1. Introduction

1.1 Background

"Heritage supports urban and rural amenity by providing familiarity and the presence of landmarks, by underpinning our 'sense of place', and by enhancing the quality of our built environment generally." (State Planning Policy 3.5; Historic Heritage Conservation (SPP3.5))

Local governments, in close engagement with their communities, perform an important role in the identification and protection of places of cultural heritage significance.

Identifying the heritage values of a place is the first step in the process of heritage management, which aims to respect and retain those qualities and characteristics that contribute to a place's significance. This is followed by the establishment of policies and processes that allow for appropriate consideration and controls.

The deemed provisions of the *Planning and Development (Local Planning Schemes) Regulations 2015* require that local governments establish and maintain a heritage list to identify places that are of cultural heritage significance and worthy of built heritage conservation (s.8(1)). As with all parts of the deemed provisions, this becomes a requirement of each local planning scheme.

Including a place on the heritage list gives the place recognition and protection under the local planning scheme. It requires the local government to give due regard to the heritage significance of the listed place when determining a related development application.

It also means that owners are must submit development applications for proposals that would otherwise be exempt from the requirement for development approval under the deemed provisions. This includes demolition, applications for internal building works, single dwellings, ancillary buildings, and outbuildings and other external structures.

Including a place on the heritage list may also assist in defending a subsequent appeal to the State Administrative Tribunal for a refused development application or a condition of approval imposed on heritage grounds.

Importantly, including a place on a heritage list does not limit or restrict how a local government is to determine an application, or prohibit building works or other development from occurring.

1.2 Purpose of guidelines

These guidelines have been prepared to support local governments in conserving local heritage places through the establishment of heritage lists.

To enable a consistent and transparent framework for the operation and administration of local heritage lists, local governments are encouraged to adopt a local planning policy (LPP) under their local planning scheme. These guidelines provide direction for preparing a LPP for heritage lists, including sample text for a LPP (refer Appendix 1), which local governments may modify and adapt as necessary to suit local circumstances.

1.3 When to use the guidelines

These guidelines are primarily to be used to assist local governments in determining the content of related LPPs for heritage lists, including the discretionary elements of the policy. They also provide supporting information for local governments when considering local heritage management processes and instruments. They may be used to inform decision-makers, assist with training of staff or elected members, and as reference material for ongoing use.

Use of the guidelines will assist local governments in supporting the outcomes and processes identified in SPP3.5.

Many elements of the LPP can be tailored to meet local needs, particularly when establishing thresholds for the inclusion of places in the heritage list. Each local government should ensure that the proposed LPP meets its requirements and is consistent with the local planning scheme, the *Planning and Development Act 2005* and the *Planning and Development (Local Planning Schemes) Regulations 2015.*

2. Relationship between the Heritage List and the Local Heritage Survey

The *Heritage Act 2018* (Heritage Act) requires each local government to identify places of cultural heritage significance in a local heritage survey (LHS) (previously referred to as a municipal or local government inventory). Part 8, section 104 of the Heritage Act states that the purposes of a LHS for a local government include:

- a) identifying and recording places that are, or may become, of cultural heritage significance in its district; and
- b) assisting the local government in making and implementing decisions that are in harmony with cultural heritage values; and
- c) providing a cultural and historical record of places of cultural heritage significance to its district; and
- d) providing an accessible public record of places of cultural heritage significance to its district; and
- e) assisting the local government in preparing its heritage list or list of heritage areas under a local planning scheme.

The LHS is important as a first point of identification of heritage places and is used, among other functions, to inform the preparation of a heritage list. However, the LHS itself has no specific planning or legal weight.

In contrast, the heritage list is an instrument that is afforded powers under the *Planning and Development Act 2005* and therefore carries statutory weight when determining planning outcomes for heritage places.

It is recommended that local governments adopt a LPP for heritage lists before initiating a review of their LHS. This sequence of events allows local government officers and elected members to consider the strategic implications of the LPP in a neutral context. Furthermore, this approach allows local governments to clearly explain to constituents the rationale for, and implications of the policy, without the potential distractions of individual place nominations.

3. The Heritage Framework

A local planning policy for a heritage list will be most effective when integrated with a wider heritage framework that includes an overall strategy for providing assistance and incentives towards heritage conservation, as well as the policy and procedures to ensure good advice and development controls. This recognises that retention and conservation of heritage places provides a community benefit, and that local government acts for the community when aiding owners to deliver this benefit.

Assistance measures, such as specialised services, grants, rates concessions and development incentives, are practical and accessible ways local governments can recognise owner contributions to the conservation of heritage places, and can encourage participation in an optional listing if used.

Further information and assistance in development of a heritage framework is available from the Department of Planning, Lands and Heritage. Resources include:

- Guidelines for assessment of local heritage places (expected Autumn 2021)
- Guidelines for local heritage surveys (July 2019)
- Guidelines and model LPP for identifying and creating heritage areas (expected Autumn 2021)
- Guidelines and model LPP for development of heritage places (expected Autumn 2021)

Appendix 1.SAMPLE TEXT FOR A LOCAL PLANNING POLICY - THE HERITAGE LIST	EXPLANATORY NOTES
Statutory Background This Policy is made pursuant to Schedule 2, Part 2, Division 2 of the <i>Planning</i> <i>and Development (Local Planning Schemes) Regulations, 2015</i> relating to local planning policies. Schedule 2 of the Regulations contains the deemed	Explanatory Notes – Statutory Background These notes do not form part of the policy and are intended to assist the local government in tailoring the policy text to meet its own needs. They may also assist in developing supporting material for heritage matters, but should be removed before
 provisions for local planning schemes (Deemed Provisions). Clause 8 of the Deemed Provisions makes provision for the establishment and maintenance of a heritage list. The heritage list identifies places that are of cultural heritage significance and worthy of built heritage conservation, so that development can, as far as possible, be consistent with the [City/Town/Shire]'s heritage conservation values and objectives. 	The LPP for heritage lists should take the format and approach developed for LPPs by each local government and be adopted and maintained consistent with the local planning scheme.
 The [City/Town/Shire] will not enter a place in the heritage list without first consulting affected owners and occupiers of the place and considering any submissions received on the proposed listing. Inclusion of a place in a heritage list does not limit the ability of a property owner to propose any works or other development, nor does it expect or require the [City/Town/Shire] to determine an application solely on heritage grounds. However, proposals that respect and retain the heritage values of the place are likely to be encouraged and may, where appropriate, be required. 	

Application

This policy applies to the administration and operation of the heritage list established pursuant to clause 8, Schedule 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015* and associated with the local planning scheme.

Note that the heritage provisions of the local planning scheme may be applied to some places that are not included in a heritage list but are considered to have cultural heritage significance.

Objectives

The objectives of the policy are to:

- achieve transparency and consistency in the designation of places on the heritage list
- provide clear guidance on how objections to a proposed inclusion on the heritage list will be assessed
- ensure that the heritage list is maintained in a manner and form that is consistent with the local planning scheme
- provide clear guidance on the criteria for including and excluding a place from the heritage list.

Use of terms

Unless otherwise noted, terms used in this policy have common meanings and include those defined in the *Planning and Development Act 2005*, *Planning and Development (Local Planning Schemes) Regulations 2015*, and the *Heritage Act 2018*.

Explanatory Notes - Application

Clause 13A of the deemed provisions confirms that, for new schemes coming into operation after 15 February 2021, a heritage list established under a former scheme is taken to be the heritage list established under cl.8.

The deemed provisions cl.67(k) require that the local government has due regard to the built heritage conservation of any place that is of cultural significance. While there are no stated restrictions on this, the recommended approach is that heritage provisions are primarily applied to places already identified in a heritage list or heritage area.

Policy	Explanatory Notes – 1. Format of the heritage list
1. Format of the heritage list	The LPS requires that the heritage list is available on the local government website, and if it is reasonably practicable to do
The definitive version of the heritage list is the most recent dated document that has been adopted by a resolution of Council. The heritage list is	so, making a copy available for public inspection at a nominated place.
available on the [City/Town/Shire]'s website and for inspection during business hours at the [City/Town/Shire] offices.	The LPS requires the heritage list to 'set out a description of each place and the reason for its entry in the heritage list'
The heritage list will set out a description of each place and the reason for its entry in the heritage list, and be presented in a format consistent with the template at Schedule 1 of this policy.	(clause 8(2) of the deemed provisions). The content identified in Schedule 1 is considered sufficient to describe the place and identify key heritage values leading to its inclusion in the heritage list.
The place name and location details are considered sufficient to describe each place. A statement of significance drawn from the place's entry in the local heritage survey is considered sufficient to provide the reason for its inclusion in the heritage list.	It is open to the local government in forming its policy to determine alternative means of meeting the requirements of the deemed provisions.
Further information on each place will be maintained in the Heritage Council's online database <i>inHerit</i> (<u>www.inherit.stateheritage.wa.gov.au</u>). If there is any inconsistency between sources, the [City/Town/Shire]'s hard copy of the heritage list shall be determined the correct version. The inclusion of a link to the inHerit entry for each place should be included in electronic versions of the heritage list.	The Heritage Council's online database, <i>inHerit</i> , provides a centralised resource that enables local governments to manage and publish both their LHS and heritage list. An <i>inHerit</i> entry can be used to note whether a place is included in the heritage list and provides all data that has been entered for the place.

Level of significance to local area	Category	Description	Heritage list	Each local government should determine the threshold of significance that will be applied when considering whether a place should be included in the heritage list. All places in the
Exceptional significance	1	Essential to the heritage of the locality. Rare or outstanding example.	All places included in heritage list.	LHS have been assessed as having cultural heritage significance. The further threshold for inclusion in the heritage list is whether the place is 'worthy of built heritage
Considerable significance	2	Very important to the heritage of the locality.	All places included in heritage list.	conservation', also referred to here as simply 'conservation'. As a minimum, it is recommended that all places in the State Register, and those identified in the LHS as having
Some / Moderate significance	3	Contributes to the heritage of the locality.	Places may be included in the heritage list	'Exceptional' or 'Considerable' (Category 1 and 2) significance for the local area should be considered worthy of conservation and therefore warrant inclusion in the heritage list.
Little significance	4	Has elements or values worth noting for historical interest but otherwise makes little contribution.	Below the threshold for the heritage list.	Places in Category 3 often make up most of the entries in a LHS, but local governments may hold different views as to whether they should be included in the heritage list. The model LPP gives the option that determination as to whether these places are worthy of conservation is made in
Establishment ar	nd maintena	nd inclusion in the heritage	a requirement of the	consultation with the owner. This recognises that the objective of conservation of these places will be more readily achieved when actively supported by the owner.
<i>Planning</i> Schem based on an ass	e) Regulation essment of c	I in the <i>Planning and Dev</i> <i>ns 2015</i> . Inclusion in the cultural heritage significan s to whether it is worthy o	heritage list will be ce of a place and the	This mechanism allows the local government to determine the weight they give to the owner's views, potentially allowing those owners in Category 3 who do not agree that their property is worthy of conservation to have a greater influence on the local government's own opinion.
The designation of cultural heritage significance for local heritage places will be taken from the [City/Town/Shire]'s local heritage survey (LHS). The assessment and designation of significance will be carried out in line with the <i>Guidelines for Local Heritage Surveys</i> (Heritage Council of Western Australia, July 2019).			It would also be a valid option for Category 3 places to be established by default as worthy of conservation, as with Category 1 and 2, or not, as with Category 4.	

Explanatory Notes – 2. Threshold for inclusion

Threshold for inclusion in the heritage list.

2.

A place may be considered worthy of built heritage conservation irrespective of its current state of repair; ongoing requirements for conservation, care and maintenance; or economic worth.	Note that, in all cases, while the owner's submissions should be taken into account, the local government must still independently determine whether the place is of cultural heritage significance and worthy of conservation.
 The [City/Town/Shire] is of the opinion that all places included in the State Register of Heritage Places have cultural heritage significance and are worthy of built heritage conservation, and will be added to the heritage list. The [City/Town/Shire] is of the opinion that all places designated as having 'exceptional' or 'considerable' significance to the local area (Category 1 or 2) are worthy of built heritage conservation and should in all cases be included in the heritage list. The [City/Town/Shire]'s opinion as to whether places designated as having 'some/moderate' significance (Category 3) are worthy of built heritage conservation will be formed in consultation with the property owner. Places designated as having little significance to the local area are not considered to be worthy of built heritage conservation and will not be included in the heritage list. A place that is not individually considered to be worthy of built heritage conservation may still be included in a heritage area adopted under the local planning scheme. 	 Places included in the LHS as Category 4 would commonly be considered 'below threshold' and not included in the heritage list. These are places of little significance that are worthy of noting for reference, or for community interest, but do not need to be monitored and controlled through the planning framework. They may be sites of earlier buildings, places of some local interest, or places that are otherwise useful to note but not retain. Information on these places is still of value and data in the LHS may inform other heritage initiatives such as heritage trails, creation of heritage areas, research projects into local histories, and educational activities. It is worth noting that an historic site may have a high level of significance and should not always be assumed to be a Category 4 place. The significance may relate to identified or potential archaeology, a high level of historic or social significance, or other factors that do not rely on the presence of physical remains. It is important to note that identification of a heritage area is a separate process, and the inclusion or exclusion of an individual place in the heritage area.

3. Changes to the heritage list

3.1 Consultation

Consultation on changes to the heritage list, including addition, variation or removal of any entry, will meet or exceed the minimum requirements of the local planning scheme.

Consultation in relation to specific actions is identified in the relevant section of this policy.

The [City/Town/Shire] will give written notification of any changes to the heritage list to the Heritage Council of Western Australia and the affected owner and occupier.

3.2 Entry of a place in the heritage list

The LHS prepared by the [City/Town/Shire] will be used as the basis for establishing cultural heritage significance for each place. Accordingly, requests for the assessment of heritage values of a place shall be processed as a nomination for the LHS. The request should provide a sufficient description to enable accurate identification of the place, and give reasons why the nominee believes the place is of cultural heritage significance.

If a place is adopted in the LHS by resolution of Council and its assigned level of significance meets the threshold for possible inclusion in the heritage list as defined in Table 1, and the [City/Town/Shire] considers that the place is worthy of conservation, the [City/Town/Shire] will begin the consultation process to consider inclusion of the place in the heritage list.

Explanatory Notes – 3.1 Consultation

Minimum consultation requirements for modifying the heritage list are set out in clause 8(3) of the deemed provisions and include notification to each owner and occupier, and a minimum 21 days submission period. The consultation requirements in the policy may be varied as needed to meet local conditions, but should not be less than the minimum.

The policy should note any group or body (such as a local history society or heritage advisory group), that will be included in the consultation process.

The preferred method of notification is in writing, submitted to <u>HCWAreferrals@dplh.wa.gov.au</u>, The local government is also encouraged to update the relevant entries in the inHerit database.

Explanatory Notes - 3.2 Entry of a place in the heritage list

The trigger for considering inclusion of a place on a heritage list will generally be a decision on its level of cultural heritage significance, usually associated with adoption or review of a LHS. It is therefore recommended that nominations of a heritage place are invited only in relation to assessment for inclusion in the LHS. If separate information, guidelines or forms are available for nominating a place to the LHS, this should be referenced in the LPP.

Assessment of cultural heritage significance is a substantial exercise that is usually undertaken during the drafting and adoption of a LHS. Development of a heritage list should not generally require a separate exercise to determine significance as the LHS will already contain this information.

An objection to the level of cultural heritage significance identified for a place should be accompanied by supporting material to clearly articulate any errors or omissions in the assessment documentation that may indicate why a different conclusion on the significance of the place should be reached.	Some local governments, however, have identified that they prefer to undertake additional assessment of places proposed for the heritage list. This is a matter for each local government to consider and determine based on its individual needs and resources.
	Where the local government has any doubt about the validity, currency or completeness of information used to establish the LHS, consideration of a place for inclusion in the heritage list should include a full review of this data.
	An underlying principle is that inclusion in the heritage list should be derived from the assessment of significance, both directly in identifying the cultural heritage significance of the place, and indirectly in defining whether it has been designated within a category that the local government considers worthy of conservation.
3.3 Modifying an entry in the heritage list	Explanatory Notes – 3.3 Modifying an entry in the heritage list
Changes to an entry in the heritage list may be initiated by the [City/Town/Shire] as part of the administration of the list, or by nomination using the form in Schedule 2 of this policy. The [City/Town/Shire] will consider all requests for change, but is not obliged to make such a change. A decision on progressing the change will take into account the relevance, necessity and benefits of updated information and the administrative	Proposals for changes to the heritage list can result from new research (for example, undertaken during a LHS review), completion of approved development works, or updated information from the owner, community or other source. In some cases this will result in a re-assessment of the heritage values of a place, with the potential for this to be reflected in the heritage list entry for the place.
requirements of the consultation process. In general, minor and inconsequential changes to the heritage list will not be progressed immediately, but may be deferred for later consideration as part of a broader update.	Regardless of the extent or type of proposed change to the heritage list, each owner and occupier must be given written notice and allowed a period of at least 21 days to make a submission. The policy therefore notes that requests for change will be considered on an individual basis with discretion exercised as to whether, and when, the change is progressed.

3.4 Removing an entry from the heritage list Removal of a place from the heritage list may be appropriate where the [City/Town/Shire] considers that the cultural heritage significance of a place has substantially changed, to the extent that it no longer displays the values for which it was included in the heritage list and/or is no longer considered worthy of built heritage conservation. This may be the result of substantial demolition of, or damage to, a place, or presentation of new evidence about the place.	The form in Schedule 2 may be revised and adapted as needed, or deleted if a standard form is not required. <i>Explanatory Notes – 3.4 Removing an entry in the heritage list</i> As with objections to inclusion in the heritage list, requests to remove a place should be based primarily on consideration of its cultural heritage significance, but also take into account whether the place is still considered worthy of conservation.
A proposal to remove a place may be made by the [City/Town/Shire]'s Council or its officers, or by the owner or occupier of a place. If proposed by an owner or occupier, the onus will be on them to demonstrate that the cultural heritage significance of the place and/or the extent to which it is	A proposal to remove an entry would also be a change to the heritage list and therefore triggers the need for consultation as specified in clause 8(3) of the deemed provisions.
considered worthy of built heritage conservation is below the threshold for inclusion in the heritage list.	While the minimum requirement for consultation is an invitation to each owner and occupier to make a submission,
In addition to consultation with owners and occupiers for each place for which removal is requested, consultation on such an action may be carried out by inviting comment: • from the general community through the [City/Town/Shire] website	wider consultation is considered appropriate and is recommended for the proposed removal of a place. This reflects the consultation process for determining significance for initial adoption in the LHS.
 from the local historical society as part of a community forum or workshop held for that purpose or in any other manner that may reasonably result in providing relevant information on the cultural heritage values of the place. 	The policy can also note grounds it considers reasonable for removal of a place from the heritage list. In general, it would not be sufficient to argue for removal simply because of economic factors or to allow demolition. If the Council wishes to support the demolition of a heritage place, it can do so, but
The [City/Town/Shire]'s opinion as to the cultural heritage significance of a place is determined solely by a resolution of Council at a properly convened meeting.	should acknowledge that it is placing other priorities ahead of conservation outcomes.
Substantial development, demolition or loss of fabric will not automatically result in removal from the heritage list, as the place may still retain sufficient cultural heritage significance to support inclusion in the heritage list, particularly if the heritage values relate to social or historical significance.	A record of places removed from the heritage list could form part of the Local Heritage Survey, or form a separate table within the heritage list document. This information may also be retained within the inHerit database.

The [City/Town/Shire] will retain a record of all places removed from the heritage list.	Explanatory Notes – 4. Specifying an interior as not of cultural heritage significance
4. Specifying an interior as not of cultural heritage significanceDevelopment approval for internal building works to a place on the heritage list is required unless the place is designated in the heritage list as having 'an interior that is not of cultural heritage significance'.	Clause 61 of the deemed provisions allows internal building work to be carried out without development approval where the work relates to a place identified in the heritage list only if the heritage lists specifies that the interior is not of cultural heritage significance.
The determination as to whether any interior is of cultural heritage significance will be based on the assessment of significance associated with the place, and will be noted as part of the entry of the place in the heritage list. The entry will describe which interior elements or objects, if any, have been assessed as contributing to the cultural heritage significance of the place, and will therefore be considered when determining proposals relating to the place. However, the absence of such description should not be taken as specification that the interior is not of cultural heritage significance.	Designation that an interior is not of cultural heritage significance should be clear and unambiguous and is best achieved by notation in a specified field in the heritage list. Note that it is not sufficient simply to adopt a general policy or approach that all places, or a selection of places, on the heritage list are considered not to have significant interiors. The deemed provisions require that the designation is specified in the heritage list itself.
 Where an assessment of the interior of a place has been prevented through refusal of access, or other action or inaction by or on behalf of the property owner, an application for development approval for interior building work may require the applicant to provide a heritage assessment from a competent heritage professional. Such an assessment will be required only where there there are reasonable grounds to consider that the interior may be of cultural heritage significance. Adding the designation that <i>'the interior is not of cultural heritage significance'</i> constitutes a modification to the place's entry in the heritage list and must therefore follow the consultation process set out in this policy. 	The Heritage Council's <i>inHerit</i> online database provides a simple option for this designation – when noting a place as being included in the heritage list, it can be associated with a status of 'Interior not of cultural heritage significance'. The sample text notes that, where the owner has blocked access to survey an interior, they may be required to commission and submit their own heritage survey with a development application. This is consistent with clause 11 of the deemed provisions and notes that, while the local government should make every effort to undertake a heritage assessment, it is reasonable to require that this is provided by the owner in circumstances where the local government is prevented from completing a full assessment.

Schedule 1. Heritage List Template

Place number	Place name	Address	Location	Significant interior	Statement of significance	Further information
00000	Text	Street No, Name	Suburb	Y / N If Y, detail	Text	Hyperlink to inHerit record

Definitions:

Place number:	Unique reference number assigned by the Heritage Council.
Place name:	Identifier based on primary use or other designation, as used in the Local Heritage Survey.
Address:	Registered property address or other land information as determined by Landgate. For precincts
	list boundary roads or other descriptive text.
Location:	Suburb, plus any additional information required to determine location.
Significant interior:	Indicates whether place has been assessed as having an interior with cultural heritage significance. If 'Y', interior elements or objects must be described here. Note that a 'N' or 'No' must be entered for the interior to be designated as 'not of cultural heritage significance'.
Statement of significance:	Reason(s) for inclusion in the heritage list. Statement of significance as identified in the Local Heritage Survey, or a summary if extensive.

Schedule 2. Heritage List change request form

This form may be used to request a change to the entry of a place already on the heritage list, or to nominate a place for inclusion in the heritage list, where it is already included in the local heritage survey. To nominate a place for inclusion in the local heritage survey please use the form [LHS Nomination] / contact the [City/Town/Shire].

Section 1 - Details of nominee

1. Your details*

Name	
Address	
Phone	
Email	
41.1	l-t

*this section is mandatory

- 2. Please indicate your preferred method of contact
 - \Box Phone \Box Email
- 3. Please indicate your association with the heritage listed place
 - □ Owner
 - □ Occupier (tenant, or user of building)
 - \Box Other (please state)

Section 2 – Place information

1. Subject property information*

Place information should be taken from the entry in the heritage list or local heritage survey. If not stated, the Heritage Council WA (HCWA) Place no. can be found via the inHerit database. <u>http://inherit.stateheritage.wa.gov.au/public</u>

Place no. (HCWA)	
Place name	
Address	

*this section is mandatory

2. Please indicate the purpose of the heritage list change request.

- □ Proposal for entry of a place in the heritage list (Please complete section 4)
- □ Proposal to modify heritage list entry information (Please complete section 5)
- □ Proposal to remove a place from the heritage list (Please complete section 6)

Section 4 – Proposal for entry of a place in the heritage list

A place may be considered for inclusion on the heritage list where [City/Town/Shire] considers that the cultural heritage significance of the place and/or the extent to which it is considered worthy of built heritage conservation is above the threshold for inclusion in the heritage list.

1. Please provide reasons why you believe this to be true for the nominated place with any supporting evidence. Include details such as new evidence about the place.

Provide details here

Section 5 – Proposal to modify heritage list entry information

1. Please indicate why modifications are requested.

- Inaccurate or incomplete information represented in the heritage list
 Provide details here
- New evidence about the place (provide historical source information below)
 Provide details here
- □ Other

Provide details here

2. Please fill the below relevant fields with the proposed information to be changed.

Field	Proposed heritage list data
Place no. (HCWA)	(if incorrect only)
Place name	
Address (Street no.)	
Location (Suburb)	
Significant interior (Y/N)	
Additional details	
Statement of significance	
Further information	
(optional)	

Section 6 – Proposal to remove a place from the heritage list

Removal of a place from the heritage list may be appropriate where the [City/Town/Shire] considers that the cultural heritage significance of a place has substantially changed, to the extent that it no longer displays the values for which it was included in the heritage list and/or is no longer considered worthy of built heritage conservation.

1. Please provide reasons why you believe this to be true for the nominated place with any supporting evidence. Include details regarding any physical changes to the place, or new evidence about the place.

Provide details here