

Response to Submissions of City of Swan Heritage Strategic Plan

Author of Submission	Comment	Response	Action in Strategy
	with the National Trusts such as tax-deductible appeals and a range of partnership opportunities.	It is noted that the City employs an independent Heritage Consultant to provide advice in relation to planning applications. An action of the Strategy (2.3.1) 'aims to achieve an internal resourcing level where Development Applications affecting a heritage-listed place can be firstly assessed in-house with clear pathways as to when input from an external specialist professional may be required.'	Collaborate with the National Trust to explore opportunities for tax-deductible appeals and a range of partnership initiatives. Amend action 1.4.2 as follows: <ul style="list-style-type: none">Develop a reciprocal relationship with the existing Historical Societies, the National Trust to share information and pass on knowledge.
Metropolitan Redevelopment Authority (MRA) Dated: 31 May 2013	The Report doesn't formally recognise the regulatory role of the MRA. The MRA can assist with the delivery of the following actions: <ul style="list-style-type: none">Sharing of relevant heritage informationFeedback on policies and design guidelines addressing the City's heritageContribute towards information sessions and training sessions.	The Report has been amended to recognise the regulatory role of the MRA. Opportunities to capitalise on the expertise of the MRA should be explored.	Additional information has been added to the accompanying Report to recognise the regulatory role of the MRA. Refer to new section 1.5. Amend action 1.4.2 as follows: <ul style="list-style-type: none">Develop a reciprocal relationship with the existing Historical Societies, the Metropolitan Redevelopment Authority to share information and pass on knowledge. Include the MRA in the 'Implementation Responsibly' column for the following actions: <ul style="list-style-type: none">2.1.2 (review of policies)3.5.1 (training) Amend the description of Action 3.2.1 to include the MRA.
Metropolitan Redevelopment Authority (MRA) (cont)	It is requested that the MRA be included on the list of other government agencies The Report should address the Aboriginal Australian Heritage.	Noted This Strategic Plan does not apply to the conservation of natural or Aboriginal heritage except in cases where they form part of a place of	Amend action 4.5.4 as follows: 4.5.4 Collaborate with the

Response to Submissions of City of Swan Heritage Strategic Plan

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		<p>historic cultural heritage significance or a cultural landscape. This approach is consistent with the State Planning Policy 3.5 - Historic Heritage Conservation. Opportunities to further understand the Aboriginal association with the area are invited under Action 1.2.2, which states 'an emphasis should be placed on obtaining stories that relate to the themes identified in the existing thematic history'. Aboriginal occupation is one theme in the matrix.</p> <p>Notwithstanding, opportunities to develop partnerships with the Department of Aboriginal Affairs to share knowledge would be beneficial.</p>	<p>Department of Aboriginal Affairs, Swan Indigenous Reference Group, Southwest Aboriginal Land and Sea Council and traditional owner family groups to share information and pass on knowledge.</p>
	If it is not possible to address Aboriginal Australian Heritage the report should be amended to reflect its focus on European Heritage.	<p>The Strategy could be amended to reflect its emphasis on European heritage. If such an amendment was required it is recommended that the word 'historic' be inserted in the title to reflect the terminology used in <i>State Planning Policy 5.3 Historic Heritage Conservation</i>.</p>	<p>Actions have been included to develop partnerships with Aboriginal stakeholders to share knowledge (Action 4.5.4).</p>
B Dundas Dated: 26 February 2013	The document does not adequately highlight the significance of either Guildford or the Swan Valley.	<p>The Strategy takes a holistic view on the conservation and protection of the City's heritage without an emphasis on one component. Notwithstanding this, in recognition of Guildford's significance Action 4.4.1 recommends that the City should nominate Guildford for State and National Heritage Listing.</p>	No action required.
B Dundas (cont)	There needs to be a Heritage Officer as a High Priority.	<p>The Strategy recommends that the City appoint a Heritage Officer or Co-ordinator as a matter of high priority (Action 3.1.1).</p>	No action required.
	There needs to be a strategy in place before the MHI is removed and the Heritage List becomes the only list. Many Councilors use placement on the Heritage List or MHI as a decision making basis e.g. non inclusion means no heritage significance.	<p>The MHI is an information source of places of local heritage value, however inclusion on the MHI has no statutory implications/protection. It is not appropriate to use this list for the basis of making statutory decisions.</p> <p>Action 2.1.1 of the Strategy identifies, that as a</p>	No action required.

Response to Submissions of City of Swan Heritage Strategic Plan

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		high priority, a concise document should be prepared which articulates the differences and implications of the State Register of Heritage Places, the Local Government Inventory, the Heritage List and Heritage Areas.	
	There needs to be a review to ensure all listed places have a statement of significance.	Action 1.1.2 recommends that a review of existing Place Record Forms for places on the City's MHI and Heritage List needs to be undertaken to ensure information is correct and comprehensive, and that there is a robust and detailed statement of significance for each place.	No action required.
	Give a time line of priority actions, starting with protection of what exists.	Actions are subject to budget processes and hence a timeline may be swiftly outdated and superseded. Each action has a time priority, which is considered sufficient for the purpose of the Strategy.	No action required.
	Outline important principles for Future Conservation Policies and Plans	Appendix A of the <i>Report for the City of Swan Heritage Strategic Plan</i> outlines aspects of the policy that need to be reviewed.	No action required.
	Need to review the Conservation Policy and Building Guidelines in Guildford to prevent the loss or historic and core fabric of the town.	Action 2.1.2 requires the Policy/Guidelines for Guildford to be reviewed.	No action required.
B Dundas (cont)	There needs to be in place something that recognises streetscape value, local cultural heritage values and this needs to include sites and landscapes.	The framework of the City's Heritage is an appropriate mechanism to protect streetscape value in Guildford and Woodbridge. Accordingly Action 2.1.2 recommends a review of the policies/guidelines of the Heritage Areas. This review should focus on the identification and conservation of what is valued in these areas. In addition the City is proposing to conduct landscape character assessments for 'Place Areas' as appropriate as part of the City's Local Area Planning process. Character assessments will identify the landscape qualities of the natural and	No action required.

Response to Submissions of City of Swan Heritage Strategic Plan

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B Dundas (cont)	Upgrade of Heritage List should only occur after other registers and lists are upgraded	<p>built environment that make each place unique and create its sense of place. These assessments may be used to inform decision making in relation to planning within place areas and assessment of development proposals.</p> <p>A Heritage List should not be updated without proper analysis and historic research. As per standard practice the MHI should be used as a base to inform the proposed Heritage List. New provisions have been included in the Strategy to address the need for a review of the MHI and Heritage List.</p>	<p>Inset new Actions 2.1.7, 2.1.8 as follows and 2.1.9:</p> <p>2.1.7 Update the Municipal Heritage Inventory (MHI) in accordance with legislative requirements</p> <p>An MHI essentially provides a cultural and historic record of the local district and should be used to inform the Local Planning Scheme Heritage List and Heritage Areas.</p> <p>2.1.8 Update the Heritage List and Heritage Areas in accordance with legislative requirements</p> <p>A thorough methodology should be prepared to ensure any future review.</p> <ul style="list-style-type: none"> Comprehensively identifies potential places and areas of cultural heritage significance Appropriately lists places as either Heritage Areas or as individual Heritage Listings depending on the nature of significance Has a clear policy on why places have been listed Includes thorough and robust documentation for each place or

Response to Submissions of City of Swan Heritage Strategic Plan

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	It is felt that the document inadequately highlighted the unique historical and cultural heritage significance of the area	The Strategy is not intended to provide a history or analysis of the significance of the area. It is a framework to guide the City in achieving clear and effective heritage management. It is simple and concise in order to encourage a wide understanding and use of the document.	<p>2.1.9 Update the definitions and heritage provisions of the Local Planning Scheme (LPS) as part of any future LPS Review – or on an as needs basis.</p> <p>No action required.</p>
	Immediately set in place mechanisms to identify Guildford as an Historic Area.	Guildford is recognised as a Heritage Area under LPS 17, which enables provisions to be made to conserve and enhance its cultural heritage significance and character. It is the Policy provisions that need to be amended to ensure its character and value is not lost.	
	Where a building is on a Heritage List, the cultural heritage of the entire structure or site needs to be e.g. Cultural/ architectural value of interiors and out buildings	Generally, when a place is individually heritage listed it is the entire lot, which is listed. Although various components within a lot will have different levels of significance and different management options. It is important for the Statement of Significance to be detailed and clear to outlined what is important and should be protected to inform appropriate change (refer to action 1.1.2)	No action required.
	Need to define what significant landscape and vegetation is in the LPPP and objectives to prevent loss. This needs to be incorporated into the Strategy	The City is proposing to conduct landscape character assessments for Place areas as appropriate as part of the City's Local Area Planning process. Character assessments will identify the landscape qualities of the natural and built environment that make each place unique and create its sense of place. These assessments may be used to inform decision making in relation to planning within place areas and assessment of development proposals.	No action required.
B Dundas (cont)	Need to provide an objective documented history to give a basis to the Guildford or other	Action 2.1.2 recommends a thorough review of the <i>Local Planning Policy Guildford Conservation</i>	No action required.

Response to Submissions of City of Swan Heritage Strategic Plan

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The Guildford Association 12 June 2013	Heritage Precincts Significance.	<i>Precinct</i> to ensure it clearly and succinctly articulates to applicants what is important and valued and to ensure pragmatic development criteria are in place to protect the value of the place. As per standard practice the significance of the Precinct should be based on documentary evidence.	
	Heritage Consultancy work should be on a time limited contract. More definitive timeframes need to be devised and an additional column be included with a budget costing.	This is an internal management matter and beyond the scope of the Strategy. Indicative costings are the responsibility of the City and will assist in the implementation of the Strategy. Definitive timeframes may be too restrictive and result in additional layers of administration in the event that tighter tight frames are not met.	No action required.
The Guildford Association (cont)	A column detailing the desirable outcome should be provided.	The objective, strategy and actions provide clear and sufficient guidance on the desired outcome.	No action required.
	The Association supports the appointment of a full time Heritage Officer whose role is linked to a properly funded budget with reporting arrangements to implement the actions.	The Strategy recommends that the City appoint a Heritage Officer or Co-ordinator as a matter of high priority (Action 3.1.1)	No action required.
	The Accompanying Report does not acknowledge that the Local Government is not always the decision maker.	Action 3.2.1 recommends the City Co-ordinate with other government agencies to outline the City's expectations and to establish principles and processes for the development of heritage assets under their care, control and management. This will seek to ensure that all agencies are working towards achieving the City's heritage visions.	Additional information has been added to section 1.5 of the accompanying report to recognise the roles of other decision making authorities active in the City.
	Words like "could" or "should" in this Strategic Plan should be replaced with more definitive words like "will" and "shall".	The Strategy provides a framework for the management of the City's heritage assets. It is not a contract or policy document. The preparation and endorsement of the Strategy provides strong evidence of the City's endeavor to improve its management of its valued heritage.	No action required.
	Additional places and buildings of local streetscape and cultural heritage value in Guildford need to be included on the Heritage List.	The adoption of places on the Heritage List/Heritage Areas will be undertaken as part of the next review. Guidance should to be provided in the Strategy to address the need for future reviews.	Refer to new Action 2.1.7 and associated description and Action 2.1.8.

Response to Submissions of City of Swan Heritage Strategic Plan

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The Guildford Association (cont)		It is important to adopt an approach that recognises that areas of streetscape value are better managed and protected through Heritage Area provisions not on the Heritage List.	
	It would be useful if the City's internal process included a GIS overlay and/or a checklist and that business units are monitored as to use.	The City already has a GIS system in place that identifies places of heritage value and provides a link to an associated Statement of Significance. Action 2.5.2 identifies that a checklist should be prepared for each asset.	No action required.
	The Association does not support the removal of the MHI... it is the only document that indicates that the City has any responsibility for heritage and is better then no document at all.	Action 4.1.1 identifies that a Heritage portal on the City's website needs to be developed as a high priority. The action further recommends, amongst other matters, that the portal should display the City's MHI, Heritage List and Heritage Areas. In the interim the City's website has a section on heritage in its Frequently Asked Questions.	No action required.
	It should be recognised that "heritage" is more than just a building or place and includes cultural landscapes.	The Strategy states 'Heritage is what we inherit from previous generations and recognise as something that we want to pass on to future generations. It can incorporate both the tangible and the intangible.' Further clarification on what is meant by the term heritage is provided on page 2 of the Accompanying Report.	No action required.
	The "Development within a Conservation Precinct Checklist" be reviewed (as an action) to impose greater responsibility on an applicant of the implications of the demolition of a building	<p>The Checklist requires the applicant, amongst other things, to:</p> <ul style="list-style-type: none"> • Provide written documentation which details the heritage and cultural significance of the site/buildings/object/place relevant to the property. • Provide written documentation to justify any non compliance or variations to planning requirements in relation to this application... <p>Alternative wording maybe to required to actively encourage applicants to consider what impact their</p>	<p>Insert new action 2.1.6 as follows:</p> <p>2.1.6 Review the 'Development within a Conservation Precinct Checklist'</p> <p>Investigate the requirements of this Checklist to place more onus on the applicants to demonstrate how their proposal will contribute and respond to the heritage character of the area.</p>

Response to Submissions of City of Swan Heritage Strategic Plan

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		<p>proposal will have on the character of the area. Alternative wording may request an applicant to <i>'provide written documentation as to how the proposal responds to the heritage character of the area and street within it which it is located.'</i></p> <p>Alternatively the City may choose to require the applicant to undertake, in support of the application, a heritage specialist study as allowed by clause 9.2 of LPS 17.</p>	
The Guildford Association (cont)	The City could use legislative provisions to protect heritage similar to those proposed by the Cities of Stirling and Fremantle.	<p>The City of Fremantle and the City of Stirling have proposed an amendment to their Local Planning Schemes to introduce new 'demolition by neglect' clauses into part 7, heritage and conservation protection.</p> <p>The new clauses will give the Local Government the power to issue a written notice on the owner, occupier or other person in control of a heritage listed place or place in a heritage area which is in a state of neglect, and require the repair of the place.</p> <p>The Amendments set out that if the required repairs are not carried out the Local Government may enter the place and undertake the repairs. The scheme amendments include a provision to recover any costs through legal means.</p> <p>An action recommending the investigation of a similar approach to address demolition by neglect through Scheme Provisions has been included.</p>	<p>Insert new action 2.2.2 as follows:</p> <p>2.2.2 Consider introducing Scheme Provisions to combat demolition by neglect.</p> <p>Page 25 of the Accompanying Report has also been amended to address this action.</p>
Helena River Catchment Group 6 June 2013	<p>The natural heritage of the area and the rich indigenous heritage were, not only not fully or properly acknowledged but were unacceptably dismissed.</p> <p>Due to these fundamental omissions and the misleading use of the title of the report, it has made content in the introduction and appendices of the report and its proposals</p>	<p>This Strategic Plan does not apply to the conservation of natural or Aboriginal heritage except in cases where they form part of a place of historic cultural heritage significance or a cultural landscape. This approach is consistent with the State Planning Policy 3.5 - Historic Heritage Conservation.</p> <p>The Strategy could be amended to reflect its</p>	<p>To further address this the following text has been inserted on page 7 of the Strategy:</p> <p>This Heritage Strategic Plan has been prepared to define strategies and actions for the development of projects, policies, procedures, programs and other initiatives that</p>

Response to Submissions of City of Swan Heritage Strategic Plan

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Helena River Catchment Group (cont)	misleading and irresponsible at best.	emphasis on "European" heritage. If such an amendment was required it is recommended that the word 'Historic' be inserted in the title to reflect the terminology used in <i>State Planning Policy 5.3 Historic Heritage Conservation</i> .	will contribute to preserving and enhancing the City's historic heritage..... While this Strategic Plan focuses on historic heritage, in line with State Planning Policy 3.5 Historic Heritage Conservation, it encourages opportunities to develop partnerships with Aboriginal and natural heritage stakeholders to share knowledge and coordinate promotion activities. This approach seeks to ensure a far reaching and inclusive approach to understanding the district's heritage. Include new action 4.5.4 as follows:
	We suggest that this heritage strategic plan needs to be consistent with Australia's Burra Convention and Australia's commitment to the Articles of the UN (2007) Declaration on the Rights of Indigenous Peoples	Opportunities to further understand the Aboriginal association with the area are invited under Action 1.2.2, which states 'an emphasis should be placed on obtaining stories that relate to the themes identified in the existing thematic history.' Aboriginal occupation is one theme in the matrix. Notwithstanding this, opportunities to develop partnerships with the Department of Aboriginal Affairs to share knowledge and for promotion initiatives would be beneficial. Aboriginal heritage is protected by the Aboriginal Heritage Act 1972 and the Department of Aboriginal Affairs not the Local Government.	4.5.4 Collaborate with the Department of Aboriginal Affairs, Swan Indigenous Reference Group, Southwest Aboriginal Land and Sea Council and traditional owner family groups to share information and pass on knowledge.
	The Helena River Catchment Group would instead hope the City's future heritage strategic plan would acknowledge and be more supportive of our voluntary heritage landscape protection works over more than a decade, and more importantly be seeking to more appropriately celebrate Swan's continuing pivotal role as a focal point for National and State natural and cultural heritage.	A new action has been included to improve the recognition of natural heritage.	Amend Action 4.5.2 as follows: 4.5.2 Collaborate with and support the Guildford Association, the Swan Guildford Historical Society, the Helena River Catchment Group and other local groups Continue to ensure that the contribution of such groups to the

Response to Submissions of City of Swan Heritage Strategic Plan

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			care of the City's heritage is acknowledged.