11. ASSESSMENT OF CULTURAL HERITAGE SIGNIFICANCE

The criteria adopted by the Heritage Council in November 1996 have been used to determine the cultural heritage significance of the place.

PRINCIPAL AUSTRALIAN HISTORIC THEME(S)

- 3.18.2 Banking and lending
- 5.4 Working in offices
- 8.14 Living in the country and rural settlements

HERITAGE COUNCIL OF WESTERN AUSTRALIA THEME(S)

- 306 Domestic activities
- 308 Commercial & service industries

11.1 AESTHETIC VALUE*

Commonwealth Bank, Narrogin is a fine example of the design detail of Inter War Stripped Classical style with a strongly modelled facade of monumental vertical scale emphasising verticality, countered by horizontal elements. (Criteria 1.1 & 1.2)

The strongly modelled facade and monumental vertical scale of Commonwealth Bank, Narrogin creates a building of significant interest with a strong presence in the streetscape of the Narrogin business district. (Criterion 1.3)

11.2 HISTORIC VALUE

Commonwealth Bank, Narrogin was the fourth Commonwealth Bank branch to be opened in Western Australia and illustrates the successful endeavour of the Bank to project a successful image following the financial constraints of the Depression. (Criterion 2.1)

Commonwealth Bank, Narrogin is indicative of the economic prosperity of the Western Australian wheatbelt and the district and town of Narrogin in particular in the late 1930s, and marks Narrogin as a major rural centre. (Criterion 2.1)

* For consistency, all references to architectural style are taken from Apperly, R., Irving, R., Reynolds, P. A Pictorial Guide to Identifying Australian Architecture. Styles and Terms from 1788 to the Present, Angus and Robertson, North Ryde, 1989.

Commonwealth Bank, Narrogin has been a major provider of financial services for the agricultural industry, housing and municipal development in Narrogin, and agent for Commonwealth policies for over 60 years. (Criterion 2.2)

Commonwealth Bank, Narrogin is associated with prominent architect and lecturer William Haydn Robertson in his capacity as architect in the Perth office of the Commonwealth Department of Works, 1933-c.1946. Robertson supervised the construction of the General Post Office and the Commonwealth Bank Building in Forrest Place. (Criterion 2.3)
11.3 SCIENTIFIC VALUE

11.4 SOCIAL VALUE
The building is valued by the local community for its architectural features and financial associations as evidenced by its listing in the Town of Narrogin Municipal Inventory. (Criterion 4.1)

Commonwealth Bank, Narrogin contributes significantly to the community’s sense of time and place as a dominant 1930s building in the main commercial street. (Criterion 4.2)

12. DEGREE OF SIGNIFICANCE

12.1 RARITY
Commonwealth Bank, Narrogin is a comparatively rare example of a transitional style of architecture applied to a rural branch of the Commonwealth Bank and demonstrates the development of this distinctive style of architecture. Other rural examples of Commonwealth Bank buildings exhibiting this transitional style are those at Northam, Geraldton and Katanning. (Criterion 5.1)

The inclusion of residential accommodation in Commonwealth Bank, Narrogin, whilst not common practice today, was usual in the period in which the place was constructed. (Criterion 5.2)

12.2 REPRESENTATIVENESS
Commonwealth Bank, Narrogin is representative of a substantial architectural style adopted by the Commonwealth Bank to symbolise the stability of the institution. The formal monumentality and imposing grandeur of the facade, in a rural branch, emphasises the importance of the town of Narrogin at the time.

12.3 CONDITION
Commonwealth Bank, Narrogin is in good condition having been in constant use since construction. Regular maintenance has been applied to areas in constant use.

12.4 INTEGRITY
The original intention of the banking function is intact although the upper floor residential area no longer fulfils that function. This could be reinstated as there has been little structural alteration but it is unlikely to suit current accommodation requirements. Commonwealth Bank, Narrogin retains a high degree of integrity.

12.5 AUTHENTICITY
The upper floor of Commonwealth Bank, Narrogin retains much of the original form and fabric and, overall, the building has a moderate to high degree of authenticity. The alterations to the proportions of the ground floor, particularly the banking chamber, and the current surface finishes are markedly different from the original design.
13. **SUPPORTING EVIDENCE**

The documentation for this place is based on the heritage assessment completed by Irene Sauman, Historian and Laura Gray, Heritage and Conservation Consultant, in October 2005, with amendments and/or additions by HCWA staff and the Register Committee.

13.1 **DOCUMENTARY EVIDENCE**

Commonwealth Bank, Narrogin is a double-storey rendered brick and corrugated iron building, constructed in 1940 to a design by Commonwealth Architect W. H. Robertson.

The township of Narrogin developed as the maintenance and administration centre of the Great Southern Railway and a service centre for the surrounding farming region. The population of the district increased rapidly in the early 1900s with prospectors moving into the area due to the downturn in gold production in the eastern goldfields. Narrogin was declared a Municipality in 1906.¹

The first banks in Narrogin were the National Bank of Australasia, which opened an agency in 1902 and constructed a bank building in 1906; the Union Bank, whose 1905 bank building was the first two-storey building in the town; and the Agricultural Bank, which occupied rented premises.² The Commonwealth Bank of Australia was created under the Commonwealth Bank Act of 1911. The Act empowered the Bank to conduct both savings and general (trading) bank business with the security of a Federal Government guarantee, in comparison to existing banks which were privately owned. Establishment of the Commonwealth Bank was a result of the bank crashes which occurred during the recession in the Eastern States in 1893, and the need for a central bank to regulate monetary policy. On 13 January 1913, the Commonwealth Bank commenced business in Western Australia with 164 Post Offices throughout the state offering savings facilities on its behalf.³

At Narrogin, Commonwealth Bank operations achieved branch status on 16 February 1928, at which time full trading and savings facilities were offered. Some 40 post office agencies were administered from the branch, which was the fourth to open in rural Western Australia.⁴ The Narrogin branch operated from rented space in the newly completed Lesser Town Hall, on the corner of Federal and Fortune Streets.⁵ The first manager was D. C. Morrell, previously from Adelaide, assisted by Eric Bray and D. C. Cummins from the Perth office. The branch traded Monday to Saturday, and from 7.00 p.m. to 9.00 p.m. on Friday evenings to receive savings bank deposits.⁶

On 6 April 1928, Sir Robert Gibson, the Chairman of Directors of the Commonwealth Bank, and E. Riddle, the Bank Governor, visited Narrogin during

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¹ A more detailed history of the development of Narrogin can be found in HCWA assessment documentation for Narrogin Post Office, P1818 and Narrogin Railway Station, P3521.
² Town of Narrogin Municipal Heritage Inventory; HCWA database, P1813; Ball, J., Kelsall, D., & Pidgeon, J., *Statewide Survey of Banks 1829-1939: Southern Region, Western Australia*, National Trust of Australia (WA), November 1997.
an inspection tour of Western Australia. They held a meeting in the Narrogin Town Hall, which was attended by members of surrounding Road Boards, local businessmen, councillors and the local Member of Parliament, E. B. Johnston, MLA. The attendees at the meeting were informed that the Commonwealth Bank directed funds to make loans to municipalities for developing the country and that the Bank was looking at expanding their Western Australian operations. Narrogin, ‘by its geographical position and commercial importance, could not be overlooked in an extension of bank facilities’. This information was well received by those present.7

In the early 1930s, as the Great Depression continued, in an effort to assist in alleviating unemployment, the Commonwealth Government instigated numerous projects and expanded its programme of public works, including construction of Government buildings. Throughout Australia, numerous substantial bank premises would be erected for the Commonwealth Bank under this programme.8

Plans to expand the Bank’s facilities in Narrogin were thwarted by the onset of the Depression and it was not until 1937 that the western portion of lot 48 on Fortune Street, beside the National Bank, was acquired as a site for Commonwealth Bank, Narrogin.9 Already on the site was a brick shop building occupied by the newspaper office and printing works of the Great Southern Leader, a small weatherboard shop, two residences, outbuildings including an iron shed and stables off the rear right-of-way, and an underground tank. All the buildings were to be demolished and the underground tank filled in for the construction of Commonwealth Bank, Narrogin.10

Plans for the two-storey Commonwealth Bank, Narrogin were drawn up under the direction of architect William Haydn Robertson in his capacity as head of the Perth drawing office of the Commonwealth Department of Works. Robertson had studied at Melbourne University, graduating in 1927, and then spent six years working in Britain and Canada. In 1933 he joined the Commonwealth Department of the Interior and was later transferred to the Commonwealth Works Department Perth branch, where he was engaged in the design of the Commonwealth Bank and the GPO in Forrest Place. Robertson lectured part-time at Perth Technical College from 1937, was Lecturer-in-Charge from 1945 to 1953, and was known for his high professional standards. He died in 1953, at the age of 48. Robertson Lecture Theatre and Robertson Memorial Travel Grant at the Curtin University School of Architecture and Planning is named after him.11

Tenders for Commonwealth Bank, Narrogin were called on 25 February 1939. Eight tenders were received, ranging in price from £5,432 to £8,199. The lowest price was from J. B. Hawkins & Sons, who immediately had to withdraw their tender when they discovered an error in their figures. The next lowest tender of £6,227 was considered too high by the Bank’s Sydney Property Department, who had estimated the cost at £5,775. None of the tenders were accepted, and changes were made to the detail of the interior finishes in an effort to reduce the cost. The Perth office of the Department of Works was also encouraging local

7 Great Southern Leader, 6 April 1928, p. 5.
8 Carolyn Denham-Shade and Katrina Chisholm, assessment documentation P1871 Commonwealth Bank, Northam, p. 4.
9 Certificate of Title, Vol. 1055 Fol. 69, 30 July 1937.
brick maker R. E. Hearn to improve the quality of his bricks, with regard to strength, as a local supply would cut the cost of construction by £200 over the cost of bricks supplied from Perth.\footnote{12}

New tenders for Commonwealth Bank, Narrogin were called in May 1939 and fourteen were received. The lowest was £4,795 from W. C. Giltrap, which was accepted. Giltrap had previously worked as foreman for F. J. Deacon on Commonwealth Works Department projects. Demolition of existing structures on the site was underway in the first days of February 1940 and construction was scheduled to begin on 7 February. The bricks that were eventually used were machine made wire cut bricks from Katanning, which represented a saving in cartage and handling. Apart from the strength to support a two-storey structure, the bricks did not have any other particular requirements as Commonwealth Bank, Narrogin was to be cement rendered internally and externally, and finished with three coats of waterproof cement bonding paint. Final cost for construction was slightly less than the accepted tender due to minor changes during construction and came in at £4,656 8s 3d.\footnote{13}

Commonwealth Bank, Narrogin was completed on 16 August 1940, and manager R. T. Farris and his wife moved in shortly after, occupying the upper floor accommodation area. A report on the new building appeared on the front page of the Narrogin Observer on 12 October 1940:

> It is an imposing structure of brick and concrete and carries with it a dignified solidity which easily marks it out for the instant attention of visitors... The design of the building is along modern principles of architecture which run to straight lines without those embellishments which are a feature of older buildings of similar character. As a matter of fact the façade of the building is severe in simplicity of design... and yet preserves a greater dignity and forcefulness of character which, in all probability, was the underlying intention of the architect to portray...

> The entrance to the main banking chamber is through magnificent plate glass doors, each of which is covered by wrought hand-made ironwork of a most artistic nature.\footnote{14}

The fittings, including the polished jarrah counter and bronze screening, were described as substantial and modern, and the lighting, which had been supplied by Chubbs, as exceptional. Chubbs also provided the strongroom. Electrical work was by H. R. Grant, plumbing by S. W. Hart & Co, both of Perth, and ceilings by H. B. Brady, of Perth and Katanning. It was noted that the upper floor west-facing verandah, which was intended as a ‘sleeping out resort’, had been enclosed and put in use as a living area.\footnote{15}

During World War Two, Commonwealth Bank, Narrogin was heavily involved with Commonwealth Loans and other forms of Government fundraising, as well as acting as local agents for the Rationing Commission. After the war the Bank was involved in providing finance for housing construction and industrial development. In 1959, the Reserve Bank Act removed the central bank function from the Commonwealth Bank and the organisation was renamed the Commonwealth Banking Corporation, which included the newly constituted Commonwealth Development Bank.\footnote{16}

During the post World War Two agricultural boom, staff numbers increased at Commonwealth Bank, Narrogin, reaching ten in 1961, and working space was

\footnotesize{12 Commonwealth Bank files, 37/38/18 Part 1, National Archives, Perth.
13 Commonwealth Bank files, 37/38/18 Part 1, National Archives, Perth.
14 Narrogin Observer, 12 October 1940, p. 1.
15 Narrogin Observer, 12 October 1940, p. 1.
extended with internal layout changes. A night safe was installed in 1964. In 1969, Gnowangerup Building Supply Company was responsible for an extensive refurbishment and modernisation of the place, at a cost of $19,365. It was at this time that the rear two-storey extension was added.\textsuperscript{17}

A bank report of the late 1960s described Narrogin as a ‘thriving town where about 50 new dwellings were erected annually, generally in the better-class price bracket of between $12/$16,000’. The shopping centre was growing, and although industry was fairly static, agriculture was diversifying and employing technological advances and improved mechanisation to increase yields. Also in the late 1960s, mechanisation of book-keeping systems replaced the traditional pen and ink method, and in 1976 computerisation of services began, which had the effect of reducing staff needs.\textsuperscript{18}

Managers at Commonwealth Bank, Narrogin changed regularly, with residency sometimes extending to around ten years prior to 1970, but generally being around four to five years. R. T. Farris, who was the first to occupy Commonwealth Bank, Narrogin, was the longest serving manager (1938-1948).\textsuperscript{19}

In 1989, a single-storey entrance porch was added on the north-west side of the place and the central street entrance was remodelled to create a window. The entry porch was altered in 1995 for the installation of an Automatic Teller Machine (ATM).\textsuperscript{20} The upper floor of Commonwealth Bank, Narrogin ceased to be used for staff accommodation sometime in the early 1980s, and has been converted for use as staff facilities. The maid’s room has become the male toilet, and two bedrooms have been converted to a female toilet and a locker room.\textsuperscript{21}

In December 1990, the Commonwealth Bank Restructuring Act provided for the establishment of the Bank as a company under Corporations Law, with the Commonwealth Government divesting itself of its shares in the organisation.\textsuperscript{22}

In 1996, Commonwealth Bank, Narrogin was entered on the Town of Narrogin Municipal Heritage Inventory with a recommended high level of protection (level 2).\textsuperscript{23} The place is also entered on the Art Deco Significant Building Survey and the Statewide Bank Survey.\textsuperscript{24}

In 2005, Commonwealth Bank, Narrogin continues to function as a major banking facility for Narrogin and surrounding districts.

### 13.2 PHYSICAL EVIDENCE

Commonwealth Bank, Narrogin is a double-storey rendered brick building with a low pitched hipped corrugated iron roof, constructed in the Inter War Stripped Classical style with Inter War Art Deco features.

\textsuperscript{17} ‘Commonwealth Bank of Australia: Representation in Narrogin WA’, op cit.
\textsuperscript{18} ‘Commonwealth Bank of Australia: Representation in Narrogin WA’, op cit.
\textsuperscript{19} ‘Commonwealth Bank of Australia: Representation in Narrogin WA’, op cit.
\textsuperscript{20} Original plans, courtesy Commonwealth Bank, Narrogin; 1997 plans, courtesy Commonwealth Bank property section, Sydney.
\textsuperscript{21} Original plans, courtesy Commonwealth Bank, Narrogin; 1989 plans, courtesy Commonwealth Bank property section, Sydney.
\textsuperscript{23} Narrogin Municipal Inventory Steering Committee, Municipal Heritage Inventory prepared for the Town of Narrogin, 1995.
\textsuperscript{24} Ball, J., Kelsall, D., & Pidgeon, J., Statewide Survey of Banks, op cit; Geneve, Vyonne, Significant Buildings of the 1930s in Western Australia, National Trust, Perth, 1994.
Commonwealth Bank, Narrogin is located on the south side of Fortune Street, the main commercial street of the town of Narrogin, opposite the post office, and on the west side of the National Bank.

The Town Hall complements the south group of buildings in Fortune Street on the south west corner, and is balanced by Commonwealth Bank, Narrogin on the south west corner of the row of buildings. The Fortune Street streetscape is dominated by a steep slope up from the east to the west, the centre angled parking along the street, and the street plantings along the centre of the road and on the edge of the verge on both sides of the road. The street plantings obscure the streetscape views of Commonwealth Bank, Narrogin.

William Kennedy Way further defines the site along the west boundary and there is a right of way along the rear, adjoining Moss Park on the south. The rear of the site has vehicular access. The rear yard is an informal car park and not developed. A mature palm is dominant within the rear area of the site. There is a face brick fence along the west side street boundary, a section of picket fence across the rear, and a Hardiflex fence along the east boundary.

The dominant frontage of Commonwealth Bank, Narrogin is symmetrical and occupies most of the width of the site, with an intrusive single storey addition on the north-west corner. The front façade is at zero setback on the pedestrian pavement. The front facade of Commonwealth Bank, Narrogin displays characteristics of Inter War Stripped Classical style. The formality and robust monumentality of Commonwealth Bank, Narrogin makes an impressive and contrasting contribution to the streetscape reflecting the stable nature of the institution. The plain surfaces, verticality and monumental scale of classical proportions are typical of the style. This facade also presents stylistic elements of the Inter War Art Deco period including the three dimensional quality of the massing and details as evidenced by the central element with deeply recessed windows between fluted vertical stepped rectangular columns. The dichotomy of styles presents an interesting transitional period in the development of the style of Commonwealth Bank buildings. The remaining elevations of Commonwealth Bank, Narrogin are less imposing.

Commonwealth Bank, Narrogin shows evidence of at least three distinct periods of development; 1940 original double storey bank building; single storey extension on west side, behind verandah section, double storey extension at the rear; and the 1989 entry on the south west corner.

Commonwealth Bank, Narrogin has a symmetrical frontage which is dominant in the streetscape with the centre front element protruding to zero setback and flanked by stepped recessed elements. The central element features three vertical bays that are deeply recessed and divided by stepped rectangular pillars the full double storey height. The windows within the recesses are glazed in horizontal panels the full width of each bay, but form a vertical emphasis with vertical fluting connecting between the windows. The pediment of the building contributes to the imposing scale with a series of stepped bandings to a height beyond 1.0 metre. The facade forms a simple stepped parapet that is continued around the west side for the depth of the bank chamber. Below the west parapet wall is the single storey extension, also rendered, but with a curved parapet porch supported by simple round columns. The rear of the building is similarly rendered throughout. It is simple utilitarian and geometric in form. The first floor verandah on the west side has been enclosed with aluminium-framed windows and a flat ribbed pre-painted corrugated galvanized steel roof, which is the same as the roof on the side extension. At the rear there is a double storey extension that
similarly has a flat roof. There are steel escape stairs on the east side accessed from the kitchen area.

*Commonwealth Bank, Narrogin* forms roughly a rectangular footprint. The ground floor houses banking facilities and on the first floor what was originally the manager’s residence now provides staff kitchen, toilets and storage space. The upper floor rooms remain predominantly empty.

The entry into the banking chamber is from the north-west side front of the building, under the roof of the 1989 extension. It opens directly into the public space of the banking chamber that extends across almost the entire frontage, except for rooms along the east side. Behind the counter is an expansive area that adjoins to the rooms along the east and to the small areas at the rear that predominantly are access areas, and also adjoins the staircase to the first floor.

The offices behind the counter side of the banking chamber are predominantly the original rooms, although there is a new door on the west wall connecting to the extension on the west front corner.

The banking chamber and public accessible spaces at the front have timber floors and hard plaster walls, and the original recessed ceiling and decorative fluted cornices and beam edging remain in situ amongst the air conditioner installations and rectangular fluorescent light panels. Subsequent refurbishments of the banking chamber have seen the loss of some original features and detailing on the ground floor, although most original detailing is still evident and intact on the first floor.

The first floor rooms are substantially intact and of the original proportions, although a bedroom, and the maids room on the east side have been converted to ladies and men’s toilets respectively with the introduction of partitions to provide staff toilet facilities. Hard plaster walls and 0.075 metre (3 inch) jarrah floorboards remain intact. The verandah is lined with flat asbestos sheeting and evidences the original 0.075 metre (3 inch) jarrah floorboards. The original oiled jarrah timber joinery in the architraves, skirtings and picture rails and internal jarrah veneer doors and bevelled glass jarrah framed French doors have been retained. Also significant are the ceilings that are rectangular panels of plaster board with simple geometric designed stepped cornices. Two fireplaces remain intact showing the face brickwork in geometric patterning typical of the style and period. The original venetian blinds remain in place on the jarrah framed double hung sash windows.

The staircase returns on the east wall and is entirely enclosed to the ground floor with a timber handrail fixed to the walls each side, curving around the return. The kitchen has a c.1970s timber fitout, but also evidences the original ‘back door’ with patterned obscure glass panels and fanlight. The bathroom is, similarly, a c.1970s fitout.

The building is in good condition having been in constant use since construction. Changing technology and the public face of the bank has instituted occasional refurbishments. Regular maintenance has been applied to those areas in constant use.

13.3 COMPARATIVE INFORMATION

There are 57 places on the Heritage Council database designed at least in part in the Inter War Stripped Classical style, 15 of which are on the Register of Heritage Places.
Of the 57 places on the database designed at least in part in the in the Inter War Stripped Classical style, eleven are (or were) banks. Of these eleven, six are Commonwealth Banks, including Commonwealth Bank, Narrogin. The other five are:

- P13456 Commonwealth Bank (fmr) Geraldton (1938);
- P01871 Commonwealth Bank, Northam (1923) (registered);
- P01350 Commonwealth Bank, Katanning (1937);
- P06607 Commonwealth Bank, Mount Lawley (1938); and,
- P4575 Commonwealth Bank (fmr) Bunbury (1928) (registered).

As part of a suite of Commonwealth Banks constructed in the State from the late 1920s to the early 1940s, each exhibits the distinctive (yet difficult to define in terms of architectural style) features of what could be known as the Commonwealth Bank "house style".

P13456 Commonwealth Bank (fmr), Geraldton was built at the same time and to the same design as Commonwealth Bank, Narrogin and retains its central entry with a portico roof added. An ATM has been installed in place of a window beside the entrance.

Commonwealth Bank (Northam) is in the Inter War Beaux Arts style, with Inter War Art Deco features. It is a two storey, rendered brick building with a hipped tiled roof. The street elevation is dominated by the verticality and overwhelming scale of the gently curved entrance portico, featuring double height fluted columns.

P1350 Commonwealth Bank Katanning (1937) is in the Inter War Art Deco style with some Inter War Stripped Classical features. It is a two storey rendered brick building with a hipped tiled roof comprising a Banking Chamber and Bank Manager’s Residence. It is still used as a bank, although the residence is now used as office space. It has a moderate to high degree of authenticity, the only major change being to the banking chamber, which has been enlarged and altered. The front façade of the original structure is symmetrical, and is dominated by the vertical proportions of the wide central bay, which projects forward with rounded corners as a two-storey portico with a parapeted lintel.25

Commonwealth Bank, Narrogin therefore is a comparatively rare example of a transitional style of architecture applied to a rural branch of the Commonwealth Bank, with Geraldton, Northam and Katanning being the other known examples.

As with Commonwealth Bank, Narrogin, Commonwealth Bank (Mount Lawley) is in the Inter War Stripped Classical style with Art Deco features. It is a two storey rendered brick building with strong vertical elements.

Commonwealth Bank (fmr) (Bunbury) is in the Inter War Stripped Classical style. The only vertical element in the façade of the two-storey building is the truncated corner façade. This place has more emphasis on the classical, although it has been described as a minor version of the same house style used in P02064 Commonwealth Bank Building (1930), Forrest Place, (registered) which is referred to as Inter War Beaux Arts. Commonwealth Bank, Bunbury is currently

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25 Robin Chinnery and David Heaver, assessment documentation for P01350 Commonwealth Bank, Katanning, July 2006.
occupied as offices, including the electoral offices of local Members of Parliament. 26

Other banks in the Stripped Classical style include the National Banks at Manjimup (1498) and Northbridge (14764), the Banks of New South Wales (fmr), Corrigin (8220) and Bridgetown (243) and Bankwest Building, Carnamah (453), none of which bear a similarity to Commonwealth Bank, Narrogin. None are on the State Register.27 Commonwealth Bank, Narrogin therefore is a fine and comparatively rare example of the Inter War Stripped Classical style applied to a bank building.

13.4 KEY REFERENCES
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13.5 FURTHER RESEARCH
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26 HCWA database; Heritage Council documentation Commonwealth Bank (fmr), Bunbury (4575) and Commonwealth Bank Building, Forrest Place (2064); Ball, J., Kelsall, D., & Pidgeon, J., Statewide Survey of Banks, op cit, entries 042 B1, 025 B1 & 079 B2.

27 HCWA database; Ball, J., Kelsall, D., & Pidgeon, J., Statewide Survey of Banks, op cit.