

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.