View from the lane showing the rear property fence and planting.



Figure 15: View from the lane to the western elevation.



Figure 16: View showing relationship to Guildford Road.



Figure 17: View showing relationship to Guildford Road.



Figure 18: Properties on the northern side of Guildford Road.



Figure 19: View to buildings on the northern side of Guildford Road.

5.2 Elevations and Landscape

The majority of the exterior of the original residence still demonstrates the brick construction with concrete bands and some remnants of tuckpointing. Large areas of the external walls have graffiti and the surrounding grounds are in poor condition although there are some mature trees.



Figure 20: Front Elevation



Figure 21: Front Elevation



Figure 22: Front Elevation.



Figure 23: Front Elevation.



Figure 24: Front Elevation showing verandah.



Figure 25: Front Elevation showing original steps.



Figure 26: Rear Elevation.



Figure 27: Rear Elevation.



Figure 28: Rear Elevation.



Figure 29: Rear Elevation.



Figure 30: West Elevation.



Figure 31: East Elevation.



Figure 32: Remnant planting on the east side of the house

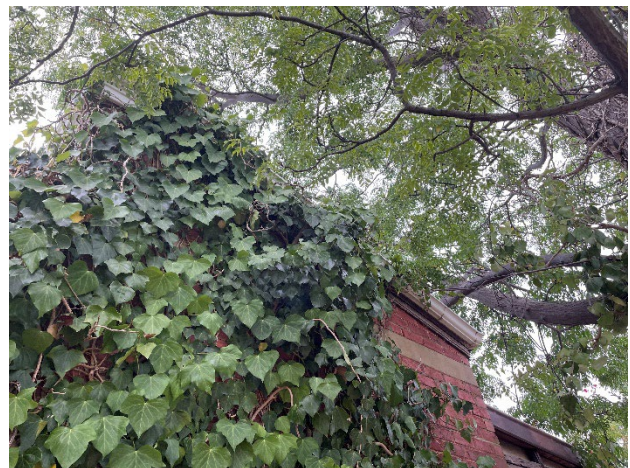


Figure 33: Overgrown creeper on the west elevation.



Figure 34: Rubble and degraded plants on the west side of the lot.



Figure 35: Fenced western side of the lot and some remnant hardscaping.



Figure 36: View of the mature trees in the backyard from the lane.



Figure 37: Back yard.

5.3 Internal Photographs

The interior of the property was poorly lit and difficult to navigate because of the removed floorboards and accumulation of debris. The following photographs demonstrate that the majority of detail has been removed. Apart from some original floorboards there are no architraves, skirtings or doors. There is also asbestos sheeting in the rear of the building.



Figure 38: Front Door.



Figure 39: Hallway.



Figure 40: Hallway.



Figure 41: Hallway.



Figure 42: Bedroom



Figure 43: Bedroom.



Figure 44: Bedroom



Figure 45: Bedroom 1.



Figure 46: Bedroom 1.

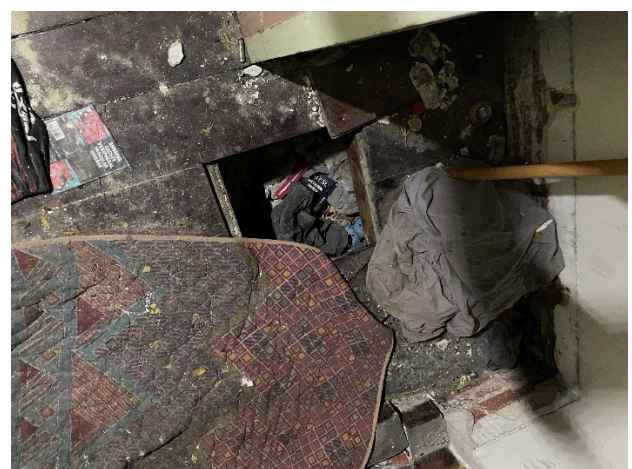


Figure 47: Detail of floorboards.



Figure 48: Bedroom 2.

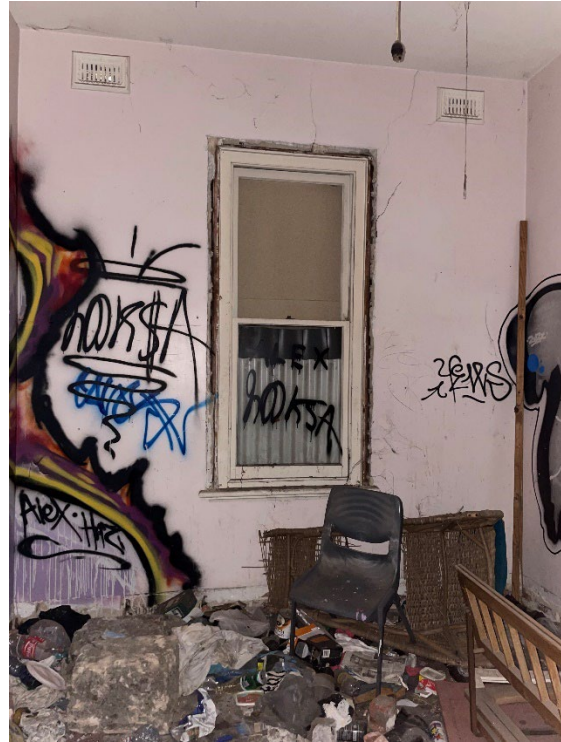


Figure 49: Bedroom 3.



Figure 50: Lounge Room.



Figure 51: Lounge Room.



Figure 52: Lounge Room



Figure 53: Lounge Room



Figure 54: Dining Room (former kitchen)

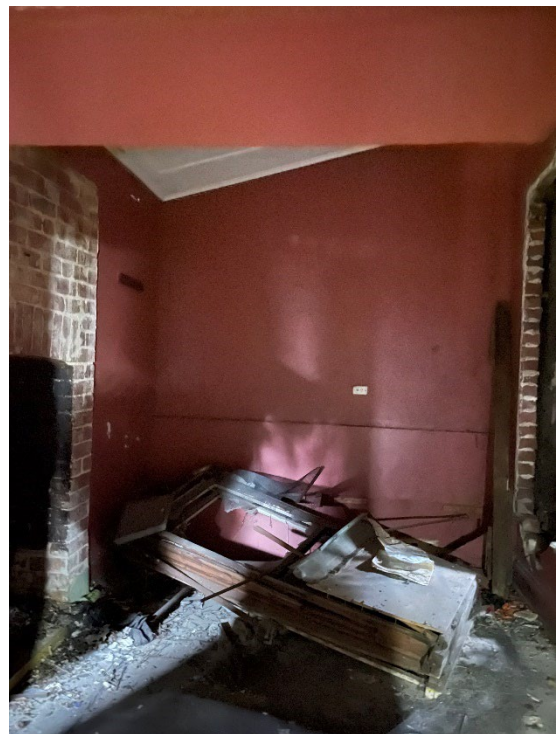


Figure 55: Dining Room (former kitchen)



Figure 56: Kitchen.



Figure 57: Kitchen ceiling.



Figure 58: Kitchen alcove.



Figure 59: Kitchen.



Figure 60: Sleepout looking through to Dining Room.



Figure 61: Sleepout looking through to Dining Room.



Figure 62: Bathroom door and ceiling.



Figure 63: Bathroom.

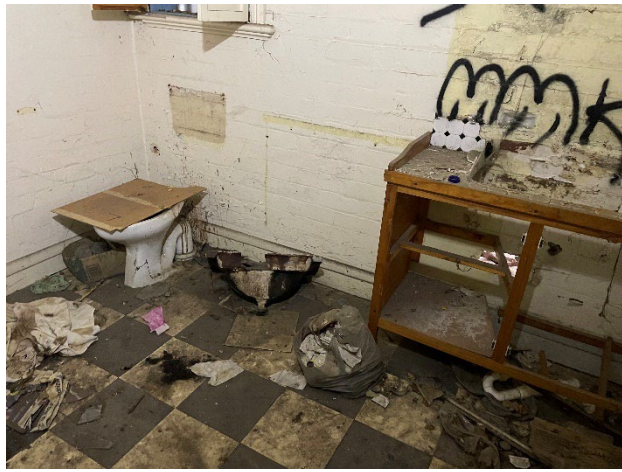


Figure 64: Bathroom.



Figure 65: Bathroom window.

Summary:

The subject site is a Category B place on the City’s MHI meaning that it’s on the heritage list and ‘conservation is recommended’. It was originally listed in 2006 as a ‘substantial and good example of the Federation Arts and Crafts style, which demonstrates the aspirations of the original developers for this neighbourhood before the growth of traffic on Guildford Road impacted so heavily on amenity’. This statement of significance identified its aesthetic value as a Federation Arts and Craft building and therefore has more than just ‘social and historic significance as detailed in Figure 1 of LPP7.6.5.

Over the last 17 years the subject site has been neglected, which has resulted in degradation of the building and a significant loss of its heritage values. The Heritage Impact Statement prepared by Hocking Heritage + Architecture in 2023 states that the building is in a very poor condition and supports demolition. There is no structural engineers report that supports the assessment of condition or whether the remediation of the building would impact on its significance. This would need to be provided in accordance with the LPP 7.6.5 before we could support demolition.

Under the City of Vincent’s Heritage Policy 7.6.5, the requirements under Figure 1 state that to delete a building from the MHI, the application needs to demonstrate any one of the following criteria (which are listed in Table 1 below). The information provided does not sufficiently address the City’s requirements and in my opinion based on the information provided that the property could be restored back into a residential function without irreversibly impacting the significance of the property.

Table 1 – The heritage provisions of the City’s Local Planning Policies (LPP) in relation to the subject site.

LPP	Provision	Compliance with Provision	DRP Comment	Applicants Comment
LPP 7.6.1: Heritage Management – Development Guidelines for Heritage and Adjacent Properties	‘Table 1 – Planning Requirements’ notes that planning approval from the City is required where demolition of a heritage place is proposed.	Partly Complies. While planning approval from the City is currently being sought, it does not provide the sufficient level of information (i.e. structural engineer’s report) for decision to be made.	LPP7.6.1 refer to a clause 5.4. of LPP7.6.5 which appears no longer to be relevant. This should be reviewed prior to making a determination.	Noted.
LPP 7.6.2: Heritage Management – Assessment	Table 1: Gradings of Heritage Significance for Heritage Places Heritage places listed with Category B are of moderate significance is considered for inclusion on the MHI (Heritage List) if owner/applicant consents to inclusion	Does not comply. As a category B place the City should be encouraging conservation.	The subject site is currently listed as having moderate significance which is why it is listed in the MHI. The prolonged period of neglect by the owner has resulted in damage to the heritage fabric and this should be a consideration forming part of any determination relating to demolition.	Note the existing category of the building. The subject lot was originally acquired by the State for the purpose of delivering major road upgrades along Guildford Road and East Parade. Other properties acquired for the same purpose have previously been demolished in preparation for the future upgrades. The subject dwelling has been retained as far as practicable in the interim to allow for the final land requirements to be determined in order to understand the impact to the dwelling and the potential for retention. Main Roads have progressed development of plans for the road upgrades and now have an endorsed land requirement plan which confirms the extent of additional road widening necessary in order to facilitate the upgrades.
LPP 7.6.5: Heritage Management – Amendments to the MHI	Figure 1 – Deleting a place from MHI The Council will only consider deleting a place from MHI in the following scenario: Cultural Heritage Significance -	Does not comply. The cultural heritage significance of the place in the existing heritage assessment is largely accurate.	The cultural heritage significance of the subject site was not classed as ‘erroneous’ in 2007 during the last assessment. It was noted in 2007 that the integrity of the historic setting had been compromised. Since then, the increased traffic on Guildford Road has led to an acceleration in the changes to the streetscape and its original neighbourhood context. In 2007, the place was occupied and demonstrated its original use and	The DRPs comments in relation to the current representation of the dwellings style and the heritage significance of the dwelling in its current form are noted. The demolition of the dwelling is to be considered taking into account the impact that planned road widening and road upgrade works will have on the dwelling. The amended DA submission report addresses the extent of the road widening and associated impacts in detail and provides relevant supporting documents and plans. The extent of building modifications that will be

			<p>much of its original detail. In 2023, the HIS has stated that:</p> <p>'the place is no longer habitable and original fabric has been stripped from the place and the remaining fabric is in poor condition. To make the place viable for use would require removal of the structures across the rear of the property and replacement of much of the remaining fabric in the front rooms of the place'</p> <p>This does not necessarily mean the aesthetic or historic values will be diminished. However, I agree in its current condition the place is not a 'good example' of its style.</p> <p>The above-mentioned factors confirm that the cultural heritage significance of the subject site remain largely as stated.</p>	<p>required in order to facilitate the widening of Guildford Road will have a material impact on the fabric of the building and detrimentally impact the primary frontage and its relationship with the streetscape. As noted in the HIS, considering the extent of this impact combined with the current poor-quality representation of the dwelling style, it is not considered that the dwelling could be sustained and retain its heritage values. On this basis, it is considered that the dwelling should be removed from the heritage inventory to allow for demolition.</p>
LPP 7.6.5: Heritage Management – Amendments to the MHI	<p>Figure 1 – Deleting a place from MHI</p> <p>The Council will only consider deleting a place from MHI in the following scenario: Condition - The poor state of a place should not in itself be a reason for removal from MHI. Deletion of a place from MHI will only be considered if a structural condition report conducted by a registered structural engineers state that the structural integrity of the place has failed to the point where it cannot be rectified without the removal of a majority of its significant fabric.</p>	<p>Does not comply.</p> <p>A structural engineer's report has not been provided. The statement of 'very poor' condition has therefore not been validated.</p>	<p>Without a structural engineer's report confirming the structural condition and the extent of necessary rectification. Demolition should not be supported. It should be noted that removal of the rear portions of the building and internal elements may not necessarily impact the significance of the place as stated within the HIS.</p>	<p>The application does not seek to demolish the building based on its current structural condition.</p> <p>As discussed above, the dwelling will be significantly impacted by road widening on Guildford Road required for the delivery of major upgrades to the intersection of Guildford Road and East Parade. The dwelling encroaches into the ultimate road reserve area and will require partial demolition and significant modification affecting the primary frontage in order to be retained. Given this, as noted in the HIS, it is not considered that the dwelling could be sustained and retain its heritage values.</p>
LPP 7.6.5: Heritage Management – Amendments to the MHI	<p>Figure 1 – Deleting a place from MHI</p> <p>The Council will only consider deleting a place from MHI in the following scenario: Social or Historic significance only - Where the heritage value is historic and/or social only the owner/applicant can demonstrate that it cannot practically be retained in its entirety or in part because: The location of the building on the site; or The limited Vehicular Access to the site and non-compliance with Australian Standards; or The inability to comply with the National Construction Codes Series e.g. ramps, corridor widths etc.; or The inability of the existing building structure or materials to be incorporated</p>	<p>Does not comply.</p> <p>The property has aesthetic value identified in the statement of significance.</p>	<p>The aesthetic, historic and social values of the subject site remain apparent despite some loss of form and original detail, which are attributed to years of neglect, vandalism and the deterioration of the remaining fabric. Those elements that have been lost or damaged could be restored as part of a future residential function.</p>	<p>The subject lot was originally acquired by the State for the purpose of delivering major road upgrades along Guildford Road and East Parade. Other properties acquired for the same purpose have previously been demolished in preparation for the future upgrades. The subject dwelling has been retained as far as practicable in the interim to allow for the final land requirements to be determined in order to understand the impact to the dwelling and the potential for retention. Main Roads have progressed development of plans for the road upgrades and now have an endorsed land requirement plan which confirms the extent of additional road widening necessary to facilitate the upgrades. The plan confirms that the road widening will materially impact on the fabric of the dwelling. The front of the dwelling will encroach into the future road reserve such that it will need to be partially demolished and substantially modified in order to be retained.</p>

	<p>into the new development; or The inability of the existing building to support additional height and bulk to the intention of the locality as prescribed in the relevant planning policy.</p>			<p>As a result, the historical fabric and character of the dwelling will be diminished to a point where the value no longer warrants its retention. Further to this, the changes to the street layout and the proximity of the street edge to the front of the dwelling will fundamentally alter the context and relationship of the dwelling to the streetscape, losing its authenticity and historic value.</p> <p>As discussed and as noted in the HIS, considering the material impact the extent of road widening will have on the fabric of the dwelling combined with the current poor-quality representation of the dwelling style, it is not considered that the dwelling could be sustained and retain its heritage values.</p>
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City of Vincent Officer Comment	DPLH Response
<p>1. Structural Integrity</p> <p>a) For the City to support the properties removal based on its current structural condition, the City will need to see a Structural Engineers Report which states that the property is in a poor condition that cannot be rectified. Whilst the City agrees that the current condition of the property can be considered poor, the report will need to demonstrate that the house cannot be restored to a habitable standard. At this moment in time, it is the City's opinion that the development can be restored to a functional and habitable state without impacting its heritage significance.</p> <p>b) I would refer to the recent DAP applications on Cowle Street, West Perth (28-40 and 48-50) where heritage properties were restored and incorporated into apartment developments.</p>	<p>a) It is established that the current condition of the property at No. 40 Guildford Road can be considered poor, noting the existing dwelling is derelict, in a state of disrepair and currently boarded up.</p> <p>Based on the current extent of the Primary Regional Roads reservation under the MRS, it is considered that it may be possible to restore the existing dwelling to a habitable standard without impacting the ability to undertake future upgrades to the intersection of Guildford Road and East Parade. However, as detailed below MRWA has confirmed there is additional land (beyond the current extent of the PRR reservation) where the existing dwelling is currently located that will be required for future upgrades.</p> <p>MRWA's ultimate land requirements for future upgrades to the intersection of East Parade and Guildford Road encroach the portion of the site which accommodate the primary frontage of existing dwelling including the verandah, front room, roof structure, steps and associated footings. Based on MRWA's ultimate land requirements, future upgrades to Guildford Road and East Parade will necessitate partial demolition and substantial modification of the existing dwelling. The extent of demolition and modification will have a material impact on the fabric of the existing dwelling such that it is considered the original character of the dwelling will be detrimentally impacted and cannot practically be retained.</p> <p>b) It is acknowledged that numerous instances exist where existing heritage properties have been restored and incorporated into apartment development as part of comprehensive redevelopments. The Department is not aware of any comparable examples where the existing dwelling was impacted by a Primary Regional Road reserve and subject to additional land requirements that will necessitate partial demolition and substantial modification to enable future upgrades.</p>
<p>2. Primary Regional Road Reservation</p> <p>Without the above report, the principal reason for this place's removal from the MHI is the impact of the existing and future road reservation. For this reason, the City will need to see additional information on the reservation, including:</p> <ul style="list-style-type: none"> Imagery showing how much of the current property is affected by the existing PRR and how much it will be affected by the future reservation. This would be a more detailed version of figure 2 which was included in the application letter; Any information from MRWA on the timing of future works/plans for the current PRR; and Any information on the timing of an amendment to the MRS for the ultimate land requirements for the Guildford Road PRR. 	<p>Please refer to amended development application submission report sections 4 and 5 and the report attachments which include an updated Heritage Impact Statement, Main Roads Land Dealings Plan and updated road widening overlay depicting the impact on the existing dwelling.</p> <p><u>Comments attributed to Main Roads WA</u></p> <ul style="list-style-type: none"> <i>The additional land outside the MRS is required for the future intersection upgrade.</i> <i>The concept for the future intersection upgrade has been developed based on traffic modelling and assessment.</i> <i>The current movement from Guildford Road turning left into East Parade is significant and the proposed concept will include double left turn lanes under signal control.</i> <i>Given the significant left turn movements the current proposed length of this needs to be maintained to ensure that vehicles do not queue into the through lanes on Guildford Road creating a traffic safety issue.</i> <i>No access from either East Parade or Guildford Road will be provided. Although this is mentioned in the summary documents this is reiterated to avoid any confusion.</i>

3. Planned Mount Lawley HDP Area

As discussed, additional information on the impact of this property's retention on the wider HDP redevelopment is welcome. Whilst I understand the project is in its infancy, additional information is useful for the City's recommendation to Council.

Noting the extent of the existing dwelling that is located in an area of the site which will be required for future upgrades to the intersection of Guildford Road and East Parade, the building cannot practically be retained.

Notwithstanding the direct conflict regarding the location of the existing building and the ability to undertake future upgrades to the Guildford Road and East Parade intersection under MRWA's ultimate land requirements, the following is noted:

- The subject site forms part of a broader landholding comprised of 34 lots situated along Guildford Road and East Parade referred to as the Mt Lawley HDP site.
- Comprehensive redevelopment of the broader Mt Lawley HDP site will contribute significantly to housing choice and affordability and activate a currently vacant, underutilised government landholding in a key location in proximity to public transport and amenities.
- The broader Mt Lawley HDP site has remained largely vacant and underutilised for more than two decades noting various site conditions and considerations impacting development feasibility in this location:
 - Significant land requirements (beyond the extent of the current PRR reserve) associated with future upgrades to the intersection of Guildford Road and East Parade
 - Land requirements associated with future laneway widening that will be required to provide vehicular and pedestrian access
 - Utility services – the broader HDP site is impacted by significant utility servicing infrastructure relocations and upgrades that will be required to enable its redevelopment
 - Ground conditions – the broader HDP site is subject to challenging ground conditions, particularly in relation to ground water levels that raise additional requirements for the detailed design development and associated construction costs
- Subject to a determination regarding the proposed removal of No. 40 Guildford from the City's MHI, DevelopmentWA will be able to initiate the next stage of the procurement process (Request for Detailed Proposal) and invite shortlisted proponents to commence detailed design development.
- Future upgrades to Guildford Road and East Parade will necessitate partial demolition and substantial modification of the existing dwelling. If there is a requirement to retain the portion of the existing dwelling that is not impacted by future upgrades to Guildford Road, this will have a significant impact on site layout, the provision of vehicle and pedestrian access, servicing, site works and development yield.
- While it is noted that there are examples where heritage buildings have been incorporated as part of large scale redevelopments, often involving the operation of a commercial land use in restored heritage building as part of a mixed-use development proposal, the broader HDP site is zoned for residential land use and has been identified for the delivery of a social housing outcome. Imposing the requirement to incorporate a portion of an existing building as part of a procurement process seeking to facilitate the delivery of social housing is not considered reasonable or appropriate in this instance.

Summary of Submissions – Removal of 40 Guildford Road, Mount Lawley from the Municipal Heritage Inventory

The table below summarises the comments received during the consultation period, together with the Applicant's and Administration's response.

Comments in Support:

Submitters comments	Applicant Comment	Administration Response
<p>I have no objection to the removal of 40 Guildford Road from the City's Municipal Heritage Inventory.</p> <p>It has been an eyesore for more than the last 20 years and has been the subject of squatters and vermin infestation.</p> <p>It has also caught fire on one occasion.</p>	Noted.	Noted.
<p>Saving heritage properties is a good idea, however the property is in a state of disrepair and should have been demolished at the same as the other properties</p>	Noted.	Noted.
<p>The property has fallen into disrepair and its loss, though sad, is acceptable. The property was correctly identified in the past as conservation worthy, but that has now changed. The property was indeed a 'good' example of its time and intent, but not an 'excellent' or 'unique' example. I consider the decline of the building to effectively mean that it has already found itself unconserved. There are potentially some reflections to be had in regard the usefulness of conservation status. Looking forward, the proposed developments for this plot and those alongside are, in my view, a more worthy addition to society and culture for CoV than the preservation of what is now a degraded and dangerous eyesore.</p>	Noted.	Noted.

Comments Objecting

Submitter's Comments	Applicant's Response	Administration's Response
<p>No, I do not support this proposal, it is a home that has been neglected, Instead of the many years of having security patrols evicting squatters and installing fencing, the cost could have been redirected to the restoration of this home which could have been sold or rented. It still has charm and history which could become a home again.</p> <p>I have been a resident here since the original homes were still standing in the right of way behind Ebsworth Street Mount Lawley, when purchasing my property I carried out due diligence and the area was zoned R20. Over the years the rear properties were demolished, with various building proposals put forward from 7.1.1 build form, local planning scheme 2 and how many others, with consultation with rate payer's concerns this is just another episode of the Tv series "Yes minister and Utopia"</p> <p>I'm disappointed that the City of Vincent says it supports taking action on climate change according to the sustainable environment strategy, but I doubt the old 100 year old trees that help make our cities liveable, by shade, by making spaces cooler, and air better quality will just be bulldozed away</p> <p>We keep losing historical buildings, no more. They've neglected it for years in the hope it would be condemned.</p> <p>Demolition by neglect. No approved development application. Community is waiting for this dangerous intersection that is currently operating over-capacity for its design, with hundred-metre queues at peak hour to be fixed.</p>	<p>The Heritage Impact Statement acknowledges the current state of the dwelling as noted in the submissions. However, the character and authenticity of the surrounding streetscape has diminished over time due to the loss of surrounding dwellings and the changing function and capacity of Guildford Road. It is considered that the identified historic value of its role in demonstrating the creation of a neighbourhood clustered around Guildford Road is no longer evident.</p> <p>The subject lot was originally acquired by the State for the purpose of delivering major road upgrades along Guildford Road and East Parade. Other properties acquired for the same purpose have previously been demolished in preparation for the future upgrades. The subject dwelling has been retained as far as practicable in the interim to allow for the final land requirements to be determined in order to understand the impact to the dwelling and the potential for retention. Main Roads have progressed development of plans for the road upgrades and now have an endorsed land requirement plan which confirms the extent of additional road widening necessary in order to facilitate the upgrades. The plan confirms that the road widening will materially impact on the fabric of the dwelling. The front of the dwelling will encroach into the future road reserve such that it will need to be partially demolished and substantially modified in order to be retained. As a result, the historical fabric and character of the</p>	<p>The property is owned by the State Government and is a part of the Mount Lawley Housing Diversity Pipeline (HDP) area. The HDP project aims to identify and offer suitable surplus Government-land to the market for innovative housing developments that provide for social housing and deliver more housing choice for our communities.</p> <p>In addition to being subject to the HDP program, the property is affected by the current and planned Guildford Road reservation which necessitates its removal. Main Roads plans to use the existing and planned road reservation for a future intersection upgrade which will include double left turning lanes under signal control.</p> <p>Detailed design drawings for the redevelopment of the Mount Lawley HDP area have yet to be approved. The City expects that the future provision of trees and retention of existing trees will be subject to a separate development approval process.</p> <p>The proposed road works and HDP program requires the property's removal from the City's Municipal Heritage Inventory and its demolition.</p>

Summary of Submissions – Removal of 40 Guildford Road, Mount Lawley from the Municipal Heritage Inventory

Submitter's Comments	Applicant's Response	Administration's Response
<p>The department spent years buying up land to make room for the upgrades, part of which will now be sold off. Fixing the intersection should be addressed before property demolished or any land is sold. Existing trees should be kept. Important food source for the Forest Red-tailed Black Cockatoos that visit.</p> <p>Maintain our heritage houses that have been there for a hundred years and ultimately enhances the area, rather than the alternate option which devalues the area.</p> <p>This is a house worthy of retention . It compliments existing character in the Banks Precinct.</p> <p>It has been permitted by its owner, The WA Planning Commission, to deteriorate by neglect over the years.</p> <p>It is also important to retain the trees on this lot. .</p> <p>In a warming climate, trees are of immense significance contributing to cooling the environment by creating their own micro climate , storing carbon, reducing radiated heat, conserving wildlife habitat and biodiversity.</p> <p>They are also beautiful.</p> <p>Over the years I have encouraged City Of Vincent to value significant trees on this site. Following the demolition of the houses and businesses that were previously on this land, I have written submissions to City of Vincent Planning Department, Deputy Mayor and officers. The land from No 40 Guildford Road wraps around the corner of East Parade to Gardiner Street and along the rear of Zebina Street.</p> <p>I hope that you will see the value in protecting trees. They include Jacaranda, mulberries (remnants of the East Perth Silk industry.) Eucalyptus species, two very large ficus trees (Port Jackson figs I think)</p> <p>These trees cannot be replaced. They have high social and environmental value. A previous plan from Main Roads Department and Department of Planning and Infrastructure demonstrated 'pocket parks'. I have a copy of this document.</p>	<p>dwelling will be diminished to a point where the value no longer warrants its retention. Further to this, the changes to the street layout and the proximity of the street edge to the front of the dwelling will fundamentally alter the context and relationship of the dwelling to the streetscape, losing its authenticity and historic value.</p> <p>This application is required only to seek approval for demolition of the existing dwelling on Lots 254 and 493 (No.40) Guildford Road. The subject site does not contain any trees that are listed in the City's 'Trees of Significance Inventory'.</p> <p>While it is noted that some of the trees referred to in the submissions do not relate to the subject site, the retention of existing mature trees will be encouraged as part of the wider redevelopment of the lots along Guildford Road and the provision of adequate trees and landscaping will be addressed as part of the future redevelopment of the site which will be subject to a separate development approval process.</p>	

Comments neither Supporting nor Objecting

Submitter's Comments	Applicant's Response	Administration's Response
<p>As the place is not in the State Register of Heritage Places, is not in the vicinity of a place on the Register, is not subject to a heritage agreement, and is not identified as a place warranting assessment by the Heritage Council, we do not wish to comment on the proposal.</p>	<p>Noted.</p>	<p>Noted.</p>