



Additional documents

Ordinary Meeting of Council

Wednesday 25 May 2022 6pm



Table of Contents

PC2022-2 SOUTH TERRACE, NO. 2/284 (LOT 22) SOUTH FREMANTLE –
SECTION 31 STATE ADMINISTRATIVE TRIBUNAL
RECONSIDERATION FOR CHANGE OF USE FROM OFFICE TO
SHOP AND UNAUTHORISED SIGNAGE (JL DA0405/21) 2

C2205-1 SECTION 31 RECONSIDERATION - BRACKS STREET, NO. 90
(LOTS 241-260), NORTH FREMANTLE – DEMOLITION OF
EXISTING BUILDINGS AND STRUCTURES - (CS/CJ DA0440/21) 3

C2205-1 SECTION 31 RECONSIDERATION - BRACKS STREET, NO. 90
(LOTS 241-260), NORTH FREMANTLE – DEMOLITION OF
EXISTING BUILDINGS AND STRUCTURES - (CS/CJ DA0440/21)
.....12

C2205-1 SECTION 31 RECONSIDERATION - BRACKS STREET, NO. 90
(LOTS 241-260), NORTH FREMANTLE – DEMOLITION OF
EXISTING BUILDINGS AND STRUCTURES - (CS/CJ DA0440/21)
.....13



**PC2022-2 SOUTH TERRACE, NO. 2/284 (LOT 22) SOUTH
FREMANTLE – SECTION 31 STATE ADMINISTRATIVE
TRIBUNAL RECONSIDERATION FOR CHANGE OF USE
FROM OFFICE TO SHOP AND UNAUTHORISED SIGNAGE
(JL DA0405/21)**

Proposed amendment submitted by Cr Rachel Pemberton

Add an additional advice note, to read as follows:

- iii. This approval relates to a Shop (massage). The applicant is advised that reports of illegal activity on the premises will be referred to the police for investigation.**



**C2205-1 SECTION 31 RECONSIDERATION - BRACKS STREET, NO.
90 (LOTS 241-260), NORTH FREMANTLE – DEMOLITION
OF EXISTING BUILDINGS AND STRUCTURES - (CS/CJ
DA0440/21)**

Additional officer information

The following independent heritage advice has been provided as late additional information.

**Additional documents - Ordinary Meeting of Council
25 May 2022**



KLA Project No: 2022-007

24 May 2022

Shire of Fremantle
151 High Street
Fremantle WA 6160

Attn: Chloe Johnston – Manager Development Approvals

Dear Chloe,

Subject: 90 Bracks Street in North Fremantle Precinct – Independent Heritage Advice

Brief for Review

The initial advice provided by the City's heritage team recommended supporting the demolition of these buildings on the condition that an archival record was prepared to City standards. However, contrary to officer advice, the Council decided to protect the historic industrial character of the area and has resolved not to support the entire demolition of these buildings unless some of the more significant built elements are retained, and some roof trusses are retained and stored for future use as part of any new development on site. An application to review the decision has now been submitted to SAT by the applicant.

The applicant has commissioned at least three heritage architect's to provide heritage assessments of the place, and all have concluded that the buildings have little or no heritage significance and are not worthy of full or partial retention.

The City is now seeking a heritage architect to:

- review the heritage assessments prepared by the City officer and independent consultants and develop a case to support the Council's position that the place has some significance in the context of Fremantle and the North Fremantle Heritage Area.
- to attend SAT tribunal as an expert witness on behalf of the City (scheduled for the 19 and 20 July)

Note that this is a desktop review of the documentation in relation to the place and a site investigation has not been undertaken at this point.

Conservation Principles

The Australia ICOMOS (International Council on Monuments and Sites) – The Burra Charter 2013

Article 15. Change¹

15.3 Demolition of significant *fabric* of a *place* is generally not acceptable. However, in some cases minor demolition may be appropriate as part of *conservation*. Removed significant fabric should be reinstated when circumstances permit.

¹ This report quotes from The Burra Charter (2013). Australia ICOMOS from time to time reviews and makes amendments to the exact wording of the definitions, policies and the associated notes and guidelines. All current documents can be accessed at the Australia ICOMOS website (<http://australia.icomos.org/>).

Street Address
96 Beach Road
Bunbury WA 6230

Postal Address
PO Box 793
Bunbury WA 6231

Telephone (08) 9791 5404
Email klyon@kentlyon.com.au

Additional documents - Ordinary Meeting of Council 25 May 2022

15.4 The contributions of all aspects of *cultural significance* of a *place* should be respected. If a place includes *fabric, uses, associations or meanings* of different periods, or different aspects of cultural significance, emphasising or interpreting one period or aspect at the expense of another can only be justified when what is left out, removed or diminished is of slight cultural significance and that which is emphasised or interpreted is of much greater cultural significance.

Reversible changes should be considered temporary. Non-reversible change should only be used as a last resort and should not prevent future conservation action.

Review of Legislation and Planning Policies

Heritage Act 2018

Heritage Act 2018 section 5(1):

cultural heritage significance means aesthetic, historic, scientific, social or spiritual value for individuals or groups within Western Australia.

Heritage Act 2018 section 4(1):

conservation, in relation to a place of cultural heritage significance, means the conservation of the place so as to retain its cultural heritage significance, including –

- (a) maintenance, preservation, restoration, reconstruction, adaptation and interpretation of the place; and
- (b) retention of the associations and meanings of the place; and
- (c) retention or reintroduction of a use of the place;

Heritage Act 2018 section 4(1)(c):

public authority means any of the following –

- (c) a local government or regional local government;

Western Australian Planning Commission – State Planning Policy 3.5 Historic Heritage Conservation, 29 May 2007 – PC0902-35 document adoption/approval and 23 March 2022 – PC2203-11 latest document amendment details

The document is a State Planning Policy made under part 3 of the *Planning and Development Act 2005*. The policy applies throughout Western Australia.

The objectives are in the policy:

- To conserve places and areas of historic heritage significance.
- To ensure that development does not adversely affect the significance of heritage places and areas.
- To ensure that heritage significance at both the State and local levels is given due weight in planning decision-making.
- To provide improved certainty to landowners and the community about the planning processes for heritage identification, conservation and protection.

Relevant to this application is section 6.2 Designation of heritage areas “...the local government is required to adopt a local planning policy that sets out the objectives and guidelines for conserving the significant heritage fabric of the area.” The City of Fremantle has the Local Planning Policy 3.6 Heritage Areas.

Under section 6.6 Development control principles, there are specific principle listed under ‘Development of the heritage place (including a place within a heritage area)’:

- Demolition approval should not be expected simply because redevelopment is a more attractive economic proposition, or because a building has been neglected. Consideration of a demolition proposal should be based upon the significance of the building or place; the feasibility of restoring or adapting it, or incorporating it into new development; the extent to which the community would benefit from the proposed redevelopment; and any local planning policies relating to the demolition of heritage places.



Additional documents - Ordinary Meeting of Council 25 May 2022

City of Fremantle – Local Planning Policy 1.6 Heritage Assessment and Protection, 25 February 2009 – PC0902-35 document adoption/approval and 23 March 2022 – PC2203-11 latest document amendment details

The statutory background lays out that the Local Planning Policy is prepared under Schedule 2 Deemed Provisions of the *Planning and Development (Local Planning Schemes) Regulations 2015*. In particular:

“Clause 11 of the Deemed Provisions prescribes that the Council may require a Heritage Assessment to be carried out prior to the approval of any development proposed in a Heritage Area or in respect of a heritage place listed on the Heritage List. Clause 12 allows Council to vary site or development requires to facilitate the built heritage conservation.

Part 9, Clause 67 of the Deemed Provisions prescribes the matters to which the Council is required to afford due regard in considering a development proposal. Included amongst these matters are any potential impacts that a proposal may have on the heritage values of an existing place and its context including the streetscape and/or heritage area.”

Section 3. Types & Categories of Listing relevant to this application are under the Heritage Areas and are noted as:

“Heritage Areas are precincts where special planning control is needed to conserve and enhance the significance of the area. Additional planning controls apply to places within a Heritage Area.

Places within Heritage Areas can be defined as either ‘contributory’ or ‘non-contributory’. Contributory places will generally include places on the Heritage List but may also include places which are not individually listed. Where mapping of contributory places has not been undertaken for a heritage area, or is incomplete, this will be assessed upon application.”

Under section 5. Heritage Assessments and Impact Statements identify when these two different documents are required for Demolition Applications – “Is mapped as a ‘contributory’ place within a Heritage Area.” There have been three Heritage Impact reports compiled for this application.

City of Fremantle – Local Planning Policy 3.6 Heritage Areas, 23 March 2022 – PC2203-11 document adoption/approval

The purpose is noted as:

1. Define the statement of significance for each heritage area.
2. Outline the general assessment criteria for development proposals for properties subject to heritage area protection, and their relationship with more detailed area-specific policies and plans applicable to individual heritage areas.

Two of the objectives of the policy are to ensure that:

- Development within heritage areas responds to the specific characteristics of an individual heritage area as outlined in the area’s statement of significance.
- Existing places and fabric located in Heritage Areas which are, or may become, of cultural heritage significance are protected until such time as mapping of Contributory Places has been completed and any significant fabric added to the Heritage Area mapping and/or the Local Heritage Survey, or as otherwise determined by Council upon planning application.

This policy should be read in conjunction with Local Planning Policy 1.6, which outlines the City’s broad approach to heritage assessment and protection, and other area and issue-specific policies.

1. Heritage Areas and Statements of Significance

Additional documents - Ordinary Meeting of Council 25 May 2022

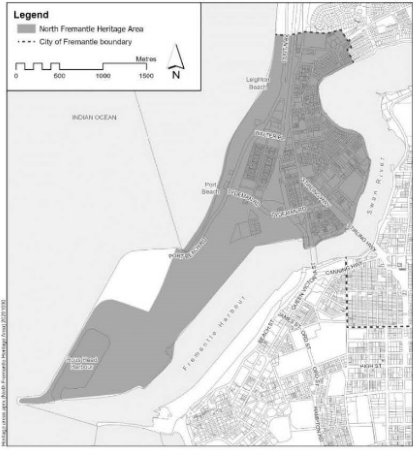


90 Bracks Street in North Fremantle – Independent Heritage Advice

4

Schedule 1: Heritage Areas and Statements of Significance



North Fremantle Heritage Area	
	Statement of Significance North Fremantle is significant as an area located to the north of the Swan River and the Port of Fremantle with a history of settlement dating back to the Pensioner Guards in the mid nineteenth century. The area is significant for: • Its connection with the Pensioner Guards whose former Barracks was located in the area and Captain J. Bruce, commanding officer of the pensioner guards who was granted 150 acres in the area. Allotments were surveyed and allocated to the pensioner guards, who accompanied the convicts; • its unique topography located between the river and the ocean which contributes to its unique character; • its role in World War II defences with the establishment of the Leighton Battery; • its concentration of mainly modest workers accommodation dating from the Federation and Inter-War periods; • its focus on the industries relating to the Port of Fremantle, the railways and associated industries established in the area;

52/66

Schedule 1: Heritage Areas and Statements of Significance



	• its former industrial character resulting from the former Leighton Marshalling Yards industries such as the Dingo Flour Mill located in the area; • its cultural diversity resulting from successive periods of migrant settlement in the area; and • With the impact of the goldrushes in the 1890s and 1900s, in particular the huge growth in population and the increase in prosperity, North Fremantle began to develop as a residential area. Since the first decades of the twentieth century, North Fremantle has functioned as a mixed residential and medium to light industrial area and the area retains some of that mix today.
Area Specific Development Guidance: Deemed to Comply Street Setbacks to residential development in a Residential zone: as per the Residential Streetscape Policy except where subject to a precinct-specific policy or guidelines Also Refer: • Thompson Road, Craig Street and Lime Street Development Guidelines Local Planning Policy • Minim Cove North Fremantle Local Planning Policy • Northbank Development Guidelines DGN6 • Rocky Bay Estate DGN10 • Cypress Hill DGN11	

53/66

2. Contributory

The definition of 'Contributory places' may include places which are not individually heritage listed. These "...may include representative examples of a place type, period or style, places which contribute to the streetscape; and/or one which combines with other related places to demonstrate the historic development of a heritage area."



Additional documents - Ordinary Meeting of Council 25 May 2022

Furthermore, it states:

“Where mapping of contributory places has not been undertaken for a Heritage Area, or has not been completed due to the inaccessibility of the site or the inability to fully reveal the existence of potentially fabric of cultural significance, this will be assessed upon planning application.”

3. Development Assessment

Key ‘Aims and Outcomes’ of relevance to this application are:

“3. Retain or reflect and allow an understanding of the traditional land uses and evolution of the place and / or area”

“...In larger and more diverse heritage areas, in particular, this requires site-specific consideration with higher degrees of restriction applicable in more significant and intact parts.”

The whole of section 3.4 Demolition (applicable to contributory places only) should be considered relevant to the application as there is no proposal for redevelopment. Therefore section 3.4.1 Intent states:

“Demolition is a permanent change that cannot be reversed: even removal of places with lower levels of individual heritage significance can cumulatively undermine the significance of a heritage area.

Demolition of any building or structure on any site located in a Heritage Area requires development approval under the Local Planning Scheme.

In considering a proposal for demolition on any site in a Heritage Area where the mapping of Contributory Places has not been completed and/or is incomplete, the Council shall determine whether any fabric located thereon qualifies as a Contributory Place and applications will be assessed against Clause 4.14 of Local Planning Scheme No. 4 with the following providing additional guidance.”

Heritage Assessment Documentation Received and Reviewed

Demolition of Industrial Structures, Port Beach Road, Bracks and Irene Streets, North Fremantle – Heritage Impact by Phillip Griffiths of Griffiths Architects, 7 October 2021

Heritage Policy

In its listing, the City states:

Within the boundaries of the North Fremantle Precinct, which has been included on the City of Fremantle's Municipal Heritage Inventory, any proposed development must be carried out in accordance with the heritage conservation policies adopted for the precinct.

These include:

Demolition Control: All extant buildings and structures located in the precinct and identified on the MI or on any other heritage register should not be demolished. They should be conserved in accordance with the principles of the Burra Charter (The Australia ICOMOS for the conservation of places of cultural significance).

A copy of the 2015 report entitled North Fremantle Industrial Sites, Site History by Griffiths Architects with Eddie Marcus, historian, was referenced and is discussed separately below. The history relates to a larger portion of land than the demolition application. However, it captures the overall importance of the elements within the place.

The conclusion is:

“On the information available, removal of all improvements on the subject land would have no impact on heritage values and would allow a more fitting development to take place, consistent with the ongoing planning for the broader precinct to provide an Urban redevelopment response in proximity to the North Fremantle Train Station.”

However, there is no mention of a loss of opportunity in demolishing all improvements on the subject land for future development that may benefit from the conservation of the buildings recommended for retention.

Additional documents - Ordinary Meeting of Council 25 May 2022

Heritage Impact Assessment – Demolition of Place by Catherine Sullivan of City of Fremantle, 26 November 2021

Heritage Area

90 Bracks Street is part of North Fremantle Precinct which was designated as a Heritage Area in accordance with clauses 7.2.1 and 7.2.9 of Local Planning Scheme No. 4.

Under the Statement of Significance, the table identifies two points that indicate 'Minor impact'; the City states:

- its focus on the industries relating to the Port of Fremantle, the railways and associated industries established in the area;
- its former industrial character resulting from the former Leighton Marshalling Yards, State Engineering Workshops and other industries such as the Dingo Flour Mill, the Ford Motor Factory etc.;

Under the Heritage values, the table identifies two values that indicate 'Minor impact'; the City states:

- Historic value
- Social value

While under the Heritage Comments notes, "Demolition of any place requires careful consideration because removes all of its heritage significance except for intangible historical and social values that are not dependent on physical fabric."

The record photographs show how gables to *Massey Harris & Co Ltd pre-1936* building to the streetscape along Walter Place is dominated and is a unique reference to the industrial nature of the site. Likewise, the *J Gadsden Building 1937-1939* façade onto the north side of the former Vaughn Street road reserve refers to the area's early industrial types of building.

Bracks Street Heritage Comment by Gemma Dewar of Hocking Heritage + Architecture, 12 February 2022

States that none of the buildings within the site area is listed in the City's Local Heritage Survey prepared under the Heritage Act 2018 or the Heritage List adopted under the City's Planning Scheme. However, doesn't make mention of the North Fremantle Heritage Area.

Under section 6. Impacts of Demolition on Heritage Values they have stated that "To be considered a heritage place, a place must be entered on a heritage list or be considered to make a positive contribution to the significance of a heritage area." However, this does not take into account the statement of significance for the North Fremantle Heritage Area, which notes "its focus on industries relating to the Port of Fremantle, the railways and associated industries established in the area; former industrial character resulting from the former Leighton Marshalling Yards and industries such as the Dingo Flour Mill located in the area;". The site is adjacent to the Leighton Beach Marshalling Yards (Place 13469), and one of the industrial buildings has been in existence since pre-1935.

The conclusion's second and third points are counter to section 6. Impacts of Demolition on Heritage Values where the streetscape along Walter Place and former Vaughn Street road reserve have significant buildings relating to the history and development of the area.

Heritage Impact Assessment – 90 Bracks Street, North Fremantle by Flavia Kiperman of element, 19 February 2022

The Chronology and Brief history in section 2 Documentary Evidence outline how Massey-Harris Co Ltd established an assembly plant on the subject site back in 1914 "...adding to the essentially industrial character of this part of North Fremantle." The British Imperial Oil Co established an office north of former Vaughan Street in 1928. In 1929, Massey-Harris Co Ltd built new assembling shops and offices on the site. In 1939, the new buildings for J. Gadsden Pty Ltd were constructed for cans, bedding, plastic, and canvas manufacturers.



The newspaper article also referred to the unsuitability for residences in 1928 in North Fremantle with a mix of housing, factories and oil stores with a description of a 'drab neighbourhood'. This attests to the importance of the social and heritage values to the area for a way of life.

The Physical description section "...is extracted from the City of Fremantle Heritage Impact Assessment (26/11/2021), updated following the site visit and further research conducted by element." The photos section notes that the site visit occurred on 15 February 2022. The site is outlined from Bracks and Irene Streets, Railway Yard and Walter Place frontages. The Bracks Street & Walter Place descriptions pick up some critical aspects that the City wishes to be retained.

Section 3 Heritage Impact Statement raises acknowledges the minor impact on the two points in the Statement of Significance for the North Fremantle Precinct:

- its focus on the industries relating to the Port of Fremantle, the railways and associated industries established in the area;
- its former industrial character resulting from the former Leighton Marshalling Yards and industries such as the Dingo Flour Mill located in the area;

The conclusion's first paragraph notes that "...the industrial buildings located at the corner of Bracks Street and Walter Place have little historical significance..." they have stated there is no historical significance. Furthermore, the second paragraph notes that "There are aspects of these buildings that could potentially be valued by the community, such as the spatial qualities of the warehouse interior, the timber trusses, and the brick detailing of the original entry", when referring to (*J Gadsden Building 1937-1939*). The third paragraph states that restoration is nearly impossible because the remnant building fabric is extensively contaminated. However, if buildings are not demolished, they may benefit from developing techniques to remove contaminants in the future.

The final dot point is a desirable recommendation that could be more effectively achieved without the demolition of the buildings requested for retention:

- Design of new development should interpret site specific stories and the industrial character of the site.

North Fremantle Industrial Sites – Site History by Phillip Griffiths of Griffiths Architects, November 2015

The history of the Arrival of Industry section notes that:

- "Following World War I there was an increasing concentration of industry to the west of the railways line." In relation to the area north of Irene Street on Bracks Street.
- "In 1923, Broome Street was renamed Bracks Street after the former (and future) Mayor of North Fremantle." The western boundary of the site.

The Impact on the Residents section quotes a journalist's claims from 1928 in recollection of the "other noisy galvanised iron monsters of industry and commerce", demonstrating the essentially industrial character of this part of North Fremantle. Where it is described as a 'drab neighbourhood'.

Figure 4: Bracks St Aerial View shows that the two buildings (*Massey Harris & Co Ltd pre-1936*) and (*J Gadsden Building 1937-1939*) were the first buildings on the site and were accessed from the former Vaughn Street road reserve.

Conclusions

Four Heritage Impact reports have been compiled in relation to this application; none have noted the site as either 'contributory' or 'non-contributory' as outlined in the Local Planning Policies 1.6 and 3.6. Although they all agree there is a minor impact on the Historic and Social Values. However, they have demonstrated that they are significant in demonstrating a way of life and associations with the industrial nature of the site area.

From the Statement of Significance for North Fremantle Heritage Area, the buildings on the site relate to the social value concerning the modest worker's accommodation dating from the Federation and Inter-War periods located within North Fremantle.

Additional documents - Ordinary Meeting of Council

25 May 2022

There have been two points of the Statement of Significance for North Fremantle Heritage Area noted as minor impact:

- its focus on the industries relating to the Port of Fremantle, the railways and associated industries established in the area;
- its former industrial character resulting from the former Leighton Marshalling Yards and industries such as the Dingo Flour Mill located in the area;

The City of Fremantle – Local Planning Policy 1.6 Heritage Assessment and Protection emphasis is that special planning controls apply to places within Heritage Areas to conserve and enhance the significance of the area. These places within Heritage Areas can be defined as either 'contributory' or 'non-contributory'. Contributory places may include places which are not individually listed. Where mapping of contributory places has not been undertaken for a heritage area will be assessed upon application.

The City of Fremantle – Local Planning Policy 3.6 Heritage Areas whole of section 3.4 Demolition (applicable to contributory places only) should be considered relevant to the application as there is no proposal for redevelopment. Therefore section 3.4.1 Intent states:

"Demolition is a permanent change that cannot be reversed: even removal of places with lower levels of individual heritage significance can cumulatively undermine the significance of a heritage area."

Demolition of any building or structure on any site located in a Heritage Area requires development approval under the Local Planning Scheme.

In considering a proposal for demolition on any site in a Heritage Area where the mapping of Contributory Places has not been completed and/or is incomplete, the Council shall determine whether any fabric located thereon qualifies as a Contributory Place and applications will be assessed against Clause 4.14 of Local Planning Scheme No. 4 with the following providing additional guidance."

There is a loss of opportunity in demolishing *Massey Harris & Co Ltd pre-1936* and *J Gadsden Building 1937-1939* on the subject land for future development that may benefit from the conservation of the buildings recommended for retention.

An example as precedence is the CBH Grain Silos (fmr) in Bunbury that was slated in 1995 for demolition after the newer 1960's silos were imploded in 1992. Recognised in the place documentation as "a significant local landmark, initially as part of an imposing bulk terminal structure at the edge of the Bunbury Port, and later as part of an innovative adaptive reuse of the silos as part of a residential complex." It has been recognised as "an innovative response to the prospect of demolition, with the design commended at the RAI National Awards and Heritage Council Awards."

Recommendation

The *Massey Harris & Co Ltd pre-1936* and *J Gadsden Building 1937-1939* buildings have some significance as contributory places within the North Fremantle Heritage Area, based on their aesthetic, historic and social values as representative as early examples of the type and style of buildings with identifiable former industrial streetscape and in demonstrating a way of life and associations with the industrial uses established in the area.

From prior experiences, any elements removed for storage should be protected within the site until they can be utilised for future development. This would also include removing asbestos-containing materials currently covering the original building fabric.

Yours sincerely,

Kent Lyon Architect Pty Ltd

A handwritten signature in black ink, appearing to read "Kent Lyon".

Kent Lyon

Director | Registered Architect

RAIA M.ICOMOS GSAP LEA

B Arch (UWA) B Arts in Arch (UW, Seattle)

Kent Lyon Architect

24 May 2020



C2205-1 SECTION 31 RECONSIDERATION - BRACKS STREET, NO. 90 (LOTS 241-260), NORTH FREMANTLE – DEMOLITION OF EXISTING BUILDINGS AND STRUCTURES - (CS/CJ DA0440/21)

Proposed alternative recommendation submitted by Cr Andrew Sullivan

Council:

- 1. Reconsider the development application for a demolition of buildings and structures at No. 90 (Lots 241-260) Bracks Street, North Fremantle and reaffirm its decision to approve the application subject to Conditions 1-9 as listed in the determination dated 2 March 2022 as the existing buildings are considered to have some cultural heritage significance.**
- 2. That the administration request an extension from the State Administrative Tribunal for the submission of Statement of Evidence to allow a heritage consultant to provide an additional comprehensive assessment and suitably qualified advice regarding the level of asbestos contamination on the heritage fabric and feasible methods of remediation.**

Reason for alternative:

Based on additional heritage advice provided by the City's consultant, I would like Council to reaffirm its decision made requiring retention of fabric and require additional time for technical advice to be prepared for lodgement to SAT to support its position ahead of a hearing.



C2205-1 SECTION 31 RECONSIDERATION - BRACKS STREET, NO. 90 (LOTS 241-260), NORTH FREMANTLE – DEMOLITION OF EXISTING BUILDINGS AND STRUCTURES - (CS/CJ DA0440/21)

Proposed amendment submitted by Cr Ben Lawver

Add an additional condition, to read as follows:

Prior to the issue of a Demolition Permit for the development hereby approved the existing building shall be fully documented in the form of a professionally prepared study of the physical, documentary and other evidence associated with the site before any physical or material disturbance. This documentation shall consist of the following:

- a. A professionally prepared architectural report including the address, names, use and description of the building and accurate measured drawings at a scale not less than 1:100. All documents shall be of A4 size or folded into A4 size.**
- b. A photographic report which includes the following:**
 - i. A site plan showing the position, direction and number of each photograph.**
 - ii. The history of the original building and subsequent stages of development.**
 - iii. Old photographs relating to this site and building.**
 - iv. Any other relevant historical information.**

One set of such records including photographs shall be submitted to the City of Fremantle in electronic format prior to the commencement of development.